**Comments of the Lower Colorado River Authority on the Technical Advisory Committee Proposed Structural and Procedural Review**

The Lower Colorado River Authority (LCRA) appreciates the opportunity to comment on the proposed Technical Advisory Committee (TAC) 2010 Structural and Procedural Review. LCRA supports the ongoing effort of the TAC to review its procedures and subcommittee structure. The process described in the review document is an appropriate and efficient method to conduct that review.

LCRA supports the proposed TAC recommendation to maintain the Protocol Revision Subcommittee. LCRA also supports the various work group and task force consolidations and retirements. However, it does not support the transformation of the Commercial Operations Subcommittee (COPS) into a working group at this time. Given the importance of the settlement process in the market, and with the implementation of the Nodal Market, LCRA believes keeping COPS functional for the first year of the Nodal Market is critical. As stated above, LCRA supports the ongoing effort of TAC to review its structure every year and finds that it is appropriate to consider the retirement of its subcommittees on an annual basis.

The proposed 2010 Structural and Procedural Review document specifies several criteria for review:

1. Effectiveness;

2. Efficiency;

3. Transparency; and

4. Fairness

LCRA structured its comments (see attached) based on these four criteria.

LCRA also supports alterations to the meeting schedule that allow for WMS to provide comments to PRS a week in advance of the PRS meeting.

In addition, LCRA reviewed the Nodal Protocol Revision Requests (NPRR) filed since the inception of the Nodal Protocols and found the following:[[1]](#endnote-1)

|  |  |
| --- | --- |
| **NPRR Sponsor** | **Percentage of NPRRs** |
| ERCOT | 48% |
| Stakeholder Groups | 39% |
| Individual Market Participants | 13% |

Thank you for your consideration of the LCRA comments.

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1. Present count of NPRRs filed for this analysis was 279 [↑](#endnote-ref-1)