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PUC DOCKET NO. 56822

**INVESTIGATION OF EMERGENCY
PREPAREDNESS AND RESPONSE BY
UTILITIES IN HOUSTON AND
SURROUNDING COMMUNITIES**

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**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

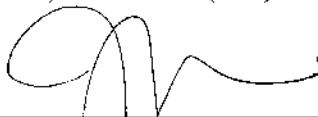
**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

MSEC Enterprises, Inc. and MSEC Wastewater, Inc. (MSEC) files this Response to the First Request for Information (RFI) filed by the Staff (Staff) of the Public Utility Commission of Texas (Commission) to Targeted Water and Sewer Utilities. Pursuant to 16 Texas Administrative Code (TAC) § 22.144(c)(2)(F), these responses may be treated as if they were filed under oath.

Respectfully submitted,

**LLOYD GOSSELINK ROCHELLE
& TOWNSEND, P.C.**

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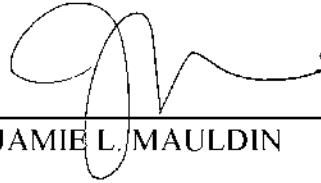
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**ATTORNEYS FOR MSEC ENTERPRISES,
INC. AND MSEC WASTEWATER, INC.**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on August 29, 2024, in accordance with the Order Suspending Rules, issued in Project No. 50664.



A handwritten signature in black ink, appearing to read 'J. Mauldin', is positioned above a solid horizontal line. The signature is fluid and cursive.

JAMIE L. MAULDIN

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
RESPONSE TO STAFF'S FIRST RFI**

STAFF 1-1 Please provide your CCN number and identify the counties you serve that were included in Acting Governor Dan Patrick's July 6, 2024 amended disaster declaration.

RESPONSE: MSEC Enterprises Inc. - Water CCN No. 12887 serving portions of Montgomery and Grimes Counties.

MSEC Wastewater, Inc. - Wastewater CCN No. 20984 serving portions of Montgomery County.

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Sponsored by: Kerry Kelton

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-2 Please provide the public water system identification number and number of connections served by that water system in each of the counties identified in the response to Staff 1-1.

RESPONSE: Crown Ranch Water System PWS ID No. 1700781 – Montgomery County (186 Connections), Grimes County (80 Connections)

Montgomery Trace Water System PWS ID No. 1700638 – Montgomery County (7,799 Connections)

Stillwater Estates Water System PWS ID No. 1700677 – Montgomery County (41 Connections)

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-3 Please indicate the date and duration of any extended power outage lasting more than 24 hours you experienced due to the May 2024 Derecho or Hurricane Beryl and whether the extended power outage caused a disruption to water and sewer services.

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. did not experience any electrical service outages during the May 2024 Derecho. MSEC Enterprises, Inc. and MSEC Wastewater, Inc. did experience service outages from Mid-South Electric Cooperative Association and Entergy Texas, Inc. for periods lasting more than 24 hours during Hurricane Beryl as detailed below. By utilizing permanently installed onsite standby generation at each facility, MSEC Enterprises, Inc. and MSEC Wastewater, Inc. experienced no service interruptions to its customers.

Hurricane Beryl

Crown Ranch Water System (PWS ID No. 1700781)

Crown Ranch Water Plant 1 (Electric provider: Entergy Texas, Inc.) lost power from July 8 to July 12, 2024 (94 total hours)

Crown Ranch Water Plant 2 (Mid-South Electric Cooperative Association) lost power from July 8 to July 11, 2024 (74 total hours)

Montgomery Trace Water System (PWS ID No. 1700638) (Electric provider: Mid-South Electric Cooperative Association)

Fairwater Water Plant lost power from July 8 to July 11, 2024 (77 total hours)

Highland Ranch Water Plant lost power from July 8 to July 10, 2024 (47 total hours)

Lake Forest Lodge Water Plant lost power from July 8 to July 10, 2024 (53 total hours)

MISD Water Plant lost power from July 8 to July 11, 2024 (77 total hours)

Water Plant 1 lost power from July 8 to July 8, 2024 (7 total hours)

Water Plant 2 lost power from July 8 to July 8, 2024 (7 total hours)

Water Plant 3 lost power from July 8 to July 8, 2024 (7 total hours)

Water Plant 5 lost power from July 8 to July 8, 2024 (11 total hours)

Water Plant 6 lost power from July 8 to July 10, 2024 (47 total hours)

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Stillwater Estates Water System (PWS ID No. 1700677) (Electric provider: Mid-South Electric Cooperative Association) lost power from July 8 to July 11, 2024 (72 total hours)

MSEC WWTP No. 1 (TX0136191) (Electric provider: Mid-South Electric Cooperative Association) from July 8 to July 11, 2024 (77 total hours)

MSEC WWTP No. 2. (TX0136191) (Electric provider: Mid-South Electric Cooperative Association) lost power from July 8 to July 11, 2024 (77 total hours)

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-4 Please provide the following information, categorized by public water system, concerning any water or sewer service interruptions during either the May 2024 Derecho or Hurricane Beryl:

- a. The duration of the water or sewer service outage
- b. The percentage of customers impacted by the service interruptions;
- c. The cause of the interruption(s), if known;
- d. If the interruption(s) was caused by an extended power outage, the identity of your electric utility;
- e. The duration of any required notices (e.g., boil water notices) issued due to the extended power outage; and
- f. A summary of efforts undertaken to restore water and sewer services.

RESPONSE:

- a. None of MSEC Enterprises, Inc. and MSEC Wastewater, Inc. facilities lost power during the May 2024 Derecho. There were no interruptions to water or sewer services.
- b. All MSEC Enterprises, Inc. and MSEC Wastewater, Inc. facilities ran on backup standby generators during extended power outages associated with Hurricane Beryl. There were no interruptions to water or sewer services and therefore no customers were affected.
- c. MSEC Enterprises, Inc. and MSEC Wastewater, Inc. experienced zero service interruptions during either event.
- d. This is not applicable because MSEC Enterprises, Inc. and MSEC Wastewater, Inc. experienced zero service interruptions during either event.
- e. This is not applicable because MSEC Enterprises, Inc. and MSEC Wastewater, Inc. experienced zero service interruptions during either event and therefore did not have to issue any boil water notices.
- f. This is not applicable because MSEC Enterprises, Inc. and MSEC Wastewater, Inc. experienced zero service interruptions during either event and therefore did not have to restore services.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-5 Please provide a detailed description of efforts taken to alert or communicate with your customers concerning required notices (e.g. boil water notices), extended power outages, or duration of Interruptions to water or sewer services caused by either the May 2024 Derecho or Hurricane Beryl

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. were not required to issue any required notices during the May 2024 Derecho or Hurricane Beryl. Standard treatment practices at the plants were accomplished during extended power outages during Hurricane Beryl utilizing permanently installed onsite backup standby generators at the facilities. Adequate pressure was also maintained throughout the water distribution system.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-6 What coordination, if any, did you have with other local governments to notify customers about the duration of service outages or efforts taken to restore service due to the extended power outage?

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. did not have a need to communicate with local governments because all systems remained operational due to onsite standby backup generation during hurricane Beryl and no outages were experienced during the May 2024 Derecho.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-7 Please provide a copy of your current emergency preparedness plan and identify the page or section numbers that were activated during the May 2024 Derecho or Hurricane Beryl

RESPONSE: A copy of MSEC Enterprises, Inc. and MSEC Wastewater, Inc.'s emergency preparedness plans are filed confidentially in Project 52272. This question is not applicable to the May 2024 Derecho because no outages were experienced. Page and section numbers activated during Hurricane Beryl are listed below.

Crown Ranch Water System (1700781): Page 8, Option 1

Montgomery Trace Water System (1700638): Page 10, Option 1

Stillwater Estates Water System (1700677): Page 7 Option 1

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-8 If you are an “affected utility” as defined under Texas Water Code (TWC) §13.1395, please indicate how your utility complied with the requirements of TWC §13.1395(c).

- a. If you have been granted a waiver under TWC § 13.1395(j), please provide a copy of that waiver.
- b. If your emergency preparedness plan contemplated the use of portable generators, please indicate if the generators were owned by the utility, obtained through mutual aid agreements, or shared with other affected utilities.

RESPONSE: MSEC Enterprises, Inc. utilized onsite automatic starting/transferring auxiliary generators.

- a. This is not applicable. MSEC Enterprises, Inc. was not granted a waiver.
- b. All portable generators utilized in the water systems’ respective emergency preparedness plans are owned by MSEC Enterprises, Inc. The generators were not shared with any other utilities.

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STAFF 1-9 If you are an 'affected utility as defined under TWC § 13.1394 or 13.1395, provide the date you filed information identified under TWC § 13.1396(c) with applicable electric utilities and retail electric providers.

RESPONSE: As required by TWC § 13.1396(c), Mid-South Electric Cooperative Association was notified on September 23, 2021. Mid-South Electric Cooperative Association serves all MSEC Enterprises, Inc. water plants except for Crown Ranch Water Plant 1.

As required by TWC § 13.1396(c), Entergy Texas, Inc. was notified on October 1, 2021. Entergy Texas, Inc. only serves Crown Ranch Water Plant 1 located in Montgomery County.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-10 Do you perform your own hurricane or major storm drills? If you do not, please provide a brief explanation of what your utility would need to start conducting these drills. If you do, please provide the following information:

- a. The frequency of drills;
- b. The date of the last drill;
- c. A description of the category of the hurricane drilled and any conditions used in that drill;
- d. The names of any governmental entities, community organizations, or other local groups that were invited to participate in the drill and their level of involvement with the drill; and
- e. The names of any electric, water, sewer, or telecommunication utilities that were invited to participate in the drill and their level of involvement with the drill.

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. do not participate in their own drill because MSEC Enterprises, and MSEC Wastewater, Inc. participate in an Emergency Operations Plan (EOP) drill with their parent company, Mid-South Electric Cooperative Association, as further described in question 1-11 below. This collaborative effort allows all companies to be aware of what the other will do in the event of an emergency.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-11 Were you asked to participate in a hurricane or major storm drill conducted by or for an electric, water, sewer, or telecommunication utility in 2024? If yes, please provide the following information:

- a. The name(s) of the requesting utility;
- b. The date of the drill(s);
- c. Information concerning the category of hurricane(s) drilled and any conditions used in the drill(s);
- d. A description of your role and level of participation in the hurricane or major storm drill; and
- e. A description of any feedback given during a post-drill review.

RESPONSE:

- a. Mid-South Electric Cooperative Association
- b. May 14, 2024
- c. Mid-South Electric Cooperative Association conducted a tabletop exercise that included a roundtable discussion covering the Cooperative's EOP in the event of a major hurricane, cybersecurity incident, or other extended outage event. The tabletop exercise included an extended discussion and practical exercise in which a mock cyber attack was presented and discussed.
- d. As part of the discussion, MSEC Enterprises, Inc. and MSEC Wastewater, Inc. discussed how the facilities would maintain adequate treatment and pressure utilizing onsite generators and, if necessary, backup portable generators. In addition, communication strategies were discussed between the cooperative and water / wastewater facility management and staff.
- e. Feedback was given by the Cooperative about how the Cooperative would communicate and coordinate before, during, and after a major event.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-12 Did you regularly track hurricanes or major storms that could affect your service territory before July 8, 2024. If yes, please provide a description of how you tracked storms.

RESPONSE: As a utility located near the Gulf coast of Texas, MSEC Enterprises, Inc. and MSEC Wastewater, Inc. regularly track hurricanes and major storms that could affect our territory. Tracking is done through our parent company's (Mid-South Electric Cooperative Association's) System Operations Department. The Department begins tracking hurricanes as soon as they enter the Gulf of Mexico or as they develop within the Gulf of Mexico. The Department will issue alerts to MSEC Enterprises, Inc. and MSEC Wastewater, Inc. management and key personnel. Communications about tracking are done via email, Microsoft Teams, telephone, and in person as appropriate.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-13 Do you plan on conducting hurricane or major storm tracking in the future as a result of Hurricane Beryl?

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. actively track all hurricanes and major storms (including those prior to Hurricane Beryl). We will continue to track hurricanes and major storms in coordination with Mid-South Electric Cooperative Association management and staff.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-14 Please provide the date you were contacted by Texas Department of Emergency Management before the May 2024 Derecho and Hurricane Beryl.

RESPONSE: No contact was made by the Texas Department of Emergency Management before the May 2024 Derecho.

Prior to Hurricane Beryl's landfall, the Texas Department of Emergency Management contacted MSEC Enterprises, Inc. and MSEC Wastewater, Inc. leadership team on July 6, 2024, via email. MSEC Enterprises, Inc. and MSEC Wastewater, Inc. leadership team also participated in a Texas Department of Management Hurricane Beryl situational awareness call on July 7, 2024.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-15 Please describe any coordination calls or meetings with electric, water, sewer, or telecommunication utilities in which you participated in advance of Hurricane Beryl.

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. actively communicated with Mid-South Electric Cooperative Association management and staff in advance of Hurricane Beryl. In addition, MSEC Enterprises, Inc. and MSEC Wastewater, Inc. actively communicated with our broadband provider, MSEC Communications, LLC to ensure plans were in place in case of loss of communications (fiber optic networks to each facility). Initial contact occurred on July 5, 2024, from both utilities via email. Additionally, communications pre-storm occurred via phone call, text messaging, Microsoft Teams meetings, and email leading up to and during the hurricane's impact to the area.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-16 Were you provided access to a priority call list from the electric utility(s) for your service area?

RESPONSE: We were not provided access to a priority call list from Entergy Texas, Inc. However, as a wholly owned subsidiary of Mid-South Electric Cooperative Association, we did have full access and priority to relevant staff, if necessary.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-17 How many days before Hurricane Beryl's landfall were you contacted by your electric utility concerning the potential of an extended power outage associated with Hurricane Beryl?

RESPONSE: Mid-South Electric Cooperative Association contacted MSEC Enterprises, Inc. and MSEC Wastewater, Inc. management 3 days prior to Hurricane Beryl's landfall concerning the potential of an extended power outage.

No contact was made prior to Hurricane Beryl's landfall concerning potential extended power outages by Entergy Texas, Inc.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-18 Were you invited to participate in daily calls with your electric utility during the May 2024 Derecho or Hurricane Beryl?

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. management participated in daily calls or Microsoft Teams meetings with Mid-South Electric Cooperative Association management and staff for both storm events.

Entergy Texas, Inc. did not invite MSEC Enterprises, Inc. or MSEC Wastewater, Inc. management to participate in daily calls for either storm event.

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**MSEC ENTERPRISES, INC AND MSEC WASTEWATER, INC.'S RESPONSE TO
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STAFF 1-19 What preventative actions were taken by the utility after receiving notice of a potential extended power outage caused by the May 2024 Derecho or Hurricane Beryl?

RESPONSE: MSEC Enterprises, Inc. and MSEC Wastewater, Inc. perform a visual inspection on its generators every week and they are load tested on a monthly basis. A third party vendor does a quarterly inspection on all generators and services them annually. Generators are inspected in compliance with NFPA 110 Standard for Emergency and Standby Power Systems.

MSEC Enterprises, Inc. does daily inspections of its water plants and MSEC Wastewater, Inc. plants are checked five days a week in accordance with discharge permit requirements.

Before Hurricane Beryl, MSEC Enterprises, Inc. and MSEC Wastewater, Inc management and staff conducted site walk throughs of each facility. During the site walk throughs, management and staff ensured all onsite auxiliary generator fuel tanks were full and the generators were in good working condition. Additionally, chemical supply (chlorine and polyphosphate) levels were checked to ensure adequate treatment during an extended power outage could be achieved to protect public health. Pumps and motors were also checked and extra supplies that may be needed for repairs were staged for potential dispatch if necessary. Staff were also briefed on communication protocols during major storm events.

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