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BESSP1, LLC - EMERGENCY OPERATIONS PLAN

BESSP1-South Plains Solar Project

Prepared by
[Redacted]

JULY 24, 2023

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1. PURPOSE

This Emergency Operations Plan ("EOP" or "Plan") of BESSP1, LLC ("BESSP1") provides guidance and direction to the Facility with respect to the emergency operations Plan requirements as a Power Generations Company ("PGC") and under Chapter 25 of the Public Utility Commission of Texas ("PUCT") Electric Substantive Rules.

2. EMERGENCY CONTACTS

The following list includes primary and backup emergency contacts for BESSP1 who can immediately address urgent requests and questions from the PUCT during an emergency.

2.1. Primary Contacts

[Redacted], Director of Operations, [Redacted], [Redacted]

[Redacted], Senior Vice President, [Redacted], [Redacted]

[Redacted], General Counsel, [Redacted]

2.2. Backup Contacts

[Redacted], Renewable Technical Manager, [Redacted], [Redacted]

[Redacted], Director of Product Management, [Redacted], [Redacted]

3. APPROVAL AND IMPLEMENTATION

This Plan covers all in-scope Chapter 25 – Subchapter C. – Infrastructure and Reliability requirements and applies to the Facility described below:

a. BESSP1 is a 4.375 MW_{AC} ("Facility") solar Facility located in Lubbock County, Texas. BESSP1 intends to commence commercial operations on August 15, 2023, and is interconnected to South Plains Electric Cooperative's 12.47 kV distribution electric system, located in the Southwest Power Pool ("SPP") footprint. Bluestem Energy Solutions, LLC ("Bluestem") is the Generator Operator ("GOP") and the Operations and Maintenance Manager ("O&M") for the Facility.
b. This Plan governs emergency operations procedures generally and outlines additional emergency procedures specific to various scenarios as detailed in the attached annexes.
c. BESSP1 understands and affirms that corporate and Facility management will play an important role in maintaining an effective EOP. It is the responsibility of all personnel to exercise good judgement in the performance of this Plan.

Any questions regarding this Plan should be directed to the BESSP1 Compliance Manager.

3.1. EOP Maintenance, Implementation, and Revision

Pursuant to 16 TAC § 25.53(d)(1)(B), the following employees are responsible for maintaining and implementing the EOP, as well as those who may change the EOP. Further job responsibilities related to emergency operations are additionally outlined in Section 5.0 of this EOP.

Title	Authority
[Redacted], General Counsel	Change EOP
Bluestem Energy Solutions, LLC	
[Redacted]	
[Redacted], Director of Operations	Maintain and Implement EOP
Bluestem Energy Solutions, LLC	
[Redacted]	
[Redacted], Senior Vice President	Maintain and Implement EOP
Bluestem Energy Solutions, LLC	
[Redacted]	

3.2. Revision Control Summary

Pursuant to 16 TAC§ 25.53(d)(1)(D), BESSP1 affirms that as of August 15, 2023, this document serves as the current EOP.

Rev.	Date	Description	Made By
0	8/15/23	Initial Filing	[Redacted]
1			
2			

3.3. Date of Approval

Pursuant to 16 TAC§ 25.53(d)(1)(E), BESSP1 affirms that the current EOP was approved on July 24, 2023.

4. ROLES AND RESPONSIBILITIES

4.1. BESSP1 Compliance Manager

Role: The BESSP1 Compliance Manager of this Plan and General Counsel for Bluestem.

Responsibilities include:

a. Ensure completion of all required reporting (PUCT, etc.) within the specified timeframes.
b. Oversee the development and implementation of this Plan. Ensure the Plan is up-to-date and aligns with BESSP1 business objectives and addresses requirements.
c. Oversee revisions and updates to the Plan as necessary, as well as the implementation of the revised Plan, and review of supporting documents, as needed.
d. Participate in training, drills, and exercises as appropriate.
e. Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
f. Ensure the activities documented in the Plan are complete, in concert with the Operations Manager.
g. Reviews and approves this Plan annually.
h. Maintains evidence.

