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PROJECT NO. 54233

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

INITIAL COMMENTS OF AEP TEXAS INC.

AEP Texas Inc. respectfully files these initial comments on the redlines to the discussion draft provided by the Staff (“Staff”) of the Public Utility Commission of Texas (“Commission”) in Commission Staff’s June 9, 2023 and June 23, 2023 memoranda, which contains proposed new 16 Texas Administrative Code § 25.210. AEP Texas appreciates Commission Staff hosting technical workshops to address the technical and interconnection requirements included in their draft redlines. AEP Texas participated in those workshops and generally agrees with the positions offered by the transmission and distribution utilities during those discussions. AEP Texas offers these comments for Staff’s consideration for inclusion in its Proposal for Publication of § 25.210.

I. Initial Comments

AEP Texas offers these observations for Commission Staff’s consideration in the development of the Proposal for Publication of § 25.210.

Applicability threshold and power unit

AEP Texas supports the proposed 250 kW and above threshold for applicability of new § 25.210, recognizing that 1 MW and above also could be a reasonable threshold for applicability. AEP Texas supports using kVA when referring to the nameplate capacity of a DER facility because it represents the actual current and impact on system capacity.

Allowable expenditure

AEP Texas supports Oncor’s workshop recommendation to change “allowable expenditure” to “standard allowance” to better align with tariff language. As AEP Texas understands Oncor’s proposal, the “standard allowance” would be applicable only to DERs with a load component, such as DESRs.

Contribution in aid of construction

AEP Texas supports clarifying that cost estimates should use general cost categories to characterize both estimated and actual costs of projects that would include descriptions and estimated costs of distribution system upgrades and substation upgrades.

Pre-screen study and costs

AEP Texas reiterates that performing pre-screen studies does not represent a reservation of capacity for the DER, and the queue should be considered when setting lead time expectations.

Impact study and lead time

AEP Texas encourages Commission Staff to include extension of time language for impact studies that mimics the language in the pre-screen study section in proposed (e)(3). Specifically, Commission Staff could insert the following sentence in proposed (f)(2)(B): Such time may be extended if a DER provider and its affiliates collectively request studies for more than five sites currently pending with the DSP, or if the total number of studies pending with the DSP exceeds ten sites.

II. Conclusion

AEP Texas appreciates the Commission's consideration of these initial comments on Commission Staff's redlined discussion drafts considered in technical workshops. We look forward to continued discussions on these issues.

Respectfully submitted,

/s/ Leila Melhem

Leila Melhem
State Bar No. 24083492
AMERICAN ELECTRIC POWER SERVICE
CORPORATION
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3321
Facsimile: (512) 481-4591
Email: lmelhem@aep.com

ON BEHALF OF AEP TEXAS INC.