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**ISSUES RELATED TO THE
STATE OF DISASTER FOR THE
FEBRUARY 2021 WINTER
WEATHER EVENT**

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**BEFORE THE
PUBLIC UTILITY COMMISSION
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS**

**SUPPLEMENTAL COMMENTS OF ACCENT ENERGY TEXAS, LP IN SUPPORT OF
PETITION TO IMPLEMENT THE RECOMMENDATIONS OF THE INDEPENDENT
MARKET MONITOR**

TO THE HONORABLE COMMISSIONERS OF THE PUBLIC UTILITY COMMISSION OF TEXAS:

Accent Energy Texas, LP, d/b/a IGS Energy (“IGS”), files these comments in response to statements made by the Public Utility Commission of Texas (“Commission”) during its March 5, 2021 open meeting. During that meeting, the Commission declined to adopt the recommendation of the Independent Market Monitor (“IMM”) to reprice real-time energy market prices during the February 2021 Winter Weather Event (“Winter Storm”), citing concern that the IMM’s recommendation would disrupt stakeholders’ settled expectations. Conversely, the Commission indicated that the recommendation by the IMM and other stakeholders to re-price real-time Ancillary Services (“AS”) during that period would be subject to further consideration, presumably in recognition of the Commission’s prior statement¹ that AS should be contrasted with energy market re-pricing because AS are difficult to hedge.

While IGS acknowledges the Commission’s position that re-pricing real-time energy services may positively impact some and negatively impact others,² IGS supports the numerous requests made by market participants, legislators, and elected officials to correct wholesale energy

¹ The Commission acknowledged the difficulty in hedging Ancillary Services during its March 3, 2021 open meeting.

² <https://www.12newsnow.com/article/news/local/texas/dan-patrick-texas-puc-ercot-16-billion-billing-mistake/269-fb7fa72b-3f20-4dfe-b54f-2da7604c5bc0>

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prices by removing the administrative price adder as of ERCOT's cessation of load shed at 1:05 a.m. on the morning of February 18, 2021. This was simply an error on ERCOT's part that must be addressed, particularly given that there is insufficient evidence in this record to conclude that perpetuating the error is the least harmful outcome for all market participants.

IGS, however, submits these supplemental comments to emphasize that any concerns with respect to repricing the energy market—whether right or wrong— are not applicable to repricing AS. Indeed, there is no data to support the position that a significant volume of AS traded during the Winter Storm. Given that market participants did not detrimentally rely upon the AS price signal in effect during the Winter Storm to enter into hedges, it is unlikely that any market participant would be harmed by AS re-pricing. Failure to reprice AS, however, would provide a further windfall to already handsomely compensated generation resources and exacerbate the probability of default of market participants. As the list of defaults grows, the remaining market participants are forced to pick up more of the check, creating a death spiral for the competitive market.

For the reasons set forth below, IGS respectfully requests that the Commission direct the ERCOT to implement the IMM's recommendation to reprice all day-ahead AS clearing prices to cap them at the System-Wide Offer Cap ("SWCAP") of \$9,000 per MWh for operating days February 15 through February 20, 2021.

I.
RE-PRICING ANCILLARY SERVICES WILL HAVE A LIMITED IMPACT
ON MARKET PARTICIPANTS THAT ENTERED INTO
COUNTERPARTY AGREEMENTS

As the IMM concluded, the methodology used to price AS in the day-ahead market was not reflective of principles of economic market design and, therefore, led to extraordinarily high

settlement statements for IGS and others.³ The AS pricing methodology fell short of reflecting the principle that the value of reserves cannot (and should not) exceed the value of lost load, and led to *billions*⁴ in excess generation charges that unfairly enriched generators to the detriment of retail electric providers that faithfully served customers during the Winter Storm. No credible argument has been made to support the position⁵ that market participants that hedged their generation on the Intercontinental Exchange (“ICE”) may suffer substantial market losses if the IMM’s recommendation were adopted. On the contrary, the data suggests that the potential adverse impacts on generation units resulting from a repricing and resettlement event are limited.

ICE’s own data shows that a limited amount of exchange traded AS hedging activity would be impacted by correcting AS prices from February 15 to February 20, 2021⁶ as the IMM recommended. In other words, few market participants would suffer substantial financial harm from the IMM’s proposed re-pricing activity as alleged.⁷

Indeed, publicly available data from ICE appears to suggest that only 2.3% of total ancillary costs were hedged through ICE contracts during the Winter Storm.⁸ Put another way, approximately 98% of AS resources stand to enjoy a substantial windfall if the Commission does

³ Engine North America, Bulb, Young Energy, LLC and others also filed petitions to implement the IMM’s recommendation(s) regarding ancillary services pricing.

⁴ <https://www.bloomberg.com/news/articles/2021-03-03/texas-regulators-vote-to-claw-back-some-payments-from-cold-snap>

⁵ See Calpine Corporation’s Response to Independent Market Monitor’s March 1st Recommendations, Mar. 4 2021 at 2.

⁶ <https://www.theice.com/products/42944104/ERCOT-Non-Spinning-Reserve-Future/data?marketId=5937293&span=1>

⁷ See IGS Exhibit 1.

⁸ <http://mis.ercot.com/misapp/GetReports.do?reportTypeId=12316&reportTitle=DAM%20Ancillary%20Service%20Plan&showHTMLView=&mimicKey>

not re-price AS resources. It is also important to note that the remaining ancillary costs (*i.e.*, the 98%) were either transacted at the cleared market rates with ERCOT, physically scheduled by counterparties with ERCOT, or transacted via bilaterally contracts. Each of these methods can be easily trued up to any price adjustments by ERCOT and/or counterparties, and any uneconomic transactions that result from re-pricing could be compensated through uplift.

Any concerns from market participants regarding re-settlement for hedging generation activities on ICE were recently addressed by its decision to delay final settlement for AS contracts “while the prices are under review by authorities in the state of Texas.”⁹ With respect to those contracts, it is worth noting that all AS contracts are subject to ERCOT Nodal Protocols, which allow for price corrections within 30-days after the Operating Day¹⁰; therefore, market participants should be willing to accept the risk associated with re-pricing as a condition to participation.

While some generators argue that the net effect of price intervention is increased costs and reduced market transparency and efficiency¹¹, the limited amount of liquidity in the AS market during the Winter Storm underscores the need for the Commission to take deliberate action and adjust prices. Despite arguments to the contrary, doing so will provide market certainty and alleviate supplier concerns regarding future market participation. To allow harmful, erroneous pricing to stand will reduce efficiency and chill future market investment and participation. IGS believes that the more appropriate course of action is for the Commission to adhere to the IMM’s recommendations and harmonize these pricing errors with market fundamentals.

⁹https://www.theice.com/publicdocs/futures_us/exchange_notices/ICE_Futures_US_Ancillary_Contracts_Notice_2021308.pdf?utm_source2=ICE_Futures_US_Ancillary_Contracts_Notice_2021308

¹⁰ See ERCOT Nodal Protocol Section 6.3 6(a)

¹¹ *Id.* at 4.

Based on the foregoing, IGS reasserts its agreement with the IMM, that the day-ahead ancillary services clearing prices for operating days February 15 through February 20, 2021 should be repriced and capped at the system-wide offer cap (“SWCAP”) of \$9,000 per MWh to reflect an outcome consistent with principles of economic market design. The IMM’s recommendation, which would set a SWCAP of \$9,000 per MWh better reflects the principle that value of reserves cannot (and should not) exceed the value of lost load; therefore, IGS supports the IMM’s recommendation.

II. **CONCLUSION**

Given that the Commission did not enter an Order on either matter during its March 5, 2021 open meeting, IGS respectfully submits these supplemental comments to reiterate its request for the Commission exercise its authority pursuant to Tex. Util. Code Ann. § 39.151(d), and direct ERCOT to implement the IMM’s recommendations to (1) reprice and cap ancillary services in the day-ahead market at the system-wide offer cap of \$9,000 per MWh; and (2) to correct wholesale prices by removing the administrative price adder as of ERCOT’s cessation of load shed at 1:05 a.m. on the morning of February 18, 2021.

Dated: March 11, 2021.

Respectfully submitted,

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EN21382 Public-21382 4814-3619-8624v1

Futures Daily Market Report for Financial Power
02-Mar-2021

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ERK-ERCOT Regulation Up Future														
ERK	Feb21					2,957.43	0.00	0	0	0	0	0	0	0
ERK	Mar21					20.03	-3.78	0	0	0	0	0	0	0
ERK	Apr21					10.25	0.23	0	0	0	0	0	0	0
ERK	May21					10.38	0.21	0	0	0	0	0	0	0
ERK	Jun21					10.56	0.19	0	0	0	0	0	0	0
ERK	Jul21					13.58	0.22	0	0	0	0	0	0	0
ERK	Aug21					13.66	0.21	0	0	0	0	0	0	0
ERK	Sep21					10.77	0.16	0	0	0	0	0	0	0
ERK	Oct21					11.08	0.16	0	0	0	0	0	0	0
ERK	Nov21					11.29	0.16	0	0	0	0	0	0	0
ERK	Dec21					11.71	0.15	0	0	0	0	0	0	0
ERK	Jan22					12.01	0.15	0	0	0	0	0	0	0
ERK	Feb22					11.89	0.15	0	0	0	0	0	0	0
ERK	Mar22					11.65	0.16	0	0	0	0	0	0	0
ERK	Apr22					9.87	0.13	0	0	0	0	0	0	0
ERK	May22					9.32	0.10	0	0	0	0	0	0	0
ERK	Jun22					9.27	0.09	0	0	0	0	0	0	0
ERK	Jul22					11.70	0.10	0	0	0	0	0	0	0
ERK	Aug22					11.66	0.09	0	0	0	0	0	0	0
ERK	Sep22					9.14	0.06	0	0	0	0	0	0	0
ERK	Oct22					9.45	0.06	0	0	0	0	0	0	0
ERK	Nov22					9.58	0.04	0	0	0	0	0	0	0
ERK	Dec22					10.11	0.04	0	0	0	0	0	0	0
ERK	Jan23					9.55	0.04	0	0	0	0	0	0	0
ERK	Feb23					9.56	0.05	0	0	0	0	0	0	0

IGS Exhibit 1

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ERK	Mar23					9.60	0.05	0	0	0	0	0	0	0
ERK	Apr23					9.05	0.05	0	0	0	0	0	0	0
ERK	May23					8.81	0.04	0	0	0	0	0	0	0
ERK	Jun23					8.85	0.05	0	0	0	0	0	0	0
ERK	Jul23					11.31	0.06	0	0	0	0	0	0	0
ERK	Aug23					11.35	0.06	0	0	0	0	0	0	0
ERK	Sep23					8.94	0.05	0	0	0	0	0	0	0
ERK	Oct23					9.27	0.04	0	0	0	0	0	0	0
ERK	Nov23					9.49	0.06	0	0	0	0	0	0	0
ERK	Dec23					9.89	0.02	0	0	0	0	0	0	0
Totals for ERK:								0	0	0	0	0	0	0

NOTE: The information contained in this report is compiled for the convenience of subscribers and is furnished without responsibility for accuracy and is accepted by the subscriber on the condition that errors or omissions shall not be made the basis for any claim, demand or cause of action

NOTE: OI information is not available until the next business day

NOTE: Volume is aggregated and representative of each Futures market strip including applicable TAS trading activity

Open and Close prices reflect the first and last trade in the market and do not correlate to any opening or closing periods

NOTE: Spread Volume includes futures/options combinations, spreads, and defined strategies

