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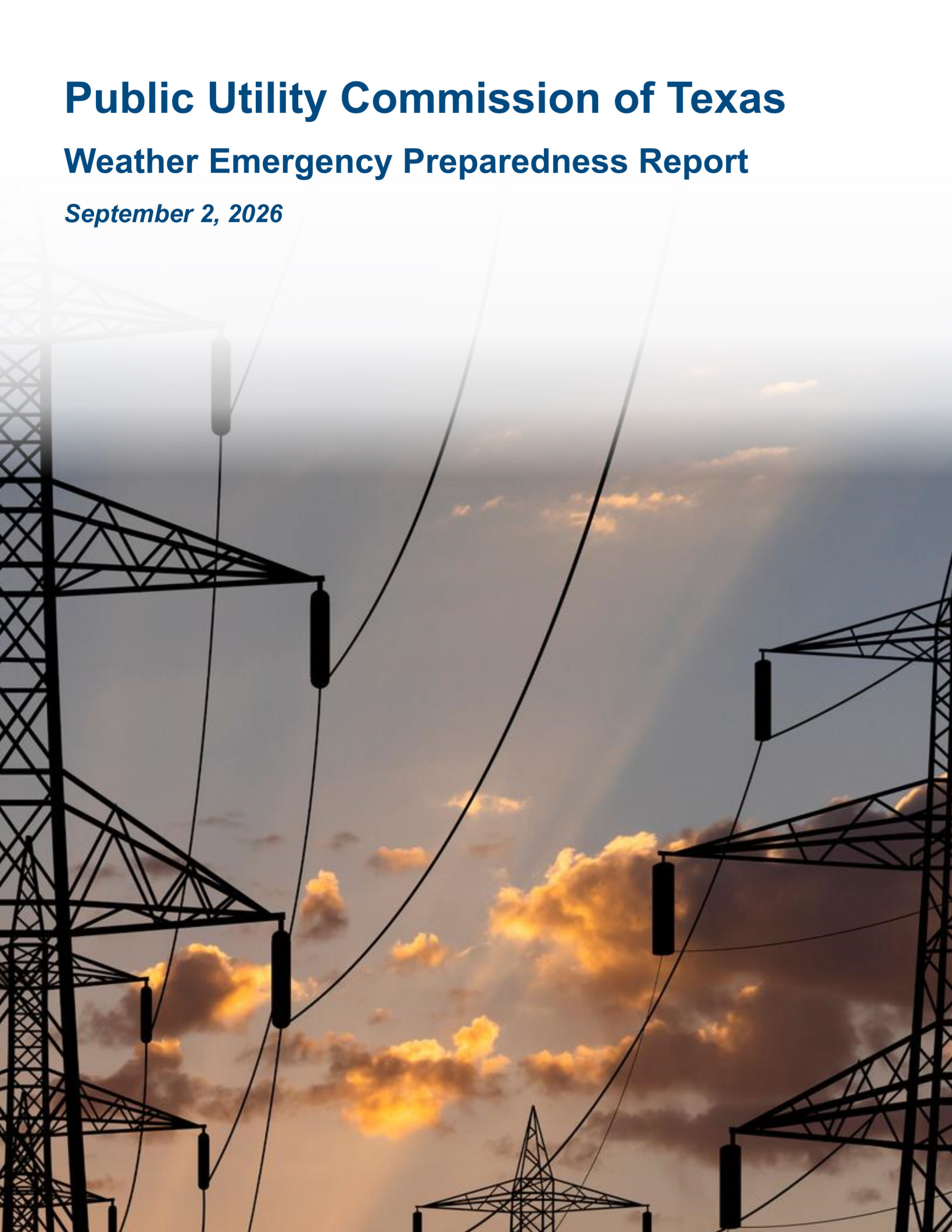
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Public Utility Commission of Texas

Weather Emergency Preparedness Report

September 2, 2026



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Executive Summary

Based on the documentation submitted for review, Texas electric entities generally demonstrated the core emergency planning elements needed to prepare for, respond to, and recover from severe weather events. The 2026 review found documentation of required Emergency Operations Plan (EOP) elements, including weather-related hazards, staffing, training, situational awareness, activation procedures, communications, and weather-specific annexes. These findings support the conclusion that the submitted plans provide a documented foundation for weather emergency preparedness across the Texas electric grid, while also identifying opportunities to improve consistency, annex detail, entity identification, and documentation of operational practices.

Guidehouse identified 1,131 registered electric entities with a 2026 filing requirement under 16 Texas Administrative Code (TAC) §25.53.[1][2] Of those entities, 926, or 82%, submitted either an EOP or an affidavit stating that no material changes have been made to the prior year EOPs.[3] 838, or 74% of the entities, provided complete EOPs.[4] This reflects compliance by a majority of the entities with the recent amendment to 16 TAC §25.53, which requires entities to comprehensively refile their EOPs every three years.

Of the 205 entities that did not submit either an EOP or an affidavit, 165 (80%) are Power Generation Companies (PGCs). Nearly all of these PGC non-submissions (161 of 165, or 98%) are classified as low-risk entities, indicating that the non-submission population is primarily concentrated among entities with limited potential impacts on system reliability and emergency preparedness. Additionally, some PGC non-submissions may be attributable to registration revocations or other registration status changes.[5]

The review was limited to the documentation submitted under 16 TAC §25.53 and does not independently verify operational performance, resource adequacy, real-time system conditions, or entity execution during an actual weather emergency.

The reviewed population included electric utilities, transmission and distribution utilities (TDUs), power generation companies (PGCs), municipally owned utilities (MOUs), and electric cooperatives (Co-ops), operating throughout Texas, and retail electric providers

[1] Guidehouse reviewed all EOP submissions that were made through April 15, 2026.
[2] 16 Tex. Admin. Code §25.53 (2026)
[3] 88 out of the 926 entities submitted affidavit-only filings; 36 of these had submitted complete EOP submission within the preceding three years, making these 36 entities compliant with the three-year filing requirement outlined in the 16 TAC §25.53.
[4] In addition to the 1,131 entities included in this report, 49 newly registered entities submitted EOPs prior to the filing deadline. However, these entities were excluded from this report because their registration approvals were not finalized until after April 15. For new registrations, registration requests and EOP submissions are submitted concurrently as part of the registration process; therefore, final approval may occur after the EOP filing deadline
[5] Registration revocations or other registration status changes post April 15, 2026; given that Guidehouse reviewed all submissions made through April 15, these registration-related updates are not reflected in this report

(REPs) in the Electric Reliability Council of Texas (ERCOT) region.[6] Guidehouse evaluated these submissions for adherence to the requirements of 16 TAC §25.53, with a specific focus on weather emergency preparedness and response planning.

In addition to the compliance review of all EOPs, Guidehouse developed a weather emergency preparedness framework to evaluate the maturity of entities' EOPs with specific focus on preparedness and response to adverse weather events. This maturity assessment was separate from the compliance review and was not used to determine whether entities complied with 16 TAC §25.53. Rather, the maturity framework was designed to evaluate how well sampled EOPs documented practices that support effective weather emergency preparedness, including practices that extend beyond the minimum requirements of 16 TAC §25.53. To evaluate EOP maturity and derive a maturity rating for electric entities' EOPs, Guidehouse first applied a high-level risk framework for all electric entities and sampled 50 EOPs against emergency weather preparedness best practices beyond the scope of 16 TAC §25.53. Guidehouse utilized a mixed sampling approach for its evaluation and assessed the overall maturity of the individual EOPs. The risk framework and maturity rating matrix drove recommendations to improve 16 TAC §25.53 and the overall readiness of the electric grid and informed the assessment of the ability of the grid to withstand extreme weather events in the coming year. The maturity ratings of the individual EOPs are a measurement of the EOP against industry best practices that exceed the requirements of 16 TAC §25.53.

High-Level Findings

Of the 1,131 registered electric entities subject to the 2026 EOP filing requirement under 16 TAC §25.53, 926 entities (82%) submitted an EOP or an affidavit of no material change to prior year EOPs, while 838 entities (74%) submitted complete EOP filings.

Overall, the 2026 filings demonstrated alignment with the amended requirements and generally included the information required under 16 TAC §25.53. A prior version of this report was prepared in 2024, before the 2025 amendments became effective. Accordingly, any high-level findings, trends, or comparisons between 2024 and 2026 have been interpreted with consideration of the changes in regulatory requirements, filing expectations, and available documentation between the two review cycles.

- **Standardization of EOP Submissions.** The 2026 review reflects a more standardized and complete set of EOP submissions, driven in part by amendments to 16 TAC §25.53 in 2025. These amendments, including the introduction of a required executive summary template and expanded expectations for annexes, have improved the organization and traceability of submitted materials across entity types. From a process perspective, the inclusion of executive summaries in the standardized format specified by PUCT has materially improved review efficiency and clarity. This improvement is further

[6] Hereafter, transmission and distribution entities may be referred to as TDUs, power generation companies as PGCs, municipally owned utilities as MOUs, electric cooperatives as Co-ops, and retail electric providers as REPs. Guidehouse's assessment also includes investor-owned utilities, referred to as IOUs and river authorities, referred to as RAs

supported by the presence of Entity ID numbers[7] in most EOPs with executive summaries - unique identifiers that enable accurate identification of submissions for entities operating under multiple or varying names.

- **Refined Evaluation of Annex Applicability and Completeness.** While the underlying evaluation approach remains consistent with the 2024 assessment, the 2026 review reflects a more explicit evaluation of annex completeness and applicability. Requirements continue to be interpreted based on each entity's operational role, with "not applicable" designations applied where appropriate. At the same time, increased requirements for complete annex submissions result in a more consistent basis for evaluating whether required documentation is both present and sufficiently developed, particularly within weather-related hazard planning.

- **Framework, Evaluation Approach, and Report Structure Remain Constant From 2024 to 2026.** The 2026 review reflects a materially expanded and more standardized set of EOP submissions, with the population increasing to over 1,100 registered electric entities and a corresponding shift toward more complete and consistent filings across entity types. Updates to 16 TAC §25.53 adopted in 2025 are evident in both the structure and content of submissions, including the introduction of a required executive summary template that provides more explicit mapping of EOP elements and administrative data. This requirement, which builds on the recommendations from the 2024 report, has improved the ability to review and validate submissions by increasing traceability across required plan components.

Areas of Relative Maturity

Broad areas of relative maturity include the indicators below, with particular strengths shown in electric entities establishing incident command system (ICS) structure and having programs and mechanisms for effective staffing, training, and situational awareness. The relative maturity of these indicators reflects that, as a group, electric entities in Texas have sufficient documentation to demonstrate that they are performing relatively well in these areas based on the information presented in their respective EOPs.



Indicator 1
ICS Structure



Indicator 4
Staffing



Indicator 6
Training and Emergency Drills



Indicator 7
Situational Awareness



Indicator 10
Activation of EOP



Indicator 12
Public Communications

[7] The entity registration number issued by PUCT or ID number assigned by PUCT.

Opportunities for Further Development

Broad areas with opportunities to further mature include the indicators below, several of which are outside the scope of what is currently required in an EOP. However, Guidehouse found value in including these factors within our weather preparedness assessment, as they were determined to be valuable strategies and procedures to augment or support a holistic emergency plan.



Indicator 2
Asset Management and Inspections



Indicator 3
Risk Management



Indicator 5
Mutual Assistance and Support



Indicator 8
System Design and Hardening



Indicator 9
Communication System



Indicator 11
Emergency Management and Planning Systems, Technologies, and Automation

Additionally, to promote and foster overall weather emergency preparedness and influence reliability of the grid, opportunities exist to further strengthen 16 TAC §25.53.

Overall, the 2026 review builds upon the framework, methodology, and regulatory interpretation used in the 2024 Weather Emergency Preparedness assessment. The evaluation approach remains unchanged. The primary updates for the 2026 review cycle, shown in **(PUCT**).

Table 1, are the enhanced compliance review process and the population of electric entities reviewed, which reflects updated filings submitted to the Public Utility Commission of Texas (PUCT).

Table 1. 2026 vs 2024 Review Cycle Elements Reviewed (EOPs and Affidavit Submissions)

Element	2024 Review	2026 Review
Number of Entities Reviewed	693	926
Evaluation Framework	Applied	Unchanged
Compliance Criteria	Applied	Unchanged
Compliance Review Process	Applied	Enhanced

Seasonal Weather Analysis

ERCOT's updated winter and summer analyses indicate that the majority of Transmission Service Provider facilities and generation resources are capable of operating under the seasonal conditions required by the PUCT's Weather Emergency Preparedness rule. For non-ERCOT regions, Southwest Power Pool (SPP) deliverability studies and Midcontinent Independent System Operator (MISO) readiness materials provide broader regional context, with SPP focused on modeled generation deliverability and MISO focused on resource availability, forecasting, reserves, coordination, and uncertainty management. These findings support a documented preparedness posture, while recognizing that actual performance during extreme weather events depends on real-time operating conditions, weather-driven demand, fuel availability, outages, transmission constraints, and operational execution.

1. Introduction

This report evaluates the documented weather emergency preparedness of Texas electric entities based on EOP filings submitted under 16 TAC §25.53. As part of the State's post-Winter Storm Uri efforts to strengthen preparedness, response, and resilience across the Texas electric system, the 87th Texas Legislature enacted Senate Bill 3 (SB 3), which directed the PUCT to adopt rules governing EOPs and to assess preparedness through periodic reporting to state legislators.

Based on the submitted documentation, many entities have established the core planning elements needed to prepare for and respond to severe weather events, while also identifying opportunities to improve consistency, annex detail, and documentation of operational practices. The assessment is limited to the content of submitted EOPs and does not independently verify field implementation, real-time system performance, or resource adequacy during an actual emergency.

Regulatory and Policy Context

Pursuant to SB3, the PUCT adopted 16 TAC §25.53, which requires all registered electric entities to develop, maintain, and annually submit EOPs that include defined procedures for emergency response, staffing, communication, and hazard-specific planning through annexes addressing extreme weather conditions such as cold weather, extreme heat, hurricanes, and other hazards. Complementary requirements under 16 TAC § 25.55 establish additional expectations for seasonal weather preparedness and operational performance.

These statutory and regulatory requirements establish the framework for evaluating the completeness, consistency, and operational relevance of EOP submissions and define the basis for the PUCT's Weather Emergency Preparedness Report.

Texas Weather Context and System Risk

Recent and historical weather events demonstrate how these risks translate into system-level impacts and highlight the importance of well-defined procedures, coordination, and execution. The February 2021 Winter Storm Uri remains the most significant example of system-wide disruption, during which sustained extreme cold led to widespread generation failures, fuel supply constraints, and prolonged outages affecting millions of customers. The event underscored critical gaps in weatherization practices, emergency coordination, and grid resilience, directly informing legislative action under SB3 and reinforcing the need for clearly defined procedures across EOP elements, including weather-specific annexes, staffing plans, and emergency response protocols.

Similarly, Hurricane Harvey in 2017 exposed vulnerabilities in restoration planning, infrastructure resilience, and cross-agency coordination during extended flooding events. While restoration timelines were generally shorter than prior hurricanes, localized infrastructure damage and access constraints highlighted the importance of

detailed restoration procedures, mutual assistance planning, and hazard-specific annexes within EOPs.

The May 2024 derecho and Hurricane Beryl, which caused extensive outages across the Houston region, prompted the PUCT to initiate Project No. 56822, *Investigation of Emergency Preparedness and Response by Utilities in Houston and Surrounding Communities*.[8] That investigation identified recurring challenges related to communication with customers and public officials, resource coordination, staffing mobilization, and restoration execution.[9] For purposes of this report, these findings are referenced as contextual background and illustrate the types of operational challenges that EOPs are intended to address. This assessment does not evaluate storm response performance or restoration outcomes and is limited to review of submitted EOP documentation in accordance with 16 TAC §25.53.

In addition, winter weather events in January 2025 and January 2026 introduced hazardous conditions across multiple regions of Texas, reinforcing the continued need to maintain readiness for short-duration, high-impact cold weather events. [10] While less severe than Uri, these events highlight the ongoing importance of maintaining effective situational awareness, activation protocols, and weather-specific response planning within EOP frameworks.

Collectively, these events demonstrate that extreme weather impacts are not driven solely by event severity, but also by the effectiveness of preparedness, coordination, and response. They establish the foundation for evaluating EOP quality, with particular relevance to communication systems, staffing and resource deployment, restoration planning, and the completeness and applicability of hazard-specific annexes.

Purpose and Scope of the Assessment

The PUCT engaged Guidehouse to evaluate the EOPs submitted by Texas electric entities in accordance with 16 TAC §25.53 and to assess weather emergency preparedness across the state. This assessment is based on a comprehensive review of submitted EOP documentation that evaluates the presence of required and recommended elements, the completeness of documentation, and alignment with regulatory expectations.

The review includes two primary analytical components. First, Guidehouse conducted a compliance assessment to evaluate adherence to the requirements of 16 TAC §25.53 based on the presence of required elements within submitted EOPs. Second, Guidehouse performed a targeted emergency preparedness assessment using a defined framework to evaluate the maturity of selected EOPs against industry best practices related to preparedness and response for adverse weather events. Further

[8] Public Utility Commission of Texas, "Memorandum opening Project No. 56822, Investigation of Emergency Preparedness and Response by Utilities in Houston and Surrounding Communities", July 2024, 56822_2_1410658.PDF (texas.gov).
[9] Public Utility Commission of Texas, "Title 16. Economic Regulation, Part 2. Public Utility Commission of Texas, Chapter 25. Substantive Rules Applicable to Electric Service Providers," November 2025, https://www.sos.state.tx.us/texreg/archive/November282025/Adopted%20Rules/16.ECONOMIC%20REGULATION.html.
[10] Climate.gov, "Historic January 2025 snowstorm in the Southern U.S.", January 2025, https://www.climate.gov/news-features/event-tracker/historic-january-2025-snowstorm-southern-us.

details on the methodologies and analytical approaches used for these components are provided in **Section 2. Evaluation Approach.**

This assessment is limited to the documentation provided as part of EOP submissions and does not constitute independent verification of operational performance, resource availability, system hardening, or actual emergency response execution. While EOPs provide a critical foundation for preparedness, they reflect programmatic planning and documented procedures rather than observed system performance during extreme weather events.

Accordingly, the results presented in this report should be interpreted within the context of documented preparedness, recognizing the distinction between compliance with required plan elements, maturity of preparedness practices, and broader system-level capability to withstand and respond to extreme weather conditions.

2. Evaluation Approach

Updates to 16 TAC §25.53 effective January 1, 2026, introduced greater specificity in certain filing and documentation requirements, particularly in distinguishing between information maintained within EOPs and information required as part of the regulatory submission. For purposes of this assessment, the compliance review framework remained consistent with the 2024 review cycle to preserve comparability across reporting periods.

To account for these updates, the 2026 deep dives used a hybrid sample of 50 entities, including entities reviewed in 2024, all entities identified as high risk in 2026, and an additional random sample of newly registered entities. The deep dives were intended to qualitatively assess the level of detail, specificity, and documentation included within selected EOP components and hazard-specific annexes and to identify differences in how entities address preparedness-related topics. Unlike the compliance assessment, the deep dives were not designed to evaluate adherence to regulatory requirements or measure compliance rates. Instead, they provide supplemental insights into the maturity and comprehensiveness of documented planning practices, including the extent to which entities incorporated elements associated with the updated rule requirements.

In addition, the Guidehouse team implemented a more structured quality assurance and quality control (QA/QC) framework in 2026 to further enhance consistency and rigor in the review process. This included regular reviews of a random sample representing approximately 10% of the 926 EOP submission assessments conducted, complemented by active engagement of subject matter experts to validate compliance interpretations. The process was further strengthened by assigning specific requirement areas and associated questions to designated reviewers, driving greater consistency in interpretation and application across the dataset. Collectively, these enhancements strengthened the accuracy and overall reliability of the assessment findings while reinforcing confidence in the results.

Transmission and distribution utilities (TDUs), power generation companies (PGCs), municipally owned utilities (MOUs), electric cooperatives (Co-ops), retail electric providers (REPs), and investor-owned utilities (IOUs) collectively referred to as Texas electric entities, filed their EOPs with PUCT as required by new 16 TAC §25.53 adopted in 2021. Texas electric entities are required to annually file an EOP or attestation of no material changes. This reporting year, all entities were encouraged to file an EOP in its entirety to align with amended 16 TAC §25.53 which requires an entity to file a complete EOP at least once every three years.

The following sections of this report describe Guidehouse's approach to assessing Texas electric entities' preparedness and response to severe weather events through its reviews of the submitted EOPs.

2.1 Methodology

Guidehouse's analysis focused on reviewing the EOPs in the context of 16 TAC §25.53, assessing the ability of Texas' electric power grid to withstand and respond to adverse weather events, with emphasis on weather preparedness and planning. Guidehouse performed the analysis in four distinct phases, as shown in **Figure 1**. The following sections provide additional details on the evaluation approach.

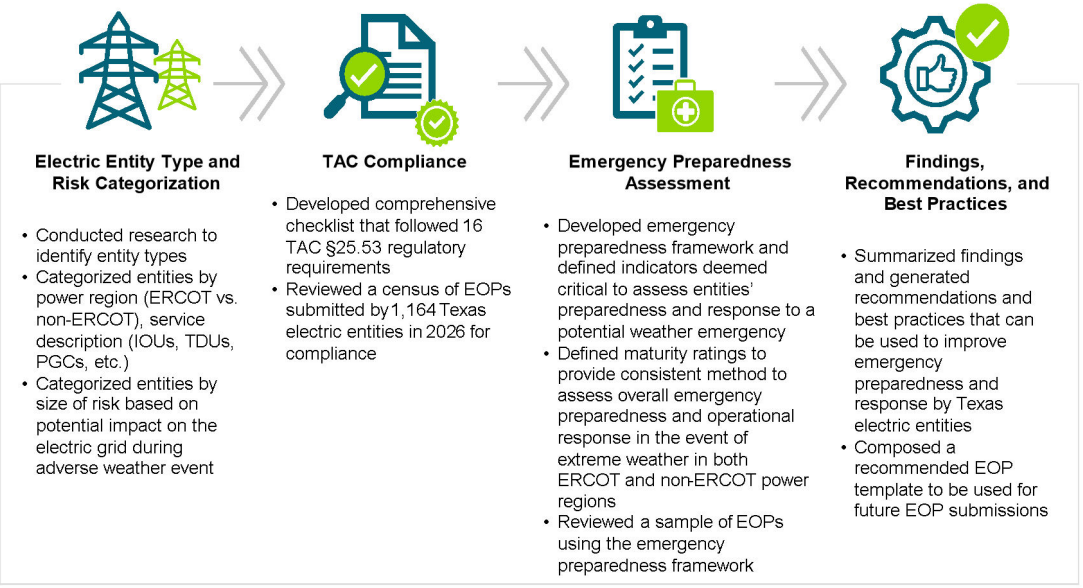


Figure 1- Analysis Methodology

2.2 Electric Provider Risk Categorization

Guidehouse developed a risk identification framework, as illustrated in **Figure 2**, based on operational responsibilities or characteristics inherent to each individual electric entity.

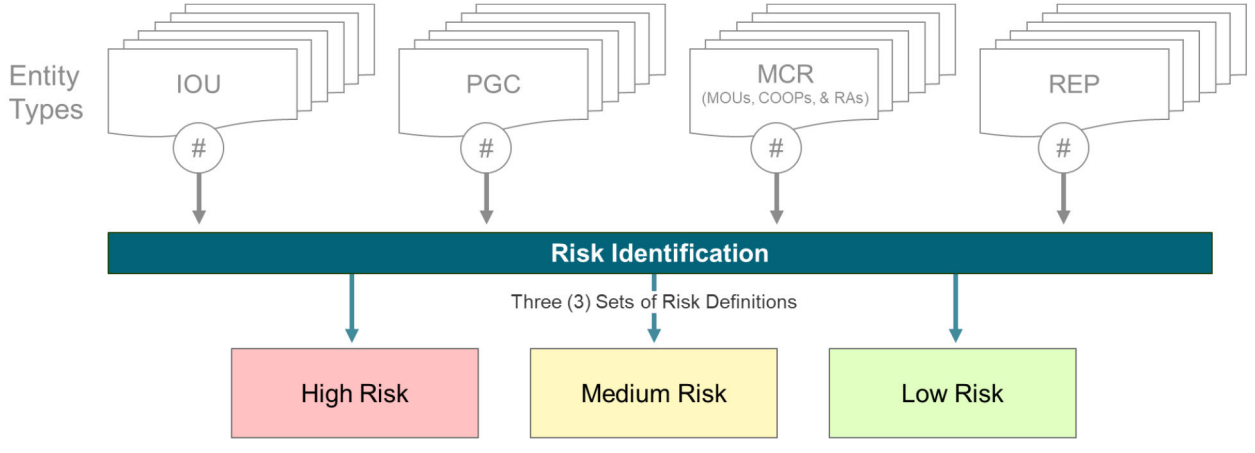


Figure 2- Entity Categorization and Impact Risk Identification

The framework developed is based, in part, on an existing Inherent Risk Assessment guide, developed and implemented by the North American Electric Reliability Corporation (NERC) in 2014.[11] The framework allowed Guidehouse to identify electric entities as low, medium, or high risk based on risk factors specific to each organization type; IOU, PGC, MCR, and REPs. The MCR category aggregates MOUs, Co-ops, and RAs into one group due to similarities in their structure and operational characteristics, including local ownership, nonprofit orientation, and community-focused service delivery.

