



Filing Receipt

Received - 2023-03-15 02:29:03 PM
Control Number - 53385
ItemNumber - 1294

Emergency Operations Plan

PUCT §25.53



Developed for: Rattlesnake Power LLC

CONFIDENTIALITY NOTICE

This document, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, copy, use, disclosure, or distribution is prohibited.

EXECUTIVE SUMMARY

This version of the Rattlesnake Power, LLC 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.

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.

Additionally, the Plant Manager will conduct and coordinate at least one annual drill to test the effectiveness of the EOP. After completion of the drill, the Plant Manager will assess the results and enact changes as necessary. 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.

All associates who are designated to interact with local, state, and federal emergency management officials during emergency events must receive the latest IS 100, IS200, IS 700, and IS 800 National incident management system training tracked and updated in Appendix B as required under paragraph (4)(C).

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

*Note – Each approved / active version of the Plan remains in effect until replaced / superseded by an updated and approved version.

PLAN APPROVALS / REVISION HISTORY

Revision History		
Version	Date	Actions
00	07/09/2018	<ul style="list-style-type: none"> Updated EOP to align with PUC EOP
01	04/08/2022	<ul style="list-style-type: none"> Updated for Amended 16 TAC
02	04/09/2022	<ul style="list-style-type: none"> Updated for Asset Manager Contact
03	03/15/2023	<ul style="list-style-type: none"> Updated for Asset Manager Contact

PLAN INDEX / TABLE OF CONTENTS

Confidentiality Notice	1
Plan Approvals / Revisions	2
Plan Index / Table of Contents	3
Purpose / Overview	4
Declaration of Emergency Event / Incident	5
List Directory	7
Rattlesnake Safety Statement	8
EOP Action Plans	9
Weather Emergency	9
Emergency Shortage of Water Plan	10
Restoration of service	11
Pandemic/Epidemic Preparedness Plan	12
Hurricane Plan	13
Cyber Security	14
Physical Security Incident	15
Attachments / Appendices	
A. Rattlesnake Contact List	16
B. Distribution List	18
C. Extreme Weather Checklist	19
D. Operations Affidavit	20

PURPOSE / OVERVIEW

The purpose of this document is to provide Rattlesnake Power, LLC (RTS) management and personnel with the information needed to manage an emergency event or situation. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule 25, §25.53).

RTS maintains an Emergency Operations Plan in anticipation of natural disaster or situations involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts.

The plan includes sections that will ensure that RTS personnel understand what to do in advance of predictable emergencies and how key roles and responsibilities will be assigned and performed during emergency events and situations.

Specifically, this plan was developed for the following reasons:

- To provide the structure and processes to guide the organization during all types of emergency conditions and situations.
- To establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing the RTS's human and physical resources, and if necessary, by securing and utilizing outside resources.
- To ensure that RTS is in compliance with the regulatory requirements related to emergency operations and emergency response.

DECLARATION OF EMERGENCY EVENT

This plan provides structure, procedures and tasks related to RTS's response to all types of possible emergency events and incidents and give the RTS Asset Manager or the Asset Manager's designee, the responsibility and discretion to declare a situation, event or incident as "Emergency".

This plan will ensure that there are clear roles and responsibilities for each emergency event.

The designation of an emergency event or incident will generally fall into the following types and levels of emergencies:

1. Pre-Emergency Preparation (P)

- RTS conducts normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.
- Typically lasts up to 24-72 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.
- An Event Manager will be designated by the Asset Manager.

2. Significant Event(s) (E-1)

- The emergency event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric generation service in one or more area of the facility, with power being restored to all areas within 24 hours).
- An Event Manager will be designated by the Asset Manager. The Asset Manager will determine if other roles are required. If required, the Asset Manager will identify the RTS management and/or staff personnel to fill all or some of the emergency roles (Operations/Restoration, Logistics, Finance/Administration, Member Services, Technology, and Communications).

3. Major Event(s)

- A segment of the organization has experienced a power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal field work.
- Major events are severe but not yet catastrophic. This type of emergency needs to be monitored closely to determine if, in fact, it will escalate to a catastrophic condition.
- Major events are expensive and can include problems like loss of critical components of the electric generator infrastructure such as substations, transmission assets, generators, and other equipment that could include loss of RTS's ability to conduct business.
- An Event Manager will be designated by the Asset Manager. The Asset Manager will identify the RTS management and/or staff personnel to fill the roles (Operations/Restoration, Logistics, Finance/Administration, Member Services, Technology, and Communications). It is likely that two or more personnel will be required to fill each role due to the extended nature of the emergency event.

4. Catastrophic Event(s)

- A Catastrophic event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster, or the computer center is lost for an extended period of time.

- The organization must have systems in operation within 72 hours or experience significant economic loss.
- An Event Manager will be designated by the Asset Manager. The Asset Manager will identify the RTS management and/or personnel to fill the roles (Operations/Restoration, Logistics, Finance/Administration, Member Services, Technology, and Communications). It is likely that two or more personnel will be required to fill each role due to the extended nature of the emergency event.

5. Recovery

- After an emergency event, the organization will require a time period to return to normal operations.
- The Asset Manager will work with the RTS team to organize the recovery tasks, reporting tasks and other related operational and business actions required for the full recovery of the system and operations.

LIST DIRECTORY

Having current lists of emergency contacts and other emergency information is an important aspect of an emergency operations plan. The RTS 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 RTS Asset Manager

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

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

RTS SAFETY STATEMENT

The RTS 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 RTS personnel, with no exceptions.

PUC SUBST. R. §25.53(c)(2)(A)

WEATHER EMERGENCY*

Purpose and Applicability

To identify and formulate a counterplan for any known critical failure points with the generation facility equipment as it relates to severe hot and cold weather, and readiness procedures to respond to a severe weather emergency.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule 25, §25.53).

Initial Tasks

- Identify critical temperature thresholds.
- RTS does not rely on adequacy or operability of fuel switching equipment. The facility is declared to be an intermittent renewable resource.
- Prepare a checklist for generation resource personnel to use during a cold or hot weather emergency response

Annual Review / Ongoing Maintenance

- **Annual Review:** The Severely Cold Weather and Severely Hot Weather Plans and procedures will be reviewed annually (or as needed) to ensure that the information is current.
- **Ongoing Maintenance:** The Severely Cold Weather and Severely Hot Weather Plans and procedures will be reviewed as necessary, or at a minimum annually.

Pre-Event Tasks

- Perform preventative weatherization procedures as applicable for the specific season.
- Notify site QSE of any ambient operating temperature limitations in advance of anticipated severely hot / severely cold weather events, including impacts to potential generation levels.

Plan

- For clarity, the Rattlesnake generating facility does not rely on adequacy or operability of fuel switching equipment. The facility is declared to be an intermittent renewable resource.
- Rattlesnake is designed to remain operational during severely hot and cold weather. Each turbine has an operational range from -30°C to +40°C. If these temperatures are exceeded, the turbines will automatically shut down. Preventative maintenance activities are performed twice a year per year on each turbine. Included in these activities are tasks that improve turbine reliability during extreme weather. Weatherization plans are in place to verify the completion of these tasks prior to summer and winter operations.
- Procedures are in place to communicate, in advance and in real-time, the extreme weather effects on wind farm operations to the Qualified Scheduling Entity (QSE). Additionally, substation equipment checks are performed periodically to verify weather readiness. Any defects that are discovered through preventative and routine maintenances will be immediately remedied.
- Site personnel and subcontractors are required to operate within predefined safety measures accounting for tasks and areas of the facility permissible for access during severe temperature events. These safety measures include the use of proper Personal Protective Equipment, and the necessary supplies to be available to the personnel during such events.
- Checklist for adequacy and operability of backup equipment, personnel resource, and lessons learned is listed below in Appendix C.

PUC SUBST. R. §25.53(c)(2)(B)

EMERGENCY SHORTAGE OF WATER PLAN*

Purpose and Applicability

To address the risk of an emergency water shortage for the Rattlesnake facility.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule 25, §25.53).

Initial Tasks

- Not applicable, the RTS project does not rely on water to operate and will not need to have a plan for emergency water shortages.

Annual Review / Ongoing Maintenance

- **Annual Review:** The Emergency Shortage of Water Plan will be reviewed annually (or as needed) to ensure that the information is current.
- **Ongoing Maintenance:** The Emergency Shortage of Water Plan will be reviewed as necessary or at a minimum annually.

Pre-Event Tasks

- Not applicable, the RTS project does not rely on water to operate and will not need to have a plan for emergency water shortages.

Plan

- RTS does not rely on water to operate the generating facility equipment

PUC SUBST. R. §25.53(c)(2)(C)

RESTORATION OF SERVICE

Purpose and Applicability

Provide guidelines and processes to return generation units that have failed to start or trip offline due to a hazard or threat.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule 25, §25.53).

Initial Tasks

- Identification and allocation of critical spare parts and equipment required to return operational assets to service
- Identify third-party vendors capable of supporting the restoration, and/or replacement of critical parts or equipment

Annual Review / Ongoing Maintenance

- **Annual Review:** The onsite inventory of critical spare parts and components will be reviewed annually (or as needed)
- **Ongoing Maintenance:** The site personnel will maintain and share the up-to-date inventory list with the Asset Manager, as well as findings from corrective and preventative maintenances to track known critical failure points.

Pre-Event Tasks

- Ensure applicable spare parts or equipment is available and in good working order
- Ensure current critical asset configurations and settings are backed up to locations accessible in the event of a local communication outage
- For parts not kept on-site, identify suppliers, availability, and lead times

Plan

- Rattlesnake will continue to manage and monitor critical inventory on site to minimize lost generation due to part availability. Additionally, RTS 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).

PUC SUBST. R. §25.53(c)(2)(D)

PANDEMIC AND EPIDEMIC PREPAREDNESS PLAN*

Purpose and Applicability

Provide guidelines and procedures to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic or epidemic event and to generally prepare RTS for the possibility of a pandemic or epidemic.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule, §25.53).

Initial Tasks

- Develop a list of essential personnel and tasks that will require workers to be on-site at the RTS facility.

Annual Review / Ongoing Maintenance

- **Annual Review:** The Pandemic Plan will be reviewed annually (or as needed) to ensure that the information is current.
- **Ongoing Maintenance:** The Pandemic Plan will be reviewed as necessary or at a minimum, annually.

Pre-Event Tasks

- Monitor and communicate with site personnel any potential pandemic-level contagions that may impact the area.
- Ensure adequate supply of disinfectant is on hand to treat potentially contaminated surfaces/areas.
- Ensure an adequate supply of personal protective equipment used to prevent the spread of the contagion is available for site personnel use.
- Identify any tasks / activities that can be delayed or altered to limit the spread of the contagion.

Plan

- RTS will set a plan in place to prepare for and control a pandemic event both on site as well as at the Goldwind Remote Operations Center. When pandemic conditions exist, the RTS Site Manager will educate site employees on the symptoms and preventative actions to limit the spread of the contagion. The Site Manager will also direct site employees who have the contagion to take the proper actions to limit the spread of the contagion and any area, equipment or other items possibly contaminated will be disinfected.

PUC SUBST. R. §25.53(c)(2)(E)

HURRICANE PLAN

Purpose and Applicability

To provide guidelines for the preparation and activities to undertake in all stages and phases of a tropical storm / hurricane event.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule, §25.53).

Initial Tasks

- Not applicable, the RTS facility is not located in a hurricane prone area.

Annual Review / Ongoing Maintenance

- **Annual Review:** The Hurricane Plan will be reviewed annually (or as needed) to ensure that the information is correct.
- **Ongoing Maintenance:** The Hurricane Plan will be reviewed as necessary, or at a minimum annually.

Pre-Event Tasks

- Not applicable, the RTS facility is not located in a hurricane prone area.

Plan

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

PUC SUBST. R. §25.53(c)(2)(F)

CYBER SECURITY

Purpose and Applicability

Provide guidelines and procedures to effectively deal with cyber security preparedness and incident response to ensure reliability of the bulk electric system.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule, §25.53).

Initial Tasks

- Identify critical cyber security potential hazards and critical contacts for incident

Annual Review/Ongoing Maintenance

- **Annual Review:** The Cyber security plan will be reviewed annually (or as needed) to ensure that the information is correct and accurate
- **Ongoing Maintenance:** The Cyber security plan will be reviewed as necessary, or at a minimum annually. Site log access logbook to be reviewed and updated as necessary, or at a minimum monthly. Perform cyber security drills as set forth in the site emergency action plan and the current NERC CIP procedures.

Pre-Event Tasks

- Monitor and communicate with site personnel any potential cyber security suspicions
- Ensure proper routine training of site staffing
- Password and user credentials management and requirements
- Analyze firewall and security equipment

Plan

- RTS will continue to monitor cyber assets for potential intrusion points, indications of malware, and proper cyber security protocols.
- The cyber assets located at the RTS 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.
- 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.

PUC SUBST. R. §25.53(c)(2)(G)

PHYSICAL SECURITY INCIDENT

Purpose and Applicability

Provide guidelines and procedures to effectively prevent the occurrence of physical security incidents, and to set forth guidelines for physical security incident response.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule, §25.53).

Initial Tasks

- Identify critical areas of physical security importance
- Identify critical contacts for physical security incidents

Annual Review/Ongoing Maintenance

- **Annual Review:** The Physical Security Plan will be reviewed annually (or as needed) to ensure that the information is correct and accurate
- **Ongoing Maintenance:** The Physical Security Plan will be reviewed as necessary, or at a minimum annually.

Pre-Event Tasks

- Monitor and communicate with site personnel site access logbooks and response plans
- Ensure proper response and administrative training of site personnel
- Ensure proper physical security management procedures are available and implemented.

Plan

- RTS will continue to monitor site personnel access and logbook information for critical physical security locations.
- The physical assets located at the RTS 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

RTS CONTACT LIST

Exus Management Partners (Asset Manager)

Name/Title	Phone	Email
John Nichols <i>Asset Manager</i>	607-382-7336	jin@exuspartners.com
Krishna Santhanam <i>Director of Asset Management</i>	412-877-0396	ks@exuspartners.com

Contact for:

- Day to day operations monitoring (including but not limited to planned and unplanned BOP system outages)
- Compliance Oversight (NERC, FERC, ERCOT)
- Project Stakeholder Communications (lenders, off takers, landowners, etc.)

Engie (Energy Manager)

Name/Title	Phone (Primary)	Phone (Secondary)	Email
Realtime Desk/24x7 Contact	877-336-3480	N/A	assetman@engie.com
Kyle Gibson <i>VP, Asset Management</i>	713-636-1851	713-206-0448	Kyle.gibson@engie.com
James Thames <i>Scada Engineering</i>	713-636-1640	N/A	James.thames@engie.com
Susan English <i>Manager, Scheduling</i>	713-636-1834	N/A	Susan.english@engie.com
Oguz Orhon <i>Settlements</i>	713-636-1970	N/A	Oguz.orhon@engie.com

Contact for:

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

Goldwind (Site Operations)

Name/Title	Phone (Primary)	Phone (Secondary)	Email
GoldWind ROC	1-800-605-2228	N/A	N/A
Antonio Rodriguez <i>Site Manager</i>	915-249-2002 EXT 32002	773-998-0572	ARodriguez@goldwindamericas.com
Chancey Coffelt <i>Regional QHSE Manager</i>	815-357-7394	815-994-8202	ccoffelt@goldwindamericas.com
Justin Denning <i>Site EHS Tech</i>	312-608-4219	N/A	jdenning@goldwindamericas.com

Contact for:

- Planned and unplanned BOP system outages (including equipment used for system operator communications)

EMERGENCY CONTACTS

Name/Title	Phone	Email
John Nichols - Primary <i>Asset Manager</i>	607-382-7336	jjn@exuspartners.com
Antonio Rodriguez – Primary <i>Site Manager</i>	773-998-0572	ARodriguez@goldwindamericas.com
Justin Denning - Backup <i>Site EHS Tech</i>	312-608-4219	idenning@goldwindamericas.com

APPENDIX B

DISTRIBUTION LIST

Name/Department	EOP Distribution/Training
John Nichols	3-15-2023/ TBD
Antonio Rodriguez	3-15-2023/TBD
Justin Denning	3-15-2023/TBD
Engie (Energy Manager)	3-15-2023/TBD
Local Fire/Emergency departments	3-15-2023/TBD

ISO Completion Dates				
Name	ISO 100	ISO 200	ISO 700	ISO 800
John Nichols <i>Asset Manager</i>	In progress	In progress	In progress	In progress
Antonio Rodriguez <i>Site Manager</i>	4/12/2022	4/12/2022	4/12/2022	4/13/2022
Justin Denning <i>Lead technician/BOP</i>	4/13/2022	4/13/2022	4/13/2022	4/18/2022

**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	
Emergency Contact list available (I.e. Substation, Vehicles, O&M Building)	

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

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

Verification of Backup Power Equipment	Yes/No
Winterization Checklist Completed	

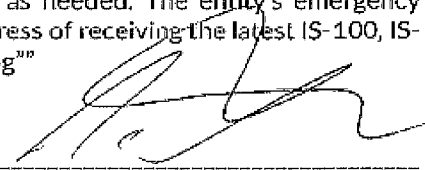
Lessons Learned	Yes/No
Ensure personnel have means of transportation to and from site.	
Give notice to road maintenance contractors to ensure clear access to site.	

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, Nicolas Matos, I am, the Secretary of Rattlesnake Power, LLC. My business address is 1425 Bedford Ave Suite 66, Pittsburgh, PA 15214; 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."

Rattlesnake Power, 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 will be distributed to local jurisdictions as needed. The entity's emergency management officials responsible during emergency events are in progress of receiving the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training"



Name: NICOLAS MATOS MALTINOV
Title: SECRETARY
Company: RATTLESNAKE POWER, LLC

For Rattlesnake Power, LLC