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PROJECT NO. 54233

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

REPLY COMMENTS OF ENPHASE ENERGY AND TESLA ON STAFF DISCUSSION DRAFT DOCUMENTS

I. Introduction

Enphase Energy, Inc. (Enphase) and Tesla, Inc. (Tesla) (Joint Original Equipment Manufacturers [OEMs]) appreciate the opportunity to submit these reply comments that provide feedback on the perspectives shared in opening comments by various stakeholders on June 27, 2025. In these reply comments, the Joint OEMs address the following:

- Oncor mischaracterizes the benefits that Meter Socket Adapters (MSAs) provide and raises operational concerns that, having been addressed in other jurisdictions, can be readily addressed with Texas utilities.

II. Oncor mischaracterizes the benefits that MSAs provide and raises operational concerns that, having been addressed in other jurisdictions, can readily be addressed with Texas utilities.

In its comments, Oncor suggests that entities advocating for the use of MSAs are primarily motivated to save time in DER installations by avoiding the review and scrutiny of local Authorities Having Jurisdiction (AHJs) in the course of permitting inspections. Specifically, Oncor states that, "Meter collars have been described as innovative because they reduce the installation time of a DER by being placed between the utility meter and meter base. This position, however, relies on the presumption that installing

these devices in this space reserved for utility use only would avoid city or local jurisdictional electrical permitting and inspection requirements."

This is not only a misunderstanding of the benefits that MSAs provide, but it also mischaracterizes the primary rationale that stakeholders typically present when advocating for authorization to deploy MSAs in the customer's meter socket, both in general and in the context of this proceeding. As an initial matter, the Joint OEMs are unaware of any jurisdictional permitting framework that removes the requirement to undergo applicable reviews and inspections to obtain a permit, solely based on the presence of an MSA in a DER installation. Further, the Joint OEMs are unaware of any effort to establish such a framework in any local jurisdiction in the US.

That said, the use of MSAs *will* typically help streamline any required review of projects pursuant to permitting requirements, insofar as their use simplifies DER deployment by significantly reducing complex rewiring work that, for many customers, would otherwise be required for a whole or partial home backup configuration. However, any such reduction in permitting review timelines is secondary to the more fundamental benefit that MSAs provide in terms of reducing DER installation timelines.[1] It is unclear where Oncor derived its assertion that the reduction in installation time associated with MSAs is primarily attributable to avoiding scrutiny from local permitting authorities, given that the basis for this argument and characterization is not attributed or sourced.

[1] See "Backup Switch Installation" video at https://www.tesla.com/support/energy/powerwall/learn/tesla-backup-switch. In this video Tesla provides a comparison of the installation of a typical storage installation for whole home backup when Tesla's Backup Switch can be used versus an installation where the Backup Switch is not used.

In addition to Oncor's dubious claims that discount the direct, tangible benefits of MSAs in reducing the complexity of DER deployments, Oncor also raises concerns regarding the "[introduction of] customer owned equipment into the utilities' physical space"[2] and the "ambiguity and confusion"[3] this creates regarding who is responsible for which discreet piece of equipment. The Joint OEMs submit that this situation is not meaningfully different from what otherwise exists today with respect to meter sockets. This piece of equipment, into which the utility meter is inserted, is owned by the customer, who is thus also responsible for its maintenance. An MSA can be reasonably viewed as an extension of the meter socket that carries with it the same customer-facing responsibility that applies to the meter socket itself. This is not the ambiguous or intractable issue that the utility claims it to be.

For instance, Oncor goes on to say this issue is particularly concerning in emergency situations as it will be unclear who is authorized to remove the MSA. This issue can be easily resolved as part of determining roles, responsibilities, and processes for MSA installations, including contingencies wherein MSAs may need to be removed for safety or reliability reasons. E.g., if MSA are authorized for use, it would be reasonable to stipulate, in the interconnection agreement or other comparable governing agreement, that the utility may remove the MSA as deemed necessary by utility personnel in the case of an emergency, regardless of whether utility personnel or non-utility personnel (e.g., the customer's DER contractor) are ultimately authorized to install MSAs. Additionally, to the degree that MSA installations are allowed to be

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[2] Oncor Electric Delivery Company LLC's Initial Comments on Staff's May 14, 2025 Discussion Draft of New 16 Tac §25.210, Amendments To §25.211, and Repeal and Replacement of §25.212; pg. 3
[3] *Ibid.*

performed by non-utility personnel, the Joint OEMs would further stipulate that, if the utility removes an MSA, due to emergency circumstances or otherwise, the adopted requirements that govern MSA installations in that utility's service territory should define the criteria for reinstalling the MSA and identify the entity (or entities) that are authorized to perform such work.

At a higher level, the Joint OEMs agree that allowing MSAs would necessarily require development of additional training and operational procedures to ensure utility personnel are familiar with the devices and know how to handle them in the field. However, these are readily resolvable issues, as demonstrated by the successful and increasingly widespread use of this technology across a growing number of utility territories, both in Texas and across the country.

III. Conclusion

The Joint OEMs appreciate the opportunity to submit these reply comments.

Respectfully submitted,

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