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SOAH DOCKET NO. 473-17-0684  
PROJECT NO. 46368

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PUBLIC UTILITY COMMISSION  
FILING CLERK

APPLICATION OF AEP TEXAS NORTH )  
COMPANY FOR REGULATORY )  
APPROVALS RELATED TO THE )  
INSTALLATION OF UTILITY-SCALE )  
BATTERY FACILITIES )  
\_\_\_\_\_ )

BEFORE THE  
STATE OFFICE OF  
ADMINISTRATIVE HEARINGS

**ENERGY STORAGE ASSOCIATION MOTION TO INTERVENE**

The Energy Storage Association (ESA), pursuant to Sections 22.103(b) and 22.104 of the Commission's Rules of Practice and Procedures and SOAH Order No. 1 issued in this docket on October 19, 2016, files this Motion to Intervene in the above-referenced proceeding.

**I. Authorized Representative**

The name, address and telephone number of ESA's authorized representative is as follows:

Jason Burwen  
Policy & Advocacy Director, Energy Storage Association  
1800 M Street NW, Suite 400S  
Washington DC 20010  
(202) 580-6285  
j.burwen@energystorage.org

All pleadings or other documents filed in this proceeding shall be served upon ESA's authorized representative.

**II. Standing to Intervene**

ESA is a trade association representing a diverse group of electric sector stakeholders engaged in energy storage deployment, including utilities, independent power producers, manufacturers of advanced technologies -- such as batteries, flywheels, thermal energy storage, compressed air energy storage, supercapacitors, and other technologies -- component suppliers, and system integrators. ESA members have deployed nearly 1,000 MW of advanced energy storage on the nation's electric grids. ESA member

companies currently operate or are in the process of commissioning grid-connected energy storage projects in Texas, including in ERCOT. ESA members are also participants in the ERCOT market and operate generation assets other than battery storage.

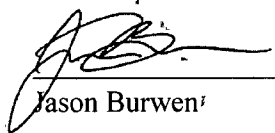
On September 16, 2016, AEP Texas North Company (AEP) filed an application for regulatory approvals relating to the installation of utility-scale battery facilities at its Woodson and Paint Rock, Texas facilities. AEP's application states that the batteries will be considered distribution assets whose cost will be eligible for inclusion in AEP's distribution cost of service and are expected to approximate \$2.3 million. Because this case could set a precedent for Public Utility Commission policy regarding regulatory treatment of energy storage assets and raises issues of importance to the entire ERCOT system, ESA member companies may be impacted by the relief requested by AEP Texas North Company. Therefore, ESA has a justiciable interest in this proceeding.

### **III. Conclusion**

ESA respectfully requests that this Motion to Intervene be granted, and that the Commission consider the issue of developing a regulatory framework for storage systems.

DATED the 31<sup>st</sup> of October, 2016.

Respectfully submitted,

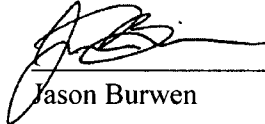
  
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Jason Burwen

Policy & Advocacy Director  
ENERGY STORAGE ASSOCIATION  
1800 M Street NW, Suite 400S  
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202.580.6285  
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cc: Service List

**CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the foregoing has been hand delivered or sent via facsimile transmission or first class United States mail, postage prepaid, to all parties of record in this proceeding on this the 31<sup>st</sup> day of October, 2016.

  
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Jason Burwen

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