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Received - 2023-03-15 02:29:41 PM
Control Number - 53385
ItemNumber - 1295

PROJECT NO. 53385

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

EMERGENCY OPERATIONS PLAN

FOR PETRA NOVA POWER I LLC. POWER GENERATION COMPANY

EXECUTIVE SUMMARY

Contents and Policies

This Emergency Operations Plan (EOP) is submitted by, and is applicable to Petra Nova Power I LLC. (PNPI), a Power Generation Company (PGC). The redacted EOP is being submitted for compliance with 16 Tex. Admin. Code §25.53.

While PNPI is the owner of the power generation facility, operations and maintenance of the facility is entrusted to NRG Maintenance Services LLC. (NRG MS) under Operations and Maintenance Agreement between PNPI and NRG MS.

The purpose of the EOP is to provide guidance to be followed by PNPI and NRG MS in response to any potential or actual business disruption impact, or with the potential to impact, PNPI and to provide the framework for the continuation of operations.

PNPI and NRG MS have extensive experience in preparing for and handling emergencies, and the contents of the plans used for emergencies have been proven effective in dealing with multiple types of emergencies.

The EOP meets the requirements of the rule with a compilation of relevant documents. In addition to the EOP, there is specific procedures that provide guidelines for the actions necessary in the event of an emergency situation.

Summary of EOP

The EOP submitted on behalf of the PNPI is comprised of communication, emergency and crisis management plans to address pre, mid, and post event efforts related to actual or potential crises and emergencies, including hazards and threats as well as additions to address the requirements set forth by 16 Tex. Admin. Code (TAC) §25.53 effective March 20, 2022. The procedures outlined in the plans provide guidelines for actions necessary in the event of an emergency situation such as severe hot or cold weather, hurricane, water shortage or drought, pandemic/epidemic, cyber and physical security, and tornado. It is the responsibility of all personnel to ensure that the procedures outlined in plans that comprise the EOP are maintained and carried out properly. As a whole, these plans are the EOP and any activation of one is an activation of the EOP.

The following information provides high-level information on how the EOP addresses rule requirements, followed by an index of where to find documentation applicable to each requirement. The compilation of emergency operations plans incorporated within the EOP are summarized below and, as a whole, they comprise the EOP and include the following:

Communication Plan: The *Emergency Notifications Plan* of the EOP outlines a plan for communicating and reporting of emergency events to the appropriate levels of PNPI and, when applicable,, for communicating and reporting of emergency events to the public, external media, the Commission, fuel suppliers, local and state governmental entities, officials, emergency operations centers, as appropriate in the circumstances; and the applicable reliability coordinator, as appropriate, to ensure necessary outreach and availability for contact occur as appropriate at each level of an event.

Supplies Plan: The compilation of emergency operations plans that comprise the EOP set forth, separately and individually, guidelines and guidance for ensuring that adequate inventories of all commodities, equipment, and other necessary supplies are available during an emergency event.

Staffing Plan: The compilation of emergency operations plans that comprise the EOP include, separately and individually, guidelines and procedures for staffing during emergency events to ensure business and plant operations can continue during events, including any necessary relocations.

Weather-Related Hazards Identification and Activation Plan: The compilation of emergency operations plans that comprise the EOP outline the processes for identification of an emergency situation and the actions required to ensure reliable operation through the emergency event. The EOP also contains a process for activation of a plan, as necessary, based on the identification efforts.

Annexes: As noted above, PNPI takes an all-hazards approach to emergency and crisis management. As required by 16 TAC §25.53 (e)(2) various detailed plans specific to certain events for a PGC are addressed including extreme cold and hot weather, water shortages, pandemics and epidemics, hurricanes, cyber security and physical security, and tornados.

Cold Weather Emergency Annex: The EOP sets forth, in the *Petra Nova Carbon Capture Winter Readiness Procedure*, an operational plan for responding to a cold weather emergency. Winter readiness refers to the preparation required to ensure reliable operation during winter weather emergencies, defined to be from November 1 through March 31.

Hot Weather Emergency Annex: The EOP includes a *South Region Operations Summer Readiness Plan* that is an operational plan for responding to a hot weather emergency. Summer readiness refers to the preparation required to ensure reliable operation during extreme summer weather conditions, defined as being the period from May 1 through September 30.

Pandemic and Epidemic Annex: The EOP contains an *Infectious Disease and Pandemic Response Plan* that minimizes employee exposure, maintains essential plant operations in the event of a pandemic/epidemic and applies to all PNPI personnel.

Hurricane Annex: The EOP contains the *WA Parrish Hurricane Emergency Operations Plan* that refers to the preparation required to ensure reliable plant operation during hurricane emergencies, defined to be from the June 1 through November 30, and applies to the plant.

Cyber Security: The EOP includes a *NERC CIP Cyber Security Response Plan* that provides guidance in response to any business disruption impacting, or with the potential to impact, PNPI's cyber security assets. In addition, PNPI employees receive training and internal communications to inform them on how to identify suspicious activity such as phishing and report it to the appropriate personnel. Annual CIP cyber security training is required of employees with access to cyber security assets.

Physical Security Incidents Annex: The EOP includes a *Site Security Manual* that provides guidance in response to any business disruption impacting, or with the potential to impact, PNPI's physical security.

Tornado Annex: The EOP contains a *WA Parrish Tornado Emergency Operating Procedure* that provides a general outline of identification and actions which are followed when tornado activity, or threat of activity, is expected to affect any the facility.

Indexed Reference to EOP Sections That Correspond to Rule Requirements

Reference is made on the attached Exhibit A to specific sections and page numbers of the EOP that corresponds with the requirements of 16 TAC §25.53 for PGCs.

Record of Distribution – Access to and Training on EOP

Outlined on the attached Exhibit B is a record (in table format) containing the titles and names of persons who have received access to and training on the EOP, as well as the dates of access to the relevant portions of the EOP.

List of Primary/Backup Emergency Contacts

Outline below is a list (in table format) of primary and, when possible, backup emergency contacts for the Petra Nova Power I LLC., including identification of the specific individual(s) who can immediately address urgent requests and questions from the Commission during an emergency.

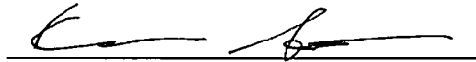
Name	Title	Telephone	Email	Contact Type

Affidavits

Attached as Exhibit C to this Executive Summary is the Affidavit of Kenichi Sato, the President of PNPI.

Attached as Exhibit D to this Executive Summary is the Affidavit of Hidenori Oe, the Vice President of PNPI.

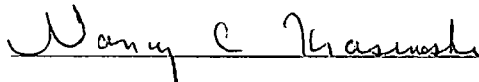
Respectfully submitted,



Kenichi Sato

President, Petra Nova Power I LLC

SUBSCRIBED AND SWORN TO BEFORE ME on the 9th day of March 2023 to certify which witness my official hand and seal of office.



Notary Public in and for the State of Texas

Printed or Stamped Name of Notary

My Commission Expires: May 5, 2023

EXHIBIT A

INDEXED REFERENCES

16 TAC §25.53 (c)(1)(A)(i)(II) – Reference to specific sections and page number of the EOP that correspond with rule requirements for PGC.

Subsection with Requirement for PGCs	Document	Section	Page Numbers (combined)
(c)(1)(A)(i)(I)	Executive Summary	Whole	1-4
(c)(1)(A)(i)(II)	Executive Summary	Indexed References Exhibit A	5
(c)(1)(A)(i)(III)	Executive Summary	Record of Distribution Exhibit B	7 12
(c)(1)(A)(i)(IV)	Executive Summary	Affidavits Exhibit C and D	8-11
(c)(1)(A)(ii)	EOP	Whole	All
(c)(4)(A)	Executive Summary	Record of Distribution Exhibit B	7 12
(c)(4)(B)	Executive Summary	Primary and Backup Emergency Contacts	4
(c)(4)(C)	Executive Summary	Exhibit C and D	8-11
(d)(1)(A)	EOP	Introduction Applicability	16
(d)(1)(B)	EOP	Responsible Individuals	17
(d)(1)(C)	EOP	EOP Date, Controlling Version, and Revision Control Summary	17
(d)(1)(D)	EOP	EOP Date, Controlling Version, and Revision Control Summary	17
(d)(1)(E)	EOP	EOP Date, Controlling Version, and Revision Control Summary	17
(d)(2)(B)	EOP	Communication Plan Attachment A	18 21
(d)(3)	EOP	Supplies Plan	18
(d)(4)	EOP	Staffing Plan	19
(d)(5)	EOP	Weather-Related Hazards Identification and Activation Process	19
(d)(6)	EOP	Annexes	24
(e)(2)	EOP	Annexes (A) Cold Weather Emergency (B) Water Shortage/Drought (C) Restoration of Service	24 50 79

		(D) Pandemic and Epidemic	58
		(E) Hurricane	70
		(F) Cyber security	81
		(G) Physical security incident (s)	104
		(H) Tornado	122

EXHIBIT B

RECORD OF DISTRIBUTION AND TRAINING

EXHIBIT C

AFFIDAVIT OF KENICHI SATO

STATE OF TEXAS)

COUNTY OF HARRIS)

1. BEFORE ME, the undersigned authority, on this day personally appeared Kenichi Sato, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Kenichi Sato. My business address is 3040 Post Oak Blvd Suite 1600, Houston, TX 77056. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am President of Petra Nova Power I LLC (PNPI, Certificate No. 20302). Petra Nova Power I LLC is a Power Generation Company (PGC). I am authorized to make this affidavit on its behalf as President of PNPI.
4. Commensurate with the filing of this Affidavit, the PGC is submitting an Emergency Operations Plan (EOP) for the PGC.
5. Operations and maintenance of the facility is entrusted to NRG Maintenance Services LLC. (NRG MS) under Operations and Maintenance Agreement between PNPI and NRG MS.
6. On behalf of the above-named PGC in connection with the filing of the EOP, I swear and affirm that;
 - a. The EOP for the PGC is shared and familiarized with NRG MS and all relevant operating personnel responsible for the critical operation of the PGC are familiar, will receive training or have received training on the applicable contents and execution of the EOP and plant specific documents and are committed to following the plans and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - b. PNPI's EOP has been reviewed and approved by the appropriate PNPI executives.
 - c. PNPI will comply with the requirements for drills outlined in Rule §25.53. For 2023, drills are currently planned, or will be planned, in accordance with Rule § 25.53. PNPI will comply with the new requirement for a PGC to provide notification of a drill 30 days prior to that drill.
 - d. The EOP, or a summary, will be distributed to local jurisdictions, as deemed necessary.
 - e. The relevant emergency management personnel, under NRG, who are designated to interact with emergency management officials have received the IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of the affidavit, assigned personnel have either completed the training or initiated the training process. All training will be completed within 90 days of this affidavit.

Kenichi Sato

Kenichi Sato

President, Petra Nova Power I LLC

SUBSCRIBED AND SWORN TO BEFORE ME on the 9th day of March 2023 to certify which witness my official hand and seal of office.



Nancy C Krasinski

Notary Public in and for the State of Texas

Printed or Stamped Name of Notary

My Commission Expires: May 5, 2023

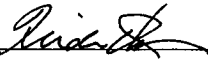
EXHIBIT D

AFFIDAVIT OF HIDENORI OE

STATE OF TEXAS)

COUNTY OF HARRIS)

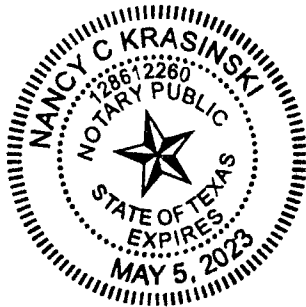
1. BEFORE ME, the undersigned authority, on this day personally appeared Hidenori Oe, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Hidenori Oe. My business address is 3040 Post Oak Blvd Suite 1600, Houston, TX 77056. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am Vice President of Petra Nova Power I LLC (PNPI, Certificate No. 20302). Petra Nova Power I LLC is a Power Generation Company (PGC). I am authorized to make this affidavit on its behalf as Vice President of PNPI.
4. Commensurate with the filing of this Affidavit, the PGC is submitting an Emergency Operations Plan (EOP) for the PGC.
5. Operations and maintenance of the facility is entrusted to NRG Maintenance Services LLC. (NRG MS) under Operations and Maintenance Agreement between PNPI and NRG MS.
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 - b. PNPI's EOP has been reviewed and approved by the appropriate PNPI executives.
 - c. PNPI will comply with the requirements for drills outlined in Rule §25.53. For 2023, drills are currently planned, or will be planned, in accordance with Rule § 25.53. PNPI will comply with the new requirement for a PGC to provide notification of a drill 30 days prior to that drill.
 - d. The EOP, or a summary, will be distributed to local jurisdictions, as deemed necessary.
 - e. The relevant emergency management personnel, under NRG MS, who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of the affidavit, assigned personnel have either completed the training or initiated the training process. All training will be completed within 90 days of this affidavit.

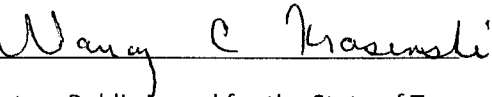


Hidenori Oe

Vice President, Petra Nova Power I LLC

SUBSCRIBED AND SWORN TO BEFORE ME on the 9th day of March 2023 to certify which witness my official hand and seal of office.





Notary Public in and for the State of Texas

Printed or Stamped Name of Notary

My Commission Expires: May 5, 2023