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

PUBLIC UTILITY COMMISSION

OF TEXAS

UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Not applicable.

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

PUBLIC UTILITY COMMISSION

OF TEXAS

UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-73 Provide the following information concerning your vegetation management:

- 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. URECC currently employs 2 certified arborists full-time and 30 contractors.
- b. URECC has had 2 full-time vegetation management staff in the past 5 years and 30 contractors.
- c. The determined full-time vegetation management staff is based on workload.
- d. URECC does not use in-house crews.
- e. URECC has permanent full-time arborist vegetation staff.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Vegetation clearances are cut on a rotation to match the easement width for the particular line. Distribution ROW easements are 30 feet wide/15 feet to centerline; 69 kV transmission lines are 80 feet wide/40 feet to centerline; and 138 kV transmission lines are 100 feet wide/50 feet to centerline.

All ROWs are ground to the sky with minimum canopy as can be achieved with reasonable means.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Please see response to Staff 1-54 for URECC's proactive inspection practices.

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

PUBLIC UTILITY COMMISSION

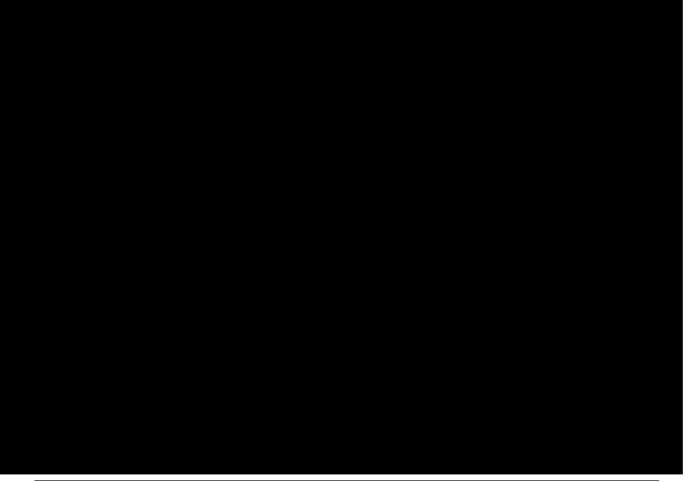
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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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

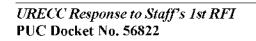
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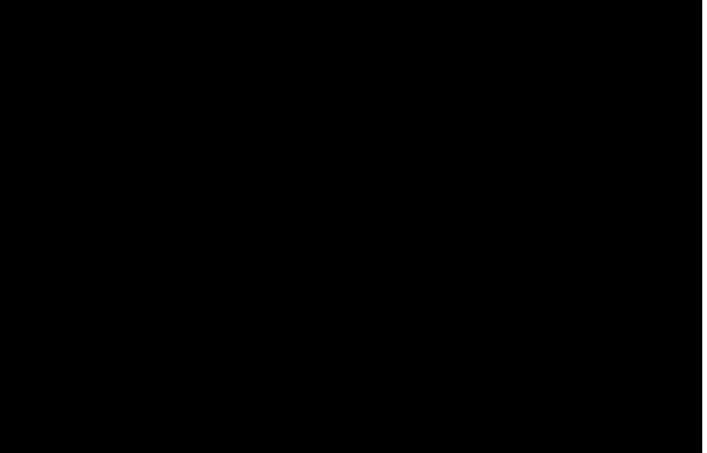
See Below: <u>URECC Vegetation Management - Five-Year Inspection Log and Field Notes</u>

