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

OF TEXAS

NAVASOTA VALLEY ELECTRIC COOPERATIVE, INC'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO TARGETED ELECTRIC CO-OPS QUESTION NOS. STAFF 1-1 THROUGH 1-120

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

Navasota Valley Electric Cooperative, Inc. ("NVEC") 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. Steve Jones, General Manager stipulates that its responses may be treated by all parties as if they were filed under oath.

Dated: August 30, 2024

Respectfully Submitted,

Steve Jones General Manager Navasota Valley Electric Cooperative, Inc.

STAFF 1-1

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:

No hurricane or major storm drills have been conducted in 2024.

- a. N/A
- b. N/A
- c. N/A
- d. N/A
- e. N/A
- f, N/A
- g. N/A
- ĥ. N/A

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:

No

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

- a. NVEC utilizes information and member feedback from each storm to improve our processes.
- b. N/A

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:

Brazos Electric Power Cooperative, Inc. (Brazos)

We have weekly ring down drills with Brazos to ensure all comes are up. Additionally, there are two major event drills each year.

SPONSOR:

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

RESPONSE:

NOAA, NWS, TDEM, ERCOT, Texas Storm Chasers, Ventusky, TikTok, Windy, RadarScope, MyRadar Pro, Storm Chaser Adam Lucio, Storm Chaser Stephen Jones, 2024 Hurricane & Tropical Storm Updates, Jonathan Petramala Storyteller, Live Storm Chasers, multiple local and regional meteorologists via social media

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:

7 days or as soon as information is available.

SPONSOR:

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

RESPONSE:

9 days

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:

Yes

SPONSOR:

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

RESPONSE:

5 days

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:

We restore substations and feeders first to restore maximum number of members and critical load quickly, then work from the largest outages to smaller outages until all are restored as detailed in our EOP.

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:

Procedures for communicating with various entities and stakeholders are in NVEC's EOP that is filed with the PUCT. Designated personnel are the primary spokesperson during emergencies. NVEC provides outage updates to the OPUC, TDEM, ERCOT, and other local government agencies as requested. Members have multiple ways to receive outage updates: Outage Viewer, IVR, text messaging, navasotavalley.com.

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. When outage counts are beyond a certain threshold NVEC transitions into emergency operations for all employees.

EOP Page 2-11

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:

Mutual Aid and Contract crews are on standby as the storm passes through our system. After reasonable assessments of damage, we call in the necessary crews and equipment needed to restore power. NVEC prepares meals. Mutual Aid and Contract crews book their lodging.

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:

NVEC was already under emergency operations due to flooding when the May 2024 Derecho occurred. Contract crews and equipment were onsite.

NVEC did not initiate emergency operations for Hurricane Beryl

SPONSOR:

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

RESPONSE:

May 2024 Derecho:

The first outage came in on May 15, 2024, at 8:20:19AM. NVEC's last outage during this time was restored May 18, 2024, at 9:45:24PM.

May 15th-First outage started at 8:20:19AM. Last outage restored at 8:07:12PM this same day.

May 16th- First outage started at 12:25:40AM. Some outages that came in on the 16th continued overnight into the 17th, with the last being restored May 17, 2024, at 12:19:42PM.

The last outage that came in on May 17th was restored at 11:50:00PM

May 18th- First outage started at 6:49:24AM. All restored at 9:45:24PM.

Hurricane Beryl

First outage after landfall started July 8, 2024 at 6:18:28 AM four outages continued overnight; NVEC's last outage resulting from Hurricane Beryl was restored July 9th at 3:35:28PM.

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:

May 2024 Derecho (May 15-18th):

83 total outages. Total customers affected: 3725. Service Interruptions: Minimum: 8 minutes Maximum: 17 hours, 30 minutes Average: 3 hours, 24 minutes Service Restoration: Maximum: 17 hours, 30 minutes Average: 3 hours, 24 minutes

Hurricane Beryl (July 8th - 9th)

52 total outages. Total customers affected: 2681 Service Interruptions: Minimum: 4 minutes Maximum: 23 hours, 49 minutes Average: 4 hours, 8 minutes Service Restoration: Maximum: 23 hours, 49 minutes Average: 4 hours, 8 minutes

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:

- a. For the May 2024 Derecho the area that experienced the highest number of outages was Hilltop Lakes, Tx., in Leon County. The zip code is 77871.
- b. For Hurricane Beryl the area that experienced the highest number of outages was Hilltop Lakes, Tx., in Leon County. The zip code is 77871.
- c. The Hilltop Lakes area is densely populated compared to other areas in our coverage area and was heavily affected by flooding in early May.

