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**COMMENTS FOR
TEXAS PUBLIC UTILITY COMMISSION PROJECT #52373
AUGUST 11, 2021**

My name is Richard Howe. I am a native Texan, and a long-time resident of Plano, Texas. I am providing these comments for consideration for Project 52373, "Review of Wholesale Electric Market Design"

Thank you for the opportunity to submit these written comments. As an advocate for competitive free-markets, I think there have been many benefits to Texans from our electricity market design. However, it is evident from the February 2021 event and prior extreme weather events (e.g. 2011), market design improvements at the boundary conditions are required.

My comments address two broad categories that somewhat map across all six of the questions in the filing requesting responses by August 16, 2021. As I am not a regulatory expert or attorney, I respectfully ask that commission staff and/or the Office of the Public Utility Counsel staff consider my broad comments and how they best map into each of the specific questions.

The two broad categories are (1) Distributed Energy Resources, and (2) Greenhouse Gas Emissions Reductions

1. Distributed Energy Resources

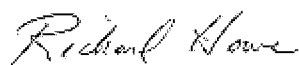
New distributed technologies are now available, such as local behind-the-meter solar and storage. We need to establish improved market rules to leverage the grid benefits of these resources and further incentivize private investments. This would enable greater local energy independence and resilience and expand market opportunities for distributed microgrids. Please consider information in these sources:

- The roadmap to the lowest cost grid is paved with distributed solar and storage; (<https://pv-magazine-usa.com/2020/12/03/the-roadmap-to-the-lowest-cost-grid-is-paved-with-distributed-solar-and-storage/>)
- 5 Ways Distributed Energy Resources are Working in Texas, Now; (<https://blog.aee.net/5-ways-distributed-energy-resources-are-working-in-texas-now>)

2. Greenhouse Gas Emission Reductions

As we look again to lead the way in market-based electric grid designs for the 21st century, we must not overlook 21st century challenges. Therefore, along with other criteria, we must equally consider and implement market design rules now that will further incentivize the reduction of greenhouse gas emissions so that we can achieve net zero emissions in the coming decades.

With Appreciation,



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