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To: The Texas PUC

From Teresa Goodwin, San Antonio, Texas

Subject: Electricity Market Design – my public comments

I do not support the recommendation by the PUC. It is extremely costly for what we Texans would get in return and does not provide Texas with affordable power that would sustain us through a freeze like February 2021.

The legislature in late 2021 (after the big freeze) tasked the PUC to “analyze and recommend design updates to the Texas wholesale electricity market that will strengthen current and long-term reliability reforms to the state’s electric grid” yet the PUC chose not to include the 2021 Big Freeze data in this analysis. Then what was the point? The legislature made this request after the Big Freeze and primarily because of it. Yet the PUC chose to spend our taxpayer dollars on an analysis that doesn’t address the elephant in the room (the big freeze). The PUC officials should have to pay for this multi million dollar analysis out of their own pockets.

Thus this entire costly exercise is worthless.

To make matters even worse, the PUC’s chair, Peter Lake, recommends a plan that is not even delineated in the response from the consultant, E3, who was commissioned to do the analysis and propose plans. Instead, he recommends a plan that is cut and pasted by the commission staff called the Performance Credits Mechanism (PCM). Even E3 doesn’t support it.

On review of this PCM plan that Lake recommends, it looks like it just pours more money into fossil fuel providers, lets private companies manage risk, and leaves ERCOT unable to guarantee electricity for Texas in extreme events just like the 2021 Big Freeze. The PUC’s proposal also excludes renewable energy sources some of which is cheaper. It does not fix the grid, is more costly, and gives private industry more power over our grid. Again what is the point? The PUC has failed to fulfill the task it needed to address.

We are doomed to more Big Freezes like 2021 or extreme heat catastrophes if the PUC’s recommendation is enacted, and our Texas leaders will be responsible for hundreds more needless deaths and slow progress toward a strong grid.

Texans deserve better.