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DOCKET NO. 55642

SETTLEMENT AGREEMENT AND	§	PUBLIC UTILITY COMMISSION
REPORT TO THE COMMISSION	§	
REGARDING FRONTIER UTILITIES,	§	OF TEXAS
LLC’S ALLEGED VIOLATIONS OF	§	
PURA § 39.101(h), RELATED TO	§	
CUSTOMER SAFEGUARDS AND 16	§	
TAC §§ 25.483(b)(2)(B), RELATED TO	§	
DISCONNECTIONS OF SERVICE, AND	§	
25.483(j), RELATED TO	§	
DISCONNECTION OF SERVICE	§	

SETTLEMENT AGREEMENT AND REPORT TO THE COMMISSION

The Staff of the Public Utility Commission of Texas (Commission) and Frontier Utilities, LLC (Frontier) (collectively, the parties) enter into this settlement agreement and file this joint report to the Commission under 16 Texas Administrative Code (TAC) § 22.246(h)(1). The agreement resolves and concludes Commission Staff’s investigation of Frontier concerning alleged violations of Public Utility Regulatory Act (PURA)¹ § 39.101(h), relating to customer safeguards, and 16 TAC §§ 25.483(b)(2)(B), related to disconnection of service, and 25.483(j), related to disconnection of service.

The parties agree as follows:

1. The parties agree to the assertions and stipulate to the facts contained in the agreement and the attached proposed order,² and request approval of an order by the Commission consistent with the details contained herein.
2. The Commission has jurisdiction over this matter under PURA §§ 14.001, 14.051, 14.054 15.023, 15.024, and 39.357.
3. Frontier is an Option 1 retail electric provider (REP) registered with the Commission under REP certificate number 10169.
4. Frontier is a limited liability company registered with the Texas Secretary of State under filing number 801527837.

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016.

² Attachment A.

16 TAC § 25.483(b)(2)(B)

5. On October 8, 2008, the Commission approved Frontier's application for a REP certificate.³
6. Under 16 TAC § 25.483(b)(2)(B), prior to authorizing disconnections for non-payment of residential and small non-residential customers, a REP shall file an affidavit from an officer of the company, in a project established by the Commission for this purpose, affirming that the REP understands and has trained its personnel on the Commission's rule requirements related to disconnection and reconnection, and has adequately tested all necessary electronic transactions related to disconnections and reconnections of service.
7. On May 20, 2004, the Commission opened Project No. 29760, which is the project established by the Commission for the filing of affidavits in accordance with 16 TAC § 25.483(b)(2)(B).⁴
8. Frontier began authorizing disconnections for nonpayment of residential and small non-residential customers as early as 2009.⁵
9. Commission Staff alleges that Frontier did not file the affidavit required under 16 TAC § 25.483(b)(2)(B) in Project No. 29760 until August 3, 2023.⁶
10. Commission Staff alleges that Frontier violated 16 TAC § 25.483(b)(2)(B) by failing to file the required affidavit before authorizing disconnections for nonpayment of residential and small non-residential customers.
11. A REP's violation of 16 TAC § 25.483(b)(2)(B) is a Class B violation under 16 TAC § 25.8(b)(2).

³ *Application of Frontier Utilities, Inc. for Retail Electric Provider (REP) Certification*, Docket No. 36106, Notice of Approval (Oct. 8, 2008).

⁴ *Compliance Filings Relating to Disconnection of Electric Service Pursuant to PUC Subst. R. 25.483(b)(2)(C)*, Project No. 29760 (pending). Prior to a rule change, the current language of 16 TAC § 25.483(b)(2)(B) was contained under 16 TAC § 25.483(b)(2)(C).

⁵ *Id.*, Confidential – Disconnection for Non Payment Reports – May 2009-June 2009 Bate Stamp 1-3 (Jul. 15, 2009).

⁶ *Id.*, Item No. 2951, Affidavit (Aug. 3, 2023).

PURA § 39.101(h) and 16 TAC § 25.483(j)

12. Under PURA § 39.101(h), a REP may not disconnect service to a residential customer during an extreme weather emergency or on a weekend day.
13. Under 16 TAC § 25.483(j), a REP having disconnection authority under the provision of subsection (b) of that section shall not authorize a disconnection for nonpayment of electric service for any customer in a county in which an extreme weather emergency occurs.
14. An “extreme weather emergency” is defined in 16 TAC § 25.483(j)(1) as a day when "the previous day's highest temperature did not exceed 32 degrees Fahrenheit, and the temperature is predicted to remain at or below that level for the next 24 hours anywhere in the county, according to the nearest National Weather Service (NWS) reports; or the NWS issues a heat advisory for a county, or when such advisory has been issued on any one of the preceding two calendar days in a county."
15. Commission Staff asserts that from November 1, 2020 through September 1, 2022, Frontier authorized the disconnection for nonpayment of electric service for 90 customers located in counties affected by extreme weather emergencies to be completed during the pendency of the emergencies.
16. The transmission and distribution utilities that received Frontier’s request to disconnect service for nonpayment did not complete any of the authorized disconnections.
17. Commission Staff alleges that Frontier violated PURA § 39.101(h) and 16 TAC § 25.483(j) when it authorized 90 disconnections for non-payment during extreme weather emergencies to be completed during the pendency of the emergencies for ESI IDs in counties affected by the emergencies.
18. Commission Staff asserts that the alleged violations of PURA § 39.101(h) and 16 TAC § 25.483(j) are Class A violations under 16 TAC § 25.8(b)(3)(B).

Settlement Terms

19. Frontier fully cooperated with Commission Staff’s investigation.
20. Under PURA § 15.023, the Commission is authorized to impose administrative penalties for violations of PURA or rules adopted under PURA.

21. Under 16 TAC § 25.8(b)(2), all violations not specifically enumerated as a Class C or Class A violation are Class B violations. The maximum administrative penalty for Class B violations may not exceed \$5,000 per violation per day.
22. Under 16 TAC § 25.8(b)(3)(B), violations that create a hazard or potential hazard to the health or safety of the public are Class A violations. The maximum penalty for a Class A violation may not exceed \$25,000 per violation per day.
23. Commission Staff recommends, and Frontier agrees to pay, an administrative penalty of \$88,500 in resolution of the alleged violations discussed in this agreement and in the attached proposed order.
24. Frontier asserts it has implemented the following protective measures to prevent future authorizations of disconnections for nonpayment during extreme weather emergencies, and will continue to implement such measures going forward:

- a. **Additional Personnel Receiving NWS Alerts**

Frontier has increased the number of operations personnel who receive NWS emergency weather alerts. Frontier's current multi-step verification process now not only ensures all moratoriums are properly entered into internal systems but also utilizes two operations personnel to mitigate potential human error. When it is determined that an extreme weather emergency is occurring, one operations personnel enters the moratorium(s) and another operations personnel checks what has been entered for accuracy before any disconnection for nonpayment orders are sent. Because Frontier has increased the number of personnel who receive NWS alerts, Frontier will also conduct cross training on the verification process to further prevent errors due to staff absence or turnover.

- b. **In-Depth Disconnect/Reconnect Request Evaluation**

Frontier's increase in the number of operations personnel receiving NWS alerts has put Frontier in a better position to more proactively evaluate decisions surrounding disconnection requests and take actions to ensure all processes comply with Commission rules. Frontier continuously discusses processes and makes decisions

related to extreme weather moratoriums in order to ensure compliance with Commission rules.

25. Frontier asserts that it will implement the following protective measures to further prevent future authorizations of disconnections for nonpayment during extreme weather emergencies:

a. **Seasonal Preparedness Meetings**

Frontier has implemented a plan to begin conducting seasonal preparedness meetings to review system processes, conduct additional as-needed trainings, and ensure all teams are prepared for potential future weather events while adhering Commission rules.

26. Should Frontier authorize any disconnections for nonpayment during an extreme weather emergency to be completed during the pendency of the emergency going forward, Frontier will take actions necessary to ensure that the disconnections are not completed, including submission of precautionary reconnect orders.
27. Frontier agrees to maintain compliance with Commission rules governing authorization of disconnections for nonpayment during extreme weather emergencies going forward.
28. In support of the agreed administrative penalty, Commission Staff provides the following analysis of factors to be considered when determining a reasonable and appropriate administrative penalty, as required under PURA § 15.023(c) and 16 TAC § 22.246(c)(3):

- a. ***The seriousness of the violation, including the nature, circumstances, extent, and gravity of any prohibited acts, and the hazard or potential hazard created to the health, safety, or economic welfare of the public.*** Commission Staff asserts that the alleged violations described in this settlement agreement are serious in nature. A violation of 16 TAC § 25.483(b)(2)(B), by failing to file the required affidavit, effectively bypasses the Commission's mechanism for ensuring that REPs comply with the requirements for testing and training related to disconnection and reconnection of service under 16 TAC § 24.483(b)(2)(A). Because the Commission does not have unlimited resources, it must rely on affidavits, such as the one

required under 16 TAC § 25.483(b)(2)(B), to ensure compliance with the many regulations under the Commission's purview.

The alleged violations of PURA § 39.101(h) and 16 TAC § 25.483(j) could have caused a potential hazard to the health and safety of the public. In the summer, extreme weather emergencies are declared when the heat index exceeds between 105 to 110 degrees Fahrenheit. In the winter, extreme weather emergencies are declared when temperatures are at or below freezing for an extended period of time. Many cooling and heating systems in Texas are powered by electricity, and losing electric service during an extreme weather event may create a potential hazard to the health and safety of the affected customer by putting the customer at risk of exposure to these extreme temperatures.

- b. ***The economic harm to property or the environment caused by the alleged violation.*** Commission Staff is not aware of any economic harm to property or the environment caused by the alleged violations outlined in this agreement.
- c. ***The history of previous violations.*** Commission Staff is not aware of a history of previous violations.
- d. ***The amount necessary to deter future violations.*** Commission Staff finds that the recommended administrative penalty is the appropriate amount to deter future recurrence of the alleged violations discussed herein.
- e. ***Efforts to correct the violations.*** Upon receipt of Commission Staff's results of the investigation concerning Frontier's alleged violations, Frontier conducted a thorough and multi-business unit review of operational practices associated with disconnection orders and identified process changes and enhancements to further increase safeguards and avoid authorizing disconnections for nonpayment during future extreme weather emergencies. The process changes and enhancements are detailed in numbers 15 and 16 above. Additionally, Frontier filed the affidavit required under 16 TAC § 25.483(b)(2)(B) shortly after Commission Staff notified Frontier of the results of its investigation.

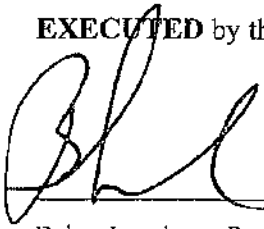
- f. *Any other matter that justice may require.* The recommended administrative penalty factored in consideration of Frontier's willingness to implement further protective measures to prevent future authorizations of disconnections for nonpayment during extreme weather emergencies. The recommended administrative penalty also was calculated with consideration toward the fact that none of the authorized disconnections for nonpayment were ultimately completed by the associated transmission and distribution utility. Finally, the outcome of Commission Staff's investigation considers that Frontier's current upstream parent corporation acquired the REP in 2019 and believed in good faith that the previous owners had fulfilled the requirements to permit the REP to order disconnection of service for nonpayment.

Other Terms

29. This agreement resolves all claims related to Commission Staff's investigation of Frontier concerning the alleged violation of 16 TAC § 25.483(b)(2)(B) and alleged violations of PURA § 39.101(h) and 16 TAC § 25.483(j), as described in this agreement and in the attached proposed order.
30. Unless specifically provided for in this agreement, Frontier waives any notice and procedures that might otherwise be authorized or required in this proceeding.
31. Nothing in this agreement shall limit Staff's ability to perform its enforcement functions as set forth in PURA and the Commission rules.
32. A party's support of the resolution of this docket in accordance with this agreement may differ from its position or testimony regarding contested issues of law, policy, or fact in other proceedings before the Commission or other forums. Because this is a settlement agreement, a party is under no obligation to take the same position as set out in this agreement in other proceedings not referenced in this agreement, whether those dockets present the same or a different set of circumstances. The parties' agreement to entry of a final order of the Commission consistent with this agreement should not be regarded as an agreement as to the appropriateness or correctness of any assumptions, methodology, or legal or regulatory principle that may have been employed in reaching this agreement.

33. The parties contemplate that this agreement will be approved pursuant to 16 TAC § 22.246(h)(1)(C). In the event the Commission materially changes the terms of this agreement, the parties agree that any party adversely affected by that material alteration has the right to request rehearing on the matters described in this agreement, thereby becoming released from its obligations arising hereunder, and to proceed as otherwise permitted by law to exercise all rights available under law. The right to request rehearing must be exercised by filing a written request in the proceeding within 25 calendar days of the date the Commission files the final, signed order acting on this agreement. Failure to file the request for rehearing within the specified time period shall constitute acceptance of the material changes to this agreement made by the Commission.
34. This agreement is the final and entire agreement between the parties regarding Commission Staff's investigation of Frontier concerning the alleged violations described herein and supersedes all other communications among the parties or their representatives regarding its terms.
35. Each person executing this agreement represents that he or she has been authorized to sign on behalf of the party represented. Copies of signatures are valid to show execution. If this agreement is executed in multiple counterparts, each is deemed an original, but all of which will constitute the same agreement.
36. Frontier warrants that it has read this agreement carefully, knows the contents thereof, and signs the same as its free act.

