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PROJECT NO. 53169

REVIEW OF TRANSMISSION RATES	§	PUBLIC UTILITY COMMISSION
FOR EXPORTS FROM ERCOT	§	
	§	OF TEXAS

**OFFICE OF PUBLIC UTILITY COUNSEL'S INITIAL COMMENTS
ON THE PROPOSAL FOR PUBLICATION OF AMENDMENTS TO 16 TAC § 25.192**

The Office of Public Utility Counsel (“OPUC”) respectfully submits these initial comments on the Public Utility Commission of Texas’ (“Commission”) proposed amendments to 16 Texas Administrative Code (TAC) § 25.192, relating to Transmission Service Rates. The proposed amendments would abolish the seasonal component of the transmission charge for exporting power outside the ERCOT region by eliminating an increased charge for the months of June, July, August, and September. The Commission requests initial comments on the proposed amendments by September 1, 2022. These comments are timely filed. OPUC recommends adoption of the proposed amendments to 16 TAC § 25.192(e) as set out in the Proposal for Publication.

**I. RESPONSE TO REQUEST FOR COMMENTS REGARDING THE COSTS
ASSOCIATED WITH, AND BENEFITS THAT WILL BE GAINED BY,
IMPLEMENTATION OF THE PROPOSED RULE AMENDMENTS**

Consistent with its filed comments on the Commission Staff’s Discussion Draft, OPUC believes that adoption of the proposed amendments would result in a consistent charge for exporting power from the ERCOT region throughout the year, enable ratepayers to pay a consistent export charge for each month of the year, and avoid potentially harmful price fluctuations.¹ OPUC believes that adoption of the proposed rule change will not adversely affect ratepayers, market participants, electric utilities, or system reliability. Therefore, OPUC believes that adoption of the proposed rule amendments is in the public interest and proposes no alternative language. OPUC is supportive of the proposed amendments to 16 TAC §25.192(e) and has no further comment at this time. If necessary, OPUC may file additional comments in reply to other parties’ comments.

¹ See OPUC’s Initial Comments on Commission Staff’s Discussion Draft (Mar. 3, 2022). See also OPUC’s Reply Comments on Commission Staff’s Discussion Draft (Mar. 14, 2022).

II. CONCLUSION

OPUC appreciates the opportunity to provide these initial comments on the Proposal for Publication and looks forward to working with Commission Staff and other stakeholders on this project.

Date: September 1, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

PUC Docket No. 53169

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 1st day of September 2022, by facsimile, electronic mail, and/or first class, U.S. Mail.


Justin Swearingen