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March 15, 2023

Ms. Jasmine Kirkland Central Records Public Utility Commission of Texas 1701 N. Congress Avenue Austin, TX 78701

RE: Project No. 53385, Project to Submit Emergency Operations Plans and Related Documents under 16 TAC§ 25.53

Dear Ms. Kirkland:

Enclosed for filing please find the following:

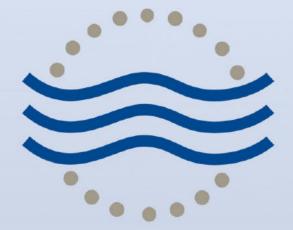
- 1. Brownsville Public Utilities Board's Public Utility Commission of Texas Emergency Operations Plan ("BPUB's PUCEOP") (redacted).
- 2. Executive Summary of BPUB's PUC EOP pursuant to 16 Tex. Admin. Code § 25.53(c)(l)(A)(i), including the redacted List of Emergency Contacts filed pursuant to 16 Tex. Admin. Code § 25.53(c)(4)(A) and (B).
- 3. CONFIDENTIAL Executive Summary of BPUB's PUC EOP pursuant to 16 Tex. Admin. Code § 25.53(c)(l)(A)(i), including the unredacted List of Emergency Contacts filed pursuant to 16 Tex. Admin. Code § 25.53(c)(4)(A) and (B), filed separately under seal.

If you have any questions about this filing, please do not hesitate to contact me at (956) 983-6314 or gleal@brownsville-pub.com.

Respectfully submitted,

Gustavo C. Leal

Brownsville Public Utilities Board NERC Compliance Manager & CCO



PUBLIC UTILITIES BOARD

Emergency Operations Plan Update

March 14, 2023

1425 Robinhood Dr., Brownsville, TX 78521

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I. CHANGE RECORD

BPUB will review the Emergency Operations Plan annually and will make changes as necessary for any undates











IIB. RECORD OF DISTRIBUTION-EXTERNAL

III. MESSAGE FROM GENERAL MANAGER

Operating safely and effectively during emergency situations is extremely important to the BPUB Board and management. In times of emergency events, BPUB electricity customers depend on BPUB staff to restore service rapidly and to provide accurate and timely information. BPUB staff should have clear procedures to ensure safety is maintained at all times. This is particularly true during difficult and often times very fluid situations.

Our Emergency Operations Plan (EOP) is a guide and resource developed to provide structure and integrated policies and procedures to direct our Emergency Operations coordinators, managers, supervisors and frontline employees during all types of emergency conditions and situations. It is intended to incorporate and align with our General Plan for Emergency and incorporates by reference all future updates.

The EOP is important to not just our frontline operations but to all of our staff, as we are all essential workers. BPUB management's task is to work with staff to ensure they understand the EOP, are trained appropriately on the EOP, and enable avenues in which they can ask questions about the EOP. Every department and every BPUB employee has a part to play.

I am confident that each BPUB staff member is capable of performing at the highest-level during emergency events. Thank you for your commitment to safety, emergency response and serving our customers.

Marilyn Gilbert
General Manager & CEO

IV. SAFETY & INCLEMENT WEATHER STATEMENT

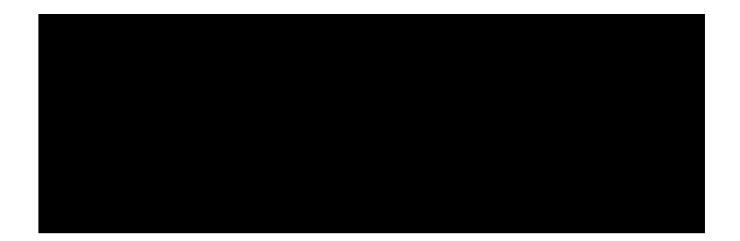
BPUB has preparation plans for responding to a cold or hot weather emergency and associated checklists for generation, transmission, and distribution facility personnel to use during cold or hot weather emergency response. These checklists include lessons learned from past weather emergencies and drills to ensure necessary supplies and personnel are available through the weather emergency. Generally, these are the steps that BPUB will take 72 to 96 hours prior to an anticipated weather event. All Departments have preparations that will be made to support emergency operations ahead of a hot or cold weather event to support BPUB's transmission, distribution, and other systems.

V. BPUB ELECTRICAL SYSTEM INFORMATION

The Brownsville Public Utility Board (BPUB) was formed in 1960 by the City of Brownsville Charter to provide electric, water, and wastewater services to its customers in the Brownsville area. Pursuant to the City's Charter, management, operation, and control of the City's combined water, wastewater, and electric utilities system is delegated to the BPUB. The electric system provides retail electric service through its electric facilities to consumers inside and outside the city limits. The existing customer service area of the electric facilities encompasses approximately 133 square miles of Cameron County, including substantially the entire City (estimated by the BPUB at over 96%). The electric system serves a growing base of approximately 53,000 customers and serves a peak load of 282.68 MW. Current resources, mainly owned by the BPUB, are sufficient to cover peak demand.







1. INTRODUCTION

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§25.53(D)(L)(A) - INTRODUCTION OF EOP AND OUTLINES APPLICABILITY
§25.53(D)(L)(C) - REVISION CONTROL SUMMARY
§25.53(D)(L)(D) - SUPERSEDES PRIOR EOPS
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§25.53(D)(L)(E) - PLAN APPROVALS

This Emergency Operations Plan (EOP) is a key component in the BPUB's emergency management planning process. It aligns with and incorporates the BPUB General Plan for Emergency, and it supports the BPUB's intent to respond to any emergency situation in a safe, effective, and timely manner. BPUB maintains the EOP in anticipation of natural disasters or emergency situations involving curtailment or major interruptions in electrical service. The EOP sets forth organizational and personnel assignments, describes emergency communications procedures, and lists emergency contacts and vendors. This EOP supersedes any prior BPUB EOP.

The purpose of the EOP is to provide BPUB management and personnel with the information needed to manage an emergency event or situation and addresses both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies.

BPUB maintains this EOP in anticipation of natural disasters or situations involving curtailment or major interruptions in electrical service. The EOP sets forth organizational and personnel assignments, describes emergency communications procedures, and lists emergency contacts. As emergencies are often sudden and without warning, these procedures, while providing guidance, are designed to be flexible in order to permit the BPUB staff to respond to any given situation.

The EOP is maintained by the NERC Compliance Manager and Risk Manager. These staff are also authorized to make changes and/or revisions to the EOP.

The EOP aligns with ERCOT procedures for shedding load on a rotating schedule and identifies priorities for restoration of service. The EOP also includes sections that will ensure that BPUB personnel understand what to do in advance of a predictable emergency and how key roles and responsibilities will be assigned and performed during emergency events and situations. The EOP provides guidelines for the BPUB to follow in order to share information efficiently and provide access to critical business and operational information with neighboring utilities, BPUB members, and the community.

Specifically, this plan was developed to:

- Provide the structure and processes to guide the organization during emergency conditions and situations.
- Establish procedures for the restoration of electrical service in a systematic and
 efficient manner by effectively utilizing BPUB's human and physical resources, and if
 necessary, by securing and utilizing outside resources.

- Enable BPUB, neighboring utilities, and the community to share information efficiently and provide access to information critical to business and operations.
- Ensure that BPUB is in compliance with the regulatory requirements related to emergency operations and emergency response.

As in the past, when any emergency has disrupted service to customers, the established lines of authority and responsibility will be followed as far as possible. However, in the event of major emergency, the General Manager may order such reassignment of duties as considered expedient under the circumstances. When a major emergency or disaster exists, the first function of BPUB personnel will be to assess the damages, then clear all hazards resulting from damage to the respective system. The second function will be to restore service to vital community services and installations. The following list is a guideline for the order of restoration of services:

- 1. City Storm Pumps
- 2. Lift Stations and Treatment Plants
- 3. Water Pumping Plants and Stations
- 4. Red Cross Shelters
- 5. Hospitals and Nursing Homes
- 6. Communications Centers
- 7. Food Centers and Storage Facilities
- 8. FAA Navigational Facilities
- 9. Other institutions whose functions are essential to the health and welfare of the community.
- 10. The next function will be to restore service to all remaining customers as quickly as possible.

The duties and responsibilities of Departmental Directors, Managers and Employees under their direction are identified in the following pages of this document and specifically in Section 11 – Emergency Staffing Plan, drawn from the General Plan for Emergency.

This is the initial update of the first EOP prepared by BPUB for submission to PUCT, therefore supersedes the 2022 EOP. It aggregates and summarizes pertinent components of existing BPUB plans and policies as cited herein. This EOP does not supersede these reference documents, but relies upon their updates during the administrative cycle of review and revision.

2. DECLARATION OF EMERGENCY EVENT/INCIDENT

This EOP provides structure, procedures, and tasks related to BPUB's response to various types of possible emergency events and incidents and gives the General Manager or the GM's Designee the responsibility and discretion to declare a situation, event, or incident as an "Emergency."

The GM is authorized to activate the EOP and EOC when they deem necessary due to an emergency or disaster event is imminent affecting operation of the BPUB facilities. The Assistant GM/COO has authority to activate the EOP/EOC in the GM's absence.

BPUB will utilize an Incident Command System (ICS) structure to manage an emergency in coordination with oversight by BPUB management. This will ensure that there are clear roles and responsibilities for each event.

The Incident Commander (IC) is responsible for completing an Emergency Declaration and Tracking Form. This form will document the time, scope, and expected duration along with other key documentation of the event. If an emergency event changes types and levels, this form will reflect these and other changes in status and relevant information regarding the Emergency.

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

1. Pre-Emergency Preparation

- a. BPUB continues to conduct normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.
- b. Typically lasts up to 24 to 72 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.

2. Significant Event(s)

a. The 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 service in one or more districts, with power being restored to all areas within 24 hours).

Major Event(s)

- a. A segment of the BPUB service area has experienced a power interruption or other significant business disruption in excess of 24 hours, or the need for power restoration requires the suspension of normal field work.
- b. 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.

c. Major Events are expensive and can include problems like loss of critical components of the electric infrastructure such as substations, transmission assets, and large amounts of BPUB's distribution system. This could include loss of BPUB's ability to conduct business.

4. Catastrophic Event(s)

- a. A Catastrophic Event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster.
- b. In a Catastrophic Event the organization will experience significant economic loss if the event lasts longer than 72 hours.

5. Recovery

- a. After an Emergency the BPUB will require a time period to return to normal operations.
- b. The IC will work with key management staff to organize the recovery tasks, reporting tasks and other related operational and business actions required for the full recovery of the system and operations.

3. MAINTENANCE AND IMPLEMENTATION OF EOP

§25.53(D)(L)(B) - MAINTENANCE AND IMPLEMENTATION OF EOP

The EOP Committee comprised of various employees and members of management from across the BPUB is responsible for coordinating systematic updates of the EOP.

Beginning in 2023, BPUB must annually update information included in the EOP no later than March 15 under the following circumstances:

- 1. In the previous calendar year BPUB made a change to the EOP that materially affects how BPUB would respond to an emergency must file with the commission an executive summary that:
 - a. describes the changes to the contents or policies contained in the EOP;
 - b. includes an updated reference to specific sections and page numbers of the EOP that correspond with the requirements of the 25.53 rule;
 - c. includes the record of distribution that contains the following information in table format:
 - i. titles and names of persons with BPUB receiving access to and training on the EOP; and
 - ii. dates of access to or training on the EOP, as appropriate.
 - d. contains the affidavit from BPUB's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
 - 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 subsection (f) of this section:
 - iv. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
 - v. the BPUB maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
 - vi. BPUB'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 System (NIMS) training.

- e. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
- f. submit to ERCOT the revised unredacted EOP in its entirety.

4. DRILLS AND EXERCISES

§25.53(F) - DRILLS

Each year, BPUB staff participate in exercises and drills in order to better prepare for an emergency or disaster event. Prior to hurricane season, BPUB ensures that they have the required internal materials on hand, as well as commitments for external resources which may be needed following a storm. Additionally, BPUB ensures that the proper critical facilities (i.e., hospitals, water and wastewater treatment plants, and fire stations) are identified.

The drills/exercises cover the following areas:

- Procedures when there is an approaching severe weather event or hurricane.
- Review of planned and existing transmission outages to be canceled and/or restored.
- Review of emergency operating procedures, evacuation plans, and possible need to staff back-up facilities.
- Testing of TOs and QSEs prior to storm making landfall.
- Testing of communication methods.
- Review of load shedding plans and the need to shed load if instructed by ERCOT.
- Expectations that occur for BPUB facilities during a severe storm.
- ERCOT communications to report transmission outages and any other issues.
- Precautionary actions to take prior to arrival of a severe storm.
- System status conditions that are surveyed following a severe storm.
- Purpose of ground indicator lights and actions taken if recognized

Drills/Exercises that have been conducted by BPUB in the past two years are:

- Severe Weather Drill (September, 2021)
- Hurricane/Tropical Storm Drill (July, 2021)
- Hurricane/Tropical Storm Drill (July, 2022)
- Active Shooter Drill (February, 2023)

Following each of the drills, BPUB staff developed lessons learned and incorporated those changes into updated emergency response plans.

5. LIST DIRECTORY

Lists and other readily accessible contact information are important during emergency events and situations. The BPUB EOP is designed to have all lists, contact information, and other relevant reference information in the Appendix Section(s) of the EOP. The List Directory provides the name of the list (or document) along with the position / staff member in the organization that is responsible for keeping the list current, along with the timeframe for updating the lists, contact information and other relevant reference information.

The List Directory is maintained by the NERC Compliance Manager and Risk Manager. The Lists will be reviewed and updated at least annually.

Lists include:

- BPUB Organization Chart
- Governmental Agencies
- Critical Load Program Contacts
- Media Contacts
- Telecommunication and IT/OT Vendors
- Line Construction
- Right-of-Way Contractors
- Service Providers
- Regional Utility Contacts
- Materials Vendors
- Emergency Contacts (First Responders)

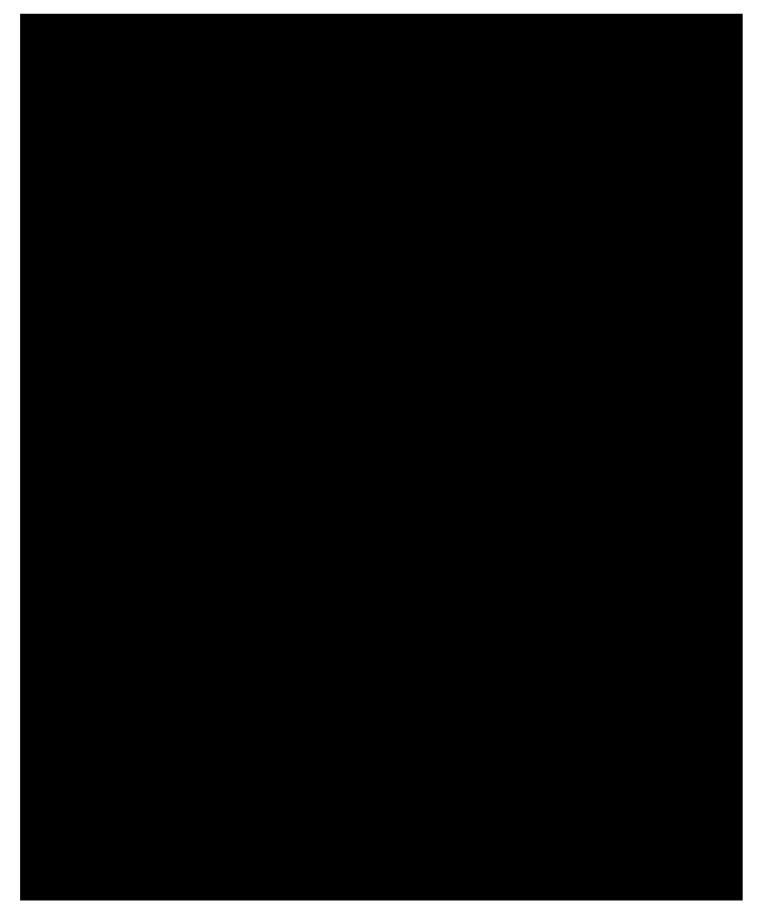
6. MUTUAL AID/MUTUAL ASSISTANCE

For the purposes of this EOP, mutual aid and mutual assistance are two distinct, but related concepts. Mutual aid is one entity lending assistance (personnel, materials, supplies, or equipment) across jurisdictional boundaries to another entity in an emergency with no expectation for reimbursement. The state and federal government are the prime providers of mutual aid to the BPUB.

Mutual assistance is the provision of resources to another entity in an emergency through established agreements with the expectation of reimbursement for the costs associated with that assistance. The BPUB has entered several agreements to provide and receive mutual assistance. In both instances, the primary objective is to facilitate rapid, short-term deployment of emergency support.

BPUB maintains perennial contracts with Lower Colorado River Authority, Austin Energy, Denton Utilities, South Texas Electric COOP, and the American Public Power Association (APPA). Every year before Hurricane Season or an Emergency, the Staging Area Manager contacts the Mutual Aid participants to discuss the mutual aid agreement and make sure that they are available to assist if they are not affected by the same emergency. If the Staging Area Manager determines that the BPUB needs outside assistance, they will coordinate with the IC to make any formal requests of outside utility assistance.



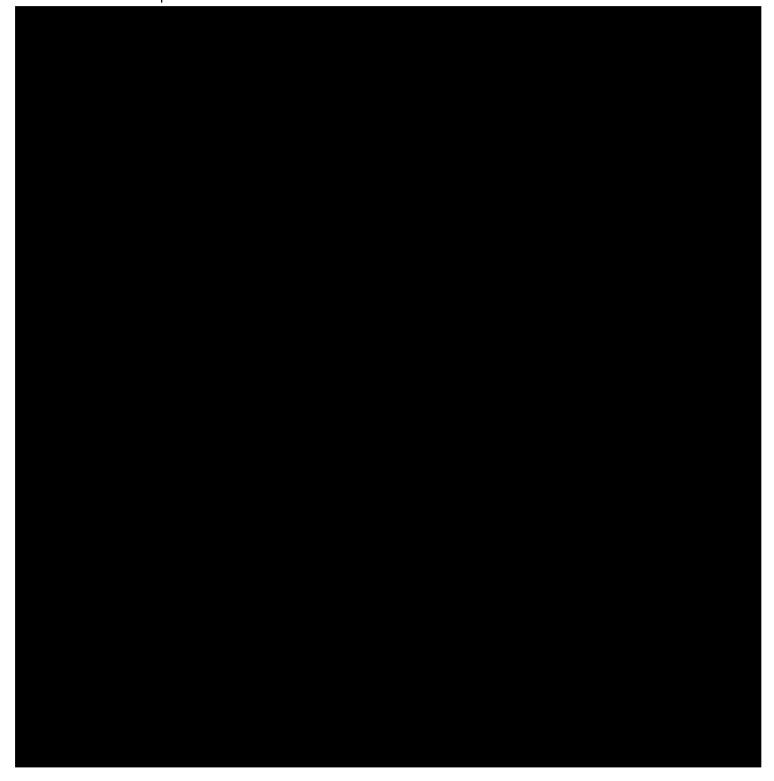


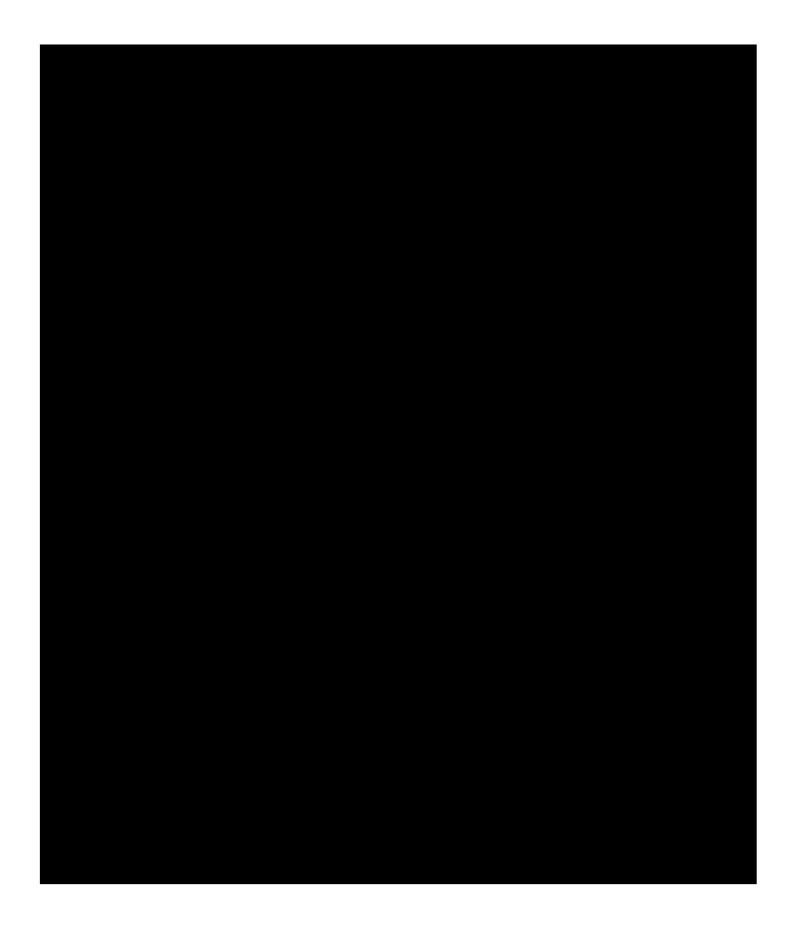




7. EMPLOYEE ASSIGNMENTS

Upon designation of a declared emergency event, employees should continue to report for duty at their regular locations and receive their EOP work assignments from their immediate supervisors.





