



Control Number: 56545



Item Number: 152

Thomas J. Gleeson
Chairman

Lori Cobos
Commissioner

Jimmy Glotfelty
Commissioner

Kathleen Jackson
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Courtney K. Hjaltman
Commissioner



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Public Utility Commission of Texas

TO: Chairman Thomas J. Gleeson
Commissioner Lori Cobos
Commissioner Jimmy Glotfelty
Commissioner Kathleen Jackson
Commissioner Courtney K. Hjaltman

All Parties of Record

A handwritten signature in black ink, appearing to be "SJC".

FROM: Shelah Cisneros, Commission Counsel

DATE: 17 October 2024

RE: October 24, 2024 Open Meeting – Item No. 27
Docket No. 56545; SOAH Docket No. 473-24-18029 – *Application of Oncor Electric Delivery Company LLC for Approval of a System Resiliency Plan*

A revised proposed order in the above referenced docket is posted for consideration and action by the Commission. If the Commission approves the revised proposed order, I recommend the following changes:

Findings of fact 9 should be modified for completeness and to support the conclusion of law related to the sufficiency of notice.

9. No party challenged the sufficiency of notice of the application, and Oncor used a reasonable method of notice.

Additional findings of fact describing the proposed resiliency measures should be added before findings of fact 38, 41, 44, 46, 48, 50, and 52 for completeness and context.¹ Subsequent findings of fact should be renumbered.

¹ Application of Oncor Electric Delivery Company LLC for Approval of a System Resiliency Plan at Bates 4 (May 6, 2024).



- XX. Oncor proposed to harden and modernize distribution overhead facilities through programs such as pole-loading-capability enhancement, lightning protection, and replacement of vulnerable legacy design equipment.
- XX. Oncor proposed to harden and modernize the underground distribution system by replacing or rehabilitating vulnerable cable segments and equipment to meet the current resiliency standards.
- XX. Oncor proposed to modernize the distribution system to enable self-healing, enhanced backstand capabilities (the creation of sufficient system capacity to allow customer load to be transferred to an alternate source when a sustained fault occurs), and to withstand elevated electrical loading due to extreme temperatures. Oncor proposed to enable automated reconfiguration of the distribution system to isolate damaged areas and minimize impact from resiliency events. Oncor proposed to use an expanded fleet of mobile transformers where applicable.
- XX. Oncor proposed to expand the existing vegetation management program to include all applicable laterals. Oncor also proposed to leverage technology to assess risk conditions and address vegetation management needs across the distribution system.
- XX. Oncor proposed to enhance its risk modeling capabilities and expand asset management to mitigate ignition risk and protect Oncor assets from wildfires.
- XX. Oncor proposed to implement physical security at critical facilities and expand situational awareness technology solutions.
- XX. Oncor proposed to strengthen Oncor's digital grid through enhanced network operations center and security operations center capabilities, data center enhancements, implementation of private broadband communications, communications backhaul enhancements, station local area network communications enhancements, and dedicated strategy and governance functions.

An additional finding of fact should be added after finding of fact 54 for completeness to describe the agreed evaluation metrics and criteria.²

- ##. The evaluation metrics and criteria will include metrics for the following: resiliency index; normalized event impact; underperforming area focus; system outage minutes; system restoration duration; wildfire mitigation zone outage events; suspicious activity count; repeated theft count; enhanced SCADA cyber resiliency; enhanced distribution automation cyber

² Agreement at Attachment 2 (Aug. 16, 2024).

resiliency; enhanced advanced metering systems cyber resiliency; enhanced mobile workforce cyber resiliency; cyber training hours count; cyber event simulations count; and failover test count.

Conclusions of law 5, 8, 9 should be modified for specificity and to cite the relevant Commission rule.

5. Oncor's system resiliency plan uses methods~~was filed~~ in compliance with PURA § 38.078(b) and 16 TAC § 25.62(c)(1) and explains a systematic approach for the plan's implementation in compliance with PURA § 38.078(c) and 16 TAC § 25.62(c)(2)(E).
8. The Commission evaluated Oncor's system resiliency plan, as modified by the agreement, in accordance with the requirements of PURA § 38.078(d) and 16 TAC § 25.62(d)(4)(A) and (B).
9. Oncor's system resiliency plan, as modified by the agreement, is in the public interest under PURA § 38.078(e) and 16 TAC § 25.62(d)(4)(C) and should be approved.

Two new conclusions of law should be added after conclusion of law 6 for completeness.

##. Oncor's application is sufficient, in compliance with 16 TAC § 25.62(d)(2).

##. The Commission must approve, deny, or modify Oncor's system resiliency plan no later than 180 days after the plan was filed, in accordance with PURA § 38.078(e) and 16 TAC § 25.62(d)(3).

A new conclusion of law should be added after conclusion of law 9 for completeness.

##. The evaluation metrics and criteria in Oncor's proposed system resiliency plan, as modified by the terms of the agreement, meet the requirements of 16 TAC § 25.62(c)(2)(C).

Additionally, the Commission should delegate to the Office of Policy and Docket Management the authority to modify the order to conform to the Citation and Style Guide for the Public Utility Commission of Texas and to make other non-substantive changes to the order for such matters as capitalization, spelling, grammar, punctuation, style, correction of numbering, and readability.