



Item 13: High-Impact Policy Discussions in the Stakeholder Process

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ERCOT Public

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Revision Request Status Update: Overview

- **Purpose**

Provide an update on key policy issues currently in the stakeholder process

- **Voting Items / Requests**

No action is requested of the ERCOT Board; for discussion only

- **Key Takeaway(s)**

- High-impact policy issues expected to be in front of the Board in 2025
 - Real-Time Co-Optimization (RTC),
 - Dispatchable Reliability Reserve Service (DRRS)
 - Large Loads

High-Impact Policy Issues in the Stakeholder Process

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

- **RTC+B Policy Parameters and Ancillary Services Demand Curves (ASDCs)**
 - Key revision requests related to RTC technical parameters and ASDC design are up for Board consideration in April.
 - › [NPRR1268](#), RTC – Modification of Ancillary Service Demand Curves
 - › [NPRR1269](#), RTC+B Three Parameters Policy Issues
 - › [NPRR1270](#), Additional Revisions Required for Implementation of RTC
- **Additional Revisions Required for Implementation**
 - Discussions are ongoing at Real-Time Co-optimization plus Batteries Task Force (RTCBTF) regarding the final policy decisions anticipated for consideration before RTC+B go-live.
 - › The Ancillary Service duration requirements (State of Charge) parameter was decoupled from NPRR 1269 for consideration as a separate revision request. ERCOT is engaging with stakeholders and expects to sponsor an NPRR for consideration at the June 2025 Board.
 - › Based on analysis, ERCOT anticipates filing a NPRR to inform appropriate minimum duration requirements for each Ancillary Service type under the RTC paradigm.

• Key Takeaway

- ERCOT is focused on completing Revision Requests for policy issues. Market Rules will begin evaluating RTC related gray box language in anticipation of the December 5, 2025 go-live.

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)
 - › ERCOT hosted a [DRRS Workshop IV](#) in February 2025. The intent is to host a series of workshops throughout the year to refine design concepts and bring NPRR language back to the stakeholder processes.
- 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 1,000 MW 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: at Board for consideration
 - [PGRR115](#), Related to NPRR1234, Interconnection Requirements for Large Loads and Modeling Standards for Loads 25 MW or Greater
 - › Posted May 28, 2024
 - › Current Status: at Board for consideration
- **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

High-Impact Policy Issues in the Stakeholder Process

Firm Fuel Supply Service (FFSS)

- In January 2025, the PUC provided guidance to ERCOT regarding an expansion of FFSS eligible resources for the Winter 2025-2026 contract period (P-56000).
 - The PUC expressed support for amending the definition for Qualifying Pipeline as recommended by TAC in May 2023 under [NPRR 1169](#).
 - PUC Staff has asked for additional guidance on whether there is merit to ensuring that some amount of onsite fuel oil resources are procured to provide FFSS.
- [NPRR1275](#), **Expansion of Qualifying Pipeline Definition for Firm Fuel Supply Service in Phase 3**
 - ERCOT sponsored revision request with a goal of approval by the PUC prior to the upcoming FFSS Request for Proposal (RFP) issuance in August 2025.
 - ***Posted February 25, 2025***
 - ***Current Status: pending at PRS for Impact Analysis consideration***
 - › Vistra filed comments regarding the need to revisit the single FFSS clearing price and better reflect the value of different product offerings. Vistra recommended a separate clearing process and price for onsite vs. offsite storage.
 - › On March 12, PRS voted to approve NPRR1275 as submitted. There was one opposing vote in the Independent Generator Segment (Vistra)

• Key Takeaway

- The PUC is expected to provide additional guidance regarding desired procurement quantities, procurement mechanisms, and the desired level of reliability in advance of the upcoming FFSS contract period .

High-Impact Policy Issues in the Stakeholder Process

Renewable Energy Credit (REC) Program

- PURA § 39.9113 as adopted by H.B. 1500 (88th Leg.) requires ERCOT to maintain an accreditation and banking system to award and track RECs on a voluntary basis.
 - ERCOT sponsored [NPRR 1218](#) to codify the regulatory changes.
 - Trading program requirements established in [16 TAC § 25.173](#), *Renewable Energy Credit Program*. The rule provides ERCOT the option to assign additional attributes to RECs, but the PUC determined that creating new types of credits, or authorizing ERCOT to do so, was beyond the scope of the rulemaking proceeding.
- **[NPRR1264](#), Creation of a New Energy Attribute Certificate Program**
 - Introduces the concept of Energy Attribute Certificates (EACs) that could be earned by any generator, regardless of fuel type, and makes RECs a subcategory of EACs.
 - EACs would allow all Generation Resources, including energy storage, nuclear, and other generators, to add specificity to its attributes and participate in an EAC trading program.
 - Creates a third-party certification program that would allow Resources to use a third-party to provide documentation to ERCOT regarding how they met certain operational characteristics.
 - Adds a robust programmatic interface to EAC trading and accounting and allows ERCOT to contract a third-party administrator for the program.
 - › *Posted: December 19, 2024 (Texas Energy Buyers Alliance (TEBA)/Goff Policy)*
 - › *Current Status: tabled at PRS, referred issue to WMS*
 - › *See Related: COPMGRR 051, NOGRR 273, PGRR 123, RRGRR 038, RMGRR 182, SMOGRR 031, VCMRR 043*

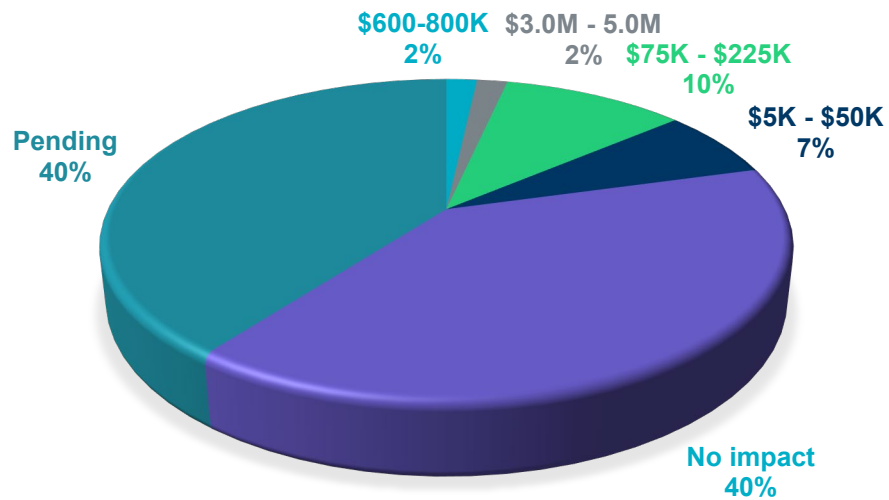
• Key Takeaway

- ERCOT has requested comments from interested parties on certain policy questions to better understand the business justification for NPRR1264.

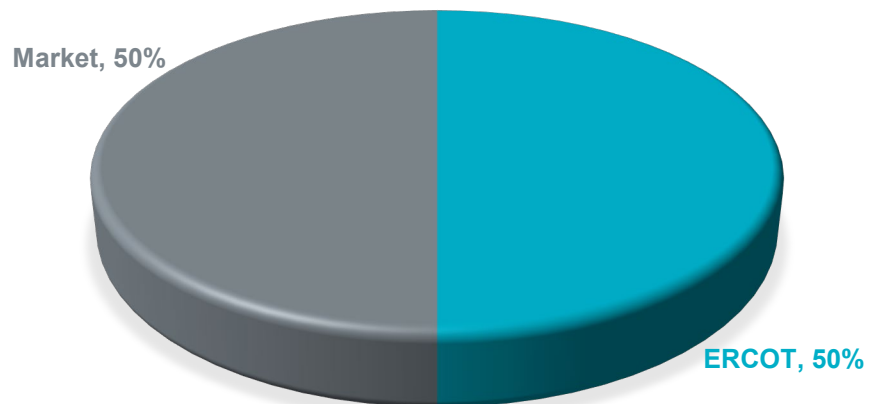
Appendix

58 Revision Requests in Process

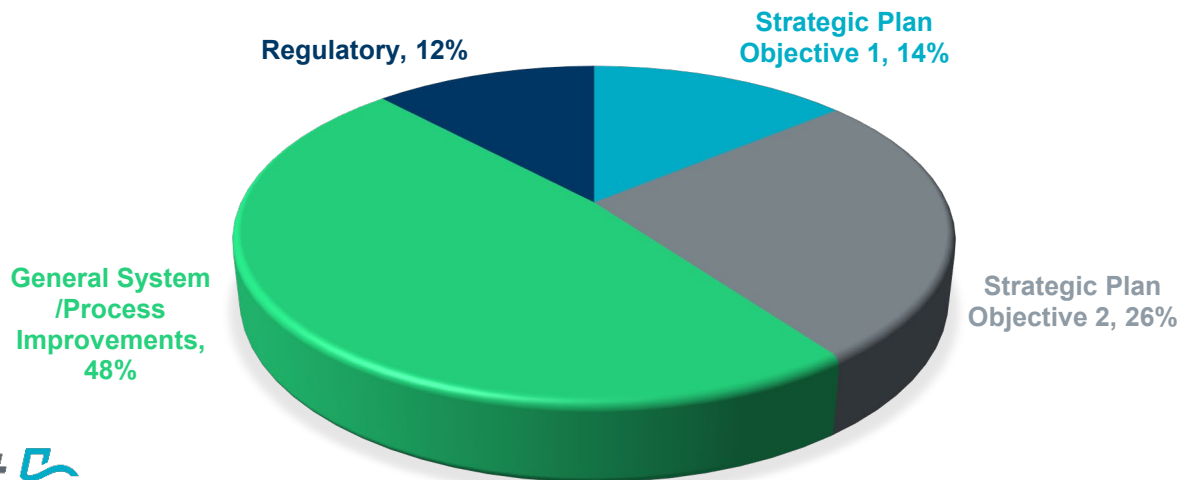
BUDGETARY IMPACTS



SPONSORSHIP

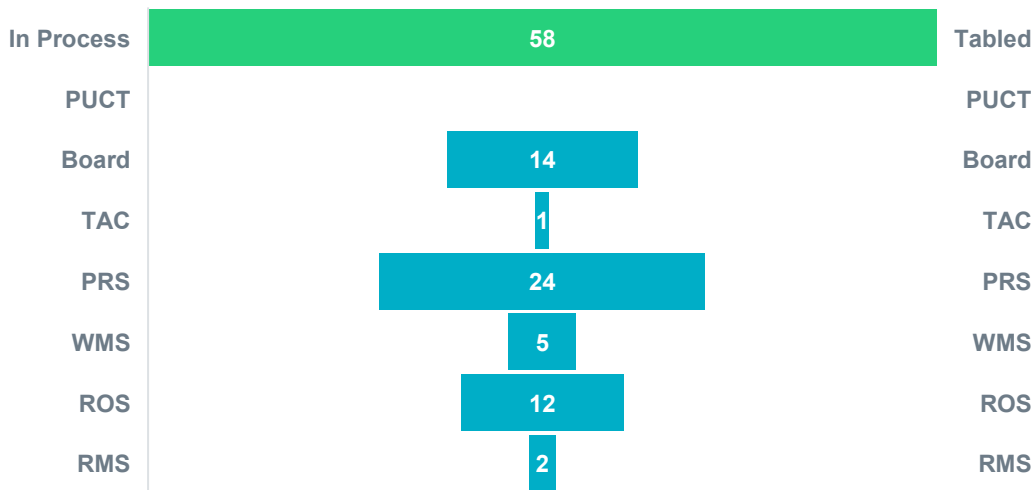


REASON FOR REVISION

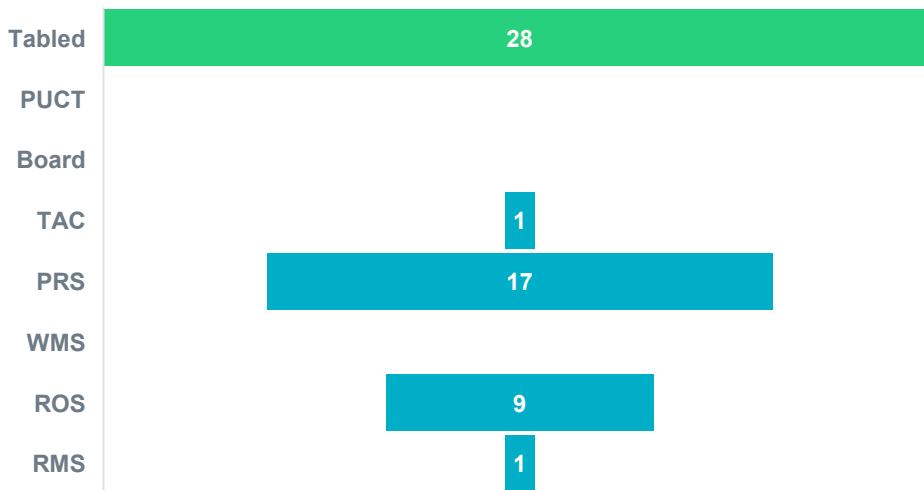


58 Revision Requests in Process

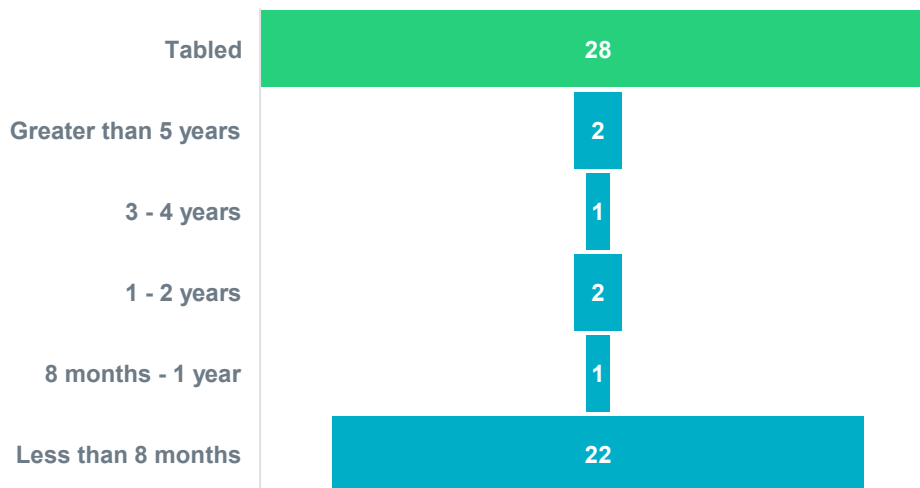
LOCATION OF REVISION REQUESTS



LOCATION OF TABLED REVISION REQUESTS



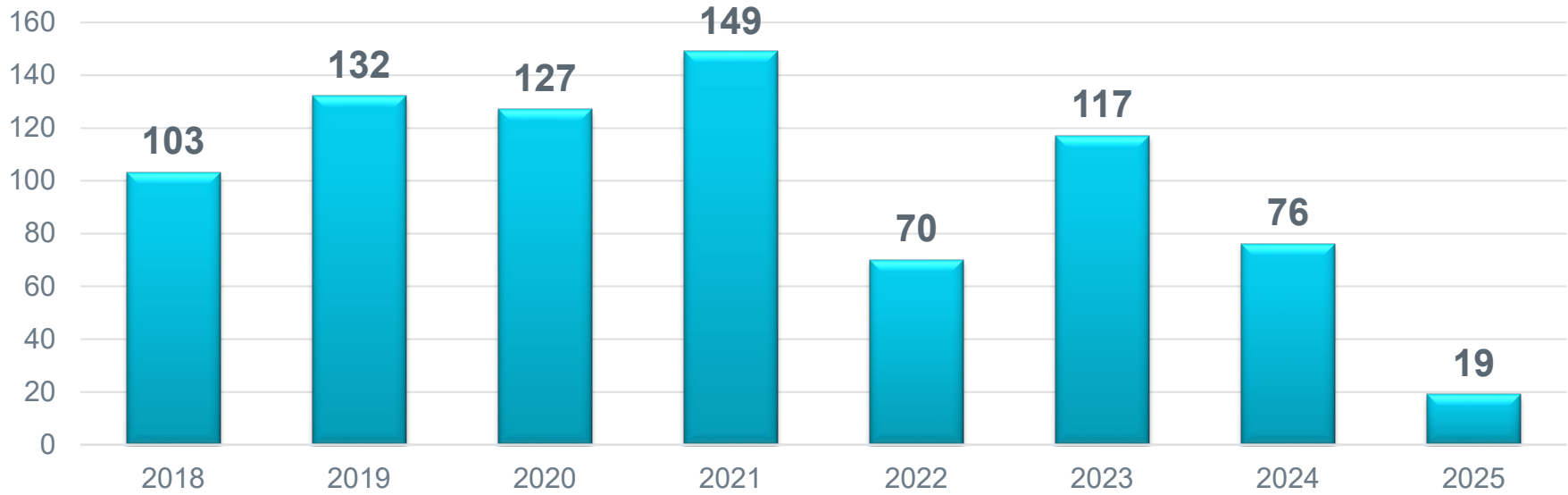
LENGTH TABLED



Aging Revision Requests in Process (Tabled for over 8 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.
PGRR073, 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 presented at the December PRS on an online “request form” under construction for 2025 to facilitate these sorts of dashboard/website requests
NPRR1202, Refundable Deposits for Large Load Interconnection Studies [Lancium]	1 – 2 years (11/9/23)	Tabled at PRS. Referred issue to WMS. WMS discussed but ultimately had no recommendation. ERCOT SMEs support moving forward with NPRR1234/PGRR114 (before the April Board) to set the initial fee for a Large Load Interconnection Study (LLIS) and revisit ALL fees (generation and load) in a separate Revision Request. Analysis of those potential fee changes is underway at ERCOT and expected to wrap up in April.
NPRR1235, Dispatchable Reliability Reserve Service as a Stand-Alone Ancillary Service [ERCOT]	8 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.

Statistics – New Revision Requests Submitted



New Revision Requests submitted since February Board:

- [NPRR1272](#), Voltage Support at Private Use Networks
- [PGRR124](#), ESR Maintenance Exception to Modifications
- [NPRR1273](#), Appropriate Accounting for ESRs in PRC Calculation
- [NPRR1274](#), RPG Estimated Capital Cost Thresholds of Proposed Transmission Projects
- [NPRR1275](#), Expansion of Qualifying Pipeline Definition for Firm Fuel Supply Service in Phase 3
- [NOGRR274](#), 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,
- [NOGRR275](#), Eliminate Scheduling Center Requirements for QSEs That Are Not WAN Participants
- [NPRR1276](#), Move OBD to Section 22 – Emergency Response Service Procurement Methodology
- [OBDRR054](#), TDSP(s) Pre-Production Verification Testing
- [NPRR1277](#), Revisions to EAL Formula
- [SMOGRR032](#), Move OBD to Section 12 – TDSP Access to EPS Metering Facility Notification Form
- [SMOGRR033](#), Move OBD to Section 12 – TDSP Cutover Form for EPS Metering Points
- [PGRR125](#), Update of LSIPA Compliance Attestation

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
LFLT	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 Co-optimization 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