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PROJECT NO. 38578

ENERGY EFFICIENCY	§	PUBLIC UTILITY COMMISSION
IMPLEMENTATION PROJECT	§	
UNDER 16 TAC § 25.181	§	OF TEXAS

COMMENTS OF ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.
REGARDING TDU LOAD MANAGEMENT PROGRAMS FOR WINTER 2022-23

Electric Reliability Council of Texas, Inc. (ERCOT) submits these comments in response to the November 17, 2022 request for comments related to the winter load management pilot program notices filed by Texas New Mexico Power Company (“TNMP”), AEP Texas, Inc. (“AEP”), and CenterPoint Energy Houston Electric LLC (“CenterPoint”).

Specifically, on October 28, 2021, Oncor Electric Delivery Company LLC (“Oncon”) filed comments in this docket noting that it was developing a pilot program pursuant to 16 TAC § 25.181 that will provide load reduction resources to ERCOT consistent with PURA § 38.075(e) during winter weather emergencies and as part of Oncon’s 2022 energy efficiency program portfolio. On November 10, 2022, November 14, 2022, and November 18, 2022 respectively, TNMP, AEP, and CenterPoint each filed comments stating that they would similarly be conducting winter load reduction pilot programs for winter 2022-23 and would follow the template that Oncon filed on October 28, 2021.

ERCOT files these comments to note that some form of agreement between ERCOT and the transmission and distribution utilities (TDUs) regarding the coordination of these programs is needed. Specifically, ERCOT needs visibility into TDU load management participation levels on an ongoing basis so that it can understand the likely operational impact of any ERCOT-directed deployments of these programs during an Energy Emergency Alert event.¹ For similar reasons, some consensus between ERCOT and the TDUs regarding the timing of deployments and the communications associated with these deployments is needed. For last year’s winter load management pilot programs, including the program administered by Oncon and the programs authorized by the Commission in Docket No. 52689, ERCOT and the TDUs had

¹ Upon implementation of NPRR1006, ERCOT will also need this information to accurately calculate the Real-Time Reliability Deployment Price Adder. See ERCOT Protocols § 6.5.7.3.1, Determination of Real-Time Reliability Deployment Price Adder.

agreed to basic terms that required the TDUs to provide participation information to ERCOT on an ongoing basis, as required by the Commission's order in that docket.² ERCOT expects that similar terms would be appropriate for this year's load management programs. ERCOT has communicated with Commission Staff about the need for coordination and intends to meet with the Commission Staff and the TDUs in early December to discuss and reach agreement on these terms.

Respectfully Submitted,

/s/ Katherine Gross

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² Expedited Petition of CenterPoint Energy Houston Electric, LLC for Approval of Interim Load Management Programs for Nonresidential Customers and for an Accounting Order, Docket No. 52689, Order (Jan. 12, 2022).