SPONSOR:

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

RESPONSE:

Flooding from previous storms made the May 2024 Derecho restoration more challenging. Large areas in our service territory were saturated or under water which required special equipment to access these areas.

Hurricane Beryl did not create extensive damage for the NVEC service area.

SPONSOR:

<u>STAFF 1-19</u> 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:

SPONSOR:

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

RESPONSE:

No additional information to provide at this time.

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:

We have a Crisis Communication plan in place for major storms that outlines employees' roles during a major event. This includes notifying local government, community organizations and our customers/members.

(You may need to answer each subpart separately. Augmentation to staffing? What types of notification? See Brenham's response.)

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:

Communication with our members is provided in several ways. For communicating with the public, details regarding cause and ETOR for ongoing outages are added to messages associated with each outage. Members included in each outage are given the message when they inquire via phone or text message. Details for larger outages are also published on our social media and website.

May 2024 Derecho- On May 16th we shared a weather alert from the National Weather Service-Ft. Worth to our social media channel. We also provided outage updates via our social media channel, text messaging, and messaging when members inquire via phone. We included ways to report an outage and a link to our outage viewer. On May 17th we provided outage updates via social media, text messaging and phone.

Hurricane Beryl- On July 6th and July 8th we shared a weather alert regarding Hurricane Beryl from the National Weather Service- Ft. Worth to our social media channel. On July 8th we also shared outage updates with a link to our outage viewer on our social media channel. Updates were also provided via text messaging and phone.

SPONSOR:

<u>STAFF 1-23</u> 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:

The response on NVEC's social media channel was mostly positive.

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:

NVEC is continually working to improve coordination and communication with local agencies and stakeholders. These communications can vary depending on events and needs that arise.

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:

NVEC operations staff maintains regular communication with other electric, water, sewer, and telecommunications utilities. Additionally, NVEC relies on the emergency management teams in our service area to help with coordination and communication.

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:

- g. Eleven (11)
- h. Eleven (11) FTE
- i. N/A. NVEC does not have targeted wait time for calls.
- j. N/A. NVEC does not have targeted resolution time for calls.
- k. On the Job Training is provided by staff members. Additionally, there are regular briefings throughout the emergency to give our member service representatives relevant information for our members.
- 1. 405 calls

SPONSOR:

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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:

July 8, 2024- Peak call volume of 498 outage related calls

July 8, 2024- 498 outage related calls July 9, 2024- 13 outage related calls

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:

NVEC provides support to local, and state leaders as requested.

On July 6th and July 8th, we shared a weather alert regarding Hurricane Beryl from the National Weather Service- Ft. Worth to our social media channel. On July 8th we also shared outage updates with a link to our outage viewer on our social media channel. Updates were also provided via text messaging and phone. NVEC has a live outage map on its website for anyone to view.

Hurricane Beryl did not create extensive damage for the NVEC service area.

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:

Incoming calls are recorded and retained for 90 days.

SPONSOR:

<u>STAFF 1-30</u> 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:

Incoming calls are recorded and retained for 90 days.

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:

NVEC did not utilize any pre-recorded messages related to 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. 2012
- b. May 16, 2024
- c. Outage Viewer was functioning as intended.
- d. Outage Viewer is mobile-friendly.
- e. English
- f. Outage Viewer is circuit and meter specific.
- g. Outage Viewer is operated through an on-premise server.
- h. There is no limit to simultaneous users on Outage Viewer.

i. A redundant server is available with failover capacity. It was not necessary to utilize the redundant server during Hurricane Beryl.

j. Outage Viewer has not been stress or load tested except through actual events that were larger than the effects of the May 2024 Derecho and Hurricane Beryl on our system.

SPONSOR:

<u>STAFF 1-33</u> 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:

NVEC does not provide power to the greater Houston area.

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:

The Outage Viewer application does not track users accessing the software.

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:

NVEC has multiple ways to notify members of outages and estimated restoration times.

IVR

Texting

Website

Social Media

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:

The May 2024 Derecho event and Hurricane Beryl did not create extensive damage or outages for the NVEC service area. NVEC's outage tracker was online during these dates. We also used multiple means to notify members of outages and restoration times.

