

From: Richaard Howe <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 9:13 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 a native Texan and lifelong conservative voter. 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.

Richaard Howe
rlhowejr@gmail.com

Plano, Texas 75023

[REDACTED]

From: Wayne Langley [REDACTED]
Sent: Friday, October 22, 2021 3:57 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Wayne Langley
wlangley88@msn.com
1001 Capetown Dr
Grand Prairie, Texas 75050

[REDACTED]

From: Michael Martin [REDACTED]
Sent: Friday, October 22, 2021 10:28 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Michael Martin
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6666 Lakewood Blvd.
Dallas, Texas 75214

[REDACTED]

From: Bette Burkett [REDACTED]
Sent: Friday, October 22, 2021 11:27 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Bette Burkett
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Bellaire, Texas 77401

From: bob fusinato <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 11:43 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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bob fusinato
bobfusinato@gmail.com

richardson, Texas 75080

[REDACTED]

From: Mary Beth Gilbert [REDACTED]
Sent: Friday, October 22, 2021 11:54 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Mary Beth Gilbert
marybethgilbert@comcast.net
2917 Plumb St.
Houston, Texas 77005

From: Paul Gonin <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 12:09 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Paul Gonin
pggonin@gmail.com
110 Powder Creek Cv
Georgetown, Texas 78633

[REDACTED]

From: [REDACTED] <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 12:41 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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thewineprince@protonmail.com
2810 N Creekwood Dr
Grapevine, Texas 76051

From: David Schulte <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 2:58 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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David Schulte
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San Antonio, Texas 78256

From: Daniel Meza <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 3:26 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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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.

Daniel Meza
danieljmeza17@gmail.com
4427 Quailgate Dr
Spring, Texas 77373

From: Kristen Hotopp <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 5:28 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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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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Kristen Hotopp
kristen.hotopp@gmail.com
1213 Garden St.
Austin, Texas 78702

From: Patrice Carranza <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 6:54 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Patrice Carranza
patcarranza@hotmail.com
3837 O Henry Drive
Garland, Texas 75042

From: Susan Gillette <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 9:30 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Susan Gillette
msgillette@hotmail.com
4412 14th St
Lubbock, Texas 79416

From: Rita Gates <info@email.actionnetwork.org>
Sent: Friday, October 22, 2021 5:46 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Rita Gates
ritalucchesi.gates@gmail.com
4312 Avenue A
Austin, Texas 78751

[REDACTED]

From: James Ryon [REDACTED]
Sent: Friday, October 22, 2021 2:34 PM
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,
James Ryon
1606 Pine Hills Ln
Corinth, TX 76210

[REDACTED]

From: Jill Robison [REDACTED]
Sent: Friday, October 22, 2021 8:39 PM
To: Rules Coordinator
Subject: Comment on Proposed Critical Infrastructure Rule

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Sincerely,
Jill Robison
11727 Riverview Dr
Houston, TX 77077

[REDACTED]

From: Ari Meyer [REDACTED]
Sent: Friday, October 22, 2021 12:48 AM
To: Rules Coordinator
Subject: Comment on Proposed Critical Infrastructure Rule

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

Sincerely,
Ari Meyer
4404 Travis Country Cir Apt H3
Austin, TX 78735

From: stevefrantz@everyactioncustom.com on behalf of Steve Frantz
<stevefrantz@everyactioncustom.com>
Sent: Friday, October 22, 2021 4:26 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,
Steve Frantz
8611 Ocean Dr Beach City, TX 77523-9297 stevefrantz@teleshare.net

From: svtranquilo@everyactioncustom.com on behalf of Neil McQueen
<svtranquilo@everyactioncustom.com>
Sent: Friday, October 22, 2021 8:12 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,

Texans like my family who had to deal with 4 days of power outages don't want a repeat of February 2021!

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Sincerely,
Neil McQueen
4213 Estate Dr Corpus Christi, TX 78412-2428 svtranquilo@hotmail.com

From: rrcwebcontact
Sent: Friday, October 22, 2021 11:45 AM
To: Rules Coordinator
Subject: The Form 'Critical Infrastructure Comment Form' was submitted



General Comment

Here is a new comment from the Web.

Comment

Choose Form

Form CI-D and Attachment

Name

Lanny Curry

Address

2640 Avon Drive

City

Garland

State

TX

Zip

75041

Business Phone, Fax

Email Confidentiality Preference

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

Email Address

[REDACTED]

Comments to proposed Form Amendments

Well Site infrastructure that supplies Electrical Power Generation Plants should indeed be hardened with penalties to the Gas Producers and/or Distributors that do not winterize. Additionally, Gas Producers and/or Distributors that supply Natural Gas to homes and businesses for Heating purposes should also be required to winterize with penalties for those who do not. To avoid additional loss of life, requirements to winterize with penalties should be enacted immediately.

From: rrcwebcontact
Sent: Friday, October 22, 2021 9:00 AM
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

Andrew Salmon

Address

6711 Telluride Trail

City

Austin

State

TX

Zip

78749

Business Phone, Fax

Email Confidentiality Preference

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

Email Address

[REDACTED]

Comments concerning proposed rulemakings

We strongly oppose 16 TAC Chapter 3 §3.65 (d) Critical Infrastructure Exception. Are you crazy? Why wouldn't every plant pay \$150 for an exception? This is a woefully lame provision that exemplifies who's side the Commission is on. We demand this provision be removed! Thank you for your consideration.

From: rrcwebcontact
Sent: Friday, October 22, 2021 9:43 AM
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

Beverly Clark

Address

719 Deer Crossing Lane

City

Wimberley

State

TX

Zip

78676

Business Phone, Fax

5128472784

Email Confidentiality Preference

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

Email Address

[REDACTED]

Comments concerning proposed rulemakings

Hopefully, I am addressing the proposed rule exempting natural gas well heads and pipelines from being designated "critical infrastructure" and thereby avoiding winterizing requirements for a \$150 application fee. It's a little hard to tell from the lack of information on TRRC website. It's like you don't want the public to know or comment. Too bad. I am extremely opposed to this exemption rule. The job you were elected to do requires you to protect Texans by ensuring our electric grid will not fail us in an emergency. With this proposed rule, you prove you are incompetent at your job. Fix the damn grid or get out of the way so Texans can find someone who will.

From: rrcwebcontact
Sent: Friday, October 22, 2021 11:50 AM
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

Ian Ward

Address

5909 Lookout Mountain Drive

City

Austin

State

TX

Zip

78731

Business Phone, Fax

5125732577

Email Confidentiality Preference

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

Email Address

[REDACTED]

Comments concerning proposed rulemakings

The proposed fine for energy winterization failures is absolutely scandalous. I can't imagine the explanation for this low figure being any kind of incentive for private energy providers in Texas to winterize. It has never been more clear to me that the commissioners and congress are in the industry's pocket.

From: rrcwebcontact
Sent: Friday, October 22, 2021 8:38 AM
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

Richard Schumacher

Address

POBox 835526

City

Richardson

State

TX

Zip

75083

Business Phone, Fax

Email Confidentiality Preference

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

Email Address

[REDACTED]

Comments concerning proposed rulemakings

Eliminate the opt-out provision allowing gas producers and pipelines to declare themselves non-essential. Require all gas producers and pipelines to weatherize to withstand conditions equivalent to those of February 2021, with fines for non-compliance.