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**PUC PROJECT NO. 54584**

**RELIABILITY STANDARD FOR THE § PUBLIC UTILITY COMMISSION  
ERCOT MARKET § OF TEXAS**

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S REPLY COMMENTS**

Oncor Electric Delivery Company LLC (“Oncor”) timely files these Reply Comments on April 5, 2023, based on the memorandum filed by Staff (“Staff”) of the Public Utility Commission of Texas (“Commission”) in this project on March 7, 2023.

Oncor commends Staff for recognizing the need to incorporate transmission deliverability considerations in the Commission’s development of a reliability standard. As this process unfolds, the holistic nature of transmission planning should be preserved. When assessing resource adequacy, including the transmission deliverability dimension, against the selected reliability standard, the Commission or the Electric Reliability Council of Texas, Inc. (“ERCOT”) may identify the need for additional transmission capacity. If so, that need should be reflected in all other aspects of transmission planning rather than simply resolved through a one-off process. For example, transmission service providers should have the opportunity, through the Regional Planning Group process, to identify specific transmission solutions to meet the identified transmission need resulting from the resource adequacy analysis. ERCOT also should update its models to include a planned new transmission project in future independent reviews and other analyses. It should likewise incorporate that new transmission need into its period reports, such as regional transmission plans and reports on constraints and needs.

The need for holistic transmission planning underscores a related issue: the need for transparency. The usefulness of the reliability standard will be closely tied to the information market participants can reasonably glean from the results of ERCOT’s analyses. Regardless of which reliability standard the Commission ultimately adopts, it should ensure that stakeholders have visibility into the

modeling ERCOT will use, the assumptions it makes, and the reasons why it may recommend additional resource and/or transmission capacity. Data transparency will enhance the efforts of all stakeholders, including those involved in holistic transmission planning, to meet the reliability standard. Opaque, results-based analyses without visibility into the underlying data and reasoning could cause stakeholders to make unsupported assumptions about those outcomes, which would work against the general desire for integrated planning efforts.

Oncor appreciates the opportunity to provide these Reply Comments and looks forward to working with all stakeholders to implement an effective and transparent reliability standard.

Respectfully submitted,

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**EXECUTIVE SUMMARY – ONCOR’S REPLY COMMENTS**

- Staff has wisely included transmission deliverability considerations in determining an appropriate reliability standard.
- Transmission planning should remain a holistic process, and the results of ERCOT analyses related to the reliability standard should be reflected in all other aspects of region-wide transmission planning efforts.
- The Commission should ensure transparency regarding ERCOT’s models, assumptions, and recommendations, including the reasoning for any additional resources or transmission capacity, to help all stakeholders work towards the common goal of meeting whatever reliability standard the Commission selects.