**Futures Daily Market Report for Financial Power
02-Mar-2021**

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ERL-ERCOT Regulation Down Future														
ERL	Feb21					1,088.30	0.00	0	0	0	0	0	0	0
ERL	Mar21					15.68	0.41	0	0	0	0	0	0	0
ERL	Apr21					8.09	0.18	0	0	0	0	0	0	0
ERL	May21					8.19	0.16	0	0	0	0	0	0	0
ERL	Jun21					8.33	0.14	0	0	0	0	0	0	0
ERL	Jul21					10.72	0.18	0	0	0	0	0	0	0
ERL	Aug21					10.79	0.17	0	0	0	0	0	0	0
ERL	Sep21					8.50	0.12	0	0	0	0	0	0	0
ERL	Oct21					8.74	0.12	0	0	0	0	0	0	0
ERL	Nov21					8.91	0.12	0	0	0	0	0	0	0
ERL	Dec21					9.24	0.12	0	0	0	0	0	0	0
ERL	Jan22					8.81	0.11	0	0	0	0	0	0	0
ERL	Feb22					11.15	0.14	0	0	0	0	0	0	0
ERL	Mar22					10.00	0.14	0	0	0	0	0	0	0
ERL	Apr22					7.70	0.11	0	0	0	0	0	0	0
ERL	May22					7.31	0.08	0	0	0	0	0	0	0
ERL	Jun22					7.30	0.06	0	0	0	0	0	0	0
ERL	Jul22					9.26	0.07	0	0	0	0	0	0	0
ERL	Aug22					9.24	0.07	0	0	0	0	0	0	0
ERL	Sep22					7.26	0.05	0	0	0	0	0	0	0
ERL	Oct22					7.48	0.04	0	0	0	0	0	0	0
ERL	Nov22					7.61	0.03	0	0	0	0	0	0	0
ERL	Dec22					8.05	0.03	0	0	0	0	0	0	0
ERL	Jan23					7.22	0.04	0	0	0	0	0	0	0
ERL	Feb23					8.28	0.04	0	0	0	0	0	0	0

IGS Exhibit 1

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		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ERL	Mar23					7.89	0.05	0	0	0	0	0	0	0
ERL	Apr23					7.05	0.03	0	0	0	0	0	0	0
ERL	May23					6.90	0.04	0	0	0	0	0	0	0
ERL	Jun23					6.96	0.04	0	0	0	0	0	0	0
ERL	Jul23					8.90	0.05	0	0	0	0	0	0	0
ERL	Aug23					8.95	0.04	0	0	0	0	0	0	0
ERL	Sep23					7.06	0.04	0	0	0	0	0	0	0
ERL	Oct23					7.32	0.04	0	0	0	0	0	0	0
ERL	Nov23					7.50	0.05	0	0	0	0	0	0	0
ERL	Dec23					7.80	0.02	0	0	0	0	0	0	0
Totals for ERL:								0	0	0	0	0	0	0

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**Futures Daily Market Report for Financial Power
02-Mar-2021**

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ENS-ERCOT Non-Spinning Reserve Future														
ENS	Feb21					1,600.08	0.00	0	75	0	0	0	0	0
ENS	Mar21					3.25	-0.28	0	75	0	0	0	0	0
ENS	Apr21					4.34	0.09	0	75	0	0	0	0	0
ENS	May21					4.43	0.09	0	75	0	0	0	0	0
ENS	Jun21					4.47	0.08	0	75	0	0	0	0	0
ENS	Jul21					42.45	0.68	0	75	0	0	0	0	0
ENS	Aug21					42.75	0.65	0	75	0	0	0	0	0
ENS	Sep21					4.57	0.07	0	75	0	0	0	0	0
ENS	Oct21					4.94	0.07	0	75	0	0	0	0	0
ENS	Nov21					5.03	0.07	0	75	0	0	0	0	0
ENS	Dec21					5.19	0.07	0	75	0	0	0	0	0
ENS	Jan22					3.15	0.04	0	0	0	0	0	0	0
ENS	Feb22					3.06	0.04	0	0	0	0	0	0	0
ENS	Mar22					2.78	0.04	0	0	0	0	0	0	0
ENS	Apr22					2.14	0.03	0	0	0	0	0	0	0
ENS	May22					2.01	0.02	0	0	0	0	0	0	0
ENS	Jun22					2.01	0.02	0	0	0	0	0	0	0
ENS	Jul22					52.05	0.41	0	0	0	0	0	0	0
ENS	Aug22					51.94	0.39	0	0	0	0	0	0	0
ENS	Sep22					1.98	0.02	0	0	0	0	0	0	0
ENS	Oct22					2.29	0.01	0	0	0	0	0	0	0
ENS	Nov22					2.33	0.02	0	0	0	0	0	0	0
ENS	Dec22					2.45	0.01	0	0	0	0	0	0	0
ENS	Jan23					3.32	0.02	0	0	0	0	0	0	0
ENS	Feb23					3.29	0.02	0	0	0	0	0	0	0

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COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ECR-ERCOT Capacity Responsive Reserve Future														
ECR	Feb21					3,809.26	0.00	0	50	0	0	0	0	0
ECR	Mar21					37.76	-11.34	0	50	0	0	0	0	0
ECR	Apr21					17.64	0.38	0	50	0	0	0	0	0
ECR	May21					16.01	0.31	0	50	0	0	0	0	0
ECR	Jun21					14.04	0.25	0	30	0	0	0	0	0
ECR	Jul21					37.75	0.61	0	30	0	0	0	0	0
ECR	Aug21					47.28	0.73	0	30	0	0	0	0	0
ECR	Sep21					14.56	0.22	0	30	0	0	0	0	0
ECR	Oct21					14.61	0.20	0	30	0	0	0	0	0
ECR	Nov21					14.89	0.21	0	30	0	0	0	0	0
ECR	Dec21					15.51	0.21	0	30	0	0	0	0	0
ECR	Jan22					13.18	0.16	0	80	0	0	0	0	0
ECR	Feb22					12.91	0.16	0	80	0	0	0	0	0
ECR	Mar22					12.04	0.17	0	80	0	0	0	0	0
ECR	Apr22					10.28	0.13	0	80	0	0	0	0	0
ECR	May22					10.09	0.11	0	80	0	0	0	0	0
ECR	Jun22					10.23	0.09	0	80	0	0	0	0	0
ECR	Jul22					27.40	0.22	0	80	0	0	0	0	0
ECR	Aug22					33.56	0.25	0	80	0	0	0	0	0
ECR	Sep22					9.87	0.07	0	80	0	0	0	0	0
ECR	Oct22					9.95	0.06	0	80	0	0	0	0	0
ECR	Nov22					10.17	0.05	0	80	0	0	0	0	0
ECR	Dec22					10.76	0.04	0	80	0	0	0	0	0
ECR	Jan23					12.21	0.06	0	80	0	0	0	0	0
ECR	Feb23					11.89	0.07	0	80	0	0	0	0	0

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ECR	Mar23					11.01	0.05	0	80	0	0	0	0	0
ECR	Apr23					9.69	0.05	0	80	0	0	0	0	0
ECR	May23					9.42	0.05	0	80	0	0	0	0	0
ECR	Jun23					9.54	0.05	0	80	0	0	0	0	0
ECR	Jul23					26.20	0.14	0	80	0	0	0	0	0
ECR	Aug23					32.89	0.17	0	80	0	0	0	0	0
ECR	Sep23					8.87	0.05	0	80	0	0	0	0	0
ECR	Oct23					8.91	0.05	0	80	0	0	0	0	0
ECR	Nov23					9.23	0.05	0	80	0	0	0	0	0
ECR	Dec23					9.89	0.02	0	80	0	0	0	0	0
ECR	Jan24					11.11	0.04	0	80	0	0	0	0	0
ECR	Feb24					10.91	0.04	0	80	0	0	0	0	0
ECR	Mar24					10.26	0.04	0	80	0	0	0	0	0
ECR	Apr24					8.97	0.03	0	80	0	0	0	0	0
ECR	May24					8.86	0.03	0	80	0	0	0	0	0
ECR	Jun24					9.00	0.04	0	80	0	0	0	0	0
ECR	Jul24					24.22	0.09	0	80	0	0	0	0	0
ECR	Aug24					29.67	0.11	0	80	0	0	0	0	0
ECR	Sep24					8.75	0.03	0	80	0	0	0	0	0
ECR	Oct24					8.85	0.03	0	80	0	0	0	0	0
ECR	Nov24					9.14	0.03	0	80	0	0	0	0	0
ECR	Dec24					9.77	0.03	0	80	0	0	0	0	0
ECR	Jan25					10.60	0.03	0	80	0	0	0	0	0
ECR	Feb25					10.35	0.03	0	80	0	0	0	0	0
ECR	Mar25					9.75	0.04	0	80	0	0	0	0	0
ECR	Apr25					8.39	0.03	0	80	0	0	0	0	0
ECR	May25					8.19	0.03	0	80	0	0	0	0	0
ECR	Jun25					8.31	0.03	0	80	0	0	0	0	0

IGS Exhibit 1

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ECR	Jul25					22.53	0.08	0	80	0	0	0	0	0
ECR	Aug25					27.82	0.10	0	80	0	0	0	0	0
ECR	Sep25					7.95	0.03	0	80	0	0	0	0	0
ECR	Oct25					7.99	0.03	0	80	0	0	0	0	0
ECR	Nov25					8.29	0.03	0	80	0	0	0	0	0
ECR	Dec25					8.88	0.02	0	80	0	0	0	0	0
ECR	Jan26					9.94	0.03	0	60	0	0	0	0	0
ECR	Feb26					9.70	0.03	0	60	0	0	0	0	0
ECR	Mar26					9.07	0.03	0	60	0	0	0	0	0
ECR	Apr26					7.84	0.03	0	60	0	0	0	0	0
ECR	May26					7.62	0.02	0	60	0	0	0	0	0
ECR	Jun26					7.74	0.03	0	60	0	0	0	0	0
ECR	Jul26					21.04	0.08	0	60	0	0	0	0	0
ECR	Aug26					26.03	0.09	0	60	0	0	0	0	0
ECR	Sep26					7.37	0.02	0	60	0	0	0	0	0
ECR	Oct26					7.44	0.02	0	60	0	0	0	0	0
ECR	Nov26					7.72	0.03	0	60	0	0	0	0	0
ECR	Dec26					8.28	0.02	0	60	0	0	0	0	0
ECR	Jan27					9.24	0.03	0	55	0	0	0	0	0
ECR	Feb27					9.05	0.03	0	55	0	0	0	0	0
ECR	Mar27					8.46	0.03	0	55	0	0	0	0	0
ECR	Apr27					7.29	0.02	0	55	0	0	0	0	0
ECR	May27					7.12	0.03	0	55	0	0	0	0	0
ECR	Jun27					7.20	0.03	0	55	0	0	0	0	0
ECR	Jul27					19.50	0.08	0	55	0	0	0	0	0
ECR	Aug27					24.03	0.09	0	55	0	0	0	0	0
ECR	Sep27					6.94	0.03	0	55	0	0	0	0	0
ECR	Oct27					6.99	0.03	0	55	0	0	0	0	0

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ECR	Nov27					7.23	0.02	0	55	0	0	0	0	0
ECR	Dec27					7.82	0.03	0	55	0	0	0	0	0
Totals for ECR:								0	5,630	0	0	0	0	0

NOTE The information contained in this report is compiled for the convenience of subscribers and is furnished without responsibility for accuracy and is accepted by the subscriber on the condition that errors or omissions shall not be made the basis for any claim, demand or cause of action

NOTE OI information is not available until the next business day

NOTE Volume is aggregated and representative of each Futures market strip including applicable TAS trading activity

Open and Close prices reflect the first and last trade in the market and do not correlate to any opening or closing periods

NOTE Spread Volume includes futures/options combinations, spreads, and defined strategies

COMMODITY NAME	CONTRACT MONTH	DAILY PRICE RANGE				SETTLE		VOLUME AND OI TOTALS						
		OPEN#	HIGH	LOW	CLOSE#	PRICE	CHANGE	TOTAL VOLUME	OI	CHANGE	EFP	EFS	BLOCK VOLUME	SPREAD VOLUME
ENS	Mar23					3.21	0.02	0	0	0	0	0	0	0
ENS	Apr23					2.97	0.02	0	0	0	0	0	0	0
ENS	May23					2.94	0.02	0	0	0	0	0	0	0
ENS	Jun23					2.96	0.02	0	0	0	0	0	0	0
ENS	Jul23					43.60	0.24	0	0	0	0	0	0	0
ENS	Aug23					43.83	0.22	0	0	0	0	0	0	0
ENS	Sep23					3.01	0.01	0	0	0	0	0	0	0
ENS	Oct23					3.34	0.01	0	0	0	0	0	0	0
ENS	Nov23					3.44	0.02	0	0	0	0	0	0	0
ENS	Dec23					3.54	0.00	0	0	0	0	0	0	0
Totals for ENS:								0	825	0	0	0	0	0

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