

Board Report

General and Site	X	X	X	X	X		X	Text	City:	City associated with the physical street address of the plant site.					R	
General and Site	X	X	X	X	X		X	Text	State:	State associated with the physical street address of the plant site.					R	
General and Site	X	X	X	X	X		X	Text	Zipcode:	Zip code associated with the physical street address of the plant site.					R	
General and Site	X	X	X	X	X		X	List	County:	County associated with the physical street address of the plant site.	R	R	R	R	R	
General and Site	X	X	X	X	X		X	Date	Site In-Service Date:	Date is the date when site was (or is planned to be) commissioned. Entered once initially for the Screening Study. Updated once for FIS. Updated once for the Full Registration. Updated finally for the site commissioning.	R	R	R	R	R	
General and Site	X	X	X	X	X		X	Date	Site Stop Service Date:	Model Ready Date when RE retires or relinquishes ownership of all equipment. Blank if not applicable/known.					O	

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General and Site	X	X	X	X	X		X	List	Congestion Management Zone for 2003:	This information can be found in the ERCOT Data Dictionary on the Planning and Operations Information website. For newer units, please contact ERCOT.					R	
General and Site	X	X	X	X	X		X	Y/N	Resource owned by NOIE?	Indicate Non Opt-In Entity Ownership of Resource	R	R	R	R	R	
General and Site	X	X	X	X	X		X	Y/N	Is Resource behind a NOIE Settlement Meter Point?	For Resources that are connected to the grid behind NOIE Settlement Meter Points					R	
General and Site	X	X	X	X	X		X		Number of EPS Primary meters:	Enter the total number of primary ERCOT-Polled Settlement (EPS) Meters associated with this site.					R	
General and Site	X	X	X	X	X			List (Transmission or Distribution)	Is Resource Transmission or Distribution Connected?	Refer to Protocol Section 2.1, Definitions, for the definition of a Resource.					R	
[RRGRR023: Insert "General and Site" rows below upon system implementation of NPRRs 1002, 1026, and 1029:]																
General and Site	X	X	X					Y/N	Is Resource a DC-Coupled Resource as defined in ERCOT Protocol Section 2.1,	Refer to ERCOT Protocol Section 2.1, Definitions, for the definition of a DC-Coupled						

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								Definitions?	Resource.						
General and Site			X				Y/N	Is Resource a Self-Limiting Resource as defined in ERCOT Protocol Section 2.1, Definitions?	Refer to ERCOT Protocol Section 2.1, Definitions, for the definition of a Self-Limiting Resource.						
General and Site	X	X	X	X	X		Y/N	Is Resource a part of a Self-Limiting Facility as defined in ERCOT Protocol Section 2.1, Definitions?	Refer to ERCOT Protocol Section 2.1, Definitions, for the definition of a Self-Limiting Facility.						
General and Site	X	X	X	X	X	X	Y/N	Is Resource claiming status as a Settlement Only Generator (SOG) as defined in ERCOT Protocol Section 2.1, Definitions?	Refer to Protocol Section 2.1, Definitions, for the definition of a Settlement Only Generator (SOG).					R	
[RRGRR031: Replace "General and Site - Is Resource claiming status as a Settlement Only Generator (SOG) as defined in ERCOT Protocol Section 2.1, Definitions?" above upon system implementation of NPRR995:]															
General and Site	X	X	X	X	X	X	Y/N	Is Resource claiming status as a Settlement Only Generator (SOG) or Settlement Only Energy Storage System (SOESS) as defined in ERCOT Protocol Section 2.1, Definitions?	Refer to Protocol Section 2.1, Definitions, for the definition of a Settlement Only Generator (SOG) and Settlement Only Energy Storage System (SOESS).					R	
<u>General and Site</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>Y/N</u>	<u>Is the Resource a Black Start Capable Resource?</u>	<u>Refer to Protocol Section 2.1, Definitions, for the definition of Black Start Capable Resource</u>					<u>R</u>	

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<u>General and Site</u>	X	X	X	X	X	X	X	Y/N	<u>Is the Resource capable of Isochronous Control?</u>	<u>Refer to Protocol Section 2.1, Definitions, for the definition of Isochronous Control Capable Resource.</u>					R	
General and Site	X	X	X	X	X		X	Y/N	Is Resource >10 MW?	Indicate if the Resource nameplate rating is greater than 10 MW (Gross). Required if Resource is claiming Settlement Only Generator (SOG) status.					C	
General and Site	X	X	X	X	X		X	Text	Printed Name:	Enter the Primary Contact person who can address ERCOT questions regarding Resource Registration submittal. Enter the contact's name, title, phone number, and email address.	R	R	R	R	R	
General and Site	X	X	X	X	X		X	Text	Title:	Enter the Title of the Primary Contact	R	R	R	R	R	
General and Site	X	X	X	X	X		X		Phone Number:	Enter the Phone Number for the Primary Contact	R	R	R	R	R	
General and Site	X	X	X	X	X		X		E-mail Address:	Enter the E-mail Address for the Primary Contact	R	R	R	R	R	

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General and Site	X	X	X	X	X		X	Text	Printed Name:	Enter the Secondary Contact person who can address ERCOT questions regarding Resource Registration submittal. Enter the contact's name, title, phone number, email address, and fax number.	O	O	O	O	O	
General and Site	X	X	X	X	X		X	Text	Title:	Enter the Title of the Secondary Contact				O	O	
General and Site	X	X	X	X	X		X		Phone Number:	Enter the Phone Number for the Secondary Contact				O	O	
General and Site	X	X	X	X	X		X		E-mail Address:	Enter the E-mail Address for the Secondary Contact				O	O	
Breaker Switch Data (as applicable)																
Breaker Switch Data	X	X	X	X	X			List	Description of Change	Select: description of change from drop down list: Add, Change or Delete					C	
Breaker Switch Data	X	X	X	X	X			enter all caps	Switch Name	Breaker or Switch name as provided in the ERCOT model, which must meet the character limitation of the system. Ensure				O	R	

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									device name is consistent throughout all Resource Registration information and one-line diagrams.						
Breaker Switch Data	X	X	X	X	X		enter all caps	ERCOT Station Name (Station Code or Station Mnemonic)	ERCOT Station Code Mnemonic where the breaker or switch is located				O	R	
Breaker Switch Data	X	X	X	X	X		Automatic	Switch Code	Concatenated code automatically provided				A	A	
Breaker Switch Data	X	X	X	X	X		Y/N	Is This A Fault Isolating Device (e.g. Circuit Breaker)	Select Y or N		R	R	R	R	
<u>Breaker Switch Data</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>		<u>Y/N</u>	<u>Does this device have Synchroscope?</u>	<u>Refer to Protocol Section 2.1, Definitions, for the definition of Synchroscope.</u>					<u>R</u>	
<u>Breaker Switch Data</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>		<u>Y/N</u>	<u>Does this device have Synchronism Check Relay?</u>	<u>Refer to Protocol Section 2.1, Definitions, for the definition of Synchronism Check Relay.</u>					<u>R</u>	
Breaker Switch Data	X	X	X	X	X		Opened/Closed	Normal Operating Status (when in service)	Select whether Open or Closed during normal operations		R	R	R	R	
Breaker Switch Data	X	X	X	X	X		kV	Voltage Level	Enter voltage level of this breaker or switch		R	R	R	R	

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Breaker Switch Data	X	X	X	X	X		MVA	Continuous Rating	Per definition of "Normal Rating" in Section 2 of the ERCOT protocols, the continuous MVA rating of a Transmission Element, including substation terminal equipment in series with a conductor or transformer, at the applicable ambient temperature. The Transmission Element can operate at this rating indefinitely without damage, or violation of NESC clearances.		R	R	R	R	
Breaker Switch Data	X	X	X	X	X		MVA	2-hr Emergency Rating	Per definition of "Emergency Rating" in Section 2 of the ERCOT protocols, the two-hour MVA rating of a Transmission Element, including substation terminal equipment in series with a conductor or transformer, at the applicable ambient		R	R	R	R	

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									temperature. The Transmission Element can operate at this rating for two hours without violation of NESC clearances or equipment failure.						
Breaker Switch Data	X	X	X	X	X			MVA	15-min Rating	Per definition of "15 Minute Rating" in Section 2 of the ERCOT protocols, The 15-minute MVA rating of a Transmission Element, including substation terminal equipment in series with a conductor or transformer, at the applicable ambient temperature and with a step increase from a prior loading up to 90% of the Normal Rating. The Transmission Element can operate at this rating for 15 minutes, assuming its pre-contingency loading up to 90% of the Normal		R	R	R	R

