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PROJECT NO. 53385

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

MIDWAY BESS STATION, LLC'S EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, Midway files this executive summary of its emergency operations plan ("EOP"). This executive summary describes the contents and policies contained in the EOP, includes references to specific sections and page numbers of the EOP that correspond with the requirements of 16 TAC § 25.53, and includes a record of distribution. This filing also includes a redacted copy of the EOP and the required affidavit.

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

Attachment A to this Executive Summary is a redacted copy of Midway's EOP. The purpose of the EOP is to provide general guidelines for identifying and responding to emergency events at the Midway battery energy storage system ("BESS") site.

The EOP contains the following sections:

Description	EOP Reference
Introduction	Section 1, page 1
Applicability	Section 2, page 1
Approval and Implementation	Section 3, page 1
Revision Control Summary	Section 4, page 1
Reporting Requirements	Section 5, page 2
Training	Section 6, page 2
Record of Distribution	Section 6.1, page 2; Appendix C
Annual Drills	Section 6.2, page 2
Communication Plan	Section 7, page 3
24/7 Monitoring Service	Section 7.1, page 3
External Communications	Section 7.2, page 3
Emergency Response Contact Information Sheet	Section 7.3, page 3

Description	EOP Reference
Pre-Identified Supplies for Emergency Response	Section 8, page 3
Emergency Response Staffing	Section 9, page 4
Identification of Weather-Related Hazards	Section 10, page 4
Weather-Related Emergencies	Section 11, page 4
Extreme Cold	Section 11.1, page 4
Extreme Heat	Section 11.2, page 5
Flooding	Section 11.3, page 5
Tornadoes	Section 11.4, page 6
Hurricanes	Section 11.5, page 6
Water Storage	Section 12, page 6
Restoration of Service	Section 13, page 6
Pandemic or Epidemic	Section 14, page 6
Cyber Security	Section 15, page 7
Physical Security	Section 16, page 7
Fire	Section 17, page 7
Conditions Associated with Energy Storage Systems	Section 17.1, page 7
Response to a Fire Incident	Section 17.2, page 8
Fuels	Section 18, page 11
Equipment Weatherization	Section 19, page 11
Emergency Response Contact Information Sheet	Appendix A, page 12
Site Information	Appendix B, page 14

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

The record of distribution is provided for in Section 6.1 and Appendix C of the EOP. Midway will file a supplement with the completed record of distribution at a later date.

C. 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).

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

Appendix A contains the EOP's emergency contact information required by 16 TAC § 25.53(c)(4)(B).

The primary and backup emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency are identified in Section 7.2, page 3. Their names and contact information will be provided in the confidential filing.

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

The EOP addresses common operational functions relevant across emergency types, including:

Description	EOP Reference
Training	Section 6, page 2
Communication Plan	Section 7, page 3
Pre-Identified Supplies for Emergency Response	Section 8, page 3
Emergency Response Staffing	Section 9, page 4
Restoration of Service	Section 13, page 6
Emergency Response Contact Information Sheet	Appendix A, page 12
Site Information	Appendix B, page 14

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

Description	EOP Reference	Rule Reference
Introduction of EOP and outline of its applicability	Sections 1-2, page 1	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the EOP, and those who can change the EOP	Section 3, page 1	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change	Section 4, page 1	16 TAC § 25.53(d)(1)(C)

Description	EOP Reference	Rule Reference
made to the EOP since the initial EOP filing requirement		
Dated statement that the current EOP supersedes previous EOPs	Section 2, page 1	16 TAC § 25.53(d)(1)(D)
Date the EOP was most recently approved	Approved Date in header	16 TAC § 25.53(d)(1)(E)

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

Midway's communication plan is provided in Section 7, page 3 of the EOP. Section 7.2 describes the procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator. Because the BESS does not consume fuels, the procedure to communicate with fuel suppliers is not applicable to Midway.

H. Emergency Supply Plan (16 TAC § 25.53(d)(3))

Section 8, page 3 describes Midway's plan to maintain pre-identified supplies for emergency response.

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

Section 9, page 4 describes Midway's plan to address emergency response staffing.

J. Weather Related Hazards (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))

Sections 10-11.5, pages 4-7 include Midway's plans for identifying, monitoring, and responding to weather events as outlined below:

Description	EOP Reference	Rule Reference
Identification of Weather-Related Hazards	Section 10, page 4	16 TAC § 25.53(d)(5)
Weather-Related Emergencies	Section 11, page 4	16 TAC § 25.53(d)(5)
Extreme Cold, including • operational plans for responding to a cold weather emergency distinct from the weather preparations required under 16 TAC § 25.55 and	Section 11.1, page 4	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)

Description	EOP Reference	Rule Reference
• checklist for generation resource personnel to use during a cold weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency		
Extreme Heat, including • operational plans for responding to a hot weather emergency distinct from the weather preparations required under 16 TAC § 25.55 • checklist for generation resource personnel to use during a hot weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency	Section 11.2, page 5	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)
Flooding	Section 11.3, page 5	16 TAC § 25.53(d)(5)
Tornadoes	Section 11.4, page 6	16 TAC § 25.53(d)(5)
Hurricanes	Section 11.5, page 6	16 TAC § 25.53(d)(5)

As stated in Section 18, page 11, the EOP does not include a verification of the adequacy and operability of fuel switching equipment, because the BESS does not consume fuels. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply to Midway.

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

As stated in Section 12, page 6, the EOP does not include a water shortage annex, because the Midway BESS site does not rely on water to generate electricity. Therefore, 16 TAC § 25.53(e)(2)(B) requiring a water shortage annex does not apply to Midway.

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

Section 13, page 6 describes the plans to re-energize the Midway project.

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

Section 14, page 6 addresses Midway's pandemic and epidemic emergency response plan.

N. Hurricane (16 TAC §§ 16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(E))

As stated in Section 11.5, page 6, the Midway BESS site is not located in a hurricane evacuation zone. Therefore, 16 TAC § 25.53(d)(5) requiring a plan that addresses how an entity identifies hurricanes and 16 TAC § 25.53(e)(2)(E) requiring a hurricane annex does not apply to Midway.

O. Cyber Security (16 TAC § 25.53(e)(2)(F))

For the Cyber Security annex, refer to the Fractal EMS Cyber Security Overview attached to the Executive Summary as Attachment C.

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

Section 16, page 7 contains Midway's physical security annex.

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

The following table shows the additional annexes that are appropriate for Midway's BESS site:

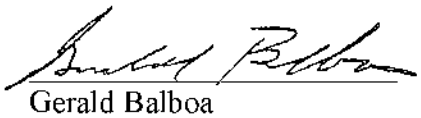
Description	EOP Reference
Fire	Section 17, page 7
Conditions Associated with Energy Storage Systems	Section 17.1, page 7
Unique Challenges	Section 17.1.1, page 7
Fire and Water	Section 17.1.2, page 8
Response to a Fire Incident	Section 17.2, page 8
Fire External to Battery Container or Enclosure	Section 17.2.1, page 9
Fire Internal to Battery Container or Enclosure	Section 17.2.2, page 9

Description	EOP Reference
After a Fire	Section 17.2.3, page 11
Equipment Weatherization	Section 19, page 11
Emergency Response Contact Information Sheet	Appendix A, page 12
Site Information	Appendix B, page 14

R. <u>Drills (16 TAC § 25.53(f))</u>

Midway plans to conduct a drill on the EOP by December 31, 2023.

Respectfully Submitted,



Gerald Balboa
Vice President
Midway BESS Station, LLC

Attachment A

Midway BESS Station, LLC's
Emergency Operations Plan
Approved: August 1, 2023

TABLE OF CONTENTS

Midway BESS Station, LLC's
Emergency Operations Plan
Approved: August 1, 2023

1. Introduction

This Emergency Operations Plan ("EOP") addresses how Midway BESS Station, LLC ("Midway") plans to respond in the event of an emergency at its battery energy storage system ("BESS") site. The site information is provided in Appendix B to this EOP. Fractal EMS LLC ("Fractal") is responsible for operations of the Midway project on a day-to-day basis. For purposes of this EOP, "VP of Operations" refers to Fractal's Vice President of Operations. The EOP was prepared in accordance with 16 Texas Administrative Code ("TAC") § 25.53.

2. Applicability

The EOP is effective as of the "Approved" date in the header and supersedes all prior versions of the EOP. Relevant portions of the EOP apply to all necessary parties, including contractors who provide services to Midway in connection with its BESS site and visitors to the Midway site.

3. Approval and Implementation

Fractal will be responsible for maintaining and implementing the EOP. Only the VP of Operations may make changes to the EOP, which shall then be reviewed and approved by the VP of Midway. All approved revisions to the EOP shall be documented in the Revision Control Summary provided below.

Fractal will be responsible for distributing a copy of the EOP and any approved revisions of the EOP to all appropriate contractors.

4. Revision Control Summary

Revision No.	Date	Author	Title	Description of Change
1	08/01/2023	[redacted] [redacted]	Business Development VP of Operations	Initial Version

5. Reporting Requirements

Midway will continuously maintain this EOP. If Midway makes a change to its EOP that materially affects how it would respond to an emergency, Midway will file an updated EOP with the Public Utility Commission of Texas ("Commission") no later than March 15 of the following year, as well as the other documentation required by 16 TAC § 25.53(c)(3)(A). If Midway BESS does not make a change to its EOP that materially affects how it would respond to an emergency, Midway will file with the Commission an attestation of no changes no later than March 15 of the following year, as well as the other documentation required by 16 TAC § 25.53(c)(3)(B).

6. Training

All contractors who provide services to Midway in connection with its BESS site, including from Fractal, and visitors to the Midway BESS site will be trained on the EOP. Training will take place prior to the commercial operation date and upon hiring new personnel. A copy of the EOP will also be available on-site at all times.

In addition, the VP of Midway, who is designated to interact with local, state, and federal emergency management officials during emergency events, will be trained on the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

6.1. Record of Distribution

The names of the individuals that have received access to and training on the EOP will be recorded in the Record of Distribution included as Appendix C.

6.2. Annual Drills

Fractal will conduct at least one drill each calendar year to test this EOP. Following the annual drill, Midway /Fractal will assess the effectiveness of the emergency response and revise this EOP as needed. At least 30 days prior to the date of at least one drill each calendar year, Midway will notify Commission Staff using the method and form prescribed by Commission Staff on the Commission's website and the appropriate Texas Division of Emergency Management District Coordinators by email or other written form of the date, time, and location of the drill. In the event that Midway activates its EOP in response to an emergency, it is not required to conduct a drill in the calendar year in which the EOP was activated.

7. Communication Plan

7.1. 24/7 Monitoring Service

The Midway BESS site is unmanned during normal operations with 24/7 remote operations monitoring by Fractal. Fractal serves as the point of contact for all Midway BESS site emergencies, including those that occur outside of normal operating hours.

7.2. External Communications

In the event of an emergency, Fractal will be responsible for all external communications with individuals, agencies, and/or entities, including with the media; the Commission; the Office of Public Utility Counsel; local and state governmental entities, officials, and emergency operations centers as appropriate in the circumstances for Midway; and the Electric Reliability Council of Texas. Because the BESS does not consume fuels, the procedure to communicate with fuel suppliers is not applicable to Midway. All personnel, other than the VP of Midway, shall refrain from communicating with the media.

The following individuals are authorized to address urgent requests and questions from the Commission during an emergency:

Primary Contact:

Backup Emergency Contact:

7.3. Emergency Response Contact Information Sheet

For the site-specific emergency response contact information, refer to Appendix A. The Emergency Response Contact Information Sheet will be posted on-site and at Fractal's Remote Operations Center ("Fractal ROC"). The Fractal ROC 24-hour number is included in the Emergency Response Contact Information Sheet.

8. Pre-Identified Supplies for Emergency Response

Each container at Midway BESS site includes the following emergency response supplies stored inside: a first aid kit and fire extinguisher. In addition, drinking water bottles will be stored on-site.

9. Emergency Response Staffing

The VP of Operations will be responsible for ensuring appropriate staffing in response to an emergency event. Neither Midway nor Fractal will have personnel on-site except to conduct periodic maintenance and during system emergencies or forced outages of the BESS. During a system emergency, the VP of Operations at the Fractal ROC will receive signals from the site indicating an emergency. Depending on the nature and severity of the emergency, the VP of Operations will determine the appropriate response and required staffing.

10. Identification of Weather-Related Hazards

Fractal identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, by remote monitoring. When a weather-related hazard is identified, Fractal will notify all necessary parties, including any on-site personnel. Depending on the circumstances, on-site personnel may be advised to evacuate the premises.

11. Weather-Related Emergencies

The Midway BESS site is unmanned during normal operations with 24/7 remote operations monitoring by Fractal. The Fractal ROC shall notify all potentially impacted on-site personnel of any weather-related emergencies. Midway's Qualified Scheduling Entity ("QSE"), MP2 Energy LLC (SQ1) ("MP2"), will serve as the backup operations center. The contact information for both the primary and backup desks are included in the Emergency Response Contact Information Sheet (Appendix A to this EOP).

11.1. Extreme Cold

In response to a cold weather emergency, personnel shall use the following checklist:

- Ensure communications between Midway project and Fractal cloud platform.
- Ensure communications between Midway project and MP2.
- Ensure all warranty applicable operational metrics are adhered to.
- For Restoration of Service, see Section 13.

This checklist may be revised from time to time based on lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

11.2. Extreme Heat

In response to a hot weather emergency, personnel shall use the following checklist:

- Ensure communications between Midway project and Fractal cloud platform.
- Ensure communications between Midway project and MP2.
- Ensure all warranty applicable operational metrics are adhered to.
- For Restoration of Service, see Section 13.

This checklist may be revised from time to time based on lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

11.3. Flooding

Flash flooding is a result of heavy localized rainfall such as that from slow moving, intense thunderstorms. Flash floods often result from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water, which rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30 minutes to six hours of a heavy rain event. In hilly terrain, flash floods can strike with little or no advance warning. Distant rain may be channeled into gullies and ravines causing flash flooding in minutes. In the event of a flash flood, the following procedures shall apply to any on-site personnel:

- During periods of thunderstorms, always remain alert to heavy rains in your immediate area or upstream from your location. It does not have to be raining at your location for flash flooding to occur.
- Do not drive through flooded areas, even if it looks shallow enough to cross.
- Do not cross flowing streams on foot where water is above your ankles.
- Be especially cautious at night. It is harder to recognize water danger then.
- Do not attempt to outrace a flood on foot. If you see or hear it coming, move to higher ground immediately.
- Be familiar with the land features where you work. It may be in a low area, near a drainage ditch, or near a small stream.
- Continue to monitor weather forecasts and updates for the latest statements, watches, and warnings concerning heavy rain and flash flooding near the site.
- Waiting 15 to 30 minutes, or until high water recedes, is a simple safety measure.

The Fractal ROC will perform the following:

- Send notification email to all necessary parties, including MP2 and any on-site personnel, informing them of potential hazard.
- Continue monitoring and send update emails as necessary.
- Coordinate with MP2 on possible changes in market participation in real-time.

11.4. Tornadoes

Upon the issuance of a tornado warning, any on-site personnel will evacuate the site and report to the pre-designated shelter area, to be determined prior to arrival. In the event on-site personnel are outside and unable to evacuate to the shelter, the following procedures will be followed:

- Lie flat in a nearby ditch or depression, covering the head with the hands. Be aware of the potential for flooding.
- Personnel are safest in a low, flat location and will be instructed to avoid seeking shelter under an overpass or bridge.
- Personnel will be instructed to never try to outrun a tornado in congested areas in a vehicle. It is safest to leave the vehicle for safe shelter.
- Personnel are instructed to beware of flying debris.

The Fractal ROC will perform the following:

- Send notification email to all necessary parties, including MP2 and any on-site personnel, informing them of potential hazard.
- Continue monitoring and send update emails as necessary.
- Coordinate with MP2 on possible changes in market participation in real-time.

11.5. Hurricanes

The Midway BESS site is not located within a hurricane evacuation zone.

12. Water Storage

Midway's BESS site does not rely on water to generate electricity. Therefore, an annex that addresses supply shortages of water is not applicable to Midway.

13. Restoration of Service

The Fractal ROC will perform the following to re-energize the Midway project:

- Work with on-site personnel as required to energize the substation and BESS.
- Ensure all proper starting conditions are achieved prior to closing any breakers and starting BESS equipment.
- Coordinate with MP2 on market re-entry.

14. Pandemic or Epidemic

The Midway BESS site is remotely operated during normal business operations. All personnel can operate effectively remotely under pandemic situations. Fractal will ensure

that any on-site personnel are properly staffed to avoid pandemic-related delays in maintenance activities.

15. Cyber Security

For the Cyber Security plan, refer to the Fractal EMS Cyber Security Overview.

16. Physical Security

The site is enclosed by a 6-ft chain link fence with barbed wire for a total height of 8-ft. The access gates are secured by keyed lock. The site contains six AXIS security cameras. The Fractal ROC will monitor site access remotely and unauthorized access will be reported to local law enforcement.

17. Fire

The Fractal ROC is responsible for remote monitoring of the Midway site. In the event of a fire, the Fractal ROC will notify the local fire department and any on-site personnel. A Fractal technician will be dispatched to the site to manage the fire event in coordination with the fire department and/or emergency response personnel.

All on-site personnel are to be trained and should know how to prevent and respond to a fire emergency. All on-site personnel shall:

- Complete an on-site training program identifying the fire risks at the Midway BESS site.
- Understand the protocol and follow emergency procedures should an event occur.
- Review and report potential fire hazards to the VP of Operations.

No person is required or permitted to place himself or herself in harm's way in order to facilitate extinguishment, evacuation, or rescue. All rescue operations will be performed by trained professionals upon their arrival.

17.1. Conditions Associated with Energy Storage Systems

17.1.1. Unique Challenges

Energy storage systems present a unique challenge for fire fighters. Unlike a typical electrical or gas utility, an energy storage system does not have a single point of disconnect. Whereas there are disconnects that will de-energize select parts of the system, batteries will remain energized.

The following hazards may be encountered when fighting fires in energy storage systems:

- Shock or arcing hazard due to the presence of water during suppression activities.
- Related electrical enclosures may not resist water intrusion from the high pressure stream of a fire hose.
- Batteries damaged in the fire may not resist water intrusion.
- Damaged conductors may not resist water intrusion.
- Shock hazard due to direct contact with energized components.
- No means of complete electrical disconnect.
- Chemical spills.
- Toxic gases.
- Thermal runaway and explosions.

17.1.2. Fire and Water

Due to the hazards described above, care and consideration should be applied when considering fire suppression by means of water inundation within energy storage systems. But, because water as an extinguishing agent is commonplace, the appropriate use of water should be assessed, i.e., whether water reacts with the chemistries present or whether it is not an appropriate extinguisher class. The local fire department should be informed of appropriate fire suppression methods for the energy storage system type as identified by the equipment manufacturer.

If unconventional fire extinguishers are required, local first responders should be alerted and trained on their use, including a familiarization drill. The appropriate and most suitable extinguisher should be recommended based on the specific needs of the site in accordance with guidance from the manufacturer. This may include water in some cases, and in all scenarios its use should not be discouraged.

All fire extinguishing equipment, whether automatic or manual, shall be regularly inspected for functionality as per manufacturers' guidance.

17.2. Response to a Fire Incident

In the event of an incipient stage (beginning, small) fire, on-site personnel should notify adjacent individuals of this situation and exit the area. Only on-site personnel trained in the use of fire extinguishers or other manual fire suppression systems should attempt to use an extinguisher or system. On-site personnel are not expected or authorized to respond to fires beyond the incipient stage (i.e., fires that are beyond the beginning stage and which cannot be extinguished using a hand-held, portable fire extinguisher). The fire department should be immediately notified by dialing 911 when any type of unintended fire has taken place. Fractal shall also be immediately notified of any emergency.

17.2.1. Fire External to Battery Container or Enclosure

If a fire external to the battery container or enclosure ignites, on-site personnel should:

- Call 911.
- Make sure the immediate area of the fire is clear of personnel.
- Account for all employees, contractors, and visitors who were working in the immediate area of the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made throughout the site in an attempt to locate the person(s) missing. If the person(s) is equipped with a radio, then an emergency transmission shall be communicated in attempt to locate the person(s).
- Contact the VP of Operations and VP of Midway immediately.
- Remove any obstructions (vehicles, material, etc.) that might impede a response to the scene.
- Station available personnel at road intersections to stop traffic flow into the fire scene.
- Evacuate the energy storage system area immediately if the fire warning alarm sounds or fire warning lights illuminate.
- Proceed to the designated muster point for head count.
- If on-site, the site representative of Fractal will do a head count and relay any information/instructions.
- If you encounter heavy smoke, move away from the area, stay low, and breathe through a handkerchief or other fabric.
- Assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk.
- Attempt to extinguish the fire ONLY if you have had the appropriate training and the proper firefighting agent for the type of fire, as provided in the manufacturers' Safety Data Sheet.
- Do not leave the designated muster point until advised to do so unless it is unsafe to stay.
- The VP of Operations will issue an 'all clear' only when the fire department informs them that it is safe to do so.
- The BESS is not to be accessed until the VP of Operations or the VP of Midway gives authorization.

17.2.2. Fire Internal to Battery Container

If a fire internal to the battery container ignites, on-site personnel should:

- Call 911.
- Make sure the immediate area of the fire is clear of personnel.

- Account for all employees, contractors, and visitors who were working in the area of the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made throughout the site in attempt to locate the person(s) missing. If the person(s) is equipped with a radio, then an emergency transmission shall be communicated in attempt to locate the person(s).
- Contact the VP of Operations immediately.
- Evacuate the area immediately if the fire warning alarm sounds or fire warning lights illuminate.
- Remove any obstructions (vehicles, material, etc.) that might impede a response to the scene.
- Proceed to the designated muster point for head count.
- If on-site, the site representative of Fractal will do a head count and relay any information/instructions.
- If you encounter heavy smoke, move away from the area, stay low, and breathe through a handkerchief or other fabric.
- If there is a second means of egress that is clear of smoke, that egress path will be used and a radio transmission or other type of communication shall be made stating that the clear egress point for other personnel to use for escape is the second means of egress.
- Assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk.
- The fire suppression system is designed to work in a contained environment. DO NOT open the doors until it has been determined that the agent has been fully released and a pre-determined amount of time has passed to ensure no hazards are present, and with approval of emergency personnel and the VP of Operations.
- DO NOT put anyone in harm's way to save the battery equipment in the container.
- Once the Fire Department arrives, provide them with the following -
    - All applicable manufacturers' Safety Data Sheets.
    - Assistance isolating equipment electrically.
    - This EOP.
    - A liaison to remain with the fire department Incident Commander as needed.
- Do not leave the designated muster point until advised to do so unless unsafe to stay.
- The VP of Operations will issue an 'all clear' only when the fire department informs them that it is safe to do so and the site (or portions of it) can be reoccupied or normal working conditions can be resumed again.
- The energy storage system is not to be accessed until the VP of Operations or VP of Midway and the emergency responders give authorization.

In the event of a fire incident, the designated operations personnel responsible for the safe shutdown of the plant will open switchgear to ensure the grid side of the plant is de-energized and isolate the batteries as best able to (i.e., verify the AC and DC breakers

are open in the inverter). The Fire Department needs to understand that some of the equipment (batteries) will remain energized no matter what actions are taken, and the recommended option is containment. Batteries remain energized even if all the contactors, breakers, and switches have been opened.

17.2.3. After a Fire

Hazards after a fire should be identified at the time of installation such that recommendations for personal protective equipment ("PPE") are available for clean-up crews and hazardous materials ("HAZMAT") teams. This may include respirators to protect personnel from toxic gas that continues to be generated from hot cells. Firewater retention and cleanup measures may be required by local regulations. Once first responders have turned the site back to Midway, the VP of Operations shall direct on-site personnel on procedures for securing the site for safety and pending any investigation.

In addition to the gas generation risk, cells that remain hot also pose a delayed ignition risk, whereby heat in the cell may transfer to undamaged adjacent cells or remaining active material and reignite the fire. As such, fire-damaged equipment must remain monitored for a minimum of 30 days following the fire incident.

Care should be taken to ensure that damaged batteries containing energy have been safely de-energized in accordance with disposal procedures, if possible, before handling and disposal. If unable to completely de-energize batteries involved in a fire, care should be taken with handling or dismantling battery systems involved in fires as they may still contain hazardous energy levels.

18. Fuels

Because the BESS does not consume fuels, there is no fuel switching equipment installed. Therefore, the requirement to verify the adequacy and operability of fuel switching equipment is not applicable to Midway.

19. Equipment Weatherization

The Midway BESS facilities are weatherized consistent with manufacturer requirements and recommendations.

Best efforts should be used to implement weather emergency preparation measures intended to ensure the sustained operation of equipment critical to the reliable operation during the winter peak and summer peak load seasons.

Appendix A: Emergency Response Contact Information Sheet

Remote Operations Desk:

[redacted]

Outside Responder Numbers:

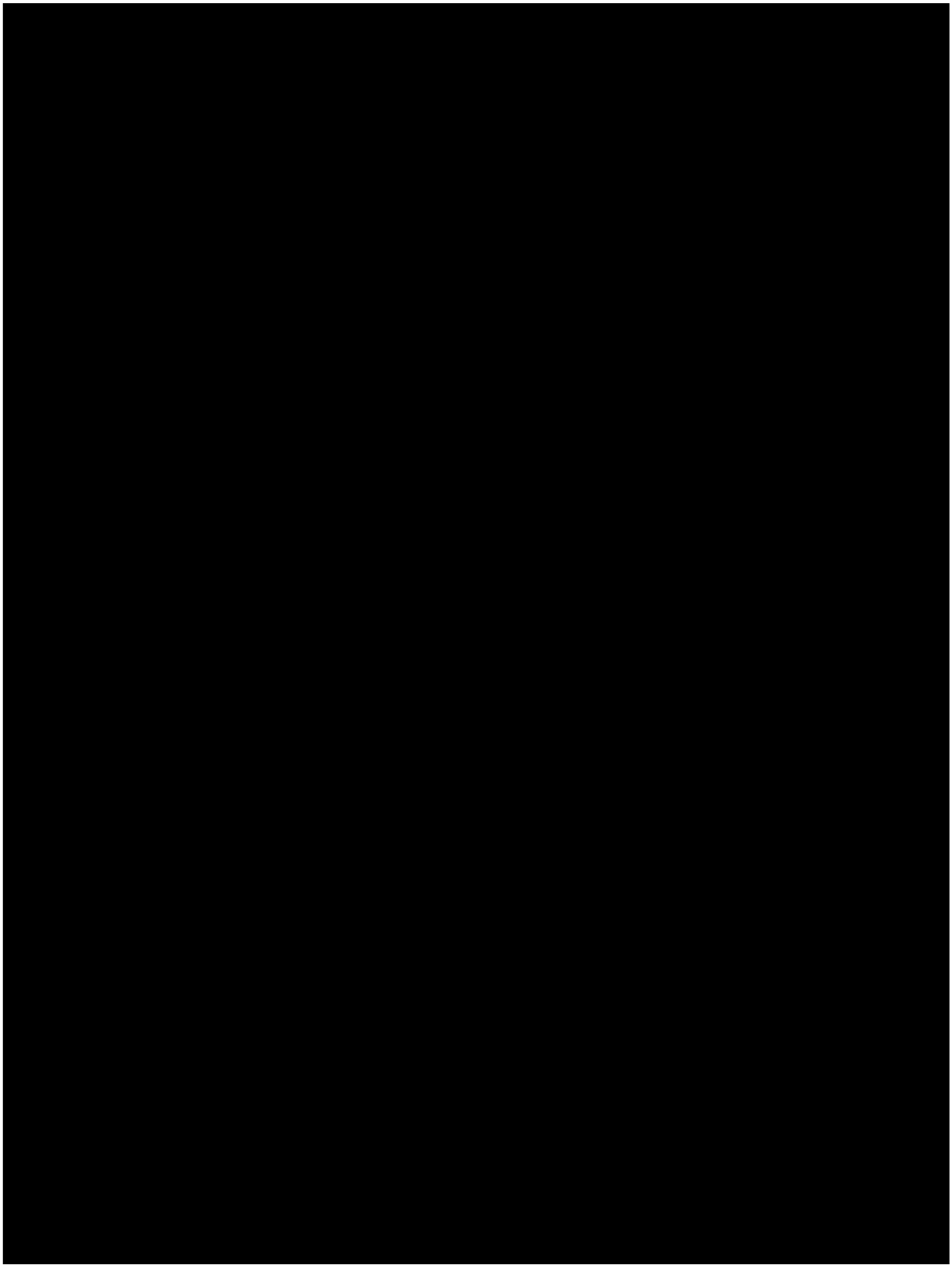
Ector County Sheriff (non-emergency)	(432) 335-3050
General Emergency	911
Fire/Ambulance	911
Ector County, Non-Emergencies - Office	(432) 335-3050
Ector County – Sam Brijalba, Risk Management/Safety Coordinator	(432) 498-4097
MCH Urgent Care JBS Parkway 3001 John Ben Shepperd Pwky Odessa, TX 79762	(432) 640-6700

Regulatory Agency Numbers:

TCEQ Emergency Release Hotline	(800) 832-8224
National Response Center (only if spill leaves the property)	(800) 424-8802
TCEQ Region 7	(432) 570-1359
OSHA – Lubbock Area Office	(806) 472-7681
Chemtrec (for information on hazardous materials)	(800) 424-9300
OPUC Main Number	(512) 936-7500
PUCT Main Number	(512) 936-7000
PUCT Emergency Contact #1 – [redacted] Office Cell	[redacted]
PUCT Emergency Contact #2 – [redacted] Office Cell	[redacted]
PUCT Emergency Contact #3 – [redacted] Office Cell	[redacted]

ERCOT	Via QSE

Appendix B: Site Information



Appendix C: Record of Distribution

Name	Title, Company	Date of Access	Date of Training

Attachment B

AFFIDAVIT

THE STATE OF TEXAS §
§
COUNTY OF REEVES §

BEFORE ME, the undersigned authority, on this day personally appeared William O. Perkins, III who swore an oath that the following facts are true:

1. My name is William O. Perkins, III. I am the President of Midway BESS Station, LLC ("Midway") and the highest-ranking officer with binding authority over Midway. I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of Midway. I have personal knowledge of the matters described herein.

2. Midway has developed an emergency operations plan (the "EOP") in accordance with 16 Texas Administrative Code ("TAC") § 25.53. The EOP was approved on August 1, 2023.

3. The Midway facility is a battery energy storage system.

4. Prior to commercial operations, all relevant operating personnel will have access to and will receive training on the applicable contents and execution of the EOP, and such personnel will be instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

5. The EOP has been reviewed and approved by the appropriate executives.

6. Midway plans to conduct a drill in accordance with 16 TAC § 25.53(f) by December 31, 2023.

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

8. The EOP constitutes a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

9. Prior to commercial operations, the VP of Midway, who is designated to interact with local, state, and federal emergency management officials during emergency events, will complete the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System ("NIMS") training.

FURTHER AFFIANT SAYETH NOT.

William O. Perkins, III
President
Midway BESS Station, LLC

Sworn to and subscribed before me this 1 day of August 2023.

Notary Public, State of Texas
My Commission Expires: 12-23-2024

Rebecca Grace Oxley
My Commission Expires
12/23/2024
ID No. 132839988

Attachment C

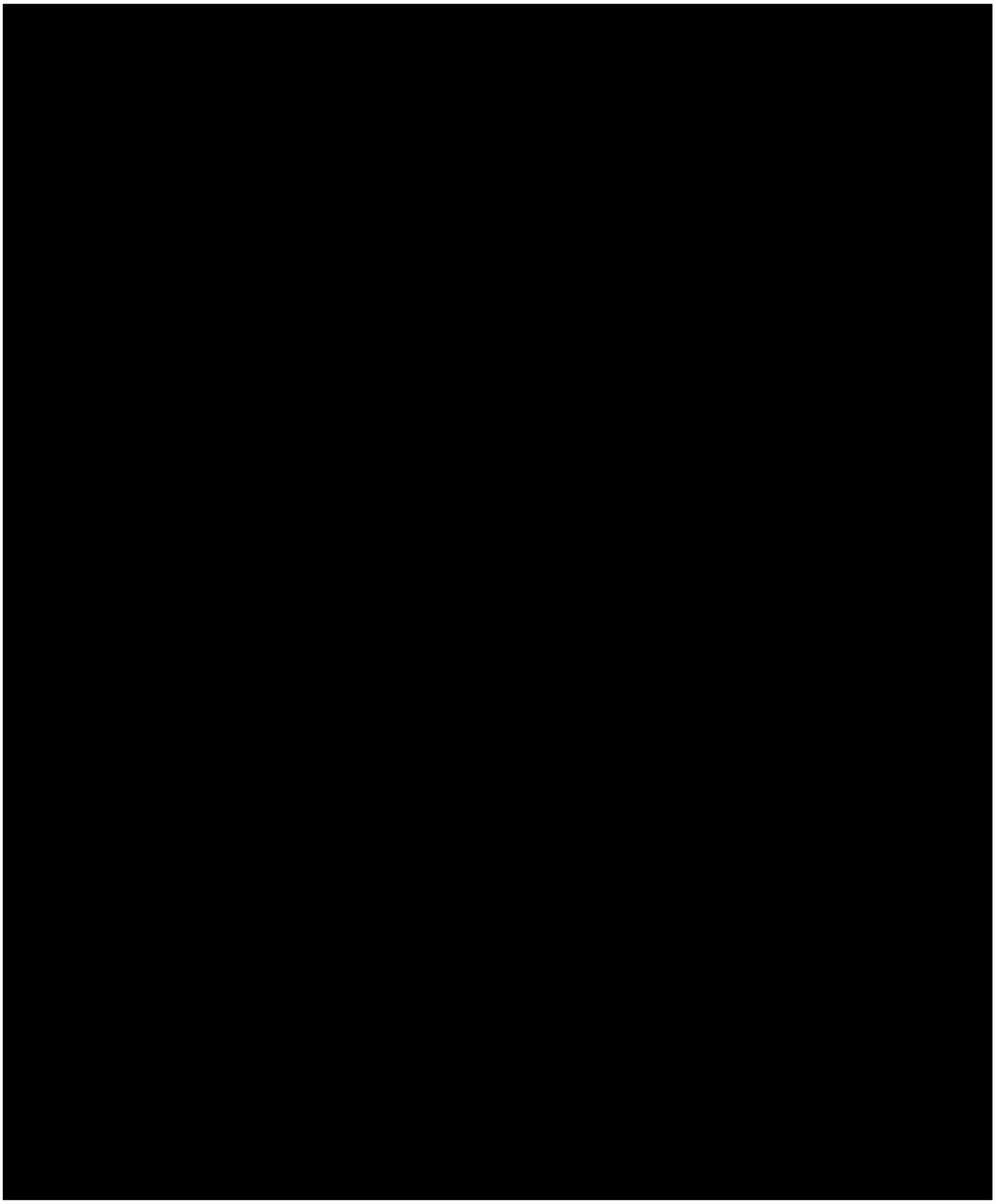
FRACTAL EMS

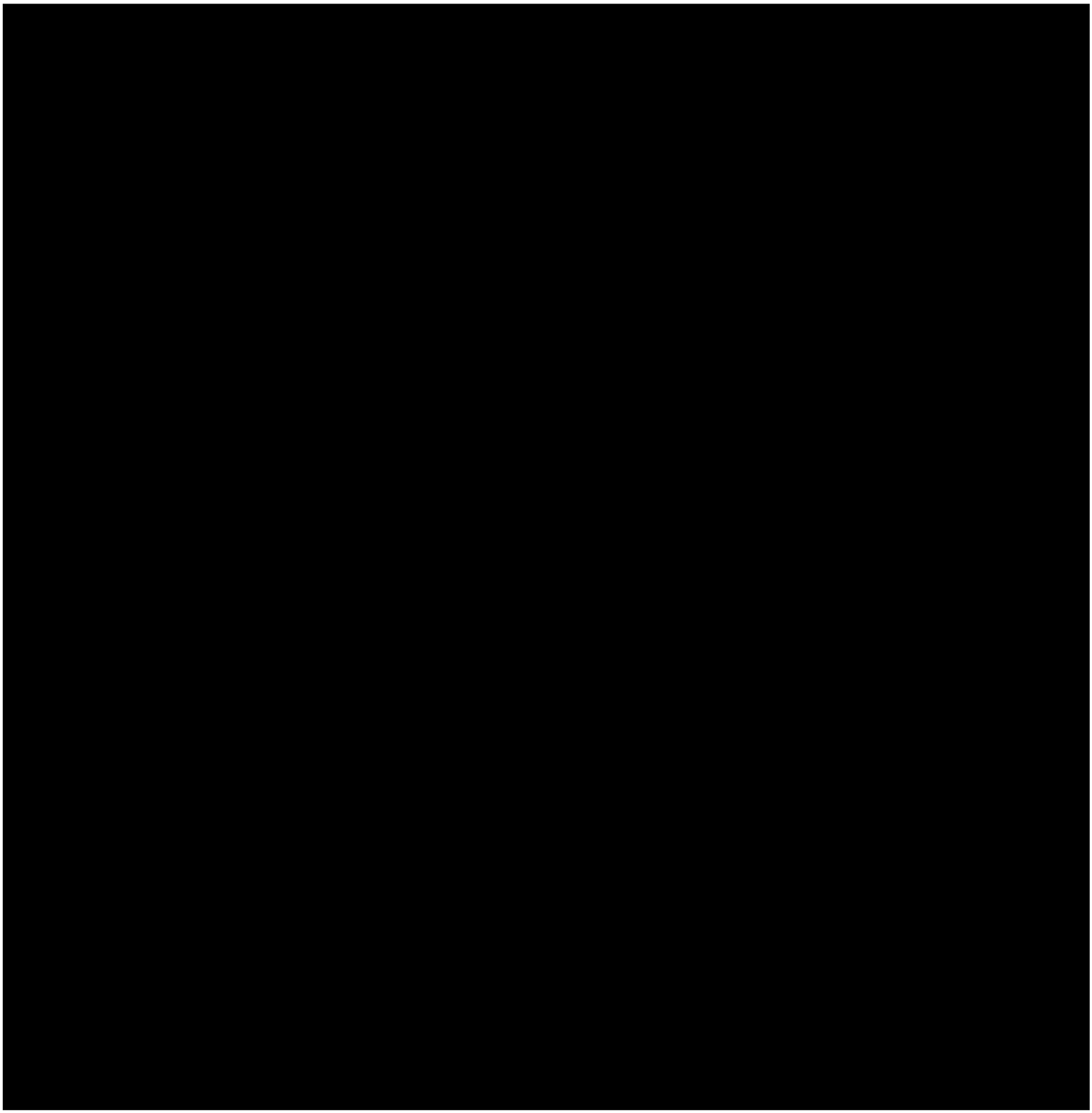
Cyber Security Overview

Issue 3
Issue Date 02/02/2022

Fractal EMS Inc.
8656 W Hwy 71 Bldg F Ste 100
Austin, Texas 78735

512.566.7516
info@fractalems.com
www.fractalemscom





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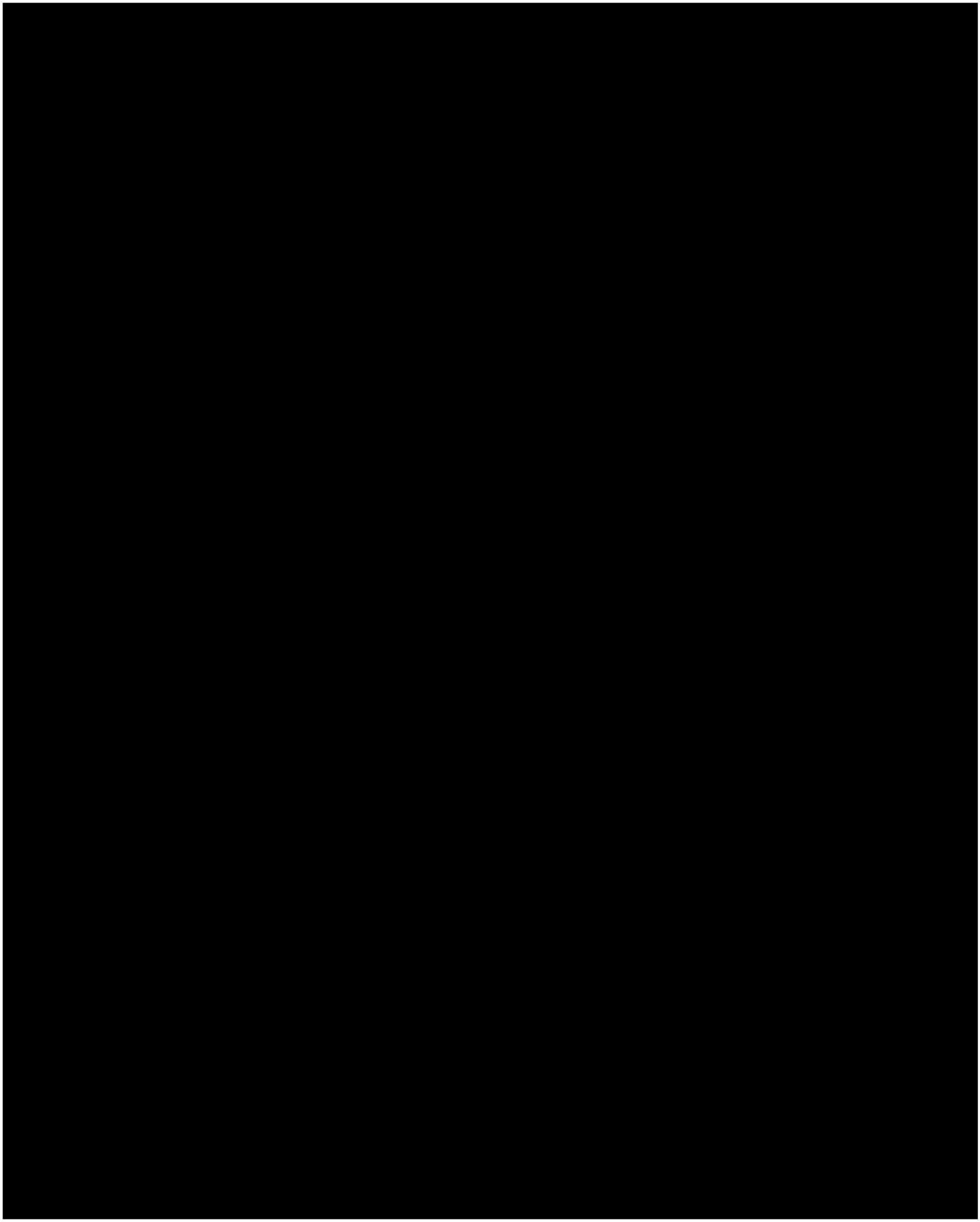

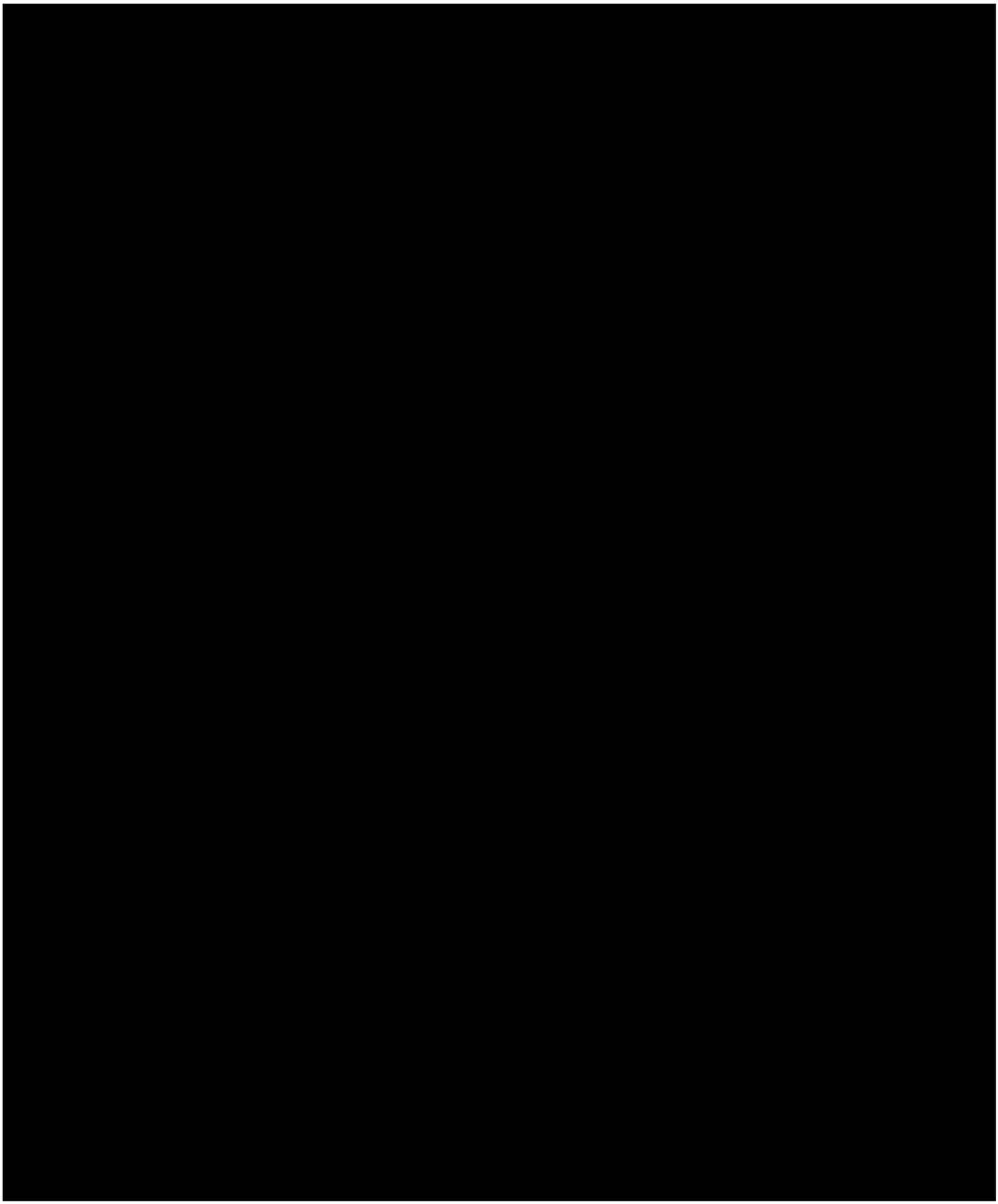

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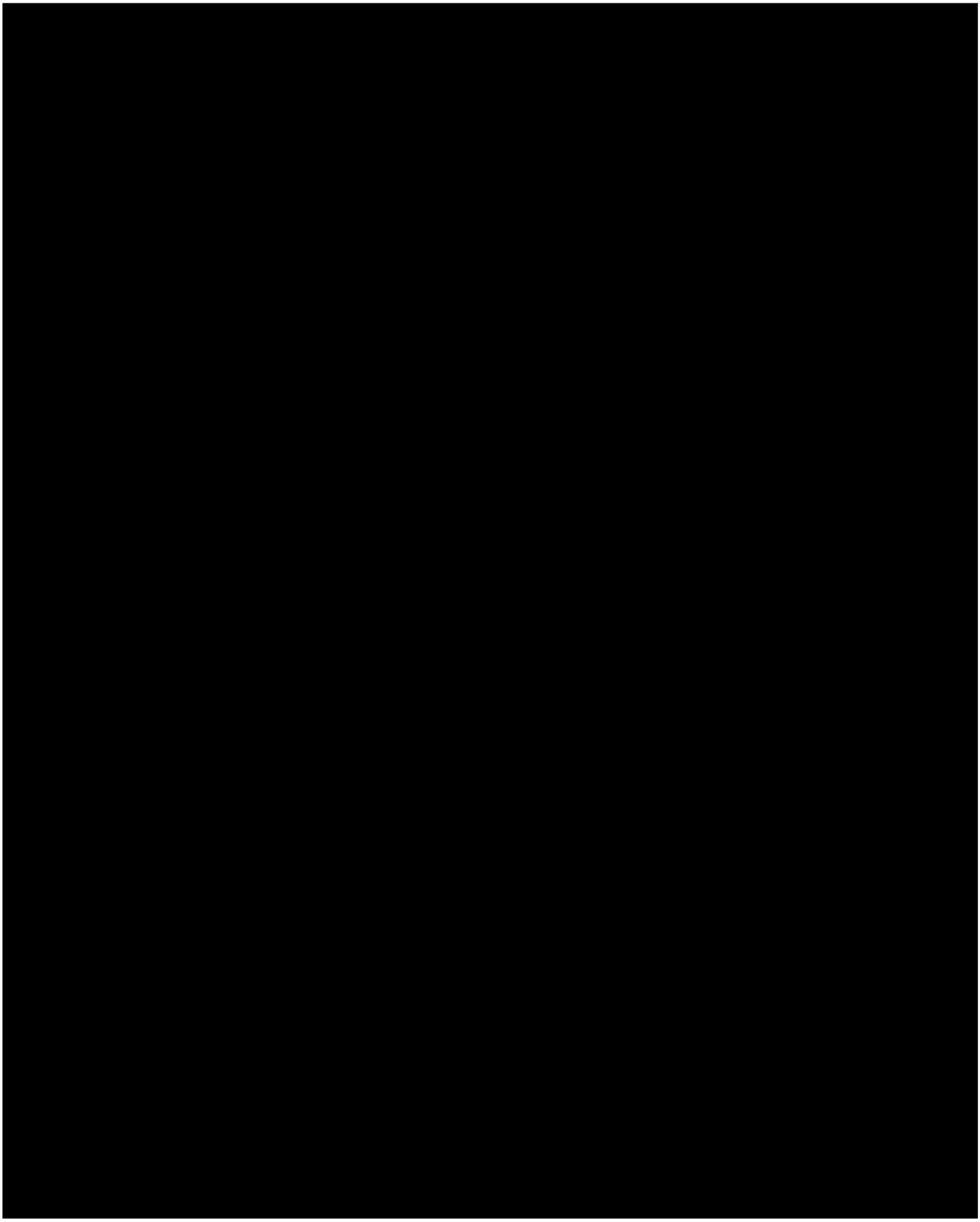

