



## **Filing Receipt**

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**Control Number - 54233**

**Item Number - 41**

**PROJECT NO. 54233**

**TECHNICAL REQUIREMENTS AND  
INTERCONNECTION PROCESSES  
FOR DISTRIBUTED ENERGY  
RESOURCES (DERs)**

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**PUBLIC UTILITY COMMISSION  
  
  
OF TEXAS**

**TEXAS SOLAR POWER ASSOCIATION'S AND SOLAR ENERGY INDUSTRIES  
ASSOCIATION'S RECOMMENDED ADDITIONAL WORKSHOP TOPICS**

The Texas Solar Power Association (TSPA) and the Solar Energy Industries Association (SEIA) (collectively, Solar Associations) appreciate the opportunity to participate in the May 4, 2023 Workshop to discuss the proposals by the Public Utility Commission of Texas Staff (Commission Staff) to update interconnection and technical requirements for distributed energy resources (DERs) as outlined in Commission Staff's April 18, 2023 Memorandum. In that Memorandum, Commission Staff invited interested persons to identify additional recommended topics for inclusion in the May 4, 2023 Workshop Agenda or in separate future workshops. Solar Associations recommend that it would be beneficial to discuss in a future workshop: (1) the inclusion of specific deadlines in the proposed rules; (2) the requirement that Distribution Service Providers (DSPs) perform a re-occurring integration Capacity Analysis to determine hosting capacity on their systems; (3) the updates of technical screening processes to reflect industry best practices leveraging UL1741SBv3 inverters and expedited interconnection processes such as removing or modifying load screens depending on system size; (4) establishing a fixed interconnection fee for small, residential DG; and (5) the simplification and automation of the interconnection process for smaller systems. Many of these items were also identified in the Solar Associations Comments<sup>1</sup> and Reply Comments<sup>2</sup> filed in this project in response to the Commission Staff's discussion drafts.

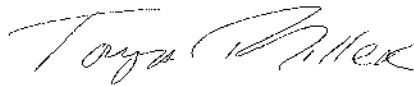
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<sup>1</sup> TSPA and SEIA Joint Initial Comments on Staff Discussion Draft, Project No. 54233, *Technical Requirements and Interconnection Processes for Distributed Energy Resources (DERs)*, January 6, 2023.

<sup>2</sup> TSPA and SEIA Joint Reply Comments on Staff Discussion Draft, Project No. 54233, *Technical Requirements and Interconnection Processes for Distributed Energy Resources (DERs)*, January 18, 2023.

Solar Associations also support Oncor's request to include Contribution in Aid of Construction (CIAC) issues in a future workshop. Finally, Solar Associations previously commented<sup>3</sup> that we support the application of standardized interconnection and technical requirements state-wide and proposed that the rules apply to municipally owned utilities and electric cooperatives (under certain conditions). Although this issue will not be discussed at the May 4, 2023 Workshop, Solar Associations recommend this item be included as a future workshop topic.

Respectfully submitted,



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<sup>3</sup> See. TSPA and SEIA Reply Comments at 6.