



Filing Receipt

Filing Date - 2024-09-27 03:34:51 PM

Control Number - 56822

Item Number - 191

PROJECT NO. 56822

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

ENCHANTED ROCK, LLC'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO POWER GENERATION COMPANIES

Enchanted Rock, LLC (Enchanted Rock), on behalf of its power generation company (PGC) subsidiaries, provides the following responses to Staff's First Request for Information to Power Generation Companies related to the May 2024 Derecho event and Hurricane Beryl. Enchanted Rock appreciates the opportunity to provide information and feedback regarding its experiences during both events and its recommendations for improvements going forward.

I. RESPONSES TO STAFF REQUESTS FOR INFORMATION

PGC 1-1 Please provide the company name, contact information, PGC registration number associated with the PGC responding to this request.

Response: Enchanted Rock provides responses to the Requests for Information (RFIs) below for the following PGCs: Texas Microgrid (20493), Texas Microgrid II (20716), ER-NG (20527), Power Depot (20651), Enchanted Rock Operations (20748). If the Staff has any follow-up questions related to the responses provided below, please contact Joel Yu, Vice President of Policy: 1113 Vine St, Suite 101 Houston, TX 77002, jyu@enchantedrock.com.

PGC 1-2 Please provide a list of generation facilities in Impacted Area, including their fuel type (e.g., natural gas, coal, wind, solar), county location, and generation capacity, expressed as the summer net seasonal maximum capacity in megawatts of each resource in the facility.

Response: See the attached table for the list of Enchanted Rock's PGC's generation facilities in the Impacted Area.



ENCHANTED ROCK
The Power is On.

PGC 1-3 Were any of the PGC's generation facilities forced offline or derated due to an outage on the transmission or distribution systems? If yes, please provide the total amount of megawatts forced offline or derated due to these outages.

Response: Enchanted Rock's generation facilities are able to fully island from the utility grid, therefore the vast majority of sites were not impacted by outages on the transmission or distribution system during either Derecho or Hurricane Beryl. However, around 40 MW of Enchanted Rock's diesel sites were affected due to offline transmission and distribution utility equipment. Since those sites are not colocated with load for backup power service and were not receiving service from the substation, they could not be operated for ERCOT grid support from July 8th to July 12th. While Enchanted Rock's natural gas generation sites faced similar utility outages, they remained online to provide critical facility backup power. The utility's underground gas delivery system remained reliable throughout the storm to keep our gas sites online.

PGC 1-4 Please provide a timeline of the PGC's response to the May 2024 Derecho and Hurricane Beryl, including the onset and duration of any outages, and the steps taken to restore operations.

Response: For the few diesel sites, Enchanted Rock could not take any steps to restore service directly, as the equipment was reliant on the offline substation for its export path back to ERCOT. Those sites were back online once utility service was restored on July 12th. Enchanted Rock's natural gas generation facilities remained operational with exceptional availability throughout both storms. Enchanted Rock was able to provide over 7,800 hours of outage coverage statewide, with 96% of Houston sites providing reliable power during Hurricane Beryl. The average site covered 52+ hours, and 6 sites were able to cover over 150 hours (over 6 days) of outages each. The high availability of Enchanted Rock systems during the storms demonstrates the robustness of our infrastructure and planning.

PGC 1-5 Please provide a description of any communications with ERCOT or the PGC's interconnecting transmission and distribution utility regarding the PGC's status during the storms.

Response: Communications with ERCOT were standard and proceeded without any issues. Enchanted Rock's experience with the transmission and distribution utility was consistent with broader reports of communication slowdowns during the severe weather event. Our internal communication with customers was robust. We provided real-time updates through our monitoring systems, ensuring that customers received specific, timely information about the



ENCHANTED ROCK
The Power is On.

status of their microgrids. This high-volume communication allowed us to address concerns quickly and maintain strong customer trust throughout the storm.

