



PUBLIC

Item 5: High-Impact Policy Discussions in the Stakeholder Process

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Board of Directors
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- **Purpose**

Provide an update on key policy issues currently in the stakeholder process

- **For Information Only**

For Information Only - No action is requested; for discussion only

Key Takeaways

- The Commission has identified key priorities for the 2026-2027 Biennium.
- Efforts continue to prioritize the key initiatives, along with non-discretionary regulatory requirements, as we move forward with RTC+B implementation and stabilization.
- ERCOT continues to work on highlighting key revision requests to the Board earlier and provide visibility on the evolution of issues through the stakeholder process.

Key Commission Priorities for 2026-2027

- In the [order](#) approving ERCOT's Biennial Budget, the Public Utility Commission identified key priorities for 2026-2027.
- ERCOT will work with Commission Staff to develop and reach target performance measures for these key priorities, including quantifiable measures of success in achieving milestones.

Large Load Interconnection

- Improving processes and timelines for the interconnection of large loads in the ERCOT power region.

- **Key Takeaway**

ERCOT will identify revision requests related to the key Commission priorities and ensure they are implemented on a timely basis and within budget.



Key Commission Priorities for 2026-2027

These performance measures are intended to support ERCOT's upcoming continuing implementation of the 2026 reliability standard assessment per [16 TAC § 25.508](#):

Real-Time Co-optimization + Batteries (RTC+B)

- Implementation and stabilization of RTC+B, including any improvements needed for Ancillary Service Demand Curves (ASDCs)

Senate Bill (SB) 6 (89R)

- Implementation of SB 6 provisions relating to the planning for, interconnection and operation of, and costs related to providing service for certain electrical loads

Dispatchable Reliability Reserve Service (DRRS)

- Implementation of a new DRRS Ancillary Service as required by House Bill (HB) 1500 (88R)

Implementation of Ancillary Service Study Findings

- Address the findings and next steps from Commission's [2024 Ancillary Services Study](#) required by SB 3 (87R)



Real-Time Co-Optimization + Batteries (RTC+B)

RTC+B launches at midnight going into Operating Day December 5, 2025 with the cutover from existing systems to the RTC+B systems.

The size and scope of the RTC+B project has impacted ERCOT's ability to move both existing and new initiatives through the stakeholder process. ERCOT continues to work with stakeholders to prioritize RTC+B stabilization and enhancements along with additional key priority initiatives.



Implementation of RTC+B Revision Requests

- 34 Revision Requests previously approved effective upon go-live
- ERCOT has identified certain system changes to ensure compliance with newly effective Protocol requirements that may not be complete and continues to work expeditiously so that system functionality matches the new Protocols requirements,



Post- RTC+B Implementation Revisions and Stabilization

- ERCOT anticipates revision requests to conform Protocols to RTC+B as built.
- ERCOT has also identified language in the ERCOT Protocols and an Other Binding Document (OBD) that require updates.
- [NPRR1311](#), *Correction to Real-Time Reliability Deployment Price Adders for Ancillary Services under Load Shed for RTC+B*



Dispatchable Reliability Reserve Service (DRRS)

- ERCOT has withdrawn [NPRR1235](#), Dispatchable Reliability Reserve Service as a Stand-Alone Ancillary Service, and refined the design of DRRS to address feedback from the Commission, IMM, and stakeholders.
- ERCOT engaged [Aurora Energy Research](#) to assess resource adequacy needs and the impact of market design changes on both reliability and costs.
- ERCOT will host a [workshop](#) on December 17, 2025, to present Aurora's report and solicit feedback.

NPRR1309

Dispatchable Reliability Reserve Service Ancillary Service

Primary revision request to establish DRRS as an Ancillary Service that addresses supply and demand forecast uncertainty and reduces the volume of Reliability Unit Commitments (RUCs).

Intended to deliver all aspects of DRRS required by PURA § 39.159(d) as adopted by HB 1500 (88R).

- **Posted: November 20, 2025**
- **Next Step: PRS for language consideration**

NPRR1310

Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor

Revision request proposes an Energy Storage Resource (ESR) participation model in DRRS and a Release Factor concept that provides optionality for DRRS to also be used as a mechanism to support resource adequacy.

- **Posted: November 20, 2025**
- **Next Step: PRS for language consideration**

- **Key Takeaway**

ERCOT's goal is a TAC recommendation regarding NPRR1309 for consideration at the June 2026 Board.



Large Load Issues

Senate Bill (SB) 6

ERCOT is evaluating and prioritizing the implementation of SB 6 Large Load related provisions through participation in PUC rulemaking projects and development of ERCOT action items.

- **Review of Net-Metering Arrangements (PURA 39.169)**
 - ERCOT has received first two requests for net metering arrangements under interim process.
- **Large Load Forecasting Criteria and Interconnection Standards (PURA 37.0561)**
 - ERCOT must develop the necessary Protocols to ensure the 2026 Regional Transmission Plan (RTP) complies.
 - ERCOT expects to present a 2026 RTP compliance plan in January 2026.

NOGRR282

Large Electronic Load Ride-Through Requirements

Establishes frequency and voltage ride-through requirements to ensure Large Electronic Loads (LELs) do not present a reliability risk to the system by tripping when frequency and voltage excursions within a specified range occur.

ERCOT has solicited feedback regarding the proposed requirements through the Large Load Working Group (LLWG) and issued Request for Information (RFIs) to the Transmission Service Providers (TSPs) regarding LEL ride-through capabilities.

- *Posted: November 14, 2025*
- *Next Step: ROS for language consideration*

NPRR1308

Related to NOGRR282, Large Electronic Load Ride-Through Requirements

Revision request creates a sub definition under Large Loads to identify LELs as a large load where 50% or greater of the Demand at the site consists of power electronic based load, specifically computational load, such as data centers and cryptocurrency mining facilities.

- *Posted: November 14, 2025*
- *Next Step: PRS for language consideration*



Residential Demand Response (RDR)

Developing a Residential DR Program is a key ERCOT corporate priority for 2025 in line with Enterprise Objectives and Key Results (OKR) Objective 2.

- RDR represents a source of capacity that is not fully enabled today. There is an opportunity for ERCOT to collaborate with stakeholders to develop a program that can incent and grow RDR capacity as an additional resource that can help support system reliability.
- RDR development and future market design evaluation is not an 'either-or' proposition, the significant future growth forecasted for the Region warrants considering an 'all of the above' approach to meet ERCOT's reliability mandate.

ERCOT has hired a consultant to work with ERCOT in reviewing the customer participation and performance of existing DR programs to ensure compatibility, and identify and address any possible incongruities, inefficiencies, or program overlap. The review will also help summarize the interplay and coordination points between all of Texas' DR programs, including those administered by market participants. ERCOT expects this initial phase of work to be completed in January 2026.

NPRR1296

Residential Demand Response Program

Establishes a program to enable residential Customers with smart responsive appliances or devices to reduce the system Load during peak Net Load hours in exchange for an incentive payment.

The RDR Program would offer an incentive payment for Retail Electric Providers (REPs) and Non-Opt-in Entities (NOIEs) (via their QSEs) to develop programs to incent RDR with a focus on high seasonal net load hours.

- ***Posted August 26, 2025***
- ***Current Status: tabled at PRS, referred to WMS and RMS***

WMS held a dedicated [NPRR1296 workshop](#) during the November meeting featuring robust discussion and presentations from ERCOT, the IMM and multiple stakeholders. NPRR1296 remains tabled and ERCOT intends to file comments with revised language to continue moving the discussion forward.



Planning Criteria

Discussion continues regarding key revision requests seeking to address regulatory requirements impacting transmission planning criteria.

NPRR1286

Establish Multi-Value Criteria for Resiliency-Related Transmission Project Evaluation

Establishes new multi-value planning criteria to address the process for determining whether ERCOT will endorse a reliability or economic project that addresses a resiliency issue., in accordance with [16 TAC § 25.101](#).

