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| NPRR Number | [1217](https://www.ercot.com/mktrules/issues/NPRR1217) | NPRR Title | Remove Verbal Dispatch Instruction (VDI) Requirement for Deployment and Recall of Load Resources and Emergency Response Service (ERS) Resources |
| Date of Decision | June 13, 2024 |
| Action  | Recommended Approval  |
| Timeline | Normal |
| Proposed Effective Date | To be determined |
| Priority and Rank Assigned | To be determined |
| Nodal Protocol Sections Requiring Revision  | 2.1, DEFINITIONS3.14.3.1, Emergency Response Service Procurement6.5.9.4.1, General Procedures Prior to EEA Operations 6.5.9.4.2, EEA Levels8.1.3.3.3, Performance Criteria for Qualified Scheduling Entities Representing Non-Weather-Sensitive Emergency Response Service Resources |
| Related Documents Requiring Revision/Related Revision Requests | None |
| Revision Description | This Nodal Protocol Revision Request (NPRR) removes the requirement for Load Resources and Emergency Response Service (ERS) Resources to be deployed using a Verbal Dispatch Instruction (VDI) from ERCOT and updates a reference in paragraph (3)(a) of Section 6.5.9.4.1 to be consistent with changes made in NPRR1176, Update to EEA Trigger Levels. |
| Reason for Revision |  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission General system and/or process improvement(s) Regulatory requirements ERCOT Board/PUCT Directive*(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* |
| Justification of Reason for Revision and Market Impacts | The current use of multiple communication systems for the deployment of Load Resources and ERS Resources creates an unnecessary burden on the control room during Emergency Conditions. In addition to furthering efficiency, removing the VDI requirement will prevent the possibility of conflicting instructions. |
| PRS Decision | On 3/20/24, PRS voted unanimously to table NPRR1217 and refer the issue to ROS. All Market Segments participated in the vote.On 6/13/24, PRS voted unanimously to recommend approval of NPRR1217 as submitted. All Market Segments participated in the vote.  |
| Summary of PRS Discussion | On 3/20/24, ERCOT Staff reviewed NPRR1217. Participants expressed concern that eliminating the VDI requirement removes a safety net confirmation and requested the issue be referred to ROS for further discussion. On 6/13/24, ERCOT Staff informed participants they are coordinating internally to develop a process that would allow interested Qualified Scheduling Entities (QSEs) to check Extensible Markup Language (XML) messaging. |
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| **Opinions** |
| Credit Review | To be determined |
| Independent Market Monitor Opinion | To be determined |
| ERCOT Opinion | To be determined |
| ERCOT Market Impact Statement | To be determined |

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| Cell Number | None |
| Market Segment | Not applicable |

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| **Market Rules Staff Contact** |
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|  |  |
| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| ROS 040424 | Requested PRS continue to table NPRR1217 |
| ERCOT Steel Mills 050124 | Stated it is unknown if all QSEs can inform their service providers promptly to continue to meet the performance requirements of the services and suggested ERCOT withdraw NPRR1217 and continue the use of dual communication processes  |
| CPower 050724 | Noted concern of potential risk associated with relying on a single mode of communication for critical and time-sensitive information and recommended ERCOT adopt some alternative redundant method for communicating deployment and recall of Load Resources and ERS Resources  |
| ROS 061224 | Endorsed NPRR1217 as submitted |
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| **Market Rules Notes** |

Please note the following NPRRs also propose revisions to the following sections:

* NPRR1221, Related to NOGRR262, Provisions for Operator-Controlled Manual Load Shed
	+ Section 6.5.9.4.2

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| Proposed Protocol Language Revision |

## 2.1 DEFINITIONS

Fast Frequency Response (FFR)

The automatic self-deployment and provision by a Resource of their obligated response within 15 cycles after frequency meets or drops below a preset threshold, or a deployment in response to an ERCOT Extensible Markup Language (XML) messaging instruction within 10 minutes. Resources capable of automatically self-deploying and providing their full Ancillary Service Resource Responsibility within 15 cycles after frequency meets or drops below a preset threshold and sustaining that full response for at least 15 minutes may provide Responsive Reserve (RRS).

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| [NPRR1013: Replace the definition “Fast Frequency Response (FFR)” above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:]**Fast Frequency Response (FFR)** The automatic self-deployment and provision by a Resource of their obligated response within 15 cycles after frequency meets or drops below a preset threshold, or a deployment in response to an ERCOT Extensible Markup Language (XML) messaging instruction within 10 minutes. Resources capable of automatically self-deploying and providing their full Ancillary Service Resource award within 15 cycles after frequency meets or drops below a preset threshold and sustaining that full response for at least 15 minutes may provide Responsive Reserve (RRS). |

Sustained Response Period

The period of time beginning ten minutes after the deployment time instructed within the ERCOT Extensible Markup Language (XML) message deploying ERS-10 or 30 minutes after the deployment time instructed within the ERCOT XML message deploying ERS-30, and ending with the recall time instructed within the ERCOT XML message recalling ERS Resources from the deployment.

3.14.3.1 Emergency Response Service Procurement

(1) ERCOT shall issue Requests for Proposals to procure ERS for each Standard Contract Term. The ERS Standard Contract Terms are as follows:

(a) December through March;

(b) April and May;

(c) June through September; and

(d) October and November.

(2) ERCOT shall procure ERS from one or more of the four following ERS service types:

(a) Weather-Sensitive ERS-10

(b) Non-Weather-Sensitive ERS-10

(c) Weather-Sensitive ERS-30

(d) Non-Weather-Sensitive ERS-30

(3) ERS offers shall be submitted only by QSEs capable of receiving Extensible Markup Language (XML) messaging on behalf of represented ERS Resources.

(4) Each site in an ERS Generator must have an interconnection agreement with its Transmission and/or Distribution Service Provider (TDSP) prior to submitting an ERS offer and must have exported energy to the ERCOT System prior to the offer due date. An ERS Resource that cannot inject energy to the ERCOT System can only be offered as an ERS Load.

(5) In order to qualify as weather-sensitive, an ERS Load must meet one of the following criteria:

(a) The ERS Load must consist exclusively of residential sites; or

(b) The ERS Load must consist exclusively of non-residential sites and must qualify as weather-sensitive based on the accuracy of the regression baseline evaluation methodology as described in Section 8.1.3.1.1, Baselines for Emergency Response Service Loads, as an indicator of actual interval Load.

(i) ERCOT shall establish minimum accuracy standards for qualification as an ERS Load under the regression baseline evaluation methodology.

(ii) An ERS Load must have at least nine months of interval meter data to qualify as weather-sensitive under the regression baseline evaluation methodology.

(iii) ERCOT’s determination that an ERS Load qualifies as a weather-sensitive ERS Load is independent of ERCOT’s determination of which baseline methodologies may be appropriate for purposes of evaluating the ERS Load’s performance.

(c) If a site with Distributed Renewable Generation (DRG) has been designated by the QSE to be evaluated by using its native load, the default baseline analysis shall be performed using the calculated native load.

(6) QSEs representing ERS Resources may submit offers for one or more ERS Time Periods within an ERS Standard Contract Term. ERS Time Periods shall be defined by ERCOT in the RFP for that ERS Standard Contract Term. An ERS offer is specific to an ERS Time Period. In submitting an offer, both the QSE and the ERS Resource are committing to provide ERS for that ERS Time Period if selected.

(7) A QSE may submit separate offers for an ERS Resource to provide any or all of the four ERS service types during the same or different ERS Time Periods in the same ERS Standard Contract Term, but ERCOT shall only award offers for one service type for each ERS Resource.

(8) The minimum capacity offer for an ERS Load on the weather-sensitive baseline is one half (0.5) MW; all other ERS capacity offers will have a minimum amount that may be offered of one-tenth (0.1) MW. ERS Resources may be aggregated to reach this requirement.

(9) Offers from ERS Generators must include self-serve capacity and injection capacity amounts greater than or equal to zero for each ERS Time Period offered.

(10) ERCOT may establish an upper limit, in MWs, on the amount of ERS capacity it will procure for any ERS Time Period in any ERS Standard Contract Term.

(11) A QSE’s offer to provide ERS shall include:

(a) The name of the QSE representing the ERS Resource and the name of an individual authorized by the QSE to represent the QSE and its ERS Resource(s);

(b) The name of an Entity that controls the ERS Resource, and an affirmation that the QSE has obtained written authorization from the Entity to submit ERS offers on its behalf and to represent the Entity in all matters before ERCOT concerning the Entity’s provision of ERS;

(c) Any information or data specified by ERCOT, including access to historical meter data, and affirmation by the QSE that it has obtained written authorization from the controlling Entity of the ERS Resource for the QSE to obtain such data;

(d) Affirmation that the controlling Entity of the ERS Resource has reviewed P.U.C. Subst. R. 25.507, Electric Reliability Council of Texas (ERCOT) Emergency Response Service (ERS), these Protocols and Other Binding Documents relating to the provision of ERS, and has agreed to comply with and be bound by such provisions;

(e) An agreement by the QSE to produce any written authorization or agreement between the QSE and any ERS Resource it represents, as described in this Section, upon request from ERCOT or the PUCT;

(f) Affirmation that no offered capacity from any site in an ERS Resource has been or will be committed to provide any other product, service, or program during any of the hours in the ERS Time Period in the Standard Contract Term for which the offer is submitted.  Such prohibited products, services, or programs include, but are not limited to, Ancillary Services, Security-Constrained Economic Dispatch (SCED), or TDSP standard offer programs. As an exception to the foregoing, a QSE may offer a site to provide ERS for an ERS Time Period in the Standard Contract Term even if the QSE has an offer pending for that same site to serve as an MRA during that ERS Time Period and Standard Contract Term; however, if the site is selected to serve as an MRA it will not be permitted to serve as ERS during any ERS Time Period in the ERS Contract Term in which it is obligated to serve as an MRA;

(g) Affirmation that the QSE and the controlling Entity the ERS Resource are familiar with any applicable federal, state or local environmental regulations that apply to the use of any generator in the provision of ERS, and that the use of such generator(s) to provide of ERS would not violate those regulations. This provision applies to both ERS Generators and to the use of backup generation by ERS Loads; and

(h) Affirmation that each offered ERS Resource satisfies at least one of the conditions set forth in paragraph (9) of Section 3.6.1, Load Resource Participation, and that all of the ERS Resource’s offered Demand response capacity will be available if deployed by ERCOT during an emergency.

(12) Upon request from a QSE, ERCOT shall provide the dates and times for any deployment events or tests of any ERS site during the previous three ERS Standard Contract Terms, provided that the QSE has obtained written authorization from the ERS site to obtain the information from ERCOT. Such QSE requests shall include the following site-specific information: Electric Service Identifier (ESI ID), unique meter identifier (if applicable), or, if the site is in a Non-Opt-In Entity (NOIE) area, site name and site address.

(13) Sites associated with a Dynamically Scheduled Resource (DSR) may not participate in ERS. Offers for Resources containing sites associated with a DSR will be rejected by ERCOT. If ERCOT determines that any participating site is associated with a DSR, that site will be treated as removed from the Resource on the date the determination was made. An ERS Resource’s obligation will not change as a result of any such site removal.

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| ***[NPRR1000: Delete item (13) above upon system implementation and renumber accordingly.]*** |

(14) Each offer submitted by a QSE on behalf of an aggregated ERS Load on a weather-sensitive baseline shall include the QSE’s projection of the maximum number of sites in the aggregation during the ERS Standard Contract Term. ERCOT shall review this projection and the information provided regarding the initial size of each aggregated ERS Load and shall reject any offer on behalf of such an ERS Load if the maximum size of the ERS Load projected by the QSE would violate the limits of site participation growth described in paragraph (15) below.

(15) A QSE may modify the population of an aggregated ERS Load on a weather-sensitive baseline once per month during an ERS Standard Contract Term via a process defined by ERCOT. Such adjustments shall be effective on the first day of each month following the first month. A fully validated ERS Offer form must be received by ERCOT no later than seven Business Days prior to the first day of the month for which is intended to be in effect.

(a) During an ERS Standard Contract Term, a QSE may increase the number of sites in an aggregated ERS Load on a weather-sensitive baseline by no more than the greater of the following:

(i) 100% of the initial number of sites; or

(ii) Two MW times the QSE’s projection of the maximum number of sites in the aggregation during the ERS Standard Contract Term, divided by the maximum MW capacity offered for any ERS Time Period for the aggregation.

(b) Any sites added to an ERS Load on a weather-sensitive baseline are subject to the same requirements for historical meter data as the other sites in the aggregation, as described in paragraph (4) of Section 8.1.3.1.1.

(16) For each of the four ERS service types, an ERS Standard Contract Term may consist of a single ERS Contract Period or multiple non-overlapping ERS Contract Periods, as follows:

(a) If no ERS Resources’ obligations are exhausted for an ERS service type during an ERS Contract Period pursuant to Section 3.14.3.3, Emergency Response Service Provision and Technical Requirements, the ERS Contract Period for that ERS service type shall terminate at the end of the last Operating Day of the ERS Standard Contract Term.

(b) If one or more ERS Resources’ obligations in a given ERS service type are exhausted pursuant to Section 3.14.3.3, the ERS Contract Period for that ERS service type shall terminate at the end of the Operating Day during which the exhaustion occurred. However, if ERS Resources participating in a service type remain deployed at the end of that Operating Day, the ERS Contract Period for that ERS service type shall terminate at the end of the Operating Day on which those ERS Resources are recalled.

(c) If an ERS Contract Period terminates as provided in paragraph (b) above, and one or more ERS Resources’ obligations were not exhausted, a new ERS Contract Period for the ERS service type shall begin at hour ending 0100 on the following Operating Day. This new ERS Contract Period shall terminate as provided in this Section.

(d) If ERCOT elects pursuant to paragraph (b) above to renew the obligations of any ERS Resources whose obligations were entirely exhausted, a new ERS Contract Period for the ERS service type shall begin at hour ending 0100 on the Operating Day after ERCOT has notified QSEs that it has elected to renew the obligation. If a new ERS Contract Period was initiated pursuant to paragraph (c) above on an Operating Day prior to ERCOT issuing a notice of renewal under this paragraph, that ERS Contract Period shall terminate at the end of the Operating Day on which ERCOT notified QSEs that the renewal will take place. This new ERS Contract Period shall terminate as provided in this Section.

(17) An ERS Resource currently obligated to provide an ERS service type during an ERS Time Period and ERS Contract Period may be offered to provide service as an MRA during that same ERS Time Period in the ERS Contract Period. If the ERS Resource is selected to provide service as an MRA during an ERS Time Period in the ERS Contract Period in which it is currently obligated to provide an ERS service type, the ERS Contract Period will be terminated for that ERS service type. The ERS Contract Period for that ERS service type shall terminate at the end of the Operating Day that is five days before the first Operating Day the ERS Resource is obligated to provide service under the MRA Agreement. However, if any ERS Resources participating in that ERS service type are currently deployed at the end of the Operating Day the ERS Contract Period is scheduled to terminate, then the ERS Resource’s ERS Contract Period for that ERS service type shall continue until the end of the Operating Day on which all of the ERS Resources participating in that ERS service type have been recalled, at which time the ERS Contract Period will terminate.

