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PROJECT NO. 54233

TECHNICAL REQUIREMENTS AND	§	PUBLIC UTILITY COMMISSION
INTERCONNECTION PROCESSES	§	
FOR DISTRIBUTED ENERGY	§	OF TEXAS
RESOURCES (DERS)	§	

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S COMMENTS ON
COMMISSION STAFF'S DISCUSSION DRAFT OF NEW 16 TAC § 25.210,
AMENDMENTS TO § 25.211 AND REPEAL AND REPLACEMENT OF § 25.212**

Electric Reliability Council of Texas, Inc. (ERCOT) respectfully submits these comments in response to the Public Utility Commission of Texas (Commission) Staff's draft discussion that proposes new Texas Administrative Code (TAC) § 25.210, amendments to 16 TAC § 25.211, the repeal of existing 16 TAC § 25.212, and new 16 TAC § 25.212. The deadline to file comments is June 27, 2025. Accordingly, these comments are timely filed. An executive summary is attached at the end of this filing.

I. COMMENT ON 16 TAC § 25.210

ERCOT offers the following comment on 16 TAC § 25.210:

1. Replace the word “electronically” with “electrically” in Subsection (b)(10).

ERCOT recommends replacing the word “electronically” with “electrically” in the definition of “Network” found in 16 TAC § 25.210(b)(10). ERCOT believes this change would establish a definition for “Network” that is more factually accurate. This change would ensure consistency with similar definitions found throughout 16 TAC Chapter 25.¹

Proposed Change:

- (10) **Network** -- Consists of two or more primary distribution feeder sources electrically tied together on the DSP's secondary (or low voltage) side to form one power source for one or more customers.

II. COMMENTS ON 16 TAC § 25.212

ERCOT offers the following comments on 16 TAC § 25.212:

¹ See 16 TAC § 25.211(c)(9).

2. All Distributed Energy Resource capacity references should include “nameplate capacity.”

For clarity and consistency, ERCOT recommends all references to Distributed Energy Resource (DER) capacity, including the references located in 16 TAC §§ 25.212(b)(6), 25.212(c)(2), 25.212(c)(3)(A)(i), and 25.212(d)(3), include a reference to “nameplate capacity.” When referring to the capacity of a DER, including the phrase “nameplate capacity” will avoid confusion in determining the relevant megawatt capacity threshold for a DER under this rule.

3. Amend the language in Subsection (c)(3)(A)(i).

ERCOT recommends amending the language in subsection (c)(3)(A)(i) to clarify that the rules ERCOT must establish and maintain regarding DERs is not limited to the subject matter established in paragraph (2) of subsection (c). ERCOT is concerned that the existing language could lead to a potential interpretation that would limit ERCOT’s ability to establish requirements for DERs to the scope described in paragraph (2) of subsection (c).

Proposed change:

- (3) **Alternative frequency and voltage.** DERs with a nameplate capacity of over one MW or that are registered with ERCOT may be subject to alternative frequency and voltage standards than those under paragraph (2) of this subsection.

(A) **ERCOT.**

- (i) ERCOT must establish and maintain rules for technical and operational requirements of DERs that have a nameplate capacity over one MW and for DERs registered with ERCOT that are interconnected in the ERCOT region. The rules must at a minimum cover the same subject matter established in paragraph (2) of this subsection.

III. COMMENTS ON SPECIFIC DISCUSSION ISSUES

1. ERCOT supports the Commission implementing the Institute of Electrical and Electronics Engineers (IEEE) standards in its DER requirements because IEEE standards drive available technology and technical support. The implementation of IEEE standards would also provide a framework for ensuring consistent performance of DERs across the ERCOT system.
2. ERCOT recommends § 25.210 apply to all Distribution Service Providers (DSPs), including municipally-owned utilities (MOUs) and electric cooperatives. ERCOT believes that there should be consistent application of technical requirements for DERs that exist within the ERCOT region because it will lead to more efficient installation and consistent performance of DERs. Having the same technical requirements for DERs across Texas, regardless of whether a DER is located in an MOU's or electric cooperative's service area, will create a more efficient and reliable system, therefore supporting overall system performance.

IV. CONCLUSION

ERCOT appreciates the Commission's consideration of these comments and would be pleased to provide any additional information that may be needed.

Respectfully Submitted,

/s/ Sidne E. Finke

Chad V. Seely
Senior Vice President, Regulatory Policy;
General Counsel; and Chief Compliance Officer
Texas Bar No. 24037466
(512) 225-7035 (Phone)
chad.seely@ercot.com

Nathan Bigbee
Chief Regulatory Counsel
Texas Bar No. 24036224
512-225-7093 (Phone)
nathan.bigbee@ercot.com

Douglas Fohn
Assistant General Counsel
Texas Bar No. 24036578
(512) 275-7447 (Phone)
douglas.fohn@ercot.com

Sidne E. Finke
Associate Corporate Counsel
Texas Bar No. 24131870
(512) 225-7036 (Phone)
sidne.finke@ercot.com

8000 Metropolis Drive, Bldg. E, Suite 100
Austin, Texas 78744
(512) 225-7079 (Fax)

ATTORNEYS FOR ELECTRIC
RELIABILITY COUNCIL OF TEXAS, INC.

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EXECUTIVE SUMMARY OF
ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.'S COMMENTS

Electric Reliability Council of Texas, Inc. (ERCOT) recommends the following revisions to the Public Utility Commission of Texas's (Commission's) draft discussion that proposes new Texas Administrative Code (TAC) § 25.210, amendments to 16 TAC § 25.211, the repeal of existing 16 TAC § 25.212, and new 16 TAC § 25.212:

- Replace the word “electronically” with “electrically” in the definition of “Network” found in 16 TAC § 25.210(b)(10).
- For clarity and consistency, ERCOT recommends all references to Distributed Energy Resource (DER) capacity, including the references located in 16 TAC §§ 25.212(b)(6), 25.212(c)(2), 25.212(c)(3)(A)(i), and 25.212(d)(3), include a reference to “nameplate capacity.”
- Amend the language in subsection (c)(3)(A)(i) to clarify that the rules ERCOT must establish and maintain regarding DERs is not limited to the subject matter established in paragraph (2) of subsection (c).