



## Filing Receipt

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**DOCKET NO. 53267**

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

**COMMISSION STAFF’S PROPOSED LIST OF ISSUES**

On February 24, 2022, AEP Texas Inc. (AEP Texas) filed an application for approval of a Wholesale Distribution Service Distributed Generation Energy Storage Tariff pursuant to 16 TAC §25.191.

On July 13, 2022, the Public Utility Commission of Texas (Commission) issued an order requesting a list of issues, requiring AEP Texas to file, and allowing Commission Staff (Staff) and other parties to file by July 27, 2022. Therefore, this pleading is timely filed.

**I. PROPOSED LIST OF ISSUES**

Staff has identified the following issues to be addressed in this docket:

1. Did AEP Texas provide notice of the application in accordance with 16 Texas Administrative Code (TAC) § 22.55?
2. Has AEP Texas received a valid interconnection request to provide wholesale transmission service at distribution voltage to a wholesale consumer under 16 TAC § 25.191(d)(2)(C)?
3. Does AEP Texas provide wholesale transmission service at distribution voltage itself? If so,
  - a. Please explain the details and circumstances of that service.
  - b. Does AEP Texas’ proposed tariff provide wholesale transmissions service at rates and terms, including terms of access, that are comparable to the rates and terms of AEP Texas’ own use of its system? Public Utility Regulatory Act (PURA) § 35.004(a); 16 TAC § 25.191(d)(2).
4. Does AEP Texas’ proposed tariff provide nondiscriminatory access to wholesale transmission service at distribution voltage for qualifying facilities, exempt wholesale generators power marketers, power generation companies, retail electric providers, and other electric utilities or transmission and distribution utilities? PURA § 35.004.

5. Under the proposed tariff, will AEP Texas recover its reasonable costs in providing wholesale transmission service at distribution voltage necessary for the transaction from the entity for which wheeling service is provided so that no other customer of AEP Texas bears the costs of the service? PURA § 35.004(c).
6. Are the rates in AEP Texas' proposed tariff appropriate?

## **II. ISSUES NOT TO BE ADDRESSED**

Staff has not identified any issues not to be addressed in this proceeding.

## **III. CONCLUSION**

Staff respectfully requests that its list of threshold issues be among the issues considered by the Commission in this proceeding.

Dated: July 27, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on July 27, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Ian Groetsch  
Ian Groetsch