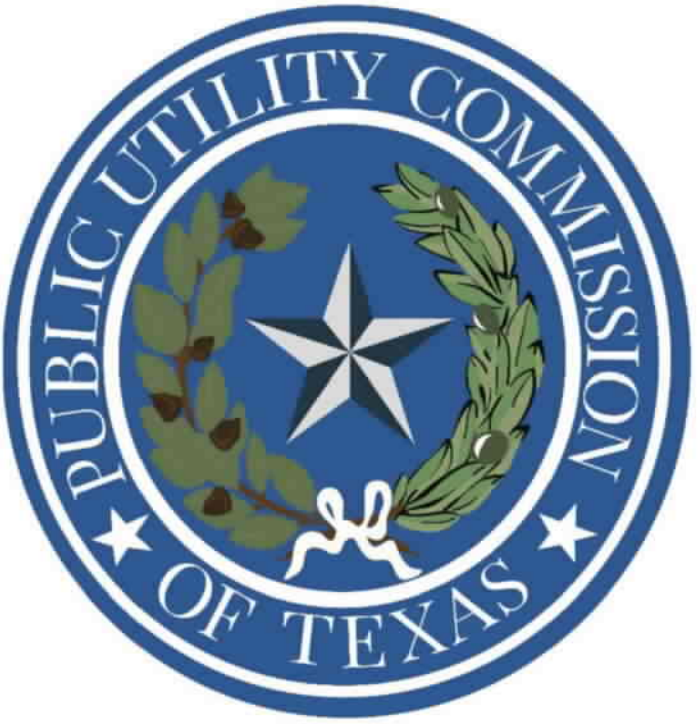

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PROJECT NO. 53385

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

ST. GALL ENERGY STORAGE I LLC'S EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, St. Gall Energy Storage I LLC ("St. Gall Energy Storage I") hereby files an executive summary of its emergency operations plan known as the Emergency Action Plan (the "Plan"), which describes the contents and policies contained in the Plan, includes references to specific sections and page numbers of the Plan that correspond with the requirements of 16 TAC § 25.53, includes the Plan's record of distribution, and attaches the required affidavit and a redacted copy of the Plan. St. Gall Energy Storage I is a registered power generation company and a wholly owned subsidiary of Jupiter Power LLC. The St. Gall Energy Storage I facility is a battery energy storage system. St. Gall Energy Storage I's Plan is an omnibus plan of Jupiter Power LLC with appropriate site-specific information incorporated.

A. Contents and Policies (16 TAC § 25.53(c)(1)(A)(i)(I))

Attachment A to this Executive Summary is a redacted copy of St. Gall Energy Storage I's Emergency Action Plan. The purpose of the Plan is to outline and provide general guidelines for evaluating and responding to known and potential hazards or emergency conditions at the St. Gall Energy Storage I site. The Plan provides directions and response to any emergency condition for all employees and visitors. The Plan provides guidelines for emergencies that include spills, fires, explosions, bomb threats, and personnel injuries. All employees shall be trained in the actions that are to be taken should an emergency occur. Relevant elements of this Plan will be communicated to all visitors during their Site Safety Orientation Training.

The Plan contains the following sections:

Content/Policies	Plan Reference
Purpose and Applicability	Section 1.1, page 3
Approval	Section 1.2, page 3

Content/Policies	Plan Reference
Review and Updates	Section 1.3, page 3
Revision Control Summary	Section 1.4, page 4
Reporting Requirements	Section 1.5, page 4
Annual Drill Requirements	Section 1.6, page 4
Responsibilities	Section 2, pages 5-7
Definitions	Section 3, page 7
Communications Plan	Section 4, page 8
Emergency Response Equipment Locations	Section 5.1, page 8
Pandemic and Epidemic Preparedness Plan	Section 5.2, page 8
Critical Site Failure Points	Section 5.3, page 9
Notification Requirements	Section 5.4, page 9
Site Evacuation	Section 5.5, pages 9-10
Severe Weather and Natural Disasters	Section 5.6, page 10
Equipment Weatherization	Section 5.6.1, pages 10-11
Earthquakes	Section 5.6.2, pages 11-12
Flooding	Section 5.6.3, page 12
Landslides	Section 5.6.4, page 13
Tornadoes	Section 5.6.5, pages 13-14
Thunderstorms	Section 5.6.6, page 14
Extreme Heat	Section 5.6.7, pages 14-15
Winter Storms and Extreme Cold	Section 5.6.8, pages 15-17
Hurricanes	Section 5.6.9, page 17
After Severe Weather and Natural Disasters	Section 5.6.10, pages 17-18
Fire Emergencies	Section 5.7, pages 18-19
Medical Emergencies	Section 5.8, page 19
Bloodborne Pathogens	Section 5.9, page 20
Arc Flash Incident – LV/HV Electrical Shock	Section 5.10, pages 20-21
Bomb/Terroristic Threats	Section 5.11, pages 21-22

Content/Policies	Plan Reference
Active Shooters	Section 5.12, pages 22-23
Cybersecurity	Section 5.13, page 24
Spill Response	Section 5.14, pages 24-25
Recovery Priorities	Section 5.15, page 25
Fuels	Section 5.16, page 26
Physical Security	Section 5.17, page 26
Water Shortage	Section 5.18, page 26
References	Section 6, page 27
Site Map Orientation Summary Sheet	Section 7.1, Appendix A, page 28
Site Specific Information	Section 7.2, Appendix B, page 29
Site Emergency Contact Sheet	Section 7.3, Appendix C, pages 30-31
Site Visitors Log	Section 7.4, Appendix D, page 32
Site Plan Record of Distribution	Section 7.5, Appendix E, page 33

B. Record of Distribution (16 TAC §§ 25.53(c)(1)(A)(i)(III) and 25.53(c)(4)(A))

The Plan's record of distribution required by 16 TAC § 25.53(c)(4)(A) is included at Appendix E of the Plan and is also described below consistent with 16 TAC § 25.53(c)(1)(A)(i)(III).

As described in Section 2.3, pages 5-6 of the Plan, all site personnel and site visitors receive training appropriate to the level of their assigned roles through various methods that include an initial orientation, regularly scheduled safety meetings, review of the safety procedures, and formal training programs. A non-redacted record of distribution will be made available to Commission Staff upon request.

C. Affidavit (16 TAC §§ 25.53(c)(1)(A)(i)(IV) and 25.53(c)(4)(C))

Attachment B to this Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

D. Emergency Contact List (16 TAC § 25.53(c)(4)(B))

Section 7.3, Appendix C contains the Plan's emergency contact information required by 16 TAC § 25.53(c)(4)(B).

The primary and backup emergency contact for St. Gall Energy Storage I who can immediately address urgent requests and questions from the Commission during an emergency are identified in Section 7.3, Appendix C and will be made available to Commission Staff upon request.

E. Common Operational Functions Relevant Across Emergency Types (16 TAC § 25.53(d))

In addition to those items explicitly listed in 16 TAC § 25.53, the Plan addresses common operational functions relevant across emergency types, including:

Content/Policies	Plan Reference
Responsibilities	Section 2, pages 5-6
Definitions	Section 3, page 7
Critical Site Failure Points	Section 5.3, page 9
Notification Requirements	Section 5.4, page 9
Site Evacuation	Section 5.5, pages 9-10
Equipment Weatherization	Section 5.6.1, pages 10-11
References	Section 6, page 27
Site Map Orientation Summary Sheet	Section 7.1, Appendix A, page 28
Site Specific Information	Section 7.2, Appendix B, page 29
Site Visitors Log	Section 7.4, Appendix D, page 32

F. Approval and Implementation (16 TAC § 25.53(d)(1))

Content/Policies	Plan Reference	Rule Reference
Introduction of Plan and outline of its applicability	Section 1.1, page 3	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the Plan, and those who can change the Plan	Section 1.3, page 3 Section 2, page 5	16 TAC § 25.53(d)(1)(B)

Content/Policies	Plan Reference	Rule Reference
Revision control summary that lists the dates of each change made to the Plan since the initial Plan was adopted, including the changes made to conform to the new 16 TAC § 25.53 adopted on February 25, 2022	Section 1.4, page 4	16 TAC § 25.53(d)(1)(C)
Dated statement that the current Plan supersedes previous plans	Section 1.2, page 3 Issued Date in header	16 TAC § 25.53(d)(1)(D)
Date the Plan was most recently approved by St. Gall Energy Storage I	Issued Date in header	16 TAC § 25.53(d)(1)(E)

G. Communication Plan (16 TAC § 25.53(d)(2)(B))

Section 4, Section 5.4, Section 7.3 (Appendix C) combine to describe the procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.

H. Emergency Supply Plan (16 TAC § 25.53(d)(3))

Section 5.1, page 8 describes St. Gall Energy Storage I's plan to maintain pre-identified supplies for emergency response.

I. Emergency Staffing Plan (§ 25.53(d)(4))

Section 2, pages 5-7 describes St. Gall Energy Storage I's plan to address staffing emergency response.

J. Weather Related Hazards (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))

Section 5.6, pages 10-18 of the Plan includes St. Gall Energy Storage I's plans for monitoring and responding to severe weather as outlined below:

Content/Policies	Plan Reference	Rule Reference
Flooding	Section 5.6.3, page 12	16 TAC § 25.53(d)(5)

Content/Policies	Plan Reference	Rule Reference
Landslides	Section 5.6.4, page 13	16 TAC § 25.53(d)(5)
Tornadoes	Section 5.6.5, pages 13-14	16 TAC § 25.53(d)(5)
Thunderstorms	Section 5.6.6, page 14	16 TAC § 25.53(d)(5)
Extreme Heat, including • operational plans for responding to a hot weather emergency distinct from the weather preparations required under 16 TAC § 25.55 • checklist for generation resource personnel to use during a hot weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency	Section 5.6.7, pages 14-15	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)
Winter Storms and Extreme Cold, including • operational plans for responding to a cold weather emergency distinct from the weather preparations required under 16 TAC § 25.55 and • checklist for generation resource personnel to use during a cold weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency	Section 5.6.8, pages 15-17	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)

As stated in Section 5.16, page 26, the Plan does not include a verification of the adequacy and operability of fuel switching equipment, because the St. Gall Energy Storage I facility is a battery energy storage system that does not consume fuels. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply to St. Gall Energy Storage I.

K. Water Shortage (16 TAC § 25.53(e)(2)(B))

As stated in Section 5.18, page 26, the Plan does not include a water shortage annex, because the St. Gall Energy Storage I facility is a battery energy storage system that does not rely on or require water to operate. Therefore, 16 TAC § 25.53(e)(2)(B) requiring a water shortage annex does not apply to St. Gall Energy Storage I.

L. Restoration of Service (16 TAC § 25.53(e)(2)(C))

Section 5.15, page 25 identifies St. Gall Energy Storage I's plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat.

M. Pandemic and Epidemic (16 TAC § 25.53(e)(2)(D))

Section 5.2, page 8 addresses St. Gall Energy Storage I's pandemic and epidemic emergency response plan.

As stated in Section 5.6.9, page 17, the St. Gall Energy Storage I facility is not located in a hurricane evacuation zone. Therefore, 16 TAC § 25.53(d)(5) requiring a plan that addresses how an entity identifies hurricanes and 16 TAC § 25.53(e)(2)(E) requiring a hurricane annex does not apply to St. Gall Energy Storage I.

N. Cyber Security (16 TAC § 25.53(e)(2)(F))

Section 5.13, page 24 contains St. Gall Energy Storage I's cyber security annex.

O. Physical Security Incident (16 TAC § 25.53(e)(2)(G))

Section 5.17, page 26 contains St. Gall Energy Storage I's physical security annex.

