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PROJECT NO. 38470

CONFIDENTIALITY OF ELECTRIC § PUBLIC UTILITY COMMISSION
GENERATION INFORMATION IN §
THE ELECTRIC RELIABILITY § OF TEXAS
COUNCIL OF TEXAS REGION §

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S COMMENTS
CONCERNING AMENDMENT TO P.U.C. SUBSTANTITVE RULE § 25.505**

COMES NOW, Electric Reliability Council of Texas, Inc. (ERCOT), and provides comments to the proposed amendment to P.U.C. Substantive Rule § 25.505, *Resource Adequacy in the Electric Reliability Council of Texas Power Region*, as published in the Texas Register on September 3, 2010, relating to clarification of the timing for release of transmission system information contained in the ERCOT State Estimator Report.

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ERCOT files its comments as a resource for parties and the Commission. At this time, ERCOT takes no position on the policy issue of when to disclose certain State Estimator data. The comments below are intended to address the Nodal system impacts as a result of the proposed amendment.

I.

A. Nodal System Impacts Associated with the Proposed Amendment.

The proposed amendment has a direct Nodal system impact on ERCOT in relation to the two State Estimator reports that would be produced under Nodal Protocol Section 6.5.7.1.13, *Data Inputs and Outputs for the Real-Time Sequence and SCED*. Specifically, Section 6.5.7.1.13(4), in part, of the Nodal Protocols states the following:¹

(4) Every hour, ERCOT shall post on the MIS Secure Area the following information:

¹ The subparagraphs noted herein are the subject of Nodal Protocol Revision Request (NPRR) 209, *Data Posting Changes to Comply with P.U.C. Subst. R. 25.505*. The Technical Advisory Committee (TAC) has tabled NPRR209 pending Commission resolution of this rulemaking.

....

(b) Transmission flows and voltages from the State Estimator, excluding transmission flows and voltages for Private Use Networks;

....

(d) Transformer flows, voltages and tap positions from the State Estimator, excluding transformer flows, voltages and tap position for Private Use Networks;

....

The Protocol section requires that ERCOT produce *every hour* two State Estimator reports: (a) Transmission flows and voltages from the State Estimator and; (b) Transformer flows, voltages and tap position from the State Estimator. The ERCOT Energy Management Systems (EMS) is the source system that holds the data for these two State Estimator reports. The data from the EMS system is made available to the Current Day Reports (CDR) system. The CDR system is designed to post near *real time* records (*i.e.*, hourly snapshots) and therefore is the system currently utilized to fulfill this Protocol requirement. The CDR system does not have the capability to store and post data at a designated time beyond near real time.

The proposed amendment indicates that ERCOT will post “the State Estimator Report . . . 14 days after the day for which the data was accumulated.” Thus, the proposed amendment changes the posting requirement from “every hour” to “14 days” after the applicable Operating Day. In order to fulfill a posting requirement that is beyond near real time, ERCOT would need to utilize its Information Services Master (ISM) data archiving system instead of the CDR system. Therefore, ERCOT would have to make the following Nodal system changes:

- (1) System modifications to retire the publication of existing Transmission and Transformers flows information from the CDR system.

- (2) Replicate the Transmission and Transformers flows data from the EMS system into the ISM system. Replication ensures that the data is stored for long term and provides the ability to post data to the Market Information System (MIS) at a later date.
- (3) Write a program (software code) in the ISM system which will assemble the information stored in ISM and post it at the appropriate time.
- (4) Develop this program in a manner such that it can post the data after holding it anywhere from 2 days to 60 days after the applicable Operating Day.²

The two State Estimator reports would still contain the same level of information as originally intended in the hourly posting reports but would instead contain a single Operating Day report that includes twenty-four (24) hourly snapshots in each report, accounting for Daylight Savings Time (DST) where appropriate. In summary, the proposed amendment would require ERCOT to modify the following Nodal systems: CDR and ISM. ERCOT believes that the initial cost/budgetary impact is less than \$50,000.00 and can be absorbed into the Nodal Program budget without use of contingency funding.

B. ERCOT's Timeline to Implement the Proposed Amendment.

As with any proposed system change, ERCOT would need to accomplish the following tasks: perform technical analysis, develop business requirements and code, deploy, test and execute the extract/report. Although ERCOT has begun to scope the potential Nodal system changes as a result of the proposed amendment, the timing of the Commission's decision in this rulemaking will determine whether ERCOT is able to implement the necessary changes by Nodal go-live (*i.e.*, December 1, 2010). If the Commission makes a final decision on this rulemaking (regardless of whether the posting requirement is two, fourteen or sixty days) by the end of October 2010, then ERCOT will be able to implement the Nodal system changes by Nodal go-live.

² The decision to code the program in such a way in which ERCOT would have the flexibility to post the State Estimator data between two (2) days and sixty (60) days after the applicable Operating Day is consistent with the expiration of confidentiality provisions of Protected Information under Section 1.3.1.1, *Items Considered Protected Information*, of the ERCOT Protocols. Therefore, if the Commission chooses any posting requirement within that range, ERCOT would be able to comply based upon the design of the Nodal system changes.

For example, if the Commission approved the proposed amendment as-is with a fourteen (14) day posting requirement, then the first day in which ERCOT would be obligated to post the two State Estimator reports would be December 15, 2010 (*i.e.*, the posting date for State Estimator data on the first Operating Day, December 1, 2010).

Alternatively, if the Commission does not make a final decision on the rulemaking until after October 2010, then ERCOT's ability to implement the Nodal system changes by Nodal go-live is contingent upon: (1) the date of the Commission's decision; and (2) the final posting requirement approved in the rulemaking. For example, if the Commission approved the amendment in late November 2010 and the amendment required ERCOT to post the two State Estimator reports two (2) days after the applicable Operating Day, it is unlikely that ERCOT would be able to complete the Nodal system changes (including testing) and post the State Estimator reports by December 3, 2010 (*i.e.*, the posting date for State Estimator data on Operating Day December 1, 2010). On the other hand, if the amendment required a posting time period longer than that in the proposed amendment (*e.g.*, a sixty day posting requirement), then ERCOT could complete the necessary Nodal system changes and testing in time for the due date of the first Nodal post-go-live report, which would not be until January 30, 2011. In all posting requirement scenarios, ERCOT will work expeditiously to accomplish the Commission's directive and implement the Nodal system changes as soon as possible.

II.

ERCOT respectfully requests that the Commission take into consideration the comments stated above, and is prepared to provide additional information at the Commission's request.

Respectfully submitted,

By: Chad V. Seely
Chad V. Seely
Senior Corporate Counsel
cseely@ercot.com
Texas Bar No. 24037466
(512) 225-7035 (Telephone)
(512) 225-7079 (Facsimile)

ERCOT
7620 Metro Center Drive
Austin, Texas 78744

ATTORNEY FOR ELECTRIC RELIABILITY
COUNCIL OF TEXAS, INC.