



## Winter 2022-23 Weather Emergency Preparedness FAQs

Question	Answer
1) What changes occurred since the winter of 2021-22?	The Public Utility Commission of Texas (PUCT) revised the Weather Emergency Preparedness rule (16 TAC § 25.55) implementing winter and summer weather preparedness standards. For winter 2022-2023, the rule requires generation entities (GEs) and transmission service providers (TSPs) to complete winter weather emergency preparation measures and submit a declaration of winter weather preparedness by 12/1/22.
2) Where can I find the new PUCT rule?	The text of the PUC's revised rule is 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 and maintain those measures throughout the winter season. Each TSP must complete the winter weather preparations described in the rule for its transmission facilities and maintain those measures throughout the winter season. GEs and TSPs must submit declarations of winter weather preparedness between November 1 and December 1.
4) What are the key regulatory milestones for a generation entity (GE) and TSP?	Implement the weather emergency preparation measures described in 16 TAC § 25.55(c)(1)(A) and § 25.55(f)(1)(A) before 12/1/22 and submit the declaration of preparedness by 12/1/22.
5) Do the winter season preparations required by 16 TAC § 25.55(c)(1)(B), (c)(1)(E), (f)(1)(B), and (f)(1)(E) prefaced with "Beginning in 2023" apply for winter 2022-2023?	No. The measures in those subsections must be completed by December 1, 2023.
6) How will GEs and TSPs receive the form for declarations of weather preparedness?	ERCOT will send a single declaration of weather preparedness Docusign envelope to the Account Representative (AR) of each GE or TSP. Additionally, ERCOT will post pre-populated Appendix A files to the market participant's specific "Request for Information" folder on the ERCOT MIS.
7) What should I do if I do not receive a declaration of preparedness form?	Notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:clientservices@ercot.com">clientservices@ercot.com</a> .
8) What should I do if I accidentally reject or lose the declaration of preparedness form?	Notify your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:clientservices@ercot.com">clientservices@ercot.com</a> .
9) What happens if a GE or TSP does not turn in the declaration to ERCOT by the required 12/1 deadline?	The GE or TSP will have violated the PUCT rule. ERCOT is required to file with the PUCT a compliance report addressing whether each TSP and GE has timely submitted the declaration.



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10) How do I respond to the declaration of preparedness form?	Market Participants must download the pre-populated files from the ERCOT MIS and fill-in the required information. You must attach the completed files prior to completing the DocuSign workflow. Additional guidance can be found at the <a href="https://ercot.com/gridinfo/generation/winterready">ERCOT.com/gridinfo/generation/winterready</a> site.
11) As a GE, must I submit a declaration of preparedness for each Resource or can I do it by fleet?	An GE can submit a single declaration of preparedness covering all of its Resources. The pre-populated declaration of preparedness received from ERCOT will list the resources registered to the GE. Specific information for each Resource can be loaded into one Appendix A spreadsheet and included with the declaration of preparedness that will be returned to ERCOT.
12) As a TSP, do I have to submit a declaration of preparedness for each substation and switchyard?	A TSP can submit a single declaration of preparedness covering all associated substations and switchyards per the network operations model. The pre-populated declaration of preparedness received from ERCOT will list the substations and switchyards. Specific information for each of them can be loaded into one Appendix A and included with the declaration of preparedness that will be returned to ERCOT.
13) 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 <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a> .
14) Who at my company must sign the notarized attestation in the declaration of preparedness?	The highest-ranking representative, official, or officer <i>with binding authority</i> over the GE or TSP.
15) What files must be attached to the DocuSign envelope?	The declaration of preparedness consists of a completed Appendix A, additional documents that you would like to attach, and the notarized attestation.
16) What are the size limitations to DocuSign attachments?	Each individual document must be <25 MB.
17) What is the maximum size of an entire DocuSign envelope?	Total size must be <100 MB.
18) Can I submit multiple attachments to the same question?	The DocuSign envelope will allow only one document to be submitted for the declaration of preparedness and only one document for the associated Appendix A. Additional files can be attached to the "Supplemental Documents" section.
19) 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 <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a> .
20) What if the Authorized Representative (AR) is sick or unavailable?	Please reach out to your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a> . Where necessary or convenient, the AR or BAR representing the GE or TSP can forward the DocuSign package to another person in the company to prepare and submit the declaration of winter



