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**Received - 2022-09-01 02:10:50 PM**  
**Control Number - 53169**  
**ItemNumber - 21**

**PROJECT NO. 53169**

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

**COMMENTS OF THE JOINT TRANSMISSION SERVICE PROVIDERS RELATED TO  
THE PROPOSAL FOR PUBLICATION OF AMENDMENTS TO 16 TAC § 25.192**

AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, Electric Transmission Texas, LLC, Oncor Electric Delivery Company LLC, and Texas-New Mexico Power Company (collectively, the “Joint TSPs”) timely file these comments related to the proposal for publication of amendments to 16 Texas Administrative Code § 25.192(e) filed by the Public Utility Commission of Texas (“Commission”) on August 4, 2022. The proposed amendments will eliminate the seasonal component of the transmission charge for exporting power outside the Electric Reliability Council of Texas (“ERCOT”) region by eliminating an increased charge for the months of June through September. In addition, the amendments clarify that the transmission rate will be the transmission service provider’s (“TSP”) annual rate converted to an hourly rate.

The Joint TSPs are unopposed to the proposed rule amendments and do not have comments on the proposed amendments themselves. Instead, the Joint TSPs note that if the proposed amendments are adopted, that TSPs serving the ERCOT region will need to file conforming compliance tariffs corresponding with the effective date of the rule. The Joint TSPs respectfully suggest that a single compliance project be opened for the submission of the compliance tariffs, which will enable the implementation of the TSP export rates in a timely, consistent, and efficient manner, unless a TSP chooses to file its conforming compliance tariff in an individual TCOS proceeding that is pending at the time that the Commission adopts the proposed amendments. The Joint TSPs appreciate the work of the Commission on this proposal for publication and further appreciate the Commission's consideration of these comments.

Respectfully submitted,

/s/ Leila Melhem

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