EXECUTED by the parties by their authorized representatives designated below.



Brian Landrum President
Frontier Utilities, LLC
601 Travis Street
Suite 1400
Houston, Texas 77002

Date: 10/10/2023



Barksdale English
Director, Division of Compliance and Enforcement
Public Utility Commission of Texas

Date: 11 Oct 2023

ATTACHMENT A: PROPOSED ORDER

DOCKET NO. 55642

SETTLEMENT AGREEMENT AND	§	PUBLIC UTILITY COMMISSION
REPORT TO THE COMMISSION	§	
REGARDING FRONTIER UTILITIES,	§	OF TEXAS
LLC’S ALLEGED VIOLATION OF	§	
PURA § 39.101(h), RELATED TO	§	
CUSTOMER SAFEGUARDS, AND 16	§	
TAC §§ 25.483(b)(2)(B), RELATED TO	§	
DISCONNECTIONS OF SERVICE, AND	§	
25.483(j), RELATED TO	§	
DISCONNECTION OF SERVICE	§	

PROPOSED ORDER

This Order addresses the agreement between Commission Staff and Frontier Utilities, LLC, relating to Commission Staff’s investigation of Frontier for alleged violations of PURA¹ § 39.101(h), relating to customer safeguards, and 16 Texas Administrative Code (TAC) §§ 25.483(b)(2)(B), related to disconnection of service, and 25.483(j), related to disconnection of service. The agreement also serves as a report to the Commission under 16 TAC § 22.246(h)(1). Commission Staff recommends that Frontier pay to the Commission an administrative penalty of \$88,500. Frontier agrees to pay the administrative penalty recommended by Commission Staff. The Commission approves the administrative penalty to the extent provided in this Order.

I. Findings of Fact

The Commission makes the following findings of fact.

Respondent

1. Frontier is a Texas limited liability company registered with the Texas secretary of state under file number 801527837.
2. Frontier is registered with the Commission as an Option 1 retail electric provider (REP) under REP certificate number 10169.

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001-66.016 (PURA).

Violations of 16 TAC § 25.498(b)(2)(B)

3. Prior to authorizing disconnections for non-payment of residential and small non-residential customers, Frontier was required to file in Project No. 29760² an affidavit from an officer of the company that affirmed that Frontier understood and had trained its personnel on the Commission's rule requirements related to disconnection and reconnection and had adequately tested all necessary electronic transactions related to disconnections and reconnections of service.
4. Frontier began authorizing disconnections for nonpayment of residential and small non-residential customers as early as 2009.³
5. Frontier could not provide evidence that the required affidavit had been filed prior to the date when Frontier began authorizing disconnections for nonpayment of residential and small non-residential customers.
6. Frontier filed the required affidavit in Project No. 29760 on August 3, 2023.⁴

Alleged Violations of PURA § 39.101(h) and 16 TAC § 25.483(j)

7. From November 1, 2020 through September 1, 2022, extreme weather emergencies were declared for 12 days in counties in which Frontier serves residential or small non-residential customers.
8. During the 12 days for which extreme weather emergencies were declared, Frontier authorized the disconnection of electric service for nonpayment for 90 customers located in counties affected by extreme weather emergencies to be completed during the pendency of the emergencies.
9. The transmission and distribution utilities that received Frontier's requests to disconnect service for nonpayment did not complete any of the authorized disconnections.

² *Compliance Filings Relating to Disconnection of Electric Service Pursuant to PUC Subst. R. 25.483(b)(2)(C)*, Project No. 29760 (pending).

³ *Id.*, Confidential – Disconnection for Non Payment Reports – May 2009-June 2009 Bate Stamp 1-3 (Jul. 15, 2009).

⁴ *Id.*, Item No. 2951, Affidavit (Aug. 3, 2023).

Notice

10. On January 3, 2023, Commission Staff provided Frontier with notice of the results of its investigation and provided information about Frontier's right to a hearing and an opportunity to explain its activities.
11. On July 25, 2023, Commission Staff provided Frontier with notice of the updated results of its investigation and provided information about Frontier's right to a hearing and an opportunity to explain its activities.

Evidentiary Record

12. On October 12, 2023, Frontier and Commission Staff filed a joint motion to admit evidence.
13. In Order No. __ filed on _____, 2023, the administrative law judge admitted into evidence the application for approval of a settlement agreement and all attachments filed on October 11, 2023.

Agreement

14. Frontier cooperated with Commission Staff's investigation.
15. Frontier neither admits to nor denies the allegations of violations detailed in this Order.
16. Commission Staff and Frontier entered into an agreement regarding the alleged violations described in this Order. Commission Staff recommended, and Frontier agreed to, the following:
 - a. Frontier will pay an administrative penalty of \$88,500.
 - b. Frontier has implemented the following protective measures to prevent future authorizations of disconnections for nonpayment during extreme weather emergencies, and will continue to implement such measures going forward:

1. **Additional Personnel Receiving NWS Alerts**

Frontier has increased the number of operations personnel who receive NWS emergency weather alerts. Frontier's current multi-step verification process now not only ensures all moratoriums are properly entered into internal systems but also utilizes two operations personnel to mitigate

potential human error. When it is determined that an extreme weather emergency is occurring, one operations personnel enters the moratorium(s) and another operations personnel checks what has been entered for accuracy before any disconnection for nonpayment orders are sent. Because Frontier has increased the number of personnel who receive NWS alerts, Frontier will also conduct cross training on the verification process to further prevent errors due to staff absence or turnover.

2. **In-Depth Disconnect/Reconnect Request Evaluation**

Frontier's increase in the number of operations personnel receiving NWS alerts has put Frontier in a better position to more proactively evaluate decisions surrounding disconnection requests and take actions to ensure all processes comply with Commission rules. Frontier continuously discusses processes and makes decisions related to extreme weather moratoriums in order to ensure compliance with Commission rules.

- c. Frontier will implement the following protective measures to further prevent future authorizations of disconnections for nonpayment during extreme weather emergencies:

1. **Seasonal Preparedness Meetings**

Frontier has implemented a plan to begin conducting seasonal preparedness meetings to review system processes, conduct additional as-needed trainings, and ensure all teams are prepared for potential future weather events while adhering Commission rules.

- d. Should Frontier authorize any disconnections for nonpayment during an extreme weather emergency to be completed during the pendency of the emergency going forward, Frontier will take all actions necessary to ensure that the disconnections are not completed, including submission of precautionary reconnect orders.
- e. Frontier agrees to maintain compliance with Commission rules governing extreme weather emergencies going forward.

17. On October 11, 2023, Commission Staff filed a copy of the executed agreement with the Commission's filing clerk.

Seriousness of Violations and Alleged Violations

18. When a REP fails to file a required affidavit attesting to compliance with certain Commission rules, the REP bypasses one of the Commission's mechanisms for ensuring compliance with such rules.
19. A REP authorizing disconnection of service to retail customers during an extreme weather emergency causes a hazard or potential hazard to the health and safety of the public by putting customers at risk of exposure to extreme temperatures.

Compliance History and Deterrence of Future Violations

20. Commission records do not indicate a history of investigations of Frontier related to disconnection of service.
21. The agreed administrative penalty of \$88,500 is sufficient and necessary to deter future recurrences of similar events related to disconnections for nonpayment during extreme weather emergencies.

Informal Disposition

22. More than 15 days have passed since completion of all notice requirements.
23. No person filed a protest or motion to intervene.
24. Frontier and Commission Staff are the only parties to this proceeding.
25. No party requested a hearing, and no hearing is needed.
26. Commission Staff recommended approval of the agreement.
27. This decision is not adverse to any party.

II. Conclusions of Law

The Commission makes the following conclusions of law:

1. The Commission has jurisdiction over this matter under PURA §§ 14.001, 14.051, 14.054, 15.023, 15.024, 39.101(h), and 39.357.
2. Frontier is a REP as that term is defined under PURA § 17.002(6) and 16 TAC § 25.5(114).

3. Under 16 TAC § 25.483(b)(2)(B), prior to authorizing disconnections for non-payment of residential and small non-residential customers, Frontier was required to file an affidavit from an officer of the company, in a project established by the Commission for this purpose, affirming that the REP understood and had trained its personnel on the Commission's rule requirements related to disconnection and reconnection, and had adequately tested all necessary electronic transactions related to disconnections and reconnections of service.
4. Commission staff asserts that Frontier violated 16 TAC § 25.483(b)(2)(B) by failing to file the required affidavit before authorizing disconnections for nonpayment of residential and small non-residential customers.
5. Under PURA § 39.101(h), a REP may not disconnect service to a residential customer during an extreme weather emergency or on a weekend day.
6. Under 16 TAC § 25.483(j), a REP having disconnection authority under the provision of subsection (b) of that section shall not authorize a disconnection for nonpayment of electric service for any customer in a county in which an extreme weather emergency occurs.
7. Under 16 TAC § 25.483(j)(1), an extreme weather emergency is defined as a day when "the previous day's highest temperature did not exceed 32 degrees Fahrenheit, and the temperature is predicted to remain at or below that level for the next 24 hours anywhere in the county, according to the nearest NWS reports; or the NWS issues a heat advisory for a county, or when such advisory has been issued on any one of the preceding two calendar days in a county."
8. Commission staff asserts that, from November 1, 2020 through September 1, 2022, Frontier violated PURA § 39.101(h) and 16 TAC § 25.483(j) when it authorized the disconnection for nonpayment of electric service for 90 customers located in counties under extreme weather emergencies to be completed during the pendency of the emergencies.
9. Under PURA § 15.023, the Commission has authority to impose administrative penalties against Frontier for violations of PURA and Commission rules.

10. Under 16 TAC § 25.8(b)(2)(B), Commission Staff asserts that the alleged violation of 16 TAC § 25.483(b)(2)(B) is a Class B violation.
11. Under 16 TAC § 25.8(b)(2)(A), the Commission may impose a penalty of up to \$5,000 per violation per day for a Class B violation.
12. Under 16 TAC § 25.8(b)(3)(B), Commission Staff asserts that the alleged violations of PURA § 39.101(h) and 16 TAC § 25.483(j) are Class A violations.
13. Under 16 TAC § 25.8(b)(3)(A), the Commission may impose a penalty of up to \$25,000 per violation per day for a Class A violation.
14. Frontier was provided proper notice of Commission Staff's investigation into this matter, the results of the investigation, information about Frontier's right to a hearing, and an opportunity to explain its activities, as required by 16 TAC §§ 22.241(a)(2) and 22.246(f)(2).
15. The filing of the agreement meets the requirements of 16 TAC § 22.246(h)(1).
16. The Commission processed this docket in accordance with the requirements of applicable statutes and Commission rules.
17. The requirements for informal disposition under 16 TAC § 22.35 have been met in this proceeding.

III. Ordering Paragraphs

In accordance with these findings of fact and conclusions of law, the Commission issues the following orders:

1. The Commission approves the administrative penalty to the extent provided in this Order.
2. Frontier must comply with the terms of the agreement and this Order.
3. Frontier must pay an administrative penalty in the amount of \$88,500 to the Commission. Frontier is required to remit payment of the full amount of the administrative penalty on or before 30 calendar days after the date the Commission signs this Order. Payment of the administrative penalty may be made by check payable to the Public Utility Commission of Texas. The check must reference this docket and must be sent to the following address:

Public Utility Commission of Texas

ATTN: Fiscal Services
PO Box 13326
Austin, TX 78711-3326

4. Frontier must file, in this docket, an affidavit of payment of the administrative penalty no later than five calendar days after remitting payment.
5. Frontier must continue its efforts to prevent authorization of disconnection for non-payment of electric service during extreme weather emergencies.
6. The Commission is not constrained in any matters from requiring additional action or penalties from matters that are not resolved by this Order.
7. This Order resolves only the claims identified in this Order.
8. Entry of this Order does not indicate the Commission's endorsement or approval of any principle or methodology that may underlie the Agreement and must not be regarded as precedential as to the appropriateness of any principle or methodology underlying the Agreement.
9. The Commission denies all other motions and any other requests for general or specific relief, if not expressly granted.

Signed at Austin, Texas the _____ day of _____ 2023.

PUBLIC UTILITY COMMISSION OF TEXAS

KATHLEEN JACKSON, INTERIM CHAIR

WILL MCADAMS, COMMISSIONER

LORI COBOS, COMMISSIONER

JIMMY GLOTFELTY, COMMISSIONER