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PUC PROJECT NO. 56966

GOAL FOR AVERAGE TOTAL RESIDENTIAL LOAD REDUCTION § PUBLIC UTILITY COMMISSION OF TEXAS

Tesla appreciates the opportunity to file comments on the proposal for publication in this project. Tesla is a leading manufacturer of home batteries. Tesla Powerwall devices is installed in hundreds of thousands of homes, and Tesla has been a leader in the ADER Pilot. Tesla also started a retail electric provider in Texas to help create opportunities for Texans to increase the value of their devices.

As such, Tesla must weigh in on the proposal from staff related to responsive device programs from REPs. As proposed, the rule would limit the ability for REPs and demand response providers to contract. For example, some programs may have winter or summer features, but not both. While the Powerwall is fully capable of responding in a variety of situations, mentioning a requirement for winter and summer participation may create confusion, and doesn't add any real value to customers. Similarly, many customers purchase Powerwalls to be used during emergencies for their own needs, and not for the grid. While numerous customers may be willing to do provide services to the grid during emergencies, a requirement to respond to alerts may be problematic or at least create confusion. Finally, one device can participate in multiple programs at the same time. Batteries can provide multiple services simultaneously and often do. A general requirement for participation in a single program is unnecessary, as ERCOT

already has procedures to avoid double dipping into services where it may be inappropriate to provide two services at the same time. Each ancillary service or demand response program has its own program requirements, and failure to meet those requirements is already a violation of the rules and protocols. This additional requirement is simply unnecessary.

For all these reasons, Tesla suggests that the Commission reconsider its approach to responsive device programs to be permissive instead of restrictive or in the alternative consider whether any specific rule language is necessary at this time for this specific topic in order to comply with SB 1699.

Respectfully Submitted,

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