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

**ONCOR ELECTRIC DELIVERY COMPANY LLC'S
RESPONSE TO COMMISSION STAFF'S QUESTIONS FOR COMMENT**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COMES NOW Oncor Electric Delivery Company LLC ("Oncor") and files this its Response to Commission Staff's Questions for Comment, and would respectfully show the following.

I. INTRODUCTION

Oncor appreciates the opportunity to provide these responses to Commission Staff's Questions for Comment. Oncor is a transmission and distribution utility ("TDU") operating within the electric grid operated by the Electric Reliability Council of Texas ("ERCOT") and, thus, this Response is tailored to the ERCOT area of Texas.

II. RESPONSES TO QUESTIONS FOR COMMENT

1. *Government Code § 411.301(a) states the alert should "be activated when the power supply in this state may be inadequate to meet demand." Should the Public Utility Commission of Texas interpret this to mean that an alert will be activated when there is inadequate system-wide power supply to meet system-wide load demand? Should the commission also interpret this to mean that an alert will be activated when there are regional constraints that only restrict power supply to certain regions?*

Response:

The Commission should interpret Government Code §411.301(a) to apply when there is inadequate system-wide power supply to meet system-wide load demand, as well as when there are regional constraints that only restrict power supply to certain regions. The ERCOT grid represents about 90% of the state's load. Generation resources and load are interconnected within ERCOT on a single transmission grid. Generation that is insufficient to meet load requirements anywhere on the ERCOT grid can affect the entire grid. Evidence of this was clearly seen during Winter Storm Uri. This is why ERCOT's Energy Emergency Alert ("EEA") procedures are based on inadequate system-wide operating reserves. Therefore, any power outage alert system must be capable of being activated on an ERCOT-wide basis. Additionally, transmission constraints may affect regional areas of the ERCOT grid. While generation on the grid may be adequate to meet

system-wide load, transmission constraints may limit the amount of power that can flow to a certain area or region of the ERCOT grid. If load is extremely high in that area, possibly due to extreme weather conditions in just part of the state or the loss of a power plant on the constrained side of the transmission line, the ERCOT grid may not be capable of providing adequate power to that area of the grid. This type of constraint has occurred in the Rio Grande Valley, as was discussed at the Commission Workshop held on July 25, 2021. In these cases, the state would be best served for the power outage alert system to be capable of being activated both on a regional basis in addition to a state-wide basis.

2. ***Government Code §411.301(b) states, “The criteria must provide for an alert to be regional or statewide.” How should the different regions be defined?***

Response:

Since weather is likely the greatest single variable leading to power emergencies, ERCOT’s already-established Weather Zones are a good system for defining regional alert areas. As defined in the ERCOT Nodal Protocols, a Weather Zone is “a geographic region designated by ERCOT in which climatological characteristics are similar for all areas within such region.” The ERCOT Load Profiling Guide, Appendix D – Profile Decision Tree, cross references zip codes served within ERCOT’s grid to the appropriate Weather Zone. Therefore, any public or private entity that participates in the Power Outage Alert system could create consistent alert regions by simply pairing zip codes with the ERCOT Weather Zones. Additionally, the capability to tailor alerts down to the County level would provide a more precise and targeted communication option which would be beneficial in some cases.

3. ***Government Code §411.301(b) states “The Public Utility Commission of Texas by rule shall adopt criteria for the content, activation, and termination of the alert.” At what threshold should the commission choose for the alert to be activated? Terminated? What content would be the most helpful for inclusion in the alert?***

Response:

For ERCOT system-wide events, if ERCOT declares an EEA Level 1 (operating reserves drop below 2,300 MW and are not expected to recover within 30 minutes), the Power Outage Alert system should be activated, and an alert should be broadcast via the Power Outage Alert system requesting energy conservation measures be employed across the state. If ERCOT declares an EEA Level 2 (operating reserves are less than 1,750 MW and are not expected to recover within

30 minutes,) an alert should be broadcast reiterating the need to conserve energy and letting consumers know of the potential for rotating outages. When ERCOT declares an EEA Level 3 and also orders transmission companies to implement rotating outages, an alert should be broadcast. This alert would let consumers know both that rotating outages have started and what they may expect in terms of power outage duration and timing. Frequent and realistic expectations must be conveyed to the consumer. In all cases, regardless of the communication method or communication source, it is important that all communication be coordinated and messaging consistent. Once ERCOT has exited an EEA level, a message should be broadcast. For instance, after ERCOT has exited EEA3 and all rotating outages have ceased, a customer would know that if they are still without power that an equipment problem exists, either on the utility system or on their own system. The customer would be informed to please check breakers and contact their electric utility. The final message would be that ERCOT is no longer having a shortage of electricity and that all alerts have been terminated.

Regional events are different from system-wide events, and alerts likely will not be as straightforward or pre-planned since the event will vary based on the specific situation and regional constraint. A process that identifies the situation, impacted ERCOT Weather Zones/Counties, and communicates the appropriate message(s) should be developed. At a minimum, consideration should be given to utilizing ERCOT's Listserv messaging service to alert market participants of regional events.

III. OTHER INSIGHTS AND CONTRIBUTIONS ON HOW TO DESIGN THIS SYSTEM

During events that affect large numbers of customers, like Winter Storm Uri, Oncor utilizes several different avenues to communicate outage information to our customers. These include social media, website messaging, storm map banners and upfront messaging on our interactive voice response system. In addition to these tools, Oncor offers customers a free service called *My Oncor Alerts*. *My Oncor Alerts* proactively notifies customers when their power is out and provides an estimated time of restoration, if available. Customers also receive information about temporary disconnect and reconnect communications and scheduling. Customers may choose to receive alerts using one or more communication channels, including text, email or voice messaging. *My Oncor Alerts* has the highest customer satisfaction rate of any of Oncor's communication channels. *My Oncor Alerts*, in addition to the company's *MyOncor* app (which provides real-time information about power outages and historical outage information), paired

with the state's Power Outage Alert system could prove useful in communicating with the public during power shortage events.

One shortcoming of the competitive structure of the ERCOT market, however, is that the TDUs are limited in their ability to reach out to customers. The Telephone Consumer Protection Act ("TCPA") limits utilities to sending proactive automated text and voice messaging only to customers who have expressly given authorization for such communications, such as those who have enrolled in the *My Oncor Alerts* program or downloaded the *MyOncor* app. Retail electric providers ("REPs") acquire the customer contact information when enrolling their customers and they pass some of that information to the TDUs. In accordance with Oncor's Tariff for Retail Delivery Service, REPs are required to provide the customer's name, address and telephone number to the TDU. However, REPs generally do not share customer email addresses. If Oncor could also acquire the customers' email addresses from the REPs, then Oncor could proactively enroll customers in *My Oncor Alerts*, since email communications are not subject to the restrictions of the TCPA. For those customers not interested in the *My Oncor Alerts* program, the program allows customers to easily unsubscribe.

When Texas SET 4.0 was implemented in 2012, market participants envisioned a need for the transfer of power outage contact information from the REP to the TDU. A new Power Outage Contact Information segment was added to the ERCOT 814_PC EDI transaction which, in part, provides the capability for REPs to electronically transfer customer email addresses to TDUs. To date, most REPs have declined to do so because they are not required to do so. As the Commission contemplates the best way to reach customers during power outage emergencies, consideration should be given to requiring REPs to provide customer email addresses to TDUs, just as they are required to provide customers' names, addresses and telephone numbers. By doing so, the Commission will enable utilities with programs like *My Oncor Alerts* to reach more customers during power outage emergencies, thus complementing the state's own Power Outage Alert system.

IV. CONCLUSION

Oncor appreciates the opportunity to provide this Response to Commission Staff's Questions for Comment.

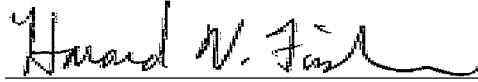
Respectfully submitted,
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Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Howard V. Fisher", written over a horizontal line.

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