- ***Posted May 21, 2025***
- ***Current Status: tabled at PRS, referred to ROS***

PGRR127

Addition of Proposed Generation to the Planning Models

Outlines the additional generators that may be included in planning models to address the generation shortfall introduced by the implementation of House Bill (HB) 5066 (88R) and unprecedented load growth in Texas.

In order to plan the ERCOT Transmission Grid to interconnect the forecasted load, the planning models need to have sufficient generation for the cases to solve.

- ***Posted May 30, 2025***
- ***Current Status: tabled at ROS, referred to PLWG***



Standard Form Agreement (SFA)

The Standard Form Market Participant Agreement outlines the terms and conditions under which ERCOT and the participant will fulfill their respective duties and responsibilities.

- The SFA includes definitions and sections regarding key provisions such as Notice, Transfers Breach and Default that more appropriately belong in the Protocols.
- Revisions to the SFA are also needed to reflect the Texas Supreme Court's determination in *CPS Energy v. ERCOT* that ERCOT is an arm of government that has sovereign immunity and is subject to the Public Utility Commission of Texas' exclusive jurisdiction.

NPRR1312

Revisions to the Standard Form Agreement (SFA)

Amends the SFA and transfers certain sections to the Protocols, including establishing a new section regarding Notice and modernizing the Notice language, transferring Breach and Default, and amending the definition of a Force Majeure.

The revision request also amends Standard Form Black Start Agreement and Standard Form Must Run Agreement to align with revisions to the SFA.

- ***Posted: November 26, 2025***
- ***Next Step: PRS for language consideration***