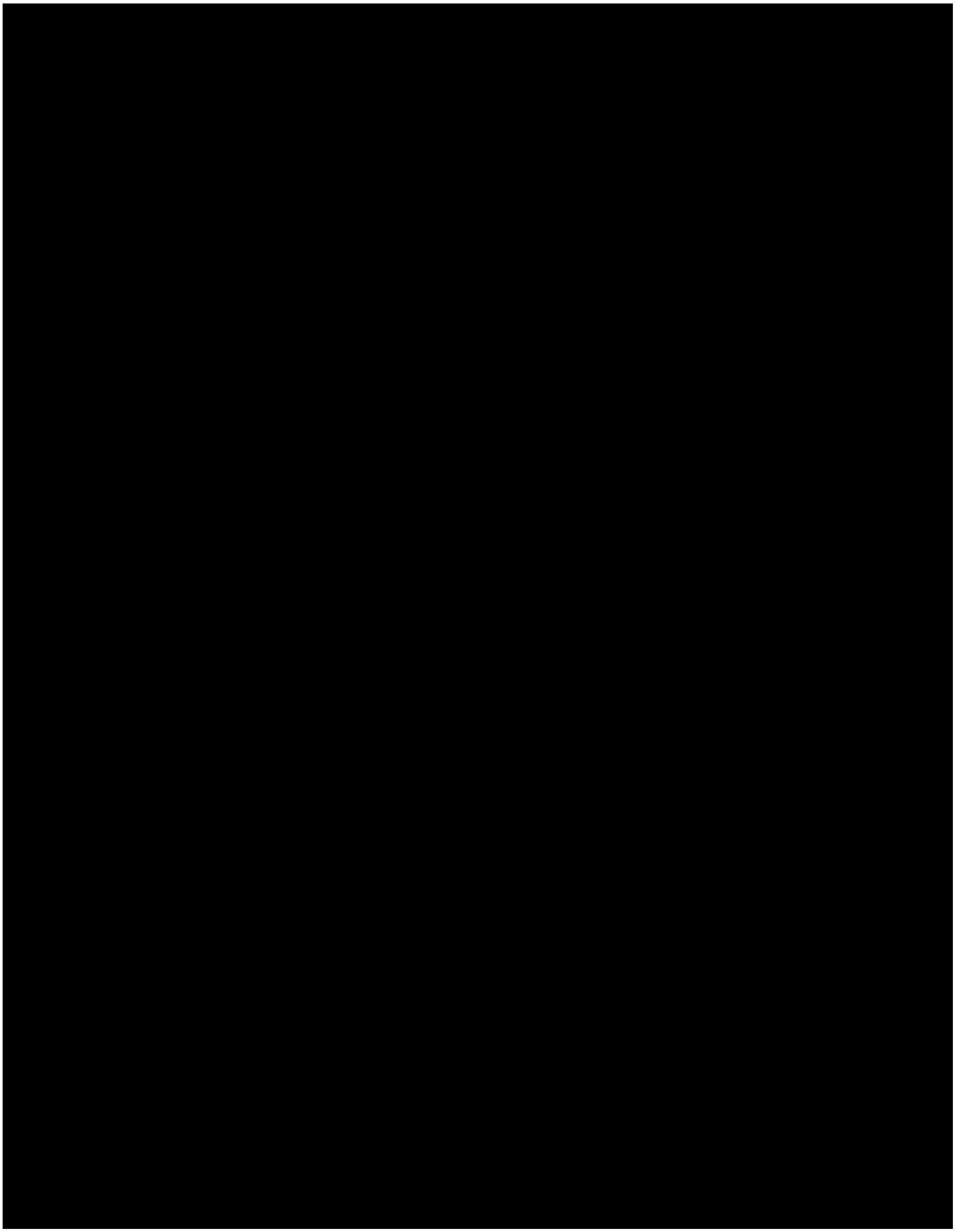

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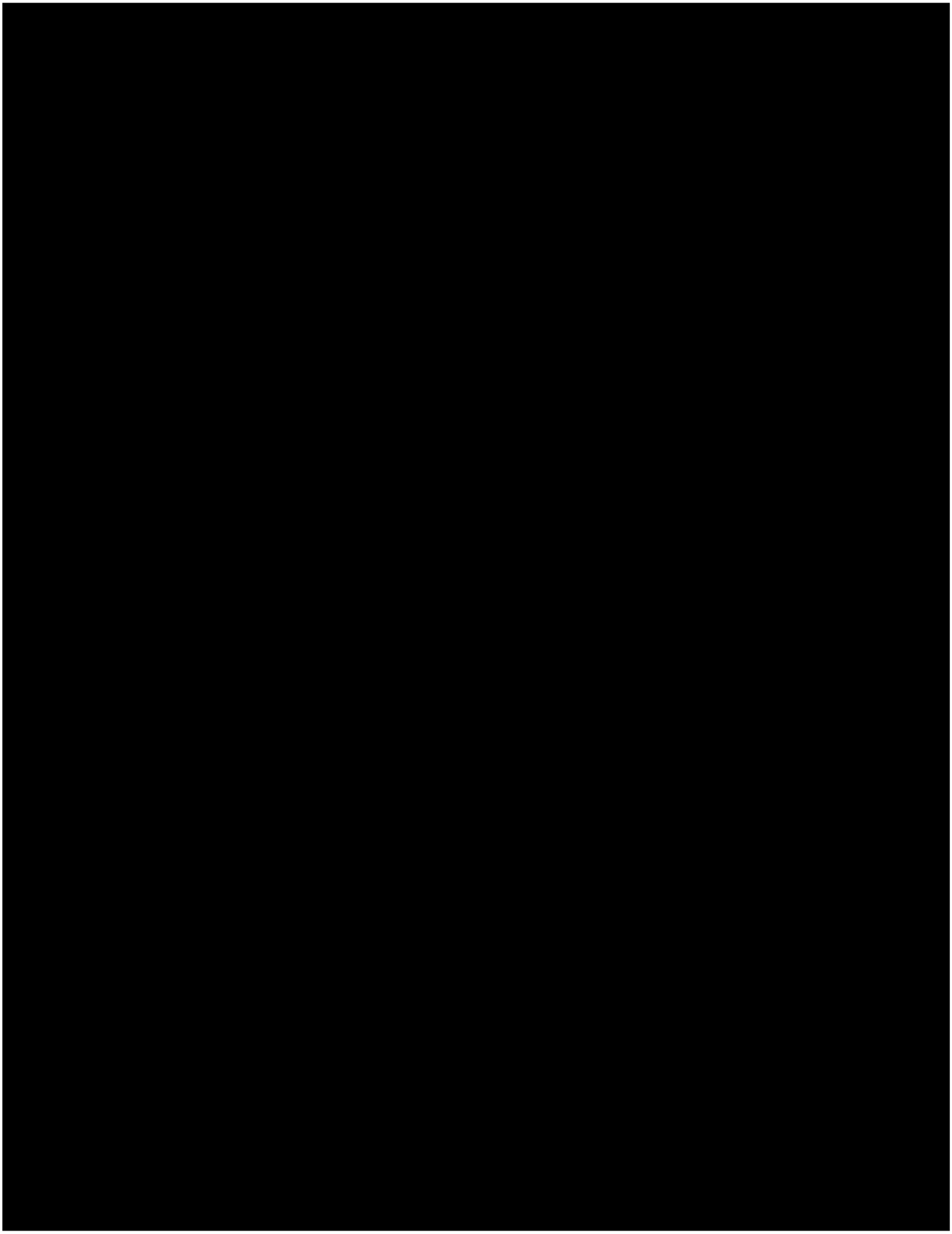

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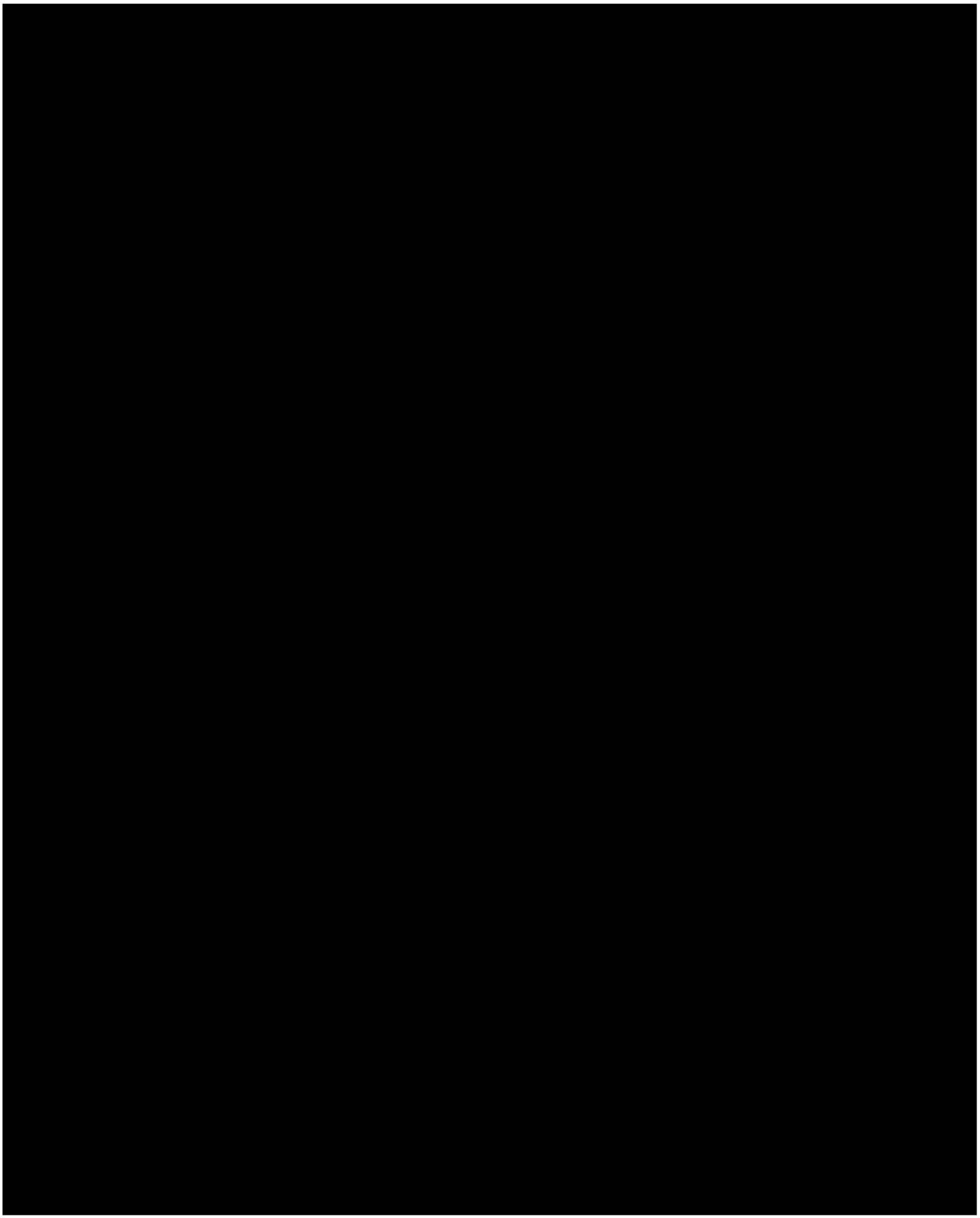

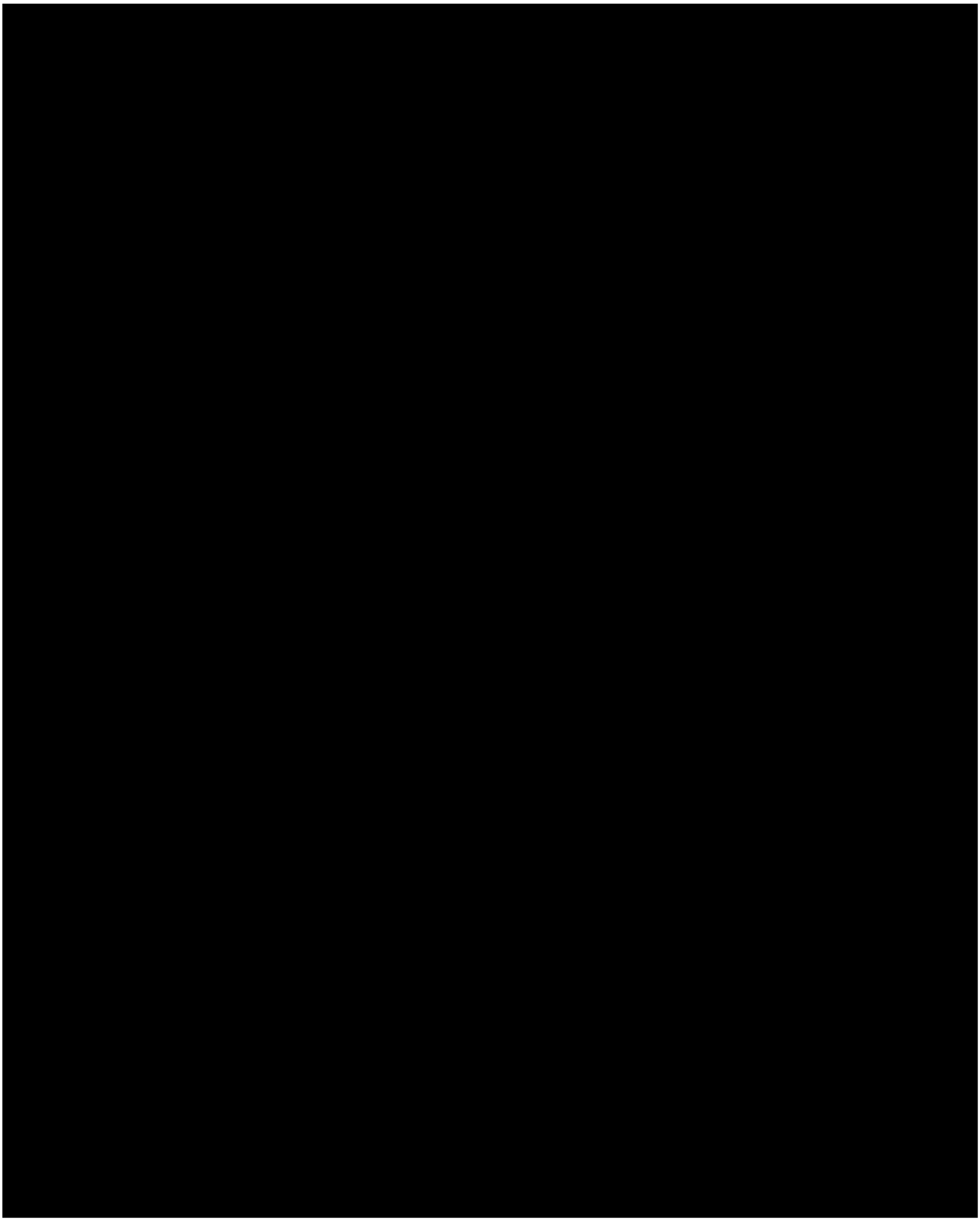

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