



## **Filing Receipt**

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**Control Number - 55999**

**Item Number - 113**

**PROJECT NO. 55999**

<b>CY 2025 REPORTS OF THE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ELECTRIC RELIABILITY COUNCIL</b>	<b>§</b>	
<b>OF TEXAS</b>	<b>§</b>	<b>OF TEXAS</b>

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S**  
**NOTICE OF PROTOCOL VIOLATIONS**

Electric Reliability Council of Texas, Inc. (ERCOT) hereby notifies the Public Utility Commission of Texas (Commission) of the following non-reliability related ERCOT Protocol violations:

**A. Incorrect Non-Spin Deployment Dispatch Instructions for Load Resources**

Under ERCOT Protocol Section 6.5.7.6.2.3(12)(b), ERCOT's Non-Spin deployment Dispatch Instructions must include "A MW level of capacity deployment ... for Load Resources equal to their awarded Non-Spin Ancillary Service Resource Responsibility." However, in practice, ERCOT's Non-Spin deployment Dispatch Instructions have been 150% of the higher of (1) that Non-Spin Ancillary Service Resource Responsibility or (2) what the QSE for that Load Resource has reported as the Load Resources' capability pursuant to ERCOT Protocol Section 6.3.1(1). ERCOT's historical practice is inconsistent with the requirement in Section 6.5.7.6.2.3(12)(b).

ERCOT's historical practice was implemented many years ago when Load Resources first began participating in the ERCOT market. Because these Resources have "blocky" responses (meaning their Load is either "on" or "off"), ERCOT allowed these Resources to provide a range of response. To address frequency issues, the 150% limit was carried over from that original limit for Non-Controllable Load Resources providing Responsive Reserve Service. Once Real Time Co-optimization is implemented in December 2025, this issue will be resolved because the deployment instruction will no longer include the additional capability available.

**B. Delayed Posting of ERS Report**

Under ERCOT Protocol Section 8.1.3.1.3(1), ERCOT is required to provide each QSE representing Emergency Responsive Service (ERS) Resources "not later than 45 days after the end of an ERS Standard Contract Term" with an availability report for that QSE's ERS portfolio for each ERS service type. The June through September 2024 report's due date was therefore November 14, 2024. However, the availability reports for the 30-minute ERS program were not

posted until November 15, 2024. Accordingly, ERCOT committed a violation of Section 8.1.3.1.3(1) by one day. The delay was caused by the unintended effects of a software update. To minimize recurrence, ERCOT has adjusted its process to allow more time to test and modify software scripts to resolve any issues that may occur with similar software updates.

### **C. Failure to Ensure Signing of Nondisclosure Agreement**

Under ERCOT Protocol Section 1.3.6(n), Protected Information or ERCOT Critical Energy Infrastructure Information that is incidentally part of a tour of the ERCOT control room may be disclosed to persons determined by ERCOT to be eligible to participate in the tour if, prior to accessing the ERCOT control room, such persons sign a nondisclosure agreement (NDA). However, on November 19, 2024, a tour that included a “through the window” view of the ERCOT control room was conducted for three governmental officials, but NDAs were not first obtained. To prevent reoccurrence, ERCOT’s internal procedure was updated so that prior to any tour, Security notifies both the requesting ERCOT employee and Control Room Management as to whether those in the group have filled out the NDA and are therefore allowed to view the ERCOT control room.

### **CONCLUSION**

ERCOT takes its responsibilities under the ERCOT Protocols seriously and is prepared to discuss these matters in further detail at the Commission’s request.

Dated: April 3, 2025

Respectfully submitted,

/s/ Katherine Gross

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