Cheryl Carney Wednesday, October 27, 2021 6:28 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, Cheryl Carney San Antonio, TX 78201

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Sylvia Duncan Wednesday, October 27, 2021 8:37 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, Sylvia Duncan 1117 Orlando Dr Plano, TX 75075

From:	antoinetterys@everyactioncustom.com on behalf of Antoinette Reyes <antoinetterys@everyactioncustom.com></antoinetterys@everyactioncustom.com>
Sent:	Wednesday, October 27, 2021 9:09 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, Antoinette Reyes PO Box 3284 Mesilla Park, NM 88047-3284 antoinetterys@gmail.com From:Robert Stevens < Robert.Stevens.484515445@p2a.co>Sent:Wednesday, October 27, 2021 10:56 PMTo:Rules CoordinatorSubject: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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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, Robert Stevens 1806 Stonegate Dr Denton, TX 76205 From:Rita Rosas <Rita.Rosas.179771909@p2a.co>Sent:Wednesday, October 27, 2021 10:54 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Rita Rosas 111 Lariat Ln Dripping Springs, TX 78620 From:Ron Unger <Ron.Unger.98590207@p2a.co>Sent:Wednesday, October 27, 2021 10:47 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Ron Unger 5902 Morningside Ave Dallas, TX 75206 From:Robert Breckbill < Robert.Breckbill.121489799@p2a.co>Sent:Wednesday, October 27, 2021 10:47 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Robert Breckbill 22325 Rock Wren Spicewood, TX 78669 From:Dorothy Kraemer < Dorothy.Kraemer.88574738@p2a.co>Sent:Wednesday, October 27, 2021 10:46 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Dorothy Kraemer 700 W Noton St Pflugerville, TX 78660 From:Roger Keele <Roger.Keele.484514590@p2a.co>Sent:Wednesday, October 27, 2021 10:35 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Roger Keele 3514 Tierwood Ct Houston, TX 77068 From:Edrina Kallashi < Edrina.Kallashi.484514158@p2a.co>Sent:Wednesday, October 27, 2021 10:25 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Edrina Kallashi 4006 Forest Ridge Landing Houston, TX 77084 From:Margarita Bach < Margarita.Bach.59690399@p2a.co>Sent:Wednesday, October 27, 2021 10:17 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Margarita Bach 304 Park Crest Ave Euless, TX 76039 From:Ms. Melton <Ms.Melton.214313817@p2a.co>Sent:Wednesday, October 27, 2021 10:00 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Ms. Melton 3209 Brookmeade Ct Deer Park, TX 77536 From:Dorothea Vander Stoep < Dorothea.VanderStoep.484512105@p2a.co>Sent:Wednesday, October 27, 2021 9:38 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Dorothea Vander Stoep 14900 Perthshire Rd Houston, TX 77079 From:Jennifer Macia < Jennifer.Macia.88475008@p2a.co>Sent:Wednesday, October 27, 2021 9:19 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Jennifer Macia 4305 Jonathan St Bellaire, TX 77401 From:Mike Latta < Mike.Latta.484510332@p2a.co>Sent:Wednesday, October 27, 2021 9:06 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Mike Latta 12 Los Ranchos Dr Alpine, TX 79830 From:Linda Newton <Linda.Newton.477986027@p2a.co>Sent:Wednesday, October 27, 2021 8:58 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Linda Newton 1407 Briar Point Ln Brenham, TX 77833 From:Martha Latta < Martha.Latta.105648583@p2a.co>Sent:Wednesday, October 27, 2021 8:55 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Martha Latta 12 Los Ranchos Dr Alpine, TX 79830 From:Diane Evans <Diane.Evans.121483542@p2a.co>Sent:Wednesday, October 27, 2021 8:46 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Diane Evans 5811 Bryan Pkwy Dallas, TX 75206

From:	Binhui Liu <binhui.liu.484507886@p2a.co></binhui.liu.484507886@p2a.co>
Sent:	Wednesday, October 27, 2021 8:29 PM
То:	Rules Coordinator
Subject:	Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Binhui Liu 9023 Linkmeadow Ln Houston, TX 77025 From:Tierra Ortiz-Rodriguez <Tierra.OrtizRodriguez.180325209@p2a.co>Sent:Wednesday, October 27, 2021 8:08 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Tierra Ortiz-Rodriguez 11727 Pedernales Falls Ln Sugar Land, TX 77498 From:Susan Witten <Susan.Witten.88493116@p2a.co>Sent:Wednesday, October 27, 2021 8:06 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Please protect the citizens of Texas and close the loophole and require all gas facilities to weatherize.

