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Electric	REPORTING Procedure	Version No.	5.6
Congoany		Effective Date	12/22/2021
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Cyber Security Incident Response and Reporting		Document C	lassification
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### **RPM-011 - Cyber Security Incident Response and Reporting Plan**



### **Attachment 5: Cyber Security RPM-011**

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Attachment 6: Cyber Security Incident Reporting and Response

The Lastrice		Document No.	Page 1 of 42 PLN-08-01-01
Company	PLAN	Version No.	2.1
El Paso Electric		Effective Date	10/13/2021
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#### Purpose

To establish a Cyber Security Incident Reporting and Response Plan to mitigate the risk to the reliable operation of the BES as the result of a Cyber Security Incident by specifying incident response requirements in compliance with NERC CIP Standards CIP-003-8 and CIP-008-6.

#### Scope

#### Personnel, Events and Assets

This plan applies to all El Paso Electric employees, contractors, vendors; to all Cyber Security Incidents and Reportable Cyber Security Incidents (both training and actual execution during incidents); and to EPE's BES Cyber Systems categorized as a High and Medium, their associated BES Cyber Assets (BCA), and their associated Electronic Access Control and Monitoring Systems (EACMS) and EPE's Low Impact BES Cyber Systems. All other Cyber Assets are outside the scope of this plan.

## Attachment 6: Cyber Security Incident Reporting and Response

PAGES 2-42 HAVE BEEN REDACTED



# CYBERSECURITY INCIDENT RESPONSE PLAN



Version 1.2

### Approval

The undersigned individuals, approve this El Paso Electric Company Cybersecurity Incident Response Plan.

	_		
David C Hawkins, VP Strategy & Sustainability	-	Date	
	-		
Cynthia Henry, VP & General Counsel	-	Date	
	-		
	-		
Lourdes Tapia, SR Dir. Tech & Cybersecurity		Date	

### Document History

The most recent document history/version and list of modifications are documented in the table below:

Version	Date	Change Descriptions	Reviewed By
1.2		March 2022 Contacts Updates	E. Bernal
1.1		Sept 2021 Board Language Update	E. Bernal

### Maintaining this Document

This document will be subject to both planned reviews and continuous improvement activities. The document will be reviewed annually by the Information Technology Department. Any major revisions to the Cybersecurity Incident Response Plan (the CIRP) will be promptly communicated to the impacted business units.

### Relationship to Other Plans

In the event of multiple incidents or a complex large-scale single incident, corporate support may be required to provide overall coordination of area response efforts. Depending on the event, other EPE plans may be activated in conjunction with this CSIRP. These may include:

- Crisis Communication Plan
- Crisis Management Plan
- Incident Management Plan
- NERC CIP Cybersecurity Incident Reporting and Response Planning

• System Operations Reporting Procedures Manual

### Key Terms and Acronyms

Term (Acronym)	Definition
Cybersecurity Incident Response Plan (CSIRP)	The plan that provides guidelines to identify, classify, respond to and report a cybersecurity incident.
Cybersecurity Incident Response Team (CSIRT)	CSIRT consists of all key areas of the organization that will assist in executing the CSIRP.
Cybersecurity Incident Response Team Manager (CSIRTM)	The individual responsible for coordinating the Cybersecurity First Responders incident response efforts to obtain restoration activities.
Cybersecurity First Responders (CFRs)	CFRs consists of IT Operations, Infrastructure, Applications, Project Manager, Information Security Consultants, and Manager – Information Security.
Strike Team	The Strike Team consists The individuals listedon Appendix F.
Incident Commander (IC)	The individual responsible for managing a security incident and incident response.
Executive Leadership Team (ELT)	The President and Chief Executive Officer and those that report directly to the President and Chief Executive Officer.

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### 1.0 Introduction

Cyber incidents are similar to other operational incidents. When a user determines or believes a cyber incident has occurred, their first responsibility is to initiate actions, procedures, or practices to stabilize any impact to business or operational systems that may jeopardize employee or public safety or may result in material consequences to employee or customer information or will result in interruption of business continuity. This Cybersecurity Incident Response Plan (CSIRP) is to be used as an enterprise-wide guide to facilitate a response immediately upon the initial incident detection.

#### 1.1 Purpose

The purpose of the CSIRP is to provide guidelines to identify, classify, respond to, and report a cybersecurity incident. In addition to providing a structured, systematic incident response process for all company information technology systems, including third party services and systems, it explains the response stages, including the standards to share information, the incident escalation procedure, and the guidelines for ensuring the preservation of evidence. This CSIRP defines areas of responsibility and establishes procedures for handling various cybersecurity incidents with the primary goal of minimizing the impact of cyber-attacks.

#### 1.2 Scope

This CSIRP applies to all El Paso Electric (EPE) employees, contractors, vendors, agents, and affiliates. It establishes a framework for coordination among individuals of multiple departments to complete the lifecycle of a cybersecurity incident within the corporate infrastructure. It also defines roles, responsibilities, and processes to be followed when a cybersecurity incident occurs.



