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| NPRR Number | [1221](https://www.ercot.com/mktrules/issues/NPRR1221) | NPRR Title | Related to NOGRR262, Provisions for Operator‑Controlled Manual Load Shed |
| Date of Decision | August 28, 2024 |
| Action | Recommended Approval |
| Timeline | Normal |
| Estimated Impacts | Cost/Budgetary: None Project Duration: No project required |
| Proposed Effective Date | Upon implementation of Nodal Operating Guide Revision Request (NOGRR) 262, Provisions for Operator-Controlled Manual Load Shed |
| Priority and Rank Assigned | Not applicable |
| Nodal Protocol Sections Requiring Revision  | 6.5.9.4.2, EEA Levels |
| Related Documents Requiring Revision/Related Revision Requests | NOGRR262Nodal Operating Guide Section 4.5.3.3, EEA Levels (Alignment NOGRR) |
| Revision Description | This Nodal Protocol Revision Request (NPRR) aligns provisions regarding manual and automatic firm Load shed; clarifies the proper use and interplay of Under-Voltage Load Shed (UVLS), Under-Frequency Load Shed (UFLS), and manual Load shed; and addresses reliability concerns ERCOT has identified regarding the extent of Transmission Operators’ (TOs’) manual Load shed capabilities. |
| Reason for Revision |  [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 1 – Be an industry leader for grid reliability and resilience [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 2 - Enhance the ERCOT region’s economic competitiveness with respect to trends in wholesale power rates and retail electricity prices to consumers [Strategic Plan](https://www.ercot.com/files/docs/2023/08/25/ERCOT-Strategic-Plan-2024-2028.pdf) Objective 3 - Advance ERCOT, Inc. as an independent leading industry expert and an employer of choice by fostering innovation, investing in our people, and emphasizing the importance of our mission General system and/or process improvement(s) Regulatory requirements ERCOT Board/PUCT Directive*(please select ONLY ONE – if more than one apply, please select the ONE that is most relevant)* |
| Justification of Reason for Revision and Market Impacts | This NPRR aligns the Nodal Protocols with NOGRR262, which adds language that addresses manual Load shed during an Energy Emergency Alert (EEA).This NPRR maintains existing provisions that allow ERCOT TOs to utilize Loads on UFLS and UVLS circuits to augment manual Load shed capabilities while continuing to comply with UFLS obligations and modifies language to align with North American Electric Reliability Corporation (NERC) Reliability Standards EOP-011-3, Emergency Operations, and EOP-011-4, Emergency Operations. This NPRR also adds provisions that allow a TO to go below its 25% UFLS Load shed obligation when all Load that has been identified as being capable of manual Load shed has been shed.NERC Reliability Standards EOP-011-3 and EOP-011-4 require ERCOT, as a NERC-registered balancing authority, to develop, maintain, and implement operating plan(s) to mitigate capacity emergencies and energy emergencies within its balancing authority area. This NPRR addresses the requirements in EOP-011-3 and EOP-011-4 that the plan(s) must include provisions for TOs to implement operator-controlled manual Load shed during an emergency that accounts for 1) provisions for manual Load shed capable of being implemented in a timeframe adequate for mitigating the emergency; 2) provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that serve designated critical loads; 3) provisions to minimize the overlap of circuits that are designated for manual Load shed and circuits that are utilized for UFLS or UVLS; and 4) provisions for limiting the utilization of UFLS or UVLS circuits for manual Load shed to situations where warranted by system conditions. |
| PRS Decision | On 4/5/24, PRS voted unanimously to table NPRR1221 and refer the issue to ROS. All Market Segments participated in the vote.On 7/18/24, PRS voted unanimously to recommend approval of NPRR1221 as submitted. All Market Segments participated in the vote.On 8/8/24, PRS voted unanimously to endorse and forward to TAC the 7/18/24 PRS Report and 3/20/24 Impact Analysis for NPRR1221. All Market Segments participated in the vote. |
| Summary of PRS Discussion | On 4/5/24, ERCOT Staff presented NPRR1221; participants requested further review by ROS.On 7/18/24, participants noted the 7/11/24 ROS comments.On 8/8/24, participants reviewed the 3/20/24 Impact Analysis. |
| TAC Decision | On 8/28/24, TAC voted unanimously to recommend approval of NPRR1221 as recommended by PRS in the 8/8/24 PRS Report. All Market Segments participated in the vote. |
| Summary of TAC Discussion | On 8/28/24, there was no additional discussion beyond TAC review of the items below. |
| TAC Review/Justification of Recommendation |  Revision Request ties to Reason for Revision as explained in Justification  Impact Analysis reviewed and impacts are justified as explained in Justification Opinions were reviewed and discussed Comments were reviewed and discussed (if applicable) Other: (explain) |

