



Control Number: 51812



Item Number: 144

Addendum StartPage: 0

P.O. Box 47  
117 North Street  
Douglassville, Texas 75560



Phone: (903) 846-2311  
Toll Free: (800) 794-2919  
Fax: (903) 846-2406

March 10, 2021

**Via Electronic Filing**

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

**Re: Bowie-Cass Electric Cooperative, Inc. Comments Regarding February 15, 2021 Order in Project No. 51812, *Issues Related to the State of Disaster for the February 2021 Winter Weather Event***

RECEIVED  
2021 MAR 11 AM 10:00  
PUBLIC UTILITY COMMISSION  
FILING CLERK

Dear Chairman D'Andrea:

Bowie-Cass Electric Cooperative, Inc. 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 filed by East Texas Electric Cooperative, Inc. on March 10, 2021.

Bowie-Cass Electric Cooperative, Inc. is a not-for-profit electric cooperative that serves about 27,000 members in Texas. Bowie-Cass Electric Cooperative, Inc. respectfully requests that the Commission enforce, or, in the alternative, clarify, its February 15 Order<sup>1</sup> 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 clarifying the February 15 Order will be hardship and financial detriment to our members for years to come. Bowie-Cass Electric Cooperative, Inc. supports the comments and recommendations filed by Pedernales Electric Cooperative, Bandera Electric Cooperative, Bluebonnet Electric Cooperative and the City of San Marcos ("Joint Commenters") and East Texas Electric Cooperative, Inc. filed in this docket on March 9 and 10, 2021, respectively.

<sup>1</sup> 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 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.

Bowie-Cass Electric Cooperative, Inc. 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 once ERCOT rescinded its order to shed load.

Bowie-Cass Electric Cooperative, Inc. thanks the Commission for the opportunity to provide comments on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Boyd". The signature is written in a cursive style with a large, looping "B" at the end.

Mark A. Boyd  
General Manager/CEO  
Bowie-Cass Electric Cooperative, Inc.