

# **Filing Receipt**

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September 29, 2023

Central Records Filing Clerk Public Utility Commission of Texas 1701 N. Congress Austin, Texas 78711-3326

RE: Project No. 53385. Emergency Operations Plan Submission of Heritage Energy Holdings LLC

Dear Filing Clerk:

In accordance with Public Utility Commission of Texas Substantive Rule § 25.53, Heritage Energy Holdings, LLC hereby submits its emergency operations plan ("EOP") submission for the Lone Wolfe Phase One Solar Facility 1.05MWac (nameplate) in Mitchell County, Texas. This submission includes the following:

- an executive summary that (a) describes the contents and policies set forth in the EOP,
   (b) includes references to specific sections and page number of the EOP that correspond with the requirements of Rule § 25.53, (c) includes a record of distribution, and (d) includes an affidavit; and
- a complete copy of the EOP with confidential portions redacted.

If you have any questions, please do not hesitate to contact me at 325-660-7705.

Sincerely,

Tim Sanchez Chief Executive Officer

3900 N. 10th. Street, Suite 910 • McAllen, TX 78501 Ph. 325-660-7705 • www.heritageenergyholdings.com



#### Executive Summary

#### I. INTRODUCTION

Heritage Energy Holdings, LLC ("HEH") submits this Emergency Operations Plan ("EOP"), which presents the operational functions that are essential in responding to multiple types of emergencies and includes annexes that outline HEH's response to specific emergencies.

The HEH Emergency Operations Plan is designed to be a management tool to facilitate a timely, effective, efficient and coordinated emergency response to significant events. This EOP is submitted to the Public Utility Commission of Texas ("Commission") and to the Electric Reliability Council of Texas ("ERCOT") in compliance with the requirements of 16 Tex. Admin.Code ("TAC") § 25.53.

#### II. EMERGENCY MANAGEMENT

HEH's Emergency Management consists of four continuous stages:

#### Mitigation

HEH's EOP includes activities designed to reduce or eliminate risks to personnel, customers, and business operations or to lessen the actual or potential effects or consequences of an incident. HEH's mitigation measures may be implemented prior to, during or after an incident. HEH's mitigation involves ongoing actions to reduce exposure to, probability of, or potential loss from an emergency.

#### Preparedness

HEH's EOP involves preparedness at all levels to identify threats, determine vulnerabilities, educate and train our personnel and identify required resources. HEH's preparedness is operationally focused on establishing guidelines, plans, procedures, protocols, and standards for planning, training and drills, personnel qualification and certification and customer management.

#### Response

HEH's EOP response involves activities that address the short-term and direct effects of an incident. It includes immediate actions to protect and maintain personnel safety, customer communication and business operations. As indicated by our EOP, response activities include being proactive in identifying an emergency and ultimately having our personnel and operations properly trained to execute our EOP.

#### Recovery

HEH's EOP involves recovery from an incident. That recovery incorporates the development, coordination, and execution of restored normal business operating services. In addition, evaluating the incident to identify lessons learned; post incident reporting and modifying our EOP based on initiatives to mitigate the effects of future incidents.



# III. PRIMARY AND BACKUP EMERGENCY CONTACTS

#### Primary Contacts (Urgent Requests)

INAME	TIME	Rhone
Tim Sanchez	CEO	
Mike Tackett	President	

#### **Backup Contacts**

NAME	TITUTE	FIIONE
Dennis Anderson	Director of Operations	
Andy Miller	Operations Supervisor	

#### **IV. SUMMARY OF CONTENTS**

1. Sections and Page Numbers of EOP Corresponding to Requirements of Public Utility Commission of Texas Substantive Rule §25.53.

EOP Sections and or Page Numbers	PUCT Rule 25.53 Requirements
Page 6	Approval and Implementation Section
Appendix O	Communication Plan
Appendix Q	Plan to Maintain Pre-Identified Supplies
Appendix C, K and N	Plan Addressing Staffing
Appendix K	Plan Addressing Potential Weather Events
Appendix K	Weather Emergency Annex
Appendix M	Water Shortage Annex
Appendix J	Restoration of Service Annex
Appendix N	Pandemic and Epidemic Annex
Not Required	Hurricane Annex, if required
Appendix P	Cyber Security Annex
Appendix I	Physical Security Incident Annex



# V. RECORD OF DISTRIBUTION

RAME	TAIAUS	TRAINING DAME
Tim Sanchez	CEO	September 1, 2023
Mike Tackett	President	September 1, 2023
Charles Wolfe	CFO	September 1, 2023
Dennis Anderson	Director of Operations	September 1, 2023
Andy Miller	Operations Supervisor	September 1, 2023



#### AFFIDAVIT

STATE OF TEXAS § COUNTY OF HIDALGO §

Before me, the undersigned notary public, on this day personally appeared Tim Sanchez, to me known to be the person whose name is subscribed to the foregoing instrument, who being duly sworn according to law, deposes and says:

"1. My name is Tim Sanchez. I am over the age of eighteen and am a resident of the State of Texas. 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 Heritage Energy Holdings, LLC ("HEH").

