



Filing Receipt

Received - 2021-08-11 02:59:52 PM

Control Number - 52321

ItemNumber - 89

PUC DOCKET NO. 52321

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

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.’S
RESPONSE TO LOWER COLORADO RIVER AUTHORITY
AND LCRA WSC ENERGY’S
SECOND 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”) Second Request for Information.

I. WRITTEN RESPONSES

ERCOT’s written responses to LCRA’s Second 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

Elliot Clark
State Bar No. 24012428
eclark@winstead.com
Ron H. Moss
State Bar No. 14591025
rhmosse@winstead.com
Jeff Nydegger
State Bar No. 24077002
jnydegger@winstead.com
401 Congress Avenue, Suite 2100
Austin, Texas 78701
Telephone: (512) 370-2800
Facsimile: (512) 370-2850

James Doyle
State Bar No. 06094600
jdoyle@winstead.com
Winstead PC
600 Travis Street, Suite 5200
Houston, Texas 77002
Telephone: (713) 650-8400
Facsimile: (713) 650-2400

ATTORNEYS FOR ERCOT

CERTIFICATE OF SERVICE

This document was filed on the Commission's Interchange website on August 11, 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. LCRA 2-1:

Refer to ERCOT's response to AE 1-1, which states that a QSE or CRR account holder that was short-paid at any time for activity that occurred during the period of emergency "will receive a pro-rata share of the funds, unless the Commission directs otherwise," and that "the remainder that is allocated to short-paid market participants would be allocated to their earliest short-paid invoices."

Provide a detailed description of the methodology for calculating short-paid market participants' pro-rata share.

RESPONSE:

ERCOT will use the portion of the default balance proceeds that is intended to cover the amounts still owed to ERCOT by competitive wholesale market participants for the period of emergency as follows: This portion of the default balance proceeds—less the portion that will be used to replenish, in part, the CRR auction revenue funds used to reduce short-payments by ERCOT on invoice due date February 25, 2021—will be used to make payments to those market participants that are still owed payments from ERCOT for invoices that contain period of emergency operating dates. The payments will be allocated to each eligible market participant on applicable invoice dates on a pro rata basis. A market participant's pro rata share will be calculated by dividing the short-paid amount still owed to the market participant for the invoice by the total short paid amount owed to all market participants for the invoice date.

Preparers: Mark Ruane, Read Comstock
Sponsor: Kenan Ögelman

QUESTION NO. LCRA 2-2:

Provide the short-pay amounts by counterparty for only the period of emergency, in the same format as Market Notice M-BO80221-01 dated August 2, 2021.

RESPONSE:

Counter-Party	\$ Total
BRAZOS ELECTRIC POWER CO OP INC (CP)	\$1,878,564,606.72
EAGLES VIEW PARTNERS LTD (CP)	\$1,152,199.09
ENERGY MONGER LLC (CP)	\$8,835,073.62
ENTRUST ENERGY INC (CP)	\$295,766,560.47
GBPOWER LLC (CP)	\$20,294,417.65
GRIDDY ENERGY LLC (CP)	\$29,971,453.13
GRIDPLUS TEXAS INC (CP)	\$1,485,561.31
HANWHA ENERGY USA HOLDINGS CORP DBA 174 POWER GLOBAL (CP)	\$33,169,659.23
ILUMINAR ENERGY LLC (CP)	\$41,829,926.82
MQE LLC (CP)	\$13,663,791.70
POWER OF TEXAS HOLDINGS INC VIRTUAL (CP)	\$0.00
RAYBURN COUNTRY ELECTRIC COOPERATIVE INC (CP)	\$639,165,567.07
VOLT ELECTRICITY PROVIDER LP (CP)	\$6,036,192.88
Total	\$2,969,935,009.69

Preparer: Austin Rosel
Sponsor: Kenan Ögelman

QUESTION NO. LCRA 2-3:

For each invoice date beginning 2/22/2021 through 7/30/2021, provide the short paid amounts attributable to only the period of emergency, in the same format as Market Notice MBO80221-01 dated August 2, 2021.

RESPONSE:

Invoice Due Date	\$ Total
2/22/2021	\$11,013,705.37
2/23/2021	\$16,600,967.04
2/25/2021	\$1,865,130,880.74
2/26/2021	\$297,521,021.89
3/01/2021	\$662,307.76
3/04/2021	\$13,389.46
3/05/2021	\$23,330,933.06
3/08/2021	\$349,868,396.77
3/09/2021	\$241,646,052.38
3/10/2021	\$52,135,759.48
3/16/2021	\$5,378,656.88
4/12/2021	\$5,724.47
4/13/2021	\$30,305.03
4/14/2021	\$37,169,988.20
4/15/2021	\$23,647,574.02
4/16/2021	\$25,451,092.16
4/19/2021	\$11,283,512.80
4/20/2021	\$1,170,302.73
4/22/2021	\$933,547.08
7/29/2021	\$6,940,892.37
Total	\$2,969,935,009.69

Preparer: Austin Rosel
Sponsor: Kenan Ögelman

QUESTION NO. LCRA 2-4:

For each of the following terminated market participants, provide the total short-paid amount by market participant that is attributable to the period of emergency:

EAGLES VIEW PARTNERS LTD (CP)
ENERGY MONGER LLC (CP)
ENTRUST ENERGY INC (CP)
GBPOWER LLC (CP)
GRIDDY ENERGY LLC (CP)
GRIDPLUS TEXAS INC (CP)
ILUMINAR ENERGY LLC (CP)
MQE LLC (CP)
POWER OF TEXAS HOLDINGS INC VIRTUAL (CP)
VOLT ELECTRICITY PROVIDER LP (CP)

RESPONSE:

Please see ERCOT's response to Question No. LCRA 2-2.

Preparer: Austin Rosel
Sponsor: Kenan Ögelman

QUESTION NO. LCRA 2-5:

For each invoice date beginning 2/22/2021 through 7/30/2021, provide the short paid amounts attributable to only the period of emergency for the terminated market participants listed in LCRA 2-4 above, in the same format as Market Notice M-BO80221-01 dated August 2, 2021.

RESPONSE:

Invoice Due Date	\$ Total
2/22/2021	\$11,013,705.37
2/23/2021	\$16,600,967.04
2/25/2021	\$271,083,881.03
2/26/2021	\$36,099,686.97
3/01/2021	\$662,307.76
3/04/2021	\$13,389.46
3/05/2021	\$1,110,603.44
3/08/2021	\$24,509,831.75
3/09/2021	\$36,111,084.68
3/10/2021	\$7,239,330.58
4/14/2021	\$3,614,241.18
4/15/2021	\$3,779,337.78
4/16/2021	\$4,295,182.38
4/19/2021	\$1,317,709.38
4/20/2021	\$874,584.29
4/22/2021	\$108,862.62
7/29/2021	\$600,470.96
Total	\$419,035,176.67

Preparer: Austin Rosel
Sponsor: Kenan Ögelman