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1.0 POWER GENERATION COMPANY INFORMATION

PGC Name	Generating Facility Name
Ellis Solar, LLC	Ellis

2.0 EXECUTIVE SUMMARY - EOP CONTENTS

2.1 Summary of Approval and Implementation

This section documents the applicability of the EOP and its associated annexes, identifies the areas on non-applicability due the facility not having the capabilities, technology or location within a zone which would require an annex, general information about the facilities included within the EOP as well as the Roles and Responsibilities of the personnel responsible for developing, implementing and updating the EOP. Due to non-applicability, Ellis does not maintain Annexes for the following;

Section	Statement of Non-Applicability
(e)(2)(A)(ii) Adequacy and operability of fuel switching equipment	Ellis as a solar PV facility does not have the capability to utilize alternate fuels or to perform fuel switching.
(e)(2)(B) Water Shortage Annex	Ellis does not utilize water in the generation of electricity.
(e)(2)(E) Hurricane Annex	Ellis is not located in a hurricane evacuation zone (as defined by the Texas Division of Emergency management (TDEM) ¹

2.1 Summary of Emergency Operations Plan

The *Emergency Operations Plan* is the over-arching document that sets the policies for emergency conditions that could impact the operation of the facility as well as the safety of personnel at the facility. It includes applicability and non-applicability statements, information about the facility, a process for activating the EOP as well as establishes the roles and responsibilities of site personnel and Ellis's Emergency Management Personnel. In addition to the various Plans and Annexes, The EOP also contains the general emergency site procedures (e.g. evacuation, personnel injuries and treatment, fire and hazardous material response. Solid planning requires practice and training, the EOP lays out requirements for training to relevant personnel and annual drill requirements.

2.2 Summary of Communications Plan

This section describes the training necessary for emergency management personnel who will interface with Media, the PUCT, the OPUC, local and State government officials and Emergency Operations Centers, the ERCOT Reliability Coordinator and fuel suppliers. Ellis, being a solar PV facility does not utilize fuel and therefore does not communicate with fuel suppliers.

2.3 Summary of Plan for Pre-Identified Supplies for Emergency Use

Each of the annexes applicable to the PGC, including the Cold Weather Annex and Hot Weather Annex contain a list of supplies that are unique to the content of the annex and are completed pre-season and/or pre-event.

2.4 Summary of Plan that Addresses Staffing during Emergency Response

The EOP includes a plan for consideration of staffing during an event and, as appropriate, contains items to review and confirm staffing availability as well as request additional staffing before (if possible) and during an event.

2.5 Summary of Plan for Identification of Weather – Related Hazards

The EOP includes a plan built to identify weather-related hazards specific to Ellis. The weather related annexes are built on site-specific data, including information provided by the State, County, and regional emergency managers, as well as a consideration of local conditions as documented and published online.

2.6 Summary of Restoration of Service Annex

Includes a summary of the process for restoration of generation due to a failure to start or tripping off-line of the Ellis facility as well as availability of backup power from the utility feed and anticipated response time from an outage event.

2.7 Summary of General Emergency Procedure

Includes role and responsibilities for developing emergency situations, general emergency protocols for response and management of in-progress site activities during an emergency.

2.8 Summary of Evacuation Procedures Annex

Provides guidance for notification of site personnel of a decision to evacuate, designated muster areas, roll calls to ensure all personnel are accounted for and designated egress routes to post-evacuation muster area.

2.9 Summary of Personnel Injuries or Serious Health Conditions Annex

Provides guidance for basic First Response Actions when personnel are injured or experience a serious health condition at the jobsite and provides a list of first aid and emergency medical supplies and their locations.

2.10 Summary of Fire Response Plan Annex

Provides guidance for initial response and communications when a fire is discovered, insipient stage fire-fighting efforts, escalation to local fire department and an inventory and location of on-site fire-fighting equipment.

2.11 Summary of Chemical or Oil Spills and Releases Annex

Provides guidance for the handling of any chemical, oil or hazardous material release at the facility including an inventory and location of mitigation and containment equipment at the facility.

2.12 Summary of Pandemic and Epidemic Preparedness Annex

The *Pandemic and Epidemic Annex* serves as the annex for maintaining essential functions and services during a pandemic. This document addresses the specialized continuity planning required by addressing considerations, challenges, and elements specific to the dynamic nature of a pandemic or epidemic. The Annex defines a crisis team that is responsible for evaluation and assessment, as well as the development of response actions and communications.

2.13 Summary of Hot Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme hot weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.14 Summary of Cold Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme cold weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.15 Summary of Cyber and Physical Security Incident Annex

This annex is specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents. The annex addresses how to identify potential physical or cyber indicators of an incident, and how to escalate, investigate, and report a potential or actual incident.