Importantly, this framework is designed solely as an inherent risk screen based on structural and operational characteristics, and it does not represent a measure of actual preparedness, compliance, or operational performance. The classification reflects the relative potential impact of an entity's functions on the grid, rather than the effectiveness of its controls or readiness measures. As such, risk ratings do not account for mitigation activities, controls, or preparedness efforts that entities may have in place. High inherent risk entities may have strong controls and mature emergency preparedness programs, while lower inherent risk entities may still exhibit gaps in compliance or preparedness.

Moreover, for entities with multiple functional roles, the highest applicable inherent risk rating was assigned. For example, entities with both transmission and distribution responsibilities were categorized based on the higher of the applicable risk factors. **Table 2** provides the risk factors implemented for this assessment.[12]

Table 2. Criteria Used to Assess Risk for Each Entity Category

Entity Type	High	Medium	Low
IOU/TDU	T: Owns and/or operates assets greater than 200 kV D: Greater than 200,000 customers	T: Owns and/or Operates 100 kV to 200 kV assets D: 50,000 to 200,000 customers	T: Owns and/or Operates assets less than 100 kV D: Less than 50,000 customers
PGC	Total generation portfolio capacity is greater than 2,500 MW or Generation portfolio includes a nuclear site	Total generation capacity is between 1,000 - 2,500 MW	Total generation capacity is less than 1,000 MW
MOU, Co-op & RA	Greater than 200,000 customers	50,000 to 200,000 customers	Less than 50,000 customers
REP	Not Applicable	Greater than 50,000 customers	Less than 50,000 customers

[11] North American Electric Reliability Corporation (NERC), "ERO Enterprise Inherent Risk Assessment Guide," October 2014 (https://www.nerc.com/pa/comp/reliability%20assurance%20initiative/ero_enterprise_inherent_risk_assessment_guide_20141010.pdf).

[12] In certain isolated instances, Guidehouse and PUCT staff used professional judgment and discretion to identify additional contributing factors that elevated or reduced the risk rating of an energy provider to best produce analysis supporting the needs of this report.

2.3 16 TAC §25.53 Compliance

Guidehouse developed a comprehensive checklist to assess compliance with 16 TAC §25.53 for the EOP submissions by Texas electric entities. The team created this checklist based on the requirements in 16 TAC § 25.53. These requirements include, but are not limited to, those listed in **Figure 3-** 16 TAC §25.53 Requirements. The rule also requires a revision control summary, emergency contact lists, a list of individuals responsible for maintaining, implementing, and updating the EOP as well as a business continuity plan and more. The compliance review evaluated whether submitted EOP documentation included the required plan elements; it did not include independent testing of implementation or assessment of operational effectiveness.

For a full list of requirements that Guidehouse used to assess compliance with 16 TAC §25.53, please see **Appendix A**.

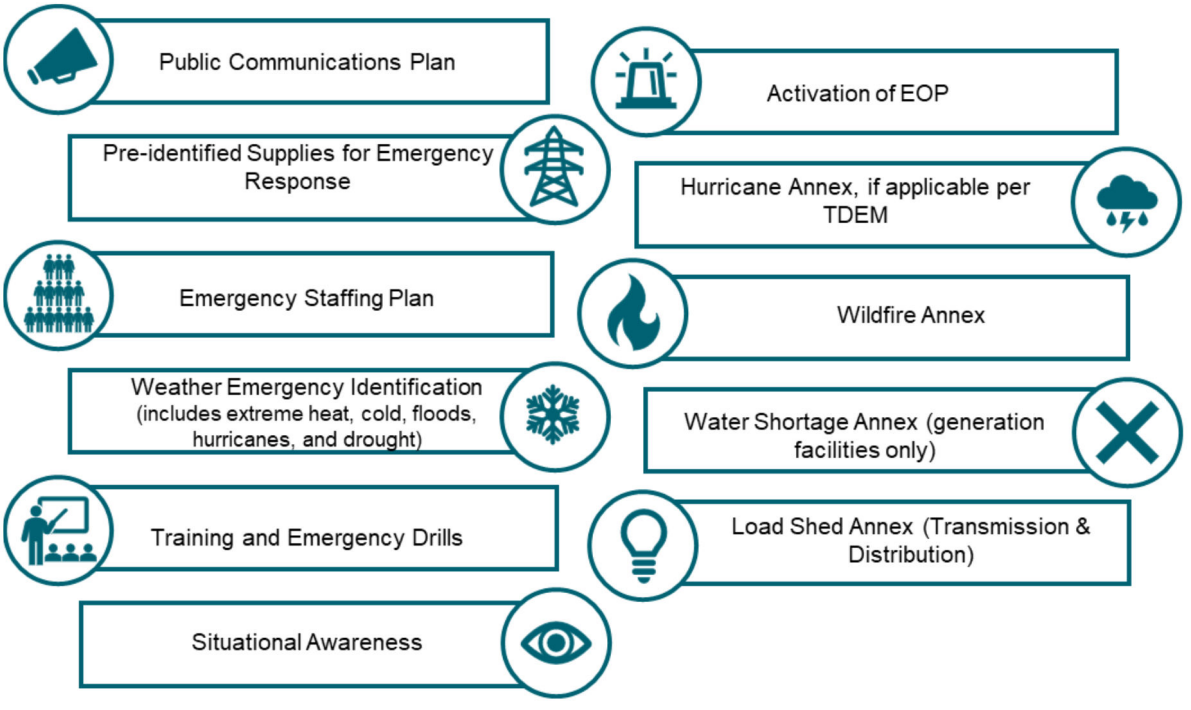


Figure 3- 16 TAC §25.53 Requirements

Using the compliance checklist, the team reviewed each EOP to confirm whether required elements were included. Guidehouse reviewed all EOPs submitted between January 1, 2026, and April 15, 2026. Results and findings related to 16 TAC §25.53 compliance are discussed in **Section 3. 16 TAC § 25.53 Compliance Findings**.

2.4 Weather Emergency Preparedness Framework

The next phase of the analysis evaluated the ability of the Texas electric grid to prepare for and recover from adverse weather events. The team conducted in-depth reviews of a hybrid sample of EOPs submitted by Texas electric entities across ERCOT and non-ERCOT power regions. To facilitate these reviews, Guidehouse developed a weather emergency preparedness framework to evaluate the maturity of entities' EOPs with a specific focus on preparedness and response to adverse weather events. These events included extreme heat, extreme cold, storms, hurricanes, wildfires, tornadoes, drought/water shortage (generation only), and floods.

The maturity framework applies a consistent methodology across 12 indicators to enable comparative assessment of EOP maturity. Importantly, these maturity indicators are designed to evaluate practices that extend beyond the minimum requirements defined in 16 TAC §25.53. Maturity ratings were determined solely on information provided within the filed EOP documentation for Project No. 53385 and do not consider processes or capabilities not included in those filings. Accordingly, the absence of documented information related to specific maturity indicators should not be interpreted as an indication that an entity lacks the corresponding practices; rather, it reflects only that such practices were not evidenced within the submitted materials.

2.4.1 Weather Emergency Preparedness Indicators

Guidehouse identified the essential criteria that an EOP should demonstrate to serve as indicators of the level of the electric entity's preparedness and response to an adverse weather event. The development of these indicators was informed by industry best practices on emergency preparedness. The team identified and defined 12 indicators that are critical to an effective emergency response to ensure electric service to customers and improve the reliability of the electric grid in an emergency. The assessment of the indicators was based solely on the EOP submissions provided to the PUCT and ERCOT.

Guidehouse understands that some entities may currently employ the practices associated with these indicators but did not report practices in their EOPs that are not specifically required by 16 TAC §25.53. Review of the EOP submissions alone may not provide sufficient documentation to fully assess each indicator. Guidehouse acknowledges that the indicators exceed the requirements of 16 TAC §25.53 and were developed to identify best practices and information gaps in submitted EOPs. The indicators are not representative of non-compliance to 16 TAC §25.53. Deficiencies or gaps in an indicator represent potential weakness compared to best practices. However, for comprehensive assessment of weather emergency preparedness and to potentially provide a framework for future grid improvements or enhancements to 16 TAC §25.53, the assessment team employed all 12 indicators. **Table 3** provides the list and definitions of the critical indicators that Guidehouse used to assess emergency preparedness and response when reviewing the filed EOPs. The review team acknowledges that many entities may implement measures consistent with these

indicators but may not have reported such practices, as many of these measures go beyond the requirements of 16 TAC §25.53.

Table 3. Assessment Framework Indicator Definitions

	Indicator	Emergency Preparedness Indicators	16 TAC §25.53 Requirements?
	**Indicator 1 –** ICS Structure	A formal emergency management governing body enhances communication, resource coordination, and operational effectiveness in the event of adverse weather conditions. The system must define roles and reporting relationships via a hierarchical structure for effective command, control, and coordination of emergency response efforts.	No[13]
	**Indicator 2 –** Asset Management and Inspections	Robust asset management strategies and protocols help ensure optimal performance, reliability, and safety of utility infrastructure during adverse weather conditions. An asset management plan must include procedures to maintain preidentified supplies for an emergency response. Processes must be defined and implemented to optimize utility infrastructure inspections and timely maintenance and repairs.	Yes
	**Indicator 3 –** Risk Management	Risk management plans must be developed for critical infrastructure, and preventative mitigation actions must be performed in advance of an adverse weather season.	No[14]
	**Indicator 4 –** Staffing	Resource planning and acquisition must be sufficient for response to large-scale emergencies.	Yes
	**Indicator 5 –** Mutual Assistance and Support	Mutual aid can be critical to lead an effective response to a large-scale emergency to ensure utilities can restore electric service to their customers in a timely manner.	Yes
	**Indicator 6 –** Training and Emergency Drills	Employees must be prepared, knowledgeable, and trained. Annual drills to address all types of hazards must be conducted to test that training of all staff was effective.	Yes
	**Indicator 7 –** Situational Awareness	Utilities must be able to recognize and monitor extreme weather conditions well in advance of a potential emergency to produce informed, comprehensive, and actionable preparation and response.	Yes

[13] Under TAC §25.53 (c)(4)(C)(vi), Entities must certify that emergency management personnel designated to interact with local, state, and federal emergency management officials during emergency events have completed the most current National Incident Management System (NIMS) training courses IS-100, IS-200, IS-700, and IS-800.
[14] Based on NERC requirements and the 16 TAC §25.55 requirements for ERCOT-only generation and Transmission Service Provider (TSP) entities

	Indicator	Emergency Preparedness Indicators	16 TAC §25.53 Requirements?
	**Indicator 8 –** System Design and Hardening	Utilities should invest resources to achieve cost-effective short-term and long-term reliability solutions, minimizing the negative impacts of adverse weather to their customers.	No, covered by 16 TAC §25.95 rule
	**Indicator 9 –** Communication System	Employees must have multiple methods of communication to ensure all staff are aware of emergency updates and able to communicate with one another while responding to an emergency.	No
	**Indicator 10 –** Activation of EOP	A defined process must exist to activate operational protocols in the event of adverse weather, including identifying the decision-makers that have the authority to activate an emergency response within the organization.	Yes
	**Indicator 11 –** Emergency Management and Planning Systems, Technologies, and Automation	Electric entities that utilize automation and advanced systems and technologies in emergency situations can improve the efficiency and effectiveness of their response. These entities have the capability to improve on every step of emergency preparedness and response, minimizing power losses and impact on their customers and the public.	No, element of resiliency assessment[15]
	**Indicator 12 –** Public Communications	Electric entities must effectively communicate in emergency situations with their direct and indirect customers and stakeholders, including public officials, fuel suppliers, reliability coordinator (RC), regulatory entities, and the media to foster transparency related to climate hazards, speed and effectiveness of their response and restoration of power during an emergency.	Yes

2.4.2 Assessment Framework Maturity Matrix Overview

The team developed definitions associated with the three levels of maturity ratings to improve consistency of evaluation and generate robust results during EOP reviews. The definitions included the criteria necessary to assign a specific rating for each of the 12 indicators. Guidehouse assigned a rating of 1, 2, or 3 for each indicator to establish its maturity level in relation to its response to a variety of adverse weather scenarios (e.g., extreme cold weather, extreme hot weather, hurricane, etc.). A rating of 1 (low maturity) signals that an indicator lacks content or contains good business practices with minimal details provided. A rating of 2 (medium maturity) establishes that key elements of good business practices for weather emergency preparedness and response are present, but some elements are missing. A rating of 3 (high maturity) indicates that the EOP demonstrated advanced level of preparedness practices and operational planning

[15] Majority of IOUs have submitted system resiliency plans to the commission as permitted by 16 TAC §25.62

elements, incorporating all criteria associated with each indicator. For specific definitions and criteria associated with each emergency preparedness indicator and its maturity rating options, please refer to **Appendix B: Assessment Framework** Maturity Matrix.

2.4.3 Sample Design and In-Depth EOP Reviews

Guidehouse applied a hybrid sampling methodology to support an efficient and targeted evaluation of EOPs submitted by Texas electric entities. The evaluation team initially segmented the population of EOPs into defined strata based on ERCOT versus non-ERCOT regions, entity type, and impact risk rating, as described in section **2.2 Electric Provider Risk Categorization**. This method helped assure that all types of entities from various categories are represented in the random sample selection.

In the 2024 assessment, this methodology supported the selection of a representative random sample of 37 entities for in-depth review. For the 2026 review, Guidehouse adopted a longitudinal-plus-targeted approach by revisiting these 37 entities to enable direct comparison across reporting cycles, while also incorporating an additional 13 entities – two high risk entities and 11 additional medium risk entities - to expand coverage of entities. This resulted in a total 2026 sample of 50 entities.

MOUs, Co-ops, and RAs were evaluated within a combined group due to similarities in their structure and operational characteristics, including local ownership, nonprofit orientation, and community-focused service delivery.

Next, Guidehouse conducted in-depth reviews of the sampled EOPs and assigned a maturity rating for the emergency preparedness indicators for each type of potential hazard. To calculate the overall score for each indicator, the team calculated a simple average of the maturity ratings assigned for each indicator across all reviewed EOPs for each category of entities. An average rating across the reviewed EOPs of 2.5 or above was defined as high maturity rating when evaluating emergency preparedness indicators of various entities by category in aggregate (Non-ERCOT, ERCOT PGCs, IOUs, etc.). A rating of 2.0 or above, but below 2.5, was defined as medium maturity; and a rating lower than 2.0 was defined as low maturity. These average ratings provided an overall assessment score of emergency preparedness across various electric entity types in ERCOT and non-ERCOT power regions.

Following completion of emergency preparedness assessment via in-depth EOP reviews, Guidehouse generated results and summarized its findings and recommendations. The discussion of the results and findings associated with weather emergency preparedness and response are included in **Section 4. Weather Emergency Preparedness Findings.** Guidehouse also generated a list of recommendations and best practices, which are provided in **Section 7. Recommendations**. These recommendations and best practices, if implemented, will strengthen 16 TAC §25.53 and improve EOPs and organizational effectiveness when responding to a variety of weather-related emergencies.

It is important to note that Guidehouse's review was strictly focused on the EOP documentation required by 16 TAC §25.53. Guidehouse acknowledges that entities may have additional processes, procedures, tools, and controls in place that are not fully represented in the 16 TAC §25.53 EOP filings.

2.5 Seasonal Weather Analysis

Based on ERCOT's seasonal weather analysis, most transmission facilities and generation resources demonstrated sustained operating capability under the winter and summer temperature conditions evaluated under the Weather Emergency Preparedness rule. This finding supports the conclusion that, based on the available ERCOT reporting data, the reviewed assets generally have documented operating capability for the seasonal conditions assessed under 16 TAC §25.55. However, these results should be interpreted as indicators of reported temperature-based operating capability, not as a standalone measure of overall grid reliability, resource adequacy, or actual performance during an extreme weather event.

In accordance with Texas Utilities Code §186.007, ERCOT analyzed reporting data required under 16 TAC §25.55 and provided the results to the PUCT to support interpretation of seasonal preparedness. ERCOT's analysis evaluates sustained operating temperature thresholds for generation resources and transmission service provider facilities against established extreme weather benchmarks.

Actual system performance during extreme weather events depends on additional factors not fully captured by sustained operating temperature data, including demand levels, resource availability, fuel availability, forced outages, equipment derates, transmission deliverability, and real-time operating conditions. Accordingly, ERCOT's analysis provides important supporting evidence for documented weather preparedness, but it should be read alongside the broader EOP compliance review, maturity assessment, and non-ERCOT regional analysis presented in this report.

The comparison of ERCOT weatherization data between 2024 and 2026 reflects both expanded reporting coverage and targeted improvements in data quality, resulting in a more refined and representative dataset for assessing system performance under extreme weather conditions. While weather-zone-averaged values continue to provide a consistent analytical baseline, updates implemented in the 2026 reporting cycle, including removal of out-of-scope and duplicate facilities, correction of data inputs, and incorporation of site-specific temperature information, significantly affect year-over-year comparisons. As a result, observed differences in facility counts, operating temperatures, and benchmark coverage across weather zones should be interpreted in the context of these methodological enhancements to improve accuracy rather than as direct indicators of changes in system capability.

ERCOT's analysis included the following:

1. **Evaluation of sustained operating temperature thresholds for generation and transmission assets**- ERCOT compiles weather-zone averaged minimum

and maximum ambient temperatures at which generation resources and Transmission Service Provider facilities have demonstrated sustained operations. These values reflect reported system capabilities under observed conditions and establish a baseline for assessing performance under extreme weather scenarios.

2. **Benchmarking of reported operating thresholds against extreme weather conditions**- Sustained operating temperatures are evaluated against extreme temperature benchmarks derived from ERCOT's historical weather study, including 95th percentile minimum 72-hour wind chill temperatures for winter and 95th percentile maximum 72-hour temperatures for summer. This comparison provides a consistent basis for assessing system capability relative to historically observed extremes.
3. **Interpretation of grid performance under projected extreme conditions**- Differences between reported sustained operating thresholds and historical extreme temperature benchmarks are used to interpret the ability of the electric grid to withstand and operate during severe weather events. This interpretation informs an assessment of system resilience under both winter and summer stress conditions.

Key Changes Since the 2024 Report

The comparison of ERCOT weatherization data between 2024 and 2026 reflects both an increase in available facility-level information and targeted data quality improvements implemented in the 2026 reporting cycle. Weather-zone-averaged values continue to be derived from Transmission Service Providers and Generation Entities through semi-annual Declarations of Weather Preparedness, providing a consistent basis for evaluating system performance under extreme weather conditions.

- **Data Refinements and Methodological Improvements**
  Between reporting cycles, ERCOT implemented several refinements to improve the accuracy and comparability of the dataset.[16] These updates include removal of facilities outside the scope of applicable weather emergency preparedness requirements, elimination of duplicate records, correction of county and weather zone assignments, and exclusion of facilities not fully commissioned. ERCOT also replaced uniform temperature assumptions used in prior submissions with site-specific experienced temperature data, improving the representativeness of zone-level results.
  As a result, observed differences between 2024 and 2026 data reflect not only changes in reported system performance, but also improvements in data processing, facility eligibility determinations, and reporting practices. ERCOT notes that certain year-over-year deltas are attributable to these methodological corrections rather than underlying changes in grid resilience or operational capability.

- **System-Level Observations and Variability**

[16] Comparison of 2024 and 2026 ERCOT Weatherization Data for the PUCT Weather Emergency Preparedness Report (Provided by ERCOT)

Facility counts and reported operating thresholds changed unevenly across weather zones and resource types between 2024 and 2026. For transmission facilities, the number of winter records decreased following the removal of duplicate and out-of-scope facilities, while the number of generation records increased modestly. These changes affect the composition of the datasets being compared and should not, by themselves, be interpreted as evidence of improved or reduced operating capability.
Changes in average minimum experienced temperatures and winter benchmark coverage also varied by weather zone. In some zones, facilities reported higher minimum operating temperatures in 2026, resulting in a smaller share of facilities with reported thresholds at or below the historical wind chill benchmark. Other zones maintained stronger benchmark coverage. The results therefore do not indicate a uniform statewide change. Instead, they identify zone-specific differences that should be interpreted alongside the 2026 data refinements and the use of more representative site-specific temperature information.

- **Wind-Adjusted Performance Considerations**
  Because the minimum ambient temperatures observed did not account for concurrent wind conditions commonly experienced during winter weather events, wind chill values were calculated using assumed wind speeds of 10 mph and 20 mph. When wind effects were considered alongside cold temperatures, the percentage of facilities and resources that had experienced conditions more severe than the applicable benchmark thresholds increased substantially. These results reinforce that dry-bulb temperature reporting alone does not fully capture winter operational conditions, and that wind-adjusted metrics provide necessary additional context for assessing system performance under extreme weather scenarios.

- **Seasonal Outlook Context**
  Seasonal outlooks provide additional context for these findings. NOAA forecasts indicate above-normal precipitation across Texas during Winter 2026-2027, supported by expectations of a very strong El Niño, while the Summer 2027 outlook is more mixed, with below-normal precipitation favored in West Texas, above-normal precipitation favored in East Texas, and Equal Chances across much of the state. Temperature outlooks also vary by season. For Winter 2026-2027, most of Texas is forecast to experience Equal Chances of above-, near-, or below-normal temperatures, with only a weak signal toward above-normal temperatures in portions of North and East Texas. In contrast, Summer 2027 temperatures are generally forecast to be above normal across Texas, with moderate probabilities of occurrence. These outlooks should be viewed as planning inputs rather than forecasts of specific weather events, helping entities frame preparedness assumptions while maintaining flexibility for a range of localized and event-driven conditions.

  While these outlooks do not directly affect the historical operating conditions reported by ERCOT, they provide context for expected system exposure and

reinforce the need for sustained preparedness across both extreme heat and potential winter weather scenarios.

Interpretation of 2024 and 2026 Differences

Based on the data provided, 2026 ERCOT weatherization dataset reflects a transition toward more precise and standardized reporting. Improvements in data quality, facility classification, and temperature representation enhance the reliability and interpretability of the dataset relative to 2024. As a result, differences between the 2024 and 2026 reporting cycles should not be interpreted as direct indicators of changes in system performance but rather reflect a combination of updated data practices and underlying system preparedness.

3. 16 TAC §25.53 Compliance Findings

According to the data provided by the PUCT, 926 out of 1,131 applicable electric entities submitted EOPs or other required documentation between January 1 and April 15, 2026, all of which were reviewed by Guidehouse. Under the amended requirements of 16 TAC §25.53, entities were encouraged to comprehensively refile their EOPs in 2026 as part of the required three-year refiling cycle, rather than relying solely on affidavit-based filings.[17] Of the 926 submissions received, 838 entities submitted full EOPs.[18]

Filing requirements differed between the 2024 and 2026 review cycles. In 2024, entities could satisfy the requirement either by submitting a full EOP or by filing an affidavit certifying that no material changes had been made to their previously submitted EOP. In contrast, the 2026 filing cycle required entities to submit complete EOPs as part of the comprehensive refiling requirement every three years. For purposes of the 2024-to-2026 compliance findings comparison presented in this report, the 838 complete EOP submissions reviewed in 2026 were supplemented with 88 affidavit-only submissions, resulting in a total population of 926 entities and ensuring consistency with the 2024 population reviewed. Because the 88 affidavit-only submissions did not include updated EOPs for review in 2026, their 2024 compliance results were carried forward for comparison purposes. This approach provides a more consistent basis for year-over-year analysis.

Table 4 displays the comparison of Total, ERCOT, and Non-ERCOT entities reviewed against 2024 figures.

Table 4. ERCOT and Non-ERCOT Entities Reviewed 2024 vs 2026 Comparison

Category	2024 Review	2026 Review
Total Entities Reviewed	693	926
ERCOT Entities	647	861
Non-ERCOT Entities	46	63

Key Changes Since the 2024 Report

- **Entity Identification and Data Consistency**

[17] 88 out of the 926 entities submitted affidavit-only filings; 36 of these had submitted complete EOP submission within the preceding three years, making these 36 entities compliant with the three-year filing requirement outlined in the 16 TAC §25.53.
[18] In addition to the 1,131 entities included in this report, 49 newly registered entities submitted EOPs prior to the filing deadline. However, these entities were excluded from this report because their registration approvals were not finalized until after April 15. For new registrations, registration requests and EOP submissions are submitted concurrently as part of the registration process; therefore, final approval may occur after the EOP filing deadline

A key challenge impacting the efficiency and reliability of the review process is the inconsistent use or complete omission of Entity ID numbers in submitted executive summaries. While the number of entities providing this information increased in 2026, a notable subset of submissions still lacks standardized or accurate Entity IDs. This gap introduces several operational and analytical challenges, including reduced review efficiency due to the need for manual validation and follow-up, which delays the assessment process and increases administrative burden. In addition, the absence of consistent identifiers complicates entity matching and attribution, particularly when naming conventions vary, raising the risk of misattribution or duplicate records. From a data perspective, inconsistent identification practices diminish overall data completeness, limiting the ability to analyze and compare submissions across entities. Addressing this issue through clearer submission requirements, validation checks, and standardized naming protocols would significantly improve data integrity, streamline the review process, and strengthen compliance monitoring at scale.

- **Introduction of Flood Annex**
  Flood Annex documentation represents an important new area of evaluation introduced through the 2025 amendments to 16 TAC §25.53. In the 2026 filing cycle, 84% of entities that submitted reviewable EOP filings included a Flood Annex. These results provide the first baseline assessment of compliance with the newly established requirement and indicate that most entities submitting complete EOPs incorporated flood-specific planning into their emergency preparedness documentation.

  Flood-related planning was previously addressed within broader weather hazard identification and emergency preparedness requirements; however, the 2025 amendments established more explicit expectations for flood-specific planning for applicable facilities and resources. As a result, the 2026 review provides enhanced visibility into how entities document flood preparedness, including considerations related to facility impacts, operational continuity, and restoration activities during flooding events.

- **Standardized EOP Framework with Function-Based Applicability of Annex Requirements**
  Between the 2024 and 2026 reporting cycles, the structure and applicability of the 16 TAC §25.53 requirements reflect a standardized EOP framework while preserving distinctions based on entity function. In the 2024 report, Guidehouse applied a functional lens to subsection (e) requirements, designating certain annexes as not applicable where entities did not have direct operational responsibility. For example, load shed and wildfire annexes were evaluated for transmission and distribution utilities, while water shortage and restoration annexes were evaluated for generation entities. This approach resulted in targeted use of "N/A" designations to reflect operational relevance.
  The 2026 amendments to 16 TAC §25.53 clarified expectations around completeness, consistency, and transparency of EOP submissions, including

requirements to file annexes in full and align with a more uniform submission structure. The 2026 evaluation approach reflects these expectations by assessing submitted documentation more explicitly while maintaining the application of "N/A" designations where requirements remain differentiated by entity type. This ensures that compliance results capture both the standardized structure of EOP filings and the functional scope of each entity's responsibilities.

The applicability of certain annexes continues to be determined based on the operational role of each entity, and "not applicable" designations are retained where requirements do not align with an entity's functional responsibilities. Furthermore, annexes addressing non-weather hazards, including cybersecurity and pandemic planning, are not evaluated as part of this analysis, which is focused on severe weather preparedness and response.

- **Gaps in Annex Depth and Role Alignment Require Careful Interpretation** In 2026, variation in compliance becomes more pronounced within subsection (e), which governs annex requirements and reflects differences in operational responsibilities across entity types. For example, requirements tied to transmission and distribution functions, such as the load shed annex and wildfire annex, show high compliance among IOUs and MOUs/ Co-ops, while being appropriately excluded from generator and retail provider evaluations based on applicability. Similarly, generation-specific annexes, including water shortage and restoration of service, demonstrate stronger performance among PGCs and lower or inconsistent results when evaluated outside that context.

2026 Compliance Findings

Guidehouse assessed compliance with 16 TAC §25.53 based on the presence of these requirements in the EOP documentation provided by entities. Based on the compliance review of all EOPs submitted, Guidehouse determined that these entities generally provided sufficient information to demonstrate adherence to legal requirements. Importantly, weatherization procedures, staffing, training, situational awareness, and activation of EOP scored highly in compliance across all entity types.

The 2026 evaluation reflects consistently high compliance across the foundational requirements of 16 TAC §25.53, particularly within subsections (c) and (d), which govern EOP filing, governance, and core plan content.[19] Most entities demonstrated strong performance in maintaining continuous EOP updates, documenting responsible personnel, and providing required approval, revision control, and implementation elements. Compliance rates for these provisions generally exceeded 90 percent across IOUs, PGCs, MOUs, and Co-ops, with slightly lower but still consistent results among REPs. This indicates that the baseline expectation established under the rule -

[19] Certain required EOP annexes, including pandemic and epidemic, cyber security, and physical security annexes, were not included in the weather emergency preparedness analysis because they are not directly related to severe weather preparedness or response. These requirements remain part of 16 TAC §25.53 filing expectations but were excluded from the weather-focused compliance table for consistency with the scope of this report.

maintaining a complete, approved, and operational EOP - is now broadly institutionalized across entity types.

Compliance with 16 TAC §25.53 requirements reflects the presence and documentation of required plan elements; however, it does not, in isolation, indicate the quality or effectiveness of implementation. Strong documentation may not correspond to fully developed operational capabilities, and lower-scoring areas may reflect variability in interpretation or execution rather than complete absence of planning.

Table 5 displays overall 16 TAC §25.53 compliance along with a breakdown of compliance by entity type.

Table 5. 16 TAC §25.53 Compliance Findings (2026)

16 TAC §25.53	Description	Compliance (%)[20]				
		All	IOU/TDU	PGC	MOU/ Co-op	REP
(c) (1) (i)	Executive Summary	86%	82%	86%	91%	78%
(c) (3)	Continuous Maintenance of EOP	92%	82%	92%	95%	88%
(c) (4) (A)	Record of Distribution	76%	91%	75%	86%	72%
(c) (4) (B)	Emergency Contacts	92%	91%	93%	94%	85%
(c) (4) (C)	*Signed Affidavit from Entity's Highest-Ranking Representative Affirming the Following:*					
(c) (4) (C) (i)	Relevant Personnel are Familiar With and have Received Training on the EOP	93%	91%	96%	91%	77%
(c) (4) (C) (ii)	Reviewed and Approved by Appropriate Executives	92%	91%	95%	90%	77%
(c) (4) (C) (iii)	Drills Have Been Conducted to the Extent Required	93%	91%	96%	91%	77%
(c) (4) (C) (iv)	Distributed to Local Jurisdictions	81%	91%	81%	89%	70%
(c) (4) (C) (v)	Business Continuity Plan	93%	91%	94%	95%	84%
(c) (4) (C) (vi)	Personnel Training (IS-100, IS-200, IS-700, IS-800 NIMS)	86%	91%	89%	89%	69%
(d) (1) (A)	Approval and Implementation Section Introduction	96%	91%	97%	97%	88%
(d) (1) (A)	Outline of Applicability	96%	91%	97%	97%	92%
(d) (1) (B)	List of Individuals Responsible for Maintaining and Implementing EOP	92%	91%	94%	93%	83%
(d) (1) (B)	List of Individuals who Can Change EOP	86%	82%	87%	89%	78%

[20] N/A denotes the requirement is not applicable to the specific entity type.

16 TAC §25.53	Description	Compliance (%)[20]				
		All	IOU/TDU	PGC	MOU/ Co-op	REP
(d) (1) (C)	Revision Control Summary	96%	91%	98%	95%	88%
(d) (1) (D)	Dated Statement of Approval Adopting the Plan and Superseding Previous Plan	97%	91%	98%	96%	97%
(d) (1) (E)	Most Recent Approval Date	84%	82%	83%	91%	77%
(d) (2)	Communication Plan	84%	91%	82%	98%	84%
(d) (4)	Staffing	94%	91%	97%	96%	74%
(d) (5)	Identification of weather-related hazards and activation of EOP	94%	91%	96%	97%	79%
(e) (1) (A)	Weather Emergency Annex (T&D)	89%	91%	*N/A*	88%	*N/A*
	Cold Weather	*89%*	91%	*N/A*	*88%*	*N/A*
	Hot Weather	*87%*	*82%*	*N/A*	*88%*	*N/A*
(e) (1) (B)	Load Shed Annex (T&D)	92%	73%	*N/A*	94%	*N/A*
(e) (1) (D)	Wildfire Annex (T&D)	92%	91%	*N/A*	93%	*N/A*
(e) (1) (E)	Hurricane Annex[21] (gen, T&D, REP)	87%	76%	92%	94%	77%
(e) (1) (H)	Flood Annex[22]	84%	82%	84%	88%	*N/A*
(e) (3) (A)	Weather Emergency Annex (PGC)	95%	*N/A*	95%	*N/A*	*N/A*
	Cold Weather	95%	*N/A*	95%	*N/A*	*N/A*
	Hot Weather	92%	*N/A*	92%	*N/A*	*N/A*
(e) (3) (B)	Water Shortage Annex (gen only)	68%	*N/A*	68%	*N/A*	*N/A*
(e) (3) (C)	Restoration of Service Annex (gen only)	90%	*N/A*	90%	*N/A*	*N/A*
(e) (3) (E)	Hurricane Annex (gen, T&D, REP)	87%	82%	85%	*N/A*	*N/A*
(e) (4) (B)	Hurricane Annex (gen, T&D, REP)	77%	*N/A*	*N/A*	*N/A*	70%

3.1 2024 and 2026 Compliance Analysis

The 2026 compliance review indicates that Texas electric entities generally maintained strong documentation of core 16 TAC §25.53 requirements, with several notable improvements from the 2024 review cycle. Key gains were observed in documentation of the executive summary requirement, which increased to 86%, continuous EOP maintenance, which reached 92%, emergency contact information, which reached 92%,

[21] Following review of a targeted 10% validation sample of entities with a 2024 compliant determination and a 2026 non-compliant determination for Hurricane Annex requirements, 2026 compliance results were recalculated based on scoring patterns observed within the sample, particularly those associated with the treatment of self-declared N/A responses.
[22] Only evidence of Flood Annex information was evaluated and not an entity's self-evaluation of applicability.

and training attestation for relevant personnel, which reached 93%. These improvements suggest stronger documentation consistency across foundational EOP requirements; however, year-over-year comparisons should be interpreted in light of the amended 2026 refiling requirements, expanded documentation expectations, and changes in the review population. As a result, the comparison should be viewed as a directional indicator of filing completeness and documentation consistency, not as a direct measure of changes in operational preparedness or emergency response capability.

Table 6 presents 2024 and 2026 compliance results for submitted filings.

The comparison of compliance rates is based on full EOP submissions from both the 2024 and 2026 review cycles. However, because the 2024 filing requirements allowed entities to submit either a full EOP or an affidavit certifying no material changes, while the 2026 requirements generally required entities to comprehensively refile their EOPs, a comparison limited only to full EOP submissions would not provide an equivalent basis for year-over-year analysis. To support a more consistent comparison, the 2026 analysis includes the 838 entities that submitted full EOPs, along with the 2024 checklist review results for the additional 88 entities that submitted affidavit-only filings in 2026. This approach provides a more comparable view of overall compliance trends across the two review cycles.

Moreover, percentages presented in Tables 5 and 6 are calculated based on the submitted EOPs and included affidavit-only filings used for the comparison analysis, rather than the full population of applicable electric entities. If the total applicable entity population were used as the denominator, the reported compliance percentages would be lower. Accordingly, the results and related analysis should be read as a comparison of reviewed submissions, not as population-wide compliance rates.

Table 6. 2024 and 2026 Compliance Analysis

16 TAC § 25.53	Description	2024 (n=691)	2026 (n=926)
(c) (1) (i)	Executive Summary[23]	84%	86%
(c) (3)	Continuous Maintenance of EOP	90%	92%
(c) (4) (A)	Record of Distribution	61%	76%
(c) (4) (B)	Emergency Contacts	77%	92%
***(c) (4) (C)** Signed Affidavit from Entity's Highest-Ranking Representative Affirming the Following:*			
(c) (4) (C) (i)	Relevant Personnel are Familiar With and have Received Training on the EOP	93%	93%
(c) (4) (C) (ii)	Reviewed and Approved by Appropriate Executives	96%	92%

[23] It should be noted that the Executive Summary comparison between 2024 and 2026 is not directly comparable, as the Executive Summary requirements became more detailed following the 2025 amendments to 16 TAC §25.53. In 2026, entities were required to submit Executive Summaries using a prescribed format, whereas no equivalent standardized format was required in 2024. As a result, although the observed increase was only 2%, the improvement is more significant than the data alone suggests, as the 2026 compliance rate reflects entities that submitted clear, standardized Executive Summaries in the required format.

16 TAC § 25.53	Description	2024 (n=691)	2026 (n=926)
(c) (4) (C) (iii)	Drills Have Been Conducted to the Extent Required	93%	93%
(c) (4) (C) (iv)	Distributed to Local Jurisdictions	70%	81%
(c) (4) (C) (v)	Business Continuity Plan	88%	93%
(c) (4) (C) (vi)	Personnel Training (IS-100, IS-200, IS-700, IS-800 NIMS)	72%	86%
(d) (1) (A)	Approval and Implementation Section Introduction	92%	96%
(d) (1) (A)	Outline of Applicability	95%	96%
(d) (1) (B)	List of Individuals Responsible for Maintaining and Implementing EOP	79%	92%
(d) (1) (B)	List of Individuals who Can Change EOP	75%	86%
(d) (1) (C)	Revision Control Summary	88%	96%
(d) (1) (D)	Dated Statement of Approval Adopting the Plan and Superseding Previous Plan	93%	97%
(d) (1) (D)	Most Recent Approval Date	98%	84%
(d) (2)	Communication Plan	90%	84%
(d) (4)	Staffing	94%	94%
(d) (5)	Identification of weather-related hazards and activation of EOP	89%	94%
(e) (1) (A)	Weather Emergency Annex (T&D)	83%	89%
(e) (1) (A)	Cold Weather	83%	89%
(e) (1) (A)	Hot Weather	81%	87%
(e) (1) (B)	Load Shed Annex (T&D)	94%	92%
(e) (1) (D)	Wildfire Annex (T&D)	97%	92%
(e) (1) (E)	Hurricane Annex (gen, T&D, REP)	87%	87%
(e) (1) (H)	Flood Annex	N/A[24]	84%
(e) (3) (A)	Weather Emergency Annex (PGC)	95%	95%
(e) (3) (A)	Cold Weather	95%	95%
(e) (3) (A)	Hot Weather	91%	92%
(e) (3) (B)	Water Shortage Annex (gen only)	68%	68%
(e) (3) (C)	Restoration of Service Annex (gen only)	84%	90%
(e) (3) (E)	Hurricane Annex (gen, T&D, REP)	86%	87%
(e) (4) (B)	Hurricane Annex (gen, T&D, REP)	74%	77%

Stronger Baseline EOP Documentation

The largest increases from 2024 to 2026 were observed in foundational EOP governance, maintenance, training, and distribution elements, with improvements ranging from 8 to 15 percentage points.

Emergency Contacts and Record of Distribution experienced the greatest gains, each increasing by 15 percentage points (77% to 92% and 61% to 76%, respectively). Personnel Training (IS-100, IS-200, IS-700, and IS-800 NIMS) increased by 14

[24] Flood Annex was not a requirement within 16 TAC §25.53 in 2024

percentage points (72% to 86%), while the List of Individuals Responsible for Maintaining and Implementing the EOP increased by 13 percentage points (79% to 92%). Additional notable improvements were observed in Distributed to Local Jurisdictions and the List of Individuals Who Can Change the EOP, both of which increased by 11 percentage points, and the Revision Control Summary, which increased by 8 percentage points (88% to 96%).

These results indicate stronger documentation of key EOP governance and administrative requirements in 2026, suggesting improved plan maintenance, accountability, distribution, and personnel preparedness across submitting entities.

Mixed Results for Plan Approvals and Communication Planning

While most governance and administrative elements improved between 2024 and 2026, a few plan maintenance and communication-related requirements showed lower performance among submitted filings, suggesting less consistent documentation of certain EOP maintenance activities.

The most notable declines were observed for the Most Recent Approval Date, which decreased from 98% to 84% among submitted filings, and the Communication Plan, which decreased from 90% to 84%. These results should not be read as a broad failure in communication planning, but they do indicate that documentation quality among reviewed filings was less consistent in 2026 for certain plan-maintenance and communication elements.

Annex-Specific Compliance Trends

Annex-specific compliance was generally strong in 2026, with the largest improvements observed in weather-related and restoration annexes. Additionally, the newly required Flood Annex demonstrated a high level of adoption in its first review cycle. The Flood Annex, which was introduced as a new requirement through the 2025 amendments to 16 TAC §25.53, achieved a 84% compliance rate among submitted filings in 2026.

Given that 2026 was the first review cycle in which entities were required to address this annex, the results indicate a strong initial level of compliance with the new requirement.

Overall, the results suggest continued improvement in the documentation of weather-related response procedures and service restoration planning, while also demonstrating substantial adoption of newly introduced regulatory requirements.

3.2 Non-Submissions for 2026

Guidehouse identified 1,131 registered electric entities for which 16 TAC §25.53 is applicable and an EOP must be submitted. Out of the 926 submissions, 838 were complete EOP filings, representing 74% of the applicable population. The remaining

population consisted of 88 entities with an affidavit submission and 205 entities with no filing available by the cutoff date.[25]

Non-submission limits the PUCT's ability to review required EOP elements and assess the completeness and adequacy of entity-level emergency preparedness. Additionally, it reduces statewide comparability by constraining a consistent evaluation of readiness across entities.

Table 7 represents the breakdown of the electric entities registered with the PUCT that did not provide EOP submissions for 2026 with a side-by-side comparison of 2024 figures.

Table 7. Non-submissions by Type and Risk Identification

Entity Type	Total		Entity Risk Rating					
			High		Medium		Low	
	2024	2026	2024	2026	2024	2026	2024	2026
MOU/Co-op	10	16	0	0	0	1	10	15
PGC	229	165	0	0	6	4	224	161
REP	58	23	0	0	0	2	58	21
IOU	0	0	0	0	0	0	0	0
RA	0	1	0	0	0	0	0	1
Total	297	205	0	0	5	7	292	198

Of the 205 entities that did not submit EOPs or an affidavit in 2026, 165 (80%) were PGCs, 23 were REPs, 16 were MOUs/Co-ops, and one was an RA. Most non-submissions were associated with entity types that either have limited direct infrastructure responsibilities or were otherwise classified as lower risk. For example, the Co-ops that did not submit EOPs are solely responsible for distribution service to a small number of customers, while REPs do not own or operate electric infrastructure and are responsible for selling electric energy to retail customers.

The majority of 2026 non-submissions were registered PGCs. However, 161 of the 165 PGC non-submissions (98%) were categorized as low-risk entities, indicating that the overall non-submission population was concentrated among entities with comparatively limited reliability and emergency preparedness impacts. In addition, some PGC non-submissions may be due to registration revocations or other registration status changes that occurred after the review cutoff date of April 15, 2026.

[25] Per amended 16 TAC §25.53 filing requirements, all applicable entities were encouraged to comprehensively refile their EOPs in 2026 as part of the required three-year refiling cycle. Out of the 88 entities with Affidavit-only filings in 2026, 36 entities still met this requirement given their prior complete EOP submission was within the last three years.

4. Weather Emergency Preparedness Findings

To assess EOP maturity and develop ratings for electric entities, Guidehouse applied a risk-based framework across all entities and conducted a detailed review of 50 of the submitted EOPs against emergency weather preparedness best practices that extend beyond the requirements of 16 TAC §25.53. The evaluation employed a hybrid sampling methodology comprising a total sample of 50 entities, including all 37 entities reviewed in 2024 to support year-over-year comparisons, five newly identified high-risk entities in 2026, and eight randomly selected medium- and low-risk entities.

Across this sample, entities indicated relative maturity in incident command structure, staffing, training and drills, situational awareness, EOP activation, and public communications. Lower or more variable maturity was observed in areas such as asset management and inspections, risk management, mutual assistance, system design and hardening, communication systems, and emergency management technologies. These findings suggest that the core planning and response elements needed to support weather emergency preparedness are broadly established across the reviewed entities, while opportunities remain to strengthen documentation, coordination, infrastructure-focused planning, and use of tools and systems that support operational execution during extreme weather events.
Guidehouse assigned a maturity rating of **1, 2, or 3** for each indicator to assess the quality of an entity's preparedness and response planning for adverse weather events (e.g., extreme cold, extreme heat, hurricanes).

- **1 (Low Maturity):** Limited or missing required content; only basic practices described.
- **2 (Medium Maturity):** Key preparedness practices are present, but some essential elements are missing.
- **3 (High Maturity):** Demonstrates advanced level of preparedness and operational response, incorporating all required criteria associated with each indicator

Detailed indicator definitions and scoring criteria are provided in **Appendix B: Assessment Framework Maturity Matrix**.

4.1 Overview of Findings

Across the 12 preparedness indicators, average maturity scores ranged from 1.5 to 2.6 on a three-point scale, with an overall average of approximately 2.2. The strongest

documented capabilities were observed in Public Communications, Situational Awareness, Activation of the EOP, ICS Structure, and Staffing, indicating that most reviewed entities provided sufficient documentation of core response functions such as external communications, weather and system monitoring, emergency plan activation, governance structures, and assignment of roles and responsibilities.

This section presents the results separately for entities operating within the ERCOT power region and those operating outside ERCOT. Guidehouse also conducted a holistic review of the sampled EOPs to identify areas of relative strength and opportunities for improvement across the preparedness indicators. In this context, improvement refers to providing more comprehensive, structured, and specific documentation demonstrating how entities prepare for, respond to, and recover from adverse weather events.

These findings should be interpreted as an assessment of documented preparedness rather than a comprehensive evaluation of operational readiness or grid performance. EOPs are planning documents that describe procedures, policies, instructions, and preparedness-related activities; they do not necessarily demonstrate actual implementation, activation, or effectiveness during an emergency. In addition, certain factors that influence grid performance during extreme weather events - such as resource adequacy, weatherization, system hardening, and availability of spare critical inventory - are outside the scope of the EOP review. While 16 TAC §25.53 and the submitted EOPs establish an important foundation for extreme weather preparedness, review of EOP documentation alone may not provide sufficient implementation evidence to fully assess the ability of the grid to operate, respond, and recover during an actual weather emergency.

Section 4.4 Indicator and Annex-Specific Findings provides a deeper analysis of these scores and examines the common characteristics, practices, and levels of detail observed in high-scoring EOPs compared to relatively low-scoring EOPs across different annexes.

Key Changes since 2024

Compliance assessment for the 2026 review cycle applied the same evaluation criteria used in the 2024 review. To promote consistency, reviewers in the 2026 assessment were assigned responsibility for reviewing specific annexes and indicators across all sampled EOPs rather than reviewing individual entities in their entirety. This approach helped improve consistency in the application of evaluation criteria across submissions; however, as with any qualitative assessment, a degree of reviewer judgment remains and may contribute to minor differences in scoring between assessment cycles.

Compared to the 2024 assessment, 10 of the 12 indicators improved, suggesting a general increase in the level of information provided within EOP submissions. **Table 8** compares entity-level compliance results between 2024 and 2026. Because the 2026 sample included 37 entities that were also reviewed in 2024, plus an additional 13 entities, this comparison is limited to the 37 entities common to both years to ensure a

like-for-like assessment. A separate analysis comparing the full 2024 and 2026 samples (37 versus 50 entities) was also conducted and showed similar overall trends.

Table 8. 2024 and 2026 Deep Dives – Average Maturity Ratings Comparison (n=37)

	Indicator	2024 Average	2026 Average	Difference
1	Staffing	2.0	2.4	0.4
2	Emergency Management Systems & Tech	1.4	1.7	0.3
3	System Design & Hardening	1.3	1.5	0.2
4	Incident Command System (ICS)	2.1	2.4	0.3
5	Risk Management	1.9	2.1	0.2
6	Mutual Assistance & Support	1.9	2.0	0.1
7	Training & Emergency Drills	2.0	2.1	0.1
8	Situational Awareness	2.5	2.6	0.1
9	Public Communications	2.5	2.6	0.1
10	Activation of EOP	2.4	2.4	0.0
11	Communication Systems	2.3	2.2	-0.1
12	Asset Management & Inspections	2.2	2.0	-0.2

While the assessment methodology, scoring rubric, and indicator definitions remained consistent between the 2024 and 2026 reviews, direct year-over-year comparisons should be interpreted with appropriate consideration for the following:

- These findings are based on a relatively small sample of entities and are intended to provide directional insights rather than statistically significant conclusions. The results should therefore be viewed as indicators of broad trends in EOP content and maturity, rather than definitive evidence of system-wide improvement or decline.
- The analysis reflects the quality and level of detail documented in submitted EOPs, not necessarily the actual operational capabilities of the entities. In some cases, changes in scores may reflect differences in documentation practices rather than changes in preparedness activities.