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| **Opinions** |
| **Credit Review** | ERCOT Credit Staff and the Credit Finance Sub Group (CFSG) have reviewed NPRR1221 and do not believe that it requires changes to credit monitoring activity or the calculation of liability. |
| **Independent Market Monitor Opinion** | The IMM has no opinion on NPRR1221. |
| **ERCOT Opinion** | ERCOT supports approval of NPRR1221 |
| **ERCOT Market Impact Statement** | ERCOT Staff has reviewed NPRR1221 and believes it provides a positive market impact by ensuring the required alignment between ERCOT and TOs during an EEA Level 3 Load shed event, and ensuring ERCOT and TOs understand their respective responsibilities during an EEA Level 3 firm Load shed event. |

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| Market Segment | Not applicable |

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| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| ROS 040424 | Requested PRS table NPRR1221 for further review by the Operations Working Group (OWG)  |
| ROS 050224 | Requested PRS continue to table NPRR1221 for further review by OWG  |
| ROS 071124 | Endorsed NPRR1221 as submitted |

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| Market Rules Notes |

Please note the following NPRR(s) also propose revisions to the following section(s):

* NPRR1217, Remove Verbal Dispatch Instruction (VDI) Requirement for Deployment and Recall of Load Resources and Emergency Response Service (ERS) Resources
	+ Section 6.5.9.4.2

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| Proposed Protocol Language Revision |

6.5.9.4.2 EEA Levels

(1) ERCOT will declare an EEA Level 1 when PRC falls below 2,500 MW and is not projected to be recovered above 2,500 MW within 30 minutes without the use of the following actions that are prescribed for EEA Level 1:

(a) ERCOT shall take the following steps to maintain steady state system frequency near 60 Hz and maintain PRC above 2,000 MW:

(i) Request available Generation Resources that can perform within the expected timeframe of the emergency to come On-Line by initiating manual HRUC or through Dispatch Instructions;

(ii) Use available DC Tie import capacity that is not already being used;

(iii) Issue a Dispatch Instruction for Resources to remain On-Line which, before start of emergency, were scheduled to come Off-Line; and

(iv) Instruct QSEs to deploy undeployed ERS-10 and ERS-30.

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| [NPRR1010: Insert paragraph (v) below upon system implementation of the Real-Time Co-Optimization (RTC) project:](v) At ERCOT’s discretion, manually deploy, through ICCP, available RRS and ECRS capacity from Generation Resources having a Resource Status of ONSC and awarded RRS or ECRS. |

(b) QSEs shall:

(i) Ensure COPs, telemetered status, and telemetered HSLs are updated and reflect all Resource delays and limitations; and

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| [NPRR1010: Replace paragraph (i) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:](i) Ensure COPs, telemetered status, telemetered HSLs, Normal Ramp Rates, Emergency Ramp Rates, and Ancillary Service capabilities are updated and reflect all Resource delays and limitations; and |

(ii) Ensure that each of its ESRs suspends charging until the EEA is recalled, except under the following circumstances:

(A) The ESR has a current SCED Base Point Instruction, LFC Dispatch Instruction, or manual Dispatch Instruction to charge the ESR;

(B) The ESR is actively providing Primary Frequency Response; or

(C) The ESR is co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System, in which case the ESR may continue to charge as long as maximum output to the ERCOT System is maintained.

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| [NPRR995: Replace paragraph (ii) above with the following upon system implementation:](ii) Ensure that each of its ESRs and SOESSs suspends charging until the EEA is recalled, except under the following circumstances:(A) The ESR has a current SCED Base Point Instruction, LFC Dispatch Instruction, or manual Dispatch Instruction to charge the ESR; (B) The ESR or SOESS is actively providing Primary Frequency Response; or (C) The ESR or SOESS is co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System, in which case the ESR may continue to charge as long as maximum output to the ERCOT System is maintained. |

(2) ERCOT may declare an EEA Level 2 when the clock-minute average system frequency falls below 59.91 Hz for 15 consecutive minutes. ERCOT will declare an EEA Level 2 when PRC falls below 2,000 MW and is not projected to be recovered above 2,000 MW within 30 minutes without the use of the following actions that are prescribed for EEA Level 2:

(a) In addition to the measures associated with EEA Level 1, ERCOT shall take the following steps to maintain steady state system frequency at a minimum of 59.91 Hz and maintain PRC above 1,500 MW:

(i) Instruct TSPs and DSPs or their agents to reduce Customer Load by using existing, in-service distribution voltage reduction measures that have not already been implemented. A TSP, DSP, or their agent shall implement these instructions if distribution voltage reduction measures are available and already installed. If the TSP, DSP, or their agent determines in their sole discretion that the distribution voltage reduction would adversely affect reliability, the voltage reduction measure may be reduced, modified, or otherwise changed from maximum performance to a level of exercise that has no negative impact to reliability.

(ii) Instruct TSPs and DSPs to implement any available Load management plans to reduce Customer Load.

(iii) Instruct QSEs to deploy ECRS or RRS (controlled by high-set under-frequency relays) supplied from Load Resources. ERCOT may deploy ECRS or RRS simultaneously or separately, and in any order. ERCOT shall issue such Dispatch Instructions in accordance with the deployment methodologies described in paragraph (iv) below.

(iv) Load Resources providing ECRS that are not controlled by high-set under-frequency relays shall be deployed prior to Group 1 deployment. ERCOT shall deploy ECRS and RRS capacity supplied by Load Resources (controlled by high-set under-frequency relays) in accordance with the following:

(A) Instruct QSEs to deploy RRS with a Group 1 designation and all of the ECRS that is supplied from Load Resources (controlled by high-set under-frequency relays) by instructing the QSE representing the specific Load Resources to interrupt Group 1 Load Resources providing ECRS and RRS. QSEs shall deploy Load Resources according to the group designation and will be given some discretion to deploy additional Load Resources from any of the groups not designated for deployment if Load Resource operational considerations require such. ERCOT shall issue notification of the deployment via XML message. ERCOT shall follow this XML notification with a QSE Hotline VDI, which shall initiate the ten-minute deployment period;

(B) At the discretion of the ERCOT Operator, instruct QSEs to deploy RRS that is supplied from Load Resources (controlled by high-set under-frequency relays) by instructing the QSE representing the specific Load Resource to interrupt additional Load Resources providing RRS based on their group designation. ERCOT shall issue notification of the deployment via XML message. ERCOT shall follow this XML notification with a QSE Hotline VDI, which shall initiate the ten-minute deployment period;

(C) The ERCOT Operator may deploy Load Resources providing only ECRS (not controlled by high-set under-frequency relays) and all groups of Load Resources providing RRS and ECRS at the same time. ERCOT shall issue notification of the deployment via XML message. ERCOT shall follow this XML notification with a QSE Hotline VDI, which shall initiate the ten-minute deployment period; and

(D) ERCOT shall post a list of Load Resources on the MIS Certified Area immediately following the DRUC for each QSE with a Load Resource obligation which may be deployed to interrupt under paragraph (A) and paragraph (B). ERCOT shall develop a process for determining which individual Load Resource to place in each group based on a random sampling of individual Load Resources. At ERCOT’s discretion, ERCOT may deploy all Load Resources at any given time during EEA Level 2.

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| [NPRR1010: Replace paragraph (D) above with the following upon system implementation of the Real-Time Co-Optimization (RTC) project:](D) ERCOT shall post a list of Load Resources on the MIS Certified Area immediately following the DRUC for each QSE with a Load Resource RRS or ECRS award, which may be deployed to interrupt under paragraph (A) and paragraph (B). ERCOT shall develop a process for determining which individual Load Resource to place in each group based on a random sampling of individual Load Resources. At ERCOT’s discretion, ERCOT may deploy all Load Resources at any given time during EEA Level 2. |

(v) Unless a media appeal is already in effect, ERCOT shall issue an appeal through the public news media for voluntary energy conservation; and

(vi) With the approval of the affected non-ERCOT Control Area, TSPs, DSPs, or their agents may implement transmission voltage level BLTs, which transfer Load from the ERCOT Control Area to non-ERCOT Control Areas in accordance with BLTs as defined in the Operating Guides.

(b) Confidentiality requirements regarding transmission operations and system capacity information will be lifted, as needed to restore reliability.

(3) ERCOT may declare an EEA Level 3 when the clock-minute average system frequency falls below 59.91 Hz for 20 consecutive minutes or when steady-state frequency falls below 59.8 Hz. ERCOT will declare an EEA Level 3 when PRC cannot be maintained above 1,500 MW or when the clock-minute average system frequency falls below 59.91 Hz for 25 consecutive minutes. Upon declaration of an EEA Level 3, ERCOT shall take any of the following measures as necessary to recover frequency or PRC to the minimum required levels:

(a) Instruct ESRs to suspend charging. For ESRs, ERCOT shall issue the suspension instruction via a SCED Base Point instruction, or, if otherwise necessary, via a manual Dispatch Instruction. An ESR shall suspend charging unless it is providing Primary Frequency Response, has received a charging instruction via SCED Base Point, or is carrying Reg-Down and has received a charging instruction from LFC. However, an ESR co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System may continue to charge as long as maximum output to the ERCOT System is maintained.

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| [NPRR995: Replace paragraph (a) above with the following upon system implementation:](a) Instruct ESRs to suspend charging. For ESRs, the suspension instruction shall be issued via a SCED Base Point, or, if otherwise necessary, via a manual Dispatch Instruction. An ESR shall suspend charging unless it is providing Primary Frequency Response, has received a charging instruction via SCED Base Point, or is carrying Reg-Down and has received a charging instruction from LFC. An SOESS shall suspend charging unless it is providing Primary Frequency Response. However, an ESR or SOESS co-located behind a POI with onsite generation that is incapable of exporting additional power to the ERCOT System may continue to charge as long as maximum output to the ERCOT System is maintained. |

(b) Direct all TOs to shed firm Load, in 100 MW blocks, distributed as documented in the Operating Guides in order to maintain a steady state system frequency at a minimum of 59.91 Hz and to recover 1,500 MW of PRC within 30 minutes.

(i) TOs and TDSPs may:

(A) Manually shed Load connected to under-frequency relays and/or under-voltage relays pursuant to an ERCOT Load shed directive issued during EEA Level 3 so long as the TO has determined that system conditions warrant utilizing Load connected to under-frequency and/or under-voltage relays and each affected TO continues to comply with its Under-Frequency Load Shed (UFLS) obligation as described in Nodal Operating Guide Section 2.6.1, Automatic Firm Load Shedding, and its Load shed obligation as described in Nodal Operating Guide Section 4.5.3.4, Load Shed Obligation.

(B) Manually shed Load that is armed to deploy as part of the 58.5 Hz, 58.7 Hz, and anti-stall UFLS stages, such that the UFLS Load falls below the TO’s 25% Load relief obligation, as described in Nodal Operating Guide Section 2.6.1, in order to meet ERCOT operating instructions for manual Load shed if all Load identified for manual Load shed and the Load identified in paragraph (A) above has been shed.

(c) Implement any appropriate measures associated with EEA Levels 1 and 2 that have not already been implemented.