

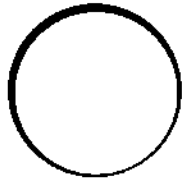


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sonnen

August 29, 2024

Commissioner James Glotfelty
Public Utility Commission of Texas
1701 N. Congress, Suite 7-110
Austin, Texas 78701

Re: Notice of Participation Interest in ADER Task Force Membership of Sonnen, Inc.

Dear Commissioner Glotfelty and Task Force Leadership,

In response to Commissioner Glotfelty's memo filed in this proceeding,¹ Sonnen, Inc. US ("Sonnen") respectfully requests a seat on the ADER Task Force. Sonnen will provide guidance as an Original Equipment Manufacturer ("OEM") with battery manufacturing, as well as VPP software suite and customer program experience in U.S. and global markets with various designs: vertically integrated utilities, competitive deregulated markets, and hybrid models. The current ADER Task Force roster has only two companies that are ADER device hardware OEMs (Tesla and Generac).² We thus appreciate greatly the memo highlighting the need for a refresh and expansion of the knowledge base in the Task Force. The Task Force should include more entities like our company, which have experience with manufacturing standards, implementation of IEEE and UL standards, and product APIs.

Importantly, Texas is not a singular marketplace: non-opt-in entities and retail competition areas have distinct and unique needs, and batteries are being built by companies like ours to fulfill diverse needs in Texas. It is our company mission to ensure that VPP/ADER can be commonplace nationwide.

Sonnen provided a technical overview to the ADER Task Force and the public in its presentation of August 2022.³ Sonnen noted at that time that it intends to deliver VPP services in Texas through a retail energy partnership. This is an example of how VPP Providers in Texas can deliver VPP services through load-serving entities and addresses the concern expressed in the memo that the "Task force should look at if it is possible for a consumer to select a VPP provider that is not their Retail Electric Provider." It is absolutely possible. Sonnen looks forward to sharing

¹ Memorandum filed by Commissioner James Glotfelty in Project No. 53911 – August 14, 2024. https://interchange.puc.texas.gov/Documents/53911_81_1419425.PDF.

² ADER Revised Roster filing, CenterPoint Energy (04/01/24): https://interchange.puc.texas.gov/Documents/53911_73_1379891.PDF.

³ See VPP Experiences Workshop materials, Sonnen Presentation: [53911_11_1235502.PDF](https://interchange.puc.texas.gov/Documents/53911_11_1235502.PDF) (texas.gov).

its ERCOT Pilot progress recommendations which will make this model easier to deliver for ADER participation in Texas.⁴

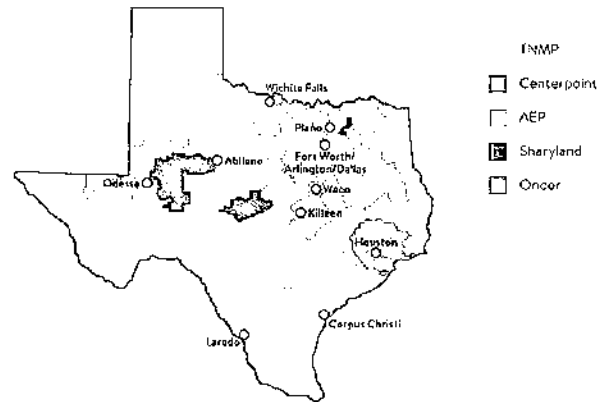
Imminent Sonnen VPP project in Texas.

Partnering with REP to optimize value of battery swarm.

Phase 1: December 2022 – December 2025 ≈ 5,000 VPP Nodes

Phase 2: January 2026 – December 2027 ≈ 7,500 VPP Nodes

- Provides resiliency with full battery capacity when increment weather is expected
- Otherwise, REP to have full control of each battery system
- Installing solar and storage in apartments & single-family homes
- Includes several low-to-medium income apartment communities
- Offers discounted clean energy, carbon neutral living and energy security



Source: VPP Experiences Presentation of Sonnen, Inc. – US:⁵

It is an exciting time for Texas. We look forward to sharing our expertise in this matter. We would be honored to join the ADER Task Force and achieve the shared objectives of Sonnen, the ADER Task Force and the Commission.

Blake Richetta

Blake Richetta
Chairman and CEO
Sonnen, Inc. – Americas

⁴ Sonnen, Inc. plans to file initial recommendations for simplifying a VPP Provider – Retail Provider approach to invite more ADER participation from residential dispatchable systems.

⁵ See VPP Experiences Workshop materials, Sonnen Presentation at page 13: [53911_11_1235502.PDF \(texas.gov\)](#). At this meeting, Sonnen explained that the company builds and deploys its own VPP Software which interfaces with Sonnen devices – including Battery Energy Storage systems for residential, behind-the-meter applications. Sonnen can interface its VPP fleet devices to load-serving entities to deliver VPP services.