8. EMERGENCY OPERATIONS CENTER

The BPUB Emergency Operations Center (EOC) is the primary coordination body for all response and recovery efforts, and when activated, requires representation by all divisions. The EOC is organized along ICS best practices to develop and execute response and recovery objectives. Organized in this way, the EOC efficiently facilitates internal and external communication and collaborative decision making. The EOC creates response strategies, ensures continuity of the organization, and tracks data and results and disseminates information.

The EOC serves as a coordination point for staff with emergency management assignments. It serves to coordinate communication with other members of the Emergency Operation Teams, external authorities and support, personnel and customers, vendors and utilities.

The EOC:

- 1. Supports the Incident Commander,
- 2. Provides advice and input for major decisions, and,
- 3. Implements action plans in a coordinated and effective way.

The location of the EOC must have the space and functionality to support an immediate full activation of the EOC with all positions staffed. It needs to be a safe, secure, and selectively accessible location with a reliable power supply and communication and internet hardware and connectivity. Supplies and equipment for the EOC should be identified in advance with appropriate checklists maintained ready. Use of the EOC will be exercised periodically.

BPUB activates an EOC depending upon the anticipated scale of the weather-related emergency, and regional impact to BPUB. The staffing includes representatives from all critical functions throughout BPUB to ensure adequate coordination and management of the event, which includes operations personnel and support personnel. The EOC will continue to remain operational until such a time as the Incident Commander declares that the EOC can operate at a reduced capacity or be stood down for return to normalized operations. The BPUB ICS Structure is shown in Table 8.1 below.

Table 8.1 BPUB Incident Command System Structure

Privileged and Confidential

EOC Organization

The EOC is staffed through best practices of NIMS which include a multi-tiered ICS emergency organization utilizing task specific emergency response functions that can be activated as needed. This model is scalable depending on the impact of the emergency. Organizing under the ICS is highly desirable in emergency response operations of all types and complexities. The ICS uses only those resources based on the incident and response level needed. It provides a common framework based on a flexible and scalable response organization. Flexibility and scalability of the ICS allows the BPUB to accommodate various staffing levels in responding to the different types and levels of emergencies.

Some general ICS guidelines and assumptions include:

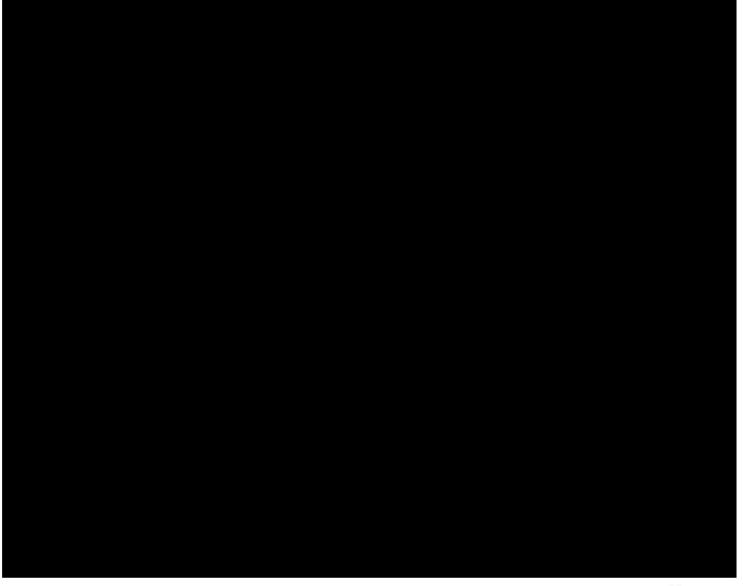
- ICS is flexible and should be viewed as a response tool, not a response rule.
- ICS is scalable to any magnitude of disaster and can include multiple agencies.
- One individual can fill multiple ICS functions, particularly in the early stages of an incident.
- ICS administration should not detract from response effort.
- Command Staff should possess emergency response decision-making authority.
- Training and exercising ICS is critical to its success.
- Other responding agencies also follow NIMS and ICS.
- All levels of the ICS organization may be fully or partially activated to accommodate the requirements of the emergency.

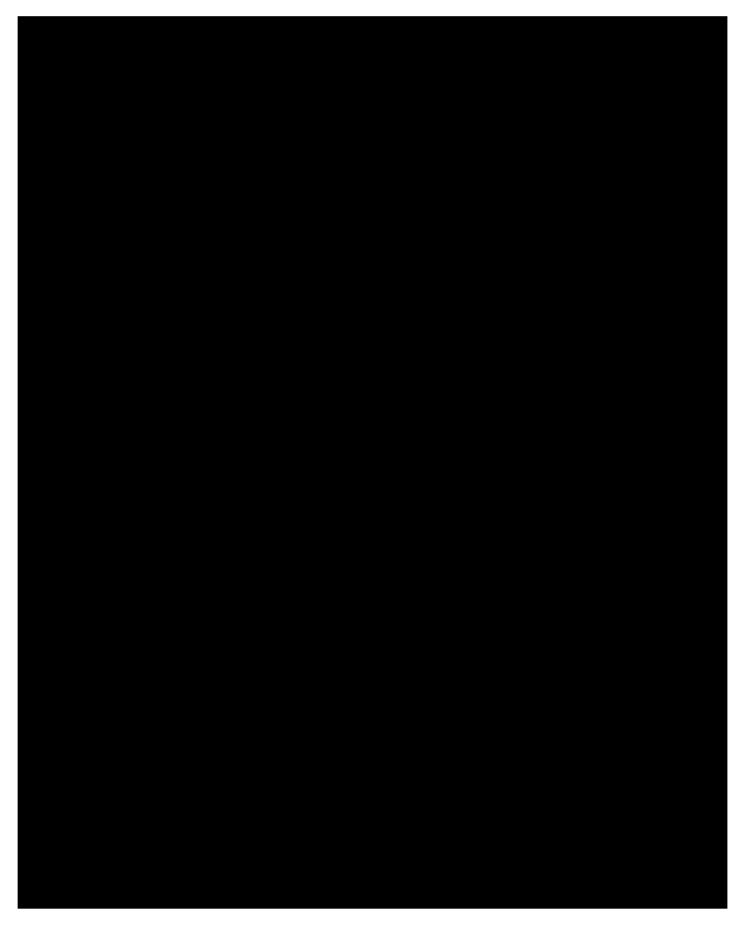
9. COMMUNICATIONS PLAN

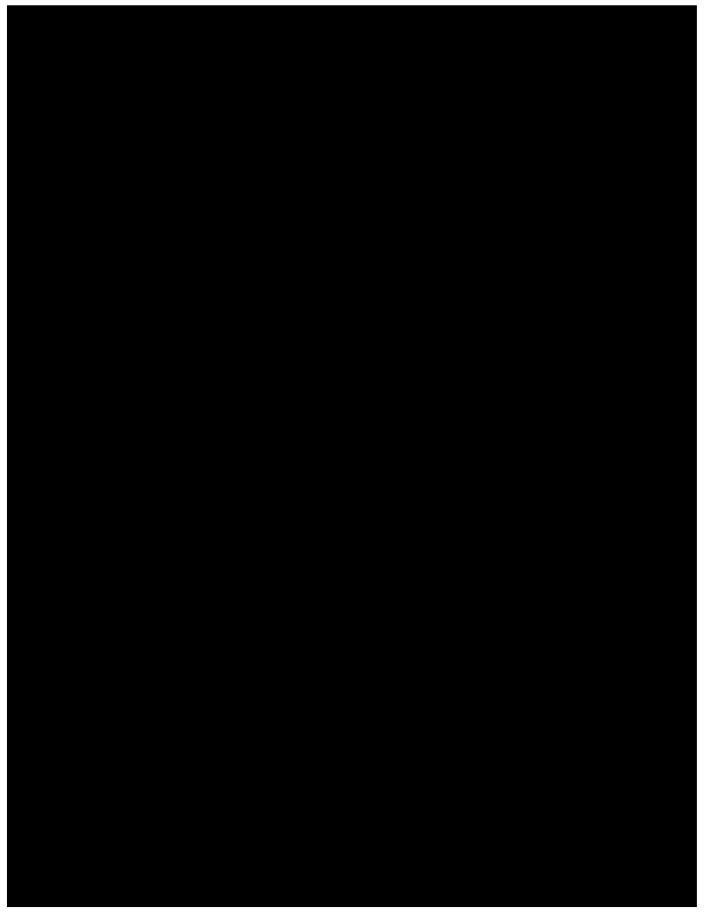
§25.53(D)(2)(A) - COMMUNICATIONS PLAN

BPUB management recognizes the importance of effective communication during the normal course of business, as well as during an emergency. Communication affects the development of events and shapes the crisis response. Crisis communications must therefore be considered an integral part of emergency management; a core function. The public expects credible organizations to communicate before, during and after a crisis, and inadequate communication has always aggravated crises and led to lack of confidence in public authorities and long-standing companies. It is vital to determine, depending on the type of crisis and resources available, how the crisis communications plan will be organized and run.

This Communications Plan pertains to Generation, Transmission, and Distribution operations.









10. PRE-ARRANGED SUPPLIES PLAN

§25.53(D)(3) - PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

This section of the EOP provides guidelines for the procurement, storage, and maintenance of supplies that BPUB may need during emergency events. BPUB maintains inventories to support on-going construction and operation of the electrical system, as well as emergency inventories, in the event of a natural disaster or disruptions of electrical service to customers. Plans are in place and monitored to assure inventory to replace transformers, circuit breakers, substations, and the various components of the transmission and distribution electrical infrastructure. In addition to the inventory necessary to support construction and maintenance projects, a dedicated separate emergency storm stock is maintained in warehouses throughout BPUB's service area.

Guidelines are included to provide BPUB personnel (and contractors) with sufficient supplies to support emergency operations during all types and levels of emergency events. The guidelines ensure a process to procure, store, and maintain supplies that may be needed during emergency events.

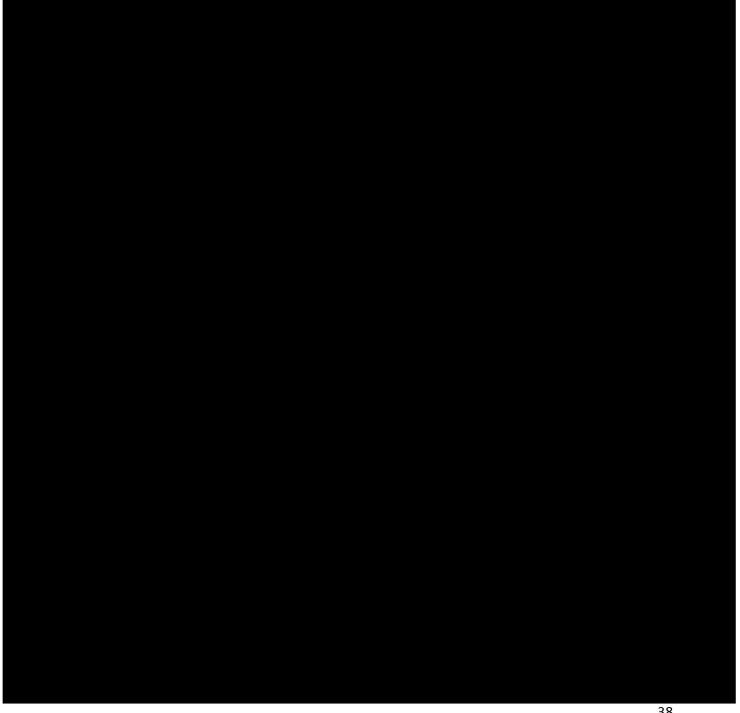
Agreements are maintained with suppliers for priority acquisition of critical inventory if needed in a major disaster. Mutual assistance agreements are maintained to obtain both emergency personnel and equipment if local resources have been expended. See the BPUB Mutual Assistance Agreement Procedure, MAA-100.

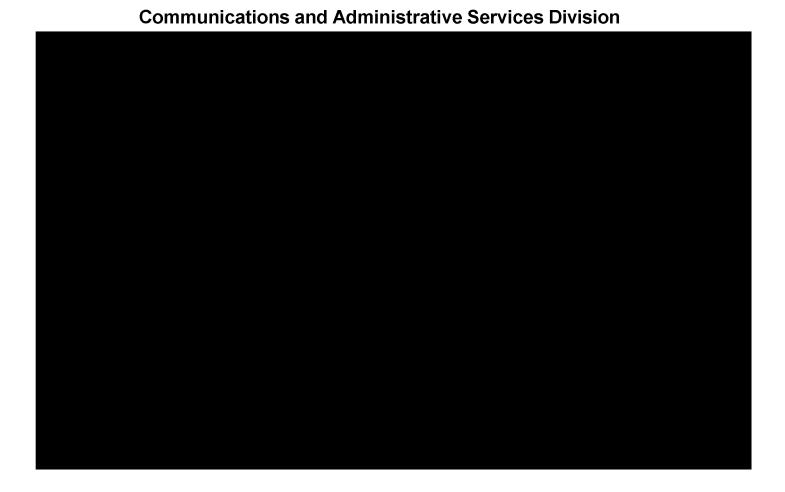
11. EMERGENCY STAFFING PLAN

§25.53(D)(4) - STAFFING DURING EMERGENCY RESPONSE

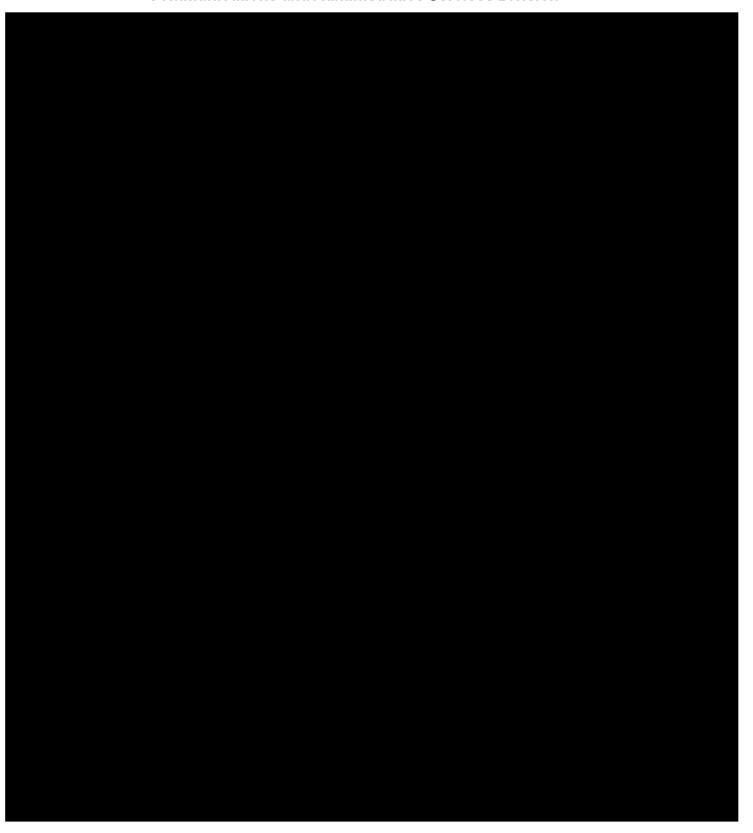
BPUB has a staffing plan for emergencies that addresses BPUB's Control Center, Operations, and other departments. BPUB's IC or designee is responsible for staffing all operations during an Emergency.

The GM or Assistant GM/COO may activate the EOP/EOC due to the following conditions:



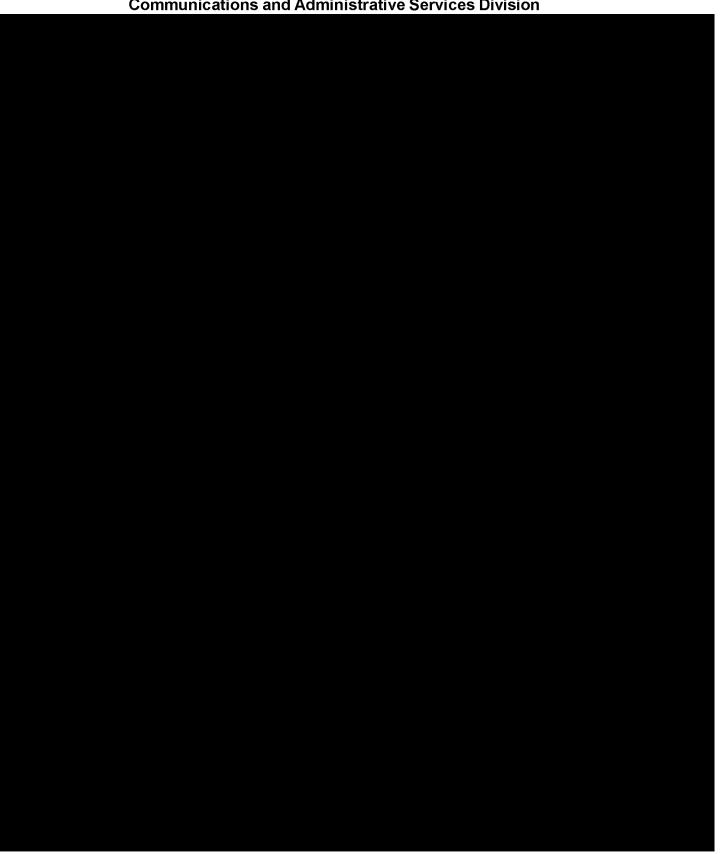


Actions Summary Communications and Administrative Services Division



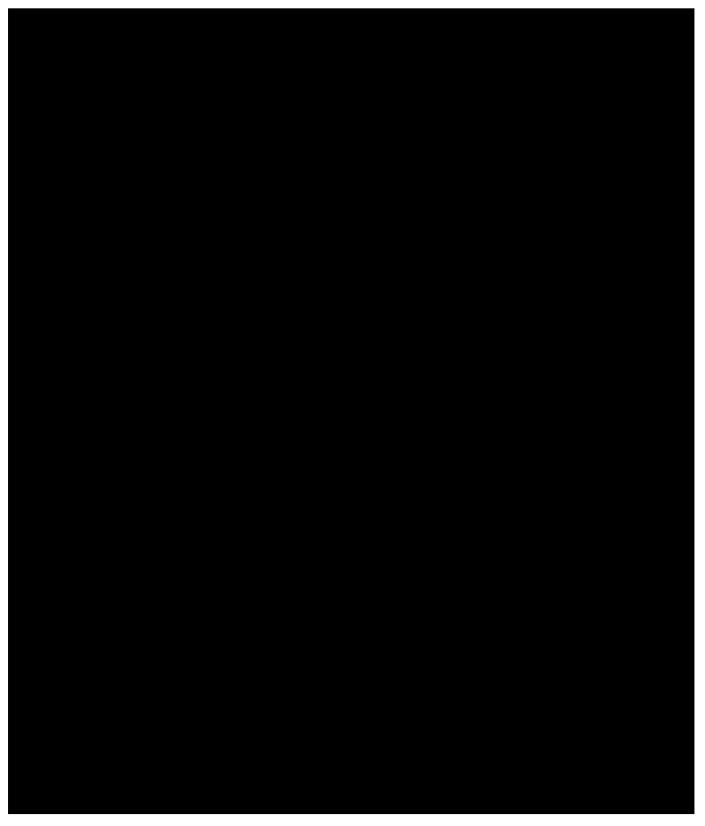


Actions Summary Communications and Administrative Services Division





Actions Summary Communications and Administrative Services Division

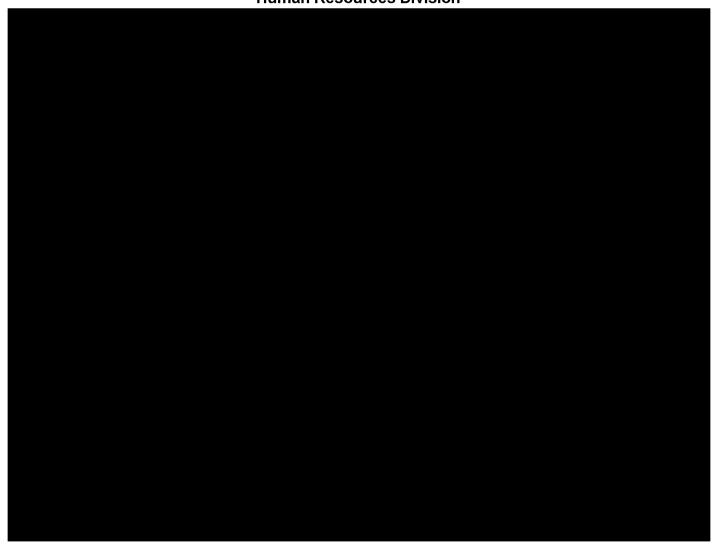




Human Resources Division



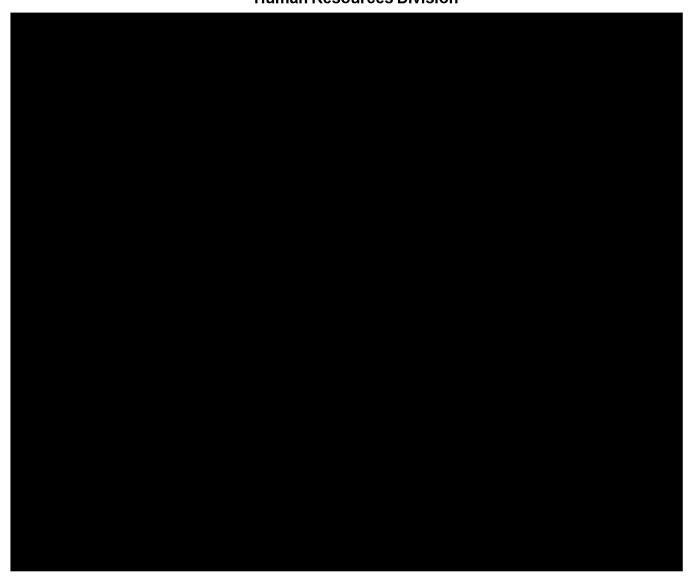
Actions Summary Human Resources Division

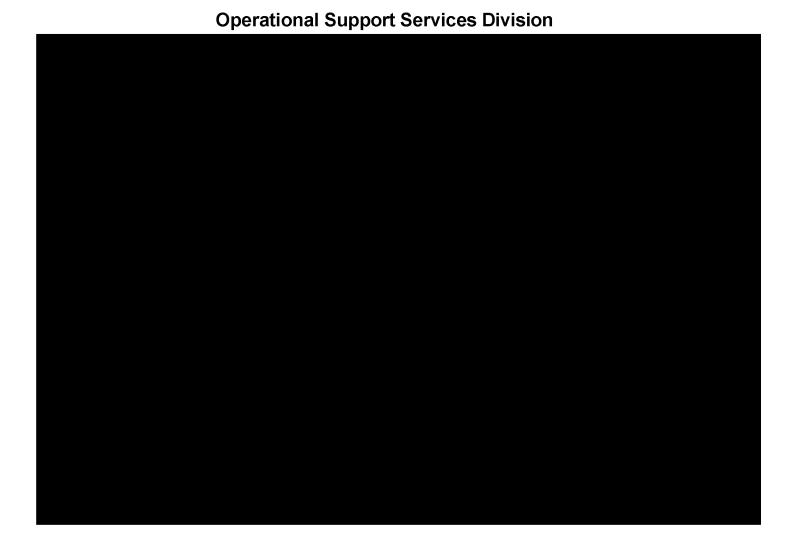


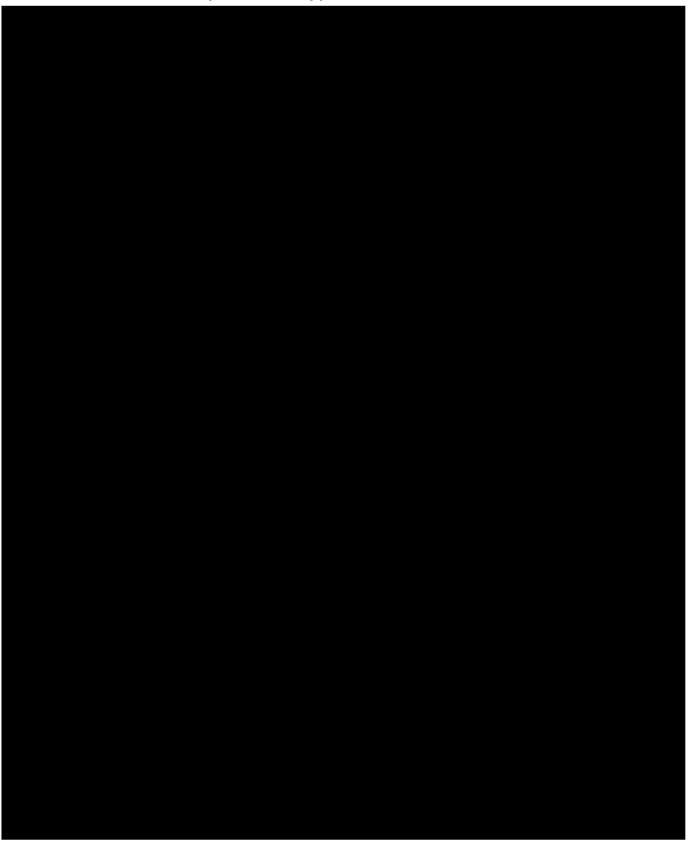
Actions Summary Human Resources Division