2 I swear or affirm that in my capacity as Chief Executive Officer of Heritage Energy Holdings, LLC, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed into Project No. 53385.

2. I further swear or affirm that I have personal knowledge of the facts stated below:

 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 PUC Substantive Rule § 25.53 and limited by paragraph 4 below;

. The EOP has been distributed to location jurisdictions as needed;

 HEH's Emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training by December 23, 2023.

- 3. HEH intends to conduct a drill consistent with Subsection (f) of PUC Substantive Rule § 25.53 by December 23, 2023, and will provide notice to the Commission at least 30 prior to commencement.
- 4. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief."

Further affiant sayeth not.

Tim Sanchez

Chief Executive Officer Heritage Energy Holdings, LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME ON THE 29th DAY September, 2023. 01000

Notary Public in and for the State of Texas





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# 1. MAINTAINING & IMPLEMENTING EOP

The following individuals are responsible for maintaining and implementing the EOP, including interacting with local, state and federal emergency management officials. In addition, the listed have the authority to change the EOP.

Tim Sanchez - CEO ·	• (Ph.	)		
Mike Tackett - President ·	• (Ph.			
Andy Miller - Operations Supervisor ·		• (Ph.		
Dennis Anderson - Director of Operations •			• (Ph.	
				-

### 2. REVISON CONTROL SUMMARY

This is HEH's Original EOP Filing as required by 16 Tex. Admin. Code § 25.53 prior to commercial operations.

### 3. STATEMENT OF SUPERSESSION

Pursuant to 16 TAC § 25.53(d)(1)(D), HEH affirms as of September 1, 2023, that the current EOP supersedes all previous EOPs.

# 4. DATE OF APPROVAL

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

### 5. COMMUNICATION PLAN

- a. Communication with the Media: Responsible Party: Mike Tackett, President and Tim Sanchez, CEO
- b. Communication with the PUCT: Responsible Party: Mike Tackett, President and Tim Sanchez CEO are listed as primary and backup for PUCT to contact during an emergency.
- c. Communication with OPUC: Responsible Party: Mike Tackett, President and Tim Sanchez CEO will represent HEH in communications with OPUC in the event of an emergency.
- d. Communication with Fuel Suppliers: Responsible Party: Does not apply to this generation facility. Lone Wolfe Phase One is a PV generation facility with no fuel sources.



- e. Communication with Local and State Governmental Entities, Officials, and Emergency Operations Centers
  - Responsible Party: Mike Tackett, President and Tim Sanchez CEO will represent HEH in communications with local and state governmental entities, officials, and Emergency Operations Centers.
- f. Communication with ERCOT
  - Responsible Party: Mike Tackett, President and Tim Sanchez CEO are listed as backup AR and AR respectively for ERCOT to contact during an emergency. System Administrator, is the security administrator that provides ERCOT MIS system access for end users. Dennis Anderson, Director of Operations oversees operations and communicates with ERCOT as needed.

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

HEH is providing pre-identified emergency and inventory supplies required for an emergency response.

First Solar FS-6425A 425 WP Solar Panels - 10 Ching Power System SCH/25KTL - DO/US-60 Inverter - 1 Siemens Breaker 3VA62258HL310AA0, 250A, 3 Pole - 2 Assorted nuts, bolts, racking hardware DC Feeder Repair Kit Spare Harness, PV Connectors Crimpers, in-line fuses and PV AC & DC Wire MV Fuses First Aid Kit Potable Water

### 7. STAFFING PLAN DURING EMERGENCY

HEH is well positioned to handle potential unexpected emergencies. HEH does not expect additional staffing requirements prior to or during a severe weather event. HEH does have the capability and staff to mobilize additional field service technicians and contractors to supplement the site team as needed. HEH conducts pre-season planning of each summer and winter to ensure the proper weatherization has been completed. Annual review of the checklists is documented and stored in our cloud-based database.

# 8. IDENTIFICATION AND PROCESS FOR EOP ACTIVATION/WEATHER PLANNING

HEH monitors the National Weather Service, local news channels, and ERCOT Notifications on a daily basis to prepare for weather related events. The Lone Wolfe Phase One Solar facility is dependent on irradiance. If there is no irradiance, the plant will shut down energy production. During seasonal events such as heavy cloud cover or snow typically reduces energy output. Once a potential weather event is identified, the following steps are implemented:



- a. Leadership Meeting to identify potential weather threat. (Typically two weeks from event if advanced notice)
- b. Assess if it has the potential to disrupt business operations.
- c. If assessment produces a viable weather threat, our EOP is activated.
- d. Communicate with field service technicians to conduct safety checks on equipment and storage containers based on weather threat.
- e. Have necessary staff on standby for deployment after event if necessary.
- f. Continue to assess weather resources for updates.

