

**Congress of the United States**  
**House of Representatives**

COMMITTEE ON OVERSIGHT AND REFORM

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6143

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March 3, 2021

Mr. Bill Magness  
President and Chief Executive Officer  
Electric Reliability Council of Texas  
7620 Metro Center Drive  
Austin, Texas 78744

Dear Mr. Magness:

The Subcommittee on Environment requests information and documents regarding the lack of preparation by the Electric Reliability Council of Texas (ERCOT) for the recent winter storm that caused millions of power outages across the state. The Subcommittee also seeks information regarding ERCOT's response to the winter storm and its preparedness for future storms.

Extreme winter weather events in Texas have occurred repeatedly over decades and ERCOT has been unprepared for them. ERCOT's own consultant has predicted that such extreme winter weather events will continue to occur every decade. The Subcommittee is concerned that the loss of electric reliability, and the resulting human suffering, deaths, and economic costs, will happen again unless ERCOT and the State of Texas confront the predicted increase in extreme weather events with adequate preparation and appropriate infrastructure.

### **Extreme Winter Weather and Power Outages in 2021**

Public reporting indicates that generation sources in the state were unprepared for the low temperatures in February. The cold spell drove power generators offline, shrinking the available supply while demand spiked.<sup>1</sup> Moisture in uninsulated gas pipelines caused them to freeze. The pumps and diesel engines needed to power them could not start. A reactor at a nuclear power plant went offline because frozen pipes prevented operation of its cooling system.<sup>2</sup> Despite false claims from Texas officials that the power outages were attributable to renewable sources like wind turbines, the vast majority of the dip in electricity supply came from fossil fuel generation

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<sup>1</sup> Energy Information Administration, *Extreme Winter Weather is Disrupting Energy Supply and Demand, Particularly in Texas* (Feb. 19, 2021) (online at [www.eia.gov/todayinenergy/detail.php?id=46836](http://www.eia.gov/todayinenergy/detail.php?id=46836)).

<sup>2</sup> *The Texas Grid Got Crushed Because Its Operators Didn't See the Need to Prepare for Cold Weather*, Washington Post (Feb. 16, 2021) (online at [www.washingtonpost.com/business/2021/02/16/ercot-texas-electric-grid-failure/](http://www.washingtonpost.com/business/2021/02/16/ercot-texas-electric-grid-failure/)).

sources.<sup>3</sup> Renewable sources of energy only make up roughly 10% of power in Texas, while over half of the energy comes from fossil fuels such as power plants fired by natural gas.<sup>4</sup>

Low-income and minority communities were disproportionately affected by power outages. Neighborhoods with predominately Black and Latinx residents have reportedly been among the first to lose power. Vulnerable communities have less resources to relocate or deal with increased electricity bills. In past disasters, these areas also take longer to fully recover.<sup>5</sup>

The failures of ERCOT and the State of Texas were costly. Dozens of Texans have died and the number of confirmed deaths continues to grow.<sup>6</sup> At least 4.5 million people experienced power outages.<sup>7</sup> There has been a sudden increase in cases of carbon monoxide poisoning.<sup>8</sup> Homeowners, renters, and businesses face steep expenses to fix damage from frozen and burst pipes, with the Texas Insurance Council estimating that claims could be more than \$20 billion.<sup>9</sup> The total economic losses in Texas could reach \$50 billion when factoring in property and infrastructure damage, lost wages, business and crop losses, and medical costs.<sup>10</sup>

ERCOT has limited ability to import electricity from outside of the state because it operates as its own interconnection independent from the rest of the United States. Nearby areas outside of ERCOT's region, such as El Paso, experienced the same extreme temperatures but fewer disruptions.<sup>11</sup>

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<sup>3</sup> *Gov. Greg Abbott and Other Republicans Blamed Green Energy for Texas' Power Woes. But the State Runs on Fossil Fuels*, The Texas Tribune (Feb. 17, 2021) (online at [www.texastribune.org/2021/02/17/abbott-republicans-green-energy/](http://www.texastribune.org/2021/02/17/abbott-republicans-green-energy/)).

<sup>4</sup> Energy Information Administration, *Texas State Profile and Energy Estimates* (online at [www.eia.gov/state/analysis.php?sid=TX](http://www.eia.gov/state/analysis.php?sid=TX)) (accessed Feb. 19, 2021).

<sup>5</sup> *Texas Blackouts Hit Minority Neighborhoods Especially Hard*, New York Times (Feb. 16, 2021) (online at [www.nytimes.com/2021/02/16/climate/texas-blackout-storm-minorities.html](http://www.nytimes.com/2021/02/16/climate/texas-blackout-storm-minorities.html)).

<sup>6</sup> *Many Texans Have Died Because of the Winter Storm. Just How Many Won't Be Known for Weeks or Months*, Texas Tribune (Feb. 19, 2021) (online at [www.texastribune.org/2021/02/19/texas-power-outage-winter-storm-deaths](http://www.texastribune.org/2021/02/19/texas-power-outage-winter-storm-deaths)).

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Insurance Claims Pile Up After Texas' Devastating Winter Storm*, The Dallas Morning News (Feb. 22, 2021) (online at [www.dallasnews.com/business/2021/02/22/insurance-claims-pile-up-after-texas-devastating-winter-storm](http://www.dallasnews.com/business/2021/02/22/insurance-claims-pile-up-after-texas-devastating-winter-storm)).

<sup>10</sup> *AccuWeather Estimates Economic Impact of Winter Storms to Approach \$50 Billion*, AccuWeather (Feb. 17, 2021) (online at [www.accuweather.com/en/winter-weather/accuweather-estimates-economic-impact-of-winter-storms/902563](http://www.accuweather.com/en/winter-weather/accuweather-estimates-economic-impact-of-winter-storms/902563)).

<sup>11</sup> *'Those in Power Have Failed Us': Twitter Reacts As El Paso Escapes Outages, but Texas Suffers*, El Paso Times (Feb. 17, 2021) (online at [www.elpasotimes.com/story/news/2021/02/17/el-paso-escapes-texas-power-grid-outage-blackouts-twitter-reacts/6779111002/](http://www.elpasotimes.com/story/news/2021/02/17/el-paso-escapes-texas-power-grid-outage-blackouts-twitter-reacts/6779111002/)).

## **Extremely Cold Winters Were Predicted, So Why Was ERCOT Not Prepared?**

This is not the first or even second time in recent history that an extreme winter weather event has caused electricity blackouts in Texas.

In 1989, cold weather also disrupted electric reliability, causing outages of 56 generating units and capacity loss of 16,805 Megawatts. Increased demand combined with the generation failures required ERCOT to implement system-wide blackouts for the first time in its history. The Public Utilities Commission of Texas (PUCT) examined the cause of generator outages and recommended that new power facilities be built to withstand extreme temperatures, and that producers needed to annually review generators to ensure that they could operate in the cold, maintain insulation and heat tracing systems in working order, and train plant personnel on cold weather procedures.<sup>12</sup>

In February 2011, 210 generating units experienced some disruption during extremely cold temperatures and deprived reliable electricity to about 3.2 million customers within ERCOT's region.<sup>13</sup> The outages caused two hospitals in Dallas to lose power, even as the Dallas Cowboys stadium stayed online to prepare for the Super Bowl.<sup>14</sup> Consumers were asked to start conserving power between 6:00 a.m. and 9:00 a.m. The blackouts left almost 1 million households without heat, created traffic jams as traffic lights went down, and forced schools and businesses to close.<sup>15</sup>

Following the 2011 event, the Federal Energy Regulatory Commission (FERC) and North American Electric Reliability Corporation (NERC) conducted an investigation, which found disturbing similarities between the power disruptions in 1989 and 2011. The report stated:

Despite the recommendations issued by the PUCT in its report in the 1989 event, the majority of the problems generators experienced in 2011 resulted from failures of the

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<sup>12</sup> North American Electric Reliability Corporation, *Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011* (Aug. 2011) (online at [www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW\\_Cold\\_Weather\\_Event\\_Final.pdf](http://www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW_Cold_Weather_Event_Final.pdf)); see also Public Utility Commission of Texas, *Electric Utility Response to the Winter Freeze of December 21 to December 23, 1989: An Evaluation of the Actions Taken by Texas Utilities to Correct Technical Plant Equipment Problems* (Nov. 1990) (online at <https://lrl.texas.gov/scanned/archive/1990/15303.pdf>).

<sup>13</sup> North American Electric Reliability Corporation, *Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011* (Aug. 2011) (online at [www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW\\_Cold\\_Weather\\_Event\\_Final.pdf](http://www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW_Cold_Weather_Event_Final.pdf)).

<sup>14</sup> *Super Bowl in Super Weather Mess: Dallas Hit with Bitter Cold, Ice*, ABC News (Feb. 3, 2011) (online at <https://abcnews.go.com/US/dallas-hit-bitter-cold-ice-super-bowl/story?id=12832352>).

<sup>15</sup> *Texas Weathers Rolling Blackouts as Mercury Drops*, Reuters (Feb. 2, 2011) (online at [www.reuters.com/article/us-ercot-rollingblackouts/texas-weathers-rolling-blackouts-as-mercury-drops-idUSTRE71213420110203](http://www.reuters.com/article/us-ercot-rollingblackouts/texas-weathers-rolling-blackouts-as-mercury-drops-idUSTRE71213420110203)).

very same type of equipment that failed in the earlier event. And in many cases, these failures were experienced by the same generators.<sup>16</sup>

Not only did the FERC/NERC report find that lessons learned from the 1989 winter weather event were either not implemented or not maintained, but also that ERCOT's own weather consultant observed that extreme winter weather in Texas was predictable: "The 2011 winter weather event has been determined by at least one weather service to be a one in 10 year occurrence for some regions of Texas, in terms of low temperatures and duration."<sup>17</sup>

It appears that lessons learned (again) in 2011 were not implemented either, leaving Texas vulnerable to extreme winter weather again in 2021.

### **Increased Extreme Weather Events are Connected to Climate Change**

The consensus view among climate scientists is that the Earth is warming due to human-caused activities and that extreme weather events are the predictable result. The extreme winter weather experienced by Texas is a known risk of global warming.<sup>18</sup>

The average global surface temperature has already risen by 1.84 degrees Fahrenheit from the pre-industrial average.<sup>19</sup> Greenhouse gas emissions, primarily caused by the burning of fossil fuels, trap heat in the atmosphere, causing the average temperature of the earth to rise.<sup>20</sup> The effects are being felt in Texas, which is vulnerable to both hurricanes and extreme winter weather. Hurricane Harvey, which hit Texas in 2017, was the second most expensive tropical cyclone to ever hit the United States, causing flooding in over 300,000 structures, 336,000 customers to lose power, and was directly responsible for the deaths of at least 68 Texans.<sup>21</sup> But it was far from the only major hurricane to affect Texas. In the last 30 years, 13 tropical

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<sup>16</sup> North American Electric Reliability Corporation, *Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011* (Aug. 2011) (online at [www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW\\_Cold\\_Weather\\_Event\\_Final.pdf](http://www.nerc.com/pa/trm/ea/February%202011%20Southwest%20Cold%20Weather%20Event/SW_Cold_Weather_Event_Final.pdf)).

<sup>17</sup> *Id.* See for instance: "This cold weather event was thus unusual in terms of temperature, wind, and duration. It was not, however, entirely without precedent. The Southwest experienced other cold weather events in 1983, 1989, 2003, 2006, 2008, and 2010. In fact, two of those years, 1983 and 1989, had lower temperatures than 2011."

<sup>18</sup> National Aeronautics and Space Administration, *The Effects of Climate Change* (online at <https://climate.nasa.gov/effects/>) (accessed Feb. 25, 2021); see also Judah Cohen, Karl Pfeiffer, and Jennifer A. Francis, *Warm Arctic Episodes Linked With Increased Frequency of Extreme Winter Weather in the United States* (Mar. 13, 2018) (online at [www.nature.com/articles/s41467-018-02992-9](http://www.nature.com/articles/s41467-018-02992-9)).

<sup>19</sup> National Aeronautics and Space Administration, *Global Temperature* (online at <https://climate.nasa.gov/vital-signs/global-temperature/>) (accessed Feb. 23, 2021).

<sup>20</sup> National Aeronautics and Space Administration, *Climate Change: How Do We Know?* (online at <https://climate.nasa.gov/evidence/>) (accessed Feb. 23, 2021).

<sup>21</sup> National Oceanic and Atmospheric Administration, National Hurricane Center, *National Hurricane Center Tropical Cyclone Report: Hurricane Harvey* (May 9, 2018) (online at [www.nhc.noaa.gov/data/tcr/AL092017\\_Harvey.pdf](http://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf)).

cyclones made landfall in Texas at hurricane strength. In the 30 years before that, just five hurricanes hit Texas.<sup>22</sup>

A recent study linked warming in the Arctic to more frequent severe winter weather in the United States. As the average global temperature has risen in the past two to three decades, there have been more cold spells and heavy snowfalls during winters in North America.<sup>23</sup>

The risk of increased extreme winter weather events in the United States underscores the need for adequate preparation. ERCOT and the State of Texas are well-aware of the weather predictions, yet you have failed to prepare adequately for them. It is the hope of the Subcommittee that greater public attention and accountability will cause this cycle to change.

### **Request for Information and Documents**

In order determine why Texans have endured decades of blackout events and compromised electric reliability during the extreme winter weather events, the Subcommittee requests the following information by March 17, 2021:

1. All documents relating to preparations, from 2010 to the present, for an extreme winter weather event, including but not limited to:
  - a. communications with the PUCT;
  - b. communications with state officials and employees;
  - c. communications with technical and scientific advisory committees and task forces;
  - d. internal communications among ERCOT Board members, senior executives and members, including cooperatives, independent generators, independent power marketers, independent retail electric providers, investor-owned utilities, municipals, cooperatives and adjunct members;
  - e. ERCOT Board meeting minutes; and
  - f. communications about how extreme weather or climate change affects electric reliability; and
  
2. With respect to the disruption of electric supply in the extreme winter weather event of February 13 to 17, 2021, a description of every power generation unit that experienced failure, including for each:
  - a. the cause and duration of failure;
  - b. the generation unit's age, temperature design parameters, and type of fuel;
  - c. all modifications implemented to withstand extreme winter weather;

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<sup>22</sup> National Oceanic and Atmospheric Administration, *Historical Hurricane Tracks* (online at <https://coast.noaa.gov/hurricanes/#map=4/32/-80>) (Accessed Feb. 25, 2021).

<sup>23</sup> Judah Cohen, Karl Pfeiffer, and Jennifer A. Francis *Warm Arctic Episodes Linked With Increased Frequency of Extreme Winter Weather in the United States* (Mar. 13, 2018) (online at [www.nature.com/articles/s41467-018-02992-9](http://www.nature.com/articles/s41467-018-02992-9)).

- d. the generation unit's capacity and whether it is used for base or peak demand; and
  - e. if the generation unit also experienced disruption during any other extreme winter weather event, including those in 2011 and 1989; and
3. With respect to the disruption of electric supply in the extreme winter weather event of February 13 to 17, 2021, all communications referring or relating to causes of the disruption and/or preparations for future extreme weather events between ERCOT and:
  - a. PUCT;
  - b. Governor Greg Abbott; and
  - c. any other state or federal employee or official; and
4. All documents relating to decisions on where and when to implement rolling blackouts related to the extreme winter weather event of February 13 to 17, 2021;
5. All documents relating to the winter 1989 disruption in electric reliability, including, but not limited to:
  - a. any documents provided to FERC and/or NERC in connection with the 1989 disruption;
  - b. all reports and analyses by the PUCT, ERCOT and any other entity about the causes of the disruption;
  - c. all communications, analyses and plans relating to recommendations made by the PUCT;
  - d. all communications with federal, state, and local officials, including Governors Bill Clements and Ann Richards;
  - e. all communications with corporations, academics, and non-governmental organizations;
  - f. all communications among ERCOT's Board members, senior executives, and members, including cooperatives, independent generators, independent power marketers, independent retail electric providers, investor-owned utilities, municipals, cooperatives and adjunct members; and
  - g. ERCOT Board meeting minutes; and
6. All documents relating to the winter 2011 disruption in electric reliability, including, but not limited to:
  - a. all documents provided to FERC and/or NERC in connection with their investigation into the 2011 disruption;
  - b. all communications, analyses and plans relating to the 26 recommendations made by FERC and NERC in their report, "Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011";

- c. all communications with federal, state and local officials and employees, including Governor Rick Perry;
- d. all communications from corporations, academic, non-governmental organizations;
- e. all communications among ERCOT's Board members, senior executives, and members, including cooperatives, independent generators, independent power marketers, independent retail electric providers, investor-owned utilities, municipals, cooperatives and adjunct members; and
- f. ERCOT Board meeting minutes.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. An attachment to this letter provides additional instructions for responding to the Committee's request. If you have any questions regarding this request, please contact Subcommittee staff at (202) 225-5051.

Sincerely,

A handwritten signature in black ink that reads "Ro Khanna". The signature is written in a cursive style with a long horizontal stroke at the end.

Ro Khanna  
Chairman  
Subcommittee on Environment

Enclosure

cc: The Honorable Ralph Norman, Ranking Member  
Subcommittee on Environment

## Responding to Oversight Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.
5. Documents produced in electronic format should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
  - a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
  - b. Document numbers in the load file should match document Bates numbers and TIF file names.
  - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
  - d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:  
  
BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,



INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION,  
BEGATTACH.

7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.
8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.
9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.
10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.
11. The pendency of or potential for litigation shall not be a basis to withhold any information.
12. In accordance with 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building.
21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

### **Definitions**

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic

message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.

3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
4. The term “including” shall be construed broadly to mean “including, but not limited to.”
5. The term “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; (b) the individual’s business or personal address and phone number; and (c) any and all known aliases.
7. The term “related to” or “referring or relating to,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.
8. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
9. The term “individual” means all natural persons and all persons or entities acting on their behalf.