



Winter '23-'24 Weather Emergency Preparedness FAQs

Question	Answer
1) What changes occurred since the winter of 2022- 23?	There were no further changes to the Weather Emergency Preparedness rule (16 TAC § 25.55). However, provisions § 25.55(c)(1)(B), (c)(1)(E), (f)(1)(B) and (f)(1)(E) are applicable for the first time in 2023.
2) Where can I find the new PUCT rule?	The text of the PUC's revised rule is at https://www.puc.texas.gov/agency/ruleslaws/subrules/elect/25.55/25.55.pdf .
3) What do I have to do for winter/summer season preparedness and by when?	<p>Each Generation Entity (GE) must complete the winter/summer weather emergency preparation measures described in § 25.55(c)(1) / § 25.55(c)(2) of the rule for each Resource under its control, maintain those measures throughout the winter/summer season and complete any on-going or monthly requirements.</p> <p>Each Transmission Service Provider (TSP) must complete the winter/summer weather preparations described in § 25.55(f)(1) / § 25.55(f)(2) of the rule for its transmission facilities, maintain those measures throughout the winter/summer season and complete any on-going, monthly, or regular requirements at the appropriate time.</p> <p>GEs and TSPs must complete the winter measures by December 1 and submit declarations of winter weather preparedness between November 1 and December 1. <i>See</i>, § 25.55(c)(3)(A) and (f)(3)(A).</p> <p>GEs and TSPs must complete the summer measures by June 1 and submit declarations of summer weather preparedness between May 1 and June 1. <i>See</i>, § 25.55(c)(3)(B) and (f)(3)(B).</p>
4) What do I have to do regarding Weather critical components for a GE and TSP?	GEs and TSPs should refer to §§ 25.55(c)(1)(E), 25.55(c)(2)(E) and 25.55(f)(1)(E), 25.55(f)(2)(E), respectively, which require creating lists of cold / hot weather critical components and updating the lists as needed. ERCOT will request copies of those lists and, starting in 2024, evidence of review/update when it performs inspections pursuant to §§ 25.55(d) and (g).
5) Do the summer and winter season preparations starting with "Beginning in 2023" apply for summer and winter 2023 and, if so, by when must they be completed?	Yes. The measures in those subsections must be completed by June 1, 2023 for summer and December 1, 2023 for winter.



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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. ERCOT will post pre-populated Appendix A files to the market participant's specific "Request for Information" folder on the ERCOT MIS. ERCOT will, for thermal resources for summer only, also post Section 22 Attachment K and a pre-populated supplement (spreadsheet) to Attachment K 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 clientservices@ercot.com .
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 clientservices@ercot.com .
9) What happens if a GE or TSP does not turn in the declaration to ERCOT by the required December 1 / June 1 deadline?	The GE or TSP will have violated the PUCT rule. ERCOT must file with the PUCT a compliance report addressing whether each TSP and GE timely submitted a declaration.
10) How do I respond to the declaration of preparedness form?	Download the pre-populated files from the ERCOT MIS and fill-in the required information. You must attach the completed files prior to finishing the DocuSign workflow. Additional guidance can be found at the https://www.ercot.com/gridinfo/generation/winterready and https://www.ercot.com/gridinfo/generation/summerready sites.
11) As a GE, must I submit a declaration of preparedness for each generation resource or can I do it by fleet?	While a GE can submit a single <i>declaration of preparedness</i> covering all its Resources, it must list the activities performed for <i>each</i> Resource in Appendix A. As a courtesy, ERCOT will prepopulate the Appendix A provided in the MIS with a list of Resources associated with a GE in the ERCOT model. However, the GE must ensure all information in Appendix A is correct. You must load specific information for each Resource into one Appendix A spreadsheet and include it with the declaration of preparedness you return to ERCOT. Attachments describing the activities specifically executed for each Resource may be submitted together with Appendix A. Such documents must be referenced in the "Activities to Complete the Requirements of 16 TAC §25.55(c)(1)" column (for winter) or "Activities to Complete the Requirements of 16 TAC §25.55(c)(2)" column (for summer) of Appendix A.



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<p>12) Why is there a natural gas attestation attached to my generation resource summer declaration of weather preparedness?</p>	<p>Section 25.55(c)(3)(B)(iv) requires GEs to include with its declaration, “any additional information required by the ERCOT protocols in effect as of April 1 of the year in which the declaration is submitted.” The ERCOT Protocols (§ 3.21(1)) require GEs with at least one resource using natural gas as the primary fuel to complete the declaration in Protocols Section 22, Attachment K. Therefore, if you have a generation resource that uses natural gas, you must submit Attachment K and its supplement with your summer declaration of weather preparedness.</p>
<p>13) As a TSP, do I have to submit a declaration of preparedness for each substation and switchyard?</p>	<p>While a TSP can submit a single <i>declaration of preparedness</i> covering all substations and switchyards assigned to it in the ERCOT network operations model, it must list the activities performed for <i>each</i> substation and switchyard it maintains. As a courtesy, ERCOT will prepopulate the Appendix A provided in the MIS with a list of the substations and switchyards associated with a TSP in the ERCOT model. However, the TSP must ensure all information in Appendix A is correct. You must include specific information for each substation and switchyard in one Appendix A and provide it with the declaration of preparedness you return to ERCOT. Attachments describing the activities specifically executed for each substation/switchyard may be submitted together with Appendix A. Such documents must be referenced in the “Activities to Complete the Requirements of 16 TAC §25.55(f)(1)” column (for winter) or “Activities to Complete the Requirements of 16 TAC §25.55(f)(2)” column (for summer) of Appendix A.</p>
<p>14) If I have additional questions, who can I talk to?</p>	<p>Contact your ERCOT Account Manager or the ERCOT Client Services group at 512-248-3900 or ClientServices@ercot.com.</p>
<p>15) Who must sign the attestation for the declaration of preparedness?</p>	<p>The highest-ranking representative, official, or officer <i>with binding authority</i> over the GE or TSP. Additionally, the attestation <i>must be notarized</i>.</p>
<p>16) What files must be attached to the DocuSign envelope?</p>	<p>(i) The declaration of preparedness, including a completed Appendix A, (ii) additional documents you would like to attach, and (iii) the notarized attestation. For summer only, GEs with thermal resources must also provide Attachment K and its supplement.</p>
<p>17) What are the size limitations to DocuSign attachments?</p>	<p>Each individual document must be <25 MB.</p>



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18) What is the maximum size of an entire DocuSign envelope?	Total size must be <100 MB.
19) Can I submit multiple attachments for the same question?	The DocuSign envelope will allow only one document for the declaration of preparedness and one document for the associated Appendix A. You can provide additional files in the "Supplemental Documents" section of DocuSign.
20) What should I do if there is something wrong with the DocuSign information?	Contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or ClientServices@ercot.com.
21) What if the Authorized Representative (AR) is sick or unavailable?	<p>Please contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or ClientServices@ercot.com.</p> <p>The deadline for submitting declarations is established by PUC Rule. ERCOT has no authority to change the deadline so you should plan accordingly.</p> <p>Your company's AR or Back-up AR (BAR) can forward the DocuSign package to another person in your company to prepare and submit the declaration of summer weather preparedness.</p>
22) Do I need a DocuSign account prior to receiving the declaration of preparedness form?	No. DocuSign will generate an account automatically using the AR's email address when ERCOT sends the declaration of preparedness form.
23) How do I know if ERCOT will inspect my facility?	ERCOT will notify your AR at least 72 hours prior to the inspection. Instructions for the inspection(s) will be included in your notice. Please note, you have 24-hours to respond to the 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 and use a risk-based methodology to select transmission substations and switchyards 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.



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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) What should I do if we have an unplanned emergency and can't facilitate the inspection and need to reschedule?	Contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900.
29) Do we have to pay for an inspection before it occurs?	No. ERCOT currently sends invoices on a semi-annual basis to GEs for a pro rata portion of the generation inspection costs. ERCOT sends a fixed fee inspection invoice to each TSP that has a facility inspected.
30) 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.
31) Will this inspection be remote or on-site?	For the time being, all inspections will be scheduled as on-site visits.
32) 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.
33) Is this a NERC inspection?	No. These inspections are pursuant to 16 Texas Administrative Code § 25.55.
34) 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. PUC staff may accompany ERCOT inspectors or contractors.
35) When will the inspections occur?	Most inspections will occur during the winter season (December – February) or the summer season (June – September).
36) What content will be in the inspection reports and who will see them?	Inspection reports will address whether the 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. ERCOT has presented the actual questions in the checklist during weatherization workshops. Those presentations can be found at the https://www.ercot.com/gridinfo/generation/winterready or https://www.ercot.com/gridinfo/generation/summerready sites.



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37) 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.
38) 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 how to proceed.
39) What do we do if a Resource or substation has yet to complete summer preparedness activities by the deadline to submit the declaration?	Select the “Summer 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.
40) How do we verify the accuracy of our AR and BAR contact records with ERCOT?	Contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or ClientServices@ercot.com .
41) 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 house or resource control room so please prepare accordingly.
42) 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 ERCOT-provided declaration form and Appendix A document. In summer, for gas-fired generation resources, you must also use Attachment K and its supplemental spreadsheet as provided by ERCOT.
43) Who is responsible for completing and submitting the declaration if a Resource has multiple owners?	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.”
44) Who is responsible for completing and submitting the declaration if a substation or switchyard has multiple owners?	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.”
45) I am a TSP and the Appendix A assigned to me was not prepopulated. What do I do?	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 preparedness. As a courtesy, ERCOT

	<p>prepopulates Appendix A 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 do not appear in Appendix A, you must add those facilities in Appendix A and provide the information required by the PUCT rule.</p> <p>If you have no transmission facilities as defined in the rule, you can leave column B of Appendix A blank and add a note in the comment column in Appendix A indicating you do not own or operate any transmission facilities and provide the name of the entity that maintains those facilities.</p>
<p>46) I am the TSP for numerous substations on my Appendix A, some of which are maintained by others. How should I complete Appendix A?</p>	<p>ERCOT will pre-populate Appendix A with all transmission substations / switchyards associated with your company in the ERCOT network model. You must provide the information requested on Appendix A. If your company does not perform the weather preparedness activities for a particular substation / switchyard, select “Another Entity Performs the Required Weatherization Activities for this Substation (Identify Responsible Entity in Comments Field)” in column D and identify the company that <i>does</i> perform those activities in the “Comments” column (I).</p>
<p>47) I am a GE with a mothballed Resource that may come into service and finish commissioning during the winter/summer season. When should I submit a declaration of winter/summer weather preparedness?</p>	<p>16 TAC § 25.55(c)(3)(C) requires you to submit the declaration prior to returning the Resource to service during the winter/summer season. Please submit to DeclarationofPreparedness@ercot.com the notarized declaration along with Appendix A for the affected unit(s) and any other supporting documents you wish to include. After December 1 or June 1, you can find a blank declaration form and a clean Appendix A at https://www.ercot.com/gridinfo/generation/winterready or https://www.ercot.com/gridinfo/generation/summerready.</p>
<p>48) I am a GE with a Resource on a planned outage until mid-June/December. I plan to submit the declaration by June 1 / December 1 because all preparations will be complete. On column C 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 your company fully completed all summer weather preparation activities, you can leave column C of Appendix A blank (which means you completed all required activities) on your original declaration and fill out the Activities . . . and Comments columns, as required. As long as the original declaration remains accurate, you need not submit a second declaration.</p>

