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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 CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC

CenterPoint Energy Houston Electric, LLC ("**CenterPoint Energy**" or the "**Company**") submits these reply comments pursuant to the Commission Staff's request for comments filed on May 14, 2025. The chart below highlights the Company's responses to certain recommendations made in the parties' June 27, 2025, initial comments.

Commenter	Recommendation	CenterPoint Energy Response
Base Power GRIT TAEBA Enphase and Tesla TSSA TXSES	Recommend a separate, more streamlined rule and interconnection process for small commercial and residential DERs less than 50 kW	The Company agrees that a more streamlined process should be developed for DERs less than 50 kW. The Company looks forward to working with the parties to develop a streamlined process for interconnecting DERs < 50 kW.
GRIT	Recommends that the protective function requirements in 25.212(g)(2)(C) for DER communication-based telemetry and transfer trip equipment apply "to the extent that the DSP has pre-installed" the necessary equipment on its side of the POI to facilitate communication-based telemetry and transfer trip	The Company opposes this recommendation. The necessity for transfer trip equipment should be based on the DSP's operating requirements
GRIT	Recommends revising the definition of "parallel operation" to state, "The Operation of a DER while the DER is interconnected to the distribution system **for more than 100 milliseconds**"	The Company supports GRIT's recommendation
Enphase and Tesla TSSA	Recommends requiring DSPs to allow DERs to install customer-	The Company opposes this recommendation at this time.

ConnectDER	owned meter socket adapters (MSAs) or meter collars between the DSP's meter and the meter socket or base	MSAs can increase the risk of safety hazards for the customer and DSP employees
GRIT	Recommends changing the protective clearing time from 0.16 seconds to 0.167 seconds	The Company opposes this recommendation. 0.16 seconds is the IEEE 1547 standard
GRIT	Recommends deleting the intertie relay protective functions in 25.212(e)(6)(D-G)	The Company opposes this recommendation. IEEE 1547 applies to DERs paralleling for 6 cycles or more. The 25.212(e)(6) technical requirements specifically apply to DERs paralleling for 60 cycles or less
GRIT	Recommends replacing the words "nameplate capacity" with "grid synchronous capacity"	The Company opposes this recommendation. "Nameplate capacity" aligns with IEEE 1547, which uses the term "Nameplate rating"
TPPA	Recommends that the requirement for DSPs to maintain DER records should be limited to 2 years, should not include "documents generated in the course of processing each application" or "correspondence regarding each application," and that the annual reporting obligation should be on the DERs instead of the DSPs	The Company supports this recommendation
Hunt	Recommends shortening the pre-screen study time and for the pre-screen study results to include a non-binding, high level cost range estimate	The Company opposes shortening the pre-screen study time but supports the inclusion of a non-binding, high level cost range estimate in the study results
Enphase and Tesla TSSA	Recommend that DSPs permit the use of power control systems (PCS) to limit DER exports and to take PCS into account when conducting interconnection studies and determining the need for distribution system upgrades to	The Company is currently reviewing technical barriers related to PCS and does not have a position at this time

	support the DER interconnection	

Regarding new technologies in particular (such as the use of meter sockets and PCS), the Company believes that introducing new DER technologies without sufficient time for evaluation could result in unintended interactions between new technology and existing system equipment. Standardized requirements can provide a baseline, but they must allow for flexibility and DSP-specific review processes. Without this, DSPs may be forced to integrate devices that have not been fully vetted for compatibility with their systems, increasing the risk of equipment failure, mis-operation, or unsafe working conditions. To mitigate these risks, DSPs should have adequate time and discretion to evaluate new technologies to ensure that standardized requirements account for local system compatibility and utility personnel safety. While the Company supports DER innovation and standardization, any new technologies must meet the standards set by both the Commission and the DSPs responsible for maintaining a safe and reliable grid. Currently, the Company achieves new technology approval by referencing industry best practices like but not limited to the California Energy Commission (CEC) Solar Equipment list, Underwriters Laboratories (UL) certification, Institute of Electrical & Electronics Engineers (IEEE) standards, and National Electric Code (NEC). This ensures the new technologywould allow the DSP to operate and maintain a safe and reliable grid.

More generally, to the extent parties advocated in their comments for the elimination of study fees and the shortening of study times, the Company opposes that. DSPs incur costs to conduct the studies that should be recovered from the DERs that benefit from those studies, and the time needed to conduct a study may vary depending on a number of factors, one of which is the number of studies being requested by a single DER applicant. While the proposed 25.210 rule incorporates flexibility around the study times for DERs over 250 kW, the proposed 25.211 rule for DERs of 250 kW or less does not. Specifically, the Company believes that the study and processing times in 25.211(f)(2)(A), (h)(1), and (l)(1)-

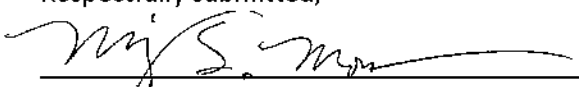
(2) should be allowed to be extended if the total number of pre-interconnection studies pending with the DSP exceeds 25 sites, and that a DER operator who submits 25 or more interconnection applications at once should be treated as a bulk interconnection submission. For bulk interconnection submissions, the DER operator may indicate the prioritization for the DSP to apply to each individual application.

Overall, CenterPoint Energy supports consistency and standardization of the interconnection process, but with the recognition that each DSP operates its system differently, which may require some flexibility for DSPs to vary from those standards as necessary to ensure that the safety and reliability of their distribution systems is maintained.

CONCLUSION

The above reply comments do not address every recommendation made in the initial comments, and CenterPoint Energy's silence on any recommendation made by a party in the initial comments but not addressed in these reply comments should not be interpreted as the Company supporting or opposing those other recommendations. CenterPoint Energy continues to review those recommendations and looks forward with working with stakeholders and engaging in technical conferences to help facilitate efforts to achieve stakeholder consensus on the rule changes that should be adopted.

Respectfully submitted,



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