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| NPRR Number | [**1261**](https://www.ercot.com/mktrules/issues/NPRR1261) | NPRR Title | **Operational Flexibility for CRR Auction Transaction Limits** |
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| Date | December 6, 2024 |
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| Submitter’s Information |
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| Market Segment | Independent Power Marketer (IPM) |

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| Comments |

DC Energy supports Nodal Protocol Revision Request (NPRR) 1261’s goal of maximizing market liquidity while minimizing the risk of performance issues in Congestion Revenue Right (CRR) Long-Term Auction Sequence Auctions. These two goals can often be in conflict where advancing one could detriment the other. This NPRR will give ERCOT full discretion over decisions that impact this tradeoff. To ensure that ERCOT’s decisions remain in line with the desire of stakeholders and CRR auction participants, we request that ERCOT continue to provide transparency behind the decisions they are making.

Specifically, upon completion of each CRR Long-Term Auction Sequence, we ask that ERCOT continue to disclose the number of transactions and the execution time of that auction to the Congestion Management Working Group (CMWG). For auctions where a transaction adjustment period is utilized, we recommend ERCOT test the execution time of the auction on the original transaction set. We understand ERCOT’s computation and analytical time is limited, but we believe this information is important to understand if a transaction adjustment period was indeed needed and whether the implementation of the transaction adjustment period could be modified to better achieve the dual goals of this NPRR. If ERCOT utilizes any other information to inform their decision around transaction limits, we also ask that this be disclosed.

In addition, ERCOT should continue to provide updates to CMWG on future changes to software or hardware that would materially change auction execution times.

DC Energy appreciates the transparency on this topic that ERCOT is currently providing to CMWG. ERCOT staff have indicated that they plan to continue to provide the above transparency going forward. We submit these comments to memorialize our request for this information on an ongoing basis as long as restrictive bid transaction limits are in effect.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None