|  |  |  |  |
| --- | --- | --- | --- |
| NPRR Number | [1303](https://www.ercot.com/mktrules/issues/NPRR1303#summary) | NPRR Title | Modernize Submission of Declarations of Natural Gas Pipeline Coordination |
|  |  |
| Date | October 7, 2025 |
|  |  |
| Submitter’s Information |
| Name | Sheri Messer |
| E-mail Address | Sheri.messer@ercot.com  |
| Company | ERCOT |
| Phone Number | 512-695-5558 |
| Cell Number | 512-695-5558 |
| Market Segment | Not applicable |

|  |
| --- |
| Comments |

ERCOT submits these comments to Nodal Protocol Revision Request (NPRR) 1303 to align with NPRR1302, Addition of a Market Participant Service Portal within the MIS Certified Area and Revision of Forms. Both NPRRs, in part, seek to formally move submission of certain forms to the Market Participant Service Portal, but use inconsistent language. Therefore, these comments are proposed to resolve these inconsistencies.

|  |
| --- |
| Revised Cover Page Language |

None

|  |
| --- |
| Revised Proposed Protocol Language |

3.21 Submission of Declarations of Natural Gas Pipeline Coordination

(1) As part of its submission to ERCOT in connection with subsection (c)(3)(B) of P.U.C. Subst. R. 25.55, Weather Emergency Preparedness, each Resource Entity representing one or more Generation Resources subject to P.U.C. Subst. R. 25.55 that uses natural gas as its primary fuel shall submit to ERCOT via the Market Information System (MIS) Certified Area the information contained in the declaration in Section 22, Attachment K, Declaration of Natural Gas Pipeline Coordination, stating that the Resource Entity or its Qualified Scheduling Entity (QSE) made a documented effort to communicate with the operator of each natural gas pipeline directly connected to its Generation Resource to coordinate regarding potential impacts to the Generation Resource’s availability during the summer Peak Load Season of that year.

(2) If a Resource Entity or its QSE knows an activity or condition related to a natural gas pipeline directly connected to its Generation Resource will cause the Generation Resource’s unavailability, in whole or in part, the QSE shall, as soon as practicable, report that Outage or derate in the ERCOT Outage Scheduler in accordance with Section 3.1, Outage Coordination. An Outage or derate reported in the ERCOT Outage Scheduler need not be disclosed in the declaration contained in Section 22, Attachment K, nor reported under paragraph (4) below.

(3) If, before a Resource Entity submits the declaration contained in Section 22, Attachment K, the Resource Entity or its QSE is notified by an operator of a natural gas pipeline directly connected to its Generation Resource of an activity or condition (e.g. maintenance, inspection, malfunction, or third-party damage) that may limit or impede normal deliveries but is uncertain whether the activity or condition during the upcoming summer Peak Load Season will cause the Generation Resource to take an Outage or derate, the Resource Entity shall disclose the natural gas pipeline activity or condition in the declaration contained in Section 22, Attachment K, if the activity or condition materially increases the risk of Generation Resource unavailability during the summer Peak Load Season. The Resource Entity shall use its reasonable judgment to determine whether there is a material increase in the risk of unavailability.

(4) If, after submitting the declaration contained in Section 22, Attachment K, any previously disclosed information changes or a Resource Entity or its QSE receives new information about an activity or condition that may limit or impede normal natural gas deliveries and materially increases the risk of Generation Resource unavailability during the summer Peak Load Season, the Resource Entity shall disclose that information to ERCOT as soon as practicable. The Resource Entity shall use reasonable judgment to determine the risk of unavailability. When notifying ERCOT as required under this paragraph, the Resource Entity shall update the information required by paragraphs (3)(a)-(e) of the Natural Gas Pipeline Coordination section of Section 22, Attachment K, for the affected Generation Resource by sending an email to fuelsupply@ercot.com.

(5) In complying with its obligations in this Section 3.21, a Resource Entity or its QSE relies upon communications with and information received from operators of natural gas pipelines directly connected to the Resource Entity’s Generation Resource. The Resource Entity or its QSE shall act in good faith to request the required information and, as soon as practicable, share with each other any information received from a natural gas pipeline operator required to be disclosed to ERCOT under Section 3.21. The Resource Entity or its QSE need not warrant the accuracy or completeness of information received from the natural gas pipeline operator and subsequently disclosed to ERCOT.

**ERCOT Nodal Protocols**

**Section 22**

**Attachment K: Declaration of Natural Gas Pipeline Coordination**

**TBD**

**Declaration of Natural Gas Pipeline Coordination**

|  |
| --- |
|  |

**This form is illustrative of the fields that must be completed in the Market Participant Service Portal via the Market Information System (MIS) Certified Area. This form may not be submitted to ERCOT outside of the Market Participant Service Portal unless instructed by ERCOT in writing.**

**Please refer to the ERCOT’s Identity and Access Management User Guide for information on accessing the Market Participant Service Portal.**

**This declaration applies to the following Generation Resources (list by Resource Site Code):**

**Natural Gas Pipeline Coordination**

***INSTRUCTIONS: Use this section for Generation Resources relying on natural gas as the primary fuel source. Repeat the following for each applicable Generation Resource.***

Generation Resource (provide Resource Site Code):

(1) Identify the natural gas pipelines directly connected to the Generation Resource and contact information (name, phone number, and email) for each natural gas pipeline operator:

(2) If a natural gas pipeline operator did not respond to the Resource Entity’s documented effort to coordinate, check the box below and identify the natural gas pipeline operator.

[ ]  No response was received from the following natural gas pipeline operator:

(3) If a natural gas pipeline operator responded to the Resource Entity’s documented effort to coordinate and disclose activities or conditions materially increasing the risk of Generation Resource unavailability in the summer Peak Load Season, please disclose the following information:

(a) The name or identifier of the natural gas pipeline:

(b) The operator of the natural gas pipeline:

(c) Impacts the activity or condition may have on the Generation Resource’s availability (e.g., could cause an Outage or derate):

(d) The time period during which the activity or condition is expected to occur, including expected duration:

(e) Other useful information:

(4) If contract language prohibits the Resource Entity from disclosing any of the information requested in 3(a)-(e) above and the natural gas pipeline operator refused the Resource Entity’s documented effort to obtain consent to disclose that information to ERCOT, check the box below and identify the natural gas pipeline operator.

[ ]  Contract language prohibits disclosure and the following natural gas pipeline operator(s) would not consent to information disclosure: