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| **Date:** | June 11, 2024 |
| **To:** | Board of Directors |
| **From:** | Caitlin Smith, Technical Advisory Committee (TAC) Chair |
| **Subject:** | Unopposed Revision Requests Recommended by TAC for Approval |

## Issue for the ERCOT Board of Directors

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| **ERCOT Board of Directors Meeting Date:** June 18, 2024  **Item No.:** 3.1 |

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| **Issue:**Consideration of the following Revision Requests: Nodal Protocol Revision Request (NPRRs), Nodal Operating Guide Revision Requests (NOGRRs) and Planning Guide Revision Requests (PGRRs) recommended for approval by TAC (with no opposing votes recorded):  * NPRR1198, Congestion Mitigation Using Topology Reconfigurations; * NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID; * NPRR1218, REC Program Changes Per P.U.C. SUBST. R. 25.173, Renewable Energy Credit Program; * NPRR1220, Market Restart Approval Process Modifications; * NPRR1222, Public Utility Commission of Texas Approval of the Methodology for Determining Ancillary Service Requirements; * NPRR1223, Addition of TA Contact Information Into TDSP Application Form; * NPRR1228, Continued One-Winter Procurements for Firm Fuel Supply Service (FFSS) – URGENT; * NOGRR255, High Resolution Data Requirements; * NOGRR258, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations; * PGRR112, Dynamic Data Model and Full Interconnection Study (FIS) Deadline for Quarterly Stability Assessment; * PGRR113, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations; and * PGRR114, Related to NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID. |
| **Background/History:** **Unless otherwise noted: (i) all Market Segments participated in each vote; (ii) For NPRRs, ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed the NPRR and do not believe it requires changes to credit monitoring activity or the calculation of liability; (iii) ERCOT supports the Revision Request; and (iv) the Independent Market Monitor (IMM) has no opinion on the Revision Request.**   * ***NPRR1198, Congestion Mitigation Using Topology Reconfigurations***   **Sponsor:** EDF Renewables  **Proposed Effective Date:** Upon system implementation – Priority 2025; Rank 4520  **Estimated Impacts:** Between $50K and $80K, Annual Recurring Operations and Maintenance (O&M) Between $180K and $220K; 1.0 Full-Time Employee (FTE)  **Revision Description:** This NPRR defines Extended Action Plan (EAP), adds EAP as a type of Constraint Management Plan (CMP) suitable for managing congestion that is resolvable by Security-Constrained Economic Dispatch (SCED), and removes language limiting the application of EAPs to congestion issues for which there exists no feasible SCED.  **TAC Decision:** On 5/22/24, TAC voted to recommend approval of NPRR1198 as recommended by PRS in the 5/9/24 PRS Report. There were four abstentions from the Cooperative (STEC), Independent Generator (2) (Jupiter Power, Calpine) and Investor Owned Utility (IOU) (CNP) Market Segments.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1198 and believes that it provides a positive market impact by leveraging ERCOT’s existing CMP process to mitigate critical transmission congestion impacts.  **IMM Opinion:** IMM supports approval of NPRR1198.   * ***NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following Public Utility Commission of Texas (PUCT) approval  **Estimated Impacts:** No impact  **Revision Description:** This NPRR revises Section 10.3.2, ERCOT-Polled Settlement Meters, to clarify the obligation of a Distribution Service Provider (DSP) to provide ERCOT with an Electric Service Identifier (ESI ID) for a Resource site that consumes Load other than Wholesale Storage Load (WSL) and that is not behind a Non-Opt-In Entity (NOIE) tie meter.  **TAC Decision:** On 4/15/24, TAC voted to recommend approval of NPRR1212 as recommended by PRS in the 4/5/24 PRS Report. There were four abstentions from the Cooperative (GSEC, LCRA, PEC, STEC) Market Segment.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1212 and believes that it provides a positive market impact by offering regulatory requirements that clarify the obligation of a DSP to provide ERCOT with an ESI ID for a Resource site that consumes Load other than WSL and that is not behind a NOIE tie meter.   * ***NPRR1218, REC Program Changes Per P.U.C. SUBST. R. 25.173, Renewable Energy Credit Program***   **Sponsor:** ERCOT  **Proposed Effective Date:** Upon system implementation  **Estimated Impacts:** Less than $20K (O&M)  **Revision Description:** This NPRR updates Section 14, State of Texas Renewable Energy Credit Trading Program, to comply with P.U.C. Subst. R. 25.173, Renewable Energy Credit Program. This includes an update of the Renewable Portfolio Standard (RPS) requirement to pertain to only solar renewable energy.  **TAC Decision:** On 5/22/24, TAC voted unanimously to recommend approval of NPRR1218 as recommended by PRS in the 5/9/24 PRS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1218 and believes that it provides a positive market impact by updating Section 14 to comply with P.U.C. Subst. R. 25.173.   * ***NPRR1220, Market Restart Approval Process Modifications***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following PUCT approval  **Estimated Impacts:** No impact  **Revision Description:** This NPRR modifies the Market Restart process. The proposed process requires Technical Advisory Committee (TAC) and ERCOT Board approval, with an alternative mechanism to ERCOT Board approval where circumstances require it.  **TAC Decision:** On 5/22/24, TAC voted unanimously to recommend approval of NPRR1220 as recommended by PRS in the 5/9/24 PRS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1220 and believes that it provides a positive market impact by modifying the Market Restart process to require TAC and ERCOT Board approval where circumstances require it.   * ***NPRR1222, Public Utility Commission of Texas Approval of the Methodology for Determining Ancillary Service Requirements***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following PUCT approval  **Estimated Impacts:** No impact  **Revision Description:** This NPRR, consistent with ERCOT discussions with the PUCT, elevates final approval of the Other Binding Document titled, “ERCOT Methodologies for Determining Minimum Ancillary Service Requirements”, from the ERCOT Board of Directors to the PUCT.  **TAC Decision:** On 5/22/24, TAC voted unanimously to recommend approval of NPRR1222 as recommended by PRS in the 5/9/24 PRS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1222 and believes the market impact for NPRR1222 appropriately incorporates the PUCT into the approval structure of the Ancillary Service methodology Other Binding Document.   * ***NPRR1223, Addition of TA Contact Information Into TDSP Application Form***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following PUCT approval  **Estimated Impacts:** No impact  **Revision Description:** This NPRR updates Section 23, Form J, Transmission and/or Distribution Service Provider Application for Registration, to require Transmission and/or Distribution Service Providers (TDSPs) to provide contact information to ERCOT.  **TAC Decision:** On 5/22/24, TAC voted unanimously to recommend approval of NPRR1223 as recommended by PRS in the 5/9/24 PRS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1223 and believes that it provides a positive market impact by embodying Strategic Plan Objective 1 by updating Section 23, Form J to require TDSPs to provide contact information to ERCOT for use during a Mass Transition or acquisition transfer.   * ***NPRR1228,*** ***Continued One-Winter Procurements for Firm Fuel Supply Service (FFSS) – URGENT***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following PUCT approval  **Estimated Impacts:** No impact  **Revision Description:** This NPRR decreases – from two to one – the number of Firm Fuel Supply Service (FFSS) obligation periods awarded in an FFSS procurement.  **TAC Decision:** On 5/22/24, TAC voted unanimously to recommend approval of NPRR1228 as recommended by PRS in the 5/9/24 PRS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1228 and believes the market impact for NPRR1228 codifies within Protocols the current practice in which the PUCT has been setting FFSS procurement budgets for one obligation period at a time. PUCT Staff recommended continuing this practice based on a lack of fuel index pricing covering two FFSS obligation periods.  **IMM Opinion:** IMM supports approval of NPRR1228.   * ***NOGRR255, High Resolution Data Requirements***   **Sponsor:** ERCOT  **Proposed Effective Date:** The first of the month following PUCT approval  **Estimated Impacts:** No impact  **Revision Description:** This NOGRR establishes high resolution data requirements.  **TAC Decision:** On 4/15/24, TAC voted unanimously to recommend approval of NOGRR255 as recommended by ROS in the 3/7/24 ROS Report as amended by the 4/11/24 Luminant comments**.**  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NOGRR255 and believes it has a positive market impact as it provides ERCOT with high resolution data for model validation and event analysis to ensure ERCOT System reliability, and assists compliance with North American Electric Reliability Corporation (NERC) Reliability Standard PRC-002-4, Disturbance Monitoring and Reporting Requirements, which went into effect April 1, 2024.   * ***NOGRR258, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations***   **Sponsor:** EDF Renewables, Inc.  **Proposed Effective Date:** Upon implementation of NPRR1198  **Estimated Impacts:** There are no additional impacts to this NOGRR beyond what was captured in the Impact Analysis for NPRR1198.  **Revision Description:** This NOGRR proposes changes to align the Nodal Operation Guide with NPRR1198 that adds language to allow the use of Remedial Action Plans (RAPs) and EAPs to facilitate the market use of the ERCOT Transmission Grid. NOGRR258 also adds guardrails to ensure that topology reconfiguration requests meet basic reliability and economic criteria, and defines the process for submission, review, and approval of EAPs.  **TAC Decision:** On 5/22/24, TAC voted to recommend approval of NOGRR258 as recommended by ROS in the 5/2/24 ROS Report. There were four abstentions from the Cooperative (STEC), Independent Generator (2) (Jupiter Power, Calpine) and IOU (CNP) Market Segments.