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**ERCOT COMPLIANCE REPORTS OF § PUBLIC UTILITY COMMISSION  
TRANSMISSION SYSTEM WINTER § OF TEXAS  
READINESS PURSUANT TO 16 TAC §  
§ 25.55(f)(3) §**

**ERCOT’S REPORT CONCERNING TRANSMISSION SERVICE PROVIDER  
COMPLIANCE WITH WINTER WEATHER READINESS REPORT  
SUBMISSION REQUIREMENTS**

In accordance with subsection (f)(3) of Public Utility Commission of Texas (Commission) Rule 25.55 (16 Texas Administrative Code (TAC) § 25.55), ERCOT submits this report regarding transmission service provider (TSP) compliance with the requirements for winter weather readiness reporting detailed in Rule 25.55. As further required by subsection (f)(3), this report also addresses whether each TSP submitted an assertion of good cause for failing to comply with any one or more of the winter weather emergency preparation measures prescribed in the rule.

**I. Compliance with Winter Weather Readiness Report Submission Requirement**

Subsection (f)(2) of 16 TAC § 25.55 requires each TSP to submit a winter weather readiness report to ERCOT and the Commission by December 1, 2021. As provided in the rule, the report must include a description of the activities undertaken by the TSP to comply with the winter weather preparation measures required by 16 TAC § 25.55(f)(1) and a notarized attestation confirming the completion of the activities required by the rule. 16 TAC § 25.55(f)(2). On November 16, 2021, ERCOT distributed winter weather readiness report forms via email to all ERCOT-registered TSPs.<sup>1</sup> Each form was required to be completed and submitted electronically to ERCOT via DocuSign.

In Attachment 1 to this filing, ERCOT has identified each TSP’s compliance with the readiness report submission requirement. Attachment 1 also identifies whether the submission was late—i.e., whether ERCOT received it at any time after the December 1, 2021 deadline—and whether the TSP asserted good cause for non-compliance with any requirement in subsection (f)(1) of the rule. As shown in Attachment 1, 100% of TSPs submitted a readiness report. Out of 54 total TSP readiness reports that were required to be submitted, 53—or 98%—were submitted by

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<sup>1</sup> See ERCOT Market Notice W-A111621-01, available at: [https://www.ercot.com/services/comm/mkt\\_notices/detail?id=6f55262f-004c-4382-bff5-4ca34bb3cea8](https://www.ercot.com/services/comm/mkt_notices/detail?id=6f55262f-004c-4382-bff5-4ca34bb3cea8).

the December 1, 2021 deadline. One readiness report was submitted after the December 1 deadline.

## **II. Assertions of Good Cause for Non-Compliance**

As further shown in Attachment 1, out of 54 readiness reports received, four reports asserted good cause for non-compliance with some part of the rule.<sup>2</sup> ERCOT and Commission Staff are presently reviewing these assertions of good cause. These discussions will inform Commission Staff's determination whether to reject any assertion of good cause, as described in subsection (f)(4)(B) of the rule. If Commission Staff notifies the TSP that it disagrees with the assertion, the TSP must initiate a proceeding at the Commission formally requesting a good-cause exception if it wishes to preserve the assertion of good cause for non-compliance. 16 TAC § 25.55(f)(4)(C). For any assertion of good cause that Commission Staff does not disagree with, the TSP would be subject to its proposed plan to come into compliance with the rule, except in cases where a permanent exemption is sought, consistent with subsection (f)(4)(A)(iii) of the rule.

ERCOT would be pleased to provide the Commission with any additional information it may need in evaluating the information in this report.

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<sup>2</sup> ERCOT notes that an additional five readiness reports asserted a good-cause exception for non-compliance with one or more requirements but also asserted that the TSP had complied with the relevant requirement in all respects. Because a good-cause exception is available only to the extent the TSP has not complied with the requirement, 16 TAC § 25.55(f)(4), ERCOT does not regard these assertions to be seeking an exemption due to non-compliance. These five assertions are therefore not reflected in the column "Asserted Good Cause for Non-Compliance" in Attachment 1.

Respectfully submitted,

/s/ Chad V. Seely

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ATTORNEYS FOR ELECTRIC  
RELIABILITY COUNCIL OF TEXAS,  
INC.

## Attachment 1 - Compliance Status of Transmission Service Providers

TSP	Readiness Report Submitted	Report Submitted Late	Report Not Submitted	Asserted Good Cause for Non-Compliance
AEP TEXAS CENTRAL COMPANY (TDSP)	X			
AEP TEXAS INC (TDSP)	X			
AEP TEXAS NORTH COMPANY (TDSP)	X			
BANDERA ELECTRIC CO OP INC (TDSP)	X			X
BIG COUNTRY ELECTRIC CO OP INC (TDSP)	X			
BLUEBONNET ELECTRIC CO OP INC (TDSP)	X			
BRAZOS ELECTRIC POWER CO OP INC (TDSP)	X			
BROWNSVILLE PUBLIC UTILITIES BOARD (TDSP)	X			
BRYAN TEXAS UTILITIES (TDSP)	X			
CENTERPOINT ENERGY HOUSTON ELECTRIC LLC (TDSP)	X			
CHEROKEE COUNTY ELEC CO OP ASSOC (TDSP)	X			
CITY OF AUSTIN DBA AUSTIN ENERGY (TDSP)	X			
CITY OF COLLEGE STATION (TDSP)	X			
CITY OF FARMERSVILLE (TDSP)	X			
CITY OF FLORESVILLE DBA FLORESVILLE ELEC LIGHT AND PWR (TDSP)	X	X		
CITY OF GARLAND (TDSP)	X			
CITY OF LUBBOCK ACTING THROUGH LUBBOCK POWER AND LIGHT (TDSP)	X			
COLEMAN COUNTY ELECTRIC CO OP INC (TDSP)	X			
CONCHO VALLEY ELECTRIC CO OP INC (TDSP)	X			
CPS ENERGY (TDSP)	X			
CROSS TEXAS TRANSMISSION LLC (TSP)	X			
DEEP EAST TEXAS ELECTRIC CO OP INC (TDSP)	X			
DENTON MUNICIPAL ELECTRIC (TDSP)	X			
EAST TEXAS ELECTRIC CO OP (TDSP)	X			
ELECTRIC TRANSMISSION TEXAS LLC (TDSP)	X			
FAYETTE ELECTRIC CO OP INC (TDSP)	X			
GEUS (TDSP)	X			
GOLDEN SPREAD ELECTRIC COOPERATIVE INC (TSP)	X			
GRAYSON COLLIN ELECTRIC COOPERATIVE INC (TDSP)	X			
GUADALUPE VALLEY ELECTRIC CO OP INC (TDSP)	X			
HOUSTON COUNTY ELEC COOP INC (TDSP)	X			
JASPER NEWTON ELECTRIC CO OP INC (TDSP)	X			
KERRVILLE PUBLIC UTILITY BOARD (TDSP)	X			
LAMAR COUNTY ELEC COOP DBA LEC (TDSP)	X			
LCRA TRANSMISSION SERVICES CORPORATION (TDSP)	X			
LIGHTHOUSE ELECTRIC CO OP (TDSP)	X			X
LONE STAR TRANSMISSION LLC (TSP)	X			

### Attachment 1 - Compliance Status of Transmission Service Providers

TSP	Readiness Report Submitted	Report Submitted Late	Report Not Submitted	Asserted Good Cause for Non-Compliance
LYNTEGAR ELECTRIC CO OP INC (TDSP)	X			
NEW BRAUNFELS UTILITIES (TDSP)	X			X
ONCOR ELECTRIC DELIVERY COMPANY LLC (TDSP)	X			
PEDERNALES ELECTRIC CO OP INC (TDSP)	X			
RAYBURN COUNTRY CO OP DBA RAYBURN ELECTRIC (TDSP)	X			
RIO GRANDE ELECTRIC COOPERATIVE INC (TDSP) 1C	X			
SAM HOUSTON ELECTRIC CO OP INC (TDSP)	X			
SAN BERNARD ELECTRIC CO OP (TDSP)	X			
SAN MIGUEL ELECTRIC CO OP INC (TDSP)	X			
SHARYLAND UTILITIES LLC (TDSP)	X			
SOUTH TEXAS ELECTRIC CO OP INC (TDSP)	X			
SOUTHWEST TEXAS ELECTRIC CO OP INC (TDSP)	X			
TEXAS MUNICIPAL POWER AGENCY (TDSP)	X			
TEXAS-NEW MEXICO POWER CO (TDSP)	X			
WESTERN FARMERS ELECTRIC COOPERATIVE (TDSP)	X			X
WIND ENERGY TRANSMISSION TEXAS LLC (TSP)	X			
WOOD COUNTY ELECTRIC COOPERATIVE INC (TDSP)	X			