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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 | | Independent Retail Electric Provider (IREP) | |

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| Comments |

The Texas REP Coalition appreciates this opportunity to comment on Nodal Protocol Revision Request (NPRR) 1310 ahead of the February 4, 2026, TAC Dispatchable Reliability Reserve Service (DRRS) Workshop 2. The Texas REP Coalition supports the adoption of DRRS as set forth in statute.

An important part of the consideration of the various options for design parameters associated with this new Ancillary Service is the ultimate cost of that service that will be assigned to each Load Serving Entity (LSE). The Texas REP Coalition notes that as the parameters for the design of this Ancillary Service are yet unknown, the cost of DRRS+ is also unknown and could vary widely based on different assumptions and parameters. Further, the timing of implementation and the approximate date on which the features of the Ancillary Service Obligation for DRRS plus could begin remain unknown. Given the current regulatory uncertainties surrounding this product, customers should not be in a position of having projected costs for this product included in retail pricing until the implementation timeline and parameters (including cost) of this service are better understood. Going forward, it may be beneficial to recognize this regulatory uncertainty and present potential cost impacts associated with each proposal.

In addition, the proposed “release factor” currently in the design of this service, presents additional challenges making this a cost that cannot be known or adequately hedged in a manner to allow reasonable price certainty for customers. The regulatory uncertainty and volatility of this current design present particular challenges.

The Texas REP Coalition requests that clear language be added to this NPRR, indicating a date certain under which the implementation of any additional Ancillary Service Obligation beyond the design contemplated in NPRR 1309, Board Priority - Dispatchable Reliability Reserve Service Ancillary Service, might begin.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.