



Control Number: 57057



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PUBLIC UTILITY COMMISSION
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OPEN MEETING COVER SHEET COMMISSIONER MEMORANDUM

MEETING DATE: April 24, 2025

DATE DELIVERED: April 23, 2025

AGENDA ITEM NO.: 24

CAPTION: Docket No. 57057; SOAH Docket No. 473-25-01921 – Application of AEP Texas Inc. for Approval of a System Resiliency Plan

DESCRIPTION: Commissioner Courtney Hjaltman Memorandum

Public Utility Commission of Texas

Commissioner Memorandum

TO: Chairman Thomas Gleeson
Commissioner Kathleen Jackson

FROM: Commissioner Courtney K. Hjaltman *CKH*

DATE: April 23, 2025

RE: April 24, 2025 Open Meeting – Item No. 24
Docket No. 57057 – *Application of AEP Texas Inc. for Approval of a System Resiliency Plan*

Before the Commission is a corrected proposed order that recommends approval of AEP Texas’s system resiliency plan, as modified by the parties’ agreement. After our discussion at the last open meeting and on further review, I recommend changes to the proposed order as discussed below.

Annual Reporting

In its application, AEP Texas states that it has already commenced work to fully trim vegetation for circuits included in Measure Four, Vegetation Trimming.¹ Therefore, I recommend that AEP Texas report the expenses approved for Measure Four incurred to date. To accomplish this, I recommend adding a new finding of fact.

XX. It is appropriate for AEP Texas to include in its annual report any approved system resiliency plan expenses for Measure Four that were incurred before the system resiliency plan was approved.

Evaluation Metrics

AEP Texas contracted with 1898 & Co. to propose accelerated infrastructure hardening in its five measures explained in the system resiliency plan as well as evaluation metrics that were later augmented in the agreement with intervening parties. I respect the parties’ efforts to refine the evaluation metrics, and further propose that, given that AEP Texas’s service area is spread across different geographic regions, and AEP Texas’ proposed prioritization of certain regions over other, that the evaluation metrics for Measures One through Five be modified to be tracked by region. To accomplish this, I recommend adding a new finding of fact.

XX. It is appropriate for AEP Texas to report the results of its information tracking concerning project execution and the results of its activities including its evaluation of the efficacy of its activities on a regional basis.

¹ AEP Texas’s Petition for Approval of a System Resiliency Plan, Attachment A at 3-4 (Sept. 25, 2024).

With respect to Measure 5 specifically, AEP Texas and 1898 & Co. very thoughtfully divided AEP's service-delivery area into wildfire mitigation zones (WMZ), and, during settlement negotiations mentioned above, the wildfire mitigation investment was restricted to these WMZs by the parties (versus the entire service delivery area). In the Commission's Open Meeting on April 3rd, representatives of AEP Texas discussed in testimony with me the difficulty of evaluating this measure against wildfires prevented, trying to predict what never happened.² The system resiliency plan³ as filed, as well as the parties' agreement,⁴ mention numerous datapoints to be collected, and I believe this information will be useful; however, I want to make sure data is collected on all wildfires affecting AEP Texas' service area regardless of who caused them or whether they were caught by the technologies proposed in the system resiliency plan.

To better depict the success of these technologies when evaluating Measure Five, I recommend adding a new finding of fact.

XX. It is appropriate for AEP Texas to include in its annual report evaluation for Measure Five data on all wildfires affecting facilities in its service-delivery area regardless of whether they were detected by a program described in the system resiliency plan.

To reflect these additional findings of fact, I recommend that ordering paragraph 4 be modified accordingly.

4. AEP Texas must comply with all reporting requirements set forth in 16 TAC § 25.62(g) and Findings of Fact 35, XX, XX, and XX and utilize the evaluation metrics and criteria described in Findings of Fact 35, XX, and XX for its proposed system resiliency plan.

Finally, the Commission should delegate to the Office of Policy and Docket Management staff the authority to modify the order to conform to the *Citation and Style Guide for the Public Utility Commission of Texas* and to make other non-substantive changes to the order for such matters as capitalization, spelling, grammar, punctuation, style, correction of numbering, and readability.

I look forward to discussing this matter with you at the open meeting.

² Open Meeting Tr. at 78:19-80:5 (Apr. 3, 2025).

³ *Id.* at 25-38 (Sept. 25, 2024).

⁴ Unopposed Stipulation and Settlement Agreement and Agreed Motion to Admit Evidence and Remand Proceeding, Exhibit A at 6-7 (January 17, 2025).