



Filing Receipt

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Item Number - 1539

PROJECT NO. 53385

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

IP RADIAN, LLC'S SUPPLEMENTAL EMERGENCY OPERATIONS PLAN FILING

IP Radian, LLC ("IP Radian") hereby files this Supplemental Emergency Operations Plan (the "Plan") to ensure continued compliance with 16 TAC § 25.53. The IP Radian facility is a 320 megawatt alternating current solar facility located in Brookesmith, Texas in Brown County (the "Facility").

IP Radian filed its initial emergency operations plan in Project No. 53385 on April 15, 2022 and a confidential version on April 18, 2022 (Item Nos. 172 and 217, respectively). At the time of these initial filings, the Facility was under construction and IP Radian represented that it intended to file a revised emergency operations plan, executive summary, and affidavit no later than 30 days prior to its commercial operations date. In accordance with this representation, IP Radian filed a new emergency operations plan in Project No. 53385 on February 10, 2023. The public version is under Item No. 863 and the confidential version is under Item No. 865. These filings were also intended to comply with the March 15, 2023 deadline for the annual update contemplated under 16 TAC § 25.53(c)(3). While IP Radian believes it has met the rule requirements to date, it is making this filing in the abundance of caution to ensure all required documentation is satisfactorily provided to the Public Utility Commission of Texas ("PUCT").

This filing includes a complete copy of the Plan with all confidential portion removed (Attachment A). IP Radian also confirms that it has submitted this Plan in its entirety to ERCOT. This filing also includes:

1. an executive summary that describes the changes to the contents or policies contained in the Plan (below);
2. updated references to specific section and page numbers of the Plan (below);
3. the record of distribution (part of the Plan provided as Attachment A); and
4. the affidavit required (Attachment B).

EXECUTIVE SUMMARY

This Executive Summary describes the changes to the contents and policies contained in the Plan, includes updated references to specific sections and page numbers of the Plan that correspond with the requirements of 16 TAC § 25.53, references the Plan's record of distribution, and attaches the required affidavit and a redacted copy of the Plan.

A. Changes to the Contents or Policies Contained in the Plan

As discussed above, IP Radian initially filed its emergency operations plan while the Facility was under construction. During this time, IP Radian's emergency operations plan consisted of various plans, policies, and procedures from IP Radian's general contractor, Signal Energy. IP Radian intended to replace that initial plan with a plan more appropriate for the operational phase of the project closer to the time the Facility reached its commercial operations date. IP Radian's Plan filed on February 10, 2023 and attached to this filing completely replaced the initial emergency operations plan from the construction phase. As such, the contents or policies contained in this Plan are separate and distinct from those provided previously. This Plan supersedes the previous Plan and the purpose is to ensure the safety of people, property, and equipment as well as continued operations, to the extent practicable, through or immediately following emergency events.

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

Attachment A to this Executive Summary is a redacted copy of IP Radian's Plan. The purpose of the Plan is to outline and provide general guidelines for evaluating and responding to known and potential hazards or emergency conditions at the Facility. The Plan provides directions and responses to any emergency condition for plant personnel. Relevant personnel shall be trained in the actions that are to be taken should an emergency occur.

The Plan contains the following sections:

Content/Policies	Plan Reference
Executive Summary	Section 1.0, page 6-9
Roles and Responsibilities	Section 2.0, pages 9-12
Approval, Implementation, and Continuous Improvement	Sections 3.0, pages 12-13
Communication Plan	Section 4.0, pages 13-15
Plan to Maintain Pre-Identified Supplies	Section 5.0, page 15
Emergency Staffing Plan	Section 6.0, page 15
Training	Section 7.0, pages 15-16
Facility Emergency Contacts	Section 8.0, page 16
Weather Hazard Identification and EOP Activation Procedure	Section 9.0, page 17
Personnel Injuries or Serious Health Conditions	Section 10.0, pages 17-19

Content/Policies	Plan Reference
Fire Response Plan	Section 11.0, pages 19-21
Chemical or Oil Spills and Releases	Section 12.0, pages 21-24
Approvals	Section 13.0, page 24
Weather Emergency Annex	Section 14.0, pages 25-27
Water Shortage Annex	Section 15.0, page 27
Restoration of Service Annex	Section 16.0, page 27
Pandemic and Epidemic Annex	Section 17.0, page 27
Hurricane Annex	Section 18.0, pages 27-33
Cybersecurity Annex	Section 19.0, page 34
Physical Security Incident Annex	Section 20.0, pages 34-35

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

The Plan's record of distribution required by 16 TAC § 25.53(c)(4)(A) is included in Section 1.6, page 9 of the Plan.

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

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

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

The list of primary and backup emergency contacts for IP Radian required by 16 TAC § 25.53(c)(4)(B) is included in Section 1.4, pages 6-7 of the Plan.

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

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

Content/Policies	Plan Reference
Roles and Responsibilities	Section 2.0, pages 9-12
Approval, Implementation, and Continuous Improvement	Section 3.0, pages 12-13

Content/Policies	Plan Reference
Communication Plan	Section 4.0, pages 13-15
Plan to Maintain Pre-Identified Supplies	Section 5.0, page 15
Emergency Staffing Plan	Section 6.0, page 15
Training	Section 7.0, pages 15-16
Facility Emergency Contacts	Section 8.0, page 16

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

Content/Policies	Plan Reference	Rule Reference
Introduction of Plan and outline of its applicability	Section 1.2, page 6	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the Plan, and those who can change the Plan	Version History, page 2 Sections 2.2–2.3, page 10 Sections 2.5–2.7, pages 11–12	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change made to the Plan	Version History, page 2 Section 3.2, page 12	16 TAC § 25.53(d)(1)(C)
Dated statement that the current Plan supersedes previous plans	Version History, page 2	16 TAC § 25.53(d)(1)(D)
Date the Plan was most recently approved by IP Radian	Effective Date in cover page Version History, page 2	16 TAC § 25.53(d)(1)(E)

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

Section 4.0, pages 13-15 describes the procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.

I. Plan to Maintain Pre-Identified Supplies (16 TAC § 25.53(d)(3))

Section 5.0, page 15 describes IP Radian’s plan to maintain pre-identified supplies for emergency response.

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

Section 6.0, page 15 describes IP Radian’s plan to address staffing emergency response.

K. Weather Emergencies (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))

Section 14.0, pages 25-27 of the Plan includes IP Radian's plans for monitoring and responding to severe weather as outlined below:

Content/Policies	Plan Reference	Rule Reference
Event Identification	Section 14.2, page 25	16 TAC § 25.53(d)(5)
Operational Plan for Cold Weather Emergency	Section 14.3, pages 25-26	16 TAC § 25.53(d)(5) 16 TAC §§ 25.53(e)(2)(A)(i), (iii)
Operational Plan for Hot Weather Emergency	Section 14.4, page 26	16 TAC § 25.53(d)(5) 16 TAC §§ 25.53(e)(2)(A)(i), (iii)
Hurricane Annex	Section 18.0, pages 27-33	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(E)

The Plan does not include a verification of the adequacy and operability of fuel switching equipment, because the IP Radian Facility is a solar facility that does not consume fuels to operate. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply. Please refer to Section 4.4, page 14 of the Plan.

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

Section 15.0, page 27 identifies IP Radian's plans for keeping sufficient water onsite for staff consumption and housekeeping. The IP Radian Facility does not require water to operate.

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

Section 16.0, page 27 identifies IP Radian's plans intended to restore to service to a generation resource that failed to start or that tripped offline due to a hazard or threat.

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

Section 17.0, page 27 addresses IP Radian's pandemic and epidemic emergency response plan.

O. Hurricane Annex (16 TAC § 25.53(e)(2)(E))

Section 18.0, pages 27-33 contains IP Radian's hurricane annex, although the Facility is not located in a hurricane evacuation zone as defined by the Texas Division of Emergency Management ("TDEM").

P. Cybersecurity Annex (16 TAC § 25.53(e)(2)(F))

Section 19.0, page 34 contains IP Radian's cyber security annex.

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

Section 20.0, pages 34-35 contains IP Radian's physical security annex.

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

The following list provides additional sections of IP Radian's Plan that are appropriate for the IP Radian facility:

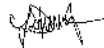
Content/Policies	Plan Reference
Personnel Injuries or Serious Health Conditions	Section 10.0, pages 17-19
Fire Response Plan	Section 11.0, pages 19-21
Chemical or Oil Spills and Releases	Section 12.0, pages 21-24

S. Drills (16 TAC § 25.53(f))

IP Radian plans to conduct a drill on its Plan in the first calendar year of commercial operations (i.e., 2023). IP Radian will notify the Commission and the TDEM district coordinator(s) of the date, time, and location at least 30 days in advance of the planned drill.

June 29, 2023

Respectfully Submitted,



Lucas A. Dunnington

President

IP Radian, LLC, a Delaware limited liability company

Attachment A

IP Radian, LLC

POLICY NAME	Emergency Operations Plan
EFFECTIVE DATE	2/10/23
VERSION NO.	1.0

VERSION HISTORY				
VERSION	APPROVERS	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR(S)
1.0	Director, Operational Compliance; VP, Operations; Chief Commercial Officer	2/10/23	New Procedure	B. Knowles, C. Wall, K. Macpherson

Version 1.0 of this EOP supersedes all previous EOPs as of revision date.

VERSION HISTORY				
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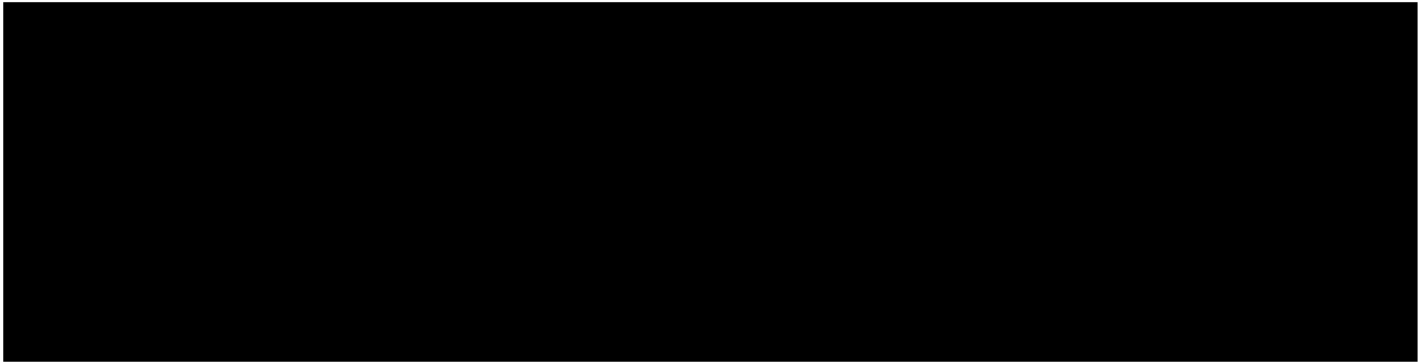
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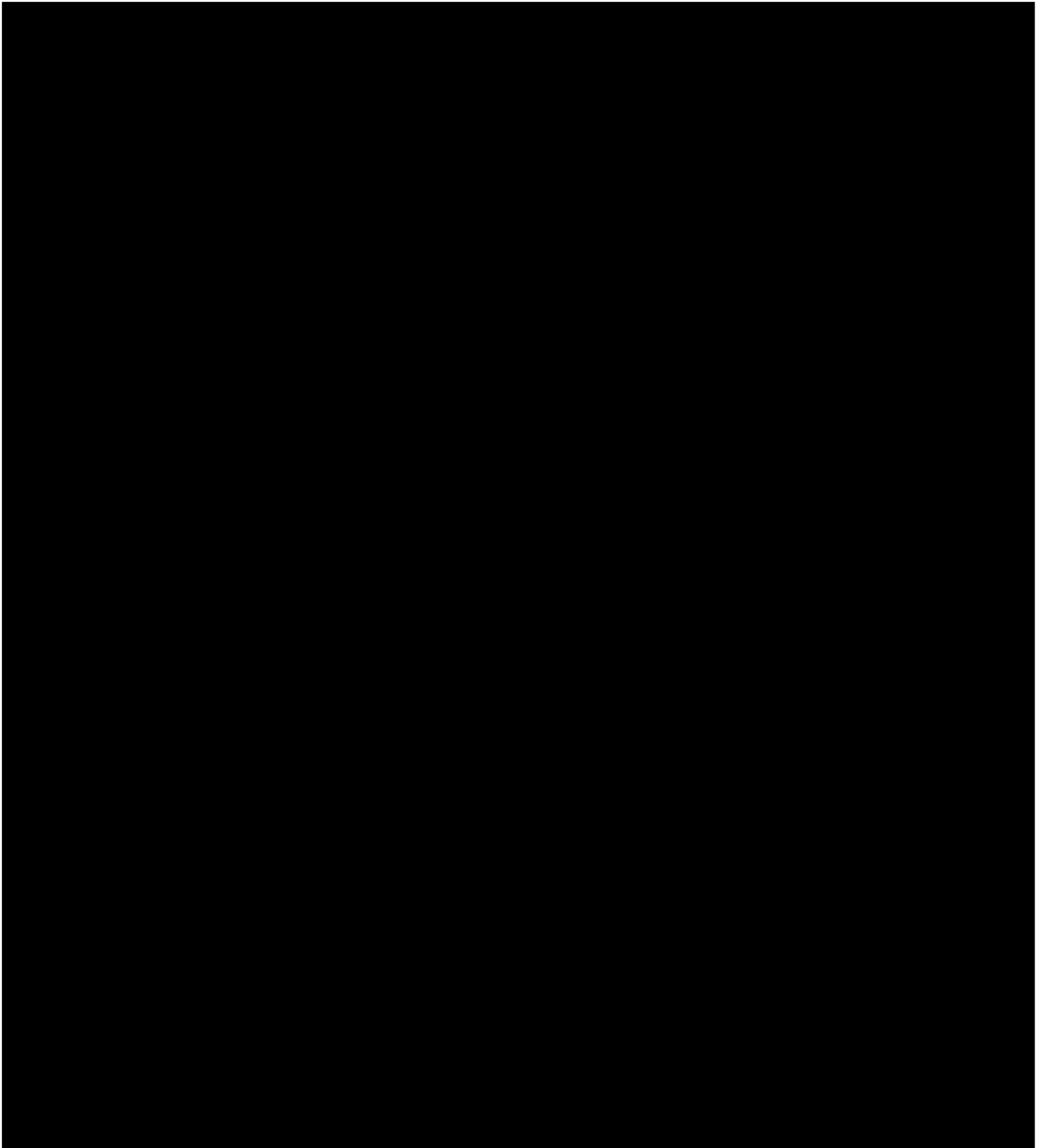
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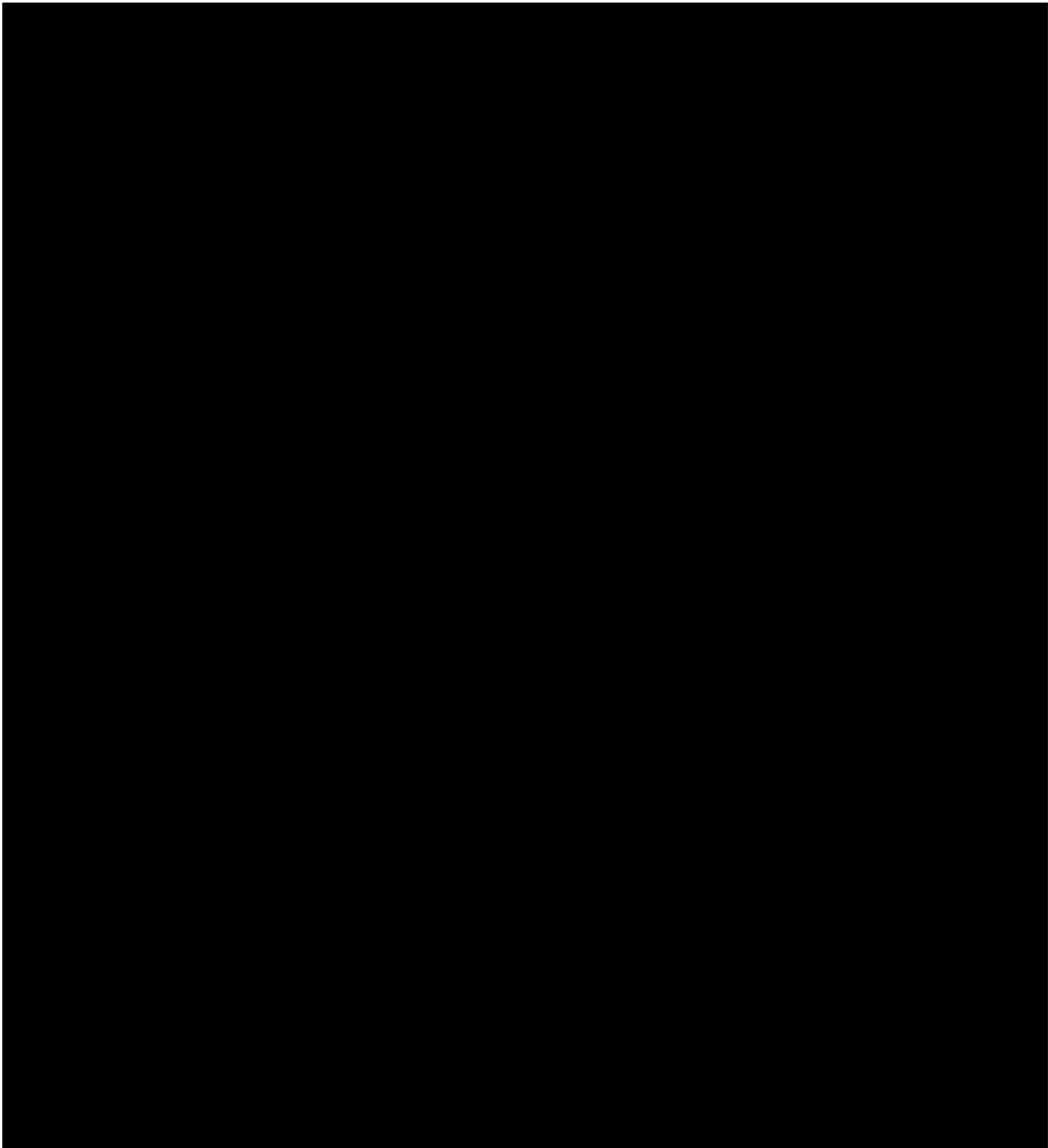
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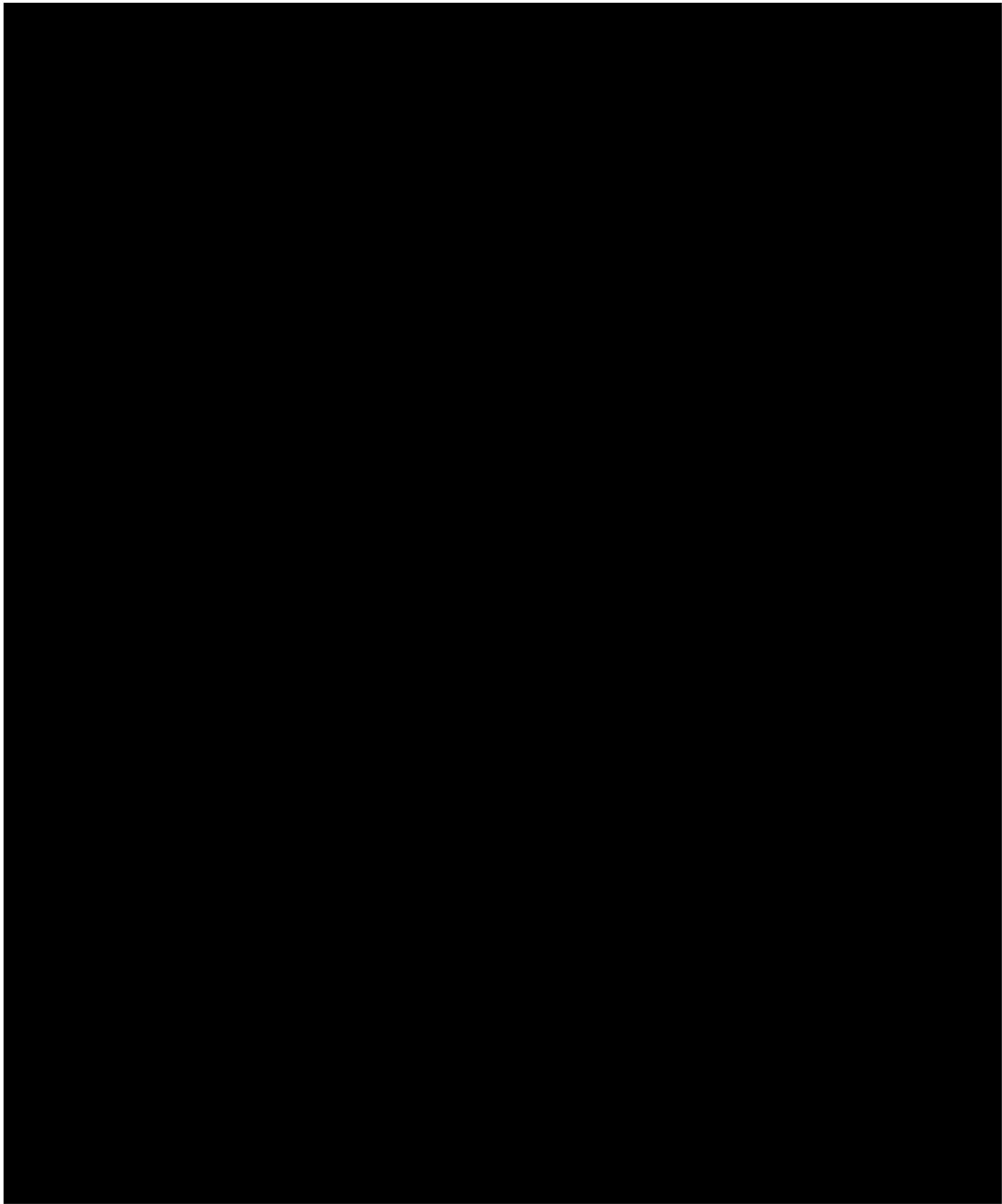
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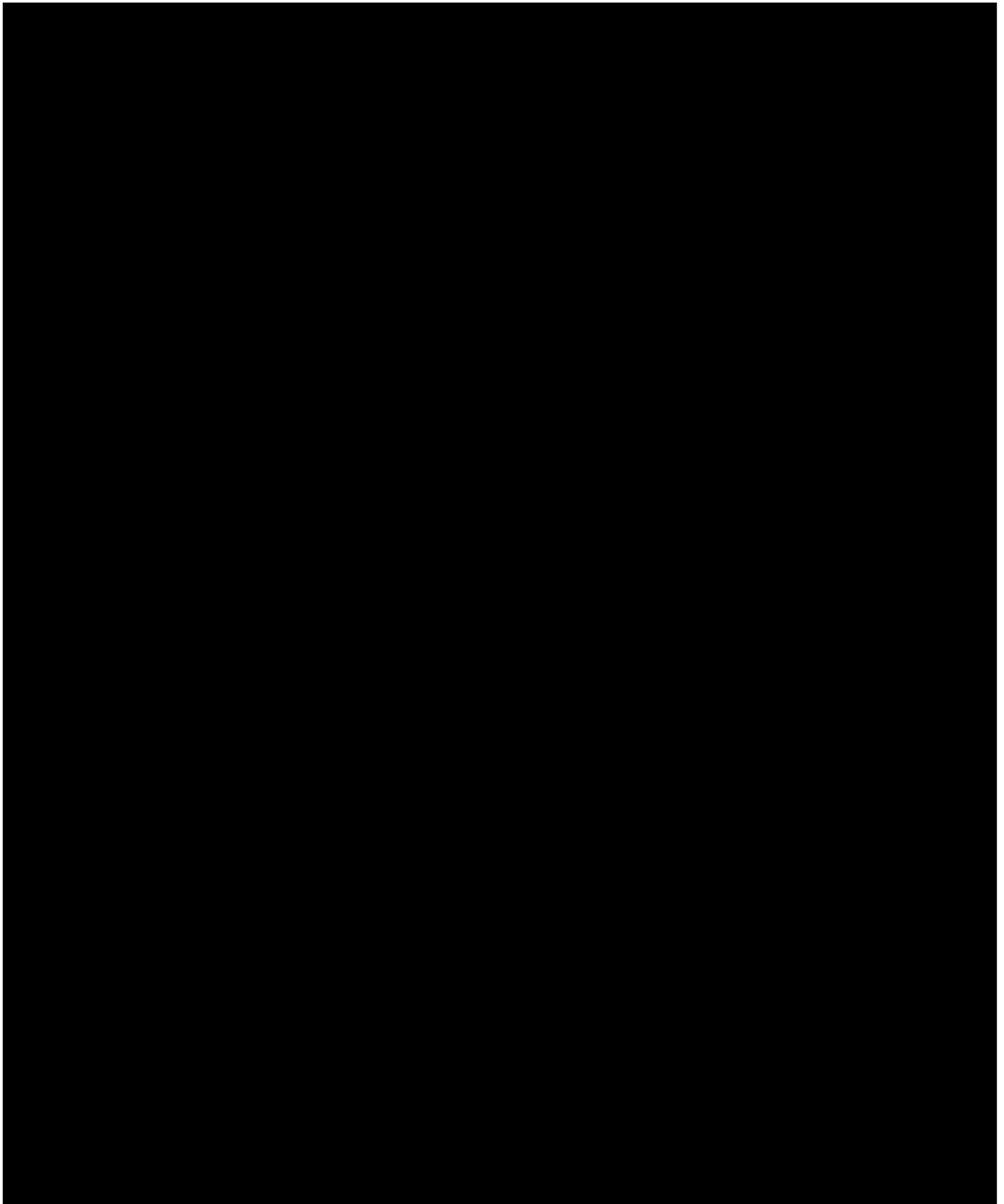
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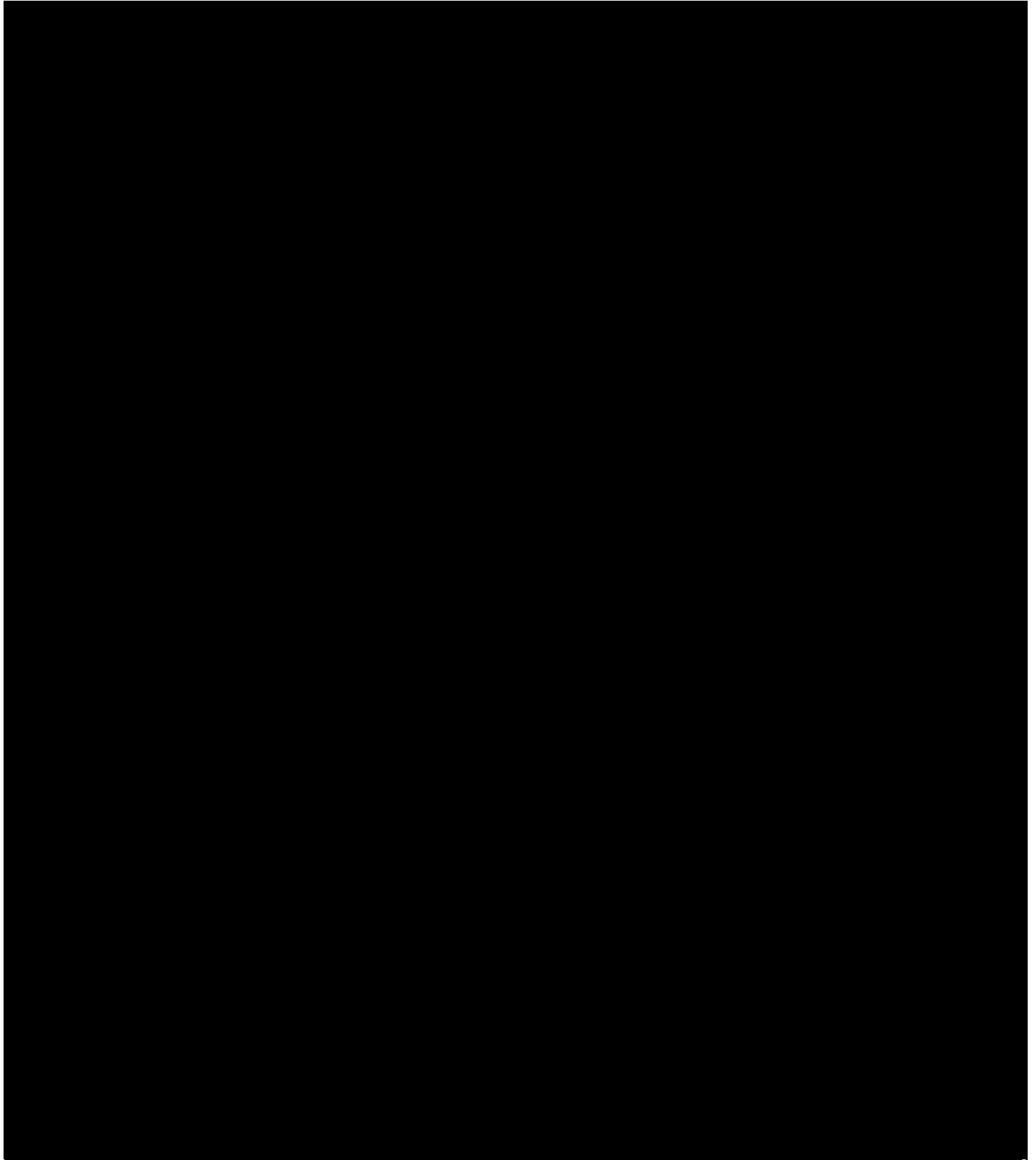
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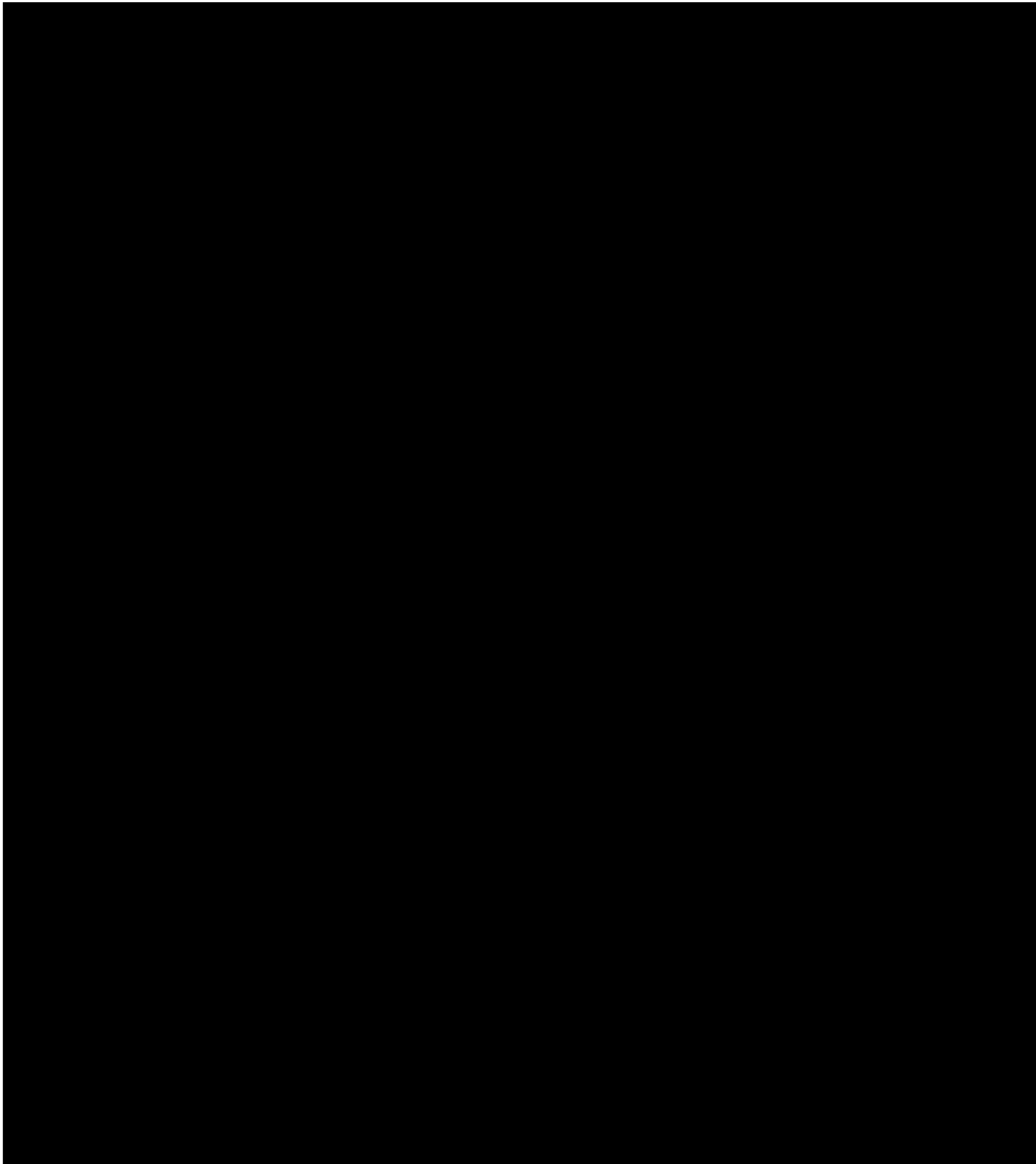
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Attachment B