- Some variation may also be attributable to differences in reviewer interpretation and scoring judgment, despite the use of standardized review criteria.

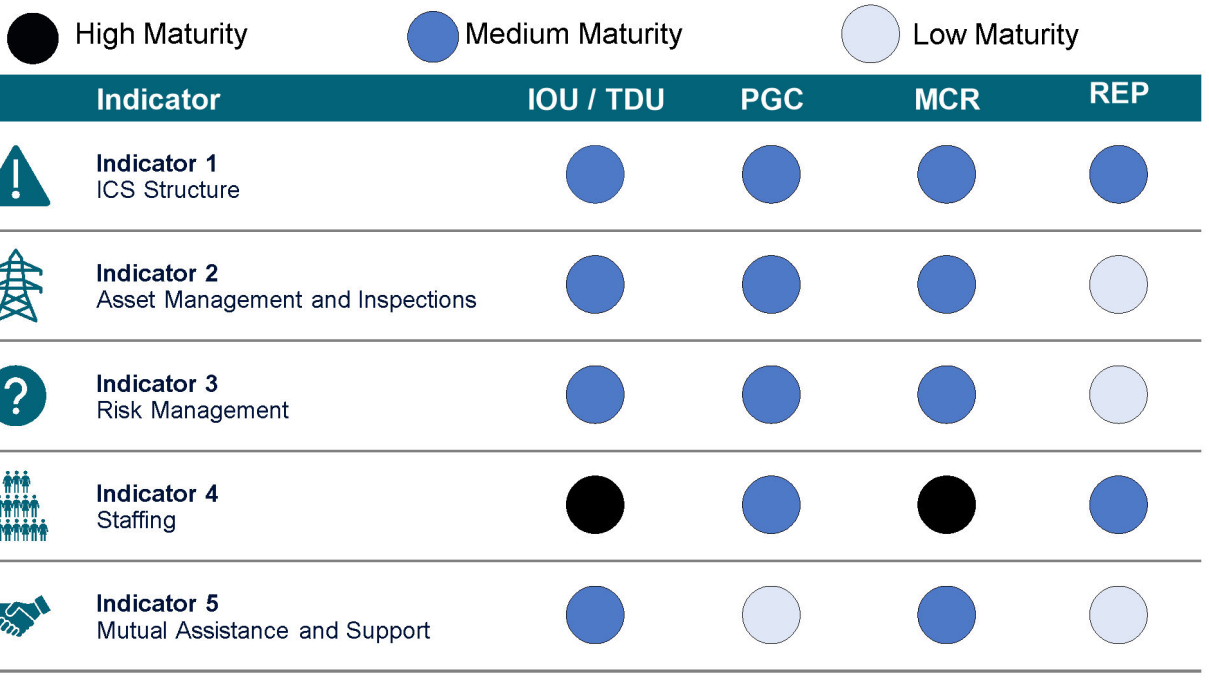
Taken together, the comparison is most useful for identifying common strengths, recurring gaps, and areas where additional guidance and enhanced documentation practices could improve EOP quality and consistency.

4.1.1 ERCOT Power Region Findings Overview

This section includes a high-level overview of the maturity ratings that Guidehouse generated based on its review of the EOPs submitted to the PUCT by electric entities that operate within the ERCOT power region.[26] The maturity assessment is an additional review beyond the scope of 16 TAC §25.53. Guidehouse averaged these ratings to generate one risk score for each indicator and an overall rating for the three entity categories, as shown in **Table 9**.

Further findings associated with each of the indicators that contributed to these average risk ratings are detailed in **Section 4.3 ERCOT Power Region: Findings by Entity Type**.

Table 9. Emergency Preparedness Average Maturity Ratings for ERCOT Power Region Entities (n=35)



[26] A rating of 1 (low maturity) signals that an indicator lacks the required content or contains good business practices with minimal details provided. A rating of 2 (medium maturity) establishes that key elements of good business practices for weather emergency preparedness and response are present, but some essential elements are missing. A rating of 3 (high maturity) indicates that the EOP demonstrated advanced level of preparedness and operational response, incorporating all required criteria associated with each indicator.

	Indicator	IOU / TDU	PGC	MCR	REP
	Indicator 6 Training and Emergency Drills	●	●	●	○
	Indicator 7 Situational Awareness	●	●	●	●
	Indicator 8 System Design and Hardening	○	○	○	○
	Indicator 9 Communication System	○	●	●	●
	Indicator 10 Activation of EOP	●	●	●	●
	Indicator 11 Emergency Management and Planning Systems, Technologies, and Automation	●	○	○	○
	Indicator 12 Public Communications	●	●	●	●
	Average Ratings	●	●	●	○

4.1.2 Non-ERCOT Power Regions Findings Overview

This section includes a high-level overview of the maturity ratings that Guidehouse generated based on its review of the EOPs submitted to the PUCT by electric entities that operate outside of the ERCOT power region. The evaluation team reviewed a sample of EOPs and assigned maturity ratings for each of the emergency preparedness indicators. Guidehouse averaged these ratings into one risk score for each indicator, as shown in **Table 10**, to establish confidentiality of the information provided for the small number of entities that operate outside of the ERCOT power region.

Further findings associated with each of the emergency preparedness indicators that contributed to these average maturity ratings are further detailed in Section **4.3 Non-ERCOT Power Regions: Findings**.

Table 10. Emergency Preparedness Average Maturity Ratings for Non-ERCOT Power Regions Entities (n=15)[27]

● High Maturity ● Medium Maturity ○ Low Maturity

Indicator	Maturity Level
Indicator 1 ICS Structure	●
Indicator 2 Asset Management and Inspections	○
Indicator 3 Risk Management	●
Indicator 4 Staffing	●
Indicator 5 Mutual Assistance and Support	○
Indicator 6 Training and Emergency Drills	●
Indicator 7 Situational Awareness	●
Indicator 8 System Design and Hardening	○
Indicator 9 Communication System	●
Indicator 10 Activation of EOP	●
Indicator 11 Emergency Management and Planning Systems, Technologies, and Automation	○
Indicator 12 Public Communications	●
Average Rating	●

[27] Given the limited number of entities in the non-ERCOT power regions, we are only displaying the data in the aggregate rather than by entity type. In the ERCOT data, there are enough entities such that differentiating by entity type (PGC, IOU, MCR) showed meaningful differences. In addition, for non-ERCOT entities Guidehouse averaged these ratings into one risk score for each indicator to maintain confidentiality of the information provided for the smaller number of entities that operate outside of the ERCOT power region.

4.2 ERCOT Power Region: Findings by Entity Type

ERCOT comprises approximately 90% of the electric load in Texas and covers approximately 75% of the land mass of Texas.[28] As such, most electric entities are in this power region and thus a majority of the high risk and medium risk entities are in the ERCOT power region. The following sections include the findings associated with Guidehouse's review of the EOPs provided by the electric entities that operate in the region managed by ERCOT.

4.2.1 Investor-Owned Utilities (IOUs)

The following table provides a summary of the findings based on Guidehouse's review of a sample of eight EOPs provided by the IOUs and transmission and distribution entities that operate in the ERCOT power region.

Table 11. IOUs EOP Findings (n=8)

● High Maturity ● Medium Maturity ● Low Maturity

Indicator	Summary of Findings	Maturity Level
Indicator 1 – ICS Structure	• Most reviewed EOPs established formal ICS structures aligned with emergency management principles and clearly defined emergency-response roles and responsibilities. • Higher-scoring EOPs demonstrated scalable command structures, formal governance processes, defined decision-making authority, and documented continuous-improvement mechanisms, while lower-scoring EOPs provided less detail regarding command structures and lessons-learned processes.	●
Indicator 2 – Asset Management and Inspections	• Most reviewed EOPs documented inspection, maintenance, vegetation management, and weatherization activities. • Higher-scoring EOPs identified critical assets, inspection priorities, and readiness activities, while lower-scoring EOPs provided limited information regarding critical asset inventories, potential failure points, spare equipment, and remediation procedures.	●
Indicator 3 – Risk Management	• Most reviewed EOPs identified weather-related hazards and described preparedness procedures for adverse weather events. • Higher-scoring EOPs incorporated formal weather monitoring processes, readiness assessments, hazard-specific preparedness actions, and documented mitigation procedures, while lower-scoring EOPs generally provided less detail regarding risk prioritization and corrective actions.	●
Indicator 4 – Staffing	• Staffing was well developed across reviewed EOPs, with clearly defined organizational structures and emergency-response responsibilities. • Higher-scoring EOPs documented scalable staffing models, alternate personnel, resource-acquisition responsibilities, and support functions for prolonged emergencies, while lower-scoring EOPs focused primarily on primary personnel assignments.	●

[28] Texas RE Info Sheet (https://www.texasre.org/Documents/General/Texas%20RE%20Info%20Sheet.pdf)

Indicator	Summary of Findings	Maturity Level
Indicator 5 – Mutual Assistance and Support	• Most reviewed EOPs referenced mutual assistance programs, contractors, and external coordination mechanisms. • Higher-scoring EOPs documented resource-request procedures and coordination processes, while lower-scoring EOPs provided limited details regarding resource mobilization, contractor integration, tracking, and demobilization procedures.	
Indicator 6 – Training and Emergency Drills	• Most reviewed EOPs documented annual drills, required training activities, and emergency-response exercises. • Higher-scoring EOPs demonstrated more mature corrective-action and lessons-learned processes, while lower-scoring EOPs focused primarily on compliance with training requirements.	
Indicator 7 – Situational Awareness	• Situational awareness was one of the strongest-performing indicators for IOUs. • Higher-scoring EOPs integrated weather forecasting, monitoring tools, GIS capabilities, outage-management systems, operational dashboards, and predefined escalation processes, while lower-scoring EOPs provided more limited descriptions of monitoring activities.	
Indicator 8 – System Design and Hardening	• A limited number of EOPs referenced weatherization, maintenance, and short-term preparedness activities. • Some of the higher-scoring EOPs documented infrastructure resilience initiatives and mitigation strategies, while lower-scoring EOPs provided limited information regarding long-term hardening efforts, investment planning, and measurable resilience improvements.	
Indicator 9 – Communication System	• Very few EOPs established internal communication responsibilities and notification procedures. • Some higher-scoring EOPs documented multiple communication methods and operational coordination processes, while lower-scoring EOPs provided limited information regarding backup communications and communication-failure contingencies.	
Indicator 10 – Activation of EOP	• Most reviewed EOPs documented activation authority, emergency-response levels, and escalation procedures. • Higher-scoring EOPs established clearly defined activation triggers and operational thresholds, while lower-scoring EOPs relied on more general activation guidance.	
Indicator 11 – Emergency Management and Planning Systems, Technologies, and Automation	• Reviewed EOPs increasingly referenced GIS, weather-monitoring systems, predictive analytics, and operational dashboards. • Higher-scoring EOPs explained how technologies support emergency response and decision-making, while lower-scoring EOPs often listed technologies without describing their operational application.	
Indicator 12 – Public Communications	• Public communications was one of the highest-scoring indicators. • Higher-scoring EOPs established communication protocols with customers, regulators, public officials, emergency agencies, and media through multiple communication channels, while lower-scoring EOPs provided less detailed stakeholder-specific communication procedures.	

4.2.2 Power Generation Companies (PGCs)

The following table provides a summary of the findings based on Guidehouse's review of a sample of 11 EOPs provided by the PGCs that operate in the ERCOT power region.

Table 12. PGCs EOP Findings (n=11)

High Maturity Medium Maturity Low Maturity

Indicator	Summary of Findings	Maturity Level
Indicator 1 – ICS Structure	• Most reviewed EOPs defined emergency-management roles and operational responsibilities. • Higher-scoring EOPs demonstrated more structured governance frameworks and emergency-response organization, while lower-scoring EOPs lacked formal ICS structures and continuous-improvement processes.	
Indicator 2 – Asset Management and Inspections	• Most reviewed EOPs documented winterization activities, equipment inspections, operational readiness assessments, and monitoring of critical equipment. • Higher-scoring EOPs provided more detailed readiness measures and maintenance procedures, while lower-scoring EOPs provided limited documentation of failure-point analysis, spare equipment strategies, and remediation processes.	
Indicator 3 – Risk Management	• Most reviewed EOPs included procedures addressing weather readiness, operational risks, and equipment reliability. • Higher-scoring EOPs documented comprehensive preparedness and remediation procedures for severe-weather scenarios, while lower-scoring EOPs relied on more general risk-management language.	
Indicator 4 – Staffing	• Most reviewed EOPs identified personnel responsible for emergency preparedness and operational readiness. • Higher-scoring EOPs documented additional staffing resources and emergency-response responsibilities, while lower-scoring EOPs provided limited information regarding backup staffing and surge-capacity planning.	
Indicator 5 – Mutual Assistance and Support	• Mutual assistance was one of the weaker areas across reviewed EOPs. • Higher-scoring EOPs documented coordination with contractors, affiliates, or external organizations, while lower-scoring EOPs provided limited evidence of formal mutual-aid arrangements and resource-coordination procedures.	
Indicator 6 – Training and Emergency Drills	• Most reviewed EOPs documented training activities, exercises, and emergency-response preparedness requirements. • Higher-scoring EOPs included more structured training and exercise programs, while lower-scoring EOPs provided less evidence of corrective-action tracking and lessons-learned implementation.	

Indicator	Summary of Findings	Maturity Level
Indicator 7 – Situational Awareness	• Situational awareness was among the strongest-performing indicators. • Higher-scoring EOPs incorporated weather monitoring, forecasting tools, operational monitoring systems, and readiness assessments, while lower-scoring EOPs provided more limited monitoring detail.	
Indicator 8 – System Design and Hardening	• Most reviewed EOPs focused on seasonal preparedness and weatherization activities at a high level only. • Higher-scoring EOPs documented some infrastructure protection measures, while lower-scoring EOPs provided little discussion of long-term resilience investments and hardening strategies.	
Indicator 9 – Communication System	• Most reviewed EOPs documented operational communications with regulators, grid operators, and internal personnel. • Higher-scoring EOPs established primary and backup communication methods, while lower-scoring EOPs provided more limited communication-contingency planning.	
Indicator 10 – Activation of EOP	• Most reviewed EOPs established conditions requiring readiness and response actions. • Higher-scoring EOPs included detailed escalation criteria and activation procedures, while lower-scoring EOPs relied on broader activation guidance.	
Indicator 11 – Emergency Management and Planning Systems, Technologies, and Automation	• Technology and automation remained a lower-scoring area. • Higher-scoring EOPs described monitoring systems and operational tools, while lower-scoring EOPs provided limited information regarding technology-enabled emergency management and decision-making processes.	
Indicator 12 – Public Communications	• Most reviewed EOPs established communication protocols with regulators, public officials, and media organizations. • Higher-scoring EOPs documented clear communication responsibilities and procedures, while lower-scoring EOPs provided less detail regarding stakeholder engagement processes.	

4.2.3 Municipally Owned Utilities, Electric Cooperatives, and River Authorities (MOUs, Co-ops, RAs)

The following table provides a summary of the findings based on Guidehouse's review of a sample of 11 EOPs provided by the MOUs, Co-ops, and RAs that operate in the ERCOT power region.

Table 13. Municipally Owned Utilities, Electric Cooperatives, and River Authorities EOP Findings (n=11)

● High Maturity ● Medium Maturity ● Low Maturity

Indicator	Summary of Findings	Maturity Level
Indicator 1 – ICS Structure	• Most reviewed EOPs documented emergency-management structures, incident leadership, and decision-making responsibilities. • Higher-scoring EOPs provided more formalized governance frameworks and command relationships, while lower-scoring EOPs documented fewer organizational details and continuous improvement processes.	●
Indicator 2 – Asset Management and Inspections	• Most reviewed EOPs documented inspection, maintenance, restoration, and weather-readiness activities. • Higher-scoring EOPs provided greater detail regarding critical assets and preparedness activities, while lower-scoring EOPs lacked comprehensive asset inventories, vulnerability assessments, and spare-equipment strategies.	●
Indicator 3 – Risk Management	• Risk-management practices varied across reviewed EOPs. • Higher-scoring EOPs incorporated hazard-specific preparedness actions, readiness procedures, and operational response activities, while lower-scoring EOPs relied more heavily on high-level preparedness language.	●
Indicator 4 – Staffing	• Staffing was one of the strongest performing indicators. • Most reviewed EOPs clearly identified emergency-response personnel, responsibilities, and support functions necessary during major events.	●
Indicator 5 – Mutual Assistance and Support	• Most reviewed EOPs documented participation in cooperative support networks and external coordination arrangements. • Higher-scoring EOPs provided clearer resource-sharing and coordination procedures, while lower-scoring EOPs documented more limited operational detail.	●
Indicator 6 – Training and Emergency Drills	• Training requirements and exercise activities were commonly documented. • Higher-scoring EOPs incorporated corrective-action tracking and continuous-improvement activities, while lower-scoring EOPs focused primarily on training compliance.	●

Indicator	Summary of Findings	Maturity Level
Indicator 7 – Situational Awareness	• Situational awareness was one of the strongest-performing indicators. • Higher-scoring EOPs established weather monitoring, activation thresholds, hazard-identification processes, and structured monitoring activities supporting emergency decision-making.	
Indicator 8 – System Design and Hardening	• Most reviewed EOPs emphasized seasonal readiness rather than long-term resilience planning. • Higher-scoring EOPs documented some mitigation activities, while lower-scoring EOPs provided limited information regarding infrastructure hardening and resilience investments.	
Indicator 9 – Communication System	• Most reviewed EOPs documented communication responsibilities and coordination procedures. • Higher-scoring EOPs established multiple communication pathways, while lower-scoring EOPs provided limited information regarding backup communication capabilities.	
Indicator 10 – Activation of EOP	• Activation of EOP was one of the highest-performing indicators. • Higher-scoring EOPs documented activation thresholds, emergency levels, escalation procedures, and responsible decision-makers, while lower-scoring EOPs relied on broader activation language.	
Indicator 11 – Emergency Management and Planning Systems, Technologies, and Automation	• Technology and automation remained one of the lowest-scoring maturity areas. • Higher-scoring EOPs described operational systems and monitoring tools, while lower-scoring EOPs provided limited explanation of how technologies support emergency operations.	
Indicator 12 – Public Communications	• Public communications was among the strongest performing indicators. • Most reviewed EOPs provided communication procedures for customers, regulators, emergency agencies, public officials, and media organizations through multiple communication channels.	

4.2.4 Retail Electric Providers (REPs)

The following table provides a summary of the findings based on Guidehouse's review of a sample of five EOPs provided by the REPs that operate in the ERCOT power region. It should be noted that the maturity assessment framework includes certain indicators that are primarily intended for entities with physical infrastructure assets or direct operational control. As REPs generally do not possess these characteristics,

some lower-scoring indicators may not be directly applicable and should be interpreted within the context of the REP operating model and responsibilities.

Table 14. Retail Electric Providers EOP Findings (n=5)

● High Maturity ● Medium Maturity ● Low Maturity

Indicator	Summary of Findings	Maturity Level
Indicator 1 – ICS Structure	• Maturity varied significantly across reviewed EOPs. • Higher-scoring EOPs documented structured emergency-management and business-continuity processes, while lower-scoring EOPs contained limited emergency-management detail.	●
Indicator 2 – Asset Management and Inspections	• Because REPs generally do not own generation or delivery infrastructure, asset-management content was limited. • Most EOPs focused on business continuity rather than operational infrastructure preparedness.	●
Indicator 3 – Risk Management	• Risk-management activities primarily focused on continuity of operations and external disruptions affecting service obligations. • Higher-scoring EOPs incorporated preparedness measures and decision-making processes, while lower-scoring EOPs provided less detailed hazard-specific planning.	●
Indicator 4 – Staffing	• Most reviewed EOPs identified personnel responsible for emergency-response and continuity functions. • Higher-scoring EOPs documented staffing responsibilities in greater detail, while lower-scoring EOPs provided limited backup-staffing and succession-planning information.	●
Indicator 5 – Mutual Assistance and Support	• Most EOPs relied on vendor coordination and external support arrangements rather than traditional mutual-aid structures. • Higher-scoring EOPs documented coordination procedures and support mechanisms, while lower-scoring EOPs provided limited operational detail.	●
Indicator 6 – Training and Emergency Drills	• Training activities were documented at a high level. • Higher-scoring EOPs demonstrated greater evidence of exercises and preparedness activities, while lower-scoring EOPs provided limited evidence of formal drills and continuous improvement processes.	●
Indicator 7 – Situational Awareness	• Situational awareness was one of the highest-performing indicators among reviewed EOPs. • Higher-scoring EOPs documented monitoring activities, defined decision triggers, and continuity-focused awareness processes, while lower-scoring EOPs relied on more general monitoring practices.	●

Indicator	Summary of Findings	Maturity Level
Indicator 8 – System Design and Hardening	• System design and hardening represented the lowest-scoring indicator. • Because REPs do not own transmission or generation infrastructure, EOPs contained limited discussion of physical resilience and infrastructure-hardening measures.	
Indicator 9 – Communication System	• Most reviewed EOPs identified internal communication processes and operational coordination procedures. • Higher-scoring EOPs documented continuity-focused communication arrangements, while lower-scoring EOPs provided limited backup communication detail.	
Indicator 10 – Activation of EOP	• Most reviewed EOPs documented activation authority and continuity-response triggers. • Higher-scoring EOPs established more clearly defined escalation procedures and emergency levels.	
Indicator 11 – Emergency Management and Planning Systems, Technologies, and Automation	• Technology and automation maturity was limited. • Higher-scoring EOPs described operational systems supporting continuity functions, while lower-scoring EOPs provided little evidence of technology-enabled emergency management capabilities.	
Indicator 12 – Public Communications	• Public communications was among the strongest indicators. • Higher-scoring EOPs documented customer-notification procedures, media engagement processes, and communication responsibilities during emergencies, while lower-scoring EOPs provided more limited stakeholder-specific procedures.	

4.3 Non-ERCOT Power Regions: Findings for All Entities

The following table provides a summary of detailed findings based on Guidehouse's review of the EOPs provided by 15 IOUs, PGCs as well as MOUs, Co-ops, and RAs that operate outside of the ERCOT region.

Table 15. Emergency Preparedness Findings for Non-ERCOT Entities (n=15)

High Maturity | Medium Maturity | Low Maturity

Indicator	Summary of Findings	Maturity Level
Indicator 1 – ICS Structure	• Most reviewed non-ERCOT EOPs established emergency-management structures, identified key response personnel, and documented roles and responsibilities during emergency events. • Higher-scoring EOPs demonstrated formalized command structures, clearly defined decision-making authority, and documented escalation and governance procedures, while lower-scoring EOPs provided more limited detail regarding incident management frameworks and continuous-improvement processes.	Medium
Indicator 2 – Asset Management and Inspections	• Asset management and inspections was one of the lowest-scoring indicators among Non-ERCOT entities. • Higher-scoring EOPs documented inspection programs, weatherization activities, equipment maintenance procedures, and critical asset considerations, while lower-scoring EOPs lacked detailed asset inventories, identification of critical infrastructure, failure-point analyses, spare-equipment strategies, and remediation procedures.	Low
Indicator 3 – Risk Management	• Most EOPs identified weather-related and operational risks and described preparedness measures for adverse events. • Higher-scoring EOPs included hazard-specific planning, risk-monitoring activities, and mitigation measures, while lower-scoring EOPs relied on broader preparedness language with limited discussion of risk prioritization and corrective actions.	Medium
Indicator 4 – Staffing	• Most EOPs identified key personnel and staffing responsibilities during emergencies. • Higher-scoring EOPs documented scalable staffing strategies, alternate personnel, and resource-management functions, while lower-scoring EOPs focused primarily on basic staffing assignments.	Medium
Indicator 5 – Mutual Assistance and Support	• Mutual assistance and support was among the weaker-performing indicators. • Higher-scoring EOPs documented coordination with contractors, cooperatives, or external partners and established resource-request procedures, while lower-scoring EOPs provided limited detail regarding mutual-assistance agreements, resource mobilization, tracking, and demobilization processes.	Low
Indicator 6 – Training and Emergency Drills	• Most EOPs documented training requirements and emergency exercises. • Higher-scoring EOPs incorporated lessons learned, corrective-action tracking, and continuous-improvement processes, while lower-scoring EOPs primarily documented required training activities.	Medium

Indicator	Summary of Findings	Maturity Level
Indicator 7 – Situational Awareness	• Situational awareness was the highest-scoring indicator among Non-ERCOT entities. • Higher-scoring EOPs documented weather monitoring, operational awareness activities, alert thresholds, and decision-support processes, while lower-scoring EOPs provided less detail regarding monitoring and escalation procedures.	
Indicator 8 – System Design and Hardening	• System design and hardening was the lowest-scoring indicator among Non-ERCOT entities. • Higher-scoring EOPs documented weatherization activities and selected resilience measures, while lower-scoring EOPs provided little or no information regarding infrastructure hardening, resilience investments, long-term mitigation planning, or measurable risk-reduction initiatives.	
Indicator 9 – Communication System	• Most EOPs identified communication responsibilities and coordination procedures during emergency events. • Higher-scoring EOPs documented multiple communication methods and backup communication capabilities, while lower-scoring EOPs provided limited communication redundancy and contingency planning.	
Indicator 10 – Activation of EOP	• Most EOPs documented activation authority and response procedures. • Higher-scoring EOPs established specific activation thresholds, emergency levels, and escalation criteria, while lower-scoring EOPs relied on more general activation guidance.	
Indicator 11 – Emergency Management and Planning Systems, Technologies, and Automation	• Technology and automation was one of the lower-scoring indicators. • Higher-scoring EOPs described operational technologies supporting situational awareness and emergency decision-making, while lower-scoring EOPs provided limited discussion of systems, tools, automation capabilities, and technology-enabled response processes.	
Indicator 12 – Public Communications	• Public communications was among the highest-scoring indicators. • Higher-scoring EOPs documented communication procedures for customers, regulators, public officials, emergency agencies, and media organizations using multiple communication channels, while lower-scoring EOPs provided less detailed stakeholder-specific communication procedures.	

4.4 Indicator and Annex-Specific Findings

Maturity Indicators' Performance Across EOPs

To provide additional insight into the quality and operational maturity of EOPs, Guidehouse evaluated how the sample EOPs performed overall across the 12 maturity indicators.

Overall, the review found that many entities demonstrated strong foundational emergency management capabilities, particularly in public communications, situational awareness, EOP activation, staffing, and incident command structure. These indicators received the highest average scores and were supported by clearly defined roles, established communication protocols, emergency response structures, and documented procedures for monitoring and responding to changing conditions.

Public Communications (2.6) and Situational Awareness (2.6) were the highest scoring indicators on average across all EOPs. Higher-scoring EOPs typically included detailed communication frameworks, stakeholder-specific outreach strategies, multiple communication methods, and documented processes for monitoring weather, system, and operational conditions. Entities also generally demonstrated well-defined activation procedures, staffing structures, and Incident Command System (ICS) frameworks, reflecting a strong emphasis on emergency coordination and response.

The indicators with the lowest average scores were Emergency Management (1.8) and Planning Systems (1.5). While many EOPs referenced technologies such as Geographic Information Systems (GIS), Outage Management Systems (OMS), Supervisory Control and Data Acquisition (SCADA), and other operational tools, documentation often focused on identifying the technologies rather than describing how they support decision-making and emergency operations during weather events. Similarly, many entities referenced resilience, reliability, weatherization, or infrastructure improvement efforts at a high level, but provided limited information regarding specific hardening initiatives, long-term resilience strategies, investment priorities, or measurable risk-reduction outcomes.

As noted in prior reports, many of these activities may occur through programs, processes, or regulatory requirements outside the scope of 16 TAC §25.53 EOP submissions.

Table 16. 2026 Deep Dives Results Summary (n=50)

	Indicator	2026 Average
1	Public Communications	2.6
2	Situational Awareness	2.6
3	Activation of EOP	2.4
4	Incident Command System (ICS)	2.4
5	Staffing	2.4
6	Communication Systems	2.2
7	Risk Management	2.1

	Indicator	2026 Average
8	Training & Emergency Drills	2.1
9	Mutual Assistance & Support	2.0
10	Asset Management & Inspections	2.0
11	Emergency Management Systems & Tech	1.8
12	System Design & Hardening	1.5

Across all indicators, a clear distinction emerged between EOPs that provided broad descriptions of emergency preparedness activities and those that functioned as operational response guides. Higher-scoring EOPs typically documented not only what actions would be taken during a weather emergency, but also how those actions would be executed, including activation thresholds, decision-making authorities, staffing requirements, communications procedures, restoration priorities, monitoring practices, and implementation responsibilities. In contrast, other EOPs frequently addressed the same topics at a higher level, providing general descriptions without the same degree of operational specificity.

Taken together, the results indicate that Texas electric entities maintain foundational emergency preparedness programs and have incorporated many of the key elements necessary to support weather emergency response. At the same time, the review identified opportunities to increase consistency and enhance the level of operational detail documented within EOPs, particularly in areas related to resilience planning, technology-enabled emergency management, asset readiness, mutual assistance coordination, and formal risk management processes.

Annex Review Findings

In addition to the assessment of the 12 emergency preparedness indicators, Guidehouse conducted a targeted review of specific annexes. The purpose of this analysis was to identify common characteristics associated with more comprehensive annexes and to understand how entities documented their preparedness, response, and recovery activities for these events.

Overall, the review found that the strongest annexes shared several common characteristics. These annexes moved beyond general descriptions of emergency planning and instead served as operational playbooks, providing clear activation criteria, defined roles and responsibilities, detailed response procedures, communications protocols, and recovery actions. More comprehensive annexes also demonstrated stronger integration with broader EOP components, including Incident Command System (ICS) structures, situational awareness processes, staffing plans, mutual aid coordination, and lessons learned programs.

Cold Weather Annex

The highest-quality cold weather annexes generally included:

- Detailed winterization activities, equipment inspection programs, freeze-protection measures, and seasonal readiness checklists to prepare facilities before freezing conditions.
- Measurable activation triggers, staffing assignments, and clearly defined emergency management roles and responsibilities.
- Restoration priorities, resource staging procedures, and mutual aid coordination activities to support an organized response.
- Robust weather monitoring processes and specific actions to be taken before, during, and after a cold weather event.

In contrast, many cold weather annexes were primarily narrative in nature and provided less operational specificity. Common themes included limited discussion of winterization activities, equipment readiness measures, activation thresholds, restoration priorities, and staffing escalation procedures. While many entities acknowledged cold weather risks and responses, the level of detail provided regarding how preparedness and response activities would be implemented varied.

Hot Weather Annex

The highest-quality hot weather annexes generally included:

- Equipment monitoring requirements and preparedness activities designed to maintain reliability during extended periods of extreme heat.
- Staffing, resource coordination, and communications procedures with clearly defined operational responsibilities.
- Operational triggers linked to weather conditions and system impacts to support timely decision-making.
- Structured and scalable response actions tailored to prolonged heat events and peak-demand conditions.

Across the sample population, many hot weather annexes focused primarily on business continuity concepts or general emergency response procedures rather than heat-specific operational considerations. Common opportunities for enhancement included documenting equipment monitoring procedures, peak-load management activities, operational triggers tied to weather conditions, staffing escalation procedures, and reliability-focused response measures designed specifically for prolonged extreme heat events.

Flood Annex

The strongest flood annexes generally included:

- Flood-specific risk assessments, flood mapping efforts, and identification of facilities vulnerable to flooding impacts.
- Defined monitoring thresholds and activation criteria tied to river levels, forecasts, or other flooding indicators.

- Comprehensive preparedness, response, and recovery actions to be implemented before, during, and after flood events.
- Infrastructure protection measures, stakeholder communications, external coordination procedures, and lessons learned activities.

Other flood annexes primarily acknowledged flooding as a potential hazard but provided limited documentation regarding operational preparedness and response measures. In several cases, flood-related content relied heavily on all-hazards emergency management language without identifying flood-specific actions, monitoring criteria, recovery procedures, or mitigation strategies. Some annexes provided only general descriptions of flooding risks without corresponding operational guidance.

Water Shortage Annex

The most comprehensive water shortage annexes generally included:

- A dedicated water shortage annex or section rather than brief references dispersed throughout the EOP.
- Defined drought and water shortage conditions, identified water sources and dependencies, and established monitoring and activation criteria.
- Alternative water supply strategies, conservation measures, and continuity planning actions to support operations during supply constraints.
- Preparedness activities, escalation procedures, defined organizational responsibilities, and actions to maintain operations during extended water shortages.

In contrast, many EOPs provided only limited discussion of water shortage risks. In several cases, drought conditions were mentioned briefly without a dedicated annex or accompanying operational procedures. Alternative water source planning, staffing considerations, communications protocols, resource coordination activities, monitoring thresholds, and recovery procedures were frequently limited or absent.

Across all annex types, the review identified a consistent distinction between annexes that described an event and annexes that documented a structured response to that event. More comprehensive annexes generally included:

- Specific activation thresholds and response levels.
- Clearly defined roles, responsibilities, and staffing expectations.
- Detailed operational procedures before, during, and after an event.
- Recovery planning, lessons learned, and continuous improvement activities.

Conversely, annexes with less detailed documentation often relied on general emergency management language, provided limited measurable activation criteria, and included fewer details regarding operational implementation, resource deployment, or post-event recovery activities.

These findings suggest that future EOP guidance could benefit from establishing more consistent expectations regarding the minimum content elements for weather-specific annexes. Greater emphasis on extreme event-specific procedures, activation

thresholds, operational decision-making, resource coordination, and recovery planning could help promote consistency across filings and improve the usefulness of annexes as operational response tools during weather emergencies.

5. Seasonal Weather Analysis for 2026 and 2027

Overview

Based on the available seasonal preparedness information, the ERCOT, Southwest Power Pool (SPP), and Midcontinent Independent System Operator (MISO) analyses generally indicate that electric system operators maintain documented planning and operating frameworks to support preparedness for extreme seasonal conditions, though each region evaluates preparedness through a different analytical lens. ERCOT's declarations-based analysis indicates that most transmission facilities and generation resources have demonstrated sustained operating capability under the winter and summer temperature conditions reflected in the Weather Emergency Preparedness rule. SPP's seasonal deliverability studies indicate that most registered generation capacity is deliverable to the broader SPP Balancing Authority footprint under modeled winter and summer conditions.[29][30] MISO's seasonal readiness materials indicate sufficient projected resources under baseline winter conditions, while emphasizing continued operational risk from weather variability, load uncertainty, and resource performance.[31][32]

These findings should be interpreted as supporting indicators of seasonal preparedness rather than as a single statewide determination of resource adequacy, grid reliability, or real-time performance during an actual extreme weather event. Actual system performance depends on demand levels, forced outages, equipment derates, fuel availability, transmission constraints, resource commitments, and real-time operating conditions. For ERCOT, the available analysis supports a temperature-threshold view of documented sustained operation. For SPP, the available analysis provides a transmission deliverability view of registered generation. For MISO, the available materials provide an operational-readiness view focused on flexibility, forecasting, reserves, and event-driven risk.

In accordance with Texas Utilities Code § 186.007, ERCOT performed an analysis of reporting data required by 16 TAC §25.55 and provided the results to the PUCT to support statewide seasonal preparedness considerations. Guidehouse also reviewed available seasonal information for entities outside the ERCOT power region, including materials from SPP and MISO, to provide additional context for non-ERCOT portions of Texas. Because ERCOT, SPP, and MISO use different methodologies and geographic

[29] SPP, "2025 Deliverability Study Winter Season Report", May 2026, https://www.spp.org/documents/74232/2025%20deliverability%20study%20winter%20season%20report.pdf

[30] SPP, "2026 Deliverability Study Summer Season Report", May 2026, https://www.spp.org/documents/75526/2026%20deliverability%20study%20summer%20season%20report.pdf.

[31] MISO, "Winter 2025-26 Winter Readiness Workshop", May 2026, https://cdn.misoenergy.org/20251029%20Winter%20Readiness%20Workshop%20Presentation723831.pdf.

[32] MISO, "Seasonal Readiness Workshop: Summer 2026", May 2026, https://cdn.misoenergy.org/20260506%20Summer%20Readiness%20Workshop%20Presentation_UPDATED755608.pdf

scopes, their results should not be directly compared as equivalent measures of system capability.

The 2026 and 2027 seasonal outlooks further support maintaining readiness for both summer and winter stress conditions. The summer 2027 temperature outlook projects generally above-normal temperatures across Texas, while the precipitation outlook forecasts mostly below normal rainfall across West Texas and above normal chances for East Texas, with Equal Chances across central portions of the State. The winter 2026-27 outlook indicates a stronger signal for above normal precipitation across Texas, while temperature conditions remain more mixed, with Equal Chances forecast across most of the state and only a weak tendency toward above normal or near normal temperatures in parts of North and East Texas.

These outlooks are planning inputs rather than event-specific forecasts and should be used to inform preparedness posture, not to predict individual weather events.

5.1 ERCOT Winter Data Analysis

ERCOT's updated winter analysis indicates that the majority of Transmission Service Provider (TSP) facilities and generation resources are capable of maintaining operation in the winter conditions required by the PUCT's Weather Emergency Preparedness rule.[33] Among the facilities and resources that submitted design temperature and wind speed data, 99.8% of TSP facilities and 96.6% of generation resources had calculated wind chill values below the applicable 95th percentile minimum average 72-hour wind chill chart values.

For its winter weather performance analysis, ERCOT evaluated data reported by electric entities against the established 95th percentile minimum average 72-hour wind chill temperature using declarations of weather preparedness submitted to ERCOT by December 1, 2025, for minimum ambient temperatures at which operations have been sustained. This updated reporting-cycle data provides the current basis for evaluating winter performance against the Weather Emergency Preparedness rule thresholds. The results should be interpreted as evidence of documented winter operating capability under the conditions evaluated by ERCOT, while recognizing that actual winter event performance may also be affected by fuel availability, forced outages, equipment derates, unit start performance, and real-time operating conditions.

In its Historical Weather Study,[34] ERCOT developed the 95th percentile minimum average 72-hour wind chill temperatures for the 10 weather zones within the ERCOT Interconnection, as referenced in 16 TAC §25.55(c)((1)(B) and (f)(1)(B). These values represent the weather-zone-specific cold conditions for which each generation resource and Transmission Service Provider facility must implement weather emergency preparation measures that could reasonably be expected to ensure sustained operation.

Using these zone-specific benchmarks, ERCOT compared reported facility performance to the winter threshold by calculating the average minimum experienced ambient

[33] 16 TAC §25.55(c)(1)(B) (for Generation Entities) and §25.55(f)(1)(B) (for Transmission Service Providers)
[34] 2021 ERCOT Historical Weather Study Final Report Version 1.0, 52691_5_1174266.PDF (texas.gov)

temperature at which Transmission Service Provider facilities and generation resources sustained operations, then calculating the share of reported minimums that were at or below the applicable 95th percentile minimum average 72-hour wind chill value. The zone-by-zone results are presented in **Table 17** and **Table 18**.

Table 17. Winter Data for TSP Facilities

Weather Zone	95th Percentile Minimum Average 72-hour Wind Chill (°F)	Facilities Count	Average Minimum Experienced Ambient Temp (°F) at which Operation Sustained	% of Min Exp Temps < 95th Percentile Wind Chill
Coast	18.1	426	11.9	95%
East	4.4	252	-1.3	81%
Far West	1.3	457	0.0	63%
North	-5.0	260	-10.8	70%
North Central	-0.5	1148	-5.3	61%
Panhandle	-17.6	52	-6.1	4%
South Central	8.4	561	6.3	67%
Southern	16.3	295	-1.3	100%
Valley	20	144	1.9	88%
West	0.3	308	-3.3	73%
		3903		**71.8%**

Table 18. Winter Data for Generation Resources

Weather Zone	95th Percentile Minimum Average 72-hour Wind Chill (°F)	Facilities Count	Average Minimum Experienced Ambient Temp (°F) at which Operation Sustained	% of Min Exp Temps < 95th Percentile Wind Chill
Coast	18.1	258	16.0	70%
East	4.4	37	6.1	43%
Far West	1.3	166	6.2	24%
North	-5.0	81	1.6	7%
North Central	-0.5	151	6.6	19%
Panhandle	-17.6	45	-4.2	9%
South Central	8.4	87	10.8	32%
Southern	16.3	85	20.2	19%
Valley	20	61	22.9	13%
West	0.3	124	3.0	26%
		1095		**32.8%**

The average minimum experienced ambient temperature values shown in these tables are dry-bulb temperatures and do not account for simultaneous wind conditions. As a

result, the initial winter percentages shown in the tables should be interpreted as a conservative representation of sustained operation under cold ambient-temperature conditions before incorporating wind chill effects. When wind effects are considered, the percentage of facilities and resources with calculated wind chill values below the applicable 95th percentile minimum average 72-hour wind chill benchmark increases substantially, further supporting the conclusion stated at the beginning of this section.

5.2 ERCOT Summer Data Analysis

ERCOT's updated summer analysis indicates that the majority of TSP facilities and generation resources are capable of operating under the summer conditions required by the PUCT's Weather Emergency Preparedness rule. Based on updated ERCOT data, 100% of TSP facilities and 99.7% of generation resources had maximum experienced ambient temperatures at or above the applicable 95th percentile maximum average 72-hour temperature benchmark.

In its Historical Weather Study,[35] ERCOT developed the 95th percentile maximum average 72-hour temperatures for the 10 weather zones within the ERCOT Interconnection, as referenced in 16 TAC §25.55(c)(2)(B) and (f)(2)(B). These values represent the weather-zone-specific hot conditions for which each generation resource and TSP facility must implement weather emergency preparation measures that could reasonably be expected to ensure sustained operation.

In order to require summer weather preparation measures resulting in a higher level of system-wide protection, the PUCT deliberately introduced an "or" statement into the rule. The rule requires the implementation of summer weather emergency preparation measures that could reasonably be expected to ensure sustained operation of generation resources and TSP transmission facilities at **the greater of**: (1) the maximum temperature at which the resource or facility has experienced sustained operations, **or** (2) the applicable 95th percentile maximum average 72-hour temperature for the weather zone. Because 72-hour average temperatures include both daytime and nighttime hours, the high temperature values themselves generally do not present a significant compliance challenge relative to observed operating temperatures. Rather, the "greater of" provision establishes the more meaningful standard, effectively requiring facilities to be prepared to sustain operations at the highest temperatures that they have historically experienced and sustained operation.

For its summer weather performance analysis, ERCOT evaluated data reported by electric entities against the established 95th percentile maximum average 72-hour temperature using declarations of weather preparedness submitted to ERCOT by June 1, 2025, for maximum temperatures. This updated reporting-cycle data provides the current basis for evaluating summer performance against the Weather Emergency Preparedness rule thresholds. The results should be interpreted as evidence of documented summer operating capability under the conditions evaluated by ERCOT, while recognizing that actual summer event performance may also be affected by

[35] 2021 ERCOT Historical Weather Study Final Report Version 1.0, 52691_5_1174266.PDF (texas.gov)

demand levels, forced outages, equipment derates, transmission constraints, resource availability, and real-time operating conditions.

Using these zone-specific benchmarks, ERCOT calculated the average maximum experienced ambient temperature for each weather zone based on reported facility data. The maximum experienced ambient temperature represents the highest ambient outside temperature recorded at each TSP facility or generation resource at which sustained operation was achieved. ERCOT then calculated the percentage of maximum experienced temperatures that were greater than the applicable 95th percentile maximum average 72-hour temperature for each weather zone, with the zone-by-zone results presented in **Table 19** and **Table 20**.

Facility counts vary between the winter and summer tables because the number of facilities in each weather zone can change from season to season. The updated summer data include 4,149 Transmission Service Provider facility records and 1,187 generation resource records. ERCOT's analysis indicates that 100% of TSP facilities and 99.7% of generation resources sustained operation at or above the applicable 95th percentile maximum average 72-hour temperature benchmark. The slightly lower percentage for generation resources is attributable to new generation resources in ERCOT that had not yet operated through a full summer season.

Table 19. Summer Data for TSP Facilities

Weather Zone	95th Percentile 72-hour Maximum Average Temp (°F)	Facilities Count	Average Max Experienced Ambient Temp (°F)	% Max Exp Temp > 95th Percentile 72-hour Average Max Temp
Coast	90.1	448	107.9	100%
East	91.6	253	108.7	100%
Far West	92.7	518	112.2	100%
North	96.1	282	113.2	100%
North Central	95.4	1160	110.3	100%
Panhandle	90.3	60	111.9	100%
South Central	92.3	564	108.7	100%
Southern	88.9	328	114.3	100%
Valley	88.6	145	111.7	100%
West	92.9	391	112.7	100%
		4149		**100%**

Table 20. Summer Data for Generation Resources

Weather Zone	95th Percentile 72-hour Average High Temp (°F)	Facilities Count	Average Max Experienced Ambient Temp (°F)	% Max Exp Temp > 95th Percentile 72-hour Average High Temp
Coast	90.1	284	105.3	100%

Weather Zone	95th Percentile 72-hour Average High Temp (°F)	Facilities Count	Average Max Experienced Ambient Temp (°F)	% Max Exp Temp > 95th Percentile 72-hour Average High Temp
East	91.6	37	109.3	100%
Far West	92.7	185	109.0	100%
North	96.1	83	110.9	100%
North Central	95.4	174	110.3	98%
Panhandle	90.3	56	107.3	100%
South Central	92.3	90	108.9	100%
Southern	88.9	88	105.9	100%
Valley	88.6	63	106.8	100%
West	92.9	127	109.8	100%
		1187		**99.7%**

Taken together, ERCOT's analysis suggests that the majority of TSP facilities and generation resources are capable of operating under the summer conditions required by the PUCT's Weather Emergency Preparedness rule.[36] This conclusion should be considered in the context of the rule's summer preparation standard, which requires facilities to sustain operations at the greater of their historically demonstrated operating temperatures or the applicable 95th percentile maximum average 72-hour temperature for the weather zone. Because most facilities have historically operated at temperatures that meet or exceed the applicable 95th percentile thresholds, the observed capability is driven primarily by demonstrated operating experience. Accordingly, the analysis indicates that most existing facilities have sustained operations under temperatures consistent with or above the rule's summer preparedness requirements, while recognizing that some newer generation resources may have more limited operating histories.

5.3 ERCOT Preliminary Winter 2026-2027 Weather Outlook

The ERCOT seasonal outlook and supporting materials provide directional insight into expected weather conditions and potential system exposure.

ERCOT's preliminary winter outlook indicates a near normal seasonal temperature pattern across most of Texas, paired with a wetter precipitation signal across much of the state. The upcoming winter is likely to be both colder and wetter than a year ago. As ERCOT notes, this type of seasonal outlook is expressed as a three-month average and is best read as an overall directional signal rather than a predictor of specific storm timing or local impacts.

ERCOT also notes that El Niño conditions are expected to be a key influence on winter patterns, with analog years showing strong support for a wet winter. Consistent with that

[36] 16 TAC §25.55(c)(2)(B) (for Generation Entities) and §25.55(f)(2)(B) (for Transmission Service Providers)

signal, ERCOT highlights that the precipitation outlook supports decreasing drought conditions. Periods of extreme cold have become more common in recent winters, and another period of extreme cold cannot be ruled out for the upcoming winter. As ERCOT emphasizes, long-range seasonal outlooks do not reliably capture single-event extremes and winter readiness should retain a posture that anticipates at least one cold outbreak.

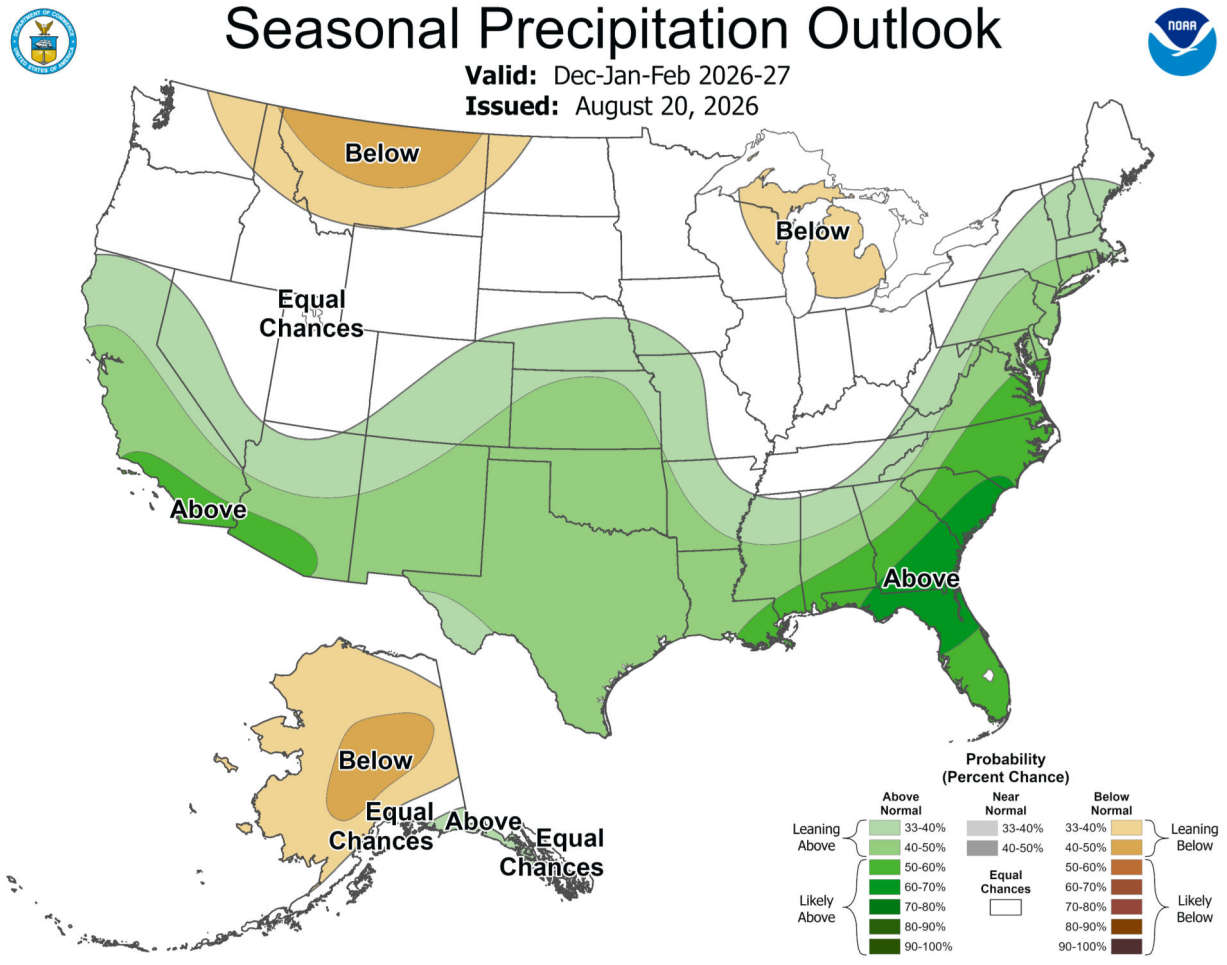
ERCOT notes that its winter forecast will be finalized later in the year, following publication of the final seasonal outlook.

5.4 NOAA Winter 2026-2027 Weather Outlook

NOAA's Winter 2026-2027 outlook supports a preparedness posture that accounts for a wetter seasonal backdrop across Texas while avoiding assumptions about a single temperature outcome. The precipitation outlook leans above normal throughout the state, while the temperature outlook is mostly Equal Chances, with areas of above normal and near normal across portions of North and East Texas. Equal chances suggest winter preparedness should remain flexible for conditions that may vary by event and region, though that can be applied to all of Texas.

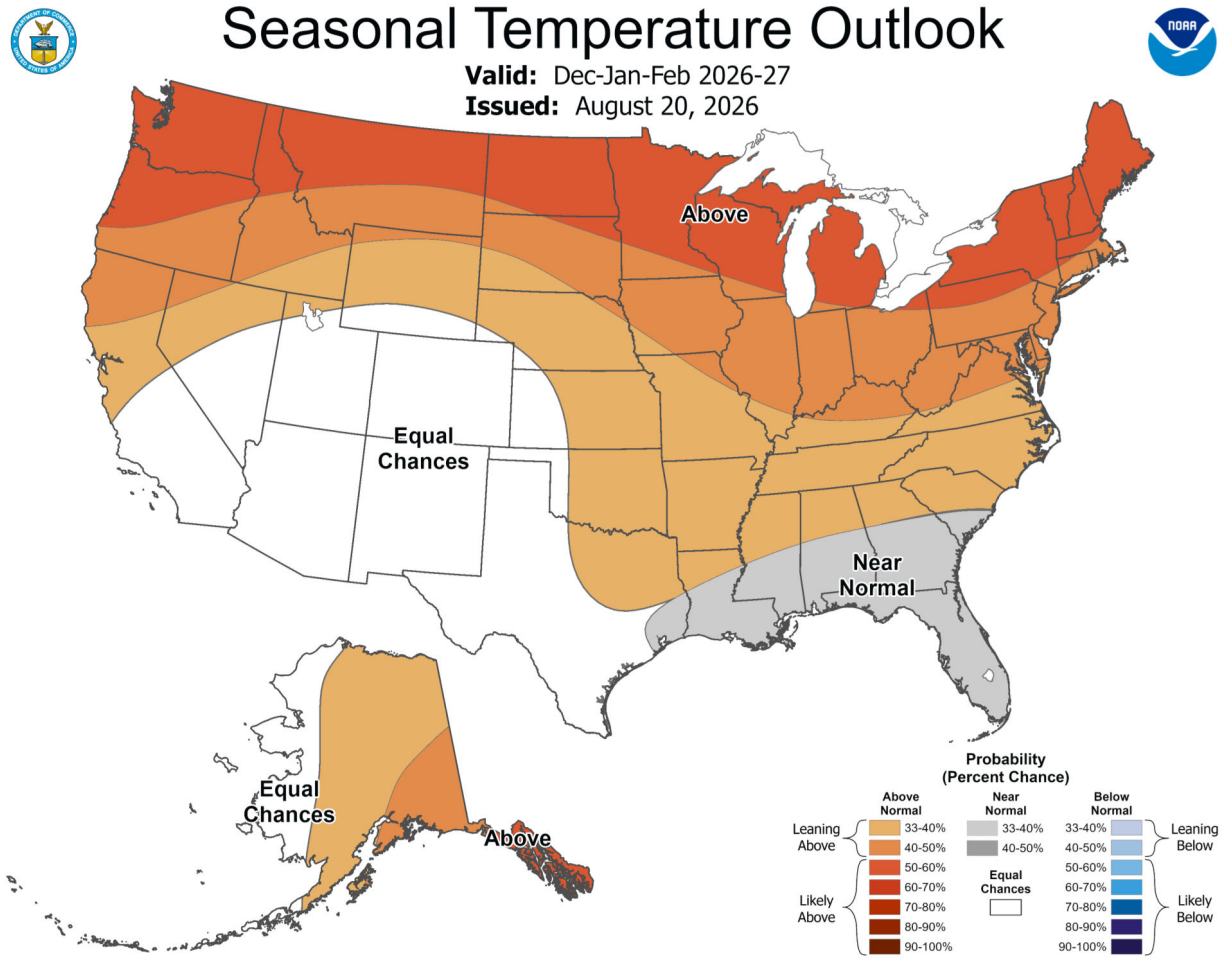
The National Oceanic and Atmospheric Administration's (NOAA) Climate Prediction Center seasonal outlook is best read as a planning input, not a forecast of specific storms. It describes how the season is likely to trend relative to long term normals using probability categories, which is useful for setting expectations and framing preparedness assumptions. It does not predict event timing, local impacts, or whether any single storm will occur.

Figure 4- NOAA Winter 2026-2027 Precipitation Outlook



For Winter 2026-2027, precipitation expectations lean above normal across all of Texas, which is supported by what is expected to be a very strong El Niño (potentially the strongest on record). The most practical way to interpret that signal is to treat it as a planning assumption for readiness activities, not as a prediction of how precipitation will show up across individual events.

Figure 5- NOAA Winter 2026-2027 Temperature Outlook



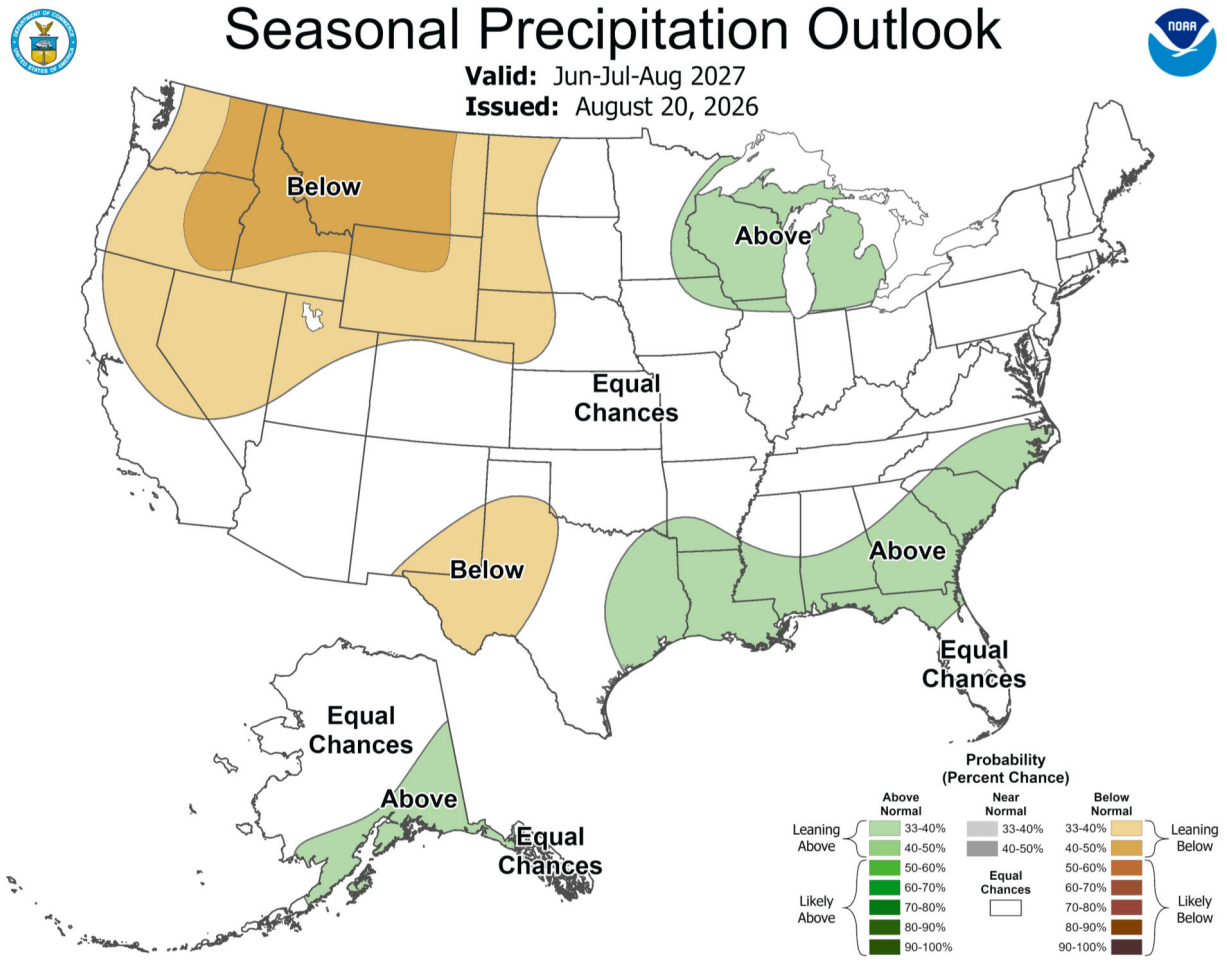
For temperature, the winter outlook is categorized as Equal Chances for most of Texas, meaning the seasonal outlook does not tilt toward above normal or below normal temperatures relative to climatology. Portions of North and East Texas are forecasted to experience above normal and near normal temperatures this winter, with the above normal on the low end of probability. These should not be treated significantly different from the larger region of Equal Chances. From a planning standpoint, the takeaway is to avoid building readiness around a single temperature expectation and instead assume winter conditions could reasonably swing on either side of normal depending on how individual systems evolve.

Taken together, the winter outlook supports planning around a wetter seasonal backdrop across much of Texas without assuming a single statewide temperature outcome. The temperature outlook suggests winter readiness should continue to account for the possibility of conditions on either side of normal, including event-specific cold weather risks that may not be reflected in seasonal averages.

5.5 NOAA Summer 2027 Weather Outlook

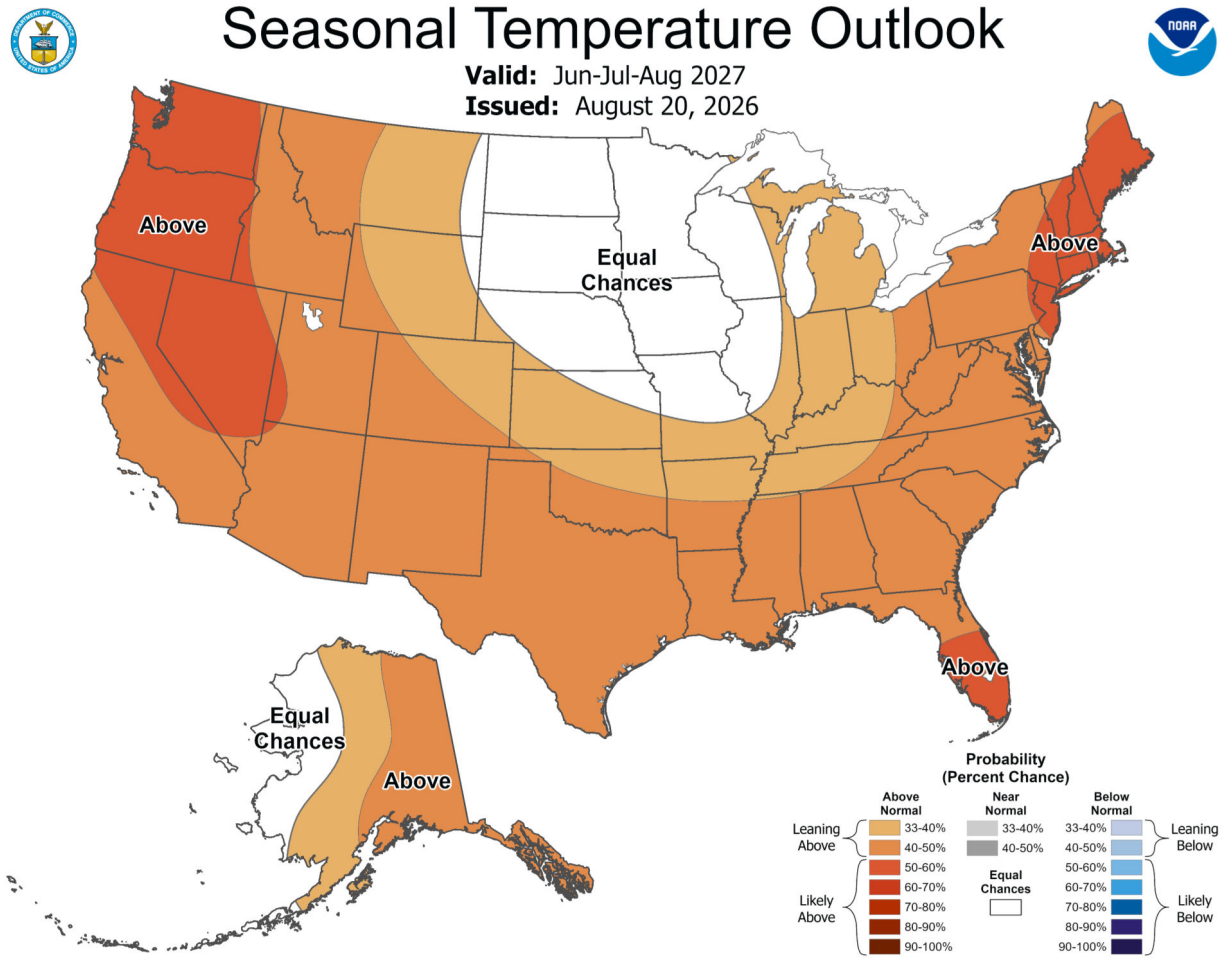
NOAA's Climate Prediction Center seasonal outlook is best read as a planning input, not a forecast of specific storms. It describes how the season is likely to trend relative to long term normals using probability categories, which is useful for setting expectations and framing preparedness assumptions. It does not predict event timing, local impacts, or whether any single storm will occur.

Figure 6- NOAA Summer 2027 Precipitation Outlook



For precipitation, the Summer 2027 outlook forecasts mostly below normal rainfall across West Texas and above normal chances for East Texas, with Equal Chances in-between. The signal should not be interpreted as a prediction of rainfall timing, distribution, or localized impacts. Electric entities should continue to rely on defined operational triggers, real-time monitoring, and event-specific forecasts to support readiness for localized storms, heavy precipitation, or flooding conditions.

Figure 7- NOAA Summer 2027 Temperature Outlook



For temperature, the Summer 2027 outlook places Texas generally in the above normal category, with moderate chances of occurrence. This is supported by a recent trend, with the past four summers all above normal as well as 12 of the past 15 summers. From a planning standpoint, entities should continue to prepare for potential high-demand heat periods.

Most significant is the above normal temperature outlook next summer, with a relatively high chance for high-demand heat periods. The mix of above, below, and Equal Chances for precipitation suggests flexible preparedness for Texas, with a range of summer operating conditions expected with regional variability across the state. Summer impacts remain event-driven and should be interpreted through real-time weather information, system conditions, and operational triggers rather than seasonal probabilities alone.

5.6 Non-ERCOT Power Regions Analysis

Overview

Within the state of Texas there are multiple power regions and Reliability Coordinators (RCs), each responsible for ensuring the reliable operation of electric facilities within their respective territories. ERCOT is the most prominent RC in Texas, covering approximately 75 percent of the state's land mass and 90 percent of the electric load. Outside of the ERCOT power region, MISO serves as the RC for portions of east Texas, while SPP is responsible for portions of north, northeast, and west Texas, including areas operating under SPP West (SPPW)- both responsible for covering the remaining 25 percent of state's land mass. Each of these RCs, shown below in **Figure 8-** Reliability Coordinator Areas, as of July 2022, conducts its own seasonal weather preparedness assessments and analyses to evaluate system readiness. Unlike ERCOT entities, electric entities in the MISO and SPP areas of Texas are not subject to the same 16 TAC §25.55 reporting framework used for the ERCOT seasonal analysis. As a result, this section relies on available regional materials from SPP and MISO to provide preparedness context for non-ERCOT areas, rather than a directly comparable Texas-specific assessment.

Figure 8- Reliability Coordinator Areas, as of July 2022[37]



For the non-ERCOT portions of Texas, available SPP and MISO materials indicate that seasonal preparedness is supported by regional planning, deliverability analysis, and operational-readiness processes, but the available information does not provide the same Texas-specific sustained-temperature analysis available for ERCOT. SPP's winter and summer deliverability studies show that most registered generation capacity in the SPP Balancing Authority footprint was deliverable under modeled seasonal conditions. MISO's winter readiness materials indicate sufficient projected resources under

[37] NERC Reliability Coordinators, July 2022, https://www.nerc.com/pa/rrm/bpsa/Pages/RCs.aspx .

baseline winter conditions, while emphasizing that operational risk remains dynamic due to weather variability, load uncertainty, and resource performance.

These findings should be interpreted as regional indicators of preparedness context rather than Texas-specific determinations of resource adequacy, grid reliability, or actual performance during an extreme weather event. SPP's analysis provides a transmission deliverability view of registered generation across the broader SPP footprint, while MISO's materials provide an operational-readiness view focused on forecasting, reserves, resource performance, and real-time system flexibility. Because these analyses are developed at broader regional footprints and use different methodologies, they should not be compared directly to ERCOT's declarations-based temperature-threshold analysis.

Applicable registered entities that meet the criteria for NERC registration are also subject to federal reliability standards, including NERC Reliability Standard EOP-011-4 and EOP-012-2, effective October 1, 2024.[38] [39] These standards establish a broader reliability and emergency preparedness baseline for registered entities, including requirements related to emergency operations planning and extreme cold weather preparedness. This federal framework provides additional context for non-ERCOT preparedness, but it does not change the limitations of the available state-level analysis described above.

Winter 2025 Analysis

Southwest Power Pool (SPP)

SPP published its 2025 Deliverability Study Winter Season Report on June 1, 2025,[40] which provides a transmission deliverability view of registered generation into the SPP Balancing Authority footprint, rather than a resource adequacy or "planning margins" determination.

Based on SPP's 2025 Winter Season Deliverability Study, Guidehouse concludes that SPP's modeled results indicate a generally strong level of deliverable registered generation capacity across the SPP Balancing Authority footprint, with 96,942 MW of 104,480 MW of registered maximum capacity identified as deliverable, or 92.8%. This supports a finding that, under the study's approved assumptions, most registered generation capacity was deliverable for winter-season conditions. However, this should be interpreted as a transmission deliverability finding, not as a determination of resource adequacy, real-time reliability, or actual system performance during an extreme weather event.

Using the study's approved assumptions, SPP reported total winter-season deliverable capacity of 96,942 MW, representing 92.8% deliverability of 104,480 MW of registered maximum capacity as of March 1, 2025. Results were provided by fuel type, with reported deliverability percentages including coal 92.2%, natural gas 94.3%, wind

[38] NERC, "Reliability Standard EOP-011-4", October 2024, Final Ballot_Phase 2_EOP-011-4 (nerc.com).
[39] NERC, "Reliability Standard EOP-012-2", October 2024, Final Ballot_EOP-012-1_clean (nerc.com).
[40] SPP, "2025 Deliverability Study Winter Season Report", May 2026, https://www.spp.org/documents/74232/2025%20deliverability%20study%20winter%20season%20report.pdf

93.5%, solar 86.7%, energy storage 86.0%, and hydro 70.5% (among other smaller categories).

Table 21. SPP 2025 Winter Season Results by Fuel Type[41]

Fuel Type	Deliverable Capacity (MW)	Max Capacity (MW)	Percent Deliverable (Deliverable Capacity / Max Capacity)
Coal	20,337.9	22,058.6	92.2%
Energy Storage	283.9	330.0	86.0%
Fuel Oil	1,490.2	1,581.0	94.3%
Municipal Solid Waste	16.0	16.0	100.0%
Natural Gas	35,327.8	37,482.9	94.3%
Nuclear	2,061.0	2,061.0	100.0%
Other Fuel	52.4	54.2	96.6%
Solar	984.9	1,135.5	86.7%
Hydro	2,416.4	3,427.6	70.5%
Wind	33,971.5	36,333.6	93.5%
Total	**96,942.0**	**104,480.4**	**92.8%**

SPP also reported that installed capacity in the study increased by 3,182 MW versus the prior winter deliverability study and provided a three-year trend showing deliverability moving from 94.1% (2023) to 89.6% (2024) to 92.8% (2025), indicating that deliverable capacity increased year-over-year alongside installed capacity, but not always at the same rate.

Deliverability Study	Max Capacity (MW)	Deliverable Capacity (MW)	Percent Deliverable (Deliverable Capacity / Max Capacity)
2023	98,990	93,158	94.1%
2024	101,298	90,713	89.6%
2025	104,480	96,924	92.8%

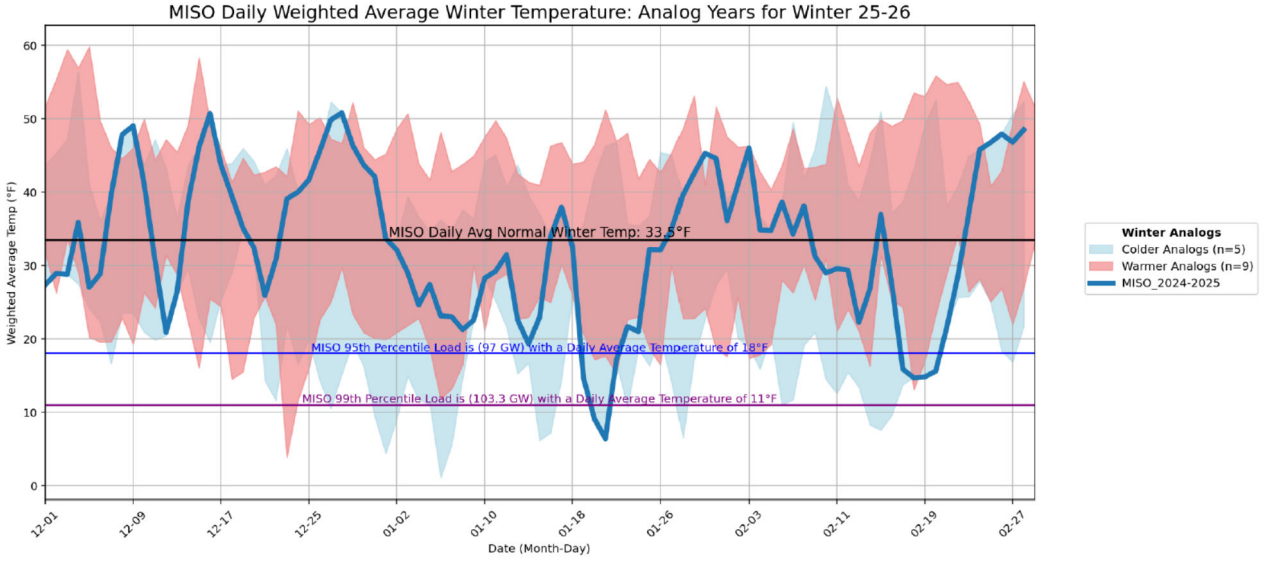
Midcontinent Independent System Operator (MISO)

MISO's Winter Readiness Workshop presentation for the 2025-2026 season outlines a system that is expected to have sufficient resources to meet projected winter demand, but with an increasing emphasis on operational risk and uncertainty driven by weather variability, resource performance, and load growth.[42] The winter outlook presented by MISO reflects a near-normal seasonal expectation overall, with below-normal conditions

[41] SPP, "2025 Deliverability Study Winter Season Report", May 2026, https://www.spp.org/documents/74232/2025%20deliverability%20study%20winter%20season%20report.pdf
[42] MISO, "Winter 2025-26 Winter Readiness Workshop", May 2026, https://cdn.misoenergy.org/20251029%20Winter%20Readiness%20Workshop%20Presentation723831.pdf.

more likely across northern and central portions of the footprint and above-normal conditions in the south, paired with elevated precipitation in northern regions and a generally more variable temperature pattern. MISO projects peak demand in the range of approximately 103 GW with potential to reach near 109 GW under more extreme conditions, indicating that while baseline supply is expected to be adequate, system stress scenarios remain plausible. The presentation further highlights several operational sensitivities, including the potential for significant renewable output reductions during extreme cold events, where wind generation losses could be substantial at very low temperatures, as well as known forecasting challenges associated with icing and precipitation impacts.

Figure 9- MISO Daily Average Temperatures: Analog Years



MISO's seasonal readiness materials are developed at a regional footprint level and are not specific to Texas-only conditions. For the purposes of this report, these materials are presented as contextual background to provide insight into broader system readiness considerations within non-ERCOT regions. Unlike ERCOT, Texas-specific, declaration-based weather preparedness data is not available for electric entities operating within MISO or SPP areas of Texas. As a result, MISO information is used to inform general system conditions and operational considerations rather than to draw Texas-specific conclusions regarding resource adequacy, system performance, or preparedness outcomes.

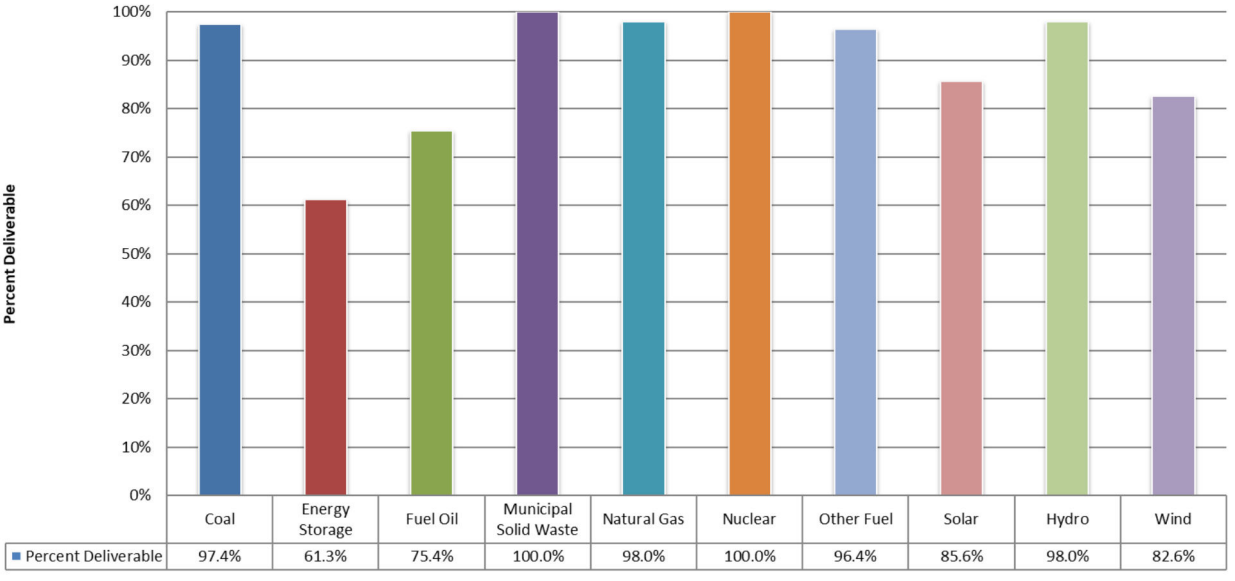
MISO's winter readiness materials provide a complementary non-ERCOT perspective focused on operational readiness rather than a sustained-temperature or deliverability metric. For this report, the key takeaway is that MISO expects sufficient resources under baseline winter conditions, but continues to emphasize forecasting, reserve management, coordination, and resource performance because reliability risk can change quickly during stressed winter conditions.

Summer 2026 Analysis

Southwest Power Pool (SPP)

SPP published its 2026 Deliverability Study Summer Season Report on December 16, 2025, which provides a transmission deliverability view of registered generation into the SPP Balancing Authority (BA) footprint, rather than a resource adequacy or "planning margins" determination.[43] Using the study's approved assumptions, SPP reported total summer-season deliverable capacity of 97,163 MW, representing 91.9% deliverability of 105,714 MW of registered maximum capacity as of September 1, 2025. Results were provided by fuel type, with reported deliverability percentages including coal 97.4%, natural gas 98.0%, wind 82.6%, solar 85.6%, energy storage 61.3%, and hydro 98.0% (among other smaller categories).

Figure 10- SPP 2026 Summer Deliverability by Fuel Type[44]



	Coal	Energy Storage	Fuel Oil	Municipal Solid Waste	Natural Gas	Nuclear	Other Fuel	Solar	Hydro	Wind
Percent Deliverable	97.4%	61.3%	75.4%	100.0%	98.0%	100.0%	96.4%	85.6%	98.0%	82.6%

SPP's Summer 2026 study offers a quantified indicator of how much registered capacity is deliverable to the broader SPP BA Area under modeled summer conditions, which helps frame non-ERCOT seasonal context where ERCOT-style declarations and benchmarking are not available. Deliverable Capacity purchases are explicitly described as a mechanism that allows a Load Responsible Entity to satisfy the Planning Reserve Margin portion of its resource adequacy requirement without obtaining firm transmission service, and the study's applicability section emphasizes that results reflect "available but not committed" capacity and are used to support capacity contracting arrangements. SPP also reported that installed capacity increased by 2,494 MW versus the prior summer deliverability study and provided a multi-year trend indicating deliverability has remained in the low-90% range in recent study years, reinforcing that deliverable

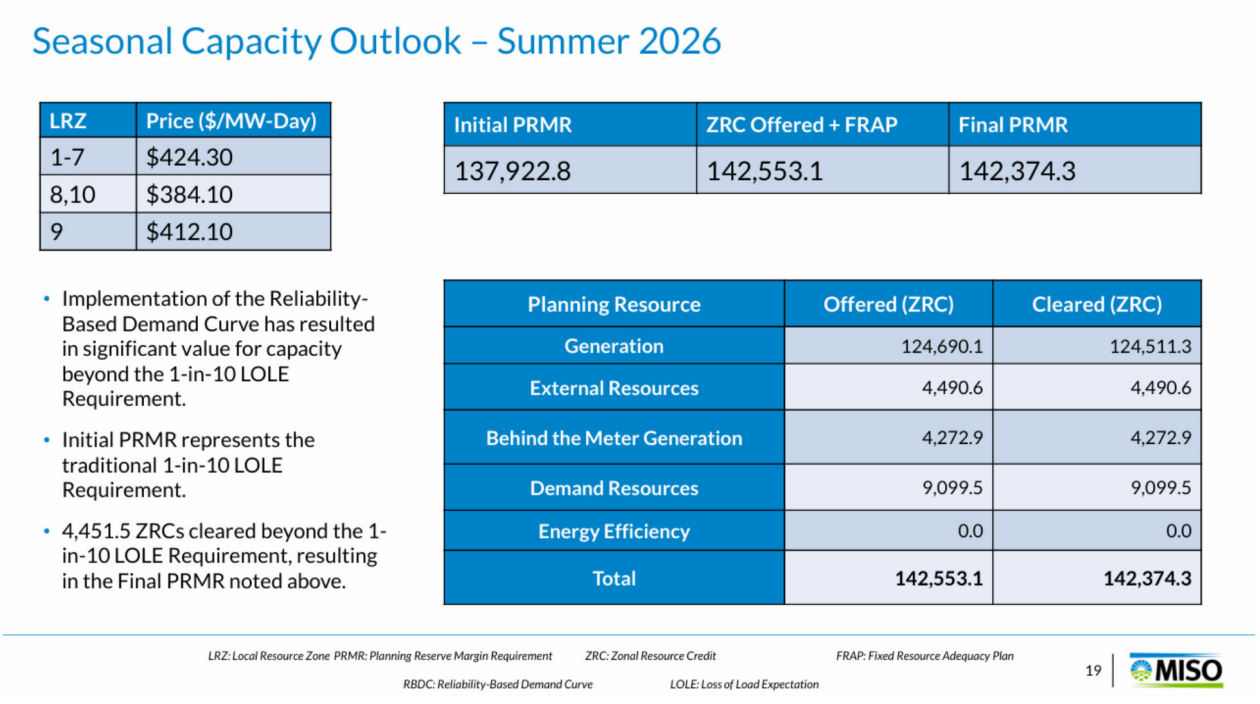
[43] SPP, "2026 Deliverability Study Summer Season Report", May 2026, https://www.spp.org/documents/75526/2026%20deliverability%20study%20summer%20season%20report.pdf .
[44] SPP, "2026 Deliverability Study Summer Season Report", May 2026, https://www.spp.org/documents/75526/2026%20deliverability%20study%20summer%20season%20report.pdf .

capacity has increased alongside installed capacity but not always proportionally across resource types.

Midcontinent Independent System Operator (MISO)

MISO's Summer 2026 Readiness Workshop[45] provides additional seasonal context for non-ERCOT regions by emphasizing operational readiness, resource availability, transmission planning, and uncertainty management rather than a Texas-specific sustained-temperature benchmark. For summer 2026, MISO materials indicate that above-normal temperatures were expected in MISO's South Region, while near-normal temperatures were expected across the North/Central Region, with normal precipitation across much of the MISO footprint. MISO also identified several operational considerations for summer readiness, including drought monitoring, variable renewable output, net scheduled interchange risk, fuel availability, solar growth, and changing net load ramps.

Figure 11- MISO Summer 2026 Seasonal Capacity Outlook[46]



Seasonal Capacity Outlook – Summer 2026

LRZ	Price ($/MW-Day)
1-7	$424.30
8,10	$384.10
9	$412.10

Initial PRMR	ZRC Offered + FRAP	Final PRMR
137,922.8	142,553.1	142,374.3

- Implementation of the Reliability-Based Demand Curve has resulted in significant value for capacity beyond the 1-in-10 LOLE Requirement.
- Initial PRMR represents the traditional 1-in-10 LOLE Requirement.
- 4,451.5 ZRCs cleared beyond the 1-in-10 LOLE Requirement, resulting in the Final PRMR noted above.

Planning Resource	Offered (ZRC)	Cleared (ZRC)
Generation	124,690.1	124,511.3
External Resources	4,490.6	4,490.6
Behind the Meter Generation	4,272.9	4,272.9
Demand Resources	9,099.5	9,099.5
Energy Efficiency	0.0	0.0
Total	**142,553.1**	**142,374.3**

LRZ: Local Resource Zone PRMR: Planning Reserve Margin Requirement ZRC: Zonal Resource Credit FRAP: Fixed Resource Adequacy Plan
RBDC: Reliability-Based Demand Curve LOLE: Loss of Load Expectation

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The Seasonal Capacity Outlook supports the broader conclusion that MISO entered summer planning with sufficient resource availability on a footprint-wide basis, but continued to treat summer readiness as an operational risk-management issue rather than a static capacity finding. While cleared planning resources exceeded the initial Planning Reserve Margin Requirement, the workshop materials also emphasize that actual summer reliability depends on how MISO manages weather-driven load,

[45] MISO, "Seasonal Readiness Workshop: Summer 2026", May 2026, https://cdn.misoenergy.org/20260506%20Summer%20Readiness%20Workshop%20Presentation_UPDATED755608.pdf .
[46] MISO, "Seasonal Readiness Workshop: Summer 2026", May 2026, https://cdn.misoenergy.org/20260506%20Summer%20Readiness%20Workshop%20Presentation_UPDATED755608.pdf .

renewable variability, fuel availability, interchange conditions, and net load ramping during real-time operations

From a planning perspective, the workshop materials indicate that MISO evaluated generation availability, transmission system conditions, and seasonal risk management actions ahead of the summer operating period. MISO reported that its steady-state AC contingency analysis did not identify contingencies without operating plans for the summer season, while also emphasizing the need to manage uncertainty through forecasting, reserve requirements, commitment thresholds, and emergency operating procedures. For purposes of this report, MISO's summer materials should be interpreted as operational-readiness context for the broader MISO footprint rather than a Texas-specific determination of resource adequacy, transmission deliverability, or actual performance during an extreme summer event.

6. Conclusion

Based on Guidehouse's review of EOPs submitted pursuant to 16 TAC §25.53, the Texas electric grid has a documented foundation to withstand and respond to extreme weather events. The submitted EOPs show that many electric entities, both within and outside the ERCOT power region, have established emergency preparedness programs, weather-specific planning measures, staffing and training protocols, situational awareness processes, communication procedures, and response measures for a range of adverse weather conditions. These findings support the conclusion that, based on the documentation available for review, Texas electric entities have broadly established the planning elements needed to support grid reliability during extreme weather events.

This conclusion is informed by both the compliance reviews conducted for 926 applicable entities and the maturity indicator analysis conducted on a sample of 50 entities. From a compliance perspective, the 926 entities out of 1,131, 82% of applicable electric entities, submitted either a complete EOP or an affidavit-only filing in 2026. The 2025 amendments to 16 TAC §25.53 required entities to submit full EOPs as part of the comprehensive three-year refiling cycle. 838 entities, or 74% of applicable electric entities, submitted complete 2026 EOPs for review.

This assessment should be interpreted as a review of documented preparedness rather than an independent verification of operational execution or real-world emergency performance. The submitted EOPs provide evidence of planning efforts and required preparedness measures, but document review alone cannot confirm whether those measures are fully operationalized, maintained, or effective during an actual emergency event. Accordingly, while the available documentation supports the conclusion that the grid has documented preparedness to withstand extreme weather, continued Commission oversight, ongoing monitoring, and complementary compliance and preparedness activities remain important to validate and strengthen operational readiness over time.

This conclusion should also be considered within the broader context of the PUCT's ongoing resiliency and preparedness initiatives. Requirements under 16 TAC §25.53, weather preparedness obligations under 16 TAC §25.55, and system hardening initiatives collectively contribute to strengthening the resilience of the Texas electric grid. The scope of this evaluation was limited to preparedness measures documented within the weather-related annexes and EOP materials required under 16 TAC §25.53.

Key Changes Since the 2024 Report

In 2025, the PUCT adopted amendments to 16 TAC §25.53 (Project No. 57928) that refine EOP filing expectations and supporting documentation requirements. As described in the adopted rulemaking record, these amendments include use of an executive summary template, expanded asset listing expectations in executive summaries, clarified annex filing expectations (including flood annexes for applicable facilities), requirements to file annexes in their entirety, periodic comprehensive refiling

requirements, and clarifications on how an EOP should be made available to Commission staff. These updates are intended to improve consistency and reviewability of submissions; the 2026 review cycle evaluated how these updated requirements affected filing completeness and comparability as results were validated.

Observed Benefits to Date from the 2025 Amendments

The 2026 reviews indicate that the 2025 updates are improving baseline consistency and traceability across filings.

In particular, 86% of the reviewed submissions include the Commission's executive summary template and the associated "EOP Filing Requirement Mapping," which provides clear page-level references to required elements and enables faster confirmation that core requirements are present, such as mapped references to the executive summary content, record of distribution, emergency contacts, and affidavit/attestation materials. Where entities have completed the template, reviewers can confirm key filing components directly from the mapping and associated attachments, including record-of-distribution tables and emergency contact lists, rather than relying on manual search across lengthy plan documents. At the same time, some samples also show that benefits are not yet uniform across all filings. For example, 76% of reviewed submissions included a formal record of distribution, indicating that 24% did not provide documentation in the expected format, thereby limiting the ability to readily verify compliance. These results suggest a continued opportunity for greater standardization of documentation practices and clearer demonstration of compliance as implementation of the requirements matures.

The 2026 review also highlights the value of incorporating lessons learned from prior assessment cycles. Some recommendations included in Guidehouse's 2024 report were adopted by PUCT, most notably the introduction of executive summary requirements and the addition of a dedicated flood annex. The executive summary requirement contributed to more consistent EOP organization and presentation, improving the usability of submissions and streamlining the review process. Similarly, the flood annex requirement enhanced the visibility of flood-related preparedness measures and provided a more structured basis for evaluating flood response planning.

Building on these improvements, Guidehouse's 2026 recommendations, presented in the next section (**Section 7 Recommendations**), focus on further strengthening consistency, efficiency, and preparedness planning. Recommended enhancements include the standardized use of entity ID numbers to improve submission tracking and reporting, continued clarification that joint-filing entities may submit a single common EOP package to reduce administrative burden for both entities and reviewers, and consideration of more detailed guidance for annexes.

7. Recommendations

Guidehouse provided recommendations to the PUCT informed by the overarching analysis, with insights from EOP reviews, emergency weather preparedness assessments, and industry best practices. These recommendations are focused on promoting long-term reliability and resiliency of the Texas electric grid, streamlining, and improving the EOP submission process for entities, and improving monitoring and compliance methods for the PUCT. The recommendations are solely based on information submitted by the applicable electric entities, and reviewed by Guidehouse, as part of the weather emergency preparedness portion of the EOP submissions required by 16 TAC §25.53.

7.1 Summary of 2024 Recommendations

As part of the 2025 amendments to 16 TAC §25.53, the PUCT adopted three recommendations that were identified in Guidehouse's 2024 Weather Emergency Preparedness Report. Specifically, the amended rule established a standardized executive summary template to promote consistency and improve the clarity of EOP submissions across entities, expanded EOP requirements to include a dedicated flood annex, and enhanced filing requirements by reducing reliance on affidavits attesting that no material changes had been made to an entity's EOP. This latter change addressed a key concern identified during the 2024 review, where many entities had submitted affidavits in lieu of updated EOPs for multiple consecutive years, limiting PUCT's visibility into the completeness of emergency preparedness planning by those entities. The updated filing requirements help ensure that EOPs are periodically resubmitted and reviewed, providing PUCT with more current information regarding entity preparedness and operational changes.

Collectively, these amendments represent meaningful steps toward improving quality, consistency, completeness, and ongoing oversight of emergency preparedness documentation. The 2024 recommendations are summarized in **Table 22**. The text in **green** indicates recommendations that were adopted as a part of the 2025 amendments.

Table 22. 2024 Recommendations and Suggested Actions

2024 Recommendation	Suggested Action	Impact of Adoption in 2026
16 TAC §25.53 Enhancements	• Require individual EOP submissions for each individually registered electric entity. • Develop a template for the **executive summary** for EOPs.	• **Executive Summaries:** 659 entities submitted an Executive Summary in the PUCT-required format (as compared to 21 entities in 2025), significantly improving review efficiency and clarity. The ease of review was facilitated by the presence of

2024 Recommendation	Suggested Action	Impact of Adoption in 2026
	• Consider updating the regulations to include explicit instructions defining the type of content that each section of the EOP should include at a minimum. • Add a requirement to 16 TAC §25.53 for a **Flooding annex** to EOP submissions. • Enhance the existing language of 16 TAC §25.53 requiring all annexes to be submitted with EOPs. • Enhance the existing language of 16 TAC §25.53 to **limit the use of affidavits** for EOPs without material changes.	Entity ID numbers in most EOPs which had executive summaries. • **Flooding Annex:** The inclusion of Flood Annex requirements under 16 TAC §25.53 appears to have positively influenced EOP content. Among entities that submitted EOPs, 84% included a Flood Annex in 2026, compared to 42% in 2024, indicating increased adoption of flood-specific preparedness and response planning. • **Affidavit use:** The three-year refiling requirement helped limit the practice of submitting affidavits in lieu of full EOPs, as entities were specifically required to resubmit complete EOPs. As a result, a 72% submission rate of full EOPs was observed.
Improve Weather Emergency Preparedness Across Texas	• Establish financial penalties for noncompliance with 16 TAC §25.53 requirements. • Establish annual or bi-annual workshops and training sessions for electric entities and entities in the process of registering with the PUCT.	*Not Adopted in 2025 amendments*
Improve Clarity of EOP Submissions	• Establish greater focus on actions to prepare their power delivery functions to withstand extreme weather events and additional measures taken to provide power to critical customers. • Develop uniform emergency operations processes, procedures, and tools across the organization that consistently apply across all the subsidiary power delivery business units and address all types of identified emergency response actions. • The EOP should include fully developed content for its emergency response preparation and response procedures.	*Not Adopted in 2025 amendments*
Enhance Readiness and Reliability Through Ongoing Oversight	• Use findings from the Weather Emergency Preparedness review to inform future oversight and monitoring activities.	*Not Adopted in 2025 amendments*

Additionally, the following considerations, as shown on **Table 23**, were also presented:

Table 23. 2024 Considerations

Consideration Description
Request declarations of weather preparedness for all applicable entities in Texas that are not part of the ERCOT power region.
Coordinate with electric entities to develop and encourage use of a secure electronic filings process for emergency operation plan documents.
Develop a guided submission process in PUCT's Agency Information System (AIS) with specific parameters and backend mapping for filing submissions.
Develop a backend tracking tool for EOP submissions based on filing number (53385) and entity names.
Establish a comprehensive risk framework and database tool to be used throughout the PUCT.

7.2 2026 Additional Recommendations

Compared to the 2024 review cycle, the 2026 filing cycle was characterized by higher submission rates, with approximately 74% of entities included in the master database submitting a full EOP in accordance with the amended three-year complete EOP filing requirements and 82% filing either a complete EOP or an affidavit. While the review results identified evidence of progress in EOP submissions, they also highlighted opportunities to further strengthen weather emergency preparedness planning, improve documentation practices, enhance oversight and monitoring processes, and increase consistency across EOP submissions.

Based on these findings, Guidehouse has developed the following recommendations to build upon and expand the recommendations presented in the 2024 report. These recommendations provide greater specificity regarding EOP content and documentation expectations while also addressing preparedness considerations for emerging and evolving operational risks.

7.2.1 Strengthen the Use of Entity ID Numbers in EOP Filings

Based on the reviews, entity ID numbers were found to play a critical role in the compliance review process by enabling filings to be consistently associated with regulated entities, even when entity names changed or were reported differently across submissions. However, approximately 10% of submitted EOPs could not be readily assigned to a specific entity because an entity ID number was missing, incomplete, or could not be matched. While the Executive Summary template includes fields intended to identify covered entities, Guidehouse observed that entity identification information was not always completed consistently. The inability to reliably associate some submissions with regulated entities and the considerable number of entities with no submission represents the largest observed gap in EOP compliance.

To improve submission tracking and compliance oversight, Guidehouse recommends that PUCT evaluate opportunities to further standardize and automate the EOP filing process. The preferred approach would be the implementation of a submission system that requires a valid entity ID number as a condition of filing and supports ongoing compliance monitoring through a dashboard or similar reporting mechanism. Such a solution would provide greater visibility into filing status, facilitate the timely identification of noncompliant entities, reduce manual reconciliation efforts, and improve the overall accuracy and reliability of compliance data.

