

May 11, 2018

**Supplemental Comments of Southern Cross Transmission LLC
Regarding Proposed Amendments to Segment Definitions in the ERCOT Bylaws**

Southern Cross Transmission LLC (SCT) appreciates the efforts of ERCOT and its stakeholders to complete the tasks ordered by the PUCT in Project No. 46304, including debating the question of which market segment is appropriate for a DC Tie Operator which does not meet the current Investor-Owned Utility market segment definition.

Having participated in the discussion and considered ERCOT stakeholder comments, SCT requests ERCOT and the stakeholders delay action on the market segment question at this time. As the stakeholders have worked through the issues in Directive 1, it has become clear that NPRR 857 and NOGRR 177 are the work products essential to integrating the SCT Project with ERCOT, whereas the Bylaws amendment is not needed purely from a market operations perspective. Moreover, SCT does not believe its project development schedule or ERCOT's work on other Directives will be harmed by delaying the decision on the best market segment assignment until a later date.

SCT truly appreciates the quality work and discussion of ERCOT and the stakeholders thus far on the various PUCT Directives in Project No. 46304. SCT hopes by the time the market segment question comes back around, greater stakeholder familiarity with the SCT Project will ease some of the controversy currently associated with the question of the appropriate market segment assignment for DC Tie Operators.

Submitted on behalf of Southern Cross Transmission LLC by:

Mark Bruce
Principal
Cratylus Advisors
mobile: 512-810-1516
mark.bruce@cratyl.us