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Project No. 54233

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

INITIAL COMMENTS OF THE HOUSTON ADVANCED RESEARCH CENTER ON DISCUSSION DRAFT AND ASSOCIATED FORMS FOR DER INTERCONNECTION RULES

The Houston Advanced Research Center (HARC) respectfully submits these comments in response to the Commission Staff's Request for Comments on Discussion Draft and Associated Forms for DER Interconnection Rules (§§25.210-25.212) under Project 54233.

Our mission includes enabling equitable access to clean energy across Texas, with a focus on deploying residential distributed solar and storage in underserved and low-income communities statewide. Low-income households in Texas face some of the highest energy burdens in the country. Rooftop solar, when paired with fair policies and interconnection rules, can reduce monthly utility bills, improve community resilience, and unlock localized economic opportunity. However, residential projects are highly sensitive to cost, excessive delays or technical complexity which can be fatal to a project.

We support the Commission's leadership in updating DER interconnection rules. These updates are timely and essential. However, the current draft may create disproportionate burdens for residential solar deployments by introducing technical, financial, or procedural requirements that exceed what is reasonably necessary for safe interconnection.

Recommendation: Create a Fast Track Interconnection Process for Residential Systems

The current §25.211 *Interconnection of Distributed Energy Resources (DERs) with a Nameplate Capacity of 250kW or Less for Parallel Operation* lacks a classification that would allow small residential DERs, like rooftop solar, to bypass unnecessary reviews, studies, or fees. As written, the rule applies the same interconnection requirements to a 5 kW rooftop solar system as to a 250 kW commercial project which may result in unnecessary delays, studies, and costs that can deter residential adoption. Projects using UL-certified equipment and inverter controls pose minimal grid risk, and their inclusion in the existing interconnection process for systems < 250kW adds cost, time, and burden incongruent with their system impact.

We support creating a separate, streamlined and no cost interconnection process for residential DERs with aggregate nameplate capacity less than or equal to 50 kW and a maximum export capacity not exceeding 25 kW at a single point of interconnection. If Commission Staff create a

fast-track interconnection for DERs with a nameplate capacity of 50kw or less for parallel operation, the following provisions should be included:

- Systems under this section shall be eligible for the fast-track interconnection process and a complete application for the system shall be reviewed and approved within 2 weeks of receipt. Interconnection of systems under this section should preempt interconnection of larger DERs.
- The Distribution Service Provider (DSP) shall not require a pre-interconnection study, contribution-in-aid-of-construction (CIAC), or application fee for any system under this section that is using certified equipment and operating within export screen limits.
- The DSP shall not require upgrades, relay testing, or network impact studies for a system under this section unless cumulative export exceeds 25% of feeder peak load or unless documented reliability risks are present.

By adjusting the rule to create a streamlined process for residential DERs, the Commission can continue to support energy affordability, energy security and choice, and local resilience in Texas communities that need them most.

Conclusion

HARC appreciates the Commission Staff's consideration of these comments and their continued commitment to Project 54233.

Respectfully submitted,

/s/ Micalah Spenrath, PMP
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HARC

Project No. 54233

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

EXECUTIVE SUMMARY

INITIAL COMMENTS OF THE HOUSTON ADVANCED RESEARCH CENTER ON DISCUSSION DRAFT AND ASSOCIATED FORMS FOR DER INTERCONNECTION RULES

The Houston Advanced Research Center (HARC) respectfully submits these comments in response to the Commission Staff's Request for Comments on Discussion Draft and Associated Forms for DER Interconnection Rules (§§25.210-25.212) under Project 54233.

We commend the Commission's leadership in modernizing DER rules. However, the current draft of §25.211 does not adequately differentiate between large, higher impact DERs and low-impact residential systems. As written, the rule applies the same interconnection requirements to a 5 kW rooftop solar system as to a 250 kW commercial project which may result in unnecessary delays, studies, and costs that can deter residential adoption, especially in energy burdened communities.

To address this, we recommend the creation of a distinct category for small residential DERs, defined as systems with nameplate capacity ≤ 50 kW and export ≤ 25 kW, and the establishment of a fast-track, no-cost interconnection process for such systems. Key provisions should include:

- Two-week application processing for certified systems and priority interconnection over larger DERs.
- No study, CIAC, or application fees where export is under 25% of feeder peak load.
- Exemption from upgrades or detailed studies unless specific, documented reliability risks exist.

Adopting this streamlined pathway will ensure the rule supports expanding access to reliable, distributed generation; reducing energy burdens; and improving local grid resilience in underserved communities.

Conclusion

HARC appreciates the Commission Staff's consideration of these comments and their continued commitment to Project 54233.

Respectfully submitted,

/s/ Micalah Spenrath, PMP
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