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PROJECT NO. 56822

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

**WOOD COUNTY 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

Wood County Electric Cooperative, Inc., a Texas nonprofit electric cooperative company (“WCEC” or “the Cooperative”)¹ 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 RFI’s to Co-ops” or “RFI’s”). Commission Staff directed that responses to Staff’s First RFI’s to Co-ops be filed by August 30, 2024. However, the Cooperative on August 21, 2024, requested and received an extension by email from Staff for filing its responses to September 6, 2024. Thus these responses are timely filed. The Cooperative stipulates that its responses may be treated by Commission Staff or any person that may become a party in this matter as if they were filed under oath. The Cooperative reserves the right to object to the use of the information produced in any contested proceedings or at the time of any hearing as to the admissibility of the information produced.

BACKGROUND / CONTEXT

The Cooperative notes for the historical record that it is responding in good faith to the RFI’s, even though it is the Cooperative’s understanding that the Cooperative is not the primary subject of the investigation in the docket. Furthermore, the Cooperative would respectfully request that Commission Staff recognize that policy makers and legislators in recent legislative hearings

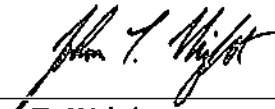
¹ Note, as a member-owned, nonprofit electric cooperative, where its members are the customers and owners, the Cooperative will refer to its “members” in its responses to Staff’s RFI’s regarding “customers” going forward in these responses.

have praised the response of electric cooperatives to the applicable weather events that prompted this investigation.

The Cooperative would also respectfully note that the original deadline for responding to these RFIs only provided eighteen (18) days for the Cooperative to prepare its responses.² Responding to this extensive set of RFIs under such a timeline, despite the positive feedback concerning the response of electric cooperatives to these weather events, has placed a significant burden on the Cooperative and its members when one considers the size of its staff and resources at its disposal. However, the Cooperative has still made a good faith effort in responding to these RFIs to assist Commission Staff with its investigation and to provide information that may aid the Commission in identifying best practices that will serve the public during future major outage events.

Dated: September 4, 2024

Respectfully submitted,



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**ATTORNEYS FOR
WOOD COUNTY ELECTRIC
COOPERATIVE, INC.**

² See 16 Texas Administrative Code (TAC) § 22.144(c)(1), providing 20 days to respond to a request.

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 feedback whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.

RESPONSE:

Due to geographic location, hurricane drills are not typical scenarios. However, we perform tabletop exercises annually for various emergencies, including heavy weather, pandemics, and cyber events.

SPONSOR:

Trey Teaff

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:

We incorporate lessons learned and member feedback from actual events into our Emergency Operations Plan.

SPONSOR:

Trey Teaff

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:

No. We learn from each major event and apply lessons learned and applicable techniques to the given situation.

SPONSOR:

Trey Teaff

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:

None.

SPONSOR:

Trey Teaff

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

RESPONSE:

We use a variety of sources, including: The National Weather Service (Shreveport), Wood County weather alerts, updates from our transmission provider (SPP), MyRadar, local broadcast news sources, and updates from the Texas Department of Emergency Management.

SPONSOR:

C.H. Campbell

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:

We actively and continuously monitor and track all weather systems that may impact our service region.

SPONSOR:

Trey Teaff

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

RESPONSE:

Seven to ten days prior to projected landfall.

SPONSOR:

Trey Teaff

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

RESPONSE:

Yes. We continuously monitor.

SPONSOR:

Paige Eaton

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

RESPONSE:

WCEC did not request mutual assistance for Hurricane Beryl.

SPONSOR:

C.H. Campbell

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:

During major events with extended outage times, there are many factors that can determine the order of the restoration. The practice is to restore the most members with minimum time and effort. Generally, the first step is to ensure the transmission system is intact. If there are transmission problems, manhours will be allocated to restore the transmission system. Next, substations must be checked and restored before the distribution circuits are restored. The larger distribution outages are the next highest priority. Once the main distribution circuit is restored, the focus is on the taps and then individual transformers.

Transmission and substation outages are normally restored with WCEC crews. Right-of-way crews take care of vegetation by addressing trees on the lines or clearing rights-of-way for construction crews to gain access. WCEC uses both in-house and contractor crews for right-of-way and distribution reconstruction. Some distribution crews may be dedicated to replacing poles, while others are restoring other outages with more minor work.

The one priority above everything else is to perform all the work safely. WCEC does not allow two crews to work on the same circuit. This eliminates the possibility of one crew energizing a line on which another crew may be working. There is a conscious effort to maintain separation between crews.

No significant disruption of service due to Hurricane Beryl.

SPONSOR:

C.H. Campbell

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:

COMPLAINTS: During conflict calls with members, the standard process is for a member service representative to attempt to resolve the conflict. If unsuccessful, the call will be transferred to the Director of Human Resources, Member Service, Safety, and Facilities. Further, it can be elevated, as necessary, to the CEO/General Manager. If a complaint and/or issue cannot be resolved by management, WCEC has a Board Policy that provides for forming a Hearing Committee of three Cooperative Board members. As for communication, we have a robust plan that includes many channels that are used as appropriate.

For inbound calls, we can change the front-facing message on our Interactive Voice Response (*IVR*) system with a customized informational message about extended outages. We also inform our overflow call service staffed with live representatives to ensure they are updated with any important messages.

OTHER COMMUNICATIONS:

Member Customers: After evaluating the severity of damage, number of outages, and expected length of time for outages, we may push information to members via direct email or text message, use public-facing messages on our Facebook page with over 12,600 followers, and place alert messages on our website.

