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PUBLIC UTILITY COMMISSION OF TEXAS PROJECT NO. 53911

AGGREGATED DISTRIBUTED ENERGY RESOURCES (ADER) ERCOT PILOT PROJECT

NEP COMNENTS ON REQUESTED TASK FORCE WORKSHOPS

NEP agrees that barriers exist for multifamily properties participating in the ADER pilot, and that these barriers should be addressed in a series of ADER Task Force workshops. At the outset of the ADER effort, NEP, in conjunction with technology partner Armada Power, filed comments on August 18, 2022, identifying related issues and barriers that the pilot program should address and ultimately help resolve. These issues and topics remain ripe for full stakeholder workshop discussions and pilot program testing.

One issue previously identified is to allow customers to use a load serving entity (LSE) for the ADER program but not be restricted to use the same LSE/REP (Retail Electric Provider) for their generation supply. This helps avoid situations whereby customers must choose between a great supply product and participation in the ADER pilot program. Having customer flexibility will spur broader ADER participation and ensure reliable ADER megawatts are available to ERCOT without concern of customer disenrollment due to contracts ending with their REP.

NEP looks forward to participating in any scheduled workshops to fully examine barriers to ADER participation and improvements to the ADER pilot program for the betterment of Texas.

Respectfully submitted.

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