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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 | | January 30, 2026 | |
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| Submitter’s Information | | | |
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| Market Segment | | Not applicable | |

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| Comments |

The Texas Energy Buyers Alliance (TEBA) appreciates the opportunity to comment on Nodal Protocol Revision Request (NPRR) 1310 and the proposed Dispatchable Reliability Reserve Service “Plus” (“DRRS+”) construct. TEBA represents some of the state’s largest employers and energy customers who rely on the ERCOT market’s long-standing energy-only design to deliver reliability at the lowest reasonable cost. From that perspective, TEBA believes NPRR1310 should not be adopted.

At a high level, DRRS+ is inconsistent with the foundational market design principles that have guided ERCOT for decades. The Texas energy-only market is built around transparent, scarcity-driven price signals that allow participants to manage risk through bilateral contracting, financial hedging, and operational response. When prices are high, consumers can reduce load, self-supply, or rely on contracted resources. When prices are low, consumers benefit directly. This design aligns cost causation, risk, and reward in a way that promotes efficiency and innovation.

DRRS+ moves ERCOT away from this framework by introducing a new, administratively determined payment stream that is largely disconnected from Real-Time supply and demand conditions. While framed as an Ancillary Service, the proposed construct functions as a standing payment for availability rather than a short-term reliability tool. This structure incentivizes overcommitment, weakens Real-Time price signals, and results in excess capacity remaining On-Line.

From a consumer perspective, the most significant concern with DRRS+ is cost. Payments under this program would be recovered from Load through uplift or administrative charges that are assigned to each Load Serving Entity (LSE). This won’t allow retail companies to reduce cost for their customers through contracting or active risk management. Unlike energy prices, these costs are not hedgeable. Even buyers who actively manage exposure would be required to pay these charges regardless of behavior or market conditions.

Importantly, ERCOT already has mechanisms to compensate resources, including batteries and other flexible technologies, directly through participation in the energy and Ancillary Services market. These mechanisms preserve market transparency, allow prices to reflect system conditions, and enable consumers to manage costs through existing tools. DRRS+ does not fill a demonstrated gap in market functionality. Instead, it layers additional costs on top of a system that already provides multiple pathways for resources to earn revenue when they provide value.

Overall, TEBA believes NPRR1310 would move ERCOT away from a market-based, consumer-focused design toward a more administratively drive construct with higher costs. TEBA therefore recommends that stakeholders should reject NPRR1310 and that ERCOT continue to focus on solutions that strengthen the existing energy-only market framework.

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| Revised Cover Page Language |

None.

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| Revised Proposed Protocol Language |

None.