SPAN
Students for Patient Advocacy Nationwide

2644 Clifford St,
Alvin, TX, 77511
www.spanationwide.org

Subject: Amendment Proposal: Strengthen Microgrid Definition in SB 75 / HB 941 to Protect Texas' Energy Leadership

Dear Representative,

We are writing to urgently request your attention to a critical improvement needed in SB 75 / HB 941 regarding the definition of "microgrid."

As microgrids rapidly expand across Texas - supporting critical infrastructure, businesses, and communities - it is vital that our legal standards match the seriousness of this growth. Texas is poised to lead the nation in resilient energy systems. However, unless SB 75 / HB 941 is strengthened, we risk falling behind other states and jeopardizing our grid security, emergency preparedness, and economic competitiveness.

The current definition is dangerously broad:

> (2) "Micro-grid" means a group of interconnected loads and distributed energy resources inside clearly defined electrical boundaries.

This language does **not require** microgrids to autonomously operate during grid outages (islanding). Without a mandate for islanding, non-resilient systems could be labeled as "microgrids," severely undermining public safety and the intent of the legislation.

If we fail to close this loophole, Texas could see widespread adoption of systems that **fail when needed most**, placing our communities, industries, and critical services at unacceptable risk. Other states are moving aggressively to define and enforce resilience standards - we cannot afford to lag behind.

We strongly urge adoption of a stronger definition. We respectfully offer three improved versions for your consideration:

Proposed Revised Version 1:

> (2) "Micro-grid" means a group of interconnected loads and distributed energy resources inside clearly defined electrical boundaries that can operate as a single controllable unit in island mode if needed.

Proposed Revised Version 2:

> (2) "Micro-grid" means a group of interconnected loads and distributed energy resources inside clearly defined electrical boundaries that is capable of operating autonomously ("islanding") from the main electric grid during a power outage, maintaining critical load support for a minimum of 72 consecutive hours without external power supply, and capable of reconnecting to the grid without disruption when grid power is restored.

SPAN
Students for Patient Advocacy Nationwide

2644 Clifford St,
Alvin, TX, 77511
www.spanationwide.org

Proposed Revised Version 3:

(2) "Micro-grid" means a group of interconnected loads and distributed energy resources inside clearly defined electrical boundaries that: (A) is capable of automatic detection of main grid outages and autonomous operation (islanding) without manual intervention;
(B) supports critical infrastructure loads, including at minimum emergency services, communications, water supply, or healthcare functions, for a continuous period of no less than 72 hours under normal and adverse conditions;
(C) includes redundant generation or energy storage resources to ensure continued operation during extended grid outages;
(D) can resynchronize and reconnect to the main electric grid without manual intervention and without disruption to either system;
(E) complies with applicable industry standards for safety, cybersecurity, and interconnection, including but not limited to IEEE 1547.

Why 72 Hours?

Department of Defense microgrid standards (UFC 3-550-04) require systems to operate independently for a minimum of 72 hours - a threshold also reflected in hospital emergency planning. True resilience must cover extended emergencies, not just brief interruptions.

Bottom line:

Without these critical updates, Texas risks opening the door to weak, non-resilient systems masquerading as microgrids, putting public safety and our competitive energy leadership at risk. This definition is not just a technicality - it is foundational to ensuring that Texas becomes a leader, not a follower, in national energy security.

We would be honored to provide any technical resources, model language, or testimony if needed. Should our proposed language or ideas be incorporated, we respectfully request acknowledgement of our contribution.

Thank you for your leadership and for safeguarding Texas' future.

Respectfully,

Vishank Panchbhavi
Email: vishpanchbhavi@gmail.com

Shayan Saqib
Email: Shayansaqib59@gmail.com

Joel Blessan
Email: joelvblessan@gmail.com