



Filing Receipt

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Control Number - 56822

Item Number - 164

MUTUAL AID AGREEMENT

In consideration of the mutual commitments given herein, each of the Signatories to this Mutual Aid Agreement agrees to render aid to any of the other Signatories as follows:

- 1.) Request for aid. The Requesting Signatory agrees to make its request in writing to the Aiding Signatory within a reasonable time after aid is needed and with reasonable specificity. The Requesting Signatory agrees to compensate the Aiding Signatory as specified in this Agreement and in other agreements that may be in effect between the Requesting and Aiding Signatories.
- 2.) Discretionary rendering of aid. Rendering of aid is entirely at the discretion of the Aiding Signatory. The agreement to render aid is expressly not contingent upon a declaration of a major disaster or emergency by the federal government or upon receiving federal funds.
- 3.) Invoice to the Requesting Signatory. Within 90 days of the return to the home work station of all labor and equipment of the Aiding Signatory, the Aiding Signatory shall submit to the Requesting Signatory an invoice of all charges related to the aid provided pursuant to this Agreement. The invoice shall contain only charges related to the aid provided pursuant to this Agreement.
- 4.) Charges to the Requesting Signatory. Charges to the Requesting Signatory from the Aiding Signatory shall be as follows:
 - a.) Labor force. Charges for labor force shall be in accordance with the Aiding Signatory's standard practices.
 - b.) Equipment. Charges for equipment, such as bucket trucks, digger derricks, and other special equipment used by the Aiding Signatory, shall be at the reasonable and customary rates for such equipment in the Aiding Signatory's location.
 - c.) Transportation. The Aiding Signatory shall transport needed personnel and equipment by reasonable and customary means and shall charge reasonable and customary rates for such transportation.
 - d.) Meals, lodging and other related expenses. Charges for meals, lodging and other expenses related to the provision of aid pursuant to this Agreement shall be the reasonable and actual costs incurred by the Aiding Signatory.
- 5.) Counterparts. The Signatories may execute this Mutual Aid Agreement in one or more counterparts, with each counterpart being deemed an original Agreement, but with all counterparts being considered one Agreement.
- 6.) Execution. Each party hereto has read, agreed to and executed this Mutual Aid Agreement on the date indicated.

Date: June 1, 2023

Entity: Brownsville Public Utilities Board

By: Marilyn D. Gilbert
Marilyn D. Gilbert, MBA

Title: General Manager & CEO

Please send signed agreement to:

American Public Power Association
ATTN: APPA Mutual Aid Team
2451 Crystal Drive, Suite 1000 | Arlington, VA 22202-4804
Email: MutualAid@PublicPower.org | **Fax:** 202-467-2932

Questions about this agreement should be directed to APPA's Technical and Operations Services department at MutualAid@PublicPower.org or 202-467-2900.

PROJECT NO. 56822

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

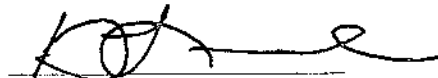
**BROWNSVILLE PUBLIC UTILITY BOARD'S RESPONSES TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TARGETED ELECTRIC MOUS**

To: John Lajzen, Public Utility Commission of Texas, 1701 N. Congress Ave., Austin, Texas
78711 (via Interchange filing)

The Brownsville Public Utilities Board, an agency of City of Brownsville, Texas (BPUB), files these responses to the referenced requests for information, Question Nos. Staff 1-1 through 1-120 (Staff RFIs). Pursuant to an agreement with PUC Staff, these responses are due on September 6, 2024. Because this is filed on the PUC Interchange, no individual service copies are being distributed. BPUB stipulates that its responses may be treated by all parties as if they were filed under oath. BPUB reserves the right to supplement its responses as may be necessary.

Dated: September 6, 2024

Respectfully submitted,



Gustavo Leal

PROJECT NO. 56822

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

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TARGETED ELECTRIC MOUS
QUESTION NOS. STAFF 1-1 THROUGH 1-120**

STAFF RFI NO. 1-1.

Provide the following information concerning the last hurricane or major storm drill conducted in 2024:

- a. The date the drill was conducted;
- b. The category of hurricane drilled and any conditions (e.g., where the hurricane made landfall, date hurricane made landfall, status of infrastructure and vegetation management activities in affected area, aid received vs aid requested from mutual assistance programs, total number of customers in anticipated affected area) used in the drill;
- c. A description as to how the drill conducted in 2024 differed materially from the previous annual drill;
- d. The identity of all third-party vendors that assisted in either conducting or preparations for the 2024 hurricane drill;
- e. The identity of all other electric, water, sewer, or telecommunication utilities that were invited to participate in your 2024 hurricane drill and a description of their participation;
- f. The identity of all local government, trade associations, medical and eldercare facilities, community organizations, PGCs, and REPs that were invited to participate in your 2024 hurricane drill and a description of their participation;
- g. How performance during the 2024 hurricane drill was measured; and
- h. Any feed-back whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.

RESPONSE TO RFI NO. 1-1:

- a. The Brownsville Public Utilities Board (BPUB) conducted a hurricane drill on June 27th 2024 as part of the annual 16 Tex. Admin. Code § 25.53 (f).
- b. The drill consisted of a Cat 4 that made landfall approximately 345 miles south of Brownsville, Texas. The landfall date was 10/31/2024. 10,000 customers were

without power and 150 wire down locations were reported. Vegetation management was on standby through as transmission system was not affected.