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NOGRR258 and believes that it provides a positive market impact by leveraging ERCOT’s existing CMP process to mitigate critical transmission congestion impacts.   * ***PGRR112, Dynamic Data Model and Full Interconnection Study (FIS) Deadline for Quarterly Stability Assessment***   **Sponsor:** ERCOT  **Proposed Effective Date:** December 1, 2024  **Estimated Impacts:** Less than $10K (O&M)  **Revision Description:** This PGRR establishes requirements for Interconnecting Entities (IEs) to submit dynamic data models and for Transmission Service Providers (TSPs) to submit final Full Interconnection Studies (FISs) for approval at least 45 days prior to the quarterly stability assessment deadline. Projects will not be qualified for the quarterly stability assessment if dynamic data models and final FISs are submitted less than 45 days prior to the deadline. This PGRR also establishes that an IE must notify ERCOT and lead TSP(s) of changes to FIS assumptions that occur after FIS completion and before Initial Synchronization.  **TAC Decision:** On 4/15/24, TAC voted unanimously to recommend approval of PGRR112 as recommended by ROS in the 4/4/24 ROS Report.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed PGRR112 and believes that requiring the dynamic data model and final FISs to be submitted at least 45 days prior to the quarterly stability assessment deadline will have a market positive impact by providing Market Participants time to address ERCOT’s comments from the evaluation of dynamic data models prior to the quarterly stability assessment deadline.   * ***PGRR113, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations***   **Sponsor:**  ERCOT  **Proposed Effective Date:** Upon implementation of NPRR1198  **Estimated Impacts:** There are no additional impacts to this PGRR beyond what was captured in the Impact Analysis for NPRR1198.  **Revision Description:** This Planning Guide Revision Request (PGRR) revises the Planning Guide to provide that ERCOT will first consider transmission needs without Constraint Management Plan (CMP) actions in its Regional Transmission Plan studies, and will then only model a CMP in the Regional Transmission Plan in certain limited circumstances. A CMP will not be planned to resolve a planning criteria performance deficiency unless it is expected that system conditions will change such that the CMP will no longer be needed within the next five years.  **TAC Decision:** On 5/22/24, TAC voted to recommend approval of PGRR113 as recommended by ROS in the 5/2/24 ROS Report. There were four abstentions from the Cooperative (STEC), Independent Generator (2) (Jupiter Power, Calpine) and IOU (CNP) Market Segments.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed PGRR113 and believes that it provides a positive market impact by clarifying and codifying the transmission planning assumptions related to CMPs.  **IMM Opinion:** IMM supports approval of PGRR113.   * ***PGRR114, Related to NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID***   **Sponsor:**  ERCOT  **Proposed Effective Date:** Upon implementation of NPRR1212  **Estimated Impacts:** No impact  **Revision Description:** This PGRR modifies Section 5.5 to clarify that, before ERCOT approves Initial Energization for a project that will consume Load other than WSL and that is not behind a NOIE tie meter, the DSP must provide ERCOT with ESI ID(s) for the project and these ESI ID(s) must be established in the ERCOT Settlement system in a state that allows for the Load to be properly settled to the appropriate Qualified Scheduling Entity (QSE).  **TAC Decision:** On 4/15/24, TAC voted to recommend approval of PGRR114 as recommended by ROS in the 4/4/24 ROS Report. There were four abstentions from the Cooperative (GSEC, LCRA, PEC, STEC) Market Segment.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed PGRR114 and believes that it provides a positive market impact by offering regulatory requirements which clarify that, before ERCOT approves Initial Energization for a project that will consume Load other than WSL and that is not behind a NOIE tie meter, the DSP must provide ERCOT with ESI ID(s) for the project, and that these ESI ID(s) must be established in the ERCOT Settlement system in a state that allows for the Load to be properly settled to the appropriate QSE.  The TAC Reports and Impact Analyses for these Revision Requests are included in the [ERCOT Board meeting materials](https://www.ercot.com/calendar/06182024-Board-of-Directors-Meeting).  In addition, these Revision Requests and supporting materials are posted on the ERCOT website. |
| **Key Factors Influencing Issue:** The PRS met, discussed the issues, and submitted reports to TAC regarding NPRRs 1198, 1212, 1218, 1220, 1222, 1223, and 1228.  The ROS met, discussed the issues, and submitted reports to TAC regarding NOGRRs 255 and 258; and PGRRs 112, 113, and 114. |
| **Conclusion/Recommendation:** As more specifically described above, TAC recommends that the Board recommend approval of NPRRs 1198, 1212, 1218, 1220, 1222, 1223, and 1228; NOGRRs 255 and 258; and PGRRs 112, 113, and 114. |