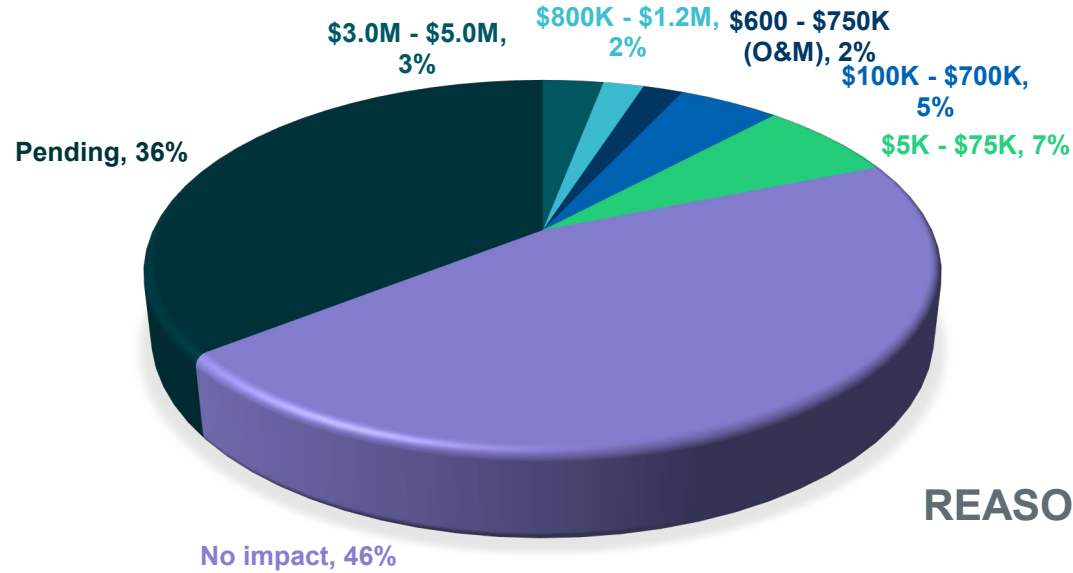


Appendix

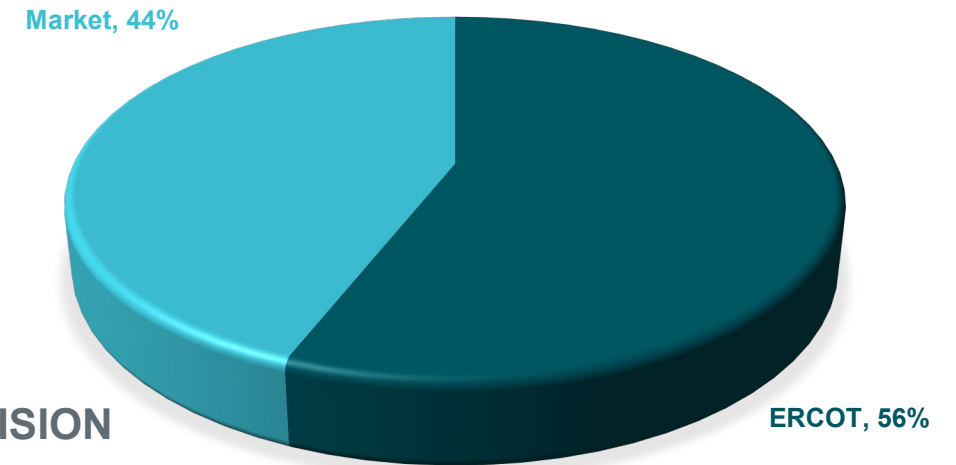


61 Revision Requests in Process

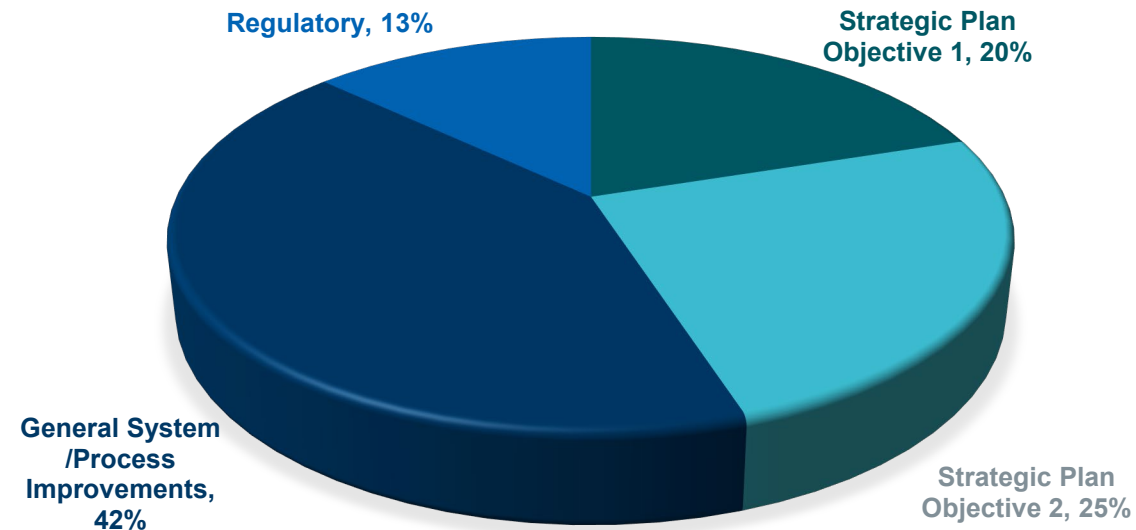
BUDGETARY IMPACT



SPONSORSHIP