The Public: We use the above public-facing channels.

The Media: Usually, broadcast and print media outlets follow our public-facing messages and report on them, but if needed, we issue a press release or proactively make direct contact with them.

State and County Officials and Emergency Operations Centers, Reliability Load Coordinators: We use direct outreach via email or phone, depending on the nature and need.

Critical Load Customers: We maintain a list and make direct contact as appropriate.

SPONSOR:

Paige Eaton

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:

The following is directly from WCEC's Emergency Operations Plan on file with the Commission (*EOP*) under Weather Related Hazards, starting on page 8 of the EOP. The plan will be activated for weather-related events based on the following emergency levels:

Pre-Storm Watch

The situation is before the arrival of an anticipated storm. This is a precautionary situation that would follow a weather broadcast of a severe nature. The Director of Operations, the Director of Human Resources, Member Services, Facilities and Safety, and the Assistant Manager/COO monitor the situation and put employees on alert for potential weather-related events.

- Expected outage time – None
- Customers out of service – None
- Initiated by: Dispatcher

Level 1

An emergency/outage event where cooperative crews can restore service in less than 12 hours without calling for assistance. Personnel assembles as needed. Expected outage time – Up to 12 hours.

- Initiated by Director of Human Resources, Member Service, Safety and Facilities and the Director of Operations.

Level 2

An emergency/outage event where cooperative crews, along with usual contractors, can restore service in less than 48 hours without calling other coops for assistance.

- Expected outage time – 48 hours
- Initiated by the Director of Operations after conferring with the Assistant Manager/COO and the CEO/General Manager

Level 3

An emergency/outage event where cooperative crews may request outside help to restore service. All cooperative employees may be called to report.

- Expected outage time – More than 48 hours
- Initiated by the Director of Operations after conferring with the Assistant Manager/COO and the CEO/General Manager

SPONSOR:

C.H. Campbell

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:

WCEC maintains a detailed emergency operations plan that includes contacts for all resources. Anytime outside crews (mutual assistance and contractors) are called in to aid in restoration, a WCEC employee will be assigned to that crew. Usually, the WCEC employee will be from engineering, but in any case, the WCEC employee will have knowledge of the safety procedures, WCEC service territory, and two-way radio communications. Food is a combination of meals at the headquarters and on their own. Lodging arrangements will be made by WCEC with a hotel in or near our service territory from a list in our EOP.

SPONSOR:

C.H. Campbell

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:

WCEC was not affected by the May 2024 Derecho.

WCEC did not initiate emergency preparations prior to Hurricane Beryl or the Derecho, based on the forecast for our region.

SPONSOR:

C.H. Campbell

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

RESPONSE:

May 2024 Derecho: We were not impacted.

Hurricane Beryl: The first circuit went out on July 8th at 16:17. There were 69 outages. The last outage attributed to Hurricane Beryl started on July 9th at 09:39 a.m. and all outages were restored by 2:15 p.m. of that day. Cleanup activities continued throughout the day.

SPONSOR:

C.H. Campbell

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: N/A

Hurricane Beryl: There were 69 outages affecting 6,466 members. The most out at any one time was approximately 2,600. The average outage duration was 324 minutes, with the longest being a single meter that was de-energized for 922 minutes.

SPONSOR:

C.H. Campbell

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. May 2024 Derecho, no impacts.
- b. The outages were distributed throughout the service territory with minimal impact to the WCEC system.
- c. The longest outage affected a single meter for 922 minutes. It required a transformer replacement.

SPONSOR:

C.H. Campbell

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

RESPONSE:

None.

SPONSOR:

C.H. Campbell

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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:

The May 2024 Derecho was not a major event. Hurricane Beryl impact was minimal in our service areas; therefore no after-action reports were necessary.

SPONSOR:

C.H. Campbell

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

RESPONSE:

No additional information or concerns.

SPONSOR:

C.H. Campbell

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. We maintain a critical loads list and if we expect major impact, we will make direct contact.
- b. In addition to our member services department, we would alert our 24/7 back-up call center. It has several locations well outside of our service territory to offer redundancy.
- c. WCEC is a non-opt-in entity; this is not applicable.

SPONSOR:

Tommy Brown

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:

The May 2024 Derecho was not a major event for WCEC. For Hurricane Beryl, on July 8, we posted a pre-event informational alert on our Facebook page based on forecasters' predictions of high winds, heavy rains and flash flooding that possibly could cause some outages. This information included timeframes for the weather and instructions on how to report any outages. It included a reminder to members to update their contact info with us if they have had any changes. Our page has over 12,600 followers. These include local broadcast and electronic media outlets that pick up our messages and share or broadcast them.

SPONSOR:

Paige Eaton

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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:

Below are the comments on our storm restoration updates on our Facebook page.

The image shows a screenshot of a Facebook post from 'Wood County Electric Cooperative's post'. The post has 19 shares and several comments. The comments are:

- Nisha Wakefield** (Top fan): praying for their safety. 6w Like Reply
- Shirley Caviness** (Top fan): Prayers
- Carolyn Lawrence**: Be safe out there, that's all that matters... 6w Like Reply
- Bek Rogers**: Thanks!!! 6w Like Reply
- Tamber Creek Ranch**: Thank y'all for all the hard work, stay safe 🙏 6w Like Reply
- Rob Fautus**: When did y'all stop working 3rd shift? 6w Like Reply
- Cathy Roberts**: Stay safe!! 6w Like Reply
- Vada Russom Fields** (Top fan): Safety first! 6w Like Reply
- Deborah Mabry**: Stay safe! 6w Like Reply
- Jo Ann Cram**: Stay safe out there! 6w Like Reply
- Andrea Barkor**: Troy Redd

At the bottom of the screenshot, there is a 'Comment as Paige E...' option with icons for tagging, GIFs, and emojis.

SPONSOR:

Paige Eaton

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:

In the past few years, we've made a concerted outreach effort to different communities and Emergency Management teams within our service territory. We will continue to do this and maintain our critical load lists and key contacts for the communities we serve.

SPONSOR:

Tommy Brown

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:

No action is needed now. We keep the lines of communications open and maintain a list of critical facilities so we can make contact when needed.

SPONSOR:

Tommy Brown

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. On site we have eight member services representatives with two additional cashiers who are assigned to member services as needed. We also have an almost 500-employee backup overflow call center that answers calls.
- b. 100% of WCEC's member service representatives and cashiers are full-time.
- c. There is no target wait time. Most calls are answered within 90 seconds, either by in-house staff or our live call center.
- d. We do not have a target time to resolve. Some issues are more complicated than others and we will give each member the time they need to come to a resolution.
- e. We offer on-going training to our member services representatives. During major outage events they receive updated information specific to the event to help resolve calls.
- f. Our office number is limited to 15 simultaneous callers, but the phones will roll over to our backup call center. Our members have several ways to report outages in addition to calling the office number. A separate high-volume outage hotline can be called or texted and the number of simultaneous users is virtually unlimited. Our members can also use our App to report an outage or to reach us by email. They can also reach us by email through our website.

SPONSOR:

Diana Hall

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 8 276 calls received; 18 hours 25 minutes on phones.
July 9 207 calls received; 13 hours 2 minutes on phones. ALL POWER RESTORED.
July 10 220 calls received; 13 hours 31 minutes on phones. (*)
July 11 187 calls received; 12 hours 31 minutes on phones. (*)
July 12 201 calls received; 1 hours 58 minutes on phones. (*)

(*) Included daily peak calls for the week to indicate non-storm-related call volumes.

SPONSOR:

Diana Hall

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:

For Hurricane Beryl, on July 8, we posted a public-facing informational alert on our Facebook page based on forecasters' predictions of high winds, heavy rains and flash flooding that could cause some outages. Our page has a large reach (over 12,600 followers) including some officials and media. The alert included timeframes for the weather and instructions on how to report any outages. It also reminded members to update their contact info with us if they had any changes. Once outages began, we posted restoration updates. Based on the projected length of time for restoration, we did not directly reach out to any local or state leaders.

SPONSOR:

Paige Eaton

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:

The calls that come into member services are recorded and we keep these records indefinitely.

SPONSOR:

Diana Hall

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:

“Priority calls” are generally not recorded or tracked. Calls that concern service which is critical to the recovery and restoration efforts after an event are generally escalated to appropriate management and dealt with on a case-by-case basis to resolve.

SPONSOR:

Diana Hall

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:

There was no pre-recorded storm message during this event based on the forecast for our region.

SPONSOR:

Tommy Brown

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 outage tracker was designed to accommodate the maximum number of simultaneous users.
- 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. WCEC has used a public-facing outage map for over 15 years.
- b. The week of July 1, 2024, our software was updated.
- c. The outage map was operational during Hurricane Beryl.
- d. Yes.
- e. English.
- f. The outage map does not provide circuit or meter information due to member privacy issues.
- g. On-site server.
- h. Our website resides on a shared server that shares resources with other applications. Our outage map is embedded in our website but resides on a secondary server. So, while the initial visit would be to our website, the secondary visit would be to the other server. Both of these resources must be considered. For our website server, many variables quantify how many simultaneous users the server can accommodate before it crashes. It is not necessarily the number of users that causes a server to crash, but rather the number of simultaneous requests from users. Our vendor/host projects that 500 simultaneous active users could be accommodated while others who share the server also use the same resources. In the advent of a severe outage, the host can temporarily scale-out servers to get any extra resources needed to handle any heavier traffic. Secondarily, for the vendor

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server where the outage map resides, it is estimated that it can accommodate any number of users simultaneously.

- i. There are no internal-facing redundancies for the outage map.
- j. The outage map has not been stress-tested.

SPONSOR:

C.H. Campbell

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:

WCEC is not in the greater Houston area.

SPONSOR:

C.H. Campbell

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 web page that has the outage map had approximately 1,270 hits on the 8th and 730 hits on the 9th.

SPONSOR:

C.H. Campbell

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

RESPONSE:

WCEC's membership is updated about outage progress via Facebook, email and/or texts, as well as public-facing messages on our website, depending on circumstances. Our public facing messages are routinely followed by and reported on by broadcast and electronic media outlets. We can also push press releases to the media outlets when needed. Each resource is used and applied as needs dictate.

SPONSOR:

Paige Eaton

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:

May 2024 Derecho: It was not a major event for WCEC.

Hurricane Beryl: Per the processes in Staff RFI No. 1-35, we posted a preparedness statement on July 8, 2024. We then posted updates on July 8, 2024 at 10:05 p.m., and on July 9, 2024 at 6:40 a.m. and 9:25 a.m. We also posted at 2:15 p.m. when all outages were clear. These updates included links to the real-time outage map.

SPONSOR:

Paige Eaton

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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:

County	Meters	Percentage
Camp	499	1%
Franklin	3,259	8%
Hopkins	929	2%
Rains	50	0%
Smith	5,346	13%
Titus	709	2%
Upshur	122	0%
Van Zandt	6,428	16%
Wood	23,813	58%
Total	41,155	100%

SPONSOR:

C.H. Campbell

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:

No contacts, based on the minimal impact to the WCEC service area.

SPONSOR:

CH Campbell

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:

Wood County Electric Cooperative, Inc. EOP (Effective March 15, 2024)

TV Stations: Communications Plan Section 25.53(d) (2): Press releases and contact will be made when appropriate and practical.

Other Critical Infrastructure, Medical/Emergency Response Facilities: Contacts List Annex: Includes a list for all Emergency Management authorities for contact before/during any event as necessary. These include county judges, county emergency managers, fire departments and Sheriff's Offices and Hospitals.

SPONSOR:

Paige Eaton

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:

No contact was made due to minimal impacts to the WCEC service area.

SPONSOR:

Tommy Brown

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:

We will make a reasonable effort to notify those registered on our critical care list, via telephone call in the event of an unplanned or planned outage, depending on the nature and duration.

SPONSOR:

Tommy Brown

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:

C.H. Campbell

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:

Per our Emergency Operations Plan filed with the Public Utility Commission of Texas:

Weather Related Hazards § 25.53(d)(5) The plan will be activated for weather-related events based on the following emergency levels:

Pre-Storm Watch

The situation is before the arrival of an anticipated storm. This is a precautionary situation that would follow a weather broadcast of a severe nature. The Director of Operations, the Director of Member Relations, and the Assistant Manager/COO monitor the situation and put employees on alert for potential weather-related events. Expected outage time – None, Customers out of service – None, Initiated by Dispatcher.

Level 1

An emergency/outage event where cooperative crews can restore service in less than 12 hours without calling for assistance. Personnel assembles as needed. Expected outage time – Up to 12 hours. Initiated by Director of Member Relations and Director of Operations.

Level 2

An emergency/outage event where cooperative crews, along with usual contractors, can restore service in less than 48 hours without calling other coops for assistance. Expected outage time – 48 hours. Initiated by the Director of Operations after conferring with the Assistant Manager/COO and the CEO/General Manager .

Level 3

An emergency/outage event where cooperative crews may request outside help to restore service. All cooperative employees may be called to report. Expected outage time – More than 48 hours. Initiated by the Director of Operations after conferring with the Assistant Manager/COO and the CEO/General Manager.

Annexes §25.53(e)

Weather Annex §25.53(e)(1)(A) Weather is monitored through several sources, both state and local. As adverse weather conditions arise, the Assistant Manager/COO, the Director of Operations, and the Director of Member Relations will make plans to alert employees and

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contractors of potential need to respond to work. Wood County has an emergency alert system to issue alerts to citizens. Adverse weather conditions will be communicated to our members and employees through various channels.

SPONSOR:

CH Campbell

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:

Customer restoration is done in this order: Transmission power, substations power, main circuits, feeders then individual services. Restoration to hospitals, nursing homes/care facilities, police and fire stations are prioritized as necessary.

SPONSOR:

Tommy Brown

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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:

No changes made.

SPONSOR:

C.H. Campbell

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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:

COUNTY	DATE	MEN
Franklin	7/8/24	6
Smith	7/8/24	9
Van Zandt	7/8/24	3
Wood	7/8/24	16
TOTAL		34

SPONSOR:

C.H. Campbell

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:

WCEC did not have any members out of power for any whole day. Fifteen hours was the longest any single member was out.

SPONSOR:

C.H. Campbell

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:

Personnel handling calls take necessary information regarding outages. Service restoration is determined based upon impacts to the WCEC system.

SPONSOR:

Tommy Brown

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:

There was no coordination effort required for Hurricane Beryl due to minimal impact to WCEC's system.

SPONSOR:

Tommy Brown

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:

No major challenges during this event.

SPONSOR:

C.H. Campbell

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:

Minimal impacts, nothing new to add to future restoration efforts.

SPONSOR:

C.H. Campbell

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:

Tommy Brown

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. We conduct tabletop drills annually, and review and update our Emergency Operations Plan (*EOP*) that is filed with the PUCT. The EOP outlines the roles and responsibilities of management personnel, including those that interact with local and state officials and other utilities.

SPONSOR:

Trey Teaff

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:

- a. Pole inspections are conducted on a ten-year cycle.
- b. We have sound, imaging and visual tests conducted by a vendor that stores the data in a Geographic Information System (*GIS*).
- c. Priority poles based upon testing are replaced.

SPONSOR:

CH Campbell

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

RESPONSE:

Both 3-phase and single-phase have 30' ROWs.

SPONSOR:

C.H. Campbell

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:

See Attachment A – Pole Information.

SPONSOR:

C.H. Campbell

Pole Information

Substation	Circuit	Type		Falures		Cause	Point of Failure	NESC Construction	Loading District	Plan to Rebuild	Rebuild Timeframe
		Wood	Concrete	Quantity	Percentage						
Aldridge	East	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Aldridge	West	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Burges	Sandflat	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Clyde Brady	St. Mary	99%	1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Clyde Brady	Winona	100%	<1%	1	<1%	Tree	Broke Pole	Grade B	Heavy	No	N/A
Crow	Fellowship	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Crow	North	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Faulk-Dob	Big Sandy	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Faulk-Dob	Pine Mills	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Faulk-Dob	Red Springs	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Faulk-Dob	West	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
G V West	Jamestown	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Hill-Wlsn	East	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Hill-Wlsn	North	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Jarred-Wl	Ogbum	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Merrill-C	Monticello	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Merrill-C	Mt. Vernon	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
MorrisCha	North	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
MorrisCha	Pineview	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
MorrisCha	South	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Mt. Vernon	Glade Springs	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Nichols	Pleasant Grove	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Puckett-R	Hoard	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
QuitmanN	East	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
QuitmanN	PO & Coop	98%	2%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
QuitmanS	Hainsville	98%	2%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Shaw	North	99%	1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Shaw	South	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Tunnell-C	Creagleville	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Walker-East	South	100%	<1%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Walker-West	High School	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
Weems	Sharon	98%	2%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A
WilliamsZ	Salem	100%	0%	0	0%	N/A	N/A	As reqd by NESC	Heavy	No	N/A

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:

N/A.

SPONSOR:

C.H. Campbell

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:

Rural Utility Services (*RUS*) specifies 10% of the pole height + 2', which is the standard we apply.

SPONSOR:

C.H. Campbell

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:

Single phase 40/5, three phase 40/4.

SPONSOR:

C.H. Campbell

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

RESPONSE:

As required by NESC, most distribution is built to Grade C construction, except where required to build to Grade B. WCEC is on the border of the medium and heavy zones, so heavy is used in all cases.

SPONSOR:

C.H. Campbell

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:

WCEC has not changed design criteria in the last two years. Design is equal to or greater than NESC requirements.

SPONSOR:

C.H. Campbell

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:

See Attachment B – Distribution Feeders.

SPONSOR:

C.H. Campbell

Distribution Feeders

Substation	Circuit	Type		Falures		Cause	Point of Failure	NESC Construction	Loading District	Plan to Rebuild	Rebuild Timeframe
		Wood	Concrete	Quantity	Percentage						
Aldridge	East	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Aldridge	West	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Burges	Sandflat	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Clyde Brady	St. Mary	99%	1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Clyde Brady	Winona	100%	<1%	1	<1%	Tree	Broke Pole	Grade B	Heavy	No	N/A
Crow	Fellowship	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Crow	North	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Faulk-Dob	Big Sandy	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Faulk-Dob	Pine Mills	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Faulk-Dob	Red Springs	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Faulk-Dob	West	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
G V West	Jamestown	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Hill-Wlsn	East	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Hill-Wlsn	North	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Jarred-Wl	Ogburn	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Merrill-C	Monticello	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Merrill-C	Mt. Vernon	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
MorrisCha	North	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
MorrisCha	Pineview	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
MorrisCha	South	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Mt. Vernon	Glade Springs	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Nichols	Pleasant Grove	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Puckett-R	Hoard	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
QuitmanN	East	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
QuitmanN	PO & Coop	98%	2%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
QuitmanS	Hainsville	98%	2%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Shaw	North	99%	1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Shaw	South	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Tunnell-C	Creagleville	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Walker-East	South	100%	<1%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Walker-West	High School	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
Weems	Sharon	98%	2%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A
WilliamsZ	Salem	100%	0%	0	0%	N/A	N/A	As rqd by NESC	Heavy	No	N/A

Project No. 56822
WCEC Response to
Staff RFI 1-62,
ATTACHMENT B

Project No. 56822 WCEC's Response to Staff's First Set of RFIs to Targeted Electric CO-OPs

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:

The May 2024 Derecho did not impact WCEC.

SPONSOR:

C.H. Campbell

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:

The May 2024 Derecho did not impact WCEC.

SPONSOR:

C.H. Campbell

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:

One 40/4 wood distribution pole failed during Hurricane Beryl due to structural loading from vegetation. This pole was designed to NESC requirements at the time of design using class C construction in the heavy loading district.

SPONSOR:

C.H. Campbell

Project No. 56822 WCEC's Response to Staff's First Set of RFIs to Targeted Electric CO-OPs

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:

May 2024 Derecho – N/A

Hurricane Beryl – One pole broke in Smith County. The line this pole was on was rebuilt in February 2024 due to Charter Communications' joint use (Work Order No. 232636). All poles out of this substation are scheduled to be inspected in 2024.

SPONSOR:

C.H. Campbell

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:

Not applicable. Electric cooperatives are not defined as an “electric utility” under state law and Commission rules.³ While electric cooperatives already follow and implement NESC standards, the Boards of Directors of electric cooperatives maintain exclusive authority over all matters pertaining to electric cooperative systems.⁴

Moreover, a universal mandate would not take into account the specific characteristics of the local electric system which may vary depending on its location in what may be a broad swath of “hurricane prone areas.”

SPONSOR:

C.H. Campbell with advice and co-sponsorship from WCEC's General Counsel John T. Wright

³ Public Utility Regulatory Act (PURA) § 31.002 (6). 16 Texas Administrative Code (TAC) § 25.5 (137).

⁴ PURA § 41.055. PURA § 41.004.

Transmission Infrastructure

STAFF 1-68 Please explain your process for evaluating the hardening of transmission lines. If you file an annual storm hardening report under 16 TAC § 25.95, do not merely recite information provided in those filings. In your response, please include an explanation for the following:

- a. How frequently this evaluation is conducted?
- b. What criteria is utilized for this evaluation?
- c. When do you decide to harden transmission lines?

RESPONSE:

- a. WCEC is not required to evaluate or report on the hardening of transmission lines.
- b. WCEC performs an annual aerial inspection of all transmission lines.
- c. WCEC is in the process of rebuilding and upgrading wood structures to metal pole structures.

SPONSOR:

C.H. Campbell

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:

N/A.

SPONSOR:

C.H. Campbell

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:

N/A.

SPONSOR:

C.H. Campbell

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:

No transmission structure failures.

SPONSOR:

C.H. Campbell

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:

N/A.

SPONSOR:

C.H. Campbell

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. WCEC currently employs eight full-time vegetation staff in-house and is in the process of adding two additional. WCEC also employs nine hourly contract crews with a total of 17 people, and two contract companies perform cycle trimming. The number of crews vary depending on what is necessary.
- b. Prior to 2024, WCEC employed ten in-house vegetation staff and ten contract crews with a total of 27 employees.
- c. Several factors determine the level of vegetation staff: the ability to meet cycle times, the ability to address dead and danger trees, hot spot control trimming areas that fall outside normal cycle times, as well as the ability to have crews on hand for outage restoration.
- d. 2024 is the first year WCEC has used all contract crew circuit trimming. The use of in-house crews to perform circuit mile cycle trimming is no longer cost-effective. In-house crews are mainly used to clear new right-of-way's, remove dead or dangerous trees, and for outage restoration.
- e. WCEC uses one of our contract companies for arborist consulting.

SPONSOR:

C.H. Campbell

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:

All of WCEC's transmission lines have at least a 75' easement, which is mowed yearly to prevent trees from growing. Most of WCEC's distribution lines have a 30' right of way. The trimming cycle is eight years.

SPONSOR:

C.H. Campbell

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:

If an area encounters problems outside the normal trim cycle, WCEC will dispatch a crew to take care of hot spots.

SPONSOR:

C.H. Campbell

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:

No such logs readily available; however, the Cooperative does maintain robust vegetation management rotations.

SPONSOR:

C.H. Campbell

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:

Not applicable. Due to geographic location, WCEC is not in a hurricane prone area.

SPONSOR:

C.H. Campbell

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:

See Attachment C – Circuits.

SPONSOR:

C.H. Campbell

Circuits

Substation	Circuit	Outage Start Time	Interruption Duration (Min)	Voltage (V)	Customers Restored	Outage Cause
Clyde Brady	Winona	7/8/2024 16:17	529	12470	629	Tree/Limb
QuitmanN	PO & Coop	7/8/2024 16:43	43	7200	1	Tree/Limb
Aldridge	West	7/8/2024 16:45	104	7200	25	Tree/Limb
Tunnell-C	Creagleville	7/8/2024 16:46	98	7200	43	Tree/Limb
Faulk-Dob	West	7/8/2024 16:47	121	7200	7	Tree/Limb
Walker-East	South	7/8/2024 17:23	46	12470	1852	Tree/Limb
Faulk-Dob	Pine Mills	7/8/2024 17:26	120	7200	4	Tree/Limb
MorrisCha	North	7/8/2024 18:14	78	12470	44	Tree/Limb
Shaw	South	7/8/2024 18:22	187	7200	10	Tree/Limb
Faulk-Dob	Big Sandy	7/8/2024 18:32	235	7200	21	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 18:32	103	7200	36	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 18:32	103	7200	37	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 18:32	103	7200	17	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 18:32	103	7200	1	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 18:32	103	7200	1	Tree/Limb
Faulk-Dob	Red Springs	7/8/2024 18:45	63	12470	93	Tree/Limb
Shaw	North	7/8/2024 18:50	92	7200	1	Tree/Limb
Burges	Sandflat	7/8/2024 19:07	236	7200	1	Wind
Shaw	South	7/8/2024 19:09	79	12470	58	Tree/Limb
Shaw	South	7/8/2024 19:11	82	7200	1	Tree/Limb
QuitmanS	Hainsville	7/8/2024 19:17	98	7200	55	Tree/Limb
Tunnell-C	Creagleville	7/8/2024 19:54	233	7200	2	Tree/Limb
Puckett-R	Hoard	7/8/2024 20:12	164	12470	60	Tree/Limb
Puckett-R	Hoard	7/8/2024 20:12	763	12470	33	Tree/Limb
Aldridge	West	7/8/2024 20:17	109	12470	73	Tree/Limb
MorrisCha	South	7/8/2024 20:18	922	7200	1	Tree/Limb
MorrisCha	South	7/8/2024 20:18	921	7200	2	Tree/Limb
MorrisCha	North	7/8/2024 20:51	68	7200	55	Tree/Limb
QuitmanN	East	7/8/2024 20:54	148	12470	615	Tree/Limb
G V West	Jamestown	7/8/2024 20:57	97	7200	13	Tree/Limb
WilliamsZ	Salem	7/8/2024 20:57	715	7200	5	Tree/Limb
Weems	Sharon	7/8/2024 21:00	622	7200	40	Tree/Limb
Shaw	South	7/8/2024 21:10	595	12470	327	Tree/Limb
Crow	North	7/8/2024 21:17	175	12470	278	Tree/Limb
Clyde Brady	St. Mary	7/8/2024 21:18	737	7200	2	Tree/Limb
MorrisCha	Pineview	7/8/2024 21:23	662	12470	244	Tree/Limb
Crow	Fellowship	7/8/2024 21:35	275	7200	17	Tree/Limb
Merrill-C	Monticello	7/8/2024 21:39	111	7200	38	Tree/Limb
Merrill-C	Monticello	7/8/2024 21:39	113	7200	1	Tree/Limb
Jarred-Wl	Ogburn	7/8/2024 21:49	569	7200	78	Tree/Limb
Merrill-C	Mt. Vernon	7/8/2024 22:02	808	7200	8	Tree/Limb
Crow	Fellowship	7/8/2024 22:04	232	7200	5	Tree/Limb
Jarred-Wl	Ogburn	7/8/2024 22:14	651	7200	52	Tree/Limb
Mt. Vernon	Glade Springs	7/8/2024 22:36	548	12470	148	Tree/Limb
Walker-						
West	High School	7/8/2024 22:36	574	7200	39	Tree/Limb
Aldridge	East	7/8/2024 22:59	574	12470	579	Tree/Limb
Hill-Wlsn	East	7/8/2024 23:08	665	7200	3	Tree/Limb
Merrill-C	Monticello	7/8/2024 23:11	Page 85 of 132	7200	65	Tree/Limb

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WCEC
Response to
Staff RFI
1-78,
ATTACHMENT C

Crow	North Pleasant	7/9/2024 2:12	401	7200	17	Tree/Limb
Nichols	Grove	7/9/2024 2:13	354	7200	5	Tree/Limb
Shaw	South	7/9/2024 7:08	32	12470	213	Tree/Limb
Walker-West	High School	7/9/2024 7:30	40	7200	2	Tree/Limb
Aldridge	East	7/9/2024 9:06	142	7200	11	Tree/Limb
Hill-Wlsn	North	7/9/2024 9:39	80	7200	11	Tree/Limb

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:

See Attachment D – Aerial Maps.

SPONSOR:

C.H. Campbell

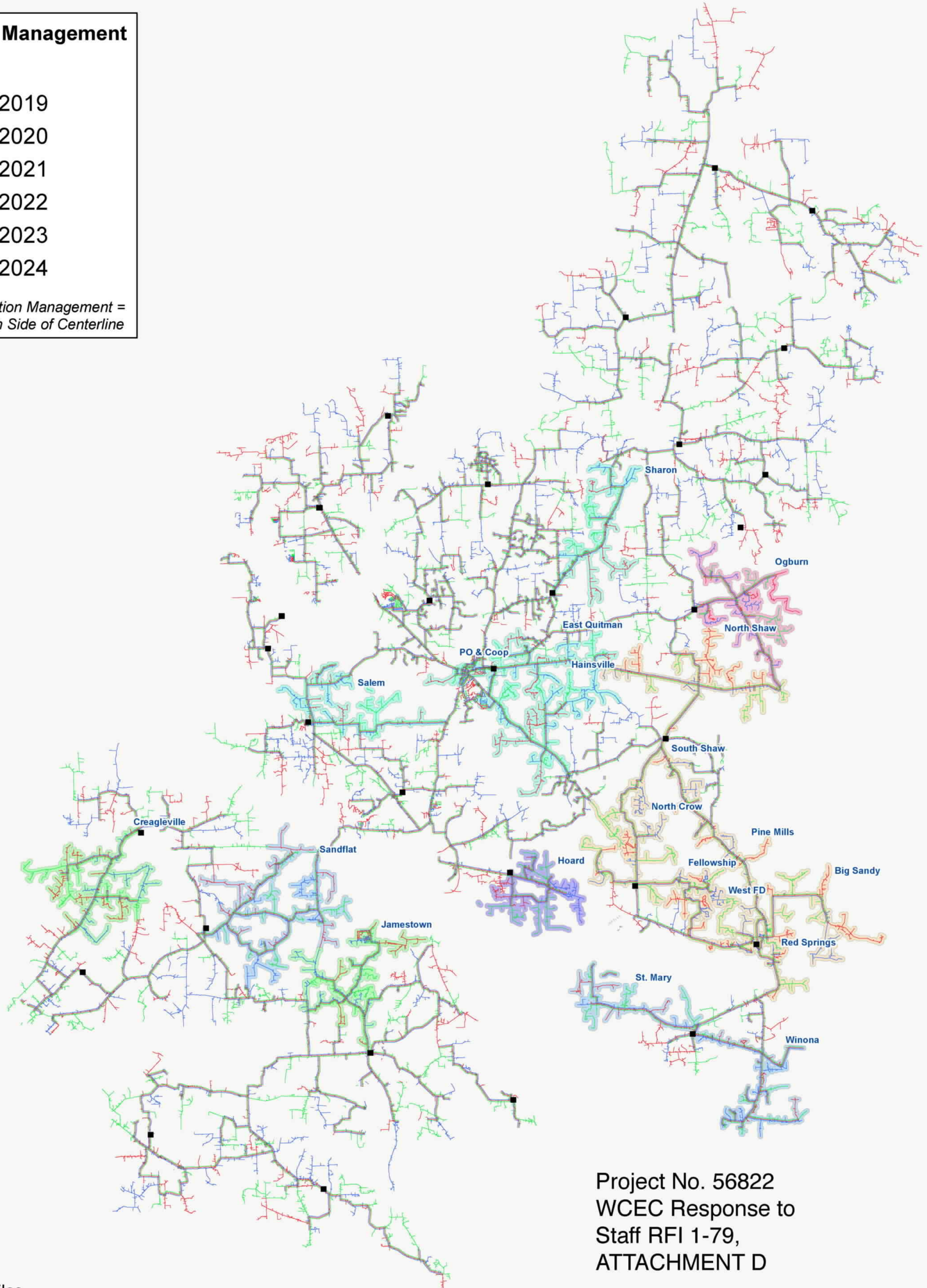
WOOD COUNTY ELECTRIC COOP - TX-54

ROW Management

Year

- 2019
- 2020
- 2021
- 2022
- 2023
- 2024

**Vegetation Management = 15' Each Side of Centerline*



Project No. 56822
WCEC Response to
Staff RFI 1-79,
ATTACHMENT D

1 in = 3 miles

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:

May 2024 Derecho: N/A

Hurricane Beryl: approximately 78%

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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:

WCEC will continue to follow the work plan in place for 2024. WCEC experienced minimal damage due to either storm.

SPONSOR:

C.H. Campbell

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

RESPONSE:

The 2024 budget, reviewed and approved in 2023, included an increase in the dollars appropriated to Vegetation Management. We also changed the method of bidding the work out from an hourly rate to a per-mile rate.

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Project No. 56822 WCEC's Response to Staff's First Set of RFIs to Targeted Electric CO-OPs

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:

	Franklin	Hopkins	Smith	Titus	Van Zandt	Wood	Total
Tree/Limb	67%	50%	80%	67%	67%	84%	78%

SPONSOR:

C.H. Campbell

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:

When a hazard tree is identified by WCEC, we contact the landowner to remedy the problem. We also have a tree trimming request form on our website for members to report trouble trees. *See* WCEC's webpage at <https://www.wcec.org/services/vegetation-management/tree-trimming-request-form/>

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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:

All eight in-house vegetation staff, as well as six servicemen.

SPONSOR:

C.H. Campbell

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. WCEC participates in mutual assistance through Texas Electric Cooperative (TEC).
- b. *See* Attachment E – Mutual Aid Agreement.
- c. Bailey Co. EC, Bandera EC, Bartlett EC, Big Country EC, Bluebonnet EC, Bowie-Cass EC, Brazos EC, Bryan Texas Utilities, Central Texas EC, Cherokee Co. ECA, Coleman Co. EC, Comanche EC, Concho Valley EC, CoServ Electric, Deaf Smith EC, Deep East Texas EC, East Texas EC, Fannin EC, Farmers EC, Fayette EC, Gort Belknap EC, Golden Spread EC, Grayson-Collin EC, Greenbelt EC, GVEC, Hamilton EC, Harmon EA, Heart of Texas EC, HILCO EC, J-A-C EC, Jackson EC, Jasper-Newton EC, Karnes EC, Lamar EC, Lamb C. EC, LCRA, Lea Co. EC, Lighthouse EC, Lyntegar EC, Magic Valley EC, Medina EC, MidSouth EC, Nararro Co. EC, Navasota Valley EC, North Plains EC, Northeast Texas EC, Nueces EC, Panola-Harrison EC, Pedernales EC, PenTex Energy, Rayburn Country EC, Rio Grande EC, Rita Blanca EC, Rusk Co. EC, Sam Houston EC, San Bernard EC, San Miguel EC, San Patricio EC, South Plains EC, Southwest Arkansas EC, Southwest Rural EA, Southwest Texas EC, Swisher EC, Taylor EC, Tri-County EC, Tri-County EC OK, Trinity Valley EC, United Cooperative Services, Upshur Rural EC, Victoria EC, Western Farmers EC, Wharton Co. EC, Wise EC, Wood Co. EC.

SPONSOR:

C.H. Campbell

TEXAS ELECTRIC COOPERATIVES – GROUP 1 COOPERATIVES

Project No. 56822
WCEC Response to
Staff RFI 1-86b,
ATTACHMENT E

AGREEMENT ON BILLING OF ASSISTANCE
DURING MAJOR POWER OUTAGES

April 3, 2001

RECEIVED
APR 30 2001

The 10 Cooperatives of Group 1 hereby agree that all assistance during major power outages shall be billed in the following manner:

1. Employees are to be paid 1.5 times their hourly wage for every hour worked.
Hours worked include travel time to and from the home coop to the coop seeking help and hours actually worked. Rest periods at the motel are not considered hours worked.
a. Exception – The Cooperative seeking assistance shall honor labor contracts of the Cooperative sending employees if it differs from the above statement.
2. Social Security and Medicare tax on the above labor costs.
3. Workers Comp premium on above labor costs.
4. Materials used from the Cooperative's warehouse.
5. Motel room charges including phone calls.
6. Meals and snacks.
7. Charges for special equipment used by the Assisting Cooperative, shall be at the reasonable and customary rates incurred for such equipment by the Assisting Cooperative.
8. Gasoline/Diesel Fuel used by a vehicle or equipment once it reaches its place of work and not provided by the Cooperative seeking help.

Barron Christmas
Bowie-Cass EC

Frey Jones
Cherokee County EC

Larry Warren
Deep East Texas EC

Edd Hargett
Houston County EC

Jud A Solby
Jasper-Newton EC

W. Whentworth
Panola-Harrison EC

Jose A Bankhead
Rusk County EC

W. Stuebel
Sam Houston EC

John D. Dyer
Upshur-Rural EC

Debbie Robinson
Wood County EC

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:

WCEC did not need or use mutual assistance crews prior to, during, or in the aftermath of Hurricane Beryl.

SPONSOR:

C.H. Campbell

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:

C.H. Campbell

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:

N/A.

SPONSOR:

C.H. Campbell