

## **Position One**

### **Give ERCOT ISO one whole segment vote in the regional processes**

The ERCOT ISO shall have one vote on the RSC. The ERCOT ISO is significantly impacted by the development, applicability, and responsibility for compliance with numerous NERC (and, eventually, Regional) Reliability Standards Requirements. ERCOT is the Registered Entity responsible for compliance with more Standards and more Requirements than any other entity in the region. As such, the ERCOT ISO should have equal status as an entity participating in the standards development process, the activities of the RSC, and all relevant responsibilities associated with those processes and activities.

ERCOT having one full vote on the RSC is also consistent with the voting status of every other independent system operator (ISO) or regional transmission operator (RTO) in North America on their respective RSCs, as well as with the ERCOT ISO's one full vote on the ERCOT and Texas RE Boards of Directors.

The ERCOT ISO has been designated by the Public Utility Commission of Texas (PUCT) to be the ISO for the ERCOT Interconnection. The ERCOT ISO is assigned responsibility to ensure reliable operations within the ERCOT Interconnection. This assignment gives multiple functional responsibilities to the ERCOT ISO. The ERCOT ISO directs and coordinates system planning, operations planning, and system operations activities in conjunction with multiple ERCOT entities, including, but not limited to, Resource Entities, Transmission and Distribution Service Providers, Qualified Scheduling Entities, Load-Serving Entities, and Purchasing-Selling Entities. In these roles, the ERCOT ISO has the most prominent responsibility for the reliability of bulk electric system operations for the ERCOT Interconnection.

Moreover, the ERCOT ISO is registered with NERC as the responsible entity for many of the NERC-defined "Functional Entities". NERC will hold the registered "Functional Entities" accountable for performance in compliance with the applicable standards Requirements. At present, the ERCOT ISO is registered as the Reliability Coordinator (RC), the Transmission Operator (TOP), the Balancing Authority (BA), the Interchange Authority (IA), the Planning Authority (PA), the Resource Planner (RP), and the Transmission Service Provider (TSP).

The purpose of Reliability Standards is to ensure the reliability of bulk electric system operations, and given the ERCOT Interconnection's market structure and reliability mechanisms, ERCOT ISO possesses invaluable information that can inform the RSC's review of regional adjustments that are required. ERCOT ISO is eager to become a member of the RSC and begin contributing to the important work of the Committee, and believes that, in light of all the facts, one vote is appropriate.

On the other hand, there is no valid reason to arbitrarily assign ERCOT one-fourth of a vote. If four coops attend an ERCOT meeting, they effectively each get one-fourth vote within their segment. But if two show up, they each get half-votes, and if Coop X is the only one to show up, Coop X gets 1 vote. Why the ISO segment is the only one that should be automatically and permanently diminished by 75 percent is not clear.