

## **Filing Receipt**

Filing Date - 2023-06-30 02:49:09 PM

Control Number - 53385

Item Number - 1540



Loraine Windpark Project, LLC, 442 CR 446, Loraine, TX 79532 Office (325) 737-2012 ● Fax (325) 737-2066

June 30, 2023

#### VIA ELECTRONIC FILING

Re: PUC Project No. 53385 -- Loraine Windpark Project, LLC; Power Generation Company Registration No. 20247 - Emergency Operations Plan

#### To Whom It May Concern:

Loraine Windpark Project, LLC (LWP) files this update to its Emergency Operations Plan and record of emergency drill and the affidavit required by 16 TAC § 25.53(c)(3)(B). LWP also files an Executive Summary, record of distribution, and emergency contact list in the format required by 16 Texas Administrative Code (TAC) § 25.53(c) to support its confidential Emergency Operations Plan previously provided to ERCOT.

The record of distribution and emergency contact list are submitted as confidential for security purposes. The confidential portions of the plan itself have been provided to ERCOT as confidential information.

Thank you,

/s/ Julian Palmer
Julian Palmer
Loraine Windpark Project, LLC
Chief Financial Officer

#### AFFIDAVIT OF LORAINE WINDPARL PROJECT, LLC

## STATE OF FLORIDA § COUNTY OF PALM BEACH §

ON THIS DAY, JULIAN PALMER, APPEARED BEFORE ME, the undersigned authority, who, after being duly sworn, stated under oath that he is entitled to make this Affidavit, and that the statements contained below are true and correct to the best of his knowledge.

- I, Julian Palmer am Chief Financial Officer for Loraine Windpark Project, LLC (LWP), a Public Utility Commission of Texas (Commission or PUC) a Power Generation Company (PGC) with certificate number 20247. I have binding authority over the PGC operations.
- 2. This affidavit is being submitted with LWP's Emergency Operations Plan (EOP) as required by 16 TAC § 23.53(c)(4)(C)(i)-(vi) (aka P.U.C. Subst. R. § 25.35(c)(4)(C)).
- Contained herein is LWP's EOP titled TPW-HSE-201 Emergency Preparedness & Response document as required by P.U.C. Substantiative Rule § 25.53.
- 4. All relevant personnel of LWP are familiar with and have received training on the applicable contents and execution of LWP's EOP, and have been instructed to follow the applicable portions of LWP's EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.
- 5. LWP's EOP has been reviewed and approved by all appropriate LWP executives.
- 6. LWP will conduct drills as required by, and relevant to, 16 TAC § 25.53(f).
- 7. LWP's EOP and/or Executive Summary has been distributed to local jurisdictions as needed.
- 8. LWP has a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
- LWP's designated personnel to interact with local, state, and federal emergency management officials has received the IS-100, IS-200, IS-700, and IS-800 NIMS training.
- 10. A complete copy of LWP's EOP has been filed at the PUC with all confidential portions removed, pursuant to the 16 TAC § 23.53(c)(1)(ii).

- 11. LWP has not made any changes to the EOP that was submitted to ERCOT in its entirety pursuant to 16 TAC § 23.53(c)(1)(C), including all confidential, PROTECTED INFORMATION, that would materially affect how LWP responds to an emergency. Such confidential information and materials contained on the EOP provided to ERCOT are confidential by law, trade secrets, specific commercial and financial information, proprietary, economic development negotiation information, highly-confidential, commercially-sensitive, intellectual property, and/or confidential because it involves security matters and measures that involve the security of our company, the State of Texas, and the United States of America, including homeland security.
- 12. The confidential LWP EOP is for the sole use of the intended recipient(s) and contains confidential and privileged information. Any unauthorized review, copy, use, disclosure, or distribution is strictly prohibited. The unredacted version of this EOP is not intended to be subject to any disclosure.

Julian Palmer

Loraine Windpark Project, LLC

Chief Financial Officer

Signed before me on this

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## Loraine Windpark Project Emergency Preparedness & Response Executive Summary

The Loraine Windpark Project Emergency Preparedness & Response (EPR) (also referred to as the Emergency Operating Plan "EOP")was created to prepare for and provide guidance to site personnel and off-site emergency responders in the event of an emergency. These emergencies include naturally occurring as well as those caused by individuals. The EPR Identifies roles among site personnel as well as responsibilities that may be required of each role. The EPR contains functional sections (Checklists), hazard specific sections and appendices to assist personnel prior to, during and after an emergency. The EPR is to be distributed and understood by all site personnel as well as local first responder entities for all parties to coordinate and collaborate closely together in response to an emergency.

#### PRIMARY EMERGENCY CONTACT<sup>1</sup>

Kenneth Russell

Site Manager

325-242-5508

russellk@thirdplanetwindpower.com

The EPR is a preparedness document intended to be read and understood as to maintain an emergency response state. Each employee, contractor and first responder is to understand their responsibilities within their given role in the event of an emergency.

The Loraine Windpark Project EPR:

- Identifies roles and responsibilities of all site personnel (TPW-HSE-201, P.1)
- Drives policy and procedure prior to, during and after an emergency (TPW-HSE-201, P.1)
- Identifies and provides prevention information for specific types of emergencies (TPW-HSE-201, P.2-13)
- Identifies and provides response actions to specific types of emergencies (TPW-HSE-201, P.2-13)
- Creates scenarios and provides documentation and instruction to perform emergency drills (TPW-HSE-201, P.14)

<sup>&</sup>lt;sup>1</sup> 16 TAC § 25.53(c)(4)(B).



- Provides guidance for semiannual training provided by HSE (ΤΡW-HSE-201, P.17)
- Provides instruction for business continuity during an emergency event (TPW-HSE-201, P.17)
- Glossary (TPW-HSE-201, P.18)
- Provides list of TPW emergency forms and documents (TPW-HSE-201, P.19)
- TPW-HSE-201-1 Emergency Contact List
- TPW-HSE-201-2 Emergency Drill Report
- TPW-HSE-203-3 Facility Emergency Response Plan (FERP)
- References (TPW-HSE-201, P.19)
- Revisions (TPW-HSE-201, P.1)
- Response flow charts (TPW-HSE-201, P.20-27)

The Facility Emergency Response Plan (FERP) TPW-HSE-203-3 is an appendix to the EPR that provides specific action information at the site level. The FERP:

- Provides logistical information and specific coordinates for site O&M. (TPW-HSE-203-3, P.1)
- Identifies all relevant emergency phone numbers (TPW-HSE-203-3, P.1)
- Identifies primary and backup emergency contact information for site personnel (TPW-HSE-203-3, P.2)
- Provides rally point maps and coordinates (TPW-HSE-203-3, P.3-4)
- Provides a plan to maintain pre-identified supplies for emergency response (TPW-HSE-203-3, P.4)
- Identifies emergency notification system (TPW-HSE-203-3, P.4)
- Provides shelter locations on site (TPW-HSE-203-3, P.4-5)
- Addresses staffing during emergency response (TPW-HSE-203-3, P.6)
- Identifies individual Turbine coordinates (TPW-HSE-203-3, P.7--8)

#### Other annexes and documentation:

- TPW-HSE-507-1 Site inspection checklist
- Cybersecurity Annex (Low Impact Cyber Security Policy)
- Warm weather preparation (warm weather emergency prevention) (τρω-нsε-403)
- Cold weather preparation (cold weather emergency prevention) (TPW-HSE-405)
- TPW pandemic policy (TPW Pandemic Plan 02-04-2022)
- Physical Security Incident Annex (TPW-HSE-201 Section 5(j), p. 14)
- Restoration of Service Annex (TPW-HSE-201 Section 6(d)(iv) p. 17)
- Communication Plan (TPW Communication Plan)
- Water Shortage Annex Not applicable for wind generators
- Hurricane Annex Not applicable as site is not located within a hurricane evacuation zone





TPW-HSE-201 -Emergency Prepared



TPW-HSE-203-3 -Facility Emergency R



TPW-HSE-201-2 Emergency Drill Rep



TPW-HSE-507-1 -Site Inspection - 4-1



TPW-HSE-201-1 -Loraine Emergency (



Cold Weather Preparation Rev 1 05



Warm Weather Preparation Rev 0 05



TPW-HSE-405 -Cold Injury Prevention - V



TPW-HSE-403 -Heat Stress Prevention



TPW Pandemic Plan - 02-04-2022.doc.rtf



Low Impact Cyber Security 2022.pdf

## Attachment A Record of Distribution

## **Filed Confidentially**



# Attachment B Emergency Contact Information

## **Filed Confidentially**