Regards, Susan Witten 723 Pleasant Valley Ln Richardson, TX 75080 From:Rose Brewer <Rose.Brewer.121461465@p2a.co>Sent:Wednesday, October 27, 2021 8:02 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Rose Brewer 2407 Lazybrook Dr Houston, TX 77008 From:Jay Watkins < Jay.Watkins.484505248@p2a.co>Sent:Wednesday, October 27, 2021 7:51 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Jay Watkins 11910 Heritage Houston, TX 77024 From:Jeremy Estey < Jeremy.Estey.484504861@p2a.co>Sent:Wednesday, October 27, 2021 7:47 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Jeremy Estey 2503 Elmen St Houston, TX 77019 From:Stephen Holler < Stephen.Holler.41081592@p2a.co>Sent:Wednesday, October 27, 2021 7:44 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Stephen Holler 14915 Windlea Ln Houston, TX 77040 From:Douglas Stauffer <Douglas.Stauffer.477979223@p2a.co>Sent:Wednesday, October 27, 2021 7:42 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Douglas Stauffer 1305 Lexington St Taylor, TX 76574 From:Gaby Moidel <Gaby.Moidel.82469489@p2a.co>Sent:Wednesday, October 27, 2021 7:42 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Gaby Moidel 614 Blue Iris Trail Houston, TX 77079 From:Alexis Romo < Alexis.Romo.331061286@p2a.co>Sent:Wednesday, October 27, 2021 7:34 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Alexis Romo 3701 Easton Meadows Dr Garland, TX 75043

JIM JENNEN <JIM.JENNEN.484502656@p2a.co> Wednesday, October 27, 2021 7:23 PM Rules Coordinator Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

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Regards, JIM JENNEN 442 Melrose Dr Richardson, TX 75080 From:Carmen Flores <Carmen.Flores.82384654@p2a.co>Sent:Wednesday, October 27, 2021 7:13 PMTo:Rules CoordinatorSubject: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.

Regards, Carmen Flores 2422 Albans Rd Houston, TX 77005

From:	Sandra Hanneman <sandra.hanneman.484501710@p2a.co></sandra.hanneman.484501710@p2a.co>
Sent:	Wednesday, October 27, 2021 7:10 PM
То:	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. Please ensure that gas wells, pipelines, and generating plants are winterized so we don't face another widespread blackout like we did in February 2021. All gas wells, pipelines, and parts of the gas supply chain need to be prepared to operate in extreme weather conditions - hot and cold.

I want to see all operators that supply gas to electric generation facilities classified as critical infrastructure.

My family, neighbors, and I are counting on the Railroad Commission to provide strong rules and oversight to make sure that what happened with power outages in February 2021 doesn't happen again.

All gas facilities need to be weatherized.

Thank you. Sandra K. Hanneman 2011 Quenby Street Houston, TX 77005

Regards, Sandra Hanneman 2011 Quenby St Houston, TX 77005 From:Laura Utrecht <Laura.Utrecht.250570876@p2a.co>Sent:Wednesday, October 27, 2021 7:05 PMTo:Rules CoordinatorSubject: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.

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Regards, Laura Utrecht 6229 Palo Pinto Ave Dallas, TX 75214 From:Laura Vera <Laura.Vera.38176267@p2a.co>Sent:Wednesday, October 27, 2021 7:04 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Laura Vera 2731 Mary Ln Dickinson, TX 77539 From:Patricia Townsend <Patricia.Townsend.248758826@p2a.co>Sent:Wednesday, October 27, 2021 7:04 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Patricia Townsend 6327 Saratoga Cir Dallas, TX 75214 From:Pam Harper-Smith <Pam.HarperSmith.8428675@p2a.co>Sent:Wednesday, October 27, 2021 7:03 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Pam Harper-Smith 1112 Neal Pickett Dr College Station, TX 77840
From:Sara Fernandez <Sara.Fernandez.101480727@p2a.co>Sent:Wednesday, October 27, 2021 6:56 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Sara Fernandez 1515 Hyde Park Blvd Houston, TX 77006 From:Maryrose Cimino < Maryrose.Cimino.231199087@p2a.co>Sent:Wednesday, October 27, 2021 6:48 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Maryrose Cimino 4304 Cobblers Ln Dallas, TX 75287 From:Sonora Hudson < Sonora.Hudson.95133973@p2a.co>Sent:Wednesday, October 27, 2021 6:47 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Sonora Hudson 1743 Esperanza St Houston, TX 77023 From:Brian Salek <Brian.Salek.307412599@p2a.co>Sent:Wednesday, October 27, 2021 6:46 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Brian Salek 414 Electra Dr Houston, TX 77024 From:Kristin Lewis <Kristin.Lewis.214171248@p2a.co>Sent:Wednesday, October 27, 2021 6:41 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Kristin Lewis 4110 Bluebonnet Dr Stafford, TX 77477 From:Sturgis Sobin < Sturgis.Sobin.484498869@p2a.co>Sent:Wednesday, October 27, 2021 6:39 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Sturgis Sobin 732 Arlington St Houston, TX 77007 From:Gregory Lindquist <Gregory.Lindquist.95206521@p2a.co>Sent:Wednesday, October 27, 2021 6:31 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Gregory Lindquist 5843 Ettrick Dr Houston, TX 77035 From:Audra Croft <Audra.Croft.179680900@p2a.co>Sent:Wednesday, October 27, 2021 6:23 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Audra Croft 18103 Angel Valley Dr Leander, TX 78641 From:Rachael Olan <Rachael.Olan.484497202@p2a.co>Sent:Wednesday, October 27, 2021 6:18 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Rachael Olan 1403 Vz County Rd 4614 Ben Wheeler, TX 75754 From:Joseph Manlapaz < Joseph.Manlapaz.484497211@p2a.co>Sent:Wednesday, October 27, 2021 6:18 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Joseph Manlapaz 501 Heritage Way Stephenville, TX 76401 From:Patricia Kanter-Kennedy <Patricia.KanterKennedy.147291042@p2a.co>Sent:Wednesday, October 27, 2021 6:17 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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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 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, Patricia Kanter-Kennedy 8603 Mayridge Cir Houston, TX 77099 From:Tom Doyle <Tom.Doyle.484497095@p2a.co>Sent:Wednesday, October 27, 2021 6:16 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Tom Doyle 8132 Mt Shasta Cir Fort Worth, TX 76137 From:April Carne < April.Carne.212459160@p2a.co>Sent:Wednesday, October 27, 2021 6:05 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, April Carne 1708 River Birch Dr Flower Mound, TX 75028 From:Amardip Panesar < Amardip.Panesar.484495565@p2a.co>Sent:Wednesday, October 27, 2021 5:58 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Amardip Panesar 624 Natches Trce Coppell, TX 75019 From:Adriane O'Hara < Adriane.OHara.484495169@p2a.co>Sent:Wednesday, October 27, 2021 5:53 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Adriane O'Hara 15309 English River Loop Leander, TX 78641 From:Cynthia Roberts <Cynthia.Roberts.484494610@p2a.co>Sent:Wednesday, October 27, 2021 5:46 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Cynthia Roberts 1604 Rock Creek Dr Round Rock, TX 78681 From:Cathy Fulton <Cathy.Fulton.336002277@p2a.co>Sent:Wednesday, October 27, 2021 5:45 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

To Governor Abbott, Rather than create bills that have nothing to do with actually helping Texas citizens, the electric grid and its suppliers are truly critical for all of Texas. This is what you should be focused on, Mr. Abbott, not your lame ass attempts to appease radical conservatives. Shame on you sir! We have real problems and issues going on in this state that continue to not be addressed. State agencies like TCEQ and the Railroad Commission don't do their ultimate job which is to protect our environment, air and water. Mr. Abbott you want to do you job? You could start by addressing the many failures of both these agencies. Current Railroad Commissioners are also a joke, especially Mr. Wright and all should be removed.

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Regards, Cathy Fulton 1211 TX-361 Port Aransas, TX 78373 From:Daniel Moulton < Daniel.Moulton.181198741@p2a.co>Sent:Wednesday, October 27, 2021 5:45 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Daniel Moulton 3764 Chatham Ct Dr Addison, TX 75001 From:Carl Kaping <Carl.Kaping.484494359@p2a.co>Sent:Wednesday, October 27, 2021 5:43 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Carl Kaping 14314 Heath Falls Ln Cypress, TX 77429 From:Deborah Heywood <Deborah.Heywood.60977001@p2a.co>Sent:Wednesday, October 27, 2021 5:41 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Deborah Heywood 16614 John Silver Rd Jamaica Beach, TX 77554 From:Carol Pennington <Carol.Pennington.168147959@p2a.co>Sent:Wednesday, October 27, 2021 5:39 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Carol Pennington 1005 Bluebird Dr Manchaca, TX 78652 From:Linda Cox <Linda.Cox.203324286@p2a.co>Sent:Wednesday, October 27, 2021 5:35 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Linda Cox 1073 Greenwood Ln Lewisville, TX 75067 From:Annette lott <Annette.lott.304112720@p2a.co>Sent:Wednesday, October 27, 2021 5:34 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Annette lott 919 Waterview Cir Richardson, TX 75080 From:Janet Woody <Janet.Woody.477958776@p2a.co>Sent:Wednesday, October 27, 2021 5:33 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Janet Woody 2934 Waterfront Dr Garland, TX 75042 From:Jan Farley <Jan.Farley.484493549@p2a.co>Sent:Wednesday, October 27, 2021 5:33 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Jan Farley 5121 Palmetto St Bellaire, TX 77401 From:Fred Fulton <Fred.Fulton.484493468@p2a.co>Sent:Wednesday, October 27, 2021 5:32 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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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.

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, Fred Fulton 3718 Cragmont Ave Dallas, TX 75205 From:Matt Spaethe <Matt.Spaethe.463622728@p2a.co>Sent:Wednesday, October 27, 2021 5:29 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Matt Spaethe 613 Blue Mound Rd E Haslet, TX 76052 From:Thomas West <Thomas.West.56878655@p2a.co>Sent:Wednesday, October 27, 2021 5:28 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Thomas West 7027 E Grand Ave Dallas, TX 75223 From:Bruce Radebaugh <Bruce.Radebaugh.484493099@p2a.co>Sent:Wednesday, October 27, 2021 5:26 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Bruce Radebaugh 8222 Lakeshore Villa Dr Humble, TX 77346 From:William Sweet <William.Sweet.199905197@p2a.co>Sent:Wednesday, October 27, 2021 5:26 PMTo:Rules CoordinatorSubject: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 is an easily exploitable loophole that makes all but certain another catastrophic failure of our grid and energy supplies when, not if, similar weather occurs. ALL gas operators to must be required 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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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 am 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. The residents of Texas deserve no less.

Regards, William Sweet 9134 Gothic Dr Universal City, TX 78148 From:Cherry Matthews <Cherry.Matthews.86642130@p2a.co>Sent:Wednesday, October 27, 2021 5:25 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Cherry Matthews 1306 55th St Galveston, TX 77551 From:Frances Heard <Frances.Heard.484492874@p2a.co>Sent:Wednesday, October 27, 2021 5:25 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Frances Heard 5607 Carew St Houston, TX 77096 From:Carole Wilmoth <Carole.Wilmoth.15578185@p2a.co>Sent:Wednesday, October 27, 2021 5:19 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Carole Wilmoth 404 W Hillcrest St Keene, TX 76059 From:Albert Tindall < Albert.Tindall.484491956@p2a.co>Sent:Wednesday, October 27, 2021 5:13 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Albert Tindall 525 Edinburgh Ln Coppell, TX 75019 From:David Morris <David.Morris.307407360@p2a.co>Sent:Wednesday, October 27, 2021 5:12 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, David Morris 2514 Watts St Houston, TX 77030 From:Betty da Silva-Draud <Betty.daSilvaDraud.109194466@p2a.co>Sent:Wednesday, October 27, 2021 5:10 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Betty da Silva-Draud 11639 Briar Rose Dr Houston, TX 77077

From:	Linda Adamczyk <linda.adamczyk.121674568@p2a.co></linda.adamczyk.121674568@p2a.co>
Sent:	Wednesday, October 27, 2021 5:08 PM
То:	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.

Regards, Linda Adamczyk 6623 Duffield Dr Dallas, TX 75248 From:Juli Kring <Juli.Kring.229945405@p2a.co>Sent:Wednesday, October 27, 2021 5:07 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Dear Rules Coordinator,

I am contacting you today after learning that the Railroad Commission's current proposed rule language allows any gas operator to opt-out of "critical infrastructure" designation, creating an easily exploitable loophole that risks repeating another catastrophic failure of our grid and energy supplies.

Please require ALL gas operators to weatherize their equipment.

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Regards, Juli Kring 12400 Brookglade Cir Houston, TX 77099 From:Sharon Spalding <Sharon.Spalding.477904333@p2a.co>Sent:Wednesday, October 27, 2021 5:04 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Sharon Spalding 7230 Leameadow Dr Dallas, TX 75248 From:Ben LaLonde <Ben.LaLonde.484491208@p2a.co>Sent:Wednesday, October 27, 2021 5:04 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Ben LaLonde 7318 Teas Cottage Dr Conroe, TX 77304 From:Beth Soletsky < Beth.Soletsky.484490993@p2a.co>Sent:Wednesday, October 27, 2021 5:02 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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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 essential that all the gas wells, pipelines, and parts of the gas supply chain are prepared to operate in extreme weather conditions.

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, Beth Soletsky 4904 Milam St Houston, TX 77006 From:Sheila Walton <Sheila.Walton.469006988@p2a.co>Sent:Wednesday, October 27, 2021 5:00 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Sheila Walton 108 Bayshore Dr Ingleside, TX 78362 From:Paula Pedersen < Paula.Pedersen.180045741@p2a.co>Sent:Wednesday, October 27, 2021 11:18 PMTo:Rules CoordinatorSubject:Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards, Paula Pedersen 125 Mossridge Universal City, TX 78148 From: Sent: To: Subject: Marianne Lanphier <info@email.actionnetwork.org> Wednesday, October 27, 2021 7:59 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.

Marianne Lanphier marianne.lanphier@yahoo.com 903 South Weatherred Driv Richardson, Texas 75080