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PROJECT NO. 56822

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

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TARGETED WATER OR SEWER UTILITIES
QUESTION NOS. STAFF 1-1 THROUGH 1-19**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) submits this First Request for Information (RFI) to water and sewer utilities providing services in Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Waller, or Wharton counties ("Targeted Water or Sewer Utilities"). Targeted Water or Sewer Utilities must provide an answer to the questions and sub-questions in the order listed below with sufficiently detailed information to provide a complete and accurate answer to each RFI. Targeted Water or Sewer Utilities must comply with the instructions and definitions described below.

Targeted Water or Sewer Utilities must provide its response to this RFI by August 30, 2024, by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: August 12, 2024,

Respectfully Submitted,

PUBLIC UTILITY COMMISSION OF TEXAS

**DIVISION OF COMPLIANCE AND
ENFORCEMENT**

/s/John Lajzer

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CERTIFICATE OF SERVICE

I certify that notice of filing of this document was provided to all parties of record via electronic mail on August 12, 2024 in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ John Lajzer

PROJECT NO. 56822
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TARGET WATER OR SEWER UTILITIES
QUESTION NOS. STAFF 1-1 THROUGH 1-19

DEFINITIONS

1. "Targeted Water or Sewer Utility," "the Company," or "you" refers to all water or sewer utilities providing water or sewer services in Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Waller or Wharton counties.
2. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.
3. "AEP" refers to AEP Texas, Inc.
4. "CenterPoint" refers to CenterPoint Energy Houston Electric, LLC.
5. "Commission" or "PUCT" refers to the Public Utility Commission of Texas.
6. "Derecho" or "Derecho Event" refers to the windstorm event that occurred between May 16, 2024 and May 17, 2024 and impacted the gulf coast of the United States, including the city of Houston and surrounding metropolitan area.
7. "Electric service provider" refers to the entity that owns the electric meter, poles, and other distribution infrastructure required to serve an end-use customer. An electric service provider may be a municipally owned utility, electric cooperative, or an investor-owned utility, like CenterPoint or Entergy.
8. "Entergy" refers to Entergy Texas, Inc.
9. "ERCOT" refers to the Electric Reliability Council of Texas, Inc.
10. "Hurricane Beryl" or "Beryl" refers to the hurricane or storm that made landfall in the gulf coast of Texas on July 8, 2024. The term also refers to all life cycles of the storm prior to and after July 8, 2024, that ultimately in resulted Hurricane Beryl.

11. "Impacted Area" refers to the 121 Texas counties identified in Acting Governor Dan Patrick's July 6, 2024 Amended Disaster Declaration.
12. "Local Government" refers to a city, county, or other governing body.
13. "Medical and Eldercare Facilities" refers to hospitals, medical clinics, dialysis centers, assisted living or nursing home facilities, rehabilitation centers, hospice facilities, or other similar facilities.
14. "Power Generation Company" or "PGC" refers to a person, including a person who owns or operates a distributed natural gas generation facility, that: generates electricity that is intended to be sold at wholesale, including the owner or operator of electric energy storage equipment or facilities; does not own a transmission or distribution facility in this state other than an essential interconnecting facility, a facility not dedicated to public use, or a facility otherwise excluded from the definition of "electric utility" under this section; and does not have a certificated service area, although its affiliated electric utility or transmission and distribution utility may have a certificated service area.
15. "Retail Electric Provider" or "REP" refers to person that sells electric energy to retail customers in Texas and does not own or operate assets associated with the production of electricity.
16. "TDEM" refers to the Texas Department of Emergency Management.
17. "TNMP" refers to Texas-New Mexico Power Company.
18. "Trade Association" refers to a nonprofit, cooperative, and voluntarily joined association of business or professional persons who are employed by public utilities or utility competitors to assist the public utility industry, a utility competitor, or the industry's or competitor's employees in dealing with mutual business or professional problems and in promoting their common interest.
19. "Utility" or "Utilities" refers to a person or entity providing electric, water, sewer, or telecommunications service.

PROJECT NO. 56822**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO TARGETED WATER OR SEWER UTILITIES
QUESTION NOS. STAFF 1-1 THROUGH 1-19****INSTRUCTIONS**

1. Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
2. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
3. These questions are continuing in nature, and if there is a relevant change in circumstances, please submit an amended response, under oath, as a supplement to your original response.
4. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
5. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
8. Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.
9. You must file your responses under Project No. 56822 through the Commission's Interchange.

PROJECT NO. 56822**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
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QUESTION NOS. STAFF 1-1 THROUGH 1-19**

- Staff 1-1** Please provide your CCN number and identify the counties you serve that were included in Acting Governor Dan Patrick's July 6, 2024 amended disaster declaration.
- Staff 1-2** Please provide the public water system identification number and number of connections served by that water system in each of the counties identified in the response to Staff 1-1.
- Staff 1-3** Please indicate the date and duration of any extended power outage lasting more than 24 hours you experienced due to the May 2024 Derecho or Hurricane Beryl and whether the extended power outage caused a disruption to water and sewer services.
- Staff 1-4** Please provide the following information, categorized by public water system, concerning any water or sewer service interruptions during either the May 2024 Derecho or Hurricane Beryl:
- a. The duration of the water or sewer service outage;
 - b. The percentage of customers impacted by the service interruptions;
 - c. The cause of the interruption(s), if known;
 - d. If the interruption(s) was caused by an extended power outage, the identity of your electric utility;
 - e. The duration of any required notices (e.g. boil water notices) issued due to the extended power outage; and
 - f. A summary of efforts undertaken to restore water and sewer services.
- Staff 1-5** Please provide a detailed descriptions of efforts taken to alert or communicate with your customers concerning required notices (e.g. boil water notices), extended power outages, or duration of interruptions to water or sewer services caused by either the May 2024 Derecho or Hurricane Beryl.
- Staff 1-6** What coordination, if any, did you have with other local governments to notify customers about the duration of service outages or efforts taken to restore service due to the extended power outage?
- Staff 1-7** Please provide a copy of your current emergency preparedness plan and identify the page or section numbers that were activated during the May 2024 Derecho or Hurricane Beryl.

- Staff 1-8** If you are an “affected utility” as defined under Texas Water Code (TWC) § 13.1395, please indicate how your utility complied with the requirements of TWC § 13.1395(c).
- a. If you have been granted a waiver under TWC § 13.1395(j), please provide a copy of that waiver.
 - b. If your emergency preparedness plan contemplated the use of portable generators, please indicate if the generators were owned by the utility, obtained through mutual aid agreements, or shared with other affected utilities.
- Staff 1-9** If you are an “affected utility as defined under TWC §§ 13.1394 or 13.1395, provide the date you filed information identified under TWC § 13.1396(c) with applicable electric utilities and retail electric providers.
- Staff 1-10** Do you perform your own hurricane or major storm drills? If you do not, please provide a brief explanation of what your utility would need to start conducting these drills. If you do, please provide the following information:
- a. The frequency of drills;
 - b. The date of the last drill;
 - c. A description of the category of the hurricane drilled and any conditions used in that drill;
 - d. The names of any governmental entities, community organizations, or other local groups that were invited to participate in the drill and their level of involvement with the drill; and
 - e. The names of any electric, water, sewer, or telecommunication utilities that were invited to participate in the drill and their level of involvement with the drill.
- Staff 1-11** Were you asked to participate in a hurricane or major storm drill conducted by or for an electric, water, sewer, or telecommunication utility in 2024? If yes, please provide the following information:
- a. The name(s) of the requesting utility;
 - b. The date of the drill(s);
 - c. Information concerning the category of hurricane(s) drilled and any conditions used in the drill(s);
 - d. A description of your role and level of participation in the hurricane or major storm drill; and
 - e. A description of any feedback given during a post-drill review.

- Staff 1-12** Did you regularly track hurricanes or major storms that could affect your service territory before July 8, 2024. If yes, please provide a description of how you tracked storms .
- Staff 1-13** Do you plan on conducting hurricane or major storm tracking in the future as a result of Hurricane Beryl?
- Staff 1-14** Please provide the date you were contacted by Texas Department of Emergency Management before the May 2024 Derecho and Hurricane Beryl.
- Staff 1-15** Please describe any coordination calls or meetings with electric, water, sewer, or telecommunication utilities in which you participated in advance of Hurricane Beryl.
- Staff 1-16** Were you provided access to a priority call list from the electric utility(s) for your service area?
- Staff 1-17** How many days before Hurricane Beryl's landfall were you contacted by your electric utility concerning the potential of an extended power outage associated with Hurricane Beryl?
- Staff 1-18** Were you invited to participate in daily calls with your electric utility during the May 2024 Derecho or Hurricane Beryl?
- Staff 1-19** What preventative actions were taken by the utility after receiving notice of a potential extended power outage caused by the May 2024 Derecho or Hurricane Beryl?