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| NPRR Number | [1298](https://www.ercot.com/mktrules/issues/NPRR1298) | NPRR Title | Timing Requirements for Comments to Subcommittee Reports |
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| Date | September 10, 2025 |
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| Submitter’s Information |
| Name | Ann Boren |
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| Market Segment | Not applicable |

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| Comments |

ERCOT appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1298. While we sympathize with the time constraints for reviewing comments, we have concerns about codifying the discretion to disregard “late comments”.

We have several concerns with the proposed NPRR that we’ve discussed extensively:

* Rebuttal Comments and Their Timing: A main concern is the handling of rebuttal comments. If initial comments are posted a week in advance, rebuttal comments submitted less than a week before the meeting could be classified as late. This ambiguity could lead to inconsistencies in the submission and review process.
* Timing of Comment Submission and Posting: Stakeholders are expected to submit their comments to ERCOT a week before the scheduled meeting. However, ERCOT requires sufficient time to review these comments, and ERCOT cannot guarantee that we will be able to turn them around on the same day they are received. Despite the submission being a week in advance, the comments might not be posted a full week in advance, leading to their categorization as late submissions. According to the Protocols, ERCOT is technically allotted three Business Days to review and post comments. While we always strive to expedite this process, we are entitled to utilize the full three Business Days.
* Evaluation Process for Late Comments: There is a lack of clarity regarding the process behind evaluating late comments. It is essential to understand how the subcommittee chair will track all late comments and whether they will provide reasons for considering or not considering each set of late comments at the meeting. This transparency is crucial to ensure fairness and consistency in the decision-making process.
* Functional effectiveness: If a subcommittee chair decides not to consider late comments, members can still introduce similar changes through *desktop edits* during meetings. Thus, NPRR1298 can be bypassed, though it may require creating edits live, which is time-consuming.
* Applicability at Different Levels: It is important to note that this discretion for consideration of late comments is not being applied at the TAC level but only at the subcommittee level. This discrepancy could prompt stakeholders to file their comments directly with the TAC if they believe their comments might not be duly considered by the Subcommittee. This could lead to procedural complications and inefficiencies.

In conclusion, NPRR1298 raises concerns about fairness and consistency for all stakeholders. While timely submission and review of comments are important, subcommittees have always used their discretion to evaluate materials during meetings. They may table a Revision Request if more time is needed or recommend approval with amendments based on comments. ERCOT continues to support written comments to support stakeholder discussion. ERCOT requests NPRR1298 be tabled until these concerns can be addressed.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.