



## **Filing Receipt**

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**Item Number - 126**

**PROJECT NO. 56822**

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

**NUECES 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

Nueces Electric Cooperative ("NEC") 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. NEC stipulates that its responses may be treated by all parties as if they were filed under oath.

Dated: August 19\_\_\_\_ 2024,

Respectfully Submitted,

*Joanna Prado*  
*Human Resources & Corporate Communications Manager*

**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:**

- a. July 1, 2024, through July 8, 2024.
- b. Hurricane Beryl was identified as Category 1. Nueces Electric Cooperative's service territory was neither impacted nor affected on July 1, 2024.
- c. The drill conducted on July 1, 2024, did not differ materially from any previous drills as our service territory was not impacted and did not enable us to make any adaptations or changes to our current plan.
- d. Texas Electric Cooperative, Urban Electric.
- e. South Texas Electric Cooperative.
- f. Not Applicable.
- g. Performance during the drill was measured by assessing various aspects of preparedness, response, and recovery. By evaluating these key areas, we could gauge our readiness and effectiveness in handling hurricane situations, ensuring continuous improvement in emergency management practices.
- h. Texas Electric Cooperative (TEC), South Texas Electric Cooperative (STEC) and Urban Electric all provided daily updates on their readiness levels on a daily basis.

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

Yes. NEC involves members in weather-related events as drills to improve our emergency response and communication strategies by providing hurricane preparedness information, outage reporting procedures, safety tips, and updates via email, social media, website, bill inserts, magazines, and newsletters to promote resilience.

**Sponsor:**

Joanna Prado

**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:**

- a. An actual storm shall be used to set the conditions for future hurricane drills until the next storm comes through that impacts our service territory with any lessons learned to utilize and implement at the next storm.
- b. Hurricane Harvey and Hurricane Hannah

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

South Texas Electric Cooperatives (STEC) and Nueces County Emergency Response planning in May of 2024.

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

NEC's operations monitor NOAA and National Hurricane Center forecast products. In addition, the Co-op subscribes to weather notifications through the local National Weather Service office in Corpus Christi, and all employees receive notices of severe weather alerts through a subscription weather service and our partner generation and transmission cooperative, South Texas Electric Cooperative. Additionally, NEC, via STEC's Paid Subscription with Storm Geo and private weather service receives daily updates via its portal and email notification on daily Atlantic weather conditions and potentially hazardous weather conditions. Prior to and during the drill, Storm Geo provides twice daily updates via video calls with a Meteorologist.

**SPONSOR:**

Sergey Seryogin



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

**RESPONSE:**

Storm tracking begins when a potential tropical depression develops in the Atlantic and is forecasted to strengthen over the next 7 days. This could be anywhere from two weeks to 10 days before the storm could disrupt service in our area. Our ERP Alert Levels activated once a potential storm enters areas in the western Atlantic Ocean or Caribbean Sea that are west of 70°W longitude.

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

Storm tracking began June 28<sup>th</sup>, as soon as the NHC issued an advisory for Tropical Depression Two at the time. Our ERP was activate when Hurricane Beryl entered the Caribbean Sea west of 70°W longitude.

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

Yes.

**SPONSOR:**

Sergey Seryogin

**STAFF 1-9** How far in advance of landfall did you initiate requests for mutual assistance?

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

Following a major storm, our restoration efforts are prioritized in the following order: critical accounts, main 3-phase feeders, single-phase lines, and then individual outages. Regarding Hurricane Beryl, we were fortunate not to be impacted and therefore did not need to implement any restoration efforts.

**SPONSOR:**

Manuel Mayorga

**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:**

NEC managers will address complaints and consumer concerns as they arise. Consumers wishing to escalate a complaint will receive a form to file with the NEC Chief Executive Officer and will be provided with the PUCT consumer complaint contact information. A communication plan with Regulatory and Government Entities has been implemented, with key NEC staff identified to communicate with regulatory, government, and EOC personnel. Critical care and chronic condition residential customers and Military priorities are considered, as NEC serves the electric distribution needs of two U.S. Naval Air Stations in Corpus Christi and Kingsville, South Texas. NEC's communications plan ensures that critical load/care customers are contacted as soon as possible before or at the onset of an emergency affecting electric service. The plan includes pre-event news releases with information for critical care and critical load consumers, and a pre-arranged phone notification service to inform critical load customers. Contacting the media and NEC customers promptly before, during, and after restoration efforts is a crucial part of the NEC EOP.

