



Item 6.2: High-Impact Policy Discussions in the Stakeholder Process

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Board of Directors Meeting

February 9-10, 2026

Purpose

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

For information only

No action is requested; for discussion only.

Key Takeaways

- Addressing issues related to the interconnection and reliability of Large Loads continues to be a key area of focus and collaboration with the Commission and stakeholders.
- New key initiatives regarding Firm Fuel Supply Service (FFSS) Phase 3 and reliability procurement process improvements have been added this cycle.
- 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

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)

Large Load Interconnection

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

Dispatchable Reliability Reserve Service (DRRS)

- ERCOT engaged [Aurora Energy Research](#) to assess resource adequacy needs and the impact of market design changes on both reliability and costs. ERCOT hosted a workshop in December where Aurora presented the report and solicited feedback.
- ERCOT and TAC Leadership have scheduled a series of four workshops and a special TAC meeting to review comments and discuss both DRRS-related NPPRs in anticipation of a potential first vote at the April PRS meeting.

NPPR1309

Dispatchable Reliability Reserve Service Ancillary Service

Board Priority - 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
- Current Status:** *tabled at PRS for continued discussions of both NPPRs at dedicated DRRS workshops*

NPPR1310

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

Urgent - 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
- Current Status:** *tabled at PRS for continued discussions of both NPPRs at dedicated DRRS workshops*

• Key Takeaway

Proposed timeline in place for a TAC recommendation regarding NPPR1309 for consideration at the June Board.

Large Load Issues

Senate Bill (SB) 6 ERCOT continues to evaluate and implement the SB 6 Large Load related provisions through participation in PUC rulemaking projects and development of ERCOT action items.

Batch Study Process Development of a new interconnection process grouping Large Loads that meet certain stringent requirements into a single study to allow existing and planned transmission capacity to be allocated and reserved.

NOGRR282

Large Electronic Load Ride-Through Requirements

Board Priority - 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 issued Request for Information (RFIs) to the Transmission Service Providers (TSPs) regarding LEL ride-through capabilities. ERCOT submitted comments in January providing revised language to address initial stakeholder feedback

- *Posted: November 14, 2025*
- *Next Step: tabled at ROS, referred issue to Dynamics Working Group (DWG) and System Protection Working Group (SPWG)*

NPRR1308

Related to NOGRR282, Large Electronic Load Ride-Through Requirements

Board Priority - 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: tabled at PRS, referred issue to ROS*

• **Key Takeaway**

Proposed timeline in place for a TAC recommendation regarding NOGRR282 for consideration at the June Board.

Large Load Issues: SB 6 Implementation

Net Metering Arrangements Involving a Large Load Co-Located with an Existing Generation Resource (PURA §39.169)

- PUC Project No. 58479, **expected February 2026**
- Rulemaking will codify the process for the Commission's evaluation of a net metering arrangement involving a large load and co-located with an existing Generation Resource along with the criteria used to evaluate the arrangement.

Large Load Forecasting Criteria (PURA §37.0561)

- PUC Project No. 58480, **expected February 2026**
- Rulemaking will establish criteria for ERCOT to include Large Loads in the forecasts that Transmission Service Providers (TSPs) submit to ERCOT for purposes of developing transmission planning and resource adequacy models and reports.
- Project will also establish criteria for TSPs to reasonably determine existing and forecasted load (see HB 5066 (88R)).
- ERCOT has developed a compliance plan to ensure the 2026 Regional Transmission Plan (RTP) complies with rule

Large Load Interconnection Standards (PURA §37.0561)

- PUC Project No. 58481, **expected August 2026**
- Rulemaking will establish standards for the interconnection of Large Load customers in ERCOT that support business development while minimizing the potential for stranded infrastructure costs and maintaining system reliability.