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.**

**BOARD OF DIRECTORS RESOLUTION**

WHEREAS, after due consideration of the alternatives, the Board of Directors (Board) of Electric Reliability Council of Texas, Inc. (ERCOT) deems it desirable and in the best interest of ERCOT to recommend approval of the following Nodal Protocol Revision Request (NPRRs), Nodal Operating Guide Revision requests (NOGRRs) and Planning Guide Revision Requests (PGRRs) recommended for approval by TAC:

* NPRR1198, Congestion Mitigation Using Topology Reconfigurations;
* NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID;
* NPRR1218, REC Program Changes Per P.U.C. SUBST. R. 25.173, Renewable Energy Credit Program;
* NPRR1220, Market Restart Approval Process Modifications;
* NPRR1222, Public Utility Commission of Texas Approval of the Methodology for Determining Ancillary Service Requirements;
* NPRR1223, Addition of TA Contact Information Into TDSP Application Form;
* NPRR1228, Continued One-Winter Procurements for Firm Fuel Supply Service (FFSS) – URGENT;
* NOGRR255, High Resolution Data Requirements;
* NOGRR258, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations;
* PGRR112, Dynamic Data Model and Full Interconnection Study (FIS) Deadline for Quarterly Stability Assessment;
* PGRR113, Related to NPRR1198, Congestion Mitigation Using Topology Reconfigurations; and
* PGRR114, Related to NPRR1212, Clarification of Distribution Service Provider’s Obligation to Provide an ESI ID.

THEREFORE, BE IT RESOLVED, that the Board hereby recommends approval of NPRRs 1198, 1212, 1218, 1220, 1222, 1223, and 1228; NOGRRs 255 and 258; and PGRRs 112, 113, and 114.

**CORPORATE SECRETARY’S CERTIFICATE**

I, Jonathan M. Levine, Assistant Corporate Secretary of ERCOT, do hereby certify that, at its June 18, 2024 meeting, the Board passed a motion approving the above Resolution by \_\_\_\_\_\_.

IN WITNESS WHEREOF, I have hereunto set my hand this \_\_\_ day of June, 2024.

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Jonathan M. Levine

Assistant Corporate Secretary