



## Filing Receipt

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**PUC DOCKET NO. 52321**

<b>APPLICATION OF THE ELECTRIC</b>	<b>§</b>	<b>BEFORE THE</b>
<b>RELIABILITY COUNCIL OF TEXAS,</b>	<b>§</b>	
<b>INC. FOR A DEBT OBLIGATION</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>ORDER UNDER PURA CHAPTER 39,</b>	<b>§</b>	
<b>SUBCHAPTER M, AND REQUEST</b>	<b>§</b>	
<b>FOR A GOOD CAUSE EXCEPTION</b>	<b>§</b>	<b>OF TEXAS</b>

**ELECTRIC RELIABILITY COUNCIL OF TEXAS’  
RESPONSE TO RWE RENEWABLES AMERICAS, LLC’S  
FIRST REQUEST FOR INFORMATION**

Electric Reliability Council of Texas (“ERCOT”) files this response to RWE Renewables Americas, LLC’s (“RWE”) First Request for Information.

**I. WRITTEN RESPONSES**

ERCOT’s written responses to RWE’s First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. ERCOT’s responses are made in the spirit of cooperation without waiving ERCOT’s right to contest the admissibility of any of these matters at hearing. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When ERCOT provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes pursuant to P.U.C. PROC. R. 22.144(d)(5). Pursuant to P.U.C. PROC. R. 22.144(c)(2)(F), ERCOT stipulates that its responses may be treated by all parties as if they were made under oath.

**WINSTEAD PC**

By: /s/ Ron H. Moss

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**ATTORNEYS FOR ERCOT**

**CERTIFICATE OF SERVICE**

This document was filed on the Commission's Interchange website on August 24, 2021. In accordance with Order No. 2 in this docket, filing a document on the Commission's Interchange website constitutes service of the document on all parties to this proceeding.

/s/ Ron H. Moss  
Ron H. Moss

## RESPONSES

### QUESTION NO. RWE 1-1:

Please identify which ERCOT Protocols will need to be revised if ERCOT's application in Docket No. 52321 is approved.

### RESPONSE:

ERCOT will need to develop new Protocols to implement the Commission's decision in Docket No. 52321. Whether ERCOT has to revise any existing Protocols depends on the Commission's decisions in Docket No. 52321.

Preparer: Kenan Ögelman

Sponsor: Kenan Ögelman

**QUESTION NO. 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.

**RESPONSE:**

1. No Protocol governs ERCOT's usage of Congestion Revenue Rights ("CRR") auction funds to reduce amounts short paid to wholesale market participants on February 26, 2021. ERCOT took that action pursuant to the Commission's order on February 21, 2021. *See* Project No. 51812, Issues Related to the State of Disaster for the February 2021 Winter Weather Event, Order Directing ERCOT to Take Action and Granting Exception to ERCOT Protocols.
2. No Protocol governs ERCOT's replenishment of CRR auction funds. ERCOT seeks Commission approval in this docket to replenish CRR auction funds.
3. As explained in the response to subpart (1), no Protocol addresses the issue of whether ERCOT should use CRR auction funds to reduce the amounts short paid to wholesale market participants. ERCOT deviated from ERCOT Protocol Section 7.6 to the extent that Protocol requires ERCOT to use CRR auction funds for purposes other than paying short-paid wholesale market participants. But as noted in the response to subpart (1), ERCOT took that action pursuant to Commission order.

Preparer: Kenan Ögelman  
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