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POWER OUTAGE ALERT CRITERIA	§ § §	PUBLIC UTILITY COMMISSION OF TEXAS
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Southwestern Electric Power Company (SWEPCO) timely submits the following comments regarding the Proposal for Publication of new 16 Texas Administrative Code (TAC) § 25.57 relating to Power Outage Alert Criteria filed in this Project on December 17, 2021. SWEPCO appreciates the work of the Public Utility Commission of Texas (Commission) during this rulemaking proceeding and the opportunity to provide comments. As directed in the Proposal for Publication, SWEPCO includes a bulleted executive summary at the beginning of this document.

SWEPCO largely agrees with the Proposal for Publication as written, including the definition and use of the term “system-wide.” SWEPCO provides the following comments regarding the Proposal for Publication. These comments are discussed more fully in section II of this document:

- A. Notification of the Commission: The proposed rule identifies the Electric Reliability Council of Texas as the appropriate party to notify the Commission when conditions warrant a power outage alert. SWEPCO respectfully requests the Commission likewise obtain notification from the entities responsible for the real-time balancing of supply and demand on the bulk power system in other regions of Texas.
- B. Sharing of power outage alert with transmission service provider: The contents of power outage alerts should be shared with utilities to facilitate consistent communication by the State and utilities with customers regarding a service outage.

II. Specific Comments

A. Notification of the Commission

Subsection (d) of the proposed rule requires the Electric Reliability Council of Texas (ERCOT) to notify the Commission when conditions warrant a power outage alert (POA). SWEPCO agrees the natural choice to notify the Commission is the entity responsible for calling a load shed event. In contrast, subsection (e) of the proposed rule would have *electric utilities* notify the Commission when the conditions warranting a POA occur outside of ERCOT. This is a substantial difference. SWEPCO respectfully asks the Commission to obtain notification from the entity responsible for the real-time balancing of supply and demand on the bulk power system, the same as the proposed rule envisions for the ERCOT region. In SWEPCO's case, this is the regional transmission organization (RTO) Southwest Power Pool (SPP).

The RTO has clear and immediate visibility of grid conditions. It is the Balancing Authority and the Reliability Coordinator, which places it in the position of issuing Operating Instructions (*e.g.*, load shed directives) and thus is best positioned to know when such is imminent. Utilities do not have this same visibility. For example, proposed paragraph (c)(3) identifies the expected length of time load shed instructions will be in effect, as a potential criterion for determining whether to issue a POA. And paragraph (f)(2) calls for an explanation of the circumstances surrounding the event. SWEPCO is not a Balancing Authority and simply will not have this information. Furthermore, requests for additional information under subparagraph (e)(4)(A) would ultimately require dialogue with the RTO.

SWEPCO complies with the existing outage notification requirements of the Commission's Substantive Rules within the applicable time frames. However, because of its visibility of the bulk power system, the RTO can inherently provide POA information more timely

than a utility could. Seeking information from utilities for this purpose would introduce unnecessary opportunities for delay, for outdated or incomplete information, for information somehow inconsistent with what the RTO itself would have conveyed, or for conflicting information from multiple electric utilities within the same RTO. Any of this would take time to resolve and require dialogue between the utilities and the Commission, and quite possibly outreach to the RTO.

All of this would serve to delay the State's issuance of a POA. And critically, it would take utility operators away from the task at hand—executing the RTO's load shed directive. Even if no subsequent requests for additional information or clarification were needed, requiring utilities to convey RTO directives to the Commission will occupy the time of utility transmission and distribution dispatch operators. Regardless of what group or department within a utility ultimately communicates with the Commission about the event, the notification and responses to follow-up inquiries would have to originate from them, all while their full attention is urgently needed to execute the load shed directive. When the RTO issues a load shed directive, it is a fast-moving and dynamic event. To maintain the stability of the grid, utilities are required by North American Electric Reliability Corporation (NERC) Reliability Standard TOP-001 to comply with Operating Instructions from the RTO. In a matter of minutes, SWEPCO must identify the circuits that would collectively accomplish the RTO's directive, and de-energize them. Furthermore, the RTO's directive can change without warning while utilities are in the process of responding, necessitating a different amount of megawatts to be shed and a new identification of circuits. As soon as SWEPCO has accomplished the RTO's directive, its operators then identify circuits with which to replace the de-energized circuits for the purpose of rotating the outages around the service area. Finally, when the directive is recalled, SWEPCO is restoring service to customers as promptly as

possible and mitigating challenges such as cold load pickup. In such a dynamic and time-constrained environment, every moment someone in a utility control room spends away from the immediate task (executing the load shed directive) meaningfully increases the risk of improper or non-timely fulfillment of the directive.

The intensity of activity and internal communication that is occurring, beginning immediately at the outset of an event, is exceptional. Additionally, SWEPCO's operators are communicating with the RTO to ensure clear understanding and timely performance. The stringency of NERC requirements, for example utilizing three-way or repeat-back communication to confirm instructions and actions, does not leave time for cause analysis or dissemination of information about the event. To ensure federal visibility of the event, utilities are required to report load shed events exceeding 100 megawatts to NERC and the U.S. Department of Energy (DOE) within one hour of the event using Form DOE-417 or Form EOP-004-Attachment 2. This period of time affords the utility sufficient opportunity to respond to the event immediately when it occurs, and then promptly inform NERC and DOE. For implementation efficiency, these forms were designed to contain identical information and are submitted simultaneously to both NERC and DOE. If it would satisfy the Commission's needs, providing a copy to the Commission at that same time would minimize the administrative impact to SWEPCO and perhaps all non-ERCOT entities.

SPP recently initiated a new Grid Notice email distribution, by which it notifies all subscribers of grid condition changes. These emails explain the grid status using text and graphics. The Grid Notice is a timely and reliable tool by which the Commission can become aware of grid conditions warranting a POA. The email also includes a hyperlink to SPP's Grid Conditions page, which is up-to-date on SPP's website and presents SPP's current grid status. SWEPCO has

attached a detailed description and example of the Grid Notice to these comments. Additionally, the Commission has an established relationship and regular contact with SPP, by virtue of its seat on the Regional State Committee and Staff's active monitoring of SPP activity. There are thus numerous avenues of communication by which the RTO—who monitors the bulk power system and issues the directives that would warrant a POA—could notify the Commission, just as is envisioned for POAs in the ERCOT region.

B. Sharing of power outage alert with transmission service provider

It is common practice for SWEPCO and other utilities to communicate with their customers during a widespread service outage. Various mediums are utilized, for example call centers, customer account management and external affairs personnel, social media, television and print media outlets, and the company website. To avoid customer confusion, SWEPCO strives to ensure a consistent and complete message when communicating with its customers in various forms. The POAs created by the Legislature in Senate Bill 3 are a new form of communication to electric utility customers by the Commission and the Texas Division of Emergency Management. If a power outage alert is to be issued, it will be important for SWEPCO to immediately be aware of its contents. This will facilitate consistent communication by utilities and the State with customers regarding the service outage. Such a requirement, for the contents of the POA to be shared as soon as practicable with utilities, preferably simultaneous with or even prior to issuance to the public, could be added to proposed subsection (c):

(c)(4) Commission staff shall distribute all power outage alerts, including termination of them, to relevant transmission service providers as soon as practicable.

III. Conclusion

SWEPCO appreciates the opportunity to comment on the Proposal for Publication and is available to respond to questions.

Respectfully submitted,

/s/ Leila Melhem

AMERICAN ELECTRIC POWER SERVICE
CORPORATION

Leila Melhem
State Bar No. 24083492
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3321
Facsimile: (512) 481-4591
Email: lmelhem@aep.com

ON BEHALF OF SOUTHWESTERN
ELECTRIC POWER COMPANY

From: bounce-101485-183395@spplist.spp.org <bounce-101485-183395@spplist.spp.org> **On Behalf Of** Southwest Power Pool
Sent: Wednesday, December 15, 2021 3:26 PM
To: Markets and Operations Policy Committee <mopc@spplist.spp.org>
Subject: [EXTERNAL] **External Email** SPP Grid Notices: Sign up to receive emails re: changing grid conditions

This message is being sent to Southwest Power Pool's (SPP) stakeholders and news release subscribers.

As SPP announced In July 2021, we have a new tool intended to help anyone interested to stay apprised of changing grid conditions that affect our footprint. This includes declarations of weather and resource alerts, conservative operations and energy emergency alerts (EEAs).

We'll send emails that summarize changing grid conditions via the new SPP Grid Notice exploder. To subscribe to receive these updates:

1. Once logged in to SPP.org, click the "Hi, [your name]" button in the top right of the screen to update your account preferences. (You'll need to create an account if you don't already have one.)
2. In the list of available exploders, check the box next to the one named "Grid Notice."
3. Click the "Submit" button at the bottom of the form to save your changes.

Once your subscription is processed, within 24 hours, you'll begin to receive all Grid Notices sent by SPP. You can always unsubscribe from this and other exploder lists on the same account management page linked above.

We are requesting entities operating behind-the-meter generation register for Grid Notices to ensure awareness of EEA conditions. Entities operating behind-the-meter generation should be prepared to contact the SPP Balancing Authority during an EEA Level 1 to communicate capabilities and availability. During EEA Level 2 and EEA Level 3, these entities are expected to have behind-the-meter generation online, if available.

SPP asks that entities with nonfirm load-shed capabilities register for Grid Notices to ensure awareness of EEA 2 and EEA 3 conditions. Entities with nonfirm load shed capabilities can expect curtailments to be implemented by their transmission operator during EEA 2 and EEA 3 conditions. Non-firm load shed is described in the SPP BA Emergency Operating Plan section 7.3.2.2 as:

- Reducing load through use of public appeals.
- Implementing voltage reduction.
- Interrupting interruptible load, curtailable load and demand response.
- Contacting governmental agencies, which are their customers, to reduce their demand.
- Reducing internal utility energy use.
- Invoking any other load reduction capability available up to but excluding firm load curtailment.

Grid Notices will define current grid conditions and indicate, through text and/or graphics, their relative level of severity. We'll strive to provide as much context and information as possible, though reliability events can occur without much warning and evolve quickly, meaning early notifications may lack much

specificity. These messages will be sent *in addition to* official communications already issued by SPP's operators and other business units.

If you already receive Grid Notice exploder notifications, please forward this email to entities operating behind-the-meter generation and entities with non-firm load shed capabilities.

SPP believes in continuous improvement, and we're looking forward to improved communication with our stakeholders about the conditions of the grid in our footprint.

If you have any questions or issues creating an account, please email the SPP communications department at communication@spp.org.

This email and any attachments are for the sole use of the intended recipient(s) and may contain confidential information. If you receive this email in error, please notify the sender, delete the original and all copies of the email and destroy any other hard copies of it.

You are currently subscribed to the list titled mopc as: [REDACTED]

To manage your exploder subscriptions [log into SPP.org](#), [edit your account](#) and use the Exploder Lists field to indicate the lists to which you would like to be subscribed or unsubscribed.

Replies to this exploder list are disabled. If you have a message you would like to send, please contact the staff secretary.

From: bounce-101646-210313@spplist.spp.org <bounce-101646-210313@spplist.spp.org> **On Behalf Of** Southwest Power Pool

Sent: Thursday, December 30, 2021 12:31 PM

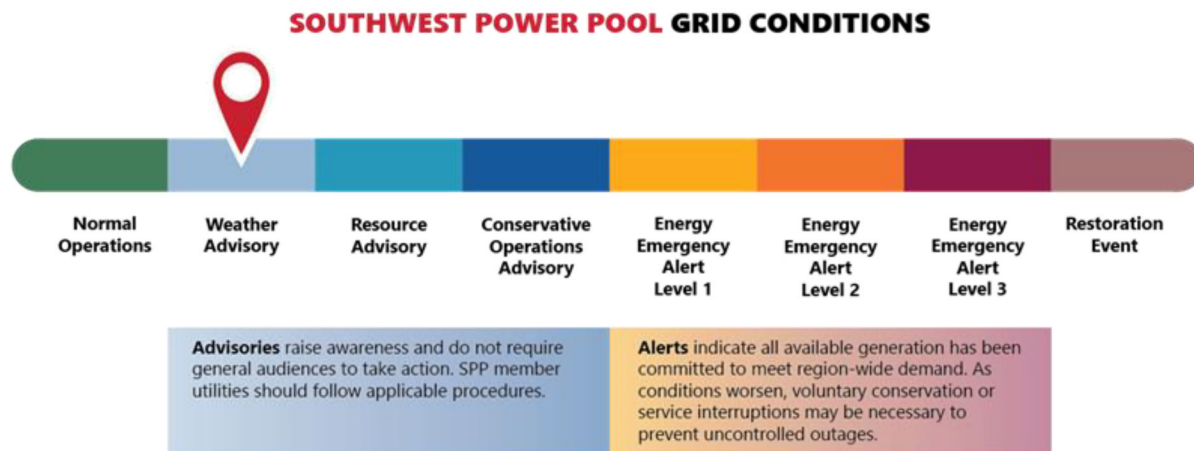
To: SPP Grid Notice <gridnotice@spplist.spp.org>

Subject: [EXTERNAL] **External Email** Grid Notice: SPP issuing Cold Weather Advisory effective 12:00 a.m. Saturday, January 1, 2022, through 12:00 p.m. Sunday, January 2, 2022

SPP is issuing a Cold Weather Advisory effective 12:00 a.m. on Saturday, January 1, 2022, through 12:00 p.m. on Sunday, January 2, 2022.

SPP issues Weather Advisories when extreme weather is expected in SPP's reliability coordination service territory. Weather Advisories do not require utilities or the public across our 14-state region to conserve energy. Individuals should contact their local utility for details specific to their area.

The following chart shows the relative severity of the Cold Weather Advisory in effect from 12:00 a.m. on Saturday, January 1, 2022, through 12:00 p.m. on Sunday, January 2, 2022.



Remember, you can also check the general status of SPP's regional system on the [Current Grid Conditions page of SPP.org](#).

This email and any attachments are for the sole use of the intended recipient(s) and may contain confidential information. If you receive this email in error, please notify the sender, delete the original and all copies of the email and destroy any other hard copies of it.

You are currently subscribed to the list titled gridnotice as: [REDACTED]

To manage your exploder subscriptions [log into SPP.org](#), [edit your account](#) and use the Exploder Lists field to indicate the lists to which you would like to be subscribed or unsubscribed.

Replies to this exploder list are disabled. If you have a message you would like to send, please contact the list administrator.