PGC 1-6 Please provide a description of the PGC's communications and coordination with ERCOT, the PGC's interconnecting transmission and distribution utility, and other stakeholders during and in the aftermath of the May 2024 Derecho and Hurricane Beryl.

Response: See response to PGC 1-5.

PGC 1-7 Please provide an assessment of the effectiveness of the communications and coordination addressed in PGC 1-6 and any recommendations for improvement.

Response: Enchanted Rock's communication with ERCOT remained routine and effective. While post-storm coordination with the transmission and distribution utilities could be improved in terms of timeliness and content, Enchanted Rock is not well-positioned to make specific recommendations to the utilities on how to make those improvements.

PGC 1-8 Please provide a description of any challenges in restoring operations that you encountered due to the May 2024 Derecho and Hurricane Beryl.

Response: The primary challenge Enchanted Rock faced during the storms was delayed restoration of service to the diesel sites due to transmission and distribution utility equipment outages. The cause of the outage remains unknown. Nevertheless, the resilience of Enchanted Rock's natural gas sites during these events, supported by the utility's underground gas network, allowed us to maintain operations where it was most critical.

PGC 1-9 Please provide any recommendations for improving the resiliency of the bulk power system during events such as the May 2024 Derecho or Hurricane Beryl in the future.

Response: Increased coordination between transmission and distribution utilities and PGCs will play a key role in enhancing grid resilience. For example, with appropriate hardening and sectionalizing investments, the utilities could facilitate faster restoration via facilitation of third-party microgrid assets, reducing downtime for customers during severe weather events. In many cases, Enchanted Rock microgrid assets have spare capacity that could be leveraged to support surrounding customers during outage conditions. Broader deployment of distributed generation, in general, would bolster the grid's ability to handle disruptions.



ENCHANTED ROCK
The Power is On.

PGC 1-10 Please provide any additional information that may be helpful to this investigation.

Response: Enchanted Rock does not have any further information to provide at this time.

II. CONCLUSION

Enchanted Rock commends the Commission and Staff's efforts to holistically review and identify lessons learned from the experiences of different stakeholders (including PGCs) during the May 2024 Derecho storm and Hurricane Beryl. Enchanted Rock appreciates the opportunity to participate in this process and looks forward to working with the Commission and Staff to continue to improve the industry's response to the next storm.

Respectfully submitted,

/s/ Joel Yu

Joel Yu

VP of Policy

Enchanted Rock, LLC.

jyu@enchantedrock.com



ENCHANTED ROCK
The Power is On.

1113 Vine St, Suite 101 | Houston, TX 77002
713.429.4091
enchantedrock.com

Fuel Type	Full Store Name	Site County	No. of Gens	System KW
Diesel	Clara (Addicks)	Harris	15	8025
Diesel	Stonegate (Katy)	Fort Bend	15	8025
Diesel	E. Porte Ct. (E. Harrison)	Cameron	15	8025
Diesel	Vaquero (Haine)	Cameron	15	8025
Diesel	FM 1732 (Villa Cavazos)	Cameron	15	8025
Diesel	GCWA IPS	Galveston	8	4520
Diesel	Ridge Rd. (El Gato)	Hidalgo	15	8025
Diesel	FM 2221 (Citrus City)	Hidalgo	15	8025
Diesel	Cutten (TH Wharton)	Harris	15	8025
Diesel	FM 506 (S. Santa Rosa)	Cameron	15	8025
Diesel	288 (Southwick)	Harris	15	8025
Diesel	GCWA Muni	Galveston	4	2260
Natural Gas	HEB CPSSADistCenter	Bexar	16	6400
Natural Gas	HEBHOUDistCenter_1	Harris	20	8000
Natural Gas	HEBHOUDistCenter_2	Harris	12	4800
Natural Gas	HEBTEMDistCenter	Bell	12	4800
Natural Gas	OTHERBenEKDallas	Dallas	4	1600
Natural Gas	OTHERCFAHU	Dallas	15	6000
Natural Gas	OTHERHollyHall	Harris	3	1200
Natural Gas	OTHERCitizensHospital	Victoria	7	2800
Natural Gas	OTHERTraditionWoodway	Harris	3	1200
Natural Gas	OTHERTraditionBuffalo	Harris	3	1200
Natural Gas	OTHERTNGWOOD	Harris	2	800
Natural Gas	OTHERRVROAKS	Harris	2	800
Natural Gas	OTHERSHAMP	Harris	2	800
Natural Gas	OTHERChildrensPlano	Collin	8	3200
Natural Gas	OTHERPepperlFuchs	Waller	3	1131
Natural Gas	OTHERStandardMeat	Dallas	3	1131
Natural Gas	OTHERPraxair	Brazoria	3	1200
Natural Gas	OTHERRavenChem	Harris	8	3200
Natural Gas	OTHERVGXI_1	Montgomery	5	2000
Natural Gas	OTHERVGXI_2	Montgomery	5	2000
Natural Gas	OTHERSUN00001	Ellis	5	2000
Natural Gas	OTHERSUN00002	Ellis	5	2000
Natural Gas	OTHERSUN00003	Ellis	2	800
Natural Gas	OTHERABBVIE	McLennan	14	5600
Natural Gas	OTHERPlanetFord	Harris	3	1131
Natural Gas	OTHERLakesideCC	Harris	3	1200
Natural Gas	HEB00292	Matagorda	3	1131
Natural Gas	HEB00616	Harris	2	754
Natural Gas	HEB00656	Harris	3	1131
Natural Gas	HEB00686	Harris	3	1131
Natural Gas	HEB00541	Harris	3	1131

Natural Gas	HEB00687	Harris	3	1131
Natural Gas	HEB00705	Montgomery	3	1131
Natural Gas	HEB00731	Harris	2	754
Natural Gas	BUC00033	Galveston	3	1131
Natural Gas	HEB00497	Harris	3	1131
Natural Gas	HEB00698	Harris	3	1131
Natural Gas	HEB00099	Harris	3	1131
Natural Gas	BUC00018	Waller	3	1131
Natural Gas	HEB00028	Galveston	3	1131
Natural Gas	HEB00063	Brazoria	4	1508
Natural Gas	BUC00040	Fort Bend	4	1508
Natural Gas	BUC00034	Harris	3	1131
Natural Gas	HEB00697	Galveston	3	1131
Natural Gas	HEB00474	Fort Bend	3	1131
Natural Gas	HEB00575	Harris	3	1131
Natural Gas	HEB00627	Fort Bend	3	1131
Natural Gas	HEB00576	Harris	3	1131
Natural Gas	HEB00110	Fort Bend	3	1131
Natural Gas	HEB00722	Montgomery	3	1131
Natural Gas	HEB00492	Harris	3	1131
Natural Gas	BUC00003	Brazoria	1	377
Natural Gas	BUC00036	Kaufman	3	1131
Natural Gas	HEB00610	Harris	3	1131
Natural Gas	HEB00057	Nueces	3	1200
Natural Gas	HEB00724	Fort Bend	3	1131
Natural Gas	HEB00742	Harris	3	1200
Natural Gas	HEB00551	Harris	3	1131
Natural Gas	HEB00614	Harris	3	1131
Natural Gas	BUC00030	Wharton	2	754
Natural Gas	HEB00069	Nueces	4	1600
Natural Gas	HEB00139	Nueces	2	800
Natural Gas	HEB00210	Nueces	2	800
Natural Gas	HEB00498	Harris	3	1131
Natural Gas	HEB00462	Nueces	3	1200
Natural Gas	HEB00558	Galveston	3	1131
Natural Gas	HEB00136	Cameron	2	800
Natural Gas	HEB00291	Cameron	3	1200
Natural Gas	HEB00707	Brazoria	3	1131
Natural Gas	HEB00727	Fort Bend	3	1200
Natural Gas	HEB00092	Victoria	4	1600
Natural Gas	HEB00270	Nueces	2	800
Natural Gas	HEB00736	Fort Bend	3	1200
Natural Gas	HEB00231	Hidalgo	2	800
Natural Gas	HEB00020	Harris	3	1131

Natural Gas	HEB00596	Fort Bend	3	1131
Natural Gas	HEB00615	Fort Bend	3	1131
Natural Gas	HEB00741	Chambers	2	800
Natural Gas	HEB00648	Harris	3	1131
Natural Gas	HEB00334	Hidalgo	3	1200
Natural Gas	HEB00720	Harris	3	1131
Natural Gas	HEB00709	Harris	3	1200
Natural Gas	HEB00554	Victoria	3	1200
Natural Gas	HEB00212	Hidalgo	2	800
Natural Gas	HEB00431	Hidalgo	3	1200
Natural Gas	BUC00035	Bell	3	1131
Natural Gas	HEB00642	Hidalgo	3	1200
Natural Gas	HEB00748	Harris	2	800
Natural Gas	HEB00649	Harris	2	800
Natural Gas	HEB00373	Williamson	2	800
Natural Gas	HEB00479	Travis	2	800
Natural Gas	HEB00223	Jim Wells	3	1200
Natural Gas	HEB00038	Hidalgo	3	1200
Natural Gas	HEB00401	Kleberg	2	800
Natural Gas	HEB00591	Williamson	4	1600
Natural Gas	HEB00667	Harris	2	800
Natural Gas	HEB00645	Harris	2	754
Natural Gas	HEB00109	Harris	3	1131
Natural Gas	HEB00491	Harris	3	1200
Natural Gas	HEB00640	Harris	2	800
Natural Gas	HEB00381	Bell	3	1200
Natural Gas	HEB00255	Webb	3	1200
Natural Gas	HEB00581	Bell	3	1200
Natural Gas	HEB00675	Brazoria	3	1131
Natural Gas	HEB00563	Fort Bend	3	1200
Natural Gas	HEB00586	Webb	3	1200
Natural Gas	HEB00747	Dallas	2	800
Natural Gas	HEB00738	Harris	3	1200
Natural Gas	HEB00540	Harris	3	1200
Natural Gas	HEB00495	Williamson	2	800
Natural Gas	HEB00054	Harris	3	1200
Natural Gas	HEB00721	Bell	3	1200
Natural Gas	HEB00236	Travis	2	800
Natural Gas	HEB00488	San Patricio	2	800
Natural Gas	HEB00553	Harris	2	800
Natural Gas	HEB00599	Harris	3	1200
Natural Gas	HEB00473	Harris	3	1200
Natural Gas	HEB00449	Webb	2	800
Natural Gas	HEB00095	Webb	4	1600

Natural Gas	HEB00182	Bell	3	1200
Natural Gas	HEB00562	Aransas	2	800
Natural Gas	HEB00546	Collin	3	1200
Natural Gas	HEB00753	Harris	2	800
Natural Gas	HEB00737	Harris	3	1200
Natural Gas	HEB00672	McLennan	3	1200
Natural Gas	BUC00044	Collin	3	1200
Natural Gas	HEB00559	Harris	2	800
Natural Gas	BUC00038	Rockwall	3	1200
Natural Gas	HEB00564	Montgomery	2	800
Natural Gas	HEBSnackPlant	Harris	4	1600
Natural Gas	HEB00574	Harris	3	1200
Natural Gas	WAL00768	Harris	3	1200
Natural Gas	WAL01103	Harris	3	1200
Natural Gas	WAL04538	Harris	3	1200
Natural Gas	WAL01040	Harris	3	1200
Natural Gas	HEB00552	Dallas	3	1200
Natural Gas	WAL03226	Harris	3	1200
Natural Gas	HEB00594	Montgomery	3	1200
Natural Gas	HEB_CPS00085	Bexar	4	1600
Natural Gas	HEB_CPS00733	Bexar	2	800
Natural Gas	HEB00756	Harris	3	1200
Natural Gas	HEB_CPS00678	Bexar	2	800
Natural Gas	HEB_CPS00699	Bexar	2	800
Natural Gas	HEB_CPS00658	Bexar	3	1200
Natural Gas	HEB_CPS00395	Guadalupe	2	800
Natural Gas	HEB_CPS00026	Comal	3	1200
Natural Gas	HEB00745	Harris	3	1200
Natural Gas	HEB_CPS00294	Bexar	2	800
Natural Gas	HEB_CPS00613	Bexar	2	800
Natural Gas	HEB_CPS00230	Bexar	2	800
Natural Gas	HEB_CPS00084	Bexar	3	1200
Natural Gas	HEB_CPS00224	Bexar	2	800
Natural Gas	BUC00048	Ellis	3	1200
Natural Gas	HEB00749	Fort Bend	3	1200
Natural Gas	HEB00383	Cameron	2	800
Natural Gas	HEB_CPS00195	Bexar	2	800
Natural Gas	HEB00423	McLennan	2	800
Natural Gas	HEB00448	Hidalgo	2	800
Natural Gas	HEB00172	Hidalgo	2	800
Natural Gas	HEB_CPS00389	Bexar	2	800
Natural Gas	HEB00434	Calhoun	2	800
Natural Gas	HEB00725	Harris	2	800
Natural Gas	HEB00485	Hidalgo	2	800

