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PROJECT NO. 53169

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

**AEP TEXAS INC.'S COMMENTS
ON THE DISCUSSION DRAFT PROPOSING TO AMEND 16 TAC § 25.192(e)**

AEP Texas Inc. timely submits comments on the discussion draft filed by the Staff of the Public Utility Commission of Texas (“Commission”) on February 1, 2022. The discussion draft proposes to amend 16 Texas Administrative Code § 25.192(e). The amendment would 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. AEP Texas appreciates the work of the Commission on this discussion draft and further appreciates the opportunity to submit comments.

AEP Texas is unopposed to the changes proposed in the discussion draft. AEP Texas notes, however, that transmission service for exports of power from ERCOT is charged by megawatt-hour. For this reason, AEP Texas suggests that, for clarity, the Commission consider whether the language in subsection (e)(2) should reflect an hourly billing interval in lieu of a monthly interval. For example, the language could state:

The ~~monthly~~ hourly transmission rate will be ~~one-twelfth~~ the TSP’s annual rate divided by 8,760.

AEP Texas appreciates the Commission’s consideration of these comments.

Respectfully submitted,

/s/ Leila Melhem

Melissa Gage
State Bar No. 24063949
Leila Melhem
State Bar No. 24083492
AMERICAN ELECTRIC POWER SERVICE
CORPORATION
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3321
Facsimile: (512) 481-4591
Email: lmelhem@aep.com

ON BEHALF OF AEP TEXAS INC.