

INTRODUCTION

Joe J. Trevino Jr.

- CPS Energy – 18 years
- Manager Reliability & Protocols Compliance
 - 1 year in current role
- 17 years in Power Generation
 - Supported O&P Compliance 15 years
 - Electrical Engineer
 - Various SME and Technical Leadership Roles





SEASONAL WEATHER PREPAREDNESS PROGRAM

PRESENTED BY:
Joe J. Trevino Jr.
Manager Reliability & Protocols Compliance

10/16/2025
Informational Update

AGENDA

- Compliance Organization
- Internal Controls
- Program Samples
- Key Points



Figure 1: Solar Array

- Corporate Compliance (O&P)
 - O&P, CIP, Gas Compliance Teams
 - Provide support, oversight and manage tracking/reminder tool
 - Track activities at the PUCT rule level
 - Serve as liaison between CPS Energy and ERCOT as needed
- Business Unit (Energy Delivery) Compliance
 - Track activities at the component level
 - Subject Matter Experts and stakeholders perform tasks
 - Leadership provides oversight and support of tasks
 - Interface with ERCOT and Corporate Compliance

CPS Energy has multiple layers of compliance oversight which include a Corporate level, Business unit level, as well as SME's and stakeholders.
GOAL: Prepare, Maintain, and Operate a safe reliable system.

Transmission Service Provider

- Provide training for relevant personnel that perform weather preparedness tasks.
- Annual Training provided using internal Learning Management System and Instructor-Led Training.
- Maintain training records for employees who perform weather preparedness inspections in LMS and hard copy.
- Corporate Compliance has a reoccurring CMO task to reach out to the Business Unit to track progress and completion of required training for Weather Preparedness.
- Separate tasks for winter and summer season.
- Lessons learned from events, preparations, and ERCOT Inspections.

Business Unit ensures all relevant employees are trained to perform tasks required to comply with Seasonal Weather Preparedness.

INTERNAL CONTROLS

HOW WE TRACK WEATHER PREP ACTIVITIES

CASCADE

- Maintenance Management system.
- Managed by Business Unit.
- Work orders are generated and records maintained in CASCADE.
- Work completed by two teams in the Business Unit.
- Tracking work at the component level.

CMO

- Email reminder system.
- Escalations for overdue due dates.
- Supported by Corporate Compliance Team.
- CMO Tasks are assigned to Compliance Team for oversight and tracking work.
- Track how TSP complies with PUCT Rule 25.55.
- System is designed by rule section.
- Used as a reminder for work to be completed, not a work order.

CASCADE SYSTEM SAMPLES

MAINTENANCE MANAGEMENT SYSTEM



Location:	Equip Type: PowerTransformer
Equip #:	Manufacturer:
Equip Position:	Model:
Serial #:	Mfg Date:
Reading Type: NERC Power Transformer Patrol	

Page	Reading	Value
NERC PWR TRN Annual		
	Grounding Condition OK ?	y
	Control Cabinet Heaters	Functional
	Mechanism Condition OK ?	Yes
	Winding Temp	62
	Liquid Temp	60
	Fan Bank 1 status	off
	Fan Bank 2 status	off
	Manually Run Bank1 Cooling	OK
	Verify Bank 1 operational	y
	Manually Run Bank2 Cooling	OK
	Verify Bank 2 operational	y
	Put Fans back in Auto	y
	Check Oil Pump Condition	NA
	LTC Tap position (-16, N, 16)	-6

Location:	Equip Type: SF6Breaker
Equip #:	Manufacturer:
Equip Position:	Model:
Serial #:	Mfg Date:
Reading Type: NERC SF6 Breaker Annual	

Page	Reading	Value
NERC SF6 Annual		
	Grounding Condition OK ?	y
	Control Cabinet Heaters	Functional
	Counter	62
	Mechanism Condition OK ?	Yes
	SF6 Pressure Condition ?	Normal

Internally, regulatory items are typically labeled as NERC, however these cover PUCT Rule 25.55.

CMO SYSTEM SAMPLES

TASK REMINDER SYSTEM – REPORT EXPORT

- Tasks linked to PUCT 25.55 rules

ID	Org Unit	Entity	Task Category	Task
25.55 (f)-14729	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 28 Day Reminder	25.55 (f)(1)(C) Review the adequacy of staffing plans to be used during a winter weather emergency and revise the staffing plans, as appropriate. (Verify this has been complete)
25.55 (f)-14751	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 28 Day Reminder	25.55 (f)(1)(D) - Train relevant operational personnel on winter weather preparations and operations. (Verify this is on track)
25.55 (f)-14693	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 28 Day Reminder	25.55 (f)(1)(E) - Review the list of all cold weather critical components, at least annually prior to the beginning of the winter season, and update the list as necessary. (Verify this is complete)
25.55 (f)-15592	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 28 Day Reminder	25.55(f) (3) A TSP must submit to ERCOT, on a form prescribed by ERCOT, declarations of weather preparedness.

- Internal tasks

ID	Org Unit	Entity	Task Category	Task
25.55 (f)-11336	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 5 Day Reminder	\$ 25.55 - TSP- Please remit payment for the Weatherization Inspection fee invoices.
25.55 (g)-15881	Reliability & Protocols Compliance (77000950)	Reliability & Protocols Compliance (77000950)	NERC 5 Day Reminder	ERCOT Weatherization Inspection at CALAVERAS - WO0013402

Individual tasks are due ahead of the due date for Declaration of Weather Preparedness.

CMO SYSTEM SAMPLES

TASK REMINDER SYSTEM – DASHBOARD



Standard Name	Ref ↓	Reference	Requirement Applicability	Description	Measures	Violation Risk Factors	Risk	CFR Wording	Tasks	ID
PUCT Chapter 25.55. Weather Emergency Preparedness	25.55(c)			25.55(c) Weather emergency preparedness reliability standards for a generation entity					34 (Complete) 7 (Pending) 7 (Request Extension)	
PUCT Chapter 25.55. Weather Emergency Preparedness	25.55(d)			25.55(d) ERCOT inspection of resources.					11 (Complete)	
PUCT Chapter 25.55. Weather Emergency Preparedness	25.55(f)			25.55(f) Weather emergency preparedness reliability standards for a TSP					20 (Complete) 7 (Pending) 7 (Request Extension)	
PUCT Chapter 25.55. Weather Emergency Preparedness	25.55(g)			25.55(g) ERCOT inspections of transmission facilities.					34 (Complete)	

Task

25.55 (c)(1)(E) Review the list of all cold weather critical components annually prior to the beginning of the winter season and update the list as necessary. (Verify this is complete)

Details

Print

Edit

Org Unit:

Reliability & Protocols Compliance (77000950)

Entity:

Reliability & Protocols Compliance (77000950)

Task Category:

NERC 28 Day Reminder

Responsible:

Previous Responsible:

Progress:

0%

Confidential:

No

Task Inherent Risk:

Assignor:

15 Oct 2024 (by)

Due Date:

07 Oct 2025

Schedule:

Recurrence Pattern: Every 1 year(s) on the First Tuesday of October
Range of Recurrence: Start 09 May 2023, No end date
Create next entry upon completion of the previous
Notification Settings: Disabled

Task Status:

Pending

Compliance Status:

Not Applicable

A reminder notification is sent via email to the "responsible" person 28 days before the due date, then every 7 days.

When the task is complete, another task is generated for the following

Requirements

Add Requirement

Remove Requirement

ID	Standard Name	Description	Last
☐	3350 PUCT Chapter 25.55. Weather Emergency Preparedness	25.55(c) Weather emergency preparedness reliability standards for a generation entity	

TSP COMPLIANCE

KEY POINTS

- Focus on **PUCT 25.55 Rule**, NERC EOP-011, ERCOT Rules
- Tracking tools (technology) for compliance at multiple levels
- Thorough annual training for relevant employees
- Close management of employee transitions
- Detailed records of training and maintenance
- Close collaboration with Business Unit and Corporate Compliance

KEY BENEFITS

- Ensure high visibility for appropriate stakeholders and leadership
- Leveraging technology and programs for success
- Defined accountability
- Reduces probability of compliance deficiencies



Figure 2: Substation



Figure 3: Bus & Breaker



THANK YOU