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| NPRR Number | [1309](https://www.ercot.com/mktrules/issues/NPRR1309) | NPRR Title | Board Priority - Dispatchable Reliability Reserve Service Ancillary Service |
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| Date | | January 30, 2026 | |
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| Submitter’s Information | | | |
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| Market Segment | | Not applicable | |

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| Comments |

The Texas Energy Buyers Alliance (TEBA) appreciates the opportunity to comment on the proposed Dispatchable Reliability Reserve Service (DRRS) framework. TEBA represents some of the state’s largest employers and energy customers who rely on the ERCOT market’s long-standing energy-only design. Consumers across the state benefit from Energy Storage Resources (ESRs), which they provide efficient, low-cost reliability support. Considering this, TEBA believes NPRR1309 should be revised to explicitly include ESRs.

TEBA believes that the proposed reliability service framework outlined in NPRR1309 is consistent with ERCOT’s foundational framework as an energy and Ancillary Services-only market structure. The proposed DRRS structured as a traditional Ancillary Service that is deployed in response to specific reliability needs, rather than a standing capacity construct.

Accordingly, TEBA requests that the proposal is revised to include ESRs among the Resource types eligible to provide DRRS. As currently drafted, ESRs are not explicitly identified as eligible participants. TEBA recommends that ERCOT allow all dispatchable Resources, including ERSs, to participate in DRRS so long as they are capable of meeting the applicable performance and operational requirements.

The statutory language underlying this proposal indicates that ESRs were intended to be included in the DRRS program. Specifically, the requirement that eligible dispatchable generation be capable of sustained operation for at least four hours appears to contemplate battery storage resources with those operational capabilities. Explicitly including ESRs would therefore be consistent with the appeared original legislative intent.

Including ESRs would strengthen the program by expanding the pool of flexible, fast-responding resources available to ERCOT during periods of system stress. Storage resources can provide rapid and reliable support to the grid, often at overall lower system cost. From a consumer perspective, broader eligibility increases the likelihood that reliability needs are met efficiently and at the lowest reasonable cost.

Overall, TEBA supports NPRR1309 with modification to explicitly allow Energy Storage resource to participate in DRRS.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.