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Safety First

Buffalo Gap Emergency Response and Communication Plan (ERCP)

(Formerly "Emergency Action Plan (EAP)"

Buffalo Gap Windfarm
10718 FM 89
Merkel TX 79536

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Emergency Response and Communication Plan (ERCP)

The purpose of the Buffalo Gap Emergency Response and Communication Plan (ERCP) is to assist employees and management in making quality decisions during times of crisis. The (ERCP) contains guidance in determining appropriate actions to take to prevent injury and property loss from the occurrence of emergency incidents. The (ERCP) will also assist facility management in ensuring the survivability of the various business assets at AES Buffalo Gap Wind Generation, in the event of an incident.

The (ERCP) will meet the applicable requirements of federal regulations, including 29 CFR 1910.38(a), as well as state and local regulations regarding emergency action planning. When an emergency occurs at the facility during normal operating hours, the safety of employees and visitors will be coordinated by the Buffalo Gap EHS Specialist, Safety Champion, or Team Leaders.

Scope

This standard applies to all AES business, contractors, and sub-contractors performing work at the Buffalo Gap facility.

Definitions

AES Person – Any person directly employed by AES Corporation

AES Contract Person - Any person contracted to work on behalf of an AES Business and directly supervised by an AES Person.

AES Integrated Energy (AIE)- transmission planner for Buffalo Gap, Qualified Scheduling Entity (QSE)

Emergency – An emergency is a situation that causes or has potential to cause injury to workers, customers, or the public; property damage; business disruption; or environmental impacts. All emergencies require well developed response plans and prompt actions according to those plans to protect the health, safety, or welfare of people, and limit property damage, environmental impacts and/or business disruption. For this AES Standard, emergencies will be classified into three primary categories: natural emergencies (weather, climate, seismic, wildfires, pandemics, etc.), man-made on-site/operational emergencies (explosion, chemical release, fire, etc.) and man-made off-site emergencies (train derailment, chemical release from neighboring industries, threats of terrorism, etc.).

Emergency Action Plan (EAP) – See Emergency Operations Plan (EOP)

Emergency Management Director ("EMD") - The EMD is in command and control of the Emergency Operations Center (EOC) and the Team. EMD will direct and coordinate the utilization of Buffalo Gap's resources and provide and interface with Nolan County, Taylor County, and surrounding emergency services, if it is activated. EMD will coordinate with the Incident Commander to ensure the safest and most expedient mitigation for the incident. EMD or designee will keep the Regional Manager, and other senior AES management informed as to the status of the emergency if requested. EMD will supervise distribution of emergency information for Buffalo Gap through Team Leaders. EMD with the help of Team Leaders will coordinate and implement the BCP to restore normal operations.

Emergency Management Team - The team oversees the incident operations and supports Incident Commander ("IC"), person on-site who oversees the response to emergency, by providing resources and recommending financial assistance, as needed. The team will:

- Determine short-term and long-term effects of the emergency
- In consultation with the Incident Commander, order an evacuation or shutdown of the plant
- Mobilize resources, as needed
- Develop and implement a plan for the orderly return to normal operations (BCP) Business Contingency Plan
- Interface with outside organizations and media
- Communicate situation reports to employees

Emergency Operations Plan (EOP) – A written detailed program of actions and communications protocols to manage emergency situations, minimize their effects, and restore the facility to full operation. The EOP contains action and reporting requirements contained in PUCT 25.53 Substantive Rules Applicable to Electric Service Providers. Formerly referred to as the Emergency Action Plan (EAP).

Emergency Response and Communication Plan (ERCP) - A written detailed program of actions and communications protocols to minimize and mitigate the effects of an emergency. Contains the site EOP.

ERCOT- Electric Reliability Council of Texas

Everbridge – An emergency notification system utilized by AES. Notifications are sent from ISOC, the ROCC, or a local Everbridge Administrator in the event of an emergency via email, text and/or phone call.

General Manger (GM) – The person ultimately responsible for the content, review, distribution, and implementation of the processes contained in the ERCP and EOP. May be Regional Manager or designee. See the General Manager Affidavit for further definition detail.

Hazard - A situation with a potential for human injury, damage to property, damage to the environment, or some combination of these.

Incident Commander ("IC") - The IC is the person at the site of the emergency who oversees the immediate emergency response. This will vary depending on the nature of the incident. The IC must have the capability and expertise to assume command of an emergency as described in this procedure. The IC will manage on-scene operations of an emergency response. The IC is responsible for the technical aspects of the response as well as the tactical planning, security, execution, and determining the need for outside assistance and resources, and interface with the EOC. During an incident, the IC will:

- Maintain regular communication with EMD.
- Utilize Buffalo Gap personnel to set-up security points to keep unauthorized people away for the emergency and allow entry to emergency response equipment and personnel.
- Assume command, notify the EMD, implement the emergency procedures specified for the incident, assess the situation, implement this plan, activate resources, order and initiate evacuation of persons in harm's way, and upon conclusion of the incident, declare the emergency in over. If emergency services local, state or federal agencies are on the scene the IC will act as the liaison with these departments.

Indji – Indji Watch is a weather monitoring system that remotely monitors weather activity and sends warnings for events such as icing, lightning, and extreme heat via email and text message. System notifications are managed locally by EHS and Team Leaders.

Intelligence Security Operations Center (ISOC) – This team within the IS shared service is responsible for the monitoring of physical and cyber controls implemented throughout AES US operations. Members of this team are also responsible for threat identification and analysis for AES Facilities in the US.

NERC – National Electric Reliability Council

PUC/PUCT – Public Utilities Commission (of Texas)

Responders - Persons identified in the ERCP as being responsible for actions that are intended to minimize the risk, loss, and damage resulting from the emergency. These persons can represent external resources (e.g., ambulance, fire, police, contractors, or neighboring industries with capabilities) or be the workers or management of AES Businesses.

ROCC – Remote Operations Control Center

Objective

To provide employees with procedures to follow for effective and safe response to emergency situations, and to aid in the prevention of and planning for emergencies at the Buffalo Gap (BG) facility.

Annual Review - *PUCT 25.53c(4)(A)(i)(ii)*

This ERCP contains the Buffalo Gap EOP and will be reviewed annually by site leadership and documented in Site Docs. Site personnel will receive at minimum annual training for the policies and procedures contained in this document, including initial training, and periodic training when need arises. The roster for this training will be documented on the Safety Meeting/Training/Drill form in Site Docs>Forms>Safety. See annex A.

Emergency Identification and Risk Assessment
The Buffalo Gap Emergency Identification and Risk Assessment/Impact Analysis may be viewed at: SiteDocs2020>Resources>Emergency Response and Communication Plan (ERCP>BG Emergency Identification and Risk Assessment
It is also posted on the bulletin boards in the O&M entry way, and the tech rooms.

Roles and Responsibilities
An emergency management Team has been established to assume the responsibility for addressing emergencies at Buffalo Gap. The team is headed by the General Manager and is comprised of the following members:

1) Emergency Management Director ("EMD")

- General Manager

If the General Manager is not available, the EMD responsibilities will be assumed by a Team Leader

2) Team Leaders
- BG-1
- BG-2
- BG-3
- Balance of Plant (BOP)
- Environmental Health and Safety (EHS)

3) Incident Commander (IC)
- Assigned by EHS or EMD if necessary

The designated IC for Buffalo Gap are:
o   EHS Coordinator
o   Safety Champion
o   Team Leaders
o   Site Technician until relieved by one of the above

Responsibilities for each role vary based on the emergency response situation and are outlined case-by-case in the EOP section of this document.

Any emergency requiring communication with the media, PUC, local or state government, emergency operations center (e.g., American Red Cross), fuel suppliers, ROCC, or DE, will be performed by the GM or designee as appropriate.

Resources

The Buffalo Gap facility is a two/story metal framed building. The downstairs kitchen area serves as the building's tornado shelter. The 2010 remodeled version has a combined three meeting areas, two women's restrooms, four men's restrooms, two kitchen areas and 17 offices.

The facility is protected by a fire protection system, including smoke detectors, fire extinguishers, located in various places around the building, and a fire monitoring provided by ISOC and ROCC.
The facility includes a code-controlled electronic gate. Gates may not be left standing open when there is no one at the O&M building. It will change periodically.

The facility has three substations: Buffalo Gap 1 (Vestas) and Buffalo Gap 3 (Siemens) substations located south of the O&M building on FM 89. Buffalo Gap 2 (GE) Cirello substation is located about 10 miles west of the O&M building.

(911) AES Facility Locations

Buffalo Gap O&M
10718 FM 89
Merkel TX 79536

Nolan Yard/Warehouse
1811 CR 258
Nolan TX 79537

BG1 Substation Isolation Points	BG2 Substation Isolation Points	BG3 Substation Isolation Points
CS 52-F1 Feeder 1	CS 52-1 Feeder 1	CS 52-5 Feeder 5
CS 52-F2 Feeder 2	CS 52-2 Feeder 2	CS 52-6 Feeder 6
CS 52-F3 Feeder 3	CS 52-3 Feeder 3	CS 52-7 Feeder 7
CS 52-F4 Feeder 4	CS 52-4 Feeder 4	CS 52-8 Feeder 8
152-1 138KV Circuit Breaker AEP 3610	CS 52-5 Feeder 5	152-3 138KV Circuit Breaker AEP 5405
152-2 138KV Circuit Breaker AEP 4880	CS 52-6 Feeder 6	
	CS 52-7 Feeder 7	
	CS 52-8 Feeder 8	
	152-1 138KV Circuit Switch AEP-2640	
	152-2 138KV Circuit Switch AEP-3355	

Emergency Communication

During an emergency, Buffalo Gap Team Leaders and/or EHS Specialist will have the responsibility for ensuring that proper actions are taken to ensure the safety of employees and visitors to the facility. Management grants them the authority to carry out those tasks and functions identified in the plan that provides for the safety of personnel.

Communication during emergency events may take place using cell phones, radios, satellite phone, or other methods approved by the GM. Mass notification software systems, such as Everbridge, or weather alert software such as Indji, may be utilized to communicate hazards or emergency situations to all technicians. As such, all workers must always have access to a communication device while on site.

Emergency Contact List- *PUCT 25.53c(4)(B)*

Name	Title	Mobile Telephone Number	E-mail
Brett Hastings	US Director Field Ops	585-748-3333	brett.hastings@aes.com
Tracy Jarvis	Snr Mgr Plant Operations	325-725-6180	tracy.jarvis@aes.com
Vince Lesko	Wind O&M Manager	760-660-6412	Vince.lesko@aes.com
Dave Barnett	BG1 Team Leader	325-721-3509	david.barnett@aes.com
Lolly Bradbury	BG2 Team Leader	325-627-5939	lolly.bradbury@aes.com
Justin Calcote	BG3 Team Leader	325-977-0620	justin.calcote@aes.com
Jeremy Kingston	EHS Coordinator	325-219-2832	jeremy.kingston@aes.com
Jeff Ludlum	High Voltage/BOP	325-266-3029	jeffery.ludlum@aes.com
ISOC	ISOC Physical Security	800-270-4762	AESISOCCommunication@aes.com
Cyber Security	AES Cyber Security	317-261-8010	aesussbucybersecurity@aes.com

Medical Facilities

Hendrick Medical Center	1900 Pine St, Abilene TX 79601	325-670-2000
Abilene Regional Medical Center	6250 US-83, Abilene TX 79606	325-428-1000
Rolling Plains Memorial Hospital	200 E Arizona Ave, Sweetwater TX 79556	325-235-1701
Affordacare	3101 S 27th, Abilene TX 79605	325-695-5440
Air Evac – Abilene Base	1900 Pine St, Abilene TX 79601	325-670-3200 1-800-247-3822 (emergencies)

Abilene Police Department	325-673-8331
ECCA Fire Department	325-572-3980
FBI - Abilene (Local Office)	325-677-6191
FBI - Dallas (Area Office)	972-559-5000
Mulberry Fire Department	325-846-4567
Nolan Fire Department	325-798-4567
Nolan Sheriff	325-235-5471
OSHA - Ft. Worth Office	817-428-2470
Poison Control	800-222-1222
Safety Kleen	888-375-5336
Sweetwater Fire and Ambulance	325-236-6828
Care Flight	800-247-3822
Taylor County Sheriff	325-674-1300
TX Commission of Environmental Quality (TCEQ)	325-698-9674
TX Dept. of Transportation - Road Conditions	325-676-6855
TX Emergency Spill Reporting	800-832-8224
TX Worker's Comp. Commission	325-695-4942
US Environmental Protection Agency	800-887-6063

First Aid Responders and Facilities

All BG site personnel are required to be trained and certified in the practice of first aid and cardiopulmonary resuscitation (CPR). AES workers in the field, including contractors and sub-contractors must be within 3-4 minutes of someone trained in first aid and CPR. This includes but is not limited to up-tower turbine work, down-tower turbine work, substation work, construction work, and transmission/power line work.

First aid kits and automatic external defibrillators (AED) are located on each floor of the office building, in each warehouse, in each substation control house, and in each company vehicle. They are inspected/inventoried at least quarterly and resupplied and/or recertified as needed.

All personnel involved with work at heights must be trained in fall arrest, rescue, and evacuation. Contractors and sub-contractors must present certificates of such training before beginning work onsite. Appropriate rescue equipment must be maintained and be present on each job site.

Implementation/Drills

Drills or other tests of the ERCP/EOP must take place at least annually and be documented. Drills must be specific, and the results of the exercises must be documented. Areas of improvement must be identified with a post-exercise review conducted by management, EHS, and/or the Safety Committee, and improvements or corrections must be documented in a format such as a management of change report, or meeting minutes that list the problem areas identified and the corrections made. All documentation will be stored on SiteDocs2020>Resources. All deficiencies must be given urgent (high) priority and corrected immediately.

Communication systems (cell phones, radios, sat phones, computer messaging systems) must be tested at least every three months and documented. Satellite phones tests are documented by ISOC. All others are documented locally, and available from the EHS department.

Review/Auditing

The ERCP/EOP will be reviewed and revised annually or when changes are introduced to the plant or processes and will be audited in accordance with the AES Internal Audit Schedule. See record of revisions in annex (A).

Emergency Reporting

Emergencies must be reported in compliance with AES Global Standards:
AES-STD-OHS12 Incident Management 4.2.1.6

SIP and Non-SIP Incidents (excluding LTI and Fatality) and Workplace Hazards: An Intelex Incident Report is sufficient information sent to Regional/ Global Leadership.

LTI and Fatality (AES, Contractor or Public): As soon as you become aware of an LTI or Fatality, following chain to communication should be followed. Phone and/or email shall be used to ensure fast and quick communication: Supervisor or Designee>Business Leader, Business Safety manager>SBU-EHS Director/Leader>Managing Director EHS & Security>SBU President, SBU COO, VP of Global Operations, AES SVP & COO
- If the injury requires hospitalization of the injured person for treatment beyond the day of the incident, the business must also:
  - o Contact and notify International SOS (ISOS) requesting support for medical monitoring of the injured personnel.
  - o Engage ISOS by calling one of the following ISOS Assistance centers:
    - 1. Philadelphia, US: +1-215-942-8226
    - 2. London, England: +44-20-8762-8008
    - 3. Singapore: +65-6338-7800
  - o The caller will be asked to provide at a minimum:
    - AES ISOS Membership Number: 11-BCPA-000-152
    - Their Name
    - Contact information

- Name of Injured Person
- AES Location of injured person
- Medical status of injured person
- Name, address and phone number of the medical facility the injured person was taken to
- ISOS will contact medical facility, Injured Person (IP)'s family to attempt to obtain necessary permission to provide care guidance and update non-medical reports.
- ISOS will coordinate with AES to provide appropriate services.
- ISOS will send non-medical condition updates to AES Authorized People.
- ISOS will close the file (end their assistance) after the IP is discharged from the medical facility or if AES elects to end their monitoring service

Intelex Reporting

The Team Leader or designee for the site on which the incident occurred is expected to create an initial incident report in Site Docs using the appropriate Incident Report and containing only factual information with no speculation, according to the below timeframe.

- o **AES reportable Non-SIP Incidents (three working days)**
  - Near-miss, first aid, recordable (excluding LTI)
- o **AES reportable SIP Incidents, excluding Fatality (two working days)**
  - Near-miss, First Aid, Recordable, LTI (SIP and Non-SIP)
  - SIP Unsafe Condition or SIP Unsafe Behavior
- o **Fatality (one working day)**
  - AES persons
  - Contractor
  - Public
- o **Non-AES reportable, excluding Fatality (five working days)**

The Team Leader or designee for the site on which an incident occurs must also begin an incident report in Intelex, with the Investigation assigned to the EHS Specialist on site.

Reports to external agencies, such as OSHA, will be made by the EHS coordinator or designee in conjunction with the GM.

Emergency Operations Center (EOC)

The EOC may be established by the EMD or IC at a location appropriate to the emergency or nature thereof which will allow key personnel to carry out the functions of:

- Making key decisions
- Provide technical information required for the emergency
- Establish two-way communications for the emergency
- Approve and procure resources
- Manage operations
- Liaise with authorities and external organizations
- Assess damage and develop long-range plans
- Gather information and Keep records
- Ensure information is provided to the public and affected employees in a timely manner

Such locations may include but are not limited to: O&M building conference room, team leader office(s), BG laydown yard, SCADA control room, substation control house, or other remote or field locations as dictated by necessity and approved of by the GM or designee.

Incident Command Center (ICC)/Field Command Post (FCP)

In the event of an Incident, and Incident Command Center or Field Command Post must be established by the Incident Commander in a safe location near the emergency site that allows for the coordination and direction of all response and mitigation efforts at the emergency site and enables responders to carry out the objectives set by the EOC. It may also be combined with the EOC at one location. The ERCP shall be made available in an accessible format at the ICC/FCP

Security

The area around an emergency or incident site will be secured using but not limited to the following means: assigned personnel, flagging, tape, barriers, temporary fencing, signs, ropes, cones or other administrative controls. Personnel assigned to security should be in constant communication with the ICC or FCP. Duties will include but are not limited to reducing the potential for physical asset loss, managing traffic and external resources access to the scene, and helping restore normal operations. Security personnel will be approved and assigned by the GM, EMD, or designee. If armed security is required, such services will be hired out externally.

Training

AES employees will be trained on the ERCP upon hire and receive refresher training at least annually. Contractors and sub-contractors will be familiarized with components of the ERCP that are applicable to their work scope on site during orientation or upon applicable changes in job scope as determined by management.
AES employees who have roles specifically outlined in the ERCP will be trained in the performance of such roles, initially and periodically.

Records of such training and drills will be maintained and signed off in SiteDocs2020>Resources>Emergency Response and Communication Plan (ERCP). (PUCT 25.53d(1)(A)-(E)

Emergency response plans have been generated for potential emergencies identified in the assessment/impact analysis. Where applicable, means of prevention will be described in addition to preparation for and response to situations. The person who arrives on scene and reports the problem will isolate the scene. This person will remain in charge until relieved by the designed IC.

Emergency Operations Plan (EOP)*PUCT 25.53(C)(5)(d)(1)A-E*

Objective

This section (EOP) of the ERCP outlines the preparation, preventative measures, and response to emergency situations that may affect the Buffalo Gap facility.

Scope

The EOP is applicable to all personnel performing work at Buffalo Gap. Emergency response for field personnel and persons in team leadership roles are defined in each emergency described in the EOP

Roles and Responsibilities

The General Manager is ultimately responsible for the content and implementation of the EOP.
The EHS Coordinator (site EHS Specialist) will maintain the formatting, add updates and revisions, and track such changes in the revision annex (B).

The NERC analyst assigned to the facility will have the authority to enact changes applicable to the scope of the EOP/ERCP to maintain compliance with all applicable regulatory agencies. Such changes should be coordinated with the EHS Coordinator to maintain document integrity, and the GM will be notified of changes to the document, being provided with the newest revision for review and approval.

Team Leaders will participate in an annual review of the EOP/ECRP and will provide input to ensure accurate planning, prevention, and response to emergency situations on their respective sites.

Other personnel may be designated to participate in annual or periodic reviews of the EOP/ERCP by site leadership to utilize their experience or expertise. Suggested changes may be implemented through the EHS Coordinator and NERC Analyst and are subject to review and final approval by the GM.

Approval and Implementation

The EOP contained within the ERCP is effective as of 10/02/2022 and replaces/supersedes any previous Emergency Action Plan (EAP) issued at the Buffalo Gap facility. The most recent approval date for the EOP may be found in the GM Affidavit on page (*). Revisions are documented in annex * of this document.
*PUCT 25.53(C)(5)(d)(2) is not applicable due to the facility not being a transmission/distribution entity.

Emergency Medical Situations

Prevention: AES persons and Contractors operating at Buffalo Gap put Safety first, assessing jobs, identifying hazards and mitigating them sufficiently to create a workplace free of recognized hazards.

Preparation: Buffalo Gap AES Wind Generation will ensure all employees are appropriately trained in CPR/First Aid, and AED. The O&M facility has two first aid kits, one located in the upstairs restroom hallway and one in the warehouse (door from main Lobby to Warehouse) across from BG3 Tech room. Three AEDs: upstairs hallway, downstairs hallway across from BG3 Tech room, and in the main warehouse located next to warehouse computer station. A backboard and basket stretcher are located under the stairwell in the warehouse. There are also first aid kits, AED, Eye Wash bottles, and Fire Extinguishers located in each company-owned vehicle on the premises. The contents of the first-aid kit(s) shall be inspected quarterly for expended items and such items will be replaced promptly.

Response: Employee Procedures for Medical Emergency (office, warehouse)
1) **Do Not** move victim unless safety dictates
2) Notify the EHS Safety Coordinator, Team Leader, and/or General Manager

3) If the injury appears to be life threatening or disabling, call 911
4) First Aid care and/or CPR may be provided by a trained employee, or the injured person can be transported to the appropriate medical facility by authorized personnel.

Response: Employee Procedures for Medical Emergency (field)

If the victim is on the ground, **DO NOT** move them unless safety dictates! If victim is up-tower, the turbine **MUST** immediately be disabled from operation per the appropriate Service Safety Checklist procedure.

1)   Assess the Accident Scene

     Upon arriving at the scene of an injury related accident, the first person shall survey the scene (is it safe?), then notify Team Leaders and EHS Coordinator.

     a)   Severity of the victim's injury
     b)   Emergency (911) personnel "are" or "are not" required.
     c)   The workers on scene my call 911, or delegate the call to another worker, Team Leader, or EHS
     d)   If the injury appears to be life threatening, be prepared to give "calling party" as much information as possible so that they can relay the information to 911.
     e)   On regular workdays, the EHS Safety Coordinator and Team Leaders should be notified immediately and will respond to the scene.
     f)   On weekends, the victim's work partner will call 911 if needed and dispatch another employee to:
     (1) rendezvous with the EMS vehicle or (2) coordinating which Air Evac landing location

3)   Maintain Radio Silence

     a)   Everyone who is not involved in the accident scene must observe radio silence.

4)   If Emergency Personnel Are Not Required

     First-aid may be provided by a trained employee and/or the victim may be transported to the appropriate medical facility by an assigned employee.

5)   If Emergency Personnel Are Required

     a)   On regular workdays, the Buffalo Gap designated person will acquire information from the field and call 911 to ensure complete and accurate information is given, as well as established ambulance and/or Air Evac evacuation points, if needed.
     b)   On weekends, the victim's work partner will call 911 for help, if needed. Once 911 call has been made and the victim is safe, a call will be made to the affected employees' supervisor and EHS Safety Coordinator.

Building Evacuations

1. Building evacuation will occur upon instruction by management personnel. Notification to building employees will be made via direct voice communication or phone
2. Be aware of all marked exits from your area and building. Know the routes from your work area. Marked exit signs are installed in all buildings. Evacuation plans are posted in various places within the building
3. Take note of physically handicapped individuals in your area that may need assistance
4. When instructed to evacuate, walk quickly to the nearest marked exit and ask others to do the same. On your way out, check for occupancy in the offices you pass, and, if unoccupied, shut those doors behind you. Use the nearest safe stairs and proceed to the nearest exit. Use handrails on stairs. **DO NOT** run, lag, scream, stop to get personal belongings, or return to the building until you are instructed to do so

5. All personnel should meet at their designated rendezvous location, until the roll call has been taken by a manager. Do not leave premises until accounted for and given permission to do so by authorized personnel. Keep fire lanes, hydrants and walkways clear for emergency crews and equipment

6. During emergencies, only personnel authorized by management will be allowed in the building to perform such responsibilities as shutting down power, potentially hazardous equipment, heat sources, gases, machines and other electrical equipment

7. If you become trapped in a building, **DO NOT PANIC**:
    - If a window is available, place an article of clothing outside the window as a marker for rescue crews
    - If there is no window, pound loudly on the wall and shout at regular intervals to alert emergency crews
    - During a fire, if there is no window, stay near the floor where the air will be less toxic
    - During a fire, if the door is warm, **DO NOT** open it. If smoke is entering the room through cracks around the door, stuff something in the cracks to slow the flow

Fires

Prevention: Any work that can or has the potential to use or produce flames or sparks, must be performed under the guidance of the AES Buffalo Gap Hot-Work program. Smoking on site is permitted only in designated areas. Vehicles must not be parked in grass while running. Trailer chains or other objects that could be dragged from a vehicle must be secure to prevent contact with the road that could create sparks.

Preparation: AES Buffalo Gap facility buildings are equipped with fire/smoke detectors and fire extinguishers. Site vehicles are equipped with fire extinguishers. Employees are trained on fire extinguisher use at hire and refresher training is given at least annually. A portable 200-gallon water tank/sprayer is available for outdoor hot-work job areas where there are no electrical hazards. Fire drills will be conducted at least annually and documented per the requirements listed in Drills section of the ERCP/EOP.

AES will not request employees to engage in the practice of fighting fires. Firefighting equipment is only to be utilized to extinguish small incipient stage fires. In the event the fire is large and fully developed, employees must leave and secure the area.

Response: Employee Procedures for Fires (office, warehouse, or shop)
1) Fire discovered by employee:
2) Confine the fire by closing doors to the area
3) Alert employees of fire by yelling "fire"; be sure to include the location
4) The employee will call 911
5) On hearing "fire", employees will evacuate the building using the closest exit route. Once employees have left the building, they may not go back in
6) Employees will assist visitors, contractors and any handicapped person with evacuation to the designated evacuation location (Muster Point)
7) Employees will immediately report to their supervisors in the designated evacuation location
8) Supervisors will assist the EHS Coordinator to perform employee roll call ensuring everyone is present. If employees are in the field, supervisors contact to ensure their location and safety
9) If possible, retrieve the Contractor/Visitor sign in log from main lobby

Response: Employee Procedures for Fires (field)
1) Fire discovered by employee:

2) Field personnel shall immediately report the fire to EHS and Team Leaders. Designated person will call "911"

3) For wildfires, stay upwind and crosswind of the fire while evacuating the area

Adverse Weather Conditions/Natural Disasters

Adverse weather can take many forms, including tornadoes, lightning, hurricanes, earthquakes, floods, or winter storms. These situations can impact the facility. Most adverse weather situations provide some degree of warning or buildup, which will allow for necessary preparations to be implemented. Adverse weather listed above, severe thunderstorms and lightning are the most likely to impact the site. Further information is available in annex (C)

Extreme Heat

Prevention: None.

Preparation: Ambient outdoor temperatures at Buffalo Gap can exceed 100°F. The temperature in places such as shops, turbine towers, and turbine nacelles may be even higher. Such temperatures pose a serious threat to the employees' health. Work should be scheduled for cooler parts of the day in warmer months. Work pace should be moderate, with frequent breaks. Ice, water, and air-conditioned areas are available to all workers at Buffalo Gap. All workers are trained to recognize the signs of heat illnesses and respond to them appropriately. Training is conducted at hire, and periodically throughout the year. An ice machine produces and stores ice at the O&M and is available to all AES personnel and contractors. Bottled water is also available at the O&M for all workers, and stock is maintained by site management. Popsicles and electrolyte replacement tablets are made available to all workers. Workers are also instructed to:
1. Drink plenty of fluids
2. Eat "light" foods, avoiding sugars
3. Wear a hat
4. Keep shirts on
5. Take breaks/rest periods in a cool environment air-conditioned vehicle

Response: If an extreme heat event (>100°F) occurs, work may be stopped if it is deemed unsafe or unhealthful. Workers are expected to stop work anytime symptoms of heat illness present in the field. Workers should watch for signs of heat illness including **heat cramps**, **heat exhaustion** (cool, moist skin with goose bumps when in the heat, heavy sweating, faintness, dizziness, fatigue, weak, rapid pulse, low blood pressure upon standing, muscle cramps, nausea, headache), and **heat stroke** (high body temperature, alteration in mood or behavior, hot, dry skin, flushing, nausea, vomiting, headache, rapid heart rate, rapid breathing, loss of consciousness).

In the event of heat cramps:

- Move to a cooler location, and rest or cool down
- Drink clear juice or an electrolyte containing drink
- Practice gentle range-of-motion stretching and gentle massage of the affected muscle group(s)
- Rest from strenuous activity for several hours or more after cramps subside

In the event of heat exhaustion:

- Rest in a cool place (shaded, ventilated area, or air-conditioned building/vehicle)

- Drink cool fluids, such as water or electrolyte drinks
- Loosen clothing
- Utilize cooling measures (fans, wet compresses, ice packs, etc.)
- Seek medical attention if symptoms do not improve within an hour

In the event of heat stroke:

- Activate EMS *IMMEDIATELY*
- Move victim to cool environment and loosen clothing
- Actively cool victim with any means available (fans, douse with water, immerse in water, place ice packs in groin and under arms, etc.)
- Monitor pulse and respirations, be prepared to perform CPR if necessary
- Heat stroke requires professional medical treatment, every time

Severe Thunderstorms

Prevention: None.

Preparation: Severe thunderstorms include heavy rain, hail, lightning, and tornadoes. Lightning is the greatest danger during a severe thunderstorm. Emergency supplies are located at the O&M. Back-up generators are installed at the O&M and substations to allow for continued site communication in the event of a power loss. Storms are tracked and monitored using Indji,

Response: Workers are notified of inclement weather or storms via text messages sent by Indji. In the event of a severe thunderstorm, site personnel must:
1. Remain indoors
2. Stay away from open doors or windows, metal pipes or electrical appliances
3. Immediately climb down from all turbines, towers, or poles
4. Lower all heavy equipment booms, retract outriggers, and exit man baskets
5. Watch for flash flooding

All personnel will prepare to leave the field when lightning is in the 50-mile watch zone, leave the field in the event lightning enters the 30-mile warning zone. Workers may exercise good judgement and stop work or vacate the turbines sooner based on the position of the storm, which may be closer to their respective position than the warning system indicates. If a site-wide evacuation is necessary, the Team Leaders or designated person will call all workers to one of the muster points, account for all personnel, and ensure they are able to leave site safely, or shelter in place.

Tornados

Prevention: None.

Preparation: See "Severe Thunderstorms" preparation guidelines.

Response: If conditions escalate to a tornado watch, all personnel will be directed to depart turbine areas. If a warning is issued all Buffalo Gap personnel will meet in the tornado room. **The tornado safe room is located downstairs in the kitchen of the O&M building.** See "Severe Thunderstorms" for additional response guidelines.

Flooding

Prevention: None

Preparation: Monitor local weather conditions. Take applicable steps from Severe Thunderstorm or Tornado guidelines if applicable.

Response:
1. Office/Warehouse
   a) If possible, disconnect electric motors and store in dry place
   b) If possible, put merchandise on pallets
   c) Shut off main power and valves
2. Field concerns, watch out for:
   a) Downed power lines
   b) Transformers down, exposing primary/secondary lines
   c) Control panels down, exposing secondary lines
   d) Turbines fallen over, exposing secondary lines

Lightning

Prevention: None

Preparations: Weather conditions should be monitored, and workers in the field notified via text, call, or radio if lightning is possible in their work area. Forecasts should be checked before any field work begins, and weather discussed during the pre-job briefing. The work limitations for lighting in the area are:
   a) **Watch Alert** is defined as confirmed lightning between 30-50 miles (48 and 80 km) from a Buffalo Gap Site. During a Watch Alert, all personnel are to be made aware of the lightning in the area and should be prepared to stop work and seek shelter as the storm moves closer

   b) **Warning Alert** is defined as confirmed lightning less than 30 miles (48 km) from a Buffalo Gap Site. During a Warning Alert, all personnel are to stop work immediately and seek shelter until the storm passes

   c) **All Clear** is given when the lightning is greater than 50 miles (80 km) out from a Buffalo Gap Site for more than 30 minutes

Response: When lightning occurs in wind farm areas, employees working outside should do the following:

1. Immediately climb down from all turbines, towers or poles
2. Immediately lower all heavy equipment booms, retract the outriggers, and exit the man baskets

3. Get to your work vehicle or heavy equipment cab and remain there
4. Maintain radio contact with supervisors for further instructions
5. As weather conditions develop and with the formation of thunderstorms, use extreme caution when working in the field paying special attention to developing weather conditions
6. Site personnel should understand when, where, and how thunderstorms develop. If there is thunder and lightning in an approaching cloud, all up-tower work will STOP, and all personnel will climb down and seek shelter
7. It is everyone's responsibility to make sure that all personnel are notified of lightning in the area
8. Contact the Team Leader or designee to inform them of lightning sightings
9. Team Leader or designee then notifies all personnel in the field that lightning is in the area
10. **EVERY** crew must respond by radio or other communications, acknowledging they have received the warning
11. Team Leader or designee will decide if the employees should return to the O&M building or wait in service trucks for the storm to pass
12. All work on tall, conductive structures will be stopped (this will include and is not limited to HV transmission lines, SCADA infrastructure, MET towers, or WTGs)

Fog

Prevention: None

Preparation: Check local forecasts, notify workers commuting to site and advise them to allow more time for travel.

Response:
1. All personnel work in groups of two or more employees
2. Notice will be made to management or office personnel when personnel are going on site
3. Site personnel will always have communication devices on their person
4. Reduce vehicle speed appropriate for visibility and conditions. Ice may also be present on roads requiring further reduction in vehicle speed

Snow/Ice

Prevention: None

Preparation: Check weather forecasts, notify workers to allow more time for travel. Monitor conditions throughout the day. Ensure vehicles are in good mechanical condition and fuel tanks are filled, workers have water and appropriate clothing, food stores at O&M are stocked, and vehicle rescue equipment is available.

Response:
1. During snow conditions monitor weather forecast frequently throughout the day
2. Dress appropriately for cold weather conditions
3. Plan - carry extra water and food
4. Carry company radio and/or cell phone
5. Use ice scrapers to clear windows and outside mirrors of vehicles of ice and snow
6. As needed, put company vehicles into 4WD

7. Carry snow chains, shovels and a tow strap
8. Beware of black ice
9. Drive and park company vehicles sufficiently away from wind turbines to prevent damage from falling ice. Use caution when driving through snow drifts and be careful when walking - rocks, boulders, holes, gullies, ravines, or drop-offs may be hidden underneath

Extreme Cold

Prevention: None

Preparation:
Standard Inventory: To address three of the basic needs, warmth, food and communication, all personnel are required to have the following items as standard inventory on their company vehicles or on their person before leaving to the operating facilities:
1. Two-way hand-held radio
2. Standard first-aid kit/AED
3. Warm clothing
4. Vehicle fuel tanks full

Shelter: If conditions warrant a need for shelter, and personnel are unable to leave the wind farm site, they have two options for shelter from the elements: their service vehicle or O&M building. Materials that must be stored in the safe house are as follows:
1. Three days' supply of food which does not require preparation, and which is rich in carbohydrates and protein
2. Three days' supply of water

Response:
1. All personnel work in groups of two or more employees
2. Notice will be made to management or office personnel when personnel are going on site
3. Site personnel will always have communication devices on their person
4. All personnel shall have as part of their first-aid training how to prevent, diagnose and treat health-related injuries that may be caused in extreme cold weather conditions (e.g., frostbite, hypothermia, etc.)

Earthquakes

Prevention: None

Preparation: Ensure emergency response supplies are stocked and accessible, including first aid supplies, flashlights, water, and communication equipment.

Response:
1. **Stay in the building.** Many injuries occur while people run through the building to the outside. It is possible to be hit by flying objects, falling plaster or other debris.
2. Assist any handicapped person and find a safe place for them.
3. **Drop, cover and hold.** Try to take cover under a table or other sturdy furniture. Kneel, sit or stay close to the floor. Hold onto furniture legs for balance. Be prepared to move with your cover and face away from windows. Doorways may not be the safest location for protection. If you are outside, stay outside. Go to a clear area away from buildings, trees and power lines

Immediately AFTER the earthquake:
1. Be prepared for aftershocks. Although usually less intense than the main quake, they can cause further structural damage
2. Gas leaks might be present. Do not use lanterns, torches, lighted cigarettes or open flames
3. If fire is caused by the earthquake, implement the fire procedures

4. If evacuation is ordered, follow building evacuation procedures

Field Response:
1. Move to an open area away from turbine towers, power lines and poles
2. Get low to the ground and balance yourself. The ground may move violently for several minutes

Immediately AFTER the earthquake:
1. Be prepared for aftershocks. Although usually less intense than the main quake, they can cause further damage
2. Use your radio to notify management of your status and position.
3. Remain at your designated rendezvous location until you have answered a roll call by a manager. **Do not** leave the premises until accounted for and given permission to do so by a manager. Valuable time could be wasted searching for personnel that have not followed correct procedures. You may be directed to return to the AES office location.
4. Only members of management can declare the state of emergency over and give permission to leave the designated rendezvous location or the AES shelter area

Material Spills

Prevention: All BG workers are trained in spill prevention, control, and countermeasures (SPCC), and all site personnel will operate withing the parameters of the BG-SPCC program for each respective site. The programs are available at: SiteDocs2020>Resources>BG-SPCC

Preparation:
Material spills can be classified into two distinct categories: *incidental releases* and *emergency releases.*

• Incidental Releases

Incidental releases are small, isolated releases of chemicals, such as cleaning solvents, which do not present or have the potential to cause injuries or require evacuation other than from the immediate release area. Incidental spills can be cleaned up by personnel who have received proper training under the AES global standard and have the proper safety equipment. Incidental releases do not require the response of emergency personnel and/or local fire department.

• Emergency Releases

Emergency releases are incidents that involve large quantities of chemicals and/or have the potential to cause injuries. A release that requires the response of an outside vendor, emergency personnel and/or local fire department is an emergency release.

Safety Data Sheets (SDS) for all chemicals used at BG can be obtained from:

http://apps.globalmsdslibrary.com/app/ss/cid/38WA1T6S5FSXC3C9ZJU7M4URBXP34S

Response:

If a spill or leak occurs in conjunction with a fire, workers must **IMMEDIATELY** evacuate the area and notify the fire department. First responders **MUST** be informed of the chemicals released in the area, and provided with SDS sheets if requested

Employee Procedures for Material Spills (Office)
1. Do not come in contact with the chemical

2. If the spill or vapors may cause an immediate threat to human life or health, evacuate the area **IMMEDIATELY**

3. If spill isn't immediately hazardous to life or health, unnecessary personnel should leave the immediate area. Visitors, contractors and handicapped personnel in the area may need help exiting.

4. Anyone who is contaminated by the spill should avoid spreading the contamination

5. Seal-off area to prevent contamination of others. If the product is known, obtain and consult the SDS, and follow the guidelines found therein

6. Initiate washing-off and first aid for anyone who has been contaminated by the spill

7. Report the incident to the EHS Safety Coordinator, Team Leaders or General Manager

8. Management will record the following information and inform the EHS Specialist:
   - Type of incident.
   - Injuries
   - Name and quantity of the material, if known
   - Possible hazards to persons or the environment

9. Containment and clean-up will be conducted by trained staff designated by management, following the applicable guidelines as shown in the section of this document entitled "Material Spill – Field"

10. If the spill has occurred in a warehouse/shop area, perform the following:
    - Isolate the area and open bay doors
    - Confine spill with the proper material
    - Turn off all oxygen tank valves
    - Turn off inert gas valves
    - If deemed necessary, remove all vehicles (including forklifts) from the building
    - If instructed to evacuate, follow the building evacuation guidelines

Employee Procedures for Material Spills (Field)

Identify spill "transportation" mechanism.
- Spill "transportation" mechanisms are routes by which the spilled material will move. These routes may include drains, sumps, towers, nacelle bedplate, blade hubs, channels, ducts, and exposed soils. Identify source, (gearbox, transformer, brake system, generator, main bearing and blade). If possible, note the condition of the source. Check for the following: gearbox casing cracks, defective hoses, ruptures, physical damage, valve leaking, and container damage.

Obtain the SDS for the product

Secure the Area:
- To secure the area, barriers such as caution tape or cones may be used. If more than one AES employee is available, perform a security role, keeping other employees out of the area while a second employee notifies a supervisor

Notify Supervisor(s):
- Once the area is secured so that an unsuspecting individual will not be harmed by the spill, the person who discovered the spill should notify the EHS Safety Coordinator and their supervisor.

Important information that needs to be conveyed to the EHS Safety Coordinator:
- Exact **location** of the spill
- **Volume** of material released
- **Rate** of release

- **Direction** of spill movement
- **Product** involved

Personal Protective Equipment (PPE): For most small spills, personal protective equipment may be limited to chemical resistant gloves, protective eyewear, and an apron. (Consult the SDS for handling instructions.)

Control the Spill: Stop the flow of material release, if possible, e.g., close valves, tighten hose connections, plugging a hole or breach, or righting a tipped container

Contain the Spill: Where "control the spill" refers to stopping the release at the source, "containing the spill" refers to stopping the movement of the spilled material once it has been released. Spill containment may include such things as using dirt dikes for ground related spills or temporarily sealing any openings in the bedplate for nacelle related spills. Absorbent pads and/or absorbent media such as "Bio sweep" or equivalent compounds can be used.

Clean Up: We use two basic means for cleaning up a spill. The material may be recovered and absorbed. Once the spill is cleaned up, the debris generated during this operation needs to be disposed of properly. Also, any contaminated equipment (including personal protective equipment) and personnel must be decontaminated

- **Recovery.**
  Interior / Exterior Tower Cleanup (WATER): The recovery of water generated from interior/exterior tower cleanup requires appropriate equipment, such as a special vacuum unit (e.g., bilge pump).
  Exterior Tower Cleanup (SOIL): Cleanup of contaminated soil may include the use of a shovel and or backhoe. All soil with visible traces of contamination must be removed and placed in DOT-approved drums
- **Absorption.**
  Absorption of a spill requires the use of a material that will not react with the spill but will soak it up; collecting it into a form that may be safely handled. The standard issue turbine rags are used for interior spills
- **Containers.**
  All materials recovered from a spill must be placed in DOT approved containment drums. Each container must be labeled before use
- **Decontamination.**
  The equipment and personnel decontamination are typically very easy. The following is a simplified overview of decontamination procedures. The actual steps taken should be appropriate for the materials/substances being handled during the spill cleanup. SDS's give specific recommendations on decontamination.
  PPE (e.g., gloves) utilized during clean up, must be properly disposed of. Gloves should be inverted so that contamination is "contained" inside the glove. Tools may also be washed in a mild soap and water solution.
  If an employee meets a hazardous or potentially hazardous substance, the affected area should be washed, using plenty of water and a mild soap (for skin).

8) **Reporting:** The requirements of the appropriate SPCC (Spill Prevention Control & Countermeasure) plan must be followed.

9) **Hazardous Waste Transportation:** Certified waste transporters must be used when transporting waste to a disposal/collection

site. AES uses DOT approved hazardous material contractors. All transported materials are documented via hazardous material manifest and if applicable reported to the appropriate regulatory agencies.

Bomb Threats/Sabotage

Prevention: None

Preparation: BG will conduct training at least annually via any approved method, to instruct workers how to respond to bomb threats. Training may be included with Active Shooter or other crisis response/management training. BG facility will maintain compliance with all NERC physical security requirements, and audit compliance as prescribed by AES corporate policy.

Response:

Bomb Threat

- Remain calm.
- Notify a facility supervisor, such as a Team Leader or EHS, who will notify authorities immediately
- Call 9-1-1 or your local law enforcement if no facility supervisor is available.
- Refer to the DHS Bomb Threat Checklist for guidance, if available.
- For threats made via phone:
- Keep the caller on the line as long as possible. Be polite and show interest to keep them talking. DO NOT HANG UP, even if the caller does.
- If possible, signal or pass a note to other staff to listen and help notify authorities.
- Write down as much information as possible—caller ID number, exact wording of threat, type of voice or behavior, etc.—that will aid investigators.
- Record the call, if possible.
- For threats made in person, via email, or via written note, refer to the DHS Bomb Threat Checklist and DHS-DOJ Bomb Threat Guidance for more information.
- Be available for interviews with facility supervisors and/or law enforcement.
- Follow the authorities' instructions.
- Facility supervisors and/or law enforcement will assess the situation and provide guidance regarding facility lock-down, search, and/or evacuation.

Suspicious Packages/Items

- Remain calm.
- Do NOT touch, tamper with, or move the package, bag, or item.
- Notify a facility supervisor, such as a Team Leader or EHS, who will notify authorities immediately
- Call 9-1-1 or your local law enforcement if no supervisor is available.
- Explain why the package, bag, or item appears suspicious.
- Follow instructions. Team Leaders, EHS, and/or law enforcement will assess the situation and provide guidance regarding shelter-in-place or evacuation.
- If no guidance is provided and you feel you are in immediate danger, calmly evacuate the area. Distance and protective cover are the best ways to reduce injury from a bomb.
- Be aware. There could be other threats or suspicious items.

Building Utility Failures

Prevention: None

Preparation: Ensure flashlights are available to facility workers in the O&M building. Inspect back-up generators on site periodically and verify their functional availability

Response:

1. Unless there is another related problem, such as a fire, remain in your designated work area until directed to do differently by a supervisor
2. Assist visitors as necessary
3. Use flashlights where available **DO NOT** use candles or other types of flame or heat-producing devices for illumination
4. Assigned personnel should place an emergency generator on-line to provide essential power to critical areas of the facility
5. Follow proper communication procedures

Building Plumbing Failures/Flooding/Water Leak

Prevention: Maintain septic system and water treatment system per manufacturer's instructions

Preparation: Review procedures with all site personnel

Response:

1. Cease using all electrically powered devices and equipment
2. Evacuate the immediate area to prevent injuries
3. Notify a manager immediately

Natural Gas Leaks

Prevention: Inspect systems such as heaters and generators that operate on natural gas or liquid propane (LP) periodically and replace any faulty or questionable parts.

Preparation: Review procedures with all site personnel

Response:

DO NOT SWITCH LIGHTS ON/OFF OR UNPLUG ANY ELECTRICAL EQUIPMENT. ELECTRICAL ARCING COULD TRIGGER AN EXPLOSION
1. Cease all operations
2. Evacuate area immediately
3. Notify a manager immediately

Ventilation Problems

Prevention: None

Preparation: None

Response:
If smoke or odors comes from the ventilation system, immediately notify a manager and if necessary, cease all operations and vacate the area. Ascertain cause of smoke or odor if possible, and shut off malfunctioning system (heat, A/C, etc.) Notify emergency services in case of fire or medical emergency resulting from exposure.

Power/Communication loss with ROCC and/or Buffalo Gap T-1 line

Prevention: Periodic assessment of communication systems conducted by appropriate AES personnel (IT, OT, CIP, NERC, etc.)

Preparations: Review response procedures with personnel periodically.

Response:
1. Form a Backup ROCC operations team, which shall consist of two (2) BG technicians per shift and (1) Team Leader on day shift
2. The rest of BG team reports to work as normal
3. The Backup ROCC shall operate on a 12-hour shift schedule and will be responsible for 24x7 operations
4. The Backup ROCC team will receive and implement deployment orders and be responsible for the operations of BG1, BG2 and BG3
5. Issue notices to AES Integrated Energy (AIE) at 937-259-79569 and aesusmarketops@aes.com to inform them of the temporary change in operation with correct contact information, including the dispatch call number
6. Communicate any changes in the situation to AES management as necessary
7. AES BG will inform AIE via email, with a copy to AES Palm Springs ROCC desk once operations return to normal

Crime, Violent Behavior & Civil Disturbances

Prevention: None

Preparation: Periodic review of response procedures with site personnel.

Response:

Crime and/or Violent Behavior (In progress)

If you are a victim or a witness to any criminal offense, report the incident as soon as possible, providing the following information:

1. Call "911"
2. Give the dispatcher: Nature of the incident, location of the incident, a description of the suspect(s) involved, a description of any weapons involved, and a description of any property involved
3. Notify a manager
4. Stay on the line with the dispatcher until a police officer arrives at the scene
5. Keep the dispatcher informed of any changes in the situation so that updated information can be relayed to the responding units. Even if you are the victim and unable to communicate further, try to keep the line open

Crime and/or Violent Behavior (Not in progress)

All crime should be reported. Be prepared to provide the following information to the investigating officer:

1. When the incident occurred
2. If a property crime, what was taken or damaged
3. The names and/or descriptions of any suspects or witnesses

Civil Disturbances

Any employee noting a possible civil disturbance should contact a manager immediately

1. If necessary, secure building entrances and exits
2. Should unauthorized intruders gain access onto premises, refrain from any contact with the intruders
3. All employees should remain in the area, remain calm and follow instructions from management
4. Should intruders gain access into the building and damage property, employees should not interfere. The personal safety of our employees is more important than the protection of our property

Gun Shots:

1. Immediately climb down from the turbine
2. Notify manager
3. Evacuate all personnel in the area immediately
4. Immediately report the following:
   - Type of incident
   - Are there any injuries
   - Location of the source of gunfire

Active Shooter

Prevention: None

Preparations:

1. Incident Command Team (ICT) or Senior Management should establish a procedure for review of existing emergency plans on a regularly scheduled basis (at least annually).

2. ICT or Senior Management should establish a procedure for performing a hazard vulnerability analysis review and threat assessment to determine necessary resources to respond to an Active Shooter incident (at least annually).

3. Buffalo Gap Facility should conduct drills/exercises to test response to an Active Shooter emergency that includes all areas/personnel as well as local, regional, state and private sector partners.

4. Buffalo Gap Facility should develop an after-action report (AAR) to evaluate current policies and procedures and update plans based on the AAR's strengths and areas for improvement.

5. An Active Shooter is an individual actively engaged in killing or attempting to kill people in a confined and populated place; in most cases, active shooters use firearms and there is no pattern or method to their selection of victims. Active shooter situations are unpredictable and evolve quickly. Typically, the immediate deployment of law enforcement is required to stop the shooting and mitigate harm to victims. Because active shooter situations are often over within 10-15 minutes, before law enforcement arrives on the scene, individuals must be prepared both mentally and physically to deal with an active shooter situation.

6. An active shooter in your workplace may be a current or former employee or an acquaintance of a current or former employee. Staff may notice characteristics of potentially violent behavior in an employee. Alert your Human Resources Department or Management if you believe an employee exhibits potentially violent behavior.

7. To best prepare staff for an active shooter situation, create an Active Shooter emergency plan/procedure and conduct training exercises. This will prepare staff to effectively respond and help minimize the loss of life. The most effective way to train staff to respond to an active shooter situation is to conduct mock active shooter training exercises. Local law enforcement is an excellent resource in designing training exercises.

   - Ensure the facility has at least two evacuation routes
   - Post evacuation routes in conspicuous locations throughout your facility
   - Be aware of indications of workplace violence and take remedial actions accordingly
   - Institute access controls (keys, security pass codes)
   - Make sure plans include relevant information and address individuals with special needs/functional needs

8. Assembling crisis kits

   - Radios
   - Floor plans
   - Staff roster with contact information
   - First aid kits/AED
   - Flashlights

9. Components of an Active Shooter Training Plan

- Recognizing the sound of gunshots
- Reacting quickly when gunshots are heard and/or when a shooting is witnessed
- Evacuating the area
- Hiding out
- Acting against the shooter as last resort
- Calling 911
- Reacting when law enforcement arrives
- Adopting the survival mindset during times of crisis

Response:

Quickly determine the most reasonable way to protect your own life. Remember that injured people are likely to follow the lead of employees and managers during an active shooter situation.

1. Take note of the two nearest exits
2. If you are in an office/room, stay there and secure the door (door should open in)
3. If you an in a hallway, get into a room and secure the door (door should open in)
4. Call 911 when it is safe to do so and alert police to the shooter's location. If you cannot speak, leave the line open and allow the dispatcher to listen
5. If an active shooter is nearby: lock the door, silence your cell phone, turn off any source of noise, hide behind large furniture or other fixtures and remain quiet

- **Evacuate:** (if escape route is accessible)
  - Have an escape route in mind
  - Evacuate regardless of whether others agree to follow
  - Leave your belongings behind
  - Help others escape, if possible
  - Prevent individuals from entering an area where the active shooter may be
  - Keep your hands visible
  - Follow the instructions of any police officers
  - Do not attempt to move wounded people
  - Call 911 when you are safe
- **Hide Out:** (if evacuation is not possible)
  - Hiding place should be out of shooter's view
  - Provide protection if shots are fired in your direction
  - Do not trap yourself or restrict your options for movement
  - Lock the door
  - Blockade the door with heavy furniture (door should open in)
- **Take-Action:** (Last Resort, imminent danger)
  - As a last resort, attempt to take the active shooter down. When the shooter is close range and you cannot flee, your chance of survival is much greater if you try to incapacitate him/her
  - Attempt to disrupt and/or incapacitate the active shooter
  - Act as aggressively as possible against him/her
  - Throwing items and improvising weapons
  - Yelling
  - Commit to your actions

Recovery

1. Critical Incident Stress Debriefing and/or counseling should be made available to impacted parties to provide any necessary physical, emotional and psychological support.
2. ICT or Senior Management should develop an AAR/IP that addresses Buffalo Gap Facility areas of strength and areas for improvement that can, later, be incorporated into Buffalo Gap Facility operating procedures to enhance future response.

Pandemic

This procedure is to provide a guide if we experience a Pandemic outbreak at the AES Buffalo Gap facilities, ROCC facilities, or at the AES Buffalo Gap and Palm Springs facilities. This will only be instituted on a temporary basis until normal operations can resume.

Prevention: None

Preparation: Periodically review response procedures with site personnel. Ensure Team Leaders are familiar with the response and their roles therein.

Response:

Pandemic Emergencies (Outbreak in Abilene, ROCC functioning)

1. An Essential Personnel Team (EPT) must be formed consisting of one (1) BG leader and two (2) technicians. Team will rotate as needed
2. All BG personnel except for the (EPT) shall remain at home and not report to site
3. (EPT) shall report to the site during normal 8-hour work shift, Monday – Friday, and shall be responsible for the day-to-day operations of the business and no ROCC coverage required at the site
4. Main gate to the office compound and the O&M building doors will remain locked while personnel are on-site in addition to being locked after-hours
5. Inspect weekly the on-site gasoline/diesel tanks and verify adequate quantity in storage
6. Stock sufficient food and water on site as emergency supplies
7. All BG personnel to report to the on shift (EPT) of their personal situation daily
8. Daily conference calls will be held between BG leaders and the on-shift (EPT) to communicate the situation at the site as well as the BG personnel situations
9. Communicate any changes in the situation to AES management as necessary

Pandemic Emergencies (Outbreak at ROCC, Abilene functioning)

1. Form a temporary Backup ROCC operations team, which shall consist of two (2) BG techs per shift and (1) TL on day shift
2. The rest of BG team reports to work as normal
3. The Backup ROCC shall operate on a 12-shift schedule and will be responsible for ROCC operations
4. Issue notices to ATE at 937-259-7956 and acsusmarketops@aes.com to inform the temporary change in operation with correct contact information, including the dispatch call number
5. Communicate any changes in the situation to AES management as necessary

Pandemic Emergencies (Outbreak at Abilene and ROCC)

1. An (EPT) will be formed consisting of one (1) TL on day shift and two (2) Technicians per shift
2. All BG personnel except for the (EPT) shall remain at home and not report to site
3. EPT shall report to work on a 12hr shift schedule. EPT shall be responsible for the day-to-day operations of the business, including the ROCC operations. One technician on each EPT shall act as the Backup ROCC operator
4. Issue notices to AIE to inform the temporary change in operation with correct contact information, including the dispatch call number.
5. Issue notices to AIE at 937-259-7956 and aesusmarketops@aes.com to inform the temporary change in operation with correct contact information, including the dispatch call number
6. Main gate to the office compound and the O&M building doors will remain locked while personnel are on-site in addition to being locked after-hours
7. Inspect weekly on-site gasoline/diesel tanks and verify adequate quantity in storage
8. Stock sufficient food and water on site as emergency supplies
9. All BG personnel to report to the on shift (EPT) of their personal situation daily
10. Daily conference calls will be held between BG leaders and the on shift (EPT) to communicate the situation at the site
11. Report to GM daily
12. If no persons from either Palm Springs or Buffalo Gap sites are available then, remote facilities will be requested to oversee the park operations

Tower Rescue

Tower Rescue Program, is to educate, inform, and prepare AES Wind Generation – Buffalo Gap Technicians, Management, and Contractors to be aware of hazards from working at heights. This section will outline a basic plan for self-rescue from heights and assisted rescue from heights. This section of the Buffalo Gap Emergency Medical Action Plan is intended for **Authorized Personnel** trained in Tower Rescue provided by AES or a recognized Tower Rescue training program. All turbine rescues, including self-rescue with no injuries, must be reported to site management and EHS immediately.

Procedure for Tower Rescue (Assisted Rescue from Turbine)

1. First assess the situation to verify that the fall did not damage the anchor that they were connected to, i.e., 9mm cable, anchor point etc.
2. After you deem the area safe to approach begin rescue procedures, First Aid, if necessary, and call for help.
3. In the event an assisted rescue occurs, all personnel should use the best method of rescue available, while using the training they have been given to properly use the life saving device.

Procedure for Tower Rescue (Response to Assisted Rescue from Turbine)

1. When technicians in the field hear a call for assistance at a location over the radio, they will respond if possible
2. The closest technician will call other technicians on the radio and inform them that they will be there first and begin climbing to assist if needed or provide down-tower support.
3. If additional rescue supplies are needed up-tower, start lowering the hoist if possible
4. The second team in response will post their truck at the entrance gate to that row. These people will flag all emergency vehicles to the location of the incident.
5. In the event the victim needs a helicopter for their injuries then locate the nearest Pre-Established Landing Area (PELA) to your location and call the Air Evac Life team. Tell Air Evac what site you are on and the (PELA) number. You need to also inform them of the proximity of your location to that (PELA) and anything to look

for to identify your location. This could be anything from a cluster of vehicles to two vehicles parked diagonal to each other making an X with their headlights to identify a proper place to land.

Procedure for Tower Rescue (Self Rescue from Turbine)

- In case of a self-rescue from a Wind Turbine; Self-rescue is the last means of exiting the wind, turbine and should not be conducted if any other means of exiting are possible. All AES personnel will be properly trained in self-rescue during the rescue training course and will be asked to perform self-rescue under the supervision of a certified trainer.

Employee Procedures for Tower Rescue (Response to Self-Rescue from Turbine)

- In the response to a Self-Rescue from a wind turbine, there are a few very important steps to follow. In the case that a AES employee or contractor needs to perform a self-rescue, assess the situation, **DO NOT** put yourself in harm's way, contact base radio and all employees to notify that the situation has occurred. Once everyone is aware of the situation, begin self-rescue from wind turbine.

General Manager Affidavit – *PUCT 25.53(c)(4)(C):*

1. 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 extend deviations are appropriate because of specific circumstances during an emergency.

2. The EOP has been reviewed and approved by the appropriate executives

3. Drills have been conducted to the extent required by subsection (f) of PUCT 25.53(c)(F)(4)-(5)

4. The EOP or an appropriate summary has been distributed to local jurisdictions as needed

5. The entity maintains a business continuity plan addressing the return to normal operations after disruptions caused by an incident

6. 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 IS-800 National Incident Management System training.

Signature: *Vince Lesko*   Date: 02/27/2023

Annex (A) – Review and Revision History

Document Review		
Reviewed by	**Date**	**Revision number**
R Quezada	2/25/2023	1

Annex (B) – Distribution (PUCT) 25.53(C)(4)(A)(i)-(ii)

ERCP/EOP Distribution and Training			
First Name	Last Name	Position	Date received
Derek	Floyd	BG1 Tech	2/21/2023
Jonathan	Richardson	BG1 Tech	2/21/2023
Richard (Rick)	Humecky	BG1 Tech	2/21/2023
John	Hogue	BG2 Tech	2/21/2023
Juan	Cerna	BG2 Tech	2/21/2023
Manuel	Vasquez	BG2 Tech	2/21/2023
Michael	Mills	BG2 Tech	2/21/2023
Stefan	Limones	BG2 Tech	2/21/2023
Treavor	Hobbs	BG2 Tech	2/21/2023
Trenton	Bounds	BG2 Tech	2/21/2023
Zachary	Hogue	BG2 Tech	2/21/2023
Mason	McClain	BG2 Tech	2/21/2023
Bryson	Florez	BG2 Tech	2/21/2023
Clifton	Golden	BG2 Tech	2/21/2023
Johnathan	Maples	BG2 Tech	2/21/2023
Lolly	Bradbury	BG2 Team Leader	2/21/2023
Mark	Hagood	BG2 Lead Tech	2/21/2023
Case	Braswell	BG3 Tech	2/21/2023
Triston	Dean	BG3 Tech	2/21/2023
Zachary	Williams	BG3 Tech	2/21/2023
Gayland	Blaylock	BG3 Tech	2/21/2023
Austin	Miller	BG3 Tech	2/21/2023
Justin	Calcote	BG3 Team Leader	2/21/2023
Kyle	Phelps	BG3 Lead Tech	2/21/2023
Jeff	Ludlum	BOP	2/21/2023
Jeremy	Kingston	EHS	2/21/2023
Juan	Perez	Warehouse	2/21/2023
Tim	Hardin	Planner	2/21/2023
Robert	Quezada	NERC	2/21/2023

Annex (D) – Load Shed PUCT 25.53 (C)(e)(1)(B)

Not applicable to BG facility.

Annex (G) – Hurricane PUCT 25.53 (C)(e)(1)(F) and PUCT 25.53 (C)(e)(2)(E)

Not applicable to BG facility.

Annex (J) – Transmission and Distribution PUCT 25.53 (C)(e)(1)(H)

Not applicable to BG facility.

Annex (K) Water Shortage Index PUCT 25.53 (C)(e)(2)(B)

Not applicable to BG facility.

Annex (C) – Weather Emergencies (PUCT)25.53 (C)(e)(1)-(2)

(i) Cold weather operational plan

Ice & Snow Conditions

Ice & Snow conditions can occur in the winter period from October to April. Senior management will use forecast information in advance (the day before) to enact this guidance.

- In the event of Severe Cold (<32°F), Ice, and/or Snow forecast, AES ROCC (24 hr. monitoring team) will be notified by Indji based on the weather conditions with potential operational impact.
- Historically ice and/or snow accumulations great enough will cause turbines to shut down until removed
- A Wind Icing Checklist form will be completed on Site Docs to determine if it is safe to work in the weather conditions. The form may be found on SiteDocs>Forms>Inspections>Wind Icing Checklist.
- If falling ice is observed on site, work in the field will be stopped until conditions are no longer hazardous. In critical situations where work must be performed to protect grid integrity, the safe work procedures contained in this annex must be observed.

Accumulations great enough could possibly cause damage to overhead collection lines and main 138kV transmission lines. Potential outages or communication interruptions will be reported to ROCC and DE as necessary.

In the event of extremely low Temperatures:
- BG1: -4°F (-20-°C)
- BG2: 23°F (-5°C)
- BG3: 14°F (-10°C)

Turbines may fault and not return to service until temperatures rise above the minimum operating temperature.

The ROCC team will relay information to AIE (QSE). Updates will be made, at a minimum, every 24 hrs. until the severe weather threat has passed.

BG Safety Coordinator (SC) will ask for volunteers in November to act as road scouts, soliciting individuals who travel from Abilene and Sweetwater to cover the most frequent roads used by BG employees.

The BG SC will look at the TXDOT road closure website for possible issues with road availability when icing problems are known. If it is determined that road closures/problems are a possibility the SC will activate the scouting system which will:
- Ask the scouts to arrive early to the plant (around 6:00 am) if the roads are safely passable.
- Pass on information and opinion to the BG SC on the road conditions.
- If a scout is unable to get to the plant, they will contact the SC by phone.

If the scouts and SC determine that the roads are hazardous the SC or designee will:
- Contact BG's General Manager (GM) or designee and inform them of the road problem and on the GM final recommendation the T/L's and Lead Techs will:
- Send out e-mails and phone texts to the BG employees on:
- A later arrival time to come to the plant; or
- Cancelation of work activities for that day.

For icing conditions that occur through the day the GM or designee to determine if early release is warranted. If early release is needed the SC and or Team Leaders (T/L) will contact their employees and inform them to return to the O&M building and leave the plant.

The SC or T/L will pass on pertinent information to the employees on the next day plan of action.
If the road scouting system needs to be activated for the following morning the SC will inform the scouts.

Field Work Activities – Icy Conditions

Should icing occur on WTG's that have county roads or high traffic roads that are within 100 meters, these WTGs should be shut down by SCADA until the risk of shedding ice no longer exists.

Weather forecasts must be consulted at the beginning of each work shift or the day before to prepare for any inclement weather. Be aware of current temperatures, if temperatures are above freezing (32°F, 0°C) or at/slightly below freezing with turbines in direct sunlight, shedding of ice may occur, do not attempt to enter areas where ice may fall.

If ice is observed shedding in your area do not attempt to enter. Go to a safe location and contact site management immediately

In cold conditions in which the weather is favorable for ice forming, an initial inspection from a safe location shall be performed before any work begins on the WTG tower.

The Lead Techs or designee and SC will make an ice check on the turbines. The group will make recommendations to the park's T/L will have the final say if:
- Work will be delayed; or
- Cancelation of work activities for that day.

If ice is discovered after the completion of an ice check (build-up throughout the day or previously unseen ice on the nacelle, etc.) work is to stop immediately and all BG employees are to climb down the tower.

Notification of the change in conditions will be given over the plant radios or cell phones. Everbridge notification system may also be utilized.

- The Lead Techs, T/L's or SC will pass on the information.
- The T/L and/or Lead Tech is responsible for getting a head count and notify the SC if a team is missing or late returning to the O&M Building.
- Before exiting the tower, personnel must get clearance from the down tower person when it is clear to exit.
- The bottom tower person will remain 300 feet away from the tower and use eye site or binoculars to pass on information to the tower people when it is clear to exit the tower.
- Stop the turbine from a remote location via SCADA. Yaw the Nacelle to the desired location via SCADA. (Preferably to align the blades opposite of entry door).
- Once all motion has stopped wait several minutes to ensure no ice is shedding before approaching the turbine.

When transitioning from the concealment of your vehicle to the turbines during icing conditions you are required to wear ANSI approved hard hats in lieu of Petzl climbing helmets. Hard hats can be exchanged for climbing helmets once inside the tower.

Transfer of tools and equipment from the vehicle to the tower will be as quick and prudent as safely possible. Once the tools and equipment are inside the tower, the truck will be parked upwind from the tower at least 100 meters.

If falling ice is observed during work activities, technicians will be confined to work inside the tower or nacelle. Onsite personnel will notify the lead technician of conditions.

The top of the nacelle must be safely inspected while securely standing inside the nacelle. If ice is present on the walking surface, then no access is permitted on the exterior of the nacelle. Do not attempt to remove any ice from the exterior of the nacelle.

At least one crew member must be designated to watch for any falling ice or potential of ice throws from blades
The designated crewmember must have radio communication with the rest of the team. And be located a safe distance from the WTG.

- Approach the WTG with extreme care and park the service vehicle a safe distance away from the turbine.
- Approach the WTG from behind the hub to decrease risk of being hit if ice falls from the hub.
- Use binoculars or spotting scope to help identify ice on blades, nacelle, or hub. If ice is encountered notify site management immediately before proceeding.
- It is everyone's responsibility to make sure that all personnel are notified of ice on external WTG equipment.
- EVERY crew must respond by radio or other communications, acknowledging they have received the warning.
- No work shall be performed on top of or in the 300-meter zone of the WTG, including any transitions to the Hub, anemometry tower or FAA lights if there is ice present on the blades, nacelle, hub or entry steps and handrails.
- All WTG work in or on the towers must be postponed until the ice has shed and there is no more danger of ice falling from the towers.
- When personnel are already inside of a WTG when shedding begins, exiting from the tower is prohibited until the shedding event has ceased.
- All service vehicles, service personnel, contractors and operations employees outside of the WTGs in the field, must leave all turbine areas until all ice has ceased to shed.

Local SCADA control operations procedure
During the event of the site being or under immediate threat of being inaccessible due to hazardous weather then designated personnel will stay at the site for security and operations requirements.

Buffalo Gap has enough food storage of three (3) days, and enough sanitary provisions to last throughout the duration of typical length of time. All personnel responsible for operating the site during emergency conditions due to weather will be relieved of their duties at least every 3 days, or as soon as possible.

Cold Weather Preparation/Winterization Checklist

Start in September the completion process of the Cold Weather Checklist in Site Docs>Forms>Inspections>Winterization Checklist.

Freezing Fog

Freezing Fog normally occurs during the months of October to April. If the fog during winter months causes problems with icing on the turbines BG will follow the guidance stated previously in the policy.

Inclement weather checklist and inventory can be found on Site Docs>Safety

(ii)Hot Weather operational plan

Hot weather (>90°F) can impact production capabilities of wind turbine generators (WTGs) at the Buffalo Gap facility. When the ambient temperature climbs above the fault thresholds, turbines will shut down to protect internal equipment until the temperature drops below the fault threshold. The maximum operating ambient temperatures of the WTGs at BG are:
- Vestas: 100°F (38°C)
- GE: 140°F (60°C)
- Siemens: 95°F (35°C)

Notification

ROCC will be notified of the weather forecast by Indji if the temperature forecast is above 95F, to prepare for potential losses of production. DE will be notified of potential losses by the ROCC as appropriate.

Non-critical maintenance work will be suspended if energy demand is high and troubleshooting work will take priority to ensure maximum availability of park assets.

Temperatures will be monitored with WGBT locally, to calculate Thermal Work Limit (TWL) for personnel safety.

- In TWL <115 (High Risk, Restricted Zone), no person to work alone, no unacclimatized person to work and work limited to essential maintenance or rescue operations.
- In TWL between 115–140 (Medium Risk, Buffer, or Cautionary Zone), Cautionary indicates situations in which environmental conditions require additional precautions to reduce heat stress, working alone to be avoided if possible and un-acclimatized workers must not work at all.
- In TWL 140–220 (Low Risk, Acclimatization Zone), workers with uncertain acclimatization status should not work alone in this zone; TWL >220 (Unrestricted Zone) unrestricted work, and no limits on self-paced work for educated, hydrated workers.

If the TWL drops below 115, workers may be removed from the field and park availability will be monitored remotely. Turbines may be reset remotely or placed in a pending status (pause, repair, local) until the TWL rises sufficiently that personnel may work safely and perform necessary repairs. No work except critical repairs may be permitted, and then only to acclimatized workers having access to hydration, rest, and shade, at a pace to be set by their individual tolerance. If personnel show signs of heat illness, work is to be stopped per the EOP.

Annex (E) – Pandemic PUCT 25.53 (C)(e)(1)(C) and (PUCT)25.53 (C)(e)(2)(D)

Pandemic Emergencies (Outbreak in Abilene, TX: ROCC functioning)

10. Form "Essential Personnel Teams". An "Essential Personnel Team" (EPT) consists of one (1) BG leader and two (2) technicians, team will rotate as needed
11. All BG personnel except for the (EPT) shall remain at home and not report to site
12. (EPT) shall report to the site during normal 8-hour work shift, Monday – Friday, and shall be responsible for the day-to-day operations of the business and no ROCC coverage required at the site
13. Main gate to the office compound and the O&M building doors will remain locked while personnel are on-site in addition to being locked after-hours
14. Inspect weekly the on-site gasoline/diesel tanks and verify adequate quantity in storage
15. Stock sufficient food and water on site as emergency supplies
16. All BG personnel to report to the on shift (EPT) of their personal situation daily
17. Daily conference calls will be held among BG leaders and the on-shift (EPT) to communicate the situation at the site as well as the BG personnel situations
18. Communicate any changes in the situation to AES management as necessary

Pandemic Emergencies (Outbreak at ROCC: Abilene, TX functioning)

6. Form a temporary Backup ROCC operations team, which shall consist of two (2) BG techs per shift and (1) TL on day shift
7. The rest of BG team reports to work as normal
8. The Backup ROCC shall operate on a 12-shift schedule and will be responsible for ROCC operations
9. Issue notices to AES Integrated Energy (AIE) at 937-259-7956 and aesusmarketops@aes.com to inform the temporary change in operation with correct contact information, including the dispatch call number
10. Communicate any changes in the situation to AES management as necessary

Pandemic Emergencies (Outbreak at Abilene and ROCC)

13. Form "Essential Personnel Teams". An "Essential Personnel Team" (EPT) will consist of one (1) TL on day shift and two (2) Technicians per shift

14. All BG personnel except for the (EPT) shall remain at home and not report to site

15. EPT shall report to work on a 12hr shift schedule. EPT shall be responsible for the day-to-day operations of the business, including the ROCC operations. One technician on each EPT shall act as the Backup ROCC operator

16. Issue notices to ATE to inform the temporary change in operation with correct contact information, including the dispatch call number

17. Issue notices to ATE at 937-259-7956 and aesusmarketsops@aes.com to inform the temporary change in operation with correct contact information, including the dispatch call number

18. Main gate to the office compound and the O&M building doors will remain locked while personnel are on-site in addition to being locked after-hours

19. Inspect weekly on-site gasoline/diesel tanks and verify adequate quantity in storage

20. Stock sufficient food and water on site as emergency supplies

21. All BG personnel to report to the on shift (EPT) of their personal situation daily

22. Daily conference calls will be held between BG leaders and the on shift (EPT) to communicate the situation at the site

23. Report to AES management on daily basis

24. If no persons from either ROCC or Buffalo Gap sites are available on site, park operation oversight will be delegated to Buffalo Gap personnel to be monitored from home.

Annex (F) – Wildfire PUCT 25.53 (C)(e)(1)(D)

Response: Procedures for Fires (office, warehouse, or shop)

1. Fire discovered: EOP activated.
2. ISOC automatically notified by activated fire alarm system, will activate EMS remotely.
3. Site operation oversight duties will be assumed by ROCC, until local operations can be re-established locally.
4. In the event operational oversight cannot be re-established, site leadership will coordinate with ROCC to schedule operations and oversight with local remote personnel.

Response: Employee Procedures for Fires (field)

1. Fire discovered by employee: EOP activated.
2. Field personnel shall immediately report the fire to EHS and Team Leaders. Designated person will call "911".
3. ROCC and/or AIE will be notified by site leadership as soon as possible.
4. Fire location will be reported so potential losses can be assessed by ROCC and reported to AIE as appropriate.
5. Field personnel may be evacuated, and remote operational control will be implemented locally at the BG O&M or other designated location.
6. In the event the O&M is compromised, ROCC may assume operational responsibility for the park, until local control can be re-established.

Annex (H) – Cyber Security PUCT 25.53 (C)(e)(1)(G) and PUCT 25.53 (C)(e)(2)(F)

Cyber Security Incident Response Plan
The ISCT created and maintains a Cyber Security Response plan for BES Cyber Systems classified as Low Impact based on the criteria in CIP-002-5.1 Attachment 1 Section 3. The Cyber Security Incident Response plan defines how cyber events should be identified, classified, responded to, prevented when possible, analyzed, contained as needed, communicated to the appropriate internal and external authorities, and documented.

AES Definitions

• **Low Impact Electronic Security Perimeter (LIESP)** – This is a logical boundary created to protect Low Impact Cyber Assets from logical access by unauthorized individuals.
• **AES US** – This subsidiary of the AES Corporation oversees the management of generation, substation, and control Facilities throughout the United States.
• **Infrastructure Security (IS)** – The shared services organization within the US SBU that is responsible for the physical security, cyber security, and CIP compliance for each of the Facilities within the US SBU footprint.
• **Infrastructure Security Compliance Team (ISCT)** – The team of individuals within the IS shared service group that is responsible for the creation, implementation, and maintenance of the Low Impact Policies and Plans for the Facilities within the US SBU footprint.
• **Intelligence Security Operations Center (ISOC)** – This team within the IS shared service is responsible for the monitoring of physical and cyber controls implemented throughout AES US operations. Members of this team are also responsible for threat identification and analysis for AES Facilities in the US.

Methods used by Infrastructure Security and end-users to identify cyber incidents include:
i. Monitoring of secure networks 24x7x365 by ISOC Operators.
ii. End-users are taught how to identify cyber and physical events during training and incident exercises.
iii. Monitoring applications, monitored and configured by Infrastructure Security Admins are configured to send alerts when malicious code, command and control traffic, or other suspicious traffic are detected on the secure networks

Classification as a Reportable Cyber Security Incident

a. Cyber events and actual or attempted physical events are classified and reported requirements identified using the EV-008 Incident Identification, Classification, and Reporting Tree spreadsheet. The spreadsheet is used to break down the event into the following areas:
i. The detection method used to identify the event.
ii. The nature of the event, whether it is a non-issue (an accidental or false alarm), a suspicious event, or a malicious event.
iii. Whether the event was an unsuccessful or successful attempt to compromise and/or disrupt an applicable perimeter, BES Cyber System, or an EACMS associated with the BES Cyber System.
iv. The BES Cyber Asset, Cyber System, and/or perimeter where the attempt was focused.
v. A list of reportable criteria for the attempt or incident event.
vi. Any reporting obligations, including any follow-up reporting requirements.

b. Physical events which would be classified as non-issues are not recorded using the EV-008 Incident Identification, Classification, and Reporting Tree spreadsheet, but instead are entered into the AES Resolver document management application.

In addition, the ISCT may choose to provide E-ISAC with information depending upon the circumstances surrounding the following events to help improve the awareness to threats common to the industry:

i. Suspicious Activities at AES US facilities

ii. Protests/Picketing at AES US facilities

iii. Phishing emails

iv. Social engineering attempts

Priority

A priority is assigned to an incident based on the factors listed below to get the incident resolved and closed as quickly as possible. The priority is assigned by the Technical Lead, along with feedback from the Team Lead and the Infrastructure Security Lead, to assist in escalating urgency amongst Incident Response Team (IRT) members. The priority is based on overall impact and does not imply a service level time frame.

a. High – impacts the real-time ICS system and communications to the facility's Reliability Coordinator or Balancing Authority.

b. Medium – impacts secondary systems that feed off delayed ICS statistics and the facility's Reliability Coordinator or Balancing Authority sources.

c. Low – impacts contained to a workstation, single monitoring device or non-critical cyber asset.

d. Guarded – an unsuccessful attempt at securing unauthorized access, implanting a Trojan or otherwise attempting to sabotage the secure networks which resulted in Security Support staff or defensive countermeasures detecting and stopping the attack.

Escalation

Based on the priority and impact of the incident, the Team Lead, with feedback from the Technical Lead and Infrastructure Security Lead, may escalate the incident to other members of the IRT. This decision is based on the technical expertise that the other members can offer to assist with the resolution of the incident.

a. Alerts - Received by the designated administrators of the monitoring applications as well as the system operators and/or the cyber security personnel manning the 24/7 ISOC. If the alert meets reporting criteria the Team Lead, Technical Lead and Infrastructure Security Lead are notified.

b. Events - Analysis of incoming alerts is done by the Team Lead with the support of the Technical Lead, Infrastructure Security Lead and any other IRT members that are required based on the nature of the event.

c. Resolve or Escalate - If an event can be resolved by the Team Lead, Technical Lead, and/or the Infrastructure Security Lead, then the event can be closed as 'Resolved'. If other persons outside of the IRT need to be notified or consulted, then the Team Lead or the Infrastructure Security Lead can escalate the event to include those additional people.

EV-008 Incident Identification, Classification, and Reporting Tree
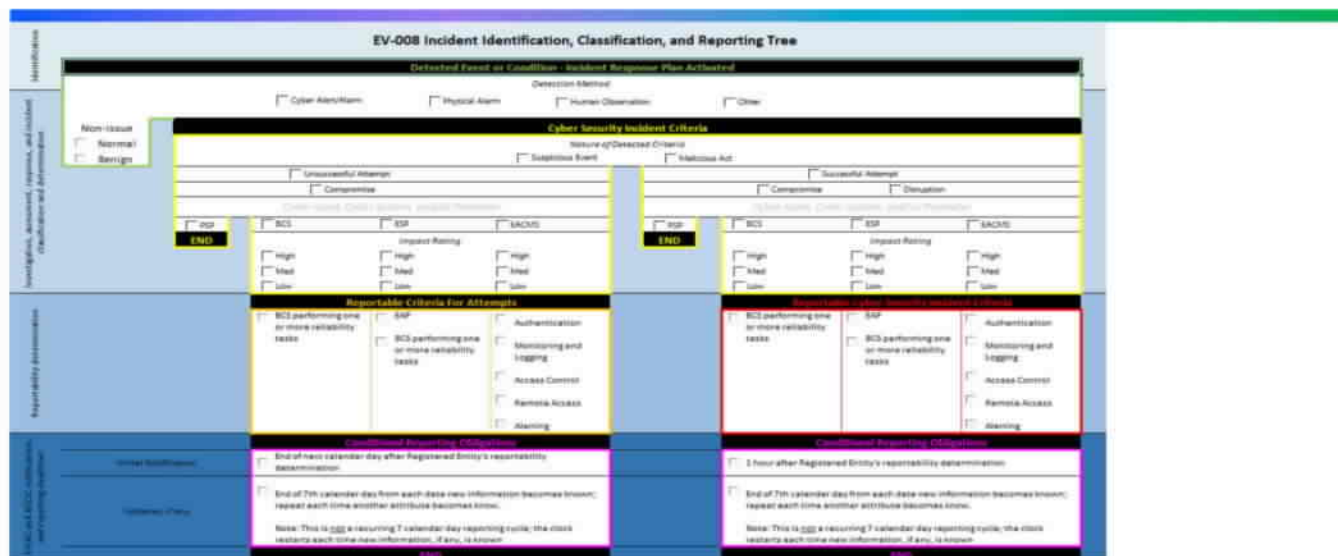
Responsibilities

The Core Incident Response Team (Core IRT) is made up of a Team Lead, a Technical Lead, and and Infrastructure Security Lead. These members have been selected based on technical experience, overall work experience, and/or positions in the company:

Team Lead –This employee is in charge of incident response. The Team Lead performs a variety of tasks, including acting as a liaison with upper management and other teams and organizations and ensuring the team has the necessary personnel, resources, and skills.

Technical Lead – Has strong technical skills and incident response experience and has oversight and responsibility for the quality of technical work that the entire incident response team undertakes. The Technical Lead is responsible for reporting incidents identified upward and escalating the incident among team members.

Infrastructure Security Lead – Participates in the analysis, containment, remediation, reporting and documenting information related to a security incident as required. They work with the Team Lead and Technical Lead to help coordinate efforts to resolve and communicate information about the security incident. This group will also act as a liaison between the Core IRT Team, Physical Security, Facilities Management, and the IT Support Staff. This role is fulfilled by an AES US Infrastructure Security team member assigned to the incident.

Additional Roles/Members – Individuals in other departments may be contacted and/or utilized on a case-by-case basis if their area of expertise is required during the event analysis or incident resolution phases:

Security and Facilities Management – Needs to be informed of breaches in physical security, threats, and stolen assets. Facilitate all communications with local authorities or FBI regarding physical or cyber security incidents.

Telecommunications – Is aware of the current capabilities, procedures and the point of contacts for working with data and voice telecommunications including microwave and radio.

IT Support Staff – Includes system administrators, network administrators, and software developers who have technical skills to assist during an incident and have the best understanding of the technology they work with daily. This includes personnel responsible for support of networking equipment and firewalls that may be needed to contain an incident.

Legal Department – should review the policy and procedure to ensure compliance with laws. May seek Federal guidance from the general counsel or legal department if there is a reason to believe an incident may have legal ramifications, including evidence collection, prosecution of a suspect, or a lawsuit.

Public Affairs and Media Relations – may be required if public notification is required or to control risk associated with an incident that can harm the image or reputation of the company.

Human Resource Department – needs to be involved when an employee is the apparent target of an incident or is suspected of causing the incident.

Scribe - will be responsible for recording meeting minutes and assisting in the development of the incident timeline and lessons learned.

Prevention

The local ICS Support Staff and AES US Infrastructure Security have implemented layered security defenses to help prevent incidents by ensuring that systems, networks, and applications are sufficiently secure using one or more of the following mitigating security techniques:
• Firewalls
• Physical and logical access controls
• Vulnerability scanning and assessments
• Configuration Documentation (ports, services, software, patch level)
• Installed Antivirus software
• Change Management/Patch Management
• Disaster Recovery Plan
• Incident Response Plan
• Intrusion Detection System (IDS)/Intrusion Prevention System (IPS)
• Logging & Monitoring, Security Information and Event Manager (SIEM)
• Training
• Installed Change Detection
• No Wireless Access Points (WAP) and ad-hoc connection points are allowed within the Secured CIP Network perimeter
• Incoming communication protocols for the purpose of email, chat or streaming audio/visual applications are prohibited
• Network Monitoring

Preliminary Analysis

Local ICS Personnel and the Infrastructure Security Lead perform preliminary analysis to identify what has been or is being impacted by the incident. Local ICS Personnel and/or the Infrastructure Security Lead perform one or more of the following actions to ensure that the incident analysis is accurate and effective:
• Gather metrics of normal network and server activity for comparison against suspected abnormal behavior.
• Use SIEM and logging software for event tracking
• Perform event correlation using physical and logical assets
• Maintain and use a knowledge base
• Run packet sniffer software to collect network activity data
• Collaborate with others where appropriate

In-depth Analysis and Investigation

In-depth analysis and investigation is conducted by the Technical Team Lead, the Infrastructure Security Lead, their delegates, and/or support personnel to identify if anything was compromised using logs and utilizing open sources for mitigation and remediation. During this analysis, the team collects evidence which is later used for the Eradication and Recovery section of this procedure. Evidence collected is used to examine the current issue at hand in addition to other vulnerabilities which could prove to be present in the system and in need of remedy.
4.9 Containment
The incident response Team Lead with the support of the Technical and Infrastructure Security Leads, takes ownership of the incident containment process. The containment plan includes isolating the incident to prevent spreading to other BES Critical Systems.
a. Several factors are considered in determining the containment requirements:

i. Potential Damage
ii. Need for evidence preservation
iii. Service availability
iv. Time and resources needed to implement the strategy
v. Effectiveness of the strategy (e.g., partial vs. full containment)
vi. Duration of the solution and priority

Threat	Method of Containment
Denial of Service Attack	Disconnect firewall from external network
Malicious Code with Unknown Fix (Virus, Worm, Trojan)	As appropriate: • Stop services. • Disconnect/power down affected assets from network. • Sanitize each asset while disconnected from network in detail. • Maintain network/IDS monitoring until all events have stopped.
Malicious Code with Known Fix/Workaround (Virus, Worm, Trojan)	Isolated by antivirus quarantine
Admin/User Access Compromise	Change Passwords, notify security
Unauthorized data modification	Determine causal user, restore compromised data from known good source
Social Engineering	Notify security, change passwords/access codes as needed
Unauthorized physical access into security perimeter	Notify security
Expressed Threats against Cyber Assets	As appropriate: • If the threat is physical, notify security. • If the threat is cyber and from outside the ESP, disconnect the firewall and maintain network monitoring/IDS monitoring.

Eradication and Recovery

Once an incident has been contained, all identified vulnerabilities exploited need to be remediated and mitigated. Eradication and recovery is necessary to eliminate components of the incident, such as deleting malicious code and disabling breached user accounts. Recovery may involve restoring systems, rebuilding systems, replacing compromised files, installing patches, changing passwords and tightening network perimeter security. Eradication and recovery steps are performed by ICS Support, IT personnel, and/or Infrastructure Security Personnel.

Communication Plan

Evidence gathering and handling, as well as identifying the attacker, is handled by the Technical and Infrastructure Security Lead team members with the support of any additional Incident Response Team members deemed necessary, who are educated in security practices or forensics. If forensic expertise or court experience is needed the following external agencies or companies are contacted.

Name	Contact Information	Site
FBI	Notify through Infrastructure Security	
Police/Sheriff (State and or Local)	Notify through Infrastructure Security	
Tech Evidence	937-673-6085	www.techevidence.com
Binary Intelligence Technology	513-932-8343	www.computerexaminers.com
Appropriate Agencies (DoE, NERC, Regional Entity, Reliability Coordinator, etc.)	Maintained by Team Lead	DOE FORM 0E-417 or EOP-004 Form

Incident Documentation

The IRT Infrastructure Security Lead records all of the information related to the incident on the EV-008 R1 Incident Response Log. The Infrastructure Security Lead reviews the initial incident information and status and notifies the incident response Team Lead. If required, the Team Lead will report to E-ISAC. Information collected and documented on the EV-008 R1 Incident Response Log includes:
• Reporting individual or entity
• Date and location of incident
• Brief description of the incident
• Affected Assets/Systems
• Status of the incident
• Expected duration
• Cause of Incident (if known)
• Actions taken
Law enforcement involvement
• Comments
• Resolution methodologies used
• Lessons Learned
• Date the incident was closed

Cyber Security Incident Response Plan Implementation and Testing
The Incident Response Plan for Low Impact BES Cyber Systems is tested at least once every 36-calendar months. One of the following methods is used for testing the Incident Response Plan(s):

1. **Paper Drill/Operational Exercise:** A paper drill or operational exercise is scheduled with local personnel. The ISCT creates a drill/exercise used to test all aspects of the Cyber Security Incident Response Plan.
2. **Actual Cyber Security Incident Response:** An actual security incident response can be considered as a company's "drill" for the 36-calendar month time period.

Documentation Steps

During an exercise or actual event, the following steps are used to document and improve, if necessary, the Cyber Security Incident Response Plan:
a. The EV-008 R1 Incident Response Log is used to record the incident parameters and response activities.
b. Notes, communications and documentation related to the incident are summarized into the EV-008 R1 Incident Response Log at the close of the incident.
c. An After-Action Review (AAR) is performed within 90 calendar days of the incident or exercise to determine if any lessons learned during the incident should be added to the Incident Response Plan.
d. Any changes to the Incident Response Plan based on the AAR are made within 180 calendar days of the exercise or incident. The revision history matrix for the plan is updated to detail the changes made.
e. The IRT, Infrastructure Security personnel, local facility team members (see EV-008 Local Incident Response Teams) and other individuals involved in the incident response or exercise are notified of changes to the Cyber Security Incident Response Plan.

Annex (I) – Physical Security PUCT 25.53 (C)(c)(1)(H) and PUCT 25.53 (C)(c)(2)(G)

In the case of a physical security breach:

- The General Manager (GM) must be informed of breaches in physical security, threats, and stolen assets. The GM or designee will facilitate all communications with local authorities or FBI regarding physical or cyber security incidents.

- ISOC or ROCC will notify local law enforcement of alarms indicating a physical security breach.

- If a breach occurs or is found during regular business hours, a Team Leader will notify local law enforcement of the breach.

- Site personnel observing security breaches will notify site leadership and call 911 if instructed to do so. Site personnel working outside normal business hours will notify local law enforcement if the breach is in progress. If breach is not in progress, leadership will be notified, and the leader will contact law enforcement.

- If perpetrators are still present, they will not be accosted or apprehended by site personnel, their location and activities will be reported to law enforcement

- Once perpetrators are apprehended by law enforcement, or if there are no perpetrators present, a Team Leader and the BOP Team leader will go to the site of the breach and assess any damage to or theft of company assets and determine the effect on production.

- The responding site leader will document the incident in an Incident Report on Site Docs, and include:
  - Reporting individual or entity
  - Date and location of incident
  - Brief description of the incident
  - Affected Assets/Systems
  - Current status of the incident
  - Expected duration
  - Cause of Incident (if known)
  - Actions taken
  - Law enforcement involvement
  - Comments
  - Resolution methodologies used
  - Lessons Learned
  - Date the incident was closed

- Findings will be reported to the ROCC and AIE. Team Leaders, EHS, NERC will make an action plan to address compromised assets and restore them to full function. Evidence gathering and handling, as well as identifying the intruder, is handled by the Technical and Infrastructure Security team members with the support of any additional Incident Response Team members deemed necessary, who are educated in security practices or forensics. If forensic expertise or court experience is needed the following external agencies or companies are contacted.

Name	Contact Information	Site
FBI	Notify through Infrastructure Security	
Police/Sheriff (State and or Local)	Notify through Infrastructure Security	
Tech Evidence	937-673-6085	www.techevidence.com
Binary Intelligence Technology	513-932-8343	www.computerexaminers.com
Appropriate Agencies (DoE, NERC, Regional Entity, Reliability Coordinator, etc.)	Maintained by Team Lead	DOE FORM 0E-417 or EOP-004 Form

Annex (L) Restoration of Service, Business Continuity Plan (BCP) PUCT 25.53 (C)(e)(2)(C)

The purpose of Buffalo Gap Business Continuity Plan (BCP) is to assist employees and management in making quality decisions during times of crisis. This plan contains guidance in determining appropriate actions to take after property loss from the occurrence of emergency incidents. The plan will assist facility management in ensuring the survivability of the various business assets at Buffalo Gap AES Wind Generation, in the event of an incident.

Plan Goals and Objectives

Provide employees with procedures to follow for effective and safe actions after an emergency.

Team Composition:

Buffalo Gap 1,2,3	Business Continuity Manager	*Vince Lesko or designee*
	Department Team Leaders	*Dave Barnett, Lolly Bradbury, Justin Calcote, Jeff Ludlum*
	Response Coordinators	*Dave Barnett, Lolly Bradbury, Justin Calcote, Jeff Ludlum, Jeremy Kingston*
	Safety and Physical Security Committee	*Jeremy Kingston and designees*

Business Continuity Manager

The Business Continuity Manager (BCM) is responsible for managing all pre-disruption activities including working with the BCM Team to set readiness expectations and annual planning activities for the organization.

During a disruption, the BC Manger orchestrates response and recovery activities and manages communication and action plan recommendations with the BCM Team.

Post disruption, the BC Manager orchestrates a return to normal activities including facilitating post disruption meetings to document lessons learned to ensure the organization is returned to a ready state.

Department Team Leaders

Department Team Leaders (DTLs) fill a similar role as the BC Manager, however within their assigned department. They ensure that a Department Response Team is assigned and that plans are created and maintained based on the standards included in this document. DTLs sometimes have dual roles to play as both a Department Team Leader and on the BCM team as an advisor providing planning activity recommendations from their department's perspective.

Response Coordinators

Response Coordinators (RCs) are individuals assigned to a Department Response Team who are responsible for creating and executing response, recovery, and business (or more specifically department) continuity for their assigned core functions.

Safety and Physical Security Committee

A Safety and Physical Security Committee must be established so that published safety and security procedures for building emergencies are kept current and relevant. Regular drills must be performed, and results documented.

Succession Planning

The Department Team Leaders will succeed the Business Continuity Manager and automatically take his or her responsibilities if not available after an emergency. The Lead Technicians will succeed the Department Team Leaders and automatically take their responsibilities if not available.

Business Level Strategies

Critical Functions that would shut down one or more wind farms:

- 138kV Transmission line out of service to Bluff Creek (all wind farms)
- Communications Rooms out of service O&M Building (all wind farms)
- Substation or Stations out of service (one substation per wind farm)
- Telecommunications 1. Four Wire (BG2) 2. Frame Relay (BG1 & BG3)
- SCADA out of service cannot perform curtailment (one per wind farm)

Strategies for Recovery Activities by Critical Function:

138kV T-Line: Mobilize contractors on call list to repair. It may take days or months depending on the severity of damage.

    a)   Day 1 Jeff Ludlum & team members notify the ROCDC, and AIE if instructed & assess extent of damage

    b)   Day 1 Vince Lesko or Team Leaders notify AES Management

    c)   Day 1 Jeff Ludlum & BG Buyer notify contractors and determine availability

    d)   Day 2 Jeff Ludlum & team define scope of work, estimated time to repair

    e)   Depending on contractor availability, mobilize to complete work

    f)   Upon completion Jeff Ludlum notify AIE for energization authorization

Communications Rooms: Mobilize IT and contractors to reestablish communications with Power Purchaser (AIE). We estimate a maximum outage time of two (2) weeks.

    a)   Day 1 Jeff Ludlum notify AIE & assess extent of damage

    b)   Day 1 Vince Lesko or Team Leaders notify AES Management

    c)   Day 1 USSBU IT & BG Buyer notify contractors and determine availability

    d)   Day 2 USSBU IT & team define scope of work, estimated time to repair or replace

    e)   Depending on contractor availability, mobilize to complete work

    f)   Purchase communications equipment (readily available) and download software that is backed up offsite on virtual machines.

g) Upon completion Jeff Ludlum notify AIE for energization authorization

Substations: Depending on severity of damage mobilize contractors and suppliers to repair. It may take days or months depending on the severity.

    a) Day 1 Jeff Ludlum & team members notify AIE & assess extent of damage

    b) Day 1 Vince Lesko or Team Leaders notify AES Management

    c) Day 1 Jeff Ludlum & BG Buyer notify contractors and determine availability

    d) Day 2 Jeff Ludlum & team define scope of work, estimated time to repair

    e) Depending on contractor availability, mobilize to complete work

    f) Upon completion Jeff Ludlum notify AIE for energization authorization

Telecommunications: Mobilize contractors and IT to repair or replace depending on severity (two scenarios Four Wire or Frame Relay outage). Estimate a maximum two (2) weeks outage.

    a) Day 1 Jeff Ludlum notify AIE of BG2 and Four Wire outage

    b) Day 1 Jeff Ludlum and OT assess damage and notify Taylor Telephone

    c) Day 1 Vince Lesko or Team Leaders notify AES Management

    d) Depending on Taylor Telephone availability, mobilize to complete work

    e) Upon completion Jeff Ludlum notify AIE for energization authorization

    f) Day 1 Jeff Ludlum notify AIE of BG1 & 3 outage due to Frame Relay damage

    g) Day 1 Jeff Ludlum and IT assess damage and notify contractors

    h) Day 1 Vince Lesko or Team Leaders notify AES Management

    i) Day 2 USSBU IT & team define scope of work, estimated time to repair or replace

    j) Depending on contractor availability, mobilize to complete work

    k) Upon completion Jeff Ludlum notify AIE for energization authorization

SCADA: Mobilize wind farm supplier to repair or replace. BG2 would be restored in a few days. BG 1 & BG3 estimated outage is one (1) week.

    a) Day 1 Jeff Ludlum notify AIE & assess extent of damage

    b) Day 1 Vince Lesko or Team Leaders notify AES Management

    c) Day 1 or 2 Vince Lesko and USSBU IT notifies GE, Siemens or Vestas (OEM) as applicable of outage and request support to restore SCADA (software download for Siemens and Vestas, GE software stored by AES)

    d) Depending on OEM availability, mobilize to complete work

    e) Upon completion Jeff Ludlum notify AIE for energization authorization

Recovery Time and Point Objectives

    Recovery times estimated in plan.

