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#### PROJECT NO. 52287

# POWER OUTAGE ALERT CRITERIA § § §

# PUBLIC UTILITY COMMISSION OF TEXAS

## OFFICE OF PUBLIC UTILITY COUNSEL'S COMMENTS ON COMMISSION'S PROPOSAL FOR PUBLICATION

The Office of Public Utility Counsel ("OPUC") respectfully submits these comments in response to the Public Utility Commission of Texas's ("Commission") Proposal for Publication ("PFP") regarding Power Outage Alert Criteria, filed on December 17<sup>th</sup>, 2021.<sup>1</sup> The PFP implements power outage alert ("POA") criteria as required by Tex. Gov't Code § 411.301(b).<sup>2</sup> OPUC appreciates the efforts of the Commission and Commission Staff to effectively implement a new alert system for power outages. OPUC believes that effective communication with the public is essential to help effectuate proper preparation and response to large scale outage events. OPUC offers the following recommendation: the Commission should notify OPUC when a POA is issued.

#### I. NOTICE TO OPUC WHEN A POWER OUTAGE ALERT IS ISSUED

OPUC acts as the statutory representative for residential and small commercial consumers.<sup>3</sup> As part of OPUC's mission, OPUC maintains an active website and social media presence to reach out and communicate with consumers.<sup>4</sup> Proposed 16 Texas Administrative Code ("TAC") § 25.57(c) gives the Commission various options regarding how to notify the public in conjunction with or in lieu of the issuance of a POA.<sup>5</sup> OPUC respectfully requests to be notified when the Commission takes any action under proposed 16 TAC § 25.57(c) to issue a POA or issue

<sup>5</sup> PFP at 5 - 6.

<sup>&</sup>lt;sup>1</sup> Proposal For Publication of New 16 TAC § 25.57 as Approved at the December 16, 2021 Open Meeting (Dec. 17, 2021) ("PFP").

<sup>&</sup>lt;sup>2</sup> Tex. Gov't Code § 411.301 (b).

<sup>&</sup>lt;sup>3</sup> Tex. Util. Code § 13.001. ("The independent office of public utility counsel represents the interests of residential and small commercial consumers.")

<sup>&</sup>lt;sup>4</sup> https://www.opuc.texas.gov/.

a notification in lieu of a POA. OPUC believes that having this information readily available will enhance the agency's ability to respond to consumer concerns and provide necessary information regarding impending power outages. OPUC recommends the addition of the following to proposed16 TAC § 25.57) as follows:

# (c) Issuance of a POA.

(4) If the Commission takes action under (c)(1) or (c)(2), the Commission shall notify the Office of Public Utility Counsel of the action taken and any underlying information included within the notice.

# (d) POA for the ERCOT power region.

- (5) The commission may:
  - (E) In conjunction with or as an alternative to recommending the issuance of a POA, disseminate information by contacting the media, posting on social media, notifying the Office of Public Utility Counsel and other government officials, or via other available means of communication.

# (e) POA for power regions other than ERCOT.

- (5) The commission may:
  - (E) In conjunction with or as an alternative to recommending the issuance of a POA, disseminate information by contacting the media, posting on social media, notifying the Office of Public Utility Counsel and other government officials, or via other available means of communication.

# II. CONCLUSION

OPUC appreciates the opportunity to provide these comments on the Power Outage Alert Criteria PFP and looks forward to working with Commission Staff and other stakeholders in this project. Date: January 11, 2022

Respectfully submitted,

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