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PROJECT NO. 52287

POWER OUTAGE ALERT CRITERIA	§	**PUBLIC UTILITY COMMISSION**
	§	
	§	**OF TEXAS**

ENTERGY TEXAS, INC.'S INITIAL COMMENTS

Entergy Texas, Inc. ("ETI" or the "Company") appreciates the opportunity to submit these Initial Comments regarding the Public Utility Commission of Texas's ("Commission") development of a power outage alert system to be activated when the power supply in this state may be inadequate to meet demand.

1. **Government Code § 411.301(a) states the alert should "be activated when the power supply in this state may be inadequate to meet demand." Should the Public Utility Commission of Texas interpret this to mean that an alert will be activated when there is inadequate *system-wide* power supply to meet system-wide load demand? Should the commission also interpret this to mean that an alert will be activated when there are regional constraints that only restrict power supply to certain regions?**

ETI recommends that the Commission interpret this provision to require that an alert will be activated only when there is inadequate system-wide power supply to meet system-wide load demand. However, the Company recommends that "system-wide" be defined to mean the electric grid within the Electric Reliability Council of Texas ("ERCOT"), the Texas portion of the Midcontinent Independent System Operator, Inc. ("MISO"), the Texas portion of the Southwest Power Pool ("SPP"), or the Texas portion of the Western Electricity Coordination Council ("WECC"). Defining "system-wide" in this manner would advance the policy underlying Senate Bill 3 by addressing the adequacy of power supply in a manner that reflects the transmission topology within the State of Texas.

2. **Government Code § 411.301(b) states, "The criteria must provide for an alert to be regional or statewide." How should the different regions be defined?**

   See Response to 1.

3. **Government Code § 411.301(b) states, "The Public Utility Commission of Texas by rule shall adopt criteria for the content, activation, and termination of the alert..." At what threshold should the commission choose for the alert to be activated? Terminated? What content would be the most helpful for inclusion in the alert?**

With respect to the Texas portion of MISO, ETI recommends that the power outage alert system be activated to coincide with North American Electric Reliability Corporation ("NERC") Energy Emergency Alert (EEA) levels ranging from 1-3, Entergy Load Risk Alert Level (ELRAL) ranging from 0-3, and MISO's Emergency Operations Messaging ranging from Capacity Advisory to Maximum Generation Event (steps 1-5). Attached as Exhibit A to these Initial Comments is a presentation that describes the corresponding alert levels utilized by MISO, NERC, and ETI. ELRAL1, Max Gen 1a, is the step at which ETI may utilize outreach to the news media, social media, and/or voice and text communications to its customers, requesting conservation. The specifics of the particular operating issues, including the anticipated duration and likelihood for escalation, will be evaluated to determine the appropriate public outreach. ELRAL1 is initiated when ETI foresees or is experiencing conditions where, in the event of multiple contingencies (transmission and/or generation), customer load in the affected area(s) may be at risk. At this alert level, all available resources are being utilized to meet customer load in the affected area(s). Non-firm load customers (interruptible/curtailable) may be notified, but may not necessarily be curtailed, depending on conditions. ELRAL2, Max Gen 2c, is the step at which ETI will issue public appeals, using one or more of the mediums discussed above. ELRAL2 is initiated when ETI foresees or is experiencing conditions where in the event of a single contingency, customer load in the affected area(s) may be at risk. At this alert level, ETI foresees or has implemented interruption of Non-Firm Load in the affected area(s). ETI looks forward to working with the Commission and other stakeholders as to the appropriate level to initiate the power outage alert system.

ETI recommends the alert be terminated when the Company notifies the appropriate authority that the conditions leading to the initiation of the power outage alert system no longer persist.

ETI recommends the content of the alert include the following information:

1. The transmission region in Texas that is affected (*i.e.*, ERCOT, MISO, SPP, or WECC).
2. A description of the conditions leading to the alert.
3. A request for conservation or other actions, as appropriate, being requested from the public.

Respectfully Submitted,

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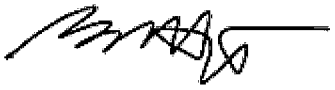
By: 
George G. Hoyt
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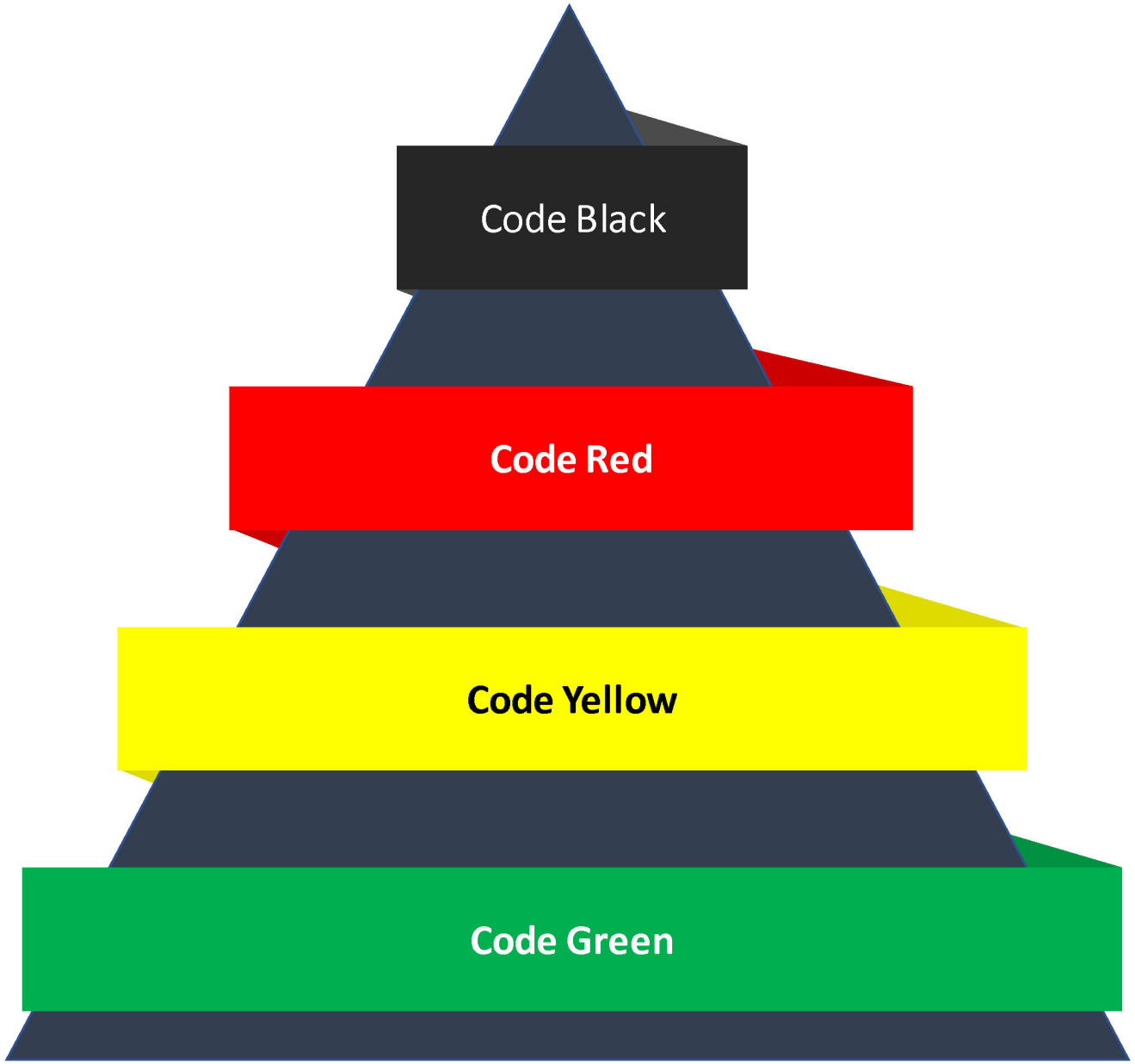
ATTORNEYS FOR ENTERGY TEXAS, INC.

MISO, Entergy, and NERC Alerts



3

MISO: Max Gen Event Step 5
Entergy: ELRAL 3
NERC: EEA 3 – Firm Load Shed

2

MISO: Max Gen Event Step 2a-4b
Entergy: ELRAL 2, Step 2b – Interruptible Curtailment, Step 2c – Public Appeals
NERC: EEA 2 – Issued at MISO Step 2a

1

MISO: Capacity Advisory, Max Gen Alert, Warning, Event Step 1a-1b
Entergy: ELRAL 1, Resources dispatched to emergency range as necessary
NERC: EEA 1 – Issued at MISO Max Gen Step 1b

0

MISO: Normal Operations
Entergy: ELRAL 0
NERC: EEA 0

Alignment of Energy Emergency Alert Levels

owner: NERC reference: EOP-011-1 p.748 scope: governance	owner: TCC reference: SOC-P-152-TOP Rev 01 scope: load pockets	owner: MISO/LBA reference: SPO Capacity Emergency Load Shed Process; MISO SO-P-EOP-00-002 scope: system wide
Alert Level: Description	Alert Level: Description	Alert Level: Description
	ELRAL0 **Normal** This level indicates a normal operation and there is no current risk to customer load.	Conservative Operations - (SO-P-NOP-00-449 Conservative System Operations)
NERC EEA1 All available generation in use.		5.1 **CAPACITY ADVISORY** — Provides advanced notice of forecasted capacity shortage. 4.3.1. **MAX GEN ALERT** — Provides an early alert that system conditions may require the use of MISO's generation Emergency procedures. **LBA**: Initiate Conservative Operations 4.3.2. **MAX GEN WARNING** — MISO foresees or is experiencing conditions where all available economic Resources are committed to meet Load, firm transactions, and reserve requirements, and is concerned about sustaining required Operating Reserves. **LBA**:
	ELRAL1 **Load At Risk** Entergy foresees or is experiencing conditions where in the event of multiple contingencies, customer load in the affected area(s) may be at risk. All available resources are being utilized to meet customer load in the affected area(s). Non-Firm Load customers (interruptible/curtailable) may be notified, but may not necessarily be curtailed, depending on conditions.	5.4 **MAX GEN EVENT** — MISO issues a Max Gen Event due to a shortage of economic Resources. 4.3.3. **1a** — **MISO**: Declare Conservative Operations; **LBA**: initiate **ELRAL1** and start Available Maximum Energy (AME) resources 4.3.4. **1b** — **LBA**: Bring on offline generation. **1** — **TCC**: MISO conference call
NERC EEA2 Load management procedures in effect.	ELRAL 2 **Non-firm load shed, curtailables imminent or in progress** Entergy foresees or is experiencing conditions where in the event of a single contingency, customer load in the affected area(s) may be at risk. Entergy foresees or has implemented interruption of Non-Firm Load in the affected area(s).	4.3.5. **2a** — **LBA**: Initiate **ELRAL2**. **LBA**: Reduce load via LMM-Stage 1; implement LMRs. 4.3.6. **2b** — **MISO-LBA**: Commit EDRs 4.3.7. **2c** — **MISO**: Initiate Emergency energy purchases (SO-IRA-NOP-00-479 Purchasing and Selling Emergency Energy); **LBA**: Issue **Public Appeals**. 4.3.8. **3a** — **LBA**: Initiate relaxation of Environmental Restrictions on power plants. 4.3.9. **3b** — Initiate **ELRAL2** (if not previously done); **LBA**: Reduce load via LMM-Stage2. 4.3.10. **4a/b** — **MISO**: Call reserves from CRSG: **LBA/EMO**: Review offers to ensure all available and emergency resources offered.
NERC EEA3 Firm load interruption imminent or in progress.	ELRAL 3 **Firm load shed, curtailables imminent or in progress** Entergy foresees or has implemented interruption of Firm Load in the affected area(s).	4.3.11. **5** — **MISO**: Set all LMPs at VOLL; **LBA**: Initiate **ELRAL3 and s**hed firm load, file **OE-417**.