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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 | | February 2, 2026 | |
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| Market Segment | | Independent Generator / Independent Power Marketer | |

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| Comments |

Texas Competitive Power Advocates (TCPA) submits these comments regarding Nodal Protocol Revision Request (NPRR) 1310 in response to comments filed on January 28, 2026, by other stakeholders, namely the Lower Colorado River Authority (LCRA) and Texas Industrial Energy Consumers (TIEC). Generally, TCPA supports LCRA’s position that resource adequacy tools are needed now and NPRR1310 could be developed as such a tool, and disagrees with TIEC to the extent it is suggesting resource adequacy solutions are premature and unnecessary.[[1]](#footnote-1),[[2]](#footnote-2)

**ERCOT urgently needs a resource adequacy solution.**

As LCRA noted in their comments, ERCOT needs a comprehensive resource adequacy solution and the design of NPRR1310 could be modified to be a resource adequacy tool given that “numerous resource adequacy studies have indicated that ERCOT lacks sufficient long-duration capacity to meet the reliability standard in the absence of *significant* market design improvements.”[[3]](#footnote-3) These assertions are supported by the recent Assessment of Resource Adequacy Needs in ERCOT and Impact of Market Design Changes in which Aurora Energy Research concluded that under the status quo ERCOT could face load-shedding during extreme weather conditions by 2030.[[4]](#footnote-4) Aurora’s analysis showed that when compared with Dispatchable Reliability Reserve Service Ancillary Service (DRRS) implementation and Operating Reserve Demand Curve (ORDC) changes, the Dispatchable Reliability Reserve Service Ancillary Service Plus (DRRS+) concept contained in NPRR1310 “provides the largest reliability improvement at the lowest system cost.”[[5]](#footnote-5)

While TCPA is still evaluating DRRS+, TCPA has long recognized the need for a resource adequacy tool in ERCOT. For example, TCPA indicated in 2021 that any number of options before the Public Utility Commission of Texas (PUCT) could achieve resource adequacy. Once the PUCT chose the Performance Credit Mechanism (PCM), TCPA supported it because the PCM would have created “a competitive solution for the most important aspect of reliability in the ERCOT region – resource adequacy.”[[6]](#footnote-6) Although the PCM was ultimately shelved by the PUCT after the imposition of a cost cap, the necessity for a resource adequacy solution in ERCOT remains. In fact, the 2025 Long-Term Reliability Assessment by the North American Electric Reliability Corporation (NERC) found ERCOT to be at High Risk as “planned resources as of July 2025 would result in energy shortfalls that exceed resource adequacy targets or baseline criteria for unserved energy or loss of load.”[[7]](#footnote-7) TCPA currently remains agnostic on whether the solution is PCM, DRRS+, or something else that is based on sound economic principles to support resource adequacy, but TCPA urges ERCOT to continue working diligently with stakeholders to develop a resource adequacy tool that sends the market signals needed to meet the expected demand growth.

**Delaying development of a resource adequacy solution puts the grid at risk.**

Conversely, TCPA is concerned about TIEC’s suggestion that ERCOT should postpone consideration of potential market design changes needed to meet reliability. Although it remains to be seen if DRRS+ may be an appropriate resource adequacy mechanism tool, Aurora found that DRRS on its own will not provide a significant reliability benefit: “DRRS Ancillary Service Plus provides the largest reliability improvement at the lowest system cost. An Extended ORDC provides less reliability benefit at a higher cost, while **DRRS Ancillary Service offers comparatively limited improvement.”[[8]](#footnote-8)**

As discussed above, the available evidence strongly suggests ERCOT will need more long-term dispatchable generation by 2030 and beyond, and policymakers have made it clear through the Texas Energy Fund (TEF) that they would like to see that generation as soon as possible. Therefore, TCPA believes there is value in continuing to examine DRRS+ and market-based mechanisms that could send the signals needed to ensure the reliability standard is met by dispatchable resources with seasonally appropriate attributes, including the ability “to ensure winter performance *for several days*.”[[9]](#footnote-9)

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None

1. *Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor,*

   NPRR1310, Comments by LCRA (January 28, 2026), *available at* <https://www.ercot.com/files/docs/2026/01/28/1310NPRR-06-LCRA-Comments-012826.docx> [↑](#footnote-ref-1)
2. *Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor,*

   NPRR1310, Comments by TIEC (January 28, 2026), *available at* https://www.ercot.com/files/docs/2026/01/28/1310NPRR-08-TIEC-Comments-012826.docx [↑](#footnote-ref-2)
3. *Dispatchable Reliability Reserve Service Plus Energy Storage Resource Participation and Release Factor,*

   NPRR1310, Comments by LCRA (January 28, 2026), Page 1, *available at* <https://www.ercot.com/files/docs/2026/01/28/1310NPRR-06-LCRA-Comments-012826.docx> [↑](#footnote-ref-3)
4. Assessment of Resource Adequacy Needs in ERCOT and Impact of Market Design Changes, Aurora Energy Research (November 10, 2025), *available at* <https://www.ercot.com/files/docs/2025/12/10/Aurora-Assessment-of-Resource-Adequacy-Needs-in-ERCOT-Region-and-Impact-of-Market-Design-Changes-2025.11.10-.pdf> [↑](#footnote-ref-4)
5. Assessment of Resource Adequacy Needs in ERCOT and Impact of Market Design Changes, Aurora Energy Research (November 10, 2025), Pag 3, *available at* <https://www.ercot.com/files/docs/2025/12/10/Aurora-Assessment-of-Resource-Adequacy-Needs-in-ERCOT-Region-and-Impact-of-Market-Design-Changes-2025.11.10-.pdf> [↑](#footnote-ref-5)
6. *Performance Credit Mechanism (PCM),* Project 55000, Texas Competitive Power Advocates’s Responses to Staff’s Questions Regarding the Performance Credit Mechanism (June 20, 2024), Page 1, *available at* <https://interchange.puc.texas.gov/Documents/55000_30_1404503.PDF> [↑](#footnote-ref-6)
7. 2025 Long-Term Reliability Assessment, North American Electric Reliability Corporation (January 29, 2026), Page 6, *available at* <https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf> [↑](#footnote-ref-7)
8. Assessment of Resource Adequacy Needs in ERCOT and Impact of Market Design Changes, Aurora Energy Research (November 10, 2025), Page 3, *available at* <https://www.ercot.com/files/docs/2025/12/10/Aurora-Assessment-of-Resource-Adequacy-Needs-in-ERCOT-Region-and-Impact-of-Market-Design-Changes-2025.11.10-.pdf> [↑](#footnote-ref-8)
9. 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-9)