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PROJECT NO. 57236

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

**GRID RESILIENCE IN TEXAS’ COMMENTS IN RESPONSE TO COMMISSION STAFF’S
QUESTIONS
ON THE TEXAS BACKUP POWER PACKAGE PROGRAM RESEARCH ENTITY FINAL
REPORT**

Grid Resilience in Texas (“GRIT”) appreciates the opportunity to provide comments in response to the questions included in the Public Utility Commission (“Commission”) Staff’s March 6, 2025, memo regarding Patrick Engineering, Inc.’s Final Report on the Texas Backup Power Package Program (“TBPP”). GRIT is comprised of a group of leading flexible generation and microgrid companies, including Enchanted Rock, Generac Power Systems, Mainspring Energy, and PowerSecure Inc. These companies represent projects that encompass a spectrum of sizes, from small-scale behind-the-meter (“BTM”) assets to large generation facilities utilizing various technologies and fuel types. GRIT is improving energy reliability, resiliency, and affordability for Texans by leveraging innovative solutions and stacking value streams for services to the grid and to customers.

COMMISSION QUESTIONS

1. Cost Offsets

The TBPP program must allow flexibility in system and technology sizing to improve affordability. Facilities should be able to right-size systems and leverage BTM opportunities (e.g., demand response, load management) without conflicting with ERCOT’s definitions of “sale of energy or ancillary services.” Strict island-mode-only restrictions make TBPPs financially infeasible.

TBPPs offer superior value over standard generators by enabling hybrid reliability, redundancy, and emissions benefits. Long-term operations and maintenance agreements, coupled with non-outage operational hours, ensure these systems are exercised, maintained, and available when needed.

Alternative ownership models like Resiliency-as-a-Service reduce capital and operational burdens for facilities. Contracts should include clear performance metrics such as availability,

response during grid events, and operational uptime. These structures also support equitable access to TBPPs across a broader range of facilities.

2. Flexibility and Applicability of Technical Specifications

Performance-based specifications should replace rigid design requirements. Switchover requirements of zero seconds are impractical and unnecessarily inflate costs; 10 seconds is standard practice and sufficient for most critical facility operations.

The Commission should expand eligible fuel types to include biogas, renewable natural gas, other alternative gaseous fuels, and generally any fuel capable of operating for at least 48 continuous hours without refueling or connecting to a separate power source. Fuel-flexible technologies improve reliability and access in areas without pipeline infrastructure.

3. Supply Chain and Deployment

Vendor qualification should focus on demonstrated technical, financial, and operational capabilities, not adherence to a fixed technical blueprint. This allows vendors to deliver reliable, cost-effective, site-specific solutions.

If the program depends on vendor outreach and marketing to critical facilities, clarity on key implementation issues (such as permitted BTM use) is essential. Uncertainty limits vendors' ability to design, price, and offer viable solutions to customers.

Supply chain risk is best mitigated through clear program expectations and vendor flexibility in design and delivery timelines.

CONCLUSION

GRIT appreciates the opportunity to submit these responses to Commission Staff's questions for comment on the Texas Backup Power Package Program Final Report. As the Commission continues to move forward with Project No. 57236 and related efforts, GRIT is committed to supporting the effort to ensure improved grid reliability, resiliency, and stability. For more details on any of the above points, please refer to GRIT and GRIT member companies' February 14 submissions in Project No. 57236.

Respectfully submitted,

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**EXECUTIVE SUMMARY OF GRID RESILIENCE IN TEXAS' COMMENTS IN
RESPONSE TO COMMISSION STAFF'S QUESTIONS
ON THE TEXAS BACKUP POWER PACKAGE PROGRAM RESEARCH ENTITY FINAL
REPORT**

- The TBPP program must allow flexibility in system and technology sizing, as well as BTM energy management opportunities, to improve affordability.
- Alternative ownership models like Resiliency-as-a-Service reduce capital and operational burdens for facilities.
- Performance-based specifications should replace rigid design requirements.
- Vendor qualification should focus on demonstrated technical, financial, and operational capabilities, not adherence to a fixed technical blueprint.
- If the program depends on vendor outreach and marketing to critical facilities, clarity on key implementation issues is essential.
- Supply chain risk is best mitigated through clear program expectations and vendor flexibility in design and delivery timelines.