Natural Gas	HEB00715	Harris	2	800
Natural Gas	HEB00475	Bastrop	2	800
Natural Gas	HEB_CPS00480	Bexar	2	800
Natural Gas	WAL00602	Montgomery	3	1200
Natural Gas	HEB00713	Harris	2	800
Natural Gas	HEB_CPS00556	Bexar	2	800
Natural Gas	WAL03390	Montgomery	3	1200
Natural Gas	WAL04512	Harris	3	1200
Natural Gas	WAL05091	Harris	3	1200
Natural Gas	WAL00849	Harris	3	1200
Natural Gas	WAL03827	Fort Bend	3	1200
Natural Gas	WAL05045	Harris	3	1200
Natural Gas	WAL03298	Galveston	3	1200
Natural Gas	HEB_CPS00189	Bexar	2	800
Natural Gas	HEB00674	Hidalgo	2	800
Natural Gas	WAL00752	Harris	3	1200
Natural Gas	HEB_CPS00211	Bexar	2	800
Natural Gas	HEB_CPS00444	Bexar	3	1200
Natural Gas	HEB00593	Williamson	2	800
Natural Gas	WAL05116	Harris	3	1200
Natural Gas	WAL02724	Harris	3	1200
Natural Gas	HEB_CPS00106	Bexar	2	800
Natural Gas	HEB_CPS00427	Bexar	2	800
Natural Gas	WAL01232	Bell	3	1200
Natural Gas	HEB_CPS00235	Bexar	2	800
Natural Gas	HEB_CPS00397	Bexar	2	800
Natural Gas	HEB_CPS00771	Bexar	3	1200
Natural Gas	WAL03297	Harris	3	1200
Natural Gas	WAL06929	Bell	3	1200
Natural Gas	WAL00947	Grayson	3	1200
Natural Gas	HEB_CPS00732	Bexar	3	1200
Natural Gas	WAL00522	Harris	3	1200
Natural Gas	WAL00546	Fort Bend	3	1200
Natural Gas	HEB_CPS00385	Bexar	2	800
Natural Gas	WAL00744	Harris	3	1200
Natural Gas	WAL05287	Harris	3	1200
Natural Gas	WAL03225	Dallas	3	1200
Natural Gas	WAL00872	Brazoria	3	1200
Natural Gas	HEB00696	Williamson	3	1200
Natural Gas	WAL01062	Harris	3	1200
Natural Gas	HEB00441	Uvalde	2	800
Natural Gas	WAL00194	Harris	3	1200
Natural Gas	HEB00419	Maverick	2	800
Natural Gas	WAL03886	Hidalgo	3	1200

Natural Gas	WAL00896	Dallas	3	1200
Natural Gas	WAL03320	Hidalgo	3	1200
Natural Gas	WAL05165	Hidalgo	3	1200
Natural Gas	WAL03432	Dallas	3	1200
Natural Gas	WAL02439	Chambers	3	1200
Natural Gas	WAL03285	Dallas	3	1200
Natural Gas	HEB00769	Harris	3	1200
Natural Gas	WAL04298	Harris	3	1200
Natural Gas	WAL05480	Williamson	3	1200
Natural Gas	WAL03500	Harris	3	1200
Natural Gas	WAL02993	Fort Bend	3	1200
Natural Gas	WAL05612	Harris	3	1200
Natural Gas	WAL03584	Harris	3	1200
Natural Gas	WAL05713	Webb	3	1200
Natural Gas	WAL00461	Maverick	3	1200
Natural Gas	WAL00772	Harris	3	1200
Natural Gas	WAL03406	Dallas	3	1200
Natural Gas	WAL03518	Webb	3	1200
Natural Gas	WAL02667	Dallas	3	1200
Natural Gas	WAL00452	Hidalgo	3	1200
Natural Gas	WAL03224	Dallas	3	1200
Natural Gas	WAL02883	Collin	4	1600
Natural Gas	WAL03425	Harris	3	1200
Natural Gas	WAL04526	Harris	3	1200
Natural Gas	WAL03302	Harris	3	1200
Natural Gas	WAL00456	Cameron	3	1200
Natural Gas	WAL00565	Navarro	3	1200
Natural Gas	WAL02257	Harris	3	1200
Natural Gas	WAL00407	Bell	3	1200
Natural Gas	WAL00344	Wharton	2	800
Natural Gas	WAL00504	Galveston	3	1200
Natural Gas	HEB00767	Montgomery	3	1200
Natural Gas	WAL00791	Jim Wells	3	1200
Natural Gas	HEB00790	Collin	3	1200
Natural Gas	HEB00776	Harris	3	1200
Natural Gas	HEB00787	Collin	2	800
Natural Gas	WAL05959	Harris	3	1200
Natural Gas	WAL04112	Cameron	3	1200
Natural Gas	WAL05246	Wharton	2	800
Natural Gas	HEB00692	Jefferson	3	1200
Natural Gas	HEB00413	Nueces	2	800
Natural Gas	WAL00457	Orange	2	800
Natural Gas	WAL00383	Hardin	2	800
Natural Gas	HEB00184	Nueces	2	800

Natural Gas	HEB00759	Harris	3	1200
Natural Gas	WAL00777	Orange	2	800
Natural Gas	HEB00794	Collin	3	1200
Natural Gas	WAL07361	Brazoria	1	400
Natural Gas	WAL05147	Dallas	3	1200
Natural Gas	HEB00589	Jefferson	3	1200
Natural Gas	HEB00796	Collin	3	1200
Natural Gas	HEB00760	Brazoria	3	1200
Natural Gas	HEB00792	Harris	2	800
Natural Gas	WAL00915	Fort Bend	3	1200
Natural Gas	WAL06579	Matagorda	3	1200
Natural Gas	HEB00797	Harris	3	1200
Natural Gas	WAL00527	Brazoria	2	800
Natural Gas	HEB CPS00793	Bexar	3	1200
Natural Gas	HEB00798	Harris	3	1200
Natural Gas	HEB00779	Harris	3	1200
Natural Gas	HEB00646	Harris	2	800
Natural Gas	HEB00803	Dallas	2	800
Natural Gas	OTHERCNPNUDBuffalo	Harris	2	800
Natural Gas	OTHERNFBWA_1	Fort Bend	2	800
Natural Gas	OTHERNFBWA_2	Fort Bend	2	800
Natural Gas	OTHERNFBWA_3	Fort Bend	2	800
Natural Gas	OTHERFTBLID2 A	Fort Bend	14	5600
Natural Gas	OTHERFTBLID2 B	Fort Bend	14	5600
Natural Gas	OTHERNEWPP	Harris	75	30000