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Emergency Operations Plan

Tres Bahias Solar Power, LLC

POLICY NAME	Emergency Operations Plan
EFFECTIVE DATE	8/1/2023
VERSION NO.	1.0

TRES BAHIAS SOLAR POWER, LLC EMERGENCY OPERATIONS PLAN | TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

1.1 Facility Information

Tres Bahias Solar Power, LLC (Tres Bahias) is a 195 MWac (nameplate) solar facility located at 2426 FM 2143, Port Lavaca Texas, 77979 in Calhoun County. The Facility is due to commence commercial operations in Q4 of 2023 and is interconnected to ERCOT at the 138 kV Joslin substation located in TRE footprint. This Plan will become effective upon COD declaration.

1.2 Public Utility Commission of Texas

This Plan provides guidance and direction to Tres Bahias Solar Power, LLC Tres Bahias 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. Tres Bahias 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). Tres Bahias 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, Tres Bahias 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 Tres Bahias who can immediately address urgent requests and questions from the PUCT during an emergency.

Emergency Coordinators			
	Site Manager Asset Manager		
	Area Manager Site Supervisor		

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	5	Section 1.0
(c)(1)(A)(i)(II)	Executive Summary – Requirements Reference	6	Section 1.5
(c)(4)(A)	Executive Summary – Record of Distribution	7	Section 1.6
(c)(4)(B)	Primary and Backup Emergency Contacts	5	Section 1.4
(c)(4)(C)	Executive Summary - Affidavit	8	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
(2)(A)(iii)	Attachment 3: Pre-Winter Checklist Attachment 6: Extreme Cold or Severe Weather Checklist	29- 35	Pre-Winter Checklists Extreme Cold or Severe Weather Checklists
(2)(A)(iii)	Attachment 3: Pre-Summer Checklist Attachment 6: Extreme Hot Weather Checklist	36- 42	Pre-Summer Checklists Extreme Hot Weather Checklists

1.6 Record of Distribution

Below is a record of all Tres Bahias 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
	Swift Current Energy	Compliance Manager	
	Swift Current Energy	Site Manager	
	Swift Current Energy	Site Coordinator	
	Swift Current Energy	Asset Manager	
	Swift Current Energy	VP of Environmental	

1.7 TAC §25.53 Affidavit

AFFIDAVIT

STATE OF TEXAS §

§

COUNTY OF Harris §

Before me, the undersigned notary public, on this day personally appeared William Kelsey, 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 Brittany Eduards. I am over the age of eighteen and am a resident of Texas. I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of Tres Bahias Solar Power, LLC.

2. I swear or affirm that in my capacity as William Kelsey of Tres Bahias Solar Power, LLC, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT.

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

• Relevant operating personnel are familiar with and will have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

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

• Drills will be conducted to the extent required by subsection (f) of PUC Subst. R. § 25.53 by: December 15, 2023.

• The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

• Tres Bahias Solar Power, LLC maintains a business continuity plan those addresses returning to normal operations after disruptions caused by an incident; and

• Tres Bahias Solar Power, 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.

5. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief."

Further affiant sayeth not.

William Kelsey

Manager

Tres Bahias Solar Power, LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 24 day of January, 2023.

Brittany Edwards
My Commission Expires
8/2/2026
Notary ID133887374

Notary Public in and for the State of Texas

My Commission Expires:
8/2/2026

2.0 ROLES AND RESPONSIBILITIES

This EOP applies to the Tres Bahias described in Section 1.1 of the EOP. This Section describes the responsibilities and activities required of various parties in preparation for an emergency. Tres Bahias understands that corporate and facility management, with critical execution and support from NovaSource, 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 Tres Bahias Personnel

2.1.1 Role –O&M, GO and GOP Compliance, and Asset Management personnel, which include all roles listed in this section.

2.1.2 Responsibilities

a. Participate in plan training.

b. Follow this plan and perform actions, as described in this plan.

2.2 Tres Bahias Generator Owner Compliance Manager

2.2.1 Role – The Generator Owner Compliance Manager for the Facility.

2.2.2 Responsibilities:

a. Owner of this Plan.

b. Administers Generator Owner (GO) Compliance Program for the Facility.

c. Responsible for maintaining and implementing, in coordination with O&M and Asset Personnel, this Plan.

2.3 Tres Bahias Generator Operator Compliance Manager

2.3.1 Role – The Generator Operator Compliance Manager for the Facility.

2.3.2 Responsibilities:

a. Participate in the development and review of this Plan.

b. Administers Generator Operator (GOP) Compliance Program for the Facility.

2.4 NovaSource Operations Control Center Manager

2.4.1 Role – The Operations Control Center (OCC) Manager for the Operations and Maintenance contractor, also the Generator Operator (GOP) of the Facility.

2.4.2 Responsibilities:

a. Responsible for Emergency response and essential operations to restore Operations Control Center functionality.

b. Participate in training.

2.5 FACILITY LEAD

2.5.1 Role – The plant services manager.

2.5.2 Responsibilities:

a. Participate in the administration, execution, and update of the plan.

b. Oversee the day-to-day operation of the Facility.

c. Serves as the summer and winter readiness coordinator.

d. Ensures the requirements and processes laid out in this plan are followed by all site Personnel.

e. Provide feedback to management on this plan and any lessons learned to improve the plan.

2.6 NovaSource Field Technicians

2.6.1 Role – Administers O&M responsibilities at Facility

2.6.2 Responsibilities:

a. Coordinate with the Facility Lead Technician to ensure that this plan is properly executed.

b. Participate in responses to emergency events at the Facility.

c. Conduct any plan readiness reviews and provide reports to management.

d. Ensures the requirements and processes laid out in this plan are followed by all site Personnel.

e. Provide feedback to Facility Lead Technician on this plan and any lessons learned to improve the plan.

2.7 Asset Management

2.7.1 Role – Asset Management subcontractor for the Facility

2.7.2 Responsibilities:

a. Participate in the administration, execution, and update of the plan.

b. Coordinates with O&M, GO, GOP contractors in compliance and operations matters.

c. Participate in training.

2.8 Asset Owner

2.8.1 Role – Investor with primary ownership of the Facility

2.8.2 Responsibilities:

a. Sign affidavits regarding completion of the plan.

b. Coordinate with Asset Manager on compliance and operations matters.

c. Participate in training.

3.0 APPROVAL, IMPLEMENTATION, AND CONTINUAL IMPROVEMENT

3.1 Introduction and Applicability

This Plan provides guidance and direction to Tres Bahias 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. Tres Bahias 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 by the GO Compliance Manager for Tres Bahias. 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	R. Ferrell	5/31/2023	New procedure	
2.0		10/20/2023	Updated contact information and Effective Date	

Version 1.0 of this EOP was approved on the date of PGC submission.

Version 1.0 of this EOP supersedes all previous EOPs.

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 confirm 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

If any member of the Project is contacted by someone claiming to be a media representative, state upfront that no comment can be provided. Request their name, phone number, and their represented publication, and tell them their contact information will be sent to the appropriate party. Do not provide any company or personnel contact information. Personnel contact information contained in this EOP is confidential information.

Notify Asset Management of the request for media communication. Asset Management will coordinate requests for media communication with the Asset Owner.

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 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 the Tres Bahias.

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

The Facility Lead Technician and the NovaSource 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 the Tres Bahias Generator Operator Compliance Manager, who will coordinate with the Tres Bahias 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 the Tres Bahias Generator Operator Compliance Manager, who will coordinate with the Tres Bahias Generator Owner Compliance Manager and the Asset Manager for responses.

4.6 Reliability Coordinator

The NovaSource OCC communicates with the Transmission Operator (TOP) and Qualified Scheduling Entity (QSE), as needed and in accordance with NERC and ERCOT reliability

standards and procedures. The TOP is AEP Texas Inc. and the QSE is Tenaska Power services CO Real-time operations are coordinated between the 24/7 control centers of these three entities.

The NovaSource OCC represents the Facility as a Resource Entity in ERCOT, and real-time communications to ERCOT such as outage reporting, telemetry, and verbal dispatch are directed through the QSE.

5.0 PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES

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

Item(s)	Quantity	Notes
Tarps	2	8 x 10 Super Heavy Duty 16 Mil
Battery-powered radio with NOAA weather alert tone	1	
Extension cords	2	
Flashlights and batteries	2	Forty-eight pack AA and AAA
Portable generator	1	
Fully stocked First Aid kits	2	O&M

6.0 EMERGENCY STAFFING PLAN

The NovaSource team will notify regional staff within a 2-hour dispatch to remain on call for response requirements as needed. This will include technicians assigned to the generator as well as other resources in the vicinity. Should conditions at the facility require labor beyond the capabilities of the local staff, qualified third-party resources will be engaged as well as NovaSource personnel beyond the local employees.

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 they enter the facility for the first time, and at least annually thereafter.

7.1 Annual Drill

The Facility Plant Manager will ensure that a drill of this plan occurs annually, unless a response to an actual event has occurred in the calendar year that activated this Plan. Upon completion of the drill, the Compliance Manager will provide evidence of completion. The Compliance Manager will notify PUCT staff at least 30 days before the drill with the date, time, and location of the drill.

7.2 Drill Requirements

The content of each drill will be based on current needs and will be determined by the Compliance Manager. The annual drill must include a documented evacuation of the substation control building (if applicable). A roster of drill attendees and the date of drill was conducted will be filed with this plan and retained in the Facility document repository. Any gaps or action items that are a result of the drill will be identified, resolved, fully documented, and filed with the Facility documents.

8.0 FACILITY EMERGENCY CONTACTS

The Tres Bahias 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)	(361) 553-4646
State Environmental Agency	(501) 239-1000
National Response Center (NRC)	(800) 424-8802
Regional Water Resources Board	(512) 463-7847
OSHA	(800) 321-6742
Fish & Game, Environmental Division	(888) 773-8450
Police Department	(361) 553-4646
Fire Department	(361) 552-9793

9.0 WEATHER HAZARD IDENTIFICATION AND EOP ACTIVIATION PROCEDURE

Tres Bahias 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. The NovaSource Operations and Control Center is a 24x7 staffed desk responsible for monitoring NWS alerts. The NovaSource Operations and Control Center will activate the EOP by notifying the appropriate Tres Bahias Personnel for the specified type of emergency. The procedures of this EOP, including the annexes, will be identified in the emergency communication.

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 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) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the facility at the designated location in the O&M building.

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 and ask other personnel to bring the AED to the scene. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- 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 and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring 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 and call for an AED, if required.

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

The Facility has a Fire Response Plan that describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. However, if a fire should occur at the facility, this Fire Response Plan describes the actions that should be taken by plant personnel. Safe and expedient response actions are essential to protect the health and safety of plant personnel and minimize damage to plant equipment and the surrounding environment.

NovaSource Field Operations and Safety Personnel schedule an on-site coordination meeting with local Fire and First Responders to establish expectations, cross train on safety concerns and establish expectations in preparation for a fire. They are to discuss access points, personnel points of contact and contact information including NovaSource OCC. Electrical safety, equipment voltages, currents and arc flash information, safe working distances, electrical isolation with zones of protection as appropriate are to be covered with first responders to ensure safety and develop clear expectation prior to an event.

1. Any person who discovers a fire in the facility should immediately make radio/phone contact with the Facility Lead Technician, and provide the following information:
    a. That a fire has been discovered.
    b. The location and source of the fire.
    c. Any injuries that have occurred
    d. The cause of the fire (if known)
    e. Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

    NOTE: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a plant radio. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio station to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the immediate action is to notify others over the radio and get help.
2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire should be considered to be in its incipient stage if it meets two primary criteria:
    a. The fire can be extinguished or controlled with a single portable fire extinguisher; and
    b. The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only. (Note: All plant personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility.

Fire extinguishers can locations:

a. 2- 8 lb at substation house

b. 1- 8 lb at O&M building

c. 1- 8 lb available in each work truck

No water available for fire fighting

4. In response to the fire, the Facility Lead Technician/Lead Technician will need to make the following determinations:

   a. The equipment or activities that need to be shut down and/or ceased.

   b. If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

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. It is the policy of the facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA HAZWOPER regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) **if it can be stopped without incurring additional personal exposure to the substance.** An example of this might be the following:

   Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area (if remaining within observation distance is safe under prevailing conditions; if in doubt, do not risk exposure – leave the area.).

3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Facility Lead Technician/Lead technician should be notified immediately over the radio. Information provided should include all of the following that are known:

   a. What type of chemical has been spilled/released?

   b. The location(s) of the spill/release.

   c. If the source of the spill/release has been stopped

   d. If any injuries or chemical exposure has occurred to personnel.

   e. Boundaries describing the area of the spill.

f. Whether or not the spill is contained.

g. Quantity released.

h. Environmental Impacts (water bodies, streams, ground, roadways).

4. Based upon the report from the person discovering the spill, the Facility Lead Technician/Lead Technician shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. **If a threat is imposed to the community or environment, 911 should be notified immediately.**

5. The Facility Lead Technician/Lead Technician shall decide as to whether the spill/release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the Facility Lead Technician/Lead Technician shall use the Spill Prevention Control and Countermeasure Plan (SPCC). The Facility Lead Technician shall ensure that all required notifications are made.

6. While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any plant drains that are near the location of the spill. **This should be performed only if it is safe to do so without risking chemical exposure. Spill containment equipment can be found next to the O&M building.**

7. The person discovering the spill should attempt to barricade, restrict access or otherwise mark off safe boundaries around the spill to avert others from inadvertently approaching the spill area. **This should be performed only if it is safe to do so without risking chemical exposure.**

8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.

9. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the Facility Lead Technician shall immediately proceed to the spill area to evaluate the severity of the incident. **NOTE: IF ANY PERSONNEL ARE DISCOVERED TO BE UNCONSCIOUS OR OTHERWISE INCAPACITATED UPON APPROACH TO THE SPILL SCENE, ALL PERSONNEL MUST IMMEDIATELY BACK AWAY TO A SAFE DISTANCE FROM THE UNKNOWN THREAT.**

10. The Facility Lead Technician/Lead Technician shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform). The adequacy or need for PPE should also be assessed. Upon completing this assessment, the Facility Lead Technician/Lead Technician shall notify/inform the Facility Emergency Coordinator of the status of the emergency.

11. Once the Facility Lead Technician/Lead Technician has determined that adequate containment and barricading of the spill area exists, he/she shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill. This observer shall perform radio status checks a minimum of once every three minutes until outside responders arrive for cleanup/mitigation actions.

ANNEXES

WEATHER EMERGENCY ANNEX

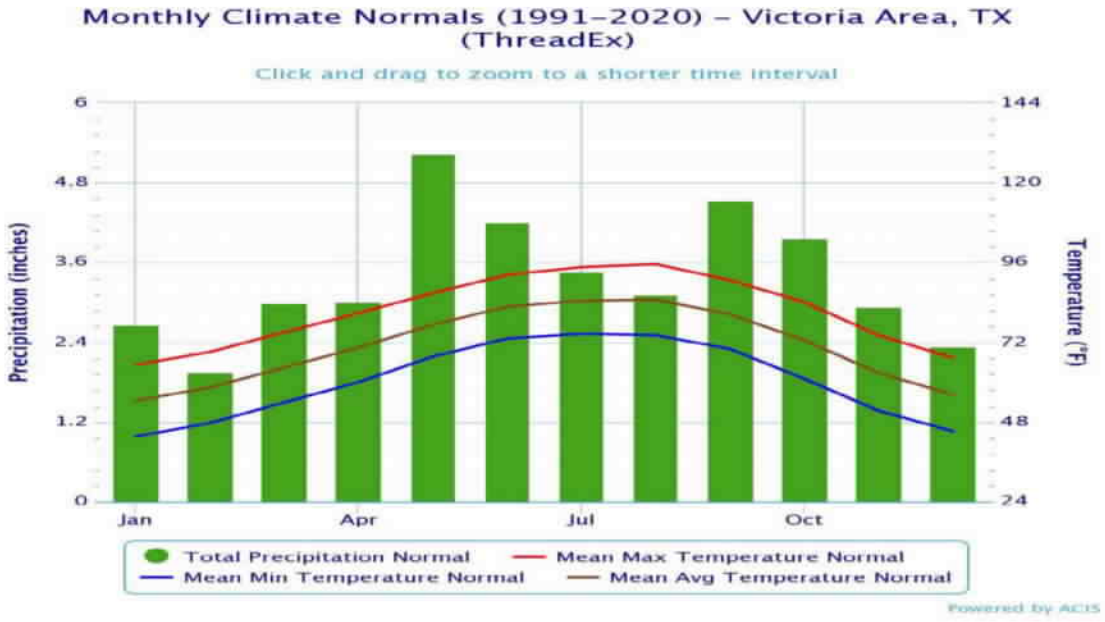
Severe weather can negatively impact the Facility. Events and disturbances that can occur in and around the facility include, but are not limited to, windstorms, severe thunderstorms, flooding, tornadoes, hurricanes, excessive heat or cold, snowstorms, and ice storms. These weather events can be detrimental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

The Facility has a design maximum ambient temperature of 140 degrees Fahrenheit and a design minimum temperature of -31 degrees Fahrenheit (inverter temperature limitation).

Victoria, Texas is used for comparison of the local Facility conditions. The lowest average low temperature during extended Winter months of November through February is 46 degrees Fahrenheit, with recorded temperatures as low as 9" degrees Fahrenheit. The greatest amount of precipitation was 9.87" inches in April of 1991.



https://www.weather.gov/wrh/Climate?wfo=maf

Event Identification

The Tres Bahias team monitors weather through multiple outlets, including National Weather Service alerts, local weather alerts, and regional entity notification distributions. When a weather emergency is identified by the Tres Bahias team, the appropriate procedure is put into effect, which includes pre-event and during event checklists to ensure safety and reliability.

Operational Plan for Cold Weather Emergency

The Tres Bahias Winter Weatherization Plan includes Appendices for seasonal readiness in accordance with §25.53, and checklists in accordance with §25.55. Prior to October 1 of each calendar year Tres Bahias Personnel or Field Services will complete the Pre-Winter Checklist. By November 1 of each calendar year, Tres Bahias or Field Services will commence Winter Season review by completing the Winter Season Review Checklist. The Pre-Event Checklist will be completed prior to the forecasted temperature reaching 30 degrees Fahrenheit or the possibility of extreme cold or severe winter weather event. Also included are Appendices related to emergency supplies and post-season lessons learned.

Training Plan for Winter Weather

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

Operational Plan for Hot Weather Emergency

The Tres Bahias Hot Weather Plan includes Appendices for seasonal readiness in accordance with §25.53, and checklists in accordance with §25.55. Prior to April 1 of each calendar year Tres Bahias Personnel or Field Services will complete the Pre-Summer Checklist. Tres Bahias personnel or Field Services will complete the ***Pre-Event** Checklist* and *Extreme **Hot Weather** Checklist* prior to the forecasted temperature reaching 100°F and/or the possibility of extreme hot weather event. This temperature reflects the people and heat stress planning needed.

Training Plan for Summer Weather

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

Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the O&M building or substation control room. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility and maintain communications with the NovaSource OCC.

Verification of the Adequacy and Operability of Fuel Switching Equipment

This component of the Weather Emergency Annex is not relevant to Tres Bahias 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

In the event of a loss of external site power, there is an automatic transfer switch that initiates backup battery power to maintain power to the site control systems. This allows the site to maintain visibility of the site until the NovaSource representative can perform a site assessment. The target response time for this scenario is two (2) hours after weather or safety conditions permit.

Restoration of service is coordinated between the OCC and ERCOT (via the QSE) using proper protocols to ensure safety and reliability. If remote capability is lost for any reason, the site can be re-energized locally after it is deemed safe to do so.

PANDEMIC AND EPIDEMIC ANNEX

Procedures related to management of a pandemic or epidemic primarily affect the Tres Bahias 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. The Generator Operator Compliance Manager is responsible for developing and training the personnel on site for disease-specific transmission protection procedures.

HURRICANE ANNEX

Hurricanes, tropical storms, and other severe weather is monitored by Tres Bahias personnel through multiple outlets. Once identified, a storm's progress is tracked to consider the severity and path of the storm. In the event a hurricane or tropical storm impact is imminent, operational preparations may be taken based on manufacturer design, including wind stow function of modules, reinforcing structures, or site de-energization.

Evacuation

If the Facility Lead Technician determines that a facility evacuation is necessary, he/she must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency, grave enough to warrant immediate evacuation of all personnel. In this type of evacuation, operating area personnel should evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible. This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

Delayed Site Evacuation

This type of evacuation would be used in a serious emergency where non- essential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility. The Facility Lead Technician and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the facility. If personnel will not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.

*NOTE: Although the Facility Lead Technician (or Facility Emergency Coordinator) may initially designate an evacuation to be a Delayed Site Evacuation, he/she should always keep in mind that conditions may change rapidly, and result in the need to call for an Immediate Site Evacuation.

The Facility Lead Technician or lead technician onsite will determine if an evacuation is necessary.

Evacuation will be coordinated via the company cell phone. Teams will be alerted if an evacuation has been directed. If an evacuation has been directed, the Facility Lead Technician shall ensure that instructions for evacuation are communicated to personnel over

the plant radio system or hand-held radios. These instructions should include the following items at a minimum:

- The type of evacuation to be performed
- Immediate Site Evacuation
- Delayed Site Evacuation
- The nature of the emergency
- The location(s) of the emergency
- Any egress routes that should not be used by evacuating personnel (if known and applicable)

If an evacuation has been ordered, personnel shall follow either the Immediate Site Evacuation Procedures or Delayed Site Evacuation Procedures contained in Appendix 4, as appropriate, and based upon the direction of the Facility Lead Technician and/or Facility Emergency Coordinator.

Immediate Site Evacuation Procedure

1. Personnel present on-site at the O&M Building shall immediately take the following actions:
    a. Locate and obtain the visitor/contractor sign-in sheet.
    b. Locate and obtain all immediately accessible hand-held radios.
    c. Gather at the front entrance gate at facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Appendix 3).

        *NOTE: The primary muster area must be a predetermined location, with any alternate muster areas selected only when egress routes to the primary muster area are unsafe to proceed along.

    d. Pass the following information over the plant radio system:
        i. The muster area the employees will be proceeding to.
        ii. Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).
    e. Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area. Personnel on-site should not delay in evacuating or wait on other personnel that they anticipate may arrive.
    f. Upon arriving at the designated muster area, the group shall designate a Person- in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.
    g. After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for. The Person-in-Charge will then query by radio for personnel for whom are unaccounted. The Person-in-Charge shall then establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel for whom are not accounted.
    h. All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location. The "ALL CLEAR" signal will be communicated by radio

or cellular telephone.

i. The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.

2. Personnel present in the field/substation area (other than the O&M Building) shall immediately perform the following actions:

   a. If not monitoring the plant radio system, immediately turn on hand-held radios.

   b. Proceed to the designated muster area unless the egress route to the muster area is not safe for travel. In such a case, proceed to an alternate muster area.

   c. Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated muster area.

   d. Upon reaching the appropriate muster area, report to the Person-in-Charge and continue to monitor the plant radio system. If no other personnel are present at the muster area upon arrival, communicate to the Facility Lead Technician that no other personnel are present in the area.

3. Personnel not in the operating areas of the plant (to include the O&M building and parking areas) shall immediately perform the following actions:

   a. Locate and obtain all immediately accessible hand-held radios.

   b. Proceed to the designated muster area.

   c. A Person-in-Charge shall be designated for the muster area. In many cases, this will be the Emergency Coordinator. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

   d. If the Emergency Coordinator is not present at the muster area, the Person-in- Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives. In the event that the Emergency Coordinator is in plant operating areas or has proceeded to the alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency.

Delayed Site Evacuation Procedures

1. Personnel present on-site at the O&M building shall immediately take the following actions:

   a. Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.

   b. Locate and obtain the visitor/contractor sign-in sheet.

   c. Communicate names of visitors/contractors currently in the operating areas to outside operating personnel. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.

   d. When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the O&M building, the Facility Lead Technician or Emergency Coordinator, as appropriate shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route.

e. Notify the Emergency Coordinator of the current facility status, and evacuation details.

f. Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.

g. Once the shutdown has been completed, all essential personnel shall gather in the O&M and take roll call. When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel. In such a case, proceed to the alternate muster area.

2. Personnel present in the field/substation area (other than the O&M building) shall immediately perform the following actions:

   a. Continuously monitor the radio system for information and instructions.

   b. Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.

   c. Locate and direct non-essential personnel to proceed to the O&M building immediately.

   d. Perform facility shutdown instructions as directed by the Facility Lead Technician/Lead technician.

   e. Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the muster point for instructions.

3. Personnel not in the operating areas of the facility (to include the O&M building and parking areas) shall immediately perform the following actions:

   a. Locate and obtain all immediately accessible hand-held radios. (b) Proceed to the designated muster area (see Site Map).

   b. A Person-in-Charge shall be designated for the muster area. The Person-in- Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

   c. The Person-in-Charge at the designated muster area will coordinate outside responding agency activities and aid (to include personnel, resources, and administrative functions) to the O&M building as directed by the Emergency Coordinator and/or Facility Lead Technician/Lead technician.

4. The Emergency Coordinator shall immediately perform the following actions:

   a. Proceed to the O&M building or to the location on the facility most appropriate for directing response actions for the emergency.

   b. Coordinate actions related to the emergency and provided directions to muster area.

5. Persons-in-Charge

   a. In the event that the emergency escalates in severity or immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

- The Designated Muster Area is the primary gathering point for personnel and should be used during evacuations unless the emergency has rendered egress routes to the Muster Area unsafe for travel.
- The Alternate Muster Area is the alternate gathering point for such circumstances.
- Alternate muster location will be communicated at the time of evacuation and will take into consideration the event occurring that is causing the evacuation.

Primary Muster Area	Main gate entrance off FM2143
Alternate Muster Area	Onsite for emergency food

Re-Entry Procedures

Facility personnel will review site re-entry procedures with the Facility Lead. Facility personnel should tour the site grounds to observe hazards including:

- Compromised O&M Building integrity
- Compromised Substation Control room integrity
- Panels pulled from tracker racking from wind forces
- Foreign debris washed against the fence line
- Water driven Erosion of site roads, substation grade, and inverter pads

CYBERSECURITY ANNEX

Cybersecurity is managed according to the NERC CIP procedures administered by the Generator Owner Compliance Manager. The Generator Owner Compliance program includes administered network security, including firewall monitoring, VPN controls, and network security. Tres Bahias Personnel receive separate training on the NERC procedure. Additionally, the Generator Operator Compliance Manager provides additional training on the use of transient cyber assets.

PHYSICAL SECURITY ANNEX

Objectives for Physical Security Controls

Tres Bahias has selected a set of operational, procedural and/or technical security controls to control physical access, based on its need, to both:

a. The asset or locations of its low impact BES Cyber Systems within the asset at the Facility; and

b. The documented electronic access controls specified in its *Electronic Access Controls Plan.*

Facility Physical Security Controls

Tres Bahias employs the following site perimeter controls.

a. A clearly identifiable physical perimeter surrounds the Facility or Facilities.

b. The perimeter fencing has posted "Danger - High Voltage, Keep Out" signage.

c. Gates in the perimeter fencing are kept locked.

Tres Bahias employs the following procedural controls.

a. Personnel are expected to, at a minimum:

- Notify the (GOP) OCC prior to entering the substation control building and receive permission to enter.
- Only enter areas they have authorization to enter.
- Close and lock gates, doors, and cabinets behind them, as appropriate; and
- Report suspicious activity.

All electronic access controls for Tres Bahias's low impact BES Cyber Systems are contained within the substation control building or in cabinets with bolted- doors within the Facility perimeter.

Tres Bahias employs the following physical access controls.

d. The following physical access controls are employed at the substation control building:

- Door contacts that are alarmed via SCADA.
- Lock to the substation yard.
- Lock to the substation house.

e. The following access controls are employed at the O&M building:

- Lock to the O&M building

APPROVALS

Title	Approval
Compliance Program Manager	Approval on file in corporate repository
Swift Current Energy	Approval on file in corporate repository

ATTACHMENT 1: TRES BAHIAS CRITICAL COMPONENT MATRIX

Extreme cold or severe winter weather conditions can impact the performance of generation facilities. Freezing temperatures can have an adverse impact on electronic and oil-filled equipment, as they are highly impacted by ambient temperatures. Voltage, current, and temperature readings can drift when sensitive equipment attempts to function outside of their normal operating range. Snow accumulation may place stress on the BESS system's structures.

This critical equipment matrix identifies all components necessary to operate the facility during extreme cold weather conditions.

Tres Bahias Critical Equipment				
Item #	**Description (Manufacturer and Model)**	**Quantity**	**Weather Protections**	**Weather Design Limits**
1.	52-T1 - Siemens SPS2S-145-40-2000 Circuit Breaker	One (1)	SF_6 Gas Filled Equipment	Operating temperature range -30 °C (-22 °F) to +55 °C (131 °F)[2]
2.	T1 - HICO Main Power Transformer 138-34.5 kV, 126/168/210 MVA (ONAN/ONAF/ONAF), with multi-ratio bushing current transformers	One (1)	Mineral oil filled equipment	65 °C rise above ambient temperature.[3]
3.	52-F1/F2/F3/F4/F5 - Siemens SDV7-SE 34.5kV Feeder Circuit Breakers	Five (5)	Vacuum	Operating temperature range -20 °C (-4 °F) to +50 °C (122 °F)[4]
4.	Substation Control House HVAC – 4 Ton MARVAIR Wall Mount	Two (2)		Operating temperature range -18 °C (0 °F) to +55 °C (131 °F)[5]

ATTACHMENT 2: COLD WEATHER EQUIPMENT INVENTORY

Date inventory completed	
Completed by Field Services Site Manager or Designee	

Item #	Description	Model # (if req.)	Qty. Required	Qty. On Hand	Notes
1.	Tarps				
2.	Battery-powered radio with National Oceanic and Atmospheric Administration (NOAA) weather radio with tone alert				
3.	Extension cords				
4.	Flashlights and batteries				
5.	Potable water supply				
6.	Fully stocked First Aid kits				
7.	Verify adequate inventory of spare parts for reliable operation of the facility during winter season				
8.					
9.					
10.					
11.					

ATTACHMENT 3: PRE-WINTER CHECKLIST – DUE BY OCTOBER 1 ANNUALLY

Date performed	
Completed by (name)	

	Pre-Winter Checks **Instructions**: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed.
☐	Complete and submit the *Winter Weather Equipment Inventory*.
☐	Review any industry best practices or lessons learned from the previous winter season. Make updates to this annex, as needed.
☐	Conduct annual winter readiness training and drill with all Field Services personnel. Utilize and follow the annex during the training and drill.
☐	Collect Field Services feedback on the EOP (if any) and, without unnecessary delay, provide Compliance Manager so they can update and submit the Plan to ERCOT within the required timeframe (by October 1).
☐	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme cold or severe cold weather event, including but not limited to scheduling and performing winter-related (e.g. check SF-6 gas pressure levels, transformer oil levels, wind breaks in place, insulation, enclosures and waterproofing in good working order) maintenance prior to the beginning of winter and increasing surveillance during extreme cold or severe winter weather events by scheduling tasks in the work management system.
☐	Ensure all persons coming to site have PPE consistent with expected weather conditions. (e.g., gators, rain gear, thermal layers, baklavas etc.)
☐	Review work orders for cold weather preparedness preventative work to confirm they are scheduled for completion, as needed, prior to the onset of the winter season.
☐	Notify Tres Bahias Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete winter weatherization.

ATTACHMENT 4: MONTHLY TESTING AND VEIFICATION OF FREEZE PROTECTION CHECKLIST

Critical Equipment Matrix COMPONENTS NECESSARY TO OPERATE THE FACILITY DURING COLD WEATHER CONDITIONS					
Item#	**Description (Manufacturer and Model)**	**Quantity**	**Verify/ Test**	**Weather Design Limits**	**Monthly Check Satisfactory?**
	Example: *Siemens Type SPS2-145kV Circuit Breaker*	*4*	*Verify*	*Cabinet closes properly*	☐ Yes ☐ No WO #
	Example: *Siemens Type SPS2-145kV Circuit Breaker*	*4*	*Test*	*Operation of cabinet heaters*	☐ Yes ☐ No WO #
1					☐ Yes ☐ No WO #
2					☐ Yes ☐ No WO #
3					☐ Yes ☐ No WO #
4					☐ Yes ☐ No WO #
5					☐ Yes ☐ No WO #
6					☐ Yes ☐ No WO #
7					☐ Yes ☐ No WO #
8					☐ Yes ☐ No WO #
9					☐ Yes ☐ No WO #
10					☐ Yes ☐ No WO #

11					☐ Yes ☐ No WO #
12					☐ Yes ☐ No WO #
13					☐ Yes ☐ No WO #
14					☐ Yes ☐ No WO #
15					☐ Yes ☐ No WO #
16					☐ Yes ☐ No WO #
17					☐ Yes ☐ No WO #
18					☐ Yes ☐ No WO #
19					☐ Yes ☐ No WO #
20					☐ Yes ☐ No WO #

ATTACHMENT 5: PRE-EVENT CHECKLIST

Date performed	
Completed by (name)	

Pre-Event Checklist **Instructions**: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed.	
☐	Monitor weather and weather alerts. Note in shift logs when a winter weather advisory has been issued, and subsequently recalled or released.
☐	Place severe weather protections in service where extreme cold or severe or freezing winter weather could adversely impact Personnel, operations, or forced outage recovery.
☐	Establish communications with Operating Personnel on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
☐	Verify appropriate cold weather PPE for field personnel.
☐	Establish staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
☐	Monitor temperatures and take action to limit or prevent impact reliability impacts to instrumentation and equipment due to extreme cold.
☐	Field Services Site Manager to schedule and conduct meeting to discuss the weather forecast at the beginning of each shift during shift turnover and to keep all personnel alerted to weather conditions.

ATTACHMENT 6: EXTREME COLD OR SEVERE WEATHER CHECKLIST

ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES IMMEDIATELY FOR ASSESSMENT

Date performed	
Completed by (name)	

Extreme Cold or Severe Winter Weather Checklist **Instructions:** Answer each item and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed			
Item #	**Item**	**Complete? Yes, No, or N/A**	**Notes Include any follow-up activity required.**
1	Review work order system to ensure adequate annual preventative work orders exist for freeze protection and winter weather preparations.		
2	Perform necessary and immediate work needed to protect the facility.		
3	Establish and document staff responsibilities to monitor weather and weather alerts.		
4	Establish and document a communications plan with the TEMS Operating Personnel.		
5	Ensure all critical equipment is operating and protected per the manufacturer's recommendations during extreme cold or severe winter weather events. Emphasize the points at the facility where freezing can occur (e.g., building piping, heat tracer piping).		
6	Develop a list of critical equipment and transmitters that require increased surveillance during extreme cold or severe Winter weather events. Refer to **Critical Equipment Matrix** attachment 1.		
7	Consider the effect of wind chill when applying freeze protection, including checking insulation thickness, quality, and proper installation.		
8	Inspect building entrances, windows, fan louvers, and other openings for potential exposure of critical equipment to the elements.		
9	Check equipment inventory and replenish all quantities. Refer to **Winter Weather Equipment Inventory** attachment. Be sure to check all First Aid kits and confirm PPE "in use" dates.		

ATTACHMENT 7: TRES BAHIAS CRITICAL COMPONENT MATRIX

Extreme hot weather conditions can impact performance of the facility. Extended periods of high temperatures can place stress on the equipment and could limit the capabilities of plant production. This critical equipment matrix identifies all components necessary to operate the plant during hot weather conditions.

Tres Bahias Critical Equipment				
Item #	**Description (Manufacturer and Model)**	**Quantity**	**Weather Protections**	**Weather Design Limits**
1.	52-T1 - Siemens SPS2S-145-40-2000 Circuit Breaker	One (1)	SF_6 Gas Filled Equipment	Operating temperature range -30 °C (-22 °F) to +55 °C (131 °F)[2]
2.	T1 - HICO Main Power Transformer 138-34.5 kV, 126/168/210 MVA (ONAN/ONAF/ONAF), with multi-ratio bushing current transformers	One (1)	Mineral oil filled equipment	65 °C rise above ambient temperature.[3]
3.	52-F1/F2/F3/F4/F5 - Siemens SDV7-SE 34.5kV Feeder Circuit Breakers	Five (5)	Vacuum	Operating temperature range -20 °C (-4 °F) to +50 °C (122 °F)[4]
4.	Substation Control House HVAC – 4 Ton MARVAIR Wall Mount	Two (2)		Operating temperature range -18 °C (0 °F) to +55 °C (131 °F)[5]

ATTACHMENT 8: HOT WEATHER EQUIPMENT INVENTORY

Date inventory completed	
Completed by Field Services Site Manager or Designee	

Item #	Description	Qty. Required	Qty. On Hand	Notes
12.	Tarps			
13.	Battery-powered radio with National Oceanic and Atmospheric Administration (NOAA) weather radio with tone alert			
14.	Extension cords			
15.	Flashlights and batteries			
16.	Potable water supply			
17.	Hot weather gear that is compatible with PPE (e.g., sunscreen, PPE is covered in Attachment 5).			
18.	Fully stocked First Aid kits			
19.	Verify adequate inventory of spare parts for reliable operation of the plant during summer season			

ATTACHMENT 9: PRE-SUMMER CHECKLIST – DUE BY APRIL 1 ANNUALLY

Date performed	
Completed by (name)	

	Pre-Summer Checks **Instructions**: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed.
☐	Complete and submit the *Extreme Hot Weather Equipment Inventory*.
☐	Review the *Hurricane Annex* and update.
☐	Review any industry best practices or lessons learned from the previous summer season.
☐	Conduct annual extreme hot weather readiness training, *Hurricane Annex* and EOP drill with relevant operating personnel. Utilize and follow the annex(es) during the training and drill. Collect Field Services feedback on EOP (if any) and, without unnecessary delay, provide Compliance Manager.
☐	Collect Field Services feedback on the EOP, *Hot Weather Annex and Hurricane Annex* (if any) and, without unnecessary delay, provide Compliance Manager so they can update and submit the Plan to ERCOT within the required timeframe (by June 1).
☐	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme hot weather event, including but not limited to scheduling and performing maintenance prior to the beginning of summer and increasing surveillance during extreme hot weather events by scheduling tasks in the work management system.
☐	Review work orders for hot weather preparedness preventative work to confirm they are scheduled for completion, as needed, prior to the onset of the summer season.
☐	Ensure all persons coming to site have PPE consistent with expected weather conditions. (e.g., moisture wicking FR gear, cooling vests if required, FR bandanas)
☐	Notify the Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete summer weatherization.

ATTACHMENT 10: MONTHLY TESTING AND VEIFICATION OF HOT WEATHER PROTECTION CHECKLIST

Critical Equipment Matrix COMPONENTS NECESSARY TO OPERATE THE FACILITY DURING HOT WEATHER CONDITIONS					
Item#	**Description (Manufacturer and Model)**	**Quantity**	**Verify/ Test**	**Weather Design Limits**	**Monthly Check Satisfactory?**
	Example: *Siemens Type SPS2-145kV Circuit Breaker*	*4*	*Verify*	*Cabinet closes properly*	☐ Yes ☐ No WO #
	Example: *Siemens Type SPS2-145kV Circuit Breaker*	*4*	*Test*	*Operation of cabinet cooling fans*	☐ Yes ☐ No WO #
Note: If the facility includes or is a battery storage facility, the HVAC unit(s) in the battery container need to be listed as critical equipment.					
1					☐ Yes ☐ No WO #
2					☐ Yes ☐ No WO #
3					☐ Yes ☐ No WO #
4					☐ Yes ☐ No WO #
5					☐ Yes ☐ No WO #
6					☐ Yes ☐ No WO #

ATTACHMENT 11: PRE-EVENT AND EXTREME HEAT CHECKLIST

Date performed	
Completed by (name)	

	Pre-Event Checklist **Instructions**: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed.
☐	Monitor weather and weather alerts. Note in shift logs when a summer weather advisory has been issued, and subsequently recalled or released.
☐	For forecasted hurricane and tropical storm events, refer to the *Hurricane Annex*.
☐	Place severe weather protections in service where extreme hot weather could adversely impact Personnel, operations, or forced outage recovery (can include severe thunderstorms or monsoonal flooding).
☐	Establish communications with TEMS Operating Personnel on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
☐	Review staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
☐	Monitor temperatures and take action to limit or prevent impact to instrumentation and equipment due to extreme heat.
☐	Field Services Site Manager to schedule and conduct meeting with field personnel to discuss the weather forecast to keep all personnel alerted to weather conditions.

ATTACHMENT 12: EXTREME HOT WEATHER CHECKLIST

ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES IMMEDIATELY FOR

Date performed	
Completed by (name)	

Extreme Hot Weather Checklist

Instructions: Answer each item and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed

Item #	Item	Complete? Yes, No, or N/A	Notes Include any follow-up activity required.
1	Review outstanding preventative work orders and perform necessary and immediate work needed to protect the facility (e.g., weed abatement, fire prevention activities, flood preparation).		
1	Establish staff responsibilities to monitor weather and weather alerts.		
1	Establish a communications plan with the TEMS Operating Personnel including notification to Operating Personnel of potential plan outage, shutdown, or curtailment.		
1	Check that all critical equipment is operating and protected per the manufacturer's recommendations during extreme hot weather events. Emphasize the points at the facility where weed abatement and fire safety are necessary to protect critical equipment.		
1	Refer to **Critical Equipment Matrix** (Attachment 7) and plan preventative and response actions based on forecasted conditions, which should include notifications to Personnel.		
1	Monitor and address any bird or animal nesting in or around the high voltage substation.		
1	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements checking insulation thickness, quality, and proper installation, building entrances, windows, etc.).		
1	Check equipment inventory and replenish all quantities. Refer to Extreme **Hot Weather Equipment Inventory** attachment. Be sure to check all First Aid kits and confirm PPE "in use" dates.		