

Filing Receipt

Received - 2023-03-14 11:55:59 PM Control Number - 53385 ItemNumber - 1152

PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY§BEFORE THEOPERATIONS PLANS AND RELATED§PUBLIC UTILITY COMMISSIONDOCUMENTS UNDER 16 TAC § 25.53§OF TEXAS

2023 JOINT EMERGENCY OPERATIONS PLAN AND EXECUTIVE SUMMARY OF ELECTRANET POWER, LLC, EROCK ON-SITE, LLC, POWER DEPOT – TEXAS GROUP A, LLC, GENERATE ER-NG, LLC, AND TEXAS MICROGRID, LLC

In compliance with the 16 Tex. Admin. Code ("TAC") § 25.53 issued in the Commission's *Order Adopting New16 TAC § 25.53 As Approved At The February 25, 2022 Open Meeting* ("Order"), Electranet Power, LLC ("Electranet – REP"), ERock On-Site, LLC ("ERock On-Site – REP"), Power Depot – Texas Group A, LLC ("PDA – PGC"), Generate ER-NG, LLC ("Generate – PGC"), and Texas Microgrid, LLC ("TMG – PGC"), collectively "Applicable Entities," revised their emergency operations plan ("EOP"), effective March 15, 2023. As required by 16 TAC § 25.53(c)(1)(A)(ii), a redacted copy of the revised EOP with all confidential information removed is attached as Exhibit A. The record of distribution required under 16 TAC § 25.53(c)(4)(A) is attached as Exhibit B. The affidavit required under 16 TAC § 25.53(c)(4)(C) is attached as Exhibit C. Affidavits from PDA – PGC, Generate – PGC, and TMG - PGC delegating EOP responsibility were filed with our initial EOP in 2022.

Contemporaneously with this filing, Applicable Entities are submitting the revised unredacted EOP to ERCOT as required by 16 TAC § 25.53(c)(1)(B).

Respectfully submitted,

By: /s/ Joel Yu

Joel Yu Vice President, Policy Enchanted Rock, LLC 1113 Vine St, Suite 101 Houston, TX 77002 jyu@enchantedrock.com

PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY	§	BEFORE THE
OPERATIONS PLANS AND RELATED	§	PUBLIC UTILITY COMMISSION
DOCUMENTS UNDER 16 TAC § 25.53	§	OF TEXAS

EXECUTIVE SUMMARY

Applicable Entities' EOP documents planning efforts to ensure continuity of resilience microgrid operations through a variety of emergencies.

The table below provides an overview of the contents of the EOP indexed against the specific requirements of 16 TAC § 25.53 as applicable for each entity. Requirement 16 TAC § 25.53(e)(2)(B) is not included in the table and not applicable to the PGC entities as they do not utilize water in the generation of electricity.

EOP Section Title and Description of Changes	Page Number	Applicable Entities	Corresponding Requirement
Approval and Implementation - No material changes	5	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(d)(1)
Communication Plan - No material changes	6	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(d)(2); 16 TAC § 25.53(c)(4)(B)
Emergency Supply Chain Plan - No material changes	7	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(d)(3)
Emergency Staffing Plan - No material changes	8	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(d)(4)

Backup Control Plan - No material changes	9	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(d)(5)
Disaster Management Plan - Edits concerned authority to require employees to stay away from affected facilities, notifications to vendors, adding telephone numbers, clarifying wording for emergency announcements, roles and responsibilities of NOC, and more detailed instructions on preparing for tornados.	12	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(A); 16 TAC § 25.53(e)(2)(E); 16 TAC § 25.53(e)(2)(G); 16 TAC § 25.53(e)(3)(B); 16 TAC § 25.53(e)(3)(D)
Restoration of Service - No material changes	26	PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(C)
Pandemic Preparedness Measures for the Network Operations Center - No material changes	27	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(D); 16 TAC § 25.53(e)(3)(A)
Pandemic Preparedness Measures for Field Operations & Maintenance - No material changes	28	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(D); 16 TAC § 25.53(e)(3)(A);
Cybersecurity Charter - Changes to office responsible for the development, maintenance, and governance of Digital Security Framework	29	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(F); 16 TAC § 25.53(e)(3)(C)
Cybersecurity Incident Response Plan - Organizational updates	38	Electranet – REP; ERock On-Site – REP; PDA – PGC; Generate – PGC; TMG - PGC	16 TAC § 25.53(e)(2)(F); 16 TAC § 25.53(e)(3)(C)
Emergency Action Plan - Tornados	48	Electranet – REP; ERock On-Site – REP; PDA –	16 TAC § 25.53(d)(5)

- No material changes	PGC; Generate – PGC;	
	TMG - PGC	

With respect to 16 TAC § 25.53(f), the Applicable Entities conducted its annual drill on December 19, 2022, and submitted prior notifications to commission staff and the appropriate TDEM District Coordinators as required.



EXHIBIT A: Enchanted Rock Emergency Operations Plan (EOP)

Version 2.0 – Approved March 15, 2023



Confidentiality Statement

This material is proprietary and confidential, may be legally privileged, and is intended solely for the use of the approved individual(s) or entity to which they are distributed. This is an unpublished work containing information which is not for publication. The information contained here is not generally known to competitors of Enchanted Rock. Please be aware that any disclosure, reproduction, copying, distribution or use of the contents in whole or part by any means whatsoever is prohibited without written permission of Enchanted Rock. The information contained in this document is believed to be accurate and it is intended for emergency operations planning and training purposes, for internal use only. This information is subject to change without notice.

Introduction

The EOP is drafted to apply generally to Enchanted Rock's operations except where specific applicability to certain facilities or entities is noted.

Table of Contents

1.	Approval and Implementation5
2.	Communication Plan6
3.	Emergency Supply Chain Plan7
4.	Emergency Staffing Plan8
5.	Backup Control Plan9
Арр	endix A – Critical Personnel Contact Info10
Арр	endix B – Network Operations Center11
Disa	aster Management Plan – DMP-00
1 IN	ITRODUCTION
1	.1 Purpose
1	.2 General Assumptions
2. G	ENERAL EMERGENCIES
2	.1 Introduction
2	.2 Procedure for General Emergencies15
3 CI	OSING THE FACILITY
3	.1 Policy
3	.2. Procedure
3	.3 Closing the Facility under extreme circumstances16
3	.4 Re-opening the Facility after an event requiring evacuation



4 E/	ARTHQUAKES	17
5 FI	RES	18
6 FL	OODS	19
7 HI	JRRICANES / SEVERE STORMS	19
8 W	INTER STORMS / SEVERE WEATHER	20
9 TC	DRNADOES	21
10 0	CIVIL UNRESTS	22
1	0.1 Introduction	22
1	0.2 Guidelines	22
11 E	BURGLARY / ROBBERY	22
1	1.1 Burglary	22
	11.1.1 Before the Emergency	22
	11.1.2 After the Emergency	22
1	1.2 Robbery	23
	11.2.1 Before the robbery	23
	11.2.2 After a robbery	23
12 E	30MB THREATS / THREATENING PHONE CALLS	24
1	2.1 Preparing for a bomb threat	24
1	2.2 During a threatening Call	24
13 E	DISASTER MANAGEMENT ROLES & RESPONSIBILITIES	25
1	3.1 Introduction	25
1	3.2 Roles & Responsibilities	25
1	3.3 Resources	26
	13.4 Contacts and Phone Numbers	26
6.	Restoration of Service	26
7.	Pandemic Preparedness Measures for the Network Operations Center	27
8.	Pandemic Preparedness Measures for Field Operations & Maintenance	28
Cyb	ersecurity Charter – DS-GP00	29
Exe	cutive Summary	30
Intr	oduction	31
Pur	pose and Objectives	31



Purpose	
Objectives	31
Scope and Authority	32
Scope of Application	32
Authority	32
Golden Rules	32
#1 Digital security is every employee's concern and responsibility	
#2 Access to information and digital resources is based on an explicit, personal, non-tra time-bound authorization	
#3 Digital security is an integral component of our business activities	
#4 Every critical digital asset must have a dedicated business owner and be adequately	protected 33
#5 Roles and accountabilities are clearly established	34
#6 There is an established process for monitoring, detecting, and treating threats, vulne incidents	
#7 Digital security is a continuous improvement process	35
Implementation	35
Digital Security Framework	35
Digital Security Program	36
Governance	37
Control and Audit	37
Cybersecurity Incident Response Plan – DS-GP04	
1. Purpose and Objectives	
2. Digital Security Incidents	
2.1. Incident characterization	
2.2 Severity Qualification	41
3. Incident Management Process	
4. Golden Rules	
4.1. Incident detection and signaling	
4.2. Qualification and treatment	
4.3. Capitalization	
4.4. KPIs and reporting	
5. Roles and Responsibilities	45



6. Key indicators	46
Appendix A. – Incident Reporting Contact	47
Appendix B: Enchanted Rock Emergency Action Plan – Tornados	48

1. Approval and Implementation

Introduction

The purpose of this EOP is to document Enchanted Rock's preparations for and response to emergency events. The EOP includes procedures and guidelines for operational response to be activated and followed before, during, and after such identifiable events. Responsible individuals and groups have been outlined in the relevant sections.

