

Filing Receipt

Received - 2022-04-11 11:25:26 AM Control Number - 53385 ItemNumber - 11 Emergency Operations Plan of Rita Blanca Electric Cooperative 04/07/2022 Project No. 53385

AFFIDAVIT

STATE OF TEXAS §

COUNTY OF HARTLEY §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath that he or she is entitled to make this Affidavit, and that the statements contained below are based on personal knowledge and are true and correct.

I, Brent Wheeler, swear or affirm the following on behalf of Rita Blanca Electric Cooperative, an electric cooperative operating in the State of Texas:

- a. Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan ("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 have been conducted to the extent required;
- d. The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- e. Cooperative maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- f. Cooperative's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received IS-100, IS-200, IS-700, and in the process of receiving IS-800 National Incident Management System Training.

Brent Wheeler, CEO/General Manager



Sworn to and subscribed before me on this <u>07</u> day of <u>April</u>, 2022

Notary Public in and for the State of Texas

Notary Seal

Executive Summary

This Executive Summary provides an overview of Rita Blanca Electric Cooperative's process for maintaining all aspects of Cooperative's business following 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").

Table 1 provides an overview of the contents and policies included in Cooperatives Emergency Operations Plan ("Plan").

Table 1 Overview of Contents and Policies included in Plan

Policy	Section	Page
APPROVAL AND IMPLEMENTATION	١.	4
ORGANIZATIONAL AND PERSONNEL		
ASSIGNMENTS	.	5
COMMUNICATION PLAN	.	8
EMERGENCY SUPPLIES & ASSISTANCE		
COORDINATION	IV.	11
IDENTIFICATION OF WEATHER-RELATED HAZARDS	V.	16
WEATHER EMERGENCY PROCEDURES	VI.A	18
LOAD SHED PROCEDURES	VI.B	19
PANDEMIC PREPARDNESS PLAN	VI.C	23
WILDFIRE MITIGATION PLAN	VI.D	31
CYBERSECURITY ANNEX	VI.F	33
PHYSICAL SECURITY INCIDENT ANNEX	VI.G	49
RBEC FACILITIES	VI.H	58

[Remainder of Page Intentionally Left Blank]

Table 2 provides an overview of the Plan's compliance with the Rule.

	DESCRIPTION OF		EOP SECTION	EOP
CITATION	REQUIREMENT	APPLICABILITY		PAGE #
25.53(d)(1)(A-E)	APPROVAL AND IMPLEMENTATION SECTION	YES	I	6-7
25.53(d)(2)(A)	COMMUNICATION PLAN FOR ENTITIES WITH TRANSMISSION OR DISTRIBUTION SERVICE	YES	Ш	12-15
25.53(d)(2)(B-D)	COMMUNICATION PLAN FOR GENERATORS, REP AND ERCOT	NO	VII, VIII, IX	49,50, 51
25.53(d)(3)	PLAN TO MAINTAIN PRE- IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE	YES	IV, Appendix C, Appendix D	16-20, 60, 62
25.53(d)(4)	PLAN THAT ADDRESSES STAFFING DURING EMERGENCY RESPONSE	YES	II	8
25.53(d)(5)	A PLAN THAT ADDRESSES HOW AN ENTITY IDENTIFIES WEATHER- RELATED HAZARDS. INCLUDING TORNADOES, HURRICANES, EXTREME COLD WEATHER, EXTREME HOT WEATHER, DROUGHT, AND FLOODING, AND THE PROCESS THE ENTITY FOLLOWS TO ACTIVATE THE EOP	YES	V	23
25.53(e)(1)(A)(i-ii)	WEATHER EMERGENCY ANNEX	YES	VI. A Appendix C, Appendix D, Appendix G	26-27, 60,62, 66
25.53(e)(1)(B)(i-iii)	LOAD SHED ANNEX	YES	VI.B	28-33
25.53(e)(1)(C)	A PANDEMIC AND EPIDEMIC ANNEX	YES	VI.C	34-37
25.53(e)(1)(D)	A WILDFIRE ANNEX	YES	VI.D	43

Table 2 Reference Table

25.53(e)(1)(E)	A HURRICANE ANNEX THAT INCLUDES EVACUATION AND RE-ENTRY PROCEDURES FACILITIES ARE LOCATED WITHIN A HURRICANE EVACUATION ZONE, AS DEFINED BY THE TEXAS DIVISION OF EMERGENCY MANAGEMENT (IDEM);	NO	VI.E	44
25.53(e)(1)(F)	CYBERSECURITY ANNEX	YES	VI.F	45
25.53(e)(1)(G)	PHYSICAL SECURITY INCIDENT ANNEX	YES	VI.G	46
25.53(e)(1)(H)	A TRANSMISSION AND DISTRIBUTION UTILITY THAT LEASES OR OPERATES FACILITIES UNDER PURA §39.918(B)(1) OR PROCURES, OWNS, AND OPERATES FACILITIES UNDER PURA §39.918(B)(2) MUST INCLUDE AN ANNEX THAT DETAILS ITS PLAN FOR THE USE OF THOSE FACILITIES; AND	NO	VI.	47
25.53(e)(1)(I)	RBEC FACILITIES	NO	VI.H	48
25.53(e)(2)(A-H)	REQUIREMENTS FOR GENERATORS	NO	VIII	49
25.53(e)(3)(A-E)	REQUIREMENTS FOR REPS	NO	VIIII	50
25.53(e)(4)(A-F)	REQUIREMENTS FOR ERCOT	NO	IX	51

[Remainder of Page Intentionally Left Blank]

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

NAME	TITLE	DATE OF
		ACCESS OR
		TRAINING
Erik Badillo	IT Supv./Meter Tech	04/07/2022
Ignacio Escareno	Warehouse Clerk	04/07/2022
Raul Gomez	Engineering Clerk	04/07/2022
Anthony Gonzalez	Engineering Clerk	04/07/2022
Brody Howell	Warehouse Clerk	04/07/2022
Tracy Howell	Outside Operations Mgr.	04/07/2022
Mariah Martinez	Member Service Rep.	04/07/2022
Ryan Kennedy	Meter Tech	04/07/2022
Heaven Lucero	Accounting Assistant	04/07/2022
Preston Mead	Engineering Supv.	04/07/2022
Monica Padilla	Member Service Rep.	04/07/2022
Julie Patton	Cashier	04/07/2022
Alejandro Quiroz	Meter Reader	04/07/2022
Desirae Richardson	Engineering Asst.	04/07/2022
Tammy Rinne	Accountant	04/07/2022
Randy Sherrill	Dispatcher	04/07/2022
Dawn Stephens	Billing Supv.	04/07/2022
Grace Subealdea	Inside Operations Mgr.	04/07/2022
Karen Howell	Administrative Asst.	04/07/2022
Brent Wheeler	CEO/General Mgr.	04/07/2022

Table 3 Record of Distribution

Table 4. lists the primary and backup emergency contacts for individuals who can address urgent requests and questions from the PUCT during an emergency.

Table 4 Emergency Contacts

NAME	TITLE	RESPONSIBILITY	CONTACT INFORMATION
Brent Wheeler	President & CEO	Principle administrator of the plan. Must review and approve all changes.	
Tracy Howell	Outside Operations Mgr.	operations	
Preston Mead	Engineering Spv.	operations	



Rita Blanca Electric Cooperative, Inc. 12198 US Hwy 87 PO Box 1947 Dalhart, TX 79022-5947

806.249.4506 office 800.299.4506 office toll-free 806.249.5620 fax thowell@rbec.coop

2022 EOP EXERCISE

On 03/29/2022 RBEC experienced 60+ mile per hour sustained winds for a period of approximately 6 hours requiring RBEC to activate the EOP Annex of Wildfire Mitigation which provided dispatchers the correct phone numbers to notify the agencies of impending dangers and provide response.

At 11:00 A.M. on said date, RBEC participated in a phone conference with the PUC Emergency Management of the PUCT to share ideas and responses for the forthcoming event. **RBEC Employees in Attendance:**

> Grace Subealdea- Inside Operations Manager Tracy Howell- Outside Operations Manager Randy Sherrill- Dispatcher Erik Badillo- IT Supervisor/Meter Tech Karen Howell- Administrative Assistant

Re: Steps taken to prepare for High Wind Event

Rita Blanca Electric Cooperative has decreased the length of our system spans between poles by 1/3. RBEC 's new standard is placing a pole every 200 feet in order to harden our system.

RBEC has also been very active with our pole inspection program to identify and replace any substandard poles.

The RBEC standard procedure is also to stage our crews strategically across our system to be better prepared to respond to outages across the system, as well as deenergize any part of the system as deemed necessary for public protection.

Sincerely,

ang

Tracy Howell **Rita Blanca Electric Cooperative** Inc. Outside Operations Manager thowell@rbec.coop (806)282-6636 cell (806)249-4506 work

Table of Contents

١.	APP	ROVAL AND IMPLEMENTATION	4
II.	ORG	ANIZATIONAL AND PERSONNEL ASSIGMENTS	5
III.	C	OMMUNICATION PLAN	8
	A.	EMPLOYEE COMMUNICATIONS	8
	В.	OUTAGE REPORTING/CONSUMER COMPLAINTS	8
	C.	PUBLIC COMMUNICATIONS	8
	D.	COORINDATION WITH VISITING WORK CREWS	8
	E.	CRITICAL LOADS	8
	F.	REGULATORY COMMUNICATIONS	9
IV.	El	MEGENCY SUPPLIES & ASSITANCE COORDINATION	11
	A.	SECURING ASSISTANCE FROM REGIONAL COOPERATIVES	11
	В.	SECURING ASSISTANCE FROM TEC	11
	C.	COMPLIANCE WITH COOPERATIVE SAFETY RULES AND POLICIES	12
	D.	UNIFORM METHOD OF REIMBURSEMENT	12
	E.	TEC ADDITIONAL COMMENTS	12
	F.	MANAGEMENT ISSUES	13
V.	IDEN	NTIFICATION OF WEATHER RELATED HAZARDS	16
VI.	А	NNEXES	17
	A.	ANNEX A WEATHER EMERGENCIES	.19
	В.	ANNEX B LOAD SHED	.20
	C.	ANNEX C: PANEDEMIC PREPARDNESS PLAN	24
	0	Level 1 – Awareness (seasonal)	.24
	0	Level 2 – Epidemic (preparation)	.24
	0	Level 3 – Pandemic (implementation)	.24
	D.	ANNEX D: WILDFIRE MITGATION PLAN	32
	E.	ANNEX E – HURRICANES	.33
	F.	ANNEX F – CYBERSECURITY	.34
	G.	ANNEX G – PHYSICAL SECURITY INCIDENT	. 51
	Н.	ANNEX H: REQUIREMENTS FOR TRANSMISSION AND DISTRIBUTION UTILITIES	60
	I.	ANNEX: I- RBEC FACILITIES	.61
VII.	R	EQUIREMENTS FOR GENERATORS	101

VIII.	REQUIREMEN	TS FOR RETAIL ELECTRIC PROVIDERS	.101
VII.	ANNEX H REQ	UIREMENTS FOR ERCOT	102
	APPENDIX A.	EMERGENCY CONTACTS	103
	APPENDIX B.	REPORTING TO THE DOE AND PUCT	105
	APPENDIX C.	EMERGENCY SUPPLIES	110
	APPENDIX D.	RESTORATION PERSONNEL SUPPLIES	. 111
	APPENDIX E.	FORM FOR REQUESTING ASSISTANCE	.112
	APPENDIX F.	MEMORANDUM OF UNDERSTANDING	.113

I. APPROVAL AND IMPLEMENTATION

A. INTRODUCTION

Rita Blanca Electric Cooperative maintains this Emergency Operations Plan ("Plan") for use during emergencies, natural disasters or situations involving curtailments or major interruptions in electrical service in compliance with 16 Texas Administrative Code § 25.53 - Electric Service Emergency Operations Plan ("Rule").

This Plan will be reviewed, and an annual drill performed at least once annually if it has not been implemented in response to an actual event within that year. Following any implementation or annual review, Cooperative shall assess the effectiveness of the Plan and modify it as needed. The official copy will be maintained at Cooperative's headquarters located at Rita Blanca Electric Cooperative and a list of modifications is included in Part I.C. below.

B. INDIVIDUALS RESPONSIBLE FOR PLAN

The individuals listed in Table 1 are responsible for maintaining and implementing the Plan and, if designated, have authority to change the Plan:

Table 1 Individual's Responsible for Plan

Name	Title	Responsibility	Authority to Change
Brent Wheeler	President and CEO	Principle	Yes
		administrator of the	
		plan. Must review and	
		approve all changes.	
Tracy Howell	Outside Operations Mgr.	operations	Yes
Preston Mead	Spv. Engineering Services	operations	Yes

C. REVISION AND SUMMARY

This Plan, dated as of 04/07/2022, supersedes all previous versions of the Plan. Please refer to Table 2 for records of revision.

Table 2 Records of Revision			
Revision Date	Section	Summary of Change	Inserted by (name and signature)
04/07/2022		Update Information per	Brent Wheeler
		PUC rulings	

II. ORGANIZATIONAL AND PERSONNEL ASSIGMENTS

The following is not intended as an exhaustive list of all probable or potential responsibilities required in an emergency situation. It does, however, define the essential staffing positions and responsibilities necessary for the management and resolution of unplanned system outages and events.

OPERATIONS SUPERINTENDENT OR SUPERVISOR ON-CALL

- Determines the level of the emergency and has complete responsibility and authority for completing restoration in a timely and efficient manner.
- Full responsibility for coordinating restoration efforts of Level 3 outages. If he is unavailable, the supervisor on-call will fulfill these duties. Both of these positions may be relieved by the director of operations and engineering.
- Insures adequate staffing of Operations Center to provide for the following:
 - Communication and device control
 - Data gathering and analysis
 - Limiting personnel in the Operations Center to critical staff only
 - Critical staff for Level 3 outages will include:
 - System operator
 - ✓ Operations superintendent or supervisor on-call
 - Director of operations and engineering (as needed)
 - ✓ Manager of communications (as needed)
 - IT personnel (as needed)
 - Cooperative staff (as needed)
 - ✓ Other personnel as requested by the operations superintendent
- o Determines proper course of action for the restoration of affected transmission and distribution systems.
- Determines the priority for restoration, switching and patrolling.
- Secures outside contractor assistance if necessary.
- Determines and executes relief schedules during extended service restoration.
- Monitors working time of service and construction personnel so that management can determine appropriate rotation nd relief schedules, insuring safety and minimizing fatigue.
- Direct strategic pre-placement of heavy equipment, dozers, etc.
- Provide periodic updates to manager of communications.

SYSTEM OPERATOR

- Notifies appropriate personnel in the event of an outage.
- o Coordinates and directs activities required to restore the transmission and distribution systems during an outage.
- Maintains control of radio traffic insuring communication access for all field personnel.
- Insures strict adherence to lockout/tagout procedures.
- Insures members on life-support list receive priority status.
- Provides central communication and status information updates to the division managers and manager of communications.
- o Determines extent of service interruptions by member count and by area.

- o Monitors SCADA, outage management and related information systems, and logs all events during the outage.
- Requests support for various information and communication systems as needed.

LINE SUPERINTENDENTS

- Coordinate the logistics and execution of the Emergency Operations Plan by maximizing the available crews, equipment, and material.
- Establish a crew rotation plan when restoration of the system is expected to exceed 16 hours.
- $\circ~$ Meet (as necessary) with the operations superintendent to assist in the development of restoration plans for the following day.
- \circ $\;$ Ensure outside personnel are guided by qualified Cooperative employees.
- Authorized to use direct access to system operations (806)282-6636

DIRECTOR OF OPERATIONS & ENGINEERING; ENGINEERING PERSONNEL

- Ensures all communication links are functional, and notifies appropriate vendors of potential troubleshooting and repair requirements to two-way radios, SCADA links, etc.
- o Provides support to system operations by analyzing outage data and making recommendations for power restoration.
- Constantly monitors location and activity of all Cooperative and contract personnel working on restoration efforts and ensures this information is available to the system operator at all times.
- Inventory damaged lines/equipment and coordinate with supplier to ensure necessary material for repair is available to crews.
- o Log location of all damaged or leaking devices requiring environmental cleanup.
- One field engineer shall remain in the office at all times to coordinate material needs directly to Texas Electric Cooperative ("TEC"). All requests for material, reports of oil leaks, etc., shall be reported through this one engineer.
- Keep appropriate regulatory bodies (municipal governments, Public Utility Commission of Texas ("PUCT"), environmental agencies, etc.) apprised of outage and restoration efforts as per statutory requirement.

STAFF

- o Maintain function of offices with reduced staff during normal business hours.
- Communicate with key account members.
- Coordinate and schedule member service representatives to take outage calls, and ensure designated lead is always present to serve as liaison between system operations and other member service representatives.
- Coordinate the assignment of duties to other employees to ensure any additional needs of the membership, Cooperative or the employees are addressed. Such duties may include:
 - Field inspection to assess damage.
 - Coordination and delivery of materials and meals to crews.
 - Ensure lodging is available for outside crews.
 - Guide out-of-town crews to the damaged areas.
 - Visit members that are on life-support systems if communication system is not working.
 - Transport employees to and from homes or from one crew location to another.

MEMBER SERVICE REPRESENTATIVES

- Provide trained and courteous personnel for answering member outage calls and verifying power restoration to members.
- Assist with the prioritizing of outage calls with regard to special needs or critical loads.
- Provide members with addition information with respect to anticipated outage time and the extent of the damage as supplied by press releases, et al from the manager communication.
- One member service representative will be designated by the appropriate division manager to

serve as liaison between system operations and other member service representatives.

o Confirm restoration of power by follow-up phone call.

CONSTRUCTION, SERVICE AND MAINTENANCE CREWS

- Comply with all safety policies and procedures (e.g. lockout/tagout, grounding, etc.).
- Provides adequate personnel to patrol, repair, sectionalize and/or restore all damaged transmission and distribution systems.
- Coordinate material requirements with engineering to the TEC Utility Supply.
- Periodically review and determine the best utilization of equipment and personnel.
- Request mechanic personnel for emergency equipment and vehicular repair as needed.

DIRECTOR OF COMMUNICATIONS

- Serves as spokesperson for the Cooperative during emergencies.
- Prepares timely news releases, social media updates and public service
- announcements (see Appendix A for emergency contacts),
- Updates the general manager as advised by the operations superintendent.
- o In the event of the director of communication's absence, these duties will be filled by the public relations specialist.
- Ensures member service representatives are provided with periodic updates on the status of the outage, consistent with what is reported in the general media.

