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PROJECT NO. 54233

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

**JOINT TDUS' INITIAL COMMENTS ON A POTENTIAL REQUIREMENT TO
REPORT HOSTING CAPACITY**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

Oncor Electric Delivery Company LLC ("Oncor"), Texas-New Mexico Power Company, and AEP Texas Inc. (collectively, the "Joint TDUs") file these initial comments in response to the Public Utility Commission of Texas ("Commission") Staff's May 26, 2023 memorandum inviting interested persons to file proposed language regarding a potential requirement for distribution service providers ("DSPs") to report hosting capacity, both for purposes of discussion at an upcoming distributed energy resources ("DER") workshop and for potential inclusion in a proposal for publication. The Joint TDUs timely file these comments on or before the June 5, 2023 deadline set forth in Commission Staff's memorandum.

At this time, the Joint TDUs have no proposed language regarding a potential requirement for DSPs to report "hosting capacity," irrespective of what the term may be interpreted to include. As Oncor stated in its reply comments previously submitted in this Project,¹ Oncor and the other Joint TDUs oppose such a requirement, largely because the protection of confidential and critical information is required for the safe and reliable operation of the delivery system, among other concerns. If, however, the Commission elects to consider some form of hosting capacity reporting, then the Joint TDUs urge the Commission to first request an implementation analysis of each of the various possible modes of reporting for this kind of requirement. Before any hosting capacity reporting requirement is included in a proposal for publication, the time and effort required to provide a report (in addition to the security risks) should be carefully weighed against the nominal value such a report could provide.

The Joint TDUs appreciate the opportunity to provide input on this issue and respectfully suggest that the proposed rule not include a requirement to report hosting capacity. The Joint

¹ Oncor Electric Delivery Company LLC's Reply Comments on Staff Discussion Draft Proposed Changes to §§ 25.211 and 25.212 at 9-10 (Jan. 18, 2023).

TDU look forward to participating in additional workshops and/or technical conferences on this and other DER-related issues before a proposal for publication is issued.

Respectfully submitted,

Oncor Electric Delivery Company LLC

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