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Dear EUC Working Group,

I appreciate the opportunity to participate in the working group and commend all the participants for their views and contributions. My comments attempt to offer the perspective of Businesses and Industry who operate in Austin.

We support the overall goals of reliability, affordability, equity and decarbonization that is the overall objective of the working group report.

We agree with much of the EUC working group report on the importance of several issues:

(1) Additional and continued focus on Energy Efficiency Programs, particularly those focused on low income groups.
(2) High priority for innovative and expanded Demand Response Programs.
(3) Pursuit of additional transmission capacity into the Austin load zone.
(4) Expansion and development of EV programs.
(5) Deployment of energy storage within the load zone.
(6) The enablement of Power Purchase Agreement (PPA) structures for commercial and industrial sited generation.

The issues where we differ from the majority are listed below:

(1) While we agree with the need for expansion of generation in the Austin load zone we think programs should be more expansive than just Solar and Battery storage. Technologies can be used to address "after dark" or "duck curve" type scenarios should be encouraged. Effective natural gas generation that operates when renewable production is unavailable will allow customers to build microgrids to create reliability solutions, address load zone generation requirements and contribute to decarbonization. Prohibiting Austin energy from purchasing energy from such systems may slow low carbon technology adoption.
(2) Hydrogen is being pursued by the US Department of Energy, many US states, many major industrials and the European Union. While economic and technical issues remain, considerable funding and R&D is ongoing. Austin Energy should pursue these options also or risk being left behind in accessing current and future funding opportunities.
(3) The same points above in (2) also apply to other technologies such as SMR development.

Sincerely,

Jim Stanway