



## Filing Receipt

**Received - 2022-04-15 03:42:23 PM**  
**Control Number - 53385**  
**ItemNumber - 169**

**Griffin Trail Wind, LLC**  
**Emergency Operations Plan**

(PUCT Substantive Rule §25.53: Electric Service Emergency Operations Plans)

Version Control			
Version #	Date	Content	Action By
01	01-Jun-21	Published version	SP/MA/MC/CL
02	15-Mar-22	Draft revision to new Order 25.53 requirements	SP/CL

Revision Statement: Version 02 of the Griffin Trail Wind, LLC Emergency Operations Plan dated March 15, 2022, supersedes Version 01 dated June 1, 2021.

## Background and Summary

Griffin Trail Wind, LLC (“GTW”) is a 225.6 MW wind energy generating facility located in Knox and Baylor County, the nearest town being Vera, Texas. GTW consists of 80 GE model 2.82-127 wind turbines each with a rated capacity of 2.82 MW. GTW also includes an operations and maintenance (O&M) building, substation line and associated infrastructure. GTW will interconnect at the 345 kV Avagrado Switching Station owned by American Electric Power (“AEP”). GTW is within the Electric Reliability Council of Texas (“ERCOT”) region.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## Purpose

This suite of documents has been developed by GTW to provide the facility with a comprehensive Emergency Operations Plan (EOP) and to ensure compliance with Chapter 25 of the Public Utilities Commission of Texas (“PUCT”), Substantive Rules Applicable to Electric Service Providers, Subchapter C Infrastructure and Reliability, §25.53 Electric Service Emergency Operations Plans, Project No. 51841.

GTW is defined below as a Power Generation Company per PUCT Order §25.5(82).

Power Generation Company (“PGC”) A person that:

- a. generates electricity that is intended to be sold at wholesale, including the owner or operator of electric energy storage equipment or facilities.
- b. does not own a transmission or distribution facility in this state, other than an essential interconnecting facility, a facility not dedicated to public use, or a facility otherwise excluded from the definition of “electric utility” under this section; and
- c. does not have a certificated service area, although its affiliated electric utility or transmission and distribution utility may have a certificated service area.

As GTW is a registered PGC with the PUCT the requirements of §25.53 Electric Service Emergency Operations Plans are deemed applicable. This Emergency Operations Plan has been developed for the benefit of the Griffin Trail Wind facility and has been filed as per the requirements stated in §25.53(c).

## Emergency Operations Plan Activation Process

The GTW Emergency Operations Plan comprises of several Appendices and supporting attachments. It should be understood that some elements of the Emergency Operations Plan can function independently, and the Emergency Operations Plan in its entirety may not be required to be followed in all cases.

The GTW Emergency Operations Plan shall be activated on the outset of an emergency event.

An emergency event is defined in PUCT Order §25.53(b)(3) as, “a situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.”

An emergency event could be a situation that impacts the on-site team, the public, our ability to generate power, the surrounding ecosystem, our facility as a whole or members of the community. These situations include operational, environmental (weather related), political, reputational, and commercial issues as well as pandemic and major information technology and cybersecurity incidents.

Irrespective of the nature of the emergency event, in all cases, the Communications Plan (see Appendix B) shall be followed as a priority to ensure that all internal and external stakeholders are informed. It will then be the responsibility of the Site Manager (please see below Responsibilities section) to implement the plans and designate responsibilities on site as appropriate.

To Note: Individual safety shall at all times take priority over this Activation Process and that in some instances it may be that a situation is resolved prior to the processes as outlined in this Emergency Operations Plan taking place.

## Responsibilities - §25.53(d)(1)(B)

- a. The Reliability Compliance Expert has overall responsibility for the development and revision of the Emergency Operations Plan (EOP).
- b. The Site Manager, or designee, has overall responsibility for the implementation of the emergency plans and for assigning the title and associated responsibilities of Emergency Coordinator to an employee to adequately cover all periods when the facility is occupied.
- c. The Site Manager is responsible for execution of these plans.
- d. The Site Manager is responsible for annual drills; ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan.
- e. The Site Manager shall designate an Emergency Coordinator if the emergency requires personnel to evacuate. [REDACTED]  
[REDACTED]
- f. In the absence of the Site Manager, refer to Appendix N, Emergency Contacts to determine who will be the Secondary Contact/Interim Manager until further notice and shall account for all operation and maintenance (“O&M”) personnel on-site. A sign-in sheet is available for contractors and site visitors.
- g. The Emergency Coordinator shall maintain phone or radio communication with the Site Manager and communicate the count of all evacuated, site and contract personnel.

- h. All personnel will be trained regarding fire routes, exits, storm shelters, the location and use of emergency equipment, and understanding and following these plans. All personnel who have contractors or visitors at the site shall ensure that they are aware of the plans through site orientation.

### Plan Elements - §25.53 (c)(1)(A)(i)(a)

The GTW Emergency Operations Plan ("EOP") for the Griffin Trail Wind site consists of the following elements as outlined in §25.53 Electric Service Emergency Operations Plans.

1. Communications plan – §25.53(d)(2)  
See Appendix B, Communications Plan.
2. Plan to maintain pre-identified supplies for emergency response – §25.53(d)(3):  
See Appendix C, Emergency Supplies.
3. Staffing during emergency response plan – §25.53(d)(4):  
See Appendix D, Emergency Staffing Plan.
4. Weather emergency and weather-related hazard identification plan – §25.53(e)(2)(A) and (d)(5):  
See Appendix E, Weather Emergency Plan.
5. Water shortage plan – §25.53(e)(2)(B):  
See Appendix F, Water Shortage Plan.
6. Restoration of service and business continuity plan – §25.53(e)(2)(C) and (c)(4)(C)(v):  
See Appendix G, Operations Restoration Plan.
7. Pandemic and epidemic preparedness plan – §25.53(e)(2)(D):  
See Appendix H, Communicable Disease Prevention Plan.
8. Hurricane plan – §25.53(e)(2)(E):  
See Appendix I, Hurricane Plan.
9. Site evacuation plan - §25.53(e)(2)(H):  
See Appendix J, Site Evacuation Plan.
10. Cyber and physical security response plan – §25.53(e)(2)(F) and (G)  
See Appendix K, Cyber and Physical Security Response Plan.
11. Drills – §25.53(f):  
Please see Appendix L, Drills Process.

12. Record of distribution and training - §25.53(c)(4)(A):  
Please see Appendix M, Record of Distribution and Training for a list of the persons in the organization who have access to and have received training on this EOP.
13. Emergency contact information – §25.53(c)(4)(B):  
Please see Appendix N, Emergency Contacts. If there is a change in emergency contacts for GTW, the applicable changes shall be made in the EOP and subsequently be submitted to PUCT.
14. Reporting requirements - §25.53(g):  
Upon request by PUCT staff during an activation of the State Operations Center Public Works Response Team, GTW will provide updates to designated PUCT representatives on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by PUCT. After an emergency event declared by the Governor of the State of Texas or the President of the United States of America, GTW may be required to file an After Action or Lessons Learned document with PUCT.
15. Annual review - §25.53(c)(3):  
This plan shall be reviewed not less than annually no later than March 15 to confirm it is up to date. If any change materially affects how the entity would respond to an emergency, GTW will file with PUCT an executive summary that does the following:
  - Describes the changes to the contents or policies contained in the EOP.
  - Includes an updated reference to specific sections and page numbers of the entity's EOP.
  - Includes the record of distribution required (Number 14)
  - Contains the affidavit (Appendix A)

Additionally, a revised copy of the updated EOP with all confidential portions removed will be filed with PUCT and a revised unredacted copy of the updated EOP will be submitted to ERCOT.

#### **No Material Changes**

If no material changes are made to the EOP, GTW will file the following with PUCT:

- A pleading that documents any changes to the list of emergency contacts.
- An attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency.
- The affidavit in Appendix A.

Notification to PUCT staff regarding changes to its emergency contact information shall be made as soon as possible.

16. Affidavit– PUCT §25.53(c)(4)(C):  
Please see Appendix A, Affidavit for Compliance.

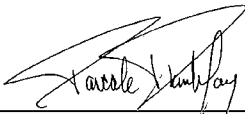
## Appendix A: Affidavit for Compliance

### Resource Entity: GRIFFIN TRAIL WIND, LLC

#### Affidavit for Compliance PUCT §25.53(c)(4)(C)

As the highest-ranking representative with binding authority over the Resource Entity identified above, I confirm the following:

- I. that all relevant operating personnel at Griffin Trail Wind, LLC are familiar with the and have received training on the applicable contents and execution of the EOP,
- II. that the EOP has been reviewed and approved by the appropriate executives,
- III. that the drills shall be carried out as per the documented process
- IV. that appropriate sections of the EOP shall be distributed to the Region 5 Texas Division of Emergency Management District Coordinators,
- V. that Griffin Trail Wind, LLC maintains an operations continuity plan (see Appendix G),
- VI. that the Griffin Trail Wind, LLC Site Manager (the entity designated emergency management personnel designated to interact with local, state, and federal emergency events) has received the latest IS-100, IS-200, IS-700 and IS-800 National Incident Management System training (see Appendix M).



---

Pascale Tremblay  
Chief Asset Officer  
Innergex Renewable Energy Inc.

April 14, 2022

---

Date

**Griffin Trail Wind, LLC**

**Communications Plan**

§25.53 (d)(2)(B)

Version Control			
Version	Date	Content	Action By
01	14-Mar-22	Original Version	SP/CL



## Table of Contents

1	Definitions .....	3
2	Introduction .....	3
3	Procedure.....	3
3.1	Internal Communications.....	3
3.1.1	Emergency Contacts.....	3
3.1.2	Crisis Management Team .....	5
3.2	External Communications .....	5
	Attachment B.1 – EHS1006 Corporate Emergency Management Guide.....	6

## 1 Definitions

- Emergency As defined in PUCT Order §25.53(b)(3)  
*“a situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by a local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.”*
- ERCOT Electricity Reliability Council of Texas
- GTW Griffin Trail Wind, LLC

## 2 Introduction

This plan outlines the requirements at GTW to ensure clear communications in the instance of an emergency event.

Innergex Renewable Energy Inc. maintains a corporate Emergency Management Guide (EHS1006-03, see Attachment B.1). This Communications Plan draws heavily from the directives given in the EHS1006 in relation to the corporate communications protocols and engagement of the Innergex Crisis Management Team.

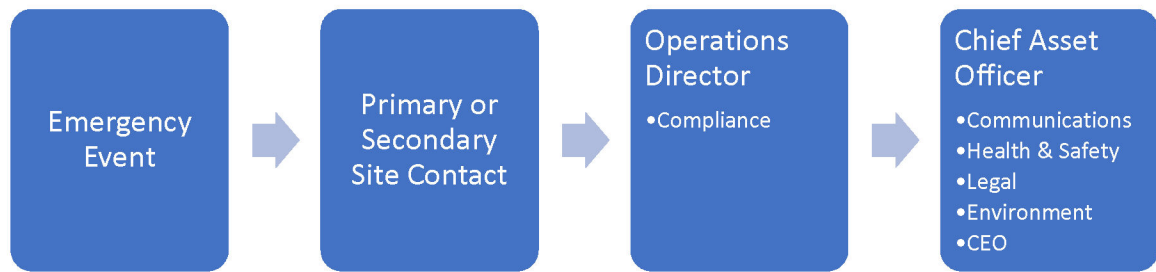
## 3 Procedure

### 3.1 Internal Communications

#### 3.1.1 Emergency Contacts

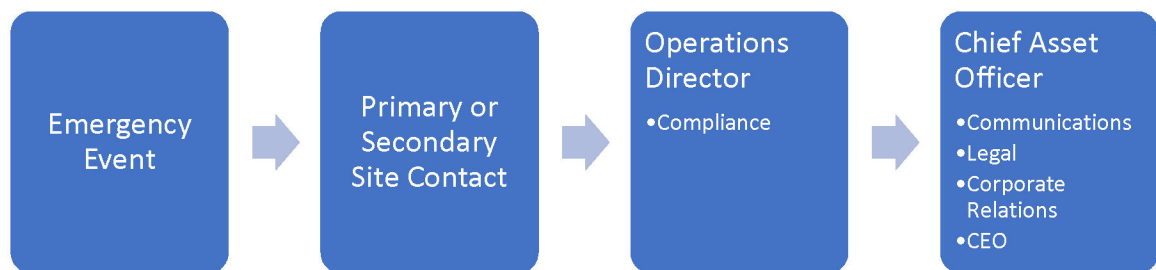
GTW maintains an emergency contact list (see Appendix N), which is reviewed on an annual basis. This list shows a primary and designates a secondary site contact, in most cases the primary contact will be the Site Manager. Irrespective of the nature of the emergency event, as soon as everyone’s safety is ensured, the emergency event must be reported to the designated primary, or if they cannot be reached the secondary, site emergency contact. It is then the responsibility of that individual to report the situation immediately to the Operations Director who will in turn report the situation to the Chief Asset Officer. The Chief Asset Officer must then inform Communications, Health & Safety, Legal, Environment and the CEO. It will then be the responsibility of these representatives to assess the emergency event to determine if the situation requires oversight by the Crisis Management Team.

Diagram 1: Internal Communications Flow - General



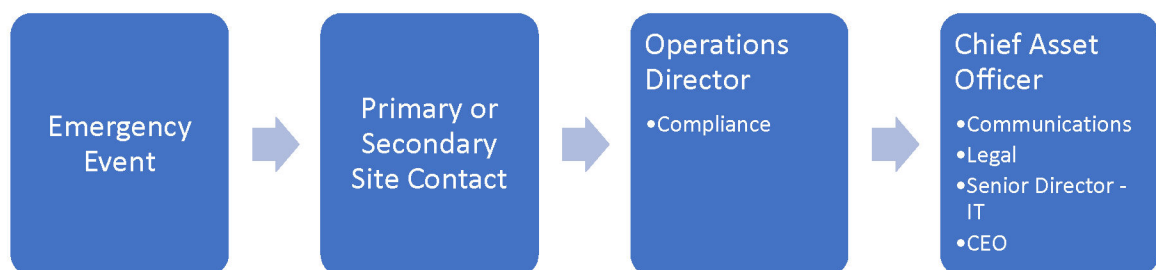
Should the emergency event concern a political, reputational, or commercial situation the following communications pathway should be followed.

Diagram 2: Internal Communications Flow – Geopolitical



Should the emergency event have an impact on information technology and or cybersecurity the Senior Director – Information Technologies must also be informed.

Diagram 3: Internal Communications Flow – Cybersecurity/Information Technology



It should be always noted that the safety of the individuals on site shall take priority over the communications process.

### 3.1.2 Crisis Management Team

Attachment B.1 of EHS1006-03 details the Crisis Assessment Process to be used to evaluate the process and decide as to whether the Crisis Management Team must be convened. The Chief Asset Officer will lead the Assessment Process.

## 3.2 External Communications

All external communications shall be verified by the Innergex Renewable Energy Inc.

Communications team ([communications@innergex.com](mailto:communications@innergex.com)) prior to any statements being released.

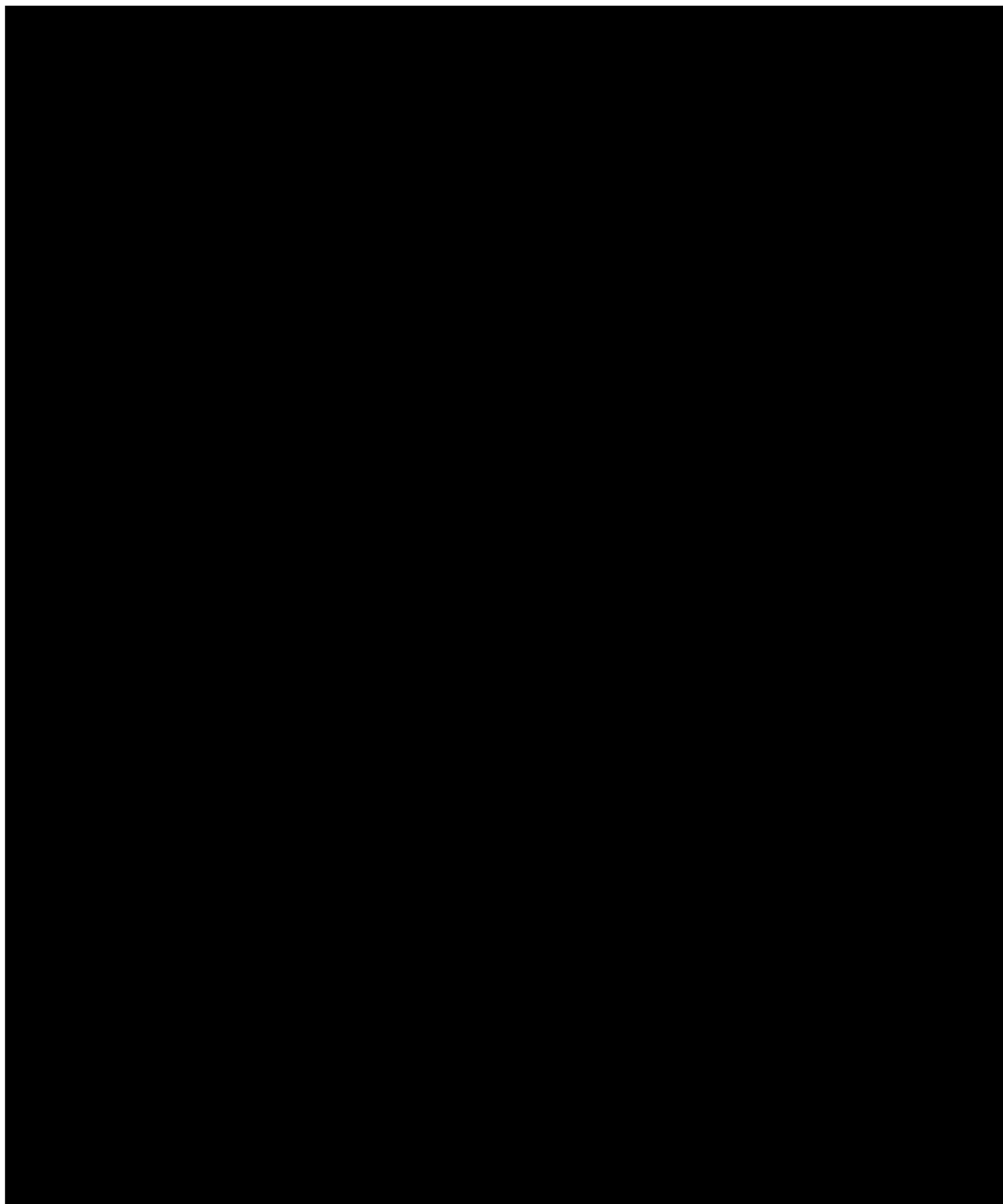
During an emergency event it is the role of Communications to develop key messages to be shared with the on-site team. Communications will take responsibility for the following tasks:

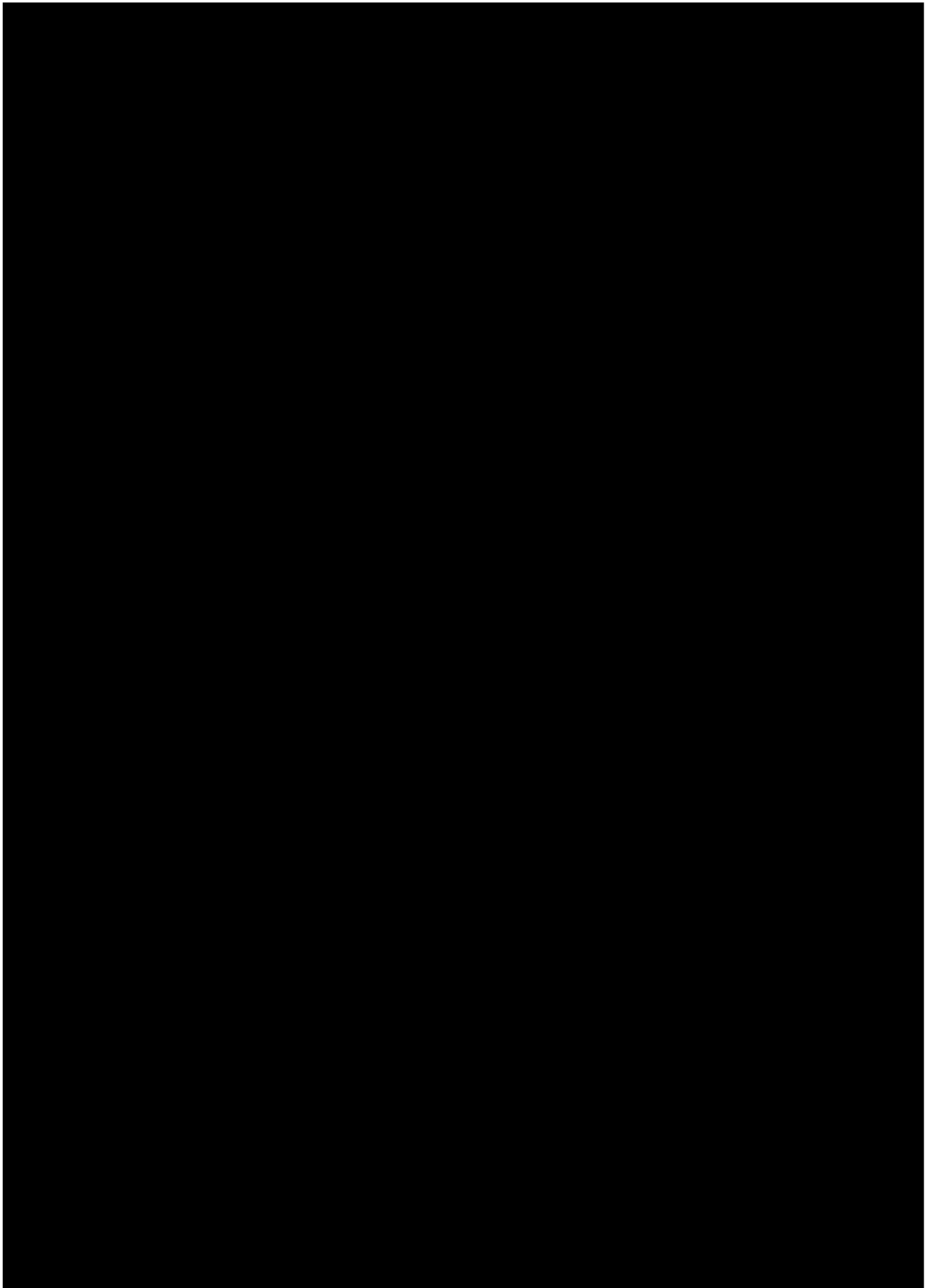
- Assessing media and social media emergency event potential and determine what response approach should be taken.
- Identifying local and regional media outlets.
- Receiving all media requests regarding the emergency event.
- Supporting a local designated spokesperson (should one need to be designated).
- Coordinating the Innergex Crisis Management Team calls.
- Ensuring all Innergex receptionists are notified of the emergency event and response process when answering calls.
- Collaborating with Corporate Relations and landowner communications.
- Monitoring the news and social media live.
- Preparing a press release.
- Preparing an internal message for employees
- Making the decision as to whether a press conference is needed or if a video response is required (for social media).
- Determining the post-emergency event communications plan.

## Attachment B.1 – EHS1006 Corporate Emergency Management Guide

# **EMERGENCY RESPONSE PLAN**

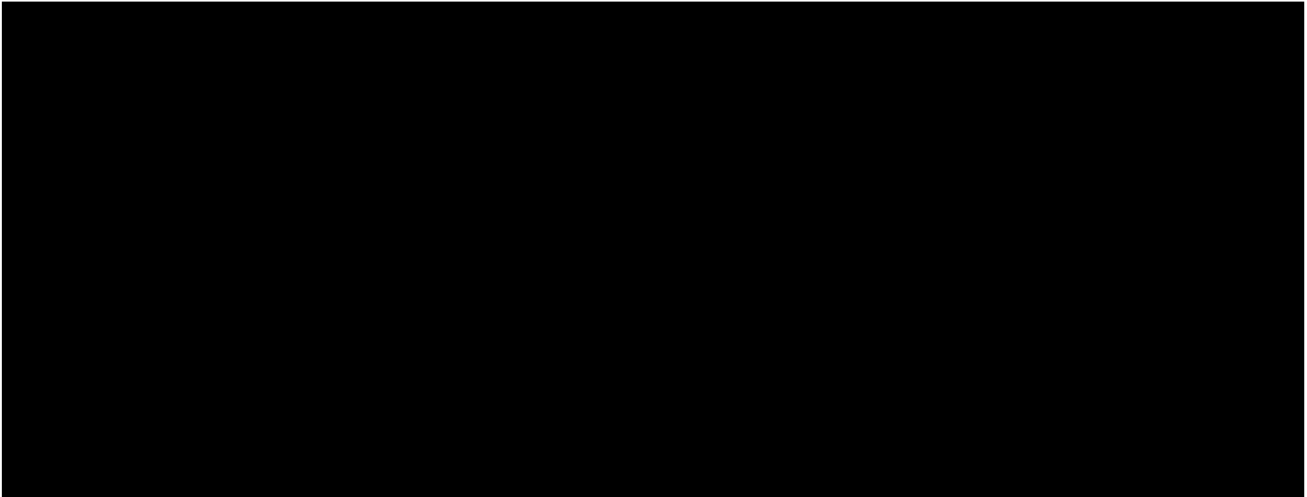
## **Corporate Emergency Management Guide**





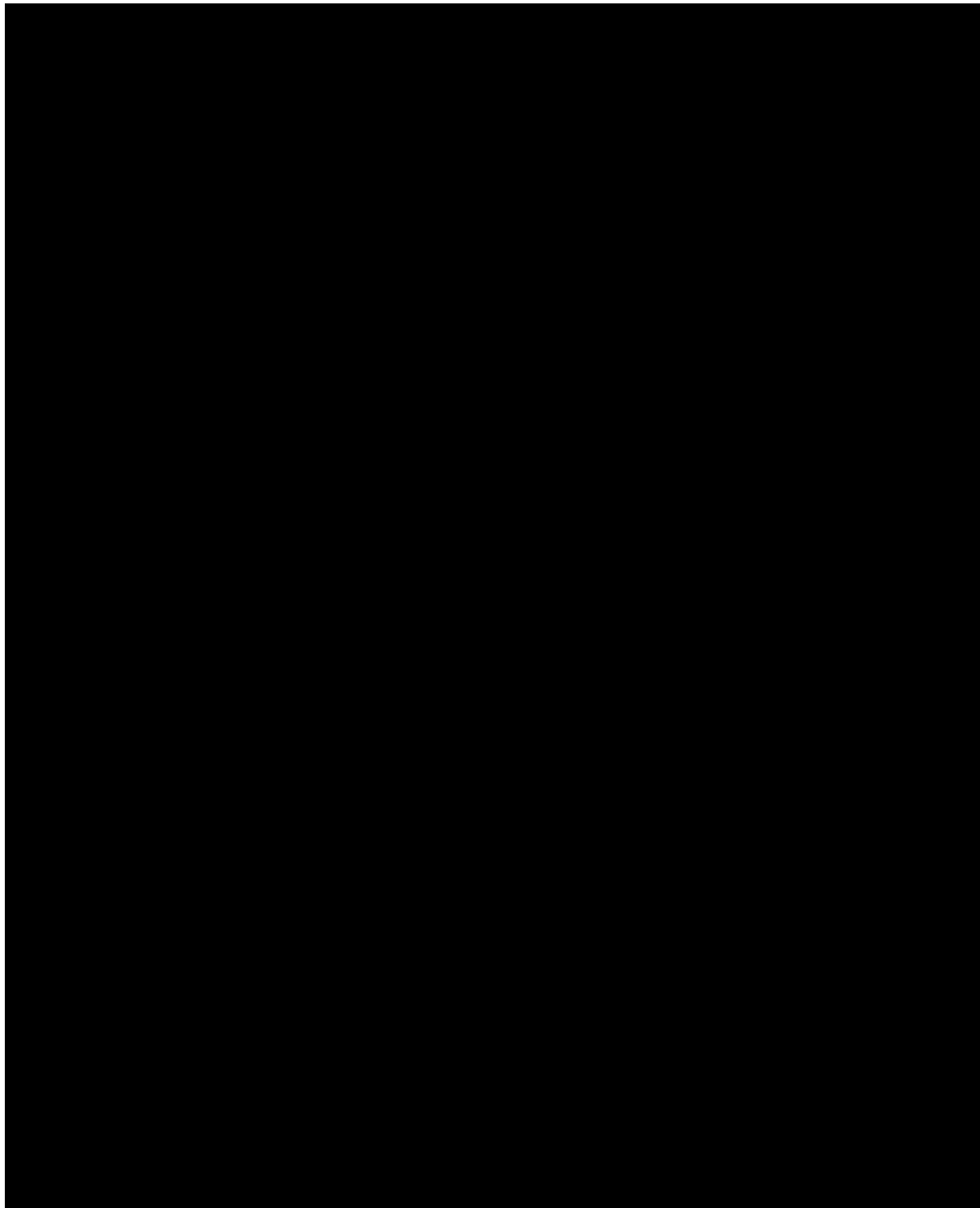


