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Filing Date - 2024-03-18 02:02:54 PM

Control Number - 53377

Item Number - 453

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

COMPLAINT OF ENGIE ENERGY	§	BEFORE THE STATE OFFICE
MARKETING NA, INC. AND VIRIDITY	§	OF
ENERGY SOLUTIONS, INC. AGAINST	§	ADMINISTRATIVE HEARINGS
THE ELECTRIC RELIABILITY	§	
COUNCIL OF TEXAS, INC.	§	

COMMISSION STAFF WITNESS LIST AND EXHIBIT LIST

In accordance SOAH Order No. 27, directing parties to prefile Exhibit Lists and Witness Lists by March 18, 2024. The Staff (Staff) of the Public Utility Commission of Texas (Commission) provides the following information regarding Staff's witnesses and cross-examination. Staff intends to present Thuy Huynh as its witness for the hearing on the merits.

At this time, Staff intends to cross examine ENGIE Energy Marketing, Inc. (ENGIE) and Viridity Energy Solutions, Inc's (Viridity) witnesses Ray Cunningham, Jess K. Totten, and Michael Pavo for Direct and Rebuttal. Staff waives cross examination of ENGIE Energy Marketing and Viridity Energy Solutions, Inc's witness Robert Helton and ERCOT witness Kenan Ogelman and David J. Maggio. However, Staff respectfully reserves its right to ask follow-up questions based on cross-examination by other parties. Counsel appearing in person for Staff will be Floyd Walker and Kim Van Winkle. Staff also understands that Jenna Keller, counsel for Potomac Economics, may attend the hearing in person.

With regard to exhibits, Staff provides the following exhibit list:

NUMBER	DESCRIPTION	OFFERED	ADMITTED
1	Direct Testimony of Thuy Huynh (AIS Interchange Item No. 446)		
2	Staff Exhibit No. 1 - Electronic Messages regarding BRKRG_LD5 (AIS Interchange Item No. 130)		
3	Staff Exhibit No. 2- Electronic Messages for HPWRD_LD2 (AIS Interchange Item No. 130)		
4	Staff Exhibit No. 3 - Current Operating Plan for BRKRG_LD5 (AIS Interchange Item No. 130)		
5	ERCOT Exhibit for the Record No. 6-8(a).1 (AIS Interchange Item No. 16)		

6	ERCOT Exhibit for the Record No. 6-8(a).2 (AIS Interchange Item No. 16)		
7	ERCOT Exhibit for the Record No. 6-8(d-e) (AIS Interchange Item No. 16)		
8	ERCOT Exhibit for the Record No. 6-8(f) (AIS Interchange Item No. 16)		
9	Energy Management Agreement between Viridity and EDF (EDF000013-37)		
10	ENGIE ADR Market Notice (AIS Interchange Item No. 91)		
11	ENGIE ADR Request Form (AIS Interchange Item No.12)		
12	ENGIE Energy Marketing NA, Inc.'s Response to ERCOT's First set of Requests for Information 1-3 (AIS Interchange Item No. 53)		
13	ENGIE Energy Marketing NA, Inc.'s First Request for Information to Staff 1-2 to 1-5 (AIS Interchange Item No. 88)		
14	ENGIE Energy Marketing NA, Inc.'s Response to Staff's Second set of Requests for Information 2-28 (AIS Interchange Item No. 185)		
15	ERCOT Response to ENGIE/Viridity 4th RFI 4-6 (AIS Interchange Item No. 81)		
16	ERCOT Response to Complainants' 5th RFI 5-1 (AIS Interchange Item No. 208)		
17	ERCOT Response to Complainants' 5th RFI 5-2 (AIS Interchange Item No. 208)		
18	ERCOT Response to Complainants' 5th RFI 5-3 (AIS Interchange Item No. 208)		
19	ERCOT Response to joint 6-8 (AIS Interchange Item No. 231)		
20	ERCOT Response to Complainants' 7th Set of RFI 7-1 (AIS Interchange Item No. 362)		
21	ERCOT First Supplemental Response to Certain of Complainants' Seventh Set of Requests for Information 7-8 (AIS Interchange Item No. 380)		
22	ERCOT First Supplemental Response to Certain of Complainants' Seventh Set of Requests for Information 7-9 (AIS Interchange Item No. 380)		

23	ERCOT Response to Complainants' 7th Set of RFI 7-34 (AIS Interchange Item No. 362)		
24	ERCOT First Supplemental Response to Certain of Complainants' Seventh Set of Requests for Information 7-35 (AIS Interchange Item No. 380)		
25	Email Exchange of Michael Pavo (EDF000221)		
26	Notarized Affidavit of Blake Holt (AIS Interchange Item No.104)		
27	Viridity ADR Market Notice (AIS Interchange Item No. 91)		
28	Viridity ADR Request Form (AIS Interchange Item No. 12)		
29	Viridity Energy Solutions, Inc.'s Response to ERCOT's First Request for Information 1-8 (AIS Interchange Item No. 55)		
30	Viridity Energy Solutions Inc.'s Response to ERCOT's Sixth Set of Requests for Information 6-15 (AIS Interchange Item No. 394)		
31	Viridity Energy Solutions, Inc.'s Response to Commission Staff's Second set of Requests for Information 2-8 (AIS Interchange Item No. 106)		
32	Viridity Energy Solutions, Inc.'s Response to Commission Staff's Second set of Requests for Information 2-11 (AIS Interchange Item No. 106)		
33	Viridity Energy Solutions, Inc.'s Response to Staff's Third set of Requests for Information 3-16 (AIS Interchange Item No. 187)		
34	Viridity Schedule 2-15 Email (EDF000144)		
35	Viridity Schedule 2-16 Email (EDF000201)		
36	Viridity Schedule 2-17 Email (EDF000301)		
37	Viridity Schedule 2-18 Email (EDF000358)		

38	Viridity Schedule 2-19 Email (EDF000398)		
39	Viridity Schedule 2-20 Email (EDF002124)		
40	Viridity Energy Solutions, Inc.'s Supplemental Response to Staff's Second set of Requests for Information 2-13 and 2-16 (AIS Interchange Item No. 221)		

Date: March 18, 2024

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
MARKET ANALYSIS DIVISION**

Harika Basaran
Division Director

/s/ R. Floyd Walker

R. Floyd Walker, Senior Counsel
State Bar No. 24044751
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7261
(512) 936-7268 (facsimile)
floyd.walker@puc.texas.gov

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Marisa Lopez Wagley
Division Director

/s/ Anthony Kanalas

Anthony Kanalas
State Bar No. 24125640
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7459
(512) 936-7268 (facsimile)
Anthony.Kanalas@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that unless otherwise ordered by the presiding officer, notice of the filing of this document will be provided to all parties of record via electronic mail on March 18, 2024 in accordance with the Second Order Suspending Rules, issued in Project No. 50664.

/s/ R. Floyd Walker
R. Floyd Walker