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**SOAH DOCKET NO. 473-22-1661
PUC DOCKET NO. 52929**

**NOTICE OF VIOLATION BY OCI
ALAMO 1, LLC FOR VIOLATIONS OF
16 TAC § 25.55 CONCERNING WINTER
WEATHER READINESS REPORTING
REQUIREMENTS**

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**BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS**



**DIRECT TESTIMONY OF RAMYA RAMASWAMY
MARKET ANALYSIS DIVISION
PUBLIC UTILITY COMMISSION OF TEXAS
MAY 6, 2022**

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1 **I. STATEMENT OF QUALIFICATIONS**

2 **Q. Please state your name, occupation, and business address.**

3 A. My name is Ramya Ramaswamy. I am employed by the Public Utility Commission of
4 Texas (Commission) as a Senior Engineering Specialist within the Market Analysis
5 Division. My business address is 1701 North Congress Avenue, Austin, Texas 78701.

6 **Q. Please briefly outline your educational and professional background.**

7 A. I have a Master of Science degree in Mechanical Engineering. I completed my degree
8 in May 2003, and I have been employed at the Commission since May 2019. A more
9 detailed summary of my experience is provided in Attachment RR-1.

10 **Q. Are you a registered professional engineer?**

11 A. No.

12 **Q. Have you previously testified as an expert before the Commission?**

13 A. Yes. A list of my previous testimony is provided in Attachment RR-2.

14 **Q. Was this testimony prepared by you or under your supervision?**

15 A. Yes.

16

17 **II. PURPOSE OF TESTIMONY**

18 **Q. What is the purpose of your testimony in this proceeding?**

19 A. The purpose of my testimony is to provide my expert opinion on and recommendations
20 as to OCI Alamo 1 LLC's (Alamo 1) violations of 16 Texas Administrative Code
21 (TAC) § 25.55(c)(2) by failing to comply with the winter weather readiness reporting
22 requirements, as alleged in Commission Staff's Notice of Violation (NOV).¹ Alamo
23 1's violations include its initial failure to submit the required information on the
24 specified due date, and the continuing violations which persisted until the all the

¹ Notice of Violation at 1 (Dec. 8, 2021).

1 required information was submitted, as laid out in the NOV sent to Alamo on December
2 8, 2021.²

3 **Q. What information did you rely upon to reach your conclusions?**

4 A. I relied upon the NOV, information in this docket, information collected as part of
5 Staff's investigation of the violations, information in related Commission projects and
6 rulemakings, relevant Public Utility Regulatory Act (PURA) provisions, and 16 TAC
7 § 25.55. I also relied upon my experience as a subject matter expert on the rulemaking
8 committee responsible for the adoption of 16 TAC § 25.55 and my experience
9 reviewing winter weather readiness reports submitted by generation entities throughout
10 the state.

11 **Q. What issues identified by the Commission in the Preliminary Order of this docket**
12 **do you address in your testimony?**

13 A. I address questions 1 through 6 in the Preliminary Order filed on February 23, 2022.³

14 **Q. Does your testimony include attachments?**

15 A. Yes, Attachments RR-1, RR-2, and RR-3.

16

17 **III. SUMMARY OF RECOMMENDATIONS**

18 **Q. Please provide a summary of your opinions and recommendations as to the issues**
19 **in this matter.**

20 A. It is my opinion and recommendation that:

- 21 • Alamo 1 failed to timely submit winter weather readiness reports for one generation
22 resource and one energy storage resource under its control in violation of TAC
23 § 25.55(c)(2).
24 • Alamo 1 continued to be in violation of TAC § 25.55(c)(2) until December 9, 2021,
25 when Alamo 1 late-submitted the last missing winter weather readiness reports.

² *Id.*

³ Preliminary Order at 12 (Feb. 23, 2022).

IV. GOVERNING DEFINITIONS, RULES & LAWS

Q. Please describe the applicable laws relevant to this proceeding.

A. While I am not an attorney, my experience on the rulemaking committee that developed 16 TAC § 25.55 informs my belief that the following definitions, rules and laws are relevant to this proceeding:

- 16 TAC § 25.55(b)(3), which defines an energy storage resource as “[a]n energy storage system registered with Electric Reliability Council of Texas (ERCOT) for the purpose of providing energy or ancillary services to the ERCOT grid and associated facilities controlled by the generation entity that are behind the system’s point of interconnection, necessary for the operation of the system, and not part of a manufacturing process that is separate from the generation of electricity.”
- 16 TAC § 25.55(b)(3), which defines a generation entity as “[a]n ERCOT-registered resource entity acting on behalf of an ERCOT-registered generation resource or energy storage resource.”
- 16 TAC § 25.55(b)(4), which defines a generation resource as “[a] generator capable of providing energy or ancillary services to the ERCOT grid, and is registered with ERCOT as a generation resource.”
- 16 TAC § 25.55(c)(1), which set forth a list of winter weather emergency preparation measures that each generation entity in the ERCOT power region was required to complete at each resource under its control no later than December 1, 2021.
- 16 TAC § 25.55(c)(2), which required each generation entity in the ERCOT power region to submit a winter weather readiness report for each ERCOT-registered generation and energy storage resource under its control no later than December 1, 2021. Each winter weather readiness report was required to describe all preparation methods conducted to complete the winter emergency

1 preparedness measures, and include a notarized attestation attesting to the
2 completion of all required preparations.

- 3 • 16 TAC § 25.55(c)(6)(A), which allowed a generation entity to submit, as part
4 of a winter weather readiness report, a notice asserting good cause for
5 noncompliance with specific requirements for winter weather emergency
6 preparation measures set forth under 16 TAC § 25.55(c)(1). The generation
7 entity's notice was required to include an explanation and supporting
8 documentation of the generation entity's inability to timely comply with the
9 preparation standard(s), a description and supporting documentation detailing
10 the efforts taken to achieve compliance with the outstanding preparation
11 standard(s), and a plan and expected timeline for compliance with the
12 outstanding requirements, with supporting documentation.
- 13 • PURA § 35.0021(b), which requires the Commission to require, by rule, electric
14 generators to prepare their generation assets to provide adequate electric
15 generation service during a weather emergency.

16
17 **V. BACKGROUND: REPORTING REQUIREMENT**

18 **Q. You mentioned that you were on the rulemaking committee responsible for the**
19 **development and implementation of the Commission's winter weather readiness**
20 **requirements under 16 TAC § 25.55, as required under PURA § 35.0021. Could**
21 **you please explain how your experience on that rulemaking committee makes you**
22 **qualified to testify in this matter?**

23 **A.** Being part of the rulemaking committee allowed me to meet and visit generation
24 entities, understand seasonal preparation methods adopted by generation entities to
25 prepare in advance of winter and summer seasons in Texas, especially considering the
26 varied geographies within the state, and breakdown the preparation process in such a
27 way that the generation entity, ERCOT and Commission Staff could work together in

1 readying the electric grid for the upcoming winter season.

2 **Q. Given your familiarity with the rulemaking, can you explain why the Commission**
3 **chose to establish December 1, 2021 as the deadline for winter weather**
4 **preparations and the submission of winter weather readiness reports under 16**
5 **TAC § 25.55(c)?**

6 A. ERCOT Nodal Protocols § 2.1 defines the months of December, January and February
7 as “winter months.”⁴ By establishing December 1, 2021 as the date by which all
8 generation entities were required to complete the winter weather emergency
9 preparations under 16 TAC § 25.55(c)(1) for each of their resources, the Commission
10 wanted to ensure that the generation fleet in the ERCOT region was prepared for the
11 winter weather at the start of the winter season.

12 **Q. Why did the Commission require the submission of winter weather readiness**
13 **reports as part of the weather preparedness program established under 16 TAC**
14 **§ 25.55?**

15 A. The reporting mechanism established under 16 TAC § 25.55(c)(2) was included in the
16 rule as a first step for holding generation entities accountable for compliance with the
17 physical preparation requirements under 16 TAC § 25.55(c)(1). Due to the short
18 timeline between the date 16 TAC § 25.55 was adopted and the start of the winter
19 season, it was not feasible for Commission Staff or ERCOT to physically inspect the
20 approximately 850 generation and energy storage resources in the ERCOT power
21 region for compliance with the rule before the beginning of the winter season.
22 Accordingly, the rule required generation entities to submit winter weather readiness
23 reports by December 1, 2021 to demonstrate each resource’s compliance with the
24 physical preparation requirements.

25 In addition to demonstrating compliance with the physical preparation

⁴ ERCOT Nodal Protocol § 2.1 at 90, definition for “Season or Seasonal”.

1 requirements, the reports also provided Commission Staff and ERCOT with critical
2 information about the state of readiness of ERCOT's resource fleet for the winter
3 weather, and provided entities an opportunity to seek additional time, as necessary, to
4 implement preparation measures.

5 **Q. How did the submission of a winter weather readiness report serve to demonstrate**
6 **that a generation resource or an energy storage resource was prepared for the**
7 **winter season?**

8 A. The winter weather readiness reports served as a means of demonstrating compliance
9 with the winter weather preparation standards to ERCOT and Commission Staff. The
10 reports included detailed explanations of the activities that had been completed at each
11 resource to prepare for the winter weather, and required each generation entity's highest
12 officer to attest to the completion of the activities described in the reports. As affirmed
13 by the attestation, the reports served as a substantive demonstration of compliance with
14 the requirements under 16 TAC § 25.55(c)(1).

15 Additionally, to the extent that a resource was unable to fully comply with the
16 preparation standards by the December 1, 2021 submission deadline, the reports
17 informed ERCOT and Commission Staff of the outstanding activities which remained
18 to be completed, efforts already taken to comply with the outstanding requirements,
19 and expected compliance dates. As a result, the reports allowed ERCOT and
20 Commission Staff to ensure and confirm that each resource was prepared for winter
21 weather, or was taking the steps necessary to become prepared for winter weather in
22 the near future. To the extent that a generation entity did not submit a report, ERCOT
23 and Commission Staff had no way to be informed whether a resource was compliant
24 with 16 TAC § 25.55(c)(1) or was prepared for winter weather until such time that a
25 physical inspection was completed.

26 **Q. Why did the Commission establish a means for generation resources and energy**
27 **storage resources to assert good cause for non-compliance with the requirements**

1 **of TAC § 25.55?**

2 A. 16 TAC § 25.55 was adopted on October 26, 2021,⁵ which gave generation entities
3 approximately five weeks to achieve compliance with the new physical preparation
4 standards before December 1, 2021. Given the short timeline for compliance, the
5 Commission provided a mechanism to give entities that struggled with logistical
6 complications, such as supply chain delays or labor shortages, additional time to
7 achieve compliance by asserting good cause for non-compliance.

8 **Q. How did the Commission use the information provided as part of an assertion of**
9 **good cause for non-compliance within winter weather readiness reports?**

10 A. Under 16 TAC § 25.55(c)(6), a good cause assertion was required to include detailed
11 information explaining the reason for non-compliance, steps taken to achieve
12 compliance, an expected completion date, and supporting information to demonstrate
13 the veracity of the good cause assertion. This information allowed ERCOT and
14 Commission Staff to gauge the readiness of resources during specific timelines and
15 allowed ERCOT and generation entities to coordinate the timing of when preparation
16 measures could be completed.

17 **Q. What was the impact of a generation entity's failure to submit a winter weather**
18 **readiness report on time?**

19 A. Commission Staff and ERCOT relied on the winter weather readiness reports to gauge
20 the preparations of the ERCOT generation fleet when planning for the winter months.
21 The failure to timely submit a winter weather readiness report resulted in uncertainty
22 in the reliability planning process, specifically whether the resource was fully prepared
23 or if any deficiencies could hinder its reliable operation during the winter season.

24

25

⁵ *Rulemaking to Establish Electric Weatherization Standards*, Project No. 51840, Order Adopting New 16 TAC § 25.55, as Approved at the October 21, 2021 Open Meeting (Oct. 26, 2021).

VI. BACKGROUND: GENERATION ENTITY AND RESOURCES

Q. Please briefly describe Alamo 1.

A. Alamo 1 is a solar project developed by OCI Solar Power LLC (OCI Solar Power), which has been a utility-scale solar developer in the greater San Antonio area since 2011.⁶ Alamo 1 was developed by OCI Solar Power for CPS Energy, the municipally-owned electric and gas utility in San Antonio, as a part of a 600 megawatt (MW) solar initiative.⁷ Alamo 1 is a photo-voltaic module solar generation facility of approximately 39.18 MW.⁸ The Alamo 1 project site also includes an approximately 1 MW energy storage system known as “Astro” within the Alamo 1 project boundaries.^{9,10}

Q. Is Alamo 1 registered with the Commission as a power generation company (PGC) in the ERCOT region under PURA § 35.0021?

A. Yes. Alamo 1 is registered with the Commission in 2013 under PGC number 20301.¹¹

Q. On December 1, 2021, was Alamo 1 a generation entity as defined under 16 TAC § 25.55(b)(3)?

A. Yes, on December 1, 2021, Alamo 1 was an ERCOT-registered generation entity, acting on behalf of one or more ERCOT-registered generation resources or energy storage resources.¹²

Q. On December 1, 2021, were there ERCOT-registered generation resources or energy storage resources, as defined by 16 TAC § 25.55(b)(4) and 16 TAC § 25.55(b)(2), under Alamo 1’s control, in its capacity as a generation entity?

⁶ OCI Alamo 1 LLC’s Request for a Hearing and Settlement Conference at 2 (Dec. 22, 2021).

⁷ *Id.* at 2.

⁸ Attachment RR-3 at 2.

⁹ *Id.*

¹⁰ OCI Alamo 1 LLC’s Request for a Hearing and Settlement Conference at 2 (Dec. 22, 2021).

¹¹ *Application of OCI Solar San Antonio LLC for Power Generation Companies Registration, Pursuant to P.U.C. Subst. R. 25.109*, Docket No. 41329, Notice of Approval (Apr. 4, 2013).

¹² Attachment RR-3 at 2.

A. Yes. On December 1, 2021, Alamo 1 had two ERCOT-registered resources under its control: a generation resource, OCI_ALM1-UNIT1, and an energy storage resource, OCI_ALM1-ASTRO1.¹³

VII. WINTER WEATHER READINESS REPORTING REQUIREMENTS

Q. Was Alamo 1 required under 16 TAC § 25.55(c)(1) to complete winter weather emergency preparation measures for each resource under its control by December 1, 2021?

A. Yes. Because Alamo 1 met the definition of “generation entity” under 16 TAC § 25.55(b)(3), it was required to timely complete all requirements under 16 TAC § 25.55(c)(1) for each resource under its control.

Q. Was Alamo 1 required under 16 TAC § 25.55(c)(2) to submit winter weather readiness reports to ERCOT by December 1, 2021?

A. Yes. Because Alamo 1 met the definition of “generation entity” under 16 TAC § 25.55(b)(3), Alamo 1 was required under 16 TAC § 25.55(c)(2) to submit a winter weather readiness report for each resource under its control to ERCOT by December 1, 2021 on a form prescribed by ERCOT, describing all winter weather preparation activities engaged in by Alamo 1 specifically for the resource. Additionally, each winter weather readiness report was also required to include a notarized attestation, sworn to by Alamo 1’s highest-ranking representative, attesting to the veracity of the information contained in the report.

Q. Did Alamo 1 timely submit winter weather readiness reports for each of its resources to ERCOT as required under 16 TAC § 25.55?

A. No. Alamo 1 did not submit the winter weather readiness reports as required for OCI_ALM1-UNIT1 and OCI_ALM1-ASTRO1 by December 1, 2021.¹⁴

¹³ *Id.*

¹⁴ *Id.*

1 **Q. When did Alamo 1 submit its winter weather readiness reports to ERCOT?**

2 A. Alamo 1 submitted to ERCOT the winter weather readiness report for OCI_ALM1-
3 UNIT1 on December 8, 2021, and for OCI_ALM1-ASTRO1 on December 9, 2021.¹⁵

4 **Q. Did the late-submitted winter weather readiness reports for Alamo 1's resources**
5 **address the winter preparation requirements outlined in 16 TAC § 25.55(c)(1)?**

6 A. Yes. The winter weather readiness reports for both resources under Alamo 1's control
7 satisfied all the preparation standards outlined in 16 TAC § 25.55(c)(1). The winter
8 weather readiness reports for both resources also included notarized attestations from
9 Alamo 1's highest-ranking official with binding authority, satisfying all requirements
10 outlined by 16 TAC § 25.55(c)(2).

11 **Q. Did the late-submitted winter weather readiness reports include any applicable**
12 **assertions of good cause for non-compliance with the physical preparation**
13 **requirements under 16 TAC § 25.55(c)(1), as required by 16 TAC**
14 **§ 25.55(c)(2)(A)?**

15 A. Yes. In the winter weather readiness reports for both OCI_ALM1-UNIT1 and
16 OCI_ALM1-ASRTO1, Alamo 1 asserted good cause for noncompliance with the
17 requirements under 16 TAC § 25.55(c)(1)(A), stating that the corresponding
18 preparation standards did not apply to its specific generation and energy storage
19 resources due to the nature of the facilities. On December 17, 2021, Commission Staff
20 filed a notice of disagreement with Alamo 1's good cause assertions in Project No.
21 52786.¹⁶ On December 29, 2021, Alamo 1 filed a response to Commission Staff's
22 notice with detailed list of all the measures taken by Alamo 1 in preparation for the

¹⁵ *Id.*

¹⁶ *ERCOT Compliance Reports of Generation Resource Winter Readiness Pursuant to 16 TAC § 25.55(c)(4)*, Docket No. 52786, Notice of Disagreement with OCI Alamo 1 LLC's Assertion of Good Cause (Dec. 17, 2021).

1 upcoming winter.¹⁷ Commission Staff reviewed the additional information submitted
2 by Alamo 1, and on January 20, 2022, Commission Staff withdrew its notice of
3 disagreement.¹⁸
4

5 **IIIX. REGULATORY IMPACT OF VIOLATIONS**

6 **Q. In your opinion, did Alamo 1 initially violate 16 TAC § 25.55(c)(2) on December**
7 **1, 2021 by failing to timely submit the winter weather readiness reports for**
8 **OCI_ALM1-UNIT1 and OCI_ALM1-ASTRO1?**

9 A. Yes. 16 TAC § 25.55(c)(2) requires generation entities to submit the winter weather
10 readiness reports to ERCOT, on a form prescribed by ERCOT, that describes all winter
11 weather preparation activities engaged by the generation entity to prepare for the
12 upcoming winter season by December 1, 2021. Alamo 1 violated 16 TAC § 25.55(c)(2)
13 by failing to submit the winter weather readiness reports and the required notarized
14 attestations for OCI_ALM1-UNIT1 and OCI_ALM1-ASTRO1 by December 1, 2021.

15 **Q. In your opinion, did Alamo 1 continue to violate 16 TAC § 25.55(c)(2) on each day**
16 **after December 1, 2021 that Alamo failed to submit the required winter weather**
17 **readiness reports?**

18 A. Yes. Alamo 1 submitted the winter weather readiness report for OCI_ALM1-UNIT1
19 to ERCOT on December 8, 2021, and for OCI_ALM1-ASTRO1 on December 9,
20 2021.¹⁹ By filing the reports after the December 1, 2021 deadline, Alamo 1 continued
21 to violate the rule until all the required documentation was submitted to ERCOT.

22 **Q. What was the impact of Alamo 1's failure to submit the winter weather readiness**
23 **reports by December 1, 2021?**

¹⁷ *Id.* at OCI Alamo 1 LLC's Response to Commission Staff's Notice of Disagreement with Assertion of Good Cause (Dec. 29, 2021).

¹⁸ *Id.* at Notice of Withdrawal of Disagreement with OCI Alamo 1 LLC'S Assertion of Good Cause (Jan. 20, 2022).

¹⁹ Attachment RR-3 at 2.

1 A. Because Alamo 1 did not submit the required winter weather readiness reports on
2 December 1, 2021, Commission Staff and ERCOT were unable to discern whether the
3 Alamo 1 resources were prepared for winter weather conditions at the start of the winter
4 season or, to the extent they were not prepared by December 1, 2021, by what date the
5 resources would be prepared for winter. Moreover, Commission Staff and ERCOT
6 were unaware which preparation activities may have been outstanding, the anticipated
7 need for future scheduled maintenance dates, or how those circumstances could affect
8 reliability planning for this generation entity in the event of extreme winter weather
9 during the winter 2021 season. The uncertainty caused by the lack of information
10 created a potential hazard to the reliability of the electric grid, and, therefore, to the
11 health, safety, and economic welfare of the public.

12 Additionally, 16 TAC § 25.55(c)(3), (4), and (6)(B) assigned expeditious
13 deadlines to ERCOT and Commission Staff to review the winter weather readiness
14 reports for approximately 850 generation entities in the ERCOT region. Because
15 Alamo 1's winter weather readiness reports were not submitted by December 1, 2021,
16 ERCOT and Commission Staff were unable to timely consider Alamo 1's
17 circumstances at the outset of the report evaluation period.

18 **Q. Is the impact of a failure to submit the required winter weather readiness reports**
19 **by the submission deadline different than the ongoing impact of a continuing**
20 **violation?**

21 A. Yes. While both the initial and continuing violations caused a potential hazard to the
22 health, safety, and economic welfare of the public by creating uncertainty regarding the
23 reliability of Alamo 1's resources in winter weather emergencies, the continuing failure
24 to submit all required information pertaining to the preparation measures undertaken
25 by Alamo 1 until December 9, 2021, created additional strain to accommodate the late
26 submission in the process of adhering to the tight deadlines established under 16 TAC
27 § 25.55(c)(3), (4), and (6)(B).

1 **Q. In your opinion, what was the impact of the continued failure to submit the**
2 **required winter weather readiness reports by the submission deadline, which**
3 **resulted in the finding of a continuing violation?**

4 A. In my opinion, Alamo 1's late submission of its winter weather readiness reports
5 delayed Commission Staff and ERCOT's ability to consider how the specific nature of
6 Alamo 1's compliance status would impact the reliability of its resources – and the
7 resource's impact on the reliability of the grid, in general – in the event of extreme
8 winter weather during the winter 2021 season. By delaying the ability to access to
9 information required to accurately assess and plan for grid reliability, Alamo 1's
10 continued violations created a potential hazard to the health, safety, and economic
11 welfare of the public.

12 In addition, each day that passed without receiving Alamo 1's required winter weather
13 readiness reports increased the potential hazard to the health, safety, and welfare of the
14 public because, winter season had started on December 1, 2021, the likelihood of severe
15 weather increased every day and, therefore, the reliability risk caused by uncertainty
16 regarding Alamo 1's compliance status grew. Each day that a winter weather readiness
17 report was late represented an additional delay to effectively and accurately assess the
18 reliability of the ERCOT generation fleet in advance of a future winter weather event.

19
20 **IX. CONCLUSION**

21 **Q. Please summarize your opinions and recommendations.**

22 A. It is my opinion that Alamo 1 initially violated 16 TAC § 25.55(c)(2) twice on
23 December 1, 2021 by failing to timely submit the winter weather readiness reports for
24 its generation and energy storage resources. It is also my opinion that Alamo 1
25 continued to violate 16 TAC § 25.55(c)(2) for each resource on each day after
26 December 1, 2021 that Alamo 1 failed to submit the required winter weather readiness
27 reports. I recommend that a finding of fact be made to this effect.

1 **Q. Does the testimony given herein constitute your opinion based on your knowledge**
2 **and facts of the circumstances in this matter?**

3 A. Yes.

4 **Q. Does this conclude your direct testimony?**

5 A. Yes. I reserve the right to supplement this testimony during the course of the proceeding
6 if new evidence becomes available.

ATTACHMENT RR-1
QUALIFICATIONS OF RAMYA RAMASWAMY

Qualifications of Ramya Ramaswamy

In May 2000, I received a Bachelor of Science degree in Mechanical Engineering from Bharathiyar University in Coimbatore, Tamil Nadu, India. In December 2004, I earned my Master of Science degree in Mechanical Engineering from Texas A&M University in College Station, Texas. My Master's thesis focused on loss of bone density and mechanical strength of bones due to osteoporosis, weightlessness in space, and during prolonged bedrest.

Upon completion of my Master's, I worked for Thermo Fisher Scientific for more than twelve years in the Research and Development (R&D) division. My primary duties included designing analyzers for coal, cement, nuclear, and oil industries. I was responsible for identifying and analyzing design issues, designing the analyzer, planning, and sourcing materials and vendors that would best suit my design. I was also tasked with identifying new national and international vendors to manufacture various parts of the analyzers, assembling and testing the analyzer in-house and in the field to meet customer and company standards, and releasing it to manufacturing and the market. Additionally, I provided engineering support to the field team, the marketing, and the manufacturing team with regards to any technical issues related to the design and assisted with the installation and mechanical aspects of the analyzers.

Prior to accepting my current role at the Public Utility Commission of Texas, I worked as a Manufacturing Engineer at Applied Materials and as a Senior Consultant at a supply chain consulting firm. I joined the Public Utility Commission of Texas in May 2019 as an Engineering Specialist in the Infrastructure Division.

ATTACHMENT RR-2
LIST OF PREVIOUS TESTIMONY

List of Previous Testimony

Docket No. 49603 – *Application of Upshur Rural Electric Cooperative Corporation to Amend its Certificate of Convenience and Necessity for a 138-kV Transmission Line in Harrison County (Hallsville – Gum Spring)*

Docket No. 50714 – *Application of Entergy Texas, Inc. to Amend its Distribution Cost Recovery Factor*

Docket No. 50669 – *Application of Southwestern Electric Power Company to Amend its Certificate of Convenience and Necessity for the SWEPCO Morton Cut-In to the Wood County Electric Cooperative E Burges Cut-In 138-kV Transmission Line in Van Zandt County*

Docket No. 50410 – *Joint Application of Wind Energy Transmission Texas, LLC and Oncor Electric Delivery Company LLC to Amend their Certificates of Convenience and Necessity for the Bearkat Switching Station-to-Longhorn Switching Station 345-kV Transmission Line in Glasscock and Howard Counties*

Docket No. 50830 – *Application of Guadalupe Valley Electric Cooperative, Inc. to Amend its Certificate of Convenience and Necessity for a 138-kV Transmission Line in Caldwell and Gonzales Counties (Delhi-to-Bluestem 138-kV Transmission Line)*

Docket No. 51415 – *Application of Southwestern Electric Power Company for Authority to Change Rates*

ATTACHMENT RR-3
AFFIDAVIT OF JOEL KOEPKE

DOCKET NO. 52929

NOTICE OF VIOLATION BY OCI § PUBLIC UTILITY COMMISSION
ALAMO 1, LLC FOR VIOLATIONS OF § OF TEXAS
16 TAC § 25.55 CONCERNING WINTER §
WEATHER READINESS REPORTING §
REQUIREMENTS

AFFIDAVIT OF JOEL KOEPKE

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

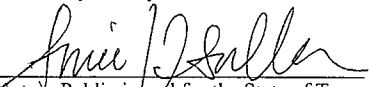
BEFORE ME, the undersigned authority, on this day personally appeared Joel Koepke and, being by me duly sworn, under oath declared that the following statements are true and correct:

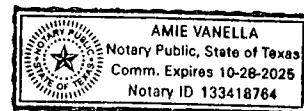
“My name is Joel Koepke. I am an employed as a Senior Manager of Grid Coordination Support and Development by Electric Reliability Council of Texas, Inc. (ERCOT). I am over the age of eighteen and competent to make this Affidavit. I have personal knowledge of the attached RFI responses being provided to the Public Utility Commission of Texas and the facts stated in the RFI Responses are true and correct.”

SIGNED on this the 5th day of May 2022.


AFFIANT: JOEL KOEPKE

SWORN TO AND SUBSCRIBED BEFORE ME this the 5th day of May 2022.


Notary Public in and for the State of Texas



DOCKET NO. 52929

NOTICE OF VIOLATION BY OCI	§	PUBLIC UTILITY COMMISSION
ALAMO 1, LLC FOR VIOLATIONS OF	§	OF TEXAS
16 TAC § 25.55 CONCERNING WINTER	§	
WEATHER READINESS REPORTING	§	
REQUIREMENTS		

**ELECTRIC RELIABILITY COUNCIL OF TEXAS'S RESPONSE TO PUBLIC UTILITY
COMMISSION OF TEXAS STAFF'S REQUEST FOR INFORMATION (RFI)**

RFI 1-1: Please list all resources registered by OCI Alamo 1, LLC with ERCOT.

Response:

OCI-ALM1_ASTRO1 – Generation – power storage
OCI-ALM1_LD1 – Load – Controllable Load Resource
OCI-ALM1_UNIT1 - Generation – Photovoltaic

Response provided by Joel Koepke, Senior Manager, Grid Coordination Support and Development

RFI 1-2: Please provide the total nameplate capacity of each resource listed in response to RFI 1-1.

Response:

OCI-ALM1_ASTRO1 – 1 MW
OCI-ALM1_LD1 – N/A as a load resource
OCI-ALM1_UNIT1 – 39.18 MW

Please note that as a result of a transcribing error, ERCOT previously provided an affidavit dated December 8, 2021, which mistakenly identified the total capacity of OCI-ALM1_ASTRO1 and OCI-ALM1_UNIT1 as approximately 4.19 MW.

Response provided by Joel Koepke, Senior Manager, Grid Coordination Support and Development, and Sujatha Kotamarty, Supervisor of Model Maintenance

RFI 1-3: Please provide the date(s) OCI Alamo 1 submitted a signed, complete winter weather readiness report for each resource listed in RFI 1-1.

Response:

OCI-ALM1_ASTRO1 – 12-08-2021, 5:52:25 PM CST
OCI-ALM1_LD1 – not subject to requirement to complete winter weather readiness report
OCI-ALM1_UNIT1 – 12-09-2021, 12:12:40 PM CST

Response provided by Joel Koepke, Senior Manager, Grid Coordination Support and Development

Respectfully submitted,

Electric Reliability Council of Texas, Inc.

By: /s/ Katherine Gross

Katherine Gross
Senior Corporate Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May 2022, ERCOT transmitted its Responses to the Public Utility Commission of Texas Staff's Request for Information regarding DOCKET NO. 52929, Notice of Violation by OCI Alamo 1, LLC for Violations of 16 TAC §§ 25.55, Concerning Winter Weather Readiness Reporting Requirements.

/s/ Katherine Gross

Katherine Gross