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POWER OUTAGE ALERT CRITERIA

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PUBLIC UTILITY COMMISSION  
  
OF TEXAS

AEP Texas Inc. (“AEP Texas”) provides this response to the Public Utility Commission of Texas (“Commission”) Staff’s request for comments to assist Staff in developing criteria for the content, activation, and termination of a power alert system. Senate Bill 3, enacted by the 87<sup>th</sup> Texas Legislature, directs the Commission to participate in a multi-agency effort to develop a power outage alert system to be activated when the power supply in the state may be inadequate to meet demand.

AEP Texas is a transmission and distribution utility (“TDU”) operating in the Electric Reliability Council of Texas (“ERCOT”) region and appreciates the opportunity to provide these responses to the Commission Staff’s request for comments.

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?*

The Commission should interpret Government Code § 411.301(a) to apply when there is inadequate system-wide power supply to meet system-wide load demand and when there are regional constraints that restrict power supply only to certain regions. Although § 411.301(a) is silent regarding alert activation when there are regional constraints that restrict power supply to certain regions, § 411.301(b) directs the Commission to adopt criteria that “provide for an alert to be regional or statewide.”

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?*

**AEP Texas’ Response:**

The Commission could consider several options for defining regions, depending on the target audience and content of the power outage alert message. The Commission could consider all of ERCOT as a region and could use the ERCOT Weather Zones to define smaller geographic regions within ERCOT. ERCOT designates Weather Zones based on the climatological characteristics and similarities within that area or region, and ERCOT has data that cross-references zip codes to ERCOT Weather Zones if there were a need to reach smaller areas of a Weather Zone. Power outage alerts could be activated ERCOT-wide when generation is insufficient to meet load requirements, and by Weather Zone when transmission constraints or other localized conditions prevent an adequate supply of power to a region. The Commission’s criteria could allow targeting power outage alerts to specific counties, particularly when requesting customers to take actions to resolve a localized grid emergency. AEP Texas notes that the Texas Division of Emergency Management districts, and the counties represented in the districts, could also be cross-referenced when determining the most appropriate area to target with a power outage alert.

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?*

**AEP Texas’ Response:**

The Commission should consider tying activation of power outage alerts with the stages of ERCOT’s Energy Emergency Alerts (“EEA”). In this way, the timing and content of ERCOT’s communications and the power outage alerts would be synchronized. The power outage alert could be terminated when the ERCOT system has returned to normal operating conditions.

The content of an alert should clearly and concisely alert the public of the possibility of power outages on either an ERCOT-wide or regional basis. In fact, Government Code § 411.306 requires that the power outage alert “must include a statement that electricity customers may

experience a power outage.” The content of the message should also provide customers with realistic expectations and actionable information they can use to help support the grid and help ensure their safety. Such information could include requesting energy conservation measures, warning of potential rotating outages, and advising of the expected length of the outage, if known. Similarly, customers should be alerted when rotating outages have ended and be informed that if they are still experiencing an outage that an equipment failure may exist on their system or on their utility’s system along with basic information on how to remedy those issues or where to find information on how to remedy those issues.

In addition to the emergency communications provided by these power outage alerts, AEP Texas believes that TDUs play an important role in providing critical and timely information to customers. The Commission should require retail electric providers to provide email addresses, along with customer names, addresses and telephone numbers, to TDUs, so utilities can directly communicate relevant TDU-specific information.

### **III. CONCLUSION**

AEP Texas appreciates the opportunity to provide these comments and looks forward to working with the Commission and other stakeholders to provide additional input in this project.

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RESPECTFULLY SUBMITTED,

/s/ Leila Melhem

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**ON BEHALF OF AEP TEXAS INC.**