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PHR Holdings LLC
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

EXECUTIVE SUMMARY

For the PUC of Texas

Submitted to:

PUC of Texas, PUC Document No.: 53385
ERCOT via ERCOT MIS Service Request

Texas City Fire Department
Bacliff Volunteer Fire Department
Galveston County LEPC

Date: 13 March 2023 (Rev1)

EXECUTIVE SUMMARY

1.0 Introduction (Rev1)

The PHR Holdings, LLC. Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. PHR Holdings LLC is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement an EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly. (Rev1) This Executive Summary is a description of the contents and policies of the PHR Holdings LLC EOP, along with a summary of revisions and references to the required EOP sections with page numbers. In addition, a record of distribution and an affidavit are included. (Rev1)

2.0 Description of Contents and Policies (Rev1)

The PHR Holdings Emergency Operations Plan (EOP) includes emergency response activities across common operational functions, such as facility evacuations and shelter-in-place. In addition, the EOP contains information regarding annual EOP drills, weather identification and EOP initiation procedures, emergency response supplies and staffing, a Communication Plan, and a Business Continuity Plan. Annexes relating to preparedness and response measures for specific types of emergencies are also included, such as annexes relating to weather emergencies, water shortages, restoration of services following disruption, pandemics and endemics, hurricane preparedness and response, cyber security, and physical security incidents. Finally, site-specific procedures and checklists have been provided as Attachments to the EOP.

3.0 Record of Submittal of EOP

The PHR Holdings EOP, including subsequent revisions, has been distributed to the following agencies and local jurisdictions (Rev1):

PUC of Texas
Project No: 51841
Filed Under Control Number: 53385
(Redacted Version)
(Unredacted Version available upon request.)

ERCOT
Filed via ERCOT MIS
(Unredacted Version)

Texas City Fire Department
Mr. David Zacherl, Chief
1725 25th St. N.
Texas City, TX 77590

Bacliff Volunteer Fire Department
Mr. James Wistinghausen
600 Grand Avenue
P.O. Box 751
Bacliff, TX 77518

Galveston County LEPC
Mr. Scott Tafuri
1353 FM 616 W. Ste. 201
Dickinson, TX 77539
jbedford@victoriatxoem.org

4.0 Annual Update Process

Following the initial submittal of the EOP (Rev0) dated April 18, 2022, annual updates will be submitted as required. Annual EOP updates will include changes that were made during the previous calendar year that materially affect PHR Holdings' response to an emergency. Annual EOP revisions will be submitted, along with an updated Executive Summary and a signed affidavit. A redacted copy of annual EOP updates will be submitted to the PUC, and an unredacted copy will be submitted to ERCOT on or before March 15th each year as required. REV1

5.0 Material Changes Made to EOP since last Version (Rev1)

PHR Holdings is submitting a revised Emergency Operations Plan (Rev1), along with this Executive Summary, dated March 13, 2023. Inconsequential revisions, including re-formatting, have been made throughout the EOP. In addition, typographical errors have been corrected, references to the sites' O&M provider (NAES) have been removed to avoid confusion, section numbers have been updated as applicable, and references to form names have been revised as needed. On the other hand, a list of revisions (or updates) to the EOP that could potentially have a material effect on how the site would respond to an emergency are provided in the table below. As previously indicated, revisions have been labeled (i.e., Rev1) throughout the EOP:

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6.0 EOP Contents and Rule Requirements by Section and Page (Rev1)

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2.1	Common Operational Functions	[§25.53(d)]	7
2.8	Reporting Requirements	[§25.53(g)]	9
2.9	Drills	[§25.53(f)]	9
2.10	Communication Plan	[§25.53(d)(2)]	9
2.11	Emergency Supplies Maintenance Plan	[§25.53(d)(3)]	10
2.12	Emergency Response Staffing Plan	[§25.53(d)(4)]	10
2.13	Plan for Identifying Weather-Related Hazards	[§25.53(d)(5)]	10
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3.3	Restoration of Service Annex	[§25.53(e)(2)(C)]	13
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7.0 Record of Distribution [§25.53(c)(4)(A)]

The titles and names of persons within the PHR Holdings organization receiving access to and training on the contents of the site's Emergency Operations Plan, along with access or training dates, are as follows:

Tile	Name	Date of access to and/or training on this EOP
Plant Manager	Roger Lee	03/09/2023
CRO - EHC	Jacob Webb	03/09/2023
CRO	Patrick Daly	03/09/2023
CRO	Ron Dennison	03/09/2023
CRO	Clyde Mahan	03/09/2023
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Plant Admin	Destini Wilson	03/09/2023
OM T - EHC	Kyle Miller	03/09/2023
OMT	Ryan Moore	03/09/2023
OMT	Joel Ayala	03/09/2023
OMT	Corbin Gilbert	03/09/2023

8.0 Emergency Contacts [§25.53(c)(4)(B)]

Emergency Contact Name	Title	Phone	Email
Keith Feemster	Vice President, Rockland	409-988-4624	Keith.Feemster@rocklandcapital.com
Matt Becker	Vice President, Rockland	713-203-1793	Matt.Becker@rocklandcapital.com
Roger Lee	Plant Manager	(713} 299-2017	rlee@phrpeakers.com
JL Nelson	Operations Director	(252) 532-7327	JL.Nelson@naes.com
Tammy Russell	Emergency Management Coordinator	(832} 514-9275	Tammy.Russell@NAES.com

AFFIDAVIT

[as required by §25.53(c)(4)(C)]

STATE OF TEXAS)

COUNTY OF MONTGOMERY)

PERSONALLY came and appeared before me, the undersigned Notary, the within named Will Zapalac, President, who is a resident of Montgomery County, State of Texas, and makes this his statement and Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his knowledge:

1) Relevant operations personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan (EOP), and such personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as the result of specific circumstances during the course of an emergency;

2) The EOP has been reviewed and approved by the appropriate executives;

3) Drills have been conducted to test the EOP or portions of the EOP to the extent required;

4) The EOP, or an appropriate summary, has been distributed to local jurisdictions as needed;

5) PHR Holdings, LLC (the entity) maintains a business continuity plan that addresses returning to normal operations following disruptions caused by an incident;

6) The entity's emergency management personnel who are designed to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

DATED this the 13TH day of March, 2023.

Will Zapalac, President

SWORN to subscribe before me, this 13TH day of MARCH, 2023.

KRISTIN WARNKE
My Notary ID # 10267784
Expires April 27, 2024

NOTARY PUBLIC

PHR Holdings LLC

Emergency Operations Plan (EOP)

(Per 16 TAC Sect. 25.53)

Submitted to:

PUC of Texas, PUC Document No.: _53385_____
ERCOT via ERCOT MIS Service Request
Texas City Fire Department
Bacliff Volunteer Fire Department
Galveston County LEPC

Date: 27 February 2023 (Rev1)

Table of Contents

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JL Nelson	Operations Director	(252) 532-7327	JL.Nelson@naes.com
Tammy Russell	Emergency Management Coordinator	(832} 514-9275	Tammy.Russell@NAES.com

2.0 EMERGENCY OPERATIONS PLAN (EOP)

2.1 Common Operational Functions Relevant Across Emergency Types [§25.53(d)]

Plans within this document describe the process used to report and respond to unusual events outlined in 16 TAC Sect. 25.53. Plant management will immediately review pertinent event information, assess the applicability of the event as it pertains to this procedure, (Rev1) and make a determination on whether further action is needed. Plant management should perform this activity as expeditiously as possible.

Should plant management determine that action is needed for events outlined in 16 TAC Sect. 25.53. The following relevant emergency operation procedures shall be made active at once. If disaster or interruption to normal business occurs Business Continuity Plans and/or recovery instruction outline in corresponding plans will be invoked.

2.2 Approval and Implementation

The following Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC

of Texas (the Commission) on February 25, 2022. PHR Holdings LLC is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

2.3 Individuals Responsible for EOP Maintenance and Changes [§25.53(d)(1)]

2.3.1 Plant Manager (or designee)

A. Responsible for the execution of this plan.
B. Responsible for annual drills and ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan.
C. The Plant Manager shall maintain, review, and update this Plan. Plant Manager is authrorized to make changes as necessary. (Rev1)

2.4 Plan Assessments

Assessments will be conducted following annual drills and actual related emergencies to assess the overall effectiveness of the Plan.

2.5 Annual Updates and Submittals

Beginning 2023, if changes were made during the previous calendar year to this Emergency Operations Plan that materially affect emergency response efforts, the Facility will update this Emergency Operations Plan accordingly, no later than March 15th, each calendar year. In addition, the Facility will submit an executive summary to the commission that:

I. describes the changes to the contents or policies contained in this EOP;
II. includes an updated reference to specific sections and page numbers of this EOP (Contents – Required Sections) that correspond with the requirements;
III. includes a record of distribution as required; and
IV. contains an affidavit as required.

In the event that no changes were made during the previous calendar year to this Emergency Operations Plan that would materially affect emergency response efforts, the Facility will, in the alternative, file the following with the commission:

I. a pleading that documents any changes to the list of emergency contacts as required;
II. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating that that entity did not make a change to its Emergency Operations Plan that materially affects how the entity would respond to an emergency; and
III. an affidavit as required.

2.6 Revision Control [§25.53(d)(1)]

This Plan shall be reviewed not less than annually to confirm accuracy. (Rev1)

(Rev1)A revision control summary that lists the dates of each change made to the EOP since the initial filing date (April 18, 2022) will be included. (Rev1)

2.7 Revision Block with Approval Dates [§25.53(d)(1)]

Rev.	Date Approved	Revision Summary	By
0	04/18/2022	Initial Submittal	RLEE (Rev0)
1	2/27/2023	Revised plan format, names of personnel, update of several attached plans.	RLEE (Rev1)

This Emergency Operations Plan (EOP), with approval date of April 18, 2022, supercedes all previous Emergency Operations Plans. (Rev1)

2.8 Reporting Requirements

Upon request by the PUC commission staff during activation of the State Operations Center by Texas Division of Emergency Management (TDEM), the updates will be provided on the status of operations, outages, and restoration efforts as required. Status updates will continue until incident-related outages are restored, unless otherwise notified by PUC commission staff.

The Facility will provide documentation of the event and/or lessons learned as required, if requested from PUC commission staff, by the date specified by the commission staff.

2.9 Drills [§25.53(f)]

PHR Holdings LLC will conduct or participate in a minimum of one (1) drill each calendar year to test and assess the effectiveness of this Emergency Operations Plan. Following each drill, the Emergency Operations Plan will be revised as needed. If, however, PHR Holdings LLC has activated this Emergency Operations Plan in response to an actual related emergency, performance of or participation in an annual drill is not required for that calendar year.

2.9.1 Hurricane Drills

The facility operates in a hurricane evacuation zone as defined by the Texas Division of Emergency Management (TDEM) and will conduct an annual drill of the Hurricane Preparedness and Response Annex during each calendar year. (Rev1)

2.9.2 Drill Notices

At least 30 days prior to the date of at least one drill each calendar year, the facility will notify PUC commission staff (using the method and form prescribed by the commission) and TDEM District Coordinators (by email or other written form) of the date, time, and location of the drill. (Rev1)

2.10 Communication Plan[§25.53(d)(2)]

At least one employee will have received training in the following National Incident Management Training (NIMS) Courses:

- ICS-100: Introduction to the Incident Command System

- ICS-200: ICS for Single Resources and Initial Action Incidents
- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

The Emergency Management personnel trained in the above courses can provide Communications with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator.

In accordance with Administrative Procedure AMP108 (Attachment A): (Rev1)

> The Operations Director must be notified as outlined in administrative procedure AMP108 Appendix A (Attachment B of this procedure). Notification attempts should be continued until there is confirmation that the message was received. Notification can be made by phone or email, provided confirmation of receipt is obtained. Leaving a phone message without receiving confirmation of receipt does not constitute notification.
>
> For emergency situations, the Operations Director will take responsibility for providing the subsequent internal company notifications as appropriate. (Rev1)
>
> For non-emergency situations, the Plant Manager and Operations Director will agree on how subsequent internal notifications will be made. (Rev1)

Specific notification, reporting and documentation requirements for emergencies are detailed in Safety Procedure SMP-2, Emergency Response Procedure (Attachment C). (Rev1)

2.11 Emergency Supplies Maintenance Plan [§25.53(d)(3)]

Emergency Supplies are identified in each of the Hurricane Preparedness, Winter Weatherization, and Summer Weatherization documents.

Annually, the Plant Manager of PHR Holdings LLC will ensure that adequate supplies to respond to an emergency are located onsite. Non-perishable food and bottled water are provided for site workers and supplied to the site in sufficient quantity to ensure three days' worth of supplies for five people in the event of an emergency. (Rev1)

2.12 Emergency Response Staffing Plan [§25.53(d)(4)]

Staffing levels will be adjusted according to the type and severity of the Event.

In the event of severe weather, the Plant Manager of PHR Holdings LLC will staff the facility with personnel according to the procedures outlined in the facility weatherization plans in attachments D, E and F. (Rev1)

In the event of Pandemic Response, Plant Manager will determine whether PHR Holdings LLC will be operated either at full staffing, or reduced staffing based on the location of the outbreak.

2.13 Plan for Identifying Weather-Related Hazards [§25.53(d)(5)]

In accordance with LEPC recommendations, procedures will be based on the storm's category +1. Therefore, a tropical storm would be planned as a Category 1 hurricane, a Category 1 hurricane as a Category 2 hurricane and so on.

The National Weather Service categorizes hurricanes by intensity on a scale of 1 to 5, which includes:

Hurricane Intensity	Wind Speed	Tide Surge
Category I	74-95 mph	4-5 ft.
Category II	96-110 mph	6-8 ft.
Category III	111-130 mph	9-12 ft.
Category IV	131-155 mph	13-18 ft.
Category V	155+ mph	18+ ft.

(Rev1)

3.0 ANNEXES

3.1 Weather Emergency Annex [§25.53(e)(2)(A)]

The PHR Holdings LLC Weatherization Plans, which have been prepared and filed with ERCOT, are consistent with the ERCOT Nodal Protocols and incorporated herein. (Rev1)

3.1.1 General Severe Weather

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

In the event of a severe weather threat, PHR Holdings LLC will implement the applicable sections of Safety Manual Procedure SMP-02 Emergency Response Plan (Attachment C). (Rev1)

- The Plant Manager shall be notified and will try to be on-site to determine appropriate action.
- If the Plant Manager cannot be contacted, then the Plant Manager Designee shall determine the appropriate action.
- During severe thunderstorms, caution should be used during outside activities.
- If thunderstorms are in the immediate area of the plant, outside activities should be curtailed.
- The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.
- The best protection in a tornado is usually an underground area. The best above ground areas in a building are:
    - Small interior rooms on the lowest floor without windows,
    - Hallways on lowest floor away from outside doors and windows,

- Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.

3.1.2 Cold Weather - Emergency Response Operational Plan

As required under PUCT Electric Substantive Rules & ERCOT Nodal Protocols Section 3.21, NAES Corporation and PHR Holdings LLC have prepared a weatherization plan to address measures taken to prepare for extreme winter weather events. (Rev1)

Routine cold weather preparation is to take place prior to the onset of the winter season. Preparation is to include an evaluation of overall plant preparedness and any equipment condition or issues that might affect plant operation in cold weather.

Refer to Winter Readiness Plan (Attachment D).

Annually, the following actions are to be taken:

1. Conduct an inspection of, including but not limited to, the following systems:
    a. Piping Insulation
    b. Heat Trace
    c. Instrumentation, Coalescing Devices, Sensing Lines, and Control Valves
    d. Lubricating and Hydraulic Systems including Heaters
    e. Demin, Water Wash, and Wastewater
    f. Compressed Air System including Dryers
    g. Air Filtering Systems
    h. Inlet Filter Housings
2. Note any deficiencies in freeze potential and insulation systems. Requisition repair materials and labor to effect repairs on any deficiencies identified in the inspection.
3. Inventory and restock portable heaters, spare insulation materials and materials to provide temporary wind blocks, heat sources, and insulating blankets.
4. Stage portable heaters, additional blanketing and insulation materials, and wind blocks and barriers.
5. File forms in Winterization Binder in Control Room and maintain for future records and audits.

3.1.3 Verification of Fuel Switching Equipment

During normal operations, natural gas is supplied to plant via pipeline from Kinder Morgan. PHR Holdings LLC burns pipeline quality natural gas exclusively

and has no provisions for on-site storage of alternate fuels as well as no alternate supplier of fuel gas.

3.1.4 Cold Weather Emergency Response Checklists

Cold Weather Emergency Response Checklists (Attachment D, Pages 82-88) are to be reviewed annually and updated with lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

3.1.5 Hot Weather – Emergency Response Operational Plan

PHR Holdings LLC has the potential to be subject to temperatures at or above 100 deg. F. However, the units and associated equipment are designed to operate at temperatures above 100 deg. F. As with any situation, personnel safety and preservation of equipment are priority when responding to extreme weather conditions.

The Summer Readiness Procedure is to detail the steps necessary to place the plant into a Hot Weather readiness condition for operation, along with verifying that all extreme hot weather preparations and building cooling is operating correctly for the summer months. As per the Emergency Operations Plan, SOP PHR SUMMER (Attachment E) is to be completed by May 15th each year. (Rev1)

The following major equipment must be prepared for summer operations:

- Demineralized Water System
- Cooling Systems
- Compressed Air System
- Waste System Piping
- Lube Oil Systems – Turbine, Generator and Hydraulic

3.1.6 Hot Weather Emergency Response Checklists

Hot Weather Emergency Response Checklists are to be reviewed annually and updated with lessons learned from weather emergencies to ensure necessary supplies and personnel are available through the weather emergency. (Rev1)

3.2 Water Shortage Annex [§25.53(e)(2)(B)]

Currently, groundwater is the plant's only source of water and groundwater in the area is typically drought resistant. In the event of an emergency shortage of water the plant will maintain the ability to continue normal operation. (Rev1)

3.3 Restoration of Service Annex [§25.53(e)(2)(C)]

[redacted]

[redacted]

3.4 Pandemic and Epidemic Annex [§25.53(e)(2)(D)]

The purpose of Safety Procedure SMP-20 (Attachment G) is to provide a coordinated and comprehensive response to a pandemic event in order to help ensure continuation of operations. (Rev1)

A Pandemic is defined as "(of a disease) prevalent over a whole country or the world." An Epidemic is defined as a widespread occurrence of an infectious disease in a community at a particular time. (Rev1) The response plans used for an epidemic would be similar to a pandemic response.

The procedure describes potential pandemic threats, identifies and prioritizes the critical operations and business functions of this facility, and provides appropriate response guidelines.

The information in this Plan is based on generally accepted assumptions about the development, outbreak, and expected progress of an influenza pandemic. Site-specific information required for implementing this Plan (contact lists, recovery details, etc.) are provided via site specific Appendices. Control and survival of a pandemic will depend on the ability of thoughtful individuals to conduct a well-planned and well-organized response. The ultimate objective of this Plan is to prepare those individuals for success.

3.4.1 Facility Staffing Plan

Once it has been determined that a pandemic outbreak is in full force, a determination will be made as to whether PHR Holdings LLC will be operated either locally or remotely based on the location of the outbreak.

If PHR Holdings LLC is operated locally, there will be limited staff available on-site (personnel totaling two or three at the most). Once plant compressed air system is operations, PHR Holdings LLC can be operated remotely with no staff on-site, if it becomes necessary. (Rev1)

Key Personnel and Critical Skills are identified in Safety Procedure SMP-20 Tables 4 and 5. (Rev1)

3.4.2 Critical Vendors and Contractor Support (Rev1)

Vendor List

The following list of vendors is in priority order as to those that would have the greatest and most immediate impact on the facility:

- Kinder Morgan (Fuel Manager)
- CenterPoint Energy

Potential Contract Support (if required)

Potential additional contractor support that may be required would primarily fall in the Technician area but could affect other areas depending on the timing of the pandemic.

- Temporary on-site Technician personnel to assist major equipment breakdowns
- High-Voltage contractor for invasive repairs
- Crane contractor for lifting process with major component repairs

3.4.3 Communications Plan

PHR Holdings LLC has a list of the employee's telephone and cell phone numbers in case of an emergency in accordance with Safety Procedure SMP-20 Appendix E – Employee Contact Information. On-site communication tools are adequate for this type of event. (Rev1)

If a pandemic outbreak is imminent, an effort will be made by Plant Manager or designee to collaborate with local health officials on availability of immunization shots for critical plant personnel. In addition to local bulletin boards and websites, NAES Corporate Pandemic Response Team will monitor World Health Organization (WHO) and Centers for Disease Control (CDC) websites daily for updates to potential health threats and informational broadcasts.

A communication chain will be developed so that working staff members are aware of who within the facility staff is healthy and available and who has been infected by the outbreak.

3.4.4 Security

3.4.5 Training, Drills, and Vaccinations

Training will be conducted for all staff members prior to a viral outbreak and again at the first signs of a developing pandemic. The focus of the training would be on the early symptoms of the virus, nature of the virus (i.e. how it is spread), how long it lives on surfaces outside the body, and how to minimize the chances of being infected. The need for exceptional personal hygiene, especially hand washing, would be emphasized. Guidance would be provided, and expectations would be set on how to minimize the risk of spreading the disease. Training on

vaccinations and their potential side-effects should be conducted by the medical staff administering the vaccine. After training has been completed, all staff personnel should be screened for willingness to receive the vaccine. An effort will be made by Management to obtain vaccines for critical employees.

Personnel denying receipt of the vaccination will sign a waiver documenting their training, understanding vaccine's purpose, and the potential consequences of refusal of the vaccination.

3.4.6 Critical Personnel Protective Equipment and "Clean Area"

In anticipation that Personal Protective Equipment (PPE) will become more limited and harder to obtain, the facility will stock extra amounts of appropriate PPE and made available to all personnel.

Proper sanitization of normally occupied areas and commonly used items will be followed based upon recommendations per NAES Corporate Pandemic Response Team, World Health Organization (WHO) and Centers for Disease Control (CDC).

The Control Room will be designated as a "clean area" where only essential personnel will be allowed to enter once an outbreak has been confirmed.

3.4.7 Interaction with Local Health Department

Portions of this plan may be altered impromptu in accordance with suggestions and/or mandates by either County or State Health Departments.

Contact Information:

Galveston County Health District (Rev1)
9850-A Emmett F Lowry Expy A108
Texas City, TX 77591
(409) 938-7221

3.4.8 Post Pandemic Actions

Normal facility operation may be resumed once Pandemic Management Task Force consisting of the Operations Director, Safety Manager and Plant Manager have determined it is safe to do so. (Rev1)

3.4.9 Conclusion

In the event a pandemic does take place, it will be NAES and PHR Holdings LLC primary goal to assist its employees through all challenges put forth by a pandemic.

3.5 Hurricane Preparedness and Response Annex [§25.53(e)(2)(E)]

PHR Holdings LLC has a Hurricane Preparedness procedure (Attachment F). This procedure establishes plant policy for actions during periods of severe weather during commercial operations.

This procedure provides information and outlines steps to protect personnel and equipment against the possible destruction of a hurricane and is a guideline to follow rather than a set of rigid rules. The severity, speed and expected area of landfall will determine the time that these steps will be taken. The Plant relies on the National

Weather Service broadcasts for the latest changing weather conditions and the probability values for possible landfall of a tropical storm or hurricane. (Rev1)

3.6 Cyber Security Annex [§25.53(e)(2)(F)]

[redacted]

3.6.1 Cyber Security Awareness

[redacted]

[redacted]

3.6.2 Physical Security Controls

[redacted]

3.6.3 Electronic Access Controls

3.6.4 Cyber Security Incident Response

[redacted]

3.6.5 Declaring and responding to CIP Exceptional Circumstances (CEC)

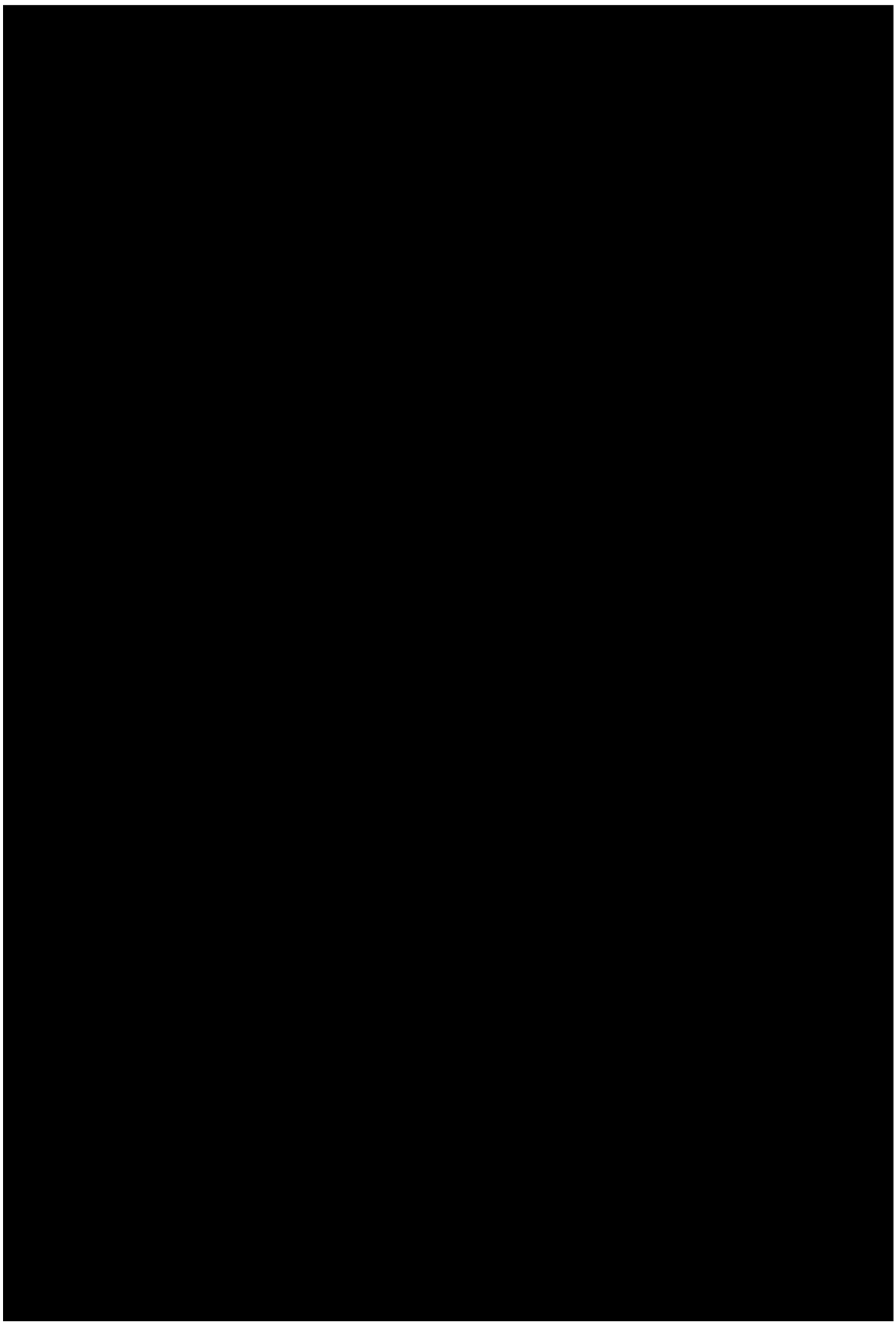
Declaring a CEC:

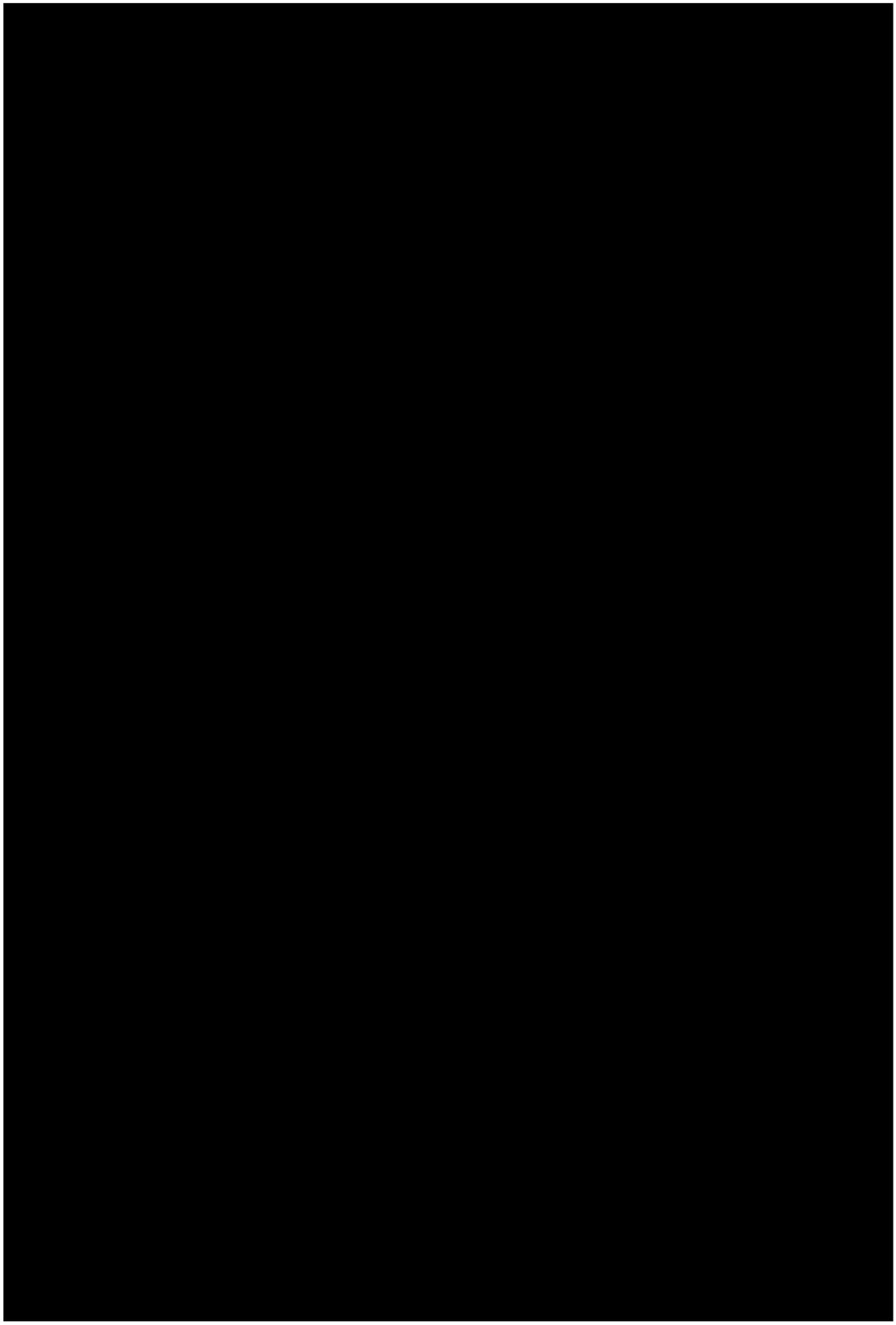
[redacted]

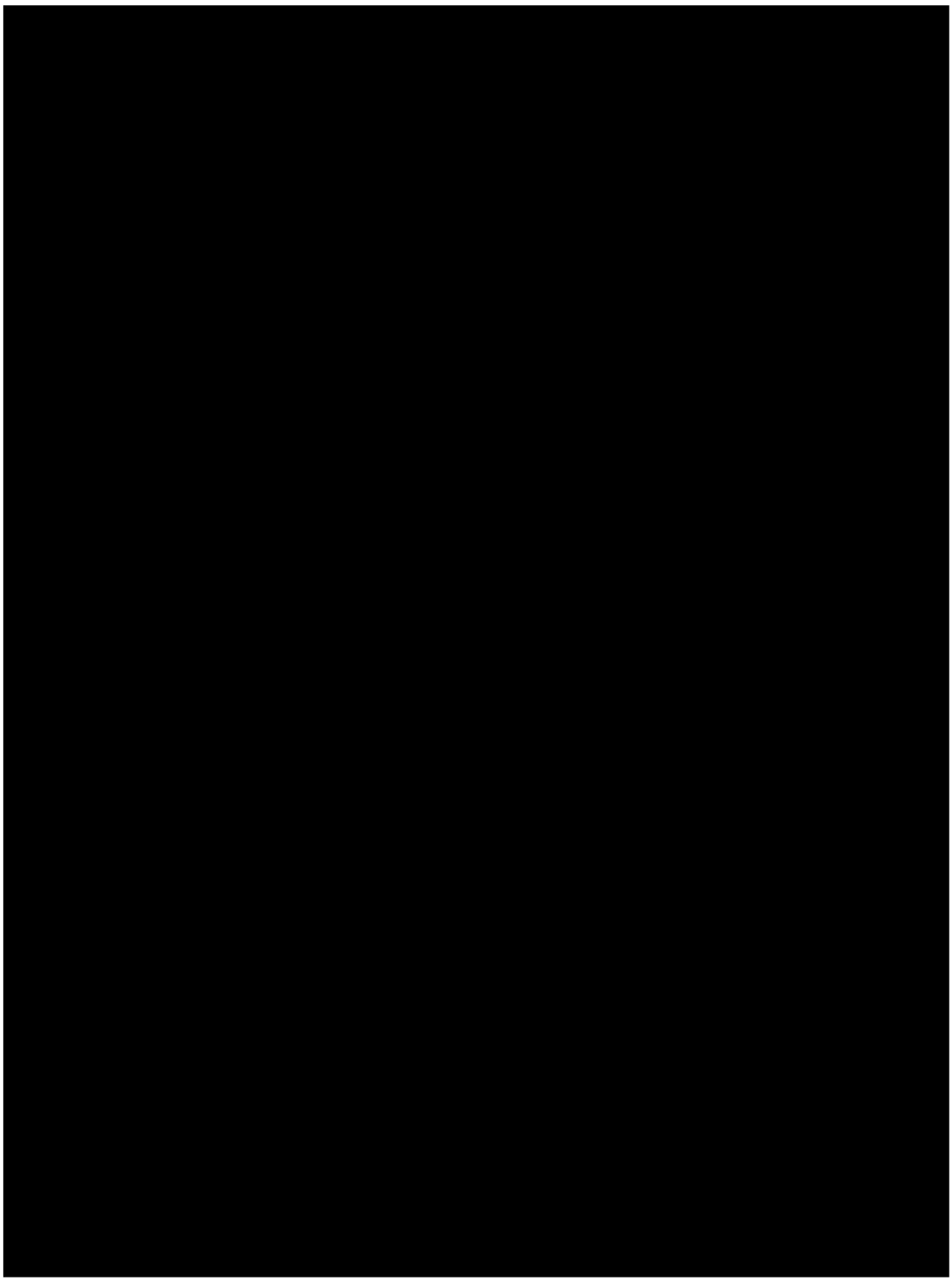
[redacted]

3.6.6 Cyber Security Incident Response Plan

[redacted]







3.7 Physical Security Incident Annex [§25.53(e)(2)(G)]

3.8 Communications Plan [§25.53(d)(2)]

This Communication Plan describes the procedures used during an emergency for communicating with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator. The plan addresses communication skills, training requirement, media communication instructions, and contacts.

This Communication Plan is designed for crisis communications for use in any situation. It has been adapted from existing EOPs and SOPs. The communication plan is used in conjunction with pertaining plans and procedures. This plan is intended to be used with existing plans and procedures in part with and not in place of.

This plan supplies responders and relevant personnel with a communication plan to inform across jurisdictions, disciplines, and levels of government as needed and if required. The procedure assists in reliable and timely communications among responders and relevant personnel and between public agencies.

PHR Holdings LLC responds to events that will impact the bulk electrical system. PHR Holdings LLC works in conjunction with the facility's Qualified Scheduling Entity (QSE) to relay facility conditions. If PHR Holdings LLC identifies an event impacting the operation of the facility, PHR Holdings LLC shall contact Qualified Scheduling Entity (QSE) as soon as practicable.

3.8.1 Event Response

When an Event has occurred, and a notification has been sent out from the facility, the Plant Manager will be the primary point of contact for employees, and the Emergency Management Coordinator will serve as the single point of contact for all response events to the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity.

After initial notification of the event, the Plant Manager will contact and notify the Corporate Operations Director, and facility ownership.

The Plant Manager, in coordination with the Operations Director, will determine if a Crisis Management teleconference will be initiated for this event. If a teleconference is initiated, the Operations Director will utilize contact information attached to the event.

MEDIA

The need for a rapid message to media and / or elected officials is determined by the Facility President. The Emergency Management Coordinator will craft messages, with assistance from the Leadership Team and Plant Manager, as necessary. Targeted audiences for messages will be determined and considered.

The official media communication messages will be distributed as appropriate by the Facility President or designee. (Rev1)

Media Relations Do's and Don'ts for Employees

DO

- Always put reporters or local media in touch with media relations first.
- Make yourself familiar with the official media relations policy, available on Connect.
- Contact us if you're not sure about something.
- Ask for coaching or talking points if you are asked to speak in public.

DON'T

- Say "No comment." Most often, it leaves the impression of hiding information from the public.
- Instead, refer questions to media relations.
- Try to handle a hostile reporter on your own.
- Immediately agree to an interview.
- Approach the media on your own or solicit media stories on behalf of the company.

"What do I do when contacted by the media?"

If the media tries to contact you or shows up at your location, your first step should be to contact the Operations Director and facility Plant Manager before any other kind of response.

COMMUNICATION PLAN CONTACTS

CONTACT NAME	Line Detail	PHONE
Qualified Scheduling Entity (QSE)	Main:	1-877-336-3480
	Cell:	1-713-597-1821
Kinder Morgan - Tennessee Gas Pipe Line Station #9	Office: Daren Juroske	361-782-1686
Energy Transfer Gas (Houston)	Toll-free:	1-800-392-1965
PUCT Assistance	Hotlines:	1-888-782-8477
	Hotlines:	1-512-936-7120
Office of Public Utility Counsel (OPUC)	Austin:	1-512-936-7500
	Toll-free:	1-877-839-0363
	Fax:	1-512-936-7525
Galveston County Emergency Management Coordinator	Office:	(281)-309-5002
Texas Division of Emergency Management (TDEM)	Main Number/Texas State Operations Center:	1-512-424-2208
	ASSISTANT CHIEF:	1-281-517-1353
	SECTION CHIEFS:	1-409-504-0390
		1-215-952-9061
	DISTRICT COORDINATOR 16D:	1-281-633-4827
Texas RE	Main:	1-512- 583-4900

Reliability Coordinator

PHR Holdings LLC will be in compliance with NERC-EOP-004-4 Event Reporting. Upon investigating and confirming a Reportable Event, the Plant Manager and Operations Director will perform internal communications in accordance with AMP-108 Appendix A (Attachment B). (Rev1)

Plant Manager will submit a Reportable Event by completing the following forms:

- NERC Reliability Standard EOP-004-4 Attachment 2: Event Reporting Form, or
- Department of Energy form: DOE-OE-417

Texas Reliability Entity, Inc.

Lewis De LaRosa: Reliability Engineer, Senior

805 Las Cimas Parkway, Suite 200

Austin, Texas, 78746

Office: 512-583-4984

Cell: 512-228-2194

Lewis.DeLaRosa@TexasRE.org

www.texasre.org

COMMUNICATION REPORTS

Incident notifications will be made to the Operations Director within the time frames listed in the Incident Notification and Reporting Matrix timeline of AMP-108, attachment B of this procedure. Subsequent notifications to NAES internal groups and Owner representatives may be made by the Plant or Operations Director provided all applicable notifications are completed as specified in the attachment. (Rev1)

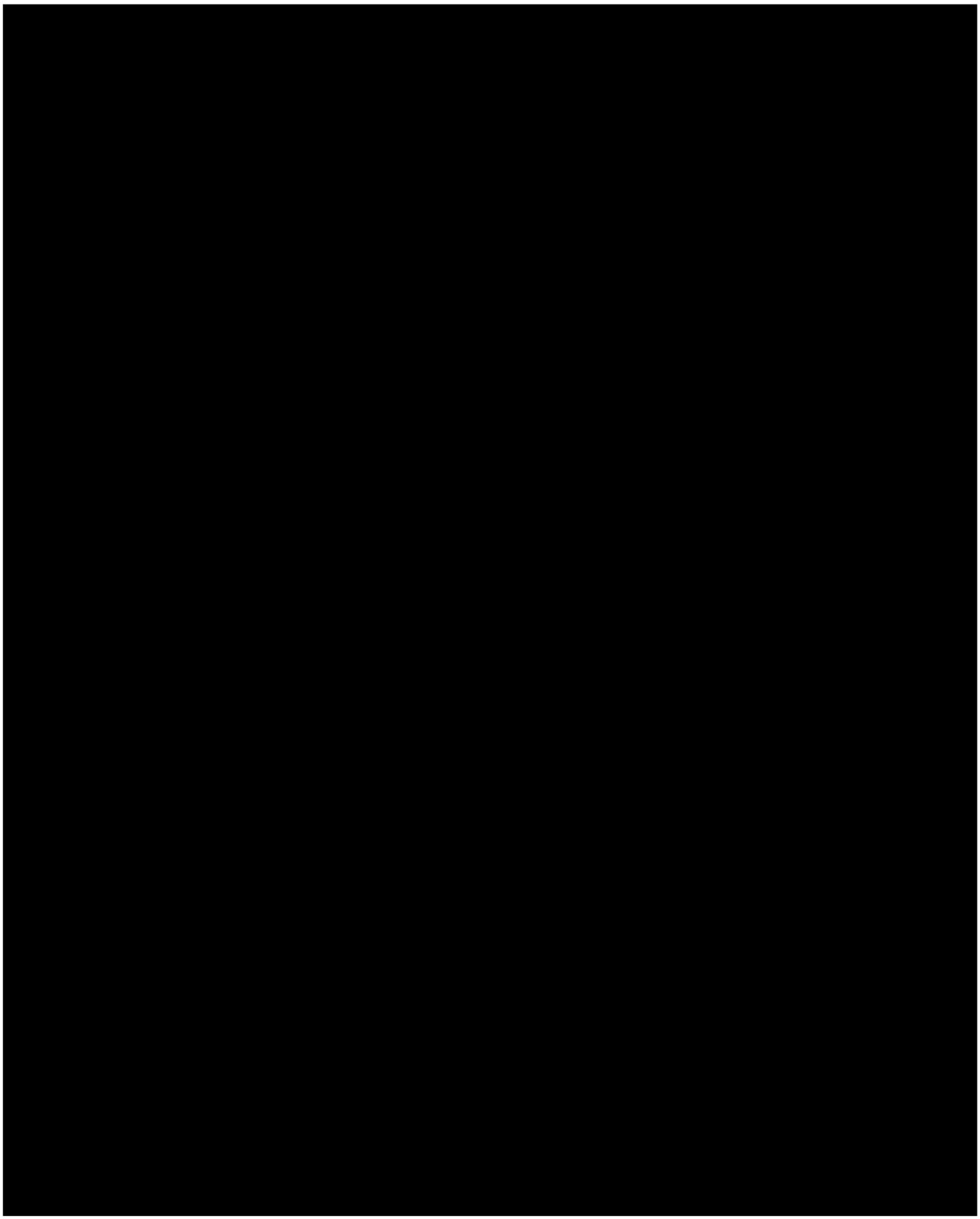
3.8.2 NIMS Training

The PHR Holdings LLC emergency management personnel will have received training in the following National Incident Management Training (NIMS) Courses. The courses are available online or locally available for scheduling via the FEMA National Incident Management System (NIMS) training website.

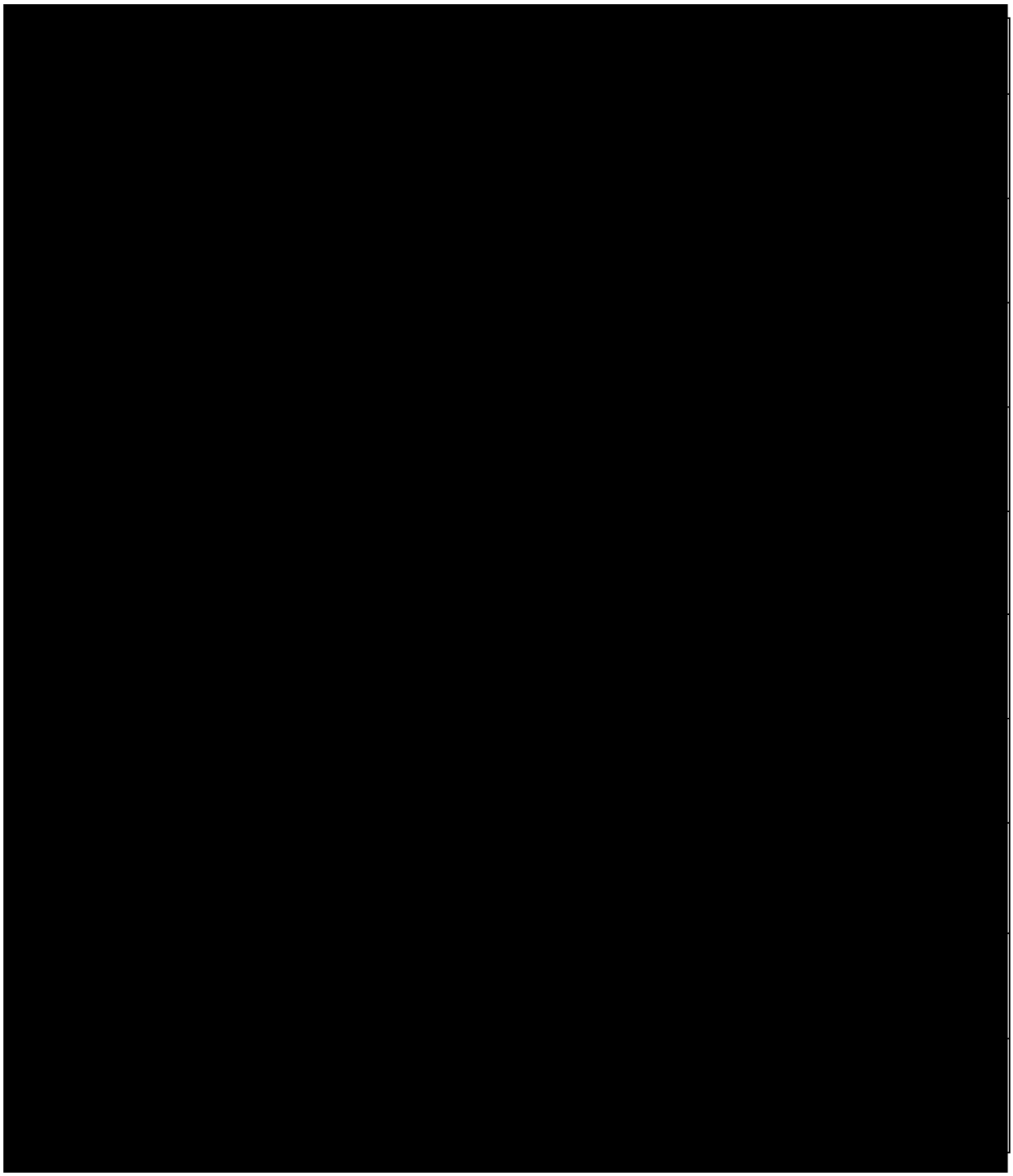
- ICS-100: Introduction to the Incident Command System
- ICS-200: ICS for Single Resources and Initial Action Incidents
- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

Certification will be maintained, and recertification will be performed per NIMS requirements. (Rev1)

3.9 Business Continuity Plan [§25.53(c)(4)(C)(v)]



BUSINESS PROCESS HARDWARE



4.0 Attachments

A. AMP-108 Incident Reporting Procedure

B. AMP108 Incident Notification and Reporting Matrix

C. SMP-02 Emergency Response Plan

D. PHR-WNTR Winter Weatherization Procedure

E. PHR-SUMMR Summer Weatherization Procedure

F. PHR-OP-108 Hurricane Preparedness Procedure

G. SMP-20 Pandemic Preparedness and Response Plan

H. CIP-003-8 Cyber Security Policy

I. CIP-003-8 Cyber Security Incident Response Plan

J. Business Continuity Plan

K. Return from Black Plant Procedure

A. AMP-108 Incident Reporting Procedure

Introduction

Purpose:

The purpose of this document is to outline the proper steps, analyses and reporting that must be accomplished in the event of an "Incident". These "Incidents" include, but are not limited to, the following.

Scope:

All NAES Personnel, All Site Personnel

Policy

① INTRODUCTION

A. Injury/Illness

B. Notice of Non-Compliance (NON), or Violation (NOV) from a regulatory authority.

C. Environmental Permit Exceedance

D. Permit Deviation

E. Release or Exposure

F. Reliability Compliance, NERC, FERC, Other

G. Fire, Bomb Threat, Natural Disaster, Media Interest Event

H. Property/Equipment Damage

I. Plant Upsets, Derates and/or Trips

J. Near Miss, Lessons Learned

K. Outside Agency Inspections [See Administrative Manual Program 107 (AMP-107) for procedures to follow during and after an Outside Agency Inspection.]

NOTE:

Specific notification, reporting and documentation requirements for a personal injury/illness are detailed in SMP-14, Accident and Injury/Illness Reporting.

Specific notification, reporting and documentation requirements for NERC, FERC and other reliability compliance are detailed in EOP-004.

Specific notification, reporting and documentation requirements for other emergencies are detailed in SMP-2, Emergency Response Procedure.

② DISCUSSION

This procedure ensures that incidents, abnormal events and near misses are not treated with complacency. Corrective actions and Lessons Learned shall be documented and implemented to help NAES prevent similar events from happening and ensuring continual improvement.

③ RESPONSIBILITIES

A. The Plant Manager or designee shall ensure uniform implementation and compliance with this program by all employees.

B. Plant employees shall immediately report all accidents, injuries, plant upset events, equipment damage, exceedances, deviations, spills, missed obligations, hazards, and near misses to their supervisor and assist as requested in investigations, critiques, analysis, and report preparations.

C. The Plant Manager is responsible for investigating all reported incidents, near-miss incidents or hazards, and assigning plant employees to assist in the investigation as appropriate.

D. The Plant Manager shall develop and maintain a site-specific emergency contact list to be followed for events that require notification of NAES management, client personnel, support services, outside regulatory agencies, and insurance providers.

NOTE:

The Emergency Contact list will be maintained in this procedure as Exhibit A, Incident Notification and Reporting Matrix.

E. The Operations Director shall confirm the receipt of incident notifications from the plant in accordance with Section 4 below and shall assist the Plant Manager with the internal distribution of incident information to ensure that internal notifications and reports are completed in accordance with Exhibit A, Incident Notification and Reporting Matrix.

F. The NAES Home Office/O&M Services shall administer and provide training and support on the NAES "Gensuite" Incident Reporting database, which serves as the NAES system for entering incident information and tracking and reviewing NAES fleet incident data.

G. Plant Managers shall identify at least one Lessons Learned from each RCA.

H. Plant Managers shall search this database for applicable lessons learned in advance of any high-risk evolution. High-risk evolution is defined as any activity, plant configuration, or condition where the plant is more susceptible to a safety, environmental, reliability compliance, derate, forced outage, or equipment damage event.

I. The O&M Services group shall issue to Operations Directors any Lessons Learned whose timely re-enforcement may prevent a reoccurrence of an adverse event.

J. Operations Directors shall reinforce these Lessons Learned throughout their organizations.

K. The Engineering Services group will examine all reported incidents to proactively identify and drive resolution of equipment performance, material condition and other technical issues by working collaboratively with the plants.

④ INCIDENT NOTIFICATION

The Operations Director must be notified as outlined in Appendix A. Notification attempts should be continued until there is confirmation that the message was received. Notification can be made by phone or email, provided confirmation of receipt is obtained. Leaving a phone message without receiving confirmation of receipt does not constitute notification.

For emergency situations, the Operations Director will take responsibility for providing the subsequent internal NAES notifications as appropriate.

For non-emergency situations, the Plant Manager and Operations Director will agree on how subsequent internal notifications will be made.

If a personal injury has occurred, regardless of the severity, follow the notification and documentation requirements of SMP-14, Accident and Injury Reporting. Follow-up investigations and reporting shall be accomplished in accordance with this procedure.

⑤ CALIFORNIA PLANTS

A. REPORTING INJURIES, INCIDENTS, AND EMERGENCIES TO THE CALIFORNIA PUBLIC UTILIITES COMMISSION (CPUC)

Plant Management whose facility generates 50 MW or greater are required to report, within 2 hours during working hours and 4 hours outside of working hours at 1-866-924- 9757, any incident which results in:

- A fatality or personal injury rising to the level of an in-patient hospitalization
- Are the subject of significant public attention or media coverage; or

- Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.

The facility should follow up with an email or fax update within 24-hours and a final report within 20 days to the CPUC.

- http://www.cpuc.ca.gov/emrep/ See excerpt from Appendix B to D.06 04 055.
- The report shall identify the time and date of the incident
- The time and date of the notice to the Commission
- The location of the incident
- Casualties which resulted from the incident,
- Identification of casualties and property damage.

Additionally, facilities must report, within 2 hours during working hours and 4 hours outside of working hours, incidents which involve the release of gas and

- A fatality or personal injury rising to the level of an in-patient hospitalization
- Are the subject of significant public attention or media coverage;
- Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.

The facility should follow up with full report on the designated form within 30 days to the CPUC. See excerpts from GO 112-E and CFR 49 § 191.9.

The report shall include a description of the utility's response to the incident and the measures the utility took to repair facilities and/or remedy any related problems on the system which may have contributed to the incident.

6 INCIDENT REPORTING

In addition to the incident notification step above, all incidents must be entered into the Incidents and Measurements (I&M) application in Gensuite. Entering an incident into Gensuite does NOT satisfy the incident notification requirements of section 4 above, because initial notification must be made by phone or email as required by Exhibit A. However, entering incident information into Gensuite does replace the need to enter incident data onto a hard copy report form.

If an incident spans more than one of the incident types below, data for each incident type should be recorded in separate I&M case files. The Plant Manager shall review all Incident Reports and assign responsibilities and required dates for the associated corrective actions.

Within 24 hours of an AMP-108/SMP-14 Incident occurring, the plant must enter the Event/Injury & Illness into the I&M module within Gensuite. Utilize the "multiple email CC" for those who need to be notified that are not set up in Gensuite. This same Incident Report can be provided to the plant owner's representatives as deemed appropriate. If the incident cannot be completed and closed within five (5) days due to on-going investigative actions, the plant shall manage the incident until it is closed.

Events/Injury & Illness Incidents should be completed as soon as practical but within two weeks of the incident. Status reports of the incident investigation and corrective actions must be provided weekly until the final report is issued.

AMP-108A investigations (RCA or Equivalent) shall be completed in accordance with the AMP-108A and submitted to the Operations Director for review and distribution. If a final RCA cannot be completed per AMP-108A in a timely manner the plant shall provide a timeline for the final submission that must be approved by the Operations Director.

NOTE:

The Plant Manager shall follow the plant-specific procedures and applicable permits and regulations for determining whether and when the incident is reportable to the regulatory agencies or local emergency responders.

7 LESSONS LEARNED

In addition to the data-gathering and analyses conducted in response to specific incidents or problems, the use of "Lessons Learned" helps to identify problems and make the organization aware of problems and actions.

Lessons Learned entry should be completed in Gensuite by the Plant for incidents and problems where knowledge was gained on how to perform better and/or prevent future problems.

Lessons Learned are required for all incidents or situations that result in an employee injury or environmental enforcement/Notices of Violation, unless the Operations Director approves otherwise.

The Plant may request assistance or input from NAES internal support groups when preparing Lessons Learned.

The Lessons Learned report is prepared by entering the appropriate information into the Gensuite Best Practices application. The Plant Manager will review and approve the

Lessons Learned report, stripping it of any confidential information that cannot be shared with other NAES plants. The Plant Manager will then inform the Operations Director via email that they have completed a Lessons Learned report in the Gensuite.

The NAES Home Office/O&M Services group shall review and, as appropriate, revise Lessons Learned events created by Plants in the Gensuite Best Practices application. Confidential information or references to the plant

name will be removed. When appropriate, review and comment from internal support groups will be done prior to publishing a Lessons Learned.

As Lessons Learned reports are received at NAES Plants, the Plant Manager will review the reports for applicability to the plant and determine and implement appropriate actions

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Attachments

Exhibit A

Revision Management

Revision History Log:

Revision #:	**Date:**	**Nature of Change:**	**Recorded By:**
R0	9/25/2019 10:09 AM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	5/14/2019 12:09 PM	New document	Kerby Duewel

PHR PEAKERS
Bacliff TX

Incident Notification and Reporting Matrix

Exhibit A

B. AMP108 Incident Notification and Reporting Matrix

In accordance with Section 3 & 4 of this procedure, incident notifications will be made to the Operations Director within the time frames listed below. Subsequent notifications to NAES internal groups and Owner representatives may be made by the Plant, Operations Director, provided all applicable notifications are completed as listed below.

Written incident reports and AMP-108a investigations must be completed and distributed as listed below.

PHR PEAKERS Bacliff TX			
	Rachal Havens		
	Rev	Issue Date	Last Review Date
		01 May 2020	01 Jan 23

[redacted]

[redacted]

* If Related to Safety ** If Related to Environmental *** If Related to NERC **** Near misses with the possibility of severe injury, death or major equipment damage may require an RCA.

C. SMP-02 Emergency Response Plan

Approved for use by:

_____

TABLE OF CONTENTS

Tables

Table 1. Emergency Organizational Telephone Numbers for Threat Control

APPENDICES

Appendix A: Facility Evacuation Route Diagram

Appendix B: Bomb Threat Checklist

Appendix C: Suspected Bomb/Sabotage Device Safety Precautions

Appendix D: Emergency Response Event Log

Appendix E: Emergency Response Call Record Form

Appendix F: Emergency Response Contact List

Appendix G: Actions for Suspected Sabotage Events

Appendix H: On-Site Hazardous Chemicals

References

None

Sub-Sections

None

DOCUMENT REVISION HISTORY

Rev	Rev Date	Description of Changes / Comments
1	01/23/23	Updated contacts list

1. Purpose

The purpose of this Safety Manual Procedure is to establish guidelines for responding to plant emergencies. The instructions in this SMP apply to all plant personnel, contractors, and any others who may be on the plant site during a fire, chemical release or spill, medical emergency, severe weather, or bomb threat.

2. Responsibilities

A. The Plant Manager has overall responsibility for the development, revision, and implementation of this plan and for assigning the associated responsibilities of Emergency Coordinator and Evacuation Coordinator to selected employees so that emergencies shall be effectively managed at all times of day or week.

B. The Emergency Coordinator is responsible for conducting fire and evacuation drills. The Emergency Coordinator is responsible for ensuring the Fire Department is notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan. The Emergency Coordinator shall designate an Evacuation Coordinator if the emergency requires personnel to evacuate.

C. The Control Room Operator will act as the Emergency Coordinator until relieved by management and shall account for all personnel on-site.

D. The Evacuation Coordinator shall maintain communication with the Emergency Coordinator and keep a head count of all evacuated personnel in order to report the status to the Emergency Coordinator. The Evacuation Coordinator may be any qualified plant employee.

E. All personnel will be trained on their work areas regarding fire routes, exits, the location and use of emergency equipment, and understanding and following this plan. All personnel who have contractors or visitors at the facility shall ensure that they are familiar with this plan.

3. Emergency Response Overview

This procedure provides immediate action steps to be used in a variety of emergencies. It is impossible to provide the exact steps to be followed in all emergencies and emergencies can involve several types of problems at once (a fire with corresponding injuries and a release of hazardous materials for example). Also, the sequence of actions in this procedure may not be the best sequence given the specific situation of an emergency. Steps in this procedure should be performed in an order that fits each situation, relying on sound judgment from plant operators.

A. General Referencing

Use the Emergency Response Call Record Form (Appendix E) to document all notifications made during an emergency, including all instructions given by parties contacted. The Emergency Response Contact List

(Appendix F) should be posted in the Control Room. Reporting guidelines for accidents and injuries, and for "near-miss" safety/environmental accidents, are covered later in this Safety Manual (SMP-14, Accident and Injury Reporting).

4. Hazardous Waste Operations and Emergency Response (HAZWOPER)

A. Spill Response Procedure

The following steps will be done immediately upon observation of a hazardous material spill. This procedure is intended to be a concise list of the basic emergency response steps and must be used in conjunction with Hazardous Material Spill Training and Follow-up section below.

1. *ENSURE that all personnel are evacuated from the spill area. Attend to any injured personnel.*

2. *EVACUATE the entire plant if it becomes necessary. Primary evacuation routes are shown in Appendix A. The Plant Manager or his designee may designate different evacuation routes at the time of the accident based on the information known at the time. Personnel may also be directed to go to a particular area of the plant to evacuate the area of the emergency if evacuation of the site is undesirable.*

3. *Additionally, if the emergency involves a toxic airborne release, the Plant Manager or his designee will EVALUATE the release and wind conditions and DETERMINE whether or not to evacuate plant personnel or "shelter-in-place". The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.*

If the gas cloud is moving in the direction of the control room, SHUT DOWN all air conditioning and ventilation systems. All personnel in the building should enter the control room area and all doors leading to this area should be closed.

4. *TAKE the necessary steps to MITIGATE the spill or release (e.g., SHUT OFF pumps, CLOSE valves, DISCONTINUE loading/unloading operations, etc.) if it safe to do so. If at all possible, STOP the spill at its source.*

5. *Immediately NOTIFY (Control Room Operator (or equivalent)) all personnel on-site of the spill/release.*

note

The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to the emergency.

6. *The Plant Manager (or a designee) will INSTRUCT plant personnel for further spill response measures. At any time the Plant Manager determines that the spill or any measure needed to prevent, contain, control, or clean up the spill is beyond the ability or training of the facility manpower and/or equipment, he shall immediately CONTACT outside hazardous materials emergency responders and remediation contractors to help control/clean up the spill.*

7. *If the spill or release is of a nature that may place the public at risk, INITIATE public warnings through the local emergency agencies listed on the Emergency Response Contact List in Appendix F.*

8. *The Plant Manager or his designee will MAINTAIN plant security and communications. In no case shall members of the press be admitted without the approval of Owner Representative. The Owner Representative or his designee will handle all public relations, press releases, and outside inquiries.*

9. *Make every reasonable effort to keep the spill on the plant property. In the event that the material has been released from the containment system, all necessary steps shall be taken to prevent it from entering storm sewers, public waters, or from escaping the facility property as long as it is safe to do so.*

10. *REFER to Safety Data Sheets (SDS) for proper use of personnel protective equipment.*

11. *BUILD berms, PLACE absorbent materials, PLUG storm drain inlets, culverts, and ditches to stop the flow of the spill. If necessary, PLUG culverts of streams and drainage ditches leaving the plant to stop the flow of the spill.*

NOTE

Plant personnel are only qualified to respond to a spill at the First Responder-Operations level. Response to the spill can involve operating equipment remotely or placing absorbents in the flow path, if done without placing employees in an unsafe condition.

12. *DOCUMENT all events in detail as soon as possible.*

13. *FOLLOW UP with all emergency response organizations, NAES headquarters, and the Owner Representative to ensure all reporting requirements have been met. REPORT all injuries in accordance with SMP-14, Injury Response & Reporting.*

B. Hazardous Material Spill Training and Follow-up

This section provides details and information to be used in preparation for and response to emergencies involving hazardous materials incidents in compliance with OSHA Hazardous Waste Operations and Emergency

Response Standard. This section is also to be used in conjunction with the facility Spill Prevention, Control, and Countermeasure Plan (SPCC) if the spill involves a fuel oil spill at the plant. The SPCC is required by EPA oil spill regulations 40 CFR 110 (which defines the discharge of oil) and 40 CFR 112.3 (which requires an SPCC). The SPCC is a spill prevention plan (that is, actions to be taken before the spill occurs), while this procedure is a spill response plan (that is, an action to be taken after the spill occurs).

Guidance pertaining to employee safety and training related to major hazardous materials releases and subsequent cleanup operations is contained in 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, referred to as HAZWOPER.

Overview of Hazardous Materials

The chemicals listed in Appendix J possess characteristics which could, if released in an uncontrolled manner and in sufficient quantity (above a specified threshold quantity), necessitate an emergency response under regulations specified by 29 CFR 1910.120.

Hazardous Materials Release Guidelines

Incidental releases can be controlled, contained, and cleaned up by employees in the immediate area. No outside or special assistance is required. Nuisance spills and minor releases which do not require immediate attention (due to lack of danger to employees) would be considered within the normal activities and training of the employee.

Incidental releases, for the purposes of operator training and response activities pertaining to the unintended release of hazardous materials on-site, may be approached, controlled, stopped, absorbed, neutralized, and cleaned up as long as plant personnel do not endanger themselves, others, or the environment in the process.

Personnel will carry out system operations at a safe distance to minimize the severity of the release. Remote control of valves and pumps will be employed as available to minimize the necessity of approaching the point of origin of an incidental release. Personnel will employ PPE, as needed and for which they are trained, to minimize potential for contact with the released materials. Clean up and hazardous material disposal techniques will be followed to ensure safe and efficient return to normal operations.

Recording and reporting of the release should be made promptly as described in the Notification section below. The Plant Manager, or a designee, shall review the situation and notification requirements to determine what outside organizations are required to be notified. As a minimum, the Owner Representative and NAES Headquarters Managers shall be notified. Refer to the table at Appendix H for Reportable/Threshold Quantities for any Extremely Hazardous Substances that are stored on-site. Proper decontamination of equipment and PPE shall be implemented after the cleanup is completed.

A hazardous materials emergency response is any response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an

occurrence which results, or is likely to result, in an uncontrolled release, which may cause high levels of exposure to toxic substances, or which poses danger to employees requiring immediate attention. No employee shall attempt to perform actions for which they have not been prepared, through training and experience, or for which they are not properly equipped. On-site and off-site training will be conducted both initially and on a continuing basis, as necessary, to ensure that personnel have the knowledge and experience to make a reasonable determination of the dangers when faced with a release situation.

If an uncontrolled release occurs resulting in an emergency, the designated off-site emergency response organizations shall be contacted. Refer to the Emergency Response Contact (Phone) List in Appendix F.

Refer to SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.

Resource Allocation

The Plant Manager has the authority to commit resources and funds for any spill remediation activity. He may delegate duties to other employees to expedite spill containment, clean-up, and disposal. In the event of a major spill or release, the Plant Manager will be in charge of the handling and cleanup of the toxic material. This resource would either be from the licensed spill cleanup company or a government agency (i.e., Ammonia supplier or other chemical supplier, Fire Department, or commercial response organization). The Plant Manager, or a designee, would remain in charge of the overall plant operation and coordination of spill response activities.

Emergency Response Training

Training shall be based on the duties and functions to be performed by each employee. Documentation of such training, including program agendas (with a copy of any outlines, overheads or handouts) and training rosters shall be maintained.

Facility response personnel are given instruction in emergency procedures related to a release of a hazardous substance or any hazardous chemical. Topics of instruction include emergency equipment (proper use, inspection and maintenance procedures), emergency systems (such as alarms/communications, key cut off systems for automatic feed systems), response procedures for fires, explosions, and spills (including spills to groundwater), and the organizational responsibilities of response personnel under the National Incident Management System.

First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They will take no further action beyond notifying the authorities of the

release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

1. *An understanding of what a hazardous substances are, and the risks associated with them in an incident*
2. *An understanding of the potential outcomes associated with an emergency created when hazardous substances are present*
3. *The ability to recognize the presence of hazardous substances in an emergency*
4. *An understanding of the role of the first responder awareness individual in the employer emergency response plan, including site security and control, and the DOT Emergency Response Guidebook*
5. *The ability to realize the need for additional resources, and to make the appropriate notifications to the communications center*

First Responder Operations Level

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the spill from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:

1. *Knowledge of the basic hazard and risk assessment techniques*
2. *Knowledge of how to select and use proper PPE provided to the first responder operational level*
3. *An understanding of basic hazardous materials terms*
4. *Knowledge of how to perform basic control, containment and/or confinement within the capabilities of the resources and PPE available within their unit*
5. *Knowledge of how to implement basic decontamination procedures*
6. *An understanding of the relevant standard operating and termination procedures*

Spill Response

Upon observation of a release of a hazardous material, chemical, or oil, employees shall immediately notify the Plant Manager with information concerning the spill, such as:

1. *Employee name*
2. *Location of spill*
3. *Type and quantity of material spilled*
4. *Actions and result of actions taken to mitigate the spill*
5. *Circumstances that caused the spill*

The Plant Manager, or his designee, will notify the necessary organizations and governmental agencies listed on the Emergency Contact (Phone) List in Appendix F. If necessary, the Plant Manager, or a designee, may contact outside Hazardous Materials Emergency Response organizations, and/or hazardous waste clean-up contractors to assist in the remediation of the spill.

The Plant Manager, or a designee, will also notify NAES management and the Owner Representative of all spills regardless of quantity and type as soon as practical.

The Plant Manager or his designee will provide the following information in the agency notification:

1. *The facility name, exact location, and phone number*
2. *The source and cause of the spill*
3. *The type (chemical name), volume of material released, and whether the material is classified as extremely hazardous*
4. *The volume estimated that reached navigable waters*
5. *The time, date, and duration of the spill*
6. *The medium of release (air, soil, water) and anticipated release movement*
7. *The action taken and anticipated*
8. *State whether evacuation is needed*
9. *The weather conditions, if applicable*
10. *Known health risks and required medical attention*
11. *Names of other parties contacted*

12. *Names of other parties to be contacted*

Keep notifications factual and do not speculate. Keep a record of all notifications made including all instructions given by parties contacted using the Emergency Response Call Record Form shown on Appendix E.

All inquiries from the media and the public should be referred to the Plant Manager, or his designee. Under no circumstances shall any plant personnel provide information to media or the general public concerning the spill. The Plant Manager will refer all inquiries to the Owner Representative.

For plants with fuel oil: Per 40 CFR 112.4, in the event that a discharge of 1,000 gallons of oil escapes the containment systems and enters into the navigable waters of the United States in a single spill event or a discharge of harmful quantities in two spill events within any twelve month period occurs, the Plant Manager will submit notification in writing to the EPA Regional Administrator:

note

The following information is required in the above notification. An asterisk (*) denotes information included in the SPCC plan.

1. *A complete copy of the SPCC plan*
2. *Name, phone number, and address of the facility (*)*
3. *Owner and operator name and address (*)*
4. *Date and year of initial facility operation (*)*
5. *Maximum storage capacity and average daily use (*)*
6. *Description of the facility (*)*
7. *Quantity and type of material spilled*
8. *Cause(s) of the spill(s)*
9. *Corrective actions*
10. *Additional preventative measures*
11. *Other pertinent information*

The plant staff shall investigate each incident that resulted in, or could reasonably have resulted in, a release of hazardous materials. An incident investigation shall be initiated as promptly as possible, but not later than 24 hours following the incident.

Managerial Responsibilities

Managerial responsibilities following a Hazmat release include determining the origin of the incident, investigating the effectiveness of this procedure, and evaluating the potential need for modifications to this procedure and plant personal response. NAES will be responsible for the implementation and communication of any changes to this procedure following an accidental release of aqueous ammonia. A summary shall be prepared at the conclusion of the investigation that includes at a minimum:

1. *Date of incident and investigation*
2. *A description of the incident*
3. *The factors that contributed to the incident*
4. *Any recommendations resulting from the investigation*

The managers of the facility will promptly address and resolve the investigation findings and recommendations. Resolutions and corrective actions shall be documented. The findings shall be reviewed with all affected personnel whose job tasks are affected by the findings. Investigation summaries shall be retained for five years in the plant environmental files.

Spill Clean-up and Disposal Procedure

Cleanup will be conducted to coordinate collection for isolation and disposal of contaminated products and materials, as appropriate. The categories listed below will be isolated and secured independently. These steps are necessary to reduce costs associated with clean up and disposal of contaminated materials.

1. *Recovered pure product for possible refining and reuse*
2. *Contaminated PPE for separate disposal*
3. *Oiled debris for separate disposal, i.e., wood products, beauty bark, etc.*
4. *Contaminated soils for possible incineration or separate disposal*
5. *Absorbent materials for incineration*

All residuals (recovered chemicals, contaminated clean up materials, and contaminated soil) resulting from spill remediation will be placed in containers that have been inspected for use as such.

Disposal of spilled material will meet all Federal and State regulations guiding the disposal of waste. Hazardous waste manifests will accompany containers of spill residues if the residue is determined by definitions of hazardous regulations to be hazardous. All required labeling and recordkeeping requirements will be followed.

Consult the applicable Material Safety Data Sheet for the substance to determine the appropriate cleanup procedures. Ensure all plant and contractor personnel assisting with the clean-up are aware of clean-up instructions and hazards listed on the SDS.

Refer to the facility Environmental instructions for further guidelines on the disposal of hazardous materials. Additionally, contact NAES headquarters and or the NAES Environmental Support Services (ESS) Division for assistance, if needed.

5. Fire Response Procedure

A. In the event of any fire, immediately report the fire to the Control Room Operator (CRO) via plant radio, cell phone, or other means. The report to the CRO shall include the following:

1. Your name
2. Nature of event – "Fire"
3. Location of the fire
4. Severity of the fire
5. Your planned action (e.g., evacuate or use fire extinguisher)

B. Incipient stage fire means a fire which is in the initial or beginning stage and which can be controlled or extinguished by one person with one portable fire extinguisher. If the fire is in the incipient stage and you have been properly trained, respond using the appropriate fire response equipment.

Note

If the fire progresses into a life-threatening event, immediately evacuate the area and notify the Control Room.

C. In the event that the fire is beyond the incipient stage and requires outside emergency response the CRO will contact 911 and sound the plant evacuation alarm.

D. To facilitate a quick response, the plant will designate a liaison to meet the Fire Response Service at the main entrance gate.

E. The areas on-site that have been designated as "muster areas" are listed and locations identified in Appendix A.

F. Upon hearing the fire evacuation alarm, all personnel shall evacuate to their primary evacuation area.

G. If necessary, a secondary evacuation area will be determined based upon site conditions and wind direction (as determined by the wind sock).

H. The Visitor Log Book from the Administration Building should be utilized to aid in accounting for all personnel.

I. Fire Evacuation Drills shall be conducted annually. At a minimum, the plant evacuation alarm shall be tested monthly. A written record of all drills shall be maintained. Any deficiencies observed shall be corrected.

6. Chemical Release/Spill Procedure

A. In the event of a chemical spill or release, immediately report it to the CRO via plant radio, cell phone, or other means. The report to the CRO shall include the following:

1. Your name
2. Nature of event – "chemical spill/release"
3. Location of the spill/release
4. Chemical identity and severity of the spill/release (estimate quantity)
5. Your planned action (ex. – evacuate or close remote valve)

B. Depending on the chemical and quantity involved, refer to section 4.B for steps necessary to respond to the spill.

7. Medical Emergencies

A. All injuries must be reported to your supervisor, no matter how small. First Aid/CPR trained personnel will be called to respond to minor first aid injuries.

B. If someone is seriously hurt, notify the CRO of the location of the injured person, nature of the injury, and any other important information related to the incident scene (ex. down power line next to injured person, chemical drum spill, etc.).

C. The CRO will contact 911 to alert emergency crews. An individual will be designated to meet emergency crews at the main entrance gate.

D. The CRO will make an announcement for all available First Aid/CPR trained personnel to report to the incident site. The First Aid/CPR trained personnel will administer first aid and any other measures within their training until the emergency crews arrive at the scene.

E. If the situation warrants the rescue of an unconscious or immobile person from a confined space or an elevated surface, or in a personal fall arrest system the CRO will be instructed to dial 911 and shall explain to emergency personnel the type, location, and hazards of the area.

8. Earthquakes, Tornados, and Severe Storm Emergencies

A. Earthquakes

1. TAKE cover under a desk or strong table or in a doorway, or sit or stand against an inside wall.
2. STAY away from windows, glass, bookcases, and outside doors.
3. DO NOT ATTEMPT to leave the building during a severe earthquake because of the hazards of downed power lines, falling debris from the building, etc.
4. MOVE away from buildings and utility wires.
5. WATCH for falling glass, electrical wires, poles or other debris.
6. CHECK for injuries and provide first aid as necessary.
7. CHECK for broken fuel lines and electrical faults. Isolate ruptures and faults as necessary.
8. CHECK for ruptures in systems containing hazardous chemicals. Isolate and contain spills.
9. PLACE the plant in a safe condition by shutting down equipment as necessary.
10. AVOID using the telephone except for emergency notification.

B. Tornados and Severe Storms

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast. The Plant Manager shall be notified and will try to be on-site to determine appropriate action. If the Plant Manager cannot be contacted, the CRO shall determine the appropriate action.

During severe thunderstorms, caution should be used during outside activities. If thunderstorms are in the immediate area of the plant, outside activities should be curtailed. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

The best protection in a tornado is usually an underground area. The best above ground areas in a building are:

1. Small interior rooms on the lowest floor without windows
2. Hallways on lowest floor away from outside doors and windows
3. Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.
4. Employees should be instructed to seek shelter areas as near as possible to inside walls, away from window areas. The CRO will make an announcement, and ensure that all

personnel have been warned of the outside conditions and to seek shelter inside in a safe location.

5. Get as close to the floor as possible and against sturdy machinery that will prevent portions of the roof, etc. from striking directly should they fall.

6. Do not evacuate the building until dangerous wind levels have subsided. An automobile is not a safe place to be in these circumstances.

7. If outside, seek safety in a low-lying depression such as a ditch or ravine.

8. An announcement shall be made indicating when the tornado or severe storm has passed.

9. An investigative team shall be designated to inspect all outside plant areas looking for damages, down power lines, and other potentially dangerous conditions.

9. Bomb Threats and Acts of Sabotage

A. Recognition

Understanding when an act of Sabotage is taking place or is about to take place is the first step towards preventing the subsequent injury and damage that the event can ultimately result in. A variety of tools are available to each NAES-managed facility meant to be used in conjunction with the Emergency Response Plan for any actual or potential Acts of Sabotage. These tools are available as Appendices to this procedure and are described below:

1. *Appendix B – Bomb Threat Checklist contains a checklist to be used when a bomb threat is received over the phone. This will help the receiver of the call obtain as much information as possible to help find the source.*

2. *Appendix C – Suspected Bomb/Sabotage Device Safety Precautions contains a list of precautions to be taken around unidentified packages, bombs, and suspected Sabotage devices.*

3. *Appendix I - Actions for Suspected Sabotage Events contains a list and description of potential Sabotage events as well as immediate actions to be taken in case of those types of events.*

The Plant Manager and <u>all</u> plant personnel and visitors shall maintain and enforce a strict site security policy to try and avoid any potential Sabotage events.

B. Response

Although many threats turn out to be hoaxes, it is very important to not dismiss the possibility of injury and damage and treat every situation seriously. When a bomb threat or discovery of a suspected Sabotage event is discovered, remember to not panic, remain calm, and follow the steps below:

1. For any abnormal events that could potentially be acts of Sabotage, refer to Appendix I – Actions for Suspected Sabotage Events.
2. When a call is received regarding a bomb threat or other act of Sabotage, refer to Appendix B – Bomb Threat Checklist while keeping the following items in mind:
    a. Engage the caller in as much conversation as possible and complete the checklist as the call progresses. If you are at a phone with caller ID, note the phone number of the caller.
    b. Keep the caller on the line as long as possible. Ask the caller to repeat the message even if you fully understood the message the first time. This will stall or cause a delay and allow the operator more time to react properly and involve the necessary personnel.
    c. If the caller does not give a location of the device, Sabotage method, or a time for the event, attempt to attain this information.
    d. Inform the caller that the building is occupied and that such an event (explosion or equipment destruction) would result in serious injury or death to innocent people.
    e. Be aware of the caller's voice and any background noises that may assist in identifying the location of the call. Record your findings on the checklist.
    f. Attempt to have the caller speak to a designated member of management.
    g. Do not hang up until the conversation ends and the caller hangs up.
3. Maintain security and communications. The Plant Manager (or designee) shall maintain plant security by restricting access so that only essential plant personnel and emergency personnel are admitted. The telephones should be manned if there are enough people on-site. Two-way radio communication should be kept free to be used as needed. In no case shall members of the press be admitted without the approval of the Owner Representative. The Owner Representative or his designee will handle all public relations, press releases, and outside inquiries.
4. Quickly search the plant area for suspicious, unusual, or foreign items (suspected bombs/Sabotage devices), and report any findings, but do not touch, move, jar, disturb,

or cover any suspicious items found. Observe the precautions listed in Appendix C. When police arrive, assist as necessary with a more detailed search of the plant.

5. If a suspicious item or bomb is located during the search, do the following:

   a. Isolate and DO NOT TOUCH OR DISTURB the item.

   b. Make notes of the location, appearance, colors, wires, etc.

   c. Contact the civil authorities and management in person.

   d. Do not use two-way radios or intercoms.

NOTE

At any time during these actions, the Plant Manager or on shift CRO can order the shutdown of equipment and evacuation if, in his judgment, there are strong indications of an immediate serious threat to the plant and/or its personnel.

6. If the plant is evacuated at any point, do not return until after the police have declared the site safe.

7. Upon completion of the threat, the management team shall assemble to critique the handling of the situation. Any recommendations for improvement must be incorporated into the policy and re-training conducted with the necessary personnel.

C. Communication

1. Report the event to the police as soon as possible. Provide the police with the following information:

   a. Your name

   b. Your location and phone number

   c. A detailed account of the event

   d. If the event is a threat received (via phone or other method), report the following:

      (1) Name of the initial recipient

      (2) Name of any employee threatened by the caller

      (3) Normal work location of any threatened employee

      (4) Time the bomb is supposed to explode/Sabotage event is to occur

(5) Exact location of the bomb or Sabotage device

(6) Outside appearance or description of the bomb or device

2. *Ensure that plant operating personnel are aware of the sabotage event on your facility and any sabotage event that would affect larger portions of the Interconnection.*

3. *When the police arrive at the site, the Plant Manager (or designee) shall brief the police as to:*

   a. Location of any emergency control valves or switches,

   b. Plant overall security status, and

   c. Any other information regarding the nature of the threat or event.

Note

Have all written records or notes of the threat available.

4. *Appropriate assistance should be requested from the police including site protection and personnel protection during an evacuation.*

5. *As soon as the threat has been at least tentatively identified and controlled, notify the Plant Manager, the Owners Representative, and the NAES Headquarters Operations Director. Applicable telephone numbers are listed below for quick access. Additional contact information is provided in Appendix F and should be utilized as necessary based on the circumstances of the event.*

6.

Emergency Organizational Telephone Numbers for Threat Control

Name	Title	Home Telephone Number	Email Address
Roger Lee	Plant Manager	727-488-0817	rlee@phrpeakers.com
JL Nelson	NAES Operations Director	252-532-7327	JL.Nelson@naes.com
Keith Feemster	Owners Representative	409-988-4624	keith.feemster@rocklandcapital.com

D. Reporting

It is essential that any incident involving a real or suspected threat of Sabotage be reported as soon as reasonably possible.

Distribution of this information should be initiated by the immediate submission of an Electrical Emergency Incident and Disturbance Report (Form OE-417) to the US Department of Energy according to the OE-417 Form instructions (http://www.oe.netl.doe.gov/oe417.aspx). The Form OE-417 consists of an Alert Notice (Schedule 1) and a Narrative Description (Schedule 2) which must be submitted within the time frames described below (and as specified in the top portion of the Alert Notice).

NOTE:

NAES NERC procedure RCP-EOP-004-ATT-A contains reporting guidelines for reporting damage or destruction of the Facility that results from actual or suspected intentional human action, as well as any physical threats to the Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. Please refer to RCP-NERC-EOP-004-ATT-A for NERC Event Reporting guidelines for these instances.

10. Training

A. All plant employees shall receive training on emergency response procedures on an annual basis.

B. All newly hired employees shall receive this training during orientation.

C. Contract employees must receive this training as integrated into the contractor orientation and training.

NOTE

In addition to the training, the appropriate number of radios shall be determined and issued to the Contractor Supervisor/Foreman.

D. All plant employees training must include at a minimum the following:

1. Familiarization with this plan
2. Any Hazmat Training that may be applicable
3. The use of any firefighting equipment available
4. Any special items or needs that may rise

E. All contract employees training must include the following:

1. A general overview of this plan
2. Any special items or needs that may arise during the course of their stay on-site

F. A written record must be maintained of all plant employees and contract employees who have received the training.

Facility Evacuation Route Diagram

Bomb Threat Checklist

Instructions: Have someone else call police (911) and keep caller on the line. Listen; do not interrupt the caller except to ask:

1. *When will it go off?*____
2. *Where is it planted?*___
3. *What floor is it on?*____
4. *What kind of bomb is it?*_____
5. *What does it look like?*_
6. *Why are you doing this?*
7. *Who are you?*__
8. *Where are you?*

Call received by:_____ Time of Call___

Date___ Time of Hang-up_____

Description of Caller: ☐ Male ☐ Female ☐ Adult ☐ Juvenile _____ App. Age

Voice Characteristics	**Speech**	**Language**
☐ Loud ☐ Soft	☐ Fast ☐ Slow	☐ Excellent ☐ Good
☐ High Pitch ☐ Deep	☐ Distinct ☐ Distorted	☐ Fair ☐ Poor
☐ Pleasant ☐ Raspy	☐ Stutter ☐ Nasal	☐ Four ☐ Other
☐ Intoxicated	☐ Slurred ☐ Precise	Use of Certain Words or Phases:
☐ Other	☐ Other	
Accent	**Manner**	**Background Noises**
☐ Local ☐ Not Local	☐ Calm ☐ Angry	☐ Office ☐ Street
☐ Foreign ☐ Regional	☐ Rational ☐ Irrational	☐ Machines ☐ Traffic

☐ Race ☐ Other Explain:	☐ Coherent ☐ Incoherent ☐ Deliberate ☐ Emotional ☐ Righteous ☐ Laughing Is voice familiar? Sounds like _____	☐ Factory ☐ Airplanes ☐ Machines ☐ Trains ☐ Bedlam ☐ Voices ☐ Animals ☐ Music ☐ Quiet ☐ Party ☐ Mixed ☐ Atmosphere

Action to take immediately after call:

1. Notify plant management.
2. Notify Owner's Representative.
3. Notify NAES Headquarters' Management.
4 Refer to RCP-NERC-EOP-004-ATT-A for NERC related reporting
5. Forward a copy of this to parties above ASAP.
6. Write exact statement or caller below:

_____

_____

Suspected Bomb/Sabotage Device Safety Precautions

The safety precautions below are designed to acquaint you with dangers inherent in the search, discovery, and handling of “suspected bombs” or “suspected Sabotage devices”.

While some of the following safety precautions may seem elementary, do not dismiss them as unimportant nor take them for granted, because adequate knowledge of these precautionary provisions may save your life or the lives of other plant operators and visitors.

1. Do not touch a suspected object.
2. *Do not shake, shock, or jar a suspected Bomb/Device.*

Warning

The presence of nearby equipment/storage tanks that could present secondary hazards in the event of explosion or other Sabotage event.

3. *Do not use radio equipment near the Bomb/Device to transmit messages.*
4. *Do not move light switches.*
5. *Do not smoke.*
6. *Do not accept the contents of any container as bona fide, simply because it was delivered by routine means.*
7. *Do not accept container markings and/or appearance as sole evidence of their contents' identification and legitimacy.*
8. *Do not cover a suspected bomb/device.*
9. *Do not carry a suspected bomb/device.*
10. *Do not assume that a suspected bomb/device is of a specific (high explosive or incendiary) type.*
11. *Do not open any suspicious container or object.*
12. *Do not cut a string, cord, or wire on a suspicious container or object.*
13. *Do not cut or remove the wrapper on a suspicious object or container.*
14. *Do not unscrew the cover, move the latch or hook on the cover, or raise or remove the cover of a suspicious container.*
15. *Do not change the position of a suspicious container or object.*
16. *Do not place a suspicious container or object into water.*

Emergency Response Event Log

Emergency Description:

_____

_____

Date and Time of Emergency:_____

Note: Log all events associated with the emergency chronologically. Keep logs factual and concise.

Emergency Response Call Record Form

Emergency Description:

Date and Time of Emergency:

Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact

Description of Correspondence:

PHR PEAKERS Bacliff TX			
	Rachal Havens		
	Rev	Issue Date	Last Review Date
		01 May 2020	01 Jan 23

Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact

Description of Correspondence:

Emergency Response Contact List

Contacts should be made in the following order whenever possible. However, if contact cannot be made after two attempts, move on to the next level.

Event	Contact Title	Phone 1	Phone 2	Comment
Sabotage/Bomb Threat/Event	Local Emergency Services	911		
All	Plant Manager	727-488-0817		
All	NAES Operations Director	252-532-7327		

NOTE:

NERC RCP-EOP-004-ATT-A Table 2 – Plant Manager and Law Enforcement Contact Information is required to contain Local Law Enforcement contact information, Plant Manager contact information, and specific NERC reporting contacts. It is not necessary to maintain two separate contact lists if EOP-004-ATT-A is used by the facility.

Actions for Suspected Sabotage Events

All personnel should pay close attention to the events described in the table below. For all situations, perform the following actions along with the supplementary actions and then refer back to Section 9:

1. **Immediately contact the Plant Manager (or designee in his/her absence)**
2. **Ensure that all on duty personnel are alerted to the possibility of a sabotage event.**
3. **Document as many details about the situation as possible. Note times, events, and descriptions as applicable to the situation.**
4. **If appropriate, notify law enforcement and parties of the interconnection in accordance with Section 9C.**

Event	Event Definition	Supplementary Actions
Abnormal Behavior of Personnel	Persons with disgruntled, violent, or threatening behavior. Persons with a history of health or financial problems or any other reason that may cause odd behavior.	• Stay calm and don't aggravate the situation • If they are receptive, try to calm the person down. Explain that you wish to help.

Event	Event Definition	Supplementary Actions
Unfamiliar/Unescorted Visitors	Anyone who is on-site without permission and without an escort	• Provide escort to a secure area of the facility • Gather information as to the purpose of their visit
Unexplained Packages or Shipments	Any delivery with questionable labeling or from an unknown shipping company. Any package of suspicious origins that cannot be identified.	• DO NOT DISTURB THE OBJECT • Refer to Appendix C - Suspected Bomb/Sabotage Device Safety Precautions
Abandoned Vehicles	Vehicles on-site or near the facility that are not recognized and have no purpose being there	• Inquire as to the owner of the vehicle • Record a description of the vehicle and its license plate number

Event	Event Definition	Supplementary Actions
Abnormal Observations	Observation of any suspicious persons taking pictures and/or notes around the facility.	• Attempt to identify the person and their intent • Take note of identifying details about the person and their method of transportation.
Equipment Misuse/Abuse	Unauthorized changes to equipment that affect functionality or deliberate efforts to damage or destroy equipment.	• Coordinate with the Plant Manager and the Control Room to place the facility in a safe condition if the affected equipment cannot be isolated from the system. • Determine the extent of which the equipment was misused/abused
Attempted Intrusion (Physical)	A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success.	• Inform all personnel of the event and conduct a search of the area for anything or anyone that appears to be suspicious. • Secure all sensitive plant areas through any available means
Attempted Intrusion (Cyber)	A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success.	• Record all activity that led you to determine the event was an attempted intrusion • Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.

Event	Event Definition	• Supplementary Actions
Cyber and/or Communication Disruptions	Failure, degradation of functionality, or unauthorized access or use of facilities used for the exchange of voice or data.	• Record details of any suspicious events that led up to the disruption • Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.
Information Theft and/or Loss of Sensitive Plant Information	Unauthorized removal or loss of sensitive information.	• Record details about the theft including the last time you saw or used the data or documentation in question • Contact appropriate entities listed on Appendix F – Emergency Response Contact List • For Critical Facilities, refer to facility CIP policies and procedures.
Unauthorized Modification of Software or Data	Unauthorized addition or modification of software or data associated with the proper operation of cyber assets.	• Record details regarding the modification • Ensure any affected systems are in a safe condition and close the affected programs. • For Critical Facilities, refer to facility CIP policies and procedures.
Multiple breaker operations in your switchyard and adjacent Transmission Owners switchyard	Multi Site Sabotage	• Inform operating personnel • Have operating personnel inform others in the Interconnection. • Call FBI

Event	Event Definition	• Supplementary Actions
Cyber systems for parties in the interconnection start showing equipment operation that has not physically occurred.	Multi Site Sabotage	• Inform operating personnel • Have operating personnel inform others in the Interconnection. • Call FBI

On-Site Hazardous Chemicals

Chemical Name, Description	Threshold Qty, Pure Product	Threshold Qty Solution in Use	Stored Qty On-site
Aqueous Ammonia (10-30% solution)	100 lbs.	~13 gallons	0 gallons
Diesel Fuel Oil (No. 2 grade)	1,000 gallons	1,000 gallons	500 gallons
Sulfuric Acid (93% solution)	1,000 lbs.	~65 gallons	317 gallons
Sodium Hydroxide (50% solution)	1,000 lbs.	~79 gallons	0 gallons

D. PHR-WNTR Winter Weatherization Procedure

PH Robinson Peakers

Standard Operation Procedure

Plant Winterization

Rev	Date	Originator	Checked	Approved
0	03/8/2021	RON DENNISON	RLEE	RLee
1	11/5/2021	WOODY DEBENEDICTIS	RLEE	RLee
2	01/31/2022	WOODY DEBENEDICTIS	RLEE	RLee
3	10/10/2022	WOODY DEBENEDICTIS	RLEE	RLee
4				

TABLE OF CONTENTS

PURPOSE

1.0 The Winterization procedure will provide guidance for protection of equipment during severe weather conditions.

2.0 SCOPE

2.1 This SOP provides instructions to plant personnel for securing plant equipment. Detailed instructions in Appendix A, B, C, D, E, F, G, and H are to be completed to ensure proper procedures are followed to maintain plant staff and equipment integrity and safety. Equipment modifications and operating experience will necessitate additions, and deletions to these procedures.

2.2 It is acknowledged that this document does not cover all plant or system operating scenarios. This document has been developed to assist plant personnel with the knowledge to properly secure the plant and operate during severe weather conditions. This document does not take the place of sound operating practices or knowledge gained through experience.

3.0 REFERENCE

3.1 Plant P. & I.D. drawings.

3.1.1 Found on the PH Robinson Server under G Drive → Operations → PHR Training → Drawings and Specifications

3.2 Winterization Checklists, Appendixes, and Logs

3.2.1 Found on the PH Robinson Server under G Drive → PHR Weatherization Plans → Winter Weatherization

4.0 DEFINITIONS

4.1 Extreme Weather Condition – Weather conditions that warrant protection of equipment during conditions that can damage equipment, cause failure, or prevent the plant from dispatch.

4.2 Freeze Watch – PM beginning October 1 of every year and starts the winterization preparation. During this time the items on Appendix A will be installed/staged and tested complete by November 1 using Freeze Stage 0 Winterization Checklist Appendix A.

4.3 Freeze Stage 0 – Any condition where temperatures will fall below 40°F in conjunction with impending deterioration of overall weather conditions.

Freeze Stage 0 will automatically be enacted annually beginning November 1 and ending March 31. When in Freeze Stage 0 with deteriorating conditions that could lead to a change in Freeze Staging, the CRO will begin a detailed watch utilizing the NOAA weather tracker. This

check will be conducted every 4 hours by the CRO and logged in the "Weather Watch Checklist" Appendix E. This will provide ample time to prepare for rapidly changing weather conditions.

4.4 Freeze Stage 1 – Any condition where temperatures will reach 35°F (ambient) or below. Once Freeze Stage 1 has been enacted, Appendix B will be completed and a rounds keeping log will be used to monitor parameters related to Freeze Stage 1. The rounds in Appendix D will be issued by the CRO and will be completed by the OMT every 4 hours.

4.5 Freeze Stage 2 – Any condition where temperatures will reach 32°F (ambient) or below. Once Freeze Stage 2 has been enacted, Appendix C will be completed and a rounds keeping log will be used to monitor parameters related to Freeze Stage 2. The rounds in Appendix D will be issued by the CRO and will be completed by the OMT every hour. During this stage the Plant Manager can choose to enact increased staffing using plant or contractor staffing, or both, using Appendix H.

4.6 Freeze Stage 3 – Any condition where temperatures will reach 25°F (ambient) or below. Once Freeze Stage 3 has been enacted, the Freeze Stage 2 rounds log in Appendix D will be completed along with the Freeze Stage 3 rounds log hourly to monitor Purge Valve operation during Freeze Stage 3. During this stage the plant will fill out Appendix H and will have increased staffing using plant or contractor staff, or both.

5.0 RESPONSIBILITIES

5.1 The Plant Manager is responsible for the effective implementation of this procedure.

5.2 The Plant Manager is responsible for ensuring that plant personnel are properly trained and qualified, as required, to implement this procedure.

5.3 The Control Room Operator (CRO) is responsible for assigning a properly trained and qualified Operations and Maintenance Technician (OMT) to implement this procedure in a safe and effective manner. The Control Room Operator (CRO) is responsible for completing and verifying all

applicable checklists.

6.0 LIMITS AND PRECAUTIONS

6.1 Environmental – Store fuel for heaters in proper containers and lockers.

6.2 Health & Safety – Be aware of hot surfaces. Always wear proper PPE equipment when working on or around plant equipment. Ice/Snow on some areas may cause slippery surfaces.

6.3 Regulatory - There are no Regulatory requirements associated with this procedure.

6.4 Operating Temperature Limits – GE does not provide a lowest acceptable operating temperature. Per a third party engineered study performed by TG Advisors, the six units at PHR were deemed to be operable to a low temperature of 9°F.

7.0 PROCEDURE

7.1 By November 1st have the following winterization preparations completed for Freeze Stage 0:

Complete the following IAW Appendix A "Freeze Stage 0 Winterization Checklist"

7.1.1 Compressor Bleed Valve insulation verified to be intact.

7.1.2 Fuel Gas Bypass Valve insulation verified to be intact.

7.1.3 Hydraulic Oil Solenoid and Purge Valve insulation and heating installed.

7.1.4 Scaffolding and windbreak shelter installed around purge valve area.

7.1.5 480 volt portable heaters tested for proper operation.

a) Ensure heater is not an open flame heater.
b) Plug in portable heater into 480 volt receptacle.
c) Turn on portable heater to medium heat.
d) Wait 5 minutes and check for warm air from heater ensuring not to touch the heater.
e) Turn off, unplug, and stage heater for future use.

7.1.6 Gas Turbine Fuel Gas Building heaters tested for proper operation.

a) Turn on heater breaker.
b) Turn thermostat to max, wait 5 minutes, then check for heat coming from heaters ensuring not to touch the heater.
c) Return thermostat to 70°F.

7.1.7 Demineralized (Demin) Water Tank drained.

a) Drain tank by opening the bottom drain valve.
b) Leave drain valve open
c) Open pipe coupling to the pump to allow all of the water to drain from the system.

7.1.8 Complete Appendix A Freeze Stage 0 Winterization Checklist Monthly.

7.1.9 Complete Appendix I Weather Preparedness Supplies Checklist Monthly.

7.2 Freeze Stage 1 and 2 Rounds are located on the server under, G Drive → PHR Weatherization Plans → Winter Weatherization → PHR Freeze Stage 0 Winterization Checklist Appendix A.

Complete the following IAW Appendix D "Freeze Stage 1 and 2 Rounds"

7.2.1 CRO/OMT will ensure that all plant operators are trained in the operation and location of plant equipment listed in the procedure.

7.3 Coordinate with CRO on test procedure: The following will be performed with assistance from the OMT during Freeze Stage 1 conditions.

Complete the following IAW Appendix B "Freeze Stage 1 Winterization Checklist"

7.3.1 Bleed Valve Test

a) Perform Compressor Bleed Valve Test when unit is Offline, document in logbook.
b) OMT - Connect instrument air to inlet hose connection for Bleed Valves.
c) Select Unit to be tested on DCS
d) Select Maintenance Page from DCS
e) Select and change operating mode from "Auto" to "Off". No tests will initiate with the unit in "Auto"
f) CRO – Communicate to OMT to line up for supply air to CBV being tested.
g) CRO will initiate "Test On" on the DCS. OMT/CRO will verify in the field and DCS that both CBVs operate. Fully Closed/Fully Open. Stroke valves several times to verify proper operation.
h) Positive results – Fully open (Green Indication) Closed (Red Indication).

7.3.2 Purge Valve Test

a) Perform Purge Valve Test Only When Unit Is Offline.
b) Using the HMI Select the GAS FUEL Screen.

c) Using the PURGE SYSTEM TEST select ON.
d) The Purge Valves VA13-1 & VA13-2 should uniformly stroke fully open in less than 30 seconds
e) Using the PURGE SYSTEM TEST select OFF.
f) The Purge Valves VA13-1 & VA13-2 should uniformly stroke fully shut in less than 30 seconds
g) Repeat test 3 times.
h) Leave PURGE SYSTEM TEST in the OFF position when complete, VA13-1 & VA13-2 are shut.
i) Do a Master Reset and check to ensure all alarms & faults associated with this Test are reset.
j) Begin troubleshooting if valves do not stroke uniformly open & close in less than 30 seconds.
k) Select "Test Off"
l) Return unit from "Off" to "Auto"
m) Perform a "Master Reset" – Verify all alarms are reset.

7.4 Outside Plant Equipment Protection During Freeze Stage 1:

Complete the following IAW Appendix B "Freeze Stage 1 Winterization Checklist"

7.4.1 Purge Valve Shelter/Heat
a) Check shelter and insulation integrity.
b) Plug in portable heater into 480 volt receptacle.
c) Place heater in Purge Valve shelter.
c) Turn on portable heater to medium heat.
d) Wait 5 minutes and check for warm air from heater ensuring not to touch the heater.

7.4.2 Compressor Bleed Valve Insulation
a) Check insulation integrity and add additional insulation if necessary.

7.4.3 Fuel Gas Bypass Valve Insulation
a) Check insulation integrity and add additional insulation if necessary.

7.4.4 Gas Turbine Fuel Gas Building/Heat
a) Turn on heater breaker in the Fuel Gas Building.
b) Turn thermostat to max, wait 5 minutes, then check for heat coming from heaters ensuring not to touch the heater.
c) Return thermostat to 70°F.

d) Check insulation integrity of the piping and add additional insulation if necessary.

7.4.5 Lube Oil Cooler Spray Protection

a) Drain system to prevent freeze damage.
a) Block in supply water to spray system.
b) Drain water from filter/spray header.
c) Notify control room to document on board Unit # isolated from supply.

7.4.6 Plant Eye Wash Station

a) Open eye wash handle to allow enough water flow to keep it from freezing.

7.4.7 Open In-line moisture separators drain valve enough to ensure proper drainage of any accumulated liquid in bowl.

7.5 Outside Plant Equipment Protection During Freeze Stage 2

Complete the following IAW Appendix C "Freeze Stage 2 Winterization Checklist"

7.5.1 Winterization Rounds

a) Increase winterizations Rounds frequency to hourly.

7.5.2 Bellmouth Viewing Window

a) Inspect in bell mouth viewing window with a light source hourly to check for icing as listed in Appendix D Freeze Stage 2 Rounds.

7.5.3 Eyewash Valves and Piping

a) Turn off all water supply to the eyewash stations.
b) Open eyewash handles.
c) Open eyewash station valves.
d) Disconnect coupling at the base of the eyewash station.
e) Verify all water drained from eyewash stations.

7.6 Staffing During Freeze Stage 2

7.6.1 During Freeze Stage 2 increased staffing is at the discretion of the Plant Manager. If staffing is increased Appendix H will be filled out.

7.6.2 All plant staff will be notified when entering Freeze Stage 2 of the possibility of increased staffing requirements. If implemented by

the Plant Manager increased staff from plant or contractors, or both, may be brought onsite.

a) Additional plant staff include OMTs, CROs, and I&E personnel.
b) Additional outside contractors include scaffolders, electrical, and mechanical technicians.

7.7 Outside Plant Equipment Testing During Freeze Stage 3

7.7.1 Appendix D Rounds

a) Perform hourly Purge Valve testing on all units in accordance with section 7.3.2.

b) Complete Freeze Stage 3 Rounds in Appendix D hourly

7.8 Staffing During Freeze Stage 3

7.8.1 During Freeze Stage 3 staffing from plant or contractor, or both, will be increased and Appendix H will be filled out.

8.0 RECORDS

8.1 Appendix A Freeze Stage 0 Winterization Checklist

8.2 Appendix B Freeze Stage 1 Winterization Checklist

8.3 Appendix C Freeze Stage 2 Winterization Checklist

8.4 Appendix D Freeze Stage 1, 2, and 3 Rounds

8.5 Appendix E Weather Watch Checklist

8.6 Appendix F PHR Winter Weather Emergency Contact List

8.7 Appendix G PHR Winter Weatherization Training Sign In Sheet

8.8 Appendix H Increased Staffing for Weather

8.9 Appendix I Supplies List

9.0 TRAINING REQUIREMENTS

9.1 Personnel having responsibility assignments associated with this procedure shall be properly trained. All training shall be appropriately documented and completed annually by November 1st.

9.1.1 Once training is completed all attending personnel will sign and date Appendix G PHR Winter Weatherization Training Sign In Sheet.

Freeze Stage 1 Winterization Checklist
Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed Monthly beginning November 1st of every year through March. Each component will be installed and verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

Check	Signature	Date
Hydraulic Oil Solenoid and Purge Valve Heating/Insulation Installed		
Scaffolding Windbreak Installed		
CBV Insulation Verified Intact		
Fuel Gas Bypass Valve Insulation Verified Intact		
480V Heater Staged and Tested		
Gas House Heaters Tested		
Demin Tank Drained		

Note

Freeze Stage 1 Winterization Checklist
Appendix B

PH Robinson Peakers 5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT1

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Scaffold Windbreak Inspection		
Hydraulic Oil Solenoid and Purge Valve Heating Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
Fuel Gas Bypass Valve Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Freeze Stage 1 Winterization Checklist
Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT2

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Scaffold Windbreak Inspection		
Hydraulic Oil Solenoid and Purge Valve Heating Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
Fuel Gas Bypass Valve Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Freeze Stage 1 Winterization Checklist
Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT3

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Scaffold Windbreak Inspection		
Hydraulic Oil Solenoid and Purge Valve Heating Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
Fuel Gas Bypass Valve Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes