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

AEP TEXAS' RESPONSE TO HUNT ENERGY NETWORK, LLC'S MOTION TO ABATE PROCEEDING AND REQUEST FOR AGREED 60-DAY ABATEMENT

AEP Texas Inc. (AEP Texas) files this response to the Motion to Abate Proceeding filed by Hunt Energy Network, LLC (HEN). HEN filed its Motion on April 25, 2022 so this response is timely filed under 16 TAC § 22.78(a).

I. Agreed 60-Day Abatement

In response to HEN's Motion to Abate, AEP Texas and HEN have agreed to a 60-day abatement of this proceeding. AEP Texas and HEN also agree that at the end of the 60-day abatement period, the parties may agree to a further abatement and, absent such agreement, any party may file a motion requesting a further abatement of this proceeding. AEP Texas has shared this filing with the parties to this case and Broad Reach Power has indicated its agreement with the 60-day abatement.

AEP Texas respectfully requests that the Presiding Officer enter an order abating this proceeding for 60 days in accordance with the agreement between AEP Texas and HEN.

Respectfully submitted,

/s/ Kerry McGrath

Melissa Gage Kerry McGrath Leila Melhem Carey Olney Duggins Wren Mann & Romero, LLC **AEP Service Corporation** 400 W. 15th Street, Suite 1520 600 Congress Avenue, Suite 1900 Austin, Texas 78701 Austin, Texas 78701 (512) 481-3320 (512) 744-9300 (512) 744-9399 (512) 481-4591 AEPAUSTINTX@aep.com kmcgrath@dwmrlaw.com colney@dwmrlaw.com

ATTORNEYS FOR AEP TEXAS INC.

Certificate of Service

| I here | by certify that | on this 2 nd | day of May, | 2022, a | true and | correct co | py of the | foregoing |
|--------------|-------------------|-------------------------|--------------|---------|-----------|------------|------------|-----------|
| document wa | as transmitted to | the parties | of record in | accorda | ince with | the Secon | d Order Su | ispending |
| Rules issued | in Project No. | 50664. | | | | | | |

/s/ Kerry McGrath