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| NPRR Number | [1084](http://www.ercot.com/mktrules/issues/NPRR1084) | NPRR Title | Improvements to Reporting of Resource Outages and Derates |
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| Date | July 14, 2021 |
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| Submitter’s Information |
| Name | Michele Richmond |
| E-mail Address | michele@competitivepower.org |
| Company | Texas Competitive Power Advocates (TCPA) |
| Phone Number |  |
| Cell Number | 512-653-7447 |
| Market Segment | Not applicable |

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| Comments |

TCPA appreciates the opportunity to provide comments on Nodal Protocol Revision Request (NPRR) 1084.  While we may have additional comments, initial concerns are regarding inclusion of an expected return-to-service date. First, a return-to-service date that is published provides competitors with sensitive market information that will impact bids, price offers, and may create market manipulation concerns. Second, a return-to-service date is an estimate and may change depending on the issues encountered during the repair process, availability of parts and personnel needed to perform work, and other variables that are not in control of the Resource owner. Publishing the date sets an expectation that may or may not be attainable and opens Resource owners to unnecessary public speculation that adds nothing to reliability or operational performance. We respectfully request this NPRR be tabled at the July 15, 2021 Protocol Revision Subcommittee (PRS) meeting to allow for additional vetting of the real-world impacts to Resource operations. We further ask the NPRR be referred to the Wholesale Market Subcommittee (WMS) for additional review and discussion.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None