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**PROJECT NO. 52287**

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

**COMMENTS OF TEXAS ELECTRIC COOPERATIVES, INC.**

Texas Electric Cooperatives, Inc. (TEC) respectfully submits these comments in response to the Public Utility Commission of Texas (Commission) Proposal for Publication (PFP) of new 16 TAC §25.57, as approved at the December 16, 2021 Open Meeting. TEC is the statewide association of electric cooperatives operating in Texas, representing its members except as their interests may be separately represented.<sup>1</sup>

TEC's below comments recommend: (1) refinements to the definition of load shed instructions, (2) modifications to ERCOT notice requirements, and (3) changes to the notification requirements for transmission service providers (TSPs) operating outside of ERCOT.

**I. Simplify the Definition of Load Shed Instructions**

The PFP proposes in section (b)(1) a new definition for load shed instructions. This definition directly informs the circumstances under which the Commission may issue a Power Outage Alert (POA) – under new section (c), the “issuance of a POA may be recommended when load shed instructions have been issued.” TEC interprets the proposed definition of load shed instructions to relate to instances where ERCOT or another reliability coordinator instructs utilities to interrupt service to balance supply and demand on a system-wide basis (an Energy Emergency Alert 3 (EEA 3)).<sup>2</sup> As proposed in the PFP, the term may not include all instances of system-wide load shed, as controlled outages may not in all cases prevent “longer and larger outages” from occurring. TEC recommends the definition be modified to improve clarity and ensure that POAs

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<sup>1</sup> TEC's 75 members include distribution cooperatives that provide retail electric utility service to approximately 4,000,000 consumers in statutorily authorized service areas that encompass more than half of the total area of the state. TEC's G&T members generally acquire generation resources and power supply for their member distribution cooperatives and deliver electricity to them at wholesale.

<sup>2</sup> An EEA 3 is declared if operating reserves cannot be maintained above 1,375 MW. If conditions do not improve, continue to deteriorate, or operating reserves drop below 1,000 MW and are not expected to recover within 30 minutes, ERCOT will order transmission companies to implement rotating outages.  
[http://www.ercot.com/content/wcm/lists/164134/EEA\\_OnePager\\_FINAL.PDF](http://www.ercot.com/content/wcm/lists/164134/EEA_OnePager_FINAL.PDF).

may be issued when load shed instructions are provided to utilities. TEC's recommended changes are as follows:

- (1) Load shed instructions – Directions given by a reliability coordinator to a transmission service provider to reduce load to balance supply and demand on a system-wide basis electricity usage along its systems by a described amount to prevent longer and larger outages for an entire power region.

## II. Refine ERCOT Notice Requirements

TEC believes POAs should be deployed only when load shed instructions are provided to utilities or the Commission has a high degree of confidence that system-wide load shed will occur. TEC recommends against using the alert system for system conditions other than imminent ERCOT-directed load shed, such as instances where ERCOT may issue a conservation alert. To ensure it has the intended effect that is not diluted by repeated or unnecessary use, the power outage alert system should be reserved only for the most serious system conditions.

In section (d)(1)(A)-(B), the PFP requires ERCOT to notify the Commission when ERCOT's forecasts indicate generation supply may be insufficient to meet demand within the next 48 hours, or when ERCOT issues or is preparing to issue load shed instructions. TEC believes a 48-hour timeline may be too long, because in most cases either the market will respond to a potential supply shortfall or ERCOT will issue Reliability Unit Commitment (RUC) instructions or take other reliability actions to manage the shortfall. In these cases, deploying a POA would not serve its intended public service function because the supply insufficiency would otherwise be addressed through operational actions.

TEC therefore suggests that an alert be deployed when ERCOT has a high degree of certainty that it will issue load shed instructions within the next 24 hours. TEC recommends that ERCOT provide notice to the Commission in the following circumstances:

- (A) ERCOT's has a high degree of certainty that it will issue load shed instructions within the next 24 hours; or forecasts indicate system-wide generation supply may be insufficient to meet demand within the next 48 hours; or
- (B) ERCOT issues or prepares to issue load shed instructions.

### III. Clarification of Notice Requirements for TSPs Located Outside of ERCOT

Section (e) of the PFP describes notifications that TSPs operating in a power region other than ERCOT must provide to the Commission when they receive load shed instructions applicable to Texas. TEC asserts that it would be simpler to direct the reliability coordinators themselves to notify the Commission in the rare instances when they issue load shed instructions that pertain to Texas, and TEC asks that the PFP be modified accordingly.

In the alternative, if the Commission believes it must direct TSPs to provide notice, then these new requirements should be limited in scope to only reflect the information the TSP can confidently provide. The final sentence in section (e)(3), which requires the TSP to provide “any available information regarding power outages,” is too broad in scope and should be deleted, because “any available information” could include vast amounts of data or information in the public domain that is available to TSP personnel. Deleting this sentence would also avoid duplication between the requirements in sections (e)(2)(B) and (e)(3), which both refer to an expectation of power restoration. TEC’s edit is as follows:

- (3) The transmission service provider must notify the commission when the applicable reliability coordinator has recalled the load shed instructions. ~~The transmission service provider’s notice must include any available information regarding power outages and the expectation for power restoration within its service territory.~~

In addition to appropriately limiting the scope of information provided by a TSP in its notice, TEC also recommends the Commission provide more clarity on the procedures to provide notifications, described in section (e)(4). Rather than requiring that TSPs create a new procedure, TEC asks the Commission to provide guidance by establishing the procedures. A template form that could be sent by email would accomplish the Commission’s objectives of receiving consistent and standardized information regarding load shed instructions outside of ERCOT. TEC’s edits to this provision are as follows:

- (4) The commission shall prescribe a load shed instruction notification form for use by transmission service providers operating in power regions other than ERCOT. The form may be submitted by electronic mail to the commission. ~~A transmission service provider~~

~~covered by the subsection must establish a procedure, in consultation with commission staff, to provide the commission with notifications required under this subsection.~~

#### **IV. Conclusion**

TEC thanks the Commission and Staff for the opportunity to participate in this project. TEC is available to provide any additional information that may be helpful to the Commission.

Dated: January 11, 2022

Respectfully submitted,

*/s/JuliaHarvey*\_\_\_\_\_

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*Project No. 52287 – Power Outage Alert Criteria*

**Texas Electric Cooperatives, Inc. (TEC)  
Executive Summary of Comments**

**Definition of Load Shed Instructions** – TEC suggests refinements to simplify the definition of load shed instructions to ensure that the Commission is notified of all instances of system-wide load shed.

**ERCOT Notice Requirements** – ERCOT should provide notice to the Commission in anticipation of issuing load shed instructions when there is a high degree of confidence that load shed will occur. A 48-hour notice period in anticipation of load shed may be too long, because the market will respond to forecast supply shortfalls or ERCOT may deploy other reliability tools. TEC recommends a 24-hour notice period be adopted.

**Notice Requirements for TSPs Outside of ERCOT** – Rather than requiring that TSPs outside of ERCOT notice the Commission when they receive load shed instructions from a reliability coordinator, TEC recommends the relevant reliability coordinator that issues these instructions provide that information to the Commission.

Should the Commission require TSPs to provide notices, instead of requiring the TSP provide “any available information about power outages,” TEC asks that the contents of the notice be limited to information the TSPs can confidently provide.

**Procedures to Provide Notices for TSPs Outside of ERCOT** – TEC asks that the Commission specify the procedures for providing notice in the rule and recommends that the Commission adopt a standard load shed instruction notification form that may be submitted by electronic mail.