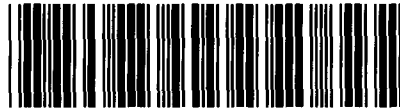




Control Number: 49779



Item Number: 1137

Addendum StartPage: 0



MARKETING
SYSTEMS
GROUP

September 18, 2019

Commission's Filing Clerk
Public Utility Commission of Texas
1701 North Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

2019 SEP 23 AM 11:22
PUBLIC UTILITY COMMISSION
FILING CLERK

Re: Project No. 49794

Dear Public Utility Commission of Texas,

On behalf of Marketing Systems Group, LLC ("MSG") a registered broker in Texas (Registration number: 802693727), we are writing in response to a notice for written comments regarding the Public Utility Commission of Texas ("Commission")'s proposed changes to add new sections 16 TAC §§ 25.112 and 25.486 and amend 16 TAC §§ 25.5, 25.8, 25.472, 25.473, 25.474, 25.475, 25.482, 25.485, 25.491, and 25.492, collectively referred to as "Project No. 49794".

Our company strongly encourages the adoption of these changes regarding Brokers and the registration process. Having a clear and concise registration process will ensure that the broker industry remains competitive and focused on serving clients in the best possible way.

We are in support of the quick turnaround proposed by the Commission regarding the application process. Expedited response times would mean that brokers in Texas could begin serving customers quickly, which would increase the efficiency in the electric market. Also, the three year renewal period will also help to increase the productivity and efficiency of the broker market.

We encourage you to adopt the consumer protection changes, as we fully support a market where clients are fully informed and can thus make informed decisions. These changes would not impact our business model, as we already place high value on consumer protection.

Although the Commission did not specify this directly in the proposed changes, we would urge the Commission to require brokers to procure bonds or maintain minimum accounts as part of the registration process under §25.112 (b) (10).

Finally, we would like to express out concern regarding §25.486 (d) (5), which states brokers must disclose to clients how brokers will be compensated for providing brokerage services including the method of calculation for the compensation. We regard this information as highly confidential, specifically how we calculate our fees. Furthermore, it is not industry standard to disclose this information.

We look forward to the positive resolution of Project No. 49794.

Thank you for your consideration of this comment.

Sincerely,

Brett Jurishi
Marketing Systems Group
27 N Wacker Dr. Ste 560
Chicago, IL 60606

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