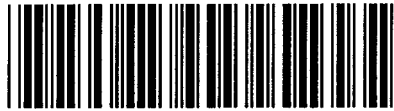


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# *Public Utility Commission of Texas*

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## **Memorandum**

TO: Chairman Rebecca Klein  
Commissioner Brett Perlman

FROM: David Hurlbut and Julie Gauldin, Market Oversight Division

DATE: September 11, 2002

RE: Application of Proposed Competitive Sufficiency Test to ERCOT Data  
Docket No. 24770, Report of the Electric Reliability Council of Texas (ERCOT)  
to the PUCT regarding Implementation of the ERCOT Protocols

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Attached are the results of our empirical study of how MOD's proposed Competitive Sufficiency Test would have affected ERCOT's ancillary service markets over the past year. We examined 366 days of historical data (August 1, 2001 through July 31, 2002) for a total of 8,784 hourly intervals. ERCOT staff helped review our database queries and analysis for errors. We plan to file a more detailed report next week.

cc: Central Records; all parties via email and first class mail

## Application of MOD's Proposed Competitive Sufficiency Test

August 1, 2001 through July 31, 2002

8,784 hourly intervals tested

	<i>Number of intervals</i>	<i>% of all intervals</i>
<b>Regulation Down</b>		
Failed intervals in 2001 (from Aug. 1)	263	7.2%
Failed intervals in 2002 (thru July 31)	2	<0.1%
Mitigation (failed intervals where Limit<MCP)	1	<0.1%
<b>Regulation Up</b>		
Failed intervals in 2001 (from Aug. 1)	246	6.7%
Failed intervals in 2002 (thru July 31)	0	0.0%
Mitigation (failed intervals where Limit<MCP)	0	0.0%
<b>Responsive Reserves</b>		
Failed intervals in 2001 (from Aug. 1)	197	5.4%
Failed intervals in 2002 (thru July 31)	74	1.4%
Mitigation (failed intervals where Limit<MCP)	3	<0.1%
<b>Non-Spinning Reserves</b>		
Failed intervals in 2001 (from Aug. 1)	9	0.2%
Failed intervals in 2002 (thru July 31)	10	0.2%
Mitigation (failed intervals where Limit<MCP)	1	<0.1%