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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 | | November 19, 2025 | |
| Action | | Recommended Approval | |
| Timeline | | Normal | |
| Estimated Impacts | | Cost/Budgetary: None  Project Duration: No project required | |
| Proposed Effective Date | | The first of the month following Public Utility Commission of Texas (PUCT) approval | |
| Priority and Rank Assigned | | Not applicable | |
| Nodal Protocol Sections Requiring Revision | | 21.4.4, Protocol Revision Subcommittee Review and Action  21.4.5, Comments to the Protocol Revision Subcommittee Report | |
| Related Documents Requiring Revision/Related Revision Requests | | Commercial Operation Guide  4.3.3, WMS Review and Action  4.3.4, Comments to the WMS Report  Load Profiling Guide  2.3.3, RMS Review and Action  2.3.4, Comments to the RMS Report  Nodal Operating Guide  1.3.3.3, ROS Review and Action  1.3.3.4, Comments to the ROS Report  Planning Guide  1.2.3.3, ROS Review and Action  1.2.3.4, Comments to the ROS Report  Resource Registration Glossary  1.2.3.3, ROS Review and Action  1.2.3.4, Comments to the ROS Report  Retail Market Guide  3.3.3, Retail Market Subcommittee Review and Action  3.3.4, Comments to the Retail Market Subcommittee Report  Settlement Metering Operating Guide  10.3.3, Wholesale Market Subcommittee Review and Action  10.3.4, Comments to the Wholesale Market Subcommittee Report  Verifiable Cost Manual  13.3.3, Wholesale Market Subcommittee Review and Action  13.3.4, Comments to the Wholesale Market Subcommittee Report  Electric Reliability Council of Texas Technical Advisory Committee Procedures | |
| 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 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 Subcommittees with the discretion to consider late-filed comments. The process for reviewing late-filed comments at the beginning of each subcommittee meeting will be outlined in the TAC Procedures, which will go through a separate approval process from this NPRR. | |
| PRS Decision | | On 9/17/25, PRS voted unanimously to table NPRR1298. All Market Segments participated in the vote.  On 10/8/25, PRS voted to recommend approval of NPRR1298 as revised by the 9/29/25 Vistra comments. There were five opposing votes from the Consumer (Occidental), Independent Power Marketer (IPM) (Tenaska), and Investor Owned Utility (IOU) (3) (CNP, AEPSC, TNMP) Market Segments, and two abstentions from the Cooperative (PEC) and IOU (Oncor) Market Segments. All Market Segments participated in the vote.  On 11/12/25, PRS voted to endorse and forward to TAC the 10/8/25 PRS Report and 10/27/25 Impact Analysis for NPRR1298. There were two opposing votes from the Consumer (Occidental) and IOU (CNP) Market Segments, and two abstentions from the Cooperative (PEC) and IOU (TNMP) Market Segments. 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.  On 10/8/25, participants reviewed the 9/29/25 Vistra comments and discussed that the proposal to revise the TAC Procedures might undergo a testing period of four to six months for stakeholders to determine its utility. Some participants expressed doubt that a Protocol change is necessary, offered that committees already have sufficient processes to consider materials, and voiced concern for eroding an existing healthy stakeholder process.  On 11/12/25, participants reviewed the 10/27/25 Impact Analysis. | |
| TAC Decision | | On 11/19/25, TAC voted to recommend approval of NPRR1298 as recommended by PRS in the 11/12/25 PRS Report. There was one opposing vote from the IOU (AEPSC) Market Segment, and six abstentions from the Consumer (2) (CMC Steel, Air Liquide), Independent Generator (2) (Jupiter Power, Calpine), and IOU (2) (TNMP, CNP) Market Segments. All Market Segments participated in the vote. | |
| Summary of TAC Discussion | | On 11/19/25, in addition to TAC review of the items below, some participants noted the robust discussions at previous meetings, and reiterated concerns that NPRR1298 is unnecessary and may have unintended consequences, such as not hearing all parties, or potentially disadvantaging Entities that want to be responsive to comments submitted by other Entities. | |
| Explanation of Opposing TAC Votes | | **AEP Service Corporation (AEPSC)** With or without NPRR1298, late comments will still be considered at the discretion of PRS. I did not want to support—or even abstain from—a measure that, in effect, does nothing.  If the Board adopts TAC’s recommendation to approve NPRR1298, there will be no material harm to the stakeholder process since, as noted, NPRR1298 has no practical effect. | |
| TAC Review/Justification of Recommendation | | Revision Request ties to Reason for Revision as explained in Justification  Impact Analysis reviewed and impacts are justified as explained in Justification  Opinions were reviewed and discussed  Comments were reviewed and discussed (if applicable)  Other: (explain) | |

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| **Opinions** | |
| **Credit Review** | ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed NPRR1298 and do not believe that it requires changes to credit monitoring activity or the calculation of liability. |
| **Independent Market Monitor Opinion** | The IMM has no opinion on NPRR1298. |
| **ERCOT Opinion** | ERCOT supports approval of NPRR1298. |
| **ERCOT Market Impact Statement** | ERCOT Staff has reviewed NPRR1298 and believes that it reiterates the existing discretion of PRS to consider comments filed to a PRS Report less than 6 days prior to a PRS meeting, similar to the existing discretion of PRS to consider comments posted after the 14-day comment period. |

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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. |
| Vistra 092925 | Offered clarifying language in response to stakeholder feedback and the 9/10/25 ERCOT comments |

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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. 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) The comments to the PRS Report will be considered at the next regularly scheduled PRS meeting that is at least six days from the posting date. Comments posted less than six days prior to the next regularly scheduled PRS meeting may be considered at the discretion of the PRS.

(3) For TAC, the comments to the PRS Report will be considered at the next regularly scheduled TAC meeting where the Revision Request is being considered.