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Filing Date - 2023-09-15 03:39:41 PM

Control Number - 53385

Item Number - 1591



September 15, 2023

Filing Clerk, Central Records Division
Public Utility Commission of Texas
1701 N. Congress Avenue, 8-100
Austin, TX 78711-3326

Submitted via Email, CentralRecords@puc.texas.gov

Submitted via PUCT Interchange Filer

Dear Filing Clerk:

Re: Emergency Operations Plan (EOP)

Pursuant to Public Utility Commission of Texas (PUCT) Substantive Rules Chapter 25, Subchapter C: Infrastructure and Reliability, Section 25.53, Electric Service Emergency Operations Plans attached please find the above-referenced joint EOP for Texas Retail Energy Providers (REPs):

1. BP Energy Company, Texas License # EL020004, ID Number: 10038
2. BP Energy Retail, Texas License # RE210009, ID Number: 10294

Please don't hesitate to call me if you have any questions.

Sincerely,

Judy Briscoe
Regulatory Affairs Advisor
judy.briscoe@bp.com



Emergency Operations Plan (EOP)

As required by

Texas Public Utilities Commission (PUCT) Chapter 25, Subchapter C, Section 25.53

For

BP Energy Company (BPEC)

BP Energy Holding Company LLC (BPEHC)

Version 2.0

As of September 2023

Table of Contents

- I. Executive Summary
 - a. Contents and Policies
 - b. Reference to Specific Sections that Correspond to the Requirements
 - c. Affidavit
- II. Approval and Implementation
 - a. Record of Distribution
 - b. Emergency Contacts
 - c. Revision Control Summary
- III. Communication Plan
- IV. Maintaining Supplies
- V. Staffing During Emergency Response
- VI. Identification of weather-related hazards
- VII. Training/Drills
- VIII. Annexes
 - a. Pandemic and Epidemic Plan
 - b. Hurricane Plan
 - c. Cyber Security Plan
 - d. Physical Security Plan

I. EXECUTIVE SUMMARY

BP Energy Company ("BPEC") and BP Energy Holding Company LLC ("BPEHC") are wholly owned subsidiaries of BP Company North America Inc. ("BP") and licensed in the State of Texas as Retail Energy Providers (REPs).

BP is filing a single, joint EOP for both BPEC and BPEHC, as the staffing, procedures and policies are identical for each REP.

Additionally, BPEHC is an affiliate of BPEC, which has a full staff supporting Power. The same staff, procedures and controls are leveraged for BPEHC activity within Texas.

At this time, BPEC and BPEHC are licensed as Option 1 REPs. However, both function as Option 2 REPs, as they have no unaffiliated third-party retail customers. That is, at this time the only retail customers both entities serve are BP-affiliate commercial load. Additionally, BPEC and BPEHC do not own any transmission, distribution or generation facilities.

The purpose of this Emergency Operations Plan ("Plan") is to ensure a stable, reliable, and robust operating environment protected from operational disruptions caused by natural or manmade Hazards and/or Threats and related Emergencies.

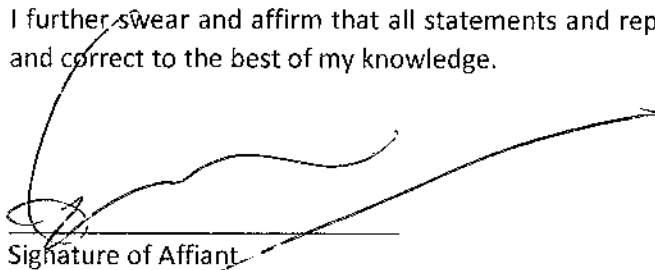
Item		
Description of Contents and Policies	C.1.A.i.I	Page 3
Reference to specific sections in 25.53	C.1.A.i.II	Page 4
Record of Distribution	C.1.A.i.III	Page 6
Affidavit	C.1.A.i.IV	Page 5
Emergency Contacts	C.4.B.i.IV	Page 6
Approval and Implementation Section	D.1.	Page 6
Revision Control and History	D.1.	Page 7
Communication Plan	D.2.C.	Page 7
Maintaining Supplies	D.3.	Page 8
Staffing During Emergency Response	D.4.	Page 8
Identification of Weather Related Hazards	D.5.	Page 8
Training and Drills	F.	Page 8-9
Pandemic and Epidemic Annex	E.3.A.	Page 10
Hurricane Annex	E.3.B.	Page 11
Cyber Security Annex	E.3.C.	Page 12
Physical Security Annex	E.3.D.	Page 13

State of Texas §

County of Harris §

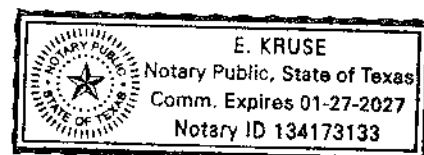
Before me, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, states as follows on behalf of BP Energy Company ["BPEC"] and BP Energy Holding Company LLC ["BPEHC"]:

1. My name Sri Rangan. I am the Vice President of Gas & Power Operations for BP Gas & Power Trading Americas.
2. 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 because of specific circumstances during the course of an emergency.
3. The EOP has been reviewed and approved by the appropriate executives.
4. Drills that test this EOP have been, or will be, conducted to the extent required by Commission rules.
5. The EOP or an appropriate summary shall be distributed to local jurisdictions, as needed.
6. Both BPEC and BPEHC maintain a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
7. Both BPEC and BPEHC have emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received, or will receive, the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
8. I further swear and affirm that all statements and representations made in this report are true and correct to the best of my knowledge.


Signature of Affiant

Sworn and subscribed before me this 14 day of 23 Sept.



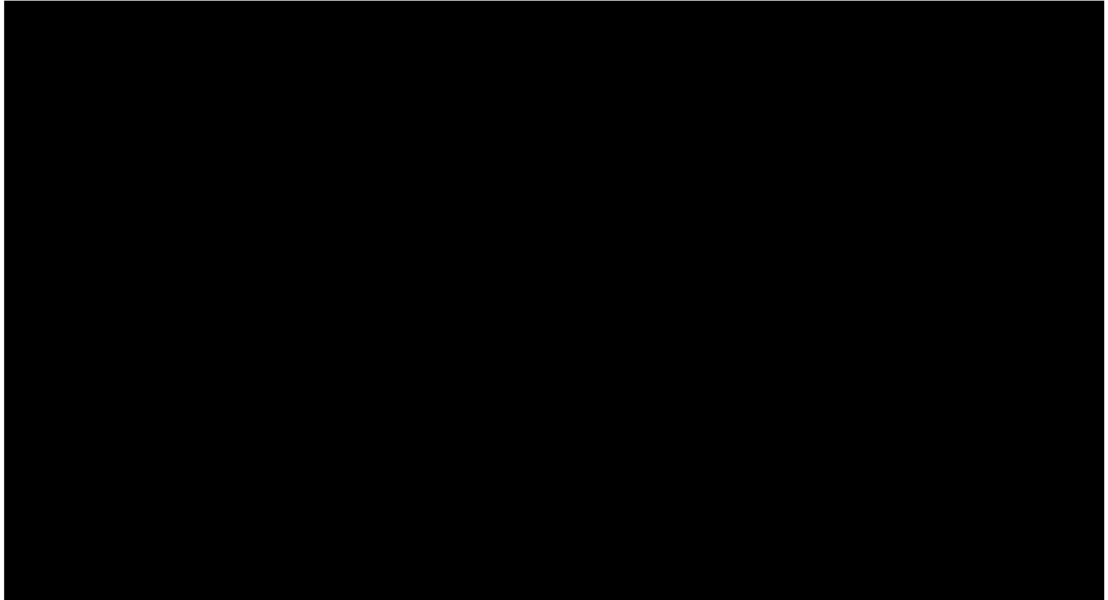


II. APPROVAL AND IMPLEMENTATION

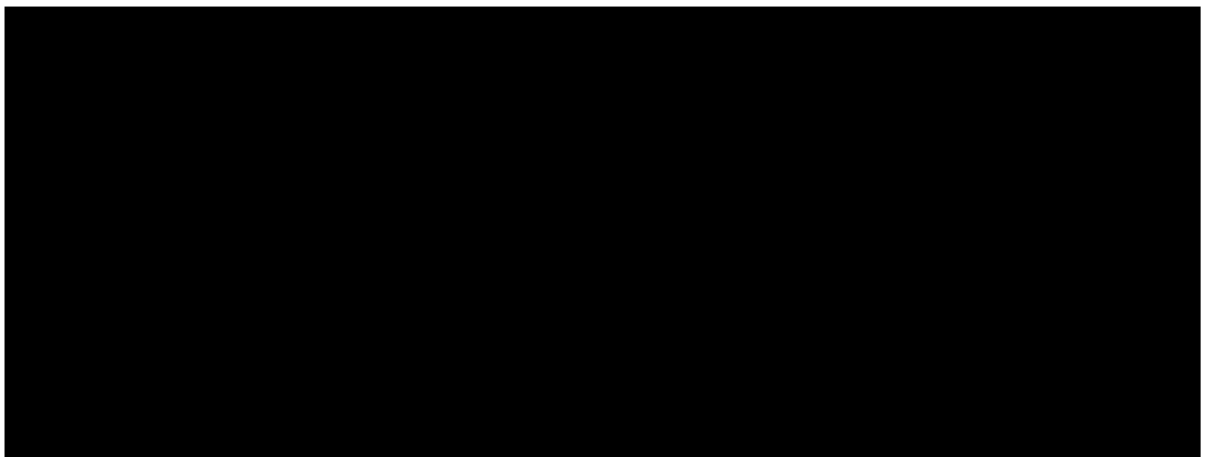
1) Distribution & Responsible Personnel

The following individual(s) have the following responsibilities in maintaining and implementing the EOP for both BPEC and BPEHC, as well as amending the EOP:

The following is the Record of Distribution (i.e., persons receiving access to and/or training on the EOP):



The following is a list of emergency contacts:



2) EOP Version and Control and History

EOP version 2.0 revision approved September 2023.

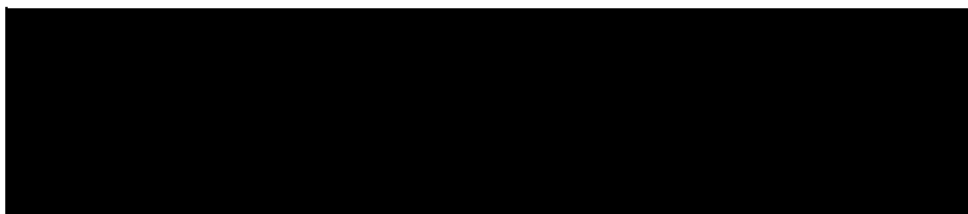
Updated BP Energy Retail LLC (BPER) to BP Energy Holding Company LLC (BPEHC)

Updated VII. Training/Drills section

EOP version 1.0 was approved April 2022.

Future modifications to the EOP will be documented in this section.

The following is a list of individuals responsible for maintaining and implementing the EOP. Any of these individuals may revise the EOP.



III. COMMUNICATION PLAN

BPEC and BPEHC will handle potentially affected stakeholders and its own operations in the event of an emergency as follows below. BPEC and BPEHC may modify its approach depending on the specific facts, circumstances, and needs of the situation with the most updated information available and accessible.

Public – BPEC and BPEHC will accommodate public communications through its digital/social presence and telecommunication capabilities.

