

Process Overview Weather Moratoriums

CenterPoint Energy Competitive Retailer Relations Lee E. Doehring

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# Public Utility Commission of Texas Applicable Rules & Tariff



#### Substantive Rule

CHAPTER 25. SUBSTANTIVE RULES APPLICABLE TO ELECTRIC SERVICE PROVIDERS.

Subchapter R. CUSTOMER PROTECTION RULES FOR RETAIL ELECTRIC SERVICE.

a stated date of disconnection with the words "disconnection notice" or similar language prominently displayed. If the REP has offered and the customer has agreed for the customer and/or emergence contact to receive disconnection notices from the REP by email, a separate email with the words "disconnection notice" or similar language in the subject line shall be also be sent in addition to the separate mailing or hand delivered notice. Except as provided in this subsection, the notice shall comply with the requirements of subsections (1) and (m) of this section.

#### (i) Disconnection of energy assistance clients.

- (1) A REP having disconnection authority under the provisions of subsection (b) of this section shall not authorize a disconnection for nonpayment of electric service to a delinquent residential customer for a billing period in which the REP receives a pledge, letter of intent, purchase order, or other notification that the energy assistance provider is forwarding sufficient payment to comtine service provided that such pledge, letter of intent, purchase order, or other notification is received by the due date stated on the disconnection notice, and the customer, by the due date on the disconnection notice, either pays or makes payment arrangements to pay any outstanding debt not covered by the nergy assistance provider.
- (2) If an energy assistance provider has requested monthly usage data pursuant to §25.472(b)(4) of this title (relating to Privacy of Customer Information), the REP shall extend the final due date on the disconnection notice, day for day, from the date the usage data was requested until it is provided.
- (3) A REP shall allow at least 45 days for an energy assistance provider to honor a pledge, letter of intent, purchase order, or other notification before submitting the disconnection request to the TDU.
- (4) A REP may request disconnection of service to a customer if payment from the energy assistance provider's pledge is not received within the time frame agreed to by the REP and the energy assistance provider, or if the customer fails to pay any portion of the outstanding balance not covered by the pledge.
- (j) Disconnection during extreme weather. A REP having disconnection authority under the provisions of subsection (b) of this section shall not authorize a disconnection for nonpayment of electric service for any customer in a county in which an extreme weather emergency occurs. A REP shall offer residential customers a deferred payment plan upon request by the customer that complies with the requirements of \$25.480 of this title (relating to Bill Payment and Adjustments) for bills that become due during the weather emergency.
  - (1) The term "extreme weather emergency" shall mean a day when:
    - (A) the previous day's highest temperature did not exceed 32 degrees Fahrenheit, and the temperature is predicted to remain at or below that level for the next 24 hours anywhere in the county, according to the nearest National Weather Service (NWS) reports; or
    - (B) the NWS issues a heat advisory for a county, or when such advisory has been issued on any one of the preceding two calendar days in a county.
  - (2) A TDU shall notify the commission of an extreme weather emergency in a method prescribed by the commission, on each day that the TDU has determined that an extreme weather emergency has been issued for a county in its service area. The initial notice shall include the county in which the extreme weather emergency occurred and the name and telephone number of the utility contact person.
- (k) Disconnection of master-metered apartments. When a bill for electric service is delinquent for a master-metered apartment complex:

§25.483--4

effective 12/11/13 (P 41614)



#### 5.3.7.4 PROHIBITED SUSPENSION OR DISCONNECTION

(1) Except in the case of suspensions of service related to dangerous conditions, clearance requests, or move-out requests, Company shall not disconnect or suspend Delivery Service to Retail Customer in the following situations:

- (A) On a day, or on a day immediately preceding a day, when personnel of Company are not available to the public for the purpose of reconnecting Delivery Service;
- (B) For delinquency of payment to Company by Retail Customer's Competitive Retailer;
- (C) During "extreme weather conditions" as defined in the Commission's customer protection rules;
- (D) At a permanent, individually metered dwelling unit of a Retail Customer for nonpayment of amounts billed directly to Retail Customer by Company pursuant to the Company's Tariff, when that Retail Customer establishes that disconnection of Delivery Service will cause some person residing at that residence to become seriously ill or more seriously ill.
  - Each time a Retail Customer seeks to avoid disconnection of Delivery Service under subsection (D), the Retail Customer must accomplish all of the following by the stated date of disconnection:
    - (I) have the subject person's attending physician (for purposes of this subsection the term "physician" shall mean any public health official, including, medical doctors, doctors of osteopathy, nurse practitioners, registered nurses, and any other similar public health official) call or contact the Company by the date of the disconnection;
    - (II) have the subject person's attending physician submit a written statement to Company; and

### Weather Moratorium – Old Process



- CenterPoint Energy received or obtained weather alerts by:
  - Employees monitoring the NWS website; or
  - Email / Text messages to employees from public sources like Weather Channel and AccuWeather.
- Employees had to read and manually interpret the alerts to determine the applicable counties and effective times.
- Once evaluation was completed and a Heat Advisory was confirmed for a county in the CenterPoint Houston territory, a configuration flag had to be manually set to stop the execution of DNP orders.

#### Your Severe Weather Watches and Warnings

#### Houston, TX Your Radar | Current Conditions | 15-Day Forecas

URGENT - WEATHER MESSAGE National Weather Service Houston/Galveston TX 202 PM CDT Mon Jul 8 2019

...Heat Advisory in Effect through this Evening.

A Heat Advisory is in effect for the counties along and south of I-10. Observations this afternoon have shown heat indicies between 106 to 111 degrees. Hot and humid conditions will continue tomorrow, and another Heat Advisory may be needed. ...HAAT ADVISORY IN EFFECT UNTIL 8 PM CDT THIS EVENING...

The National Weather Service in Houston/Galveston has issued a Heat Advisory, which is in effect until 8 PM CDT this evening.

\* EVENT...Heat index values between 106 to 111.



# Weather Moratorium Challenges – Old Process

- Manual Monitoring for advisories to assure "extreme weather" event trigger was met
  - Challenges after hours and during commutes
- Multiple parties with critical roles
- Manual setting of flag (Time Sensitive Process)
- Opportunities for human error due to multiple touch points
- Timing gaps with CR awareness and continuance of order submission
- Manual entry of re-connects as needed to restore service
- Limited Automation

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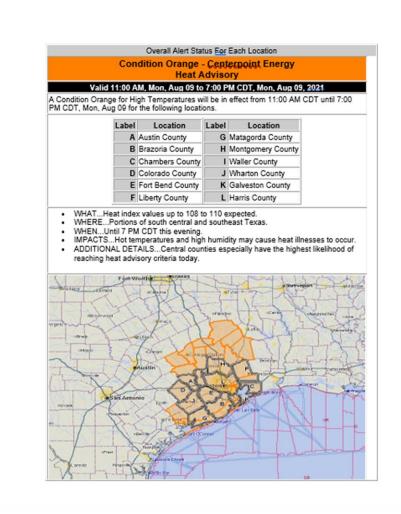
### Weather Moratorium - New Process

- Automation to the fullest extent possible
  - System flag set by StormGeo notification API Interface
- Streamlined internal communications
- Strong partnership with external weather service StormGeo
- Flexibility to customize as needed (Versatile Maps)

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### **StormGeo Email Notification**





| Label | Location             | Highest Alert Status  |       |  |
|-------|----------------------|---|-------|--|
| A     | Austin County        | Condition Orange - Heat Advisory from 11:00 AM CDT to 7:00 PM CDT, Mon, Aug 09              |       |  |
| в     | Brazoria County      | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| С     | Chambers<br>County   | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
|       | Colorado County      | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| E     | Fort Bend<br>County  | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| F     | Liberty County       | Condition Orange - Heat Advisory from 11:00 AM CDT to 7:00 PM CDT, Mon, Aug 09              | None. |  |
| G     | Matagorda<br>County  | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| н     | Montgomery<br>County | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| 1     | Waller County        | aller County Condition Orange - Heat Advisory from 11:00 AM CDT to 7:00 PM CDT, Mon, Aug 09 |       |  |
|       | Wharton County       | Condition Orange - Heat Advisory from 11:00 AM CDT to 7:00 PM CDT, Mon, Aug 09              |       |  |
| к     | Galveston<br>County  | Condition Orange - Heat Advisory from 11:00 AM CDT<br>to 7:00 PM CDT, Mon, Aug 09           |       |  |
| L     | Harris County        | Condition Orange - Heat Advisory from 11:00 AM CDT to 7:00 PM CDT, Mon, Aug 09              |       |  |

### Weather Moratorium - New Process

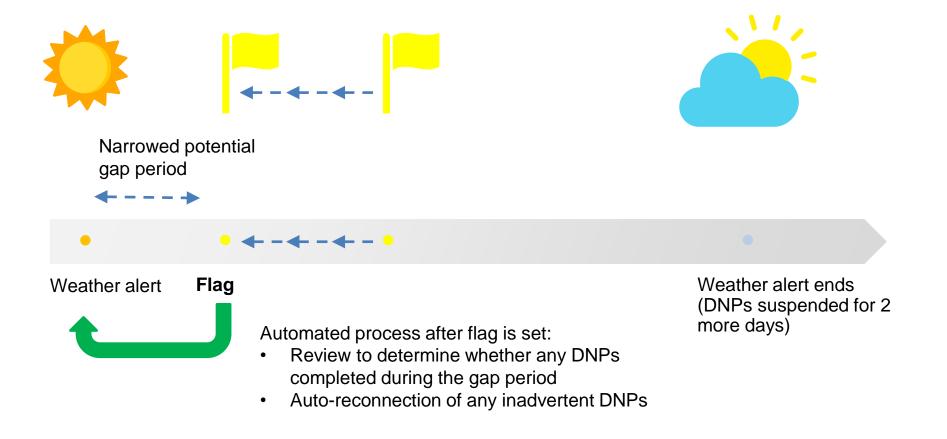
- Auto-Implementation of Weather Alert Flags
  - Once CenterPoint Energy receives automated API notification our systems set the weather flags and the DNP moratorium.
- Current Advisory Notification Process Improvements
  - Instead of alerts from public sources, CenterPoint Energy's weather contractor sends emails and texts to the appropriate personnel at the Company.
- Auto-Reconnection of inadvertently disconnected premises
  - The CenterPoint Energy system records effective time of Heat Advisory and time the flag was set. The system then identifies DNP transactions executed during the time gap, and auto-reconnects any premises that were disconnected.

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# Weather Moratorium - New Process

Process to set weather flag:

Automated DNP flag upon receipt of weather alert via API



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# Weather Moratorium – Communications (New)

- Approach that errs on the side of caution and consumer protection
- Simplified and Standardized Market Notices to clearly set expectations and clearly outline dates
- Market collaboration development of joint market ListServ for weather moratorium notices

✤ <u>WEATHER\_MORATORIUMS@LISTS.ERCOT.COM</u>

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#### **Market Notice Initial**



#### SUBJECT: CNP-M-A080921-01 CenterPoint Energy Heat Advisory – Suspension of Disconnect for Non-Payment Orders

NOTICE DATE: August 9, 2021

NOTICE TYPE: CNP-M-A080921-01 - Initial

SHORT DESCRIPTION: National Weather Service Heat Advisory – CenterPoint Energy Suspension of Disconnect for Non-Pay Orders

INTENDED AUDIENCE: Retail Electric Providers

LONG DESCRIPTION: The National Weather Service has issued a Heat Advisory effective at 11:00 AM CDT Monday, August 9, 2021, for the CenterPoint Energy Service Territory, which requires the implementation of an Extreme Weather Moratorium on Disconnects beginning today. This Heat Advisory will be in effect until 7:00 PM CDT Monday, August 9, 2021.

The National Weather Service Heat Advisory underlying this DNP moratorium covers Austin, Brazoria, Chambers, Colorado, Fort Bend, Galveston, Harris, Liberty, Matagorda, Montgomery, Waller, and Wharton Counties. As noted in Sec. 7.6.5.4 of the ERCOT Retail Market Guide, it is CNP's practice to suspend DNPs across our entire territory when the National Weather Service issues a Heat Advisory for a county within our territory.

In accordance with PUC rules, DNP orders will not be executed during the DNP Moratorium for customers in the below counties.

| County Name | Effective Date of<br>DNP Moratorium | Last Date of DNP<br>Moratorium | Date DNP Orders<br>Resume |
|-------------|-------------------------------------|--------------------------------|---------------------------|
| Austin      | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Brazoria    | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Chambers    | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Colorado    | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Fort Bend   | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Galveston   | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Harris      | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Liberty     | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Matagorda   | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Montgomery  | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Waller      | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |
| Wharton     | 8/09/2021                           | 8/11/2021                      | 8/12/2021                 |

CenterPoint Energy's Process for Extreme Weather Moratoriums on Disconnects:

- Disconnect for Non-Payment (DNP) 650\_01 transactions that were previously submitted and are currently in our system will be Completed Unexecutable with a code of "V001" for any DNP with a "Date Wanted" that is within the Moratorium window.
- Same Day 650\_01 Disconnect for Non-Payment (DNP) transactions that are submitted during this Moratorium will be rejected with a "WTM" Reject Code
- Any 650\_01 DNP transactions received with a future requested "Date Wanted" will be accepted and scheduled. However, those DNPs may be subsequently Completed Unexecutable with a code of "VOD1" if the "Date Wanted" falls within this Moratorium window.

#### **Market Notice Final**



#### SUBJECT: CNP-M-A081121-02 CenterPoint Energy Heat Advisory – Suspension of Disconnect for Non-Payment Orders - Expired

NOTICE DATE: August 11, 2021

NOTICE TYPE: CNP-M-A081121-02 - Final

SHORT DESCRIPTION: National Weather Service Heat Advisory – CenterPoint Energy Suspension of Disconnect for Non-Pay Orders has EXPIRED

#### INTENDED AUDIENCE: Retail Electric Providers

LONG DESCRIPTION: The National Weather Service has issued a Heat Advisory effective at 8:00 AM CDT Wednesday, August 11, 2021, for the CenterPoint Energy Service Territory, which requires the implementation of an Extreme Weather Moratorium on Disconnects beginning today. This Heat Advisory has expired meaning that CenterPoint Energy will resume disconnects for non-pay based on the dates in the table below.

In accordance with PUC rules, DNP orders will not be executed during the DNP Moratorium for customers in the below counties.

| County Name | Effective Date of<br>DNP Moratorium | Last Date of DNP<br>Moratorium | Date DNP Orders<br>Resume |
|-------------|-------------------------------------|--------------------------------|---------------------------|
| Austin      | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Brazoria    | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Chambers    | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Colorado    | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Fort Bend   | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Galveston   | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Harris      | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Liberty     | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Matagorda   | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Montgomery  | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Waller      | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |
| Wharton     | 8/11/2021                           | 8/13/2021                      | 8/16/2021                 |

CenterPoint Energy's Process for Extreme Weather Moratoriums on Disconnects:

- Disconnect for Non-Payment (DNP) 650\_01 transactions that were previously submitted and are currently in our system will be Completed Unexecutable with a code of "V001" for any DNP with a "Date Wanted" that is within the Moratorium window.
- Same Day 650\_01 Disconnect for Non-Payment (DNP) transactions that are submitted during this Moratorium will be rejected with a "WTM" Reject Code
- Any 650\_01 DNP transactions received with a future requested "Date Wanted" will be accepted and scheduled. However, those DNPs may be subsequently Completed Unexecutable with a code of "VOOI" if the "Date Wanted" falls within this Moratorium window.

ADDITIONAL INFORMATION: This is the final Notice concerning this Heat Advisory.

**CONTACT:** If you have any questions regarding this notification, please send an email to <u>cr.support@centerpointenergy.com</u>

# **REP Actions To Assist**



- Market Partnership Monitor Weather Avoid Issuing DNPs that will have to be canceled
- Leverage technology to discontinue issuing 650\_01 disconnect for nonpayment orders during an active moratorium – 2 calendar day rule
- Shared Responsibilities During peak periods heavily monitor market notices
- Subscribe to ERCOT Listserv to assure timely receipt of weather moratorium market notices

# **REP Actions To Assist**

- Utilize CNP Competitive Retailers Website for market notice tracking
  - Competitive Retailers (centerpointenergy.com)
- Ensure CRIP access and password are current and working
  - Upcoming Enhancements
    - CRIP Banner for active weather moratoriums
    - Summary of canceled orders
    - Early warning market notice opportunities
- Reach out to your account manager with any questions

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### **Questions and Answers**



