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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 TELECOMMUNICATION UTILITIES
QUESTION NOS. STAFF 1-1 THROUGH 1-16**

The Staff (Staff) of the Public Utility Commission of Texas (Commission) submits this First Request for Information (RFI) to telecommunication utilities providing services in the Greater Houston Area (Targeted Telecommunication Utilities). Targeted Telecommunication 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 Telecommunication Utilities must comply with the instructions and definitions described below.

Targeted Telecommunication 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

John B. Lajzer

Division Director

State Bar No. 24074567

1701 N. Congress Ave

P.O. Box 13326

Austin, Texas 78711-3326

(512) 936-7285

(512) 936-7268 (facsimile)

John.lajzer@puc.texas.gov

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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 TARGETED TELECOMMUNICATION UTILITIES
QUESTION NOS. STAFF 1-1 THROUGH 1-16****DEFINITIONS**

1. "Targeted Telecommunication Utilities," "the Company," or "you" refers to telecommunication utilities providing telecommunication services within the Greater Houston Area and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
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.

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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.

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- Staff 1-1** Did you experience any disruption of service or service outages within the Impacted Area due to damage caused by Hurricane Beryl? If so, please describe the nature and causes of the outages, the duration of any outages, facilities affected by the outages, and efforts made by you and any involved third parties to restore service to customers in the Impacted Area.
- Staff 1-2** Did you experience any disruption of service or service outages in areas of Texas outside the Impacted Area due to damage caused by Hurricane Beryl? If so, please describe the nature and causes of the outages, the duration of any outages, facilities affected by the outages, and efforts made by you and any involved third parties to restore service to customers in those affected areas.
- Staff 1-3** If any outages due to a third-party infrastructure issue were caused by the impact of Hurricane Beryl, please identify the third party and describe the issue(s) and what steps were taken to resolve it and restore service to customers.
- Staff 1-4** Please describe the extent of any structural damage to your facility(s) due to Hurricane Beryl.
- Staff 1-5** Please identify the total number of customers affected by Hurricane Beryl-related outages, categorized by service type and zip code.
- Staff 1-6** Please provide a timeline outlining the progression of any Hurricane Beryl-related outages experienced by your utility from the initial disruption to complete restoration.
- Staff 1-7** Please identify any challenges or obstacles that hindered your service restoration efforts.
- Staff 1-8** Please describe any communications you had with AEP, CenterPoint, Entergy, or TNMP in advance of Hurricane Beryl concerning potential loss of power or electric service.
- Staff 1-9** Please detail the communication strategies you employed to inform your customers about the outage, restoration progress, and estimated timelines, including communication channels used.
- Staff 1-10** Please describe the customer support measures in place to address inquiries, concerns, and complaints related to the outages, specifying the availability of support channels and response times.

- Staff 1-11** Please outline any proactive outreach efforts your utility makes to vulnerable customers (e.g., elderly, disabled) who may require additional assistance during a weather emergency.
- Staff 1-12** Please describe the lessons learned from Hurricane Beryl's impact on your facilities, network infrastructure, and service delivery.
- Staff 1-13** Please outline any plans or initiatives to enhance your network's resilience to future natural disasters, including specific infrastructure upgrades or redundancy measures.
- Staff 1-14** Please describe any investments in emergency preparedness and response capabilities, such as backup power systems, redundant communication channels, or disaster recovery plans.
- Staff 1-15** Please provide a summary of any vegetation management program run by your utility to ensure adequate right of way clearance for your communications facilities.
- Staff 1-16** Has your utility conducted any studies that examine the costs and benefits of burying communications facilities in weather-volatile areas of the state? If so, please provide an executive summary from the most recent study.