

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**ENTERED**

January 28, 2022

Nathan Ochsner, Clerk

In re:

JUST ENERGY GROUP INC., et al.,

Debtors in a Foreign Proceeding.<sup>1</sup>

JUST ENERGY TEXAS LP, FULCRUM RETAIL  
ENERGY LLC, HUDSON ENERGY SERVICES  
LLC, and JUST ENERGY GROUP, INC.,

Plaintiffs,

v.

ELECTRIC RELIABILITY COUNCIL OF TEXAS,  
INC. and the PUBLIC UTILITY COMMISSION OF  
TEXAS, INC.,

Defendants.

Chapter 15

Case No. 21-30823 (MI)

Adv. Pro. 21-04399 (MI)

**STIPULATION AND CONSENT ORDER REGARDING CUSTODIANS AND  
SEARCH TERMS RELATING TO FIRST AMENDED REQUESTS**

**WHEREAS**, Plaintiffs in the above-reference proceeding propounded the First Amended Request Of Just Energy LP, Fulcrum Retail Energy LLC, Hudson Energy Services LLC, and Just Energy Group, Inc. For Production Of Documents And Deposition Testimony From Electric Reliability Council Of Texas, Inc. [ECF No. 41] (“**First Amended ERCOT Request**”);<sup>2</sup> and

**WHEREAS**, Plaintiffs in the above-reference proceeding propounded the First Amended Request Of Just Energy LP, Fulcrum Retail Energy LLC, Hudson Energy Services LLC, and Just Energy Group, Inc. For Production Of Documents And

<sup>1</sup> The identifying four digits of Just Energy Group Inc.’s local Canada tax identification number are 0469. A complete list of debtor entities in these chapter 15 cases may be obtained at [www.omniagentsolutions.com/justenergy](http://www.omniagentsolutions.com/justenergy).

<sup>2</sup> Capitalized terms not defined herein have the meanings ascribed to them in the ERCOT Request.

Depositions from the Public Utility Commission of Texas [ECF No. 40] (the “**First Amended PUCT Request**,” with the ERCOT Request, the “**First Amended Requests**”); and

**WHEREAS**, ERCOT and the PUCT objected to the First Amended ERCOT Request and the First Amended PUCT Request, respectively (collectively, the “**Objections**”); and

**WHEREAS**, following a hearing held on January 14, 2022, the Court sustained the Objections in part and denied them in part, ordering that “[r]egarding phase 1 discovery [(“**Phase 1 Discovery**”)], the Court orders that items 1-6 [of the Requests] must be produced, they do not need to be reproduced if they have already been produced to Just Energy Texas, LP. The Court orders that the parties are to confer on search terms, if there is a dispute over search terms the parties can bring that dispute to the Court.” [ECF No. 49]; and

**WHEREAS**, following a hearing held on January 24, 2022, the Court ordered further that “that the PUC Staff is to speak to Counsel Jason Binford and provide him with adequate information to participate at the continued hearing. Discovery conference continued to 1/27/22 at 1:30 pm. As stated on the record, the hearing will be canceled if the Court receives a 3-party stipulation on discovery. If no stipulation is filed by the parties, the hearing will be called.” [ECF No. 68]

**NOW, THEREFORE, THE PARTIES HEREBY STIPULATE:**

- (1) ERCOT’s custodians for the purposes of responding to the First Amended ERCOT Requests (as modified by the Court in response to the Objections) will be Bill Magness, Chad Seely, Dan Woodfin, Dave Maggio, Kenan Ogelman, and Nathan Bigbee (the “**ERCOT Custodians**”).

- (2) ERCOT represents that the search terms in the Brazos production on Jamil Alibhai's email to Kate Shih dated January 20, 2022 at 9:22 p.m. (see Attachment A hereto) already have been applied to the electronic information, including emails and text messages, of the ERCOT Custodians during the February 10, 2021 to February 16, 2021 time period (the "**Time Period**") and that the non-privileged documents responsive to the e searches highlighted on Attachment A will be designated "Highly Confidential Material" under an agreed upon confidentiality order and produced to Plaintiffs.
- (3) ERCOT represents that Plaintiffs' additional proposed search terms--((a) PUCT /3 order\*; (b) HCAP; and (c) generat\* w/3 outage\*) have been captured through the application of similar search terms included in Attachment A.
- (4) ERCOT agrees that to the extent documents produced in accordance with the foregoing parameters may not fully capture the documents requested by Plaintiffs in the First Amended ERCOT Request (as modified by the Court in response to the Objections) for purposes of Phase 1 Discovery, then the parties will confer in good faith to discuss supplemental document collections, including through use of additional search terms.
- (5) The PUCT's custodians for purposes of responding to the First Amended PUCT Requests (as modified by the Court in response to the Objections) will be Thomas Gleeson, Stephen Journeay, Shelly Botkin, Arthur D'Andrea, and DeAnn Walker (the "**PUCT Custodians**").
- (6) The PUCT represents that the search terms listed on Attachment B hereto already have been applied to the electronic information, including emails and

text messages, of the PUCT Custodians during the Time Period, and that the non-privileged documents responsive to those searches have been produced to Plaintiffs. The PUCT also represents that the non-privileged documents responsive to the public information requests in Attachment C hereto relating to the PUCT Custodians have been produced to Plaintiffs.

- (7) The PUCT agrees to apply the following additional searches to the electronic information, including emails and text messages, of the PUCT Custodians during the Time Period: (a) HCAP; (b) firm /5 shed! OR “firm load shed”; and (c) generat\* /3 outage\*.
- (8) The parties reserve all rights, including the right to seek (i) supplemental document discovery during Phase 1 Discovery, including with respect to any 30(b)(6) designee; or (ii) additional document discovery in subsequent phases of this litigation.

Signed: January 28, 2022

A handwritten signature in black ink, appearing to read 'M Isgur', is written above a horizontal line.

Marvin Isgur  
United States Bankruptcy Judge

Stipulation Agreed to by:

**QUINN, EMANUEL, URQUHART,  
& SULLIVAN LLP**

**OFFICE OF THE ATTORNEY  
GENERAL OF TEXAS**

By: /s/ James C. Tecce

James C. Tecce  
Lindsay M. Weber  
Christine J. Chen  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

By: /s/ Ken Paxton

Ken Paxton  
Attorney General of Texas

Brent Webster  
First Assistant Attorney General

Grant Dorfman  
Deputy First Assistant Attorney General

By: /s/ Kate Kaufmann Shih

Kate Kaufmann Shih  
John Bash  
Pennzoil Place  
711 Louisiana St., Suite 500  
Houston, TX 77002  
Telephone: (713) 221-7000  
Facsimile: (713) 221-7100

Shawn E. Cowles  
Deputy Attorney General for Civil  
Litigation

Sean O'Neill  
Assistant Attorney General  
Deputy Chief, Bankruptcy & Collections  
Division

*Counsel to Just Energy*

**MUNSCH HARDT KOPF & HARR,  
P.C.**

By: /s/ Kevin M. Lippman

Kevin M. Lippman  
Texas Bar No. 00784479  
klippman@munsch.com  
Deborah Perry  
Texas Bar No. 24002755  
dperry@munsch.com  
John Cornwell  
Texas Bar No. 24050450  
jcornwell@munsch.com  
Jamil N. Alibhai  
Texas Bar No. 00793248  
jalibhai@munsch.com  
Ross H. Parker  
Texas Bar No. 24007804  
rparker@munsch.com  
3800 Ross Tower  
500 N. Akard Street  
Dallas, Texas 75201-6659  
Telephone: (214) 855-7500  
Facsimile: (214) 855-7584

Jason B. Binford  
Texas State Bar No. 24045499  
S. Dist. Bar No. 574720  
Layla D. Milligan  
Texas State Bar No. 24026015  
S. Dist. Bar No. 38000  
Autumn D. Highsmith  
Texas State Bar No. 24048806  
S. Dist. Bar No. 597383  
Office of the Attorney General of Texas  
Bankruptcy & Collections Division  
P. O. Box 12548 MC008  
Austin, Texas 78711-2548  
Telephone: (512) 463-2173  
Facsimile: (512) 936-1409  
jason.binford@oag.texas.gov  
layla.milligan@oag.texas.gov  
autumn.highsmith@oag.texas.gov

*Counsel to the Public Utility Commission  
of Texas*

**WINSTEAD PC**

Elliot Clark

Texas Bar No. 24012428

eclark@winstead.com

Ron H. Moss (pro hac vice motion to be  
filed)

Texas Bar No. 14591025

rhmosse@winstead.com

401 Congress Avenue, Suite 2100

Austin, Texas 78701

Telephone: (512) 370-2800

Facsimile: (512) 370-2850

*Counsel to Defendant Electric Reliability  
Council of Texas, Inc.*

**James Tecce**

---

**From:** Kate Shih  
**Sent:** Sunday, January 23, 2022 12:04 PM  
**To:** Alibhai, Jamil N.; Lippman, Kevin  
**Cc:** James Tecce; John Bash; Lindsay Weber; Parker, Ross; Clark, Elliot (eclark@winstead.com); Christine J Chen; Simon Barnas  
**Subject:** RE: Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

Jamil, I've highlighted below in yellow the search terms and custodians (Bill Magness, Chad Seely, Dave Maggio, Kenan Ogelman, Nathan Bigbee, and Dan Woodfin) from the Brazos matter that we would ask ERCOT to search in the Just Energy matter.

A few notes/questions:

- We request that ERCOT search the following additional terms. If you believe these are not relevant, or subsumed by existing searches, can we please confer:
  - PUCT /3 order\*
  - HCAP
  - generat\* w/3 outage\*
  - \$9,000 or 9000 or 9K or "nine thousand"
- If you decide to designate a 30(b)(6) witness who is not among the above-requested custodians, please add that individual as a custodian.
- Please confirm that the data to be searched includes text messages as well as emails.
- Please provide with your production a log of responsive documents that are being withheld on grounds of privilege or for any other reason.
- We are proceeding based on your representation that the ERCOT board had minimal involvement with the Orders, but reserve the right to request additional discovery to the extent the board's involvement ultimately appears to be more substantial.

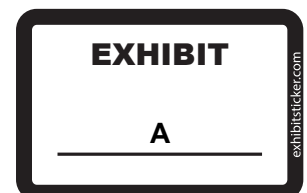
Jamie is available to speak Monday, except from 10-11:30am CT, if you would like to confer before the hearing.

Kate

**Kate Shih**  
*Partner,*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

711 Louisiana Street, Suite 500  
Houston, TX 77002  
713-221-7011 Direct  
713.221.7000 Main Office Number  
713-221-7100 FAX  
[kateshah@quinnemanuel.com](mailto:kateshah@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.



**From:** Alibhai, Jamil N. <jalibhai@munsch.com>

**Sent:** Thursday, January 20, 2022 8:22 PM

**To:** Kate Shih <kateshah@quinnemanuel.com>; Lippman, Kevin <KLippman@Munsch.com>

**Cc:** James Tecce <jamestecce@quinnemanuel.com>; John Bash <johnbash@quinnemanuel.com>; Lindsay Weber <lindsayweber@quinnemanuel.com>; Parker, Ross <RParker@Munsch.com>; Clark, Elliot (eclark@winstead.com) <eclark@winstead.com>; Christine J Chen <christinejchen@quinnemanuel.com>; Simon Barnas <simonbarnas@quinnemanuel.com>

**Subject:** RE: Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

[EXTERNAL EMAIL from [jalibhai@munsch.com](mailto:jalibhai@munsch.com)]

Kate, in preparation for our call, I want to share the custodians and search terms that we used in the Brazos case. My recommendation is that you choose the custodians and search terms that relate to your requests for production as permitted by Judge Isgur. We can then cull those documents and produce the responsive documents more quickly.

**Debtor's search terms:**

Pric\* AND (ancillary OR real OR scarc\* OR market OR clear\* OR mechanism OR ahead OR DAM OR RTM OR power  
OR energy OR gas OR ng OR generat\* OR capacity\* OR deviat\* OR protocol OR signal OR emerg\* OR EEA)  
"reliability unit commitment"  
RUC\* OR [any other acronym ERCOT uses for the reliability unit commitment]  
Protocol /50 (pric\* OR chang\* OR deviat\* OR alter OR shift OR compl\* OR amend OR modify OR revis\* OR adjust\*  
OR reform\* OR design\* OR var\* OR tweak OR susp\* OR broke\* OR break\* OR violat\* OR accord\* OR controv\*)  
Load /3 shed\*  
9,000  
Offer /3 cap  
(repric\* OR re-pric\* OR "re pric\*") AND (market OR Uri OR storm OR February OR charg\* OR difficult\* OR abl\* OR availab\*)  
Uplift AND (weather OR Uri OR storm OR February OR charg\*)  
(roll\* OR rot\*) /5 (out\* OR black\* or power)  
Brazos AND (contract OR agreement OR "market participant agreement" OR MPA OR SFA OR "standard form  
agreement" OR [any other acronym or abbreviation ERCOT uses to refer to these contracts])  
"force majeure"  
(invoice OR bill OR settle\* OR charge OR collect\*) AND "brazos"  
(cyber\* OR hack OR glitch) AND (pric\* or repric\* or re-pric\* or overcharg\*)  
To/from/cc/bcc email domain: @potomaceconomics.com  
"generation capacity" OR [any acronyms ERCOT uses to describe generation capacity]  
(out\* OR trip\* OR fail OR off\*) /15 (weather OR storm)  
(gas /s (availab\* OR suppl\* OR firm OR non-firm)) AND date = 2/1/2021 through 2/14/2021  
(gas /s deliver\*) AND date = 2/15/2021 through 2/20/2021  
"51617" OR [any other number or phrase ERCOT uses to refer to Project No. 51617]  
"M-C021521"



to/from/cc/bcc: email domain: @puc.texas.gov  
to/from/cc/bcc: [PUCandBoardofDirectors@ercot.com](mailto:PUCandBoardofDirectors@ercot.com)  
to/from/cc/bcc: [1ercotexecutiveteam@ercot.com](mailto:1ercotexecutiveteam@ercot.com)  
to/from/cc/bcc: [sallytalberg@gmail.com](mailto:sallytalberg@gmail.com)  
to/from/cc/bcc: [pcramton@gmail.com](mailto:pcramton@gmail.com)  
to/from/cc/bcc: [terry.bulger@outlook.com](mailto:terry.bulger@outlook.com)  
to/from/cc/bcc: [raymond.hepper@gmail.com](mailto:raymond.hepper@gmail.com)  
to/from/cc/bcc: [rmiller@southernfederal.com](mailto:rmiller@southernfederal.com)  
to/from/cc/bcc: [vanesetti@justenergy.com](mailto:vanesetti@justenergy.com)

Real-Time On-Line Reliability Deployment Price Adder OR "RTOLRDPA" OR RDPA OR RTBLTIMPORT OR "Generation

to be dispatched" OR [ERCOT to supply any other acronyms used here]

Protocol\* /5 9.19\*

Protocol\* /5 6.5.9\*

Protocol\* /5 5.5\*

**UCC's search terms:**

"0037722901000"

"0037722901100"

"0037722902000"

"0037722902100"

"0037722903000"

"0037722903300"

"0037722904000"

"0037722905000"

"0037722905100"

"9617940263000"

"129468067"

"004770496398"

"Project No. 51617" & pric\*

"Project No. 51812"

@brazoselectric.com

Brazos

"Brazos Electric"

"payment plan" & Brazos

"collateral" & Brazos

"uplift" & Brazos

(shadow /1 settle\*) & Brazos - 3 -

"credit monitoring" & Brazos

"critical infrastructure" & Brazos

(load /1 shed\*) & Brazos

Derate\* & Brazos

Karnei

Khaki

Bordovsky

Clevenger

Thrall

Johnny /3 York

“M-A031821\*”

“M-C021521\*”

EEA & “\$9,000\*”

EEA w/20 pric\*

EEA w/20 (repric\* or re-pric\*)

Emergency & “\$9,000\*”

Emergency w/25 pric\*

Emergency w/25 (repric\* or re-pric\*)

“Extreme Weather Event” & (settlement\* or pric\* or overcharg\*)

glitch & (pric\* or repric\* or re-pric\* or overcharg\*)

TAC & (pric\* or repric\* or re-pric\* or overcharg\*)

“Technical Advisory Committee” & (pric\* or repric\* or re-pric\* or overcharg\*)

“Independent Market Monitor” & (pric\* or repric\* or re-pric\* or overcharg\*)

“IMM” & (pric\* or repric\* or re-pric\* or overcharg\*)

Potomac & (pric\* or repric\* or re-pric\* or overcharg\*) - 4 -

@ferc.gov & (pric\* or repric\* or re-pric\*)

“FERC” & (pric\* or repric\* or re-pric\*)

@nerc.com & (pric\* or repric\* or re-pric\*)

“NERC” & (pric\* or repric\* or re-pric\*)

Suspen\* w/25 protocol\*

deviat\* w/25 protocol\*

“Force majeure”

“System-Wide Offer Cap” w/25 (adjust\* or continu\*)

SWOC w/25 (adjust\* or continu\*)

SWCAP w/25 (adjust\* or continu\*)

LCAP w/25 (adjust\* or suspen\*)

Senate /25 (testif\* or testim\* or investig\* or hearing\*)

House /25 (testif\* or testim\* or investig\* or hearing\*)

“Sandy Creek”

“Mid-South Electric”

“Wise Electric”

“Denton County Electric” or CoServ

“United Electric” or UCS

“Comanche County Electric”

“Hamilton County Electric”

“J-A-C Electric”

“South Plains Electric”

“Heart of Texas Electric”

“Cooke County Electric” or “PenTex”

“Navarro County Electric” - 5 -

“Bartlett Electric”

“Fort Belknap Electric”

“HILCO Electric”

“Navasota Valley Electric”

“Tri-County Electric”

“Temporary Affordability”

“Jack County” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Randle Miller” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Randle W. Miller” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Johnson County” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Sandy Creek” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

Resign\* & board & (winter\* or storm or Uri or weather\*)

Resign\* & commission\* & (winter\* or storm or Uri or weather\*)

1. Betty Day
2. Bill Magness
3. Chad Seely
4. Chad Thompson
5. Dan Woodfin
6. Darrell Jenkins
7. Dave Maggio
8. Ino Gonzalez
9. Jeyant Tamby
10. Jimmy Hartmann
11. Julio Dovalina
12. Kenan Ögelman
13. Leslie Sopko
14. Leslie Wiley
15. Lindsey Hughes
16. Mark Ruane
17. Maruthi Gaddam
18. Mohammad Khan
19. Nathan Bigbee
20. Ohlen Dinopol
21. Rizaldy Zapanta
22. Sandip Sharma
23. Sean Taylor
24. Shalesh Ganjoo
25. Spoorthy Papudesi
26. Ted Hailu
27. Theresa Gage
28. Vanessa Spells
29. Venkat Tirupati
30. Warren Lasher
31. Woody Rickerson
32. Kristi Hobbs
33. Jaypal Parakuth
34. Richard Scheel
35. Rob Orr
36. Vickie Leaday

Jamil

**Jamil N. Alibhai**

Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 3800 / Dallas, Texas 75201-6659

Direct: +1.214.880.1061 / [jalibhai@munsch.com](mailto:jalibhai@munsch.com) / [munsch.com](http://munsch.com)

---

**From:** Kate Shih <[kateshah@quinnemanuel.com](mailto:kateshah@quinnemanuel.com)>  
**Sent:** Thursday, January 20, 2022 1:17 AM  
**To:** Alibhai, Jamil N. <[jalibhai@munsch.com](mailto:jalibhai@munsch.com)>; Lippman, Kevin <[KLippman@Munsch.com](mailto:KLippman@Munsch.com)>  
**Cc:** James Tecce <[jamestecce@quinnemanuel.com](mailto:jamestecce@quinnemanuel.com)>; John Bash <[johnbash@quinnemanuel.com](mailto:johnbash@quinnemanuel.com)>; Lindsay Weber <[lindsayweber@quinnemanuel.com](mailto:lindsayweber@quinnemanuel.com)>; Parker, Ross <[RParker@Munsch.com](mailto:RParker@Munsch.com)>; Clark, Elliot ([eclark@winstead.com](mailto:eclark@winstead.com)) <[eclark@winstead.com](mailto:eclark@winstead.com)>; Christine J Chen <[christinejchen@quinnemanuel.com](mailto:christinejchen@quinnemanuel.com)>; Simon Barnas <[simonbarnas@quinnemanuel.com](mailto:simonbarnas@quinnemanuel.com)>  
**Subject:** RE: Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

Thanks, Jamil, that works for us if it works for your colleagues. I just sent around an invite to hold the time.

**Kate Shih**  
*Partner,*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

711 Louisiana Street, Suite 500  
Houston, TX 77002  
713-221-7011 Direct  
713.221.7000 Main Office Number  
713-221-7100 FAX  
[kateshah@quinnemanuel.com](mailto:kateshah@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

---

**From:** Alibhai, Jamil N. <[jalibhai@munsch.com](mailto:jalibhai@munsch.com)>  
**Sent:** Wednesday, January 19, 2022 6:09 PM  
**To:** Kate Shih <[kateshah@quinnemanuel.com](mailto:kateshah@quinnemanuel.com)>; Lippman, Kevin <[KLippman@Munsch.com](mailto:KLippman@Munsch.com)>  
**Cc:** James Tecce <[jamestecce@quinnemanuel.com](mailto:jamestecce@quinnemanuel.com)>; John Bash <[johnbash@quinnemanuel.com](mailto:johnbash@quinnemanuel.com)>; Lindsay Weber <[lindsayweber@quinnemanuel.com](mailto:lindsayweber@quinnemanuel.com)>; Parker, Ross <[RParker@Munsch.com](mailto:RParker@Munsch.com)>; Clark, Elliot ([eclark@winstead.com](mailto:eclark@winstead.com)) <[eclark@winstead.com](mailto:eclark@winstead.com)>; Christine J Chen <[christinejchen@quinnemanuel.com](mailto:christinejchen@quinnemanuel.com)>; Simon Barnas <[simonbarnas@quinnemanuel.com](mailto:simonbarnas@quinnemanuel.com)>  
**Subject:** RE: Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

[EXTERNAL EMAIL from [jalibhai@munsch.com](mailto:jalibhai@munsch.com)]

---

Kate, how about Friday morning at 9 (if that works for my colleagues)?

Jamil

**Jamil N. Alibhai**

Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 3800 / Dallas, Texas 75201-6659

Direct: +1.214.880.1061 / [jalibhai@munsch.com](mailto:jalibhai@munsch.com) / [munsch.com](http://munsch.com)

Notice: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. Nothing contained in this message or in any attachment shall constitute a contract or electronic signature under the Electronic Signatures in Global and National Commerce Act, any version of the Uniform Electronic Transactions Act or any other statute governing electronic transactions.

---

**From:** Kate Shih <[kateshieh@quinnemanuel.com](mailto:kateshieh@quinnemanuel.com)>  
**Sent:** Wednesday, January 19, 2022 6:07 PM  
**To:** Lippman, Kevin <[KLippman@Munsch.com](mailto:KLippman@Munsch.com)>; Alibhai, Jamil N. <[jalibhai@munsch.com](mailto:jalibhai@munsch.com)>  
**Cc:** James Tecce <[jamestecce@quinnemanuel.com](mailto:jamestecce@quinnemanuel.com)>; John Bash <[johnbash@quinnemanuel.com](mailto:johnbash@quinnemanuel.com)>; Lindsay Weber <[lindsayweber@quinnemanuel.com](mailto:lindsayweber@quinnemanuel.com)>; Christine J Chen <[christinejchen@quinnemanuel.com](mailto:christinejchen@quinnemanuel.com)>; Simon Barnas <[simonbarnas@quinnemanuel.com](mailto:simonbarnas@quinnemanuel.com)>  
**Subject:** RE: Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

Kevin and Jamil, following up to see if we could please confer about these this week. I'm available tomorrow after 12:30pm, or Friday before 11am or after 3pm. Please let me know.

**Kate Shih**  
*Partner,*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

711 Louisiana Street, Suite 500  
Houston, TX 77002  
713-221-7011 Direct  
713.221.7000 Main Office Number  
713-221-7100 FAX  
[kateshieh@quinnemanuel.com](mailto:kateshieh@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

---

**From:** Kate Shih  
**Sent:** Tuesday, January 18, 2022 5:32 PM  
**To:** [KLippman@Munsch.com](mailto:KLippman@Munsch.com); [jalibhai@munsch.com](mailto:jalibhai@munsch.com)  
**Cc:** James Tecce <[jamestecce@quinnemanuel.com](mailto:jamestecce@quinnemanuel.com)>; John Bash <[johnbash@quinnemanuel.com](mailto:johnbash@quinnemanuel.com)>; Lindsay Weber <[lindsayweber@quinnemanuel.com](mailto:lindsayweber@quinnemanuel.com)>; Christine J Chen <[christinejchen@quinnemanuel.com](mailto:christinejchen@quinnemanuel.com)>; Simon Barnas <[simonbarnas@quinnemanuel.com](mailto:simonbarnas@quinnemanuel.com)>  
**Subject:** Just Energy v. ERCOT, No. 21-4399 - ERCOT discovery

Kevin and Jamil: Attached is a list of ERCOT custodians that JustEnergy would request that ERCOT search, along with proposed search terms to be applied. These are still under client review, but wanted to provide to you to start the discussion. We're available this week to discuss.

**Kate Shih**  
*Partner,*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

711 Louisiana Street, Suite 500  
Houston, TX 77002  
713-221-7011 Direct  
713.221.7000 Main Office Number  
713-221-7100 FAX

[kateshah@quinnemanuel.com](mailto:kateshah@quinnemanuel.com)  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

**Custodians, Date Range, and Search Terms — PUCT**

*In re Brazos Electric Power Cooperative, Inc.*, Case No. 21-30725 (DRJ) (Bankr. S.D. Tex.)

**Custodians**

Harika Basaran  
Mariah Benson  
Thomas Gleeson  
Werner Roth  
Connie Corona  
Rebecca Zerwas  
Stephen Journeyay  
Barksdale English  
Thomas Hunter  
Charles Bondurant  
Shelly Botkin  
Arthur D’Andrea  
DeAnn Walker  
Paytyn Woltersdorf  
Adrienne Brandt  
Davida Dwyer  
Darryl Tietjen

**Date Range**

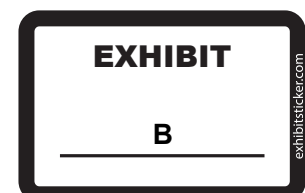
February 1, 2021 – March 31, 2021

**Search Terms**

“003772290\*”

“9617940263000”

“129468067”



“004770496398”

“Project No. 51617” & pric\*

“Project No. 51812”

@brazoselectric.com

Brazos

“Brazos Electric”

“payment plan” & Brazos

“collateral” & Brazos

“uplift” & Brazos

(shadow /1 settle\*) & Brazos

“credit monitoring” & Brazos

(load /1 shed\*) & Brazos

Karnei

Khaki or Bordovsky

Clevenger

Thrall

Johnny /3 York

“M-A031821\*”

“M-C021521\*”

EEA & “\$9,000\*”

EEA w/20 pric\*

EEA w/20 (repic\* or re-pric\*)

Emergency & “\$9,000\*”



Emergency w/25 pric\*

Emergency w/25 (repic\* or re-pric\*)

“Extreme Weather Event” & (settlement\* or pric\* or overcharg\*)

glitch & (pric\* or repic\* or re-pric\* or overcharg\*)

TAC & (pric\* or repic\* or re-pric\* or overcharg\*)

“Technical Advisory Committee” & (pric\* or repic\* or re-pric\* or overcharg\*)

“Independent Market Monitor” & (pric\* or repic\* or re-pric\* or overcharg\*)

“IMM” & (pric\* or repic\* or re-pric\* or overcharg\*)

Potomac & (pric\* or repic\* or re-pric\* or overcharg\*)

@ferc.gov & (pric\* or repic\* or re-pric\*)

“FERC” & (pric\* or repic\* or re-pric\*)

@nerc.com & (pric\* or repic\* or re-pric\*)

“NERC” & (pric\* or repic\* or re-pric\*)

Suspen\* w/25 protocol\*

deviat\* w/25 protocol\*

“Force majeure”

“System-Wide Offer Cap” w/25 (adjust\* or continu\*)

SWOC w/25 (adjust\* or continu\*)

SWCAP w/25 (adjust\* or continu\*)

LCAP w/25 (adjust\* or suspen\*)

Senate /25 (testif\* or testim\* or investig\* or hearing\*) & Uri

House /25 (testif\* or testim\* or investig\* or hearing\*) & Uri

“Sandy Creek”

“Mid-South Electric”

“Wise Electric”

“Denton County Electric” or CoServ

“United Electric” or UCS

“Comanche County Electric”

“Hamilton County Electric”

“J-A-C Electric”

“South Plains Electric”

“Heart of Texas Electric”

“Cooke County Electric” or “PenTex”

“Navarro County Electric”

“Bartlett Electric”

“Fort Belknap Electric”

“HILCO Electric”

“Navasota Valley Electric”

“Tri-County Electric”

“Temporary Affordability”

“Jack County” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Randle Miller” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Randle W. Miller” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Johnson County” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

“Sandy Creek” w/10 (plant or generat\* or shed\* or curtail\* or critical or shortag\*)

Resign\* & board & (winter\* or storm or Uri or weather\*)

Resign\* & commission\* & (winter\* or storm or Uri or weather\*)

(Firm w/5 shed!) and (price w/10 (signal! or trigger!))

(Demand w/10 reduc!) And (price! w/5 (signal! or trigger!))

(Deploy! or controllable) w/5 resource!

RUC-committed w/5 resource!

Deploy! w/5 emergency response

(Price w/5 add!) w/10 (signal! or trigger!)

(Reliab! w/10 price) w/5 (signal! or trigger!)

Protocol! w/10 (load or shed!)

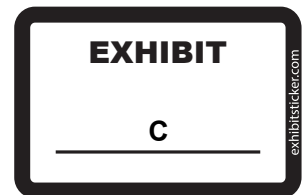
Emergency w/10 (signal! or trigger!)

(Firm w/5 shed!) w/10 "6.5.7.3.1"

"firm load shed" & ("Price Adder" or "6.5.7.3.1")

Public Information Requests - PUCT

PIADateRecd	PIAReqName	PIAReqCompany	PIADesc
2/17/21	Trahan, Jason	WFAA-TV - Dallas, TX	For the period from Feb. 8, 2021, to Feb. 16, 2021: + Emails and text messages (including on personal devices or personal messaging platforms if they pertain to state business) of DeAnn Walker, Arthur D'Andrea and Shelly Botkin sent to, or received by, ERCOT's Dan Woodfin, Bill Magness or Sally Talberg.
2/17/21	Rawls, James		All records pertaining to the permission received by ERCOT and other utility providers for the emergency rate increase. Specifically I would like any records of hearings and voting by the commissioners to approve the rate hike. I would also like any details issued by other agency management to approve the rate hike if it was done without approval by the commissioners.
2/17/21	Dent, Mark	Fort Worth Star-Telegram	Copies of all reports submitted to the PUC concerning weather winterization from the years 2012, 2013, 2020 and 2021
2/17/21	Wade, Will	Bloomberg News	Copies of all communication between the PUC and Electric Reliability Council of Texas regarding the maintenance and management of the flow of electricity during the winter storm of February 2021
2/17/21	Dexheimer, Eric	Houston Chronicle	Annual power generation weatherization/Weather Emergency Preparedness Reports received from power generation companies, municipally owned utilities, and electric cooperatives for 2019 and 2020, as described in Texas Utilities Code Section 186.007.
2/18/21	Larson, Ren	The Texas Tribune	A machine-readable GIS file (preferably a shapefile/.shp) of the boundaries of the electric grid in ERCOT's service area, and other reliability corporations in Texas. The shapefile   identified online at DHS open data portal does not align with ERCOT's own map.
2/18/21	McGaughy, Lauren	The Dallas Morning News	A list of any and all enforcement investigations initiated and/or enforcement actions taken, including settlements, between 2018 and today.
2/18/21	Kasper, Matt	Energy and Policy Institute	Copies of the following individuals email communication, including attachments, sent and received between February 11, 2021 through February 17, 2021: • Chairman DeAnn T. Walker • DeAnn Walker's Commission Advisor • DeAnn Walker's Executive Assistant • Michael Hoke, Director of Governmental Affairs • Thomas Gleeson, Executive Director • Andrew Barlow, Director Of External Affairs The search for records can be limited to search for the following keywords in emails (sent/received) and attachments: • "Gas" • "Wind" • "Coal" • "Nuclear" • "Thermal" • "ERCOT" • "@gov.texas.gov"



Public Information Requests - PUCT

2/18/21	Sechler, Bob	Austin American Statesman	<p>1) The names and addresses of all energy generators and/or distributors that went offline or interrupted operations on the ERCOT grid anytime from Wednesday, Feb. 10, 2021, to Thursday, Feb. 18, 2021. I also am requesting the names of the owners of the generators or distributors, the times they reported going offline or interrupting operations, the times (if any) that they came back online or renewed operations, and the stated reasons for the interruptions of operations. 2) Copies of every advisory to the Public Utility Commission of Texas from the Electric Reliability Council of Texas anytime from Monday, Feb. 8, 2021, to Thursday, Feb. 18, 2021, regarding the state of the ERCOT grid and the measures being taken or contemplated to safeguard it. 3) Copies of every directive from the Public Utility Commission of Texas or the Electric Reliability Council of Texas to Austin Energy, Pedernales Electric Cooperative, Bluebonnet Electric Cooperative and the Lower Colorado River Authority to shed load, or to increase power generation, anytime from Wednesday, Feb. 10, 2021, to Thursday, Feb. 18, 2021. 4) Copies of every advisory from the Public Utility Commission of Texas to the office of the Texas governor or the office of the Texas lieutenant governor anytime from Monday, Feb. 8, 2021, to Thursday, Feb. 18, 2021, regarding the state of the ERCOT power grid and the measures being taken or contemplated to safeguard it.</p>
2/18/21	Highfield, Kyle		<p>Records of the schedules and plans for the rolling blackouts in ZIP code 76148 for the week of February 14th, 2021, in as much granularity as possible, including the date when said plans were finalized. Emailed PDFs to this email address are sufficient.</p>
2/18/21	Peterson, Hanslin		<p>Records and information related to the rolling blackouts of Monday, February 12, 2021 to Thursday, February 18, 2021. I was recently without power from Monday, February 15, 2021 to Thursday, February 18, 2021. I was informed by Oncor and my retail electric provider that we were in an area of "rolling" blackouts. Some houses on my block never lost power, and most houses lost power for several days. I am not upset at my neighbors that had power, and they did not have private generators or batteries. However, I am very disappointed that I and many of my neighbors did not receive notice to expect three days without power, especially when the official communications from ERCOT and Oncor were to expect rolling blackouts. Please, please...please fix your communications to customers to expect days without power.</p>

Public Information Requests - PUCT

2/18/21	Churchill, Lexi	ProPublica and the Texas Tribune	<p>4 separate requests included as pdfs. Request 1: Any and all communication to/from the following Public Utility Commission leaders and employees including but not limited to texts, emails, voicemails, online messages (such as Slack, Teams, Facebook messenger, Whats app, Signal etc.), call logs, meeting recordings, meeting memos, internal reports and guidance from Feb. 1, 2021 to Feb. 12, 2021. This should include communications from professional and personal phones, computers and email addresses. I ask that you pull this information from the following people: • Commissioners DeAnn Walker, Arthur D'Andrea, and Shelly Botkin • Executive Director Thomas Gleeson • Director of External Affairs Andrew Barlow • Director of Government Relations Mike Vacant • Director of Oversight and Enforcement Mick Long • Director of Infrastructure and reliability Mick Keith Rogas • Director of Rate Regulation Darryl Tietjen • Director of Water Utility regulation Tammy Benter Request #2: Any and all communication to/from the following Public Utility Commission leaders and employees including but not limited to texts, emails, voicemails, online messages (such as Slack, Teams, Facebook messenger, Whats app, Signal etc.), call logs, meeting recordings, meeting memos, internal reports and guidance from Feb. 13, 2021 to the day this request is filled. This should include communications from professional and personal phones, computers and email addresses. I ask that you pull this information from the following people: • Commissioners DeAnn Walker, Arthur D'Andrea, and Shelly Botkin • Executive Director Thomas Gleeson • Director of External Affairs Andrew Barlow • Director of Government Relations Mike Vacant • Director of Rate Regulation Darryl Tietjen • Director of Infrastructure and Enforcement Mick Long • Director of Water Utility regulation Tammy Benter Request #3: All weatherization plans submitted to the Public Utility Commission since January 1, 2011. This should include but is not limited to all Public Utility Commission responses, documentation of follow up visits, assessments, compliance reports and actions taken. Request #4: Any and all records that detail power sources that failed to work and/or had difficulty operating at full capacity from February 1, 2021 through the day this request is filled. I ask that you include the entity name, owner, unit time, date and length of failure (trip time), as well as the cause(s) as to why they</p>
2/18/21	Tedesco, John	Houston Chronicle	<p>• Any emails, memos, reports or other types of documents sent between employees and officials of the Public Utility Commission and the Electric Reliability Council of Texas. Please provide all documents related to weather conditions, power grid problems and/or power outages. The time frame for this request is from Feb. 7 to the present. • Any internal emails sent by agency staff or officials that discuss ERCOT, power grid problems and/or power outages from Feb. 7 to the present.</p>
2/18/21	Tedesco, John	Houston Chronicle	<p>• Any reports related to the state's electrical system capabilities in cold weather from Jan. 1, 2011 to the present.</p>
2/18/21	Macias, Tina	KHOU 11	<p>• Any and all records listing the units, plants and/or power generation companies that experienced outages and/or forced outages at power generation companies from Feb. 14-Feb. 18. • The most recent winter weather emergency preparedness plans submitted by electric utilities and reviewed by the commission, as outlined in Sec. 186.007 of the Texas Utilities Code.</p>

Public Information Requests - PUCT

2/18/21	Churchill, Lexi	ProPublica and Texas Tribune	Documentation of all Chronic Condition and Critical Care Residential Customers (including but not limited to each customer's name, address, duration of outage and reason for outage) who have not had power at any point between February 13, 2021 to the day this request is processed.
2/19/21	Hurst, Rhonda		<p>1. What is the annual salary for every members (as of 2/9/2021) on the ERCOT and PUC boards? Please provide a detailed list of every member and their associated pay on the ERCOT and PUC boards from 1/2016 to 2/9/2021. 2. Please provide all meeting agendas, meeting minutes for all meetings where any person on the ERCOT and PUC boards from 2016 to 2/9/2021 was interviewed, discussed and approved for the board position. The information shall include the individuals complete resume and their unique qualifications for the ERCOT board. 3. Please provide a comprehensive list of all individuals that were recommended for the ERCOT and PUC boards but were not approved to the ERCOT and PUC boards from 2009 to 2/9/2021. 4. Please provide a comprehensive list of every individual that has recommended a person to serve on any ERCOT and PUC board, group or committee from 2016 to 2/9/2021. The list shall include their relationship with ERCOT and the PUC, employer, and title of the on the person that made the recommendation and the person that was recommended. 5. Please provide a comprehensive explanation as to what special talent, expertise that each non-Texan on the ERCOT board, committee and/or group member has to prevent a Texas for filling that position from 2009 to 2/9/2021. Including any and all attempts to look for and recruit Texas talent. 6. What is the annual salary that ERCOT and PUC boards, committee or group members are paid? Please provide a list of every member and their associated pay from ERCOT or PUC from 1/2016 to 2/9/2021. 7. How many people serving on any board, committee, or group for ERCOT or PUC board, committee or group is not a Texas resident and of those, how many reside outside the US? Please provide complete lists of all board, group, committee members on ERCOT and PUC boards committee or group that includes state or country of residence and if they are a US citizen from 1/2016 to 2/9/2021. 8. Do the ERCOT and PUC boards, Committee and Group members have to fill out financial disclosure forms? If so, please provide those records for all members of an ERCOT board, committee or group that were members from 2016 2/9/2021. 9. Who/what governing body approves any and all grants, tax credits and/or loans for solar, wind or other renewable energy source that is produced within the limits of ERCOT's and PUC's jurisdiction? The list shall include the person/entity that has approved the grant, tax credit and or loan and a detailed list of all the grants, tax credits and/or</p>

Public Information Requests - PUCT

2/19/21	Wishingrad, Sarah	American Oversight	<p>American Oversight requests that your office promptly produce the following: All records reflecting communications (including emails, email attachments, text messages, messages on messaging platforms (such as Slack, GChat or Google Hangouts, Lync, Skype, or WhatsApp), telephone call logs, calendar invitations, calendar entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any oral communications, summaries of any oral communications, or other materials) between (a) Members of the Public Utility Commission of Texas, including but not limited to Chairman DeAnn Walter, Commissioner Arthur D'Andrea, and Commission Botkin and (b) the officials specified below. Specified Officials: 1. Bill Magness, Electric Reliability Council of Texas (ERCOT) President and CEO 2. Jeyant Tamby, ERCOT Senior Vice President and Chief Administrative Officer 3. Kenan Ögelman, ERCOT Vice President of Commercial Operations 4. Woody Rickerson, ERCOT Vice President of Grid Planning and Operations 5. Greg Abbot, Governor of Texas 6. Luis Saenz, Chief of Staff to Texas Governor Abbott Please provide all responsive records from February 8, 2021, through the date a search is conducted. American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. No category of material should be omitted from search, collection, and production.</p>
2/19/21	Wishingrad, Sarah	American Oversight	<p>American Oversight requests that your office promptly produce the following: Any formal or informal assessment or analysis regarding the reliability, integrity, storm-readiness, or ability to withstand a major weather event of the Texas energy grid created by or provided to your office from January 1, 2020, through February 11, 2020. American Oversight seeks all responsive records regardless of format, medium, or physical characteristics. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. No category of material should be omitted from search, collection, and production.</p>
2/19/21	Cole, Carisa		A copy of the Texas Electric grid
2/22/21	Currie, Daniel		Severe weather preparation plans
2/22/21	Langford, Terri	Texas Standard/KUT	A log of all public information act requests made to the PUC between Jan. 1, 2020 to the present. A log of all complaints made to the PUC regarding ERCOT since Jan. 1, 2020.



Public Information Requests - PUCT

2/22/21	Langford, Terri	Texas Standard/KUT	A log of all public information act requests made to the PUC between Jan. 1, 2015 to Dec. 31, 2019. A log of all complaints made to the PUC regarding ERCOT since Jan. 1, 2015 to Dec. 31, 2019.
2/22/21	Maberry, Adrianna	Lone Star Project	Any shapefiles with the power outage points of the past week and any other attribute information that would be connected with such a file, including time of outage and length. These shapefiles hopefully also include outages on the transmission system, geographic location of transmission system facilities, outages by utilities, outages on the distribution system, as well as geographic locations for the various entities that make up the entire connected system.
2/23/21	Stehling, Ann	Cobb & Counsel	The following information, for the time period of January 1, 2017 to December 31, 2020: 1. All bids and/or proposals submitted for any contract valued at \$150,000 or more. 2. All evaluations and scoring for bids and/or proposals submitted for any contract valued at \$150,000 or more.
2/23/21	Trahan, Jason	WFAA-TV, Dallas	For the period from Feb. 8, 2021, to Feb. 22, 2021: + Emails and text messages (including on personal devices or personal messaging platforms if they pertain to state business) of DeAnn Walker, Arthur D'Andrea and Shelly Botkin sent to, or received by anyone at Vistra.
2/23/21	Olaniji, Victor, Ph.D.		1. Weather Emergency Preparedness Report on Power Generation Weatherization Preparedness submitted to the Texas Legislature at the end of September 2012 as required by Section (d) of TX Util 186.007 2. Winter Weather Emergency Preparedness Report on Power Generation Weatherization Preparedness submitted in 2020 3. Emergency Operations Plans submitted for the report in (2) above by the Electric Utilities within the ERCOT Power Region 4. Recommendations made by PUC on improving emergency operations plans and procedures in order to ensure the continuity of electric service as stipulated in Section (a) Subsection (4) of TX Util 186.007 (2019) 5. Latest version of PUC Disaster Recovery and Business Continuity Plan plus result of latest test of the plan
2/23/21	Zottarelli, Lisa	Univ. of Tenn. - Knoxville	Information about the electric power service interruptions in Texas between Saturday, February 13, 2021 thru Saturday February 20, 2021. I am specifically seeking electric service interruptions (blackouts, brownouts, or other general service interruptions) by zip code in the State of Texas in one hour or shorter time intervals. I am requesting that the information be provided by percent of zip code experiencing a service disruption, or some other measure (even yes or no) at the zip code level.
2/23/21	Ellis, Joe	KVUE	All Emails and text messages (including on personal devices or personal messaging platforms if they pertain to state business) of DeAnn Walker, Arthur D'Andrea and Shelly Botkin sent to, or received by, ERCOT's Dan Woodfin, Bill Magness or Sally Talberg.
2/23/21	Dearman, Eleanor	Fort Worth Star-Telegram	Emails or other communications to and from Executive Director Tomas Gleason and Public Utility Commission of Texas commissioners, including Chair DeAnn Walker, that contain the following keywords: • Weather • Cold • Ice • Freeze • Freezing • Snow • Electricity • Power • Outage • Blackout • Gas • Solar • Wind • Generator. I am requesting communications from the time period of Feb. 7, 2021 to now.
2/23/21	Ball, Andrea	USA Today	All online and telephone consumer complaints to PUC filed between 1/01/2016 and 2/23/21

Public Information Requests - PUCT

2/23/21	Texas Accountability	Texas Accountability	<p>1. Please provide the following information for all current Public Utility Commission of Texas employees: • First name • Last name • Number of years employed at • Annual salary 2. Please provide the following information for all registered electricity providers and power generation companies: • Total number of complaints filed against the company from January 1, 2010 through December 31, 2020. 3. Please provide all email correspondence sent and received by the following individuals from February 8, 2021 through February 22, 2021: • DeAnn T. Walker • Arthur C. D'Andrea • Shelly Botkin</p> <p>All email, video, and text-message communications between Public Utility Commission officials and officials and/or representatives for Vistra Corp, from February 8 through February 19.</p> <p>According to Texas Administrative Code §25.52 section E, subsections 1 and 2, utilities are required to provide "Notice of significant interruptions" to the PUCT. I am requesting all initial notices and summary reports provided to the PUCT, pursuant to §25.52, since Sunday 2/14/21. Additionally, Texas Administrative Code §25.53 requires electric utilities (including transmission and distribution utilities), power generation companies (PGCs), retail electric providers (REPs), and the Electric Reliability Council of Texas (ERCOT) to have an "Electric Service Emergency Operations Plans" on file with the PUCT. I am requesting a copy of all of the most recent emergency operations plans on file with the PUCT for every covered entity pursuant to §25.53.</p> <p>Updated to the below request to include the following "email as well: @vistracorp.com." [Received on 3/1/2021] Copies of the following individuals email communication, including attachments, sent and received between February 1, 2021 through February 17, 2021: • Chairman DeAnn T. Walker • DeAnn Walker's Commissioner's Advisor • DeAnn Walker's Executive Assistant • Commissioner Arthur C. D'Andrea • Commissioner Shelly Botkin • Davida Dwyer, Commissioner Advisor • Donna Johnson, Executive Assistant • Barksdale English, Commissioner Advisor • Rose Puente, Executive Assistant With representatives of the following entities: • ERCOT (@ercot.com) • Railroad Commission of Texas (@rrc.texas.gov) • Vistra (@vistra.com) • NRG (@nrg.com) • Exelon (@exeloncorp.com) • Calpine (@calpine.com)</p> <p>Any and all enforcement actions taken against those found to have not provided reliable service, including violations of PURA 39.151. This data should include the year, total fines and any underlying data or reports (investigative findings) detailing the failure.</p> <p>Copies of any and all emails received by commissioners DeAnn T. Walker, Arthur C. D'Andrea and Shelly Botkin from February 12, 2021, to February 22, 2021, containing any or all of the following keywords: Uri, polar vortex, power outage, ERCOT, electrical grid, blackout, winter storm, winterization and reliability. This request also includes the same communications for Thomas Gleeson.</p> <p>-a database of all informal complaints filed with the Commission's Customer Protection Division in the years 2011 and 2021. -a database of all formal complaints filed with the Commission in the years 2011 and 2021.</p>
2/23/21	Miller, Justin	Texas Observer	
2/23/21	Tait, Daniel	Energy & Policy Institute	
2/24/21	Kasper, Matt	Energy & Policy Institute	
2/25/21	McGaughy, Lauren	The Dallas Morning News	
2/25/21	Collins, Chris	The Texas Observer	
2/25/21	Miller, Justin	Texas Observer	

## Public Information Requests - PUCT

2/25/21	Farmer, Franklin		In 2011, Senator Glen Hegar passed Senate Bill 1133 requiring the Public Utility Commission (PUC) to report on electric utilities preparedness for severe weather, such as a freeze. Under the Texas Public Information Act, I am requesting electronic copies of the following records: 1. Any correspondence, including but not limited to emails, letters, text messages or fax, between Glenn Hegar and PUC employees regarding Senate Bill 1133; 2. Any correspondence, including but not limited to emails, letters, text messages or fax, between Lisa Craven and PUC employees regarding Senate Bill 1133; 3. Any correspondence, including but not limited to emails, letters, text messages or fax, between Melissa Hamilton and PUC employees regarding Senate Bill 1133; 4. Any correspondence, including but not limited to emails, letters, text messages or fax, between Peter Winckler and PUC employees regarding Senate Bill 1133; 5. Copies of all reports submitted by the PUC to the Legislature as required by Senate Bill 1133. The time frame for this request is January 2011 through December 2014.
2/25/21	Price, Asher	Austin American Statesman	1. Names and last dates of service of advisers/chiefs of staff to PUC commissioners since 2010. 2. Please also send me the list of names, title and last dates of service for former executive-level officials at the PUC, including division managers, since 2010. (If the PUC has organizational charts going back to 2010, you may just send me those.) The following information: • All text, email and other written correspondence between DeAnn Walker and Curt Morgan (CEO of Vistra Energy), • All text, email and other written correspondence between DeAnn Walker and other employees of Vistra Energy • All text, email and other written correspondence between DeAnn Walker and Mauricio Gutierrez (CEO of NRG Energy) • All text, email and other written correspondence between DeAnn Walker and other employees of NRG Energy ... records dated between Feb. 1, 2021 and Feb. 19, 2021.
2/25/21	Connelly, Christopher	KERA News	The following information: • All text, email and other written correspondence between Arthur D'Andrea and Curt Morgan (CEO of Vistra Energy), • All text, email and other written correspondence between Arthur D'Andrea and other employees of Vistra Energy • All text, email and other written correspondence between Arthur D'Andrea and Mauricio Gutierrez (CEO of NRG Energy) • All text, email and other written correspondence between Feb. 1, 2021 and Feb. 19, 2021.
2/25/21	Connelly, Christopher	KERA News	The following information: • All text, email and other written correspondence between Shelly Botkin and Curt Morgan (CEO of Vistra Energy), • All text, email and other written correspondence between Shelly Botkin and other employees of Vistra Energy • All text, email and other written correspondence between Shelly Botkin and Mauricio Gutierrez (CEO of NRG Energy) • All text, email and other written correspondence between Feb. 1, 2021 and Feb. 19, 2021.
2/25/21	Connelly, Christopher	KERA News	The following information: • All text, email and other written correspondence between Shelly Botkin and Curt Morgan (CEO of Vistra Energy), • All text, email and other written correspondence between Shelly Botkin and other employees of Vistra Energy • All text, email and other written correspondence between Shelly Botkin and Mauricio Gutierrez (CEO of NRG Energy) • All text, email and other written correspondence between Feb. 1, 2021 and Feb. 19, 2021.
2/25/21	Brown, Greg		...everything surrounding the decision to charge \$9.00 a KWH "any documentation, communication, and/or calculations for the \$9.00 KWH"
2/25/21	Avila, Jaie	News 4, San Antonio	All power generator winterization/weatherization reports filed with PUC during calendar year 2020 and 2021.

Public Information Requests - PUCT

2/25/21	Connelly, Christopher	KERA News	<p>The following information: • All text, email and other written correspondence between Thomas Gleeson and Curtis Morgan (CEO of Vistra Energy), • All text, email and other written correspondence between Thomas Gleeson and other employees of Vistra Energy • All text, email and other written correspondence between Thomas Gleeson and Mauricio Gutierrez (CEO of NRG Energy) • All text, email and other written correspondence between Thomas Gleeson and other employees of NRG Energy ... records dated between Feb. 1, 2021 and Feb. 19, 2021.</p>
2/26/21	Greenberg, Jared		<p>1. All of the combustion turbine (CT) power plants in Texas how many of them can run on other fuel source, than natural gas? 2. How many of the CTs are simple cycle? And combined cycle? 3. What are the heat rates of all the CTs plants in Texas. 4. What the storage fuel capacity of the CTs that can run on a different fuel source? 2 days, 7 days etc.... 5. What is the dispatch order when a black out occurs? 6. How many CTs are black start capable? Meaning they can startup with having the grid supply power to the CT plant. 7. How does Texas control voltage VARs? <a href="https://energycentral.com/c/tr/understanding-coordinated-voltage-and-var-control-distribution-systems-power">https://energycentral.com/c/tr/understanding-coordinated-voltage-and-var-control-distribution-systems-power</a></p>
2/26/21	Parks, Eva	NBC 5 - Dallas-Fort Worth	<p>All complaints submitted to PUC concerning winter storm 2021. Please search Feb 10 through Feb 25 Because the complaints are filed online: we are requesting them in a digital format like Microsoft excel.</p>
2/26/21	Parks, Eva	NBC 5   Dallas-Fort Worth	<p>All emails to/from DeAnn Walker containing any of the following phrases (weather, cold, freezing, winterize, winterization, ice, snow, storm, frigid, temperatures, outages, capacity, gas, cost, supply). Time frame for this request is February 7th, 2021 to February 22, 2021</p>
2/26/21	Diaz, Mario	KPRC-TV	<p>KPRC-TV is requesting all correspondence - digital and written communications - to and/or from the individual listed below from February 11, 2021 to February 17, 2021: • DeAnn Walker • Arthur C. D'Andrea • Shelly Botkin • Thomas Gleeson To expedite the search, we are interested in communication that includes any of the following terms: • Water • Generator • Pumps • Distribution • Flow • Fail • Back • Danger • Freeze • Frozen • Broken • Friends • Family • Director • Governor • Power • Plant • Pipe • Luis • Supply • Main • Property • Workers • Operations • PSI • Pressure • Infrastructure • Integrity • Cracked • Fix • Failure • Electricity</p>
2/26/21	Rogalski, Jeremy	KHOU - 11, Houston	<p>From February 14, 2021 to present [2/26/2021 at 11:15 a.m.], electronic copies of any and all post-event analyses/after action reports/etc. from power generators to the PUC regarding failure of equipment during the winter storm.</p>
2/26/21	Planas, Roque	HuffPost	<p>Please provide all emails sent or received from the accounts of Chairwoman DeAnn Walker, Commissioner Arthur D'Andrea and Commissioner Shelly Botkin from Feb. 4, 2021 to Feb. 15, 2021.</p>
2/26/21	Hacker, Holly	Dallas Morning News	<p>Please add voicemails to the list of communications (emails, text messages, et al) Copies of communications from Feb. 8-19, 2021 (including emails, text messages and instant messages) between any of the three PUC commissioners and people at any of these agencies or offices. : ERCOT TDEM Gov. Abbott's office Lt. Gov. Patrick's office Rep. Chris Paddie's office Sen. Kelly Hancock's office</p>

Public Information Requests - PUCT

2/26/21	Hacker, Holly	Dallas Morning News	Copies of communications from Feb. 8-19, 2021 (including emails, text messages, instant messages and voicemails) between any of the three PUC commissioners and anyone with the Railroad Commission of Texas.
2/26/21	Jervis, Rick	USA Today	- A list with names and addresses of all power plants that failed due to freezing/weather during weather event of week of Feb 14 – Feb 19. - All inspection reports verifying weatherization status, as reported or not reported in official documents, of above-mentioned failed plants. - Documents/reports detailing all penalties/fines given to power plants for failure to properly winterize from 2018-2021. - Minutes of any emergency meetings between PUC officials (commissioners, staffers, etc) and other agencies and/or the Texas governor's office to discuss winter storm and power outages, both leading up to and during the event.
2/26/21	Johnson, Brad	The Texan	All email communications from PUC Commissioners DeAnn Walker, Arthur D'Andrea, and Shelly Botkin during the timespan of 2/8/21 and 2/26/21 pertaining to the winter weather event and electricity blackouts that occurred the third week of February. This should include but is not limited to email communications between the commissioners themselves but also from each commissioner to any electricity generator, retailer, energy source producer, transmission and delivery utility, or any other individual, group, or corporation involved in supplying electricity. This should also include any email communications any commissioner had with representatives of the Electric Reliability Council of Texas, the Governor's Office, or any other elected official or political agency.
3/1/21	Weber, Paul	Associated Press	Records generated surrounding the Texas blackouts that began the morning of Feb. 15. The timeframe for these records is Feb. 7, 2020, through the fulfillment of this request. The categories of records covered under this TPIA request include the following 1) Copies of communication such as emails sent (including by CC, BCC or forward) to or from personnel at the Electric Reliability Council of Texas, including but not limited President Bill Magness; Senior Director of System Operations Dan Woodfin; and Senior Vice President Jeyant Tamby. With regard to search criteria: In general, searches should be broad enough to encompass any discussion (whether internal or external) of the approaching winter storm and the Texas power grid. Electronic search terms used to find responsive records should include but not be limited to "storm"; "grid"; "blackouts"; "rolling"; "outages"; "generators"; "plants"; "power"; and "freeze"
3/1/21	Weber, Paul	Associated Press	Records generated surrounding the Texas blackouts that began the morning of Feb. 15. The timeframe for these records is Feb. 7, 2020, through the fulfillment of this request. The categories of records covered under this TPIA request include the following 1) Copies of communication such as emails sent (including by CC, BCC or forward) to or from personnel at the Office of the Governor, including but not limited to Gov. Greg Abbott; Chief of Staff Luis Saenz; Deputy Chief of Staff Jordan Hale; Deputy Chief of Staff Gardner Pate; and Communications Director John Wittman. With regard to search criteria: In general, searches should be broad enough to encompass any discussion (whether internal or external) of the approaching winter storm and the Texas power grid. Electronic search terms used to find responsive records should include but not be limited to "storm"; "grid"; "blackouts"; "rolling"; "outages"; "generators"; "plants"; "power"; and "freeze"

Public Information Requests - PUCT

3/1/21	Koenig, David	Associated Press	A list of each power-generating unit in the Electric Reliability Council of Texas (ERCOT) network that stopped providing power to that network at any time between Feb. 8, 2021, and Feb. 21, 2021. For each time a power-generating unit ceased providing power to the ERCOT network, please indicate the date and time of that stoppage and, if applicable, when the unit resumed providing power to the ERCOT network.
3/1/21	Hanson, Blake	Fox 4 - Dallas/Ft. Worth	Copies of public records including text messages, emails or other forms of written communication sent or received by: Public Utilities Commission Chair DeAnn T. Walker, Commissioner Arthur C. D'Andrea, Commissioner Shelly Botkin and Executive Director Thomas Gleeson between 2/08/21 and 2/17/21 which mention any of the following words/names/phrases -- "Vistra" "Craddick" "Governor" "Governor's Office" "ERCOT" "Magness" "Hancock" "grid" "rotating outages" "winterization" "blackout" "Saenz" and/or "Wittman". I am requesting an opportunity to inspect or obtain copies of public records including voicemails received by Public Utilities Commission Chair DeAnn Walker between 02/08/21 and 02/17/21.
3/1/21	Moden, Merle		A link on the Public Utility Commission of Texas website where I may locate: (1) the electric generating capacity in megaWatts of the Texas power grid for the years 2000 thru 2020 by type of generator, i.e., gas-fired, wind, coal, nuclear, solar, other, storage, etc.; (2) the peak demand in megaWatts of the Texas power grid for the years 2000 thru 2020; and, (3) the electric generation in kiloWatt-hours of the Texas power grid for the years 2000 thru 2020 by type of generator, i.e., gas-fired, wind, coal, nuclear, solar, other, storage, etc. If not available on this website, please provide this information, preferably in electronic format.
3/1/21	Dolese, Patricia	Regulatory Compliance Services	February 2021 Complaint Database

Public Information Requests - PUCT

2/26/21	Vasut, Cody	House of Representatives	<p>1. Please produce all documents and communications which refer or relate to any contemplated or issued subsequent winter weather emergency preparedness report contemplated by TEX. UTIL. CODE ANN. § 186.007(e). 2. Please produce all documents and communications which refer or relate to any inspection of any Plant from January 1, 2019 to the present regarding winterization of any equipment. 3. Please produce the agendas, minutes, attachments, and audio or visual recordings for each board meeting of the PUC which refer or relate to winterization of power generating facilities in the ERCOT power region from January 1, 2011 to the present. This Request does not seek any agendas, minutes, attachments, or audio or visual recording for any board meeting which are available online at puc.texas.gov to the general public. 4. Please produce all Emergency Operations Plans. 5. Please produce all communications which refer or relate to any Emergency Operations Plan. 6. Please produce all communications which refer or relate to any weather report, warning, or alert relating to the Event. 7. Please produce all communications on or prior to February 14, 2021 which refer or relate to any anticipated power outage relating to the Event. 8. Please produce a document listing capacity and peak power production for each Plant for each day from February 7, 2021 through February 24, 2021. 9. Please produce a document identifying the frequency present in the transmission lines of the ERCOT power region for each minute from 12:00 PM on February 14, 2021 through 12:00 PM on February 18, 2021. 10. Please produce all documents and communications which identify why each Plant generated less peak power output, tripped offline (in whole or in part), or otherwise lost power generating capacity during the Event. 11. Please produce all Initial Notices. 12. Please produce all communications which refer or relate to any Initial Notice. 13. Please produce all Summary Reports. 14. Please produce all communications which refer or relate to any Summary Report. 15. Please produce all documents and communications which refer or relate to any investigation or enforcement action by the PUC relating to the Event. 16. Please produce all documents and communications which refer or relate to the PUC's February 17, 2021 Order in PUC Project 51812. 17. Please produce all documents and communications which refer or relate to the PUC's February 16, 2021 Order in PUC Project 51617. 18. Please produce a document identifying the wholesale</p>
---------	-------------	--------------------------	--

Public Information Requests - PUCT

3/1/21	Root, Jay	Houston Chronicle	<ul style="list-style-type: none"> <li>Any and all communications, including but not limited to emails, text messages, messages on third party apps (such as WhatsApp, Signal, etc) and any other means sent to or from employees that were assigned to the now defunct Oversight &amp; Enforcement Division and that mention in any way the prioritization of the cases, between July 1, 2020 and the day this request is processed.</li> <li>Any and all communications, including but not limited to emails, text messages, messages on third party apps (such as WhatsApp, Signal, etc) and any other means sent to or from Commissioner DeAnn Walker that mention in any way the restructuring and/or elimination of the Division of Oversight &amp; Enforcement.</li> <li>Any and all calendars of PUC Commissioners between Jan. 1 and the day this request is processed.</li> <li>For all enforcement-related cases and investigations closed from Aug. 1, 2020 to the day this request is processed, please provide all documents and communications between the PUC and the company(ies) under investigation, including documents and communications sent prior to Aug. 1, 2020.</li> <li>All documents and communications, including but not limited to emails, text messages, messages on third party apps (such as WhatsApp, Signal, etc) and any other means, from July 1, 2020 to the day this request is processed, that relate to enforcement staffing, including but not limited to the reassignment or termination of employees. This should not be construed to be unlimited only to employees that worked in the Oversight and Enforcement Division of the PUC.</li> </ul>
3/1/21	Oberg, Ted	ABC News	A copy of her [Chairman Walker's] resignation letter
3/3/21	Collines, Christopher	The Texas Observer	Any and all reports submitted to the Public Utility Commission by the Texas Reliability Entity from Jan. 1, 2015, to Dec. 31, 2020, regarding the following matters: Industry noncompliance with state and/or federal standards; and fines levied on industry for noncompliance
3/3/21	Friedman, Scott	NBC 5 / KXAS-TV   Dallas-Fort Worth	<ul style="list-style-type: none"> <li>Records detailing the names/locations/owners of all power generation facilities that tripped off-line/shut down and were unable to provide generation during the 2021 winter storm event from February 13th-18th 2021. For any such plant we request any record the PUC and/or ERCOT has received detailing why each plant was unable to provide power for a period of time. This would include but is not limited to any correspondence that the PUC and/or ERCOT has received in response to any request for information issued to plant operators/owners. It would also include but is not limited to any such documentation the PUC and/or ERCOT has provided to Texas legislators in response to their requests for information about why some plants were not able to provide generation during storm.</li> </ul>



Public Information Requests - PUCT

3/3/21	Friedman, Scott	NBC 5 / KXAS-TV   Dallas-Fort Worth	<p>• All emails sent to/from any of the three PUC Commissioners (DeAnn Walker, Arthur D'Andrea, Shelly Botkin) from February 10th to 18th 2021 which contain any of the following phrases in the subject line or the body of the email: (weather, snow, ice, cold, freezing, storm, conservation, outage, outages, rolling, blackout, blackouts, generation, supply, demand, load, capacity, load shed, gas, EEA, ERCOT, Magness, Abbott, Governor, Craddick). For any such email we also request any email attachments.</p> <p>Most recently updated Public Utility Commission Staff Roster, and Public Utility Commission Division Roster.</p> <p>Maps showing the past, present and future locations of underfrequency relays in Texas. This includes across Oncor's service area, in addition to the whole state of Texas</p> <p>PUC March Roster (telephone numbers) for personnel in respective departments and also the alphabetical listing</p> <p>All emails to and from ERCOT employees and directors regarding the Winter Storm Emergency and the decision to have the blackouts all over Texas.</p> <p>1. Any and all communications, including but not limited to any attachments such as memoranda and/or proposed legislation and/or proposed rules or emergency plans, sent to or from Jennifer Hubbs, and any of these communications that were forwarded by others between Jan. 1, 2013 through April 10, 2013. Please including but not limit this request to any such communications she sent to Katie Rich and/or Keith Rogas and/or David Featherston, between those dates. 2. Grant package materials and products, including but not limited to any deliverables and/or after-action reports, pursuant to the U.S. Department of Energy Grant #DE-OE0000092 as authorized under the American Recovery and Reinvestment Act.</p>
3/3/21	Campbell, Hanna	Lloyd Gosselink Rochelle & Townsend, P.C.	
3/3/21	Trahan, Jason	WFAA-TV   Dallas, Tx.	
3/3/21	Gullickson, Grieg	AEP Texas	
3/3/21	McCarty, Sally		
3/3/21	Root, Jay	Houston Chronicle	
3/3/21	Danowsky, Jason	FosterDanowsky LLP	<p>All instances in which the PUC has set a price in the ERCOT Electric Market? For the sake of clarification, I am not looking for: • Tariff approvals, dispute resolutions, or waivers granted to individual entities, since those are in response to specific cases with specific fact situations, rather than market-wide prices; • Rulemaking proceedings, since those establish formulae, directives, etc., rather than specific prices.</p> <p>Any records received by the PUC and or Commissioner Arthur D'Andrea detailing the terms of any termination agreement / separation agreement / settlement or revised employment agreement offered to ERCOT CEO Bill Magness in conjunction with the ERCOT Board of Directors decision on March 3, 2021 to exercise the 60 day termination clause in Magness' contract.</p>
3/4/21	Friedman, Scott	NBC 5, KXAS-TV, Dallas-Ft. Worth	

Public Information Requests - PUCT

3/5/21	Lewis, Alec		Copies of public records that disclose any and all communications from providers or generators of electrical power to the Public Utility Commission of Texas ("PUC") or the Electric Reliability Council of Texas ("ERCOT"). Specifically, for the time period of February 12, 2021 to February 22, 2021, I request copies of any communications to the PUC or ERCOT from private providers or generators of electricity, in which the provider notified the PUC or ERCOT that their generating units were fully or partially shut down. The communications would include: • Language of concern for production; • Notification that the provider or generator of electricity is incapable of producing power; • The date and time stamp of when these communications were sent; • To whom these communications were sent to (if no personal information can be sent, the office or position is acceptable, or names may be redacted) Also, if the PUC or ERCOT maintains any charts or spreadsheets that include such information, I request a copy of that, as well.
3/8/21	Miller, Justin	Texas Observer	1. All correspondence between former Chair DeAnn Walker and/or members of her staff and employees and/or representatives of Texas Reliability Entity, Inc., relating to the Entity's 2019 contract (No. 473-19-0008) with the Public Utility Commission, beginning January 1, 2019 and up to and including the date of records retrieval. 2. All correspondence from former Chair DeAnn Walker and/or members of her staff that include the following keywords: "Texas Reliability Entity"; "TRE"; "Reliability Entity," beginning January 1, 2019 and up to and including the date of records retrieval.
3/10/21	Goldenstein, Taylor	Houston Chronicle	A list of all critical load public safety customers and critical load industrial customers and their addresses. If the only place that is found is in their emergency operations plans, a copy of all of those received by PUC in 2020 would also suffice.
3/10/21	Goldenstein, Taylor	Houston Chronicle	-Copies of all communications, including that on personal devices and social media and other messaging applications, between any member of the PUC and any member of ERCOT related to records requests received by ERCOT -Records of a hiring of any outside counsel paid for by the PUC in 2021, including but not limited to Jay B. Stewart of Hance Scarborough, LLP, as well as any records of work done by them, such as invoices -Copies of all open records act requests received by your agency from Feb. 1, 2021 through present.

Public Information Requests - PUCT

<p>3/15/21 Parks, Eva</p>	<p>NBC 5, Dallas-Ft. Worth</p>	<p>1. All emails sent to/from any of the three PUC commissioners (D'Andrea, Botkin or Walker) and any email address ending with ercot.com or rrc.texas.gov or gov.texas.gov or tdem.texas.gov. Time frame for this request is from February 10th-February 19th 2021. For any such email we request all email attachments. If a personal email was utilized by a commissioner, we request those emails as well. 2. All emails and text messages sent to/from commissioners D'Andrea or Botkin or Walker and any of the following individuals: Gov. Greg Abbott, Railroad Commissioner Christi Craddick, TDEM Chief Nimm Kidd, Luis Saenz, Chief of staff for Governor Abbott, Bill Magness (ERCOT), Dan Woodfin (ERCOT) from any email address those persons use. Time frame for this request is February 10th-February 19th, 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well. 3. All emails and text messages sent from any of the three commissioners (D'Andrea, Botkin or Walker) to any other commissioner from February 10th-February 19th 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well. 4. Any email sent to or from any of the three commissioners D'Andrea, Botkin and Curt Morgan or any other person employed by VISTRA Energy/Luminant. For any such email we request all email attachments. Time frame for this request is February 10th-February 19th, 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well. 5. Any email sent to or from Andrew Barlow from Leslie Sopko and Lindsey Hughes. Time frame for this request is February 10th-February 19th, 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well.</p>
<p>3/15/21 Parks, Eva</p>	<p>NBC 5 Dallas-Fort Worth</p>	<p>1. All audits, reviews, inspections, evaluations or other documents in the possession of the PUC which look at the operational and/or financial performance of ERCOT from January 1, 2017 to February 9th, 2021. 2. All PUC evaluations of Texas grid reliability and sufficiency of power supplies to meet the state's needs that were produced from January 1, 2017 to February 9th, 2021. 3. All PUC studies, reports looking at the issue of winterization or weatherization of power plants from January 1, 2017 to February 9th, 2021. 4. Any documents ERCOT provided to the PUC from February 8th to February 14th, 2021 detailing concerns about supply/demand of electricity, winter weather, the potential for power outages or rotating outages during an approaching winter storm. 5. All conflict of interest and personal financial disclosure statements submitted by PUC Commissioners Arthur D'Andrea, Shelly Botkin and DeAnn Walker during each of their entire tenures on the commission.</p>

Public Information Requests - PUCT

3/15/21	Wojciaczyk, Tom		I would like to request historical data as is available on a daily basis from the powertochoose.org website, <a href="http://www.powertochoose.org/en-us/Plan/ExportTOCsv">http://www.powertochoose.org/en-us/Plan/ExportTOCsv</a> . The website provides a daily snapshot of each REP plan offered via the site, but unfortunately does not provide a method of getting results from any past date. Is it possible to either get API access to the data or an electronic dump, in CSV format, of daily or weekly snapshots for calendar years 2017 - 2020? I am only requesting the same information that is available through the website and not requesting any confidential information be provided.
3/15/21	Parks, Eva	NBC 5 Dallas-Fort Worth	Travel and expense reports for former PUC chair, DeAnn Walker, former commissioner Shelly Botkin and commissioner Arthur D'Andrea. Timeframe search is from 2019 to present date this request is fulfilled.
3/16/21	Dearman, Eleanor	Star Telegram	Text messages to and from Executive Director Tomas Gleeson, as well as Public Utility Commission of Texas commissioners current and former who have served in the post since Feb. 1 2020 containing the following subject matters: -The February winter storm in Texas -The February blackout/power outages in Texas - The resignation or termination of commissioners I request these records for the time period of Feb. 1 to the present. I request text communications set by and to these individuals and messages between the above parties.
3/16/21	Gregg, Cecil		I would love to see the number of licensed Electricity providers/REPs in each city/county over the years, dating as far back as records go. I am aware that deregulation occurred in 2002, but for the sake of thorough research, I would appreciate the numbers prior to 2002 as well.
3/16/21	Dearman, Eleanor	Star Telegram	Paper correspondences to and from Executive Director Tomas Gleeson and his office, as well as Public Utility Commission of Texas commissioners current and former who have served in the post since Feb. 1 2020, as well as their offices, containing any of the following subject matters: -The February winter storm in Texas -The February blackout/power outages in Texas - The resignation or termination of commissioners
3/17/21	Miller, Justin	Texas Observer	-All calendars or calendar entries for Public Utility Commissioners DeAnn Walker, Shelly Botkin, and Arthur D'Andrea, including any calendars maintained on their behalf, from January 1, 2021, through the date the search is conducted. I request that the calendars be produced in a format that includes all invitees, any notes, and all attachments. -All calendars or calendar entries, from January 1, 2021, through the date the search is conducted, for PUC executive director Thomas Gleeson. I request that the calendars be produced in a format that includes all invitees, any notes, and all attachments. Please do not limit your search to Outlook calendars; I request the production of any calendar—paper or electronic, whether on government-issued or personal devices—used for state business.

Public Information Requests - PUCT

3/18/21	Soraghan, Mike	E&E News	Copies of the following communications, electronic or otherwise (including "text messages"), since Feb. 13 between DeAnn Walker or Arthur D'Andrea or Tom Gleeson and the following: Carrie Bivens Any employee or representative of the Electric Reliability Council of Texas, Inc. (ERCOT). In the case of official electronic communications, that would include any account ending in @ercot.com Any employee or representative of the Railroad Commission of Texas Public (RRC). In the case of official electronic communications, that would include any account ending in @rrc.texas.gov.
3/18/21	Wade, Will	Bloomberg News	Copies of all schedules and calendars for Commissioner Arthur D'Andrea, from January 1, 2021, through March 16, 2021, the day of his resignation (the Records). I request that the Records be provided to me on computer files or, if not maintained on computer files, in the same format as they are currently maintained at the Texas PUC.
3/18/21	Steffy, Loren	Texas Monthly	Copies of all calendars and phone records for Commissioners DeAnn Walker, Arthur D'Andrea and Shelly Botkin back to Jan 1, 2017
3/18/21	Dent, Mark	Fort Worth Star-Telegram	-The daily schedule for PUC commissioner DeAnn Walker for all dates Feb. 1 through March 1. -The daily schedule for PUC commissioner Shelly Botkin for all dates Feb. 1 through March 5. The daily schedule for PUC commissioner Arthur D'Andrea for all dates Feb. 1 through March 15.
3/22/21	Price, Asher	Austin American Statesman	a list of any meetings (in person, telephonically, or virtually) Connie Trimble or Rebecca Zerwas had between March 26 2020 and April 17 2020 regarding the PUC's COVID-19 Electricity Relief Program (ERP). Please include a list of participants in the meetings and the meeting dates. Please also send me copies of any correspondence Connie Trimble or Rebecca Zerwas had (with each other or with others in the agency or with people outside the agency) about the COVID-19 Electricity Relief Program (ERP) between March 26 2020 and April 17 2020.
3/29/21	Okafor, Reuben		Copies of public records that provide detailed analysis of the Commission's response plans and impact assessment to the February 2021 power outages in several homes in Texas due to the winter storm. I am requesting for documents that contain your detailed plans and the outcome of your response to the outage occurrences which include emergency dispatches, mapped out interventions, and after-action reports.
3/29/21	Avila, Jaie	SBGTV	The names of all energy companies that sold power and received elevated pricing from February 15th, 2021, when the PUC ordered real-time energy prices reflect firm load shed by setting prices at the value of lost load or VOLL, until February 19th when prices were no longer held at VOLL. Please include the date when each sale took place, the cost per megawatt hour and total amount each company received during that time period. Please send this data in a searchable, Excel spreadsheet, not PDF. If the PUC intends to request an opinion from the Texas Attorney General's Office as to whether prices are releasable, we ask that you release the names of the energy companies rather than wait for a ruling on prices.

Public Information Requests - PUCT

3/30/21	Stebel, George	Williamson Count GIS Manager	All utility provider information you have in geographic information systems (GIS) file format for the state of Texas. After the recent ice storm we are looking for GIS layers for the State of Texas electrical infrastructure including but not limited to utility service boundaries, substations, transmission lines or any other GIS map features PUC has that will allow us to better prepare for future regional incidents like fire, flooding, and weather related power outages. We are requesting the data in a gis file or compatible format to include but not limited to .shp, .gdb, web service, kmz, or AutoCAD file format.
3/30/21	Keel, John		The name, address and contact information for each firm or entity that submitted a proposal to: REQUEST FOR PROPOSALS FOR EXTERNAL AUDIT OF FEBRUARY 2021 EXTREME WEATHER EVENT, RFP Number: 473-21-00005 Project Number: 51903 NIGP Class Item: 946-20, 03/29/2021. I am not requesting a copy of the proposals.
3/30/21	Johnson, David	TX Dept of Housing & Community Affairs	Lists of providers ... with email addresses and phone numbers. I was hoping that there would be a way for us to receive a csv or Excel file that contains this data without the need for us clicking on each page in sequence and copy/pasting the data. Please let me know what would be required to obtain these documents. We would like this information for: Electric, Gas, Water/Wastewater, Sewer, and Telecom.
3/30/21	Gold, Russel	WSJ	Request No. 1: All emails sent by, received by (including cc'd and bcc'd) Chairman DeeAnn Walker between February 1, 2021 and March 1st, 2021. This request includes any and all emails associated with Ms. Walker, including public and non-public email addresses. Request No. 2: All emails sent by, received by (including cc'd and bcc'd) Commissioners Shelly Botkin and Arthur C. D'Andrea between February 1, 2021 and March 1st, 2021. This request includes any and all emails associated with Ms. Botkin and Mr. D'Andrea, including public and non-public email addresses. Request No. 3: Any written or digital communication from Curt Morgan of Vistra Corp., or any other communication made by a representation of Vistra, including its lobbyists, with a PUCT commissioner of staff members from Feb. 5th to Mar. 1st, 2021.
4/1/21	Kelaids, Jesse	TURKE & STRAUSS LLP	An index or list of complaints and complaint information to narrow production.
4/1/21	Dolese, Patricia	Regulatory Compliance Services	March 2021 Complaint Database - willing to receive without Notes columns
4/1/21	Guillickson, Grieg	AEP Texas	Division and Alphabetical Rosters
4/5/21	Gold, Russel	WSJ - Austin Bureau	All emails sent by, received by (including cc'd and bcc'd) Thomas J. Gleeson, executive director of the Public Utility Commission of Texas, between February 7th, 2021 and March 1st, 2021. This request includes any and all email addresses associated with Mr. Gleeson, including public and non-public email addresses.
4/5/21	Landeros, Luis	Landeros Law Firm	Multiple request related to (the) attached nine (9) subpoenas pertaining to records filed by the following entities: 1. Electric Reliability Council of Texas 2. AEP Texas, Inc. 3. Ambit Energy Holdings, LLC 4. CPL Retail Energy L.P. 5. Direct Energy LP 6. Green Mountain Energy Company 7. Reliant Energy Retail Holdings, LLC 8. Stream Energy Services LLC, and 9. TXU Electric Company. The subpoenas are for case styled Alonso et al. v. Electric Reliability Council of Texas; cause no. 2021CVH000413D1 filed in the 49th Webb County District Court.
4/6/21	Gold, Russel	WSJ - Austin Bureau	A list of all gas processing plants permitted by the TCEQ, including relevant information such as owner of record and physical location.

Public Information Requests - PUCT

4/8/21	Miller, Justin	Texas Observer	-Any and all agendas, minutes, and other memorandum produced in relation to the PUC internal Compliance Council monthly meetings to review open and potential enforcement investigations - from November 1, 2020 up to and including the date of the records are retrieved.
4/8/21	Klump, Edward	E&E News	The 2021 crisis communications plan for the Electric Reliability Council of Texas reviewed by the Public Utility Commission of Texas and any discussions of this plan via email through addresses ending in @ercot.com and @puc.texas.gov.
4/9/21	Ceckowski, Lauren	Jackson Walker LLP	A copy of the actual [open records] requests that are sent to the Public Utility Commission? We are looking for the requests related to the 2021 winter storm event from approximately February 16 to March 5. Additionally, is there a way to get the documents produced in response to another requestor?
4/12/21	Leyva, Linda		Information on all investor Owned utilities companies registered with your agency. I need date of company registered, the name, address, owner information or officers managing the company's.
4/12/21	Martin, Pedro		Copies of public records that shows historical data on whether a particular zip code (or a similar disaggregation level) had a power supply interruption and for how long for the time-span 13-20th February 2021.
4/12/21	Anders, Fred		Retail Electricity Provider (REP) 6-month-averaged Complaint Ratio data underlying the January 2021 - March 2021 Retail Electric Provider Complaint Scorecards (the latest of which is currently posted at <a href="http://www.powertochoose.org/scorecard/scorecard.pdf">http://www.powertochoose.org/scorecard/scorecard.pdf</a> ).
4/12/21	Cawood, Shane	Hartman Income REIT	1. What were the ERCOT-wide total of charges to customers of the Load Serving Entities for the period of 12:00 A.M., Friday, February 12, 2021 to and including 11:59 P.M., Saturday, February 20, 2021 (9 calendar days in 2021)? 2. What were the ERCOT-wide total of charges to customers of the Load Serving Entities for the period of 12:00 A.M. , Friday, February 14, 2020 to and including 11:59 P.M., Saturday, February 22, 2020 (comparable 9 calendar days in 2020)? 3. What was the total billing by ERCOT for energy provided for the full year of 2020? 4. What was the total billing by ERCOT for energy provided for the period of 90 hours while the \$9K/mWh cap was in-place between Monday, February 15, 2021 and Friday, February 19, 2021? 5. What was the total billing by ERCOT for energy provided for the period of 12:00 A.M., Friday, February 12, 2021 to and including 11:59 P.M., Saturday, February 20, 2021 (9 calendar days in 2021)? 6. What was the total billing by ERCOT for energy provided for the period of 12:00 A.M. , Friday, February 14, 2020 to and including 11:59 P.M., Saturday, February 22, 2020 (comparable 9 calendar days in 2020)? 7. For energy provided for the period of 12:00 A.M., Friday, February 12, 2021 to and including 11:59 P.M., Saturday, February 20, 2021: a. What amount of the charges from ERCOT to LSEs were paid directly by LSEs? b. What total amount was paid by their QSEs or financial backers (which would, in-turn, recover the payment for the charges from their LSEs)? c. What was the total amount billed to LSEs that also generate power? d. What the total amount paid to generators that also retail power as an LSE (REP, Coop or Muni)?
4/12/21	Dickey, Amanda	Austin Energy	PUC Division Roster

Public Information Requests - PUCT

4/12/21	Lewis, Emma	American Oversight	<p>Any formal or informal assessment or analysis regarding the reliability, integrity, storm-readiness, or ability to withstand a major weather event of the Texas energy grid created by or provided to your office from January 1, 2021, through February 11, 2021. In conducting your search, please understand the term "record" in its broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. We seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions. Our request includes any attachments to these records. No category of material should be omitted from search, collection, and production.</p>
4/13/21	Bricher, Todd	Travis County District Attorney	<p>1) All of Hearst Newspaper's PIA, Open Records Request and/or Public Information Request received by your agency between Feb. 1, 2021, and the present, and all the materials/records produced in response to those requests.</p>
4/13/21	Friedman, Scott	NBC 5	<p>1. All emails sent to/from PUC executive director Thomas Gleeson and any email address ending with ercot.com or rrc.texas.gov or gov.texas.gov or tdem.texas.gov. Time frame for this request is from February 10th-February 19th 2021. For any such email we request all email attachments. If a personal email was utilized by a commissioner, we request those emails as well. 2. All emails and text messages sent to/from Thomas Gleeson and any of the following individuals: Gov. Greg Abbott, Railroad Commissioner Christi Craddick, TDEM Chief Nimm Kidd, Luis Saenz, Chief of staff for Governor Abbott, Bill Magness (ERCOT), Dan Woodfin (ERCOT) from any email address those persons use. Time frame for this request is February 10th-February 19th, 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well. 3. All emails and text messages sent from Thomas Gleeson to any PUC commissioner from February 10th-February 19th 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well. 4. Any email sent to or from Thomas Gleeson and Curt Morgan or any other person employed by VISTRA Energy/Luminant. For any such email we request all email attachments. Time frame for this request is February 10th-February 19th, 2021. For any such email we request all email attachments. If a personal email or personal phone number was used by a commissioner, we request those messages as well.</p>
4/14/21	Campbell, Hanna	Lloyd Gosselink Rochelle & Townsend, P.C.	<p>Copies of the most recently updated Public Utility Commission Staff Roster, and Public Utility Commission Division Roster.</p>