



## 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>	<b>§</b>	

**HUNT ENERGY NETWORK L.L.C. AND BROAD REACH POWER, LLC’S  
PROPOSED LIST OF ISSUES**

In accordance with Public Utility Commission of Texas (“Commission”) Order Requesting Lists of Issues,<sup>1</sup> Hunt Energy Network L.L.C. (“HEN”) and Broad Reach Power, LLC (“Broad Reach”) hereby file their joint Proposed List of Issues.

**I. INTRODUCTION**

HEN and Broad Reach file this pleading based solely on a preliminary analysis of the Wholesale Distribution Service Distributed Generation Energy Storage Tariff application filed by AEP Texas Inc. (“AEP Texas”).<sup>2</sup> HEN and Broad Reach hereby reserve the right under the Administrative Procedure Act<sup>3</sup> to submit evidence and argument on each and every issue raised by AEP Texas or any other party to this proceeding, regardless of whether the issue is identified herein.

**II. PROPOSED LIST OF ISSUES**

The following issues are appropriate for inclusion in a Preliminary Order in this proceeding:

1. Do the proposed rates comport with the wholesale storage provisions in 16 Texas Administrative Code (“TAC”) § 25.501(m), which ensure wholesale storage is not subject to retail tariffs, rates, and charges of fees assessed in conjunction with the retail purchase of electricity?

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<sup>1</sup> Order Requesting Lists of Issues (Jul. 13, 2022).

<sup>2</sup> Application of AEP Texas Inc. for Approval of a Wholesale Distribution Service Distributed Generation Energy Storage Tariff (Feb. 24, 2022).

<sup>3</sup> Admin. Procedure Act (“APA”), Tex. Gov’t Code §§ 2001.051 et seq.

2. Does PURA<sup>4</sup> §35.004(c) authorize AEP Texas to charge energy storage resources interconnected at distribution voltage for wholesale transmission service?
3. Does the proposed tariff provide nondiscriminatory access to wholesale transmission service for power generation companies in accordance with PURA § 35.004(b).
4. Do the proposed rates charged to battery energy storage resources interconnected at distribution voltage result in discriminatory treatment as compared to battery energy storage resources interconnected at transmission voltage in AEP Texas's service territory?
5. Do the proposed rates comport with PURA § 35.152?
6. Do the proposed rates comport with the tariff requirements in 16 TAC §§ 25.191 and 25.192?
7. Will the proposed rates negatively impact ratepayers?
8. Will the proposed rates negatively impact the development of additional energy storage resources in the ERCOT region?
9. What are the costs to the distribution system caused by energy storage resources interconnected at distribution voltage?
10. What are the benefits to the distribution system provided by energy storage resources interconnected at distribution voltage? Should these benefits be reflected in the rate design?
11. What is a reasonable and necessary cost estimate for AEP Texas to provide wholesale distribution service to energy storage resources interconnected at distribution voltage?
12. Should the proposed tariff be designed to reflect the different costs associated with providing wholesale distribution service to an energy storage resource located adjacent to an AEP Texas substation?
13. Has AEP Texas supported its proposed rate with a proper cost study demonstrating allocated costs of service for the proposed service?
14. Are the proposed rates just and reasonable in accordance with PURA and Commission rules?
15. Is the proposed tariff in the public interest?

### **III. CONCLUSION AND PRAYER**

HEN and Broad Reach respectfully request that the Commission include the issues listed above in the Preliminary Order to be issued in this docket.

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<sup>4</sup> Public Utility Regulatory Act ("PURA"), Tex. Util. Code §§ 11.001-66.016.

Respectfully Submitted,

/s/ Stephanie Kroger  
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July 27, 2022

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document has been forwarded to all parties of record in this proceeding via electronic mail on this 27<sup>th</sup> day of July, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Stephanie Kroger  
Stephanie Kroger