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Public Utility Commission of Texas

Julia Harvey, Competitive Markets Division
Steven Mack, Legal Division
1701 North Congress Avenue
Austin, TX 78711

June 5, 2017

Re: Project No. 47199, Project to Assess Price Formation Rules in ERCOT's Energy-Only Market

Dear Ms. Harvey and Mr. Mack,

CPS Energy is sending this letter in support of Vistra's letter to you dated June 1, 2017. CPS Energy also looks forward to participating in the discussion of the recommendations made by Drs. Pope and Hogan in their paper, "Priorities for the Evolution of an Energy-Only Market Design in ERCOT." Much like Vistra, CPS Energy believes that the schedule set forth in the memo filed May 31, is too aggressive in light of the significant changes recommended in the paper and the analysis and consideration that must be performed in order to respond thoughtfully to your questions.

CPS Energy would go a step further than Vistra and suggest that the Staff begin the review of the paper by holding a workshop where the authors and/or sponsors of the paper can present it and answer questions. Additionally, CPS Energy believes that the market changes envisioned in this paper are comprehensive enough that waiting for a third commissioner to be seated before that workshop is held will allow all commissioners to have the benefit of hearing discussion on these important market issues.

Sincerely,

Adrienne Brandt
CPS Energy
Energy Market Policy
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