



Item 9.5: Revision Request Status Update

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Reliability and Markets Committee Meeting

ERCOT Public

February 3, 2025

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 February Board Consideration
- 59 Revision Requests currently in process
 - 15 new Revision Requests posted since December Board meeting
- Aging Revision Requests:
 - 12 Revision Requests on aging list – tabled for more than 7 months
- ERCOT expects key policy issues to be in front of the Board in 2025, including decisions regarding Real-Time Co-Optimization (RTC), Dispatchable Reliability Reserve Service (DRRS), and large loads

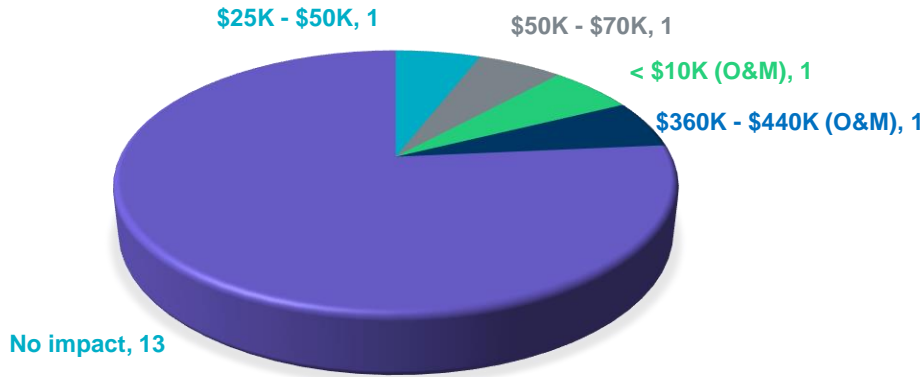
17 Revision Requests for February Board Consideration

Revision Requests Recommended for Approval by TAC – Unopposed:

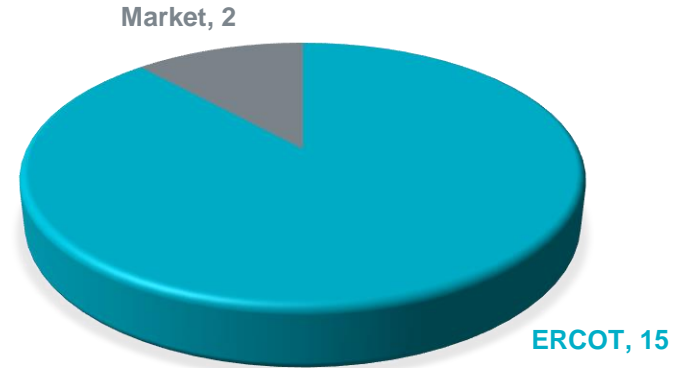
- NPRR1243, Revision to Requirements for Notice and Release of Protected Information or ECEII to Certain Governmental Authorities
- NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- NPRR1250, RPS Mandatory Program Termination
- NPRR1251, Updated FFSS Fuel Replacement Costs Recovery Process
- NPRR1252, Pre-notice for Sharing of Some Information, Addition of Research and Innovation Partner, Clarifying Notice Requirements
- NPRR1253, Incorporate ESR Charging Load Information into ICCP
- NPRR1257, Limit on Amount of RRS a Resource can Provide Using Primary Frequency Response
- NPRR1258, TSP Performance Monitoring Update
- NPRR1259, Update Section 15 Level Response Language
- NPRR1260, Corrections for CLR Requirements Inadvertently Removed
- NPRR1261, Operational Flexibility for CRR Auction Transaction Limits
- NOGRR268, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- NOGRR271, Related to NPRR1257, Limit on Amount of RRS a Resource can Provide Using Primary Frequency Response
- OBDRR052, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- PGRR117, Addition of Resiliency Assessment and Criteria to Reflect PUCT Rule Changes
- PGRR118, Related to NPRR1246, Energy Storage Resource Terminology Alignment for the Single-Model Era
- SCR828, Increase the Number of Resource Certificates Permitted for an Email Domain in RIOO

17 Revision Requests for February Board Consideration

BUDGETARY IMPACTS



SPONSORSHIP

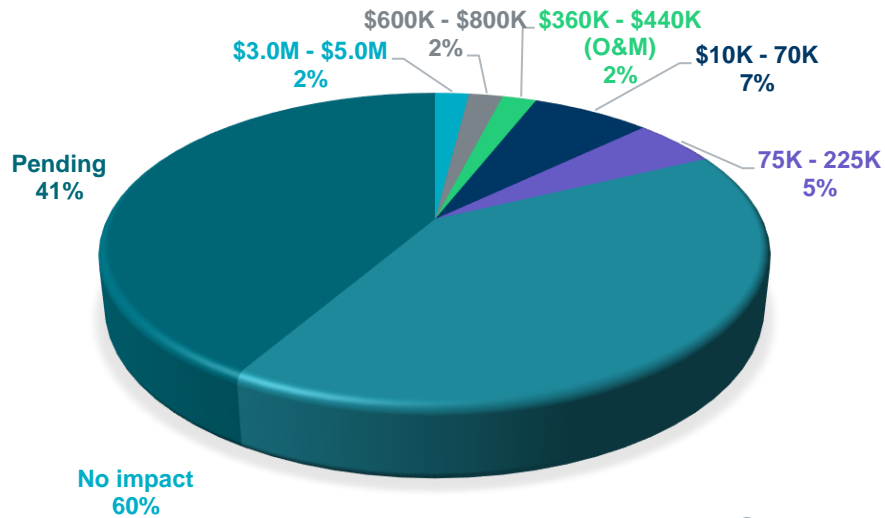


REASON FOR REVISION

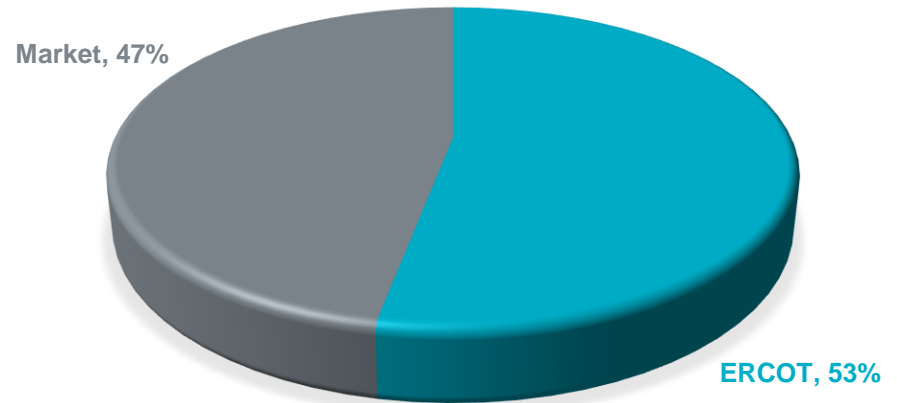


59 Revision Requests in Process

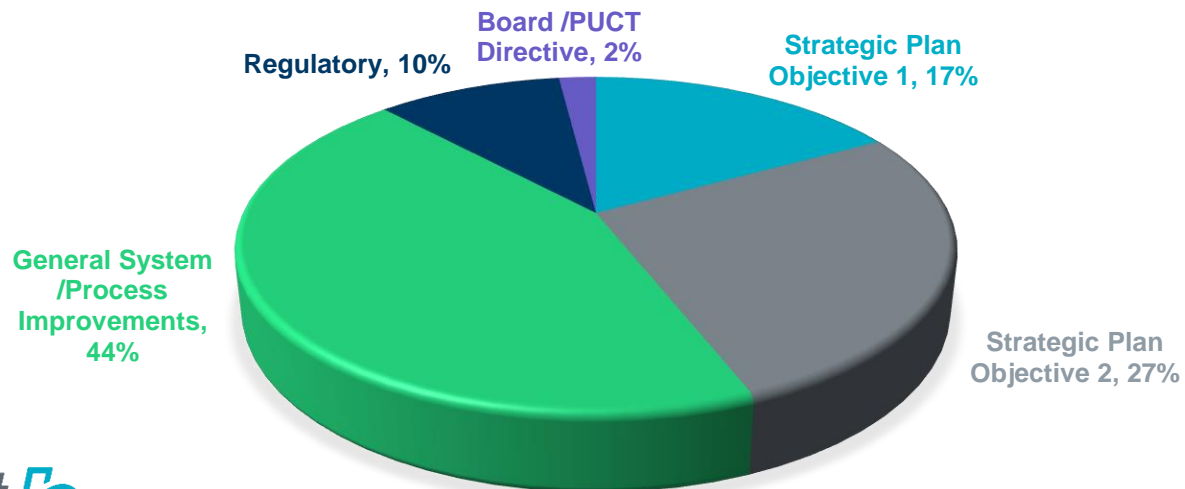
BUDGETARY IMPACTS



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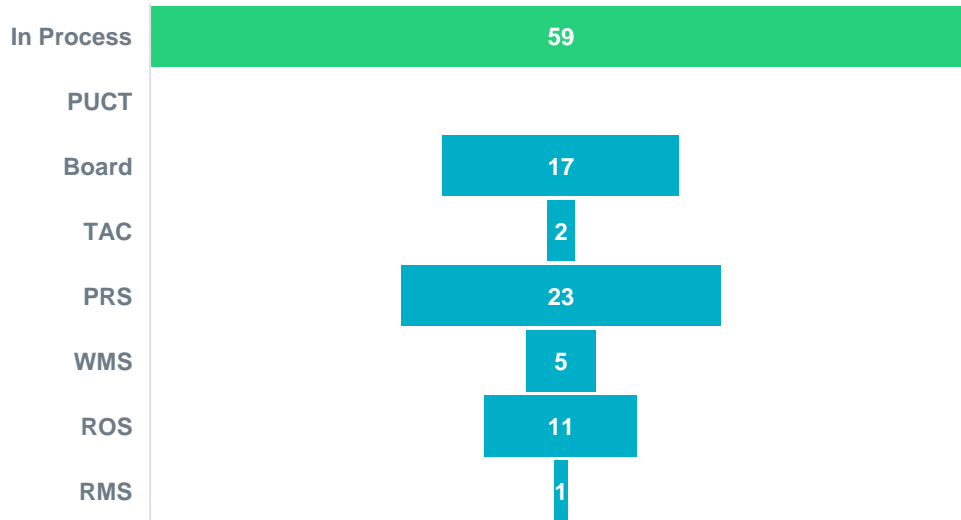


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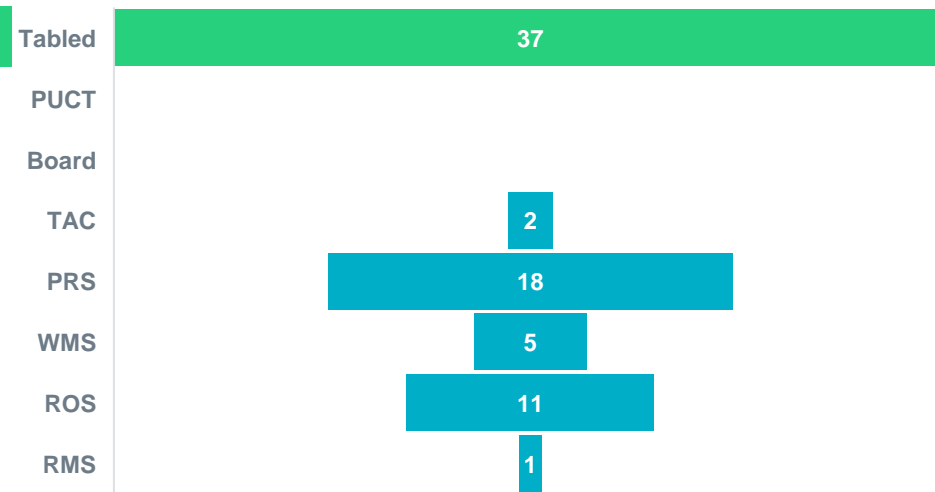


59 Revision Requests in Process

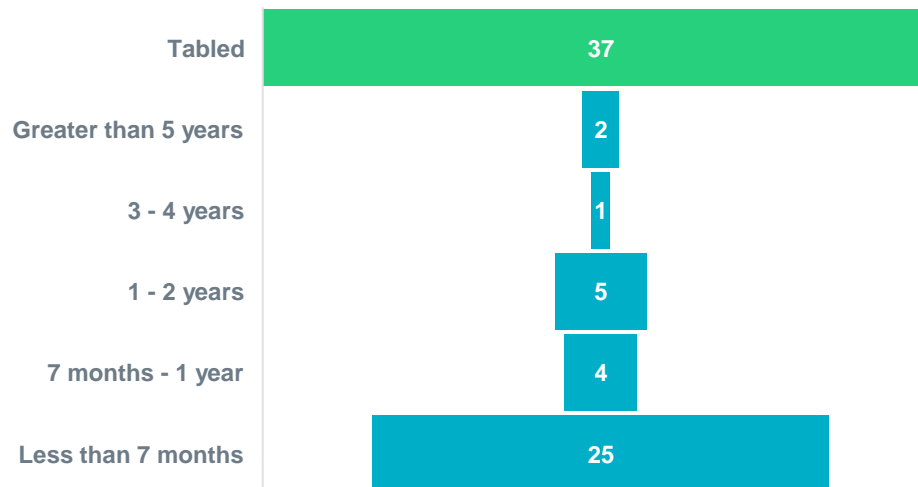
LOCATION OF REVISION REQUESTS



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 sponsoring a NPRR to incorporate parameters flagged as TAC- and Board-approved items and values into the Protocols.
- Ancillary Service duration requirements (State of Charge) will be decoupled as separate NPRR.

- **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 engaging with stakeholders to re-evaluate and update the ASDCs.
 - › IMM shared its ASDC [study](#) at January RTCBTF. IMM is expected to sponsor the NPRR.
 - › If stakeholders do not reach a consensus, the policy discussion can continue in the stakeholder process and any potential changes can be implemented after RTC+B goes live in December 2025.

- **Additional Revisions Required for Implementation**

- ERCOT sponsoring NPRR to specify qualifications for Ancillary Service providers and update requirements for Load Resources,

- **Key Takeaway**

- *All NPRRs are expected for Board consideration in April 2025, PUC approval in May 2025 prior to Market Trials.*



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 (88th 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)
 - › Stakeholder discussions are primarily focused at the Supply Analysis Working Group (SAWG)
 - › [DRRS Workshop](#) scheduled for February 28, 2025
- In December 2024, The PUC provided additional guidance regarding DRRS as part of the Ancillary Services Study (P-55845).
 - ERCOT should design DRRS to ensure that it meets its primary role as an Ancillary Service to mitigate operational risks in real-time and reduce the use of Reliability Unit Commitment (RUC). ERCOT should also design flexibility into the mechanism for procuring DRRS as a potential resource adequacy tool.

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
 - [NPRR1267](#), Large Load Interconnection Status
 - › Posted January 8, 2025 (Joint Sponsors- Residential Consumer/OPUC)
 - › Current Status: pending at PRS for language consideration

Appendix

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

Revision Request	Length Tabled	Notes
NPRR956, Designation of Providers of Transmission Additions. [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
PGR073, Related to NPRR956, Designation of Providers of Transmission Additions. [ERCOT]	Greater than 5 years (8/8/19)	Tabled at ROS. See NPRR956
NPRR1070, Planning Criteria for GTC Exit Solutions. [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.
SCR826, ERCOT.com Enhancements [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 presented the process for feedback on dashboards at the December PRS meeting. Implementations of the feedback forum will be this year; date to be determined.
SCR827, Grid Conditions Graph Addition for Operating Reserve Demand Curve (ORDC) Level [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 presented the process for feedback on dashboards at the December PRS meeting. Implementations of the feedback forum will be this year; date to be determined.
SMOGR028, Add Series Reactor Compensation Factors [RWE Clean Energy]	1 – 2 years (9/7/23)	Tabled at WMS. WMS to consider 1/14/25 Metering Working Group comments at February WMS meeting.
NPRR1202, Refundable Deposits for Large Load Interconnection Studies [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.



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

Revision Request	Length Tabled	Notes
NPRR1214, Reliability Deployment Price Adder Fix to Provide Locational Price Signals, Reduce Uplift and Risk [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.
NPRR1226, Demand Response Monitor [ERCOT Steel Mills]	7 months - 1 year (5/9/24)	Tabled at PRS. WMS endorsed as submitted. 8/7/24 ERCOT comments express concerns with RRs that require specific content and format of dashboards on the ERCOT website. ERCOT is working on formal comments to modify NPRR1226 to be a data-only extract for stakeholders.
NPRR1229, Real-Time Constraint Management Plan Energy Payment [STEC]	7 months - 1 year (6/13/24)	Tabled at PRS. Referred to ROS and WMS. WMS assigned to WMWG. The sponsor (STEC) has filed additional comments every few months in attempts to refine the language and reach compromise. WMWG is continuing to review.
NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater [ERCOT]	7 months - 1 year (6/13/24)	Tabled at PRS. Referred to ROS. ROS assigned to NDSWG. Multiple sets of formal comments from CenterPoint and ERCOT filed at the end of 2024. NDSWG continuing to review.
NPRR1235, Dispatchable Reliability Reserve Service as a Stand-Alone Ancillary Service [ERCOT]	7 months - 1 year (6/13/24)	Tabled at PRS. Referred to WMS. November SAWG discussed feedback from the PUCT Ancillary Services Study regarding DRRS and ERCOT Staff requested feedback from stakeholders on the next steps for DRRS. Depending on the chosen path there may be extensive comments to NPRR1235 or a replacement NPRR filed. SAWG is continuing to review.



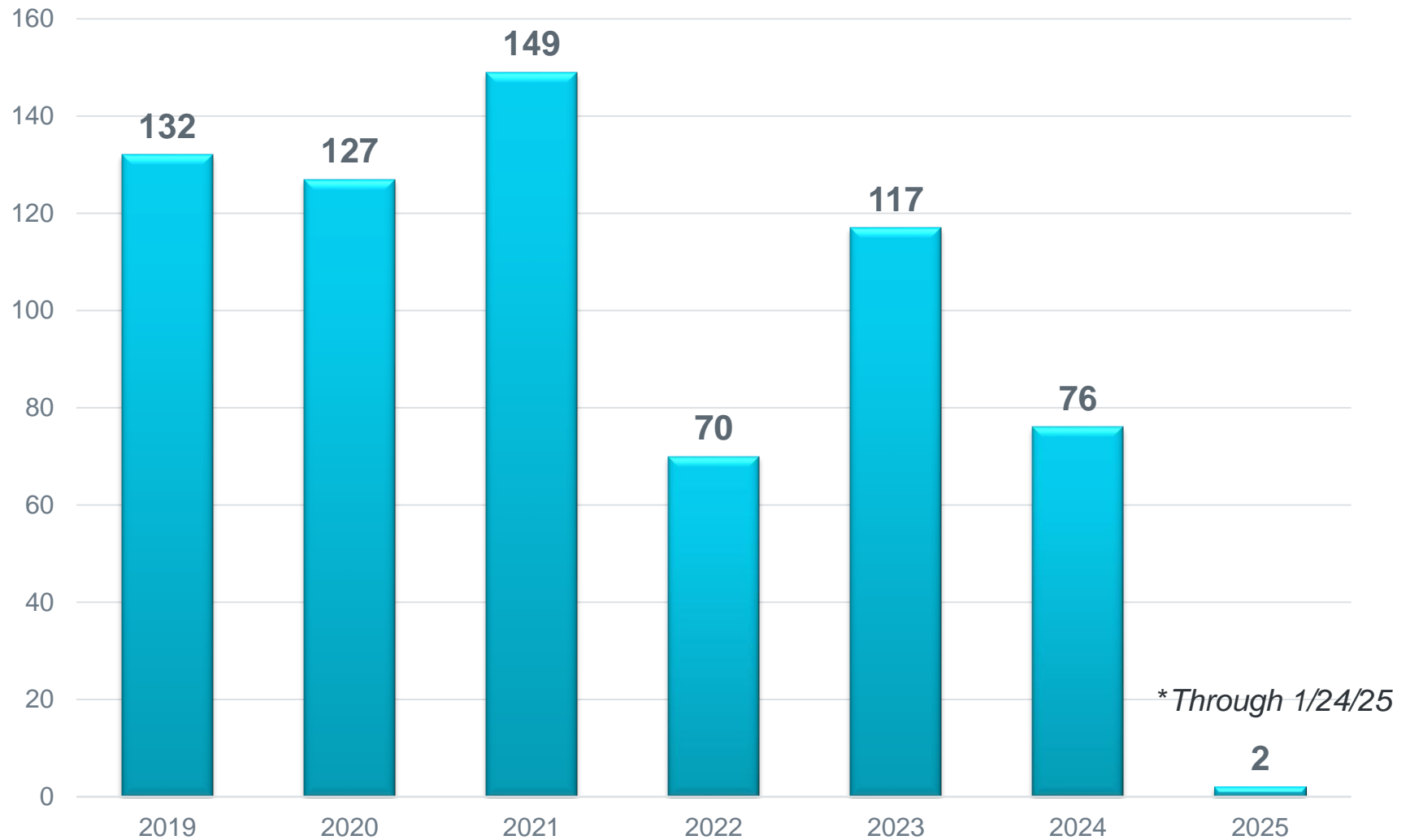
2025 Approved Revision Requests – Budgetary Impact

PUC Approval Date	Revision Request	Budgetary Impact
1/16/25	NPRR1239, Access to Market Information	\$50K - \$100K
1/16/25	NPRR1240, Access to Transmission Planning Information	\$40K - \$60K
1/16/25	NPRR1249, Publication of Shift Factors for All Active Transmission Constraints in the RTM	\$25K - \$45K
	TOTAL	~ \$115K – 205K

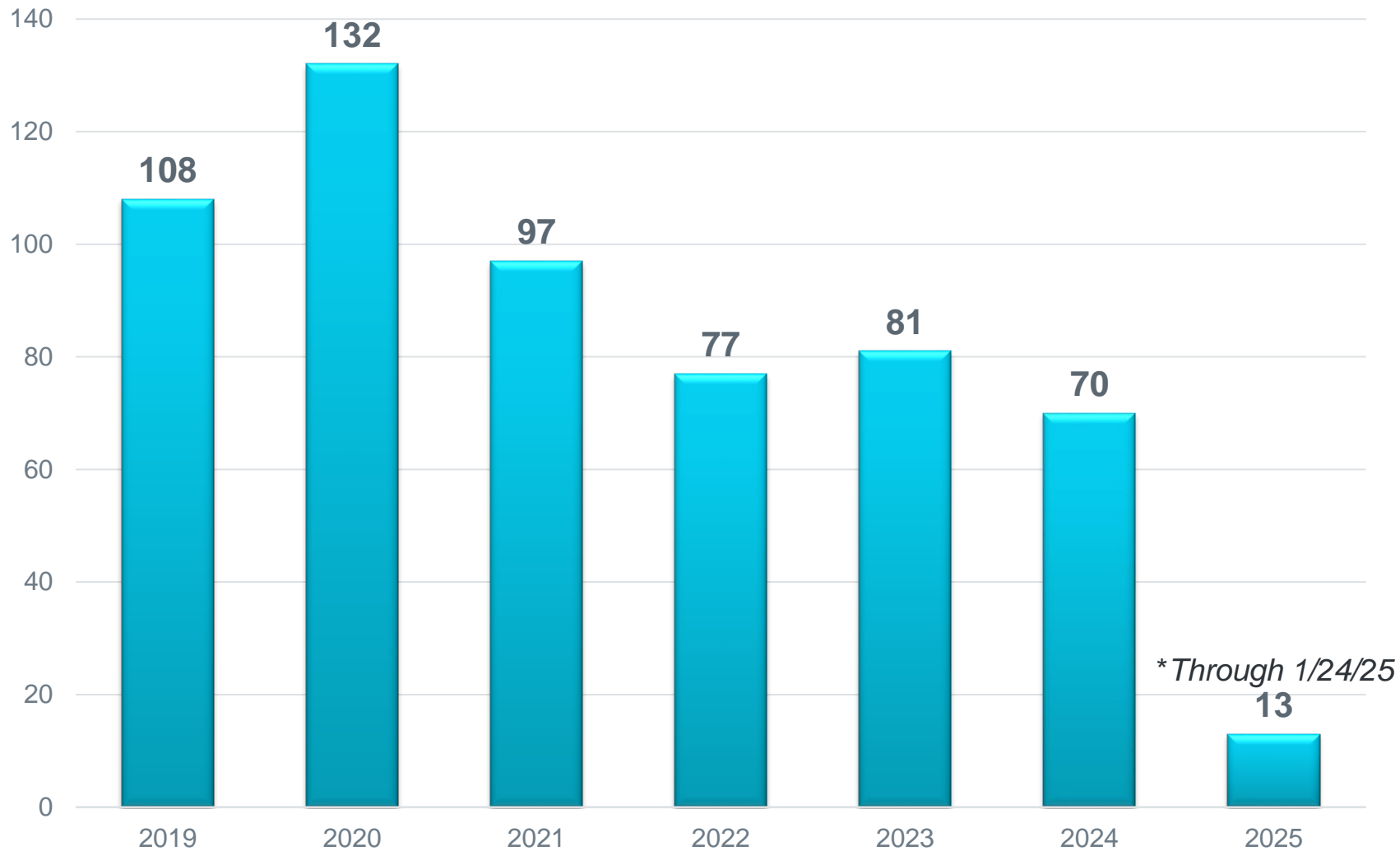
2025 Approved Revision Requests – Staffing Impact

