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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 §

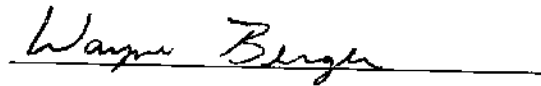
**CITY OF CUERO'S RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO TARGETED ELECTRIC MOUS
QUESTION NOS. STAFF 1-1 THROUGH 1-120**

TO: John Lajzer, Public Utility Commission of Texas, 1701 N. Congress Ave., Austin, Texas
78711

City of Cuero ("City of Cuero") files these responses to Commission Staff's First Request for Information to Targeted Electric MOUS, Question Nos Staff 1-1 through 1-120 ("Staff's First RFIs to MOUs"). Commission Staff directed that responses to Staff's First RFIs to MOUs be filed by August 30, 2024, thus these responses are timely filed. City of Cuero stipulates that its responses may be treated by all parties as if they were filed under oath.

Dated: August 26, 2024,

Respectfully Submitted,



Wayne Berger
City Manager
City of Cuero
212 E. Main
P.O. Box 660
Cuero, Texas 77954
Wayne Berger citymanager@cityofcuero.com
(361) 275-8716 (office)

Section-1: Electric Utilities - Emergency Planning and Event Response		Response	Sponsor
1.1	<p>Provide the following information concerning the last hurricane or major storm drill conducted in 2024:</p> <p>a. The date the drill was conducted;</p> <p>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;</p> <p>c. A description as to how the drill conducted in 2024 differed materially from the previous annual drill;</p> <p>d. The identity of all third-party vendors that assisted in either conducting or preparations for the 2024 hurricane drill;</p> <p>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;</p> <p>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;</p> <p>g. How performance during the 2024 hurricane drill was measured; and</p> <p>h. Any feed-back whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.</p>	<p>a) The City of Cuero has not conducted a hurricane or major storm drill in 2024. The City's most recent drill was 10/31/23. The City activated the City's Electric System Emergency Operation Plan (EOP) on 1/12/24 at 10:00 AM.</p> <p>b) N/A</p> <p>c) N/A</p> <p>d) N/A</p> <p>e) N/A</p> <p>f) N/A</p> <p>g) N/A</p> <p>h) N/A</p>	Wayne Berger, City Manager
1.2	<p>Do you ever seek participation of your customers during a hurricane drill? If yes, please provide a description of their level of involvement.</p>	No. City of Cuero has not sought the participation of customers in a Hurricane Drill.	Wayne Berger, City Manager
1.3	<p>Are actual events and conditions experienced during a previous hurricane or storm used in next year's hurricane or major storm drill? If yes:</p> <p>a. How long would an actual storm be used to set the conditions for future hurricane drills?</p> <p>b. What hurricanes and major storms were used to set the conditions for the 2024 hurricane drill?</p>	The City has based drills on actual storms situations and lessons learned from past storms. However, the City has not conducted an EOP drill in 2024.	Wayne Berger, City Manager
1.4	<p>Please identify any electric, water, sewer, or telecommunication utilities that invited you to participate in their 2024 hurricane or major storm drill.</p>	The City of Cuero has not received any invitations from other utilities to participate in a 2024 hurricane or major storm drill.	Wayne Berger, City Manager
1.5	<p>Please identify all resources, internal or external, used for weather or storm tracking purposes before July 8,2024.</p>	The City of Cuero utilizes the National Weather Service; the Weather Channel; and also receives weather and grid conditions updates from LCRA and ERCOT.	Wayne Berger, City Manager
1.6	<p>How many days before projected landfall do you start tracking storms that could affect or disrupt operations within your service area?</p>	City of Cuero monitors conditions in the Atlantic and Gulf of Mexico to track all storms that are predicted to have a potential impact along the Texas coast. The number of days can vary depending on the projected path and speed of the tropical depression, tropical storm or hurricane.	Wayne Berger, City Manager
1.7	<p>How many days before projected landfall did you start tracking the storm eventually named Hurricane Beryl?</p>	The City of Cuero did not keep records on when the City started tracking Hurricane Beryl, however Beryl was tracked several days in advance of projected landfall.	Wayne Berger, City Manager
1.8	<p>Do you check the functionality or performance of your outage tracker as part of your regular storm preparation procedures?</p>	The City of Cuero does not have an OMS system, but the City does utilize the City's AMI system to assist with outage tracking.	Wayne Berger, City Manager
1.9	<p>How far in advance of landfall did you initiate requests for mutual assistance?</p>	The City of Cuero did not require any mutual assistance related to Hurricane Beryl.	Wayne Berger, City Manager

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.	In a major or significant outage, the City's standard approach is included in the City's EOP (City of Cuero EOP – Annex B). The City prioritizes restoring power to the most accounts as possible, by focusing on the City's main distribution backbone (feeders) and is also prioritizing various types of critical loads, including W/WW loads as well as nursing homes and other listed Critical Accounts.	Wayne Berger, City Manager
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.	These procedures for communicating with various entities and stakeholders are in the City's EOP (City of Cuero EOP – Section 2). During an emergency the City of Cuero handles complaints and for communicating with the following constituencies: <ul style="list-style-type: none"> ▪ The public; ▪ the media; ▪ customers; ▪ the commission; ▪ the Office of Public Utility Counsel (OPUC); ▪ local and state governmental entities, ▪ officials, ▪ and emergency operations centers, ▪ ERCOT; and ▪ critical load customers directly served by the entity. 	Wayne Berger, City Manager
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.	The City of Cuero utilizes the emergency levels in the City's EOP (City of Cuero EOP - Section 5.5).	Wayne Berger, City Manager
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.	The system and tools used to manage all emergency response assignments are contained in the City's EOP (which has been filed at the Commission).	Wayne Berger, City Manager
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.	City of Cuero did not activate the City's EOP for the May-2024 Derecho or Hurricane Beryl events. These storms did not have significant impact on the City's utility services.	Wayne Berger, City Manager
1.15	Please provide a timeline of your Company' s response to the May 2024 Derecho and Hurricane Beryl.	N/A. No responses to these storms.	Wayne Berger, City Manager
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.	City of Cuero did not experience storm outages during the May-2024 Derecho or Hurricane Beryl.	Wayne Berger, City Manager
1.17	Provide the following information concerning your service territory: a. Identify the geographic areas that experienced the highest number of outages and longest duration of outage due to the May 2024 Derecho. Your response should identify the neighborhood, City, zip code, and county if possible. b. Identify the geographic areas that experienced the highest number of outages and longest duration of outage due to Hurricane Beryl. Your response should identify the neighborhood, City, zip code, and county if possible.	a) The City of Cuero did not experience outages due to the May 2024 Derecho. b) The City of Cuero did not experience outages due to Hurricane Beryl. c) N/A	Wayne Berger, City Manager

	c. Identify or describe the factors that contributed to the areas identified in response to subparts (a) and (b) as being particularly vulnerable.		
1.18	Describe any challenges in restoring operations your Company encountered due to the May 2024 Derecho or Hurricane Beryl.	N/A	Wayne Berger, City Manager
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.	N/A	Wayne Berger, City Manager
1.20	Please provide any additional information and describe any concerns that may be helpful to this investigation.	No additional information or concerns.	Wayne Berger, City Manager
Section-2: Electric Utilities Communication and Coordination		Response	Sponsor
1-21	Provide the following information concerning the communication strategy and policy in place before July 8,2024: a. What consideration is given to local governments, community organizations, and other electric, water, sewer, and telecommunication utilities concerning your communication strategy after a hurricane or major storm in your service territory? b. Describe any augmentation to staffing at call centers or help desks that would occur in advance of or after a hurricane or major storm entered your service territory. c. For transmission and distribution utilities, please describe how your company coordinates communication to end-use customers with retail electric providers.	a) After a major storm, the City of Cuero emergency operations personnel strategy is to communicate to area governmental entities, utilities, and other community organizations as needed. b) The City of Cuero does not have a call center or help desk resources. The City relies on City / Utility personnel to staff communications prior to or after a hurricane or major storm. c) The City of Cuero utilizes social media and the City's website to communicate to end-use customers.	Wayne Berger, City Manager
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.	The City of Cuero utilizes social media and the City's website to communicate to end-use customers. The May 2024 Derecho and Hurricane Beryl only required standard pre-storm preparation communications.	Wayne Berger, City Manager
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.	The City of Cuero did not have any restoration during and in the aftermath of Hurricane Beryl.	Wayne Berger, City Manager
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?	The City of Cuero continually works to improve coordination and to open lines of communication with all area agencies and stakeholders. This is primarily done by developing relationships with local and regional organizations and stakeholders.	Wayne Berger, City Manager
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?	No additional steps to improve coordination and communication with other electric, water, sewer, and telecommunication utilities for future significant weather events are being taken at this time.	Wayne Berger, City Manager
1-26	Provide the following information concerning call centers and help desks used by your company before July 8,2024: a. How many people work in call centers or help desks? b. Of these people, please provide the percentage of these employees that are full-time employees (FTE), contracted labor, or temporary/seasonal workers. c. What is the target wait time or response time for calls? d. What is the target resolution time for calls?	a) The City of Cuero Utility Office utilizes 4 full-time personnel responsible for taking and responding to calls. b) 100% FTE. c) Target response time is immediate. d) Target resolution time is based on the situation. e) City personnel take ongoing customer service training; attend conferences; and train during City staff meetings.	Wayne Berger, City Manager

	<p>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.</p> <p>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?</p>	f) N/A.	
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.	No increase in call volume due to no impact of the May-2024 Derecho or Hurricane Beryl.	Wayne Berger, City Manager
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.	The City of Cuero provides information to local, and state leaders as requested.	Wayne Berger, City Manager
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.	The City of Cuero does not record calls to the City's help desk.	Wayne Berger, City Manager
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.	The City of Cuero has a work order system that is initiated by a customer call or report. The City did not have any calls or work orders during or in the aftermath of Hurricane Beryl.	Wayne Berger, City Manager
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.	City of Cuero did not make any pre-recorded messages related to either the May 2024 Derecho or Hurricane Beryl.	Wayne Berger, City Manager
1-32	<p>2024:</p> <p>a. The date the outage tracker was rolled out to customers.</p> <p>b. The last date the software underpinning the outage tracker was updated.</p> <p>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.</p> <p>d. Whether the outage tracker was mobile-friendly;</p> <p>e. the languages supported by the outage tracker;</p> <p>f. Whether the outage tracker captured circuit-specific or meter-specific information or both.</p> <p>g. Whether the outage tracker was cloud-based or operated through an on premise server?</p> <p>h. The maximum number of simultaneous users the outage tracker was designed to accommodate.</p> <p>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.</p> <p>j. The date of the last stress or load test of the outage tracker.</p>	<p>a) The City of Cuero does not have an Outage Management System (OMS).</p> <p>b) The City of Cuero does not have an Outage Management System (OMS)</p> <p>c) The City of Cuero does not have an Outage Management System (OMS)</p> <p>d) The City of Cuero does not have an Outage Management System (OMS)</p> <p>e) The City of Cuero does not have an Outage Management System (OMS)</p> <p>f) The City of Cuero does not have an Outage Management System (OMS)</p> <p>g) The City of Cuero does not have an Outage Management System (OMS)</p> <p>h) The City of Cuero does not have an Outage Management System (OMS)</p> <p>i) The City of Cuero does not have an Outage Management System (OMS)</p> <p>j) The City of Cuero does not have an Outage Management System (OMS)</p>	Wayne Berger, City Manager
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.	The City of Cuero does not have an Outage Management System (OMS).	Wayne Berger, City Manager
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.	The City of Cuero does not have an Outage Management System (OMS).	Wayne Berger, City Manager

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.	The City of Cuero does not have an Outage Management System (OMS) and relied on established policies to communicate with and inform customers about any outage and restoration times.	Wayne Berger, City Manager
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.	The City of Cuero did not utilize any emergency operations processes or policies for the May 2024 Derecho event or in the aftermath of Hurricane Beryl.	Wayne Berger, City Manager
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.	The City of Cuero has 100% AMI / Smart Meters installed on all City electric accounts.	Wayne Berger, City Manager
1-38	Provide the date and method (e.g., email, phone call, text message) you initially contacted local governments in the Impacted Area.	The City of Cuero did not formally contact local governments during the Derecho and Hurricane Beryl.	Wayne Berger, City Manager
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.	The City of Cuero coordinates and communicates across City departments and reaches out to other critical accounts in advance of hurricanes and major storms. This process is detailed in the City's EOP (City of Cuero EOP – Section 2 and Annex B).	Wayne Berger, City Manager
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.	The City of Cuero did not formally contact critical care facilities in advance of Hurricane Beryl, due to the forecast of limited impact to the City's service area.	Wayne Berger, City Manager
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.	The City of Cuero communicates with critical care and at-risk customers about service outages and restoration on an as-needed basis. The City utilizes "Civic Ready" to alert customers about potential emergency situations and storm preparation.	Wayne Berger, City Manager
1-42	For ERCOT-located utilities, please describe any communication with interconnected power generation companies regarding their operational status during Hurricane Beryl.	N/A. The City of Cuero does not have any interconnections with PGCs.	Wayne Berger, City Manager
Section-3: Electric Utilities - Customer Restoration Workflow		Response	Sponsor
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.	The City of Cuero's service restoration plan and procedures are contained in the City's EOP (City of Cuero EOP - Annex B), which has been filed with the Commission.	Wayne Berger, City Manager
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.	The City of Cuero's service restoration plan and procedures are contained in the City's EOP (City of Cuero EOP - Annex B), which has been filed with the Commission.	Wayne Berger, City Manager
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.	The City of Cuero did not make any changes or modifications to the City's service restoration plan(s) during and in the aftermath of the May 2024 Derecho or Hurricane Beryl.	Wayne Berger, City Manager
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.	The City of Cuero (DeWitt County) did not conduct a damage assessment and did not deploy crews related to restoration efforts for Hurricane Beryl.	Wayne Berger, City Manager

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.	The City of Cuero did not any service outages caused by Hurricane Beryl.	Wayne Berger, City Manager
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.	The City did not experience any impacts to electric service during or after Hurricane Beryl.	Wayne Berger, City Manager
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.	The City of Cuero did not coordinate with local, state, and federal agencies, as well as any other stakeholders regarding service restoration before, during, and after Hurricane Beryl because the City did not experience significant outages related to the storm.	Wayne Berger, City Manager
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.	N/A. The City of Cuero did not experience any outages due to Hurricane Beryl.	Wayne Berger, City Manager
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.	N/A. The City of Cuero did not have any lessons learned from Hurricane Beryl storm.	Wayne Berger, City Manager
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.	The City of Cuero had emergency personnel that utilize NIMS, and the City's Electric Utility is able to implement NIMS to the extent that is practical.	Wayne Berger, City Manager
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.	Yes. The City of Cuero emergency response personnel are trained in ICS.	Wayne Berger, City Manager
Section-4: Distribution Infrastructure		Response	Sponsor
1-54	Please explain your process for evaluating and replacing distribution poles. Please include an explanation for the following in your response: a. How frequently this evaluation is conducted; b. What criteria you utilize for this evaluation; c. When you decide to replace the distribution pole.	a) The City of Cuero evaluates and replaces poles in an ongoing manner, as the City's Electric Department personnel are working in the field and responding to various reports and situations. b) The criteria used includes ongoing observation and situational testing. c) The decision to replace distribution poles is made by the Electric Superintendent or authorized Electric Department personnel based on observational and testing evidence.	Wayne Berger, City Manager
1-55	Please provide your minimum required right-of-way (ROW) width for both 3-phase and single-phase distribution lines.	The City of Cuero minimum ROW for single-phase and for 3-phase is 20 feet. ROW on main circuits are often much large based on proximity to streets and highways.	Wayne Berger, City Manager
1-56	Identify all feeders on your distribution system affected by Hurricane Beryl or the May 2024 Derecho and provide the following for each identified feeder in MS Excel format: a. The quantity and percentage of each installed pole type (e.g., wood, composite, steel, concrete, other) on the feeder before Hurricane Beryl; b. The quantity and percentage of pole failures, by pole type, due to Hurricane Beryl; c. Identify the primary cause of failure for each pole type on the feeder (e.g., trees, branches, wind, or other); d. Identify the primary point of failure of the poles (e.g., crossarm failure, pole leaning, pole break, or other);	The City of Cuero did not have any distribution feeders impacted by Hurricane Beryl or the May 2024 Derecho. a) N/A b) N/A c) N/A d) N/A e) N/A	Wayne Berger, City Manager

	<p>e. NESC construction strength and overload factors the feeder is currently built to;</p> <p>f. Identify which feeders are in your plans to rebuild to a higher wind loading standard; and</p> <p>g. Provide an estimate for when identified rebuilds will commence.</p>	<p>f) N/A</p> <p>g) N/A</p>	
1-57	<p>If your distribution system includes feeders with poles taller than 60-feet above ground level, please provide the following:</p> <p>a. Identify each feeder that has any number of poles meeting this criteria;</p> <p>b. Explain the damage experienced on these lines due to either the May 2024 Derecho or Hurricane Beryl; and</p> <p>c. Explain the design criteria for these types of lines.</p>	<p>The City of Cuero does not have any 60-foot poles on the City's distribution system.</p> <p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p>	Wayne Berger, City Manager
1-58	<p>Please explain your standard for distribution pole embedment. In your response, please explain if this standard has changed in the last 10 years.</p>	<p>The City of Cuero utilizes the standard utility construction standards to determine distribution pole embedment. The City has not changed this standard in the past 10 years.</p>	Wayne Berger, City Manager
1-59	<p>Please provide the standard distribution pole size and class for both single and three phase lines on your system within the Impacted Area.</p>	<p>The City of Cuero's distribution system was not impacted by the Hurricane Beryl or the May 2024 Derecho.</p>	Wayne Berger, City Manager
1-60	<p>Please explain the NESC construction strength and overload factors your distribution lines were built to in the past.</p>	<p>The City of Cuero distribution system was constructed to NESC strength and overload factors for all overhead distribution construction.</p>	Wayne Berger, City Manager
1-61	<p>Please explain any new NESC construction strength and overload factors you adopted for distribution lines in the last two years to improve system resiliency.</p>	<p>The City of Cuero has not adopted any new construction strength and overload factors you adopted for distribution lines in the last two years.</p>	Wayne Berger, City Manager
1-62	<p>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:</p> <p>a. Provide the designed criteria for these lines;</p> <p>b. The type of poles installed;</p> <p>c. The ROW widths;</p> <p>d. Explain if these lines are designed to the latest NESC construction strength and overload factors; and</p> <p>e. Explain if any distribution line experienced damage but remained standing.</p>	<p>The City of Cuero's distribution system was not impacted by Hurricane Beryl or the May 2024 Derecho.</p> <p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p> <p>d) N/A</p> <p>e) N/A</p>	Wayne Berger, City Manager
1-63	<p>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.</p>	<p>The City of Cuero does not have an inventory of distribution poles that were in service prior to the May 2024 Derecho.</p>	Wayne Berger, City Manager
1-64	<p>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.</p>	<p>The City of Cuero did not have any distribution poles (zero) fail due to the May 2024 Derecho event.</p>	Wayne Berger, City Manager
1-65	<p>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.</p>	<p>The City of Cuero did not have any distribution poles (zero) fail due to Hurricane Beryl.</p>	Wayne Berger, City Manager
1-66	<p>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.</p>	<p>The City of Cuero did not have any distribution poles fail due to the May 2024 Derecho or Hurricane Beryl.</p>	Wayne Berger, City Manager

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?	The City of Cuero advocates the use of NESC construction standards.	Wayne Berger, City Manager
Section 5: Transmission Infrastructure		Response	Sponsor
1-68	Please explain your process for evaluating the hardening of transmission lines . If you file an annual storm hardening report under 16 TAC § 25.95, do not merely recite information provided in those filings. In your response, please include an explanation for the following: a. How frequently this evaluation is conducted? b. What criteria is utilized for this evaluation? c. When do you decide to harden transmission lines?	N/A. The City of Cuero does not own any transmission facilities or equipment.	Wayne Berger, City Manager
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.	N/A. The City of Cuero does not own any transmission facilities or equipment.	Wayne Berger, City Manager
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.	N/A. The City of Cuero does not own any transmission facilities or equipment.	Wayne Berger, City Manager
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.	N/A. The City of Cuero does not own any transmission facilities or equipment.	Wayne Berger, City Manager
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.	N/A. The City of Cuero does not own any transmission facilities or equipment.	Wayne Berger, City Manager
Section 6: Vegetation Management		Response	Sponsor
1-73	Provide the following information concerning your vegetation management staff : a. Provide the current size of your vegetation management staff . Your response should include a separate figure for full-time staff and independent contractors . b. Provide the average size of your vegetation management staff over the last 5 years . Your response should include a separate figure for full-time staff and independent contractors. c. Please explain how you determined the appropriate level of full-time vegetation management staff for each of the last 5 years . d. Provide the cost difference per circuit-mile between using contractors versus in-house vegetation management crews . e. Whether you retain an arborist as part of your permanent vegetation management staff or have an arborist consult with your vegetation management crews .	a) The City of Cuero does Electric Utility Department personnel conduct vegetation management in an ongoing manner. The City also utilizes a Vegetation Management contract service provider on an annual basis. These contract services target the City's main distribution circuits. The number of annual FTE's data is not maintained by the City. b) The number of annual FTE's data is not maintained by the City. c) The City of Cuero conducts vegetation management based on the view that vegetation management is a core function of the City's Electric Utility personnel job responsibilities. In addition to internal resources, the City establishes an annual budget for contracted vegetation management. d) The City had determined that it is cost effective to contract out vegetation management services. e) The City's vegetation management contractor has on arborist on staff to provide consulting and guidance as needed.	Wayne Berger, City Manager

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.	The City of Cuero utilizes clearance standards established by NESC for the minimum clearance standards for the City's distribution system which operates at 7,200 KV.	Wayne Berger, City Manager
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?	The City of Cuero does not have high customer count circuit segments.	Wayne Berger, City Manager
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.	The City of Cuero did not have impacted areas from the May 2024 Derecho or Hurricane Beryl.	Wayne Berger, City Manager
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?	No. The City does not have any areas that are considered "hurricane prone". The entire City of Cuero distribution system has a potential for hurricane and/or tropical storm damage.	Wayne Berger, City Manager
1-78	Please provide a list of the circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl , and provide the following information pertaining to the circuits identified: a. The name of the circuit(s); b. The date, time, and duration of the outage; c. The voltage of the circuit(s); d. A description of the cause of the outage; and e. The NERC category (Grow-In, Fall-In, Blow-In) associated with the outage.	The City of Cuero did not have any circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl, a) N/A b) N/A c) N/A d) N/A	Wayne Berger, City Manager
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.	The City of Cuero did not have any circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl,	Wayne Berger, City Manager
1-80	For the May 2024 Derecho and Hurricane Beryl, please provide the percentage of forced interruptions that were related to vegetation issues.	The City of Cuero did not have any circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl and therefore did not have any forced interruptions.	Wayne Berger, City Manager
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?	The City of Cuero did not have any circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl and therefore did not have any forced interruptions.	Wayne Berger, City Manager
1-82	When did you last substantively review, augment, or modify your vegetation management plan before July 8,2024?	The City's Vegetation Management Plan (VMP) is based on an annual budget for vegetation management with a scope of contracting for annual services that cover approximately 10-20% of the main distribution circuits each year.	Wayne Berger, City Manager
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.	The City of Cuero did not have any circuits that experienced a vegetation-related outage during the May 2024 Derecho and Hurricane Beryl and therefore did not have any forced interruptions.	Wayne Berger, City Manager
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.	The City of Cuero coordinates these issues with the City's vegetation management contractor and individual landowners. The City does not have a program or initiatives for this area.	Wayne Berger, City Manager

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.	The City of Cuero coordinates these issues with the City's vegetation management contractor and individual landowners. The City does not have a program or initiatives for this area.	Wayne Berger, City Manager
Section 7: Staffing and Mutual Assistance		Response	Sponsor
1-86	Please state whether you participated in or were a member of any mutual assistance programs on or before July 8, 2024. If yes: a. Please identify all mutual assistance programs you participated in or were a member of on that date; b. Please provide copies of any agreements entered as part of your membership or participation in those mutual assistance programs; c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.	The City of Cuero participates in the Municipal Electric Service Association (MESA), which includes a Mutual Assistance Directory, before July 8, 2024. a) MESA b) No Mutual Aid Agreements c) LCRA publishes a MESA Directory which lists all MOUs that participate in MESA.	Wayne Berger, City Manager
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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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?	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
1-91	Provide the following information concerning mutual assistance received in response to either the May 2024 Derecho or Hurricane Beryl: a. Identify all mutual assistance programs from which you requested assistance; b. Describe the specific assistance, including but not limited to the number of damage assessors, vegetation management crews, 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 191(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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives. a) N/A b) N/A c) N/A d) N/A	Wayne Berger, City Manager
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?	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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?	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager

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).	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
1-96	Please describe what specific actions you took to begin staging internal staff and any responsive mutual assistance crews or resources.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
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.	City of Cuero was not impacted by Hurricane Beryl and did not participate in any mutual assistance initiatives.	Wayne Berger, City Manager
Section 8: Mobile Generation		Response	Sponsor
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment. a) N/A b) N/A c) N/A d) N/A e) N/A f) N/A g) N/A h) N/A	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment. i) N/A j) N/A k) N/A l) N/A	Wayne Berger, City Manager
1-100	Provide the following information concerning your customer base:	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager

	<p>a. Total number of customers served by rate class;</p> <p>b. Average demand by rate class;</p> <p>c. Peak demand by rate class; and</p> <p>d. Net peak demand by rate class.</p>	<p>m) N/A</p> <p>n) N/A</p> <p>o) N/A</p> <p>p) N/A</p>	
1-101	Please provide information on the average customer density by circuit mile for the feeders in the Impacted Area.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment. a) N/A b) N/A c) N/A	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment. a) N/A b) N/A c) N/A d) N/A e) N/A	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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?	The City of Cuero has not leased or procured any mobile generation facilities or equipment. a) N/A b) N/A c) N/A d) N/A e) N/A	Wayne Berger, City Manager

	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?		
1-108	<p>Please provide the following information regarding drills, procedures, and plans to use mobile generation facilities.</p> <p>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.</p> <p>b. Did the TDU assign specific personnel to manage, either directly or indirectly, the operation and deployment of its mobile generation facilities?</p> <p>c. Did the TDU conduct personnel trainings or preparedness drills for the operation of its mobile generation facilities?</p> <p>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.</p>	<p>The City of Cuero has not leased or procured any mobile generation facilities or equipment.</p> <p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p> <p>d) N/A</p>	Wayne Berger, City Manager
1-109	<p>Please provide the following information regarding each mobile generation facility borrowed during Hurricane Beryl as part of a mutual assistance program or agreement.</p> <p>a. How the original request for mobile generation facilities through mutual assistance was made;</p> <p>b. The size, in MW, of each borrowed mobile generation facility;</p> <p>c. The date the mutual assistance program or agreement was entered;</p> <p>d. The date the borrowed mobile generation facility was deployed;</p> <p>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;</p> <p>f. The identity of the original owner or lessor of the mobile generation facility subject to the mutual assistance program or agreement; and</p> <p>g. Whether obtained mobile generation facilities were used during, or in power restoration efforts following, Hurricane Beryl.</p> <p>i. If the mobile generation facility was not deployed, provide an explanation as to why the mobile generation facility was not deployed; and</p> <p>ii. If the mobile generation facility was deployed, provide an explanation of how it was used.</p>	<p>The City of Cuero has not leased or procured any mobile generation facilities or equipment.</p> <p>a) N/A</p> <p>b) N/A</p> <p>c) N/A</p> <p>d) N/A</p> <p>e) N/A</p> <p>f) N/A</p> <p>g) N/A</p>	Wayne Berger, City Manager
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?	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager

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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
1-119	Please describe any obstacles that limited the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager
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.	The City of Cuero has not leased or procured any mobile generation facilities or equipment.	Wayne Berger, City Manager