



## **Filing Receipt**

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**PROJECT NO. 54233**

<b>TECHNICAL REQUIREMENTS AND INTERCONNECTION PROCESSES FOR DISTRIBUTED ENERGY RESOURCES (DERs)</b>	<b>§ § § §</b>	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**TEXAS-NEW MEXICO POWER COMPANY’S COMMENTS ON COMMISSION  
STAFF’S REDLINE DISCUSSION DRAFT OF 16 TAC § 25.212**

**TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:**

Texas-New Mexico Power Company (“TNMP”) submits these comments in response to Commission Staff’s redlines to the discussion draft of 16 Tex. Admin. Code (“TAC”) § 25.212 and the July 14, 2023 workshop related to the technical requirements for interconnection and parallel operation of Distributed Energy Resources (“DERs”).

**(a) Application.** TNMP requests a definition for “nameplate capacity” to establish and clarify the meaning. Currently, TNMP understands the meaning of “nameplate capacity” as it is defined by the Electric Reliability Council of Texas (“ERCOT”). TNMP prefers to keep the term “nameplate capacity” consistent throughout the section, and in accordance with ERCOT’s definition, rather than substituting the term for one that is not widely used in the industry.

Further, TNMP understands that ERCOT is planning to refine its protocols as they relate to topics in subsections § 25.212 (a) and (k), including the Voltage and Frequency Standards and Requirements for the 1 MW DERs. TNMP reserves its ability to make suggested revisions to those subsections on the application of ERCOT’s revisions of those protocols.

**(c)(2)(A):** This subsection should be amended to read “a *completed* interconnection application” to avoid potential confusion and to establish a specific deadline for the legacy-status cutoff. TNMP shares the concern of other commenters regarding an influx of *incomplete* applications before the January 1, 2024 deadline, submitted to TNMP to qualify as having legacy

status. A potential influx would result in a higher burden on DSPs to accommodate and analyze incomplete interconnection applications.

Further, Staff asked for feedback related to the amount of time between the implementation of the rulemaking and the application of the rulemaking to ensure consistent application. TNMP suggests a period of ninety (90) days between the completed rules and the application of the rules.

**(c)(3)(B)(i)-(iv):** The requirements in this subsection attempt to encapsulate the various factors that would require a legacy DER to transition to the standards required for a new DER. The factors, however, are variable. TNMP suggests that the rule allow a DER and DSP to mutually agree (with the DSP's final approval) on whether certain changes in the DER system will require the DER to transition to the new standards. For example, TNMP suggests including language in (c)(3)(B) such as "A legacy DER may be required, after review by a DSP, to transition to the standards required for a new DER under subsection (c) of this section within 90 calendar days of: . . .". This modification would allow greater flexibility and efficiency to the potential changes within a DER system as technology, cost, and size evolve between system generations.

**(d) Operational Standards and performance requirements for new DERs.** TNMP recognizes Staff's intention to use tables in this section that align with the default settings under IEEE 1547. However, TNMP supports recommendations to reflect the IEEE ranges and to allow for flexibility as DSPs may need to specify other settings and alter the default standards due to variations in DSP systems.

**(f)(4)(A):** TNMP supports recommendations to allow for flexibility in applying the default IEEE 1547 standards. Each DSP's system is unique. Different DSP's systems, or even different locations within one system, may require a deviation from the IEEE default standards for safety or the DSP's protection requirements.

**(f)(7):** TNMP supports the as-written language in this subsection, specifically the requirement that the DER exporting energy to the DSP's distribution system must have a redundant circuit breaker. TNMP suggests removing the following language, "unless a listed device suitable for the rated application is used or the DSP has a circuit breaker or other interrupting device on the DSP's side of the POI cable of interrupting current to the distribution resource." TNMP strongly prefers the DER to maintain its own circuit breaker in addition to the DSP circuit breaker.

**(g)(2)(C)(iv):** TNMP supports the inclusion of the stricken language: "A DSP may also require communication based telemetry and transfer trip by the company as part of a transfer tripper or blocking scheme." The sentence is included in subsections (ii)-(iii), which relate to nameplate capacities < 2 MW. The language throughout the subsections should therefore remain consistent, particularly as the additional protection is necessary for nameplate capacities that are larger than those in (ii) and (iii), (*e.g.*, > 2 MW). DSPs will work with DERs to analyze the costs and need for a transfer trip before requiring it, but DSPs require the protection that this phrase establishes.

**(j)(1):** The requirement for DSPs to review logs at least once every 30 calendar days in this subsection is unnecessary and burdensome to DSPs. TNMP suggests amending this language to read: "The DSP may review such logs as often as reasonably practicable."

## **CONCLUSION**

TNMP appreciates Staff conducting the workshops and for their thoughtful drafting of these proposed rule changes.

Respectfully submitted,

/s/ Scott Seamster

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