MANAGER OF MEMBER SERVICES

- o Complete or arrange for repairs to fleet vehicles in a timely manner to reduce downtime.
- Ensure all portable generators are operational and that any such devices used for communication purposes (backup power supply at Cooperative radio towers) are fueled and ready to run.

III. COMMUNICATION PLAN

A. EMPLOYEE COMMUNICATIONS

Communication with our employees is critical to relaying information such as where to report to work, if we need extra employees on duty, situational updates, etc. Communication tools available as needed include sending emails to Cooperative employees allowing us to reach every full-time and part-time employee.

B. OUTAGE REPORTING/CONSUMER COMPLAINTS

Members can report outages by calling our automated system at Rita Blanca Electric Cooperative (806)249-4506. The system works on caller ID technology. If the member is not calling from a phone number recognized by the system, they can still leave a message to report their outage.

Members can use the Cooperative App to report outages. Once a member is logged in, they can select the "Report an Outage

" icon to submit outage details. They can also request a call back or select the option to receive power out notifications. Members can also dial the office directly at (806)249-4506 Depending on the call volume, all calls may be routed to the automated system.

Member service representatives are called into any of our office to answer calls and process outage reports recorded by the automated system. They visit our Facebook page for updates and information to share with members. Member service representatives work continuously until the outage is restored or until the operations superintendent determines that such services are no longer necessary.

Police, fire and other emergency service organizations are provided with unpublished phone numbers for reaching the Operations Center directly.

Members can file complaints by contacting us privately through the cooperative email <u>rbec@xit.net</u> or dial the office directly at (806)249-4506

C. PUBLIC COMMUNICATIONS

Communication tools include Facebook, along with the Cooperative's website and press releases to TV, radio and newspaper outlets. A Facebook feed is located on the Cooperative's website to connect the information source. The Communications Department is available for interviews as needed. We also have the ability to pull member lists for email and text communications.

D. COORINDATION WITH VISITING WORK CREWS

Differences in radio frequencies combined with unfamiliarity with our transmission/distribution system make it imperative that all visiting work crews be accompanied by a qualified employee from the Cooperative during their work activities.

E. CRITICAL LOADS

The Cooperative will attempt to notify critical loads either before or at the onset of an emergency by any of the following methods: phone, texting, email, radio, television, social media, Cooperative's website, law enforcement officers, other important contacts and utility personnel in the field.

F. REGULATORY COMMUNICATIONS

The Director of Risk Management shall insure the timely filing of reports in the event that a system failure or load loss meets the reporting threshold of state and federal regulatory bodies.

1. Procedure for Outage Reporting to DOE

The Form OE-417 is the critical alert mechanism for informing DOE of electrical emergency incidents or disturbances that disrupt the operation of any critical infrastructure in the electric power industry.

Instructions for filing as well as a link to the on-line form are located at: http://www.eia.gov/survey/form/oe_417/instructions.pdf

Form OE-417 must be submitted to the Operations Center if one of the following apply:

- 1. Physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations.
- 2. Cyber event that causes interruptions of electrical system operations.
- 3. Complete operational failure or shut-down of the transmission and/or distribution electrical system.
- Electrical system Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system.
- 5. Uncontrolled loss of 300 Megawatts (MW) or more of firm system loads for more than 15 minutes from a single incident
- 6. Load shedding of 100 MW or more implemented under emergency operational policy
- 7. System-wide voltage reductions of 3 percent or more.

the elect hubio and the post of the transformation of transformati

(INSERT PHONE NUMBER) if the incident or disturbance is having a critical impact on the operations. An initial report must still be filed as soon as possible. A follow-up report is due within 48 hours of the time of the system disruption.

Instructions and forms for reporting to both the PUCT and the Department of Energy ("DOE") are located in Appendix B

2. Public Utility Commission of Texas

Upon request by Commission staff during an activation of the State Operations Center (SOC) by the Texas Department of Emergency Management (TDEM), the Cooperative will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by Commission staff.

3. Office of Public Utility Counsel (OPUC)

Upon request by OPUC during an activation of the SOC by the TDEM, the Cooperative will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by Commission staff.

IV. EMEGENCY SUPPLIES & ASSITANCE COORDINATION

Cooperative maintains 1/3 of the number of poles, conductors, associated hardware and other supplies readily available on site to restore power after an emergency before permanent work commences.

Additionally, as described below Cooperative has access to mutual aid in in the event it needs access to additional supplies and work crews in an emergency.

Please refer to Appendix C: Emergency Supplies for a list of emergency supplies to be maintained at Cooperative sites and Appendix D: Restoration Crew Supplies for a list of emergency supplies for restoration personnel.

A. SECURING ASSISTANCE FROM REGIONAL COOPERATIVES

Cooperative has a Memorandum of Understanding ("MOU") in place between 17 adjacent distribution cooperatives plus Golden Spread Electric Cooperative ("GSEC") for emergencies that can be coordinated within the MOU participants.

During an emergency Cooperative will survey the extent of damage and determine as nearly as possible the outside personnel and equipment needed. If MOU participants are not able to respond to needs, contact Texas Electric Cooperatives to secure additional assistance. Please refer to Appendix F for a description of the MOU.

B. SECURING ASSISTANCE FROM TEC

For larger widespread emergency events where multiple members of the MOU need assistance that cannot be obtained within the MOU participants, Cooperative will request mutual aid assistance according to the plan developed by Texas Electric Cooperatives through their Loss Control & Safety Program.

Cooperative will survey the extent of damage and determine as nearly as possible the outside personnel and equipment needed. Cooperative staff will contact Martin Bevins, VP Communications & Member Services (512-486-6249 Office---(512) 584-7758 Cell) and advise of your needs.

Other contacts at TEC include: Mike Williams, 512-486-6203 Office---(512) 789-6210 Cell Julia Harvey, 512-486-6220 Office---(512) 789-3349 Cell Johnny Andrews, 512-763-3330 Office---(512) 426-1567 Cell Danny Williams, 512-413-0509 (Office)--- When calling for assistance, give the following information:

- Nature of emergency
- Number and type of trucks needed
- Other equipment and tools needed
- Personnel and classification needed
- Materials needed
- Weather and road conditions
- Where the crews should report, and to whom
- How to contact your cooperative
- Name of person to receive this information
- Telephone numbers other than normal usage

To facilitate giving of above information over substandard communications media, or when the message must be relayed through persons unfamiliar with the terms, use the Form For Requesting Assistance (see Appendix E).

C. COMPLIANCE WITH COOPERATIVE SAFETY RULES AND POLICIES

All Cooperative personnel, contractors, cooperative crews providing mutual aid, etc. shall be required to comply with all safety rules and policies of the Cooperative. Such rules and policies include, but are not limited to, all provisions of the Cooperative's current safety handbook, OSHA 29CFR 1910.269, NESC, etc.

D. UNIFORM METHOD OF REIMBURSEMENT

It is suggested that cooperatives requesting assistance will reimburse the providers of the assistance the provider's actual labor, equipment and materials costs. It is suggested that the rate of pay for labor is at least time-and-a-half for all hours worked.

Every reasonable precaution shall be used to determine whether an employee is mentally and physically qualified to follow safe work practices. The crew foreman of the cooperative providing the assistance will determine the total number of continuous work hours. It is also recommended that the current FEMA Cost Code listing be considered.

E. TEC ADDITIONAL COMMENTS

- The Texas Electric Cooperatives Loss Control Advisory Committee hereby recognizes the need to update and amend this manual, preferably on an annual basis. This document should certainly be reviewed shortly after a disaster event has occurred in the state, and which has affected any TEC member-system cooperative. Additional recommendations and suggestions will be added as necessary, and will serve as additional attachments or amendments to this text.
- 2. It is further recommended that the TEC Loss Control Advisory Committee, along with the TEC Directors, review and update the TEC Mutual Aid Plan for the Electric Cooperatives of Texas on an annual basis. Such review should include:

1) an update of names, addresses and phone numbers (to include emergency contact phone numbers) of all in-house contractors used by cooperatives in the state; 2) an updated listing of the current safety practices, rules, and regulations as adopted by the TEC Safety and Loss Control Advisory Committee and the TEC Board of Directors, including any amendments thereto; 3) an annual study of wages paid to assisting co-op personnel, to include an analysis

of wages paid to assisting line crews from other surrounding states; and, 4) a review of billing rates for equipment and vehicles used during emergency restoration services and in subsequent permanent repair efforts during the days and weeks following a declared disaster.

- 3. It is strongly recommended that an inventory of materials be commenced by the assisting cooperative for all vehicles and equipment to be used during the emergency restoration period, and that such an inventory be conducted before vehicles are sent to an affected cooperative, and after work has been completed.
- 4. The assisted cooperative may either return the borrowed materials OR reimburse the assisting cooperative for materials replacement.
- TEC should appoint a designated person from its staff to serve as an official liaison to both Texas Emergency Management (TEM) and the Federal Emergency Management Agency (FEMA).
- 6. Such liaison should work with officials from TEM and FEMA before, during, and after all declared disasters within the state of Texas. Additionally, said TEC liaison should stress the importance of applicable Codes and Standards that all Texas electric cooperatives are required by law to abide by and to apply such Codes and Standards during the Emergency Protective Measures period and during permanent repair efforts.
- 7. The Committee hereby recommends that TEM officials be trained in the knowledge of applicable electric Codes and Standards, (specifically the current version of the National Electrical Safety Code (NESC).
- 8. The Committee further recommends that FEMA auditors be consistent in both personnel and their findings among audited cooperatives.
- The Committee suggests that TEC contract with, or arrange for, TEM officials to conduct an annual training seminar for cooperative personnel on disaster-related topics, including but not limited to: Public Assistance, Response and Recovery, Disaster-related Mitigation, and Hazard Mitigation.
- 10. Finally, the Committee recommends that, within 60 to 90 days following a disaster-related event, an in-depth analysis of the response and recovery effort by affected cooperatives be conducted in order to make necessary improvements, changes or corrections to the TEC Mutual Aid Plan and to this disaster response and recovery guidebook. Mutual Aid Agreement Participants (Texas Only).

F. MANAGEMENT ISSUES

- Mutual Aid Agreements between cooperatives and/or other organizations should be reviewed annually. Such agreements should specify the type of assistance each participant shall provide, and at what cost. The Mutual Aid Agreement should stipulate that the "helping partner," the participant responding to a request for help from the affected system, shall bill all costs at their normal rates; any "adders" should be specified and detailed in the agreement.
- 2. "Projects of Work," or "PWs," should specify verifiable quantities of work to be done whenever possible. Cooperative personnel must be prepared to explain cost over-runs or reasons for higher costs than were estimated in the original PW. Each state's Emergency Management Agency should be contacted immediately if an over-run is anticipated. Such constant tracking of a PW's progress may necessitate the use of a full-time accounting manager or project accountant for FEMA-related work. Such assignment would be added to the cooperative's "Administrative Costs" for the project.
- 3. Consider the assignment or designation of someone to be the cooperative Project Officer throughout the course of the disaster response and recovery. Such person could be from within the cooperative, or on loan from another system outside the disaster area. The Project Officer's duties could include the following:

- a. Assistance in evaluating and estimating the extent of damage to the cooperative's system;
- Assistance in securing available contractors and bid lists once the 70-hour Emergency Protective Measures period has passed;
- c. Coordinating with all other cooperative departments, including but not limited to management, accounting, engineering, operations, purchasing, and warehouse operations, to ensure an orderly assessment of needs by each department, and assistance in helping individual departments meet necessary requirements during the disaster response and recovery process. Such requirements would include ensuring environmental compliance via contacts with each state 's Department of Environmental Quality (DEQ), One-call digging notification, State Historic Preservation offices and each state's Archeological Survey notification, as well as each state's Floodplain Administrator office notification.
- d. The Cooperative Project Officer could also coordinate the establishment of temporary storage areas for debris, and assist in dispensing state emergency management Environmental Release Forms and Historic Site Preservation Forms to individuals or groups who contact the cooperative regarding the re-use of damaged or destroyed wood poles)
- e. Other duties possibly assigned to the Cooperative Project Officer would be the evaluation of material acquisition, material ospensation, compliation of staking sheets during both the Emergency Protective Measures period and the Utilities (permanent repairs) period, and ensuring that all

required maps, invoices, time sheets, and other paperwork documentation relevant to the specified disaster be collected and retained in an orderly fashion for future review by FEMA and OIG.

4. Spend percant Belefing the accounting up of of assistance as soon as in a second transformed and a second transformation of the account of the second transformation of transformati

PWs or delay reimbursements.

- 5. Management may wish to implement a policy that designates key employees and supervisors be available 24-hours per day, 7 days per week during the disaster, with work schedules to be determined by department heads in conjunction with the manager/CEO.
- 6. Communications, marketing, and/or public relations personnel may be utilized or designated to deliver material, equipment, and/or food (meals) to crews in the field, depending upon the personnel's knowledge of the distribution system and their certification on equipment or in materials handling.
- 7. As soon as possible, preferably during the first 70 hours of the disaster (FEMA's usual definition of Category B, Emergency Protective Measures), contact in-house contractors and those whose bids have been accepted and determine the length of time the contractors' emergency rates are to be in effect. Do not accept a contractor's argument that FEMA will automatically pay for extended work periods utilizing emergency rates. Also, unless other arrangements are made, advise contractors that after the initial 70-hour Emergency Protective Measures period, meals

and lodging will no longer be paid for by the cooperative, but should be arranged and paid for by the contractor, with copies of meal and hotel receipts to be attached to weekly invoices supplied to the cooperative. Said meal and hotel tickets should list the names of crew members and corresponding room numbers at hotels to account for appropriate meal and lodging expenses. (Reference current IRS per diem guidelines.)

- 8. It is strongly recommended that additional engineering resources be arranged to assist in the daily development of staking sheets, material sheets, and work order information. This will allow the staking department to stay ahead of construction crews and provide for a more orderly flow of necessary and vital information to other key departments.
- 9. The engineering department should begin solicitation of at least three (3) bids from contractors as soon as possible, even before the full extent of damage to the system has

been determined. Both FEMA and the OIG require that bids

be procured for all permanent restoration work to be done be contractors. Make sure that any 'verbal contracts' are converted to written agreements to be shown to auditors.

- 10. Whenever it appears that consumers may be without electric power for several days or weeks, consider hiring security guards to be in place at office headquarters and warehouse facilities. This generally eliminates the possibility of hostile issues with consumers and sends a message that personnel, material, and equipment are being safeguarded. Once the cooperative nears completion of its service restoration efforts to residential members, the security arrangement may then be terminated.
- 11. It is not uncommon for employees to retire, quit, or ask for re-assignment during or following a disaster. Carefully evaluate the need for cooperative linemen to work at night; their most effective work and/or leadership will most likely be during daylight hours, when damage to the system is clearly visible and when they have been adequately rested.
- 12. Document the first day of the outage and the day the last consumer's service was restored. This may impact various FEMA Categories A through F on your co-op's Force Account Labor statistics.
- 13. Have an Organization Chart of all cooperative employees, indicating what area or department they worked in before and during the disaster. This will help resolve questions about force account labor when it is classified into Categories A, Debris Removal; B, Emergency Protective Measures; and F, Utilities (Permanent Repairs).
- 14. Consider the development of a Rest and Recuperation Policy (R & R) for employees. Such policy should be designed for the safety and well-being of the cooperative's employees, and for the general public. The policy should be developed by management, and approved/adopted by the co-op's board of trustees. If such a policy is enacted during the disaster, the date and time should be noted in the form of a written memorandum.
- 15. Insurance claims filed with FEMA should have a disclaimer from the cooperative's insurance carrier. Have copies of all insurance policies available for inspection by state emergency management, FEMA, and OIG personnel.
- 16. Insist that daily time sheet entries be made by all personnel, listing hours worked, names of crew members, and location work was performed; document, with narrative descriptions, any work performed by office personnel if it is related to field work, i.e., delivery of meals or materials and equipment, warehouse work, etc.
- 17. Management should be prepared to explain the process that the cooperative used to select work crews, whether such crews were from other co-ops or were contract crews. Explanation of the cooperative's action plan and methodology used in selecting various contractors may be necessary, including lists of equipment needed and rationale used to determine which contractors and crews would be utilized.
- 18. Send groups of employees to state emergency management agency and FEMA training; this denotes the co-op's dedication to being properly prepared.

V. IDENTIFICATION OF WEATHER RELATED HAZARDS

Cooperative operations personnel will monitor weather conditions, county emergency management alerts and applicable state agency advisories regarding severe weather events and conditions. Operations personnel will also participate in applicable State Operations Center (SOC) and Texas Energy Reliability Council (TERC) calls prior to and during weather and wildfire events. Cooperative's wildfire plan is addressed in greater detail in Section VI.D.

The following stages describe the various levels of preparedness in advance of, or during an outage situation.

PRE-STORM WATCH

- This is a precautionary level preceding the arrival of an anticipated severe weather event. This
 level would be activated following a severe weather forecast. The system operator will monitor
 the situation and advise the superintendent on- call. The system operator and/or
 superintendent may request assistance in answering phones (e.g. member service
 representatives, etc.).
 - o Expected outage time: None
 - o Scope of outage: No members out of service
 - o Initiated by: System operations or superintendent on-call

• <u>LEVEL 1</u>

- Service likely to be restored in less than four hours. Typically handled by on-call service personnel, however supervisor or superintendent on-call may direct other personnel to assist as needed.
 - o Expected outage time: Less than 4 hours
 - o Scope of outage: Less than 100 members
 - o Initiated by: System operations or superintendent on-call

<u>LEVEL 2</u>

• Service likely to be restored in less than 12 hours without the assistance of outside crews. All construction, operations and service personnel to report.

- o Expected outage time: 4 to 12 hours
- o Scope of outage: Entire substation or major feeder
- o Initiated by: Director of operations & engineering or general manager

<u>LEVEL 3</u>

- Requires outside help to restore service. All Cooperative employees must report.
 - o Expected outage time: More than 12 hours
 - o Scope of outage: Widespread damage to system
 - o Initiated by: Director of operations & engineering or general manager
 - o Operations superintendent to have full
 - responsibility for coordinating restoration

activities

VI. ANNEXES

Rita Blanca Electric maintains the annexes designated below, which are attached and incorporated into the Plan:

Annex	Title	Included	Explanation, if not included
A	Weather Emergencies	Yes	
В	Load Shed	Yes	
С	Pandemic and Epidemic	Yes	
D	Wildfires	Yes	
E	Hurricanes	No	Not applicable. Cooperative service territory is not located near or within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management.
F	Cybersecurity	Yes	
G	Physical Security	Yes	
Н	TDU Requirements	No	Not Applicable. Cooperative is not a Transmission and Distribution Utility as defined in 16 TAC §25.5
1	Additional annexes	No	Rita Blanca Facilities

A. ANNEX A WEATHER EMERGENCIES

Please refer to Section II: Organizational and Personnel Assignments for a description of personnel duties during an emergency, and Section V: Identification of Weather-Related Hazards for Cooperative's process for identifying weather related hazards.

Please also refer to the following procedures:

- Appendix C: Emergency Office Supplies provides a list of emergency supplies maintained at Cooperative sites.
- Appendix: D: Restoration Crew Supplies provides a list of emergency supplies maintained on-site for restoration crews.
- Appendix G: Engineering and Operations provides engineering and operations emergency.

Rita Blanca Electric Cooperative owns no assets that are temperature sensitive. Rita Blanca EC's primary concern during a weather emergency is the safety of personnel. All operational employees are trained annually by Texas Electric Cooperative loss control instructors. Rita Blanca EC employee training includes but is not limited to heat stress, heat stroke, hypothermia, and frostbite. Training includes prevention as well as first aid practices.

Rita Blanca EC will provide meals, lodging and other related services as needed for mutual aid parties involved in a weather emergency. Dietary needs will be observed.

The CEO is responsible for determining if additional personnel is needed in the event of an emergency. Purchasing agent's responsibility includes ensuring delivery of adequate materials and supplies for repairs to the system. A list of contact information for all supplies is included in the Emergency Operations Plan.

B. ANNEX B LOAD SHED

I. CONFIDENTIAL REGISTRY OF CRITICAL LOAD AND CRITICAL CARE CUSTOMERS

Cooperative maintains a registry of both critical care and critical load members; however, it is the responsibility of the member to inform the Cooperative of special medical needs. The Cooperative attempts to identify such members by asking at the time of establishing a new account whether any person residing at this new account location requires an electric-powered medical device to sustain life. Further, the Cooperative publishes reminders in the Texas Co-op Power magazine, newsletters and notices included with bills that the Cooperative needs to be informed of any special needs.

No less than twice a year, the Cooperative also provides load shed information with customer bills that addresses the procedures for implementing voluntary load shedding; the types of Member consumers who may be considered critical load or critical care and the application process to be designated as such; and information about reducing electricity use at times when involuntary load shedding events may be implemented.

The registry is confidential and is accessible through the Accounting System at all times for use by operations personnel. The list identifies each member by location number and is cross-referenced on outage reports. These members are contacted before any planned service interruption by Cooperative personnel.

Methods to communicate with these members during emergencies when telephone service is not available include working through local law enforcement officers and emergency medical personnel in the field. Where possible, field visits by Cooperative personnel may also be used.

The registry is updated continuously, as necessary.

II. ROTATING OUTAGES

Cooperative will attempt to inform members in advance of planned outages, however, during emergencies, outages may need to be rotated to maintain system integrity.

NOTE: Because the curtailment and shedding load is dependent on several factors (most significantly, the amount of load that needs to be curtailed), the System Operator may have discretion in determining where load shedding will best serve the interest of the cooperative.

1. Southwest Power Pool ("SPP")

I. PROCEDURES FOR CONTROLLED SHEDDING OF LOAD

Southwestern Public Service's ("SPS") Transmission Operations Center receives Load Shed Instructions from SPP. SPS's Transmission Operations Center performs a calculation to allocate the load shed requirement for "Rita Blanca Electric Cooperative" and communicates that instruction via voice communication.

Upon notification of curtailment and the target kW to be shed, "Rita Blanca Electric Cooperative" personnel will begin opening feeder circuit breakers via SCADA (or via field personnel in the substation) as outlined in the cooperative's Emergency Load Curtailment Plan until the target kW is shed.

Once the target kW is shed, "Rita Blanca Electric Cooperative" will notify SPS's Transmission Operations Center via voice communication that the allocated load has been shed.

Depending on the duration of the curtailment, it is planned to rotate load that has been shed among the substations and circuits until the directive is cancelled. This is to spread the outages as evenly among the Members as possible and minimize the inconvenience associated with the outage.

All load shed Instructions will be executed as soon as possible and without delay.

The cooperative uses discretion in prioritization of selecting load shed feeders by giving highest priority to critical natural gas facilities to remain in service, with other critical loads given lower priority to remain in service. Even though the cooperative plan attempts to prioritize critical natural gas facilities and other critical loads from manual load shed, designation as a critical natural gas facility or other critical load does not guarantee the uninterrupted supply of electricity.

Cooperative uses the following guide to curtail power to the categories listed below in sequential order

- 1. Dairy facilities
- 2. Cattle Feedyards

II. PRIORITIES FOR RESTORING SHED LOAD TO SERVICE

Southwestern Public Service's Transmission Operations Center receives Instructions from SPP that load can be restored. SPS's Transmission Operations Center performs a calculation to allocate how much load can be restored for "Rita Blanca Electric Cooperative" and communicates that Instruction via voice communication.

Upon notification of load restoration and the target kW to be restored, "Rita Blanca Electric Cooperative" personnel will begin closing feeder circuit breakers via SCADA (or via field personnel in the substation) until the target kW is restored.

Once the target kW is restored, "Rita Blanca Electric Cooperative" will notify SPS's Transmission Operations Center via voice communication the amount of load that has been restored.

If any critical natural gas facilities or other critical loads were curtailed in step (i), they will be given higher priority for service restoration in the reverse order listed in Section 2.1 above.

In addition to the priorities concerning community health and safety, Cooperative will assign crews to specific areas. Generally, the crews will concentrate on a given line section in order to restore power to as many members as possible. Restoration will be done systematically, with the best interest of all affected members in mind. However, one or more crews may be assigned to locations where special hazards exist or where especially critical loads require immediate attention. When not specifically assigned, these crews will be used to repair individual services

III. PROCEDURE FOR MAINTAINING ACCURATE REGISTRY OF CRITICAL LOAD CUSTOMERS

Cooperative maintains a registry of both critical care and critical load Members, however, it is the responsibility of the member to inform the Cooperative of special medical needs. The Cooperative attempts to identify such members by asking at the time of establishing a new account whether any person residing at this new account location requires an electric-powered medical device to sustain life. Further, the Cooperative publishes reminders in the Texas Co-op Power magazine, newsletters and notices included with bills that the Cooperative needs to be informed of any special needs.

No less than twice a year, the Cooperative also provides load shed information with customer bills that addresses the procedures for implementing voluntary load shedding; the types of Member consumers who may be considered critical load or critical care and the application process to be designated as such; and information about reducing electricity use at times when involuntary load shedding events may be implemented.

The registry is confidential and is accessible through the Accounting System at all times for use by operations personnel. The list identifies each member by location number and is cross-referenced on outage reports. These members are contacted before any planned service interruption by Cooperative personnel.

Methods to communicate with these members during emergencies when telephone service is not available include working through local law enforcement officers and emergency medical personnel in the field. Where possible, field visits by Cooperative personnel may also be used.

The registry is updated continuously as necessary.

IV. ROTATING OUTAGES

Cooperative will attempt to inform members in advance of planned outages, however, during emergencies, outages may need to be rotated to maintain system integrity.

NOTE: Because the curtailment and shedding load is dependent on several factors (most significantly, the amount of load that needs to be curtailed), the System Operator may have discretion in determining where load shedding will best serve the interest of the cooperative.

C. ANNEX C: PANEDEMIC PREPARDNESS PLAN

1. Objectives of the Plan

To prepare the Cooperative for the possibility of a pandemic by:

- 1. Educating employees about a possible pandemic event and the potential impacts on the Cooperatives' business operations;
- 2. Implementing reasonable measures to mitigate the impact of a pandemic on the Cooperative and its employees;
- 3. Developing plans and policies for responding to a pandemic; and
- 4. Promoting employee wellness and minimizing opportunities for employees to be exposed to the disease while at the Cooperative.

2. Background

A pandemic is a global disease outbreak occurring when a virus emerges for which people have little or no immunity and for which there is no vaccine. The disease spreads person- to-person, causes serious illness, and can sweep across the country and *around the world in very short time*.

It is difficult to predict when the next pandemic will occur or how severe it will be. Wherever and whenever a pandemic starts, everyone around the world is at risk. Countries might, through measures such as border closures and travel restrictions, delay arrival of the virus, but cannot stop it.

As of this writing, health professionals are concerned about the potential spread of a highly pathogenic virus.

3. Levels of Response

Because the nature of a pandemic cannot be determined in advance, this plan addresses the threat with three general levels of response: **Awareness**, **Epidemic** and **Pandemic**. These levels are defined as follows:



Level 1 – Awareness (seasonal)

The virus is reported affecting 5-10% of the population within the State of Texas.

Level 2 – Epidemic (preparation)

 A widespread outbreak affecting 10-20% of the population. An epidemic may be declared by the Centers for Disease Control (CDC) or the Texas Health and Human Services Commission (HHSC).

- Level 3 Pandemic (implementation)
- A widespread outbreak affecting 20+% of the population. A pandemic may be declared by the CDC and/or the World Health Organization (WHO).

4. Preparation & Response Efforts

I. EMPLOYEE EDUCATION

Employees will be educated about the virus, how it spreads and how the Cooperative is responding.

Numerous educational resources are available from the WHO and the CDC. Employee luncheons, company intranet, posters and broadcast e-mail may be used to convey this information to employees.

Existing communication tools and communications plans would be used to educate and communicate pandemic- related messages to employees.

Level 1	 How to avoid the virus Preventing the spread of the virus Symptoms of virus Do not report to work if sick Do not return to work until all symptoms have cleared. Full duty release is required to return to work with no restrictions/limitations (provide specific guidance from public heath correlations)
Level 2	 Limit face-to-face meetings Limit travel to affected areas Communicate changes in policy and/or practices
Level 3	Suspend face-to-face meetingsSuspend non-critical business travel

II. FLU SHOTS

Employees will be encouraged – and given an opportunity – to receive the flu vaccine.

III. SANITARY PRACTICES

Supplies to maintain a sanitary environment will be kept on hand and deployed, as necessary, including:

- 1 Hand Sanitizer
- 2 Disinfectant Spray
- 3 Rubber Gloves
- 4 Masks

Level 1	 Alcohol-based hand sanitizer in all areas (restrooms, break rooms, conference rooms, and at all meetings where food and drink are served) Disinfectant spray (e.g. Lysol) in all restrooms Facial tissues (e.g. Kleenex) in all meeting rooms and break rooms Brief cleaning crews on disinfecting techniques
Level 2	 No additional measures unless directed by the CDC or Texas HHSC
Level 3	 No additional measures unless directed by the CDC or Texas HHSC

IV. POLICY MODIFICATION/DEVELOPMENT

Policies related to sick leave will be reviewed with possible impacts from a pandemic in mind. The following issues will be among those considered:

- 1. A possible relaxing of sick leave policy during a Level 2 or 3.
 - The possibility of mandatory leave for employees with symptoms of illness
 - 3. A set of return-to-work guidelines to prevent employees from returning while still contagious
 - 4. Some guidance on the handling of missed time for employees that do not wish to come to work for fear of exposure
 - 5. Guidelines to identify positions that would qualify for work-from-home (WFH)
 - 6. Identification, by department, of potential WFH employees

Level 1	Normal leave policies
Level 2	 WFH permitted (with supervisor approval)
Level 3	 WFH encouraged (with supervisor approval) Relaxation of sick leave and other relevant policies

V. BUSINESS CONTINUITY

Managers will be asked to re-examine their critical functions at a Level 1 situation. Specifically:

- 1. Are employees within the department cross-trained in job functions related to critical processes?
- 2. Could the department continue to perform its critical process with a 40-50% employee absentee rate?
- 3. Which of the employees are equipped to work from home? (computer internet access, VPN)

The IT Department will develop plans for a wide deployment of software and services during a Level 1 situation to support a large number of WFH employees. IT will also provide instruction on the use of the Cooperative e-mail system and other necessary programs and services from a remote location.

VI. COORDINATION/MONITORING

The Cooperative's Director of Risk Management will monitor information from the CDC and Texas HHSC for notification of activity. This should provide adequate lead time to prepare for arrival of the pandemic.

A significant increase in the level of contagious disease activity would be reported to the General Manager and executive staff, who would then be responsible for determining if specific action related to the activation of a Level 2 or Level 3 response is required.

5. Protocols

Sick Leave				
Level 1	 Employees should not report for work if they show symptoms Employees should not report for work if a family member within the same household shows symptoms Employees should not return to work from an illness- related absence until they are symptom-free; a doctor's release is required 			
Level 2	 Supervisors encouraged to send sick individuals home 			
Level 3	 Consider modifications to sick leave and other relevant policies 			
Business Travel				

Level 1	 No changes 			
Level 2	 Employees should be cautioned concerning travel 			
Level 3	 Non-critical business travel suspended 			
	Meetings			
Level 1	 No changes 			
Level 2	 Face-to-face meetings should be minimized 			
Level 3	 Face-to-face meetings suspended 			
Work from Home				
Level 1	 No changes 			
Level 2	 Employees approved for WFH would be allowed to do so 			
Level 3	 Employees approved for WFH would be encouraged to do so WFH employees would be expected to put in a normal work week and be available during normal business hours 			
<u>Preparation</u>				
Identify potential WFH employees Job function can be performed remotely Employee has Internet access at home Employee has a home PC or company-issued laptop Train WFH employees on remote access to e-mail Install VPN software and train employees in its use Cross-train employees on critical business processes				
Update restoration plans to address potential for 50% absenteeism				

When	Who	What	
Level 1	Risk Management	 Initiate review of pandemic plan and recommend changes, as needed 	
Level 1	Executive Staff	 Develop and consider communications plan to educate employees about pandemic preparation efforts Identify critical business process plans Assess the need to purchase food or water 	

Level 1	Human Resources and Risk Management	 HR will prepare information to distribute to employees such as business cards with contact information for wallets and electronic email/phone notifications HR and Risk Management will educate employees on pandemic plan
Level 1	Information Technology	 Review configuration of remote access system and communicate any changes to employees Provide remote access training for potential WFH employees
Level 1	Risk Management	 Stock all restrooms and meeting rooms with hand sanitizer, and disinfectant spray Place placards and posters conveying prevention messages in all restrooms and meeting rooms
Level 2 or 3	Risk Management initiates	 Situational review with General Manager and staff If recommended by the CDC or Texas HHSC, medical screening of employees and/or public will be implemented to reduce potential exposure to infected individuals HR will implement the medical screening process as recommended Risk Management will provide kits for persons performing medical screening. The contents of the kits will follow the recommendation of health professionals. Information Technology will put into place door lock procedures for medical screening, virus lockdown, and initiate call center for employees to report illness.

		 Medical Door screening for employees, contractors or any persons that will be conducting business at a local office will be conducted as follows: NDO lobby SDO lobby Spur office lobby Childress office lobby
Level 2 or 3	Director of Communications	 Director of Communications will provide status updates as they become necessary regarding the crisis.
		 Changes in business operations will be communicated through Director of Communications to our members.
Level 2 or 3	Risk Management	 Prepare contact information for virus cleanup in the event it becomes necessary. This will be based on recommendations by the CDC or Texas HHSC.
		 Prepare signs in the event of lockdown for all doors and place in company vehicles at various locations. This will be based on recommendations by the CDC or
		Texas HHSC.
--------------	--	---
Level 2 or 3	Information Technology	 Provide remote access for WFH employees
Level 2 or 3	HumanResources, Risk Management, and Engineering Manager	 Will communicate with employees and contractors regarding the potential pandemic preparation efforts.

I. OFFICE OPERATIONS

If a pandemic occurs all office operations will continue until it is determined that employees are at risk. Public access to the property may be denied pursuant to a determination by the General Manager.

The General Manager shall determine what alternatives will be carried out for essential business operations. Possible scenarios include:

Cashier

- 1. Employee will be required to wear proper PPE.
- 2. Limit access to drive through traffic only; no public access to facility.
- 3. Accept payments via electronic transmittance.
- 4. Employee may work from home.

Member Service Representatives

- 1. Employee will be required to wear proper PPE.
- 2. Accepting applications/payments for service via electronic transmittance.
- 3. Employee may work from home.

Other Office Services

- 1. Employee will be required to wear proper PPE.
- 2. Employee may work from home.

II. FIELD OPERATIONS

If a pandemic occurs all field operations will continue until it is determined that employees are at risk. The General Manager may limit or prohibit public access to Cooperative property.

The General Manager and executive staff will determine what alternatives will be carried out for essential business operations, however possible. Possible scenarios include:

- 1. Limited one-on-one exposure to members and public.
- 2. Use of PPE.
- 3. Employee may work from vehicle and/or home (where job duties allow).

III. CONTRACTOR OPERATIONS

If a pandemic occurs all contractor operations will continue until the General Manager and executive staff determines otherwise. The Director of Operations & Engineering will communicate as necessary with the contractor.

IV. FORMS AND FUTURE ACTION PLANS

Any forms and/or department action plans such as employees identified as critical and/or able to work from home will be attached to this plan as they become available.

D. ANNEX D: WILDFIRE MITGATION PLAN WILDFIRE MITIGATION PLAN

PURPOSE

• The intent of this plan is to outline the wildfire mitigation efforts of the Cooperative related to its overhead electrical distribution lines and associated equipment throughout its service territory.

PLAN

• The Cooperative operations personnel will monitor weather conditions, county emergency management alerts and applicable state agency advisories regarding drought conditions and Red Flag warnings. Such sources include:

Texas A&M Forest (<u>www.texaswildfirerisk.com</u>) Texas Forest

Service (fire index ratings)

USFS fire danger class

NWS Red Flag warnings

- When conditions warrant (or when relevant advisories are issued), the Cooperative will require a visual inspection of any line that has been de- energized by protective relaying prior to re-energizing.
- The following is a list of the Cooperative stations with circuits located in areas susceptible to wildfires; responding local fire departments are also listed.

a. NAME	EMERGENCY AREA	TELEPHONE
Sheriff Dispatch Center	Dallam	806-244-2313
Sheriff Dispatch Center	Hartley	806-244-5544
Sheriff Dispatch Center	Sherman	806-366-5551
Sheriff Dispatch Center	Moore	806-935-4145
Sheriff Dispatch Center	Hutchinson	806-274-6343
Sheriff Dispatch Center	Hansford	806-659-4140
Sheriff Dispatch Center	Potter	806-379-2900
Sheriff Dispatch Center	Oldham	806-267-2162

• ANNEX E – HURRICANES

Not applicable. Cooperative service territory is not located near or within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management.

E. <u>ANNEX F – CYBERSECURITY</u>

1 PURPOSE

The purpose of this Incident Reporting and Response Plan is to provide a process for Cooperative's formal, focused, and coordinated approach to responding to security events categorized as either cyber security or physical security incidents.

This Incident Reporting and Response Plan ensures that incidents are responded to in a systematic approach that is consistent with Cooperative's overall objectives and strategies. The plan ensures communication efforts to appropriate federal agencies, law enforcement agencies, shareholders, customers, and the media are defined, focused, and controlled. The plan will also ensure consistent incident handling and response and provides for future development and refinement of security controls.

2 SCOPE

The Incident Reporting and Response Plan (IRRP) is applicable to all personnel who have been identified to have direct or indirect assigned duties for Cooperative. Cooperative maintains physical and cyber security best practices. These best practices are based on the NIST Cybersecurity Framework.

3 GOALS

Cooperative works to promote resilience and enhance cyber security capabilities and works to convey current information on emerging cyber threats and initiatives, including critical infrastructure protection efforts, and realistic practices for improving operational resilience. The information technology team will keep cooperative members and staff informed while maintaining a working partnership amongst the various cooperative functional groups on matters of cyber security. Short Term Goals:

- o Identify gaps in cyber management practices and recommend process improvements.
- Reinforce cyber security best practices and examine resilience concepts and objectives.
- Discuss processes to maintain and repeatedly carry out protection and sustainment activities for critical assets and services.
- Share information with cooperative functional groups related to cyber security policies, initiatives, and capabilities.

Long Term Goals:

- Address gaps in cyber management practices and implement process improvements.
- Document a process to maintain and repeatedly carry out protection and sustainment activities for critical assets and services.
- Enhance cyber incident response and business continuity capabilities.
- Increase the cybersecurity maturity and resilience of the cooperative.

4 ROLES AND RESPONSIBILITIES

This Incident Reporting and Response Plan must be followed by all personnel, including all employees, temporary staff, consultants, contractors, suppliers and third parties operating on behalf of Cooperative. All personnel are referred to as staff within this plan.

Below are details about the roles and responsibilities of each member of Cooperative to prevent and respond to a workplace incident. It is not an exhaustive list of duties but designed to give each employee a general understanding of their role and the roles of other employees in incident response and prevention.

Attachment A lists the name of the person who currently holds each role/position.

4.1 Incident Response Lead

The Incident Response lead is responsible for:

- Making sure that the Security Incident Reporting and Response Plan and associated response and escalation procedures are defined and documented. This is to ensure that the handling of security incidents is timely and effective.
- Making sure that the Security Incident Reporting and Response Plan is current, reviewed and tested at least once each year.
- Making sure that staff with Security Incident Reporting Response Plan responsibilities are properly trained at least once each year.
- Leading the investigation of a suspected breach or reported security incident and initiating the Security Incident Reporting and Response Plan when needed.
- Reporting to and liaising with external parties, including pertinent business partners, legal representation, law enforcement, etc., as is required.
- Authorizing on-site investigations by appropriate law enforcement or third-party security/forensic personnel, as required during any security incident investigation. This includes authorizing access to/removal of evidence from site.

4.2 Security Incident Response Team (SIRT)

The Security Incident Response Team (SIRT) is responsible for:

- Making sure that all staff understand how to identify and report a suspected or actual security incident.
- Advising the Incident Response Lead of an incident when they receive a security incident report from staff.
- Investigating and documenting each reported incident.
- Taking action to limit the exposure of sensitive data and to reduce the risks that may be associated with any incident.
- Gathering, reviewing, and analyzing logs and related information from various central and local safeguards, security measures and controls.
- Documenting and maintaining accurate and detailed records of the incident and all activities that were undertaken in response to an incident.
- Assisting law enforcement during the investigation processes. This includes any forensic investigations and prosecutions.
- Initiating follow-up actions to reduce likelihood of recurrence, as appropriate.
- Determining if policies, processes, technologies, security measures or controls need to be updated to avoid a similar incident in the future. They also need to consider whether additional safeguards are required in the environment where the incident occurred.

4.3 All Staff Members

All Staff Members are responsible for:

- Making sure they understand how to identify and report a suspected or actual security incident.
- Reporting a suspected or actual security incident to the Incident Response Lead (preferable) or to another member of the Security Incident Response Team (SIRT).
- Reporting any security related issues or concerns to management, or to a member of the SIRT.
- Complying with the security policies and procedures of Cooperative.

5 INCIDENT RESPONSE LIFE CYCLE

This Incident Response Plan is designed to provide a Cooperative-wide, systematic business approach to the Incident Response Life Cycle. The Incident Response Life Cycle is paralleled with business operations to perform impact analysis.



Integration with business operations to perform impact analysis

5.1 Life Cycle Objectives and Processes

5.1.1 Assessment

Establish an approach to analyze business impact and risk. Perform a risk analysis Cooperative wide and understand what assets and resources must be protected. Determine operational and financial risks that could impact business operations in the event of a security incident. Regularly review supply chain risk and vulnerability management assessments.

5.1.2 Preparation

Establish an approach to incident handling that includes development of policy and procedures. Review and codify an organizational security policy, perform a risk assessment, identify sensitive assets, define which are critical security incidents the team should focus on, and build a Security Incident Response

Team (SIRT).

5.1.3 Detection and Analysis

Analyze detection devices and reports from people to identify and classify the activity and begin handling the evidence. Monitor IT systems and detect deviations from normal operations and see if they represent actual security incidents. When an incident is discovered, collect additional evidence, establish its type and severity, and document everything.

5.1.4 Containment

Ensure the impact of the incident does not increase. Perform short-term containment, for example by isolating the network segment that is under attack. Then focus on long-term containment, which involves temporary fixes to allow systems to be used in production, while rebuilding clean systems.

5.1.5 Eradication

Determine the cause and remove it. Remove malware from all affected systems, identify the root cause of the attack, and take action to prevent similar attacks in the future.

5.1.6 Recovery

Restore the system to its original state and validate the clean system. bring affected production systems back online carefully, to prevent additional attacks. Test, verify and monitor affected systems to ensure they are back to normal activity.

5.1.7 Post-Incident Activity

Develop follow-up reports, identify lessons learned, and update procedures as necessary. No later than two weeks from the end of the incident, perform a retrospective of the incident. Prepare complete documentation of the incident, investigate the incident further, understand what was done to contain it and whether anything in the incident response process could be improved. In some instances, documentation may be needed for compliance requirements.

5.2 Integration of Business Operations

Develop a risk register which includes the systems and processes necessary to continue business operations and the impacts of each in the event systems are not available. The risk register should also include a list of contacts. The integration of business operations will assist incident handlers and stakeholders with identifying potential risks and associated services along the incident response life cycle. The risk register and contact lists should be kept as a hard copy for reference when systems are not available.

6 INCIDENT SCORING AND IMPACT RATING

Cooperative uses a weighted arithmetic mean to produce a score from zero to 10. This score drives the incident triage and escalation processes and assists in determining the prioritization of limited incident response resources and the necessary level of support for each incident.

(Current Functional Impact * 40%) + (Potential Functional Impact * 25%) + (Informational Impact * 10%) + (System Criticality *20%) + (Recoverability Timeframe * 5%) = The Incident Score

The five factors are assigned values between 0 and 10 based on value assigned the individual severity rating for each of the factors as described in this plan using the formula above.

The purpose of weighting the factors is to provide a repeatable formula that is heavily biased by the actual impact of the incident but also considers potential impacts to Cooperative if the incident were not contained guide appropriate actions with sufficient urgency to prevent a minor or moderate incident

7 Incident Categorization

7.1 CAT 1 UNAUTHORIZED ACCESS

Physical

- 1. Could the incident impact the reliability of the bulk power system?
- 2. Was there intentional damage to security systems that protect the physical perimeter.
- 3. Was sensitive information lost or removed without authorization. Was social engineering involved?

Cyber

- 1. Could the incident impact Cooperative? Was social engineering involved? Was sensitive information copied, transmitted, viewed, stolen or used by an unauthorized individual?
- 2. Was this an attempt to compromise Cooperative either electronically or physically? (report within 1 hour)

7.2 CAT 2 DENIAL OF SERVICE

- 1. Was malicious software or data modification discovered on a cyber asset or assets that may impact the reliability of the bulk power system?
- 2. Was social engineering involved?
- 3. If yes to any of these questions report to E-ISAC within the listed timeframe

7.3 CAT 3 MALICIOUS CODE

- 1. Was malicious software or data modification discovered on a cyber asset or assets that may impact the reliability of Cooperative?
- 2. Was social engineering involved?

7.4 CAT 4 IMPROPER USAGE

Was social engineering involved?

Did an unauthorized employee access confidential or restricted resources?

7.5 CAT 5 SCANS/PROBES/ATTEMPTED ACCESS/SURVEILLANCE/THREATS

Physical

- 1. Was this an attempt to compromise Cooperative either electronically or physically?
- 2. Was suspicious photo taking observed?
- 3. Were suspicious surveillance activities observed?
- 4. Was a suspicious fly over observed?
- 5. Was a threat communicated where the threatened action has the potential to damage or compromise facility or personnel?
- 6. Were explosives discovered at or near a facility?
- 7. Were there suspected or actual attacks against generation, transmission, or company-owned or operated communication facilities, cyber assets, or personnel?

7.6 CAT 6 INVESTIGATION

- 1. Could the incident impact the reliability of Cooperative?
- 2. Is there targeted, focused, or repetitive attempted access to cyber assets (such as critical cyber assets) whose impairment could impact bulk power system reliability?

- 4. Was a threat communicated where the threatened action has the potential to damage or compromise facility or personnel?
- 5. Was this an attempt to compromise the bulk power system either electronically or physically?

8 INCIDENT REPORTING

8.1 GUIDELINES Reporting Forms

It Group-Teams / Erik Badillo

INFORMATION SECURITY INCIDENT REPORT FORM

INCIDENT IDENTIFICATION INFORMATION		
Incident Detector's Informat	ion:	
Name:	Date/Time Detected	
Title:	Title: Location:	
Phone/Contact Info:	System/A	Application:
	INCIDENT SUN	IMARY
Type of Incident Detected:		
Denial of Service	Malware / RansomWare	Unauthorized Use / Disclosure
Loss / theft		
Unauthorized Access	Unplanned Downtime	Inadvertent site security
Phishing		Other:
Description of Incident:		
Names of Others Involved:		
	INCIDENT NOTII	FICATION
IS Leadership	System/A	Application Owner
Security Incident Response Tea	um System/A	Application Vendor
Administration	Public A	ffairs
Human Resources	Legal Co	unsel
Other:		
A	CTIONS (Include Star	t & Stop Times)
(Phase I) Identification Meas	ures (Incident Verified, A	ssessed, Options Evaluated):
(Phase II) Containment Measures:		
Evidence Collected (Systems	Logs, etc.):	
(Phase III) Eradication Meas	ures:	
l		

ACTIONS (Include Start & Stop Times)

ACTIONS (Include Start & Stop Times)

(Phase IV) Recovery Measures

EVALUATION

How Well Did the Workforce Members Respond?

Were the Documented Procedures Followed? Were They Adequate?

What Information Was Needed Sooner?

Were Any Steps or Actions Taken That Might Have Inhibited the Recovery?

What Could the Workforce Members Do Differently the Next Time an Incident Occurs?

What Corrective Actions Can Prevent Similar Incidents in the Future?

What Additional Resources Are Needed to Detect, Analyze, and Mitigate Future Incidents?

Other Conclusions/Recommendations:

FOLLOW-UP		
Review By (Organization to	Security Official	IS Department/Team
determine):	Other:	
Recommended Actions Carried Out:		
Initial Report Completed By:		
Follow-Up Completed By:		

8.2 Reporting Agency Forms (External)

8.2.1 Department of Energy (DoE)

Required Respondents (taken from the DoE website)

Electric utilities that operate as Control Area Operators and/or Reliability Authorities as well as other electric utilities, as appropriate, are required to file the form. The form is a mandatory filing whenever an electrical incident or disturbance is sufficiently large enough to cross the reporting thresholds. Reporting coverage for the Form DOE-417 includes all 50 States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and the U.S. Trust Territories.

Electric Disturbance Events (DOE-417)

Online Form: <u>https://www.oe.netl.doe.gov/OE417/</u>

Downloadable PDF Form: <u>https://www.oe.netl.doe.gov/docs/OE417_Form_05312024.pdf</u>

Offline Reporting: If you are unable to submit online or by fax, forms may be e-mailed to <u>doehqeoc@hq.doe.gov</u>, or call and report the information to the following telephone number: (202) 586-8100.

8.2.2 Electricity Information Sharing and Analysis Center (E-ISAC)

The Electricity Information Sharing and Analysis Center (E-ISAC) provides Cooperative an option to add a physical or cyber bulletin posting for information sharing purposes. An account must be created and approved for sharing information. Information shared may include details about a security incident attack and the Indicators of Compromise (IoC) to assist other cooperatives with mitigation of similar attacks.

E-ISAC website login: <u>https://www.eisac.com</u>

8.3 What to Include in your Incident Report

The following format is a guide. While internal reporting must be complete, some external reports may need to omit certain pieces of information to retain confidentiality. External reporting should be reviewed by managers, senior leadership, and sometimes legal counsel.

The following must be determined for each incident:

- Incident Type
- Names of system(s) involved (spell out each acronym used at its first use
- o If the system has failed over to an available backup system
- Categorization of system(s) involved
- Type of data involved (Confidential or Restricted Information)
- Functional use of systems involved
- Identified or suspected cause of incident
- Identified or suspected impact of incident
- What dangers or effects on the facility or facility personnel safety may be caused by the event?

- If the incident has the potential to spread across other networks or even outside to partners or customers
- Investigation, containment, and remediation steps taken
- Incident detection/identification method
- Parties involved (include descriptive titles and names if required for remediation)
- Date and timeframe of occurrence(s)
- If the reported incident is real or a false positive
- What stage the incident is in—beginning, in process, or has already occurred
- What organizations will be affected and who should be part of the response.

If applicable, provide:

- Host-based indicators, Network indicators, and Email characteristics
- Security controls that blocked and/or detected the activity
- Date/time the activity was blocked and/or detected
- Host operating systems
- Name of malicious logic
- How did the exploit occur, and can it happen again? In what timeframe?
- What type of attacker tools if any were placed onto the system?
- Actions taken by affected system
- Network activity observed (including IPs and URLs connections made or attempted, associated ports)
- Type of unauthorized access attempted or obtained (including capabilities associated with that type of access)
- Attack vector

For incidents involving privacy or PII, also include:

- The number of individuals
- The number of records
- The number of data points or source of compromise

9 COMMUNICATIONS

9.1 Internal Reporting Chain

Cooperative's Internal Reporting Chain during an incident is based on the severity rating. If a member of the reporting chain is unavailable, their designated delegate will be contacted. If the both the primary and their delegate cannot be contacted, the next person in the chain will be notified. All members of the chain must select a delegate.

Severity	Reporting Guidence
Insignificant	Reporting is not necessary
Low	The Incident Response Lead will notify the Information Security Manager who
	then decides whether or not to notify the Director of IT Security who then decides
	whether or not to notify the General Manager.

Savarity	Reporting Guidence
Medium	The Incident Response Lead will notify the Information Security Manager who then notifies the Director of IT Security who then decides whether or not to notify the General Manager.
High	The Incident Response Lead will notify the Information Security Manager who then notifies the Director of IT Security who then notifies the General Manager. The ISM also informs other departments that have a need to know. At this severity level, the ISM will establish a Virtual channel for incident handling activities understanding that Confidential or Restricted Information is not stored or shared via the channel.
Extreme	The Incident Response Lead will notify the Information Security Manager who then notifies the Director of IT Security who then notifies the President and Chief Executive Officer. The ISM also informs other departments that have a need to know. At this severity level, the ISM will establish a Virtual channel for incident handling activities understanding that Confidential or Restricted Information is not stored or shared via the channel.

эле ехсеннансер		
Name	Email	Phone
Department of	https://www.oe.netl.doe.gov/OE417/	(202) 586-8100
Energy (DOE)		
	FAX Form DOE-417 to (202) 586-8485	
	Email Form DOE-417 to <u>doehqeoc@hq.doe.gov</u>	
E-ISAC	operations@eisac.com	404-446-9780 #2
Federal Bureau of	dallas.fbi.gov	972-559-5000
Investigation (FBI)		
NCCIC (includes	<u>central@cisa.gov</u>	1-888-282-0870
ICS-CERT and US-	Online form: <u>https://us-cert.cisa.gov/forms/report</u>	
CERT)		
ICS-CERT	<u>soc@us-cert.gov</u>	1-888-282-0870
	online form: <u>https://us-cert.cisa.gov/forms/report</u>	
US-CERT	soc@us-cert.gov	1-888-282-0870
	•	•

9.2 External Reporting Chain

	online form: <u>https://us-cert.cisa.gov/forms/report</u>	
Department of	Chad Adams	1-888-282-0870
Homeland	CISARegion6@hq.dhs.gov	
Security, Cyber		
Security Regional		
Contact		

9.3 Key Vendor Contacts

National Information Solutions Corp (NISC) 1(866)999-6472

Paradigm Technologies 412 Denrock Ave Dalhart TX 79022 (806)249-4748 Travis Welch (806)268-3403

9.4 Media Communications

Only employees authorized by the General Manager and his or her designee are permitted to speak to, give statements to, or participate in interviews with members of the news media as an official representative of the Cooperative.

By default, employees are not authorized by the General Manager to communicate with the news media as an official representative of the Cooperative and should refer any news media enquiries to an authorized employee.

9.5 Impaired Communications

Cooperative will identify another means to establish communications in the event that communications are disrupted. Cooperative will utilize cell phones, networks, the internet, etc.