AFFIDAVIT

THE STATE OF TEXAS

§

§

COUNTY OF HARRIS

§

BEFORE ME, the undersigned authority, on this day personally appeared Lucas A. Dunnington who swore an oath that the following facts are true:

1. My name is Lucas A. Dunnington. I am the President of IP Radian, LLC and am the highest-ranking officer with binding authority over IP Radian, LLC. I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of IP Radian, LLC. I have personal knowledge of the matters described herein.
2. IP Radian, LLC is registered with the Public Utility Commission of Texas as a power generation company (Registration No. 20661). The IP Radian, LLC facility is a 320 megawatt alternating current solar photovoltaic generation facility in Brown County, Texas.
3. Pursuant to 16 Texas Administrative Code (“TAC”) § 25.53, IP Radian, LLC filed its initial emergency operations plan for the construction phase on April 15, 2022. On February 10, 2023, IP Radian, LLC filed an Emergency Operations Plan (the “Plan”) for the operations phase in Project No. 53385. This Plan supersedes the initial emergency operations plan and is the same Plan attached to IP Radian’s LLC’s Supplemental Emergency Operations Plan Filing.
4. Relevant operating personnel are familiar with and have received training on the Plan, and such personnel have been instructed to follow the Plan except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
5. The Plan has been reviewed and approved by the appropriate executives.
6. Per 16 TAC § 25.53(f), IP Radian, LLC plans to conduct a drill in the first calendar year of commercial operations.
7. The Plan or an appropriate summary of the Plan has been distributed to local jurisdictions as needed.
8. IP Radian, LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
9. IP Radian, LLC 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.



Lucas A. Dunnington
President
IP Radian, LLC

Sworn to and subscribed before me this 29th day of June 2023.



Notary Public, State of Texas
My Commission Expires:

