



Filing Receipt

Received - 2023-03-15 12:10:25 PM
Control Number - 53385
ItemNumber - 1227

PROJECT NO. 53385

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

**BROAD REACH POWER LLC'S ANNUAL UPDATE TO ITS EMERGENCY
OPERATIONS PLAN PURSUANT TO PUC SUBST. R. 25.53(c)(3) FOR 2023**

Broad Reach Power LLC (“BRP”) hereby submits its annual Emergency Operations Plan (“EOP”) update pursuant to 16 Tex. Admin. Code (“TAC”) § 25.53(c)(3). This update applies to BRP which is a Power Generation Company registered with the Public Utility Commission of Texas under registration number 20555. As supported by the attached Affidavit, BRP made no changes to its EOP in the previous calendar year that materially affects how it would respond to an emergency. BRP continues to comply with all applicable provisions of 16 TAC § 25.53 regarding its existing EOP that was previously submitted to the PUCT and to ERCOT.¹ Further, BRP has no changes to its emergency contact list.

BRP has attached both an Attestation of its highest-ranking representative in compliance with 16 TAC § 25.53(c)(3)(B)(ii) and an affidavit of its highest-ranking representative in compliance with 16 TAC § 25.53(c)(3)(B)(iii).²

Lastly, although not required by 16 TAC § 25.53 for this annual update, BRP submits the attached EOP training and distribution log to provide additional information regarding updates to its EOP training and distribution efforts in 2023. These updates do not materially impact how BRP would respond to an emergency.

¹ See Project No. 53385, Emergency Operations Plan of Broad Reach Power LLC, Item No. 335 (April 18, 2022).

² Such affidavit contains all required components of 16 TAC 25.53(c)(4)(C).

Dated March 15, 2023

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Chris Reeder", written over a horizontal line.

Chris Reeder
State Bar No. 16692300
chris.reeder@huschblackwell.com
Husch Blackwell, LLP
111 Congress Ave., Suite 1400
Austin, Texas 78701
512.479.1154 (Phone)
512.481.4868 (Fax)

ATTORNEY FOR BROAD REACH POWER LLC

ATTESTATION

STATE OF TEXAS

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COUNTY OF TRAVIS

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My name is Steve Vavrik. I am the Chief Executive Officer, and authorized signatory for Broad Reach Power LLC ("BRP"). As Chief Executive Officer for BRP, I affirm that am the highest-ranking representative, official, or officer with binding authority over BRP. I am competent to testify to all the facts stated in this Attestation, and I have the authority to make this Attestation on behalf of BRP.

I swear or affirm that in my capacity as Chief Executive Officer of BRP, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed in Project No. 53385, of the facts included in BRP's 2023 Annual EOP Update pleading, and of the facts included in this Attestation.

I further swear and affirm that in the previous calendar year, BRP did not make any change to its EOP that materially affects how BRP would respond to an emergency.

Steve Vavrik



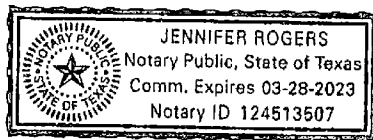
03/13/2023
04:41 PM CDT

Signature of Affiant

Steve Vavrik

Typed or Printed Name

SUBSCRIBED AND SWORN to before me on this 13th of March 2023.



Jennifer B. Rogers



03/13/2023
04:45 PM CDT

Notary Public in and for the State of Texas

Online Notary Public. This notarial act involved the use of online audio/video communication technology.

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AFFIDAVIT

STATE OF TEXAS

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COUNTY OF TRAVIS

§

My name is Steve Vavrik. I am the Chief Executive Officer, and authorized signatory for Broad Reach Power LLC ("BRP"). As Chief Executive Officer for BRP, I affirm that am the highest-ranking representative, official, or officer with binding authority over BRP. I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of BRP.

I swear or affirm that in my capacity as Chief Executive Officer of BRP, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed in Project No. 53385, of the facts included in BRP's 2023 Annual EOP Update pleading, and of the facts included in this Affidavit.

Pursuant to 16 Tex. Admin. Code ("TAC") § 25.53(c)(4)(C), I further swear and affirm that: (i) all relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been conducted to the extent required by 16 TAC § 25.53(f); (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) that BRP maintains a business continuity plan that addresses returning to normal operations after disruption caused by an incident; and (vi) BRP's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training.

I further swear of affirm the information, statements and/or representations contained in the EOP are true, complete, and correct to the best of my knowledge and belief.

Steve Vavrik



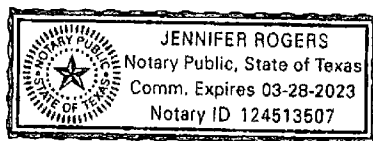
03/13/2023
04:41 PM CDT

Signature of Affiant

Steve Vavrik

Typed or Printed Name

SUBSCRIBED AND SWORN to before me on this 13th of March 2023.



Jennifer B. Rogers



03/13/2023
04:45 PM CDT

Notary Public in and for the State of Texas

Online Notary Public. This notarial act involved the use of online audio/video communication technology.

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2023 BRP PGC EOP Distribution and Training Completed

Name	Date	Signature
Peter Coladarci	3/13/2023	<u>Peter C Coladarci</u> Peter C Coladarci (Mar 13, 2023 15:58 CDT)
Carlis Miller	3/13/23	<u>Carlis Miller</u>
Paul Thompson	3/13/2023	<u>Paul Thompson</u> Paul Thompson (Mar 14, 2023 09:08 CDT)
German Cortes	3/13/2023	<u>German Cortes</u>
Gabriel Roy Liguori	3/13/2023	<u>Gabriel Roy Liguori</u>
Ram Rao	3/13/2023	<u>Ram Das Rao</u>
Casey Kopp	3/13/2023	<u>Casey Kopp</u> Casey Kopp (Mar 13, 2023 14:47 PDT)
Guillaume Dufay	3/13/2023	<u>Guillaume Dufay</u>
Doug Moorehead	3/13/2023	<u>Doug Moorehead</u> Doug Moorehead (Mar 13, 2023 15:59 CDT)
Ashley Waggoner	03/13/2023	<u>Ashley Waggoner</u>
Sally Shaw	03/13/2023	<u>Sally Shaw</u> Sally Shaw (Mar 13, 2023 17:20 CDT)
Stacey Greene	03/13/2023	<u>Stacey Greene</u>



Confidential

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000005

2023 BRP PGC EOP Training - signed

Final Audit Report

2023-03-14

Created:	2023-03-13
By:	Luke Butler (lbutler@broadreachpower.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAYOfZsFZF4aZVbe5CvnE8ZXZquZyzzXMJ

"2023 BRP PGC EOP Training - signed" History

-  Document created by Luke Butler (lbutler@broadreachpower.com)
2023-03-13 - 8:49:30 PM GMT
-  Document emailed to pcoladarci@broadreachpower.com for signature
2023-03-13 - 8:53:19 PM GMT
-  Document emailed to Carlis Miller (cmiller@broadreachpower.com) for signature
2023-03-13 - 8:53:19 PM GMT
-  Document emailed to pthompson@broadreachpower.com for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to German Cortes (gcortes@broadreachpower.com) for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to Gabriel Roy Liguori (groyliguori@broadreachpower.com) for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to Ram Rao (rrao@broadreachpower.com) for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to ckopp@broadreachpower.com for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to Guillaume Dufay (gdufay@broadreachpower.com) for signature
2023-03-13 - 8:53:20 PM GMT
-  Document emailed to UD UD (dmoorehead@broadreachpower.com) for signature
2023-03-13 - 8:53:21 PM GMT
-  Document emailed to Ashley Waggoner (awaggoner@broadreachpower.com) for signature
2023-03-13 - 8:53:21 PM GMT




 Document emailed to Sally Shaw (sshaw@broadreachpower.com) for signature

2023-03-13 - 8:53:21 PM GMT

 Document emailed to Stacey Greene (sgreene@broadreachpower.com) for signature

2023-03-13 - 8:53:21 PM GMT

 Email viewed by Ashley Waggoner (awaggoner@broadreachpower.com)

2023-03-13 - 8:53:41 PM GMT

 Document e-signed by Ashley Waggoner (awaggoner@broadreachpower.com)

Signature Date: 2023-03-13 - 8:54:06 PM GMT - Time Source: server

 Email viewed by Stacey Greene (sgreene@broadreachpower.com)

2023-03-13 - 8:56:42 PM GMT

 Email viewed by pcoladarci@broadreachpower.com

2023-03-13 - 8:57:48 PM GMT

 Email viewed by UD UD (dmoorehead@broadreachpower.com)

2023-03-13 - 8:58:16 PM GMT

 Signer pcoladarci@broadreachpower.com entered name at signing as Peter C Coladarci

2023-03-13 - 8:58:22 PM GMT

 Document e-signed by Peter C Coladarci (pcoladarci@broadreachpower.com)

Signature Date: 2023-03-13 - 8:58:24 PM GMT - Time Source: server

 Document e-signed by Stacey Greene (sgreene@broadreachpower.com)

Signature Date: 2023-03-13 - 8:59:04 PM GMT - Time Source: server

 Signer UD UD (dmoorehead@broadreachpower.com) entered name at signing as W. Douglas Moorehead

2023-03-13 - 8:59:43 PM GMT

 Document e-signed by W. Douglas Moorehead (dmoorehead@broadreachpower.com)

Signature Date: 2023-03-13 - 8:59:45 PM GMT - Time Source: server

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2023-03-13 - 8:59:50 PM GMT

 Document e-signed by Gabriel Roy Liguori (groyliguori@broadreachpower.com)

Signature Date: 2023-03-13 - 9:00:05 PM GMT - Time Source: server

 Email viewed by German Cortes (gcortes@broadreachpower.com)

2023-03-13 - 9:09:00 PM GMT

 Document e-signed by German Cortes (gcortes@broadreachpower.com)

Signature Date: 2023-03-13 - 9:09:56 PM GMT - Time Source: server

 Email viewed by ckopp@broadreachpower.com


2023-03-13 - 9:46:31 PM GMT

 Signer ckopp@broadreachpower.com entered name at signing as Casey Kopp

2023-03-13 - 9:47:07 PM GMT

 Document e-signed by Casey Kopp (ckopp@broadreachpower.com)

Signature Date: 2023-03-13 - 9:47:09 PM GMT - Time Source: server

 Email viewed by Sally Shaw (sshaw@broadreachpower.com)

2023-03-13 - 10:19:49 PM GMT

 Document e-signed by Sally Shaw (sshaw@broadreachpower.com)


Signature Date: 2023-03-13 - 10:20:11 PM GMT - Time Source: server

 Email viewed by Guillaume Dufay (gdufay@broadreachpower.com)

2023-03-13 - 10:48:19 PM GMT

 Document e-signed by Guillaume Dufay (gdufay@broadreachpower.com)

Signature Date: 2023-03-13 - 10:48:51 PM GMT - Time Source: server

 Email viewed by Ram Rao (rrao@broadreachpower.com)

2023-03-14 - 1:14:35 PM GMT

 Document e-signed by Ram Rao (rrao@broadreachpower.com)

Signature Date: 2023-03-14 - 1:15:08 PM GMT - Time Source: server

 Email viewed by pthompson@broadreachpower.com


2023-03-14 - 2:07:55 PM GMT

 Signer pthompson@broadreachpower.com entered name at signing as Paul Thompson

2023-03-14 - 2:08:19 PM GMT

 Document e-signed by Paul Thompson (pthompson@broadreachpower.com)

Signature Date: 2023-03-14 - 2:08:21 PM GMT - Time Source: server

 Email viewed by Carlis Miller (cmiller@broadreachpower.com)

2023-03-14 - 4:07:24 PM GMT

 Document e-signed by Carlis Miller (cmiller@broadreachpower.com)

Signature Date: 2023-03-14 - 4:07:55 PM GMT - Time Source: server

 Agreement completed.

2023-03-14 - 4:07:55 PM GMT