- c. Previous year's drill included a severe-cold weather component.
- d. AARC Consultants, LLC were contracted by BPUB to assist and conduct the 2024 hurricane drill.
- e. The BPUB Water/Wastewater Divisions and Silas Ray Power Plant were active participates in the 2024 hurricane drill and are part of the Incident Command System (ICS) structure.
- f. Texas Department of Emergency Management (TDEM) and the City of Brownsville participated as observers.
- g. Contractor (AARC Consultants, LLC) evaluates performance and produced an after-action report along with sections of what went well and why, what and how we can improve, along with conclusion and action plan.
- h. As mentioned in the previous response, the third-party contractor provided feedback as part of an after-action report.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-2:

Yes. The City of Brownsville, the owner and significant customer, was invited and participated as an observer.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-3:

The Brownsville area has not had a hurricane make landfall as a direct hit since 2008. However, the effects of a hurricane will cause flooding, high winds, and service interruptions which have all been conditions included in the drill.

- a. No date set.
- b. Hurricane Dolly has been the closest to a direct impact that has set the baseline for our emergency preparedness drills.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-4:

None.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal & Estrella Solorzano

STAFF RFI NO. 1-5.

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

RESPONSE TO RFI NO. 1-5:

The BPUB Energy Control Center receives adverse weather notifications from the local Brownsville/RGV National Weather Service center and ERCOT which also provides Bulk Electric System conditions. The Energy Control Center Operators also monitors 24/7 weather conditions from the Weather Channel and various meteorological websites. The adverse weather information is broadcasted via email and text message to all BPUB employees.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano, Eduardo Martinez & Robert Avila

STAFF RFI NO. 1-6.

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

RESPONSE TO RFI NO. 1-6:

The BPUB tracks all storm developments from the Atlantic Ocean, Caribbean Sea, and Gulf of Mexico up to 7 days or more.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 1-7.

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

RESPONSE TO RFI NO. 1-7:

BPUB formally started tracking 6 days before landfall, but was monitoring tropical disturbance before then.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano, Eduardo Martinez & Robert Avila

STAFF RFI NO. 1-8.

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

RESPONSE TO RFI NO. 1-8:

No, BPUB does not yet have an “outage tracker” available to its customers.

Prepared by: Gustavo C. Leal

Sponsored by: Ruben Cano, Eddy E. Hernandez and Ruben Cano

STAFF RFI NO. 1-9.

How far in advance of landfall did you initiate requests for mutual assistance?

RESPONSE TO RFI NO. 1-9:

The BPUB was not impacted by Hurricane Beryl, therefore no requests for mutual assistance were made.

Prepared by: Gustavo C. Leal

Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-10:

BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-11:

The BPUB Liaison Officer reports directly to the Command Post and when complaints are received, the BPUB Liaison Officer reports such complaint(s) to the Incident Commander.

Customer Service Staff takes inbound calls from customers during emergencies. Complaints are addressed as they are received and Section Chief is notified if needed. For complaints involving service restoration, a service request is submitted and routed to appropriate department.

In terms of Security Operations, BPUB security personnel will provide support to maintain order and secure BPUB facilities and all other premises under the control of the BPUB. BPUB Security personnel will contact Law Enforcement as needed.

During an emergency, BPUB employs several different methods to communicate with customers and the media. Press releases are frequently employed to directly communicate key messages to media partners, including representatives from TV, newspapers, magazines, radio, state politicians and local representatives. BPUB often follows up by phone or email to confirm key media outlets received the message. In addition, BPUB utilizes social media and its website to push out important information. Two digital billboards that BPUB currently has on contract can also be employed when needed. When possible, BPUB will also employ a mass communication platform to send a text or phone message to a targeted area.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Eddy Campirano, Ryan Greenfield, Nancy Tello, & Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-12:

Yes. The BPUB ESO continuously monitors the weather conditions utilizing news media and internet websites to prepare for cold/extreme cold and extreme hot weather accordingly. Reliability impacts resulting from cold/extreme cold and extreme hot weather conditions can vary depending on the severity of the event, and may include instability, uncontrolled separation, or cascading outages.

ERCOT may also issue emergency operations communications in the form of Operating Condition Notices (OCNs), Advance Action Notices (AANs), Advisories, Watches and Emergency Notices. These communications may relate to but are not limited to, weather, transmission, computer failure, or generation information as stated in the ERCOT Nodal Guides Section 4: Emergency Operation. The BPUB ESO will follow those Guides and any Operating Instructions issued by ERCOT.

For more details, see section 12 of the 2024 BPUB EOP.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal

STAFF RFI NO. 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 TO RFI NO. 1-13:

The BPUB uses the General Emergency Plan and the NIMS National Incident Management framework as its main tools for the management of all emergency incidents. This General Emergency Plan (GEP) aligns with and incorporates the BPUB General Plan for Emergency, and it supports the BPUB's intent to respond to any emergency situation in a safe, effective, and timely manner. BPUB maintains the GEP in anticipation of natural disasters or emergency situations involving denial or major interruptions in electrical service. The GEP sets forth organization commitments, personnel assignments, describes emergency communications procedures, and lists emergency contacts and vendors. This GEP supersedes any prior BPUB GEP.

The purpose of the GEP is to provide BPUB management and personnel with the tools and framework needed to manage an emergency event or situation and addresses both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies.

BPUB maintains this GEP in anticipation of natural disasters or situations involving denial or major interruptions in electrical service. The GEP sets forth organizational and personnel assignments, describes emergency communications procedures, and lists emergency contacts. As emergencies are often sudden and without warning, these procedures, while providing guidance, are designed to be flexible in order to permit the BPUB staff to respond to any given situation.

The GEP is maintained by the NERC Compliance Manager and Risk Manager. These staff are also authorized to make changes and/or revisions to the GEP.

The GEP aligns with ERCOT procedures for shedding load on a rotating schedule and identifies priorities for restoration of service. The GEP also includes sections that will ensure that BPUB

personnel understand what to do in advance of a predictable emergency and how key roles and responsibilities will be assigned and performed during emergency events and situations. The GEP provides guidelines for the BPUB to follow in order to share information efficiently and provide access to critical business and operational information with neighboring utilities, BPUB members, and the community.

Specifically, this plan was developed to:

- Provide the structure and processes to guide the organization during emergency conditions and situations.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively using BPUB's human and physical resources, and if necessary, by securing and using outside resources.
- Enable BPUB, neighboring utilities, and the community to share information efficiently and provide access to information critical to business and operations.
- Ensure that BPUB compliance with the regulatory requirements related to emergency operations and response.

As in the past, when any emergency has disrupted service to customers, the established lines of authority and responsibility will be followed as far as possible. However, in the event of major emergency, the General Manager may order such reassignment of duties as considered expedient under the circumstances. When a major emergency or disaster exists, the first function of BPUB personnel will be to assess the damages, then clear all hazards resulting from damage to the respective system. The second function will be to restore service to vital community services and installations. The following list is a guideline for the order of restoration of services:

1. City Storm Pumps
2. Lift Stations and Treatment Plants
3. Water Pumping Plants and Stations
4. Red Cross Shelters
5. Hospitals and Nursing Homes
6. Communications Centers
7. Food Centers and Storage Facilities
8. FAA Navigational Facilities
9. Other institutions whose functions are essential to the health and welfare of the community.
10. The next function will be to restore service to all remaining customers as quickly as possible.

The duties and responsibilities of Departmental Directors, Managers and Employees under their direction are identified in the following pages of this document and specifically in Section 11 – Emergency Staffing Plan.

This is an update of the GEP prepared by BPUB for submission to PUCT, therefore supersedes the March 14, 2024 GEP. It aggregates and summarizes pertinent components of existing BPUB

plans and policies as cited herein. This GEP does not supersede these reference documents, but relies upon their updates during the administrative cycle of review and revision. Additionally, The GEP sets guidelines for prepositioned contracts i.e. mutual aid agreements assigned to the staging area manager.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Eduardo Martinez, Lina Alvarez, & Diana Solitaire

STAFF RFI NO. 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 TO RFI NO. 1-14:

BPUB was not impacted by Derecho or Hurricane Beryl, therefore no preparations were made in advance of May 2024 and the GEM was not activated.

In regards to Hurricane Beryl, the Incident Commander (Mark Dombroski) sent an email on 7/3/2024 instructing BPUB personnel the following: "Please review your roles and responsibilities within the Plan, go through your Action Summaries, and prepare as much as possible today. Our current plan is to continue to prepare. We will meet at 1:30 p.m. on Saturday to determine if and when we will activate the Emergency Operations Center."

For relevant citations see 2024 BPUB EOP Section 2 page 17.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 1-15.

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

RESPONSE TO RFI NO. 1-15:

BPUB was not impacted by Derecho or Hurricane Beryl.

Due to the uncertain trajectory of Hurricane Beryl, the BPUB began preparations on 7/3/2024 by execution of action summary duties. (EOP Section 11)

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-16:

N/A, BPUB was not affected by Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal, Ruben Cano & Robert Avila

STAFF RFI NO. 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 TO RFI NO. 1-17:

- a. N/A, BPUB was not affected by Derecho or Hurricane Beryl.
- b. N/A, BPUB was not affected by Derecho or Hurricane Beryl.
- c. N/A, BPUB was not affected by Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal and Ruben Cano

STAFF RFI NO. 1-18.

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

RESPONSE TO RFI NO. 1-18:

N/A, BPUB was not affected by Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-19:

N/A, BPUB was not affected by Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 1-20.

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

RESPONSE TO RFI NO. 1-20:

NA, BPUB was not impacted by Derecho and Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal

STAFF RFI NO. 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 TO RFI NO. 1-21:

- a. Local government officials, with representatives across all levels, including city, county, state and school district, are included in BPUB's media list. That means they receive all press releases that are sent out. BPUB also has liaisons that work closely with the city and county to relay information. The BPUB Liaison Officers at BPUB are the primary point of contact during and after a hurricane or major storm in our service territory and if the General Emergency Plan is activated. The BPUB has a Voice Over Internet Protocol (VOIP) system established which is designated as the primary voice interpersonal communication capability that allows continued communications between BPUB and ERCOT, neighboring Transmission Operators, electric, water sewer and telecommunications utilities. A radio system is also in place and will be used for communications internally with BPUB electric, water and sewer personnel and externally with Rio Grande Valley law enforcement/emergency responders. Additionally, BPUB also has Off-Premises Exchange (OPX), satellite, mobile phones available for continued voice communications with said entities. Electric, water, sewer and telecommunications utilities in the BPUB area are given direct telephone contact numbers with which they can communicate with BPUB during/after a hurricane or major storm in the BPUB service territory.
- b. Augmenting call center staff with additional staff from other departments is a significant part of BPUB's emergency plan. During times of emergency, the Customer Service, Cashiering, Billing, Collections, Accounting, and Finance Departments are activated to assist the Call Center. This grows our Call Center from 11 Full-time Employees (FTE) to almost 50 FTEs.
- c. N/A, BPUB is a Municipally Owned Utility (MOU) and a Non-Opt-In Entity (NOIE).

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano, Ryan Greenfield & Miguel Collis

STAFF RFI NO. 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 TO RFI NO. 1-22:

Because Derecho was never expected to impact BPUB's service territory, there were no communications sent to customers about this storm; however, BPUB does post general awareness posts and tips throughout hurricane season. In regards to Beryl, BPUB communicated several times to the public through its social media channels on the trajectory of Beryl. A press release was issued July 3 that included how the BPUB was preparing and tips for the public. The last of these posts was July 5, and then Beryl changed trajectory away from BPUB's service territory.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano, Ryan Greenfield & Miguel Collis

STAFF RFI NO. 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 TO RFI NO. 1-23:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano, Eddy Campirano & Ryan Greenfield

STAFF RFI NO. 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 TO RFI NO. 1-24:

BPUB staff participates in State and County situational awareness calls. In county calls, local governments, community organizations, school districts, utilities, etc. discuss preparedness, needs, and collaboration. In the event of activation of EOP, BPUB Liaison relocates to city's EOC. BPUB

Liaison Officer reports directly to the Command Post and advises on road conditions, restoration efforts, outage reports, etc.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Ryan Greenfield & Miguel Collis

STAFF RFI NO. 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 TO RFI NO. 1-25:

BPUB and other utilities participate in State and County situational awareness calls with other community organizations, local governments, etc. to discuss preparedness, needs and collaboration.

One step taken by BPUB to better communications was the implementation of the Government Emergency Telecommunications Service (GETS) communication system that provides priority communications service in an emergency, and management is actively working on mutual aid and service agreements. In addition, the BPUB monitors all telecommunications devices and tests the primary and backup communications devices on a routine basis for operability. Additionally, The BPUB will notify any impacted entities of the detection of failure of its interpersonal communication capability and determine a mutually agreeable action for the restoration of its interpersonal communication capability.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Ryan Greenfield & Miguel Collis

STAFF RFI NO. 1-26.

Provide the following information concerning call centers and help desks used by your company before July 8, 2024:

- a. How many people work in call centers or help desks?
- b. Of these people, please provide the percentage of these employees that are full-time employees (FTE), contracted labor, or temporary/seasonal workers.
- c. What is the target wait time or response time for calls?
- d. What is the target resolution time for calls?
- e. Provide a detailed description of company-specific training provided to call center and help desk operators concerning major outages and major weather events including, but not limited to, hurricanes and high wind events.

- f. What is the maximum call volume for the call centers of help desks that were available and in operation during or in the aftermath of Hurricane Beryl?

RESPONSE TO RFI NO. 1-26:

- a. There are 11 full-time Call Center Employees. During times of emergency, other departments are activated to assist with call volume. During times of emergency BPUB has approximately 50 employees to assist with call volume.
- b. All employees are FTEs. BPUB does not currently utilize third-party, temp or contract labor for call center services.
- c. BPUB has not established a metric for wait times during time of emergency.
- d. Target resolution time for calls regarding outages is less than 3 minutes.
- e. All call center operators are full-time BPUB employees that undergo a 6–8-week hands-on training program that includes all company specific call center software, call handling, and outage reporting.
- f. N/A

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Eddy Campirano

STAFF RFI NO. 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 TO RFI NO. 1-27:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Eddy Campirano

STAFF RFI NO. 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 TO RFI NO. 1-28:

BPUB's messaging leading up to Beryl mainly focused on tracking the trajectory of the storm. These posts were on BPUB's social media accounts. BPUB participated in situational calls that included local, county, regional, and state representatives to keep them aware of any updates involving BPUB. In addition, BPUB provided general preparation tips via social media, BPUB website and press release. Since Beryl ended up not threatening BPUB's service territory, no information on recovery resources was needed.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Ryan Greenfield & Miguel Collis

STAFF RFI NO. 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 TO RFI NO. 1-29:

Incoming calls from customers to our call center are recorded and retained for 6 months.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Eddy Campirano

STAFF RFI NO. 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 TO RFI NO. 1-30:

N/A, see response to 1-29; also, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Eddy Campirano

STAFF RFI NO. 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 TO RFI NO. 1-31:

No messages by BPUB related to Derecho.

Pre-recorded messages were utilized from 6/18/2024 to 7/10/2024. Audio Copy is not available.

Transcript:

English: BPUB is keeping a close eye on the weather in our area. If your service is interrupted, please report it online at assist.brownsville-pub.com or by calling 956-983-6300.

Spanish: BPUB está monitoreando de cerca el clima en nuestra área. Si experimenta una interrupción de servicio, por favor repórtelo en línea en assist.brownsville-pub.com o llamando al 956-983-6300.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Eddy Campirano

STAFF RFI NO. 1-32.

Provide the following information concerning the outage tracker in use on July 8, 2024:

- a. The date the outage tracker was rolled out to customers.
- b. The last date the software underpinning the outage tracker was updated.
- c. whether the outage tracker was functioning during the May 2024 Derecho and Hurricane Beryl as intended or provide an explanation as to why not.
- d. Whether the outage tracker was mobile-friendly;
- e. the languages supported by the outage tracker;
- f. Whether the outage tracker captured circuit-specific or meter-specific information or both.
- g. Whether the outage tracker was cloud-based or operated through an on-premise server?
- h. The maximum number of simultaneous users the outage tracker was designed to accommodate.

- i. Whether you had internal facing redundancies/contingencies for outage tracking, and if so if these redundancies/contingencies were utilized during your response to Hurricane Beryl.
- j. The date of the last stress or load test of the outage tracker.

RESPONSE TO RFI NO. 1-32:

BPUB had no outage tracker in use on July 8, 2024.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal and Ruben Cano

STAFF RFI NO. 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 TO RFI NO. 1-33:

N/A, BPUB does not have any customers in the greater Houston area.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal and Ruben Cano

STAFF RFI NO. 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 TO RFI NO. 1-34:

N/A, BPUB does not yet have an “outage tracker” available to its customers.

Prepared by: Gustavo C. Leal
Sponsored by: Gustavo C. Leal and Ruben Cano

STAFF RFI NO. 1-35.

Describe any processes or policies adopted by your company as contingencies to inform customers about service outages and estimated restoration times in the event the outage tracker is offline.