4.2. BESSP1 Operations Manager

Role: The Manager of the team contracted to perform the O&M services at the Facility and operates the Facility from the Bluestem Energy Solutions office.

Responsibilities include:

a. Ensure the requirements and processes laid out in the Plan are followed by site personnel.
b. Lead field services in the execution of this Plan and set expectations with field service technicians for safe and reliable operational performance of the Facility, as detailed in the Plan.
c. Participate in the development, administration, execution, and update of the Plan.
d. Oversee the day-to-day operation of the Facility.
e. Ensure annual drill requirements are met and submit evidence to BESSP1 upon completion and request.
f. Ensure Plan training is completed by all relevant personnel and submit evidence to BESSP1 upon completion and request.
g. Participate in training, drills, and exercises.
h. Provide evidence to BESSP1 Compliance Manager upon completion and request.
i. Responsible for responding to and managing emergencies to ensure the continuity of operations.

j. Coordinate with Field Personnel and create appropriate log entries for events and incidents.
k. Participate in post-incident reviews.

5. COMMUNICATION PLAN

5.1. Communication with the Media

Media inquiries are handled by Bluestem Energy Solutions Director of Product Management who can be reached at: [Redacted]

a. Plant personnel shall not make statements to, nor answer questions from the media. Any questions directed to them, on or off the site, are to be referred to Bluestem Energy Solutions Director of Product Management.
b. A single location will be designated for the formation of escorted tours to visit areas of interest that are secure and approved by the Operations Manager for observation. Unauthorized persons are not allowed onto the site until the emergency situation has been stabilized. It is extremely important that the plant entrance be kept clear for emergency response vehicles.
c. Since the media monitors the emergency radio frequencies, an emergency event may attract the media. Immediately notify the Operations manager, who can coordinate arrangements for a qualified spokesperson to release a press statement.

5.2. Communication with the PUCT

[Redacted], General Counsel, and [Redacted], Director of Operations, Bluestem Energy Solutions are listed as primary and back-up personnel for PUCT to contact during an emergency.

a. Any communication with PUCT shall be done through the contacts identified above. Any communication should include a log of the date, time, identity of who was spoken with, and a description of the communication and any information relayed to the entity.

5.3. Communication with OPUC

[Redacted], General Counsel, and [Redacted], Director of Operations, Bluestem Energy Solutions are listed as primary and back-up personnel for OPUC to contact during an emergency

a. Plant personnel shall not make statements to, nor answer questions from OPUC. Any questions directed to them, on or off the site, are to be referred to Bluestem Energy Solutions General Counsel or Director of Operations.

5.4. Communication with Fuel Suppliers

As a PV generation Facility with no fuel source, this does not apply.

5.5. Communication with Local and State Governmental Entities, Officials, and Emergency Operations Centers

[Redacted], General Counsel, and [Redacted], Director of Operations, Bluestem Energy Solutions will represent BESSP1 in communications with local and state governmental entities, officials, and Emergency Operations Centers.

a. Communication with the local government entities, state governmental entities, and the state emergency operations centers should be done through Bluestem Energy Solutions General Counsel and Director of Operations. Communications shall be logged into the sites daily log.

5.6. Communication with ERCOT

This Facility is not located in the ERCOT territory. Therefore, this section is not applicable.

6. PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

BESSP1 has identified the following potential critical failure points and associated supplies necessary to address the issues arising in an emergency response. BESSP1 has planned remediation for each item, as noted.

Item	Quantity	Description
First Aid Kit	One (1)	Ensure the first aid kit in the storage container is fully stocked. Technicians are required to have first aid kits as well.
Portable Water	5 gallons	Ensure storage container is fully stocked
Equipment Spare Parts Inventory for Facility Operation		
1650 kVA 12.47/0.600 kV Transformer	One (1)	Ensure that preventative maintenance is completed, and spares are available.

