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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 | | January 30, 2026 | |

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| Market Segment | Independent Generator |

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| Comments |

The Advanced Power Alliance (APA) and American Clean Power (ACP) appreciate the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1310 related to the implementation of the Dispatchable Reliability Reserve Service (DRRS) plus Energy Storage Resource (ESR) participation and Release Factor.

ERCOT has acknowledged that NPRR1310 is not based on the Aurora Energy Research study and this admission underscores why further progress on NPRR1310 must be contingent on a comprehensive ERCOT‑led analysis. The Aurora modeling presented in December was developed around a conceptual “DRRS AS+” construct that differs materially from the framework proposed in NPRR1310. ERCOT’s NPRR1310 diverges significantly from the assumptions, inputs, and design elements used in Aurora’s work. As a result, there is no existing study from ERCOT, Aurora, or any other source that evaluates the actual NPRR1310 design. Stakeholders therefore lack any quantitative foundation to assess the costs, benefits, or reliability impacts of the proposal.

ERCOT’s NPRR1310 seeks to implement several novel and consequential design elements, including a flat $10/MWh resource adequacy demand curve and a Release Factor that determines how much DRRS is available to meet resource adequacy needs. These features have significant implications for price formation, procurement costs, Reliability Unit Commitment (RUC) offset performance, and system reliability. Yet no analysis has been provided to demonstrate how these elements interact or what outcomes they produce. The absence of a cost‑benefit analysis is particularly concerning given that the $10/MWh floor would apply across all hours of the year. Without modeling, it is impossible to determine whether this value is appropriate or whether it creates unintended incentives that distort market outcomes in ways that undermine reliability. A flat, year‑round resource adequacy payment of this magnitude must be grounded in quantitative analysis, not assumption, particularly because it alters the balance between energy‑market revenues and resource adequacy payments.

Equally troubling is the complete lack of analysis comparing DRRS supplied by storage versus DRRS supplied solely by thermal dispatchable Resources. This is a critical omission. Storage is now a major and rapidly growing component of ERCOT’s resource mix, and its operational characteristics including fast ramping, high controllability, and predictable performance are directly relevant to DRRS. Without modeling, stakeholders cannot assess whether a thermal‑only DRRS portfolio would be more expensive, less flexible, or less reliable. Given the scale of storage deployment in ERCOT, the resource‑mix implications of NPRR1310 must be explicitly analyzed before the design can be considered complete. Failing to analyze these implications represents a fundamental analytical gap.

The Independent Market Monitor (IMM) has stated that NPRR1310 is impossible to evaluate without quantitative analysis. The IMM emphasized that the $10/MWh floor appears arbitrary without modeling, that the Aurora study is not applicable, and that stakeholders “cannot make sense” of NPRR1310 in its current form. When the IMM raises concerns of this magnitude, the Technical Advisory Committee (TAC) and Protocol Revision Subcommittee (PRS) have a responsibility to ensure that ERCOT provides the analytical foundation necessary for informed decision‑making. ERCOT has already committed to bringing back refined analysis, TAC and PRS should hold ERCOT to that commitment and make clear that NPRR1310 cannot advance without it.

Advancing NPRR1310 without modeling also creates significant governance risk. The ERCOT Board expects a complete proposal in June, supported by quantitative justification and a clear explanation of cost impacts. If TAC or PRS move NPRR1310 forward without analysis, then the Board is faced with having to make a less informed decision or defer the proposal. A study protects the integrity of the process and ensures that the Board receives a proposal that meets its expectations.

For these reasons, the responsible and procedurally sound path forward is for TAC or PRS to direct ERCOT to complete a full quantitative study of NPRR1310 including cost impacts, resource‑mix impacts, and price formation effects, before any further action is taken on the NPRR. This approach does not delay NPRR1309, which can continue on the accelerated timeline. It simply ensures that NPRR1310 is supported by the analytical rigor required for a market design of this scale and importance, particularly given that ERCOT is not recommending a cap or implementing any Performance Credit Mechanism (PCM)-type HB 1500 guardrails that the Legislature placed in statute.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Protocol Language |

None at this time.