



## Filing Receipt

**Received - 2023-03-15 02:15:15 PM**  
**Control Number - 53385**  
**ItemNumber - 1285**



9450 SW Gemini Drive PMB #68743, Beaverton, OR 97008-7105  
[www.intersectpower.com](http://www.intersectpower.com)

March 15, 2023

Public Utility Commission of Texas ("PUCT")  
Attn: Central Records  
1701 N. Congress Ave., 8-100  
Austin, TX 78711-3326

**Subject: IP Lumina, LLC Project # 54396 - Emergency Operations Plan ("EOP") Filing for PGC Registration Affidavit**

Pursuant to PUCT Substantive Rule 25.53(C)(3)(B), IP Lumina, LLC Project # 54396 (the "Project") submits this affidavit executed by the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the information below. Please note that the Project is being constructed for Intersect Power, LLC as the client/owner, with Primoris Services Corporation performing as the general contractor with an anticipated Commercial Operation Date ("COD") and ERCOT Part III Commissioning Checklist Approval date in 2023.

The Project has not made any changes to its redacted EOP filed with the PUCT on December 28, 2022 which would materially affect how the Project responds to emergencies.

Statement of intended future compliance: IP Lumina, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

**Rule 25.53; Filing Requirements, Section 4I(i-vi)**

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;

The EOP has been reviewed and approved by the appropriate executives;

**Explanation of Project Construction Status**

The project is currently under construction and no operating personnel are currently present. During construction, the project utilizes Primoris Renewable Energy's *Job Site Safety Plan (JSSP)* Lumina 1 Project No. 55086. Primoris Renewable Energy requires all project employees engaged in work at the Lumina project to receive training (Section 7) and document via the Record Keeping requirements (Section 19.6)

The project is currently in construction and Primoris Renewable Energy's JSSPP identifies Management Commitment and Assignment



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	of responsibilities (Section 2) including a statement from Primoris Renewable Energy (Section 1.1 & 1.2) and the names and contact information of Management including the Safety Manager, Site Manager, and Project Manager. Additionally, the JSSP identifies the Approval by Primoris Renewable Energy and Date of Issue information on page 1.
	The project is currently under construction and no operationally focused drills are able to be conducted. The project will conduct drills to the extent required by subsection (f) prior to and closer to commencing Commercial Operations. In the interim, Primoris Renewable Energy conducts training on the JSSP as described above.
iii	Drills have been conducted to the extent required by subsection (f) of this section;
iv	The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
v	The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
vi	The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency
	Primoris Renewable Energy will conduct meetings and correspondence as needed with external agencies including local EMS, Fire, Medical Clinics, and Police, to facilitate the safe conduct of the project per their JSSP (Section 8.2).
	Primoris Renewable Energy's JSSP maintains Plans and Procedures governing events and incidents for the construction period. Topics include Incident Management (Section 19) Event Investigations (Section 19.3), Lessons Learned (Section 19. 5) and Record Keeping Procedures (Section 19.6); Safety Inspections (Section 18); Primoris Renewable Energy's Job Site Emergency Response plan covers the Emergency Response Team (Section 5 & A-3), Evacuation Plan (Section 6), Severe Weather Plan (Section 7), Fire Emergency Plan (Section 8)
	The project is currently in construction and no operational emergency management personnel have been designated to interact with emergency officials. The appropriate



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Power**

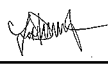
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events have received the latest IS-100,  
IS-200, IS-700, and IS-800 National  
Incident Management System training

personnel will be identified and trained prior  
to and closer to commencing Commercial  
Operations. Primoris Renewable Energy will  
conduct meetings and correspondence with  
external agencies as needed per their Job Site  
Emergency Response Plan (Section A-1 & A-3).

**Reviewed and affirmed by:**

By:  \_\_\_\_\_

Name: Lucas A. Dunnington

Title: President

IP Lumina, LLC

a Delaware limited liability company