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DOCKET NO. 55338

**PROCEEDING TO RESOLVE ISSUES §
IN DOCKET NO. 53719 RELATED TO § PUBLIC UTILITY COMMISSION
TRANSPORTATION §
ELECTRIFICATION AND § OF TEXAS
CHARGING INFRASTRUCTURE §**

**AMERICANS FOR AFFORDABLE CLEAN ENERGY’S PROPOSED LIST
OF ISSUES**

Americans for Affordable Clean Energy (AACE) files this Proposed List of Issues pursuant to the Order Requesting Lists of Issues, issued in this Docket by the Public Utility Commission of Texas (Commission) on October 17, 2023.¹ AACE respectfully shows as follows:

I. INTRODUCTION

AACE presents this Proposed List of Issues based on a preliminary analysis of Entergy Texas Inc.’s (Entergy or the Company) proposed Transportation Electrification and Charging Infrastructure (TECI) Rider and Transportation Electrification and Charging Demand Adjustment (TECDA) Rider. AACE anticipates that a more detailed review of the application may result in the identification of additional issues. Accordingly, AACE reserves the right under the Administrative Procedure Act to submit evidence and any arguments on each and every issue raised by Entergy’s filing, regardless of whether or not the issues are specifically identified in this pleading.

I. ISSUES TO BE ADDRESSED

AACE submits the following issues to be addressed in this docket:

1. As proposed, does the TECI Rider comply with Senate Bill 1002, codified at Public Utility Regulatory Act (PURA) Chapter 42?
2. Is the TECI entirely consistent with PURA § 42.0103(o)?
3. Does the TECI Rider support the private sector investment in infrastructure and encourage competitive private sector investment in the deployment of public electric vehicle charging stations?
4. Is the TECDA Rider reasonable and nondiscriminatory?

¹ Order Requesting Lists of Issues (Oct. 17, 2023). The deadline to file a list of issues is November 6, 2023. Therefore, this Response is timely filed.

5. Does the TECDA Rider provide relief to site hosts from uncertain and high demand charges?
6. Does the TECDA Rider support the growth of the competitive EV charging market?

II. ISSUES NOT TO BE ADDRESSED

AACE has not identified any issues not to be addressed.

III. THRESHOLD BRIEFING ISSUES

AACE has not identified any threshold legal or policy issues to be briefed for the purposes of a Preliminary Order.

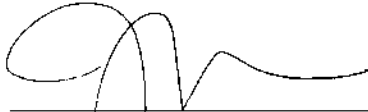
IV. CONCLUSION

WHEREFORE, PREMISES CONSIDERED, AACE respectfully requests the Commission to enter a Preliminary Order consistent with the issues identified above and grant AACE such other and further relief to which it may be entitled. Further, AACE requests that the Preliminary Order include language noting that the list of issues is preliminary, and parties are not precluded from identification and presentation of other issues relevant to the application.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
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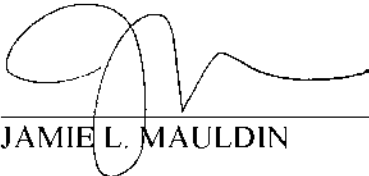
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**ATTORNEYS FOR AMERICANS FOR
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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on November 6, 2023, in accordance with the Order Suspending Rules, issued in Project No. 50664.



JAMIE L. MAULDIN