

**BEFORE THE**  
**LOUISIANA PUBLIC SERVICE COMMISSION**

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*In re: February 2021 Winter Storm Event.*

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**NORTHEAST LOUISIANA POWER COOPERATIVE, INC.’S**  
**RESPONSES TO FOLLOW-UP QUESTIONS TO**  
**ELECTRIC UTILITIES ON WINTER STORM EVENT**

NOW COMES, through undersigned counsel, Northeast Louisiana Power Cooperative, Inc. (“NELPCO”), in response to the Follow-Up Questions regarding the winter storms that occurred the week of February 15, 2021 (hereinafter “Winter Storms”) received from the Louisiana Public Service Commission (“LPSC” or “Commission”), and respectfully responds as follows:

*Questions for All Electric Utilities*

**Questions pertaining to the Distribution Grid:**

1. How many MW of generation were offline or otherwise subject to unplanned outages during the Winter Storms?

**NELPCO’s Response:**

N/A. NELPCO is a distribution cooperative and, as such, does not possess generating assets.

2. What were all identified causes of storm related outages for generation during the Winter Storms for your system? Please also indicate what was the main contributing factor.

**NELPCO’s Response:**

N/A. NELPCO is a distribution cooperative and, as such, does not possess generating assets.

3. How many miles of distribution and transmission lines do you own and manage in Louisiana? Please separate your response by distribution and transmission.

**NELPCO's Response:**

NELPCO owns 2,677 total miles of distribution and 34 total miles of transmission lines.

4. Did any part of your bulk transmission system suffer unplanned outages as a result of the Winter Storm? Please include the following in your response:

- a. The length of lines affected;
- b. The specific cause of the outage;
- c. The time span each line was offline;
- d. The expected return to full service time and date; and/or
- e. The actual return to service of these lines.

**NELPCO's Response:**

No.

- a. N/A. NELPCO did not experience unplanned transmission line outages during the Winter Storm.
- b. See response to a., above.
- c. See response to a., above.
- d. See response to a., above.
- e. See response to a., above.

5. Was any of the utility's bulk transmission system or generating units offline due to planned maintenance when the Winter Storm event was declared? If yes, please provide:

- a. The name of the transmission system and/or generating unit(s);
- b. The size (KV) and length of the transmission lines, if applicable;

- c. Why such maintenance was scheduled in February 2021 as opposed to another time period.

**NELPCO's Response:**

No.

- a. N/A. NELPCO does not own generating assets and did not have any planned transmission line outages during the Winter Storm.
- b. See response to a., above.
- c. See response to a., above.

6. What was the average restoration time for power outages due to storm damage from the Winter Storms?

**NELPCO's Response:**

NELPCO's average restoration time for power outages due to storm damage from the Winter Storms was four (4) days.

7. How heavily do you rely on contracted crews (compared to your own linemen) to restore power during normal<sup>1</sup> outages?

**NELPCO's Response:**

NELPCO does not rely on contracted crews to restore power during normal (as defined) outages.

8. How heavily did you rely on contracted crews (compared to your own linemen) to restore power during the Winter Storms?

**NELPCO's Response:**

NELPCO relied roughly 50% on contracted crews to assist with restoration efforts during the Winter Storms.

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<sup>1</sup> Normal outages would be non-emergency events, whereas emergency events are hurricanes or a scenario like the Winter Storms.

9. Could any of those outages be prevented with different preparation or enhanced vegetation maintenance prior to the Winter Storms?

- a. If outages were caused by fallen or sagging tree limbs, could those outages have been prevented with better vegetation maintenance by your company?
- b. Please provide all locations within your service area that were included within your vegetation maintenance schedule over the past two years (2019-2020) and the first 2 months of 2021.
- c. Please provide the locations in your service area that received the most scheduled vegetation maintenance within the two years (2019-2020) and the first 2 months of 2021.
- d. Please provide the locations in your service area that received the least scheduled vegetation maintenance within the past two years (2019-2020) and the first 2 months of 2021.
- e. Please provide the locations with the most distribution grid damage due to fallen or sagging trees or tree limbs during the Winter Storms.
  - i. If possible, please explain how many customers lost power due to the vegetation damage in these locations?

**NELPCO's Response:**

- a. The Winter Storms were an unprecedented event in NELPCO's service territory. The Winter Storms were much more severe than past ice and winter storms that NELPCO has experienced. NELPCO plans its vegetation management according to anticipated needs that are largely based on past experience. It is virtually impossible to determine whether outages during the Winter Storms caused by fallen or sagging tree limbs could have been prevented by "better vegetation maintenance" on NELPCO's part, as the phrase "better vegetation maintenance" is not defined. Vegetation management must be planned and executed in a cost-effective manner. NELPCO believes that its vegetation management plan and efforts are prudent and reasonable. That said, NELPCO is reviewing its vegetation management plans to determine whether improvements can be made.
- b. NELPCO provided as needed vegetation management throughout its service territory during the period 2019-2020 and the first two months of 2021
- c. See response to subpart b.
- d. See response to subpart b.

e. NELPCO does not have a record of the precise locations of line damage due to fallen or sagging trees / tree limbs caused by the Winter Storms.

i. N/A. See response to subpart e.

10. How much of your total operating budget is dedicated to vegetation maintenance in Louisiana? Please provide both a percent of total budget and dollar amount.

**NELPCO's Response:**

NELPCO does not have a line item in its budget for vegetation management, per se, but, rather, vegetation management is included in NELPCO's overall budget.

11. Please provide a narrative explanation of the "winterization" procedures and protocols utilized by the utility for each of its generating facilities and verification that those procedures and protocols were followed.

a. Please indicate whether there are any winterization procedures that were not performed on any of the utility's generating units for this winter season and why such procedures were not performed.

**NELPCO's Response:**

N/A. NELPCO does not own or operate generating assets.

a. N/A.

**Questions Pertaining to Rolling Blackouts:**

12. Please describe the procedures used by the RTOs and by you to determine which load should be shed and for what duration.

**NELPCO's Response:**

MISO employs procedures for load shed. NELPCO directs the Commission to MISO for a complete description of its load shed procedures. NELPCO designated its Log Cabin substation for "load shed" prior to 2012.

13. Did your utility undergo in [sic] any mandated or self-imposed rolling blackouts?

- a. If you did execute rolling blackouts, how much time lead time did you receive from when you knew a blackout would occur to when the blackout took place for the end user? Please include a timeline of all notices received from MISO or SPP (as applicable) regarding the necessity to begin load shedding.
  - i. In that time, were the effected customers notified in preparation?
  - ii. Were the effected customers notified during or after the rolling blackout?
  - iii. If effected customers were notified of a rolling blackout, what mode of communication was used?
  - iv. If effected customers were notified before or during, were they given a timeline of how long the blackout would occur? Was that timeline accurate?
- b. If the blackout was mandated, who made that decision and was a recommended time period given for how long the blackouts needed / should last?
- c. If you did execute rolling blackouts, how long did the blackouts last? Please provide a shortest, longest, and average time of the rolling blackouts.
- d. Please indicate the amount of industrial, commercial and/or residential load tripped off/shed during the Winter Storms, including the number of customers in each class and the number of MW by region and/or location.
- e. If you did execute rolling blackouts, were you able to target those blackouts in order to:
  - i. Lessen the impact on vulnerable customers, such as, but not limited to, those needed electricity for health reasons or those customers who were just getting their power back after multiple days?
    1. If not, is there something different that can be done in the future to potentially achieve this?
  - ii. Ensure the most power was conserved during a rolling black while potentially affecting the least customers? For instance, were you able to conserve energy by shutting off closed commercial customers and therefore spare shutting off residential customers trying to stay warm in their home?
    2. If not, is there something different that can be done in the future to potentially achieve this?

**NELPCO's Response:**

Yes.

- a. NELPCO received a call (from MISO???) around 4:00 p.m. on February 15, 2021 and February 16, 2021 regarding a "Max Gen" alert, but did not receive any call or other alert at 6:56:24 p.m. which is when the blackout began.
  - i. No. NELPCO was not certain a rolling blackout would occur and, as mentioned in response to subpart a., above, only received notice from MISO of a "Max Gen" alert which did not cause any effects until almost two hours later.
  - ii. When NELPCO customers contacted it regarding outages, NELPCO informed them of the rolling blackout.
  - iii. See response to sub-subpart ii., above.
  - iv. NELPCO was not able to provide a timeline to its customers regarding how long the rolling blackout would last as the blackout was beyond NELPCO's control.
- b. LaGen (Cleco Cajun, LLC) made the decision regarding the rolling blackout. LaGen estimated the blackout would last approximately one (1) hour.
- c. N/A. NELPCO did not cause any rolling blackouts to occur.
- d. Approximately 13.2 MW of load tripped during the Winter Storms on February 16, 2021, which was primarily residential load.
- e. N/A. NELPCO did not cause any rolling blackouts to occur.
  - i. N/A. NELPCO did not cause any rolling blackouts to occur.
    - 1. N/A. NELPCO did not cause any rolling blackouts to occur.
  - ii. N/A. NELPCO did not cause any rolling blackouts to occur.
    - 2. N/A. NELPCO did not cause any rolling blackouts to occur.

14. How many of your meters were turned off intentionally due to rolling blackouts versus lost power naturally due to storm damage from the Winter Storms?

**NELPCO's Response:**

None.

15. Were any Load Modifying Resources ("LMRs"), including interruptible load, utilized during the Winter Storms?

- a. If yes, please provide:
  - i. The type of LMR;
  - ii. The total number of MW of LMR;
  - iii. The duration of their use.
- b. If no, please provide identify any interruptible customers who were not interrupted during the Winter Storm and provide a narrative as to why they were not interrupted. Included with this response, please also identify any interruptible load that did not fulfill its obligation to interrupt load when called.

**NELPCO's Response:**

N/A. NELPCO does not have LMR on its system.

**Questions Pertaining to Fuel and Generation Needs throughout the Winter Storms:**

16. Please describe the impact of the Winter Storms on fuel costs and the expected impact on upcoming utility bills.

**NELPCO's Response:**

N/A. NELPCO does not incur fuel costs directly as it purchases all of its power supply from LaGen.

17. Please describe any factors that limited the ability to import fuel to serve load and quantify the level of imports that were limited.

**NELPCO's Response:**

N/A. NELPCO does not import fuel as it purchases all of its power supply from LaGen.

18. Please indicate whether there were any fuel suppliers who failed or refused to deliver the contracted quantities of fuel during the Winter Storms. If there were any failures or refusal of delivery, please indicate:

- a. The name of the fuel supplier;
- b. The amount of fuel that was not delivered;
- c. The generating unit(s) to which fuel was not delivered;
- d. The reason provided by the fuel counterparty for failure to deliver; and
- e. Whether or not that generating unit had to cease or curtail operations as a result of the failure of the fuel supplier to deliver contracted-for quantities.

**NELPCO's Response:**

N/A. NELPCO does not possess information regarding whether any fuel suppliers failed or refused to deliver the contracted quantities of fuel during the Winter Storms as it purchases all of its power supply from LaGen.

19. What are your suggestions on how to spread the fuel costs through the Fuel Adjustment Clause ("FAC") such that these costs are not incurred on a single bill?

**NELPCO's Response:**

N/A. NELPCO does not utilize a Fuel Adjustment Clause.

20. What are your suggestions on other ways to share the risk of such effects to the FAC rather than flowing those costs through to customer bills?

**NELPCO's Response:**

N/A. See the response to RFI No. 19, above.

21. How much did the price of fuel go up during the Winter Storms and for how long did it stay at those peak prices?

**NELPCO's Response:**

N/A. NELPCO does not possess information regarding whether the price of fuel went up during the Winter Storms or regarding the length of time such fuel costs may have remained elevated as it purchases all of its power supply from LaGen.

22. Ultimately, who bears the risk of Locational Marginal Pricing ("LMP") changes throughout MISO? Throughout SPP?

**NELPCO's Response:**

N/A. NELPCO does not possess information regarding who bears the risk of LMP changes throughout MISO or SPP. This question is better directed to MISO and SPP for a complete response.

23. Could different measures have been taken in preparation for the Winter Storms in order to prevent fuel shortages? If so, why were those measures not taken?

- a. Should these measures have been taken when the Winter Storms were forecasted in weather reports?

**NELPCO's Response:**

N/A. NELPCO does not purchase or import fuel as it purchases all of its power supply from LaGen; therefore, it is not in a position to respond to this RFI.

- a. N/A. See the response to RFI No. 23, above.

**Questions pertaining to customer service and communication:**

24. How many customers do you serve in the state of Louisiana?

**NELPCO's Response:**

NELPCO serves roughly 11,000 customers in the state of Louisiana.

25. How many customer service representatives<sup>2</sup> do you have in Louisiana answering phone calls or making live calls to your customers? Please provide the job title and business address for each of these employees.

**NELPCO's Response:**

NELPCO has 13 customer service representatives in Louisiana. See below for the job titles and business addresses:

Business address: 1411 Landis Street, Winnsboro, LA

Victoria Conover, Billing Supervisor

Customer Service Representatives:

Brittany Walker, Courtney Crane, Bailey Biggs, Myra Taylor, Betty Turbeville, Dina Crump, Lacie Easterling, Anna Tibbit

Business address: 291 Industrial Blvd, Oak Grove, LA 71263

Cheral Munn and Marla Ainsworth – customer service representatives

Business address: 11705 Crossett Road, Bastrop, LA 71220

Lisa Reynolds and Rebecca Guilbeaux – customer service representatives

26. Do you make live phone calls (non-recording) to communicate to your customers?

**NELPCO's Response:**

NELPCO's customer service representatives make live calls to NELPCO's customers.

27. Do you answer phones with live personnel or use pre-recorded messages to answer phone calls?

**NELPCO's Response:**

NELPCO utilizes live personnel (customer service representatives) to answer phone calls.

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<sup>2</sup> For the purposes of these questions, answering parties should understand that "customer representatives" refer to live, human-being employees of the utility (not a third-party contractor), who are trained to handle customer issues that may arise in the utility's duty to provide service to their customers.

28. Do you have a local (area code within your Louisiana service territory) customer service number, or do you utilize a 1-800 number?

- a. Please explain the advantages or disadvantages of utilizing a local number over a 1-800 number or vice versa.

**NELPCO's Response:**

NELPCO utilizes a local customer service number.

- a. NELPCO knows of no advantage or disadvantage of utilizing the local number over a 1-800 number.

29. Does your company have local, customer service offices or facilities within your Louisiana service area?

- a. If so, please explain any perceived or realized advantages of such local facilities.

**NELPCO's Response:**

Yes.

- a. NELPCO believes that local customer service offices within its service territory is an advantage for its customers as it provides them an additional means (other than telephone or electronic messaging) to address service issues.

30. On average, when a customer calls your customer service number, how long does it take for them to reach a live person who can answer their questions?

- a. Will that live person always be in Louisiana?
- b. Do customers have to press extension numbers to reach a live person?

**NELPCO's Response:**

NELPCO's customer service representatives answer customer calls immediately.

- a. Yes.
- b. No.

31. Are your customer service representatives able to communicate directly to other departments of your utility operations in order to get helpful, accurate information efficiently for customers calling in?

**NELPCO's Response:**

Yes.

32. Do you utilize text notifications to communicate with your customers? Did this service work during these past Winter Storms?

**NELPCO's Response:**

No.

33. Do you utilize automated phone calls to communicate with your customers?

**NELPCO's Response:**

No.

34. Do you utilize email notifications to communicate with your customers?

**NELPCO's Response:**

Yes.

35. Do you have personnel dedicated to monitoring social media pages related to your company as well as social media pages in general and social media trends within your service territory in order to further understand any problems that may be arising for your customers and/or communicate directly with customers?

- a. Do you answer questions your customers post on social media?
- b. Do you find a social media presence is helpful in responding to your customers?

**NELPCO's Response:**

No.

- a. N/A. See the response to RFI No. 35, above.
- b. N/A. See the response to RFI No. 35, above.

36. Do you have an automated or advanced meter system?

- a. If so, did it function/perform properly during the Winter Storms? Why or why not? Please support with examples and evidence.

**NELPCO's Response:**

Yes.

- a. Yes.

37. Does your utility utilize an online outage map accessible to customers?

- a. Was that map accurate during the Winter Storms? Why or why not?

**NELPCO's Response:**

No.

- a. N/A. See the response to RFI No. 37, above.

38. Are your systems able to identify whether a customer has power or does not have power?

- a. If yes, was this function working properly during the Winter Storms?
- b. If yes, are you able to therefore communicate with customers who have power differently than customers who do have power?
- c. At any point during the Winter Storms, did your company ask customers who did not have service to curtail their usage?

**NELPCO's Response:**

Yes.

- a. Yes.
- b. Yes.
- c. No.

39. If your company realizes their customer service or communications systems are not working, what is your company's response to this issue? What mitigation measures are taken to address any malfunctions? What mitigation measures are taken to explain any deficiencies to your customers?

**NELPCO's Response:**

NELPCO communicates with its customers primarily through telephone communication. It also communicates with customers through email. If internet service is interrupted, NELPCO cannot communicate with its customers, either through telephone communication or email.

40. Do you have a public relation, customer service, or other team in charge of crafting and sending out notifications and public outreach messages to your customers?

**NELPCO's Response:**

No.

41. Do you target messages based on relevancy to your customers or simply send general notifications across your entire service territory, regardless of its relevancy for each customer?

- a. If the answer depends on a scenario, please expand on those different scenarios to provide a full understanding of how your teams attempt to best communicate with customers.
- b. Does your company believe that targeted messages (or different forms of messaging) are more useful in ensuring accurate, relevant communication to customers? Why or why not?
- c. What are barriers to communicating tailored, relevant information to each customer that would cause a company to rely only on general communications?

**NELPCO's Response:**

NELPCO sends general notifications across its service territory.

- a. N/A. See the response to RFI No. 41, above.
- b. NELPCO does not have a position on this subpart. That said, while accurate information is always preferred, cost, time constraints, and other factors, such as technology upgrades and maintenance, must be considered when analyzing notification systems.
- c. Manpower is the largest barrier to tailored communications of the type referenced in RFI No. 41.

42. Were you able to get accurate information to your customers before, during and after the Winter Storms?

**NELPCO's Response:**

The phrase "accurate information" is not defined. That said, NELPCO was unable to provide information regarding rolling blackouts and other aspects of the Winter Storms prior to such storms, because such information was unknown at the time. NELPCO believes it provided accurate information concerning outages and restoration efforts to its customers during and after the Winter Storms. The information NELPCO was able to pass along to its customers after the Winter Storms was likely the most accurate since NELPCO possessed greater amounts of information as time went on.

43. What is your utility's total yearly operating budget?

**NELPCO's Response:**

NELPCO does not have an annual operating budget.

44. How much of your utility's total yearly operating budget is allocated to customer service? Please provide dollar number and percentage.

- a. Please break down the dollars allocated to customer service based on categories your utility spends in, such as, but not limited to:
  - i. How much money is spent on human customer service representatives?
  - ii. How much money is spent on automated systems?
  - iii. How much money is spent on physical customer service locations (places where the public can contact either physically or by telephone an individual

dedicated to handling their customer service issue)?

**NELPCO's Response:**

N/A. NELPCO does not have an annual operating budget.

- a. See below:
  - i. NELPCO spends approximately \$363,672.00 per year on customer service representatives.
  - ii. None. NELPCO does not employ automated systems.
  - iii. NELPCO has three (3) branch offices in which customer service representatives are located. NELPCO does not have purely customer service locations.

45. How much does it cost (rough estimate based on current employment) to hire and maintain one customer service representative?

**NELPCO's Response:**

It costs NELPCO roughly \$30,306.00 annually to hire and maintain one customer service representative.

46. Do you feel your customer service and communication allowed for your customers to adequately prepare for events that unfolded during the Winter Storms?

**NELPCO's Response:**

NELPCO believes that its customer service representative provided valuable information and service to its customers during the Winter Storms. It is difficult to estimate whether such customer service representatives allowed NELPCO's customers to "adequately prepare" for the Winter Storms.

47. Do you believe useful and helpful customer service was provided by your company to your customers during the Winter Storms?

**NELPCO's Response:**

Yes.

48. Based on your company's customer service performance in the Winter Storms, does your company plan on increasing the amount of budget they allocate to customer service?

- a. Will your company ask for a rate increase to do so?

**NELPCO's Response:**

Not at this time.

- a. N/A. NELPCO does not plan at this time to seek a rate increase related to customer service.

**Closing Questions:**

49. Please provide all temperature forecasts you received for your Louisiana service territory (and the source of those forecasts) for February 14-20, 2021 and the actual temperatures experienced on those dates.

**NELPCO's Response:**

NELPCO directs the Commission to the presentation it provided to the Commission on February 24, 2021 which contains all temperature readings. NELPCO incorporates its February 24, 2021 presentation into this response by reference.

50. In your opinion, was your utility adequately prepared for the Winter Storms?

- a. Did you customers benefit from your level of preparedness?

**NELPCO's Response:**

As previously mentioned in NELPCO's response to RFI No. 9(a), the Winter Storms were an unprecedented event in NELPCO's service territory. The Winter Storms were much more severe than past ice and winter storms that NELPCO has experienced. NELPCO plans for weather events based upon reasonable estimates as well as past experience. NELPCO's personnel, including its linemen, are adequately prepared to restore power as quickly as possible given safety and mechanical considerations. NELPCO believes that it was prepared for ice and winter storms, but the Winter Storms at issue were a once-in-a-lifetime event that are nearly impossible to fully prepare for. That said, NELPCO is reviewing its storm preparation plans to determine whether improvements can be made.

- a. NELPCO believes that its customers benefitted from its level of preparedness.

51. In your opinion, was your response to the Winter Storms sufficient or to a standard of excellence your customers deserve?

**NELPCO's Response:**

See the response to RFI No. 50, above. NELPCO adds that it believes it responded as well as could be expected to the Winter Storms given their unprecedented nature.

Respectfully submitted:

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