



## **Filing Receipt**

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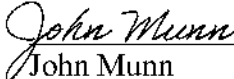
**VISTRA'S RESPONSES TO  
DIVISION OF COMPLIANCE AND ENFORCEMENT'S REQUESTS FOR  
INFORMATION REGARDING EMERGENCY PREPAREDNESS AND RESPOSNE BY  
UTILITIES IN HOUSTON AND SURROUNDING COMMUNITIES**

Vistra Corp. is the ultimate parent company of retail electric providers (“REPs”) Ambit Texas, LLC (“Ambit”); TriEagle Energy LP (“TriEagle”); TXU Energy Retail Company LLC (“TXUE”) and Value Based Brands LLC (“VBB”) and for simplicity these RFI responses will refer to them collectively as “Vistra Retail”. Vistra Retail submits these Responses to the Public Utility Commission of Texas Division of Compliance and Enforcement (“DICE”) Requests for Information (“RFIs”) regarding emergency preparedness and response by utilities in Houston and surrounding communities. These written responses are due on or before August 30, 2024. Therefore, these responses are timely filed.

**WRITTEN RESPONSES**

Attached hereto and incorporated herein by reference are Vistra Retail’s written responses to the aforementioned RFIs. Such responses are made without waiving Vistra Retail’s right to contest the admissibility of any such matters.

Respectfully Submitted,

  
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John Munn  
Managing Counsel, Retail Operations  
Vistra Corp.

## **INTRODUCTION**

Vistra Corp. is the ultimate parent company of retail electric providers (“REPs”) Ambit Texas, LLC (“Ambit”); TriEagle Energy LP (“TriEagle”); TXU Energy Retail Company LLC (“TXUE”) and Value Based Brands LLC (“VBB”) and for simplicity these RFI responses will refer to them collectively as “Vistra Retail”.

### **REQUEST REP 1-1**

Please detail the extent and duration of outages experienced by your customers during and in the aftermath of Hurricane Beryl. If known, please include the total number of customers impacted, minimum and maximum hours of service interruptions, average hours of service interruptions, and average time to service restoration.

### **RESPONSE**

Vistra Retail is aware that thousands of its customers in Houston and the surrounding areas experienced outages in the aftermath of Hurricane Beryl. Vistra Retail is aware that these outages started on July 8, 2024, with restoration efforts largely complete by July 19, 2024. However, outages for some customers extended beyond that time as repairs were required before they could safely receive power. Vistra Retail believes that the impacted Transmission and Distribution Utilities (“TDUs”) should have this data but is not aware of an automated systematic method for a REP to extract this data without material assumptions that would likely render the output less than 100% accurate. Vistra Retail provides a few anecdotal customer interactions below.

#### ***Customer Interaction 1***

*“I am a TXU customer in Houston, TX (Spring), who was without power for over a week due to Beryl. Recognizing that I was behind on payments, I was trying to work with TXU to pay my balance in full on Tuesday, July 30th, when I get paid. I was already behind but had to empty my bank account dealing with damages from the Hurricane.”*

**Vistra Retail’s Customer Support:** The TXU Energy team assisted this customer by ensuring there would be no adverse action taken on the account, allowing the customer the requested time to make the payment. The customer expressed his gratitude and appreciation for the support and assistance provided.

***Customer Interaction 2***

*"The insurance and FEMA have not arrived yet. I have damage to my home that is making usage go up and will have home repair costs. I need more time / need a lower initial payment for an arrangement."*

**Vistra Retail's Customer Support:** TXU Energy established a deferred payment plan ("DPP") for the customer, with a lower initial down payment than would normally be required. The customer indicated appreciation for the assistance and support provided by TXU Energy. *(This is a scenario that has occurred frequently.)*

**REQUEST REP 1-2**

Please detail and provide any supporting data on the extent and duration of outages experienced by your customers during and in the aftermath of the May 2024 Derecho event. If known, please include the total number of customers impacted, minimum and maximum hours of service interruptions, average hours of service interruptions, and average time to service restoration.