Chint 125kW Inverters	Five (5)	Ensure that preventative maintenance is completed, and spares are available.
VSUN550 PV modules	Fifty (50)	Ensure that preventative maintenance is completed, and spares are available.
ET385-M672BH-GL PV modules	Ten (10)	Ensure that preventative maintenance is completed, and spare parts are available.

7. PLAN TO ADDRESS STAFFING DURING EMERGENCY RESPONSE

BESSP1 has identified the potential site and control center critical failure points in this Plan and has planned remediations for each role, as noted. There will be no additional staffing prior to or during severe weather events/conditions, but BESSP1 is able to mobilize managers and/or contractors as needed.

Operations Manager	One Full-time Operations Manager Offsite
Contractors	Multiple contractors are available to visit the site as needed.

8. SEVERE WEATHER PLANNING/IDENTIFICATION AND PROCESS FOR EOP ACTIVIATION

Severe weather can negatively impact the Facility. Events and disturbances that can occur in and around the Facility include but are not limited to windstorms, tornados, severe lightning storms, flooding, excessive heat, excessive cold, snowstorms, and ice storms.

Note that the nature of the solar facilities is such that if there is no irradiance, the Facility will shut down energy production, therefore output during some seasonal weather events is reduced or terminated. Post-event, the Operations Manager or contractors will assess the damage and report all damage to the Operations Manager and all operating personnel at BESSP1.

8.1. Preseason Planning

Ahead of each summer and winter season the Operations Manager will ensure that the appropriate weatherization plan is reviewed and that pre-season inspections are completed. For event response checklists relating to other scenarios, see the appropriate attachment included in this Plan.

8.2. Identifying Weather Hazards

Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather radios. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Operations Manager and operating personnel are responsible for keeping abreast of forecasted severe weather events.

a. Internet access to weather websites
b. Onsite weather radio
c. AM/FM radio

When contractors receive information that severe weather has been issued for the Facility area, they will notify the Operations Manager. The Operations Manager or operating personnel shall decide whether the Facility should be shut down.

8.3. Weather Condition Thresholds for Activating The EOP

The Emergency Operations Plan will be activated when certain weather conditions are met through either broadcasted severe weather alerts or via data collected at the Facility.

8.3.1. Windstorms, Tornadoes, and Hurricanes

Any wind or severe weather alert indicating current or future wind speeds of 50 mph can prompt the operating personnel to activate the EOP.

8.3.2. Lightning Storms

Upon receiving a broadcast weather alert or visual identification of lightning in the area.

8.3.3. Flooding

Upon receiving broadcast flood alerts or experiencing flooding in and around the Facility. Secondarily, the EOP can be activated during heavy rain events if the Operations Manager or operating personnel believe flooding may occur.

8.3.4. Excessive Heat

Upon receiving broadcast excessive heat alerts.

8.3.5. Excessive Cold, Snowstorms, and Ice Storms

Upon receiving broadcast weather forecasts that predict temperatures getting below 0 degrees Fahrenheit or when temperatures reach 0 degrees Fahrenheit or colder at the Facility.

8.4. Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the spare parts storage container, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the Facility and maintain communications with the Operations Manager and operating personnel.

8.5. Evacuation Zone

Per the Texas Department of Emergency Management (TDEM), the Facility is in the TDEM evacuation zone.

9. RESTORATION RESPONSE TIME

In the event of a power outage, the site will not be able to generate solar power until the breaker that protects the Facility is closed in by South Plains Electric Cooperative.

10. REQUIRED EMERGENCY OPERATIONS PLAN TESTING

10.1. Requirement for an Annual Drill

The PUCT requires that BESSP1 conduct or participate in one or more drills annually to test its emergency procedures if its emergency procedures have not been implemented in response to an actual event within the last 12 months.

10.2. Testing

This Plan is tested at least once every 12 months to validate the contents and procedures outlined. Testing may be accomplished by either of the following:

a. Responding to an actual event in the preceding 12 months (i.e., since the last drill or event); or
b. By Conducting a planned drill.

EOP drills must follow the Plan. The Operations Manager will ensure that a drill occurs annually. Upon completion of the drill, the Operations Manager will provide evidence of completion to the Compliance Manager.

10.3. Drill Requirements

10.3.1. PUCT Requirements

a. BESSP1 must conduct or participate in at least one drill each calendar year to test this EOP.
b. Following an initial drill, BESSP1 must assess the effectiveness of its emergency response and revise its EOP as needed.
c. If BESSP1 operates in a hurricane or evacuation zone as defined by TDEM, at least one of its annual drills must include a test of Its hurricane annex.
d. At a minimum of one drill per year, BESSP1 must notify Commission staff, 30 days prior to conducting an annual drill, of the date, time, and location of said event via the method and form prescribed on the commission's website. BESSP1 must also give 30-day notice of the date, time, and location of the drill to the appropriate TDEM District Coordinators via email or other written form.
e. If BESSP1 has activated its EOP in response to an emergency, it is not required to conduct or participate in a drill in the calendar year in which the EOP was activated.

10.3.2. Other Requirements

a. The content of each drill will be based on current needs and will be determined by the Operations Manager with input from the Compliance Manager, as needed.
b. The annual drill must include a documented evacuation of the Facility.
c. A roster of drill attendees and the date the drill was conducted will be filed with this Plan and retained in the BESSP1 document repository.
d. If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provided to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

10.4. EOP Updates

a. Following the annual drill, the effectiveness of the drill and this Plan will be assessed and updated, as needed, based on feedback received and provided to the Compliance Manager by the Operations Manager.
b. Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this Plan) and filed with the BESSP1 EOP evidence.

11. ANNNUAL TRAINING AND PLAN REVIEW

All personnel (inclusive of appropriate BESSP1 representatives, O&M personnel, and operating personnel) shall receive training on this EOP whenever it is modified or on at least an annual basis. Employees will also be trained when this Plan is initially implemented.

12. EMERGENCY CONTACT INFORMATION

BESSP1 is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, BESSP1 must provide the updated information to the Commission within 30 days by submitting an Emergency Contact Information Update form.

13. REQUIRED ANNUAL REPORTING

13.1. Requirement to File Updated EOP to PUCT

The PUCT requires that BESSP1 file an updated version of this Plan by March 15, annually.

13.2. ERCOT Nodal Protocol Requirements

This Facility is not located in ERCOT jurisdiction therefore it is not subject to this requirement.

14. RESOURCES AND RELATED REFERENCES

14.1. Public Utility Commission of Texas

Electric Substantive Rules: Chapter 25 Rules webpage

webpage: https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

Section 25.53 – Electric Service Emergency Operations Plans

webpage: https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.23.pdf

Emergency Contact Annual Report Form

webpage: https://ouc.texas.gov/ind_ustry/electric/forms/emcont/EC_Forms.aspx

National Oceanic and Atmospheric Administration (NOAA)

webpage: https://www.noaa.gov

National Weather Service

webpage: https://www.weather.giv

Ready.gov – Disasters and Emergencies webpage: list of event type and response actions

webpage: https://www.ready.gov/be-informed

ATTACHMENT 1: DESIGNATION OF EMERGENCY COORDINATORS

The BESSP1 Emergency Coordinator is responsible for specific actions detailed in the Plan. Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

Primary Emergency Coordinator	Title: Director of Operations, Bluestem Energy Solutions
	Phone Number: [Redacted]
	Name: [Redacted]
Alternate Emergency Coordinator	Title: Senior Vice President, Bluestem Energy Solutions
	Phone Number: [Redacted]
	Name: [Redacted]

ATTACHMENT 2: EMERGENCY CONTACTS

In the event of a fire emergency, medical emergency, police emergency or weather-related emergency, ensure that the following roles are notified after emergency responders are contacted.

Compliance Manager	[Redacted]	[Redacted]
Operations Manager	[Redacted]	[Redacted]

ATTACHMENT 3: GENERAL EMERGENCY PROCEDURE

BESSP1 Location for Outside Emergency Responders

Facility is located at: **6904 FM 1294-CR 5900 Shallow Water, Texas 79363**

General Emergency Procedures

This Plan was developed for the following plausible contingences that could transpire at the Facility:

1. Personnel injuries and serious health conditions
2. Fires
3. Chemical releases
4. Weather-related causes
5. Threats to the Facility that warn of danger to personnel.
6. Pandemics
7. Sabotage reporting
8. Other unanticipated events

It will be the responsibility of the Operations Manager or the on-site contractor to assess a developing emergency and initiate the appropriate actions in the Plan to protect personnel, the surrounding environment, and Facility equipment from adverse damage.

If the event is a fire, medical, or police emergency, contact 911 immediately

General Emergency Protocols

1. Any work-related permits in effect shall be immediately voided, and personnel involved in such work shall cease all activities onsite.
2. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.
3. Based upon the type and extent of the emergency, the contractor/technician should assess whether an evacuation should be initiated. The following criteria should be considered in rendering a decision to conduct an evacuation of the Facility.

a. The affected parts of the Facility and severity of the emergency.
b. Restrictions in egress routes caused by the emergency.
c. Wind direction
d. People currently located at the Facility.

4. If the Operations Manager or technician/contractor determines that a Facility evacuation is necessary, he or she must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

a. Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency that is serious enough to warrant immediate evacuation of all personnel. **In this type of evacuation, operating personnel should evacuate without regard for shutdown of Facility systems or for placing Facility systems in the safest mode.** This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

b. Delayed Site Evacuation

This type of evacuation would be in a serious emergency situation where non-essential personnel are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the Facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the Facility. The Operations Manager and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in Facility operating areas to perform a controlled shutdown of the Facility. **If personnel are not exposed to unnecessary danger to perform Facility shutdown and/or place the Facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.**

***Note**: Although the Operations Manager or technician/contractor may initially designate an evacuation to be a Delayed Site Evacuation, he or she should always keep in mind that conditions may change rapidly and result in the need to call for an Immediate Site Evacuation.

5. The Operations Manager or technician/contractor onsite will determine if an evacuation is necessary.
6. Evacuation will be coordinated via cell phone. Teams will be alerted if an evacuation has been directed. If an evacuation has been directed, the Operations Manager or technician/contractor shall

ensure that instructions for evacuation are communicated to personnel over the phone or by simply speaking it to them directly. These instructions should include the following items at a minimum.

a. The type of evacuation to be performed
b. The nature of the emergency
c. The location(s) of the emergency
d. Any egress routes that should not be used by evacuating personnel.

7. If an evacuation has been ordered, personnel shall follow either the **Immediate Site Evacuation Procedures or Delayed Site Evacuation Procedures** contained in **Attachment 4,** as appropriate, and based upon the direction of the Operations Manager, lead Site Technician and/or Facility Emergency Coordinator.
8. Perform the appropriate follow-up procedures below, based upon the type of emergency that is occurring.
    a. Personnel Injuries/Health Conditions
    b. Fire
    c. Chemical/Oil Spills and Releases
    d. Weather-related Emergencies

ATTACHMENT 4: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although Facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders.

Basic First Responders Actions

1. Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
2. If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring an AED to the scene if one is available.
3. Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
4. If no pulse is observed, complete CPR. Assisted breathing and chest compressions should be commenced.
5. If CPR is being performed and an AED arrives at the scene, direct an assistant to begin setting up the AED for operation on the victim. CRP should be continued during the time that the AED is being setup.
6. If the AED is placed into operation, remain near the victim, and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
7. If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
8. If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, do not attempt to move the victim. Make the victim as comfortable as possible and apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.
9. Immobilize all injured parts of the victim.
10. Prepare the victim for transportation if the victim can be safely moved.

Physical Shock

Symptoms

1. Pallid face
2. Cool and moist skin.
3. Shallow and irregular breathing
4. Perspiration appearing on the victims upper lip and forehead
5. Increase, but faint pulse rate.
6. Nausea
7. Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

1. Request professional medical aid immediately.
2. Remain with and attempt to calm the victim.

Electric Shock

Symptoms

1. Pale bluish skin that is clammy and mottled in appearance.
2. Unconsciousness. No indications that the victim is breathing.

Treatment

1. Turn off electricity if possible.
2. Call for professional medical assistance and an ambulance immediately.
3. Remove electric contact from victim with non-conducting material.
4. Perform CPR and call for an AED, if required and available.

Burns

Symptoms

1. Deep red color; or
2. Blisters, or
3. Exposed flesh.

Treatment

1. Cooled immediately if possible, and

2. Free of any jewelry or metal if it is safe to remove it.
3. Do not pull away clothing from burned skin tissue.
4. Do not apply any ointment to the burn area.
5. Seek professional medical assistance as soon as possible.

ATTACHMENT 5: SABOTAGE REPORTING

1. **Dial 911**
2. Communicate the sabotage event to all on-site personnel.
3. Contact Operations Manager to report the sabotage and coordinate reporting.

PHYSICAL SECURITY INCIDENT ANNEX

Fire Response Plan

The Facility maintains this fire response Plan which describes measures taken at the Facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of Facility personnel and minimize damage to Facility equipment and the surrounding environment.

1. Any person who discovers a fire in the Facility should immediately make radio/phone contact with the Operations Manager or technician/contractor, and provide the following information:
    a. That a fire has been discovered.
    b. The location and source of the fire.
    c. Any injuries that have occurred.
    d. The cause of the fire
    e. Actions he/she will be taking to extinguish the fire.
2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire is in its incipient stage if it meets two primary criteria:
    a. The fire can be extinguished or controlled with a single portable fire extinguisher; and
    b. The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
3. If the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire.
4. In response to the fire, the technician/contractor will need to make the following determinations:
    a. The equipment or activities that need to be shut down and/or ceased.
    b. If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

Fire Extinguisher Deployment Plot – Admin/Water Treatment Areas

BESSP1 has the following Fire Extinguishers onsite:

- One (1) dry chemical fire extinguisher located in the spare parts building.

Chemical or Oil Spills and Release

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of BESSP1 that all Facility personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For clarification to Facility personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release.
2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area.
3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Operations Manager or technician/contractor should be notified immediately. Information provided should include all the followings that are known:
    a. What type of chemical has been spilled/released?
    b. The location(s) of the spill/release.
    c. If the source of the spill/release has been stopped.
    d. If any injuries or chemical exposure has occurred to personnel.
    e. Boundaries describing the area of the spill.
    f. Whether or not the spill is contained.
    g. Quantity released.
    h. Environmental Impacts.
4. Based upon the report from the person discovering the spill, the Operations Manager or Technician/Contractor shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. **If a threat is imposed to the community or environment, 911 should be notified immediately.**
5. The Operations Manager or technician/contractor shall decide as to whether the spill/release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the

Operations Manager or technician/contractor shall use the Spill Prevention Control and Countermeasure Plan. The Operations Manager shall ensure that all required notifications are made.

6. While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any Facility drains that are near the location of the spill, if it is safe to do so.
7. The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off the safe boundaries around the spill to avert others from inadvertently approaching the spill area, if it is safe to do so.
8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.

Threats to the Facility

In the event the site receives threating correspondence either by phone or by other means of communications, the following actions should be performed immediately:

Actions by the person receiving the threat:

1. Gather as much information as possible from the person making the threat. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted. If the threat is being made verbally, communicate, and obtain information from the individual making the threat for as long as possible.
2. Inform the Operations Manager of the situation.

The Operations Manager may consider any or all the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

1. Order an evacuation of the Facility.
2. Call 911
3. Arrange for additional security personnel for the Facility.
4. Direct Facility personnel to commence a controlled shutdown of the Facility.
5. Direct searches to be performed on vehicles entering the Facility.

HURRICANE ANNEX

As per the Texas Department of Emergency Management (TDEM), the Facility is not in a TDEM evacuation zone. http://ftp.dot.state.tx.us/pub/txdot-info.trv/evacuation/all-districts.pdf

Immediate Site Evacuation Procedure

1. Personnel present on-site shall immediately take the following actions:
    a. Gather at the front entrance gate at Facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency.
    b. Once the personnel have gathered, they shall immediately proceed to a designated gathering area.
    c. Upon arriving at the designated gathering area, the group shall designate a person in charge and take a head count of all personnel who are at the gathering area, including contractors and visitors. If all personnel aren't accounted for, the person in charge shall notify the Operations Manager.
    d. All personnel at the gathering location shall remain at the location until an "ALL CLEAR" signal has been given, the "ALL CLEAR" signal will be communicated by cellular telephone.

RESTORATION OF SERVICE ANNEX

1. Identify any physical damage to the generating Facility.
2. Electrically isolate the generating Facility and review the Facility operating logs.
3. Operating personnel to report back to generating Facility owner and utility about the current status of the Facility and timelines to bring the Facility back online.
4. Operating personnel and generating Facility owner to determine whether the Facility will need to remain completely offline until fix is completed, or if the generating Facility can run at a reduced capacity. These individuals will work with the utility and transmission provider to determine any safety issues that need to be considered.
5. Once a plan is agreed to, the utility provider will be provided with an updated timeline as to when the site will be brought back up to full production capacity.

WEATHER EMERGENCY ANNEX

There are no items distinct from the weather preparations required under §25.55 (Winter Season Preparations & Summer Season Preparations)

a. There is no fuel switching equipment.
b. There are no updates needed for the checklist used in the winter or summer weather readiness plan.

PANDEMIC AND EPIDEMIC ANNEX

Listed below are the overarching organizational planning assumptions

1. Federal, state, and local government will provide guidance and/or direction regarding current pandemic status.
2. BESSP1 will evaluate all available information published during a pandemic to determine appropriate response and actions.
3. The Facility will be accessible, but the right of entry may be limited to essential personnel.
4. Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.
5. Travel restrictions, such as limitations on mass transit, implemented at the federal, state, tribal, territorial, and local levels may affect the ability of some staff to report to work.

WATER SHORTAGE ANNEX

This is not applicable to the Facility since the generating Facility utilizes sunlight as its power source. The Facility does not utilize water as a power source.

CYBER SECURITY ANNEX

Access Control

Access is granted based on the principle of least privilege and whether the individual has a business requirement to access the equipment. All access is documented, and security policies are applied prior to entry into cyber infrastructure.

Threat Intrusion

1. Intrusion Identification and Protection:
    a. Determine threat actor intrusion method
    b. Lockdown and isolate all affected systems as necessary
    c. Alert authorized field personnel of possible field deployment
2. Intrusion Detection and Response:
    a. Determine best course of action and possible resolutions based on threat vector
    b. Deploy resolution to all affected devices
    c. Inform field personnel of next steps
    d. Continue monitoring the network for additional intrusions
3. Intrusion Recovery:
    a. Revert any temporary solutions
    b. Determine the extent of damage the intrusion
    c. Deploy any final resolution patches
    d. Document incident response and implement solutions