Filing Receipt

Received - 2021-08-13 01:12:05 PM
Control Number - 52287
ItemNumber - 9

PROJECT NO. 52287

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

STEERING COMMITTEE OF CITIES SERVED BY ONCOR'S COMMENTS REGARDING POWER OUTAGE ALERT CRITERIA

The Steering Committee of Cities Served by Oncor (OCSC) submits these Comments to the Public Utility Commission of Texas (Commission) regarding Project No. 52287, *Power Outage Alert Criteria.* On July 30, 2021, the Commission requested comments related to the direction in Senate Bill (SB) 3, enacted by the 87th Texas Legislature, for the Commission to participate in a multiagency effort to develop a power outage alert system to be activated when the power supply in the state may be inadequate to meet demand. SB 3 directed the Commission to adopt criteria for the content, activation, and termination of the alert system. Specifically, the Commission requested comments on the following questions:

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 [Commission] 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 [C]ommission also interpret this to mean that an alert will be activated when there are regional constraints that only restrict power supply to certain regions?
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?
3. Government Code § 411.301(b) states, "The [Commission] by rule shall adopt criteria for the content, activation, and termination of the alert." At what threshold should the [C]ommission choose for the alert to be activated? Terminated? What content would be the most helpful for inclusion in the alert?

The Commission also requested other insights and contributions on how to design the power outage alert system. The Commission requested comments from interested parties be filed by August 13, 2021. Therefore, these Comments are timely filed.

I. COMMENTS

OCSC's interest in the development of the power outage alert system and criteria arises from its dual role as both electric consumers in their own right, procuring power in the deregulated retail market for crucial public functions such as fire, police, and water service, and as advocates on behalf of the retail customers who reside or do business within their corporate limits. Winter Storm Uri represented one of the most significant challenges to the ERCOT market since the market opened, and put tremendous strain on the ability of municipalities and other political subdivisions to provide for public health, safety, and welfare. Cities provide essential first-responder services and critical public services that were hampered, and even incapacitated, by the power outages resulting from Winter Storm Uri. As a result, OCSC's concerns and experiences during Winter Storm Uri prompt its support for the establishment of a power outage alert system, which, as the Commission noted, could represent a critical component of the state's ability to respond to future power emergencies.[1] OCSC looks forward to participating in the development of the power outage alert system and criteria implementing SB 3.

In its Request for Comments, the Commission first asked whether it should interpret Texas Government Code § 411.301(a) to mean that an alert will be activated when there is inadequate *system-wide* power supply to meet system-wide load demand, or if it should also interpret it to mean that an alert will be activated when there are regional constraints that only restrict power supply to certain regions. System-wide outages should be the priority of the power outage alert system. However, regional outages should not be ignored. The power outage alert system should be designed in a way such that it can communicate on a broad scale in a system-wide event, but can also send targeted messages to specific areas when there are regional constraints. OCSC notes that in the modern ERCOT market, there have been few regional outages, most notably the outages affecting the Rio Grande Valley in 2011. Nevertheless, the challenges to safety and welfare faced by the public in a regional outage are no different than the challenges faced during a system-wide outage. Whether the outage is system-wide or regional, the members of the public experiencing the outage view the experience the same way, and have the same needs from a power outage alert perspective. In both system-wide and regional outages, OCSC's member cities need clear,

[1] Request for Comments on Power Outage Alert Criteria (Jul. 30, 2021).

actionable information that they can relay throughout their communities and that can be used to determine whether emergency services must be deployed and when.

With regard to regional constraints that restrict power supply to certain regions, the Commission requested comments about how the different regions should be defined. There are several alternatives for defining regions for the power outage alert system. Whichever definition is adopted and utilized, the regional alignment followed for power outage alerts should be developed based on the outage risks for each region. Regional electric outages could be attributed to a weather event, transmission outages, or significant congestion. One proposal is to align the power outage alert regions with ERCOT's Congestion Management zones. Another proposal is to align the regions with the Texas Division of Emergency Management's (TDEM) regions in which they station field response personnel—Region 1 (northeast), Region 2 (east), Region 3 (south), Region 4 (west), Region 5 (north/panhandle), and Region 6 (central).[2] TDEM's field response personnel carry out emergency preparedness activities and also coordinate emergency response operations. TDEM's regions are not dissimilar to ERCOT's Congestion Management zones, and it could prove beneficial to align the power outage alert regions along similar geographic lines to streamline TDEM's emergency preparedness and response activities in specific regions with ERCOT's Congestion Management zones. Another more granular proposal is to develop a power outage alert plan based on the ERCOT weather zones,[3] which will more tightly align extreme weather risks.

In its Request for Comments, the Commission also asked about the threshold the Commission should choose for the power outage alert to be both activated and terminated, and about what content would be most helpful for inclusion in the alert. In answering these questions, it is critical to consider whether the activation and termination criteria are defined strictly, or whether the power outage alert system will allow for some flexibility in real time based upon the situation at hand. ERCOT's existing Energy Emergency Alert (EEA) Communications Matrix is closely tied to the level of operating reserves, which as Winter Storm Uri proved, was insufficient in informing the public. Therefore, it is clear that other factors (for example, anticipated weather, load forecasts, activity in the gas market, etc.) must be incorporated in the activation criteria. The

[2] TDEM's field response regions can be viewed on its website at: https://tdem.texas.gov/field-response/.

[3] ERCOT's weather zones can be viewed on its website at: http://www.ercot.com/about/weather.

power outage alert system may also be more valuable to the public if it is a tiered system that can be updated as circumstances change in real time. The intended audience of the alerts, including OCSC's member cities, must know in advance the criteria for activation and termination of the power outage alert system to align their community messaging with the power outage alert system.

Regarding content that would be most helpful for inclusion in the alert, it is first necessary to identify who the intended audience of the power outage alert is. The Commission should consider if the intended audience is the state agencies, industry members, and media (as has been ERCOT's intended audience in the past), who will then in turn manage messaging to the public, or if the intended audience of the power outage alert is residential customers and the broader public. The intended audience should be clearly established in the rule and will inform what content is appropriate to be included in carefully crafted messaging targeted to the intended audience. As mentioned above, ERCOT's existing EEA Communications Matrix has historically been targeted at market participants and to some participating media, and was not designed to reach and inform the public directly. But again, as Winter Storm Uri proved, existing methods and criteria for disseminating information were insufficient in informing and preparing the public in anticipation of the shortage.

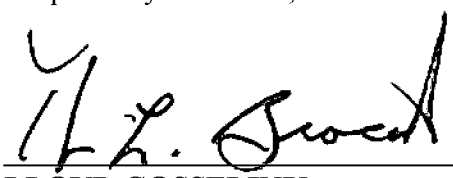
For the power outage alert system to be an effective tool, the responsible state agencies should: 1) have clear objectives for their intended audiences; 2) identify the communications channels it will utilize to communicate the messages; 3) establish the circumstances that will trigger the power outage alert system messages; and 4) develop carefully crafted messages that will provide public benefit. Regardless of what content is ultimately included in the power outage alert messages, it is critical to recognize that there is no one-size-fits-all messaging or operation of the power outage alert system. Risks of outage can arise from a variety of circumstances. Alerts and messaging related to a potential summer afternoon shortage and a multiday winter outage must be specific to the potential risks, and the messages should explain the potential risks in plain language. Messages should also include actionable steps appropriate to the risk of outage, and should be developed for and be specific to all outage scenarios. Lastly, consideration should be given to the alternate risks of any power outage alert messaging—panicking the public unnecessarily if the messaging is not carefully crafted, or alternately, desensitizing the public to emergency messages if the system is activated unnecessarily or messages poorly crafted.

OCSC's member cities are electric customers that will benefit from the power outage alert system messages, but they also act as advocates on behalf of retail customers who reside or do business within their corporate limits, and as such, are responsible for disseminating information and messaging to the citizens in their communities. Therefore, power outage alert messaging must provide information in a manner that allows OCSC's member cities to take actionable steps as electric customers, while also providing information that can then be relayed to their public. OCSC's member cities will also rely on information from the power outage alert system to determine when and whether to deploy emergency services in their communities. The power outage alert system could and should act as a vital tool in both emergency preparedness and response.

OCSC looks forward to the development of a new power outage alert system and in assisting in the rulemaking process in any way it can. OCSC appreciates the opportunity to submit these Comments to the Commission.

Dated: August 13, 2021

Respectfully submitted,



LLOYD GOSSELINK
ROCHELLE & TOWNSEND, P.C.
816 Congress Avenue, Suite 1900
Austin, Texas 78701
(512) 322-5800

THOMAS L. BROCATO
tbrocato@lglawfirm.com
State Bar No. 03039030

TAYLOR P. DENISON
tdenison@lglawfirm.com
State Bar No. 24116344

ATTORNEYS FOR STEERING COMMITTEE OF CITIES SERVED BY ONCOR

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 13, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

THOMAS L. BROCATO