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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 4, 2026 | |
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| Submitter’s Information | | | |
| Name | | Cyrus Reed | |
| E-mail Address | | [Cyrus.reed@sierraclub.org](mailto:Cyrus.reed@sierraclub.org) | |
| Company | | Sierra Club, Lone Star Chapter | |
| Phone Number | | 512-888-9411 | |
| Cell Number | | 512-740-4086 | |
| Market Segment | | Small Commercial Consumer | |

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| Comments |

The Sierra Club files these comments in response to ERCOT’s November 20th, 2025 filing of Nodal Protocol Revision Request (NPRR) 1310. While the Sierra Club supports the need and requirement for ERCOT to add a new four-hour Ancillary Service that is separate from Non-Spinning Reserve (Non-Spin), we agree with recent comments filed by TIEC, APA and ACP, TEBA and the IMM that NPRR1310 should not be adopted. While we do appreciate that NPRR1310 does contemplate storage - at some point - to participate in the service, this should be addressed in NPRR1309 as we have suggested in comments filed there.

DRRS+ is inconsistent with ERCOT’s energy-only market principles that have been in place for several decades. The Texas energy-only market is built to allow loads including both transmission-level Customers, Retail Electric Providers (REPs), and Non-Opt-In Entities (NOIEs) to manage risk through bilateral contracting, financial hedging, and operational response as energy and ancillary prices rise and fall as scarcity conditions arise. This design is efficient and helps customers manage prices. NPRR1310 moves us away from this model and introduces significant risk and costs for consumers.

In essence, DRRS+ would represent a shift in costs from consumers to generators through uplift or administrative charges assigned to all Load Service Entities (LSEs) that cannot be hedged or managed.

In addition, in adopting the Public Utility Commission of Texas (PUCT) sunset bill in 2023, the Legislature both directed the PUCT and ERCOT to add an Ancillary Service - Dispatchable Reliability Reserve Service (DRRS) - and explore other reliability tools However, those additional tools came with strict guardrails and a required study process. As TIEC points out in their comments, that study process is ongoing to determine if any additional tools are required, and DRRS + as contemplated under NPRR1310 would put the horse before the cart

The Sierra Club believes that NPRR1310 should be tabled If the reliability study process required by HB 1500 determines that additional tools are needed, and that it is the best tool to address those reliability needs, it could be considered in the future. At this point, we do not see evidence that a tool like NPPR1310 is needed, and it should be left tabled.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.