**RESPONSE**

Vistra Retail is aware that thousands of its customers in Houston and the surrounding areas experienced outages in the aftermath of the May 2024 Derecho event. Vistra Retail is aware that these outages started on May 16, 2024, with restoration efforts largely complete by May 23, 2024. However, outages for some customers extended beyond this date as repairs were required before they could safely receive power. Vistra Retail believes that CenterPoint ("CNP") should have this data but is not aware of an automated systematic method for a REP to extract this data without material assumptions that would likely render the output less than 100% accurate.

**REQUEST REP 1-3**

Which geographic areas were most affected by any outages experienced by your customers due to the May 2024 Derecho and Hurricane Beryl, and what factors do you think contributed to these areas being particularly vulnerable? Please provide neighborhood names, city names, zip codes, and county names, where known.

**RESPONSE**

Generally, our customers in the areas nearest to the Texas Gulf Coast and the Greater Houston area were most affected by Hurricane Beryl. For the May 2024 Derecho storm, our customers in the Greater Houston area were most affected.

### **REQUEST REP 1-4**

Please describe how you communicated with your customers before, during, and after Hurricane Beryl regarding service disruptions and restoration efforts. If you have any representative examples of these communications, please attach them to your response.

### **RESPONSE**

- Vistra Retail used online Banners and Alerts on our REPs' websites, mobile apps, and within the online "MyAccount" section to raise consumer awareness of how/where to report outages.
- Vistra Retail published social media posts to inform Texans about severe weather resources, and how to report outages.
- Vistra Retail received over 160 social media posts and comments related to Hurricane Beryl and most comments involved customers communicating frustration with extended outages.
- TXU Energy's customer care system alerted agents to potentially impacted customer accounts, providing storm messaging and communicating flexibility in payment arrangement assistance for storm-affected customers. Other Vistra Retail brands added Hurricane Beryl alerts to potentially impacted customer accounts to improve agent ability to identify and assist Beryl impacted customers.
- Vistra Retail alerted its call centers, providing storm messaging and communicating flexibility in payment extensions via payment arrangements and/or deferred payment plans.
- Press Release: Vistra and its family of retail electricity brands pledged \$1 Million to aid customers and communities impacted by Hurricane Beryl. See response to RFI 1-7 for more information, including the press release.
- Vistra Retail announced additional payment flexibility for customers of all brands to assist customers affected by Hurricane Beryl including:
  - Waiving late fees
  - Extending payment due dates with no down payment required
  - Reducing down payments and deferring the balances over five equal installments

- TXU Energy included the bill message below to support Vistra Retail's announced payment flexibility for Beryl-affected customers



**We're here for you**

Our thoughts go out to everyone affected by the devastation caused by Hurricane Beryl. We're here to help in any way that we can, including additional payment flexibility. You can reach us 24/7 at 800-242-9113.

- Vistra implemented TXU Energy MyAccount messaging and MyAmbit Account messaging indicating the potential for preliminary estimated usage to be present on customer invoices during an outage period that will be updated when actual usage is provided from the TDUs.
- To prevent customer confusion resulting from preliminary estimated usage data from the TDU, Vistra suspended TXU Energy Weekly Snapshot emails and Ambit Weekly Usage emails to customers in the Beryl-impacted areas to allow time for TDUs to replace estimated usage data with actual usage data.
- Vistra suspended TXU Energy Budget/Usage alerts while TDU meter interrogation/gap retrieval processes continued in order to minimize the potential of communicating errant estimated usage when customers may have been without power.

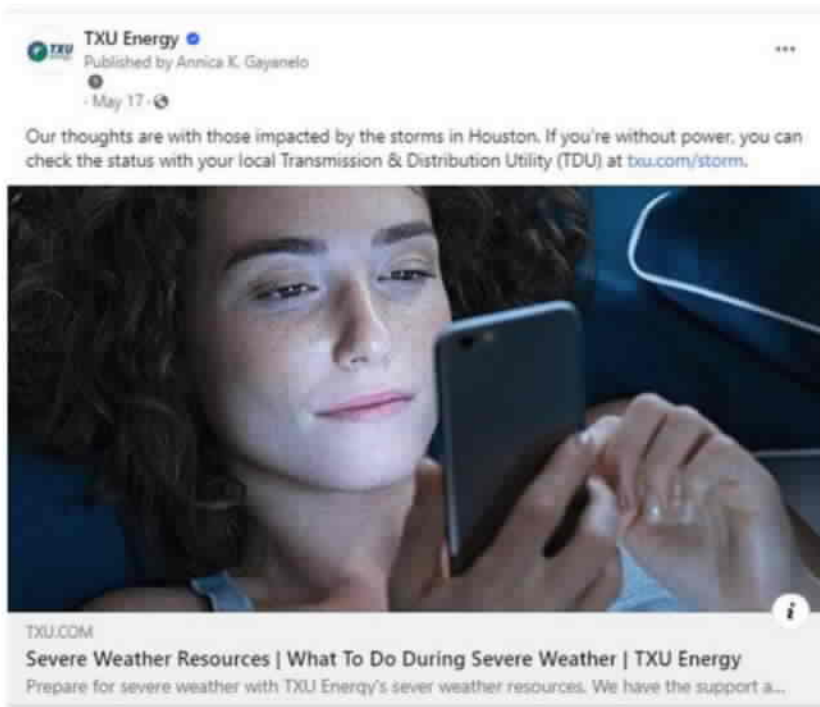


## **REQUEST REP 1-5**

Please describe how you communicated with your customers before, during, and after the May 2024 Derecho event regarding service disruptions and restoration efforts. If you have any representative examples of these communications, please attach them to your response.

## **RESPONSE**

- Vistra Retail published social media posts to inform Texans about severe weather resources, and how to report outages. See example below.



- Vistra Retail used online Banners and Alerts on our REPs' websites, mobile apps, and within the online "MyAccount" section to raise consumer awareness of how/where to report outages.
- TXU Energy's customer care system alerted agents to potentially impacted customer accounts, providing storm messaging and communicating flexibility in payment arrangement assistance for storm affected customers.
- Vistra Retail alerted its call centers, providing storm messaging and communicating flexibility in payment extensions via payment arrangements and/or deferred payment plans.
- Vistra Retail received many social media posts and comments related to the Derecho storm and most comments involved customers communicating frustration with extended outages.

**REQUEST REP 1-6**

Please indicate the percentage of your customers that had “opted-in” to providing their contact information to the customer’s corresponding TDU as of July 8, 2024.

**RESPONSE**

A customer is not required to “opt-in” for Vistra Retail to provide the customer’s phone number(s) to the TDU. The Commission’s rules and the TDUs’ tariffs already allow for the communication of customer contact information between REPs and TDUs to effectuate a customer’s move-in, transfer, or switch (or other required market transaction), in addition to specific provisions in the TDUs’ tariffs. See 16 TAC § 25.472(b)(1)(F), (I), and (J), as well as Section 4.3.7 of the pro-forma TDU tariff found in 16 TAC § 25.214(d).

Vistra Retail is currently providing to the TDUs (including CNP) a phone number for 100% of retail customers who provide a phone number to Vistra Retail at the time the customer enrolls and when the customer changes/adds phone number data. Vistra Retail is providing the customer phone number at the time of customer enrollment via the standard market transactions for Move-Ins (814\_16) and Switches (814\_01). Phone number is an optional field for these market transactions, and Vistra Retail voluntarily provides this data to the TDU at the time of enrollment to support timely activation of each customer’s service. For example, TXU Energy has been providing a customer phone number to the TDU for Move-Ins and Switches for at least 12 years. Additionally, when a current customer changes an existing phone number or adds a new one to their retail electric account, Vistra’s REPs are notifying the TDU of the new phone number data by sending an 814\_PC market transaction. Accordingly, TDUs already have material customer contact information for Vistra Retail’s customers.

Vistra recommends that going forward the customer phone numbers continue to be provided to the TDU via market transactions consistent with the process described above. 814\_PC transactions are only to be used for *changes* to existing customer contact information and cannot be submitted until after a Switch or Move-In market transaction has established a REP relationship with a customer’s ESI ID. Vistra Retail recommends that the initial submission of a customer phone number to the TDU should continue to be made through the existing Move-In and Switch market transactions.

**REQUEST REP 1-7**

Please describe your coordination efforts with local authorities, TDUs, and other relevant entities during and in the aftermath of Hurricane Beryl.

**RESPONSE**

Vistra Retail worked collaboratively with market participants and other stakeholders during and after Hurricane Beryl. In response to the devastating impacts of Hurricane Beryl, Vistra and its family of retail brands were proud to be the first competitive market participant to issue a press release (reproduced below) announcing our pledge of \$1 million to help those impacted with critical needs, announcing our community recovery efforts, and announcing our first-to-market bill-payment assistance and flexibility in the Houston, Upper Gulf Coast, and Corpus Christi regions. Vistra's \$1 million donation was divided among our charity and social service agency partners, who work directly with impacted Texans to provide assistance with supplies and food, and our Energy Aid program, which supports TXU Energy, Ambit Energy, TriEagle Energy, 4Change Energy, Express Energy and Veteran Energy, to assist with electric bills.

Vistra Retail advocated for and encouraged CNP, AEP, and TNMP to provide regular retail market updates/notices regarding electric restoration status and customer messaging. With CNP in particular, Vistra Retail actively encouraged CNP to hold daily retail market conference calls. Upon substantial electric restoration, Vistra Retail requested CNP to continue the market calls with a focus on meter data restoration. Vistra Retail's team participated in daily CNP market calls, used information provided and responses to questions to work with Vistra internal teams to plan and execute Vistra Retail's storm response and customer assistance measures.

Vistra had a representative(s) following the State Operations Center ("SOC") Situation Briefings and Texas Energy Reliability Council ("TERC") Industry Coordination calls that the Texas Division of Emergency Management ("TDEM") held before, during and after Beryl's landfall. The Vistra representatives then disseminated that information to internal teams.

During Hurricane Beryl, Vistra's Government Affairs team had contact with various legislative offices regarding how Vistra could most effectively help their constituents in need.



Project No. 56793  
Issues Related to the  
Disaster Resulting from  
Hurricane Beryl

## NEWS RELEASE

FOR IMMEDIATE PUBLICATION

# Vistra Pledges \$1 Million to Aid Customers and Communities Impacted by Hurricane Beryl

## Additional Energy Aid<sup>SM</sup> Funds Available to Texas Communities

IRVING, Texas — July 15, 2024—With the initial impacts of Hurricane Beryl stretching into a second week, Texas-based Vistra (NYSE: VST) is announcing several ways it and its family of retail electricity brands are helping Texans with critical needs, recovery efforts, and bill-payment assistance and flexibility. Vistra's retail brands include TXU Energy, Ambit Energy, TriEagle Energy, 4Change Energy, Veteran Energy, and Express Energy.

"This devastating storm has significantly affected the lives of millions, and we are committed to helping those communities in distress. The impacts go far beyond the storm itself as many Texans lost power during sweltering summer heat and have lost vital resources such as food and medicine," said Scott Hudson, president of Vistra Retail. "Our hope is that this contribution will help to provide relief and comfort to those still dealing with Beryl's aftermath."

Vistra's \$1 million donation will be divided between its charity and social services partners, who will work directly with impacted Texans to provide assistance with supplies and food, and its own Energy Aid program to assist with electric bills.

"When our customers are dealing with the hardship of rebuilding, we don't want them worrying about whether to pay their electric bill or buy groceries. By utilizing our Energy Aid funds, they can free up that money to use on other necessities," Hudson continued.

"With this gift, Vistra is providing direct assistance to help neighbors throughout the greater Houston region recover from Hurricane Beryl," said Claudia Aguirre, president and CEO of BakerRipley. "The loss of food, income, and the additional expenses incurred by families all over the region is significant. We are grateful for Vistra and its family of retail brands for the ongoing partnership, especially during times like this."

### To access assistance:

Accessing assistance is simple.

**Bill-payment assistance:** Over the last 40 years, the company's Energy Aid program has provided more than \$130 million in bill-payment assistance, helping around 20,000 families a year keep their homes powered and safe. These funds are donated by employees, customers, and the company and are distributed through social service partner agencies.

## Vistra Press Release

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With today's announcement, Vistra is providing an additional \$400,000 through Energy Aid to assist customers in areas impacted by Hurricane Beryl who need help paying their electric bills. These funds are being allocated to existing Energy Aid partners serving Houston and upper Texas Gulf Coast areas.

For information on which social service agency provides assistance in their area, customers can call 2-1-1 and ask for "bill payment assistance."

**Payment flexibility:** Additionally, during this time of extreme need, Vistra's Texas retail brands are providing payment flexibility to customers affected by Hurricane Beryl by:

- Waiving late fees.
- Extending payment due dates with no down payment required.
- Reducing down payments and deferring the balances over five equal installments.

This assistance will be available through at least Aug. 30 to customers of Vistra's Texas retail brands: TXU Energy, Ambit Energy, TriEagle Energy, 4Change Energy, Veteran Energy, and Express Energy. Customers can call the customer service number on their electric bill to take advantage of this payment flexibility assistance.

**All other critical needs like food and necessities:** Texans can call 2-1-1 to be connected to social service agencies partnering with Vistra in their area, including BakerRipley, Catholic Charities, and Northwest Assistance Ministries.

##

**Media**  
Media.Relations@vistracorp.com  
214-875-8004

### About Vistra

Vistra (NYSE: VST) is a leading Fortune 500 integrated retail electricity and power generation company that provides essential resources to customers, businesses, and communities from California to Maine. Based in Irving, Texas, Vistra is a leader in the energy transformation with an unyielding focus on reliability, affordability, and sustainability. The company safely operates a reliable, efficient, power generation fleet of natural gas, nuclear, coal, solar, and battery energy storage facilities while taking an innovative, customer-centric approach to its retail business. Learn more at [vistracorp.com](https://www.vistracorp.com).

**REQUEST REP 1-8**

Please describe your coordination efforts with local authorities, TDUs, and other relevant entities during and in the aftermath of the May 2024 Derecho event.

**RESPONSE**

Vistra worked collaboratively with market participants and other stakeholders during and after the May 2024 Derecho event. Vistra Retail advocated for and encouraged CNP to provide regular retail market updates/notices regarding electric restoration status and customer messaging. Vistra Retail encouraged CNP to hold daily retail market conference calls, and upon substantial electric restoration, Vistra Retail requested CNP to continue the market calls with a focus on meter data restoration. Vistra Retail participated in daily CNP market calls, used information provided and responses to questions to work with Vistra internal teams to plan and execute Vistra Retail's storm response and customer assistance measures.

Vistra had a representative(s) following the SOC Situation Briefings and TERC Industry Coordination calls that TDEM held related to the Derecho event. The Vistra representatives then disseminated that information to internal teams.

## **REQUEST REP 1-9**

Please describe feedback you have received from your customers regarding your response to Hurricane Beryl or the May 2024 Derecho event and efforts you are making or will make to address any concerns raised.

## **RESPONSE**

As you can imagine, impactful events like Beryl and the Derecho drive social media activity. Vistra Retail received over 160 social media posts and comments related to Hurricane Beryl and most comments involved customers communicating frustration with extended outages. Similarly, Vistra Retail received many social media posts and comments related to the Derecho storm and most comments also involved customers communicating frustration with extended outages. Vistra Retail's call centers generally heard customer frustration about outage times and estimated bills (caused by lack of actual TDU consumption data). Vistra Retail will assess actions and feedback for both events and update our protocols for lessons learned to continue to improve Vistra Retail's response to future events.

### **Derecho**

For the May 2024 Derecho event, Vistra Retail conducted a round of outreach to our social agencies in the impacted areas to understand customer needs. Vistra Retail's customer advocacy team then communicated that information internally to ensure appropriate support was provided to the communities and customers impacted.

### **Beryl**

Immediately after Hurricane Beryl made landfall, Vistra Retail's Customer Advocacy Team reached out to social service agency partners in South Texas to understand the most effective ways Vistra Retail could support the communities and customers impacted (e.g., food, bill payment assistance). As a result, Vistra Retail allocated dollars to support those communities with donations and additional bill payment assistance (Energy Aid) funding. Additionally, Vistra Retail representatives contacted 2-1-1 Texas to understand the needs of the customers and provided them with information on the additional support available from Vistra (e.g., provided them with a list of the agencies that received the additional funding so they could direct customers accordingly). Support was also provided to an agency (M.I. Lewis) whose facility received significant damage from Beryl.

At a Beat-the-Heat event in Houston after the hurricane, members of Vistra Retail attended the event in person and partnered with BakerRipley and the Houston Food Bank to provide Hurricane Food Recovery Boxes to impacted families.

Below are some of the email responses Vistra Retail has received from some of the social agencies that received Hurricane Beryl donations from Vistra:

- *Thank you so much for your generous donation to disaster food! Many in our community were without power for over a week and are seeking assistance to replenish their food. Your donation will go a long way in supporting our local community during this challenging time following Hurricane Beryl.* – HAAM Social Services
- *This is coming at the best time as our pantry has been inundated with clients that were impacted and lost groceries not once but twice.* – Wesley Community Center
- *This is incredible and will be greatly appreciated by the neighbors in our community. What a wonderful blessing you and the team at TXU Energy are! We are appreciative and grateful for your partnership.* – Community Assistance Center
- *Words cannot describe how thankful we are to the endless support that TXU Energy has provided to M.I. Lewis over the years and especially in time of need. I cannot thank you and everyone at TXU Energy for all of the support! I am proud of our partnership and together we are serving so many people in need. Thank you just does not seem enough!* – M. I. Lewis
- *We're incredibly grateful for your generous gift to BakerRipley Neighbors in the wake of Hurricane Beryl. Your support makes a real difference for our community during these challenging times. With this gift, Vistra is providing direct assistance to help neighbors throughout the greater Houston region recover from Hurricane Beryl. The loss of food, income, and the additional expenses incurred by families all over the region is significant. We are grateful for Vistra Corp. and its family of retail brands for the ongoing partnership, especially during times like this.* – BakerRipley
- *This Energy Aid funding will help our clients through the recovery process. It will provide them some flexibility in managing all the household challenges and expenses.* - BakerRipley
- *The additional Energy Aid funds will be so helpful to our clients. It is one less thing our families need to worry about during this time of recovery and children going back to school.*  
– St. Vincent House

From our customers specifically, the feedback has been of overwhelming gratitude for Vistra being there to help them with recovery. At the BakerRipley event where Vistra Retail team members handed out food boxes, the crowd began chanting “*We love TXU! Thank You TXU.*” Vistra works hand-in-hand with our social service agency partners on a daily basis. This strong foundation is pivotal in our ability to best assist impacted customers and communities during difficult times. Our coordination efforts, care, and speed led some of them to share their gratitude, some of which is captured above.



**REQUEST REP 1-10**

Please describe the key lessons learned following the May 2024 Derecho event and Hurricane Beryl.

**RESPONSE**

Vistra Retail incorporates the responses to the other RFIs.

**REQUEST REP 1-11**

Please describe any plans to improve or bolster your response to similar emergency events in the future.

**RESPONSE**

Vistra Retail is assessing actions for both the Derecho and Beryl and will incorporate lessons learned into our protocols to continue to refine Vistra Retail's response to future extreme events.

**REQUEST REP 1-12**

Please provide any additional information and describe any concerns that may be helpful to this investigation or may be relevant to the assessment and relief efforts in the aftermath of Hurricane Beryl and the May 2024 Derecho event.

**RESPONSE**

Vistra Retail incorporates the responses to the other RFIs.