|  |  |  |  |
| --- | --- | --- | --- |
| NOGRR Number | [274](https://www.ercot.com/mktrules/issues/NOGRR274) | NOGRR Title | Conform Nodal Operating Guide to Revisions Implemented for NPRR1217, Remove Verbal Dispatch Instruction (VDI) Requirement for Deployment and Recall of Load Resources and Emergency Response Service (ERS) Resources |
| Date of Decision | March 26, 2025 |
| Action | Recommended Approval |
| Timeline  | Urgent – The Nodal Operating Guide is out of synch with the Protocols since the implementation of Nodal Protocol Revision Request (NPRR) 1217, Remove Verbal Dispatch Instruction (VDI) Requirement for Deployment and Recall of Load Resources and Emergency Response Service (ERS) Resources on 10/1/2024  |
| Estimated Impacts | Cost/Budgetary: NoneProject Duration: No project required |
| Proposed Effective Date | The first of the month following Public Utility Commission of Texas (PUCT) approval |
| Nodal Operating Guide Sections Requiring Revision  | 4.5.3.1, General Procedures Prior to EEA Operations |
| Related Documents Requiring Revision/Related Revision Requests | None |
| Revision Description | This Nodal Operating Guide Revision Request (NOGRR) conforms the Nodal Operating Guide to Protocol changes made by NPRR1217. |
| 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 | With NPRR1217 being implemented on 10/1/24, there are now inconsistencies between the Protocols and the Nodal Operating Guide, and this NOGRR addresses this issue.  |
| ROS Decision | On 3/6/25, ROS voted unanimously to grant NOGRR274 Urgent status; to recommend approval of NOGRR274 as submitted; and to forward to TAC NOGRR274 and the 2/26/25 Impact Analysis. All Market Segments participated in the vote. |
| Summary of ROS Discussion | On 3/6/25, ERCOT Staff provided an overview of NOGRR274. |
| TAC Decision | On 3/26/25, TAC voted unanimously to recommend approval of NOGRR274 as recommended by ROS in the 3/6/25 ROS Report. All Market Segments participated in the vote. |
| Summary of TAC Discussion | On 3/26/25, 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) |
|  |  |
| **Opinions** |
| Credit Work Group Review | Not applicable |
| Independent Market Monitor Opinion | IMM has no opinion on NOGRR274. |
| ERCOT Opinion | ERCOT supports approval of NOGRR274. |
| ERCOT Market Impact Statement | ERCOT Staff has reviewed NOGRR274 and confirms the revisions appropriately conform the Nodal Operating Guide with the Protocol language implemented from NPRR1217. There are no impacts to the ERCOT market beyond those associated with NPRR1217. |

|  |
| --- |
| Sponsor |
| Name | Mark Patterson / Bryan Luker |
| E-mail Address | mark.patterson@ercot.com / bryan.luker@ercot.com |
| Company | ERCOT |
| Phone Number | 512-248-3912 / 512-248-3957 |
| Cell Number |  |
| Market Segment | Not applicable |

|  |
| --- |
| **Market Rules Staff Contact** |
| **Name** | Erin Wasik-Gutierrez |
| **E-Mail Address** | erin.wasik-gutierrez@ercot.com |
| **Phone Number** | 413-886-2474 |
|  |  |
| **Comments Received** |
| **Comment Author** | **Comment Summary** |
| None |  |

|  |
| --- |
| **Market Rules Notes** |

Please note that the following NOGRR(s) also propose revisions to Section 4.5.3.1:

* NOGRR265, Related to NPRR1238, Voluntary Registration of Loads with Curtailable Load Capabilities

|  |
| --- |
| Proposed Guide Language Revision |

4.5.3.1 General Procedures Prior to EEA Operations

(1) Prior to declaring EEA Level 1 detailed in Section 4.5.3.3, EEA Levels, ERCOT may perform the following operations consistent with Good Utility Practice:

(a) Provide Dispatch Instructions to QSEs for specific Resources to operate at an Emergency Base Point to maximize Resource deployment so as to increase Responsive Reserve (RRS) levels on other Resources;

(b) Commit specific available Resources as necessary that can respond in the timeframe of the emergency. Such commitments will be settled using the Hourly Reliability Unit Commitment (HRUC) process;

(c) Start Reliability Must-Run (RMR) Units available in the time frame of the emergency. RMR Units should be loaded to full capability;

(d) Utilize available Resources providing RRS, ERCOT Contingency Reserve Service (ECRS), and Non-Spinning Reserve (Non-Spin) services as required;

(e) Instruct TSPs and Distribution Service Providers (DSPs) or their agents to reduce Customer Load by using existing, in-service distribution voltage reduction measures if ERCOT determines that the implementation of these measures could help avoid entering into EEA and ERCOT does not expect to need to use these measures to reduce the amount of Load shedding that may be needed in EEA Level 3. 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; and

(f) ERCOT shall use the PRC and system frequency to determine the appropriate Emergency Notice and EEA levels.

(2) When PRC falls below 3,000 MW and is not projected to be recovered above 3,000 MW within 30 minutes following the deployment of Non-Spin, ERCOT may deploy available contracted Emergency Response Service (ERS)-10 and ERS-30 via an Extensible Markup Language (XML) message. The deployment time within the ERCOT XML deployment message shall represent the beginning of the ERS-10 and ERS-30 ramp periods.

(a) ERS-10 and ERS-30 may be deployed at any time in a Settlement Interval. ERS-10 and ERS-30 may be deployed either simultaneously or separately, and in any order, at the discretion of ERCOT operators.

(b) Upon deployment, QSEs shall instruct their ERS Resources in ERS-10 and ERS-30 to perform at contracted levels consistent with the criteria described in Section 8.1.3.1.4, Event Performance Criteria for Emergency Response Service Resources, until either ERCOT recalls the ERS-10 and ERS-30 deployment or the ERS-10 and ERS-30 Resources have reached their maximum deployment time.

(c) ERCOT shall notify QSEs of the recall of ERS-10 and ERS-30 via an XML message. The recall time within the ERCOT XML message shall represent the official notice of ERS-10 and ERS-30 recall.

(d) Upon recall, an ERS Resource shall return to a condition such that it is capable of meeting its ERS performance requirements as soon as practical, but no later than ten hours following the recall.

(3) When a Watch is issued for PRC below 3,000 MW and ERCOT expects system conditions to deteriorate to the extent that an EEA Level 2 or 3 may be experienced, ERCOT shall evaluate constraints active in SCED and determine which constraints have the potential to limit generation output.

(a) Upon identification of such constraints, ERCOT shall coordinate with the TSPs that own or operate the overloaded Transmission Facilities associated with those constraints, as well as the Resource Entities whose generation output may be limited, to determine whether:

|  |
| --- |
| ***[NOGRR177: Replace paragraph (a) above with the following upon system implementation of NPRR857:]***(a) Upon identification of such constraints, ERCOT shall coordinate with the TSPs and DCTOs that own or operate the overloaded Transmission Facilities associated with those constraints, as well as the Resource Entities whose generation output may be limited, to determine whether: |

(i) A 15-Minute Rating is available that allows for additional transmission capacity for use in congestion management, if an EEA Level 2 or 3 is declared, and post-contingency actions can be taken within 15 minutes to return the flow to within the Emergency Rating. Such actions may include, but are not limited to, reducing the generation that increased output as a result of enforcing the 15-Minute Rating rather than the Emergency Rating;

(ii) Post-contingency loading of the Transmission Facilities is expected to be at or below Normal Rating within two hours; or

(iii) Additional transmission capacity could allow for additional output from a limited Generation Resource by taking one of the following actions:

1. Restoring Transmission Elements that are out of service;
2. Reconfiguring the transmission system; or
3. Making adjustments to phase angle regulator tap positions.

If ERCOT determines that one of the above-mentioned actions allows for additional output from a limited Generation Resource, ERCOT may instruct the TSPs to take the action(s) during the Advisory to allow for additional output from the limited Generation Resource.

(b) ERCOT shall also coordinate with TSPs who own and operate the Transmission Facilities associated with the double-circuit contingencies for the constraints identified above to determine whether the double-circuit failures are at a high risk of occurring due to system conditions, which may include: severe weather conditions forecasted by ERCOT in the vicinity of the double-circuit, weather conditions that indicate a high risk of insulator flashover on the double-circuit, repeated Forced Outages of the individual circuits that are part of the double-circuit in the preceding 48 hours, or fire in progress in the right of way of the double-circuit.

|  |
| --- |
| ***[NOGRR177: Replace paragraph (b) above with the following upon system implementation of NPRR857:]***(b) ERCOT shall also coordinate with TSPs and DCTOs who own and operate the Transmission Facilities associated with the double-circuit contingencies for the constraints identified above to determine whether the double-circuit failures are at a high risk of occurring due to system conditions, which may include: severe weather conditions forecasted by ERCOT in the vicinity of the double-circuit, weather conditions that indicate a high risk of insulator flashover on the double-circuit, repeated Forced Outages of the individual circuits that are part of the double-circuit in the preceding 48 hours, or fire in progress in the right of way of the double-circuit.  |

(c) The actions detailed in this Section shall be supplemental to the development and maintenance of Constraint Management Plans (CMPs) as otherwise directed by the Protocols or Operating Guides.

(4) When a Watch is issued for PRC below 3,000 MW, QSEs shall suspend any ongoing ERCOT-required Resource performance testing.