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Received - 2023-03-15 02:26:32 PM
Control Number - 53385
ItemNumber - 1293

Emergency Operations Plan

PUCT §25.53



Developed for: Greasewood Solar Power Plant

CONCHO BLUFF, LLC

CONFIDENTIALITY NOTICE

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EXECUTIVE SUMMARY / REVISION HISTORY

This version of the Greasewood Emergency Operations Plan (EOP or “Plan”) was developed in order to provide a clear guide for all phases and types of Emergency Operations and to ensure compliance with all applicable regulatory requirements.

The emergency management personnel designated to interact with local, state, and federal emergency management officials during emergency have been identified in this document in Appendix B

An affidavit as required under paragraph (4)(C) of section §25.53 is included in the Emergency Operations Plan Appendix D.

This plan is a living document and will be reviewed and updated on a regular basis. The Asset Manager is responsible for coordinating these systematic updates.

*Note – Each approved / active version of the Plan remains in effect until replaced / superseded by an updated and approved version.

Revision History			
Version	Date	Actions	Performed By
00	04/01/2020	<ul style="list-style-type: none">Initial Submittal	Novasource
01	04/18/2022	<ul style="list-style-type: none">Updated for Amended 16 TAC §25.53	M. Hoffman
02	03/15/2023	<ul style="list-style-type: none">Reviewed, contacts & ISO training updated	E. Rodriguez

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1 Introduction

- 1.1** The Greasewood Solar Power Plant is a 348 MWdc photovoltaic power plant. The plant is located at: 1945 Owego Rd, Fort Stockton, TX, 79735. The approximate Latitude & Longitude of the site location is: 31.038459, -102.492932 . The name Greasewood Solar Power Plant and Concho Bluffs LLC are both the same and are interchanged. One is the common name, the other is the legal one.
- 1.2** Greasewood connection is to Bakersfield substation.
- 1.3** This power plant is wholly owned by CIP and is currently operated by under and operations and maintenance (O&M) agreement with NovaSource Power Services, which manages the facility daily from both on-site and remotely at the NovaSource Operations Center (NSOC) located at 3133 W Frye Rd suit 500, Chandler, AZ 85226. NovaSource is both the Site Supervisor and the Plant Manager.

2 Purpose & Scope

- 2.1** This document has been developed for Greasewood Solar Power Plant to endure compliance with Chapter 25 of the Public Utility Commission of Texas, Substantive Rules Applicable to Electric Service Providers, Subchapter C, and Quality of Service 25.53 Electric Service Emergency Operations Plans.
- 2.2** Greasewood Solar Power Plant is defined below as a Power Generation Station
 - Greasewood Is a power generation company that:
 - Generates electricity that is intended to be sold at 60% at contractual prices and 40% at wholesale.
 - Does not own a transmission or distribution facility in this state, other than an essential interconnecting facility, a facility not dedicated to public use, or a facility otherwise excluded from the definition of "electric utility" under this section; and
 - Does not have a certificated service area, although its affiliated electric utility or transmission and distribution utility may have a certificated service area.
- 2.3** Since Concho Bluff LLC is defined as a Power Generation Company this plan has been developed and filed per the requirements stated in §25.53(c)(2).

3 Responsibilities

- 3.1** Plant Manager / Site Supervisor
 - Approving this plan.
 - In the event of an emergency evacuation, the Site Manager (or designee) is also responsible for directing Associates, as follows.
 - Relaying the final accountability results to senior Emergency Services staff.
 - Having sole responsibility to allow workers to return to the Site or to dismiss them from the Site.
 - Organizing a meeting of all key Associates after each evacuation to investigate, discuss, and review the occurrence.

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- Assessing Site conditions and directing emergency response activities in accordance with the EAP.
- Making sure that information regarding Site evacuations, emergency assembly areas, communication, and other emergency procedures are accurate and up-to-date.
- Ensure emergency response drills are conducted as required.
- Making sure Site contact information is accurate and up-to-date.
- Preparing detailed written reports of each incident, which include recommendations for preventing future incidents and suggestions for improved handling of similar emergencies.
- Ensuring all Associates have been trained in this plan annually.
- Ensure contractors or visitors at the facility are familiar with these plans through on-site orientation
- The Plant Manager will conduct at least one annual drill to test the EOP. After completion of the drill, the Plant manager will assess the effectiveness of the EOP and changes accordingly. The entity conducting the drill must notify the PUCT, via PUCT website at least 30 days prior to the drill of the date time and location. A table will be added to the EOP identifying the completion dates of the EOP drills.

3.2 Associates

- All Associates at the plant will be trained regarding fire routes, exits, storm shelters, and the location and use of emergency equipment.
- All associates who are designated to interact with local, state, and federal emergency management officials during emergency events receive the latest IS 100, IS 200, IS 700, and IS 800 National Incident Management System training.
- Monitoring their work areas for potential fire risks and obstructed fire exits, alarm stations, fire extinguishers.
- Verifying that emergency evacuation routes and emergency assembly areas are accessible.
- Managing emergency equipment or supplies, including first aid kits, fire-fighting equipment, and PPE.
- Complying with this plan and with the NS EAP.
- Advising Site Management of problems or discrepancies with this EAP at the Site.
- Participate in emergency response activities as necessary.

4 LIST DIRECTORY

Having current lists of emergency contacts and other emergency information is an important aspect of an emergency operations plan. The Greasewood Plant has relevant lists and/or list locations and contact information placed in the Appendix Section(s) of this document

Note 1: All lists / contact information will be collected by the Greasewood Asset Manager

Note 2: The Greasewood “Contact Person” for each list is provided below along with the timeframe for updating each respective list.

List	Responsible Party	Timeframe
1. Organization Chart	Site Manager / Asset Manager	Review Quarterly or as organization charts are modified
2. Governmental Agencies and First Responders	Site Manager / Asset Manager	Review and Update 1 st Quarter of Each Calendar Year
3. Communication / IT Vendors	Site Manager / Asset Manager	Review and Update 1 st Quarter of Each Calendar Year
4. Contractors	Site Manager	Review and Update 1 st Quarter of Each Calendar Year
5. Local and Regional Utility Contacts	Site Manager / Asset Manager	Review and Update 1 st Quarter of Each Calendar Year

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5 GREASEWOOD SAFETY STATEMENT

The Greasewood Safety Program / Safety Manual will remain in full effect at all times. During any type or level of emergency the policies, procedures and information contained in the Safety Manual are to be adhered to by all Greasewood personnel, with no exceptions.

6 Procedures

6.1 Weather Emergency - PUC SUBST. R. §25.53(c)(2)(A)

- Greasewood has an Extreme Climate Conditions Procedures procedure that all of our field associates follow.
- The program addressed requirements and precautions to be taken when working in extreme hot or cold weather conditions.
- Checklist for adequacy and operability of backup equipment, personnel resource, and lessons learned is listed below in Appendix C.

6.2 Emergency Shortage of Water Plan - PUC SUBST. R. §25.53(c)(2)(B)

- The Greasewood facility does not rely on water for reliable operations. Cases of potable bottle water are provided for site workers in sufficient quantity to ensure two weeks supply in event of an emergency.

6.3 Restoration of Service – PUC SUBST. R. §25.53(c)(2)(C)

- Greasewood will continue to manage and monitor critical inventory on site to minimize lost generation due to part availability. Additionally, Greasewood will continue to perform routine inspections and maintenances on all backup power sources to ensure effective operation in an emergency or hazardous situation.
- The site personnel are staffed during normal business hours with a technician team on-call every day. In addition to the site staffing, the site has a remote operations center that is monitoring the site 24/7 and can perform remote resets if needed. If intervention is needed by a technician, the remote operations center will dispatch the team.
- In the event of an emergency, proper notifications will be sent to emergency dispatches, Site Management, and Asset Management following the facilities Emergency Action Plan (EAP).

6.4 Pandemic and Epidemic Preparedness Plan - PUC SUBST. R. §25.53(c)(2)(D)

- Greasewood Solar Power Plant is a minimally staffed solar plant with two (2) Full-time associates. In the event of a pandemic and the associate(s) at the plant became ill, they would be directed to leave the plant and the plant would then be remotely operated & monitored by FSOC.

6.5 Hurricane Plan - PUC SUBST. R. §25.53(c)(2)(E)

- Greasewood is not located in a hurricane prone area, and as such does not maintain an emergency plan specific to hurricanes.

6.6 Cyber Security - PUC SUBST. R. §25.53(c)(2)(F)

- Greasewood will continue to monitor cyber assets for potential intrusion points, indications of malware, and proper cyber security protocols.
- The cyber assets located at the Greasewood facility will remain updated with the latest patches and antivirus/antimalware signatures. Controls include, but are not limited to, intrusion detection software suites, regularly updated antivirus/antimalware software, etc.

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- If a cyber security breach is suspected, proper notifications to IT security personnel, Asset Management, and Site Management will be made in accordance with the facility's NERC CIP protocol and the site Emergency Action Plan (EAP) procedures.
- To prevent cyber incidents, facility personnel and subcontractors will be required to use strong passwords that are frequently updated, report suspicious emails or suspicious unsolicited contacts, prevent usage of transient cyber assets in the form of uncontrolled laptops or USB storage devices, and maintain physical security controls on any server rooms or critical cyber assets.
- Following a cyber security incident, plans, procedures, protocols, and cyber security controls will be reviewed and revised as necessary.

6.7 Physical Security Incident - PUC SUBST. R. §25.53(c)(2)(G)

- Greasewood will continue to monitor site personnel access and logbook information for critical physical security locations.
- The physical assets located at the Greasewood facility will remain locked and secured to prevent unauthorized access to physical assets. Controls include, but are not limited to, doors with keyed locks, locked gates on access roads, and fenced substation areas with separately locked control houses.
- Physical assets will be locked and secured when no personnel are present at the physical asset. Unsecured perimeters may be present in line with safety protocols applicable to specific work tasks only when personnel are present and performing work at a specific physical asset.
- In the event of a physical security incident, employees will move to a predefined secured location and make notice to all employees at the facility. Local law enforcement agencies will also be notified of the physical security incident to provide assistance with the incident. The proper contacts are listed in the site Emergency Action Plan (EAP).
- Following a physical security incident, plans, procedures, protocols, and physical security controls will be reviewed and revised as necessary

APPENDIX A

GREASEWOOD CONTACT LIST

CIP (Owner)

Name	Phone	Email
Manan Parikh	347-852-3448	map@cisc.dk
Connie Moser	917-887-4457	com@cisc.dk

Exus Management Partners (Asset Manager)

Name/Title	Phone	Email
Ernesto Rodriguez <i>Asset Manager</i>	412-991-6907	ER@exuspartners.com
Krishna Santhanam <i>Director of Asset Management</i>	412-877-0396	ks@exuspartners.com

Contact for:

- Compliance Oversight (NERC, FERC, ERCOT)
- Project Stakeholder Communications (lenders, off takers, landowners, etc.)

NovaSource – Site Manager and Site Supervisor

Name/Title	Phone	Email
Michael Wong <i>Regional Director</i>	480-549-0731	michael.wong@novasourcepower.com
Joshua Langer <i>Engineering Director</i>	480-353-1776	joshua.langer@novasourcepower.com
David Trussell <i>Site Manager</i>	432-302-1607	david.trussell@novasourcepower.com

Contact for:

- Day to day operations monitoring (including but not limited to planned and unplanned BOP system outages)
- Emergency notifications/distributions

Tenaska (Energy Manager)

Name/Title	Phone (Primary)	Phone (Secondary)	Email
Realtime Desk/24x7 Contact	817-462-1509	817-905-3060	Outage@tnsk.com
John Murray <i>Energy Manager</i>	817-462-1034	817-233-3403	Jmurray@tnsk.com
Christian Tomaino <i>Energy Manager</i>	817-804-8796	570-614-3325	ctomaino@tnsk.com
Donald Renz <i>Senior System Operator</i>	817-804-8719	N/A	drenz@tnsk.com

Contact for:

- Day ahead scheduling
- Planned and unplanned BOP system outages (including equipment used for system operator communications)
- Active Voltage Control Malfunctions

APPENDIX B

EMERGENCY CONTACT LIST AND DISTRIBUTION LIST

Name/Title		Phone	Email
Michael Wong <i>Regional Director</i>	Secondary Contact	480-549-0731	michael.wong@novasourcepower.com
Joshua Langer <i>Engineering Director</i>	Secondary Contact	480-353-1776	joshua.langer@novasourcepower.com
David Trussell <i>Site Manager</i>	Primary Contact	432-302-1607	david.trussell@novasourcepower.com
Ernesto Rodriguez <i>Asset Manager</i>	Tertiary Contact	412-991-6907	ER@exuspartners.com

Name/Department	EOP Distribution/Training
Ernesto Rodriguez	2/27/2023
David Trussell	2/27/2023
Joshua Langer	
Michael Wong	
Tenaska	
Local Fire/Emergency Departments	

ISO Completion Dates				
Name	ISO 100	ISO 200	ISO 700	ISO 800
Michael Wong <i>Novasource Regional director</i>	1/9/23	1/26/23	1/27/23	1/27/23
Joshua Langer <i>Novasource Engineering Director</i>	Refresh training in progress	Refresh training in progress	Refresh training in progress	Refresh training in progress
David Trussell <i>Site Manager</i>	1/27/23	1/28/23	1/28/23	1/28/23
Ernesto Rodriguez <i>Asset Manager</i>	Refresh training in progress	I Refresh training in progress	Refresh training in progress	Refresh training in progress

**** The EOP will be updated when all personnel complete the required EOP training and respective ISO 100, 200, 700, and 800 trainings****

APPENDIX C

WEATHER EMERGENCY CHECKLIST

Personnel	Yes/No
Crew availability and backup support	YES
Emergency Contact list available (I.e. Substation, Vehicles, O&M Building)	YES

Clothing/Miscellaneous Supplies	Yes/No
Clothing (footwear, gloves, hat, jacket/pants)	YES
Emergency Food/Water Available	YES
Blankets	YES
Flashlights	YES
Cellphone, portable charger, and extra batteries	YES

Vehicle Preparations	Yes/No
Fuel for vehicles	YES
Booster Cables Available	YES
Tow Chains and/or Straps	YES
First Aid Kit	YES
Fire Extinguisher	YES
Snow shoveling equipment	YES
Windshield Scraper	YES

Verification of Backup Power Equipment	Yes/No
Winterization Checklist Completed	YES

Lessons Learned	Yes/No
Ensure personnel have means of transportation to and from site.	YES
Give notice to road maintenance contractors to ensure clear access to site.	YES

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APPENDIX D

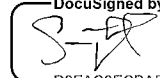
OPERATIONS AFFIDAVIT

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

"My name is Sean Toland. I am the Secretary of Concho Bluff, LLC. My business address is 412 W 15th Street, 15th Floor,
New York, NY 10011. I swear or affirm that I have personal knowledge of the facts set forth in this Affidavit. I am over 18 years of age and competent to make this affidavit.

Concho Bluff, LLC, a registered Power Generation Company, has emergency operations procedures in accordance with Public Utility Commission of Texas Subst. Rule §25.53(c), and all relevant operating personnel are familiar with the contents of the emergency operations plan, and such personnel are committed to following the plan except to the extent deviations are appropriate under the circumstances, during the course of an emergency. Additionally, the drills will be conducted to the extent required by subsection (f), and the EOP has been distributed to local jurisdictions as needed. The entity's emergency management officials during emergency events are in progress of receiving the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

DocuSigned by:



Name: Sean Toland

Title: Secretary

Company: Concho Bluff, LLC

For Concho Bluff LLC