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**SOAH DOCKET NO. 473-23-04518
PUC DOCKET NO. 53377**

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| COMPLAINT OF ENGIE ENERGY MARKETING NA, INC. AND VIRIDITY ENERGY SOLUTIONS, INC. AGAINST THE ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC. | § § § § § § | BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS |
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**VIRIDITY ENERGY SOLUTIONS, INC.’S RESPONSE TO ERCOT’S SIXTH SET OF
REQUESTS FOR INFORMATION**

Viridity Energy Solutions, Inc. (“Viridity”) files this Response to Electric Reliability Council of Texas, Inc.’s (“ERCOT”) Sixth Set of Requests for Information and would respectfully show as follows:

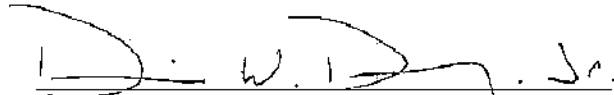
I. INTRODUCTION

On March 18, 2022, ENGIE Energy Marketing NA, Inc. (“ENGIE”) and Viridity filed their Complaint Against ERCOT. On September 21, 2023, ERCOT issued its Sixth Request for Information to Viridity. Therefore, Viridity’s responses are timely filed.

II. WRITTEN RESPONSES

Attached hereto and incorporated herein by reference are Viridity’s written responses to the aforementioned requests for information. Each such response is set forth separately beneath a restatement of the relevant request. Such responses are made without waiver of Viridity’s right to contest the admissibility of any such matters upon hearing. Viridity hereby stipulates that its responses may be treated by all parties exactly as if they were filed under oath.

Respectfully submitted,



Dennis W. Donley, Jr.

State Bar No. 24004620

Stephen Mack

State Bar No. 24041374

donley@namanhowell.com

smack@namanhowell.com

NAMAN, HOWELL, SMITH & LEE, PLLC

8310 N. Capital of Texas Hwy., Suite 490

Austin, Texas 78731

(512) 479-0300

(512) 474-1901 (Facsimile)

COFFIN RENNER LLP

Ann M. Coffin

State Bar No. 00787941

1011 W. 31st Street

Austin, Texas 78705

Office: (512) 879-0900

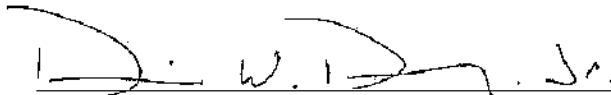
Facsimile: (512) 879-0912

ann.coffin@crtxlaw.com

*Attorneys for ENGIE Energy Marketing NA, Inc.
and Viridity Energy Solutions, Inc.*

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on October 5, 2023, in accordance with 16 TAC § 22.74.



Dennis W. Donley, Jr.

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VIRIDITY'S RESPONSES TO ERCOT'S SIXTH
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ERCOT 6-1 Please refer to the rebuttal testimony of Michael Pavo at page 44, lines 11-12. Please explain the current status and outcome, if any, of the Viridity Imbalance Charge Dispute.

RESPONSE:

See Viridity's Response to ERCOT's RFI 6-2.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-2 Please refer to the rebuttal testimony of Michael Pavo at page 44, lines 11-12.

- a. Please admit that Viridity voluntarily withdrew the Viridity Imbalance Charge Dispute.
- b. If your answer is anything other than "admit," please explain in detail the basis for your answer and provide any documents that support your answer

RESPONSE:

Admit, if the reference in the question to the "Viridity Imbalance Charge Dispute" refers to the ADR for imbalance charges attributable to February 15, 2021.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-3 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that at the time of the RRS deployment on Operating Day February 15, 2021, Viridity had an Ancillary Service Supply Responsibility that included at least 117 MW of RRS from Non-Controllable Load Resources.
- b. If the answer to subpart (a) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Ancillary Service Supply Responsibility that you contend Viridity had at the time of RRS deployment on Operating Day February 15, 2021.
- c. Please admit that for the last 15-minute Settlement Interval for Operating Day February 15, 2021, Viridity had an Ancillary Service Supply Responsibility that included at least 117 MW of RRS from Non-Controllable Load Resources.
- d. If the answer to subpart (c) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Ancillary Service Supply Responsibility that you contend Viridity had during the last fifteen-minute Settlement Interval for Operating Day February 15, 2021.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-4 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that Viridity did not have a Real-Time Ancillary Service Supply Responsibility for RRS for any 15-minute Settlement Interval on February 16, 2021.
- b. If your answer to subpart (a) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time Ancillary Service Supply Responsibility for any 15-minute Settlement Interval on Operating Day February 16, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-5 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that Viridity did not have a Real-Time Ancillary Service Supply Responsibility for RRS for any 15-minute Settlement Interval on Operating Day February 17, 2021.
- b. If your answer to subpart (a) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time Ancillary Service Supply Responsibility for any 15-minute Settlement Interval on Operating Day February 17, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-6 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that Viridity did not have a Real-Time Ancillary Service Supply Responsibility for RR S for any 15-minute Settlement Interval on Operating Day February 18, 2021
- b. If your answer to subpart (a) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time Ancillary Service Supply Responsibility for any 15-minute Settlement Interval on Operating Day February 18, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-7 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that Viridity did not have a Real-Time Ancillary Service Supply Responsibility for RRS that included RR S provided from Non-Controllable Load Resources for any 15-minute Settlement Interval at or before 9:00 a.m. on Operating Day February 19, 2021.
- b. If your answer to subpart (a) is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time Ancillary Service Supply Responsibility for any 15-minute Settlement Interval at or before 9:00 a.m. on Operating Day February 19, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-8 Please refer to the rebuttal testimony of Michael Pavo at page 13, lines 3-18.

- a. Please admit that Viridity did not have a validated Real-Time RR S Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 16, 2021
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time RR S Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 16, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

- a. Viridity can neither admit nor deny as it is not clear what ERCOT intends by the phrase "validated Real-Time RRS Ancillary Service Schedule." However, Viridity's position is that the deployed Load Resources had an Ancillary Service Schedule of 0 during the Disputed Payment Period.
- b. The Ancillary Service Schedule is the Ancillary Service Resource Responsibility minus the deployment by ERCOT. For the Ancillary Service Resource Responsibility and deployment by ERCOT, see the Rebuttal Testimony of Michael Pavo at pages 9 to 14 and the Protocols and documents referenced therein. For ERCOT's Dispatch Instructions during the Emergency Condition, ERCOT is in possession of such documents. The Viridity Load Resources had a combined 78 MW Ancillary Service Resource Responsibility as indicated in the Rebuttal Testimony of Michael Pavo pages 13 to 14 from the Load Resources identified on Exhibit MP-5 to Mr. Pavo's Direct Testimony. Exhibit MP-5 is data from ERCOT's 60 day SCED report for each Load Resource and summed.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-9 Please refer to the rebuttal testimony of Michael Pavo at page 13, lines 3-18.

- a. Please admit that Viridity did not have a validated Real-Time RRS Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 17, 2021.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time RRS Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 17, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

- a. Viridity can neither admit nor deny as it is not clear what ERCOT intends by the phrase "validated Real-Time RRS Ancillary Service Schedule." However, Viridity's position is that the deployed Load Resources had an Ancillary Service Schedule of 0 during the Disputed Payment Period.
- b. The Ancillary Service Schedule is the Ancillary Service Resource Responsibility minus the deployment by ERCOT. For the Ancillary Service Resource Responsibility and deployment by ERCOT, see the Rebuttal Testimony of Michael Pavo at pages 9 to 14 and the Protocols and documents referenced therein. For ERCOT's Dispatch Instructions during the Emergency Condition, ERCOT is in possession of such documents. The Viridity Load Resources had a combined 78 MW Ancillary Service Resource Responsibility as indicated in the Rebuttal Testimony of Michael Pavo pages 13 to 14 from the Load Resources identified on Exhibit MP-5 to Mr. Pavo's Direct Testimony. Exhibit MP-5 is data from ERCOT's 60 day SCED report for each Load Resource and summed.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-10 Please refer to the rebuttal testimony of Michael Pavo at page 13, lines 3-18.

- a. Please admit that Viridity did not have a validated Real-Time RRS Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 18, 2021.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time RRS Ancillary Service Schedule for any 15-minute Settlement Interval on Operating Day February 18, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

- a. Viridity can neither admit nor deny as it is not clear what ERCOT intends by the phrase "validated Real-Time RRS Ancillary Service Schedule." However, Viridity's position is that the deployed Load Resources had an Ancillary Service Schedule of 0 during the Disputed Payment Period.
- b. The Ancillary Service Schedule is the Ancillary Service Resource Responsibility minus the deployment by ERCOT. For the Ancillary Service Resource Responsibility and deployment by ERCOT, see the Rebuttal Testimony of Michael Pavo at pages 9 to 14 and the Protocols and documents referenced therein. For ERCOT's Dispatch Instructions during the Emergency Condition, ERCOT is in possession of such documents. The Viridity Load Resources had a combined 78 MW Ancillary Service Resource Responsibility as indicated in the Rebuttal Testimony of Michael Pavo pages 13 to 14 from the Load Resources identified on Exhibit MP-5 to Mr. Pavo's Direct Testimony. Exhibit MP-5 is data from ERCOT's 60 day SCED report for each Load Resource and summed.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-11 Please refer to the rebuttal testimony of Michael Pavo at page 13, lines 3-18.

- a. Please admit that Viridity did not have a validated Real-Time RRS Ancillary Service Schedule for any Non-Controllable Load Resource for any 15-minute Settlement Interval at or before 9:00 a.m. on Operating Day February 19, 2021.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW amount of Real-Time RRS Ancillary Service Schedule for any 15-minute Settlement Interval at or before 9:00 a.m. on Operating Day February 19, 2021 you contend Viridity had, and produce all documents, information or data showing that amount, and explain where the documents, information or data came from and who created them and when they were created.

RESPONSE:

- a. Viridity can neither admit nor deny as it is not clear what ERCOT intends by the phrase "validated Real-Time RRS Ancillary Service Schedule." However, Viridity's position is that the deployed Load Resources had an Ancillary Service Schedule of 0 during the Disputed Payment Period.
- b. The Ancillary Service Schedule is the Ancillary Service Resource Responsibility minus the deployment by ERCOT. For the Ancillary Service Resource Responsibility and deployment by ERCOT, see the Rebuttal Testimony of Michael Pavo at pages 9 to 14 and the Protocols and documents referenced therein. For ERCOT's Dispatch Instructions during the Emergency Condition, ERCOT is in possession of such documents. The Viridity Load Resources had a combined 78 MW Ancillary Service Resource Responsibility as indicated in the Rebuttal Testimony of Michael Pavo pages 13 to 14 from the Load Resources identified on Exhibit MP-5 to Mr. Pavo's Direct Testimony. Exhibit MP-5 is data from ERCOT's 60 day SCED report for each Load Resource and summed.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-12 Please refer to the rebuttal testimony of Michael Pavo at pages 11-12. Does Viridity contend that its Ancillary Service Supply Responsibility for Operating Day February 15, 2021 should be continued and applicable for the Disputed Payment Period?

- a. If so, does it contend the MW amount of that Ancillary Service Supply Responsibility should be the amount that was in place upon deployment on February 15, 2021 at approximately 1:07 am, the amount that was in place for the last 15-minute Settlement Interval on February 15, 2021, or some other amount?
- b. Please explain in detail the basis for your answer and identify each Protocol that Viridity relies on for its contention and its MW amount and Settlement Interval answer.

RESPONSE:

- a. The Ancillary Service Resource Responsibility for the 78 MW of deployed Load Resources continues and is applicable for the Disputed Payment Period. Viridity is not claiming recovery for any higher amount, but to the extent that ERCOT claims a higher amount, then ERCOT should compensate for the higher amount under ERCOT's theory and practice.
- b. See the Rebuttal Testimony of Michael Pavo at pages 9 to 14 and the Protocols and documents referenced therein for identifying the Protocol extending the Ancillary Service Supply Responsibility for deployed Load Resources and Exhibit MP-5 to the Direct Testimony of Michael Pavo identifying the 78 MW of MW deployed Load Resources. For ERCOT's Dispatch Instructions during the Emergency Condition, ERCOT is in possession of such documents. Viridity is not claiming a higher amount as the 78 MW is all that should be compensated for. If Viridity had been permitted to submit trades or offers for the Operating Days subsequent to February 15, then it would have submitted 78 MW of RRS.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-13 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that for the last 15-minute interval for Operating Day February 15, 2021, Viridity's Non-Controllable Load Resources had an aggregate Ancillary Service Resource Responsibility of at least 117 MW.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the aggregate MW amount of Ancillary Service Resource Responsibility that you contend Viridity's Non-Controllable Load Resources had during the last fifteen-minute interval for Operating Day February 15, 2021.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-14 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that at the time Viridity received ERCOT's initial Dispatch Instruction at approximately 1:07 a.m. on Operating Day February 15, 2021, Viridity's Non-Controllable Load Resources had an aggregate Ancillary Service Resource Responsibility of at least 117 MW.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the aggregate MW amount of Ancillary Service Resource Responsibility that you contend Viridity's Non-Controllable Load Resources had at the time Viridity received ERCOT's initial Dispatch Instruction at approximately 1:07 a.m. on Operating Day February 15, 2021.