Actions Summary Human Resources Division



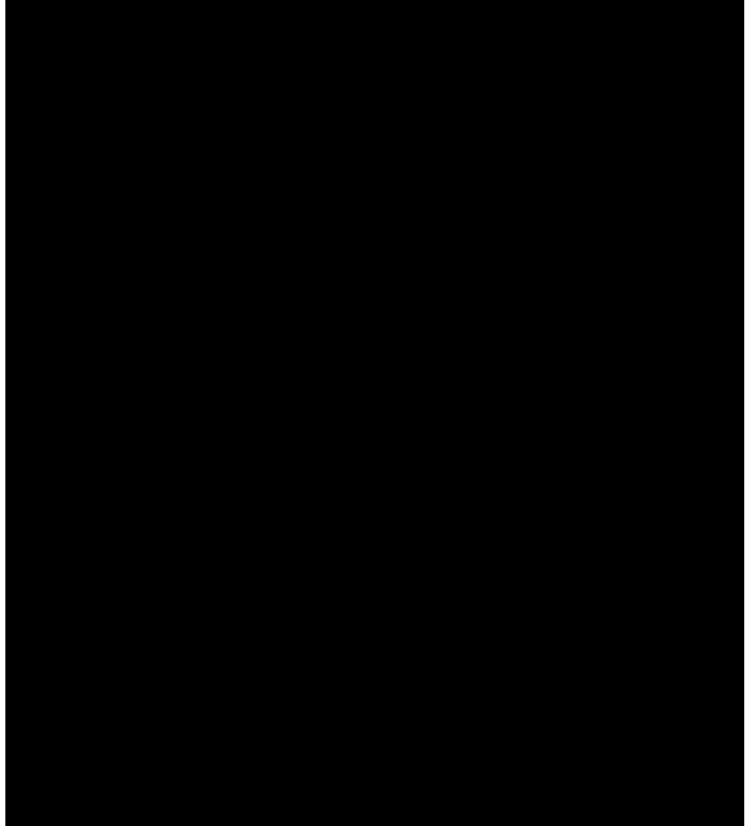




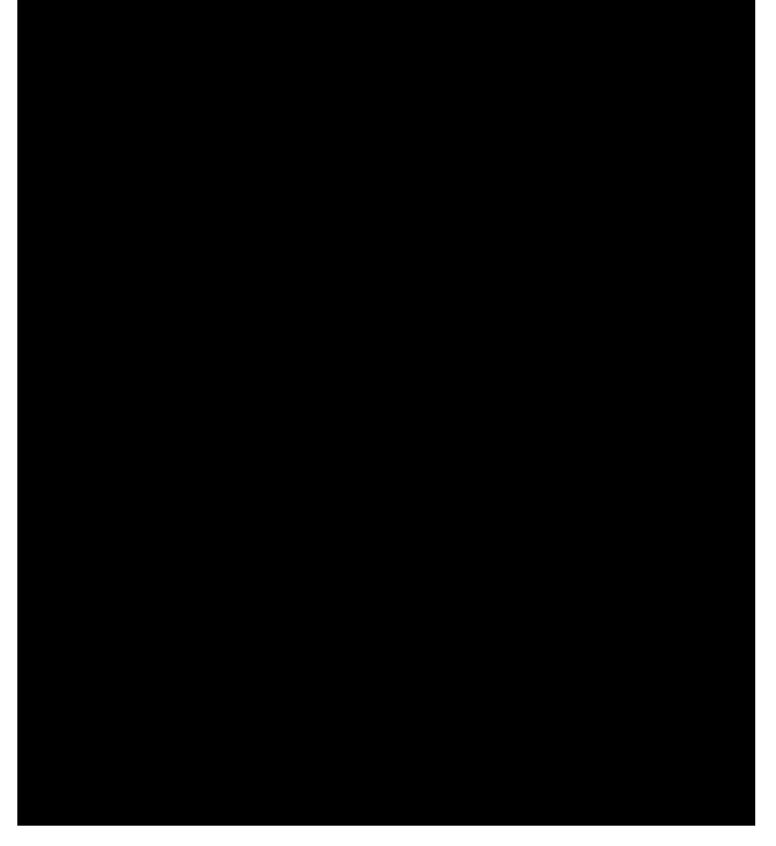






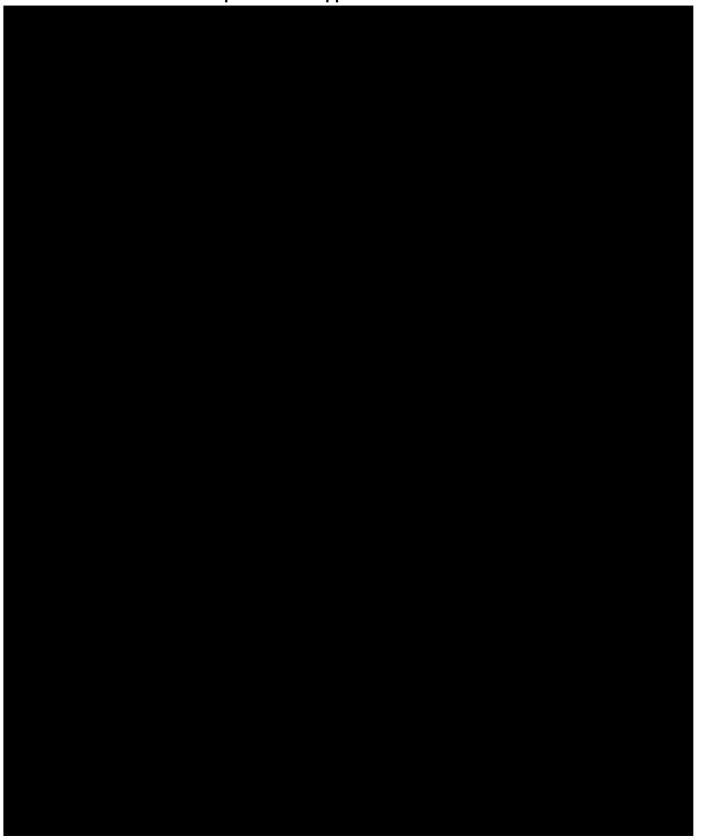


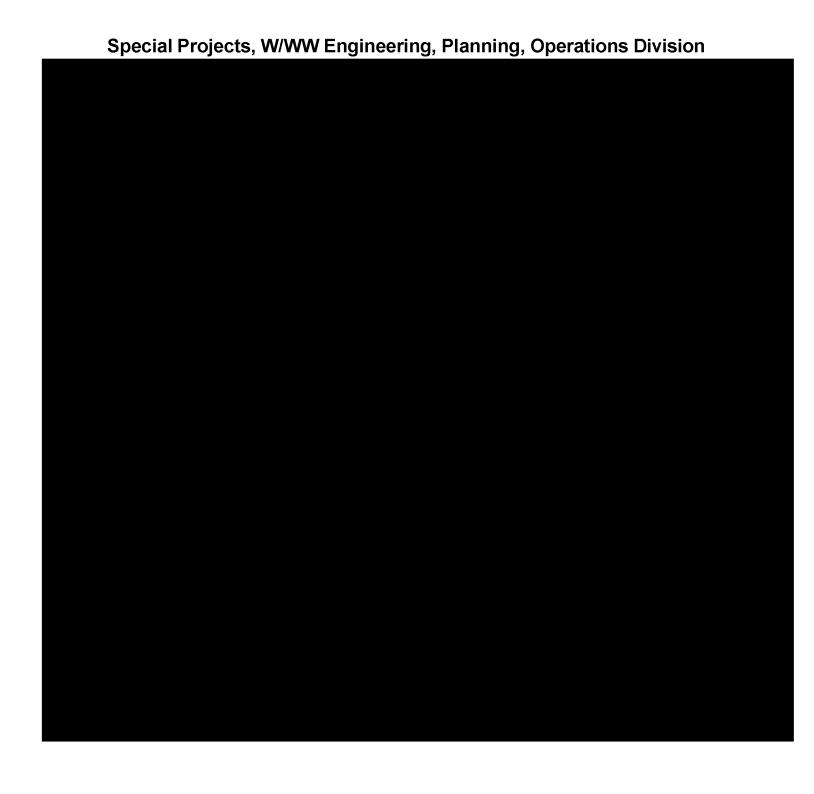




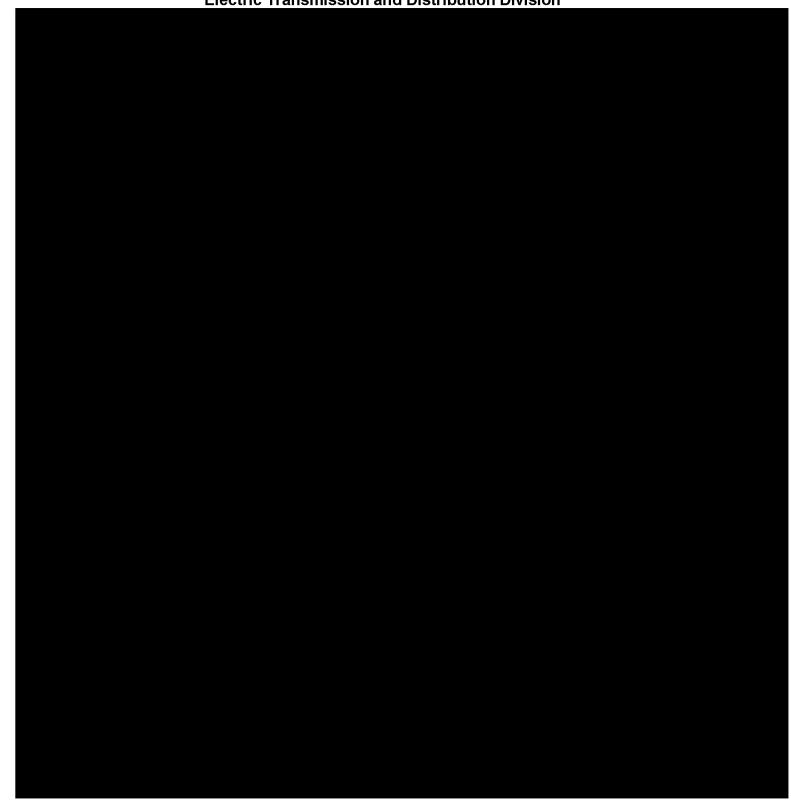


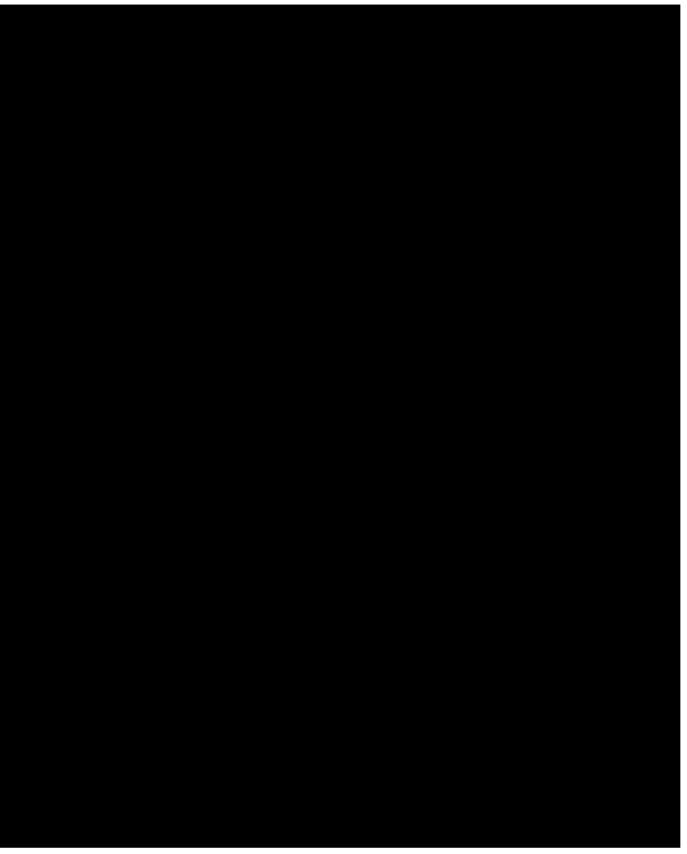


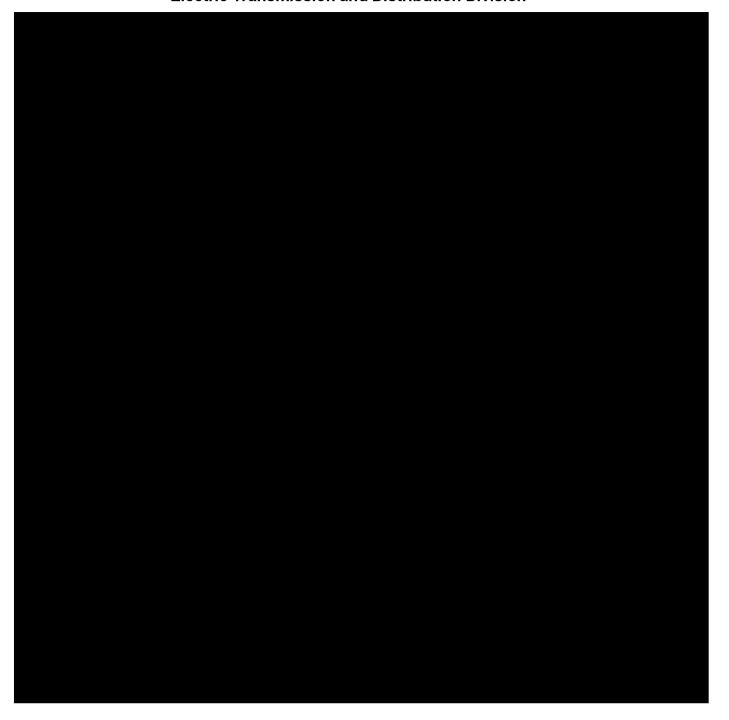


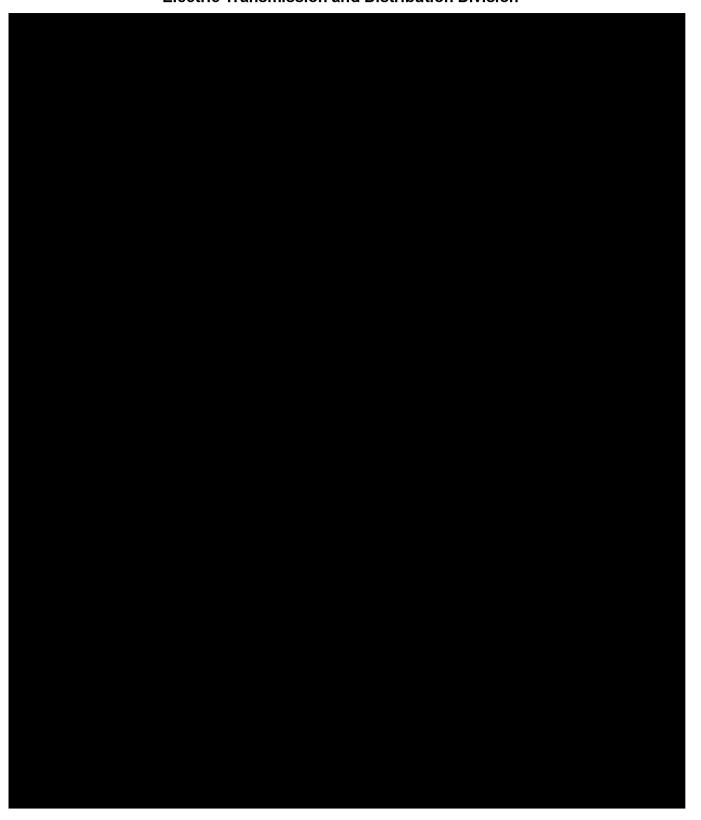


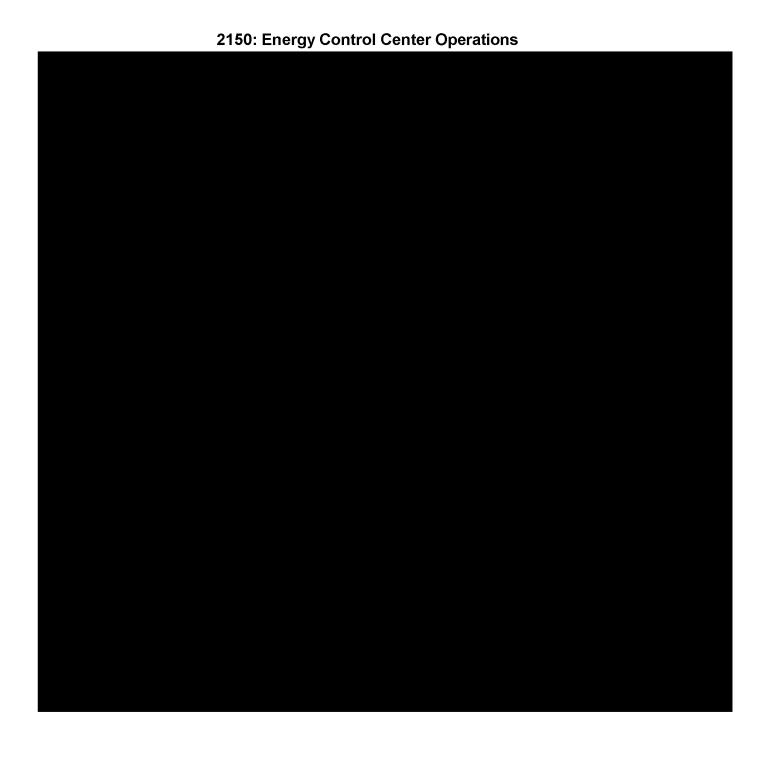
Electric Transmission and Distribution Division











2220: Power Production

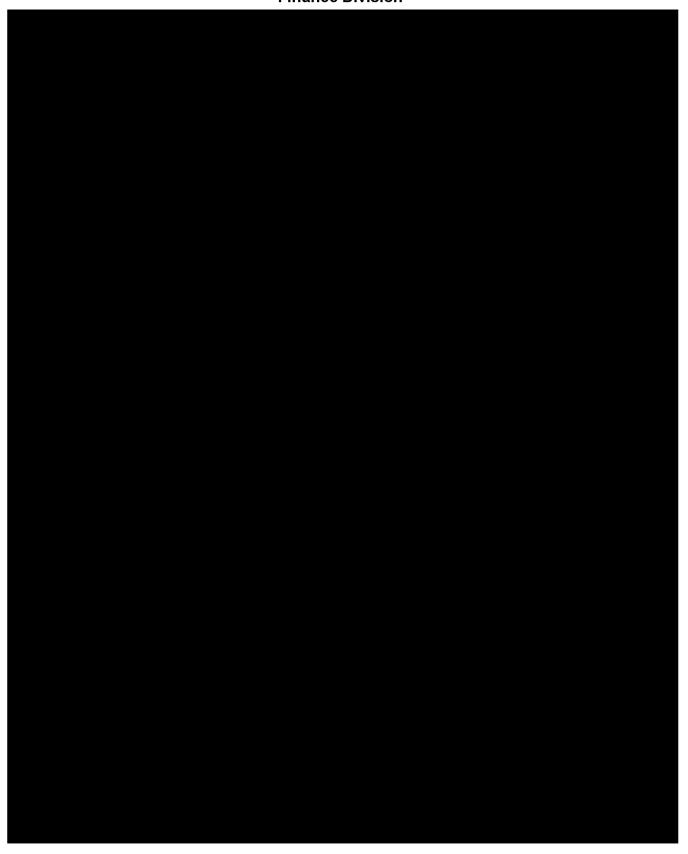


Finance Division

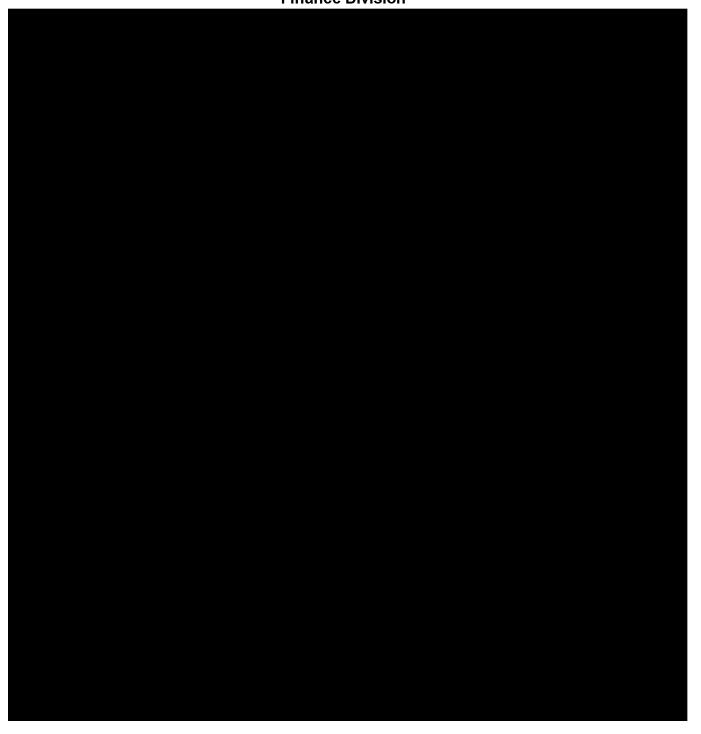


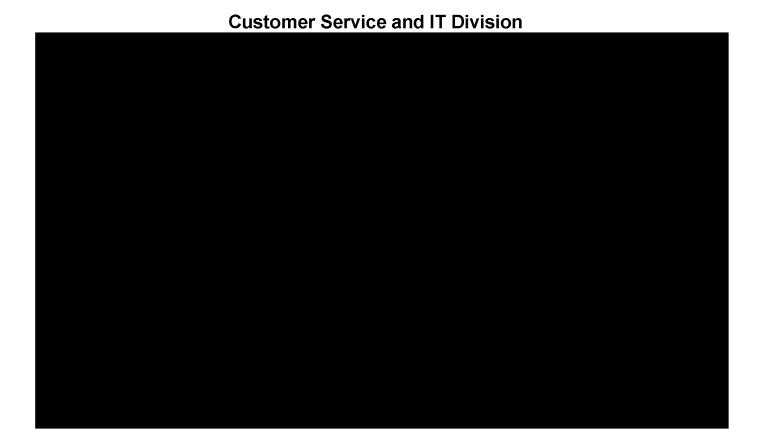


Actions Summary Finance Division

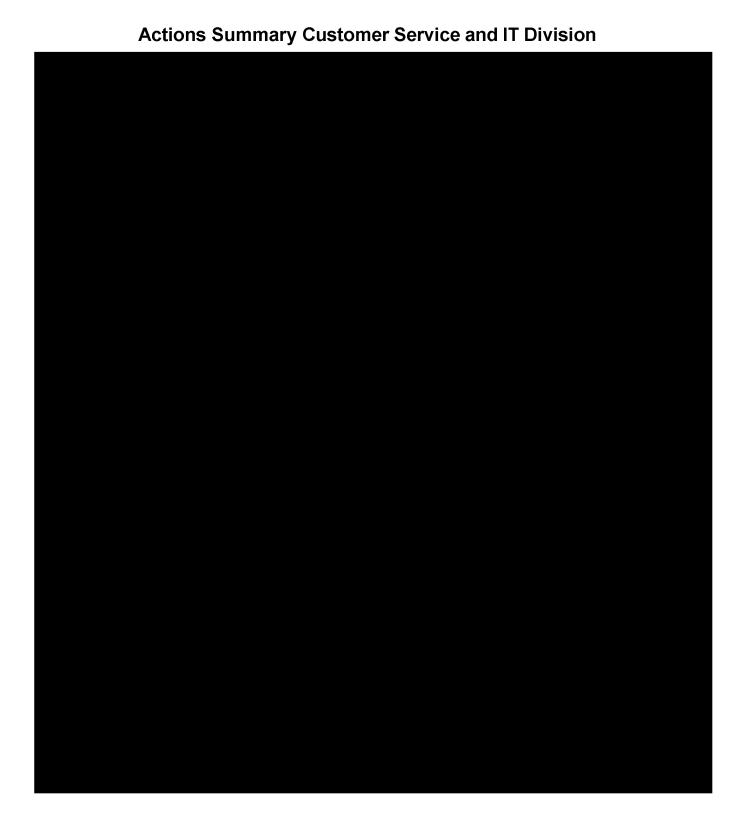


Actions Summary Finance Division











Environmental Services Division

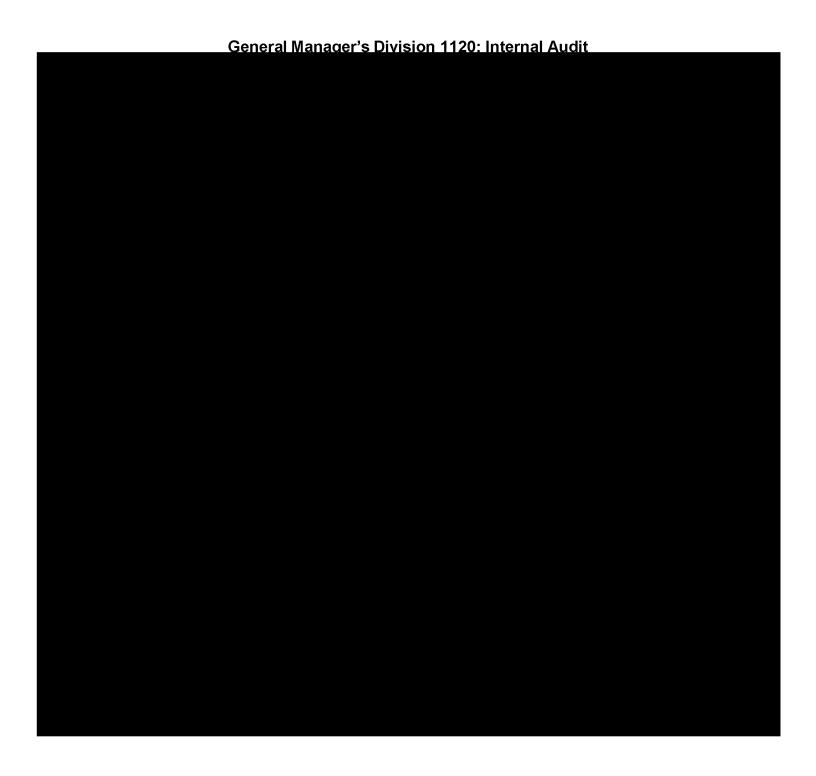


Actions Summary Environmental Services Division



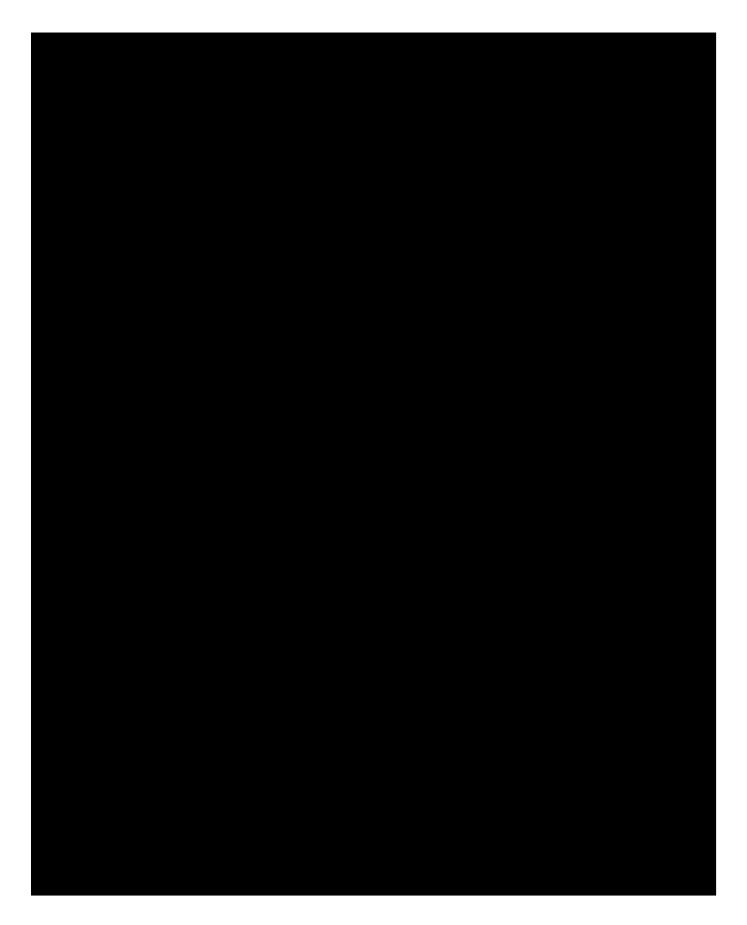
Actions Summary Environmental Services Division

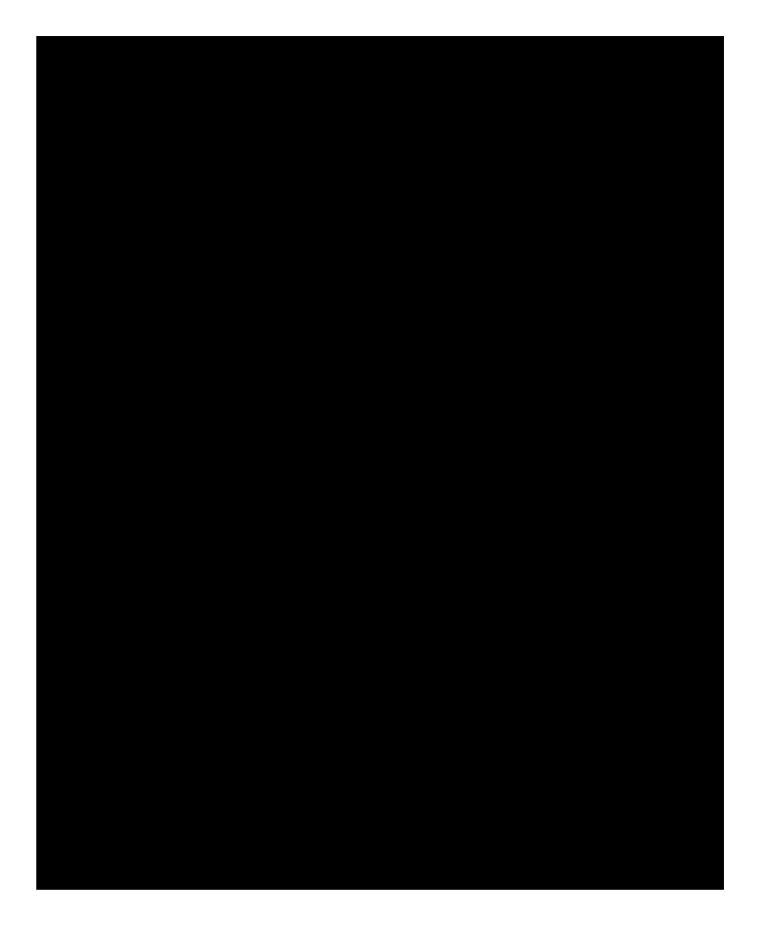




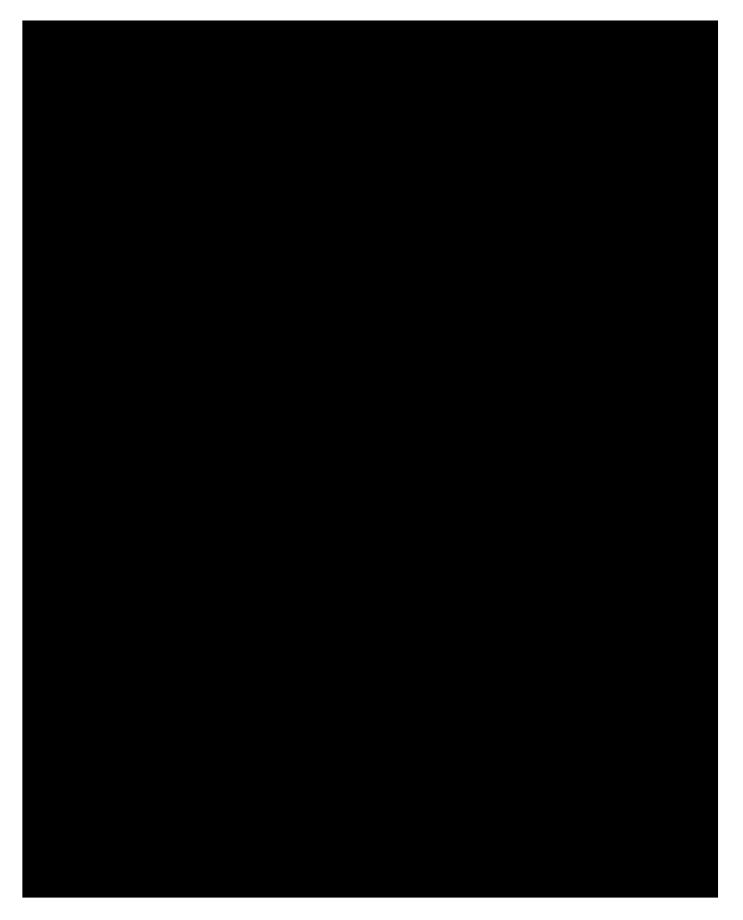
12. SEVERE WEATHER IDENTIFICATION

§25.53(D)(5) - IDENTIFICATION OF WEATHER-RELATED HAZARDS











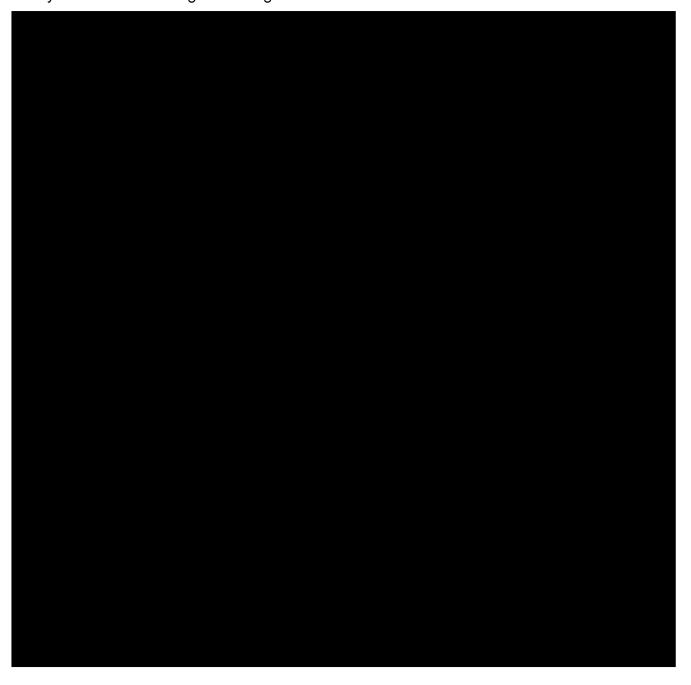
13. ANNEXES

13.1 Weather Emergency Plan

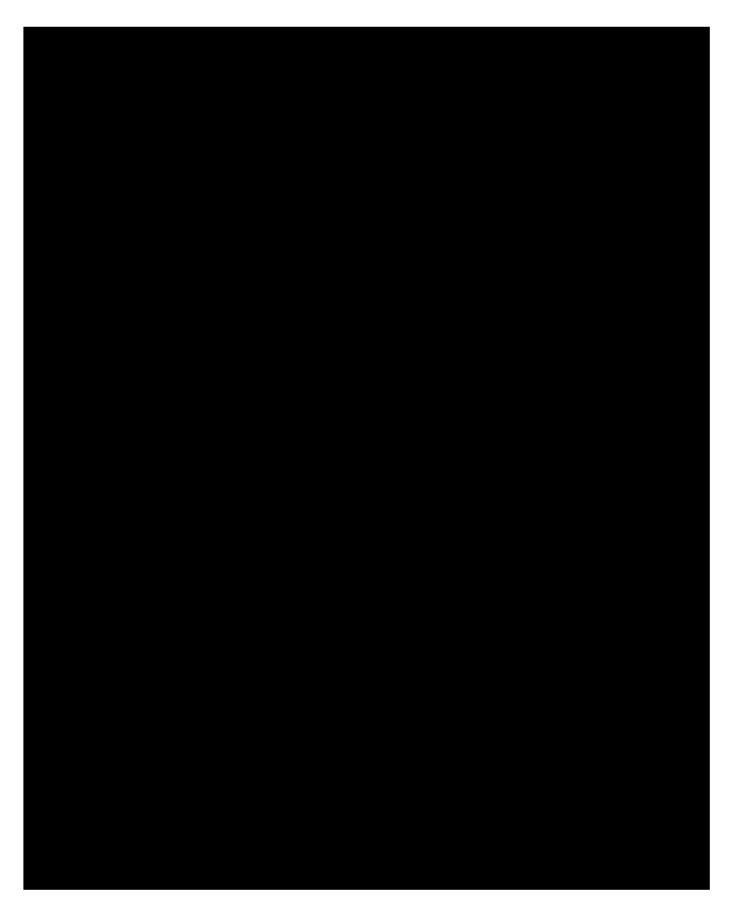
§25.53(e)(l)(A) - Weather Emergency Annex

§25.53(e)(l)(A)(ii) - Checklist for Personnel for Responding to Cold/Hot Weather Emergency

In the event of approaching severe weather, including extreme hot/cold temperatures, tornados, snow/ice storms, flooding, wildfires, high wind events, etc., the following procedure pertaining to generation and transmission operations shall be put into effect by the General Manager or designee:









13.2 Load Shedding Plan

§25.53(e)(l)(B) - Load Shed Annex

§25.53(e)(l)(B)(i) - Procedures for Controlled Shedding of Load

