

## **Filing Receipt**

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Control Number - 53385

Item Number - 1580

## Project 53385

# **BRP IntermediateCo I LLC Emergency Operations Plan Filing**

# **EXECUTIVE SUMMARY**

#### **BRP INTERMEDIATECO I LLC**

#### BRP IntermediateCo I LLC Emergency Operations Plan Executive Summary

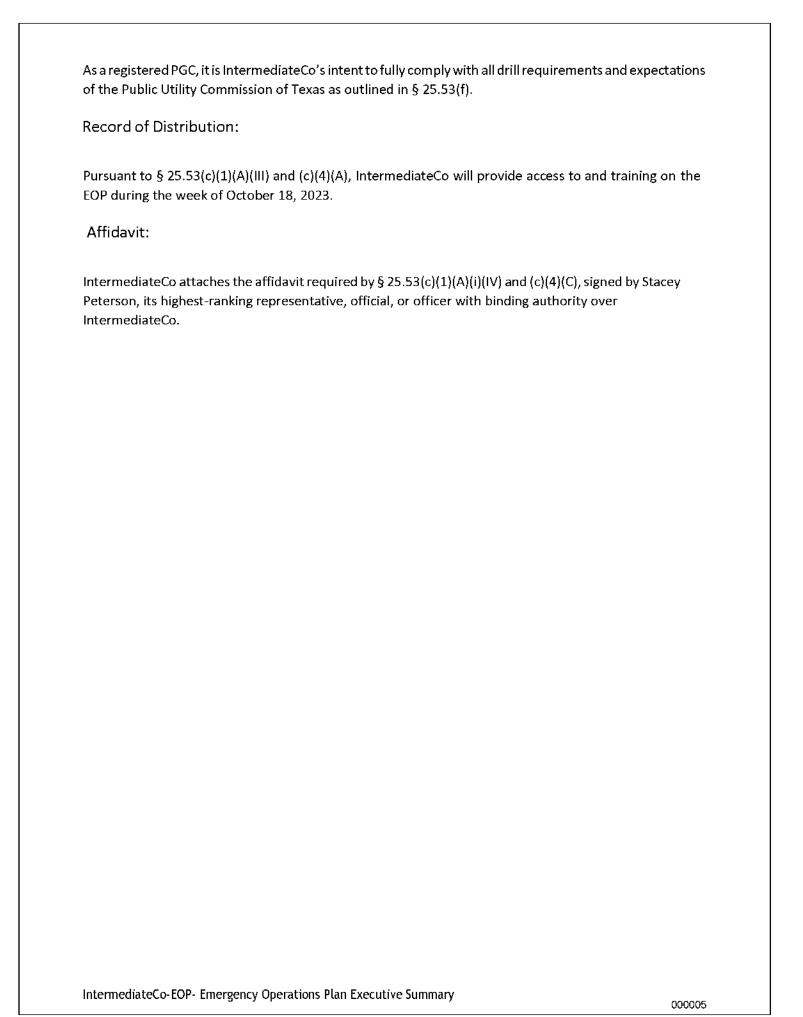
#### Executive Summary:

As a registered power generation company ("PGC"), BRP IntermediateCo I LLC ("IntermediateCo") is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. IntermediateCo has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT concurrently with submission of IntermediateCo's PGC application for its new facilities that have not achieved commercial operations, or (b) beginning in 2023, annual updates to the EOP must be filed by March 15<sup>th</sup> in the circumstances outlined by §25.53(c)(3). At all times, the most recently approved copy of the IntermediateCo Emergency Operations Plan must be available at the IntermediateCo's main office for PUCT inspection.

For IntermediateCo, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

- (d)(1)(A-D) Approval and Implementation (p. 1) Section that:
  - Introduces the EOP and outlines its applicability;
  - Lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;
  - Provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to § 25.53(c)(1); and
  - States the date of the EOP was most recently approved by the PGC.
- (d)(2)(B) Communication Plan (p. 2) describing the procedures during an emergency for communicating with the media; the PUCT; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances of the PGC; and the applicable reliability coordinator.
- (d)(3) Plan for Maintenance of Pre-identified Supplies (p. 5) for Emergency Response.
- (d)(4) Plan that Addresses Staffing (p. 5) during Emergency Response.
- (d)(5) Plan that Addresses how the PGC identifies weather-related hazards (p. 6), including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the PGC follows to activate the EOP.

- (c)(4)(B) List of primary and, if possible, backup emergency contacts (p. 1)
- (c)(1)(A)(i)(IV) and (c)(4)(C) Affidavit from the PGC's highest-ranking representative, official, or officer with binding authority over the PGC stating the following:
  - 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;
  - The EOP has been reviewed and approved by the appropriate executives;
  - Drills have been conducted to the extent required by subsection (f) of the rule;
  - The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
  - The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
  - The entity'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.
- Annexes to be included in the EOP A PGC must include:
  - (e)(2)(A) Weather emergency annex (p. 7) that includes:
    - Operational plans for responding to a cold and hot weather emergency, distinct from the weather preparations required under §25.55;
    - Verification of the adequacy and operability of fuel switching equipment, if installed; and
    - A checklist for generation resource personnel to use during a cold or hot
      weather emergency response that includes lessons learned from past
      weather emergencies to ensure necessary supplies and personnel are
      available through the weather emergency.
  - (e)(2)(B) Water shortage annex (p. 8) that addresses supply shortages of water used in the generation of electricity;
  - (e)(2)(C) Restoration of service annex (p. 8) that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;
  - (e)(2)(D) Pandemic and epidemic annex (p. 8);
  - (e)(2)(E) Hurricane annex (p. 8) that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
  - (e)(2)(F) Cyber security annex (p. 8);
  - (e)(2)(G) Physical security incident (p. 8) annex; and
  - (e)(2)(H) Any additional annexes as needed or appropriate to the entity's particular circumstances
- Drills



## **AFFIDAVIT**

#### **AFFIDAVIT**

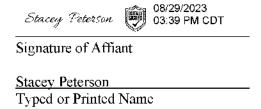
STATE OF TEXAS	8
	8
COUNTY OF TRAVIS	8

My name is Stacey Peterson. I am the President, and authorized signatory for Broad Reach IntermediateCo I LLC ("BRI"). As President for BRI, I affirm that am the highest-ranking representative, official, or officer with binding authority over BRI. I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of BRI.

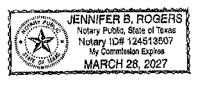
I swear or affirm that in my capacity as President of BRI, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed in Project No. 53385, and of the facts included in this Affidavit.

Pursuant to 16 Tex. Admin. Code ("TAC") § 25.53(c)(4)(C), I further swear and affirm that: (i) 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; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been conducted to the extent required by 16 TAC § 25.53(f); (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) that BRI maintains a business continuity plan that addresses returning to normal operations after disruption caused by an incident; and (vi) BRI'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 Systems training.

I further swear or affirm the information, statements and/or representations contained in the EOP are true, complete, and correct to the best of my knowledge and belief.



SUBSCRIBED AND SWORN to before me on this 29th day of August 2023.



Jennifer B. Rogers

08/29/2023 03:41 PM CDT

Notary Public in and for the State of Texas

# **EMERGENCY OPERATIONS PLAN**

BRP IntermediateCo I LLC 333 Clay St., Suite 2800 Houston, Texas 77002

# Emergency Operations Plan BRP IntermediateCo I LLC

Power Generation Company (PGC)

Version 1.0 Effective Date: August \_,2023

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#### Approval and Implementation

This Emergency Operations Plan (EOP) is developed to help ensure safe and optimal performance of BRP IntermediateCo's I LLC (BR Intermediate) power generation assets during emergency conditions, including, pandemic(s) and severe weather. This plan includes the necessary plan elements required by PUCT Rule §25.53. This EOP is applicable to PGC Registration No. \_\_\_\_\_\_, and is applicable to all generation resources attributable thereto. This EOP will also be applicable to any future generation resources added to BR Intermediate PGC registration as approved by the Commission.

The following individuals are responsible for maintaining, implementing, and revising the EOP.