Summary of

3.0 EXECUTIVE SUMMARY – DOCUMENT AND REQUIREMENTS MAPPING

Requirement	Addressed in document	Where it is addressed in the document
16 TAC Sec. 25.53 (d) Information to be included in the emergency operations plan		
(1)(A)	Emergency Operations Plan and Section 25.53 Executive Summary	Section 1.0 Approval and Implementation (EOP p.5) <ul style="list-style-type: none"> • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(1)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> • B. Roles and Responsibilities (EOP p.6)
(1)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> • C. Revision Control Summary (EOP p.8)
(1)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> • C. Revision Control Summary (EOP p.8)
(1)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> • D. Approvals (EOP p.8)
(2)(B)	Emergency Operations Plan	Section 3.0 Communication Plan (EOP p.9)
(3)	Emergency Operations Plan	<ul style="list-style-type: none"> • Section 4.0 Plan for Pre-Identified Supplies for Emergency Use (EOP p.10)
	Cold Weather Annex	5.0 Cold Weather Preparation and Response Processes (Annex p.6) <ul style="list-style-type: none"> • 5.2 Cold Weather Equipment Inventory List • Attachment 2: Cold Weather Equipment Inventory (Annex p.14)
	Hot Weather Annex	5.0 Hot Weather Preparation and Response Processes (Annex p.6) <ul style="list-style-type: none"> • 5.2 Hot Weather Equipment Inventory List • Attachment 2: Hot Weather Equipment Inventory (p.14)
	Fire Response Plan Annex	<ul style="list-style-type: none"> • Fire Fighting Equipment Inventory and Location (EOP p.32)
	Chemical or Oil Spills and Releases Annex	<ul style="list-style-type: none"> • Chemical and Oil Spill Mitigation and Containment Equipment Guidance (EOP p.35)
	Personnel Injuries and Serious Health Conditions Annex	<ul style="list-style-type: none"> • First Aid and Emergency Medical Supplies Inventory and Location (EOP p.30)
(4)	Emergency Operations Plan	<ul style="list-style-type: none"> • Section 5.0 Plan to Address Staffing During Emergency Response (EOP p.10)
(5)	Emergency Operations Plan	<ul style="list-style-type: none"> • Section 6.0 Identification of Weather-Related Hazards (EOP p.11) • Section 2.0 Process for Activating the EOP (EOP p.8)
16 TAC Sec. 25.53 (e) Annexes to be included in the emergency operations plan		
(2)(A)(i)	Cold Weather Annex	Entire document
	Hot Weather Annex	Entire document

Requirement	Addressed in document	Where it is addressed in the document
(2)(A)(ii)	Cold Weather Annex	<ul style="list-style-type: none"> Not applicable as Ellis does not have fuel switching equipment installed
	Hot Weather Annex	<ul style="list-style-type: none"> Not applicable as Ellis does not have fuel switching equipment installed
(2)(A)(iii)	Cold Weather Annex	<ul style="list-style-type: none"> 5.4 Post-Event and Annual Review Attachment 3: Pre-Winter Checklist Attachment 6: Extreme Cold or Severe Weather Checklist
	Hot Weather Annex	<ul style="list-style-type: none"> 5.4 Post-Event and Annual Review Attachment 3: Pre-Summer Checklist Attachment 6: Extreme Hot Weather Checklist
(2)(B)	Water Shortage Annex	Not applicable as Ellis does not utilize water in the generation of electricity
(2)(C)	Emergency Operations Plan	Attachment 2 Restoration of Service Annex <ul style="list-style-type: none"> Failure to Start or Tipping Off-line (EOP p21) Response Time and Backup Power (EOP p21) Generation Facility Startup Procedure (EOP p20)
(2)(D)	Pandemic and Epidemic Annex	Attachment 8. Pandemic Preparedness Annex Entire document
(2)(E)	Hurricane Annex	Not applicable as Ellis is not located in a hurricane evacuation zone (as defined by the Texas Division of Emergency management (TDEM))
(2)(F)	Cyber and Physical Security Incident Annex	Attachment 9. Entire document
(2)(G)	Cyber and Physical Security Incident Annex	Attachment 9. Entire document
(2)(H)	Additional Annexes	Not applicable as Ellis does not have any additional annexes

4.0 RECORD OF DISTRIBUTION AND TRAINING

This table presents information, as required, of the persons in the entity's organization receiving access to and training on the EOP, as appropriate.

Organization Name	Title	Individual	Date(s) of Distribution and Training EOP
174 Power Global	Director of O&M	Mark Behm	2023.08.10
174 Power Global	Operations Manager	Gerry Rodriguez	2023.08.10

Organization Name	Title	Individual	Date(s) of Distribution and Training EOP
Novasource	Site Supervisor	David Coldiron	2023.08.10
Novasource	Compliance Analyst	Christopher Chavez	2023.08.10
Novasource	Site Technician	Matthew Burton	2023.08.10
Novasource	Site Technician	Cameron Griffin	2023.08.10
GridSME	Compliance Analyst	Kaylie Hague	2023.08.10

5.0 AFFIDAVIT

Ellis attaches an affidavit from [OFFICER NAME, TITLE], its highest-ranking representative, official, or officer with binding authority over Ellis in accordance with 16 Tex. Admin. Code Sec. 25.53(c)(4)(C).


SEE NEXT PAGE

State of CALIFORNIA)
)
County of ORANGE)

AFFIDAVIT

Before me, the undersigned authority, on this day personally appeared, who, having been placed under oath by me, did depose as follows:

1. My name is David Kim. I am over the age of 18 and fully competent to make this affidavit. I have personal knowledge of the facts set forth in this affidavit. I declare under penalty of perjury that all the facts contained within this affidavit are true and correct.
2. I am employed by 174 Power Global ("174PG") as Chief Financial Officer , and I am a member of 174PG's senior leadership team with binding authority over the power generation companies owned by 174PG, including Ellis Solar, LLC.
3. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are 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.
4. The EOP has been reviewed and approved by the appropriate executives.
5. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
6. Drills will be conducted to the extent required by 16 TAC 25.53(f) and an updated affidavit will be filed with the Public Utility Commission of Texas accordingly.
7. Ellis Solar, LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
8. Ellis Solar, LLC's Emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.



David Kim

Sworn and subscribed before me, Kimberly Rae Johnson, a notary public, in and for the State of California this 14th day of August, 2023.

