



Control Number: 51812



Item Number: 108

Addendum StartPage: 0



March 9, 2021

Via Electronic Filing

Public Utility Commission of Texas
1701 North Congress Avenue
Austin, Texas 78711-3326

Re: Project No. 51812, *Issues Related to the State of Disaster for the February 2021 Winter Weather Event*

Dear Chairman D'Andrea:

Guadalupe Valley Electric Cooperative, Inc. ("GVEC") files this letter regarding the Public Utility Commission of Texas's ("Commission") February 15, 2021 Order – Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (the "February 15 Order").

As one of the largest electric cooperatives in Texas, GVEC serves more than 85,000 meters in our service area spanning 3,500 square miles over 13 counties. GVEC respectfully requests that the Commission enforce, or, in the alternative, clarify, its February 15 Order¹ to ensure that immediately after consumer firm load shed ended at 23:55 on February 17, 2021, administrative price adders were removed from the real time energy market clearing prices. The economic effect of not enforcing, or in the alternative not clarifying, the February 15 Order will be hardship and financial detriment to our members for years to come. GVEC supports the comments filed by Pedernales Electric Cooperative, Bandera Electric Cooperative, Bluebonnet Electric Cooperative and the City of San Marcos ("Joint Commenters") filed in this docket on March 9, 2021.

GVEC requests the Commission enforce its February 15 Order by directing the Electric Reliability Council of Texas ("ERCOT") to remove the system-wide offer cap price adder from the real-time energy prices for the 32 hours firm load was not being shed. This action is entirely within the Commission's authority and would correct the financial penalty that Load Serving Entities incurred for acting quickly in a humanitarian way to stop the suffering of Texans and restore power as quickly as possible. Such an order would also clearly resolve this issue, providing regulatory certainty for the market participants, a result that

¹ Project No. 51617, *Oversight of the Electric Reliability Council of Texas*, Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (Feb. 15, 2021) (refiled in Project No. 51812). The February 15, 2021 Order was replaced by an Order on February 16, 2021, but the February 16 Order did not change the section of the February 15 Order addressed here.



all market participants desire. The Commission has authority to enforce, or clarify if necessary, its February 15 Order as explained in the comments filed by the Joint Commenters. GVEC fully supports and agrees with those Comments.

GVEC appreciates the opportunity to provide these comments to the Commission.

Respectfully,

GUADALUPE VALLEY ELECTRIC COOPERATIVE, INC.

A handwritten signature in black ink, which appears to read "Darren Schauer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Darren Schauer
General Manager
And Chief Executive Officer