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

**COMMENTS OF TEXAS ADVANCED ENERGY BUSINESS ALLIANCE
ON TECHNICAL REQUIREMENTS AND INTERCONNECTION PROCESSES FOR DISTRIBUTED
ENERGY RESOURCES (DERS)— DER WORKSHOPS**

TAEBA includes local and national advanced energy companies seeking to make Texas's energy system secure, clean, reliable, and affordable. Advanced energy technologies include energy efficiency, energy storage, demand response, solar, wind, hydro, nuclear, and electric vehicles ("EVs"). Used together, these technologies and services will create and maintain a higher performing energy system—one that is reliable, resilient, diverse, and cost effective. TAEBA's membership also includes advanced energy buyers, representing the interests of large electricity consumers interested in increasing their purchases of advanced energy to meet clean energy and sustainability goals.

On May 26th, 2023, Commission Staff requested language recommendations regarding a requirement for Distribution Service Providers (DSPs) to report hosting capacity. TAEBA suggests that the Commission adopt language that "directs all jurisdictional utilities to conduct system analyses and publish hosting capacity information on a secure website that is accessible to customers and DER providers. The system analyses and provision of hosting capacity data must be done at least annually but may be done more frequently as needed."

Additional considerations for the Commission include:

- The PUCT and ERCOT should meet and exceed the minimum standards set forth by FERC Order 2222, providing a level of standardization driving market participants to Texas. For a better understanding of DER utilization and participation formats, including examples of both retail and wholesale market services that can be provided by DERs, we recommend reviewing *FERC Order No. 2222 and the Use Cases It Can Unlock and FERC Order 2222 Implementation: Preparing The Distribution System For DER Participation In Wholesale Markets*.^{1,2}

¹ FERC Order No. 2222 and the Use Cases It Can Unlock (2021)

² FERC Order 2222 Implementation: Preparing The Distribution System For DER Participation In Wholesale Markets (2022)

- TAEBA recommends adopting the industry-standard, technology-neutral definition for DER, which is "any resource located on the distribution system, any subsystem thereof or behind a customer meter."
- We recommend reviewing TAEBA's *Future Proofing the Texas Grid with Distributed Energy Resources* report provides five use cases that exemplify policies and programs across the country that successfully meet customer needs while delivering resilience and cost benefits.³
- *The Non-Wires Solutions Implementation Playbook* by the Rocky Mountain Institute may be useful for the Commission Staff to review. It details many key considerations for distributed energy resources including hosting capacity.⁴ At the time of publishing (2018), the report identified multiple states that require utilities to publish hosting capacity maps on their websites. This data enhances grid transparency and facilitates optimal resource development.

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³ Future Proofing the Texas Grid with Distributed Energy Resources (2022)

⁴ The Non-Wires Solutions Implementation Playbook: A Practical Guide For Regulators, Utilities, And Developers (2018)

