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PROJECT NO. 57236

PROJECT TO DEVELOP	§	**PUBLIC UTILITY COMMISSION**
BACKUP POWER PACKAGE	§	**OF TEXAS**
PROGRAM	§	
	§	

Comments of Schneider Electric

Schneider Electric is a global leader in energy management and automation, with a presence in more than 100 countries, with over 22,000 U.S. employees – 4,500 of which are in Texas – and thousands of U.S.-based clients and partners, appreciates the opportunity to comment on the Texas Backup Power Package Program. Schneider Electric has a strong presence in microgrid technology and solutions and has experience developing both customized and standardized microgrid solutions, including the EcoStruxure Microgrid Flex offering for midsized commercial sites. Schneider Electric's microgrid solutions are designed to enhance energy resilience, efficiency, and sustainability, with a focus on integrating renewable energy sources.

General Response

The Patrick Engineering report is an exceptional work product that reflects thoughtful consideration of the topic. However, there are a few points that Schneider Electric contends and some recommendations for further enhancement.

- The report reflects the assumption that the microgrids will provide no value to the developer for merchant revenue. This is a critical impediment as many developers and operators will not participate without an upside to owning and operating the systems.
- Schneider Electric recommends referencing the possibility of a centralized type microgrid controller, similar to most products that Schneider Electric would deploy. While you could interpret the drawing that way, the report reference SEL, which we believe uses relays to do their microgrid controls rather than dedicated products such as Ecostruxure Microgrid Operations.
    - With regards to Tables 2 and 11:
        - Pricing looks to match simplistic backup generator type microgrids. Advanced microgrids using onsite renewables/storage would be on the higher end of Table 11, even though those type of systems may be more financially viable for customers and preferred to meet good state policy goals.
        - Schneider Electric recommends either modifying the existing tables or add another to focus on levelized cost of energy or another lifecycle type economic metric rather than capital costs; even better, add additional benefits beyond just economics: air quality, GHG reduction, etc. which might meet policy goals.
    - In our experience, we find the following statement to be aggressive and a tad unrealistic at this time: “Delivery times vary from 15 to 25 weeks for systems through 300kW, to 25 to 40 weeks for 1250 - 2500kW systems, up to 15 - 16 months depending on the supplier.”

Response to Questions

2. Flexibility and Applicability of Technical Specifications
    a. How can specifications include performance-based factors for design, installation, or operation without overly burdening a critical facility in installing or maintaining a TBPP?
    b. Should the specifications vary based on the size, type of critical facility, or other criteria? If so, how and for what reasons? How can the specifications be refined to encourage participation from or integration with existing backup facilities?

Schneider Electric recommends adding or expanding the list of Critical Facilities to include all Public Safety-type sites, including prisons.

3. Supply Chain & Deployment
    a. Considering vendors that may utilize alternative fuel sources or other components that can meet the performance criteria, how could the Commission consider adapting the specifications to increase the number of vendors eligible to participate in the program and support other business models?

There are microgrid designs that use alternative energy sources that are also capable of meeting the same performance criteria as a genset. The Commission's specifications should allow for all types of microgrids to compete equally for contracts and allow the best option for each project to prevail. This would increase the number of vendors eligible to participate in the program, such as Schneider Electric's subsidiary Greenstruxure.

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