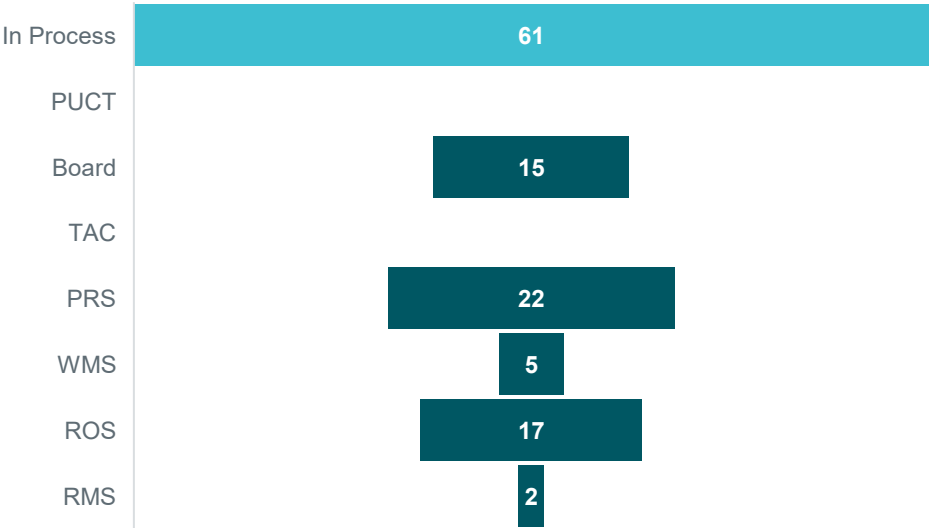


REASON FOR REVISION

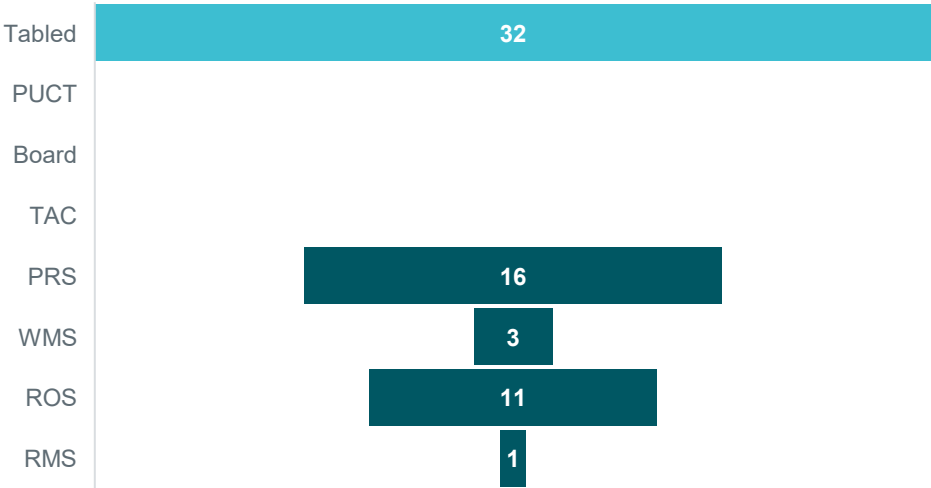


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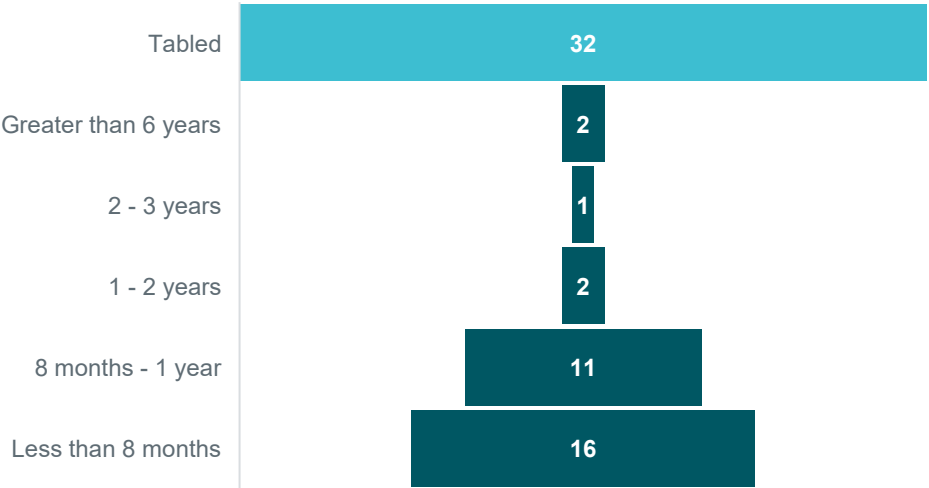
LOCATION OF REVISION REQUESTS



LOCATION OF TABLED REVISION REQUESTS



LENGTH TABLED

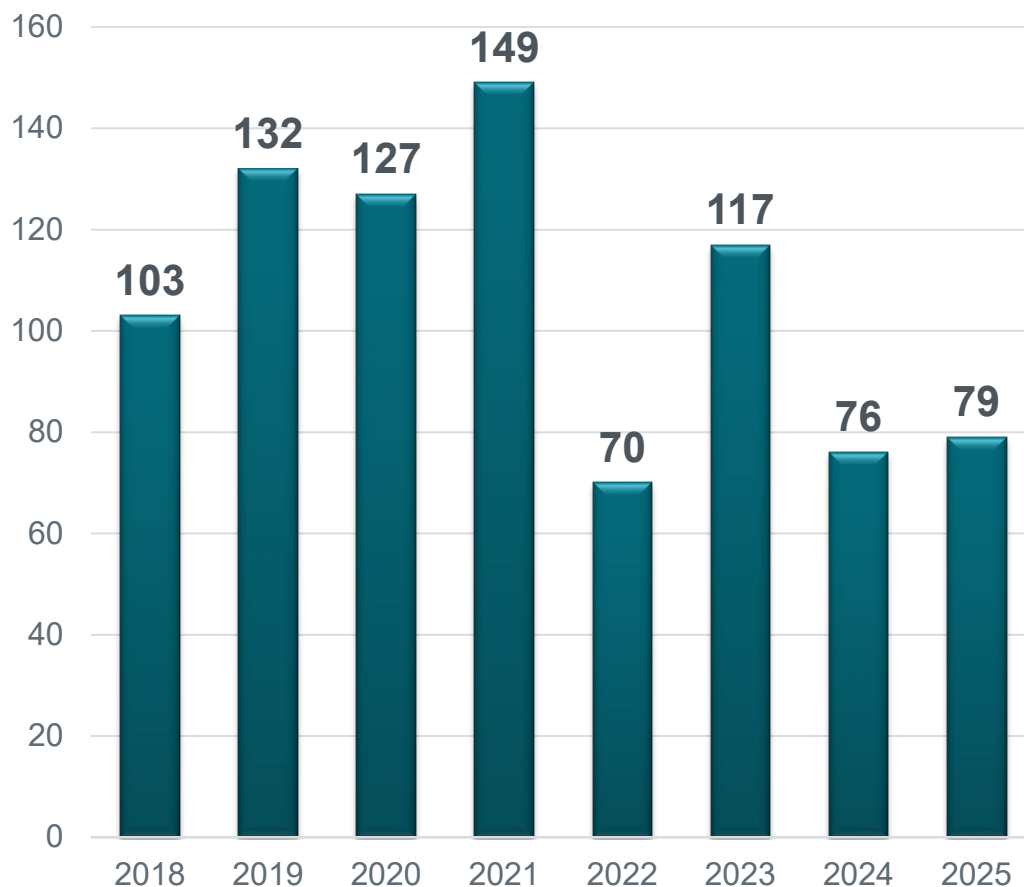


Aging Revision Requests

Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 6 years (7/7/19)	Tabled at PRS. Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Recently, the District has issued a verdict against SB 1938 -a decision that is likely to be appealed. ERCOT will continue to comply with SB 1938 unless and until a final judicial determination requires otherwise.
PGRR073, Related to NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 6 years (8/8/19)	Tabled at ROS. See NPRR956
SCR826, ERCOT.com Enhancements [Residential Consumer]	2 – 3 years (7/25/23)	Tabled at PRS. ERCOT presented at the December PRS an online “request form” under construction for 2025 to facilitate these sorts of dashboard/website requests
NPRR1255, Introduction of Mitigation of ESRs [ERCOT]	1 - 2 years (10/17/24)	Tabled at PRS. ERCOT filed comments in April 2025 modifying the original proposal based on discussions with stakeholders. PRS referred the issue to WMS for continued review of this modified proposal. Referred to CMWG for further review.
PGRR122, Reliability Performance Criteria for Loss of Load [ERCOT]	1 – 2 years (12/5/24)	Tabled at ROS. ROS referred to DWG and PLWG, but the Large Load Working Group (LLWG) is also discussing. ERCOT is currently conducting additional analysis for discussions at these groups.
NPRR1264, Creation of a New Energy Attribute Certificate Program, & Associated Guide Revisions [TEBA]	8 months – 1 year (1/15/25)	Tabled. ERCOT is working on an alternative EAC Program proposal.
NPRR1272, Voltage Support at Private Use Networks [Occidental]	8 months – 1 year (3/12/25)	Tabled at PRS. Referred to ROS. ROS assigned to PLWG/VPWG.
PGRR124, ESR Maintenance Exception to Modifications [Tesla]	8 months – 1 year (3/6/25)	Tabled at ROS. The sponsor has had conversations with ERCOT Staff regarding advanced grid services and has requested this item remain tabled.
NPRR1275, Expansion of Qualifying Pipeline Definition for Firm Fuel Supply Service in Phase 3 [ERCOT]	8 months – 1 year (4/9/25)	Tabled at PRS. PRS tabled NPRR1275 in accordance with PUCT Staff’s memorandum in Project 56000 and the PUCT’s discussion at the April 24, 2025 Open Meeting. The PUCT has since opened a rulemaking (Project 58434) to address FFSS, and the outcome of that effort will dictate the next steps on NPRR1275



