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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 COMMISSION STAFF'S DISCUSSION DRAFT**

The Office of Public Utility Counsel ("OPUC") respectfully submits these initial comments on the discussion draft proposing amendments to 16 Texas Administrative Code (TAC) § 25.192(e), relating to transmission rates for exporting power outside the ERCOT region. 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 discussion draft requests initial comments on the proposed amendments by March 3, 2022. These comments are timely filed.

OPUC recommends adoption of the proposed amendments to 16 TAC § 25.192(e) as set out in the discussion draft.

**I. RESPONSE TO REQUEST FOR COMMENTS ON THE EFFECTS THE
PROPOSED AMENDMENTS WOULD HAVE ON RATE PAYERS, MARKET
PARTICIPANTS, ELECTRIC UTILITIES, AND SYSTEM RELIABILITY**

OPUC believes that adoption of the proposed amendments would result in a consistent charge for exporting power from the ERCOT region throughout the year, which would enable ratepayers to pay a consistent export charge for each month of the year. 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 has no further comment at this point and is supportive of the proposed amendments to 16 TAC § 25.192(e).

II. CONCLUSION

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

Date: March 3, 2022

Respectfully submitted,

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