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Public Utility Commission of Texas

Memorandum

TO: Chairman Thomas J. Gleeson
Commissioner Lori Cobos
Commissioner Jimmy Glotfelty
Commissioner Kathleen Jackson
Commissioner Courtney K. Hjaltman

FROM: Kim Van Winkle, Market Analysis Division

DATE: September 19, 2024

RE: September 26, 2024, Open Meeting – Item No. 6
Project No. 54445 – Review of Protocols Adopted by the Independent Organization (Discussion and possible action)

Before the Commission are seven new Nodal Protocol Revision Requests (NPRRs), one Nodal Operating Guide Revision Request (NOGRR), one Other Binding Document Revision Request (OBDRR), one Planning Guide Revision Requests (PGRR), and two Verifiable Cost Manual Revision Request (VCMRRs) 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 August 20, 2024, meeting. In addition, one Alignment NOGRR is included for approval.¹ The Board Reports (including ERCOT Market Impact Statements) and ERCOT Impact Analyses for the above revisions were filed in this project on August 22, 2024.² These documents are intended to provide an overview describing each revision. Commission Staff recommends approval of each of these revisions.

- *NPRR1216, Implementation of Emergency Pricing Program* This NPRR aligns the Protocols with the Public Utility Commission of Texas (PUCT) Order amending 16 Texas Administrative Code (TAC) § 25.509 in Project No. 54585 (54585 Order), which establishes an Emergency Pricing Program (EPP) for the wholesale electric market as required by Public Utility Regulatory Act (PURA) § 39.160. Additionally, this NPRR, along with the estimated implementation costs identified in the Impact Analysis, provides a framework for automating components of the EPP, specifically the activation and deactivation of the Emergency Offer Cap (ECAP), reporting and external communications, and the Settlement for operating losses.

¹ Alignment Revision Requests do not go through the stakeholder process but require Commission approval.

² Notice of Recommended Approval of Revision Requests by ERCOT Board of Directors, AIS Item No. 91 (August 22, 2024).

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Order amending 16 TAC § 25.509 in Project No. 54585
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1216 and believes the market impact for NPRR1216, along with OBDRR051, implements the EPP as directed by the PUCT.
Sponsor	ERCOT
IMM Opinion	No opinion

- *NPRR1217, Remove VDI Requirement for Deployment and Recall of Load Resources and ERS Resources* This NPRR removes the requirement for Load Resources and Emergency Response Service (ERS) Resources to be deployed using a Verbal Dispatch Instruction (VDI) from ERCOT and updates a reference in paragraph (3)(a) of Section 6.5.9.4.1 to be consistent with changes made in NPRR1176, Update to EEA Trigger Levels. The current use of multiple communication systems for the deployment of Load Resources and ERS Resources creates an unnecessary burden on the control room during Emergency Conditions. In addition to furthering efficiency, removing the VDI requirement will prevent the possibility of conflicting instructions.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1217 and believes it provides a positive market impact by reducing unnecessary burden on the control room by streamlining the current use of multiple communication systems for the deployment of Load Resources and ERS Resources during Emergency Conditions.
Sponsor	ERCOT
IMM Opinion	No opinion

- *NPRR1219, Methodology Revisions and New Definitions for the Report on Capacity, Demand and Reserves in the ERCOT Region (CDR)* This NPRR changes the methodologies for preparation of the Report on Capacity, Demand, and Reserves in the ERCOT Region (“CDR”) and incorporates a report release schedule. Other changes include new definitions to support the methodology changes and revisions to address outdated terms and add clarity to the methodology descriptions. Finally, Section 16.5.4, Maintaining and Updating Resource Entity Information, is updated to require Switchable Generation Resource (SWGR) owners to provide information on unavailable SWGR units for all seasons rather than just for the summer and winter. A revised SWGR data reporting form will be posted to the ERCOT website.

On July 31, 2024, TAC debated whether NPRR1219 should be tabled to await the PUCT’s pending reliability standard rulemaking and whether the CDR and pending reliability standard are independent of each other. Participants noted that NPRR1219 provides valuable

incremental improvements to the CDR and should be implemented timely for the December 2024 report, that provisions were discussed extensively at Supply Analysis Working Group (SAWG), and that no Market Participant had filed comments to NPRR1219 expressing concerns for methodology or otherwise.

Explanation of Opposing TAC Votes:

Lyondell Chemical and CMC Steel Texas (Industrial Consumers) believe that the TAC vote on NPRR1219 should have been tabled to allow TAC members to have time for further review given the complexity of the Effective Load Carrying Capability (ELCC) analysis for renewable generation and the importance of the CDR in policy reviews at the PUCT and the Texas Legislature. Unlike thermal generation, the output of wind and solar facilities is impacted both by the time of day and location of the resources given a particular weather pattern for that day. Load is also locationally impacted (such as cloud cover over a metro area during summer peak hours). These impacts are often interrelated (for instance, low wind and reduced solar output during cloudy, cooler days during the summer that also lowers load). As such, they concluded that more time to review and assess the approach used by ERCOT would be worthwhile to get the best estimates for future CDRs.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	Approved, with two opposing votes from the Consumer (CMC Steel, Lyondell Chemical) Market Segment, and four abstentions from the Consumer (2) (Residential, OPUC), Independent Generator (ENGIE), and IPM (SENA) Market Segments
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1219 and believes it provides a positive market impact by improving forecasts in the CDR given Resource mix trends, more closely aligning planned resource eligibility criteria with Planning Guide requirements, and incorporating ESR availabilities.
Sponsor	ERCOT
IMM Opinion	No opinion

Additional concerns raised by the opposing and abstaining parties were the timing of the request for urgent status and a lack of vote at WMS before coming back to PRS. ERCOT made it clear that the urgent status was needed if these changes would be incorporated in time for the December 2024 CDR.

Next, some parties expressed concern that the changes to the CDR were being done concurrently with the reliability standard rulemaking at the Commission. Because the CDR would provide a snapshot of the resource adequacy picture in ERCOT that could differ from the one provided by the assessment required by the Commission's reliability standard, some worried that it could potentially muddle the resource adequacy message for both the Commission and the legislature.

Other concerns raised included the timeline for updating ELCC values, with some parties requesting that these values be updated more frequently than every three years, and the NPRR's

application of ELCC being limited to wind, solar, and storage, but not to thermal generation and other resource types.

Staff strongly supports approval of the NPRR 1219. The original framework for this NPRR was originated at the Commission during discussions in Project No. 52373 *Review of Wholesale Electric Market Design*.³ This NPRR had been tabled and referred to WMS, which in turn referred it to the SAWG which has the specific task of *evaluating proposals, issues, and principles for market design as they pertain to resource adequacy and planning and operating reserves*. A CDR NPRR has been a standing SAWG agenda item since December 2023. Multiple presentations on the ELCC methodology, both by ERCOT and Astrape Consulting were made as well. To date there has been no comments filed for that NPRR during the stakeholder process other than by ERCOT.

The changes proposed by the NPRR are notably significant and necessary improvements over the current methodology. As ERCOT resource mix continues to evolve, reporting and accounting also needs to improve to accurately capture capacity, demand and reserves. If further refinements are necessary, those can be accomplished in future NPRRs. Staff disagrees that there is any interdependency between the reliability standard assessment and the CDR report. While both would provide a snapshot of the resource adequacy picture in ERCOT, the CDR provides the seasonal reserve margins based on the expected resource availability during the peak and net peak hours, and the reliability standard assessment would provide a more holistic view as to whether ERCOT is currently meeting, and is expected to continue to meet, the reliability standard established by the Commission.

- **NPRR1225, *Exclusion of Lubbock Load from Securitization Charges*** This NPRR updates the Protocols to align with the PUCT's decisions in Docket No. 56119, *Petition of Electric Reliability Council of Texas, Inc. for Expedited Declaratory Order Regarding Public Utility Regulatory Act Chapter 39, Subchapter N*; and Docket No. 56122, *Petition of Electric Reliability Council of Texas, Inc. for Expedited Declaratory Order Regarding Public Utility Regulatory Act Chapter 39, Subchapter M*. To comply with the PUCT's declaratory orders, ERCOT changed its Settlement systems to implement the PUCT-ordered exclusions to be effective on or before March 4, 2024, the day on which the transfer of Lubbock Power and Light (LP&L) retail Customers to Retail Electric Providers (REPs) began. This NPRR reflects in the Protocols those exclusions.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Declaratory Orders in Docket Nos. 56119 and 56122
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1225 and believes the market impact for NPRR1225 properly aligns Protocol language with as-built Settlement system

³ Project No. 52373 Commissioner McAdams' memo filed on May 25, 2022, AIS Item No.372 and discussed at the June 16, 2022 open meeting.

	calculations to exclude LP&L Load from Securitization uplift and default charges, as directed by the PUCT.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1230, *Methodology for Setting Transmission Shadow Price Caps for an IROL in SCED*
– This NPRR establishes a Shadow Price cap for congestion impacting an Interconnection Reliability Operating Limits (IROL).

ERCOT is required to ensure that power flows do not exceed any IROL on the ERCOT System in order to prevent system instability, uncontrolled separation, and cascading. Therefore, the Shadow Price cap of an IROL must be set at a value such that Security-Constrained Economic Dispatch (SCED) will continue to manage the IROL constraint even during periods of system-wide scarcity. This NPRR establishes the methodology for calculating the Shadow Price cap for IROLs. This NPRR will enable ERCOT to manage power flows within IROLs using existing operational and market tools instead of relying on manual intervention by ERCOT operators. The manual intervention methods currently being used introduce operational risk during periods of stressed system conditions.

Explanation of Opposing TAC Votes

The main reason given for the opposed votes was the potential increase in the load zone prices and preferring the current manual High Dispatch Limit (HDL) override practice. Some stakeholders expressed the need for advanced notice so they can properly hedge. A 30 days of notice requirement was added before any change to alleviate this concern.

Staff supports approval of NPRR 1230 and believes that the benefits of relying on SCED and market-based solutions is far better than relying on manual solutions.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	Approved, with two opposing votes from the Cooperative (LCRA) and Municipal (Austin Energy) Market Segment and four abstentions from the Cooperative (GSEC, PEC, STEC) and Independent Retail Electric Provider (IREP) (APG&E) Market Segments
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1230 and believes the market impact for NPRR1230 properly leverages existing market tools to provide additional ERCOT operator flexibility when managing IROLs.
Sponsor	ERCOT
IMM Opinion	Supports

- NPRR1231, *FFSS Program Communication Improvements and Additional Clarifications*
This NPRR provides additional clarifications and improvements to the Firm Fuel Supply Service (FFSS) process and procedures. These modifications were developed mostly based on lessons learned during 2023-2024 contract period.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1231 and believes the market impact for this NPRR implements effective improvements to the FFSS program which can be implemented before the 2024/2025 FFSS obligation period begins.
Sponsor	ERCOT
IMM Opinion	No opinion

- NPRR1233, *Modification of Weatherization Inspection Fees on the ERCOT Fee Schedule* – This NPRR adds a flat fee for federally owned generation units and adjusts the weatherization inspection fee for Transmission Service Providers (TSPs). Federally owned Generation Resources are not permitted to pay weatherization inspection fees unless an inspection takes place. Accordingly, the federal government has refrained from paying weatherization inspection fee charges when federally owned Generation Resources are not actually inspected during a given inspection cycle. As a solution, ERCOT proposes a specific fee for each actual inspection of a federally owned Generation Resource based on the average to-date cost per inspection for all Resource Entities and TSPs of \$4,475.04, which has been rounded to \$4,500 for inclusion in the revised fee schedule. Additionally, this NPRR increases TSP inspection fees to the same \$4,500 average cost per inspection, rather than the current \$3,000 rate per inspection, to better align the fee with actual costs incurred by ERCOT.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed NPRR1233 and believes it provides a positive market impact by adding a flat fee for inspection of federally owned generation units, which were otherwise reportedly precluded from paying their weatherization inspection invoices and modifying the per-inspection fee for TSPs to align with the actual average cost incurred by ERCOT to perform a weatherization inspection.
Sponsor	ERCOT
IMM Opinion	Supports

- NOGRR245, *Inverter-Based Resource (IBR) Ride-Through Requirements* – This Nodal Operating Guide Revision Request (NOGRR) replaces the current voltage ride-through requirements for Intermittent Renewable Resources (IRRs) with voltage ride-through requirements for Inverter-Based Resources (IBRs) and Type 1 and Type 2 Wind-powered Generation Resources (WGRs) and provides new frequency ride-through requirements for IBRs and Type 1 and 2 WGRs consistent with or beyond requirements identified in the new 2800-2022 - Institute of Electrical and Electronics Engineers (IEEE) Standard for Interconnection and Interoperability of Inverter-Based Resources (IBRs) Interconnecting with Associated Transmission Electric Power Systems (“IEEE 2800-2022 standard”).

ERCOT Board Decisions:

- On 4/23/24, the ERCOT Board remanded NOGRR245 to TAC.
- On 6/18/24, the ERCOT Board voted unanimously to table NOGRR245 to give more time to ERCOT and Joint Commenters (Invenergy Energy Management LLC; NextEra Energy Resources LLC; Southern Power Company; Avangrid Renewables LLC; Clearway Renew, LLC) to achieve consensus on the outstanding issues related to the exemption process for units which cannot meet the new standards.
- A consensus could not be reached, and parties decided best way to move forward was to allow for the bifurcation of the *hardware modification requirements and exemption standards and processes* into a subsequent NOGRR. Instead, IBRs and Type 1 and Type 2 WGRs that cannot meet the new ride-through requirements will need to submit a report to ERCOT and request for exemption or extension by April 1, 2025. The request must include documentation such that to give ERCOT an *accurate understanding of the physical limitations and maximum ride-through capability*.
- On 8/16/24 ERCOT filed comments to reflect the bifurcation and the request for exemption by April 1, 2025.
- On 8/20/24, the ERCOT Board voted unanimously to recommend approval of NOGRR245 as recommended by TAC in the 6/7/24 TAC Report *as amended by the 8/16/24 ERCOT comments*. The Board also recommended that the subsequent NOGRR be designated as a Board Priority to address the remaining details of the exemption process and to be considered at the Board's February 2025 meetings. TAC Leadership was instructed to provide detailed reports on the subsequent NOGRR at the October and December Board meetings.
- **During the Board meeting Chairman Gleeson asked if the PUCT rulemaking process is more appropriate than the stakeholder process to resolve some larger contentious policy issues like those bifurcated to a subsequent NOGRR. Staff expects more guidance for the next steps will be provided and communicated to all interested parties.**

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	N/A This version of NPRR was not voted at TAC.
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR245 as recommended for approval by the ERCOT Board in the 8/20/24 Board Report and believes the rate and severity of ride-through failures will be reduced as Resource Entities maximize their ride-through capability and implement the modified performance failure mitigation process. This version of NOGRR245 is a reasonable compromise that is responsive to most stakeholder concerns. Customers will likely continue to face exposure to the current high risk of instability and uncontrolled Outages until improvements are implemented by the Resource Entities of IBRs and Type 1 and Type 2 WGRs. As improved models are submitted as part of maximization efforts, ERCOT may discover reliability issues that had not been previously identified. Managing these reliability issues may lead to transmission congestion or additional transmission project needs.

Sponsor	ERCOT
IMM Opinion	No opinion

- OBDRR051, *Related to NPRR1216, Implementation of Emergency Pricing Program* – This Other Binding Document Revision Request (OBDRR) aligns the Methodology for Implementing ORDC to Calculate Real-Time Reserve Price Adder with the system changes required for the Emergency Pricing Program (EPP).

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	Emergency Pricing Program, Project 54585, 16 TAC Section 25.509
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed OBDRR051 and believes the market impact for OBDRR051, along with NPRR1216, implements the EPP as directed by the PUCT.
Sponsor	ERCOT
IMM Opinion	No opinion

- PGRR106, *Clarify Projects Included in Transmission Project Information and Tracking (TPIT) Report* – This PGRR defines transmission projects included in the Transmission Project Information and Tracking (TPIT) report. It clarifies that the report consists of Tier 1, 2, 3, and 4 projects while exempting those projects that meet the criteria in paragraph (2) of Section 6.4.1. This will make it easier for Market Participants to understand what projects qualify for inclusion in the TPIT report. This PGRR does not change the report itself and there will be no impact to what is currently reported.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed PGRR106 and believes that it provides a positive market impact by enhancing transparency which would improve Market Participants' understanding of projects that would qualify for inclusion in the TPIT Report.
Sponsor	ERCOT
IMM Opinion	No opinion

- VCMRR039, *Related to NPRR1216, Implementation of Emergency Pricing Program* – This Verifiable Cost Manual Revision Request (VCMRR) provides that actual fuel purchases that were used to determine the Operating Losses Payment Amount, as described in Protocol Section 6.8.2, Recovery of Operating Losses During an LCAP or ECAP Effective Period, shall not be included when calculating fuel adders. This will prevent double recovery of fuel expenses.

Staff Recommendation	Approve
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Board Action	Unanimously approved
Related Commission/Legislative Directive	Emergency Pricing Program, Project 54585, 16 TAC Section 25.509
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed VCMRR039 and believes the market impact for VCMRR039, along with NPRR1216 and OBDRR051, implements the Emergency Pricing Program (EPP) as directed by the PUCT.
Sponsor	ERCOT
IMM Opinion	No opinion

- VCMRR040, *Methodology for Calculating Fuel Adders for Coal-Fired Resources* – This VCMRR removes the necessity for ERCOT to purchase an annual coal price index subscription to use in the calculation of the quarterly manual coal fuel adder and describes a methodology for a Qualified Scheduling Entity (QSE) to submit “Actual Coal Fuel Adders” (ACFA) similar to the current process for natural gas Resources. This will result in reduced cost to ERCOT while still providing market participants avenue to recover their costs if needed.

Staff Recommendation	Approve
Board Action	Unanimously approved
Related Commission/Legislative Directive	N/A
TAC Opposition	None
ERCOT Market Impact Statement	ERCOT Staff has reviewed VCMRR040 and believes it provides a positive market impact by eliminating the requirement to purchase an annual coal price index subscription, thereby reducing costs; by removing the quarterly manual process of calculating and updating fuel adders for coal-fired Resources; and by aligning the ACFA submissions process to a process similar to fuel adder submissions for natural gas Resources.
Sponsor	ERCOT
IMM Opinion	No opinion

- Alignment NOGRR269, *Alignment Changes for October 1, 2024 Nodal Operating Guide – NPRR1217* This Nodal Operating Guide Revision Request (NOGRR) aligns Energy Emergency Alert (EEA) language in Section 4.5.3.3 with Protocol Section 6.5.9.4.2, EEA Levels. On August 20, 2024, the ERCOT Board recommended approval of NPRR1217, which modified language in Protocol Section 6.5.9.4.2. 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.

Alignment Revision Request do not go through the stakeholder process, but still require Commission approval.

Staff Recommendation	Approve
Board Action	N/A

Related Commission/Legislative Directive	N/A
TAC Opposition	N/A
ERCOT Market Impact Statement	ERCOT Staff has reviewed NOGRR269 and believes the market impact for NOGRR269 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 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 August 20, 2024, the ERCOT Board of Directors (Board) recommended Commission approval of the following twelve proposed revisions:

- NPRR1216, Implementation of Emergency Pricing Program;
- NPRR1217, Remove VDI Requirement for Deployment and Recall of Load Resources and ERS Resources;
- NPRR1219, Methodology Revisions and New Definitions for the Report on Capacity, Demand and Reserves in the ERCOT Region (CDR);
- NPRR1225, Exclusion of Lubbock Load from Securitization Charges;
- NPRR1230, Methodology for Setting Transmission Shadow Price Caps for an IROL in SCED;
- NPRR1231, FFSS Program Communication Improvements and Additional Clarifications;
- NPRR1233, Modification of Weatherization Inspection Fees on the ERCOT Fee Schedule;
- NOGRR245, Inverter-Based Resource (IBR) Ride-Through Requirements;
- OBDRR051, Related to NPRR1216, Implementation of Emergency Pricing Program;
- PGRR106, Clarify Projects Included in Transmission Project Information and Tracking (TPIT) Report;
- VCMRR039, Related to NPRR1216, Implementation of Emergency Pricing Program; and
- VCMRR040, Methodology for Calculating Fuel Adders for Coal-Fired Resources.

On August 22, 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.

In addition, ERCOT submitted one Alignment NOGRR for approval, with accompanying Market Impact Statement:

- Alignment NOGRR269, Alignment Changes for October 1, 2024 Nodal Operating Guide – NPRR1217.

Commission Staff filed a memorandum on September 19, 2024, 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 NPRR1216 and accompanying market impact statement.
2. The Commission approves NPRR1217 and accompanying market impact statement.
3. The Commission approves NPRR 1219 and accompanying market impact statement.
4. The Commission approves NPRR1225 and accompanying market impact statement.
5. The Commission approves NPRR1230 and accompanying market impact statement.
6. The Commission approves NPRR1231 and accompanying market impact statement.
7. The Commission approves NPRR1233 and accompanying market impact statement.
8. The Commission approves NOGRR245 and accompanying market impact statement.
9. The Commission approves OBDRR051 and accompanying market impact statement.
10. The Commission approves PGRR106 and accompanying market impact statement.
11. The Commission approves VCMRR039 and accompanying market impact statement.
12. The Commission approves VCMRR040 and accompanying market impact statement.
13. The Commission approves Alignment NOGRR269 and accompanying market impact statement.

Signed at Austin, Texas the _____ day of _____ 2024

PUBLIC UTILITY COMMISSION OF TEXAS

THOMAS J. GLEESON, CHAIRMAN

LORI COBOS, COMMISSIONER

JIMMY GLOTFELTY, COMMISSIONER

KATHLEEN JACKSON, COMMISSIONER

**COURTNEY K. HJALTMAN,
COMMISSIONER**