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Public Utility Commission of Texas

Memorandum

TO: Chairman Thomas J. Gleeson
Commissioner Kathleen Jackson
Commissioner Courtney K. Hjaltman

FROM: Kim Van Winkle, Market Analysis Division

DATE: January 9, 2025

RE: January 16, 2025, Open Meeting – Item No. 41
Project No. 54445 – *Review of Protocols Adopted by the Independent Organization (Discussion and possible action)*

Before the Commission are eight new Nodal Protocol Revision Requests (NPRRs), two Nodal Operating Guide Revision Requests (NOGRRs), one Other Binding Document Revision Request (OBDRR), and two Planning Guide Revision Requests (PGRRs) passed through the stakeholder process by the Technical Advisory Committee (TAC) and approved by the Electric Reliability Council of Texas (ERCOT) Board of Directors (Board) at its December 3, 2024, meeting. The Board Reports (including ERCOT Market Impact Statements) and ERCOT Impact Analyses for the above revisions were filed in this project on December 9, 2024.¹ These documents are intended to provide an overview describing each revision. Commission Staff recommends approval of each of these revisions.

- NPRR11180, *Inclusion of Forecasted Load in Planning Analyses* – This NPRR revises the Protocols to address recent amendments to P.U.C. SUBST. R. 25.101, Certification Criteria, which became effective on December 20, 2022. Specifically, it incorporates the requirement in section 25.101(b)(3)(A)(ii)(II) for any reliability-driven transmission project review conducted by ERCOT to incorporate the historical load, forecasted load growth, and additional load seeking interconnection, in the ERCOT independent review.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Senate Bill 1281 (87th Texas Legislature); House Bill 5066 (88th Texas Legislature); and PUC Rule 25.101, Certification Criteria
TAC Opposition	Approved with four abstentions from the Consumer (2) (Residential Consumer, OPUC), Cooperative (GSEC) and Independent Power Marketer (IPM) (SENA) Market Segments.

¹ Notice of Recommended Approval of Revision Requests by ERCOT Board of Directors, AIS Item No. 101 (Dec. 9, 2024).

ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1180 and believes it appropriately incorporates the requirement in P.U.C. Subst. R.25.101(b)(3)(A)(ii)(II) for any reliability-driven transmission project review conducted by ERCOT to account for historical Load, forecasted Load growth, and additional Load seeking interconnection.
Sponsor	Oncor
IMM Opinion	The IMM conditionally supports NPRR1180 in concept however the details of the robustness and use of data in developing inputs to the planning analysis are important. IMM support is contingent upon ERCOT's ability to apply reasonable methods to the data they are provided in order to produce the most accurate forecast for use in planning analysis.

- *PGRR107, Related to NPRR1180, Inclusion of Forecasted Load in Planning Analyses* – This PGRR aligns the Planning Guide with NPRR1180. Specifically, this PGRR incorporates the requirement in P.U.C. Subst. R. 25.101(b)(3)(A)(ii)(II) for any review of project need conducted by ERCOT to incorporate the historical load, forecasted load growth, and additional load seeking interconnection, in ERCOT's analysis, while recognizing that ERCOT's Regional Transmission Plan will include only that load that ERCOT has determined to be credibly supported by quantifiable evidence of load growth. PGRR107 also requires a Regional Planning Group (RPG) project submitter to provide such information to ERCOT, when available, for inclusion in ERCOT's planning analyses.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Senate Bill 1281 (87th Texas Legislature); House Bill 5066 (88th Texas Legislature); and PUC Rule 25.101, Certification Criteria
TAC Opposition	Approved with four abstentions from the Consumer (2) (Residential Consumer, OPUC), Cooperative (GSEC) and Independent Power Marketer (IPM) (SENA) Market Segments.
ERCOT Market Impact Statement	ERCOT Staff has reviewed PGRR107 and believes it appropriately aligns the Planning Guide with NPRR1180, which incorporates the requirement in P.U.C. Subst. R.25.101(b)(3)(A)(ii)(II) for any reliability-driven transmission project review conducted by ERCOT to account for historical Load, forecasted Load growth, and additional Load seeking interconnection.
Sponsor	Oncor
IMM Opinion	The IMM conditionally supports PGRR107 in concept however the details of the robustness and use of data in developing inputs to the planning analysis are important. IMM support is contingent upon ERCOT's ability to apply reasonable methods to the data they are provided in order to produce the most accurate forecast for use in planning analysis.