Recognizing that system enhancements may require additional time and resources, a phased approach relying on more manual administrative controls could also be implemented. As an initial step, a master inventory of regulated entities, including associated DBA names and entity ID numbers, could be developed and maintained to support more accurate submission tracking and entity matching. This effort will need to be complemented by strengthened filing instructions, clearer communication of entity ID requirements for both individual and joint submissions, intake validation procedures, and periodic reconciliations between submitted filings and entity registration records. While more manually intensive than an automated solution, these measures could serve as a starting point to improve submission traceability, enhance entity-to-filing matching, and provide a stronger foundation for compliance monitoring and future review activities.

7.2.2 Clarify and Reinforce Guidance on Joint EOP Filings

Based on the 2026 compliance reviews for over 1,000 entities, it was noted that multiple entities included in a joint EOP filing also submitted separate individual EOP filings. During the 2026 review, Guidehouse observed several instances of this practice. Although these duplicate filings appear to reflect a good-faith effort by entities to ensure compliance with 16 TAC §25.53, they generate additional review and coordination efforts for both filers and PUCT due to the increased volume of submitted documents.

To reduce duplicative filings and promote a more efficient submission process, PUCT can consider providing additional clarification regarding when a joint filing satisfies the filing requirements for all covered entities and when separate submissions are required. This could be accomplished through updated FAQs, supplemental guidance documents, training workshops, or targeted outreach before annual filing deadlines. Additional clarification would help reduce uncertainty among entities, encourage more consistent filing practices, and improve the overall efficiency of the EOP submission process.

7.2.3 Provide More Prescriptive Guidance on Minimum Annex Content Requirements

Based on findings from the 2026 deep-dive analysis of the level of detail included across EOP annexes, Guidehouse reiterates its 2024 recommendation that the PUCT provide more explicit guidance defining minimum content expectations for each section of an EOP and its associated annexes.

Based on the review of approximately 1,100 EOP submissions in 2026, it was observed that the quality and organization of submitted materials varied significantly across entities. While some lower-scoring EOPs lacked required annexes or omitted important preparedness information, it was also noted that many higher-scoring entities submitted extensive collections of documents, procedures, plans, checklists, and supporting materials to demonstrate compliance with all applicable requirements. Although these submissions often contained the necessary information, the volume and structure of the documentation frequently made it difficult to efficiently identify whether specific rule requirements were fully addressed.

Providing additional guidance on the minimum information expected within each annex and requiring entities to organize content around clearly defined reporting elements would help establish a more consistent baseline for compliance while reducing unnecessary variability in submissions. Such an approach would support both regulated entities and PUCT staff by improving consistency, reducing ambiguity, and facilitating more efficient reviews. The objective would not be to require a uniform EOP format, but rather to establish clear expectations regarding the information that should be included at a minimum to demonstrate preparedness and compliance with 16 TAC §25.53.

Specifically, Guidehouse recommends consideration of the following minimum content expectations:[47]

Cold and Hot Weather Emergency Annex

- Weather monitoring methodologies and activation thresholds.
- Winterization activities, freeze protection measures, and seasonal readiness assessments.
- Identification of heat-sensitive assets, cooling systems, and peak-demand preparedness measures.
- Notification procedures for personnel, customers, and stakeholders.
- Distinct response procedures for extreme cold and extreme heat events.
- Spare equipment strategies, restoration priorities, and recovery activities.

Flood Annex

- Floodplain identification methodologies and mapping of flood-prone assets.
- Flood monitoring procedures and activation thresholds.
- Pre-, during-, and post-flood response actions.

[47] These annex-specific recommendations have been developed based on observations from the 2026 EOP reviews, identified gaps in submitted plans, and SME assessments of practices commonly associated with effective EOPs.

- Coordination with emergency management agencies and flood forecasting resources.
- Asset protection measures, including flood barriers, equipment protection, and continuity strategies.
- Resource requirements, restoration planning, damage assessments, and after-action reviews.

Wildfire Annex

- Wildfire risk assessments and hazard identification methodologies.
- Vegetation management and system hardening measures.
- Monitoring procedures and operational triggers.
- Communication and coordination procedures with stakeholders and emergency responders.
- Response, restoration, and recovery procedures following wildfire impacts.

Hurricane Annex

- Hurricane monitoring procedures and activation thresholds.
- Personnel management, contractor mobilization, and mutual aid coordination.
- Asset protection and resource staging activities.
- Communication procedures for customers and stakeholders.
- Damage assessment, restoration, recovery, and continuity planning.

Water Shortage Annex

- Identification of water-dependent generation assets and associated vulnerabilities.
- Monitoring of water availability, drought indicators, and regulatory restrictions.
- Conservation measures, operational thresholds, and alternate water supply arrangements.
- Coordination with water suppliers and applicable agencies.
- Continuity-of-generation strategies, recovery actions, and corrective action tracking.

Common Elements for All Annexes

Guidehouse further recommends that all annexes include:

- Clearly defined activation criteria and response levels.
- Roles and responsibilities for key personnel.
- Resource requirements and mutual assistance procedures.
- Internal and external communication protocols.
- Coordination with ERCOT, emergency management agencies, and other stakeholders.
- Recovery procedures, after-action reviews, lessons learned, and corrective action tracking.

Establishing these minimum content expectations would improve consistency across EOP submissions while allowing entities the flexibility to tailor plans to their unique operational environments and risks. It would also reduce ambiguity regarding

compliance expectations and facilitate more efficient and consistent reviews by PUCT staff.

7.2.4 Expand Technical Assistance to Improve EOP Filing Quality and Consistency

Based on the variability observed across 2026 EOP submissions, PUCT can consider expanding technical assistance for entities by building on a similar recommendation included in the 2024 report, which suggested biannual workshops and training sessions to provide clarity around 16 TAC §25.53 requirements and expectations. While that recommendation was intended to support entity understanding through periodic outreach and training, the variability observed across 2026 EOP submissions indicates that additional practical implementation support may be beneficial. Providing specific support and guided materials to entities ahead of submission can help them better understand filing expectations, apply requirements more consistently, and reduce avoidable documentation gaps.

As a near-term priority, PUCT could build upon previous recommendations for workshops and training sessions by providing standardized templates, sample annex structures, filing checklists, guidance materials, and walkthroughs of key submission requirements. These resources would help entities better understand filing expectations, document required EOP elements more consistently and reduce avoidable documentation gaps. The intent would not be to create additional compliance obligations, but rather to support entities in applying existing requirements and presenting information in a clear and consistent manner.

As a longer-term consideration, PUCT could evaluate the feasibility of establishing a voluntary pre-submission review and feedback program for entities seeking additional support. Under such a program, participating entities could receive confidential feedback on the completeness, clarity, and organization of draft EOPs before formal submission. However, administering individual plan reviews could require significant Commission resources, given the number of entities subject to EOP requirements. If pursued, a voluntary review program may need to incorporate mechanisms such as participation limits, prioritization criteria, pilot phases, or first-come, first-served enrollment to align demand with available resources.

Accordingly, expanding technical assistance through workshops, templates, guidance materials, and other broad-based support mechanisms may provide the most efficient and scalable near-term approach to improving EOP quality and consistency across the industry. Over time, these efforts could also help identify common areas where more targeted assistance or a limited voluntary review program may provide additional value. By combining proactive outreach with practical implementation tools, PUCT can promote greater consistency in how entities interpret, document, and demonstrate compliance with EOP requirements while balancing resource considerations.

Appendix A: Compliance Framework Checklist

Table A-24. Compliance Framework Checklist

#	16 TAC §25.53	Category	Regulatory Filing Requirement
2	N/A	Asset Management and Inspections	A plan is set up to maintain preidentified supplies for emergency response.
4	(d) (4)	Staffing	A plan for adequate staffing during emergency response.
6	(c) (4) (C) (i); (c) (4) (C) (iii)	Training and Emergency Drills	• Relevant operating personnel have received training on the applicable contacts and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP, recognizing that deviation from the plan may be appropriate as a result of specific circumstances during an emergency. • Drills have been conducted to the extent required by 16 TAC §25.53(f): An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify Commission staff, using the method and form prescribed by Commission staff on the Commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.)
7	(d) (5)	Situational Awareness	• Include a description of how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding.
10	(d) (5)	Activation of EOP	• The process and procedures the entity follows to activate the EOP.
12	(d) (2)	Public Communications	• A communication plan. • The procedures during an emergency the entity uses for handling complaints. • Emergency procedures for communicating with the following prescribed groups: the media; customers; fuel suppliers; the Commission; the OPUC; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; the reliability coordinator for its power region; and critical load customers directly served by the entity.
15 A	(e) (1) (A)	Compliance with Regulations - Cold Weather Emergency Annex (gen, T&D)	• Include a weather annex with operational plans for responding to cold weather emergencies and a checklist for facility personnel to use during cold weather emergency response. This annex must include checklists that reflect lessons learned from past weather

			emergencies to ensure necessary supplies and personnel are available. Entities with generation facilities must also include: • A weather annex that meets all of the requirements above produced by entities with T&D facilities and also includes a verification of the adequacy and operability of fuel switching equipment, if installed. An EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 B	**(e) (1) (A)**	Compliance with Regulations - Hot Weather Emergency Annex (gen, T&D)	• Include a weather annex with operational plans for responding to hot weather emergencies and a checklist for facility personnel to use during hot weather emergency response. This annex must include checklists that reflect lessons learned from past weather emergencies to ensure necessary supplies and personnel are available. Entities with generation facilities must also include: • A weather annex that meets all of the requirements above produced by entities with T&D facilities and also includes a verification of the adequacy and operability of fuel switching equipment, if installed. An EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 C	**(e) (1) (E)**	Compliance with Regulations - Hurricane Annex (gen, T&D, REP)	• Include operational plans for responding to hurricanes and a checklist for facility personnel to use during the emergency response. This annex must include checklists that reflect lessons learned from past emergencies to ensure necessary supplies and personnel are available. The hurricane annex should include evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, and any additional circumstances appropriate to the entity. (This is the only weather-related annex REPs are required to include in their EOPs.) • File an EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 D	**(e) (1) (D)**	Compliance with Regulations - Wildfire Annex (T&D)	• Include an annex with operational plans for responding to wildfire emergencies and a checklist for facility personnel to use during the emergency. This annex must include checklists that reflect lessons learned from past emergencies to ensure necessary supplies and personnel are available. An EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 E	**(e) (1) (B)**	Compliance with Regulations - Load Shed Annex (T&D)	• Include a load shed annex with procedures for controlled shedding of load and lists of priorities for restoring service to customers who were affected by load shedding. This annex must contain procedures for maintaining an accurate registry of critical load customers that is updated as necessary, but at least annually. This annex must also contain procedures addressing aiding critical load customers in the event of an unplanned outage; communicating with critical load customers during an emergency; coordinating with government and service agencies as necessary during an emergency; and training staff with respect to serving critical load customers. • File an EOP annex for each facility that conspicuously identifies the facility to which it applies.

15 F	**(e) (2) (B)**	Compliance with Regulations - Water Shortage Annex (gen only)	• Include a water shortage annex that addresses supply shortages of water used in the generation of electricity for generation facilities. • File an EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 G	**(e) (2) (C)**	Compliance with Regulations - Restoration of Service Annex (gen only)	• A restoration of service annex that identifies plans and procedures to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat. File an EOP annex for each facility that conspicuously identifies the facility to which it applies.
15 H	**N/A**	Compliance with Regulations - Flooding Annex (if in flood zones)	• Include an annex with operational plans for responding to flooding emergencies and a checklist for facility personnel to use during the emergency. This annex must include checklists that reflect lessons learned from past emergencies to ensure necessary supplies and personnel are available. File an EOP annex for each facility that conspicuously identifies the facility to which it applies.
16 A	**(c) (4) (C)**	Compliance with Regulations - EOP Required Content and Affidavit	• File a complete copy with the Commission with all confidential portions removed. File an unredacted EOP with ERCOT if operating within the ERCOT power region. Make an unredacted EOP available in its entirety to Commission staff, if requested, at a location designated by Commission staff.
16 B	**(c) (3)**	Compliance with Regulations - EOP Required Content and Affidavit	• Demonstrate continuous maintenance of an EOP.
16 C	**(c) (4) (C) (ii)**	Compliance with Regulations - EOP Required Content and Affidavit	• Appropriate executives have reviewed and approved the EOP.
16 D	**(d) (1) (D)**	Compliance with Regulations - EOP Required Content and Affidavit	• An approval in the form of a signed statement formally recognizing and adopting the plan, how it will be implemented, and indicating that it supersedes all previous plans.
16 E	**(c) (1) (i)**	Compliance with Regulations - EOP Required Content and Affidavit	• Executive Summary (Describe the contents and policies contained in the EOP. Include a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of the rule. Contain the affidavit required under 16 TAC §25.53(c)(4)(C).)
16 F	**(c) (4) (A)**	Compliance with Regulations - EOP Required Content and Affidavit	• Record of distribution (Contain, in table format, the titles and names of persons in the entity's organization receiving access to and training on the EOP. Contain dates of access to or training on the EOP.)
16 G	**(c) (4) (B)**	Compliance with Regulations - EOP Required Content and Affidavit	• Emergency Contacts (List the primary contacts for the entity. List the secondary contacts for the entity. Identify specific individuals available immediately to address urgent requests) and questions from the Commission during an emergency.
16 H	**(d) (1) (A)**	Compliance with Regulations - EOP Required Content and Affidavit	• An introduction.

16 I	**(d) (1) (A)**	Compliance with Regulations - EOP Required Content and Affidavit	• An outline of the applicability of the plan.
16 J	**(d) (1) (B)**	Compliance with Regulations - EOP Required Content and Affidavit	• A list of the individuals responsible for maintaining and implementing the EOP.
16 K	**(d) (1) (B)**	Compliance with Regulations - EOP Required Content and Affidavit	• A list of the individuals who can change the EOP.
16 L	**(d) (1) (C)**	Compliance with Regulations - EOP Required Content and Affidavit	• A revision control summary that lists the dates of each change made to the EOP since the initial EOP filing.
16 M	**(d) (1) (D)**	Compliance with Regulations - EOP Required Content and Affidavit	• The date the EOP was most recently approved by the entity.
16 N	**(c) (4) (C) (iv)**	Compliance with Regulations - EOP Required Content and Affidavit	• The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
16 O	**(c) (4) (C) (v)**	Compliance with Regulations - EOP Required Content and Affidavit	• The entity maintains a business continuity plan addressing the return to normal operations after disruptions caused by an incident.
16 P	**(c) (4) (C) (vi)**	Compliance with Regulations - EOP Required Content and Affidavit	• The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Appendix B: Assessment Framework Maturity Matrix

Table B-25. Maturity Rating Matrix

In assessing maturity within the context of an EOP, the review team leveraged this framework based solely on information and processes described in an entity's EOP; thus, the framework provides a repeatable method to assess maturity of an EOP or group of EOPs taken together. However, this framework does not consider information or processes that may be in place at an electric entity through programs and processes outside of the EOP. In addition, this framework is based on defined weather emergency preparedness best practices that are beyond minimum regulatory requirements.

Indicator	High (3)	Medium (2)	Low (1)
Indicator 1 – ICS Structure	• ICS structure and governance are explicitly defined and fully integrated. • Continuous improvement framework to track and address lessons learned is established. • Revisions to the plan are tracked, and actions to address updates are recorded.	• ICS structure and governance are defined. • Continuous improvement framework to track and address lessons learned is not established. • Revisions to the plan are not shown to be tracked, and actions to address updates are not shown as recorded.	• Plan does not include ICS and governance structure used during an emergency response.
Indicator 2 – Asset Management and Inspections	• Plans include multiple practices in place to ensure that critical infrastructure will properly operate during adverse weather events. • Plans include procedures to maintain preidentified supplies for an emergency response. • Critical assets are identified and listed. • Potential points of failure and plans for quick remediation are well defined. • Process is set up for how critical supplies and backup equipment are inventoried and strategically deployed.	• Plan includes some system inspection practices (e.g., vegetation management). • Critical assets and potential points of failure are not identified. • Plans for quick remediation during an emergency are not defined. • Process is not set up for how critical supplies and backup equipment are inventoried and strategically deployed for weather events. • Procedures to maintain preidentified supplies for an emergency response are missing.	• Plan includes limited, if any, asset management, and inspections practices. • Procedures to identify potential points of failure and plans for quick remediation during an emergency are not established.
Indicator 3 – Risk Management	• Plans include multiple processes, procedures, and checklists used to assess system readiness and risks in advance of adverse weather events. • Winter/summer weatherization and hurricane/flood/wildfire procedures and	• Plan includes some processes and procedures used to assess system readiness and risks to safe and reliable electric service in advance of adverse weather events. • However, plans are not fully complete or are poorly documented.	• Plan does not include any processes or procedures used to assess system readiness and risks to safe and reliable electric service in advance of weather threat.

Indicator	High (3)	Medium (2)	Low (1)
	checklists are well documented. • Plans include procedures and actions to take during an emergency if an anomaly occurs to remediate the situation.	• None or partial procedures or checklists to prepare for winter, summer, hurricane, etc. season are established. • Procedures to take during an emergency, including instructions on immediate remediation actions if an anomaly occurs are missing.	
 **Indicator 4 –** Staffing	• Roles and responsibilities are well defined. • Staff are identified to estimate and acquire resources in preparation for adverse weather events and during execution of EOP. • Resource planning and acquisition practices are in place, providing for additional or backup staff, for responding to large-scale emergencies.	• Roles and responsibilities are well defined. • Specific staff are not identified to estimate and acquire resources in preparation for adverse weather events and during execution of EOP. • No additional or backup staff are identified.	• Roles and responsibilities are not well defined, and no staff identified to estimate and acquire resources in preparation for adverse weather events and during execution of EOP. • No additional or backup staff are identified, which may be required for responding to large-scale emergencies.
 **Indicator 5 –** Mutual Assistance Support	• Plan identifies key stakeholders for mutual aid. • Arrangements for mutual aid have been established. • Establishes associated communications procedures.	• Plan identifies key stakeholders for mutual aid. • However, no communication plans or prearranged agreements for mutual aid have been established.	• Plan does not include mutual aid stakeholder engagement and mutual aid agreement information.
 **Indicator 6 –** Training and Emergency Drills	• Emergency management teams and their backup counterparts are trained for their specific EOP roles. • Personnel training programs are tracked. • Drills for all relevant hazards are performed at least once a year. • Process is set up to track lessons learned and their remediation.	• Limited number of emergency management staff are trained for their specific EOP roles. • No indication of training conducted for their backup counterparts. • Drills for all relevant hazards are performed at least once a year. • Process is not set up to track lessons learned and their remediation.	• Emergency management teams and their backup counterparts are not trained for their specific EOP roles. • Drills for all relevant hazards are not performed at least once a year. Process is not set up to track lessons learned and their remediation.
 **Indicator 7 –** Situational Awareness	• Plans include a process to recognize an adverse weather event and deployment of situational awareness approaches and technologies. • Processes assure situational awareness is deployed during all phases of severe weather response.	• Plan provides a high-level process to recognize an adverse weather event and describes high-level details of situational awareness tools and capabilities, • Does not provide specific details as to the application of those tools during the various weather events.	• Plan does not include a process to recognize an adverse weather event and deployment of situational awareness approaches and technologies.

Indicator	High (3)	Medium (2)	Low (1)
	• Entities report foundational tools and processes for situational awareness.		
 **Indicator 8 –** System Design and Hardening	• Plan includes an approach to short-term system hardening and long-term system improvements for weather-related events. • Preventative mitigation actions to upgrade the system are performed.	• Plan includes an approach to short-term or (seasonal) system hardening for weather-related events, but not both. • Preventative mitigation actions to upgrade the system are performed, but limited.	• Plan does not address system hardening efforts (short-term or long-term) to prepare for weather-related events.
 **Indicator 9 –** Communication System	• Primary and secondary communication systems and protocols are established and used to communicate with the organizations during emergency response. • Incorporation of technology into communication plans is consistent throughout the entire organizations.	• Only primary communication systems and protocols are established and used to communicate within the organization during the emergency response. • However, no backup communication system in place in case the primary communication system is unavailable. • Incorporation of technology into communication plans is not fully consistent throughout the entire organization.	• Plan does not provide an overview of internal communication systems.
 **Indicator 10 –** Activation of EOP	• Plan specifies conditions and staff responsible for activating the EOP. • Decision-makers needed to activate EOP are clearly defined. • Plans include detailed processes that include notification and activation of staffing needs.	• Plan provides weather conditions for activating the EOP, • Staff/ decision-makers' responsibilities for activation of the EOP are not described.	• Plan does not describe the process for the activation of the EOP.
 **Indicator 11 –** Emergency Management and Planning Systems, Technologies, and Automation	• Multiple systems, tools, technologies, and automation processes that support the execution and tracking of staff's emergency response and streamline management and reporting are established. • Demonstrated use of advanced tools and software to track equipment, staff, responsibilities, completed actions, issues, metrics, and benchmarks prior to and during emergency response.	• Plan does not demonstrate a prevalent use of advanced tools and software critical for emergency management. • Plan describes a system, tool, technology, or automation process that supports execution and tracking of staff's emergency response. • However, application is limited, untested or vague, which may deem it unreliable prior at and during an emergency.	• Plan does not describe any systems, tools, technologies, or automation practices that the entity will use during a weather emergency to streamline its operations.

Indicator	High (3)	Medium (2)	Low (1)
 **Indicator 12 –** Public Communications	• Plan demonstrates prevalent use of a diverse set of communication channels, such as email, phone calls and texts, cable media, and social media to communicate with the public before, during, and after an adverse weather event. • Communication plan is established with the following groups: the media; customers; fuel suppliers; the Commission; the OPUC; local and state governmental entities, officials, and emergency operations centers, the RC; and critical load customers. • Procedures for handling customer complaints are addressed (except generation only entities).	• Plan includes communication protocols for providing weather-related emergency information to some groups, but not all relevant stakeholders. • Significant gaps exist in providing timely communication with the public beyond media and regulatory bodies. PGCs only need to show communication protocols with the media and regulatory bodies, since they do not serve customers directly.	• Plan does not include an established communication plan for communicating with the public, customers, and stakeholders pre-, during and post an extreme weather event.

Appendix C: Glossary

Table C-26. Glossary

Term	Definition
C	
Critical load customer	Nonresidential customer whose load is designated as feeding the following uses: • Hospitals and nursing homes • Fire, Police, and 911 Stations • Some Wastewater and Water Treatment facilities • Specific components of the natural gas infrastructure • Industrial customers for whom an interruption would create life-threatening conditions
D	
Derate	Decrease in the available capacity of an electric generating unit
E	
Electric Reliability Council of Texas	Organization that operates Texas's electrical grid, the Texas Interconnection, which supplies power to more than 25 million Texas customers and represents 90% of the state's electric load
Emergency operations plan	Guide for the preparation, mitigation, response, and recovery from an emergency
Extreme weather	Occurrences of unusually severe weather or climate conditions that can cause devastating impacts on communities and agricultural and natural ecosystems
L	
Load shedding	Intentional action by a utility that results in the reduction of more than 100 megawatts (MW) of firm customer load for reasons of maintaining the continuity of service of the reporting entity's bulk electric power supply system
N	
National weather service	Agency of the U.S. federal government that is tasked with providing weather forecasts, warnings of hazardous weather, and other weather-related products to organizations and the public for the purposes of protection, safety, and general information
O	
Outage	The loss of the electrical power network supply to an end user
P	
Power grid	System of synchronized power providers and consumers connected by transmission and distribution lines and operated by one or more control centers
Power region	Geographical service area for electric service operations. For the purposes of this report, power region refers to the ERCOT service area or non-ERCOT service areas.
R	
Reliability Coordinator	An entity with the highest level of authority who has the authority to prevent or mitigate emergency operating situations in real time operations and post-event analysis.
W	
Weatherization	The process of protecting a structure from outside elements

Appendix D: Acronyms

Table D-27. Acronyms

Abbreviation	Definition
AIS	Agency Information System
Co-ops	Electric Cooperatives
ERCOT	Electric Reliability Council of Texas
EOP	Emergency Operations Plan
FCITC	First Contingency Incremental Transfer Capability
ICS	Incident Command System
IOUs	Investor-Owned Utilities
MCRs	Aggregates MOUs, Co-ops, and RAs into one group because each category individually has a small number of entities
MISO	Midcontinent Independent System Operator
MOUs	Municipally Owned Utilities
NERC	North American Electric Reliability Corporation
PGCs	Power Generation Companies
PUCT	Public Utility Commission of Texas
QA/QC	Quality Assurance / Quality Control
RA	River Authority
RC	Reliability Coordinator
REPs	Retail Electric Providers
SPP	Southwest Power Pool
TAC	Texas Administrative Code
TDU	Transmission and Distribution Utilities
TSP	Transmission Service Provider