Statistics – New Revision Requests Submitted



New Revision Requests submitted since September Board

[NPRR1302](#), Addition of a Market Participant Service Portal within the MIS Certified Area and Revision of Forms

[NPRR1303](#), Modernize Submission of Declarations of Natural Gas Pipeline Coordination

[PGRR132](#), Update to Standard Generation Interconnection Agreement (SGIA) Requirement

[NPRR1304](#), Move OBD to Section 22 – Procedure for Identifying Resource Nodes

[NPRR1305](#), Move OBD to Section 23 – Counter-Party Credit Application Form

[NPRR1306](#), Removal of Digital Certificate References for Market Participants with ERCOT MIS Access

[VCMRR045](#), Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access

[COPMGRR052](#), Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access

[RMGRR184](#), Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access

[PGRR133](#), Clarifying Legacy Generation Breaker Control for PGRR115 Implementation

[PGRR134](#), Interconnection Studies Reform for Dispatchable Loads

[PGRR135](#), Large Load Interconnection Queue Process Revision

[NPRR1307](#), Revised Definition of Mitigation Plan

[NOGRR281](#), Related to NPRR1307, Revised Definition of Mitigation Plan

[NOGRR282](#), Large Electronic Load Ride-Through Requirements

[NPRR1308](#), Related to NOGRR282, Large Electronic Load Ride-Through Requirements

[NPRR1309](#), Dispatchable Reliability Reserve Service Ancillary Service

[NOGRR283](#), Related to NPRR1309, Dispatchable Reliability Reserve Service Ancillary Service

[NOGRR284](#), Related to NPRR1310, Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor

[NPRR1310](#), Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor



Acronyms

Acronym	Term
ASDC	Ancillary Service Demand Curve
CMWG	Congestion Management Working Group
DWG	Dynamics Working Group
DRRS	Dispatchable Reliability Reserve Service
DWG	Dynamics Working Group
EAC	Energy Attribute Credit
ESR	Energy Storage Resource
IMM	Independent Market Monitor
LEL	Large Electronic Load
LLWG	Large Load Working Group
MIS	Market Information System
NOIE	Non-Opt-In Entity
NOGRR	Nodal Operating Guide Revision Request
NPRR	Nodal Protocol Revision Request
OBD	Other Binding Document
OKR	Objectives and Key Results
OWG	Operations Working Group
PGRR	Planning Guide Revision Request
PLWG	Planning Working Group



Acronyms

Acronym	Term
PRS	Protocol Revision Subcommittee
QSE	Qualified Scheduling Entity
RDR	Residential Demand Response
REP	Retail Electric Provider
RFI	Request for Information
ROS	Reliability and Operations Working Group
RTC+B	Real-Time Co-optimization plus Batteries
RTP	Regional Transmission Plan
RUC	Reliability Unit Commitment
SCR	System Change Request
SFA	Standard Form Agreement
SGIA	Standard Generation Interconnection Agreement
TAC	Technical Advisory Committee
TSP	Transmission Service Provider
VCMRR	Verifiable Cost Manual Revision Request
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee
WMWG	Wholesale Market Working Group

