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| NPRR Number | [1282](https://www.ercot.com/mktrules/issues/NPRR1282) | NPRR Title | Ancillary Service Duration under Real-Time Co-Optimization |
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| Date | May 12, 2025 |
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| Submitter’s Information |
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| Cell Number |  |
| Market Segment | Not applicable |

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| Comments |

ERCOT appreciates stakeholder consideration of Nodal Protocol Revision Request (NPRR) 1282 and provides the following comments regarding the timeline to approve the Revision Request.

As stated in the “Reason for Revision” for NPRR1282, ERCOT has provided reliability analysis and considerations of why the ERCOT-proposed duration parameters are the appropriate parameters for Real-Time Co-optimization Plus Batteries (RTC+B) go-live on December 5, 2025. ERCOT agrees that these parameters can be revisited after go-live when there is history with the RTC+B systems implemented and observations regarding market and reliability outcomes.

In the immediate timeframe, ERCOT believes it is important to move forward with finalizing the parameters with approval of NPRR1282 for consideration at the June 24, 2025 ERCOT Board of Directors (Board) meeting. While ERCOT is still open to discussion of other points of view, it is essential to approve Ancillary Service (“AS”) durations for the market trials by July 7, 2025 when RTC-Security Constrained Economic Dispatch (SCED) is up and running in the market trials environment. This is needed for both ERCOT and all Market Participants to confirm the mechanics and observe the Real-Time pricing and Dispatch outcomes in this complex market design change.

ERCOT offers at least two paths for stakeholders to consider in moving forward on changing parameters for AS duration:

1. Consider NPRR1282 through the May Protocol Revision Subcommittee (PRS), May Technical Advisory Committee (TAC), and June 24 Board meeting. Comments can continue to be considered and language potentially changed as part of what goes to the Board for consideration and approval.
2. Alternative proposals can go into a separate NPRR(s) with a stakeholder path of the September 23, 2025 Board meeting.

While this second path achieves more time for stakeholders to evaluate alternate parameters, ERCOT highlights that it will create risk of either limited or no testing before RTC+B go-live on December 5, 2025. It should also be noted that some of the alternative approaches being discussed are more complex than updating parameters and cannot be in scope for RTC+B go-live.

ERCOT appreciates the timely consideration of NPRR1282.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None