P. Appropriate Additional Annexes (16 TAC § 25.53(e)(2)(H))

The following list provides additional sections of St. Gall Energy Storage I's Plan that are appropriate for the St. Gall Energy Storage I facility:

Content/Policies	Plan Reference
Critical Site Failure Points	Section 5.3, page 9
Notification Requirements	Section 5.4, page 9
Site Evacuation	Section 5.5, pages 9-10
Equipment Weatherization	Section 5.6.1, pages 10-11
Earthquakes	Section 5.6.2, pages 11-12
Fire Emergencies	Section 5.7, pages 18-19
Medical Emergencies	Section 5.8, page 19
Bloodborne Pathogens	Section 5.9, page 20
Arc Flash Incident – LV/HV Electrical Shock	Section 5.10, pages 20-21
Bomb/Terroristic Threats	Section 5.11, pages 21-22
Active Shooters	Section 5.12, pages 22-23
Spill Response	Section 5.14, pages 24-25
Site Map Orientation Summary Sheet	Section 7.1, Appendix A, page 28
Site Specific Information	Section 7.2, Appendix B, page 29
Site Emergency Contact Sheet	Section 7.3, Appendix C, pages 30-31
Site Visitors Log	Section 7.4, Appendix D, page 32

Q. Drills (16 TAC § 25.53(f))

St. Gall Energy Storage I plans to conduct a drill on the Plan in the first calendar year of commercial operations. St. Gall Energy Storage I will file a supplement in this docket upon completion of the drill.

April 24, 2023

Respectfully Submitted,

Andrew Bowman
President
St. Gall Energy Storage I LLC

Attachment A

Table of Contents

1. Introduction **3**

1.1. Purpose and Applicability *3*

1.2. Approval *3*

1.3. Review and Updates *3*

1.4. Revision Control Summary *4*

1.5. Reporting Requirements *4*

1.6. Annual Drill Requirements *4*

2. Responsibilities **5**

2.1. Site Supervisors or Designees *5*

2.2. Operations and Maintenance Director (O&M Director) *5*

2.3. Site Personnel *5*

2.4. 24/7 Monitoring Service *6*

3. Definitions **7**

4. Communications Plan **8**

5. Plan Annexes **8**

5.1. Emergency Response Equipment Locations *8*

5.2. Pandemic and Epidemic Preparedness Plan *8*

5.3. Critical Site Failure Points *9*

5.4. Notification Requirements *9*

5.5. Site Evacuation *9*

5.6. Severe Weather and Natural Disasters *10*

5.6.1. Equipment Weatherization 10

5.6.2. Earthquakes 11

5.6.3. Flooding 12

5.6.4. Landslides 13

5.6.5. Tornadoes 13

5.6.6. Thunderstorms 14

5.6.7. Extreme Heat 14

5.6.8. Winter Storms and Extreme Cold 15

5.6.9. Hurricanes 17

5.6.10. After Severe Weather and Natural Disasters 17

5.7. Fire Emergencies *18*

5.8. Medical Emergencies 19

5.9. Bloodborne Pathogens 20

5.10. Arc Flash Incident LV/HV Electrical Shock 20

5.11. Bomb/Terroristic Threats 21

5.12. Active Shooters 22

5.13. Cybersecurity 24

5.14. Spill Response 24

5.15. Recovery Priorities 25

5.16. Fuels 26

5.17. Physical Security 26

5.18. Water Shortage 26

6. References **27**

7. Appendices **27**

7.1. Appendix A: Site Map Orientation Summary Sheet 28

7.2. Appendix B: Site Specific Information 29

7.3. Appendix C: Site Emergency Contact Sheet 30

7.3.1. Site Information 30

7.3.2. 24/7 Monitoring Desk Contacts 30

7.3.3. Jupiter Power Contacts 30

7.3.4. QSE Contacts 31

7.3.5. PUCT Contacts 31

7.4. Appendix D: Site Visitors Log 32

7.5. Appendix E: Site Plan Record of Distribution 33

1. Introduction

1.1. Purpose and Applicability

The purpose of this Emergency Action Plan (Plan) is to outline and provide general guidelines for evaluating and responding to known and potential threats or hazards giving rise to an emergency at a Jupiter Power battery energy storage system (BESS) site. In the context of this Plan, emergency response activities are efforts immediately following an emergency. Recovery activities are efforts to restore the system and return to normal operations.

This Plan provides directions and response to any emergency at a Jupiter Power BESS site for all employees and visitors. This Plan provides guidelines for emergencies that include spills, fires, explosions, bomb threats, and personnel injuries. All employees shall be trained in the actions that are to be taken should an emergency occur. Relevant elements of this Plan will be communicated to all visitors during their Site Safety Orientation Training.

Note: All site visitors or contractors shall call the Control Center when arriving and leaving the site. This is critical in the event we have an emergency situation that we have an accurate count who is onsite for notification. Control Center contact information can be found in Appendix C of this document.

1.2. Approval

This Plan was approved by the appropriate executives as of the "Issued" date included in the header of the Plan. This Plan is effective immediately and supersedes all previous editions.

1.3. Review and Updates

The Plan and its annexes shall be reviewed annually by the O&M Director and may be revised based on changes to federal, state, or local regulations and requirements. Additionally, following an annual drill or event of emergency, the O&M Director entity must assess the effectiveness of the emergency response and revise the Plan as needed.

1.4. Revision Control Summary

Revision	Date	Nature of Change	Author	Title
1	4/4/2023	EAP creation	[redacted]	O&M Director

1.5. Reporting Requirements

This Plan will be continuously maintained.

During a calendar year, if a change was made to this Plan that materially affects emergency response, an updated plan must be filed with the Public Utility Commission of Texas no later than March 15 of the following year, along with the other requirements of 16 Texas Administrative Code § 25.53(c)(3)(A).

During a calendar year, if no change was made to this Plan that materially affects emergency response, an attestation stating so must be filed with the Public Utility Commission of Texas no later than March 15 of the following year, along with the other requirements of 16 Texas Administrative Code § 25.53(c)(3)(B).

1.6. Annual Drill Requirements

The battery storage O&M Director or their designee will serve as the Fire Drill Warden for evacuation exercises of the site.

Every BESS facility will annually sponsor an "Emergency Exercise" and invite relevant local first responders to participate.

Annual Emergency Exercises may include "table-top" exercises to review emergency procedures with relevant personnel or "practical" exercises, which occur in the field and simulate emergency events with first responders.

Example scenarios for annual exercises include: severe weather events, medical emergencies, fire emergencies, tower rescues, helicopter service drills, major spill events, arc flash events, and terroristic threats/criminal trespassing.

2. Responsibilities

2.1. Site Supervisors or Designees

Responsible for the overall monitoring, implementation, and enforcement of this Plan.

Responsible for ensuring consistent and effective training of this Plan, as well as documenting distribution and training of the Plan.

Responsible for ensuring all site personnel under their direct supervision are trained on the contents of this Plan.

Responsible for reporting all incidents that occur at their facility.

Responsible for sponsoring an annual drill of this Plan and serving as a liaison with local first responders for Fire, Police, EMS, Helicopter Rescue, and Spill Response.

Responsible for conducting and documenting annual drills.

Responsible for determining appropriate staffing on site during emergency response.

2.2. Operations and Maintenance Director (O&M Director)

Responsible for the technical content of this Plan and its compliance with all Federal and State safety regulations and requirements.

Responsible for assessing the effectiveness of drills and responses to events of emergency and revising this Plan as needed.

Responsible for preparing and issuing all changes to this Plan.

Responsible for performing periodic audits of field locations to determine the level of compliance with this Plan and areas for improvement.

2.3. Site Personnel

All Site Personnel and site visitors will receive training appropriate to the level of their assigned roles through various methods that include an initial orientation, regularly scheduled safety meetings, review of the safety procedures, and formal training programs. All site personnel and visitors are expected to wear safety shoes, safety glasses, and flame resistant clothing. Employees will learn the following:

- Safety and use evacuation procedures.
- Roles and responsibilities during emergencies.
- How to identify conditions that may lead to an emergency.
- The steps to take to prevent emergency situations.
- Their expected response actions during emergencies.
- Reporting of emergency situations, when found.
- How to give all site visitors initial site safety training for all applicable points of this Plan upon arrival to site.
- Site personnel are responsible for assisting with evacuations and search if needed.
- Conduct a clean sweep of all buildings during emergencies if safe.
- Perform searches of the area and check normally unoccupied rooms and spaces.
- Close all doors of rooms that have been searched.
- Stop and contain spills when discovered.
- Use fire extinguishers only if they feel safe doing so.
- Assist outside emergency response personnel, as needed.

2.4. 24/7 Monitoring Service

The Control Center is manned on a 24/7 basis and serves as a 24-hour monitoring and point of contact for all Jupiter Power BESS site emergencies, including those that occur outside of normal operating hours.

The Control Center 24-hour number is written on all Jupiter Power BESS site orientation summaries. Control Center contact numbers are in **Emergency Contact Information**.

During all emergencies the Control Center will serve as the Emergency Control Center (ECC) and will be the base of emergency response activities for the Emergency Response Team.

3. Definitions

AED: Automated External Defibrillator

Bloodborne Pathogens: Means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV) and human immunodeficiency virus (HIV). All human blood and body fluids should be considered as if infectious, and all precautions should be taken to avoid contact.

CPR: Cardiopulmonary Resuscitation

Emergency: Emergency, as that term is used in this Plan, has the definition found in 16 Texas Administrative Code § 25.53(b)(3) and means a situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.

Hazard: Hazard, as that term is used in this Plan, has the definition found in 16 Texas Administrative Code § 25.53(b)(5) and means a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.

OSHA: Occupational Safety and Health Administration

O&M: Operations and Maintenance

PPE: Personal Protective Equipment

Threat: Threat, as that term is used in this Plan, has the definition found in 16 Texas Administrative Code § 25.53(b)(6) and means the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

4. Communications Plan

During an emergency situation, all contact with individuals or agencies external to Jupiter will be the responsibility of the O&M Director or their delegate. This includes communications with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel in Texas; local and state governmental entities, officials, and emergency operations centers; and the applicable reliability coordinator.

Typically, the direct responsibility for external communications will be delegated to the Senior Director, Regulatory, External Affairs & ESG or delegate who will relay information to the media. (No other employee should talk to the media).

Names, addresses, and telephone numbers for media contacts in the surrounding area are maintained and updated by the O&M Director.

Employees who receive a request for information should respond: "We are operating under emergency conditions. May I have your name and a contact number? I will have someone from Jupiter Power contact you. Thank you."

5. Plan Annexes

5.1. Emergency Response Equipment Locations

Large and small Spill Kits (with 55-gallon drum over-pack capability) containing absorbent socks and pads are located outside of the control house in every BESS facility.

Every BESS facility substation control house is equipped with First Aid Kit, SDS Database, fire extinguisher(s), an eyewash station, and a battery spill kit for those with wet cell batteries.

5.2. Pandemic and Epidemic Preparedness Plan

The BESS sites are remotely operated with no full-time on-site employees. All employees can operate effectively remotely under pandemic situations. Remote O&M managers or O&M Director will ensure that third party site operations and maintenance staff are properly staffed to avoid pandemic related delays in scheduled and unscheduled maintenance activities.

5.3. Critical Site Failure Points

[redacted]

5.4. Notification Requirements

Cell phones will be the primary method of notifying others of an emergency. Personnel on duty will supply their cell phone number for contact with the Control Center.

Should an employee discover an emergency situation, it is the employee's responsibility to promptly notify the Site Supervisor, O&M Director, or designee and request help/call 911 or instruct others to evacuate the site.

The call to the O&M Director or designee will include a brief description of the problem, location of the problem, and what assistance is needed. In the case of an evacuation, the instructions should be given concisely and repeated at least once for clear understanding. It is imperative that the employees do not panic but respond quickly and correctly.

5.5. Site Evacuation

[redacted]

[redacted]

5.6. Severe Weather and Natural Disasters

Severe weather and natural disasters can occur at any Jupiter Power BESS site and all personnel should be aware of the constantly changing weather conditions.

Natural disasters include earthquakes, flooding, hurricanes/typhoons, landslides, tornadoes, tsunamis, extreme heat, winter storms and extreme cold, and other natural disaster events.

To prepare for upcoming storm/disaster events, the Site Supervisor, O&M Director, or designee will conduct area inspections listing conditions that must be corrected.

Special attention should be paid to any object that may become a flying debris hazard during high winds. Items stored outdoors shall be secured in place or moved into a conex.

All Jupiter Power BESS sites are unmanned during normal operations with 24/7 remote operations monitoring by the Control Center. The 24/7 service provider will have both primary and backup manned sites and the contact information for both primary and backup facilities is located in Site Emergency Contact Sheet.

5.6.1. Equipment Weatherization

All Jupiter Power BESS facilities are weatherized consistent with manufacturer requirements and recommendations.

Best efforts should be used to implement weather emergency preparation measures intended to ensure the sustained operation of cold weather critical components of all Jupiter Power BESS sites during winter weather conditions.

The O&M Director or designee will conduct maintenance of freeze protection components for all applicable equipment, the failure of which could cause an outage or derate.

The O&M Director or designee will test freeze protection components on a monthly basis from November through March.

5.6.2. Earthquakes

During an earthquake if indoors:

- Take cover under a sturdy desk, table, or bench or against an inside wall, and hold on. If there is not a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building.
- Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
- Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported, loadbearing doorway.
- Stay inside until the shaking stops and it is safe to go outside. Most injuries during earthquakes occur when people are hit by falling objects when entering into or exiting from buildings.

During an earthquake if outdoors:

- Stay there.
- Move away from buildings, streetlights, and utility wires.

During an earthquake if trapped under debris:

- Do not light a match.
- Do not move about or kick up dust.
- Cover your mouth with a handkerchief or clothing.

- Tap on a pipe or wall so rescuers can locate you. Use a whistle if one is available. Shout only as a last resort—shouting can cause you to inhale dangerous amounts of dust.

After an earthquake:

- Be prepared for aftershocks.
- Be aware of possible tsunamis in coastal areas. When local authorities issue a tsunami warning, assume that a series of dangerous waves is on the way. Stay away from the beach.

5.6.3. Flooding

During a flood:

- Listen to the radio, television or other media platform to monitor the situation for weather reports and emergency information.
- Be aware that flash flooding can occur. If there is any possibility of a flash flood, move immediately to higher ground. Do not wait for instructions to move.
- Be aware of streams, drainage channels, canyons, and other areas known to flood suddenly. Flash floods can occur in these areas with or without such typical warnings as rain clouds or heavy rain.

If you must evacuate or prepare to evacuate:

- If possible in a safe manner, secure your office; turn off utilities at the main switches or valves if instructed to do so. Disconnect electrical appliances. Do not touch electrical equipment if you are wet or standing in water.
- Do not walk-through moving water. Six inches of moving water can make you fall. If you have to walk in water, walk where the water is not moving. Use a stick to check the firmness of the ground in front of you.
- Do not drive into flooded areas. If floodwaters rise around your car, abandon the car and move to higher ground if you can do so safely. You and the vehicle can be quickly swept away.

5.6.4. Landslides

During a landslide:

- Move away from the path of a landslide or debris flow as quickly as possible.
- Curl into a tight ball and protect your head if escape is not possible.

After a landslide:

- Stay away from the slide area. There may be danger of additional slides.
- Watch for associated dangers such as broken electrical, water, gas, and sewage lines and damaged roadways and railways.

5.6.5. Tornadoes

Listen to the radio, television, or other media platform to monitor the situation for weather reports and emergency information

If you are under a tornado warning, seek shelter immediately!

If you are in a structure (e.g., small building, high-rise building):

- Go to a pre-designated shelter area such as a safe room, basement, storm cellar, control room, or the lowest building level.
- If there is no basement, go to the center of an interior room on the lowest level (closet, interior hallway) away from corners, windows, doors, and outside walls. Put as many walls as possible between you and the outside.
- Get under a sturdy table and use your arms to protect your head and neck.
- Do not open windows.

If you are in a vehicle:

- Get out immediately.

- Go to the lowest floor of a sturdy, nearby building or a storm shelter.

If you are outside with no shelter:

- Lie flat in a nearby ditch or depression and cover your head with your hands. Be aware of the potential for flooding.
- Do not get under an overpass or bridge. You are safer in a low, flat location.
- Never try to outrun a tornado in urban or congested areas in a car or truck. Instead, leave the vehicle immediately for safe shelter.
- Watch out for flying debris. Flying debris from tornadoes causes most fatalities and injuries.

5.6.6. Thunderstorms

When thunderstorm/lightning activity is in the weather forecast, if there are personnel on site doing work, personnel must monitor the weather conditions and weather radar for the location of thunderstorms.

From 30 miles away from where the work is being done, personnel should be notified of the lightning in the area and prepare to stop work and seek shelter.

From less than 6 miles away the personnel should stop work and seek shelter until the all clear notice is given. All clear is typically lightning being 30 miles away for 30 minutes or longer.

5.6.7. Extreme Heat

Stay indoors as much as possible and limit exposure to the sun.

Stay on the lowest floor out of the sunshine if air conditioning is not available.

Consider spending the warmest part of the day in air-conditioned facilities or your vehicle.

Eat well-balanced, light, and regular meals. Avoid using salt tablets unless directed to do so by a physician.

Drink plenty of water and limit intake of alcoholic beverages after working hours.

Dress in loose-fitting, lightweight, and light-colored clothes that cover as much skin as possible.

Protect face and head by wearing a wide-brimmed hat and wearing sunblock with SPF 50 or higher.

Avoid strenuous work during the warmest part of the day. Use a buddy system when working in extreme heat and take frequent breaks.

