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| NPRR Number | [1108](http://www.ercot.com/mktrules/issues/NPRR1108) | NPRR Title | ERCOT Shall Approve or Deny All Resource Outage Requests |
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| Date | March 25, 2022 |
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| Submitter’s Information |
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| Market Segment | N/A |

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| Comments |

TCPA appreciates the ERCOT Board’s desire to move this NPRR forward. However, the methodology and limits, essential information for generators to provide specific feedback, were not posted by ERCOT until March 7, 2022 – the same day the Board meeting began.

TCPA supports the comments filed by Luminant Generation Company on March 23, 2022 and echoes the concern that all questions and issues be properly addressed before this NPRR goes live, in order to mitigate unintended consequences that will exacerbate resource adequacy in ERCOT. TCPA members are attempting to develop an alternative that will address ERCOT needs, while also ensuring thermal generators are able to take needed planned outages to ensure the continued safe and reliable operation of the thermal fleet.

The proliferation of renewable resources has increased the volatility of the ERCOT grid, such that thermal resources are provided little to no flexibility in taking needed planned outages according to the methodology proposed in NPRR1108, and the outage limits are based on ERCOT’s worst case scenario of renewable output and load expected on the system. Conservative operating posture may be appropriate for day-to-day operations but not for determining planned outages allowed across a long-term window.

Additionally, TCPA is concerned that ERCOT’s proposal only requires approval from the thermal and hydro resources, while wind and solar resources will continue to be automatically approved. This inequitable treatment appears at odds with the multiple policy directives from the Governor, Legislature, and Commission to support the dispatchable generation fleet.

As more renewable resources come online, volatility will increase and dispatchable capacity will get squeezed to complete outages in smaller windows with less flexibility. Increased outage restrictions will make it harder to move outages in response to near-term weather events or logistical hurdles, strongly incentivizing generators to stick firmly to their approved outage schedule or risk losing the ability to complete the outage before the outage window closes.

It is important that recommended maintenance be completed across the outage season and that historical planned outages be used as part of the equation. In addition, resources that adjust outages in response to system needs should be moved to the front of the line during that outage season, rather than be penalized for assisting in meeting a near-term reliability need.

TCPA looks forward to working with ERCOT and other stakeholders, including Commission Staff, to ensure both resource adequacy and maintenance needs are properly addressed. We look forward to responses to the questions provided in Luminant’s comments, as they are applicable to all thermal generators.

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| Revised Cover Page Language |

None

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| Revised Proposed Protocol Language |

None