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| NPRR Number | [1298](https://www.ercot.com/mktrules/issues/NPRR1298) | NPRR Title | Timing Requirements for Comments to Subcommittee Reports |
| Date of Decision | September 17, 2025 |
| Action | Tabled |
| Timeline  | Normal |
| Proposed Effective Date | To be determined |
| Priority and Rank Assigned | To be determined |
| Nodal Protocol Sections Requiring Revision  | 21.4.4, Protocol Revision Subcommittee Review and Action21.4.5, Comments to the Protocol Revision Subcommittee Report |
| Related Documents Requiring Revision/Related Revision Requests | Commercial Operation Guide 4.3.3, WMS Review and Action4.3.4, Comments to the WMS ReportLoad Profiling Guide 2.3.3, RMS Review and Action2.3.4, Comments to the RMS ReportNodal Operating Guide 1.3.3.3, ROS Review and Action1.3.3.4, Comments to the ROS ReportPlanning Guide 1.2.3.3, ROS Review and Action1.2.3.4, Comments to the ROS ReportResource Registration Glossary 1.2.3.3, ROS Review and Action1.2.3.4, Comments to the ROS ReportRetail Market Guide 3.3.3, Retail Market Subcommittee Review and Action3.3.4, Comments to the Retail Market Subcommittee ReportSettlement Metering Operating Guide 10.3.3, Wholesale Market Subcommittee Review and Action10.3.4, Comments to the Wholesale Market Subcommittee ReportVerifiable Cost Manual 13.3.3, Wholesale Market Subcommittee Review and Action 13.3.4, Comments to the Wholesale Market Subcommittee Report |
| Revision Description | This Nodal Protocol Revision Request (NPRR) extends discretion to review comments to the PRS Report that are posted less than six days in advance of the "next regularly scheduled" PRS meeting. Paragraph (2) of Section 21.4.4, Protocol Revision Subcommittee Review and Action, allows PRS the discretion to not consider comments on a new NPRR if they are posted after the 14-day comment period.  |
| 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 | This NPRR would help Market Participants make more informed decisions on NPRRs by having timely comments. It provides Subcommittee chairs with the discretion to consider late filed comments.  |
| PRS Decision | On 9/17/25, PRS voted unanimously to table NPRR1298. All Market Segments participated in the vote. |
| Summary of PRS Discussion | On 9/17/25, the sponsor provided an overview of NPRR1298. Participants reviewed the 9/10/25 ERCOT comments, discussed the reasons for the development of NPRR1298, and expressed support for the effort to address an on-going issue. Some participants expressed concern for unproductive meetings due to late-submitted materials and comments and supported incentivizing timely submission. Other participants noted that voting bodies already have discretion to consider materials or not and expressed concern for unintended consequences. Participants requested additional time to consider the language. |

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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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| Sponsor |
| Name | Katie Rich |
| E-mail Address | Katie.rich@vistracorp.com |
| Company | Vistra Corporate Service Company LLC |
| Phone Number |  |
| Cell Number | 737-313-9351 |
| Market Segment | Independent Generator |

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| **Market Rules Staff Contact** |
| **Name** | Brittney Albracht |
| **E-Mail Address** | Brittney.Albracht@ercot.com  |
| **Phone Number** | 512-225-7027 |

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| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| ERCOT 091025 | Enumerated concerns for fairness and consistency for stakeholders to exercise their discretion to evaluate materials during meetings. |

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| Market Rules Notes |

None

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| Proposed Protocol Language Revision |

21.4.4 Protocol Revision Subcommittee Review and Action

(1) Any ERCOT Member, Market Participant, the Public Utility Commission of Texas (PUCT) Staff, the Reliability Monitor, the North American Electric Reliability Corporation (NERC) Regional Entity, the Independent Market Monitor (IMM), or ERCOT may comment on a Revision Request.

(2) To receive consideration, comments must be delivered electronically to ERCOT in the designated format provided on the ERCOT website within 14 days from the posting date of the Revision Request. Comments posted after the 14-day comment period may be considered at the discretion of the PRS chair. Comments submitted in accordance with the instructions on the ERCOT website—regardless of date of submission—shall be posted to the ERCOT website and distributed to the PRS within three Business Days of submittal.

(3) The PRS shall consider the Revision Request at its next regularly scheduled meeting after the end of the 14-day comment period. At such meeting, the PRS may take action on the Revision Request. The quorum and voting requirements for PRS action are set forth in the Technical Advisory Committee Procedures. In considering action on a Revision Request, PRS may:

(a) Recommend approval of the Revision Request as submitted or as modified;

(b) Reject the Revision Request;

(c) Table the Revision Request; or

(d) Refer the Revision Request to another TAC subcommittee, working group, or task force as provided in Section 21.3, Protocol Revision Subcommittee.

(4) If a motion is made to recommend approval of a Revision Request and that motion fails, the Revision Request shall be deemed rejected by PRS unless at the same meeting PRS later votes to recommend approval of, table, or refer the Revision Request. If a motion to recommend approval of a Revision Request fails via e-mail vote according to the Electric Reliability Council of Texas Technical Advisory Committee Procedures, the Revision Request shall be deemed rejected by PRS unless at the next regularly scheduled PRS meeting or in a subsequent e-mail vote prior to such meeting, PRS votes to recommend approval of, table, or refer the Revision Request. The rejected Revision Request shall be subject to appeal pursuant to Section 21.4.12.1, Appeal of Protocol Revision Subcommittee Action.

(5) Within three Business Days after PRS takes action, ERCOT shall post a PRS Report reflecting the PRS action on the ERCOT website. The PRS Report shall contain the following items:

(a) Identification of submitter of the Revision Request;

(b) Protocol language or summary of requested changes to ERCOT systems, recommended by the PRS, if applicable;

(c) Identification of authorship of comments;

(d) Proposed effective date(s) of the Revision Request;

(e) Priority and rank for any Revision Requests requiring an ERCOT project for implementation; and

(f) PRS action.

(6) The PRS chair shall notify TAC of Revision Requests rejected by PRS.

21.4.5 Comments to the Protocol Revision Subcommittee Report

(1) Any ERCOT Member, Market Participant, PUCT Staff, the Reliability Monitor, the NERC Regional Entity, the IMM, or ERCOT may comment on the PRS Report. Comments submitted in accordance with the instructions on the ERCOT website—regardless of date of submission—shall be posted on the ERCOT website and distributed to the committee(s) (i.e., PRS and/or TAC) considering the Revision Request within three Business Days of submittal.

(2) At PRS, comments to the PRS Report posted at least six days in advance of the meeting will be considered. Comments to the PRS Report posted fewer than six days in advance of the meeting may be considered at the discretion of the PRS chair.

(3) At TAC, comments to the PRS report will be considered.