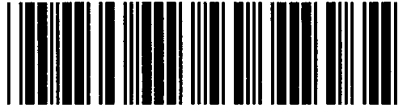




Control Number: 51812



Item Number: 75

Addendum StartPage: 0

PROJECT NO. 51812

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

2021 MAR -5 AM 9:26
**BEFORE THE PUBLIC UTILITY COMMISSION
OF TEXAS**

PETITION TO IMPLEMENT IMM RECOMENDATIONS

MidAmerican Energy Services, LLC (“MidAmerican”) respectfully requests that the Public Utility Commission of Texas (“Commission”) direct the Electric Reliability Council of Texas (“ERCOT”) to implement the recommendation of the Independent Market Monitor (“IMM”) concerning the repricing of ancillary services. MidAmerican is a Retail Electric Provider in Texas, and as such, participates in the ERCOT market. The extraordinary ancillary settlement costs that occurred during the February 2021 winter weather event will have a serve impact on retail electric providers, municipalities, cooperative utilities and customers. ERCOT’s market outcomes during the winter weather event have produced unreasonable costs and, at a minimum, the Commission should order ERCOT to implement the IMM recommendations.

Request

The Commission should be commended for actions taken on March 3, 2021 to claw back payments for ancillary services that were not provided during the winter weather event. In addition, the IMM recommendation to re-price all day-ahead ancillary services 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 should be implemented. As the IMM pointed out, the value of reserves cannot exceed the value of lost load which is equal to the SWCAP of \$9,000.

Conclusion

PURA §39.151(d) gives the Commission complete authority over ERCOT. MidAmerican respectfully requests that the Commission order ERCOT to implement the IMM recommendation to reprice all day-ahead ancillary services 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. Without such action, municipal and cooperative utilities, retail energy providers, and retail customers will be irreparably harmed by these artificially high prices.

Respectfully Submitted,



Edward J. McGreen
President
MidAmerican Energy Services, LLC
4299 NW Urbandale Drive
Urbandale, Iowa 50322
(515) 281-2533
Edward.McGreen@midamericanenergyservices.com