



Weather Emergency Preparedness FAQs

Question	Answer
1) What is driving the emphasis on weather emergency preparedness?	In response to Winter Storm Uri, Texas Senate Bill 3 was signed by Governor Abbott on 6/8/21. In October, the Public Utility Commission of Texas (PUC) approved a new rule (16 TAC § 25.55) which requires generation entities (GE) and transmission service providers (TSP) to complete winter weather emergency preparation measures and submit winter weather readiness reports (WWRR) by 12/1/21, among other things.
2) Where can I find the new PUC rule?	The text of the PUC's new rule starts on page 86 of the document at this link .
3) What do I have to do?	Each GE must complete the winter weather emergency preparation measures described in the rule for each Resource under its control. Each TSP must complete the winter weather preparations described in the rule for its transmission system and facilities. GEs and TSPs must submit WWRRs.
4) What are the key regulatory milestones for GEs and TSPs?	WWRRs must be submitted by 12/1/21.
5) How will ERCOT distribute the WWRR forms and who will receive them?	ERCOT will send a link to the DocuSign WWRR form for each Generation Resource or Energy Storage Resource via email to the Authorized Representative (AR) for the Resource Entity that corresponds to that Resource, and to the Authorized Representative for each TSP.
6) What should I do if I do not receive a WWRR form?	Notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or clientservices@ercot.com .
7) What should I do if I accidentally reject or lose the WWRR form email?	Notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or clientservices@ercot.com .
8) How do I forward the WWRR form email?	Follow the DocuSign instructions and the email will be forwarded automatically.
9) Are we going to use the same WWRR form each year?	Probably not. The PUC anticipates establishing additional weatherization standards in 2022. Those standards will probably precipitate new reporting and inspection obligations.
10) As a RE, do I have to submit a WWRR for each Resource or can I do it by fleet?	A separate WWRR must be submitted for each Resource.
11) If I have additional questions, who can I talk to?	You should contact your ERCOT Account Manager or the ERCOT Client Services group at 512-248-3900 or ClientServices@ercot.com .
12) Who at my company is supposed to sign the notarized attestation?	The highest-ranking representative, official, or officer with binding authority over the GE or TSP.
13) Do I have to attach the entire document to DocuSign?	No. The WWRR will be generated automatically by DocuSign. The only document that must be attached is the notarized attestation.



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14) What are the size limitations to DocuSign attachments?	Each individual document must be <25 MB.
15) What is the maximum size of an entire DocuSign envelope?	Tests have demonstrated that total sizes >100 MB have been problematic.
16) Can I submit multiple attachments to the same question?	Yes.
17) What should I do if there is something wrong with the DocuSign information?	You should contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or ClientServices@ercot.com .
18) Do I have to attach something?	Yes, a notarized attestation must be attached to each WWRR.
19) What if the AR is sick or unavailable?	It is the responsibility of the GE or TSP to ensure a timely response. Contact your Account Manager or ERCOT Client Services if the WWRR needs to be sent to the Backup AR.
20) Do I need a DocuSign account prior to receiving the WWRR form?	No. The account will be generated automatically using the email address of the AR when ERCOT sends the WWRR form.
21) What is the difference between asserting a good cause for noncompliance and submitting a request for approval of a good cause exception?	GEs and TSPs can assert one or more good cause for noncompliance in their WWRR. PUC staff will work with ERCOT to expeditiously review these assertions or notices. PUC staff may notify a GE or TSP that it disagrees with the assertion. In this case, and to preserve the good cause exception, the GE or TSP must submit a request to the PUC for approval of a good cause exception within seven days of receipt of the notification.
22) How do I know if my facility will be inspected by ERCOT?	You will be notified by ERCOT at least 48 hours prior to the inspection.
23) Are the weatherization inspections going to change in the future?	This depends on the outcome of the PUC's phase 2 rulemaking next year. Future workshops will address changes for future weatherization inspections.
24) How did my Resource get selected for the inspections?	ERCOT selected those generating facilities that had the most MWh lost during Winter Storm Uri. These facilities, in the aggregate, contributed 85% of the lost MWhs during that period.
25) How did my Transmission facility get selected for inspection?	ERCOT is still finalizing the methodology for selecting the Transmission facilities that will be inspected.
26) Do I need to schedule the visit?	No. You will be notified of the date and time of the scheduled visit by ERCOT.
27) Will the list of facilities being inspected be made public?	No. ERCOT intends to treat that information as Protected Information.
28) How many facilities are being inspected this winter?	Over 300 Generation Resources and Energy Storage Resources and over 20 Transmission facilities will be inspected.



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29) What should I do if we have an unplanned emergency and can't facilitate the inspection and need to reschedule?	You must notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 if an emergency would require a reschedule.
30) Do we have to pay for the inspection before it occurs?	No. ERCOT anticipates sending an invoice to the RE or TSP after the inspection.
31) How will the GE or TSP be billed?	Fees will be invoiced using a Resource-specific code number and payments should be made to ERCOT via check or wire transfer using this number.
32) Will this inspection be remote or on-site?	All inspections will be scheduled as on-site visits.
33) How long will the inspection last?	Resource inspections are anticipated to last up to one full day on-site with the potential for follow up remote or on-site visits if required. ERCOT anticipates that TSP facility inspections will be completed in less than one full day.
34) Is this a NERC inspection?	No. These inspections are in response to PUC Rule 16 TAC §25.55 and are not NERC inspections.
35) Who will be coming on-site for the inspections?	ERCOT has engaged consultants to assist with Resource inspections. Staff from the consulting companies will be on-site, in some cases accompanied by ERCOT and PUC staff. ERCOT intends to conduct most TSP inspections and may be accompanied by PUC staff.
36) Can we be inspected earlier than December 2021?	Yes, if a WWRR has been submitted for the Resource before 12/1/21. Most of the inspections are anticipated to occur between 12/2/21 and 12/23/21.
37) What content will be in the inspection reports and who will see them?	Inspection reports will address whether the inspected GE or TSP has complied with applicable requirements of the PUC rule with respect to the Resource or facility inspected. ERCOT will provide the GE or TSP with a reasonable period to cure any identified deficiencies. ERCOT intends to treat the inspection reports as Protected Information and withhold them from public disclosure.
38) What happens if my Resource or TSP facility has deficiencies identified through the inspection process?	The Generation Entity or TSP will be given a cure period to remedy each deficiency. The GE or TSP may request a different amount of time with documentation supporting that request. ERCOT, in consultation with PUC staff, will then determine the final cure period.
39) What happens if my Resource or TSP facility cannot remedy the deficiency(ies) within the cure period?	ERCOT will report that generation entity or TSP to PUC staff and they will be subject to the PUC's investigation and enforcement authority.