

PROJECT NO. 54248

SELECTION OF THE RELIABILITY	§	PUBLIC UTILITY COMMISSION
MONITOR FOR THE ERCOT	§	OF TEXAS
POWER REGION	§	

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S
2025 SECOND QUARTER ACTIVITY REPORT**

Pursuant to the order of the Public Utility Commission of Texas (PUC/Commission) Directing ERCOT to Serve as Reliability Monitor, effective November 3, 2022, Electric Reliability Council of Texas, Inc. (ERCOT) Reliability Monitor (ERM) hereby submits its 2025 Second Quarter Activity Report.

I. BACKGROUND

On November 3, 2022, the Commission issued an order directing ERCOT to assume the duties and responsibilities of the reliability monitor for the ERCOT power region in accordance with 16 Tex. Admin. Code § 25.503(j).

As more particularly detailed in the Scope of Work filed in this Project on January 2, 2023, in its ERM function, ERCOT monitors, investigates, audits, and reports to the PUC on matters related to the compliance of ERCOT, Inc. and ERCOT Market Participants with reliability-related provisions of the Public Utility Regulatory Act (PURA), the PUC's Substantive Rules, and ERCOT Protocols and Other Binding Documents. The ERM also provides subject matter advice, expertise, and assistance with the PUC's reliability-related compliance and enforcement activities.

The PUC order directing ERCOT to assume the duties and responsibilities of the ERM directs ERCOT to file a quarterly report summarizing its previous quarter ERM activities.

II. 2025 SECOND QUARTER ACTIVITY REPORT

A. EXECUTIVE SUMMARY

During Q2, the ERM opened 27 new Incident Reviews:

Priority ¹	No. of Cases
Critical	6
High	2
Medium	13
Low	6
Total	27

The ERM referred the following Incident Reviews to the Commission's Division of Compliance and Enforcement (DICE) during Q2 documenting potential violations of Reliability Requirements:

- Four Critical Priority items involving voltage ride-through failures;
- Two Critical Priority items involving Firm Fuel Supply Service (FFSS); and
- One High Priority item involving failure to timely submit model data.

B. CHANGES TO RELIABILITY REQUIREMENTS TO PROMOTE IMPROVED RELIABILITY

The ERM is tracking the following revision requests that could impact ERCOT System reliability:

[NPRR1276](#) – Move Other Binding Document (OBD) to Section 22 – Emergency Response Service Procurement Methodology

[NPRR1278](#) – Establishing Advanced Grid Support Service as an Ancillary Service

[NPRR1280](#) – Establish Process for Permanent Bypass of Series Capacitor

[NPRR1281](#) – Improvements to Alternate Firm Fuel Supply Service Resource Designation

[NPRR1282](#) – Ancillary Service Duration under Real-Time Co-Optimization

[NPRR1283](#) – Modification of Subsynchronous Resonance Mitigation Timeline

[NPRR1284](#) – Guaranteed Reliability Load Process

[NPRR1285](#) – Improve Self-Commitment within Reliability Unit Commitment (RUC) Opt Out Window

¹ The ERM staff assess an event's impact on ERCOT System reliability and categorize events such as the loss of generation, frequency, or voltage excursions, *etc.* as "Critical." The ERM categorizes other events as "High," "Medium," or "Low" depending on such factors as: number and size of the facilities involved, if the event is local versus widespread, whether an issue relates to only an administrative matter, *etc.*

- [NPRR1286](#) – Establish Multi-Value Criteria for Resiliency-Related Transmission Project Evaluation
- [NPRR1287](#) – Revisions to Outage Coordination
- [NPRR1290](#) – Gap Resolutions and Clarifications for the Implementation of Real-Time Co-optimization plus Batteries
- [NOGRR277](#) – Related to NPRR1282, Ancillary Service Duration under Real-Time Co-Optimization
- [PGRR122](#) – Reliability Performance Criteria for Loss of Load
- [PGRR124](#) – ESR Maintenance Exception to Modifications
- [PGRR125](#) – Update to Loan Star Infrastructure Protection Act Compliance Attestation
- [PGRR126](#) – Related to NPRR1284, Guaranteed Reliability Load Process
- [PGRR127](#) – Addition of Proposed Generation to the Planning Models
- [PGRR128](#) – Regional Transmission Plan Review of Grid Enhancing Technologies

In addition to the foregoing, the ERM continues working with Subject Matter Experts on the following issues to improve ERCOT System reliability:

- Voltage ride-through and support;
- Operational issues with IRR Resources when curtailed;
- Telemetry accuracy;
- Model data accuracy and timeline.

C. ROUTINE COMPLIANCE MONITORING

In addition to investigating individual potential violations, the ERM performed routine monitoring activities of Market Participant and ERCOT compliance with Reliability Requirements. Specifically, ERM analysts monitor compliance with the following Reliability Requirements² each month:

- Resource Ancillary Service Qualification Compliance – § 8.1.1.1(1)
- Quick Start Resource Performance – § 8.1.1.2(17)(a)
- QSE Ancillary Service Capacity Compliance – § 8.1.1.3(3)

² References are to Protocols unless otherwise noted.

- Generation Resource Energy Deployment Performance (GREDP) for Non-Intermittent Renewable Resources – § 8.1.1.4.1(7)
- GREDP for Intermittent Renewable Resources (IRRs) – § 8.1.1.4.1(8)
- Controllable Load Resource (CLR) Energy Deployment Performance – § 8.1.1.4.1(9)
- Energy Storage Resource Energy Deployment Performance – § 8.1.1.4.1(9)
- Responsive Reserve Service (RRS) Deployment Performance – § 8.1.1.4.2
 - RRS from Generation Resources and Controllable Load Resources (CLRs) – § 8.1.1.4.2(1)(a)
 - Resources with Insufficient Frequency Responsive Capacity – § 8.1.1.4.2(1)(b)
- RRS from Non-Controllable Load Resources (NCLRs) – § 8.1.1.4.2(1)(a), (4), (6)
 - Non-Spin Reserve Service (NSRS) Deployment Performance – § 8.1.1.4.3
 - NSRS from Generation Resources – § 8.1.1.4.3(3)(a) & (b)
 - NSRS from CLRs – § 8.1.1.4.3(3)(a), (d)
 - NSRS from NCLRs – § 8.1.1.4.3(3)(e), (4)
- ERCOT Contingency Reserve Service (ECRS) Deployment Performance – § 8.1.1.4.4
 - ECRS from Generation Resources and CLRs – § 8.1.1.4.4(1)(a)
 - ECRS from NCLRs – § 8.1.1.4.4(1)(a), (4), (6)
- ERS Performance – § 8.1.3
 - Testing – § 8.1.3.2(1)(a)(ii)
 - Availability – § 8.1.3.3.3(1)(a)
 - Event Performance – § 8.1.3.3.4
- PFR Performance – § 8.5.1.1(1), 8.5.2.1(1)
- 12-Month Rolling Average – Operating Guide § 2.2.8(1)
- COP Errors – § 3.9.1(3), 8.1.2(2)
- Distribution Service Provider Transmission Operator Representation – § 16.19(1)

For each category, ERM analysts download ERCOT data from the ERCOT Market Information System to validate failures before reviewing and comparing data, analyzing performance, and comparing performance data to performance metrics to determine incidents to

include in a quarterly report to DICE. The ERM initiates new Incident Reviews following these analyses.

D. OVERALL STATE OF ERCOT SYSTEM RELIABILITY

The overall state of ERCOT System reliability is good. The ERM continues to identify the following areas of concern based on discussions with ERCOT SMEs:

- Energy Storage Resource (ESR) performance/State-of-Charge monitoring
- High Sustained Limit (HSL) issues for Intermittent Renewable Resources when curtailed
- Voltage ride-through by Inverter-based Resources
- “ONHOLD” Resource Status usage

E. 2025 COMPLIANCE AUDITS

The ERM continues to work on two compliance audits. The first audit focuses on Market Participant compliance with Nodal Operating Guides requirements to submit back-up control plans for scheduling centers. The ERM issued a Market Notice regarding this audit on January 30, 2025 and sent Requests for Information (RFIs) to more than 380 Market Participants. By the end of Q1, the ERM had received all RFI responses. ERM staff reviewed the RFI responses, compiled them into a database and drafted a report currently being reviewed.

The second compliance audit focuses on ERCOT's performance in connection with Operating Guide § 2.2.4.3(2) related to Constant Frequency Control Testing. ERCOT has responded to the ERM's RFIs. ERM personnel are reviewing the responses and will draft a report.

The ERM stands ready to provide any additional information requested by the Commission.

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Respectfully submitted,

/s/ A. Andrew Gallo

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