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OPEN MEETING COVER SHEET

MEMORANDUM AND PROPOSAL FOR PUBLICATION

MEETING DATE: October 7, 2021

DATE DELIVERED: October 6, 2021

AGENDA ITEM NO.: 13

CAPTION: Project No. 52307 – Review of Rules
Adopted by the Independent Organization in
Calendar Year 2021

DESCRIPTION: Discussion and Possible Action

Public Utility Commission of Texas

Memorandum

TO: Chairman Peter Lake
Commissioner Will McAdams
Commissioner Lori Cobos
Commissioner Jimmy Glotfelty

FROM: Rebecca Zerwas, Market Analysis

DATE: October 6, 2021

RE: October 7, 2021 Open Meeting – Item No. 13
Project No. 52307 – *Review of Rules Adopted by the Independent Organization in Calendar Year 2021 (Discussion and possible action)*

Senate Bill (SB) 2 (87th Legislature, Regular Session) requires both the Commission and the Electric Reliability Council of Texas (ERCOT) to establish processes for Commission approval of any rules or protocols adopted under authority delegated from the Commission to the independent organization. Commission Staff will utilize Project No. 52307, *Review of Rules Adopted by the Independent Organization in Calendar Year 2021*, to facilitate this review and approval. Staff continues to work with ERCOT on amendments to the revision request approval process in anticipation of Project No. 52301, *ERCOT Governance and Related Issues*, and a full implementation of SB2.

Since the Commission adopted an order approving the last set of ERCOT rules at the August 19, 2021 Open Meeting, the Technical Advisory Committee (TAC) has met twice and passed three additional rules through the stakeholder process. These include two Nodal Operating Guide Revision Requests (NOGRRs) and a Retail Market Guide Revision Request (RMGRR). These matters are now pending at the Commission prior to ERCOT implementation.

First, Staff requests consideration of two matters approved by TAC at its August 27, 2021 meeting:

- RMGRR167, *Switch Hold Removal Documentation Clarification*. Staff recommends approval to specify the documentation options available to customers and provide efficiencies in the retail market.
- NOGRR227, *Add Phasor Measurement Recording Equipment Location for Main Power Transformer for Intermittent Renewable Resource (IRR)*. Staff recommends approval to better reflect the operational realities of IRRs and allow the measurement to be made at the main power transformer level for all resources under that transformer.

Included for your review are the TAC Report and ERCOT Impact Analysis. These documents are intended to provide a comprehensive overview describing the revisions, including ERCOT's market impact statement.

Staff also requests consideration of NOGRR223, *Add Phasor Measurement Recording Equipment Requirement to Modified Generating Facilities in Interconnection Process*, as approved by TAC at its September 29, 2021 meeting. Staff recommends approval in support of the added reliability provided by expanding phasor measurement equipment to certain existing resources seeking to modify a generator or storage device over 20 MVA. Included for your review are the TAC Report and ERCOT Impact Analysis for NOGRR223. These documents are intended to provide a comprehensive overview describing the NOGRR, including ERCOT's market impact statement.

Please find attached a proposed order for your consideration consistent with Staff's recommendation in this memo.

PROJECT NO. 52307

REVIEW OF RULES ADOPTED BY	§	PUBLIC UTILITY COMMISSION
THE INDEPENDENT ORGANIZATION	§	
IN CALENDAR YEAR 2021	§	OF TEXAS

PROPOSED ORDER APPROVING ERCOT REVISION REQUESTS

This Order addresses revisions to three Electric Reliability Council of Texas (ERCOT) Market Guide sections. The Commission approves the revisions and the accompanying market impact statements.

The ERCOT Technical Advisory Committee (TAC) approved Retail Market Revision Request (RMGRR) 167, *Switch Hold Removal Documentation Clarification*, and Nodal Operating Guide Revision Request (NOGRR) 227, *Add Phasor Measurement Recording Equipment Location for Main Power Transformer for Intermittent Renewable Resource (IRR)*, at its meeting on August 27, 2021. In addition, the ERCOT TAC approved NOGRR 223, *Add Phasor Measurement Recording Equipment Requirement to Modified Generating Facilities in Interconnection Process* at its meeting on September 29, 2021.

Effective June 8, 2021, rules adopted by ERCOT under delegated authority from the Commission are subject to Commission oversight and review and do not take effect before receiving Commission approval.¹ Further, also effective June 8, ERCOT's process for adopting new protocols or revisions to existing protocols must require that new or revised protocols may not take effect until the Commission approves a market impact statement describing the new or revised protocols.²

Commission Staff filed a memorandum on October 6, 2021 related to these revisions in which it recommends that the Commission approve the revisions to the Market Guides. Attached to Commission Staff's memorandum were supporting ERCOT documents, which constitute the market impact analysis.

¹ PURA § 39.151(d); *see also, id.* § 39.151(g-1) ERCOT's protocols must be approved by the commission.

² PURA § 39.151(g-6).

The Commission finds that these revisions are necessary for the proper functioning of the ERCOT market as demonstrated by the supporting material and the Commission issues the following orders:

1. The Commission approves RMGRR 167 and accompanying market impact statement.
2. The Commission approves NOGRR 227 and accompanying market impact statement.
3. The Commission approves NOGRR 223 and accompanying market impact statement.

Signed at Austin, Texas the _____ day of October 2021.

