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| NPRR Number | [1235](https://www.ercot.com/mktrules/issues/NPRR1235) | NPRR Title | Dispatchable Reliability Reserve Service as a Stand-Alone Ancillary Service |
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| Date | | Aug 23, 2024 | |
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| Submitter’s Information | | | |
| Name | | Ryan King | |
| E-mail Address | | [ryan.king@ercot.com](mailto:ryan.king@ercot.com) | |
| Company | | ERCOT | |
| Phone Number | | 512-944-7706 | |
| Cell Number | |  | |
| Market Segment | | Not applicable | |

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| Comments |

ERCOT offers the following comments with respect to Nodal Protocol Revision Request (NPRR) 1235. This NPRR has been developed pursuant to Public Utility Regulatory Act (PURA) § 39.159(d) which requires ERCOT “to develop and implement an ancillary services program to procure dispatchable reliability reserve services on a day-ahead and real-time basis to account for market uncertainty.”

As outlined during the June 3, 2024 Dispatchable Reliability Reserve Service ([DRRS) Workshop](https://www.ercot.com/calendar/06032024-Dispatchable-Reliability-Reserve-Service) III and subsequently discussed at the [June](https://www.ercot.com/calendar/06132024-PRS-Meeting) Protocol Revision Subcommittee (PRS) meeting, the [July](https://www.ercot.com/calendar/07102024-WMS-Meeting-_-Webex) and [August](https://www.ercot.com/calendar/08072024-WMS-Meeting) Wholesale Market Subcommittee (WMS) meetings and the July Reliability and Operations Subcommittee (ROS) and Wholesale Market Working Group (WMWG) meetings respectively, ERCOT has proposed a phased approach to the implementation of DRRS. NPRR1235 provides for Protocol revisions to allow eligible Off-Line Resources to provide this service.

The requirements in NPRR 1235 mean that Energy Storage Resources (ESRs) would not be eligible to provide this service. Expanding the scope of DRRS to enable the participation of ESRs raises additional requirements which require further consideration and discussion with stakeholders. Several stakeholders have recommended changes to NPRR1235 and/or expressed the need for additional clarity around when and how ESRs will be eligible to provide this service. ERCOT appreciates the desire for additional certainty and will aim to present a separate NPRR that includes provisions for ESR participation before the end of 2024. This will allow ERCOT and stakeholders to collaborate and focus on issues particular to the participation of ESRs in DRRS while allowing NPRR1235 to continue through the stakeholder approvals process.

On the basis of this commitment, ERCOT requests that remaining discussion on NPRR1235 in the stakeholder process focus on the mechanics and requirements as proposed in the version submitted to PRS on May 29, 2024 while comments and suggested edits related to an expanded scope be reserved for discussion in the subsequent NPRR to be presented later this year.

ERCOT looks forward to further discussion at the September 12, 2024 PRS meeting.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None