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:

Brazos County- 179 total meters. 179 smart meters = 100%

Falls County- 1208 total meters. 1203 smart meters= 99.6%

Freestone County- 2176 total meters. 2159 smart meters= 99.2%

Hill County- 355 total meters. 354 smart meters= 99.7%

Leon County- 3658 total meters. 3639 smart meters= 99.5%

Limestone County- 5279 total meters. 5251 smart meters= 99.5%

Madison County- 44 total meters. 44 smart meters= 100%

McLennan County- 1557 total meters. 1538 smart meters= 98.8%

Robertson County-6680 total meters. 6629 smart meters= 99.2%

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:

No local governments were contacted.

SPONSOR:

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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:

N/A

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:

N/A

SPONSOR:

<u>STAFF 1-41</u> 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:

N/A

SPONSOR:

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

RESPONSE:

N/A

SPONSOR:

<u>Electric Utilities – Customer Restoration Workflow</u>

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:

NVEC restoration procedures are contained in the EOP which has been filed with the PUCT.

EOP Page 2-11

SPONSOR:

<u>STAFF 1-44</u> 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:

NVEC restoration procedures are contained in the EOP which has been filed with the PUCT.

EOP Page 2-11

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:

None

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:

Initial damage assessments were performed on July 8th with 21 NVEC personnel divided among the affected counties as follows:

Falls: 2

Freestone: 4

Leon: 5

Limestone: 6

McLennan: 1

Robertson: 3

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:

July 8th:

Falls: 1.9%

Freestone: 4.1%

Leon: 15.3%

Limestone: 19.0%

Robertson: 2.8%

July 9th:

Falls: 0.1%

Freestone: 1.8%

Leon: 0.6%

Limestone: 0.1%

McClennan: 0.1%

Robertson: 0.0%

Brazos, Hill, and Madison County were not affected 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:

Calls are entered in NVEC's outage management system, making the information available to dispatchers and linemen.

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:

NVEC coordinates with local agencies to update them of ongoing restoration progress.

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:

NVEC did not incur any major challenges restoring service.

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:

NVEC will continue to improve our communications and technology to inform members of outage information.

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:

No

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:

No. Emergency event management personnel have not received training. Personnel interacts with local and state officials during outage and disaster events.

SPONSOR:

Distribution Infrastructure

<u>STAFF 1-54</u> 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:

- a. NVEC pole evaluation is conducted by a third-party contractor every 10 years.
- b. Inspection consists of visual, sound, and bore sample for each pole.
- c. Poles that fail inspection are replaced as needed.

SPONSOR:

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

RESPONSE:

NVEC easement is 10 feet in all directions of lines, poles, guys, anchors, and other facilities.

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:

- a. No information available
- b. 1 wood pole,
- c. Wind
- d. Pole break
- e. NESC Medium Construction Standards and USDA RUS standards
- f. None
- g. N/A

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:

- a. Franklin 2402, Farrar 2412, Farrar 2413, Butler 2401, Hilltop Lakes 1203, Hilltop Lakes 1201, Midway 2402, Groesbeck 1204, Prairie Hill 2403, Skipper 1216
- b. No damage on these feeders.
- c. NESC Medium Construction Standards and USDA RUS standards

SPONSOR:

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

RESPONSE:

Distribution pole embedment is installed according to RUS standards of 10% pole length plus two feet. These standards have not changed in the last 10 years.

SPONSOR:

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

RESPONSE:

- 30-6
- 35-5
- 35-3
- 40-5
- 40-3
- 45-3

SPONSOR:

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

RESPONSE:

NVEC distribution lines were built following the applicable NESC Light and Medium Standards in affect at the time of construction.

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:

NVEC has not adopted new construction strength and overload factors for its distribution lines in the last two 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:

NVEC feeders that did not lose power during the Hurricane Beryl and the May 2024 Derecho:

- a. Applicable NESC Standards in effect at the time of construction. NVEC also follows USDA Rural Utility Services (RUS) applicable construction standards.
- b. Wood and Steel
- c. ROW is 10'
- d. Yes. The lines are designed to NESC Medium Construction Standards which exceed the minimum design requirements.

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:

Wood Poles:	<u>Quantity</u>
35' and under	267,163
40' and 45'	21,480
50' and over	253
Steel Poles:	
60'	6
65'	16
35'	25
40'	623
45'	171
50'	4
TOTAL:	289,741.00

NVEC distribution lines were built following the applicable NESC Light and Medium Standards in affect at the time of construction.

SPONSOR:

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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:

NVEC had zero distribution poles fail due to the May 2024 Derecho

SPONSOR:

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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:

NVEC had one wood distribution pole fail due to Hurricane Beryl, which was caused by high wind.

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:

Pole 46-25-95-81x was last inspected in 2017.

NVEC has a planned frequency of 10 years for pole inspections.

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:

No opinion at this time.

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:

NVEC does not own transmission facilities or equipment.

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:

NVEC does not own transmission facilities or equipment.

SPONSOR:

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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:

NVEC does not own transmission facilities or equipment.

SPONSOR:

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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:

NVEC does not own transmission facilities or equipment.

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:

NVEC does not own transmission facilities or equipment.

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. 2 full-time employees. 6 full-time contract crews.
- b. 2 full-time employees. 3 full-time contract crews.
- c. Financial parameters.
- d. N/A
- e. No 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:

NVEC does not own or maintain transmission facilities or equipment.

NVEC maintains a 10' easement for all primary overhead distribution lines.

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:

Yes. Visual inspection, periodically.

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:

N/A

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:

NVEC is not located in a hurricane prone area.

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:

May 2024 Derecho:

- a. Groesbeck 1201-Ft. Parker:
- b. 5/16/2024, 11:23 AM. Interruption duration 131 minutes.
- c. 7.2 kV.
- d. Tree
- e. Fall-In.

Hurricane Beryl:

No circuits experienced a vegetation-related outage during Hurricane Beryl.

SPONSOR:

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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:

Vegetation outages:

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:

May 2024 Derecho: 18.1% of forced interruptions were related to vegetation issues.

Hurricane Beryl: 39.6% of forced interruptions were related to vegetation issues.

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:

NVEC is currently doing a system wide easement clearing of all vegetation. Completion will be approximately 4 years. NVEC is also actively inspecting poles and replacing reject poles.

SPONSOR:

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

RESPONSE:

April 2021 and April 2023

SPONSOR:

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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:

Derecho: 19%

Leon county was the only county with outages caused t\by trees outside the right of way. With 60%

Beryl: 5%

Leon county was the only county with outages caused t/by trees outside the right of way. With 12.5%

SPONSOR:

STAFF 1-84 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:

Members are encouraged to report these issues to NVEC for removal. Additionally, contractors remove these problems outside of the row while clearing the easement.

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:

NVEC contract crews remove the portion of dead or leaning trees that may impact NVEC facilities as they traverse the distribution lines they are clearing.

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. NVEC participates in mutual assistance programs through Texas Electric Cooperatives.
- b. Agreement attached.
- c. Members of Texas Electric Cooperative's are participants in the mutual assistance program.

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:

NVEC did not request mutual assistance crews for the Hurricane Beryl event.

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:

N/A

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:

NVEC did not request mutual assistance crews for the Hurricane Beryl event.

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:

NVEC did not request mutual assistance crews for the Hurricane Beryl event.

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:

NVEC did not request mutual assistance crews for the May 2024 Derecho or Hurricane Beryl events.

- a. N/A
- b. N/A
- $c, \quad N/A$
- d. N/A

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:

NVEC may accept or decline mutual assistance being offered as needed.

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:

NVEC did not request mutual assistance during the Hurricane Beryl event.

SPONSOR:

STAFF 1-94 Please provide a list of any hurricane response staging area you established in the lead up to and in the aftermath of Hurricane Beryl. Please include the date the center(s) was established, the location of the center(s), the day-to-day staffing levels at the center, and types of equipment and personnel staged at the center(s).

RESPONSE:

NVEC did not request mutual assistance during the Hurricane Beryl event.

SPONSOR:

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STAFF 1-95 How did the rollout and deployment of mutual assistance during the events of Hurricane Beryl compare to previous hurricane events during which you requested assistance from mutual assistance programs? In your response, please specifically compare the types and quantities of resources requested, the percentage of request aid provided, the efficacy of coordination between your company and the mutual assistance provider, and the efficiency of staging, deployment, and release of those assistance resources.

RESPONSE:

NVEC did not request mutual assistance during the Hurricane Beryl event.

SPONSOR:

<u>STAFF 1-96</u> Please describe what specific actions you took to begin staging internal staff and any responsive mutual assistance crews or resources.

RESPONSE:

NVEC did not request mutual assistance during the Hurricane Beryl event.

SPONSOR: