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| APPLICATION OF AEP TEXAS INC. | § | |
| FOR APPROVAL OF A WHOLESALE | § | PUBLIC UTILITY COMMISSION |
| DISTRIBUTION SERVICE | § | |
| DISTRIBUTED GENERATION | § | OF TEXAS |
| ENERGY STORAGE TARIFF | § | |

REQUEST FOR A HEARING

TO THE HONORABLE KATIE MOORE MARX, ADMINISTRATIVE LAW JUDGE:

COMES NOW Broad Reach Power LLC (“Broad Reach”) and timely¹ requests that this docket be referred to the State Office of Administrative Hearings (“SOAH”) for a hearing on the merits in this matter. Additionally, Broad Reach reserves its right to urge abatement of this proceeding in consideration of a forthcoming project that may impact the tariff requested in this case.² However, Broad Reach requests a hearing at this time to comply with Order No. 5.

¹ See Order No. 5 (Mar. 30, 2022).

² See *Review of Wholesale Electric Market Design*, Project No. 52373, Commissioner Glotfelty Memo re: Interconnection and Operational Issues Regarding Distribution Interconnected Battery Energy Storage Systems (Mar. 30, 2022).

Respectfully submitted,

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By: _____



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this pleading has been forwarded to all parties of record via electronic mail on the 25th day of April, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Alaina Zermeno
Alaina Zermeno