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Guadalupe Valley Electric Cooperative, Inc. Emergency Operations Plan Effective April 12, 2022

Redacted Version

Executive Summary 16 TAC § 25.53(c)(1)(A)(i)

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This Plan is Confidential and Contains Sensitive Information that is NOT to be Shared Outside of GVEC, PUCT, ERCOT, or Other Entity as Required by Law.

Record of Distribution - 16 TAC § 25.53(c)(4)(A)

Name	Title	Date of Access and/or Training
See attached list- Winter Tabletop Exercise Attendees		December 8, 2021

Cooperative Emergency Contacts:

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830.857.1156

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Affidavit as Required by 16 TAC § 25.53(c)(4)(C)

STATE OF TEXAS
COUNTY OF GONZALES

§ §

Before me, the undersigned authority, on this day personally appeared Darren Schauer, who is known to me and who, being first duly sworn by me, declares that:

My name is Darren Schauer. I am the General Manager and Chief Executive Officer for Guadalupe Valley Electric Cooperative, Inc. ("GVEC"). I am over the age of 18 years, of sound mind, and have the legal capacity to execute this Affidavit. All matters stated in this Affidavit are true and correct and are based on my personal knowledge.

Relevant operating personnel are familiar with and have received training on the applicable contents and execution of this EOP, and such personnel are instructed to follow the applicable portions of this EOP except to the extent deviations are appropriate as a result of specific circumstances during the court of an emergency.

This EOP has been reviewed and approved by the appropriate executives.

Drills have been conducted to the extent required by subsection (f) of 16 Texas Administrative Code § 25.53.

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

GVEC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

GVEC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

FURTHER AFFIANT SAYETH NOT

Darren Schauer

General Manager & Chief Executive Officer Guadalupe Valley Electric Cooperative, Inc.

SIGNED under oath before me on

Notary Public, State of Texas

My commission expires on:

Purpose and Need - 16 TAC § 25.53(d)(1)

In our industry, there exists a need for a plan for an organized, safe but quick recovery from different types of man-made and/or natural disasters. These types of disasters have been known to cripple, or destroy, business functions and even entire organizations. Given the events of September 11, 2001; the floods of 1998 and 2002; Hurricanes Katrina, Rita, and Harvey; the Texas wildfires of 2011; Winter Storm Uri of 2021; Physical and Cyber Attacks around the world and within the electric utility industry the need for a strong Emergency Operations Plan has increased exponentially.

Given the natural exposure to man-made and/or weather-related outages, GVEC has produced, in cooperation with TEC and NRECA, a written disaster mitigation plan to guide us in proactive and reactive recovery of systems, lines and equipment should a disaster, or emergency, affect our service area. As part of the plan, we have entered into mutual aid agreements between member-owned electric cooperatives within Texas and the Nation. As GVEC's sole source supplier, TEC assists in coordination prior to, during and following a disaster for equipment, materials, and manpower to meet the needs of the cooperative.

Several types of disasters can occur that threaten our ability to efficiently, or reliably, provide service to our members and customers. Disasters such as pandemics/epidemics, weather, fire, vandalism, sabotage, and terrorism can result in tools, equipment, on-site data, hardware, software, and facilities being lost, damaged, vandalized, or destroyed. Some of this damage or loss may be isolated to a small area or even system wide. These disasters tie in with the potential for loss of service from other electric, communications and power generation utilities and facilities. Sabotage can be either from external forces causing damage to structures, facilities, data through hacking or viruses, or from internal sources (personnel) damaging company resources.

The purpose of this Emergency Operations Plan is to serve as a high-level guide to maintain business continuity in the event that any of the aforementioned disasters were to occur. The Senior Executive Staff will review and update this Plan, at least annually or after each major event in which the plan is activated. The Officers of GVEC will approve each update of the plan. A copy of the Plan will be stored electronically and with Senior Executive Managers. A copy of the plan will be sent through GVEC's regulatory law firm to be filed with the Public Utility Commission of Texas (PUCT) as required by law. The PUCT and other required agencies will be notified at least 30 days in advance of conducting a tabletop drill.

