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March 15, 2023

ELECTRONICALLY FILED Public Utility Commission of Texas 1701 N Congress Avenue PO Box 13326 Austin, TX 78711-3326

SENT VIA EMAIL The Electric Reliability Council of Texas (ERCOT) 8000 Metropolis Drive Building E, Suite 100 Austin, TX 78744

RE: 16 TAC § 25.53, ELECTRIC SERVICE EMERGENCY OPERATING PLAN

EXECUTIVE SUMMARY

PROENERGY Holding Company Inc. and its subsidiaries (collectively referred to as "PROENERGY"), established the Electric Service Emergency Operations Plan (EOP/Plan) to address power plant operations and response during Emergency Events.

Per the Texas Administrative Code §25.53, PROENERGY updated its Plan to reflect changes to roles and responsibilities within the Plan and relevant Annexes. The PROENERGY Plan contains procedures for addressing weather related and non-weather-related emergencies. Specific sections of the EOP that correspond to requirements of 16 Texas Administrative Code §25.53 are as follows:

PUCT 25.53		PROENERGY EOP		Description	
(d)	(1)	(A)	Page 2	Section 1	EOP introduction and applicability
(d)	(1)	(B)	Page 2 and 3	Section 2	EOP roles and responsibilities
(d)	(1)	(C)	Page 3	Section 2	Revision control
(d)	(1)	(D) (E)	Page 2 and 3	Section 2	Dated statements
(d)	(2)	(B)		Section 8, Annex H	Communications Plan
(d)	(3)		Page 7	Section 5	Pre-identified supplies for emergency response
(d)	(4)		Page 6	Section 5	Staffing during an emergency response
(d)	(5)		Page 5	Section 5	Identification of emergencies and activation of EOP
(d)	(6)		Page 8	Section 8	Relevant Annexes
(f)			Page 7	Section 6	Drills

PROENERGY

Contacts for questions, emergencies, and requests regarding the PROENERGY Plan are as follows:

Contact Priority	Name	Title	Phone	Email
Primary	Kevin Chaffin	Director, Operations and Maintenance	806-215-5581	kchaffin@proenergyservices.com
Backup	Jennifer Coleman	Director, Regulatory Compliance	315-796-7207	jcoleman@proenergyservices.com
Backup	Jaymes Martens	Plant Superintendent	209-321-5918	jmartens@proenergyservices.com

Record of Distribution of the PROENERGY EOP is as follows:

Name	Title	Date of Access
Jaymes Martens	Plant Superintendent	March 15, 2023
Larry Knepp	Plant Superintendent	March 15, 2023
Ty Bowling	Plant Superintendent	March 15, 2023
Charles Green	O&M Supervisor	March 15, 2023
Izzat Figueroa	O&M Supervisor	March 15, 2023
Johnny Perez	O&M Supervisor	March 15, 2023
Michael Butler	O&M Supervisor	March 15, 2023
Corey Bohanna	O&M Supervisor	March 15, 2023
Michael Wadel	O&M Technician	March 15, 2023
Delfino Mazariegos	O&M Technician	March 15, 2023
Munir Alzaghari	O&M Technician	March 15, 2023
Brian Spurlock	O&M Technician	March 15, 2023
Ryan Follis	O&M Technician	March 15, 2023
Clint Mikeska	O&M Technician	March 15, 2023
Donald Moran	O&M Technician	March 15, 2023
Jerome Lowe	O&M Technician	March 15, 2023
Tony Cotterell	O&M Technician	March 15, 2023
Julio Moreno	O&M Technician	March 15, 2023
Chris Sharpless	CEMS Technician	March 15, 2023
Ron Kirkland	CEMS Technician	March 15, 2023
Josue Gonzalez	I&C Technician	March 15, 2023
Michael Wingate	I&C Technician	March 15, 2023
Kyle Rogers	O&M Technician	March 15, 2023
Noe Valdez	O&M Technician	March 15, 2023
Sergio Casas	O&M Technician	March 15, 2023

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Chad Hall	ROC Manager	March 15, 2023
Zach Acreman	Control Room Operator	March 15, 2023
Brian Bousquet	Control Room Operator	March 15, 2023
Humberto Figueroa	Control Room Operator	March 15, 2023
Damon Sabella	Control Room Operator	March 15, 2023
Tray Bussey	Control Room Operator	March 15, 2023
John Smith	Control Room Operator	March 15, 2023
Henry Carter	Control Room Operator	March 15, 2023
Kevin Hartung	Control Room Operator	March 15, 2023
Travis Heinrich	Control Room Operator	March 15, 2023
Robert van Benthuysen	Director Health and Safety	March 15, 2023
Kevin Chaffin	Director of O&M	March 15, 2023
Jennifer Coleman	Director of Regulatory Compliance	March 15, 2023
John Stevens	SVP Aero Advantage	March 15, 2023
Brian Roth	VP O&M	March 15, 2023
Mike Alvarado	President	March 15, 2023
Cliff Oliver	VP Asset Management	March 15, 2023
Chris Evans	VP Marketing	March 15, 2023
Tina Lee	VP Asset Management	March 15, 2023

PROENERGY

ELECTRIC SERVICE EMERGENCY OPERATIONS PLAN SWORN ATTESTATION

STATE OF TEXAS COUNTY OF HARRIS

Before me, the undersigned authority, on this day, personally, and who, after being duly sworn, stated he is entitled to make this Sworn Attestation, and the statements contained below are based on personal knowledge and true and correct.

I, Mike Alvarado, swear or affirm the following on behalf of the below entities and generation resources, operating within the state of Texas.

I attest all activities described in 16 Texas Administrative Code §25.53(c)(3)(A) have been completed for the below-identified Generation Resources. Further, I attest that the statements contained in the Electric Service Emergency Operations (EOP) Plan (Plan) are true and accurate. In addition, relevant operation personnel are familiar with and received training on the applicable contents and execution of the Plan 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; drills have been conducted to the extent required by subsection (f); the EOP or an appropriate summary has been distributed to local jurisdictions as needed; a business continuity plan addresses returning to normal operations after disruptions caused by an incident; and the entity'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 training.

Entities:

HO Clarke Generating, LLC and HO Clarke II, LLC

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- Topaz Generating, LLC and Topaz II, LLC
- Braes Bayou Generating, LLC and Braes Bayou II, LLC
- Mark One Generating, LLC and Mark One II, LLC
- Brotman Generating, LLC and Brotman II, LLC
- Remy Jade Generating, LLC and Remy Jade II, LLC

Generation Resources:

- HO Clarke (PRO) Unit 1 through Unit 6 and HO Clarke II (PRO) Unit 7 and Unit 8
- Topaz (TPZ) Unit 1 through Unit 7 and Topaz II (TPZ) Unit 8 through Unit 10
- Braes Bayou (RAB) Unit 3 through Unit 8 and Braes Bayou II (RAB) Unit 1 and Unit 2
- Mark One (BCH) Unit 1 through Unit 6 and Mark One II Unit 7 through 10
- Brotman (BTM) Unit 1 through Unit 6 and Brotman II (BTM) Unit 7 and Unit 8
- Remy Jade Unit 1 through 6 and Remy Jade II Unit 7 through 10

Mike Alvarado, President

WattBridge Texas, LLC

Sworn before me on this 13 day of March 2023

Notary Public Signature and Seal

ADNAN DOHADWALA Notary ID #133982644 My Commission Expires September 23, 2026