Filing Receipt

Filed Date - 2025-08-08 03:03:57 PM

Control Number - 54233

Item Number - 125

PROJECT NO. 54233

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

REPLY COMMENTS OF BASE POWER COMPANY ON STAFF DISCUSSION DRAFT DOCUMENTS

Base Power Company (Base) would like to express its gratitude for the opportunity to provide written reply comments in Project No. 54233 following the initial discussions and feedback shared by stakeholders in this pivotal rulemaking process. We value and appreciate the insights and commitment of all stakeholders involved in this rulemaking and acknowledge the concerns of all parties in ensuring a reliable, safe, and resilient electricity grid.

Base continues to advocate for the adoption of a separate residential and small commercial interconnection agreement for resources at or below 50 kW. Such a standardized process should include the necessary elements to ensure system reliability, but should not include additional complex requirements that are more applicable to larger resources.

RESPONSE TO COMMENTS

At a high level, Base observes a broad spectrum of opinions among stakeholders on key aspects of the draft rules proposed by Commission Staff, particularly regarding the appropriate timelines for interconnection and the ongoing debate between trusting innovative, certified systems and allowing Transmission and Distribution Utilities (TDUs) the discretion to make necessary considerations. To the latter, and as we noted in our

initial comments, technological innovation and standardized requirements are not oppositional; they are mutually reinforcing. There indeed is shared recognition amongst stakeholders for the need for policies that evolve alongside the growing integration of distributed energy resources (DERs). We believe that building upon this consensus is in the best interest of all parties, as it will enable continued growth while safeguarding the resilience of the Texas electricity grid.

We maintain our assertion that recognizing a separate process for lower kW DERs is fundamental to achieving efficient standardization of the interconnection process for all parties. Small residential and commercial DERs under the 50kW nameplate capacity merit further streamlined interconnection standards and should not receive the same interconnection treatment as larger-scale DERs. Continuing to group these assets together further enables the bottleneck to deployment of certified innovative solutions designed to solve the concerns plaguing distribution system reliability and safety.

Reply to Centerpoint Energy, Oncor, Texas-New Mexico Power, and AEP Texas. Several utilities commented on the imposition of firm timelines as burdensome for processing, pre-screen studies, and impact studies, and suggested instead "reasonable" timelines up to the discretion of the DSP.[1] Our experience suggests, however, that DSPs are already non-compliant with existing § 25.211 interconnection timelines directly and adversely affecting customer experience and hindering deployment efficiency. Base understands the workload carried by utilities in processing

[1] *See* case no. 54233-111, pg. 3. https://interchange.puc.texas.gov/Documents/54233_111_1513968.PDF; case no. 54233-99, pg. 4. https://interchange.puc.texas.gov/Documents/54233_99_1513811.PDF and case no. 54233-97, pg. 5. https://interchange.puc.texas.gov/Documents/54233_97_1513785.PDF

an ever-growing number of interconnection agreements for DERs. This is precisely why we have recommended a separate and more streamlined rule that would allow utilities to process applications more efficiently and relieve much of their burden, further allowing them to comply with PUCT-imposed timeframes that are necessary to uphold. By streamlining and standardizing the process for DERs under 50 kW, we effectively eliminate the unnecessary complexities that have contributed to delays. In essence, this new rule would alleviate the burden that the utilities have highlighted. With a more efficient, straightforward process, utilities would be better positioned to meet their reliability obligations within a shorter timeframe. Base has proposed a shortened 15-day review period but supports other DER stakeholders' suggestion of 14 days[2]. We believe that adopting this rule and timeframe would enhance the overall cost and time efficiency of the interconnection process without sacrificing safety risk.

Base urges the Commission to address a residential rule within this docket as the issues created by a lack of standardization and non-compliance with deadlines are currently felt by DER installers, customers, and the grid at large. In April of this year, Base recorded 327 battery projects out of the interconnection review compliance timeframe. These projects were not rejected, simply stuck in the utility's interconnection queue. This experience is evidence of the backlog that will continue to grow unless a simplified and standardized process is adopted. It is clear that DERs make up a growing resource within ERCOT, providing backup power to residents and capacity to the grid. DER participation will continue to grow, if the regulatory landscape allows it, meaning that the interconnection queue will inevitably become the red-rape that blocks consumer

[2] *See* case no. 54233-12, pg. 43 https://interchange.puc.texas.gov/Documents/54233_109_1513962.PDF and case no. 54233-109, pg. 5 https://interchange.puc.texas.gov/Documents/54233_109_1513962.PDF

access to these resources—unless this distinction between residential and larger-scale resources is made.

Reply to Oncor.

Applicability between §25.210 and §25.211

Oncor's suggestion to apply the proposed 250 kW interconnection process to all systems under 1 MW would eliminate a critical opportunity to streamline and simplify the process for the smallest systems. Rather than moving towards greater efficiency through differentiation, Oncor's approach flattens all sub-1 MW resources into a single category, despite differences in complexity, impact, and risk.

Base respectfully urges the Commission to retain the existing 250 kW threshold and to introduce an additional threshold at or below 50 kW for resources that meet nationally recognized equipment standards. These smaller DERs are highly standardized and pose minimal risk to system reliability when certified under UL 1741 and IEEE 1547. Notably, Oncor itself has emphasized that interconnection processes should scale with the size and complexity of the resource.[3] If larger systems require more detailed studies and review, as Oncor argues, then it follows that the smallest, more uniform systems warrant less scrutiny and a more efficient path to interconnection. A dedicated ≤50 kW pathway would reflect this logic, reduce administrative burden, and encourage continued deployment of safe, low-impact DERs.

