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| SCR Number | [831](https://www.ercot.com/mktrules/issues/SCR831) | SCR Title | Short Circuit Model Integration |

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| Date | July 30, 2025 |

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| Submitter’s Information | |
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| Market Segment | Investor-Owned Utility (IOU) |

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| Comments |

Oncor, CenterPoint Energy Houston Electric (CEHE), American Electric Power (AEP) and Texas New Mexico Power (TNMP) (“Joint Transmission Service Providers (TSPs)”) provide these comments to System Change Request (SCR) 831, Short Circuit Model Integration, to acknowledge its potential benefits. Joint TSPs recognize that the successful implementation of this system change will depend on satisfactorily addressing several technical challenges and questions, including a large-scale data migration effort. While this implementation is likely to entail considerable effort on ERCOT’s part, Joint TSPs recommend that the SCR be implemented within three years of Public Utility Commission of Texas (PUCT) approval.

Joint TSPs emphasize that support for the SCR’s approval should not constitute a commitment to provide or maintain data related to this initiative until the implementation details have been proposed in writing by ERCOT for TSP review and comment, and TSPs are fully satisfied with these implementation details. Once a vendor-developed concept product is available, Joint TSPs recommend that a Nodal Operating Guide Revision Request (NOGRR) be submitted either by ERCOT or by a TSP to specifically describe the data elements that TSPs will need to provide for successful implementation of the SCR, so that that these items can be properly codified in Section 5, Network Operations Modeling Requirements, of the Nodal Operating Guide.

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| Revised Cover Page Language |

None

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| Proposed System Change |

None