

From: Nena Cook [REDACTED] Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Wednesday, October 27, 2021 12:55 AM
To: Rules Coordinator
Subject: Eliminate the loophole for weatherization and make it your priority to protect Texans

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Dear Texas Railroad Commission comment submission,

Dear Commissioners,

I am writing to express my serious concerns regarding the Texas Railroad Commission's new rules covering the winterization of infrastructure along the gas supply line. Fossil fuel companies and government regulators, including the Texas Railroad Commission, have known about the need to winterize the power grid and gas supply line for many years. But companies and regulators alike have failed to act, putting corporate profits and campaign contributions over the interests of Texans who literally froze this past February.

Past decisions to put profits over people, and not winterize resulted in the death of hundreds of Texans and an estimated \$295 billion dollars in damages, not to mention billions of dollars in high gas and electric bills that will be paid back by consumers over the next decade. That is just the numbers from this year - winter storms in past years have resulted in many more deaths and much more damage.

Right now, you have the opportunity to make change. The rules currently under consideration are grossly insufficient in that they provide a way for corporations to opt out of weatherization. To be clear, any operator that supplies gas to generate power, must be classified as critical infrastructure, and therefore be required to weatherize their operations. Under the rule proposal, a facility is designated as a critical gas supplier unless the facility's operator asserts the facility is not prepared to operate during a weather emergency. This means that any gas supply infrastructure can file an exception with no requirement to say why simply by filing a \$150 dollar exception request.

The Commission must eliminate this exception. As long as gas continues to play a role in the Texas power grid, the operators who supply it must do so in a manner that serves Texans instead of their own financial interests.

Sincerely,

Nena Cook
222 bear paw drive
Newport, WA 99156
cooknena@hotmail.com
(509) 447-4666

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: Jessica Garrett Perry [REDACTED] Sent You a Personal Message
Sent: <kwautomail@phone2action.com>
To: Wednesday, October 27, 2021 5:28 AM
Subject: Rules Coordinator
Eliminate the loophole for weatherization and make it your priority to protect Texans

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Dear Texas Railroad Commission comment submission,

This should not be allowed to happen in this day and age. It is the responsibility of the utilities to ensure the effective delivery of services. They have the resources. They need to invest in their own businesses, not we the people who make zero profit and pay for their services. That's the cost of doing business. It needs to stay on the end of the industry. Protect the people, not the corporations...that is your only job. Do it.

Dear Commissioners,

I am writing to express my serious concerns regarding the Texas Railroad Commission's new rules covering the winterization of infrastructure along the gas supply line. Fossil fuel companies and government regulators, including the Texas Railroad Commission, have known about the need to winterize the power grid and gas supply line for many years. But companies and regulators alike have failed to act, putting corporate profits and campaign contributions over the interests of Texans who literally froze this past February.

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The Commission must eliminate this exception. As long as gas continues to play a role in the Texas power grid, the operators who supply it must do so in a manner that serves Texans instead of their own financial interests.

Sincerely,

Jessica Garrett Perry
8 Center Street
Fair Haven, VT 05743
jessica.lee.garrett@gmail.com
(315) 725-1385

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.

From: Mary Edmonson [REDACTED]
Sent: Wednesday, October 27, 2021 4:11 PM
To: Rules Coordinator
Subject: Let's Not Repeat a Tragedy...Require all gas facilities to weatherize (16 TAC §3.65 and § 3.107 publ

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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.

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. If we are the energy state, we need to ensure our citizens have the needed power. Let's not look foolish to the entire world yet again. Texas can and must do better.

Regards,
Mary Edmonson
16023 Pebble Bend Dr
Houston, TX 77068

From: Sarah Sisbach [REDACTED]
Sent: Wednesday, October 27, 2021 1:32 AM
To: Rules Coordinator
Subject: Opposition to Proposed Rule re: winterization

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Dear Commissioners:

I was proud of the legislature enacting legislation following last winter's debacle to require power companies (whose profits suggest they could and should have done this all along) to step up and put in place appropriate infrastructure to preclude a repeat. However, the proposed rule is basically caving to the greed of the industry at the expense of all Texans and allowing them to simply file for an exemption and avoid the expense of doing the right thing. Shame on you if this is passed. Please please protect the citizens of Texas by holding true to the original legislation and not passing a rule that lets power providers reap financial reward without making the financial investment to install weatherization infrastructure to meet the increasingly severe weather conditions caused by climate change.

Sarah Sisbach

From: Linda Demjen [REDACTED]
Sent: Wednesday, October 27, 2021 4:58 PM
To: 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 Demjen
517 Caplin St
Houston, TX 77022

From: Mira Wizig <Mira.Wizig.273308629@p2a.co>
Sent: Wednesday, October 27, 2021 4:55 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Mira Wizig
5107 Indigo St
Houston, TX 77096

From: Christine Wordlaw <Christine.Wordlaw.8229540@p2a.co>
Sent: Wednesday, October 27, 2021 4:52 PM
To: 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,
Christine Wordlaw
3004 Allister St
Dallas, TX 75229

From: Patricia White <Patricia.White.484490128@p2a.co>
Sent: Wednesday, October 27, 2021 4:49 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Patricia White
1318 Hi Cir N
Horseshoe Bay, TX 78657

From: Deborah Wilson <Deborah.Wilson.90117679@p2a.co>
Sent: Wednesday, October 27, 2021 4:48 PM
To: 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,
Deborah Wilson
408 Stonegate Ln
Dripping Springs, TX 78620

From: Janett cisneros <Janett.cisneros.484489823@p2a.co>
Sent: Wednesday, October 27, 2021 4:46 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Janett cisneros
1604 Lucas Terrace
Plano, TX 75074

From: John Monday <John.Monday.477902443@p2a.co>
Sent: Wednesday, October 27, 2021 4:44 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
John Monday
7807 S Rice Ave
Bellaire, TX 77401

From: Harrell King <Harrell.King.484489283@p2a.co>
Sent: Wednesday, October 27, 2021 4:40 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Harrell King
622 Largent Ave
Dallas, TX 75214

From: Pamela Evans <Pamela.Evans.462124641@p2a.co>
Sent: Wednesday, October 27, 2021 4:39 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Pamela Evans
101 W 9th St
Kemp, TX 75143

From: Jeffrey Pareja <Jeffrey.Pareja.484489247@p2a.co>
Sent: Wednesday, October 27, 2021 4:39 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Jeffrey Pareja
116 Mauldin St
Georgetown, TX 78628

From: Michael Fisher <Michael.Fisher.99625513@p2a.co>
Sent: Wednesday, October 27, 2021 4:39 PM
To: 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,
Michael Fisher
2669 Juniper Ln
Grapevine, TX 76051

From: Dennis Goldwood <Dennis.Goldwood.304147768@p2a.co>
Sent: Wednesday, October 27, 2021 4:39 PM
To: 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.

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.

Sincerely,
Dennis S. Goldwood
The Woodlands, TX. 77382

Regards,
Dennis Goldwood
76 W Sandalbranch Cir
Spring, TX 77382

From: Jessica Cain <Jessica.Cain.271778512@p2a.co>
Sent: Wednesday, October 27, 2021 4:26 PM
To: 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,

I implore you to keep in mind that you have chosen to represent your constituents. It is important that you represent our best interests over the interest of those that may offer personal funding.

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All gas facilities need to be weatherized.

Regards,
Jessica Cain
1929 Prospect St
Houston, TX 77004

From: Elvira Wu <Elvira.Wu.484488121@p2a.co>
Sent: Wednesday, October 27, 2021 4:24 PM
To: 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,
Elvira Wu
32111 Rolling Woods Trail
Fulshear, TX 77441

From: jane webb <jane.webb.484487942@p2a.co>
Sent: Wednesday, October 27, 2021 4:22 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
jane webb
4745 Ocean Dr
Corpus Christi, TX 78412

From: Elizabeth Riebschlaeger <Elizabeth.Riebschlaeger.7195972@p2a.co>
Sent: Wednesday, October 27, 2021 4:19 PM
To: 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,

Providing energy resources like natural gas to produce energy for Texans is a public social responsibility that brings with it accountability of the public and all public officials and private commercial interests involved in its production and delivery to the people under the Law. There is no other option.

This means supplying entities' investing in winterization and guaranteeing dependable delivery of natural gas in all conditions, without fail. (My good citizen mother, a Republican leader in her County and the State taught me that, "Only a fool makes the same mistake twice".) Texas voters do not abide fools in public office.

Any entity that cannot meet its responsibility to this mission should not be allowed to do private commercial business with public utility interests. Lives, state and national security, medical facilities, civic operations and public safety all depend on reliable delivery of natural gas, without fail.

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.

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All gas facilities need to be weatherized.

If such failures were to be repeated, then all Railroad Commissioners and other responsible officials, including the

Attorney General and yourself as Governor, should resign or face impeachment for failing to see that the above legal requirements established by the Legislature are met.

Neither the Texas Railroad Commission nor you have the authority to ignore your legal obligations under the Law passed by the Legislature, the People's Representatives and Senators. Then there is always the next election. Texans know the truth based on factual reports and, frankly, are fed up.

Regards,
Elizabeth Riebschlaeger
1603 E Brazos St
Victoria, TX 77901

From: Catherine Herbsleb <Catherine.Herbsleb.359609242@p2a.co>
Sent: Wednesday, October 27, 2021 4:19 PM
To: 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,
Catherine Herbsleb
1657 N Shore Dr
Port Isabel, TX 78578

From: Charles McHugh <Charles.McHugh.484487348@p2a.co>
Sent: Wednesday, October 27, 2021 4:16 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Charles McHugh
13903 McDannald Park Ln
Humble, TX 77396

From: Debra Otis <Debra.Otis.484487267@p2a.co>
Sent: Wednesday, October 27, 2021 4:15 PM
To: 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,
Debra Otis
12230 Perthshire Rd
Houston, TX 77024

From: Wayne Coltrane <Wayne.Coltrane.180335064@p2a.co>
Sent: Wednesday, October 27, 2021 4:13 PM
To: 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,
Wayne Coltrane
6904 Wesson Dr
Plano, TX 75023

From: Julia McAnelly <Julia.McAnelly.484486998@p2a.co>
Sent: Wednesday, October 27, 2021 4:11 PM
To: 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,
Julia McAnelly
1010 W 12th St
Brady, TX 76825

From: SHARON LUNDGREN <SHARON.LUNDGREN.245538698@p2a.co>
Sent: Wednesday, October 27, 2021 4:10 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
SHARON LUNDGREN
8609 Lupton Ln
Houston, TX 77055

From: Craig Wolcott <Craig.Wolcott.214209011@p2a.co>
Sent: Wednesday, October 27, 2021 4:07 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Craig Wolcott
806 Nicholson St
Houston, TX 77007

From: Kooi Suzanne <Kooi.Suzanne.463481220@p2a.co>
Sent: Wednesday, October 27, 2021 4:07 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Kooi Suzanne
5730 Mapleshade Ln
Dallas, TX 75252

From: Edward Margoscin <Edward.Margoscin.200021591@p2a.co>
Sent: Wednesday, October 27, 2021 4:04 PM
To: 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,
Edward Margoscin
2100 S Rainbow Ranch Rd
Wimberley, TX 78676

From: Pam Evans <Pam.Evans.462124641@p2a.co>
Sent: Wednesday, October 27, 2021 4:03 PM
To: 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,

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All gas facilities need to be weatherized.

Regards,
Pam Evans
101 W 9th St
Kemp, TX 75143

From: Carol Potter <Carol.Potter.484486015@p2a.co>
Sent: Wednesday, October 27, 2021 4:01 PM
To: 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,

Although our state leadership has excelled at deflecting responsibility for the weather disaster, we have not forgotten who is responsible. Please quit talking about the failures of wind energy and do what you're paid to do -- fix the real problems that contributed to the failures of the grid, which have been known for years.

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.

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All gas facilities need to be weatherized.

Regards,
Carol Potter
6808 Charlmont Cir
Dallas, TX 75248

From: Kurt Schultz <Kurt.Schultz.300364923@p2a.co>
Sent: Wednesday, October 27, 2021 4:00 PM
To: 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,
Kurt Schultz
3506 Ridgeway Cove
Lago Vista, TX 78645

From: Fredrick Crowdus <Fredrick.Crowdus.300811511@p2a.co>
Sent: Wednesday, October 27, 2021 3:59 PM
To: 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,
Fredrick Crowdus
3700 Preston Rd
Plano, TX 75093

From: Ermira Syla <Ermira.Syla.468111775@p2a.co>
Sent: Wednesday, October 27, 2021 3:57 PM
To: 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,
Ermira Syla
4733 Bluestone Rd
Krugerville, TX 76227

From: Helen Stringer <Helen.Stringer.463397422@p2a.co>
Sent: Wednesday, October 27, 2021 3:56 PM
To: 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,
Helen Stringer
385 Greatview Dr
Fredericksburg, TX 78624

From: Tom Byrne <Tom.Byrne.179849219@p2a.co>
Sent: Wednesday, October 27, 2021 3:54 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Tom Byrne
208 Waterford Dr
Victoria, TX 77901

From: Daren Dugan <Daren.Dugan.470232291@p2a.co>
Sent: Wednesday, October 27, 2021 3:53 PM
To: 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,
Daren Dugan
5800 Echo Bluff Dr
Haltom City, TX 76137

From: Duane Clementson <Duane.Clementson.114667393@p2a.co>
Sent: Wednesday, October 27, 2021 3:52 PM
To: 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,
Duane Clementson
10 Martin Ct
Houston, TX 77055

From: Helen Bolton <Helen.Bolton.484485359@p2a.co>
Sent: Wednesday, October 27, 2021 3:52 PM
To: 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,
Helen Bolton
1007 Vance St
Taylor, TX 76574

From: Jerry Jones <Jerry.Jones.30668232@p2a.co>
Sent: Wednesday, October 27, 2021 3:50 PM
To: 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,
Jerry Jones
7147 Bridges Ave
Richland Hills, TX 76118

From: Anthony Wagoner <Anthony.Wagoner.484484972@p2a.co>
Sent: Wednesday, October 27, 2021 3:48 PM
To: 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,
Anthony Wagoner
4214 Summer Wind Dr
Corpus Christi, TX 78413

From: Thomas St John <Thomas.StJohn.469922927@p2a.co>
Sent: Wednesday, October 27, 2021 3:47 PM
To: 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,
Thomas St John
1226 Lady Clare St
Rockport, TX 78382

From: Bobby Schiff <Bobby.Schiff.484484620@p2a.co>
Sent: Wednesday, October 27, 2021 3:43 PM
To: 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,
Bobby Schiff
6922 Flintcove Dr
Dallas, TX 75248

From: Christi Babbs <Christi.Babbs.484484602@p2a.co>
Sent: Wednesday, October 27, 2021 3:42 PM
To: 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.

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,
Christi Babbs
13806 Salem Ave
Lubbock, TX 79424

From: Matthew Bole <Matthew.Bole.477905215@p2a.co>
Sent: Wednesday, October 27, 2021 3:42 PM
To: 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,
Matthew Bole
103 Omaha Ct
Waxahachie, TX 75165

From: sherry andresen <sherry.andresen.28094296@p2a.co>
Sent: Wednesday, October 27, 2021 3:41 PM
To: 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,
sherry andresen
1022 Flagmore Dr
Katy, TX 77450

From: Sonja Ryberg <Sonja.Ryberg.8161860@p2a.co>
Sent: Wednesday, October 27, 2021 3:40 PM
To: 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,
Sonja Ryberg
2410 Bluffview Ct
Arlington, TX 76011

From: Vincent Marsales <Vincent.Marsales.359960251@p2a.co>
Sent: Wednesday, October 27, 2021 3:40 PM
To: 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,
Vincent Marsales
4729 Spellman Rd
Houston, TX 77035

From: Collin Decker <Collin.Decker.484484378@p2a.co>
Sent: Wednesday, October 27, 2021 3:40 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Collin Decker
E 3rd St
Denton, TX 76201

From: Robin Saywitz <Robin.Saywitz.484484323@p2a.co>
Sent: Wednesday, October 27, 2021 3:40 PM
To: 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,

In the storm from this past winter I lost power, heat, and had water pouring into my apartment due to a burst pipe. It was an unbelievably stressful time! Please do not allow the Railroad Commission's current proposed rule language allows any gas operator to opt-out of "critical infrastructure" designation. I urge you to require ALL gas operators to weatherize their equipment.

I don't have the financial means to go through this again. I can't believe after all the suffering our government would do essentially NOTHING to decrease the chances of another storm like that. Please reconsider and think of average residents of Texas rather than utility companies!

Regards,
Robin Saywitz
8000 Atlas Pear Dr
Bryan, TX 77807

From: Krisan Patterson <Kisan.Patterson.484484206@p2a.co>
Sent: Wednesday, October 27, 2021 3:38 PM
To: 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,
Krisan Patterson
6032 Royal Crest Dr
Dallas, TX 75230

From: Lindsay Forester <Lindsay.Forester.484483892@p2a.co>
Sent: Wednesday, October 27, 2021 3:35 PM
To: 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,
Lindsay Forester
1233 S Texas 6
Houston, TX 77077

From: Tania Hardage <Tania.Hardage.484483856@p2a.co>
Sent: Wednesday, October 27, 2021 3:35 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Tania Hardage
5022 Seneca Dr
Dallas, TX 75209

From: Dakshesh Patel <Dakshesh.Patel.463408410@p2a.co>
Sent: Wednesday, October 27, 2021 3:35 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Dakshesh Patel
5167 Kingfisher Dr
Houston, TX 77035

From: Christopher Cannon <Christopher.Cannon.484483766@p2a.co>
Sent: Wednesday, October 27, 2021 3:34 PM
To: 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,
Christopher Cannon
913 Colorado Dr
Allen, TX 75013

From: Janna Street <Janna.Street.463392607@p2a.co>
Sent: Wednesday, October 27, 2021 3:29 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Janna Street
5010 Williamsburg PI
Amarillo, TX 79119

From: Rob Carolla <Rob.Carolla.477937643@p2a.co>
Sent: Wednesday, October 27, 2021 3:28 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Rob Carolla
4104 Kirkmeadow Ln
Dallas, TX 75287

From: William Kuchar <William.Kuchar.359406832@p2a.co>
Sent: Wednesday, October 27, 2021 3:28 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
William Kuchar
8433 Raylin Dr
Houston, TX 77055

From: Leslie Mazina <Leslie.Mazina.359539321@p2a.co>
Sent: Wednesday, October 27, 2021 3:27 PM
To: 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,
Leslie Mazina
2701 Royal Creek Ct
Pearland, TX 77584

From: Margaret Schulenberg <Margaret.Schulenberg.81436585@p2a.co>
Sent: Wednesday, October 27, 2021 3:26 PM
To: 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,
Margaret Schulenberg
300 Pecan Ln
Round Rock, TX 78664

From: Leigh Rindt <Leigh.Rindt.484483072@p2a.co>
Sent: Wednesday, October 27, 2021 3:26 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Leigh Rindt
3418 Whirlaway Rd
Dallas, TX 75229

From: Michael DelGiudice <Michael.DelGiudice.92806401@p2a.co>
Sent: Wednesday, October 27, 2021 3:25 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Michael DelGiudice
2105 Pindos Pony Way
Georgetown, TX 78626

From: Pat Saxon <Pat.Saxon.7037599@p2a.co>
Sent: Wednesday, October 27, 2021 3:23 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Pat Saxon
618 Ridgedale Dr
Richardson, TX 75080

From: John Shannon <John.Shannon.484482866@p2a.co>
Sent: Wednesday, October 27, 2021 3:23 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
John Shannon
4021 Norhill Blvd
Houston, TX 77009

From: Billy Rogers <Billy.Rogers.110548083@p2a.co>
Sent: Wednesday, October 27, 2021 3:23 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Billy Rogers
6001 Madelyn Mews
North Richland Hills, TX 76180

From: Sara Meyer <Sara.Meyer.484482811@p2a.co>
Sent: Wednesday, October 27, 2021 3:23 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Sara Meyer
212 E Main St
Cuero, TX 77954

From: Rachael Vidal <Rachael.Vidal.51444020@p2a.co>
Sent: Wednesday, October 27, 2021 3:20 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Rachael Vidal
2108 Van Horn Cove
Cedar Park, TX 78613

From: Lisa Stout <Lisa.Stout.30682038@p2a.co>
Sent: Wednesday, October 27, 2021 3:20 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Lisa Stout
22223 Spring Crossing Dr
Spring, TX 77373

From: Richard Cate <Richard.Cate.82034067@p2a.co>
Sent: Wednesday, October 27, 2021 3:20 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Richard Cate
2815 Tanglewood St
Houston, TX 77005

From: Matthew Lum <Matthew.Lum.484482622@p2a.co>
Sent: Wednesday, October 27, 2021 3:20 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Matthew Lum
3102 Norhill Blvd
Houston, TX 77009

From: Robert Watson <Robert.Watson.463431810@p2a.co>
Sent: Wednesday, October 27, 2021 3:19 PM
To: 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,
Robert Watson
3501 Marwick Dr
Plano, TX 75075

From: Carolyn Cruz <Carolyn.Cruz.179841677@p2a.co>
Sent: Wednesday, October 27, 2021 3:19 PM
To: 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,
Carolyn Cruz
4020 W 5th St
Fort Worth, TX 76107

From: Mark Lee <Mark.Lee.463389926@p2a.co>
Sent: Wednesday, October 27, 2021 3:17 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Do Your Job!

Regards,
Mark Lee
6809 Curtis Rd
Colleyville, TX 76034

From: Yvonne Jacobs <Yvonne.Jacobs.179608469@p2a.co>
Sent: Wednesday, October 27, 2021 3:17 PM
To: Rules Coordinator
Subject: 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,
Yvonne Jacobs
2831 Jarrard St
Houston, TX 77005

From: Nancy Monroe <Nancy.Monroe.179767111@p2a.co>
Sent: Wednesday, October 27, 2021 3:15 PM
To: 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,
Nancy Monroe
408 Highland Way
Coppell, TX 75019

From: Patricia Paget <Patricia.Paget.484482127@p2a.co>
Sent: Wednesday, October 27, 2021 3:15 PM
To: 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,
Patricia Paget
5251 Creekbend Dr
Houston, TX 77096

From: Brian Richardson <Brian.Richardson.95136501@p2a.co>
Sent: Wednesday, October 27, 2021 3:14 PM
To: 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,
Brian Richardson
16055 Hidden Acres Dr
Houston, TX 77084

From: Sara parnell <Sara.parnell.484482064@p2a.co>
Sent: Wednesday, October 27, 2021 3:14 PM
To: 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,
Sara parnell
460 Grace Dr
Coppell, TX 75019

From: Jane Miller <Jane.Miller.484482046@p2a.co>
Sent: Wednesday, October 27, 2021 3:14 PM
To: 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,
Jane Miller
509 Lakeview Blvd
New Braunfels, TX 78130

From: Lisa Stone <Lisa.Stone.230044412@p2a.co>
Sent: Wednesday, October 27, 2021 3:12 PM
To: 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,
Lisa Stone
8902 Birdwood Ct
Houston, TX 77096

From: Linda Kemper <Linda.Kemper.463390825@p2a.co>
Sent: Wednesday, October 27, 2021 3:11 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Linda Kemper
1426 Stonecrest Dr
Houston, TX 77018

From: Michael O'Neil <Michael.ONeil.484481650@p2a.co>
Sent: Wednesday, October 27, 2021 3:09 PM
To: Rules Coordinator
Subject: Require all gas facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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Regards,
Michael O'Neil
15123 Pebble Bend Dr
Houston, TX 77068

From: Amanda Wilson <Amanda.Wilson.60970116@p2a.co>
Sent: Wednesday, October 27, 2021 3:09 PM
To: 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,
Amanda Wilson
405 Dial St
Jacksonville, TX 75766

From: Jane Clark <Jane.Clark.31132145@p2a.co>
Sent: Wednesday, October 27, 2021 3:08 PM
To: 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. No "opting out".

Regards,
Jane Clark
1302 Warbler Dr
Kerrville, TX 78028

From: Denise Yonemoto <Denise.Yonemoto.484481489@p2a.co>
Sent: Wednesday, October 27, 2021 3:08 PM
To: 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,
Denise Yonemoto
23007 Palm Trail Dr
Katy, TX 77494

From: Dave Smith <Dave.Smith.121500911@p2a.co>
Sent: Wednesday, October 27, 2021 3:07 PM
To: 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,
Dave Smith
812 Arlington St
Houston, TX 77007

From: Catherine Staggs <Catherine.Staggs.179666384@p2a.co>
Sent: Wednesday, October 27, 2021 3:06 PM
To: 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,
Catherine Staggs
6535 Grovewood Ln
Houston, TX 77008

From: Don Mummert <Don.Mummert.484481218@p2a.co>
Sent: Wednesday, October 27, 2021 3:05 PM
To: 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,
Don Mummert
4425 Edmondson Ave
Dallas, TX 75205

From: Billy eadum <Billy.eadum.484481173@p2a.co>
Sent: Wednesday, October 27, 2021 3:04 PM
To: Rules Coordinator
Subject: 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,
Billy eadum
13545 Catamaran Dr
Corpus Christi, TX 78418

From: Barb Morill <Barb.Morill.484481056@p2a.co>
Sent: Wednesday, October 27, 2021 3:02 PM
To: 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,
Barb Morill
1430 Montgomery Ln
Southlake, TX 76092

From: helen hext <helen.hext.484480958@p2a.co>
Sent: Wednesday, October 27, 2021 3:01 PM
To: 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,
helen hext
10010 Kempwood Dr
Houston, TX 77080

From: Yunshan Liu <Yunshan.Liu.484480796@p2a.co>
Sent: Wednesday, October 27, 2021 3:00 PM
To: 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,
Yunshan Liu
95 Dulcet Hollow Ct
Spring, TX 77382

From: Peter Caldwell <Peter.Caldwell.484480723@p2a.co>
Sent: Wednesday, October 27, 2021 2:59 PM
To: 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,

Despite the attempts to distract attention with populist grandstanding, the challenge of the ERCOT disaster remains in the public eye.

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All gas facilities need to be weatherized.

Regards,
Peter Caldwell
2012 Arlington St
Houston, TX 77008

From: Diane Hummel <Diane.Hummel.484480633@p2a.co>
Sent: Wednesday, October 27, 2021 2:58 PM
To: 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,
Diane Hummel
188 Black Oak Dr
Canyon Lake, TX 78133

From: Frank Blake <Frank.Blake.35984506@p2a.co>
Sent: Wednesday, October 27, 2021 2:55 PM
To: 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,
Frank Blake
1010 Peden St
Houston, TX 77006

From: Pollyanna Hopson <Polyanna.Hopson.484479266@p2a.co>
Sent: Wednesday, October 27, 2021 2:46 PM
To: 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,
Pollyanna Hopson
103 Yacht Ct
Lakeway, TX 78734

From: Patricia Sealls <Patricia.Sealls.463389908@p2a.co>
Sent: Wednesday, October 27, 2021 2:43 PM
To: 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,
Patricia Sealls
117 Wooden Lodge Dr
Manchaca, TX 78652

From: Mary Johns <Mary.Johns.74755598@p2a.co>
Sent: Wednesday, October 27, 2021 4:59 PM
To: 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,
Mary Johns
18027 Longcliffe Dr
Houston, TX 77084

From: Jennifer Hilliard <Jennifer.Hilliard.444352774@p2a.co>
Sent: Wednesday, October 27, 2021 4:09 PM
To: Rules Coordinator
Subject: Require all NATURAL GAS facilities to weatherize (16 TAC §3.65 and §3.107 public comments)

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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,
Jennifer Hilliard
904 N Sandpiper
Ingleside, TX 78362

From: Martha Eberle <Martha.Eberle.463481554@p2a.co>
Sent: Wednesday, October 27, 2021 3:50 PM
To: 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. Give me a break!!! **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. With climate change a REALITY!!!, 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 -- that is why you are here, to protect us, not to protect the businesses that republicans are known for!!!

All gas facilities need to be weatherized.

Regards,
Martha Eberle
2525 McGregor Ln
Dripping Springs, TX 78620

From: Stephen Krebs <info@email.actionnetwork.org>
Sent: Wednesday, October 27, 2021 8:01 AM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Railroad Commission of Texas ,

I am writing to comment on the proposed rule for 16 TAC §3.65 and §3.107 (new rule and amendment per SB 3 and HB 3648).

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. This is the costliest natural disaster in Texas history. A preliminary assessment by the Federal Energy Regulatory Commission and the North American Electric Reliability Corporation (NERC) showed 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.

Stephen Krebs
skrebs@outlook.com

Houston , Texas 77030

From: Bryan Hurt <info@email.actionnetwork.org>
Sent: Wednesday, October 27, 2021 2:48 PM
To: Rules Coordinator
Subject: 16 TAC §3.65 and §3.107 - Comment on weatherization rule

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Bryan Hurt
bchurt@gmail.com
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From: Richard Maddern [REDACTED]
Sent: Wednesday, October 27, 2021 4:21 PM
To: Rules Coordinator
Subject: Comment on Proposed Critical Infrastructure Rule

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Dear Railroad Commission of Texas rulemaking,

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

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

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

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

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

Sincerely,
Richard Maddern
717 Link Dr
Kingsland, TX 78639

From: Catherine Tully <Catherine.Tully.463422414@p2a.co>
Sent: Wednesday, October 27, 2021 4:10 PM
To: Rules Coordinator
Subject: Do Your Job: 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. Protect citizens - not corporations.

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,
Catherine Tully
5214 Grape St
Houston, TX 77096