



## **Filing Receipt**

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**PROJECT NO. 56822**

**INVESTIGATION OF EMERGENCY § PUBLIC UTILITY COMMISSION  
PREPAREDNESS AND RESPONSE §  
BY UTILITIES IN HOUSTON AND § OF TEXAS  
SURROUNDING COMMUNITIES §  
§**

**COMMENTS BY HUNT ENERGY NETWORK L.L.C.**

HEN Infrastructure, L.L.C. (“HEN Infrastructure”) is a registered Power Generation Company (“PGC”) that owns energy storage resources (“ESRs”) that are interconnected at distribution voltage and fully registered to participate in the ERCOT energy and ancillary services markets. Hunt Energy Network, L.L.C. (“HEN”) develops and operates all HEN Infrastructure ESRs in accordance with all Federal, state, local, and ERCOT requirements. HEN, on behalf of itself and HEN Infrastructure, submits the following comments in response to the Public Utility Commission of Texas (“PUCT” or “Commission”) Staff’s invitation for comment on affects to PGC operations by outages to electric, water, sewer, and telecommunications utility outages during the May 2024 Derecho and Hurricane Beryl.

While HEN Infrastructure resources were not impacted by the most severe effects of the storms, the ability to operate and communicate with resources were interrupted. As such, HEN Infrastructure provides the below responses to those Commission’s requests for information that are relevant to HEN or its assets:

PGC 1-1

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### PGC 1-2

Affected Generation Facility	Fuel	County	Distribution Service Provider (DSP)	Gen. Capacity	Summer Net Max Cap.
Lufkin South	Storage	Angelina	Oncor	9.9MW	9.9MW
Weil Tract	Storage	Nueces	AEP	9.9MW	9.9MW

### PGC 1-3

All HEN Infrastructure resources are interconnected to the distribution system. During Hurricane Beryl, Weil Tract was unable to detect incoming voltage or the system frequency from the distribution service provider (“DSP”). The 9.9MW resource was completely forced offline for approximately 14 hours as a result. Additionally, the 9.9MW Lufkin South resource experienced both intermittent telecommunications service throughout the duration of the hurricane and a 12-hour telecommunications outage upon the storms passing. HEN Infrastructure ESR systems were not directly impacted by the storms and were capable of full dispatch absent both telecommunications and distribution system outages.

### PGC 1-6

HEN was well aware of the incoming storm and was prepared to derate and or place the ESR units on outage should the systems be impacted. Upon receipt of, or lack thereof, system data from the DSP (loss of voltage and frequency) and telecommunications, HEN immediately placed the two resources on outage and unavailable for dispatch. No further communications were made with ERCOT and the DSP as a result of HEN’s preemptive preparations.

### PGC 1-9

As evidenced by the two storms and frequently cited data, approximately 90% of customer outages are resultant from distribution system related issues. HEN recommends greater coordination and cooperation between DSPs and distribution connected generation resources (“DGR”) to ensure that these resources are additive to the grid resilience equation, particularly during severe outage scenarios. Additionally, HEN recommends encouraging DSPs and NOIEs to reduce barriers to

DGR interconnection and develop operating systems that incorporate merchant DGRs as part of the DSP system resilience plans. To that end, HEN strongly encourages the Commission to move forward and adopt a comprehensive DGR interconnection rule in Project Nos. 54233 (Technical Requirements and Interconnection Processes for Distributed Energy Resources) and 54224 (Cost Recovery for Service to Distributed Energy Resources).

HEN appreciates the opportunity to offer these comments and is available to answer questions the Commission may have.

Respectfully submitted,

/s/ Stephanie Kroger

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