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PROJECT NO. 37276

PUBLIC UTILITY COMMISSION  
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<b>PROJECT FOR SUBMITTING</b>	§	<b>PUBLIC UTILITY COMMISSION</b>
<b>COMMISSION EMERGENCY</b>	§	
<b>OPERATIONS PLANS AND</b>	§	
<b>NOTIFICATIONS OF EMERGENCY</b>	§	<b>OF TEXAS</b>
<b>OPERATIONS EXERCISES</b>	§	

**FREEPOINT ENERGY SOLUTIONS LLC's COMPLIANCE FILING PURSUANT TO  
P.U.C. SUBSTANTIVE RULE 25.53**

Freepoint Energy Solutions LLC's parent company, Freepoint Commodities LLC, has a Business Continuity Plan (the "Plan") that addresses disruptions of its and its affiliates' business operations in the event of natural or manmade disasters, a pandemic or cyber security threats.

A high level overview of this Plan is attached. The specific details of the Plan are sensitive in nature and may be provided upon request on a confidential basis.

If you have any questions about the Plan, please feel free to contact me.

Sincerely,



Simona Patru  
Authorized Representative & Legal Counsel  
Office: (713) 239 8064  
[spatru@freepoint.com](mailto:spatru@freepoint.com)



## **FREEPOINT COMMODITIES LLC BUSINESS CONTINUITY PLAN**

### **I. Overview**

This document provides a high level overview of the security and resiliency strategy deployed within Freepoint Commodities LLC (“Freepoint”) and its affiliates in case of an emergency. The main objective is to enforce a stable, reliable and robust operating environment protected from disruptions caused by natural or manmade disasters, a pandemic, or cyber security threats and to ensure processes, applications, and all supporting infrastructure is governed and tested with the highest operational standards.

The use of industry best practices, reliable system design, best in-class product implementation, and continuous end-user training and awareness programs are several of the approaches used to meet the objective.

Because Freepoint has multiple offices and a dispersed workforce, no functional group is entirely located solely in one office. In the event of an emergency in a Texas location, the non-Texas offices would provide functional support as needed. Additionally, Freepoint’s and its affiliates’ employees have the ability to work remotely.

### **II. Fire or Other Emergency at the Houston Office**

Employees will be notified of the need to evacuate the building and evacuated in accordance with the building manager’s evacuation procedures which may be invoked in response to:

- Fire;
- Hazardous material release or spill;
- Explosion or threat thereof;
- Bomb threat or suspicious package;
- Gas leak;
- Forecasted natural disaster (hurricane, flooding, etc.);
- Extended utility outage.

If there is a permanent loss of the office, Freepoint’s management will select a new office space and coordinate the transition.

### **III. Information Technology Security and Resiliency Strategy**

The details of this plan are sensitive and may be provided upon request on a confidential basis.

PROJECT NO. 37276  
AFFIDAVIT

STATE OF TEXAS

COUNTY OF HARRIS

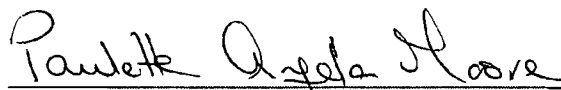
Before me, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated as follows:

1. My name is Simona Patru, Associate General Counsel of Freepoint Commodities LLC ("Freepoint"), the parent company and guarantor of Freepoint Energy Solutions, LLC ("Freepoint Solutions"). Freepoint Solutions is a certified retail electric provider ("REP") in Texas under Certificate No. 10248.
2. I swear or affirm that I am familiar with the facts stated herein.
3. Freepoint maintains a comprehensive business continuity plan that will be used in the event Freepoint's and its affiliates' business operations should be interrupted by natural or manmade disasters, a pandemic or cyber security threats.



\_\_\_\_\_  
Simona Patru  
Associate General Counsel, Freepoint Commodities LLC

SWORN TO AND SUBSCRIBED before me on the 25<sup>th</sup> day of June, 2018.



\_\_\_\_\_  
Notary Public In and For the State of Texas

My commission expires: August 7, 2021