RESPONSE TO RFI NO. 1-35:

BPUB currently does not have an outage tracker in place-

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Ryan Greenfield

STAFF RFI NO. 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 TO RFI NO. 1-36:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano

STAFF RFI NO. 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 TO RFI NO. 1-37:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Gustavo C. Leal and Jaime Aguilar

STAFF RFI NO. 1-38.

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

RESPONSE TO RFI NO. 1-38:

N/A, BPUB was not impacted by Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-39:

The BPUB Key Accounts (KA) Department has a Service Interruption Process that is followed during these types of situations. In advance of a hurricane or major storm, the BPUB KA Department does contact local medical facilities and other Key Accounts customers. This communication occurs via email, phone, and text.

EOP Section 9.8 Communication with Critical Load Customers (pg. 34)

Protocols are established so that the Public Relations representatives in the EOC will notify critical customers periodically to advise of current emergency situations and expected time for restoration.

EOP Section 11 Emergency Staffing Plan – Actions Summary Customer Service and IT Division (pg. 78)

A Summary of Actions can be found under Prevention/Preparedness.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Danny Mares

STAFF RFI NO. 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 TO RFI NO. 1-40:

The BPUB Key Accounts Department contacted Key Accounts customers on July 3rd, prior to the landfall of Hurricane Beryl. This contact occurred via email and phone call.

Section EOC Plan Section 11 Emergency Staffing Plan – Actions Summary Customer Service and IT Division (pg.78)

Per aforementioned section, KA Department communicated via Email, Phone and Text. Communication began on July 3, 2024.

Ultimately, Hurricane Beryl did not impact the BPUB service area.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano, Evelyn Garcia & Danny Mares

STAFF RFI NO. 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 TO RFI NO. 1-41:

BPUB was not impacted by Hurricane Beryl, therefore no contact was made with critical care and at-risk customers.

Outage information is consistently provided to customers via social media and the BPUB website. The City of Brownsville Liaison will also communicate with BPUB Liaison for any Emergency need within the city.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Ryan Greenfield

STAFF RFI NO. 1-42.

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

RESPONSE TO RFI NO. 1-42:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Ryan Greenfield

STAFF RFI NO. 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 TO RFI NO. 1-43:

BPUB has a 2024 BPUB EOP already on file with the PUCT (EOP: Section 13.4 page 102).

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-44.

Please describe the procedures followed for customer restoration of service, including prioritization criteria and timelines for restoration or service. Please note if these policies may lead to quicker restoration of service for an area of your service territory relative to the others and why.

RESPONSE TO RFI NO. 1-44:

BPUB customer service restoration is based on outage size and priority customers.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-45:

N/A. BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-46:

N/A. BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-47:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-48:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-49:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-50:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-51:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-52:

Yes, NIMS has been in place since 2008.

Prepared by: Gustavo C. Leal
Sponsored by: Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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 TO RFI NO. 1-53:

Yes, all Emergency Response personnel have been trained in ICS.

Prepared by: Gustavo C. Leal

Sponsored by: Estrella Solorzano and Eduardo Martinez

STAFF RFI NO. 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;
- c. When you decide to replace the distribution pole.

RESPONSE TO RFI NO. 1-54:

- a. Evaluations are ongoing on a 7-year cycle
- b. Visual inspections and sound/bore tests. Wood poles are replaced with concrete poles.
- c. When they fail the visual inspections and sound/bore tests.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-55.

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

RESPONSE TO RFI NO. 1-55:

15 ft for 3-Ph Along Street
30 ft for 3-Ph Over Open Land
10 ft for 1-Ph Along Street
20 ft for 1-Ph Over Open Land

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-56:

N/A, BPUB was not affected by Hurricane Beryl or Derecho.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-57:

- a. N/A, BPUB does not have poles taller than 60-feet on its distribution system.
- b. N/A, BPUB was not impacted by May 2024 Derecho and Hurricane Beryl.

- c. N/A, BPUB does not have poles taller than 60-feet on its distribution system.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-58:

10% of pole height plus 2 feet safety factor. No change in the past 10 yrs.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-59:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-60.

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

RESPONSE TO RFI NO. 1-60:

Distribution lines were built to the relevant NESC wind loading criteria for that year of installation.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-61:

Adopted 2023 NESC wind loading criteria: Grade C, 50-year Mean Recurrence Interval (MRI) 3 s gust wind speed map in mph (m/s) at 33 ft (10 m) aboveground and light loading district.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-62:

N/A, BPUB was not affected by Hurricane Beryl or Derecho.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-63:

NESC wind loading Criteria: Distribution lines were built to the relevant NESC wind loading criteria for that year of installation.

Distribution wood pole: **15,569**

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-64:

N/A, BPUB was not impacted by May 2024 Derecho.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-65:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-66:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-67:

No comment at this time.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-68:

- a. About every 5 years.
- b. Visual inspections and sound/bore tests.
- c. When the wood pole fails the inspection and sound/bore tests. Wood poles are replaced with concrete poles.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-69:

NESC wind loading criteria: Transmission lines were built to the relevant NESC structural extreme wind and light loading region for that year of installation.

Transmission Wood Pole: **810**
Transmission Concrete Pole: **99**
Transmission Steel Pole: **18**

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-70:

N/A, BPUB was not impacted by May 2024 Derecho.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-71:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-72:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal

Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-73:

- a. Independent contractor staffed with 10 employees.
- b. Independent contractor staffed with 10 employees.

- c. Is based on the amount of service requests associated with vegetation management and inspections of electrical lines.
- d. N/A because BPUB only uses contractors.
- e. An arborist is included in our next vegetation management contract starting September 2024.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-74:

15 feet.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-75:

Yes

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-76.

Please provide inspection logs and field reports from workers who performed vegetation management services in the Impacted Area for the past five years.

