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**PROJECT NO. 52373**

**REVIEW OF WHOLESALE ELECTRIC  
MARKET DESIGN**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**EXECUTIVE SUMMARY**

Enel North America (Enel) appreciates the opportunity to provide feedback.

- In order to expedite the development of new load management programs for non-residential customers, the Commission should require utilities to take advantage of existing expertise by competitive providers of these load management services.
- The Commission should expand Emergency Response Service procurement. The Commission may achieve this by lifting the \$50 million cap or replacing it with a goal for ERCOT to procure 5% of ERCOT's peak demand through ERS by the end of 2022, and increase that goal to 10% by 2030.
- The Commission should allow long-lead resources to be eligible to participate in ERS. This will take advantage of additional resources on the system and give ERCOT additional time to line-up ERS resources.
- Load Resources should be allowed to participate in all services they are technically capable of providing.

Respectfully submitted,

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MARKET DESIGN**

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**PUBLIC UTILITY COMMISSION  
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**ENEL OVERVIEW**

Enel North America (Enel) appreciates the opportunity to provide feedback. Enel is a multinational power company and a leading integrated player in the global power, gas and renewables markets. It is the largest European utility by market capitalization and ordinary EBITDA, and is present in over 30 countries worldwide, producing energy with over 88 GW of managed capacity. Enel distributes electricity through a network of over 1.3 million miles, and with over 73 million business and household end users globally, the Group has the largest customer base among its European peers.

Enel's renewables arm, Enel Green Power, is the world's largest renewable private player, managing around 46 GW of wind, solar, geothermal and hydropower plants in Europe, the Americas, Africa, Asia and Oceania. Enel operates in the US and Canada through two companies: Enel Green Power North America and Enel X North America. Enel Green Power North America is a leading owner and operator of renewable energy plants with a presence in 18 US states and one Canadian province. The company operates around 70 plants with a managed capacity of over 6 GW powered by wind, hydropower, geothermal and solar energy.

Enel X in North America has around 4,500 business customers, spanning more than 35,000 sites, representing approximately \$10.5B in energy spend under management, approximately 4.7 GW of demand response capacity and over 70 battery storage projects that are operational and under contract. Enel X is revolutionizing the EV charging market with its smart charging solutions deploying around 60,000 charging stations in the US.

## COMMENTS FROM ENEL NORTH AMERICA, INC.

In response to Commission Questions 1, 2 and 4, Enel will not provide separate responses, but supports comments filed by the Advanced Energy Management Association (AEMA) and the Texas Advanced Energy Business Alliance (TAEBA).

### **3. How should utilities' existing programs, such as those designed pursuant to 16 TAC §25.181, be modified to provide additional reliability benefits?**

Senate Bill 3, Section 16, New Sec. 38.075(e) requires the Commission to allow TDSPs to implement new load management programs for non-residential customers. In order to expedite the development of these additional programs, the Commission should require utilities to take advantage of existing expertise by competitive providers of these load management services.

### **5. What changes should be made to non-residential load-side products, programs, or what programs should be developed to support reliability in the future?**

Load-side products have a proven history of providing reliability benefits. Changes to load-side products will encourage more load resources to participate and provide reliability benefits. The following are specific recommendations to improve non-residential demand response.

#### **Lift the Current Expenditure Cap on Emergency Response**

Currently, ERS participation is limited by a \$ 50 million cap on ERCOT's expenditures to procure ERS. Enel recommends that the Commission lift that cap to increase participation. If no new additional ancillary or reliability products are added to the ERCOT market, or until they are implemented, the cap should be lifted to \$200 million or replaced with a goal for ERCOT to procure 5% of ERCOT's peak demand through ERS by the end of 2022, and increase that goal to 10% by 2030.

If and when new ancillary or reliability products are implemented, demand response resources should be able to participate in the competitive procurement for those services, the same as any other resource.

#### **Allow longer-lead resources to participate in ERS**

In addition to increasing overall ERS participation, the Commission has an opportunity to increase the type of resources that participate and enable more Texas businesses to participate in the ERS program. Currently, the ERS program is limited to resources with 10- and 30-minute response times. PJM has had success procuring 30-, 60-, and 120-minute demand response resources. In NYISO, 21-hour lead time resources are procured. This is akin to generation resources that take longer notice times to deploy. With longer lead resources, ERCOT would have more time to begin the process of lining up ERS resources to deploy when necessary. Extending the lead-time could enable the participation in ERS of additional commercial businesses that are located in the ERCOT region, such as plastic manufacturers, food producers, and chemical manufacturers.

**Allow Load Resources to participate in all services they are capable of providing**

Currently, Load Resources are prohibited from participating in certain ancillary services, such as Non-Spin. Load Resources should be allowed to participate in all services they are able to provide, and Enel appreciates that ERCOT has submitted NPRR 1093 that would enable Load Resources to provide this service.

**CONCLUSION**

Enel appreciates this opportunity to provide comments and looks forward to working with the Commission and other interested parties.

Respectfully submitted,

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