

[REDACTED]

From: Patricia Webster [REDACTED]
Sent: Saturday, October 23, 2021 1:20 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).

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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.

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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.

Patricia Webster
patrozhammond@att.net
11364 Coral Hills Dr.
Dallas, Texas 75229

From: Neal Ehardt <info@email.actionnetwork.org>
Sent: Saturday, October 23, 2021 3:53 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Neal Ehardt
nealehardt@gmail.com

Houston, Texas 77019

[REDACTED]

From: Sandi Hebley [REDACTED]
Sent: Saturday, October 23, 2021 4:10 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: Micaela Segal <info@email.actionnetwork.org>
Sent: Saturday, October 23, 2021 5:52 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Micaela Segal
micachu87@gmail.com
4714 Kinglet St
Houston, Texas 77035-4924

From: Joel Andre <info@email.actionnetwork.org>
Sent: Sunday, October 24, 2021 1:57 AM
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), and my concern that you have lost your minds.

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, FOR A THIRD TIME!!

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PLEASE 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.

Joel Andre
joel.andre.home@gmail.com
2208 Parkhaven Dr
Plano , Texas 7507t

[REDACTED]

From: Joannes C Laven [REDACTED]
Sent: Sunday, October 24, 2021 8:05 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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I sat in the cold, hungry, thirsty, humiliated, and incommunicado, with words like criminal negligence and negligent homicide looking for the persons on whom to be charged. Are you really almost going to do a partial fix? Are persons and entities going to have to pay out of their own bulging pockets what can so easily be charged to the long-suffering people of Texas?

Gaze upon the circle of boots in the Railroad Commission logo.

Those boots were made for butt-kicking.

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Joannes C Laven
hansl@dcci.com

215-C W. Magnolia Ave
San Antonio, Texas 78212

[REDACTED]

From: Tracy Wallace [REDACTED]
Sent: Sunday, October 24, 2021 8:29 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Tracy Wallace
tracy@greencareersdallas.org
2631 Lakeforest Court
Dallas, Texas 75214

From: Lauren Fenenbock <info@email.actionnetwork.org>
Sent: Sunday, October 24, 2021 2:55 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Lauren Fenenbock
shainablue@gmail.com
519 Mississippi Ave
El Paso, Texas 79902

[REDACTED]

From: Kim Schlossberg [REDACTED]
Sent: Saturday, October 23, 2021 9:14 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Kim Schlossberg
kims@kimmarla.com
1714 MacManus Dr.
DALLAS, Texas 75228

[REDACTED]

From: Zoey Leger-James [REDACTED]
Sent: Sunday, October 24, 2021 11:02 AM
To: Rules Coordinator
Subject: Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

Texans are counting on you to help ensure that we don't have a repeat of last February's deadly winter storm blackouts. State lawmakers asked the Railroad Commission to make rules to ensure that the gas supply chain was weatherized to function during future storms.

Gas fuel supply problems were the second largest cause of outages, after frozen electric generators. That's according to a recent report by the Federal Energy Regulatory Commission (FERC). The FERC report recommended steps to ensure that our natural gas supply is weatherized to survive the next storm. It's up to you to pass strong rules to make that happen.

This current rule proposal allows any operator to simply opt out of weatherizing, even if they normally supply gas to electric generators. The Railroad Commission must act to ensure that operators supplying gas to electric generation facilities are weatherized.

The proposed rule also encourages operators who aren't supplying gas to electric generators to be designated as critical infrastructure. If electricity shortages and rolling power outages are required to keep the grid stable, facilities that are unnecessarily designated as critical infrastructure could actually cause more Texans to go without power.

Please strengthen this rule to avoid a repeat of last winter's tragedy, in which hundreds died and millions were left without power.

Sincerely,
Zoey Leger-James
Balch Springs, TX 75180

From: hou.petsurgeon@everyactioncustom.com on behalf of Laurel Hays
<hou.petsurgeon@everyactioncustom.com>
Sent: Saturday, October 23, 2021 11:45 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,

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. I was without power and heat for nearly 4 days. Luckily I have a gas fireplace. We didn't leave that room the entire time. And our water heater required replacement. 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,
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