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| NPRR Number | [1310](https://www.ercot.com/mktrules/issues/NPRR1310) | NPRR Title | Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor |
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| Date | | December 3, 2025 | |
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| Submitter’s Information | | | |
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| Market Segment | | Independent Generator / Independent Power Marketer | |

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| Comments |

Texas Competitive Power Advocates (TCPA) appreciates ERCOT’s significant efforts to develop options for implementing the Dispatchable Reliability Reserve Service (DRRS) that satisfies the statutory requirements of PURA § 39.159, including the Public Utility Commission of Texas’ (Commission’s) finding that “DRRS is one of the tools in the market design toolbox that may assist in meeting the ERCOT reliability standard.”[[1]](#footnote-1) TCPA, like other stakeholders, is continuing to digest NPRR1310 (and accompanying NOGRR284) alongside the alternative versions presented in NPRR1309 (and accompanying NOGRR283). Accordingly, TCPA has not taken a substantive position at this time on either NPRR1310/NOGRR284 or NPRR1309/NOGRR283. However, noting that ERCOT is asking the ERCOT Board of Directors at its December 8-9, 2025 meeting to designate only the latter set as Board Priority Revision Requests for consideration at the June 2026 Board meeting,[[2]](#footnote-2) TCPA is submitting these comments to urge ERCOT stakeholders to vote at the December 10, 2025 Protocol Revision Subcommittee (PRS) meeting to similarly bestow Urgent status to NPRR1310 (and will similarly urge stakeholders to do the same for NOGRR284 at the January 8, 2026 Reliability and Operations Subcommittee (ROS) meeting). TCPA believes that both the ERCOT Board and the Commission would benefit from having stakeholder input and feedback on both versions of DRRS on the same timeline if possible, and granting Urgent status to both versions would support that objective by providing a more complete option set to decision makers.

Regardless of which version of DRRS is implemented, it is critical that it be capable of achieving both its operational objectives and contributing to satisfying the reliability standard for the ERCOT region. DRRS is explicitly part of the broader reliability standard for the ERCOT region established under PURA § 39.159(b)[[3]](#footnote-3) and required under PURA § 39.159(c) to ensure that the reliability standard is met by dispatchable resources with seasonally appropriate attributes, including the ability “to ensure winter performance *for several days*.”[[4]](#footnote-4) The Commission has specifically implemented PURA § 39.159(b)(1) in its adoption of 16 TAC § 25.508.[[5]](#footnote-5)

Furthermore, in the statutorily-required review of Ancillary Services in 2024, the Commission determined that ERCOT should both “design DRRS to ensure that it meets its primary role as an ancillary service to mitigate operational risks in real time and reduce the use the use of Reliability Unit Commitment” and “design flexibility into the mechanism for procuring DRRS so that, if the Commission determines that the price for or quantity of DRRS should be modified in the future to provide targeted additional generator revenue, this could be done without requiring significant additional system changes and without creating artificial scarcity or other detrimental effects on the market.”[[6]](#footnote-6) In Commission Staff’s recent status update to the Commission, it was noted that “ERCOT is in the process of redesigning DRRS to include a release factor [that] would permit DRRS to be used for resource adequacy in addition to its primary function of mitigating operational uncertainty.”[[7]](#footnote-7) Again, without TCPA taking any position on NPRR1310/NOGRR284 at this time, it does appear at face value that NPRR1310/NOGRR284 are better designed to reflect this guidance (and thus the conclusion that stakeholders bestow Urgent status to NPRR1310 and NOGRR284 alongside NPRR1309 and NOGRR283 as stakeholders review the merits of each set). To further bolster the need to adopt the Commission’s guidance as part of the stakeholder review process to address looming resource adequacy concerns and grant Urgent Status to NPRR 1310/NOGRR 284, the recently issued Aurora Energy Research Report (Aurora Report) states “DRRS Ancillary Service Plus [NPRR 1310] provides the largest reliability improvement at the lowest system cost”[[8]](#footnote-8). Further, based on its evaluation of multiple scenarios, the Aurora Report demonstrated that DRRS Plus greatly reduces load shedding and incentivizes 5 GW of long-duration dispatchable capacity (both of which are crucial for maintaining resource adequacy).[[9]](#footnote-9) The results of this report for both versions of DRRS should be fully considered by all market participants throughout the stakeholder review process with the benefit of being part of a parallel discussion.

TCPA appreciates stakeholders’ consideration of this recommendation and looks forward to evaluating and discussing the merits of both options for DRRS implementation with other stakeholders, ERCOT, and Commission Staff.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None

1. Project No. 55845 (Review of Ancillary Services in the ERCOT Market), *Commission Findings and Final Report* at 5 (Jan. 14, 2025); <https://interchange.puc.texas.gov/search/documents/?controlNumber=55845&itemNumber=46>. [↑](#footnote-ref-1)
2. *See* Item 6.1: Dispatchable Reliability Reserve Service Ancillary Service on the December 8-9, 2025 ERCOT Board of Directors meeting agenda. <https://www.ercot.com/files/docs/2025/12/02/6.1-NPRR1309-Dispatchable-Reliability-Reserve-Service-Ancillary-Service-and-NOGRR283.pdf> [↑](#footnote-ref-2)
3. PURA § 39.159(b): “The commission shall ensure that the independent organization certified under Section 39.151 for the ERCOT power region: (1) *establishes requirements to meet the reliability needs of the power region*; (2) periodically, but at least annually, determines the quantity and characteristics of ancillary or reliability services necessary to ensure appropriate reliability during extreme heat and extreme cold weather conditions and during times of low non-dispatchable power production in the power region; (3) procures ancillary or reliability services on a competitive basis to ensure appropriate reliability during extreme heat and extreme cold weather conditions and during times of low non-dispatchable power production in the power region; (4) develops appropriate qualification and performance requirements for providing services under Subdivision (3), including appropriate penalties for failure to provide the services; and (5) sizes the services procured under Subdivision (3) to prevent prolonged rotating outages due to net load variability in high demand and low supply scenarios.” (*emphasis added*). Note that recently-adopted 16 Texas Admin. Code (TAC) 25.508 “implements Public Utility Regulatory Act (PURA) §39.159(b)(1) as revised by Section 18 of Senate Bill (S.B.) 3 during the Texas 87th Regular Legislative Session.” *See* Project No. 54584 (“Reliability Standard for the ERCOT Region”), *Order Adopting New §25.508* at 1 (September 9, 2024). [↑](#footnote-ref-3)
4. PURA § 39.159(c): “the commission shall ensure that: (1) resources that provide services under Subsection (b) are *dispatchable and able to meet continuous operating requirements* for the season in which the service is procured; (2) *winter resource capability qualifications* for a service described by Subsection (b) include on-site fuel storage, dual fuel capability, or fuel supply arrangements to *ensure winter performance for several days*; and (3) *summer resource capability qualifications* for a service described by Subsection (b) *include facilities or procedures to ensure operation under drought conditions*.” (*emphasis added*). [↑](#footnote-ref-4)
5. Project No. 54584 (Reliability Standard for the ERCOT Region), *Order Adopting New §25.508* at 1 (Sept. 9, 2024). <https://interchange.puc.texas.gov/Documents/54584_106_1426419.PDF> [↑](#footnote-ref-5)
6. *Supra* Note 1. [↑](#footnote-ref-6)
7. *Id*., *Staff Status Update for 2024 AS Review* at 4 (Oct. 30, 2025); <https://interchange.puc.texas.gov/search/documents/?controlNumber=55845&itemNumber=47> [↑](#footnote-ref-7)
8. Project No. 55797, (Dispatchable Reliability Reserve Service (DRRS)), *Aurora Energy Research Report* at Page 13 (Slide 3) (November 10, 2025); https://interchange.puc.texas.gov/Documents/55797\_10\_1556588.ZIP. [↑](#footnote-ref-8)
9. Id. at Slide 15 (Page 25) and 20 (Page 30). [↑](#footnote-ref-9)