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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 | § | |

AGREED MOTION TO ABATE PROCEEDING

AEP Texas, Inc., Hunt Energy Network, L.L.C., Broad Reach Power LLC, and SMT McAllen LLC file this Agreed Motion to Abate Proceeding. Commission Staff has indicated that it is unopposed to this Motion.

I. Motion to Abate

This proceeding is AEP Texas’ application for approval of a new Wholesale Distribution Service Distributed Generation Energy Storage Tariff and related relief. The Commission has recently opened a project to consider cost recovery for service to distributed energy resources (DERs) and Commission Staff has posted questions for comment.¹ Staff’s questions are similar to and grew out of questions presented by Commissioners McAdams and Glotfelty, who are leading a project to evaluate issues related to DERs and contemplate enacting rules addressing such issues, including cost recovery.² The issues in the pending Commission DERs projects overlap with AEP Texas’ requested relief in this proceeding. In light of the pending projects and contemplated rulemaking relating to the issues in AEP Texas’ application in this case, the parties have concluded that it would be more efficient to abate this proceeding at this time.

The parties respectfully request that the Administrative Law Judges abate the procedural schedule in this case as overlapping issues are being considered by the Commission in the pending DERs projects. The abatement may be lifted on motion of any party that concludes this proceeding should move ahead to address AEP Texas’ application. The parties agree that if the abatement is

¹ *Cost Recovery for Service to Distributed Energy Resources (DERs)*, Project No. 54224, Questions for Comment (Oct. 24, 2022).

² *Review of Distributed Energy Resources*, Project No. 51603, Memorandum of Commissioners McAdams and Glotfelty (Oct. 5, 2022).

lifted and a new procedural schedule is established, the new schedule should preserve the timing of the existing schedule with respect to discovery, testimony, and other deadlines.

Respectfully submitted,

/s/ Kerry McGrath

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**ATTORNEYS FOR
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AND SMT MCALLEN LLC**

Certificate of Service

I certify that on this 27th day of October, 2022, a true and correct copy of the foregoing document was transmitted to the parties of record in accordance with the Second Order Suspending Rules issued in Project No. 50664.

/s/ Kerry McGrath