Individuals Responsible for EOP

EOP Maintenance/Change Control	Position	Email
Peter DiSanto	President, Operations	pdisanto@enchantedrock.com
Adam Rohan	VP, Business & Market Operations	arohan@enchantedrock.com
Joel Yu	Vice President, Policy	jyu@enchantedrock.com
EOP Implementation	Position	Email
Paul Andrews	Director, Operations & Maintenance	pandrews@enchantedrock.com
Charles Kinnison	Manager, Control Center Operations	ckinnison@enchantedrock.com
Steven Holtzclaw	SVP, Shared Services	sholtzclaw@enchantedrock.com

Revision Control Summary

This is the first version of this document, created and expanded from the EOP submitted to ERCOT over the past several years. ISO 9001 standards will be implemented to track version control going forward. Updates will be filed with the relevant regulatory authorities and entities as required by applicable regulations.

This document supersedes any previous versions submitted to ERCOT and the PUCT.



Revision	Issue date	Prepared by	Changes
1.0	4/15/2022	Joel Yu	New Document
2.0	March 15, 2023	Joel Yu	Changes and Updates

2. Communication Plan

For any urgent requests or questions from the commission during an emergency under 16 TAC § 25.53(c)(4)(B):

Power Depot – Texas Group A, LLC, Texas Microgrid, LLC and **Generate ER-NG, LLC** will communicate with fuel suppliers as well as supplemental operations centers associated with related customers or emergency response entities through services rendered via contracts with Enchanted Rock Operations (ERO).

Communication with the public, media, the commission, the Office of Public Utility Counsel (OPUC), or others will be addressed through the relevant communication channels, as needed.

Electranet Power,

Communication with the public, media, the commission, the Office of Public Utility Counsel (OPUC), or others will be addressed through the relevant communication channels, as needed.

ERock On-Site, LLC

Communication with the public, media, the commission, the Office of Public Utility Counsel (OPUC), or others will be addressed through the relevant communication channels, as needed.

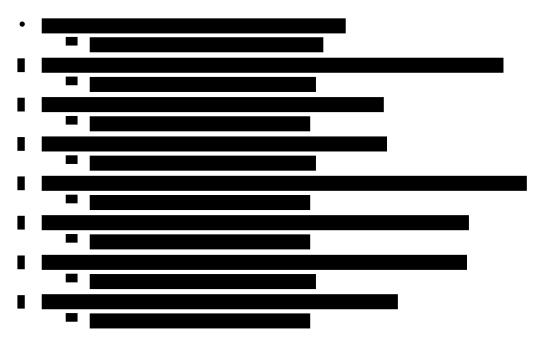


3. Emergency Supply Chain Plan

Enchanted Rock's emergency plan is to maintain a reasonable supply of critical spares and maintenance materials to cover maintenance services during an "event," based on historical experience, to mitigate potential supply chain shortages, shipping delays, travel restrictions and/or vendor shutdowns. Materials will be replenished post-event. Material includes but is not limited to:

- Oil
- Coolant
- Fuel
- Gaskets
- Spark Plugs
- Filters
- Water Intrusion Prevention
- Misc. materials and consumables

Storage facilities are strategically placed in the regions listed below to support the surrounding fleet.





4. Emergency Staffing Plan

This plan (EOP) is to provide guidelines to better plan, prepare, respond, and recover from emergency event triggered by weather and other environmental conditions that may lead to an emergency operation condition. Our EOP internally identifies four unique levels of an event and each level has corresponding actions to take place depending on which level of the event you have entered.

- Level 1 Blue Sky Planning
- Level 2 Pre-Event Prepares
- Level 3 Operating in Event Less than 24 Hours
- Level 4 Post Event

The below guidelines are specific to critical essential employees during an event, regardless of the level, to protect the life safety of employees as well as the integrity and availability of our operating assets in the field that provide power to our end users and ERCOT grid services.

Non-Essential Employees

Non-essential employees are defined as those employees in roles that don't support operations for the company during an emergency or invocation of our Emergency Operations Plan.

After evaluation of the specific emergency event we are faced with, Non-Essential employees will be requested to work remote or in a location that is not impacted by the specific emergency. They will be required to check in periodically to ensure that they are all accounted for on a daily basis until the emergency has been mitigated and we have entered Level 4 - Post event.

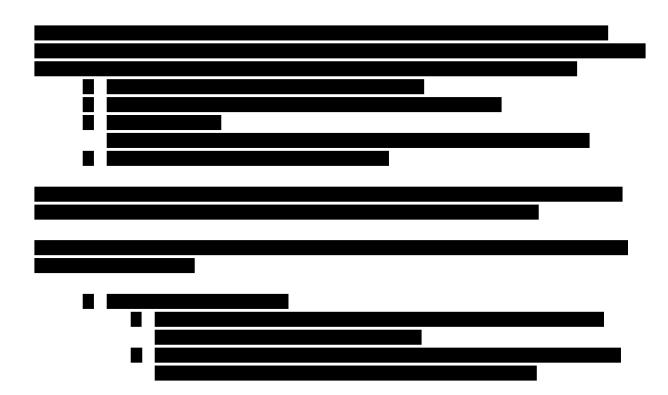
Essential Employees

Essential employees are defined as those employees that support NOC, Network Operations Center, and the field operations team that supports dispatch and repair of assets in the field.

- NOC operators constantly monitor weather conditions as part of their normal duties. In the event of an emergency pertinent weather details are communicated to field service employees and are only dispatched if conditions are safe.
- NOC Manager and Field Operations Management will review and revise scheduled shift times based on weather conditions to ensure staffing is provided at all times in the highest efficiency levels during all times of the day during the emergency event while maintaining safety and business continuity.
- NOC Manager and Field Management will perform and track daily check-ins with dispatched field personnel to maintain readiness and safety of personnel through the duration of the emergency event.



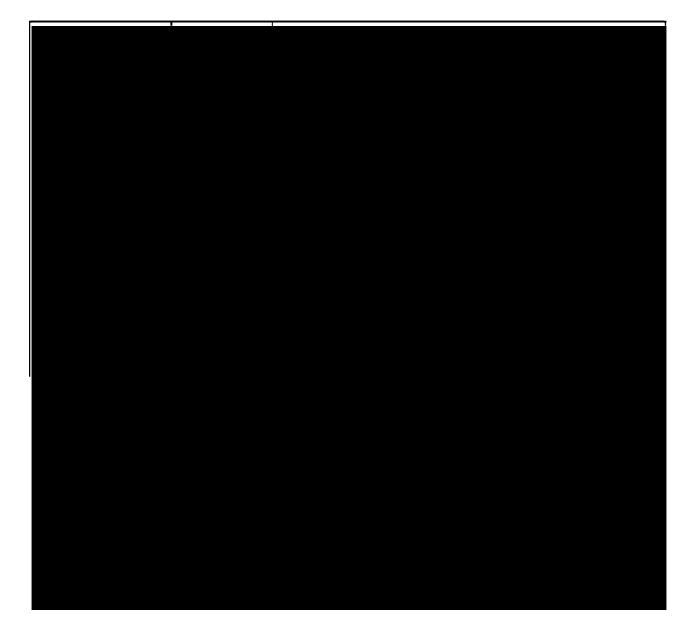
- Field Operations Management will be responsible to ensure that all tasks are assigned/reassigned to ensure all staff are accounted for and priority alarm conditions are being addressed throughout the emergency.
- All NOC and Field Operations staff will be called into duty and all previously requested time off or vacation time will not be approved for during the event
- If labor shortfalls are predicted based on the event and timing of the weather, staff augmentation will be implemented from our qualified vendors in advance of the emergency and dispatched to critical areas needed and identified from our operations management teams to safely maintain field operations during the event.
- Please see Backup Control Plan for more details specific to NOC primary and secondary locations. In the event the NOC is no longer able to operate out of its Primary location we will notify ERCOT and proceed to our backup location. Time to transfer between primary and secondary locations will take no longer than 1 hr. NOC will continue to manage Enchanted Rock resources through its fully redundant and weather hardened operations center at the backup location which has been tested and qualified by ERCOT.



5. Backup Control Plan



Appendix A – Critical Personnel Contact Info





Appe	endix B —		
•			
•			
•			



phone and email with a description of our intended actions. Once again continual contact with ERCOT will be had via the contact list on the next page.

Market Operations Contact List:

Definitions:

"Extended Power Outage" shall have the meaning in Section 13.1395(3) of the Texas Water Code being a power outage lasting for more than 24 hours.

"Hurricane Season" means the period each year from June 1st to November 30th or as defined by the National Weather Service.

"Landfall" means the intersection of the surface center of a tropical storm or hurricane with a coastline, as defined by the National Weather Service.

"National Weather Service" means the United States National Oceanic and Atmospheric

Administration's National Weather Service or its successor agency.

"Storm Event Period" means the period beginning 72 hours prior to the time that the National Weather Service predicts a tropical storm level or higher level storm (i.e., hurricane) will make Landfall on the gulf coast of Texas between or including Jefferson County, Texas and San Patricio County, Texas until the storm warnings by the National Weather Service have been lifted.

Disaster Management Plan – DMP-00

Document Owner

Revision	Issue date	Prepared by	Changes
1.0	3/29/2022	Steven Holtzclaw	New Document



1.1	3/15/2023	Sathya Long	Updates/Edits
-----	-----------	-------------	---------------

Table of Contents
1 INTRODUCTION
1.1 Purpose
1.2 General Assumptions
2. GENERAL EMERGENCIES
2.1 Introduction
2.2 Procedure for General Emergencies15
3 CLOSING THE FACILITY
3.1 Policy
3.2. Procedure
3.3 Closing the Facility under extreme circumstances16
3.4 Re-opening the Facility after an event requiring evacuation17
4 EARTHQUAKES
5 FIRE
6 FLOOD
7 HURRICANE / SEVERE STORMS
8 WINTER STORM / SEVERE WEATHER
9 TORNADO
10 CIVIL UNREST
10.1 Introduction
10.2 Guidelines
11 BURGLARY / ROBBERY
11.1 Burglary
11.1.1 Before the Emergency
11.1.2 After the Emergency
11.2 Robbery
11.2.1 Before the robbery
11.2.2 After a robbery
12 BOMB THREATS / THREATENING PHONE CALLS
12.1 Preparing for a bomb threat
12.2 During a threatening Call



13 DISASTER MANAGEMENT ROLES & RESPONSIBILITIES	5
13.1 Introduction	5
13.2 Roles & Responsibilities	5
13.3 Resources	6

1 INTRODUCTION

1.1 Purpose

The purpose of this Disaster Management Plan is to provide detailed procedures to follow in order to respond to emergency or disaster situations that may impact business functionality for ENCHANTED ROCK and/or its customers.

The procedures within this plan are to be updated by the appropriate internal Teams and revised by the appropriate Executives, as needed.

1.2 General Assumptions

Assumptions are conditions that must exist in order for ENCHANTED ROCK to respond and recover from an incident. The contents of this Disaster Management Plan are based on the following assumptions:

- ENCHANTED ROCK is responsible for the facility business continuity and disaster recovery plans.
- Customers are responsible for all site-level business continuity and disaster recovery plans and their execution in the context of business services being rendered from the ENCHANTED ROCK.
- In the event of a business service interruption or disaster situation, ENCHANTED ROCK will immediately contact and notify customers of the impact. Customers are responsible for maintaining an accurate and up to date list of contacts to ensure communications take place with minimal delays.
- Customers should promptly update ENCHANTED ROCK with any changes in their contact list.
- This document also assumes the existence of the following SOP artifacts:
 - o Facility alarms, surveillance and security SOP
 - Chemical spills/hazardous waste SOP
 - Associate injury claims SOP
 - Customer injury claims SOP
 - ENCHANTED ROCK vehicle accidents SOP



2. GENERAL EMERGENCIES

2.1 Introduction

Emergency guidelines are provided for the care and well-being of ENCHANTED ROCK employees and customers, both during and after a general emergency. In all instances, everything must be done to protect people first, and then assets.

The Director of Operations or Facilities must ensure that all employees are familiar with the guidelines contained in this SOP so they can react appropriately to an emergency. For more information about types of emergencies, refer to the specific section in this SOP.

2.2 Procedure for General Emergencies

During a general emergency, the Director of Operations or Facilities must complete these steps.

- 1- Designate the emergency control center, except in the event of a bomb threat. (for more information, see "Bomb Threats/Threatening Phone Calls" section)
- 2- Contact the Executive Sponsor for notification. (if the facility must be closed, see the "Closing the Facility" section)
- 3- The Executive Sponsor will escalate to the Executive Team
- 4- These are the guidelines for notifying and finding out about facility closing:
 - The Director of Operations is responsible for informing the Executive Sponsor of conditions that may warrant a facility closing.
 - The Executive Sponsor is responsible for informing the Executive Team, who must jointly approve a facility closing.
- 6- Contact employees about scheduling changes through alert notification system or call trees.
- 7- Comply with curfews imposed by city, county, state, provincial, or federal officials.
 - For additional steps and information see "Civil Unrest" section

3 CLOSING THE FACILITY

3.1 Policy

A minimum of two management/supervisory employees must close the Facility.

One member of the closing team must be the Director of Operations, Operations Manager or Executive Staff member.

In case of severe weather, natural disasters, or any other emergencies (such as civil unrest, earthquakes, fire, flood, etc.), ENCHANTED ROCK Facilities may close fully or temporarily. Facilities should follow these guidelines:



- All facilities must close if conditions would potentially expose employees or customers to dangerous weather or other hazardous conditions.
- Facility Management cannot require certain employees to come in or stay when the Executive Team has authorized a delayed opening or the offices, or a Facility closing.

3.2. Procedure

To close the Facility, the Director of Operations or Facilities must complete these steps:

- 1- Stay at the front door of the Facility until all employees and customers have exited.
- 2- Lock the doors / secure access.
- 3- Stay at the front door to allow employees to exit.
- 4- Make sure that:
 - Any exiting employees arrive safely at their vehicles
 - No suspicious vehicle arrives and loiters in the parking area
- 5- Check the following areas to make sure they are clear and/or secure:
 - All exits other than the front door
 - All outside areas including the side entry
 - o Rest rooms
 - $\circ \quad \text{Conference room} \\$
 - \circ Offices
 - Multi-purpose room
 - o Break Room
 - Electrical rooms
 - Storage rooms
- 6- Turn off the power to all unnecessary lighting and equipment.
- 7- Activate the perimeter and interior alarms. Night crew must only activate the perimeter alarm. Signal the closing team member outside to indicate that all is clear and that they are ready to leave the building.
- 8- Unlock the entrance gate, exit the Facility, and lock the doors.
- 9- Leave the premises at once.
- 10- Contact the Executive Sponsor to Ensure the Executive Team is fully informed.
 - The Executive Team will then decide whether or not to declare a full Disaster, thus activating the Disaster Recovery Plans

3.3 Closing the Facility under extreme circumstances

To close the Facility under extreme circumstances, the Director of Operations or Facilities must complete these steps:

- 1. Evacuate the building.
- 2. Secure the perimeter.
- 3. Set perimeter alarms and lock the doors.
- 4. Leave the premises at once.



5.

report the emergency as soon as possible.

- 6. Contact the Executive Sponsor to Ensure the Executive Team is fully informed.
 - The Executive Team will then decide whether or not to declare a full Disaster, thus activating the Disaster Recovery Plans

3.4 Re-opening the Facility after an event requiring evacuation

To re-open the Facility, the Director of Operations or Facilities must complete these steps:

- 1- Contact the Executive Sponsor to Ensure the Executive Team is fully informed.
- 2- Perform visual inspection of area for signs of damage. If damage is identified or suspected, notify appropriate level of management, and do not enter facility until given approval to do so.
- 3- Unlock the entrance gate, and Facility doors.
- 4- Deactivate perimeter and interior alarms.
- 5- Turn power on to lights and required equipment.
- 6- Check the following areas to make sure they are clear and/or secure:
 - o All exits other than the front door
 - All outside areas including the side entry
 - Rest rooms
 - o Conference room
 - o Multi-purpose room
 - Break Room
 - Electrical rooms
- 7- Signal to the opening team member outside to indicate that all is clear and they are ready to enter the building.
- 8- Contact employees to inform them that facilities are open and available for their use.
- 9- Contact the Executive Sponsor to Ensure the Executive Team is fully informed.

4 EARTHQUAKES

To prepare for a potential earthquake the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency
- The emergency announcement is distributed through all appropriate channels
- Emergency evacuation diagrams are posted in appropriate areas. identifying assembly point(s).
- A safe evacuation meeting point is defined and that the evacuation plan is initiated.

During and after an earthquake, the Director of Operations or Facilities must complete these steps:

- 1- Local designate shall distribute the following posted emergency announcement: "Attention, attention, attention. It is now necessary to evacuate the Facility. Please walk to the nearest exit and leave the building."
- 2- Work with local Management to:
 - Evacuate and account for all employees and visitors, if needed

to



- Provide first aid, only on voluntary basis (not a job requirement)
- o Check utilities for leaks and turn off gas and water, if needed
- Protect Facility and exterior inventory
- 3- After customers and employees are taken care of, and the area is stabilized:
 - Secure perimeter of the building and take control of the parking lot
 - Keep sign-in sheets at entrance for employees and contractors/ vendors in case of further damage from aftershocks
 - Assign a point person to coordinate special needs
 - Inventory all damaged equipment and building.
 - Visually identify (and mark) all damaged equipment for further review
- 4- Ensure that all Facility personnel complete their assigned responsibilities. (For more information, see the "Disaster Recovery Responsibilities by Position" section).
- 5- Complete all the applicable steps in the "Procedure for general emergencies" section.

5 FIRES

Before a fire, the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency.
- Annual fire evacuation drill is completed and results documented.
- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in visible areas and are available.
- A safe evacuation assembly point is defined and that the evacuation plan is initiated.

In the event of a fire, local management and all Facility employees are responsible for the safe evacuation of the Facility. To ensure a safe evacuation, complete these steps.

- 1- Determine if the fire is controllable using fire extinguishers.
- 2- Have an employee repeat the following emergency announcement three times: "Attention, attention, attention. It is now necessary to evacuate the Facility. Please walk to the nearest exit and leave the building."
- 3- Call 911 to tell the Fire Department about the emergency. Be prepared to give the Facility address and the nearest cross street.
- 4- Ensure that Management personnel is assigned to:
 - Evacuate all customers and employees
 - Determine the location of the fire
 - Evacuate the restrooms, office areas, break room, multi-purpose room, conference room
 - Account for all employees
- 5- When the Fire Department gets to the Facility, tell first responders
 - The location of the fire
 - The materials involved in the fire
 - The number of persons remaining in the building
- 6- After customers and employees are taken care of, and the area is stabilized, complete all the steps in the "Procedure for general emergencies" section.



6 FLOODS

To prepare for a potential flood, the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency
- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in appropriate areas,
- A safe evacuation assembly point is defined and that the evacuation plan is initiated.

During and after a flood, the Director of Operations or Facilities must complete these steps:

- 1- Secure the building.
- 2- Shut off the electricity, if accessible and necessary.
- 3- If the source of the water is mechanical (such as water flow system, sprinkler system), locate and shut off valves.
- 4- If flooding is external, determine the extent of structural damage and repair with plywood, sand bags, or other materials if safe to do so.
- 5- After customers and employees are taken care of, and the area is stabilized, complete all the applicable steps in the "Procedure for general emergencies" section.

7 HURRICANES / SEVERE STORMS

Hurricanes and some Severe Storms, unlike other emergencies, allow for some preparation in advance of the crisis. Enchanted Rock maintains an awareness of its operating facilities within hurricane evacuation zones, as defined by the Texas Division of Emergency Management (TDEM), and relevant hurricane evacuation routes, as provided by the Texas Department of Transportation (TXDOT)¹.

Once the approximate path has been predicted, the Director of Operations uses a Checklist to help employees prepare for the event. If the storm is predicted to strike the facility, <u>no</u> employee or customer is allowed to stay in an unapproved facility during a crisis of this nature for any reason.

To prepare for a potential hurricane or severe storm, the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency
- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in visible areas and available at the reception desk.
- the evacuation plan is initiated.
- 1. In case of a hurricane or severe storm, the Director of Operations or Facilities must ensure that: The Facility has the updated EOP Hurricane Checklist
- 2. All appropriate employees are designated to complete the items on the checklist.
- 3. Contact the Executive Sponsor for general directions.

¹ Hurricanes (txdot.gov)



- 4. Verify that all management team members are aware of the information in the "General Emergencies" section and understand their roles as it relates to emergency response.
- 5. After customers and employees are taken care of, and the area is stabilized, complete all the applicable steps in the "Procedure for general emergencies" section.

Tasks to be completed by NOC:

- 1. 72 hours prior to Landfall NOC to send Notifications, both phone and email, to Critical Personnel (See Appendix A, Critical Personnel Contact Info)
- 2. 48 hours prior to landfall NOC to mobilize 2 operators to either **Secondary, Tertiary** Back-Up location or Disaster Recovery location (**See Appendix B NOC Procedures**).

8 WINTER STORMS / SEVERE WEATHER

In most circumstances, the 1113 Vine St. #101, Houston, TX 77002 facility will remain open during inclement weather, unless it is required to close due to mandatory evacuations or curfews, or the Company determines there is a safety risk to employees in remaining open.

ENCHANTED ROCK expects employees to use their best judgment and be safety-conscious while traveling from their home or office in any inclement weather. If there is a question about the status of the office or your ability to get to the building, the following guidelines should be followed:

- Should the offices be closed or if there is a need for delayed opening, employees and customers will receive notification through the following communication channels after 6 a.m.:
 - Internal emails (or other notifications) to Facility personnel and onsite customers
 Internal emails (or other notifications) to Facility personnel and onsite customers
- Supervisors and Managers: If an internal communication memo is distributed before work hours, please contact your team members who have not responded to the emergency notification text or cannot be reached via email to inform them of the changes.
 - If the offices are closed during work hours:
 - Employees will receive notification through voicemail, e-mail and text messages.

To prepare for a potential winter storm/severe weather, the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency
- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in the break room, multi-purpose room, reception, conference room, and hallways
- A safe evacuation meeting point is defined and that the evacuation plan is initiated.

During the storm, the Director of Operations or Facilities must ensure that:



- 1- Distribute the following posted emergency announcement three times: "Attention! Please be advised that severe weather (state the weather condition) has been reported in the area. Anyone who wants to leave may do so but Emergency Management authorities advise people to remain indoors."
- 2- Monitor weather reports on TV or radio.
- 3- Verify that all management team members are aware of the information in the "General Emergencies" section and understand their roles as it relates to emergency response.
- 4- After customers and employees are taken care of, and the area is stabilized, complete all the applicable steps in the "Procedure for general emergencies" section.

9 TORNADOES

To prepare for a potential Tornado, the Director of Operations or Facilities must ensure that:

- All employees are familiar with the guidelines so they can react appropriately to the emergency.
- All shelters/emergency areas are identified and tell employees and customers about these areas.
- Employees are aware of any community warning systems (like sirens).
- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in necessary areas.
- A safe evacuation meeting point is defined and that the evacuation plan is initiated.

During the threat of a tornado, the Director of Operations or Facilities must monitor radio broadcasts for developing weather situations.

- If a Tornado WATCH is issued (meaning a tornado is possible in the area) stay tuned to the radio and television stations for more information. Be ready to take shelter.
- If a Tornado WARNING is issued (meaning a tornado has been sighted and may be headed for the area) take shelter immediately.

If a tornado is reported in the vicinity of the Facility, follow these steps:

- 1- If a tornado is approaching, repeat the following announcement three times "Attention! Please listen carefully. A tornado has been reported that might come close to the Facility. Emergency Management Authorities advise people to remain indoors."
- 2- Direct customers and Employees to the best available shelter areas
 - NOTE: Keep away from outside walls, glass windows, and doors.
- 3- Tell people to cover their heads and crouch down.
- 4- If the threat passes, continue regular Facility operations. However, if damage occurs, take care of customers and employees, stabilize the area, and complete all the applicable steps in the "Procedure for general emergencies" section.



10 CIVIL UNRESTS

10.1 Introduction

Civil unrest is an unlawful gathering of individuals that could potentially lead to rioting, dangerous situations, destruction of property, or the commission of unlawful acts that could lead to injury of employees or customers. Emergency guidelines are provided for the care and well-being of ENCHANTED ROCK employees and customers during, and after, a civil unrest emergency. In all instances, everything must be done to protect people first, and then assets. The Director of Operations must ensure that all employees are familiar with the guidelines so they can react appropriately to the emergency.

10.2 Guidelines

In case of an emergency, ENCHANTED ROCK Facilities may close or delay opening for the office personnel. Facilities should follow these guidelines:

- All Facilities should remain open unless conditions would expose employees or customers to potentially dangerous or hazardous conditions.
- Facility Management CANNOT require certain employees to come in or stay when the Executive Team has authorized a temporary or delayed opening or a Facility closing.

After completing the applicable steps for a general emergency (see the "General responsibilities Emergencies" section), the Director of Operations or Facilities must complete these steps:

- 1- Where available, ensure CCTV monitoring and video-taping is fully functional and occurring. Contact the Executive Sponsor with questions.
- 2- Any decisions to utilize police or other security services must be jointly approved by the Director of Operations and the Executive Sponsor.

11 BURGLARY / ROBBERY

11.1 Burglary

11.1.1 Before the Emergency

Before the emergency, ensure that all employees are familiar with best practices to prevent and the guidelines so they can react appropriately to the emergency.

11.1.2 After the Emergency

If signs of burglary are discovered, Facility Management must complete these steps:

1- Do NOT enter the Facility or suspected area. If the evidence of a burglary is not discovered until employees are in the Facility, move employees to the front of the Facility. Do NOT touch or enter any other areas.



- 2- Do NOT allow anyone else to enter the Facility.
- 3- Call the police (911)
- 4- Call the Director of Operations for instructions.
- 5- Make written notes of any observations and keep them for the police.
- 6- Complete the internal incident investigation form.
- 7- Do NOT discuss details of the scene or findings with anyone other than the police.

11.2 Robbery

11.2.1 Before the robbery

Before the emergency, ensure that all employees are familiar with best practices to prevent and the guidelines so they can react appropriately to the emergency.

Employees and Customers should:

- Stay calm and obey the robber. Do NOT resist the robbery in any manner.
- Notify and follow instructions from Director of Operations
- Pay attention to the robber's:
 - o sex
 - o age
 - \circ clothing
 - o accent
 - o distinguishing marks (such as birthmarks and tattoos) that are visible
 - type of weapons used
 - type of vehicle used
 - Do NOT argue or make threats
- Do NOT volunteer locations of money
- Explain any surprises (such as police officers who regularly stop by, deliveries, alarms, etc.) that may startle or excite the robber.

11.2.2 After a robbery

After robbery, the Director of Operations or Facilities must complete these steps:

- 1- Call the police (911)
- 2- Call the Executive Sponsor for instructions.
- 3- Immediately make notes about everything that was observed, including
 - Description of the suspect
 - Description of any weapons
 - Any containers used to carry the money
 - Whether the robbers knew the layout and location of money, alarms, etc.
 - The direction the robber took when leaving
 - License number and description of the vehicle used by the robbers
 - Names of witnesses



- List of what was taken
- 4- Do not move or touch anything that was touched by the suspect.
- 5- Cooperate with police in their investigation.
- 6- Do NOT
 - Release details to anyone other than police and security personnel
 - Discuss the incident with other witnesses
 - o Talk to the media

12 BOMB THREATS / THREATENING PHONE CALLS

12.1 Preparing for a bomb threat

To prepare for a potential bomb threat, the Director of Operations must ensure that all employees are familiar with the guidelines so they can react appropriately to the emergency.

- The emergency announcement is distributed through all appropriate channels.
- Emergency evacuation diagrams are posted in visible areas and are available at the reception desk.
- A safe evacuation meeting point is defined and that the evacuation plan is initiated.
- Ensure that all exits remain clear at all times
- Ensure all employees have been trained on proper response and duties
- Ensure all emergency contacts and phone numbers are available

12.2 During a threatening Call

The safety of our employees, customers, and vendors are our top priority.

If a threatening phone call (such as a bomb threat) is received, complete these steps:

- 1- Take notes and complete a Threatening Phone Call report.
- 2- Report the call to the Executive Sponsor immediately and provide the report. NOTE: If the threat is received by letter, place the letter and envelope in a bag, and inform the Director of Operations.
- 3- Notify local authorities (police) you have received a threat and provide any information available.
 - If the Facility must be evacuated proceed as follows:
 - Make the following announcement:
 - 1. "Attention! The Facility is temporarily being closed. We ask you to discontinue all activities and leave the Facility."
 - 2. Escort customers out of the Facility and across the parking lot as far as possible from the front of the Facility.
 - 3. Work with the police to allow employees and customers back into the Facility and resume normal operations.



- 4. Work with the police to allow employees and customers back into the Facility and resume normal operations.
- If the Facility must be searched:
 - Conduct a search for a device in all situations. The Facility does not have to be closed to conduct a search.
 NOTE: Do not handle items that look to be out of place. If a suspected device is found, evacuate the Facility. Do NOT handle the device.
 - 2. Contact the police immediately if a device is found (dial 911) and complete steps outlined in the "Procedure for general emergencies" section.

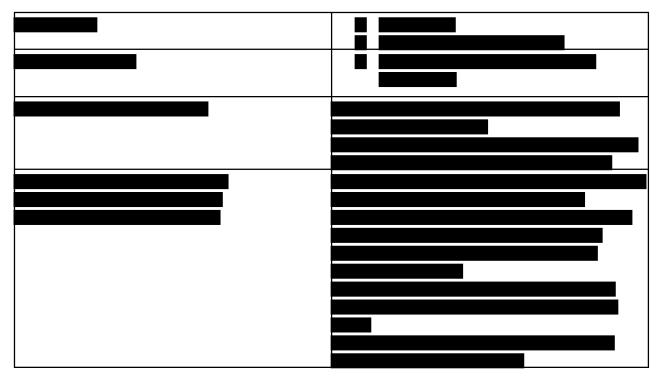
13 DISASTER MANAGEMENT ROLES & RESPONSIBILITIES

13.1 Introduction

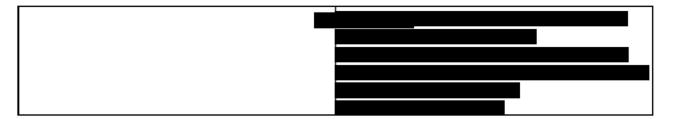
During a general emergency, personnel have specific responsibilities. The type of emergency dictates the needed action. For additional responsibilities during specific types of emergencies (such as bomb threat, fire, robbery, etc.), see the appropriate sections of this section.

13.2 Roles & Responsibilities

During a general emergency, the following resources must:





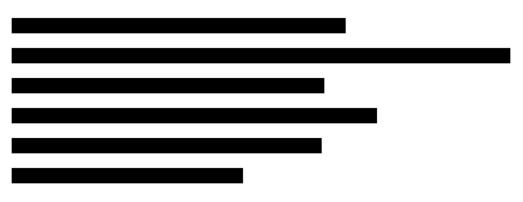


13.3 Resources

During a general emergency situation, the following items may need to be used (if available) or procured, if needed:

- Emergency walkie-talkies
- Employee emergency needs (such as food, water, clothing, etc.)
- Dumpsters
- Facility supplies
- Telephones
- Travel accommodations

13.4 Contacts and Phone Numbers



6. Restoration of Service

Each of Enchanted Rock's microgrid locations are comprised of an aggregation of several generators. The assets registered under **Power Depot – Texas Group A, LLC** are "in front of the meter" and only provide power to the bulk electric grid while the assets registered under **Texas Microgrid, LLC** and **Generate ER NG, LLC** are "behind the meter," providing power first to a customer and then to the bulk electric grid. In our applications, it is more common for a single generator to fail to start than it is for an entire site to fail. Therefore, our supply to the grid or reduction from the grid is a result of the math associated with the number of generators that have failed to start and/or the customers' load.



7. Pandemic Preparedness Measures for the Network Operations Center

Level 0 Measures – No Pandemic Threat or Pandemic Threat Has Passed

- 1. Level 0 measures shall be adopted when there is no pandemic public health emergency or the public health emergency has been determined to have passed by the US Health and Human Services Secretary.
- 2. Access shall be controlled to the Network Operating Center (NOC) as per company policy for nominal operations.
- 3. Visitors shall be allowed in the NOC.
- 4. Level 1 measures will be adopted when a pandemic public health emergency has been declared by the US Health and Human Services Secretary.

Level 1 Measures – No Known Exposure by NOC Authorized Access Personnel

- 1. Operations shall restrict NOC access to essential personnel required for continuity of service. Access to the NOC will be limited to these authorized personnel only. Signage will be posted on the door to this effect. The door to NOC to be closed and locked at all times.
- 2. 7:50am and 4:00pm market and maintenance conference calls shall continue as usual.
- 3. No visitors or unauthorized personnel will be allowed inside the NOC.
- 4. NOC personnel will wipe down and disinfect keyboards, arm rests, phones and door knobs at the end of each shift.
- 5. NOC personnel will take trash outside of NOC. No janitorial staff to enter the NOC.
- 6. Legacy and backup operators will be put through refresher training for NOC Operations and granted access to the NOC solely for the purpose of this training.
- Level 2 Measures will be implemented when directed by the Enchanted Rock CEO/COO or when HR is notified by an employee (per company policy) that the employee has 1) been in close contact with a person with the virus, is showing symptoms of the virus, or has been in close contact with someone who has recently traveled to a CDC Warning Level 2 and 3 locations <u>and</u> 2) has been in recent close contact with employees that frequent the Vine Street office.

Level 2 Measures - Exposure to the Virus by NOC Authorized Access Personnel

- 1. Operations shall begin simultaneous single-person per shift operations at Vine Street and the alternate location at **control**
- 2. The list of essential personnel required for continuity of service will be amended to include the backup operators put through refresher training under Level 1 measures.
- 3. Two essential employee access lists shall be created: one each for Vine Street and **Contract of** Operators and backup operators will be assigned to one list or the other but not both. This is to



implement a degree of social distancing between operators. The access list will consist of operators with no contact (to the greatest extent possible) within the previous 7 days with the employee(s) that self-identified under Level 1 measures.

- 4. Level 1 Measures will continue to be followed for wipe down and disinfecting between shifts at both NOC's.
- 5. 7:50am and 4:00pm market and maintenance conference calls shall continue as usual
- 6. NOC backup laptops will be cloned/mapped in preparation for Level 3 measures

Level 3 Measures - Mandated Quarantine by City, State or Federal Government

- 1. NOC operations will continue in shifts divided amongst six (6) NOC operators working from home.
- 2. Each operator will be given a NOC backup laptop and internet conference phone. The phones shall be programmed to ring simultaneously whenever either of the toll-free numbers for the NOC are dialed.
- 3. 7:50am and 4:00pm market and maintenance conference calls shall continue as usual.

8. Pandemic Preparedness Measures for Field Operations & Maintenance

Measures for Field Operations & Maintenance (O&M) shall escalate/de-escalate in step with the NOC, as defined in Pandemic Preparation Measures for the Network Operating Center.

Level 0 Measures - No Pandemic Threat or Pandemic Threat Has Passed

5. O&M employees shall continue access to Vine Street (main office) and Clifton Street (shop offices and inventory) as necessary for their assigned work.

Level 1 Measures – No Known Exposure

- 8. Face-to-face meetings for O&M employees shall be suspended. All meetings will be scheduled with a dial-in number for a conference call.
- 9. 7:30am and 3:30pm field coordination conference calls shall continue as usual.
- 10. All non-essential access of visitors or unauthorized personnel at our DG sites will be suspended. Essential versus non-essential will be determined by Vice President level of management or higher (ERO Management).
- 11. To the greatest extent possible O&M technicians shall practice personal hygiene preventative measures, for example washing hands often and wiping down shared tools with disinfectant or alcohol wipes.
- 12. Regional Managers shall coordinate load outs of the company vehicles with high usage parts and consumables in excess of the normal load in preparation for Level 2 Measures.

Level 2 Measures - After Potential or Proven Exposure to the Virus

- 7. O&M field service technicians shall not access, to the greatest extent possible, the Vine Street and Clifton Street locations. Exceptions and arrangements will be made on a case-for-case basis for access to high value spares inventory located at Clifton as determined by the Director of Field Operations & Maintenance.
- 8. The Director of Field Operations & Maintenance and the Regional Managers shall operate from the field and from their company vehicles, instead of the Clifton Street offices.



- 9. 7:30am and 3:30pm field coordination conference calls shall continue as usual.
- 10. Spend limits on the company Bento cards for expenses shall be increased to a level determined at the time by ERO Management.

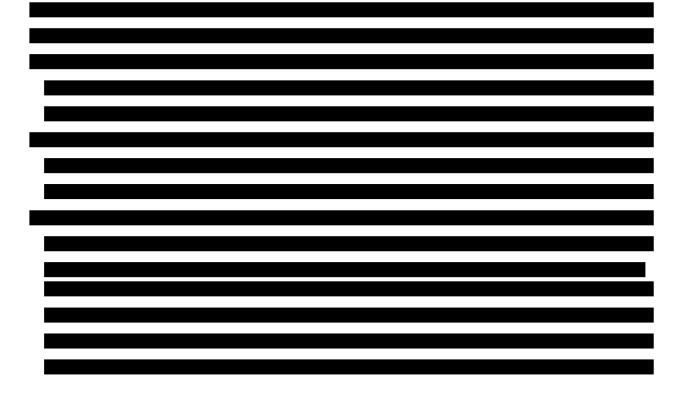
Level 3 Measures - Mandated Quarantine by City, State or Federal Government

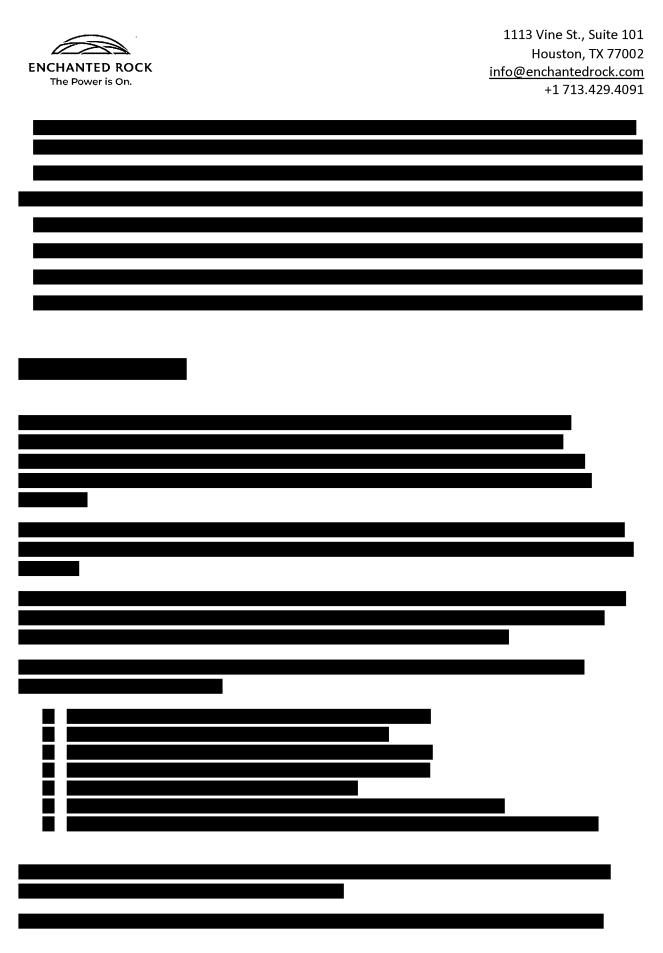
- 4. O&M field service technicians take their assigned vehicles and included inventory home with them.
- 5. O&M field services are discontinued until Level 3 Measures are lifted by CEO/COO level management.

Cybersecurity Charter – DS-GP00

Document Owner

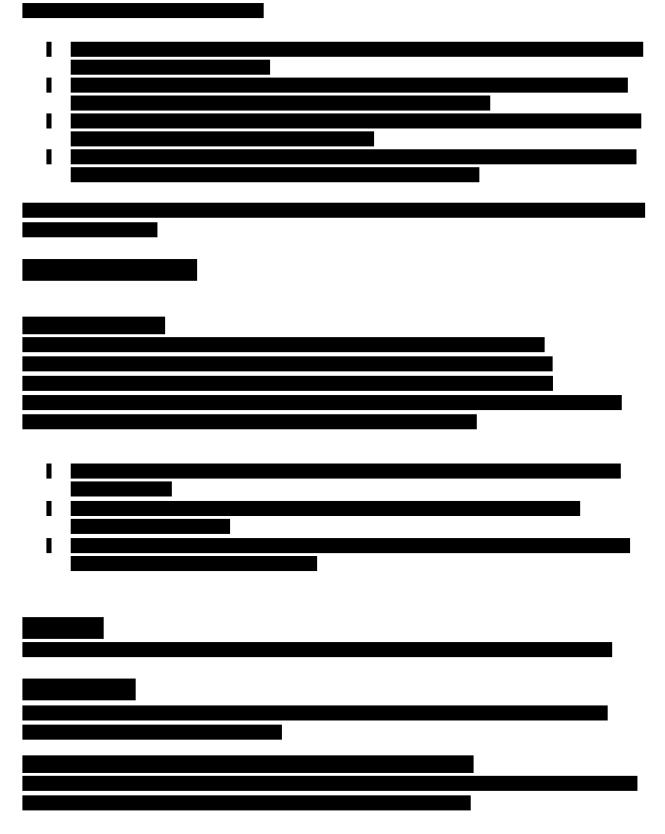
Revision	Issue date	Prepared by	Changes
1.0	7/14/2021	Steven Holtzclaw	New Document
1.1	3/16/2022	Steven Holtzclaw	Updated – 2022 Changes
1.2	03/15/2023	Sathya Long	Updated – 2023 Changes

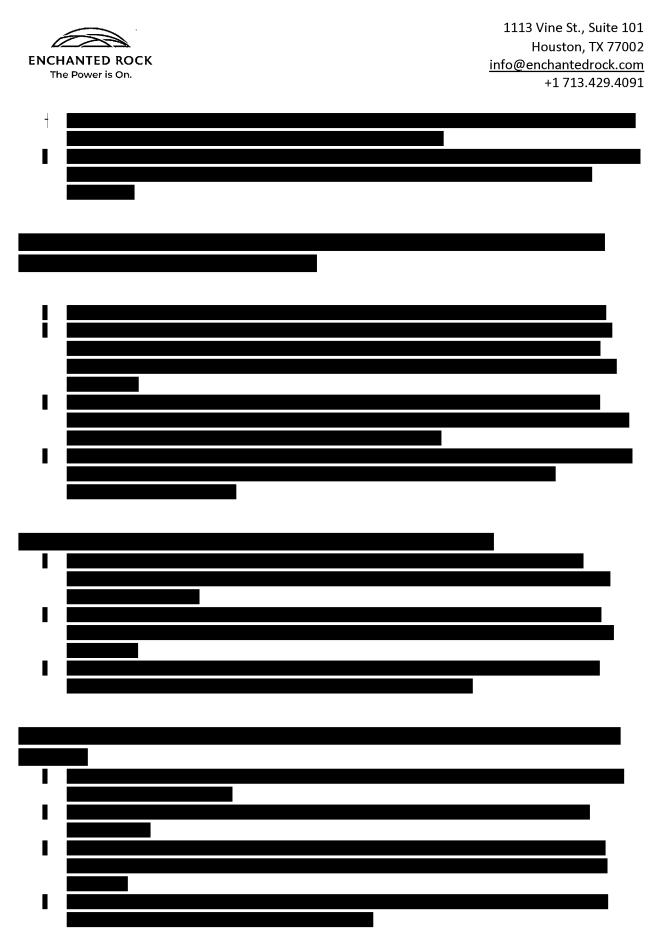


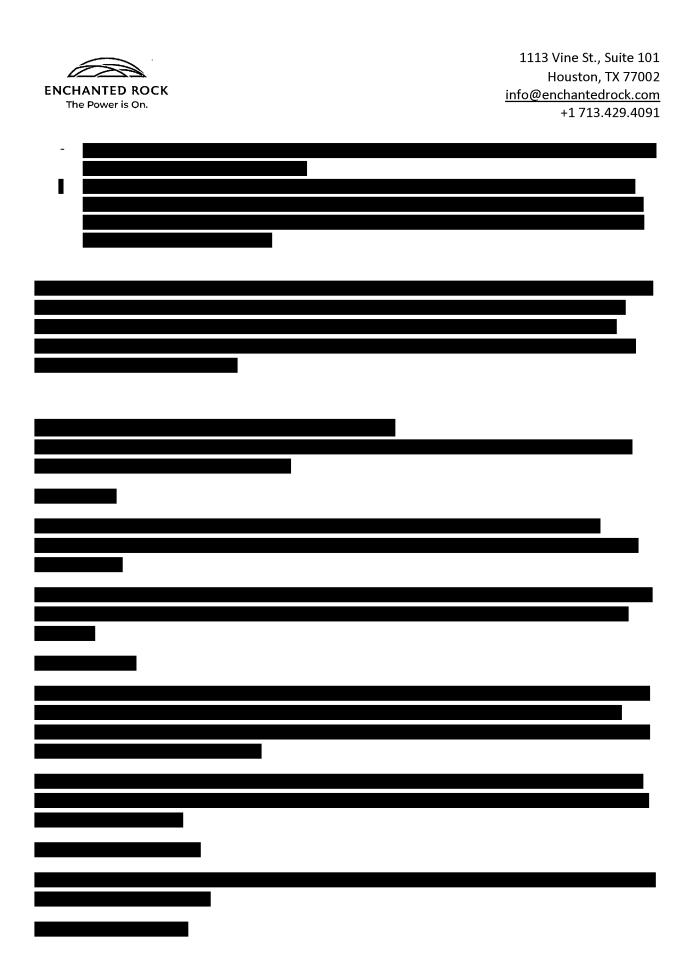














1	







Cybersecurity Incident Response Plan – DS-GP04

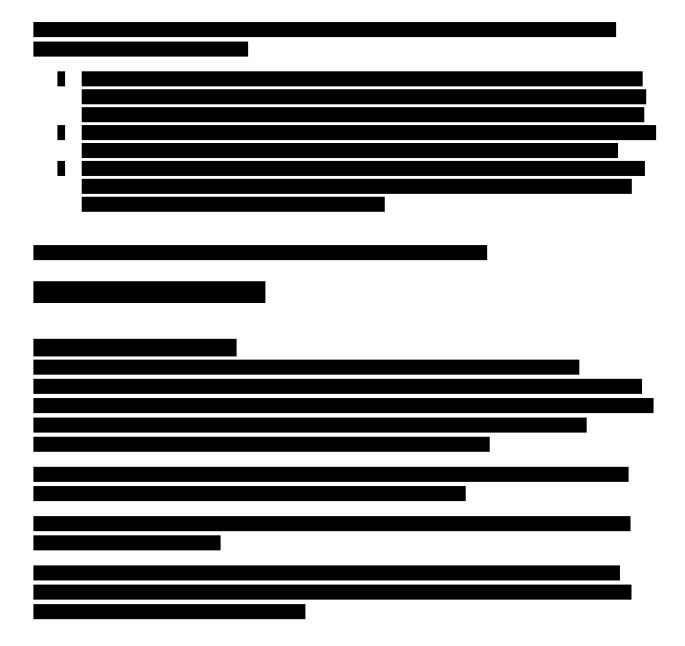
Document Owner

Revision	Issue date	Prepared by	Changes
1.0	3/29/2022	Steven Holtzclaw	New Document
1.1	03/15/2023	Sathya Long	Updated – 2023 Changes

























Appendix A. – Incident Reporting Contact

When a first witness discovers a confirmed incident, he/she must use mailing list address to alert IT:

	What to report	To whom	
Self-evident incidents	 Events that can be immediately identified as actual digital security incidents are typically: Unauthorized release of or disclosure of sensitive information; Clear sign of unauthorized access to information / systems (deleted 	If a first witness discovers such a confirmed incident, he/she must use the following mailing list addresses to signal it: SOC@enchantedrock.com	
	 information/ systems (deleted information, absence of access control on sensitive data/system). Malware infections (multiple antivirus 	This mailing list includes:	
	alerts);	Vice President of IT	
	 Intrusions against networks or systems (web site defacement, hacker's messages on internal server); Physical damage on critical accets (server) 	CSIRT & IT Ops	
	 Physical damage on critical assets (server room fire, destruction of telecom networks); Social Engineering (suspicious emails, phone calls). Theft / Loss of digital assets (laptop, smartphone, access token); 	Note : Theft / loss of digital assets must be reported first to Helpdesk.	
Potential incidents	Events that need further analysis to be confirmed as digital security incidents are typically:	If a first witness discovers a potential incident, he/she must contact the	
	 Suspicious system behavior or failure; Possible unauthorized access to information / systems; Inappropriate digital behavior; Critical system or application unavailability. 	Helpdesk for qualification of the event.	



Appendix B: Enchanted Rock Emergency Action Plan – Tornados

1.0 Purpose

The purpose of this Emergency Action Plan Appendix is to provide overall guidance for the proper emergency response actions during **tornado warnings and watches**. Information is provided for situations where the health and well-being of personnel or the environment may be impacted.

If necessary, departments which require more detailed steps/tasks shall develop those details and incorporate into their Emergency Operations Plan document.

The NOC routinely monitors the National Weather Service and other services for alerts of pending weather watches and warnings. The NOC shall monitor until the watch/warning is cancelled or EOP is overseeing the event.

2.0 Tornado Watch

- 2.1 If a Weather Service issues a tornado watch, the NOC will notify the **weather committee** via phone and text to ensure proper notification and further evaluation is conducted. The NOC shall next notify Facilities and field personnel in and management of the watch area to initiate preparations. This can include turning on weather radios, securing all items that could blow away or create damage or bring items inside and reviewing emergency procedures. Personnel at stationary locations shall make their way inside their buildings or get to a secure location.
 - **2.1.1** NOC will continue to monitor for tornado watch updates or upgrades to warning. The NOC will provide watch area and time of expiration and finally an "all clear" when appropriate.
 - **2.1.2** NOC shall take measures to confirm/identify field personnel in or near the warning area(s) and paths to create a short contact list in case the event escalates to a warning. The NOC shall then ensure notification of field employees and fixed sites within the watch area.



- **2.1.3** The weather committee shall begin preparations in the event of an upgrade to warning including notification of the EOP Team. The EOP shall confirm headcount and locations both at sites and in the field.
 - 2.1.3.1 Normal operations will continue unless a warning is issued.
 - 2.1.3.2 Helpful items to maintain for these events may include, but are not limited to: NOAA Weather Radio, first aid kit, fire extinguisher. plastic sheeting and duct tape, flashlights with extra batteries, shut-off wrenches, and other tools.

3.0 Tornado Warning

- **3.1** A tornado <u>warning</u> is an alert issued by a National Weather Services and warns that severe thunderstorms with tornadoes are imminent. The warning is issued after a tornado or funnel cloud has been spotted by eye or more commonly if there are radar indications of a tornado formation.
- 3.2 When the National Weather Service issues or upgrades to a tornado warning, <u>immediate action</u> shall be taken. The EOP team will be activated and take control during the event. Notification of the impacted locations will be directed by the EOP.
 - **3.2.1** Remain in a building or secure location or go to the nearest shelter area.
 - **3.2.2** Final decision for a shelter in place will be made by President ERO or the COO.
 - 3.2.2.1 Notified employees at stationary locations in the tornado warning and immediately secure their work area and report to the identified shelter in place locations. These should be lowest level and most interior possible.
 - 3.2.2.2 First Responders will conduct a rapid sweep at fixed facilities to ensure that all employees and visitors have been alerted are at the shelter in place.
 - 3.2.2.3 President ERO or COO or their designee will determine if employees should remain at the shelter in place or re-locate.
 - **3.2.3** Field personal shall:
 - 3.2.3.1 Attempt to determine location and path of tornado and change direction or locate a sturdy shelter.



3.2.3.2 If tornado is observed and you can-not reach safe area:

- 3.2.3.2.1 Attempt to travel at a right angle to the path of the tornado.
- 3.2.3.2.2 Stop and exit vehicle to find a location lower than the road but stay away from areas that could flood.
- 3.2.3.2.3 If a tornado observed stop and stay in car with seatbelt buckled protect your head.
- 3.2.3.2.4 Areas to avoid:
 - 3.2.3.2.4.1 Outside walls, building elevators and windows.
 - 3.2.3.2.4.2 Elevated areas of buildings.
 - 3.2.3.2.4.3 Building areas with large roof spans.
 - 3.2.3.2.4.4 Underpasses winds increase as does the debris content
 - 3.2.3.2.4.5 Seeking shelter under your vehicle.
- **3.2.4** Remain in secure locations until all clear is given.

4.0 After a Tornado

- **4.1** Sites or workers in the affected areas shall ensure safe and secure to proceed. Site coordinators or field personal shall check in with their EOP representative or through their chain of command.
- **4.2** Final headcount will be obtained by the EOP team. Any emergency notifications or response will be taken based on this headcount.
- **4.3** Non-Impacted Area.
 - **4.3.1** Ensure area is safe before leaving shelter in place area.
 - **4.3.2** Be aware of possible hazards, downed power lines, trees, etc. First responders and facilities should conduct an inspection before releasing employees to work.
- 4.4 Impacted Area
 - **4.4.1** Ensure area is safe before leaving shelter.
 - **4.4.2** Check for injuries. Do not attempt to move seriously injured people unless they are in immediate danger of further injury. Get medical assistance immediately.



- **4.4.3** Be aware of hazards such as structural, electrical and debris. Be aware of possible hazards, downed power lines, trees, etc. First responders and facilities should conduct an inspection before releasing employees to work.
- **4.4.4** Management should consult with appropriate level experts before releasing employees back to work at stationary locations. This could include emergency services, internal engineering, internal HSE and HR and external structural and electrical engineers.
- **4.4.5** Field efforts and work continuation will only occur once the situation is handled on a case-by-case basis.

5.0 Reviews and Training

- **5.1** The document as well as any departmental details will be reviewed and revised as necessary.
- 5.2 After action reviews will be conducted to validate the details.
- **5.3** Training on the Emergency Action plan will be conducted during the orientation and then annually thereafter.

AFFIDAVIT OF COREY AMTHOR

Before me, the undersigned authority, on this day personally appeared Corey Amthor, who, having been placed under oath by me, did depose as follows:

- 1. My name is Corey Amthor. I am over 18 years of age and fully competent to make this affidavit.
- 2. I am the President of Enchanted Rock Holdings, LLC, parent company to "Enchanted Rock."
- 3. All relevant operating personnel of Enchanted Rock are familiar with or have received training on the applicable contents and execution of the EOP submitted to the PUCT on April 18, 2022.
- 4. The EOP has been reviewed and approved by the appropriate executives.
- 5. Drills were conducted between May December 2022, and as a result, the EOP is being revised, as appropriate.
- 6. As attested to in my Affidavit dated April 18, 2022, the EOP or an appropriate summary was distributed to local jurisdictions, as needed.
- 7. All emergency personnel who are designated to interact with local, state and federal emergency officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training prior to December 31, 2022.
- 8. Enchanted Rock maintains a business continuity plan.

orey Amthor

Corey Amthor

SUBSCRIBED AND SWORN TO BEFORE ME by the said Corey Amthor on the ______ day

of March , 2023.

Madeline Kallubar

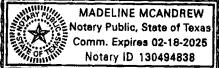


EXHIBIT B

RECORD OF DISTRIBUTION December 2022

The following persons received access to or training on Enchanted Rock's EOP

Name	Title	Access to EOP or EOP Training Date	Primary Contact During Emergency
Pete DiSanto	President, Operations	December, 2022	Yes
Adam Rohan	VP, Business & Market Operations	April, May, December 2022	Yes
Charles Kinnison	Manager, Control Center Operations	April, May, Fall 2022	Yes
Corey Amthor	President, Enchanted Rock	April, May, Fall 2022	Yes
Steven Holtzclaw	VP, Information Technology	April, May, December 2022	Yes
Kevin Barrios	Sr. Director, HR & People Strategy (Former)	April, May, 2022	No
Rick Carr	Supply Chain Director	April, May, 2022	No
Isabel Gonzalez	Procurement Manager	April, May, 2022	No
Seth Markowitz	VP, Asset Operations & Maintenance	April, May 2022	No
Chris Palmer	Director, Asset Optimization	April, May 2022	No
Paul Andrews	Director, O&M Field Services	April, May, Fall, 2022	No
Bobak Fatemizadeh	General Counsel	April, May 2022	Yes
Joel Yu	VP, Policy	April May, Fall- 2022	Yes
Taylor DeLaFosse	Sr Manager Environmental Compliance	April, May, Summer, and December 2022	No
John Brandenburg	Sr Operations Specialist	December 2022	N
Sathya Long	Cybersecurity Manager	December 2022	N
Maria Landa	Operations Director - Facilities	December 2022	N
Daniel Drazan	Energy Policy Analyst	Fall, December, 2022	N