Staff Discussion:

NPRR1180 and related PGRR107 incorporate changes to the transmission planning process set forth by Senate Bill 1281 (87th Texas Legislature) and House Bill 5066 (88th Texas Legislature) and as amended by the PUCT in 16 Texas Administrative Code § 25.101 (specifically, § 25.101(b)(3)(A)(ii)(II)). They require transmission planners to include historical load, forecasted load, and load seeking interconnection that has yet to sign an interconnection agreement in planning analyses. Oncor sponsored the revision requests, but they collaborated with ERCOT to draft the initial language before filing.

The NPRR defines a new term “Substantiated Load” (as well as the inverse term “Unsubstantiated Load”) by outlining three categories of quantifiable evidence for which forecasted load or load seeking interconnection would qualify. The three categories include: an executed interconnection agreement, an independent third-party load forecast deemed credible by ERCOT representing loads for which no interconnection agreement has been signed, and a letter from a transmission distribution service provider (TDSP) attesting to load for which an interconnection agreement has yet to be signed. The PGRR integrates the new definitions into the transmission project submission requirements and the transmission planning model assumptions and evaluation.

Implementing Substantiated Loads into all ERCOT’s transmission planning models will be an ongoing task that will require additional full-time staff. Therefore, the approved Impact Analysis associated with NPRR1180 included accounting for up to 11.8 FTEs at an operational budget impact between \$2.0M and \$2.4M.

These revision requests were discussed at the October and November Technical Advisory Committee (TAC) meetings. At the October 30, 2024 TAC meeting, stakeholders in opposition of the NPRR moving forward in its current form believed that the officer attestation letter category required additional refinement and standardization across the TDSPs to ensure transmission facilities are not overbuilt. ERCOT noted that before transmission is built there already are existing processes which appraise the reasonability of load, including open presentations at the RPG and the PUCT’s certificate of convenience and necessity application process. Supporters of moving NPRR1180 forward agreed that there would be benefit in standardizing the officer attestation letters, but they claimed it should be done as part of a separate revision request effort. Stakeholders unanimously voted to table NPRR1180.

At the November 20, 2024 TAC meeting, stakeholders primarily discussed recent comments filed by Oncor and OPUC. OPUC expressed concern over the costs that consumers will bear for the expanded transmission due to the current Substantiated Load definition. They stated that ERCOT should collaborate with stakeholders to develop a more transparent and well-defined approach to load forecasting. Oncor filed comments responding to stakeholder concerns from the previous TAC meeting by committing to develop a new NPRR which will provide additional detail to the officer attestation letters in early 2025. With Oncor’s public commitment to further refine requirements of the attestation letters, most stakeholders supported the revision requests being voted forward. There were four abstentions during the vote: two from the Consumer market segment (Residential Consumer, OPUC), one from Coops (GSEC), and one from Independent Power Marketers (SENA). The only abstaining party that filed comments regarding their position was OPUC.

Staff supports the approval of NPRR1180 and PGRR107. These two revision requests introduce the terminology and planning analyses needed for transmission planners to have a clearer view of the rapidly evolving ERCOT grid. In addition, the prompt approval of these revision requests will enable ERCOT to incorporate them in its independent review of projects resulting from the 2024 Regional Transmission Plan. While Staff agrees that there would be significant benefits to further standardizing the TDSP officer attestation letter category of Substantiated Load and developing more transparent and robust load forecasting processes, Staff believes the current revision requests sufficiently implement the amended Commission rules.

- NPRR1239, *Access to Market Information* This NPRR moves reports from the Market Information System (MIS) Secure Area to the public ERCOT website if they do not contain ERCOT Critical Energy Infrastructure Information (ECEII). ERCOT Staff analyzed reports in the MIS Secure Area, along with existing Protocols for posting requirements, and identified no ongoing basis for holding these reports in the MIS Secure Area determined to contain only information for a market audience and not ECEII.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1239 and believes it provides a positive market impact by improving access and transparency by moving reports that are not ECEII from the MIS Secure Area to the ERCOT website so the public can directly access reports without registering as a Market Participant and requesting ERCOT to issue a Digital Certificate, or without submitting an ERCOT Information Request.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1240, *Access to Transmission Planning Information* – This NPRR moves reports from the MIS Secure Area to the public ERCOT website if they do not contain ECEII. ERCOT Staff analyzed reports in the MIS Secure Area, along with existing Protocols for posting requirements, and identified no ongoing basis for holding in the MIS Secure Area any reports determined to contain only Transmission planning information for a market audience and not ECEII.

In addition, this NPRR also conforms rules with current posting practices for maintaining on the MIS Secure Area ECEII lists of equipment in the Outage Scheduler; for making available in the Model On Demand (MOD) application the annual planning model data submittal schedule; and for posting on the ERCOT website weekly Demand forecasts, demand analyses for 36 months and beyond, metrics of forecast error, and assessments of chronic congestion.

This NPRR also clarifies that the TAC publicly reviews the Major Transmission Elements (MTE) list that is not ECEII, rather than the High Impact Transmission Elements (HITE) list that is ECEII; that Private Use Network Load distribution factor data would be redacted from postings on the ERCOT website rather than on the MIS; and that ERCOT’s monthly evaluations of chronic congestion are posted on the ERCOT website. Finally, this NPRR strikes the requirement to post on the ERCOT website shift schedules for ERCOT Operations Staff as currently, ERCOT posts shift schedules redacted of individuals’ identifying information, making the postings of little or no public use.

Staff Recommendation	Approve
Board Action	Unanimously approved

Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1240 and believes it provides a positive market impact by improving access and transparency by moving reports that are not ECEII from the MIS Secure Area to the ERCOT website so the public can directly access reports without registering as a Market Participant and requesting ERCOT to issue a Digital Certificate, or without submitting an ERCOT Information Request.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1245, *Additional Clarifying Revisions to Real-Time Co-Optimization* – This NPRR was authored by ERCOT during the development of business requirements and adds certain clarifying revisions to the Protocols to address several gaps and errors in the existing approved Protocols for the RTC+B project. These changes have no system impacts as they reflect the current RTC+B business requirements and interface requirements for Market Participants. These revisions broadly fall into three categories:

1. Aligning the Protocol language with other NPRRs that have been passed since the approval of the relevant RTC+B NPRRs, such as NPRR1093, Load Resource Participation in Non-Spinning Reserve;
2. Addressing errors in the language such as Settlement equation subscripts and references to the Supplemental Ancillary Service Market (SASM); and
3. Adding Protocol language to provide additional clarification based on the software requirements that have been developed for the RTC+B project.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1245 and believes the market impact for NPRR1245 implements several corrections and clarifications to Protocols and RTC grey-boxes, along with relevant updates to RTC grey-boxes necessitated by subsequent NPRR approvals.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1247, *Incorporation of Congestion Cost Savings Test in Economic Evaluation of Transmission Projects* – This NPRR incorporates the consumer energy cost reduction test as the congestion cost savings test in economic project evaluation to address recent amendments by the PUCT to 16 Texas Administrative Code § 25.101, specifically adding the requirements in § 25.101(b)(3)(A)(i). Consistent with the PUCT’s rule, this NPRR also preserves the production cost savings test as another standalone means to establish economic need for a transmission project. It also removes obsolete language regarding transmission projects’ benefits evaluation in paragraph (6) of Section 3.11.2.

Additional details regarding how the congestion cost savings test will be performed are included in the Congestion Cost Savings Test Evaluation Guideline white paper, which will be available on the Planning page of the ERCOT website once finalized. ERCOT may also apply the longstanding Impact of Weather Uncertainty and Transmission Outages on Economic Project Evaluations white paper in the instances specified therein to evaluate the impact of weather uncertainties and the impact of including transmission outages on the congestion cost savings test, as it has for the production cost savings test. This white paper is also available on the Planning page of the ERCOT website.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Senate Bill 1281 (87th Legislature); PUC Rule 25.101
TAC Opposition	Approved with three opposing votes from the Independent Generator (2) (Calpine, Luminant) and IPM (Shell) Market Segments; and one abstention from the IREP (Reliant) Market Segment.
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1247 and believes that it provides a positive market impact through regulatory requirements by making the consumer energy cost reduction test the congestion cost savings test in economic project evaluation in response to recent amendments by the PUCT to 16 Texas Administrative Code § 25.101.
Sponsor	ERCOT
IMM Opinion	Supports

Staff Discussion:

This NPRR integrates a new economic project evaluation test to be used in transmission planning called the Congestion Cost Saving Test (CCST). It is designed to measure the amount of consumer energy cost savings which would result from a proposed transmission project. This test originated from Senate Bill 1281 (87th Legislature) and is consistent with the PUCT’s amendments to 16 Texas Administrative Code § 25.101 (specifically, § 25.101(b)(3)(A)(i)).