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21) Do I need a DocuSign account prior to receiving the declaration of preparedness form?	No. The account will be generated automatically using the email address of the AR and ERCOT sends the declaration of preparedness form.
22) Can good cause for non-compliance exception requests be submitted this year?	No. The revised PUC rule does not provide for good cause exceptions. ERCOT will provide market participants a reasonable period to cure any identified deficiencies.
23) How do I know if my facility will be inspected by ERCOT?	You will be notified by ERCOT at least 72 hours prior to the inspection. Instructions for the inspection(s) will be included in your notice.
24) How frequently will my Resource get selected for inspection?	ERCOT will inspect each generating resource at least once every three years.
25) How frequently will my Transmission substation or switchyard get selected for inspection?	ERCOT will consult with PUCT staff to select transmission substations and switchyards for inspection. A risk-based methodology will be developed to select substations or switchyards providing transmission service for inspection. At least 10% of the substations or switchyards will be inspected at least once every three years.
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. The PUCT rule requires ERCOT to treat that information as Protected Information.
28) How many facilities will be inspected?	We anticipate that ERCOT will inspect approximately 385-400 generation resources and 160-170 transmission substations or switchyards over the course of a year (including winter and summer).
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 an inspection before it occurs?	No. ERCOT currently sends invoices on a quarterly basis to all generation resources for a pro rata portion of the generation inspection costs. ERCOT sends a fixed fee individual inspection invoice to each TSP that has a facility inspected.
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 that number.
32) Will this inspection be remote or on-site?	For the time being, all inspections will be scheduled as on-site visits.



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33) How long will the inspection last?	Resource inspections generally last up to one full day on-site with the potential for follow up with remote or on-site visits if required. TSP inspections will generally be completed in less than one full day.
34) Is this a NERC inspection?	No. These inspections are pursuant to 16 Texas Administrative Code §25.55.
35) Who will be coming on-site for the inspections?	ERCOT has in-house weatherization and inspection staff but may also engage contractors to assist with inspections. ERCOT inspectors or our contractors may be accompanied by PUC staff.
36) When will the inspections occur?	Most inspections will occur during the winter season (December – February) or the summer season (June – September).
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 the requirements of the PUCT rule for the inspected site. ERCOT will treat the inspection reports as Protected Information.
38) What happens if my Resource or TSP facility has deficiencies identified through the inspection process?	ERCOT will provide a cure period to remedy each deficiency. The GE or TSP may request more time by providing documentation supporting that request. ERCOT, in consultation with PUCT staff, will determine a revised cure period and notify the GE or TSP.
39) What happens if my Resource or TSP facility cannot remedy a deficiency within the cure period?	ERCOT will report that fact to PUCT staff and the PUCT will decide whether to open an enforcement action.
40) What do we do if a Resource or substation has yet to complete winter preparedness activities by the declaration submission due date of 12/1?	Select the “Winter Weather Readiness Not Complete” option for that Resource or substation in the drop-down menu in the appropriate column in Appendix A and describe the deficiency and the date by which you will remedy it in the comments column for that row.
41) How do we verify the accuracy of our AR and Back-up Authorized Representative (BAR) contact records with ERCOT?	You should contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or ClientServices@ercot.com.
42) Will the ERCOT inspection personnel need to enter our substation control houses or resource control rooms?	The inspectors may need access to the substation control houses or resource control rooms so please prepare accordingly.
43) Do we need to use the declaration form prepared by ERCOT, or can we create one of our own and utilize it?	You must use the declaration form and Appendix A documents provided by ERCOT.



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<p>44) Who is responsible for completing and submitting the declaration if a Resource has multiple owners?</p>	<p>ERCOT will send the Master Resource Entity a prepopulated Appendix A. The PUCT rule (§ 25.55(c)(3)(A)(i)) indicates the declaration of preparedness should identify “every resource under the entity’s control for which the declaration is being submitted”.</p>
<p>45) Who is responsible for completing and submitting the declaration if a substation or switchyard has multiple owners?</p>	<p>Each TSP that owns or operates a transmission facility within the substation/switchyard in the ERCOT Network Operations Model will receive a prepopulated Appendix A. The PUCT rule (25.55(f)(3)(A)(i)) indicates the declaration of preparedness should identify “each transmission substation or switchyard maintained by the TSP for which the declaration is being submitted”.</p>
<p>46) I am a TSP and the Appendix A assigned to me was not prepopulated. What do I do?</p>	<p>Because you are registered as a TSP in the ERCOT Region, 16 Texas Administrative Code § 25.55(f)(3) requires you to complete a declaration of winter weather preparedness. As a courtesy, ERCOT prepopulated the Appendix A you received with transmission facilities in ERCOT’s model associated to your TSP.</p> <p>If a TSP has transmission facilities as defined in 16 Texas Administrative Code §25.55(b)(10) that don’t appear in Appendix A, you must add those facilities in Appendix A and provide the information required by the rule.</p> <p>If you have no transmission facilities as defined in the rule, you can leave Appendix A blank and add a note in the comment column in Appendix A indicating you do not own nor operate any transmission facilities.</p>
<p>47) I am the TSP for numerous substations on my Appendix A, some of which are maintained by others. How should I fill out Appendix A?</p>	<p>Because you are registered as the TSP for the substations/switchyards listed in the Appendix A you received, 16 Texas Administrative Code § 25.55(f)(3) requires you to file a declaration of winter weather preparedness for those facilities. Accordingly, you must gather the information necessary to complete Appendix A from all appropriate entities, including a summary of activities performed to comply with 16 TAC § 25.55, minimum ambient temperatures, <i>etc.</i> (set forth in §25.55(f)(3)(A)(ii) and (iii)). Once you gather that information, you should consolidate it into Appendix A and submit that single Appendix A with the other required parts of your declaration of winter weather preparedness and submit them in DocuSign per the instructions.</p>
<p>48) I am a GE with a mothballed Resource that may come into service and finish commissioning during the winter season. When should I submit a declaration of winter weather preparedness?</p>	<p>16 TAC § 25.55(c)(3)(C) requires submission of the declaration prior to returning the Resource to service during the winter season. Please submit the notarized declaration along with Appendix A for the affected unit(s) and any other supporting documents you wish to include to <a href="mailto:DeclarationofPreparedness@ercot.com">DeclarationofPreparedness@ercot.com</a>. The declaration form and a clean Appendix A can be found at <a href="http://ERCOT.com/gridinfo/generation/winterready">ERCOT.com/gridinfo/generation/winterready</a>.</p>





