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Affidavit for Emergency Operations Plan

STATE OF CALIFORNIA	§
	§
COUNTY OF SAN MATEO	§

AFFIDAVIT OF AARON ZUBATY

BEFORE ME, the undersigned authority, on this day appeared Aaron Zubaty who being by me first duly sworn, on oath, deposed and said the following:

1. I am the highest-ranking representative, official, or officer with binding authority over Madero Grid, LLC and Ignacio Grid, LLC. Madero Grid, LLC and Ignacio Grid, LLC are registered power generation companies. I have personal knowledge of the facts stated in this affidavit and they are true and correct.

2. I am familiar with the Emergency Operations Plan ("EOP") for Madero Grid, LLC and Ignacio Grid, LLC and the executive summary of the EOP being filed with the Public Utility Commission of Texas in accordance with 16 Tex. Admin. Code ("TAC") § 25.53.

3. The EOP contains confidential, security-sensitive information requiring filing under seal in accordance with 16 TAC § 22.71(d). The EOP is also Protected Information under the ERCOT Protocols.

4. As required by 16 TAC § 25.53(c)(4)(C)(i), I affirm that all relevant operating personnel within Madero Grid, LLC and Ignacio Grid, LLC are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

5. As required by 16 TAC § 25.53(c)(4)(C)(ii), I affirm that the EOP has been reviewed and approved by the appropriate executives.

6. As required by 16 TAC § 25.53(c)(4)(C)(iii), I affirm that a drill has been or will be conducted this calendar year, in accordance with 16 TAC § 25.53(f).

7. As required by 16 TAC § 25.53(c)(4)(C)(iv), I affirm that the EOP or an appropriate summary has been distributed to local jurisdictions as needed.

8. As required by 16 TAC § 25.53(c)(4)(C)(v), I affirm that Madero Grid, LLC and Ignacio Grid, LLC maintain a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

9. As required by 16 TAC § 25.53(c)(4)(C)(vi), I affirm that Madero Grid, LLC and Ignacio Grid, LLC's emergency management personnel who are designated 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.

Further affiant sayeth not.

Aaron Zubaty

SUBSCRIBED AND SWORN TO BEFORE ME ON THIS 13 OF March, 2023.

Notary Public in and for the State of California

SEE ATTACHED

CALIFORNIA JURAT GOVERNMENT CODE § 8202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of SAN MATEO

Subscribed and sworn to (or affirmed) before me on

this 13 (Date) day of MARCH (Month), 2023 (Year), by

(1) AARON ZUBATY

(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

ANNA MARIE CORONA
Notary Public - California
Santa Clara County
Commission # 2335787
My Comm. Expires Oct 16, 2024

Signature _____
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

1.0 POWER GENERATION COMPANY INFORMATION

PGC Name and Number	Generating Facility Name
Ignacio Grid LLC (PGC20669)	Ignacio Grid Energy Storage Facility
Madero Grid LLC (PGC20671)	Madero Grid Energy Storage Facility

1.1 Statement of Joint Filing of EOP

Ignacio Grid LLC and Madero Grid LLC has jointly created its emergency operations plan and all annexes. These joint documents satisfy the requirements for each entity to which the documents apply (Ignacio and Madero). All content contained in the EOP and all content and references within Section 2.0 and Section 3.0 of this Executive Summary apply jointly to the PGCs, and this joint EOP satisfies the filing requirements under PUCT §25.53 for an EOP as if each entity had filed a separate EOP.

2.0 EXECUTIVE SUMMARY - EOP CONTENTS

2.1 Summary of Emergency Operations Annex

The *Emergency Operations Annex* is the over-arching document that sets the policies for severe weather planning, identification of equipment critical failure points, identification of business continuity critical failure points for personnel, restoration of services, and training and drill requirements. This Annex also contains the general emergency site procedures (e.g. evacuation, personnel injuries and treatment, fire and hazardous material response, and suspected threats or sabotage).

2.2 Summary of Pandemic and Epidemic Preparedness Annex

The *Pandemic and Epidemic Annex* serves as the annex for maintaining essential functions and services during a pandemic. This document addresses the specialized continuity planning required by addressing considerations, challenges, and elements specific to the dynamic nature of a pandemic or epidemic. The Annex defines a crisis team that is responsible for evaluation and assessment, as well as the development of response actions and communications.

2.3 Summary of Hot Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme hot weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.4 Summary of Cold Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme cold weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.5 Summary of Hurricane Annex Content

This annex addresses the requirements related to preparing for and responding to severe weather events specific to hurricanes and tropical storms and supports the *Hot Weather Annex* and the *Cold Weather Annex*. The annex addresses pre-hurricane season checks and training, pre-event checks when hurricane or tropical storm conditions are forecast, communications within the PGC organizational structure as well as to external Reliability Entities. In the event an evacuation is necessary, guidance is given for evacuation and subsequent re-entry into the facility. Additionally, high-level safety protocols are described for re-entry into a facility that was unattended during storm conditions.

2.6 Cyber and Physical Security Incident Annex

This annex is specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents. The annex addresses how to identify potential physical or cyber indicators of an incident, and how to escalate, investigate, and report a potential or actual incident.

3.0 EXECUTIVE SUMMARY – DOCUMENT AND REQUIREMENTS MAPPING

Requirement	Addressed in document	Where it is addressed in the document
(d) Information to be included in the emergency operations plan		
(1)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(1)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • B. Roles and Responsibilities
(1)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • C. Revision Control Summary
(1)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • D. Revision Control Summary (p. 6)
(1)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • C. Approvals (p. 5)
(2)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability

Requirement	Addressed in document	Where it is addressed in the document
(2)(B)	Emergency Operations Plan	Section 2.0 Communication Plan (p. 6)
(2)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(2)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(3)	Emergency Operations Plan	• Section 3.0 Plan for Pre-Identified Supplies for Emergency Use (p. 7)
	Cold Weather Annex	5.0 Cold Weather Preparation and Response Processes (p. 6) • 5.1 Cold Weather Equipment Inventory List (p. 6) • 5.4 Post-Event and Annual Review (p. 7) • Attachment 4: Cold Weather Equipment Inventory (p. 18) • Attachment 5: Pre-Winter Checklist (p. 19) • Attachment 7: Extreme Cold Weather Checklist (p. 21)
	Hot Weather Annex	5.0 Hot Weather Preparation and Response Processes (p. 8) • 5.1 Hot Weather Equipment Inventory List (p. 6) • 5.4 Post-Event and Annual Review (p. 7) • Attachment 4: Hot Weather Equipment Inventory (p. 17) • Attachment 5: Pre-Summer Checklist (p. 20) • Attachment 7: Extreme Hot Weather Checklist (p. 22)
(4)	Emergency Operations Plan	• Section 4.0 Plan to Address Staffing During Emergency Response (p. 7) • Section 8.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 8)
	Cold Weather Annex	• 5.6 Additional Staffing Considerations for Weather Events (p. 7) • Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 7) • Attachment 6: Pre-Event Checklist (p. 20)
	Hot Weather Annex	• 5.6 Additional Staffing Considerations for Weather Events (p. 7) • Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 7)

Requirement	Addressed in document	Where it is addressed in the document
		• Attachment 6: Pre-Event Checklist (p. 19)
	Hurricane Annex	• 7.1 Re-entry Procedure (p. 12)
	Pandemic and Epidemic Annex	Section 5.0 Essential Roles and Personnel (p. 5)
(5)	Emergency Operations Plan	• Section 5.0 Identification of Weather-Related Hazards (p. 7) • Section 6.0 Process for Activating the EOP (p. 8)
(6)	Cold Weather Annex, Hot Weather Annex, Cyber and Physical Security Incident Annex, Hurricane Annex, Pandemic and Epidemic Annex	• Cold Weather Annex • Hot Weather Annex • Cyber and Physical Security Incident Annex • Hurricane Annex • Pandemic and Epidemic Annex
(e) Annexes to be included in the emergency operations plan		
(1)(A thru I)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(2)(A)(i)	Cold Weather Annex	Entire document
	Hot Weather Annex	Entire document
	Hurricane Annex	Entire document
(2)(A)(ii)	Cold Weather Annex	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction
	Hot Weather Annex	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction
(2)(A)(iii)	Cold Weather Annex	• 5.4 Post-Event and Annual Review (p. 7) • Attachment 5: Pre-Winter Checklist (p. 19) • Attachment 7: Extreme Cold Weather Checklist (p. 20)
	Hot Weather Annex	• 5.4 Post-Event and Annual Review (p. 7) • Attachment 5: Pre-Summer Checklist (p. 20) • Attachment 7: Extreme Hot Weather Checklist (p. 20)
(2)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.3 Statements of §25.53 Non-Applicability
(2)(C)	Emergency Operations Plan	Section 10.0 Restoration of Service (p. 10) • 10.1 Failure to Start or Tipping Off-line • 10.2 Response Time and Backup Power
(2)(D)	Pandemic and Epidemic Annex	Entire document
(2)(E)	Hurricane Annex	• Section 6.0 Evacuation Routes (p. 11) • 6.1 Evacuation Notification (p. 12) • 6.2 Notification to Control Center of Evacuation Notification (p. 12) • 7.0 Facility Re-Entry Post Storm, 7.1 Re-entry Procedure (p. 12)

Requirement	Addressed in document	Where it is addressed in the document
(2)(F)	Cyber and Physical Security Incident Annex	Entire document
(2)(G)	Cyber and Physical Security Incident Annex	Entire document
(3)(A thru E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(4)(A thru F)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability

4.0 RECORD OF DISTRIBUTION AND TRAINING

This table presents information, as required, of the persons in the entity's organization receiving access to and training on the EOP, as appropriate.

Organization Name	Individual Name	Title	Date(s) of Distribution, Access, or Training on EOP
Eolian	Eugene Settoon	Director, Investments	4/15/2022
Eolian	Jacob Heffelfinger	Chief Information Officer	4/15/2022
Novasource	Michael Wong	Area Manager	4/15/2022
Novasource	Michael Wong	Area Manager	11/15/2022
Eolian	Eugene Settoon	Director, Investments	11/15/2022
Eolian	Jeremy Thomas	Asset manager	11/15/2022
Novasource	Asher Berino	Project Manager	11/15/2022
Novasource	Robb Wilson	Director of Pre-COD and BESS Products	11/15/2022
Novasource	Julio Tinajero	PMO Manager	11/15/2022
Novasource	George Dillard	Field Personnel	11/15/2022
Novasource	Michael Schultes	Field personnel	11/15/2022
Novasource	Christopher Chavez	compliance	11/15/2022
Novasource	Gigi Mulavin	Project onboarding specialist	11/15/2022

5.0 Changes to EOP's Contents and/or Policies

The first submission of the EOP to the PUCT was done at a time when the site was still under construction and the site operations and management team was early in their onboarding process. Several site-specific engineering attributes, such as maximum and minimum operating temperature, were not fully known or calculated at the time of the prior submission. The vast majority of the changes to the EOP was to fill in placeholder values for those attributes which were not known at the time of the first submission and update the various checklists to meet site-specific requirements and best practices of our operations and management team.

DOCUMENT OWNERS

Entity	Title	Name
Eolian	Director, Investments	Eugene Settoon
Eolian	Asset Manager	Jeremy Thomas

REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero, and NovaSource	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME	Updated page numbers following updates to annexes.
1.2	3/14/2023	Madero	Include section describing changes to the full EOP suite of documents for 3/15/23 submission.

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Madero Grid LLC and Ignacio Grid LLC, jointly referred to as Madero, specific to cold weather operations, planning, and emergency response. Madero does not have any fuel switching equipment nor does it use water in the generation of electricity.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Madero Compliance Manager.

B. Roles and Responsibilities

1.2 Madero Compliance Manager

1.2.1 Role – The Madero compliance manager and owner of the EOP.

1.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Madero's business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Reviews and approves the EOP annually.
- Maintains evidence.

1.3 NovaSource Power Services (NSPS) Site Manager

1.3.1 Role – the manager of the team contracted to perform the O&M services at the Madero Facility.

1.3.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-cold weather checks and winter season review activities have been complete.
- Oversee the day-to-day operations of the Madero facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address cold weather preparation needs or deficiencies.
- Notify the Compliance Manager of weatherization tasks progress, scheduling, or concerns with meeting deadlines.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Madero upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Madero upon completion and by the end of each calendar year.
- Provide evidence to Madero Compliance Manager upon completion and request.

1.4 NSPS Field Services

1.4.1 Role – Contracted to perform the O&M services at the Madero Facility.

1.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Site Manager and Compliance Manager.
- Coordinate with and report facility weather-related information to Site Manager and NovaSource Control Room (NSCR) Operating Personnel.
- Identify potential risk areas due to cold weather conditions and report opportunities to improve readiness and response to the Site Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.

- Participate in post-winter evaluations to assess the effectiveness of this annex and provide feedback.

1.5 NSCR Operating Personnel

1.5.1 Role – The registered Generator Operator (GOP) for the Madero facility.

1.5.2 Responsibilities include:

- Operates the Madero site from the NSCR operations center in Chandler, Arizona.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Madero outage, shutdown, or curtailment.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Madero upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

2.0 LOCAL CONDITIONS

For comparison, at the McCallen Miller International Airport Station (~8 miles from Mission). The National Weather Service[1] data shows record high temperatures of 111°F (degrees Fahrenheit) in June 2017, 102°F in November 1988, and 101°F in February 2017. Record low temperatures are reported as 13°F in January of 1962, 18°F in December 1989, and 22°F in February 2021. The mean high temperature in August is 103°F and the mean low temperature in January is 33°F. There is no snowfall average reported in this location and total precipitation averages 22.64 inches. Records date back to 1961 for this location.

3.0 REQUIRED TIMELINES FOR COLD WEATHER/WINTER PREPARATIONS

3.1 Pre-Winter Season Checks

Prior to **October 1** of each calendar year, Field Services will complete a *Pre-Winter Checklist*.

3.2 Pre-Event and Extreme Cold Weather Checks

Field Services will utilize and complete the *Pre-Event Checklist* upon recognition or notification of a possible weather-related event (e.g. extreme cold weather or otherwise). The *Extreme Cold Weather Checklist* will be utilized prior to the possibility of extreme cold weather event. When wind chill reaches frostbite within 10 minutes, NSPS will cease all outdoor work until

[1] https://www.weather.gov/wrh/Climate?wfo=bro

temperature and wind-chill factor warms out of this dangerous zone. The process for activating the EOP and annexes is documented in the *Emergency Operations Plan*.

4.0 MADERO CRITICAL COMPONENTS AND EQUIPMENT

5.0 COLD WEATHER PREPARATION AND RESPONSE PROCESSES

To support the facility's seasonal cold weather preparedness, address known critical failure points, and address the effects of equipment and facility weather design limitations, several checklists are provided to prepare and safeguard the facility. Field Services personnel will utilize these checklists to prepare for winter and respond to cold weather events.

5.1 Cold Weather Equipment Inventory List

Prior to the onset of the winter season and/or a severe cold weather event, Field Services personnel will ensure there are adequate inventories of all critical supplies, spare parts, equipment, and consumables that would aid in keeping the facility operational during severe cold weather events and responding to these events. Field Services personnel will use and complete the *Cold Weather Equipment Inventory* and provide the dated checklist as evidence that the inventory review was performed.

5.2 Pre-Winter Checklist

The *Pre-Winter Checklist* includes verifications of Field Services personnel readiness and review of this annex. These checklists are due within specified timeframes as they connect directly to required reporting to ERCOT and the PUCT.

5.3 Pre-Event and Extreme Cold Weather Checklists

The Pre-Event Checklist and the *Extreme Cold Weather Checklist* will be completed by Field Services personnel to verify communications and preparations are completed and that the facility's critical equipment is protected and functioning properly in advance of each forecasted extreme weather event.

5.4 Post-Event and Annual Review

After each severe cold weather event and before the kickoff of the winter season preparations, Field Services personnel will utilize a review process to formally recognize procedural strengths, evaluate improvement opportunities, corrective actions needed, updates needed to address past weather emergencies, assessment of necessary supplies, and lessons learned, which will be incorporated into the EOP going forward.

Any work orders arising from this review process will also be implemented. All changes to these procedures and the EOP must be communicated to relevant operating personnel and regulators. In addition, the Site Manager will identify and communicate to the Compliance Manager any weatherization improvements that should be included for the subsequent year's budget.

5.5 Documenting Winter Season Preparedness Activities via Work Order Management

Field Services personnel will review its work management system to ensure adequate annual preventative work orders exist for winter season preparedness. Field Services personnel will also ensure: (i) all open corrective maintenance items that could affect facility operation and reliability in cold weather; and (ii) all cold weather preparedness preventative work orders are completed prior to the onset of the winter season.

5.6 Additional Staffing Consideration for Weather Events

The Site Manager will consider the need for enhanced staffing at the facility) during anticipated severe weather events. Planning for this staffing should include arrangements for transportation, lodging/meals, and in-house food inventories, as available. Site Manager will consider personnel hazard such as road conditions and other winter hazards when deploying Technicians to support the site (see section 7.0). Personnel safety is priority one.

7.0 COLD-RELATED SAFETY INFORMATION

7.1 Personnel Safety

Personnel safety during extreme cold weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Madero Personnel will stay informed of potential severe weather events and utilize the information in this annex to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme cold weather events.

7.2 Frostbite

Frostbite is most common on the fingers, toes, nose, ears, cheeks, and chin. Because of skin numbness, you may not realize you have frostbite until someone else points it out.

7.2.1 Signs and symptoms of frostbite include:

- At first, cold skin and a prickling feeling
- Numbness
- Red, white, bluish-white, or grayish-yellow skin
- Hard or waxy-looking skin
- Clumsiness due to joint and muscle stiffness
- Blistering after rewarming, in severe cases

7.2.2 Seek medical attention if you experience:

- Signs and symptoms of superficial or deep frostbite
- Increased pain, swelling, redness or discharge in the area that was frostbitten
- Fever
- New, unexplained symptoms.

7.3 Hypothermia

Seek immediate medical attention if you suspect hypothermia, a condition in which your body loses heat faster than it can be produced.

7.3.1 Signs of hypothermia include:

- Intense shivering
- Slurred speech
- Drowsiness and loss of coordination

7.4 Safety Procedures

7.4.1 During extreme cold weather events, facility Personnel should adhere to the following procedures.

7.4.1.1 Limit your time outdoors in cold, wet, or windy weather.

7.4.1.2 Dress in multiple layers of loose, warm clothing, along with using Personal Protective Equipment (PPE), as needed.

7.4.1.3 Change out of wet clothing as soon as possible.

7.4.1.4 Wear a hat or headband that fully covers your ears.

7.4.1.5 Wear socks and sock liners that fit well, wick moisture, and provide insulation.

7.4.1.6 Seek medical care immediately if you or a co-worker shows symptoms of cold weather-related illness.

7.5 Driving conditions when deploying to site.

7.5.1 During extreme winter storms the road conditions may be extremely hazardous to drive on as the vehicles in Texas are not typically outfitted with extreme winter tires or chains, which presents a hazard to the Technician and others on the road. Consider the following before deploying to site:

7.5.1.1 Don't transverse to Site if there are hard frozen roads as "black ice" could be present. This is ice which is hidden from the driver and may look like clear road, but in fact is covered with ice. This condition is extremely dangerous as the vehicle may spin out of control.

7.5.1.2 Follow all Highway Patrol orders. If while transitioning to site, Highway Patrol stops the vehicle, let them know the employers name and destination. They may turn the vehicle around; comply with their orders.

7.5.1.3 Ensure the vehicle is equipped with ice spikes that can be placed over the boots, which will prevent slips and falls.

9.0 ANNUAL TRAINING AND ANNEX REVIEW

It is imperative that all relevant operating personnel are familiar with and committed to following this annex, except to the extent that deviations are appropriate under the circumstances during an extreme cold weather event.

To that end, annual review and training will be conducted on cold weather and facility-specific topics to support readiness for executing and implementing this annex. Training must use this annex and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by cold conditions.
- A review of cold weather health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended weather outlook.

All records of attendance for the annual training, drills, or exercises involving this annex will be retained in the Madero evidence repository.

10.0 ERCOT ANNUAL WINTER WEATHER DECLARATION SUBMITTAL

10.1 ERCOT Requirement for Annual Winter Weatherization Declaration Submittal

10.1.1 Madero must submit a declaration between **November 1 and December 1** that it has completed or will complete all weather preparations required by this annex for equipment critical to the reliable operation of the Generation Resource during the winter time period (December through February).

10.1.1.1 If the work on the equipment that is critical to the reliable operation of the Generation Resource is not complete at the time of filing the declaration, the Resource Entity shall provide a list and schedule of remaining work to be completed. The declaration shall be executed by an officer or executive with authority to bind the Resource Entity.

10.1.2 Madero will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

11.0 RESOURCES AND RELATED DOCUMENTS

Madero Emergency Operations Plan

Madero Cyber and Physical Security Incident Annex

Madero Hot Weather Annex

Madero Hurricane Annex

Madero Pandemic and Epidemic Annex

ERCOT

Current Protocols - Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

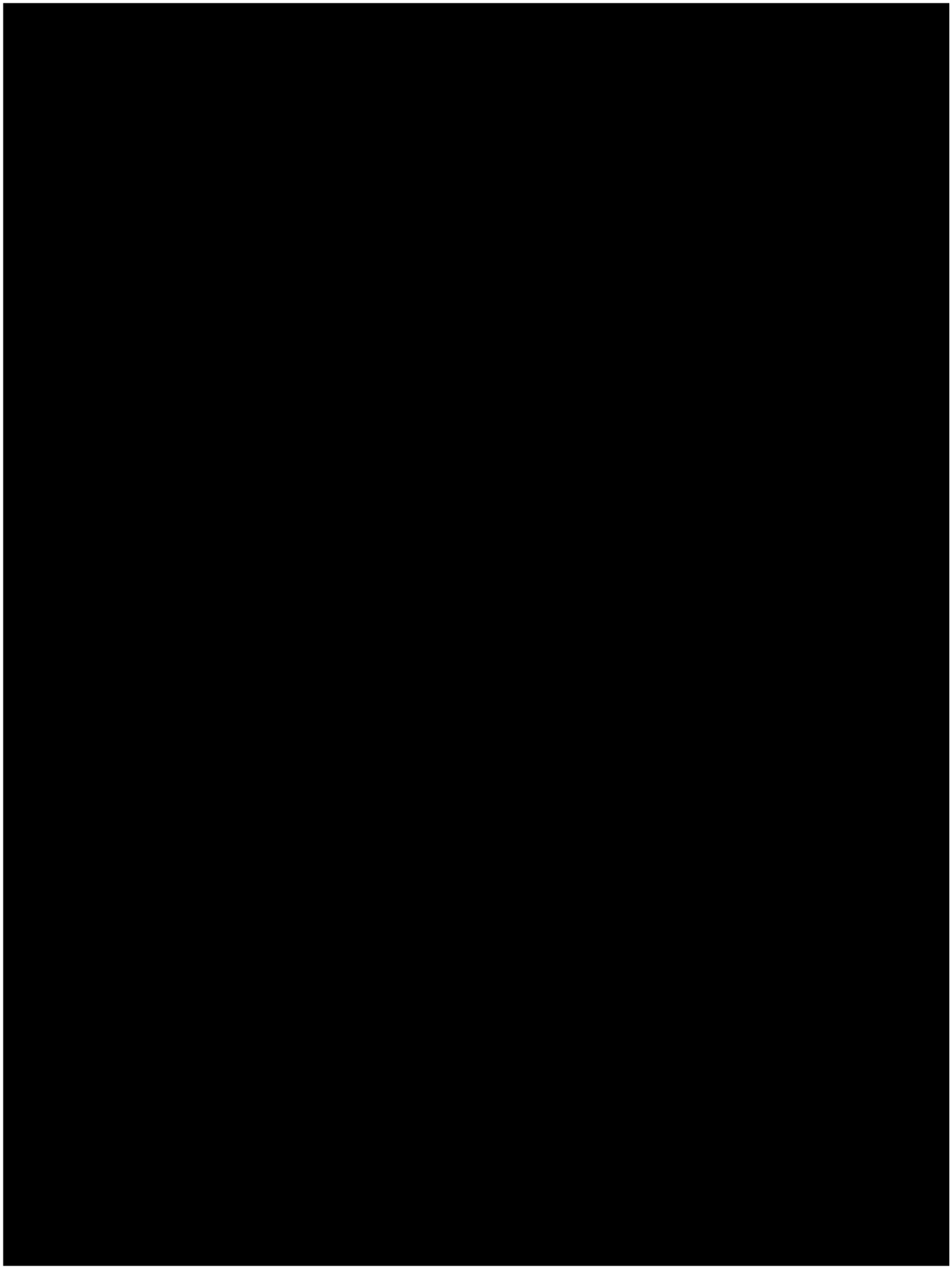
12.0 SECTION 25.53 DEFINITIONS

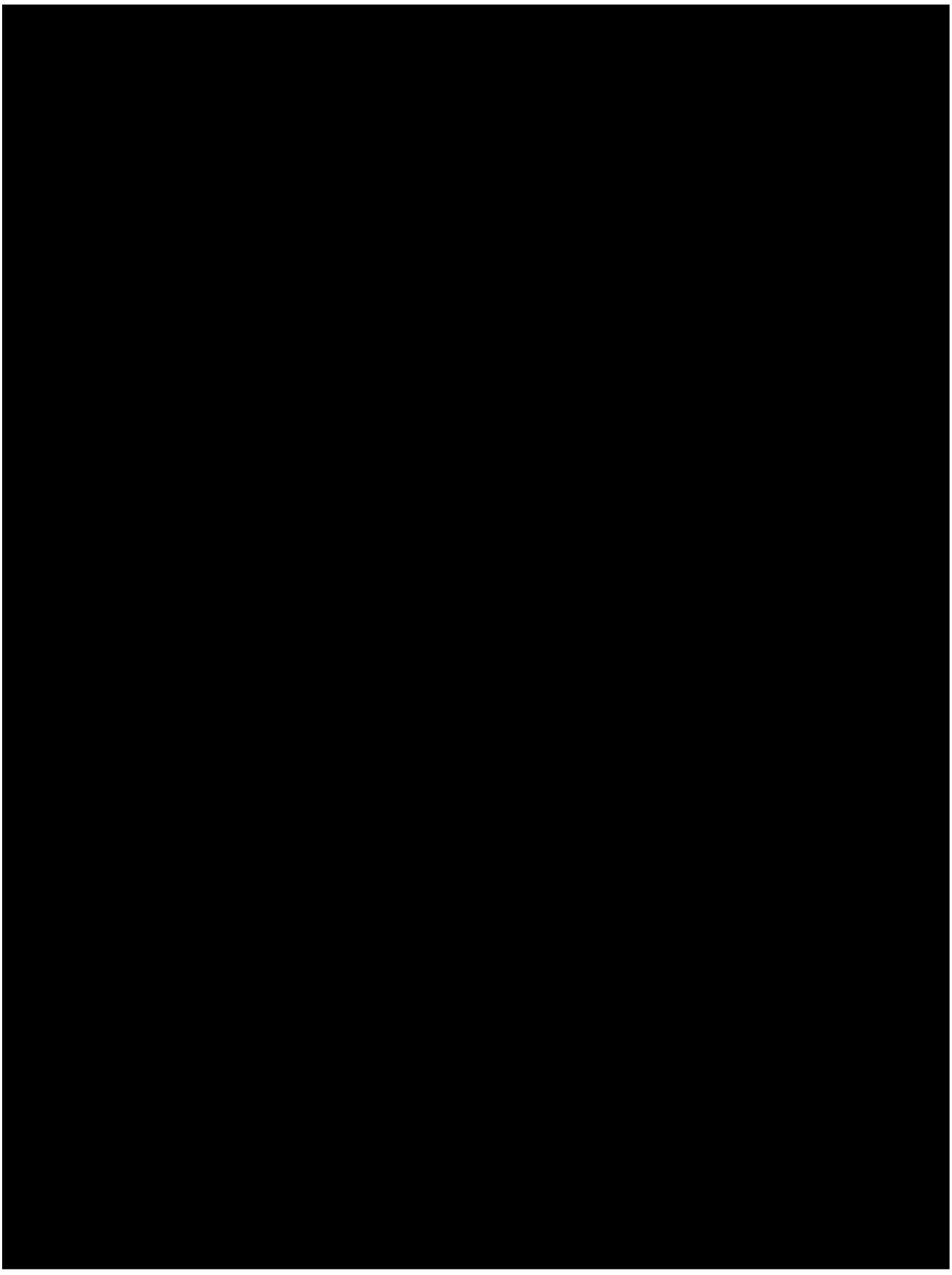
Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

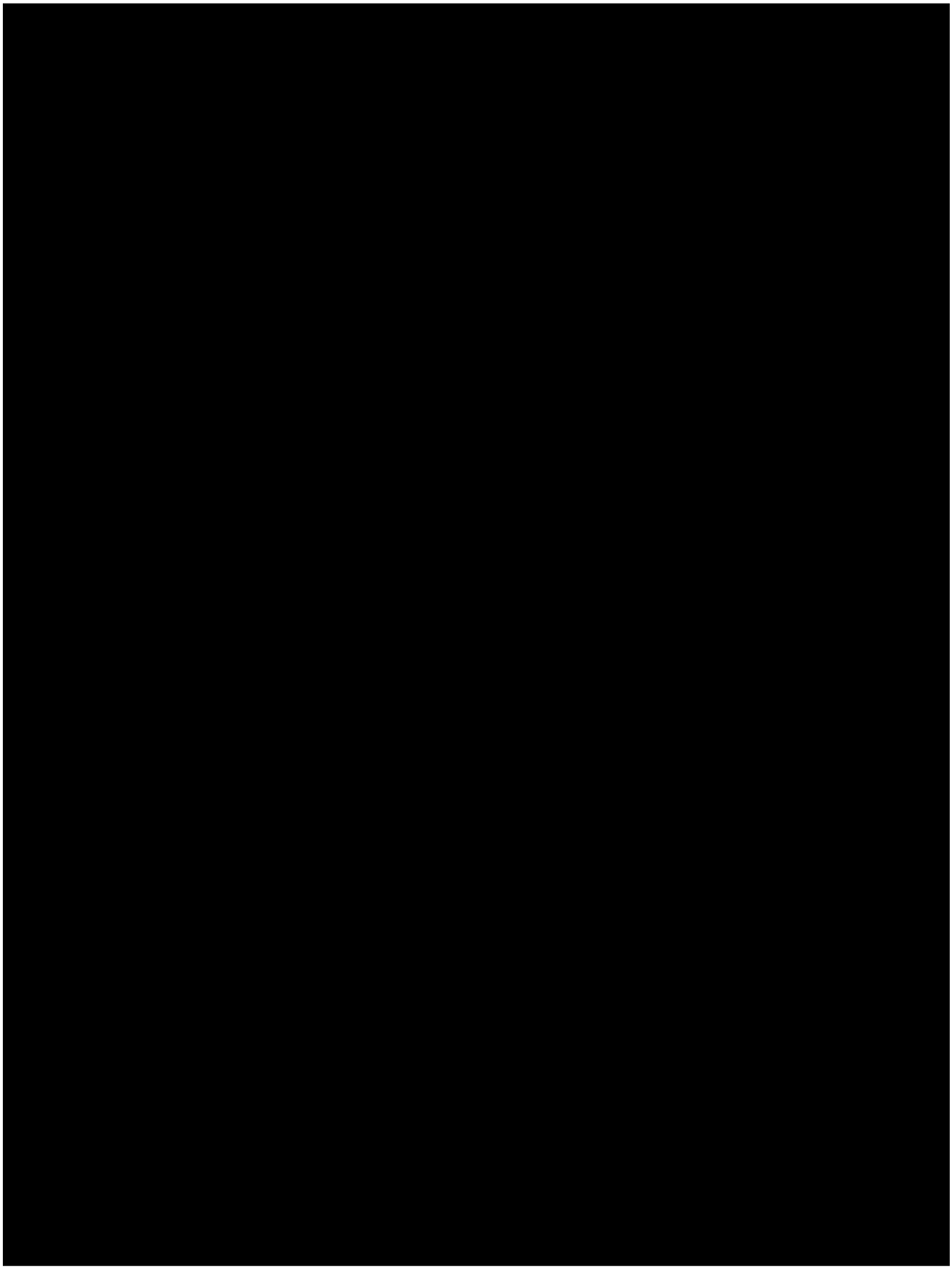
[redacted]

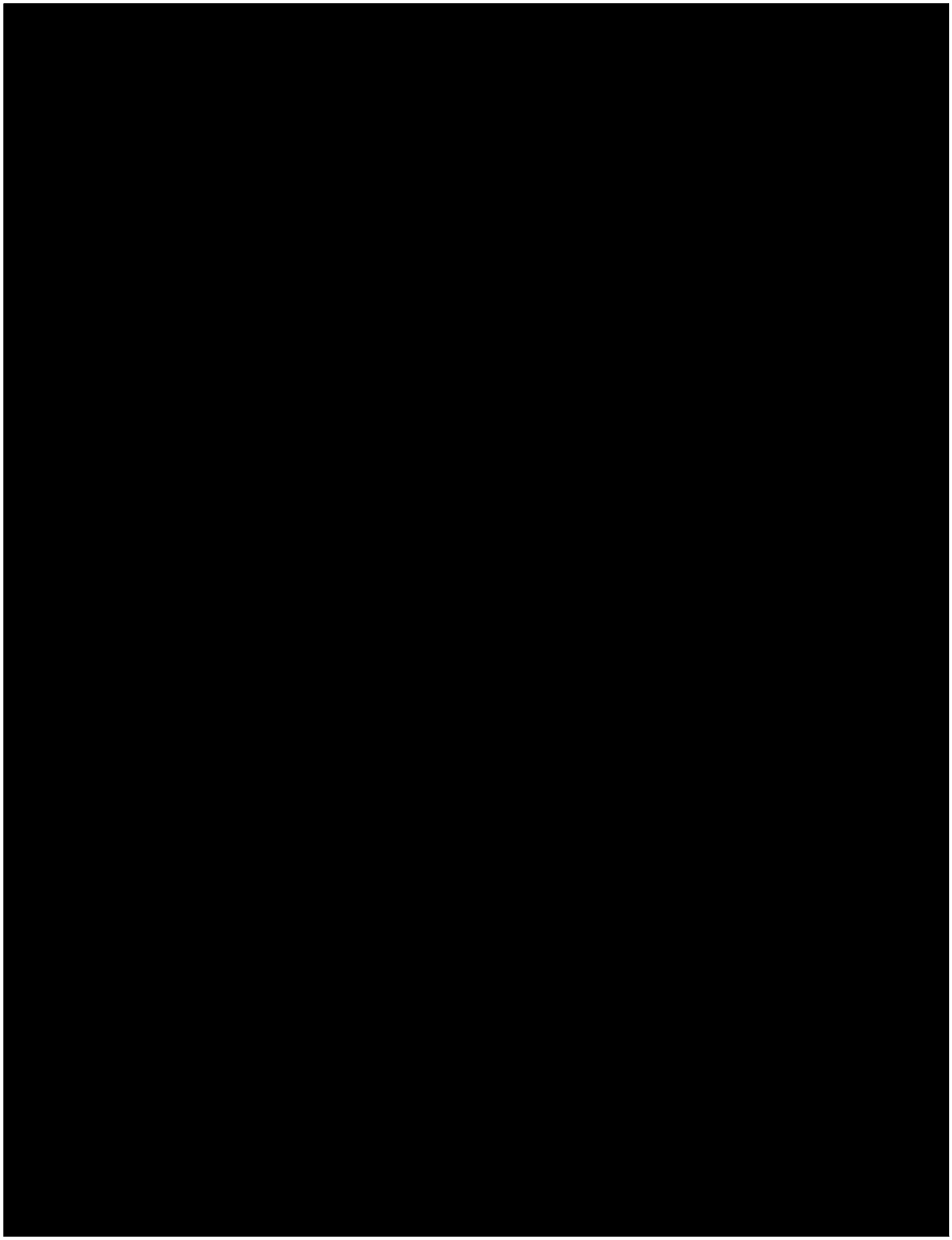
REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero, and NovaSource	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, and NovaSource	Added critical equipment to Att. 3 and other content that contained placeholders that were needed to meet the initial submittal deadline.









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ATTACHMENT 5: PRE-WINTER CHECKLIST

Date performed	
Completed by (name)	

Pre-Winter Checks **Instructions**: Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Complete the *Winter Weather Equipment Inventory* and submit to the Site Manager and Compliance Manager.
☐	Conduct annual winter readiness training and drill with relevant operating personnel to review EOP and winter weather events from the previous winter season. Utilize and follow the annex during the training and drill. Collect feedback the EOP (if any) and, without unnecessary delay, provide Compliance Manager.
☐	Review work orders for cold weather preparedness preventative work to confirm they are scheduled for completion, as needed, prior to the onset of the winter season.
☐	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme cold weather event, including but not limited to scheduling and performing cold weather-related (e.g. check SF-6 gas pressure levels, transformer oil levels) maintenance prior to the beginning of winter and increasing surveillance during extreme cold weather events by scheduling tasks in the work management system.
☐	Notify the Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete winter weatherization.
☐	
☐	

ATTACHMENT 6: PRE-EVENT CHECKLIST

Date performed	
Completed by (name)	

Pre-Event Checklist **Instructions:** Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Monitor weather and weather alerts. Note in shift logs when a cold weather advisory has been issued, and subsequently recalled or released.
☐	For forecasted hurricane and tropical storm events, refer to the *Hurricane Annex*.
☐	Place severe weather protections in service where extreme cold weather could adversely impact Personnel, operations, or forced outage recovery.
☐	Establish communications with NSCR on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
☐	Verify appropriate cold weather PPE for field personnel.
☐	Review staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
☐	Monitor temperatures and take actions to limit or prevent reliability impacts to instrumentation and equipment due to extreme cold.
☐	Site Manager to schedule and conduct meeting with field personnel to discuss the weather forecast and to keep all personnel alerted to possible weather conditions.
☐	
☐	

ATTACHMENT 7: EXTREME COLD WEATHER CHECKLIST

Date performed	
Completed by (name)	

ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES IMMEDIATELY FOR ASSESSMENT

Extreme Cold Weather Checklist **Instructions:** Answer each item and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed			
Item #	**Item**	**Complete? Yes, No, or N/A**	**Notes** Include any follow-up activity required.
1.	Review outstanding preventative work orders and perform necessary and immediate work needed to protect the facility.		
2.	Establish staff responsibilities to monitor weather and weather alerts.		
3.	Establish communications with Personnel, including notification to Operating Personnel of potential facility outage, shutdown, or curtailment		
4.	Check that all critical equipment is operating and protected per the manufacturer's recommendations during extreme cold weather events. Emphasize the points at the facility where cold weather impacts can occur (e.g. building piping, heat tracer piping, transformer oil levels).		
5.	Refer to **Critical Equipment Matrix** (Attachment 3) and plan preventative and response actions based on forecasted conditions, which should include notifications to Personnel.		
6.	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements (e.g. checking insulation thickness, quality, and proper installation, building entrances, windows, etc.).		
7.	Check equipment inventory and replenish all quantities. Refer to **Winter Weather Equipment Inventory** attachment. Be sure to check all First Aid kits and confirm PPE "in use" dates.		
8.			
9.			

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

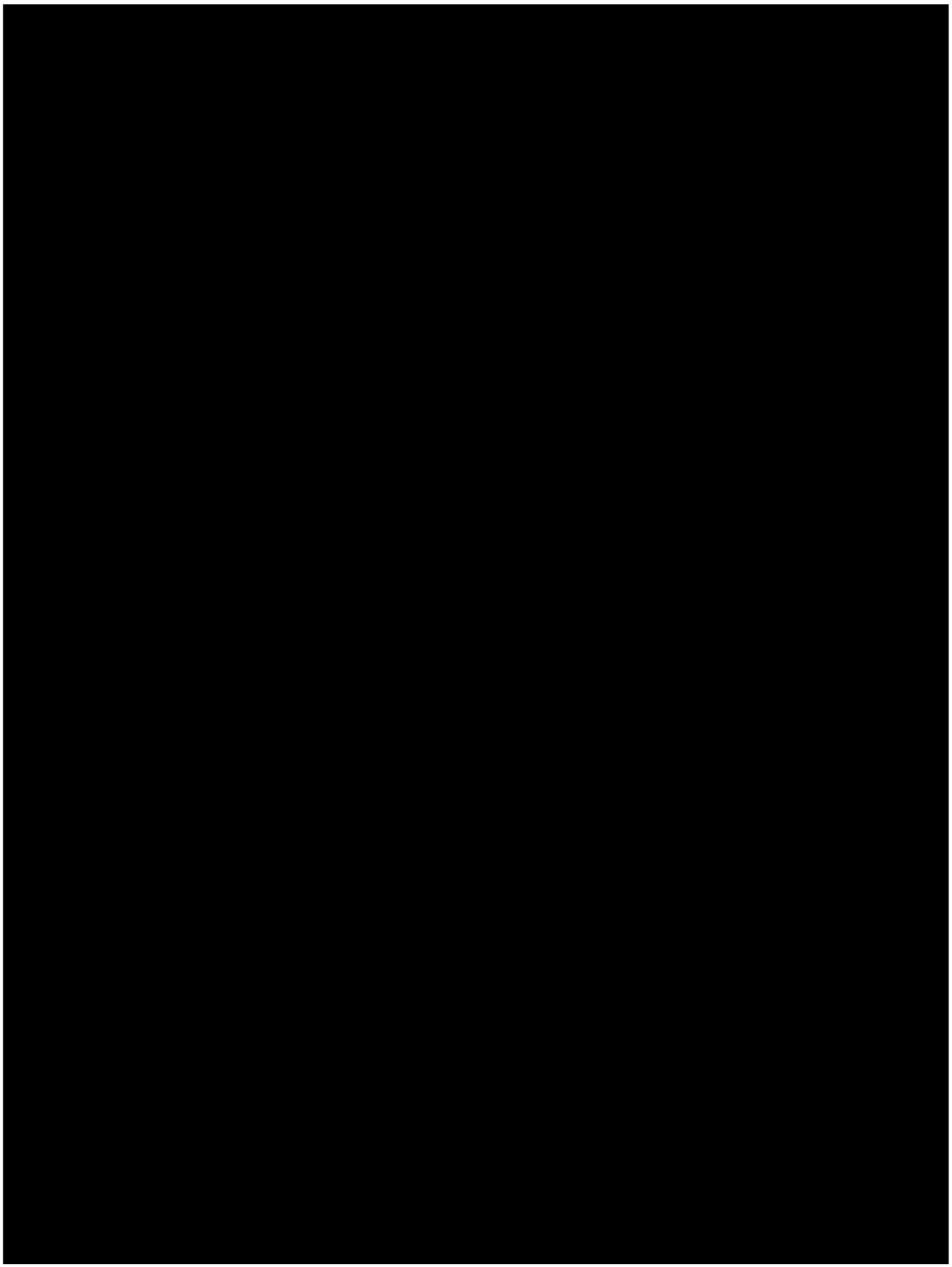
1.1 Introduction

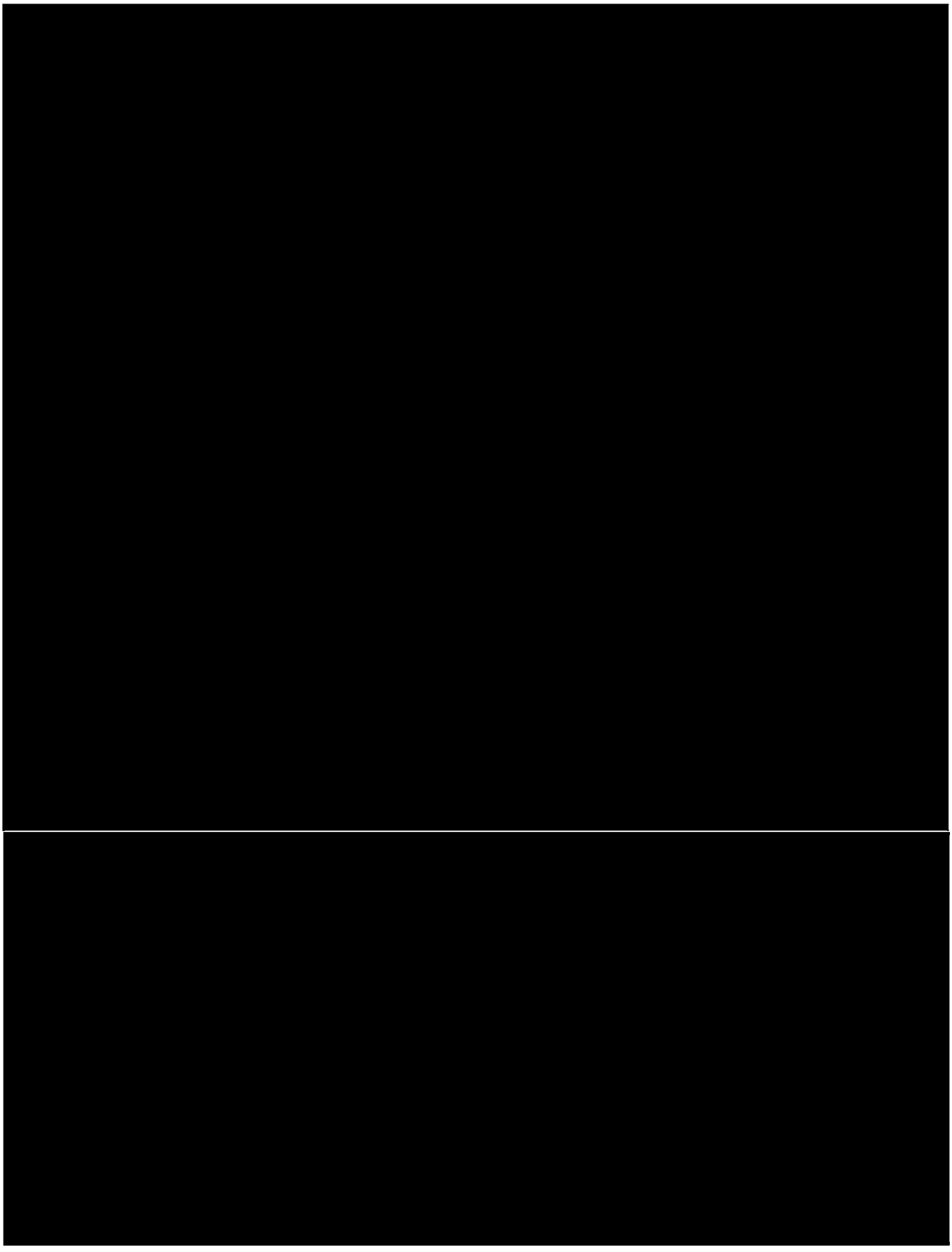
This annex provides guidance and direction to Madero specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents.

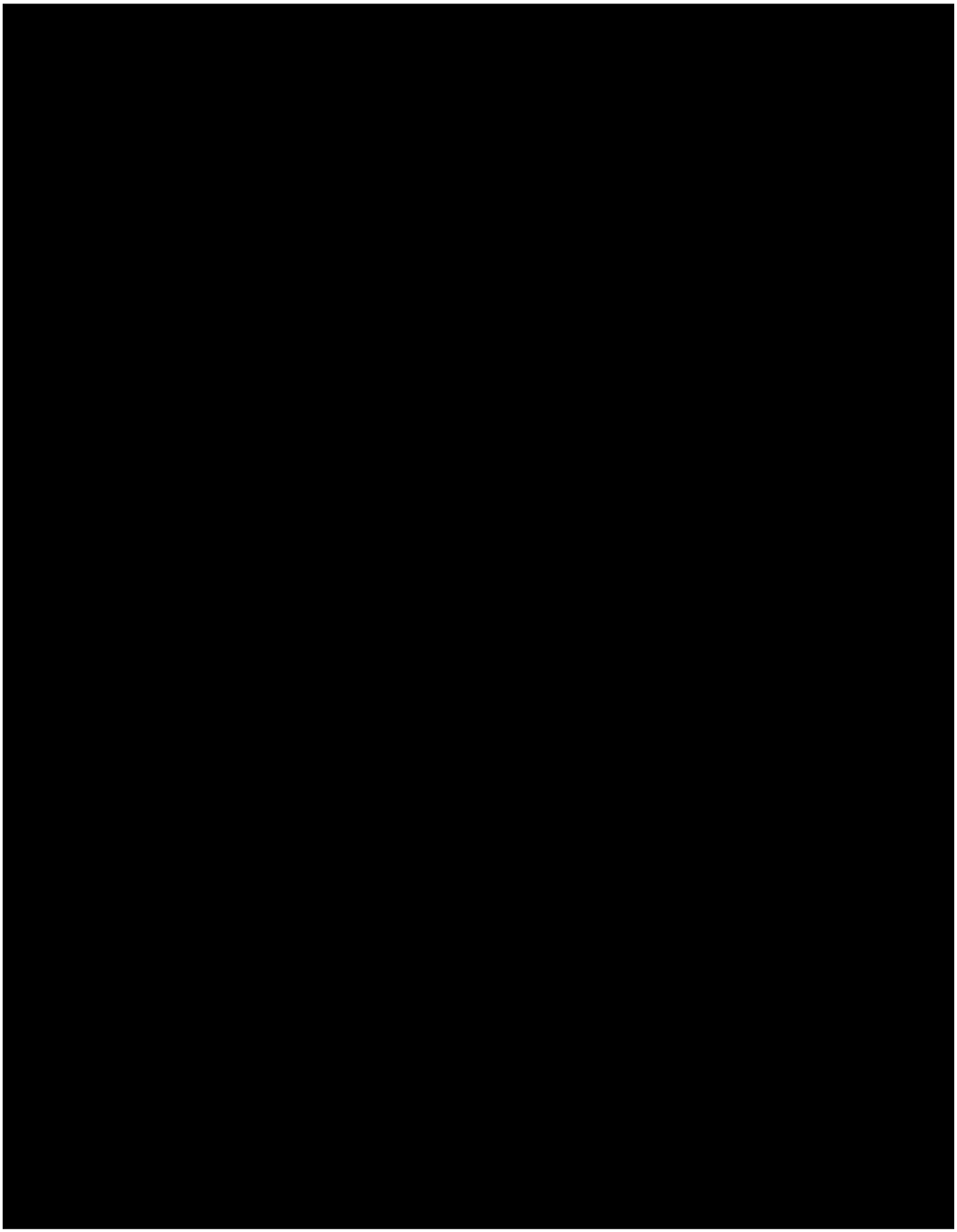
Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

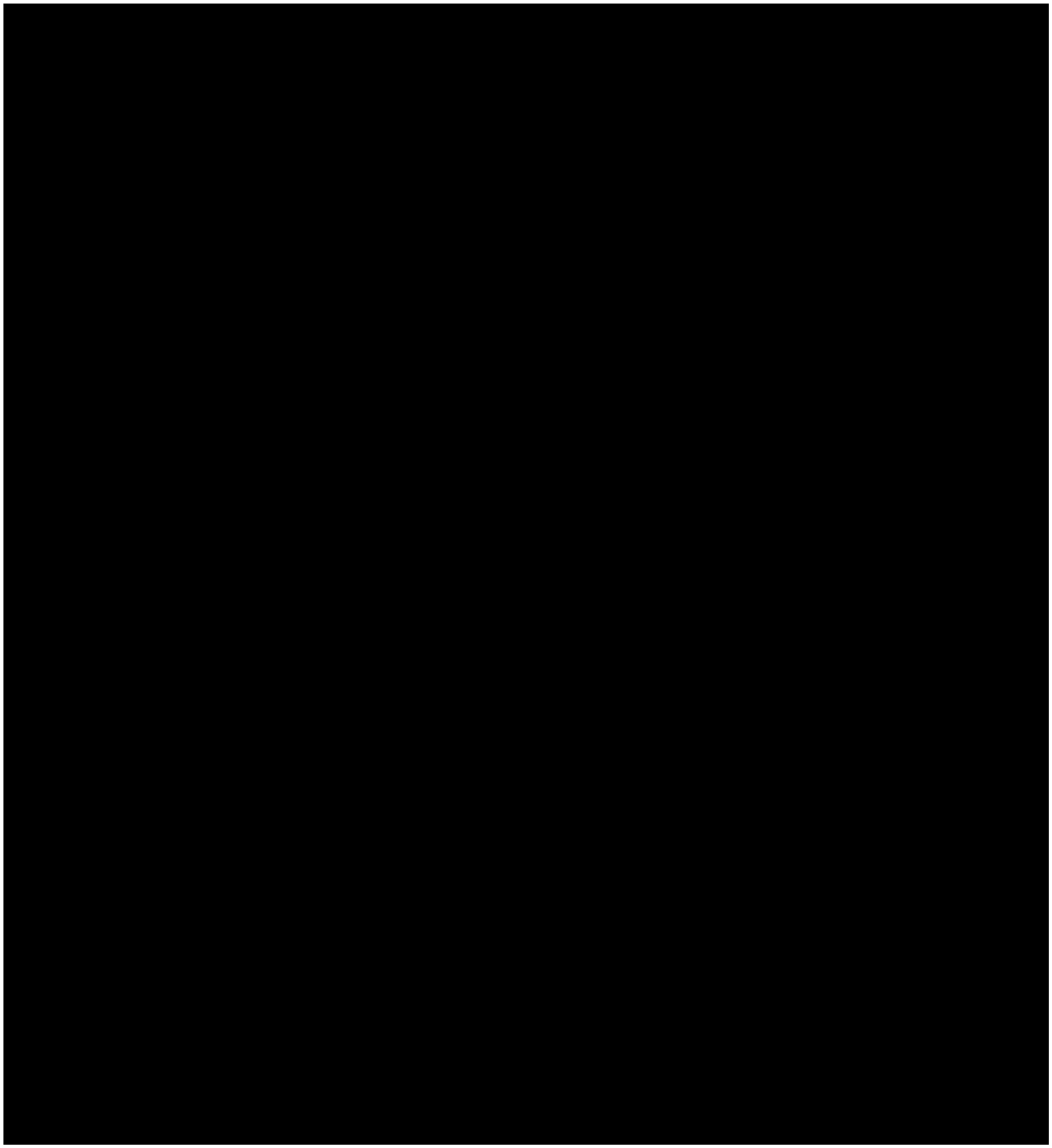
Any questions regarding the EOP should be directed to the Madero Compliance Manager.

B. Roles and Responsibilities









4.0 RESOURCES AND RELATED DOCUMENTS

Madero Emergency Operations Plan

Madero Cold Weather Annex

Madero Hot Weather Annex

Madero Hurricane Annex

Madero Pandemic and Epidemic Annex

Department of Energy (DOE)

Office of Cybersecurity, Energy Security & Emergency Response web page:
https://www.oe.netl.doe.gov/oe417.aspx

- DOE-417 Online Submissions and DOE-417 Form and Instructions are located on this web page.
- The Online Submissions link allows a user to include NERC System Awareness and the E-ISAC on the submittal; if the user has a login account, they can include additional recipients as well as retrieve and update past forms.

NERC

https://www.nerc.com/pa/rrm/bpsa/Pages/default.aspx

ERCOT

Current Protocols - Nodal: https://www.ercot.com/mktrules/nprotocols/current

- **Section 16: Registration and Qualification of Market Participants**
- **Section 23 Form E, Notice of Change of Information:**
- **Section 23 Form O, Notice of Cybersecurity Incident**

Current Nodal Operating Guides: https://www.ercot.com/mktrules/guides/noperating/current

- **Section 3: ERCOT and Market Participant Responsibilities**

Texas RE

Texas RE Event Analysis webpage: https://www.texasre.org/reliabilityservices

- See "Event Contact Information" section under Event Analysis

PUCT

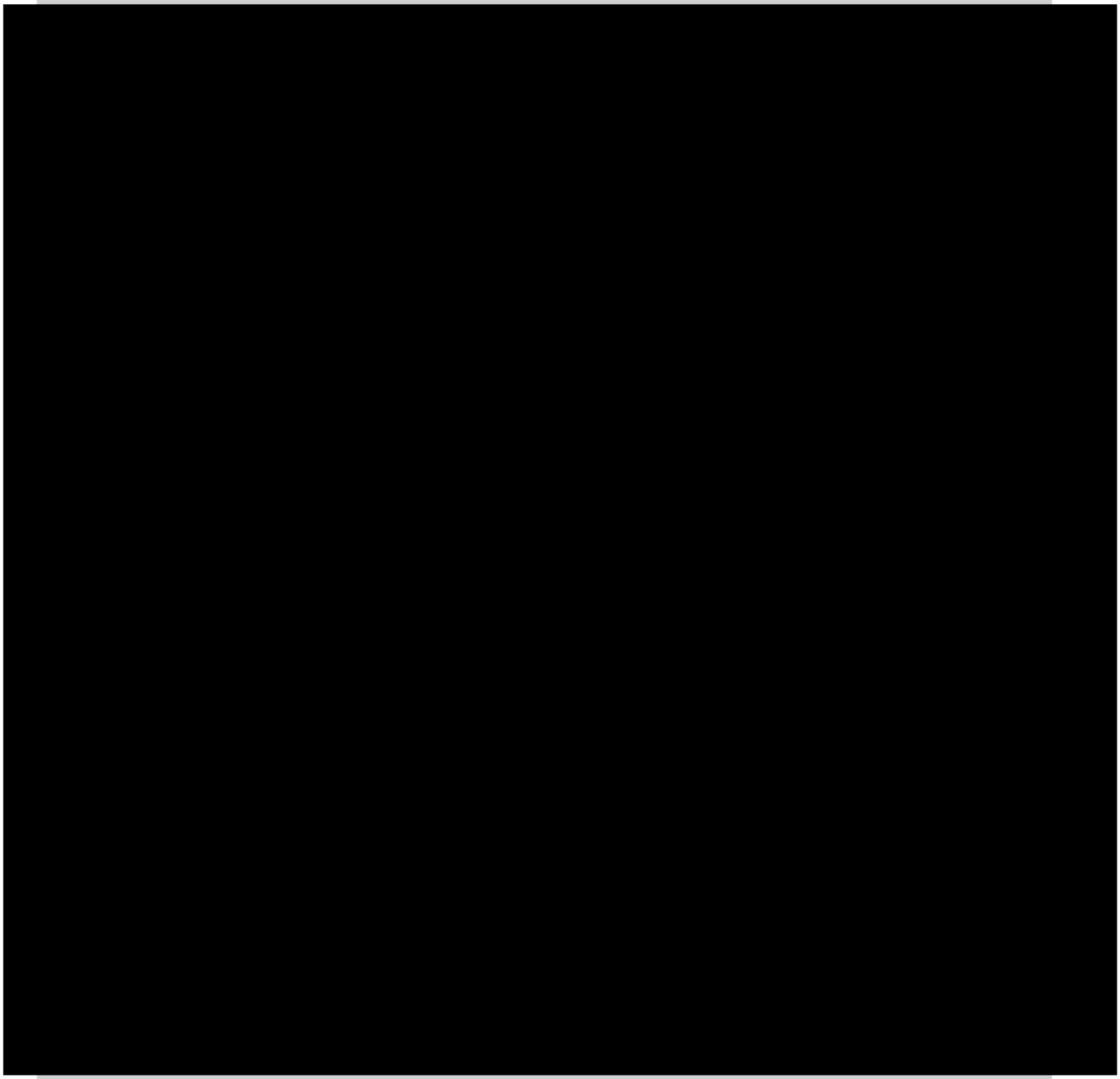
Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Update Form (posted under Emergency Management section)**:**
https://www.puc.texas.gov/industry/electric/forms/

5.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.



REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero, NovaSource (O&M) and NSCR (GOP)	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, NovaSource (O&M) and NSCR (GOP)	Document reviewed. No updates.

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This *Emergency Operations Plan* describes the policies and processes for Ignacio Grid LLC and Madero Grid LLC, each are registered as a Power Generation Company (PGC) with the Public Utilities Commission of Texas (PUCT), to follow during emergency operations in accordance with the requirements under Chapter 25, Subchapter C, §25.53, of Electric Substantive Rules.

This EOP addresses the requirements in *(d) Information to be included in the emergency operations plan*. Within this and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Madero Compliance Manager.

1.2 Applicability

This EOP, including all attachments, applies to and will be used by both Ignacio Grid LLC (PGC20669) and Madero Grid LLC (PGC20671) (collectively hereafter "Madero") to address common operational functions that are relevant across emergency types; the annexes address specific emergencies. Ignacio and Madero have jointly created its emergency operations plan and all annexes and these documents satisfy the §25.53 rule requirements for each entity.

1.3 Statements of §25.53 Non-Applicability

Section	Statement of Non-Applicability
(e)(2)(A)(ii) Adequacy and operability of fuel switching equipment	Madero does not have the capability to perform fuel switching and has no installed equipment to do so.
(e)(2)(B) Water Shortage Annex	Madero does not utilize water in the generation of electricity.

1.4 Generation Resource Information and Location

Madero is located in Hidalgo County, Texas and is interconnected to Sharyland Utilities, LLC at the 138kV Sharyland Railroad Substation. NovaSource Power Services is the registered Generator Operator (GOP) as well as the operations and maintenance (O&M) provider.

Facility Name	Resource Entity Name	ERCOT Resource Name	Nameplate Rating	Commercial Operations Date (est.)
Madero	Madero Grid LLC	MADERO_UNIT1	114.24 MVA	6/15/2022

Facility Name	Resource Entity Name	ERCOT Resource Name	Nameplate Rating	Commercial Operations Date (est.)
	Ignacio Grid LLC	MADERO_UNIT2	114.24 MVA	6/22/2022

B. Roles and Responsibilities

1.5 Madero Compliance Manager

1.5.1 Role – The Madero compliance manager and owner of the EOP.

1.5.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Madero's business objectives and addresses requirements. The PUCT requires that this EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in the EOP are completed, in concert with the NovaSource Site Manager.
- Reviews and approves the EOP annually.
- Maintains evidence.

1.6 NovaSource Power Services (NSPS) Site Manager

1.6.1 Role – the manager of the team contracted to perform the O&M services at the Madero Facility.

1.6.2 Responsibilities include:

- Ensure the requirements and processes laid out in the EOP are followed by site Personnel.
- Lead Field Services in the execution of the EOP and set expectations with Field Service Technicians for safe and reliability operational performance of the facility.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Oversee the day-to-day operation of the Madero facility.

- Ensure annual drill requirements are met and submit evidence to Madero upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Madero by the end of each calendar year.
- Provide evidence to Madero Compliance Manager upon completion and request.

1.7 NSPS Field Services

1.7.1 Role – Contracted to perform the O&M services at the Madero Facility.

1.7.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Site Manager and Compliance Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-incident reviews.

1.8 NovaSource Control Room (NSCR) Operating Personnel

1.8.1 Role – The registered Generator Operator (GOP) for the Madero facility.

1.8.2 Responsibilities include:

- Operates the Madero site from the NSCR operations center in Chandler, Arizona.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Provide notifications to ERCOT, QSE, Reliability Coordinator, etc. as required.
- Submit evidence to Madero upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

C. Approvals

The approval signatures in this section indicate review of the document and approval to publish.

[redacted]

D. Revision Control Summary

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero, and NovaSource	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, and NovaSource	Updated content that contained placeholders that were needed to meet the initial submittal deadline. Updated Attachments to reference the NSPS Power Plant O&M Health and Safety Plan (HASP), where appropriate.

2.0 COMMUNICATION PLAN

The table below covers all of the entities that are required under (d)(2)(B) that Madero, as an entity with generation operations, may communicate with as applicable to its entity.

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

Entity	Statement of applicability for PGC	Communication Procedure
Media	PGC does not authorize communication with the media by Madero or its supporting personnel.	PGC does not authorize communication with the media by Madero or its supporting personnel.
PUCT	PGC may need to respond to requests for information by commission staff.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Office of Public Utility Council (OPUC)	PGC is unlikely to need to respond to requests for information.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Fuel Suppliers	As a BESS facility, the PGC does	Not Applicable to the PGC

Entity	Statement of applicability for PGC	Communication Procedure
	not utilize fuel suppliers.	
Local & State Governmental Entities, officials, and emergency operations center	PGC may need to respond to requests for information.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Reliability Coordinator(RC)	The PGC may need to communicate with the RC, as requested, and per the ERCOT Protocols.	As described in the Roles and Responsibilities section of the EOP, only NSCR Operating Personnel may communicate with the RC.

3.0 PLAN FOR PRE-IDENTIFIED SUPPLIES FOR EMERGENCY USE

Each of the annexes applicable to the PGC, including the *Cold Weather Annex*, *Hot Weather Annex*, and *Hurricane Annex,* contain a list of supplies that are unique to the content of the annex and are completed pre-season and/or pre-event. The plan for identifying and maintaining supplies is to utilize the checklists pre-and during season, as needed, to account for and stock supplies.

The *Cyber and Physical Security Incident Annex* does not require pre-identified supplies. If the need arises during a cyber or physical security incident to obtain supplies, then the Site Manager and the Compliance Manager will coordinate to obtain them.

The *Pandemic and Epidemic Annex* contains a planning assumption that additional funding will be made available for the acquisition of necessary equipment. Based on the recommendations from local, state, and/or federal government officials, the Crisis Team identified in that Annex will work to define and obtain needed supplies.

4.0 PLAN TO ADDRESS STAFFING DURING EMERGENCY RESPONSE

Each of the annexes applicable to the PGC contains a section for consideration of staffing during an event and, as appropriate, contains items to review and confirm staffing availability before (if possible) and during an event. Staffing during emergencies occurs on a case by case basis, and will be evaluated by the Site Manager to determine if staffing outside of normal levels is appropriate, safe, and warranted.

See Section 8.0 Business Continuity – Critical Failure Points – Personnel (Staffing) for detailed information on the plan for staffing during an emergency and the defined critical personnel.

5.0 IDENTIFICATION OF WEATHER-RELATED HAZARDS

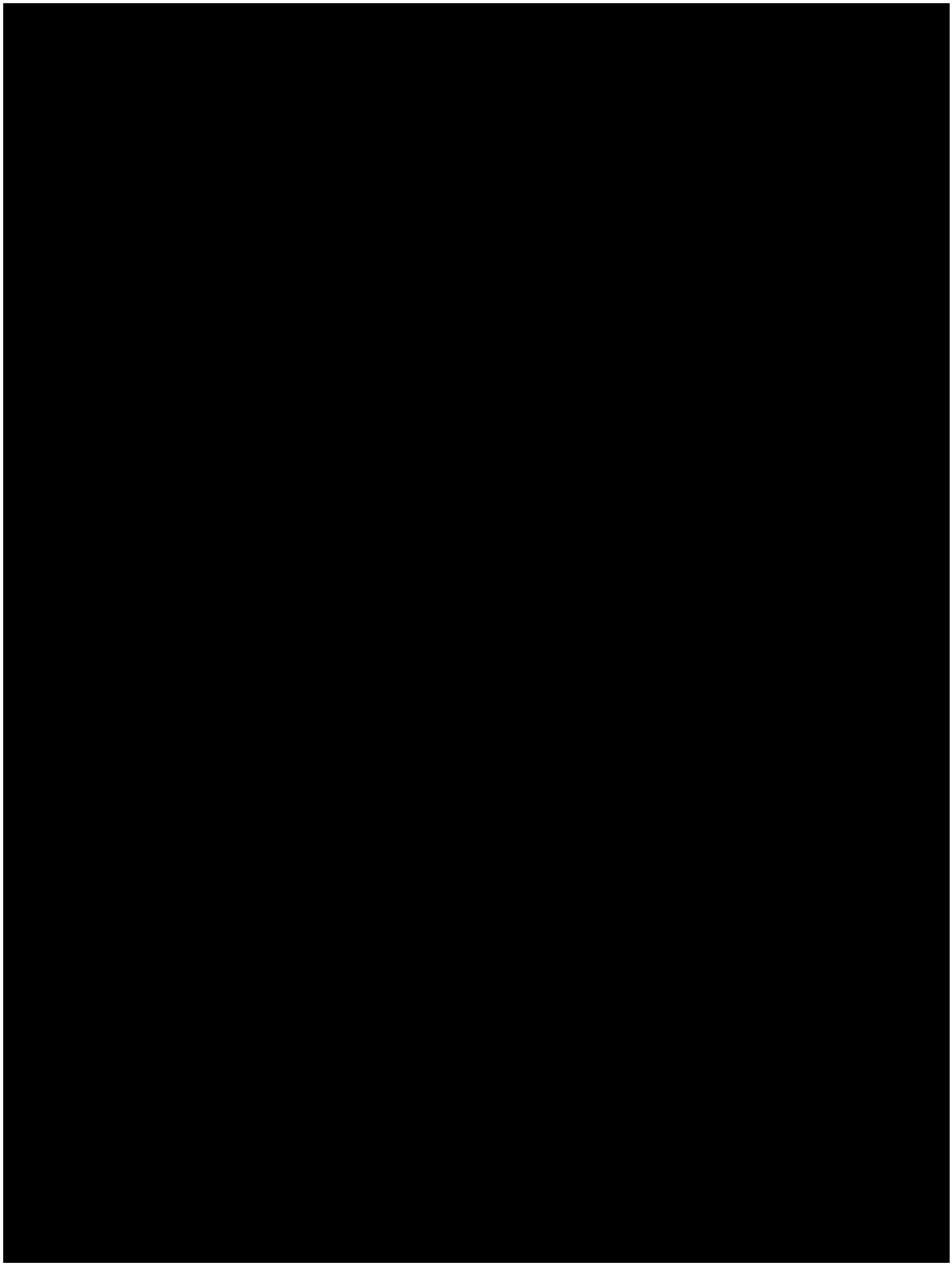
Each of the annexes applicable to the PGC is built to identify weather-related hazards specific to its PGC. The annexes are built on site-specific data, including information provided by the State, County, and regional emergency managers, as well as a consideration of local conditions as documented and published online (e.g. the review of a county or city Hazard Mitigation Plan). See each annex for the identification of the sources used to identify hazards specific to it's PGC.

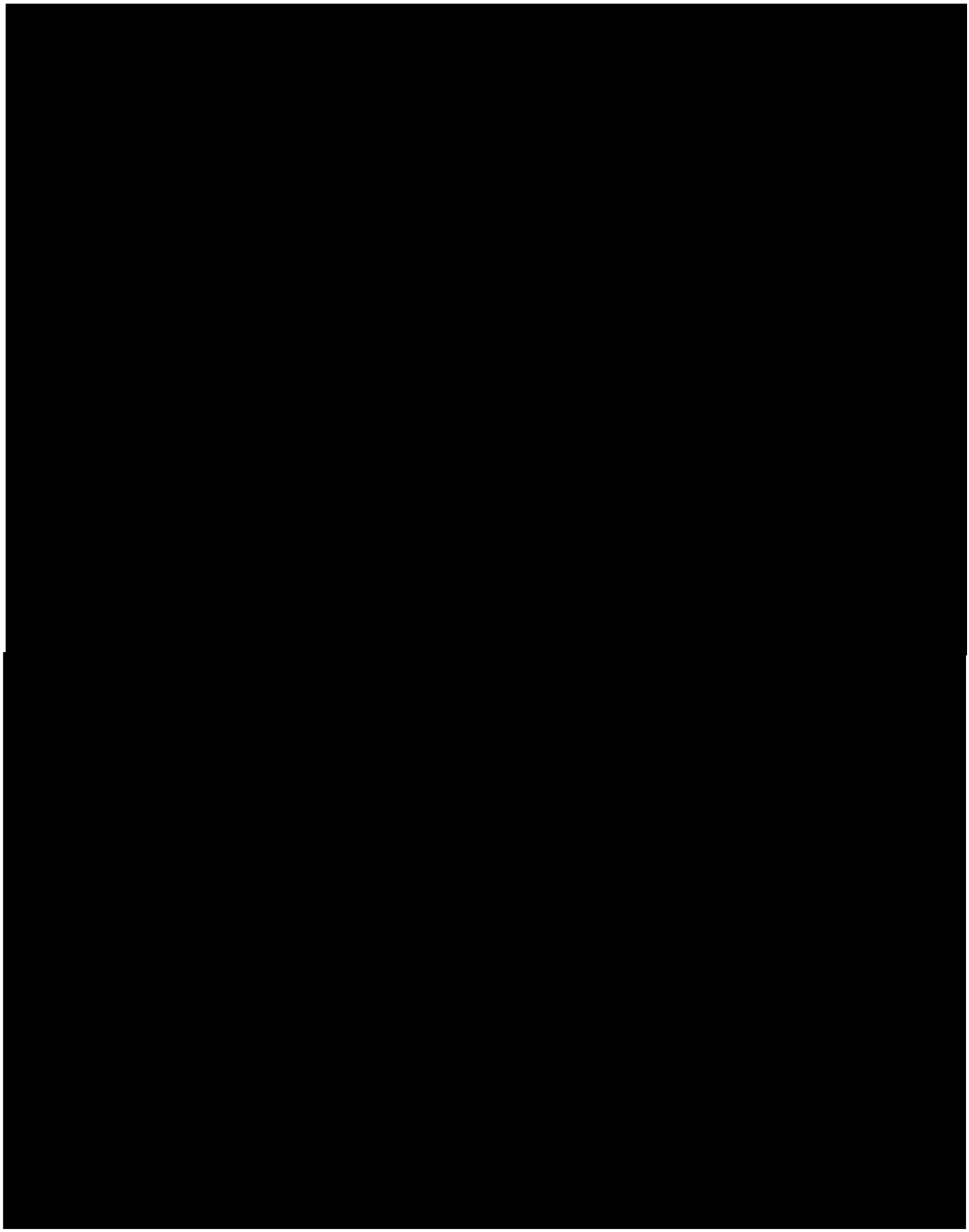
Also see Section 9.0 Severe Weather Planning and Identification, and Section 9.2 Seasonal Events, for the detailed plan on the site will continuously monitor and identify real-time weather-related hazards.

6.0 PROCESS FOR ACTIVATING THE EOP

Upon determination that any of the events contained within the EOP are imminent or in-progress, the NSPS Site Manager shall activate the EOP and the appropriate annex(s).

7.0 CRITICAL FAILURE POINTS - EQUIPMENT





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9.0 SEVERE WEATHER PLANNING AND IDENTIFICATION

Events and disturbances that can occur in and around the facility include but are not limited to windstorms, severe thunderstorms, flooding, tornadoes, excessive heat, excessive cold, snowstorms, and ice storms. These weather events can be detrimental to the employees and or equipment and structures at the facility. Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization annexes, to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those annexes.

Post-event, the Site Manager and Field Services Technicians will assess the damage and report the current generating capability of the site (priority for recovery of generation capacity) to NSCR Operating Personnel.

9.1 Pre-season planning

Ahead of each summer and winter season, the Site Manager ensures that the appropriate weather annex and *Hurricane Annex* is reviewed, and the pre-season preparedness checklists are completed, signed, and provided to the Site Manager. Annual review of the checklists is documented and stored in specified database or information repository. This activity coincides with the required ERCOT reporting, per the Nodal Protocols. Checklists specific to the *Cold Weather Annex* and *Hot Weather Annex* are contained within those specific documents. For event response checklists for other scenarios, see the appropriate Attachment included in this EOP.

9.2 Seasonal events

Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Site Manager and NSCR are responsible for keeping abreast of forecasted severe weather events and reporting potential issues to the Site Manager and has several means to monitor these weather-related emergencies. Information may be ascertained from any of the following available sources:

- Internet access to weather-related websites;
- Onsite weather and telemetry systems;
- AM/FM radio to monitor local news;

- National Weather Service; and
- National Oceanic and Atmospheric Administration (NOAA)

The Field Technician will have weather applications on their phones that are used for lightening and weather alerts. Additionally, site personnel will have two-way radios that receive NOAA weather alerts.

When information is received that a severe weather event such as a tornado, severely hot or cold weather, or flood watch has been issued for the facility area, the following actions shall be taken:

1. The on-site Field Technician should notify the Site Manager.
2. The Site Manager or NSCR shall make a determination whether or not the facility should be shut down due to the potential weather event(s), with consultation with Madero Compliance Manager if time permits.

The *Cold Weather Annex* and *Hot Weather Annex* contain the inventory of pre-arranged supplies needed for emergencies. These annexes are separate documents from this EOP.

9.3 Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the facility administrative building, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility and maintain communications with the Site Manager, NSCR, and others.

10.0 RESTORATION OF SERVICE

[redacted]

11.0 REQUIRED EOP DRILL

11.1 Requirement for an Annual Drill and EOP Update

The PUCT requires that Madero conduct or participate in one or more drills each calendar year to test its EOP. Because Madero is in a hurricane evacuation zone (as defined by TDEM), at least one of the annual drills shall include a test of its *Hurricane Annex*.

Following an annual drill the entity must assess the effectiveness of its emergency response and revise its EOP, as needed. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

11.2 Notification to PUCT and TDEM District Coordinators Prior to Conducting Annual Drill

At least 30 days prior to the date of at least one drill each calendar year the following notifications must be made of the 1) date, 2) time, and 3) location of the drill.

- Commission staff must be notified (using the method and form prescribed on the commission's website).
- Appropriate TDEM District Coordinators, by email or other written form.

11.3 Drill Requirements

11.3.1 The content of each drill will be based on current needs and will be determined by the Site Manager with input from the Compliance Manager, as needed.

11.3.1.1 The annual drill must include a documented evacuation of the O&M/Substation control building (if applicable).

11.3.2 A roster of drill attendees, the date the drill was conducted, and the location of the drill will be filed with this plan and retained in the Madero document repository.

11.3.3 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provide to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

11.4 EOP Updates

11.4.1 Following the annual drill, the effectiveness of the drill and the EOP will be assessed and the EOP updated, as needed, based on feedback received and provided to the Compliance Manager by the Site Manager or designated personnel.

11.4.2 Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the Madero EOP evidence.

12.0 ANNUAL TRAINING AND REPORTING REQUIREMENT

The PUCT requires that all relevant operating personnel be familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Contractors and visitors who will enter operating areas of the facility will be trained on facility alarms, mustering locations, and evacuation procedures before they enter the facility for the first time, and at least annually thereafter.

At the end of each calendar year, the NSPS Site Manager will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and

2. Dates of access to or training on the EOP, as appropriate.

13.0 FILING OF EMERGENCY CONTACT INFORMATION WITH THE PUCT

Madero is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, Madero must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form. See *Resources and Related References* section for Emergency Contact Annual Report and Form links.

14.0 REQUIRED ANNUAL PLAN UPDATE

The Filing Requirements in §25.53 required that information in this EOP and all supporting documents must be updated annually, and no later than March 15, for various circumstance, including, but not limited to the following:

- Changes were made in the previous calendar year that will materially affect how Madero would respond in an emergency.
- An entity that in the previous calendar year did not make a change that materially impacts how Madero would respond must also file with the PUCT.

15.0 REQUIRED REPORTING

15.1 Requirement to update EOP Information no later than March 15 Annually

Madero is required to continuously maintain its EOP and must annually updated information within the EOP no later than March 15.

15.1.1 If EOP changes were made in the previous calendar year that materially affects how Madero would respond to an emergency, the following items must be completed:

15.1.1.1 File an executive summary with the commission;

15.1.1.2 File a complete, revised copy of the EOP with all confidential portions removed; and

15.1.1.3 Submit to ERCOT the revised unredacted EOP it its entirety.

15.1.2 If no EOP changes were made in the previous calendar year that materially affect how it would respond to an emergency, the following items must be completed:

15.1.2.1 A pleading that documents any changes to the list of emergency contacts, as required;

15.1.2.2 An attestation stating that no changes were made to the EOP that material affects how it would respond to an emergency; and

15.1.2.3 The required affidavit.

If commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency, Madero will update the EOP and, if directed by commission staff, file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.

15.2 Reporting During Activation of the State Operations Center by TDEM

Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.

15.3 ERCOT Requirement for Annual Weatherization Declaration Submittals

Madero is required to submit declarations for both summer and winter weatherization preparations, per the Nodal Protocols, Section 22 (Attachment K and Attachment O).

Summary Table of Annual Weatherization Declaration Filing Requirements	
What must be filed:	**Filing due date:**
Summer Declaration, Attachment K	No earlier than May 1 and no later than June 1
Winter Declaration, Attachment O	No earlier than November 1 and no later than December 1

16.0 RESOURCES AND RELATED DOCUMENTS

Madero Hurricane Annex

Madero Cyber and Physical Security Incident Annex

Madero Pandemic and Epidemic Annex

Madero Hot Weather Annex

Madero Cold Weather Annex

ERCOT

Resource Entities webpage: http://www.ercot.com/services/rq/re

Current Protocols – Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination for Resource Entities with Natural Gas Generation Resources**
- **Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

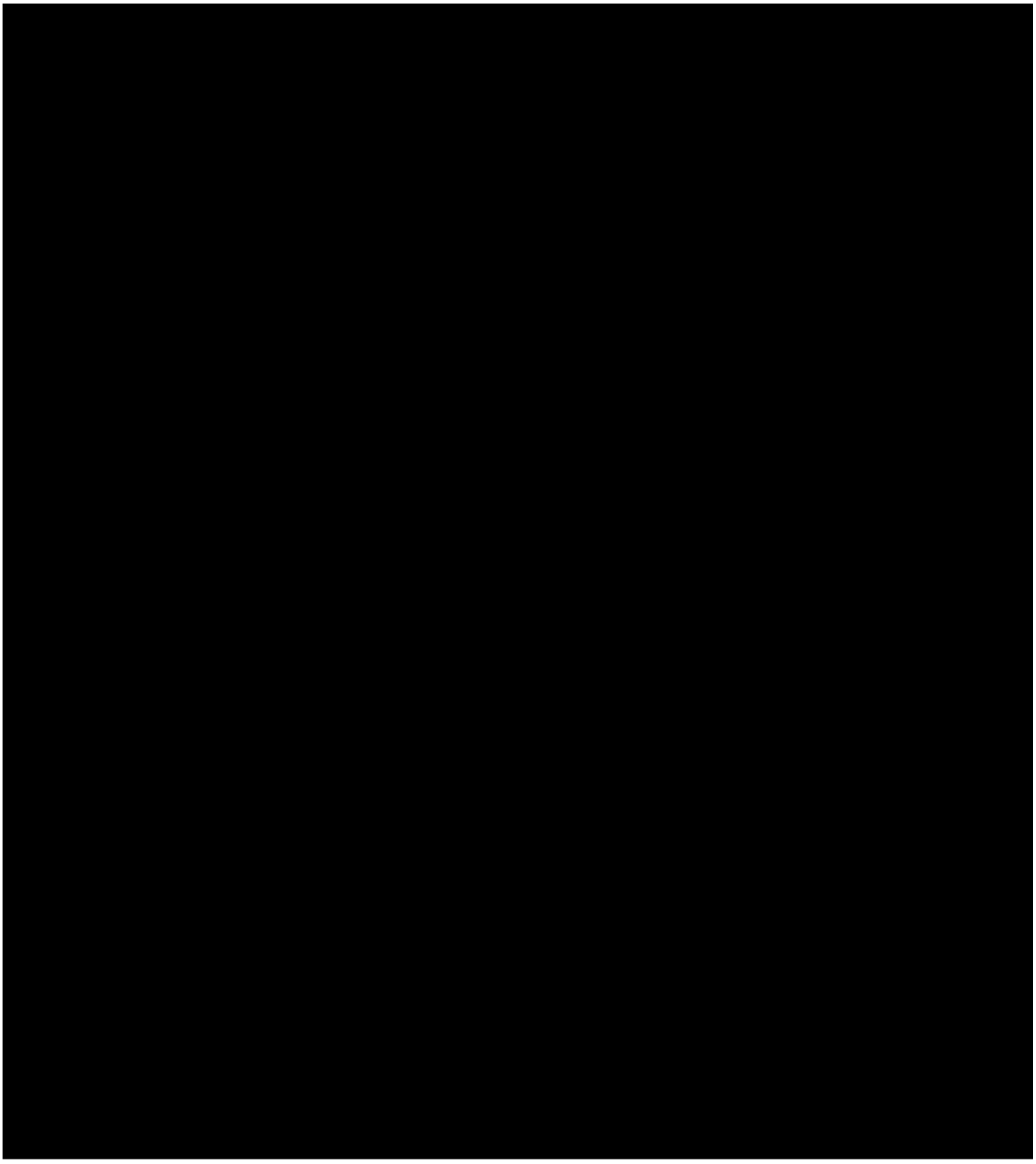
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Update Form (posted under Emergency Management section):
https://www.puc.texas.gov/industry/electric/forms/

17.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.



ATTACHMENT 3: MADERO GENERAL EMERGENCY PROCEDURES

[redacted]

NSPS Health and Safety Plan (HASP)

NSPS maintains a *Power Plan O&M Health and Safety Plan (HASP)* for Madero. The HASP should be utilized by site personnel to identify and respond to general emergencies as well as specific types of incidents covered within that document.

Hazardous Materials, Job Hazard Analysis, Personal Protective Equipment, Hazardous Energy Control, Electrical, Outdoor Safety, and Generation, Transmission, and Distribution Work Practices are all covered in the HASP.

It will be the responsibility of the Site Manager or lead Site Technician to assess a developing emergency situation and initiate the appropriate actions the HASP and the attachments of this Plan to protect personnel, the surrounding environment, and plant equipment from adverse damages.

If the event is a fire, medical, or police emergency, contact 911 immediately.

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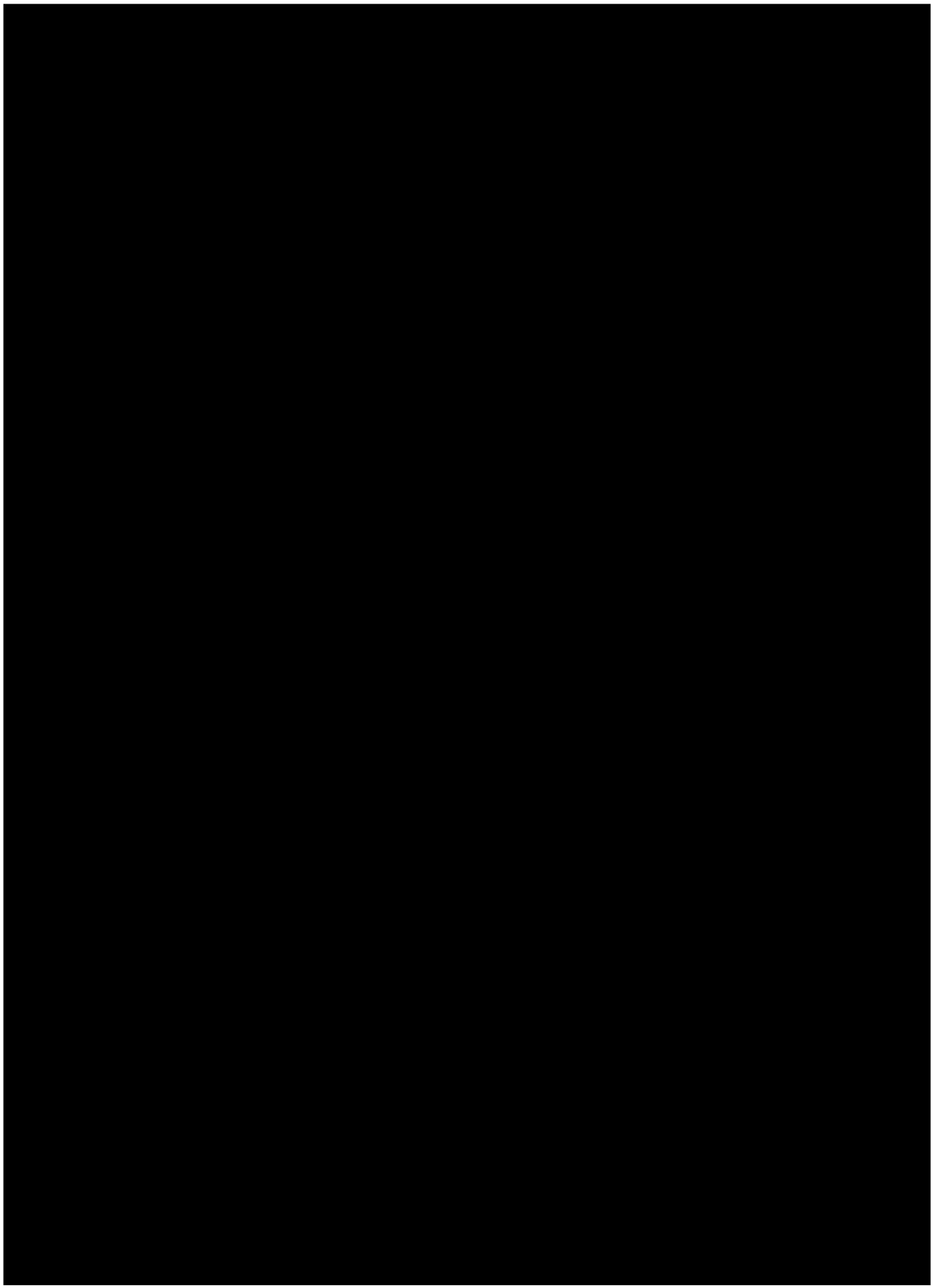

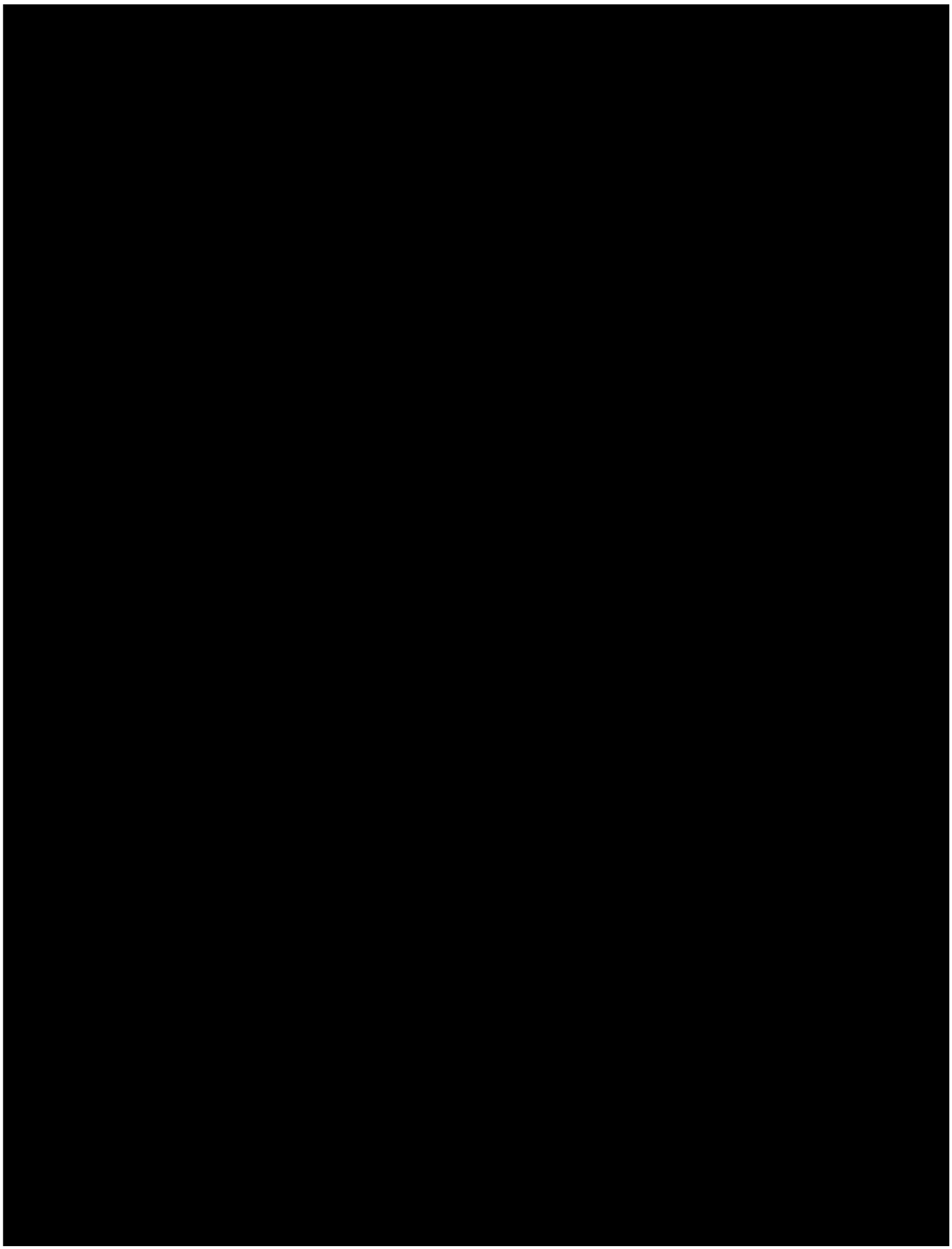

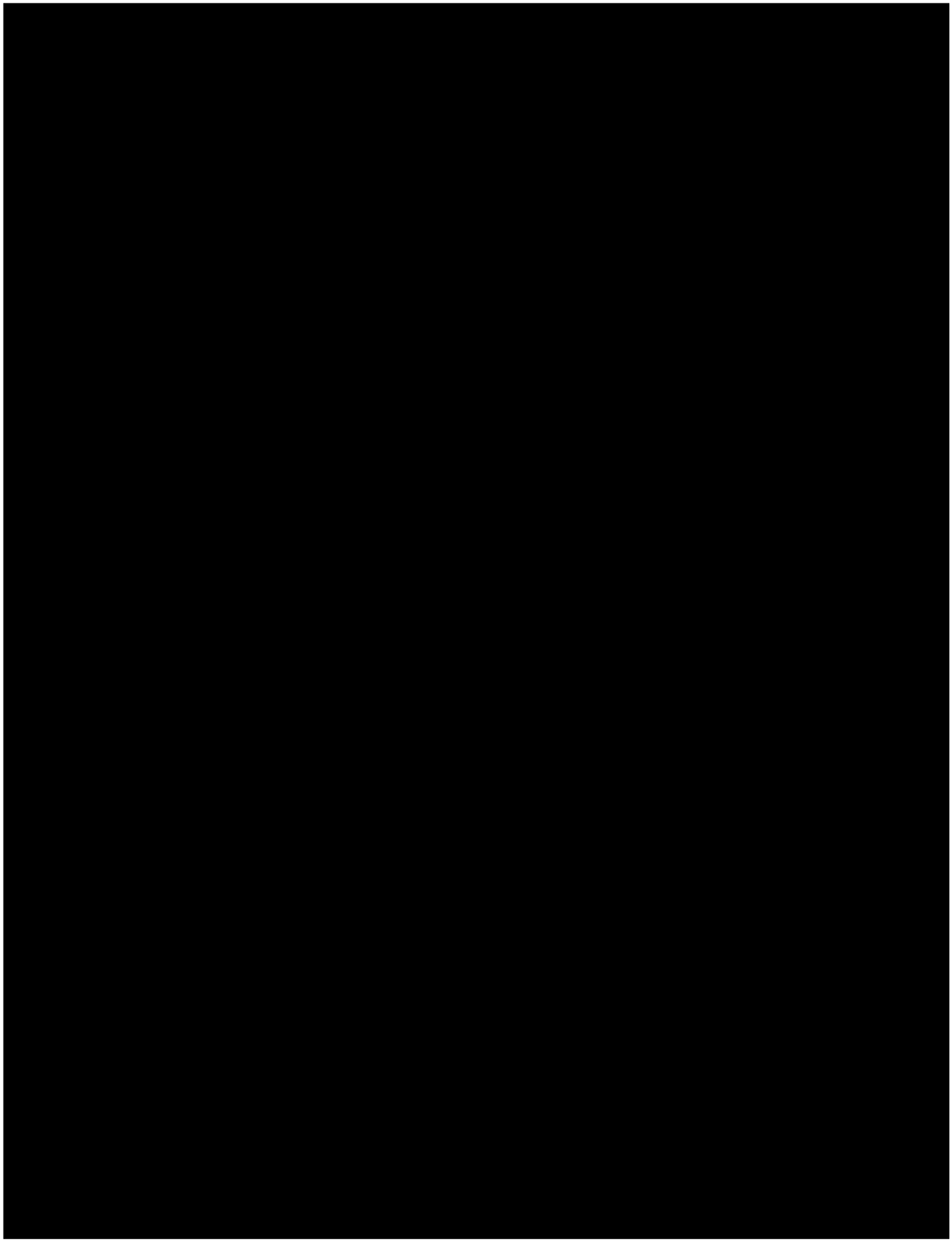

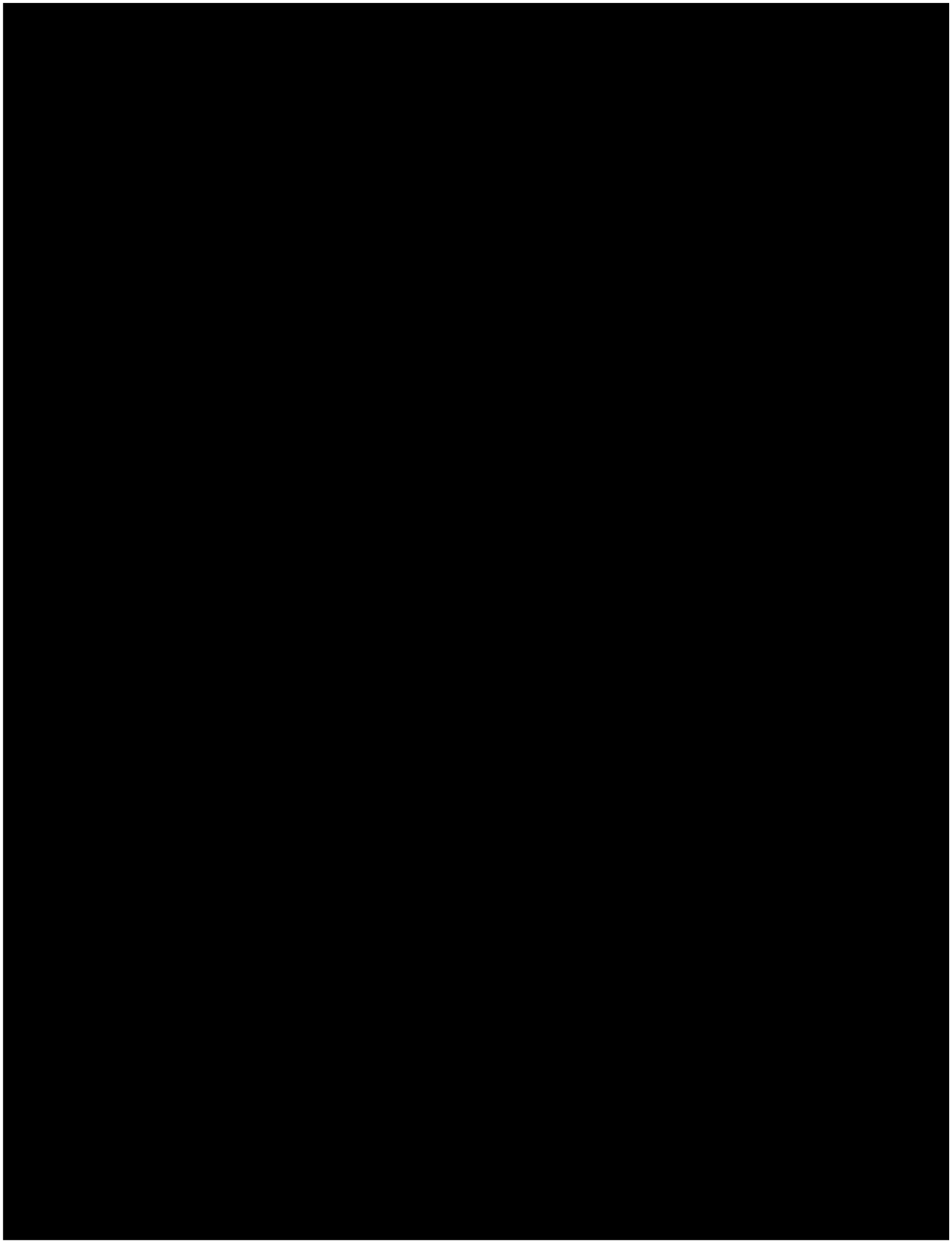

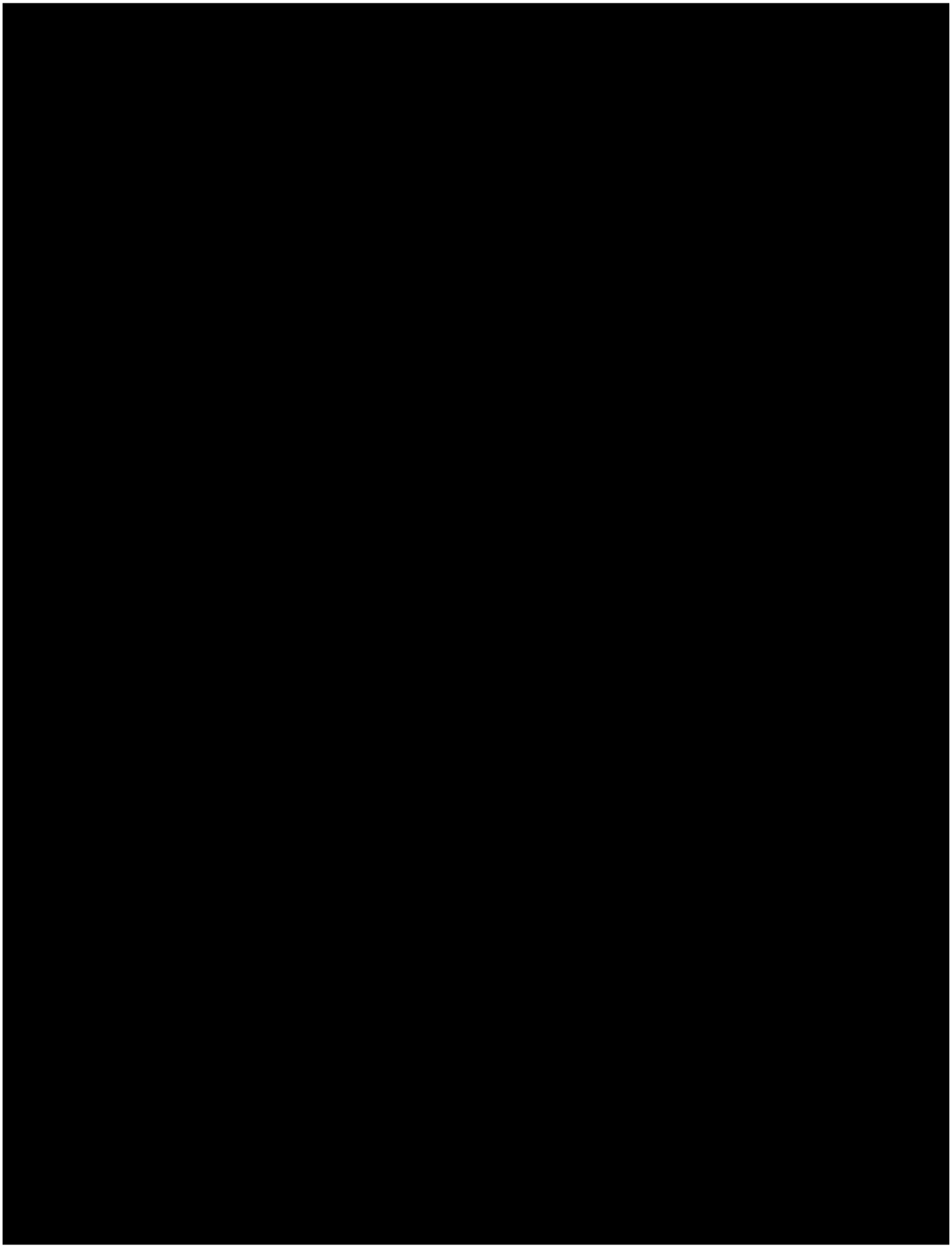

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ATTACHMENT 5: FIRE RESPONSE PLAN

Madero maintains this fire response plan which describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of facility personnel and minimize damages to facility equipment and the surrounding environment.

1. Any person on site who discovers a fire in the facility should immediately make contact with the Site Manager or lead Site Technician, and provide the following information:

    a) That a fire has been discovered.

    b) The location and source of the fire.

    c) Any injuries that have occurred

    d) The cause of the fire (if known)

    e) Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

    NOTE: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage if safe to do so. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a facility radio. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the **immediate action is to notify others over the radio and get help**.

2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire is in its incipient stage if it meets two primary criteria:

    a) The fire can be extinguished or controlled with a single portable fire extinguisher; and

b) The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.

3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. ***Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only***. (Note: All field/facility personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility. The *Fire Extinguisher Plot*, detailing the location of portable fire extinguishing equipment deployed at the facility, is provided at the end of this attachment. Additionally, the *Fire Hydrant/System Plot* details locations of key fire hydrants near or on the facility.)

4. In response to the fire, the Site Lead Technician/Lead Technician will need to make the following determinations:

   a) The equipment or activities that need to be shut down and/or ceased.

   b) If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Madero which consists of Madero Grid LLC and Ignacio Grid LLC specific to hot weather operations, planning, and emergency response. Madero does not have any fuel switching equipment nor does it use water in the generation of electricity.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Madero Compliance Manager.

B. Roles and Responsibilities

1.2 Madero Compliance Manager

1.2.1 Role – The Madero compliance manager and owner of the EOP.

1.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Madero's business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Reviews and approves the EOP annually.
- Maintains evidence.

1.3 NovaSource Power Services (NSPS) Site Manager

1.3.1 Role – the manager of the team contracted to perform the O&M services at the Madero Facility.

1.3.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-hot weather checks and summer season review activities have been complete.
- Oversee the day-to-day operations of the Madero facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hot weather preparation needs or deficiencies.
- Notify the Compliance Manager of weatherization tasks progress, scheduling, or concerns with meeting deadlines
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Madero upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Madero upon completion and by the end of each calendar year.
- Provide evidence to Madero Compliance Manager upon completion and request.

1.4 NSPS Field Services

1.4.1 Role – Contracted to perform the O&M services at the Madero Facility.

1.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Site Manager and Compliance Manager.
- Coordinate with and report facility weather-related information to Site Manager and NSCR Operating Personnel.
- Identify potential risk areas due to hot weather conditions and report opportunities to improve readiness and response to the Site Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.

- Participate in post-summer evaluations to assess the effectiveness of this annex and provide feedback.

1.5 NovaSource Control Room (NSCR) Operating Personnel

1.5.1 Role – The registered Generator Operator (GOP) for the Madero facility.

1.5.2 Responsibilities include:

- Operates the Madero site from the NSCR operations center in Chandler, Arizona.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Madero outage, shutdown, or curtailment
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Madero upon completion and request.
- Participate in training and drills.
- Participate in post-incident reviews, as appropriate.

2.0 LOCAL CONDITIONS

For comparison, at the McCallen Miller International Airport Station (~8 miles from Mission). The National Weather Service[1] data shows record high temperatures of 111°F (degrees Fahrenheit) in June 2017, 102°F in November 1988, and 101°F in February 2017. Record low temperatures are reported as 13°F in January of 1962, 18°F in December 1989, and 22°F in February 2021. The mean high temperature in August is 103°F and the mean low temperature in January is 33°F. There is no snowfall average reported in this location and total precipitation averages 22.64 inches. Records date back to 1961 for this location.

3.0 REQUIRED TIMELINES FOR HOT WEATHER/SUMMER PREPARATIONS

3.1 Pre-Summer Season Checks

Prior to **April 1** of each calendar year, Field Services will complete a *Pre-Summer Checklist*.

3.2 Pre-Event and Extreme Hot Weather Checks

Field Services will utilize and complete the *Pre-Event Checklist* upon recognition or notification of a possible weather-related event (e.g. extreme cold weather or otherwise). The *Extreme Hot Weather Checklist* will be utilized prior to the forecasted temperature reaching 103°F and/or

[1] https://www.weather.gov/wrh/Climate?wfo=bro

the possibility of extreme hot weather event. The process for activating the EOP and annexes, is documented in the *Emergency Operations Plan*.

5.0 HOT WEATHER PREPARATION AND RESPONSE PROCESSES

To support the facility's seasonal hot weather preparedness, address known critical failure points, and address the effects of equipment and facility weather design limitations, a number of checklists are provided to prepare and safeguard the facility. Field Services personnel will utilize these checklists to prepare for summer and respond to hot weather events.

5.1 Hot Weather Equipment Inventory List

Prior to the onset of the summer season and/or a severe hot weather event, Field Services personnel will ensure there are adequate inventories of all critical supplies, spare parts, equipment, and consumables that would aid in keeping the facility operational during severe hot weather events and responding to these events. Field Services personnel will use and complete the *Hot Weather Equipment Inventory* and provide the dated checklist as evidence that the inventory review was performed.

5.2 Pre-Summer Checklist

The *Pre-Summer Checklist* includes verifications of Field Services personnel readiness and review of this annex. These checklists are due within specified timeframes as they connect directly to required reporting to ERCOT and the PUCT.

5.3 Pre-Event and Extreme Hot Weather Checklists

The Pre-Event Checklist and the *Extreme Hot Weather Checklist* will be completed by Field Services personnel to verify communications and preparations are completed and that the facility's critical equipment is protected and functioning properly in advance of each forecasted extreme weather event.

5.4 Post-Event and Annual Review

After each extreme hot weather event and before the kickoff of the summer season preparations, Field Services personnel will utilize a review process to formally recognize procedural strengths, evaluate improvement opportunities, corrective actions needed, updates needed to address past weather emergencies, assessment of necessary supplies, and lessons learned, which will be incorporated into the EOP going forward.

Any work orders arising from this review process will also be implemented. All changes to these procedures and the EOP must be communicated to all appropriate personnel and regulators. In addition, the Site Manager will identify and communicate to the Compliance Manager any weatherization improvements that should be included for the subsequent year's budget.

5.5 Documenting Summer Season Preparedness Activities via Work Order Management

Field Services personnel will review its work management system to ensure adequate annual preventative work orders exist for summer season preparedness. Field Services personnel will also ensure: (i) all open corrective maintenance items that could affect facility operation and reliability in hot weather; and (ii) all hot weather preparedness preventative work orders are completed prior to the onset of the summer season.

5.6 Additional Staffing Consideration for Weather Events

The Site Manager will consider the need for enhanced staffing at the facility) during anticipated severe weather events. Planning for this staffing should include arrangements for transportation, lodging/meals, and in-house food inventories, as available. Site Manager will consider personnel hazard such as road conditions and other summer hazards when deploying Technicians to support the site (see section 7.0). Personnel safety is priority one.

[redacted]

7.0 HEAT-RELATED SAFETY INFORMATION

7.1 Personnel Safety

Personnel safety during extreme hot weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Personnel will stay informed of potential severe weather events and utilize the information in this annex to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme hot weather events.

7.2 Heat Exhaustion

7.2.1 Signs of heat exhaustion include:

- Heavy sweating
- Weakness
- Cold, pale, clammy skin
- Fast, weak pulse
- Nausea or vomiting
- Fainting

7.2.2 Response to a heat exhaustion illness should include the following actions:

- Move to a cooler location.
- Lie down and loosen clothing.
- Apply cool, wet clothes to as much of your body as possible.
- Sip water.

Seek immediate medical attention by calling 911 if you experience vomiting or if your symptoms get worse or last longer than an hour.

7.3 Heat Stroke

Heat stroke is a condition in which your body is unable to adequately cool any longer.

7.3.1 Signs of heat stroke include:

- High body temperature (103oF or higher)
- Hot, red, dry, or damp skin
- Headache
- Dizziness
- Nausea
- Confusion
- Loss of Consciousness

7.3.2 Response to heat stroke should include the following actions:

- Contact Emergency Services by calling 911 if you suspect heat stroke.
- Move person to a cooler place.
- Help lower the person's temperature with cool cloths or a cool bath.
- DO NOT give the person anything to drink.

7.4 Safety Procedures

7.4.1 During extreme hot weather events, facility Personnel should adhere to the following procedures.

7.4.1.1 Review heat stress training and related illness signs and symptoms with all personnel on at least a monthly basis during the summer months and prior to anticipated extreme hot weather events.

7.4.1.2 Take breaks in air-conditioned spaces

7.4.1.3 Wear loose, lightweight, light-colored clothing.

7.4.1.4 Wear hats when working outdoors.

7.4.1.5 Wear and reapply sunscreen as indicated on the package.

7.4.1.6 Regularly drink water to remain hydrated (two to four 8-ounce cups of water every hour while working).

7.4.1.7 Where possible, schedule outdoor work for earlier or later in the day to avoid the hottest part of the day.

7.4.1.8 Seek medical care immediately if you or a co-worker shows symptoms of heat-related illness.

9.0 ANNUAL TRAINING AND ANNEX REVIEW

It is imperative that all relevant operating personnel are familiar with and committed to following this annex, except to the extent that deviations are appropriate under the circumstances during an extreme hot weather event.

To that end, annual review and training will be conducted on hot weather and facility-specific awareness topics to support readiness for executing and implementing this annex. Training must use this annex and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by hot conditions.
- A review of hot weather health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended weather outlook.

All records of attendance for the annual training, drills, or exercises involving this annex will be retained in the Madero evidence repository.

10.0 ERCOT ANNUAL SUMMER WEATHER DECLARATION SUBMITTAL

10.1 ERCOT Requirement for Annual Summer Weatherization Declaration Submittal

10.1.1 Madero must submit a declaration between **May 1 and June 1** that it has completed or will complete all weather preparations required by this annex for equipment critical to the reliable operation of the Generation Resource during the summer time period (June through September).

10.1.1.1 If the work on the equipment that is critical to the reliable operation of the Generation Resource is not complete at the time of filing the declaration, the Resource Entity shall provide a list and schedule of remaining work to be completed. The declaration shall be executed by an officer or executive with authority to bind the Resource Entity.

10.1.2 Madero will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

11.0 RESOURCES AND RELATED DOCUMENTS

Madero Emergency Operations Plan

Madero Cold Weather Annex

Madero Cyber and Physical Security Incident Annex

Madero Hurricane Annex

Madero Pandemic and Epidemic Annex

ERCOT

Current Protocols - Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline for Resource Entities with Natural Gas Generation Resources**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

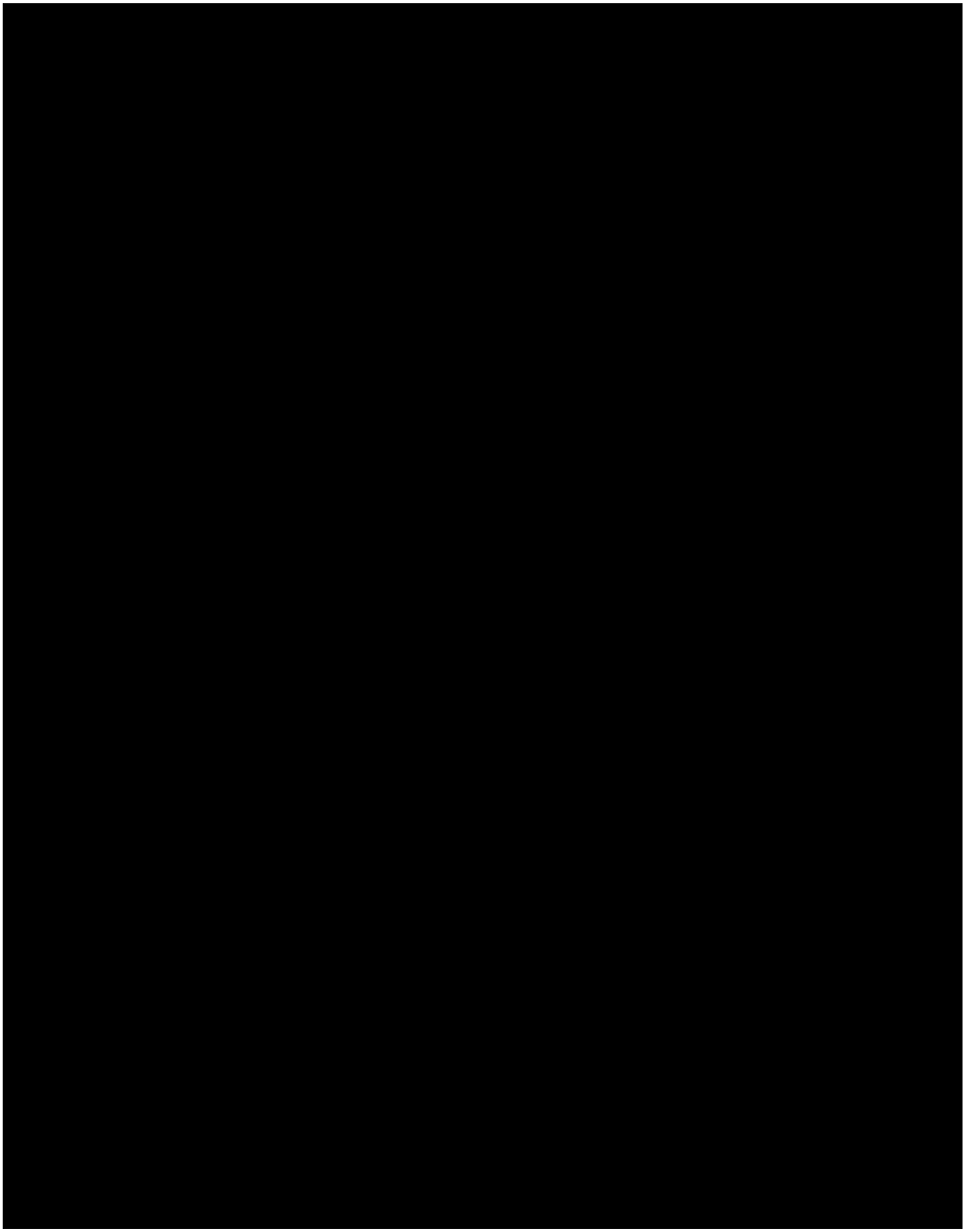
12.0 SECTION 25.53 DEFINITIONS

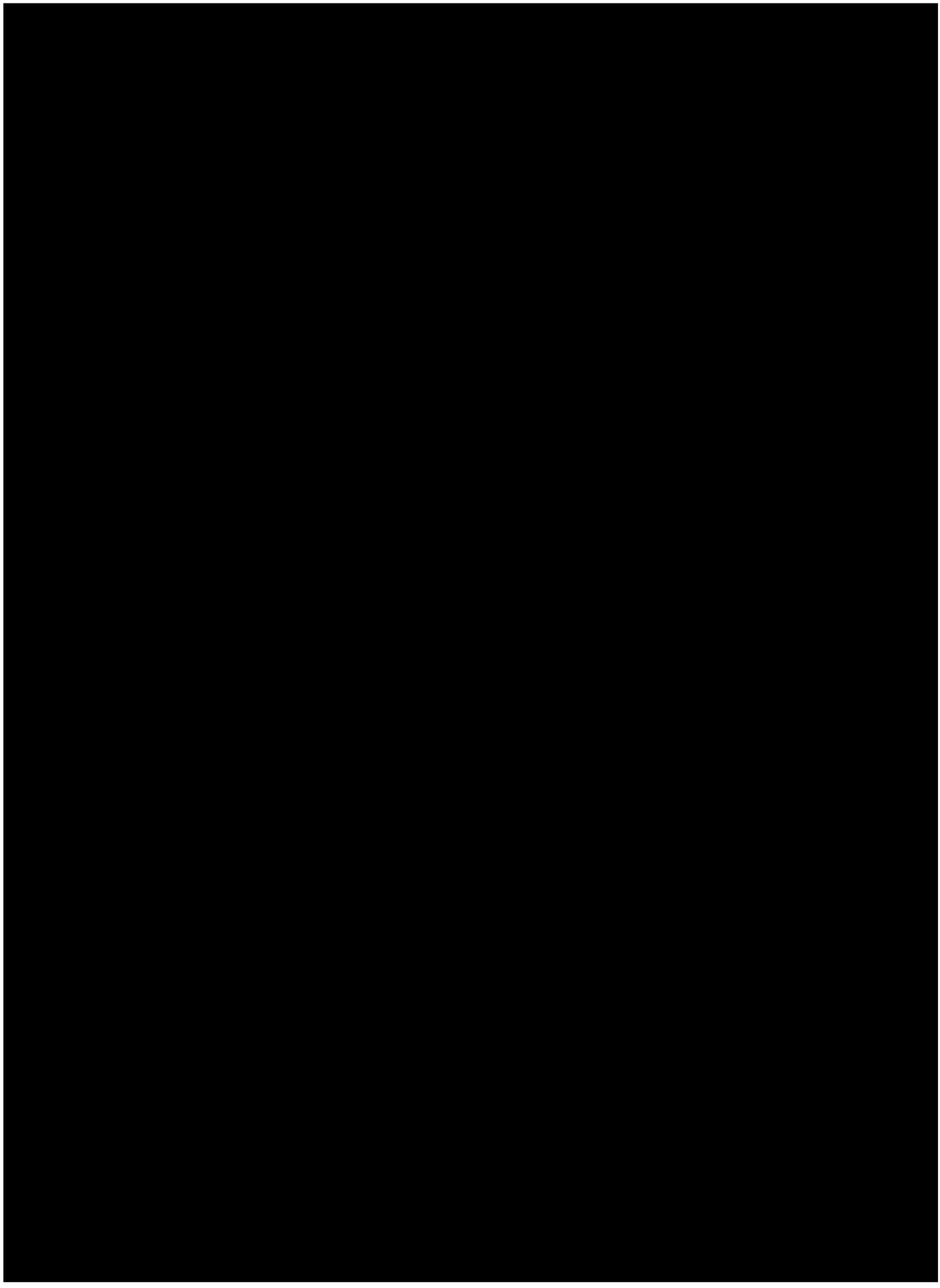
Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

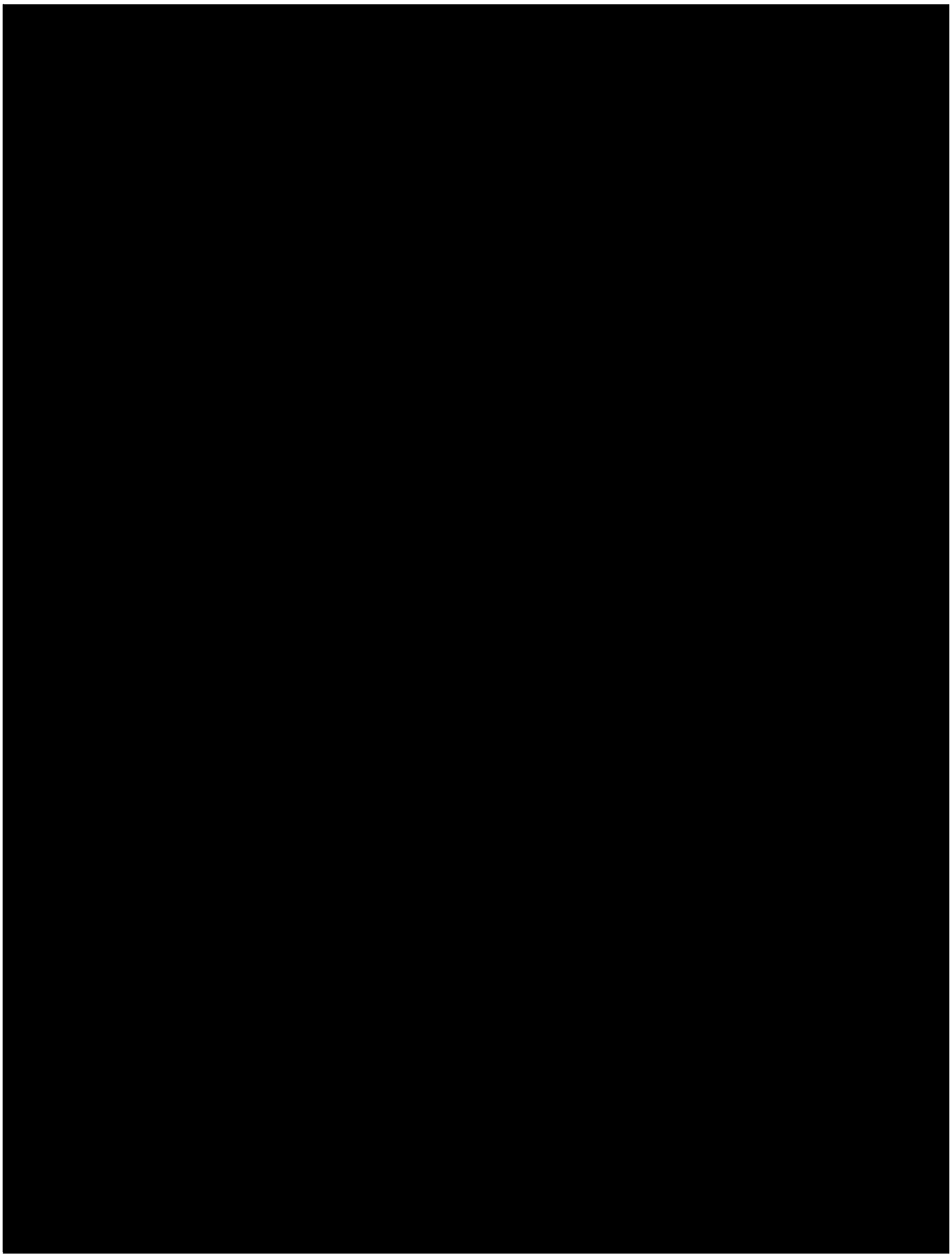
[redacted]

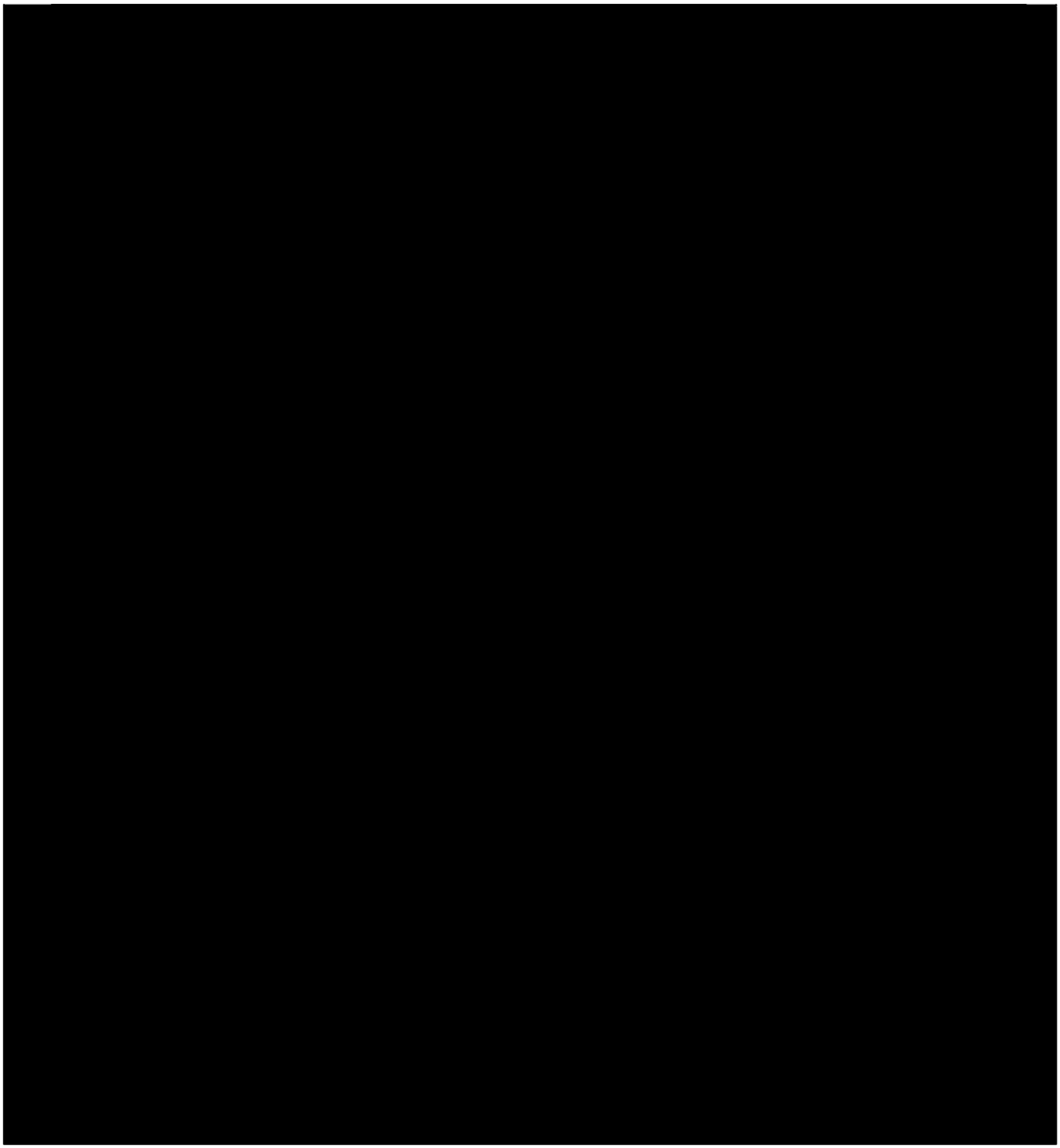
REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero, and NovaSource	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, and NovaSource	Added critical equipment to Att. 3 and other content that contained placeholders that were needed to meet the initial submittal deadline.









ATTACHMENT 4: HOT WEATHER EQUIPMENT INVENTORY

Date inventory completed	
Completed by (name)	

Item #	Description	Qty. Required	Qty. On Hand	Notes
1.	Tarp(s)/Shade Cover	1		
2.	Battery-powered radio with National Oceanic and Atmospheric Administration (NOAA) weather radio with tone alert	1		
3.	Extension cords	2		
4.	Flashlights and batteries	2		
5.	Verify adequate fuel reserves both for backup generator (if present) and for ATV/Vehicle fuel.	--		
6.	Potable water supply	--		
7.	Hot weather gear that is compatible with PPE (e.g., fire-resistant clothing that breathes, cooling bandanas, sunscreen).	--		
8.	Fully stocked First Aid kits	3		
9.	Verify adequate inventory of spare parts on-site or have been ordered for reliable operation of the facility during summer season	--		
10.	Sandbags, Tie-downs and other similar equipment as required			
11.				
12.				
13.				

ATTACHMENT 5: PRE-SUMMER CHECKLIST

Date performed	
Completed by (name)	

	Pre-Summer Checks **Instructions**: Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.
☐	Complete the *Hot Weather Equipment Inventory* and submit to Site Manager and Compliance Manager.
☐	Review the *Hurricane Annex* and update.
☐	Conduct annual hot weather readiness training to review EOP and hot weather events from summer season with relevant operating personnel. Utilize and follow the annex(es) during the training and drill. Collect Field Services feedback on EOP (if any) and, without unnecessary delay, provide Compliance Manager.
☐	Review work orders for weed abatement and/or other hot weather preparedness preventative work to confirm they are scheduled for completion, as needed, prior to the onset of the summer season.
☐	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme heat or hurricane event, including but not limited to scheduling and performing hot weather-related maintenance prior to the beginning of summer and increasing surveillance during extreme hot weather events by scheduling tasks in the work management system.
☐	Notify the Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete summer weatherization.
☐	
☐	

ATTACHMENT 6: PRE-EVENT CHECKLIST

Date performed	
Completed by (name)	

Pre-Event Checklist **Instructions:** Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Monitor weather and weather alerts. Note in shift logs when a hot weather advisory has been issued, and subsequently recalled or released.
☐	For forecasted hurricane and tropical storm events, refer to the *Hurricane Annex*.
☐	Place severe weather protections in service where extreme hot weather could adversely impact Personnel, operations, or forced outage recovery (can include severe thunderstorms or monsoonal flooding).
☐	Establish communications with to NSCR on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
☐	Verify appropriate hot weather PPE for field personnel.
☐	Review staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
☐	Monitor temperatures and take actions to limit or prevent impact impacts to instrumentation and equipment due to extreme heat.
☐	Site Manager to schedule and conduct meeting with field personnel to discuss the weather forecast and to keep all personnel alerted to possible weather conditions.
☐	
☐	

ATTACHMENT 7: EXTREME HOT WEATHER CHECKLIST

Date performed	
Completed by (name)	

ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES IMMEDIATELY FOR ASSESSMENT

Extreme Hot Weather Checklist **Instructions:** Answer each item and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed			
Item #	**Item**	**Complete? Yes, No, or N/A**	**Notes** Include any follow-up activity required.
1.	Review outstanding preventative work orders and perform necessary and immediate work needed to protect the facility (e.g. weed abatement, fire prevention activities, flood preparation).		
2.	Establish staff responsibilities to monitor weather and weather alerts.		
3.	Establish communications with the Personnel, including notification to NSCR of potential facility outage, shutdown, or curtailment.		
4.	Check that all critical equipment is operating and protected per the manufacturer's recommendations during extreme hot weather events. Emphasize the points at the facility where weed abatement and fire safety are necessary to protect critical equipment.		
5.	Refer to **Critical Equipment Matrix** (Attachment 3) and plan preventative and response actions based on forecasted conditions, which should include notifications to Personnel.		
6.	Monitor and address any bird or animal nesting in or around the high voltage substation.		
7.	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements checking insulation thickness, quality, and proper installation, building entrances, windows, etc.).		
8.	Check equipment inventory and replenish all quantities. Refer to **Hot Weather Equipment Inventory** attachment. Be sure to check all First Aid kits and confirm PPE "in use" dates.		
9.			
10.			

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Madero, which consists of Madero Grid LLC and Ignacio Grid LLC, specific to the preparation for hurricane and tropical storm events, and post storm return to normal operations (as required) response. This annex shall be used in conjunction with the *Hot Weather Annex* and the *Cold Weather Annex*.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Madero Compliance Manager.

A. Roles and Responsibilities

1.2 Madero Compliance Manager

1.2.1 Role – The Madero compliance manager and owner of the EOP.

1.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Madero's business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Reviews and approves the EOP annually.
- Maintains evidence.

1.3 NovaSource Power Services (NSPS) Site Manager

1.3.1 Role – the manager of the team contracted to perform the O&M services at the Madero Facility.

1.3.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-hurricane and tropical storm season review activities have been complete.
- Oversee the day-to-day operations of the Madero facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hurricane preparation needs or deficiencies.
- Notify the Compliance Manager of hurricane preparation tasks progress, scheduling, or concerns with meeting deadlines
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Madero upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Madero upon completion and by the end of each calendar year.
- Provide evidence to Madero Compliance Manager upon completion and request.

1.4 NSPS Field Services

1.4.1 Role – Contracted to perform the O&M services at the Madero Facility.

1.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Site Manager and Compliance Manager.
- Coordinate with and report facility weather-related information to Site Manager and NovaSource Control Room (NSCR) Operating Personnel.
- Identify potential risk areas due to hurricane conditions and report opportunities to improve readiness and response to the Site Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.

- Participate in post-hurricane evaluations to assess the effectiveness of this annex and provide feedback.

1.5 NSCR Operating Personnel

1.5.1 Role – The registered Generator Operator (GOP) for the Madero facility.

1.5.2 Responsibilities include:

- Operates the Madero site from the NSCR operations center in Chandler, Arizona.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Madero outage, shutdown, or curtailment
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Madero upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

Figure from: Hidalgo County Hazard Mitigation Plan

Figure 6-1. Location of Historic Storm Tracks

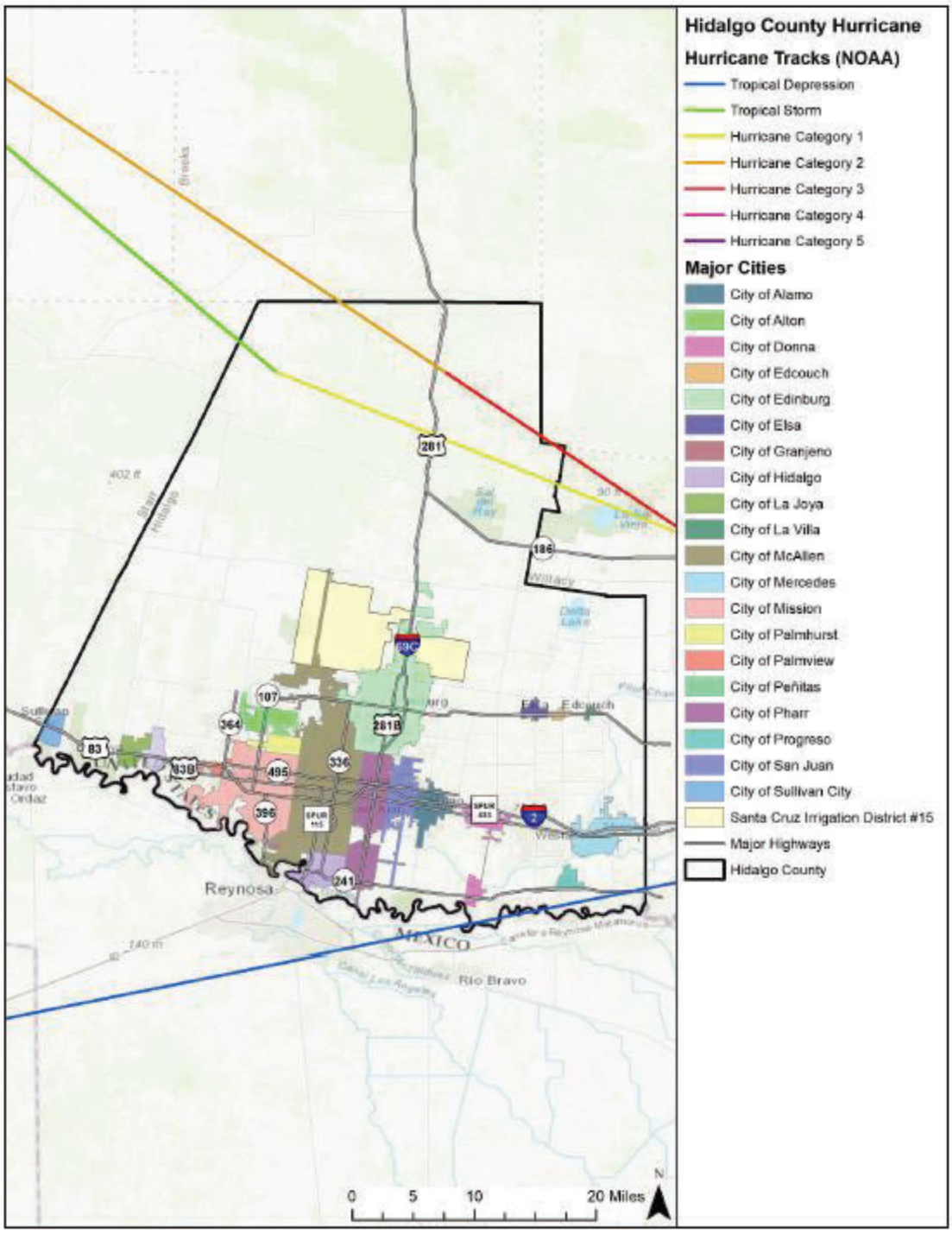
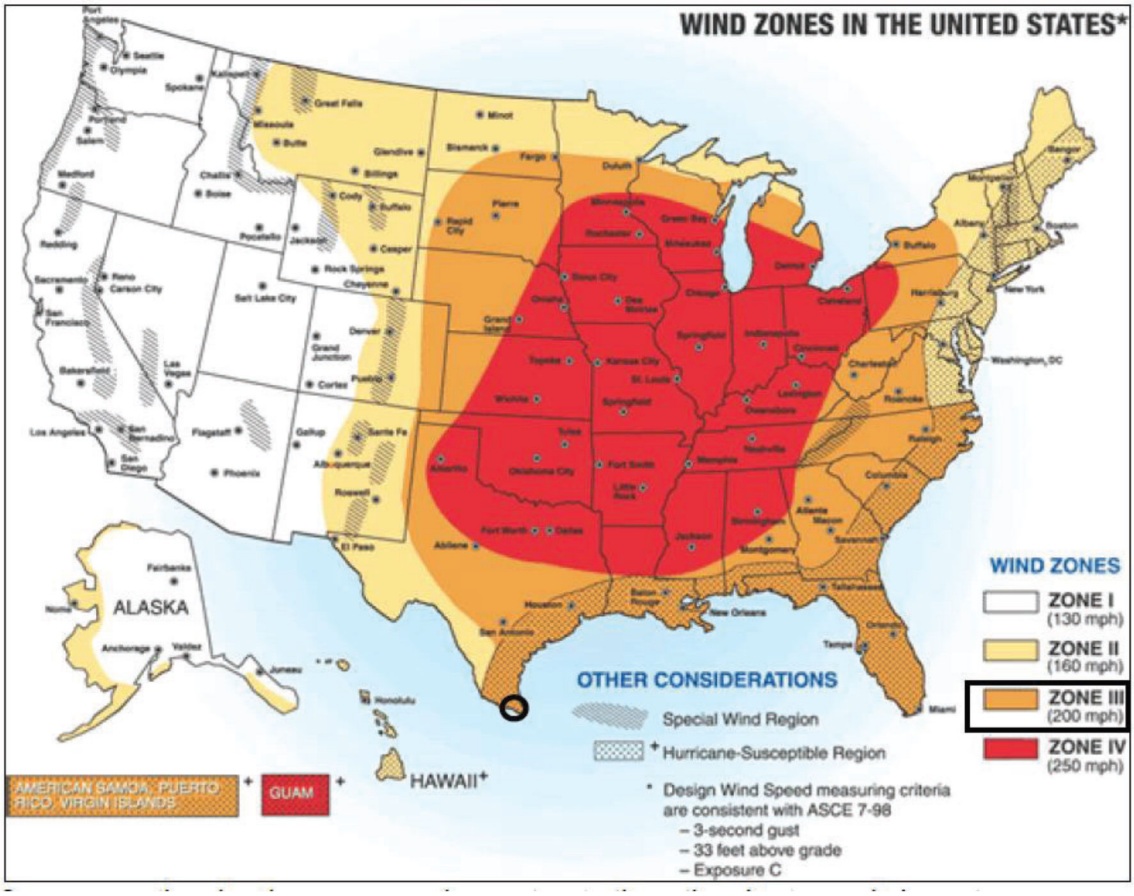


Figure 9-1. Wind Zones in the United States[2]



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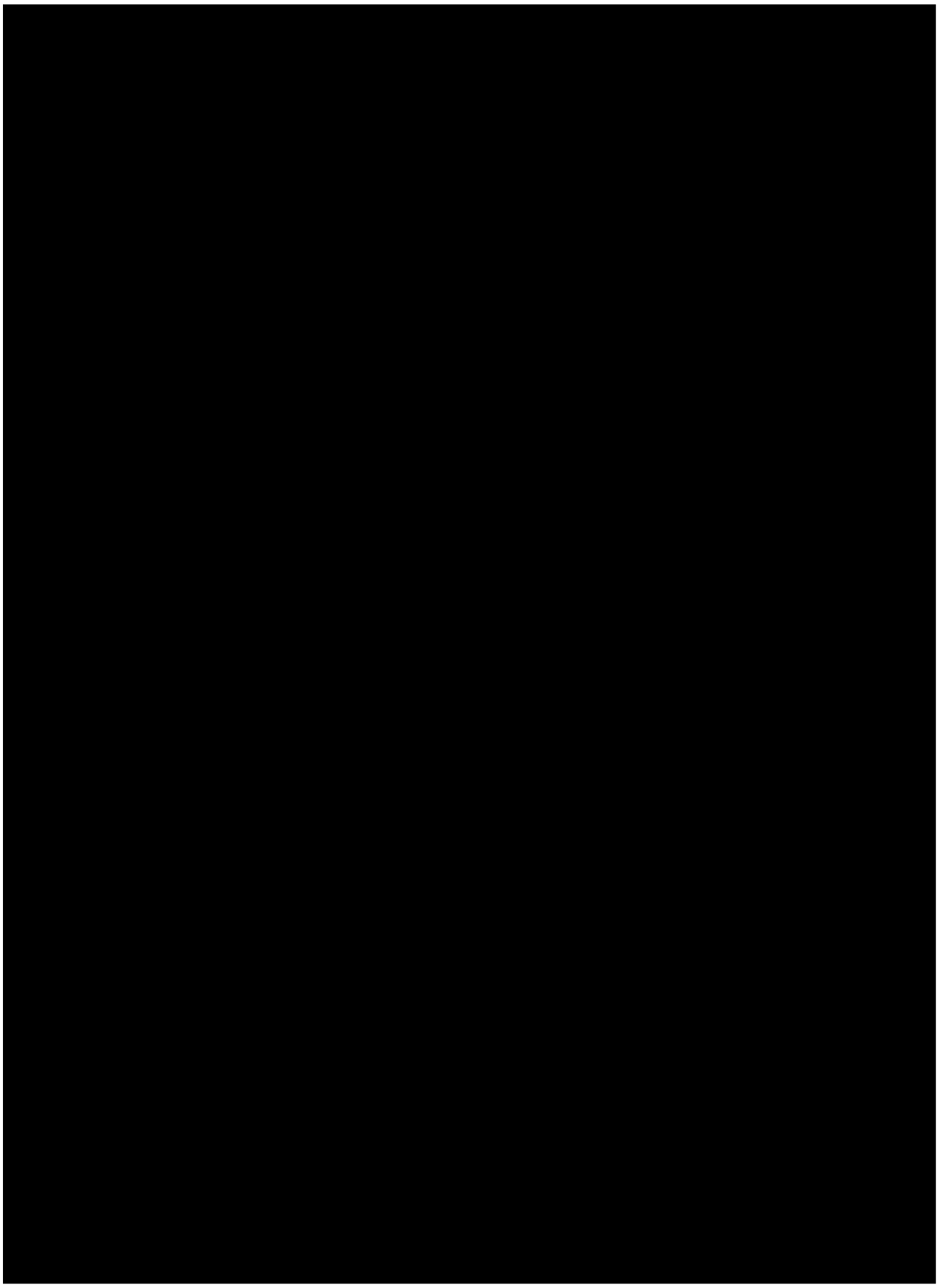

3.0 HURRICANE AND TROPICAL STORM PREPARATIONS AND REVIEW

3.1 Pre-Hurricane Season Checks

The Atlantic Hurricane Season runs from **June 1** to **November 30** of each calendar year, Field Services will utilize the *Hot Weather Annex* to complete all pre-season checks, which includes items related to hurricane preparedness.

3.2 Pre-Event Checklist

Field Services will complete the *Hurricane and Tropical Storm Pre-Event Checklist* upon issuance of any watch by the National Hurricane Center for Tropical Storm or Hurricanes which has the potential to impact the Madero facility.

As part of its preparation, Field Services personnel will utilize its **Critical Equipment Matrix** as found in the *Emergency Operations Plan* to evaluate areas of vulnerability from heavy rain, lightning, flooding and high wind conditions at the facility.

3.3 Post-Event Checklist

Follwing a hurricane or tropical storm, Field Services personnel will complete the *Hurricane and Tropical Storm Post-Event Checklist*.

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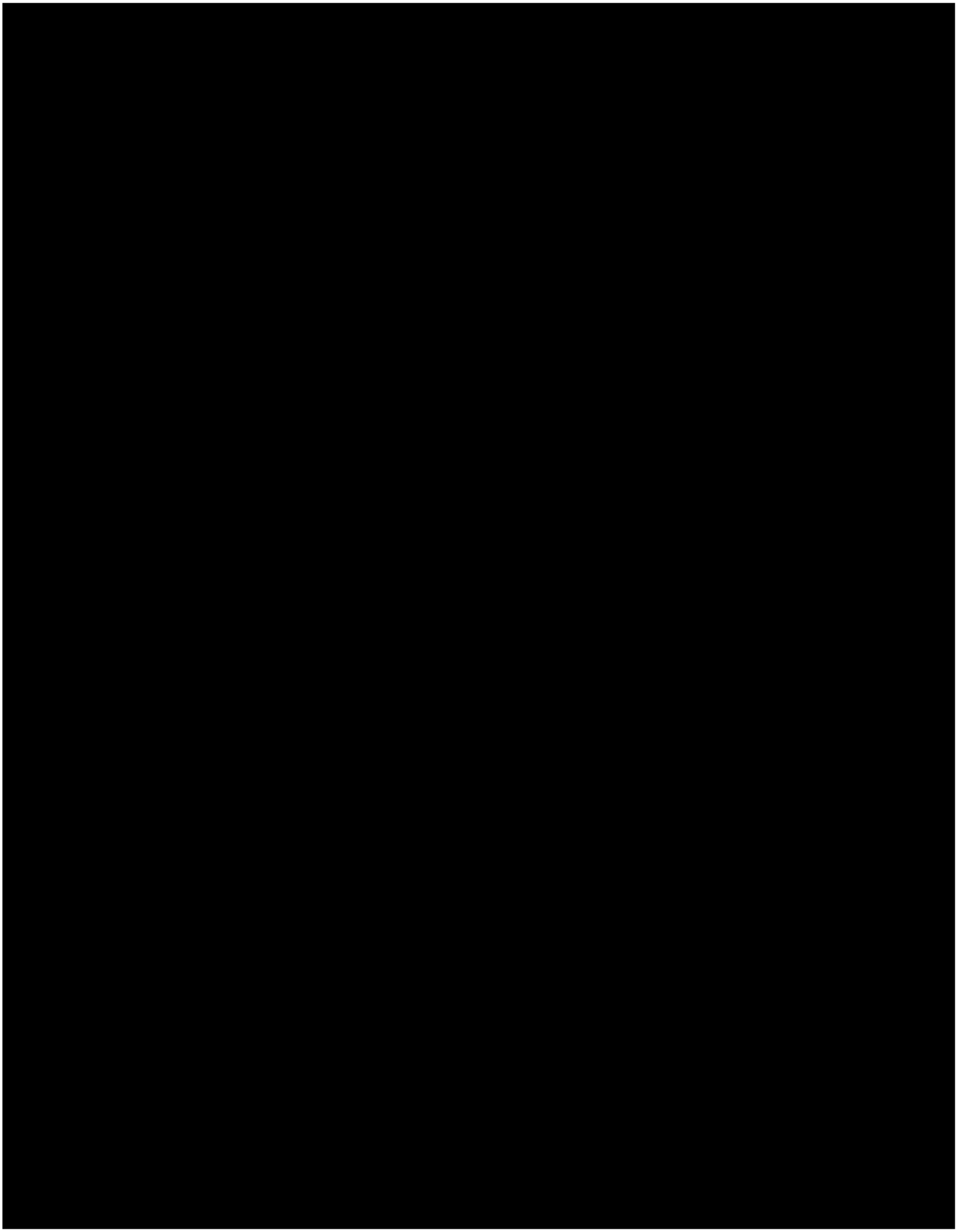

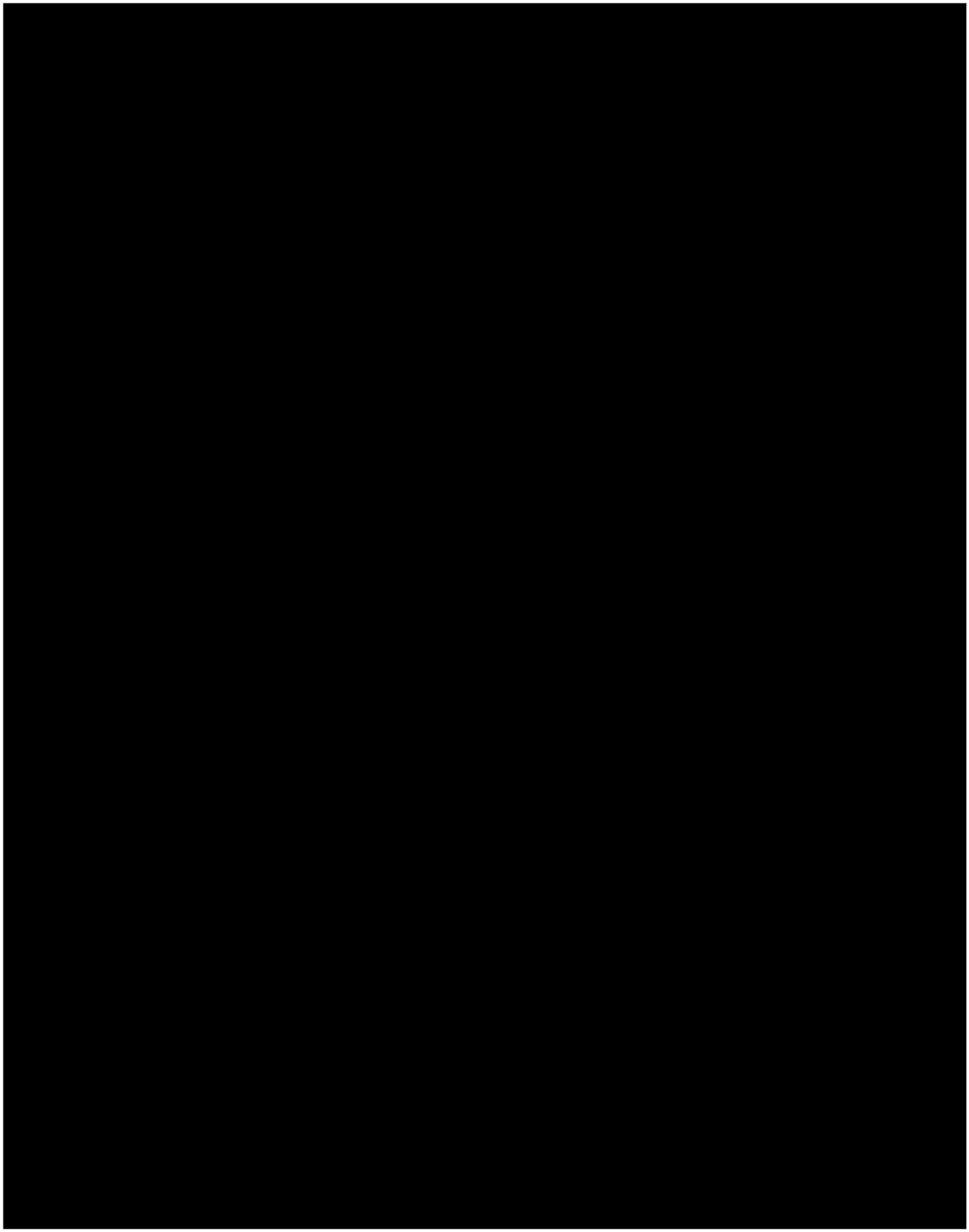

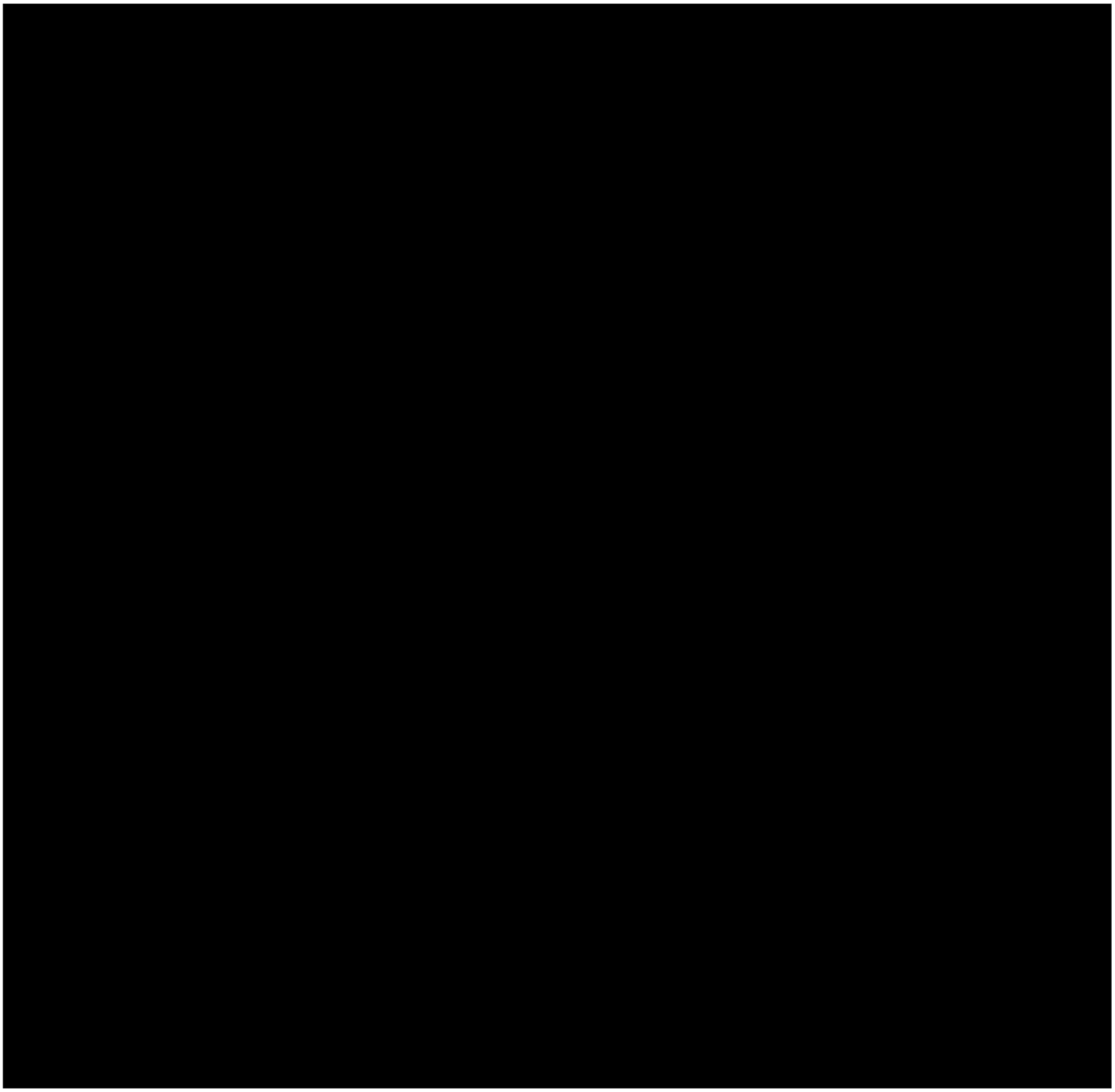

8.0 ANNUAL TRAINING AND REPORTING REQUIREMENT

The PUCT requires that all relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Annual training and review as part of the *Hot Weather Annex* training and review will be conducted on hurricane and tropical storm topics to support readiness for executing and implementing this annex. Review will use this document and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by storm conditions.
- A review of personnel health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Evacuation planning.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended severe weather outlook if available.

At the end of each calendar year, the Site Manager will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and

2. Dates of access to or training on the EOP, as appropriate.

9.0 RESOURCES AND RELATED DOCUMENTS

Madero Emergency Operations Plan

Madero Cold Weather Annex

Madero Hot Weather Annex

Madero Cyber and Physical Security Incident Annex

Madero Pandemic and Epidemic Annex

Hidalgo County Emergency Management:

https://www.hidalgocounty.us/85/Emergency-Management

Texas Department of Emergency Management (TDEM) – Region 3:
https://www.tdem.texas.gov/regions/region-3

ERCOT

Current Protocols - Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

10.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

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REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	4/15/2022	GridSME, Madero and NovaSource	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, and NovaSource	Document review and minor edits to include Ignacio Grid LLC.

ATTACHMENT 1: HURRICANE AND TROPICAL STORM PRE-EVENT CHECKLIST

Date performed	
Completed by (name)	

Pre-Event Checks **Instructions**: Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Monitor weather and weather alerts. Note in facility logs when Hurricane or Tropical Storm watch has been issued, and subsequently recalled or released.
☐	Notify Operating Personnel of storm notification and relevant information.
☐	Review evacuation routes regardless of evacuation probability.
☐	Place severe weather protections in service where weather could adversely impact personnel, operations, or forced outage recovery (including severe thunderstorms, damaging winds or flooding).
☐	Verify all facility drainage infrastructure is intact and free of obstructions.
☐	Verify all access gates closed and with intact working locks.
☐	Check all facility building and cabinet doors (transformer, circuit breakers, mega-packs, etc.) shut and locked if applicable.
☐	Check site for loose or unsecured equipment including spare parts, tools, rubbish bins, temporarily stored items.
☐	Verify all phone, radio and other communication systems operational with batteries fully charged.
☐	
☐	
☐	
☐	

ATTACHMENT 2: HURRICANE AND TROPICAL STORM POST-EVENT CHECKLIST

Date performed	
Completed by (name)	

Hurricane and Tropical Storm Post-Event Review Checklist **Instructions:** Check each item when complete and provide completed checklist to Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Communicate with GOP Operating Personnel on status of facility (energized/de-energized, alarms, etc.) and status of Interconnection Substation (energized/deenergized, hot line from Madero to POI, etc.)
☐	Verify outer perimeter safe to enter through visual inspection.
☐	Note any hazardous situations that need immediate remediation within the outer perimeter, place warning signs/tape as necessary to alert others to hazard.
☐	Note any missing/damaged security fencing for the outer perimeter, secure if possible.
☐	Verify Madero Facility safe to enter through visual inspection.
☐	Verify the Energize/De-energize status of all Madero Facility equipment. Establish electrical clearances as appropriate for the situation.
☐	Note any hazardous situations that need immediate remediation within the inner perimeter, place warning signs/tape as necessary to alert others to hazard.
☐	Visually verify the integrity of all equipment. Note any items needing immediate attention (cabinet damage, damaged closures, etc.)
☐	Visually verify the integrity of all medium and high voltage substation equipment.
☐	Document all discrepancies noted and create work orders as necessary to address damage to the facility.
☐	Identify any lessons learned or procedural improvements to include in this annex, including any updates to this readiness timeline or extreme heat or severe summer weather preparedness checklist.

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Madero, which consists of Madero Grid LLC and Ignacio Grid LLC, specific to pandemic and epidemic planning to address continuity and maintain essential functions and services during those events.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Madero Compliance Manager.

B. Roles and Responsibilities

1.2 Madero Compliance Manager

1.2.1 Role – The Madero compliance manager and owner of the EOP.

1.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised Plan, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Madero's business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Maintains evidence.

1.3 NovaSource Site Manager

1.3.1 Role – the manager of the team contracted to perform the O&M services at the Madero Facility.

1.3.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Oversee the day-to-day operation of the Madero facility.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Madero upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Madero upon completion and by the end of each calendar year.
- Provide evidence to Madero Compliance Manager upon completion and request.

1.4 NovaSource Field Services

1.4.1 Role – Contracted to perform the O&M services at the Madero Facility.

1.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Assist in evaluation and escalation of potential incidents.
- Participate in training, drills, and post-incident reviews.

1.5 NSCR Operating Personnel

1.5.1 Role – The registered Generator Operator (GOP) for the Madero facility.

1.5.2 Responsibilities include:

- Operates the Madero site from the NSCR operations center in Chandler, Arizona.
- Assist in evaluation and escalation of potential incidents.
- Participate in training, drills, and post-incident reviews.

2.0 PANDEMIC THREAT LEVELS

The World Health Organization (WHO) defines a pandemic as a "worldwide spread of a new disease" where "the impact or severity tends to be higher…in part because of the much larger number of people…who lack pre-existing immunity to a new virus." Examples of recent pandemic events include the H1N1 pandemic in 2009-2010, the Zika virus pandemic in 2016, and the COVID-19-Coronavirus pandemic starting in 2019.

The pandemic threat levels are based on the WHO and US National Alert Stages and have been modified to fit Madero. The pandemic threat levels are based on the level of person-to-person transmission and how widespread the disease is in humans, as measured in the US transmittal rates. Planning and response measures are based on the pandemic threat level. Madero will consult with WHO, the Center for Disease Control (CDC), and the local and state health departments. Attachment 1 contains the Federal Government Response Stages matrix.

Level 0 – Awareness	No documented cases of person-to-person transmission.
Level 1 – Cautionary	Documented person-to-person transmission is rare.
Level 2 – Serious	Limited documented person-to-person transmission (Small Cluster).
Level 3 – Severe	Evidence of widespread person-to-person spread (larger or multiple clusters identified in the US) **AND** Limited person-to-person spread within city.
Level 4 – Critical	Increasing and sustained person-to-person transmission **AND** Multiple clusters of cases identified in two (2) or more countries or regions.

3.0 CRISIS TEAM

To facilitate Madero's response to a pandemic, Madero will establish a cross-functional crisis team comprised of representatives of Human Resources, Corporate Communications, Madero, NovaSource Operations and Maintenance personnel, and others, as needed. The Compliance Manager, and Site Manager will jointly lead the team, which is charged with evaluating relevant information, assessing impact to Madero operations, developing appropriate responses to actual and potential developing threat, and communicating per established periodicities with staff.

4.0 PANDEMIC DISEASE CONTAINMENT/CONTROL STRATEGIES

Government and health departments will publish the actions they are taking to implement disease containment strategies. Madero will use this published information and factor the potential impacts on both business and Bulk Power System operations. Madero may choose to implement any number of containment strategies and to recommend these strategies to their personnel, as appropriate. Strategies may include the following:

- **Isolation** - Separation of persons with specific infectious illnesses in their homes, in hospitals, or in designated healthcare facilities.
- **Quarantine** - Separation and restriction of the movement of people, who while not yet ill, have potentially been exposed to an infectious agent.
- **Social Distancing** - Social distancing measures could take the form of: modifying the frequency and type of face-to-face employee encounters (e.g., placing moratoriums on hand-shaking, substituting teleconferences for face-to-face meetings, staggering breaks, posting infection control guidelines); establishing flexible work hours or worksite; and

implementing strategies that request and enable employees to stay home at the first sign of symptoms.

The use of these strategies, along with enhanced hygiene etiquette and the cancellation of non-essential activities to reduce the potential for transmission rates, will be evaluated for use throughout the duration of the pandemic event.

6.0 PLANNING ASSUMPTIONS

Listed below are the overarching organizational planning assumptions.

- Federal, State, and Local government will provide guidance and/or direction regarding current pandemic status.
- Madero will evaluate all available information published during a pandemic to determine appropriate response and actions.
- The Madero facility will be accessible, but right of entry may be limited to essential personnel.

- Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.
- Travel restrictions, such as limitations on mass transit, implemented at the Federal, State, tribal, territorial, and local levels may affect the ability of some staff to report to work.
- Additional funding may be required for the acquisition of additional equipment, whether Personal Protective Equipment (PPE) or other equipment identified during an event (e.g. face mask, cleaning supplies and test kits as applicable).

7.0 RESOURCES AND RELATED DOCUMENTS

Madero Emergency Operations Plan

Madero Cold Weather Annex

Madero Cyber and Physical Security Incident Annex

Madero Hot Weather Annex

Madero Hurricane Annex

Centers for Disease Control

Pandemic resources webpage: https://www.cdc.gov/flu/pandemic-resources/index.htm

National Strategy Planning webpage:

https://www.cdc.gov/flu/pandemic-resources/planning-preparedness/national-strategy-planning.html

NERC COVID-19 webpage: https://www.nerc.com/news/Pages/COVID-19.aspx

World Health Organization

https://www.who.int/emergencies/diseases/en/

Health and Human Services

- **Pandemic Influenza Preparedness Response and Recovery Guide for Critical Infrastructure and Key Resources**

https://asprtracie.hhs.gov/technical-resources/resource/1978/pandemic-influenza-preparedness-response-and-recovery-guide-for-critical-infrastructure-and-key-resources

Texas Health and Human Services – Health Alerts & Advisories webpage:
https://dshs.texas.gov/news/alerts.aspx

Hidalgo County Public Health Department: https://www.hidalgocounty.us/

8.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

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REVISION CONTROL SUMMARY

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1.0	4/15/2022	GridSME, Madero, NovaSource (O&M) and NSCR (GOP)	New document created for 4/18/22 deadline to submit.
1.1	12/1/2022	GridSME, Madero, NovaSource (O&M) and NSCR (GOP)	Review and minor edits.

ATTACHMENT 1: WHO PHASES AND GOVERNMENT RESPONSE STAGES

Taken from *Pandemic Influenza: Preparedness, Response, and Recovery; Guide for Critical Infrastructure and Key Resources* (*https://www.dhs.gov/sites/default/files/publications/cikrpandemicinfluenzaguide.pdf*)

WHO Phases		Federal Government Response Stages	
INTER-PANDEMIC PERIOD			
1	No new influenza virus subtypes have been detected in humans. An influenza virus subtype that has caused a human infection may be present in animals. If present in animals, the risk of human disease is considered to be low.	0	New domestic animal outbreak in at-risk country
2	No new influenza virus subtypes have been detected in humans. However, a circulating animal influenza subtype poses a substantial risk of human disease.		
PANDEMIC ALERT PERIOD			
3	Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.	0	New domestic animal outbreak in at-risk country
		1	Suspected human outbreak overseas
4	Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.	2	Confirmed human outbreak overseas
5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).		
PANDEMIC PERIOD			
6	Pandemic phase: increased and sustained transmission in general population.	3	Widespread human outbreaks in multiple locations overseas
		4	First human case in North America
		5	Spread throughout United States
		6	Recovery and preparation for subsequent waves

ATTACHMENT 2: PANDEMIC PLANNING CHECKLIST

Instructions: Use this checklist to start the planning and response processes. Add items, as needed.

Evaluate	
Check when complete	**Item**
	Identify and gather members of the Pandemic Crisis Team
	Collect information on the status of pandemic from trusted and verified sources.
	Evaluate the need to obtain and distribute additional Personal Protective Equipment (PPE)
	Determine potential impacts to staffing and operations of the site

Communicate	
Check when complete	**Item**
	Provide guidance to personnel on personal contact policy and protective measures
	Communicate staffing changes for pre-determined period to prevent spread, contain infection, etc.
	Establish a set schedule for communications