PUBLIC UTILITY COMMISSION OF TEXAS

PETER M. LAKE, CHAIRMAN

WILL MCADAMS, COMMISSIONER

LORI COBOS, COMMISSIONER

JIMMY GLOTFELTY, COMMISSIONER

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RMGRR Number	<u>167</u>	RMGRR Title	Switch Hold Removal Documentation Clarification
Date of Decision	August 27, 2021		
Action	Recommended Approval		
Timeline	Normal		
Proposed Effective Date	Upon Public Utility Commission of Texas (PUCT) approval		
Priority and Rank Assigned	Not applicable		
Retail Market Guide Sections Requiring Revision	7.16.4.3.2, Steps for Removal of a Switch Hold for Meter Tampering for Purposes of a Move in 7.17.3.3.2, Steps for Removal of a Switch Hold for Deferred Payment Plans for Purposes of a Move in 9, Appendix J2, New Occupant Statement 9, Appendix J3, Declaración De Nuevo Ocupante (New Occupant Statement – Spanish)		
Related Documents Requiring Revision/Related Revision Requests	None		
Revision Description	This Retail Market Guide Revision Request (RMGRR) clarifies current documentation that is required for a successful submission to request the removal of a switch hold due to a deferred payment plan or tampering.		
Reason for Revision	<input checked="" type="checkbox"/> Addresses current operational issues. <input type="checkbox"/> Meets Strategic goals (tied to the <u>ERCOT Strategic Plan</u> or directed by the ERCOT Board). <input checked="" type="checkbox"/> Market efficiencies or enhancements <input type="checkbox"/> Administrative <input type="checkbox"/> Regulatory requirements <input type="checkbox"/> Other: (explain) (please select all that apply)		

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Business Case	<p>By indicating that each of the fields on the New Occupant Statement must be completed and providing clarity on acceptable documentation to establish a new retail applicant for electric service, the number of MarkeTraks unexecuted for invalid documentation should be reduced.</p> <p>There has been a 93% increase from the first half of 2020 to the second half of 2020 in the number of “Switch Hold Removal” MarkeTraks largely due to the Electricity Relief Program and the establishment of a large number of deferred payment plans. This RMGRR ensures that MarkeTraks are processed in a timely manner to enhance the Customer experience.</p>
RMS Decision	<p>On 7/13/21, RMS voted unanimously via roll call to recommend approval of RMGRR167 as revised by RMS. All Market Segments participated in the vote.</p> <p>On 8/3/21, RMS voted unanimously via roll call to endorse and forward to TAC the 7/13/21 RMS Report, with a recommended effective date of upon PUCT approval; and the Impact Analysis for RMGRR167. All Market Segments participated in the vote.</p>
Summary of RMS Discussion	<p>On 7/13/21, participants applied clarification language to RMGRR167 and reversed the striking of paragraphs (1)(a)(ii)(F) in Sections 7.16.4.3.2 and 7.17.3.3.2, respectively.</p> <p>On 8/3/21, participants discussed RMGRR167’s revised approval process, concluding with PUCT approval.</p>
TAC Decision	<p>On 8/27/21, TAC voted unanimously via roll call to recommend approval of RMGRR167 as recommended by RMS in the 8/3/21 RMS Report. All Market Segments participated in the vote.</p>
Summary of TAC Discussion	<p>On 8/27/21, TAC reviewed the ERCOT Opinion and ERCOT Market Impact Statement for RMGRR167.</p>
ERCOT Opinion	<p>ERCOT supports approval of RMGRR167.</p>
ERCOT Market Impact Statement	<p>ERCOT Staff has reviewed RMGRR167 and believes that RMGRR167 meets the market request to clarify current documentation that is required in order to successfully request to remove a switch hold in the case of a deferred payment plan or tampering.</p>

Sponsor	
Name	Sheri Wiegand on behalf of Texas Data Transport and MarkeTrak Systems (TDTMS) Working Group

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E-mail Address	<u>Sheri.wiegand@vistracorp.com</u>
Company	Vistra Corp
Phone Number	972-979-5225
Cell Number	972-979-5225
Market Segment	Not Applicable

Market Rules Staff Contact	
Name	Jordan Troublefield
E-Mail Address	<u>Jordan.Troublefield@ercot.com</u>
Phone Number	512-248-6521

Comments Received	
Comment Author	Comment Summary
None	

Market Rules Notes

None

Proposed Guide Language Revision

7.16.4.3.2 *Steps for Removal of a Switch Hold for Meter Tampering for Purposes of a Move in*

- (1) Switch Hold Removal Step 1 – Gaining CR
 - (a) Once the gaining CR determines that the Customer requesting the move in is neither the Customer nor associated with the Customer subject to the switch hold, the gaining CR shall obtain the documentation listed in items (i) and (ii) below from the Customer to remove the switch hold. For move ins associated with a Continuous Service Agreement (CSA), only documentation in item (iii) below is required.
 - (i) A signed statement as set forth in Section 9, Appendices, Appendix J2, New Occupant Statement, or Appendix J3, Declaración De Nuevo Ocupante (New Occupant Statement – Spanish), from the applicant stating that the applicant is a new occupant of the Premise(s) and is not associated with the preceding occupant. All fields must be completed to be considered a valid submission; and