Name	Title	Permission(s)
Doug Moorehead	Chief Operating Officer	Maintain
Gabriel Liguori	Director, Asset Management	Maintain
Peter Coladarci	Manager of Real-time Operations	Implement
Stacey Greene	Manager, HSE	Revise

#### Revision Control History

Version	Approval Date	Effective Date	Revision Summary
1.0			Initial Emergency
1.0			Operations Plan

#### **Emergency Contacts**

The following primary and backup emergency contacts are those who can immediately address urgent requests and questions from the Commission during an emergency:

#### Primary:

- Doug Moorehead, Chief Operating Officer, dmoorehead@broadreachpower.com, 757-328-3309
- Lindsey Hughes, Vice President External Affairs, <a href="mailto:lhughes@broadreachpower.com">lhughes@broadreachpower.com</a>, 512-771-8622

#### Backup:

 Narsimha Misra, Chief Commercial Officer, nmisra@broadreachpower.com, 832-458-2831

#### Communication Plan

During emergency operations, BR Intermediate will use the contact information provided in the table below. Please see Attachment C, Emergency Staffing Schedule, for a list of BR Intermediate internal contact information.

EMERGENCY OPERATIONS CONTACT LIST (EXTERNAL)				
NAME	ENTITY	PHONE NUMBER		
Shift Supervisor	ERCOT	512-248-3105		
QSE Agent	APX	408-878-1852		
PUCT Infrastructure Staff	PUC	512-936-7197		
OPUC	OPUC	512-936-7500		
TNMP Real-time Operations	TNMP	281-581-4762		
LCRA Real-time Operations	LCRA	800-223-7622		
AEP Real-time Operations	AEP	866-871-3479		
CPS Real-time Operations	CPS	210-353-4362		
STEC Real-time Operations	STEC	361-485-6300		
Oncor Real-time Operations	Oncor	214-743-6897		

Additionally, BR Intermediate will use the following procedures for communicating with the specified entities during an emergency:

- Media: BR Intermediate Vice President, External Affairs will review and coordinate all incoming and outgoing media communications.
- PUCT: The identified BR Intermediate contacts listed in the section "Emergency Contacts" are those who can immediately address urgent requests and questions from the Commission during an emergency. If further information or review is required during this communication, the identified Emergency Contacts can request BR Intermediate's Vice President-External Affairs to initiate and coordinate with the appropriate departments. The BR Intermediate Vice President, External Affairs will then serve as the point of contact for the remainder of that specific request.
- OPUC: BR Intermediate's Vice President, External Affairs will review and coordinate all incoming and outgoing communications to OPUC.
- Fuel Suppliers: Not applicable. All BR Intermediate assets are Energy Storage Resources that receive energy from the distribution/transmission electrical grid.
- Local and State Governmental Entities, Officials, and Emergency Operations Centers: BR
  Intermediate's Vice President, External Affairs shall manage all communications with
  government officials. In the event of an urgent situation, communications with Local and
  State Governmental Entities, Officials, and Emergency Operations Centers may first be
  initiated by BR Intermediate Field Services or BR Intermediate remote real-time

operations personnel using Attachment J "BRP Site Address and Emergency Phone Numbers". For non-urgent communication, BR Intermediate Field Services, in coordination with BR Intermediate's Vice President, External Affairs may communicate the issue with BR Intermediate Asset Management, who will then utilize Attachment J and serve as point of contact for the remainder of the specific request.

 ERCOT: BR Intermediate real-time operations will serve as the point of communication with ERCOT.

#### Definitions and Acronyms

TERM	ACRONYM	DEFINITION
Annex		A section of an emergency operations plan that addresses how an entity plans to respond in an
		emergency involving a specified type of hazard or threat.
<u>Drill</u>		An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Electric Reliability Council of Texas	ERCOT	Independent System Operator for approximately 90% of the state of Texas.
Emergency		A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity		An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<u>Hazard</u>		A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Power Generation Company	PGC	Generates electricity intended to be sold at wholesale and does not own a transmission or distribution facility

		in this state (with some exceptions, see PUC Substantive Rule 25.5(23) and 25.5(45)).
Public Utility Commission of Texas	PUCT	The PUCT is the regulatory body for energy entities in the state of Texas.
Qualified Scheduling Entity	QSE	Submit bids and offers on behalf of resource entities (REs) or load serving entities (LSEs) such as retail electric providers (REPs).
State Operations Center	soc	The SOC is operated by TDEM on a 24/7 basis and serves as the state warning point.
Texas Department of Energy Management	TDEM	coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters.
<u>Threat</u>		The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

### Purpose and Filing Requirements

As a registered PGC, in the ERCOT footprint, BR Intermediate is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. As such, BR Intermediate has developed this plan to comply with the PUCT Substantive rule, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) concurrently with submission of its PGC application, (b) for calendar year 2024, by April 18th if it has been granted PGC approval by that time (as the April 15, 2022 deadline has been extended by the Commission), or (c) beginning in 2024, annual updates to the EOP must be filed by March 15th in the circumstances outlined by § 25.53(c)(3). At all times, the most recently approved copy of the BR Intermediate's Emergency Operations Plan must be available at the main office for PUCT inspection.

### Asset Design and Operations

All current BR Intermediate assets share similar designs with respect to weather preparedness and temperature control. As built, these assets will have many qualities that allow for exceptional extreme-weather performance. These will include:

- Our onsite generation equipment (battery modules) is thermally isolated/protected and temperature regulated by a 24/7 enclosed HVAC system.
- 2. Our assets do not have weather exposed fuel or generation components.
- Our assets are built to perform at rated capacity in operating ambient temperatures of -5F to 113F for our 10MW sites and -13F to 122F for our 100MW sites.
- 4. Where applicable, our assets are built on raised platforms above pertinent floodplains.
- 5. All BESS installations are remotely monitored and operated.

#### Maintenance of Pre-identified Supplies for Emergency Response

As described in the Asset Design and Operations section, BR Intermediate assets are remotely monitored, operated and designed such that procurement of additional emergency supplies is limited to spare parts that have historically required periodic replacement. A list of some of these supplies is contained below.

- Fuses
- Communication connectivity devices such as wiring and adapters.
- Local controller relays
- Other miscellaneous parts that have historically required periodic replacement.

#### Staffing During Emergency Response

BR Intermediate shall identify operational and management staff that will remain on call or on stand-by for the duration of the emergency (Attachment C). This list may be dynamic and will be subject to change should conditions warrant it.

Critical business functions are those functions and critical activities that BR Intermediate must maintain during an emergency to avoid or mitigate a disruption to normal operations. Refer to Attachment E for a description of these critical business functions.

In the case of a weather emergency that requires evacuation of the Houston real-time operations control-center, BR Intermediate maintains a "go-box" that contains monitors and a wireless hotspot so that control-room personnel can remotely work from anywhere in the United States. The primary contact number for BR Intermediate control-room operations is a web-based number that only requires an internet connection, therefore communication channels with external entities is maintained. This scenario has been tested and proved effective.

#### Weather-related Hazard Identification and EOP Activation

BR Intermediate actively monitors all potential extreme weather events that may affect their facilities, to identify severe weather impacts and operational circumstances that might arise. BR Intermediate uses a variety of services that provide monitoring and alerting capabilities for extreme weather conditions on a 24/7 basis, including Indji Watch, Accuweather Pro, Windy.com, and Stormvista. These services provide appropriate monitoring capability for tornado, hurricane, extreme hot weather, extreme cold weather, drought, and flooding conditions.

<u>Hurricane or tropical storm.</u> Notifications can be called when there is a probability of landfall in the ERCOT Region. ERCOT Meteorologist will provide the forecasts to supplement other Weather Service data information. ERCOT's operations support and Outage Coordination will analyze the situation and make recommendations as to Resource requirements and transmission topology.

Extreme Cold Weather. Extreme cold weather notifications can be issued when temperatures are forecasted to be 25 degrees (Fahrenheit) or below in the North Central and in the South-Central weather zones. Wind chill also has an impact on how the temperature feels due to the flow of lower temperature air. When the wind chill is forecasted to be 20 degrees or below in the North Central and in the South-Central weather zones, a notification may be issued. For such events, additional reserves may be necessary and the sequence of actions and/or notifications may vary due to system conditions or other operational issues.

Extreme Hot Weather. Extreme hot weather notifications can be issued when temperatures are forecasted to be 103 degrees (Fahrenheit) or above in the North Central and South-Central weather zones. Notifications can also be issued when temperatures are forecasted to be 94 degrees or above in the North Central and South-Central weather zones during the following months (October-May). For such events, additional reserves may be necessary and the sequence of actions and/or notifications may vary due to system conditions or other operational issues.

Other Significant Weather Events. Significant weather events are those that do not meet the criteria of extreme hot, extreme cold, hurricane, or tropical storm procedures. Significant weather events can consist of, but are not limited to the following:

- (1) Tornadoes
- (2) Strong straight-line winds
- (3) Hail
- (4) Severe lightning
- (5) Flooding

- (6) Freezing precipitation
- (7) Hard freeze

Upon notification of an ERCOT declared OCN for approaching extreme weather conditions, BR Intermediate will initiate an internal notification and briefing with those listed in the Emergency Staffing Schedule. The BR Intermediate internal briefing will include a review of potential impacts and a decision on EOP activation.

#### Annexes Required for a Power Generation Company

The following annexes must be included in the Emergency Operations Plan for a Power Generation Company.

#### Weather Emergency Annex

As described in the Asset Design and Operations section, BR Intermediate assets are built such that significant advanced preparation in response to an impending weather-related event is not necessary. However, BR Intermediate provides the following information on its cold and hot weather emergency prevention and operation measures.

**Prevention:** BR Intermediate conducts monthly inspections and maintenance of all assets to ensure proper function of HVAC systems and structure integrity.

The BR Intermediate maintenance schedule also includes inspection and preventative maintenance of critical medium-voltage and high-voltage transmission equipment on a monthly, quarterly, and triennial basis, including:

- Medium and High Voltage Transformers
- Disconnect Switches
- Reclosers and circuit breakers
- Potential and Current Transformers
- Lightning Arrestors
- Pad Mounted Transformers
- Underground cables

#### Operation:

 Visual inspections of key systems monthly. While we already perform monthly visual inspections, BR Intermediate does prepare for added inspections in the leadup to any extreme weather event.  24/7 cell temperature monitoring. Our operations group is able to monitor internal cell temperatures in real time and can deploy a proprietary response if temperatures approach or breach acceptable limits.

A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels Not applicable as BR Intermediate assets are not capable of utilizing alternative fuel.

Checklist(s) for generating facility personnel to address emergency events Not applicable as all BR Intermediate assets are remotely operated.

A water shortage annex that addresses supply shortages of water used in the generation of electricity:

Not applicable as BR Intermediate assets do not use water to generate power.

A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;

The BR Intermediate plan for emergency operation addresses its process for recovering generation capacity, should an emergency force a derate, a unit trip, or inability to generate and fulfill its MW obligations. These actions are listed in Attachment D.

#### A pandemic and epidemic annex;

The BR Intermediate Pandemic Response Plan (Attachment F) contains this information.

A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;

The BR Intermediate Hurricane Plan (Attachment K) contains this information.

#### A cyber security annex;

The BR Intermediate Cyber Security Incident Response Policy (Attachment G) contains this information.

#### A physical security incident annex;

This section contains reporting for physical threats to any BR Intermediate facility, as well as actual damage to or destruction of any BR Intermediate facility, per NERC Reliability Standard EOP-004. The DOE digital form, <u>OE-417</u> shall be used to communicate physical attacks and cyber security incidents.

The BR Intermediate Cyber Security Incident Response Policy (Attachment G) contains this information.

#### **PUC Filing Requirements**

An entity must file an emergency operations plan (EOP) and executive summary by April 15, 2022.

- A. An entity must file with the commission:
  - an executive summary that:
    - describes the contents and policies contained in the EOP;
    - includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
    - includes the record of distribution required under paragraph (4)(A) of this subsection; and
    - contains the affidavit required under paragraph (4)(C) of this subsection;
  - a complete copy of the EOP with all confidential portions removed.
- B. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.
- C. In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:
  - i. A record of distribution that contains the following information in table format:
    - titles and names of persons in the entity's organization receiving access to and training on the EOP; and
    - dates of access to or training on the EOP, as appropriate.
  - A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
  - iii. An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
    - 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;
    - II. the EOP has been reviewed and approved by the appropriate executives;
    - drills have been conducted to the extent required by subsection (f) of this section;
    - IV. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;

- the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- VI. the entity'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.

#### Annual Review

An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

- A. An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:
  - a. file with the commission an executive summary that:
    - i. describes the changes to the contents or policies contained in the EOP;
    - ii. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
    - iii. includes the record of distribution required under paragraph (4)(A) of this subsection; and
    - iv. contains the affidavit required under paragraph (4)(C) of this section;
  - file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
  - submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.
- B. An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:
  - a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;
  - an attestation from the entity's highest-ranking representative, official, or officer
    with binding authority over the entity stating the entity did not make a change to
    its EOP that materially affects how the entity would respond to an emergency; and
  - c. the affidavit described under paragraph (4)(C) of this subsection.

#### Annual Drill

An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity

BRP IntermediateCo I LLC 333 Clay St., Suite 2800 Houston, Texas 77002

conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

By applying the Emergency Operations Drill Instructions and completing Attachment B, BR Intermediate's Emergency Operations Plan shall be tested each year, no later than February 15th, and include a review section, to identify and correct any vulnerabilities in the Emergency Operations Plan. BR Intermediate's Emergency Operations Drill Procedure has a specific requirement for any generation facility that is located within a defined hurricane evacuation zone.

BR Intermediate, as a registered RE, shall provide ERCOT with any updated versions of their emergency operations plan by **June 1** for any updates made between November 1 and April 30, and by **December 1** for any updates made between May 1 through October 31. BR Intermediate shall submit all updated plans electronically.

## **ATTACHMENT A**

Cyber Security Inciden	Cyber Security Incident Response Policy	
Date:	2023-08	
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## Attachment A – ES-ISAC Reporting Cross-Reference Matrix

This cross-reference is provided for convenience. It is not intended to be inclusive.

Source: Appendix A from ES-ISAC's Threat and cyber security incident Reporting Guideline

Category	Sub-Category	Event Definition	Consider Reporting When:	Report Within:	Cross-Reference to Reporting Requirements			
SABOTAGE/	Security Breaches:							
TAMPERING/ VANDALISM (STV) – Physical or Cyber	Physical Perimeter Compromise	Unauthorized access of a person or a device through, circumventing, or damaging the physical perimeter, or security systems protecting the physical perimeter.	Unauthorized physical access to facilities, systems, or equipment (such as critical assets or critical cyber assets) that could impact the reliable operation of the bulk electric system; or, intentional damage to security systems that protect the physical perimeter.	1 hour of detection				
	Cyber Perimeter Compromise	Unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device.	Unauthorized electronic access to cyber assets whose impairment could impact the reliability of the	1 hour of detection				
	Information Theft or Loss	Unauthorized removal or loss of sensitive information.	Sensitive information, such as that required to be protected pursuant to NERC Standard CIP-003 is lost or is removed without authorization.	48 hours of detection	ES-ISAC			
	Unauthorized Modification	Unauthorized addition or modification of software or data associated with the proper operation of cyber assets.	Malicious software or data modification is discovered on a cyber-asset or assets that may impact the reliability of the bulk power system.	4 hours of detection	DHS ES-ISAC			
	Suspected Activitie	Suspected Activities:						
	Attempted Physical Intrusion	A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success.	Attempt to gain unauthorized physical access to facilities, systems, or equipment (such as critical assets or critical cyber assets) that could impact the reliable operation of the bulk power system is targeted, focused, or repetitive.	6 hours upon detection				
	Attempted Cyber Intrusion	A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success.	Attempt to gain unauthorized electronic access to cyber assets (such as critical cyber assets) whose impairment could impact bulk power system reliability is targeted, focused, or repetitive.	6 hours upon detection				
	Surveillance Activit	ies - Intelligence Gathering:						

