Jeanne Devine Tuesday, October 19, 2021 8:09 PM Rules Coordinator 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 therefor 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. People must be able to count on uninterrupted power in dire circumstances. Last winter's damage and deaths should be uppermost in your minds as you consider how to keep Texans safe.

Jeanne Devine jdevine18@att.net 10809 Desert Willow Loop Austin, Texas 78748-4027

Lisa Stone Tuesday, October 19, 2021 8:04 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

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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, Lisa Stone 8902 Birdwood Court Houston, TX 77096

Dawne Meneguzzo Tuesday, October 19, 2021 8:04 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Dawne Meneguzzo Austin, TX 78758

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Sincerely, Dawne Meneguzzo Austin, TX 78758

Cheryl Carney Tuesday, October 19, 2021 8:06 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Cheryl Carney 1124 W Gramercy Place San Antonio, TX 78201

Pam Harper-Smith Tuesday, October 19, 2021 8:06 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Pam Harper-Smith 1112 Neal Pickett Dr College Station, TX 77840

Robert Wolpa Tuesday, October 19, 2021 8:07 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Robert Wolpa 3428 Old Colony Rd Dallas, TX 75233

Will Branch Tuesday, October 19, 2021 8:07 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Will Branch 2309 Trafalgar Dr Austin, TX 78723

Eric Scheihagen Tuesday, October 19, 2021 8:09 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Eric Scheihagen 3341 Saint Cloud Cir Dallas, TX 75229

Eleanor Sinclair Tuesday, October 19, 2021 8:10 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Eleanor Sinclair 3620 Huffines Blvd Carrollton, TX 75010

Jan Beauchamp Tuesday, October 19, 2021 8:10 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jan Beauchamp 1300 N 45th Apt 2023 Corsicana, TX 75110

D Hawke Tuesday, October 19, 2021 8:13 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, D Hawke houston, TX 77096

Sandi Hebley Tuesday, October 19, 2021 8:13 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Sandi Hebley 12304 Shiremont Dr Dallas, TX 75230

Chris Brunner Tuesday, October 19, 2021 8:13 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Chris Brunner 403 Spring Leaf Ct Allen, TX 75002

B Thompson Tuesday, October 19, 2021 8:14 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, B Thompson 2301 River Hills Rd Austin, TX 78733

Jean Mark Tuesday, October 19, 2021 8:16 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jean Mark 1146 Bobby St Pearland, TX 77581

Robert Mick Tuesday, October 19, 2021 8:16 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Robert Mick 12045 Lincolnshire Dr Austin, TX 78758

Beverly Hoff Tuesday, October 19, 2021 8:17 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Beverly Hoff 18521 Bandelier Dr Pflugerville, TX 78660

Jim and Sally Galindo Tuesday, October 19, 2021 8:17 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jim and Sally Galindo 16518 Willow Run St San Antonio, TX 78247

Denis Tidrick Tuesday, October 19, 2021 8:18 PM Rules Coordinator 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.

This brazen surrender of oversight and protection is ludicrous. Winter is 60 days away, time enough to get some of the work done. Get started right now!

Please strengthen this rule to avoid a repeat of last winter's tragedy, in which hundreds of Texans died and millions were left without power, sometimes for long periods. If you can't or won't do your job then step aside and I'll replace you. No excuse for this, so don't even advance one. I'd say thank you but I'm not currently inclined to be thankful for you.

Sincerely, Denis Tidrick 92 Booker Palm San Antonio, TX 78239

John Gallagher Tuesday, October 19, 2021 8:18 PM Rules Coordinator 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, John Gallagher 3224 Celeste Rd Apt 75 Cleburne, TX 76692

Izabella Dabrowski Tuesday, October 19, 2021 8:21 PM Rules Coordinator 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, Izabella Dabrowski 11805 Eubank Dr Austin, TX 78758

Alyssa Melton Tuesday, October 19, 2021 8:22 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Alyssa Melton 903 Briarcliff Ct Arlington, TX 76012

Karen Conyngham Tuesday, October 19, 2021 8:24 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Karen Conyngham 7403 Newhall Ln Austin, TX 78746

Sue Holtz Tuesday, October 19, 2021 8:25 PM Rules Coordinator 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, Sue Holtz 3622 Ridgestone Dr Garland, TX 75040

Robert Bauer Tuesday, October 19, 2021 8:28 PM Rules Coordinator 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.

It is beyond unthinkable that we have to petition for this after what happened last winter. I was one of the lucky ones whose utility prepared for the problems that they encountered. Isn't it sensible that Texas, a family friendly state, would make sure its families don't have to have a repeat of last winter and with such little effort.

Please do what you know is necessary. Thank you

Sincerely, Robert Bauer 645 Choctaw Est Cir Sherman, TX 75092

Betty Ferrero Tuesday, October 19, 2021 8:28 PM Rules Coordinator 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. Assessing a \$150.00 (!) fine is the height of arrogance! SO it's not worth more than that to make homes and businesses safe when we have unusual weather due to climate change?

Sincerely, Betty Ferrero 308 Pecan Lane Round Rock, TX 78664

Deb Hahn Tuesday, October 19, 2021 8:31 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Deb Hahn 13330 Noel Rd Dallas, TX 75240

Tony GRUBAUGH Tuesday, October 19, 2021 8:31 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Tony GRUBAUGH 167 Colonial St Fort Worth, TX 76111

Kenneth Sickler Tuesday, October 19, 2021 8:34 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Kenneth Sickler 9101 Brook Hill Ln Fort Worth, TX 76244

Leo Barrera Tuesday, October 19, 2021 8:36 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Leo Barrera 4406 killarmetkillarmett Corpus Christi, TX 78413

William Stone Tuesday, October 19, 2021 8:36 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, William Stone 6308 Shoal Creek Blvd Austin, TX 78757

Jn Randolph Tuesday, October 19, 2021 8:37 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jn Randolph 5210 Wentworth Dr Corpus Christi, TX 78413

Robert Bohmfalk Tuesday, October 19, 2021 8:41 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Robert Bohmfalk 1066 E College St Seguin, TX 78155

Michael Henson Tuesday, October 19, 2021 8:42 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Michael Henson Sherman, TX 75092

Georgena Askew askew Tuesday, October 19, 2021 8:42 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Georgena Askew askew 11821 Pueblo Carmel Way El Paso, TX 79936

Ira Dember Tuesday, October 19, 2021 8:42 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Ira Dember 10314 Hammerly Blvd Houston, TX 77043

Greg Pelham Tuesday, October 19, 2021 8:43 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Greg Pelham 943 Redway Ln Houston, TX 77062

Barbara Burton Tuesday, October 19, 2021 8:45 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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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, Barbara Burton 235 Guadalupe St Kerrville, TX 78028

Philip Hudson Tuesday, October 19, 2021 8:45 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Philip Hudson 612 Opal Ln Richardson, TX 75080

Ken Smith Tuesday, October 19, 2021 8:47 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Ken Smith 2618 Nottingham Pl Grand Prairie, TX 75050

Joseph Newland Tuesday, October 19, 2021 8:54 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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You must act for the people (for once).

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Sincerely, Joseph Newland 640 Lester St Houston, TX 77007

Molly Rooke Tuesday, October 19, 2021 8:56 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Molly Rooke 5825 Palm Ln Dallas, TX 75206

Carol Fly Tuesday, October 19, 2021 8:58 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Carol Fly 2205 Broughton Ct Austin, TX 78727

Elizabeth Edwards Tuesday, October 19, 2021 8:59 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Elizabeth Edwards 1519 Lochaline Loop Pflugerville, TX 78660

Kelly Hart Tuesday, October 19, 2021 9:00 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Kelly Hart 1025 Oxford St Houston, TX 77008

Barry Wolfer Tuesday, October 19, 2021 9:07 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Barry Wolfer Houston, TX 77059

Juan Flores Tuesday, October 19, 2021 9:08 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Juan Flores 925 Country Meadow San Antonio, TX 78253

Prudencio Aguilar Tuesday, October 19, 2021 9:15 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Prudencio Aguilar 128 Woodland Drive Burleson, TX 76028

Kylara Hunter Tuesday, October 19, 2021 9:23 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Kylara Hunter 425 Pine St Donna, TX 78537

Michael Richtberg Tuesday, October 19, 2021 9:25 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

I have over \$100,000 in damages and still don't have a kitchen!

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Sincerely, Michael Richtberg 2137 Hilton Head Round Rock, TX 78664

William Brogden Tuesday, October 19, 2021 9:27 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Imagine getting sued for failure to carry out these precautions!

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.

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Sincerely, William Brogden 130 Woodland Trl Leander, TX 78641

Warren Startup Tuesday, October 19, 2021 9:28 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Warren Startup 3919 Lord Byron Cir Round Rock, TX 78664

Edward Sharp Tuesday, October 19, 2021 9:40 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Edward Sharp 3100 Blessing Ct Apt 322 Bedford, TX 76021

Freda Ballas Tuesday, October 19, 2021 9:45 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Freda Ballas 7531 Caruth Blvd Dallas, TX 75225

Sean Sheeley Tuesday, October 19, 2021 9:48 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Sean Sheeley 3302 Jacobs Dr McKinney, TX 75070

Carol Ortiz Tuesday, October 19, 2021 9:50 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Carol Ortiz 256 Mesa Vw Montgomery, TX 77316

Shawn Troxell Tuesday, October 19, 2021 10:00 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

What? Y'all are offering an "opt-out" instead of protecting our grid? Ouch. You should do better. And if you don't, we'll vote you out.

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.

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Sincerely, Shawn Troxell 487 Dallas St New Braunfels, TX 78130

Ryan W. Tuesday, October 19, 2021 10:01 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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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.

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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, Ryan W. 5002 River Kenton San Antonio, TX 78240

Frank skelly Tuesday, October 19, 2021 10:07 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Frank skelly 8017 Lake Tahoe Trl Fort Worth, TX 76137

Jon Mullin Tuesday, October 19, 2021 10:22 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jon Mullin 2625 W Walnut Hill Ln Irving, TX 75038

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Robert Entrekin Tuesday, October 19, 2021 10:32 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Robert Entrekin 1723 E. Houston St. Sherman, TX 75090

Sandra Varvel Tuesday, October 19, 2021 10:35 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Sandra Varvel 11513 Cree Ct El Paso, TX 79936

Laura Wilder Tuesday, October 19, 2021 10:43 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Laura Wilder 4905 Rollingwood Ct Garland, TX 75043

Joanne Groshardt Tuesday, October 19, 2021 10:45 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Joanne Groshardt 302 Trailridge Dr Richardson, TX 75081

Bruce Ross Tuesday, October 19, 2021 10:55 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Bruce Ross 3707 Landon Park Dr Katy, TX 77449

Donna Davis Tuesday, October 19, 2021 10:57 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

I almost froze last winter, I fell and broke my arm and could not get to a hospital for a week, and every plant in my green house (THOUSANDS of DOLLAS worth died and were not covered by insurance) and I do not ever want a rerun of that nightmare that YOU can easily fix but are too greedy to consider!!

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Sincerely, Donna Davis 11419 Old Lockhart Hwy Creedmoor, TX 78610

Nancy E Hooten Tuesday, October 19, 2021 10:57 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Nancy E Hooten 800 Plummer Dr Cedar Hill, TX 75104

Davisha Shanks Tuesday, October 19, 2021 10:58 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Davisha Shanks 224 Shoshone Ridge Dr La Marque, TX 77568

Keith Thornton Tuesday, October 19, 2021 11:07 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Keith Thornton 4737 Mount Hood Rd Fort Worth, TX 76137

Kathy Brookes Tuesday, October 19, 2021 11:10 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Kathy Brookes Lubbock, TX 79423

Amy Weappa Tuesday, October 19, 2021 11:19 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Amy Weappa 813 W Mary St Austin, TX 78704

Edward Vaver Tuesday, October 19, 2021 11:24 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Edward Vaver 6400 Independence Pkwy Apt 3010 Plano, TX 75023

Christopher Tuch Tuesday, October 19, 2021 11:44 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Christopher Tuch 647 Ridgehorn Dr New Braunfels, TX 78130

mimi scott Tuesday, October 19, 2021 8:12 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, mimi scott 2915 Naples Park Lane, Richmond, TX, USA Richmond, TX 77406

Robert Book Tuesday, October 19, 2021 8:15 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Robert Book 7191 Kendallwood Dr Dallas, TX 75240

Fred Ferate Tuesday, October 19, 2021 8:18 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Fred Ferate 11309 Kingsgate Dr Austin, TX 78748

Lynda Polich Tuesday, October 19, 2021 8:29 PM Rules Coordinator 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, Lynda Polich 3931 Kelsey Ct Grapevine, TX 76051

Shari Norris Tuesday, October 19, 2021 8:32 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Shari Norris 14419 Briarlake St. San Antonio, TX 78247

Marc Lionetti Tuesday, October 19, 2021 8:32 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Marc Lionetti 2200 Dickson Dr Austin, TX 78704

Madalynn Carey Tuesday, October 19, 2021 8:35 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Madalynn Carey 11500 Huebner Rd Apt 2207 San Antonio, TX 78230

Georgene Evans Tuesday, October 19, 2021 8:41 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Georgene Evans 338 Artemis Dr San Antonio, TX 78218

Kathryn Burns Tuesday, October 19, 2021 8:43 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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I personally was lucky, because somehow, I accidentally had leased an apartment that was relatively near a hospital, and to my surprise, the state actually protects infrastructure around them. Average citizens wouldn't know that, and shouldn't have to in order to keep warm in the winter.

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

Sincerely, Kathryn Burns 12610 Riata Trace Pkwy, Apt 1018 Austin, TX 78727

Jan Adrian Tuesday, October 19, 2021 8:43 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jan Adrian 2801 Denton Tap Rd Lewisville, TX 75067

Nancy Cook Tuesday, October 19, 2021 8:44 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Nancy Cook 5997 County Road 3214 Lone Oak, TX 75453

Mark Blandford Tuesday, October 19, 2021 8:46 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Mark Blandford 2800 Randy St # 2 Amarillo, TX 79124

Sylvia Duncan Tuesday, October 19, 2021 8:50 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Sylvia Duncan 1117 Orlando Dr Plano, TX 75075

Virginia Jevric Tuesday, October 19, 2021 8:57 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Virginia Jevric 120 Gaucho Boerne, TX 78006

Gary Hild Tuesday, October 19, 2021 9:00 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Gary Hild 4845 Long Shadows Rd Navasota, TX 77868

mr dan Tuesday, October 19, 2021 9:13 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, mr dan El Paso, TX 79955

James Friery Tuesday, October 19, 2021 9:19 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, James Friery 9400 BAUMAN RD Houston, TX 77076

Cheryl Robison Tuesday, October 19, 2021 9:20 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Cheryl Robison 3820 Pershing Ave Fort Worth, TX 76107

SANDY PHILLIPS Tuesday, October 19, 2021 9:20 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

Voting Texans are counting on you to help ensure that we don't have a repeat of last February's deadly winter storm blackouts. As elections draw near, we will be very clear on who is accountable for anything like the power outages that left us all traumatized.

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.

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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. Adding to the trauma from last February will ensure a lengthy memory and high voter turnout at election time. Your role is voted on, and the farmer's almanac is calling for another winter event this season.

Sincerely, SANDY PHILLIPS 6741 Catania Loop Round Rock, TX 78665

Jill Robison Tuesday, October 19, 2021 9:22 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jill Robison 11727 Riverview Dr Houston, TX 77077

Sarah Meador Tuesday, October 19, 2021 9:22 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

Texans died last winter. We've been waiting with exceptional patience to see if our lawmakers will do anything to correct the energy system failures that compounded the suffering and struggle for so many families.

The FERC report lets us know that gas fuel supply problems were the second largest cause of the deadly power outages. That same report gave steps to stop it from happening again. Now it's up to you to make sure those steps are taken.

This current rule proposal allows any operator to simply opt out of weatherizing. This is absurd. The Railroad Commission must ensure that operators supplying gas to electric generation facilities are weatherized.

Don't allow the very suppliers whose carelessness already cost lives to opt out of weatherization.

Sincerely, Sarah Meador 3525 Chuckwagon Rd Luling, TX 78648

Laura Esparza Tuesday, October 19, 2021 9:26 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Laura Esparza 1318 Viewridge Dr San Antonio, TX 78213

Robert Stark Tuesday, October 19, 2021 9:35 PM Rules Coordinator 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, Robert Stark 15210 Penn Hills Ln Houston, TX 77062

Art Devitalis Tuesday, October 19, 2021 9:39 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

My family almost froze to death last winter.

If your natural gas barons can't wintering their facilities, bust them.

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.

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Sincerely, Art Devitalis 17265 N Interstate 35 West, TX 76691

renee naymick Tuesday, October 19, 2021 9:42 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, renee naymick Houston, TX 77040

renee naymick Tuesday, October 19, 2021 9:42 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, renee naymick Houston, TX 77040

Mary Lee Johns Tuesday, October 19, 2021 9:43 PM Rules Coordinator 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, Mary Lee Johns 18027 Longcliffe Dr Houston, TX 77084

Ed Fiedler Tuesday, October 19, 2021 9:49 PM Rules Coordinator 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, Ed Fiedler 11505 June Dr Austin, TX 78753

Dr Mn Taylor Tuesday, October 19, 2021 9:58 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

What are you doing to 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 ridiculous 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 immediately strengthen all the rules necessary to avoid a repeat of last winter's tragedy, in which hundreds died and millions were left without power.

Sincerely, Dr Mn Taylor 1618 Meadow Park Dr Keller, TX 76248

Ashlyn Remmert Tuesday, October 19, 2021 10:22 PM Rules Coordinator 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, Ashlyn Remmert 29712 Sullivan Oaks Dr Spring, TX 77386

Joyce Moore Tuesday, October 19, 2021 10:24 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Joyce Moore 4508 52nd St Lubbock, TX 79414

Carol Grimm Tuesday, October 19, 2021 10:30 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Carol Grimm 612 Dale Dr San Marcos, TX 78666

Shirlene Harris Tuesday, October 19, 2021 10:38 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Shirlene Harris 13333 Syracuse St San Antonio, TX 78249

Tobin Strickland Tuesday, October 19, 2021 10:52 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Tobin Strickland 11803 Knollpark Dr. Austin, TX 78758

Cindy Kelton Tuesday, October 19, 2021 11:00 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Cindy Kelton 1072 Twin Estates Dr Kyle, TX 78640

Jeff Smith Tuesday, October 19, 2021 11:25 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Jeff Smith 1701 N Edwards Ave Apt 12 Mount Pleasant, TX 75455

Margarita Giustino Tuesday, October 19, 2021 11:27 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Margarita Giustino 6919 Washita Way San Antonio, TX 78256

Carolyn Stone Tuesday, October 19, 2021 11:35 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, Carolyn Stone 318 Lakeside Dr. Channelview, TX 77530

D Schoech Tuesday, October 19, 2021 8:04 PM Rules Coordinator Comment on Proposed Critical Infrastructure Rule

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Sincerely, D Schoech 2614 Chinquapin Oak Ln Arlington, TX 76012

| From: | zakderouen@everyactioncustom.com on behalf of Zak Derouen <zakderouen@everyactioncustom.com></zakderouen@everyactioncustom.com> |
|----------|--|
| Sent: | Tuesday, October 19, 2021 8:08 PM |
| То: | 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, Zak Derouen 1601 Holleman Dr Apt 202 College Station, TX 77840-3230 zakderouen@gmail.com

| From: | kaylynnlyon@everyactioncustom.com on behalf of KayLynn Lyon <kaylynnlyon@everyactioncustom.com></kaylynnlyon@everyactioncustom.com> |
|----------|--|
| Sent: | Tuesday, October 19, 2021 10:43 PM |
| То: | 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, KayLynn Lyon 110 Coyote Trl Georgetown, TX 78633-5341 kaylynnlyon@yahoo.com

| From: | valerieplese@everyactioncustom.com on behalf of Valerie Plese |
|----------|---|
| | <valerieplese@everyactioncustom.com></valerieplese@everyactioncustom.com> |
| Sent: | Tuesday, October 19, 2021 7:05 PM |
| То: | 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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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.

I understand that the decision not to winterize and spend the money, was arrived at after 6 minutes of discussion. This is immoral.

Sincerely, Valerie Plese 3883 Turtle Creek Blvd Apt 408 Dallas, TX 75219-4455 valerieplese@yahoo.com

Mike Lu Tuesday, October 19, 2021 8:19 PM Rules Coordinator 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 therefor 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.

Mike Lu nihaomike@aggienetwork.com 337 Desert Willow Way Austin, Texas 78737

Linda Ford Tuesday, October 19, 2021 9:14 PM Rules Coordinator 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Linda Ford lindavangogh@att.net 540 Park Ln Richardson, Texas 75081