



Control Number: 39764



Item Number: 23

Addendum StartPage: 0

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PUBLIC UTILITY COMMISSION
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PUC PROJECT NO. 39764

**ISSUES RELATING TO ENERGY §
STORAGE AND EMERGING §
TECHNOLOGIES §**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**CONOCOPHILLIPS COMPANY'S
RESPONSE TO THE REQUEST FOR COMMENTS**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

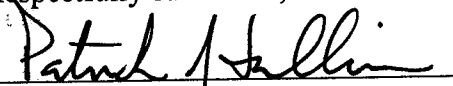
COMES NOW, ConocoPhillips Company ("ConocoPhillips") and submits its response to the request for comments in the above-referenced proceeding and respectfully shows the following:

In addition to the proposed rule amendments that the Commission has proposed in Project No. 39917,¹ the Commission Staff invited interested persons to submit comments in Project No. 39764 on any other changes to the rules that the Commission should consider to enable market participation by energy storage providers. ConocoPhillips supports the Commission's efforts to encourage the deployment of storage facilities and appreciates the opportunity to file comments on any concerns with the Commission's existing rules. Currently, ConocoPhillips is concentrating its efforts on Project No. 39917, in hopes that it will provide all of the necessary clarity concerning the treatment of storage facilities. ConocoPhillips has not determined whether additional changes will be necessary following the conclusion of Project 39917, but reserves the right to propose such changes to the Commission at a later date. Additionally, to the extent that reply comments are allowed in this project, ConocoPhillips reserves the right to respond to any proposed changes suggested by other persons.

¹ *Rulemaking on Energy Storage Issues*, Project 39917, published at 36 *TexReg* 8692 (Dec. 23, 2011) (pending).

23

Respectfully submitted,



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