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PROJECT NO. 52287

POWER OUTAGE ALERT CRITERIA

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**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) Staff's Request for Comments on Power Outage Alert Criteria filed in Project No. 52287 on July 30, 2021. TEC is the statewide association of electric cooperatives operating in Texas, representing its members except as their interests may be separately represented.¹

During Winter Storm Uri, electric cooperatives used all means available to communicate consistently and accurately with their members, and will continue to do so. In a post-winter-storm study conducted by the University of Houston's Hobby School of Public Affairs, electric cooperatives scored significantly higher than other types of utilities in terms of overall job performance during the storm, including communication with the public.² Consistent with keeping members well-informed, electric cooperatives have developed and will continue to develop emergency alert systems.

In conjunction with its members efforts in this area, TEC supports the development of a power outage alert system by the Commission and other relevant state agencies that is used in appropriate circumstances on a statewide or system-wide basis.

I. Content of the Power Outage Alert

Regarding the content of the power outage alert issued by the state, TEC recommends that the alert include the following information:

¹ 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.

² *Local Electric Utility Provider Performance During the 2021 Winter Storm*, University of Houston, Hobby School of Public Affairs, at 7.

- A statement that the customer may experience a power outage because of an energy emergency (*see* Tex. Gov't Code § 411.306);
- An expected duration of the emergency based on information provided by ERCOT; and
- Direction that the customer call 911 for immediate assistance.

II. Activation and Termination of the Power Outage Alert

TEC expects a strong public response when power outage alerts are issued through the state's alert system – the recent experience of Winter Storm Uri will be a vivid memory for many consumers. TEC believes state-sanctioned alerts regarding power supply shortages will carry great weight and prompt many citizens to take action to protect themselves and their families. To avoid unnecessary public alarm, the alert system should be used sparingly and only when load shed is imminent. TEC suggests that an alert be issued when ERCOT has a high degree of certainty that it will enter EEA3 and then terminate when ERCOT exits EEA3 and has the expectation that ending the alert will not result in the system re-entering EEA3.³

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. The alert should not supplement ERCOT and local utility's communication efforts during more routine grid conditions, but should be deployed after other communications efforts have commenced and when load shed will occur with a high degree of certainty. 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.

III. Regional or Statewide Alerts

TEC interprets the relevant provision of SB 3 (Tex. Gov't Code § 411.302, regarding alerts issued on a *statewide or regional* basis) to mean statewide or specific to the ERCOT power region. During an ERCOT-specific event, assuming alerts can be limited to areas within the boundaries of the ERCOT power region, alerts should be issued to end users in the ERCOT region. However, when the ERCOT power region experiences an EEA3 event, it is likely that areas outside of

³ An EEA3 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.

ERCOT will also experience supply shortages. The Texas Department of Public Safety (DPS) or the Commission could coordinate with representatives in the adjacent power regions to determine whether the alert should be issued on a state-wide basis or be limited to the ERCOT power region as the situation dictates. If alerts cannot feasibly be limited to areas within the boundaries of the ERCOT region, TEC recommends the alert be issued statewide.

While TEC interprets the regional alert described in SB 3 to refer to the ERCOT power region, the Commission may consider whether the alert could be targeted to subregions of ERCOT for use during regional load shed. Regional load shed may occur when ERCOT issues a transmission emergency. For example, on September 1, 2020, ERCOT issued a transmission emergency for certain areas in the Rio Grande Valley. In these circumstances, a localized alert applicable to the area experiencing load shed would be more appropriate than an ERCOT-wide or statewide alert. While DPS is equipped to issue alerts for specific geographic regions,⁴ it is unclear to TEC whether the Department is currently capable of tailoring an alert to the appropriate end users on a local basis. As a result, TEC suggests that the Commission consult with DPS and ERCOT to determine if an adequate sub-regional alert could be implemented. Until an effective localized alert framework is developed, TEC recommends that the alert system be set up on a state-wide basis or, if possible, limited to the ERCOT power region during ERCOT-specific events.

IV. Conclusion

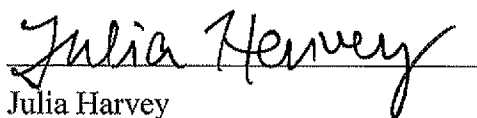
The implementation of an energy alert system will provide critical and necessary information to the public should an energy emergency occur. As described above, to preserve its effectiveness TEC recommends the alert system only be activated when the system operator determines load shed is imminent. Further, the outage alert system should be designed for implementation on a statewide basis and, if possible, on a regional ERCOT-wide basis. If a localized alert system is feasible, TEC recommends localized alerts be issued should the system operator ask for load shed in a local area.

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.

⁴ See Texas Regional Alert Programs Map, Available at:

Dated: August 13, 2021

Respectfully submitted,

A handwritten signature in cursive script, reading "Julia Harvey", written over a horizontal line.

Julia Harvey

Vice President

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