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## PROJECT NO. 49125

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## **REVIEW OF ISSUES RELATING TO ELECTRIC VEHICLES**

## PUBLIC UTILITY COMMISSION COMMISSION FILING CLERK OF TEXAS

## COMMENTS OF TEXAS ELECTRIC COOPERATIVES, INC.

Texas Electric Cooperatives, Inc. (TEC) thanks the staff of the Public Utility Commission of Texas (Commission) for its attention to the important issues surrounding the adoption of electric vehicles in Texas and the associated implications for the electric system.<sup>1</sup> Although TEC is not at this time responding to the specific questions posed by staff in their request for comment, TEC provides these general comments to outline how cooperatives currently approach the issues identified by staff and to indicate TEC's ongoing interest in this project and its intent to participate as discussion of these issues continues.<sup>2</sup>

Many of TEC's member systems are characterized by low customer density and remote, rural service areas. TEC's members generally have not seen a significant penetration of electric vehicles in these areas. While cooperatives continue to monitor relevant industry trends and gauge their members' interest in the adoption of electric vehicles, many have not identified transportation electrification as a priority in the service of their members. In higher-density areas, certain cooperatives have deployed charging stations to meet observed demand and work with commercial developers to ensure visibility into planned charging stations. Should a cooperative receive a request to connect a DC fast charging station to its system, the cooperative would review the impact of the request through the existing line extension process, and any upgrades in infrastructure necessary to accommodate the station would be addressed through this process. The current practices in place to manage new load additions appear adequate to incorporate demand related to electric vehicle charging stations in cooperative service areas.

<sup>&</sup>lt;sup>1</sup> Public Utility Commission of Texas Public Notice of Request for Comments, Project No. 49125 (Dec. 13, 2019).

<sup>&</sup>lt;sup>2</sup> TEC is the statewide association of electric cooperatives operating in Texas. TEC's 75 members include distribution cooperatives that provide retail electric utility service to approximately 3,000,000 consumers in statutorily authorized service areas that encompass more than half of the total area of the state. TEC's G&T members generally acquire generation resources and power supply for their member distribution cooperatives and deliver electricity to them at wholesale.

While the presence of electric vehicles in cooperative service areas has not significantly impacted how cooperatives plan their distribution systems, TEC understands the interest of certain parties in facilitating the future deployment of charging stations in areas where such a service may not currently be available. TEC and its members look forward to participating in the ongoing discussion of these issues as this project progresses, and TEC appreciates Commission staff's efforts in this proceeding.

Dated: February 3, 2020

Respectfully submitted,

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