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Getting Started with Weatherization & Inspection Compliance in ERCOT

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Matt Holland, Supervisor, Weatherization Inspections

October 29, 2026

Agenda:

- Part 1: Overview of the ERCOT W&I Program
  - PUCT Weather Emergency Preparedness Rule, 16 TAC §25.55
  - Weatherization & Inspection Market Participant Portal
  - Process for Submitting a Declaration of Weather Preparedness
  - Helpful W&I Resources
- Part 2: ERCOT W&I Inspection Process
  - Notice of Inspection (NOI)
  - Best Practices for Preparing for an Inspection
  - Inspection Compliance Deficiencies
  - Inspection Results

Introductions

ERCOT Weatherization and Inspection (W&I) Department

Staff	Title
David Kezell	Director of Weatherization and Inspection
Cyle Lublin	Weatherization Field Services Analyst Lead
Godswill Peter	Weatherization & Inspection Analyst
Sheri Messer	Weatherization & Inspection Analyst
<u>Supervisors, Weatherization Inspections</u> Kevin Harris Matt Holland <u>Weatherization Inspectors</u> Albert Cantu Audie Proctor Chris Thomas Dennis Horton Jake Jacobs Neil Quast Todd Mullen ERCOT Contractors	<u>Weatherization Zone</u> South Region North Region West, South, Valley Panhandle, North, North Central, East North Central, West West, Far West West, South Central, Coast East, Coast Coast All regions

What is the Weather Emergency Preparedness Rule?

In response to extreme weather events, Senate Bill 3 (87th Texas Legislature, 2021) required the PUCT to establish a weather emergency preparedness rule.

- The PUCT adopted the Weather Emergency Preparedness Rule, 16 Texas Administrative Code (TAC) §25.55 in October 2021.

Purpose of weatherization requirements:

- Ensure grid reliability during extreme cold and heat.
- Prevent weather-related outages caused by critical equipment failures.

- The rule applies to the Electric Reliability Council of Texas, Inc. (ERCOT), Generation Entities (GE), and Transmission Service Providers (TSP) in the ERCOT power region per 16 TAC §25.55(a).
- The rule was implemented in two phases:
  - Phase 1 (2021): winter weather preparedness.
  - Phase 2 (2022): expanded to summer weather preparedness and added and revised other requirements.
- Additionally, as of 2023, the rule establishes:
  - weather zone specific hot and cold conditions at which a Market Participant (MP) must implement measures reasonably expected to ensure sustained operations; and
  - that MPs create hot and cold weather critical component (HWCC/CWCC) lists.
- The ERCOT W&I team began inspections December 2021.

What are the weather zone specific hot and cold conditions?

Winter requirement: implement measures reasonably expected to ensure sustained operations at the 95th percentile minimum average 72-hour wind chill temperature reported in ERCOT's historical weather study (Table 72).

Weather Zone	95th Percentile Minimum Average 72-Hour Wind Chill
North	-5.0°
North Central	-0.5°
West	0.3°
Far West	1.3°
East	4.4°
Coast	18.1°
South Central	8.4°
Southern	16.3°
Valley	20.0°
Panhandle	-17.6°

Summer requirement: implement measures reasonably expected to ensure sustained operations at the greater of the maximum ambient temperature at which the facility has experienced sustained operations or the 95th percentile maximum average 72-hour temperature reported in ERCOT's historical weather study (Table 67).

Weather Zone	95th Percentile Maximum Average 72-Hour Temperature
North	96.1°
North Central	95.4°
West	92.9°
Far West	92.7°
East	91.6°
Coast	90.1°
South Central	92.3°
Southern	88.9°
Valley	88.6°
Panhandle	90.3°

ERCOT Historical Weather Study (Version 1.1, 2022)

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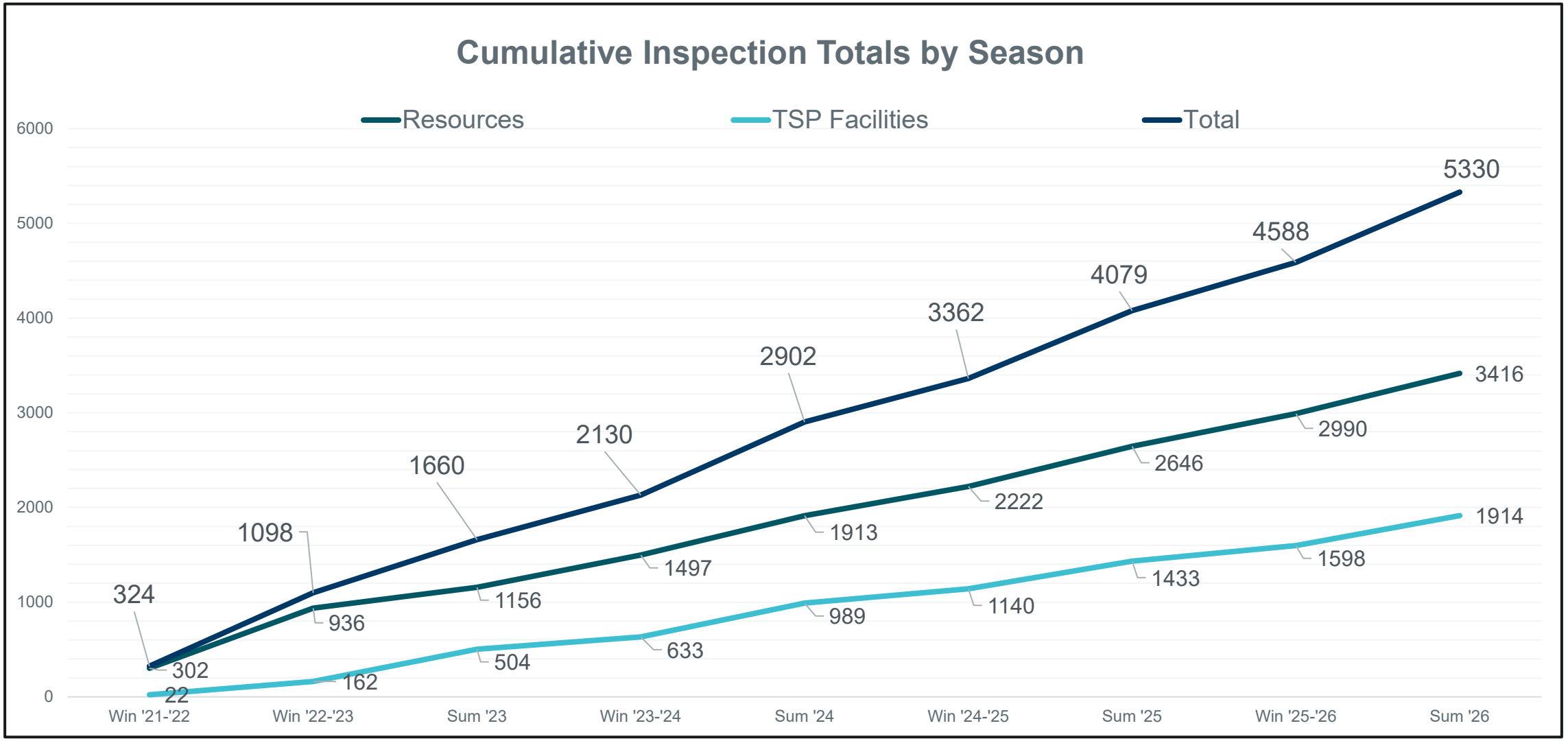
What is ERCOT's role in administering the rule?

Per 16 TAC §25.55, ERCOT must:

- file with the commission, no later than June 20 and December 20 of each year, a compliance report that addresses whether each GE and TSP has submitted the declaration of summer and winter weather preparedness for each resource or substation/switchyard under the GE or TSP control;
- develop, in consultation with commission staff, a summer and winter weather inspection checklist for use during inspections;
- conduct inspections of resources and transmission facilities;
- provide a written report on its inspection of a resource or transmission system or facility to the GE or TSP;
- determine, in consultation with commission staff, the number, extent, and content of inspections, provided that every resource interconnected to the ERCOT power region, and at least ten percent of substations or switchyards providing transmission service, must be inspected at least once every three years;
- provide each GE and TSP at least 72 hours' written notice of an inspection unless otherwise agreed by the GE or TSP and ERCOT;
- provide the GE and TSP a reasonable period to cure identified deficiencies;
- report to commission staff any GE or TSP that does not remedy identified deficiencies within the cure period determined by ERCOT;
- subsequent to a weather emergency, notify a GE or TSP of their repeated or major weather-related forced interruption of service;
- study historical weather data across each weather zone classified in the ERCOT protocols and file with the commission a report summarizing the results of the study at least once every five years.

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How many inspections have been conducted since the program began?



How Do Market Participants Interact with ERCOT throughout the W&I Process?

Weatherization & Inspection Market Participant Portal

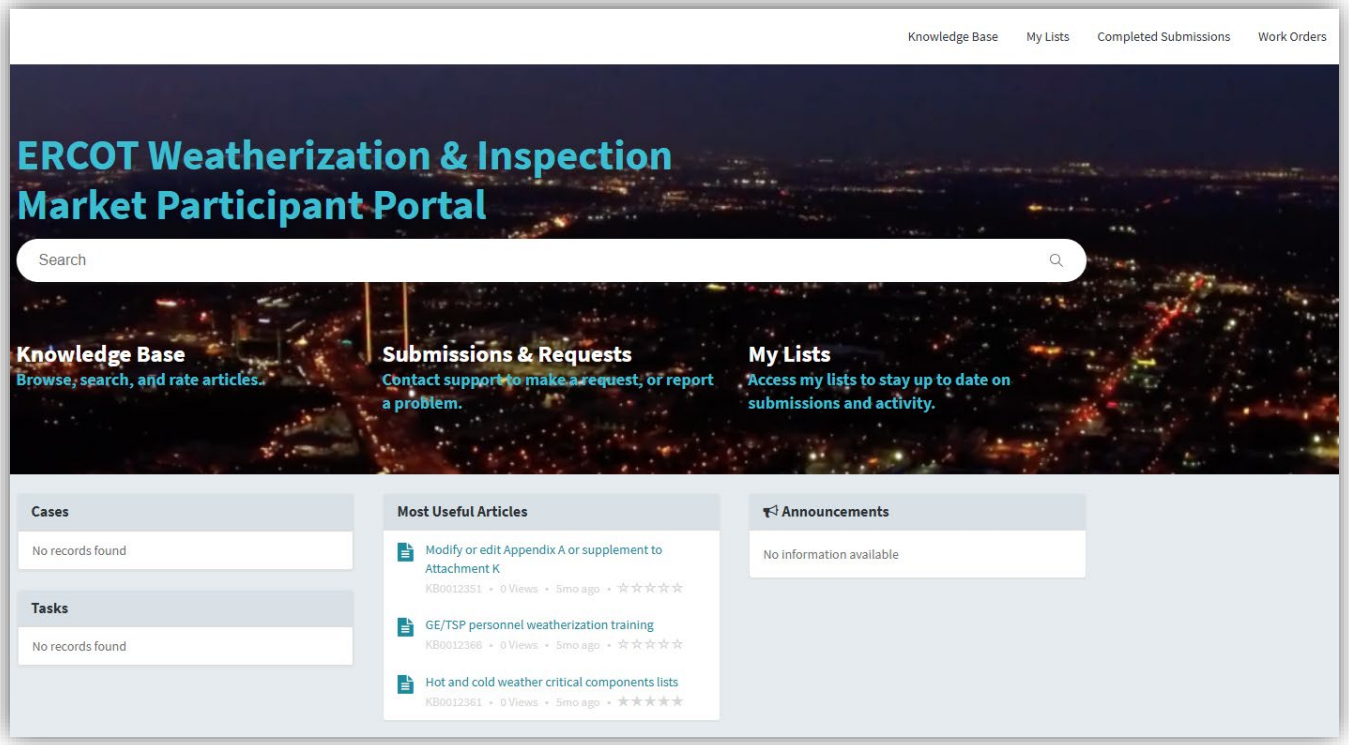
The portal is a secure online platform that serves as the hub for managing weatherization communication and compliance requirements.

Centralized Communication
MPs and W&I staff communicate using weatherization support requests (wSUP).

Submission Center
MPs submit summer and winter Declaration of Weather Preparedness (DoWP) documents, including Appendix A, the Notarized Attestation, and optional supplemental documents.

Inspection Management
Inspections are scheduled, communicated via a Notice of Inspection (NOI), and documented through work orders on the portal. MPs and inspectors communicate and share documents, including the final inspection report, directly in the inspection work order.

Deficiency Tracking
MPs with an identified compliance deficiency and cure period are assigned a cure period task (CPT) in the work order. Progress is communicated and monitored through the CPT until the issue is remedied.



Who has access to the portal?

- The portal is accessible through the ERCOT Market Information System (MIS) at https://mis.ercot.com/secure/applications.

- To access the portal, an MP User Security Administrator (USA) must provision an MP representative with a digital certificate with **one** of the following roles:

SN_M_W_MGR_ECEII – for managers with **authority to submit** on behalf of the entity

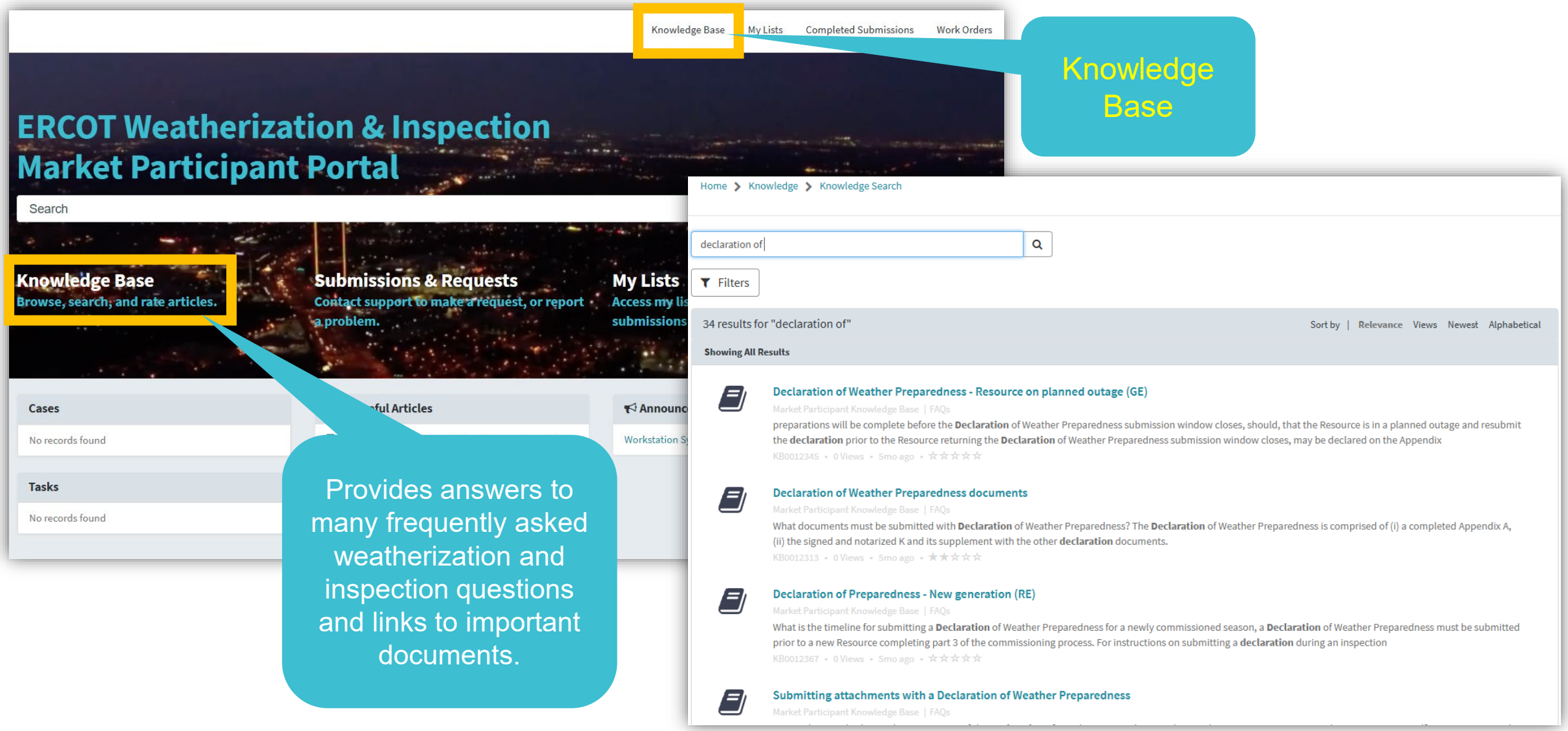
SN_M_W_VIEW_ECEII – for employees with **read-only** privileges

➢ If both roles are assigned, access will default to the role with the least permissions, VIEW, and the MP representative will **not** be able to complete actions in the portal.

Key Takeaway: To be able to take any action in the portal, a user must have the manager role – SN_M_W_MGR_ECEII.

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Portal Highlights – Knowledge Base Articles

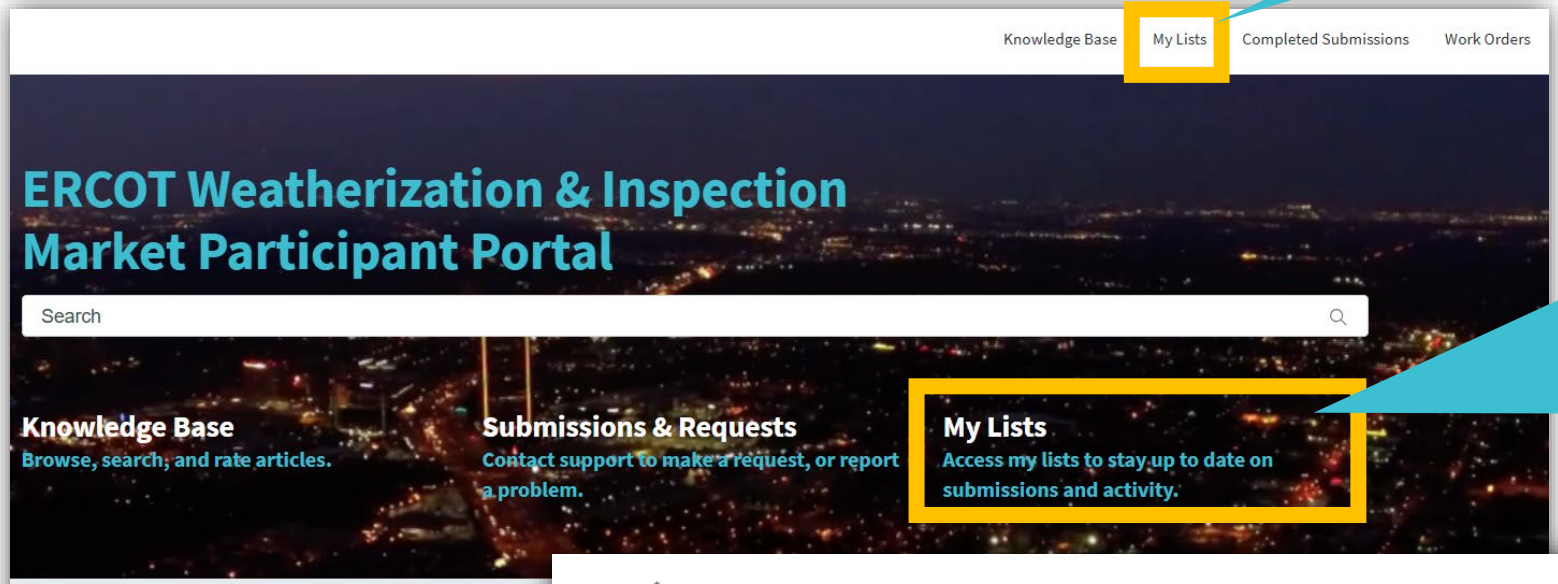


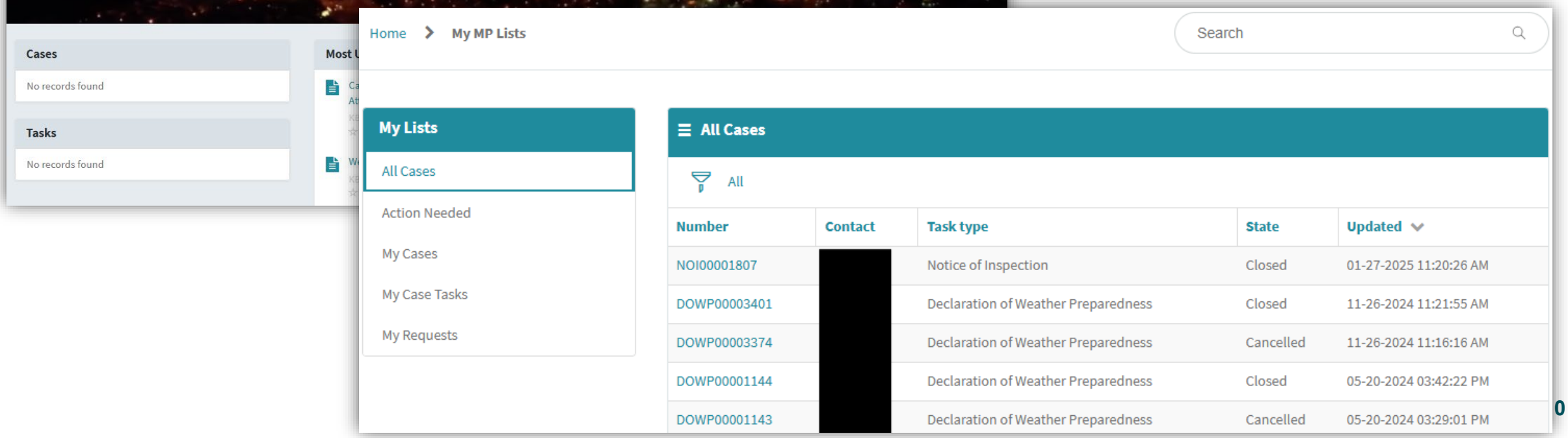
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Portal Highlights – My Lists

My Lists

Provides a record of all draft, submitted, and canceled DoWPs, weatherization support requests submitted, and Notices of Inspections sent.



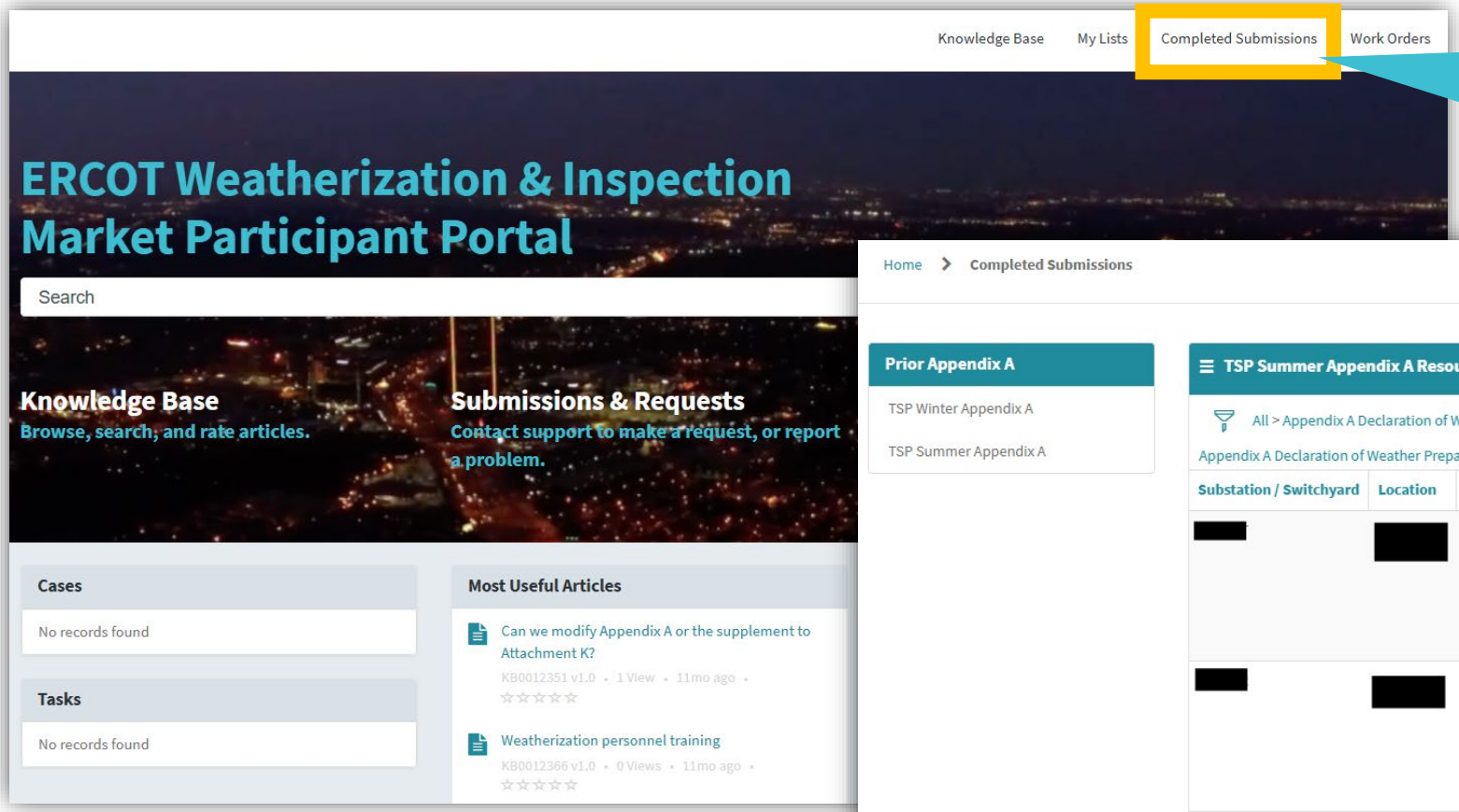


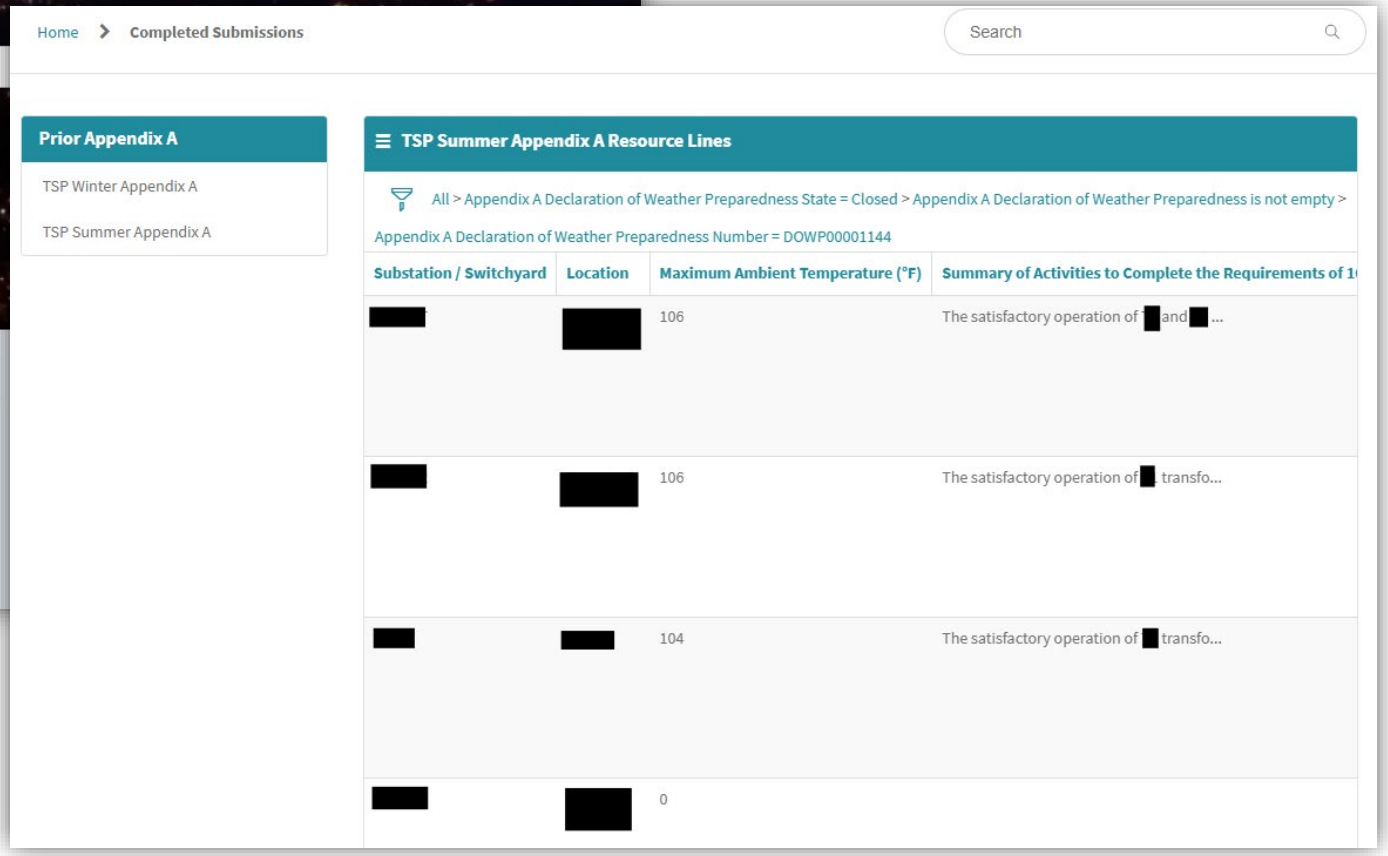
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Portal Highlights – Completed Submissions

Completed Submissions

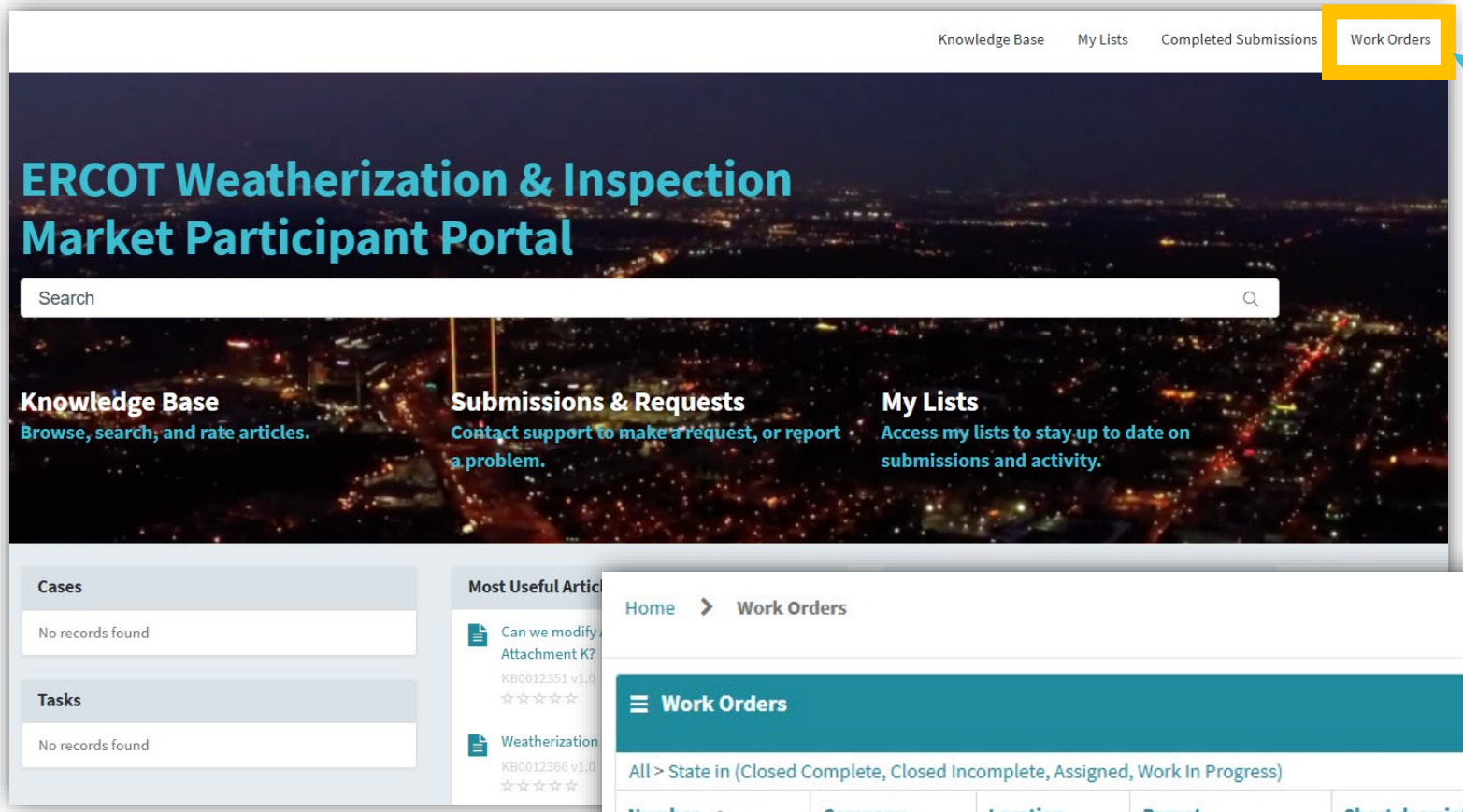
Record of all Appendix A submissions





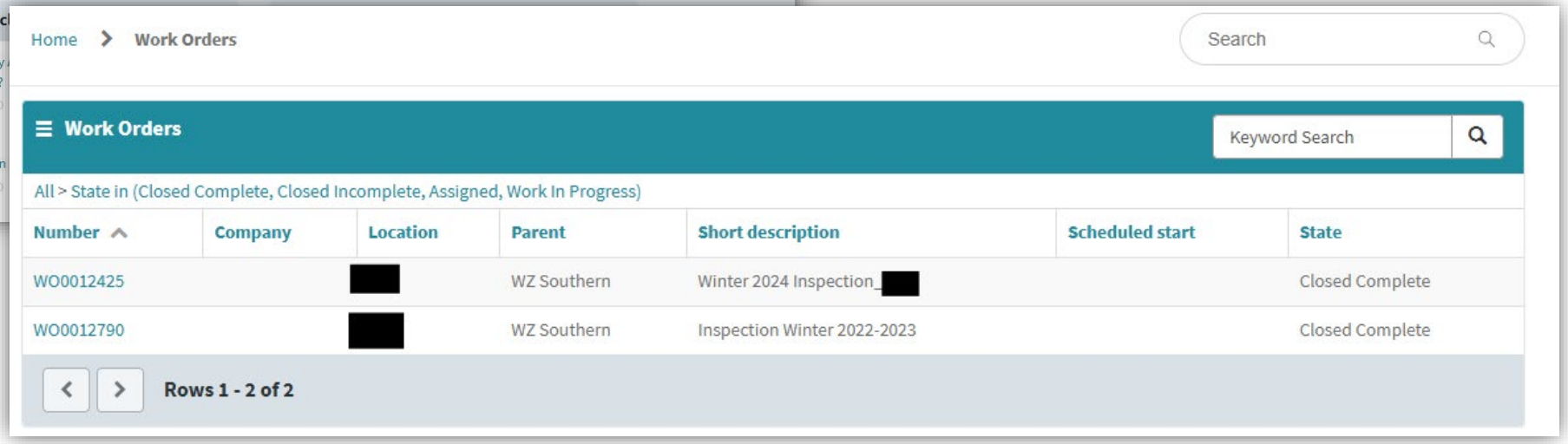
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Portal Highlights – Work Orders



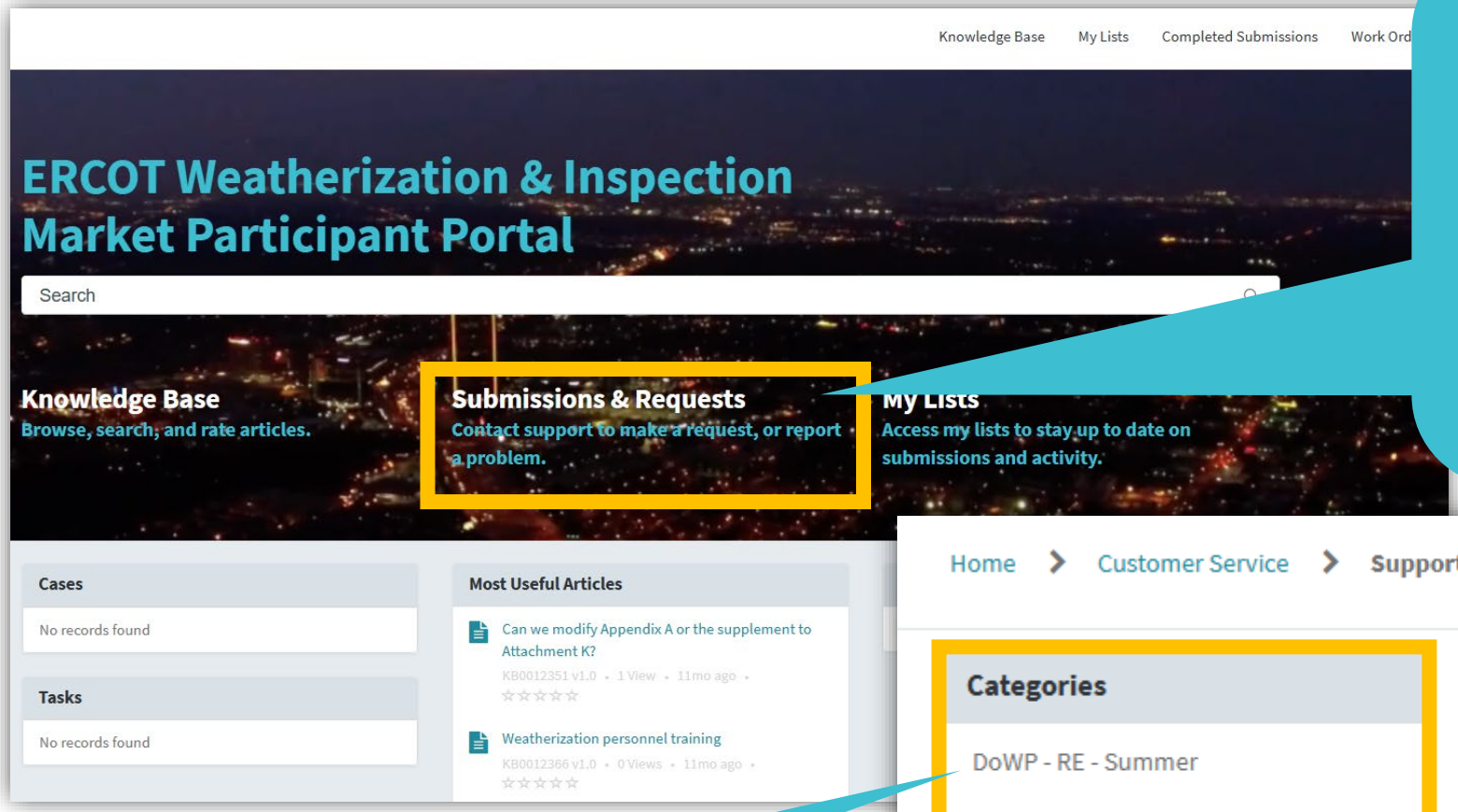
Work Orders

Record of all inspection work orders and the activity, communication, and attachments associated with the inspection work order, including the inspection report.



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Portal Highlights – Submissions & Requests



Submissions & Requests

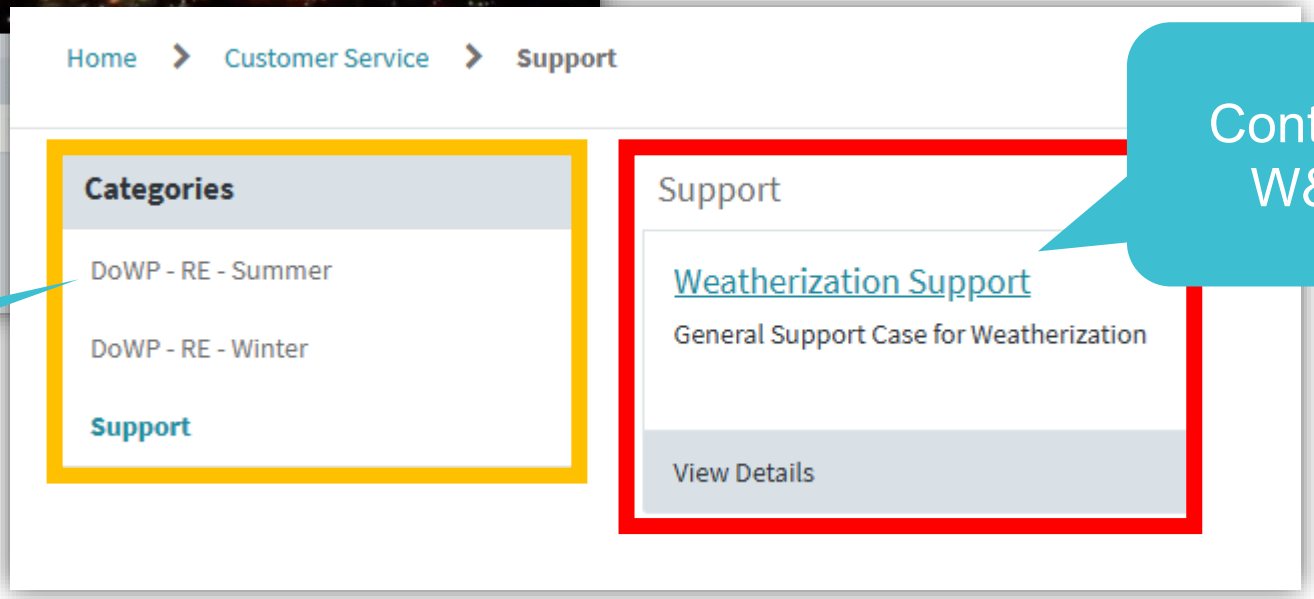
Submissions

Submit a Declaration of Weather Preparedness (DoWP)

Requests

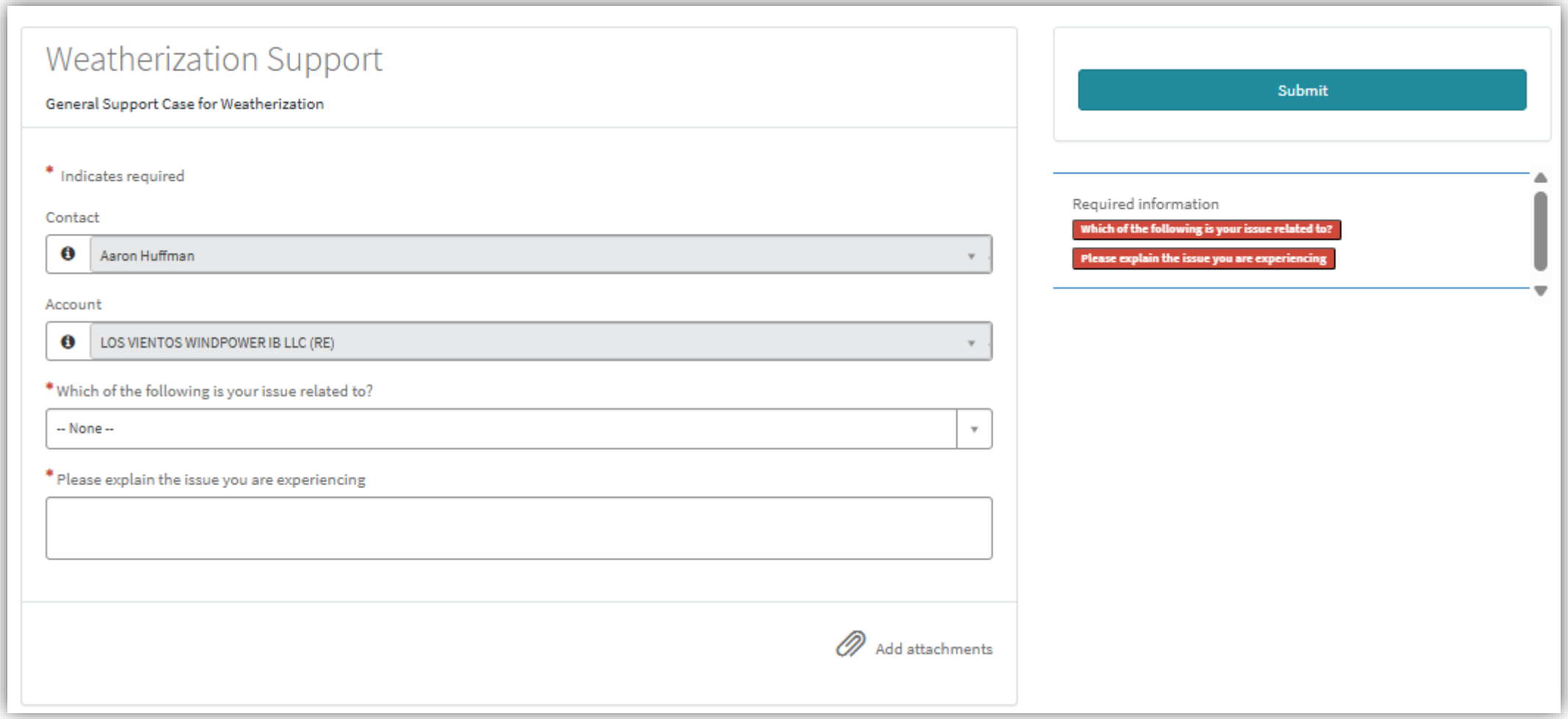
Submit a weatherization support request (wSUP) directly to W&I staff.

Submit a DoWP



Contact W&I

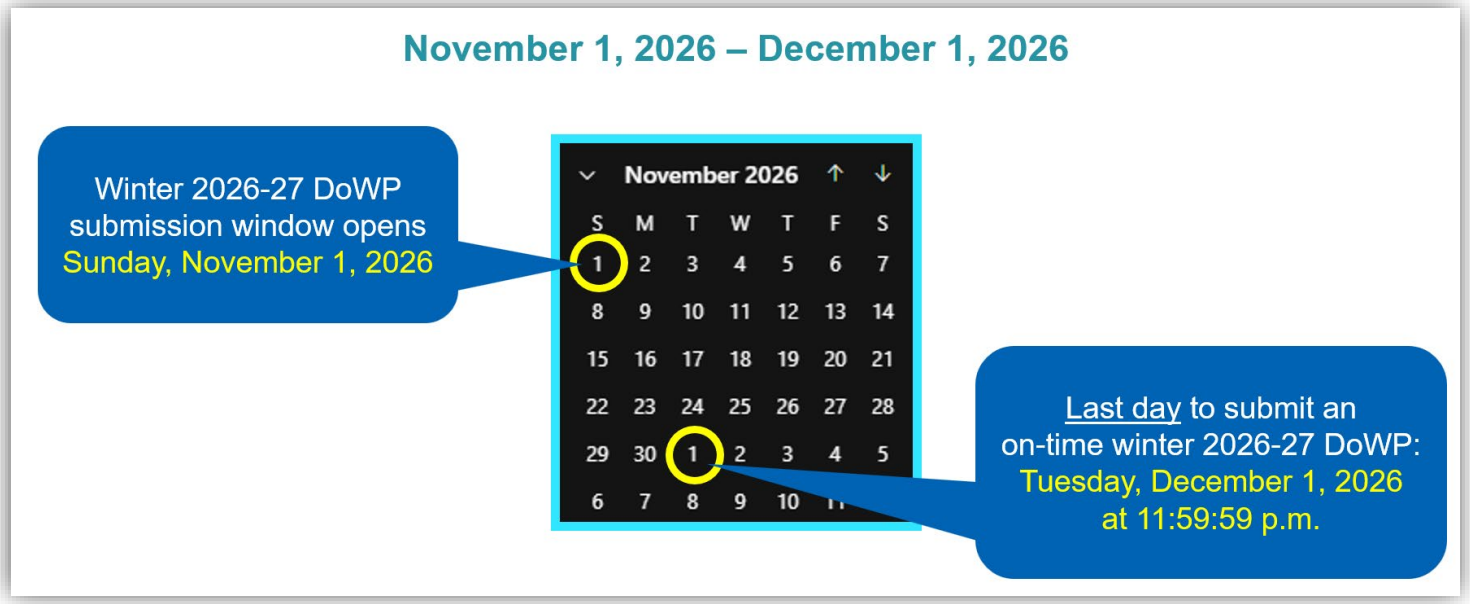
Portal Highlights – Weatherization Support Request (wSUP) Form



When are Declarations of Weather Preparedness (DoWP) submitted?

The PUCT Weather Emergency Preparedness Rule establishes seasonal DoWP requirements and deadlines:

- "No earlier than **November 1** and no later than **December 1** of each year, a generation entity must submit a declaration of winter weather preparedness for the upcoming winter season" (16 TAC §25.55(c)(3)(A))
- "No earlier than **May 1** and no later than **June 1** of each year, a generation entity must submit a declaration of summer weather preparedness for the upcoming summer season" (16 TAC §25.55(c)(3)(B))



When does a GE with a fully commissioned resource submit a DoWP?

A GE with a fully commissioned resource

→ Must submit a DoWP during the required submission period:
- Winter submission period: Nov 1-Dec 1
- Summer submission period: May 1-June 1

A GE with both a fully commissioned Resource and a Resource in the ERCOT Resource Interconnection Process

→ Must submit a DoWP for all fully commissioned resources during the required submission period:
- Winter submission period: Nov 1-Dec 1
- Summer submission period: May 1-June 1

➢ Refer to slide 17 for DoWP submission requirements for a GE with a Resource in the ERCOT Resource Interconnection Process.

When does a GE with a Resource in the commissioning process submit a DoWP?

A GE with a resource in **part 1 or 2** of the ERCOT Resource Interconnection Process

- Not required to submit a DoWP but may submit.
- If all weatherization requirements are met, the resource may be declared.
- If weatherization requirements are not met, the resource should not be declared.

A GE with a resource approaching the end of **part 3** of the ERCOT Resource Interconnection Process

- Must submit a DoWP during the DoWP submission period or inspection season provided all weatherization requirements are met.
  - **Winter** -- Submission period: Nov 1-Dec 1; Inspection season: Dec 2-Feb 28
  - **Summer** -- Submission period: May 1-June 1; Inspection season: June 2-September 30
- DoWPs are not required or accepted outside of the winter and summer submission period and inspection season. The portal is closed for all GE submissions.
  - March, April, and October.

Resources:

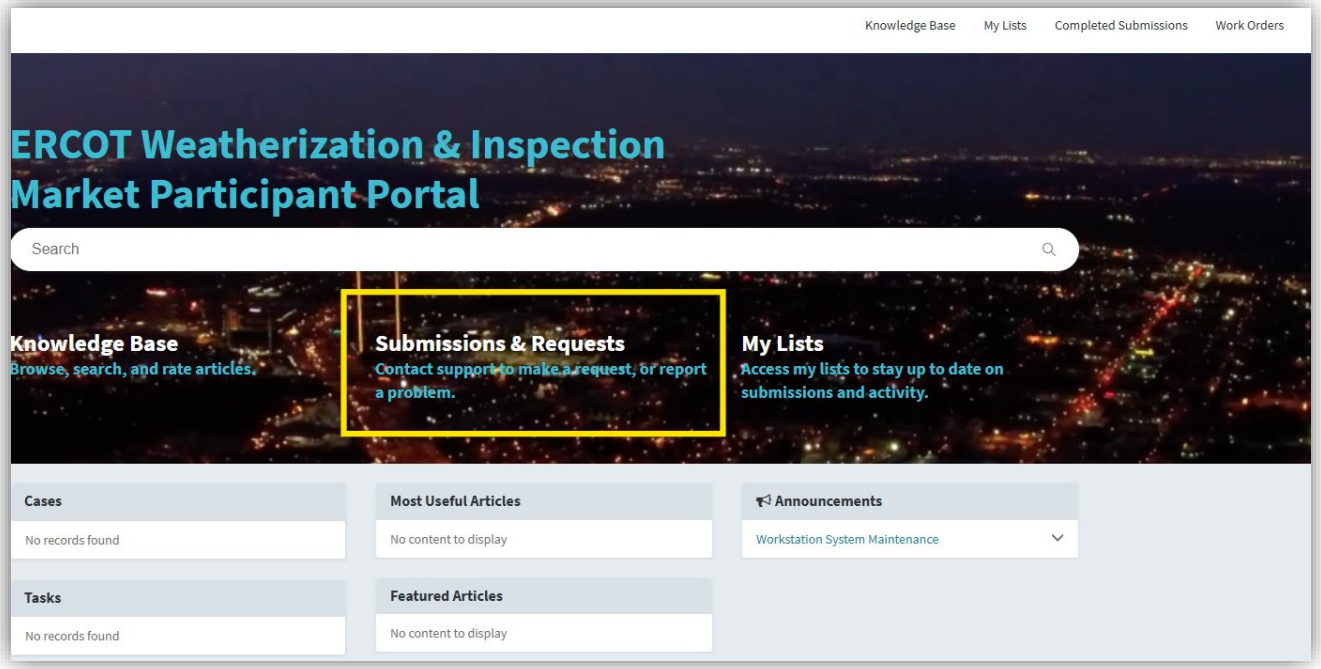
- Instructions for Submitting a Declaration for a New Resource Seeking Approval for Part 3 of the ERCOT Commissioning Process
- Weatherization Presentation for Resource Integration

16 TAC §25.55(c)(3)(C) states that a GE seeking commissioning approval for a new resource during the summer or winter season,

"…**must submit the appropriate declaration of preparedness prior to the resource commissioning date established in the ERCOT interconnection process for resources.**"

What is the process for submitting a DoWP?

1. Secure a digital certificate from the MP USA with the appropriate manager role.
   - Manager role: S N _ M _ W _ M G R _ E C E I I.
2. Log into the portal through the ERCOT MIS, https://mis.ercot.com/secure/applications.
3. Navigate to “Submissions and Requests.”



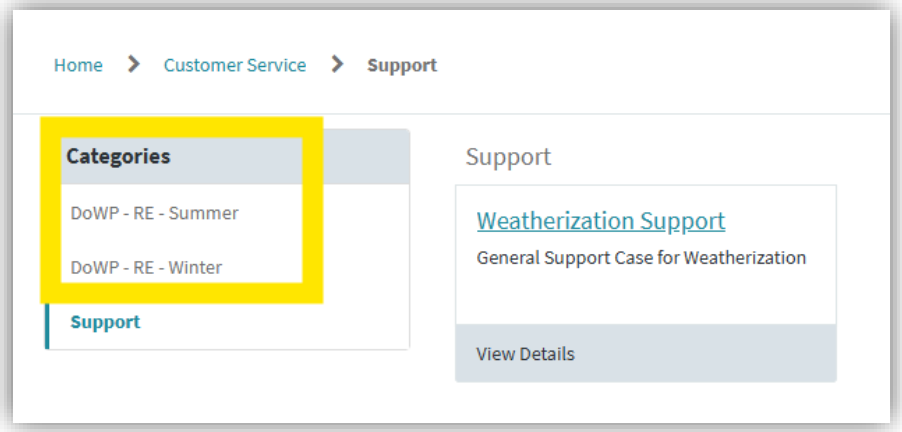
Resources:

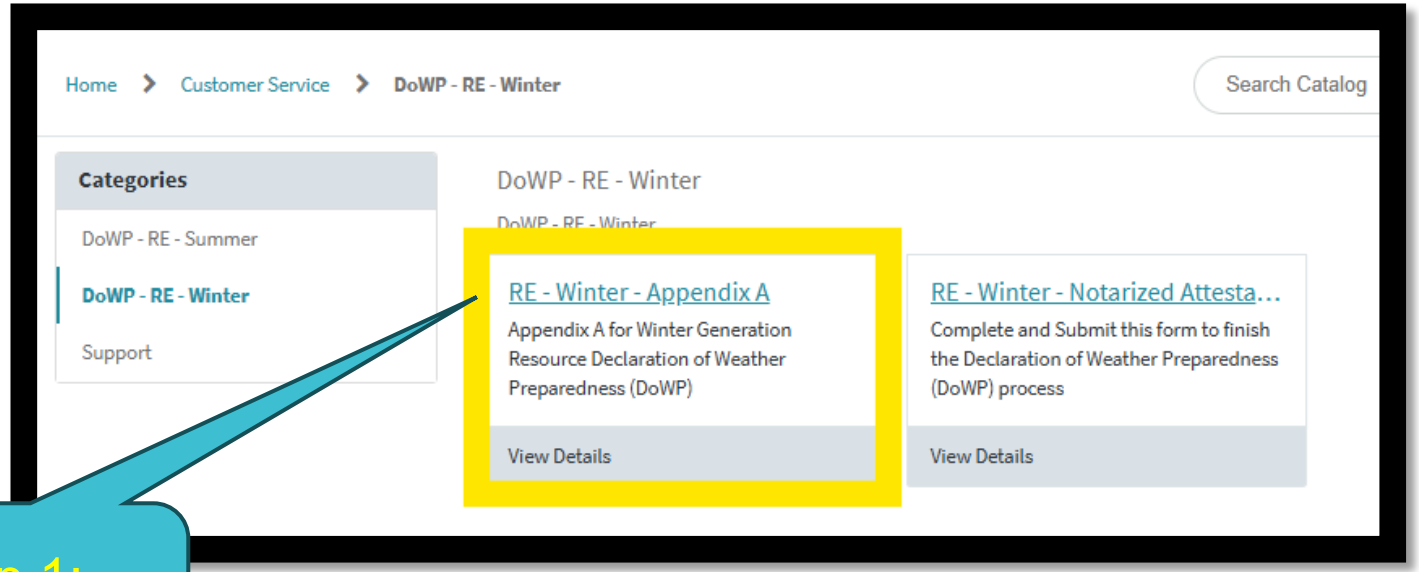
- Portal Knowledge Base Articles
- Weatherization & Inspection Market Participant Portal User Guide

What is the process for submitting a DoWP?

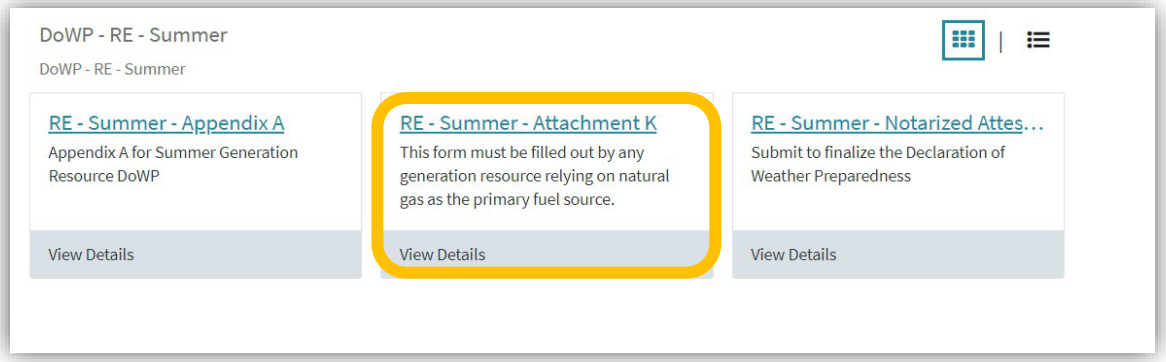
4. Navigate to ‘Categories’ and select the DoWP for the relevant inspection season.

5. Select Appendix A.



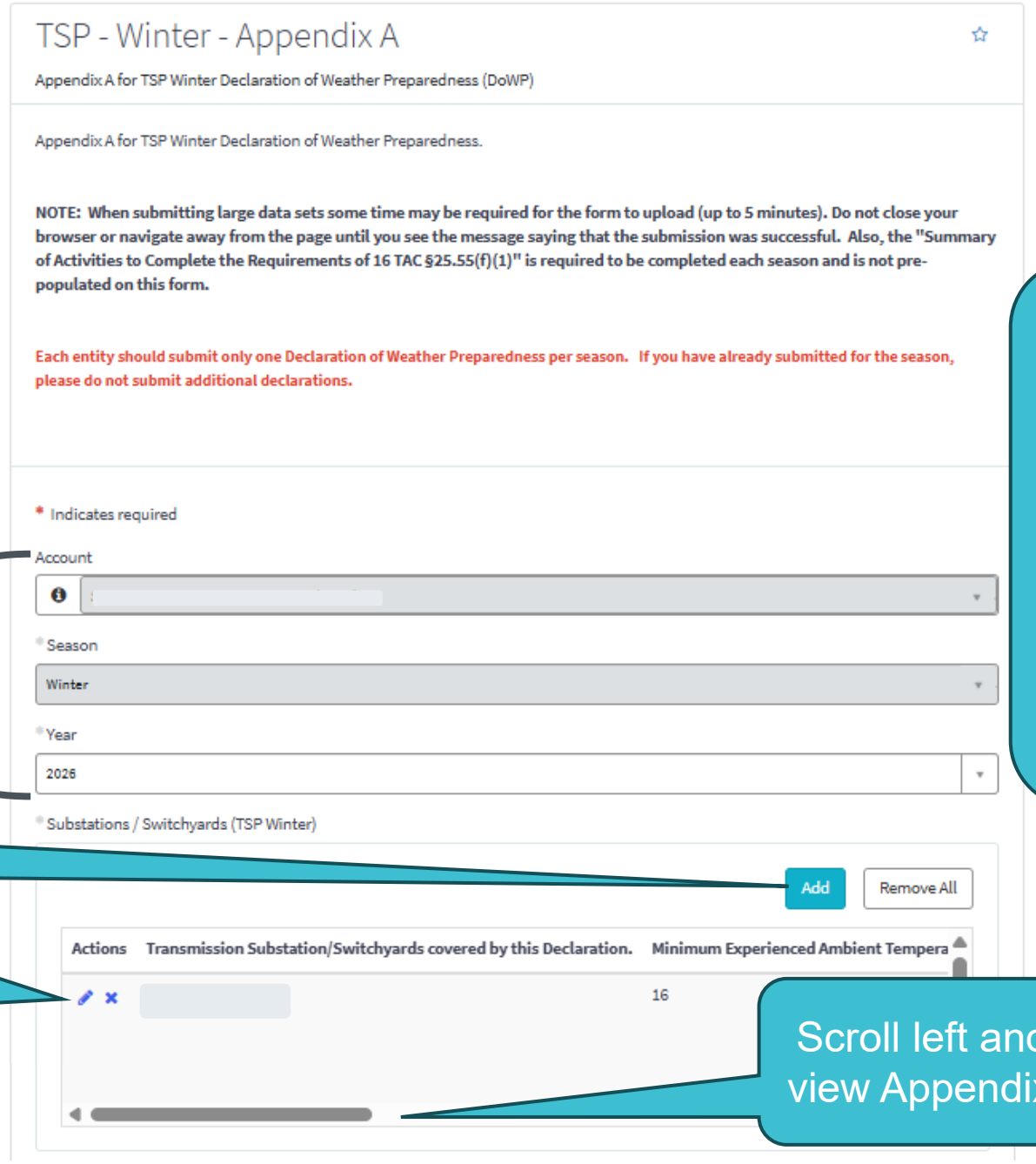


Step 1: Appendix A



What is Appendix A?

Appendix A is a digital form in the portal that an MP completes to declare whether all the applicable weatherization requirements have been completed for the listed Resource or substation/switchyard.



Confirm that the auto populated fields are correct.

Use the ‘Add’ option to add a Resource to Appendix A.

Use the pencil icon to edit all Appendix A fields for a resource or the ‘x’ icon to delete a resource.

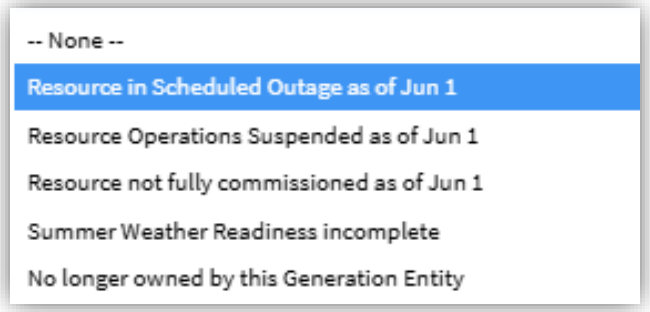
Use the ‘Submit’ option to **save** edits to Appendix A.

- Appendix A is automatically included in the declaration submission when the complete package is submitted within the Notarized Attestation section.

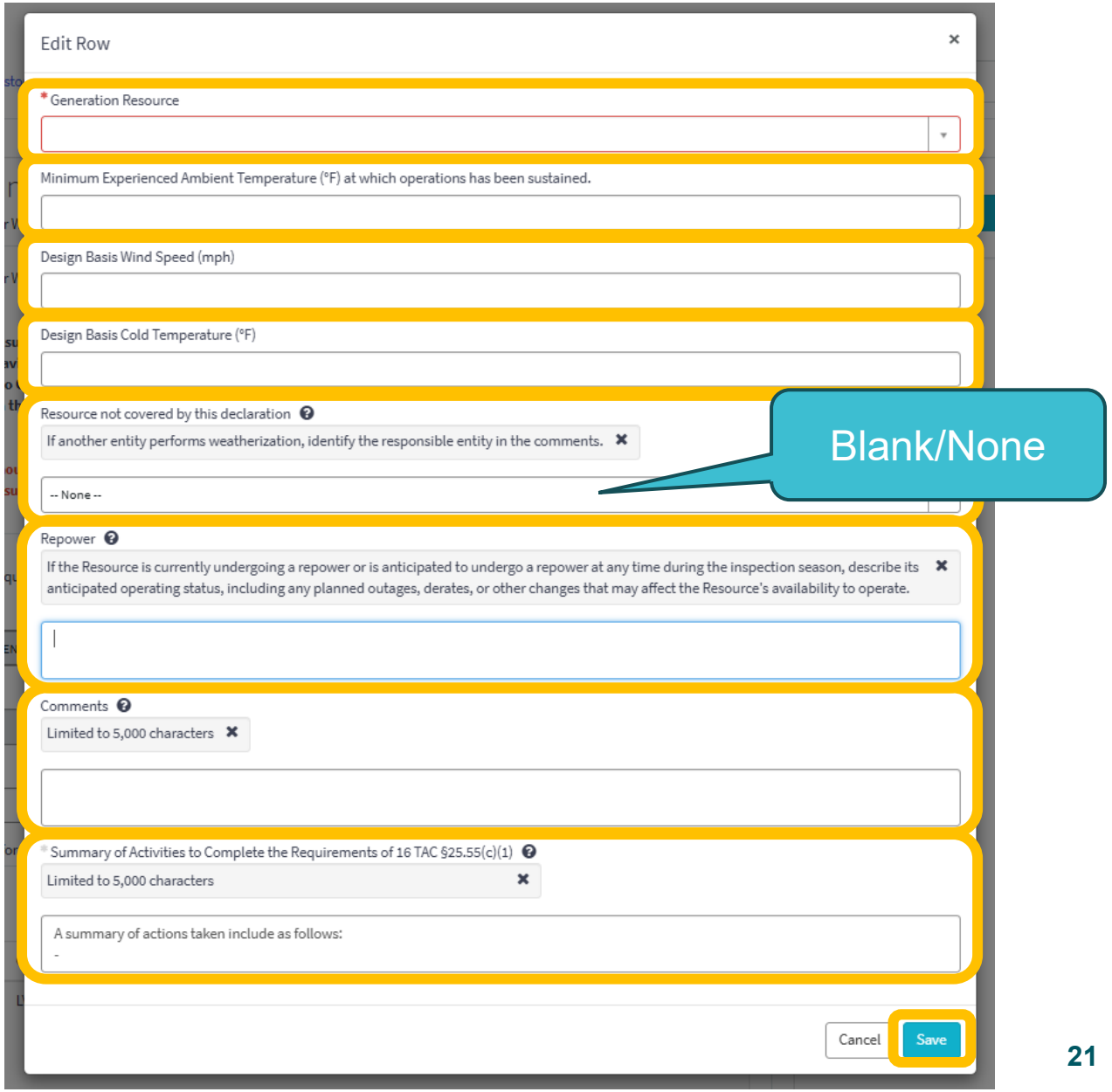
Scroll left and right to view Appendix A fields

How is a fully weatherized resource, whether it is commissioned or not, declared on Appendix A?

6. To declare a fully weatherized resource on Appendix A:
   - Complete all required fields on the Appendix A form:
     - Generation Resource or substation/switchyard – add using the drop-down list
     - Maximum Experienced Ambient Temperature (°F) at which operations have been sustained
     - Resource not covered by this declaration
       - Field should be left **blank** to confirm that the resource is covered under the declaration and meets all applicable weatherization requirements. If not, use the drop down to add a reason.



     - Summary of Activities to Complete the Requirements of 16 TAC §25.55.
       - A separate attachment may be included with the Notarized Attestation. In this case, leave a note, “see attachment [name].



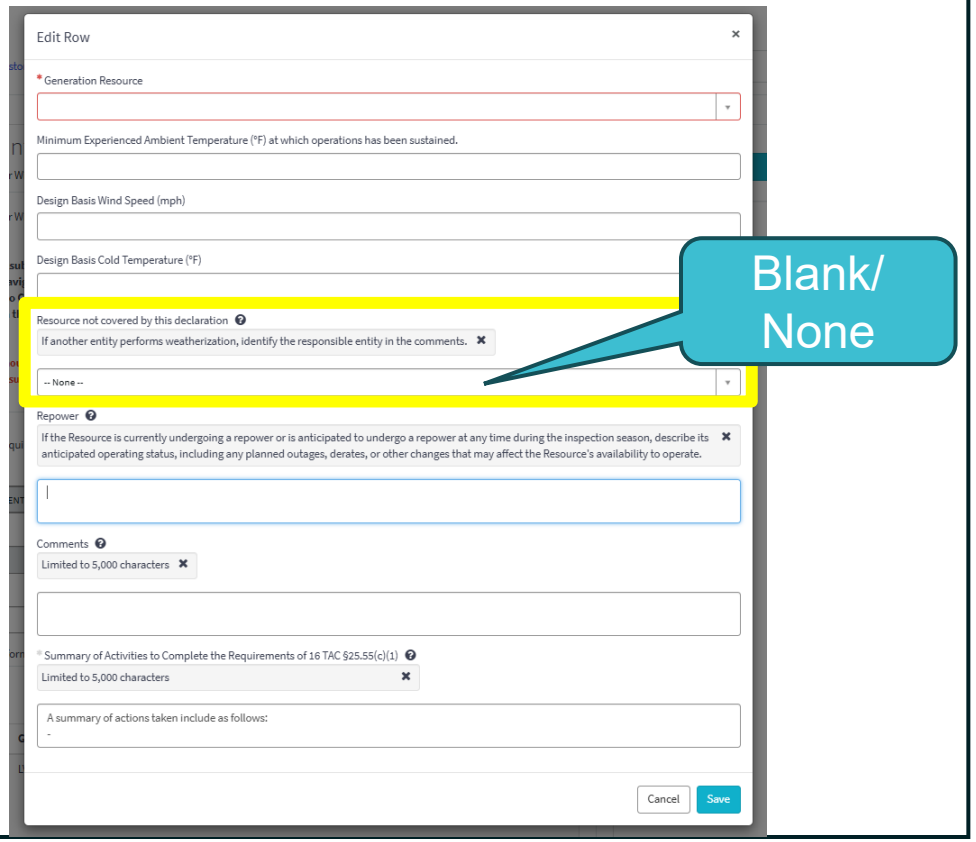
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How is a resource that is not fully commissioned declared on Appendix A?

7. Correctly declaring a resource that is not fully commissioned on **Appendix A** depends on whether all weatherization requirements have been met.

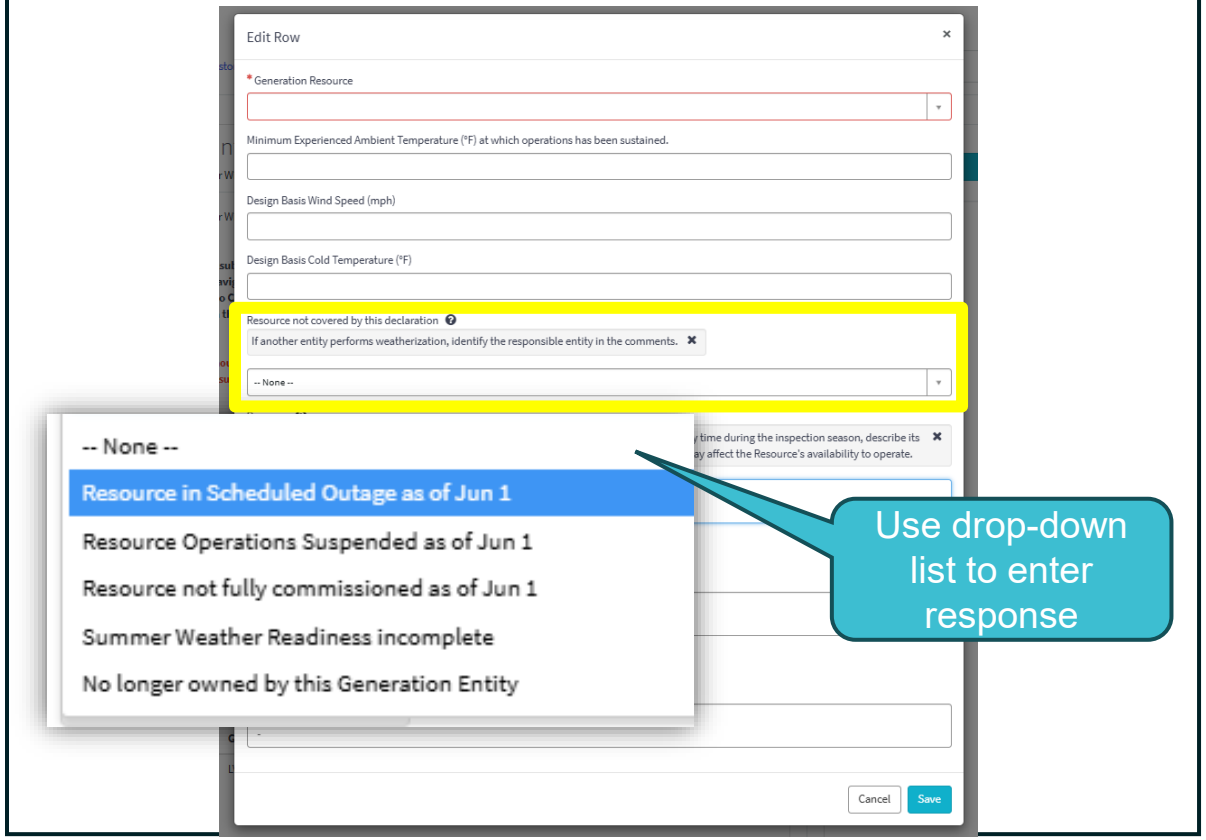
All weatherization requirements **are met**:

- leave the field, 'Resource not covered by this declaration,' **blank**.



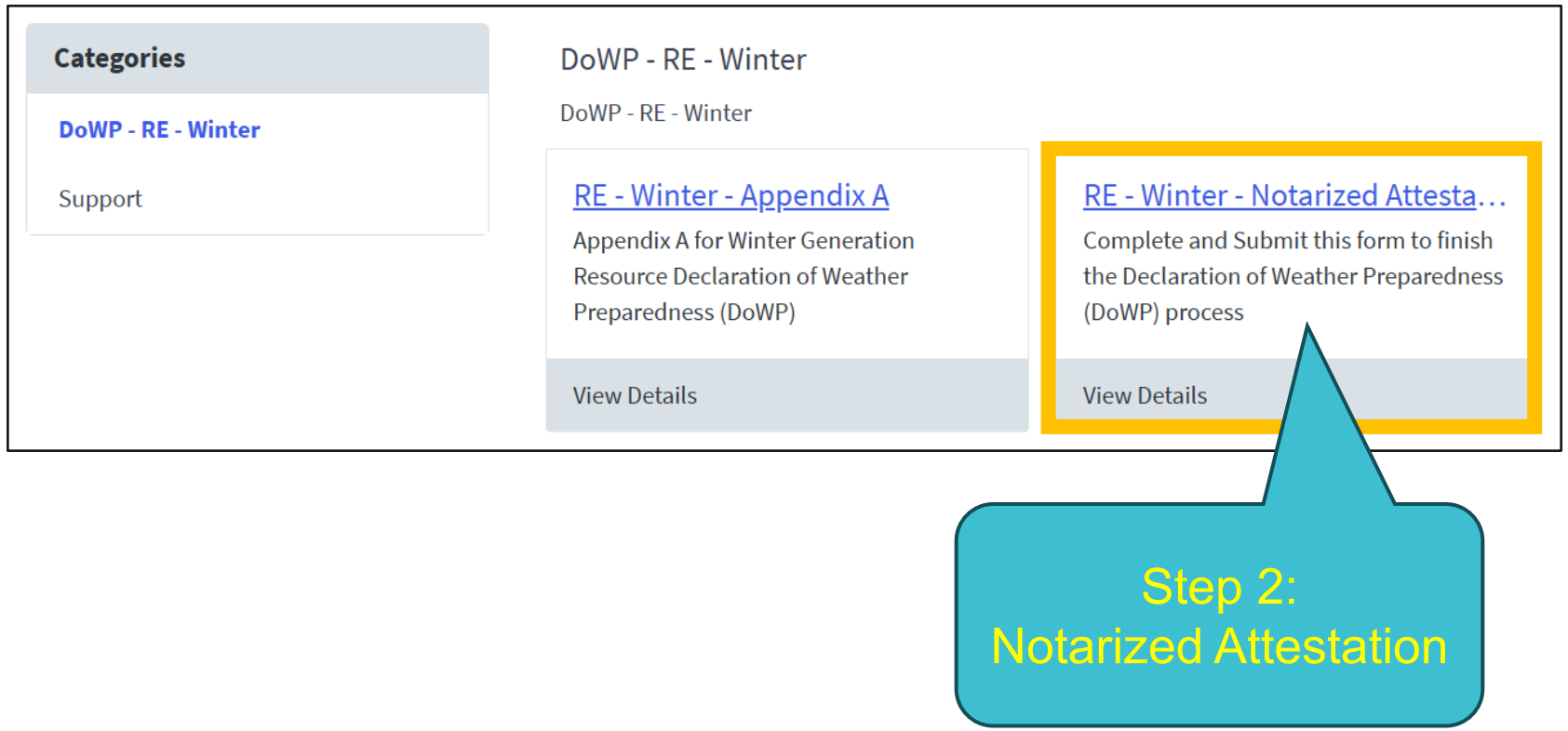
All weatherization requirements **are not met**:

- choose from the drop-down list, "Resource not fully commissioned as of June 1 or December 1."



What is the next step after submitting Appendix A?

8. Complete the Notarized Attestation section and upload the complete declaration/attestation document.
   - Must be signed by the highest-ranking representative, official, or officer *with binding authority* over the referenced GE or TSP and then notarized.

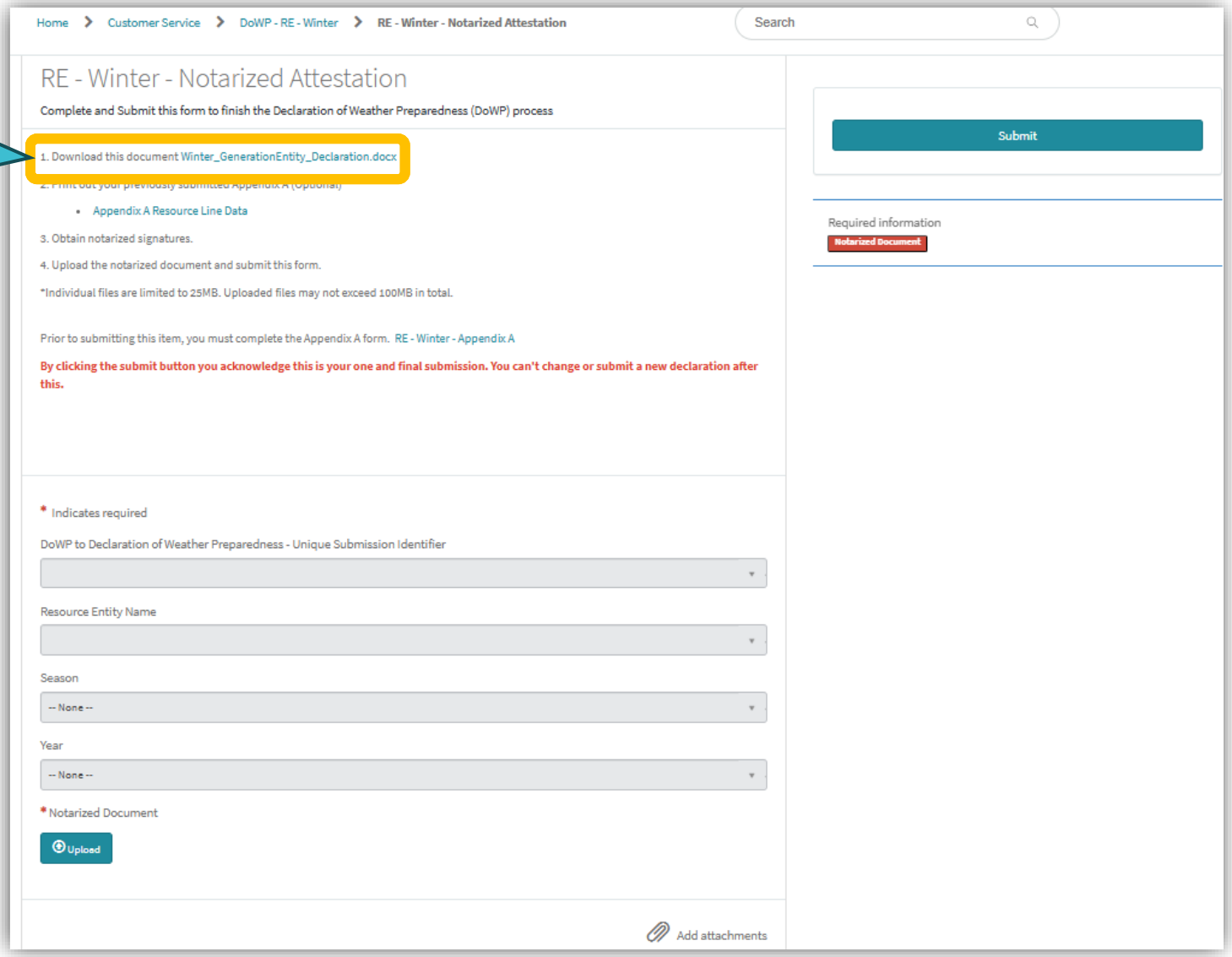


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What is the process for completing the Notarized Attestation?

1

Download and print the Declaration



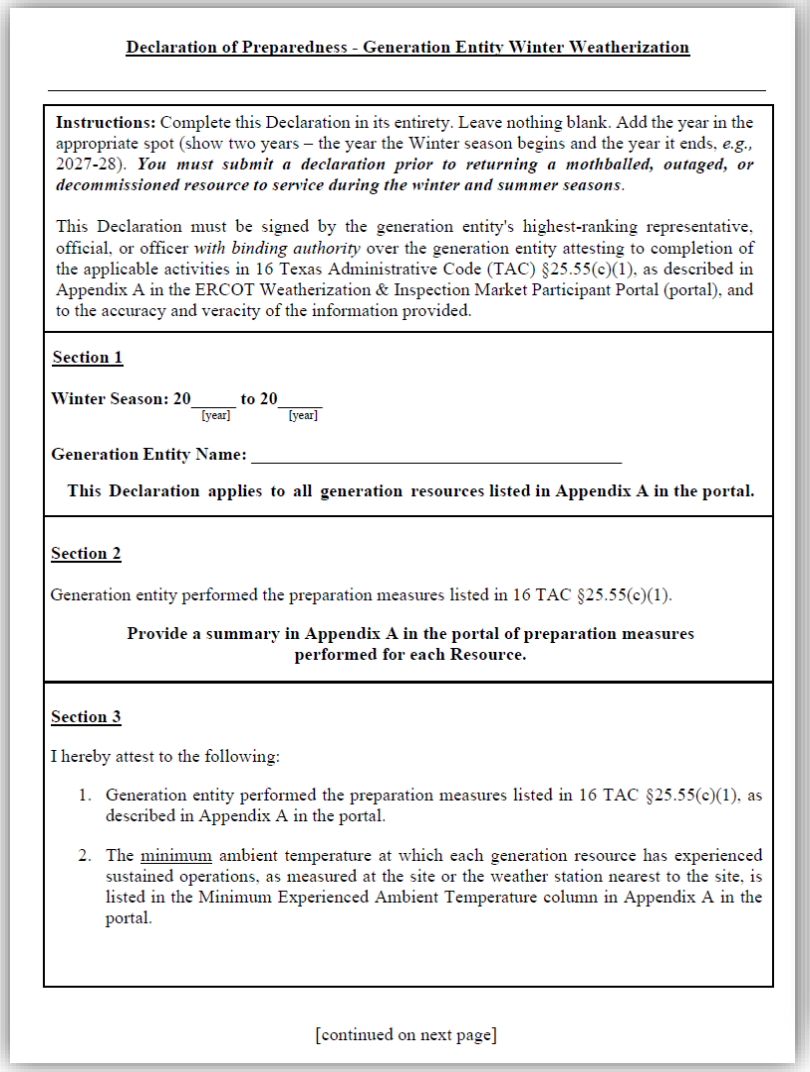
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What is the Declaration/Attestation?

The Declaration of Preparedness, also called the Declaration or Attestation, is a form on the portal within the Notarized Attestation section of the DoWP.

The form must be:

1. completed in its entirety– sections 1, 2, and 3
2. signed by the highest-ranking representative, official, or officer *with binding authority* over the referenced GE or TSP
3. notarized
4. uploaded to the Notarized Attestation section of the portal
5. submitted as part of the complete declaration



Declaration of Preparedness - Generation Entity Winter Weatherization

Instructions: Complete this Declaration in its entirety. Leave nothing blank. Add the year in the appropriate spot (show two years – the year the Winter season begins and the year it ends, *e.g.*, 2027-28). ***You must submit a declaration prior to returning a mothballed, outaged, or decommissioned resource to service during the winter and summer seasons.***

This Declaration must be signed by the generation entity's highest-ranking representative, official, or officer *with binding authority* over the generation entity attesting to completion of the applicable activities in 16 Texas Administrative Code (TAC) §25.55(c)(1), as described in Appendix A in the ERCOT Weatherization & Inspection Market Participant Portal (portal), and to the accuracy and veracity of the information provided.

Section 1

Winter Season: 20_____ to 20_____
[year] [year]

Generation Entity Name: _____

This Declaration applies to all generation resources listed in Appendix A in the portal.

Section 2

Generation entity performed the preparation measures listed in 16 TAC §25.55(c)(1).

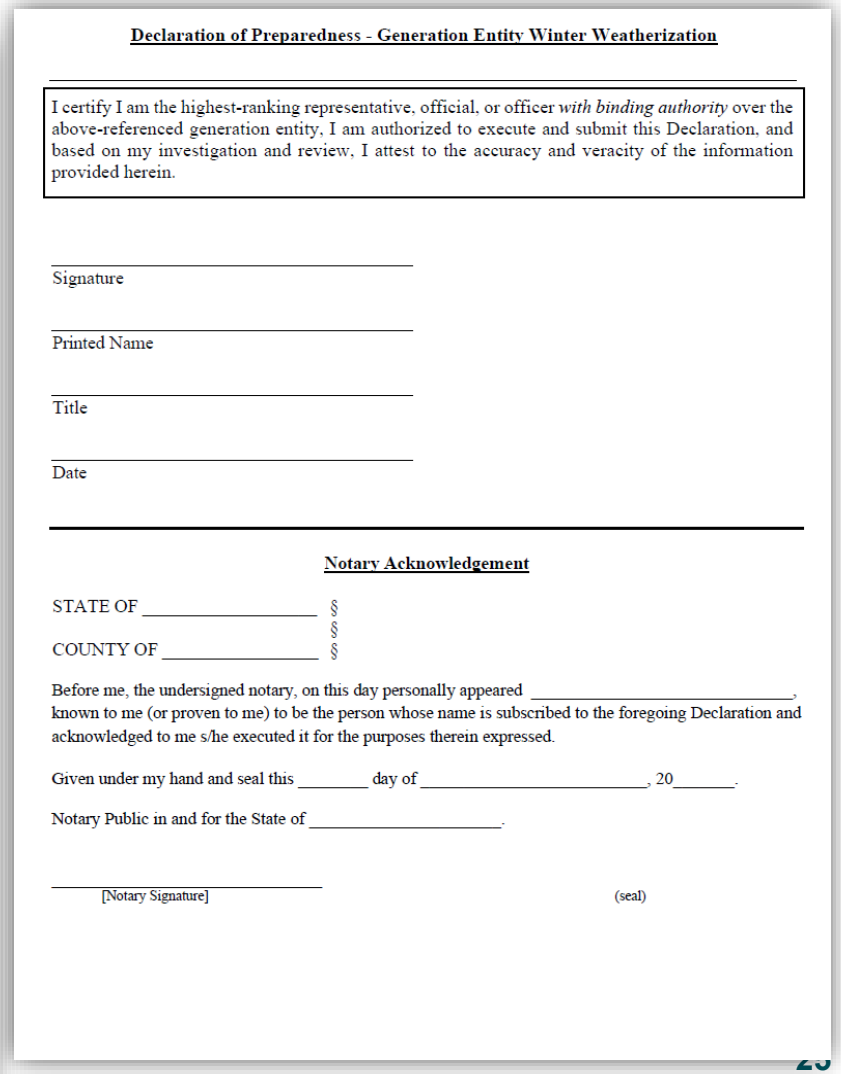
Provide a summary in Appendix A in the portal of preparation measures performed for each Resource.

Section 3

I hereby attest to the following:

1. Generation entity performed the preparation measures listed in 16 TAC §25.55(c)(1), as described in Appendix A in the portal.
2. The minimum ambient temperature at which each generation resource has experienced sustained operations, as measured at the site or the weather station nearest to the site, is listed in the Minimum Experienced Ambient Temperature column in Appendix A in the portal.

[continued on next page]



Declaration of Preparedness - Generation Entity Winter Weatherization

I certify I am the highest-ranking representative, official, or officer *with binding authority* over the above-referenced generation entity, I am authorized to execute and submit this Declaration, and based on my investigation and review, I attest to the accuracy and veracity of the information provided herein.

_____
Signature

_____
Printed Name

_____
Title

_____
Date

Notary Acknowledgement

STATE OF _____ §
§
COUNTY OF _____ §

Before me, the undersigned notary, on this day personally appeared _____, known to me (or proven to me) to be the person whose name is subscribed to the foregoing Declaration and acknowledged to me s/he executed it for the purposes therein expressed.

Given under my hand and seal this _____ day of _____, 20_____.

Notary Public in and for the State of _____.

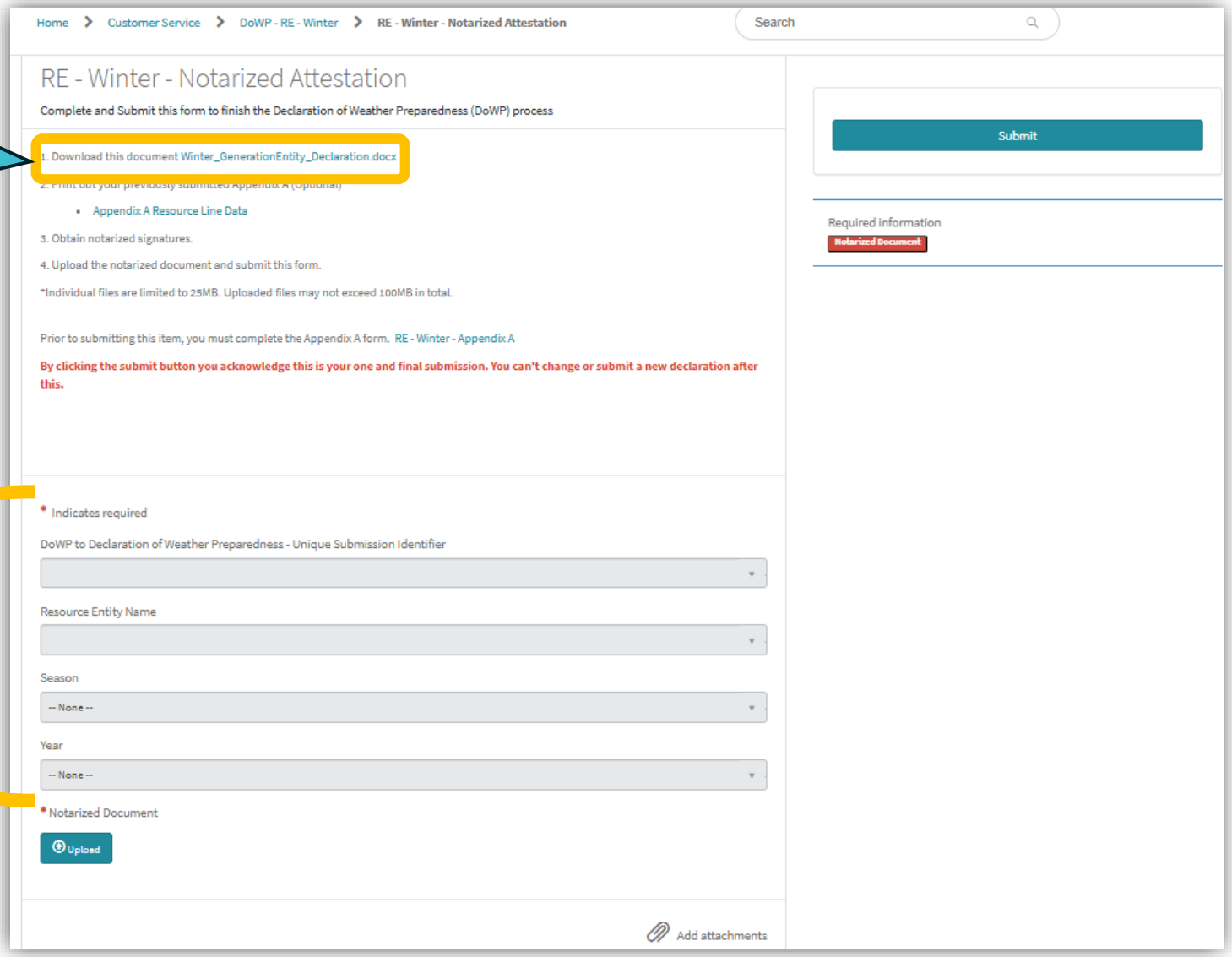
_____
[Notary Signature] (seal)

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What is the process for completing the Notarized Attestation?

1. Download and print the Declaration

2. Confirm information



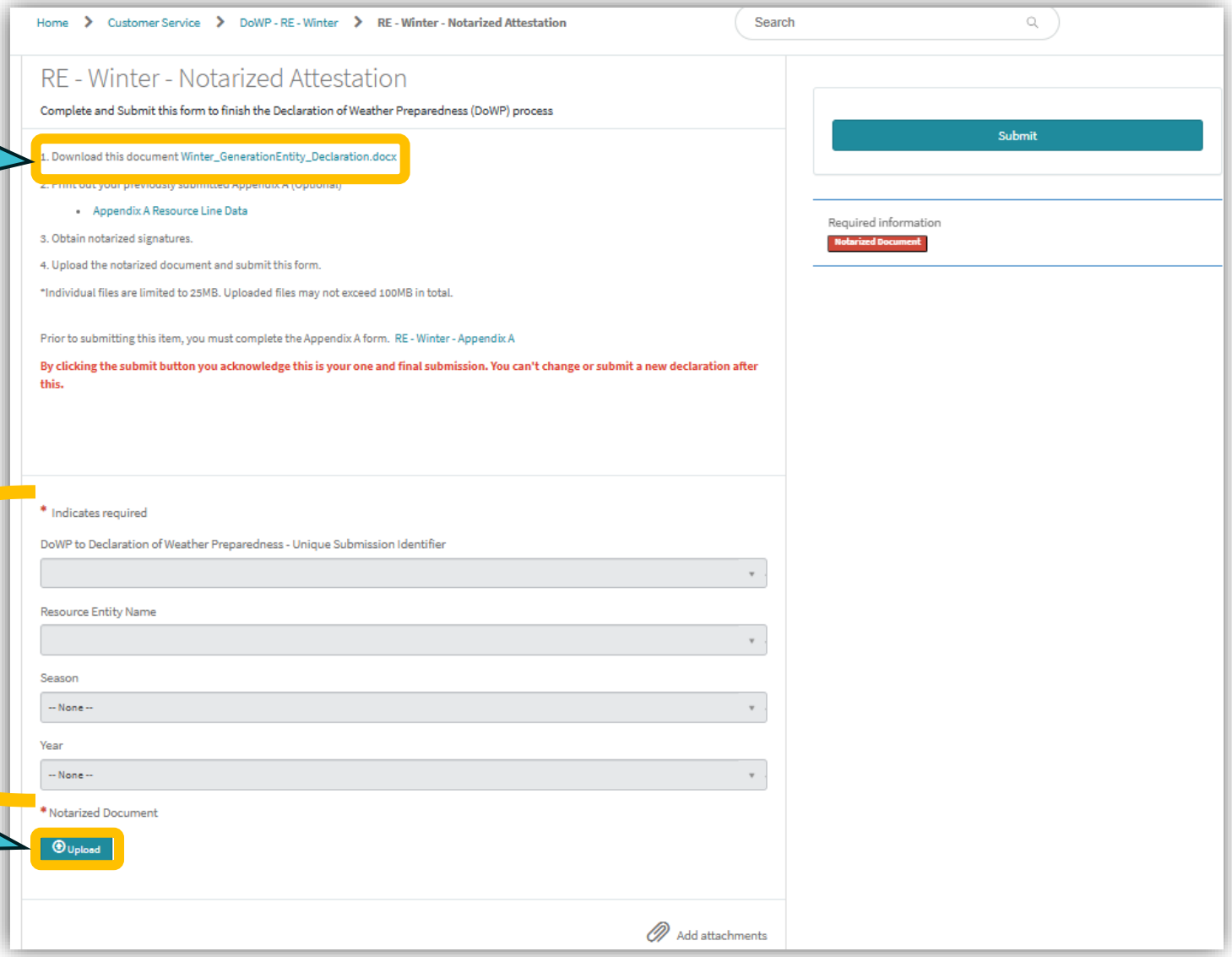
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What is the process for completing the Notarized Attestation?

1. Download and print the Declaration

2. Confirm information

3. Upload the complete signed and notarized form



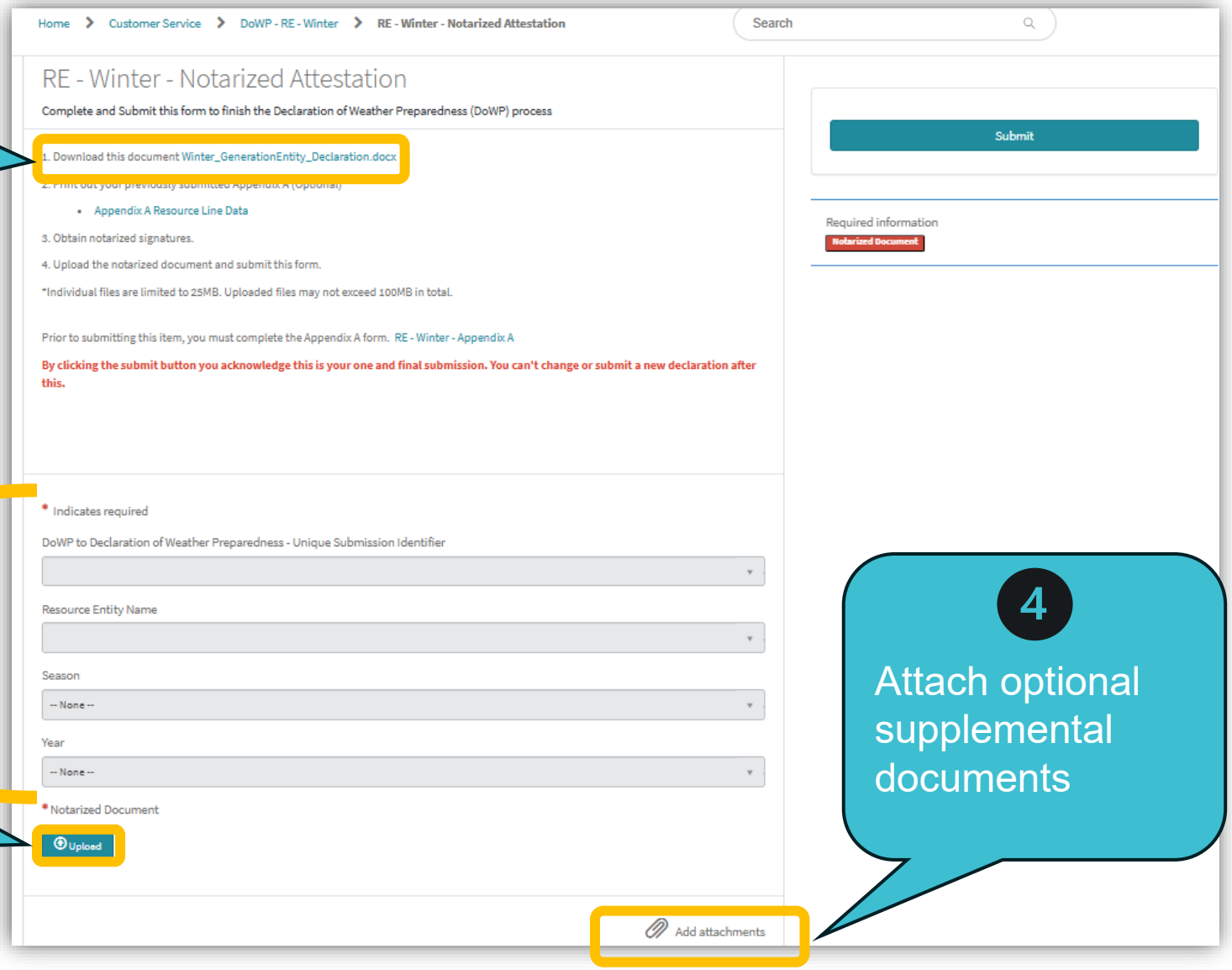
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What is the process for completing the Notarized Attestation?

1. Download and print the Declaration

2. Confirm information

3. Upload the complete signed and notarized form



4. Attach optional supplemental documents

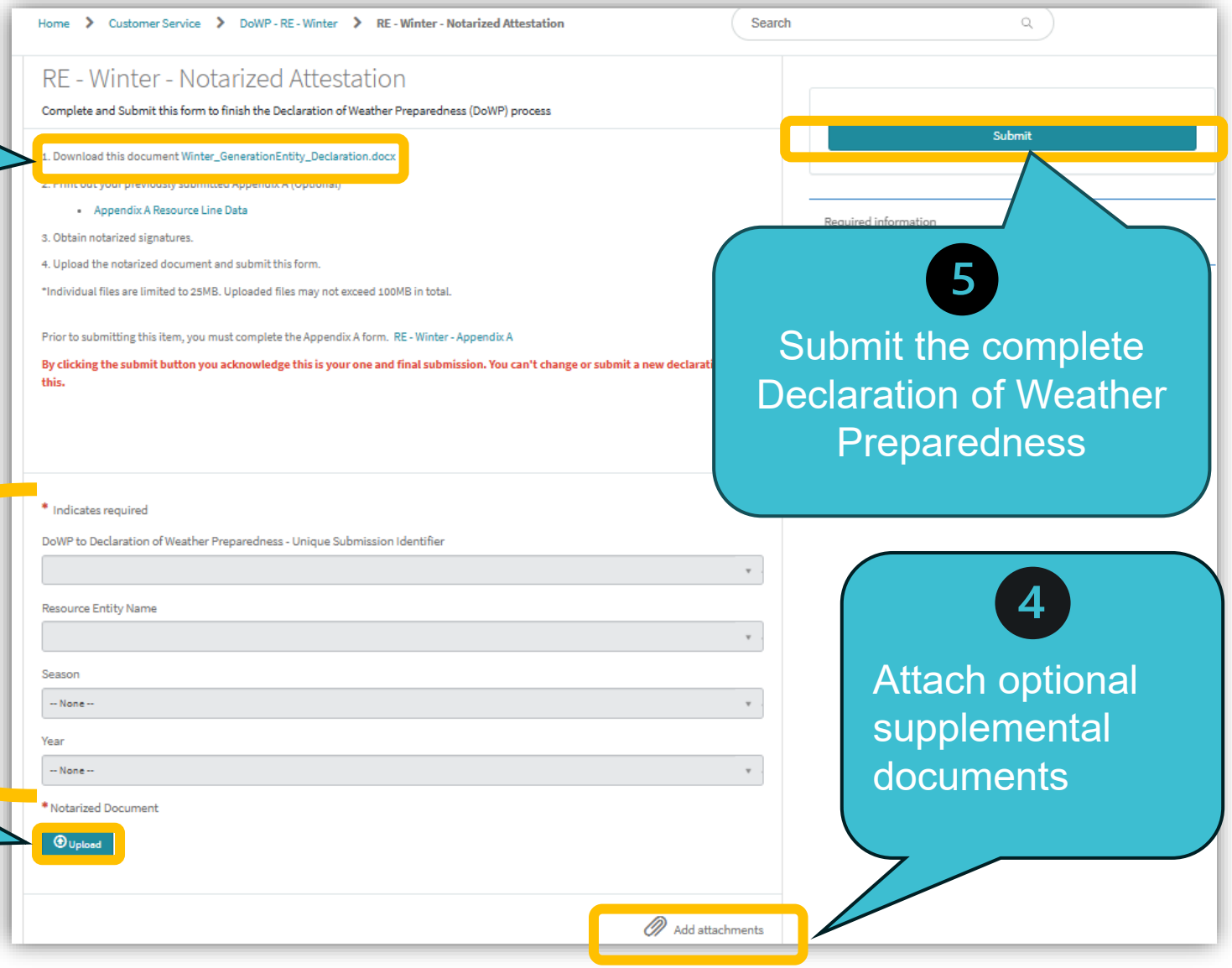
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What is the process for completing the Notarized Attestation?

1. Download and print the Declaration

2. Confirm information

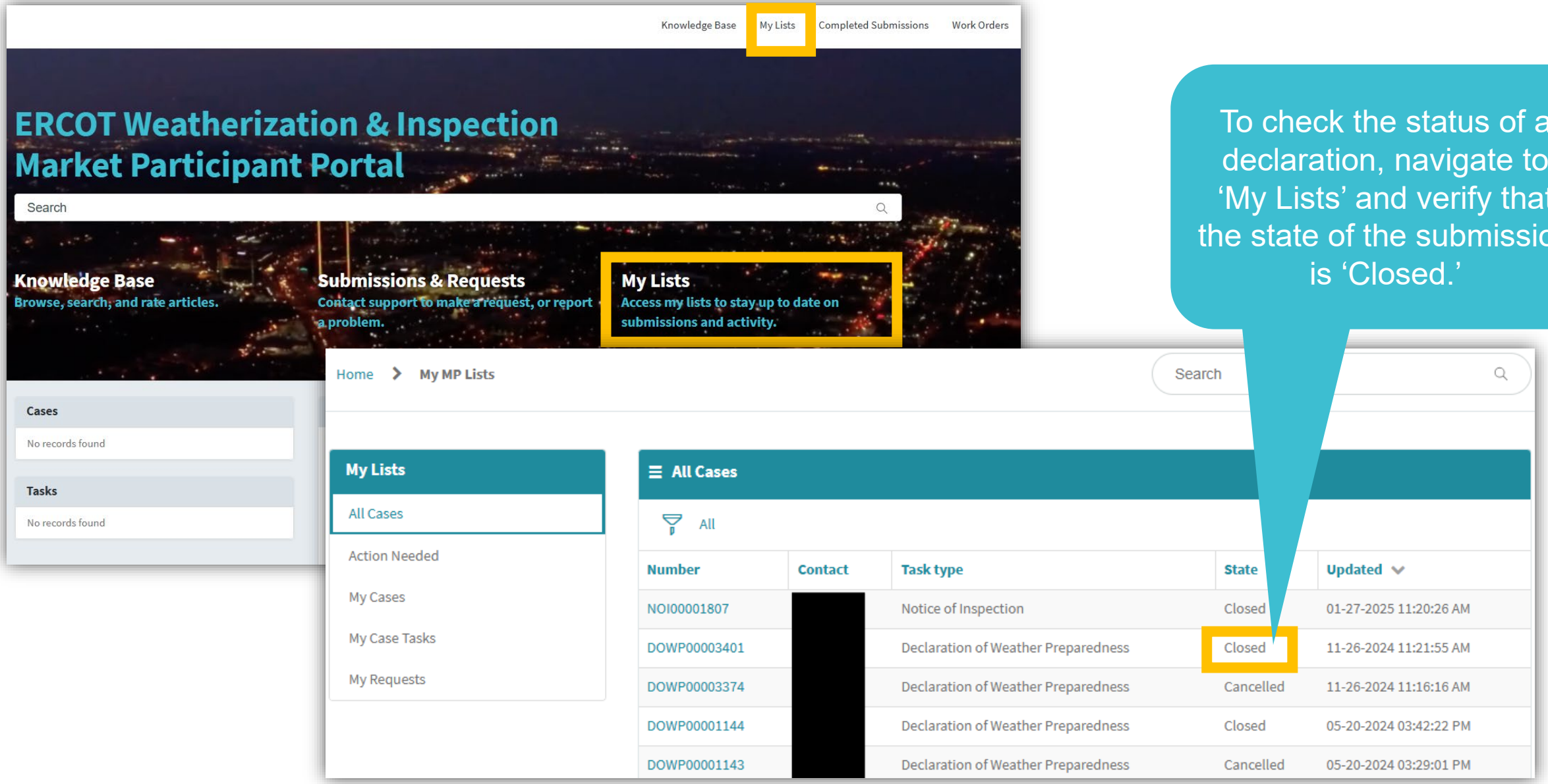
3. Upload the complete signed and notarized form



5. Submit the complete Declaration of Weather Preparedness

4. Attach optional supplemental documents

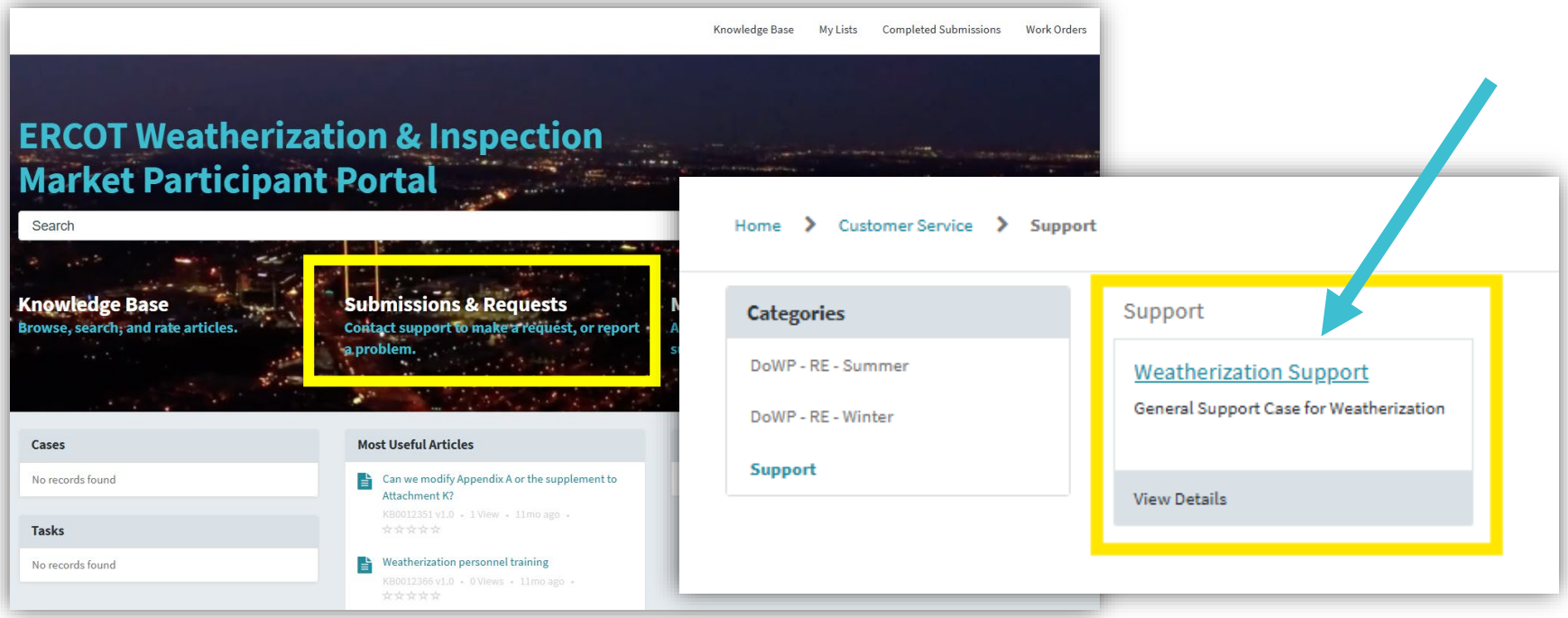
How can an MP confirm that a DoWP has been received by ERCOT?



To check the status of a declaration, navigate to ‘My Lists’ and verify that the state of the submission is ‘Closed.’

Can a declaration be revised after it is submitted?

- The portal does **not** allow a declaration to be revised once it has been submitted.
- If a revision is needed, submit a wSUP to alert W&I staff.
- In most cases, W&I staff will cancel the original DoWP to enable revisions and a resubmittal of the revised declaration package.
- Please note, when a declaration is revised, a **new** notarized attestation with signature and notary may be required.



What resources are available to help Market Participants meet rule requirements?

Online Resources:

Texas Administrative Code
PUCT Weather Emergency Preparedness Rule, 16 Texas Administrative Code (TAC) §25.55

ERCOT Historical Weather Study (Version 1.1 July 2022)

Weatherization and Inspection Webpages:
- Summer Weather Readiness
- Winter Weather Readiness

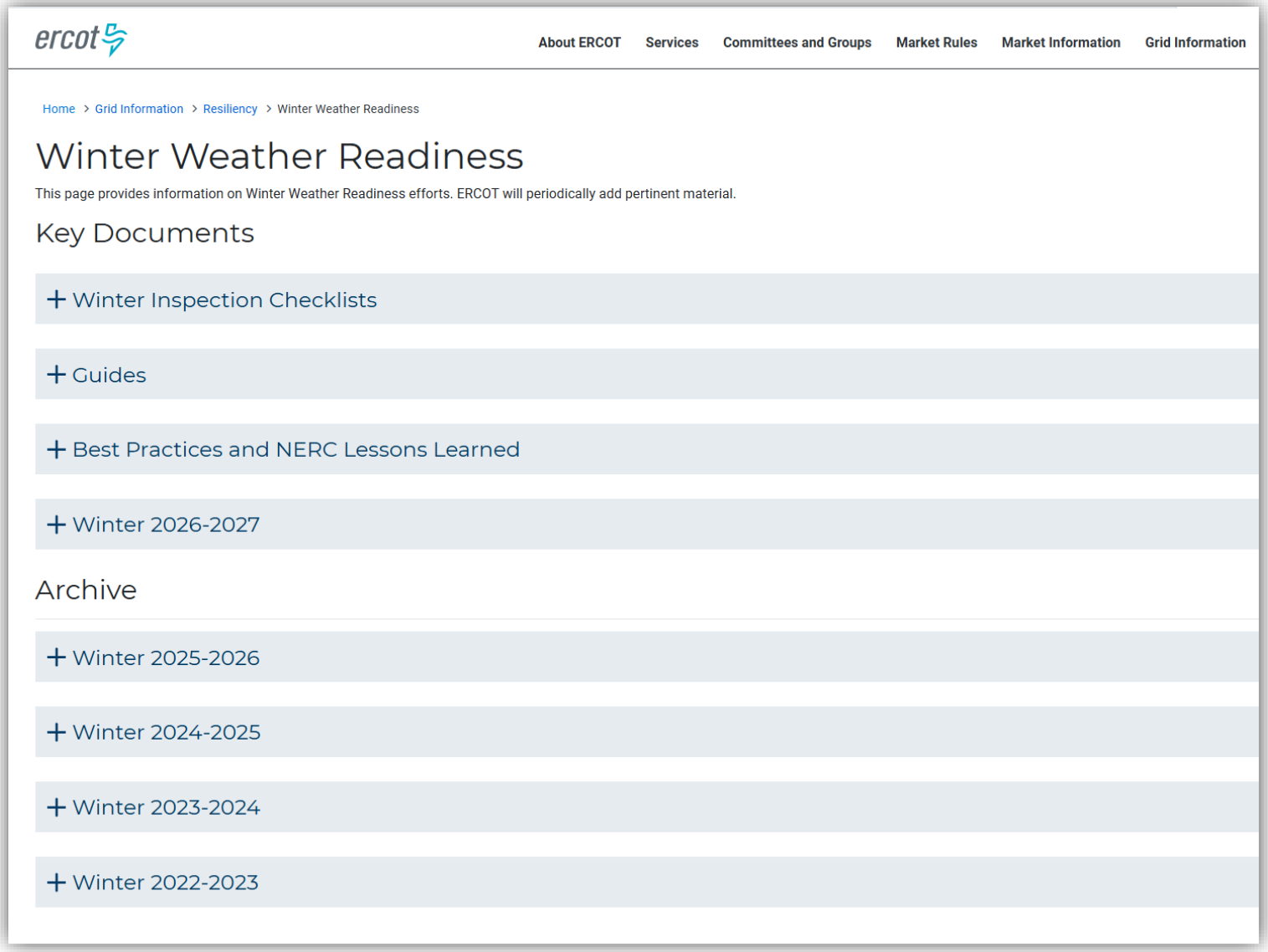
Guidance Documents:
- Weatherization & Inspection Market Participant Portal User Guide
- The Weatherization Inspection Process
- Weatherization Presentation for Resource Integration
- Instructions for Submitting a Declaration for a New Resource
- GE Winter Inspection Checklist
- TSP Winter Inspection Checklist
- Cold Weather Critical Components (CWCC) Sample List
- GE Summer Inspection Checklist
- TSP Summer Inspection Checklist
- Hot Weather Critical Components (HWCC) Sample List

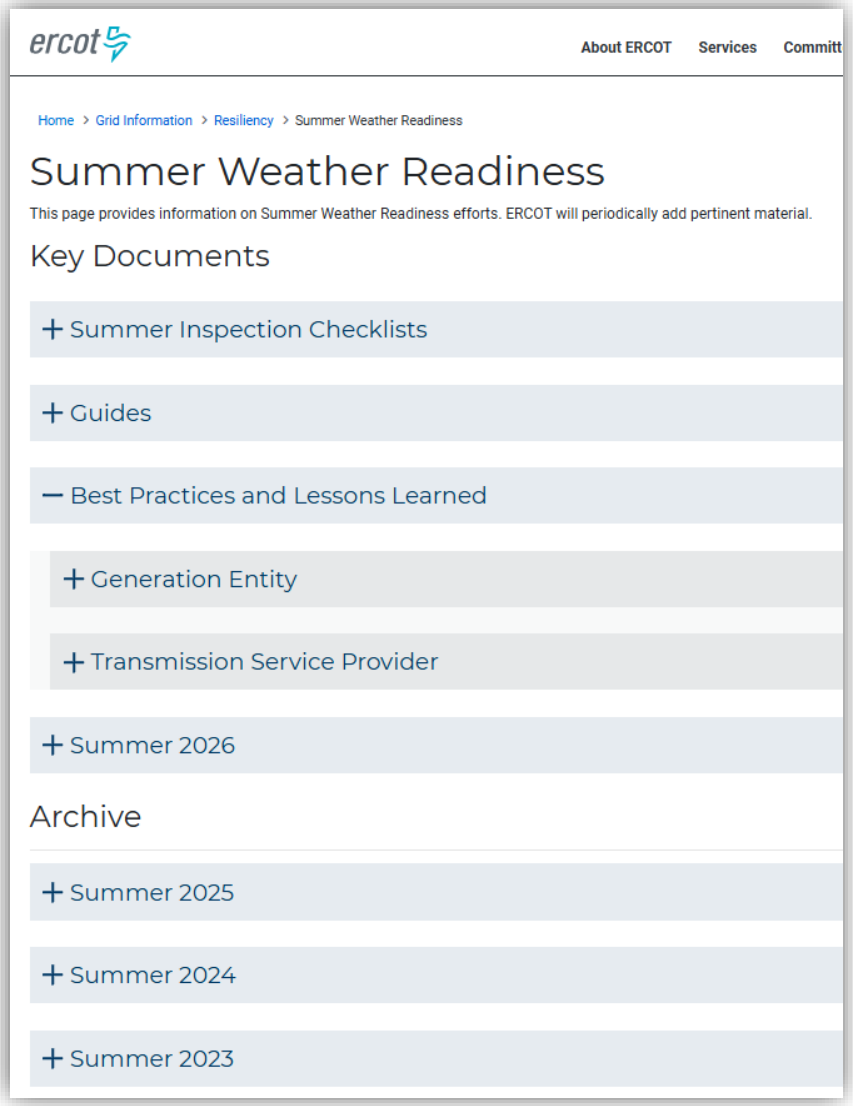
Workshops & Webinars

- W&I Market Participant (MP) Workshops
  - Held in April and October before each inspection season
- Submitting a Declaration Q&A sessions
  - During the declaration submission period in May and November
  - **Winter 2026: November 2, 10, 18, and 30**
    - Visit the ERCOT Calendar for details and Webex links
- Individual technical assistance meetings as needed
- Getting Started with Weatherization & Inspection Compliance in ERCOT

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Winter & Summer Weather Readiness Webpages







Agenda:

Part 1: Overview of the Weatherization and Inspection Program

- ✓ Public Utility Commission of Texas Weather Emergency Preparedness rule, 16 Texas Administrative Code §25.55
- ✓ Weatherization & Inspection Market Participant Portal
- ✓ Process for Submitting a Declaration of Weather Preparedness
- ✓ Helpful W&I Resources

Part 2: Inspection Process

- **Notice of Inspection (NOI)**
- **Best practices for preparing for an inspection**
- **Inspection compliance deficiencies**
- **Inspection results**

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Getting Started with Weatherization & Inspection Compliance in ERCOT

Matt Holland, Supervisor, Weatherization Inspections

October 29, 2026

Agenda:

- Part 2: ERCOT W&I Inspection Process
  - Notice of Inspection (NOI)
  - Best Practices for Preparing for an Inspection
  - Inspection Compliance Deficiencies
  - Inspection Results

How are Resource and substations/switchyards selected for Inspection?

Core Requirement

- **Resources:** interconnected to the ERCOT power region must be inspected at least once every three years.
- **Substations or Switchyards**: at least ten percent to be inspected at least once every three years.

In consultation with Public Utility Commission of Texas (PUCT) staff, ERCOT determines the number, extent, and content of all inspections.

16 TAC §25.55(d)(1) states,
"…every resource interconnected to the ERCOT power region must be inspected at least once every three years."

16 TAC §25.55(g)(1) states,
"…at least ten percent of substations or switchyards providing transmission service to be inspected at least once every three years."

Prioritization of Inspections

ERCOT may prioritize facilities based on various risk factors. These factors include, but are not limited to:

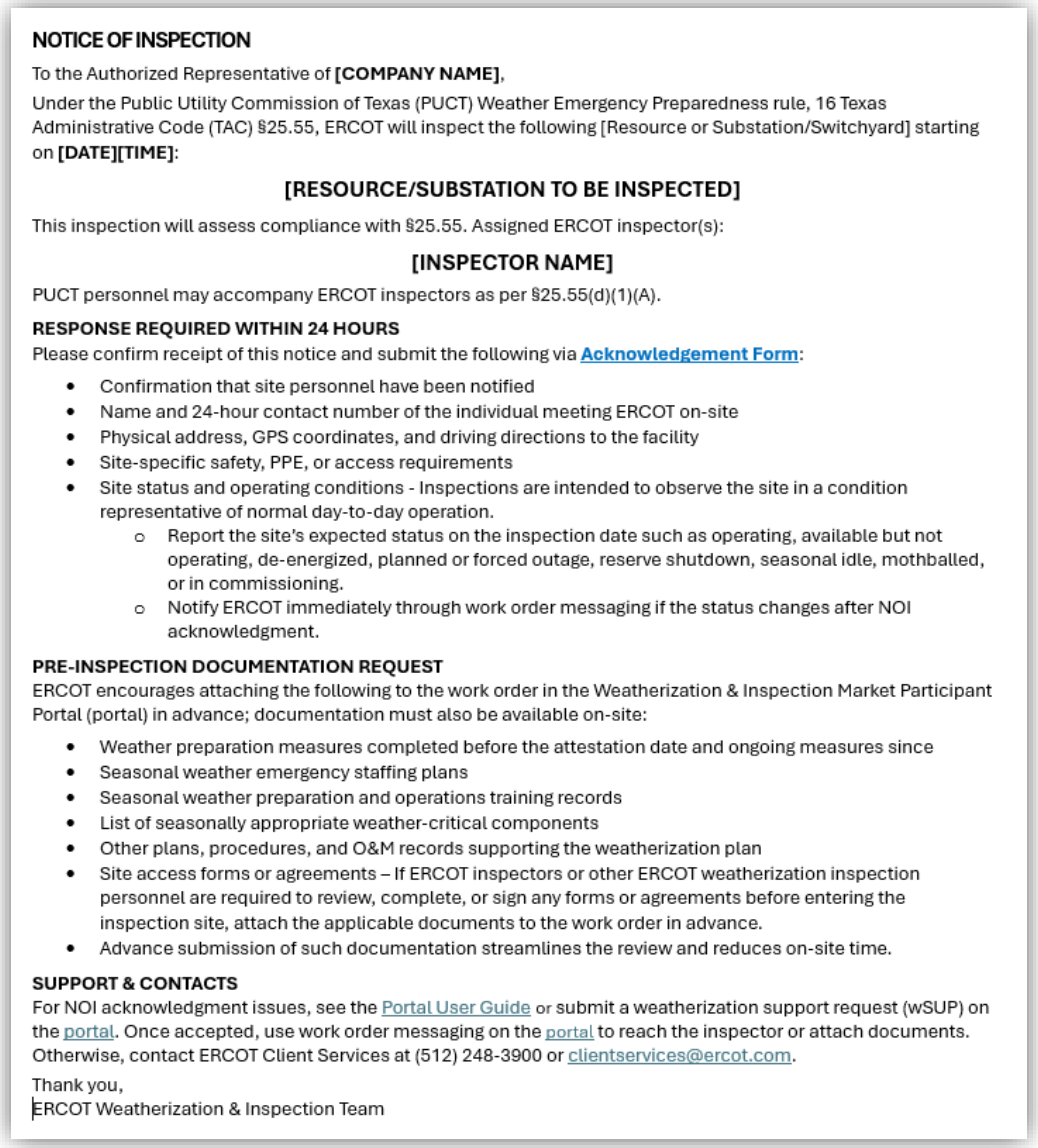
- Whether a facility is critical for electric grid reliability.
- A history of forced outages, forced derates, or failures to start related to weather emergency conditions.
- Programmatic concerns: Other identified vulnerabilities to weather emergencies.

Key Takeaway: ERCOT is required to inspect every resource and at least ten percent of substations/switchyards at least once every 3 years and uses a risk-based approach, developed in consultation with the commission staff, to prioritize inspection scheduling.

How are inspections communicated to Market Participants?

Notice of Inspection (NOI)

- ERCOT provides a written Notice of Inspection (NOI) at least 72 hours before the inspection date.
- The NOI email is sent from ercot@servicenowservices.com to the GE's Authorized Representative (AR) and Backup Authorized Representative (BAR).
  - Please add ercot@servicenowservices.com to your safe sender's list to prevent the NOI from going to a junk or spam folder.
  - Consider utilizing an email rule to route all correspondence from ercot@servicenowservices.com to additional internal email inboxes for plant management or compliance personnel.



NOTICE OF INSPECTION

To the Authorized Representative of **[COMPANY NAME]**,

Under the Public Utility Commission of Texas (PUCT) Weather Emergency Preparedness rule, 16 Texas Administrative Code (TAC) §25.55, ERCOT will inspect the following [Resource or Substation/Switchyard] starting on **[DATE][TIME]**:

[RESOURCE/SUBSTATION TO BE INSPECTED]

This inspection will assess compliance with §25.55. Assigned ERCOT inspector(s):

[INSPECTOR NAME]

PUCT personnel may accompany ERCOT inspectors as per §25.55(d)(1)(A).

RESPONSE REQUIRED WITHIN 24 HOURS

Please confirm receipt of this notice and submit the following via **Acknowledgement Form**:

- Confirmation that site personnel have been notified
- Name and 24-hour contact number of the individual meeting ERCOT on-site
- Physical address, GPS coordinates, and driving directions to the facility
- Site-specific safety, PPE, or access requirements
- Site status and operating conditions - Inspections are intended to observe the site in a condition representative of normal day-to-day operation.
  - Report the site's expected status on the inspection date such as operating, available but not operating, de-energized, planned or forced outage, reserve shutdown, seasonal idle, mothballed, or in commissioning.
  - Notify ERCOT immediately through work order messaging if the status changes after NOI acknowledgment.

PRE-INSPECTION DOCUMENTATION REQUEST

ERCOT encourages attaching the following to the work order in the Weatherization & Inspection Market Participant Portal (portal) in advance; documentation must also be available on-site:

- Weather preparation measures completed before the attestation date and ongoing measures since
- Seasonal weather emergency staffing plans
- Seasonal weather preparation and operations training records
- List of seasonally appropriate weather-critical components
- Other plans, procedures, and O&M records supporting the weatherization plan
- Site access forms or agreements – If ERCOT inspectors or other ERCOT weatherization inspection personnel are required to review, complete, or sign any forms or agreements before entering the inspection site, attach the applicable documents to the work order in advance.
- Advance submission of such documentation streamlines the review and reduces on-site time.

SUPPORT & CONTACTS

For NOI acknowledgment issues, see the Portal User Guide or submit a weatherization support request (wSUP) on the portal. Once accepted, use work order messaging on the portal to reach the inspector or attach documents. Otherwise, contact ERCOT Client Services at (512) 248-3900 or clientservices@ercot.com.

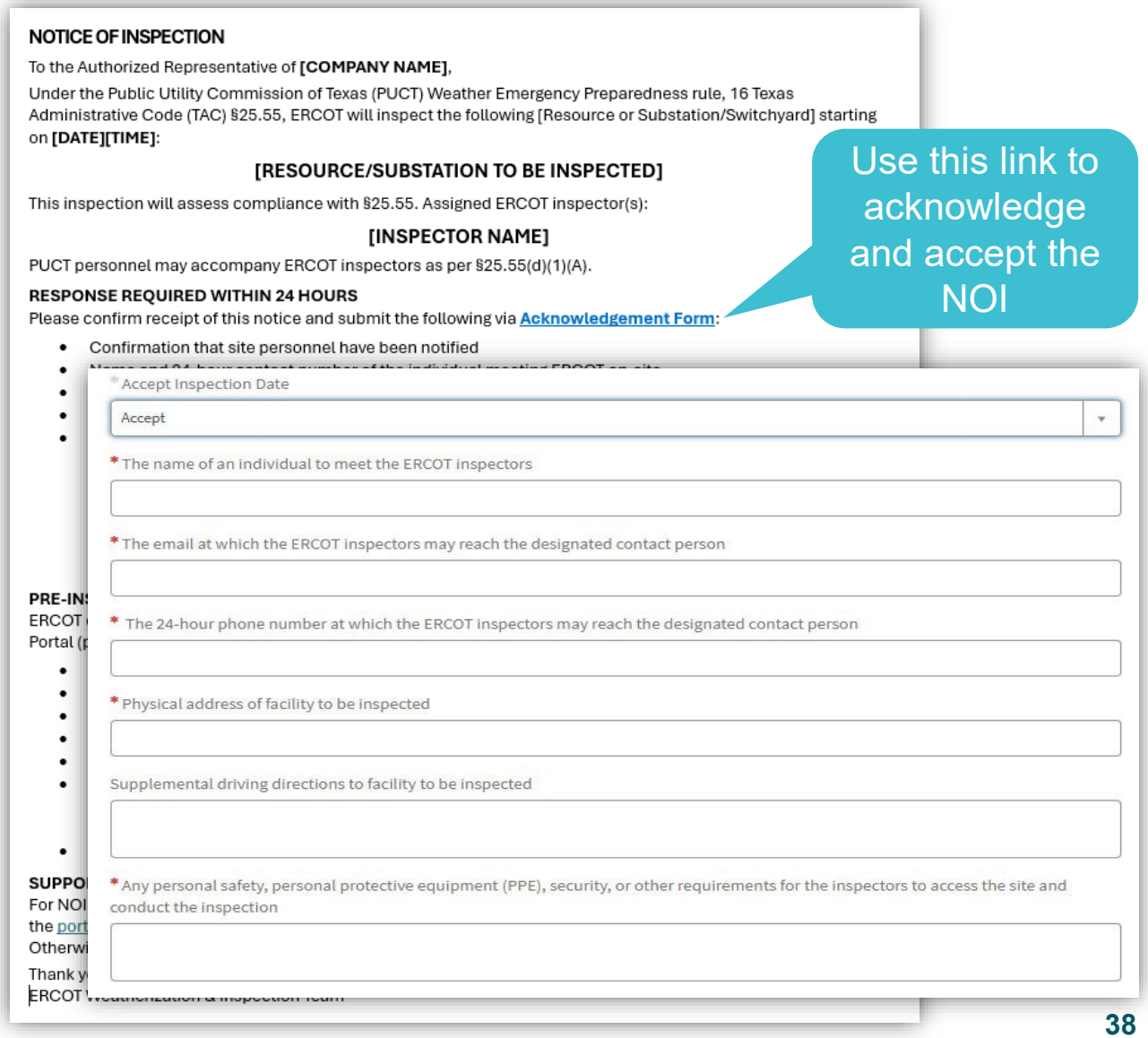
Thank you,
ERCOT Weatherization & Inspection Team

How are inspections communicated to Market Participants?

Acknowledging the Notice

- The NOI must be acknowledged within 24 hours per 16 TAC §25.55(d)(1)(A).
- Acknowledgement requires a representative with a digital certificate and the portal manager role, SN_M_W_MGR_ECEII.
- The notice must be acknowledged using the unique link provided in the NOI email.
  - The NOI is not accessible directly on the portal.

Key Takeaway: Upon receiving a Notice of Inspection (NOI), you have a strict 24-hour deadline to acknowledge it using the unique link provided in the email.



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What are some best practices to prepare for an inspection?

Communicate Proactively

- Use the inspection work order on the portal to communicate with the ERCOT inspector.
- Coordinate with all relevant internal staff, both on-site and off-site.

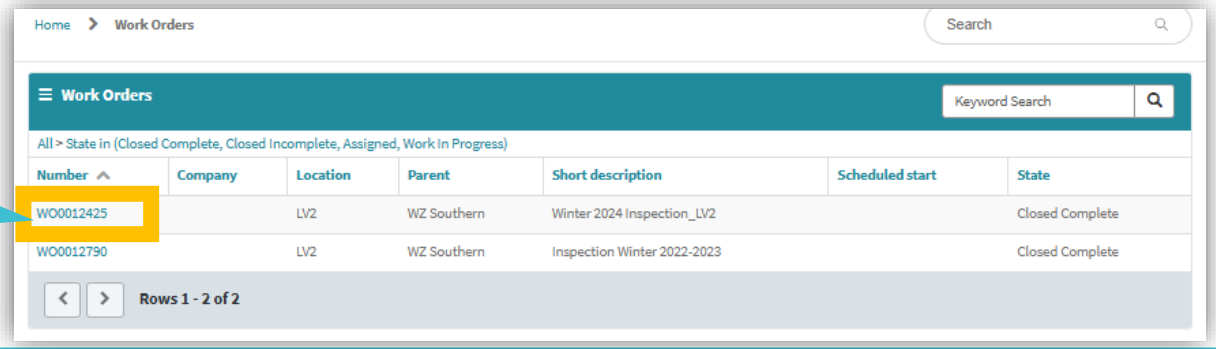
Review Key Documents

- Review the PUCT rule, 16 TAC §25.55.
- Review the GE Winter Inspection Checklist and GE Summer Inspection Checklist developed by ERCOT.

Prepare and Share Documentation

- Attach documentation to the inspection work order prior to the inspection to improve efficiency and reduce on-site inspection time.
- Examples of documents to provide prior to the inspection: hot and cold weather critical component lists, training materials and records, maintenance records and operator logs, weatherization procedures, staffing plans, etc.

Click on the work order number to access the messaging system and document attachment feature



Key Takeaway: Proactively communicating with the inspector and submitting required documentation through the portal *before* the on-site visit is the most effective way to ensure an efficient inspection.

What can be expected during an inspection?

Arrival

- The inspector checks in with the designated site contact upon arrival.
- The inspector holds an initial meeting to make introductions and confirm safety requirements.

Documentation Review

- The inspector reviews documentation that is available on-site and that was provided prior to the inspection on the portal.

Site Walkthrough

- The inspector will focus on compliance by:
  - Examining weather-critical components for readiness.
  - Assessing the condition of insulation, enclosures, and heating/cooling systems.
  - Comparing on-site observations with submitted documentation.
  - Interviewing staff about procedures, staffing coverage, maintenance cycles, and responses to extreme weather.

Wrap-Up

- Before leaving, the inspector will summarize key findings and note any immediate concerns.

Key Takeaway: The on-site inspection is a verification process where inspectors will compare your prepared documentation and records against the physical condition and readiness of your facility's weather-critical components.

Example of the Winter GE Inspection Checklist

Generation Entity Winter Inspection Checklist

Public Utility Commission of Texas (PUCT) Weather Emergency Preparedness 16 Texas Administrative Code (TAC) §25.55	Yes	No	N/A
1.) 16 TAC §25.55(c)(1)(A)(i)			
By December 1, records of installation and maintenance of adequate wind breaks for resources susceptible to outages or derates caused by wind			
Records of maintenance of adequate wind breaks throughout the winter season and completion of any ongoing or monthly requirements at the appropriate time			
2.) 16 TAC §25.55(c)(1)(A)(ii)			
By December 1, records of installation and maintenance of insulation and enclosures for all cold weather critical components (CWCC)			
Records of maintenance of insulation and enclosures for all CWCC throughout the winter season and completion of any ongoing or monthly requirements at the appropriate time			
3.) 16 TAC §25.55(c)(1)(A)(iii)			
By December 1, records it has inspected and repaired existing thermal insulation and associated forms of waterproofing for damage or degradation for all CWCC			
Records of inspection and maintenance of existing thermal insulation and associated forms of waterproofing for damage or degradation for all CWCC throughout the winter season and completion of any ongoing or monthly requirements			
4.) 16 TAC §25.55(c)(1)(A)(iv)			
By December 1, records of arranging and providing for the availability and appropriate safekeeping of: Sufficient chemicals			
By December 1, records of arranging and providing for the availability and appropriate safekeeping of: Auxiliary fuels			
By December 1, records of arranging and providing for the availability and appropriate safekeeping of: Other materials			
Records of arranging and providing for the availability and appropriate safekeeping of such materials necessary for sustained operations during a winter weather emergency throughout the winter season and completion of any ongoing or monthly requirements			
5.) 16 TAC §25.55(c)(1)(A)(v)			
By December 1, records of monitoring, planning, and maintenance of the operability of instrument air (IA) moisture prevention systems			
Records of monitoring, planning, and maintenance of IA moisture prevention system throughout the winter season and completion of any ongoing or monthly requirements			
6.) 16 TAC §25.55(c)(1)(A)(vi) Part 1			
By December 1, records of maintaining freeze protection equipment for: all CWCC			
By December 1, records of maintaining freeze protection equipment for: Fuel delivery systems controlled by the Generation Entity (GE)			
7.) 16 TAC §25.55(c)(1)(A)(vi) Part 2			
By December 1, records of testing and verifying functionality of freeze protection equipment			
Records of testing and verifying functionality of freeze protection equipment monthly during the winter season			
8.) 16 TAC §25.55(c)(1)(A)(vii)			
By December 1, records of monitoring: All CWCC			
By December 1, records of monitoring: Circuitry that provides freeze protection			
By December 1, records of monitoring: Circuitry that prevents IA moisture			
9.) 16 TAC §25.55(c)(1)(B) Part 1			
By December 1, records demonstrating that the GE's existing weather emergency preparation measures are adequate to meet (c)(1)(B); Method of demonstration may be 1.) wind chill value calculated from the design basis cold temperature and the design basis wind speed, 2.) historical operational data, or 3.) other; if other, confer with W&I management after inspection			
10.) 16 TAC §25.55(c)(1)(B) Part 2 (only if part 1 not used)			
By December 1, records demonstrating GE implemented additional weather emergency preparation measures to meet (c)(1)(B)			
11.) 16 TAC §25.55(c)(1)(C)			
By December 1, records of reviewing adequacy of staffing plans for a winter weather emergency			
By December 1, if appropriate, revised staffing plans			
12.) 16 TAC §25.55(c)(1)(D)			
By December 1, records of training relevant operational personnel* on winter weather preparations and operations			
13.) 16 TAC §25.55(c)(1)(E)			
By December 1, list of all cold weather critical components (CWCC)			
Process to review list at least annually by December 1			
Process to update list as necessary			
14.) 16 TAC §25.55(c)(1)(A)			
Does the GE have records it implemented weather emergency preparation measures that could reasonably be expected to ensure the sustained operation of all CWCC during winter weather conditions using either personnel or automated systems where appropriate?			
15.) 16 TAC §25.55(d)(2)(B)(i)			
If the GE has not complied with any part of 25.55(c)(1), confer with the GE on a suggested cure period to address identified deficiencies and document accordingly. The weatherization team will discuss the factors, determine an appropriate cure period, and inform the GE of the cure period.			

*ERCOT interprets "relevant operational personnel" as used in 16 TAC §25.55(c)(1)(D), (c)(2)(D), (f)(1)(D), and (f)(2)(D) as, "*Any relevant personnel directly responsible for implementing, maintaining, or overseeing the weather preparations and operations measures, or taking action as part of the weather response in accordance with §25.55 Weather Emergency Preparedness.*"

Example of the Winter TSP Inspection Checklist

Transmission Service Provider Winter Inspection Checklist

Public Utility Commission of Texas (PUCT) Weather Emergency Preparedness 16 Texas Administrative Code (TAC) §25.55	Yes	No	N/A
1.) 16 TAC §25.55(f)(1)(A)(i)			
By December 1, records confirming the operability of all systems and subsystems containing all cold weather critical components (CWCC) prior to winter season			
Records confirming operability throughout the winter season and completion of any ongoing requirements at the appropriate time			
2.) 16 TAC §25.55(f)(1)(A)(ii) Part 1			
By December 1, records confirming that the sulfur hexafluoride (SF6) gas in breakers and metering and other electrical equipment is at the correct pressure and temperature prior to winter season			
Records confirming that above equipment is at the correct pressure and temperature throughout the winter season			
3.) 16 TAC §25.55(f)(1)(A)(ii) Part 2			
By December 1, records of performing annual maintenance that tests SF6 breaker heaters and supporting circuitry to assure that they are functional			
4.) 16 TAC §25.55(f)(1)(A)(iii) Part 1			
By December 1, records confirming the operability of power transformers and auto transformers in winter weather emergencies by: Inspecting heaters in the control cabinets			
By December 1, records confirming the operability of power transformers and auto transformers in winter weather emergencies by: Verification that main tank oil levels are appropriate for actual oil temperature			
By December 1, records to confirm the operability of power transformers and auto transformers in winter weather emergencies by: Inspecting bushing oil levels			
By December 1, records to confirm the operability of power transformers and auto transformers in winter weather emergencies by: Inspecting the nitrogen pressure (if necessary)			
By December 1, records to confirm the operability of power transformers and auto transformers in winter weather emergencies by: Verification of proper oil quality such that moisture and dissolved gases are within acceptable ranges for winter weather conditions			
5.) 16 TAC §25.55(f)(1)(A)(iii) Part 2			
Records to confirm the operability of power transformers and auto transformers throughout the winter season by: Inspecting heaters in the control cabinets			
Records to confirm the operability of power transformers and auto transformers throughout the winter season by: Verification that main tank oil levels are appropriate for actual oil temperature			
Records to confirm the operability of power transformers and auto transformers throughout the winter season by: Inspecting bushing oil levels			
Records to confirm the operability of power transformers and auto transformers throughout the winter season by: Inspecting the nitrogen pressure (if necessary)			
Records to confirm the operability of power transformers and auto transformers throughout the winter season by: Verification of proper oil quality such that moisture and dissolved gases are within acceptable ranges for winter weather conditions			
6.) 16 TAC §25.55(f)(1)(B) Part 1			
By December 1, records demonstrating that the TSP's existing weather emergency preparation measures are adequate to meet (f)(1)(B). Method of demonstration may be 1) a wind chill value calculated from the design basis cold temperature and the design basis wind speed, 2) historical operational data, or 3) other; if other, confer with W&I management after inspection.			
7.) 16 TAC §25.55(f)(1)(B) Part 2 (only if part 1 not used)			
By December 1, records demonstrating TSP implemented additional weather emergency preparation measures to meet (f)(1)(B).			
8.) 16 TAC §25.55(f)(1)(C)			
By December 1, records of reviewing adequacy of staffing plans for a winter weather emergency, and if appropriate, revised staffing plans			
9.) 16 TAC §25.55(f)(1)(D)			
By December 1, records of training relevant operational personnel* on winter weather preparations and operations			
10.) 16 TAC §25.55(f)(1)(E)			
By December 1, list of cold weather critical components (CWCC)			
Process to review list at least annually by December 1			
Process to update list as necessary			
11.) 16 TAC §25.55(f)(1)(A)			
Does the TSP have records it implemented weather emergency preparation measures that could reasonably be expected to ensure the sustained operation of all CWCC during winter weather conditions using either personnel or automated systems where appropriate?			
12.) 16 TAC §25.55(g)(2)(B)			
If the TSP has not complied with any part of 25.55(f)(1), confer with the TSP on a cure period to address identified deficiencies and document accordingly. The weatherization team will discuss factors, determine an appropriate cure period, and inform the TSP of the cure period.			

*ERCOT interprets "relevant operational personnel" as used in 16 TAC §25.55(c)(1)(D), (c)(2)(D), (f)(1)(D), and (f)(2)(D) as, "*Any relevant personnel directly responsible for implementing, maintaining, or overseeing the weather preparations and operations measures, or taking action as part of the weather response in accordance with §25.55 Weather Emergency Preparedness.*"

Weather Critical Components

Per 16 TAC §25.55(b)(11)
Weather critical component--Any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as intended or, for a resource, is likely to lead to a trip, derate of more than five percent of the capacity represented in the resource's seasonal net maximum sustainable rating or of the transmission facility's rating, or failure to start.

Sample Cold Weather Critical Component (CWCC) Lists

The ERCOT Weatherization & Inspection team provides these lists as samples of potential Cold Weather Critical Components for various types of power generation and transmission facilities. The lists are not intended to be exhaustive nor mandatory but rather represent devices, equipment, components, and systems that ERCOT believes meet the definition of "weather critical component" in 16 TAC §25.55(b)(11) ("any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is like to significantly hinder the ability of the resource or transmission facility to function as intended . . .")

In accordance with 16 TAC §25.55(c)(1)(E) and 16 TAC §25.55(f)(1)(E), generation entities and Transmission Service Providers (TSPs) must create a list of *cold* weather critical components, review it annually prior to the beginning of the winter season, and update it as necessary.

Nuclear, Coal, and Natural Gas Fired Generators with Steam Cycles	Gas Turbines Without Steam Cycles	Reciprocating Engines	Hydroelectric Facilities	Intermittent Renewable Resources	Transmission Service Provider (TSP)
Inlet air heating systems, if applicable	Inlet air heating systems, if applicable	Knock sensing line, sim(s)	Battery systems	Inverters and medium voltage transformers	Autotransformers
Feed, circulating, and seal water systems	Compressor bleed valves	SCR, emissions control	Water management systems	HVAC systems for inverters, control panels, etc.	Power transformers
Natural gas supply including duct burner systems	Instrument air systems	Main gas supply valve	SF6 breakers (controlled by the Resource)	SF6 breakers (controlled by the Resource)	SF6 breakers
SF6 breakers (controlled by the Resource)	SF6 breakers (controlled by the Resource)	SF6 breakers (controlled by the Resource)	Main, step-up, auxiliary, and standby transformers	Main, step-up, auxiliary, and standby transformers	Static var compensators
Main, step-up, auxiliary, and standby transformers	Main, step-up, auxiliary, and standby transformers	Main, step-up, auxiliary, and standby transformers	Air circulation fans	Feeder breakers	Emergency generators at substations, as applicable
Solid, liquid, and gaseous fuel delivery systems (controlled by the Resource)	Control house and other HVAC systems	Control house and other HVAC systems	Control house and other HVAC systems	Wind pad mounted transformer	Control house and other HVAC systems
Control house and other heating, ventilation, and air conditioning (HVAC) systems	Instrument air transmitters	Instrument air systems	Heating systems • GPU (governor control systems) heaters • Other heater	Down tower cabinet assembly heaters	Transmission voltage circuit breaker mechanisms that use pneumatic or hydraulic pressure to operate the contacts open, closed, or both
Coal reclaim equipment, conveyors, crushers, and storage bins	Auxiliary cooling water transmitters	Starting air compressors		Hydraulic and lube oil system	Station batteries
Forced, induced draft, primary air and other fan systems	Dew point analyzer			HVAC for control house and battery container	Grounding transformers
Seal oil systems	Main gas supply valve			Fire suppression system	
Flue gas desulfurization (FGD) systems/scrubbers, fly ash and bottom ash handling systems, selective catalytic reduction (SCR) systems, and other air quality control (AQC) systems	Sprint or NOx control			Wind (if present) • Wind vane and anemometer heating elements • Pad-mounted transformer heaters • Hydraulic pitch system accumulators and associated heating • Gearbox oil heating and circulation systems • Converter cooling system anti-freeze protection	
Demineralized and other water systems, caustic, and sulfuric acid	Coalescing filter			Solar (if present) • Inverter heating and cooling systems • Tracking system motors and gearboxes	

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Key Takeaway: The ERCOT Weatherization and Inspection team provides these lists as samples of potential Cold Weather Critical Components. These lists are not intended to be exhaustive nor mandatory.

What can be expected after an inspection?

Inspection Report

- Market Participants receive a written inspection report attached to the inspection work order.
- This is *typically* delivered within **2** weeks of the on-site inspection.
- The report addresses whether the entity has complied with the requirements in subsection (c)(1), (c)(2), (f)(1), or (f)(2) of 16 TAC §25.55.

Handling Compliance Deficiencies

- ERCOT collaborates with the Market Participant to address identified deficiencies.
- If a deficiency cannot be resolved within **3** business days after the day it is identified, ERCOT will provide a reasonable cure period.
- Deficiencies requiring a cure period are monitored via a 'Cure Period Task' (CPTSK) in the work order.
- MPs with an active CPTSK must submit progress reports within the CPTSK no later than the 15th and last day of each month until the deficiency is determined to be remedied.
- ERCOT is required to report to commission staff any generation entity that does not remedy the deficiencies identified within the cure period determined by ERCOT.

Key Takeaway: Following an inspection, you will receive an inspection report; any identified compliance deficiencies are assigned a monitored cure period, and failure to meet that deadline will be reported to the PUCT.

The Weatherization Inspection Process at a Glance

Before an Inspection

Notification & Preparation

- At least 72 hours prior: ERCOT issues a Notice of Inspection (NOI).
- Within 24 hours: The RE/TSP must acknowledge the NOI.
- Prior to inspection: RE/TSP share documents via the Weatherization & Inspection Market Participant portal.
- Inspector reviews documents and confirms site logistics.

During an Inspection

On-Site Inspection

- Arrival: Inspector checks in and holds an initial meeting.
- Execution: Inspector conducts a documentation review and a physical site walkthrough, comparing records to field conditions.
- Exit: Inspector provides a summary of findings before leaving the site.

After an Inspection

Reporting & Follow-Up

- Within 2 weeks (typically): RE/TSP receives the final inspection report via the inspection work order on the portal.
- If applicable: An RE/TSP with an unresolved compliance deficiency is provided with a cure period. The RE/TSP reports progress to ERCOT semi-monthly and ERCOT tracks to resolution.

Key Takeaway: The inspection is a structured, end-to-end process that moves from official notification and preparation, through an on-site verification, to a final report and compliance follow-up.

Most Frequent Compliance Deficiencies for Resources

The following areas have been the most common sources of compliance deficiencies, referencing 16 TAC §25.55:

Freeze Protection Maintenance - (c)(1)(A)(vi):

- Failure to adequately maintain, test, or verify the functionality of freeze protection equipment for cold weather critical components prior to and monthly during the winter season.

Instrument Air Systems - (c)(1)(A)(v):

- Inadequate plans or maintenance for the operability of instrument air moisture prevention systems.

Weather Critical Component Maintenance - (c)(1)(A)(v) and (c)(2)(A)(v):

- Failure to maintain weather critical components, like cooling systems, or verify their functionality prior to and monthly during the season.

Insulation & Enclosures - (c)(1)(A)(ii):

- Improper installation or maintenance of insulation and enclosures for cold weather critical components.

Personnel Training Records - (c)(1)(D) and (c)(2)(D):

- Failure to provide adequate records of training for relevant operational personnel on winter or summer weather preparations and operations.

Most Frequent Compliance Deficiencies for Substations/Switchyards

The following areas have been the most common sources of compliance deficiencies, referencing 16 TAC §25.55:

Winter Transformer Operability- (f)(1)(A)(iii)(I):

- Failure to inspect heaters in the control cabinets.

Winter Transformer Operability- (f)(1)(A)(iii)(V):

- Failure to verify proper oil quality such that moisture and dissolved gases are within acceptable ranges for winter weather conditions.

Personnel Training Records - (f)(1)(D) and (f)(2)(D):

- Failure to provide adequate records of training for relevant operational personnel on winter or summer weather preparations and operations.

Weather Critical Component List - (f)(1)(E) and (f)(2)(E):

- Failure to create a list of all cold and hot weather critical components, review the list at least annually prior to the beginning of the season, and update the list as necessary.

Insulation & Enclosures - (f)(2)(A):

- Implement weather emergency preparation measures that could reasonably be expected to ensure the sustained operation of all hot weather critical components during summer weather conditions. .



Agenda:

Part 1: Overview of the Weatherization and Inspection Program

- ✓ Public Utility Commission of Texas Weather Emergency Preparedness rule, 16 Texas Administrative Code §25.55
- ✓ Weatherization & Inspection Market Participant Portal
- ✓ Process for Submitting a Declaration of Weather Preparedness
- ✓ Helpful W&I Resources

Part 2: Inspection Process

- ✓ Notice of Inspection (NOI)
- ✓ Best practices for preparing for an inspection
- ✓ Inspection compliance deficiencies
- ✓ Inspection results



Questions/ Comments?

We welcome your feedback!

Let us know if this session met your needs, what worked well, and what could be improved.

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