II. Objective - 16 TAC § 25.53(d)(1)

The objective of this Emergency Operations Plan is to provide GVEC employees with a guide to improve the effectiveness and responsiveness of all aspects of business continuity for the Cooperative leading up to, and following, various types of storms and/or disasters or pandemic/epidemics. GVEC's Corporate Officers will oversee the coordination of this plan to assist all departments within the Cooperative in developing a comprehensive plan by focusing on the following:

- Recognition of potential emergencies or disasters, natural or man-made.
- Pandemic/Epidemics that affect the availability of personnel due to viruses and illnesses that affect our ability to provide high quality service to our membership and customers.
- o Identification of the business and operations functions that could be affected in different emergencies.
- Mitigation efforts that will have a direct effect of reducing the impact on critical functions.
- o Proactive measures to prevent a possible event or minimize the effects.
- O Short-term tactical restoration recommendations.
- Long-term strategic restoration and/or risk reduction recommendations.
- Recordkeeping of damages to facilities, data and data systems, vehicles, and equipment for possible reimbursement from the Cooperative's insurances and FEMA; and
- Annual mock tabletop drills involving all areas and departments of the Cooperative to ensure we are prepared for a disaster and as required by 16 TAC § 25.53(f)*

This is a living document and will be reviewed periodically and updated at least annually with coordination by the GVEC Senior Executive Staff with input from all departments. The Officers of GVEC will approve each update of the plan.

*A tabletop exercise will be conducted at least once annually with managers and staffs to ensure the accuracy and functionality of the plan.

III. Definitions - 16 TAC § 25.53(d)(1)

CISA – Cybersecurity & Infrastructure Security Agency; a dept. of DHS Website – https://www.cisa.gov

Coastal Ingress and Egress Routes – TxDOT routes for public evacuation and emergency responder's ingress into disaster areas.

Cooperative – includes GVEC and all subsidiaries.

Critical Care Customer – **(PUCT)** Critical Care Residential Customer -- A residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or redesignation is effective for two years under this section.

Critical Load Customer – **(PUCT) Critical Load Industrial Customer** -- An industrial customer for whom an interruption or suspension of electric service will create a dangerous or life-threatening condition on the retail customer's premises, is a "critical load industrial customer."

DHS – Department of Homeland Security; can be Texas or United States DHS

Direct – (referencing contractors) – GVEC employees shall guide contractors to jobsites, answer questions, act as a liaison for them, but not supervise their crews.

EEA – Energy Emergency Alert

E-ISAC – Electric Information Sharing and Analysis Center site – https://www.eisac.com

EOP – Emergency Operations Plan

Epidemic – Disease or Illness that always in a community, but at a low frequency.

FEMA - Federal Emergency Management Administration Website - https://www.fema.gov

Hazard Recognition APP – GVEC APP that provides employees to report hazards electronically and the ability to document, track and make repairs.

ILO - Infrastructure Liaison Officer of TxDPS

NHC – National Hurricane Center Website – https://www.nhc.noaa.gov

NIDIS – National Integrated Drought Information System – a multi-agency partnership that coordinates drought monitoring, forecasting, planning and information at national, tribal, state, and local levels. Website – https://www.drought.gov

NIFC – National Interagency Fire Center – The nations support center for wildland fires and other emergency situations. Website – https://www.nifc.gov/fire-information

NOAA - National Oceanic Atmospheric Administration, U.S. Drought Monitor - Provides current soil moisture

conditions. Website - https://www.drought.gov

Non-Pre-Event Contractor – A contractor that does not have a current or valid contract with GVEC prior to a disaster or event. The Short-Term Independent Contractor Agreement can be requested from the Compliance and Safety Team.

NRECA – National Rural Electric Cooperative Association Website – https://www.electric.coop

NWS - National Weather Service - Website - https://www.weather.gov

NWS Fire Weather Information – Provides interactive national, regional, state, and local conditions that could lead to a fire weather watch. https://www.weather.gov/lwx/WarningsDefined - Fire%20Weather%20Watch

OIG - Office of the Inspector General, the oversight authority for FEMA

Pandemic/Epidemic – Serious, possibly life-threatening disease or illnesses that affects widespread geographic regions and may have serious impacts on the workforce and public.

SCADA – Supervisory Control and Data Acquisition. The means of monitoring and controlling transmission, substation, and distribution equipment.

Shall – Mandatory, to be followed as written or stated.