## Attachment 7: Cyber Security Incident Response Plan

PAGES 7-46 HAVE BEEN REDACTED

El Paso Electric	Plan	Version No. Effective Date	9.0 5/27/2021
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#### Purpose

This Emergency Operations Plan has been developed and implemented by El Paso Electric (EPE) to mitigate operating emergencies. EPE's operating personnel shall be rigorously trained in its use. EPE System Operators with TOP and BA responsibilities are required to adhere to this document which pertains to Transmission and BA Emergency Operations. This plan shall be reviewed on an annual basis<sup>1</sup> and updated as needed. Copies of the updated plan shall be provided to the Reliability Coordinator and revised, if necessary, pursuant to any reliability risks identified by the Reliability Coordinator within the timeframe specified by the Reliability Coordinator.<sup>2</sup>

### Attachment 8: EPM-001

### PAGES 4-109 HAVE BEEN REDACTED

Ale C		Document No.	EPM - 003
Company	PLAN	Version No.	10.0
El Paso Electric		Effective Date	1/14/2022
EPE Syst	em Restoration Plan	Document Classification Internal Use	

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#### Purpose

The El Paso Electric (EPE) System Restoration Plan addresses the restoration process that EPE will follow should a separation occur between its system and the Western Interconnection. Once the extent and severity of the separation is determined, EPE will communicate and coordinate with the Reliability Coordinator its established plan to restart internal generation and add load in a planned process while maintaining frequency, voltage control, and reserves. The plan gives a method for restoring load in the EPE area to a state where the choice of the next Load to be restored is not driven by the need to control frequency or voltage. The **System Operator** with TOP responsibilities is responsible, in conjunction with System Operations Management, for activating the System Restoration Plan found in this document. The Plan has been coordinated with EPE's Reliability Coordinator – SPP West RC, WECC - PNM, TEP and TSGT; and SPP – SPS as necessary.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> NERC Reliability Standard EOP-005-3 R1

### Attachment 9: EPM-003

### PAGES 3-67 HAVE BEEN REDACTED

The Lastrice		Document No.	EPM-012
Company	Plan	Version No.	9.0
El Paso Electric		Effective Date	12/10/2021
Protection System UFLS Plan		Document Classification	
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#### Purpose

The purpose of the Under Frequency Load Shed (UFLS) plan is to provide the **EPE System Operator** with underfrequency relay settings that could affect system operations during abnormal frequency excursions. This document applies to **EPE System Control personnel**.

### Attachment 10: EPM-012

### PAGES 2-16 HAVE BEEN REDACTED

The Lastria		Document No.	EPM-013
Company	PLAN	Version No.	9.0
El Paso Electric		Effective Date	12/10/2021
EPM-013 – Protection System - UVLS Plan		Document Classification	
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#### Purpose

The purpose of the Under Voltage Load Shed (UVLS) program is to provide the **EPE System Operator** with under voltage relay settings which could impact system operations under abnormal voltage conditions.

EPE has installed under-voltage relays as a part of the program to prevent voltage instability during system contingencies. The tables below contain the UVLS Plan by Trigger Settings/Time Delay and Substation.

### Attachment 11: EPM-013

### PAGES 2-6 HAVE BEEN REDACTED

# Emergency Procedures Manual



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Flectric	OPERATING	Documen Inte	t Classification rnal Use
Company	PROCEDURE	Version No.	8.4
El Paso Electric		Effective Date	1/9/2020

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# EPM-001 – Emergency Operations

## Purpose

This Emergency Operations Plan has been developed and implemented by El Paso Electric (EPE) to mitigate operating emergencies. EPE's operating personnel shall be rigorously trained in its use. EPE System Operators are recognized as both TOP and BA entities and are required to adhere to this document which pertains to Transmission and BA Emergency Operations. This plan shall be reviewed and updated on an annual basis at a minimum. Copies of the updated plan shall be provided to the Reliability Coordinator and revised, if necessary, pursuant to any reliability risks identified by the Reliability Coordinator within the timeframe specified by the Reliability Coordinator (EOP-011-1, R1, R2 and R4).



# Attachment 12: Emergency Procedures Manual

# PAGES 9-245 HAVE BEEN REDACTED

# Attachment 13

EL PASO ELECTRIC			Fire Protection Design Criterion		Doc. No: DC-012
Department:		Engineering		Function:	Construction
Issued By:				Date:	12-30-2011
Revision:	#00				

### 1.0 PURPOSE and SCOPE

This document defines the El Paso Electric (EPE) standards for fire safety, system reliability, the potential financial effect of major damage or loss of company assets as a direct or indirect consequence of a fire, as well as maintenance and operation of the equipment in conventional air insulated substations.

### 1.1 Requirements

These design criteria provide guidance for fire protection designs (prevention, detection, and suppression) for outdoor substations. The proper assessment of the hazards involved with the new, existing, or planned substation and the choice of the most appropriate fire protection are the best ways to guarantee that the reliability of the power supply is protected from fire.

### 1.2 Application

All EPE substations shall be designed with the proper considerations given to fire safety, system reliability, and the potential economic impact from major damage or loss of EPE equipment from fire. These criteria are provided to achieve the following:

- Minimize the risks of fire exposure to EPE personnel, fire department personnel, and the public
- Minimize fire related system outages and the negative impacts on customer service
- Minimize fire related damage to equipment and the related cost of cleanup, replacement, etc.,
- Comply with applicable federal, state, local laws, and codes

This Design Criterion is not intended for use retroactively and shall be used only for new or expanded substation installations.

### 2.0 ACRONYMS and TERMS

### 2.1 General

There are many technical terms used to describe the substation/switching station facility. The reader is referred to the IEEE *Standard Dictionary of Electrical and Electronics Terms* IEEE Std. 100-2000. Common acronyms and terms used in this document are defined and listed below.

### 2.2 Acronyms

IEEE: Institute of Electrical and Electronics Engineers

**NEMA:** National Electrical Manufacturers Association

NFPA: National Fire Protection Association

**OSHA:** Occupational Safety and Health Administration

**SPCC:** Spill Prevention Control and Countermeasures

#### 2.3 Terms

**Oil-filled Equipment:** equipment containing mineral or other combustible oil

**Shall:** Definition - the principle must be adhered to. Only in extraordinary situations should a deviation be considered. If a deviation is considered, it must be fully evaluated (risks, costs, impact on other departments, long term effect, etc.) and must be discussed with affected department stakeholders.

Concurrence of all stakeholders is required before adopting the deviation. The evaluation and concurrence must be documented and retained in a long-term (project) file system.

**Should:** Definition - adherence to the principle is strongly recommended, but is not mandatory. Another approach can be used if it is determined to provide greater overall benefits than drawbacks.

Drawbacks include consideration of non-standard designs and the risk for operating error, maintenance knowledge, spare parts, additional documentation, etc. The determination rests with EPE's PM/PE.

**Substation:** an area or group of equipment containing switches, circuit breakers, buses, and transformers for switching power circuits and to transform power from one voltage to another or from one system to another\*

**Unattended Substation:** operating personnel are only present in the substation on an intermittent basis.

\* From the IEEE Standard Dictionary of Electrical and Electronics Terms

#### 3.0 GENERAL INFORMATION

Traditionally the risk of fires in substations has been, but the possible impacts of a fire can be catastrophic. They severely impact the customer's power supply and EPE's revenue and assets. Fires also create a hazard to EPE's personnel, emergency responders, and the general public.

The recognition of fire hazards, their risks, and the appropriate fire protection mitigation measures are some of the key considerations for the design and operation of substations.

Fire protection methods including barrier walls, physical separation, and sprinkler systems should be weighed against the safety concerns and the cost of fire insurance should be considered in evaluating all appropriate designs.

#### 4.0 REFERENCES

All substations are built to both industry and EPE standards. As standards are developed or modified, they shall be listed as a reference to engineering personnel.

Title

Title

# FIRE PROTECTION

## 4.1 Related EPE Design Criteria

The following design criteria contain information that may be related:

Document	Title
DC-001	Introduction
DC-002	General Arrangements
DC-008	Ambient and Electrical Service Conditions
DC-010	Signage
DC-017	Control Buildings
DC-031	Drawing Standards
DC-033	Quality Control and Quality Assurance Program
DC-037	Spill Prevention Containment and Countermeasures (SPCC)

## 4.2 EPE Standards

### Document

EPE Manual	Safety
CS-002	Installation of Conduits
CS-011	Site Preparation
CS-018	Station Equipment
CS-019	Control Building

## 4.3 Industry Standards

### Document

IEEE Std. C2	National Electrical Safety Code
IEEE 979	Guide for Substation Fire Protection
NFPA 10	Portable Fire Extinguishers
NFPA 72	National Fire Alarm Code
NFPA 251	Standard Methods of Tests of Fire Endurance Of Building Construction and Materials
NFPA 850	Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations
NFPA 1142	Standard on Water Supplies for Suburban and Rural Fire Fighting

# FIRE PROTECTION

### 5.0 DESIGN CRITERIA

One of the key steps in the design of new substations and the assessment of existing substations is to identify conditions that are fire hazards. Once the fire hazards of a planned or existing substation are identified, then fire protection measures can be incorporated to eliminate or lessen the fire hazard.

There are a wide range of types and causes of the fires that can occur in substations. The types of fires depend on the equipment and systems used in the stations. Fires involving dc valves, outdoor or indoor oil-insulated equipment, oil-insulated cable, hydrogen-cooled synchronous condensers, or PCB-insulated equipment are usually well documented, and these types of equipment are easily recognized as a fire hazard. There are a number of other substation-specific types of fires that are not as well documented.

All work shall be done in accordance with EPE's Design Criteria DC-033, *Quality Control and Quality Assurance Program.* 

Refer to EPE's Design Criteria DC-008, *Ambient and Electrical Service Conditions* for specific details.

All detailed drawings shall be in accordance with EPE's standards. Refer to DC-031, *Drawing Standards* for more details.

#### 5.1 Switchyard Hazards

Some of the specific components encountered in substation switchyards that are fire hazards are:

- Oil-insulated transformers and circuit breakers
- Oil-insulated potheads
- Vegetation
- Combustible service building
- Storage of pesticides or dangerous goods
- Storage warehouses
- Standby generator fuels and storage

The failure of some of the critical components such as transformers and breakers can directly result in losses of revenue or assets.

Other switchyard components could create a fire exposure hazard to critical operational components (i.e., combustible service buildings located close to bus support structures or transmission lines).

In situations where this separation is not feasible, EPE will consider alternatives (e.g., a two (2) hour firewall). If a firewall is determined to be the best alternative available, the configuration of the firewall shall be in accordance with the recommendations in NFPA 850, *Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations*.

# FIRE PROTECTION

### 5.2 Yard Design

Substation sites should be designed with the appropriate placement of slopes, valleys, berms, basins, etc., to drain and direct spilled oil to a containment basin. They shall also minimize and contain potential environmental impact onsite and away from receptor areas, as well as away from critical equipment and the control building.

To minimize the potential damage from burning oil, the drainage/containment basin layout shall be designed with two considerations:

- Maximize the rate at which the oil drains away for the affected equipment
- Minimize exposure to adjacent equipment by directing the flow of oil away from buildings, station entrances/exits, fire hydrants and extinguishers, and equipment such as transformers and circuit breakers

Oil-filled equipment and spill containment basins shall be located so that the potential fire exposure to third-party adjacent buildings is minimized. This can be accomplished by maintaining a minimum separation to the exposed structure as shown in Table 5.1.