Cyber Security Incident Response Policy	
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Social Engineering	The attempt by an unauthorized person to manipulate people into performing actions or divulging information.	Suspected or actual instance occurs.	8 hours of recognition	DHS ES-ISAC
Photography	Taking still or moving pictures.	A suspicious cyber security incident occurs.	8 hours	DHS ES-ISAC
Observation	Showing unusual interest in a facility; for example, observing it through binoculars, taking notes, drawing maps, or drawing structures of the facility.	Activity is suspicious or unauthorized.	8 hours	DHS ES-ISAC
Flyover	Flying an aircraft over a facility; this includes any type of flying vehicle including an unmanned aerial vehicle (UAV) loitering over a site.	A suspicious or unauthorized cyber security incident occurs.	8 hours	DHS ES-ISAC
Threats:				
Expressed Threat	Communicating a threat.	Threatened action has the potential to damage or compromise a facility or personnel.	1 hour	DHS ES-ISAC
Weapons Discovery	Discovery of explosives.	Discovery occurs at or near a facility.	1 hour	ES-ISAC
Attacks:				
Actual Attack (Physical or Cyber or Communication)	Attack via physical, cyber, or communications means.	An actual attack against generation, transmission, or company-owned or operated communication facilities, cyber assets, or personnel occurs.	1 hour	
Attempted Attack (Physical or Cyber or Communication)	Attack via physical, cyber, or communications means.	A suspected attack against generation, transmission, or company-owned or operated communication facilities, cyber assets, or personnel occurs.	6 hours	
				1

Cyber Security Incident Response Policy	
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## ATTACHMENTS B – E

# ATTACHMENT B - EMERGENCY OPERATIONS DRILL BROAD REACH POWER Section 2.2.1 ACTION NAME COMPLETE NOTES **VULNERABILITIES AND ISSUES IDENTIFIED & CORRECTIVE ACTIONS** ACTION NAME CORRECTIVE ACTION TASK COMPLETE DATE NOTES

#### ATTACHMENT C - EMERGENCY STAFFING SCHEDULE



NAME	LOCATION	CONTACT INFORMATION	DUTIES	
Peter Coladarci	Houston - Remote Office	224-420-6476	Real-time Operations and Dispatching	
Carlis Miller	Houston - Field Services	832-287-0029	Field Services	
Paul Thompson	Houston - Field Services	229-630-7793	Field Services	
German Cortes	Houston - Field Services	281-224-6383	Field Services	
Sabriel Roy Liguori	Houston - Remote Office	617-633-2080	Asset Management	
Ram Rao	Houston - Remote Office	617-519-5800	IT:	
Casey Kopp	Houston - Remote Office	585-748-9378	Trading	
Guillaume Dufay	Houston - Remote Office	346-561-4123	Asset Management	
Doug Moorehead	Houston - Remote Office	757-328-3309	Asset Management	
Ashley Waggoner	Houston - Remote Office	785-979-1544	Human Resources	
Sally Shaw	Houston - Remote Office	713-962-3719	Legal	
Stacey Greene	Houston - Remote Office	832-515-6576	HSE	

## ATTACHMENT E - GENERATION CAPACITY RECOVERY PRIORITIES Section 2.1.1.10



ID.	ASSIGNED TO	TASK	COMPLETE	DATE	NOTES
1	Real-time operations	Review and log all alarms and fault codes			
2	Real-time operations	Determine if site can be safely restored remotely. If yes, skip to ID 10. If site cannot be safely restored remotely, continue with ID 3.			
3	Real-time operations	Contact Field Service Personnel to evaluate mobilization to site.			
4	Field Service Personnel	Upon arrival at site, assess situation and determine if personnel can safely enter the site. Contact appropriate local emergency services if safe entry cannot be confirmed. Communicate situation with Real-time operations. If safe to access site, proceed to ID 6. If unsafe to enter, continue with ID 5.			
5	Field Service Personnel	If unsafe to enter, implement Emergency Contact Plan for site. After arrival and assessment by emergency contact, confirm and communicate all-clear with Real-time Operations before proceeding to next step.			
6	Field Service Personnel	Contact Real-time Operations prior to site entry.			
7	Real-time operations	Clear Field Service Personnel to enter site.			
8	Field Service Personnel	Review on-site alarms, fault codes, and physical state of asset and determine plan of action.			
9	Field Service Personnel	Communicate action plan with Real-time operations. Implement after communicated.			
10	Real-time operations	Before restoring site, communicate restoration plan with connecting TDSP, QSE agent, and ERCOT.			
11	Real-time operations	Restore site and confirm valid communication with site.			
12	Real-time operations	Confirm restoration with TDSP, QSE agent, and ERCOT.			

#### BRP IntermediateCo Company Critical Business Function

Critical Business Function 1: Monitoring and Dispatching Assets

Business Process To Complete: Monitor and dispatch assets to meet market obligations

	Supporting Elen	ments	
Supporting Activities (Describe)	Lead POC	Vendors and External Contacts	Maximum Allowed Down Time
Supporting Activities (Describe)	Alternate	vendors and External Contacts	Criticality
Monitor and dispatch	Manager, Real-time Operations	APX (QSE Agent)	0
Monitor and dispatch	Associate, Real-time Operations	ATA (QSE Agent)	High
Communication with TDSPs and ERCOT	Manager, Real-time Operations	APX (QSE Agent)	0
	Associate, Real-time Operations		High
Internal Communication	Manager, Real-time Operations	N/A	0
	Associate, Real-time Operations		High

Implications if not Conducted: Interruption and/or loss of this function would disrupt ability to control assets and meet market obligations. This could lead to compliance and market penalities.

Calendar Dependent: This function is always occurring.

Required Resources: Staff, equipment, supplies, Information Technology, and other resources. Broad Reach maintains a "go-box" that contains additional monitors and a wireless hotspot so that control-room personnel can remotely work from anywhere in the United States. This scenario has been tested and proved effective.

Facilities: This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet.

#### BRP IntermediateCo Company Critical Business Function

Critical Business Function 2: Asset Management

Business Process To Complete: Respond to troubleshooting/repair requests from real-time operations

Supporting Elements				
Supporting Activities (Describe)	Lead POC	Vendors and External Contacts	Maximum Allowed Down Time	
Supporting Activities (Describe)	Alternate	vendors and External Contacts	Criticality	
Troubleshooting Coordination	Manager, Asset Management	Saber CAMS NAES	0	
	Associate, Asset Management	IVALIS	High	
Field Services	Associate, Asset Operations	Saber CAMS	0	
	Associate, Asset Operations	NAES	High	

Implications if not Conducted: Interruption and/or loss of this function would disrupt ability to maintain assets online through troubleshooting conditions. Furthermore, it would result in a delay of the capability to bring assets back online after tripping or faults.

Calendar Dependent: This function is always occurring.

Required Resources for Troubleshooting Coordination: Staff, equipment, supplies, Information Technology, and other resources.

Required Resources for Field Services: Staff, field service equipment, supplies, Information Technology, and other resources.

Facilities for Troubleshooting Coordination: This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet.

Facilities for Field Services: N/A as work is done in the field at asset location.

	BRP IntermediateCo C	Critical Business Function	
Critical Business Function 3: Trading			
Business Process To Complete: Submit D	ay-Ahead Market bids		
	Supporti	ng Elements	
Supporting Activities (Describe)	Lead POC	Vendors and External Contacts	Maximum Allowed Down Time
Supporting Activities (Describe)	Alternate	vendors and External Contacts	Criticality
Daily Bid Submission	Manager, Trading	APX (QSE Agent)	1
	Associate, Trading		Med

Implications if not Conducted: Interruption and/or loss of this function would disrupt ability to submit Day-Ahead Market bids and receive awards.

Calendar Dependent: This function is always occurring.

Required Resources: Staff, equipment, supplies, Information Technology, and other resources.

Facilities: This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet.

