



## Item 9.5: Revision Request Status Update

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Reliability and Markets Committee Meeting

ERCOT Public

December 2, 2024

# Revision Request Status Update: Overview

- **Purpose**

Provide an update on recent Revision Request activity and key policy issues currently in the stakeholder process

- **Key Takeaway(s)**

- 17 Revision Requests for October Board Consideration
- 56 Revision Requests currently in process
  - 14 new Revision Requests posted since August Board meeting
- Aging Revision Requests:
  - 9 Revision Requests on aging list – tabled for more than 7 months
- ERCOT expects key policy decisions regarding Real-Time Co-Optimization (RTC), Dispatchable Reliability Reserve Service (DRRS), and large load issues to be in front of the Board in 2025

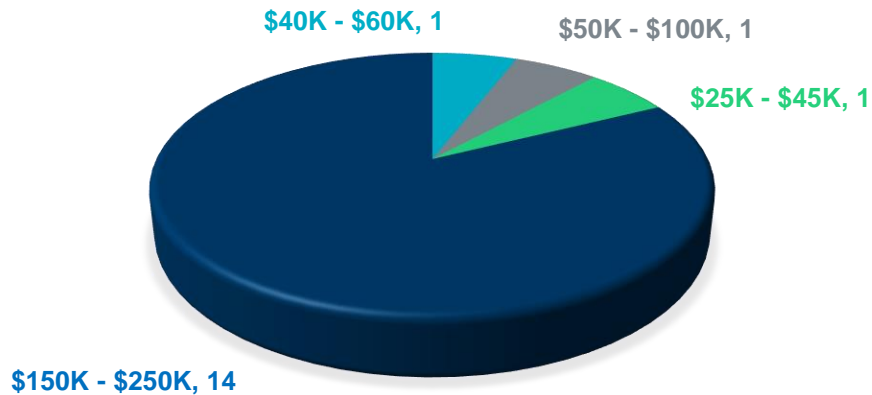
# 17 Revision Requests for December Board Consideration

## Revision Requests Recommended for Approval by TAC – Unopposed:

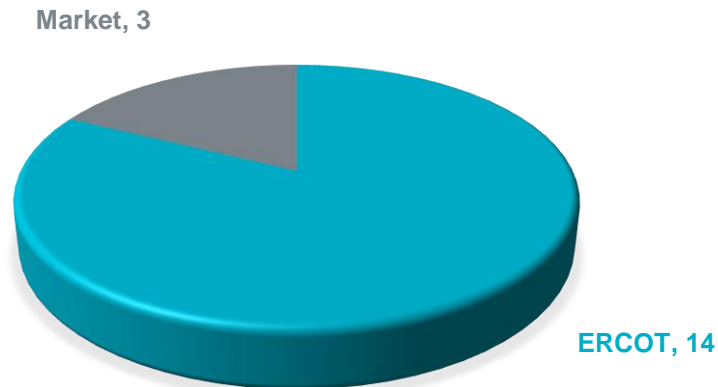
- NPRR1180, Inclusion of Forecasted Load in Planning Analyses
- NPRR1239, Access to Market Information
- NPRR1240, Access to Transmission Planning Information
- NPRR1245, Additional Clarifying Revisions to Real-Time Co-Optimization
- NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- NPRR1247, Incorporation of Congestion Cost Savings Test in Economic Evaluation of Transmission Projects – URGENT
- NPRR1248, Correction to NPRR1197, Optional Exclusion of Load from Netting at EPS Metering Facilities which Include Resources
- NPRR1249, Publication of Shift Factors for All Active Transmission Constraints in the RTM
- NPRR1254, Modeling Deadline for Initial Submission of Resource Registration Data
- NOGRR266, Related to NPRR1239, Access to Market Information
- NOGRR267, Related to NPRR1240, Access to Transmission Planning Information
- NOGRR268, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- OBDRR052, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- OBDRR053, Alignment with NPRR1131, Controllable Load Resource Participation in Non-Spin, and Minor Clean-Ups
- PGRR107, Related to NPRR1180, Inclusion of Forecasted Load in Planning Analyses
- PGRR116, Related to NPRR1240, Access to Transmission Planning Information
- PGRR118, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era