The CCST is a separate economic test which will be performed alongside the existing Production Cost Savings Test. Each test serves as a standalone evaluation of a transmission project, so passing either test will prove economic need for the project.

ERCOT engaged a third-party consultant, Energy + Environmental Economics, Inc. (E3), to analyze the various economic savings tests used across the world and then recommend the most applicable consumer cost savings test for use in ERCOT’s market. E3 presented its work at the September 2023 Planning Working Group (PLWG) meeting and recommended system-wide energy cost reduction (referred to in E3’s analysis as a “System-Wide Gross Load Cost (GLC) Test”) as the most suitable congestion cost savings test for the ERCOT Region. ERCOT worked with PUCT Staff to review the E3 recommendation, considered stakeholder feedback, and agreed with E3’s recommendation. Due to this being a new test, ERCOT also developed a white paper which outlined the methodology and assumptions used in the CCST so market participants could review it alongside the NPRR.

NPRR1247 was tabled at Reliability and Operations Subcommittee (ROS) and referred to the PLWG where market participants and ERCOT worked together on several issues. In a joint effort to resolve some particularly contentious points, a special session of PLWG was held on October 29, 2024. From this collaboration, ERCOT integrated stakeholder feedback on several topics, some of which were:

- + The economic benefit model projections are consistent with the planning horizon for the Regional Transmission Plan.
- + Upon request, ERCOT will provide inputs, assumptions, and outputs used in the model to stakeholders if that data is neither confidential nor excessively voluminous.
- + In lieu of referencing white papers in the protocols, the NPRR preamble was revised to refer to the existence and location of the white papers which offer more detail on the economic test.

ROS voted to endorse the NPRR on November 7, 2024, and it was granted urgent status from the members of the Protocol Revision Subcommittee on November 14, 2024. On November 20, 2024, NPRR1247 was discussed at TAC. While all market participants agreed that this NPRR originated from legislation which needed action, some raised concerns that the NPRR had been generally rushed through the stakeholder process and it would benefit from tabling so that certain revisions and additions could be further discussed. As such, there was one abstention and three opposing votes.

Explanation of Opposing TAC Votes

The three opposing votes came from the independent generator and the independent power marketer segments.

- + Luminant (Independent Generator) filed two sets of comments. During the TAC discussion, they stated that the economic test chosen by ERCOT does not properly account for both inflation rate and market congestion hedging. In their written comments, they proposed a discount factor be applied as part of the economic calculation to reconcile for congestion hedging.
- + Calpine (Independent Generator) did not file comments, but during TAC they expressed that they objected to the urgency with which the NPRR was moved through the stakeholder process, and they believe that the work on the whitepapers is incomplete.
- + Shell (Independent Power Marketer) did not file comments, but they opposed the NPRR based on concerns over the placement of added future generation resources in the economic model. Due to a forecasted imbalance between load and generation in the model, ERCOT must add future generation resources to the model in order for it to solve. Shell noted that the specific placement of these added future generation resources in the model may affect congestion patterns and therefore may have an undue impact on the CCST results.

In response to concerns over how the added future generation in the CCST model is implemented, ERCOT has committed to file a new NPRR early in the new year. They noted during the stakeholder process that the placement of this generation affects more planning models than just CCST, so this issue needs to be addressed separately and changes be implemented more widely across other planning models.

While Staff recognizes the remaining issues which were identified through the stakeholder process, considering ERCOT’s commitment to continue to work on those issues with stakeholders Staff supports the approval of NPRR1247. Approving this NPRR allows the usage of this economic test at a critical juncture in transmission planning. With substantial large loads requesting to enter the ERCOT market in the foreseeable future, this test provides an added tool which may be utilized to demonstrate that certain transmission projects can offer cost benefits to consumers alongside the cost of building those projects.

- NPRR1248, *Correction to NPRR1197, Optional Exclusion of Load from Netting at EPS Metering Facilities which Include Resources* – This NPRR corrects language in Section 11.1.6 which was implemented following PUCT approval of NPRR1197, Optional Exclusion of Load from Netting at ERCOT-Polled Settlement (EPS) Metering Facilities which Include Resources.