5.6.8. Winter Storms and Extreme Cold

During a winter storm:

- Listen to the radio, television, or other media platform to monitor the situation for weather reports and emergency information.
- Eat regularly and drink ample fluids.
- Avoid overexertion when shoveling snow.
    - Overexertion can bring on a heart attack.
    - If you must shovel snow, stretch before going outside.
- Watch for signs of frostbite.
    - Signs include loss of feeling and white or pale appearance in extremities such as fingers, toes, ear lobes, and the tip of the nose.
    - If symptoms are detected, get medical help immediately.
- Watch for signs of hypothermia.
    - Signs include uncontrollable shivering, memory loss, disorientation, incoherence, slurred speech, drowsiness, and apparent exhaustion.

- If symptoms of hypothermia are detected, get the victim to a warm location, remove wet clothing, warm the center of the body first, and give warm, non-alcoholic beverages if the victim is conscious.
- Get medical help as soon as possible.

- Conserve fuel, if necessary, by keeping your building cooler than normal. Temporarily close off heat to some rooms.
- Maintain ventilation when using kerosene heaters to avoid build-up of toxic fumes. Refuel kerosene heaters outside and keep them at least three feet from flammable objects.
- Drive only if it is absolutely necessary. If you must drive, consider the following:
  - Travel in the day, don't travel alone, and keep others informed of your schedule.
  - Stay on main roads; avoid back road shortcuts.

If a blizzard traps you in a car:

- Pull off the highway. Turn on hazard lights and hang a distress flag from the radio antenna or window.
- Remain in your vehicle where rescuers are most likely to find you.
  - Do not set out on foot unless you can see a building close by where you know you can take shelter.
  - Be careful; distances are distorted by blowing snow. A building may seem close, but be too far to walk to in deep snow.
- Run the engine and heater about 10 minutes each hour to keep warm. Ensure fuel tanks are at the halfway mark or above if inclement weather is forecasted.
  - When the engine is running, open an upwind window slightly for ventilation to prevent possible carbon monoxide poisoning.

- Periodically clear snow from the exhaust pipe.

- Exercise can help maintain body heat, but avoid overexertion. In extreme cold, use road maps, seat covers, and floor mats for insulation. Huddle with passengers and use your coat for a blanket.

- Take turns sleeping. One person should be awake at all times to look for rescue crews.

- Drink fluids to avoid dehydration. All vehicles shall have an emergency kit – bottles, a 5 lb fire extinguisher, first aid kit, bloodborne pathogen kit, snake bit kit, and a headlamp or flashlight.

- Vehicles must have a safety kit and an AED.

- Be careful not to waste battery power. Balance electrical energy needs—the use of lights, heat, and radio—with supply.

- Turn on the inside light at night so work crews or rescuers can see you.

- If stranded in a remote area, stomp large block letters in an open area spelling out HELP or SOS and line with rocks or tree limbs to attract the attention of rescue personnel who may be surveying the area by airplane.

- Leave the car and proceed on foot—if necessary—once the blizzard passes.

5.6.9. Hurricanes

This Jupiter Power BESS site is not located in a TDEM hurricane evacuation zone and does not require a hurricane preparedness plan.

5.6.10. After Severe Weather and Natural Disasters

- Watch out for broken glass, debris, and fallen power lines.

- Do not enter damaged areas until you are told it is safe.

- Do not use an open flame or light cigarettes; combustibles may be present.

- Be cautious when entering damaged structures.

5.7. Fire Emergencies

[redacted]

[redacted]

5.8. Medical Emergencies

If an accident involving someone on site occurs which results in a medical emergency, your immediate actions should include the following:

- Stop the accident/machine or cause of the accident if possible.
- Call 911 or request another to call 911. Call 911 if it is a life threatening injury, head injury, spinal injury, amputations, significant mechanism of injury, blunt trauma force, fall from 20' or more, or penetration into body cavity or organs. Do not drive the injured victim to the hospital. Wait for EMS or airlift. When calling, provide:
    - Your name and phone number
    - Name of injured person
    - Nature of injury
    - Location of the injured person
- Provide lifesaving first aid; all field personnel should be CPR, First Aid, and AED certified.

For non-life threatening injury:

- Provide first aid to the injured and determine whether first-responder personnel should be called; and
- Inform the O&M Director or designee.

5.9. Bloodborne Pathogens

As defined above, Bloodborne Pathogens are microorganisms that are present in human blood and can cause disease in humans and therefore must be protected against.

Every BESS site Conex storage container is equipped with a Bloodbome Pathogen Kit, which contains at a minimum: towels, biohazard bag with tie, surface cleaner for sterilization, and gloves.

All employees shall exercise universal precautions through the use of appropriate PPE (consider ALL untested human blood and body fluids are infectious) when handling blood or Other Potentially Infectious Material (OPIM) and any objects which could be contaminated with blood or OPIM.

If an employee has a contact with contaminated material to a part of his/her body not protected by PPE, the affected skin shall be immediately washed and flushed thoroughly with soap and water. Notify the O&M Director or designee.

Employees are required to wash and flush their hands with soap and water upon removal of protective gloves. Gloves are to be removed using the "inside-out method" by pulling the cuff of the glove over the remainder of the glove resulting in the contaminated part of the glove being on the inside.

Upon completion of the cleanup job, all PPE shall be cleaned, decontaminated, and sterilized if necessary before being properly stored. All disposable PPE as well as the cleaning materials shall be securely packaged and prominently labeled as Regulated Waste.

Contaminated materials labeled as Regulated Waste cannot be disposed of in plant trash. Contact a member of the O&M team to coordinate proper disposal of this waste.

5.10. Arc Flash Incident – LV/HV Electrical Shock

Arc Flash Incidents and High Voltage (defined as greater than 600 volts) Shock can result in internal burns of deep tissue, which may appear normal at the surface of the skin. It is critical that victims be evaluated at the nearest Burn Center. Low Voltage Electrical Shock (greater than 50 volts and less than 600 volts) can be just as deadly and harmful. Any electrical contact should be evaluated by a medical professional.

When working on or around live circuits, be sure to wear the right PPE to protect against electric shock and arc flash and follow all applicable safety protocols/manuals.

Never wear clothing made from synthetic materials, such as acetate, nylon, polyester, or rayon - alone or combined with cotton. Such clothing is dangerous because it can burn and melt into your skin.

The minimum PPE required would be an untreated natural fiber long-sleeve shirt and long pants with safety glasses with side shields (hazard/risk category 0). Observe Arc Flash labeling for the correct Hazard/Risk Category.

All jewelry shall be removed prior to working on or around live circuits. Metal conducts electricity, and an electrical charge through a ring or metal watch band can be extremely hazardous. Severe burns can result. Safety glasses shall be non-conductive.

If an injured employee is in contact with an energized circuit: **do not touch the victim, shut off the power, and call 911!** If you cannot de-energize the circuit, dislodge the victim from the circuit with non-conductive material, i.e., insulated shepherd's hook. If the victim is on fire, smother or douse the flames. Remove smoldering clothing, but not clothing that is melted to the skin.

Tell a conscious victim not to move. There may be other associated injuries besides the burns, such as a neck or spine injury. Moving an injured person can make injuries worse.

Check for respiration and pulse. If the victim is not breathing, rescue breathing from trained personnel should begin immediately. If a pulse is absent, the victim needs CPR. To be effective, CPR should begin in less than 4 minutes. CPR is 30 compressions for every two breaths.

Run cool, not cold, water over the burn. Do not apply creams, ointments, or ice. After the burn has been cooled, cover it with a clean dry cloth. Keep the victim warm. Do not give the victim any food or water.

Always see a doctor following an electrical shock or burn. Even a victim who feels OK may have suffered internal injuries that may not become apparent until later.

5.11. Bomb/Terroristic Threats

[redacted]

[redacted]

5.12. Active Shooters

In the event of an active shooter entering any Jupiter Power BESS site, know evacuation routes and be familiar with your surroundings.

Remember to RUN, HIDE, FIGHT.

- RUN: If you are in a public/open space (lobby) and exiting the building is an immediate and safe option:
    - Exit the building.
    - Notify anyone you might encounter to exit the building.
    - Call 911.

- HIDE: If evacuating the building is not an option, shelter-in-place:
    - Find an area where the active shooter is less likely to find you.
    - Stay away from windows, glass doors, glass partitions, and any other structures made of glass.
    - If you are in a room, stay there and secure the door.
    - If you are in a hallway, get into a room and secure the door.
    - Stay out of the active shooter's view.
    - Provide protection if shots are fired in your direction with closed doors and heavy furniture.
    - Blockade doors with heavy furniture.
    - Keep quiet.
    - Silence your cell phone(s).
    - Stay on the floor and away from windows and doors.
    - Do not peek out to see what is happening.
    - Call 911.
- FIGHT: As a last resort, consider taking out the shooter if they enter your area:
    - Act aggressively towards the shooter.
    - Throw items and makeshift weapons.
    - Yell.
    - Commit to your actions.
    - Reminder: This is a decision only you can make if you are comfortable doing so.

5.13. Cybersecurity

[redacted]

5.14. Spill Response

Every BESS site has a site-specific Spill Prevention Control & Countermeasures Plan (SPCC) that has been certified by a Professional Engineer (PE).

The SPCC includes a facility description detailing the location, activities, storage quantities and discharge potential for all petroleum products used or stored on site.

Spill Containment is the primary means of Spill Control. All containers of 55-gallons or greater must be stored within a secondary containment structure. This can be accomplished through the use of containment pallets for 55-gallon drum storage.

All secondary containment structures must be inspected on a monthly basis with inspection records available for review.

All secondary containment structures which are exposed to the elements must be drained after each storm event to fully restore their containment capabilities. This includes the Main Power Transformer sump.

All personnel are tasked with stopping spills and containing spills. Prior to engaging in activities to contain the spill, personnel must obtain and wear appropriate personal protective equipment. If a spill kit is not immediately available build an earthen berm to contain the spill. It is a priority to ensure all spills on site are contained and prevented from reaching the nearest body of water. Once contained, the spill area should be secured to prevent unintended exposure to others.

Spill cleanup and remediation will typically be contracted through a spill response vendor. Small spills may be addressed by site personnel.

All spill response materials used during cleanup activities, as well as any contaminated absorbent or soil must be properly disposed of through the site oily waste recycling vendor (e.g., Safety Kleen).

All spills will be immediately reported to the O&M Director or designee. O&M Director will then inform the Chief Technology Officer who will determine if there are any external regulatory reporting requirements.

5.15. Recovery Priorities

[redacted]

5.16. Fuels

Fuels required to operate O&M equipment will be stored in the appropriate hazardous materials safety locker.

5.17. Physical Security

[redacted]

5.18. Water Shortage

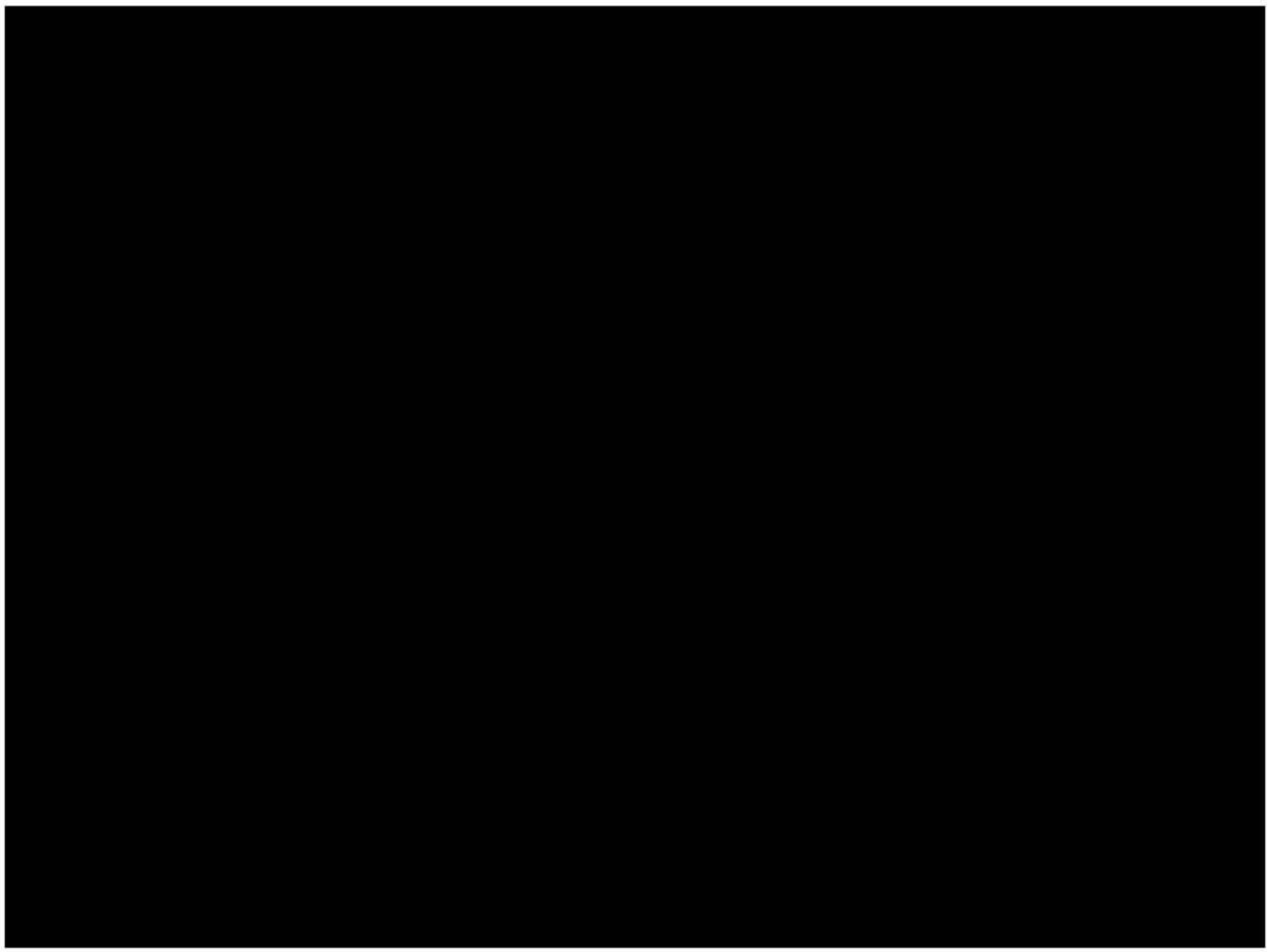
No Jupiter Power BESS relies on or requires water to operate.

6. References

- FEMA Are You Ready? An In-Depth Guide to Citizen Preparedness
  - http://www.fema.gov/pdf/areyouready/areyouready_full.pdf
- OSHA 1910.38 Employee Emergency Action Plans
- U.S. Department of Homeland Security Active Shooter: How to Respond
  - http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf

7. Appendices

7.1. Appendix A: Site Map Orientation Summary Sheet



7.2. Appendix B: Site Specific Information

Project	Latitude	Longitude	Description	911 Address	Interconnection
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

[redacted]

7.3. Appendix C: Site Emergency Contact Sheet

7.3.1. Site Information

Project Name:	St. Gall Energy Storage I LLC
911 Address:	[redacted]
Pecos County Emergency Services District Address:	[redacted]

7.3.2. 24/7 Monitoring Desk Contacts

Jupiter Power will supplement this contact information section at a later date.

7.3.3. Jupiter Power Contacts

Primary Site Contact: [redacted]

- Email: [redacted]
- Tel: [redacted]

Backup Site Contact: [redacted]

- Email: [redacted]
- Tel: [redacted]

Primary Communications Contact: [redacted]

- Email: [redacted]
- Tel: [redacted]

7.3.4. QSE Contacts

Jupiter Power will supplement this contact information section at a later date.

7.3.5. PUCT Contacts

[redacted]

- Email: [redacted]
- Tel: [redacted]

[redacted]

- Email: [redacted]
- Tel: [redacted]

7.4. Appendix D: Site Visitors Log

Project: St. Gall Energy Storage I LLC			
Name	**Date**	**Signature**	**Safety Orientation Complete?**

7.5. Appendix E: Site Plan Record of Distribution

Project: St. Gall Energy Storage I LLC			
Name	**Title**	**Date of Access**	**Date of Training**
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023
[redacted]	[redacted]	4/19/2023	4/24/2023

Attachment B

AFFIDAVIT

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

BEFORE ME, the undersigned authority, on this day personally appeared Andrew Bowman who swore an oath that the following facts are true:

1. My name is Andrew Bowman. I am the President of Jupiter Power LLC and the highest-ranking officer with binding authority over St. Gall Energy Storage I LLC ("St. Gall Energy Storage I"). I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of St. Gall Energy Storage I. I have personal knowledge of the matters described herein.

2. St. Gall Energy Storage I developed an emergency operations plan (the "Plan") in accordance with 16 Texas Administrative Code ("TAC") § 25.53.

3. Concurrent with the filing of its Plan, St. Gall Energy Storage I filed its application for registration with the Public Utility Commission of Texas as a power generation company. The St. Gall Energy Storage I facility is a battery energy storage system.

4. Before commercial operations commence, all relevant operating personnel will have access to and will receive training on the Plan, and such personnel will be instructed to follow the Plan except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

5. The Plan has been reviewed and approved by the appropriate executives.

6. Per 16 TAC § 25.53(f), St. Gall Energy Storage I plans to conduct a drill in the first calendar year of commercial operations and will file a supplement in this docket upon completion of the drill.

7. The Plan or an appropriate summary has been distributed to local jurisdictions as needed.

8. St. Gall Energy Storage I maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

9. The St. Gall Energy Storage I 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.

FURTHER AFFIANT SAYETH NOT.

Andrew Bowman
President
St. Gall Energy Storage I LLC

Sworn to and subscribed before me this 24th day of April 2023.

Notary Public, State of Texas
My Commission Expires: