

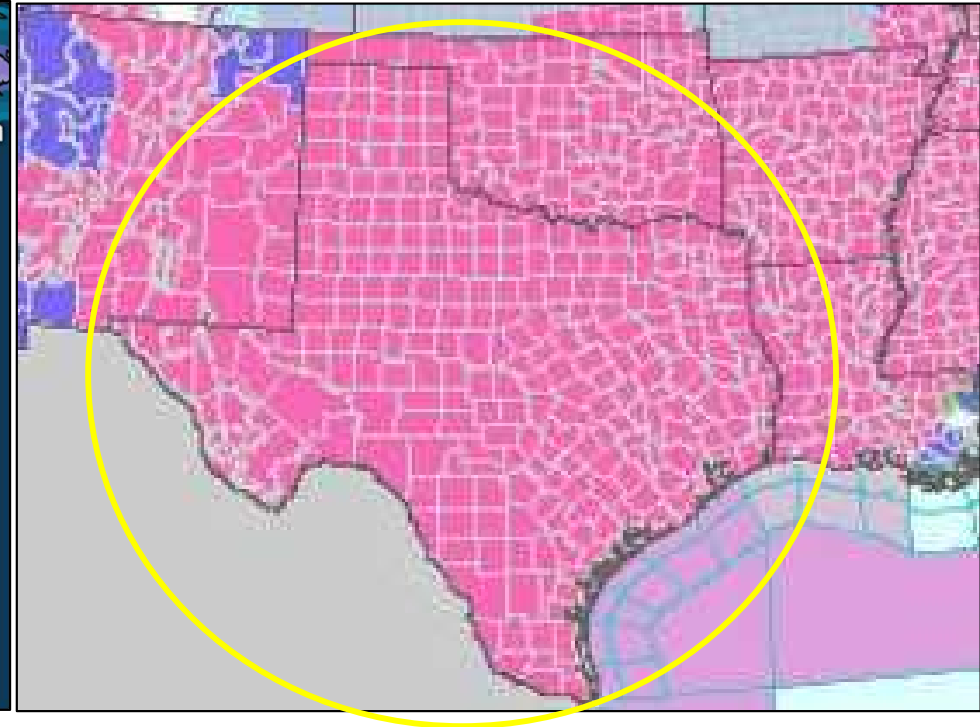
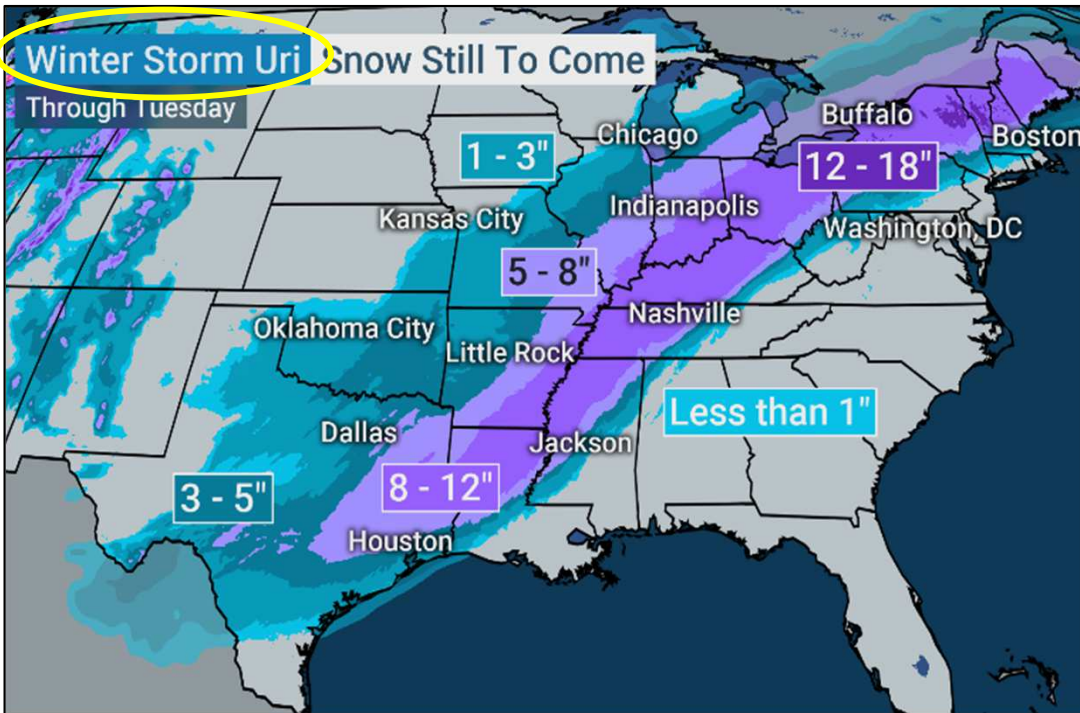


# Railroad Commission of Texas Critical Infrastructure Division

Texas Gas Association (TGA)  
November 17<sup>th</sup>, 2022



# Why a Critical Infrastructure Division?



Winter storm arrives – Texas freezes over – Electrical power unreliable

# Critical Infrastructure Division (CID)

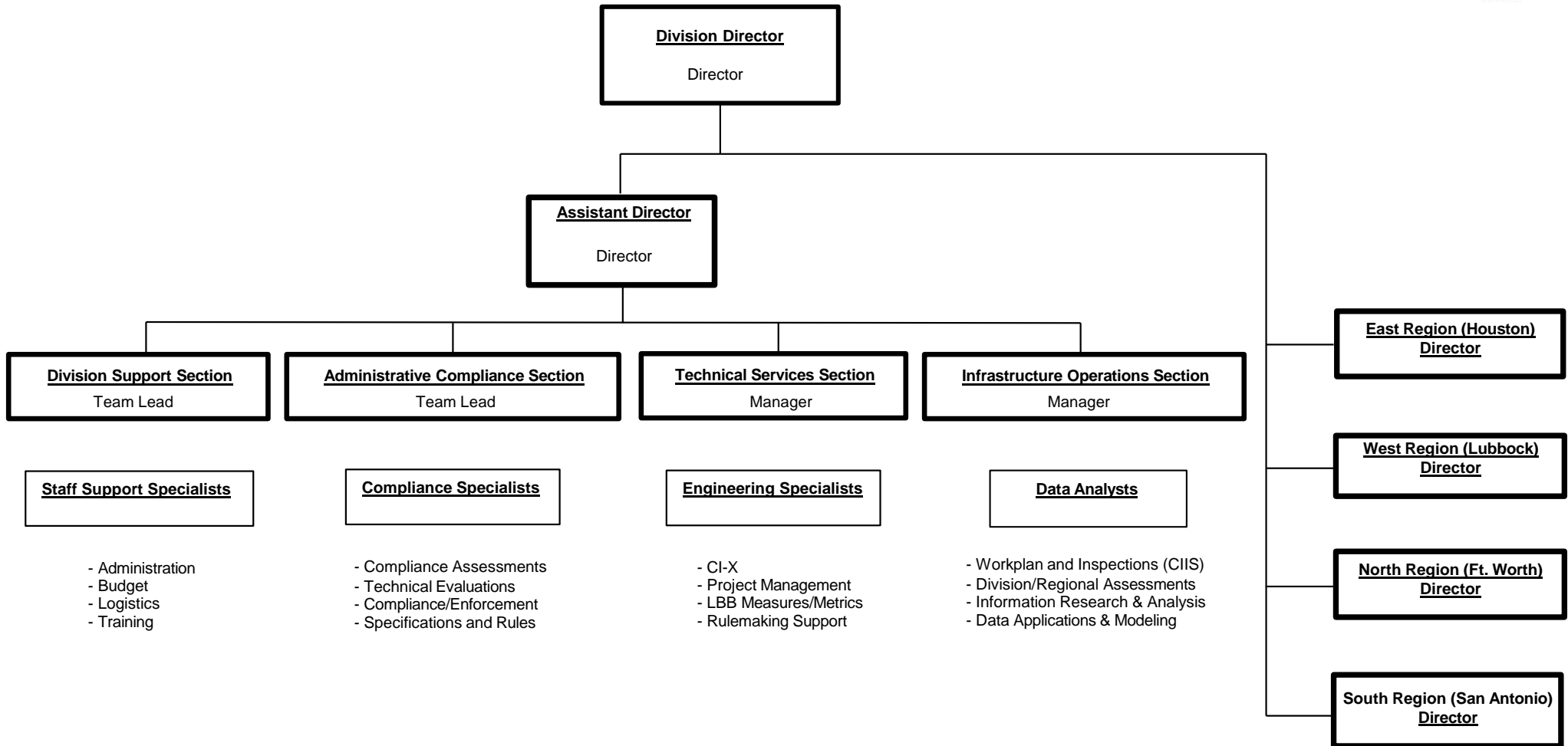


**Aim:** RRC's Critical Infrastructure Division (CID) is committed to serving the people of Texas with competence, consistency and credibility. We conduct our business using standards, processes and practices that achieve our statutory and regulatory requirements.

**Goal:** To complete annual inspections of natural gas critical infrastructure and manage administrative programs in accordance with Rule 3.65 and Rule 3.66. To provide critical infrastructure information in support of updates to the electrical supply chain map. To support any critical infrastructure information requirements during periods of state-declared energy emergencies.

**Method:** CID conducts inspections to ensure adherence to weatherization rules. The CID staff manages administrative compliance requirements for all stakeholders registering natural gas supply chain assets as critical infrastructure.

# Division Structure



# Division Locations (Regions)



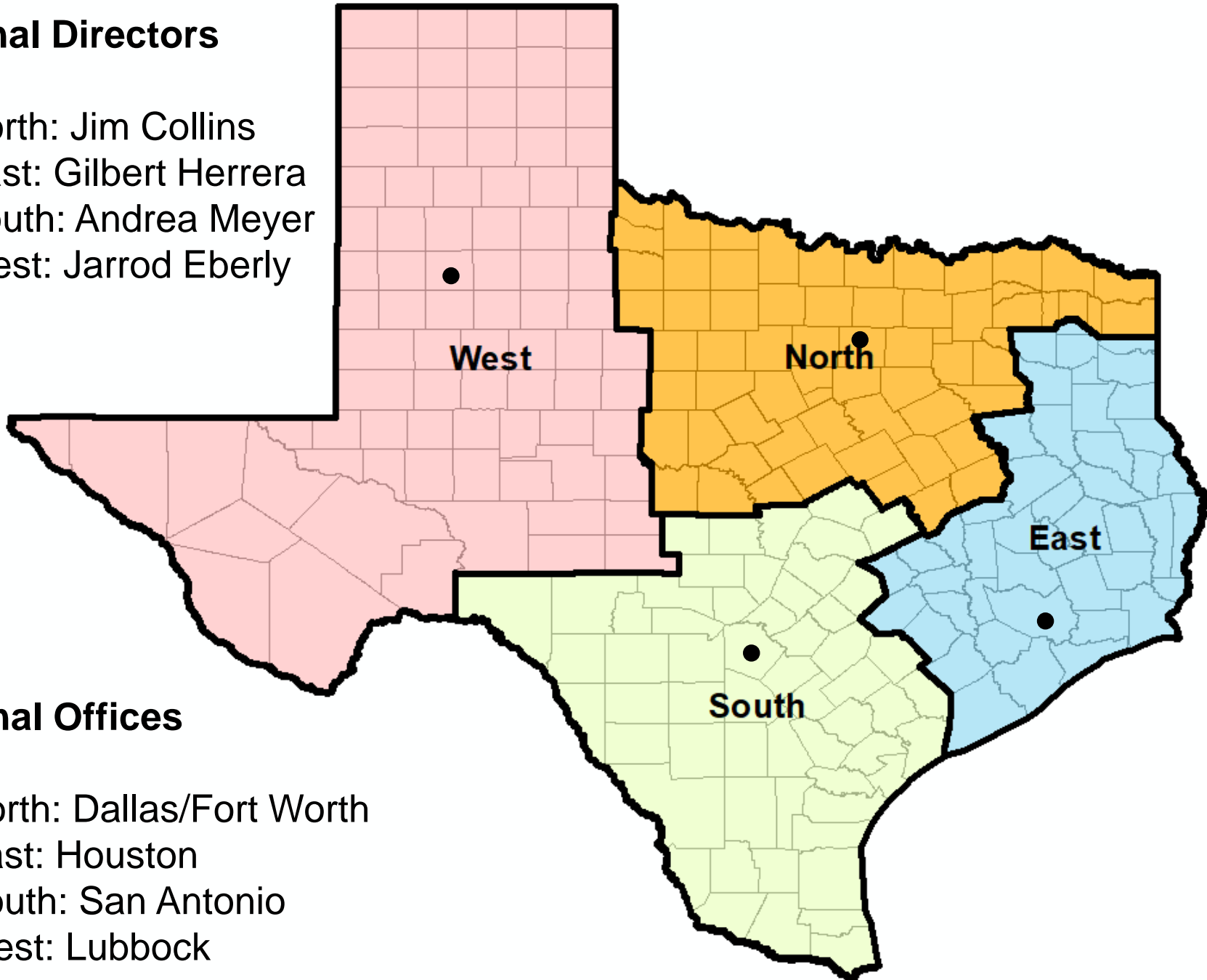
## Regional Directors

CID North: Jim Collins

CID East: Gilbert Herrera

CID South: Andrea Meyer

CID West: Jarrod Eberly



## Regional Offices

CID North: Dallas/Fort Worth

CID East: Houston

CID South: San Antonio

CID West: Lubbock

# What CID Does



- Rule 3.65 – Critical Infrastructure
  - CI-D and CI-X Filings
  - Administrative Compliance
  - Technical Assessments
- Rule 3.66 – Weather Preparedness
  - Emergency Operations Plans
  - Inspections
  - Technical Reviews

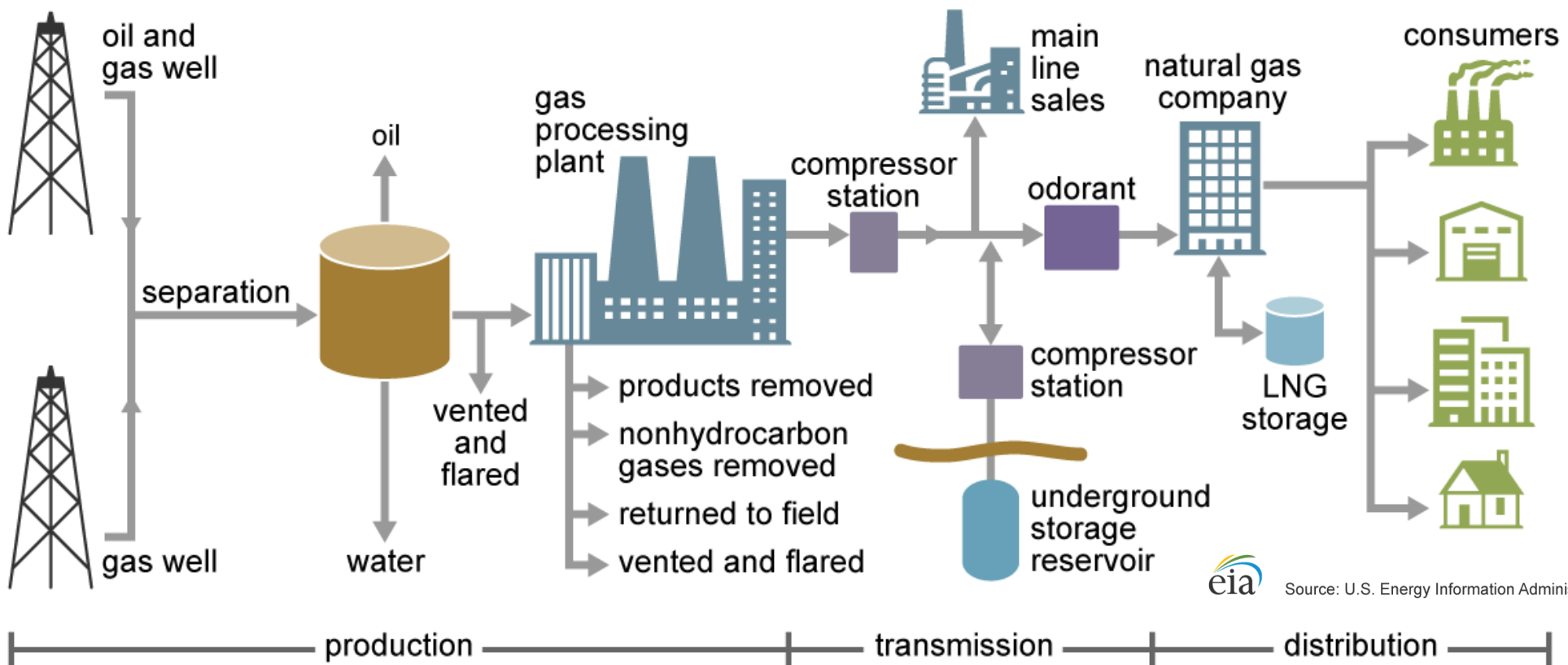
# How This Works Using the Rules



## Rule 3.65 (Critical Infrastructure)

*Categorize critical assets by function & determine their location*

### Natural gas production and delivery



## Rule 3.66 (Weather Preparedness)

*Weatherize critical assets on the electrical supply chain*

# Rule 3.66 - Overview



- Rule 3.66 applies to individual facilities
  - Gas Supply Chain Facilities; and
  - Gas Pipeline Facilities
- An operator under the RRC's jurisdiction may have only a portion of its total facilities subject to Rule 3.66
- By December 1 of each year, an operator of a facility must implement weather emergency preparation measures intended to:
  1. Ensure sustained operations during a weather emergency; and
  2. Correct weather-related forced stoppages that prevented sustained operation due to previous weather emergencies



# Rule 3.66



## **Gas Supply Chain Facility**

1. Included on the Electricity Supply Chain Map;  
and
2. Designated as critical in Rule 3.65 (relating to *Critical Designation of Natural Gas Infrastructure*)

## **Gas Pipeline Facility**

1. Directly serves a natural gas electric generation facility operating solely to provide power to the electric grid for the Electric Reliability Council of Texas (ERCOT) power region or for the ERCOT power region and an adjacent power region;  
and
2. Included on the Electricity Supply Chain Map

# Sustained Operations



- Safe operation of a gas pipeline facility or a gas supply chain facility such that the facility does not experience a major weather-related forced stoppage or weather-related forced stoppage in production, treating, processing, storage, or transportation of natural gas.

# Weather Emergency



- Weather conditions such as freezing temperatures, freezing precipitation, or extreme heat in the facility's county or counties that result in an energy emergency as defined by §3.65
- A weather emergency does not include weather conditions that cannot be reasonably mitigated such as tornadoes, floods, or hurricanes

# Weather Related Force Stoppage

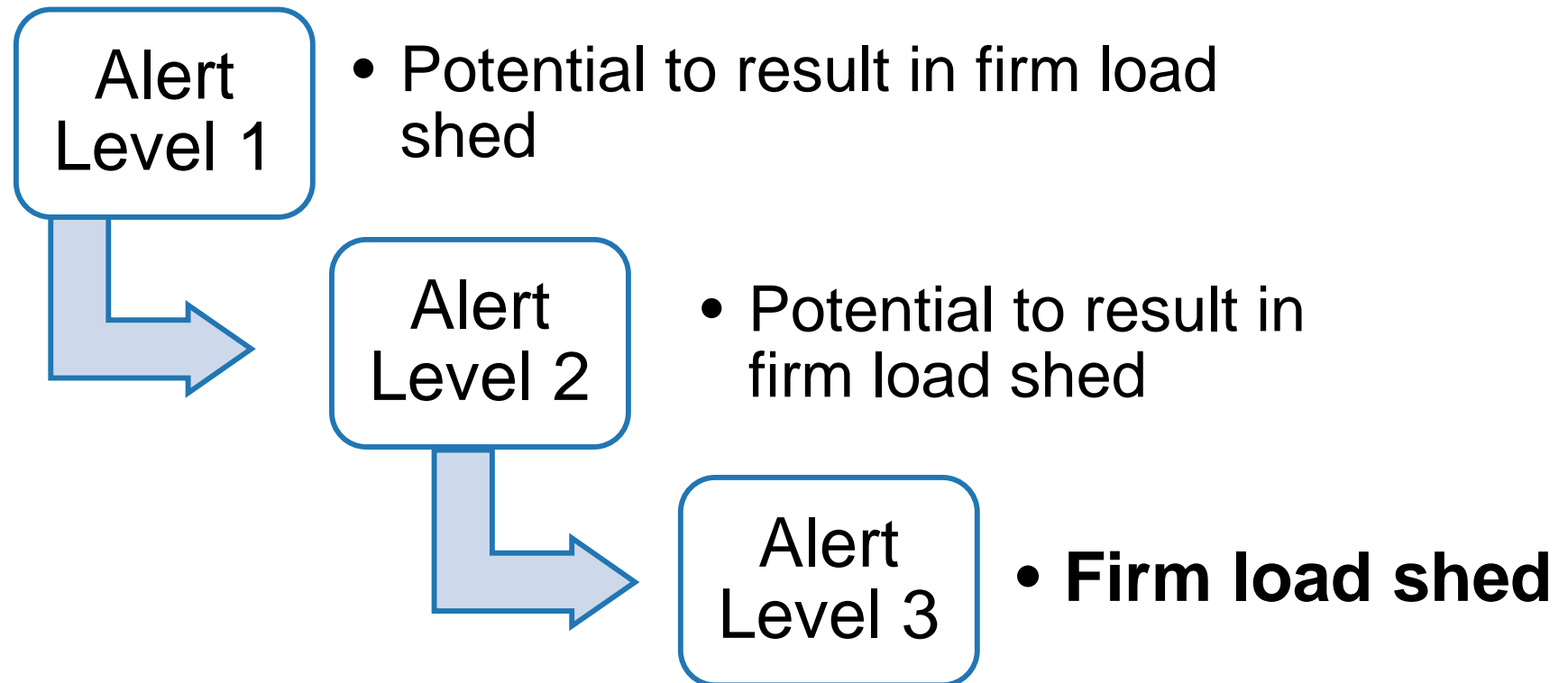


- An unanticipated and/or unplanned outage in the production, treating, processing, storage, or transportation of natural gas that is caused by weather conditions such as freezing temperatures, freezing precipitation, or extreme heat and occurs during a weather emergency

# Energy Emergency



Energy Emergency – ERCOT has issued an EEA 1 or higher



# When to Take Action



## Weather-related forced stoppage

- Notify the RRC using the Critical Infrastructure Division's notification online portal (RRC Online CID system account) if the stoppage is not resolved within 24 hours of discovery.

## Major weather-related forced stoppage

- Call the Critical Infrastructure Division's 24-hour emergency line to notify the RRC of the stoppage **within one hour** of discovery of the stoppage.
- Then, submit online in the Critical Infrastructure Division's notification portal. (RRC Online CID system account)

**Important:** You must return to complete the report once the outage has been resolved.

# CID Inspections



- A regular **inspection** of the **facility** conducted in accordance with RRC's inspection schedule. The types of inspections are:
  - Inspections for preparedness based on Attestation
  - Weather Related-Forced Stoppages inspections
- An **investigation** may be required in response to a weather-related forced stoppage based in the inspection results.
- If a **gas supply chain facility** or **gas pipeline facility** experiences repeated weather-related forced stoppages or major weather-related forced stoppages, upon notice from the Commission, the operator shall contract with a person with related experience to assess the facility's weather emergency preparation measures, plans, procedures, and operations.

# Inspection Schedule



Before  
Dec 1

- Scheduled Visits
- Site Verifications

After  
Dec 1

- Readiness Attestation
- Inspect facilities based on attestation

During  
weather  
emergency

- Notification of forced weather-related stoppage
- Inspection from notification





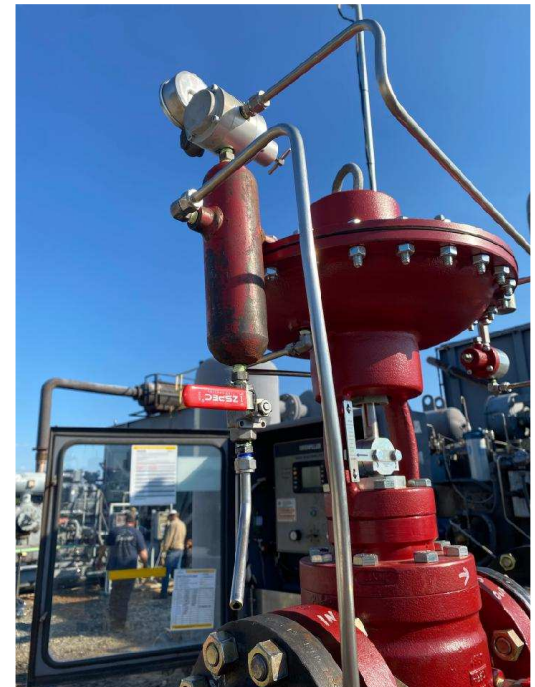
- Preparation Measures
  - **Weatherization** using methods a *reasonably prudent* operator would take given
    - the type of facility,
    - the age of the facility,
    - the facility's critical components,
    - the facility's location, and
    - weather data for the facility's county or counties such as data developed for the Commission by the state climatologist

# Weatherization of Critical Components



Common weatherization methods (visual inspection):

- Methanol injection/drip
- Water removal – solid absorption
- Thermal insulation
- Wind breaks
- Heating devices
- Glycol unit
- Drip pots



# Enforcement



- Gas Supply Chain Facilities
  - RRC will pursue administrative violations of the rule for adjudication only
  - After an order finding a violation of Rule 3.66 has been entered by RRC, RRC will refer violation to the Office of the Attorney General
  - Office of Attorney General will file suit for collection of penalties utilizing Rule 3.66's penalty classification table
- Gas Pipeline Facilities
  - RRC has administrative penalty authority
  - RRC will adjudicate alleged violations
  - If violation order is issued, RRC will collect penalties utilizing Rule 3.66's penalty classification table

# Critical Infrastructure Inspection System



The screenshot shows the user interface of the Critical Infrastructure Inspection System. At the top, there is a search bar and navigation tabs for "Accounts", "SP GAS PIPELINE CO...", "Airgas", and "Chevron". The main content area is titled "Account Chevron" and includes a header with "Merge", "Transfer", and "Generate Document" options. Below this, there is a summary row with fields for "Account Record Type" (Organization), "Business Area" (Oil and Gas), "P5 Number", "Phone", "Mailing Address" (6001 Bollinger Canyon), and "Meets Critical Infrastructure" (checkbox). The "Details" section is divided into two columns of fields. The left column includes "Account Name" (Chevron), "Business Area" (Oil and Gas), "Organization ID" (4984951), "Region List", "T4 Permit List", "P5 Number" (5877), "Active Hold" (checkbox), "Organization Type" (Corporation), "Region", "Jurisdictional Control Room" (checkbox), and "Known Hazards". The right column includes "Account Record Type" (Organization), "Mailing Address" (6001 Bollinger Canyon Rd, San Ramon, California 94583, United States) with an embedded map, "County", "District", "Region ID", "Account Site", "Account Owner", "Primary Emergency Representative", "Secondary Emergency Representative", and "Emergency Phone". A right-hand sidebar contains several expandable sections: "Notifications (PS-95 Org...)", "Notifications (SRC/IMP) ...", "Contacts (1)", "Contacts (Represented ...)", "Remarks/Comments (0)", and "Units (for this Organizat...)". The "Contacts (1)" section is expanded, showing fields for "Title", "Contact Type", and "Email" (@gmail.com).

Sets the baseline for the inspection universe

Based on CI-D data, map information and other RRC databases

# CID Milestones



Emergency Operations Plan (EOP Letters) issued May 2022

RRC weatherization rule (3.66) adopted on August 30<sup>th</sup>, 2022

CI-D/CI-X submission deadline closed September 1, 2022

RRC files the first emergency operations report with the Texas Legislature on September 30<sup>th</sup>, 2022

RRC Rule 3.65 amended with effective date November 21, 2022

Preparation for the Winter 2022-2023 season:

- Site verification project in mid-September 2022
- Inspector training events from September to November 2022
- Outreach efforts to stakeholders in October 2022
- CIIS Implementation no later than November 1<sup>st</sup>, 2022
- Operator Attestations on December 1<sup>st</sup>, 2022

# How CID Operates



- **Consistent, Competent and Credible (C3)**
  - Accountability matters at every level
- **Inspect and Protect (I&P)**
  - A minimum of 7000 inspections each year
- **Data Driven Decisions (D3)**
  - Right-sized regulation with no mission creep
- **Be bold, be brief, and be gone (3Bs)**
  - Tailored approach to communications & inspections

# Helpful Links – Key Documents



Website:

<https://www.rrc.texas.gov/critical-infrastructure/>

Home

## Critical Infrastructure

Regulating the weatherization of natural gas facilities.

Critical Infrastructure Forms

TAC Rule 3.65

Training

Notices To Operators

Critical Infrastructure Regions Map

### CONTACT INFORMATION

Critical Infrastructure Phone: 512-463-6737

General Email: [CID@rrc.texas.gov](mailto:CID@rrc.texas.gov)

### HELPFUL LINKS

Critical Infrastructure Forms

Form CI-D Online Filing Instructions

Form CI-X Online Filing Instructions

FAQ on Filing CI Forms

Search and Download Electric Entity Directory

Weatherization Practices Guidance Document

Report Road Condition Issues




### CRITICAL INFRASTRUCTURE ANNOUNCEMENTS


**Notice to Oil & Gas and Pipeline Operators: Weather Emergency Preparedness Standards**

September 19, 2022

On August 30, 2022, the Railroad Commission of Texas (RRC) adopted 16 Texas Administrative Code (TAC) §3.66, relating to Weather Emergency Preparedness Standards. The new rule implements changes made by Senate Bill 3, the 87th Legislature's sweeping response to the February 2021 Winter...

[VIEW OUR ANNOUNCEMENTS](#)

 RAILROAD COMMISSION OF TEXAS	Weatherization Practices Guidance Document	Gas Supply Chain Facilities and Gas Pipeline Facilities
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**RAILROAD COMMISSION OF TEXAS**

RRC Weatherization Practices Guidance Document – Gas Supply Chain Facilities and Pipeline Facilities

# CID Resources



Website:

<https://www.rrc.texas.gov/critical-infrastructure/>

The screenshot shows the top portion of the Critical Infrastructure website. It features a dark blue header with the text "Critical Infrastructure" and a sub-header "Regulating the weatherization of natural gas facilities." Below the header is a navigation menu with links for Home, About Us, Resources, Forms, Events, Compliance, Accounts, and Contact Us. A search bar is located in the top right corner. On the left side, there is a "Contact Information" section with the phone number 512-463-6737 and email OD@rrc.texas.gov. A "Helpful Links" section lists various forms and documents such as "Critical Infrastructure Forms", "Form CD-03 Online Filing Instructions", and "Form CD-04 Online Filing Instructions". On the right side, there is a red banner for "Critical Infrastructure Forms" and a section for "Critical Infrastructure Publications" with a link to "Critical Infrastructure Publications Page".

**Critical Infrastructure Division**  
Regulating the weatherization of natural gas facilities.

**RRC's Critical Infrastructure Division (CID)** is committed to serving the people of Texas by ensuring the natural gas industry consistently incorporates weatherization and reliability standards and practices to achieve uninterrupted natural gas production throughout the year especially during periods of energy emergencies in the state.

### CORE RESPONSIBILITIES

The CID manages people, programs and processes in accordance with 16 TAC Rule 3.65 and 16 TAC Rule 3.66 to ensure weatherization preparedness of critical infrastructure on the natural gas supply chain.

Division and regional staff carry out multiple activities that include administrative compliance, site inspections, outreach initiatives and technical reviews.

### COMPLIANCE ACTIVITIES

- Form CD-0, Acknowledgement of Critical Customer/ Critical Gas Supplier Designation, and its attachment, will be submitted by an operator acknowledging that its facilities are designated as critical by the new rule.
- Form CD-X, Critical Designation Exception Application, and its attachment, would be submitted by an operator applying for an exception because the facility is not prepared to operate in a weather emergency.

### INSPECTION ACTIVITIES

- Conduct inspections of natural gas critical infrastructure throughout the State of Texas in accordance with weatherization preparedness rules and requirements.

### OUTREACH ACTIVITIES

- Conduct conferences, meetings, webinars, and webinars with operators, associations and stakeholders in the natural gas industry. Provide information and training on weatherization preparedness, and address issues relating to RRC rules 3.65 & 3.66.

### TECHNICAL ACTIVITIES

- Review emergency operations plans for completeness and preparedness in accordance with Rule 3.66.

**Contact Information**  
Critical Infrastructure:  
512-463-6737  
General email:  
OD@rrc.texas.gov  
<https://www.rrc.texas.gov/critical-infrastructure>

### REGULATORY

**REGULATORY**

RRC's Critical Infrastructure Division (CID) is committed to serving the people of Texas by ensuring the natural gas industry consistently incorporates weatherization and reliability standards and practices to achieve uninterrupted natural gas production throughout the year especially during periods of energy emergencies in the state.

The CID will regularly assess and manage adherence to weatherization rules adopted by the RRC, including ensuring compliance with the natural gas supply chain preparedness rules as Critical Infrastructure.

On November 02, 2022, The Railroad Commission of Texas commissioners adopted rules for critical designation of natural gas infrastructure to help address Texas' energy emergencies. The new rules implement provisions in rules 3.65 and 3.66 and define natural gas facilities that must be designated as critical gas suppliers and critical customers.

Critical gas supplier rules will set forth the rules of base that produce gas, receive gas pipeline facilities, underground storage gas storage facilities and additional storage facilities.

### TRAINING

**TRAINING**

Critical Infrastructure Forms  
16 TAC Rule 3.65  
Training  
Forms to Operators  
Critical Infrastructure Publications Page

**Critical Infrastructure Publications Page**

Critical Infrastructure Publications Page  
**Notice to Gas Supply Chain & Gas Pipeline Facilities Operators: Weather Emergency Readiness Attention Online Filing Available**

November 16, 2022  
In accordance with Texas Administrative Code (TAC) §§ 16.04, relating to weather emergency preparedness standards, operators of gas supply chain facilities designated as critical under 16 TAC §§ 16.04 and included in the weather supply chain may be required to file a weather emergency readiness attention with the Railroad Commission of Texas (RRC) by December 31st each year. Operators of gas pipeline facilities that directly serve a critical gas supplier generator facility operating under a permit to the weather grid for the Electric Reliability Council of Texas (ERCOT) power region or for the ERCOT power region and an adjacent power region and/or are included in the weather supply chain...

[View All Publications](#)



# CID Contacts



## Headquarters (Austin)

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Andrea Meyer 210-227-1313

[andrea.meyer@rrc.texas.gov](mailto:andrea.meyer@rrc.texas.gov)

## Staff

Critical Infrastructure Division Telephone: 512-463-6737

General Email: [CID@rrc.texas.gov](mailto:CID@rrc.texas.gov)

# Critical Infrastructure Division

## WHAT WE ARE:

- CONSISTENT
- COMPETENT
- CREDIBLE

## WHAT WE DO:

- CARE
- CONNECT
- COMMUNICATE