### 5.2.1 Spill Prevention, Control, and Countermeasures (SPCC)

Stations with SPCC containment berms are designed to contain oil spills and prevent the spilled oil from leaving the station. See EPE Design Criterion 037, *Spill Prevention Containment and Countermeasures (SPCC)* for more details. Secondary containment protection berm configurations are:

- Containment berms around the inside perimeter of the fence
- Containment berms around a single piece of equipment
- Containment berms around multiple pieces of equipment, internally subdivided
- Containment berms around multiple pieces of equipment

Berms shall be constructed of non-combustible material.

Additionally, the floor of the secondary containment should be designed to prevent allow any standing water. The surface shall be designed to drain gently away from the electrical equipment so as to safeguard against potential electrical hazards associated with standing water.

It is recommended that drain lines be installed with manual valving. The valving shall be capable of being manually opened or closed during stormwater rain events. EPE maintenance personnel shall release accumulated stormwater that is not contaminated with any visible oil (dielectric) sheen onto the surrounding graveled area outside of the berm.

In addition to the construction and design of secondary containment situated around the electrical equipment, the surrounding area lying outside of the containment that houses the electrical equipment should be equipped with a gravel bed or chipseal to minimize the migration of contaminants resulting from spilled or leaking dielectric fluid into sub soils and spreading further. This best management practice will also reduce or eliminate electrical and fire hazards.

### **5.2.2 Equipment Separation and Firewalls**

Major equipment containing oils shall be separated from other major equipment by a clear space. This space shall be defined as the distance between the outer edges of two pieces of equipment, including any oil-filled appurtenance.

EPE's standard clear spaces distances are:

Table 5.1 – Minimum	n Clear Space Betweer	Oil-filled Equipment a	nd To Structures
---------------------	-----------------------	------------------------	------------------

Oil Quantity	Equipment	Combustible Building
Less than 500 Gallons	10'	10'
500 to 5,000 Gallons	25'	25'
Greater than 5,000 Gallons	50'	50'

In all cases, effort should be made to arrange equipment to meet the minimum clear space distances. Where the minimum separation listed in Table 5.1 is not feasible due to site constraints, the EPE Engineer shall be consulted. If this installation is determined to be critical to the reliability of the substation a firewall will be considered.

The firewall shall be a non-combustible, two (2) hour rated firewall per NFPA 251, *Standard Methods of Tests of Fire Endurance of Building Construction and Materials* shall be provided between the oil-filled equipment and the adjacent equipment. The configuration of the firewall shall be in accordance with the recommendations in NFPA 850, *Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations.* 

Firewalls shall be designed with appropriate considerations of the following issues:

- Seismic and wind loading requirements
- Space requirements for the maintenance of equipment (removable fire barriers are an acceptable option)
- Space requirements to allow adequate air circulation for cooling to prevent derating of the equipment
- Grounding for personnel safety

It is recognized that there are situations where equipment separation and/or firewalls between equipment may be extremely difficult or costly. An assessment of these specific situations must be performed and documented.

A decision to not increase separation or provide a wall is primarily a business risk decision, which will be made by the EPE Engineer in consultation with others.

### 5.2.3 Underground Facilities

Pull boxes and underground conduits should be arranged to prevent the intrusion of spilled oil, which may propagate damage to control wires and equipment in the control building.

# FIRE PROTECTION

This can be accomplished by grading, curbing, relocation to areas not exposed to potential spill, or by installing pull boxes with the top edge six (6") inches above the finished grade. When the pull boxes are above grade, caution should be taken to avoid tripping hazards and maintenance and operation impediments.

Pull boxes shall be provided non-combustible covers designed to minimize the entrance of spilled or sprayed combustible liquids.

Pull boxes shall be located at least ten (10') feet from any oil-filled equipment and shall be equipped with suitable fire stops to minimize the propagation of oil flow and fire.

All underground conduit entering buildings shall have approved fire-stop material installed to prevent oil and fire from entering the building.

### 5.2.4 Permanent Fire Suppression Equipment

Permanent fire suppression equipment such as fire hydrants, hose stations, or water tanks are not prescribe and generally not required. However, depending on the location of the substation, the EPE Engineer may determine other suppression means would be advantageous.

To minimize the potential impact on cost and schedule, the following should be considered:

- If the substation is in an urban area, a nearby public fire hydrant may be sufficient
- If there are no fire hydrants nearby and the EPE Engineer has determined it is necessary, a water supply based on NFPA 1142, *Standard on Water Supplies for Suburban and Rural Fire Fighting* can be proposed.

If a fire hydrant is required in the substation yard, it shall not be located in the path of combustible liquids that could flow across the yard.

Portable fire suppression equipment, such as fire extinguishers, are not required in the yard. This equipment is available on vehicles driven to the substation by maintenance and operations personnel.

### 5.3 Control Building

Control buildings shall be of non-combustible construction.

Control cables enter the building from a pull box located below grade and adjacent to the control building. The cable entrance shall be sealed with an approved fire stop material to maintain a two-hour fire rating.

The control building shall have two exit doors with each providing a separate path of travel from the building directly to the outside. Under no circumstances shall this door be blocked in any manner to prevent egress.

Signs identifying exits, prohibiting hazardous materials storage, prohibiting smoking, etc., shall be provided. See EPE Design Criterion 010, *Signage* for more details.

A control or relay building can include the following potential hazards:

• Exposed combustible construction

- Combustible finishes
- Emergency generators, shops, offices, and other noncritical facilities in the control buildings
- Batteries and charger systems
- Switchyard cable openings that have not been fire-stopped
- Adjacent oil-insulated transformers and breakers
- High-voltage equipment
- Dry transformers
- Workshops

A fire in any of these components could damage or destroy critical control or protection equipment. Damages could result in a long outage to customers as well as significant revenue losses.