<p>49) I am a GE with a Resource on a planned outage until mid-June/December. All weather preparation activities will not be complete by June 1 / December 1. On column D 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 declaration (submitted by June 1 / December 1), you should indicate the Resource is in outage by using the drop-down menu in column C of Appendix A. After completing all summer / winter weather preparation activities prior to returning the Resource to service, submit a new declaration of weather preparedness for that Resource with column C blank and the other columns completed appropriately. See Question 47 for additional instructions.</p>
<p>50) I plan to submit a declaration of preparedness for a Resource that will come out of an outage during the winter/summer season. How do I do so?</p>	<p>Download the declaration documents and submit to DeclarationofPreparedness@ercot.com the notarized declaration along with a completed Appendix A (and, if summer, Attachment K and its supplement) and any other supporting documents you wish to include for the affected Resource(s).</p>
<p>51) 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/summer 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 June 1” in the dropdown menu in column C for that Resource. If the actual commissioning date falls within the winter/summer season, you must submit a declaration of weather preparedness <i>before</i> the Resource completes commissioning. See 47 for additional instructions.</p>
<p>52) I am a TSP with a substation/ switchyard with no hot/cold weather critical components that is otherwise prepared for summer/winter. How should I fill out Appendix A?</p>	<p>The obligation to submit a declaration of weather preparedness exists regardless of whether you have hot/cold weather critical components.</p> <p>You should leave column D of Appendix A blank and complete all other columns, as required. You may use the comments column for explanatory comments you consider appropriate.</p>
<p>53) What do I do if I need to add additional lines to Appendix A?</p>	<p>You may insert new rows in Appendix A by right-clicking on the row and selecting “Insert”.</p>
<p>54) Can we modify Appendix A or the supplement to Attachment K?</p>	<p>The only authorized modification to these ERCOT provided documents is adding new rows. Other modifications will result in ERCOT rejecting the document and requiring resubmittal.</p>
<p>55) After I receive a notice of inspection, how do I contact ERCOT regarding inspection logistics?</p>	<p>For specific inspection related communications please email GenerationWeatherizationInspections@ercot.com or TSPWeatherizationInspections@ercot.com.</p>
<p>56) Our facility underwent an inspection in the Winter of 2022-23. Does this mean we won't get a notice of inspection for several seasons?</p>	<p>No. Any facility may be inspected regardless of when previous inspections occurred.</p>

<p>57) Some of our facilities only have 69kV transformers (on the high side). Does this mean those facilities are exempt from inspection per 16 TAC §25.55?</p>	<p>No. In accordance with Section 2 of the Nodal Protocol Provisions, Transmission Facilities are defined as follows:</p> <ol style="list-style-type: none"> 1) Power lines, substations, and associated facilities operated at 60 kV or above, including radial lines operated at or above 60 kV. 2) Substation facilities on the high voltage side of the transformer, in a substation where power is transformed from a voltage higher than 60 kV to a voltage lower than 60 kV or is transformed from a voltage lower than 60 kV to a voltage higher than 60 kV 3) The direct current interconnections between ERCOT and the Southwest Power Pool or Comision Federal de Electricidad (CFE). <p>Thus, the rule applies to any switchyard or substation with any Transmission facility operated at or above 60 kV.</p>
<p>58) Who is responsible for ensuring the AR and the BAR information is up to date to receive a Notice of Inspection?</p>	<p>Every ERCOT-registered market participant must ensure the AR and BAR information is accurate and current. Contact your ERCOT Account Manager or ERCOT Client Services at (512) 248-3900 or clientservices@ercot.com with any changes.</p>
<p>59) How long do we have to respond to a Notice of Inspection?</p>	<p>You must furnish ERCOT personnel with all necessary information for facility access within twenty-four hours upon receipt of a notice of inspection.</p>
<p>60) Do we need to maintain records for the seasons where we do not get inspected?</p>	<p>Yes. Entities must maintain compliance records for all seasons, regardless of when an inspection occurs. You should implement a record-keeping system that ensures compliance with these requirements.</p>
<p>61) Where can we get a copy of the GE or the TSP summer/winter inspection checklist?</p>	<p>PowerPoint documents containing the summer/winter inspection checklists for GEs and TSPs can be found on https://www.ercot.com/gridinfo/generation/summerready or at https://www.ercot.com/gridinfo/generation/winterready.</p>
<p>62) Is it appropriate to have written or verbal responses ready for the inspection checklists for our site-specific resources, substation, or switchyard?</p>	<p>Yes. ERCOT strongly encourages you to prepare for the inspections. Ensuring the availability of well-prepared written or verbal responses to checklist items and pertinent site-specific documentation (e.g., resource-specific or substation maintenance work order records, plans, operator rounds checklists, etc.) facilitates a smooth and effective inspection process.</p>
<p>63) Do we get the inspection report at the end of the day of the inspection?</p>	<p>No. ERCOT will prepare and review it prior to making it accessible to the GE or TSP and the PUCT. Nevertheless, the inspector may convey his/her initial opinion on compliance deficiencies. If cure periods will be necessary, an initial discussion regarding a path or timeline to full compliance may occur.</p>

