

From: Jennifer Quick <info@email.actionnetwork.org>
Sent: Monday, November 1, 2021 8:14 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Railroad Commission of Texas ,

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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.

Jennifer Quick
jennifer.quick.h@gmail.com
2011 Arborcrest Dr
Arlington, Texas 76012

From: [REDACTED] <info@email.actionnetwork.org>
Sent: Monday, November 1, 2021 8:58 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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bmarieharper@gmail.com
5935 Pine Needle Ln
Pasadena, Texas 77505

From: [REDACTED]
Sent: Monday, November 1, 2021 3:50 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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gingerj@alumni.rice.edu
9517 Crestlake Dr
Dallas, Texas 75238-2638

[REDACTED]

From: Leisa McCord [REDACTED]
Sent: Monday, November 1, 2021 5:28 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Leisa McCord
leisa@leisamccord.com
1607 Saint Charles St
Houston, Texas 77003-5211

From: Katherine Haun <info@email.actionnetwork.org>
Sent: Monday, November 1, 2021 6:20 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).

I don't want the grid to crash again - maybe even worse next time.
Fix it for real.

Don't make critical infrastructure designation and weatherization rules optional!

Katherine Haun
kawewells@hotmail.com

Houston, Texas 77035

From: [REDACTED] <info@email.actionnetwork.org>
Sent: Monday, November 1, 2021 7:28 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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rbykucw@gmail.com
2000 Garden St
Austin, Texas 78702

From: wildrescuetexas@everyactioncustom.com on behalf of Diana Leggett
<wildrescuetexas@everyactioncustom.com>
Sent: Monday, November 1, 2021 5:24 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,

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,
Diana Leggett
1019 Aileen St Denton, TX 76201-2527
wildrescuetexas@gmail.com

From: hbcbnorman@everyactioncustom.com on behalf of Cary West
<hbcbnorman@everyactioncustom.com>
Sent: Monday, November 1, 2021 8:02 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,
Cary West
1312 Lakeway Burnet, TX 78611-3004
hbcbnorman@gmail.com

From: Allen Bruns [REDACTED]
Sent: Monday, November 1, 2021 4:25 PM
To: Sharon Koren; Rules Coordinator
Subject: Pulic Comment

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Past histories of failure to winterize the production of electricity has shown that the state of Texas bureaucracies will not be responsible. Even if recommendations are submitted for regulation...It does not happen.. The Governor, Texas Railroad Commission and PUC are responsible for regulation of Power Generation and Gas production. Texas Railroad Commission has created Critical Infrastructure Designation - Exception Process for exception of regulation.

If you allow industry to decide how it wants to be regulated...you have given that industry the power to determine its unregulated behavior. Companies are avoiding the costs of winterizing by just paying a small fine.. 150 dollars and not declaring they are not part of the critical infrastructure.

Railroad commission has 6 months to construct regulations.

PUC has 6 months to construct regulations.

This has happened before. Are we just now starting this process? That is not responsible regulation for winterization over our past history.

The Texas Railroad Commission was given 19 million for this purpose... under what requirements ?

Power Generation and Gas Producers don't have to start winterization until early 2022. This is a travesty.

I have formally requested information regarding our winterization status from the Governor and from the Texas Railroad Commission. The Governor has not responded.

The Railroad Commission does not understand the request and only responds by responding a form letter about what the legislature is doing and deadlines for maps.

Please indicate the current (today's) electric and gas production (within winterization readiness) capacity relative to last seasonal storm demands.

Please indicate our current winterization status in percentage of completion and costs with regards to what we need to meet last year's storm requirements.

Give a projected completion date for these winterizations readiness.

Please express this information within critical infrastructure.

How many days does the industry have to comply with winterization regulation ?

Cyrus Reed, Conservation Director for the Lone Star Chapter of the Sierra Club, "Federal agencies identified Texas' non weatherized gas wells as a reason for fuel shortages in 1989, 2003, and 2011, but Texas leaders refused to act. Now, after hundreds of Texans have died, we have a chance to go back to the drawing board and try again -- state regulators owe it to the people of Texas to get this one right

I have no confidence in the Governor's statement...

"Bottom line is that everything that needed to be done was done to fix the power grid in Texas," Gov. Abbott said in June 2021.

If the Railroad Commission and PUC is not transparent with the public ...the public will not trust them and will not be able to hold them to account. Apparently the Legislature also has no concept of these fundamentals.

Thank You

From: Selena Hidalgo <Selena.Hidalgo.478159583@p2a.co>
Sent: Monday, November 1, 2021 12:39 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,

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.

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.

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All gas facilities need to be weatherized.

Regards,
Selena Hidalgo
10311 Country Bluff
San Antonio, TX 78240

From: Kathy Treadway <Kathy.Treadway.485029723@p2a.co>
Sent: Monday, November 1, 2021 12:41 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Kathy Treadway
10311 Country Bluff
San Antonio, TX 78240

From: Corbello Barbara <Corbello.Barbara.478033122@p2a.co>
Sent: Monday, November 1, 2021 1:36 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.

Get your act together now! Totally disgusting for Texans!

Regards,
Corbello Barbara
5322 Manor Creek Ln
Houston, TX 77092

From: Kevin Richardson <Kevin.Richardson.266651545@p2a.co>
Sent: Monday, November 1, 2021 6:07 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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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. 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,
Kevin Richardson
203 N Colson St
Dallas, TX 75246

From: Teresa Stanley <Teresa.Stanley.485028067@p2a.co>
Sent: Monday, November 1, 2021 12:26 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Teresa Stanley
140 Elizabeth Rd
Alamo Heights, TX 78209

From: rrcwebcontact
Sent: Monday, November 1, 2021 4:59 PM
To: Rules Coordinator
Subject: The Form 'Rules Comment Form' was submitted



General Comment

Here is a new comment from the Web.

Comment

Choose Form

16 TAC §3.65 and §3.107

Name

Kathy Wilson

Address

963 Gardenia Dr

City

Houston

State

TX

Zip

77018

Business Phone, Fax

Email Confidentiality Preference

No, I request my e-mail address to remain confidential

Email Address

[REDACTED]

Comments concerning proposed rulemakings

The Proposed Rules include information regarding critical designation, an exception for facilities that are not prepared to operate during weather emergencies, and an application, with associated \$150 fee, for exception. It appears these rules are proposed in order to help ensure energy facilities are prepared to operate during weather emergencies but it's not clear to me what requirements there are for exceptions. Surely it's not intended that facilities need only to apply for an exception to these rules to get it. My comment is that I think these proposed rules should be explicit in what constitutes an exception, and that those requirements should make exception rare and difficult to obtain--all plainly spelled out as opposed to hidden in references (if that's the case).