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									Rating limit at the applicable ambient temperature, without violation of NESC clearances or equipment failure. This rating takes advantage of the time delay associated with heating of a conductor or transformer following a sudden increase in current.						
Breaker Switch Data	X	X	X	X	X		enter all caps	Connected Device 1 thru 10	Enter device connected to this breaker or switch on Side 1 (can provide up to 10). Ensure device name is consistent throughout all Resource Registration information and one-line diagrams.				R for Device 1 C for 2 thru 10	R for Device 1 C for 2 thru 10	
Breaker Switch Data	X	X	X	X	X		enter all caps	Connected Device 1 thru 10	Enter device connected to this breaker or switch on Side 2 (can provide up to 10). Ensure device name is consistent throughout all Resource				R for Device 1 C for 2 thru 10	R for Device 1 C for 2 thru 10	

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										Registration information and one-line diagrams.						
Breaker Switch Data	X	X	X	X	X				Comments	Enter any comments regarding this breaker-switch data					O	
Breaker Switch Data	X	X	X	X	X			mm/dd /yyyy	Effective Date:	Date this breaker or switch was added, removed or updated in the model					R	

ERCOT Impact Analysis Report

RRGRR Number	<u>033</u>	RRGRR Title	Related to NPRR1164, Black Start and Isochronous Control Capable Identification
Impact Analysis Date	February 21, 2023		
Estimated Cost/Budgetary Impact	None.		
Estimated Time Requirements	No project required. This Resource Registration Glossary Revision Request (RRGRR) can take effect following implementation of Nodal Protocol Revision Request (NPRR) 1164, Black Start and Isochronous Control Capable Identification.		
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

There are no additional impacts to this RRGRR beyond what was captured in the Impact Analysis for NPRR1164.

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RRGRR Number	<u>035</u>	RRGRR Title	Related to NPRR1171, Requirements for DGRs and DESRs on Circuits Subject to Load Shedding
Date of Decision	August 31, 2023		
Action	Recommended Approval		
Timeline	Normal		
Proposed Effective Date	Upon implementation of Nodal Protocol Revision Request (NPRR) 1171, Requirements for DGRs and DESRs on Circuits Subject to Load Shedding		
Priority and Rank Assigned	Not Applicable		
Resource Registration Glossary Sections Requiring Revision	Section 2 – Unit Info - DG		
Related Documents Requiring Revision/Related Revision Requests	Nodal Operating Guide Revision Request (NOGRR) 250, Related to NPRR1171, Requirements for DGRs and DESRs on Circuits Subject to Load Shedding NPRR1171		
Revision Description	This Resource Registration Glossary Revision Request (RRGRR) adds data fields consistent with NPRR1171.		
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) <i>(please select all that apply)</i>		
Business Case	This RRGRR ensures that the Distribution Generation Resource (DGR) and Distribution Energy Storage Resource (DESR) information required by NPRR1171 is incorporated into the Resource Integration and Ongoing Operations (RIOO) system.		

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ROS Decision	<p>On 5/4/23, ROS voted unanimously to table RRGR035 and refer the issue to the Operations Working Group (OWG). All Market Segments participated in the vote.</p> <p>On 7/6/23, ROS voted unanimously to recommend approval of RRGR035 as submitted. All Market Segments participated in the vote.</p> <p>On 8/3/23, ROS voted unanimously to endorse and forward to TAC the 7/6/23 ROS Report and 3/29/23 Impact Analysis for RRGR035. All Market Segments participated in the vote.</p>
Summary of ROS Discussion	<p>On 5/4/23, participants requested OWG review RRGR035 along with NPRR1171 and NOGRR035.</p> <p>On 7/6/23, participants noted the OWG recommendation to endorse NPRR1171 as submitted, and advanced the related RRGR035 and NOGRR250.</p> <p>On 8/3/23, participants reviewed the 3/29/23 Impact Analysis.</p>
TAC Decision	<p>On 8/22/23, TAC voted unanimously to recommend approval of RRGR035 as recommended by ROS in the 8/3/23 ROS Report. All Market Segments participated in the vote.</p>
Summary of TAC Discussion	<p>On 8/22/23, TAC reviewed the ERCOT Opinion, ERCOT Market Impact Statement, and Independent Market Monitor (IMM) Opinion for RGRR035.</p>
ERCOT Board Decision	<p>On 8/31/23, the ERCOT Board voted unanimously to recommend approval of RRGR035 as recommended by TAC in the 8/22/23 TAC Report.</p>

Opinions	
Credit Review	Not Applicable
Independent Market Monitor Opinion	IMM has no opinion on RMGR035.
ERCOT Opinion	ERCOT supports approval of RRGR035.
ERCOT Market Impact Statement	ERCOT Staff has reviewed RRGR035 and believes the market impact for RRGR035 is identification of Ancillary Services that can be provided by DGRs and DESRs on feeders subject to Load shedding.