    Crisis Communication Strategy

Business Continuity Manager or alternates direct all media request and EHS Coordinator direct local emergency responders. Internal personnel notified by site wide text message.

Plan Activation

Severity Level 1 & 2

These scenarios are covered in Buffalo Gap's Emergency Action Plan. Communication and operations can be performed remotely by telephone and internet however if the site is inaccessible turbine repairs will not be possible until access is restored. The remote 24-hour Operations Center will notify the technicians and leadership by text or phone call per their standard procedures and will control the operations. Remote operations can also be managed by technicians from home if internet is available. Having 293 turbines on 24,000 acres it is unlikely that all turbines will be affected.

Severity Level 3

If the critical work location is destroyed permanently, assuming this is the office location once the communications rooms are rebuilt or restored operations could resume (see Critical Function 2 above). Alternative work location would be mobile units installed on site. This could be done in three (3) weeks. The likelihood of the entire site being destroyed has been determined to be a low probability due to the vast area and has not been included in our plan strategies. In the event of major damage to the facilities The AES Global Insurance Company and senior management will be notified for determination of next steps.

Severity Level 4

Our Wind IT people have determined that a cyber-attack on the Buffalo Gap control systems is highly unlikely due to isolation from outside networks and communications systems. Cyber-attacks targeting specific systems are generally known in advance. If applicable to Buffalo Gap systems, they could immediately be isolated from all outside users (OEMs).
Notification
In the event of an emergency or disruption the notification procedure and command control as outlined in Section II.3 of the Emergency Action Plan will be implemented.

Communication with the Team as defined in the Emergency Action Plan will be by mobile phone, email (AES or personal addresses), and radio if onsite or land lines if available. The remote 24-hour Operations Center will notify the technicians and leadership by text or phone call per their standard procedures:
During Normal Operating Hours
- Same as above.
- Employee Emergency Contact Information
- Updated 1/1/2019.
- Communication Methods
- Cell phones, email, site radios.

Administration Operation Strategies

Overview

- Site Management may operate from home if required. Support functions are remote from site.
- Alternate Work Location Strategy
- Alternate work locations will require some time to organize. As described above remote operations from the ROCC office will continue until the site is operational.
- Emergency Operating Center (EOC)
- A mobile unit may be brought in on a temporary basis.

Return-to-Normal Strategy

The Business Continuity Manager will manage restoration of normal operations.

Ongoing BCM Activities

Next – Future Goals and Objectives

Modify the BCM as required.

Change Control Management

The Business Continuity Manager oversees all revisions and updates to procedures and emergency action plans.

Plan Validation/Testing

This is a very small operation with few people. We have tested the notification procedure during weather events. Drills under the Emergency Action Plan that may include these scenarios.

Grid Ex exercises occur annually to test the functions of the EOP communication and response. Emergency scenarios are built and implemented during a test period, and all applicable respondents work through their roles in the real-time test. Results are recorded and actions plans are made to address any identified issues.

Plan Awareness Education

Any Updates or Changes to this Plan or the Emergency Action Plan will be communicated during Weekly site meeting, Annual or Quarterly Business Review meetings.

Critical Vendor Products and Services

Alternate suppliers have been identified for many of the plant's requirements. Contact information is included in Supplemental Information Section below.

Supplemental Information

AES Wind Generation – Buffalo Gap Emergency Contact List

Name	Title	Responsibility	Mobile Telephone Number	E-mail
Tracy Jarvis	Snr Mgr Plant Operations	BC Manager	325-725-6180	tracy.jarvis@aes.com
Vince Lesko	General Manager	BC Manager	760-660-6412	Vince.lesko@aes.com
Dave Barnett	BG1 Team Leader	DLT Secondary I/C	325-721-3509	dave.barnett@aes.com
Justin Calcote	BG3 Team Leader	DLT Secondary I/C	325-977-0620	justin.calcote@aes.com
Lolly Bradbury	BG2 Team Leader	DLT Secondary I/C	325-627-5939	lolly.bradbury@aes.com
Jeremy Kingston	EHS Coordinator	RC Primary I/C	325-219-2832	jeremy.kingston@aes.com
Jeff Ludlum	BOP Lead	Secondary I/C	325-266-3029	jeffery.ludlum@aes.com

Emergency Contacts

ABF	Jonathan Davila	325-754-4521	LTL expedite and heavy haul services
Abilene Rental	Customer Service	325-676-1500	Equipment Rental
Abilene Sales	service	325-673-7962	MRO Supplies
Leonard	service	800-685-7867	Water service
Water works	Jason Cory	325-338-0956	Water, Coffee, Sugar
Associated Contractors	DeWayne Key	325-672-7806	General Contractor
Blake Fullenwider Dodge	Service Dept.	325-893-1416	Vehicle Maintenance
Hudman Plumbing and Septic	Mike Hudman	325-338-8542	Plumbing/Septic
Crane Services	Cody Hethcoat	325-725-7533	Cranes
DXP	Michael Payne	325-672-5628	Tool, Rebuilds, MRO
Evans	Joel Dreistadt	325-236-1880	Parts for BG2 Turbines
FedEx	J.R. Foster	325-829-6071	Frt. Carrier
GE Joint Mailbox	energy.windpartscustomerfulfillment@aes.com		BG2 Turbine Parts
	Cheryl Collamer	518-385-8102 / cell 518-937-8994	

Techline	Nathan Chan	Office: 817-561-9900 Cell: 817-487-8799	BOP Parts
IT Wind	Rachel Taylor	760 329 6431 x 146	IT
McMaster-Carr	Customer Svc	404 346 7000	Tools, MRO
Miller Dirt Works	Miles Miller	325-669-9163	Road Work
Circle C	Josh Martin	325-201-6868 circlechaulingllc@yahoo.com	Road Work, Gates, Cattle Guards, etc.
Mobile Phone of Texas	Dave O'Conner	325-698-2337	Motorola Radios
MSC 1 888 800 3671	Ron Walls	817-888-0244	Tools, MRO Supplies
Northwest Crane	Brent Cooper	325-267-5389	Cranes
OIL FILTER RECYCLERS	Larry Bruns	217-971-6417	Recycling
Avetta	Colten Carter	385-207-2501	Contractor Management
Safety-Kleen	Brent Wideman	325-439-1970	Environmental Clean up
Siemens	Valerie Sanders	832-284-3503	BG Turbine Parts
Vestas	Rocky Duffey	roduf@vestas.com	BG1 Parts
WECS	Laramie Burress	325-721-6563	BG2 and 3 Parts (BOP parts as well)
West Texas Gas	Sales Dept.	325-677-6209	Propane
Gannett Fleming	Tony Zamberlan	636-787-0032 ext. 213 Cell: 636-236-1337	BOP Hi-Voltage engineering
Primary Utilities	Arthur Hernandez	325-575-1782 ahernandez@primaryus.com	Transmission Line Repair
Border States	Justin Jitter	325-439-0404 Jjetter@border-states.com	Pole line Equipment
HD Supply	Edwards, Keith [HDS] (Keith.Edwards@hdsupply.com) 806-747-3128		Pole line Equipment
USA Mobile Offices	Online		Mobile trailers
Air 2	Mark Camus	markcamus@air2.com 423-282-4822 Cell: 423-426-1218	Transmission line Repair (Helicopters)
Electric Power Systems	Jeff Haynes	225-907-7784 J.haynes@epsii.com	Substation testing and repair.
Buffalo Gap Instrumentation & Electrical	James Rose	325-513-6622 Jrose@bgie.net	BOP Supplier, Sub Station testing, underground cable testing and repair.

ABP	Phillip Arther	pharther@txol.net 254-629-1441 Cell: 254-631-1071	Fiber Optic communications testing and repair.
Keasler Associates	Terry Cook	terry@keasler.com cell: 512-632-1773 Office: 512-295-8199 Mail Office: 972-669-4000	Sourcing agency for electrical Equipment such as GSU's, Breakers, CCVT's, PT's, CT's, etc.

Annex (M) - Hazard Identification and Risk Assessment

EVENT	PROBAB ILITY	SEVERITY = (MAGNITUDE - MITIGATION)			PREPAR ED- NESS	INTERN AL RESPON SE	EXTERN AL RESPON SE	RISK
		HUMAN IMPACT	PROPER TY IMPACT	BUSINE SS IMPACT				
	Likelihood this will occur	Possibility of death or injury	Physical losses and damage	Interruptio n of services	Preplannin g	Time, effectivene ss, resources	Communit y/ Mutual Aid staff and supplies	Relative threat*
SCORE	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 - 100%
Tornado	2	1	3	3	1	2	2	44%
Severe Thunderstor m	3	1	2	2	1	1	1	44%
Snow Fall	1	1	1	1	2	2	2	17%
Blizzard	1	1	1	1	2	3	3	20%
Ice Storm	2	2	1	2	1	2	3	41%
Earthquake	1	1	1	1	3	3	3	22%
Heat/Humidit y	3	1	1	2	1	1	3	50%
Drought	2	0	1	1	3	3	3	41%
Flood, External	1	1	1	1	2	3	3	20%
Wild Fire	3	1	2	1	1	2	2	50%
Landslide	0	0	0	0	0	0	0	0%
Dam Inundation	0	0	0	0	0	0	0	0%
Subsidence	0	0	0	0	0	0	0	0%
Epidemic	1	1	0	1	3	3	3	20%
AVERAGE SCORE								0%
*Threat increases with percentage.								0%
	1.25	0.69	0.88	1.00	1.25	1.56	1.75	16%

EVENT	PROBA BILITY	HUMAN IMPACT	PROPER TY IMPACT	BUSINES S IMPACT	PREPAR ED-NESS	INTERNA L RESPON SE	EXTERN AL RESPON SE	RISK
	Likelihood this will occur	Possibility of death or injury	Physical losses and damage	Interruption of services	Preplannin g	Time, effectivene ss, resources	Community / Mutual Aid staff and supplies	Relative threat*
SCORE	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 - 100%
Electrical Failure	2	1	2	3	2	2	2	44%
Generator Failure	1	1	1	2	2	3	3	22%
Transportation Failure	1	0	0	1	3	3	3	19%
Fuel Shortage	1	0	1	1	3	3	3	20%
Communications Failure	2	0	1	2	2	2	3	37%
Information Systems Failure	1	0	1	1	2	2	2	15%
Fire, Internal	1	1	3	3	1	3	3	26%
Flood, Internal	1	1	1	1	3	3	3	22%
Hazmat Exposure, Internal	1	1	1	1	1	3	3	19%
Supply Shortage	2	0	0	2	2	3	3	37%
Structural Damage	1	0	1	1	2	3	3	19%
AVERAGE SCORE	0							0%
*Threat increases with percentage.								0%
								0%
								0%
								0%
								0%
								0%
								0%
	0.74	0.26	0.63	0.95	1.21	1.58	1.63	9%

EVENT	PROBAB ILITY	SEVERITY = (MAGNITUDE - MITIGATION)			PREPAR ED-NESS	INTERNA L RESPON SE	EXTERN AL RESPON SE	RISK
		HUMAN IMPACT	PROPE RTY IMPACT	BUSINES S IMPACT				
	Likelihood this will occur	Possibility of death or injury	Physical losses and damage	Interruption of services	Preplannin g	Time, effectivene ss, resources	Community / Mutual Aid staff and supplies	Relative threat*
SCORE	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 - 100%
Mass Casualty Incident (trauma)	1	1	1	1	1	3	3	19%
Mass Casualty Incident (medical/infectiou s)	1	1	1	1	1	3	3	19%
Terrorism, Biological	1	1	1	1	1	3	3	19%
VIP Situation	1	1	1	1	1	3	3	19%
Hostage Situation	1	1	1	1	1	3	3	19%
Civil Disturbance	1	0	1	1	3	3	3	20%
Missing Resident	0	0	0	0	0	0	0	0%
Bomb Threat	1	1	1	2	2	3	3	22%
AVERAGE								0%
*Threat increases with percentage.								0%
								0%
	0.70	0.60	0.70	0.80	1.00	2.10	2.10	11%

EVENT	PROBA BILITY	HUMAN IMPACT	PROPER TY IMPACT	BUSINE SS IMPACT	PREPAR ED- NESS	INTERN AL RESPON SE	EXTERNA L RESPONS E	RISK
	Likelihood this will occur	Possibilit y of death or injury	Physical losses and damage	Interruptio n of services	Preplannin g	Time, effectivene ss, resources	Community/ Mutual Aid staff and supplies	Relative threat*
SCORE	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = Low 2 = Moderate 3 = High	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 = N/A 1 = High 2 = Moderate 3 = Low or none	0 - 100%
Mass Casualty Hazmat Incident *(From historic events at your facility with >= 5 victims)*	1	1	1	1	1	3	3	19%
Small Casualty Hazmat Incident *(From historic events at your facility with < 5 victims)*	1	1	1	1	1	3	3	19%
Chemical Exposure	1	1	1	1	1	3	3	19%
Terrorism, Chemical	1	1	1	1	3	3	3	22%
Radiologic Exposure, External	0	0	0	0	3	3	3	0%
Terrorism, Radiologic	0	0	0	0	3	0	0	0%
AVERAGE								0%
								0%
Threat increases with percentage.								0%
	0.44	0.44	0.44	0.44	1.33	1.67	1.67	5%