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INVESTIGATION OF EMERGENCY PREPAREDNESS AND RESPONSE BY UTILITIES IN HOUSTON AND SURROUNDING COMMUNITIES PUBLIC UTILITY COMMISSION

OF TEXAS

GUADALUPE VALLEY ELECTRIC COOPERATIVE'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TARGETED ELECTRIC CO-OPS OUESTION NOS. STAFF 1-1 THROUGH 1-120

TO: John Lajzer, Public Utility Commission of Texas, 1701 N. Congress Ave., Austin, Texas 78711

Guadalupe Valley Electric Cooperative, Inc. ("GVEC") files these responses to Commission Staff's First Request for Information to Targeted Electric Co-ops, Question Nos Staff 1-1 through 1-120 ("Staff's First RFIs to Co-ops"). Commission Staff directed that responses to Staff's First RFIs to Co-ops be filed by August 30, 2024, thus these responses are timely filed. GVEC stipulates that its responses may be treated by all parties as if they were filed under oath.

Dated: August 30, 2024

Respectfully Submitted,

/s/ Jacob Lawler

Mark C. Davis State Bar No. 05525050 Adrianne M. Waddell State Bar No. 24098556 Jacob J. Lawler State Bar No. 24076502 **HOLLAND & KNIGHT, LLP** 98 San Jacinto, Suite 1900 Austin, Texas 78701 (512) 472-1081 OFFICE (512) 472-7473 FAX Mark.Davis@hklaw.com Adrianne.Waddell@hklaw.com Jacob.Lawler@hklaw.com

<u>STAFF 1-1</u>

Provide the following information concerning the last hurricane or major storm drill conducted in 2024:

- a. The date the drill was conducted;
- b. The category of hurricane drilled and any conditions (e.g., where the hurricane made landfall, date hurricane made landfall, status of infrastructure and vegetation management activities in affected area, aid received vs aid requested from mutual assistance programs, total number of customers in anticipated affected area) used in the drill;
- c. A description as to how the drill conducted in 2024 differed materially from the previous annual drill;
- d. The identity of all third-party vendors that assisted in either conducting or preparations for the 2024 hurricane drill;
- e. The identity of all other electric, water, sewer, or telecommunication utilities that were invited to participate in your 2024 hurricane drill and a description of their participation;
- f. The identity of all local government, trade associations, medical and eldercare facilities, community organizations, PGCs, and REPs that were invited to participate in your 2024 hurricane drill and a description of their participation;
- g. How performance during the 2024 hurricane drill was measured; and
- h. Any feed-back whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.

RESPONSE:

Regarding the last hurricane or major storm drill conducted in 2024:

a. GVEC's conducted its last drill or "Summer Tabletop exercise" on June 12, 2024.

b. GVEC's 2024 Summer Tabletop exercise did not specifically address a categorical hurricane. However, GVEC's 2023 Summer Tabletop exercise did include a Category 3 hurricane making landfall in the Corpus Christi area. In the 2023 Summer Tabletop exercise, GVEC identified damage to electrical infrastructure (pole breaks, communication towers, and substations) that affected approximately 27,157 members. GVEC identified contractors to assist with restoration efforts in this drill.

Historically GVEC has conducted Summer Tabletop exercises in June in preparation for summer weather conditions as well as impacts from a hurricane affecting the GVEC service area.

c. The drill conducted in 2024 scaled back the hurricane impact as the tabletop exercises were unrealistic as to their overstated effect on GVEC's service area.

d. GVEC utilizes Texas Electric Cooperatives, Inc. ("TEC") as the material supplier & warehouse operators. TEC was invited and attended GVEC's 2024 Summer Tabletop exercise. GVEC also has several emergency response agreements in place with various electric contractors to assist with restoration efforts.

e. GVEC did not include other public utility providers in its 2024 Summer Tabletop exercise.

f. GVEC did notify Texas Division of Emergency Management of its intent to conduct the 2024 Summer Tabletop exercise.

g. Performance during the 2024 Summer Tabletop exercise was measured based on electric service restored.

h. TEC provided feedback regarding their strategic staging of material to aid their member cooperatives.

SPONSOR:

<u>STAFF 1-2</u> Do you ever seek participation of your customers during a hurricane drill? If yes, please provide a description of their level of involvement.

RESPONSE:

GVEC has historically not included members of the cooperative during the tabletop exercise. There are members of the cooperative that are employees that would be included in the tabletop exercises.

SPONSOR:

- **STAFF 1-3** Are actual events and conditions experienced during a previous hurricane or storm used in the next year's hurricane or major storm drill? If yes:
 - a. How long would an actual storm be used to set the conditions for future hurricane drills?
 - b. What hurricanes and major storms were used to set the conditions for the 2024 hurricane drill?

RESPONSE:

Yes, to the extent such occur within the previous year. GVEC generally encourages attendees to discuss how actual events impacted them both professionally and personally. The most recent hurricane that affected the GVEC territory was Hurricane Harvey in 2017. No hurricanes or major storms were used to set the conditions for the 2024 Summer Tabletop exercise.

SPONSOR:

<u>STAFF 1-4</u> Please identify any electric, water, sewer, or telecommunication utilities that invited you to participate in their 2024 hurricane or major storm drill.

RESPONSE:

GVEC was not invited to participate in the drill of any other electric, water, sewer, or telecommunication utilities.

SPONSOR:

STAFF 1-5 Please identify all resources, internal or external, used for weather or storm tracking purposes before July 8, 2024.

RESPONSE:

GVEC receives notification from the National Weather Service regarding weather forecasted to impact the South Central Texas Area. That information is then shared with all cooperative employees. Additional notices come from GVEC's Transmission Operator (LCRA) and their meteorologist Bob Rose. More frequent internal communications occur as the storms advance toward the Texas coast.

SPONSOR:

<u>STAFF 1-6</u> How many days before projected landfall do you start tracking storms that could affect or disrupt operations within your service area?

RESPONSE:

GVEC starts tracking as soon there's a notification from the National Weather Service or its Transmission Operator (LCRA). See also Staff 1-5. The amount of days before projected landfall will vary. GVEC's response to any storms is guided by its Emergency Operations Plan ("EOP") on file with the PUCT.

SPONSOR:

<u>STAFF 1-7</u> How many days before projected landfall did you start tracking the storm eventually named Hurricane Beryl?

RESPONSE:

The first National Weather Service report on Hurricane Beryl was sent out on July 1, 2024 at 3:01 PM. GVEC's executive team began tracking the storm by 3:07PM.

SPONSOR:

<u>STAFF 1-8</u> Do you check the functionality or performance of your outage tracker as part of your regular storm preparation procedures?

RESPONSE:

The outage tracker is checked for functionality on a continuous basis. The outage tracker is housed in GVEC's control center that is monitored 24/7, 365 days a year.

SPONSOR:

<u>STAFF 1-9</u> How far in advance of landfall did you initiate requests for mutual assistance?

RESPONSE:

GVEC did not initiate requests for mutual assistance for Hurricane Beryl as it remained in the Advisory Level per its EOP.

SPONSOR:

STAFF 1-10 Provide information as to how restoration efforts are prioritized, and resources are allocated following a hurricane or major storm. For purposes of this question, please provide how these prioritizations and allocation guidelines were used in practice during your response to Hurricane Beryl.

RESPONSE:

Restoration efforts are prioritized in accordance with Section X of the GVEC's EOP regarding Restoration Procedures & Load Shed/Curtailment Priorities. Generally, restoration efforts are prioritized in three main areas by the following:

- 1) Transmission Lines and Equipment
 - a. Switching Coordinated/Directed by LCRA SOCC
- 2) Substations
 - a. Transmission Switching LCRA SOCC
 - b. Distribution Switching GVEC Control Center
- 3) Distribution
 - a. Three Phase Main Line Distribution
 - b. Single Phase Main Line Distribution
 - c. Three Phase Taps
 - d. Single Phase Taps
 - e. Transformers and Services
 - f. Fiber Optic Cables, Lines, and wireless Equipment

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-11 Describe the procedures during an emergency for handling complaints and for communicating with the public; the media; customers; the commission; the Office of Public Utility Counsel (OPUC); local and state governmental entities, officials, and emergency operations centers, the reliability coordinator for your Company's power region; and critical load customers directly served by the entity.

RESPONSE:

New or press releases: The Senior Executive Manager of Marketing or their appointed representative is authorized to approve any such news releases. All personnel are advised to inform them of any newsworthy information about an employee, manager, director, or event in which the Cooperative is involved. The Senior Executive Manager of Marketing is responsible for recommending such information to the C.E.O. for release to all pertinent media sources.

News media inquiries: The Senior Executive Manager of Marketing is authorized to be the official spokesman for the Cooperative when inquiries are received or when it is necessary for the Cooperative to make a statement of position or explanation. The C.E.O. will determine when such statements should be made. In their absence, the C.E.O. may designate a representative.

Social Media and Website Updates: The primary communications routes used to notify and inform GVEC membership, customers and the public of a disaster or emergency are Facebook, Twitter, Instagram, email, the GVEC website, radio, text messaging, and television. Authorized representatives shall use these forms of media before, during and following the roll out of this Emergency Operations Plan. The C.E.O. and Senior Executive Managers shall coordinate on when and how often notices shall be posted. All media releases shall be screened for accuracy and content.

Customer Complaints and Inquiries: Customer complaints will be handled on a case-by-case basis and will be directed to call customer service for assistance.

Regulatory: Local, State, PUCT, ERCOT, OPUC, other emergency operations centers, and Regulatory officials can call the Senior Executive Manager of Compliance, or other emergency contact(s) listed in GVEC's Emergency Operations Plan, and will be routed to the appropriate area.

SPONSOR:

STAFF 1-12 Does your company use an operating condition system? If yes, define each level of the operating condition system and actions taken at each level. Please include citations to the relevant section(s) of your EOP filed with the PUCT when answering this question.

RESPONSE:

Yes, please refer to GVEC's Emergency Operations Plan ("EOP") Section V (beginning on page 10).

The operating conditions are as follows:





SPONSOR:

STAFF 1-13 Explain the system and tools used to manage all emergency response assignments. Your response should include management of mutual assistance and contract personnel and consider needed food and lodging facilities.

RESPONSE:

GVEC uses its EOP to manage all emergency responses assignments. Please refer to the Emergency Operations Plan as a whole and specifically Section XIV. Use of Contractors and Mutual Assistance Resources.

SPONSOR:

STAFF 1-14 How far in advance of the May 2024 Derecho and Hurricane Beryl did you initiate emergency preparations? Describe the timeframes for the preparation work in anticipation of emergency operations plan activation. Please include citations to the relevant section(s) of your EOP filed with the PUCT when answering this question.

RESPONSE:

GVEC did not need to initiate its EOP for the May 2024 Derecho.

GVEC went into an Advisory Level per its EOP on July 5, 2024 at 12:59 PM for Hurricane Beryl. GVEC did not need to activate any further emergency actions past the Advisory Level. Please refer to GVEC's EOP Section V.

GVEC's service area was not impacted by May 2024 Derecho or Hurricane Beryl.

SPONSOR:

<u>STAFF 1-15</u> Please provide a timeline of your Company's response to the May 2024 Derecho and Hurricane Beryl.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-16 Please detail the extent and duration of outages experienced by your customers during and in the aftermath of the May 2024 Derecho and Hurricane Beryl. Include the total number of customers affected; minimum, maximum, and average hours of service interruptions; and maximum and average time to service restoration in your response.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-17 Provide the following information concerning your service territory:

- a. Identify the geographic areas that experienced the highest number of outages and longest duration of outage due to the May 2024 Derecho. Your response should identify the neighborhood, city, zip code, and county if possible.
- b. Identify the geographic areas that experienced the highest number of outages and longest duration of outage due to the Hurricane Beryl. Your response should identify the neighborhood, city, zip code, and county if possible.
- c. Identify or describe the factors that contributed to the areas identified in response to subparts (a) and (b) as being particularly vulnerable.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-18 Describe any challenges in restoring operations your Company encountered due to the May 2024 Derecho or Hurricane Beryl.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-19 Please provide a copy of the after-action reports or provide a date by when the action reports will be completed for the May 2024 Derecho and Hurricane Beryl.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

<u>STAFF 1-20</u> Please provide any additional information and describe any concerns that may be helpful to this investigation.

RESPONSE:

Not applicable.

SPONSOR:

Electric Utilities Communication and Coordination

- STAFF 1-21 Provide the following information concerning the communication strategy and policy in place before July 8, 2024:
 - a. What consideration is given to local governments, community organizations, and other electric, water, sewer, and telecommunication utilities concerning your communication strategy after a hurricane or major storm in your service territory?
 - b. Describe any augmentation to staffing at call centers or help desks that would occur in advance of or after a hurricane or major storm entered your service territory.
 - c. For transmission and distribution utilities, please describe how your company coordinates communication to end-use customers with retail electric providers.

RESPONSE:

a) GVEC staff works year-round to communicate with its general membership as well as develop relationships with key stakeholders in local governments, community organizations, and other utilities on what to expect and who to contact in an electric-related emergency. Marketing generates mass communications in diverse mediums, while Community and Government Relations, Safety and Compliance, Commercial and Industrial Accounts, and other GVEC Officers, Executives, and Managers communicate directly with specific organizations, contacts, or other utilities as relevant to the situation.

GVEC utilizes a formal Communications Plan to supplement its overall Cooperative Emergency Operations Plan before, during, and after emergencies occur. The plan flowchart includes the timing and mediums used to communicate at various points and to specific audiences within the emergency. This plan includes communicating with the full membership (including critical care and critical load customers) and to specific areas as necessary.

Before a hurricane or storm, approximately 1-3 days out, social media is used for general awareness posts from GVEC with emergency information, outage reporting resources and processes, and related electrical safety tips. GVEC also shares important informational updates from weather outlets and community organizations. Depending on the expected severity, GVEC also utilizes emails to the entire membership.

During an emergency, depending on the volume and duration of outages or circumstances, social media updates are posted, email and TextPower (texting outbound messages) may also be utilized. If it is expected that outages will last for 48 hours or more, website emergency messages, press releases may be sent to local media and posted on the website with ongoing updates in all mediums.

After an emergency, depending on the severity, GVEC will use the same mediums listed above to communicate with affected members as necessary on outage restoral and any other important information that must be relayed.

- b) Specified marketing staff are on call 24/7 each week to communicate in emergency situations. In major occurrences, the entire marketing staff will be put on standby for coverage as necessary.
- c) GVEC does not transact with retail electric providers.

SPONSOR:

STAFF 1-22 Describe your communication strategy with the public before, during, and after the May 2024 Derecho and Hurricane Beryl and by what means these communications were conducted.

RESPONSE:

GVEC utilized social media to communicate before, during, and after Hurricane Beryl. Communications began July 6 with outage updates on related area storms caused by Beryl approaching, continued July 7-8 with storm progress updates from the National Weather Service and Hurricane Prep tips. As the storm moved to the East and bypassed GVEC's service area, the last post included a storm update and reassurance post GVEC staff was ready for any storm on July 8th.

SPONSOR:

STAFF 1-23 Please provide any available data regarding customer feedback you received in response to your service restoration efforts during and in the aftermath of Hurricane Beryl.

RESPONSE:

Comments received were supportive of the information and complimentary to GVEC's staff and service. Local organizations as well as national organizations such as NRECA were noted engaging in liking posts and also resharing them in some cases.

SPONSOR:

STAFF 1-24 What steps are being taken to improve coordination and communication with local governments, medical and eldercare facilities, community organizations, trade associations, and other similar organizations for future significant weather events?

RESPONSE:

The implementation of GVEC's Communications supplemental flow chart to its Emergency Operations Plan in 2018 has provided clear direction of the steps to be taken in an emergency. This coupled with the year-round focus on relationship building by all areas and strong internal communications and bi-annual training has proven to be an effective strategy for GVEC thus far.

SPONSOR:

STAFF 1-25 What steps are being taken to improve coordination and communication with other electric, water, sewer, and telecommunication utilities for future significant weather events?

RESPONSE: GVEC has worked with some of the local Water Supply companies for water needs with critical loads to try and ensure they are flagged as critical and limited with rotational outages. In addition to that, GVEC has worked with one municipal fire department to provide remote housing/staging for emergency vehicles and their personnel during winter events that can block off road access from local branches.

SPONSOR:

- **STAFF 1-26** Provide the following information concerning call centers and help desks used by your company before July 8, 2024:
 - a. How many people work in call centers or help desks?
 - b. Of these people, please provide the percentage of these employees that are full-time employees (FTE), contracted labor, or temporary/seasonal workers.
 - c. What is the target wait time or response time for calls?
 - d. What is the target resolution time for calls?
 - e. Provide a detailed description of company-specific training provided to call center and help desk operators concerning major outages and major weather events including, but not limited to, hurricanes and high wind events.
 - f. What is the maximum call volume for the call centers of help desks that were available and in operation during or in the aftermath of Hurricane Beryl?

RESPONSE:

- a) 43
- b) 41 FTE, 2 PT
- c) 90% of calls answered within 30 seconds, 95% of calls answered in under one minute, and 97% of calls answered in under 2 minutes.
- d) GVEC does not have a target but on average, the call resolution is about 4 minutes.
- e) All employees are familiar with GVEC's EOP. The office managers meet with each team in the call centers to discuss and train on current emergency situations, what to expect, make sure the outage management and backup systems are ready and understand how to use them. GVEC constantly updates these teams with information from the operations and marketing department about the current situation, outage timeframes, if anything is changing, wording to members, etc. It's an ongoing communication during major outage events with the call center personnel being constantly updated.
- f) GVEC phone lines can handle about 1500+ calls and GVEC can burst up and double that in emergency situations. The IVR can handle 120 calls at a time so when people call in, 120 can report an outage through the IVR around the same time.

SPONSOR:

STAFF 1-27 Provide the daily average and peak call volume to your call centers or help desks during or in the aftermath of Hurricane Beryl. For purposes of this question, please provide responses for each day from July 8, 2024, through the date power was restored to at least 99% of the customers in the service territory in the Impacted Area.

RESPONSE:

Daily average calls is about 840/day, however GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-28 Describe how you communicated and shared information on recovery resources and updates with local and state leaders as well as your customers during leading up to, during, and in the aftermath of Hurricane Beryl.

RESPONSE:

This was not necessary for GVEC since the storm did not actually hit its service territory.

SPONSOR:

STAFF 1-29 Please indicate whether calls incoming to your call centers, help desks, or priority call desks are recorded, and if so, provide your retention schedule for the captured calls.

RESPONSE:

Calls are recorded and stored for 90 days.

SPONSOR:

STAFF 1-30 If calls incoming to your priority call desks are not recorded, please indicate if incoming calls are logged or otherwise tracked. If tracked or logged, please provide a copy of all logged or otherwise tracked calls to the priority call desk during or in the aftermath of Hurricane Beryl.

RESPONSE:

Not applicable – they are recorded.

SPONSOR:

STAFF 1-31 Please provide an audio copy and transcript of any pre-recorded messages related to either the May 2024 Derecho or Hurricane Beryl used by your call centers or help desks and the date these messages were utilized.

RESPONSE:

GVEC has a standard outage IVR message that is modified in the event of an emergency situation. GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

- **STAFF 1-32** Provide the following information concerning the outage tracker in use on July 8, 2024:
 - a. The date the outage tracker was rolled out to customers.
 - b. The last date the software underpinning the outage tracker was updated.
 - c. whether the outage tracker was functioning during the May 2024 Derecho and Hurricane Beryl as intended or provide an explanation as to why not.
 - d. Whether the outage tracker was mobile-friendly;
 - e. the languages supported by the outage tracker;
 - f. Whether the outage tracker captured circuit-specific or meter-specific information or both.
 - g. Whether the outage tracker was cloud-based or operated through an onpremise server?
 - h. The maximum number of simultaneous users the outage tracker was designed to accommodate.
 - i. Whether you had internal facing redundancies/contingencies for outage tracking, and if so if these redundancies/contingencies were utilized during your response to Hurricane Beryl.
 - j. The date of the last stress or load test of the outage tracker.

RESPONSE:

- a. The outage tracker has been in place since 2015. It is part of GVEC's Milsoft setup that links directly to its OMS system.
- b. The last software update on the Milsoft system was April 4, 2024, when the Milsoft OMS server was updated.
- c. The outage viewer was operational in both the May 2024 Derecho and Hurricane Beryl.
- d. The outage tracker is Mobile friendly. It is available through web browser and the GVEC smarthub app.
- e. The layout of the outage viewer is English, but since it utilizes the web browser, the customer can change the language settings in the browser to change the language.
- f. The outage tracker works by showing the number of meters out in a given area of the GVEC's boundary.
- g. The outage tracker is web-based, but does run on a local on-premise server.
- h. The outage tracker is designed to accommodate over 4 million connections.
- i. GVEC has an internal outage viewer as well, this is set up the same way as the external, however the internal map viewer has more data related to the outages and locations than released on the external facing outage viewer.
- j. Not Applicable.

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SPONSOR:

STAFF 1-33 Provide daily total and peak numbers of users accessing your outage tracker in the greater Houston area during each day of the May 2024 Derecho event.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-34 Provide the daily total and peak number of users accessing your outage tracker in the Impacted Area starting from July 8, 2024 through the date service was restored to 100% of your service territory.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-35 Describe any processes or policies adopted by your company as contingencies to inform customers about service outages and estimated restoration times in the event the outage tracker is offline.

RESPONSE:

Other ways customers can get information are by using:

- A. Text Power, which they can text in to get status on the outages.
- B. Call in and report an outage on GVEC's IVR, and if there is an existing outage logged for that location it will give them the status of the outage.
- C. Call in and speak with a customer service representative and they can give them a status update on their current outages.

SPONSOR:

STAFF 1-36 Please indicate if the processes or policies described in your response to Staff 1-35 were utilized during either the May 2024 Derecho event or in the aftermath of Hurricane Beryl. If they were, please identify the dates the identified processes and policies were activated.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-37 Please provide a breakdown of smart meters currently in service for each county in your service territory that was included within the Impacted Area. In providing a response to this question, please provide both raw numbers and answers as a percentage of total customers in each county.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

<u>STAFF 1-38</u> Provide the date and method (e.g., email, phone call, text message) you initially contacted local governments in the Impacted Area.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-39 Describe what processes, if any, you had in place on or before July 8, 2024, to contact medical and eldercare facilities or critical infrastructure (e.g., police stations, firehouses, TV stations) in advance of a hurricane or major storm. Please include citations to the relevant section(s) of your EOP filed with the PUCT when answering this question.

RESPONSE:

Prior to the event and upon activating the EOP, GVEC sends email notice to all critical accounts as needed in the days leading up to the event. In addition, GVEC will use phone/text to communicate to critical infrastructure accounts that are most likely to be affected. GVEC maintains open lines of communication during the event, and following the disaster until power is restored. After restoration, communications are sent to ensure facilities are fully operational.

Please refer to Section VII. Assignments and Expectations of GVEC's EOP, specifically page 31, "Commercial and Industrial Accounts Team".

SPONSOR:

STAFF 1-40 If your company has a process to contact critical care facilities, provide the date and method (e.g., email, phone call, text message) you initially contacted medical facilities, eldercare facilities, or critical infrastructure (e.g., police stations, firehouses, TV stations) in advance of Hurricane Beryl.

RESPONSE:

GVEC remained at the Advisory Level per its EOP for Hurricane Beryl.

SPONSOR:

STAFF 1-41 Please describe how you communicate and with what frequency you communicate with critical care and at-risk customers about service outages and restoration efforts.

RESPONSE:

GVEC follows all procedures in its EOP and uses reasonable efforts to contact critical care customers about an event and give updates on power restoration efforts. GVEC works with the customer to identify possible solutions should power restoration efforts not meet the customer's needs. Solutions can include requesting the customer to obtain an emergency generator, call 911 and/or go to the local hospital until power is restored.

SPONSOR:

<u>STAFF 1-42</u> For ERCOT-located utilities, please describe any communication with interconnected power generation companies regarding their operational status during Hurricane Beryl.

RESPONSE:

GVEC remained at the Advisory Level per its EOP for Hurricane Beryl.

SPONSOR:

Electric Utilities – Customer Restoration Workflow

STAFF 1-43 Please state whether you have a service restoration plan regarding service outages caused by extreme or emergency weather events. If you do, please provide a copy of that plan(s). Please include citations to the relevant section(s) of your EOP filed with the PUCT when answering this question.

RESPONSE:

Yes, GVEC follows its EOP regarding restoration efforts caused by extreme or emergency weather events. Restoration efforts are prioritized in accordance with Section X of the GVEC's EOP regarding Restoration Procedures & Load Shed/Curtailment Priorities. Generally, restoration efforts are prioritized in three main areas by the following:

- 1) Transmission Lines and Equipment
 - a. Switching Coordinated/Directed by LCRA SOCC
- 2) Substations
 - a. Transmission Switching LCRA SOCC
 - b. Distribution Switching GVEC Control Center
- 3) Distribution
 - a. Three Phase Main Line Distribution
 - b. Single Phase Main Line Distribution
 - c. Three Phase Taps
 - d. Single Phase Taps
 - e. Transformers and Services
 - f. Fiber Optic Cables, Lines, and wireless Equipment

SPONSOR:

STAFF 1-44 Please describe the procedures followed for customer restoration of service, including prioritization criteria and timelines for restoration or service. Please note if these policies may lead to quicker restoration of service for an area of your service territory relative to the others and why.

RESPONSE:

See response to STAFF 1-43.

SPONSOR:

STAFF 1-45 Please describe and explain any changes or modifications made to your service restoration plan(s) during and in the aftermath of the May 2024 Derecho or Hurricane Beryl.

RESPONSE:

GVEC was not impacted by May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-46 Please provide a county-by-county summary of date on which and number of damage assessment, vegetation, and linemen crews that you deployed to assess and begin service restoration efforts after Hurricane Beryl made landfall in the Impacted Area.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-47 Please provide a county-by-county summary of the percentage of your customers that did not have service due to outages caused by Hurricane Beryl for each day from the day Hurricane Beryl made landfall in the Impacted Area to when service was fully restored to your customers.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

<u>STAFF 1-48</u> Please describe how calls received by your call centers during and after Hurricane Beryl were incorporated in your service restoration workflow and processes.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-49 Please describe your coordination efforts with local, state, and federal agencies, as well as any other stakeholders regarding service restoration before, during, and after Hurricane Beryl. Please provide details of any formal agreements or understandings with these parties.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-50 Excluding the need to clear significant volumes of vegetation, please identify and described any major challenges you experienced during the process of restoring service to your customers before, during, and after Hurricane Beryl and any solutions implemented to address those challenges.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

<u>STAFF 1-51</u> Please describe any lessons learned about restoring service to customers during Hurricane Beryl and how what you learned will inform restoration efforts in the future.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-52 Does your utility employ the National Incident Management System? If yes, please provide the date on which your utility starting using NIMS as its framework for managing emergency event response.

RESPONSE:

Yes. December 20, 2018.

SPONSOR:

STAFF 1-53 Are your emergency response personnel trained in Incident Command System processes? If not, please describe any training your emergency event management personnel have received and how they interact with local and state officials and other utilities.

RESPONSE:

Yes, GVEC has employees trained in Incident Command System as of December 20, 2018.

SPONSOR:

Distribution Infrastructure

STAFF 1-54 Please explain your process for evaluating and replacing distribution poles. Please include an explanation for the following in your response:

- a. How frequently this evaluation is conducted;
- b. What criteria you utilize for this evaluation; and
- c. When you decide to replace the distribution pole.

RESPONSE:

GVEC is driving the inspection process to a 10-year evaluation cycle with plans to replace any failed poles the following year unless they are deemed as a priority reject. GVEC addresses those poles immediately. GVEC utilizes contract labor for these inspections and they use resistograph equipment to drill and inspect all poles. In addition to the resistograph, they also perform an above ground visual inspection and note any items in need of repair.

SPONSOR:

STAFF 1-55 Please provide your minimum required right-of-way (ROW) width for both 3-phase and single-phase distribution lines.

RESPONSE:

15 feet on either side of center phase per easement.

SPONSOR:

- **STAFF 1-56** Identify all feeders on your distribution system affected by Hurricane Beryl or the May 2024 Derecho and provide the following for each identified feeder in MS Excel format:
 - a. The quantity and percentage of each installed pole type (e.g., wood, composite, steel, concrete, other) on the feeder before Hurricane Beryl;
 - b. The quantity and percentage of pole failures, by pole type, due to Hurricane Beryl;
 - c. Identify the primary cause of failure for each pole type on the feeder (e.g., trees, branches, wind, or other);
 - d. Identify the primary point of failure of the poles (e.g., crossarm failure, pole leaning, pole break, or other);
 - e. NESC construction strength and overload factors the feeder is currently built to;
 - f. Identify which feeders are in your plans to rebuild to a higher wind loading standard; and
 - g. Provide an estimate for when identified rebuilds will commence.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

- **STAFF 1-57** If your distribution system includes feeders with poles taller than 60-feet above ground level, please provide the following:
 - a. Identify each feeder that has any number of poles meeting this criteria;
 - b. Explain the damage experienced on these lines due to either the May 2024 Derecho or Hurricane Beryl; and
 - c. Explain the design criteria for these types of lines.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-58 Please explain your standard for distribution pole embedment. In your response, please explain if this standard has changed in the last 10 years.

RESPONSE:

15% of the pole goes into the ground. This standard has not changed in the last 10 years.

SPONSOR:

STAFF 1-59 Please provide the standard distribution pole size and class for both single and three phase lines on your system within the Impacted Area.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-60 Please explain the NESC construction strength and overload factors your distribution lines were built to in the past.

RESPONSE:

Distribution line construction in the past was based on REA/RUS criteria and guidelines issued by the USDA. REA based their calculations on conditions, cases, and overload factors from the NESC.

SPONSOR:

<u>STAFF 1-61</u> Please explain any new NESC construction strength and overload factors you adopted for distribution lines in the last two years to improve system resiliency.

RESPONSE:

No changes in the last 2 years.

SPONSOR:

- **STAFF 1-62** Please provide the following information regarding distribution feeders in the Impacted Area that did not lose power during Hurricane Beryl and the May 2024 Derecho:
 - a. Provide the designed criteria for these lines;
 - b. The type of poles installed;
 - c. The ROW widths;
 - d. Explain if these lines are designed to the latest NESC construction strength and overload factors; and
 - e. Explain if any distribution line experienced damage but remained standing.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-63 Please provide the number of distribution poles that were in service before the May 2024 Derecho. In your response, please provide quantities by pole type and NESC wind loading criteria of the pole.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho.

SPONSOR:

STAFF 1-64 Please provide the total number of distribution poles that failed due to the May 2024 Derecho. In your response, please provide separate quantities for each pole type and NESC wind loading criteria for the poles that failed, and separately identify the number of pole failures caused by either high wind or structural loading from vegetation or debris.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho.

SPONSOR:

STAFF 1-65 Please provide the total number of distribution poles that failed due to Hurricane Beryl. In your response, please provide separate quantities for each pole type and NESC wind loading criteria for the poles that failed, and separately identify the number of pole failures caused by either high wind or structural loading from vegetation or debris.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-66 For each distribution pole that failed due to the May 2024 Derecho or Hurricane Beryl, please provide the date of the last inspection and explain the planned frequency of those inspections. Additionally, please provide the most recent inspection report for each pole that failed.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-67 Should the PUCT require utilities to construct and maintain distribution feeder equipment located in a hurricane prone area to a certain NESC standard? If so, which ones? If no, why not?

RESPONSE:

GVEC follows all applicable NESC standards for its service territory.

SPONSOR:

Transmission Infrastructure

- **STAFF 1-68** Please explain your process for evaluating the hardening of transmission lines. If you file an annual storm hardening report under 16 TAC § 25.95, do not merely recite information provided in those filings. In your response, please include an explanation for the following:
 - a. How frequently this evaluation is conducted?
 - b. What criteria is utilized for this evaluation?
 - c. When do you decide to harden transmission lines?

RESPONSE:

a. GVEC does not have an after-constructed transmission line hardening program. GVEC's transmission lines are conservatively designed to meet NESC requirements, both District and Extreme Wind and Ice conditions, during the design phase.

b. See 68a. above.

c. Not applicable. However, when an existing wood pole transmission line is designated to be replaced, GVEC uses concrete and steel structures together with the conservative design practice as mentioned in 68a. above.

SPONSOR:

STAFF 1-69 Please provide the number of transmission structures that were in service before the May 2024 Derecho In your response, please provide quantities by structure type and NESC wind loading criteria of the structure.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho.

SPONSOR:

STAFF 1-70 Please provide the total number of transmission structures that failed due to the May 2024 Derecho. In your response, please provide separate quantities for each structure type and NESC wind loading criteria of the structure, and separately identify the number of structure failures caused by either high wind or structural loading from vegetation or debris.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho.

SPONSOR:

STAFF 1-71 Please provide the total number of transmission structures that failed due to Hurricane Beryl. In your response, please provide separate quantities for each structure type and NESC wind loading criteria of the structure, and separately identify the number of structure failures caused by either high wind or structural loading from vegetation or debris.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-72 For each transmission structure that failed due to the May 2024 Derecho or Hurricane Beryl, please provide the date of the last inspection and explain the planned frequency of those inspections. Additionally, please provide the most recent inspection report for each structure that failed.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

Vegetation Management

<u>STAFF 1-73</u> Provide the following information concerning your vegetation management staff:

- a. Provide the current size of your vegetation management staff. Your response should include a separate figure for full-time staff and independent contractors.
- b. Provide the average size of your vegetation management staff over the last 5 years. Your response should include a separate figure for full-time staff and independent contractors.
- c. Please explain how you determined the appropriate level of full-time vegetation management staff for each of the last 5 years.
- d. Provide the cost difference per circuit-mile between using contractors versus in-house vegetation management crews.
- e. Whether you retain an arborist as part of your permanent vegetation management staff or have an arborist consult with your vegetation management crews.

RESPONSE:

- a) 8 FTE, 11 contract crews
- b) 9 FTE, 14 contract crews
- c) GVEC determined the full-time staff required through an analysis of circuit miles to be inspected, maintenance service order requests from the membership and annual maintenance needs at its facilities.
- d) GVEC does not use internal crews for this process and have not had internal resources for many years due to the cost differential of internal employees being significantly higher in cost than contractor labor.
- e) GVEC has a full time arborist on staff.

SPONSOR:

STAFF 1-74 Please describe the minimum clearance standard for vegetation along transmission and distribution power lines at various voltage levels and how these clearances were derived based on your service territory.

RESPONSE:

For distribution, GVEC requires 30 feet of horizontal clearance within its easement.

For transmission, GVEC requires 80 feet of horizontal clearance for both 69kv and 138kv voltage. Additionally, if GVEC notices any potentially damaging trees outside of the easement it coordinates with the landowners for removal.

SPONSOR:

STAFF 1-75 Does your company incorporate any inspection of high customer count circuit segments to proactively identify problematic vegetation for circuits that may be outside their normal cycle period?

RESPONSE:

GVEC inspects circuits annually that tend to have quick-growth vegetation in densely populated areas. Additionally, GVEC inspects circuits with critical accounts outside of their normal cycle period.

SPONSOR:

<u>STAFF 1-76</u> Please provide inspection logs and field reports from workers who performed VM services in the Impacted Area for the past five years.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-77 Does your company conduct proactive vegetation management on feeders located in hurricane prone areas? If so, how far in advance of hurricane season do you send out vegetation management crews?

RESPONSE:

GVEC inspects all transmission lines for vegetation management annually. Distribution is on a rotation.

SPONSOR:

- **STAFF 1-78** Please provide a list of the circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl, and provide the following information pertaining to the circuits identified:
 - a. The name of the circuit(s);
 - b. The date, time, and duration of the outage;
 - c. The voltage of the circuit(s);
 - d. A description of the cause of the outage; and
 - e. The NERC category (Grow-In, Fall-In, Blow-In) associated with the outage.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-79 Please provide aerial maps of circuits and their easements that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl. Overlay the map with the circuits that received vegetation management treatment for the past 5 years, using a distinct color code for each year. Provide any additional information or details to show clarity.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

<u>STAFF 1-80</u> For the May 2024 Derecho and Hurricane Beryl, please provide the percentage of forced interruptions that were related to vegetation issues.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-81 What steps are being taken to address vegetation management and infrastructure issues that contributed to outages or were identified during restoration after the May 2024 Derecho and Hurricane Beryl?

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-82 When did you last substantively review, augment, or modify your vegetation management plan before July 8, 2024?

RESPONSE:

October 19, 2023

SPONSOR:

STAFF 1-83 What percentage of vegetation-related outages were caused by trees or branches outside of the easement or right of way? In responding to this question, please provide both an overall percentage and a breakdown for each county within your service territory that was affected by the May 2024 Derecho or within the Impacted Area for Hurricane Beryl.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

<u>STAFF 1-84</u> Describe your programs or initiatives that are designed to work with property owners to address potentially hazardous vegetation management issues that are outside of the utility easement or right of way.

RESPONSE:

GVEC will clear vegetation (with landowner permission) that is outside the easement or right of way and that poses a risk to its facilities. GVEC will work with the property owner as these instances are reported and if GVEC notices them during the cycle inspection.

SPONSOR:

STAFF 1-85 Identify the number of staff that participate in any program or initiative designed to address vegetation management hazards outside of the utility easement or right of way.

RESPONSE:

See responses to STAFF 1-73 and 1-84.

SPONSOR:

Staffing and Mutual Assistance

STAFF 1-86 Please state whether you participated in or were a member of any mutual assistance programs on or before July 8, 2024. If yes:

- a. Please identify all mutual assistance programs you participated in or were a member of on that date;
- b. Please provide copies of any agreements entered as part of your membership or participation in those mutual assistance programs; and
- c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.

RESPONSE:

- a. Texas Electric Cooperatives (TEC) Mutual Assistance Program
- b. Attached (Confidential)
- c. Attached (Confidential)

SPONSOR:

STAFF 1-87 Please describe, prior to, during, or in the aftermath of Hurricane Beryl how you integrated mutual assistance crews into your existing emergency preparedness and response processes, any coordination challenges you faced in doing so, and how you addressed any such challenges prior to, during, or in the aftermath of Hurricane Beryl.

RESPONSE:

GVEC's EOP was activated to Advisory Level, staff and contractors were notified to be on standby.

SPONSOR:

STAFF 1-88 Please describe the command structure and communication protocols used to manage and direct resources from mutual assistance program(s) you received assistance from prior to, during, and in the aftermath of Hurricane Beryl.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-89 Please describe the process and timeline for requesting or activating assistance as part of your membership or participation in any mutual assistance program(s) prior to, during, or in the aftermath of Hurricane Beryl.

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

STAFF 1-90 Once you learned of the Hurricane Beryl's potential to affect your ability to provide service to your customers, what specific actions were taken to begin coordinating with and staging mutual assistance resources to respond to service issues resulting from the hurricane?

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR:

- **STAFF 1-91** Provide the following information concerning mutual assistance received in response to either the May 2024 Derecho or Hurricane Beryl:
 - a. Identify all mutual assistance programs from which you requested assistance;
 - b. Describe the specific assistance, including but not limited to the number of damage assessors, vegetation management crews, linesmen, generators, and materials, requested from the mutual assistance program(s); and
 - c. Provide all documentation of requests made to mutual assistance programs and their responses to your requests.
 - d. If it is not evident from the documentation provided in response to Staff 1-91(c), please provide the date the request was made, the date the specific assistance requested began arriving in the Impacted Area, and the date by when the specific assistance requested was fully received.

RESPONSE:

GVEC was not impacted by the May 2024 Derecho or Hurricane Beryl.

SPONSOR:

STAFF 1-92 When you receive responses to requests for assistance from other mutual assistance program participants that confirm their ability to provide the requested assistance, are you able to accept or decline resources being offered as needed, or must you accept all assistance provided in response to a request?

RESPONSE:

Rendering of aid is entirely at the discretion of the Aiding signatory, as spelled out in our Mutual Aid Agreement (line item 2 and attached to this filing in response to STAFF 1-86).

SPONSOR:

STAFF 1-93 What considerations did you give to reimbursement of costs and expenses incurred by participants of mutual assistance programs when making requests for assistance during the events of Hurricane Beryl?

RESPONSE:

GVEC was not impacted by Hurricane Beryl.

SPONSOR: