



Filing Receipt

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Control Number - 53385

Item Number - 1642

December 1, 2023

Public Utility Commission
Central Records
1701 N. Congress Ave, Ste. 8- 100
Austin, Texas 78701

Re: Project 53385 – Ben Milam Solar 1 LLC Emergency Operations Plan for the Orion 1 Facility

To whom it may concern:

Pursuant to 16 Texas Administrative Code (“TAC”) § 25.53(c), Ben Milam Solar 1 LLC (“Ben Milam 1”) hereby submits the following in connection with the emergency operations plan (“EOP”) requirement for its Orion 1 Solar Facility (“Orion 1”):

1. An EOP Executive Summary, including:
 - A description of the contents and policies contained in the Ben Milam 1 EOP;
 - A reference to specific sections and page numbers in the Ben Milam 1 EOP, corresponding to each of the EOP requirements in 16 TAC § 25.53;
 - A record of distribution in table format, which will be updated prior to Orion 1’s commercial operation; and
 - An affidavit signed by Ben Milam 1’s highest-ranking representative prior to the facility’s commercial operation, which will be updated to contain the affirmations required in 16 TAC § 25.53(c)(4)(C) upon commercial operation.
2. A complete copy of the complete EOP, redacted to remove confidential portions.

Ben Milam 1 provides its emergency contact information confidentially.

Orion 1 is still under construction with an anticipated commercial operation in Q2 2023. As Orion 1 approaches commercial operations, Ben Milam 1 will update and revise the EOP Executive Summary, the Record of Distribution, the Affidavit, and the EOP and submit those updates to the Public Utility Commission of Texas (“Commission”) and the Electric Reliability Council of Texas (“ERCOT”) as appropriate (*see* 16 TAC §25.53(c)(3)).

In accordance with 16 TAC §25.53(c), the unredacted Ben Milam 1 EOP will be submitted to ERCOT no later than ten days after the Commission approves Ben Milam 1’s Power Generation Company registration application, which is being filed simultaneously with this filing. The unredacted EOP is considered ERCOT Critical Energy Infrastructure Information (ERCOT Nodal Protocols, Section 1.3.2.1, Items Considered ERCOT Critical Energy Infrastructure Information (Jan. 27, 2023)) and contains Ben Milam Solar 1’s proprietary, confidential, and security-sensitive information related to the facility’s operations and responses to emergencies. As such, the unreacted EOP filed with ERCOT must be designated as Protected Information under the ERCOT Protocols (16 TAC §25.53(c)(1)(C)).

For questions regarding this filing, please contact regulatory@sbcenergy.com.

Respectfully submitted,

/s/ Luisa F. Elkins
Luisa F. Elkins
Director of Compliance and Regulatory Counsel
Ben Milam Solar 1 LLC

Non-Market Solar LLC	
POLICY NAME	Emergency Operations Plan
EFFECTIVE DATE	[Date of NERC Registration]
VERSION NO.	1.0

BEN MILAM SOLAR 1 LLC EMERGENCY OPERATIONS PLAN | TABLE OF CONTENTS

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1.0 EXECUTIVE SUMMARY

1.1 Facility Information

Ben Milam Solar 1 LLC (Orion I) is a Solar facility located in Milam County, Texas with total nameplate capacity of 200 MWac. The Facility is due to commence commercial operations in Q2 of 2024 and is interconnected to ERCOT at the 345 kV substation located in TRE footprint. This Plan will become effective upon COD declaration/NERC Registration.

1.2 Public Utility Commission of Texas

This Plan provides guidance and direction to Ben Milam Solar 1 LLC Orion I regarding compliance with the emergency operations requirements for power generation companies (PGC) under Chapter 25 of the Public Utility Commission of Texas (PUCT) Electric Substantive Rules. Orion I maintains separate Winter and Summer Weatherization Plans that help meet compliance with the severely hot and severely cold weather planning required by the PUCT.

This Plan does not manage nor address Emergency Preparedness and Operations (EOP) processes relating to NERC standard requirements (such as EOP-004 and EOP-005). NERC related EOP processes are addressed in separate documents.

1.3 Occupational Safety and Health Administration

This Plan additionally ensures compliance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.38 (Emergency Action Plans). Orion I acknowledges awareness that any significant changes in types or quantities of chemicals or other hazards on the site will necessitate review of this plan. Any such revisions to this plan will be communicated with appropriate agencies and organizations.

Beyond compliance with the rules noted above, Orion I recognizes that proper planning for emergency operations is critical to provide a coordinated response that protects life, property, and the environment.

1.4 Primary and Backup Emergency Contacts

The below individuals are the primary and backup emergency contacts for Orion I who can immediately address urgent requests and questions from the PUCT during an emergency.

Emergency Coordinators			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

1.5 TAC §25.53 Requirements Reference

TAC §25.53 Reference	Requirement	Page	EOP Reference
(c)(1)(A)(i)(I)	Executive Summary – Policies and Contents	3	Section 1.0
(c)(1)(A)(i)(II)	Executive Summary – Requirements Reference	4	Section 1.5
(c)(4)(A)	Executive Summary – Record of Distribution	5	Section 1.6
(c)(4)(B)	Primary and Backup Emergency Contacts	3	Section 1.4
(c)(4)(C)	Executive Summary - Affidavit	6	Section 1.7
(d)(1)	Approval and Implementation Section	11	Section 3.0
(d)(2)	Communication Plan	12	Section 4.0
(d)(3)	Emergency Response Supplies	13	Section 5.0
(d)(4)	Emergency Staffing	13	Section 6.0
(d)(5)	Weather Hazard Identification and EOP Activation	14	Section 9.0
(e)(2)(A)(i)	Weather Emergency Annex - Operational Plan for Hot/Cold Emergency	21	Weather Emergency Annex
(e)(2)(A)(ii)	Weather Emergency Annex - Fuel Switching Equipment Verification		N/A
(e)(2)(A)(iii)	Weather Emergency Annex - Checklist for Supplies and Personnel	22	Weather Emergency Annex
(e)(2)(B)	Water Shortage Annex		N/A
(e)(2)(C)	Restoration of Service Annex	22	Restoration of Service Annex
(e)(2)(D)	Pandemic and Epidemic Annex	22	Pandemic and Epidemic Annex
(e)(2)(E)	Hurricane Annex	23	Not within a TDEM Hurricane Evacuation Study Area
(e)(2)(F)	Cybersecurity Annex	27	Cybersecurity Annex
(e)(2)(G)	Physical Security Annex	28	Physical Security Annex
(e)(2)(H)	Additional Annexes		Not required
(f)	Drill Administration	13	7.0

1.6 Record of Distribution

Below is a record of all Orion I Personnel with access to the Emergency Operations Plan. All personnel were given access on the date of the EOP filing. All personnel will be trained on this EOP when the plan is initially implemented, when any revisions are made, and by the start of each Summer Season:

Name	Company	Role	Date Trained
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	

1.7 TAC §25.53 Affidavit

AFFIDAVIT

STATE OF CA §

COUNTY OF San Mateo §

Before me, the undersigned notary public, on this day personally appeared Abhijeet Sathe, 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 Abhijeet Sathe. I am over the age of eighteen and am a resident of California. 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 Ben Milam Solar 1 LLC.

2. I am the highest-ranking representative, official, or officer with binding authority over Ben Milam Solar 1 LLC and affirm the following.

- Prior to operations, relevant operating personnel will be familiar with and will have received training on the applicable contents and execution of the EOP, and such personnel will be 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;
- Ben Milam Solar 1 LLC will conduct a drill consistent with subsection (f) of 16 Texas Administrative Code § 25.53 and will provide notice to the Commission at least 30 days before that drill is conducted;
- Prior to operations, the EOP or an appropriate summary will be distributed to local jurisdictions as needed;
- Ben Milam Solar 1 LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- Ben Milam Solar 1 LLC has emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events who have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

3. I further 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.



Abhijeet Sathe
Co-President
Ben Milam Solar 1 LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 21st day of November, 2023.

CALIFORNIA JURAT

GOVERNMENT CODE § 6202

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of San Mateo

Subscribed and sworn to (or affirmed) before me on

this 29th day of November, 2023, by
Date Month Year

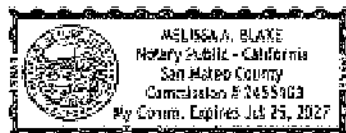
(1) Abigail S. Smith

(and (2) _____),
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature M. Blake
Signature of Notary Public

Place Notary Seal and/or Stamp Above



OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

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2.0 ROLES AND RESPONSIBILITIES

This EOP applies to Orion I described in Section 1.1 of the EOP. This Section describes the responsibilities and activities required of various parties in preparation for an emergency. Orion I understands that corporate and facility management, with critical execution and support from SOLV Energy, LLC (SOLV), will play an important role in maintaining effective emergency operations plan at the Facility. It is the responsibility of all personnel to exercise good judgment in the performance of this plan.

2.1 Orion I Personnel

2.1.1 [REDACTED]

2.1.2 [REDACTED]

2.2 Orion I Generator Owner Compliance Manager

2.2.1 [REDACTED]

2.2.2 [REDACTED]

2.3 Orion I Generator Operator Compliance Manager

2.3.1 [REDACTED]

2.3.2 [REDACTED]

2.4 SOLV Operations Control Center Manager

2.4.1 [REDACTED]

2.4.2 [REDACTED]

2.5 FACILITY LEAD

2.5.1 [REDACTED]

2.5.2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

2.6 SOLV Field Technicians

2.6.1 [REDACTED]

2.6.2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

e. [REDACTED]

[REDACTED]

2.7 Asset Management

2.7.1 [REDACTED]

2.7.2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2.8 Asset Owner

2.8.1 [REDACTED]

2.8.2 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.0 APPROVAL, IMPLEMENTATION, AND CONTINUAL IMPROVEMENT

3.1 Introduction and Applicability

This Plan provides guidance and direction to Orion I regarding compliance with the emergency operations requirements for power generation companies (PGC) under Chapter 25 of the Public Utility Commission of Texas (PUCT) Electric Substantive Rules and covers all in-scope Subchapter C Infrastructure and Reliability requirements. Orion I maintains separate Winter and Summer Weatherization Plans that help meet compliance with the severely hot and severely cold weather planning required by the PUCT.

This Plan does not manage nor address Emergency Preparedness and Operations (EOP) processes relating to NERC standard requirements (such as EOP-004 and EOP-005).

3.2 Revision Control

Change control for the Plan is managed and owned [REDACTED]
[REDACTED] A summary of revisions and individuals responsible for maintaining, implementing, and changing the plan is listed below.

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1.0	[REDACTED]	11/29/2023	New procedure	[REDACTED]

Version 1.0 of this EOP was approved on 11/29/2023

Version 1.0 of this EOP supersedes all previous EOPs as of 11/29/2023

3.3 Continual Improvement

In addition to periodic training, this plan will be reviewed and revised to ensure constant improvement addressing regional and operational changes in conditions and lessons learned.

Annual Compliance Review and Report

Annually, the compliance staff will perform a detailed review and confirmation that the facility personnel are following this procedure and identify areas for improvement.

Annual Improvement Plan

As part of the Annual Compliance Review, the compliance staff will develop an Annual Improvement Plan for the following year that will address any areas of concern as well as integrate new industry Best Practices to the procedure.

4.0 COMMUNICATION PLAN

4.1 Media

[REDACTED]

4.2 Public Utility Commission

The Public Utility Commission has access to the confidential contact information of the EOP, as well as any contact information publicly filed. Requests from the Public Utility Commission will depend on the context. If the Primary or Backup Emergency Coordinator is contacted by the Public Utility Commission staff related to an emergency event, request their name, title, and phone number, and answer all questions to the best of your ability. Provide any additional contact information including referrals to other emergency response stakeholders.

If a member of the Public Utility Commission staff wishes to discuss the content of this EOP or has other regulatory compliance related questions, direct the Public Utility Commission staff to the Asset Manager. Provide the contact information of the Asset Manager if necessary.

4.3 Office of Public Utility Counsel (OPUC)

The OPUC may have access to the confidential contacts of the EOP. If the Primary or Backup Emergency Coordinator is contacted by OPUC staff, refer the caller to the Asset Manager.

4.4 Fuel Suppliers

The Facility is not dependent on fuel suppliers to operate; accordingly, this portion of the Communications Plan required by 16 TAC Sec. 25.53 is inapplicable to Orion I.

4.5 Local and State Government Entities, Officials, and Emergency Operations Centers

The Facility Lead Technician and the SOLV Field technicians should work directly with local emergency responders including fire, police, or emergency medical services to coordinate services on site.

Any contact from a local government official, such as a city manager, council member, city engineer, or mayor shall refer the communication to Orion I Generator Operator Compliance Manager, who will coordinate with Orion I Generator Owner Compliance Manager and the Asset Manager for responses.

Requests for coordination with any emergency operations center, such as the Texas Division of Emergency Management (TDEM), shall be referred to Orion I Generator Operator Compliance Manager, who will coordinate with Orion I Generator Owner Compliance Manager and the Asset Manager for responses.

4.6 Reliability Coordinator

[REDACTED]

5.0 PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES

Orion I keeps the following pre-identified emergency supply inventory onsite. This inventory checklist is confirmed annually and before each winter and summer season.

Summer Item(s)	Quantity	Notes
Tarps	4	
Battery-powered radio with NOAA weather alert tone	1	
Extension cords	4	
Flashlights and batteries	3	
Portable generator	1	Backup generator on site (non-portable)
Verify adequate fuel reserves both for backup generator and for ATV/Vehicle fuel	5	(5) 5-gallon gas cans. Backup generator runs on propane. Tank is 500 gallons and is 90% full.
Hot weather gear that is compatible with PPE (e.g., fire-resistant clothing that breathes, cooling bandanas, sunscreen, personal hydration) ¹	3	All techs have cool weather FR clothing, ice and water on site as well.
Fully stocked First Aid kits	6	Trucks, office control room and shop
Verify adequate inventory of spare parts for reliable operation of the plant during summer season		Parts are still pending from EPC and power electronics
Winter Item(s)	Quantity	Notes
Tarps	4	
Blankets	4	
Battery-powered NOAA weather radio with tone alert	1	Inside office
Extension cords	4	
Flashlights, extra batteries	3	
Fully stocked First Aid Kits	6	Trucks, office control room and shop
Verify adequate inventory of spare parts needed for reliable operation during winter weather		Parts are still pending from EPC and power electronics

6.0 EMERGENCY STAFFING PLAN

¹ Consult with Safety department on specific gear required.

[REDACTED]

7.0 TRAINING

All personnel at the facility shall receive training on this Emergency Operations Plan whenever it is modified or on at least an annual basis. Personnel will also be trained when this plan is initially implemented. Contractors and visitors who enter operating areas of the facility will be trained on plant alarms, muster locations, and evacuation procedures before site orientation for the first time, and at least annually thereafter.

7.1 Annual Drill

[REDACTED]

7.2 Drill Requirements

[REDACTED]

8.0 FACILITY EMERGENCY CONTACTS

Orion I Emergency Coordinator is responsible for specific actions detailed in this plan (as noted). Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

EMERGENCY CONTACTS
9-1-1
State of Emergency Services:
Hazardous Material Spills (State): 800-832-8224
Weather Warning Center: https://www.weather.gov/
Poison Control: (800) 222-1222

Non-Emergency Contacts	Phone:
County Sheriff (use Police Dept. for emergencies)	254-697-7033
State Environmental Agency	512-239-1000
National Response Center (NRC)	800-424-8802
Regional Water Resources Board	254-501-9243
OSHA	512-374-0271
Fish & Game, Environmental Division	512-389-1112
Police Department	254-583-7919
Fire Department	254-869-2121

9.0 WEATHER HAZARD IDENTIFICATION AND EOP ACTIVATION PROCEDURE

Orion I will identify weather related hazards such as tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding through the National Weather Service alert system.

[REDACTED]

10.0 PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders. To prepare facility personnel for such contingencies, it will be the facility policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation).

Note: Severe weather condition-related injuries are covered in the appropriate Plan.

Basic First Response Actions

- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
- If the person is unresponsive, immediately call 911 for outside medical assistance. Other personnel should assist with 911 notifications.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions should be commenced.
- If CPR is being performed, CPR should be continued until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, do not attempt to move the victim. Make the victim as comfortable as possible and

apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.

- Immobilize all injured parts of the victim.
- Prepare victim for transportation, if the victim can be safely moved

Physical Shock

Symptoms

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

Electric Shock

Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

Treatment

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR.

Burns

Symptoms

- Deep red color; or
- Blisters; or
- Exposed flesh.

Treatment

- Cooled immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

11.0 FIRE RESPONSE PLAN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12.0 CHEMICAL OR OIL SPILLS AND RELEASES

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ANNEXES

WEATHER EMERGENCY ANNEX

Severe weather can negatively impact the Facility. Events and disturbances that can occur in and around the facility include, but are not limited to, windstorms, severe thunderstorms, flooding, tornadoes, hurricanes, excessive heat or cold, snowstorms, and ice storms. These weather events can be detrimental to the employees and or equipment and structures at the facility.

Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization plans to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those plans.

Temperature Design Parameters

[REDACTED]

Event Identification

[REDACTED]

Operational Plan for Cold Weather Emergency

[REDACTED]

PRE-WINTER CHECKLIST

[REDACTED]			
[REDACTED]			
T	[REDACTED]	T	[REDACTED]
I	[REDACTED]		
I	[REDACTED]		

■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		

Training Plan for Winter Weather

All relevant op personnel will be trained on the summer weather preparations and operations by December 1 of each year.

Operational Plan for Hot Weather Emergency

Orion I Summer Weatherization Plan includes Appendices for both seasonal readiness in accordance with §25.53, and pre-event checklists in accordance with §25.55. Orion I Personnel will use the Pre-Event Appendix when the Weather Emergency – Hot Weather Emergency is activated. Also included are Appendices related to emergency supplies and post-season lessons learned.

The Pre-event Checklist to be used upon activation of the EOP is incorporated into the Summer Weatherization Plan is repeated below for compliance purposes:

PRE-SUMMER CHECKLIST/HOT WEATHER PREPAREDNESS CHECKLIST

[REDACTED]			
[REDACTED]			
[REDACTED]			
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		

■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	

Training Plan for Summer Weather

All relevant op personnel will be trained on the summer weather preparations and operations by June 1 of each year.

Personnel Safety

[REDACTED]

Verification of the Adequacy and Operability of Fuel Switching Equipment

This component of the Weather Emergency Annex is not relevant to Orion I because it does not have fuel switching equipment installed.

WATER SHORTAGE ANNEX

Sufficient water is kept onsite for staff consumption and housekeeping. The Facility does not require process water to operate.

RESTORATION OF SERVICE ANNEX

[REDACTED]

PANDEMIC AND EPIDEMIC ANNEX

Procedures related to management of a pandemic or epidemic primarily affect Orion I Personnel present on site. Procedures to prevent the spread of illness amongst staff physically located on site are tailored to the known transmission mechanisms of the disease. [REDACTED]

[REDACTED]

HURRICANE ANNEX

Hurricanes, tropical storms, and other severe weather is monitored by Orion I personnel through multiple outlets. [REDACTED]

[REDACTED]

Evacuation

[REDACTED]

Immediate Site Evacuation

[REDACTED]

Delayed Site Evacuation

[REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Number of years in a relationship	Percentage of respondents
1-2 years	10%
3-4 years	15%
5-6 years	12%
7-8 years	18%
9-10 years	14%
11-12 years	16%
13-14 years	13%
15-16 years	17%
17-18 years	11%
19-20 years	19%
21-22 years	15%
23-24 years	12%
25-26 years	14%
27-28 years	10%
29-30 years	16%
31-32 years	13%
33-34 years	17%
35-36 years	11%
37-38 years	18%
39-40 years	14%
41-42 years	16%
43-44 years	12%
45-46 years	15%
47-48 years	10%
49-50 years	17%
51-52 years	13%
53-54 years	16%
55-56 years	11%
57-58 years	18%
59-60 years	14%
61-62 years	16%
63-64 years	12%
65-66 years	15%
67-68 years	10%
69-70 years	17%
71-72 years	13%
73-74 years	16%
75-76 years	11%
77-78 years	18%
79-80 years	14%
81-82 years	16%
83-84 years	12%
85-86 years	15%
87-88 years	10%
89-90 years	17%
91-92 years	13%
93-94 years	16%
95-96 years	11%
97-98 years	18%
99-100 years	14%

[REDACTED]
 [REDACTED]
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 [REDACTED]

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<div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; height: 20px; width: 100%;"></div>

CYBERSECURITY ANNEX

[REDACTED]

APPROVALS

Title	Approval