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PROJECT NO. 51812

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ISSUES RELATED TO THE STATE § PUBLIC UTILITY COMMISSION
OF DISASTER FOR THE §
FEBRUARY 2021 WINTER § OF TEXAS
WEATHER EVENT §

FILED
PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMENTS REGARDING
FEBRUARY 15, 2021 COMMISSION ORDER**

United Electric Cooperative Services, Inc. ("United EC") files these comments in support of the Comments Regarding February 15, 2021 Order filed by Brazos Electric Cooperative, Inc. on March 10, 2021 and 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.

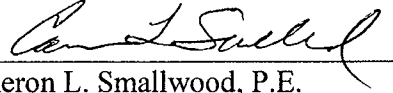
United EC is a distribution cooperative member of Brazos Electric Cooperative, Inc. ("Brazos Electric"). For the reasons outlined by Brazos Electric in its March 9, 2021 Comments, United EC respectfully requests that the Commission enforce, or in the alternative clarify, its February 15 Order¹ to ensure that immediately after customer firm load shed ended at 23:55 on February 17, 2021, energy market clearing prices are returned to normal without any administrative price adders. Because United EC placed the immediate humanitarian needs of its members above financial interests and restored power as quickly as possible after the load-shed directive lifted, United EC's members and United EC now face significant financial harm.

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Market Monitor should be followed, and the artificial \$9,000 price for energy should be reduced after ERCOT rescinded its order to shed load. United EC files these comments only with respect to the requested enforcement or clarification by the Public Utility Commission of Texas ("Commission") ordering ERCOT to take actions consistent with the Commission's February 15 Order by ordering ERCOT to remove the administrative adders as of 23:55 on February 17 when the firm load shed requirements were lifted, and these comments are expressly submitted without prejudice to or waiver by United EC

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) (herein, "February 15 Order") (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.

of any of its or its members' rights or defenses, including, but not limited to any defenses as to or rights to object to ERCOT orders referenced or the collection or charging by ERCOT or others of energy prices which include in any way the system-wide offer cap ("SWCAP").

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Cameron L. Smallwood", written over a horizontal line.

Cameron L. Smallwood, P.E.
Chief Executive Officer/General Manager
United Electric Cooperative Services, Inc.