



## **Filing Receipt**

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**REPLY COMMENTS OF TRINITY RIVER  
COMMUNITY SOLAR SYSTEMS INC ON  
STANDARDIZED DISTRIBUTION  
CONNECTION ALLOWANCE**

Trinity River Community Solar Systems Inc (TRCSS) appreciates the opportunity to respond to the request for reply comments issued by the Public Utility Commission of Texas (PUCT) in filing 32 dated 9/9/2024, “Questions Concerning Standardized Distribution Interconnection Allowance for Comment.” These comments are submitted on behalf of TRCSS and reflect the opinions of its members.

TRCSS, a 501(c)3 organization, is a Texas based start-up nonprofit organization focused on developing community based DERs addressing energy issues in underserved communities.

TRCSS is responding in order to focus on the opportunity that standardizing distribution connection allowances presents to provide a fair approach to the cost recovery issue for “Community Solar + Storage” systems. “Community Solar” remains to be defined in Texas, but generally includes solar PV systems interconnected at the Distribution level, ranging in size from about 50 kW to less than 10 MW “nameplate” DC, with some connection to a geographically defined community, and some component supporting disadvantaged communities. TRCSS’ approach includes battery storage in order to provide resiliency, better integration with distribution grids, and financial viability.

Cost recovery in ERCOT deregulated areas is complicated compared to vertically integrated utility regulatory structures because distribution utilities have a limited capacity to recover lost revenue due to decreased volumetric revenue without increasing fixed costs.

While it is appropriate to consider Community Solar in considering the proposed standardized distribution connection allowance, it should be recognized that cost recovery will also need to be considered in rate design where issues pertaining to Retail Electric Providers can be considered (which is outside the scope of the questions under consideration here).

Texas residential, commercial, and industrial electric customers have an increasing interest in Distributed Energy Resources (DERs) including Distributed Energy Storage Resources (DESRs), and Community Solar provides a way for customers who are not otherwise able to participate.

**RESPONSE TO COMMENTS**

**For TRCSS’ Responses see the Executive Summary at the end of this document**

## CONCLUSION

TRCSS appreciates the opportunity to provide these Reply Comments and looks forward to working with PUCT Commissioners, Staff, and other stakeholders on these rules and their implications.

Respectfully,

  
James D. Orenstein

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**EXECUTIVE SUMMARY OF TRCSS'S RESPONSE TXSES COMMENTS**  
**Case 54233-32**

- **Reply to TXSES.** TXSES proposed (filing #55) that small DG interconnections, 50 kW or less, should be covered under a marginal interconnection allowance standard of no greater than \$300.00. TRCSS supports this for the reasons given.

50 kW is an appropriate size because it also appears in proposed updates to DER Technical Requirements and Interconnection Processes for DERS in PUCT docket 54233.

- **Reply to TSPA and SEIA.** TSPA and SEIA proposed (filing #51) detailed responses to Q5 & Q6. TRCSS supports these for the reasons given.
- **Reply to Base Power.** Base Power proposed (filing #49) detailed responses to Q1, Q2, Q3, Q4, Q7, & Q8. TRCSS supports these for the reasons given except that TRCSS supports a lower tier limit of 50 kW to align with TXSES' proposal and docket 54233.
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