December 4, 2020

Commissioner John W. Hellerstedt, M.D.

Texas Department of State Health Services

1100 W. 49th Street

Austin, TX 78756

RE: Vaccine Distribution for Mission-Essential Critical Infrastructure Workforce – Electricity Sector

Dear Dr. Hellerstedt:

On behalf of the undersigned organizations and our memberships, thank you for your leadership guiding the Texas public health response to the COVID-19 pandemic. Under the leadership of Governor Abbott and his team, the Health and Human Services Commission, the Texas Division of Emergency Management, the Texas Military Department, the Public Utility Commission of Texas, and other state agencies have worked effectively to meet these unique challenges.

With COVID-19 vaccines now nearing final approval and release, we are asking that mission-essential electric sector employees be granted high priority for initial inoculation. These employees are highly specialized and cannot work from home or in isolation from others on the job site. The work they perform is critical to public health and safety, as well as our economic and national security.

The electric sector is one of the nation’s 16 Critical Infrastructure Industries.[[1]](#footnote-1) Responding to the pandemic, the electric sector has implemented significant new workforce practices and operational protocols to ensure reliability, such as sequestering critical employee teams and decentralizing maintenance and equipment. These efforts have proven successful and were critically important when responding to hurricane and storm damage earlier this year. Stable, reliable electricity is of tantamount importance at all times, and we are proud to maintain reliability for the state’s hospitals, clinics, businesses, educational facilities and homes, especially during the unique challenges of COVID-19. As the COVID-19 crisis continues, our companies provide the needed, reliable electricity to ensure the viability of the vaccine pipeline.

We support prioritizing vaccination for mission-essential electricity workers, such as line workers, control room personnel, operations and maintenance personnel, and engineers in a manner consistent with the guidance contained in the October 2, 2020, “Framework for Equitable Allocation of COVID-19 Vaccine” by the National Academies of Sciences, Engineering, and Medicine.[[2]](#footnote-2)The final report includes the recommendation that critical infrastructure workers be considered for prioritization based upon their job function and exposure to risks.

The electricity sector remains fully committed to serving our communities and customers. Many of our member companies have existing relationships with industrial or occupational health providers and are prepared to accept the vaccines. We will support the Expert Vaccine Allocation Panel in any way we can.

Please contact any us if we can provide additional information or if we can be of assistance in any way.

Respectfully,



**Julia Rathgeber**

President/CEO

Association of Electric Companies of Texas

julia@aect.net

**Michele Richmond**

Executive Director

Texas Competitive Power Advocates

michele@competitivepower.org





**Mike Williams**

President/CEO

Texas Electric Cooperatives

mikew@texas-ec.org

**Russell T. Keene**

Executive Director

Texas Public Power Association

rkeene@tppa.com

CC:

The Honorable Greg Abbott, Governor

The Honorable DeAnn Walker, Chairman, Public Utility Commission

The Honorable Shelly Botkin, Commissioner, Public Utility Commission

The Honorable Arthur D’Andrea, Commissioner, Public Utility Commission

Members of the Expert Vaccine Allocation Panel

1. [Guidance on the Essential Critical Infrastructure Workforce | CISA](https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce) [↑](#footnote-ref-1)
2. [Framework for the Equitable Allocation of COVID-19 | NAP](https://www.nap.edu/read/25917/chapter/1) [↑](#footnote-ref-2)