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| NPRR Number | [1281](https://www.ercot.com/mktrules/issues/NPRR1281) | NPRR Title | Improvements to Alternate FFSS Resource Designation |
| Date of Decision | | May 14, 2025 | |
| Action | | Recommended Approval | |
| Timeline | | Normal | |
| Proposed Effective Date | | To be determined | |
| Priority and Rank Assigned | | To be determined | |
| Nodal Protocol Sections Requiring Revision | | 3.14.5, Firm Fuel Supply Service | |
| Related Documents Requiring Revision/Related Revision Requests | | None | |
| Revision Description | | This Nodal Protocol Revision Request (NPRR) strengthens the relationship between the Settlement of Firm Fuel Supply Service (FFSS) and operations by clarifying the FFSS Hourly Rolling Equivalent Availability Factor language to ensure the accurate calculation of the Firm Fuel Supply Service Standby Fee. | |
| 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 | | Since its inception in 2022, the FFSS has supported resource adequacy during winter hours with the largest reliability risk. FFSS has been improved by ERCOT and stakeholders following each winter contract period as operators incorporate lessons learned into the subsequent contract period.  Recent efforts to expand the service to include Firm Fuel Supply Service Resources (FFSSRs) supplied by firm natural gas contracts will broaden the pool of primary and alternate FFSSRs. These changes will increase the frequency of communication between the ERCOT control room and FFSSR operators during the winter contract period. It is critical that ERCOT operators have a near Real-Time understanding of when a primary FFSSR becomes unavailable and is replaced by an alternate FFSSR during the winter contract period. As with other Real-Time reliability actions, this communication is best facilitated with a phone call.  Furthermore, FFSS Settlement requires the calculation of a Firm Fuel Supply Service Availability Flag per QSE per Resource by hour (FFSSAFLAG) which assesses the hourly availability of primary and alternate FFSSRs throughout the contract period. Currently, this is accomplished through manual updates to Settlement systems which rely on emails to [FFSS@ercot.com](mailto:FFSS@ercot.com). Relying on the manual transcription of details given in emails for Settlement purposes creates an unnecessary risk for both ERCOT Staff and the Qualified Scheduling Entity (QSE). It is the intent of this NPRR for ERCOT to transition to an automated calculation of the FFSSAFLAG by leveraging the existing information provided by the QSE in the submission of the FFSSR Availability Plan. | |
| PRS Decision | | On 5/14/25, PRS voted unanimously to recommend approval of NPRR1281 as submitted. All Market Segments participated in the vote. | |
| Summary of PRS Discussion | | On 5/14/25, participants reviewed NPRR1281. | |
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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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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| None |  |
|  |  |
| **Market Rules Notes** | |

None

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| Proposed Protocol Language Revision |

***3.14.5 Firm Fuel Supply Service***

(1) Each Generation Resource providing or offering to provide Firm Fuel Supply Service (FFSS), including the primary and any alternate Generation Resources identified in the FFSS Offer Submission Form, must meet technical requirements specified in Section 8.1.1, QSE Ancillary Service Performance Standards, and Section 8.1.1.1, Ancillary Service Qualification and Testing.

(2) ERCOT shall issue an RFP by August 1 of each year soliciting offers from QSEs for Generation Resources to provide FFSS. The RFP shall require offers to be submitted on or before September 1of each year.

(3) QSEs may submit offers individually for one or more Generation Resources to provide FFSS using the FFSS Offer Submission Form posted on the ERCOT website. A QSE may not submit an offer for a given Generation Resource unless it is the QSE designated by the Resource Entity associated with that Generation Resource. ERCOT must evaluate offers using criteria identified in an appendix to the RFP. ERCOT will issue FFSS awards by September 30 and will post the awards to the MIS Certified Area for each QSE that is awarded an FFSS obligation. The posting will include information such as, but not limited to, the identity of the primary Generation Resource and any alternate Generation Resource(s), the FFSS clearing price, the amount of reserved fuel associated with the FFSS award, the MW amount awarded, and the Generation Resource’s initial minimum LSL when providing FFSS. The RFP awards shall cover a period beginning November 15 of the year in which the RFP is issued and ending on March 15 of the year after the year in which the RFP is issued. A QSE may submit an offer for one or more Generation Resources to provide FFSS beginning in the same year the RFP is issued or as otherwise specified in the RFP. An FFSS Resource (FFSSR) shall be considered an FFSSR and is required to provide FFSS from November 15 through March 15 for each year of the awarded FFSS obligation period. ERCOT shall ensure FFSSRs are procured and deployed as necessary to maintain ERCOT System reliability during, or in preparation for, a natural gas curtailment or other fuel supply disruption.

(a) On the FFSS Offer Submission Form, the QSE shall disclose information including, but not limited to, the Generation Resource and any alternate Generation Resource(s), the amount of reserved fuel offered, the MW available from the capacity offered, an estimate of the time to restock fuel reserves, and each limitation of the offered Generation Resource that could affect the Generation Resource’s ability to provide FFSS.

(b) If the QSE offers a Generation Resource as meeting the qualification requirements in paragraph (1)(c) of Section 8.1.1.2.1.6, Firm Fuel Supply Service Resource Qualification, Testing, Decertification, and Recertification, the QSE must submit as part of its offer a certification for the offered Generation Resource. The certification must include:

(i) Certification that the Generation Entity for the Generation Resource (or an Affiliate) has a Firm Transportation Agreement, firm natural gas supply, and contracted or owned storage capacity meeting the qualification requirements in paragraph (1)(c) of Section 8.1.1.2.1.6;

(ii) The following information regarding the Firm Transportation Agreement:

(A) FFSS Qualifying Pipeline name;

(B) Term;

(C) Primary points of receipt and delivery;

(D) Maximum daily contract quantity (in MMBtu);

(E) Shipper of record; and

(F) Whether the Firm Transportation Agreement provides for ratable receipts and deliveries; and

(iii) The following information regarding the storage arrangements:

(A) Storage facility name;

(B) Term of the Firm Gas Storage Agreement (if applicable);

(C) Maximum storage quantity owned or contracted under the Firm Gas Storage Agreement (in MMBtu); and

(D) Maximum daily withdrawal quantity (in MMBtu).

(c) For a Generation Resource to be eligible to receive an FFSS award, the primary Generation Resource and any alternate Generation Resource(s) identified in the FFSS Offer Submission Form shall complete all applicable testing requirements as specified in Section 8.1.1.2.1.6. A QSE representing an FFSSR is allowed to provide the FFSS with an alternate Resource previously approved by ERCOT to replace the FFSSR.

(d) An offer to provide FFSS is an offer to supply an awarded amount of capacity, maintain a sufficient amount of reserved fuel to meet that award for the duration requirement specified in the RFP, and to designate a specific number of emissions hours that will be reserved for the awarded FFSSR in meeting its obligation to perform in the event that FFSS is deployed. Reserved fuel, emissions hours, and other attributes, in excess of what is needed to meet the FFSS obligation can be used at the discretion of the QSE as long as sufficient fuel reserves and emissions hours are maintained for the purposes of ERCOT deployment of FFSS.

(e) Within ten Business Days of issuing FFSS awards, ERCOT will post on the ERCOT website the identity of all Generation Resources that were offered as primary Generation Resources or alternate Generation Resources to provide FFSS for the most recent procurement period, including prices and quantities offered.

(4) The QSE for an FFSSR shall ensure that the Resource is prepared and able to come On-Line or remain On-Line in order to maintain Resource availability in the event of a natural gas curtailment or other fuel supply disruption.

(a) When ERCOT issues a Watch for winter weather, ERCOT will notify all Market Participants, including all QSEs representing FFSSRs, to begin preparation for potential FFSS deployment. Such preparation may include, but is not limited to, circulation of alternate fuel to its facilities, if applicable; heat fuel oil to appropriate temperatures, if applicable; call out additional personnel as necessary, and be ready to receive a Dispatch Instruction to provide FFSS. An FFSSR may begin consuming a minimum amount of alternate fuel to validate it is ready for an FFSS deployment.

(b) In anticipation of or in the event of a natural gas curtailment or other fuel supply disruption to an FFSSR, the QSE shall notify ERCOT as soon as practicable and may request approval to deploy FFSS to generate electricity. ERCOT shall evaluate system conditions and may approve the QSE’s request. The QSE shall not deploy the FFSS unless approved by ERCOT. Upon approval to deploy FFSS, ERCOT shall issue an FFSS Verbal Dispatch Instruction (VDI) to the QSE. ERCOT may issue separate VDIs for each Operating Day for each FFSSR that is deployed for FFSS.

(c) In conjunction with a QSE notification under paragraph (b) above, the QSE shall also report to ERCOT any environmental limitations that would impair the ability of the FFSSR to provide FFSS for the required duration of the FFSS award.

(d) ERCOT may issue an FFSS VDI without a request from the QSE, however ERCOT shall not issue an FFSS VDI without evidence of an impending or actual fuel supply disruption affecting the FFSSR.

(e) If the FFSSR is generating at a level above the FFSS MW awarded amount and that level of output cannot be sustained for the required duration of the FFSS award, ERCOT may use a manual High Dispatch Limit (HDL) override to ensure the FFSSR can continue to generate at the FFSS MW award level for the entire FFSS duration requirement specified in the RFP.

(f) The FFSSR shall continuously deploy FFSS to generate electricity until the earlier of (i) the exhaustion of the fuel reserved to generate at the FFSS MW award level for the duration requirement specified in the RFP, including any fuel that was restocked following approval or instruction from ERCOT, (ii) the fuel supply disruption no longer exists, or (iii) ERCOT determines the FFSS deployment is no longer needed. Upon satisfying one of these qualifications, ERCOT shall terminate the VDI. In the event of (i), the FFSSR shall not be obligated to continue being available for FFSS deployment for the remainder of the Watch. In the event of (ii) or (iii), the FFSSR shall continue being available for FFSS deployment for the remainder of the Watch.

(g) The QSE for the FFSSR is responsible for communicating with the ERCOT control room the anticipated exhaustion of the reserved fuel at least six hours before that anticipated exhaustion and upon the exhaustion of that fuel.

(h) A QSE shall notify the ERCOT control room of the anticipated exhaustion of emissions credits or permit allowances at least six hours before the exhaustion of those credits or allowances. Upon receiving such notification, ERCOT shall modify the VDI so the FFSS deployment is terminated upon exhaustion of those credits or allowances.

(i) Upon deployment or recall of FFSS, ERCOT shall notify all Market Participants that such deployment or recall has been made, including the MW capacity of service deployed or recalled.

(5) Following each deployment of FFSS, the QSE for an FFSSR may request approval from ERCOT via email to [FFSS@ercot.com](mailto:FFSS@ercot.com), or ERCOT may instruct the QSE to restock their fuel reserve to restore their ability to generate at the FFSS MW award level for the duration requirement specified in the RFP as follows:

(a) The QSE requests preliminary approval from ERCOT control room, or ERCOT provides preliminary instruction, to restock and provide ERCOT an initial estimated timeline to complete the refueling.

(b) After receiving preliminary approval or instruction from ERCOT, the QSE shall:

(i) Immediately provide a final estimate for completing the restocking of fuel; or

(ii) Within 24 hours, notify the ERCOT control room with an updated estimated timeline to complete the restocking of the fuel.

(c) Based on the most recent expected time needed to restock the fuel, the ERCOT control room may or may not provide final approval for restocking of the fuel.

(d) If ERCOT makes final approval to restock the fuel, the QSE representing the FFSSR shall inform the ERCOT control room immediately when restocking is complete.

(6) Following final approval from ERCOT, a QSE must restock their fuel reserve, using existing fuel inventories or new fuel purchases, to restore their ability to generate at the FFSS MW award level for the specified duration requirement. In the event ERCOT does not receive the request to restock from a QSE representing an FFSSR, but the QSE no longer has sufficient reserved fuel to generate at the FFSS MW award level for the specified duration requirement, the QSE shall communicate to the ERCOT control room this reduced capability and ERCOT may instruct the QSE to restock the fuel reserve as described in paragraph (5) above.

(7) For a Resource to be considered as an alternate for providing FFSS, the following requirements must be met. The alternate Resource must:

(a) Be able to provide net real power sufficient to generate at the same FFSS MW award level as the primary Resource for the duration requirement specified in the RFP;

(b) Be a single Generation Resource, as registered with ERCOT; and

(c) Use the same source of fuel reserve for providing FFSS as the primary Resource.

(8) An FFSS Offer Submission Form may have up to three alternate Generation Resources per primary Resource offering to provide FFSS.

(9) A Generation Resource may only be offered as an alternate Resource for one primary Resource for the FFSS obligation period.

(10) For FFSSRs with approved alternate Generation Resources if the FFSSR becomes unavailable, the QSE must:

(a) As soon as practicable, call the ERCOT control room to inform an operator that the FFSSR will be replaced by one of the alternate Generation Resources, specify which alternate Generation Resource (if multiple alternate Generation Resources have been designated), and provide an estimate of how long the replacement will be in effect;

(b) Update the Availability Plans for these Generation Resources to reflect current operating conditions within 60 minutes after identifying the change in availability of the FFSSR; and

(c) Update the COPs for these Generation Resources within 60 minutes after identifying the change in availability of the FFSSR.

(11) For FFSSRs that were replaced by one of their approved alternate Generation Resources, when the primary Resource is once again the FFSSR, the QSE must call the ERCOT control room and inform an operator of the change as soon as practicable.

(12) For the purpose of the Firm Fuel Supply Service Standby Fee as described in Section 6.6.14.2, Firm Fuel Supply Service Hourly Standby Fee Payment and Fuel Replacement Cost Recovery, the FFSS Hourly Rolling Equivalent Availability Factor shall be determined by using the availability for the primary or any approved alternate Generation Resource providing FFSS, as appropriate for the FFSS obligation period specified in the RFP.

(13) An FFSSR providing BSS must have sufficient fuel reserved to generate at the FFSS MW award level for the duration requirement specified in the RFP in addition to any fuel required for the Generation Resource to meet the contracted BSS obligation. Any remaining fuel reserve in addition to that required for meeting FFSS and BSS obligations can be used at the QSE’s discretion.

(14) If ERCOT issues an FFSS VDI to an FFSSR for the same Operating Hour where a RUC instruction was issued, then for Settlement purposes ERCOT will consider the RUC instruction as cancelled.

(15) If FFSS is deployed, then ERCOT will provide a report to the TAC or its designated subcommittee within 45 days of the end of the FFSS obligation period. The report must include the Resources deployed and the reason for any deployments.

(16) Any QSE that submits an offer or receives an award for a SWGR to provide FFSS, and the Resource Entity that owns or controls that SWGR, shall:

(a) Not nominate the SWGR to satisfy supply adequacy or capacity planning requirements in any Control Area other than the ERCOT Region during the period of the FFSS obligation; and

(b) Take any further action requested by ERCOT to ensure that ERCOT will be classified as the “Primary Party” for the SWGR under any agreement between ERCOT and another CAO during the period of the FFSS obligation.

(17) On an annual basis after the FFSS season, ERCOT will provide a report separately for the total amounts from Section 6.6.14.1, Firm Fuel Supply Service Fuel Replacement Costs Recovery, and Section 6.6.14.2, to the TAC or its designated subcommittee.