



## Filing Receipt

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**PUC PROJECT NO. 52287**

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

**COMMENTS OF LCRA AND LCRA TRANSMISSION SERVICES CORPORATION  
ON NEW 16 TAC §25.57 AS APPROVED AT THE  
DECEMBER 16, 2021 OPEN MEETING**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

The Lower Colorado River Authority and LCRA Transmission Services Corporation (collectively, LCRA) respectfully submit the following comments to the Proposal for Publication (PFP) of new 16 Tex. Admin. Code (TAC) § 25.57, as approved at the December 16, 2021 Open Meeting.

**I.      COMMENTS ON PFP**

LCRA appreciates the Commission Staff's work to implement these important provisions of Senate Bill 3. In order to improve clarity and ensure the rule language is consistent with requirements in the ERCOT Protocols and Nodal Operating Guide, LCRA proposes two revisions.

First, to clarify that the rule applies both within ERCOT and in non-ERCOT power regions in Texas, LCRA proposes revisions to subsection (a). As initially drafted, the rule could be interpreted to apply only to ERCOT as an entity, and to non-ERCOT Transmission Services Providers (TSPs). LCRA does not believe this is the Commission's intent, and suggests the following modifications:

- (a)      Purpose and Applicability.** This section establishes criteria for the activation, content, and termination of power outage alerts (POAs) as required by Texas Government Code §411.301(b). This section applies to **POAs issued in** the Electric

Reliability Council of Texas (ERCOT) power region and ~~transmission service providers~~ in power regions in Texas other than the ERCOT power region.

Second, to align the Commission's rule with the manner in which manual load shed instructions are issued, at least with respect to how such instructions are issued in ERCOT, the definition of "load shed instructions" should be revised. Under the ERCOT Protocols, ERCOT is authorized during Energy Emergency Alert (EEA) Level 3 to "direct all TSPs and [Distribution Service Providers (DSPs)] or their agents to shed firm Load, in 100 MW blocks, distributed as documented in the Operating Guides in order to maintain a steady state system frequency at a minimum of 59.91 Hz and to recover 1,000 MW of [Physical Responsive Capability] within 30 minutes."<sup>1</sup> Under the ERCOT Nodal Operating Guide, the "[o]bligation for Load shed is by DSP. Load shedding obligations need to be represented by an Entity with 24x7 operations and Hotline communications with ERCOT and control over breakers."<sup>2</sup> In other words, ERCOT issues the instruction to Transmission Operators, but ultimately the obligation to perform load shed falls on the DSP. In addition, ERCOT is also authorized to instruct TSPs and DSPs to take other actions that reduce electricity usage on the system, but which do not constitute firm load shed (and may not warrant activation of a POA).<sup>3</sup>

To improve clarity and accuracy, LCRA recommends that the Commission revise the definition of "load shed instructions" as follows:

**(b) Definitions.**

- (1) Load shed instructions - Directions given by a reliability coordinator to a transmission service providers, distribution service providers, or their

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<sup>1</sup> ERCOT Nodal Protocols § 6.5.9.4.2(3)(A).

<sup>2</sup> ERCOT Nodal Operating Guide § 4.5.3.4(1).

<sup>3</sup> See *id.* § 4.5.3.1(1)(e).

agents to shed firm load ~~reduce electricity usage along its systems~~ by a described amount to prevent longer and larger outages for an entire power region.

## **II. CONCLUSION AND PRAYER**

LCRA appreciates the Commission's consideration of these comments on proposed new 16 TAC § 25.57.

Respectfully submitted,

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By: \_\_\_\_\_

Emily R. Jolly

**PUC PROJECT NO. 52287**

**POWER OUTAGE ALERT CRITERIA**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**LCRA AND LCRA TSC's EXECUTIVE SUMMARY**

- To clarify that the rule applies both within ERCOT and in non-ERCOT power regions in Texas, LCRA proposes that subsection (a) be revised as follows:

**Purpose and Applicability.** This section establishes criteria for the activation, content, and termination of power outage alerts (POAs) as required by Texas Government Code §411.301(b). This section applies to **POAs issued in** the Electric Reliability Council of Texas (ERCOT) **power region** and ~~transmission service providers~~ in power regions in Texas other than the ERCOT power region.

- To ensure that the rule is consistent with how manual load shed is performed (at least in ERCOT) and is not unintentionally under- or over-inclusive, LCRA recommends that the Commission revise the definition of “load shed instructions” as follows:
  - (1) Load shed instructions - Directions given by a reliability coordinator to ~~a~~ transmission service providers, **distribution service providers, or their agents to shed firm load** ~~reduce electricity usage along its systems~~ by a described amount to prevent longer and larger outages for an entire power region.