PUC Approval Date	Revision Request	ERCOT Department	FTE Impact	Additional FTEs Required
1/16/25	NPRR1247, Incorporation of Congestion Cost Savings Test in Economic Evaluation of Transmission Projects	Economic Analysis & Long-Term Studie	2.0	2.0
Totals			2.0	2.0

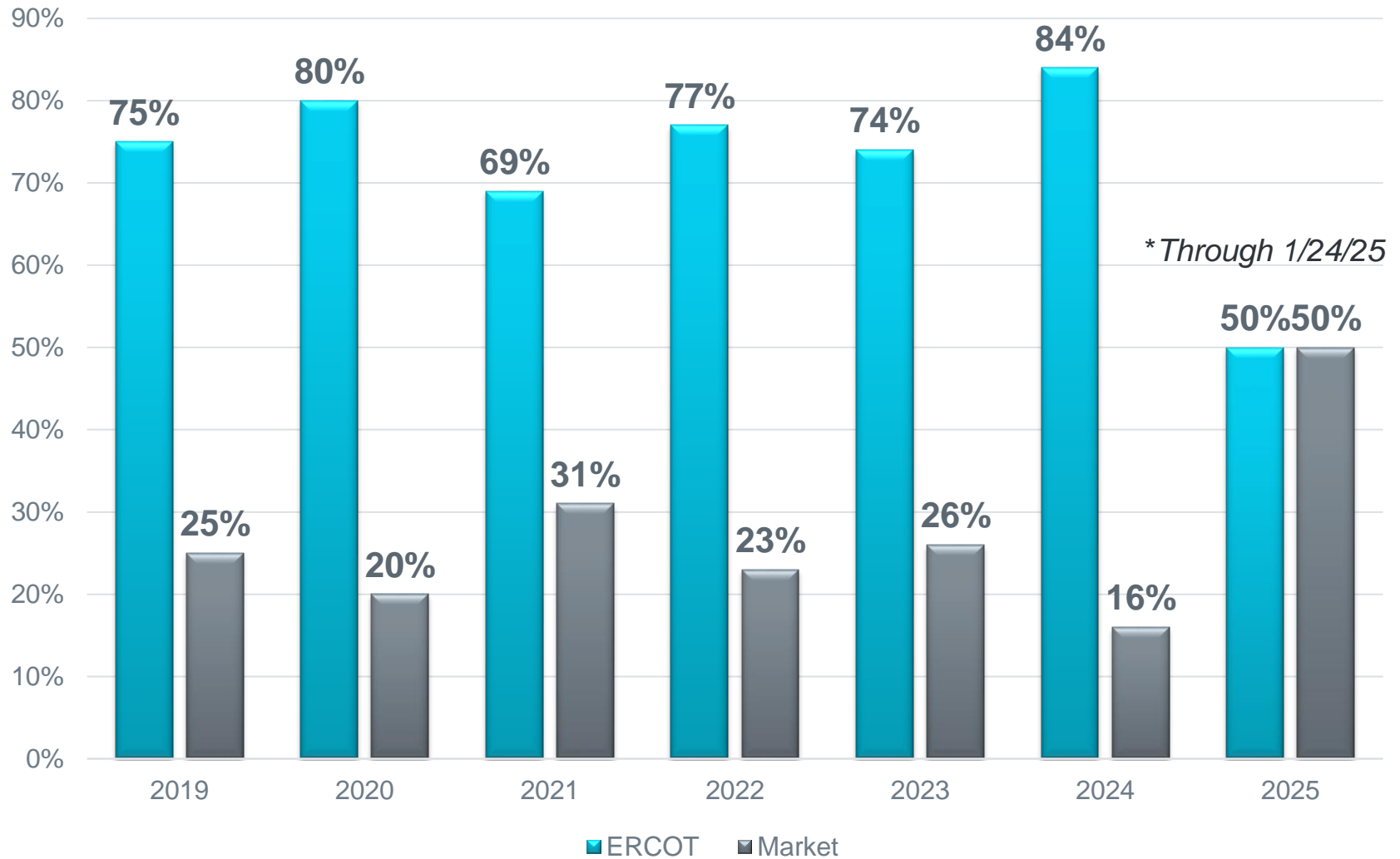
Statistics – New Revision Requests Submitted



Statistics – Approved Revision Requests



Statistics – Revision Request Sponsorship



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