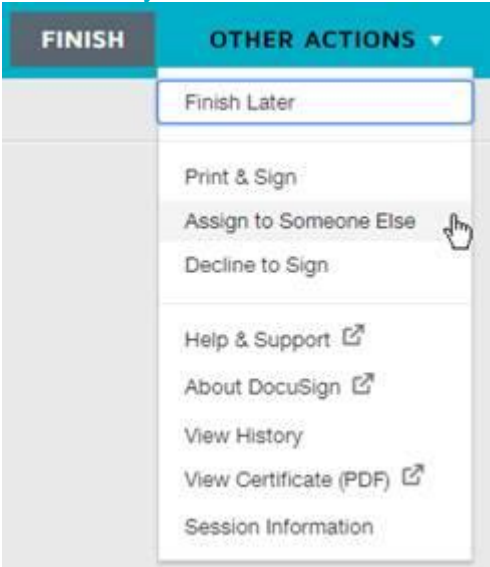




## Weather Emergency Preparedness FAQs

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 <a href="#">this link</a> .
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?	Check your spam or junk email folders.  Have your IT department attempt to retrieve the blocked emails from your email server.  Have your IT department add " <a href="mailto:dse_NA4@docusign.Net">dse_NA4@docusign.Net</a> " as a safe sender or add "@docusign.net" to the list of allowed email domains.  Notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:clientservices@ercot.com">clientservices@ercot.com</a>
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 <a href="mailto:clientservices@ercot.com">clientservices@ercot.com</a> .

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<p>8) How do I forward the WWRR form email?</p>	<p>Open the document and use the “Assign to someone else” functionality in the “OTHER ACTIONS” menu:</p> 
<p>9) Are we going to use the same WWRR form each year?</p>	<p>Probably not. The PUC anticipates establishing additional weatherization standards in 2022. Those standards will probably precipitate new reporting and inspection obligations.</p>
<p>10) As a RE, do I have to submit a WWRR for each Resource or can I do it by fleet?</p>	<p>A separate WWRR must be submitted for each Resource.</p>
<p>11) If I have additional questions, who can I talk to?</p>	<p>You should contact your ERCOT Account Manager or the ERCOT Client Services group at 512-248-3900 or <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a>.</p>
<p>12) Who at my company is supposed to sign the notarized attestation?</p>	<p>The highest-ranking representative, official, or officer with binding authority over the GE or TSP.</p>
<p>13) Do I have to attach the entire document to DocuSign?</p>	<p>No. The WWRR will be generated automatically by DocuSign. The only document that must be attached is the notarized attestation.</p>
<p>14) What are the size limitations to DocuSign attachments?</p>	<p>Each individual document must be &lt;25 MB.</p>
<p>15) What is the maximum size of an entire DocuSign envelope?</p>	<p>Tests have demonstrated that total sizes &gt;100 MB have been problematic.</p>
<p>16) Can I submit multiple attachments to the same question?</p>	<p>Yes.</p>
<p>17) What should I do if there is something wrong with the DocuSign information?</p>	<p>You should contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a>.</p>
<p>18) Do I have to attach something?</p>	<p>Yes, a notarized attestation must be attached to each WWRR.</p>



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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.
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



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	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.
40) Multiple officers in our company have binding authority. Which one does ERCOT expect to sign the Sworn Attestation?	The Sworn Attestation requires the person signing it to certify that they are "the highest-ranking representative, official, or officer with binding authority . . .," and ERCOT intends to rely exclusively on that certification for purposes of evaluating compliance with the attestation requirement. We encourage all TSPs and Generation Entities to seek advice from their own counsel on which person satisfies the rule's requirement.
41) Can you provide guidance on answering Resource questions 5c-5h on operating limitations based on temperature, precipitation, humidity, wind speed, wind direction, and other winter weather operating limitations?	Please respond with operating limitations based on the listed elements. The Resource Entity might derive its operating limitations based upon original design criteria, engineering evaluations, or operational experience.
42) I did not receive a WWRR form due to being a Settlement Only Generator. What weatherization related	Neither 16 TAC § 25.55 nor the ERCOT Protocols require Resource Entities to provide any weatherization-related documentation for Settlement Only Generators.



