



## Filing Receipt

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**PUC DOCKET NO. 52321**

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

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S  
RESPONSE TO LOWER COLORADO RIVER AUTHORITY  
AND LCRA WSC ENERGY’S  
FIRST REQUEST FOR INFORMATION**

Electric Reliability Council of Texas, Inc. (“ERCOT”) files this response to Lower Colorado River Authority and LCRA WSC Energy’s (collectively “LCRA”) First Request for Information.

**I. WRITTEN RESPONSES**

ERCOT’s written responses to LCRA’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 10, 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

## RESPONSE

### QUESTION NO. LCRA 1-1:

Refer to page 37, lines 19-20 of ERCOT's Application for a Debt Obligation Order to Finance Default Balances Under PURA Chapter 39, Subchapter M, and Request for Good Cause Exception, which states, "the cumulative aggregate short pay amount attributable to terminated competitive wholesale market participants was approximately \$418 million." Admit or deny that the cumulative aggregate short pay amount excludes administration fees and charges.

### RESPONSE:

Deny. The cumulative aggregate short pay amount includes administration fees and charges.

Preparers: Austin Rosel, Mark Ruane  
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