



Foard City Wind, LLC Pandemic and Epidemic Annex
Communicable Disease Prevention Plan

(Innergex Renewable Energy Inc. Communicable Disease Prevention Plan – USA Operational Facilities)



§25.53 (e)(2)(D)

| Version Control | | | |
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| INNERGEX | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect:1/12/2022 Revision: 0 |
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Communicable Disease Prevention Plan – USA Sites

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| Effective Date: | January 12, 2022 |
| Review Date: | January 12, 2023 |

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| DEVELOPED BY: |  Senior Director – Operations & Maintenance |
| APPROVED BY: |  Senior Director – Health and Safety |

Revision History

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| 0 | | | New issue |



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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect:1/12/2022 Revision: 0 |
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Table of Contents

| | | |
|-------|---|----|
| (1) | Introduction..... | 3 |
| (2) | Risk Assessment | 3 |
| (2.1) | Normal Operations..... | 3 |
| (2.2) | Innergex Visitors | 4 |
| (2.3) | Contractors | 4 |
| (3) | Responsibilities | 4 |
| (3.1) | Director – Operations & Maintenance..... | 4 |
| (3.2) | Operations Manager | 4 |
| (3.3) | Site Manager | 4 |
| (3.4) | Innergex Employees | 4 |
| (3.5) | Innergex Visitors and General Contractors | 5 |
| (3.6) | O&M Service Providers and their Visitors and Contractors..... | 5 |
| (3.7) | OHS Department..... | 5 |
| (4) | Training/Signage | 5 |
| (5) | Guidance on Handling Tools and Equipment..... | 6 |
| (6) | Health Monitoring..... | 6 |
| (6.1) | If workers become sick while at site | 6 |
| (7) | Physical Distancing..... | 7 |
| (8) | Isolation Protocol | 7 |
| (9) | Disinfecting Protocol | 8 |
| (10) | Practice Proper Waste Management..... | 8 |
| (11) | Cleaning Vehicles | 8 |
| (12) | Infection Control Supplies..... | 9 |
| (13) | References | 10 |

| | | |
|---|--|--|
|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect: 1/12/2022 Revision: 0 |
|---|--|--|

(1) Introduction

A communicable disease is an illness caused by an infectious agent or its toxic product that can be transmitted in a workplace from one person to another. Examples of communicable diseases that circulate in a workplace include Covid-19 and seasonal influenza.

The purpose of this document is to provide Innergex staff with guidance on how to prevent the spread of a communicable disease at operational facilities (sites) and in the case of someone on site contracting the disease, how to provide an effective response. Innergex is prepared to implement or maintain additional measures when the risk of communicable disease at the site is elevated, as advised and directed by the CDC or OSHA.

At Innergex USA operational sites, there is no on-site accommodation, and workers either live at home or (in the case of visitors and general contractors), stay at hotels local to the site.

With the COVID vaccination campaign launched nearly a year ago, Innergex believes that every person has had the opportunity to become fully vaccinated. While we respect individual decisions of the non-vaccinated, Innergex recommend that **all persons be fully vaccinated to work at our sites**. Our goal is to offer the safest work environment possible for the maximum number of employees.

A person will be considered fully vaccinated >14 days after receiving:

1. The second dose, of a two-dose vaccine approved for use by the US Food & Drug Administration (FDA). Mixed first and second dose vaccines are accepted. Those vaccines are:
 - Pfizer-BioNTech Comirnaty vaccine
 - Moderna Spikevax vaccine
 - AstraZeneca Vaxzevria vaccine (for Canadian residents only)
2. A single dose of a one-dose vaccine approved by the FDA:
 - Johnson & Johnson Janssen vaccine

OR

3. Providing evidence of having recovered from Covid-19 in the 180 days prior to the current date.

OR

4. Providing evidence of a positive antigen test up to 270 days after recovering from COVID-19.

Any person who is unvaccinated will be allowed to work on our sites but will be subject to additional precautions to mitigate the spread of the disease.

(2) Risk Assessment

(2.1) Normal Operations

Under normal operations a relatively small number of workers (normally employed at the site)) are present and potential interactions with others is minimal. The risk of broad transmission within the on-site workforce is low.

(4) Training/Signage


1. During the orientation process, all Innergex operations workers, visitors, and contractors will review the basic requirements of the Innergex USA Sites CDP Plan.
2. The CDP Plan and any relevant orders/notices from the CDC or OSHA will be posted at the site office.
3. During the orientation process, all O&M contractor NS operations workers, visitors, and contractors will review the basic requirements of the O&M Contractor COVID-19 policy.
4. OSHA coronavirus Safety Tips for Posters to be posted in common areas and washrooms on site. Example:



Workplace Safety Tips for Coronavirus

1. Encourage workers to stay home if sick.
2. Encourage respiratory etiquette, including covering coughs and sneezes.
3. Provide a place to wash hands or alcohol-based hand rubs containing at least 60% alcohol.
4. Limit worksite access to only essential workers, if possible.
5. Establish flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), if feasible.
6. Discourage workers from using other workers' phones, desks, or other work tools and equipment.
7. Regularly clean and disinfect surfaces, equipment, and other elements of the work environment.
8. Use Environmental Protection Agency (EPA)-approved cleaning chemicals with label claims against the coronavirus.
9. Follow the manufacturer's instructions for use of all cleaning and disinfection products.
10. Encourage workers to report any safety and health concerns.

osha.gov

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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect: 1/12/2022 Revision: 0 |
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(5) Guidance on Handling Tools and Equipment

1. Shared tools and equipment must be wiped down and cleaned with a disinfecting agent such as disposable wipes or a diluted bleach solution, between uses by different workers. Rubber gloves should be worn while handling bleach solutions, and the area should be well ventilated.
2. It is recommended that workers who use specialized PPE and are properly trained in its use (e.g., workers certified and trained to use PPE because of their normal work role) and do not share PPE with other workers. Where necessary, establish a labeling system to help with organization of this specialized equipment.
3. Workers who wear leather gloves or other impermeable gloves as hand protection during work may share tools and equipment without disinfecting the tools between each user and must continue to clean and wash hands to break the chain of infection. Leather gloves may have droplets on them and could transmit infection to another worker. Workers should label and must keep track of leather gloves to ensure each pair remains with one worker.

(6) Health Monitoring

Prior to the start of each shift all Innergex employees, visitors and contractors must assess themselves for any signs or symptoms of communicable diseases. If showing signs or symptoms, do not report to work, notify your supervisor and follow guidelines issued by CDC or the local health authority.

Innergex and O&M Provider staff and contractors, will be required to check-in and out daily to indicate that they are aware of the relevant plan requirements and are free from communicable disease symptoms.

Innergex employees will be required to review this plan with Innergex General Contractors and Visitors accessing the site. The contractor or visitor will be required to complete the Communicable Disease Plan Screening Questionnaire, before being allowed on site. This includes the visual verification of 'proof of vaccination' records or similar (see introduction) or negative Rapid Antigen or PCR Test. Innergex will maintain a log of workers/visitor's names and date of record check. Innergex will not require a copy of official documents.


Rapid Antigen Tests will be applied when an Innergex employee, contractor, or visitor comes to site and has not been vaccinated. If the test is deemed positive for COVID-19, then we ask that the person goes to the nearest testing site and takes a PCR test for follow up results or observe the self isolation period recommended by the CDC or local health authority before returning to site to take another rapid antigen test. Staff can request Rapid Antigen Tests if they have been working in proximity to personnel they know are unvaccinated or have symptoms of Covid-19.

Additionally, the Operations or Site Manager can request that a person take a Rapid Antigen Test if they have recently travelled to other sites or out of the country or when the risk of infection is high (for example; when new variants of the COVID-19 virus are active).

If you have been in close contact with someone who has tested positive for COVID-19 then follow the guidelines issued by the CDC or local health authority.

(6.1) If workers become sick while at site

Workers who become ill during the workday should promptly separate themselves from other persons, inform their supervisor or the Site Manager and leave site. The Site Manager will inform / liaise with the coronavirus committee about potential exposures and mitigation to prevent the spread of the disease.

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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect: 1/12/2022 Revision: 0 |
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(7) Physical Distancing

Physical distancing is done to reduce the spread of communicable diseases such as Covid-19. During heightened risk of Covid -19 in the workplace (as advised by the CDC, or OSHA) all work activities should ideally be structured in a way that workers can maintain distance of 6ft/2 metres from each other. If physical distancing cannot be maintained, the workers' vaccination status will determine the controls. Example:

Fully Vaccinated – mask use is **recommended** when 6ft/2m distance cannot be maintained between workers indoors or outdoors.

Not vaccinated – if the worker has not been vaccinated against Covid-19 or cannot provide proof of vaccination; or proof of having contracted and recovered from COVID-19, then mask use is **mandatory** when within 6ft/2m of another worker indoors or outdoors (including traveling in a vehicle).

Note: If circumstances dictate (for example, in the case of higher numbers of local cases), the Operations or Site Manager can stipulate that:

- The site is at heightened risk of Covid-19 in the workplace – in the absence of any formal communication from OSHA.
- Masks will be mandatory where physical distancing cannot be maintained regardless of the worker vaccination status.


If this decision is made, the Operations Manager will confer with the Innergex Occupational Health and Safety Department regarding next steps, including eventually reverting to the normal approach dictated in the CDP Plan.

(8) Isolation Protocol

In the event a worker develops any symptoms of a communicable disease, the Site Manager will:

1. If the worker is NOT onsite at the time:
 - Instruct the worker not to enter the workplace
 - Instruct the worker to confer with their primary care physician or a local Urgent Care facility in the case that the symptoms are typical of Covid-19
 - If the worker reports back that they are Covid-19 positive, immediately notify the Operations or Site Manager.
2. If the worker IS onsite at the time:
 - Ensure the worker wears a face mask to cover their mouth and nose, while making preparations to leave site.
 - Instruct the worker to leave site and go home or to their hotel.
 - If the worker is not well enough to travel alone, contact emergency services for safe evacuation from site.
 - Any rooms the worker has been in while symptomatic must be disinfected as per the daily disinfecting protocol.

Workers who have tested positive for COVID-19 may not return to site until they are free of symptoms and have isolated for a period specified by the CDC or local health authority.

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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect:1/12/2022 Revision: 0 |
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(9) Disinfecting Protocol

All common areas and surfaces should be cleaned at least once each day and after any potential contamination that may occur throughout the day. Examples of common areas and surfaces include washrooms, shared offices, common tables, desks, light switches, handrails, and door handles. Regular household cleaners are effective against many communicable diseases, when following the instructions on the label. Refer to the site-specific daily cleaning log sheet.

In addition, all touch areas of the workers pick-up truck will be disinfected at the start and end of shift.

Coronaviruses are enveloped viruses, meaning they are one of the easiest types of viruses to kill with the appropriate disinfectant product. The types of disinfectants that can be used include:

1. 500 parts per million chlorine solution: 1:100 [e.g., mix 10 ml household bleach (5.25%) with 990 ml water]
2. Accelerated hydrogen Peroxide (0.5%)
3. Quaternary Ammonium Compounds (QUATs)ii

Worker's hands should be cleaned frequently with an alcohol-based hand sanitizer (minimum 60% alcohol) or soap and water.

Hand hygiene is most important at the following times:

1. Before eating or preparing food.
2. After coughing, sneezing, or blowing one's nose.
3. Before and after contact with an ill person.
4. After touching dirty surfaces such as taps and doorknobs and after going to the bathroom.

Note that if a person's hands have dirt, food or anything else on them, they should use soap and water because hand sanitizer may not work. If hands are visibly soiled and running water is not available, it is acceptable to use hand wipes to remove the dirt and then use hand sanitizer.

(10) Practice Proper Waste Management

Proper collection and removal of garbage is crucial to reducing the risk of disease transmission. This includes wearing disposable gloves to remove waste from rooms and common areas and using sturdy, leak resistant garbage bags.

1. Work with your OEM site team to regularly dispose of trash, including on Fridays or before a long weekend, whether the cans are full or not.
2. Ensure only sturdy, leak resistant garbage bags are used.
3. Provide disposable gloves in a conspicuous location for anyone handling garbage.
4. Put up signs regarding proper handling of waste. Ensure that general hygiene and housekeeping points are covered occasionally in site safety meetings, including the removal of gloves and proper handwashing immediately after handling and disposing of waste.


If a garbage bag is punctured or contaminated, it should be placed into a second bag.

(11) Cleaning Vehicles

At the start of each working day and throughout the day, drivers must clean and disinfect frequently touched surfaces in the vehicles using an alcohol-based cleaner or disinfecting wipes/spray and paper towel; if these are unavailable, use soap and water.

High touch or key contact points include:

1. Door handles (inside and out)
2. Window buttons

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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect:1/12/2022 Revision: 0 |
|---|--|---|

3. Steering wheel and controls
4. Wiper and turn signal handle
5. Shifter grip
6. Dash controls and buttons
7. Ventilation grilles and knobs
8. Rear-view mirror
9. Armrests
10. Grab handles, seat adjusters
11. Seat belt buckles
12. Radio and communication devices

(12) Infection Control Supplies

It is recommended to maintain at least two weeks' worth of infection control supplies on the worksite. These supplies should be checked on a weekly basis to ensure that the inventory does not run out.

Examples of Recommended Personal Protective Equipment:


1. Face Masks:
 - a. Disposable three-layer non-medical masks
 - b. Cloth Face Masks
 - Must be made of at least three layers
 - Two layers should be tightly woven material fabric, such as cotton or linen
 - the third (middle) layer should be a filter-type fabric, such as non-woven polypropylene fabric
2. Disposable Gloves
3. Safety Glasses
4. Respirators
 - a. Full Face Respirator (to be cleaned after use).
 - b. Half Mask respirator (to be cleaned after use)

Examples of Recommended Hand Sanitizer, Cleaning and Disinfecting Supplies:

1. Bleach: sodium hypochlorite (5.25%)
 - a. 500 ppm (10mL bleach to 1L water) - Used for disinfecting surfaces (e.g., counters, doorknobs). Allow surface to air dry naturally
 - b. 1000 ppm (20mL bleach to 1L water) - Used for disinfecting surfaces contaminated with bodily fluids and waste (e.g., vomit, diarrhea, mucus, feces, only after cleaning with soap and water first). Allow surface to air dry naturally.
2. Accelerated hydrogen peroxide (0.5%) - Used for cleaning and disinfecting surfaces and equipment.
3. Quaternary Ammonium Compounds (QUATs) - Used for disinfecting of surfaces (e.g., floors, walls, furnishings).

Keep in mind:

1. Face shields do not replace masks or face coverings.
2. Neck gaiters (also known as neck warmers) are not a replacement for a three-layer non-medical mask
 - a. Exception is newer, specially constructed two-layer gaiters which are fitted with removeable filters (for the third layer).

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|  | Communicable Disease Prevention Plan – USA Operational Facilities | Nº: CDP In effect:1/12/2022 Revision: 0 |
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3. Masks with exhalation valves or vents are not allowed unless you also wear a three-layer non-medical mask with a filter layer over your exhalation valve mask

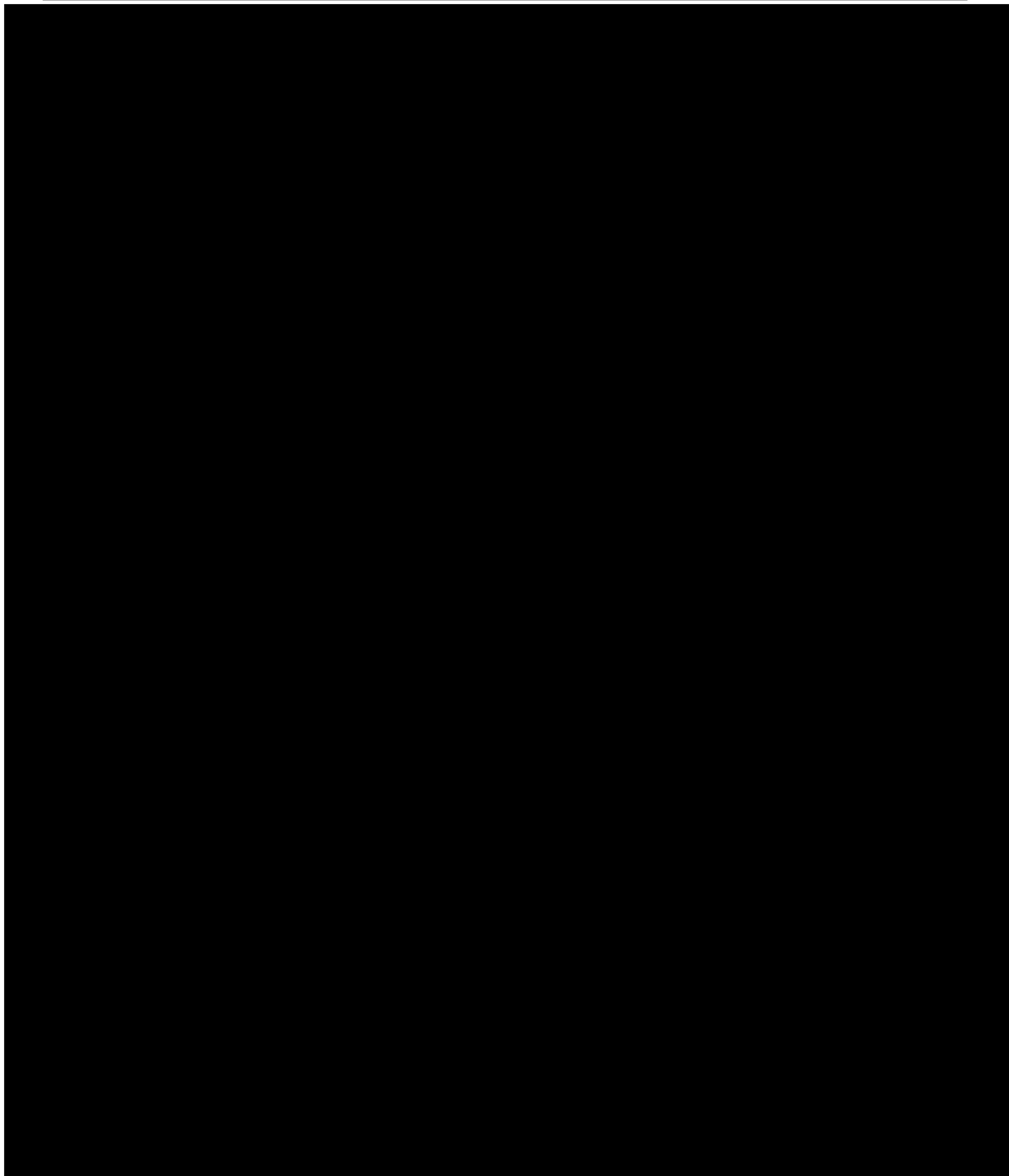
(13) References

1. <https://www.osha.gov/coronavirus/control-preventionguideforemployers/>
2. <https://www.cdc.gov/infectioncontrol/pdf/guidelines/disinfection-guidelines-H.pdf>
3. Communicable Disease Plan Screening Questionnaire
4. <https://www.cdc.gov/coronavirus/2019-ncov/your-health/about-covid-19.html>

INNERGEX

***Communicable Disease Plan Screening
Questionnaire
Access to sites for Innergex visitors and
contractors***

Nº: CDP Screening
Questionnaire US
In effect: Jan 12, 2022



Visitor Log

Note: Communicable Disease Prevention Protocols are in force at this office. Further information is available on the safety notice boards

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Foard City Wind, LLC**Hurricane Plan**

§25.53 (e)(2)(E)

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| 01 | 17-Mar-22 | Original version | SP/CL |
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Statement of Non-Applicability

Foard City Wind, LLC (FCW) is located near Crowell in North-Central Texas and is not within a hurricane evacuation zone. This section is therefore not applicable to the site. Should a hurricane strike the coast of Texas, by the time the weather front would hit the FCW site it would be considered a tropical storm.

Foard City Wind, LLC**Site Evacuation Plan**

§25.53 (e)(2)(H)

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| 01 | 27-Aug-19 | Published version | SP/MA/MC/CB/TN |
| 02 | 22-Mar-22 | Update to include in PUCT EOP as an appendix | SP/CL |
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Table of Contents

| | |
|---|---|
| 1. Purpose | 3 |
| 2. References | 3 |
| 3. Definitions | 3 |
| 4. Procedure..... | 3 |
| 4.1 Site Evacuation..... | 3 |
| 4.2 Site Escape | 4 |
| 4.3 Location of Operations Facilities & Muster Points | 5 |
| 4.4 Landing Zones | 5 |
| 4.5 Reporting..... | 6 |
| 4.6 All Clear | 6 |
| 4.7 Training | 6 |

1. Purpose

To provide a detailed description of Foard City Wind, LLC (FCW) Site Evacuation Procedure and when and how it should be implemented.

2. References

This procedure should be read and used in conjunction with the suite of FCW emergency response procedures.

3. Definitions

Evacuation: Is a controlled egress of all persons including contractors and visitors from the site. In cases of evacuation, it is assumed that the FCW O&M facility will be available as a base from which to co-ordinate the evacuation operation.

Escape: is when egress from the site must be undertaken in a rapid timeframe to avoid a major hazard. In cases of escape it is assumed that the FCW O&M facility will be immediately vacated and will not be an available location from which to co-ordinate ongoing operations. It is envisaged that this level of response could be necessary if an immediate life threatening situation exists, e.g. wildfire at or near the FCW O&M building.

Rescue: Is the recovery of persons after they have 'escaped' from a hazardous situation or environment. This document assumes that persons can drive to a place of safety 'off-site' (muster point) and will not need to be rescued.

Escalation will normally be initiated via a 911 call to the emergency services. Escalation can also be initiated via the Rockstar device by pressing the red emergency button.

Emergency plant shutdown procedures should be implemented prior to site evacuation only if the facility is threatened. This would involve putting all wind turbines in pause before de-energizing the FCW main transformer and requesting de-energization of the transmission line from ETT/American Electric Power (AEP).

The Plan of the Day (POD) information and visitor log shall be used to account for persons during roll call.

4. Procedure

4.1 Site Evacuation

The decision to evacuate site will be taken by the Site Manager (or Manager – Operations if responsibility delegated) following consultation with the GE Site Manager. Circumstances giving rise to evacuation of site include but are not limited to:

- A situation which has the capacity to threaten the integrity of the O&M building and the safety of persons inside within a defined timeframe.
- Advice to evacuate from a recognized authority: i.e., County Sherriff's Dept. or Fire Dept.

The Site Manager with the assistance of the GE Operations team on site will coordinate the following:

- a) Initiate the evacuation procedure via text message and request all persons to report to the designated off-site muster area for roll call. All text recipients must respond to confirm that text has been received.

NOTE: For roll call, depending on circumstances either the primary off-site muster location will be used, or a secondary muster location must be determined by the Site Manager.

- b) If required, implement emergency plant shutdown procedures.
- c) Identify the safest evacuation route and method. This will include:
 - Identification of transport requirements from the site to the primary or secondary muster point.
 - Onward transportation requirements (if required).
 - Identification of GPS co-ordinates for the identified muster point.
- d) Request assistance for evacuation transportation if persons are injured. NOTE: this will normally be via 911.
 - Provide details of injured persons to be evacuated (number and severity of injury).
- e) Perform a roll call of all persons expected to be at the muster point.
 - Take a copy of the POD and visitor logs for the day to be used to identify persons on site.
- f) Handle casualties and communicate with emergency services as indicated in the following relevant sections.

4.2 Site Escape

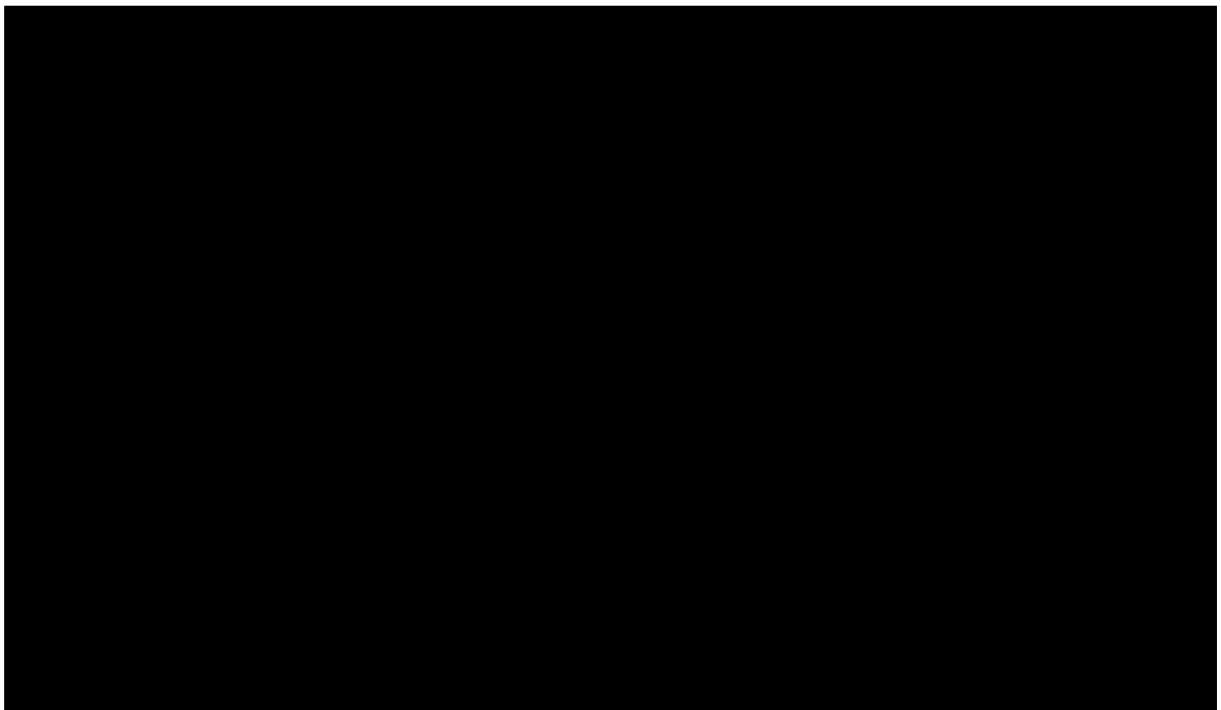
The decision to escape from the FCW O&M building will be taken by the Site Manager following consultation with the GE Site Manager (or in their absence the GE Site Lead Technician) and in consideration of information immediately available. Circumstances giving rise to the escape from the FCW O&M building and site would be:

- An immediate life-threatening situation to the O&M building or adjacent substation or wind turbine from a natural disaster event or catastrophic failure of plant.

The Site Manager with the assistance of the GE operations crew on site will coordinate the following:

- a) Assess the emergency and identify the muster point to be used (either primary or secondary, depending on circumstances).
- b) Initiate the escape procedure via text message and request all persons to report to the designated off-site muster area for roll call. All text recipients must respond to confirm that text has been received.

- c) If required, initiate emergency plant shutdown procedures. Note: this can be done remotely via the GE Remote Operating Center (ROC) so escape should not be delayed.
- d) Proceed to the muster point with a copy of the POD and the daily visitor log.
- e) Perform a roll call of all person(s) expected to be at the muster point.
- f) Request assistance for evacuation transportation if persons are injured. NOTE: this will normally be via 911.
 - Provide details of injured persons who will need to be evacuated (number and severity of injury).



4.4 Landing Zones

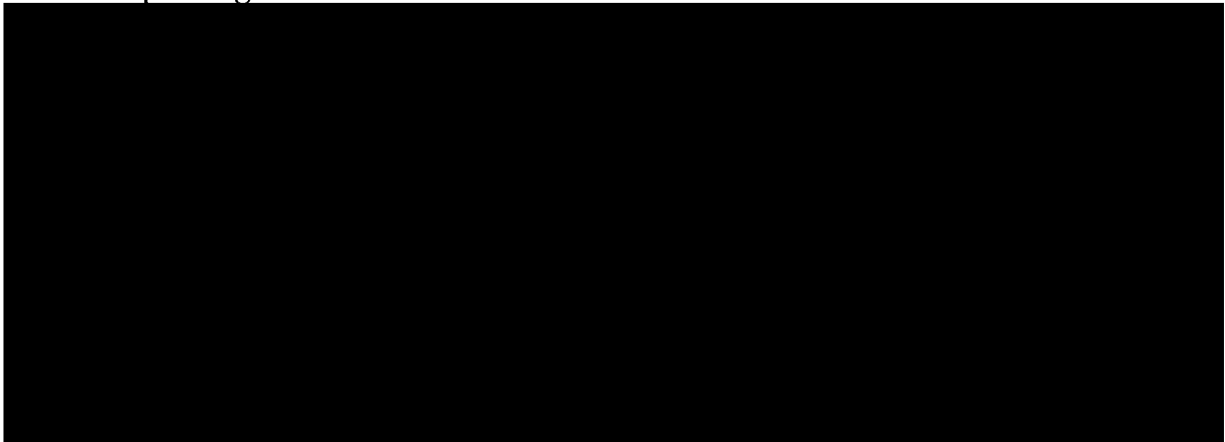
FCW does not have any designated locations for emergency evacuation helicopter landing zones. If required, the Site Manager will designate, clear and prepare the landing zone. Preparation of the landing zone to facilitate a helicopter landing would consist of the following:

- Survey parking area to remove all debris that could become airborne during helicopter landing. Note that rescue helicopters create hurricane force winds during take-off and landing.
- Move all mobile equipment and assets from the surrounding area.

At night:

- Lay out 4 Strobe Lights around the perimeter of the landing area.
- Park pick-up trucks approximately 100m from the perimeter of the landing zone.

4.5 Reporting



As per all medical emergencies, an accident investigation form will be completed within 2 days of the incident and forwarded to the Operations Health and Safety Coordinator with a copy to the Director – Operations and Maintenance.

4.6 All Clear

The Site Manager shall consult with Emergency Services before announcing an all clear which would signal those persons can return to the FCW site and O&M building.

4.7 Training

FCW will carry out site evacuation response drills on an annual basis, including confirmation of all emergency supplies.



Foard City Wind, LLC
Cyber and Physical Security Response Plan

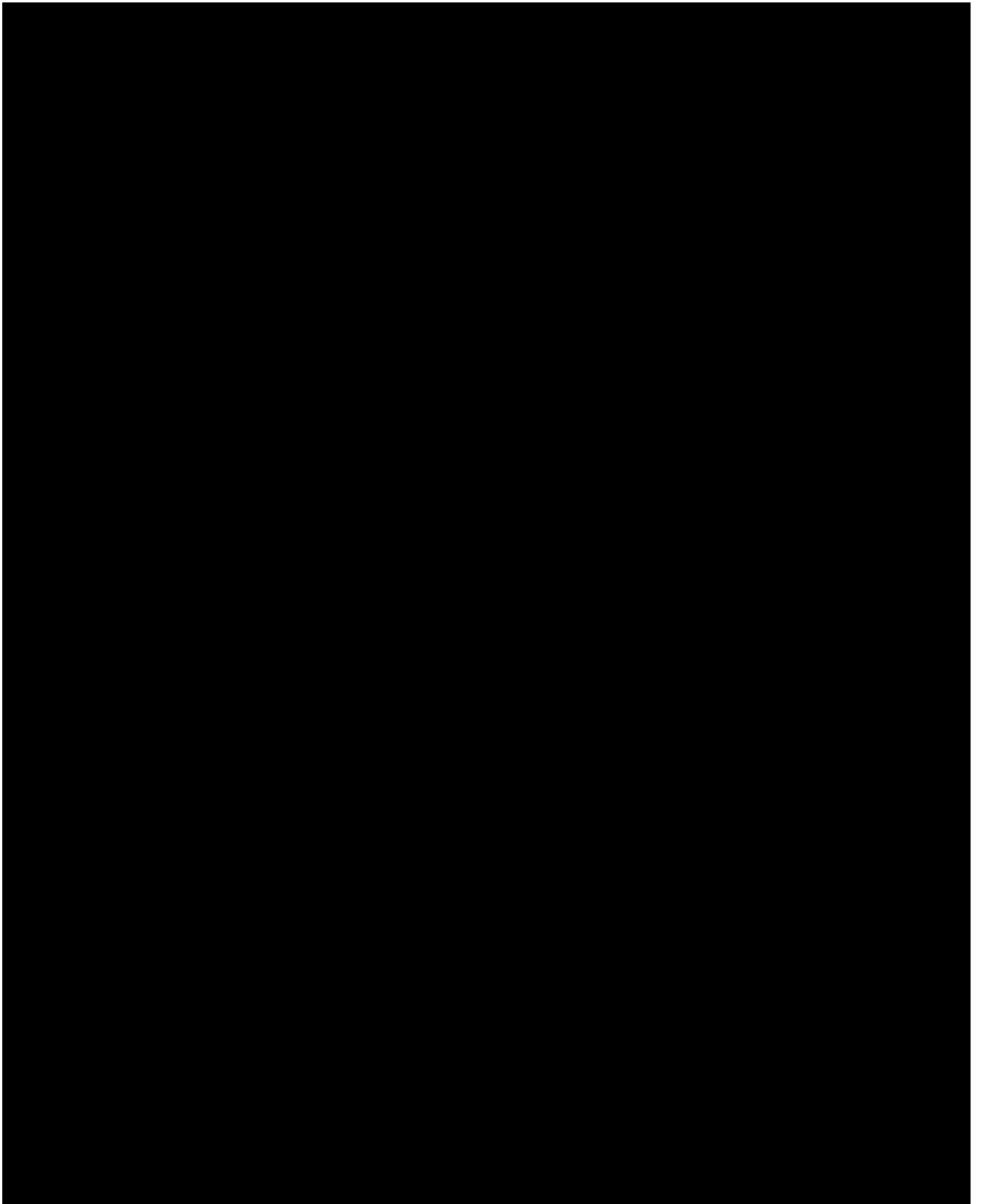
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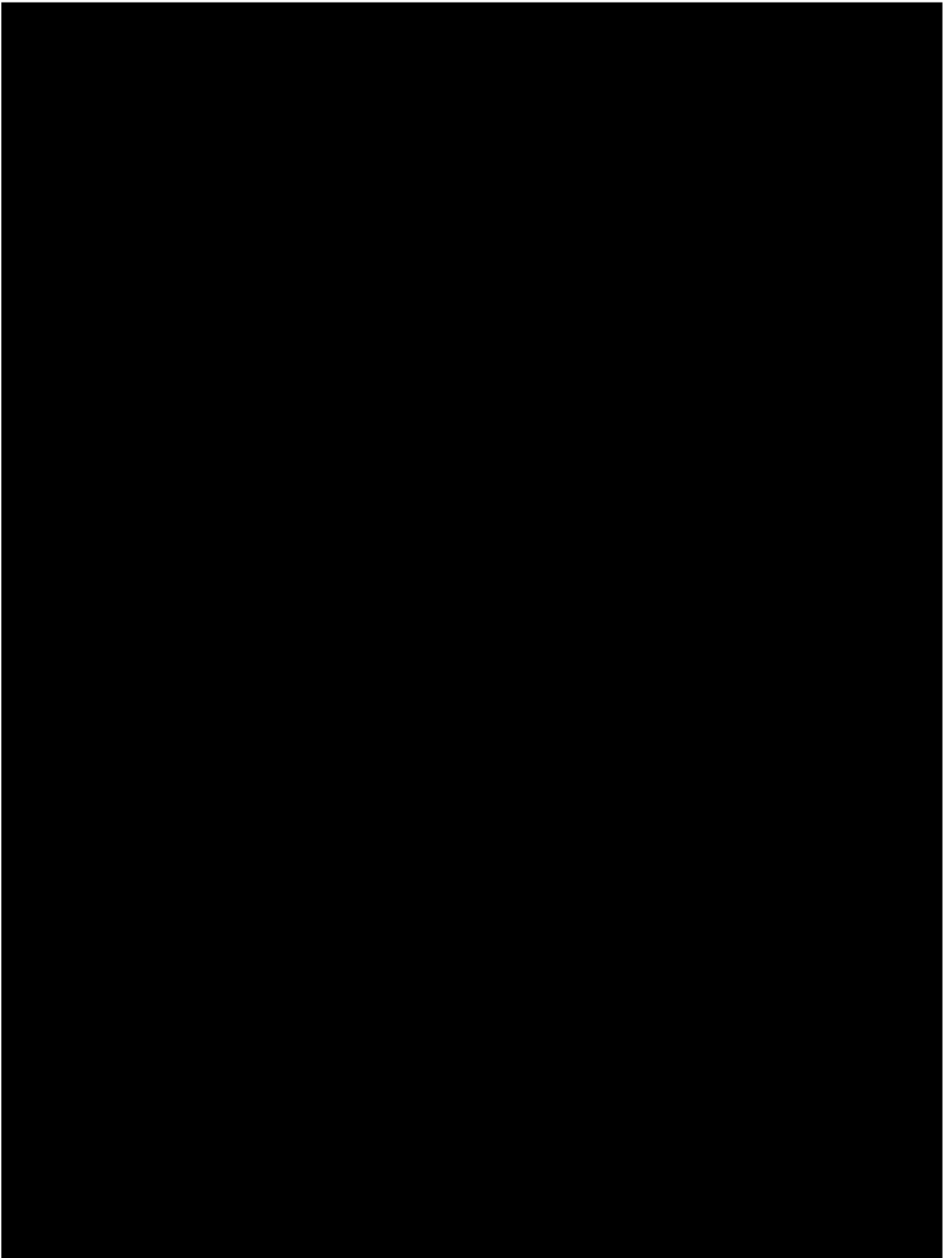
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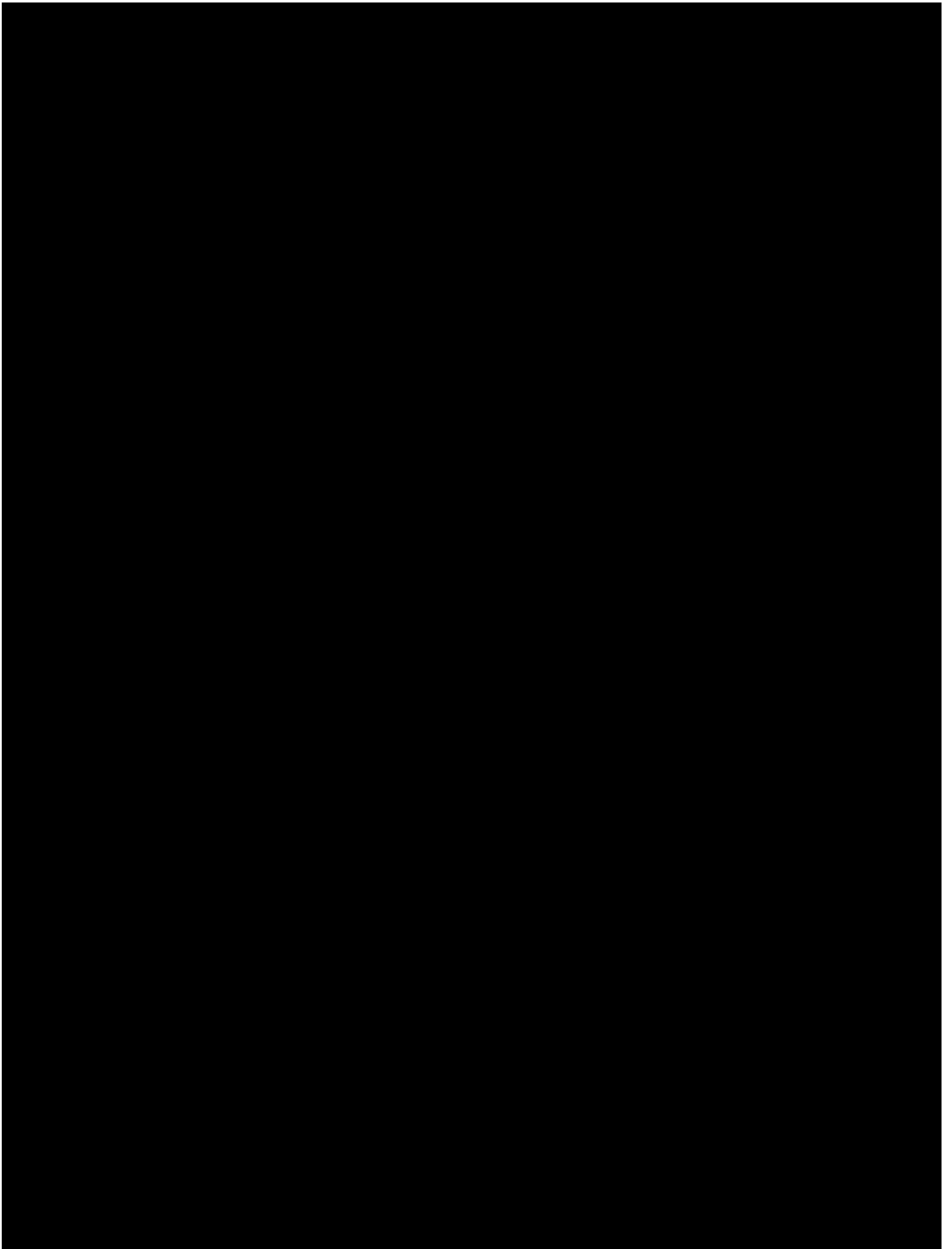
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| | | | |
| | | | |

Table of Contents

| | | |
|-------|---|---|
| 1 | Definitions | 3 |
| 2 | Introduction | 3 |
| 3 | Procedure..... | 3 |
| 3.1 | Cyber and/or Physical Security Incident Procedure | 3 |
| 3.2 | Cyber Security Emergency Response Task Force..... | 3 |
| 3.2.1 | Task Force Contacts and Members..... | 3 |
| 3.2.2 | Response Process..... | 4 |
| 3.2.3 | Cyber-Attack Prevention | 4 |
| 4 | Cyber and Physical Security Incident Response Plan..... | 4 |
| 4.1 | Recognize | 4 |
| 4.2 | Investigate and Evaluate..... | 4 |
| 4.3 | Communicate..... | 5 |
| 4.3.1 | Internal Communications..... | 5 |
| 4.3.2 | External Communications | 5 |
| 4.4 | Assess and Report..... | 5 |
| | Attachment K.1 IT-OT Response Process Flow | 7 |
| | Attachment K.2 Cyber-attack Prevention Measures | 8 |



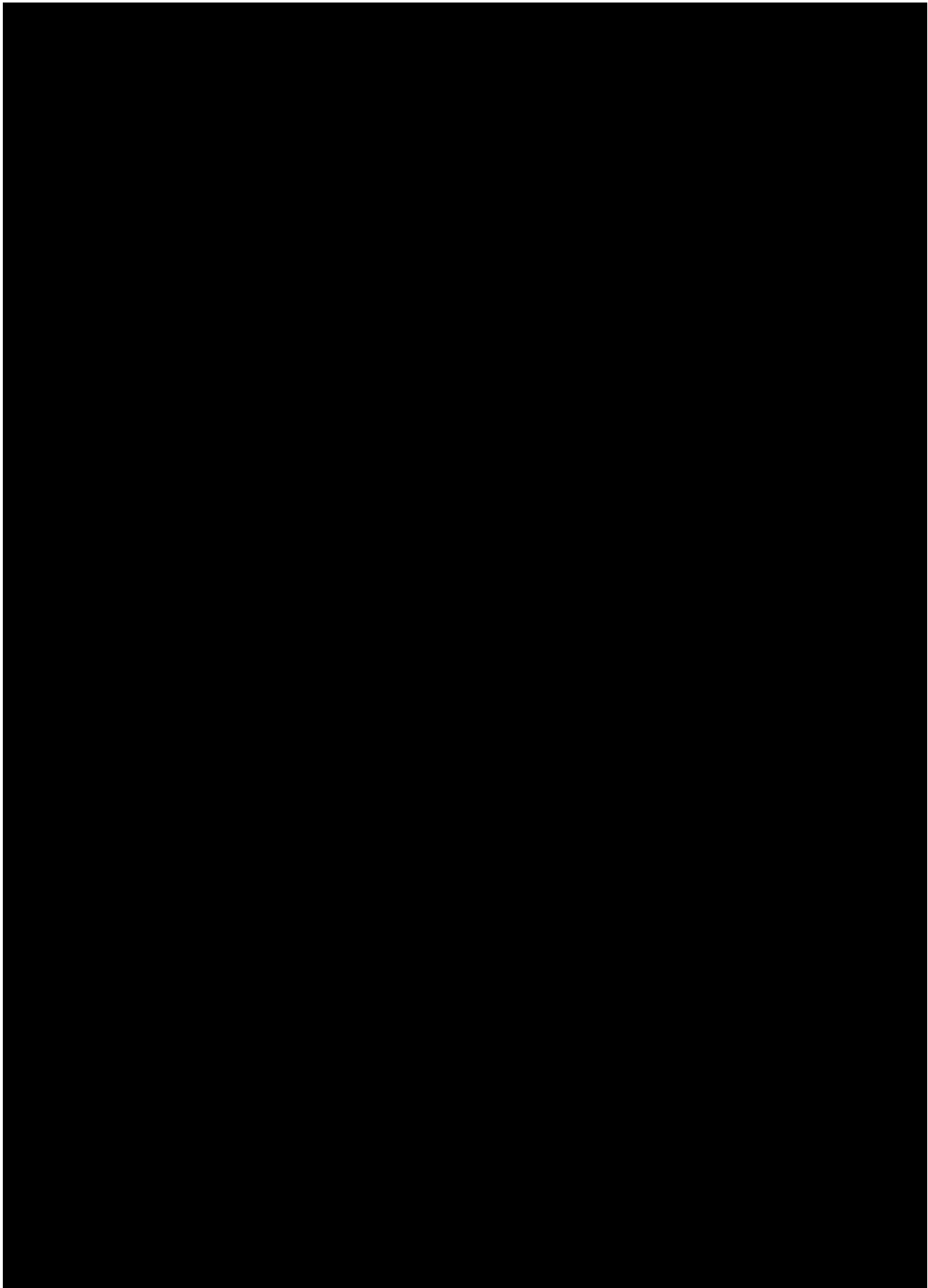






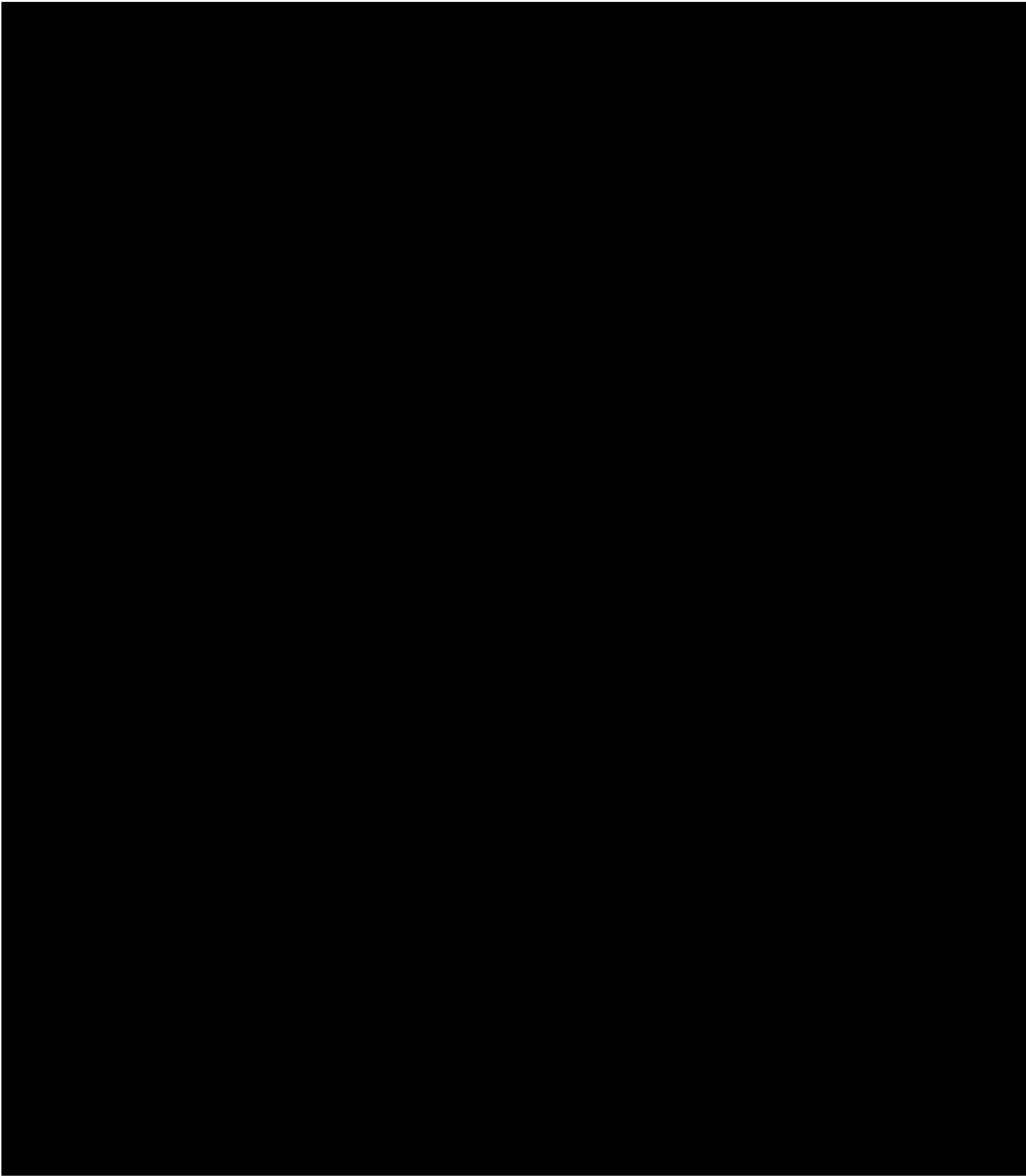


Attachment K.1 IT-OT Response Process Flow



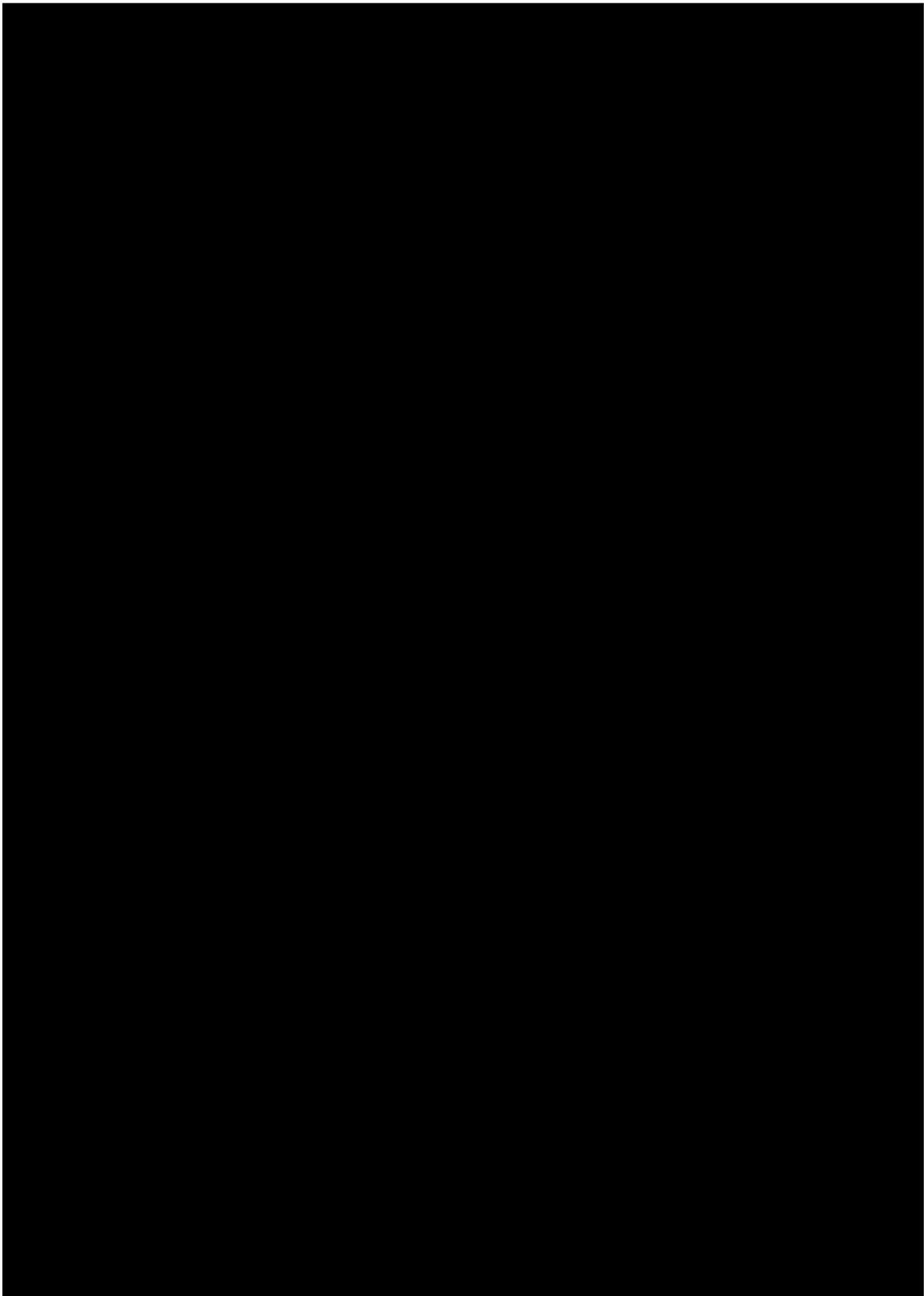
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Énergie renouvelable.
Développement durable.





Attachment K.2 Cyber-attack Prevention Measures



Foard City Wind, LLC**Drills Process**

§25.53 (f)

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Drill Process

Foard City Wind (FCW) commits to carrying out at least one drill each calendar year to test its Emergency Operations Plan (EOP). FCW is not located in a hurricane evacuation zone; the hurricane appendix will not be tested as part of an EOP drill.

The objective of a drill shall be to test one or more elements of the FCW EOP. FCW shall endeavor to ensure that drills to test the same elements are not repeated year-on-year so that all aspects of the EOP are tested over time.

Drills shall be carried out as either a desktop exercise and/or in-person functional exercises. In-person functional exercises shall be carried out in a realistic, real-time environment and, where possible, involving local emergency response.

Drills shall be either announced or unannounced and will be performed under varying conditions dependent on the element of the EOP being tested.



Notice of Drill

As part of the drill planning process, FCW shall, at least 30 days prior to the date of at least one drill each calendar year, notify the Public Utilities Commission of Texas staff and the appropriate Texas Division of Emergency Management District Coordinators by email of the date, time, and location of the drill. It should be noted that all scheduled drill dates are subject to change and may need to be rearranged at the last minute in response to weather events and changes in operating conditions.

Lessons Learned

As a part of the drill process FCW shall carry out a post-drill review exercise to discuss, evaluate and document the results of the drill. This exercise shall serve to analyze the EOP, the participants' performances and provide corrective actions for areas identified for improvement. An outcome of this exercise will be an improvement plan to ensure that any changes, additions, and deletions to the EOP or training are carried out within a specific timeline.

Commitment to Training

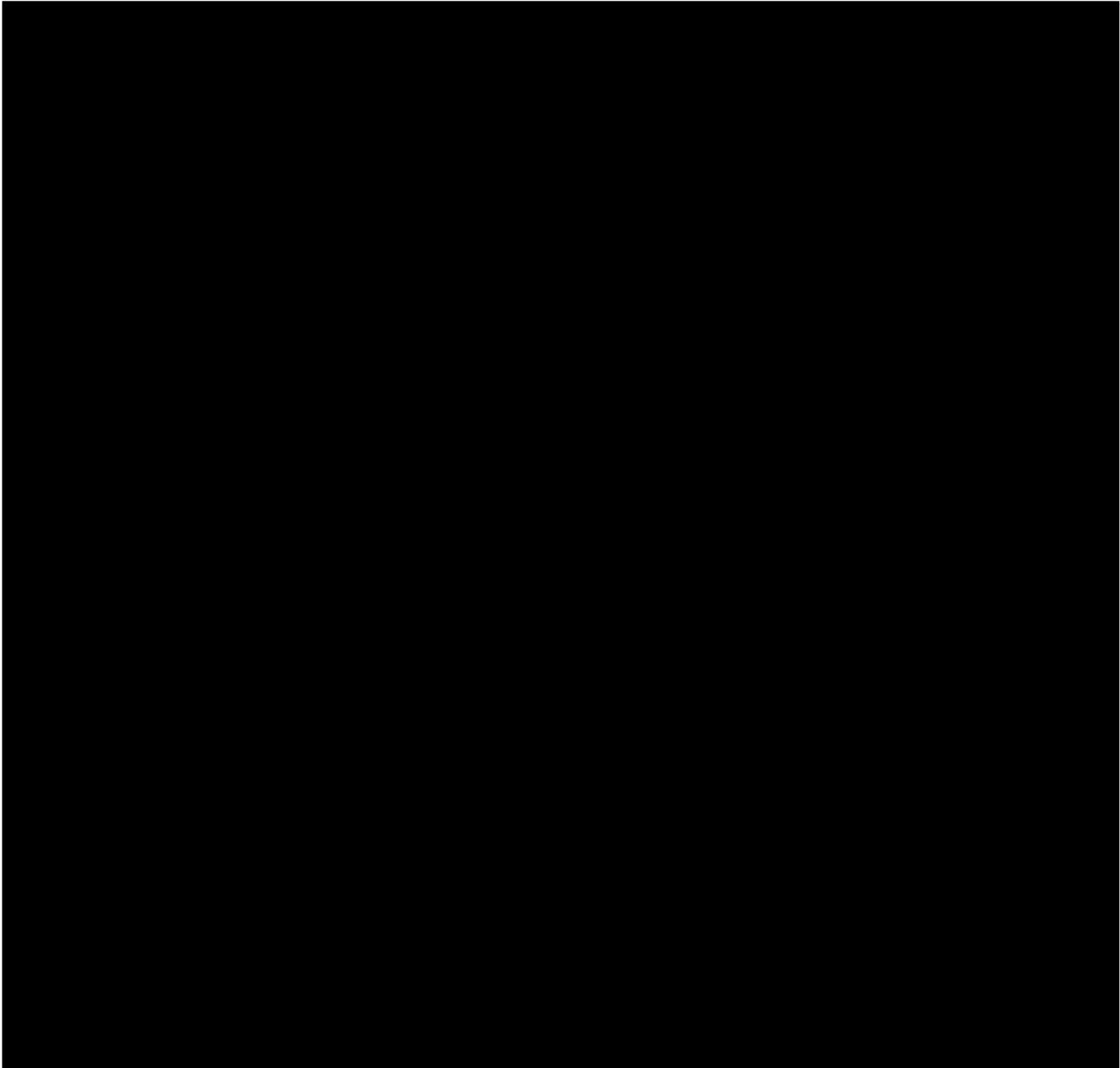
FCW commits to carrying out training on its EOP on an annual basis to ensure that all applicable teams and individuals within those teams are clear on their roles and responsibilities. All operations partners shall be invited to the training. The EOP shall be shared with local emergency responders as needed. A record of all training and EOP distribution shall be maintained.

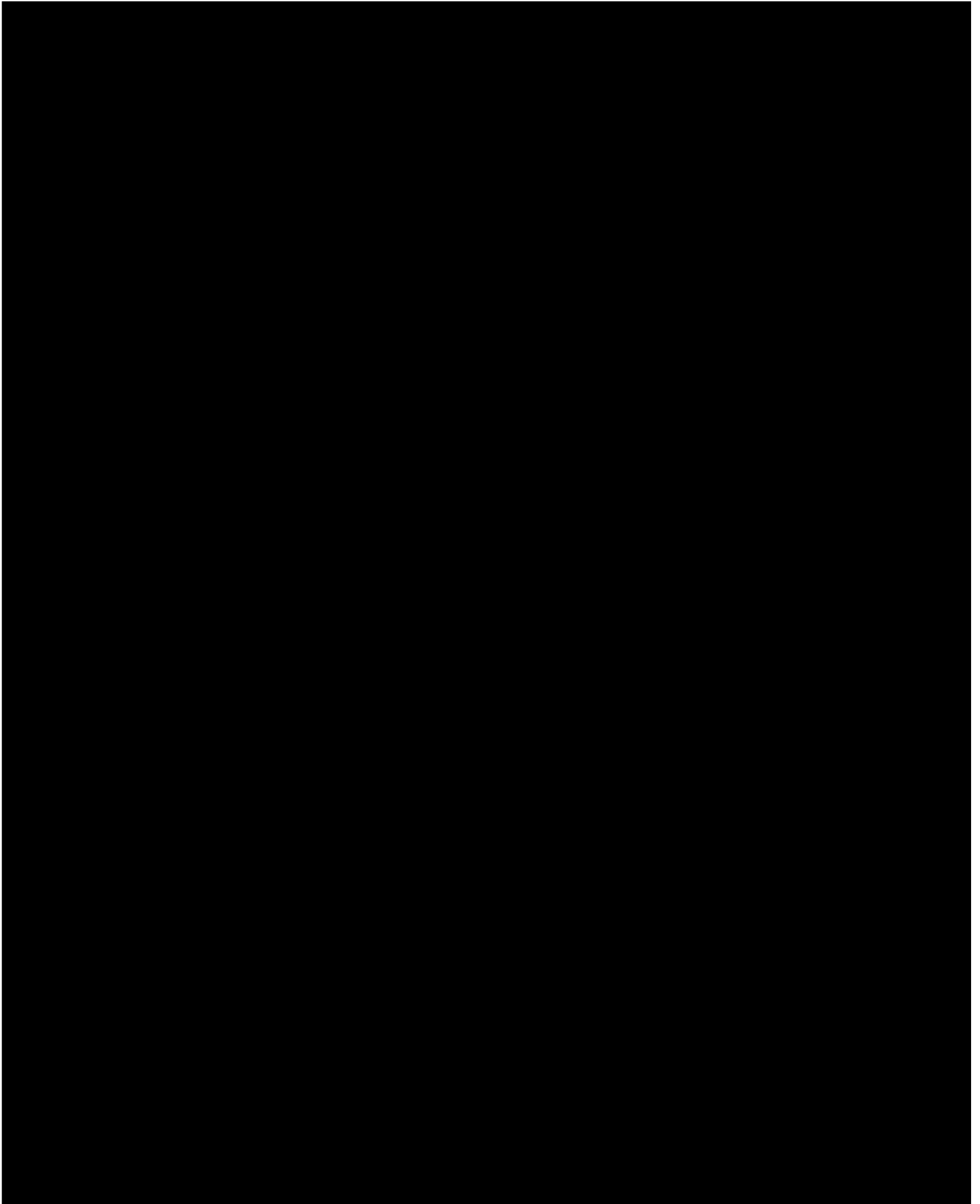
Foard City Wind, LLC
Record of Distribution
§25.53 (c)(4)(A)

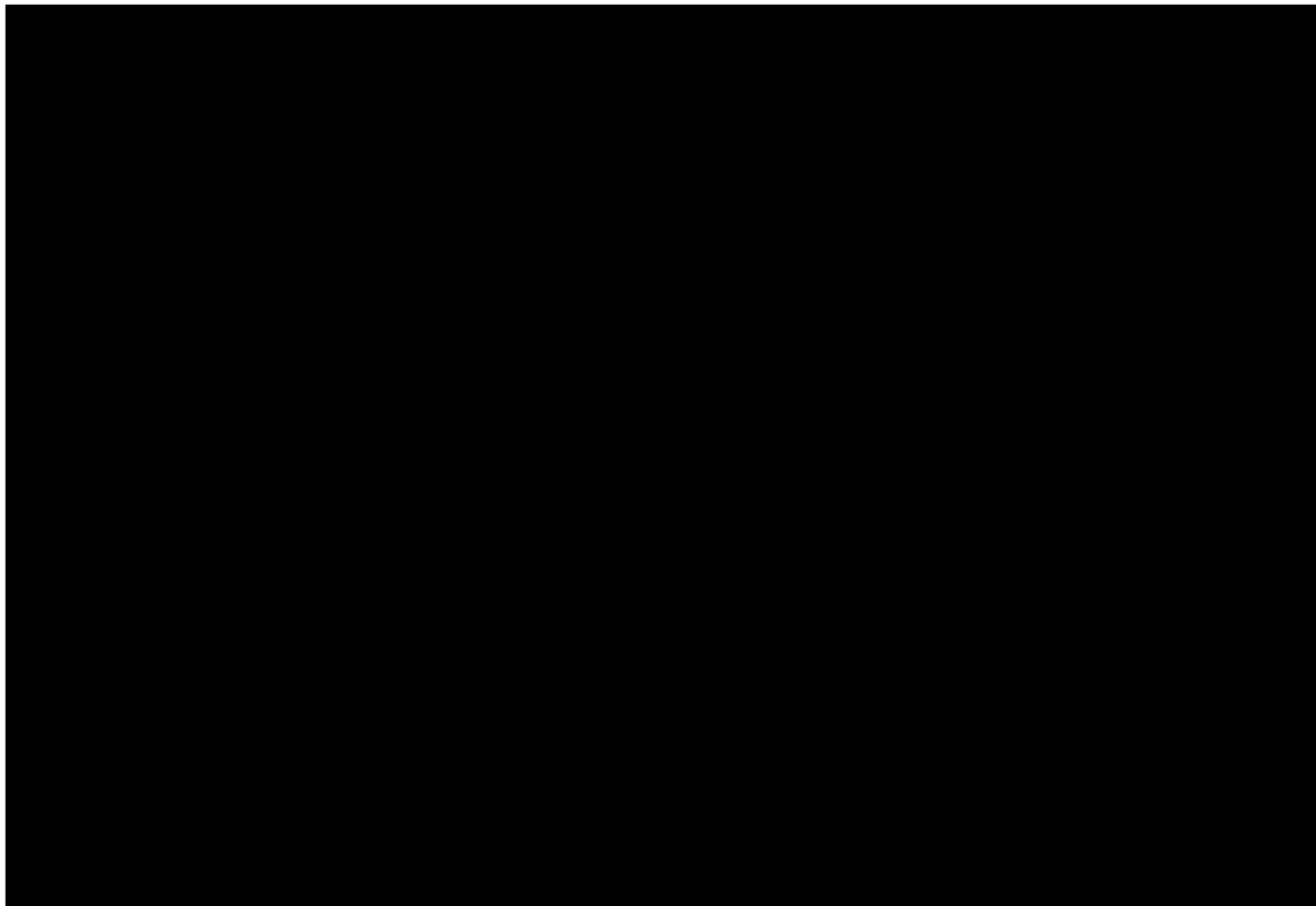
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Record of Distribution and Training

The following table contains a list of persons for FCW who have received access to and training on the Emergency Operations Plan (EOP) and/or the following FEMA (Federal Emergency Management Agency) training modules:

- IS-100 – Introduction to the Incident Command System
 - IS-200 – Basic Incident Command System for Initial Response
 - IS-700 – An Introduction to the National Incident Management System
 - IS-800 – National Response Framework, An Introduction
- 





Foard City Wind, LLC**Emergency Contacts**

§25.53 (c)(4)(B)

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INNERGEX

Foard City Wind
Emergency Contact List

195 County Road 337
Crowell, Texas 79227
GPS:
33.921316, -99.787260

Innergex

| Name | Title | Office | Cell | Home | Email |
|--|--|--------------|--------------|------|--|
| Charles Burton (Primary Site Contact) | Foard City Site Manager | 940-474-3303 | 325 267-0354 | | CBurton@innergex.com |
| Marcus Correale (Secondary Offsite Contact) | Interim Operations Manager / Griffin Trail Site Manager | 940-889-4356 | 940-280-1979 | | mcorreale@innergex.com |