Reliability Service to Competitively Procure Demand Reductions from Large Loads (PURA §39.170)

- PUC Project No. 58482, **expected October 2026**
- Rulemaking will codify requirements for ERCOT to develop a new reliability service that competitively procures demand reductions from loads with a demand of ≥ 75 MWs to be deployed in the event of an anticipated emergency condition.

Evaluation of Transmission Cost Recovery (SB 6 Section 6 (a)-(c))

- PUC Project No. 58484, **expected December 2026**
- Project will evaluate whether the existing 4CP methodology continues to appropriately assign costs for transmission investment or if an alternative methodology would more appropriately assign the costs of providing access and codify any recommendations in a subsequent rulemaking.

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 issue 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: at the Board for consideration in February***

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 is working with a consultant to review customer participation and performance of existing DR programs to ensure compatibility, as well as identify and address any possible incongruities, inefficiencies, or program overlap. The review will help summarize the interplay and coordination points between all of Texas' DR programs, including those administered by market participants. ***ERCOT expects an update on this initial phase of work in April 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 issue to WMS and RMS***

ERCOT filed comments in January seeking to address stakeholder concerns that the lack of consideration for the RDR Program in the Reliability Deployment Price Adder (RDPA) will lead to an overall degradation of market prices and investment signals.

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: tabled at PRS***

ERCOT hosted a [workshop](#) in January to provide an overview of the SFA and review proposed changes.

Firm Fuel Supply Service (FFSS)

In January, the Commission adopted new 16 TAC §25.520, *relating to Firm Fuel Supply Service (FFSS)*. The rule codifies the criteria for a Resource to participate in the FFSS program and implementation requirements for ERCOT.

The rulemaking provided guidance for ERCOT to proceed with the development of Phase 3, including moving forward with NPPR1275 and an additional NPPR expected to codify the rule provisions.

NPPR1275

Expansion of Qualifying Pipeline Definition for Firm Fuel Supply Service in Phase 3

Amends the definition for FFSS Qualifying Pipeline as recommended by TAC in May 2023 under [NPPR 1169](#) so that additional Generation Resources that are capable of running on natural gas stored offsite would be eligible to provide FFSS.

- ***Posted: February 25, 2025***
- ***Next Step: tabled at PRS, referred issue to WMS***

- **Key Takeaway**

Phase 3 provisions are expected to be in place for the 2026-2027 winter season FFSS procurement period.

Reliability Procurement Process Improvements

Following recent experiences with Reliability Must-Run (RMR), Must-Run Alternative (MRA) and Contract for Capacity (C4C) proposals. ERCOT has reviewed lessons learned and identified potential process improvements.

NPRR1315

Changes to Process of Evaluating the Potential Needs for Additional Capacity

Adds notification requirements for ERCOT to notify the Commission when it determines that additional capacity is needed to prevent an imminent Emergency Condition and prior to entering into any contract for additional capacity.

Revision request would also extend the study horizon for evaluating and potentially contracting for capacity to prevent anticipated load shed events and expand the set of eligible Resources that can respond to the Requests for Proposal (RFPs) to include new Resources.

•Posted: December 19, 2025

•Next Step: tabled at PRS

NPRR1316

Implement an Annual ERCOT RFI Process to Gather Information Related to Retirement and Mothballing Plans of Select Resources

Adds an annual requirement for any Resource Entity that owns or operates a thermal generating unit that is identified by ERCOT to be at risk of being retired or mothballed to respond to a Request for Information (RFI) regarding public or non-public retirement or mothball plans, as well as likelihood of retirement or mothballing if there are no such public or non-public plans.

•Posted: December 19, 2025

•Next Step: tabled at PRS, referred issue to WMS

NPRR1319

Modifications to Seasonal Mothball Periods and Clarification to Evaluation Process

Expands the prohibition for placing a Generation Resource on a seasonal mothball status to include the winter season, (December, January, and February) and clarifies ERCOT's next steps after a proposal to be placed on seasonal mothball status has been evaluated.

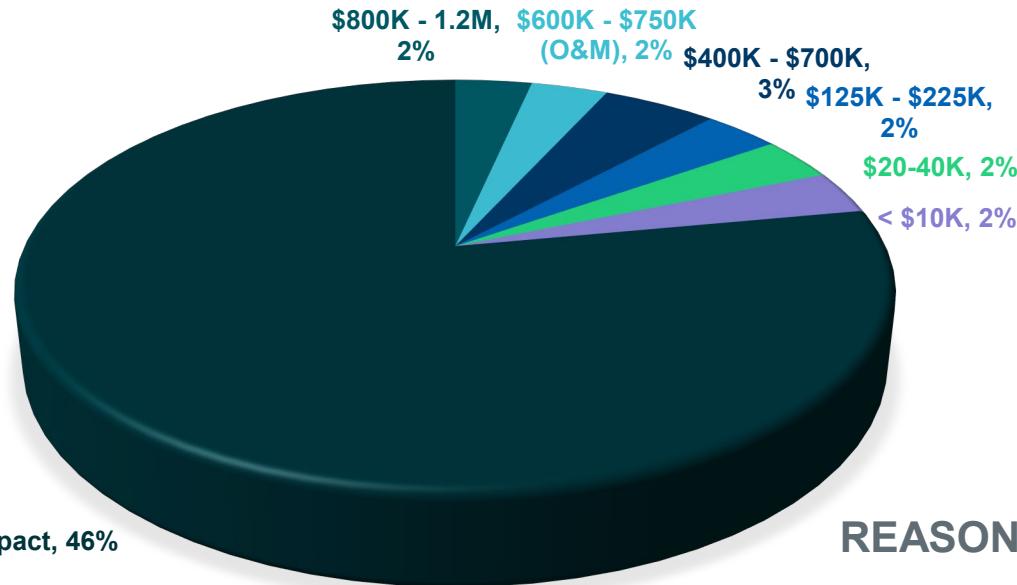
•Posted: December 29, 2025

•Next Step: tabled at PRS, referred issue to ROS and WMS

Appendix

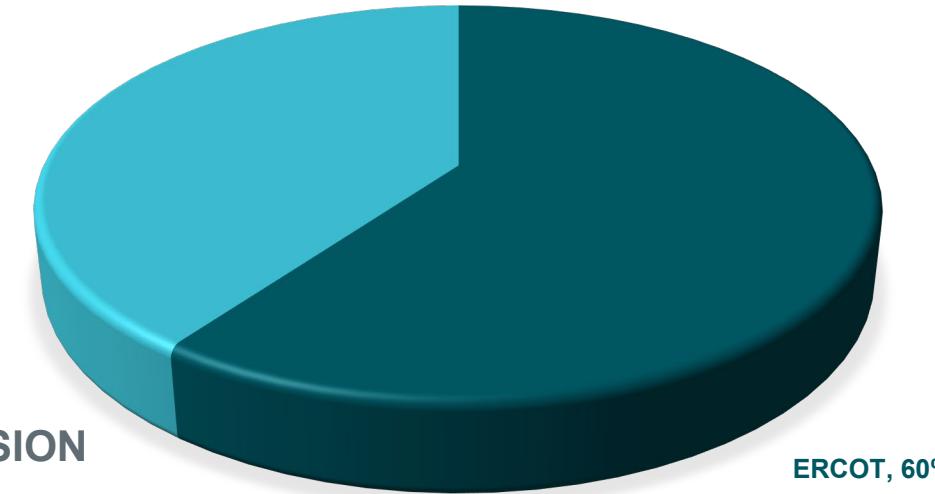
60 Revision Requests in Process

BUDGETARY IMPACT

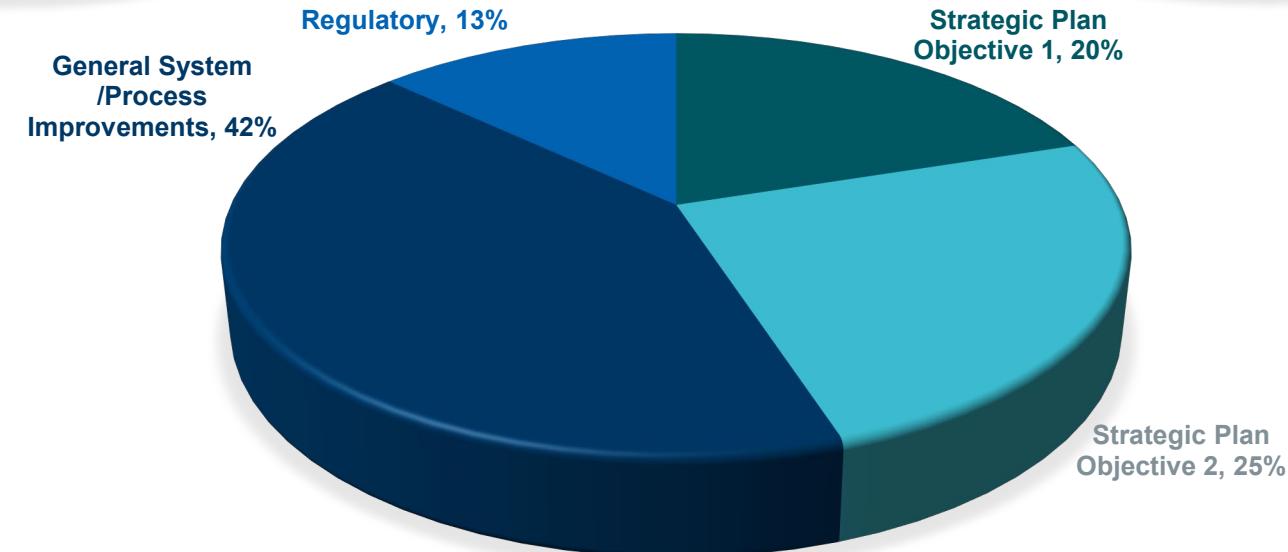


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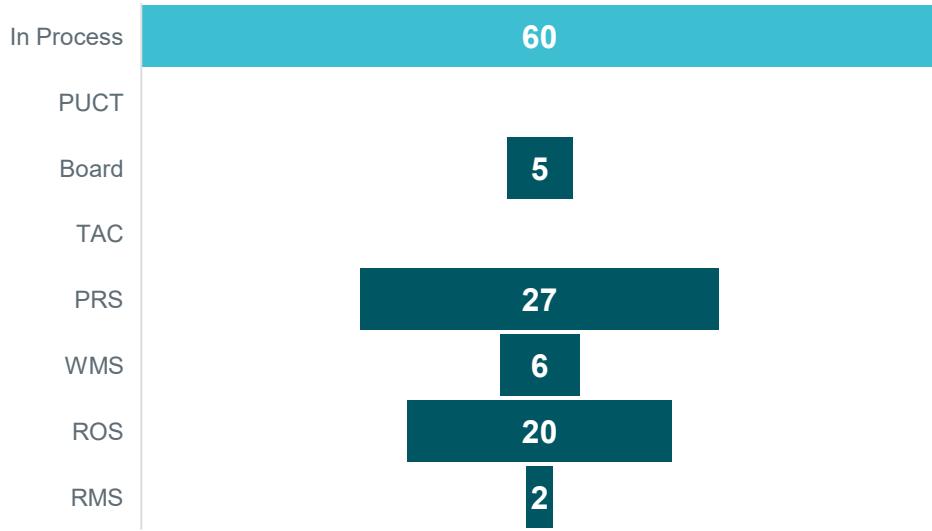


REASON FOR REVISION

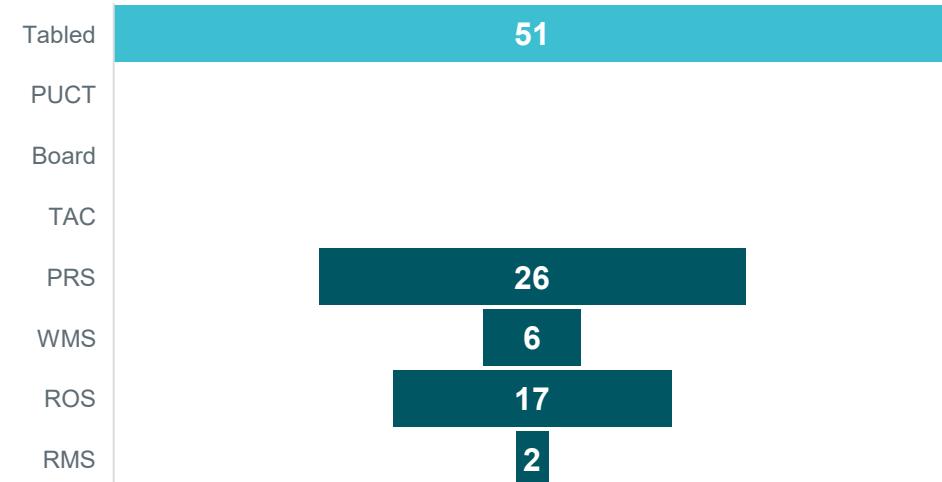


60 Revision Requests in Process

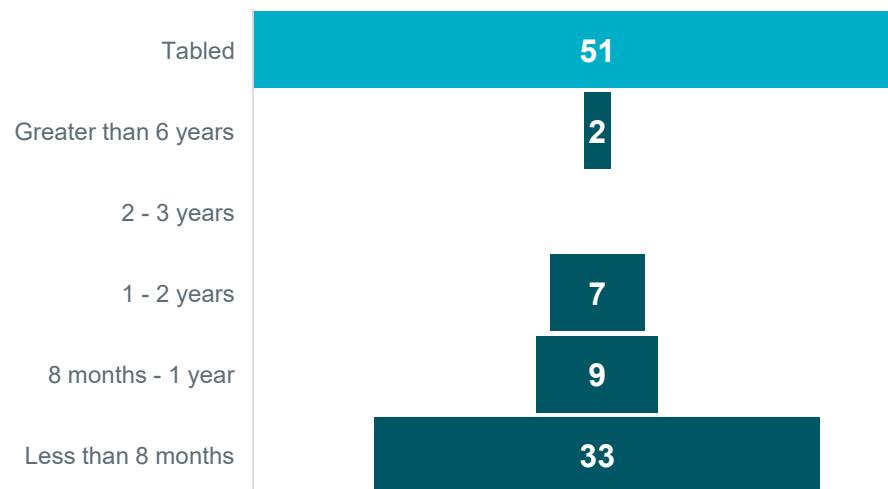
LOCATION OF REVISION REQUESTS



LOCATION OF TABLED REVISION REQUESTS



LENGTH TABLED



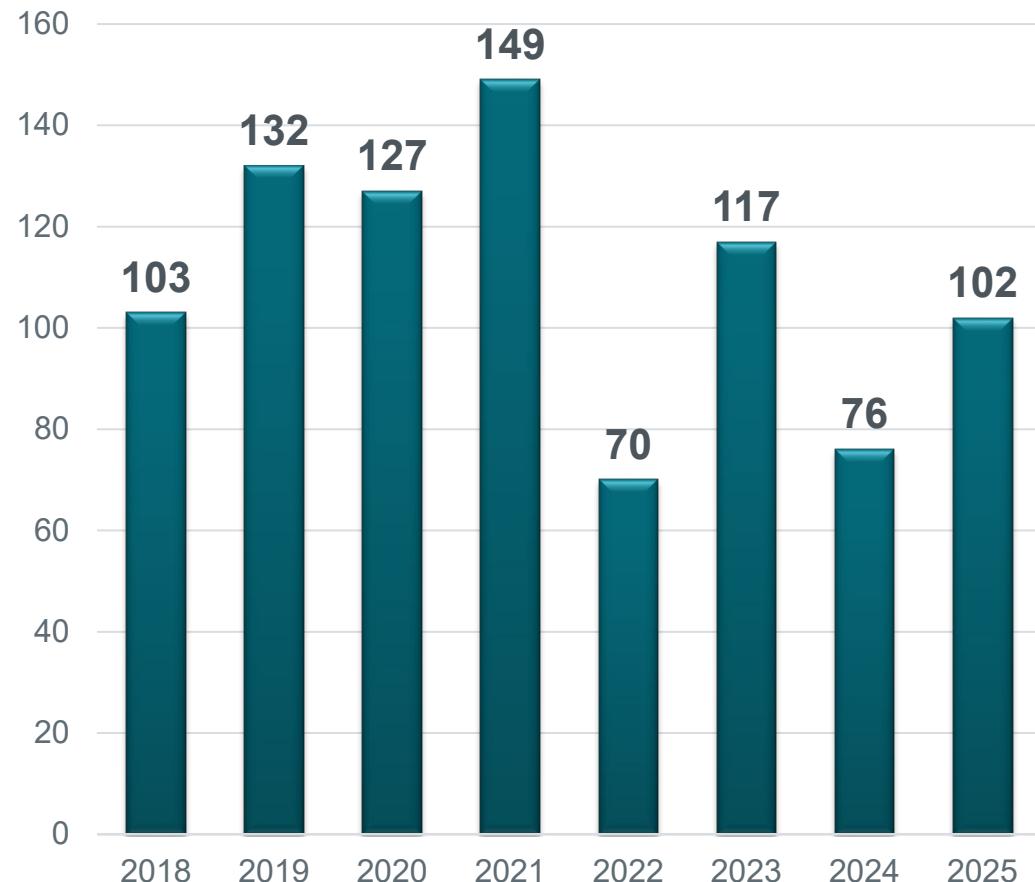
Aging Revision Requests

Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions, & Related PGRR073 [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. 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. ERCOT developing comments for consideration.
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

Aging Revision Requests

Revision Request	Length Tabled	Notes
NPRR1214, Reliability Deployment Price Adder Fix to Provide Locational Price Signals, Reduce Uplift and Risk [Joint Sponsors]	8 months – 1 year (5/14/25)	Tabled at PRS. PRS tabled at ERCOT's request as ERCOT Staff needed to focus internal resources on RTC+B go-live. ERCOT Staff is preparing a list of outstanding issues related to NPRR1214 for continued stakeholder discussion in the near future.
NPRR1278, Establishing Advanced Grid Support Service as an Ancillary Service [Engine/Jupiter]	8 months – 1 year (5/14/25)	Tabled at PRS. The sponsors originally proposed NPRR1278 as an alternative approach to the issue raised in NOGRR272, Advanced Grid Support Requirements for Inverter-Based ESRs, asking that stakeholders approve NPRR1278 instead of NOGRR272. NOGRR272 was approved by the PUCT in November 2025 and took effect on December 1, 2025. Additional discussion(s) are expected at WMS and ROS in 2026 regarding next step(s) for NPRR1278.
PGRR126, Related to NPRR1284, Guaranteed Reliability Load Process [Cholla]	8 months – 1 year (6/5/25)	Tabled at ROS. ROS assigned to PLWG/VPWG.

Statistics – New Revision Requests Submitted



New Revision Requests submitted since December Board

[PGRR136](#), Large Load Interconnection Study Scope Documentation
[COPMGRR053](#), Administrative Change for Commercial Operations Market Guide – NPPR1298
[SMOGRR035](#), Administrative Change for Settlement Metering Operating Guide – NPPR1298
[VCMRR046](#), Administrative Change for Verifiable Cost Manual – NPPR1298
[LPGRR075](#), Administrative Change for Load Profiling Guide – NPPR1298
[RMGRR185](#), Administrative Change for Retail Market Guide – NPPR1298
[RRGRR039](#), Administrative Change for Resource Registration Glossary – NPPR1298
[PGRR137](#), Administrative Change for Planning Guide – NPPR1298
[NOGRR285](#), Administrative Change for Nodal Operating Guides – NPPR1298
[NPPR1311](#), Correction to Real-Time Reliability Deployment Price Adders for Ancillary Services under Load Shed for RTC+B
[NPPR1312](#), Revisions to the Standard Form Agreement (SFA)
[PGRR138](#), Large Load Interconnection Study Review and Approval Process
[NPPR1313](#), Adjustment to the Calculation of the Initial Standby Cost for RMR Resources
[NPPR1314](#), Planning Guide Glossary Transition
[PGRR139](#), Related to NPPR1314, Planning Guide Glossary Transition
[VCMRR047](#), Related to NPPR1314, Planning Guide Glossary Transition
[NPPR1315](#), Changes to Process of Evaluating the Potential Needs for Additional Capacity
[NPPR1316](#), Implement an Annual ERCOT RFI Process to Gather Information Related to Retirement and Mothballing Plans of Select Resources
[NPPR1317](#), Related to NPPR1317, Creation of Non-Settled Generator (NSG) and Clarification of the Types, Usage, and Registration of Distributed Generation
[PGRR140](#), Related to NPPR1317, Creation of Non-Settled Generator (NSG) and Clarification of the Types, Usage, and Registration of Distributed Generation
[NPPR1318](#), Specific Exclusion of the Incentive Factor to ERCOT Approved Outside Attorney Fees and Approved Emissions Costs
[NPPR1319](#), Modifications to Seasonal Mothball Periods and Clarification to Evaluation Process
[PGRR141](#), Large Load Interconnection Study Reform for Substantiated Load

Acronyms

Acronym	Term
ASDC	Ancillary Services Demand Curve
C4C	Contract for Capacity
CMWG	Congestion Management Working Group
COPMGRR	Commercial Operations Market Guide Revision Request
DR	Distribution Generation Resource
DRRS	Dispatchable Reliability Reserve Service
DWG	Dynamics Working Group
EAC	Energy Attribute Credit
ESR	Energy Storage Resource
FFSS	Firm Fuel Supply Service
LEL	Large Electronic Load
LLWG	Large Load Working Group
LPGRR	Load Profiling Guide Revision Request
MRA	Must-Run Alternative
NOGRR	Nodal Operating Guide Revision Request
NOIE	Non Opt-In Entity
NPRR	Nodal Protocol Revision Request
NOGRR	Nodal Operating Guide Revision Request
NSG	Non-Settled Generator
OKR	Objectives and Key Results
PGRR	Planning Guide Revision Request
PLWG	Planning Working Group

Acronyms

Acronym	Term
PRS	Protocol Revision Subcommittee
QSE	Qualified Scheduling Entity
RDPA	Reliability Deployment Price Adder
RDR	Residential Demand Response
REP	Retail Electric Provider
RFI	Request for Information
RFP	Request for Proposal
RMGRR	Retail Market Guide Revision Request
RMR	Reliability Must Run
RMS	Retail Market Subcommittee
ROS	Reliability and Operations Working Group
RRGRR	Resource Registration Glossary Revision Request
RTC+B	Real-Time Co-optimization plus Batteries
RUC	Reliability Unit Commitment
SFA	Standard Form Agreement
SMOGRR	Settlement Metering Operating Guide Revision Request
SPWG	System Protection Working Group
TAC	Technical Advisory Committee
TSP	Transmission Service Provider
VCMRR	Verifiable Cost Manual Revision Request
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee