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| NPRR Number | [1309](https://www.ercot.com/mktrules/issues/NPRR1309) | NPRR Title | Board Priority - Dispatchable Reliability Reserve Service Ancillary Service |
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| Date | | February 2, 2026 | |
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| Market Segment | | Independent Generator / Independent Power Marketer | |

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| Comments |

TCPA submits these comments in support of the comments made by the Lower Colorado River Authority (LCRA) on January 28, 2026.[[1]](#footnote-1) TCPA recognizes the need for ERCOT to have additional operational flexibility and welcomes any reduction in the use of non-competitive dispatch through the Reliability Unit Commitment (RUC) process. However, as Aurora Energy Research noted in the Assessment of Resource Adequacy Need in ERCOT and Impact of Market Design Changes, “DRRS Ancillary Service (DRRS) offers comparatively limited [reliability] improvement,” especially under extreme weather conditions.[[2]](#footnote-2)

Numerous studies, including the Aurora study and the recent 2025 Long-Term Reliability Assessment by the North American Electric Reliability Corporation (NERC) have found ERCOT lacks the dispatchable capacity needed for resource adequacy, citing concerns associated with large amounts of load growth and forecasting challenges.[[3]](#footnote-3) “Unlike other markets in the US with a capacity market or other mechanism to ensure adequate supply, ERCOT relies only on wholesale and ancillary service markets price signals for resource adequacy.”[[4]](#footnote-4) Unfortunately, Aurora’s analysis does not suggest DRRS will send the signals necessary to invest in long-duration dispatchable generation. Therefore, TCPA echoes LCRA’s call for ERCOT to continue its work with stakeholders through the 2026 reliability assessment process (Project No. 58777) to develop new market design options that are sufficient to meet the PUC-approved reliability standard.

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| Revised Cover Page Language |

None at this time.

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| Revised Proposed Protocol Language |

None at this time.

1. *Board Priority - Dispatchable Reliability Reserve Service Ancillary Service,*

   NPRR1309, Comments by LCRA (January 28, 2026), *available at* <https://www.ercot.com/files/docs/2026/01/28/1309NPRR-06-LCRA-Comments-012826.docx> [↑](#footnote-ref-1)
2. 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-2)
3. 2025 Long-Term Reliability Assessment, North American Electric Reliability Corporation (January 29, 2026), *available at* <https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf> [↑](#footnote-ref-3)
4. 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-4)