



## Filing Receipt

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**Re:** Comments on Project No. 52373 – Review of Wholesale Electric Market Design

**From:** SB Energy

**Date:** November 1, 2021

SB Energy thanks the Commission for giving us the opportunity to submit comments to the Wholesale Electric market design changes. SB Energy is developer and long-term owner and operator of reliable, affordable 24/7 clean energy.

During the winter event that led to high scarcity of resources in ERCOT, the solar resources played a crucial role in reducing the intensity of the weather event by providing needed, stable energy resources. Our 418MW solar facility in Borden County reliably produced forecasted levels of electricity even in the face of the extreme weather. The Commission should take into the account while looking at market design changes, as these changes should not to penalize or burden solar generating resources given they serve as a key resource to stabilize the grid during extreme weather events. Rather, the Commission may want to incentivize solar generating resources to ensure it stays on during the time of scarcity and help ensure reliability to Texas homes and businesses.

ERCOT made changes to the ORDC curve to blended curve to increase development of demand response, distributed generation, and increased investment in generation maintenance. Although ERCOT achieved some of this, we believe that the methodology for the calculation of ORDC should be revisited to send price signals to the market to address the need for resources during resource scarcity. Utilizing the existing ancillary services to send price signals would highly encourage not only flexible generation, but also flexible load.

ERCOT should investigate fast deployable, flexible resources like energy storage that take less time to develop. We encourage the Commission to modify the ancillary market to send price signals to storage projects so they can be developed quickly as they are crucial regardless of mix of generating resources.

In PJM and in other ISOs, generation, including solar generation, is compensated for providing reactive power support. The Commission should investigate a better mechanism where non-dispatchable resources will be compensated for providing grid support.

#### **ABOUT SB ENERGY**

SB Energy, a wholly owned subsidiary of SoftBank Group Corp., is a leading utility-scale solar, energy storage, and technology platform. We develop, construct, and own and operate some of the largest and most technically advanced renewable projects across the United States. SB Energy's mission is to provide flexible renewable energy at scale, accelerating the global energy transition, and benefiting our planet, customers, communities, and people.

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