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EXPEDITED PETITION OF	§	PUBLIC UTILITY COMMISSION
CENTERPOINT ENERGY HOUSTON	§	
ELECTRIC, LLC FOR APPROVAL OF	§	
INTERIM LOAD MANAGEMENT	§	OF TEXAS
PROGRAMS FOR NONRESIDENTIAL	§	
CUSTOMERS AND FOR AN	§	
ACCOUNTING ORDER	§	

COMMISSION STAFF’S RECOMMENDATION ON PROCESSING, SUFFICIENCY OF THE PETITION, SUFFICIENCY OF NOTICE, ANDE OTHER PROCEDURAL MATTERS

On October 8, 2021, AEP Texas, Inc., CenterPoint Energy Houston Electric, LLC, and Texas-New Mexico Power Company (Joint TDUs) filed an expedited petition requesting the Commission approve the Joint TDUs’ request for (1) designing and operating load management programs for nonresidential customers during the period of December 1, 2021, through February 28, 2022 (the Interim Load Management Programs) and (2) recording a regulatory asset for any and all costs associated with the design and operation of the Interim Load Management Programs and for future load management programs for nonresidential customers.

On October 12, 2021, the administrative law judge (ALJ) filed Order No. 1, directing the Staff (Staff) of the Public Utility Commission of Texas (Commission) to file a recommendation or comments on the proper processing of the petition, the sufficiency of the petition, and the sufficiency of the proposed notice, as well as a proposed procedural schedule. Therefore, this pleading is timely filed.

I. PROCESSING OF PETITION AND RECOMMENDATION ON SUFFICIENCY

Staff has reviewed the petition and recommends that the Joint TDUs be required to provide documentation outlining the details of the proposed Interim Load Management Program for nonresidential customers. The petition currently does not provide any details regarding the program for which it seeks approval and Staff recommends that the Joint TDUs be ordered to provide such information. Therefore, Staff recommends that the petition is deficient and that the Joint TDUs be ordered to provide comprehensive details regarding the Interim Load Management Program. Staff will confer with the Joint TDUs to determine what information needs to be provided

and to discuss any other issues related to this proceeding in an effort to process the petition as efficiently as possible. Staff will provide a proposed procedural schedule for further processing of the petition along with a subsequent recommendation on the sufficiency of the petition.

II. NOTICE

The Joint TDUs requested that they be required to provide notice only via publication in the *Texas Register* because potential participants are unknown at this time. Staff believes that this notice alone is insufficient. Staff recommends that, in addition to notice being published in the *Texas Register*, the Joint TDUs be ordered to notice every participant in each of the Joint TDU's last base rate case. Further, Staff recommends that, for efficiency purposes, notice be provided via e-mail to all parties if possible. Staff recommends that the Joint TDUs be ordered to issue notice as soon as is practically possible to process the petition in the timeframe requested.

III. PROPOSED PROCEDURAL SCHEDULE

Staff proposes the following procedural schedule for further processing of the petition:

Event	Date
Joint TDUs provide comprehensive details of Interim Load Management Program and proof of notice to customers	October 27, 2021
Staff supplemental recommendation on sufficiency of petition and notice	November 3, 2021
Deadline to intervene	14 days after notice is provided

IV. CONCLUSION

Staff respectfully requests an order consistent with the above recommendations.

Dated: October 20, 2021

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on October 20, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish