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October 11, 2023

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP LUMINA, LLC - Project No. 53385 - PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53 - PGC #20721

Dear Filing Clerk,

Pursuant to PUC Substantive Rule 25.53, IP Lumina, LLC is filing an emergency operations plan (EOP), executive summary, and affidavit under this section.

This initial filing includes:

- One (1) copy of the Executive Summary Letter
- One (1) copy of the signed affidavit affirming the content per Section 4(C)
- One (1) copy of IP Lumina LLC's Emergency Operations Plan

If you have questions about this submission, please contact
energyregulatory@intersectpower.com.

PROJECT NO. 53385

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

IP LUMINA, LLC'S EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

Pursuant to 16 Texas Administrative Code (“TAC”) § 25.53, IP Lumina, LLC (“IP Lumina”) hereby files an executive summary of its emergency operations plan known as the Emergency Action Plan (the “Plan”), which describes the contents and policies contained in the Plan, includes references to specific sections and page numbers of the Plan that correspond with the requirements of 16 TAC § 25.53, includes the Plan’s record of distribution, and attaches the required affidavit and a redacted copy of the Plan. This Plan supersedes the previously filed emergency operations plan that was in place during the construction phase.

IP Lumina is a Delaware limited liability company that owns and operates an approximately 320 MW (AC) solar photovoltaic generation facility in Scurry County, Texas (the “Facility”).

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

Attachment A to this Executive Summary is a redacted copy of IP Lumina's Plan. The purpose of the Plan is to outline and provide general guidelines for evaluating and responding to known and potential hazards or emergency conditions at the Facility site. The Plan provides directions and response to any emergency condition for all employees and visitors. All employees shall be trained in the actions that are to be taken should an emergency occur.

The Plan contains the following sections:

Content/Policies	Plan Reference
Facility Information	Section 1.1, Page 6
Applicability	Section 1.2, Page 6
Occupational Safety and Health Administration (OSHA)	Section 1.3, Page 6
Approval and Implementation	Section 1.4, Page 6
Training	Section 1.5, Page 6
Drill	Section 1.6, Page 7

Content/Policies	Plan Reference
Review and Revisions	Section 1.7, Page 7
Revision Control	Section 1.8, Page 7
Roles and Responsibilities	Section 2.0, Page 8-11
Lumina II Personnel	Section 2.1, Page 8
IP Lumina Generator Owner Compliance Manager	Section 2.2, Page 8
IP Lumina O&M Generator Operator Compliance Manager	Section 2.3, Page 8
Operations Control Center (OCC)	Section 2.4 Page 9
Plant Manager	Section 2.5, Page 9
Emergency Coordinators	Section 2.6, Page 9-10
Field Technicians	Section 2.7, Page 10
Asset Owner	Section 2.8 Page 10-11
Communication Plan	Section 3.0, Page 11-12
Media	Section 3.1, Page 11
PUCT	Section 3.2, Page 11
Office of Public Utility Council (OPUC)	Section 3.3, Page 11-12
Fuel Suppliers	Section 3.4, Page 12
Local and State Government Entities, Officials, and Emergency Operations Centers	Section 3.5, Page 12
Reliability Coordinator	Section 3.6, Page 12
Plan to Maintain Pre-Identified Supplies	Section 4.0, Page 13
Emergency Staffing Plan	Section 5.0, Page 13
Personnel Injuries or Serious Health Conditions	Section 6.0, Page 13-16
Basic First Response Actions	Section 6.1, Page 13-14
Physical Shock	Section 6.2, Page 14
Electric Shock	Section 6.3, Page 14

Content/Policies	Plan Reference
Burns	Section 6.4, Page 14
Fire Response Plan	Section 7.0, Page 16-18
Fire Discovery	Section 7.1, Page 16-17
Extinguishing Fire	Section 7.2, Page 17-18
Fire Extinguishers	Section 7.3, Page 18
Chemical or Oil Spills and Releases	Section 8.0, Page 18-20
Basic Actions	Section 8.1, Page 18-20
Weather Emergencies	Section 9.0, Page 21-22
Event Identification	Section 9.1, Page 21
Operational Plan for Cold Weather Emergency	Section 9.2, Page 21
Operational Plan for Hot Weather Emergency	Section 9.3, Page 22
Personnel Safety	Section 9.4, Page 22
Verification of the Adequacy and Operability of Fuel Switching Equipment	Section 10.0, Page 22
Water Shortage Annex	Section 11.0, Page 23
Restoration of Service Annex	Section 12.0, Page 23
Pandemic and Epidemic Annex	Section 13.0, Page 23
Hurricane Annex	Section 14.0, Page 23-30
Evacuation	Section 14.1, Page 23
Immediate Site Evacuation	Section 14.2, Page 23-24
Delayed Site Evacuation	Section 14.3, Page 24-25
Immediate Site Evacuation Procedure	Section 14.4, Page 25
Delayed Site Evacuation Procedure	Section 14.5, Page 27-29
Designated Egress Routes and Muster Areas for Evacuations	Section 14.6, Page 29-30
Re-Entry Procedures	Section 14.7, Page 30

Content/Policies	Plan Reference
Cybersecurity Annex	Section 15.0, Page 30
Physical Security Annex	Section 16.0, Page 30-32
Objectives for Physical Security Controls	Section 16.1, Page 30
Facility Physical Security Controls	Section 16.2, Page 30-31
Lock to O&M Building	Section 16.3, Page 31
Objectives for Physical Security Incidents	Section 16.4, Page 31
Facility Reporting Thresholds	Section 16.5, Page 31-32
Emergency Contacts	Appendix A, Page 33
Record of Distribution	Appendix B, Page 34

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

The Plan's record of distribution required by 16 TAC § 25.53(c)(4)(A) is included in Appendix B of the Plan.

C. Affidavit (16 TAC §§ 25.53(c)(1)(A)(i)(IV) and 25.53(c)(4)(C))

Attachment B to this Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

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

The list of primary and backup emergency contacts for IP Lumina required by 16 TAC § 25.53(c)(4)(B) is included in Appendix A of the Plan.

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

In addition to those items explicitly listed in 16 TAC § 25.53, the Plan addresses common operational functions relevant across emergency types, including:

Content/Policies	Plan Reference
Roles and Responsibilities	Section 2.0, Page 8-11
Communication Plan	Section 3.0, Page 11-12

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

Content/Policies	Plan Reference	Rule Reference
Introduction of Plan and outline of its applicability	Section 1.0, Page 6-7	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the Plan, and those who can change the Plan	Section 2.0, Page 8-11	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change made to the Plan since the initial Plan was adopted	Section 1.8, Page 7	16 TAC § 25.53(d)(1)(C)
Dated statement that the current Plan supersedes previous plans	Section 1.4, Page 6	16 TAC § 25.53(d)(1)(D)
Date the Plan was most recently approved by IP Lumina	9/7/2023	16 TAC § 25.53(d)(1)(E)

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

Section 3.0 describes the procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.

H. Plan to Maintain Pre-Identified Supplies (16 TAC § 25.53(d)(3))

Section 4.0 describes IP Lumina's plan to maintain pre-identified supplies for emergency response.

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

Section 5.0 describes IP Lumina's plan to address staffing emergency response.

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

Section 9.0 of the Plan includes IP Lumina's plans for monitoring and responding to severe weather as outlined below:

Content/Policies	Plan Reference	Rule Reference
Event Identification	Section 9.1, Page 21	16 TAC § 25.53(d)(5)

Content/Policies	Plan Reference	Rule Reference
Operational Plan for Cold Weather Emergency	Section 9.2, Page 21	16 TAC § 25.53(d)(5) 16 TAC §§ 25.53(e)(2)(A)(i), (iii)
Operational Plan for Hot Weather Emergency	Section 9.3, Page 22	16 TAC § 25.53(d)(5) 16 TAC §§ 25.53(e)(2)(A)(i), (iii)
Personnel Safety	Section 9.4, Page 22	16 TAC § 25.53(d)(5)
Hurricanes	Section 9.0, Page 21-22	16 TAC § 25.53(d)(5)

The Plan does not include a verification of the adequacy and operability of fuel switching equipment, because IP Lumina's Facility does not need fuels to operate. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply to IP Lumina.

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

As stated in Section 11.0, the Facility does not require water to operate. Therefore, 16 TAC § 25.53(e)(2)(B) requiring a water shortage annex does not apply to IP Lumina.

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

Section 12.0 identifies IP Lumina's plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat.

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

Section 13.0 addresses IP Lumina's pandemic and epidemic emergency response plan.

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

Although the Facility is not located in a hurricane evacuation zone, Section 14.0 contains IP Lumina's hurricane annex.

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

Section 15.0 contains IP Lumina's cyber security annex.

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

Section 16.0 contains IP Lumina's physical security annex.

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

The following list provides additional sections of IP Lumina's Plan that are appropriate for the IP Lumina facility:

Content/Policies	Plan Reference
Personnel Injuries or Serious Health Conditions	Section 6.0, Page 13-16
Fire Response Plan	Section 7.0, Page 16-18
Chemical or Oil Spills and Releases	Section 8.0, Page 18-20

R. Drills (16 TAC § 25.53(f))

IP Lumina plans to conduct a drill on its Plan in the first calendar year of commercial operations (i.e., by December 31, 2023).

September 18, 2023

Respectfully Submitted,

Lucas Dunnington
President
IP Lumina, LLC a Delaware limited liability
company

AFFIDAVIT

THE STATE OF INDIANA

§

§

COUNTY OF HAMILTON

§

BEFORE ME, the undersigned authority, on this day personally appeared Simon Ross who swore an oath that the following facts are true:

1. My name is Simon Ross. I am the Chief Commercial Officer of IP Lumina, LLC (“IP Lumina”) and am one of five of the highest-ranking officers with binding authority over IP Lumina. I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of IP Lumina. I have personal knowledge of the matters described herein.
2. Pursuant to 16 Texas Administrative Code (“TAC”) § 25.53, IP Lumina filed an emergency operations plan for the construction phase on December 29, 2022 and its annual update on March 15, 2023. The emergency operations plan (the “Plan”) provided with this filing supersedes the previously filed version.
3. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Plan, and such personnel are instructed to follow the applicable portions of the Plan except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
4. The Plan has been reviewed and approved by the appropriate executives.
5. Per 16 TAC § 25.53(f), IP Lumina plans to conduct a drill by December 31, 2023.
6. The Plan or an appropriate summary has been distributed to local jurisdictions as needed.
7. IP Lumina maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
8. IP Lumina’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.

FURTHER AFFIANT SAYETH NOT.

[Signature Page to Follow]

IP Lumina, LLC, a Delaware limited liability company



Simon Ross
Chief Commercial Officer

Sworn to and subscribed before me on October⁴____, 2023.



Notary Public, State of Indiana
My Commission Expires:



Notarized remotely via Notarize, Inc.

IP Lumina, LLC

POLICY NAME	Emergency Operations Plan
ISSUED DATE	10/11/23
VERSION NO.	1.0

VERSION HISTORY				
VERSION	APPROVERS	ISSUED DATE	DESCRIPTION OF CHANGE	AUTHOR(S)
1.0	Director, Operational Compliance; HSE Principal; VP, Operations; Chief Commercial Officer	10/11/23	New Procedure	B. Knowles, C. Wall, K. Macpherson

Version 1.0 of this EOP supersedes all previous EOPs as of issued date.

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