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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 | | | |
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| Market Segment | | Industrial Consumer | |

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| Comments |

TXOGA appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1310 and its market implications.

TXOGA strongly opposes continued consideration of NPRR1310 and requests that ERCOT withdraw this NPRR to allow expedited stakeholder review and approval of NPRR1309, Board Priority - Dispatchable Reliability Reserve Service Ancillary Service. Considering NPRR1310 at this time wastes stakeholder and ERCOT resources to design a product that will hurt reliability, conflicts with the statutory requirements and legislative history of Dispatchable Reliability Reserve Service (DRRS), and could delay the implementation of NPRR1309.

TXOGA objects to both the establishment of a payment mechanism to certain Resources outside of any operational reliability need, and the coopting of the Ancillary Service program (which as designed is intended to procure the minimum level of reserves in Real-Time operations to maintain grid reliability) to serve as the vehicle for these out-of-market payments.

TXOGA believes that the likely outcome of any out-of-market payment mechanism such as contemplated in DRRS+ is a dilution of the incentive for Resources to be available during infrequent and unpredictable grid scarcity events, which has been the defining strength of the ERCOT wholesale electricity market for 25 years.

Following several years of stakeholder discussions questioning the efficiency of ERCOT’s Ancillary Service Methodology, TXOGA is opposed to proposed Protocol language that would allow ERCOT to extend arbitrary levels of Ancillary Service revenues to units that are not meeting any quantified Real-Time operational need, during periods in which there are no grid reliability concerns, and providing this revenue to megawatts of Resources that are already being compensated for energy or another Ancillary Service. These arbitrary out-of-market payments seem specifically inconsistent with the requirement in HB1500 (88th Regular Session) that procurement of DRRS must “…reduce the amount of reliability unit commitment by the amount of dispatchable reliability reserve services procured under this section.” [HB1500 Section 22].

TXOGA would remind ERCOT and stakeholders of the legislative history of DRRS.

The Texas Legislature included DRRS, which was not intended to be a resource adequacy tool, as a requirement in HB1500 (88[R]) because there was broad stakeholder consensus (including consumers) that the extensive use of Reliability Unit Commitment (RUC) by ERCOT to maintain real-time reliability was a clear indication of a gap in the wholesale market design. A DRRS-like product was recommended by the ERCOT Independent Market Monitor (IMM).

The Texas Legislature included an aggressive deadline for completion of DRRS in HB1500 (December 1, 2024) showing the clear legislative intent was that DRRS be implemented first, and then other market design changes could be considered after the market impacts of DRRS had been determined.

With NPRR1310, ERCOT would further complicate and delay DRRS implementation by adding a type of capacity payment to the DRRS proposal that could be extended broadly to some or even all Resources that meet specific DRRS qualification requirements. Although ERCOT has estimated the same implementation time for both NPRR1309 (DRRS generally as intended by HB1500) and NPRR1310, it is difficult to see how the NPRR1310 proposal, which is likely to face extended stakeholder discussions, followed by Commission review and possible remand, and even possible appellate court review, could be implemented in the same timeline as a proposal that is specifically required in current statute.

TXOGA asks that ERCOT withdraw NPRR1310 and instead focus its efforts, and the efforts of stakeholders, on the clear legislative language of HB1500 requiring them to expeditiously implement a 2-hour advance reserve product.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.