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Sponsor	
Name	Clayton Stice
E-mail Address	clayton.stice2@ercot.com
Company	ERCOT
Phone Number	512-248-6806
Cell Number	512-627-5020
Market Segment	Not Applicable

Market Rules Staff Contact	
Name	Brittney Albracht
E-Mail Address	Brittney.Albracht@ercot.com
Phone Number	512-225-7027

Comments Received	
Comment Author	Comment Summary
None	

Market Rules Notes

None

Proposed Guide Language Revision

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SECTION 2: RESOURCE REGISTRATION GLOSSARY - Effective February 1, 2023

Resource Registration Data													
Wind		Solar Photovoltaic (PV), applicable portions of column "Energy Storage System (ESS)" upon system implementation of NPRRs 1002, 1026, and 1029 for RRGRR023; or upon system implementation of NPRR995.											
Conventional Generation (Gen)		Combined Cycle (CC)											
Load Resources		Distributed Generation											
Notes		Field Name											
Definition / Detailed Description		Screening Study (SS) (R, C, O, A)											
Full Interconnect Study (FIS) - Steady-State, Short Circuit, and Facility (R, C, O, A)		FIS - Stability Study (R, C, O, A)											
Planning Model (R, C, O, A)		Full Registration (R, C, O, A)											
Unit Info - DG													
Unit Info - DG					-	X	List	Technology Type	(FS) Fossil Fuel Steam (GT) Gas Turbine (H) Hydro (W) Wind (S) Solar (X) Other				
[RRGRR031: Replace "Unit Info - DG - Technology Type" above with the following upon system implementation of NPRR995:]													
Unit Info - DG					-	X	List	Technology Type	(FS) Fossil Fuel Steam (GT) Gas Turbine (H) Hydro (W) Wind (S) Solar (BA) Battery (X) Other				

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Unit Info - DG						X	#	If Wind, Number of Turbines	Count total of wind turbines	R	R	R	R	R	
[RRGRR031: Insert "Unit Info - DG" rows below upon system implementation of NPRR995:]															
Unit Info - DG			X				X	MW	SODG or SOESS Nameplate MW Rating	If SODG or SOESS is an aggregation of multiple units, mathematical summation of nameplate ratings of all units in the aggregation.					
Unit Info - DG			X				X	MWh	If SODESS, Nameplate MWh Rating. If SODESS is an aggregation of multiple units MWh Rating of all ESSs in the aggregation.	If SODESS, mathematical summation of the nameplate MWh ratings of all battery modules in the ESS. If SODESS is an aggregation of multiple units, mathematical summation of nameplate MWh ratings of all ESSs in the aggregation.					
Unit Info - DG			X				X	%	For SODG that are aggregation of multiple units % of ESS capacity in the aggregation.	For an SODG that is an aggregation of multiple units, the portion of ESS MW capacity in the aggregation, in % of total SODG MW rating.					

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Unit Info - DG			X				X	%	For SODG that are aggregation of multiple units % of non-ESS capacity in the aggregation.	For an SODG that is an aggregation of multiple units, the portion of non-ESS MW capacity in the aggregation, in % of total SODG MW rating.						
Unit Info - DG							X	Y/N	Private Network / Cogen	A cogen is a generating facility that produces electricity and another form of useful thermal energy used for industrial, commercial, heating, or cooling purposes. N/A for DRG						
Unit Info - DG							X	MW	Amount of Self Serve for Cogen	Amount of the unit output used for self serve and not available for the grid						
Unit Info - DG							X	MW	Private Network Net Interchange	For private networks, the net interchange shall be provided along with gross MW and MVar per generating unit. (ERCOT Operating Guides)						
Unit Info - DG							X	MW	Private Network Gross Unit (MW)	For private networks, the net interchange shall be provided along with gross MW						

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									and MVar per generating unit. (ERCOT Operating Guides)						
Unit Info - DG						X	MVAR	Private Network Gross Unit (MVAR)	For private networks, the net interchange shall be provided along with gross MW and MVar per generating unit. (ERCOT Operating Guides)						
Unit Info - DG						X	List	Generic Fuel Category	1) Coal and Lignite 2) Combined Cycle greater than 90 MW 3) Combined Cycle less than or equal to 90 MW 4) Diesel (and all other diesel or gas-fired Resources) 5) Gas Steam Non-reheat Boiler or Boiler without air-preheater 6) Gas Steam Reheat Boiler 7) Gas Steam Supercritical Boiler 8) Hydro 9) Nuclear 10) Other Renewable (i.e. non-hydro renewable						

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									Resources) 11) Power Storage 12) Simple Cycle greater than 90 MW 13) Simple Cycle less than or equal to 90 MW						
Unit Info - DG						X	List	Generic Start-up / Operating Category	1) Base Load 2) Gas-Cyclic 3) Gas-Intermediate 4) Gas-Peaking 5) Renewable (Including Hydro)						
Unit Info - DG						X	All Caps	Substation Name for POD	Enter the name of the substation as provided by the TDSP. (Where the DG will be mapped.)					R	
Unit Info - DG						X	All Caps	Substation Code for POD	Enter the TDSP substation code as provided by the TDSP. (Where the DG will be mapped.)					R	
<u>Unit Info - DG</u>						X	<u>All Caps</u>	<u>DSP Identification of Operational Limitations</u>	<u>Enter Y if the DSP identified any operational limitations on Form 23Q and N if the DSP did not identify any such restrictions.</u>						
<u>Unit Info - DG</u>						X	<u>All Caps</u>	<u>Interconnecting Circuit Subject to Load Shed</u>	<u>Enter Y if the DSP indicated on Form 23Q that the DGR/DESR is on</u>						

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									a circuit subject to Load shed, and N if the DGR/DESR is on a circuit not subject to Load shed.						
Unit Info - DG						X		Transmission Bus POD (PTI Bus No)	Enter the transmission PTI bus number as provided by the TDSP. (Where the DG will be mapped.)					R	
Unit Info - DG						X	kV	Transmission Station Voltage	Enter the transmission level voltage of the TDSP station as provided by the TDSP. Normally this will be 69 kV or higher. (Where the DG will be mapped.)					R	
Unit Info - DG						X	All Caps	Transmission Station Load Name in Network Operations Model	Enter the Load Name as listed in the ERCOT model as provided by the TDSP. (Where the DG will be mapped.)					R	
Unit Info - DG						X	All caps	Resource Entity Name Owner	Enter the name of the Resource Entity who owns all or a portion of this unit.					R	
Unit Info - DG						X		Resource Entity Owner Duns Number	Enter the name of the Resource Entity/ Interconnecting Entity. The RE					R	

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[illegible]

ERCOT Impact Analysis Report

RRGRR Number	<u>035</u>	RRGRR Title	Related to NPRR1171, Requirements for DGRs and DESRs on Circuits Subject to Load Shedding
Impact Analysis Date	March 29, 2023		
Estimated Cost/Budgetary Impact	None.		
Estimated Time Requirements	No project required. This Resource Registration Glossary Revision Request (RRGRR) can take effect following implementation of Nodal Protocol Revision Request (NPRR) 1171.		
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

There are no additional impacts to this RRGRR beyond what was captured in the Impact Analysis for NPRR1171.

Board Report

VCMRR Number	<u>034</u>	VCMRR Title	Excluding RUC Approved Fuel Costs from Fuel Adders
Date of Decision	August 31, 2023		
Action	Recommended Approval		
Timeline	Normal		
Proposed Effective Date	November 1, 2023		
Priority and Rank Assigned	Not Applicable		
Verifiable Cost Manual Sections Requiring Revision	3.4, Additional Rules for Submitting Fuel Costs		
Related Documents Requiring Revision/Related Revision Requests	None		
Revision Description	This Verifiable Cost Manual Revision Request (VCMRR) provides that actual fuel purchases that were used to determine the Reliability Unit Commitment (RUC) Guarantee, as described in Protocol Section 9.14.7, Disputes for RUC Make-Whole Payment for Fuel Costs, shall not also be included when calculating fuel adders.		
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) <i>(please select all that apply)</i>		
Business Case	Pursuant to Section 3.4, a Filing Entity may file a fuel adder for a specific Resource. Fuel adders are used by ERCOT in various calculations, including the determination of Startup and minimum-energy caps, Make-Whole Payments, and the Mitigated Offer Cap		

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	<p>(MOC). The purpose of fuel adders is to compensate the Resource for the incremental cost of transporting, storing, and purchasing fuel that is not covered by the index fuel price used by ERCOT.</p> <p>Resources that received a RUC are able to recover their actual fuel cost by filing a dispute per Protocol Section 9.14.7. Given that Resources recover the cost of these fuel purchases via a dispute, it is inappropriate to also include these fuel purchases with Fuel adders. Otherwise, the Resource could recover the cost of the same fuel purchase multiple times via future Make-Whole Payments or clearing prices.</p>
WMS Decision	<p>On 8/3/22, WMS voted to table VCMRR034 and refer the issue to the Wholesale Market Working Group (WMWG). There were two abstentions from the Independent Generator (Luminant) and Independent Retail Electric Provider (IREP) (Gexa Energy) Market Segments. All Market Segments participated in the vote.</p> <p>On 2/6/23, WMS voted to table VCMRR034. There were five opposing votes from the Consumer (3) (Residential, CMC Steel, City of Eastland) and the Municipal (2) (CPS Energy, GP&L) Market Segments, and five abstentions from the Consumer (Dow), Cooperative (PEC), Independent Power Marketer (IPM) (SENA), and Municipal (2) (Austin Energy, BTU) Market Segments. All Market Segments participated in the vote.</p> <p>On 6/7/23, WMS voted to recommend approval of VCRMM034 as submitted. There was one opposing vote from the Independent Generator (Luminant) Market Segment, and three abstentions from the Independent Generator (Constellation), IPM (NG Renewables), and Investor Owned Utility (AEPSC) Market Segments. All Market Segments participated in the vote.</p> <p>On 7/12/23, WMS voted unanimously to endorse and forward to TAC the 6/7/23 WMS Report and 6/21/22 Impact Analysis for VCMRR034. All Market Segments participated in the vote.</p>
Summary of WMS Discussion	<p>On 8/3/22, both Staff and participants requested additional discussion, and referred the issue to the WMWG.</p> <p>On 2/6/23, participants debated recommending approval of VCMRR034 and whether discussion of the issues contemplated in VCMRR034 should be moved to TAC. Some participants noted that the language had been available for some time with no comment, that consumers continue to face risks associated with fuel costs, that additional changes to fuel adders can be taken up in the future as needed. Other participants requested additional time to develop language to mitigate risks, particularly to avoid impacts to Resources during heightened conservative operations, and opined</p>

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	<p>that as written, VCMRR034 incorrectly addresses fuel adder costs. ERCOT Staff noted recent implementation of Nodal Protocol Revision Request (NPRR) 1124, Recovering Actual Fuel Costs through RUC Guarantee, and NPRR1140, Recovering Fuel Costs for Generation Above LSL During RUC-Committed Hours.</p> <p>On 6/7/23, participants discussed initiating a holistic review of verifiable costs, and that VCMRR034 is the least complex of the issues.</p> <p>On 7/12/23, participants reviewed the 6/21/22 Impact Analysis.</p>
TAC Decision	On 7/25/23, TAC voted to recommend approval of VCMRR034 as recommended by WMS in the 7/12/23 WMS Report. There was one opposing vote in the Independent Generator (Luminant) Market Segment, and three abstentions in the Independent Generator (Calpine, ENGIE, Jupiter Power) Market Segments. All Market Segments participated in the vote.
Summary of TAC Discussion	On 7/25/23, TAC reviewed the ERCOT Opinion, ERCOT Market Impact Statement, and Independent Market Monitor (IMM) Opinion for VCMRR034. Some participants expressed concern that VCMRR034 creates difficulty with reconciling which costs are submitted and approved via the process versus fuel adders.
ERCOT Board Decision	On 8/31/23, the ERCOT Board voted unanimously to recommend approval of VCMRR034 as recommended by TAC in the 7/25/23 TAC Report.

Opinions

Credit Review	Not Applicable
Independent Market Monitor Opinion	IMM supports VCMRR034.
ERCOT Opinion	ERCOT supports approval of VCMRR034.
ERCOT Market Impact Statement	ERCOT Staff has reviewed VCMRR034 and believes the market impact for VCMRR034 is the correct compensation for Resources for actual fuel costs via the dispute process pursuant to Protocol Section 9.14.7.

Sponsor

Name	Ino Gonzalez
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E-mail Address	Ino.Gonzalez@ercot.com
Company	ERCOT
Phone Number	512-248-3954
Cell Number	
Market Segment	Not Applicable

Market Rules Staff Contact	
Name	Brittney Albracht
E-Mail Address	Brittney.Albracht@ercot.com
Phone Number	512-225-7027

Comments Received	
Comment Author	Comment Summary
Luminant 020823	Expressed concern for exacerbating the ongoing administrative burden for Generation Resources and ERCOT by both requiring additional Exceptional Fuel Cost submittals, ongoing RUC disputes, and complicating the submission and approval of fuel adders

Market Rules Notes

Please note the baseline Verifiable Cost Manual language in the following section(s) has been updated to reflect the incorporation of the following VCMRR(s) into the manual:

- VCMRR031, Clarification Related to Variable Costs in Fuel Adders (incorporated 8/1/23)
 - Section 3.4

Please note that the following VCMRR(s) also propose revisions to the following section(s):

- VCMRR037, Related to NPRR1172, Fuel Adder Definition, Mitigated Offer Caps, and RUC Clawback
 - Section 3.4

Proposed Verifiable Cost Manual Language Revision

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3.4 Additional Rules for Submitting Fuel Costs

Commented [BA1]: Please note VCMRR037 also proposes revisions to this Section.

- (1) Filing Entities that have been approved for verifiable costs will receive a default fuel adder of \$0.50/MMBtu, unless the Filing Entity elects to submit an actual fuel adder (\$/MMBtu) for each Resource for verification and approval by ERCOT. For a coal-fired or lignite-fired Resource, the default fuel adder will be set quarterly to the maximum of \$0.50/MMBtu or the Coal Fuel Adder (CF)(\$/MMBtu), where CF is determined by ERCOT quarterly as described in Section 14, Appendices, Appendix 11, Procedure for Determining the Fuel Adder for Coal and Lignite Resources with Approved Verifiable Costs. The default fuel adder will remain the default amount specified above until the Filing Entity establishes an actual fuel adder in those verifiable costs and the Filing Entity must continue to provide actual fuel costs as prescribed in paragraph (2) below. The fuel adder is included in the value of X for the Resource (VOXR) as described in Section 14, Appendix 6, Calculation and Application of Proxy Heat Rate and the Value of X for the Resource.
- (2) Any Filing Entity that submits an actual fuel adder must provide documentation that establishes the historical variable costs for fuel, transportation, spot fuel, storage, and any additional verifiable cost associated with fuel contracts that can be easily differentiated from the standard commodity cost of fuel and clearly attributable to the Resource for the period. The fuel adder for a rolling 12-month period is the difference between the Filing Entity's average fuel price paid (including only variable fees) during the period and the fuel price utilized by ERCOT for the corresponding Resource. The Filing Entity shall provide rolling 12-month supporting data to verify total fuel price for all purchased volumes to support the actual Resource fuel consumption. Data to support these costs should include, but are not limited to, accounting ledger entries, invoices, and copies of fuel contracts. In addition, the actual costs used to calculate the fuel adder may include variable costs associated with, but not limited to, the following categories: transportation, commodity, deliveries, storage, injection, withdrawal, and imbalance fees. Other variable costs not described herein may be included if approved by ERCOT.
- (3) Notwithstanding paragraph (2) above, Fuel Adders shall not include actual fuel purchases used in the calculation of the RUC Guarantee as described in Protocol Section 9.14.7, Disputes for RUC Make-Whole Payment for Fuel Costs.
- (4) Review and approval of fuel costs follows the same timeline as verifiable costs; however, ERCOT may require additional time to verify the fuel costs based on the complexity of the submission. In such case, ERCOT will notify the Filing Entity if additional time is needed. For clarification on the submission timeline for the fuel adder, please see the table below. The fuel adder will be implemented the first day of the month after fuel costs have been approved.

Submission Months	Submission Period	ERCOT Review Period ¹
March of previous year to February of current year	April	May-June

¹ ERCOT will approve fuel adders during the Review Period unless it determines additional time is needed.

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September of previous year to August of current year	October	November-December
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ERCOT Impact Analysis Report

VCMRR Number	<u>034</u>	VCMRR Title	Excluding RUC Approved Fuel Costs from Fuel Adders
Impact Analysis Date		June 21, 2022	
Estimated Cost/Budgetary Impact		None.	
Estimated Time Requirements		No project required. This Verifiable Cost Manual Revision Request (VCMRR) can take effect following 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