RESPONSE TO RFI NO. 1-76:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-77:

BPUB vegetation management is conducted on an ongoing schedule and as needed.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-78:

- a. N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.
- b. N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.
- c. N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.
- d. N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.
- e. N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-79:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-80.

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

RESPONSE TO RFI NO. 1-80:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-81:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 1-82.

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

RESPONSE TO RFI NO. 1-82:

June 2024

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-83:

N/A, BPUB was not affected by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-84:

Trade the Tree program is a tree encroachment mitigation strategy that replaces invasive trees with local native trees planted outside the potential area of encroachment. This is provided at no cost to the customers.

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-85:

Three (3)

Prepared by: Gustavo C. Leal
Sponsored by: Cesar A. Cortinas Jr. and Eli Alvarez

STAFF RFI NO. 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;
- c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.

RESPONSE TO RFI NO. 1-86:

- a. BPUB participates on TPPA and TxMAG for Mutual Aid Assistance. The BPUB has entered several agreements to provide and receive mutual assistance. In both instances, the primary objective is to facilitate rapid, short-term deployment of emergency staff and equipment support.
- b. TPPA Mutual Aid Assistance and TxMAG supporting documents are attached.
- c. Attached are the TPPA and TxMAG member lists requested.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-87:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-88:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-89:

N/A, BPUB was not affected by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-90:

In preparation for Beryl, BPUB proactively contacted TxMAG and TPPA Mutual Aid Assistance staff to establish a communication channel in case support was needed.

The Staging Area Manager started coordinated with the Operations Section Chief available properties for staging personnel and possible MAA personnel, as well as feeding and parking areas. The STAM also coordinated with Logistics on available restaurant and hydration stations/options.

During and after Beryl, no actions were taken since BPUB was not affected by Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 1-91.

Provide the following information concerning mutual assistance received in response to either the May 2024 Derecho or Hurricane Beryl:

- a. Identify all mutual assistance programs from which you requested assistance;
- b. Describe the specific assistance, including but not limited to the number of damage assessors, vegetation management crews, linemen, 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 TO RFI NO. 1-91:

N/A, BPUB was not impacted by May 2024 Derecho or Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-92:

BPUB is able to accept or decline assistance and/or resources.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-93:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-94:

Not applicable. BPUB held meetings and WebEx with the ICS to monitor the forecast and discuss preparations before, during, and after Beryl.

BPUB also prepared an Emergency Operation Center in case it was going to be needed for the ICS; however, since the hurricane did not affect Brownsville, there was no need for other staging areas.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-95:

N/A, BPUB was not impacted by Hurricane Beryl.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 1-96.

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

RESPONSE TO RFI NO. 1-96:

The Staging Area Manager worked closely with the Operations Section Chief drafting plans for staging personnel sleeping quarters, hydration areas, feeding areas and parking resources. BPUB established an Emergency Operation Center to maintain the ICS personnel. However, since Brownsville was not directly affected; there was no need for additional Staging Areas.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-97:

No.

Prepared by: Gustavo C. Leal
Sponsored by: Lina L. Alvarez

STAFF RFI NO. 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 TO RFI NO. 1-98:

- a. Competitive bids were received for the rental of emergency generators for use during hurricane season.
- b. (2) 2 MW
(1) 0.550 MW
(3) 0.440 MW
(2) 1 MW
(2) 1.25 MW
- c. June 30, 2024
- d. 6 months
- e. November 30, 2024
- f. \$389,535.00

- g. \$755,220.00
- h. \$0

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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;
- b. 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 TO RFI NO. 1-99:

- a. N/A
- b. N/A
- c. N/A
- d. N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-100.

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 TO RFI NO. 1-100:

- a.

Rate Class	# of Customers	Consumption in KWH	Average Consumption in KWH
1. Residential	47,926	72,981,990	1522.81
2. GS/Non-Demand	5,270	15,729,900	2984.80
3. Municipal	578	6,841,858	11837.12
4. GS/Demand	677	51,158,909	75567.07
5. Vapor Lamp Only	168	95,585	568.96
Subtotal	54,619	146,808,242	

- b. See response for item a above.
- c. The BPUB does not have capabilities to calculate peak demand by rate class.
- d. The BPUB does not have capabilities to calculate net peak demand by rate class.

Prepared by: Gustavo C. Leal
 Sponsored by: Elias Quintero, Jr. and George Rangel

STAFF RFI NO. 1-101.

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

RESPONSE TO RFI NO. 1-101:

N/A

Prepared by: Gustavo C. Leal
 Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-102.

Please provide an explanation of any alternatives to mobile generation facilities considered by the TDU before entering a lease for or procuring mobile generation facilities.

RESPONSE TO RFI NO. 1-102:

Conducted a Cost vs Buy study for emergency generators in 2020.

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-103.

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

RESPONSE TO RFI NO. 1-103:

- Critical raw water pump station of one of our water treatment facilities.
- Critical water treatment facilities whose generators are under long term repair.
- Critical facilities for the City of Brownsville: flood control and data center.

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-104:

- a. 10,320 MW
- b. Each generator was sized according to the critical facility requirements.
- c. Procuring generators is prioritized based on criticality of the facility.

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-105.

Provide 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 TO RFI NO. 1-105:

a.

