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| VCMRR Number | [044](https://www.ercot.com/mktrules/issues/VCMRR044) | VCMRR Title | RTC+B – Mitigated Offer Cap for Hydro Generation Resources |
| Date Posted | April 22, 2025 |
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| Requested Resolution  | Normal  |
| Verifiable Cost Manual Sections Requiring Revision  | Appendix 10: Setting the Variables Used in the Mitigated Offer Cap for Hydro Generation Resources (new) |
| Related Documents Requiring Revision/Related Revision Requests | None |
| Revision Description | This Verifiable Cost Manual Revision Request (VCMRR) adds a procedure to Appendix 10 for setting the variables used in the Mitigated Offer Cap (MOC) for hydro Generation Resources: setting Variable O&M (VOM) to the Real-Time System-Wide Offer Cap (RTSWCAP) and the incremental heat rate value to zero. These settings ensure that the MOC for such Resources is at least equal to or greater than the RTSWCAP.  |
| 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 | Key Principle (KP) 1.3(3) as established by the Real-Time Co-optimization Task Force (RTCTF) and approved by the ERCOT Board of Directors (Board), requires that On-Line hydro Generation Resources not operating in Synchronous Condenser Fast-Response mode will be able to maintain Responsive Reserve (RRS), Non-Spinning Reserve (Non-Spin), and ERCOT Contingency Reserve Service (ECRS) through modification of the MOC. In addition, combined comments submitted to KP1.3 further state that under Real-Time Co-optimization (RTC), On-Line hydro Generation Resources not operating in Synchronous Condenser Fast-Response mode must adhere to constraints imposed by governmental agencies or by treaty regarding the operations of those Resources.  These Resources often have the opportunity to provide incremental energy in response to an Ancillary Service deployment and are therefore good candidates to provide Ancillary Service(s), but cannot regularly exchange the Ancillary Service capacity for an incremental energy deployment.  Hence, the MOC for On-Line hydro Generation Resources shall be set equal to the submitted Energy Offer Curve. Given constraints on hydro Generation Resources as described above and that these Resources are not dispatched by Security-Constrained Economic Dispatch (SCED) when operating in Synchronous Condenser Fast-Response mode, ERCOT proposes setting the VOM to the RTSWCAP and the incremental heat rate value to zero to ensure that the MOC is at least equal to or greater than the RTSWCAP.  |

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| Market Segment | Not applicable |

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| Proposed Verifiable Cost Manual Language Revision |

**Appendix 10: Setting the Variables Used in the Mitigated Offer Cap for Hydro Generation Resources**

**Description**

For hydro Generation Resources, the Variable Operation and Maintenance (VOM) cost used in the Mitigated Offer Cap (MOC) shall be set to the Real-Time System-Wide Offer Cap (RTSWCAP). In addition, for such Generation Resources, the incremental heat rate values used in the MOC shall be set equal to zero. Hence, for purposes of applying these values to the MOC, hydro Generation Resources will be treated as if they had approved Verifiable Costs for costs above their Low Sustained Limit (LSL).