

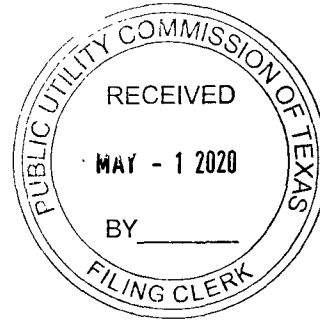


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Project No. 39339
In Accordance With 16 Tex. Admin Code §25.95

Entergy Texas, Inc.
Storm Hardening Plan Summary
Calendar Years 2016-2020

May 1, 2020

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In compliance with 16 Tex. Admin Code (“TAC”) §25.95, Entergy Texas, Inc. (“ETI”) files its material revisions to its 2016 – 2020 Storm Hardening Plan (noted as a) throughout the document) and a summary of its progress implementing the Plan (noted as b) throughout the document).

ETI’s storm hardening strategies are based on the Entergy Hurricane Hardening Study completed in 2007 on behalf of ETI and the other Entergy operating companies, which was filed at the Public Utility Commission of Texas under Project No. 32182 on December 18, 2007. This summary includes ETI’s 2016 - 2020 storm hardening plans and strategies and follows the outline of the rule.

- I. Construction standards, policies, procedures, and practices employed to enhance the reliability of utility systems, including overhead and underground transmission and distribution facilities;
 - a. No material revisions to the Transmission plan since ETI’s May 2019 report. Beginning in October 2018, Distribution Standards were revised to install minimum class 1 or larger poles for backbone feeders south of IH-10.
 - b. No implementation required
- II. Vegetation Management Plan for distribution facilities, including a tree pruning methodology and pruning cycle, hazard tree identification and mitigation plans, and customer education and notification practices related to vegetation management;
 - a. ETI’s compliance with 16 TAC §25.96 (filed in Project No. 41381) fully satisfies the vegetation management planning and reporting requirements of 16 TAC §25.95(e)(2).
- III. Plans and procedures to consider infrastructure improvements for its distribution system based on smart grid concepts that provide enhanced outage resilience, faster outage restoration, and/or grid self-healing;
 - a. No material revisions to plan since ETI’s May 2019 report.
 - b. ETI and other Entergy operating companies continued installing the communications network infrastructure to support AMI and Distribution Automation / Smart Grid in 2019. ETI installed 185,963 smart meters in 2019. In 2019, 42 new reclosers were installed on various distribution feeders in Texas.
- IV. Plans and procedures to enhance post storm damage assessment, including enhanced data collection methods for damaged poles and fallen trees;
 - a. ETI has adopted EpochField as its data collection tool to be implemented in 2020 for damage assessments during routine storms. An upgrade to the software is expected in November 2021, at which time it will be used for major storms as well. This tool utilizes Wi-Fi for real-time updates as assessments are being made for faster analysis and reporting.

- b. Implementation as discussed above.
- V. Transmission and distribution pole construction standards, pole attachment policies, and pole testing schedule;
 - a. No material revisions to the Transmission plan since ETI's May 2019 report. Beginning in October 2018, Distribution Standards were revised to install minimum class 1 or larger poles for backbone feeders south of IH-10.
 - b. For distribution pole inspections completed in 2019, see ETI's Infrastructure Improvement and Maintenance 2019 Calendar Year Report filing in Project No. 38068 in accordance with 16 TAC §25.94
- VI. Distribution feeder inspection schedule;
 - a. No material revisions to plan since ETI's May 2019 report.
 - b. For distribution pole inspections completed in 2019, see ETI's Infrastructure Improvement and Maintenance 2019 Calendar Year Report filing in Project No. 38068 in accordance with 16 TAC §25.94.
- VII. Plans and procedures to enhance the reliability of overhead and underground transmission and distribution facilities through the use of transmission and distribution automation;
 - a. No material revisions to the Transmission plan since ETI's May 2019 report. For Distribution response, see Section III above.
 - b. In 2019, Transmission added seven Distance to Fault links to SCADA on transmission lines. Implementation of sixteen transmission line auto-sectionalizing projects are underway for completion in 2020. Additional analysis is underway to determine 2021-2023 plans. For Distribution response, see section III above.
- VIII. Plans and procedures to comply with the most recent National Electric Safety Code ("NESC") wind loading standards in hurricane prone areas for new construction and rebuilds of the transmission and distribution system
 - a. No material revisions to plan since ETI's May 2019 report.
- IX. Plans and procedures to review new construction and rebuilds to the distribution system to determine whether they should be built to NESC Grade B (or equivalent) standards;
 - a. No material revisions to plan since ETI's May 2019 report.
 - b. Implementation ongoing.
- X. Plans and procedures to develop a damage/outage prediction model for the transmission and distribution system;
 - a. No material revisions to plan since ETI's May 2019 report.
 - b. Implementation complete with annual evaluation and enhancements as appropriate.

- XI. Plans and procedures for use of structures owned by other entities in the provision of distribution service, such as poles owned by telecommunications utilities;
 - a. No additional material revisions to plan since ETI's May 2019 report.
 - b. Implementation completed in 2011.

- XII. Plans and procedures for restoration of service to priority loads and for consideration of targeted storm hardening of infrastructure used to serve priority loads.
 - a. No material revisions to the plan since ETI's May 2019 report. ETI has identified its priority loads and maintains such designation of these customers in its database systems such that their specific feeder location is identifiable. These priority loads are included in ETI's storm restoration plans and are taken into consideration during restoration of service after an event. These priority loads are served by approximately 86% of ETI's distribution substations and approximately 62% of ETI's distribution feeders. Given this widespread dispersion of these priority loads, targeted hardening is not a viable option. In other words, a significant rebuild of ETI's facilities would be required. Instead, ETI's storm hardening strategies discussed in Section I will continue to be pursued.
 - b. Annually review the percentage of distribution substations and feeders that serve the priority loads.