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| VCMRR Number | [045](https://www.ercot.com/mktrules/issues/VCMRR045) | | VCMRR Title | Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access |
| Date of Decision | | December 3, 2025 | | |
| Action | | Tabled | | |
| Timeline | | Normal | | |
| Proposed Effective Date | | To be determined | | |
| Priority and Rank Assigned | | To be determined | | |
| Verifiable Cost Manual Sections Requiring Revision | | | 12.2, Verifiable Cost Appeal Process and Timeline  Appendix 12, Standard Affidavits | |
| Related Documents Requiring Revision/Related Revision Requests | | | Commercial Operations Market Guide Revision Request (COPMGRR) 052, Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access  Nodal Protocol Revision Request (NPRR) 1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access  Retail Market Guide Revision Request (RMGRR) 184, Related to NPRR1306, Removal of Digital Certificate References for Market Participants with ERCOT MIS Access | |
| Revision Description | | | This Verified Cost Manual Revision Request (VCMRR) replaces the concept of “Digital Certificates” throughout the Verified Cost Manual with a new concept where individuals affiliated with a Market Participant can be granted certain restricted access by each individual Market Participant’s User Security Administrator (USA). | |
| 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 VCMRR accompanies NPRR1306, which proposes changes to the binding language in the Protocols that limit ERCOT to using Digital Certificates for Market Participants’ access to the Market Information System (MIS) Secure Area and the MIS Certified Area.  These changes allow ERCOT to implement modern technology and systems for access for Market Participants in a more secure way using “multi-factor authentication” (MFA). These modifications also future-proof the Protocols which will allow ERCOT, and the industry, to continue to provide efficient and secure access as technology changes.  This VCMRR also enables ERCOT to improve user experience through future projects to improve ERCOT’s security posture. Currently, one user is required to have separate Digital Certificates for each Market Participant and each instance of registration the Market Participant they represent has in ERCOT systems. For an individual who is affiliated with multiple Market Participants, each of which may have multiple registered instances, that one person will have multiple Digital Certificates to keep track of, which is unwieldy when navigating which Digital Certificate is being used for which Market Participant. NPRR1306 will allow future projects to remove Digital Certificates as a mandatory use case for each Market Participant represented and, instead, access will be allowed through a single identity. | |
| WMS Decision | | | On 12/3/25, WMS voted unanimously to table VCMRR045. All Market Segments participated in the vote. | |
| Summary of WMS Discussion | | | On 12/3/25, WMS reviewed VCMRR045 and NPRR1306. Some participants suggested tabling until PRS reviews ERCOT’s anticipated project timeline. Other participants requested eventual standardization of the audit process as well. | |

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| **Opinions** | |
| **Credit Review** | Not applicable |
| **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 | Nicholas Jessett / Katherine Gross |
| E-mail Address | [nicholas.jessett@ercot.com](mailto:nicholas.jessett@ercot.com) / [katherine.gross@ercot.com](mailto:katherine.gross@ercot.com) |
| Company | ERCOT |
| Phone Number | 512-248-6746 / 512-225-7184 |
| Cell Number |  |
| Market Segment | Not Applicable |

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| **Market Rules Staff Contact** | |
| **Name** | Jordan Troublefield |
| **E-Mail Address** | [jordan.troublefield@ercot.com](mailto:jordan.troublefield@ercot.com) |
| **Phone Number** | 512-248-6521 |

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| **Comments Received** | |
| **Comment Author** | **Comment Summary** |
| None |  |

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| Market Rules Notes |

None

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| Proposed Verifiable Cost Manual Language Revision |

**12.2 Verifiable Cost Appeal Process and Timeline**

(1) It is the responsibility of Filing Entities to initiate appeals of rejected Verifiable Costs. This is done by submitting a written appeal to ERCOT via a Service Request. The Service Request is available on the ERCOT Market Information System (MIS). The Service Request must be submitted by an Authorized Representative.

(2) Appeals must be submitted no more than twenty (20) Business Days after ERCOT informs a Filing Entity of its rejection of a Filing Entity’s Verifiable Cost submission. If a Filing Entity does not submit an appeal within the twenty (20) Business Day period, the Filing Entity is deemed to have accepted ERCOT’s determination of approved Verifiable Costs.

(3) Subsequent to the filing of an appeal, a Filing Entity may request a review meeting with ERCOT to allow the Filing Entity an opportunity to provide any clarification or information supporting the appeal. The review meeting must be scheduled to occur at a mutually convenient time no more than twenty (20) Business Days after the Filing Entity submitted the appeal. The review meeting may be held over the phone. When scheduling a review meeting, the Filing Entity must name a primary and an alternate representative. ERCOT shall designate one or more director-level (or more senior) representatives, who must be external to ERCOT’s Verifiable Cost function, to meet with the Filing Entity at the review meeting.

(4) The Filing Entity must submit a position paper for review by the ERCOT representative(s) designated in accordance with paragraph (3) above to ERCOT no more than twenty (20) Business Days after submitting the appeal. The position paper must:

(a) Explain why a cost or a portion thereof should or should not be included in the Filing Entity’s Verifiable Costs;

(b) Include copies of documentation that proves the costs were incurred; and

(c) As applicable, reference all sections within the Nodal Protocols, this Manual, or Other Binding Documents that support inclusion or exclusion of the disputed costs.

(5) ERCOT will provide Notice of its appeal decision to the Filing Entity, and it shall provide an explanation of the rationale underlying the decision.

(6) If ERCOT agrees with the Filing Entity’s position, ERCOT will update the Filing Entity’s Verifiable Costs to the extent approved by ERCOT. ERCOT shall specify the effective date in the Notice provided pursuant to paragraph (5) above.

(7) If additional costs are approved as a result of the appeal process, the additional costs will only be used prospectively from the date specified in paragraph (6) above and shall not be used to resettle historic Operating Days.

(8) If, as a result of the appeal, ERCOT determines that the Verifiable Cost Manual and/or related Protocols should be revised, ERCOT will draft and submit one or more Verifiable Cost Manual and/or Protocol revision requests, as applicable, through the appropriate revision request process.

(9) ERCOT will make a decision on an appeal no more than forty (40) Business Days after an appeal is submitted.

(10) If an appeal is rejected, in whole or in part, the Filing Entity may avail itself of the ADR process in accordance with Protocol Section 20, Alternative Dispute Resolution Procedure.

**Appendix 12: Standard Affidavits**

The following pages contain the standard affidavits required when the Resource Entity and the QSE have agreed that the Resource Entity will submit verifiable cost data to ERCOT. Both affidavits must be executed and sent to ERCOT.

**STATE OF TEXAS §**

**§**

**COUNTY OF \_\_\_\_\_\_\_\_ §**

**VERIFIABLE COSTS AFFIDAVIT PURSUANT TO SECTION 5.6.1**

**FOR RESOURCE ENTITY**

**BEFORE ME,** the undersigned notary, on this day personally appeared the following individual: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, whose identity is known to me. After being first duly sworn, the named individual deposed and stated the following:

1. “My name is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. I am the Authorized Representative of the Resource Entity (RE) identified in Paragraph 2. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am employed as \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, having its principal place of business at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. This company is registered as an RE with ERCOT.

3. I agree to the terms as described below and that such terms satisfy the requirement in Protocol Section 5.6.1, Verifiable Costs, for an RE to assume the responsibility of providing verifiable costs to ERCOT.

4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is the Qualified Scheduling Entity (QSE) agreeing that RE will assume the responsibility of providing verifiable costs to ERCOT. QSE has executed a similar affidavit in order to comply with Protocol Section 5.6.1, and effectuate this transfer of responsibility.

5. This Affidavit pertains to the following Resource(s) (Resource Mnemonic(s)): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. If naming multiple resources attach as separate document. Named resources must match list provided in QSE Affidavit.

6. RE acknowledges the following:

a. All RUC Instructions from ERCOT will be sent to QSE.

b. All financial arrangements are between ERCOT and QSE.

c. Verifiable costs are Resource-specific costs, regardless of who submits them. QSE costs shall not be accepted by ERCOT even when verifiable costs are submitted by RE.

d. RE will have sole responsibility for submitting verifiable costs to ERCOT and such arrangement will remain in place until RE switches to another QSE or terminates its registration with ERCOT. If RE switches to another QSE, the new QSE assumes responsibility for submitting or updating verifiable costs unless new affidavits are submitted to ERCOT allowing RE to continue to submit or update existing verifiable costs in accordance with Protocol Section 5.6.1.

e. QSE will have responsibility for informing RE to update or file verifiable costs with ERCOT.

f. During the verifiable cost approval process, only RE will have the authority to appeal specific cost categories with ERCOT, ERCOT Board of Directors, or the Public Utility Commission of Texas (PUCT).

g. RE will have sole responsibility for the accuracy of the data submitted to ERCOT. QSE is not responsible for the accuracy of the data submitted to ERCOT by RE.

7. ERCOT will not share Resource-specific costs (except for final approved costs) with QSE without further written permission by RE.”

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Affiant for RE

**SUBSCRIBED AND SWORN TO BEFORE ME** on this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public, State of Texas

**STATE OF TEXAS §**

**§**

**COUNTY OF \_\_\_\_\_\_\_\_ §**

**VERIFIABLE COSTS AFFIDAVIT PURSUANT TO SECTION 5.6.1**

**FOR QUALIFIED SCHEDULING ENTITY**

**BEFORE ME,** the undersigned notary, on this day personally appeared the following individual: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, whose identity is known to me. After being first duly sworn, the named individual deposed and stated the following:

1. “My name is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. I am the Authorized Representative of the Qualified Scheduling Entity (QSE) identified in Paragraph 2. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.

2. I am employed as \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, having its principal place of business at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. This company is registered as a QSE with ERCOT.

3. I agree to the terms as described below and that such terms satisfy the requirement in Protocol Section 5.6.1, Verifiable Costs, for a Resource Entity (RE) to assume the responsibility of providing verifiable costs to ERCOT.

4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ is the RE agreeing that it will assume the responsibility of providing verifiable costs to ERCOT. RE has executed a similar affidavit in order to comply with Protocol Section 5.6.1, and effectuate this transfer of responsibility.

5. This Affidavit pertains to the following Resource(s) (Resource Mnemonic(s)): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. If naming multiple resources attach as separate document. Named resources must match list provided in RE Affidavit.

6. QSE acknowledges the following:

h. All RUC Instructions from ERCOT will be sent to QSE.

i. All financial arrangements are between ERCOT and QSE.

j. Verifiable costs are Resource-specific costs, regardless of who submits them. QSE costs shall not be accepted by ERCOT even when verifiable costs are submitted by RE.

k. RE will have sole responsibility for submitting verifiable costs to ERCOT and such arrangement will remain in place until RE switches to another QSE or terminates its registration with ERCOT. If RE switches to another QSE, the new QSE assumes responsibility for submitting or updating verifiable costs unless new affidavits are submitted to ERCOT allowing RE to continue to submit or update existing verifiable costs in accordance with Protocol Section 5.6.1.

l. QSE will have responsibility for informing RE to update or file verifiable costs with ERCOT.

m. During the verifiable cost approval process, only RE will have the authority to appeal specific cost categories with ERCOT, ERCOT Board of Directors, or the Public Utility Commission of Texas (PUCT).

n. RE will have sole responsibility for the accuracy of the data submitted to ERCOT. QSE is not responsible for the accuracy of the data submitted to ERCOT by RE.

7. ERCOT will not share Resource-specific costs (except for final approved costs) with QSE without further written permission by RE.”

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Affiant for QSE

**SUBSCRIBED AND SWORN TO BEFORE ME** on this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public, State of Texas

**Election to use the Expected Minimum On-Line Time for Quick Start Generation Resource**

Pursuant to ERCOT Protocol Section 4.4.9.4.1, Mitigated Offer Cap, ERCOT will apply a minimum On-Line time value in determining the incremental costs for the variable O&M component of calculated mitigated offer cap for a Quick Start Generation Resource (QSGR). The expected minimum On-Line time applied in determining the variable O&M term is equal to the registered minimum On-Line time value, unless the Resource Entity (RE) or QSE, representing the QSGR, has notified ERCOT that the expected minimum On-Line time should be different than the registered value. By submitting this form, the RE or QSE acknowledges that the expected minimum On-Line time is different from the registered value. The Authorized Representative of the RE or QSE must sign this form. An electronic copy of the signed form may be attached in PDF format to a Service Request. The Service Request is available on the ERCOT Market Information System (MIS) (Applications, Service Request). The Service Request must be submitted by an Authorized Representative. Complete all required fields then choose Request Type “MP Registration” and Request Sub-Type “Resource/Asset Registration”. An alternative to the Service Request may be used by sending the signed form to ERCOT by email to MPRegistration@ercot.com or via facsimile: (512) 225-7079.

**Please note that the election to use the expected minimum On-Line time for a specific Resource is *irrevocable for the season(s) specified in the form.* For seasonal changes to be effective, ERCOT must receive the completed election form at least fifteen (15) days prior to the start of the elected season. [Season is defined by Protocol Section 2, Definitions and Acronyms, as follows: Winter months are December, January and February; Spring months are March, April and May; Summer months are June, July and August; Fall months are September, October and November.]**

|  |  |
| --- | --- |
| **Requestor**: | RE:  or QSE representing QSGR: |

**Duns Number**:

**Name of Generator Site**:

**County:**

Identify all Resource(s) which will use expected minimum On-Line time:

|  |  |  |  |
| --- | --- | --- | --- |
| **Unit Name** | **Resource ID** | **Expected Minimum On-Line Time (hr)(1)** | **Season** |
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**Note: Resources requesting Expected Minimum On-Line Times less than 1 hour must have approved verifiable costs before the expected value is approved.**

**Request date:**      

*By signing below I affirm that all statements made and information provided in this form are true, correct and complete. I understand that the elections for the specific Resource(s) made in this form are irrevocable for the remainder of the season in which they are made.*

**For Resource Entity:**

|  |  |
| --- | --- |
| Printed name of Authorized Representative: |  |
| Signature of Authorized Representative: |  |
| Title: |  |