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PUC DOCKET NO. 52321

**APPLICATION OF THE ELECTRIC
RELIABILITY COUNCIL OF TEXAS,
INC. FOR A DEBT OBLIGATION
ORDER UNDER PURA CHAPTER 39,
SUBCHAPTER M, AND REQUEST FOR
A GOOD CAUSE EXCEPTION**

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**BEFORE THE
PUBLIC UTILITY
COMMISSION OF TEXAS**

**RWE RENEWABLES AMERICAS, LLC'S
FIRST REQUEST FOR INFORMATION TO ERCOT**

RWE Renewables Americas, LLC (RWE) files this First Request for Information to the Electric Reliability Council of Texas (ERCOT) in the above-styled docket. ERCOT is hereby requested to furnish one copy of all items of information enumerated on the attached sheets directly to the undersigned attorney at the offices of Stephanie C. Sparks, Vedder Price P.C., 100 Crescent Court, Suite 350, Dallas, Texas 75201, within seven (7) calendar days. These requests shall be deemed continuing so as to require further and supplemental responses if ERCOT receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

DEFINITIONS AND INSTRUCTIONS

A. “Electric Reliability Council of Texas” or “ERCOT” refers to its parents, affiliates and subsidiaries, and any person acting or purporting to act on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

B. The term “document” shall have the broadest meaning possible under the Texas Rules of Civil Procedure and shall include, but not be limited to, the original (or a copy when the original is not available), each non-identical copy (including those which are non-identical by reason of notations or marking, or by appearing in the files of a separate person), and any books, notebooks, pamphlets, periodicals, letters, reports, memoranda, handwritten notes, notations,

messages, telegrams, wires, cables, press or news wire releases, records, studies, analyses, summaries, magazines, booklets, circulars, catalogs, bulletins, instructions, operating or maintenance manuals, operating or product specifications, fabrication sheets, test data, design specifications, parts lists, calendars, day-timers, notes or records of meetings, notices, purchase orders, bills, ledgers, checks, tabulations, questionnaires, surveys, drawings, sketches, schematics, blueprints, flow sheets, working papers, charts, graphs, indices, tapes, agreements, releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements, photographs, films or videotapes, back-up tapes, minutes, contracts, leases, invoices, records of purchase or sale, correspondence, electronic or other transcription or tapings of or notes pertaining to telephone or personal conversations or conferences, tape recordings, electromagnetic recordings, voice mail message or transcriptions thereof, interoffice communications of all types, e-mail messages, printouts of e-mail messages, instant messages or printouts thereof, microfilms, electronic databases, CDs, DVDs, videotapes or cassettes, films, movies, computer printouts and any and all other written, printed, typed, punched, engraved, taped, filmed, recorded (electronically or otherwise), labeled, or graphic matter, of whatever description, however produced or reproduced (including computer-stored or generated data, together with instructions or programs necessary to search and retrieve such data), and shall include all attachments to (including tangible things) and enclosures with (including tangible things) any requested item, to which they are attached or with which they are enclosed, and each draft thereof. A draft of a non-identical copy is a separate document within the meaning of this term. An electronic copy of a paper documents is a separate document within the meaning of this term.

C. The terms “and” and “or” shall be construed both disjunctively and conjunctively as necessary to make the request inclusive rather than exclusive.

D. “Each” shall be construed to include the word “every” and “every” shall be construed to include the word “each.”

E. “Any” shall be construed to include “all” and “all” shall be construed to include “any.”

F. The term “concerning,” or one of its inflections, includes the following meanings: relating to; referring to; pertaining to; regarding; discussing; mentioning; containing; reflecting; evidencing; describing; showing; identifying; providing; disproving; consisting of; supporting; contradicting; in any way legally, logically or factually connected with the matter to which the term refers; or having a tendency to prove or disprove the matter to which the term refers.

G. The term “including,” or one of its inflections, means and refers to “including but not limited to.”

H. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.

I. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

J. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.

K. Pursuant to 16 Tex. Admin. Code§ 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.

L. If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format,

please furnish specific references thereto, including Bates Stamp page citations and detailed cross references.

Dated: August 16, 2021

Respectfully submitted,

VEDDER PRICE P.C.

By: s/ Stephanie C. Sparks

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 16, 2021, in accordance with the Order Suspending Rules, issued in Project No. 52321.

s/ Stephanie C. Sparks

Stephanie C. Sparks

PUC DOCKET NO. 52321

RWE'S FIRST RFI TO ERCOT

- RWE 1-1 Please identify which ERCOT Protocols will need to be revised if ERCOT's application in Docket No. 52321 is approved.
- RWE 1-2 Please identify which ERCOT Protocols (1) govern ERCOT's usage of Congestion Revenue Rights (CRR) auction funds to reduce amounts short-paid to wholesale market participants on February 26, 2021; (2) govern ERCOT's replenishment of such auction revenue funds; and (3) ERCOT deviated from in using such CRR auction funds to reduce amounts short-paid to wholesale market participants on February 26, 2021.