	BRP IntermediateCo Critical B	usiness Function	
Critical Business Function 4: Information T	echnology		
Business Process To Complete: Maintain an	d troubleshoot network connectivity for all cri	tical business functions	
	Supporting Element	ts	
e	Lead POC	Vendors and External Contacts	Maximum Allowed Down Tim
Supporting Activities (Describe)	Alternate		Criticality
Network Maintenance Troubleshooting	Director, Critical Asset Operations	Enstep	0
	Associate, Network and Cyber Security		High
Implications if not Conducted: Interruption	and/or loss of this function would disrupt abil	ity for all critical business functions.	

Calendar Dependent: This function is always occurring.

Required Resources: Staff, equipment, supplies, Information Technology, and other resources.

Facilities: This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, co

## **ATTACHMENT F**

# Pandemic Response Plan BRP IntermediateCo I LLC

Power Generation Company (PGC)

Version 1.0 Effective Date: August \_\_\_, 2023

## Contents

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### **Executive Summary and Approval**

#### Introduction:

In light of recent events related to pandemics and epidemics, BRP IntermediateCo (IntermediateCo) has developed this plan (PRP) to address the subject of business continuity, in the face of a widespread medical event, such as a pandemic or an epidemic. This Plan provides a framework, guidance, and concept of operations to support BRP's efforts to continue and/or rapidly restore critical business functions in the event of a disruption to normal operations. This plan includes an overview of continuity operations, outlines the approach for supporting BRP's critical business functions, and defines the roles and responsibilities of staff. It also outlines the orders of succession, notification procedures and communication methods, plan activation and deactivation protocols, provisions for alternate work locations, and the plan for maintaining and restoring access to vital records.

This plan establishes procedures and processes to maintain operational continuity for businesses based on the loss of services due to a reduction in workforce (e.g., during pandemic influenza).

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)
Stacey Greene	HSE Manager	Maintain
Peter Coladarci	Manager of Real-time Operations	Implement
Stacey Greene	HSE Manager	Revise

Version	Approval Date	Effective Date	Revision Summary
1.0	08//23	08//2033	Initial Pandemic and Epidemic Response Plan

#### Introduction

#### Overview:

Continuity of Operations planning ensures IntermediateCo is able to continue or quickly resume performing critical business functions, which are the functions that support the organization's mission, comply with legal requirements, and support life-safety, under all circumstances, to the extent possible. The benefit of this planning includes the ability to anticipate response

actions following a pandemic or epidemic, improve the performance of its generating and operations facilities, and ensure timely recovery.

#### Plan Scope & Applicability:

The IntermediateCo Pandemic Response Plan is applicable once the safety of employees, customers, and guests has been verified. It can be active during normal business hours and after hours, with and without warning.

#### Plan Objectives:

The objective of the IntermediateCo is to facilitate the resumption of critical operations and functions in a timely and organized manner to ensure a viable and stable organization. In doing this it is critical to ensure the safety and well-being of employees, customers, and guests. The primary objectives of the plan are to:

- Maintain Critical Business Functions during the pandemic or epidemic
- Adjust business functions to address staffing issues
- Ensure employees are able to perform work remotely, where applicable and appropriate

#### Plan Assumptions:

The following assumptions were used while creating this plan:

- An event has occurred that affects normal business operations.
- Access to BRP facilities may be limited.
- Qualified personnel are available to continue operations.

#### Critical Business Functions

#### Overview:

Critical business functions are those functions and critical activities that IntermediateCo must maintain in a continuity situation, when there has been a disruption to normal operations, in order to sustain the mission of the organization, comply with legal requirements and support life-safety. They are the backbone of business and must be continued in order for BRP to continue to meet its mission. Refer to Attachment E of the IntermediateCo-EOP-1 Emergency Operations Plan, Critical Business Functions, for a description of these critical business functions

#### Identification of Staff Required to Continue Business Operations:

In the event of a pandemic or epidemic, work absences, due to medical issues attributed to the widespread medical event, can lead to dramatic decreases in productivity, potentially leading to the shutdown of facilities. To maintain the best possible operational posture, it is imperative to

communicate duties to the appropriate personnel, helping to ensure BRP's facilities can remain operational to the greatest extent possible. In many cases, employees may log in remotely and perform their duties, fostering as much of an illness-free atmosphere possible, however, there will be the need for onsite staff to maintain and operate facilities, leading to the identification of mission essential staff and reporting structures. BRP senior management will identify those mission essential individuals and will communicate tasks to them. As each case may differ, there will be no "One-size-fits-all" approach, and each response to a pandemic or epidemic will require its own set of responsible personnel and tasks. It is imperative that all possible measures are taken to keep BRP staff from contracting or spreading the illness. Maintaining social distancing, where appropriate and possible, wearing proper PPE, and maintaining hygienic work and living spaces is crucial to combatting a widespread medical event. Depending on the nature of the event, the measures below may serve to facilitate the continued operations of BRP facilities:

- Wearing of PPE
  - Masks
  - Social distancing
  - Proper hygiene
  - Eye, face, or other protection (as applicable)
- Remote work, where appropriate and possible
- Encourage the use of approved medications and/or vaccine(s)

#### Plan Activation Procedures

#### Plan Activation During Normal Business Hours:

If it is determined that the facility cannot be re-inhabited, the Business Owner or designee will inform personnel on next steps. Employees may be instructed to go home to await further instructions or move to an alternate site. Further communications, such as instructions on where and when to report for work will be made using communication methods such as email, phone calls, texts, or other communication methods.

#### Plan Activation Outside Normal Business Hours:

If an event occurs outside normal business hours that renders a facility uninhabitable, the Business Owner or designee will activate the PRP using email, phone calls, texts, or other communication methods.

#### Actions upon Activation:

Upon activation of the PRP, the Business Owner or designee will be responsible for notifying all affected personnel of their duties and where they will be performing those duties (remotely or at a site).

#### Plan Deactivation Procedures

#### Overview:

PRP deactivation is the process of demobilizing the alternate facility and restoring critical business functions to the primary facility or a new facility that will permanently replace the damaged facility. Plan deactivation may not consist of an exact replacement of lost facilities, equipment or processes. The goal of plan deactivation is to reestablish full capability in the most efficient manner. In some continuity incidents, extensive coordination may be necessary to backfill staff, procure a new operating facility, and re-establish vital records. When it is determined the PRP activation has ended, all personnel should be informed that the necessity for continuity operations no longer exists and the return to normal operations will begin.

#### Criteria for PRP Deactivation:

The business owner or designee will determine, based on input from medical authorities, staff, or other entities when it is safe and when the organization is prepared to restore or transfer critical business functions to a facility for long term usage. Critical business functions must be restored in priority sequence based upon the classification and criticality of the function. The following elements are typically completed prior to plan deactivation.

- Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort.
- Temporarily suspend non-critical functions, as necessary, to support the resumption
  efforts
- As applicable, utilize other personnel, such as contract personnel, to support the resumption efforts.

Table 1 details the restoration process that must be completed during plan deactivation.

Table 1

Item	Function	Supplies	Required Resources
1	Monitor current CDC guidelines for indication of safe plan deactivation	N/A	HR in coordination with senior leadership will monitor CDC guidelines to determine when it is safe to restore critical business functions to standard operating locations.
2	Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort	Medical supplies, such as face coverings, hand washing stations, as well as proper arrangement of office seating to meet CDC guidelines for social distancing.	HR in coordination with senior leadership
3	Conduct return to normal operations briefing	N/A	HR coordinate and present briefing on return-to-work procedures with all employees
4	Continue to monitor CDC guidelines and adherence to latest revisions	N/A	HR in coordination with senior leadership will continue to monitor CDC guidelines and adjust procedures as needed.