# 17 Revision Requests for December Board Consideration

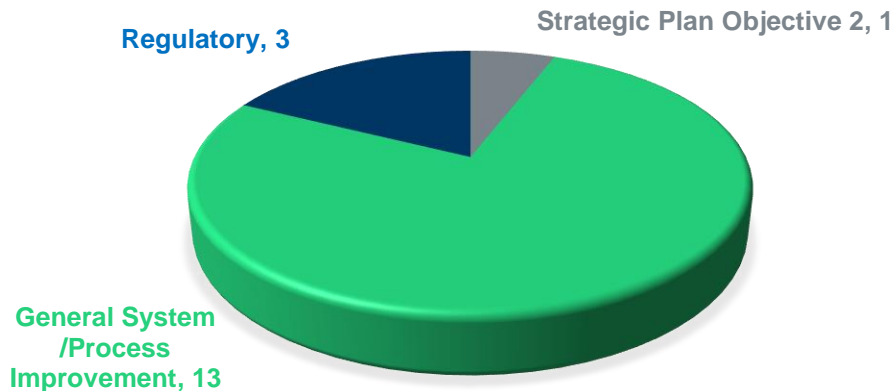
## BUDGETARY IMPACTS



## SPONSORSHIP

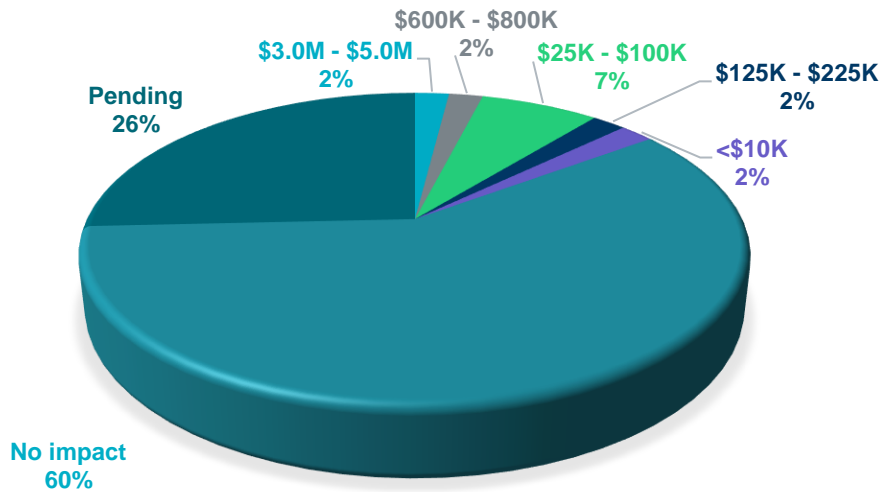


## REASON FOR REVISION

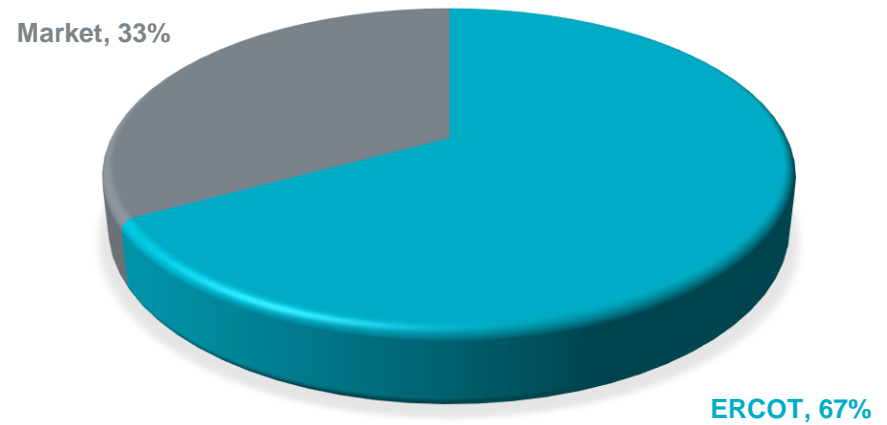


# 57 Revision Requests in Process

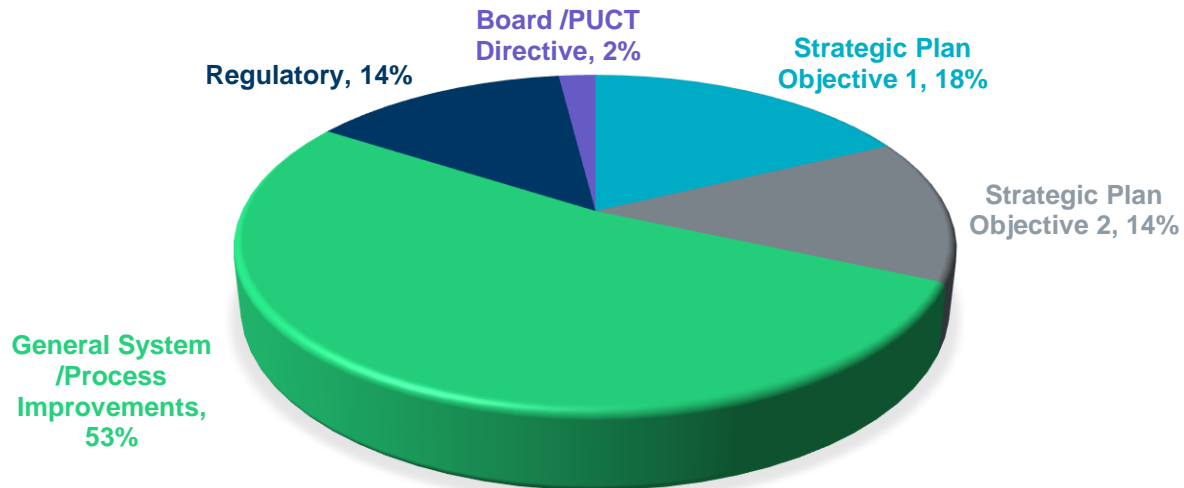
## BUDGETARY IMPACTS



## SPONSORSHIP

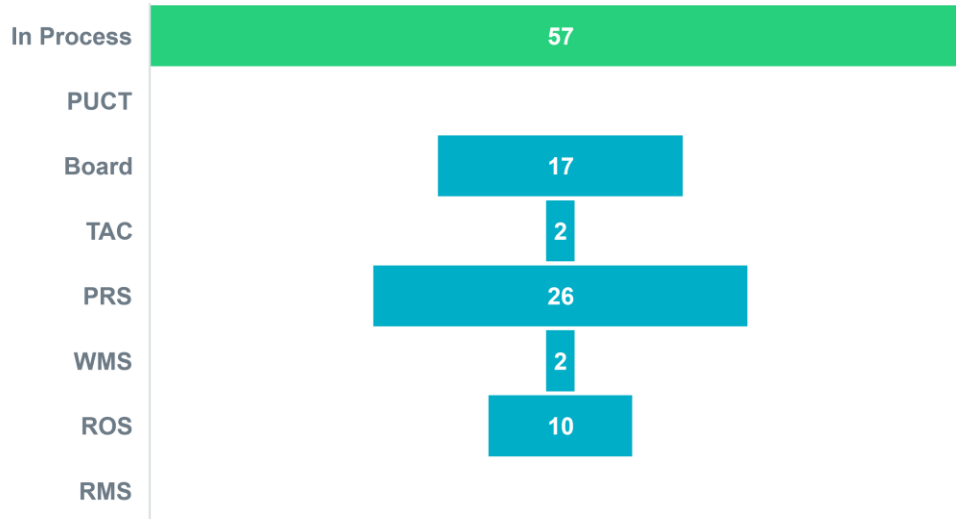


## REASON FOR REVISION

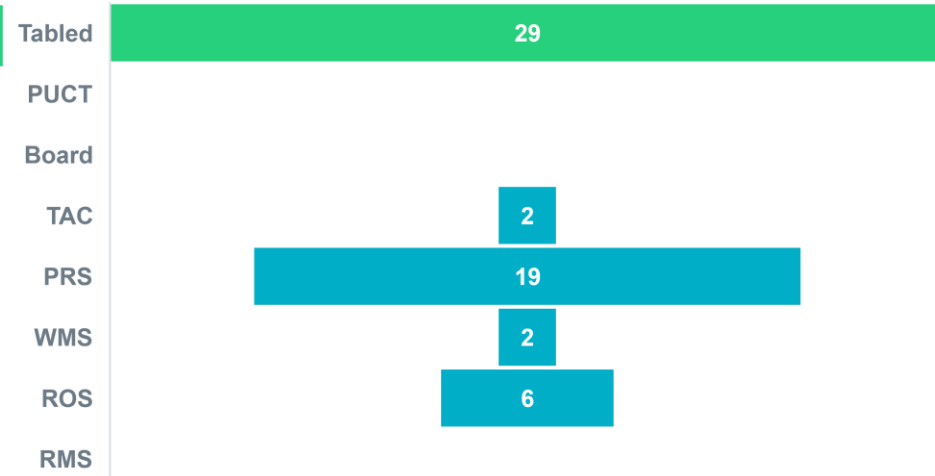


# 57 Revision Requests in Process

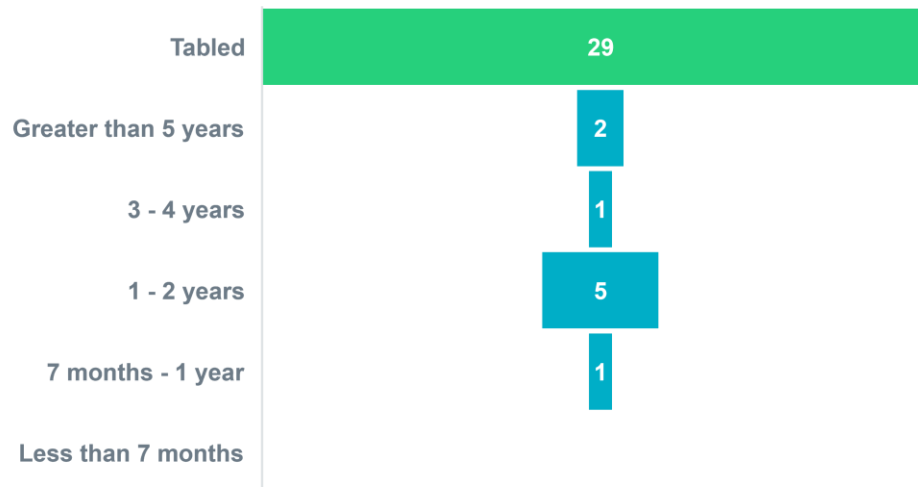
## LOCATION OF REVISION REQUESTS



## LOCATION OF TABLED REVISION REQUESTS



## LENGTH TABLED



**\*\* Additional details on Tabled Revision Requests in Appendix**



# High-Impact Policy Issues in the Stakeholder Process

## Real-Time Co-Optimization + Batteries (RTC+B)

- **RTC+B Policy Parameters**

- During the original development (2019-2020) of RTC key principles and Protocols, technical details were flagged as TAC-approved parameters to be resolved at a later date.
- ERCOT will work with RTC+B Task Force to sponsor a single NPRR to incorporate parameters flagged as TAC- and Board-approved items and values into the Protocols.
- ***Expected to file by January 2025 for Board consideration in April 2025, PUC approval in May 2025 prior to Market Trials.***

- **Ancillary Services Demand Curves (ASDC)**

- In 2020, ASDC design was memorialized in Protocol Section 4.4.12 and replicates the pricing outcome of the Operating Reserve Demand Curve (ORDC). ASDC values are parameterized and can be changed within the shape of the existing ORDC.
- ERCOT is open to engaging with stakeholders to re-evaluate and update the ASDCs.
  - › If there is a **consensus**, ERCOT can work with RTC+B Task Force to **sponsor an NPRR to file by January 2025 for Board consideration in April 2025, PUC approval in May 2025 prior to Market Trials.**
  - › Otherwise, the policy discussion can continue in the stakeholder process and any potential changes can be implemented after RTC+B goes live in December 2025.

# High-Impact Policy Issues in the Stakeholder Process

## Dispatchable Reliability Reserve Service (DRRS)

- Required by PURA § 39.159(d) as adopted by H.B. 1500 (88<sup>th</sup> Leg.)
- **NPRR1235, Dispatchable Reliability Reserve Service as a Stand-Alone Ancillary Service**
  - Primary vehicle for specifying how DRRS attributes and other design elements will be incorporated into the Protocols. Conceptually treats DRRS as an Ancillary Service.
  - ***Posted May 29, 2024***
  - ***Current Status: tabled at PRS***
    - › On June 13, 2024, PRS voted unanimously to table NPRR1235 and refer the issue to ROS and WMS
    - › On August 1, 2024, ROS voted to endorse NPRR1235 as submitted (7 abstentions)
    - › Robust stakeholder discussion continues at WMS and its working groups
- Stakeholders have raised questions regarding whether DRRS is an operational tool or a resource adequacy mechanism.
  - Additional PUC discussion regarding DRRS is expected as part of the Ancillary Services Study (P-55845) in December 2024.
  - ERCOT has requested stakeholder feedback in December 2024 on two high-level design concepts that would provide flexibility for the evolution of DRRS as system needs evolve.



# High-Impact Policy Issues in the Stakeholder Process

## Large Load Issues

- **ERCOT-Sponsored**, “Large Loads”—defined to refer to one or more Facilities at a single site with an aggregate peak power Demand of 75 MW or more. Establishes a 1 GW maximum single contingency or Point of Interconnection (POI) to address risks to the frequency stability of the ERCOT System.
  - [NPRR1234](#), Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater
    - › Posted May 28, 2024
    - › Current Status: tabled at PRS, referred issue to ROS
  - [PGRR115](#), Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater
    - › Posted May 28, 2024
    - › Current Status: tabled at ROS
- **Market Participant-Sponsored**
  - [NPRR1202](#), Refundable Deposits for Large Load Interconnection Studies
    - › Posted September 22, 2023 (Lancium)
    - › Current Status: tabled at PRS, referred issue to WMS
  - [NPRR1226](#), Demand Response Monitor
    - › Posted April 23, 2024 (ERCOT Steel Mills)
    - › Current Status: tabled at PRS, referred issue to WMS
  - [NPRR1238](#), Voluntary Registration of Loads with Curtailable Load Capabilities
    - › Posted June 6, 2024 (Golden Spread Electric Cooperative)
    - › Current Status: tabled at PRS, referred issue to ROS and WMS

