

From: Karen Freeman <info@email.actionnetwork.org>
Sent: Saturday, October 30, 2021 1:26 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Railroad Commission of Texas ,

I am writing to comment on the proposed rule for 16 TAC §3.65 and §3.107 (new rule and amendment per SB 3 and HB 3648).

This February, Winter Storm Uri caused massive power outages across Texas that led to hundreds of deaths and estimated damages of up to \$295 billion - making it the costliest natural disaster in Texas history. A preliminary assessment by the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation (NERC) found that natural gas fuel supply issues were the second largest cause of outages and derates at electric generators, other than electric generator freezing issues.

After the 2011 winter power outages, FERC and NERC released a similar report recommending winterization strategies for the natural gas supply chain. The RRC did not issue any rulemakings to weatherize the natural gas supply chain. Please don't make the same mistakes again.

The proposed critical infrastructure rulemaking leaves Texans vulnerable to more widespread power outages, deaths, and billions in damages. First, the rule draft would allow any operator to apply for an exception to "critical infrastructure" designation. The rule does not specify any criteria that would allow the railroad to reject an application for an exception. This is extremely important, because facilities that are not designated as critical infrastructure will not be required to comply with future weatherization rules.

Next, the rule seems to apply only to natural gas facilities that are connected to the grid. Many natural gas wells are not connected to power from the grid, but are still necessary fuel sources for the gas supply chain. Facilities that are not connected to the grid, but are supplying electric generators should still be considered critical so that they will be subject to future weatherization requirements.

The proposed rule is also problematic because it allows any natural gas facility to be designated as critical, even if it doesn't supply gas to an electric generator. This could result in more Texas residents being left without power when demand exceeds supply because utilities will prioritize critical infrastructure. Many utilities were already unable to rotate power outages during Winter Storm Uri. The Commission needs to map the natural gas supply chain to determine which facilities are actually critical and therefore need to be prioritized. As it stands, this rule could result in limited electricity supply being provided to non-critical industry improperly designated as critical.

Finally, Senate Bill 3 presented challenges for the RRC because it requires facilities to be prepared to operate in a weather emergency in order to be designated as critical infrastructure. However, facilities that aren't designated as critical will never be required to follow the RRC's weatherization rule. The RRC's impractical interpretation of SB 3 leaves Texans vulnerable. Please consider a phased approach to ensure that all gas facilities that supply fuel to electric generators are required to be considered as critical infrastructure and are held accountable to future weatherization rules.

Don't make critical infrastructure designation and weatherization rules optional. Texans are counting on the RRC to ensure grid reliability by finalizing meaningful gas supply chain weatherization rules.

Karen Freeman
kfreemanrn@gmail.com
Rustling Meadows
san antonio, Texas 78254

[REDACTED]

From: Sandi Hebley [REDACTED]
Sent: Sunday, October 31, 2021 9:39 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Sandi Hebley
shebley@airmail.net

, Texas

From: VOTE OUT TRUMPIKKKANS INVESTIGATE THEIR DARK MONEY
<info@email.actionnetwork.org>
Sent: Saturday, October 30, 2021 1:26 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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VOTE OUT TRUMPIKKKANS INVESTIGATE THEIR DARK MONEY

slw94c@gmail.com

7061 Limerick Lane

Powell, Ohio 43065

From: a.holland714@everyactioncustom.com on behalf of Alexandra Holland <a.holland714@everyactioncustom.com>
Sent: Saturday, October 30, 2021 8:47 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Dear Texas Railroad Commission,

To whom it may concern,

My name is Alex and I live in Plano, TX. Like many other Texans, we were affected by the freeze back in February. Although my brother's apartment flooded as a result of burst water lines, we were lucky that this was the only damage we took. Others, however, were not so lucky.

After last winter's storms, the Texas legislature required the Railroad Commission and the PUC to assure that the gas wells, pipelines and generating plants were winterized so that we don't face another big blackout. A recent FERC investigation noted that gas fuel supply issues were the second largest cause of outages, other than electric generator freezing issues. It's critical that all the gas wells, pipelines, and parts of the gas supply chain are prepared to operate in winter storms.

This is serious. Hundreds of people died as a result of power outages in February, and the disaster cost Texans hundreds of billions of dollars in damages. We are counting on the railroad commission to provide strong rules and strict oversight to make sure this doesn't happen again.

One of the key failures identified after the storm was that the gas compressors had failed to identify themselves as critical infrastructure that should not be turned off in a rolling blackout by the electric utilities that serve them. The RRCs current proposed rule language allows any operator to opt-out of "critical infrastructure" designation. Any operator that opts out will not be required to weatherize. I want to see all operators that supply gas to electric generation facilities classified as critical infrastructure.

The proposed rule also only applies to gas facilities that receive power from the grid. Many gas wells are not connected to the grid but are still an important part of the fuel supply chain. All gas facilities that supply electric generators need to be weatherized.

Sincerely,
Alexandra Holland
3616 Piedmont Dr Plano, TX 75075-6235
a.holland714@gmail.com

From: genevievebuentello@everyactioncustom.com on behalf of Genevieve Buentello <genevievebuentello@everyactioncustom.com>
Sent: Saturday, October 30, 2021 8:55 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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SO instead of griping about transgender athletes, Joe Biden, or whatever other petty distractions that politicians focus on, can we do something for the people of Texas instead that has life or death consequences????

Sincerely,
Genevieve Buentello
4907 Lambs Ln Austin, TX 78744-5339
genevievebuentello@gmail.com

From: lchannon@everyactioncustom.com on behalf of Lucinda Channon
<lchannon@everyactioncustom.com>
Sent: Saturday, October 30, 2021 11:34 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Lucinda Channon
4000 Colorado Springs Dr Fort Worth, TX 76123-1476 lchannon@gmail.com

From: maria.liya.mar@everyactioncustom.com on behalf of Li-Ya Mar
<maria.liya.mar@everyactioncustom.com>
Sent: Saturday, October 30, 2021 12:28 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Li-Ya Mar
14700 Marsh Ln Apt 528 Addison, TX 75001-8059 maria.liya.mar@gmail.com

From: scoverup2@everyactioncustom.com on behalf of Sheri Lorange <scoverup2@everyactioncustom.com>
Sent: Saturday, October 30, 2021 1:02 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Sheri Lorange
305 Westbend Cir Seguin, TX 78155-4043
scoverup2@gmail.com

From: amyhunt@everyactioncustom.com on behalf of Amy Hunt
<amyhunt@everyactioncustom.com>
Sent: Saturday, October 30, 2021 2:14 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Amy Hunt
10615 Royal Club Ln Dallas, TX 75229-5048 amyhunt@swbell.net

From: jchapmanrgv@everyactioncustom.com on behalf of Jim Chapman
<jchapmanrgv@everyactioncustom.com>
Sent: Saturday, October 30, 2021 3:47 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Jim Chapman
200 E 11th St Weslaco, TX 78596-7065
jchapmanrgv@gmail.com

From: madeleinerflee@everyactioncustom.com on behalf of Madeleine Lee
<madeleinerflee@everyactioncustom.com>
Sent: Saturday, October 30, 2021 4:31 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Madeleine Lee
1400 Winding Hollow Ln Plano, TX 75093-4801 madeleinerflee@att.net

From: flamingodale@everyactioncustom.com on behalf of Monte Kay Frederick
<flamingodale@everyactioncustom.com>
Sent: Saturday, October 30, 2021 8:09 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Monte Kay Frederick
FM 672 Dale, TX 78616
flamingodale@gmail.com

From: gsells@everyactioncustom.com on behalf of Greg Sells
<gsells@everyactioncustom.com>
Sent: Saturday, October 30, 2021 8:38 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Greg Sells
3300 Parker Ln Apt 258 Austin, TX 78741-6942 gsells@austin.rr.com

From: peeps4ever@everyactioncustom.com on behalf of Karen Rotzler
<peeps4ever@everyactioncustom.com>
Sent: Sunday, October 31, 2021 8:54 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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One of the key failures identified after the storm was that the gas compressors had failed to identify themselves as critical infrastructure that should not be turned off in a rolling blackout by the electric utilities that serve them. The RRCs current proposed rule language allows any operator to opt-out of "critical infrastructure" designation. Any operator that opts out will not be required to weatherize. I want to see all operators that supply gas to electric generation facilities classified as critical infrastructure.

The proposed rule also only applies to gas facilities that receive power from the grid. Many gas wells are not connected to the grid but are still an important part of the fuel supply chain. All gas facilities that supply electric generators need to be weatherized.

Sincerely,
Karen Rotzler
1819 Eagle Meadoc San Antonio, TX 78248 peeps4ever@gmail.com

From: peeps4ever@everyactioncustom.com on behalf of Will Rotzler
<peeps4ever@everyactioncustom.com>
Sent: Sunday, October 31, 2021 8:56 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Dear Texas Railroad Commission,

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Sincerely,
Will Rotzler
1819 Eagle Mdw San Antonio, TX 78248-1306 peeps4ever@gmail.com

From: patls@everyactioncustom.com on behalf of Pat Schumacher
<patls@everyactioncustom.com>
Sent: Sunday, October 31, 2021 11:10 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Pat Schumacher
5225 Camino De La Tierra Brownsville, TX 78526-9726 patls@netzero.com

From: roberta_powell@everyactioncustom.com on behalf of Roberta Powell
<roberta_powell@everyactioncustom.com>
Sent: Sunday, October 31, 2021 11:36 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Roberta Powell
9610 Quicksilver Dr San Antonio, TX 78245-1238 roberta_powell@yahoo.com

From: cf1744@everyactioncustom.com on behalf of Connie Friend <cf1744@everyactioncustom.com>
Sent: Sunday, October 31, 2021 4:14 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Connie Friend
1805 Waggoner Dr Crossroads, TX 76227-3818 cf1744@gmail.com

From: wright.deborah@everyactioncustom.com on behalf of Deborah Wright
<wright.deborah@everyactioncustom.com>
Sent: Sunday, October 31, 2021 5:23 PM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Dear Texas Railroad Commission,

It's Time to start valuing lives over dollars! After last winter's storms, the Texas legislature required the Railroad Commission and the PUC to assure that the gas wells, pipelines and generating plants were winterized so that we don't face another big blackout. A recent FERC investigation noted that gas fuel supply issues were the second largest cause of outages, other than electric generator freezing issues. It's critical that all the gas wells, pipelines, and parts of the gas supply chain are prepared to operate in winter storms.

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Sincerely,
Deborah Wright
2512 Crestwood Pl Denton, TX 76209-1114 wright.deborah@gmail.com

From: heard.frances@everyactioncustom.com on behalf of Frances Heard
<heard.frances@everyactioncustom.com>
Sent: Saturday, October 30, 2021 8:05 AM
To: Rules Coordinator
Subject: Comments on 16 TAC §3.65 and §3.107 (New rule and amendment per SB 3 and HB 3648)

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Sincerely,
Frances Heard
5607 Carew St Houston, TX 77096-1011
heard.frances@gmail.com

From: Kay Pruett <Kay.Pruett.437724274@p2a.co>
Sent: Saturday, October 30, 2021 7:06 AM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Kay Pruett
1260 Co Rd 153
Purmela, TX 76566

From: Anthony Sanchez <Anthony.Sanchez.180833304@p2a.co>
Sent: Saturday, October 30, 2021 7:07 AM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Anthony Sanchez
1802 Conn Creek Rd
Cedar Park, TX 78613

From: Roy Pruden <Roy.Pruden.121591029@p2a.co>
Sent: Saturday, October 30, 2021 7:46 AM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Roy Pruden
3526 Bellefontaine
Houston, TX 77025

From: Linda Ford <Linda.Ford.83733015@p2a.co>
Sent: Saturday, October 30, 2021 8:00 AM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Linda Ford
540 Park Ln
Richardson, TX 75081

From: Elsa Anzalone <Elsa.Anzalone.477902308@p2a.co>
Sent: Saturday, October 30, 2021 2:41 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Elsa Anzalone
2617 W Holcombe Blvd
Houston, TX 77030

From: Micaela Segal <Micaela.Segal.445407600@p2a.co>
Sent: Saturday, October 30, 2021 4:47 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Micaela Segal
4714 Kinglet St
Houston, TX 77035

From: Valerie Plese <Valerie.Plese.298965065@p2a.co>
Sent: Sunday, October 31, 2021 5:46 AM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Valerie Plese
3883 Turtle Creek Blvd
Dallas, TX 75219

From: Josetta Eveler <Josetta.Eveler.484942847@p2a.co>
Sent: Sunday, October 31, 2021 1:53 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

I thank you, for all you do for us in Texas, and beg you to do all that is necessary to keep us warm this winter. God bless you and your Work for His children, old and young in Texas. The Railroad Commission's current proposed rule language allows any gas operator to opt-out of "critical infrastructure" designation. This creates an easily exploitable loophole that risks repeating another catastrophic failure of our grid and energy supplies. I urge you to require ALL gas operators to weatherize their equipment.

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All gas facilities need to be weatherized.

Regards,
Josetta Eveler
4707 Broadway
San Antonio, TX 78209

From: Connie Urrutia <Connie.Urrutia.484943477@p2a.co>
Sent: Sunday, October 31, 2021 2:03 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

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After last winter's storms, the Texas legislature required the Railroad Commission and the PUC to assure that the gas wells, pipelines, and generating plants were winterized so that we don't face another big blackout. A recent FERC investigation noted that gas fuel supply issues were the second largest cause of outages, other than electric generator freezing issues. It's essential that all the gas wells, pipelines, and parts of the gas supply chain are prepared to operate in extreme weather conditions.

One of the key failures identified after the storm was that the gas compressors had failed to identify themselves as critical infrastructure that should not be turned off in a rolling blackout by the electric utilities that serve them. Any operator that opts out under RRC's proposed rule will not be required to weatherize. The proposed rule also only applies to gas facilities that receive power from the grid. Many gas wells are not connected to the grid but are still an important part of the fuel supply chain. I want to see all operators that supply gas to electric generation facilities classified as critical infrastructure.

Hundreds of people died as a result of power outages in February, and the disaster cost Texans hundreds of billions of dollars in damages. We are counting on the Railroad Commission to provide strong rules and basic oversight to make sure this doesn't happen again.

All gas facilities need to be weatherized.

Regards,
Connie Urrutia
4707 Broadway
San Antonio, TX 78209

From: Kathleen Reynolds <Kathleen.Reynolds.484949129@p2a.co>
Sent: Sunday, October 31, 2021 3:33 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Kathleen Reynolds
140 Elizabeth Rd
Alamo Heights, TX 78209

From: Melinda Fowler <Melinda.Fowler.200564599@p2a.co>
Sent: Sunday, October 31, 2021 9:11 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Melinda Fowler
344 Canna Lily Cir
Driftwood, TX 78619

From: Kent Williams <Kent.Williams.484965167@p2a.co>
Sent: Sunday, October 31, 2021 9:22 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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All gas facilities need to be weatherized.

Regards,
Kent Williams
3100 Oakridge Dr
Temple, TX 76502

From: Michele O'Brien <Michele.O'Brien.484969262@p2a.co>
Sent: Sunday, October 31, 2021 11:11 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

I am writing to request you to close the loopholes that endangers all of the people of TX, old and young, rich and poor to the saga we experienced last winter during the winter weather. The Railroad Commission's current proposed rule language allows any gas operator to opt-out of "critical infrastructure" designation. This creates an easily exploitable loophole that risks repeating another catastrophic failure of our grid and energy supplies. I urge you to require ALL gas operators to weatherize their equipment.

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Regards,
Michele O'Brien
3010 Urban Crest Dr
San Antonio, TX 78209