Media – The media can contact BPEC and/or BPEHC through its website, social media pages, and business phone number. These capabilities are all internet-based. All inquiries will be referred to BP's communications and external affairs team.

Customers – BPEC and BPEHC will handle customer communications through its digital/social presence, email, and telecommunication capabilities. These capabilities are all internet-based.

Commission/OPUC – The commission/OPUC can communicate with BPEC and/or BPEHC personnel through readily available email, internet-based video/conference calls, and phone numbers. These capabilities are all internet-based.

Complaint Handling –BPEC and/or BPEHC operates its customer care center through readily available email, internet-based video/conference calls, and phone numbers and can maintain all complaints handling via work-from-home, if required. Both BPEC and BPEHC customer information is managed via a cloud-based information platform that supports remote access, if required.

IV. EMERGENCY RESPONSE SUPPLIES

The facility provider for BPEC and BPEHC maintain a first aid equipment kit to assist in the event of a local medical emergency.

V. STAFFING DURING EMERGENCIES

BPEC currently maintains a disaster recovery location at a back-up location that is geographically-separate from the primary location and where all QSE activities can be maintained and monitored on a 24x7 basis. The back-up location is maintained to ensure functionality and redundancy. BPEC utilizes an internal Business Continuity Plan group (BCP) comprised of senior level staff who will initiate the mobilization of business personnel and activities when a situation arises that could render the primary location inoperable.

In the event it becomes necessary to move BPEC from the primary to the back-up location, a representative from BPEC will notify ERCOT. BPEC and BPEHC personnel will then be deployed to the back-up location where all ERCOT QSE and LSE responsibilities will be managed.

BPEC is required to submit its Back-Up Control Plan to ERCOT on an annual basis as required by *ERCOT Operating Guides Section 3.2.1 (2)*.

VI. IDENTIFICATION OF WEATHER-RELATED HAZARDS

BP's BCP plan provides basic business continuity (BC) guidance applicable to all Trading & Shipping (T&S) teams, supporting functions and related co-located teams. Notifications of an incident (including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, flooding, etc.) that could impact the business continuity may come from building, facility or local public emergency notification systems, line manager or business leadership, or from the automated BP Alert notification system.

VII. TRAINING/DRILLS

BPEC performed an annual test of the back-up location functionality by deploying critical BCP staff and running operations from the geographically separate BCP facility on April 18 - 20, 2023. All functions and responsibilities BPEC performs in the ERCOT market were successfully tested and verified during the course of the 3-day exercise.

24/7 BP Realtime personnel have been assigned to either a primary or secondary role when the staff is deployed to the back-up location. The primary roles are required to travel to the back-up location to perform all ERCOT duties and have participated in the testing during a yearly practice run. The secondary roles remain in the primary location as the transition team when the event has ended, and the primary personnel are returning from BCP back-up location. Secondary roles have also previously visited the back-up location for training.

In the event of a pandemic outbreak or health event in which personal contact needs to be restricted to reduce potential human-to-human transmission, and the health and wellbeing of personnel are impacted, BP may close the primary location and instruct personnel to work remotely from home. This event may also prohibit BPEC and BPEHC personnel from traveling and working from the BCP locations, in which case the following exceptional circumstance procedures will apply:

- BPEC will notify ERCOT Operations Desk via phone and email that all personnel will be working remotely from home until further notice.
- ERCOT will need to deactivate the OPX-Hotline temporarily, until BPEC personnel can return to work to the primary or BCP back-up locations.
- BPEC will continuously maintain the 24/7 Realtime phone line 713-323-6044, for all ERCOT communications.
- BPEC & BPEHC will continue to manage and perform all operational functions from remote locations.

The T&S BCP is reviewed annually by the Global Power Trading America's Crisis & Continuity Management and approved by the T&S Regional Health, Safety, Security, and Environmental management. The BPEC Back-Up Control Plan is reviewed annually by the Operations Manager and approved by the VP Gas & Power Operations.

ANNEX A: PANDEMIC AND EPIDEMIC PLAN

In the event of a pandemic outbreak or health event in which personal contact needs to be restricted in an effort to reduce potential human-to-human transmission, and the health and wellbeing of personnel are impacted, BPEC may close its primary location and instruct personnel to work remotely from home. This event may also prohibit BPEC personnel from traveling and working from the BCP back-up locations, in which case the following exceptional circumstance procedures will apply:

- BPEC will notify ERCOT Operations Desk via phone and email that all personnel will be working remotely from home until further notice.
- ERCOT will need to deactivate the OPX-Hotline temporarily, until BPEC personnel can return to work to the primary location or BCP back-up locations.
- BPEC will continuously maintain the 24/7 Realtime phone line 713-323-6044, for all ERCOT communications.

BPEC will continue to manage and perform all operational functions from remote locations. BPEHC is an affiliate of BPEC which has a full staff supporting Power. The same staff procedures and controls will be leveraged for BPEHC activity within Texas.

ANNEX B: HURRICANE PLAN

BP maintains detailed emergency procedures for all locations. These emergency procedures cover:

- Employee responsibilities

- Medical emergency procedures

- Fire procedures

- Occupational Injury and Illness Procedures

- Evacuation Maps

- Severe Weather and Power Outage Procedures, including tornado and hurricane procedures

- Hazardous Materials procedures

- Security incidents and bomb threat procedures

- Workplace violence procedures

- After-hour procedures

A copy of the current BP emergency procedures for its primary Texas location are available upon request.

ANNEX C: CYBERSECURITY PLAN

BP maintains a suite of detailed cybersecurity policies and procedures. The purpose is to protect BP people and assets from cyber threat and make BP a cyber resilient organization.

The base BP Policy, Manage IT Security ("the Policy"), defines the IT Security requirements for the protection of BP's digital systems. The Policy details BP's minimum IT security controls required. The Policy was prepared by the SVP Digital Security and issued with the authority of the EVP Innovation and Engineering. The policy is supported by further technical standards and additional guidance and is not to be considered an exhaustive list of security requirements.

More information on BP's cybersecurity policies are available upon request.

ANNEX D: PHYSICAL SECURITY INCIDENT PLAN

BP maintains detailed emergency procedures for all locations. These emergency procedures cover:

- Employee responsibilities

- Medical emergency procedures

- Fire procedures

- Occupational Injury and Illness Procedures

- Evacuation Maps

- Severe Weather and Power Outage Procedures, including tornado and hurricane procedures

- Hazardous Materials procedures

- Security incidents and bomb threat procedures

- Workplace violence procedures

- After-hour procedures

A copy of the current BP emergency procedures for its primary Texas location is available upon request.