The NPRR1197 2/8/24 PRS Report did not correctly reflect the PRS vote “to recommend approval of NPRR1197 as amended by the 2/7/24 Oncor comments as revised by PRS” in paragraph (6) of Section 11.1.6. This error carried through the ensuing 3/27/24 TAC Report and 4/23/24 Board Report, and was approved by the PUCT on 6/13/24.

This NPRR aligns the language within Section 11.1.6 with the intended PRS action from February 8, 2024.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1248 and believes the market impact for NPRR1248 properly aligns Protocol language within Section 11.1.6 with PRS-recommended language inadvertently omitted from NPRR1197 reports.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1249, *Publication of Shift Factors for All Active Transmission Constraints in the RTM* – This NPRR requires ERCOT to publish Shift Factors for all active transmission constraints in the Real-Time Market (RTM), not just the binding transmission constraints.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1249 and believes that with the publication of Shift Factors for all active transmission constraints, it provides a positive market impact by improving transparency and efficiency by enabling Market Participants to shadow all aspects of the market clearing results.
Sponsor	Steve Reedy, CIM View Consulting LLC (IMRE)

IMM Opinion	No opinion
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- NPRR1254, *Modeling Deadline for Initial Submission of Resource Registration Data* – This NPRR requires Resource Entities to submit the initial Resource Registration data for a Generator Interconnection or Modification (GIM) project, required by paragraph (6) of Planning Guide Section 6.8.1, Resource Registration, four months prior to target inclusion in the ERCOT Network Operations Model. This provides a one-month period for ERCOT and the Resource Entities to address errors or deficiencies consistent with the process outlined in Planning Guide Section 6.8.2, Resource Registration Process.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1254 and believes the market impact of adjusting the timeline for submitting the initial Resource Registration data for GIM projects will have a positive market impact by providing a one-month period for ERCOT and Resource Entities to address errors or deficiencies resulting in improved coordination.
Sponsor	ERCOT
IMM Opinion	No opinion

- NOGRR266, *Related to NPRR1239, Access to Market Information* This NOGRR moves from the MIS Secure Area to the public ERCOT website reports that do not contain ECEII. ERCOT Staff analyzed reports in the MIS Secure Area, along with existing Protocols for posting requirements, and identified no ongoing basis for holding in the MIS Secure Area reports determined to contain only information for a market audience and not ECEII.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR266 and believes it provides a positive market impact by improving access and transparency by moving reports that are not ECEII from the MIS Secure Area to the ERCOT website so the public can directly access reports without registering as a Market Participant and requesting ERCOT to issue a Digital Certificate, or without submitting an ERCOT Information Request.
Sponsor	ERCOT
IMM Opinion	No opinion

- NOGRR267, *Related to NPRR1240, Access to Transmission Planning Information* This NOGRR moves from the MIS Secure Area to the public ERCOT website reports that do not contain ECEII. ERCOT Staff analyzed reports in the MIS Secure Area, along with existing Protocols for posting requirements, and identified no ongoing basis for holding in the MIS

Secure Area reports determined to contain only Transmission planning information for a market audience, consisting of percentages of Transmission Outage totals by scheduling and type, and monthly reports that show the rates at which solutions converged in the State Estimator application and not ECEII.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR267 and believes it provides a positive market impact by improving access and transparency by moving reports that are not ECEII from the MIS Secure Area to the ERCOT website so the public can directly access reports without registering as a Market Participant and requesting ERCOT to issue a Digital Certificate, or without submitting an ERCOT Information Request.
Sponsor	ERCOT
IMM Opinion	No opinion

- *OBDRR053, Alignment with NPRR1131, Controllable Load Resource Participation in Non-Spin, and Minor Clean-Ups* This OBDRR aligns the Non-Spinning Reserve Deployment and Recall Procedure with revisions from NPRR1131, Controllable Load Resource Participation in Non-Spin, along with other minor clean-ups.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed OBDRR053 and believes the market impact for OBDRR053 maintains alignment between this Other Binding Document and the Protocols.
Sponsor	ERCOT
IMM Opinion	No opinion

- *PGRR116, Related to NPRR1240, Access to Transmission Planning Information* – This PGRR updates Planning Guide language to reflect the current practice of posting versions of the ERCOT Long-Term System Assessment (LTSA) and correspondingly updates the chart of data sets and designated classifications in paragraph (2) of Section 7.1, Planning Data and Information. The PGRR moves from the MIS Secure Area to the public ERCOT website Transmission Service Provider (TSP) Annual Planning Criteria and correspondingly updates the chart of data sets and designated classifications in paragraph (2) of Section 7.1.

This PGRR also updates Planning Guide language to reflect the current practice of posting on the ERCOT website the Demand and Energy Monthly report, adding a requirement to include 15-minute interval data that is included in a version of the report currently posted on only the MIS Secure Area. Finally, this PGRR clarifies the chart of data sets and designated

classifications in paragraph (2) of Section 7.1 of the Guide does not constitute posting requirements.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed PGRR116 and believes it provides a positive market impact by improving access and transparency by moving reports that are not ECEII from the MIS Secure Area to the ERCOT website so the public can directly access reports without registering as a Market Participant and requesting ERCOT to issue a Digital Certificate, or without submitting an ERCOT Information Request.
Sponsor	ERCOT
IMM Opinion	No opinion

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

PROJECT NO. 54445

**REVIEW OF PROTOCOLS ADOPTED § PUBLIC UTILITY COMMISSION
BY THE INDEPENDENT §
ORGANIZATION § OF TEXAS**

PROPOSED ORDER APPROVING ERCOT REVISION REQUESTS

This Order addresses thirteen proposed revisions to Electric Reliability Council of Texas (ERCOT) protocols. The Commission approves these revisions and accompanying market impact statements.

At its meeting on December 3, 2024, the ERCOT Board of Directors (Board) recommended Commission approval of the following thirteen proposed revisions:

- NPRR1180, Inclusion of Forecasted Load in Planning Analyses;
- NPRR1239, Access to Market Information;
- NPRR1240, Access to Transmission Planning Information;
- NPRR1245, Additional Clarifying Revisions to Real-Time Co-Optimization;
- NPRR1247, Incorporation of Congestion Cost Savings Test in Economic Evaluation of Transmission Projects;
- NPRR1248, Correction to NPRR1197, Optional Exclusion of Load from Netting at EPS Metering Facilities which Include Resources;
- NPRR1249, Publication of Shift Factors for All Active Transmission Constraints in the RTM;
- NPRR1254, Modeling Deadline for Initial Submission of Resource Registration Data;
- NOGRR266, Related to NPRR1239, Access to Market Information;
- NOGRR267, Related to NPRR1240, Access to Transmission Planning Information;
- OBDRR053, Alignment with NPRR1131, Controllable Load Resource Participation in Non-Spin, and Minor Clean-Ups;
- PGRR107, Related to NPRR1180, Inclusion of Forecasted Load in Planning Analyses; and
- PGRR116, Related to NPRR1240, Access to Transmission Planning Information.

On December 9, 2024, for each proposed revision, ERCOT filed a copy of its Board Report, which includes an ERCOT Market Impact Statement, and ERCOT Impact Analysis. These supporting ERCOT documents constitute the market impact analysis.

Commission Staff filed a memorandum on January 9, 2025, related to these revisions in which it recommends that the Commission approve the revisions.

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

1. The Commission approves NPRR1180 and accompanying market impact statement.
2. The Commission approves NPRR1239 and accompanying market impact statement.
3. The Commission approves NPRR 1240 and accompanying market impact statement.
4. The Commission approves NPRR1245 and accompanying market impact statement.
5. The Commission approves NPRR1247 and accompanying market impact statement.
6. The Commission approves NPRR1248 and accompanying market impact statement.
7. The Commission approves NPRR1249 and accompanying market impact statement.
8. The Commission approves NPRR1254 and accompanying market impact statement.
9. The Commission approves NOGRR266 and accompanying market impact statement.
10. The Commission approves NOGRR267 and accompanying market impact statement.
11. The Commission approves OBDRR053 and accompanying market impact statement.
12. The Commission approves PGRR107 and accompanying market impact statement.
13. The Commission approves PGRR116 and accompanying market impact statement.

Signed at Austin, Texas the _____ day of _____ 2025.

PUBLIC UTILITY COMMISSION OF TEXAS

THOMAS J. GLEESON, CHAIRMAN

KATHLEEN JACKSON, COMMISSIONER

COURTNEY K. HJALTMAN, COMMISSIONER