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**DOCKET NO. 40000**  
**PUBLIC UTILITY COMMISSION OF TEXAS**

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<b>COMMISSION PROCEEDING TO ENSURE RESOURCE ADEQUACY IN TEXAS</b>	§ § §	<b>BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS</b>
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**COMMENTS AND REQUEST FOR WORKSHOP  
OF EVALUATING SOLAR POWER GENERATION IN TEXAS**

We are concerned that the Public Utility Commission (“Commission”) has undervalued the feasibility for solar energy to serve as a solution to threatened resource inadequacy in ERCOT. We urge the Commission to give more attention to solar generation as a source of cost-competitive electricity that is available during periods of peak electric demand. Solar generation can reasonably be constructed and deployed more swiftly than other generation resources, and fill in resource gaps during the wait for other generation that requires a greater lead time to get on-line.

OCI Solar Power, LLC, with the support of CPS Energy, will add 400 MWs of solar that will help ERCOT add much needed summer peaking reserves, starting with 41 MWs currently under construction in San Antonio. In addition OCI Solar Power, LLC, is sponsoring the creation of over 800 renewable energy jobs, including construction of a solar panel manufacturing facility in San Antonio.

To maximize the positive economic benefits to Texas while addressing the issue of increasing electricity demand, we feel adding environmentally friendly solar energy is a wise investment. With well developed commercial structures that place value on incremental power supply during peak demand periods without requiring additional demands on increasingly scarce water resources in Texas, consumers, energy providers and ERCOT can address this growing need for capacity through increased solar power. With the abundant solar resource within the state, encouraging solar development makes sense economically on multiple levels, for landowners, businesses and consumers.

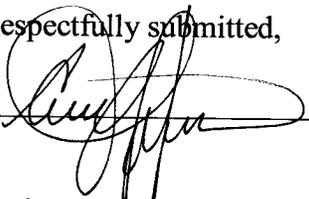
We hope that the Commission will establish a workshop to address the advantages of encouraging available solar technology for ERCOT generation resources. A workshop will provide a forum for stakeholders and leaders in the solar industry to put forward viable solutions that can gain support from investors and consumers alike for mitigating resource adequacy concerns in ERCOT.

The Commission has not given serious consideration to solar energy as a viable source of power to help meet maximum loads on the ERCOT grid. The simple fact is that production pattern of PV solar generation matches closely summer periods of maximum load in ERCOT. PV Solar is a cost-competitive resource that produces its maximum capacity on the same sunny afternoons that give rise to most of the maximum customer demand in ERCOT. These are the same hours that produce high temperatures and high humidity that force de-rating for many gas turbine generators. Moreover, solar generating resources can be built more quickly than other generation and do not suffer from potential fuel price increases, impact of water scarcity, or any carbon controls or taxes.

With continued improvements in the cost and efficiency of solar power, now is the time to take inventory on the vast supply of Texas solar energy. Through innovation and investment from companies like OCI Solar Power, LLC, Texas can prepare for the energy landscape of tomorrow.

**WHEREFORE**, OCI Solar Power, LLC respectfully prays that the commission set up a workshop under a separate docket involving solar resources.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anthony Dorazio', is written over a horizontal line. The signature is stylized and cursive.

By: Anthony Dorazio  
President, OCI Solar Power, LLC