



## Filing Receipt

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## Executive Summary

This Executive Summary provides an overview of 174 Power Global Retail Texas, LLC d/b/a Chariot Energy and Tristar Energy's process for maintaining all aspects of 174 Power Global Retail Texas' business in the event of various disasters in compliance with 16 Tex. Admin. Code §25.53, Public Utility Commission of Texas ("PUCT") substantive rule regarding Electric Service Emergency Operations Plan ("Rule").

Since 2019, 174 Power Global Retail Texas, LLC has operated and conducted business as a retail electric provider ("REP") under REP Certificate No. 10260 under its assumed name "Chariot Energy." See Docket Nos. 49030 and 49315. Chariot Energy filed its Emergency Operations Plan with the PUCT on April 15, 2022.

On May 16, 2022, 174 Power Global Retail Texas, LLC filed an application in Docket No. 53482 to amend its REP Certificate No. 10260 to add the assumed name of "Tristar Energy" to its certificate. The Commission issued a Notice of Approval on July 11, 2022 approving 174 Power Global Retail Texas, LLC's application and its requested assumed name of Tristar Energy.

Therefore, in accordance with 16 TAC § 25.53, 174 Power Global Retail Texas, LLC files an updated Executive Summary and Emergency Operations Plan ("EOP" or "Plan") applicable to both of its assumed names, Chariot Energy and Tristar Energy. 174 Power Global Retail Texas, LLC's Executive Summary, EOP, and related annexes apply to both Chariot Energy and Tristar Energy, and all references to 174 Power Global Retail Texas, LLC in the Executive Summary and the EOP shall include both Chariot Energy and Tristar Energy.

174 Power Global Retail Texas, LLC's Emergency Operations Plan, including all attachments and annexes, describe the policies and processes for 174 Power Global Retail Texas, LLC to follow during emergency operations. 174 Power Global Retail Texas, LLC will respond to emergency situations and activate the EOP and the appropriate annex(s) in such emergencies.

Table 1 provides an overview of the contents and policies included in 174 Power Global Retail Texas, LLC's EOP.

Policy	Section
EOP Approval and Implementation Requirements	1
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Table 2 provides an overview of the Plan's compliance with the Rule's requirements for REP's.

Citation	Description of Requirement	EOP Section	EOP Page Number
25.53(d)(1)(A)	Approval and Implementation- Introduction and Applicability	1	3
25.53(d)(1)(B)	EOP Maintenance and Modification	2	3
25.53(c)(4)(B)	Emergency Contacts	3	4
25.53(d)(1)(C)	Revision Control Summary	4	4
25.53(d)(1)(D)	EOP Approval Statement	5	4
25.53(d)(1)(E)	EOP Approval Date	5	4
25.53(c)(4)(A)	Record of Distribution	6	5
25.53(d)(2)(C)	Communication Plan for REPs	8-12	7-10
25.53(d)(3)	Plan to maintain pre-identified supplies for emergency response	14	11
25.53(d)(4)	Plan that addresses staffing during emergency response	13	11
25.53(d)(5)	Plan that addresses how an entity identified weather-related hazards.	15	11
25.53(e)(3)(A)	Pandemic and Epidemic Annex	21	26
25.53(e)(3)(B)	Hurricane Annex	20	25
25.53(e)(3)(C)	Cyber Security Annex	22	27
25.53(e)(3)(D)	Physical Security Annex	18	21-23

Table 3 lists the titles and names of employees receiving access to and training on the Plan, including the date of access.

<b>174 POWER GLOBAL RETAIL TEXAS EMERGENCY OPERATIONS PLAN RECORD OF DISTRIBUTION</b>		
Employee Name	Title	Date of Distribution
In Kyu Park	Chief Executive Officer	3/15/2023
Mohsin Khoja	Chief Operating Officer	3/15/2023
Sajjad Mussani	Chief Information Officer	3/15/2023
Amir Khan	Sr. Director of Operations	3/15/2023
Brian Armentrout	Sr. Director of Marketing	3/15/2023
Britney Taylor	Operations Manager	3/15/2023
Tim Richmond	Sr. Manager of Business Development	3/15/2023
Star Rodriguez	Accounting Manager	3/15/2023
Youngwoo Nam	Director of Strategy and IT	3/15/2023
David Hunsaker	Sr. Manager of Supply (Pricing)	3/15/2023
Shundrika Houston	Sr. AR/Operations Analyst	3/15/2023
Nadevia Washington	Sr. Billing Analyst	3/15/2023
Jessica Hernandez	Sr. Operations Analyst	3/15/2023

Table 4 lists 174 Power Global Retail Texas, LLC's emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency.

<b>CHARIOT ENERGY EMERGENCY CONTACTS</b>				
Employee Name	Title	Phone Number	Email Address	
Amir Khan	Senior Operations Director			Primary Contact
Mohsin Khoja	Chief Operating Officer			Backup Contact
Carolyn Byun	Chief Legal Officer			Backup Contact

# CEO Affidavit for Emergency Operations Plan


## AFFIDAVIT

STATE OF TEXAS                   §  
                                                 §  
COUNTY OF HARRIS           §

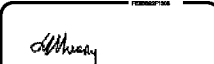
1. My name is Henry Yun. I am the CEO and President of 174 Power Global Retail Texas, LLC.

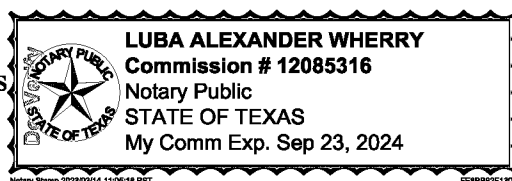
1. I swear or affirm that with respect to the Emergency Operations Plan (EOP) for 174 Power Global Retail Texas, LLC, each of following statements is true and accurate to the best of my knowledge.

- a. All relevant operating personnel are familiar with and have, or will 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.
- b. The EOP has been reviewed and approved by the appropriate executives.
- c. Drills that test this EOP have been, or will be, conducted to the extent required by Commission rules.
- d. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
- e. 174 Power Global Retail Texas, LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
- f. 174 Power Global Retail Texas, LLC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received or will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

  
Signature  
Name: Henry Yun  
Title: CEO and President  
174 Power Global Retail Texas, LLC

SWORN TO AND SUBSCRIBED before me on the 14<sup>th</sup> day of March 2023

  
Luba Alexander Wherry  
Notary Public In and For the State of Texas  
My Commission Expires:



**174 Power Global Retail Texas, LLC**

**Emergency Operations Plan (EOP)**

**REP Certificate Number: 10260**

**Address: 2800 Post Oak Blvd, Suite 4100, Houston, TX 77056**



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## EOP Approval and Implementation Requirements

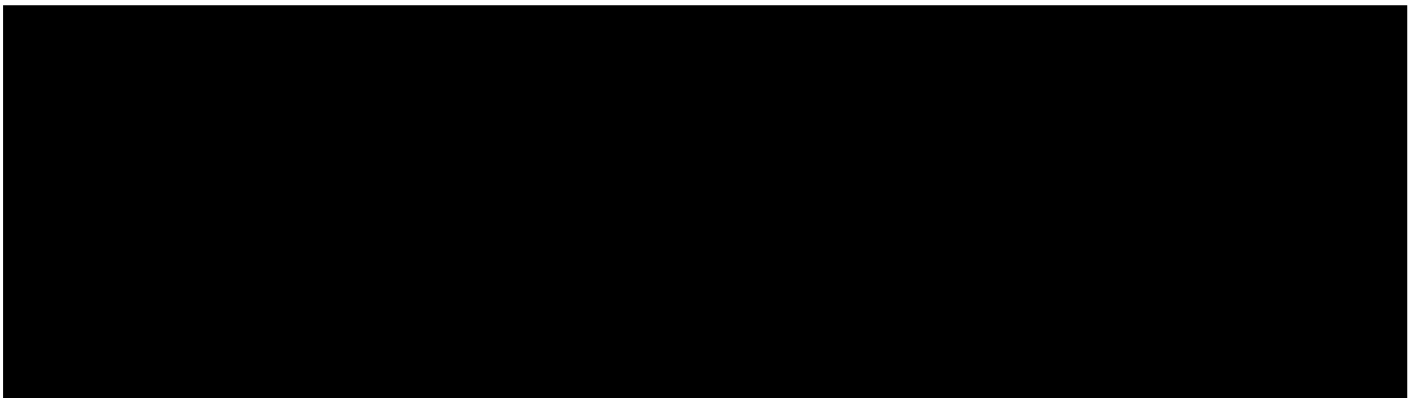
This Emergency Operations Plan (EOP) and related annexes describes the policies and processes for 174 Power Global Retail Texas, LLC d/b/a Chariot Energy and Tristar Energy to follow during emergency operations in accordance with the requirements of Chapter 25, Subchapter C, §25.53, of the PUCT Electric Substantive Rules.

Since 2019, 174 Power Global Retail Texas, LLC has operated and conducted business as a retail electric provider ("REP") under REP Certificate No. 10260 under its assumed name "Chariot Energy." See Docket Nos. 49030 and 49315. On May 16, 2022, 174 Power Global Retail Texas, LLC filed an application in Docket No. 53482 to amend its REP Certificate No. 10260 to add the assumed name of "Tristar Energy" to its certificate. The Commission issued a Notice of Approval on July 11, 2022 approving 174 Power Global Retail Texas, LLC's application and its requested assumed name of Tristar Energy. Therefore, in accordance with 16 TAC § 25.53, 174 Power Global Retail Texas, LLC provides the following information on behalf of its assumed names Chariot Energy and Tristar Energy.

This EOP, including all attachments and annexes, applies to, and will be used by 174 Power Global Retail Texas, LLC to respond to emergency situations and activate the EOP and the appropriate annex(s) in such emergencies.

174 Power Global Retail Texas, LLC's Executive Summary, EOP, and related annexes apply to both Chariot Energy and Tristar Energy, and all references to 174 Power Global Retail Texas, LLC shall include both Chariot Energy and Tristar Energy.

The following events will trigger the activation and implementation of 174 Power Global Retail Texas, LLC's EOP as necessary to the region or affected area of Texas.



### Individuals Responsible for Maintaining and Implementing the Emergency Operations Plan

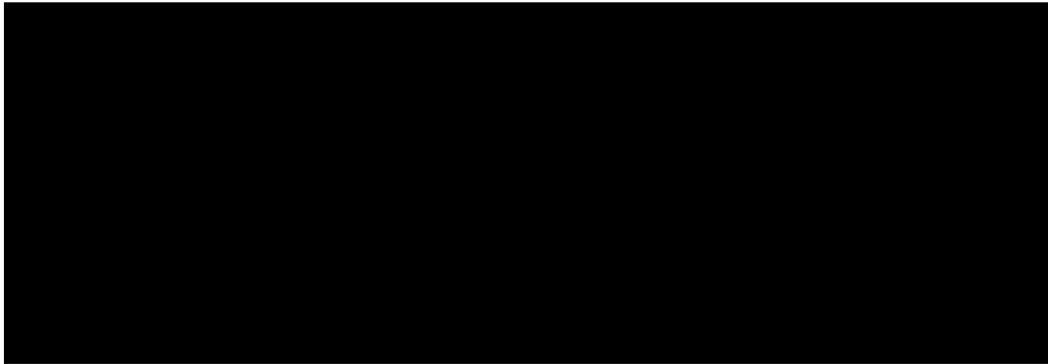
Below are the individuals within 174 Power Global Retail Texas, LLC responsible for maintaining and implementing the EOP, including those who will interact with local, state, and federal emergency management officials, and those who can change the EOP.





## Emergency Contact Information for Emergency Operations Plan

Below is a list of primary and, backup emergency contacts for 174 Power Global Retail Texas, LLC, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.



## Revision Control Summary to Emergency Operations Plan

The below revision control summary lists the dates of each change made to the EOP .

Version 1: April 15, 2022 – Initial EOP Filing

Version 2: March 15, 2023 – EOP updated to expand applicability to Tristar Energy.

## Approval Statement for New Emergency Operations Plan

This EOP was approved on March 14, 2023 and supersedes previous EOPs.

By: 

Name: Henry Yun

Title: CEO and President

March 14, 2023



## Record of Distribution, Drill and Training for new Emergency Operations Plan

Below provides a record of distribution that contains the following information in table format:

- Titles and names of persons in the entity's organization receiving access to & training on the EOP. Employees received training on the EOP in 2022. The processes and procedures governing 174 Power Global Retail Texas, LLC's response to emergency situations have not changed; in accordance with 16 TAC § §25.53, 174 Power Global Retail Texas, LLC updated its EOP to apply to both of its assumed names, Chariot Energy and Tristar Energy.
- Dates of access to or training on the EOP, as appropriate
- Dates of annual drill, and indication of what drill type was performed
- New employees who were onboarded in 2023 will receive training on the EOP in May 2023.

		EOP Training, Drill Exercise and Distribution		
Employee Name	Title	Training Date (2022)	Estimated Training Date	Estimated Drill Date
In Kyu Park	Chief Executive Officer	N/A	5/3/2023	5/16/2023
		[List dates for each employee]		
Mohsin Khoja	Chief Operating Officer	5/20/2022	5/3/2023	5/16/2023
Sajjad Mussani	Chief Information Officer	5/20/2022	5/3/2023	5/16/2023
Amir Khan	Sr. Director of Operations	5/20/2022	5/3/2023	5/16/2023
Brian Armentrout	Sr. Director of Marketing	5/20/2022	5/3/2023	5/16/2023
Britney Taylor	Operations Manager	5/20/2022	5/3/2023	5/16/2023
	Sr. Manager of Business Development	5/20/2022	5/3/2023	5/16/2023
Tim Richmond	Accounting Manager	N/A	5/3/2023	5/16/2023
Star Rodriguez	Director of Strategy and IT	5/20/2022	5/3/2023	5/16/2023
Youngwoo Nam	Sr. Manager of Supply (Pricing)	5/20/2022	5/3/2023	5/16/2023
David Hunsaker	Sr. AR/Operations Analyst	5/20/2022	5/3/2023	5/16/2023
Shundrika Houston	Sr. Billing Analyst	N/A	5/3/2023	5/16/2023
Nadevia Washington	Sr. Operations Analyst	5/20/2022	5/3/2023	5/16/2023
Jessica Hernandez				

### REP Required Drills

- REPs must conduct or participate in at least one drill each calendar year to test its EOP.
- Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed.
- If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex.



- 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.

### **Drill Notification**

An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill.



# CEO Affidavit for Emergency Operations Plan


## AFFIDAVIT

STATE OF TEXAS                   §  
                                                 §  
COUNTY OF HARRIS           §

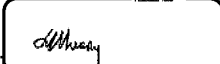
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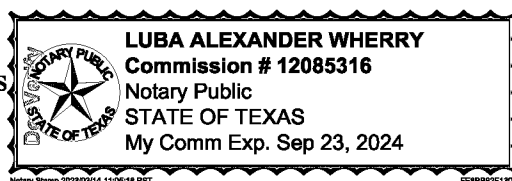
1. I swear or affirm that with respect to the Emergency Operations Plan (EOP) for 174 Power Global Retail Texas, LLC, each of following statements is true and accurate to the best of my knowledge.

- a. All relevant operating personnel are familiar with and have, or will 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.
- b. The EOP has been reviewed and approved by the appropriate executives.
- c. Drills that test this EOP have been, or will be, conducted to the extent required by Commission rules.
- d. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
- e. 174 Power Global Retail Texas, LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
- f. 174 Power Global Retail Texas, LLC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received or will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

