



## Filing Receipt

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**DOCKET NO. 53267**

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

**HUNT ENERGY NETWORK L.L.C.'S MOTION TO INTERVENE**

Hunt Energy Network L.L.C. ("HEN") moves to intervene in the above-styled proceeding pursuant to 16 Tex. Admin. Code §§ 22.101, 22.103(b) and 22.104. HEN would show as follows:

1. The names, address, and telephone number of HEN's authorized representatives are:

Pat Wood, III  
Hunt Energy Network L.L.C.  
Chief Executive Officer  
1900 North Akard Street  
Dallas, Texas 75201  
Phone: (713) 454-9592  
[pwood@huntenergynetwork.com](mailto:pwood@huntenergynetwork.com)

Curtis Riddle  
Hunt Energy Network L.L.C.  
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1900 North Akard Street  
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All pleadings and other documents should be served upon HEN's authorized representatives.

2. On February 24, 2022, AEP Texas Inc. ("AEP") filed an application for approval of a new Wholesale Distribution Service Distributed Generation ("WDS DG") Energy Storage Tariff to establish rates and other terms and conditions for distributed generation energy storage facilities that take wholesale service at distribution voltage from AEP Texas.

3. HEN currently has 100 megawatts (“MW”) of distributed battery energy storage systems (“BESS”) in advanced stages of development throughout Texas targeting operation by second quarter 2022. In addition, HEN has two BESS facilities in operation that are interconnected at the distribution level, one of which is in AEP’s service area. HEN is directly impacted by decisions made in this docket.

For the above stated reasons, HEN respectfully requests that the Commission grant this Motion to Intervene and admit HEN as an intervenor in this proceeding, and for such other relief to which it may be justly entitled.

Respectfully submitted,



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**ATTORNEY FOR:**

**HUNT ENERGY NETWORK L.L.C.**

**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 1<sup>st</sup> day of March, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



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Curtis Riddle