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| NPRR Number | [1255](https://www.ercot.com/mktrules/issues/NPRR1255) | NPRR Title | Introduction of Mitigation of ESRs |
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| Date | April 3, 2025 |
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| Submitter’s Information |
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| Market Segment | Independent Generator  |

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| Comments |

Jupiter Power LLC (“Jupiter Power” or “Jupiter”) appreciates this opportunity to comment ahead of the April 9, 2025, Protocol Revision Subcommittee (PRS) Meeting and submits these comments as a follow on to ERCOT’s April 2nd comments.

Jupiter Power agrees with the “just-in-time” mitigation framework introduced by ERCOT in Nodal Protocol Revision Request (NPRR) 1255 and appreciates the thoughtful evaluation and considerations that ultimately have led to this approach. We further appreciate ERCOT’s willingness to refine the initially proposed NPRR in their April 2nd comments, to account for circumstances in which the available stored energy of a Resource over the next hour is less than 25%.

However, we request that PRS refer NPRR1255 to the Wholesale Market Subcommittee (WMS) for consideration of the narrow issue of whether a 25% threshold is the appropriate “filter”. Although the Congestion Management Working Group (CMWG) reviewed concepts for Energy Storage Resource (ESR) mitigation last year, the new proposed 25% threshold has not been reviewed by stakeholders.

The introduction of mitigated offers for ESRs introduces challenges that are specific to ESRs. As ESRs are always deemed to have “On-Line” status, Energy Offer Curves (“EOC”) are the only tool that ERS operators have to manage their State of Charge (SOC) for their Day-Ahead commitments. For example, this means that ESRs use their EOC in order to preserve SOC for their Ancillary Service responsibilities, and that an administrative lowering of that EOC might prevent preservation of an SOC for an Ancillary Service responsibility. Jupiter Power’s specific concern with NPRR1255 is that an ESR may be dispatched in such a way that it does not maintain the necessary SOC for its Day-Ahead obligations. In that circumstance, in order to meet its obligations, an ESR would have to make itself whole by charging, to recover SOC that was depleted through an administrative pricing action. A mitigated offer price for ESRs essentially removes control over the only tool ESRs have to manage SOC for their obligations and responsibilities to consumers, and instead delegates that to an administrative price mechanism. Additionally, if an ESR is subject to a mitigated offer curve to solve a congestion issue, but immediately thereafter would need to charge in order to meet an upcoming Day-Ahead obligation, charging the ESR may further exacerbate the congestion that NPRR1255 aims to relieve. In this context, Jupiter Power would like to consider whether NPRR1255 balances the need for ESR mitigation with minimizing circumstances where there may not be operational benefit to administratively deploying a battery in such a way that it cannot meet its day ahead obligations to consumers or to ERCOT.

Jupiter Power requests that PRS refer NPRR1255 to WMS with a request to evaluate the 25% “filter” in the context of alleviating specific outcomes where application of NPRR1255 would affect an ESRs ability to manage its SOC and would need to immediately charge after being mitigated to make itself whole to meet Day-Ahead responsibilities.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None