# **ATTACHMENT G**

## BRP IntermediateCo I LLC 333 Clay St., Suite 2800 Houston, Texas 77002

**Document Type: Policy** 

## BRP IntermediateCo I LLC Cyber Security Incident Response Policy

Version Control			
Version #	Date	Content	Justification
1.0	2023-08	Initial Version	n/a

Prepared by:	Reviewed by:	Reviewed by:	Approved by:
Ram Rao	Doug Moorehead	Sally Shaw	Stacey Peterson
Ram Das Rao	W. A. WOOLING May 24 2023 14 (37 E/17)	Sally Shand Aud 28, 2023 13:42 CDT)	Stacey Peterson (Aug V8, 2023 14:35 CDT)
Title: SVP, Software, Platform & Integration Engineering  Dpt.: Asset Management	Title: Chief Operating Officer Dpt.: Operations	Title: Chief Legal Officer Dpt.: Legal, Regulatory, Compliance & Policy	Title: Chief Executive Officer Dpt.: Executive
Date: August 28, 2023	Date: August 28, 2023	Date: August 28, 2023	Date: August 28, 2023

	Document Type:	Policy
BRP IntermediateCo Cyber Security Incident Response Policy	Date:	2023-08-28
	Issue:	

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	Document Type:	Policy
BRP IntermediateCo Cyber Security Incident	Date:	2023-08
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#### 1 Purpose

This policy defines Cyber Security Incident Responses for BRP IntermediateCo and the entities governed by the NERC CIP Standards for Low-Risk ESS's.

BRP IntermediateCo is committed to developing and maintaining a Cyber Security Incident response plan and to reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). Any act or event that could be considered a Cyber Security Incident will be evaluated and reported as appropriate, in accordance with the steps outlined below.

#### 2 Scope of Application

This policy applies to BRP IntermediateCo personnel (including contractors and service vendors) with authorized cyber or authorized unescorted physical access to covered Cyber Assets.

#### 3 Definitions & Acronyms

- Roles and Definitions can be found in the BRP IntermediateCo Master Definitions List.
- The use of any defined term will be capitalized.

#### 4 Areas Involved

While no groups within BRP IntermediateCo are exempt from this policy, the following groups have specific responsibilities and/or need to be familiar with the policy:

- SVP, Software, Platform & Integration Engineering
- IT Service Provider
- IT Operations Manager
- IT Security Engineer
- Operation Center Manager
- SCADA Manager
- Help Desk

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- Cyber Security Incident Response Team
- Cyber Security Senior Manager or Delegate

#### 5 Compliance Requirements

#### 5.1 Cyber Security Incident Response Plan

BRP IntermediateCo shall develop, implement and maintain a Cyber Security Incident response plan in response to Cyber Security Incidents. This policy, along with the <a href="mailto:BRP IntermediateCo Cyber Security Incident Response Procedure">BRP IntermediateCo Cyber Security Incident Response Plan as called for by the NERC Cyber Security Standards for Low-Risk ESS's.</a>

#### 5.2 Cyber Security Incident Response Team

A Cyber Security Incident Response Team (CSIRT), comprised of the following members, will handle response to Cyber Security Incidents:

- SVP, Software, Platform & Integration Engineering (Lead)
  - Declares Cyber Security Incident as reportable to ES-ISAC
  - Notifies CSIRT of Cyber Security Incident
- IT Security Engineers-third party IT Service Provider
  - Primary technical advisor to the SVP, SPIE
  - Monitors systems and networks
  - Evaluates logs and other data and technical information to investigate the security incident
  - In an emergency situation may act to minimize damage to BRP IntermediateCo systems before communicating with the SVP, SPIE
- CIP Senior Manager or Delegate-third party IT Service Provider
  - Perform oversight activities
  - Manage scheduling of periodic reviews
  - Schedule the annual test of the Cyber Security Incident Response Plan
- Sr. Manager, OPCENTER
  - Determine impact of the incident with regard to real-time system operations

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 Coordinate OPCENTER actions to minimize the impact to essential OPCENTER processes and applications

#### SCADA Manager

 Determine impact of the incident on OPCENTER applications and report to the Sr. Manager, OPCENTER

#### 5.3 Discover

All BRP IntermediateCo personnel are required to contact the Help Desk immediately if they suspect a cyber security incident.

#### 5.4 Characterize, Classify, Resolve

CSIRT will use the ES-ISAC Reporting Cross Reference Matrix in Attachment A to determine the type and severity of an incident and whether or not the incident must be categorized as an ES-ISAC reportable incident. Each Cyber Security Incident will be categorized as either being a reportable incident or not.

Notification of the ES-ISAC, if needed, will be performed by the Director of Information Technology. The steps for doing so are specified in the <u>BRP IntermediateCo Cyber Security Incident Response Procedure</u>.

#### 5.5 Document

Cyber Security Incidents will be documented. Evidence will be preserved and protected per the <u>BRP IntermediateCo Cyber Security Incident Response</u> Procedure.

Documentation related to a defined reportable incident will be maintained for three calendar years by IT or its delegated IT Service Provider in designated BRP IntermediateCo SharePoint folder, IT\Documents\Genera\Cyber Security\Cyber Security Incident Reports. Non-reportable incident documentation will be maintained per the BRP IntermediateCo Cyber Security Incident Response Procedure.

#### 5.6 Review and Testing

The BRP IntermediateCo Cyber Security Incident Response Policy and the BRP IntermediateCo Cyber Security Incident Response Procedure will be reviewed annually. The policy, procedure and workflow will be tested annually. This test can take the form of a paper drill, tabletop exercise or full operational exercise and is to be scheduled by the CIP Senior Manager or delegate. This review and testing is

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detailed in the <u>BRP IntermediateCo Cyber Incident Response Annual Review and Testing Procedure</u>.

In addition, the components of the Cyber Security Incident Response Plan will be updated and communicated to all CSIRT members within thirty (30) days of any changes, whether those changes are the result of an incident, a test or review.

Updates to the plan will be stored on BRP IntermediateCo share point folder: IT\Documents\Genera\Cyber Security\Cyber Security Incident Response Plan. All CSIRT members will be notified by email of the updates, and each CSIRT member will demonstrate that the member has reviewed the changes in the update.

#### 6 Training Requirements

BRP IntermediateCo will provide periodic training to new and existing personnel on their regulatory responsibilities. Training for the Cyber Security Incident Response Plan will be provided to the members of the CSIRT and to the document owners for the pieces of the plan. Additional training will be provided to response personnel as needs for capabilities as they are identified.

#### 7 References

- 7.1 NERC CIP-008-4 Cyber Security Incident Reporting and Response Planning
- 7.2 BRP IntermediateCo Cyber Security Incident Response Procedure
- 7.3 BRP IntermediateCo Cyber Incident Response Annual Review and Testing Procedure

#### 8 Attachments

- 8.1 Attachment A: ES-ISAC Reporting Cross Reference Matrix
- 8.2 BRP IntermediateCo Master Definitions List

# **ATTACHMENT J**

## **Odessa Southwest BESS**

Odessa, Texas 3434 South Fulton Ave, Odessa, Texas 79766 31.799862875452295, -102.39110382549114

#### Fire Department

Odessa Fire Rescue (8 Min away) 1100 West 2<sup>nd</sup> St. Odessa, Texas 79763 325-347-6363

#### Police Department

Odessa Police Department (10 min away) 205 North Grant Ave Odessa, Texas 79761 432-333-3641

#### Hospital

500 west 4th Street Odessa, Texas 79761 830-997-4353

## Alternate Fire Department

City of Odessa Fire Station 5 (17 min away) 7155 Eastridge Rd. Odessa, Texas 79765 325-657-4283

#### Alternate Police Department

Midland Police Department (37 Min Away) 601 North Loraine St Midland, Texas 79701 432-685-7108

#### Alternate Hospital

Medical Center Hospital (11 min away) Odessa Regional Medical Center (1 hr. away) 520 East 6th Street Odessa, Texas 79761 432-582-8000

#### Utility Service

Oncor Electric 301 South Dixie Blvd Odessa, Texas 79761 1-888-313-6862



#### Alvin

760-A Heights Road Alvin, Texas 77511 29.43324513387022, -95.2493669581114

#### Fire Department

Alvin Fire Department (2 min away) 110 Medic Ln Alvin, Texas 77511 281-585-8536

#### Police Department

Alvin Police Department (5 min away) 1500 South Gordon St. Alvin, Texas 77511 281-388-4370

#### Hospital

UTMB Health League City Campus Hospital (23 min away) 2240 Gulf Fwy South League City, Texas 77573 409-772-1010

#### Alternate Fire Department

Friendswood Fire Department (7 min away) 2605 West Parkwood Ave Friendswood, Texas 77546 281-992-9494

#### Alternate Police Department

Manvel Police Department (11 min away) 6615 Masters Manvel, Texas 77578 281-489-1212

## Alternate Hospital UTMB Health (30 min away)

2660 Gulf Fwy South #6 League, City, Texas 77573 832-505-2250

#### **Utility Service**

TNMP 2641 Hwy 6 Alvin, Texas 77511 888-866-7456



#### Angleton

415 North Walker St. Angleton, Texas 77515 29.16706507263774, -95.44064699578404

#### Fire Department

Angleton Fire Department (3 min away) 221 North Chenango St. Angleton, Texas 77515 979-849-1265

#### Police Department

Angleton Police Department (6 min away) 104 Cannon Dr Angleton, Texas 77515 979-849-2383

#### Hospital

UTMB Health Angleton Danbury Campus (8 min away) 132 East Hospital Drive Angleton, Texas 77515 979-849-7721

#### Alternate Fire Department

Angleton Fire Department (6 min away) 2743 North Velasco Street Angleton, Texas 77515 979-549-0599

#### Alternate Police Department

Lake Jackson Police Department 5 Oak Drive Lake Jackson, Texas 77566 979-415-2700

#### Alternate Hospital

UTMB Health (5 min away) 1108 A E Mulberry St. Angleton, Texas 409-266-1888

#### **Utility Service**

TNMP 34425 TX-36 West Columbia, Texas 77486 888-866-7456

#### Heights

505 34th Street North Texas, City, Texas 77590 29.38959513468383.-94.94986687931184

#### Fire Department

Texas City Fire Department (6 min away) 1725 North Logan St. Texas City, 77590 409-643-5700

#### Police Department

Texas City Police Department (6 min away) 1004 9th Ave N Texas City, Texas 77590 409-948-2525

#### Hospital

6801 Emmett F Lowry Expy Texas City, Texas 77591 409-938-5000

#### Alternate Fire Department

La Marque Fire Station #2 (7 min away) 1109 Bayou Rd# A La Marque, Texas 77568 409-938-9260

#### Alternate Police Department

La Marque Police Department (5 min away) 431 Bayou Rd La Marque, Texas 77568 409-938-9269

#### Alternate Hospital

HCA Houston Healthcare Mainland (9 min away) UTMB Health League City Hospital (16 min away) 2240 Gulf Fwy South League City, Texas 77573 409-772-1011

#### Utility Service

TNMP 702 36th Street North Texas City, Texas 77590 888-866-7456

#### Magnolia

1301 Floyd Road League City, 77573 29.48833514905432, -95.13394693087155

#### Fire Department

League City Fire Station 1 (10 min away) 601 2<sup>nd</sup> St League City, Texas 77573 281-544-1465

#### Police Department

League City Police Department (10 min away) 555 West Walker St. League City, Texas 77573 281-996-3300

#### Hospital

UTMB League City Hospital (10 min away) 2240 Gulf Fwy South League City, Texas 77573 409-772-1011

#### Alternate Fire Department

Forest Bend Fire Department (13 min away) 2300 Pilgrims Point Dr Webster, Texas 77598 281-332-5209

#### Alternate Fire Department

Friendswood Police Department (14 min away) 1600 Whitaker Dr Friendswood, Texas 77546 281-996-3300

#### Alternate Hospital

Memorial Hermann (8 min away) 2555 Gulf Fwy South League City, Texas 77573 832-932-9900

#### **Utility Service**

TNMP 1207 West Parkwood Ave Friendswood, Texas 77546 888-866-7456

#### Brazoria

1235-A CR 347 Brazoria, Texas 77422 29.06263504663519,-95.5775870264127

#### Fire Department

Wild Peach Fire Station (5 min away) 4172 County Rd. 353 Brazoria, Texas 77422 979-798-2351

#### Police Department

Brazoria Police Department (6 min away) 114 East Texas St. Brazoria, Texas 77422 979-798-2195

#### Hospital

Sweeny Community Hospital (14 min away) 305 North McKinney St. Sweeny, Texas 77480 979-548-1500

#### Alternate Fire Department

Brazoria Fire Department (5 min away) 202 North Brooks St Brazoria, Texas 77422 979-798-2277

#### Alternate Police Department

Sweeny Police Department (15 min away) 123 North Oak St Sweeny, Texas 77480 979-548-3111

#### Alternate Hospital

CHI St. Luke Health (19 min away) 100 Medical Dr. Lake Jackson, Texas 77566 979-297-4411

#### **Utility Service**

TNMP 34425 TX-36 West Columbia, Texas 77486 888-866-7456



#### **Loop 463**

17206 North West Zac Lentz Pkwy Victoria, Texas 77905 28.81647494839809, -97.07486739482162

#### Fire Department

#### Alternate Fire Department

Victoria Fire Department #5 (7 min away) Victoria Fire Department #1 (10 min away)

9508 Zac Lentz Pkwy 606 East Goodwin Ave Victoria, Texas 77904 Victoria, Texas 77901

361-485-3000 361-485-3444

#### **Police Department**

#### Alternate Police Department

Victoria Police Department (9 min away) Port Lavaca Police Department (37 min away)

306 Bridge St.201 North Colorado StVictoria, Texas 77901Port Lavaca, Texas 77979

361-573-3221 361-552-3788

#### Hospital

#### Alternate Hospital

DeTar Hospital Navarro (8 min away) Citizens Medical Center (15 min away)

 506 East San Antonio St
 2701 Hospital Dr

 Victoria, Texas 77904
 Victoria, Texas 77901

 360-573-6100
 361-573-9181

#### **Utility Service**

TNMP 34425 TX-36

West Columbia, Texas 77486

888-866-7456



#### Sweeny

1511 CR372

Sweeny, Texas 77480 29.055614504167131,m -95.68723705408898

Fire Department

Alternate Fire Department

Sweeny Fire and Rescue (5 min away)

Brazoria Fire Department (18 min away)

222 Pecan St

202 North Brooks St Brazoria, Texas 77422

Sweeny, Texas 77480 979-548-3320

Police Department

979-798-2277

Alternate Police Department

Sweeny Police Department (4 min away) West Columbia Police Department (15 min away)

123 North Oak St

310 East Clay St.

Sweeny, Texas 77480

West Columbia, Texas

979-548-3111

979-345-5121

Hospital

Alternate Hospital

Sweeny Community Hospital (4 min away) CHI St. Luke Brazosport Hospital (31 min away)

305 North McKinney St.

100 Medical Dr.

Sweeny, Texas 77480

Lake Jackson, Texas 77566

979-548-1500

979-297-4411

**Utility Service** 

**TNMP** 

34425 TX-36

West Columbia, Texas 77486

888-866-7456



#### Ranch Town

12175 Pablo Hernandez San Antonio, Texas 78023 29.61788505322159, -98.73594784095981

#### Fire Department

#### **Alternate Fire Department**

District 7 Fire Station 117 (3 min away)
District 7 Fire Station Fire Station 116 (5 min away)
185749 Bandera Rd.
Helotes, Texas 78023
Helotes, Texas 78023
210-668-0665
District 7 Fire Station Fire Station 116 (5 min away)
11805 Bandera Rd.
Helotes, Texas 78023
210-688-0665

#### **Police Department**

#### Alternate Police Department

City of Helotes Police (10 min away)
UTSA Police Department (18 min away)
12951 Bandera Rd.
Helotes, Texas 78023
San Antonio, Texas 78249
210-695-3087
210-458-4242

#### Hospital

#### Alternate Hospital

LifeCare Hospitals of San Antonio (27 miles away) St Luke's Hospital(31 miles away) 8902 Floyd Curl Dr 7930 Floyd Curl Dr San Antonio, Texas 78240 San Antonio, Texas 78229 210-690-7000 210-297-5000

#### **Utility Service**

CPS 511 South Salado St San Antonio, Texas 78207 210-353-2222



#### Dickinson

2320 Hollywood St.
Dickinson, Texas 77539
29.46125514600138,-95.05698690993236

#### Fire Department

Dickinson Volunteer Fire Station (4 min away) 4500 FM 517 Rd E Dickinson, Texas 77539 281-534-3031

#### **Police Department**

Dickinson Police Department 4000 Liggio St (4 minutes away) Dickinson, Texas 77539 281-337-4700

#### **Alternate Fire Department**

Dickinson Volunteer Fire Station 2 (4 min away) 221 Farm to Market 517 Rd W Dickinson, Texas 77539 281-534-3031

#### **Alternate Police Department**

League City Police Department 555 West Walker St (10 min away) League City, Texas 77573 281-332-2566

#### Hospital

#### **Alternate Hospital**

Houston Physicians Hospital (8 min away) UTMB Health League City Hospital (9 min away) 333 North Texas Ave #1000 2240 Gulf Fwy, S Webster, Texas 77598 League City, Texas 77573 409-772-1011

#### **Utility Service**

TNMP 702 36<sup>th</sup> St North Texas City, Texas 77590



#### Zapata I and II

3112 State Hwy 16 Zapata, Texas 78076 26.9326745021109,-99.2337078577454

#### Fire Department

Zapata County Fire Department (5 min away) 305 FM 496 Zapata, Texas 78076 956-765-9942

#### Police Department

Zapata County Police Dept (7 min away) 200 7<sup>th</sup> Ave Suite 415 Zapata, Texas 78076 956-765-9960

#### Hospital

Starr County Memorial (1 hr. 3 min) 128 FM 3167 Rio Grande City, Texas 78582 956-487-5561

#### Alternate Fire Department

City of Roma Volunteer Fire Dept (49 min away) 901 East Grant St Roma, Texas 78584 956-849-1770

#### Alternate Police Department

City of Roma Police Department (49 min away) 987 East Grant St Roma, Texas 78584 956-849-2231

#### Alternate Hospital

Mission Regional Medical (1 hr. 50 min away) 900 Bryan Rd Mission, Texas 78572 956-323-9000

#### **Utility Service**

American Electric Power 1519 West Calton Road Laredo, Texas 78041 877-373-4558



#### Pueblo I and II

3301 El Indio Hwy Eagle Pass, Texas 78852 28.67893481292451,-100.463708218579

#### Fire Department

Eagle Pass Fire Station (3 min away) 2558 El Indio Hwy. Eagle Pass, Texas 78852 830-757-4291

#### Police Department

701 Potro St Eagle Pass, Texas 78852 830-757-6870

#### Hospital

Fort Duncan Medical Center 3333 North Foster Maldonado Blvd Eagle Pass, Texas 78852 830-773-5321

#### Alternate Fire Department

Eagle Pass Fire Department (7 min away) 2420 2nd St Eagle Pass, Texas 78852 830-773-9690

#### **Alternate Police Department**

Maverick County Constable (7 min away) Eagle Pass Police Department (7 min away) 110 S Monroe St Eagle Pass, Texas 78852 830-773-9044

#### Alternate Hospital

Untied Medical Center 2525 North Veterans Blvd Eagle Pass, Texas 78852 830-773-5358

#### **Utility Service**

American Electric Power 1199 Eidson Rd. #1157 Eagle Pass, Texas 78852 877-373-4558



#### Lopeno

4676 South US Hwy 83 Zapata, Texas 78076 26.6876144552995,-99.10941781963609

#### Fire Department

Zapata County Fire Department (21 min away) 305 FM 496 Zapata, Texas 78076 956-765-9942

#### **Police Department**

Zapata County Police Dept (20 min away) 200 7<sup>th</sup> Ave Suite 415 Zapata, Texas 78076 956-765-9960

#### Hospital

Starr County Memorial (38 min) 128 FM 3167 Rio Grande City, Texas 78582 956-487-5561

#### **Alternate Fire Department**

City of Roma Volunteer Fire Dept (29 min away) 901 East Grant St Roma, Texas 78584 956-849-1770

#### **Alternate Police Department**

City of Roma Police Department (24 min away) 987 East Grant St Roma, Texas 78584 956-849-2231

#### Alternate Hospital

DHR Health (1 hr. 41 min) 5501 South McColl Rd Edinburg, Texas 78539 956-362-8677

#### **Utility Service**

South Texas Electric 2849 FM 447 Victoria, Texas 77901 361-575-6491



#### North Folk

51 PRV 905 Liberty Hill, Texas 78642 30.74895530455166,-97.87570768275121

#### Fire Department

Liberty Hill Fire Department 301 Loop 332 Liberty Hill, Texas 78642 512-515-5165

#### **Police Department**

Liberty Hill Police Department 1120 Loop 332 Liberty Hill, Texas 78642 512-515-5409

#### Hospital

St. David's Georgetown Hospital 2000 Scenic Dr Georgetown, Texas 78626 512-943-3000

#### Alternate Fire Department

Liberty Hill Fire Department 2 22799 Ronald W Reagan Blvd Liberty Hill, Texas 78642 512-515-5165

#### Alternate Police Department

Leander Police Department 705 Leander Dr Leander, Texas 78641 512-528-2800

#### Alternate Hospital

Baylor Scott & White 810 West Marble Falls, Texas 78654 830-201-8000

#### **Utility Service**

Pedernales Electric Cooperative 10625 W W State Hwy 29 Liberty Hill, Texas 78642 512-778-5470



#### **Bat Cave**

2051 Post Hill Street Mason, Texas 76856 30.73774525099855,-99.23177801618077

#### Fire Department

Mason Fire Department Mason, Texas 76856 325-347-6363

#### **Police Department**

Mason County Jail 122 Westmoreland St Mason, Texas 76856 325-347-5556

#### Hospital

Llano Memorial Healthcare 200 West Ollie St Llano, Texas 78643 325-247-5040

#### **Alternate Fire Department**

San Angelo Fire Department 306 W 1 st ST San Angelo, Texas 76903 325-657-4283

#### **Alternate Police Department**

7000 Culebra Rd 7000 Culebra Rd San Antonio, Texas 78237 210-207-7273

#### Alternate Hospital

Heart of Texas Healthcare System 2008 Nine Rd Brady, Texas 76825 325-597-2901

#### **Utility Service**

Lower Colorado River Authority 1338 Wirtz Dam Rd Marble Falls, Texas 78657 830-693-6082



# **ATTACHMENT K**



# Hurricane Response Plan BRP IntermediateCo I LLC

Power Generation Company (PGC)

Version 1.0 Effective Date: August 31, 2023

# BROAD REACH POWER

In the event of a hurricane, the first priority is always the health and safety of BRP IntermediateCo I LLC (BR Intermediate) personnel. BR Intermediate's hurricane response process is listed below:

- Ensure all BR Intermediate personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, BR Intermediate personnel must evacuate at a time recommended by local authorities.
- BR Intermediate facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
  - Ensure all loose material or equipment is secured.
  - o Ensure proper draining channels exist and are functional

BR Intermediate facilities in <u>Region 1</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

BR Intermediate facilities in <u>Region 2</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

BR Intermediate facilities in <u>Region 3</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

BR Intermediate facilities in <u>Region 4</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

BR Intermediate facilities in <u>Region 5</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

BR Intermediate facilities in <u>Region 6</u>, as specified by TDEM, shall use the hurricane <u>evacuation</u> <u>routes</u> published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

BR Intermediate shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

When re-entry to the affected facility is safe, it is important to ensure all emergency gear and equipment that may be necessary to clear paths are available, serviceable, and on hand to be used, if necessary. This equipment may include, depending on the circumstances, saws, tire chains, etc.

# BROAD REACH POWER

In the event that the entry route is obstructed or compromised, ensure proper PPE is worn and utilized and normal safety measures are employed.

Always ensure communication is maintained between BR Intermediate personnel attempting re-entry and BR Intermediate leadership.

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)	
Stacey Greene	HSE Manager	Maintain	
Peter Coladarci	Manager of Real-time Operations	Implement	
Stacey Greene	HSE Manager	Revise	

Version	Approval Date	Effective Date	Revision Summary
1.0	04/15/2022	04/18/2022	Initial Hurricane Plan