Base supports a rule structure that reflects the actual characteristics of the resources being interconnected–not just their position under a single MW threshold.

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[3] *See* case no. 54233-94, pg. 4 https://interchange.puc.texas.gov/Documents/54233_94_1513679.PDF

Standardized, certified, and low-capacity DERs should not be treated as though they require the same level of utility involvement as more complex systems approaching 1 MW. Across U.S. interconnection standards, project size is one of the most reliable indicators of study complexity and potential system impact. Residential-scale DERs at or below 50 kW, especially certified inverter-based systems, are routinely processed through "fast-track" or "simplified" review because their impacts are well-understood, more predictable, and rarely require utility upgrades. The Interstate Renewable Energy Council's Model *Interconnection Procedures*[4] (2023) recommend a dedicated Simplified Process for certified inverter-based DERs ≤ 50 kW, a design choice premised on the low risk these systems pose. Similarly, DOE's *i2x DER Interconnection Roadmap* (2025) advises aligning study pathways and fees to export size, citing ≤ 50 kW systems as best candidates for expedited review.[5] This size-based differentiation reflects field experience: small, dispersed residential systems tend not to trigger the voltage or protection-coordination issues that can arise with large projects.

Reply to Tesla and Enphase.

Tesla and Enphase rightly emphasize the need for a streamlined interconnection pathway for smaller DERs. For the reasons stated above, Base is strongly aligned with our industry colleagues' sentiment here.

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[4] *See* IREC Model Interconnection Procedures, 2023 https://irecusa.org/wp-content/uploads/2023/08/IREC-Model-Interconnection-Procedures-2023-FINAL-8.23.23.pdf

[5] *See* DOE i2x DER Interconnection Roadmap, 2025. pg. 25 https://www.energy.gov/sites/default/files/2025-01/i2X%20DER%20Interconnection%20Roadmap.pdf

Reply to Alison Silverstein Consulting.

Base supports the interconnection framework proposed by Alison Silverstein Consulting as a clear and applicable model for DERs at or below 50 kW. In particular, Base agrees with the principle that any resource that complies with nationally recognized standards and demonstrates that it will not overload utility equipment–either by staying within transformer limits or by incorporating certified dynamic export limiting—shall be approved for interconnection. Specifically, if an installer selects a system configuration from a standardized, dropdown-style menu of pre-approved equipment and design types, and the system matches those specifications, the application should proceed through a simple and streamlined workflow. These applications should not be delayed or rejected based on arbitrary or format-based utility preferences that lack a direct connection to safety or reliability. A dropdown-based process, inclusive of the information illustrated in Exhibit A, provides a consistent method for evaluation of standard DER installations. Base is open to continuing the conversation with other stakeholders to determine what, if any, additional information would be necessary for the installer to provide.

Exhibit A.

Premise Unique Identifier/Site Name	Street Address of the Premise	City	Zip	ESIID	Type of Controllable Device
Premise_01					BESS ≤ 50 kW

Cert. Compliance with IEEE 1547-2018 and UL 1741-SA	If inverter-based resource: Inverter make and model	PCS limiting ability	Maximum withdrawal capability of device in kW	Maximum injection capability of device in kW
			Numeric to 0.1 kW precision	Numeric to 0.1 kW precision
Yes	Make/model	Yes		

CONCLUSION

Base Power is grateful for the opportunity to contribute to this vital discussion and remains committed to a constructive partnership with the Commission and all stakeholders to find effective solutions to ensure a consistent, resilient, and affordable energy landscape in Texas.

Respectfully submitted,

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COMMENTS OF BASE POWER COMPANY ON STAFF DISCUSSION DRAFT DOCUMENTS

EXECUTIVE SUMMARY

- Base Power maintains its position that a smaller interconnection rule designated for residential and small commercial interconnections at or below 50kW is necessary to fulfill the spirit of this rulemaking.
- The current interconnection framework creates unnecessary complexity and delays for small DERs at or under 50kW that satisfy technical requirements and are pre-certified to UL 1741 and IEEE 1547 standards
- Project delays are already a significant barrier to customer access and DER market growth. In April 2024 alone, Base recorded 327 residential battery projects that exceeded the existing §25.211 compliance timelines—not due to rejections, but because they were stalled in utility queues. This backlog will continue to grow without a simplified, enforceable, and standardized process for ≤50 kW resources.
- Base Power's ≤50kW interconnection pathway would involve standardized application formats including a drop-down-style menu of pre-approved equipment and design configurations to ensure uniformity across utilities, reduce

administrative burden, and prevent rejection based on non-critical format or preference issues.

- Base is open to continuing the conversation with stakeholders on potential adjustments to its proposed Exhibit A.
- There is growing stakeholder alignment around this approach as industry peers, including Tesla, Enphase GRIT, and TSSA, have endorsed the need for a simplified and standardized interconnection path for residential and small commercial DERs.
- Base Power's proposal represents a modernization of interconnection rules as is reflected in industry practices in other jurisdictions, not a relaxation of safety standards.