

From: robin@everyactioncustom.com on behalf of [Robin Schneider](#)
To: [Rules Coordinator](#)
Subject: New §3.66, Weather Emergency Preparedness Standards (Senate Bill 3, 2021)
Date: Friday, August 12, 2022 11:50:32 AM

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Dear Critical Infrastructure Division Director Jared Ware,

Are you going to protect Texans or the oil and gas industry?

Your weatherization rules need to be strengthened if they are going to protect the delivery of power in times of extreme cold and heat.

As the commission prepares its first major weatherization rule, please consider making the following improvements:

1. Ensure that potential penalties are higher than the potential cost of non-compliance.
2. Encourage operators to come back into compliance swiftly by significantly reducing the "time out of compliance" for each factor value in the penalty classification system.
3. Create a fair and ethical playing field for operators by developing a definition for a "Major weather-related forced stoppage" that is not subjectively determined by RRC staff.
4. Create a process for ensuring that emergency contact information is updated on the Electricity Supply Chain Map in a timely manner. Operators who acquire facilities between critical infrastructure filing deadlines should immediately update the RRC by filing forms CI-D and CI-X for the acquired facilities.
5. Facilitate operator compliance by issuing guidance or a notice to operators clarifying deadlines for filing and implementation, and explaining how RRC will enforce weatherization standards for critical gas supply chain facilities that are on the final Electricity Supply Chain Map to be published on September 1.
6. Consider notifying facilities of their status on the Electricity Supply Chain map by email rather than physical mail, which many operators have said they have trouble receiving.

People died and suffered because of the failure of the gas supply system and Texas officials including the Railroad Commissioners who neglected to address these long-running issues.

Sincerely,
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