Should – Recommended, suggested to consider, but not mandatory.

Tabletop Exercise – A face-to-face interactive group drill where participants use strategic problem solving to work through and resolve a number of disaster and/or emergency related scenarios.

TDEM – Texas Division of Emergency Management – Website – https://www.tdem.texas.gov

TEC – Texas Electric Cooperatives – Website – https://texas-ec.org

Texas Forest Service – A state agency residing within the Texas A&M university system, mandated by the state in 1915 to "assume direction of all forest interest and all matters pertaining to forestry within the jurisdiction of the state". Website – $\frac{https://tfsweb.tamu.edu}{https://tfsweb.tamu.edu}$

TxDOT – Texas Department of Transportation Website – https://texas-ec.org

TxLOMC – Texas Local Office of Emergency Management (County EMC's)

TxREMC – Texas Regional Emergency Management Coordinator – GVEC Service is in regions 12 (Caldwell and Fayette), 17 (DeWitt, Gonzales, Goliad, Lavaca, and Victoria), 18A (Comal and Guadalupe) and 18B (Atascosa, Bexar, Wilson, and Karnes)

Wildfire - A wildfire, forest fire, bushfire, wildland fire or rural fire is an unplanned, unwanted, uncontrolled fire in an area of combustible vegetation starting in rural areas and urban areas. Notifications from the NWS, NIDIS and NIFC provide the weather forecasts and drought conditions that will lead GVEC to activate the wildfire plan.

IV. Emergency Operations Plan: Summary and Scope - 16 TAC § 25.53(d)(1)

GVEC maintains an Emergency Operations Plan (EOP) in anticipation of natural disasters or situations involving curtailments or major interruptions in service to our membership and customers. The plan establishes organizational and personnel assignments, describes emergency communication procedures, lists emergency contacts and other pertinent information. It also contains information concerning members with life-sustaining electrical equipment and plans for communication with all customer classes.

A significant portion of the plan concerns the coordination of emergency assistance with TDEM, TxREMC, TxLOMC and other local, state, and federal agencies, neighboring cooperatives, construction contractors, and other utilities.

Our Plan was based on the model created by NRECA and TEC so that there would be a basis for uniformity from cooperative to cooperative. Adjustments were made that are unique to GVEC and our subsidiaries. All contents of this Plan are confidential and not to be shared outside GVEC except as required by applicable law.

Motive for the Plan

This Plan serves as a guideline for restoration of electric, fiber and communications service to our members and customers due to interruptions during storms, other natural and/or man-made disasters and Pandemic/Epidemics that could have a severe effect on our ability to conduct business. The Plan is designed to provide a heightened awareness of the multitude of tasks that need to be concurrently accomplished to maximize time, effort, and the opportunity for damage assessment and restoration services to our membership and customers. The contents of this Plan may vary and shall be adapted as each situation requires for employees to respond swiftly and efficiently in times of emergencies to provide safe, productive, responsive power restoration, and continuity of service.

Scope of Plan

This plan will establish:

- 1. The levels of the emergency from Advisories to Warnings to major destruction or interruption of GVEC infrastructure and the ability to provide heightened services in cases of an emergency and/or disasters.
- 2. The steps of responsiveness for each level in preparing for an emergency due to weather, man-made disasters and/or pandemic/epidemics.
- 3. Responsibilities and duties of each Senior Manager, each Department and sometimes to specific individuals.

This plan will be reviewed periodically and updated by Senior Executive Managers with input from the leadership team. The official copy will be stored electronically for all GVEC employees to view.

A critique of this plan and its effectiveness should be conducted following any disaster/emergency that requires the use of this plan to recover. The critique should generate improvements and formulate solution strategies regarding noted weaknesses in the plan.

Individuals Responsible for Maintaining, Implementing, and/or Modifying EOP

Name	Title
Darren Schauer	General Manager & CEO
Sean Alvarez	Chief Operating Officer
Gary Korn	Chief Financial Officer
Ashley Coburn	Chief People Officer
Bobby Christmas	Sr. Executive Manager, Compliance

History of Revisions

Initial EOP filing pursuant to 16 TAC § 25.53(c)(1) filed on April 12, 2022

Revised:

List of Changes as of Revised Date:

Approval and Superseding Statement

This EOP approved on April 12, 2022, supersedes any and all previous GVEC EOPs.

V. WEATHER & MAN-MADE EMERGENCIES: OPERATIONS RESPONSE - 16 TAC § 25.53(d)(5)

This section includes information regarding identification, operational preparation and response for weather related and man-made impacts to operations. Appropriate levels of action are defined below for advisory and level 1 through level 5 emergencies. The following weather and man-made conditions are addressed:

- Hurricanes
- Cold and Freezing Weather
- Local Severe Weather
- Flooding
- Hot Weather and Heat Advisory
- Drought Conditions
- Red Flag Advisory
- High Wind Advisory
- Wildfire
- ERCOT Conservation & Load Shed
- Pandemic/Epidemic
- Terroristic Threat

Levels of Action

Typical seasonal thunderstorms where power is estimated to be restored in less than 24 hours without external assistance may fall under an **Advisory**, **Level 1 or Level 2 emergencies**.

Severe Thunderstorms, Tropical Storms, Hurricanes and/or disasters where power is estimated to exceed 24 hours and requires external assistance to complete fall under Level 3, Level 4, and Level 5 emergencies.

Drought conditions, Terroristic Threats, Energy Emergency Alerts (EEA's) and Pandemic/Epidemics can range from **Advisory to Level 5** depending upon public notices or announcements from local, state, and federal officials and/or agencies.

Following the implementation of the EOP, a lessons learned meeting will be held to discuss event. Minutes of lessons learned meeting will be documented and available upon request.



Due to the Competitive and Confidential Contents contained within the EOP, the remainder of Section V, beginning on page 10, through Section XXIV ending on page 121 is Redacted.

XXV. Sections Not Applicable - 16 TAC § 25.53(d)

In accordance with 16 TAC § 25.53(d), the following sections under 16 TAC § 25.53 are not applicable to GVEC for the following reasons:

- Generally, sections pertaining to entities other than electric cooperatives (i.e., REPs, ERCOT, etc.) and those with generation facilities are not applicable to GVEC and therefore not included in this EOP. For instance, 16 TAC § 25.53(d)(2)(B)-(D) do not apply to GVEC.
- 16 TAC 16 TAC § 25.53(3)(1)(H) and (e)(2) does not apply to GVEC as it is not a transmission and distribution utility that leases or operates facilities under PURA § 39.918(b)(1) or procures, owns, and operates facilities under PURA §39.918(b)(2).

Distribution List for EOP December 8, 2021

Received EOP December 8, 2021 Winter Tabletop Exercise

Employee Name

Albert Villarreal

Anthony Ramirez

Ashley Coburn

Belen Sanchez

Bill Lange

Bobby Christmas

Brandon Lewallen

Bryan Boehl

Carolyn Morrow

Carri Hersh

Casie Boos

Ceason Barnick

Chad Guthrie

Chris Krueger

Chris Miller

Claire Hutyra

Colyn Beavers

Cortney Dubose

Courtney Pesak

Darren Kutz

Darren Schauer

David Burns

Denise Stewart

Diana Hill

Emily Gardner

Eric Moltz

Evan Overby

Gary Korn

Graham Hauptman

Greg John

Heather Peterson

Ida Herrera

James Hunter

James Kocian

Jarrott Crews

Jeff Bowles

Jeff Siegel

Jeff Strahl

Jenna Long

Jeremy Harder

Job Title							

Jeremy Neskora Jerry Krueger Joseph Garcia Joshua Tucker Justin Brown Karen Velazquez Keith Boenig Krista Davis Krisztina Shuping Lawren Kridler Lori Luensmann Luis Cortez Lyle Stratemann Mark Hengst Matthew Olson Michael White Michelle Scarbrough Natalie Garcia Pat Wenske Reese Lester Rhiannon Williams **Richard Campos** Richard McKinney Robbie Coldeway **Robert Cox** Robert Russell Sandra Young Sarah Martin **Scott Brown** Scott Jenschke Sean Alvarez Sergio Silva Shelby Mueller **Sherry Fishbeck** Stephen Brockman Susan Wilson Tammi Guthrie Tammy Thompson **Todd Craven** William Hughes William Nichols Zach Haupert Zach Land Zachary Taylor