



## Filing Receipt

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**PROJECT NO. 52373**

**REVIEW OF WHOLESALE ELECTRIC  
MARKET DESIGN**

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**PUBLIC UTILITY COMMISSION  
  
OF TEXAS**

**COMMENTS FROM ENEL NORTH AMERICA, INC.**

**ENEL OVERVIEW**

Enel North America (Enel) appreciates the opportunity to provide feedback on the Commission's request for comment on the Load-Side Reliability Mechanism and Backstop Reliability Service.

Enel is a multinational power company and a leading integrated player in the global power, natural 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 Enel 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 United States (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 eighteen 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 that span more than 35,000 sites representing approximately \$10.5B in energy spend under management including 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 Electric Vehicle charging market with its smart charging solutions deploying around 60,000 charging stations in the US.

## **LOAD-SIDE RELIABILITY MECHANISM**

Enel supports comments filed by the Advanced Power Alliance and Advanced Energy Management Alliance. Enel submits these additional comments.

Renewable and Demand Response resources should be able to participate in a Load-Side Reliability Mechanism. These resources provide value to the grid, and if their value is not accounted for, it will drive up costs for all consumers.

Enel also generally supports the Dispatchable Energy Credit proposal and supports further examination of this proposal as a Load Side Reliability Mechanism

## **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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**EXECUTIVE SUMMARY OF ENEL COMMENTS**

- Renewable Resources and Demand Response Resources should qualify for participation in a Load-Serving Entity obligation.
- Enel supports further examination of the Dispatchable Energy Credit Proposal.