#### 8.1 WEATHER CONDITIONS ACTIVATING THE EOP

- a. Extreme cold, Snow and Ice Storms: upon notification from the National Weather Service in San Angelo, Texas predicting temperatures below 35 degrees Fahrenheit or colder at the facility.
- b. Extreme heat: upon notification from the National Weather Service in San Angelo, Texas broadcasting excessive heat alerts at the facility.
- c. Wind Events, Tornadoes and Hurricanes: upon notification from the National Weather Service in San Angelo, Texas broadcasting excessive wind events, tornadoes or hurricanes. The tracker equipment will automatically move into a wind stow position, which would active the EOP.
- d. Flooding: upon notification from the National Weather Service in San Angelo, Texas broadcasting excessive rain alerts at the facility. The EOP will be activated if the Director of operations believes flooding may occur.

#### 9. RESTORATION RESPONSE TIME

The Lone Wolfe Phase One Operations and Maintenance team monitors the generation output and plant operations 7-days a week, 24-hours a day, and receives both phone texts and email alerts for any event that disrupts the power generation or causes voltage swings outside of the acceptable ranges. In multiple weather situations, it is conceivable that Lone Wolfe Phase One will experience a power outage. Once the alert is received, our maintenance team will perform a site assessment and reset reclosers and any other breakers necessary to restart generation output. The estimated response time is one (1) hour.

#### 10. EMERGENCY OPERATIONS PLAN DRILL

The HEH plan is tested at least every 12 months to confirm the contents and procedures in this plan. The drill is accomplished by either responding to an actual event in the preceding 12 months or conducting a planned exercise/drill.

EOP drills must follow this plan. The HEH Director of Operations will ensure that a drill of this plan occurs annually. Once the drill is completed, the Director of Operations will provide a completion notice to the CEO.



#### **10.1 PUCT Drill Requirements**

a. HEH must conduct or participate in at least one drill each calendar year to test this EOP.

b. Following the drill, HEH must assess its effectiveness and revise its EOP as needed.

c. If HEH operates in a hurricane or evacuation zone as defined by TDEM, at least one of its annual drills must include a test of its hurricane annex.

d. HEH must notify the PUCT Commission Staff at least 30 days prior to conducting an annual drill using the method and form prescribed by the PUCT 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.

e. If HEH has activated it's EOP in response to an emergency, it is not required to conduct or participate in a drill in the calendar year in which the EOP was activate.

f. The Director of Operations will determine the content of each drill with the input of management as needed.

g. The annual drill must include a documented evacuation of the facility.

h. The date the drill was conducted and individuals participating must be documented and filed.

i. If the annual drill requirement is fulfilled by an actual event, all materials must be preserved, individuals documented and provided to the Director of Operations. Materials collected should include but not be limited to: operating logs, work orders, voice mails, and emails.

j. Once the annual drill or event is completed, this EOP plan will be assessed and updated as needed based on the feedback received and provided to the Director of Operations.

### 11. ANNUAL TRAINING AND REVIEW

HEH personnel, including contractors, shall receive training on this Emergency Operations Plan on an annual basis. HEH personnel, including contractors, will be trained when this plan is initially implemented. Contractors and any visitors who enter the operating areas of the facility will be training on plant alarms and evacuation procedures before they enter the facility for the first time.

### 12. EMERGENCY CONTACT INFORMATION

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

#### 13. REQUIRED ANNUAL REPORTING

- a. ERCOT and the PUCT require HEH file any updated version of its EOP by March 15, annually.
- b. ERCOT Nodal Protocols 3.21(1) require HEH, as a Resource Entity, to provide ERCOT with a complete copy of the Emergency Operations Plan, unredacted, for each Generation Resource under the Resource Entity's control. Each Resource Entity shall



provide ERCOT with any updated versions of the 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 and October 31. Resource Entities shall submit all plans and updates electronically.

c. HEH maintains separate plans for summer and winter weatherization. HEH, as a Resource Entity, is required to provide ERCOT with any updated versions of the weatherization 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 and October 31. Resource Entities shall submit all plans and updates electronically.



# APPENDIX A – SITE MAP WITH DESIGNATED ASSEMBLY/MUSTER POINTS



#### **APPENDIX B – SITE SPECIFIC EMERGENCY CONTACT INFORMATION**

Primary Coordinator	Director of Operations	Dennis Anderson:	
Alternate Coordinator	CEO	Tim Sanchez:	
Alternate Coordinator	President	Mike Tackett:	
Alternate Coordinator	Operations Supervisor	Andy Miller:	

#### HEH EMERGENCY CONTACT INFORMATION

# **APPENDIX C – GENERAL EMERGENCY RESPONSE**

#### Lone Wolfe Phase One Solar: Block 25 Section 58 A 712 PME, Loraine, TX 79532.

Once a site emergency has been declared, all personnel shall take the following actions:

STEP	ACTION
1	Safely stop work and secure work area if possible.
2	Notify Director of Operations to provide enough information to assist in
	incident/emergency evaluation and appropriate response.
3	As directed by the Director of Operations, provide rescue assistance or support.
4	As appropriate call 911 or another designated Emergency Service provider based on
	emergency evaluation. Refer to the Site Emergency Contact Information sheet for
	proper contact to insure prompt response.
5	If off-site Emergency Response personnel are required, the Director of Operations
	shall coordinate with site personnel to insure access to the site and proper directions
	to location.
6	If instructed, report to the designated assembly/muster point unless the route to the
	muster area is not safe for travel. In such case, proceed to an alternate muster point.
7	Remain calm, alert, and wait for further instructions.
8	Listen carefully for your name to be called for accountability. If your name is not called,
	report to the Person in Charge immediately.
9	Listen for the names of unaccounted workers. If possible, provide information
	regarding their last known location.
10	Remain in the assembly area until dismissed. Do not get into a car, leave the site, or
	wander out of your assembly/muster area unless given an Evacuation Order or an All
	Clear/return to work authorization has been given by site management.



# **APPENDIX D – INJURY RESPONSE**

STEP	ACTION
1	Check the area and the injured party to determine the potential danger and the extent
	of the injury. Do not move a seriously injured victim unless there is an immediate
	danger.
2	Notify the Director of Operations of the injury, if appropriate call 911 or another
	designated Emergency Provider. Refer to the Site Emergency Contact Information
	Sheet for proper contact to insure prompt response.
3	If the injury is minor, treat with first aid kit.
4	If injury requires additional evaluation, refer to the Site Emergency Contact Information
	Sheet for proper contact to insure prompt response.
5	If the injury is determined to need additional medical attention, the site manager will
	make the appropriate notifications to the designated Emergency Provider.
6	If off site Emergency Response personnel are required, the Director of Operations will
	coordinate with site personnel to insure access to the site and proper directions to the
	location.
7	Notify Management of the incident.



# APPENDIX E – CHEMICAL SPILL OR RELEASE

The intent of this Appendix is to provide information to address and mitigate the consequences of a spill or release that is immediately affecting personnel or environmental safety.

Under normal activities at the site, there should be no materials in use that represent an acutely hazardous or toxic chemical exposure. Any activities that may involve such substances will require a response plan for the specific substances to be developed before their use on site is allowed.

STEP	ACTION
1	Notify the Director of Operations of the spill or release. Provide as much of the following information as possible:
	• Location
	<ul> <li>Substance spilled or released</li> <li>Volume(approximate)</li> </ul>
	Extent of the spill or release
	Threat to personnel, equipment or environment
	Immediate assistance required
2	The Director of Operations will notify Management to assist with spill evaluation as needed.
3	If appropriate call 911 or another designated Emergency Provider. Refer to the Site
	Emergency Contact Information Sheet for proper contact to insure prompt response.
4	If off site Emergency Response personnel are required, the Director of Operations will coordinate with site personnel to insure access to the site and proper directions to the location.



## APPENDIX F – HAZARDOUS MATERIALS SPILL OR RELEASE RESPONSE

A hazardous material is a substance that presents a physical or health hazard. A health hazard refers to a substance for which there is evidence that health effects may occur for exposed employees or contractors.

A Safety Data Sheet is required for all hazardous substances in use at the site. Site personnel will be provided with training on the safe use of all chemicals they will be exposed to.

The list of chemicals, regularly used at the site is located in the storage room.

STEP	ACTION
1	Assess the situation and direct all on site personnel of immediate actions required to minimize exposure to personal injury and to stabilize the situation.
2	Immediately notify the Director of Operations. Provide as much information as possible:
	<ul> <li>Location</li> <li>Substance Spilled</li> <li>Volume(approximate)</li> <li>Extent of Spill</li> </ul>
	<ul> <li>Assistance Required</li> <li>Status of spill</li> <li>Threat to watercourse</li> <li>Threat to Public</li> </ul>
3	If appropriate call 911 or another designated Emergency Provider. Refer to the Site Emergency Contact Information Sheet for proper contact to insure prompt response.
4	If off site Emergency Response personnel are required, the Director of Operations will coordinate with site personnel to insure access to the site and proper directions to the location.
5	If necessary, the Director of Operations will account for personnel by having them assemble at the assembly/muster point except for any personnel required to respond to the incident.
6	If necessary, the Director of Operations will order a site evacuation and will designate site personnel to coordinate the evacuation.
7	If it is determined that emergency services are needed, the Director of Operations will make the call and will coordinate to escort the arriving emergency vehicles.
8	Notify management of the incident.



# **APPENDIX G – FIRE RESPONSE**

STEP	ACTION
1	Notify Director of Operations of file. Provide your location, such as solar panel
	number, row or site landmarks.
2	Provide status of victims, if any, and the affected areas of the fire. Move any victims
	to a safe area if possible.
3	Alert others nearby to clear the affected area.
4	If appropriate call 911 or another designated Emergency Provider. Refer to the Site
	Emergency Contact Information Sheet for proper contact to insure prompt
	response.
5	If off site Emergency Response personnel are required, the Director of Operations
	will coordinate with site personnel to insure access to the site and proper directions
	to the location.
6	Try to extinguish the fire ONLY if safe to do so and trained to use a fire extinguisher
	or other fire fighting equipment or feel comfortable with extinguishing the fire.
7	All site personnel should maintain radio silence if not directly involved in the
	emergency to ensure the ability of response personnel to communicate.
8	Upon hearing instructions from the Director of Operations, proceed to the nearest
	assembly/muster point area an wait for further instructions.
9	Stay together and do not leave until ALL CLEAR is given or further instruction is
	provided by the Director of Operations.



# **APPENDIX H – BOMB OR TERRORISM THREAT RESPONSE**

STEP	ACTION	
1	If you receive a bomb or terrorism threat or discover a possible bomb or suspicious	
	object(s) consider the threat real and immediately notify the Director of Operations.	
2	Utilize a Bomb/Terrorism Threat Checklist such as the one below to obtain as much	
	information as possible regarding the threat. www.tripwire.dhs.gov	

SEE BOMB THREAT CHECKLIST ON FOLLOWING PAGE:



#### BOMB THREAT PROCEDURES

This quick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with the first responders and other stakeholders.

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the reverse of this card.

If a bomb threat is received by phone:

- 1. Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
- 2. Listen carefully. Be polite and show interest.
- 3. Try to keep the caller talking to learn more information.
- 4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
- 5. If your phone has a display, copy the number and/or letters on the window display. 6. Complete the Bomb Threat Checklist immediately. Write down as much
- detail as you can remember. Try to get exact words.
- 7. Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities immediately with information and await instructions.
- If a bomb threat is received by handwritten note:
- Call
- · Handle note as minimally as possible.
- If a bomb threat is received by e-mail:
- · Call

Stains

Strange odor

· Do not delete the message.

Signs of a suspicious package:

- No return address · Poorly handwritten
- Excessive postage
  - - Incorrect titles

Misspelled words

- Foreign postage
- Strange sounds Restrictive notes
- Unexpected delivery
- \* Refer to your local bomb threat emergency response plan for evacuation criteria

#### DO NOT:

- · Use two-way radios or cellular phone. Radio signals have the potential to detonate a bomb.
- Touch or move a suspicious package.

#### WHO TO CONTACT (Select One)

- 911
- Follow your local guidelines

For more information about this form contact the Office for Bombing Prevention at: OBP@cisa.dhs.gov



#### **BOMB THREAT CHECKLIST**

DATE:

TIME CALLER HUNG UP:

PHONE NUMBER WHERE CALL RECEIVED:

#### Ask Caller:

TIME:

- Where is the bomb located?
- (building, floor, room, etc.)
- · When will it go off?
- · What does it look like?
- · What kind of bomb is it?
- What will make it explode?
- · Did you place the bomb? Yes No
- · Why?
- What is your name?

#### **Exact Words of Threat:**

#### Information About Caller:

- · Where is the caller located? (background/level of noise)
- Estimated age:
- Is voice familiar? If so, who does it sound like?
- · Other points:

Caller's Voice	Background Sounds	Threat Language	_
Female	Animal noises	C Incoherent	
🗆 Male	House noises	Message read	
Accent	Kitchen noises	C Taped message	
Angry	Street noises	C Imational	
Calm	Booth	Profane	
Clearing throat	PA system	Weil-spoken	
Coughing	Conversation		
Cracking Voice	Music		
Crying	Motor		
Deep	Clear		
Deep breathing	Static		
Disguised	Office machinery		
Distinct	Factory machinery		
Excited	Local		
Laughter	Long distance		
CI Lisp			
C Loud	Other Information:		
I Nasal	orna anomatori.		
Normal			
C Ragged	-		_
Rapid			
C Raspy			
C Slow			
C Slurred			
C Soft			

Ϋ2

C Stutter



#### **APPENDIX I – SABOTAGE AND PHYSICAL SECURITY INCIDENT**

Sabotage of the site may take different forms and it would be impossible to define any and all sabotage scenarios that could occur. Sabotage can be either cyber or physical. All suspected cyber security event shall follow the procedures outlined below:

STEP	ACTION
1	If sabotage has been identified or reported, immediately notify the Director of
	Operations.
2	The Director of Operations will determine when and if it is safe for personnel to
	continue work and make appropriate notifications to site personnel based on initial information and site conditions.
3	If appropriate call 911 or another designated Emergency Provider. Refer to the Site
	Emergency Contact Information Sheet for proper contact to insure prompt response.
4	If off site Emergency Response personnel are required, the Director of Operations
	will coordinate with site personnel to insure access to the site and proper directions
	to the location.
5	The Director of Operations shall notify appropriate law enforcement as necessary to
	investigate.
6	If sabotage resulted in creating and unacceptable safety risk, the affected equipment
	shall be shut down or affected area cleared and barricaded.
7	The Director of Operations shall notify management.
8	The Director of Operations shall consider whether the event is reportable in
	accordance with NERC Reliability Standard EOP-004.



# APPENDIX J – ELECTRICAL SYSTEM EMERGENCIES & RESTORATION OF SERVICE

Electrical system emergencies at the site and connected distribution and transmission systems may take many different forms and it would be impossible to define all system emergencies that could occur.

The Director of Operations shall take all appropriate actions to evaluate system conditions, maintain or re-establish normal operations.

STEP	ACTION - SYSTEM EMERGENCIES
1	Upon recognition of a system emergency, the Director of Operations shall evaluate the emergency for safety risks and take immediate actions to protect personnel, plant equipment and property.
2	If appropriate call 911 or another designated Emergency Provider. Refer to the Site Emergency Contact Information Sheet for proper contact to insure prompt response.
3	If off site Emergency Response personnel are required, the Director of Operations will coordinate with site personnel to insure access to the site and proper directions to the location.
4	Director of Operations shall contact the appropriate Operations or System Service Center to provide system emergency information and determine if any action is needed.
5	The Director of Operations will work with management to determine if any reporting requirements are necessary.
6	The Director of Operations will notify management.

STEP	ACTION – RESTORATION OF SERVICE
1	After the System Emergency has cleared, it is safe to return to the site and return to
	normal operations.
2	Contact ONCOR to coordinate the site's return to service. Have ONCOR provide
	any information for any abnormal condition that may still exist that may prevent the
	site returning to normal operations.
3	After approval is received from ONCOR, the site may proceed to returning to normal
	operations.
4	Make sure to note and document any abnormal conditions found upon return to site.



# APPENDIX K – NATURAL DISASTERS/SEVERE WEATHER

STEP	ADVERSE WEATHER PREPARATIONS
1	Identification of weather-related hazards: Site will make sure of the onsite weather
	station and the National Weather Service stationed in San Angelo, Texas, to provide
	alerts on adverse and severe weather that will affect the site.
2	Cold weather: The Director of Operations will take appropriate precautionary actions such
	as:
	Prepare for the coming weather conditions. Take into considerations the
	recommendations provided by the National Weather Service.
	Pick up and secure loose materials and equipment on site in anticipation of high winds. Based on type and severity of severe weather, the Director of Operations will notify site
	personnel of any potential actions required to be taken such as the need to shelter or site
	evacuation.
	If site evacuation instructions are given, workers shall remain off-site until notified by the
	Director of Operations that it is safe to return.
	Ensure site vehicles are in good running condition
	Ensure communications (phones and radios) are operating properly.
	Ensure communications (phones and radios) are operating propeny.
	In anticipation of severe cold, refer to Wind Chill charts and adjust outside work activity to
	limit worker exposure.
	Make sure adequate inventory is available to support normal cold weather repairs.
	Make sure site personnel have adequate cold weather PPE.
	Ensure ERCOT has not issued any system alerts that would affect normal site activities.
	For freeze conditions which would cause icing on solar panels, please use extreme caution.
	Make sure adequate ice melt is available.
	Tire chains are available for trucks (as necessary).
	Ensure Site teams are performing ice assessments of solar panels.
	Ensure ERCOT has not issued any system alerts that would affect normal site activities.
	Hot weather: The Director of Operations will take appropriate precautionary actions such
3	as:
	Prepare for the coming weather conditions. Take into considerations the
	recommendations provided by the National Weather Service.
	Based on type and severity of severe weather the Director of Operations will notify
	site personnel of any potential actions required to be taken such as the need to
	shelter or site evacuation.
	<ul> <li>If site evacuation instructions are given, workers shall remain off-site until notified by the Director of Operations that it is safe to return.</li> </ul>
	<ul> <li>Ensure site vehicles are in good running condition.</li> </ul>



•	Ensure communications (phones and radios) are operating properly.
	Make sure adequate water and ice is available Make sure adequate inventory is available to support normal hot weather repairs Ensure ERCOT has not issued any system alerts that would affect normal site activities

STEP	NATURAL DISASTER (TORNADO, HURRICANE, FLOODING)
1	Director of Operations shall conduct an evaluation of the emergency to determine
	appropriate actions required to be taken.
2	The Director of Operation's priority is to ensure the safety of site workers. This can include
	instructions to shelter or evacuate the site.
3	If site evacuation instructions are given, workers shall remain off-site until notified by the
	Director of Operations that it is safe to return. Notify management of the evacuation.
4	Inspect the affected areas of the site to identify any damages. Report plant status and
	equipment damaged to Management and ONCOR.
5	If appropriate call 911 or another designated Emergency Provider. Refer to the Site
	Emergency Contact Information Sheet for proper contact to insure prompt response.
6	If off site Emergency Response personnel are required, the Director of Operations will
	coordinate with site personnel to insure access to the site and proper directions to the
	location.

STEP	EARTHQUAKE ACTIONS
1	If inside a building remain calm and don't rush outside. Protect your head and face. Stand
	in a doorway; take cover under a sturdy table, desk or move to an inner hallway. Stay
	away from tall fixtures and windows.
2	If outside stay away from fallen or downed electrical wires. Move away from high
	structures.
3	Once the ground has stopped shaking perform an accountability check to ensure all
	personnel are accounted for and there are no injuries.
4	Inspect the affected areas of the site to identify any damages. Report plant status and
	equipment damaged to management and ONCOR.
5	If appropriate call 911 or another designated Emergency Provider. Refer to the Site
	Emergency Contact Information Sheet for proper contact to insure prompt response.
6	If off site Emergency Response personnel are required, the Director of Operations will
	coordinate with site personnel to insure access to the site and proper directions to the
	location.



STEP	LIGHTNING ACTIONS
1	Plant will monitor for lightning. In the event of lightning or thunderstorms in the area the site will implement the following as appropriate: 50-mile band - Serves as a warning threshold to incoming/nearby storm systems. Work may continue as weather conditions are monitored. 30-mile band - Serves as first action threshold. Once the 30-mile band is breached workers should begin to secure all tools and equipment and leave the field. Director of Operations may authorize some field work after evaluation of weather conditions (storm severity and movement) and appropriate risk assessment. 10-mile band - Serves as final action threshold. All work is to immediately cease, and personnel shall seek shelter.
2	After the lightning event is over, conduct an assessment to determine that all personnel are accounted for and are injury free and that there is no other plant or equipment issues that require additional attention.
3	If appropriate call 911 or another designated Emergency Provider. Refer to the Site Emergency Contact Information Sheet for proper contact to insure prompt response.
4	If off site Emergency Response personnel are required, the Director of Operations will coordinate with site personnel to insure access to the site and proper directions to the location.



# APPENDIX L – ACTIVE SHOOTER/TRESPASSING

STEP	ACTIVE SHOOTER ACTIONS
1	Active Shooter incidents are often over in 10 - 15 minutes, before law enforcement arrives. Site personnel must be prepared to respond mentally and physically to an active shooter situation. Typically, law enforcement is displaced for final resolution of the event. Personnel must be able to assist responding law enforcement without endangering themselves. Contractors should remain in a safe or hidden location until they have been notified it is safe to assembly at a muster point to be determined at that time.

# HOW TO RESPOND WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

QUICKLY DETERMINE THE MOST REASONABLE WAY TO PROTECT YOUR OWN LIFE. CUSTOMERS AND CLIENTS ARE LIKELY TO FOLLOW THE LEAD OF EMPLOYEES AND MANAGERS DURING AN ACTIVE SHOOTER SITUATION.

1. EVACUATE

- 2. HIDE OUT
- Have an escape route and plan in mind

· Leave your belongings behind

· Keep your hands visible

- Hide in an area out of the active shooter's view.
  - Block entry to your hiding place and lock the doors

#### CALL 911 WHEN IT IS SAFE TO DO SO

- 3. TAKE ACTION
  - As a last resort and only when your life is in imminent danger.
  - Attempt to incapacitate the active shooter
  - Act with physical aggression and throw items at the active shooter

#### HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES ON THE SCENE

#### 1. HOW YOU SHOULD REACT WHEN LAW ENFORCEMENT ARRIVES:

- · Remain calm, and follow officers' instructions
- · Immediately raise hands and spread fingers
- · Keep hands visible at all times
- Avoid making quick movements toward officers such as attempting to hold on to them for safety
- 2. INFORMATION YOU SHOULD PROVIDE TO LAW ENFORCEMENT OR 911 OPERATOR:
  - · Location of the active shooter
  - · Number of shooters, if more than one
  - · Physical description of shooter/s

- Avoid pointing, screaming and/or yelling
- Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises
- PROVIDE TO LAW ENFORCEMENT OR 911 OPERATO
  - Number and type of weapons held by the shooter/s
  - · Number of potential victims at the location



# **APPENDIX M – WATER SHORTAGE**

STEP	WATER SHORTAGE	
	Not applicable. Water is not needed to generate electricity at this solar site.	



# **APPENDIX N – PANDEMIC AND EPIDEMIC RESPONSE**

A plant pandemic event is an epidemic or outbreak of infectious disease during which a substantial number or all the facility O&M personnel may not be available to maintain continued site presence to support plant operations. As a result, Operations Management may, depending upon the situation, utilize any one or combinations of the following options below to attempt to ensure continuous and adequate service of the facility.

STEP	PANDEMIC RESPONSE ACTIONS	
1	Facility management will utilize remote computer access via SCADA systems to operate and monitor site conditions.	
2	Use of the Also Energy to monitor solar panels and inverters (as applicable).	
3	Use HEH personnel from other sites as needed.	
4	Use of third-party O&M Service providers.	
5	If appropriate, request that O&M personnel remain either on site or off site to protect their health and safety as well as the health and safety of others.	
6	Coordinate with federal, state, and local agencies concerning public health and safety measures formulated in response to a pandemic.	
7	Operations Management will maintain regular communications with all staff and provide updates.	



### APPENDIX O – COMMUNICATION PLAN

#### I. Media and OPUC Communications

A. Plant personnel shall not make statements to, nor answer questions from media or OPUC personnel. Any questions directed to them, on or off the site, are to be referred to HEH personnel.

B. A single location will be designated for the formation of escorted tours to visit areas of interest that are secure and approved by the Director of Operations for observation. Unauthorized persons are not allowed onto the site until the emergency has been stabilized. It is extremely important that the plant entrance be kept clear for emergency response vehicles.

C. Since the media monitors the emergency radio frequencies, an emergency event may attract the media. Immediately notify the Director of Operations, who can coordinate arrangements for a qualified spokesperson to release a press statement. HEH contacts are identified in Appendix B.

#### II. ERCOT and PUCT Communications

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

III. Local and State Government and State Emergency Operations Center Communications

Communication with local government entities, such as fire and police officials, and with state emergency operations centers should be done through management. Communication with local government entities, such as fire and police officials, and with state emergency operations center shall be logged. Any communication with state officials should be coordinated with management. Any communication with state officials should be entered into the log.

#### **IV. Fuel Suppliers**

Not applicable. The site does not have any fuel suppliers supplying fuel to generate electricity at the site.



#### **APPENDIX P – CYBER SECURITY THREAT**

**Reporting a Cybersecurity Incident:** In the event an individual is aware of a cybersecurity incident or even suspects a cybersecurity incident, immediate notification to the contacts on Appendix B is required.

**Detecting a Cybersecurity Incident:** The following table lists different kinds of cybersecurity events that could happen at a plant and when/how to report them.

CATEGORY	EVENT DEFINITION	EVENT DETECTION:
Physical Security Perimeter Compromise	Unauthorized access of a person or a device through circumventing or	Unknown person or persons have breached the perimeter fence of the
	damaging the fences surrounding the site or doors to key site	plant - seen in person or on camera Unknown person or persons are
	buildings	inside plant facilities and have
		accessed secure areas, doors,
		control systems, substation systems, etc.
Computer system compromise	Attempted or successful plant	Unusual behavior of plant control
	computer system compromise	systems, user workstations, &/or
		servers. (for example, ransomware screen, anti-virus pop ups )
Information Theft or Loss	Unauthorized removal or loss of	Physical theft of plant information.
	sensitive information from the plant	Information sent intentionally or
	or plant systems	inadvertently to the wrong person or entity
Unauthorized Modification	Unauthorized addition or	Installation of unauthorized software
	modification of software or data	Installation of malicious software
		Unauthorized changing of system settings &/or configurations
Social Engineering	The attempt by an unauthorized	Phishing emails Phone calls SMS
	person to manipulate people into performing actions or divulging	messages Unusual websites or popups requesting information
	information	popups requesting information



# **APPENDIX Q – PRE-IDENTIFIED SUPPLIES FOR EMERGENCIES**

STEP	PRE-IDENTIFIED SUPPLIES FOR EMERGENCIES	
1	Ensure that three days of emergency rations and water are available for on-site monitoring staff	
2	Ensure that back-up power supply equipment is available and maintained.	



# **APPENDIX R – ALTERNATIVE FUEL AND STORAGE CAPACITY**

STEP	SUMMARY OF ALTERNATIVE FUEL AND STORAGE CAPACITY	
	Not applicable. There is no alternative fuel or storage capacity for this solar site.	