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- (ii) The name(s) on the New Occupant Statement shall appear at least one time on any of the following document(s), and may be rejected if the name(s) cannot be reconciled:
 - (A) One of the following bills, in the new occupant's name, dated within the last two months from a different Premise address (cell phone invoices are not accepted):
 - (1) Natural Gas/Propane;
 - (2) Water/Sewer;
 - (3) Electricity; or
 - (4) Cable/Internet.
 - (B) Copy of a current lease signed by all parties subsequent to the date the switch hold was applied to the Premise for the new occupant requesting move in (any expired lease agreements, or any lease agreement not signed by all parties shall be rejected);
 - (C) Notarized affidavit of landlord (see Section 9, Appendices, Appendix J6, Sample – Affidavit of Landlord);
 - (D) Closing documents indicating transfer of ownership occurred subsequent to the date the switch hold applied to Premise:
 - (1) Closing Statement with buyer/seller signatures; or
 - (2) Deed that has been filed with the county clerk, indicating street name and house number;
 - (E) Certificate of occupancy indicating new occupant being subsequent to the date of the switch hold applied to the Premise;
 - (F) Other comparable documentation in the name of the new retail applicant for electric service.
 - (iii) A Continuous Service Agreement Statement as set forth in Section 9, Appendices, Appendix J4, Continuous Service Agreement (English), or Appendix J5, Declaración de Acuerdo de Servicio Continuo (Continuous Service Agreement Statement – Spanish), from the current CSA REP of record stating that the Premise is vacant and has an active CSA.
- (b) Gaining CR shall create a MarkeTrak issue using the subtype of *Switch Hold Removal*, attach all required documentation and assign the issue to the TDSP.

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(2) Switch Hold Removal Step 2 – TDSP

- (a) The TDSP shall reply within one Business Hour of becoming the responsible Market Participant of the MarkeTrak issue with one of the responses below:
 - (i) The TDSP may reject the issue. If the issue is rejected, any further request to have the switch hold removed must be submitted in the form of a new MarkeTrak issue. All timelines will be reset upon submittal of a new MarkeTrak issue as outlined starting with Switch Hold Removal Step 1 in paragraph (1) above. Reasons for which the TDSP may reject the issue are as follows:
 - (A) Inadequate documentation upon submission of the MarkeTrak issue;
 - (1) Name(s) on New Occupant Statement does not appear on any documentation submitted under paragraph (1)(a)(ii) above;
 - (B) Reasonable determination that the gaining CR's Customer is associated with the Customer who resided at the location when meter tampering occurred, including the reason for this determination and all relevant internal documentation;
 - (C) Current REP of record is the submitter of the MarkeTrak issue; or
 - (D) No switch hold is currently applied to the ESI ID.
 - (ii) The TDSP may accept the issue and shall:
 - (A) Transition the MarkeTrak issue to the current REP of record; or
 - (B) Proceed to Switch Hold Removal Step 4 in paragraph (4) below if there is no REP of record; and
 - (C) Assign the issue back to the gaining CR.

(3) Switch Hold Removal Step 3 – Losing CR

- (a) The losing CR shall take the following action within one and a half Business Hours of having been assigned the issue by the TDSP:
 - (i) Review all documentation provided by the gaining CR; and
 - (ii) Transition the issue as indicated below:
 - (A) If the losing CR agrees that gaining CR's Customer is not associated with the losing CR's Customer, the losing CR shall select the "Agree" transition within MarkeTrak; or

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- (B) If the losing CR has information that indicates that the gaining CR's Customer and the losing CR's Customer are associated, the losing CR shall choose the "Disagree" transition within MarkeTrak. Additionally, the losing CR must state reasons for disagreement and attach documents that support the losing CR's position.
- (b) If the losing CR has not chosen the "Agree" or "Disagree" transition within one and a half Business Hours of receipt, therefore remaining Responsible Market Participant within the MarkeTrak issue, the losing CR is considered to agree with the gaining CR's removal of the switch hold request.
 - (i) The gaining CR may use the "Time Limit Exceeded" transition to request a final decision from the TDSP if there is no response from the losing CR by the end of the allotted time. The gaining CR shall only use this transition when the losing CR has been Responsible Market Participant of the MarkeTrak issue in excess of their allotted time. The TDSP will become Responsible Market Participant if this transition is used by the gaining CR.
- (4) Switch Hold Removal Step 4 – TDSP
 - (a) The TDSP shall have the remaining time between the assignment of the issue and the end of the four Business Hours timeframe to respond with a decision, but no less than one and a half Business Hours.
 - (b) The TDSP shall review all comments and documentation received, but retains the discretion to determine the final status of the switch hold. Upon completion of the review, the TDSP shall take the following action:
 - (i) Disapprove the removal of the switch hold during the final review period if the TDSP has internal information that indicates the requesting CR's Customer is associated with the losing CR's Customer regardless of documentation provided. TDSP shall place comments in the issue notifying parties of the reason for disapproval and attach all relevant internal documentation;
 - (ii) Approve the removal of the switch hold upon verification that the losing CR failed to respond within one and a half Business Hours of receipt using the "State Change History" as the sole indicator if the gaining CR transitions the MarkeTrak issue to the TDSP requesting a final decision due to the losing CR's failure to respond to the issue within the allotted timeframe. The TDSP shall remove the switch hold to allow completion of a move in request and place comments in the issue notifying parties of the decision to remove the switch hold;
 - (iii) Review the MarkeTrak issue received with comments from both CRs and if it is determined that the TDSP has no internal information that indicates

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the gaining CR's Customer is associated with the losing CR's Customer, the TDSP shall:

- (A) If there is agreement among both CRs that the switch hold should be removed, the TDSP will remove the switch hold and assign the issue back to the gaining CR, notifying parties of the removal of the switch hold, through comments; or
 - (B) If there is disagreement, the TDSP will evaluate all information provided by both CRs and assign the issue back to the gaining CR with the final decision to approve or deny the request to remove the switch hold, through comments. If the decision is to approve the request to remove the switch hold, the TDSP shall remove the switch hold prior to assigning the issue back to the gaining CR.
- (iv) Disapprove the removal of the switch hold and notify parties, through comments, of the reason for disapproval if the TDSP receives the MarkeTrak issue from the gaining CR for a final decision and the "State Change History" indicates that the losing CR was not provided the full one and a half Business Hours allocated under Switch Hold Removal Step 3 in paragraph (3) above; or
 - (v) Disapprove the removal of the switch hold and notify parties, through comments, of the reason for disapproval if the TDSP does not receive the full Business Hour for review and the allotted time was inadequate for a final decision to be made.
- (5) Switch Hold Removal Step 5 – All Market Participants Involved
- (a) If at any time, the TDSP becomes aware that the MarkeTrak issue was not resolved within the four Business Hour timeframe, the TDSP shall make a decision on whether or not to remove the switch hold based upon the existing activity within the MarkeTrak issue. The TDSP shall place comments in the MarkeTrak issue containing the final decision and transition the issue if possible.
 - (b) If at any time, the gaining CR becomes aware that the MarkeTrak issue was not resolved within the four Business Hour timeframe, the gaining CR shall notify the TDSP, via the MarkeTrak e-mail function and request a final decision.
 - (c) If at any time, the losing CR becomes aware that the MarkeTrak issue was not resolved within the four Business Hour timeframe, the losing CR shall notify the TDSP, via the MarkeTrak e-mail function and request a final decision.

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7.17.3.3.2 *Steps for Removal of a Switch Hold for Deferred Payment Plans for Purposes of a Move in*

- (1) Switch Hold Removal Step 1 – Gaining CR
 - (a) Once the gaining CR determines that the Customer requesting the move in is neither the Customer nor associated with the Customer subject to the switch hold, the gaining CR shall obtain the documentation listed in items (i) and (ii) below from the Customer to remove the switch hold. For move ins associated with a Continuous Service Agreement (CSA), only documentation in item (iii) below is required.
 - (i) A signed statement as set forth in Section 9, Appendices, Appendix J2, New Occupant Statement, or Appendix J3, Declaración De Nuevo Ocupante (New Occupant Statement – Spanish), from the applicant stating that the applicant is a new occupant of the Premise(s) and is not associated with the preceding occupant. All fields must be completed to be considered a valid submission; and
 - (ii) The name(s) on the New Occupant Statement shall appear at least one time on any of the following document(s) and may be rejected if the name(s) cannot be reconciled:
 - (A) One of the following bills, in the new occupant's name, dated within the last two months from a different Premise address (cell phone invoices are not accepted):
 - (1) Natural Gas/Propane;
 - (2) Water/Sewer;
 - (3) Electricity; or
 - (4) Cable/Internet.
 - (B) Copy of a current, lease signed by all parties subsequent to the date the switch hold was applied to the Premise for the new occupant requesting the move in (any expired lease agreements, or any lease agreement not signed by all parties shall be rejected);
 - (C) Notarized affidavit of landlord (see Section 9, Appendices, Appendix J6, Sample – Affidavit of Landlord);
 - (D) Closing documents indicating transfer of ownership occurred subsequent to the date the switch hold applied to Premise:
 - (1) Closing Statement with buyer/seller signatures; or

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- (2) Deed that has been filed with the county clerk, indicating street name and house number;
 - (E) Certificate of occupancy indicating new occupant being subsequent to the date of the switch hold applied to the Premise;
 - (F) Other comparable documentation in the name of the new retail applicant for electric service.
 - (iii) A Continuous Service Agreement Statement as set forth in Section 9, Appendices, Appendix J4, Continuous Service Agreement (English), or Appendix J5, Declaración de Acuerdo de Servicio Continuo (Continuous Service Agreement Statement – Spanish), from the current CSA REP of record stating that the Premise is vacant and has an active CSA.
 - (b) Gaining CR shall create a MarkeTrak issue using the subtype of *Switch Hold Removal*, attach all required documentation and assign the issue to the TDSP.
- (2) Switch Hold Removal Step 2 – TDSP
 - (a) The TDSP shall reply within one Business Hour of becoming the responsible Market Participant of the MarkeTrak issue with one of the responses below:
 - (i) The TDSP may reject the issue. If the issue is rejected, any further request to have the switch hold removed must be submitted in the form of a new MarkeTrak issue. All timelines will be reset upon submittal of a new MarkeTrak issue as outlined starting with Switch Hold Removal Step 1 in paragraph (1) above. Reasons for which the TDSP may reject the issue are as follows:
 - (A) Inadequate documentation upon submission of the MarkeTrak issue;
 - (1) Name(s) on New Occupant Statement does not appear on any documentation submitted under paragraph (1)(a)(ii) above;
 - (B) Reasonable determination that the gaining CR's Customer is associated with the Customer who resided at the location when placement of the switch hold occurred, including the reason for this determination and all relevant internal documentation;
 - (C) Current REP of record is the submitter of the MarkeTrak issue; or
 - (D) No switch hold is currently applied to the ESI ID.

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- (ii) The TDSP may accept the issue and shall:
 - (A) Transition the MarkeTrak issue to the current REP of record; or
 - (B) Proceed to Switch Hold Removal Step 4 in paragraph (4) below if there is no REP of record; and
 - (C) Assign the issue back to the gaining CR.
- (3) Switch Hold Removal Step 3 – Losing CR
 - (a) The losing CR shall take the following action within one and a half Business Hours of having been assigned the issue by the TDSP:
 - (i) Review all documentation provided by the gaining CR; and
 - (ii) Transition the issue as indicated below:
 - (A) If the losing CR agrees that gaining CR's Customer is not associated with the losing CR's Customer, the losing CR shall select the "Agree" transition within MarkeTrak; or
 - (B) If the losing CR has information that indicates that the gaining CR's Customer and the losing CR's Customer are associated, the losing CR shall choose the "Disagree" transition within MarkeTrak. Additionally, the losing CR must state reasons for disagreement and attach documents that support the losing CR's position.
 - (b) If the losing CR has not chosen the "Agree" or "Disagree" transition within one and a half Business Hours of receipt, therefore remaining Responsible Market Participant within the MarkeTrak issue, the losing CR is considered to agree with the gaining CR's removal of the switch hold request.
 - (i) The gaining CR may use the "Time Limit Exceeded" transition to request a final decision from the TDSP if there was no response from the losing CR by the end of their allotted time. The gaining CR shall only use this transition when the losing CR has been Responsible Market Participant of the MarkeTrak issue in excess of their allotted time. The TDSP will become Responsible Market Participant if this transition is used by the gaining CR.
- (4) Switch Hold Removal Step 4 – TDSP
 - (a) The TDSP shall have the remaining time between the assignment of the issue and the end of the four Business Hours timeframe to respond with a decision, but no less than one and a half Business Hours.

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- (b) The TDSP shall review all comments and documentation received, but retains the discretion to determine the final status of the switch hold. Upon completion of the review, the TDSP shall take the following action:
 - (i) Disapprove the removal of the switch hold during the final review period if the TDSP has internal information that indicates the requesting CR's Customer is associated with the losing CR's Customer regardless of documentation provided. TDSP shall place comments in the issue notifying parties of the reason for disapproval and attach all relevant internal documentation;
 - (ii) Approve the removal of the switch hold upon verification that the losing CR failed to respond within one and a half Business Hours of receipt using the "State Change History" as the sole indicator if the gaining CR transitions the MarkeTrak issue to the TDSP requesting a final decision due to the losing CR's failure to respond to the issue within the allotted time frame. The TDSP shall remove the switch hold to allow completion of a move in request and place comments in the issue notifying parties of the decision to remove the switch hold;
 - (iii) Review the MarkeTrak issue received with comments from both CRs and if it is determined that the TDSP has no internal information that indicates the gaining CR's Customer is associated with the losing CR's Customer, the TDSP shall:
 - (A) If there is agreement among both CRs that the switch hold should be removed, the TDSP will remove the switch hold and assign the issue back to the gaining CR, notifying parties of the removal of the switch hold, through comments; or
 - (B) If there is disagreement, the TDSP will evaluate all information provided by both CRs and assign the issue back to the gaining CR with the final decision to approve or deny the request to remove the switch hold through comments. If the decision is to approve the request to remove the switch hold, the TDSP shall remove the switch hold prior to assigning the issue back to the gaining CR.
 - (iv) Disapprove the removal of the switch hold and notify parties, through comments, of the reason for disapproval if the TDSP receives the MarkeTrak issue from the gaining CR for a final decision and the "State Change History" indicates that the losing CR was not provided the full one and a half Business Hours allocated under Switch Hold Removal Step 3 in paragraph (3) above; or
 - (v) Disapprove the removal of the switch hold and notify parties, through comments, of the reason for disapproval if the TDSP does not receive the

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full Business Hour for review and the allotted time was inadequate for a final decision to be made.

- (5) Switch Hold Removal Step 5 – All Market Participants Involved
- (a) If at any time, the TDSP becomes aware that the MarkeTrak issue was not resolved within the four Business Hour time frame, the TDSP shall make a decision on whether or not to remove the switch hold based upon the existing activity within the MarkeTrak issue. The TDSP shall place comments in the MarkeTrak issue containing the final decision and transition the issue if possible.
 - (b) If at any time, the gaining CR becomes aware that the MarkeTrak issue was not resolved within the four Business Hour time frame, the gaining CR shall notify the TDSP, via the MarkeTrak e-mail function and request a final decision.
 - (c) If at any time, the losing CR becomes aware that the MarkeTrak issue was not resolved within the four Business Hour time frame, the losing CR shall notify the TDSP, via the MarkeTrak e-mail function and request a final decision.

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ERCOT Retail Market Guide

Section 9: Appendices

Appendix J2: New Occupant Statement

TBD

Appendix J2

New Occupant Statement

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Note: New Occupant Statement must be accompanied by at least one of the following documents:

- Bill for natural gas/propane, water/sewer, electric, or cable/internet in Customer's name dated within last two months from a different Premise (cell phone invoices are not accepted);
- Copy of current signed lease by all parties;
- Notarized affidavit of landlord;
- Closing documents (Closing Statement signed by buyer and seller; Deed filed by county clerk noting street name and house number); or
- Certificate of occupancy indicating new occupant.

All fields must be completed for valid submission.

Electric Service Identifier (ESI ID) Number*

* To be completed by submitting Retail Electric Provider (REP)

Service Address _____

City, State, Zip Code _____

Occupancy Date _____

New Occupant Name _____

Mailing Address _____

City, State, Zip Code _____

Telephone Number _____

AUTHORIZATION

I affirm that I am a new occupant to the above Service Address and I am not associated with the preceding occupant.

(Signature)

(Date)

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(Name)

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ERCOT Retail Market Guide

Section 9: Appendices

Appendix J3: Declaración De Nuevo Ocupante (New Occupant Statement – Spanish)

TBD

Appendix J3

Declaración De Nuevo Ocupante (New Occupant Statement – Spanish)

ESI ID = Identificador de Servicio Eléctrico

Nota: Declaración de un nuevo ocupante debe ir acompañada de al menos uno de los siguientes documentos:

- La factura de utilidades (electricidad, gas natural/propano, agua/alcantarillado, o cable/internet) a nombre del Cliente, con fecha dentro de los últimos dos meses de una dirección diferente (no se aceptan facturas de celular telefónica);
- Copia del contrato de arrendamiento firmado por ambas partes;

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- Declaración jurada de propietario;
- Los documentos de cierre (Declaración de cierre firmado por el comprador y el vendedor, Escritura de Garantía presentado por el secretario del condado mostrando el nombre de la calle y el numero de casa); o
- Certificado de ocupación indicando nuevo ocupante.

Toda la información debe completarse para una presentación válida.

ESI ID (Completado por la compañía eléctrica minorista) _____

Dirección del Servicio _____

Ciudad, Estado, Código Postal _____

Fecha de Ocupación _____

Nombre del Nuevo Ocupante _____

Dirección Postal _____

Ciudad, Estado, Código Postal _____

Número Telefónico _____

AUTORIZACIÓN

Yo afirmo que soy un nuevo ocupante de la dirección de servicio de arriba y no estoy asociado con el ocupante anterior.

(Firma)

(Fecha)

(Nombre)

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ERCOT Impact Analysis Report

RMGRR Number	<u>167</u>	RMGRR Title	Switch Hold Removal Documentation Clarification
Impact Analysis Date	July 27, 2021		
Estimated Cost/Budgetary Impact	None.		
Estimated Time Requirements	No project required. This Retail Market Guide Revision Request (RMGRR) can take effect upon Public Utility Commission of Texas (PUCT) approval.		
ERCOT Staffing Impacts (across all areas)	Ongoing Requirements: No impacts to ERCOT staffing.		
ERCOT Computer System Impacts	No impacts to ERCOT computer systems.		
ERCOT Business Function Impacts	No impacts to ERCOT business functions.		
Grid Operations & Practices Impacts	No impacts to ERCOT grid operations and practices.		

Evaluation of Interim Solutions or Alternatives for a More Efficient Implementation

None offered.

Comments

None.

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NOGRR Number	<u>227</u>	NOGRR Title	Add Phasor Measurement Recording Equipment Location for Main Power Transformer for Intermittent Renewable Resource (IRR)
Date of Decision	August 27, 2021		
Action	Recommended Approval		
Timeline	Normal		
Proposed Effective Date	November 1, 2021		
Priority and Rank Assigned	Not Applicable		
Nodal Operating Guide Sections Requiring Revision	6.1.3.3, Data Recording and Redundancy Requirements		
Related Documents Requiring Revision/Related Revision Requests	None		
Revision Description	This Nodal Operating Guide Revision Request (NOGRR) allows for single phase current magnitude/angle data for an interconnected Intermittent Renewable Resource (IRR) over 20 MVA to be taken from either side of the main power transformer where turbines exist on a feeder(s) that were aggregated to two or more IRRs.		
Reason for Revision	<input checked="" type="checkbox"/> Addresses current operational issues. <input type="checkbox"/> Meets Strategic goals (tied to the <u>ERCOT Strategic Plan</u> or directed by the ERCOT Board). <input type="checkbox"/> Market efficiencies or enhancements <input type="checkbox"/> Administrative <input type="checkbox"/> Regulatory requirements <input type="checkbox"/> Other: (explain) <i>(please select all that apply)</i>		
Business Case	Many IRRs aggregate turbines/inverters that exist on the same feeder or feeders to two or more Resources. In this case, it is physically impossible to measure the single phase current		

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	magnitude/angle per individual Resource. This NOGRR allows the current magnitude/angle to be measured at a point where the flow from the IRR flows through the same element, such as the main power transformer.
ROS Decision	<p>On 6/3/21, ROS voted unanimously via roll call to table NOGRR227 and refer the issue to the Operations Working Group (OWG). All Market Segments participated in the vote.</p> <p>On 7/8/21, ROS voted unanimously via roll call to recommend approval of NOGRR227 as submitted. All Market Segments participated in the vote.</p> <p>On 8/5/21, ROS voted unanimously via roll call to endorse and forward to TAC the 7/8/21 ROS Report and the Revised Impact Analysis for NOGRR227. All Market Segments participated in the vote.</p>
Summary of ROS Discussion	<p>On 6/3/21, there was no discussion.</p> <p>On 7/8/21, there was no discussion.</p> <p>On 8/5/21, participants noted the Revised Impact Analysis.</p>
TAC Decision	On 8/27/21, TAC voted unanimously via roll call to recommend approval of NOGRR227 as recommended by ROS in the 8/5/21 ROS Report. All Market Segments participated in the vote.
Summary of TAC Discussion	On 8/27/21, TAC reviewed the ERCOT Opinion and ERCOT Market Impact Statement for NOGRR227.
ERCOT Opinion	ERCOT supports approval of NOGRR227.
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR227 and believes that NOGRR227 will improve efficiencies for Entities by allowing current magnitude/angle to be taken from either side of the main power transformer where turbines exist on feeders that were aggregated.

Sponsor	
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Market Segment	Not Applicable

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Market Rules Staff Contact	
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Comments Received	
Comment Author	Comment Summary
None	

Market Rules Notes

None

Proposed Guide Language Revision

6.1.3.3 Data Recording and Redundancy Requirements

- (1) Recorded electrical quantities shall be sufficient to determine the following:
 - (a) For Transmission Facility owner locations meeting paragraphs (1) or (2) of Section 6.1.3.2, Location Requirements:
 - (i) Phase-to-neutral voltage magnitude/angle data for each phase from at least two distinct transmission level element measurements;
 - (ii) Single phase current magnitude/angle data for each phase from at least two distinct transmission level lines; and
 - (iii) Frequency and df/dt data for at least two transmission level element measurements.
 - (b) For Generator Resource owner locations meeting Section 6.1.3.2:
 - (i) Phase-to-neutral voltage, or phase-to-phase voltage magnitude/angle data for each phase from at least one generator-interconnected bus measurement;
 - (ii) Single phase current magnitude/angle data for each phase from each interconnected generator over 20 MVA or on the high or low side of a main power transformer that represents the flow from multiple Intermittent Renewable Resources (IRRs) behind the main power transformer with total aggregated capacity greater than 20 MVA; and

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[NOGRR227: Replace item (ii) above with the following upon system implementation of NPRR973:]

- (ii) Single phase current magnitude/angle data for each phase from each interconnected generator over 20 MVA or on the high or low side of a Main Power Transformer (MPT) that represents the flow from multiple Intermittent Renewable Resources (IRRs) behind the MPT with total aggregated capacity greater than 20 MVA; and
- (iii) Frequency and df/dt data for at least one generator-interconnected bus measurement.

Revised ERCOT Impact Analysis Report

NOGRR Number	<u>227</u>	NOGRR Title	Add Phasor Measurement Recording Equipment Location for Main Power Transformer for Intermittent Renewable Resource (IRR)
Impact Analysis Date	July 27, 2021		
Estimated Cost/Budgetary Impact	None.		
Estimated Time Requirements	No project required. This Nodal Operating Guide Revision Request (NOGRR) can take effect upon Public Utility Commission of Texas (PUCT) approval.		
ERCOT Staffing Impacts (across all areas)	Ongoing Requirements: No impacts to ERCOT staffing.		
ERCOT Computer System Impacts	No impacts to ERCOT computer systems.		
ERCOT Business Function Impacts	No impacts to ERCOT business functions.		
Grid Operations & Practices Impacts	ERCOT will update grid operations and practices to implement this NOGRR.		

Evaluation of Interim Solutions or Alternatives for a More Efficient Implementation

None offered.

Comments

None.

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NOGRR Number	<u>223</u>	NOGRR Title	Add Phasor Measurement Recording Equipment Requirement to Modified Generating Facilities in Interconnection Process
Date of Decision	September 29, 2021		
Action	Recommended Approval		
Timeline	Normal		
Proposed Effective Date	November 1, 2021		
Priority and Rank Assigned	Not applicable		
Nodal Operating Guide Sections Requiring Revision	6.1.3.2, Location Requirements		
Related Documents Requiring Revision/Related Revision Requests	None		
Revision Description	This Nodal Operating Guide Revision Request (NOGRR) adds the requirement to have phasor measurement recording equipment at existing facilities that have an aggregated generating capacity above 20 MVA at a single site following any modification that is described in paragraph (1)(b) of Planning Guide Section 5.1.1, Applicability, in order to enter the Generation Resource Interconnection or Change Request (GINR) process.		
Reason for Revision	<input checked="" type="checkbox"/> Addresses current operational issues. <input type="checkbox"/> Meets Strategic goals (tied to the <u>ERCOT Strategic Plan</u> or directed by the ERCOT Board). <input type="checkbox"/> Market efficiencies or enhancements <input type="checkbox"/> Administrative <input type="checkbox"/> Regulatory requirements <input type="checkbox"/> Other: (explain) <i>(please select all that apply)</i>		

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Business Case	Phasor measurement recording equipment is necessary to ensure the reliability of the ERCOT System by providing accurate disturbance data for off-line studies and model verification.
ROS Decision	<p>On 3/4/21, ROS unanimously voted via roll call to table NOGRR223 and refer the issue to the Operations Working Group (OWG). All Market Segments participated in the vote.</p> <p>On 8/5/21, ROS voted via roll call to recommend approval of NOGRR223 as amended by the 6/10/21 ERCOT comments. There were 13 abstentions from the Consumer (2) (OPUC, Air Liquide), Independent Generator (2) (Exelon, Calpine), Independent Power Marketer (IPM) (3) (Shell, Morgan Stanley, Tenaska), Independent Retail Electric Provider (IREP) (2) (Reliant, Demand Control 2), and Municipal (4) (Brownsville, CPS, Austin Energy, Garland) Market Segments. All Market Segments participated in the vote.</p> <p>On 9/2/21, ROS voted unanimously via roll call to endorse and forward to TAC the 8/5/21 ROS Report and the Revised Impact Analysis for NOGRR223. All Market Segments participated in the vote.</p>
Summary of ROS Discussion	<p>On 3/4/21, ERCOT Staff provided an overview of NOGRR223.</p> <p>On 8/5/21, the OWG Chair reported to ROS that the group had been unable to reach a consensus in regard to NOGRR223's modified generator requirements; opponents noted that NOGRR223 exceeds current North American Electric Reliability Corporation (NERC) requirements; ERCOT staff provided additional details regarding the reliability benefits of phasor measurement units.</p> <p>On 9/2/21, participants noted the Revised Impact Analysis.</p>
TAC Decision	On 9/29/21, TAC voted via roll call to recommend approval of NOGRR223 as recommended by ROS in the 9/2/21 ROS Report as revised by TAC. There was one opposing vote from the Independent Generator (Luminant) Market Segment and two abstentions from the IPM (2) (Shell, Morgan Stanley) Market Segment. All Market Segments participated in the vote.
Summary of TAC Discussion	On 9/29/21, edits were proposed to correct references to the general terms 'facility' and 'facilities' in paragraph (4) of Section 6.1.3.2. The 5/26/21 Luminant comments were referenced by the opposing party who explained that the requirements proposed in NOGRR223 were too broadly applied and burdensome to existing generator facilities. TAC reviewed the ERCOT Opinion and ERCOT Market Impact

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	Statement for NOGRR223.
ERCOT Opinion	ERCOT supports approval of NOGRR223.
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR223 and believes the market impact for NOGRR223 addresses current operational issues by requiring existing facilities that have an aggregated generating capacity above 20 MVA at a single site to install phasor measurement recording equipment at facilities following any of these stated modifications that require entry into the generation interconnection process: the upgrading of the summer or winter Seasonal Net Max Sustainable Rating from what is shown in the latest Resource Registration data by ten MW or greater within a single year; the changing of the inverter, turbine, generator, or power converter that is associated with a facility of ten MW or greater, unless the replacement is in-kind; or the changing or adding of a Point of Interconnection (POI) to a facility of ten MW or greater.

Sponsor	
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Market Segment	Not Applicable

Market Rules Staff Contact	
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Comments Received	
Comment Author	Comment Summary
Luminant 052621	Suggested that NOGRR223 does not justify why ERCOT requires phasor measurement unit capability and stated that NOGRR223's recording equipment requirements exceed NERC Standard PRC-002, Disturbance Monitoring and Reporting Requirements

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ERCOT 061021	Stated the benefits of phasor measurement units and their impact on reliability; and applied a language change to paragraph (4) of Section 6.1.3.2 in alignment with NOGRR223's original edits
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Market Rules Notes

None

Proposed Guide Language Revision

6.1.3.2 Location Requirements

- (1) ERCOT shall identify Transmission Elements operated at or above 100 kV for which dynamic disturbance recording data is required, including the following:
 - (a) Generation Resource(s) with:
 - (i) Gross individual nameplate rating greater than or equal to 500 MVA; or
 - (ii) Gross individual nameplate rating greater than or equal to 300 MVA where the gross plant/facility aggregate nameplate rating is greater than or equal to 1,000 MVA;
 - (b) Any one Transmission Element that is part of a stability (angular or voltage) related system operating limit;
 - (c) Each terminal of a high-voltage, direct current (HVDC) circuit with a nameplate rating greater than or equal to 300 MVA, on the alternating current portion of the converter;
 - (d) One or more Transmission Elements that are part of an Interconnection Reliability Operating Limit (IROL); and
 - (e) Any one Transmission Element within a major voltage sensitive area as defined by an area with an in-service Under-Voltage Load Shedding (UVLS) program.
- (2) ERCOT shall identify a minimum dynamic disturbance recording coverage, inclusive of those Transmission Elements identified above, of a least:
 - (a) One Transmission Element; and
 - (b) One Transmission Element per 3,000 MW of ERCOT's historical simultaneous peak Demand.
- (3) Facility owners identified under paragraphs (1) or (2) above shall install dynamic disturbance recording equipment such that half of the identified facilities have the

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associated equipment installed by July 1, 2020, and all of the identified facilities by July 1, 2022.

- (4) The facility owner(s), whether a Transmission Facility owner or Generation Resource owner, shall install phasor measurement recording equipment at the following facilities :
- (a) Flexible AC transmission system devices configured to actively control steady-state voltage or power transfer capability, operated at or above 100 kV, and energized after July 1, 2015;
 - (b) Within 18 months after receiving written notice from ERCOT, a Transmission Facility identified by ERCOT associated with each published generic transmission constraint as deemed necessary by ERCOT; and
 - (c) New generating facilities over 20 MVA aggregated at a single site placed into service after January 1, 2017; and
 - (d) Existing generating facilities over 20 MVA aggregated at a single site following any modification described in paragraph (1)(b) of Planning Guide Section 5.1.1, Applicability, with the modification's Initial Synchronization after January 1, 2022.

[NOGRR177: Insert item (e) below upon system implementation of NPRR857:]

- (e) New Direct Current Ties (DC Ties) placed into service after January 1, 2019.

Revised ERCOT Impact Analysis Report

NOGRR Number	<u>223</u>	NOGRR Title	Add Phasor Measurement Recording Equipment Requirement to Modified Generating Facilities in Interconnection Process
Impact Analysis Date	August 4, 2021		
Estimated Cost/Budgetary Impact	None.		
Estimated Time Requirements	No project required. This Nodal Operating Guide Revision Request (NOGRR) can take effect upon Public Utility Commission of Texas (PUCT) approval.		
ERCOT Staffing Impacts (across all areas)	Ongoing Requirements: No impacts to ERCOT staffing.		
ERCOT Computer System Impacts	No impacts to ERCOT computer systems.		
ERCOT Business Function Impacts	No impacts to ERCOT business functions.		
Grid Operations & Practices Impacts	ERCOT will update grid operations and practices to implement this NOGRR.		

Evaluation of Interim Solutions or Alternatives for a More Efficient Implementation

None offered.

Comments

None.