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| **Date:** | June 16, 2025 |
| **To:** | Board of Directors |
| **From:** | Caitlin Smith, Technical Advisory Committee (TAC) Chair |
| **Subject:** | Unopposed Revision Requests Recommended by TAC for Approval |

## Issue for the ERCOT Board of Directors

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| **ERCOT Board of Directors Meeting Date:** June 23-24, 2025  **Item No.:** 7.1 |

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| **Issue:**Consideration of the following Revision Requests: Nodal Protocol Revision Request (NPRRs), Nodal Operating Guide Revision Requests (NOGRRs), Other Binding Document Revision Request (OBDRR), Planning Guide Revision Request (PGRR), and System Change Request (SCR) recommended for approval by TAC (with no opposing votes recorded):  * NPRR1226, Estimated Demand Response Data; * NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities; * NPRR1267, Large Load Interconnection Status Report; * NPRR1271, Revision to User Security Administrator and Digital Certificates Opt-out Eligibility; * NPRR1276, Move OBD to Section 22 – Emergency Response Service Procurement Methodology; * NOGRR265, Related to NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities; * NOGRR275, Eliminate Scheduling Center Requirements for QSEs That Are Not WAN Participants; * OBDRR054, TDSP(s) Pre-Production Verification Testing; * PGRR125, Update of LSIPA Compliance Attestation – URGENT; and * SCR830, Expose Limited API Endpoints Using Machine-to-Machine Authentication. |
| **Background/History:** **Unless otherwise noted: (i) all Market Segments participated in each vote; (ii) For NPRRs, ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed the NPRR and do not believe it requires changes to credit monitoring activity or the calculation of liability.**  **Board Review is required of all TAC Reports and Impact Analyses (Protocol Section 21.3.10)**   * [***NPRR1226,*** ***Estimated Demand Response Data***](https://www.ercot.com/mktrules/issues/NPRR1226)   **Sponsor:**  ERCOT Steel Mills  **Revision Description:** This NPRR directs ERCOT to prepare and publish estimated Demand response data showing aggregated State Estimated Load (SEL) load points selected by ERCOT. The selection of Loads to be aggregated for the report will be based on periodically updated off-line analysis of the frequency and magnitude of reductions observed in historical State Estimator load data that is associated with market signals such as Locational Marginal Prices (LMPs), high levels of summer month ERCOT load, ERCOT-wide appeal(s) through public voluntary energy appeal, or other ERCOT actions.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F05%2F05%2F1226NPRR-16-Impact-Analysis-050525.docx&wdOrigin=BROWSELINK)**:** Between $100K and $150K (5 – 7 months)  **Proposed Effective Date:** Upon system implementation – Priority 2026; Rank 4770  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F05%2F30%2F1226NPRR-20-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of NPRR1226 as recommended by PRS in the 5/14/25 PRS Report as revised by TAC.  **ERCOT Opinion:** ERCOT supports approval of NPRR1226.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1226 and believes the market impact for NPRR1226 provides a viable means for Market Participants to obtain a data sub-set of estimated Demand response activity.  **IMM Opinion:** IMM has no opinion on NPRR1226.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NPRR1226#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities***](https://www.ercot.com/mktrules/issues/NPRR1238)   **Sponsor:**  GSEC  **Revision Description:** This NPRR introduces a new category of Voluntary Early Curtailment Load (VECL) and establishes a process by which Loads may operate as a VECL so that they can be accounted for differently in Load shed tables than other Loads.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F13%2F1238NPRR-37-Revised-Impact-Analysis-061325.docx&wdOrigin=BROWSELINK)**:** Between $700K and $1.0M (10 – 14 months)  **Proposed Effective Date:** Upon system implementation – Priority 2026; Rank 4535  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F12%2F1238NPRR-36-TAC-Report-061225.docx&wdOrigin=BROWSELINK)**/Decision:** On 6/12/25, TAC voted unanimously to recommend approval of NPRR1238 as recommended by PRS in the 5/14/25 PRS Report as amended by the 6/5/25 TIEC comments; and the 5/27/25 Revised Impact Analysis.  **ERCOT Opinion:** ERCOT supports approval of NPRR1238.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1238 and believes that it provides improvements by introducing a new category of VECL and establishing a process by which Loads may operate as an VECL so that they can be accounted for differently in Load shed tables than other Loads.  **IMM Opinion:** IMM has no opinion on NPRR1238.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NPRR1238#keydocs) **(including comments, ballots, reports and impact analyses)**   * ***[NPRR1267, Large Load Interconnection Status Report](https://www.ercot.com/mktrules/issues/NPRR1267)***   **Sponsor:** Residential Consumer / Office of Public Utility Counsel (OPUC)  **Revision Description:** This NPRR requires the publication of a large load interconnection status report. It is intentionally not defining “Large Load” to leave that to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater. However, Customer information, including large load information, is owned by the Customer and is therefore confidential so the information on large loads must be aggregated.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F05%2F13%2F1267NPRR-10-Impact-Analysis-051325.docx&wdOrigin=BROWSELINK)**:** Between $100K and $150K (5 – 8 months)  **Proposed Effective Date:** Upon system implementation – Priority 2026; Rank 4760  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F05%2F30%2F1267NPRR-14-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of NPRR1267 as recommended by PRS in the 5/14/25 PRS Report.  **ERCOT Opinion:** ERCOT supports approval of NPRR1267.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1267 and believes the market impact for NPRR1267, coupled with the implementation of NPRR1234 provides increased publicly available visibility into the characteristics of the growing large load interconnection queue.  **IMM Opinion:** IMM has no opinion on NPRR1267.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NPRR1267#keydocs) **(including comments, ballots, reports and impact analyses)**   * ***[NPRR1271, Revision to User Security Administrator and Digital Certificates Opt-out Eligibility](https://www.ercot.com/mktrules/issues/NPRR1271)***   **Sponsor:** ERCOT  **Revision Description:** This NPRR allows Comision Federal de Electricidad (CFE), which is registered with ERCOT as a Transmission and/or Distribution Service Provider (TDSP), Load Serving Entity (LSE), and Resource Entity, to opt out of the requirement to designate a User Security Administrator (USA) and receive Digital Certificates.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F01%2F28%2F1271NPRR-02%2520Impact%2520Analysis%2520012825.docx&wdOrigin=BROWSELINK)**:** No impact  **Proposed Effective Date:** The first of the month following PUCT approval  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F04%2F25%2F1271NPRR-12-TAC-Report-042325.docx&wdOrigin=BROWSELINK)**/Decision:** On 4/23/25, TAC voted unanimously to recommend approval of NPRR1271 as recommended by PRS in the 4/9/25 PRS Report.  **ERCOT Opinion:** ERCOT supports approval of NPRR1271.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1271 and believes that it provides process improvements by allowing CFE to opt out of the requirement to designate a USA and receive Digital Certificates.  **IMM Opinion:** IMM has no opinion on NPRR1271.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NPRR1271#keydocs) **(including comments, ballots, reports and impact analyses)**   * ***[NPRR1276, Move OBD to Section 22 – Emergency Response Service Procurement Methodology](https://www.ercot.com/mktrules/issues/NPRR1276)***   **Sponsor:** ERCOT  **Revision Description:** This NPRR incorporates the Other Binding Document “Emergency Response Service Procurement Methodology” into the Protocols to standardize the approval process.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F03%2F10%2F1276NPRR-02-Impact-Analysis-031025.docx&wdOrigin=BROWSELINK)**:** Less than $5K  **Proposed Effective Date:** Upon system implementation  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F02%2F1276NPRR-08-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of NPRR1276 as recommended by PRS in the 5/14/25 PRS Report.  **ERCOT Opinion:** ERCOT supports approval of NPRR1276.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NPRR1276 and believes it has a positive market impact by standardizing the approval process for binding language.  **IMM Opinion:** IMM has no opinion on NPRR1276.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NPRR1276#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***NOGRR265, Related to NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities***](https://www.ercot.com/mktrules/issues/NOGRR265)   **Sponsor:** ERCOT  **Revision Description:** This NOGRR establishes a process by which Loads may operate as a VECL so that they can be accounted for differently in Load shed tables than other Loads.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F13%2F265NOGRR-25-Revised-Impact-Analysis-061325.docx&wdOrigin=BROWSELINK)**:** No impact (There are no additional impacts to this NOGRR beyond what was captured in the Impact Analysis for NPRR1238.)  **Proposed Effective Date:** Upon system implementation of NPRR1238  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F12%2F265NOGRR-24-TAC-Report-061225.docx&wdOrigin=BROWSELINK)**/Decision:** On 6/12/25, TAC voted unanimously to recommend approval of NOGRR265 as recommended by ROS in the 5/20/25 ROS Report as amended by the 6/5/25 TIEC comments.  **ERCOT Opinion:** ERCOT supports approval of NOGRR265.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NOGRR265 and believes that it provides improvements by introducing a new category of VECL and establishing a process by which Loads may operate as an VECL so that they can be accounted for differently in Load shed tables than other Loads.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NOGRR265#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***NOGRR275, Eliminate Scheduling Center Requirements for QSEs That Are Not WAN Participants***](https://www.ercot.com/mktrules/issues/NOGRR275)   **Sponsor:** ERCOT  **Revision Description:**  This NOGRR aligns the Nodal Operating Guide with changes in the Protocols to eliminate scheduling center requirements for Qualified Scheduling Entities (QSEs) that are not Wide Area Network (WAN) Participants.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F02%2F28%2F275NOGRR-02-Impact-Analysis-022825.docx&wdOrigin=BROWSELINK)**:** No impact  **Proposed Effective Date:** The first of the month following Public Utility Commission of Texas (PUCT) approval  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F02%2F275NOGRR-08-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of NOGRR275 as recommended by ROS in the 5/1/25 ROS Report.  **ERCOT Opinion:** ERCOT supports approval of NOGRR275.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed NOGRR275 and believes that it provides process improvements by aligning the Nodal Operating Guide with the Protocols to eliminate scheduling center requirements for QSEs that are not WAN Participants.  **IMM Opinion:** IMM has no opinion on NOGRR275.  [**Key Documents**](https://www.ercot.com/mktrules/issues/NOGRR275#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***OBDRR054, TDSP(s) Pre-Production Verification Testing***](https://www.ercot.com/mktrules/issues/OBDRR054)   **Sponsor:**  CenterPoint Energy  **Revision Description:** This OBDRR creates a process by which Market Participants will be required by the Transmission and/or Distribution Service Provider (TDSP) to successfully test retail transactions prior to their Data Universal Numbering System (DUNS) being activated in a TDSP’s production system.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F04%2F16%2F054OBDRR-04-Impact-Analysis-041625.docx&wdOrigin=BROWSELINK)**:** No impact  **Proposed Effective Date:** The first of the month following PUCT approval  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F02%2F054OBDRR-08-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of OBDRR054 as recommended by RMS in the 5/13/25 RMS Report.  **ERCOT Opinion:** ERCOT supports approval of OBDRR054.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed OBDRR054 and believes that it provides improvements by creating a process in which Market Participants will be required by the TDSP to successfully test retail transactions prior to their DUNS being activated in a TDSP’s production system.  **IMM Opinion:** IMM has no opinion on OBDRR054.  [**Key Documents**](https://www.ercot.com/mktrules/issues/OBDRR054#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***PGRR125, Update of LSIPA Compliance Attestation - URGENT***](https://www.ercot.com/mktrules/issues/PGRR125)   **Sponsor:** Constellation Energy Generation, Tenaska Power Services, NRG Texas Power LLC, Lower Colorado Review Authority (Joint Sponsors)  **Revision Description:** This PGRR makes the Lone Star Infrastructure Protection Act (LSIPA) attestation in the Planning Guide consistent with the language in Protocol Section 23, Form Q, Attestation Regarding Market Participant Citizenship, Ownership, or Headquarters. Specifically, it adds language that would permit an Interconnecting Entity (IE) or property owner to demonstrate compliance under LSIPA even if it has a subsidiary or Affiliate that falls under any of the citizenship or headquarter criteria of LSIPA, so long as the subsidiary does not have direct or remote access to or control of the project, the real property utilized by the project, the Resource Integration and Ongoing Operations (RIOO) system, the Market Information System (MIS), other ERCOT systems, or any confidential data from such systems.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F03%2F25%2F125PGRR-02-Impact-Analysis-032525.docx&wdOrigin=BROWSELINK)**:** No impact  **Proposed Effective Date:** The first of the month following PUCT approval  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F06%2F02%2F125PGRR-08-TAC-Report-052825.docx&wdOrigin=BROWSELINK)**/Decision:** On 5/28/25, TAC voted unanimously to recommend approval of PGRR125 as recommended by ROS in the 5/1/25 ROS Report as revised by TAC.  **ERCOT Opinion:** ERCOT supports approval of PGRR125.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed PGRR125 and believes that permitting an IE or property owner to demonstrate compliance under LSIPA under certain conditions even if it has a subsidiary or Affiliate that falls under any of the citizenship or headquarter criteria of LSIPA, will have a positive market impact by avoiding further delay of the development of new generation within ERCOT.  **IMM Opinion:** IMM has no opinion on PGRR125.  [**Key Documents**](https://www.ercot.com/mktrules/issues/PGRR125#keydocs) **(including comments, ballots, reports and impact analyses)**   * [***SCR830, Expose Limited API Endpoints Using Machine-to-Machine Authentication***](https://www.ercot.com/mktrules/issues/SCR830)   **Sponsor:**  AEP  **Revision Description:** This SCR implements a machine-to-machine (“M2M”) client credentials authentication flow using OAuth 2.0 to allow for certain read-only endpoints of the GINR Rest Application Programming Interface (API) to be exposed for authorized use.  [**Impact Analysis**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F04%2F08%2F830SCR-08-Impact-Analysis-040825.docx&wdOrigin=BROWSELINK)**:** Between $100K and $200K (6 - 9 months)  **Proposed Effective Date:** Upon system implementation – Priority 2026; Rank 4750  [**TAC Report**](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.ercot.com%2Ffiles%2Fdocs%2F2025%2F04%2F25%2F830SCR-12-TAC-Report-042325.docx&wdOrigin=BROWSELINK)**/Decision:** On 4/23/25, TAC voted unanimously to recommend approval of SCR830 as recommended by PRS in the 4/9/25 PRS Report.  **ERCOT Opinion:** ERCOT supports approval of SCR830.  **ERCOT Market Impact Statement:** ERCOT Staff has reviewed SCR830 and believes it has a positive market impact as it improves data quality by reducing the number of data errors and discrepancies between Market Participant-internal work management system and the RIOO system.  **IMM Opinion:** IMM has no opinion on SCR830.  [**Key Documents**](https://www.ercot.com/mktrules/issues/SCR830#keydocs) **(including comments, ballots, reports and impact analyses)**  The TAC Reports and Impact Analyses for these Revision Requests are included in the [ERCOT Board meeting materials](https://www.ercot.com/calendar/06232025-Board-of-Directors-Meeting).  In addition, these Revision Requests and supporting materials are posted on the ERCOT website. |
| **Key Factors Influencing Issue:** The PRS met, discussed the issues, and submitted reports to TAC regarding NPRRs 1226, 1238, 1267, 1271, 1276; and SCR830.  The ROS met, discussed the issues, and submitted reports to TAC regarding NOGRRs 265, 275; and PGRR125.  The RMS met, discussed the issues, and submitted a report to TAC regarding OBDRR054. |
| **Conclusion/Recommendation:** As more specifically described above, TAC recommends that the Board recommend approval of NPRRs 1226, 1238, 1267, 1271 and 1276; NOGRRs 265 and 275; OBDRR054; PGRR125; and SCR830. |

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.**

**BOARD OF DIRECTORS RESOLUTION**

##### WHEREAS, after due consideration of the alternatives, the Board of Directors (Board) of Electric Reliability Council of Texas, Inc. (ERCOT) deems it desirable and in the best interest of ERCOT to recommend approval of the following Nodal Protocol Revision Request (NPRRs), Nodal Operating Guide Revision Requests (NOGRRs), Other Binding Document Revision Request (OBDRR), Planning Guide Revision Request (PGRR), and System Change Request (SCR) recommended for approval by TAC (with no opposing votes recorded):

* NPRR1226, Estimated Demand Response Data;
* NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities;
* NPRR1267, Large Load Interconnection Status Report;
* NPRR1271, Revision to User Security Administrator and Digital Certificates Opt-out Eligibility;
* NPRR1276, Move OBD to Section 22 – Emergency Response Service Procurement Methodology;
* NOGRR265, Related to NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities;
* NOGRR275, Eliminate Scheduling Center Requirements for QSEs That Are Not WAN Participants;
* OBDRR054, TDSP(s) Pre-Production Verification Testing;
* PGRR125, Update of LSIPA Compliance Attestation – URGENT; and
* SCR830, Expose Limited API Endpoints Using Machine-to-Machine Authentication.

THEREFORE, BE IT RESOLVED, that the Board hereby recommends approval of NPRRs 1226, 1238, 1267, 1271 and 1276; NOGRRs 265 and 275; OBDRR054; PGRR125; and SCR830.

**CORPORATE SECRETARY’S CERTIFICATE**

I, Brandon Gleason, Assistant Corporate Secretary of ERCOT, do hereby certify that, at its June 23-24, 2025, meeting, the Board passed a motion approving the above Resolution by \_\_\_\_\_\_.

IN WITNESS WHEREOF, I have hereunto set my hand this \_\_\_ day of June 2025.

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Brandon Gleason

Assistant Corporate Secretary