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POWER OUTAGE ALERT CRITERIA

**PUBLIC UTILITY COMMISSION

OF TEXAS**

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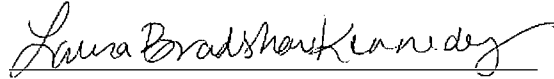
Section (c) – ETI recommends that the language in section (c) be revised to clarify that the Commission may recommend the issuance of a power outage alert based on information received from ERCOT *or* transmission service providers in power regions other than ERCOT. This would avoid the implication that the Commission may recommend the issuance of a power outage alert only when based on information received from ERCOT *and* transmission service providers in power regions other than ERCOT. Circumstances could arise where there is a need for the issuance of a power outage alert for events transpiring in ERCOT, but not in other power regions in the state or vice versa.

Subsection (e)(4)

The messaging to the public and governmental officials during circumstances when a load shed event is imminent or has been called should be timely and not confusing. This will require close coordination with all entities involved along with the Commission, especially in areas where there are overlapping power regions. ETI supports the language in subsection (e)(4) that provides an avenue for transmission service providers to work with Commission Staff to establish a procedure for the provision of the notifications required under the proposed rule. This language provides flexibility to create a notification procedure that fits the specific circumstances of each utility. ETI looks forward to working with the Commission Staff on the processes for meaningful public messaging.

Dated: January 11, 2022

Respectfully submitted,

A handwritten signature in cursive script, reading "Laura Bradshaw Kennedy", written over a horizontal line.

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ATTORNEYS FOR ENTERGY TEXAS, INC.

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- ETI would like to thank Commission Staff and the Commission for the work done to draft a new rule that addresses the development of a power outage alert system to be activated when the power supply in this state may be inadequate to meet demand. ETI appreciates the Commission's consideration of the Initial Comments that ETI filed in this proceeding in response to Commission Staff's Request for Comments. In the Proposal for Publication, the Commission requested specific comments regarding the costs associated with, and benefits that will be gained by, implementation of the proposed rule.² The requirements of the proposed rule that apply to transmission service providers in power regions other than ERCOT encapsulate notifications that ETI would provide to the Commission during load shed events or when load shed may be imminent even without the rule. However, ETI supports the benefit gained by the Commission's effort to formalize such procedures that will support the Commission's obligations under Tex. Gov't. Code § 411.301(b).
- **Section (c):** ETI recommends that the language in section (c) be revised to clarify that the Commission may recommend the issuance of a power outage alert based on information received from ERCOT *or* transmission service providers in power regions other than ERCOT. This would avoid the implication that the Commission may recommend the issuance of a power outage alert only when based on information received from ERCOT *and* transmission service providers in power regions other than ERCOT. Circumstances could arise where there is a need for

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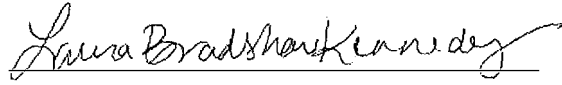
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ATTORNEYS FOR ENTERGY TEXAS, INC.

PROJECT NO. 52287

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ENTERGY TEXAS, INC.'S EXECUTIVE SUMMARY

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² Proposal for Publication of New 16 TAC § 25.57 as Approved at the December 16, 2021 Open Meeting at 4 (Dec. 17, 2021).

the issuance of a power outage alert for events transpiring in ERCOT, but not in other power regions in the state or vice versa.

- **Subsection (e)(4):** The messaging to the public and governmental officials during circumstances when a load shed event is imminent or has been called should be timely and not confusing. This will require close coordination with all entities involved along with the Commission, especially in areas where there are overlapping power regions. ETI supports the language in subsection (e)(4) that provides an avenue for transmission service providers to work with Commission Staff to establish a procedure for the provision of the notifications required under the proposed rule. This language provides flexibility to create a notification procedure that fits the specific circumstances of each utility. ETI looks forward to working with the Commission Staff on the processes for meaningful public messaging.