<p>64) Do I need to create a list of all hot/cold weather critical components for the upcoming summer/winter season?</p>	<p>Yes. Each GE and TSP must create a list of critical hot/cold weather components for each specific generation resource or substation / switchyard. In addition, you must review the list at least annually before the beginning of the summer/winter season and update the list as necessary.</p>
<p>65) In the case that the historical maximum operating temp for our resource exceeded our design temp, would it be acceptable to default to our design temp?</p>	<p>No. 16 TAC § 25.55(c)(2)(B) requires preparing for the greater of the maximum ambient temperature at which the resource has experienced sustained operations or the 95th percentile maximum average 72-hour temperature reported in ERCOT’s historical weather study . . . for the weatherization zone in which the resource is located.</p>
<p>66) Where can we find the 95th percentile maximum average 72-hour temperatures for the various weather zones?</p>	<p>They are in Table 67 of the ERCOT Historical Weather Study which can be found at https://interchange.puc.texas.gov/search_under_project_52691.</p>
<p>67) Where can we find the 95th percentile minimum average 72-hour Wind Chill values for the various weather zones?</p>	<p>They are in Table 72 of the ERCOT Historical Weather Study, which can be found at https://interchange.puc.texas.gov/search_under_project_52691.</p>
<p>68) Where can we find the map of the various weather zones from the ERCOT Historical Weather Study?</p>	<p>The ZIP file on the PUC Interchange with the Weather Study has that information. Attachment C - County to Weather Zone Mapping is an Excel file mapping various Texas counties to the weather zones used in the study.</p>
<p>69) For the summer/winter weatherization personnel training, does it need to occur each year?</p>	<p>Yes, training must occur by June 1 for summer and by December 1 for winter each year.</p>
<p>70) For new generation, when would we need to provide a Summer and/or Winter Declaration of Preparedness?</p>	<p>The declaration of preparedness must be submitted prior to the commissioning date established in the ERCOT interconnection process.</p>
<p>71) For those in hurricane zones, do we understand correctly that this ruling does not apply to hurricane preparedness?</p>	<p>Yes, 16 TAC § 25.55 contains Winter and Summer season preparation requirements but no requirements specific to hurricanes.</p>
<p>72) Can we reach out to ERCOT for a legal interpretation of 16 TAC §25.55?</p>	<p>ERCOT is not responsible for legal interpretation of the rule, please consult with your legal department.</p>
<p>73) What should market participants do to prepare facilities adequately for winter?</p>	<p>Each market participant must implement weather emergency preparation measures meeting the rule requirements in 16 TAC § 25.55(c)(1) or (f)(1) including the “Beginning in 2023” requirements.</p>
<p>74) If market participants cannot determine their design basis cold temperature and/or design basis wind speed, can they use operational data to demonstrate compliance with the wind chill value requirement?</p>	<p>Yes, operational data that demonstrates sustained operation at conditions at or below the 95th percentile minimum average 72-hour Wind Chill value for their weather zone would reasonably be expected to do so again, <i>provided that</i> all preparation measures are in place and well-maintained.</p>
<p>75) Will the Weather Emergency Preparedness Rule be revised once</p>	<p>Only the Commission can open the Rule for revision. The PUC Rule is broader in scope than the NERC Standards and covers winter and summer conditions for generation resources and</p>



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the NERC extreme cold weather standards are finalized?	TSP facilities while the NERC Standards cover only winter conditions for generation resources.
76) Is it considered a “weather-related” failure if the failure does not involve a hot/cold weather critical component?	If a weather-related failure occurs on a component not identified as a hot/cold weather critical component, it would still be covered by the Rule.