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Filing Date - 2024-08-27 02:23:41 PM

Control Number - 56822

Item Number - 47

College Station Utilities
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Phone: 979-764-3560 • FAX: 979-764-3452

By signing below, based on my investigation and review, I attest to the accuracy and veracity of the information provided herein.

Signature: Timothy Ray Crabb, P.E.
Date: 8/27/2024
Name: Timothy R. Crabb, P.E.
Title: Director of Electric Utilities
Email: tcrabb@cstx.gov
Questions: 1-17, 1-18, 1-21(c), 1-22, 1-23, 1-24, 1-25, 1-33, 1-37, 1-38, 1-42, 1-51, 1-55, 1-56, 1-57, 1-60, 1-61, 1-62, 1-63, 1-67 through 1-72 1-78, 1-79, 1-81, 1-83, 1-84, & 1-98 through 1-120.

Signature:
Date: 8/27/24
Name: Thomas Rakowitz
Title: Operations Superintendent
Email: trakowitz@cstx.gov
Questions: 1-5 through 1-8, 1-10, 1-12, 1-15, 1-16, 1-26 through 1-32, 1-34 through 1-36 1-44, 1-45, 1-47, 1-48, 1-64 through 1-66, & 1-80.

Signature: Heather Pavelka
Date: 8/27/2024
Name: Heather Pavelka
Title: Electric Compliance/Records Coord.
Email: hpavelka@cstx.gov
Questions: 1-21(a)(b)

Signature:
Date: 8/27/2024
Name: Glenn Gavit
Title: Deputy Director of Electric Utilities
Email: ggavit@cstx.gov
Questions: 1-11, 1-13, 1-49, 1-54, 1-58, 1-59, 1-82, 1-85, 1-86, & 1-88 through 1-97.

Signature:
Date: 8/27/24
Name: Nathan McCray
Title: T&D Superintendent
Email: nmccray@cstx.gov
Questions: 1-9, 1-14, 1-19, 1-20, 1-46, 1-50, 1-73 through 1-77, 1-87, & 1-94.

Signature: Stacy Lee
Date: 8/27/2024
Name: Stacy Lee
Title: Electric Compliance Officer
Email: sengelmann@cstx.gov
Questions: 1-1 through 1-4, 1-39 through 1-41, 1-43, 1-52 & 1-53.

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PROJECT No. 56822

Electric Utilities - Emergency **Planning** and Event Response

Staff 1-1 Provide the following information concerning the last hurricane or major storm drill conducted in 2024:

a. The date the drill was conducted;

Response: (Stacy Lee)
April 10, 2024 – City of College Station Tornado Drill (City-wide Continuity of Operations Drill)

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;

Response: (Stacy Lee)
Not applicable – This drill was a Tornado Drill.

c. A description as to how the drill conducted in 2024 differed materially from the previous annual drill;

Response: (Stacy Lee)
Not applicable – This was the first City-wide drill. College Station does participate in ERCOT's severe weather drills annually. The drill for 2024 has not occurred yet and is scheduled for August 29, 2024.

d. The identity of all third-party vendors that assisted in either conducting or preparations for the 2024 hurricane drill;
Response: (Stacy Lee)
Not applicable – This drill was a Tornado 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;

Response: (Stacy Lee)
Not applicable – This drill was a Tornado Drill.

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;

Response: (Stacy Lee)
Not applicable – This drill was a Tornado Drill.

g. How performance during the 2024 hurricane drill was measured; and

Response: (Stacy Lee)
Not applicable – This drill was a Tornado Drill.

h. Any feed-back whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.

Response: (Stacy Lee)
Not applicable – This drill was a Tornado Drill.

Staff 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: (Stacy Lee)
No.

Staff 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:

Response: (Stacy Lee)
This was the first City-wide drill. College Station does participate in ERCOT's severe weather drills annually. The drill for 2024 has not occurred yet and is scheduled for August 29, 2024. ERCOT determines the actual events and conditions used in the storm drills.

a. How long would an actual storm be used to set the conditions for future hurricane drills?

Response: (Stacy Lee)
Not applicable (see above response)

b. What hurricanes and major storms were used to set the conditions for the 2024 hurricane drill?

Response: (Stacy Lee)
Not applicable (see above response)

Staff 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: (Stacy Lee)
No utilities invited College Station to participate.
ERCOT has invited College Station to participate in their 2024 severe weather drill. The drill for 2024 has not occurred yet and is scheduled for August 29, 2024.

Staff 1-5 Please identify all resources, internal or external, used for weather or storm tracking purposes before July 8, 2024.

Response: (Thomas Rakowitz)

- *ERCOT notices*
- *Internal Emergency Management Communications*
- *Windy.com radar*
- *Local news outlets*
- *Substation weather station*

Staff 1-6 How many days before projected landfall do you start tracking storms that could affect or disrupt operations within your service area?

Response: (Thomas Rakowitz)
Approximately 5 days before.

Staff 1-7 How many days before projected landfall did you start tracking the storm eventually named Hurricane Beryl?

Response: (Thomas Rakowitz)
5 days before:

- *7/3, OCN issued for Beryl*
- *7/5, Advisory for Beryl*
- *7/6, Watch issued for Beryl*
- *7/8, Emergency notice for Beryl making landfall*

Staff 1-8 Do you check the functionality or performance of your outage tracker as part of your regular storm preparation procedures?

Response: (Thomas Rakowitz)
Yes.

Staff 1-9 How far in advance of landfall did you initiate requests for mutual assistance?

Response: (Nathan McCray)
Mutual assistance was not required.

Staff 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: (Thomas Rakowitz)
Restoration efforts are prioritized by outage size and priority customers.

Staff 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: (Glenn Gavit)
Public announcements handled through the Electric Public Information Officer and City's Communications Department. Customer inquiries go through the Electric Key Accounts Coordinator.

Staff 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: (Thomas Rakowitz)
No (EOP: Section 10)

Staff 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: (Glenn Gavit)
None were required for Derecho and Hurricane Beryl. However, College Station would use the following if necessary:

- *Mutual Assistance Requests would go through TPPA.*
- *Contract Personnel Requests would go through the main contacts of existing contractors.*
- *Food and Lodging for internal personnel is handled using in-house stocked nonperishables, including bedding and food.*
- *Food and Lodging for contract or mutual assistance personnel would be coordinated with the City's Emergency Management Coordinator.*

Staff 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: (Nathan McCray)
There was no advance notice for Derecho. For Hurricane Beryl, College Station initiated preparations 4-5 hours in advance by having personnel in place to respond to outages. (EOP: Sections 8 & 9).

Staff 1-15 Please provide a timeline of your Company's response to the May 2024 Derecho and Hurricane *Beryl.*

Response: (Thomas Rakowitz)

Derecho
There was no advance notice for Derecho. Outage response and restoration was based on outage size and priority customers.

Hurricane Beryl

- *7/3, OCN issued for Beryl*
- *7/5, Advisory for Beryl*
- *7/6, Watch issued for Beryl*
- *7/8, Emergency notice for Beryl making landfall*
- *Initiated preparations 4-5 hours in advance by having personnel in place to respond to outages*
- *Outage response and restoration was based on outage size and priority customers.*

Staff 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: (Thomas Rakowitz)

Derecho

- *13 outages*
- *196 customers affected*
- *CAIDI, 143*
- *Total customer hours, 467.75*

Beryl

- *35 outages*
- *1412 customers affected*
- *CAIDI, 86.5*
- *Total customer hours, 2,037*

Staff 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. (Timothy)

Response: (Timothy Crabb)

- *Southwood Subdivision; 8 customers, 266 minutes, College Station, 77840, Brazos Co.*
- *Woodcreek Subdivision; 46 customers, 277 minutes, College Station, 77845, Brazos Co.*
- *Raintree Subdivision; 46 customers, 164 minutes, College Station, 77845, Brazos Co.*

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. (Timothy)

Response: (Timothy Crabb)

- *Raintree Subdivision; 2 customers, 340 minutes, College Station, 77845, Brazos Co.*
- *Merry Oaks Subdivision; 22 customers, 422 minutes, College Station, 77840, Brazos Co.*
- *Carter's Grove Subdivision; 25 customers, 378 minutes, College Station, 77840, Brazos Co.*
- *Windwood Subdivision; 11 customers, 618 minutes, College Station, 77845, Brazos Co.*

c. Identify or describe the factors that contributed to the areas identified in response to subparts (a) and (b) as being particularly vulnerable.

Response: (Timothy Crabb)
These are the older residential areas of the City that were served overhead from the back lot line, easements but no alleys.

Staff 1-18 Describe any challenges in restoring operations your Company encountered due to the May 2024 Derecho or Hurricane Beryl.

Response: (Timothy Crabb)
Waiting for environmental conditions to be safe enough for employees to work outages.

Staff 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: (Nathan McCray)
There were no documented after-action reports for either of the events. College Station did have a debrief for Hurricane Beryl, but it was an informal debrief.

Staff 1-20 Please provide any additional information and describe any concerns that may be helpful to this investigation.

Response: (Nathan McCray)
Not applicable.

Electric Utilities Communication and Coordination

Staff 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?

Response: (Heather Pavelka)
As part of an MOU, coordination is through the City's Communication Department and other City Department Directors.

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.

Response: (Heather Pavelka)
College Station does not have a call center or help desk. All calls go directly to the IVR. Voice mails and messages are reviewed by Operations Center personnel. Operations Center personnel oversee the outage call management system. Additional staff would be called in as needed.

c. For transmission and distribution utilities, please describe how your company coordinates communication to end-use customers with retail electric providers.

Response: (Timothy Crabb)
Not applicable.

Staff 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: (Timothy Crabb)
No communication was necessary before, during, and after Derecho and Hurricane Beryl.

Staff 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: (Timothy Crabb)
No customer feedback was received during or after Hurricane Beryl.

Staff 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: (Timothy Crabb)
None at this time.

Staff 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: (Timothy Crabb)
None at this time

Staff 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?

Response: (Thomas Rakowitz)
College Station does not have a call center or help desk. All calls go directly to the IVR. Voice mails and messages are reviewed by Operations Center. Operations Center personnel oversee the outage call management system. Four people work in the Operations Center.

b. Of these people, please provide the percentage of these employees that are full-time employees (FTE), contracted labor, or temporary/seasonal workers.

Response: (Thomas Rakowitz)
100% of the employees working in the Operations Center are FTEs.

c. What is the target wait time or response time for calls?

Response: (Thomas Rakowitz)
From time customer leaves message to returning call: 2-15 minutes

d. What is the target resolution time for calls?

Response: (Thomas Rakowitz)
Less than 5 minutes.

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.

Response: (Thomas Rakowitz)

None.

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: (Thomas Rakowitz)
According to Milsoft, call volume was unlimited.

Staff 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: (Thomas Rakowitz)
July 8, 2024: 432 total calls (66 peak call volume/hr.)
July 9, 2024: 109 total calls (54 peak call volume/hr.)

Staff 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: (Thomas Rakowitz)
Text Power texting system and automated outage map.

Staff 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: (Thomas Rakowitz)
Yes. Retention period is at least 2 years.

Staff 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: (Thomas Rakowitz)
Not applicable.

Staff 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. (Thomas)

Response: (Thomas Rakowitz)
None

Staff 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.

Response: (Thomas Rakowitz)

2019

b. The last date the software underpinning the outage tracker was updated.

Response: (Thomas Rakowitz)
06/12/2024

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.

Response: (Thomas Rakowitz)
Yes

d. Whether the outage tracker was mobile-friendly;

Response: (Thomas Rakowitz)
Yes

e. The languages supported by the outage tracker;

Response: (Thomas Rakowitz)
English

f. Whether the outage tracker captured circuit-specific or meter-specific information or both.

Response: (Thomas Rakowitz)
Both

g. Whether the outage tracker was cloud-based or operated through an on-premise server?

Response: (Thomas Rakowitz)

Web based

h. The maximum number of simultaneous users the outage tracker was designed to accommodate.

Response: (Thomas Rakowitz)
Unlimited

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.

Response: (Thomas Rakowitz)
None

j. The date of the last stress or load test of the outage tracker.

Response: (Thomas Rakowitz)
Not applicable.

Staff 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: (Timothy Crabb)
Not applicable.

Staff 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: (Thomas Rakowitz)
Not Applicable.

Staff 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: (Thomas Rakowitz)
College Station utilizes Text Power and the City's Communications Department to inform customers about service outages and estimated restoration times if the outage tracker is offline.

Staff 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: (Thomas Rakowitz)
No, they were not utilized during Derecho or Hurricane Beryl.

Staff 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: (Timothy Crabb)
Brazos County
46,160 AMI meters, 100% of customers

Staff 1-38 Provide the date and method (e.g., email, phone call, text message) you initially contacted local governments in the Impacted Area.

Response: (Timothy Crabb)
Not applicable.

Staff 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: (Stacy Lee)
None (EOP: Section 7)

Staff 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: (Stacy Lee)

Not applicable.

Staff 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: (Stacy Lee)
Communications is semi-annually via customer billing inserts.

Staff 1-42 For ERCOT-located utilities, please describe any communication with interconnected power generation companies regarding their operational status during Hurricane Beryl.

Response: (Timothy Crabb)
None.

Electric Utilities - Customer Restoration Workflow

Staff 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: (Stacy Lee)
Yes, College Station has an EOP already on file with the PUCT. (EOP: Sections 11, 12 and 15)

Staff 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: (Thomas Rakowitz)
College Station customer restoration of service is based on the outage size and priority customers.

Staff 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: (Thomas Rakowitz)
No changes or modifications were made to College Station's service restoration plan during these times.

Staff 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: (Nathan McCray)
07/08/2024 – Three local contract tree crews were utilized during restoration efforts. Four (4) in-house Designers were used to help with damage assessment, twenty (20) College Station Lineman were utilized to restore power during Hurricane Beryl. All outages were in Brazos County.

Staff 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: (Thomas Rakowitz)
Brazos County – 3%
1412 total customers were affected by outages of various durations.
July 8, 2024 – 34 outages – 1401 customers (3% of customers)
July 9, 2024 – 1 outage – 11 customers (.02% of customers)

Staff 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: (Thomas Rakowitz)
Calls were received and noted. Restoration was determined by the AMI system. Outage size and priority customers. College Station customer restoration of service is based on the outage size and priority customers.

Staff 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: (Glenn Gavit)
None.

Staff 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: (Nathan McCray)
Wind and heavy rain. During those periods, crews were instructed to stand down.

Staff 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: (Timothy Crabb)
None.

Staff 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: (Stacy Lee)
Yes, College Staton utilized TEEX for NIMS training on April 4-5, 2022.

Staff 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. (Stacy)

Response: (Stacy Lee)

Yes, emergency response personnel are training in ICS processes.

Distribution Infrastructure

Staff 1-54 Please explain your process for evaluating and replacing distribution poles. Please include an explanation for the following in your response:

Pole surveys performed.

a. How frequently this evaluation is conducted;
Response: (Glenn Gavit)
Every 10 years.

b. What criteria you utilize for this evaluation;
Response: (Glenn Gavit)
- *Visual inspection - Visual inspections consists of checking the type of pole, any treatments, circumference, shell rot, woodpecker holes, insect infestation, split top, broken conductor strands, broken insulators, lose ties, slack or broken guys, broken ground wires, defective cross arms or any other physical damage*
- *Excavation - An 18-inch hole around the pole is dug with a 4-inch clearance at the bottom and a 10 inch clearance at the ground line.*
- *Sounding - A pole is sounded from a height of 2 inches above the ground line to a minimum heigh of 8 feet above the ground line to locate pockets of decay*
- *Boring - A bore is made in the ground line to the center of the pole to further determine any pockets of decay. Once any bores are complete, they are plugged with tight fitting treated dowels*

c. When you decide to replace the distribution pole.
Response: (Glenn Gavit)
Minimum circumference - Effective circumference is checked with loading tables or a pole circumference calculator. Poles with less than a 3-inch shell are then further evaluated for restoration or replacements

Further evaluation - Poles with serious top defects or without sufficient wood are immediately determined to be replaced. Other poles are to be bored at 26 inches above the ground line to check for critical thickness. If there is less than 2 inches of shell at 4.5 feet above the ground line, the pole is to be replaced.

Staff 1-55 Please provide your minimum required right-of-way (ROW) width for both 3-phase and single-phase distribution lines.

Response: (Timothy Crabb)
Single-phase – 20 foot, 10 foot each side of center line
Three-phase – 30 foot, 15 foot each side of center line

Staff 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:

Response: (Timothy Crabb)
College Station had no feeder lockouts and therefore had no feeder outages during

these events.

a. The quantity and percentage of each installed pole type (e.g., wood, composite, steel, concrete, other) on the feeder before Hurricane Beryl;

Response:
Not Applicable

b. The quantity and percentage of pole failures, by pole type, due to Hurricane Beryl:

Response:
Not Applicable

Identify the primary cause of failure for each pole type on the feeder (e.g., trees, branches, wind, or other);

Response:
Not Applicable

Identify the primary point of failure of the poles (e.g., crossarm failure, pole leaning, pole break, or other);

Response:
Not Applicable

NESC construction strength and overload factors the feeder is currently built to;

Response:
Grade B at ½" of ice with 40 mph wind. If doing a calculation for a pole attachment and PLA shows that a pole is loaded beyond 70%, a stronger pole is utilized.

c. Identify which feeders are in your plans to rebuild to a higher wind loading standard; and

Response:
None

Provide an estimate for when identified rebuilds will commence.

Response:
Not Applicable

Staff 1-57 If your distribution system includes feeders with poles taller than 60-feet above ground level, please provide the following:

Response: (Timothy Crabb)
Not Applicable

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.

Staff 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: (Glenn Gavit)

Height	*Angle*	*Depth of Burial (ft.-in.)*
30	*0*	*6'-0"*
35	*0*	*6'-6"*
40	*0*	*7'-0"*
45	*0*	*7'-6"*
	6	*9'-6"*
	12	*10'-6"*
	18	*11'-6"*
50	*0*	*7'-6"*
	6	*10'-0"*
	12	*11'-0"*
	18	*12'-0"*
55	*0*	*8'-0"*
	6	*10'-6"*
	12	*11'-6"*
	18	*12'-6"*
60	*6*	*11'-0"*
	12	*12'-0"*
	18	*13'-0"*

Previous standard was 10% of pole height + 2'.

Staff 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: (Glenn Gavit)
Standard design uses 40' class 3 poles for single phase, and 45' class 3 for three phase.

Staff 1-60 Please explain the NESC construction strength and overload factors your distribution lines were built to in the past

Response: (Timothy Crabb)
Do not have this information.

Staff 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: (Timothy Crabb)
None.

Staff 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:

Response: (Timothy Crabb)

a. Provide the designed criteria for these lines;

Grade B at ½" of ice with 40 mph wind. If doing a calculation for a pole attachment and PLA shows that a pole is loaded beyond 70%, a stronger pole is utilized.

b. The type of poles installed;

- *3,521 wood poles*
- *2,314 concrete poles*
- *611 steel poles*
- *1,126 fiberglass poles*

c. The ROW widths;

Standard easement width:
20', 10' each side of center line for single phase
30', 15' each side of center line for three phase

d. Explain if these lines are designed to the latest NESC construction strength and overload factors; and

New construction is designed to the latest NESC requirements.

e. Explain if any distribution line experienced damage but remained standing.

None.

Staff 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: (Timothy Crabb)
3,521 wood poles
2,314 concrete poles
611 steel poles
1,126 fiberglass poles

Do not have NESC wind loading criteria at installation of each pole type.

Staff 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: (Thomas Rakowitz)
None

Staff 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. (Thomas)

Response: (Thomas Rakowitz)
None

Staff 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: (Thomas Rakowitz)
None

Staff 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: (Timothy Crabb)
No. There are already standards and requirements for equipment design from the NESC in these areas. Each entity has standards based upon these requirements. Developing additional requirements from another regulatory group will just add to governmental oversight and cost without a benefit to the utility or the customer. It is hubris to think an electric system can be built to withstand these events and will still be standing when other structures and trees are demolished.

Transmission Infrastructure

Staff 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:

Response: (Timothy Crabb)
None

a. How frequently this evaluation is conducted?

b. What criteria is utilized for this evaluation?

c. When do you decide to harden transmission lines?

Staff 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: (Timothy Crabb)
CSU has the following number and type of transmission poles:

- *283 concrete poles*
- *3 fiberglass poles*
- *44 steel poles*
- *11 wood poles*

The following is the current design parameters for our transmission poles:

LOAD CASE (factored loads)	DESCRIPTION	OVERLOAD CAPACITY FACTORS
1	NESC Medium District (1/4" Ice, 4 psf Wind, 15°F)	Vertical: 2.25 Tension: 2.48 Wind: 2.50
2	NESC Light (No Ice, 9 psf Wind, 30°F) All Wires Intact	Vertical: 0.00 Tension: 0.00 Wind: 0.00
2	Extreme Wind (No Ice, 25.6 psf Wind, 60°F)	Vertical: 1.00 Tension: 1.00 Wind: 1.00
3	Extreme Ice w/ Wind (1/2" Ice, 2.3 psf Wind, 15°F)	Vertical: 1.00 Tension: 1.00 Wind: 1.00
4	Longitudinal Stringing (No Ice, No Wind, 60°F)	Vertical: 0.00 Tension: 0.00 Wind: 0.00
4	Camber (No Ice, No Wind, 60°F)	Vertical: 1.50 Tension: 1.65 Wind: 2.50

Staff 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: (Timothy Crabb)
None

Staff 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: (Timothy Crabb)
None

Staff 1-72 For each transmission structure that failed due to the May 2024 Derecho or Hurricane Beryl, please provide the date of the last inspection and explain the planned frequency of those inspections. Additionally, please provide the most recent inspection report for each structure that failed.

Response: (Timothy Crabb)
Not Applicable

Vegetation Management

Staff 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.

Response: (Nathan McCray)
College Station has no vegetation management staff. We have three (3) contract crews working on College Station facilities.

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.

Response: (Nathan McCray)
College Station has no vegetation management staff. We have three (3) contract crews working on College Station facilities.

c. Please explain how you determined the appropriate level of full-time vegetation management staff for each of the last 5 years.

Response: (Nathan McCray)
College Station has no vegetation management staff. Tree trimming contractors are on a 3-year feeder trim cycle.

d. Provide the cost difference per circuit-mile between using contractors versus in-house vegetation management crews.

Response: (Nathan McCray)
Not applicable.

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: (Nathan McCray)
Not applicable.

Staff 1-74 Please describe the minimum clearance standard for vegetation along transmission and distribution power lines at various voltage levels and how these clearances were derived based on your service territory.

Response: (Nathan McCray)

8' on 7.2 kV; 70'-100' on 138 kV.

Staff 1-75 Does your company incorporate any inspection of high customer count circuit segments to proactively identify problematic vegetation for circuits that may be outside their normal cycle period?

Response: (Nathan McCray)
No

Staff 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: (Nathan McCray)
None

Staff 1-77 Does your company conduct proactive vegetation management on feeders located in hurricane prone areas? If so, how far in advance of hurricane season do you send out vegetation management crews?

Response: (Nathan McCray)
College Station is on three-year tree trimming cycles.

Staff 1-78 Please provide a list of the circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl, and provide the following information pertaining to the circuits identified:

Response: (Timothy Crabb)
College Station had no feeder outages during these events.

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.

Staff 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: (Timothy Crabb)
College Station had no feeder outages during these events.

Staff 1-80 For the May 2024 Derecho and Hurricane Beryl, please provide the percentage of forced interruptions that were related to vegetation issues.

Response: (Thomas Rakowitz)
23 of 35 outages were vegetation related (65.7 %)

Staff 1-81 What steps are being taken to address vegetation management and infrastructure issues that contributed to outages or were identified during restoration after the May 2024 Derecho and Hurricane Beryl?

Response: (Timothy Crabb)
None.

Staff 1-82 When did you last substantively review, augment, or modify your vegetation

management plan before July 8, 2024?

Response: (Glenn Gavit)
July 2023

Staff 1-83 What percentage of vegetation-related outages were caused by trees or branches outside of the easement or right of way? In responding to this question, please provide both an overall percentage and a breakdown for each county within your service territory that was affected by the May 2024 Derecho or within the Impacted Area for Hurricane Beryl.

Response: (Timothy Crabb)
Brazos County – 100%

Staff 1-84 Describe your programs or initiatives that are designed to work with property owners to address potentially hazardous vegetation management issues that are outside of the utility easement or right of way.

Response: (Timothy Crabb)
None

Staff 1-85 Identify the number of staff that participate in any program or initiative designed to address vegetation management hazards outside of the utility easement or right of way.

Response: (Glenn Gavit)
None

Staffing and **Mutual** Assistance

Staff 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;

Response: (Glenn Gavit)
TPPA mutual assistance program. Assisted Georgetown (2/2/23-2/3/23) and Greenville (6/15/23) in various storms.

b. Please provide copies of any agreements entered as part of your membership or participation in those mutual assistance programs;

Response: (Glenn Gavit)
Attached.

c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.

Response: (Glenn Gavit)
TPPA

Staff 1-87 Please describe, prior to, during, or in the aftermath of Hurricane Beryl how you integrated mutual assistance crews into your existing emergency preparedness and response processes, any coordination challenges you faced in doing so, and how you addressed any such challenges prior to, during, or in the aftermath of Hurricane *Beryl. (Nate)*

Response: (Nathan McCray)
None

Staff 1-88 Please describe the command structure and communication protocols used to manage and direct resources from mutual assistance program(s) you received assistance from prior to, during, and in the aftermath of Hurricane Beryl.

Response: (Glenn Gavit)
None.

Staff 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: (Glenn Gavit)
Not Applicable

Staff 1-90 Once you learned of the Hurricane Beryl's potential to affect your ability to provide service to your customers, what specific actions were taken to begin coordinating with and staging mutual assistance resources to respond to service issues resulting from the hurricane?

Response: (Glenn Gavit)
Not Applicable

Staff 1-91 Provide the following information concerning mutual assistance received in response to either the May 2024 Derecho or Hurricane Beryl:

Response: (Glenn Gavit)
Not applicable, College Station received no mutual assistance for either event.

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, linesmen, generators, and materials, requested from the mutual assistance program(s); and

c. Provide all documentation of requests made to mutual assistance programs and their responses to your requests.

d. If it is not evident from the documentation provided in response to Staff 1-91(c), please provide the date the request was made, the date the specific assistance requested began arriving in the Impacted Area, and the date by when the specific assistance requested was fully received.

Staff 1-92 When you receive responses to requests for assistance from other mutual assistance program participants that confirm their ability to provide the requested assistance, are you able to accept or decline resources being offered as needed, or must you accept all assistance provided in response to a request?

Response: (Glenn Gavit)
Yes, College Station is able to accept or decline resources.

Staff 1-93 What considerations did you give to reimbursement of costs and expenses incurred by participants of mutual assistance programs when making requests for assistance during the events of Hurricane Beryl?

Response: (Glenn Gavit)
Not Applicable

Staff 1-94 Please provide a list of any hurricane response staging area you established in the lead up to and in the aftermath of Hurricane Beryl. Please include the date the

center(s) was established, the location of the center(s), the day-to-day staffing levels at the center, and types of equipment and personnel staged at the center(s).

Response: (Nathan McCray)
Not Applicable

Staff 1-95 How did the rollout and deployment of mutual assistance during the events of Hurricane Beryl compare to previous hurricane events during which you requested assistance from mutual assistance programs? In your response, please specifically compare the types and quantities of resources requested, the percentage of request aid provided, the efficacy of coordination between your company and the mutual assistance provider, and the efficiency of staging, deployment, and release of those assistance resources.

Response: (Glenn Gavit)
Not Applicable

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

Response: (Glenn Gavit)
Not Applicable

Staff 1-97 Did you have to train or on-board any personnel that was provided in response to your request(s) for mutual assistance during the events of Hurricane Beryl? If yes, please describe what kind of training or on-boarding you provided.

Response: (Glenn Gavit)
Not Applicable

Mobile Generation

Response: (Timothy Crabb)
This section is not applicable to College Station as we do not have any mobile generation.

Staff 1-98 Please provide details regarding the lease or procurement of each mobile generation facility in the Transmission and Distribution Utility's (TDU) control, including:

a. Details regarding the competitive bidding process used or the justification for not using a competitive bidding process;

b. The size of each mobile generation facility in megawatts (MW);

c. The initial lease or procurement date of each facility;

d. The lease term, in months, of each mobile generation facility;

e. The expiration date of each facility's lease;

f. The to-date costs associated with each mobile generation facility, including operating, leasing costs, or other capital expense;

g. The expected costs associated with each lease, including operation and leasing costs; and

h. The expected return on investment associated with each lease or procurement

Staff 1-99 Please provide details regarding mobile generation or temporary emergency electric energy facilities (TEEEF):

a. The control number of the TDU's most recently approved mobile generation or TEEEF cost recovery;

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.

Staff 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.

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

Staff 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.

Staff 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.

Staff 1-104 Please provide the following information concerning mobile generation facilities in your possession:

a. The total capacity, in MWs, of mobile generation facilities leased or procured before July 8, 2024;

b. The rationale for leasing or procuring that capacity; and

c. And how mobility and capacity were prioritized when leasing or procuring mobile generation facilities.

Staff 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.

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

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

a. Did the TDU develop a list of critical infrastructure facilities within the TDU's service territory?

b. Did the TDU develop emergency preparedness plans in collaboration with critical infrastructure facilities in its service territory?

c. Did the TDU develop a list of routes for use in reaching critical infrastructure facilities during an emergency or significant power outage?

d. Did the TDU identify the specific steps it would take to energize critical infrastructure facilities in its service territory with mobile generation facilities?

e. Did the TDU pre-position mobile generation facilities at critical infrastructure facilities in its service territory to respond to significant power outages in a timely manner?

Staff 1-108 Please provide the following information regarding drills, procedures, and plans to use mobile generation facilities.

a. Did the TDU develop operating plans or procedures for the deployment of mobile generation? If so, please describe the 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.

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

a. How the original request for mobile generation facilities through mutual assistance was made;

b. The size, in MW, of each borrowed mobile generation facility;

c. The date 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 m 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.

Staff 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?

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

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

Staff 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.

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

Staff 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.

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

Staff 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.

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

Beryl.

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

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

OVERVIEW: These guiding principles have been drafted, through an American Public Power Association (APPA) working group process, to be used as a resource for utilities rendering and receiving mutual aid assistance through the one-page APPA mutual aid agreement. The guiding principles DO NOT address allocation of risk and liability. And, so, these guiding principles ARE NOT an amendment to the APPA agreement. But, they are offered to utilities that wish to opt-in or otherwise utilize them to guide their reimbursement and documentation needs for mutual aid assistance. Because FEMA public assistance for mutual aid costs are not assured, and can depend on particular circumstances, these guiding principles are not meant to adhere to any particular FEMA requirement, but have been assembled based upon mutually agreeable and consistent mutual aid principles among a broad selection of APPA's member utilities.

MUTUAL AID AGREEMENT
GUIDING PRINCIPLES FOR REIMBURSEMENT AND DOCUMENTATION MATTERS

These guiding principles may be used by U.S. public power utilities, and other electric utilities, that have exchanged forms of the American Public Power Association, Inc. ("**APPA**") mutual aid agreement, via APPA and [*Insert Name of State Association or other Statewide Mutual Aid Coordinator*], and that wish to adhere to the following supplemental provisions when providing or receiving mutual aid assistance:

1. **No Amendment; Policies and Procedures.** (a) These guiding principles may be used by any public power electric utility or other electric utility providing (as the "**Providing Entity**") or receiving (as the "**Requesting Entity**") mutual aid assistance, but it does not amend the APPA Mutual Aid Agreement, and is not to be interpreted or construed to do so. However, the parties hereby agree that this statement of principles applies to any mutual aid provided or received between them; this statement of principles supplements the APPA mutual aid agreement previously entered into by the parties; to the extent there are any terms that conflict, the APPA mutual aid agreement controls.

(b) If the Providing Entity has policies or procedures that differ from these guiding principles, the Providing Entity hereby indicates that it will follow those policies and procedures and discuss the same with the Requesting Entity, unless the Providing Entity and Requesting Entity acknowledge and agree these guiding principles control. To the extent the Providing Entity relies on its policies or procedures, instead of these guiding principles, it will provide copies of all such policies and procedures to the Requesting Entity.

2. **Supplemental Reimbursement Matters.** The following reimbursement matters are hereby established and deemed by the Providing Entity and the Requesting Entity to be necessary to the work performed in rendering mutual aid assistance, the subsequent invoicing and payment effort, and any potential subsequent Federal Emergency Management Agency ("**FEMA**") reimbursement effort:

(1) *Travel Time Pay*. Unless there is a controlling collective bargaining or other labor agreement that requires a different approach, the Requesting Entity will reimburse the Providing Entity for the actual costs it incurs for the travel time of its personnel (*i.e.*, pay and benefits), as follows: (A) when the Providing Entity is traveling to the Requesting Entity, from the time the Providing Entity's personnel leave its home facility until such personnel arrive at the Requesting Entity's muster or intake location; and (B) when the Providing Entity is returning to its home facility from the Requesting Entity's location, from the time the Providing Entity's personnel leave its last work or overnight accommodation location until it arrives at its home facility. Travel time, referenced in the previous sentence, includes reasonable time incurred to prepare for initial travel at the Providing Entity's shop. If equipment breaks down or is damaged during travel and the Providing Entity requires certain of its personnel to stay with the equipment until repairs are made, the Requesting Entity will reimburse the Providing Entity for the actual costs it incurs to pay its personnel, related to equipment repair waiting time. If the Providing Entity is released from mutual aid assistance by the Requesting Entity, and travels to a subsequent utility to provide mutual aid, the Requesting Entity has no liability for the Providing Entity's costs incurred for its personnel to travel from the Requesting Entity location to the subsequent utility's location for additional mutual aid assistance. For equipment, hourly or mileage rates will be reimbursed by the Requesting Entity, including equipment travel time (calculated on the basis of the recorded work hours of the Providing Entity's individual person(s) to whom each piece of equipment is assigned).

(2) *Emergency Travel; Crew Swaps*. The Requesting Entity will reimburse the Providing Entity for its travel costs incurred (*e.g.*, plane tickets) for travel for personnel who have to return home on an emergency basis from mutual aid assistance. Taking into account due exigencies, the Providing Entity will endeavor to limit or minimize emergency travel costs. The Providing Entity's costs for swapping crews will be reimbursed on a not less than two-week crew rotation basis. The Requesting Entity will not be responsible for the Providing Entity's costs in swapping crews on a less than two week basis, or for replacing personnel who have to return home from mutual aid assistance for reasons that are not an emergency. As used in this clause (2) of section 2, "**emergency**" means an exigent or severe circumstance that requires an individual to return home as soon as reasonably possible to meet family, personal, or similar needs. An example of an emergency includes the death or severe illness (requiring hospitalization or non-elective surgical intervention) of a close family member. As the term is used here, "emergency" does not include planned or elective matters such as vacations, weddings, birthdays, graduations, court dates, elective medical procedures, or similar activities.

(3) *Equipment Breakdown Costs*. If any of the Providing Entity's equipment breaks down or is damaged as a direct result of performing mutual aid assistance for the Requesting Entity, more than 50 miles from the Providing Entity's home facility, and must be repaired prior to returning to the Providing Entity's home facility (*e.g.*, a truck breaks down and is inoperable), then the Requesting Entity will reimburse the Providing Entity for its actual

repair costs, unless the Providing Entity is charging the Requesting Entity for such equipment using FEMA rates (which are inclusive of repair costs). The Requesting Entity is not responsible for repair costs of the Providing Entity's equipment that breaks down, but does not have to be repaired for it to be returned to the Providing Entity's home facility (*e.g.*, a bucket lift mechanism fails, but does not render a truck inoperable to be driven back to the Providing Entity's home facility). The Requesting Entity is also not responsible for repair costs of equipment that breaks down or is damaged before arriving at the Requesting Entity's location, except that the Providing Entity must promptly notify the Requesting Entity of the equipment break down, and coordinate on the need for replacement equipment, if any, and how replacement equipment will be compensated. To the extent that there is a reasonable basis for any of Providing Entity's personnel to stay with the equipment while repairs are being made, where the Requesting Entity is responsible for the costs of such repairs pursuant to the first sentence of this clause (3), the Requesting Entity's obligations for Providing Entity's personnel costs is hereby limited to (A) the minimum number of personnel that need to remain with the equipment for repairs and return of the equipment to Providing Entity's home facility, and (B) no more than the Providing Entity's normal billable work day, per day, for such personnel who are remaining with the equipment during repairs.

(4) *Food*. If the Requesting Entity provides food (including meals, snacks, or both) for the Providing Entity's personnel providing mutual aid assistance, the Requesting Entity will not be responsible for food costs incurred by the Providing Entity, unless the nature of the mutual aid assistance work or other events prevent the Providing Entity's personnel from physically being able to eat the food provided by the Requesting Entity (including prepared food shortages from the Requesting Entity). The Requesting Entity will not be responsible for food costs for the Providing Entity's personnel while they are traveling, beyond *per diem* meals and incidentals rates established and published from time to time by the United States General Services Administration (GSA) for the area where the mutual aid work is to occur. (GSA *per diem* rates may be available at https://www.gsa.gov/travel /plan-book/per-diem-rates.) *Per diem* rates will be based on the location, or nearest GSA reference location to, where the expenses are incurred.

(5) *Laundry Services*. If the Requesting Entity provides laundry services for the Providing Entity's personnel providing mutual aid assistance, the Requesting Entity will not be responsible the Providing Entity's separate costs incurred for its personnel's laundry. If the Requesting Entity does not provide such laundry services, it will reimburse the Providing Entity for actual laundry costs incurred for Providing Entity's personnel.

(6) *Hotel Accommodations*. The Requesting Entity must either arrange for or approve (which approval can be given by the Requesting Entity as a part of the subsequent reimbursement process) Providing Entity's hotel accommodations during travel and in the locale of mutual aid assistance work. Except to the extent that double-occupancy hotels rooms are not available, the Requesting Entity will only reimburse the Providing Entity for its hotel costs incurred on a double-occupancy basis. The Requesting Entity will reimburse

the Providing Entity only for hotel room night costs, and will not be responsible for miscellaneous or individual charges, such as mini bar charges, room service, telephone calls, in-room movies, excessive tipping (greater than 20%), and business center charges (unless the Providing Entity provides documentation that business center charges are related to the provision of mutual aid assistance to the Requesting Entity). The Providing Entity must provide a copy of all itemized hotel folios for hotel room nights where reimbursement is sought from the Requesting Entity, with records of occupant(s) of each room and check-in and check-out dates, along with any other supporting information requested by the Requesting Entity. If the Requesting Entity provides accommodations in the locale of mutual aid assistance work (*e.g.*, base camps), the Requesting Entity will not be responsible for the Providing Entity's costs for hotel accommodations, except during travel.

(7) *Personal Item Costs*. The Requesting Entity will not be responsible for reimbursing the Providing Entity for any costs incurred by the Providing Entity for personal items that are for individual comfort or convenience of the Providing Entity's personnel. This includes items such as alcohol, snuff or other tobacco products, coolers, toiletries, medicines, non-work consumables, *etc,*.

(8) *Materials and Supplies*. The Requesting Entity will only be responsible for reimbursing the Providing Entity for materials and supplies that it purchases, or supplies to its personnel providing mutual aid assistance from inventory, to the extent such materials and supplies are of a reasonable quantity for the number of the Providing Entity's personnel performing mutual aid assistance. For personal equipment such as safety equipment, safety glasses, rubber sleeves, flame retardant clothing (FR2), belts, climbers, boots, gloves, raincoats, hardhats, etc., there is a presumption by the Requesting Entity that the labor rates for the Providing Entity's personnel include the provision of such personal equipment. However, if the Providing Entity needs to purchase or issue such personal equipment to its personnel providing mutual aid assistance, and seeks reimbursement from the Requesting Entity for the same, the Providing Entity must provide documentation as to the necessity of providing such personal equipment for that mutual aid assistance effort. In that case, the Requesting Entity will only be responsible for reimbursing the Providing Entity for such personal equipment (A) in an amount that corresponds to the number of personnel needing such equipment and providing mutual aid assistance, with a minimal, reasonable allowance for extra items, and (B) only to the extent that such personal equipment cannot be reused by the Providing Entity's personnel after the mutual aid assistance is completed. For items of the Providing Entity's inventory that is used or incorporated into the Requesting Entity's electrical system in the performance of mutual aid assistance, the Requesting Entity will reimburse the Providing Entity only for inventory items where there is documentation showing that such inventory items were used or incorporated into the Requesting Entity's electrical system.

3. **Documentation to Support the Providing Entity's Costs in Providing Mutual Aid Assistance**. As FEMA reimbursement for mutual aid assistance costs incurred by the Requesting

Entity may require the Requesting Entity to provide extensive documentation concerning the Providing Entity's work to support its FEMA reimbursement claims, the Requesting Entity requests and the Providing Entity hereby agrees to provide the following information for its mutual aid assistance rendered to the Requesting Entity:

(1) For the Providing Entity's wages and salaries, including benefits, the Providing Entity will provide a copy of its pay and benefits policy(ies), including information that identifies its labor rates, benefits, overtime pay, and any special pay that may be applicable to mutual aid assistance.

(2) The Providing Entity will provide documentation to support all mobilization and demobilization costs and document each item of mobilization costs incurred and billed to the Requesting Entity.

(3) For personnel travel, the Providing Entity will identify for each vehicle, who is driving and who is a passenger, including all changes of drivers.

(4) The Providing Entity will identify which equipment travels with which crews in a way that permits the Requesting Entity to identify crew and equipment together, including any changes of equipment or crews that occurs during the mutual aid assistance effort.

(5) For crew swaps and any replacement of the Providing Entity's personnel providing mutual aid assistance, on an emergency or non-emergency basis, the Providing Entity will provide a log or other documentation identifying each individual's starting and ending time for the whole of the Providing Entity's mutual aid assistance effort to the Requesting Entity.

(6) Unless using FEMA standard rates, which include fuel, the Providing Entity will track all fuel costs and provide documentation for all of its actual costs for fuel for all vehicles and equipment. Fuel receipts must indicate the volume of fuel purchased and the cost per measured unit.

(7) If the Providing Entity is aware, or is notified by the Requesting Entity, that its rates for equipment are higher than standard FEMA rates, the Providing Entity will provide documentation justifying the higher rates to the reasonable satisfaction of the Requesting Entity. If FEMA rates are not utilized, the Providing Entity should use rates which include all costs for ownership and operation of equipment, including depreciation, overhead, all maintenance, field repairs, lubricants, tires, OSHA equipment and other costs incidental to operation.

(8) The Providing Entity will respond in the full, to the best of its knowledge and ability, to all requests for documentation from the Requesting Entity related to the Requesting Entity's FEMA reimbursement claims.

(9) If the Providing Entity is released from mutual aid assistance and travels to a subsequent utility to provide mutual aid, instead of returning to its home facility, the Providing Entity will identify the subsequent utility and provide contact information for such subsequent utility.

(10) For any equipment repair costs that are reimbursable to the Providing Entity pursuant hereto, the Providing Entity will provide all documentation and other maintenance records that demonstrate the equipment was regularly maintained and in good operational order prior to the breakdown or damage. For equipment damage repairs, the Providing Entity shall provide all available details on when, where, and how the damage occurred.

4. **Invoice Documentation**. The Providing Entity will provide the following information to support its invoice(s) to the Requesting Entity:

(1) If the Providing Entity is billing by time and equipment rates (*i.e.*, not using FEMA rates):

(A) a rate sheet for all labor and equipment charges (with the FEMA benefit calculation sheet for indirect labor charge evidence);

(B) daily timesheets and equipment logs signed (or otherwise electronically approved, as applicable) by authorized field personnel indicating for each work location or task:

(i) each employee's name, position, type of employment (*i.e.*, full-time exempt, full-time non-exempt, part-time, temporary, *etc.*) and days and hours worked;
(ii) each employee's rate of pay for regular hours and overtime hours;
(iii) the total number of hours worked each day by each employee (including those recorded as regular hours and overtime hours);
(iv) location of the work, unless location(s) of the work are directed by the Requesting Entity, including pole number, address, or other reasonable identification information;
(v) detailed description of the work, unless kept by the Requesting Entity
(vi) details of all equipment used, including date of use, trip origin odometer reading, trip destination odometer reading, make, model, vehicle number, and hours used; and
(vii) miscellaneous expenses (including copies of all receipts);

(C) charges for the Providing Entity's general and administrative (G&A) costs, which the Providing Entity must include as a separate line item (and itemized) in invoicing to the Requesting Entity; and

(D) charges for hotel and food while traveling to and from the mutual aid assistance destination with detail (*i.e.*, name(s) of room occupant(s), name and location of hotel, check-in and check-out dates, itemized hotel folio, itemized food receipts (if any), names of personnel consuming food).

(2) If the Providing Entity is utilizing FEMA equipment rates, fuel, maintenance, and repair costs cannot be separately charged.

5. **Return of the Requesting Entity's Equipment**. Providing Entity shall comply with this section 5 unless the Requesting Entity provides different direction. To ensure that all of the Requesting Entity's equipment, inventory, machinery, supplies, or other items issued to or used by the Providing Entity's personnel during mutual aid assistance is returned to or used for the Requesting Entity, the Providing Entity will identify a crew leader for each of its crews, and the crew leader will each day log any of the Requesting Entity's equipment, inventory, machinery, supplies, or other item issued to or used by that crew in that day's mutual aid assistance effort. Such crew leader's log will identify all items that are incorporated into the Requesting Entity's electrical system, or consumed in the mutual aid assistance effort (for consumables). (Miscellaneous low cost and other *de minimis* items (*e.g.*, nuts and bolts) may be estimated.) All other items on the crew leader's log will be checked-back to the Requesting Entity, by the crew leader, prior to the Providing Entity's crew being released by the Requesting Entity from mutual aid assistance.

6. **Other Requesting Entity Requirements**. The Requesting Entity may request or require information and documentation requirements than are in addition to what is provided in this statement of principles. Nothing in this statement of principles supersedes or negates any of the Requesting Entity specific requirements. In the event of a conflict between this statement of principles and the Requesting Entity's own documentation, the Requesting Entity's documentation controls.

[*Acknowledgement Sheet Follows*]

To indicate the parties have reviewed and reached agreement on the applicability of this statement of principles an authorized person from each of the Providing Entity and the Requesting Entity initials below.

on behalf of

Utility or Company: _____

_____ Name: _____

Initials Title: _____

EXECUTION NOTE: APPA will keep this guiding principles document on file for each APPA member that executes it, like the APPA mutual aid agreement, and will distribute it, or provide for its distribution, to members involved in mutual aid, along with the mutual aid agreement.