

TPA Statement on Railroad Commission of Texas Weatherization Rules

By Thure Cannon, President Texas Pipeline Association

Since Winter Storm Uri, Texas Pipeline Association (TPA) member companies have worked diligently to ensure that any future extreme weather events do not severely impact the Texas energy grid. This includes working with the Railroad Commission of Texas (RRC), the Texas Energy Reliability Council, Texas state legislators and other regulatory entities.

As part of the response, the Texas State Legislature passed SB3 and <u>the RRC has finalized rules</u> regarding weather emergency preparedness standards for natural gas facilities, including pipelines and related midstream infrastructure.

We applaud all stakeholder's efforts, especially those of the Railroad Commission and its staff, to ensure the integrity of the energy grid during extreme winter weather events, while continuing to maintain the ability of the energy industry to deliver a safe, reliable and affordable source of natural gas to Texas consumers.

Following a similar winter event in 2011, the midstream industry took measures to prevent freezing equipment. And – as pipelines do not freeze because they are buried sufficiently underground – there is a degree of natural insulation for much of the midstream industry's infrastructure.

Consequently, during Winter Storm Uri in 2021, all midstream facilities that received electricity and gas supply sufficient to keep pipeline pressure up during the event were able to continue operations as planned. As Winter Storm Uri set a new threshold for extreme winter weather, there were nonetheless a few equipment failures at those plants. When gas supply to the plants was lost, or the plant lost electric service, it caused processing plants and compressors to shut down, and they had to be restarted when the gas supply and electricity came back on.

To help ensure the integrity of the grid, we believe that winterization is just one step in the process to ensure stability during extreme weather events. In addition, securing firm contracts for natural gas supply and transportation, as well as utilizing the state's vast capacity for storage, are vital components of ensuring that ample gas is available when needed, while limiting the overall economic and regulatory burden to the greatest extent possible.

The midstream industry will continue to work with regulators and legislators to further prepare for any possible future winter events to ensure the delivery of natural gas to Texas homes, businesses and power generators.

September 9, 2022