(18) ERS Resources shall be obligated in ERS Contract Periods as follows:

(a) Unless an ERS Contract Period is terminated pursuant to paragraph (17) above, for the first ERS Contract Period in an ERS Standard Contract Term, all ERS Resources awarded by ERCOT shall be obligated.

(b) ERS Resources shall be obligated for 24 hours of cumulative deployment time for any ERS Contract Period during the December through March ERS Standard Contract Term. The obligated cumulative deployment time for any ERS Contract Period during all other ERS Standard Contract Terms shall be 12 hours.

(c) For each of any subsequent ERS Contract Periods for a given ERS service type in an ERS Standard Contract Term, any ERS Resource with remaining obligation due to cumulative deployment time of less than the maximum deployment hours specified for the ERS Standard Contract Term in paragraph (b) above at the end of the last ERS Contract Period shall be obligated for only this remaining deployment time in the new ERS Contract Period.

(d) For each of any subsequent ERS Contract Periods in an ERS Standard Contract Term, ERCOT may renew the obligations of certain ERS Resources as follows:

(i) During the offer submission process, QSEs shall designate on the ERS offer form, which is posted on the ERCOT website, whether an ERS Resource elects to participate in renewal ERS Contract Periods (“renewal opt-in”). Except as provided in paragraph (iv) below, this election is irrevocable once the ERS Resource has been committed for an ERS Standard Contract Term.

(ii) If the obligations of one or more ERS Resources are exhausted before the end of an ERS Standard Contract Term, ERCOT shall determine whether to include renewal opt-ins in the subsequent ERS Contract Period. ERCOT may limit any renewal to one or more ERS Time Periods and/or a specified MW quantity in which obligations have been exhausted.

(iii) If ERCOT decides to include renewal opt-ins in a subsequent ERS Contract Period, ERCOT shall promptly notify all ERS QSEs as to the ERS Time Periods and/or any specified MW quantity that it has elected to renew.

(iv) By the end of the second Business Day in any renewal ERS Contract Period, a QSE may revoke the renewal opt-in status of any of its committed ERS Resources for any subsequent ERS Contract Periods within that ERS Standard Contract Term. ERCOT shall develop a method for QSEs to communicate such information.

(v) By the end of the third Business Day in any ERS Contract Period other than the first ERS Contract Period in an ERS Standard Contract Term, ERCOT shall communicate to QSEs a confirmation of the terms of participation for all of their committed ERS Resources.

(19) In any 12-month period beginning on December 1st and ending on November 30th, ERCOT shall not commit dollars toward ERS in excess of the ERS cost cap, except for the purpose of renewing ERS Resource obligations during a period where ERS has been exhausted. ERCOT may determine cost limits for each ERS Standard Contract Term in order to ensure that the ERS cost cap is not exceeded.

(20) If a QSE offers a Weather-Sensitive ERS Load, selects a control group baseline for that ERS Load, and ERCOT determines that the magnitude of the offer relative to the baseline error will prevent accurate determination of the performance, ERCOT shall reject the offer.

(21) ERCOT shall reduce the available expenditure under the ERS cost cap by the value of the amount of ERS Self-Provision. ERCOT shall value ERS Self-Provision at the clearing price multiplied by the total MW of ERS Self-Provision during each relevant ERS Time Period.

(22) ERCOT shall procure ERS Resources for each ERS Time Period using a clearing price. The Emergency Response Service Procurement Methodology, posted on the ERCOT website, is an Other Binding Document that describes the methodology used by ERCOT to procure ERS. ERCOT may consider geographic location and its effect on congestion in making ERS awards. ERCOT may prorate the capacity awarded to an ERS Resource in an ERS Time Period if the capacity offered for that ERS Resource would cost more than the Emergency Response Service Procurement Methodology allows under the time period expenditure limit. Such proration shall only be done if the QSE indicates on its offer for an ERS Resource that the QSE is willing to have the capacity prorated and also has indicated the lowest prorated capacity limit which is acceptable for that ERS Resource. If proration would result in an award below an ERS Resource’s designated prorated capacity limit or below the minimum MW offer applicable to the ERS service type as specified in paragraph (8) above, the offer will not be awarded.

(23) Payments and Self-Provision credits to QSEs representing ERS Resources are subject to adjustments as described in Section 8.1.3.3, Payment Reductions and Suspension of Qualification of Emergency Response Service Resources and/or their Qualified Scheduling Entities. Deployment of ERS Resources will not result in additional payments other than any payment for which the QSE may be eligible through Real-Time energy imbalance or other ERCOT Settlement process.

(24) QSEs representing ERS Resources selected to provide ERS shall execute a Standard Form Emergency Response Service Agreement, as provided in Section 22, Attachment G, Standard Form Emergency Response Service Agreement.

6.5.9.4.1 General Procedures Prior to EEA Operations

(1) Prior to declaring EEA Level 1 detailed in Section 6.5.9.4.2, EEA Levels, ERCOT may perform the following operations consistent with Good Utility Practice:

(a) Provide Dispatch Instructions to QSEs for specific Resources to operate at an Emergency Base Point to maximize Resource deployment so as to increase PRC levels on other Resources;

(b) Commit specific available Resources as necessary that can respond in the timeframe of the emergency. Such commitments will be settled using the HRUC process;

(c) Start RMR Units available in the time frame of the emergency. RMR Units should be loaded to full capability;

(d) Utilize available Resources providing RRS, ECRS, and Non-Spin services as required;

(e) Instruct TSPs and DSPs or their agents to reduce Customer Load by using existing, in-service distribution voltage reduction measures if ERCOT determines that the implementation of these measures could help avoid entering into EEA and ERCOT does not expect to need to use these measures to reduce the amount of Load shedding that may be needed in EEA Level 3. A TSP, DSP, or their agent shall implement these instructions if distribution voltage reduction measures are available and already installed. If the TSP, DSP, or their agent determines in their sole discretion that the distribution voltage reduction would adversely affect reliability, the voltage reduction measure may be reduced, modified, or otherwise changed from maximum performance to a level of exercise that has no negative impact to reliability; and

(f) ERCOT shall use the PRC and system frequency to determine the appropriate Emergency Notice and EEA levels.

(2) When PRC falls below 3,000 MW and is not projected to be recovered above 3,000 MW within 30 minutes following the deployment of Non-Spin, ERCOT may deploy available contracted ERS-10 and ERS-30 via an XML message. The deployment time within the ERCOT XML deployment message shall represent the beginning of the ERS-10 and ERS-30 ramp periods.

(a) ERS-10 and ERS-30 may be deployed at any time in a Settlement Interval. ERS-10 and ERS-30 may be deployed either simultaneously or separately, and in any order, at the discretion of ERCOT operators.

(b) Upon deployment, QSEs shall instruct their ERS Resources in ERS-10 and ERS-30 to perform at contracted levels consistent with the criteria described in Section 8.1.3.1.4, Event Performance Criteria for Emergency Response Service Resources, until either ERCOT releases the ERS-10 and ERS-30 deployment or the ERS-10 and ERS-30 Resources have reached their maximum deployment time.

(c) ERCOT shall notify QSEs of the recall of ERS-10 and ERS-30 via an XML message. The recall time within the ERCOT XML message shall represent the official notice of ERS-10 and ERS-30 recall.

(d) Upon release, an ERS Resource shall return to a condition such that it is capable of meeting its ERS performance requirements as soon as practical, but no later than ten hours following the release.

(3) When a Watch is issued for PRC below 3,000 MW and ERCOT expects system conditions to deteriorate to the extent that an EEA Level 2 or 3 may be experienced, ERCOT shall evaluate constraints active in SCED and determine which constraints have the potential to limit generation output.

(a) Upon identification of such constraints, ERCOT shall coordinate with the TSPs that own or operate the overloaded Transmission Facilities associated with those constraints, as well as the Resource Entities whose generation output may be limited, to determine whether:

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| [NPRR857: Replace paragraph (a) above with the following upon system implementation and satisfying the following conditions: (1) Southern Cross provides ERCOT with funds to cover the entire estimated cost of the project; and (2) Southern Cross has signed an interconnection agreement with a TSP and the TSP gives ERCOT written notice that Southern Cross has provided it with: (a) Notice to proceed with the construction of the interconnection; and (b) The financial security required to fund the interconnection facilities:](a) Upon identification of such constraints, ERCOT shall coordinate with the TSPs and DCTOs that own or operate the overloaded Transmission Facilities associated with those constraints, as well as the Resource Entities whose generation output may be limited, to determine whether: |

(i) A 15-Minute Rating is available to allow for additional transmission capacity for use in congestion management, if an EEA Level 2 or 3 is declared, and post-contingency actions can be taken within 15 minutes to return the flow to within the Emergency Rating. Such actions may include, but are not limited to, reducing the generation that increased output as a result of enforcing the 15-Minute Rating rather than the Emergency Rating;

(ii) Post-contingency loading of the Transmission Facilities is expected to be at or below Normal Rating within two hours; or

(iii) Additional transmission capacity could allow for additional output from a limited Generation Resource by taking one of the following actions:

(A) Restoring Transmission Elements that are out of service;

(B) Reconfiguring the transmission system; or

(C) Making adjustments to phase angle regulator tap positions.

If ERCOT determines that one of the above-mentioned actions allows for additional output from a limited Generation Resource, ERCOT may instruct the TSPs to take the action(s) during the Watch to allow for additional output from the limited Generation Resource.

(b) ERCOT shall also coordinate with TSPs who own and operate the Transmission Facilities associated with the double-circuit contingencies for the constraints identified above to determine whether the double-circuit failures are at a high risk of occurring due to system conditions, which may include: severe weather conditions forecasted by ERCOT in the vicinity of the double circuit, weather conditions that indicate a high risk of insulator flashover on the double circuit, repeated Forced Outages of the individual circuits that are part of the double circuit in the preceding 48 hours, or fire in progress in the right of way of the double circuit.

(c) The actions detailed in this Section shall be supplemental to the development and maintenance of CMPs as otherwise directed by the Protocols or Operating Guides.

(4) When a Watch is issued for PRC below 3,000 MW, QSEs shall suspend any ongoing ERCOT-required Resource performance testing.

6.5.9.4.2 EEA Levels

(1) ERCOT will declare an EEA Level 1 when PRC falls below 2,500 MW and is not projected to be recovered above 2,500 MW within 30 minutes without the use of the following actions that are prescribed for EEA Level 1:

(a) ERCOT shall take the following steps to maintain steady state system frequency near 60 Hz and maintain PRC above 2,000 MW:

(i) Request available Generation Resources that can perform within the expected timeframe of the emergency to come On-Line by initiating manual HRUC or through Dispatch Instructions;

(ii) Use available DC Tie import capacity that is not already being used;

(iii) Issue a Dispatch Instruction for Resources to remain On-Line which, before start of emergency, were scheduled to come Off-Line; and

(iv) Instruct QSEs to deploy undeployed ERS-10 and ERS-30.

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| [NPRR1010: Insert paragraph (v) below upon system implementation of the Real-Time Co-Optimization (RTC) project:](v) At ERCOT’s discretion, manually deploy, through ICCP, available RRS and ECRS capacity from Generation Resources having a Resource Status of ONSC and awarded RRS or ECRS. |

(b) QSEs shall:

(i) Ensure COPs, telemetered status, and telemetered HSLs are updated and reflect all Resource delays and limitations; and

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| [NPRR1010: Replace paragraph (i) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:](i) Ensure COPs, telemetered status, telemetered HSLs, Normal Ramp Rates, Emergency Ramp Rates, and Ancillary Service capabilities are updated and reflect all Resource delays and limitations; and |

(ii) Ensure that each of its ESRs suspends charging until the EEA is recalled, except under the following circumstances:

(A) The ESR has a current SCED Base Point Instruction, LFC Dispatch Instruction, or manual Dispatch Instruction to charge the ESR;

(B) The ESR is actively providing Primary Frequency Response; or

(C) The ESR is co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System, in which case the ESR may continue to charge as long as maximum output to the ERCOT System is maintained.

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| [NPRR995: Replace paragraph (ii) above with the following upon system implementation:](ii) Ensure that each of its ESRs and SOESSs suspends charging until the EEA is recalled, except under the following circumstances:(A) The ESR has a current SCED Base Point Instruction, LFC Dispatch Instruction, or manual Dispatch Instruction to charge the ESR; (B) The ESR or SOESS is actively providing Primary Frequency Response; or (C) The ESR or SOESS is co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System, in which case the ESR may continue to charge as long as maximum output to the ERCOT System is maintained. |

(2) ERCOT may declare an EEA Level 2 when the clock-minute average system frequency falls below 59.91 Hz for 15 consecutive minutes. ERCOT will declare an EEA Level 2 when PRC falls below 2,000 MW and is not projected to be recovered above 2,000 MW within 30 minutes without the use of the following actions that are prescribed for EEA Level 2:

(a) In addition to the measures associated with EEA Level 1, ERCOT shall take the following steps to maintain steady state system frequency at a minimum of 59.91 Hz and maintain PRC above 1,500 MW:

(i) Instruct TSPs and DSPs or their agents to reduce Customer Load by using existing, in-service distribution voltage reduction measures that have not already been implemented. A TSP, DSP, or their agent shall implement these instructions if distribution voltage reduction measures are available and already installed. If the TSP, DSP, or their agent determines in their sole discretion that the distribution voltage reduction would adversely affect reliability, the voltage reduction measure may be reduced, modified, or otherwise changed from maximum performance to a level of exercise that has no negative impact to reliability.

(ii) Instruct TSPs and DSPs to implement any available Load management plans to reduce Customer Load.

(iii) Instruct QSEs to deploy ECRS or RRS (controlled by high-set under-frequency relays) supplied from Load Resources. ERCOT may deploy ECRS or RRS simultaneously or separately, and in any order. ERCOT shall issue such Dispatch Instructions in accordance with the deployment methodologies described in paragraph (iv) below.

(iv) Load Resources providing ECRS that are not controlled by high-set under-frequency relays shall be deployed prior to Group 1 deployment. ERCOT shall deploy ECRS and RRS capacity supplied by Load Resources (controlled by high-set under-frequency relays) in accordance with the following:

(A) Instruct QSEs to deploy RRS with a Group 1 designation and all of the ECRS that is supplied from Load Resources (controlled by high-set under-frequency relays) by instructing the QSE representing the specific Load Resources to interrupt Group 1 Load Resources providing ECRS and RRS. QSEs shall deploy Load Resources according to the group designation and will be given some discretion to deploy additional Load Resources from any of the groups not designated for deployment if Load Resource operational considerations require such. ERCOT shall issue notification of the deployment via XML message. The deployment time within the ERCOT XML deployment message shall initiate the ten-minute deployment period;

(B) At the discretion of the ERCOT Operator, instruct QSEs to deploy RRS that is supplied from Load Resources (controlled by high-set under-frequency relays) by instructing the QSE representing the specific Load Resource to interrupt additional Load Resources providing RRS based on their group designation. ERCOT shall issue notification of the deployment via XML message. The deployment time within the ERCOT XML deployment message shall initiate the ten-minute deployment period;

(C) The ERCOT Operator may deploy Load Resources providing only ECRS (not controlled by high-set under-frequency relays) and all groups of Load Resources providing RRS and ECRS at the same time. ERCOT shall issue notification of the deployment via XML message. The deployment time within the ERCOT XML deployment message shall initiate the ten-minute deployment period; and

(D) ERCOT shall post a list of Load Resources on the MIS Certified Area immediately following the DRUC for each QSE with a Load Resource obligation which may be deployed to interrupt under paragraph (A) and paragraph (B). ERCOT shall develop a process for determining which individual Load Resource to place in each group based on a random sampling of individual Load Resources. At ERCOT’s discretion, ERCOT may deploy all Load Resources at any given time during EEA Level 2.

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| [NPRR1010: Replace paragraph (D) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:](D) ERCOT shall post a list of Load Resources on the MIS Certified Area immediately following the DRUC for each QSE with a Load Resource RRS or ECRS award, which may be deployed to interrupt under paragraph (A) and paragraph (B). ERCOT shall develop a process for determining which individual Load Resource to place in each group based on a random sampling of individual Load Resources. At ERCOT’s discretion, ERCOT may deploy all Load Resources at any given time during EEA Level 2. |

(v) Unless a media appeal is already in effect, ERCOT shall issue an appeal through the public news media for voluntary energy conservation; and

(vi) With the approval of the affected non-ERCOT Control Area, TSPs, DSPs, or their agents may implement transmission voltage level BLTs, which transfer Load from the ERCOT Control Area to non-ERCOT Control Areas in accordance with BLTs as defined in the Operating Guides.

(b) Confidentiality requirements regarding transmission operations and system capacity information will be lifted, as needed to restore reliability.

(3) ERCOT may declare an EEA Level 3 when the clock-minute average system frequency falls below 59.91 Hz for 20 consecutive minutes or when steady-state frequency falls below 59.8 Hz. ERCOT will declare an EEA Level 3 when PRC cannot be maintained above 1,500 MW or when the clock-minute average system frequency falls below 59.91 Hz for 25 consecutive minutes. Upon declaration of an EEA Level 3, ERCOT shall take any of the following measures as necessary to recover frequency or PRC to the minimum required levels:

(a) Instruct ESRs to suspend charging. For ESRs, ERCOT shall issue the suspension instruction via a SCED Base Point instruction, or, if otherwise necessary, via a manual Dispatch Instruction. An ESR shall suspend charging unless it is providing Primary Frequency Response, has received a charging instruction via SCED Base Point, or is carrying Reg-Down and has received a charging instruction from LFC. However, an ESR co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System may continue to charge as long as maximum output to the ERCOT System is maintained.

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| [NPRR995: Replace paragraph (a) above with the following upon system implementation:](a) Instruct ESRs to suspend charging. For ESRs, the suspension instruction shall be issued via a SCED Base Point, or, if otherwise necessary, via a manual Dispatch Instruction. An ESR shall suspend charging unless it is providing Primary Frequency Response, has received a charging instruction via SCED Base Point, or is carrying Reg-Down and has received a charging instruction from LFC. An SOESS shall suspend charging unless it is providing Primary Frequency Response. However, an ESR or SOESS co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System may continue to charge as long as maximum output to the ERCOT System is maintained. |

(b) Direct all TOs to shed firm Load, in 100 MW blocks, distributed as documented in the Operating Guides in order to maintain a steady state system frequency at a minimum of 59.91 Hz and to recover 1,500 MW of PRC within 30 minutes.

(i) TOs and TDSPs may shed Load connected to under-frequency relays pursuant to an ERCOT Load shed directive issued during EEA Level 3 so long as each affected TO continues to comply with its Under-Frequency Load Shed (UFLS) obligation as described in Nodal Operating Guide Section 2.6.1, Automatic Firm Load Shedding, and its Load shed obligation as described in Nodal Operating Guide Section 4.5.3.4, Load Shed Obligation.

(c) Implement any appropriate measures associated with EEA Levels 1 and 2 that have not already been implemented.

***8.1.3.3.3 Performance Criteria for Qualified Scheduling Entities Representing Non-Weather-Sensitive Emergency Response Service Resources***

(1) A QSE’s ERS performance will be evaluated based on its portfolio’s performance for each of the four ERS service types during ERS deployment events and on the overall availability of its portfolio in an ERS Standard Contract Term, as follows:

(a) Availability:

(i) ERCOT shall calculate a portfolio-level availability factor for each QSE’s ERS portfolio for each ERS service type for each ERS Time Period in an ERS Contract Period using the methodologies defined in Section 8.1.3.1.3, Availability Criteria for Emergency Response Service Resources, except that the availability factor for each ERS Time Period will be allowed to exceed 1.0. ERCOT shall then calculate a single time- and capacity-weighted availability factor for the QSE portfolio for each ERS service type for the ERS Contract Period using the methodologies defined in Section 8.1.3.1.3.

(ii) ERCOT shall then calculate a single time and capacity-weighted availability factor for the QSE portfolio for the ERS Standard Contract Term and the ERS service type, which will be capped at 1.0.

(A) For an ERS Standard Contract Term with a single ERS Contract Period, the QSE portfolio-level availability factor for each ERS service type for the ERS Standard Contract Term shall be the portfolio-level availability factor for each ERS service type for the ERS Contract Period.

(B) For an ERS Standard Contract Term with multiple ERS Contract Periods, ERCOT shall compute a QSE portfolio-level availability factor for each ERS service type for the ERS Standard Contract Term by averaging the QSE’s availability factors across ERS Contract Periods and ERS Time Periods for each ERS service type, weighted according to time and capacity obligations.

(iii) The QSE’s portfolio-level availability factor for each ERS service type for the ERS Standard Contract Term will determine both the availability component of the ERS payment to the QSE and whether the QSE has met its ERS availability requirements. If the QSE’s portfolio-level availability factor for each ERS service type for the ERS Standard Contract Term equals or exceeds 0.95, the QSE shall be deemed to have met its availability requirements for the ERS Standard Contract Term; otherwise, the QSE shall be deemed to have failed to meet this requirement. If the QSE’s portfolio-level availability factor for either ERS service type for the ERS Standard Contract Term is less than 1.0, the QSE’s ERS capacity payment shall be reduced according to the formulas in Section 6.6.11.1, Emergency Response Service Capacity Payments.

(b) Event Performance:

(i) QSEs representing ERS Resources must meet performance standards specified in Section 8.1.3.1.4, Event Performance Criteria for Emergency Response Service Resources, as applied on a portfolio-level basis. ERCOT shall determine a QSE’s portfolio-level event performance for each ERS service type by calculating a QSE portfolio-level event performance factor for each ERS deployment event. For purposes of evaluating ERS Loads, ERCOT shall establish a baseline representing the portfolio’s estimated Load, or, for DRG that has been designated by the QSE to be evaluated by using its native load, calculated 15-minute interval native load data in the absence of the ERS deployment event. For purposes of evaluating ERS Generators, ERCOT shall compute portfolio-level injection of energy to the ERCOT System. Using this data, ERCOT shall calculate a QSE portfolio-level event performance factorfor each ERS deployment event for each ERS service type based on the weighted average of the event interval performance factors, weighted by the total obligation and IntFrac.

(ii) ERCOT shall then calculate an ERSEPF*qrd* for the ERS Standard Contract Term, which will be capped at 1.0. For an ERS Standard Contract Term with no ERS deployment events, the ERSEPF*qrd* for the ERS Standard Contract Term shall be set to 1.0.

(A) For an ERS Standard Contract Term with a single ERS deployment event, the ERSEPF*qrd* for the ERS Standard Contract Term shall be the QSE portfolio-level event performance factor for the event.

(B) For an ERS Standard Contract Term with multiple ERS deployment events, ERCOT shall compute the ERSEPF*qrd* for the ERS Standard Contract Term by averaging the QSE portfolio-level interval performance factors for all of the deployment events for each ERS service type, weighted by the total obligation and IntFrac.

(iii) The ERSEPF*qrd* for an ERS Standard Contract Term will determine both the event performance component of the ERS payment to the QSE and whether the QSE has met its ERS event performance requirements for that ERS service type. If an ERSEPF*qrd* for an ERS Standard Contract Term is greater than or equal to 0.95, the QSE will be deemed to have met its event performance requirements for the ERS Standard Contract Term for that ERS service type; otherwise, the QSE shall be deemed to have failed to meet this requirement. If a QSE’s ERSEPF*qrd* is less than 1.0 for the Standard Contract Term, the QSE’s ERS capacity payment shall be reduced according to the formulas in Section 6.6.11.1. For purposes of calculating an ERSEPF*qrd*, any ERS Resource that was not subject to Dispatch during the event shall be treated as having met its obligation.

(iv) ERCOT will not include any Resources in the calculation of the ERSEPF*qrd* if one or more sites of an ERS Resource were disabled or unverifiable due to events on the TDSP side of the meter affecting the supply, delivery or measurement of electricity either during the event or prior that impacts the creation of a credible baseline. QSEs must provide verification of such events from the TDSP or MRE.

(c) Ten-minute Deployment: Within ten minutes of the deployment time within the ERCOT XML deployment message for ERS-10, a QSE shall ensure that each ERS Resource participating in ERS-10 in its portfolio deploys in accordance with its obligations. For each ERS-10 deployment event, ERCOT shall assess each QSE’s compliance with this requirement by calculating a capacity-weighted QSE portfolio-level interval performance factor for the first full interval of the Sustained Response Period, using the methodologies defined in Section 8.1.3.1.4.

(d) Thirty-minute Deployment: Within 30 minutes of the deployment time within the ERCOT XML deployment message for ERS-30, a QSE shall ensure that each ERS Resource participating in its portfolio deploys in accordance with its obligations. For each ERS-30 deployment event, ERCOT shall assess each QSE’s compliance with this requirement by calculating a capacity-weighted QSE portfolio-level interval performance factor for the first full interval of the Sustained Response Period, using the methodologies defined in Section 8.1.3.1.4.

The above variables are defined as follows:

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| Variable | Unit | Description |
| ERSEPF *qrd* | None | *ERS Event Performance Factor per QSE per ERS Standard Contract Term per ERS Service Type*—Event performance factor for QSE *q* in ERS Standard Contract Term *r* and ERS service type *d* as calculated pursuant to Section 8.1.3.3.1. |
| *q* | None | A QSE. |
| *r* | None | ERS Standard Contract Term. |
| *d* | None | ERS service type (Non-Weather-Sensitive ERS-10 or Non-Weather-Sensitive ERS-30). |

(2) Failure by a QSE portfolio to meet its ERS event performance or availability requirements shall not be cause for revocation of the QSE’s Ancillary Services qualification.