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PUBLIC UTILITY COMMISSION
FILING CLERK

June 6, 2017

Julia Harvey, Competitive Markets Division
Steven Mack, Legal Division
Public Utility Commission of Texas
1701 North Congress Avenue
Austin, Texas 78711

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

Dear Ms. Harvey and Mr. Mack:

In response to the Public Utility Commission of Texas (PUC) Staff's (Staff) Memorandum of May 31, 2017, proposing a project scope and schedule for Commission review at the June 7, 2017 Open Meeting regarding the report sponsored by NRG Energy, Inc. and Calpine Corp. entitled "Priorities for the Evolution of an Energy-Only Electricity Market Design in ERCOT" (the Report), Lower Colorado River Authority (LCRA) offers the following comments for the Commission's review and evaluation.

LCRA appreciates the opportunity to comment on the recommendations made in the above-referenced report and believes, much like Vistra Energy and CPS Energy, that developing a thorough analysis of the Report's recommendations and thoughtful answers to the PUC's questions will require more time than is proposed in the Staff memorandum. Additionally, LCRA believes it would be helpful if Dr. Hogan and Dr. Pope could be available for a workshop to discuss their findings with market participants.

We believe additional time is needed because the recommendations in the Report are substantive market changes with potentially broad impacts, costs and benefits. LCRA would like the opportunity to evaluate the implications of the recommendations and whether the recommendations effectively address any inefficiencies in the current market.

LCRA appreciates the opportunity to comment on the Staff memorandum and will be happy to answer any questions the Commission may have with respect to these comments.

Sincerely,

Leigh Sebastian
Managing Associate General Counsel