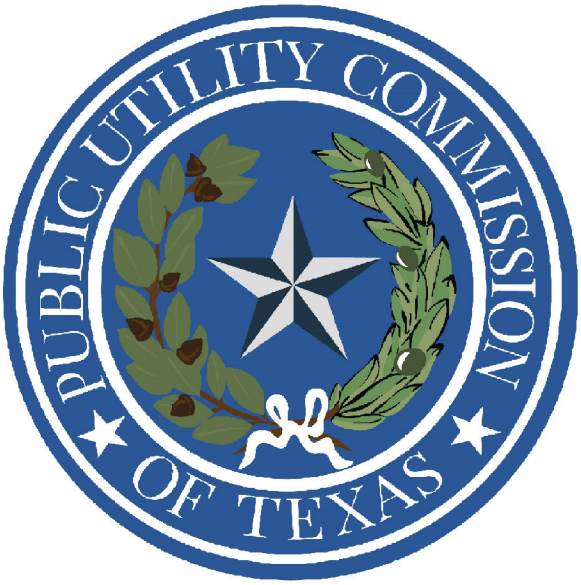

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Ector County Generation, LLC
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

EXECUTIVE SUMMARY

For the PUC of Texas

Submitted to:

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

Date: 14 March 2023 (Rev2)

EXECUTIVE SUMMARY

1.0 Introduction (Rev2)

The Ector County Generation, LLC ("Ector County" or "ECG") 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. Ector County 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. (Rev2) This Executive Summary is a description of the contents and policies of the Ector County 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. (Rev2)

2.0 Description of EOP Contents and Policies (Rev2)

The Ector County (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 appendices and checklists have been provided as attachments to the EOP.

3.0 Record of Submittal of EOP

The Ector County EOP, including subsequent revisions, has been distributed to the following agencies and local jurisdictions:

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)

Odessa Fire Rescue
1100 W. 2nd Street
Odessa, TX 79763
Jcotton2@odessa.gov

4.0 Annual Update Process (Rev2)

Following the initial submittal of the EOP (Rev0) dated April 2022, and subsequent revision dated July 17, 2022 (Rev1), annual updates will be submitted as required. Annual EOP updates will include changes that were made during the previous calendar year that materially affect Ector County's 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.

5.0 Summary of EOP Revisions (Rev2)

Revisions to the Executive Summary and EOP have been indicated using revision labeling (i.e., Rev2) throughout.

5.1 Material Changes Made to EOP since last Version (Rev2)

Ector County Generation, LLC is submitting a revised Emergency Operations Plan (Rev2), along with this Executive Summary, dated March 14, 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., Rev2) throughout the EOP:

Section	Rev2 EOP Revisions	Page
18.0	Business Continuity Plan; Distinct Business Continuity Plan has been added.	11
20.0	Plan for Identifying Weather-Related Hazards and EOP Activation [16 TAC §25.53(d)(5)]; If a weather-related hazard is identified by ERCOT that is expected to directly affect the Ector County region, the Ector County Plant Manager will activate this EOP...	12

6.0 EOP Contents and Rule Requirements by Section and Page (Rev2)

Section	Section Heading	16 TAC 25.53 Requirement	Page
1.0	Introduction	§25.53(d)(1)(A)	4
3.0	Applicability	§25.53(d)(1)(A)	4
8.0	Plan Maintenance Responsibilities	§25.53(d)(1)(B)	6
11.0	Revision Control	§25.53(d)(1)(C)	7
11.1	Revision Block with Approval Dates	§25.53(d)(1)(C)	7
11.2	Revision Replacement and Succession	§25.53(d)(1)(D)	7
12.0	Record of Distribution	§25.53(c)(4)(A)	7
13.0	Emergency Contacts	§25.53(c)(4)(B)	8
14.0	Common Operational Functions	§25.53(d)	8

15.0	Reporting Requirements	§25.53(g)	9
16.0	Drills	§25.53(f)	9
17.0	Communication Plan	§25.53(d)(2)	10
18.0	Business Continuity Plan	[§25.53(c)(4)(C)(v)	11
19.0	Pre-Identified Supplies for Emergency Response	§25.53(d)(3)	12
20.0	Emergency Event Staffing	§25.53(d)(4)	13
21.0	Plan for Identifying Weather-Related Hazards and EOP Activation	§ 25.53(d)(5)	13
22.0	Weather Emergency Annex	§25.53(e)(2)(A)	14
22.3	Operations During Cold or Hot Weather Emergency	§25.53(e)(2)(A)(i)	16
22.4	Cold Weather and Hot Weather Checklists	§25.53(e)(2)(A)(iii)	16
22.5	Alternative Fuels and Fuel Switching	§25.53 (e)(2)(A)(ii)	16
24.0	Water Shortage Annex	§25.53(e)(2)(B)	18
25.0	Restoration of Service Annex	§25.53(e)(2)(C)	18
26.0	Wildfire Response Annex	§25.53(e)(1)(D)	18
27.0	Pandemic and Epidemic Annex	§25.53(e)(2)(D)	19
28.0	Hurricane Response Annex	§25.53(e)(2)(E)	19
29.0	Cyber Security Annex	§25.53(e)(2)(F)	19
30.0	Physical Security Incident Annex	§ 25.53(e)(2)(G)	19

7.0 Record of Distribution [§25.53(c)(4)(A)] (Rev2)

The titles and names of persons within the Ector County 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:

Name	Title	Date of Access and/or Training
Bill Cirolia	Plant Manager	3/13/2023
Heather O'Neal	Plant Administrator	3/13/2023
Alex Kinne	O&M Technician	3/13/2023
Nathan Harrington	O&M Technician	3/13/2023
Richard Loya	O&M Technician	3/13/2023
Iram Sanchez	O&M Technician	3/13/2023
Jossue Torres	O&M Technician	3/13/2023
Joe VanOrshoven	O&M Technician	3/13/2023

8.0 Emergency Contacts [§25.53(c)(4)(B)] (Rev2)

13.1 Pursuant to 16 TAC § 25.53(c)(4)(B), ECG shall maintain a primary, and if possible, backup emergency contact information including the designation of specific individuals who can immediately access urgent requests and questions from the PUCT during an emergency.

13.2 Any changes to the emergency contact information, including the primary, secondary, or tertiary emergency contacts, shall be submitted to the PUCT by email promptly within

30 days of the change to emc@puc.texas.gov with the following subject line: "Emergency Contact Information.

13.3 The PUCT's website will be referenced for the most current version of the Emergency Contact Information form: https://www.puc.texas.gov/storm/contents/media/Contacts_Form.pdf (Rev2)

13.4 **Ector County Emergency Contacts**: (Rev2)

Emergency Contact Name	Title	Primary Phone	Secondary Phone	Email
24-Hour Control Center (ROC - Aliso Viejo, CA)	Primary Contact	949-297-0888	949-297-0888	dg_roc@ihipower.com
Greg Merjil	ROC Supervisor	803-206-1863	949-297-0888	greg.merjil@ihipower.com
Bill Cirolia	Plant Manager	432-614-0758	432-250-8320	bill.cirolia@ectorgeneration.com
Ches Wright	Director of Operations	916-990-6013		ches.wright@ihipower.com
Anthony Miles	Regional Safety Manager	803-206-1863		anthony.miles@ihipower.com
William (Bill) Paff	Asset Manager	281-863-9016	713-594-2696	william.paff@rocklandcapital.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 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) Ector County Generation, LLC maintains a business continuity plan that addresses returning to normal operations following disruptions caused by an incident;

6) Ector County Generation, LLC 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 14TH day of March 2023.

WILL ZAPALAC, President

SWORN to subscribe before me, this 14TH day of March 2023.

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

NOTARY PUBLIC
My Commission Expires: April 27, 2024

Ector County Generation, 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
Odessa Fire Rescue/LEPC

Date: 24 February 2023 (Rev2)

Table of Contents

Emergency Operations Plan (EOP)

1.0 Introduction [16 TAC §25.53(d)(1)(A)] (Rev2)

The Ector County Generation, LLC (Ector County or ECG) 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. Ector County 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. (Rev2)

The weatherization plan required by ERCOT Protocol § 3.21(2) is incorporated into this EOP and is addressed in the Weather Emergency Annex and in the attached Cold Weather Plan. (Rev2)

2.0 Purpose

The purpose of this Emergency Operations Plan ("EOP") is to detail the requirements and actions to take for emergency operations of the Power Generation Company's ("PGC") natural gas-fired electric generation facility in Texas and weather emergency preparedness.

3.0 Applicability [16 TAC §25.53(d)(1)(A)] (Rev2)

3.1 This plan applies to the following PGC, which is also registered with ERCOT as a Resource Entity ("RE"): Ector County Generation, LLC ("Ector County" or "ECG")

3.2 Definition of Emergency [16 TAC § 25.53(b)(3)]: For purposes of this EOP, an "emergency" includes any situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that the PGC should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. Emergencies includes, but are not limited to, any declaration of an emergency applicable to the PGC by the local (e.g., county or municipality), state, or federal government, ERCOT, or the Texas Reliability Entity. For the avoidance of doubt, an emergency includes a declaration by ERCOT of an Energy Emergency Alert ("EEA").

4.0 References

4.1 Public Utility Commission of Texas ("PUCT") substantive rule 16 Texas Administrative Code ("TAC") § 25.53: Electric Service Emergency Operations Plans.

4.2 Texas Department of Transportation, Hurricane Information: https://www.txdot.gov/travel/hurricane.html

5.0 Description of EOP Contents and Policies (Rev2)

The Ector County (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/epidemics, hurricane preparedness and response, cyber security, and physical security incidents. Finally, site-specific appendices and checklists have been provided as attachments to this EOP.

6.0 Record of Submittal of EOP (Rev2)

The Ector County EOP, including subsequent revisions, has been distributed to the following agencies and local jurisdictions:

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)

Odessa Fire Rescue
1100 W. 2nd Street
Odessa, TX 79763
Jcotton2@odessa.gov

7.0 EOP Maintenance and Updates (Rev2)

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:

a) describes the changes to the contents or policies contained in this EOP;
b) includes an updated reference to specific sections and page numbers of this EOP (Contents and Policies) that correspond with the requirements;
c) includes a record of distribution as required; and
d) 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:

a) a pleading that documents any changes to the list of emergency contacts as required;
b) 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
c) an affidavit as required.

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 Ector County's 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 commission, and an unredacted copy will be submitted to ERCOT on or before March 15th each year as required.

8.0 Plan Maintenance Responsibilities [16 TAC §25.53(d)(1)(B)](Rev2)

8.1 Asset Manager

8.1.1 The Asset Manager is responsible for the review and approval of this EOP.

8.1.2 The Asset Manager is responsible for ensuring that the EOP is submitted to the PUCT and ERCOT pursuant to the filing requirements in PUCT substantive rule 16 TAC § 25.53.

8.1.3 The Asset Manager is responsible for submitting the annual Declaration of Summer Weather Preparedness to ERCOT between May 1st and June 1st and for submitting the annual Declaration of Winter Weather Preparedness to ERCOT between November 1st and December 1st. (Rev2)

8.2 Director of Operations

Director of Operations shall review and approve this EOP.

8.3 Plant Manager

8.3.1 The Plant Manager shall maintain, review, and update this Plan. (Rev2)

8.3.2 Plant Manager is authrorized to revise this EOP following any applicable changes to the PUCT's rules to implement any feedback from personnel operating under the EOP. (Rev2)

8.3.3 The Plant Manager is responsible for reviewing, understanding, and complying with the requirements of this EOP and disseminating the EOP to on-site personnel to ensure that such personnel are appropriately trained.

8.3.4 The Plant Manager is responsible for activating the EOP and coordinating response efforts when emergency conditions impact the facility and deactivating the EOP once the emergency has passed. (Rev2)

8.3.5 The Plant Manager is responsible for conducting drill exercises and documenting the results. See Drill Summary form, Appendix C. (Rev2)

8.4 Operations and Maintenance Personnel

8.4.1 The O&M personnel are responsible for reviewing, understanding, and complying with the requirements of this EOP.

8.4.2 The O&M personnel are responsible for implementing the actions and procedures required during emergency conditions when the EOP has been activated.

9.0 Plan Assessments (Rev2)

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

10.0 Revision Labeling (Rev2)

Revisions to the Executive Summary and EOP have been indicated using revision labeling (i.e., Rev2) throughout.

11.0 Revision Control [16 TAC §25.53(d)(1)(C)] (Rev2)

This Plan shall be reviewed not less than annually to confirm all Annexes and Procedures are accurate and current.

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.

11.1 Revision Block with Approval Dates [16 TAC §25.53(d)(1)(C)] (Rev2)

Rev.	Date Approved	Revision Summary	By
0	4/18/2022	Original submittal.	Bill Cirolia
1.0	7/12/2022	Ownership and contact information updated throughout.	Bill Cirolia
2.0	2/24/2023	The ECG EOP was reformatted in its entirety to a more user-friendly format. Inconsequential revisions (i.e., typographical errors, formatting, and section number corrections) have been made throughout this EOP. QSE and Emergency Contacts have also been updated. Material revisions that could potentially have a material effect on how the site would respond to an emergency are summarized in the Executive Summary. Revisions have been labeled as Rev2 throughout.	Bill Cirolia

11.2 Revision Replacement and Succession[16 TAC §25.53(d)(1)(D)]

This Emergency Operations Plan (EOP), Rev2, with approval date of February 24, 2023, replaces and supercedes all previous Emergency Operations Plans.

12.0 Record of Distribution [16 TAC §25.53(c)(4)(A)] (Rev2)

Pursuant to 16 TAC § 25.53 (c)(4)(A), the below individuals have received access to, or training on, the Emergency Operations Plan as of the date indicated. All relevant operating personnel within the market entity are familiar with the contents of the emergency operations plan; and such personnel

have been instructed to follow the plan and the provisions contained therein in the event of a system-wide or local emergency except to the extent deviations are appropriate under the circumstances during the course of an emergency. (Rev2)

Name	Title	Date of Access and/or Training
Bill Cirolia	Plant Manager	3/13/2023
Heather O'Neal	Plant Administrator	3/13/2023
Alex Kinne	O&M Technician	3/13/2023
Nathan Harrington	O&M Technician	3/13/2023
Richard Loya	O&M Technician	3/13/2023
Iram Sanchez	O&M Technician	3/13/2023
Jossue Torres	O&M Technician	3/13/2023
Joe VanOrshoven	O&M Technician	3/13/2023

13.0 Emergency Contacts [16 TAC §25.53(c)(4)(B)] (Rev2)

13.1 Pursuant to 16 TAC § 25.53(c)(4)(B), ECG shall maintain a primary, and if possible, backup emergency contact information including the designation of specific individuals who can immediately access urgent requests and questions from the PUCT during an emergency.

13.2 Any changes to the emergency contact information, including the primary, secondary, or tertiary emergency contacts, shall be submitted to the PUCT by email promptly within 30 days of the change to emc@puc.texas.gov with the following subject line: "Emergency Contact Information.

13.3 The PUCT's website will be referenced for the most current version of the Emergency Contact Information form: https://www.puc.texas.gov/storm/contents/media/Contacts_Form.pdf (Rev2)

13.4 Ector County Emergency Contacts: (Rev2)

Emergency Contact Name	Title	Primary Phone	Secondary Phone	Email
24-Hour Control Center (ROC - Aliso Viejo, CA)	Primary Contact	949-297-0888	949-297-0888	dg_roc@ihipower.com
Greg Merjil	ROC Supervisor	803-206-1863	949-297-0888	greg.merjil@ihipower.com
Bill Cirolia	Plant Manager	432-614-0758	432-250-8320	bill.cirolia@ectorgeneration.com
Ches Wright	Director of Operations	916-990-6013		ches.wright@ihipower.com
Anthony Miles	Regional Safety Manager	803-206-1863		anthony.miles@ihipower.com
William (Bill) Paff	Asset Manager	281-863-9016	713-594-2696	william.paff@rocklandcapital.com

14.0 Common Operational Functions [16 TAC §25.53(d)] (Rev2)

Plans within this document describe the process used to report and respond to unusual events outlined in 16 TAC Sect. 25.53. Preparations and response efforts can be the same, or similar, for different types of emergencies. For example, employees may shelter-in-place during certain severe weather conditions and may be called to shelter-in-place during a physical facility threat. In addition, it may be appropriate to evacuate the site in response to various types of emergencies, such as during the event of a chemical release, during severe weather conditions, or during a bomb threat. For this reason, the common operational functions within multiple annexes, procedures, and plans may be the same or similar. In any case, Plant Management will immediately review this EOP, and actions will be taken as deemed necessary to protect plant personnel, the environment, and property. Plant management will perform this review as expeditiously as possible upon notification of a potential or impending event. (Rev2)

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 instructions outlined in corresponding plans and procedures will be invoked.

15.0 Reporting Requirements [16 TAC §25.53(g)] (Rev2)

Upon request by the PUC commission staff during activation of the State Operations Center by Texas Division of Emergency Management (TDEM), 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. Ector County 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. (Rev2)

In addition, ERCOT may require information from QSEs representing Resources regarding the Resources' fuel capabilities. Requests for this type of information shall be for a time period of no more than seven days from the date of the request. The specific information that may be requested shall be defined in the Operating Guide. QSEs representing Resources shall provide the requested information in a timely manner, as defined by ERCOT at the time of the request. (Rev2)

16.0 Drills [16 TAC § 25.53(f)]

As required by 16 TAC § 25.53(f), ECG shall conduct or participate in at least one annual drill within each calendar year to test its emergency procedures under this EOP. Following each drill, this EOP will be revised as needed. (Rev2) If ECG has activated its EOP in response to an emergency during the calendar year, then a drill is not required for that calendar year.

Because ECG is not located within a hurricane evacuation zone, no drill addressing hurricane response procedures is necessary.

The drill shall be documented using Appendix C. See Appendix C for a Drill Summary form. The completed forms shall be retained for a period of two (2) years after completion.

Upon completion of a drill exercise, drill participants may submit feedback about the EOP. The Plant Manager shall assess the effectiveness of the drill and modify the EOP as necessary.

16.1 Drill Notices (Rev2)

At least 30 days prior to the date of at least one drill each calendar year, ECG will notify the PUCT staff by email to drillnotice@puc.texas.gov and notify the appropriate Texas Department of Emergency Management ("TDEM") District Coordinator, of the date, time and location of the drill. (Rev2) The contact information for the TDEM District Coordinators for the TDEM Region in which the PGC is located is available on TDEM's website: https://www.tdem.texas.gov/regions.

17.0 Communication Plan [16 TAC §25.53(d)(2)] (Rev2)

During an emergency event, O&M personnel shall reference and follow the below policies and actions related to communications outside of ECG.

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

a) ICS-100: Introduction to the Incident Command System
b) ICS-200: ICS for Single Resources and Initial Action Incidents
c) IS-700: National Incident Management System, An Introduction
d) IS-800: National Response Framework, An Introduction (Rev2)

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. (Rev2)

Media:
Staff shall reference the Employee Handbook for the company policy regarding communications with the media. If employees receive a media inquiry regarding any matter pertaining to ECG or its affiliates, they shall not provide any statement on behalf of ECG but instead refer the matter to IHI Power Services' Communications Department, who will be responsible for responding to the media inquiry.

PUCT:
The Asset Manager shall be responsible for any communications with the PUCT during an emergency event impacting ECG.

Office of Public Utility Counsel ("OPUC"):
As the agency of the State of Texas that represents residential and small business utility customers, ECG understands that OPUC's focus is on retail electric service. Because ECG provides electricity at wholesale and not to end-use retail customers, emergency events at ECG facilities are not expected to impact retail customers or raise concerns relevant to OPUC's jurisdiction. If OPUC requests any information or otherwise communicates with ECG during an emergency, the Asset Manager shall be responsible for any communications with OPUC.

Local and state governmental entities, officials, and emergency operations centers:
In the event that communications are requirements with any local or state governmental entities, officials, or emergency operations centers, the Site Plant Manager shall be responsible for communicating with these entities about the current status of ECG.

Fuel Suppliers:
The QSE manages ECG's relationship with fuel suppliers and maintains contact information. In the event of an emergency, Tenaska personnel shall contact relevant personnel from ECG's fuel suppliers to provide and obtain information as needed.

ERCOT:
As the Reliability Coordinator, real-time communications with ERCOT are critical during emergency events. The ROC is responsible for 24/7 monitoring and control of the facility and Tenaska Power Services is ECG's QSE desk. (Rev2) In this capacity, the QSE shall maintain responsibility for communicating with ERCOT about the facility.

On-site staff shall communicate emergency conditions and events to the QSE promptly and as soon as reasonably practicable, including known and potential impacts to the facility's ability to generate, for the ROC's further communication to ERCOT.

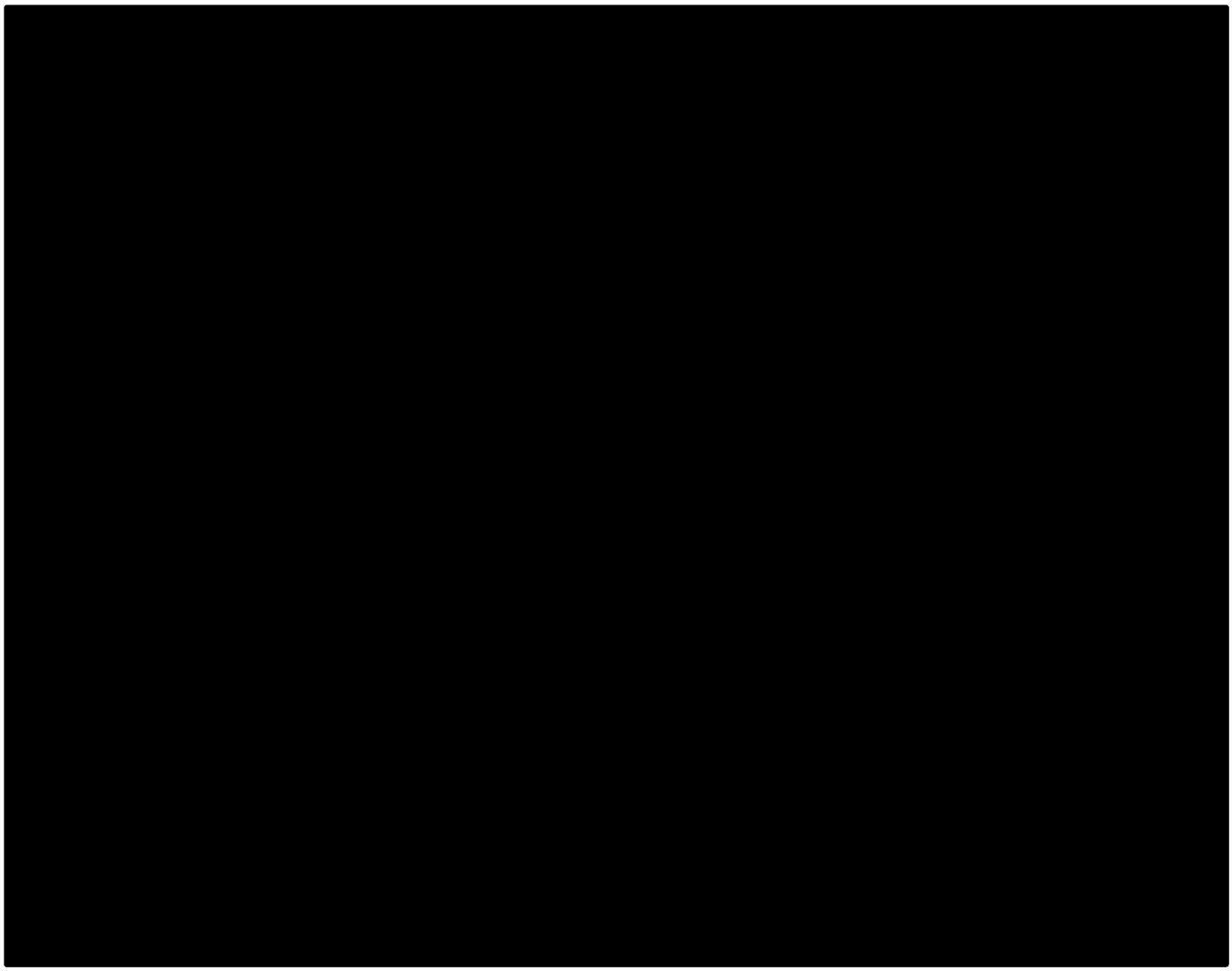
- Planned and Forced Outage notification via voice and Current Operating Plan ("COP") updates;
- MW and MVAR derates via voice and COP updates;
- Real-time telemetry via the ROCP connection;
- Voice and/or email notifications in the event of loss of communication capabilities; and Voice notification in the event of an emergency affecting the facility.

The Operations Director must be notified. 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 notifications as appropriate.

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

18.0 Business Continuity Plan [§25.53(c)(4)(C)(v)](Rev2)



19.0 Pre-Identified Supplies for Emergency Response [16 TAC § 25.53(d)(3)]

First Aid supplies are in the Operations and Maintenance ("O&M") building.
A First Aid kit is in each facility vehicle, and an Automated External Defibrillator ("AED") device is in the O&M building. (Rev2)

The facility maintains a comprehensive parts inventory that is replenished as necessary throughout the year. The facility's inventory level is not impacted by forecasted emergency conditions.

The O&M building shall be supplied with non-perishable food items (at a quantity the site Plant Manager determines appropriate), emergency lighting equipment and spare batteries, and cots/blankets for use during emergency operations.

Checklists, as well as a staffing plan, are available to ensure necessary supplies and staff are available through a weather emergency. These checklists include items from lessons learned from past weather emergencies. (Rev2)

The cold weather equipment supplies are to be inventoried and resupplied in early October each year in preparation for winter weather. (Rev2)

The site Plant Manager will periodically and at least annually inventory emergency supply items and restock as necessary.

20.0 Emergency Event Staffing [16 TAC § 25.53(d)(4)]

The facility is monitored, operated, and controlled locally, with the ability to monitor and operate remotely from the ROC located in Aliso Viejo, California if necessary. The ROC is staffed 24 hours/day, 7 days/week with qualified operations personnel.

ECG is maintained by the facility O&M personnel located at the facility during business hours.

Facility personnel remain on-call during off-hour periods and can report to the facility promptly upon dispatch from the Plant Manager.

Upon activation of the EOP, the Site Plant Manager shall notify all on-site personnel via text and phone call of the emergency and of the activation of the EOP and shall instruct those on- site personnel not at the facility at that time to standby for any potential need to assist with emergency operations. As the Site Plant Manager deems necessary, the Site Plant Manager may place personnel on standby to proceed to the facility to assist with emergency operations.

Upon deactivation of the EOP after the emergency, the Site Plant Manager shall notify all on-site personnel and any personnel on standby of the deactivation.

21.0 Plan for Identifying Weather-Related Hazards and EOP Activation [16 TAC § 25.53(d)(5)] (Rev2)

Local weather conditions, including severe weather such as tornados, drought, and flooding are monitored during all hours of operation by on-site personnel. (Rev2) In addition, facility personnel are equipped with radios and phones to receive weather notifications while operating the facility. (Rev2)

Ector County operations staff will conduct daily meetings (or calls) with its QSE in which, among other things, the weather forecast is reviewed along with any implications to generator availability. (Rev2) Additionally, Ector County maintains contacts that receive Operating Condition Notices (OCNs), Advisories, Watches and Emergency Notices from ERCOT which include information on weather conditions that may affect system reliability. (Rev2)

If a weather-related hazard is identified by ERCOT that is expected to directly affect the Ector County region, the Ector County Plant Manager will activate this EOP and will direct staff to follow the applicable policies and procedures within the EOP, except to the extent that deviations are appropriate under the circumstances during an emergency. (Rev2) Upon activation of the EOP, the site Plant Manager shall notify his direct supervisor of the action. (Rev2) If supervisor notification is initially provided by a means other than in writing, site Plant Manager shall subsequently notify his direct supervisor of the activation via email as soon as practicable. (Rev2)

Otherwise, in the event of a credible emergency or severe weather threat with potential to affect ECG, the site Plant Manager shall activate this EOP as applicable. (Rev2) Facility personnel shall respond to a severe weather event by following and referencing the Severe Weather Plan, including a thunderstorm, tornado, or flash flood. (Rev2)

Operations at ECG shall continue under the activated EOP until the emergency or threat has passed and the Site Plant Manager informs site personnel that the EOP has been deactivated. (Rev2) Upon deactivation of the EOP, the Site Plant Manager shall notify his direct supervisor via email of the action. (Rev2)

Cold Weather: Ector County will activate its Cold Weather Plan if ERCOT issues an OCN for severe winter weather and/or freezing conditions that directly affect the Ector County region. (Rev2)

Hot Weather: While Ector County units G1 and G2 have a high temperature design rating of 103 degrees Fahrenheit, historical operational data indicates that in July 2020 the units successfully operated during a period with a maximum temperature of 116 degrees Fahrenheit. (Rev1) Therefore, Ector County currently has no operational concerns regarding severe hot weather conditions or hot weather emergencies. If operational concerns should arise during a hot weather emergency, any such lessons learned will be documented in a new response procedure and/or checklist. (Rev2)

Hurricanes: Ector County is not located within a hurricane evacuation zone as defined by the Texas Division of Emergency Management (TDEM); therefore, Ector County does not have a hurricane preparedness and response plan. (Rev2)

Drought: In the event of an emergency shortage of water or drought, Ector County is a simple-cycle facility that does not require water for use in typical power production nor in emissions control. While the facility uses well water for its GT inlet evaporative cooler system, the risk of short-term loss of water is mitigated by 480,000 gallons of onsite raw water storage. If a long-term loss of water supply occurs, including drought conditions, the facility can operate with a slight derate of approximately 25-35 MW. (Rev2)

22.0 Weather Emergency Annex [16 TAC § 25.53(e)(2)(A)] (Rev2)

In any event, the safety of all personnel will be of paramount concern followed by the protection of the environment and the integrity of plant equipment and facility property. (Rev2)

During severe thunderstorms, caution will be used during outside activities. If thunderstorms are in the immediate area of the facility, outside activities will be curtailed as much as possible. Personnel shall avoid being at the highest elevation on any structure. All mobile equipment (i.e., forklift) will be brought inside the warehouse, if possible. All gas cylinder racks will be secured or brought inside if possible. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used. (Rev2)

In the event a tornado is sighted or reported the actions of facility's Emergency Response Plan (Procedure No. SMP-2) will be followed. (Rev2)

Ector County's Cold Weather Plan and Severe Weather Plan are included in Appendix E and Appendix F attached. (Rev2)

Critical failure points (or critical components) during cold weather include control valves, instrument air, closed cooling water, and instrumentation. The freezing of this equipment could negatively impact the ability of the plant to operate. Engineering and administrative controls have been put in place to

help prevent freezing of these critical components, including insulation and heat tracing. A Critical Component List, along with corresponding engineering and administrative controls, is attached in Appendix E, Attachment 3. (Rev2)

22.1 Cold Weather Preparedness and Response (Rev2)

Ector County has taken proactive measures to minimize the impact of winter weather on operations. Freeze protection components such as heat trace, tank heaters, oil heaters, space heaters, equipment insulation, and plant staffing are utilized to protect equipment against freezing conditions and to safely respond to adverse winter weather conditions. The details of these measures are included in Ector County's Cold Weather Plan, which is attached to this EOP as Appendix E. (Rev2)

In summary, winter weather season preparatory procedures are completed prior to the designated winter months of November through March and are subsequently reviewed each month throughout the designated winter months. (A Monthly Winterization Checklist is included in the Cold Weather Plan (Appendix E) as Attachment 2.) Any discrepancies noted during winter checks are documented and corrected as soon as possible. (Rev2)

Cold weather equipment and fuel for auxiliary equipment are inventoried in October each year. All facility heat trace circuits are tested prior to the Winter Weather Season and then monthly from November through March of each year. All piping and equipment insulation is visually inspected and repaired or replaced as needed prior to December 1st. In addition, compartment heaters are inspected and cleaned, buildings are inspected for integrity, and winter readiness maintenance is performed on the instrument air system. Finally, Temporary wind breaks are installed on the LCI Heat Exchanger coolers prior to December 1st. (Rev2)

When ambient temperatures are at or below 32 degrees Fahrenheit, operations personnel will respond by completing an Operations Shift Winterization Checklist (see Appendix E, Attachment 1) at the beginning of each shift, and prior to turning the plant over to the ROC at the end of each day. Cold Weather Staffing will consist of at least two (2) people on shift around the clock until the emergency has been lifted. (Rev2)

22.2 Minimum and Maximum Design Temperature Limits

Weather design limits for the facility are summarized in Table 1, below. The design does not preclude operation of the facility outside of these stated limits; rather they represent the design basis for full output of the facility.

The table lists the minimum and maximum design basis for the facility pursuant to design documents prepared during construction.

Design Basis	Min Temp (^{0}F)	Max Temp (^{0}F)	Max Wind Speed (mph)
Ector County	0	103	90

22.3 Operations During Cold or Hot Weather Emergency [16 TAC § 25.53(e)(2)(A)(i)]

ECG uses a combination of guidance issued by its Qualified Scheduling Entity ("QSE") agent, Tenaska Power Services LLC, industry best practices, and regional experience to maintain the facility during periods of severe cold and hot weather.

The simple cycle, single fuel natural gas turbine facility has a minimal number of systems that are affected by cold temperature extremes. These systems and the means to protect them during these periods of extreme weather are detailed in the site-specific document for the facility, the Cold Weather Plan ("CWP"). The CWP is included in Appendix E. During severe cold weather events, the on-site personnel shall reference the policies and procedures in the CWP and follow all actions required in the CWP for work performed on-site.

(Rev2) Site Plant Manager shall increase staffing levels to staff the facility 24/7 and subsequently notify the Remote Operation Center ("ROC").

On-site personnel shall perform the Operations Shift Winterization Checklist included as Attachment 1 to the CWP in Appendix E, notify site Plant Manager of any unsatisfactory conditions, and take immediate action to correct any discrepancies.

No operational concerns arise from severe hot weather conditions or hot weather emergencies. To the extent that on-site personnel discover any operational concerns during a hot weather emergency, any such lessons-learned shall be documented in a new procedure and/or checklist.

For further guidance regarding the site personnel response and safety during a declared weather-related emergency refer to the following procedures:

Thermal Heat and Cold Stress
Thermal JHA Inclement Weather

22.4 Cold Weather and Hot Weather Checklists [16 TAC § 25.53(e)(2)(A)(iii)] (Rev2)

Checklists, as well as a staffing plan, are available to ensure necessary supplies and staff are available through a weather emergency. These checklists include items from lessons learned from past weather emergencies.

Reference Appendix E for Cold Weather Checklists.

22.5 Alternative Fuels and Fuel Switching [16 TAC 25.53 (e)(2)(A)(ii)]

Fuels, including on-site fuel storage or procurement of alternative fuels and verification of the adequacy or operability of fuel switching equipment, are not applicable to the Ector County facility because it employs single-fuel gas turbines to generate power and does not currently have the capability to utilize alternative fuels.

23.0 Declarations of Summer and Winter Weather Preparedness

As required by ERCOT Nodal Protocol § 3.21(4), between May 1 and June 1 each year, Ector County must submit to ERCOT the annual Declaration of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination stating that, at the time of submission, Ector County has completed or will complete all weather preparations required by the weatherization plan for equipment critical to the reliable operation of the resource during the summer Peak Load Season. If the work on the equipment that is critical to the reliable operation of the resource is not complete at the time of filing the declaration, Ector County shall provide a list and schedule of remaining work to be completed.

Ector County must state that it has made, or its QSE agent has made, a documented effort to communicate with the operator of each natural gas pipeline that is directly connected to its facility to coordinate regarding impacts to the facility's availability during the summer Peak Load Season of that year.

If Ector County or Ector County's QSE agent knows that an activity or condition related to a natural gas pipeline directly connected to its facility will cause the facility to be unavailable, in whole or in part, then Ector County's QSE agent must, as soon as practicable, report such outage or derate in the ERCOT Outage Scheduler. However, such an outage or derate is not required to be disclosed in the Declaration.

The Declaration of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination form is provided in ERCOT Protocol § 22 Attachment K, available on ERCOT's website: https://www.ercot.com/mktrules/nprotocols/current. This declaration must be executed by an officer or executive with authority to bind Ector County.

As required by ERCOT Nodal Protocol § 3.21(3), and except for 2021, between November 1 and December 1 each year, Ector County must submit to ERCOT the annual Declaration of Completion of Generation Resource Winter Weatherization Preparations stating that, at the time of submission, Ector County has completed or will complete all weather preparations required by the weatherization plan for equipment critical to the reliable operation of the resource during the winter Peak Load Season. If the work on the equipment that is critical to the reliable operation of the resource is not complete at the time of filing the declaration, Ector County shall provide a list and schedule of remaining work to be completed.

The Declaration of Completion of Generation Resource Winter Weatherization Preparations form is provided in ERCOT Protocol § 22 Attachment O, available on ERCOT's website: https://www.ercot.com/mktrules/nprotocols/current. This declaration must be executed by an officer or executive with authority to bind Ector County.

See ERCOT's website for the most current versions of the Declaration of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination and Declaration of Completion of Generation Resource Winter Weatherization Preparations: https://www.ercot.com/mktrules/nprotocols/current

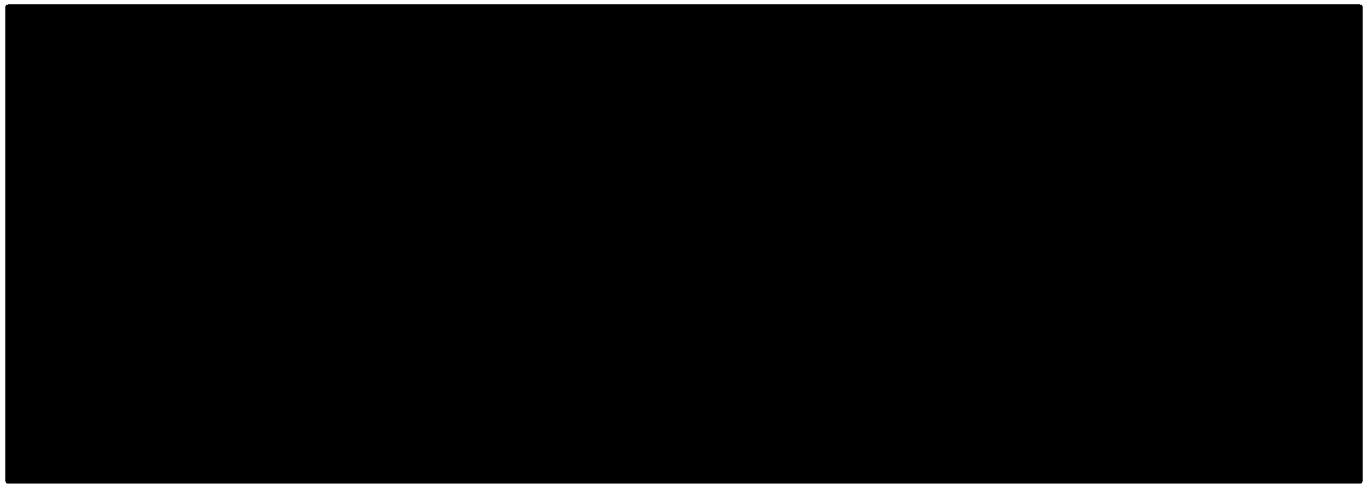
24.0 Water Shortage Annex [16 TAC § 25.53(e)(2)(B)]

Ector County is a simple-cycle facility that does not require water for use in typical power production nor in emissions control. The facility uses a local well (sole user) to supply water for its evaporative cooler system, which lowers ambient temperature in the gas turbine inlet during hot weather.

The risk of short-term loss of water is mitigated by 480,000 gallons of onsite raw water storage. The facility can operate the evaporative coolers for approximately 72 hours using this onsite stored water if a short-term water loss occurs from the well.

If a long-term loss of water supply occurs, including drought conditions, the facility can continue operation with a slight derate of approximately 25-35 MW while the water shortage persists.

25.0 Restoration of Service Annex [16 TAC § 25.53(e)(2)(C)]



26.0 Wildfire Response Annex [16 TAC § 25.53(e)(1)(D)(Rev2)

In the event of a wildfire event that that threatens the Ector County region, site personnel will immediately notify the Remote Operating Center (ROC) and the Asset Manager and provide as much information as available. In addition, site personnel will continuously monitor the location and intensity of the wildfire through contact with local authorities.

If structural damage is known or suspected, the CTGs will follow equipment shutdown procedures to shutdown units. In the event of a wildfire threat to the substation area, the ROC will be notified of the situation and of intent to de-energize the substation. The interconnecting utility will be contacted and requested to de-energize the substation. In the event of a wildfire threat to the generator tie line, the ROC will be notified of the situation and of the intent to de-energize the line. The interconnecting utility will be notified and requested to de-energize the generator tie line.

Following a wildfire event, Ector County Management will assess the facility as soon as safely possible for damages. Equipment inspections will be performed prior to re-energizing equipment. Estimates and proposals to make any repairs necessary to restore facilities will be solicited and provided to Asset Management for review and approval. Following repairs, the facility will be restored to service in according to normal operating procedures.

See Appendix B for a copy of the Wildfire Response Checklist.

27.0 Pandemic and Epidemic Annex [16 TAC § 25.53(e)(2)(D)]

In the event of a pandemic or epidemic recognized by the Centers for Disease Control and Prevention or other recognized epidemiological authority and that potentially impacts the vicinity of the Ector County facility, local personnel shall continue to perform the monitoring and control of the facility after implementing and following the Pandemic and Epidemic Response Checklist.

See Appendix A for the Pandemic and Epidemic Response checklist.

28.0 Hurricane Response Annex [16 TAC § 25.53(e)(2)(E)

Not applicable. The Ector County facility is not located within a hurricane evacuation zone (see Reference 3.2 for identification of hurricane evacuation zones).

29.0 Cyber Security Annex [16 TAC § 25.53(e)(2)(F)]

[redacted]

30.0 Physical Security Incident Annex [16 TAC § 25.53(e)(2)(G)] (Rev2)

[redacted]

31.0 Document Retention

ECG shall retain documentation associated with this EOP for a period of two (2) years from the completion of such documentation.

32.0 Appendices and Attachments

Appendix A: Pandemic and Epidemic Response Checklist
Appendix B: Wildfire Response Checklist

Appendix C: Drill Summary (Rev2)
Appendix D: Emergency Plan Training Summary
Appendix E: Cold Weather Plan
Appendix F: Severe Weather Plan

Appendix A: Pandemic and Epidemic Response Checklist (Rev2)

(Use upon declaration of a pandemic or epidemic by regional or national authority.) (Rev2)

- ❑ Date and time initiated:
- ❑ Location/Facility:
- ❑ Name of individual completing form:
- ❑ Affected personnel/positions:
- ❑ Immediate Actions
  - ❑ Employees: notify Plant Manager/HR if they are ill, becomes ill, or if a person in their household is ill.
    - ❑ Do not report for work until notified by supervision to do so.
    - ❑ Communicate frequently with HR regarding status of illness and availability for work.
  - ❑ Isolate personnel: notify infected or potentially affected personnel to remain at home.
  - ❑ Notify HR of personnel isolated due to illness/potential illness.
    - ❑ Date/Time and person notified.
  - ❑ Disinfect workstations and common areas frequented by infected or potentially infected personnel.
    - ❑ Date/time complete:
  - ❑ Place disinfecting wipes and sanitizer in common areas and at each common workstation (and instruct personnel to use prior to and following shift change if applicable).
    - ❑ Date/time complete:
  - ❑ Assess business impact (Plant Manager/Asset Manager)
    - ❑ Can facility(s) still be dispatched normally? (Yes/No)
      - ❑ If no – what actions are necessary to return to service?
        - ❑ Initiate outage reporting in accordance with established methods.
          - ❑ Date/time and person making report:
    - ❑ Are adequate personnel available to maintain facility? (Yes/No):
      - ❑ If no – consider whether personnel can be made available from un-affected sites.
        - ❑ If personnel are brought from other sites, list names (of enter n/a):
        - ❑ _____
    - ❑ Reschedule/Delay maintenance activities.
      - ❑ If maintenance activity involves outside contractor personnel and/or travel:
        - ❑ Assess potential financial penalty for delay.
        - ❑ Asset Mgr.: decide whether to proceed or re-schedule.
          - ❑ Decision:
            - ❑ If re-schedule
              - ❑ Notify contractor:
              - ❑ Notify ERCOT
      - ❑ If maintenance activity does not require outside contractor personnel follow normal protocol for re- scheduling outage/maintenance activity.

- ❑ Date and time initiated:
- ❑ Location/Facility:
- ❑ Name of individual completing form:
- ❑ Affected area (i.e., entire facility, only certain locations, T-line only,)
- ❑ Immediate Actions upon discovery of fire that will affect facility.

  NOTE: Personnel safety is the utmost priority.
  - ❑ Notify
    - ❑ ROC (date time notified):
    - ❑ Plant Manager (date time notified):
      - ❑ Note: Plant Manager notifies counterparties– date/time will be in site operations log.
    - ❑ Asset Manager (date time notified):
  - ❑ Maintain contact with local authority – determine whether site, substation, or generator tie line is affected.
    - ❑ Site: shutdown CTG's(s) if structural damage is known or suspected
    - ❑ SUBSTATION:
      - ❑ If fire is in immediate area and course/direction imminently threatens substation:
        - ❑ Notify ROC of situation and of intent to de-energize substation.
          - ❑ Date/time and person notified:
        - ❑ Notify interconnecting utility – request they de-energize substation by opening the interconnecting substation tie line breaker.
          - ❑ Date/Time and person notified.
          - ❑ Date/time substation de-energized
    - ❑ GENERATOR TIE LINE
      - ❑ If fire is in immediate area and course/direction imminently threatens tie line:
        - ❑ Notify ROC of situation and of intent to de-energize line.
          - ❑ Date/time and person notified:
        - ❑ Notify interconnecting utility – request they de-energize the generator tie line by opening the interconnecting substation tie line breaker.
          - ❑ Date/Time and person notified.
          - ❑ Date/time substation de-energized
  - ❑ Follow-up action:
    - ❑ Assess damage:
      - ❑ Site: Inspect burn area for damage
        - ❑ Note damage or provide relevant EAM WO #'s:
          - ❑ Damage:
      - ❑ GENERATOR TIE LINE:
        - ❑ If fire crossed or reached tie line area perform **PRIOR TO ENERGIZING LINE**:
          - ❑ Perform pole-by-pole inspection for damage.
            - ❑ Note damaged pole location (if any) or provide EAM WO #'s.
              - ❑ Damage:
          - ❑ Inspect tie line for obvious signs of damage.
            - ❑ Note damage or provide relevant EAM WO #'s:
              - ❑ Damage:

- SUBSTATION:
  - If De-energized during fire-then **PRIOR TO ENERGIZING**
    - Perform a monthly substation walk-down using the SMP Checklist.
    - Perform an orderly restoration of power.
- Provide estimated return to service information to:
  - Asset Manager (date/time notified):
  - ROC (date/time notified)
- When repair work complete, if any, restore facility to service in accordance with normal procedure.

Appendix C: Drill Summary

Date of Drill: _____

Drill Facilitator: _____

Participants:

Scenario(s):

Results/Lessons Learned:

Participant Comments/Feedback:

Action items, if applicable (if not applicable, enter N/A):

Drill Facilitator Signature: _____Drill complete: _____

Appendix D: Emergency Planning Training Summary

Training applies to: Texas: Generating Facility Office/Administrative Personnel Texas O&M Technicians ROC Control Room Operators
Texas Asset Supervisory Personnel (i.e. Asset Manager, Thermal Operations Management) Texas EHS Personnel

Summary/Outline:

a. Purpose: Provide training and guidance for facility actions during infrequent events

b. Applicability
   i. Texas assets

c. References
   i. Texas PUC rule 16 Texas Administrative Code § 25.53
   ii. Ector County Energy Center's Emergency Operations Plan

d. Procedure
   i. Weatherization and Cold Weather Plan
   ii. Restoration of Service
   iii. Pandemic and Epidemic Response: use of the checklist, expected actions
   iv. Wildfire Plan: use of the checklist, expected actions

e. Responsibilities
   i. O&M Personnel
   ii. Asset Management

f. Training Requirements
   i. Affidavit of training

g. Documentation
   i. Contacts with Authorities: Schedule Annual Drill
   ii. Logs and log-keeping
   iii. Drill records
   iv. Emergency contact list
   v. Affidavit
   vi. Reports made to other Parties, if applicable

Appendix E: Ector County Cold Weather Plan

This Cold Weather Plan is confidential, Protected Information pursuant to ERCOT Nodal Protocol § 1.3.1.1(1)(m), (q), and (bb).

1.0 PURPOSE:

1.1 This Cold Weather Plan (Plan) has been developed to supplement the Ector County Generation (ECG) Emergency Operations Plan and to provide guidance and instructions for the ECG staff to prepare for and respond to winter weather. (Rev2) Implementation of this Plan will help to ensure that best efforts are made to prepare the plant for winter weather and to help ensure that the plant will remain available during the winter months for the following reasons: (Rev2)

1.1.1 To satisfy the requirements of the Public Utility Commission of Texas (PUC) in Project No. 51840- Rulemaking to Establish Electric Weatherization Standards; *[16 Texas Administrative Code (TAC) § 25.55(c)(1)(A).*

1.1.2 To minimize the impact of winter weather on plant operability and readiness; and

1.1.3 To proactively winterize plant systems that are not used during cold weather.

2.0 SCOPE:

2.1 This Plan applies to the various plant freeze protection and cold weather equipment systems, including heat trace, tank heaters, oil heaters, building space heaters, equipment insulation, and conditions related to plant staffing to safely respond to adverse winter weather scenarios.

2.2 This Plan covers the actions to be taken to best ensure that the plant will remain available during the winter months, that appropriate records are maintained, and compliance with the regulatory reporting requirements.

3.0 DEFINITIONS:

3.1 Generation Resource *[16 TAC § 25.55(b)(4)]:* A generator capable of providing energy or ancillary services to the ERCOT grid and that is registered with ERCOT as a generation resource, as well as associated facilities controlled by the generation entity that are behind the generator's point of interconnection, necessary for the operation of the generator, and not part of a manufacturing process that is separate from the generation of electricity.

3.2 Cold Weather Critical Component *[16 TAC § 25.55(b)(1)]:* Any component that is susceptible to freezing or icing, the occurrence of which is likely to significantly hinder the ability of a resource or transmission system to function as intended and, for a generation entity, to lead to a trip, derate, or failure to start of a resource.

3.3 Weather Emergency *[16 TAC § 25.55(b)(7)]:* For the purpose of this Cold Weather Plan, a situation resulting from weather conditions that produces significant risk for a transmission service provider (TSP) that firm load must be shed or a situation for which ERCOT provides

advance notice to market participants, including ECG or its QSE agent Tenaska Power Services LLC, involving weather-related risks to the ERCOT power region.

3.4 Weather Emergency Preparation Measures *[16 TAC § 25.55(b)(8)]:* Measures that a generation entity takes to support the function of a facility during a weather emergency.

4.0 PRECAUTIONS AND LIMITATIONS:

4.1 Warning: Heat trace systems are electrical systems that contain 120 – 220 Volts of Alternating Current (VAC) power. Take appropriate precautions when working on these systems.

4.2 By its very nature, an inclement weather situation or Weather Emergency brings with it certain hazards due to extremely cold temperatures. These hazards include, but are not limited to, ice/slip hazards, equipment complications and temperature exposure risks. Plant personnel should take all necessary safety precautions.

5.0 PREREQUISITES:

5.1 The preparatory procedures described in this Plan are to be completed prior to the winter months of November-March (Winter Weather Season) and reviewed monthly throughout these designated winter months to ensure that the freeze protection and cold weather systems are functioning properly. *[16 TAC § 25.55(c)(1)(B)]*

5.2 A refresher training session will be held annually prior to November to review this Plan with plant personnel. *[16 TAC § 25.55(c)(1)(D)]*

5.3 For safety reasons, unless authorized by plant management, staffing during adverse weather conditions shall consist of at least two individuals. *[16 TAC § 25.55(c)(1)(A)]*

5.4 Electrical drawings and relevant supporting documentation to the Plan are readily available onsite.

6.0 COMMUNICATIONS:

6.1 During a Weather Emergency, if for any reason the plant experiences an abnormal event that **may** require the plant to be shut down, derated, or unavailable, the Control Room Operator will contact the ROC, or Backup Control Center (BCC) if applicable, and plant management immediately.

6.2 If ECG is informed that ERCOT has declared a Weather Emergency, a log entry is to be made in the operations log and site management is to be informed immediately.

7.0 WINTERIZATION PROCEDURE:

7.1 Freeze Protection Components *[16 TAC § 25.55(c)(1)(B)]*: ECG's Freeze Protection Components include the heat trace system and insulation. These components are tested monthly during the Winter Weather Season in accordance with (IAW) the Monthly Winterization Checklist.

7.2 Monthly Winterization Checklist – Attachment 2 *[16 TAC § 25.55(c)(1)(B)]:* The Monthly Winterization Checklist is a facility check to be performed in early October each year

and then on a monthly basis through March of the following year to ensure ECG is best prepared for operations during the Winter Weather Season.

7.3 Any discrepancies identified in the performance of the Monthly Winterization Checklist procedure are to be documented as Work Requests in Maximo (The Maintenance Management System in use at the facility) and corrected as soon as possible.

7.4 Cold Weather Equipment Inventory *[16 TAC § 25.55(c)(1)(B)]*: The cold weather equipment supplies are to be inventoried and resupplied in early October each year in preparation for winter weather.

7.5 Fuel for auxiliary equipment (such as portable heaters and air compressors) is to be refilled in early October each year and maintained throughout the Winter Weather Season.

7.5.1 Onsite Fuel Security *[16 TAC § 25.55(c)(1)(A) & (B)]*

7.5.1.1 As a single fuel natural gas turbine facility, onsite fuel storage of natural gas is not feasible.

7.5.1.2 Fuel is delivered to the facility via a transmission pipeline owned and controlled by a third-party pipeline operator and connecting to ECG at meter name Ector County Energy Center and number #102396. The fuel delivery piping inside the facility's property beginning at the meter is owned and controlled by ECG and its Freeze Protection Components are maintained in accordance with Sections 7.6 – 7.9. (Rev2)

7.6 Heat Trace *[16 TAC § 25.55(c)(1)(B)]*

7.6.1 All facility heat trace circuits will be tested annually IAW the applicable preventative maintenance (PM) (ECG HEAT TRACE PM) prior to the Winter Weather Season, and monthly from November **through** March.

7.6.1.1 Testing shall include checking circuit integrity and operation, visual inspection of all accessible heat trace components, and operation of indicator lights to alert operators to potential problems.

7.6.1.2 All ECG heat trace circuits are thermostatically controlled. All thermostats will be checked for proper set point and automatic operation.

7.6.1.3 All insulated "hot boxes" will be checked to ensure they are properly secured to or around the equipment they are protecting, and any temperature controls are working properly.

7.6.1.4 Testing results shall be documented in EAM.

7.6.1.5 All heat trace circuits shall be inspected for proper operation during each performance of operator rounds during a Weather Emergency.

7.7 System Insulation *[16 TAC § 25.55(c)(1)(B)]*

7.7.1 All piping and equipment will be visually inspected for insulation integrity annually IAW the applicable PM (ECG COLD PREP).

7.7.2 Any damaged or missing insulation will be replaced or repaired as needed and prior to December 1st.

7.7.3 All other equipment or piping will be assessed as to whether insulation is needed. Equipment that has not been previously insulated may require insulation to protect it from extreme cold. Any items thought to need insulation installed or added will be insulated.

7.8 Compartment Heaters *[16 TAC § 25.55(c)(1)(B)]*

7.8.1 All building compartment heaters will be cleaned and checked for proper operation annually IAW the applicable PM (ECG WINT 1Y HTR INS). This includes gas turbine package heaters.

7.8.2 Cleaning and testing results shall be documented in EAM.

7.8.3 All unmanned building thermostats will be set to at least 55 deg. F.

7.8.4 All spaces shall be checked for proper heater operation during operator rounds.

7.9 Building Integrity *[16 TAC § 25.55(c)(1)(B)]*

7.9.1 All plant buildings will be checked for weather tightness and insulation prior to December 1.

7.9.2 By December 1, building louvers will be shut or other suitable method to prevent the in-draw of cold air around unprotected equipment.

7.10 Compressed Air System *[16 TAC § 25.55(c)(1)(B)]*

7.10.1 The Compressed Air System includes an instrument air moisture prevention system and it will have the following winter readiness maintenance performed, including dryer functions per the applicable annual PM (ECG AIR SYS INSP):

7.10.2 The Compressed Air System will be checked for proper operation during operator rounds.

7.10.3 Air dryer operation will be checked on each shift to ensure dryers are functioning properly.

7.10.4 All Compressed Air System low point drains will be blown down weekly during winter months IAW the weekly PM (ECTOR-IA-1WK WINTER).

7.11 Load Commutating Inverter (LCI) - DC Link Reactor *[16 TAC § 25.55(c)(1)(B)]*

7.11.1 The DC link reactor is susceptible to snow intrusion. The DC link reactor upper vents shall be replaced with solid covers to prevent snow entry from the top. The bottom of the DC Link Reactor shall be enclosed with sheet metal to prevent snow entry from the bottom prior to December 1.

7.12 Wind Breaks *[16 TAC § 25.55(c)(1)(B)]*

7.12.1 Install temporary wind breaks on the LCI Heat Exchanger coolers prior to December 1. The LCIs are the starting means for the gas turbines.

7.13 Other materials *[16 TAC § 25.55(c)(1)(A)]*

7.13.1 Hydrogen gas for generator cooling inventory shall be maintained at levels of a 1 month supply per generator during the Winter Weather Season.

7.13.2 Continuous Emissions Monitoring System (CEMS) calibration gas inventories shall be checked weekly to be proactive in maintaining inventory levels.

7.14 Winterization of non-essential systems

7.14.1 Drain the following systems prior to December 1 each year:

7.14.1.1 Evaporative coolers

7.14.1.2 Closed Circuit Coolers (Wet Towers for CCW cooling)

8.0 DAILY COLD WEATHER ROUTINES:

8.1 Operations Shift Winterization Checklist – Attachment 1 *[16 TAC § 25.55(c)(1)(B)]*

When ambient temperatures are at or below freezing (≤ 32°F), each operations shift shall perform the Operations Shift Winterization Checklist at the beginning of their shift, and prior to turning over the plant to the ROC at the end of the day.

8.2 Cold Weather Staffing *[16 TAC § 25.55(c)(1)(B)]*

When ERCOT declares a Weather Emergency, ECG staffing will staff shifts with at least two people on site around the clock until the Weather Emergency is lifted.

9.0 COLD WEATHER CRITICAL COMPONENTS:

9.1 Cold Weather Critical Components and associated engineering and administrative controls are identified and listed in Attachment 3. *[16 TAC § 25.55(b)(1).*

9.2 After the Winter Weather Season each year, the Cold Weather Critical Components list will be reviewed to determine if there are any adjustments to the list based on plant response during the past Winter Weather Season.

10.0 MINIMUM DESIGN AND MINIMUM EXPERIENCED AMBIENT TEMPERATURES:

10.1 Minimum design ambient temperature for the plant is 0°F pursuant to design documents prepared during construction of ECG. *[16 TAC § 25.55(c)(1)(E)]*

10.1.1 There are no experienced or established operating limitations based on precipitation, humidity, or wind direction. *[16 TAC § 25.55(c)(1)(E)]*

10.1.2 The maximum design wind speed for plant structural design is 90 mph pursuant to design documents prepared during construction of ECG. *[16 TAC § 25.55(c)(1)(E)]*

10.1.3 Minimum experienced ambient temperature for the plant is 0.1°F (2/15/21) with no plant operation. *[16 TAC § 25.55(c)(1)(E)]*

10.1.4 Minimum experienced ambient temperature for the plant is 0.1°F (2/15/21) while operating at least 1 unit. *[16 TAC § 25.55(c)(1)(E)]*

Appendix E: Ector County Cold Weather Plan, cont.

11.0 REQUIRED REPORTING:

11.1 Winter Weather Readiness Report *[16 TAC § 25.55(c)(2)]*

11.2 The PUC requires that generation owners provide confirmation by December 1, 2021 of the completion of all activities required by 16 TAC § 25.55(c)(1), subject to any good cause exception submitted, to address winter weather readiness.

11.3 Attachment 4 – Generation Winter Weather Readiness Report Form must be submitted to the PUCT and ERCOT by December 1st each year. The Report must include a notarized attestation sworn to by the highest-ranking representative, official, or officer with binding authority over ECG attesting to the completion of all Winter Weather Emergency Preparation Measures at ECG required by 16 TAC § 25.55(c)(1).

11.4 ECG Plant Manager will submit notification to senior management that the conditions of Attachment 4 – Generation Winter Weather Readiness Report Form are met at least 2 weeks prior to December 1st each year. For 2021, ECG Plant Manager will submit such notification to senior management as early as possible prior to December 1.

11.5 A PM (ECG WINT 1Y CWP) is issued on October 1st each year to perform this procedure prior to winter.

11.6 The early start of winterization preparations is to ensure adequate time for any necessary corrective maintenance, installation of protective measures, and personnel training and adjustments.

12.0 RESPONSIBILITIES:

12.1 Plant Manager

12.1.1 Review and revise this Plan as necessary.

12.1.2 Ensure that the Site Technicians are adequately trained on implementation of this Plan.

12.1.3 Review PMs and Operator round sheets upon completion to ensure proper performance of these procedures.

12.1.4 Site Technicians

12.1.4.1 Understand and perform this Plan as needed.

12.1.4.2 Promptly communicate to site management any abnormal conditions found during maintenance or routine inspections per this Plan.

12.1.4.3 Asset Manager

12.1.4.3.1 Obtain senior management approval of and submits approved Winter Weather Readiness Report to ERCOT and the PUCT on or before December 1st each year.

13.0 DATA RETENTION:

13.1 PM records are to be attached in Maximo and retained electronically.

13.1.1 Any logs or other records are required to be retained for a minimum of 3 years, or indefinitely if they are related to a weather-related forced outage or unavailability.

Appendix E: Ector County Cold Weather Plan, cont.

14.0 ATTACHMENTS:

Attachment 1: Operations Shift Winterization Checklist
Attachment 2: Monthly Winterization Checklist
Attachment 3: Critical Component Checklist

Attachment 1 - Operations Shift Winterization Checklist

The following items will be checked at the beginning of each shift during cold weather events, and prior to turning the shift over to the ROC at the end of shift:

Item to be checked	Sat	Unsat
All heat trace circuit power supplies are on.		
No heat trace circuit breakers are tripped.		
Heat trace circuits are energized and functioning properly.		
There are no alarms on the Mk VI that might indicate a low temperature condition of concern for critical components or compartments.		
All building and compartment doors are closed and latched, as verified on the operator round sheet.		
All compartment heaters in above-referenced buildings are functioning properly, as verified on the operator round sheet.		
All thermostats of above-referenced heaters are set to the appropriate temperature, as verified on the operator round sheet.		
All installed wind breaks are in place and installed correctly.		
All temporary mitigation items are plugged in and functioning, full of fuel, etc.		
No insulation damage, water leaks, or indications of a frozen or burst pipe.		
Plant walkways are free of snow and ice.		
Gas turbine inlet pre-filters are not clogged and are clear of snow build-up.		

Date: _____ **Time:** _____ **Completed By:** _____

Note: Initiate a work request in Maximo and notify the Plant Manager immediately regarding all unsatisfactory conditions noted above.

Attachment 2 – Monthly Winterization Checklist

Item	Data	Initial
Warehouse: Ensure heaters all turned ON		
Fire Pump Room: Ensure heaters are turned ON		
M&E Building: Ensure Raw Water & Demin tank heater breakers are closed		
M&E Building: Ensure Heat Trace Panel power is ON, no alarms, and in Auto		
Air Compressor Room: Ensure heaters are ON		
Air Compressor Room: Un-pin vent fan louvers so that they close		
Air Compressor Room: Disconnect linkage on west louvers by Demin Pumps		
Gas Skid: Check heaters and gas transmitters for proper operation		
Bath Heater: Check Water/Glycol mixture with refractometer. Results:	_____°F	
Gas Turbine 1: Ensure Heat Trace Panel power is ON, no alarms, and in Auto		
GT1: Ensure PEECC heaters are in Auto and operating properly		
GT1: CEMS shack: unhook condensate pump drain line and route to container		
GT1: Check Cooling Water/Glycol with refractometer. Results:	_____°F	
GT1 Exciter/LCI Compartment: Ensure heaters in Auto and operating properly		
LCI Install covers over the exciter louvers on both units		
GT2: Ensure Heat Trace Panel power is ON, no alarms, and in Auto		
GT2: Ensure PEECC heaters are in Auto and operating properly		
GT2: CEMS shack: unhook condensate pump drain line and route to container		
GT2: Check Cooling Water/Glycol with refractometer. Results:	_____°F	
GT2 Exciter/LCI Compartment: Ensure heaters in Auto and operating properly		
Install (verify installed) temporary valve actuator covers for FGS-FCV- 0124A/B, FGS-FCV-0125A/B, FGS-PCV-0126A/B & FGS-FCV-0506		

**M&E: Mechanical and Electrical Building, PEECC: Packaged Electronic Electrical Control Compartment, CEMS: Continuous Emissions Monitoring System*

All checks are completed and signed off above. Sign, date, route to the Plant Manager for review.

Date:_____Time:_____Completed By:_____

Manager Review:_____Date: _____

(Scan and file in winterization records folder.)

Attachment 3 – Critical Component List

Component ID	Name	Engineering Controls	Administrative Controls
FSV-0101	FUEL GAS EMERGENCY SHUTOFF VALVE	Insulation Installed	Daily Visual Inspections
FCV-0124A	FUEL GAS REGULATING SKID BLOCK VALVE	Insulation Installed	Daily Visual Inspections
FCV-0124B	FUEL GAS REGULATING SKID BLOCK VALVE	Insulation Installed	Daily Visual Inspections
PCV-0125A	FUEL GAS REGULATING SKID CONTROL VALVE	Insulation Installed	Daily Visual Inspections
PCV-0125B	FUEL GAS REGULATING SKID CONTROL VALVE	Insulation Installed	Daily Visual Inspections
PCV-0126A	FUEL GAS REGULATING SKID CONTROL VALVE	Insulation Installed	Daily Visual Inspections
PCV-0126B	FUEL GAS REGULATING SKID CONTROL VALVE	Insulation Installed	Daily Visual Inspections
IA	INSTRUMENT AIR SYSTEM	Air dryers rated to design dew point of -40°F	Automatic air dryer blowdowns, daily checks of dew point, weekly low point blowdown.
CCW-1	CLOSED COOLING WATER SYSTEM #1	Filled With 50% Glycol Solution for Freeze Protection	Check Glycol Ratio with Refractometer Monthly during winter season.
CCW-2	CLOSED COOLING WATER SYSTEM #2	Filled With 50% Glycol Solution for Freeze Protection	Check Glycol Ratio with Refractometer Monthly during winter season.
LCI-1	LOAD COMMUTED INVERTER #1	Cooling Lines and Radiator Insulated and Cooling Loop Uses Glycol Solution	Check Glycol Ratio with Refractometer Monthly during winter season.
LCI-2	LOAD COMMUTED INVERTER #2	Cooling Lines and Radiator Insulated and Cooling Loop Uses Glycol Solution	Check Glycol Ratio with Refractometer Monthly during winter season.
DCR-1	DC LINK REACTOR	Skirting To Prevent Snow and Ice Ingress	Daily Visual Inspections
DCR-2	DC LINK REACTOR	Skirting To Prevent Snow and Ice Ingress	Daily Visual Inspections
GT1 Components			
VS4-1	GT1 GAS SAFETY SHUT OFF VALVE	Insulation Installed	Daily Visual Inspections
VS4-4	GT1 GAS SAFETY SHUT OFF VENT VALVE	Insulation Installed	Daily Visual Inspections
52BN1	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BN2	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BT1	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BT2	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52TK1	EXHAUST FRAME BLOWER PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52TK2	EXHAUST FRAME BLOWER PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP A	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP B	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP C	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
CPD	CPD SENSOR ENCLOSURE	Insulation Installed	Daily Visual Inspections
CSBHX	INLET BLEED HEAT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections

GT2 Components			
VS4-1	GT2 GAS SAFETY SHUT OFF VALVE	Insulation Installed	Daily Visual Inspections
VS4-4	GT2 GAS SAFETY SHUT OFF VENT VALVE	Insulation Installed	Daily Visual Inspections
52BN1	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BN2	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BT1	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52BT2	COOLING FAN DISCHARGE PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52TK1	EXHAUST FRAME BLOWER PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
52TK2	EXHAUST FRAME BLOWER PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP A	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP B	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
AFPAP C	AMBIENT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections
CPD	CPD SENSOR ENCLOSURE	Insulation Installed	Daily Visual Inspections
CSBHX	INLET BLEED HEAT PRESSURE SENSOR	Insulation Installed	Daily Visual Inspections

(Attachment 3 – Critical Component List, cont.)

Appendix F: Severe Weather Plan

Severe weather (including thunderstorms, tornados, or flash floods) can occur with minimal notice based on local weather conditions. In the case of a severe storm approaching Ector County, Texas, the following steps are to be taken:

Severe Storm Warning (1 to 24 Hours' Notice):

1. Employees should make sure that all materials and equipment are secured.
2. All crane booms shall be lowered to the ground and secured.
3. All small vehicles, welding machines and compressors shall be secured.
4. All office trailers and buildings shall be locked.
5. Storm will be monitored and, if necessary, site shall be evacuated.

Lightning and High Wind

Water, high ground, open spaces, solitary tall trees, and metal objects should be avoided during lightning and high wind events. If shelter is not available, employees should follow these precautions:

- Crouch down with both feet together. Do not lie down or place hands on the ground.
- Do not stand near other people. Keep a minimum distance of 15 feet apart.

If inside a shelter:

- Stay away from doors, windows and avoid water.
- Turn off and unplug electrical appliances (e.g., computers, power tools). If appliances cannot be unplugged (e.g., telephones), stay away from them.

Persons injured by lightning do not carry an electrical charge and can be handled safely. Administer first aid/cardiopulmonary resuscitation (CPR) to a lightning victim if you're qualified to do so. Send for help immediately.

If heavy winds occur, seek shelter immediately. Remember that loose materials can become airborne.

Tornadoes

Tornadoes can affect the area of the Ector County project. In the event of a severe storm, work will be stopped. In the event that the National Weather Service alerts a Tornado Warning, employees will take proper shelter (or shelter in place). (Rev2) If a tornado warning is activated in a neighboring county, and weather service has forecasted the tornado towards the project, employees will tie down any needed equipment. The Plant Manager or his designee may dismiss employees from the site if conditions warrant it.

Flash Floods

Flash floods pose potential problems at Ector County. During a rain event, seek high ground. Flash floods can trap employees at low level areas. Employees are to only travel through minimal moving water if they MUST. Otherwise, if water poses no further danger, they are to stay on high ground until the water subsides.