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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 27, 2025 |
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| Submitter’s Information |
| Name | Judd Messer, Texas Vice President |
| E-mail Address | Judd.Messer@poweralliance.org |
| Company | Advanced Power Alliance (APA) |
| Phone Number | 254-230-0620 |
| Cell Number |  |
| Market Segment | Independent Generators |

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| Comments |

The Advanced Power Alliance (APA) appreciates the opportunity to provide comments on Nodal Protocol Revision Request (NPRR) 1282. APA agrees with the comments of the Independent Market Monitor (IMM), Jupiter Power, Joint Commenters (Jupiter Power and Engie), and Texas Solar Power Association (TSSA).

Specifically, APA agrees with commenters that the RTC-SCED or State of Charge (SOC) requirements proposed by ERCOT in NPRR1282 are unnecessarily and administratively restrictive of the number of megawatts an Energy Storage Resource (ESR) can offer. As Jupiter Power states in both its written comments and in stakeholder discussions, a four-hour SOC requirement for Non-Spinning Reserve (Non-Spin) for a five-minute Real-Time physical award means that an ESR will need to maintain 48 times the amount of SOC that is needed to fulfill an award in Real-Time. This example illustrates that the requirements in NPRR1282 arbitrarily place restrictions on the ability of ESRs to supply their maximum output for the benefit of the grid effectively stranding megawatts of power and restricting the ability of ESRs to provide grid services during peak demand periods by limiting access to the energy held by ESRs.

In their comments, the IMM presented a problematic example of the consequences of the provisions in NPRR1282 highlighting that if the duration requirement for Non-Spin is set at four hours for both qualification and in RTC-SCED then, an ESR would only be able to sell either 25 MW of Non-Spin or 100 MW of energy. Given that the ESR under this condition can only monetize a quarter of its capacity to sell Non-Spin, ESRs are more likely to sell their energy rather than carry operating reserves which will negatively impact the reliability of the grid, decrease the competitiveness of the Ancillary Service market, and drive up consumer costs. A better outcome for the market as described in the IMM comments would be for an ESR to be able to carry 25 MW of Non-Spin and sell as much as 75 MW of energy. NPRR1282’s SOC requirements limit the operational flexibility of ESRs by constraining an ESR’s ability to offer their full output making it more difficult to utilize one of the most efficient, fast-acting, flexible and cost-effective Resources on the grid at this time.

ERCOT is experiencing unprecedented load growth from population and commercial and industrial load, as well as uncertainties stemming from increased thermal forced outages and higher penetration from variable resources. As the grid continues to evolve, it must also adapt and ESRs are an important, fast-acting, and flexible part of the resource mix that increases grid reliability. There is a need for dispatchable Generation Resources that can operate regardless of the weather conditions and that are not reliant on external fuel supply for their power. ESRs provide both and do so almost instantaneously.

We ask that ERCOT reconsider the duration requirements in NPRR1282 and align with the IMM’s recommendations.

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| Revised Cover Page Language |

None at this time

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| Revised Proposed Protocol Language |

None at this time