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DOCKET NO. 53267

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

BROAD REACH POWER, LLC’S MOTION TO INTERVENE

Broad Reach Power LLC (“Broad Reach”) moves to intervene in the above-styled proceeding pursuant to 16 Tex. Admin. Code §§ 22.101, 22.103(b), and 22.104. Broad Reach would show as follows:

1. The names, address, and telephone number of Broad Reach’s authorized representatives are:

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All pleadings and other documents should be served upon Broad Reach’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.

3. Broad Reach currently has four battery energy storage systems (“BESS”) in operation at the distribution level in AEP’s service area, each with a capacity of 9.95 megawatts (“MW”). These facilities are interconnected to AEP and receive wholesale transmission service at distribution voltage and would be assessed charges under the proposed Tariff. Broad Reach is therefore directly affected by the application filed, and the decisions made, in this docket.¹

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

¹ Application of AEP Texas Inc. for Approval of a Wholesale Distribution Service Distributed Generation Energy Storage Tariff at 1 (Feb. 24, 2022) (“...the entities taking wholesale distribution DG service from or who are in discussions with AEP Texas are directly affected by the filing of this Application.”).

Respectfully submitted,

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By: /s/ Alaina Zermeno

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**ATTORNEYS FOR:
BROAD REACH POWER LLC**

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 7th day of March 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Alaina Zermeno
Alaina Zermeno