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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 13, 2025 |
|  |  |
| Submitter’s Information |
| Name | Mark Stover |
| E-mail Address | marks@txsolarstorage.org |
| Company | Texas Solar and Storage Association (TSSA) |
| Phone Number |  |
| Cell Number | 512-826-5516 |
| Market Segment | Not applicable |

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| Comments |

The Texas Solar + Storage Association (TSSA) submits these comments to Nodal Protocol Revision Request (NPRR) 1282 for consideration at the May 14th Protocol Revision Subcommittee (PRS) meeting in response to the comments that have been filed by Jupiter Power, ERCOT, the Joint Commenters (Jupiter Power LLC and Engie NA), and the Independent Market Monitor (IMM).

Given that ERCOT’s view is that some parameters must be approved prior to Real-Time Co-optimization (RTC) go-live related to State of Charge (SOC), TSSA agrees with the concerns expressed by Jupiter Power and the Joint Commenters that the RTC-SCED or SOC enforcement requirements proposed by ERCOT in NPRR1282 will be unnecessarily and administratively restrictive of the amount of MW a Resource, specifically an Energy Storage Resource (ESR), can offer. In addition, we agree with the concerns raised by the IMM that NPRR1282 could distort market incentives during scarcity conditions negatively impacting reliability and prices. To address these concerns and to support ERCOT’s desire for the ERCOT Board of Directors to consider this NPRR at its June meeting so that the Ancillary Service duration values can be incorporated in the RTC market trials environment prior to go-live, TSSA endorses the proposal of the Joint Commenters included in its May 12, 2025 comments which decouples the qualification values based on ERCOT’s proposal from the RTC-SCED/SOC enforcement requirements based on TSSA’s May 4, 2025 Proposal:

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| **RTC** |
| Ancillary Service | Qualification Requirement  | RTC-SCED/SOC Enforcement Requirement  |
| Non-Spin Reserve Service  | 4 hours | 1 hours  |
| ECRS | 1 hour | 15 minutes |
| Regulation Service  | 30 minutes | 15 minutes |
| RRS | 30 minutes | 15 minutes |

TSSA urges PRS to grant NPRR1282 urgent status and to recommend approval of NPRR1282 as amended by Jointer Commenters’ May 12, 2025 comments.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None