



## Filing Receipt

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**PROJECT NO. 54335**

**REVIEW OF MARKET REFORM  
ASSESSMENT PRODUCED BY  
ENERGY AND  
ENVIRONMENTAL ECONOMICS,  
INC. (E3)**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**BROAD REACH POWER LLC’S COMMENTS IN RESPONSE TO COMMISSION  
QUESTIONS REGARDING THE E3 REPORT**

Broad Reach Power LLC ("Broad Reach") submits the following comments in response to the questions filed by the Commission on November 15, 2022 in PUC Project 54335, *Review of Market Reform Assessment Produced by Energy and Environmental Economics, Inc. (E3)*. Comments are due by noon on December 15, 2022. These comments are timely filed.

**I. INTRODUCTION AND SUMMARY**

Broad Reach is a Houston-based Independent Power Producer focused on standalone battery storage (ESR). The company currently owns and operates 350 MW of ESR in ERCOT, with 825 MW expected to come online in 2023, and over 7,000 MW of additional projects currently in the ERCOT queue. Accordingly, Broad Reach has significant stakeholder interest in any ERCOT market redesign efforts such as those proposed in the E3 Report. Broad Reach acknowledges and appreciates the hard work that the Public Utility Commission of Texas ("Commission") and its Staff have done to address reliability issues on the ERCOT grid by engaging stakeholder participation in market redesign discussions.

**II. COMMENTS ON THE E3 REPORT**

While Broad Reach does not provide feedback on the individual questions posed by the Commission in its November 15<sup>th</sup> filing, Broad Reach submits these comments to indicate its general support for the Performance Credit Mechanism ("PCM") as outlined in the E3 Report. Broad Reach supports the policy direction signaled by the PCM but notes that the implementation of the PCM or a similar market design concept will necessarily require detailed considerations addressed through ERCOT processes (such as through the Nodal Protocols Revision Request process involving consideration by various ERCOT subcommittees). Broad Reach intends to

participate in these processes to the extent necessary to ensure that implementation of the PCM, should the Commission choose to adopt this proposal, will allow Broad Reach's resources to remain competitive in the ERCOT markets.

### **III. CONCLUSION**

Broad Reach appreciates the opportunity to provide input on these important questions and looks forward to continuing to participate in this proceeding and additional market design discussions in pursuit of a more robust and reliable ERCOT system.

Dated: December 15, 2022

Respectfully submitted,

/s/ Steve Vavrik

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**AUTHORIZED REPRESENTATIVE FOR  
BROAD REACH POWER, LLC**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**EXECUTIVE SUMMARY OF BROAD REACH POWER LLC'S COMMENTS IN  
RESPONSE TO COMMISSION QUESTIONS REGARDING THE E3 REPORT**

- Broad Reach is a Houston-based Independent Power Producer focused on standalone battery storage (ESR). The company currently owns and operates 350 MW of ESR in ERCOT, with 825 MW expected to come online in 2023, and over 7,000 MW of additional projects currently in the ERCOT queue. Accordingly, Broad Reach has significant stakeholder interest in any ERCOT market redesign efforts such as those proposed in the E3 Report.
- Broad Reach acknowledges and appreciates the hard work that the Public Utility Commission of Texas ("Commission") and its Staff have done to address reliability issues on the ERCOT grid by engaging stakeholder participation in market redesign discussions.
- Broad Reach submits these comments to indicate its general support for the Performance Credit Mechanism ("PCM") as outlined in the E3 Report. Broad Reach supports the policy direction signaled by the PCM but notes that the implementation of the PCM or a similar market design concept will necessarily require detailed considerations addressed through ERCOT processes (such as through the Nodal Protocols Revision Request process involving consideration by various ERCOT subcommittees).
- Broad Reach intends to participate in these processes to the extent necessary to ensure that implementation of the PCM, should the Commission choose to adopt this proposal, will allow Broad Reach's resources to remain competitive in the ERCOT markets.