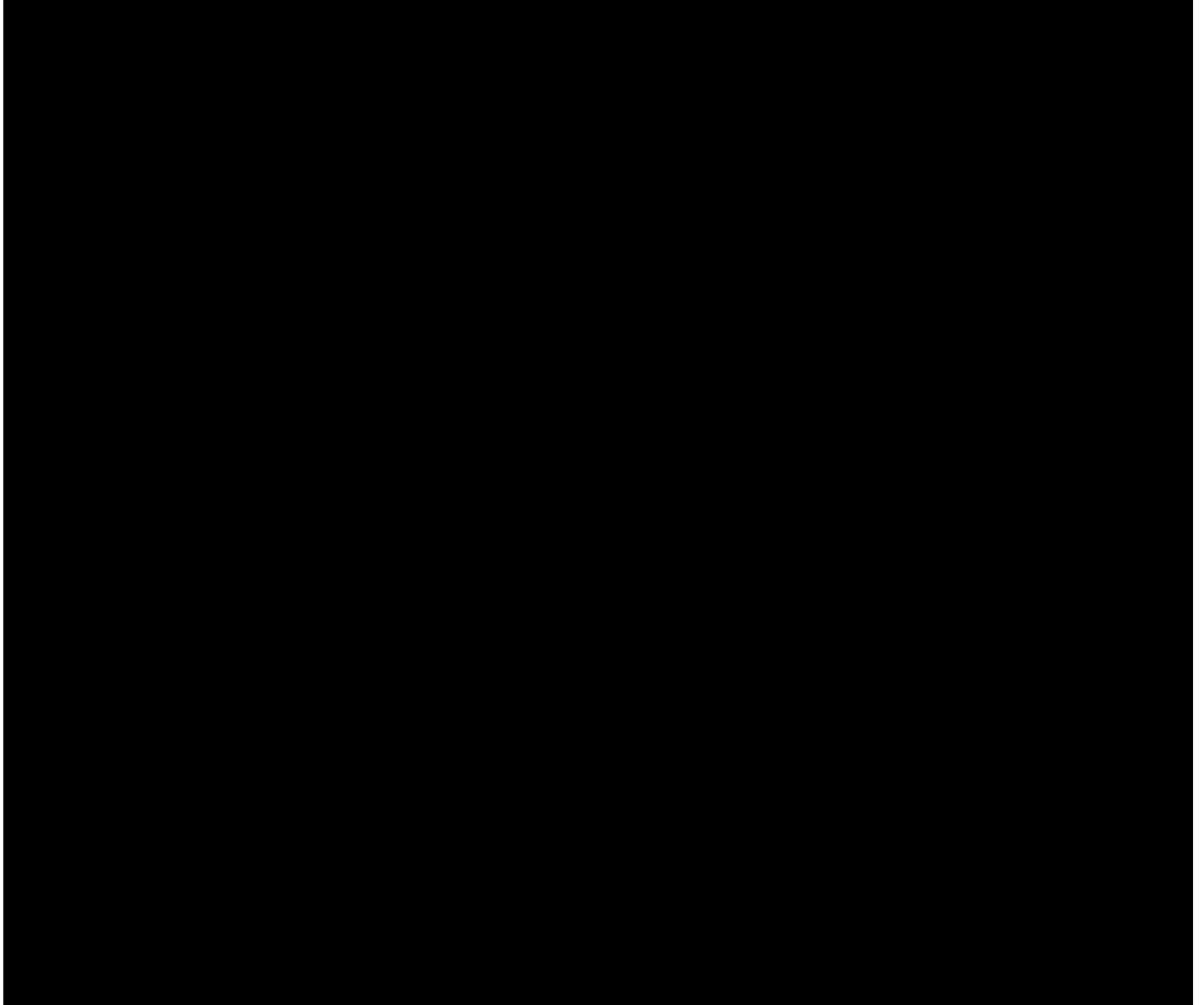
  
Signature  
Name: Henry Yun  
Title: CEO and President  
174 Power Global Retail Texas, LLC

SWORN TO AND SUBSCRIBED before me on the 14<sup>th</sup> day of March 2023

  
Luba Alexander Wherry  
Notary Public In and For the State of Texas  
My Commission Expires:



## Communication Plan – Public/Media

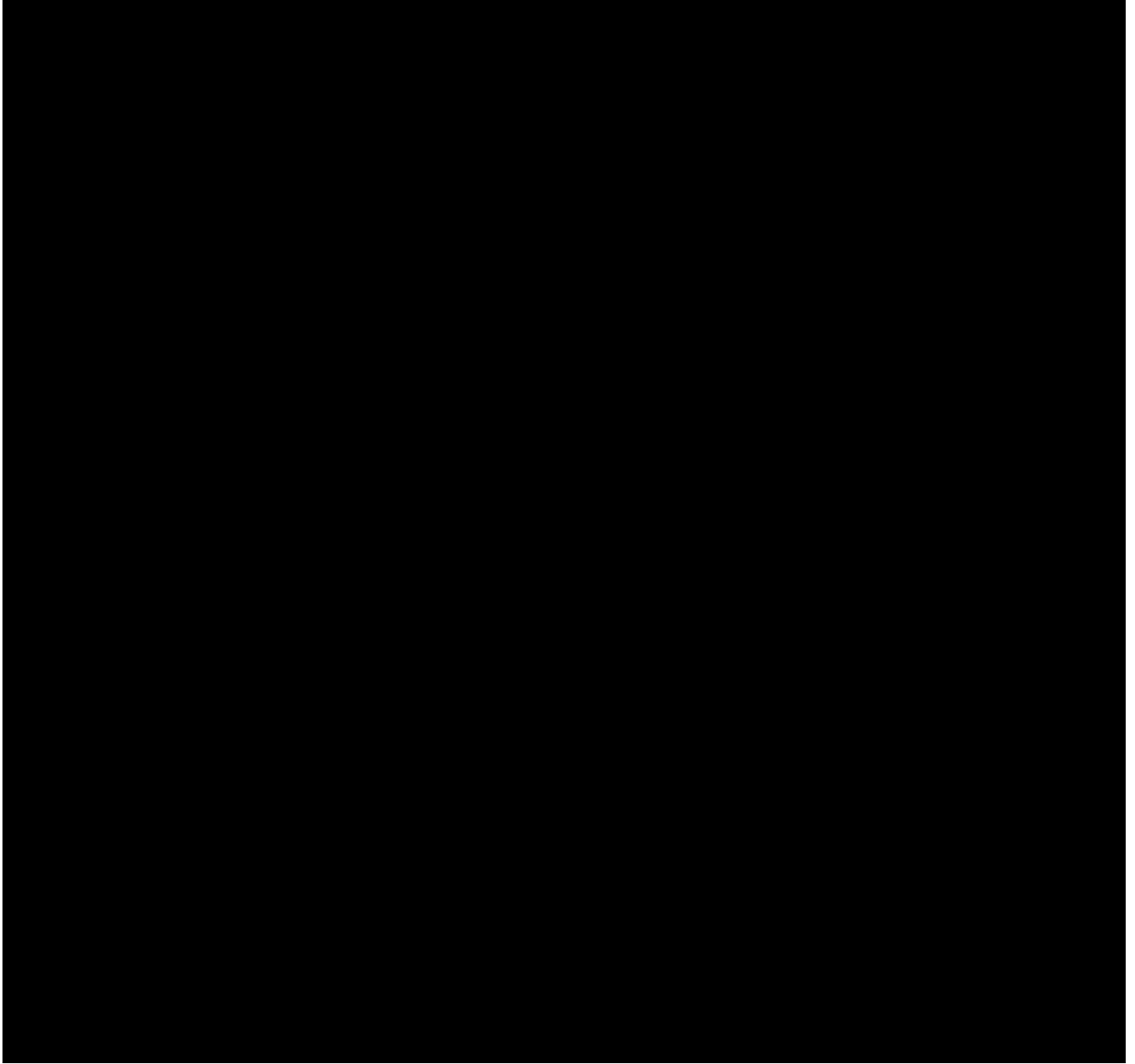


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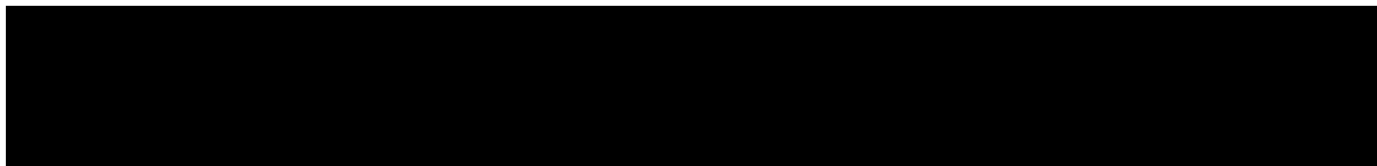
## Communication Plan – Customers

During an emergency, 174 Power Global Retail Texas, LLC will inform customers via telephone (locations in multiple geographic locations), mass email, SMS and/or automated outbound dialer that customers may contact 174 Power Global Retail Texas, LLC to perform the following activities:

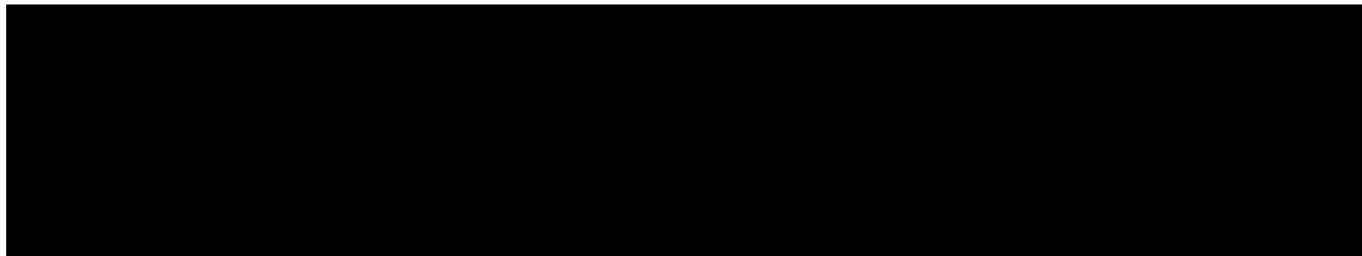




## Communication Plan – Commission & OPUC



## Communication Plan – Complaint Handling



## Communication Plan – Employees

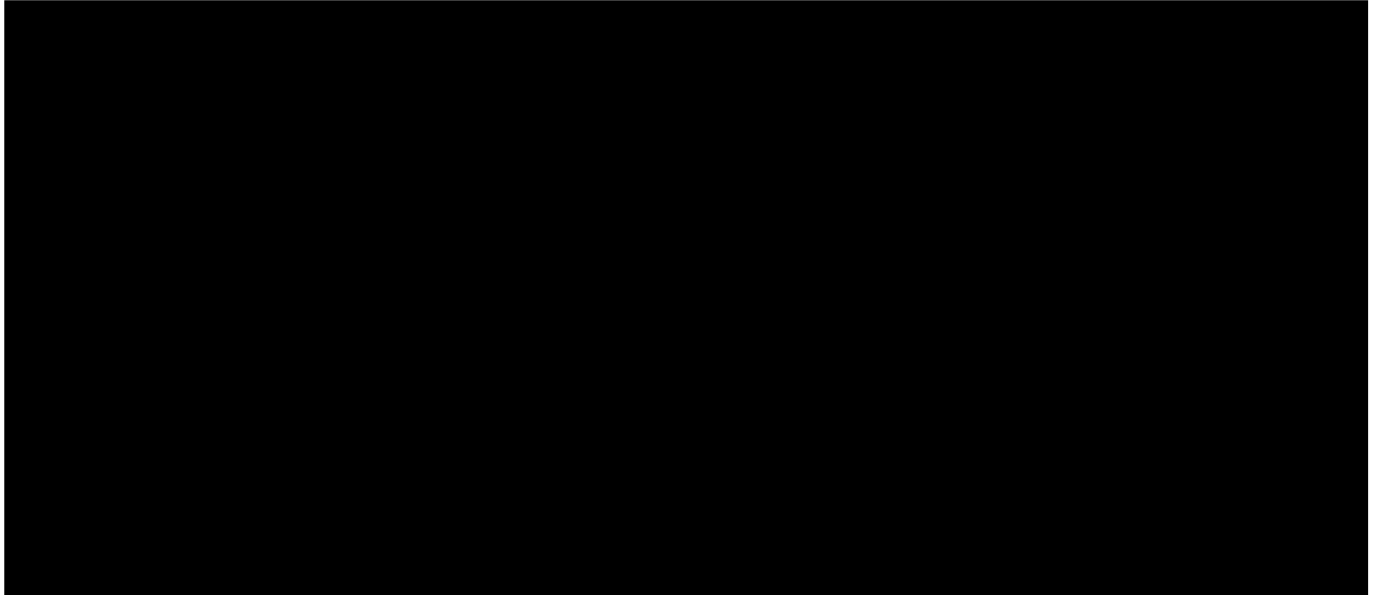
It is impossible to provide specific information for all situations. There is no guarantee implied by this plan that perfect response to disaster emergency incidents will be practical or possible. Therefore, this four-phased plan, as described below, plan is a guide for 174 Power Global Retail Texas, LLC to use help prepare for emergency planning, response, and evacuation. Preparation will increase the margin of safety in an emergency. While the types of emergencies vary there are two that affect the business and the employees differently; emergencies that prevent us from working in the office space, and emergencies that can force employees to leave the city. We have purposely broken them into two because it requires two different responses. **However, it is ultimately up to each employee to do what is best for their health and safety. Communicating effectively with management will aid in preparing for changes in the plan.**

If the State Operations Center (SOC) declares an emergency event, 174 Power Global Retail Texas, LLC is prepared to ensure business continuity of daily operations as listed in this document. Depending on the type and severity of the situations 174 Power Global Retail Texas, LLC will abide by the State's request up to and including evacuation, remaining at the office, working from home or temporary location, etc. 174 Power Global Retail Texas, LLC is prepared to do everything within the capability of its employees and systems to meet the needs of the customers for the duration of the State issued emergency. Based on the type of emergency, 174 Power Global Retail Texas, LLC employees will follow either the evacuation or non-evacuation plan. **Management and employees are asked to keep open lines of communication to address business continuity issues.**

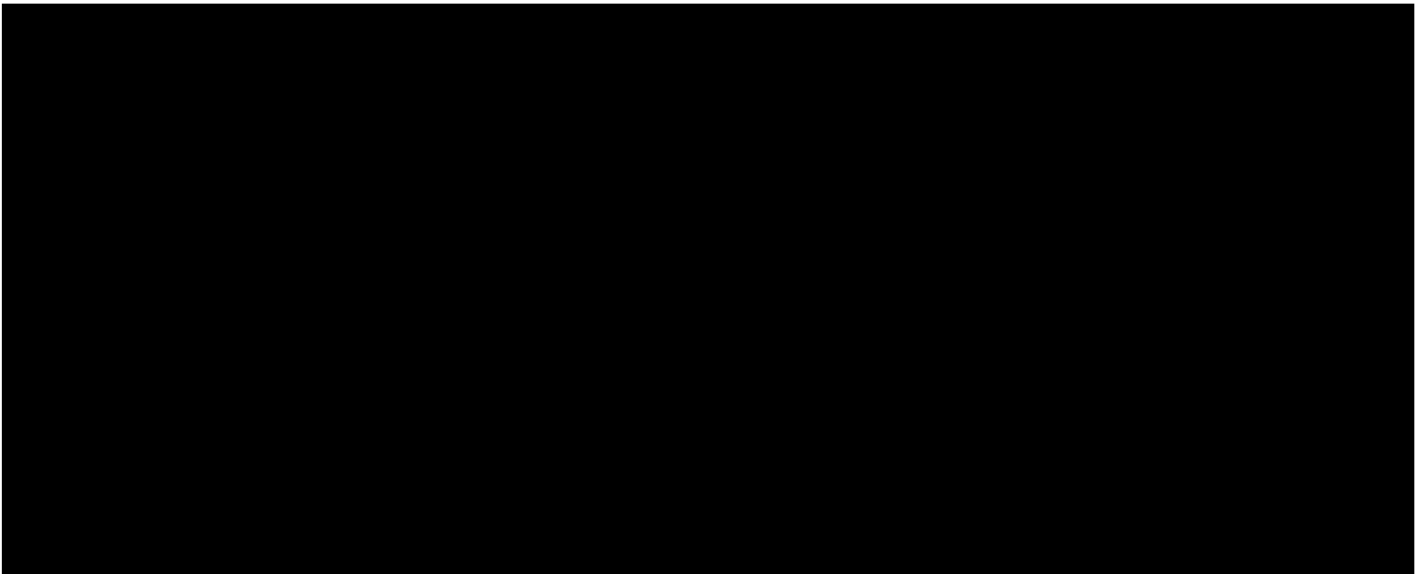


## Staffing Plan

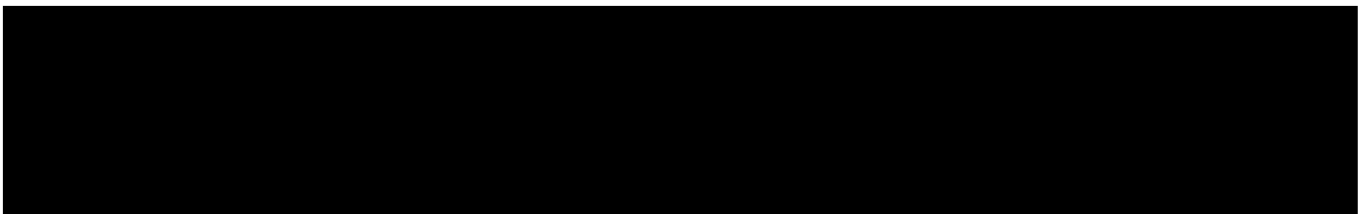
### Staffing Plan for Emergency



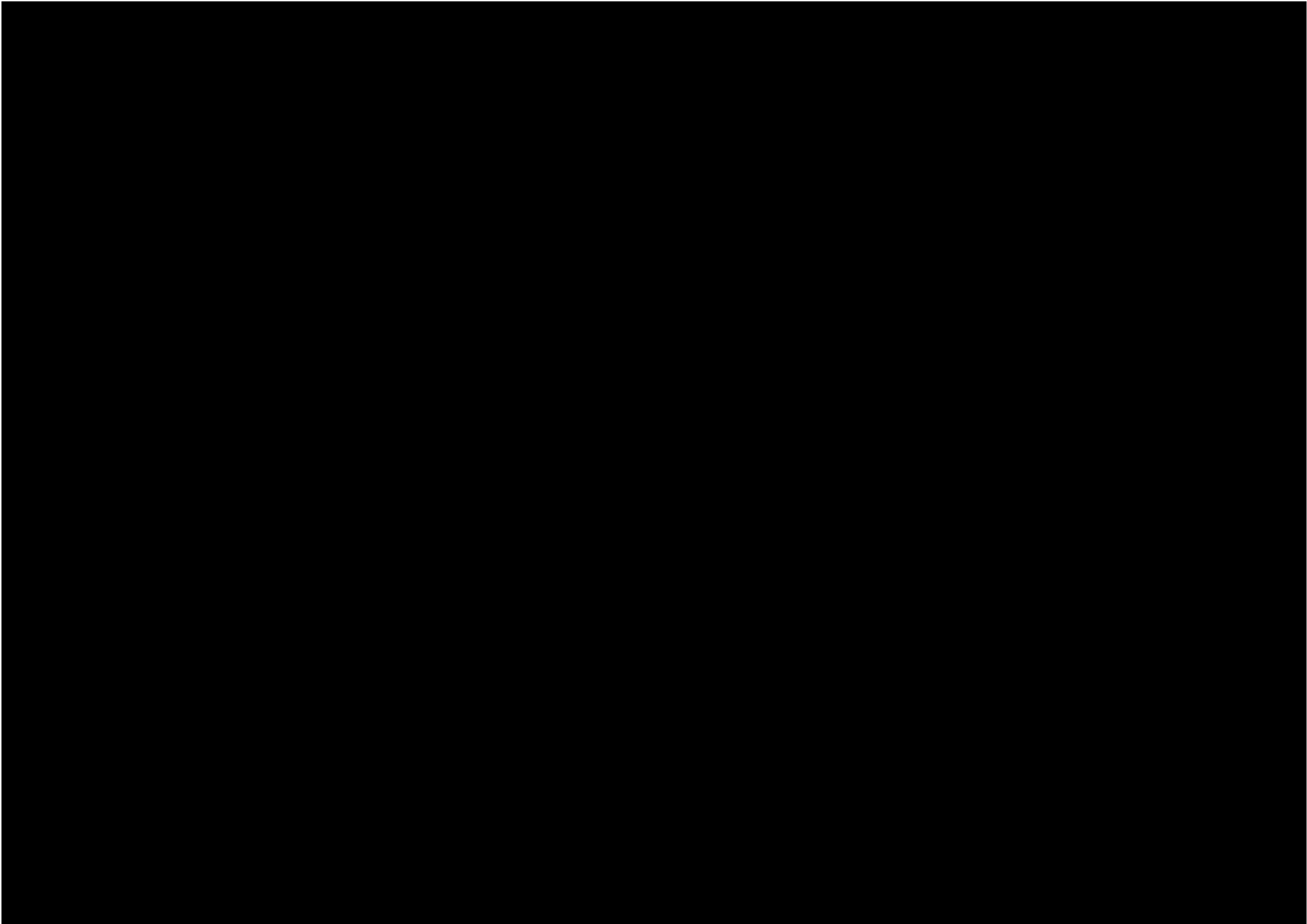
### Pre-Identified Emergency Supplies Plan



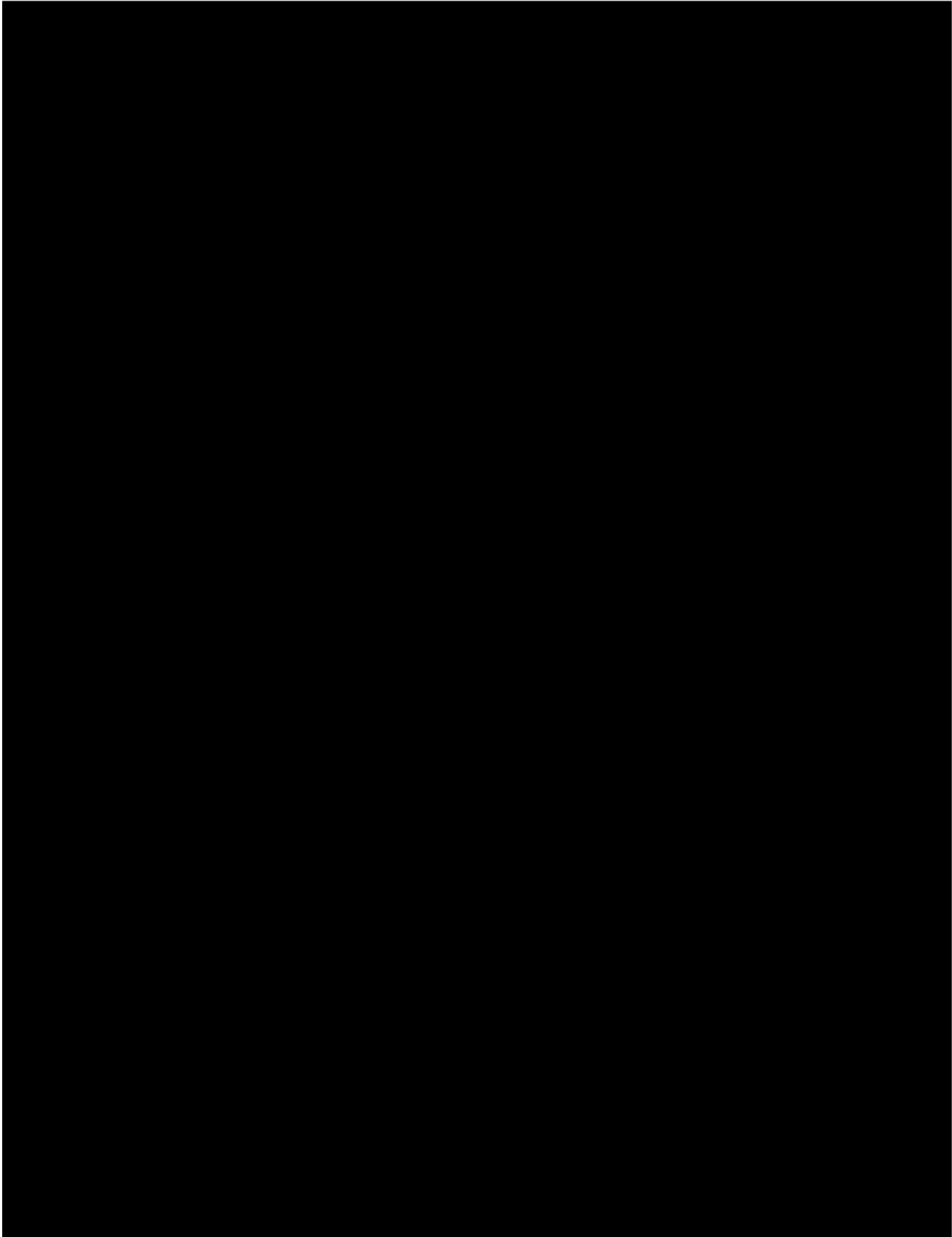
### Weather Monitoring Plan



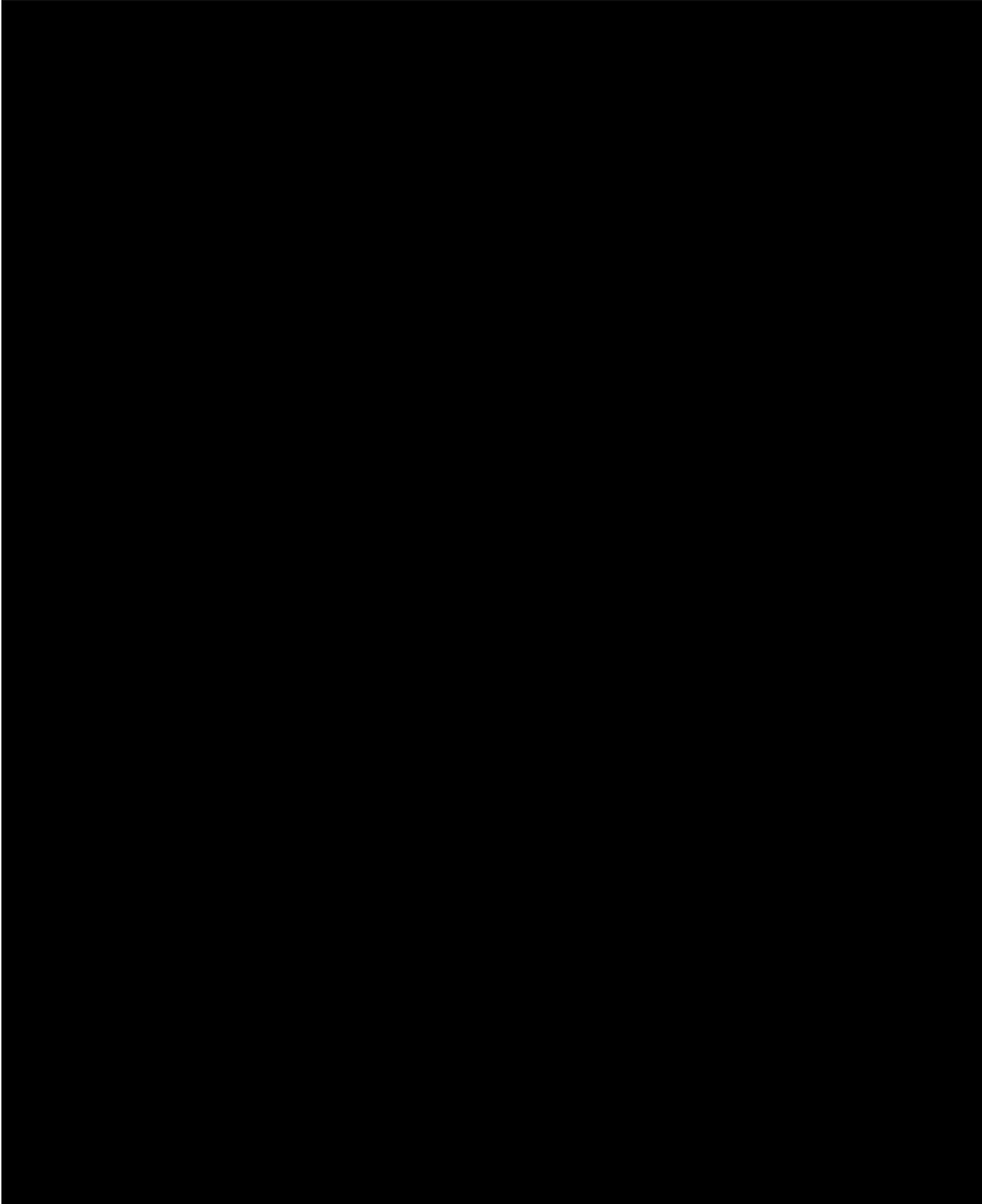
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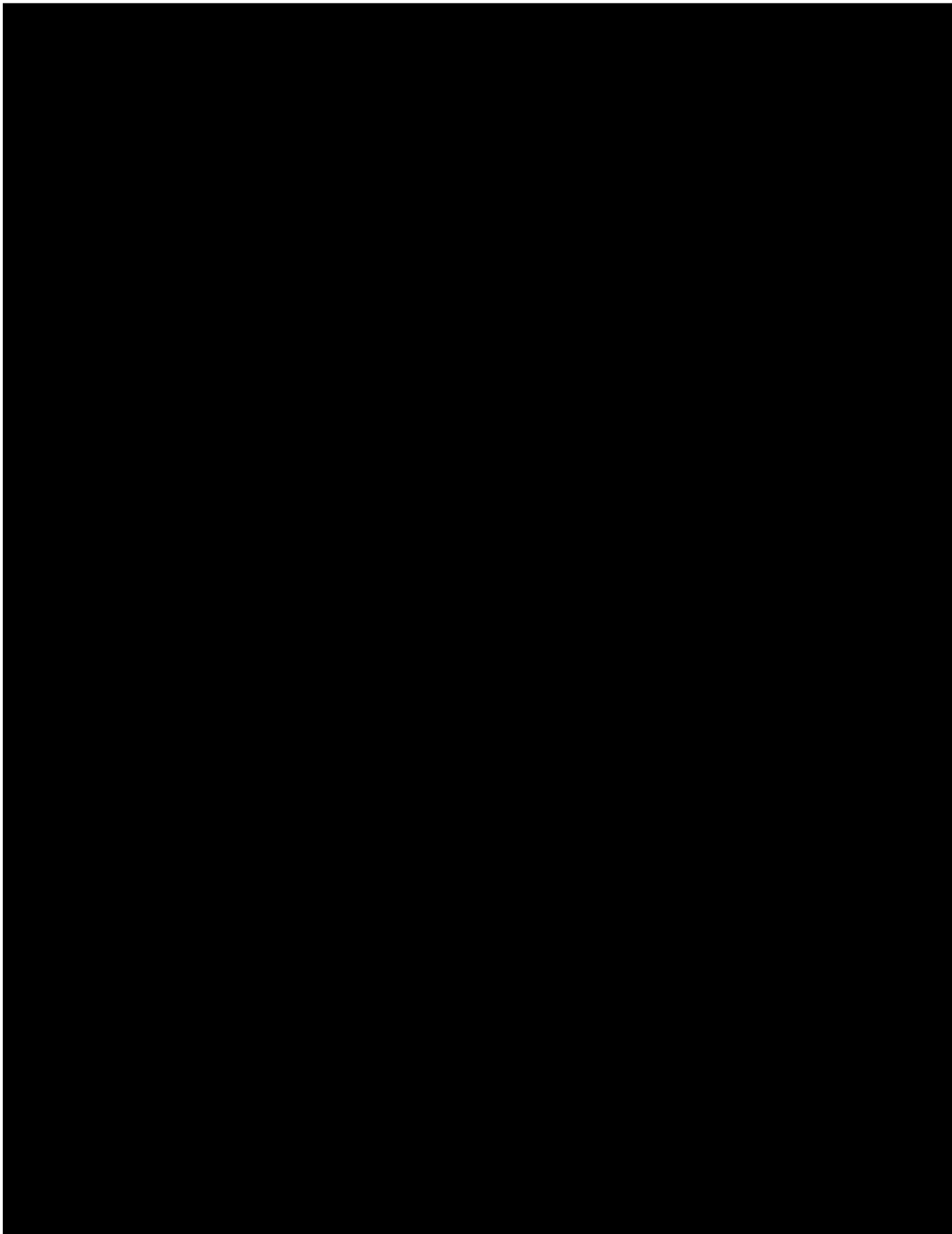
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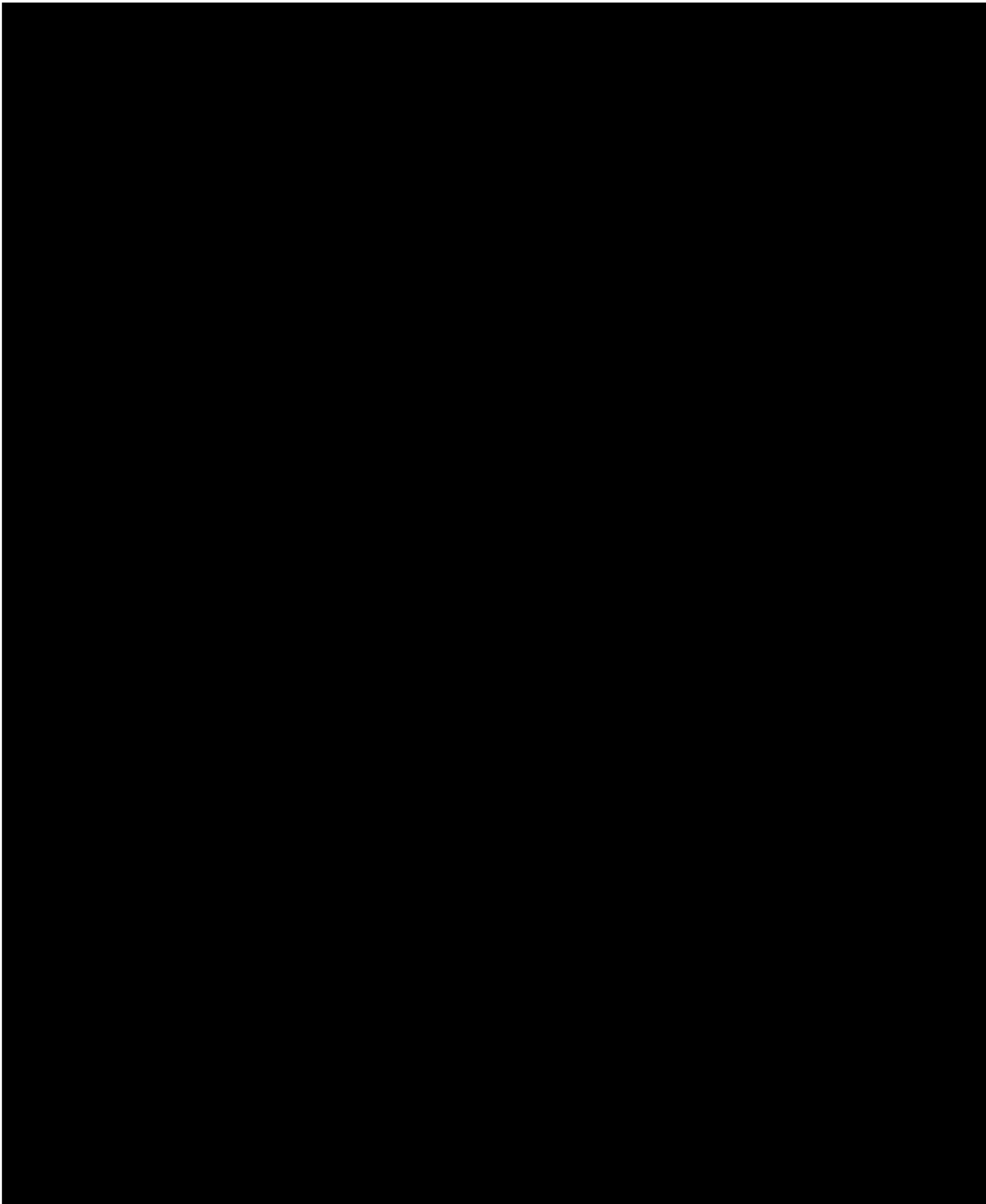
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## **Williams Tower Building Emergencies**

### **Emergency Contacts**

- Property Management Office: [REDACTED]
- 24-Hour Lobby Security Console: [REDACTED]
- Houston Fire, Police, & Ambulance: 911
- SMS Group Text

### **Medical Emergency**

- In the event of a medical emergency, first, call 911 and request the appropriate response. Next, please contact the Property Management Office at [REDACTED] immediately and report the following information:
  - Your name, company's name, and location.
  - The nature of the medical emergency.
  - Exact location and name of the person the situation is about.
  - Verify that an ambulance has been requested and is on its way to the building.
  - Property Management and Security will assist the 911 response.

### **Evacuations**

- In the event of a building evacuation please follow instructions given by building and emergency personnel.

### **Elevator Emergency**

- [REDACTED]
- Should the car stop between floors and the door opens, do not ever attempt to climb out or jump to the floor below, as help will be there in minutes to assist with the situation.

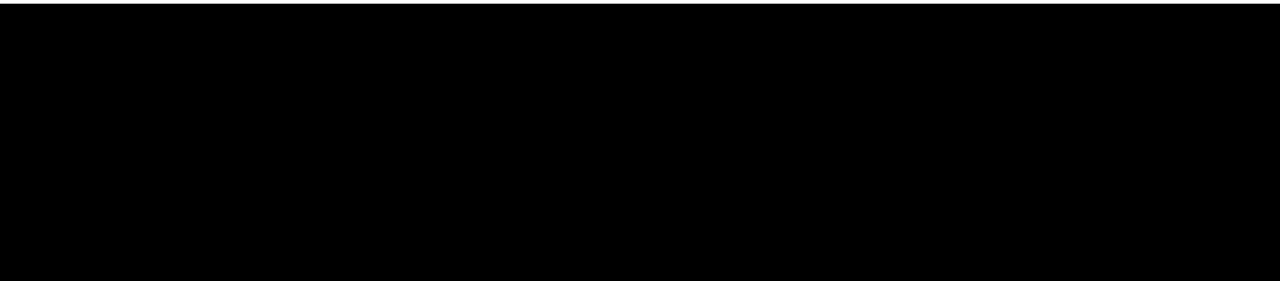


## Fire Emergency

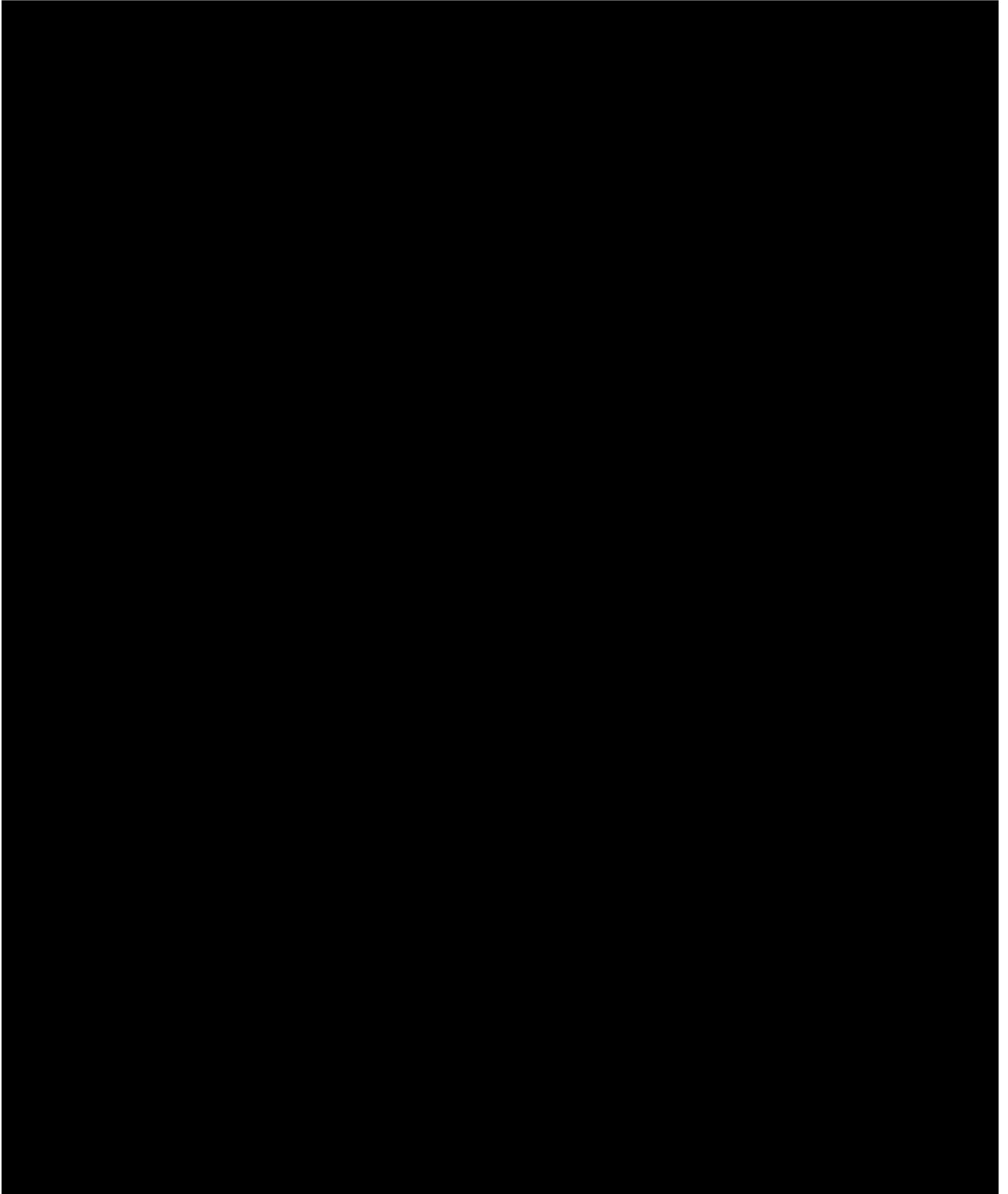
- Fire Evacuation Plan / Fire During Working Hours
  - IF YOU SEE FIRE, SMOKE OR SMELL SOMETHING BURNING
  - Immediately call the Fire Department at 911 and/or activate the fire alarm pull station.
  - Call Property Management at [REDACTED]
  - Isolate the fire, if possible, by closing the door.
  - Contact the Property Management office, 24-hour Lobby Security, and 911 and give the location and severity of the fire.
    - Property Management Office: [REDACTED]
    - 24-Hour Lobby Security Console: [REDACTED]
    - If directed to evacuate by the fire department or the Property Management Office, or if unsafe conditions warrant leaving the floor, evacuate DOWN to the next re-entry floor by using the fire exit stairs...never use the elevator!
  - IF YOU THINK YOU SMELL SMOKE
    - Immediately call Property Management at [REDACTED] and provide the location and characteristic of the odor.
  - IF YOU HEAR THE FIRE ALARM
    - Direct all occupants on the floor in alarm to the fire exit stairs and await further instructions.
- Fire Evacuation Plan / Fire After Working Hours
  - IF YOU SEE FIRE, SMELL SMOKE OR HEAR A FIRE ALARM
  - Immediately call the Fire Department at 911 and/or activate the fire alarm pull station.
  - Call the lobby security console at [REDACTED]
  - Isolate the fire, if possible, by closing the door.
  - If directed to evacuate by the fire department or the Property Management Office, or if unsafe conditions warrant leaving the floor, evacuate DOWN to the next re-entry floor by using the fire exit stairs... never use the elevator!

## Physical Security Annex

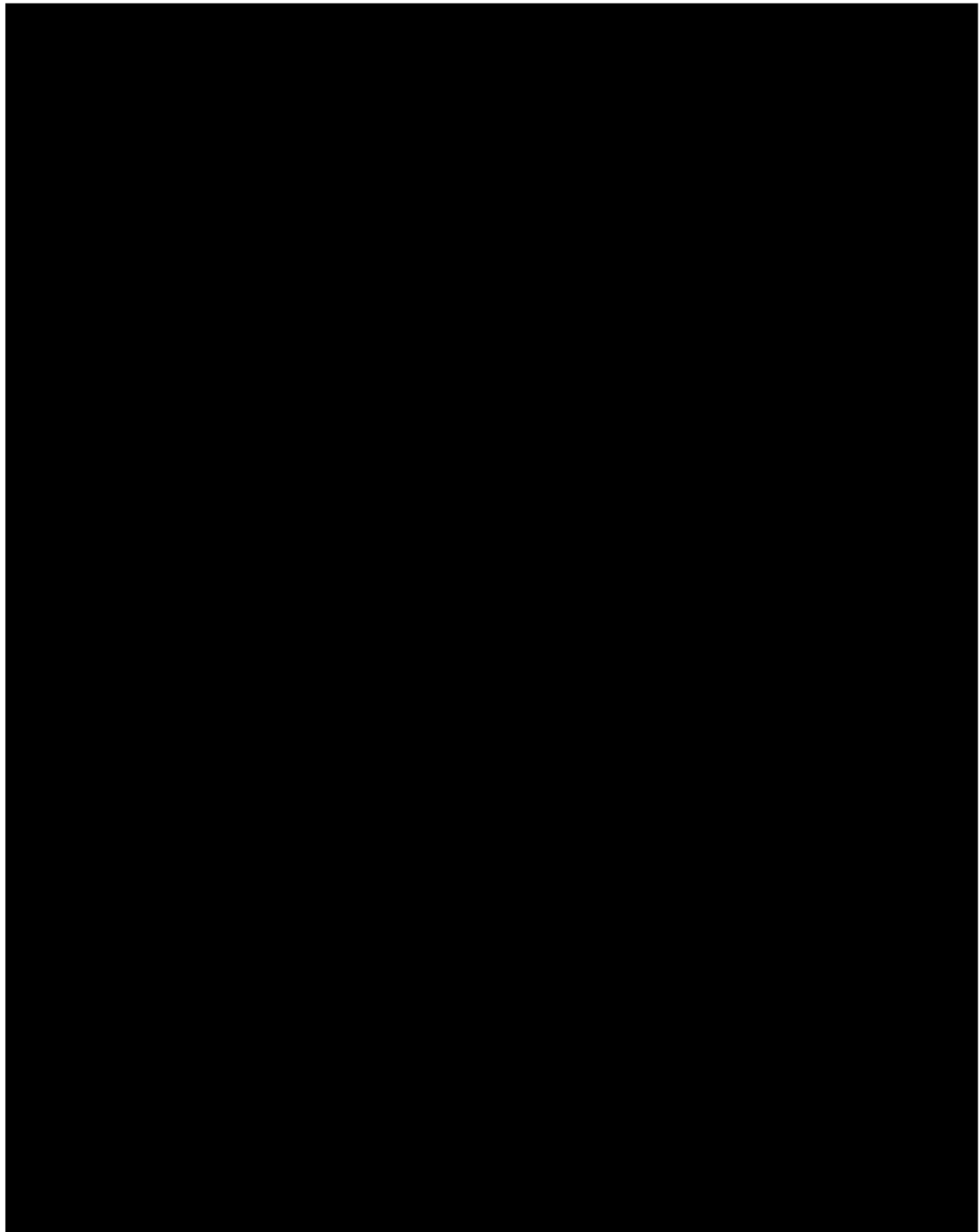
174 Power Global Retail Texas, LLC maintains the physical security of its office facilities by



## Bomb Threat



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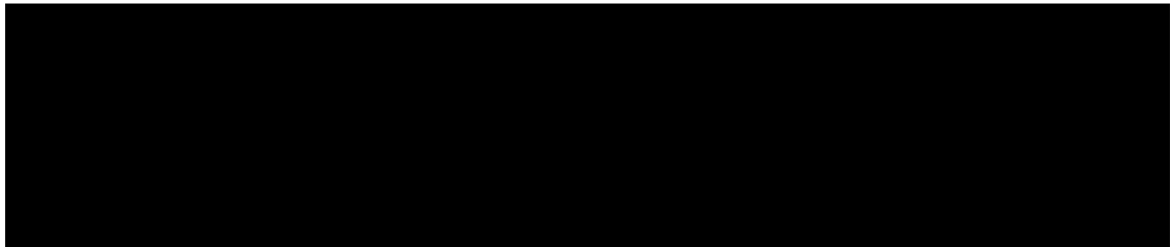


## Civil Disturbance



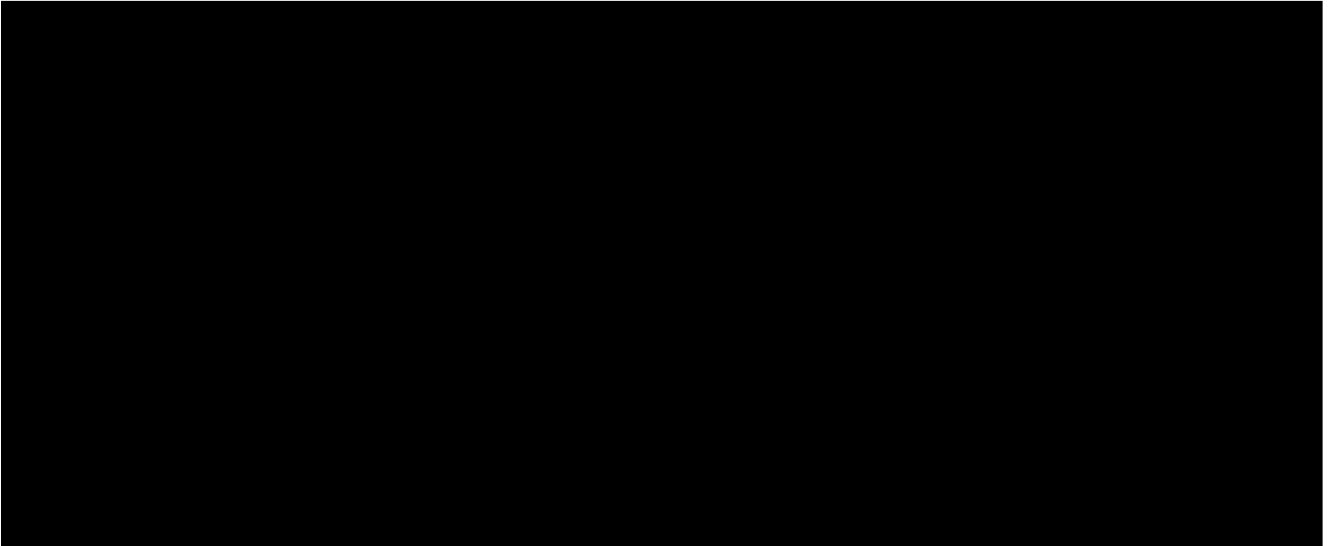
## Natural Disaster

- Tornadoes or Funnel Clouds
  - In most cases advance warning of a tornado is unlikely. For this reason, if a tornado is sighted approaching the building, please notify the Property Management Office and begin moving office staff to the interior corridors and elevator lobbies of the building. One of the greatest dangers will be that of flying glass and objects, so please attempt to select a location that has the maximum number of walls to




## Hurricane Annex

When a hurricane warning and evacuation order has been given by the National Weather Service and Civil Defense Authorities; the Property Management Office will notify all tenants of the closing of the building. Notification will be given by phone and by notices posted in public areas, lobbies, elevators, and entry areas. Tenants not reached by phone will have evacuation



## Pandemic and Epidemic Annex

- In the event of a pandemic or epidemic 174 Power Global Retail Texas, LLC's emergency operations team will monitor state guideline regarding the severity of the disease and convene to determine the plan of action for employees. We will follow all CDC guidelines to minimize the exposure of the disease and associated risk.
- 



## Cyber Security Annex