RESPONSE:

Viridity cannot admit or deny at this time as it is still under review. Viridity will supplement by October 11, 2023.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-15 Please refer to the rebuttal testimony of Michael Pavo at page 9, lines 8-15.

- a. Please admit that Viridity's telemetry during the Disputed Payment Period reported 0 MW of Ancillary Service Resource Responsibility for Non-Controllable Resources represented by Viridity.
- b. If your answer is anything other than an unqualified "admit," please provide a detailed explanation for your answer, including the MW of Ancillary Service Resource Responsibility for Non-Controllable Resources represented in Viridity's telemetry during the Disputed Payment Period.

RESPONSE:

- a. Admit.
- b. Not applicable.

Preparer: Michael Pavo, Viridity Head of Operations

Sponsor: Michael Pavo, Viridity Head of Operations

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ERCOT 6-16 Please refer to the rebuttal testimony of Jess Totten at page 35.

- a. Please admit that Viridity did not seek a good cause exception in its Amended Complaint and Appeal filed on August 18, 2022. See Dkt. 53377-90.
- b. If the answer is anything other than “admit,” please point to the specific page on which Viridity sought a good cause exception in its Amended Complaint and Appeal filed on August 18, 2022.

RESPONSE:

- a. Admit. The Amended Complaint does not mention the phrase “good cause exception” but the relief is the same relief.
- b. Not applicable.

Preparer: Counsel

Sponsor: Counsel

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ERCOT 6-17 Please refer to the rebuttal testimony of Jess Totten at page 35.

- a. Please identify each Protocol provision for which Viridity seeks a good cause exception.
- b. For each Protocol provision listed in response to subpart (a), please describe in detail all reasons why Viridity claims it should be granted a good cause exception.

RESPONSE:

- a. The request for a good cause exception is an alternative request in the event that the Commission determines that the Load Resources should have been offered or traded (as ERCOT and Staff argue) for each subsequent Operating Day and to any telemetry or COP issues in order to receive compensation or credit for providing the instructed RRS under an extended deployment in an Emergency Condition. The Protocols governing self-scheduling, offers, and trades are generally governed by Protocols 4.4.7 and the subsections therein.
- b. The same reasons Viridity's claims should be granted support the granting of a good cause exception. See the direct and rebuttal testimony of Jess Totten describing in detail all reasons why Viridity claims, in the alternative, it should be granted a good cause exception. Viridity's claims should be granted because the Viridity Load Resources provided RRS during an extended deployment in an Emergency Condition. Both Commission Rules and ERCOT Protocols prohibit submitting offers or trades for Load Resources that do not have capacity. The capacity of a Load Resource is the net Load available for interruption. Viridity was prohibited from submitting offers or trades from the Viridity Load Resources because they did not have capacity due to the ongoing and extended deployment in an Emergency Condition.

Preparer: Counsel

Sponsor: Counsel

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ERCOT 6-18 Please refer to the rebuttal testimony of Michael Pavo at page 18, lines 5-15. Please produce all communications between Viridity and PPM related to imbalance charges for Operating Day February 15, 2021 and/or the Disputed Payment Period.

RESPONSE:

Viridity has objected to this RFI.

Preparer: Counsel

Sponsor: Counsel

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ERCOT 6-19 Please produce all communications between Viridity and Lone Star Demand Response related to imbalance charges for Operating Day February 15, 2021 and/or the Disputed Payment Period.

RESPONSE:

Viridity has objected to this RFI.

Preparer: Counsel

Sponsor: Counsel