



**Public Input of Virginia Palacios
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It's been five years since Winter Storm Uri. Every year that I've attended the Railroad Commission Regulatory Conference, an operator has questioned why they have to weatherize their facilities. So it's important to recall the destruction and devastation that left its mark on Texans -who still clear grocery store shelves in response to a freeze warning.

In 2021, temperatures across the state [dropped below freezing](#) for multiple days between February 8th and 20th.¹ Lack of weatherization from natural gas well heads to electric power plants caused 4.5 million power outages across the state. This led to hundreds of deaths, the largest carbon monoxide poisoning event in state history,² and an estimated \$80 - \$130 billion in damages.³ Some of my friends cared for elders, who they piled under blankets, while others sought refuge and safety for their infants in the home of a neighbor -all while a global pandemic raged.

Just ten years prior, FERC had recommended that the Railroad Commission consider "minimum standards for the winterization of gas production and processing facilities."⁴ Of course, no minimum winterization standards were passed between 2011 and 2021. In fact, no minimum winterization standard exists today. Operators argued to put specific measures in a guidance document, instead of the Railroad Commission's 2022 weatherization rule -and the commission relented.⁵ This has led to operators taking the lowest-cost route to

compliance, which may not actually keep gas flowing when we have another storm as severe as Uri.

A report from the State Auditor's office revealed that Railroad Commission inspectors counted any form of weatherization as passing, and "relied on facility operators to determine which weatherization measures are needed and whether those measures are sufficient for that facility."⁶

Allowing the oil and gas industry to police itself was, and still is, a recipe for disaster. We need the commission's inspectors to conduct rigorous weatherization inspections that reflect best practices, not the bare minimum.

Last week, ERCOT data showed that natural gas-fired power plants experienced forced stoppages related to fuel supplies,⁷ causing reduced power availability of 900 megawatts (MW). Meanwhile another 3,900 MW were down for reasons listed as "other," which could also include fuel supply issues, among other factors. Although this was less disastrous compared to Winter Storm Uri, last week's forced outages show that the Railroad Commission still has changes to make to ensure a truly resilient grid.

¹ Federal Energy Regulatory Commission and North American Electric Reliability Corporation, The February 2021 Cold Weather Outages in Texas and the South Central United States (2021), <https://www.ferc.gov/media/february-2021-cold-weather-outages-texas-and-south-central-united-states-ferc-nerc-and>. p. 214 - 215

² Perla Trevizo et al., "Texas Power Outages Led to Carbon Monoxide Poisoning Catastrophe," *The Texas Tribune, Propublica, and NBC News*, August 2021, <https://www.texastribune.org/2021/04/29/texas-carbon-monoxide-poisoning/>.

³ Garrett Golding et al., "Cost of Texas' 2021 Deep Freeze Justifies Weatherization," *Federal Reserve Bank of Dallas*, April 2021, <https://www.dallasfed.org/research/economics/2021/0415.aspx>.

⁴ Federal Energy Regulatory Commission and North American Electric Reliability Corporation, *Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1 - 5, 2011* (2011), <https://www.ferc.gov/sites/default/files/2020-04/08-16-11-report.pdf>.

⁵ Cochran, Haley. August 30, 2022. Memorandum: New 16 TAC §3.66, Relating to Weather Emergency Preparedness Standards. Railroad Commission of Texas. p. 17 of 40, lines 2 – 9.

⁶ Lisa R Collier, An Audit Report on Critical Infrastructure Activities at the Railroad Commission, nos. 25–037 (Texas State Auditor, 2025), <https://sao.texas.gov/reports/main/25-037.pdf#page=3>. Cited in Mose Buchele, "Texas Promised to Winterize Its Energy Grid. An Audit Found Big Problems.," *Energy & Environment, KUT Radio, Austin's NPR Station*, August 18, 2025.

⁷ ERCOT. January 26, 2026. NP1-346-ER, Unplanned Resource Outages Report. <https://www.ercot.com/mp/data-products/data-product-details?id=NP1-346-ER>