### 5.3.1 Smoke Detection

Smoke detection systems are required in all new and remodeled buildings. The smoke detection system hardware and installation shall be in accordance with NFPA 72, *National Fire Alarm Code*.

The system shall be remotely monitored at EPE's control center.

### 5.3.2 Fire Suppression

In general, an automatic, fixed fire suppression system is not required. If the EPE Engineer determines a water based suppression system is required, it shall be of the pre-action type.

Carbon dioxide systems shall not be used due to life safety concerns.

Portable extinguishers shall be installed in all control buildings in accordance with NFPA 10, *Portable Fire Extinguishers*. The recommended extinguisher is Dry Chemical, 3-A, 40-B, C.

For stations with significant/critical protection and communications equipment, the installation of an additional  $CO_2$  or other clean agent fire extinguisher, which will not foul or prevent equipment from operating, may be considered.

### 5.3.3 Battery Area

The batteries shall be placed in an area separated from the main room of the control building by a masonry block wall. The wall is not required to run from floor to ceiling. Also, it is not required that access to the battery area be sealed.

Ventilation for this area is provided for by a thermostatically controlled exhaust fan.

This area shall have a recessed floor for spill containment. Its function is to prevent acid spills from flowing into the main room. The floor shall be coated with an acid proof paint

# FIRE PROTECTION

A minimum of one door is required, but two are preferable where practical. It is preferred that the second door open directly to the outside.

## 6.0 REVISION NOTES

# Attachment 14

# 1.1.1 Specific Fire Protection Plan Best Management Practices

EPE will be responsible for the following:

- Instructing all field personnel about emergency response for fire events.
- If a fire starts in the activity area, the maintenance crew will initiate fire suppression activities until relieved by appropriate fire authorities or until the fire exceeds immediate control.
- Immediately notifying the emergency fire contacts listed in Table 5 below. Every work site shall have at least one radio and/or cellular/satellite telephone capable of contacting emergency fire contacts.
- Conducting regular inspections of tools, equipment, and first-aid kits for completeness prior to entry onto the ROW.
- Including the fire prevention measures listed below in the job safety training.
- Ensuring that all workers are aware of the contents of this O&M plan.
- Monitoring current fire potential and issuing fire safety warnings to personnel.
- Keeping notification numbers readily available for all employees in case of fire and updating the emergency contact numbers in Table 5, as necessary.

#### **Table 5. Emergency Fire Contacts**

Contact	Phone
Emergency	Call 911
Wildfire reporting	Silver City Interagency Dispatch Center (575) 538-5371 Doña Ana, Luna, Grant, Hidalgo, Sierra, and Catron Counties
Erik Briske, BLM	Cell phone: (575) 649-9110
Aaron Millhench, BLM	Cell phone: (575) 343-2536

## 1.1.2 Fire Prevention Measures

The following fire prevention measures will be implemented by EPE during operation and maintenance activities:

- Operate all internal and external combustion engines (including off-highway vehicles, chainsaws, generators, heavy equipment, etc.) with a qualified spark arrester in good working order. Internal combustion engines (stationary or mobile) will comply with the following requirements:
  - Vehicles equipped with catalytic converters may represent potential fire hazards and will be parked on areas where vegetation is less than 8 inches tall.
  - In addition, chainsaws will comply with the following requirements: During the period of use, the operator will have one long-handled shovel that will be maintained in good working order.
- Refueling will be done in an area that has been cleared of flammable materials; power saws will be moved at least 10 feet from the place of refueling before starting. All fuels will be carried in an approved container based on fuel type.

- Construction equipment and vehicles will carry fire extinguishers. If a fire spreads beyond the suppression capability of workers with these tools, or it may be foreseeable to exceed the immediate capability of workers, all will cease fire suppression action and leave the area immediately via pre-identified escape routes.
- Operate all vehicles on designated roads or park in areas where vegetation is less than 8 inches tall. Vehicles, including the undercarriages, will be cleared of vegetation accumulations and checked periodically to ensure that there is no buildup of flammable vegetation.
- During welding, grinding, or wood-cutting activities, a spark shield adequate for the sparks will be used to prevent sparks from carrying. The activity area will be cleared of vegetation within range of the sparks for that particular action. Water may be used to wet down surrounding vegetation but does not take the place of an adequately cleared area and spark shield.
- No smoking will be allowed while walking or working in areas with vegetation. Smoke only in cleared areas. In areas where smoking is allowed, completely extinguish all burning tobacco and matches and discard them in ash trays and/or fireproof containers, not on the ground.
- No open burning of any material or other open fires will be allowed.
- The use of torches, fuses, highway flares, or other warning devices with open flames will be prohibited. EPE will use only electric or battery-operated warning devices in the activity area.
- All used and discarded oil filters and oily rags or other waste will be disposed of in an approved landfill. Glass jugs or bottles will not be used as containers for gasoline or other flammable materials.
- In addition to standard required fire safety equipment, fuel trucks will have, at minimum, a 35pound fire extinguisher charged with necessary chemicals to control electrical and gas fires. Helicopter fuel trucks will be grounded to the helicopter during refueling.

# Attachment 15



# Incident Management Plan (IMP)

Power Generation | System Operations | Distribution Operations



2017

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# **Revision History**

Revision	Release Date	Remarks
0.1	07/12/2010	For gathering inputs from Martin and Richard.
0.2	07/14/2010	For initial review by all relevant departments.
0.3	08/20/2010	For internal review by all relevant departments.
0.4	03/25/2011	Added roles in support of ICS Leads.
0.5	05/17/2011	Finalized baseline outage restoration plan.
0.6	05/24/2011	Updated with comments suggested during team review session by ICS Core Team and ICS Chiefs members on 5/19/2011.
0.7	07/13/2011	Updated to synchronize with ICS team improvements identified on 6/8/2011.
0.8	5/24/2012	Updated to include references to the Crisis Communications Plan and Crisis Communications Team.
0.9	12/12/2012	Updated to include System Operations and Generation inputs into the plan.
1.0	01/28/2013	Updated with comments provided by System Operations and Power Generation.
1.1	2/6/2013	Updated with comments provided by System Operations, Power Generation and Distribution Operations
1.2	2/3/15	Updated with comments provided by System Operations, Power Generation and Distribution Operations
1.3	8/11/17	Updated plan

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Attachment 15: IMP

# PROMULGATION

This El Paso Electric Incident Management Plan, which sets forth general policies and procedures for emergency preparation and response activities, will be carried out by El Paso Electric personnel to provide the communities it serves with an effective, integrated, and unified response to and recovery from an emergency event or incident.

This plan has been approved and is hereby promulgated as the authoritative document for emergency response and operations at El Paso Electric. In the event of an unavailability of executive officers, we hereby grant any person assigned the role of Incident Commander the authority to activate and implement this plan.

### **APPROVAL**

We, the undersigned, approve this Incident Management Plan for El Paso Electric.

	Date:
CEO, El Paso Electric	
	Date:
SR VP & COO, El Paso Electric	
	Date:
SR VP Corporate Planning, El Paso Electric	
	Date:
SR VP General Counsel & CCO, El Paso Elec	tric
	Date:
Vice President T&D, El Paso Electric	
	Date:
Vice President Power Generation, El Paso Ele	ctric
	Date:
Vice President Compliance & CRO, El Paso El	ectric
	Date:
Vice President Treasurer, El Paso Electric	
	Date:
Vice President Chief Human Resources Office	r, El Paso Electric

# **SECTION 1 - ORGANIZATION AND FUNCTIONS**

# 1. Introduction

a. <u>Plan Overview</u>

The El Paso Electric (EPE) corporate philosophy provides the basis for its incident management strategy: to safely restore electric service in a minimum amount of time. The Incident Management Plan (IMP) uses this principle to assess damage and to establish guidelines for pre-incident preparedness, pre-incident planning, incident response, communications, and return to normal operations.

The IMP provides guidelines to ensure timely communication and coordination between company departments, operations personnel, and key decision makers. It also facilitates coordination among various outside agencies to ensure a timely and effective response to an outage restoration related emergency.

The IMP describes the Incident Command System (ICS) from Federal Emergency Management Agency (FEMA), whose structure and principles are used to manage an incident or emergency.

The purpose of this plan is to provide an overview of pre-event preparations, response organization, and restoration processes following an event, as well as to document the **IMP's** linkages to related departmental plans, procedures, checklists, and job aids.

### b. Plan Scope

The IMP scopes the operational response and recovery related to one or more line(s) of business including but not limited to Power Generation, System Operations and Distribution Operations.

The IMP is designed to provide a systematic and efficient approach to recover from the effects of an incident in the safest and most efficient manner possible. It is intended to maintain flexibility so that specific details of restoration and recovery can be tailored to address varying incidents. The plan provides a guide to assist management and response personnel in identifying resources, materials, and priorities required for an efficient restoration process.

Function specific roles and descriptions in support of this plan with detailed instructions are covered in the General Appendices. This plan provides the high level strategy and consolidates coordination for the incident management process. The IMP defines the management structure and outlines response activities for extensive emergency incidents at the operational level.

Responsibilities are based on a functional approach to provide the appropriate skill sets required to most effectively support response activities.

While many events can necessitate the need for a restoration event, the most common is severe weather. As such, the initial incident analysis usually takes the form of evaluating weather forecasts. The company maintains contracts with professional meteorologists to provide tailored weather forecasts and detailed meteorological information. Publicly available weather information is also used to provide further validation. For a significant weather event, field deployment will take place as soon as it becomes safe for EPE personnel to travel or perform the assigned work tasks. Other incident types are defined below but these definitions do not encompass the full range of incidents that could affect EPE's electric system operation.



# Attachment 15: IMP

# PAGES 8-35 HAVE BEEN REDACTED

# Attachment 16



# Incident Management Plan (IMP) GENERAL APPENDICES

Power Generation | System Operations | Distribution Operations



October 18, 2016

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## **Revision History**

Revision	Release Date	Remarks
Draft	5/17/11	For internal review by all relevant departments
0.1	5/24/11	Updated with comments suggested during team review session by ICS Core Team and ICS Chiefs members on 5/19/2011
0.2	7/13/11	To synchronize with ICS team improvements identified on 6/8/11
0.3	5/24/12	To update Appendix 15 – Public Information Officer to include reference to the Crisis Communications Plan and Crisis Communications Team. Added contact information for ZIA Natural Gas.
0.4	10/26/2012	To update inputs from Safety, Security and Environmental.
		To scope the content in this document as general appendices so it is applicable to both system operations and distribution operations.
0.5	12/10/12	To relocate Appendix 2, 6, part of 9, 21 and 22 to the Distribution Appendix. Re-number General Appendix Sections. Updated System Operations and Generation information.
0.6	01/28/2013	IMP-10: ICS chart is updated; position descriptions and counts needed for various levels are added by System Operations.
0.7	08/17/2016	Updated IMP-2 through IMP-5
0.8	09/01/2016	Updated IMP-7 through IMP-10
0.9	09/02/2016	Updated IMP-11
1.0	10/18/2016	Updated IMP-12
   1.1	10/19/2016	Updated IMP-13 through IMP-21

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PAGES 7-106 HAVE BEEN REDACTED

# Attachment 17



# Incident Management Plan (IMP) Distribution Appendices



August 17, 2016

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# EL PASO ELECTRIC

INCIDENT MANAGEMENT PLAN (IMP) – DISTRIBUTION APPENDICES

# **Revision History**

Revision	Release Date	Remarks
Draft	5/17/11	For internal review by all relevant departments
0.1	5/24/11	Updated with comments suggested during team review session by ICS Core Team and ICS Chiefs members on 5/19/2011
0.2	7/13/11	To synchronize with ICS team improvements identified on 6/8/11
0.3	5/24/12	To update Appendix 15 – Public Information Officer to include reference to the Crisis Communications Plan and Crisis Communications Team. Added contact information for ZIA Natural Gas.
0.4	10/26/2012	To update inputs from Safety, Security and Environmental.
		general appendices so it is applicable to both system operations and distribution operations.
0.5	12/5/12	Moved Appendix 2, 6, 9, 21 and 22 to Distribution Appendices document.
0.6	2/6/13	Updated D-5: Debris Management Plan
0.7	8/17/16	Updated D-1: Emergency Agency Contacts & D-2: Internal and External Communications

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PAGES 4-17 HAVE BEEN REDACTED



# El Paso Electric Pandemic Readiness Plan

VERSION 2.0

### Approval

The undersigned individual(s), approve this Pandemic Readiness Plan.

Wayne Soza, VP – Compliance & CRO	Date	
Victor Rueda, VP – Human Resources	Date	
David Hawkins, VP – Generation System Plan Dispatch	Date	
Clay Doyle, VP – Transmission & Distribution	Date	

### **Revision History**

The most recent history/version and list of modifications are documented in the table below:

Version	Date	Change Descriptions	Reviewed By

### Relationship to Other Plans

The pandemic plan is one of several contingency plans available for El Paso Electric (EPE) to implement during a crisis. It neither replaces nor supersedes any current, approved continuity plan; rather it supplements it. Those plans with which this plan interfaces or works in parallel include:

- Business Continuity Plan
- Work Continuation Plan
- Crisis Management Plan
- Crisis Communication Plan

The interaction between these plans is situation dependent.

### Key Terms & Acronyms

Key	Definition
Term/Acronym	
PRP	Pandemic Readiness Plan
WHO	World Health Organization
PTF	Pandemic Task Force
CDC	Centers for Disease Control and
	Prevention
ICS	Incident Command System
NIMS	National Incident Management System

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### Introduction

Pandemics are unpredictable but recurring events that can have consequences on human health and economic well-being. For this reason, EPE has engaged in planning for a pandemic to protect lives and to assure EPE can continue to perform essential functions during a pandemic event. The Pandemic Readiness Plan (PRP) describes EPE's strategy to prepare for and respond to a pandemic. Protecting and improving the resilience of EPE's operations in the face of disruptions such as a pandemic, will be an ongoing effort that will require continued vigilance, contingency planning, and training.

#### Purpose

The purpose of the PRP is to provide guidance to identify, prepare, respond and recover from a pandemic event. In addition to providing pandemic guidance, the objective of the PRP is to limit the spread of the virus; and if possible minimize serious illness, hospitalizations, and death; and to sustain critical infrastructure.

#### Scope

The PRP applies to all EPE employees, contractors, vendors, and other affiliates. It establishes a framework for coordination among individuals of multiple departments to ensure prevention and control measures are in place to complete the lifecycle of a pandemic event within the organization.



## **Attachment 18: Pandemic Readiness Plan**

PAGES 7-40 HAVE BEEN REDACTED

The items listed below are the modifications operations for Distribution Dispatch in response to the COVID-19 pandemic

- 1. Situational Awareness
  - a. Initiated a department SMS text chat. Dispatcher and Operator company issued phones are not smart phones. The group chat allowed for Supervisor to keep team up to date on pandemic related items as they arise. Personal phones we included on the group, due to limited capabilities on the company issues flip phones
  - b. Increased safety
- 2. Social Distancing
  - a. Supervisor working from home 50% of the time.
  - b. Outages Analysts/OMS admins are working from home 100% of the time.
  - c. Full wipe down of workstations and common areas, before and after each shift.
  - d. Modified schedule to eliminate shift overlap and reduce the number of days at work. Dispatcher and Operators only have three scheduled days at work (3-12hr days, with 4 hours of homework). 24 hr coverage with 2 employees always on shift. Same pair of Dispatchers/Operators work together (on same shift) during pandemic, no overlap with other shifts. This schedule did reduce efficiencies during working hours (normally there is three employees on shift during working hours).
  - e. Activated second location/radio room (within same building) to increase work station count and assigned dedicated work stations for 8 Dispatchers/Operators. This required the relocation of 2 other departments. Second location has some limitations: one radio counsel for two work stations reduced access to department mapping (no hard copy onelines).
  - f. Assigned one Dispatcher and one Operator to work from home indefinably during pandemic (not enough dedicated work stations to work from office). Employees at home have full access to all software, additional monitor and utilize Skype audio to stay in constant contact with their team mate in the radio room. Limitations at home include: unable to answer radio room phone calls, and only able to Dispatch on EPE-1 radio band, otherwise, can provide full shift support from home.
  - g. Equipped additional employees to work from home as needed. Assigned extra monitors and cables. Most employee are using personal PCs, two employees were assigned company laptops due to limited/no connection at home.
  - h. Assigned dedicated Keyboards, mice and headsets per Dispatcher and Operator. This required installation of USB hubs on each PC.
  - i. Modified crew call out process to avoid mixing crews.
- 3. Equipment
  - a. Freezer, stocked with food, was placed in radio room, in preparation for possible sequestration.
  - b. Increased stock of disinfectant supplies, keep two weeks' worth on hand.
  - c. Stocked up on air purifiers replacement filters
  - d. Utilize UV light to disinfect Radio Rooms on a regular basis.
  - e. Stocked up on IT equipment (cables, adapters microphones), for possible work from home assignments.
- 4. Procedures
  - a. Updated department pandemic playbook
  - b. Prepared sequestration plan (with schedule and building preparations)

fre Latria	PLAN	Document No.	OSO-C6R1
Company		Version No.	2.0
El Paso Electric		Effective Date	12/18/2019
Physical Security Plan for Medium/High Assets		Document Classification	

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#### Purpose

This physical security plan describes the procedures El Paso Electric Company (EPE or the Company) uses to secure certain assets and facilities to secure EPE personnel and property and ensure compliance with NERC Standard CIP-006-6 R1. It will be used as the basis for EPE employees to understand, implement, and regularly refine and improve physical security methods at covered facilities.

#### Scope

#### Personnel, Assets, and Events

This plan applies to EPE High and Medium Impact BES Cyber Systems, their associated Physical Access Control Systems (PACS), their associated Electronic Access Control or Monitoring Systems (EACMS), and their associated Protected Cyber Assets (PCA). The plan applies to all EPE employees, contractors, or visitors who work at or with the applicable assets, including but not limited to the System Operations, Energy Management Support Services (EMSS), the Office of Security Operations (OSO), and NERC Compliance Group (NCG) business units. The plan covers standard physical security

## **Attachment 20: Physical Security Plan**

PAGES 2-16 HAVE BEEN REDACTED



### El Paso Electric Power Generation Seasonal Readiness Procedure



Number:	Subject:		
PG-BOP-OP-001		SEASONAL	READINESS
Approved for use by: Fred R. Prutch	Current Issue: Rev 0	<b>Issue Date:</b> 09/24/2021	Last Revision Date: 09/24/2021
Page 1 of 2 9	Prepared by:	Fred R Prutch	

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#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this procedure is to describe the process to prepare the El Paso Electric Power stations for reliable operation during the summer and winter periods and is to be used in conjunction with site-specific seasonal readiness procedures.

## Attachment 21: Power Generation Seasonal Readiness Procedure

PAGES 2-29 HAVE BEEN REDACTED



## COPPER POWER STATION EMERGENCY ACTION PLAN

### OCTOBER 2017



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### COPPER POWER STATION EMERGENCY ACTION PLAN

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### COPPER POWER STATION EMERGENCY ACTION PLAN

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#### COPPER POWER STATION EMERGENCY ACTION PLAN

#### PROMULGATION

The El Paso Electric Company (EPE) Copper Power Station (CPS) Emergency Action Plan (EAP or Plan), is composed of the Incident Team Members (ITM or Team), the authorization protocol that will be implemented in the event of an emergency, and the defined roles and responsibilities of each of the team members. The CPS EAP sets forth the general procedures, governing framework, and evacuation procedures that will be utilized in different types of emergency situations. These activities will be carried out by EPE personnel in order to provide a unified, safe, and efficient approach to managing each type of emergency situation.

This Plan has been approved by EPE's Executive Management (EM) and has been reviewed by the EI Paso Fire Department (EPFD) which is in accordance with the 2015 International Fire Code. This document is hereby promulgated as the authoritative document for the EPE CPS Building. A copy of this Plan will be made available to the EPFD upon request. In the event of the unavailability of the Chief Executive Officer and the Incident Commander (IC), we hereby grant the designated alternates of the CPS EAP the authority to activate and implement this Plan.

#### APPROVAL

The undersigned below agreed to and approves this CPS EAP for EPE.

Vice President, Compliance and Chief Risk Officer El Paso Electric

Date: 10/12/17

## **Attachment 22: Copper Power Station Emergency Action Plan**

PAGES 5-54 HAVE BEEN REDACTED



### MONTANA POWER STATION EMERGENCY ACTION PLAN

AUGUST 2017



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#### MONTANA POWER STATION EMERGENCY ACTION PLAN

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#### MONTANA POWER STATION EMERGENCY ACTION PLAN

#### PROMULGATION

The El Paso Electric Company (EPE) Montana Power Station (MPS) Emergency Action Plan (EAP or Plan), is composed of the Incident Team Members (ITM or Team), the authorization protocol that will be implemented in the event of an emergency, and the defined roles and responsibilities of each of the team members. The MPS EAP sets forth the general procedures, governing framework, and evacuation procedures that will be utilized in different types of emergency situations. These activities will be carried out by EPE in order to provide a unified, safe, and efficient approach to managing each type of emergency situation.

This Plan has been approved by EPE's Executive Management (EM) and has been reviewed by the Montana Vista Fire Rescue (MVFR) and the EI Paso County Emergency Services District #2 (EPCES#2) which is in accordance with the 2015 International Fire Code. This document is hereby promulgated as the authoritative document for the EPE MPS Building. A copy of this Plan will be made available to the MVFR and EPCES#2 upon request. In the event of the unavailability of the Chief Executive Officer and the Incident Commander (IC), we hereby grant the designated alternates of the MPS EAP the authority to activate and implement this Plan.

#### APPROVAL

The undersigned below agreed to and approves this MPS EAP for EPE.

Date: 8/21/17

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Vice President, Compliance and Chief Risk Officer El Paso Electric