



## **Filing Receipt**

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**Control Number - 54233**

**Item Number - 119**

**PROJECT NO. 54233**

<b>TECHNICAL REQUIREMENTS AND</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>INTERCONNECTION PROCESSES</b>	<b>§</b>	
<b>FOR DISTRIBUTED ENERGY</b>	<b>§</b>	<b>OF TEXAS</b>
<b>RESOURCES (DERs)</b>	<b>§</b>	

**REPLY COMMENTS OF SOUTHWESTERN ELECTRIC POWER COMPANY**

Southwestern Electric Power Company (SWEPCO), a vertically integrated utility operating outside of ERCOT in the Southwest Power Pool, submits these reply comments in response to the Commission's discussion draft and initial stakeholder filings in Project No. 54233. SWEPCO appreciates the Commission's efforts to modernize the interconnection framework for distributed energy resources (DERs) and supports the goal of ensuring safe, reliable, and efficient integration of DERs into the Texas electric grid.

**I. SWEPCO'S REPLY COMMENTS**

**Opposition to Open Access Tariff for Wholesale Transmission Service at Distribution Voltage (WTSDV)**

SWEPCO agrees with other stakeholders that the requirement for distribution service providers to file an open access tariff for WTSDV should not apply to utilities outside ERCOT. Non-ERCOT utilities are regulated by the Federal Energy Regulatory Commission (FERC) for wholesale transactions, including wholesale transmission service that utilizes distribution facilities.<sup>1</sup> Imposing a state-level tariff requirement on these utilities risks regulatory duplication and jurisdictional conflict.

SWEPCO's Recommendation:

- Revise 16 TAC § 25.210(k) to include an exemption for non-ERCOT utilities.

**II. CONCLUSION**

SWEPCO appreciates the opportunity to provide these reply comments and thanks the Commission for its thoughtful engagement with stakeholders throughout this rulemaking process.

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<sup>1</sup> Southwestern Public Service Company's Initial Comments on Discussion Draft of New 16 TAC § 25.210, Amendments to § 25.211 and Repeal and Replacement of § 25.212 at 11 (June 27, 2025) and Golden Spread Electric Cooperative's Initial Comments on Discussion Draft of New 16 TAC § 25.210, Amendments to § 25.211 and Repeal and Replacement of § 25.212 at 3 (June 27, 2025).

Submitted: August 8, 2025

Respectfully submitted,



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**ON BEHALF OF SWEPCO**

**PROJECT NO. 54233**

<b>TECHNICAL REQUIREMENTS AND</b>	<b>§</b>	<b>PUBLIC UTILITY COMISSION</b>
<b>INTERCONNECTION PROCESSES</b>	<b>§</b>	
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**REPLY COMMENTS OF SOUTHWESTERN ELECTRIC POWER COMPANY**

**EXECUTIVE SUMMARY**

Southwestern Electric Power Company (SWEPCO) submits these reply comments in Project No. 54233. SWEPCO offers the following recommendation:

- Opposition to Open Access Tariff for Wholesale Transmission Service at Distribution Voltage (WTSDV): SWEPCO opposes the requirement for distribution service providers outside of ERCOT to file a WTSDV tariff. Such a requirement risks regulatory duplication and conflicts with Federal Energy Regulatory Commission jurisdiction. SWEPCO recommends that the Commission revise proposed 16 TAC § 25.210(k) to include an exemption for non-ERCOT utilities.