# Appendix

# Aging Revision Requests in Process (Tabled for over 7 months)

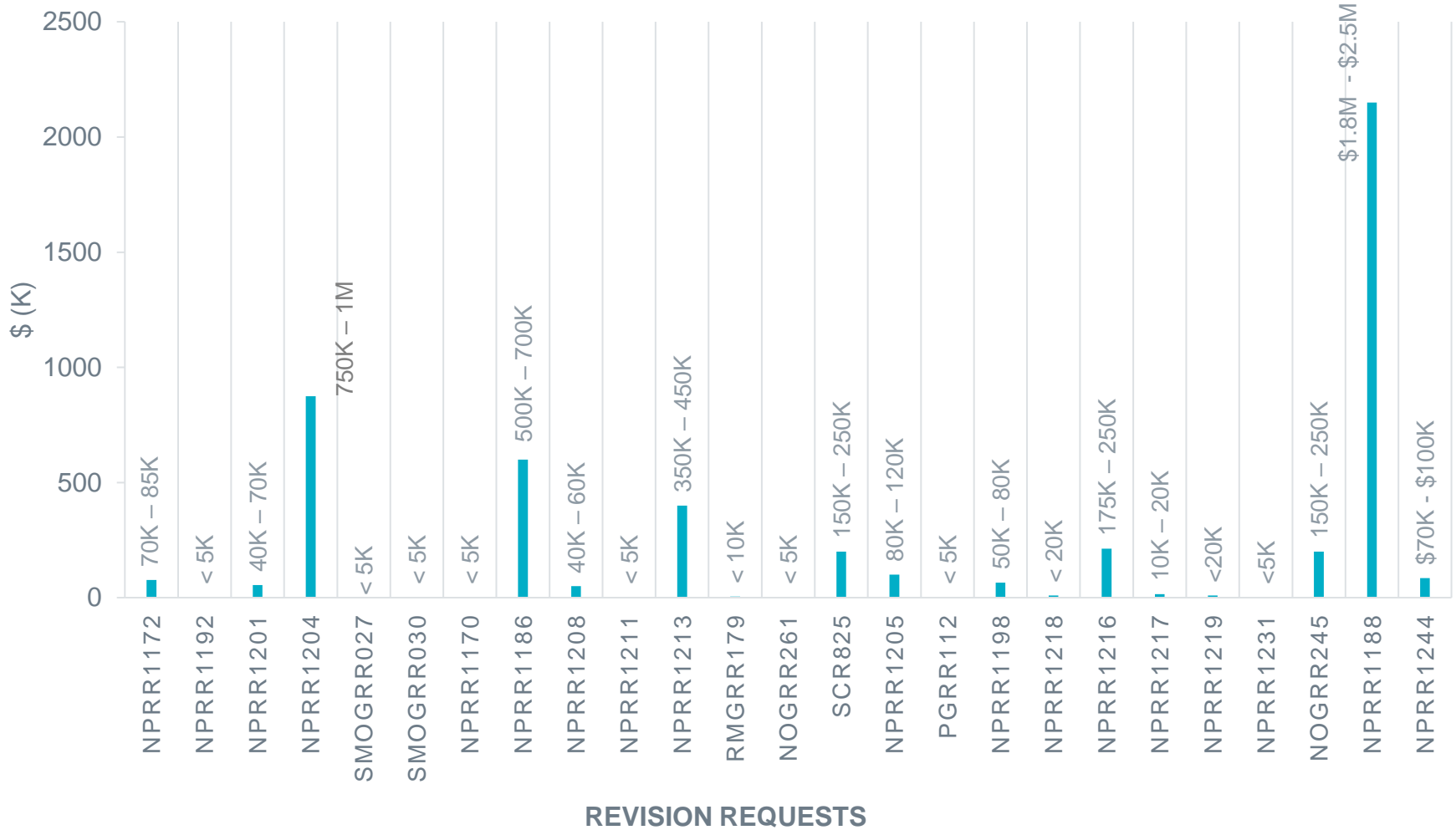
Revision Request	Length Tabled	Notes
<b>NPRR956, Designation of Providers of Transmission Additions.</b> [ERCOT]	Greater than 5 years (7/7/19)	Tabled at PRS. Entities filed suit in the U.S. District Court for the Western District of Texas to challenge the validity of Senate Bill 1938. Recently, the District has issued a verdict against SB 1938 -a decision that is likely to be appealed. ERCOT will continue to comply with SB 1938 unless and until a final judicial determination requires otherwise
<b>PGRR073, Related to NPRR956, Designation of Providers of Transmission Additions.</b> [ERCOT]	Greater than 5 years (8/8/19)	Tabled at ROS. See NPRR956
<b>NPRR1070, Planning Criteria for GTC Exit Solutions.</b> [EDF Renewables / Pattern Energy]	3 - 4 years (4/15/21)	Tabled at PRS. ERCOT requested NPRR be tabled until resolution of related PUCT Rulemaking (see 10/22/21 ERCOT comments). Referred to OWG, PLWG, WMWG for further discussion.
<b>SCR826, ERCOT.com Enhancements</b> [Residential Consumer]	1 – 2 years (7/25/23)	Tabled at PRS. ERCOT is considering the elements of SCR826 in the ERCOT.com redesign efforts, and has added Market Participant feedback forums as part of the effort. ERCOT is working on a process for feedback on dashboards. Discussed at September PRS meeting.
<b>SCR827, Grid Conditions Graph Addition for Operating Reserve Demand Curve (ORDC) Level</b> [ACES]	1 – 2 years (9/13/23)	Tabled at PRS. ERCOT is considering the elements of SCR827 in the ERCOT.com redesign efforts, and has added Market Participant feedback forums as part of the effort. ERCOT is working on a process for feedback on dashboards. Discussed at September PRS meeting.
<b>NPRR1200, Utilization of Calculated Values for Non-WSL for ESRs</b> [NextEra Energy]	1 – 2 years (8/10/23)	Tabled at PRS. Associated with and awaiting action on SMOGRR028.
<b>SMOGRR028, Add Series Reactor Compensation Factors</b> [RWE Clean Energy]	1 – 2 years (9/7/23)	Tabled at WMS. Comments are in development for consideration at the December 2024 MWG and January 2025 WMS meetings.



# Aging Revision Requests in Process (Tabled for over 7 months)

Revision Request	Length Tabled	Notes
<b>NPRR1202, Refundable Deposits for Large Load Interconnection Studies</b> [Lancium]	1 – 2 years (11/9/23)	Tabled at PRS. Referred issue to WMS. 10/11/23 ERCOT comments express concerns with NPRR specifically regarding holding deposits for Large Loads as a non-profit. Multiple sets of stakeholder comments have been filed. WMS is continuing to review.
<b>NPRR1214, Reliability Deployment Price Adder Fix to Provide Locational Price Signals, Reduce Uplift and Risk</b> [Joint Sponsors]	7 months – 1 year (1/11/24)	Tabled at PRS. Referred issue to WMS. Stakeholders have filed comments to narrow the scope of the NPRR. CMWG is continuing to review.

# 2024 Approved Revision Requests – Budgetary Impact



# 2024 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
2/1/24	NPRR1172, Fuel Adder Definition, Mitigated Offer Caps, and RUC Clawback	\$70K - \$85K
2/1/24	NPRR1192, Move OBD to Section 22 – Requirements for Aggregate Load Resource Participation in the ERCOT Markets	< \$5K
2/1/24	NPRR1201, Limitations on Resettlement Timeline and Default Uplift Exposure Adjustments	\$40K - \$70K
2/1/24	NPRR1204, Considerations of State of Charge with Real-Time Co-Optimization Implementation	\$750K - \$1M
4/11/24	SMOGRR027, Move OBD to Settlement Metering Operating Guide – EPS Metering Design Proposal	< \$5K
4/11/24	SMOGRR030, Move OBD to Settlement Metering Operating Guide – EPS Metering Facility Temporary Exemption Request Application Form	< \$5K
4/11/24	NPRR1170, Submission of Gas Supply Disruption	< \$5K
4/11/24	NPRR1186, Improvements Prior to the RTC+B Project for Better ESR State of Charge Awareness, Accounting, and Monitoring	\$500K – \$700K
4/11/24	NPRR1208, Creation of Invoice Report	\$40K - \$60K
4/11/24	NPRR1211, Move OBD to Section 22 – Methodology for Setting Maximum Shadow Prices for Network and Power Balance Constraints	< \$5K
4/11/24	NPRR1213, Allow DGRs and DESRs on Circuits Subject to Load Shed to Provide ECRS and Clarify Language Regarding DGRs and DESRs Providing Non-Spin	\$350K - \$450K
4/11/24	RMGRR179, TDSP Temporary Emergency Electric Energy Facility (TEEEF) Deployment Transactional Processing	< \$10K
4/11/24	NOGRR261, Move OBD to Section 8 – Procedure for Calculating RRS Limits for Individual Resources	< \$5K
4/11/24	SCR825, ERCOT Voice Communications Aggregation	\$150K - \$250K
6/13/24	NPRR1205, Revisions to Credit Qualification Requirements of Banks and Insurance Companies	\$80K - \$120K



# 2024 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
7/25/24	PGRR112, Dynamic Data Model and Full Interconnection Study (FIS) Deadline for Quarterly Stability Assessment	<\$5K
7/25/24	NPRR1198, Congestion Mitigation Using Topology Reconfigurations	\$50K - \$80K
7/25/24	NPRR1218, REC Program Changes Per P.U.C. SUBST. R. 25.173, Renewable Energy Credit Program	<\$20K
9/26/24	NPRR1216, Implementation of Emergency Pricing Program	\$175K - \$250K
9/26/24	NPRR1217, Remove Verbal Dispatch Instruction (VDI) Requirement for Deployment and Recall of Load Resources and Emergency Response Service (ERS) Resources	\$10K - \$20K
9/26/24	NPRR1219, Methodology Revisions and New Definitions for the Report on Capacity, Demand and Reserves in the ERCOT Region (CDR)	<\$20K
9/26/24	NPRR1231, FFSS Program Communication Improvements and Additional Clarifications	<\$5K
9/26/24	NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements	\$150K - \$250K
11/21/24	NPRR1188,	\$1.8M - \$2.5M
11/21/24	NPRR1244,	\$70K - \$100K
	<b>TOTAL</b>	<b>~ \$4.3M - \$6.0M</b>

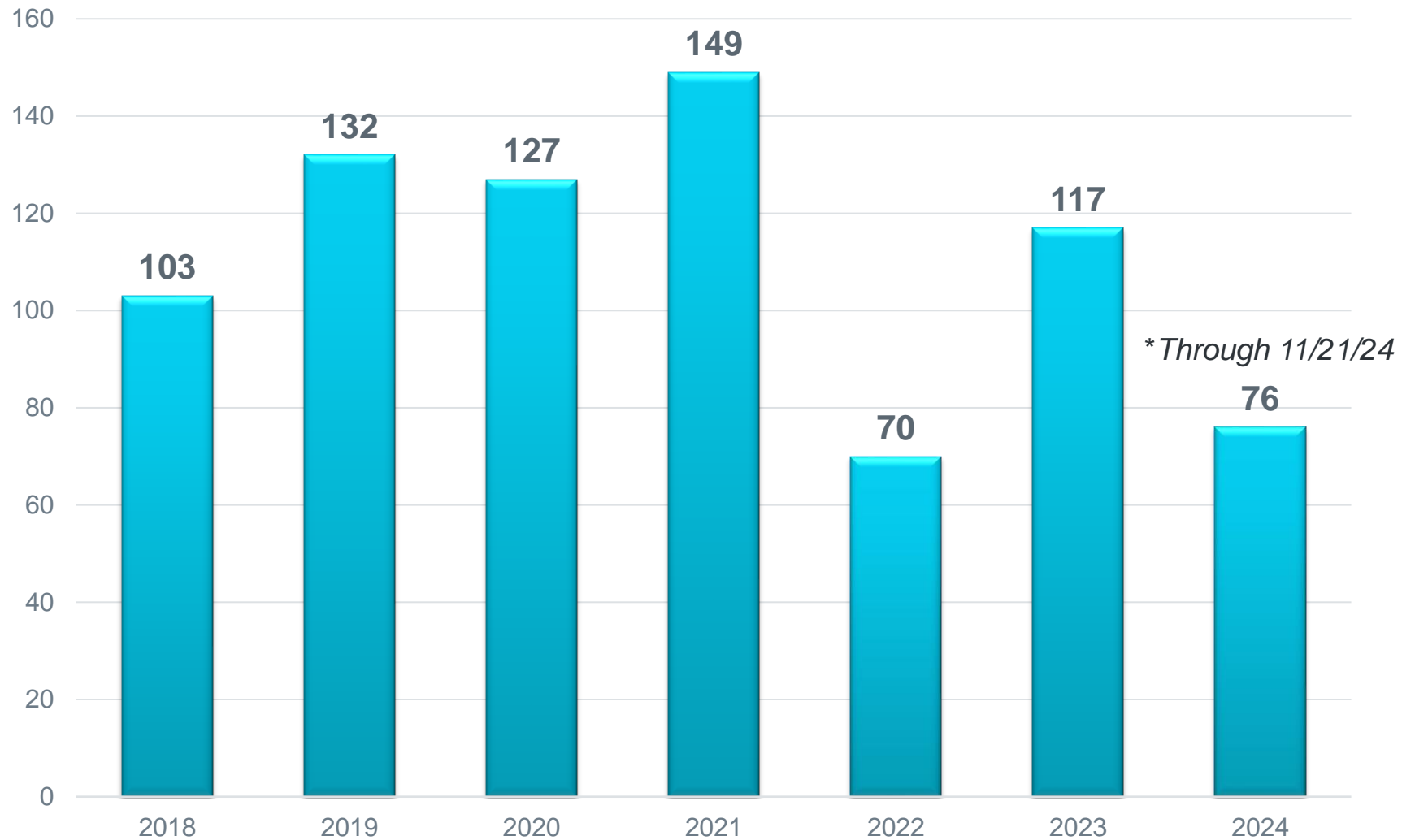
# 2024 Approved Revision Requests – Staffing Impact

PUC Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
7/25/24	NPRR1198, Congestion Mitigation Using Topology Reconfigurations	Grid Analysis	1.0	1.0
9/26/24	NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements	Dynamic Studies Resource Integration Event Analysis Operations	3.2 1.0 1.3 2.2 – 4.3	3.0 1.0 1.0 – 2.0 2.0 – 4.0
<b>Totals</b>			<b>8.7 - 10.8</b>	<b>8.0 - 11.0</b>

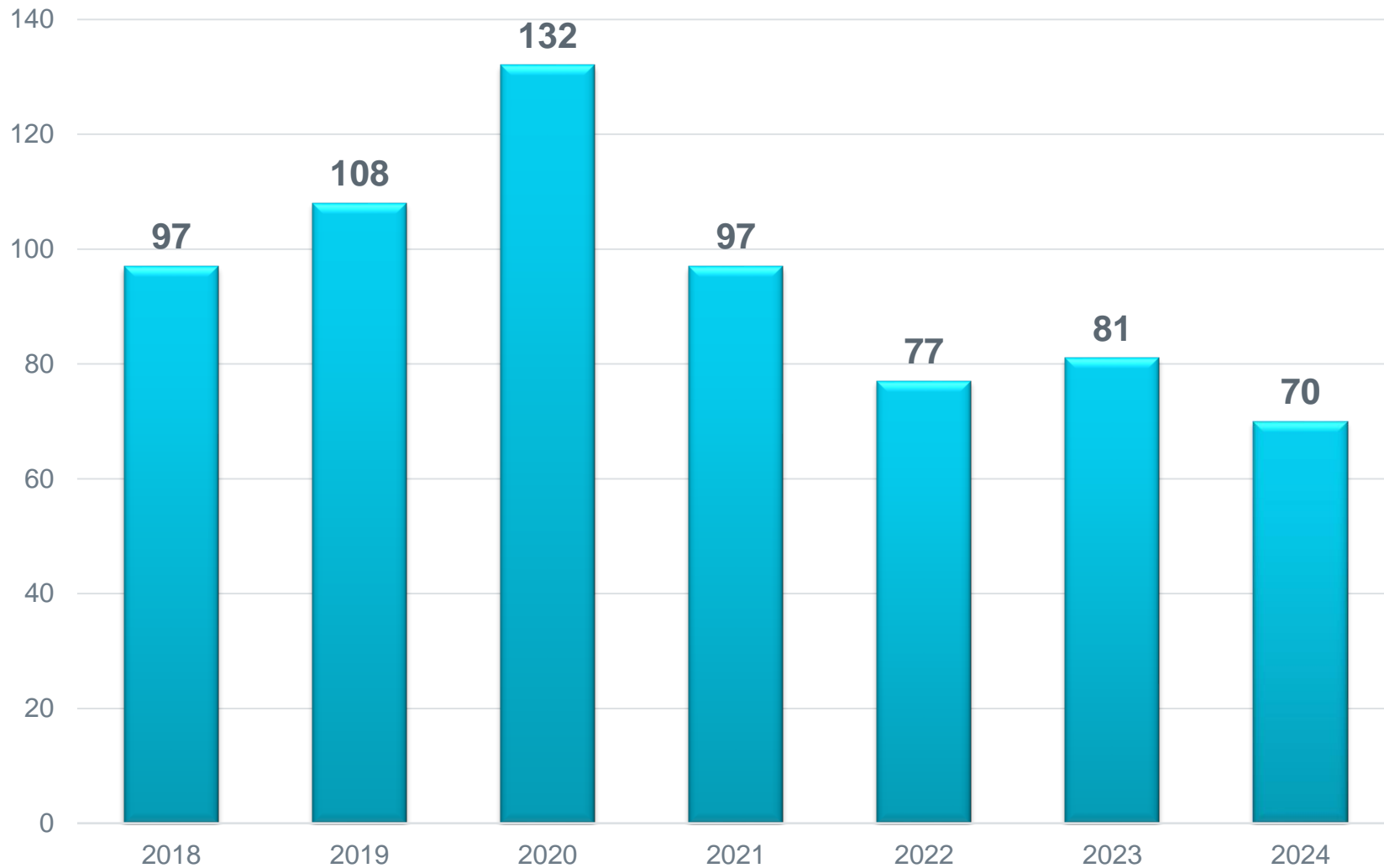




# Statistics – New Revision Requests Submitted

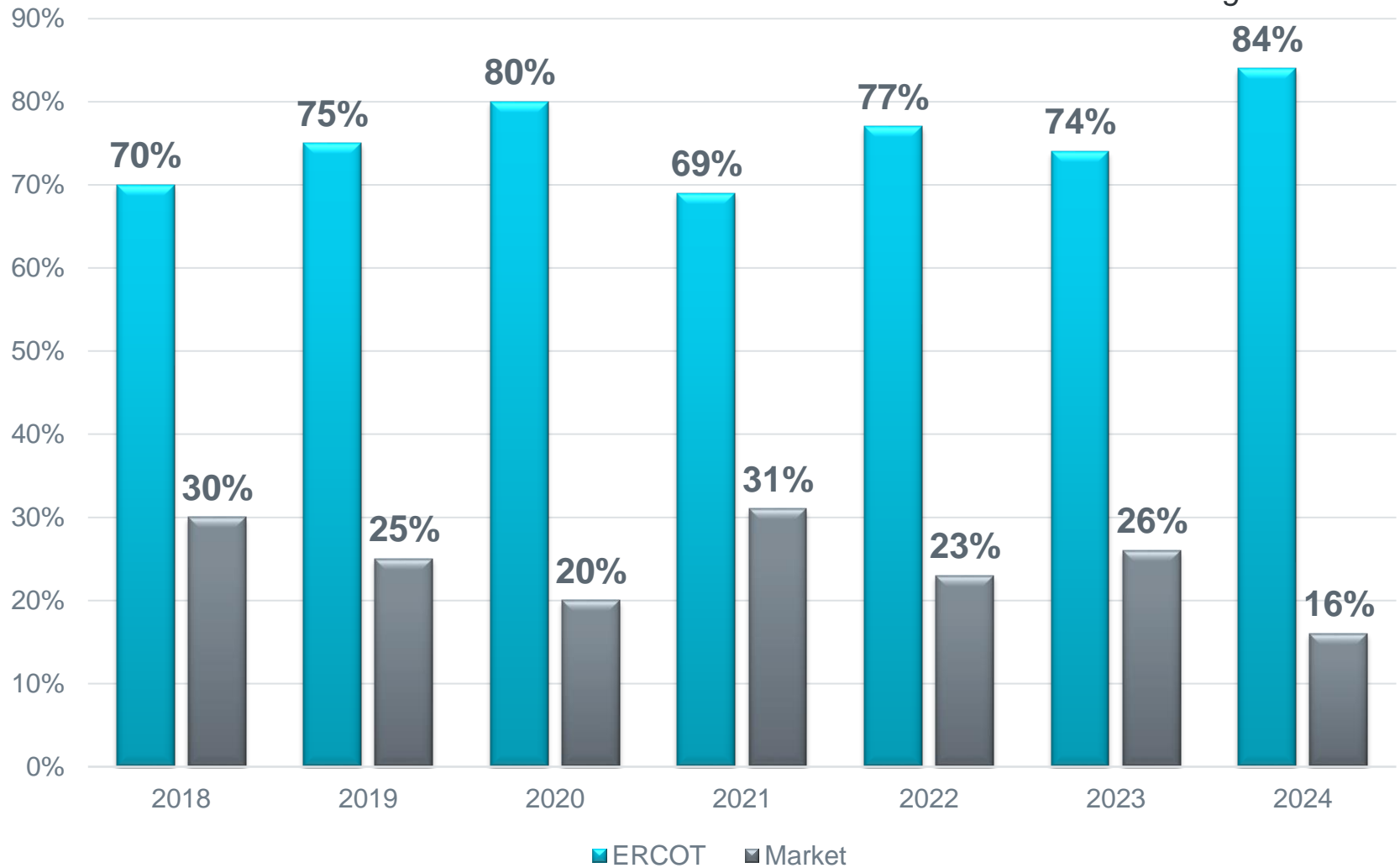


# Statistics – Approved Revision Requests



# Statistics – Revision Request Sponsorship

\*Through 11/21/24



## Appendix: Acronyms

Acronym	Term
ASDC	Ancillary Services Demand Curve
COP	Current Operating Plan
CMWG	Congestion Management Working Group
DC Tie	Direct Current Tie
DESR	Distribution Energy Storage Resource
DG	Distributed Generation
DGR	Distribution Generation Resource
DRRS	Dispatchable Reliability Reserve Service
DWG	Dynamics Working Group
ECRS	ERCOT Contingency Reserve Service
FFR	Fast Frequency Response
GIC	Geomagnetically-Induced Current
GIM	Generator Interconnection or Modification
GTC	Generic Transmission Constraint
IBRTF	Inverter-Based Resource Task Force
