



Filing Receipt

Filing Date - 2024-08-28 01:23:14 PM

Control Number - 56822

Item Number - 61

PROJECT NO. 56822

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

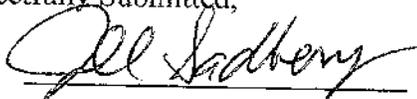
**NAVARRO COUNTY ELECTRIC COOPERATIVE'S RESPONSE TO COMMISSION
STAFF'S FIRST REQUEST FOR INFORMATION TO TARGETED ELECTRIC CO-
OPS
QUESTION NOS. STAFF 1-1 THROUGH 1-120**

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

Navarro County Electric Cooperative, Inc. (“_NCEC_”) files these responses to Commission Staff’s First Request for Information to Targeted Electric Co-ops, Question Nos Staff 1-1 through 1-120 (“Staff’s First RFIs to Co-ops”). Commission Staff directed that responses to Staff’s First RFIs to Co-ops be filed by August 30, 2024, thus these responses are timely filed. _NCEC stipulates that its responses may be treated by all parties as if they were filed under oath.

Dated: 8/28 2024,

Respectfully Submitted,



[insert signature block]

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;
- 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;
- c. A description as to how the drill conducted in 2024 differed materially from the previous annual drill;
- d. The identity of all third-party vendors that assisted in either conducting or preparations for the 2024 hurricane 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;
- 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;
- g. How performance during the 2024 hurricane drill was measured; and
- h. Any feed-back whether internally or externally from a third-party vendor or party invited to participate in the 2024 hurricane drill.

RESPONSE:

- a. Navarro County Electric Cooperative, Inc. conducted a table top drill for a major storm on June 27, 2024.
- b. Not applicable
- c. No material differences.
- d. None
- e. None
- f. None
- g. Not applicable
- h. Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Navarro County Electric Cooperative Inc. does not conduct hurricane drills, as we do not have facilities located within a hurricane evacuation zone, as defined by the Texas Department of Public Safety's Texas Division of Emergency Management.

Sponsor: Jill Sadberry, General Manager/CEO

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:

- a. How long would an actual storm be used to set the conditions for future hurricane drills?
- b. What hurricanes and major storms were used to set the conditions for the 2024 hurricane drill?

RESPONSE: Navarro County Electric Cooperative Inc. does not conduct hurricane drills, as we do not have facilities located within a hurricane evacuation zone, as defined by the Texas Department of Public Safety's Texas Division of Emergency Management

SPONSOR: Jill Sadberry, General Manager/CEO

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: None

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: Per our EOP, "Identifying Potentially Severe Weather Events, page 8, "Monitor Weather Alert Radio and report severe weather alerts from the National Weather Service."

SPONSOR: Jill Sadberry, General Manager/CEO

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: Approximately 5 days, depends on the projected Category, as we are too far north to expect damage by hurricanes.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: 4 days

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: NCEC does not have an outage tracker.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: NCEC did not initiate requests for mutual assistance, as we did not expect damage.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-10 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: NCEC uses direct phone calls, both in and outgoing; social media, specifically Facebook, and sending a field representative to the location.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-11 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: NCEC does not use an operating condition system.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-12 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.

STAFF 1-13 **RESPONSE:**

Emergency response assignments are detailed in the cooperative's EOP. Cooperative employees are alerted to potential severe weather conditions and plan accordingly for staffing should the severe weather condition occur. All Cooperative personnel are on 24 hour call during any emergency and may be called in to staff positions as needed. The General Manager/CEO will determine if mutual assistance is needed, and if so, will contact TEC. NCEC has verbal agreements with local hotels, restaurants and grocery stores for lodging and food.

SPONSOR: Jill Sadberry, General Manager/CEO

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: NCEC did not prepare in advance for the May 2024 Derecho or Hurricane Beryl events as we are too far north to expect damage.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: NCEC did not prepare in advance for the May 2024 Derecho or Hurricane Beryl events as we are too far north to expect damage.

SPONSOR: Jill Sadberry, General Manager/CEO

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: NCEC did not experience any outages during the May 2024 Derecho event.

NCEC's only outages during Hurricane Beryl were due to damage to an Oncor structure that serves Navarro. NCEC's distribution system experienced no damage as a result of Beryl.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: a. Not applicable

b. Not applicable

c. Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: None

SPONSOR: Jill Sadberry, General Manager/CEO

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?
- 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.

RESPONSE:

a. Local governments, community organizations and other utilities are included in our communications after a major storm.

b. No additional augmentation to staffing would occur. Overflow calls to our office are handled by our third party answering service.

c. Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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?
- 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?
- 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.
- f. What is the maximum call volume for the call centers or help desks that were available and in operation during or in the aftermath of Hurricane Beryl?

RESPONSE:

- a. We have 7 employees that take calls and a third party answering service.
- b. 100% full-time employees, zero contract labor, zero temporary/seasonal workers.
- c. We do not have a formal target wait time.
- d. We do not have a formal target resolution time for calls, but obviously asap.
- e. New hires are trained by existing employees.
- f. Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Calls are not recorded.

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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.
- b. The last date the software underpinning the outage tracker was updated.
- 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.
- d. Whether the outage tracker was mobile-friendly;
- e. the languages supported by the outage tracker;
- f. Whether the outage tracker captured circuit-specific or meter-specific information or both.
- g. Whether the outage tracker was cloud-based or operated through an on-premise server?
- h. The maximum number of simultaneous users the outage tracker was designed to accommodate.
- 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.
- j. The date of the last stress or load test of the outage tracker.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: per NCEC's EOP Communications Plan, page 7, 2.c: Special care will be given to loads such as: medical facilities, fire departments, community water systems, traffic and railroad signals, monitoring stations, cell towers, convenience stores, meat processing facilities, and gas production facilities.

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: : per NCEC's EOP Communications Plan, page 7, 2.c: "Special care will be given to loads such as: medical facilities, fire departments, community water systems, traffic and railroad signals, monitoring stations, cell towers, convenience stores, meat processing facilities, and gas production facilities." Frequency of communication is on a case by case basis.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Our EOP is our service restoration plan.

SPONSOR: Jill Sadberry, General Manager/CEO

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: Cooperative members call in to report an outage, we send crews to the area, they restore service as soon as possible, we then call the Member back and verify that their service is restored. Restoration crews are dispatched by area for efficient prioritization.

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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: No

SPONSOR: Jill Sadberry, General Manager/CEO

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.

RESPONSE: NCEC employes are not trained in Incident Command System processes. NCEC employes receive on the job training in emergency event management. The EOP is published for all to have and refer to in case of emergency.

SPONSOR: Jill Sadberry, General Manager/CEO

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:

- a. How frequently this evaluation is conducted;
- b. What criteria you utilize for this evaluation; and
- c. When you decide to replace the distribution pole.

RESPONSE:

- a. The cooperative hires contractors to inspect approximately 4000 poles per year. NCEC employees patrol line daily, visually inspecting poles.
- b. The criteria used for this evaluation is excessive cracking, holes, and decay below ground.
- c. Excessive cracking, holes and decay below ground will necessitate the pole being replaced.

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: NCEC minimum required ROW width for single phase is 20 feet. NCEC minimum required ROW for 3 phase is 30 feet.

SPONSOR: Jill Sadberry, General Manager/CEO

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:

- 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);
- e. NESC construction strength and overload factors the feeder is currently built to;
- f. Identify which feeders are in your plans to rebuild to a higher wind loading standard; and
- g. Provide an estimate for when identified rebuilds will commence.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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

- 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.

RESPONSE: NCEC does not have poles taller than 60 feet.

SPONSOR: Jill Sadberry, General Manager/CEO

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: NCEC is an RUS borrower. We follow the RUS Bulletin 1728F-803, pages 215 and 216 when setting poles. We have not changed our standard for pole embedment in the last 10 years.

SPONSOR: Jill Sadberry, General Manager/CEO

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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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

RESPONSE: NCEC follows the RUS Bulletin 1728F-803 construction specifications.

SPONSOR: Jill Sadberry, General Manager/CEO

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: NESC has not changed our construction standards or specifications.

SPONSOR: Jill Sadberry, General Manager/CEO

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:

- a. Provide the designed criteria for these lines;
- b. The type of poles installed;
- c. The ROW widths;
- d. Explain if these lines are designed to the latest NESC construction strength and overload factors; and
- e. Explain if any distribution line experienced damage but remained standing.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

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.

STAFF 1-64 **RESPONSE:** Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-65 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-66 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-67 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-68 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: No opinion. Not applicable to NCEC

SPONSOR: Jill Sadberry, General Manager/CEO

Transmission Infrastructure

STAFF 1-69 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?

RESPONSE: Not applicable. NCEC does not own transmission lines

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-70 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: : Not applicable. NCEC does not own transmission lines

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-71 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: : Not applicable. NCEC does not own transmission lines

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-72 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: : Not applicable. NCEC does not own transmission lines

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-73 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: : Not applicable. NCEC does not own transmission lines

SPONSOR: Jill Sadberry, General Manager/CEO

Vegetation Management

STAFF 1-74 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.

RESPONSE:

- a. NCEC has one ROW contractor, and one herbicide contractor. Our operations manager oversees the contractors.
- b. NCEC's ROW contractor averages 13 employees. The herbicide contractor averages 15 employees. Our operations manager oversees the contractors.
- c. NCEC plans for a five year system wide trim.
- d. Not applicable. NCEC has always used contractors to maintain our ROW.
- e. NCEC does not retain an arborist or have an arborist consult with our vegetation management contractors.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-75 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: : NCEC does not own transmission lines. Minimum clearance for Distribution power lines is 10 feet.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-76 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: : NCEC employees patrol power lines and report problematic vegetation.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-77 Please provide inspection logs and field reports from workers who performed VM services in the Impacted Area for the past five years.

RESPONSE: : Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-78 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: : Not applicable. NCEC is not located in a hurricane prone area.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-79 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.

RESPONSE: : Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-80 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: : Not applicable.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-81 For the May 2024 Derecho and Hurricane Beryl, please provide the percentage of forced interruptions that were related to vegetation issues.

RESPONSE: : Not applicable.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-82 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: : Not applicable.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-83 When did you last substantively review, augment, or modify your vegetation management plan before July 8, 2024?

RESPONSE: : NCEC increased the annual tree trimming budget in 2021.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-84 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: : Not applicable.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-85 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: : NCEC will contact property owners, and ask permission to cut potentially hazardous vegetation.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-86 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: : NCEC outside service employees number 20 to 21. All of the outside employees are trained to recognize and report vegetation problems and hazards.

SPONSOR: Jill Sadberry, General Manager/CEO

Staffing and Mutual Assistance

STAFF 1-87 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; and
- c. Please provide a list of members or participants for each mutual assistance program you are a member or participant in.

RESPONSE:

- a. NCEC is a member of the Texas Electric Utilities Mutual Aid Agreement.
- b. Copy attached.
- c. List of members attached.

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-88 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-89 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

MUTUAL AID AGREEMENT

In consideration of the mutual commitments given herein, each of the Signatories to this Mutual Aid Agreement agrees to render aid to any of the Signatories as follows:

1. Request for aid. The Requesting Signatory agrees to make its request in writing to the Aiding Signatory within a reasonable time after aid is needed and with reasonable specificity. The Requesting Signatory agrees to compensate the Aiding Signatory as specified in this Agreement and in other agreements that may be in effect between the Requesting and Aiding Signatories.
2. Discretionary rendering of aid. Rendering of aid is entirely at the discretion of the Aiding signatory. The agreement to render aid is expressly not contingent upon a declaration of a major disaster or emergency by the federal government or upon receiving federal funds.
3. Invoice to the Requesting Signatory. Within 90 days of the return to the home work station of all labor and equipment of the Aiding Signatory, the Aiding Signatory shall submit to the Requesting Signatory an invoice of all charges related to the aid provided pursuant to this Agreement. The invoice shall contain only charges related to the aid provided pursuant to this Agreement.
4. Charges to the Requesting Signatory. Charges to the Requesting Signatory from the Aiding Signatory shall be as follows:
 - a) Labor force. Charges for labor force shall be in accordance with the Aiding Signatory's standard practices.
 - b) Equipment. Charges for equipment, such as bucket trucks, digger derricks, and other special equipment used by the aiding Signatory, shall be at the reasonable and customary rates for such equipment in the Aiding Signatory's locations.
 - c) Transportation. The Aiding Signatory shall transport needed personnel and equipment by reasonable and customary means and shall charge reasonable and customary rates for such transportation.
 - d) Meals, lodging and other related expenses. Charges for meals, lodging and other expenses related to the provision of aid pursuant to this Agreement shall be the reasonable and actual costs incurred by the Aiding Signatory.
5. Counterparts. The Signatories may execute this Mutual Aid Agreement in one or more counterparts, with each counterpart being deemed an original Agreement, but with all counterparts being considered one Agreement.
6. Execution. Each party hereto has read, agreed to and executed this Mutual Aid Agreement on the date indicated.

Date July 8, 2024 Entity Navajo Co Electric Cooperative Inc
By Bill Sadberry
Title GM / CEO

Cooperative	Contact	Daytime	Nighttime	Email
Bailey County ECA	Black, Kim	(806) 272-4504	(806) 946-6574	kblack@bcecoop.com
Bandera EC	BEC Control Center	(830) 796-6062	(830) 796-6062	dispatcher@banderaelectric.com
		(830) 796-6001	(830) 796-6001	
Bartlett EC	Sanders, Daniel	(254) 527-3551	(512) 202-6854	dsanders@bartlett.ec.coop
Big Country EC	Duniven, Will	(325) 776-3826	(325) 721-6026	wduniven@bigcountry.coop
Bluebonnet EC	Ellis, Rachel	(512) 332-7929	(979) 219-1689	rachel.ellis@bluebonnet.coop
Bowie-Cass EC	Boyd, Mark	(903) 748-2338	(903) 748-2338	markb@bceec.com
Brazos EPC	Brazos System Operations Center	(254) 750-6260	(254) 750-6260	sysop@brazoselectric.com
Bryan Texas Utilities	BTU System Operator	(979) 821-5835	(979) 821-5835	gmifler@btutilities.com
Central Texas EC	Hinojosa, Atanacio "Tachi"	(830) 997-2126	(830) 307-2997	ahinojosa@ctec.coop
Cherokee County ECA	Bauer, Bart	(903) 683-2248	(903) 625-0514	bartb@cceca.net
Coleman County EC	Mendoza, Benny	(325) 625-2128	(325) 214-0141	benny@colemanelectric.org
Comanche EC	Lesley, Alan	(254) 842-8036	(254) 842-8036	alesley@ceca.coop
Concho Valley EC	Watson, David	(325) 655-6957	(325) 277-0482	dwatson@cvec.coop
CoServ Electric	Hassell, Shea	(940) 321-7874	(940) 395-4665	shassell@coserv.com
Deaf Smith EC	Beltran, Johnny IV	(806) 584-1128	(806) 344-6167	jbeltran@deafsmith.coop
Deep East Texas EC	Wood, Bryan	(936) 229-4000	(936) 596-9617	bryanw@deepeast.com
East Texas EC	Goff, A.J.	(936) 560-9532	(936) 569-4030	ajg@gtpower.com
Fannin County EC	Shinpaugh, John Ed	(903) 583-2117	(903) 583-2117	jshinpaugh@fanninec.coop
Farmers EC, NM	Bass, Barry	(575) 799-1382	(575) 799-1382	barry@fecnm.org
Farmers EC, TX	Green, Brian	(903) 453-0547	(903) 450-5513	bgreen@farmerselectric.coop
Fayette EC	Nietsche, Gary Don	(979) 249-6593	(979) 249-6593	garyn@fayette.coop
Fort Belknap EC	Harvey, Jeff	(940) 564-3526	(940) 564-2343	harv109@brazosnet.com
Golden Spread EC	Hollandsworth, Kari	(806) 379-7766	(806) 418-3249	khollandsworth@gsec.coop
Grayson-Collin EC	McGinnis, David	(903) 815-7308	(903) 815-7308	david.mcginnis@grayson-collin.coop
Greenbelt EC	Bond, Ricky	(806) 216-0638	(806) 216-0638	ricklbond@hotmail.com
Guadalupe Valley EC	Land, Zach	(210) 705-3332	(210) 705-3332	zland@gvec.org
Hamilton County ECA	Lasater, Cody	(254) 386-3123	(254) 386-7845	cody.lasater@hamiltonelectric.coop
Harmon EA	Worthen, Monty	(580) 688-3342	(580) 688-3342	mworthen@harmonelectric.com
Heart of Texas EC	Johnson, Neil	(254) 840-5103	(254) 644-3352	neil@hotec.coop
HILCO EC	Cheek, Thomas	1-800-338-6425 ext. 1196	(254) 337-0363	tcheek@hilco.coop
		(936) 852-7261	(936) 545-5410	mlane@houstoncountyelec.com
Houston County EC	Lane, Mike	(940) 895-3311	(940) 636-9236	swiley@jacelectric.com
J-A-C EC	Wiley, Shane	(361) 771-4400	(979) 479-9039	jcoleman@myjec.coop
Jackson EC	Coleman, Jim	(409) 981-1926	(409) 382-3043	aaron@jnec.com
Jasper-Newton EC	Crawford, Aaron	(830) 631-8012	(325) 669-0577	ehalfmann@karnesec.org
Karnes EC	Halfmann, Eric	(903) 495-2714	(903) 495-2714	bryan@lamarelectric.coop
Lamar EC	Story, Bryan	(806) 385-5191	(806) 759-1594	bmoore@lcec.coop
Lamb County EC	Moore, Blake	(575) 396-3631	(575) 361-6277	bferris@lccenet.com
Lea County EC	Ferris, Bobby	(806) 983-2814	(806) 983-2203	dannyn@lighthouse.coop
Lighthouse EC	Nixon, Dan	(512) 730-6556	1-866-527-2267	oem@lcra.org
LCRA	Hibbs, Mitch	(512) 730-6557	(512) 730-6322	oem@lcra.org
	Moore-Guajardo, Stacy	(806) 561-4588	(806) 470-8628	smay@lyntegar.coop
Lyntegar EC	May, Slate	(956) 903-3030	(956) 463-5571	vmacias@magicvalley.coop
Magic Valley EC	Macias, Vince	(210) 260-7127	(210) 260-7127	leonardg@medinaec.org
Medina EC	Geyer, Leonard	(979) 220-5898	(936) 349-0855	dwilliams@midsouthsynergy.com
MidSouth EC	Williams, David "Bo"	(903) 874-7411	(903) 654-8144	mlawrence@navarroec.com
Navarro County EC	Lawrence, Mike	ext. 112		
Navasota Valley EC	Huggins, Warren	(979) 828-6426	(903) 268-7878	whuggins@navasotavalley.com
North Plains EC	Roberts, Jennifer	(806) 435-5482	(806) 228-5665	jroberts@npec.org
		(806) 228-5665		
Nueces EC	Irani, Varzavand	(361) 767-7380	(361) 533-2862	varzavand@nueceselectric.org
Panola-Harrison EC	White, Sam	(903) 935-1540	(903) 926-4694	swhite@phec.us
		ext. 217		
Pedernales EC	Perez, Jesus "Tony"	(830) 992-1363	(830) 992-1363	jesus.perez@peci.com
PenTex Energy	Hesse, Neil	(940) 759-5120	(940) 736-4764	neil.hesse@pentex.com
Rayburn Country EC	Rayburn System Operator	(469) 402-2050	(469) 402-2050	sysops@rayburnelectric.com
Rio Grande EC	Quiroz, Theresa	(830) 563-2444	(830) 563-7456	tquiroz@rgec.coop
Rita Blanca EC	Howell, Tracy	(806) 249-4506	(806) 282-6636	thowell@rbec.coop
Rusk County EC	Dispatch	(903) 657-4571	(903) 657-4571	zach@rcelectric.org
Sam Houston EC	Turk, Doug	(936) 328-1212	(936) 425-1907	dturk@samhouston.net
San Bernard EC	Jouett, James	(979) 865-3171	(979) 877-9905	jjouett@sbec.org
San Miguel EC	Courter, Craig	(830) 784-3411	(830) 560-0300	ccourter@smeci.net
		ext. 202		

San Patricio EC	Hughes, Ron	(361) 364-2220 ext. 117	(361) 362-4843 (361) 319-4043	rhughes@sanpatricio electric.org
South Plains EC	Bailey, Randal	(806) 787-9099	(806) 787-9099	rbailey@spec.coop
South Texas EC	Lange, Clif	(361) 575-6491	(361) 575-6491	clif@stec.org
SW Arkansas EC	Fenton, Bobby	(870) 772-2743	(903) 826-1076	bfenton@swrea.com
SW Rural EA	Jeff Simpson	1-800-256-7973	(580) 591-1446	jsimpson@swre.com
SW Texas EC	Whitten, William "Buff"	(325) 853-2544	(325) 206-0118 (325) 853-1901	wwhitten@swtec.com
Swisher EC	Cruz, Henry	(806) 995-3567	(806) 869-5131	hcruz@swisherec.org
Taylor EC	Bartlett, Ryan	(325) 793-8500	(325) 793-8500	ryan.bartlett@taylorelectric.coop
Tri-County EC, TX	Rehberg, Janet	(817) 444-3201	(918) 361-8777	cco_office@tcectexas.com
Tri-County EC, OK	Perkins, Zac	(580) 652-3855	(580) 461-9055	zperkins@tcec.coop
Trinity Valley EC	Watson, Tony	(469) 376-2252	(903) 681-9110	watson@tvec.coop
United Co-op Services	Howard, Quentin	(254) 918-6127	(817) 253-5406	quentin@ucs.net
Upshur Rural ECC	Walker, Robert A. Jr.	(903) 680-0299	(903) 841-8127	rwalker@urecc.coop
Victoria EC	Warzecha, Blaine B.	(361) 652-3437	(361) 652-3437	bwarzecha@victoriaelectric.coop
Western Farmers EC	System Operators	(405) 247-4570	(405) 247-4570	transops@wfec.com
Wharton County EC	Raybon, Gary L.	(979) 543-6271	(979) 332-2264	raybon@mywcec.coop
Wise EC	Cantwell, Rayce	1-888-627-9326	(940) 393-2245	rcantwell@wiseec.com
Wood County EC	Steward, Ramon	(903) 638-1100	(903) 638-1100	ramons@wcec.org

STAFF 1-90 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-91 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-92 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, linemen, 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-93 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-94 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-95 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-96 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-97 Please describe what specific actions you took to begin staging internal staff and any responsive mutual assistance crews or resources.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-98 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: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

Mobile Generation

STAFF 1-99 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-100 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-101 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-102 Please provide information on the average customer density by circuit mile for the feeders in the Impacted Area.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-103 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-104 Please describe the specific use cases contemplated by the TDU before executing a contract for the lease or procurement of mobile generation facilities.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-105 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-106 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-107 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-108 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?

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-109 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-110 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 in 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-111 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?

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-112 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-113 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-114 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 1-115 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 **RESPONSE:** Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-117 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-118 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-119 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-120 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-121 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-122 Please describe any obstacles that limited the deployment of mobile generation facilities during, or in response to, Hurricane Beryl.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO

STAFF 1-123 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.

RESPONSE: Not applicable

SPONSOR: Jill Sadberry, General Manager/CEO