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| NPRR Number | [**1264**](https://www.ercot.com/mktrules/issues/NPRR1264) | NPRR Title | Creation of a New Energy Attribute Certificate Program |
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| Date | | April 2, 2025 | |
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| Submitter’s Information | | | |
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| Market Segment | | Independent Generator | |

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| Comments |

Pattern supports this Nodal Protocol Revision Request (NPRR) and agrees with the many commenters observing that NPRR1264 would enable an increasingly important feature for the ERCOT wholesale power market. A voluntary Energy Attribute Certificate (EAC) accreditation platform with hourly matching, as contemplated in NPRR1264, would allow multiple resource types to capture the value of positive externalities at market-determined rates. Such a program could enable Texas generators to meet nationwide voluntary hourly Renewable Energy Credit (REC) demand and unlock additional revenue streams.

Pattern further appreciates the author’s innovative approach to allow for third party administration of the EAC program as this approach should enable program operating costs to be borne by program participants, rather than ERCOT System Administration Fee payers. As noted by the author, ERCOT’s role in creating the EAC program and supplying the verified data for earned EACs is appropriate under House Bill 1500’s permissive structure to allow for continued voluntary retirement of certain RECs.

Further, Pattern asserts such activity by ERCOT is appropriate under its statutory obligation in PURA 39.151(4) to “ensure that electricity production and delivery are accurately accounted for among the generators and wholesale buyers and sellers in the region.” While energy attributes differ from physical energy production, these attributes are increasingly integral components of Power Purchase Agreements (PPAs) or requirements for various current and proposed state and federal mandates.

Finally, Pattern supports Vistra’s March 11, 2025 comments recommending a 10-year useful life for EACs.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None