**SPONSOR:**  
Joanna Prado

**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, NEC uses an operating condition system. Refer to Project No. 53385, EOP Filing, Page 31 of 202.

- Alert Level I: This status is declared if a tropical cyclone forms or enters areas in the western Atlantic Ocean or Caribbean Sea that are west of 70°W longitude, the NEC CEO (or designee) shall monitor the storm path and send alert messages by email to all NEC management staff at least once per day.
- Alert Level II: This status is declared if an emergency impact could occur in the NEC service territory within 96 hours; or if a tropical cyclone enters the Gulf of Mexico and the NEC service area is in the National Hurricane Center's cone for possible landfall.
- Alert Level III: This status is declared if an emergency impact is likely to occur in the NEC service territory within 72 hours, or if a tropical cyclone "watch" is issued that includes any portion of the NEC service area.
- Alert Level IV: This status is declared if an emergency impact is likely to occur in the NEC service territory within 36 hours, or if a tropical cyclone "warning" is issued that includes any portion of the NEC service area.
- Alert Level V: This status is declared/exists during an emergency impact, and throughout the response and recovery period.

**SPONSOR:**

Joe Huerta

**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:**

NEC uses an incident command system led by an emergency response team to manage severe weather emergencies, utilizing local employees and contractors. For larger events, NEC has mutual aid agreements with other Texas cooperatives and the National Rural Electric Cooperative Association for out-of-state support. NEC keeps emergency contact information for all relevant personnel and designates certain employees as critical restoration staff, ensuring they can re-enter as soon as possible post-evacuation to help with debris removal and damage assessment.

**SPONSOR:**

Joe Huerta



**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:**

Since the May 2024 Derecho did not affect our service area, no emergency preparations were required. However, for Hurricane Beryl, NEC initiated Alert Level 1 on July 1st. This involved tracking the storm's path and emailing daily alerts to all NEC management.

Refer to Project No. 53385, EOP Filing, Page 31 of 202.

**SPONSOR:**

Joe Huerta

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

**RESPONSE:**

As the May 2024 Derecho did not impact on our service region, our company has no response timeline for this event. On the other hand, for Hurricane Beryl, NEC raised Alert Level 1 on July 1, Alert Level 2 on July 3, Alert Level 3 on July 5, and Alert Level 4 on July 6. Deactivation of alert levels and emergency preparation and response was conducted on July 8 when Beryl was designated to have no major effect to our service region. This process included monitoring the storm's progress, sending daily email alerts to all NEC management, key personnel conducted daily meetings and used all emergency department checklists corresponding to the alert levels.

Refer to Project No. 53385, EOP Filing, Page 46-85 of 202.

**SPONSOR:**

Joe Huerta

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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 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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area on both events.

**SPONSOR:**

Joanna Prado

**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:**

This is not applicable, as our service territory was outside the impacted area for both events.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

None at this time.

**SPONSOR:**

Joanna Prado

### **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. In the aftermath of a hurricane or major storm, our electric cooperative places a high priority on clear, timely, and effective communication with all relevant stakeholders. We maintain direct lines of communication with public safety agencies to address critical infrastructure needs and ensure the safety of the public and our workers. We use multiple channels, including social media, local news outlets, and our website, to keep community members informed about power restoration efforts, safety precautions, and available resources. We communicate with the community to spread information to vulnerable populations, such as the elderly or those with special needs. We conduct after-action reviews following major storms to assess the effectiveness of our communication strategy and identify areas for improvement. We regularly conduct training sessions and use all weather-related events as disaster response drills to ensure our team is prepared to execute the communication strategy effectively.
- b. Augmenting call center staff may involve teleworking, split shifts, and routing overflow calls to the CRC answering service.
- c. NEC's communication strategies will inform retail members of weather updates through media releases for local news (television, radio, newspapers—print and digital), regular social media posts, website announcements, email, and telephone messaging updates.

### **SPONSOR:**

Joanna Prado



**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:**

NEC's communication strategies will inform members of weather events regarding preparation and essential updates through media releases for local news (television, radio, newspapers—print and digital), regular social media posts, website announcements, email, and telephone messaging updates.

**SPONSOR:**

Joanna Prado

**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:**

Not applicable as our service territory was not impacted.

**SPONSOR:**

Joanna Prado

**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:**

NEC continually enhances communication coordination by using the current plan and applying lessons learned for future weather events. For example, each year, our members are encouraged to get their accounts updated with notations of critical care or medical emergencies with the pertinent documentation required from their primary care providers. These updates are evaluated each year prior to each Hurricane Season to help prioritize feeder restoration.

**SPONSOR:**

Joe Huerta

**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:**

NEC continually enhances communication coordination by using the current plan and applying lessons learned for future weather events. Prior to each Hurricane Season, NEC ensures coordination by participating in preseason drills with STEC our TSP and TEC our logistics and material supplier. Additionally, Contract Services are shored up to ensure an adequate work force will be available when the need arises.

**SPONSOR:**

Joe Huerta

**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 or help desks that were available and in operation during or in the aftermath of Hurricane Beryl?

**RESPONSE:**

- a. We have 17 full-time employees and a contracted Cooperative Response Center (CRC) for after-hours support. Additionally, we collaborate with a third-party call center that adds another 280 staff for overflow calls. We've been using these services for over 20 years.
- b. 6% are full-time employees and 94% contracted workers (for after-hours call center help desk support).
- c. The goal is to ensure calls are answered within 4 minutes if not picked up instantly.
- d. At the first initial call.
- e. Each June, all employees participate in Annual Hurricane Preparedness training, which covers emergency response protocols and incorporates lessons learned from past events to enhance communication with members. During a weather event, employees receive timely updates and external communications to ensure we can effectively serve and support our members.
- f. Since our service area was neither affected nor impacted by Hurricane Beryl, the call volume at our centers did not reach its peak levels. Nevertheless, we had NEC employees and CRC contracted staff on standby to manage any emergency calls during this time, ensuring efficient call handling.

**SPONSOR:**

Veronica Garcia

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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 does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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 to our call centers/desks, are recorded and retained for 5 years.

**SPONSOR:**

Joanna Prado



**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.

**SPONSOR:**

Joanna Prado

**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:**

Not applicable.

**SPONSOR:**

Joanna Prado

**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 on-premise 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. NEC has provided a web-based outage viewer to our members since around 2010.
- b. The most recent update to the software was March 4<sup>th</sup>, 2024.
- c. It was working as intended.
- d. It is a web-based outage viewer and easily visible on a mobile device.
- e. English
- f. Both
- g. Cloud based
- h. The web outage viewer is web-based and the only limiting factor for users should be the bandwidth on their end.
- i. Internally NEC had offline mobile maps, paper maps, and a wall mounted map board as backups in the event of losing our outage management system. These were not used.
- j. Not applicable

**SPONSOR:**

Sergey Seryogin

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

NEC has established outage text messaging, automated calls to our members, and leverages various communication channels, including emails, local media, website news, and all social media platforms for any restoration communications. NEC has also partnered with Texas Electric Cooperatives for any assistance with communications if needed.

**SPONSOR:**

Sergey Seryogin

**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:**

NEC was not impacted by Beryl, so no contingencies were required to be activated.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado



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

**RESPONSE:**

NEC did not have any services in the impacted area therefore no contact was made.

**SPONSOR:**

Joanna Prado

**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:**

Our EOP contains printouts (updated by June 1 of each year) of the critical load public safety and industrial consumers and critical care and chronic condition residential customers, as coded in our customer information system. In addition, military priorities exist since NEC serves the electric distribution needs of two U.S. Naval Air Stations – Corpus Christi and Kingsville- in South Texas. If an emergency is anticipated in advance, a new printout is generated to ensure an up-to-date list is used. The residential critical care and commercial critical load registries are managed in accordance with PUCT Substantive Rule 25.497. NEC has a communications plan to ensure critical load/care customers are contacted as soon as reasonably possible either before or at the onset of an emergency affecting electric service. The communications plan includes pre-event news releases, internet phone notification calls, text messaging, and emails to provide information to critical load customers.

Refer to Project No. 53385, EOP Filing, Page 9 of 202.

**SPONSOR:**  
Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

NEC has a communications plan in place to ensure that critical load/care customers are contacted as soon as possible, either before or at the onset of an emergency affecting electric service. This plan includes pre-event news releases, internet phone notification calls, text messaging, and emails to keep critical load customers informed. During a weather event, the frequency of communication is determined by the severity and impact of the storm as we communicate through multiple channels, including phone calls, text messages, and emails, to ensure they receive the information in a way that works best for them. During extended outages, we provide regular updates to keep them informed of progress. Our goal is to keep our critical care, and at-risk customers informed every step of the way to ensure their safety and peace of mind.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

A service restoration plan for service outages caused by extreme or emergency weather events has been implemented.

Refer to Project No. 53385, EOP Filing, Pages 37- 39 of 202.

**SPONSOR:**

Manuel Mayorga

**STAFF 1-44** Please describe the procedures followed for customer restoration of service, including prioritization criteria and timelines for restoration of 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:**

Following a major storm, our restoration efforts are prioritized in the following order: Transmission and Substations, Main 3-phase feeders prioritized based on the critical loads its services, single-phase lines, and then individual outages.

**SPONSOR:**

Manuel Mayorga

**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:**

As our service territory was not impacted on either occasion, NEC has not made any changes or modifications to our Emergency Response Plan.

**SPONSOR:**

Joanna Prado



**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area and had no effect.

**SPONSOR:**

Joanna Prado

**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:**

Our coordination with local, state, and federal agencies, along with other key stakeholders, is essential for ensuring efficient and effective service restoration before, during, and after events like Hurricane Beryl. While NEC was fortunate that Hurricane Beryl did not impact our service territory, we remain committed to maintaining diligent coordination efforts for any current and future events.

**SPONSOR:**

Joe Huerta

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**STAFF 1-51** 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:**

NEC's infrastructure remained intact during Hurricane Beryl, yet insights gained from our neighboring affiliates can enhance our knowledge of service recovery in any crisis.

**SPONSOR:**

Manuel Mayorga

**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, in 2017.

**SPONSOR:**

Joe Huerta

**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.

**SPONSOR:**

Joe Huerta



**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:**

NEC conducts planned inspections across our system through contracted services, complemented by routine line patrols performed by our line crews. We also promptly address any reported pole damage. NEC implements a 10-year rolling inspection program for our distribution feeders, along with third-party pole inspections. In case of a failed inspection, appropriate corrective actions are taken.

**SPONSOR:**

Sergey Seryogin

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

**RESPONSE:**

NEC requires a minimum ROW of 10 feet on either side of both our 3-phase and single-phase distribution lines.

**SPONSOR:**

Sergey Seryogin

**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:**

This is not applicable, as our service territory was outside the impacted area for both events.

**SPONSOR:**

Sergey Seryogin

**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. Driscoll feeders 2 and 4, Orange Grove feeders 1 and 3, Riviera feeder 3, San Diego feeders 1, 3, and 4, Riverside feeder 1, Central feeders 2 and 4. Leaving a total of 26 poles over 60 feet on our system.
- b. Our system was not impacted by either event.
- c. N/A

**SPONSOR:**

Sergey Seryogin

**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:**

NEC uses the standard of 10% of the overall pole height plus two feet. Per RUS (USDA) specifications.

**SPONSOR:**

Sergey Seryogin

**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:**

NEC did not have lines or poles in the impacted area.

**SPONSOR:**  
Joanna Prado

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

**RESPONSE:**

The NESC construction standards and overload factors we currently use have demonstrated their effectiveness in ensuring the resilience of our system. Regular evaluations have confirmed that our infrastructure adheres to essential safety and performance criteria. For instance, by calculating load factors for windmills and performing thorough equipment research and implementation, we've actively fortified our distribution system, leading to improved overload factors.

**SPONSOR:**

Sergey Seryogin

**STAFF 1-61** 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:**

The existing NESC construction standards and overload factors have proven to be effective in maintaining system resiliency within our service area and regular assessments have shown that our current infrastructure meets the required safety and performance benchmarks. For example, calculating load factors on windmills and equipment research and implementation has resulted in proactive strengthening of our distribution system which in turn has led to better overload factors.

**SPONSOR:**

Sergey Seryogin



**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:**

Not applicable as NEC did not have any distribution feeders in the impacted area during either event.

**SPONSOR:**

Joanna Prado

**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:**

NEC had 88,999 poles in service on our lines, however none of these poles were within the impacted area.

**SPONSOR:**

Sergey Seryogin

**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:**

Not applicable as NEC did not have any poles in the impacted area of May 2024 Derecho.

**SPONSOR:**

Joanna Prado

**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:**

Not applicable as NEC did not have any poles in the impacted area of Hurricane Beryl.

**SPONSOR:**

Joanna Prado

**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:**

Not applicable as NEC did not have any poles in the impacted area of either event.

**SPONSOR:**

Joanna Prado

**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 primarily because we believe that such requirements are already in place. Utilities are currently required to ensure any, and all overhead and underground distribution services are engineered to appropriate standards and specifications. Specifically referring to NEC, new construction installations are audited regularly to ensure compliance to such standards, specifications and recognized and generally accepted good engineering practice.

Should it be deemed that more rigorous requirements are necessary to improve distribution resilience for susceptible areas, then those requirements should be adopted by the governing standards driving electrical distribution design. The PUCT should then reference adherence to those adopted standards relative to a certain geographical area.

**SPONSOR:**

Sergey Seryogin

**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:**

This does not apply since we are a Distribution Service Provider only.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply since we are a Distribution Service Provider only.

**SPONSOR:**

Joanna Prado



**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

## **Vegetation Management**

**STAFF 1-73** 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. NEC has a supervising inspector on staff overseeing independent contractors who perform our vegetation management. Currently we employ 11 contractors, 8 tree trimmers and 3 brush clearers
- b. The average size of the vegetation management staff has been the same over the last 5 years, 1 supervising inspector and 11 contractors
- c. Vegetation management is outsourced to a 3<sup>rd</sup> party contractor.
- d. N/A.
- e. NEC does not retain an arborist

## **SPONSOR:**

Sergey Seryogin

**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:**

NEC does not own or maintain the transmission lines within our service area. For our distribution power lines, we operate a dual voltage system (7,200 volts and 14,400 volts). Our vegetation management contractor adheres to strict guidelines, trimming 10 feet on each side of the power pole, resulting in a total clearance of 20 feet. Vegetation is also cleared up to 15 feet below the top of the pole. NEC complies with the standards set by the 2023 National Electric Safety Code (NESC) for vegetation management. Please see the details below.

Distribution Lines (below 69 kv):

- o Generally, clearance distances are smaller:
  - o Up to 13.8 kv: Minimum clearance of about 2 to 4 feet (0.6 to 1.2 meters).
  - o 13.8 kv to 34.5 kv: Minimum clearance of about 4 to 6 feet (1.2 to 1.8 meters).
  - o 34.5 kv to 69 kv: Minimum clearance of about 6 to 10 feet (1.8 to 3 meters).

**SPONSOR:**

Sergey Seryogin

Sergey Seryogin

**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:**

NEC performs routine line patrol inspections throughout our system outside of the planned vegetation maintenance cycles.

**SPONSOR:**

Sergey Seryogin

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

**RESPONSE:**

This does not apply, as NEC does not have lines in the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

NEC uses vegetation management crews year-round; our entire system is in a hurricane prone area.

**SPONSOR:**

Sergey Seryogin



**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:**

This does not apply, as NEC does not have circuits in the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as NEC does not have territory in the impacted area.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

This does not apply, as NEC does not have circuits in the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as NEC does not have power lines in the impacted area.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

NEC's 2024-2027 Work Plan Project included a review and augment of the vegetation management plan.

**SPONSOR:**

Sergey Seryogin

**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:**

This does not apply, as NEC does not have power lines in the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

NEC only performs vegetation management around our power lines, not outside of the existing right of way or utility easements. Vegetation within our service, is usually limited to trees typically similar to Oak and Mesquite trees that may not require us to go well past our ROW to mitigate any hazards. However, if there is a danger tree, we communicate with the landowner and request permission to mitigate the hazards if they exist.

**SPONSOR:**

Sergey Seryogin

**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:**

This does not apply. NEC only performs vegetation management around our power lines, not outside of the existing right of way or utility easements.

**SPONSOR:**

Sergey Seryogin



**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. We have mutual aid agreements in place at a state level with Texas Electric Cooperatives and National Rural Electric Cooperative Association (national) to expedite the restoration of services.
- b. Mutual Aid Agreement attached.
- c. Attached is the list of members or participants for each mutual assistance program in which we are involved.

**SPONSOR:**

Varzavand Irani

**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:**

This does not apply.

**SPONSOR:**

Joanna Prado

**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:**

Even though Hurricane Beryl did not affect us, our Statewide Cooperative TEC, with which NEC has a mutual aid and inventory alliance, ensures fast delivery of emergency supplies should the need arise.

**SPONSOR:**

Varzavand Irani

**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:**

The process and timeline for requesting aid is to be done in writing within a reasonable time after aid is needed and within reasonable specificity.

Refer to Project No. 53385, EOP Filing, Appendix A-2.

**SPONSOR:**

Varzavand Irani

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

When we receive responses to requests for assistance from other mutual assistance program participants, we can evaluate the resources being offered and determine whether to accept or decline them based on our specific needs and current situation.

**SPONSOR:**

Varzavand Irani

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado



**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**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:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

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

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado

**STAFF 1-97** Did you have to train or on-board any personnel that was provided in response to your request(s) for mutual assistance during the events of Hurricane Beryl? If yes, please describe what kind of training or on-boarding you provided.

**RESPONSE:**

This does not apply, as our service territory was outside the impacted area.

**SPONSOR:**

Joanna Prado