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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 4, 2026 | |
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| Submitter’s Information | | | |
| Name | | Catherine Webking | |
| E-mail Address | | [cwebking@spencerfane.com](mailto:cwebking@spencerfane.com) | |
| Company | | Spencer Fane, on behalf of the Texas REP Coalition | |
| Phone Number | | 512-575-6060 | |
| Cell Number | | 512-751-9151 | |
| 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) 1309 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 as an Ancillary Service is also unknown. Further, the timing of implementation and the approximate date on which the Ancillary Service Obligation for DRRS will begin remain unknown. While NPRR1309 may be approved by the ERCOT Board this summer, the NPRR has an estimated project implementation duration of 20 to 30 months. 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 the actual costs of the product are better known. Going forward, it may be beneficial to recognize this regulatory uncertainty and present potential cost impacts associated with each proposal.

The Texas REP Coalition requests that clear language be added to this NPRR, indicating a date certain under which the implementation of the Ancillary Service Obligation will begin and the quantities of DRRS to be procured will be known or knowable for stakeholders.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.