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PROJECT NO. 54233

TECHNICAL REQUIREMENTS AND	§	BEFORE THE
INTERCONNECTION PROCESSES FOR	§	PUBLIC UTILITY COMMISSION
DISTRIBUTED ENERGY RESOURCES	§	OF TEXAS
(DERs)	§	

**ENCHANTED ROCK LLC'S RECOMMENDED TOPICS FOR WORKSHOP
DISCUSSION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Enchanted Rock, LLC. ("Enchanted Rock") appreciates the careful consideration being given to reform of 16 TAC §25.211 and §25.212 to ensure interconnection regulations "enable maximum distribution energy resource (DER) development" and to "provide necessary protections to maintain reliability". More efficient interconnection processes will open up greater opportunities for DER participation in Texas. These resources will support enhanced reliability and resiliency for the grid and consumers.

As a leading DER provider in Texas, Enchanted Rock encourages the Commission to consider the following topics for discussion, either at the May 4th workshop or in subsequent workshops:

- a. Per 16 TAC §25.211(h)(3), "a utility may postpone processing an application for an individual distributed generation facility under this section if the total existing distributed generation on the targeted feeder represents more than 25% of the total load of the secondary network under consideration." In practice, we have seen this threshold applied as a one-third feeder loading rule as a hard cap on what a utility is willing to interconnect for export from behind-the-meter DERs. The threshold is conservative and does not reflect modern grid management technologies and processes that can accommodate higher levels of Distributed Generation (DG) activity on a feeder. We recommend discussion and evaluation of an updated standard to facilitate higher, flexible feeder loading limits. In conjunction with feeder loading evaluation, utilities have expressed operational

concerns regarding the management of exporting DERs and have required the deployment of transfer trip. However, utility side transfer trip infrastructure can be prohibitively expensive for a single DER to bear. Given the broad benefits of transfer trip to all interconnecting DERs on the feeder and to the utility via greater operational visibility and flexibility, we recommend for a future workshop discussion of socializing utility side transfer trip costs. Deployment of economic transfer trip may also help utilities manage higher feeder loading levels.

2. The PUC should consider establishing streamlined and standardized processes for applications across the utilities, as DER customers have to navigate disparate processes across all utilities under ERCOT. Consistent processes across the utilities will allow DER developers, who typically work with modular, repeatable systems and designs, to scale quickly and efficiently. For example:
 - a. Data requests and documentation requirements vary significantly across the utilities but should be standardized.
 - b. Testing requirements and processes vary by utility. We have also found significant delays with respect to on-site testing requirements due to utility resource constraints. We recommend exploration of alternative testing methods to speed up the issuance of permission to operate notice from the utilities.
 - c. A consistent and transparent process for handling utility interconnection costs and sales of facilities is required. Some utilities refund payments for under-spend versus initial cost estimates while others keep the payment and provide no detail on actual spend. Requirements and processes related to the sales of facilities when moving customers from secondary to primary service can sometimes seem arbitrary.

As the Commission continues to move forward with Project 54233 and related efforts, Enchanted Rock is committed to providing assistance and input on the DER interconnection effort to ensure improved grid reliability and stability. Keeping the lights on for Texans is as

central to our business model as it is a goal of the Commission, and we are ready to provide any help we can.

Respectfully submitted,

Enchanted Rock, LLC

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