



## Filing Receipt

**Received - 2022-09-15 02:56:34 PM**  
**Control Number - 53169**  
**ItemNumber - 27**

**PROJECT NO. 53169**

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

**REPLY 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 reply comments in response to comments on the proposal for publication of amendments to 16 Texas Administrative Code § 25.192(e) filed by Grid United and Texas Industrial Energy Consumers (“TIEC”).

Grid United proposes to eliminate export fees outside of the peak months entirely.<sup>1</sup> The Commission should reject this proposal. Eliminating the export fee and the corresponding revenue credits for eight months of the year would result in ERCOT network transmission service (“NTS”) customers subsidizing the power marketers’ use of the transmission system during those months. Having no export fee would give power marketers free use of a transmission system built by and paid for by ERCOT customers to export power to customers outside of ERCOT. Such a proposal should be rejected.

TIEC recommends retaining a higher export rate for on-peak periods, but suggests that the Commission “more narrowly tailor the ‘on-peak’ period to the hours of 2-7 PM during weekdays in the summer months.”<sup>2</sup> The more narrowly tailored proposal, however, introduces unnecessary complexity and expense because it will require accounting to “drill down” into the daily totals for each weekday of the summer months to separate the megawatt-hours of export transactions between the 2-7 pm period from the export transactions outside of those hours. Because exports are charged on an hourly basis, higher market prices during the peak hours of the peak days may discourage exports during those hours, achieving a similar result to the one TIEC desires without imposing an additional burden. The Joint TSPs appreciate the Commission’s consideration of these reply comments.

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<sup>1</sup> Project No. 53169, Grid United’s Comments at 2 (Sep. 1, 2022).

<sup>2</sup> Project No. 53169, TIEC’s Comments at 2 (Sep. 1, 2022).

Respectfully submitted,

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