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LEA COUNTY ELECTRIC COOPERATIVE

EMERGENCY OPERATIONS PLAN

October 12, 2023

Table of Contents

I. Approval and Implementation Section

a. Introduction: Discuss the Emergency Operations Plan and its applicability to facilities, employees, and contractors. This plan is intended to protect life and property and ensure continuity of adequate electric service during emergencies.

b. The individuals listed below are responsible for maintaining and implementing this EOP and possess the requisite authority to change this EOP.

c. EOP Revision History

Date	Individual Making Edits	Reason/Comments
02/21/2022	Laura Finley	Annual review
10/12/2023	Chris Bessenecker	Add pertinent information for LCEC

d. As of April 1, 2022, this EOP supersedes all previous EOPs and EPPs.

e. This EOP was most recently updated and approved on April 1, 2022.

II. Record of Distribution

a. This document has been distributed to the following individuals:

Date of Distribution	Distributed to: Name	Title
	Bobby Kimbro	Manager of Engineering and Operations
	Alfredo Melendez	Director of Line Operations
	Chris Bessenecker	Manager of Administrative Services/Compliance/Safety/Facilities
	Kyle Coleman	Manager of IT/Communications
	Rosie Insilan	Manager of Marketing and Member Services
	Denise McDaniel	Manager of Accounting and Customer Services
	Shilo Sealy	Safety Coordinator
	Web page	For all employees to access

III. Emergency Contacts

LCEC Emergency Contacts			
Title	**Name**	**Mobile Phone**	**Extension**
General Manager	**Bobby Ferris**	**575-361-6277**	
Manager of Engineering & Operations	**Bobby Kimbro**	**575-704-2465**	
Director of Line Operations	**Alfredo Melendez**	**575-390-5130**	
Manager of IT/Communications	**Kyle Coleman**	**575-390-1224**	
Manager of Marketing and Member Services	**Rosie Insilan**	**575-602-2366**	
Manager of Accounting and Customer Services	**Denise McDaniel**	**575-396-9639**	
Manager of Administrative Services/Compliance/Safety/Facilities	**Chris Bessenecker**	**575-552-2480**	
Supervisor of Staking and GIS	**John Cartwright**	**575-390-3781**	

IV. Affidavit

a. Affidavit from Bobby Ferris, General Manager attached.

V. Communication Plan

a. The following describes the procedures that LCEC will use to communicate with the public, media, customers, and the commission as well as the process for handling complaints during an emergency.

VI. Pre-stocking of Supplies

The following items are strongly dependent on the warehouse and pole yard for normal operating conditions and during emergency conditions.

- Storage and maintenance of equipment and vehicles such as digger derricks, aerial devices, stringing equipment, small vehicles, forklifts, etc
- Storage and inventory of materials such as poles, cross arms, transformers, wire, etc

- Storage and inventory of tools such as heavy presses, hand tools, personal protective equipment, cover-up and other protective devices
- Storage and dispensing of gasoline, diesel fuel and LP gas for vehicles and equipment
- Safeguarding of assets including building, equipment and inventory
- Non-interruption of utilities for both cooperative property and members, if applicable, including electric, gas, propane, water and telephone
- General maintenance of warehouse facilities including structural integrity, sanitary facilities (restrooms, port-a-pots, washroom/showers), trash disposal (waste, scrap material, hazardous materials, etc.)
- Storage and inventory of IT/Communications related equipment

VII. Staffing During Emergencies

- The issue of personnel is a major variable in disaster recovery and other emergencies. Assess and evaluate number of personnel available for duty, resources available and location of operation.
- Assess and evaluate availability, condition and needs of employees due to impact on employees' homes and families directly affected by loss of personal property and shelter or pandemic.
- Assess and evaluate the need and process of hiring new employees to fill the spots left by injuries, fatalities, or illness.
- Assess and evaluate the use of employees from neighboring cooperatives if needed.
- Cross-training and job-sharing will assist in mitigating potential losses.
- In the event of an emergency and the potential for loss of personnel, the following items are important to the continuity of service:
    - Safety of employees and their families.
    - Preparation for any loss of personnel.
    - Prioritize business functions.
    - Action plans developed.
- Administration of Cooperative's safety program & policies, emergency preparedness plan and investigations.
- Adhere to federal and state official's mandates and recommendations.
- Assist Accounting Services with records access and management for payroll, benefits, workers' compensation/disability, risk management, certificates of insurance, property, organizational chart, pay rates and board policies.
- The following items are strongly dependent to the smooth operation of the business during normal operating conditions and/or emergency conditions:

- Job descriptions including documented, detailed procedures on how to do each job are available in hard copy format and on the network which is backed up weekly. Wage and salary benefits, carriers documented and backed up weekly.
- Specific "key" positions are defined and cross training/job sharing for these positions is provided.
- Working relationship with contractors, municipals, IOUs, retired employees and other cooperatives are maintained.
- Employees are insured through the Cooperative's benefit programs. Contact information is maintained on the network and updated weekly.
- Legal issues involving insurance, workers' compensation, etc., in regard to permanent and temporary employees, have been addressed with carriers and corporate attorney.
- Identification of a grief counselor, if necessary.
- Location of lodging and food resources.
- Set up of Vital Services Command Center.
- Communicate with employees and their families.
- Safety contacts and resources.
- Workers' Compensation contacts and resources.
- Property/Risk Management contacts and resources.
- Coordinate environmental issues.

VIII. Weather Related Hazards

a. Weather forecasts through weather apps
   Alerts from Texas Division of Emergency Management
   SCADA notifications
   Alerts from central agency
   National Weather Service
b. Roll call initiated
   One Crew always on standby
   Notification to key individuals
   Group text

IX. Annexes:

- Contact property and casualty insurer.
- External communications – maintain consistency through approved corporate statement.
- Contact business partner for spare equipment and assistance recovering essential data (see Information Systems and Paper Records section).
- Acquire publicly accessible building (strip mall, warehouse, etc.).

- Use the media to inform the members of the temporary location, if necessary.
- Implement IVR phone system messaging as required.
- Use realtors as a resource to identify property that can be used as a temporary site or a new permanent site, if needed.
- Lease temporary office trailers.
- Set up various employees to work from home, if necessary. Have a detailed plan in place that identifies what can be done at home and how it can be done.
- Consider asking for partial property use of neighboring Cooperatives, IOUs, municipals, businesses and/or schools.
- Obtain essential office furniture and equipment from local and/or regional suppliers.
- Provide security on site (employees, vendor, fence, guards). Local law enforcement or contracted security services.
- Establish clean-up crew for site using employees or contractors.

a. **Cooperative Annex:**
   i. Cold Weather Emergency
      1. Operational plans to mitigate the hazards of a cold weather emergency
      2. Checklist for transmission facility personnel to use
      3. Pre- and post-weather emergency meetings to review lessons learned from past cold weather emergency incidents and to ensure necessary supplies and personnel are available throughout the emergency.
   ii. Hot Weather Emergency
      1. Op plans to mitigate the hazards of a cold weather emergency
      2. Checklist for transmission facility personnel to use
      3. Pre- and post-weather emergency meetings to review lessons learned from past cold weather emergency incidents and to ensure necessary supplies and personnel are available throughout the emergency.
   iii. Load Shed
      1. Describe the procedures for controlled shedding of load, whether caused by planned or forced interruption of service.
      2. Set forth the priorities for restoring shed load to service.
      3. List the critical load customers that LCEC directly serves. The list shall be updated annually or whenever necessary. Describe how LCEC will maintain an accurate registry, LCEC's process for aiding critical load customers in the event of an unplanned outage, the process for communicating with critical load customers, and

the process for training staff with respect to serving critical load customers.

iv. Wildfire
    1. Describe LCEC's established wildfire response strategies and its plans to mitigate the hazards of wildfire to its facilities.

v. LCEC does not serve load in an area affected by hurricanes, therefore that requirement of 25.53(e)(1)(F) does not apply and is not addressed in this EOP.

vi. Pandemic and epidemic.

PANDEMIC PREPAREDNESS PLAN

GENERAL

Purpose

While it is not possible to predict when or if a pandemic situation will occur, or how long it will last should it occur, this document addresses a general overview of the plan for such an incident. Pandemic planning by nature emphasizes health aspects in continuity planning, but the overall purpose of the plan is to maintain business activities and operations.

Scope

The Pandemic Preparedness Plan covers aspects of business continuity in the event of a pandemic situation. Other events that have the potential to disrupt business activities and operations are covered in additional documents including, but not limited to, the Emergency Preparedness Plan/ the Business Continuity Plan.

Responsibilities

The Pandemic Response Team is responsible for oversight, implementation, and maintenance of this document. Should it be necessary to implement this plan, this team will work together with department managers to ensure that minimal business interruptions occur.

Pandemic Response Team members include:

- GM, Manager of Administrative Services/Compliance/Safety/Facilities, Manager of Communications/IT Services, Manager of Marketing/Member Services, Manager of Line/System Operations, Manager of Accounting/Customer Service, Manager of Distribution/Engineering.

PLAN PHASES

The plan consists of the following phases:

- Preparedness and Communication
- Surveillance and Detection
- Response and Containment
- Recovery and Documentation

The plan relies heavily on Federal, State, and Local health and government officials and the orders issued by those officials to determine which phase we are in and what specific

actions to take. The below actions are guidelines but subject to change based on the recommendations of these federal, state and local health and government officials and the needs of the Cooperative to maintain its business continuity or other concerns.

	Transmissibility and Risk to Humans	Pandemic Plan Activities
Phase 1	Risk to humans is low	• Employees are educated to ensure pandemic awareness. • Coordinate planning with critical infrastructure providers • Test the pandemic plan to assess readiness and strengthen as needed.
Phase 2	Risk to humans is moderate and building	• Educate key suppliers • Continue all phase 1 activities • Initiate communication plan with all members • Commence social distancing/remote access, telework and outposts as necessary • Develop payment plan communications to highlight the features of on-line payment, pre-payment and drop box, if applicable • Initiate specific PPE training sessions • Implement supply stockpile strategy • Increase situational awareness
Phase 3	Risk to humans is prevalent	• Communicate phase change with members • Continue all phase 2 activities • Raise level of pandemic awareness
Phase 4	Isolated clusters of less than or equal to 10 people and lasting less than or equal to 2 weeks. Risk to humans is substantial	• Communicate phase change with members • Continue all phase 3 activities • Ensure that all staff know what to do to prevent personal and family infection • Implement pandemic web site/alerts • Implement travel restrictions and quarantine if applicable • Implement close surveillance of pandemic
Phase 5	Smaller clusters of less than or equal to 5 people and lasting	• Communicate phase change with members • Continue all phase 4 activities

	greater than 2 weeks. Risk to humans in extreme.	• Continuous situational surveillance of pandemic
Phase 6	Avoid personal contact. Risk to humans is at maximum	• Minimize impact of Pandemic • Continue all phase 5 activities • Implement full personal protective and containment measure if applicable • Assess sufficiency of plan measures daily and adjust as needed

Preparedness and Communication

LCEC will implement the following in their efforts to be prepared for a potential pandemic event and its related communication contingencies.

- Chain of command communication for getting instructions to all staff
- Each department should refer to their own business continuity/emergency preparedness plan if appropriate.
- Department Managers maintain a current roster of their employees with their contact information. They will notify their employees should there be a situation that would impact the performance of their normal job duties and provide them with necessary instructions.
- Manager of Administrative Services will maintain a centralized roster
- Key employees may be authorized and approved to have remote access, allowing them to maintain daily operations without physically being onsite. They are to check their email, text, and voicemail regularly to ensure that important messages are retrieved, and business is conducted in a timely and appropriate manner.
- Employees working remotely will work with the IT Department to identify and correct any potential connectivity issues in advance.
    - LCEC will create a culture of infection control in the workplace Information about recommended practices to reduce the spread of infection
    - Distribution of adequate infection control supplies including hand sanitizers, tissues, and disinfecting wipes.
    - Instructions on proper procedures for cleaning high-touch surfaces including keyboards, telephones, doorknobs, etc.
- LCEC encourages employees and their families to get annual vaccinations if available.

Surveillance and Detection

Pandemic Response Team will:

- Monitor staffing levels (including contractor/mutual aid levels) to ensure that available resources do not fall below critical levels.
- Each department should refer to their own business continuity/emergency preparedness plan.
- Monitor local health advisories to determine when the optimal time approaches to begin shifting key staff to working remotely to reduce contact with possible infected staff.

- Determine when it becomes appropriate to reduce the availability of services at a specific location, such as front desk operations, collections contact, field personnel contact with the public.
- Determine when it becomes appropriate to close specific offices
- Educate all employees as to pandemic symptoms and become proactive at directing infected staff to medical facilities for treatment at the employee's own expense/insurance.
    - Any employer directed time off due to symptoms may require the employee to utilize available PTO. If PTO time is unavailable, the missed hours will be unpaid unless deemed otherwise by the General Manager.

Response and Containment

Should a potential pandemic outbreak occur, LCEC will:

- Communicate initial notification to all employees
- Activate communications through chain of command to inform staff of company guidelines and keep all employees updated on the situation
- Communicate periodic updates through the use of mobile communications
- Each department should refer to their own business continuity/disaster recovery plan if appropriate.
- Have key staff begin working remotely to minimize contact with others, including the rerouting of phone extensions to ensure all incoming calls and messages are received in a timely manner
- Communicate any changes in services (front desk, appointment only, closure) to the customers by posting lobby and door signs and posting a notice on the website home page, as directed by Communications
- Have signage posted at all entrances to the facility advising staff and visitors not to enter if they have influenza/coronavirus symptoms
- Department managers will advise employees not to come to work when they are feeling ill, particularly if they are exhibiting any symptoms and to consult a health care provider, if necessary, at employee's own expense.
    - Any employer directed time off due to symptoms will require the employee to utilize available PTO. If PTO is unavailable the missed hours will be unpaid unless deemed otherwise by the General Manager.
- Advise staff members that have been told to stay home to stay in contact with management through regular telephone and email.

Recovery and Documentation

Once the pandemic situation subsides and the staff is healthy enough to report back to work at normal (pre-pandemic) levels:

- LCEC may resume its usual day-to-day business operations at all locations.
- Remote staff will be instructed to return to their normal workstations and job responsibilities.
- Communication through chain of command will be placed in standby status Communication will be updated to reflect "business as usual" status

Follow-up documentation will be maintained as part of LCEC's disaster recovery records, making note of significant lessons learned, actions taken, and recommended changes in

procedures for future pandemic situations. In addition, the Pandemic Response Team will document all ongoing and routine testing and preparedness planning efforts to ensure the cooperative is able to respond quickly and efficiently in the event of a pandemic disaster.

Actions Taken if an employee has symptoms or tests positive for the pandemic disease or virus:
The Cooperative will rely on Federal, State, and Local Health and Government Official guidelines to determine the course of action to take if an employee of the Cooperative has symptoms of and/or tests positive for the pandemic disease or virus but reserves the right to deviate from those guidelines based on the needs of the Cooperative to sustain its business continuity or other concerns.

Actions Taken if an employee has symptoms of or tests positive for the pandemic disease or virus that has been in contact with employees while at work location.:
If an employee tests positive for the pandemic disease or virus, the Cooperative will quarantine any employee that may have been exposed to the virus. The Cooperative will thoroughly disinfect anything that may be carrying the virus.

vii. Cyber Security Incidents

- The following items are strongly dependent on information and communications technologies for the normal operation of the cooperative during emergency conditions:
    - Maintenance of all Enterprise Business Software.e.g. billing accounts receivable, accounts payable, payroll, staking, mapping, outage management, etc.
    - Microwave/ Fiber connectivity between locations
    - Phone system - VOIP
    - Microwave / Fiber communications between all substation and switches.
    - Land Mobile Radio (LMR) system.
    - Fax Machine
    - Email
    - Internet
    - Supervisory Control and Data Acquisition (SCADA).
    - Cellular phones.
    - Backups

Risk Mitigation Efforts

- Crews are equipped with cell phones
- Network diagrams, to assist in rebuilding system, have been created and stored offsite and on the network.
- Vendor list is maintained and stored offsite and on the network.
- Critical information is backed up and/or duplicated and stored offsite and on the network.
- LCEC has a Backup Continuity Recovery Service (BCRS) contract with IT business partner, for software packages.
    - LCEC notifies business partner of an Outage Emergency
        - Host client data available within 24 hours of data receipt.
        - Host access for 24-hours a day, 7 days a week, for 7 business days.

Backup/Restore Schedule and Methodology

LCEC's first level of backup/restore is done via Windows Shadow Copy. Retention is dependent on the server and folder and ranges from 10 to 60 days.

VMWare Environment

LCEC currently utilizes a disc and tape backup/restore solution.

LCEC's server backup to disk methodology is based on three priority levels. These levels are described below and are based on the frequency of change in the data that occurs on a given server.

1. Priority One (P1) – These are servers that experience a great deal of change in their data therefore backups are more frequent. The P1 scheme is: Daily incremental, weekly synthetic/full on Sunday with 3 restore points.
2. Priority Two (P2) – Data change is less frequent. The P2 scheme is: Weekly synthetic/full on Sunday with 3 restore points.
3. Priority Three (P3) – Data change rarely occurs. The P3 scheme is: Monthly synthetic/full taken on the last Sunday of the month with 2 restore points.

LCEC's server backup to tape methodology is also based on three priority levels. The levels are described below.

1. Priority One (P1) – Weekly backup of synthetic/full of the P1 systems. Includes 8 tapes in the rotation for a total of 60 days of retention.

2. Priority Two (P2) – Weekly backup of synthetic/full of the P2 systems. Includes 2 tapes in rotation for a total of 14 days of retention.
3. Priority Three (P3) – Monthly backup of the synthetic/full of the P3 systems. Includes 2 tapes in rotation for a total of 60 days of retention.

Workstations/PC

Backups are not performed on these systems. User profile data is accessed from a file server and backed up under the schemes listed above.

Switches/Routers

LCEC utilizes a Network Configuration Manager (NCM) to backup firewall, switch and router configurations.

Short-Term Recovery Efforts

Short-term actions to consider following an emergency involving loss of network hardware, data or communications include:

- Assess/address coverage issues and safety issues of using alternate radio or phone systems.
- Forward to Call Center, another cooperative, business, employees' homes.
- Use mobile phones and obtain more as needed.
- Move physical telecom equipment (switch, computer, handsets) to alternate location.
- Contact Phone Company – switch number routing, as needed.
- Use land lines if possible (field personnel call from member phone or pay phone).
- Use company radio.
- Move virtual servers by priority to alternate host located at Plant server room or Lovington server room.
- See Vendor List and contact applicable vendors to acquire essential equipment.
- Restore from backup all impacted software and data.
- Contact business partner for Backup Continuity Recovery Services
- If necessary, assign eligible employees to work from home using virtual private network software.

Long-Term Recovery Efforts

Long-term actions to consider following an emergency involving loss of network hardware, data or communications:

- Address FCC requirements.
- Document/assess vendor response time and capabilities to improve understanding of future needs.

Physical Security Incidents

- Fences
- Cameras
- Locks
- Lighting
- Alarms

b. **Generation Co-op**

i. Weather emergency annex

1. Operational plans for responding to cold or hot weather emergencies
2. Verify adequacy and operability of fuel switching equipment, if installed
3. Checklist for personnel to use during weather emergency; include lessons learned from past emergencies to ensure supplies and personnel available

ii. Water shortage annex

iii. Restoration of service annex – plan to restore generation resource to service

iv. Pandemic and epidemic annex

v. Any additional annexes needed or appropriate for the co-op

X. Drills

a. A drill shall be conducted annually to test this EOP if the EOP is not implemented in response to an incident within the last 12 months. (Keep records of all drills conducted.)

b. This EOP will be revised as needed after each drill.

c. At least 30 days prior to at least one drill each year, LCEC will notify commission staff by email or other written form, of the date, time, and location of the drill.

XI. Emergency Operation Plan Activation History

This section sets forth each incident in the prior calendar year that required LCEC to activate its EOP and a summary of the circumstances that required activation. This information along with a summary after-action report, including lessons learned and an outline of changes made to the

EOP as a result, if any, will be filed with the annual EOP submittal to the Public Utility Commission of Texas.

AFFIDAVIT OF BOBBY FERRIS

(Affidavit of Entity's Highest-Ranking Official)

Bobby Ferris, of lawful age, being duly sworn upon oath states as follows:

1. I am the Executive Vice-President and General Manager of Lea County Electric Cooperative ("LCEC"). I have served in this position since July 1, 1997.
2. LCEC was formed in 1949, by its members as an electric cooperative under New Mexico law. LCEC provides power to members in Chaves, Eddy, and Lea Counties in New Mexico and parts of Cochran, Gaines, and Yoakum Counties in west Texas.
3. Relevant operating personnel are familiar with and have received training on the contents of this EOP, and such personnel are committed to following the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
4. This EOP has been reviewed and approved by the appropriate executives.
5. Required emergency activation drills have been conducted.
6. This EOP or an appropriate summary has been distributed to local jurisdictions as needed.
7. LCEC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

8. LCEC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received National Incident Management System training, specifically IS-700.a, IS-800.b, IS-100.b, and IS-200.b.

Bobby Ferris
Executive Vice-President and General Manager
Lea County Electric Cooperative

Subscribed and sworn to before me this _____ day of _____, 2022.

Notary Public

My commission expires:

Commission No.:

NEW MEXICO RURAL ELECTRIC COOPERATIVES

LCEC WILDFIRE MITIGATION PLAN

DATE: October 2023

PROJECT: NM21-001

REVISION: 2

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1 Introduction/Executive Summary

Since the state of New Mexico does not currently have Wildfire Mitigation Plan (WMP or Plan) requirements, this plan was developed to be consistent with current industry best management practices. While WMP requirements are under development and will vary by state, the plans in general are likely to direct utilities to develop operational policies and practices to prevent, prepare for and respond to wildfire events. WMPs are likely to be evaluated or updated on an annual basis and may be subject to board approval.

Fire mitigation plays an essential role in LCEC's operational practices. Its existing policies, programs and procedures are designed to directly or indirectly manage or reduce this risk. Over the years, LCEC has adopted additional fire mitigation programs to adjust to changes in the burning environment, adopted technological advances, and improved operational practices to further mitigate the potential for ignitions and more effectively respond to apex wildfire risk conditions.

1.1 Purpose of the Plan

The Plan describes the LCEC's strategies, programs, and procedures to mitigate the threat of electrical equipment ignited wildfires, and addresses the unique features of its service territory, such as topography, weather, infrastructure, grid configuration, and areas most prone to wildfire risks. This includes the maintenance of its transmission and distribution (T&D) assets as well as the management of vegetation in the ROWs that contain these assets.

LCEC's Board of Directors reviews, and approves the Plan as needed, while the General Manager is responsible for its implementation. Primary accountability for plan implementation resides with the Manger of Compliance.

1.2 Objectives of the WMP

The main objective seeks to implement an actionable plan to create increased reliability and safety while minimizing the likelihood that LCEC's assets may be the origin or contributing factor in the ignition of a wildfire. The mitigation programs and strategies will comply with current and anticipated New Mexico State law, and National Electric Safety Code (NESC) regulations and guidelines. To help develop the Plan, LCEC compared emerging technologies that not only reduce the likelihood of a service interruption, but also minimize the risk of ignition from the fault causing the outage.

The secondary objective is to measure, through the annual evaluation of certain performance metrics, the effectiveness of the specific wildfire mitigation strategies. Where a

particular action, program component or protocol proves unnecessary or ineffective, will assess whether modification or replacement is suitable.

1.3 Utility Profile and History

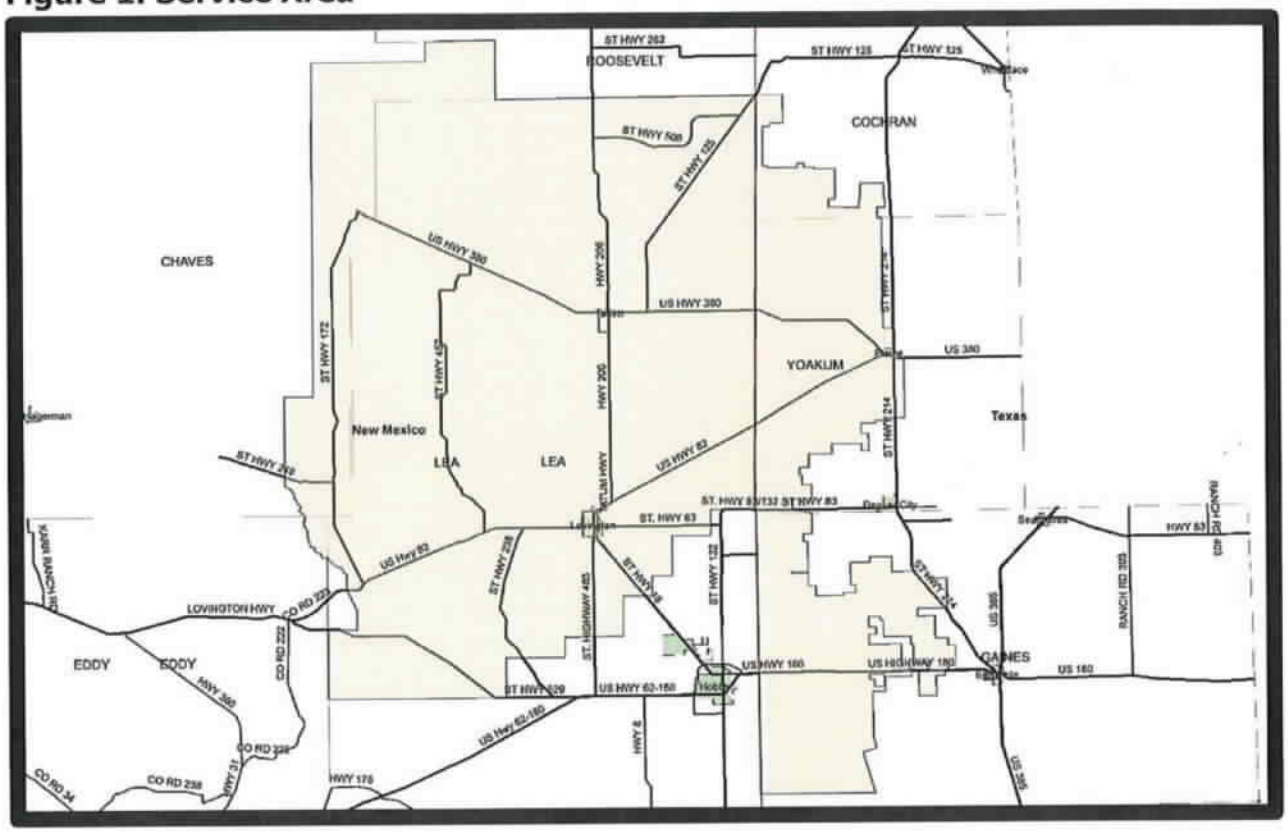
- The Cooperative was founded in May 1946 and has over 80 full-time employees, an annual load factor of 1,384,000,000 KwH sales. The system includes 32 substations, 10 switch stations, and 5 transmission interchange stations. Over 4300 miles of energized line serving more than 7,000 consumers and over 16,000 meters in parts of Chaves, Eddy, and Lea Counties in New Mexico and parts of Cochran, Gaines, and Yoakum Counties in west Texas with a total utility plant of $168,000,000.

- The Cooperative has nine (9) dedicated trustees, who along with management and employees, have led Lea County Electric through changes and growth.

1.4 The Service Area

- Lea County Electric's main office is in Lovington at 1300 W Ave D and the warehouse at 2517 Power Plant Rd.
- Counties served: Chaves, Eddy and Lea in NM and Cochran, Gaines, and Yoakum in TX.
- Service area: 4300 square miles
- Service area is dry and flat
- Average yearly temp 59.5
- Average yearly Precipitation 12 inches

Figure 1. Service Area



2 Overview of Utility's Fire Prevention Strategies

This WMP integrates and interfaces with LCEC's existing operations plans, asset management, and engineering principles, which are themselves subject to change. Future iterations of the WMP will reflect any changes to these strategies and will incorporate new best management practices as they are developed and adopted.

Table 1 summarizes LCEC's five mitigation components with associated programs and activities that support LCEC's ongoing commitment to wildfire prevention and mitigation.

Table 1. Mitigation Strategies/Activities

DESIGN AND CONSTRUCTION
Transmission lines- Non-wood poles replace wood poles in strategic areas – Planning
Field recloser to vacuum-type breaker change-out program – YES
Covered jumpers and animal guards - YES
Non-expulsion fuses in select high-risk areas – YES
Avian protection construction standards - YES
Increase overhead wire spacing to reduce wire to wire contact – NO
Substation perimeter fencing for security and protection - Evaluating
INSPECTION AND MAINTENANCE
Infrared inspections of substation equipment - YES
Unmanned Aerial Vehicle (UAV) T&D line inspections - NO
UAV IR and LiDAR inspection program - NO
Wood pole intrusive inspection and testing - YES
Enhanced T&D vegetation right-of-way maintenance - NO

INSPECTION AND MAINTENANCE (cont.)
Distribution system line patrols and detailed inspections - YES
T&D system vegetation management program - NO
Increased removal rate of undesirable trees on right-of-way's - NO
Enhanced vegetation management prior to fire season - NO
Thermal imaging cameras - YES
Enhanced line patrols during fire season - YES
OPERATIONAL PRACTICES
Work procedures and Fire Hazard training for persons working in locations with elevated fire risk conditions - YES

Community outreach/wildfire safety awareness - YES
Contractor/staff safety training and orientation for vegetation management work - NO
Alternate recloser practices during fire weather - NO
Fire suppression equipment on worksite during fire season - YES
Provide liaison to county offices of emergency services (OES) during fire event - NO
SITUATIONAL AWARENESS
Weather Monitoring in the service area - YES
Utility-owned weather stations - NO
Monitoring active fires in the Southwest - YES
RESPONSE AND RECOVERY
Pre-emptive de-energization protocols - NO
Coordination with local Department of Emergency Management - YES
Customer assistance programs for post-disaster recovery - NO
Line patrols before re-energization - YES
Emergency Restoration Plan - YES

3 Utility Asset Overview

- Main Office (Lovington), District Offices (Tatum and Plains, TX)
- Main Warehouse (Lovington)
- 347 Miles of Transmission Line
- 3,957 Miles of Overhead Distribution
- 54 Miles of Underground Distribution
- 32 Substations
- 7,200 and 14,400 Voltages

Table 2 provides a high-level description of LCEC's T&D assets.

Table 2. Asset Overview

ASSET CLASSIFICATION	ASSET DESCRIPTION
Transmission Line Assets	Approximately 347 miles of conductor, transmission structures and switches at 69 kilovolts (kV).
Distribution Line Assets	Approximately 3,957 miles of overhead (OH) and 54 miles of underground (UG) conductor, cabling, transformers, voltage regulators, capacitors, switches, lined protective devices operating at or below 25kV.
Substation Assets	Major equipment such as power transformers, voltage regulators, capacitors, reactors, protective devices, relays, open-air structures, switchgear and control houses in 32 substation/switchyard facilities.

4 Risk Analysis and Risk Drivers

4.1 Fire Risk Drivers Related to Construction and Operations

LCEC staff evaluated other utility's fire causes and applied its own field experience to determine the critical potential risk drivers. The categories listed below were identified as having the potential for causing powerline sparks and ignitions:

- Equipment/facility failure
- Foreign contact
- Vehicle impact
- Standard expulsion fuses
- Cross-phasing
- Age of assets
- Vandalism
- Wildlife
- Livestock

4.2 Fire Risk Drivers Related to the Service Area

- Accessibility
- Climate
- Vegetation types / fuels
- Fire history
- Tree mortality / tree failure
- Lightning
- Fire weather
- Heavy winds
- Ice

4.3 Key Risk Impacts

Ignitions caused by the aforementioned RDs have many possible outcomes. The list below outlines some of the worst-case scenarios and consequences:

- Personal injuries or fatalities to the public, employees and contractors
- Damage to public and/or private property
- Damage and loss of LCEC owned infrastructures and assets
- Impacts to reliability and operations
- Damage claims and litigation costs, as well as fines from governing bodies
- Damage to LCEC's reputation and loss of public confidence

5 Wildfire Prevention Strategy and Programs

This chapter shall provide descriptions of the preventive strategies and programs in use by the utility to minimize the risk of its assets causing wildfires. Some of strategies to outline in subsections below include:

- PSPS protocols
- Inspection programs, including intervals, tracking, record keeping, etc.
- Pole testing
- Vegetation management
- Fire mitigation construction
- Pilot programs
- Emerging wildfire mitigation technologies

Table 3. Activities That Address Wildfire Risk Factors

RISK FACTOR	MITIGATION ACTIVITY
Fuel Source	• Comprehensive vegetation management program • Enhance vegetation Line Inspections • Enhanced ROW maintenance and clearing specifications • Enhanced inspection intervals and spot checks in high-risk areas • Selective use of non-expulsion fuses • Enhanced tree removal efforts • Current limiting fuses
Extreme Weather	• National weather service monitoring • USFS/WADNR IFPL monitoring • Alternate recloser settings in fire prone areas • LCEC-owned weather station pilot program • Pole mounted camera pilot program • Preemptive power shutdown during ongoing wildfires • Emergency preparedness community outreach and education
Contact with Foreign Objects	• Increased wildlife guards • Avian Protection construction standards • Insulated equipment • Covered Jumpers • Underground conversion of distribution lines • Hazard tree removal
Equipment Failure	• Routine Maintenance • Design and construction standards to reduce ignition sources • Transmission line detailed inspections and annual patrols • Distribution line routine patrols • De-energizing or alternate settings of lines during certain conditions • Infrared inspections of substation equipment • Wood pole test and treatment program • UAV inspections on all transmission circuits
Field Work	• LCEC worker/contractor education on fire ignition sources • Tailgate meetings before fieldwork • USFS fire restriction level monitoring

5.1 Transmission and Distribution System Operational Practices

5.1.1 De-energization – Public Safety Power Shutoff

A Public Safety Power Shutoff (PSPS) preemptively de-energizes power lines during high wind events combined with hot and dry weather conditions. When considering de-energization, LCEC examines the impacts on fire response, water supply, public safety, and emergency communications.

LCEC considers the external risks and potential consequences of de-energization while striving to meet its main priority of protecting the communities and members we serve. They include:

- Potential loss of water supply to fight wildfires due to loss of production wells and pumping facilities.
- Negative impacts to emergency response and public safety due to disruptions to the internet and mobile phone service during periods of extended power outages.
- Loss of key community infrastructure and operational efficiency that occurs during power outages.
- Medical emergencies for members of the community requiring powered medical equipment or refrigerated medication. Additionally, the lack of air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities.
- Traffic congestion resulting from the public evacuation in de-energized areas can lengthen response times for emergency responders.
- Negative economic impacts from local businesses forced to close during an outage.
- The inability to open garage doors or motorized gates during a wildfire event can lead to injuries and fatalities.

The risks and potential consequences of initiating a PSPS are significant and extremely complex. Based on the above considerations, LCEC reserves the option of implementing a PSPS when conditions dictate. While LCEC believes the risks of implementing a PSPS far outweigh the chances of its electric overhead distribution system igniting a catastrophic wildfire, the PSPS provides a last resort tool and another mitigation option in a potential crisis.

On a case-by-case basis, LCEC has historically and will continue to consider de-energizing a portion of its system in response to a known public safety issue or response to a request from an outside emergency management/response agency. Any de-energizing of the lines is performed in coordination with key local partner agencies; however, the final determination is made by LCEC.

5.2 Infrastructure Inspections and Maintenance

Recognizing the hazards of equipment that operate high voltage lines, LCEC maintains a formal inspection and maintenance program for distribution, transmission, and substation equipment.

The Director of Line Operations and Troubleshooting Foreman oversee most of the time-based system inspection programs. The Supervisor of Distribution Staking oversees the wood pole inspection program. LCEC currently patrols its system regularly and is increasing the frequency of inspections in high-risk areas. Table 4 summarizes the inspection schedule for all assets, while the following sections outline inspection practices for the utility.

Table 4. Inspection Program Summary

ASSET CLASSIFICATION	INSPECTION TYPE	FREQUENCY
Overhead Transmission	Safety Patrol Inspection	Annually
	Detailed Inspection	Annually
	Wood Pole Testing	Annually
Overhead Distribution	Safety Patrol Inspection	Annually
	Detailed Inspection	Annually
	Wood Pole Testing	Annually
Underground Distribution	Safety Patrol Inspection	Annually

Substation	Routine Inspection	Monthly

5.2.1 Definition of Inspection Levels

1. **Safety Patrol Inspection:** A simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.
2. **Detailed Inspection:** Individual pieces of equipment and structures are carefully examined, visually and through use of routine diagnostic testing.
3. **Intrusive Pole Inspection:** Inspections involving the movement of soil, taking samples of the wood pole for analysis, and/or using more sophisticated diagnostic tools beyond visual inspections.

5.2.2 Safety Patrol Inspections of Transmission and Distribution Lines

Crews and Staking-techs examine powerlines, poles, and substations on a daily basis; performing visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards.

5.2.3 Detailed Inspections of Transmission and Distribution Lines

After the line has been visually inspected and deemed in need of attention a workorder is created and crews work of the workorder. Emergency poles are looked at that day, prioritized and replaced based on priority. As part of our hazard recognition. Each Hazard is issued a priority level from 1 to 3, 1 being immediate danger, action needed now. Each hazard will have the corrective action taken, who completed the action, who it was inspected by and filed with the safety coordinator and System Operations.

5.2.4 Wood Pole Testing and Inspection

To maintain LCEC wood poles, a formal Wood Pole Assessment Plan was initiated with the goal to inspect a minimum of 8.3% of the system each year. The pole inspection program also includes sound, visual, ultrasound and inspections of non-wood poles. Wood pole inspections are carried out on a planned basis to determine whether they have degraded below National Electric Safety Code (NESC) design strength requirements with safety factors.

A third-party contractor inspects and tests all poles on a cycle meeting the interval recommended in RUS Bulletin 1730B-121. Circuits are identified, mapped, and scheduled for inspection and testing using latest industry standards and practices.

5.2.5 Substation Inspections

The Preventive Maintenance Plan provides for regular inspections of LCEC substations. Qualified personnel will use prudent care while performing inspections following all required safety rules to protect themselves, other workers, the general public, and the system's reliability.

The monthly substation inspection involves a thorough look at the system to confirm that there are no structural or mechanical deficiencies, hazards, or tree trimming requirements. Individual pieces of equipment and or structures receive careful visual examination and routine diagnostic tests as appropriate. Thermal imaging camera examination for hot spots to proactively catch poor connectivity eliminating operational concerns and possible fire hazards.

5.3 Vegetation Management (VM)

LCEC contracts out tree trimming. Due to a lack of vegetation in our area, tree trimming is conducted on a 5 year cycle. Trimming standards and clearance specifications are based off RUS specs. Inspections are conducted ounce contractors are complete with an area.

5.3.1 Vegetation to Conductor Clearance

LCEC will meet the minimum standards for conductor clearances from vegetation to provide safety for the public and utility workers, reasonable service continuity and fire prevention. As an

operator of electric supply facilities, LCEC's VM program will keep appropriate records to ensure that timely trimming is accomplished to maintain the designated clearances. These records will be made available for RUS O&M inspections upon request.

LCEC has an operational and management responsibility and is required by State and Federal Agencies to maintain the right of way, under or around its power lines. To lessen the liability of fire and safety hazard due to live, dead or leaning trees and vegetation, LCEC crews work on an ongoing effort to clear any such hazard by removing any tree or brush that are directly under the power line and considered a problem. Trees or vegetation that is outside of the power line but is encroaching inside the ROW shall be trimmed or removed as needed.

Patrols are scheduled to ensure all lines are inspected for vegetation hazards on a two-year timeline. The results of the patrols are targeted areas for vegetation pruning or removal.

During tree work, contractors aim to achieve a minimum standard clearance (Figure 5), unless otherwise directed by LCEC VM staff and all overhanging limbs are removed. The contractor also clears vegetation from LCEC's service drops and pole climbing space on an as needed basis.

The following are optimal clearance dimensions or trimming operations:

- minimum standard clearance under the neutrals
- minimum standard clearance for transmission line routes

5.3.2 Vegetation Trimming Standards

LCEC's contractors follow American National Standards Institute (ANSI) A300 concepts and utility directional pruning, which supports proper pruning/tree health while achieving and maximizing the pruning cycle. The VM program was developed with RUS, ANSI A300, ANSI C2, National Electrical Safety Code (NESC)[1], And FAC 003-4 standards in mind.

5.3.3 VM Trimming and Inspection Schedule

LCEC personnel and contractors perform annual, ground-based, or UAV inspections of tree conductor clearances and hazard tree identification for LCEC ROWs and easements. LCEC contracts full-time tree trimming crews for year-round vegetation management work. LCEC line crews also address vegetation concerns in response to service calls or field observations. Proactive maintenance during routine operations and prompt action during emergency events maintain system reliability, a safe work environment, and reduces fire danger. Any VM issues that cannot be immediately handled by the line crews are referred to the VM contractor for priority trimming. Scheduled patrols ensure all lines are inspected for vegetation hazards and systematically trimmed. On-going, year-round field patrols identify targeted areas for

[1] Rules 012,013 and 218

vegetation pruning or removal and ensure compliance with state and federal regulatory requirements.

5.3.4 Hazard Trees

A subset of Danger Trees[2], A Hazard Tree is defined as any tree or portion of a tree that is dead, rotten, decayed or diseased and which may fall into or onto the overhead lines or trees leaning toward transmission and distribution facilities. These trees are sometimes located beyond the easement or ROW. Any tree that is located outside of the ROW and is deemed a hazard tree will be cleared from all energized lines.

A hazard tree will have one or more of the following characteristics:

- Dead or dying - all dead or dying trees along, or outside the LCEC right-of-way may be removed depending on the height of tree and the direction of the lean.
- Leaning trees - trees that have such a lean toward the right-of-way that they cannot be trimmed without removing the tops and slanting the tree back. Removal depends on height and species of the tree and direction of the lean.

Large areas of the service area have been affected by bark beetle infestation, causing many trees in the service area to become hazard trees. No danger or hazard trees are cut or removed if it cannot make contact with the conductors or structures or cause adjacent trees to fall into the power lines.

5.3.5 Controlling Incompatible Vegetation

In addition to the annual patrols by LCEC field staff observing and reporting on incompatible uses and encroachments, LCEC make efforts to educate public and private landowners about incompatible vegetation that can pose risks if planted under or near conductors.

5.4 Fire Mitigation Construction

This section outlines any construction standards or designs in use to reduce the likelihood of an ignition including but not limited to:

- Steel poles
- Concrete poles
- Shorten spans
- Undergrounding of distribution lines
- High impedance fault detection
- Non-expulsion fuses
- Polymer crossarms

[2] As defined by ANSI 300 Part 7 standards

5.4.1 Avian Protection Program

All new 25KV construction now includes avian protection. Avian protection shall continue to be added to existing construction as it is requested or required due to bird migration.

5.5 Emerging Technologies

LCEC will continue to explore new technologies and best management practices. Future pilot projects will serve to evaluate the effectiveness of emerging technologies while controlling unwarranted expenditures on unproven methods. LCEC may elect to integrate these technologies or practices into its ongoing maintenance programs based on the outcomes. These technologies include, but are not limited to non-expulsion fuses, thermal imaging cameras, LCEC-owned weather stations, electronic reclosers, non-wood poles, and fire protective coatings for wood poles.

6 Emergency Response

6.1 Preparedness and Response Planning

Ancillary emergency planning documents may include:

- Emergency Preparedness Plan (EPP)
- Emergency Operations Plans (EOP)
- System Operations (SO)

6.1.1 Emergency Management Communication and Coordination

In response to active emergencies, LCEC coordinates and collaborates with the PUC in Texas and New Mexico Communications Authority in New Mexico as well as the local First Responders. During such emergencies, LCEC shall provide a utility representative to ensure effective communication and coordination.

6.1.2 Public Agency and Customer Communications for Outages

When LCEC has planned outages, communication is delivered to the public through a variety of means such as, but not limited to, home webpage, Facebook, Twitter, radio, and newsletter. Unplanned outages are communicated to the public with Facebook and Twitter. Unplanned outages, as required, are reported to NERC and if Texas is affected, the PUC of Texas is also notified.

LCEC will provide the following information to the public via Facebook and Twitter regarding fire awareness.

- Fire Season Preparation. Fire danger risk levels
- Notice to public of clearing of right aways
- How to mitigate fire dangers.

6.2 Restoration of Service

If an outside emergency management/emergency response agency requests a power shutdown, or if LCEC elects to de-energize segments of its system due to extreme weather, LCEC staff will patrol the affected portions of the system before the system can be re-energized. Suspect equipment or distribution lines that cannot immediately be patrolled will remain de-energized until LCEC staff (Director of Line Operations) can do so. Poles and structures damaged in a wildfire must be assessed and rebuilt as needed prior to re-energization. Periodic customer and media updates of restoration status prior to full restoration will be made when required.

6.2.1 Service Restoration Process

After a wide-spread outage, LCEC work crews take the following steps before restoring electrical service after a de-energization event. These measures intend to protect the worker, members, the public, and the system's reliability.

- **Patrol:** Crews patrol every de-energized line to ensure no hazards have affected the system during the outage. If an outage is due to wildfire or other natural disasters, as soon as it is deemed safe by the appropriate officials, crews inspect lines and equipment for damage, foreign contacts and estimate equipment needed for repair and restoration. Lines located in remote and rugged terrain with limited access may require additional time for inspection. LCEC personnel assist in clearing downed trees and limbs as needed.
- **Isolate:** Isolate the outage and restore power to areas not affected.
- **Repair:** After the initial assessment, LCEC staff meet to plan the needed work. Rebuilding commences as soon as the affected areas become safe. Repair plans prioritize substations and transmission facilities, then distribution circuits serving the most critical infrastructure needs. While the goal to reenergize all areas is as soon as possible, emergency services, medical facilities, and utilities receive first consideration when resources are limited. Additional crew and equipment are dispatched as necessary.
- **Restore:** Periodic customer and media updates of restoration status before full restoration are posted on social media platforms and LCEC's website. After repairs are made, power is restored to homes and businesses as quickly as possible. Members, local news, and other agencies receive notification of restored electric service. An LCEC qualified employee will oversee the restoration of the line.

7 Performance Metrics and Monitoring

7.1 Plan Accountability

Staff responsibility for plan implementation and general communications is described below:

- The Board of Directors makes policy decisions relative to the utility – they will be responsible for approving and adopting the Wildfire Mitigation Plan.
- The General Manager directs management staff responsible for operations, customer service and finance.
- The Manager of Engineering and Operations supervises the Director of Staking, Director of System Planning and Distribution Engineering, Director of Line Operations, Substation Foreman, Relay Technician and Meter Technician Foreman, etc.
- The Manager of Engineering and Operations is responsible for the overall execution the WMP. Staff will be directed as to their roles and responsibilities in support of the plan.
- The Manager of Marketing is responsible for communicating with public safety, media outlets, public agencies, first responders, local Office of Emergency Management, and health agencies during an emergency or planned maintenance outages.
- The General Manager determines when and how to notify outside agencies in cases of wildfire emergency events.
- LCEC's Manager of Commercial will be responsible for monitoring and auditing the targets specified in the WMP to confirm that the objectives of the WMP are met, as well as the implementation of the plan in general.

7.2 Monitoring and Auditing of the WMP

The WMP will be reviewed annually for the purpose of updating the plan as needed to reflect knowledge gained in the preceding year and modified accordingly. A more formal review will be done every 4 years in coordination with LCEC's business planning.

7.2.1 Identifying Deficiencies in the WMP

The Manager of Compliance will be responsible for ensuring that this WMP meets all public agency guidelines to mitigate the risk of its assets becoming the source or contributing factor of a wildfire. Staff responsible for assigned mitigation areas have the role of vetting current procedures and recommending changes or enhancements to build upon the strategies in the WMP. Either due to unforeseen circumstances, regulatory changes, emerging technologies or other rationales, deficiencies within the WMP will be sought out and reported to the Board of Directors in the form of an updated WMP on a 4-year basis.

The Manager of Engineering and Operations or their designee will be responsible for spearheading discussions on addressing any plan deficiencies and collaborating on solutions when updating the WMP. At any point in time when deficiencies are identified, the Supervisors or their delegates are responsible for making the appropriate policy adjustments. LCEC staff and qualified stakeholders are encouraged to bring any potential deficiencies to the attention of The Manager of Compliance, along with the appropriate staff, will evaluate each reported deficiency, and if determined to be valid, shall record the deficiency for further action.

7.3 Performance Metrics

Table 5. Performance Metrics

METRIC	RATIONAL	INDICATOR	MEASURE OF EFFECTIVENESS
Red Flag Warning (RFW) days in service area	Used to adjust annual variation in criteria	Number of RFWs during analysis cycle	N/A
Utility caused ignitions	Demonstrates the effectiveness of the plan	Count of events	Reduction or no material increase
Ignitions in "High" WHP tier (	Assess system hardening efforts in critical areas	Count of events	Reduction in the general trend of events
Power line down in "High" WHP tier* during fire season	Assess system hardening efforts in critical areas	Count of events	Reduction in the general trend of events
Faults in "High" WHP tier	Assess system hardening efforts in critical areas	Count of events	Reduction or no material increase
Vegetation-caused Outage during fire season	Assess VM program work schedules/QC process	Count of events	Reduction or no material increase
Vegetation-caused ignition	Assess VM program work schedules/QC process	Count of events	Reduction or no material increase
Bare line contact with vegetation	Assess VM program work schedules/QC process	Number of contacts recorded	Reduction or no material increase
Frequency of WF	Demonstrates the effectiveness of the plan	Count/time span	Reduction or maintained w/ in acceptable parameters

Duration of WF	Demonstrates the effectiveness of the plan	Average time to extinguish	Reduction or maintained w/ in acceptable parameters
Damage Area	Demonstrates the effectiveness of the plan	Cumulative Assessed Ft^2	Reduction or maintained w/ in acceptable parameters
Total Damage Cost	Demonstrates the effectiveness of the plan	Cumulative Assessed Cost	Reduction or maintained w/ in acceptable parameters

7.4 Programmatic QA/QC processes

7.4.1 Transmission and Distribution System Inspection QC Process

In house inspections of all contracted work is performed before invoices are signed.

7.4.2 Vegetation Management QC Process

In house inspections of all contracted work is performed before invoices are signed.

7.5 Plan Approval Process

7.5.1 Board Presentation

The Manager of Compliance will present the Wildfire Mitigation Plan to the General Manager, who will then present to LCEC's Board of Directors for approval and adoption of the plan.

Appendix A: Plan and Mapping Disclaimers

WILDFIRE MITIGATION PLAN DISCLAIMER

The information provided in this report was developed by LCEC's staff and is intended for LCEC's internal planning purposes only. LCEC does not warrant the accuracy, reliability, or timeliness of any information in this report, and assumes no liability for any errors, omissions, or inaccuracies in the information provided. LCEC shall not be held liable for losses caused by using this information. Portions of the data may not reflect current conditions. Any person or entity who relies on any information obtained from this report, does so at their own risk. This report is presented solely for internal use AS-IS by LCEC staff. LCEC make no representations or guarantees expressed or implied regarding the accuracy or completeness of the report.

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LEA COUNTY ELECTRIC COOPERATIVE

VEGETATION MANAGEMENT PLAN

OCTOBER 2023

PURPOSE

The purpose of this Vegetation Management Policy and Procedure (VMPP) is to outline Lea County Electric Cooperative (LCEC) vegetation management program in accordance with applicable industry standards and regulations. Recommendations governing maintenance include ANSI A300 Part 1-1001; A300 Part 7-2006; ANSI Z133; ANSI 2006; OSHA (29 CFR 1910.269); NESC 2007; (RUS (USDA 7 CFR Part 1730); IWUIC 2012 Section A102. United States

ACCOUNTABILITY

LCEC manages approximately 3,957 miles of power line rights-of- way (ROW) within the counties of Chaves, Eddy, and Lea Counties in New Mexico. Cochran, Gaines, and Yoakum Counties in Texas.

POLICY

The primary objective of LCEC VMPP is to provide safe, reliable, and economical delivery of electric energy to the public with ready access for facility maintenance or emergency repairs. LCEC follows all guidelines governing agency.

We accomplish these objectives by adopting an integrated vegetation management (IVM) strategy using best practice techniques to encourage stable, early successional plant communities that provide multiple benefits by controlling plants not compatible with our goals. LCEC uses a variety of methods to manage vegetation including manual, mechanical, and cultural techniques such as hand cutting, tree pruning, and tree removal.

PROCEDURES

1. Transformer yards, Pole yards, and Substations

Personnel and customer safety and area aesthetics are primary vegetative concerns around facilities used for offices and substations.

a. Landscaping

Where landscaping is necessary, native plants shall be used to provide aesthetics and habitat for native pollinators and wildlife. Non-native invasive plants shall be controlled where possible using chemical and biological controls.

b. Stoned Areas

Working area inside fences and around substation-energized equipment shall be stoned and treated annually with pre-emergent herbicides to prevent growth of vegetation that poses an electrical hazard.

2. Transmission ROW

LCEC receives generated power that we transmit at 69,000 and 115,000 volts (69, 115kV) of electricity across our territory to provide energy transformed at substations to serve business and residential members. The 69, 115kV ROW corridor is maintained at a minimum fifty (50) foot width.

3. Distribution ROW

LCEC delivers power along its transmission conductors to substations where it is transformed to lower voltages for distribution to business and residential members. Distribution conductors range from single phase (7.2kV) to 3-phase (14.4kV) and are centered within a ROW corridor maintained at a minimum thirty (30) foot width.

4. ROW vegetation work is determined and planned by LCEC using an integrated vegetation management (IVM) strategy incorporating specific steps:

- Site inspection to determine the size, density, and species of the incompatible plants
- Determining thresholds for when action is needed
- Choosing control options best suited to the target plants in the area being managed and surrounding land concerns
- Communicating the planned action to both internal and external customers
- Implementing the controls at the most appropriate time
- Performing quality assurance through the inspection program that the results achieve the goals
- Determining the next action threshold and beginning the process again

5. The LCEC IVM is applied according to the vegetation management needs specific to the ROW facilities being managed; based on voltage, construction type, ROW width, vegetative type and height, location in the ROW, adjoining land usage, environmental sensitivities, and resources.

a. **Planning**

- LCEC develops transmission vegetation management plans based on conditions found during ground inspections by our employees/or contractors. The annual plan supports the IVM strategy of developing compatible plant communities using control options and timing according to the conditions found.
- LCEC develops distribution vegetation plans for 3-phase or single-phase lines based on conditions found during ground inspections by our employees/or contractors, and the reliability report from Engineering, once every (3-5) years or sooner if warranted by storm or wildfire events. These plans are updated as necessary to support the IVM strategy of developing compatible plant communities using control options and timing according to the conditions found.

- Unplanned tree work that is requested by members shall be evaluated by LCEC and performed on scheduled maintenance unless the employee or contractor evaluation shows the work can immediately improve the circuit's electric reliability.

b. **Removal of Brush and Trees**

- LCEC manages vegetation to be compatible with operational needs by removing tall growing tree species and interfering and invasive shrubs from the ROW to allow growth of native grasses, herbaceous plants, and small shrubs.
- An exception may be made to allow tended fruit trees to remain in transmission ROW if the owner keeps the trees pruned to not exceed ten (10) feet in height.
- LCEC shall work with property owners to systematically remove tree species that are fast growing or most prone to branch failure during storm events of high wind, rain, snow, or ice.
- Target plants removed shall be cut leaving a stump at a height of six (6) inches, or as close to the ground or attached fencing as possible.
- Multi-stemmed trees and brush at the ROW boundary should be completely removed rather than splitting stems, to provide better aesthetics, and line of sight if along roadsides.
- Slash from cutting shall be scattered or removed from the ROW.
- Control of the target trees and invasive shrubs allows early successional native grasses and forbs to germinate. These grasses and herbaceous plants provide food and cover for birds and mammals, nectar and pollen for native bees, honeybees, butterflies, and other pollinators.
- Shrubs and small oak trees shall be cleared to a ten (10) foot radius around electric poles to allow unimpeded access for line crews. Outside these cleared areas they may remain in the ROW in scattered groups not to exceed ten (10) feet in height, to provide food and nesting for songbirds.
- Early successional plants control the incompatible plants by competing for sunlight, water, and nutrients. Many of these plants also produce their own herbicides (allelopathic chemicals) to restrict growth of competing plants. These actions and the feeding by birds and small mammals on seeds and seedlings, provide biological controls that reduce the need for further intervention.
- The extent of necessary interventions diminishes over time as grasses, herbaceous plants and shrubs provide an increasingly stable, low growing plant community. This compatible plant community allows our ROW to act as wildlife and pollinator greenways, provides a stable cover for watershed protection, and provides a defensible space for wildfire access and suppression.

c. **Tree Pruning (Trimming)**

- Pruning shall be performed using the lateral, or natural, pruning technique of cutting interfering branches back to a larger branch or trunk growing laterally away from the electric facilities. This mimics how trees self-prune branches in a forest and reduces the number and growth of branches sprouting toward conductors.
- The placement of pruning cuts shall be determined by the tree species growth patterns and branch positions but should be made at or beyond the ROW boundary to prevent growth near energized conductors.

- Trees growing adjacent to the ROW shall have interfering branches pruned from ground to sky where possible, with a minimum of fifteen feet (15') clearance above conductors.
- Trees growing directly under power lines shall be cut back to a fork; a natural junction that allows growth to either side of the facilities.
- Tree trimming will be performed by a Lineman or contractor who have been trained in tree trimming and pruning.

d. **Off-ROW Danger Trees**

- LCEC manages trees in the area adjacent to the ROW, termed Danger Tree Zone, where off-ROW tall- growing dead, dying, diseased or leaning trees may pose a grow-in or fall-in threat to conductors.
- These danger trees shall be evaluated for safety and if found to be a hazard, the property owner shall be notified of the need for action and the hazard tree removed or pruned to a height below the conductors and allowed to remain as a wildlife roosting tree. Imminent threats shall be eliminated immediately with notification of property owners afterwards.

Vegetation Management of Archaeological Sites

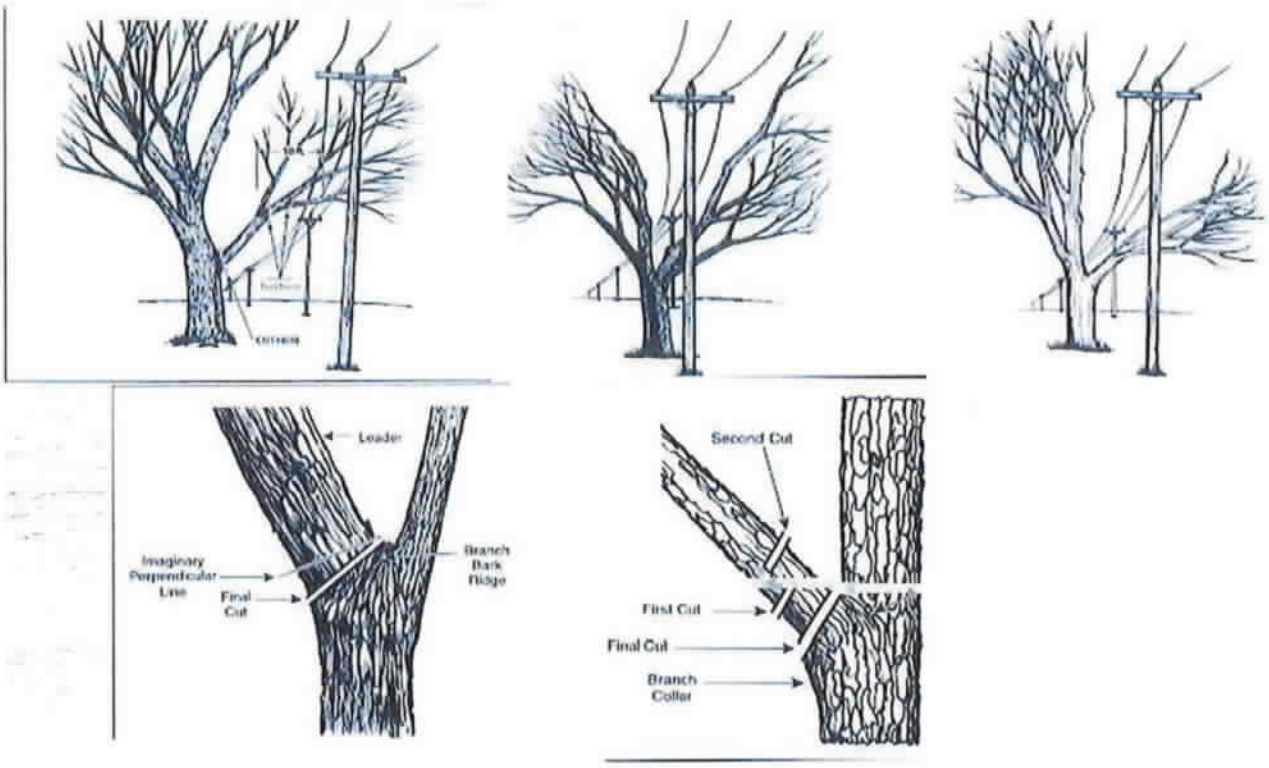
- When vegetation clearing is required on federal, state, or tribal known archaeological sites, or if new sites are discovered, LCEC shall consult with the appropriate agency and a qualified archaeologist prior to commencing work, unless the work is an emergency.

Vegetation Management Adjoining Highways

- LCEC electric ROW corridors sometimes run parallel to or cross perpendicular of state highways. We recognize the vegetation management needs of highway safety for sight distance, wildlife collisions and traveler aesthetics; and their goal of improving habitat for butterflies, bees, and other pollinators under the Federal Strategy for Pollinators.
- Our IVM best practice techniques of developing native low growing plant communities on our ROW supports highway pollinator and aesthetic management objectives. Similarly, low growing shrubs and small stature trees developed at road crossings provide aesthetics for travelers without jeopardizing electric reliability or highway travel safety.
- Annual Vegetation Work Plans
- LCEC will develop annual work plans based on the results of their inspections and circuit reliability, with modifications as warranted by changing conditions. Reasons for modifications may include, but are not limited to:
    - Availability of contract crews
    - Unanticipated high priority work
    - Environmental changes such as weather conditions, accessibility, fire
    - Delays in obtaining permits, landowner changes or permission
    - Archaeological findings
    - Construction changes within or adjacent to ROW
    - Circumstances beyond LCEC control

- Necessary vegetation work is scheduled with time allot ted for obtaining private landowner notification or permission, permits, and other regulatory requirements.
- LCEC or contractor shall notify contact numbers for tree trimming and System Operations prior to work commencement to coordinate with line crew operations and landowner communication.
- Attempt of absent landowner notification shall be by door hanger, postcard, or another form of communication.
- Vegetation work may be segmented and worked according to its various components; tree pruning, tree removal, brush clearing, and herbicide treatment, as directed by LCEC.
- Vegetation contractors are viewed by landowners as representatives of LCEC, and as such shall maintain themselves and their equipment in a safe, clean, and appropriate fashion.
- The line clearance crew shall make a courtesy notification of landowners prior to commencing work and foremen shall be fluent in English or be bilingual.
- Line clearance crews shall be properly equipped and trained to complete the work safely and efficiently as planned.
- Line clearance crews shall understand the dangers posed by cutting equipment and vehicles for producing sparks or heat and be adequately trained and equipped to assist in suppression of wildfire.
- Work shall proceed in an orderly fashion from the circuit's substation energy source or OCR, with the main 3-phase conductors being worked and completed before proceeding to single phase.
- Landowner complaints or refusals for vegetation work shall be immediately handled by the contractor or LCEC and communicated to System Operations.
- Line clearance shall cease work upon discovering archaeological artifacts on their work site until cleared to continue work or moved to an alternate location.
- Work sites shall be kept neat without trash, and debris disposed of properly.
- As line clearance crew complete scheduled circuit vegetation work, advancement to the next scheduled circuit shall not proceed until after work has been approved and or until the line clearance crew has remedied any unsatisfactory findings.
- Line clearance crew shall immediately notify the Line crew of any unsafe or hazardous conditions (sagging conductors, loose guy wires, broken cross arms).

Tree Pruning to ANSI Stand



PROJECT NO. 53385

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

2023 ANNUAL REVIEW STATEMENT FOR THE EMERGENCY OPERATIONS PLAN OF LEA COUNTY ELECTRIC COOPERATIVE, INC.

Lea County Electric Cooperative, Inc. submits this 2023 Annual Review Statement in compliance with 16 Tex. Admin. Code §25.53 (c)(3)(B) for an entity that did not make a change to its EOP that materially affects how the entity would respond to an emergency.

NO CHANGES TO LIST OF PRIMARY/BACKUP EMERGENCY CONTACTS

Pursuant to §25.53 (c)(3)(B)(i) requiring the entry of a pleading that documents any changes to the list of emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency, **Lea County Electric Cooperative, Inc.** hereby confirm that no changes have been made to the List of Primary/Backup Emergency Contacts previously submitted under the *Emergency Operations Plan, and Affidavits* filed in this docket on May 24, 2022, Item 584.

ATTESTATION AND AFFIDAVIT

In accordance with §25.53 (c)(3)(B)(iii), an Affidavit from Lea County Electric Cooperative's highest-ranking representative, official, or officer with binding authority over, as described under Lea County Electric Cooperative §25.53 (c)(4)(C) is attached hereto as ATTACHMENT A

In accordance with §25.53 (c)(3)(B)(ii), an Attestation from Lea County Electric Cooperative's highest-ranking representative, official, or officer with binding authority over Lea County Electric Cooperative stating that there have been no changes made to the *Emergency Operations Plan, and Affidavits* (filed in this docket on May 24, 2022, Item 584) that materially affects how the entity would respond to an emergency is included as Item 4 of ATTACHMENT A.

Respectfully submitted,

Bobby Ferris
Executive Vice President,
General Manager
1300 W Avenue D
Lovington, NM 88260
(575) 396-3631
bferris@lcecnet.com

ATTACHMENT A

AFFIDAVIT AND ATTESTATION OF BOBBY FERRIS

STATE OF NEW MEXICO	§
	§
COUNTY OF LEA	§

BEFORE ME, the undersigned authority, on this day personally appeared Bobby Ferris, who being duly sworn deposed and stated as follows:

1. My name is Bobby Ferris. My business address is 1300 W Avenue D, Lovington, New Mexico, 88260. I am over eighteen (18) years of age. I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.

2. I am currently employed as the Executive Vice President, General Manager of Lea County Electric Cooperative, Inc (LCEC). I am authorized to make this affidavit on behalf of LCEC as its Executive President, General Manager.

3. LCEC filed the Executive Summary and redacted Emergency Operations Plan (EOP) on May 24, 2022, in Project No. 53385, Item 584. On the same day, it submitted the required non-redacted EOP to the Public Utility Commission of Texas.

4. I hereby attest that no changes were made to the EOP that materially affect how LCEC would respond to an emergency.

5. On behalf of LCEC, I affirm the following:

   All relevant operating personnel responsible for the critical operation of LCEC are familiar with, and have received training, on the applicable contents and execution of the EOP and are committed to following the plans and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.

6. The EOP has been reviewed and approved by the appropriate executives.

7. LCEC will comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule, subsection (f). In 2022, drills were conducted, and LCEC activated emergency procedures for a winter storm. For 2023, drills are currently planned. LCEC will comply with the requirement to provide notification 30 days prior to a drill.

8. The EOP or a summary will be distributed to local jurisdictions if deemed necessary.

9. LCEC maintains business continuity plans that cover our corporate functions and retail operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.

10. All relevant emergency management personnel who are designated to interact with emergency management officials during emergency events have completed the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training.

Bobby Ferris
Executive Vice President, General Manager
Lea County Electric Cooperative

Subscribed and sworn to before me this 28th day of March 2023.

Notary Public

My commission expires: 3/28/2023

Commission No.: #1029162

ALMA GRIFFIN
Notary Public - State of New Mexico
Commission # 1029162
My Comm. Expires Mar 28, 2023