



## Filing Receipt

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**PROJECT NO. 52689**

<b>Expedited Petition of CenterPoint Energy</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>Houston Electric , LLC For Approval of</b>	<b>§</b>	<b>OF</b>
<b>Interim Load Management Programs for</b>	<b>§</b>	<b>TEXAS</b>
<b>Nonresidential Customers and for an</b>	<b>§</b>	
<b>Accounting Order</b>		

**COMMENTS OF VOLTUS**

Voltus, Inc. (“Voltus”) hereby submits these comments to the Public Utility Commission of Texas (“Commission”) regarding the Interim Load Management Programs for Nonresidential Customers proposed by AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, Texas-New Mexico Power Company, and Oncor Electric Delivery Company LLC (collectively, “Joint TDUs”).<sup>1</sup> These programs were proposed via a joint filing on October 8, 2021, and subsequently supported by a stipulation with Commission Staff filed on November 9, 2021. Applications for program participation were due to the respective TDUs on or before November 15. Seasonal offers for the ERCOT Emergency Response Service (“ERS”) program were also due on November 15, 2021. On November 16, 2021, the Commission directed the Joint TDUs to appear at the Commission’s November 18, 2021 open meeting to answer questions about these programs. The implication of the above dates is that demand response providers have already applied to the TDU programs and withheld megawatts from ERS offers to do so.

Voltus supports the Commission’s due diligence, and hopes that the Commission ultimately approves the proposed Interim programs. These programs are additive to ERS: the Interim programs would generally allow 50-300 MW, with pricing generally comparable to ERS. The ERS budget was expanded but remains capped. The Interim programs therefore present the opportunity to expand the amount of demand response available for reliability purposes. Voltus, like many providers, withheld resources from ERS with the intention of enrolling those resources in one of the Interim programs. If the Interim programs were rejected, those resources would be unable to provide dispatchable reliability during the winter season.

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<sup>1</sup> Voltus is a demand response provider that operates in all nine North American wholesale markets and has years of experience in ERCOT’s ERS program.

Sincerely,



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