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<p>49) I am a GE with a Resource on a planned outage until mid-December. I plan to submit the declaration by 12/1 because all preparations will be complete. On column B of Attachment A, should I indicate the Resource is in a planned outage and resubmit the declaration prior to the Resource returning to service?</p>	<p>If the GE fully completed all appropriate winter weather preparation activities, you can leave column B of Appendix A blank (which means you completed all required activities) on your original declaration and fill out columns C and D as required. As long as the original declaration remains accurate, a second submission of the declaration is not necessary.</p>
<p>50) I am a GE with a Resource on a planned outage until mid-December. All winter weather preparation activities will not be complete by 12/1. On column B of Attachment A, should I indicate the unit is in a planned outage and subsequently submit a declaration prior to the Resource returning to service?</p>	<p>Yes, in your initial (12/1 or earlier) declaration, you should indicate the Resource is in an outage by using the drop-down menu in column B of Appendix A. After completing all the winter weather preparation activities required by the PUC rule prior to returning the Resource to service, you must submit a new declaration of winter weather preparedness for that Resource with column B blank and the other columns completed appropriately. See Question 48 for additional instructions.</p>
<p>51) I plan to submit a declaration of preparedness for a Resource that will come out of an outage during the winter season. How do I do so?</p>	<p>Download the declaration documents per Question #48 and submit to <a href="mailto:DeclarationofPreparedness@ercot.com">DeclarationofPreparedness@ercot.com</a> the notarized declaration along with a completed Appendix A and any other supporting documents you wish to include for the affected unit(s).</p>
<p>52) I am a GE with a new or repowered Resource that has not finished step 3 of the commissioning process and does not anticipate doing so this winter season. How should I fill out Appendix A for this resource?</p>	<p>You should select "Resource Has Not Completed Step 3 of Commissioning Process as of December 1" in the dropdown menu in column B for that Resource.</p> <p>If the actual commissioning date falls within the winter season, you must submit a declaration of winter weather preparedness before the Resource completes commissioning. See 48 for additional instructions.</p>
<p>53) I am a TSP with a substation/switchyard with no cold weather critical components that is otherwise prepared for winter. How should I fill out Appendix A?</p>	<p>The obligation to submit a declaration of winter weather preparedness exists regardless of whether you have cold weather critical components.</p> <p>You should leave column C of Appendix A blank and fill out columns D (minimum ambient temperature) &amp; E (summarizing the activities to complete the requirements of 16 TAC §25.55(f)(1)) as required. Column F may be used for any</p>



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	additional explanatory comments that you consider appropriate.
54) What do I do if I need to add additional lines to Appendix A?	Contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a> .
55) I need to add rows to my Appendix A spreadsheet but it is locked. What should I do?	An issue has been identified that prevents users from entering substation/switchyard identifying information on inserted rows. Please contact your ERCOT Account Manager or ERCOT Client Services at <a href="mailto:ClientServices@ercot.com">ClientServices@ercot.com</a> for <a href="#">password assistance</a> .
56) After I receive a notice of inspection, how do I contact ERCOT regarding inspection logistics?	For specific inspection related communications please email <a href="mailto:GenerationWeatherizationInspections@ercot.com">GenerationWeatherizationInspections@ercot.com</a> or <a href="mailto:TSPWeatherizationInspections@ercot.com">TSPWeatherizationInspections@ercot.com</a> .