2024 Hurricane Emergency Generator Rentals				
Location	kw Rating	Rental Contract	Rental Period	Entity
1 BPUB Raw Water Pumps	550kW	6 months	June 1, 2024 - November 30, 2024	BPUB
2 El Tapiz	440kW	6 months	June 1, 2024 - November 30, 2024	City of Brownsville
3 Impala Pumps	2000kW	6 months	June 1, 2024 - November 30, 2024	City of Brownsville
4 Impala Pumps	2000kW	6 months	June 1, 2024 - November 30, 2024	City of Brownsville
5 Fruitdale	440kW	6 months	June 1, 2024 - November 30, 2024	Irrigation District
6 Morningside	440kW	6 months	June 1, 2024 - November 30, 2024	Irrigation District
7 BPUB Water Plant 1 HS-Pump	1000 KW & 2300VAC Transformer	1 year	June 1, 2024 - May 31, 2025	BPUB
8 BPUB Water Plant 1 Main	1250 KW	1 year	June 1, 2024 - May 31, 2025	BPUB
9 BPUB SRWA Micro Filtration	1000 KW	1 year	June 1, 2024 - May 31, 2025	BPUB
10 BPUB Filter Yard	1250 kW	1 year	June 1, 2024 - May 31, 2025	BPUB

- b. 0 hours
- c. moved straight from vendor to deployed location.
- d. Locations are listed above in the response for question “a” and generators are used as back-up power for that specific facility.
- e. All mobile generators were connected and ready to be used.

Prepared by: Gustavo C. Leal
 Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 previous deployment situations differed from the use cases initially contemplated by the TDU.

RESPONSE TO RFI NO. 1-106:

N/A – all mobile generators were deployed according to the use cases.

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-107:

- a. Yes
- b. Yes
- c. No
- d. Yes
- e. Yes

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TDUs 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 TDUs or mutual assistance groups for the operation or deployment of mobile generation.

RESPONSE TO RFI NO. 1-108:

- a. BPUB prepares months in advance by procuring rental mobile generation, and deploying and testing before hurricane season officially starts. All units are in place by the official beginning of hurricane season on June 1.
- b. Yes – the Electrical Support Services Department is responsible for the deployment and testing of all mobile generators.
- c. Yes. Preparedness drills are conducted each year before the beginning of hurricane season.
- d. No plans or procedures are developed in coordination with other TDUs or mutual assistance groups.

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 the 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 TO RFI NO. 1-109:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-110.

When mobile generation facilities are offered to other TDUs 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 TO RFI NO. 1-110:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-111:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-112:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-113.

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

RESPONSE TO RFI NO. 1-113:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-114:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-115.

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

RESPONSE TO RFI NO. 1-115:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-116:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-117.

If applicable, please 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 TO RFI NO. 1-117:

N/A

Prepared by: Gustavo C. Leal

Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-118:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 1-119.

Please describe any obstacles that limited the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

RESPONSE TO RFI NO. 1-119:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

STAFF RFI NO. 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 TO RFI NO. 1-120:

N/A

Prepared by: Gustavo C. Leal
Sponsored by: Elias Quintero, Jr. and Eddy E. Hernandez

**Edison Electric Institute
Mutual Assistance Agreement**


Edison Electric Institute (“EEI”) member companies have established and implemented an effective system whereby member companies may receive and provide assistance in the form of personnel and equipment to aid in restoring and/or maintaining electric utility service when such service has been disrupted by acts of the elements, equipment malfunctions, accidents, sabotage, or any other occurrence for which emergency assistance is deemed to be necessary or advisable (“Emergency Assistance”). This Mutual Assistance Agreement sets forth the terms and conditions to which the undersigned EEI member company (“Participating Company”) agrees to be bound on all occasions that it requests and receives (“Requesting Company”) or provides (“Responding Company”) Emergency Assistance from or to another Participating Company who has also signed the EEI Mutual Assistance Agreement; provided, however, that if a Requesting Company and one or more Responding Companies are parties to another mutual assistance agreement at the time of the Emergency Assistance is requested, such other mutual assistance agreement shall govern the Emergency Assistance among those Participating Companies.

In consideration of the foregoing, the Participating Company hereby agrees as follows:

1. When providing Emergency Assistance to or receiving Emergency Assistance from another Participating Company, the Participating Company will adhere to the written principles developed by EEI members to govern Emergency Assistance arrangements among member companies (“EEI Principles”), that are in effect as of the date of a specific request for Emergency Assistance, unless otherwise agreed to in writing by each Participating Company.
2. With respect to each Emergency Assistance event, Requesting Companies agree that they will reimburse Responding Companies for all costs and expenses incurred by Responding Companies in providing Emergency Assistance as provided under the EEI Principles, unless otherwise agreed to in writing by each Participating Company; provided, however, that Responding Companies must maintain auditable records in a manner consistent with the EEI Principles.
3. During each Emergency Assistance event, the conduct of the Requesting Companies and the Responding Companies shall be subject to the liability and indemnification provisions set forth in the EEI Principles.
4. A Participating Company may withdraw from this Agreement at any time. In such an event, the company should provide written notice to EEI’s Vice President of Security and Preparedness or his/her designee.

5. EEI's Senior Director of Preparedness and Recovery Policy or his/her designee who shall maintain a list of each Mutual Assistance Agreement Participating Company Signatory which shall be posted in the RestorePower Workroom as <https://eei-restorepower.groupsites.com/page/mutual-assistance-agreement> .

Company Name: Brownsville Public
Utilities Board



Signature

Officer Name: Marilyn D. Gilbert, MBA
Title: General Manager & CEO
Date: May 31, 2023

**SUGGESTED GOVERNING PRINCIPLES COVERING
EMERGENCY ASSISTANCE ARRANGEMENTS
BETWEEN EDISON ELECTRIC INSTITUTE MEMBER COMPANIES**

Electric companies have occasion to call upon other companies for emergency assistance in the form of personnel or equipment to aid in maintaining or restoring electric utility service when such service has been disrupted by acts of the elements, equipment malfunctions, accidents, sabotage or any other occurrences where the parties deem emergency assistance to be necessary or advisable. While it is acknowledged that a company is not under any obligation to furnish such emergency assistance, experience indicates that companies are willing to furnish such assistance when personnel or equipment are available.

In the absence of a continuing formal contract between a company requesting emergency assistance ("Requesting Company") and a company willing to furnish such assistance ("Responding Company"), the following principles are suggested as the basis for a contract governing emergency assistance to be established at the time such assistance is requested:

1. The emergency assistance period shall commence when personnel and/or equipment expenses are initially incurred by the Responding Company in response to the Requesting Company's needs. (This would include any request for the Responding Company to prepare its employees and/or equipment for transport to the Requesting Company's location but to await further instructions before departing). The emergency assistance period shall terminate when such employees and/or equipment have returned to the Responding Company, and shall include any mandated DOT rest time resulting from the assistance provided and reasonable time required to prepare the equipment for return to normal activities (e.g. cleaning off trucks, restocking minor materials, etc.).
2. To the extent possible, the companies should reach a mutual understanding and agreement in advance on the anticipated length – in general – of the emergency assistance period. For extended assistance periods, the companies should agree on the process for replacing or providing extra rest for the Responding Company's employees. It is understood and agreed that if, in the Responding Company's judgment such action becomes necessary the decision to terminate the assistance and recall employees, contractors, and equipment lies solely with the Responding Company. The Requesting Company will take the necessary action to return such employees, contractors, and equipment promptly.
3. Employees of Responding Company shall at all times during the emergency assistance period continue to be employees of Responding Company and shall not be deemed employees of Requesting Company for any purpose. Responding Company shall be an independent Contractor of Requesting Company and wages, hours and other terms and conditions of employment of Responding Company shall remain applicable to its employees during the emergency assistance period.
4. Responding Company shall make available upon request supervision in addition to crew leads. All instructions for work to be done by Responding Company's crews shall be given by

Requesting Company to Responding Company's supervision; or, when Responding Company's crews are to work in widely separate areas, to such of Responding Company's crew lead as may be designated for the purpose by Responding Company's supervision.

5. Unless otherwise agreed by the companies, Requesting Company shall be responsible for supplying and/or coordinating support functions such as lodging, meals, materials, etc. As an exception to this, the Responding Company shall normally be responsible for arranging lodging and meals en route to the Requesting Company and for the return trip home. The cost for these in transit expenses will be covered by the Requesting Company.
6. Responding Company's safety rules shall apply to all work done by their employees. Unless mutually agreed otherwise, the Requesting Company's switching and tagging rules should be followed to ensure consistent and safe operation. Any questions or concerns arising about any safety rules and/or procedures should be brought to the proper level of management for prompt resolution between management of the Requesting and Responding Companies.
7. All time sheets and work records pertaining to Responding Company's employees furnishing emergency assistance shall be kept by Responding Company.
8. Requesting Company shall indicate to Responding Company the type and size of trucks and other equipment desired as well as the number of job function of employees requested but the extent to which Responding Company makes available such equipment and employees shall be at Responding Company's sole discretion.
9. Requesting Company shall reimburse Responding Company for all costs and expenses incurred by Responding Company as a result of furnishing emergency assistance. Responding Company shall furnish documentation of expenses to Requesting Company. Such costs and expenses shall include, but not be limited to, the following:
 - a. Employees' wages and salaries for paid time spent in Requesting Company's service area and paid time during travel to and from such service area, plus Responding Company's standard payable additives to cover all employee benefits and allowances for vacation, sick leave and holiday pay and social and retirement benefits, all payroll taxes, workmen's compensation, employer's liability insurance and other contingencies and benefits imposed by applicable law or regulation.
 - b. Employee travel and living expenses (meals, lodging and reasonable incidentals).
 - c. Replacement cost of materials and supplies expended or furnished.
 - d. Repair or replacement cost of equipment damaged or lost.
 - e. Charges, at rates internally used by Responding Company, for the use of transportation equipment and other equipment requested.
 - f. Administrative and general costs, which are properly allocable to the emergency assistance to the extent such costs, are not chargeable pursuant to the foregoing subsections.
10. Requesting Company shall pay all costs and expenses of Responding Company within sixty days after receiving a final invoice therefor.

11. Requesting Company shall indemnify, hold harmless and defend the Responding Company from and against any and all liability for loss, damage, cost or expense which Responding Company may incur by reason of bodily injury, including death, to any person or persons or by reason of damage to or destruction of any property, including the loss of use thereof, which result from furnishing emergency assistance and whether or not due in whole or in part to any act, omission, or negligence of Responding Company except to the extent that such death or injury to person, or damage to property, is caused by the willful or wanton misconduct and / or gross negligence of the Responding Company. Where payments are made by the Responding Company under a workmen's compensation or disability benefits law or any similar law for bodily injury or death resulting from furnishing emergency assistance, Requesting Company shall reimburse the Responding Company for such payments, except to the extent that such bodily injury or death is caused by the willful or wanton misconduct and / or gross negligence of the Responding Company.

12. In the event any claim or demand is made or suit or action is filed against Responding Company alleging liability for which Requesting Company shall indemnify and hold harmless Responding Company under paragraph (11) above, Responding Company shall promptly notify Requesting Company thereof, and Requesting Company, at its sole cost and expense, shall settle, compromise or defend the same in such manner as it in its sole discretion deems necessary or prudent. Responding Company shall cooperate with Requesting Company's reasonable efforts to investigate, defend and settle the claim or lawsuit.

13. Non-affected companies should consider the release of contractors during restoration activities. The non-affected company shall supply the requesting companies with contact information of the contactors (this may be simply supplying the contractors name). The contractors will negotiate directly with requesting companies.

Date	Description
October 2014	Sections 4, 5, and 10
September 2005	Sections 11 and 12