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

TEXAS-NEW MEXICO POWER COMPANY (“TNMP”) submits the following response to the request for comments on questions issued by the Staff of the Public Utility Commission of Texas in developing criteria for the content, activation, and termination of a power alert system.

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?

TNMP interprets § 411.301 as intending an alert to be activated for both regional constraints of regional power supply as well as incidents of inadequate system-wide power supply to meet system-wide load demand. Specifically, § 411.301(b) states that the criteria must provide for an alert to be regional or statewide.

TNMP believes ERCOT's existing defined Weather Zones provide an established system for demarking regional alert areas. As ERCOT guides¹ already groups zip codes served within each Weather Zone, the basis for Power Outage Alert system participants to pair those zip codes with new alert regions already exists.

¹ ERCOT Load Profiling Guide, Appendix D – Profile Decision Tree

TEXAS-NEW MEXICO POWER COMPANY'S RESPONSES TO COMMISSION STAFF'S QUESTION FOR COMMENT

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?

TNMP's Response:

TNMP believes alert messaging should be based on the specific situation and constraint. For regional constraints, such messaging is likely to be very incident specific. However, systemwide incidents should align with the stages of ERCOT's Energy Emergency Alerts (EEA) between ERCOT's communications and the power outage alerts. It is important that the alert system also provide communications when an incident is terminated or an EEA-level is decreased. Specifically, messaging terminating an event or a reduction ceasing rotating outages under EEA Level 3 should inform customers to check breakers and contact their electric utility if they are still experiencing power interruption or outage. Such messaging will assist restoration of equipment or other issues not related to either rotating outages or the incident sparking the alert.

CONCLUSION

TNMP appreciates the opportunity to respond to Commission Staff's Questions for comment in this matter.

Respectfully submitted,

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