10 FORENSICS

Cooperative, when deemed necessary to investigate possible criminal activity, will provide forensic services and it is not intended for law enforcement or to be court admissible. If it is determined that forensics be conducted, the cooperative shall require a dedicated evidence storage and analysis facilities with physical access limited to authorized forensics personnel, mobile evidence gathering tools required to establish chain of custody; to collect and label evidence at incident sites; and to securely package and transport the collected evidence. Cooperative shall: Develop, maintain, and follow a Standard Operating Procedure (SOP) for computer forensics collection and analysis follow Cooperative disclosure and privacy guidance and maintain a chain of custody of evidence. In the event that law enforcement services are required, the Incident Response Lead makes initial contact with senior leadership, legal and law enforcement organizations to establish evidentiary chain of custody. The Incident Response Lead will coordinate with appropriate law enforcement organizations. If necessary, Cooperative or the Incident Response Lead making equipment to a designated computer forensic processing facility. If it is determined that the source of the suspected criminal activity is external to Cooperative, the appropriate law enforcement organizations who will inform Cooperative at the earliest time possible.

11 TESTING AND PLAN CHANGES

The Incident Reporting and Response Plan will be reviewed and tested at least once every 24 calendar

months for updates and improvements. Cooperative reserves the right to modify or amend this policy at any time, with or without prior notice. No later than 90 calendar days after completion of a Cyber Security Incident response plan(s) test or actual Reportable Cyber Security Incident response, lessons learned, or the absence of any lessons learned will be documented. The Incident Reporting and Response Plan will be updated and distributed to those individuals with a documented role and responsibility in the IRRP via email based on any documented lessons learned associated with the plan. If roles and responsibilities change or if there is a technology change that impacts Cooperative's ability to execute the plan, the Incident Reporting and Response Plan will be updated and each person with a defined role and responsibility in the IRP will be notified via email.

12 TRAINING REQUIREMENTS FOR INCIDENT RESPONSE TEAMS

Training requirements for the incident handlers includes:

- o Intrusion Detection System training
- Security Information and Event Management training (if applicable)
- Ticketing/Reporting system
- o Additional security monitoring and reporting tools as necessary
- o Regular review of the Incident Response and Reporting Plan
- Cybersecurity Framework for all areas of Cooperative
- Communications applications (Teams, etc.)
- Practice with locating and filling our External Agency reports (DoE, E-ISAC, etc.)
- 13 ROADMAP FOR MATURING THE INCIDENT RESPONSE CAPABILITY

Cooperative will follow the <u>Electricity Subsector Cybersecurity Capability Maturity Model</u> (ES-C2M2), to define their roadmap for maturity in Incident Reporting and Response Planning.

(A)	Warmely.
Incident Response Lead	Brent Wheeler, CEO/General Manager
Security Incident Response Team (SIRT)	Erik Badillo, IT Administrator

ATTACHMENT A – ASSIGNED ROLES

ATTACHMENT B – Incident Response Plan Checklist

Response

Responding to security incidents can take several forms. Incident response actions may include triaging alerts from your endpoint security tools to determine which threats are real and/or the priority in which to address security incidents. Incident response activities can also include containing and neutralizing the threat(s)—isolating, shutting down, or otherwise "disconnecting" infected systems from your network to prevent the spread of the cyber attack. Additionally, incident response operations include eliminating the threat (malicious files, hidden backdoors, and artifacts) which led to the security incident.

- Immediately contain systems, networks, data stores and devices to minimize the breadth of the incident and isolate it from causing wide-spread damage.
- Determine if any sensitive data has been stolen or corrupted and, if so, what the potential risk might be to your business.
- Eradicate infected files and, if necessary, replace hardware.
- Keep a comprehensive log of the incident and response, including the time, data, location and extent of damage from the attack. Was it internal, external, a system alert, or one of the methods described previously? Who discovered it, and how was the incident reported? List all the sources and times that the incident has passed through. At which stage did the security team get involved?
- Preserve all the artifacts and details of the breach for further analysis of origin, impact, and intentions.
- Prepare and release public statements as soon as possible, describe as accurately as possible the nature of the breach, root causes, the extent of the attack, steps toward remediation, and an outline of future updates.
- Update any firewalls and network security to capture evidence that can be used later for forensics.
- Engage the legal team and examine compliance and risks to see if the incident impacts any regulations.
- Contact law enforcement if applicable since the incident may also impact other organizations. Additional intelligence on the incident may help eradicate, identify the scope, or assist with attribution.

Post-incident activities (Recovery and Follow-up actions) include eradication of the security risk, reviewing and reporting on what happened, updating your threat intelligence with new information about what's good and what's bad, updating your IR plan with lessons learned from the security incident, and certifying then re-certifying your environment is in fact clear of the threat(s) via a post-incident cybersecurity compromise assessment or security and IT risk assessment.

Recovery

- Eradicate the security risk to ensure the attacker cannot regain access. This includes patching systems, closing network access, and resetting passwords of compromised accounts.
- During the eradication step, create a root cause identification to help determine the attack path used so that security controls can be improved to prevent similar attacks in the future.

- Perform an enterprise-wide vulnerability analysis to determine whether any other vulnerabilities may exist.
- Restore the systems to pre-incident state. Check for data loss and verify that systems integrity, availability, and confidentiality has been regained and that the business is back to normal operations.
- Continue to gather logs, memory dumps, audits, network traffic statistics and disk images.
 Without proper evidence gathering, digital forensics is limited so a follow-up investigation will not occur.

Follow-Up

- Complete an incident response report and include all areas of the business that were affected by the incident.
- Determine whether management was satisfied with the response and whether the organization needs to invest further in people, training or technology to help improve its security posture.
- Share lessons learned. What went well, what didn't and how can procedures be improved in the future?
- Review, test and update the cybersecurity incident response plan on a regular basis, perhaps annually if possible.
- Conduct a compromise assessment or other security scans on a regular basis to ensure the health of systems, networks and devices.
- Update incident response plans after a department restructure or other major transition.
- Keep all stakeholders informed about the latest trends and new types of data breaches that are happening. Promote the message that "security is everyone's job."

ATTACHMENT C – Ransomware Attack Response and Prevention Ransomware Attack Response Checklist

Step 1: Disconnect Everything

- □ Unplug computer from network
- □ Turn off any wireless functionality; Wi-Fi, Bluetooth, NFC

Step 2: Determine the Scope of the Infection, Check the Following for Signs of Encryption

- \Box Mapped or shared drives
- □ Mapped or shared folders from other computers
- \Box Network storage devices of any kind
- External Hard Drives
- USB storage devices of any kind (USB sticks, memory sticks, attached phones/cameras)
- □ Cloud-based storage: Drop Box, Google Drive, OneDrive etc.

Step 3: Determine Ransomware Strain

□ What strain/type of ransomware? For example: CyrptoWall, Teslacrypt etc.

Step 4: Determine Response

Ransomware response should be determined by a response team, senior leadership, and legal counsel at a minimum. In many cases, law enforcement may provide addition insight or suggestions. You may also want to call in a ransomware response team to assist with restoration.

Response 1: Restore your Files from Backup

- 1. Locate your backups
 - o Ensure all files you need are there
 - Verify integrity of backups (i.e., media not reading or corrupted files)
 - Check for Shadow Copies if possible (may not be an option on newer ransomware)
 - Check for any previous versions of files that may be restored on cloud storage e.g., DropBox, GoogleDrive, OneDrive
- 2. Remove the ransomware from your infected system
- 3. Restore your files from backups
- 4. Determine infection vector and handle

Response 2: Try to Decrypt

- 1. Determine strain and version of the ransomware if possible
- 2. Locate a decryptor, there may not be one for newer strains; If successful, continue to next steps...
- 3. Attach any storage media that contains encrypted files (hard drives, USB sticks etc.)
- 4. Decrypt files
- 5. Determine the infection vector and handle

Response 3: Do Nothing (Lose Files)

- 1. Remove the ransomware
- 2. Backup your encrypted files for possible future decryption (optional)

Response 4: Negotiate and/or Pay the Ransom

- 1. If possible, you may attempt to negotiate a lower ransom and/or longer payment period
- Determine acceptable payment methods for the strain of ransomware: Bitcoin, Cash Card etc.
 Obtain payment, likely Bitcoin:
 - Locate an exchange you wish to purchase a Bitcoin through (time is of the essence)
 - Set up account/wallet and purchase the Bitcoin
 - 4. Re-connect your encrypted computer to the internet 5. Install the TOR browser (optional)
 - 5. Install the FOR browser (optional)
- 6. Determine the Bitcoin payment address. This is either located in the ransomware screen or on a TOR site that has been setup for this specific ransom case
 - 7. Pay the ransom: Transfer the Bitcoin to the ransom wallet
 - 8. Ensure all devices that have encrypted files are connected to your computer
 - 9. File decryption should begin within 24 hours, but often within just a few hours
 - 10. Determine infection vector and handle

Step 5: Protecting yourself in the Future

□ Implement Ransomware Prevention Checklist to prevent future attacks

Ransomware Prevention Checklist

First Line of Defense: End Users

- □ Implement effective security awareness training to educate users on what to look for to prevent criminal applications from being downloaded/executed.
- □ Conduct simulated phishing attacks to inoculate users against current threats.

□ Require multi-factor authentication for all end user accounts, regular and administrative

Second line of Defense: Software

- □ Ensure you have and are using a firewall.
- □ Implement antispam and/or ant phishing. This can be done with software or through dedicated hardware.
- Ensure everyone in your organization is using top notch up-to-date antivirus software, or more advanced endpoint protection products like whitelisting and/or real-time executable blocking.
- □ Implement software restriction policies on your network to prevent unauthorized applications from running. (optional)
- □ Implement a highly disciplined patch procedure that updates any and all applications that have vulnerabilities.

Third Line of Defense: Backups

- □ Implement a backup solution: Software based, hardware based, or both.
- □ Ensure all possible data you need to access or save is backed up, including mobile/USB storage.
- Ensure your data is safe, redundant and easily accessible once backed up.
- □ Regularly test the recovery function of your backup/restore procedure. Test the data integrity of physical backups and ease-of-recovery for online/software based backups.

ANNEX G – PHYSICAL SECURITY INCIDENT

1. PURPOSE

This document provides Cooperative personnel with the tools necessary to understand and identify a possible or actual local physical security event at Cooperative's facilities and immediately report suspicious activity or actual malicious destruction of any of their facilities. It addresses how personnel interact with each other and other entities to provide timely information and situational awareness. In order to recognize a physical security event, one must understand what a physical security event is. For this procedure, the following definitions will be utilized:

<u>Sabotage</u> is defined as a deliberate action designed to disrupt or destroy any facilities, including, but not limited to, elements of the Bulk Electric System (BES). It can also be a deliberate action at weakening or destroying infrastructure through subversion.

<u>Vandalism</u> is defined as the malicious and deliberate defacement or destruction of property.

<u>Criminal Mischief</u> is defined as any damage, defacing, alteration, or destruction of tangible property with criminal intent.

Vandalism and Criminal Mischief can, and often do, go hand in hand with each other.

2. **DEFINITION**

This document provides Cooperative personnel with the tools necessary to understand and identify a possible or actual local physical security event at Cooperative's facilities and immediately report suspicious activity or actual malicious destruction of any of their facilities. It addresses how personnel interact with each other and other entities to provide timely information and situational awareness.

3. RECOGNITION

All Cooperative personnel are responsible for following the reporting procedures in this section for any event that involves:

- Damage or destruction of facilities that results from actual or suspected intentional human action.
- Physical threats to Cooperative's personnel.
- Physical threats to a facility that have the potential to degrade the normal operation.
- Suspicious device or activity at a facility.
- Theft that has the potential to degrade operation

Determining what is truly Sabotage from Vandalism or Criminal Mischief can be a daunting task. The key to determining physical security is intent. If the intent is to disrupt or disable the BES, then the event would be considered Sabotage. Most events experienced by Cooperative are simply mischievous people

or those with criminal intent. Below is a list of events that may possibly occur on Cooperative's system and the determination of the event status:

Sabotage Event	Criminal Mischief/Vandalism Event
Unbolting transmission tower legs (deliberate act to cause harm to the electric system and electric operations)	A farmer who cuts a pole down due to blocking access to his fields (intent is access property not disrupt electric operations)
Coordinated destruction of wooden structures (deliberate and coordinated attack to cause harm to the electric system and electric operations)	Entry into a substation to steal copper conductor (intent is theft by taking, not disruption of electric operations)
Shooting transmission facilities intending to cause destruction and electrical disturbances (typically multiple insulator strings along a stretch of line)	Isolated shooting of a transmission line insulator (intent is criminal (destruction of property), not disruption of electric operations)
Breaking and entering into a substation to destroy equipment (intent is to disrupt electric operations and cause harm to the BES and electric operations)	Motor vehicle accident (consequence of action may be harm to the BES or electric operations; however, the intent was not to cause disruption)
Driving a motor vehicle through a substation fence (substations are typically away from road rights of ways indicating an intentional action)	Graffiti on equipment (while this indicates entry into station, the intent was not disruption and no physical damage was done to facilities)
Deliberate cyber attack or cyber intrusion with intent to disrupt or take down SCADA network that could have a material impact on the BES	Deliberate cyber intrusion with the intent of stealing personally identifiable information for the purposes of stealing Cooperative's personnel' identities for monetary gain

Suspicious Activity, Objects, or Persons		
Threats to disrupt or damage Cooperative's electric system or other infrastructure	Threats to injure Cooperative's personnel	
Intentional injury to Cooperative's personnel	Unauthorized attempts to access Cooperative's facilities, such as a substation	
Unauthorized individuals present on Cooperative's property who exhibit suspicious behavior	Unauthorized photography of Cooperative's facilities	
Unauthorized access or attempted access to the Cooperative's computer systems through physical or cyber intrusion	Unknown persons loitering in the vicinity of Cooperative's facilities for extended periods of time	
Individuals, without proper identification or escort, and /or having unusual dress, appearance, or accents	Unknown person calling Cooperative's facilities to ascertain security, personnel or procedural information	
Unknown persons who attempt to gain information about Cooperative's facilities by	Theft of facility vehicles, personnel identification, uniforms or operating procedures	

walking up to personnel or their families and	
engaging them in a conversation	

4. REPORTING POSSIBLE OR ACTUAL PHYSICAL SECURITY INCIDENT (COOPERATIVE FIRST RESPONDER)

The Cooperative employee who discovers a possible or actual physical security event (First Responder) should take the following actions upon discovery if the Cooperative employee's safety is not at risk:

Actions Upon Discovery of a Possible or Actual Physical security Event (First Responder)
1. Make sure the scene is safe for you and the public. Make the scene safe if possible.
2. Stay calm and quickly report to your General Manager.
3. Make a clear and accurate report to your General Manager. Provide your name and contact information.
 Describe the possible or actual physical security act. Be as specific as possible.
5. Remain in contact with your General Manager until released. Additional information may be requested.
6. Record any information about your surroundings including vehicles, people, or abnormal odors.
7. Remain available for further questions from law enforcement.

your personal safety is at risk, retreat to a safe area and contact your General Manager as

If your personal safety is at risk, retreat to a safe area and contact your General Manager as soon as possible. Notify law enforcement and emergency services for response to the scene. Keep the public away from the danger and evacuate area as necessary.

5. REPORTING POSSIBLE OR ACTUAL PHYSICAL SECURITY (MANAGER)

Once a possible or actual physical security event has been reported, the Manager shall inform all operating personnel of the possible or actual event. The Cooperative shall as soon as possible notify their Manager of the event and details. The Cooperative should provide the following information:

Information to Provide to the General Manager (see Appendix B for Physical Security Incident Information Form)

1. Geographic area and county affected/impacted.
2. Date and time incident began.
3. Date and time incident ended.
4. Did the incident originate at your Cooperative?
5. Amount of demand involved (estimated).
6. Number of member-consumers affected.
7. Physical or cyber attack.
8. Equipment involved in the event.
9. Description of events.
10. Station or line identifiers.

6. Roles

Cooperative serve as First Responders for this procedure and must never ignore a suspected or actual act of physical security or suspicious person, object or activity that could threaten the Cooperative's facilities, personnel or operations. In addition, the Cooperative provides key information to their Transmission Operator to allow for timely and accurate reporting of possible or confirmed physical security events or subversive activities.

7. Training

Cooperative shall review and perform training on this procedure at least annually.

<u>ATTACHMENT A</u> <u>Physical Security Incident Information Form</u>

Cooperative:		
2. Location of incident (e.g. county, city, line and station identifiers):		
3. Type of incident (e.g. physical, cyber):		
4. System parameters before the incident (Voltage, Frequency, Flows, Lines, Substations, etc.)		
5. System parameters after the incident:		
6. Network configuration before the incident		
7. Relay indications observed and performance of protection:		
8. Damage to equipment:		
9. Supplies interrupted and duration, if applicable:		
10. Amount of electric service lost (demand/member-consumers), if applicable:		
11. Estimate of time to return to service:		
12. Cause of incident (if known):		
13. Any other relevant information including notifications [and remedial action taken]:		
14. Recommendations for future improvement/repeat incident:		

Time:	
Date:	Signature and Designation of the Distribution Cooperative Person(s) Reporting the Incident

Rita Blanca Electric Cooperative Physical Protection Policy PURPOSE

The purpose of this policy is to provide guidance for agency personnel, support personnel, and private contractors/vendors for the physical, logical, and electronic protection of Rita Blanca Electric Cooperative (RBEC). All physical, logical, and electronic access must be properly documented, authorized and controlled. This Physical Protection Policy focuses on the appropriate access control methods needed to protect from insider and outsider threats.

Physically Secure Location

A physically secure location is a facility or an area, a room, or a group of rooms within a facility with both the physical and personnel security controls sufficient to protect the employees and associated information systems. The secure location shall be separated from non-secure locations by physical controls. Security perimeters shall be defined, controlled, and secured. Restricted non-public areas in RBEC shall be identified with a sign at the entrance.

Visitors Access:

A visitor is defined as a person who visits the RBEC facility on a temporary basis who is not employed by RBEC and has no unescorted access to the physically secure location within RBEC and associated information systems are located.

Visitors shall:

- Check in before entering a physically secure location by:
 - $\,\circ\,\,$ Provide a form of identification used to authenticate visitor.
- Be accompanied by a RBEC escort at all times to include delivery or service personnel. An escort is defined as authorized personnel who accompany a visitor at all times while within a physically secure location to ensure the protection and integrity of the physically secure location. The use of cameras or other electronic means used to monitor a physically secure location does not constitute an escort.
- Show RBEC personnel a valid form of photo identification.
- Not be allowed to view screen information mitigating shoulder surfing.
- Individuals not having any legitimate business in a restricted area shall be courteously escorted to a public area of the facility. Strangers in physically secure areas without an escort should be challenged. If resistance or behavior of a threatening or suspicious nature is encountered, sworn personnel shall be notified or call 911.
- Not be allowed to sponsor another visitor.
- Not enter into a secure area with electronic devices unless approved by RBEC.
- All requests by groups for tours of RBEC facility will be referred to the proper agency point of contact for scheduling. In most cases, these groups will be handled by a single form, to be signed by a designated group leader or representative. Remaining visitor rules apply for each visitor within the group. The group leader will provide a list of names to front desk personnel for instances of emergency evacuation and accountability of each visitor while on agency premises.

Authorized Physical Access:

Only authorized personnel will have access to physically secure non-public locations. RBEC will maintain and keep current a list of authorized personnel. All physical access points into the agency's secure areas will be authorized before granting access. The agency will implement access controls and monitoring of physically secure areas. Authorized personnel will take necessary steps to prevent and protect the agency from physical, logical and electronic breaches.

- Use of electronic media is allowed only by authorized RBEC personnel. Controls shall be in place to protect electronic media and printouts.
- Report any physical security incidents to RBEC to include facility access violations, loss of laptops, cell phones, and ipads.
- Ensure data centers with RBEC are physically and logically secure.
- In the event of ended employment, the individual must surrender all property and access managed by the local agency, state and/or federal agencies.
- Not use food or drink around information technology equipment.
- Know which door to use for proper entry and exit of RBEC and only use marked alarmed fire exits in emergency situations.
- Ensure the perimeter security door securely locks after entry or departure. Do not leave any perimeter door propped opened and take measures to prevent piggybacking entries.

BOMB THREAT PROCEDURES

This guick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with the first responders and other stakeholders.

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the reverse of this card.

If a bomb threat is received by phone:

- 1. Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
- 2. Listen carefully. Be polite and show interest.
- 3. Try to keep the caller talking to learn more information.
- 4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
- 5. If your phone has a display, copy the number and/or letters on the window display.
- 6. Complete the Bomb Threat Checklist immediately. Write down as much detail as you can remember. Try to get exact words.
- 7. Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities immediately with information and await instructions.

If a bomb threat is received by handwritten note:

Call

• Handle note as minimally as possible.

If a bomb threat is received by e-mail:

Call

 Do not delete the message. Signs of a suspicious package:

- No return address Excessive postage
- Misspelled words
 - Incorrect titles
 - Foreign postage
 - Restrictive notes
- Strange sounds Unexpected delivery
- * Refer to your local bomb threat emergency response plan for evacuation criteria

DO NOT:

Stains

Strange odor

Use two-way radios or cellular phone. Radio signals have the potential to detonate a bomb.

WHO TO CONTACT (Select One)

- 911
- ٠ **Follow your local guidelines**

For more information about this form contact the Office for Bombing Prevention at: OBP@cisa.dhs.gov



BOMB THREAT CHECKLIST

DATE:

TIME:

TIME CALLER HUNG UP:

PHONE NUMBER WHERE CALL RECEIVED:

Ask Caller:

- Where is the bomb located? (building, floor, room, etc.)
- When will it go off?
- What does it look like?
- What kind of bomb is it?
- What will make it explode?

What is your name

- Did you place the bomb? Yes No
- · Why?

Exact Words of Threat:

Information About Caller:

- Where is the caller located? (background/level of noise)
- · Estimated age:

Is voice familiar? If so, who does it sound like?

• 0	Other points:		
Call	er's Voice	Background Sounds	
	Tomala		Threat Language
<u>ы</u> г	emale		
	lale	□ House noises	Message read
	Accent	Kitchen noises	Taped message
	Angry	Street noises	Irrational
	Calm	□ Booth	Profane
□ C	Clearing throat	PA system	□ Well-spoken
	Coughing	Conversation	•
□ C	Cracking Voice	Music	
	Crying	□ Motor	
	Сеер	Clear	
	Deep b reathing	Static	
	Disguised	Office machinery	
	Distinct	Factory machinery	
	Excited	Local	
	aughter.	Long distance	
	.isp	-	
	.oud	Other Information:	
	lasal	other miormation.	
D N	lormal		

59

Ragged □ Rapid □ Raspy □ Slow □ Slurred

□ Soft □ Stutter

Poorly handwritten

F. ANNEX H: REQUIREMENTS FOR TRANSMISSION AND DISTRIBUTION UTILITIES

Not Applicable. Cooperative is not a Transmission and Distribution Utility as defined under 16 TAC §25.5.

G. ANNEX: I- Rita Blanca Electric Facilities

12198 US Hwy 87, Dalhart TX 79022

OPERATIONS PRIMARY EMERGENCY CONTACT LIST

Brent Wheeler Tracy Howell Preston Mead CEO/General Manager Operations Manager Outside Engineering Supervisor



PUBLIC EMERGENCY CONTACT LIST

Fire / Hazmat	911	806-244-5454
Police	911	806-244-5544
Sheriff	911	806-244-2313
EMS	911	806-244-4571
Poison Control	911	800-764-7661
Coon Memorial Hospital		806-244-4571
Moore County Hospital		806-935-7171
XIT Telephone	806-384-3311	

Gas Companies

✤ Atmos	800-692-4694
 Atmos-Boyd Barrow 	806-220-6934
✤ WTG	806-244-4513
✤ NTG	806-244-5744
VCEL Area Control 60 KV and Above	
ACEL AIea Control 09 K v and Above	

Below 69 KVTexas Department of Transportation1-806-249-2071Texas Electric Cooperatives Association1-512-454-0311TNRCC1-512-239-6832EPA1-202-554-1404NISC1-800-345-2237Golden Spread Electric1-806-379-7766

Guernsey	1-405-416-8100
SGS Engineering	1-806-795-6827
Viz Engineering Dig Tess	1-806-598-0191 1-800-344-8377

FLEET EMERGENCY CONTACTS

Fleet management is the responsibility of the operations manager. He is responsible for the maintenance and repair of all motorized vehicles used by the outside crew. He will coordinate with the General Manager concerning the need to purchase or replace vehicles. During emergency situations, he will be responsible for securing fuel. Rita Blanca Electric has the ability to purchase fuel from Frontier Fuel, AEG (including fuel trailer), and West Texas Gas. All of these entities have the ability to provide fuel in adverse conditions in the event that service stations are without power. Additionally, Rita Blanca Electric is diverse and not dependent on any one source for vehicle repairs. These repair facilities are:

Hart Chevrolet	806-244-4596	
XIT Ford/Dodge	806-244-8511	
Hart Motors	806-244-5555	
West Texas Cat	806-249-8772	
KDM-Kevin Hightower	806-268-0366	
UER	806-376-6655	806-373-3168
Altec	972-937-8284	
Heiser Tire	806-244-3528	
Roberts Truck Center	806-355-9771	
Terex Utilities – Polecat	210-476-7777	
Yellow House John Deere 806-736-0262		

The following numbers are for crane services.

Whitehurst Steel Erectors	806-244-3997	806-674-3822
Panhandle Steel	806-355-2491	806-622-3207
Austin Aycock	806-335-6277	
The following numbers are trucking companies.

P–P Delco	806-249-2701
Dell Peeples	806-333-5175
Butch Owens	806-884-9112

ORGANIZATIONAL AND PERSONNEL ASSIGNMENTS

Situation assessment

Upon the onset of a disaster, the manager and /or engineering department shall assess the damage to the system as to the extent of damage and the personnel and equipment necessary to repair and return the system to normal operations. - Utilize an airplane for aerial patrol

- Utilize ground vehicles where practical
- Use ATVs if necessary
- List all damage by line section and by substation
- Prioritize damage for restoration procedure

Incoming calls

The Inside Operations Manager should be responsible for organizing the office personnel to cover all incoming calls and to categorize the, by priorities determined by the general manager and the operations department.

- All reports shall be logged with the date and time for later reference - All reports of outages shall be forwarded to the dispatch team

Dispatching

The individuals listed below are authorized to perform dispatching duties. Dispatching and telephone response will be handled by two individuals working as a team in shifts of 12 hours for the duration of the emergency

Dispatchers

- 1. Randy Sherrill
- 2. Erik Badillo
- 3. Preston Mead
- 4. Ryan Kennedy
- 5. Anthony Gonzales
- 6. Raul Gomez
- 7. Alex Quiroz

Extreme caution should be used during shift change that all crew locations and restoration progress is passed on to the next shift.

I T Recovery

The Inside Operations Manager shall be responsible for the restoration and recovery of all computer systems and lost data. Also included would be fax machines, copiers, printers, the phone system, and internet service.

Communications

The Inside Operations Manager shall designate an employee to arrange for additional cell phones that may be needed for visiting crews or company personnel. A designated employee will also report the emergency information to the public utility commission, Golden Spread Electric, local government agencies and news media.

Securing assistance for repair and reconstruction

The General Manager will be responsible for determining the need for outside assistance. The General Manager or a designee will then contact neighboring cooperatives and /or TEC to request emergency assistance once the magnitude of the damage and the need for personnel and equipment is known.

System maps

The engineering department shall be responsible for up to date maps in appropriate numbers for all visiting crews.

Inventory control

The warehouse personnel shall be responsible for purchasing and issuing all materials used for repair and restoration. It is essential that a record be kept of all issued and purchased material.

Substation equipment

The operations manager shall be responsible for moving and setting up the mobile substation as needed. He is also responsible for maintaining a file containing information giving the location of suitable replacement transformers, trucking companies, and crane services.

Power feeds and switching

The operations manager shall be responsible for informing all crews of the source of feed into each area to be repaired. No line is to be energized without specific authorization from the operation manager or his designee.

Visiting crews and consumer assistance

The Inside Operations Manager or a designee shall be responsible for coordination of lodging, food, fuel and vehicle repairs of visiting crews. In order to advise consumers, they should also be trained in generator safety, finding dry ice, and other services. Charges to the requesting company from the aiding company would be as follows.

- **Labor force**. Charges for labor force shall be accordance with the aiding company's standard practice.
- Equipment. Charges for equipment such as bucket trucks, digger derricks, and other special equipment used by the aiding company, shall be at the reasonable and customary rates at the aiding company's location.

- **Transportation**. The aiding company shall transport needed personnel and equipment by reasonable and customary means and shall charge reasonable and customary rates for such transportation.
- Meals, lodging and other related expenses. Charges for meals, lodging and other expenses related to the provision of aid pursuant to the agreement shall be the reasonable and actual costs incurred by the aiding company.

EVACUATION PLAN

FIRE / GENERAL EVACUATION

Call 9-1-1 as soon as it is safely possible to do so. Give them the type of emergency, the location, and if there are injuries, the number of victims. Give them your name and position in the company.

All employees shall be notified of the emergency with instructions to proceed to the closest unobstructed exit and leave the building in a calm manner. Upon exiting the building, employees shall gather at a safe distance in front of the building. It is the department head's responsibility to account for all personnel and to determine the safest course of action.

A building diagram is to be included in this section of the ERP book with evacuation routes and the locations of all fire extinguishers. Each department head should study the routes and locations in order to be able to direct employees in the event of an evacuation.

For safety, all personnel should be directed UPWIND of the area.

CHEMICAL SPILL

In the event of a chemical spill, always evacuate in such a manner that is away from the spill area. The SDS sheets for all applicable chemicals used in the Coop facilities can be found in a binder labeled SDS in the bookcase in the operations department. However, should there be a chemical spill on an adjacent highway, SDS sheets may not be available. Employees should evacuate upwind of the spill at a safe distance.

TORNADO PLAN

In the event of a tornado approaching the office facility, all employees should proceed to the safe room tornado shelter located in the dispatch room. Department heads will be responsible for a head count to assure that all employees are present. Cell phones should be taken in the event the exits from the shelter become blocked.

12198 HEADQUARTERS FACILITIES

It is necessary to know the location of shut off valves or disconnects. Drawings and diagrams of the current building and grounds showing these shut offs, evacuation routes and the location of all fire extinguishers should be attached and reviewed periodically by all personnel. Access points for emergency services should also be noted.

NATURAL GAS

The gas is supplied by Atmos Energy. Should a problem occur an indoor cutoff valve is located in the northwest corner where the gas enters the building. The gas can also be shut off at the meter located in front of the office as shown on the property diagram. If there is an evacuation, all personnel should evacuate out of the building away from the gas line moving up-wind. Department heads are responsible for a head count to assure all employees are accounted for. The Atmos phone number is listed in the Emergency Contact section of this plan.

ELECTRICITY

The electrical system for the office is from a pad mount transformer the rear of the office. A disconnect is located in the automatic transfer switch label. The electrical system can be shut down by individual circuits utilizing the breakers of disconnect switches. Or, pulling the large main disconnect to the off position will also shut it down this is located in room 167. In the event room 167 cannot be safely entered, the fuses on the transformer bank would need to be opened by qualified personnel.

WATER

To shut off the water, a main disconnect is located in the well house supplying power to the well as shown on the diagram. In the event that the well house cannot be safely entered, the main water valve is located outside on the northeast of the headquarters. **Beware of electrical hazards when dealing with water problems.** In the event of a well problem contact Rita Blanca Groundwater.

COMMUNICATIONS

In order to decrease our vulnerability, the office utilizes cell phone communications as well as land line communications. The capability to call forward to a cellular phone should also be utilized in the event of office phone problems. A request to the phone company to bridge our phone number to another location can be made for emergencies.

The Inside Operations Manager has the ability to re-route computer systems to other internal offices using the CAT-6 cable system.

It is the responsibility of the Inside Operations Manager or designee to advise all applicable agencies of the emergency as well as press releases to the radio, television, and newspapers. All computer banking transactions would have to be postponed or made in person by a designated employee of the Coop.

Rita Blanca maintains print outs of the billing register so as to accommodate dispatching without the use of the computer system.

MAIL and PACKAGES

Although it is highly unlikely that Rita Blanca Electric Coop would experience an anthrax or other viral poison scare, it is important to contain any suspicious packages or substances so that as few people as possible are exposed to any threat. The building should be evacuated and the vehicle that transported the package quarantined. Call 9-1-1.

DISGRUNTLED PERSON

Take appropriate action to defuse the situation and try to be as non-confrontational as possible. Keep the disgruntled person in the lobby behind the access control door. Try to enlist others to help you so you are not in a one on one situation. If you are a witness to a confrontation that is getting out of hand do not hesitate to call for help.

TERRORIST THREAT OR BOMB THREAT

Immediately evacuate the building as is designated in the evacuation plan and call 9-1-1. so that as few people as possible are exposed to any threat. The building should be evacuated and the vehicle that transported the package quarantined. Call 9-1-1.

DISGRUNTLED PERSON

Take appropriate action to defuse the situation and try to be as non-confrontational as possible. Keep the counter of a desk between you and the other person whenever possible. Try to enlist others to help you so you are not in a one on one situation. If you are a witness to a confrontation that is getting out of hand do not hesitate to call for help.

TERRORIST THREAT OR BOMB THREAT

Immediately evacuate the building as is designated in the evacuation plan and call 9-1-1.

DUTIES FOR ALL GROUPS

Operating Group

- Coordination and direction for the operating activities required for the restoration of the transmission and distribution system during the entire period of any and all emergencies:
- Staff the facilities at the Operations Center for the required operational restoration functions.
- Provide central communication and status information updates to the District Managers and Communications Coordinator.
- Determine problems and a course of action to follow.
- Set priorities for switching, patrolling, and restoration.
- Control and direct all instructions for switching and patrolling.
- Determine extent of service interruptions by member count and by area.
- Log all events during the outage.
- Determine manning requirements and call out appropriate personnel.
- Determine the need for outside contractor assistance.
- o Provide Technicians to support relaying SCADA, substation, and radio system problems
- Provide a list of members with special, life-support, or other critical problems.
- Communicate with and identify key account customers for the Operations Group.
- Coordinate and assemble phone answerers as requested.
- Maintain function of offices with reduced staff during normal business hours.
- Continually train personnel in the outage management program and the capabilities of the phone answering system.

Dispatchers or System Operating Personnel

- In the event of a major electric system outage or emergency (one in which a substation or major feeder is interrupted for more than a few minutes in a heavily populated area or the same condition in a very rural area that is likely to last several hours), the Engineering Representative should be notified immediately. If advisable, then notify the Communications Representative, and the General Manager where a decision will be made to either contact the news media or wait for an inquiry. Depending on the nature of the situation, the Communications Representative may decide to call in the Communications Specialist to write a report (take photos, etc.) for either a news release or member advisory in the Texas Coop Power or by special letter.
- Responsible for determining proper course of action to restore transmission and distribution systems to operating condition.
- Responsible for determining the priority for restoration.
- Determines the level of the emergency.
- Insures all operating personnel are functioning as prescribed.
- Secures outside contract assistance if necessary.
- o Determine and execute relief schedules during extended service restoration.
- Coordinate, in the field, the execution of the power restoration plan by maximizing the available crews, equipment, and material.
- Establish a crew rotation plan when restoration of the system is exceeding 16 hours.

 $\circ~$ Meet daily with the Operations group to assist in the development of the Restoration Plan for the following day.

Accounting Representative

 Notify the Communications Representative of rate and/or billing matters or other situations that could invite media attention or need media or member advisories. Act as official spokesman in the absence of both the Communications Representative and the General Manager on matters relating to his department.

Office Personnel

- Coordinate and dispatch all switching and patrol operations between the field and the Operating Group.
- o Monitor SCADA System.
- Report information about employees or the operations and activities of the Cooperative to the dispatch personnel.
- Maintain a list of employees' phone numbers and addresses. Call-out personnel upon the request of the Operation Manager.
- Track working time on all service and construction crews.
- Answer member outage calls courteously, calmly and professionally.
- Collect complete information using outage management program.
- Call customers back when service is restored.
- Apologize for the inconvenience and give the correct time.
- Includes any and/or all remaining employees of the Cooperative. Their duties will be assigned by the Manager (on duty). Their duties will vary from day-to-day and will address any special needs of the membership, cooperative, or the workforce.

Engineering Personnel

- Sort outage reports and determine location and possible cause of the outage.
- Determine location of protective devices and switches involved for the restoration of power and recommend a course of action.
- Identify each problem area on the system map.
- Track the location of personnel in the field and post on the map.

Field Crews

- Keep Dispatchers and Engineering Representative fully informed of any situation that would invite media attention. In situations where the media is on location, cooperate fully to the extent that neither safety nor efficiency of work is impaired. Answer all questions as briefly as possible without speculating.
- Repair, sectionalize, or restore all damaged transmission and distribution systems to acceptable operating condition during the emergency
- Provide adequate personnel and equipment to repair or sectionalize damaged equipment.
- Provide personnel for patrolling circuits.
- Assist in the determination of severity and extent of damage to the transmission and distribution systems.
- Coordinate material requirements with Engineering to the material supplier.

- Periodically review and determine the best utilization of equipment and personnel.
- Request mechanic personnel for emergency equipment and vehicular repair as needed.

Member Service Group

- Provide trained and courteous personnel for answering member outage calls and verifying power restoration to members.
- Assist with the prioritizing of outage calls with regard to special needs or critical loads.
- Provide members with additional information with respect to anticipated outage time and the extent of the damage as supplied by the Communication Officer's publications.
- Confirm restoration of power by follow-up phone call.
- Coordinate news releases and public service announcements with the General Manager. Establish and maintain information flow to the membership and the employee service group.
- Responsible for preparing news releases, public service announcements, and other pertinent information as may be deemed necessary for general instructions, safety, and wellbeing of the membership.
- Updates the Board of Directors on the current situation as advised by the Operations Manager and General Manager. Issue updated information on a timely basis.
- Review and approve all news and press releases and advise the General Manager accordingly. Serve as the official spokesperson for the Cooperative in answering inquiries and making position statements. Confer with appropriate department managers on matters requiring either media response or news releases in order to assure accuracy of reporting.

ENGINEERING and OPERATIONS

- 1. Engineering departments should develop and submit to management and boards of directors a policy concerning specific pole and conductor sizes and other items to be used in a "Standard Construction Policy." Co-op staking sheets and work plans may be used as examples to show proof of a "replacement standard" being in place prior to the occurrence of a natural disaster.
- 2. Engineering and operations personnel should note the date and time the first outage

occurred due to the disaster, and the date and time the last consumer's electricity is restored.

- 3. The engineering/operations department should solicit at least three (3) bids for permanent repair work to be done, preferably before the conclusion of the 70-hour Emergency Protective Measures period. Bids from contractors must be received, along with price sheets for storm labor and equipment. It is recommended that bids be made on a per-unit basis, rather than hourly. However, if billing is hourly, proof must be shown that the contractor was supervised by the cooperative, complete with daily notes and documentation.
- 4. It is strongly recommended that additional engineering resources be arranged to assist in the daily development of staking sheets, material sheets, and work order information. This will allow the staking department to stay ahead of construction crews, and provides for an orderly flow of necessary and vital information to other key departments.
- 5. Member donated items, such as food, services and labor, must be well documented. It may be necessary for the member or group providing these items to sign an affidavit listing the cost of donated items, or for an invoice to be provided. This could then be included in Administrative Expense by the cooperative.
- 6. Prepare staking sheets as soon as possible for work to be done. Make sure that all permanent work has a staking sheet documenting the completed work. The labor for making the staking sheets should be included in the work order and is FEMA reimbursable (Category F). The labor involved in looking for and estimating damage to the system **is not** reimbursable **except** as Administrative Expense.
- 7. Damage surveys: It is strongly recommended that, if possible, co-op personnel resist the urge to send all available human resources into the field to assist in the repair of damage. Instead, the following is advised:
 - a. Send several experienced field personnel on a 'Fast Survey' of the areas in which damage is suspected. Use enough personnel to drive through the damaged area(s) in one day or less.
 - b. Initially, some lineman may need to be utilized to patrol line rather than to repair it. The Fast Survey is designed to rapidly determine the extent of damage throughout the coops'

system. It will allow for better decision-making concerning crews, materials and equipment.

c. Damage reports from survey personnel should list the location, approximate length (1 mile, etc.) of damage in area, the type of damaged pole line, i.e., "south side of section

23, T15N, R1W – One mile of 3 phase line, 1/0 conductor on 45-foot, Class 4 poles is down."

- d. Collect all reports during the survey at the dispatch center or Emergency Operations Center and draw the damaged locations on a Key Map. Start a database using Excel or Access software to log each of the damage reports by line section or map location number. This will help the engineering and operations departments document the scope and location of the damage for later accounting purposes.
- e. If possible, allow survey teams to use cell phones to report damage; designate someone to log these reports onto the Key Map and also log the reports into the database. This is also the time to note the locations of any lines that may be blocking major roadways, since main roads will need to be cleared quickly.
- f. Do not allow survey teams to stop and draw staking sheets or to make detailed material sheets during the initial Fast Survey. The goal is to rapidly drive through the damage area(s) to determine the extent and locations of damage. The information gathered will then be used to determine crew and material requirements. The earlier the co-op gets a handle on the extent of the damage, the earlier proper staking sheets can be developed for known damage locations.
- 8. Beginning repairs: Concentrate on the areas that will allow the cooperative to get power restored to the most consumers with the least amount of work, and to critical loads, if any. Begin work at substations and work main feeder lines outward from that point. If damage is extensive in an area, staking technicians may need to be sent ahead of repair crews in order to draw staking sheets and set stakes. Identify in advance all feeder lines and critical loads.
- 9. Some lines can be repaired with little or no staking; others will have to be staked as if they are new construction. In the case of strong tornadoes or hurricanes, the pole line may be completely obliterated, with no poles left for reference points. In these cases, the line may have to be completely re-staked prior to reconstruction.
- 10. Ice storms, on the other hand, may break poles down, but type of framing and original hole locations will still be known. Repair crews can reset new poles in these instances without staking sheets or stakes, unless the damage involves Codes and Standards changes, which may necessitate re-staking due to changes in ruling spans being made for proper clearance purposes.

- 11. Quick staking sheet drawings listing pole framing requirements are very helpful for repair crews, but in ice storms, with a visible pole line in place, it may not be necessary for staking technicians to 'wheel off' spans or set stakes. Whether damage is caused by an ice storm, hurricane or tornado, staking teams will have to coordinate with repair crews, and vice-versa.
- 12. Inspect and document the repairs: Once repairs are underway, use engineering personnel to inspect completed repair locations. Consider using consultants or additional engineering help from neighboring co-ops. Engineering teams will have to look for all poles and construction units that were set or replaced during the disaster. Some repairs may have been made without benefit of written records; the purpose of the engineering follow-up inspection is to further document repair locations and materials used.
- 13. The second purpose of the inspection is similar to work order inspections. List the material units used at each damaged pole location, noting any cleanup or corrections that may be required in order to bring the line into compliance with current co-op, RUS and NESC Codes and Standards.
- 14. For Category F, Utility (permanent repairs), it is extremely important to have in place boardapproved co-op design standards and staking tables. This customized "Standard Construction Policy" should spell out standard pole heights, conductor sizes and ruling spans to be used at the cooperative, and should be utilized every day by co-op staking personnel.
- 15. The third purpose of the inspection is to have engineers check surrounding areas for damaged lines possibly overlooked during the initial Fast Survey. Some lines may serve idle or seasonal services and should be closely evaluated for rebuild or retirement.
- 16. Inspection notes must be detailed and listed by map location number. The notes should be entered into a database for easy retrieval and subsequent evaluation. Documentation of all work performed during the disaster is a major task but is absolutely critical if a cooperative expects to qualify and receive FEMA reimbursement. These records will be used to ensure the system is returned to current Codes and Standards, and to help document material and labor costs associated with all reconstruction efforts.
- 17. Contracts from contractors: The co-op must have in place or be prepared to receive from at least three (3) different sources, bids for permanent repairs. This is preferable during the 70hour Emergency Protective Measures period immediately following the disaster. During the initial emergency period, if a contract has not been signed by the contractor, any record of contact, arrival times, and/or anything discussed by phone or in person with the contractor should be documented. OIG auditors may allow these costs from contractors, but only if the coop proves such verbal agreement existed via documentation.

- 18. Contractors unfamiliar with local co-op service areas will require supervision and instruction by local co-op employees. It is suggested that trained and experienced employees be used to supervise these contractor crews, such as those employees from the co-op's staking department, marketing department, or key accounts department.
- 19. If predicted storms appear to be extremely destructive in nature (forecasted ice storms, hurricanes, or tornado outbreaks), consider creating work orders in advance to charge all time and materials to.
- 20. If possible and if needed, use in-house contractors and any of their extra crews before calling in or bidding other contract crews. In-house crews are contractors the cooperative presently employs for contract construction work. Make sure the in-house contractor has their emergency storm repair rates on file with the cooperative, as well as rates for permanent repairs.
- 21. Keep <u>all</u> receipts during the event, in case the storm or event is later declared a federal disaster.
- 22. Work Orders: Some co-ops prefer to make one work order per disaster. Counties (or parishes, etc.) are designated with map location numbers noted on all time sheets, staking sheets and material sheets.
- 23. On-file contracts: Some co-ops retain contracts and keep them on file from contractors.

Included in those contracts is a sheet pertaining to emergency storm work. However, it is usually a good practice to call in contractors within the first 24 to 36 hours of the disaster if damage warrants their assistance. Again, bids for repairs should be let during the 70-hour Emergency Protective Measures period, and before permanent repairs begin.

- 24. In-house contractors: These are contractors already under contract with the cooperative and are usually already familiar with the co-op's crews and service area. These contractors may or may not need the direct supervision of a cooperative employee, depending upon their knowledge of the co-op's system, its substations, main feeder circuits, critical loads, etc.
- 25. Rights-Of-Way (R-O-W) contractors: Some co-ops maintain rights-of-way contractors on an annual basis. These R-O-W contractors can be very beneficial during a disaster, especially if needed for debris removal. These contractors may still need to be supervised by co-op personnel and will need to provide complete details of their daily work to the affected cooperative, preferably submitting detailed invoices on a weekly basis.
- 26. Co-op R-O-W supervisors can be very helpful in preparing damage report maps, locations of work to be performed, and in preparing transformer or pole replacement reports. Because of their experience, some co-ops may choose to make these R-O-W supervisors their disaster Project Officers. This will obviously vary from co-op to co-op.

- 27. Notify all other departments of work orders assigned to the disaster. Other departments should also be informed of activity codes that may be assigned. Coordinate specifically with the accounting department to ensure that copies of all time sheets, invoices, checks and cash receipts are obtained. Keep a working file that is designated by work order number, FEMA Category A through F, and location (map number, county, etc.).
- 28. Utilize marketing, public relations, or key accounts employees, based on their experience and level of training, to deliver food and/or materials to crews in the field. Ask them to keep all receipts and detailed logs of material and/or equipment delivered.
- 29. Arrange for fuel (diesel, gas, etc.) from suppliers throughout the co-op's service area. Have a contingency plan to deliver properly-sized backup generators to these fuel suppliers in case their pumps have no electricity due to the disaster.
- 30. Have all contactors sign a simple contract stating that they are indeed contractors and that they agree to "hold harmless" the cooperative from liability, worker's compensation claims, damage to hotel/motel rooms, and damage to public/private property due to their crews' negligence. Include in this agreement that weekly invoicing for work performed by the contractor is expected by the cooperative.
- 31. Engineering firms may need to be used to prepare bid specifications. Utilize their services during a disaster situation. This will also help in allowing the cooperative's in-house engineering and staking department personnel to stay ahead of contractors and construction crews with staking and material sheets, <u>which is absolutely necessary</u>.
- 32. As soon as possible during the disaster, utilize public relations personnel, part-time employees, or possibly retirees to take both still pictures and videos of the damage. This serves two purposes: **1.**) It makes a permanent record of the amount of ice that was on the line or the level of devastation caused by a hurricane or tornado, thus making damage repair estimates more realistic; and, **2.**) Photos and videos can be used to show FEMA and/or state emergency management personnel conditions that caused the damage to the cooperative's system. Remember that FEMA and/or state emergency management personnel often do not show up at the cooperative until several days (or weeks) have passed, so these photos and videos can play a very important role in verifying and validating damage assessments and the necessary levels of permanent repairs to be stipulated in PWs.
- 33. <u>Any verbal contract or agreement</u> between contractors and cooperative personnel should be written down and recorded. A checklist should be made by the engineering/operations departments of documentation to be required from all contract crews. This documentation will serve as backup for review of billing invoices submitted by contractors. If documentation is not present and does not backup an invoice submitted by the contractor, the contractor should be required to find and submit the proper documents before payment is made to the contractor by the cooperative.

- 34. Contractors should be required to submit weekly invoices, including time sheets, detailing individual crew member names, where they worked, hours worked, equipment used, etc., and listing costs for pieces of equipment used in both the emergency restoration and permanent repair efforts.
- 35. Engineering/operations personnel should be prepared to document and explain the process used by the local cooperative to select work crews, whether from other co-ops (through the Mutual Aid Plan) or from contract construction crews. An 'Action Plan' detailing how the co-op selected contractors and why specific equipment was requested for the emergency restoration and permanent repairs process should also be developed.

ACCOUNTING ISSUES

The stability of the electric utility industry makes us slightly less susceptible to business interruption when compared to businesses that will likely lose significant market share if they cannot deliver their products and services in a competitive environment. However, it is important to plan for recovery from a large-scale disaster. Think about the following questions in planning for the cooperative's business contingency:

How will your cooperative continue to collect payments from walk-in consumers if your physical location has been destroyed?

How strong are your relationships with your money lenders and vendors?

What type of physical security do you need to have in place if you are operating from a temporary location?

Should you have backup banking arrangements in place prior to any type of disaster? In the event of an emergency, the following accounting functions are important to the continuity of service.

- Accounts payable Accounts receivable
- Banking

 Payroll

 Availability of short-term cash

 Records and recordkeeping

 Security
- The following accounting functions are necessary for the smooth operation of the business during normal operating conditions and/or emergency conditions:
- Maintenance of accounting records. O Safeguarding of accounting records. O Noninterruption of accounting functions, including payroll time sheets and receipt tracking.
- Establishment of lines of credit with current / new vendors, CFC, RUS and/or company Bank.
- Contact with banking institutions, insurance carriers and vendors.
- 1. Project Worksheets (PWs) should specify quantifiable and verifiable quantities of work to be done whenever possible. Accounting personnel should be prepared to explain any cost over-runs or the reasons for higher costs than were estimated. Notify the state emergency management office immediately if an over-run is anticipated. The progress of a PW should be tracked constantly and may require the use of a full-time accounting manager.
- 2. On the first day of the disaster, implement activity codes for tracking work by location and by type of work, i.e., rights-of-way, emergency restoration, permanent repair, etc. These

activity codes must be used by all employees on their time sheet and the accountants must use them on contractor invoices.

- 3. Maintain close contact with the engineering department regarding work order numbers assigned, or to be assigned, to the disaster. To expedite information gathering, activity codes by county may be assigned to work project.
- 4. The co-op should keep a log of all contract crews hired during the disaster. The log should include company names, their hotel / motel expenses, and meal expenses, with crew members' names and their local accommodations.
- 5. Contractors should be made responsible for maintaining their expense records and for submitting invoices to the cooperative on a weekly basis. In addition to crew names on receipts, it would be helpful to list the crews' weekly work location by county or map number. Also, if the time and expenses are related to time spent by the contractor driving to the cooperative, the contractor should so specify on the invoice or receipt. If receipts are not included with invoices, then no payments should be made by the cooperative until such time as missing receipts are supplied or the charge is removed from the billing.
- 6. Assign the PW numbers to all invoices. Prepare a spreadsheet that summarizes the PWs, including the invoices, check numbers, vendor names, and amounts. Make copies of all documents and place with the spreadsheet. Make copies of all spreadsheets that are created and place them on a disk or flash drive and file them in the cooperative's vault.
- 7. Keep all receipts from the co-op crews; consider utilizing credit cards for supervisors in order to better maintain records from the disaster.
- 8. Mark copies of all time sheets, invoices, checks and cash receipts as they are obtained.

Risk Mitigation Efforts

Steps should be taken to minimize the losses to the cooperative in the event the accounting functions are affected by an emergency situation. It is strongly encouraged that the following mitigation efforts be taken to prepare for possible emergency situations:

- Designate / appoint chain of command for management to assume control of the site. □ Assess neighboring cooperatives for "best fit" of accounting practices. It may be necessary to use them as a contingency site until permanent business location can be restored.
- Create and keep a contact list of banking institutions, insurance carriers, vendors, etc. in a secure offsite location.
- Establish rapport with a secondary financial institution to reduce vulnerability.
- Consider off-site storage of backup records.

Short-Term Recovery Efforts

- Short-term actions to consider following an emergency involving loss of accounting functions include:
- Reestablish communications.
- Contact insurance carrier.
- Reestablish central information systems and then desktop systems as needed.
- If needed, use central billing system provider to estimate and send customers' bills.
- Ensure payroll is quickly operational if no ACH (Automated Clearing House), write checks by hand.
- Secure short-term loans as necessary and communicate with vendors on lines of credit.
- Establish credit agreements and accounts.

- Provide for ongoing local payables (motels, restaurants, gas stations, suppliers).
- Confirm local banking arrangements are operational.
- Use credit cards as necessary to defer cash movement to the next month or longer.
- Utilize neighboring cooperatives, as necessary.
- Use emergency bill stuffers / messages to communicate with members.
- Provide for receipt tracking, payroll time sheets, etc.

COMMUNICATIONS and PUBLIC RELATIONS

- The types of communications important to normal operating conditions are:
 - Telecommunications equipment and handsets Facsimile equipment
 - Radios Cell phones
 - Email and Internet
- The following items are strongly dependent on communications for normal operating conditions and during emergency conditions:
 - Public and member communications through print, radio or television. O Contact with key officials in local, state and/or federal government, such as disaster relief personnel, law enforcement and fire department.
 - Internal communications and coordination of recovery efforts. Contact with employees and their families.
 - Contact with vendors and contractors.
- 1. Communications, public relations, marketing and key accounts personnel can be utilized for many projects during a disaster. Many duties these departments can carry out may be logistical in nature; that is, personnel may be used to coordinate the delivery of food, equipment, materials and meals, all in addition to their normal duties. Because of their varied experiences, these employees may also assist other departments as needed, including the cooperative's emergency operations center, customer service center, warehouse, temporary warehouse operations, staking, and engineering/operations.
- 2. Communications personnel should assist management in drafting letters (sample copies included herein) to the cooperative's membership, detailing the extent of the disaster and its impact on both the membership and the co-op. Such letters should be sent to all members in damaged areas and include vital data such as the projected length of the outage, and phone numbers for service organizations such as Red Cross, local emergency shelters (churches, schools, etc.), and contact numbers for state emergency management and FEMA.
- 3. Public relations, marketing, and key accounts personnel may be able to assist in locating lodging for contractors and co-op crews that will be arriving at the cooperative headquarters within hours. These same departments can also contact area cafes, restaurants, and community service organizations concerning the preparation of meals and laundry services for repair crews. Flat rates for these types of services can often be negotiated with business owners.
- 4. Always communicate honestly and openly with the co-op membership and media. Always estimate outage duration on the high side. And, if you don't know an answer to member or media questions, say so! <u>Most importantly</u>, <u>always tell the truth</u>!

- 5. Write and submit press releases (via e-mail) to local newspapers as often as their print schedules allow. Send daily e-mail disaster updates to your cooperative's Statewide Association, local radio and/or television stations, and other information dispensing resources that can keep the cooperative membership and general public informed about all progress being made in the power restoration effort. Mailing weekly letters to consumers in damaged areas is strongly advised, since they will not have electricity and thus have limited access to radio/TV broadcasts.
- 6. Post daily updates on co-op phone message systems, at post offices, restaurants, and community centers.
- 7. Assist the engineering/operations departments by documenting the extent of the storm or disaster using both still photographs and videos. FEMA and state emergency management officials may not visit the co-op service area for several days or weeks, so having photos and videos of actual damage as it occurred is helpful. Date and document the times and places that photos and videos were taken.
- 8. Date, document, and describe all work performed by office personnel if it relates to field work, i.e., meal delivery, equipment and materials delivery, materials management at warehouse or satellite warehouse(s), or other activities directly relevant to field work.
- 9. If members or others donate food, services or labor, ask them to provide receipts or invoices for the items, or ask that they sign an affidavit listing the cost or value of items being provided for use by the cooperative. This may be credited toward the cooperative's Administrative Expense.

Risk Mitigation Efforts

Steps should be taken to minimize the losses to the cooperative if communication equipment may be affected by an emergency situation. It is strongly encouraged that the following mitigation efforts be taken to prepare for possible emergency situations

- Consider keeping spare radio transmitter on hand and maintain it offsite.
- Use "Talk-Around" truck to truck radios when necessary
- Provide a direct wired telephone that can be used without power
- Assess your telecommunications provider's ability to respond to various disasters
- Develop an ongoing relationship with your local emergency management agency (EMA)
- Create and keep a contact list available of important community and emergency management personnel
- Provide a designated company spokesperson education on how to interface with the media
- Establish designated and backup internal official media spokesperson that will deliver the same message when asked questions.
- Develop a canned press release
- Designate / appoint a chain of command for management to assume control of the site.

Information Systems and Paper Records

- Nearly as important as loss of personnel is protecting against the loss of electronic data and paper files. Think about the following questions in planning for the cooperative's business contingency:
- What type of backup system is currently in place to restore business information to current operating conditions?
- Have all critical systems been backed up and tested for accuracy?

- Have all critical hard files (paper, etc.) been duplicated and stored in remote locations to protect against loss?
- What type of information systems are in place?
- Can our company rely on other cooperatives and/or vendors to help us restore our data quickly?
- Computers, hardware and data important to normal operating conditions are:
 Mainframe, server, network systems
- PCs
- Paper (shared or individual)
- Software licenses
- The following items are strongly dependent on the computers, hardware and data for normal operating conditions and during emergency conditions:
 - Maintenance of accounts payable and receivable, payroll, engineering, operations and inventory records.
 - Connectivity between offices (other co-ops).
 - Secure storage of software licenses.

Office / Office Equipment / Inventory

- Loss of a building or buildings, inability to access your work place, or loss of office equipment and inventory can cause severe consequences to the business. Think about the following questions in planning for the cooperative's business contingency:
- Where will your cooperative temporarily relocate if your building and grounds are inaccessible or destroyed?
- What office equipment (computers, communications, etc.) does your cooperative need to continue to operate effectively?
- Where will you realistically obtain inventory items necessary to continue to function for various lengths of time?
- Items essential to the normal operation of the physical location are:
 - Office and warehouse facilities
 - Equipment and vehicles
 - o Tools
 - Communication
 - Computer system(s)
 - o Fuel
 - \circ Housing
 - Utilities
 - \circ Security
- The following items are strongly dependent on the physical location for normal operating conditions and during emergency conditions:
- Public and member communications through print, radio or television.
- Contact with key officials in local, state and/or federal government, such as disaster relief personnel, EPA, law enforcement and fire department.
- Internal communications and coordination of recovery efforts.
- Contact with employees and their families.
- Contact with vendors and contractors.
- Dispatching of personnel and equipment.
- Storage and maintenance of equipment and vehicles such as digger derricks, aerial devices, stringing equipment, small vehicles, forklifts, etc.
- Storage and inventory of tools such as heavy presses, hand tools, personal protective equipment, cover-up and other protective devices.
- Storage and dispensing of gasoline, diesel fuel and LP gas for vehicles and equipment.
- Recording and maintaining outage information, automated meter reading equipment Turtle systems), system maps.
- Coordination of co-op and outside crews, including staging, area, assignments, temporary housing and meals.
- Affirming adequate shelter for the families of co-op employees.
- Safeguarding of assets including building, equipment and inventory.
- Non-interruption of utilities for both co-op property and members, if applicable, including electric, gas, propane, water and telephone.
- General maintenance of office and warehouse facilities including structural integrity, sanitary facilities (restrooms, port-a-pots, washrooms/showers), trash disposal (waste, scrap material, hazardous materials, etc.).

Personnel / Human Resources

The issue of personnel is a major variable in disaster recovery. How many would there be available for the recovery efforts given different types of emergencies? Think about the following questions in planning for the cooperative's business contingency:

- Will the employees be able to function for an extended period of time?
- Are the employees' homes and families directly affected by loss of personal property and shelter?
- Will new employees have to be hired to fill the spots left by injured or deceased employees?
- Can key employees be borrowed from neighboring cooperatives to keep the cooperative operational?
- Should the cooperative engage in cross-training and job sharing to mitigate potential losses?
- In the event of an emergency and the potential for loss of personnel, the following items are important to the continuity of service:

 Safety of employees and their families o
 Preparation for any loss of personnel o
 Prioritize business functions o
 Board notification
 O Action plans developed

The following items are strongly dependent to the smooth operation of the business during normal operating conditions and /or emergency conditions:

- Complete job descriptions including documented, detailed procedures on how to do each job (similar to JSA).
- Specific "key" positions defined and cross training / job sharing for these positions is ensured.
- Maintain a good working relationship with contractor, municipals, retired employees and other cooperatives.

 Geta Key personnel are insured through the company's policy.
- Legal issues involving insurance, workers' compensation etc., in regards to permanent and temporary employees, have been addressed with corporate attorney.
- Identification of a grief counselor.

Risk Mitigation Efforts

Steps should be taken to minimize the potential for personnel losses in the event of an emergency. It is strongly encouraged that the following mitigation efforts be taken to prepare for possible emergency situations:

- Designate / appoint chain of command for management to assume control of the site.
- Keep job descriptions updated with essential functions.
- Encourage cross training / job sharing among internal employees and develop relationships with contractors, area municipals, and other cooperatives.
- Maintain an inventory of skills for employees, contractors, retirees, temps, etc. Include normal job duties as well as functions they can perform outside those normal duties.
- Establish an emergency action plan and review annually making special note of any changes.
- Annually practice evacuation drill and shelter drill.
- Develop a list of possible vendors for potential outsourcing of certain work (temporary or permanent).

• Establish a hierarchy of employee responsibility for hiring both temporary and permanent help.

Short Term Recovery Efforts

Short term actions to consider during an emergency involving loss of personnel include:

- Follow chain of command based on employee loss and business function priorities. Use outside coordination as necessary.
- Initiate employee assistance program for employees and families
- External communications keep public message consistent, defer media to TEC personnel if it is too much to handle
- Contact TEC staff for safety coordination and assistance
- Provide medical care, as needed
- Adjust / stagger employees working hours to increase availability of cooperatives services to members and vendors
- Use contractors
- Ask assistance from other Co-ops.
- Review emergency work plan for employee help
- Provide personnel and board members with status briefings to keep them apprised of situations
- Contract with retirees and / or employees' family members to assist with routine business tasks
- · Borrow employees from other cooperatives, TEC, software provider or local business
- Assist employees and their families as needed.

Warehouse / Pole Yard / Fleet

- The core function is to keep housing and systems in place so that employees have a place to work. It is important to consider that a large-scale disaster can cripple the entire community, so relying public buildings and community services may not be an option. Think about the following questions in planning for the cooperative's business contingency: \Box Are the facilities and infrastructure of the cooperative itself damaged?
- What would the cooperative do if there is no longer a physical facility to operate from and the infrastructure has been severely damaged or destroyed?

Items essential to the normal operation of the warehouse and/or pole yard are:

- Warehouse facilities
- Equipment and vehicles
- Materials
- Tools
- Fuel
- Utilities
- Security
- The following items are strongly dependent on the warehouse and pole yard for normal operating conditions and during emergency conditions:
- Storage and maintenance of equipment and vehicles such as digger derricks, aerial devices, stringing equipment, small vehicles, forklifts, etc.
- Storage and inventory of materials such as poles, cross arms, transformers, wire, etc.
- Storage and inventory of tools such as heavy presses, hand tools, personal protective equipment, cover-up and other protective devices.
- Storage and dispensing of gasoline, diesel fuel and LP gas for vehicles and equipment.
- Safeguarding of assets including building, equipment and inventory.
- Non-interruption of utilities for both co-op property and members, if applicable, including electric, gas, propane, water and telephone.
- General maintenance of warehouse facilities including structural integrity, sanitary facilities (restrooms, port-a-pots, washrooms/showers), trash disposal (waste, scrap material, hazardous materials, etc.).

PURCHASING and MATERIALS MANAGEMENT

- 1. Material issue sheets <u>are critical</u> for tracking material from warehouse (or in instances where temporary field warehouses are set up) to the field. Every effort should be made to track all material received from suppliers and all material used by contractors and co-op crews in the emergency restoration and permanent repair efforts.
- 2. The material issue sheet should include, at minimum, where (location) material is used, when it was used (day, date), and quantities of construction units specified on the work order.
- 3. If a picking list system is commonly used on work orders, strongly consider switching to staking sheets in order to capitalize material. If material issue sheets are to be used, there must be tickets for <u>all</u> material for which FEMA reimbursement is expected.
- 4. Material should be ordered immediately, or as soon after initial Fast Surveys of damage are completed. Fast Surveys should give warehouse and materials management employees enough information to determine <u>initial orders</u> of poles, cross arms, conductor, splices, and other construction hardware. Utilize the Standard Construction Policy design criteria developed by the cooperative <u>before</u> the disaster so approximate types and quantities of material will be known for ordering.
- 5. Arrange for material delivery points as near as possible to damaged areas. If temporary field warehouses are utilized, <u>it is critical that all material received at those locations be accounted for, and material issued from these field warehouses be precisely tracked</u>, preferably using material issue sheets. It is recommended that a warehouseman or materials management clerk be stationed at each temporary warehouse or satellite facility in order to daily check in material received and check out material to be used by construction crews.
- 6. Some vendors will contract with a cooperative to furnish trailers loaded with materials necessary for rebuilding or repairing lines during a disaster. The vendor is responsible for an inventory of all items, allows removal of items from the trailer only upon completion of material issue sheets, and conducts a follow-up inventory for reconciliation. If this method is employed by the affected cooperative, control must be exercised over material received and checked out. Documentation must be in place to record where (location, by map number and county or parish) the material was used and what construction units were put in place.
- 7. Consider utilizing warehouse or materials management employees from other cooperatives early in the disaster.

- 8. Ask for vehicle inventory sheets from all contractors and other co-op crews before they are allowed to commence work. Carefully monitor material that is issued and inventory these same vehicles before crews depart for home at the end of their contract term or period of work.
- 9. Try to run all material through the material issue system if possible. Quantities, dates, and locations are much easier to track this way.
- 10. Should additional material need to be purchased, Rita Blanca Electric Cooperative maintains a diverse purchasing system so as to have several outlets for material and not become dependent on any one source. The current venders used are:

T.E.C.	Poles and material	877-868-8610
Mike Zaccardo	1	806-773-1371
Techline	Material	806-655-2299
Troy Holemar	1	806-676-8230
Anixter	Material	806-747-3128
Zane Majors		806-786-6691
Wesco	Material	806-379-8493
Kolter Newton	1	806-678-5008
Border States	Material	806-765-5741
Martin Huerta		806-549-1730

- 11. Carefully record any and all material coming in from the field that is to be considered salvage. This is required for reconciliation of co-op material records.
- 12. Accurate record keeping for purchasing, issuing, and returning of material is also the responsibility of the warehouseman.

EMERGENCY OPERATIONS CENTERS

- 1. For the purposes of this manual, Emergency Operations Centers shall be defined as cooperative dispatch centers or other emergency communications centers used by the cooperative in times of disaster.
- 2. Emergency Operations Centers should be equipped with standby generators to provide for continuous phone and radio communications during emergency disaster conditions. Such centers should also have the capability and capacity to add extra phone lines to handle additional calls from consumers.

- 3. While cell phones are affordable, convenient and efficient, it should be noted that the use of cell phones during certain disaster conditions might be severely limited or impaired. This is especially true during ice storms and hurricanes, when cellular transmission towers are often rendered virtually useless due to ice of wind damage. In emergencies such as tornadoes, high volume calling often causes congestion, making cell phone calling ineffective. However, if cellular towers are unaffected by the disaster, cell phones are an effective tool that can be utilized by initial Fast Survey crews to report system damage estimates to the co-op.
- 4. Computerized weather monitoring software programs are highly recommended for use in co-op Emergency Operations Centers. They may also be available through other agencies such as subscription services.

The only FEMA reimbursable expense for phone support is the overtime for full time hourly employees in the Emergency Operations Center. Part time, temporary, or contract phone support personnel are eligible for reimbursement for both regular and overtime hours

SUBSTATIONS

It is the responsibility of the operations manager to coordinate all issues that may arise having to do with substations.

A list of both trucking companies and crane services can be found in the section dealing with Fleet Management.

North American Electric Reliability Council (NERC) presently maintains a voluntary spare transformer database where utilities can submit requests for transformers to temporarily replace damaged transformers in cases of emergency until a replacement can be delivered.

During an extreme emergency, Rita Blanca Electric does possess the ability to shuffle 115 KV primary transformers to restore service using a spare transformer in the Snead substation. For 33 KV or 69 KV Rita Blanca Electric owns a 3750 KVA mobile substation that can be moved to any location. The operations manager is responsible for securing the permits to move the mobile sub as well as the safe installation of the mobile sub.

Rita Blanca Electric maintains a good inventory of spare regulators, reclosers, fuses, and other substation parts that could suffer damage.

Emergency repairs of damaged equipment can be accomplished through either of the following:

T.E.C Transformer Division	1-877-868-8610 Extension 306
Soloman Electric	1-800-234-2867 Extension 123
Tri-Point Substations	1-806-777-8125

It is also possible for Rita Blanca Electric to re-feed the majority of our substations from alternate substations in order to restore service while repairs are being made.

Environmental Issues

- 1. Debris removal: The clearance, removal and / or disposal of items such as trees, sand, gravel, building components, wreckage, vehicles, and personal property. Debris removal is necessary to:
 - a. Eliminate an immediate threat to lives, public health and safety
 - b. Eliminate immediate threats of significant damages to improved public or private property
 - c. Ensure the economic recovery of the affected community
- 2. Examples of debris removal activities:
 - a. Debris removal from a street or highway to allow safe passage of emergency vehicles
 - b. Debris removal from public property to eliminate health and safety hazards, such as the threat of fire.
- 3. Examples of ineligible debris removal activities:
 - a. Removal of debris, such as tree limbs and trunks, from natural (unimproved) wilderness area;
 - b. Removal of pre-disaster sediment from engineered channels:
 - c. Removal of debris from a natural channel unless the debris poses an immediate threat of flooding to improved property.
- 4. Debris removal from private property is generally not done because it is the property owner's responsibility. If property owners move the disaster-related debris to a public right of way, the local government may be reimbursed for curbside pick and disposal.
- 5. It is recommended that contract crews or in-house right-of-way contract crews be used for debris removal activities following a disaster.
- 6. If contract crews are to be used, at least three bids should be let for the work to be done.
- 7. For brush and tree debris removal, it is recommended that contracts be arranged on a footage basis, with co-op personnel mapping and verifying the measurement of all footage estimates.
- 8. The cooperative should maintain and keep readily available copies of their Release of Liability for Broken Poles form. The cooperative should keep a copy of the signed release form for all property owners where poles were left on private property.
- 9. Burning of damaged utility poles is <u>prohibited</u>. If poles are to be chipped, the chips <u>are</u> <u>not to be used for mulch and bedding</u>. Chipped utility poles must be disposed of at a permitted Subtitle D landfill.

- a. Reuse: The cooperative may choose to contact the landowner where the damaged utility poles are located and offer the poles to them. If this is the case, and the landowner accepts the poles, then the poles are not subject to Department of Environmental Quality regulation.
- b. The cooperative may transport the damaged poles to one of their facilities (pole yard) and offer the poles for reuse. Poles taken for reuse do not fall under DEQ jurisdiction or regulation. A signed liability release form is recommended.
 - c. The cooperative may transport the damaged poles to a site approved by the Emergency Disposal Site Evaluation and Registry procedure to stockpile and offer poles for reuse from the site. The Emergency Disposal Site Evaluation and Registry form must be completed, submitted and approved before a disposal site is used.
- d. Disposal The preferred method of disposal is to dispose of the poles at a permitted Subtitle D landfill. The landfill should be contacted prior to transport for specific instructions. Permitted C and D landfills cannot accept utility poles for disposal.
- e. Damaged poles may be buried at an approved site using the Emergency Disposal Site Evaluation and Registry procedure. The Emergency Disposal Site Evaluation and Registry form must be completed, submitted and approved before a disposal site is used. The section "Guidelines for Emergency Burning, Burial and/or Stockpiling of Solid Waste" outlines the site criteria. Such criteria should be reviewed when locating a potential disposal site. **Note:** The bottom of the disposal pit must be at least five feet from known groundwater. It is preferred that the burial site be in clay or clay loam soils. The burial site cannot be in sandy soils. The local DEQ environmental specialist for the cooperative's area will be available to assist in evaluating a site and in completing necessary forms. The local DEQ environmental specialist <u>must</u> visit and approve the site <u>before it is used by the cooperative. Do not submit the form without a DEQ</u> <u>environmental specialist's signature.</u> If a city, town or county does not own or operate the site, the attached Legal Access Agreement must also be completed.
- 10. Site Selection: Local DEQ environmental specialists can assist the cooperative in finding a suitable site and in complying with any state or federal environmental requirement. Staging areas and disposal sites can be located on publicly owned or private property.
- 11. Any questions regarding the criteria for the reuse or disposal of wood utility poles should be directed to the state environmental enforcement office.