IRR	Intermittent Renewable Resource
LFLTf	Large Flexible Load Task Force
LSL	Low Sustained Limit
MCWG	Market Credit Working Group
NDSWG	Network Data Support Working Group

## Appendix: Acronyms

Acronym	Term
NPRR	Nodal Protocol Revision Request
NOGRR	Nodal Operating Guide Revision Request
ORDC	Operating Reserve Demand Curve
OWG	Operations Working Group
PDCWG	Performance, Disturbance, Compliance Working Group
PGRR	Planning Guide Revision Request
PLWG	Planning Working Group
POI	Point of Interconnection
PRC	Physical Responsive Capability
PRS	Protocol Revision Subcommittee
QSGR	Quick Start Generation Resource
QSE	Qualified Scheduling Entity
RMGRR	Retail Market Guide Revision Request
ROS	Reliability and Operations Working Group
RRGRR	Resource Registration Glossary Revision Request
RTC+B	Real-Time Cooptimization plus Batteries
RUC	Reliability Unit Commitment
SCR	System Change Request
Texas SET	Texas Standard Electronic Transaction
TSP	Transmission Service Provider

## Appendix: Acronyms

Acronym	Term
UFLS	Under-Frequency Load Shed
VCMRR	Verifiable Cost Manual Revision Request
VPWG	Voltage Profile Working Group
WMS	Wholesale Market Subcommittee
WMWG	Wholesale Market Working Group