



CEP RECOMMENDATIONS STATUS UPDATE
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CPS Energy’s management team will continue its cooperation and focus on needed operational improvements. Its Board Operations Oversight Committee (OOC) and its Technology & Resilience Committee (TRC) will continue to oversee management’s plans and actions in making those improvements.

Recommendations Summary#	Total	CPS	SAWS	EOC
	37	18	5	14

Represents a breakdown of the total number of recommendations we are tracking

Recommendation Status Summary*	Not Started	Initiated	In-Progress	Completed
		31	6	

* Recommendation Status definitions included in Appendix

CEPR CPS 1.A - CPS Energy and the City of San Antonio join with other cities, municipal utilities, and rural electric cooperatives to develop and propose legislation in the 2023 legislative session to accomplish the following: <i>require all generators and marketers on the ERCOT grid to maintain a prescribed level of reserve capacity from base load plants, dispatchable plants or energy storage facilities with direct ownership of generation capacity or firm contractual agreements with generators</i>	
Status: Initiated	Update: In response to this recommendation, CPS Energy is engaging in a number of Public Utilities Commission (PUC) rulemakings and Electric Reliability Council of Texas (ERCOT) protocol revisions that address energy market redesign with a focus on ensuring that the market moves away from a crisis-based model to a more conservative model focused on reliability. The PUC & ERCOT are under charge from Governor Abbott to reform the ERCOT wholesale market, as well as, implementing legislation passed during the 87th Regular Legislative Session. Reserve capacity is a focal point in these policy discussions. We are participating in the rulemaking proceedings through our statewide trade association, working with industry market participants and participating in the ERCOT stakeholder process. The development of an action plan to address this recommendation is “Ongoing” as rulemakings are in process and new rulemakings are being opened. The PUC plans



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	to determine its market redesign direction by December, with additional activity and rule changes expected in 2022. (Please refer to the attached CPS Energy Post-Winter Storm Uri Rulemaking Tracker for additional details, particularly Project 52373.)
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CEPR CPS 1.B - CPS Energy and the City of San Antonio join with other cities, municipal utilities, and rural electric cooperatives to develop and propose legislation in the 2023 legislative session to accomplish the following: *require the State of Texas to make the investment to connect the ERCOT grid to the larger grids east and west of Texas*

Status: Initiated	Update: In response to this recommendation, our Government Relations team, working with our senior leaders, provides some insightful historical context while there continues to be discussions on increasing our current connections to other grids, consideration to fully integrate into other grids, at least connecting the eastern and western interconnects, was abandoned as an option many years ago because of the significant cost and scope of integrating with either the east OR western interconnects. Meanwhile, CPS Energy will continue to monitor policy discussions and suggests that policy discussions in 1.A are a preferred approach to addressing reliability and resiliency. Where feasible, we will engage in activity to increase the existing connections if the connections are beneficial to reliability and are cost effective. Although we completed our short-term assessment, we will continue to assess this on a long-term basis. (Please refer to the attached CPS Energy Post-Winter Storm Uri Rulemaking Tracker for additional details, particularly Project 52373.)
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CEPR CPS 1.C - CPS Energy and the City of San Antonio join with other cities, municipal utilities, and rural electric cooperatives to develop and propose legislation in the 2023 legislative session to accomplish the following: *require the State of Texas to guarantee loans for all generators, transporters or marketers on the ERCOT grid to build or contract for required capacity which can supply firm dispatchable supplies from generation plants or energy storage facilities to the ERCOT grid during a natural disaster or extreme weather conditions.*

Status: Initiated	Update: In response to this recommendation, CPS Energy learned that the PUC as part of their market redesign initiatives, is evaluating market incentives to increase the capacity of firm and dispatchable sources of generation. The PUC has focused on leveraging the exiting market construct and is contemplating making meaningful changes that will meet the goals of increased reliability of the generation system. CPS Energy will monitor policy discussions and engage in rulemaking proceedings that impact the market, but at this time creating a loan program to
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	<p>incent firm and dispatchable generation is counter to the established direction of the PUC, who has ultimate authority over the electric markets. If successful, the PUC’s market redesign will accomplish this goal without the additional cost of servicing the loans suggested in this item. Any outcomes realized regarding this recommendation are connected to Item 1.A, which is the PUC plans to determine its market redesign direction by December 2021 with additional activity and rule changes expected in 2022. (Please refer to the attached CPS Energy Post-Winter Storm Uri Rulemaking Tracker for additional details, particularly Project 52373.)</p>
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<p>CEPR CPS 2 - CPS Energy reevaluate their strategies and procedures for purchasing and transporting natural gas to assure adequate supplies of natural gas are available to their natural gas generation units critical for firming capacity during a crisis and for natural gas distribution to customers for heating.</p>	
<p>Status: Initiated</p>	<p>Update: CPS Energy continues to procure the amount of natural gas needed to ensure adequate supplies of natural gas are available to our natural gas-fired generation units and for natural gas distribution to customers for needs such as heating. However, we have reviewed the recommendation from the Committee on Emergency Preparedness (CEP) and are evaluating the recommendations as part of the periodic reviews that we conduct on our commodity risk management strategies and procedures. We anticipate completing the reviews and taking any appropriate action by late fall.</p>

<p>CEPR CPS 3 - CPS Energy and the City of San Antonio join with other cities, municipal utilities, and rural electric cooperatives to develop and pass legislation in the 2023 legislative session to eliminate the ability for the PUCT through ERCOT to artificially manipulate the price of electric power and ancillary services on the grid and only allow ERCOT to have administrative and “clearing” authority over next day prices, real-time prices, and ancillary services on the grid.</p>	
<p>Status: Initiated</p>	<p>Update: In response to this recommendation, CPS Energy is engaging in a number of PUC rulemakings and ERCOT protocol revisions that address energy market redesign which includes energy market pricing. The PUC & ERCOT are under charge from Governor Abbott to reform the ERCOT wholesale market, as well as, implementing legislation passed during the 87th Regular Legislative Session. The goal of the PUC is to move away from the crisis-based model to a more conservative market structure that will no longer require such extreme regulatory intervention. We are participating in the rulemaking proceedings through our statewide trade association, working with industry market participants and participating in the ERCOT stakeholder process. In June, the PUC modified the value of the low system-</p>



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	<p>wide offer cap (LCAP) in ERCOT by eliminating a provision that ties the value of the LCAP to the natural gas price index. Specifically, the LCAP is now set at a flat \$2,000/MWh. Additionally, CPS Energy is addressing the excessive, illegitimate, and illegal power prices the utility was charged during Storm Uri through its legal claims against ERCOT for its lack of oversight, preparedness, and failure to follow its own protocols that resulted in \$16 billion in overcharges to market participants and customers. This effort is ongoing as rulemakings are in process and new rulemakings are being opened. Any outcomes realized regarding this recommendation are connected to Item 1.A, which is the PUC plans to determine its market redesign direction by December 2021 with additional activity and rule changes expected in 2022. Market pricing and market pricing safety valves are expected to be addressed as part of this process. (Please refer to the attached CPS Energy Post-Winter Storm Uri Rulemaking Tracker for additional details, particularly Project 52373.)</p>
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<p>CEPR CPS 4 - CPS Energy should emphasize and refocus on their long and distinguished history of operational excellence. From the outside, one can see how the historical winter storm exposed numerous operational problems across the fleet. However, it is the job of the Board of Trustees and the CPS Energy management to build the team to control what they can control, which is the generation, transmission, and distribution of electric power, and the purchase and distribution of natural gas.</p>	
<p>Status: In-progress</p>	<p>Update: In response to this recommendation, CPS Energy’s Power Generation will drive weatherization and fleet improvements to refocus on operational excellence of our plants for improved reliability & resiliency. As such, our Power generation group is moving forward with 3 initiatives this year to improve plant performance:</p> <ol style="list-style-type: none"> 1) We are implementing a 9-point weatherization improvement plan in preparation for the 2021-2022 winter season by December 2021. These activities are being managed on a plant-specific basis and work has started at each site. 2) We are evaluating upgrade of aging burner systems & upgrading fan control systems. Spruce fan control system upgrade is in progress and will be completed by December 2021. Braunig burner system evaluations are underway to identify potential upgrades with work planned for 2022.



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	<p>3) We have developed unit outage plans that will maximize CPS Energy's unit availability during December through February. These plans have been approved for CY 2021-2022 outage season beginning this October 2021.</p> <p>The South Texas Project team is also taking the following actions to improve plant performance:</p> <ol style="list-style-type: none"> 1) Detailed inspection of all outside piping to ensure plant freeze protection is configured as designed and will upgrade as necessary by December 2021. 2) Implement a revised Freeze Protection Program that has a single owner, enhanced procedures, processes and database to track plant component and piping heat trace systems by December 2021. <p>Jose Alvarez Continuous Improvement Consulting has been contracted to perform an independent assessment and review of weatherization and resiliency programs including post-Uri updates.</p> <ol style="list-style-type: none"> 1) Detailed assessments will be conducted for all weather-related functions at each location. 2) All assessments will be made relative to the Public Utility Commission's established cold weather protection standard. <p>We expect to finalize and submit this action plan by December 15, 2021.</p>
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CEPR CPS 5 - CPS Energy should revisit and upgrade the automated rotating outages program so that it is capable of handling larger load shed requirements.	
Status: In-progress	<p>Update: Based on the CEP recommendation, we have initiated actions to ensure systems and processes are in place to manage a Uri like event should it occur in the 2021-22 winter season and pursue further improvements through technology and advanced infrastructure. These include the following actions:</p> <ol style="list-style-type: none"> 1) Implement improvements in existing systems and infrastructure to manage an ERCOT load shed event of at least 20,000 MW for winter 2021-22. <i>Initial updates to the system have been implemented that target brief (15 minute) rolling outages for a large portion of customers that we believe would function in an event</i>



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	<p><i>similar to that of last winter. This included updates to our control system software and changes to the critical circuit designations.</i></p> <p>2) Increase load shed capacity through re-assessment of critical circuits and Under-Frequency Load Shed (UFLS) circuits to ensure only the most critical loads are exempted so that the impact to all customers is minimized. <i>A significant reassessment was performed on the critical circuit listing to minimize critical circuits to only those few most critical loads in order to minimize system wide impact. Also see CEPR CPS 6.</i></p> <p>3) Review and update the Load Shed operating procedures to incorporate lessons learned from this past winter event and strengthen actions required to manage such an event. <i>Updates have been made to the load shed procedure are in progress and will be issued prior to the 2021-22 winter season.</i></p> <p>4) Perform modeling and assessment of improvements made for winter 2021-22 to ensure sufficiency. Incorporate a third-party review of improvements for independent feedback and to ensure a valid plan. <i>Internal modeling and assessment have been performed and the third-party assessment is in progress.</i></p> <p>5) At the conclusion of PUC rulemaking ensure our programs meet the updated requirements for Load Shed and definition of critical customers. Reassess with use off third party consultant. <i>On-hold for PUC rulemaking process.</i></p> <p>6) Pursue technology and infrastructure improvements over the long term, with funding, to improve the flexibility of the transmission and distribution systems to better target load shed across system to support more "critical customer" exemptions while spreading load reductions across the entire system. This may be through the Advanced Metering Infrastructure (AMI), Distribution Automation (DA), or other programs. <i>We have several efforts in progress including assessment of options through our AMI vendor. We are actively assessing options for DA projects that would allow shedding of partial circuits which would allow us to better work around critical loads in the system.</i></p>
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CEPR CPS 6 - CPS Energy should review the options to reduce the size of critical circuits, shift non-critical customers into interruptible circuits, and increase the number of interruptible circuits by reducing the size of non-interruptible circuits. This review of critical circuit load should be undertaken regularly and in coordination with other major critical service providers, such as fire departments, SAWS, and emergency shelter providers.

Status: In-progress

Update: A major first effort has been performed to increase the load shed capacity (and the associated reduced impact to the average customer) through exempting only the most critical loads in the system. These criteria will be reassessed based on guidance expected from the PUC later this year. We are looking for options where circuits might be reconfigured to accomplish the same goal of increasing load shed capacity but creating larger circuits has the downside of generally reducing the average reliability for those customers. This may also create loading issues that were experienced in Uri creating challenges in returning circuits to service after they were shut off. As such, our focus here is captured in item 6 of CEPR CPS 5 where we are working to apply additional sub-circuit switching and DA technology to increase controllability. This will be a longer-term infrastructure investment.

CEPR CPS 7 - CPS Energy should review opportunities to supply power to SAWS pump stations and other critical infrastructure where critical circuits are not available or to feed these locations from dual circuits.

Status: Initiated

Update: In response to this recommendation, we have worked with SAWS to identify Tier 1 critical pump stations and reviewed circuit configurations serving these loads to identify resiliency improvement opportunities. SAWS has provided CPS Energy a ranking of their pump stations by tiers. The Tier 1 stations (most critical) all currently have redundant feeds and the primary feed has been given critical load. We are currently analyzing opportunities for improving resiliency of other sites with SAWS and identifying potential upgrades of sites. Staff is reviewing redundancy options to increase resiliency for these critical sites. We are also working with SAWS in their efforts to develop a backup generation plan to meet new state requirements for water systems.

CEPR CPS 8 - Develop a cohesive, comprehensive, and clear emergency communications protocol in collaboration with the City of San Antonio Emergency Operations Center with input from community professionals. In developing the protocol, CPS Energy should consider: **A)** Tailoring messaging to what is most critical for the customer's service and safety and focus on what is most relevant to the organization's mission.; **B)** Evaluating the effectiveness of calls for



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conservation and consider how effectiveness can be enhanced, by modifying timing, communication methods, and perhaps even reporting real time progress on conservation.	
Status: Initiated	<p>Update: CPS Energy is reviewing its Crisis Communications plan and it will be updated to include the considerations outlined in the CEP. We recently submitted to CoSA and EOC partners, a detailed color-coded chart that identifies corresponding communications action for various outage and ERCOT mandated emergency levels. This aligns with actions CPS Energy takes at various outage and ERCOT mandated emergency levels. We are also having our outside public relations agency review to make suggestions. We expect to complete this action plan by October 11, 2021. (Please refer to the attached CPS Energy Operational Readiness Matrix.)</p> <ul style="list-style-type: none"> A. CPS Energy is reviewing its Crisis Communications plan and it will be updated to include the considerations outlined in the CEP. Safety is a key message in our outage communication. We expect to finalize and submit this action plan by October 11, 2021. This will include review and insight of our plan by outside communications consultants. B. The Communications team has worked with the broader Outage Communication team to develop actions for various levels of needs for conservation. Our Summer campaign focused on simple ways customers can save energy. This included reporting of energy saved during partner newscasts. While our Summer campaign runs through September 20, 2021, our Year-round conservation messaging will continue.

CEPR CPS 8.C - Issuing an advance notification process to contact each customer when there is a risk of mandatory load shed and rolling outages. These notifications should: 1) Be coordinated with the emergency operations center; 2) Be provided with a reasonable advance notice to prepare and make alternative arrangements; 3) Indicate if customer is on a circuit that is NOT critical and may lose power if rolling outages occur (only possible if notifications are personalized by account); and 4) Advise what the customer should do if they lose power, such as places they can go or whom to call for assistance.	
Status: Initiated	<p>Update: Our Crisis Communications plan is being updated to include this recommendation.</p> <ul style="list-style-type: none"> 1) Our Crisis Communications plan is being updated to include this recommendation.



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	<p>2) Our Crisis Communications plan is being updated to include this recommendation.</p> <p>3) CPS Energy will discuss taking this into consideration based on Safety & Security concerns with releasing information of this nature.</p> <p>4) Our Crisis Communications plan is being updated to include these considerations. We have put this into action with summer storms.</p> <p>We expect to finalize and submit this action plan by October 11, 2021</p>
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CEPR CPS 9 - In concert with City and other local agencies develop and implement an emergency readiness year-round campaign, building out the framework of Ready South Texas. The aim should be that residents know how to prepare for an emergency as well as they know the number 911.	
Status: Initiated	Update: CPS Energy is sharing information for September’s Emergency Preparedness Month. We will also support the collaborative efforts with our partners. We will also work with the City and local agencies to support the year-round campaign. Next steps will include to coordinate a meeting to discuss these efforts. We expect to finalize and submit this action plan by the end of November 2021.

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SAWS Recommendations Applicable to CPS Energy Status Update

CEPR SAWS 2 - In conjunction with CPS Energy, identify and place infrastructure required to maintain water and sewer operations to critical facilities on uninterruptible circuits in order to avoid service interruptions.	
Status: Initiated	Update: In response to this recommendation, we will coordinate with SAWS and evaluate additional infrastructure required along with the load shed capabilities that could be created through reclosers, existing or new, and other equipment on CPS Energy critical circuits. The final solution will be accomplished in two phases. In Phase I, we will incorporate existing equipment into control systems & system operations procedures. In Phase II, we will develop a stage plan for proposed equipment to be deployed on critical circuits. We are developing a visual map and excel table to help identify the critical facilities. We are using circuit configurations and critical load locations for circuit modeling and analysis. Additionally, we are conducting project planning and coordinating meetings with system operations and communications engineering. We expect to finalize and submit the action plan associated with this recommendation by October 15, 2021.
CEPR SAWS 3 - Coordinate with CPS to determine which SAWS locations must have power generators and/or fuel storage for load reduction events and consider shared uses for generators.	
Status: Initiated	Update: SAWS has provided CPS Energy with a list of critical locations. We are working with SAWS to identify best methods to support resiliency for these locations, including but not limited to redundancy, onsite generation, conservation, etc. We worked with an outside vendor that provided a natural gas generator solution to critical stations. This vendor presented potential business solutions to SAWS. SAWS also worked with an established CPS Energy resiliency generator customer to share lessons learned. We worked collectively with SAWS to identify Critical sites and have strategically set no shed / Under Frequency Load Shed (UFLS) designations accordingly. We also supported SAWS in the development of a conservation plan that aligns with ERCOT Energy Emergency Alert (EEA) matrix for about 25MW. We will continue to have routine engagements with SAWS. From a strategic standpoint, placing SAWS within our Load Shed program will support resiliency and provide them



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	additional time to budget and secure generators for critical locations.
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CEPR SAWS 5 - Perform routine disaster scenarios with CPS Energy and with the City EOC, such as natural disaster and terrorist attack response simulations. In addition to tabletop exercises, conduct in-person field exercises. The exercises should include City Council members and their staff when appropriate.

Status: Initiated	Update: CPS Energy partnered with the city EOC and SAWS on their efforts in planning exercises with natural disaster scenarios. CPS Energy coordinated with the CoSA San Antonio Office of Emergency Management (SAOEM), SAWS and CPS Energy and Texas A&M Engineering Extension Service (TEEX). We began planning the training and table top exercise in August. The scenarios and exercise game plan were finalized on September 13, 2021. CoSA’s table top exercise will be held on September 28, 2021. CoSA, SAWS, Bexar County and other applicable entities will be participating. CPS Energy and SAWS also partnered and conducted a table top exercise involving natural disasters hosted by Black and Veatch on July 7, 2021. This exercise highlighted the need for clear communication between SAWS and CPS and was attended by the operations management of both utilities. CPS Energy will invite the above entities and elected officials to participate in GridEx. GridEx is a distributed play grid exercise that allows participants to engage remotely, simulates a cyber and physical attack on the North American electricity grid and other critical infrastructure. The planning began in early July. GridEx tabletop will be on November 16, 2021 and November 17, 2021. The training will be held via WebEx due to COVID concerns and the number of participants attending. Once the table tops are complete, we will share the training documents built for the table tops and give participant feedback of the exercises. The natural disaster training will be completed on September 28, 2021 and the security attack on the grid (GridEx) training will be complete November 17, 2021. Both types of training will be repeated yearly. Our Staff has met with CoSA, SAWS and TEEX and finalized all training materials for the natural disaster scenario. We are ready for the table top exercise. GridEx scenarios have been completed and we are ready for the table top exercise.
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CEPR SAWS 8 - Develop systems and protocols to have one coordinated messaging channel between EOC, SAWS, and CPS Energy for emergencies.

Status: Initiated	Update: This protocol will be included in our updated Crisis Communications plan and will be aligned with the work of the Joint Information Center at the EOC. We recently submitted to CoSA and EOC partners, a detailed color-coded chart that
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	<p>identifies corresponding communications action for various outage and ERCOT mandated emergency levels. This aligns with actions CPS Energy takes at various outage and ERCOT mandated emergency levels. We are also having our outside public relations agency review to make suggestions. We look forward to the feedback from our partners. (Please refer to the attached CPS Energy Operational Readiness Matrix.)</p>
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<p>CEPR SAWS 16 - SAWS and CPS Energy should meet to discuss CPS Energy’s compliance with Chapter 25 Subsection C (Infrastructure and Reliability) of the Public Utility Commission’s Electric Substantive Rules and discuss the role of SAWS in respect to these compliance measures.</p>	
<p>Status: Initiated</p>	<p>Update: CPS Energy and SAWS have met to discuss CPS Energy’s compliance with Chapter 25 Subsection C (Infrastructure and Reliability) of the Public Utility Commission’s Electric Substantive Rules. Based upon the meetings, SAWS believes that CPS Energy is fulfilling their obligations per the understanding of the Rules. CPS Energy and SAWS has developed a Charter to address impacts of energy emergency events, and to draft a plan identifying SAWS facilities and corresponding megawatt reduction with a tier-based structure based upon load shed requirements. To date, (CEPR CPS 7), SAWS has identified Tier 1 critical pump stations and reviewed circuit configurations serving these loads to identify resiliency improvement opportunities. SAWS has provided CPS Energy a ranking of their pump stations by tiers. The Tier 1 stations (most critical) all currently have redundant feeds and are now exempted from load shed. CPS Energy will continue to monitor and draft changes to definitions with Chapter 25 Subsection C of the Public Utility Commission’s Electric Substantive Rules.</p>

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EOC Recommendations Applicable to CPS Energy Status Update

<p>CEPR EOC 1 - Update the Hazard Mitigation Plan (HAP) to include planning for a prolonged winter storm event, prolonged power outages, prolonged water outages, and a combination of the previous three events.</p>	
<p>Status: Initiated</p>	<p>Update: The City of San Antonio’s Hazard Mitigation Action Plan (HAP) is a single jurisdictional Plan. Numerous entities and businesses participated as stakeholders in the Plan, including CPS Energy and numerous other public and private entities. These groups provide valuable input into the planning process. CPS Energy has participated in the HAP for years. CPS Energy will participate in the next HAP when started by CoSA. We will work to include planning for a prolonged winter storm event, prolonged power outages, prolonged water outages, and a combination of the previous three events. We will work with CoSA and provide a completion date. However, CPS Energy will participate in the HAP process like it has done for years.</p>
<p>CEPR EOC 2 - Identify backup devices to cellphones and other mobile devices. 4G towers are more reliable than 5G towers, which will fail during major power outages. Be familiar with the plan with COSA telephone and data service providers for the transition to emergency services in the event of provider outages.</p>	
<p>Status: In-progress</p>	<p>Update: In response to this recommendation, we will have Three Options being studied and researched. The final plan will be a combination of 2 or 3 of these options. One and Two only or One, Two and Three</p> <ol style="list-style-type: none"> 1. Using Verizon 4G LTE operating on Verizon’s version of ATTs FirstNet called Frontline. Moving to Frontline leverages the Verizon purpose conditioned 4G LTE network specifically setup for priority, and preemptive service for the users. This option would allow business continuity using Verizon’s cellular voice and data service. 2. Using Harmony / Enhanced Digital Access Communications Systems (EDACS) until Alamo Area Regional Radio System (AARRS) is operational. As an alternative for Cellular given Operations will be using this option for their coordination efforts. The complexity is having the users not accustomed to using P25 radios get proficient along with distribution and periodic real use tests.



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	<p>3. Using existing Satellite phones. Satellite phones only support voice, Satellite modems are required for data service.</p> <p>To insure we are fully prepared our approach will be to recommend we develop an Incident Action Plan (IAP) and create an Incident Radio Communications Plan (ICS-205). The purpose of the IAP and ICS-205 is to create a plan with a method of procedure identifying initial primary means of communications for business continuity including contact information list and directory for personnel assigned to Incident Management. For example, the IAP would identify at the start of any event for the Chiefs and Leaders that 4G LTE communications would be default and when the situation arose where the Cellular network might become inoperative everyone would pivot to P25 radios. The plan would detail cellular voice and data capabilities and include P25 radio talk groups with the assignment of radio resources to CPS employees during any incident. This would include all radio assignments down to the division / group level during any incident. Radio handsets would be pre assigned maintained and distributed during any incident when the IAP is activated. However, P25 won't provide data nor will Satellite phones so all three options will need to be considered for purpose. Draft IAP is being created. Verizon's capabilities are being reviewed. Existing Satellite phones cost locations and readiness is being researched.</p>
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<p>CEPR EOC 3 - Prioritize the purchase of generators to ensure key city facilities are able to operate during a major winter or heat event.</p>	
<p>Status: Initiated</p>	<p>Update: In response to this recommendation, SAWS has identified critical locations and we are working with them to identify best methods to support resiliency for these locations. That may include service redundancy, generators, load shed tier ranking, etc. SAWS is requesting to have time to work on their own processes. We will continue to have bi-weekly engagement with SAWS and have identified critical locations that will be placed on specific no load shed/ load shed circuit reports. Strategically placing SAWS within our Load Shed program will support resiliency and provide them additional time to budget and secure generators for critical locations. We will also continue to identify additional resiliency opportunities as we explore tried and true & new products that can support SAWS critical energy needs. We expect to submit the action plan associated with this recommendation in late November 2021.</p>



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CEPR EOC 8 - Identify contingency plans for catastrophic incidents where a significant percentage of workers are not able to work remotely due to power outages.	
Status: Initiated	Update: CPS Energy works with the city EOC and SAWS to plan disaster scenarios and then participates with SAOEM (EOC) in exercises addressing those scenarios. We will work with the EOC creating plans for catastrophic incidents where a significant percentage of workers are not able to work remotely due to power outages. We will then exercise those scenarios. We have already planned and outlined the training for the remainder of this year and will add these scenarios to future training. Once the table tops are complete, we will share the training documents built for the table tops and give participant feedback of the exercises. These types of training will be repeated yearly. Our Staff meets with CoSA, SAWS, the Texas Department of Emergency Management (TDEM) and others monthly to discuss the CEP recommendations and how to proceed forward.
CEPR EOC 10 - Develop specific planning, training, and exercises focusing on long term power and water loss due to unforeseen events or scenarios.	
Status: Initiated	Update: CPS Energy partnered with the city EOC and SAWS on their efforts in planning exercises with natural disaster scenarios. CPS Energy coordinated with the CoSA San Antonio Office of Emergency Management (SAOEM), SAWS and CPS Energy, and Texas A&M Engineering Extension Service (TEEX). We began planning the training and table top exercise in August. The scenarios and exercise game plan were finalized on September 13, 2021. CoSA's table top exercise will be held on September 28, 2021. CoSA, SAWS, Bexar County and other applicable entities will be participating. CPS Energy and SAWS also partnered and conducted a table top exercise involving natural disasters hosted by Black and Veatch on July 7, 2021. This exercise highlighted the need for clear communication between SAWS and CPS and was attended by the operations management of both utilities. CPS Energy will invite the above entities and elected officials to participate in GridEx. GridEx is a distributed play grid exercise that allows participants to engage remotely, simulates a cyber and physical attack on the North American electricity grid and other critical infrastructure. The planning began in early July. GridEx tabletop will be on November 16, 2021 and November 17, 2021. The training will be held via WebEx due to COVID concerns and the number of participants attending. Once the table tops are complete, we will share the training documents built for the table tops and give participant feedback of the exercises. The natural disaster training will be completed on September 28, 2021 and the security attack on the



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	grid (GridEx) training will be complete November 17, 2021. Both types of training will be repeated yearly. Our Staff has met with CoSA, SAWS and TEEEX and finalized all training materials for the natural disaster scenario. We are ready for the table top exercise. GridEx scenarios have been completed and we are ready for the table top exercise.
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CEPR EOC 11 - Enhance city-wide cross-department and cross-discipline emergency response training.	
Status: Initiated	Update: Action Plan or Response Direction: CPS Energy works with the city EOC and SAWS to plan disaster scenarios and then participates with SAOEM (EOC) in exercises addressing those scenarios. We will work with the EOC creating plans for catastrophic incidents where a significant percentage of workers are not able to work remotely due to power outages. We will then exercise those scenarios. We have already planned and outlined the training for the remainder of this year and will add these scenarios to future training. Action Plan or Response Status: Once the table tops are complete, we will share the training documents built for the table tops and give participant feedback of the exercises. Target Completion Date: These types of training will be repeated yearly. Status: Staff meets with CoSA, SAWS, TDEM and others monthly to discuss the CEP recommendations and how to proceed forward.

CEPR EOC 12 - Create an annual emergency response table top exercise that includes elected officials, executive leadership for the City, County and Utilities.	
Status: Initiated	Update: In response to this recommendation, CPS Energy is working with the city EOC and SAWS to plan disaster scenarios and will then participate with SAOEM (EOC) in exercises addressing those scenarios. We will work with the EOC creating plans for catastrophic incidents where a significant percentage of workers are not able to work remotely due to power outages. We will then exercise those scenarios. We have already planned and outlined the training for the remainder of this year and will add these scenarios to future training. Once the table tops are complete, we will share the training documents built for the table tops and give participant feedback of the exercises. We expect the action plan associated with this recommendation to be completed by the end of November.

CEPR EOC 13 - COSA should adjust the relationship with CPS and SAWS that provides, during certain contingencies, authority for COSA to exercise effective command and control.	
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Status: In-progress	Update: Based on the CEP recommendation provided, the response we are developing will include how enhanced communication and coordination between CPS and CoSA can address the prescribed recommendation. The draft plan is under development and we expect have a finalized plan to submit by December 31, 2021.
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CEPR EOC 14 - CPS Energy's load-shedding decisions should be made in concert with emergency managers and city leaders.

Status: In-progress	Update: Based on the CEP recommendation provided, the response we are developing will include how enhanced communication and coordination between CPS and CoSA can address the prescribed recommendation. The draft plan is under development and we expect have a finalized plan to submit by December 31, 2021.
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CEPR EOC 18 - Ensure CPS and SAWS communications are coordinated through the JIC to improve situational awareness for all entities involved.

Status: Initiated	Update: This protocol will be incorporated into our updated Crisis Communications plan. Meanwhile, we are scheduled to meet with SAWS Communications on September 17, 2021. We expect to finalize and submit the action plan by October 11, 2021.
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CEPR EOC 19 - Coordinate daily media briefings by and between COSA, County officials, CPS and SAWS.

Status: Initiated	Update: This protocol will be incorporated into our updated Crisis Communications plan. We expect to finalize and submit the action plan by early November 2021.
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CEPR EOC 20 - City 311 and CPS/SAWS Customer Service Call Centers should develop protocols to enhance the customer experience for the community including extended hours.

Status: Initiated	Update: In response to this recommendation, CPS Energy will focus on three components: Hours, High Volume Management and Partnership. HOURS: CPS Energy is open 24x7 for emergency calls. In advance of storms and high potential of outages, we add messaging to our IVR system and add additional staff. During the event in February, we had all hands-on deck but more than half of our staff was impacted due to power and water issues which limited our staff that was available to support the incoming calls.
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**CEP RECOMMENDATIONS STATUS UPDATE
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	<p>HIGH VOLUME MANAGEMENT: Because of Winter Storm Uri, we received over 625,000 calls. We partner with a high-volume automated call support service to provide additional support for this high volume and to reduce the number of callers that get an error message when calling. In addition, we update the upfront message on the IVR to provide awareness of any details that we have on major outages.</p> <p>PARTNERSHIP: We are meeting with the 311 leadership on Thursday (September 16, 2021) to identify communication and partnership opportunities during emergency events and day to day operations.</p> <p>We expect to finalize and submit the action plan associated with this recommendation in Early December 2021.</p> <p>Our IT team has begun working with the 311 technical team to identify process and volumes to determine improvements to our transfer and hold experience. This will be developed over the next 3 months to determine potential enhancements or systems changes for consideration. We are working with internal teams to determine an action plan.</p>
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CEPR EOC 23 - The impact of CPS rotating outages should be clearly communicated and coordinated with COSA and SAWS to determine operational/service impacts more comprehensively.	
Status: Initiated	Update: Based on the CEP recommendation provided, the response we are developing will include how enhanced communication and coordination between CPS and CoSA can address the prescribed recommendation. We expect to complete the action plan associated with this recommendation will be complete by December 1, 2021.



**CEP RECOMMENDATIONS STATUS UPDATE
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CEPR EOC 24 - Identify a situational awareness platform that can display evolving information remotely from operational teams to leadership.	
Status: Initiated	Update: We have secured a PM to pull together a cross functional team of leaders from Generation, Transmission, Distribution and Retail (customer facing), in order to develop an enterprise-wide understanding of the various business needs that the Situational Awareness Platform must fulfill. This will allow us to develop automation, data flow, data governance, and process improvement opportunities in order to facilitate real time actionable insights and decision making during an outage situation. The team will start working towards developing a Charter for this initiative that will yield a high-level recommendation including scope, budget, timeline, and resource needs. We anticipate being completely done with the Charter over next 12-16 weeks. This duration is primarily due to bandwidth limitation of the key leaders that we need to engage over next several weeks. We are planning the kick-off of a process to collect business requirements and understand the needs of all stakeholders to evaluate which of the available situational awareness platforms will fit best with our needs. We anticipate completing the action plan associated with this recommendation in late November 2021.

Appendix:

CEP – Committee on Emergency Preparedness

Status Definitions

- **Not Started** – Business area alignment on response to recommendation not yet started.
- **Initiated** – Business area discussions started; response to recommendation to be determined
- **In-Progress** – Business area response to recommendation determined and draft response document in-progress
- **Completed** – Sr Chief and CEO approval obtained on response document to be submitted