

**BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA**

APPLICATION OF BRANDY L. WREATH, )  
DIRECTOR OF THE PUBLIC UTILITY )  
DIVISION, OKLAHOMA CORPORATION )  
COMMISSION, FOR AN EMERGENCY ORDER OF )  
THE COMMISSION TO ASSIST IN STABILIZING )  
THE ELECTRIC AND NATURAL GAS GRIDS )  
THAT ARE NECESSARY FOR PUBLIC HEALTH, )  
WELFARE, SAFETY, AND SECURITY )

CAUSE NO. PUD 2021 00035



**APPLICATION AND MOTION TO ADVANCE  
TO THE COMMISSION EN BANC FOR HEARING**

COMES NOW Brandy L. Wreath, Applicant, Director of the Public Utility Division (“PUD”) and Consumer Services Division of the Oklahoma Corporation Commission (“Commission”) by and through the undersigned counsel and hereby states and alleges as follows:

**I. PARTIES**

Applicant is PUD Director Brandy L. Wreath of the Commission, located at the Jim Thorpe Office Building, 2101 North Lincoln Boulevard, Oklahoma City, Oklahoma, 73105.

**II. ALLEGATION OF FACTS**

Beginning in March, 2020, Governor J. Kevin Stitt issued numerous executive orders declaring an emergency in all seventy-seven Oklahoma Counties caused by the threat of COVID-19 to the people of the State. Most recently, on February 12, 2021, Governor Stitt issued Executive Order 2021-07, again declaring an emergency in all seventy-seven Oklahoma Counties caused by the threat of COVID-19 to the people of the State.

On February 12, 2021, Governor J. Kevin Stitt issued Executive Order 2021-06, declaring a disaster emergency caused by severe winter weather in all seventy-seven Oklahoma Counties, recognizing such weather is expected to cause damage to utilities, including electric and gas systems within the State of Oklahoma causing undue hardship on the citizens of this State.

On February 14, 2021, the Southwest Power Pool (“SPP”), the regional electric transmission organization and independent system operator whose territory includes Oklahoma, issued a notice of an Energy Emergency Alert Level 1 to be effective beginning on February 15, 2021, due to restraints on the electric transmission system to meet firm load obligations and the potential to be unable to sustain its required contingency reserves.

Also on February 14, 2021, the SPP issued a statement addressing its efforts to prepare for worsening conditions due to extreme cold—noting coordination with its members and market participants to respond to high demand for electricity and inadequate supply of natural gas.

Since February 14, 2021, the SPP has been forced to issue an Energy Emergency Alert Level 3 and has asked member utilities to take appropriate load shedding measures.

As a result of the historical demand for natural gas and electricity, Oklahoma gas utilities and transport companies have seen drastic spot price increases and have experienced problems with commodity acquisition, line pressure, and supply shortages.

Because the demand exceeds the supply, an emergency need exists to prioritize natural gas service as feasible in the interest of public health, welfare, safety, and security.

The natural gas emergency and the increased demand on the Oklahoma electric grid, coupled with loss of generation resources, require action to be taken by Oklahoma power providers in an effort to reduce power consumption non-essential to life and welfare to assist in stabilizing the grid.

Additional electricity conservation efforts are also needed in order to assist with the power supply shortages and SPP ordered load shed that has been occurring since February 15, 2021.

This Application is of an emergency nature and time sensitive. The time requirements for public notice of a special meeting or a regular meeting of the Commission would make the procedure for such a meeting impractical and increase the likelihood of injury or damage or immediate financial loss. Therefore, Applicant requests and urges that it be set for hearing immediately before the Commission *en banc*.

### **III. LEGAL AUTHORITY**

The Commission has jurisdiction over this Cause pursuant to Article IX, § 18, of the Oklahoma Constitution and 17 O.S. §152.

### **IV. RELIEF SOUGHT**

WHEREFORE, Applicant respectfully requests that the Commission, in response to the existing emergency described *supra*, order that natural gas service and commodity dispatch immediately be prioritized by the power provider or transport company as follows, to the extent feasible:

1. Deliveries of natural gas to services necessary for life, health, and public safety.
2. Deliveries of gas to electric generation facilities that serve human needs customers.

FURTHER, to assist in stabilizing the electric and natural gas grids that are necessary for public health, welfare, safety, and security, Applicant requests that the Commission direct power providers to:

1. Work with all Oklahoma power users to reduce non-essential power consumption to assist in stabilizing the grid. This should include, but not be limited to, the following:

- Unplug all non-essential electronic devices to avoid passive power consumption
  - Turn off all office and workplace lighting, including exterior illumination, when not necessary for protection of life.
  - Turn off all exterior lighting not used for active public safety during the weather event. This would include lighting to unused parking, exterior beautification, outdoor advertising not of a safety nature, etc.
2. Work with all large power consumers to continue to reduce load as much as is safe to do so.

FURTHER, Applicant requests this order shall terminate on February 20, 2021 at 11:59 p.m. unless the Southwest Power Pool has issued an Energy Emergency Alert Level 3 for February 20, 2021 and has asked member utilities to take appropriate load shedding measures. In this event, the order should stay in effect until 24 hours after the SPP designation is lifted.

FURTHER, Applicant requests that the Commission order any other relief that it deems appropriate.

Respectfully submitted,

Brandy L. Wreath  
Director of the Public Utility Division  
OKLAHOMA CORPORATION COMMISSION

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