



Control Number: 51812



Item Number: 133

Addendum StartPage: 0



2905 Westward Dr. Nacogdoches, Texas 75964-1231
 P. O. Box 631623 Nacogdoches, Texas 75963-1623
 P (936) 560-9532 F (936) 560-9215 www.etec.coop

The Power of East Texas™

RECEIVED
 2021 MAR 10 PM 3:22
 PUBLIC UTILITY COMMISSION
 FILING CLERK

March 10, 2021

Via Electronic Filing

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

**Re: ETEC Comments Regarding February 15, 2021 Order in Project No. 51812,
 Issues Related to the State of Disaster for the February 2021 Winter Weather
 Event**

Dear Chairman D’Andrea:

East Texas Electric Cooperative, Inc. (“ETEC”) files this letter in support of the Joint Comments Regarding February 15, 2021 Order filed on March 9, 2021 by Bandera Electric Cooperative, Inc., Bluebonnet Electric Cooperative, Inc., Pedernales Electric Cooperative, Inc., and the City of San Marcos, Texas and the Comments Regarding February 15, 2021 Order filed by Brazos Electric Cooperative, Inc.

ETEC is a not-for-profit electric generation and transmission (“G&T”) cooperative with headquarters in Nacogdoches, Texas. ETEC serves eight member-owned electric cooperatives, which includes one G&T cooperative, Northeast Texas Electric Cooperative, Inc., and seven distribution cooperatives.¹ Collectively, ETEC’s member cooperatives purchase power from ETEC and ultimately provide retail electric service to approximately 345,000 meters in 46 counties in East Texas.

ETEC respectfully requests that the Commission enforce, or, in the alternative, clarify, its February 15 Order² to ensure that immediately after consumer firm load shed ended at 23:55 on

¹ ETEC’s and Northeast Texas Electric Cooperative, Inc.’s cooperative members include: (a) Bowie-Cass Electric Cooperative, Inc. (b) Cherokee County Electric Cooperative Association, (c) Deep East Texas Electric Cooperative, Inc., (d) Houston County Electric Cooperative, Inc., (e) Jasper-Newton Electric Cooperative, Inc., (f) Panola Harrison Electric Cooperative, Inc. (g) Rusk County Electric Cooperative, Inc., (h) Sam Houston Electric Cooperative, Inc., (i) Upshur Rural Electric Cooperative Corp., and (j) Wood County Electric Cooperative, Inc.

² 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

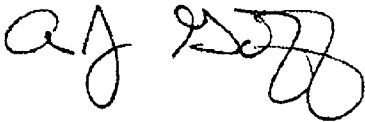


February 17, 2021, administrative price adders were removed from the real time energy market clearing prices. The economic effect of not enforcing or clarifying the February 15 Order will be hardship and financial detriment to our members for years to come. ETEC supports the comments filed by Pedernales Electric Cooperative, Bandera Electric Cooperative, Bluebonnet Electric Cooperative and the City of San Marcos (“Joint Commenters”) and Brazos Electric Cooperative, Inc. filed in this docket on March 9, 2021.

ETEC 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 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. For these reasons, the recommendation of the Independent Market Monitor should be followed, and the artificial \$9,000 price for energy should be reduced after ERCOT rescinded its order to shed load.

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

Sincerely,

Handwritten signature of AJ Goff, consisting of two distinct cursive initials.

AJ Goff
Interim CEO and General Manager
East Texas Electric Cooperative, Inc.

15 Order”). 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.