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documents must I provide to ERCOT?	
43) Several elements of (c)(1)(A), (c)(1)(B), (f)(1)(A), or (f)(1)(F) are not applicable to my facility. Do we select “No” that we have not complied with all requirements of the subsection?	<p>ERCOT recognizes that some elements of these requirements will not be applicable to many facilities. In this case, if you have complied with all the <i>applicable</i> elements for a given subsection, please select “Yes” for the question regarding compliance with all requirements. Please also describe those elements that you believe are not applicable in the text box for the description of activities engaged in to complete the requirements.</p> <p>If you have not complied with all the <i>applicable</i> elements, select “No.” For the questions that ask which elements the entity has not complied with, please indicate “compliant,” “non-compliant,” or “N/A,” and for responses of “non-compliant” or “N/A” please describe the deficiency or inapplicability in the text box that opens.</p>
44) Will the WWRRs sent to ERCOT be treated as confidential information?	ERCOT intends to treat the Winter Weather Readiness Reports as Protected Information and withhold them from public disclosure. If an entity believes that some of the information included in the WWRR is ERCOT Critical Energy Infrastructure Information (ECEII), please indicate so in the report and provide a justification for that designation.
45) What should I do if my resource has completed Step 2 of the ERCOT commissioning process but will not complete the requirements of Step 3 of that process prior to 12/1/21?	Such a unit will not be required to submit any weatherization documentation prior to 12/1/21. However, if a Resource Entity seeks to complete commissioning during the winter months, a Declaration of Completion of Generation Resource Winter Weather Preparations (Protocols Section 22, Attachment O) will be required for Step 3 approval.
46) If we select N/A in response to a question, do we need to provide additional information in the text box pop-up?	Yes. Please include your rationale as to why you believe the question is not applicable.
47) Is our understanding that 16 TAC § 25.55(c)(1)(B) is not applicable to IRR’s such as a wind resource correct?	No. While there are parts of 16 TAC § 25.55(c)(1)(B) that may not apply, there are parts that likely will apply. Please also see questions 43 and 46.
48) For the questions that require an answer of Yes or No, are we required to provide an answer if the question(s) are not applicable to the Generator?	Yes. All yes or no questions must be answered. Please also see questions 43 and 46.
49) 16 TAC § 25.55(c)(1)(E), question b - To clarify, is	Either the minimum design temperature or the minimum experienced operating temperature is required. ERCOT



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<p>PUCT/ERCOT looking for lowest ambient temperature the turbines experienced and were actually operating under or the lowest ambient temperature experienced at the site regardless of whether the turbines were operating or not?</p>	<p>interprets the minimum experienced operating temperature to be the lowest temperature at which the equipment was successfully operated.</p>
<p>50) How is a Good Cause Exception filed with the PUCT/ERCOT as it pertains to requirements under 25.55 that have not yet been completed by the time we file the WWRR by 12/1? Is it as simple as asking for a Good Cause Exception with explanations in the WWRR itself?</p>	<p>Yes. A good cause exception must be asserted and submitted as part of the generation entity's or TSP's WWRR. The process for requesting and obtaining a good cause exception is described in 16 TAC § 25.55(c)(6) and (f)(4).</p>
<p>51) Do we have to submit a Declaration of Completion of Generation Resource Winter Weatherization Preparations if we submit a WWRR by 12/1/21?</p>	<p>No. A generation entity that timely submits to ERCOT the winter weather readiness report required by 16 TAC § 25.55(c)(2) is exempt, for the 2021 calendar year, from the requirement to submit the noted Declaration.</p>