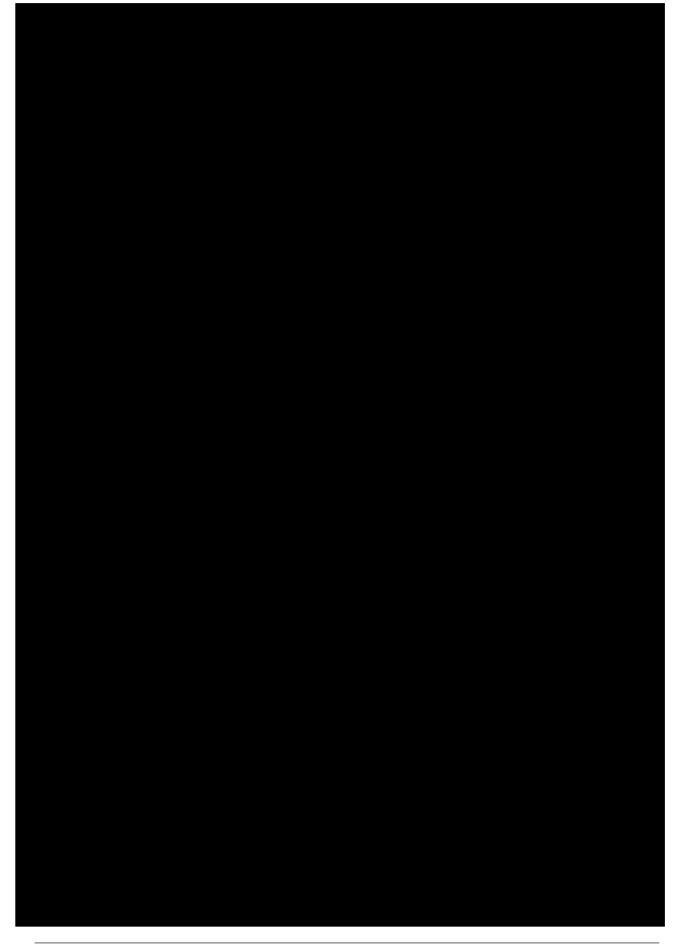


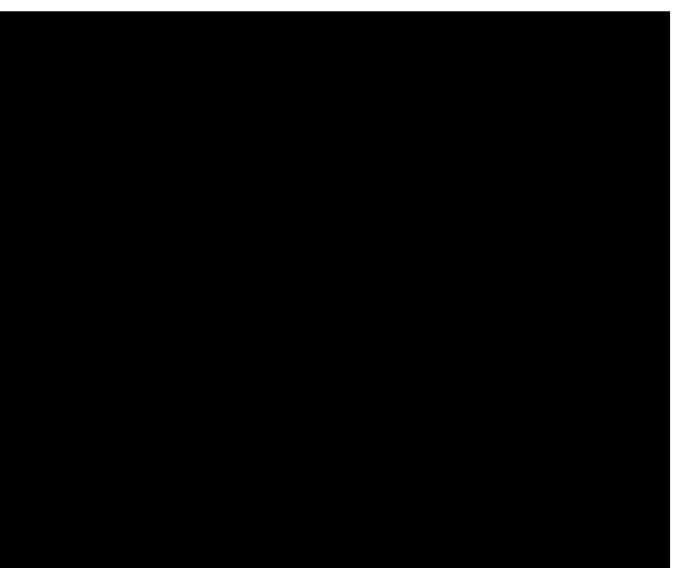








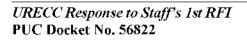


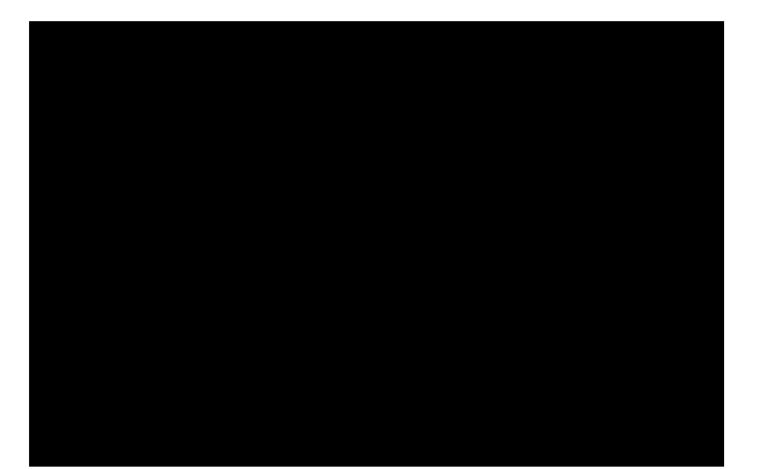








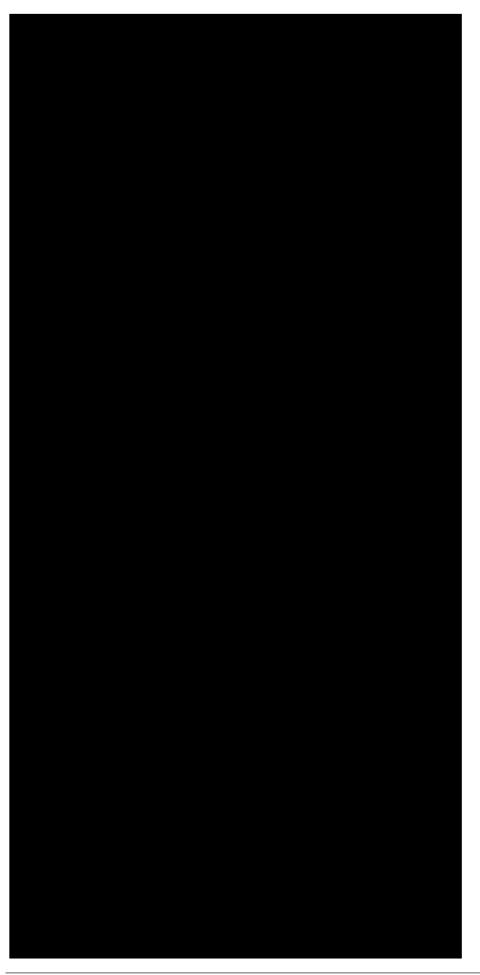








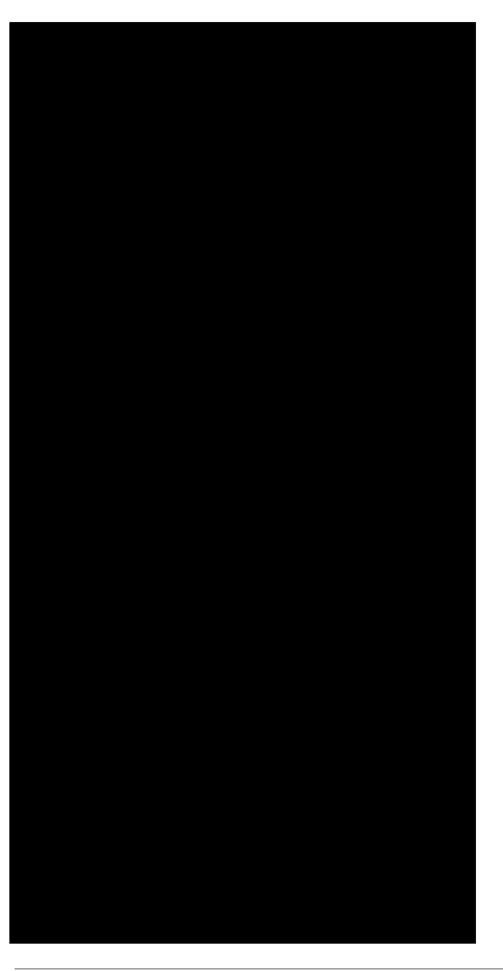


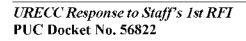


URECC Response to Staff's 1st RFI PUC Docket No. 56822











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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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. URECC is not located in a hurricane-prone area.

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

OF TEXAS

UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- 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:

The following circuits experienced a vegetation-related outage during Hurricane Beryl.

a) Sub	a) Feeder	b) Time Off	b) Time On	b) Duration	c) Voltage	d) Cause Desc	e) NERC Category
Big Sandy	245	7/10/2024 10:52	7/10/2024 11:25	0:33	12,47 kV	H/W Off Row-Mature-Alive	Unknown
Mt Eara	685	7/8/2024 16:56	7/8/2024 18:22	1:25	12.47 kV	H/W Off Row-Mature-Allve	Unknown
Piney Woods	650	7/9/2024 6:56	7/9/2024 18:44	11:48	12.47 kV	Pine off Row- Mature- Allve	Unknown
Gilmer	116	7/9/2024 8:28	7/9/2024 19:26	10:58	12.47 kV	Vegetation	Unknown
Kilgore South	195	7/10/2024 10:39	7/10/2024 11:47	1:08	12.47 kV	Tree limb on service wire	Unknown
Lake O Pines	235	7/10/2024 8:34	7/10/2024 10:17	1;43	12.47 kV	H/W Off Row-Young-Dead	Unknown
Holly Lake	675	7/8/2024 19:13	7/9/2024 20:09	24:55:00	12,47 kV	Pine off Row- Young- Dead	Unknown
Little Mound	350	7/8/2024 13:03	7/8/2024 13:49	0:45	12.47 kV	HAW Off Row-Mature-Alive	Unknown
Rocky Mound	450	7/9/2024 10:59	7/9/2024 11:17	0:17	12,47 kV	HAW Off Row-Mature-Alive	Unknown
Gitmer	116	7/8/2024 18:42	7/9/2024 18:48	24:06:00	12.47 KV	Pine off Row- Mature- Dead	Unknown
Cox	.590	7/8/2024 12:58	7/8/2024 15:02	2:04	12.47 kV	H/W Off Row-Mature-Dead	Unknown
Hallsville North	210	7/8/2024 12:25	7/8/2024 12:54	0:29	12.47 kV	Pine off Row- Young- Alive	Unknown
Lake O Pines	220	7/8/2024 14:23	7/8/2024 15:13	0:49	12,47 kV	H/W Off Row-Young-Dead	Unknown
Harteton	420	7/9/2024 7:00	7/9/2024 11:26	4:26	12.47 kV	HAW Off Row-Mature-Alive	Unknown
Gilmer	116	7/8/2024 18:29	7/9/2024 18:54	24:25:00	12:47 kV	H/W Off Row-Mature-Alive	Unknown
Diana East	130.	7/8/2024 19:28	7/8/2024 21:05	1:36	12.47 kV	Pine off Row- Mature- Dead	Unknown
Jefferson	260	7/8/2024 16:29	7/8/2024 20:07	3:38	12.47 kV	H/W Off Row Mature Alive	Ünknown
Diana West	120	7/9/2024 2:02	7/9/2024 7:47	5:44	12.47 kV	Tree limb on primary	Unknown
Jefferson	275	7/9/2024 2:57	7/9/2024 11:16	8:18	12.47 kV	H/W off Row-Young-Alive	Unknown

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-79 Please provide aerial maps of circuits and their easements that experienced a vegetationrelated 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 for each year. Provide any additional information or details to show clarity.

Response:



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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Approximately 2.64% of outages were coded as vegetation-related during Hurricane Beryl. During major events such as hurricanes, tornadoes, ice storms, and other severe weather events, dispatchers typically classify the outage using the cause code "major events."

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

No additional steps are currently needed.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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

Response:

URECC bids its vegetation management needs out annually. URECC evaluates the system's needs at each annual bid and adjusts to what needs to be done.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Approximately 1.92% of all outages during Hurricane Beryl were coded as trees or branches outside of right of way. Approximately 0.72% were vegetation-related but were not specified as either inside or outside right of way.

					Percentage Tree		Percentage Tree
			Percentage		Limb/Branch	Percentage Tree	Limb/Branch ROW
	Vegetation-	Tree/Branch off	Tree/Branch off	Tree Limb/Branch	ROW	Limb/Branch off	Unspecified for All
County	Related # Out	ROW	ROW	ROW Unspecified	Unspecified	ROW for All Outages	Outages
Camp	7.	7	1.29%	0	0.00%	0.03%	0,00%
Gregg	4	0	0.00%	4	0.74%	0.00%	0.02%
Harrison	17	. 17	3.14%	0	0.00%	0.08%	0.00%
Marlon	278	278	51.29%	0	0.00%	1.35%	0.00%
Smith .	. 1	i	0.18%	0	0.00%	0.00%	0.00%
Upshur	229	86	15.87%	.143	26.38%	0.42%	0,70%
Waad	.6	6	1.11%	0	0.00%	0.03%	0.00%
TOTAL	542	395	72.88%	147	27.12%	1.92%	0.72%
TOTAL OUTAGES	20539						

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

URECC does not have a program that evaluates potentially hazardous vegetation outside of its ROW. However, in most cases, as vegetation management crews move along prescribed circuit cuts, they will identify dead, diseased and leaning trees that are considered as a potential risk. Vegetation managers then review and engage landowners as deemed necessary to handle instances outside of the ROW. Other employees, such as engineering technicians and servicemen, will also identify these situations and turn them over to the vegetation management group. Finally, there are numerous Members, URECC Managers, and URECC Board Members who communicate known issues to the vegetation management group.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

URECC has 2 full-time employees and 6 contractors who address vegetation management hazards outside of the ROW.

Staffing and Mutual Assistance

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- Staff 1-86 Please state whether you participate 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:

Yes.

- a. URECC participates in the Texas Electric Mutual Assistance Program.
- b. See the Mutual Aid Agreement below.

[/end confidential]



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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

URECC did not use mutual aid during the hurricane. All assistance was provided by contractors. Most of the mutual aid available was to those near the coast who needed it. There are rarely any coordination issues with mutual aid situations.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-89 Please describe the process and timelines 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:

Texas Electric Cooperative (TEC) assists in the management of needs for Texas Coops from a mutual aid perspective. The first round of mutual aid may come from those coops near us and is arranged on a coop-to-coop basis. If those nearest are unavailable, TEC is the outreach to manage those next levels of assistance needs. Typically, there is a blend of mutual aid, local contractors, and foreign contract crews that are used depending on the situation. See, also, response to Staff 1-86.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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;
- 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:

Not applicable. URECC did not use mutual aid assistance during Hurricane Beryl.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

URECC both provides and receives mutual aid assistance on an as needed basis.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Not applicable.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Not applicable.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Not applicable.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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

Response:

Not applicable.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

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:

Not applicable.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- **Staff 1-98** Please provide details regarding the lease or procurement of each mobile generation facility in the Transmission and Distribution Utility's (TDU) control, including:
 - a. Details regarding the competitive bidding process used or the justification for not using a competitive bidding process;
 - b. The size of each mobile generation facility in megawatts (MW);
 - c. The initial lease or procurement date of each facility;
 - d. The lease term, in months, of each mobile generation facility;
 - e. The expiration date of each facility's lease;
 - f. The to-date costs associated with each mobile generation facility, including operating, leasing costs, or other capital expense;
 - g. The expected costs associated with each lease, including operation and leasing costs; and
 - h. The expected return on investment associated with each lease or procurement.

Response:

URECC does not participate in mobile generation and the following questions do not apply to URECC.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- **Staff 1-99** Please provide details regarding mobile generation or temporary emergency electric energy facilities (TEEEF):
 - a. The control number of the TDU's most recently approved mobile generation or TEEEF cost recovery;
 - Details regarding whether the mobile generation or TEEEF cost recovery was processed as part of a larger Distribution Cost Recovery Factor proceeding or in a separate contested case;
 - c. The revenue requirement associated with the TDU's mobile generation or TEEEF expenses, broken out by rate class; and
 - d. The in-force tariffs associated with the TDU's mobile generation or TEEEF rider, broken out by rate class.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-100 Please provide the following information concerning your customer base:

- a. Total number of customers served by rate class;
- b. Average demand by rate class;
- c. Peak demand by rate class; and
- d. Net peak demand by rate class.

Response:

Does not apply.

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

OF TEXAS

UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-101 Please provide information on the average customer density by circuit mile for the feeders in the Impacted Area.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-102 Please provide an explanation of any alternative to mobile generation facilities considered by the TDU before entering a lease for or procuring mobile generation facilities.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-103 Please describe the specific use of cases contemplated by the TDU before executing a contract for the lease of procurement of mobile generation facilities.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- Staff 1-104 Please provide the following information concerning mobile generation facilities in your possession:
 - a. The total capacity, in MWs, of mobile generation facilities leased or procured before July 8, 2024
 - b. The rationale for leasing or procuring that capacity; and
 - c. And how mobility and capacity were prioritized when leasing or procuring mobile generation facilities.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- Staff 1-105 Please the following information for mobile generation facilities already under lease or procured before July 8, 2024:
 - a. The size, in MWs, of each deployed mobile generation facility,
 - b. The length of time needed to move each deployed mobile generation facility from storage to its designated staging area;
 - c. the length of time needed to move each mobile generation facility from staging to its deployment location;
 - d. An explanation for how and where the mobile generation facility was used; and
 - e. If a mobile generation facility was not used, an explanation as to why.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-106 Please describe all situations in which the TDU's leased or procured mobile generation facilities were deployed before Hurricane Beryl. If applicable, please describe how those precious deployment situations differed from the use cases initially contemplated by the TDU.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-107 Please provide the following information on power restoration plans or procedures regarding critical infrastructure facilities.

- a. Did the TDU develop a list of critical infrastructure facilities within the TDU's service territory?
- b. Did the TDU develop emergency preparedness plans in collaboration with critical infrastructure facilities in its service territory?
- c. Did the TDU develop a list of routes for use in reaching critical infrastructure facilities during an emergency or significant power outage?
- d. Did the TDU identify the specific steps it would take to energize critical infrastructure facilities in its service territory with mobile generation facilities?
- e. Did the TDU pre-position mobile generation facilities at critical infrastructure facilities in its service territory to respond to significant power outages in a timely manner?

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

- Staff 1-108 Please provide the following information regarding drills, procedures, and plans to use mobile generation facilities:
 - a. Did the TDU develop operating plans or procedures for the deployment of mobile generation? If so, please describe the TDU's strategy for deploying its mobile generation.
 - b. Did the TDU assign specific personnel to manage, either directly or indirectly, the operation and deployment of its mobile generation facilities?
 - c. Did the TDU conduct personnel trainings or preparedness drills for the operation of its mobile generation facilities?
 - d. Please describe any plans or procedures developed in coordination with other TDU's or mutual assistance groups for the operation or deployment of mobile generation.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-109 Please provide the following information regarding each mobile generation facility borrowed during Hurricane Beryl as part of a mutual assistance program or agreement.

- a. How the original request for mobile generation facilities through mutual assistance was made;
- b. The size, in MW, of each borrowed mobile generation facility;
- c. The date mutual assistance program or agreement was entered;
- d. The date the borrowed mobile generation facility was deployed;
- e. The duration, in hours, of the borrowing agreement. Describe whether this duration was for a fixed number of hours or a specific number of operating hours;
- f. The identity of the original owner or lessor of the mobile generation facility subject to the mutual assistance program or agreement; and
- g. Whether obtained mobile generation facilities were used during, or in power restoration efforts following, Hurricane Beryl.
 - i. If the mobile generation facility was not deployed, provide an explanation as to why the mobile generation facility was not deployed; and
 - ii. If the mobile generation facility was deployed, provide an explanation of how it was used.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-110 When mobile generation facilities are offered to other TDU's during significant power outages, what information does the loaning TDU require from the borrowing TDU related to the probable operation of the mobile generation?

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-111 Please describe if any mobile generation facilities in the TDU's control were deployed in the service territories of municipally owned utilities or electric cooperatives during Hurricane Beryl.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-112 Please describe how the determination was made regarding when and where to deploy or redeploy each mobile generation facility during, or in response to Hurricane Beryl.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-113 Please describe the number of distribution customer that had power restored by each mobile generation facility leased or procured by the TDU during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-114 Please describe the number of distribution customers that had power restored by each mobile generation facility obtained through mutual assistance during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-115 Please describe the number of transmission customers that had power restored by a mobile generation facility leased or processed by the TDU during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-116 Please describe the number of transmission customers that had power restored by a mobile generation facility obtained through mutual assistance during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-117 If applicable, pleas note if any fueling problems arose with deployed mobile generation facilities during, or in response to, Hurricane Beryl. If so, please describe the fueling problems in detail and any action that the TDU took in response.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-118 Please describe all costs incurred by the TDU that were associated with the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-119 Please describe any obstacle that limited the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

Response:

Does not apply.

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UPSHUR RURAL ELECTRIC COOPERATIVE CORPORATION RESPONSES TO COMMISSION STAFF'S FIRST SET OF REQUESTS FOR INFORMATION

Staff 1-120 Please describe any procedural improvements that the TDU intends to make prior to the next deployment of mobile generation facilities. If available, please reference specific sections of any after action report or lessons learned document the TDU has created.

Response:

Does not apply.