

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Sierra Estrella Energy Storage LLC
Superstition Energy Storage LLC

Docket Nos. ER24-1420
ER24-1421

Comment of Public Citizen, Inc.

On March 6, affiliates Sierra Estrella Energy Storage LLC and Superstition Energy Storage LLC applied for market-based rate authority. The application notes they are 60% owned by LFG Plus Power LLC and 40% by Plus Power Enterprises LLC.¹ The application states that Plus Power Enterprises LLC “is wholly owned by TWG Global Holdings, LLC, a closely held investment company which is wholly owned by a private individual”,² and, for some reason, declines to identify that private individual.

Public Citizen’s research suggests that Mark R. Walter is the owner not only of TWG Global Holdings LLC, but also the CEO of Guggenheim Partners, an investment firm with over \$310 *billion* in assets³ (in addition Mr. Walter owns Major League Baseball’s Los Angeles Dodgers, the English Premier League’s Chelsea Football Club, and other sports leagues and franchises).

Page 1 of the cover letter to the application appears to contain a typographical error, as it reads “Applicants also request waiver of the Commission’s notice requirements to permit an effective date of March 18, 2023”. We assume that applicants meant 2024, not 2023.

Respectfully submitted,

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¹ *Application*, at page 3.

² *Application*, at page 4.

³ www.guggenheimpartners.com