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

SMT MCALLEN LLC’S COMMENTS ON THE APPLICATION

TO THE HONORABLE KATIE MOORE MARX, ADMINISTRATIVE LAW JUDGE:

In compliance with Order No. 5, requiring intervenors either to request a hearing or submit comments by April 25, 2022, SMT McAllen LLC (“SMT McAllen”) submits these brief comments on the Application of AEP Texas Inc. for Approval of a Wholesale Distribution Service Distributed Generation Energy Storage Tariff (“Application”).

SMT McAllen urges the Commission to modify the requested Tariff in a manner more conducive to entry by battery energy storage (“BESS”) customers and any other resources that would have to pay costs under the proposed Tariff. The proposed rates far exceed the reasonable amount for the service being provided. They further grossly exceed the rates and collected revenues that other comparable utilities are charging for the same services, and adopting the proposed rates would set up the AEP area as a region where few, if any, BESS resources can deploy to the grid. As an example, Oncor Electric Delivery Company’s currently effective tariff for interconnection and ongoing wholesale distribution service charges rates that are far lower than AEP’s proposed rates as set forth in the Application. SMT McAllen therefore urges the Commission to modify the proposed Tariff in a manner reducing these charges to a level more consistent with those of other utilities, and that would better allow the developing BESS technology to grow within the ERCOT system.

SMT McAllen reserves the right to submit additional comments as this proceeding develops, including the right to submit evidence at any hearing on the merits.

Respectfully submitted,

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**ATTORNEYS FOR:
SMT MCALLEN LLC**

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