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Public Utility Commission of Texas

Memorandum

TO: Interim Chair Kathleen Jackson
Commissioner Will McAdams
Commissioner Lori Cobos
Commissioner Jimmy Glotfelty

FROM: Mariah Benson, Market Analysis Division
Harika Basaran, Market Analysis Division

DATE: October 26, 2023

RE: November 2, 2023, Open Meeting – Item No. 27
Project No. 54445 – *CY 2023 Review of Rules Adopted by the Independent Organization (Discussion and possible action)*

Before the Commission is one *Alignment* Nodal Operating Guide Revision Request (NOGRR). The Electric Reliability Council of Texas' (ERCOT's) Impact Analysis of this revision was filed in this project on September 27, 2023.¹ Alignment Revision Requests do not go through the ERCOT stakeholder process, but still require Commission approval. The Commission has already approved the related nodal protocol revision request, NPRR 1176, *Update to EEA Trigger Levels*, at the October 12, 2023, open meeting in this Project.² Commission Staff recommends approval of NOGRR259, *Alignment Changes for November 3, 2023 Nodal Operating Guide – NPRR1176*.

- NOGRR259, *Alignment Changes for November 3, 2023 Nodal Operating Guide – NPRR1176*. This NOGRR aligns Energy Emergency Alert (EEA) language in Section 4.5.3.3 with Protocol Section 6.5.9.4.2, EEA Levels.

Paragraph (6) of Section 1.3.1, Introduction, provides that ERCOT may make changes to the Nodal Operating Guide to maintain duplicate language between the Protocols and Nodal Operating Guide, and requires that Section 4.5.3.3 be modified only by an Alignment NOGRR.

Staff Recommendation	Approve
Board Action	N/A
Related Commission/Legislative Directive	N/A
TAC Opposition	N/A

¹ Notice of Submission of Alignment Revision Request, AIS Item No. 31 (Sep. 27, 2023).

² Order Approving Revision Requests, AIS Item No.34 (Oct. 12, 2023)

ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR259 and believes the market impact for NOGRR259 aligns the Nodal Operating Guide with current Protocols.
Sponsor	ERCOT
IMM Opinion	N/A

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

PROJECT NO. 54445

**CY 2023 REVIEW OF RULES
ADOPTED BY THE INDEPENDENT
ORGANIZATION**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

PROPOSED ORDER APPROVING ERCOT REVISION REQUEST

This Order addresses one revision to Electric Reliability Council of Texas (ERCOT) rules. The Commission approves the revision and accompanying market impact statement.

On September 27, 2023, ERCOT filed an ERCOT Market Impact Statement for the following Alignment Revision Request:

- NOGRR259, *Alignment Changes for November 3, 2023 Nodal Operating Guide* NPRRI176

The supporting ERCOT documents constitute the market impact analysis. Commission Staff filed a memorandum on October 26, 2023, related to this revision in which it recommends that the Commission approve this revision to the rules.

The Commission finds that this revision to the ERCOT rules are necessary for the proper functioning of the ERCOT market as demonstrated by the supporting material. The Commission issues the following order:

1. The Commission approves NOGRR259 and accompanying market impact statement.

Signed at Austin, Texas the _____ day of _____ 2023

PUBLIC UTILITY COMMISSION OF TEXAS

KATHLEEN JACKSON, INTERIM CHAIR

WILL MCADAMS, COMMISSIONER

LORI COBOS, COMMISSIONER

JIMMY GLOTFELTY, COMMISSIONER