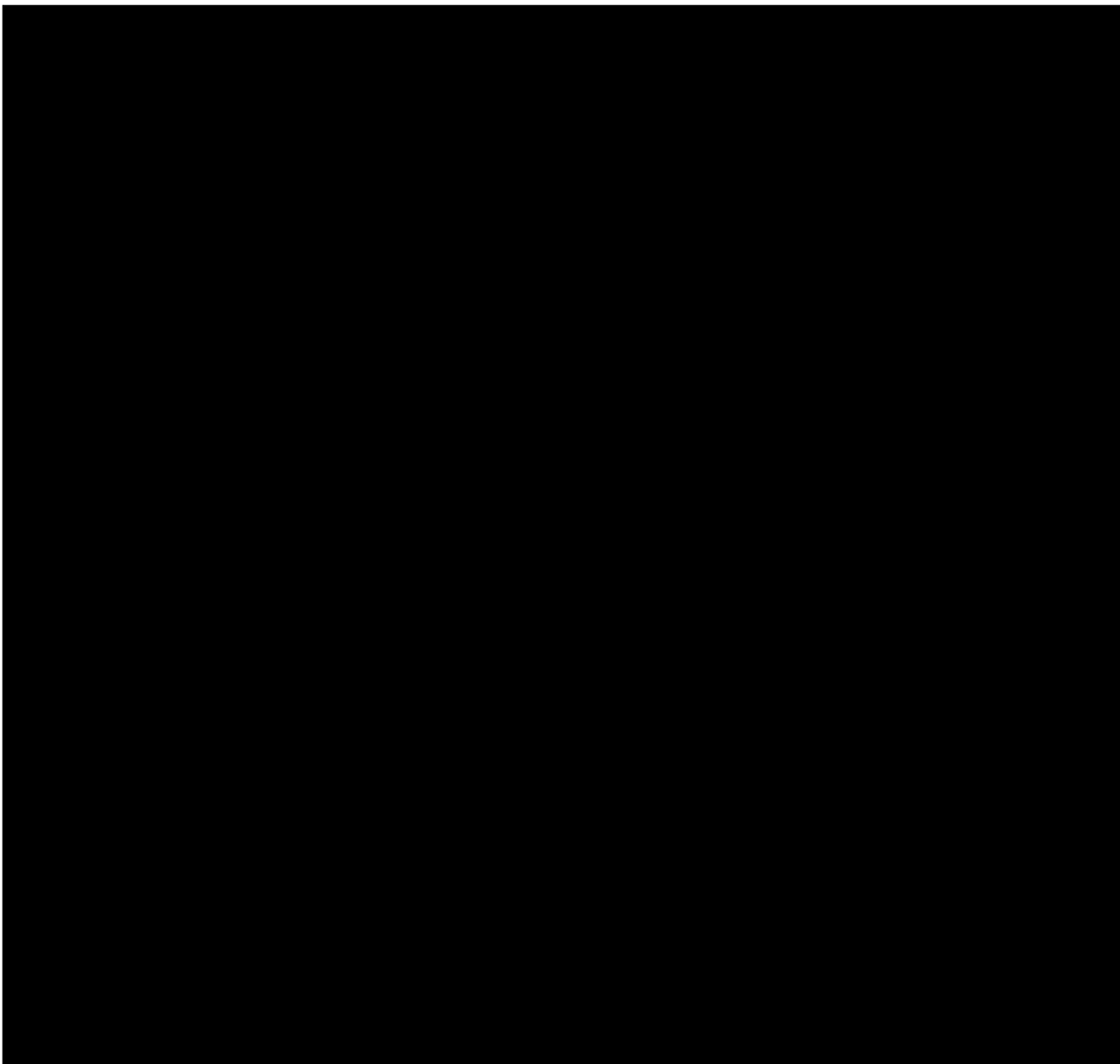




## **APPENDIX 1**

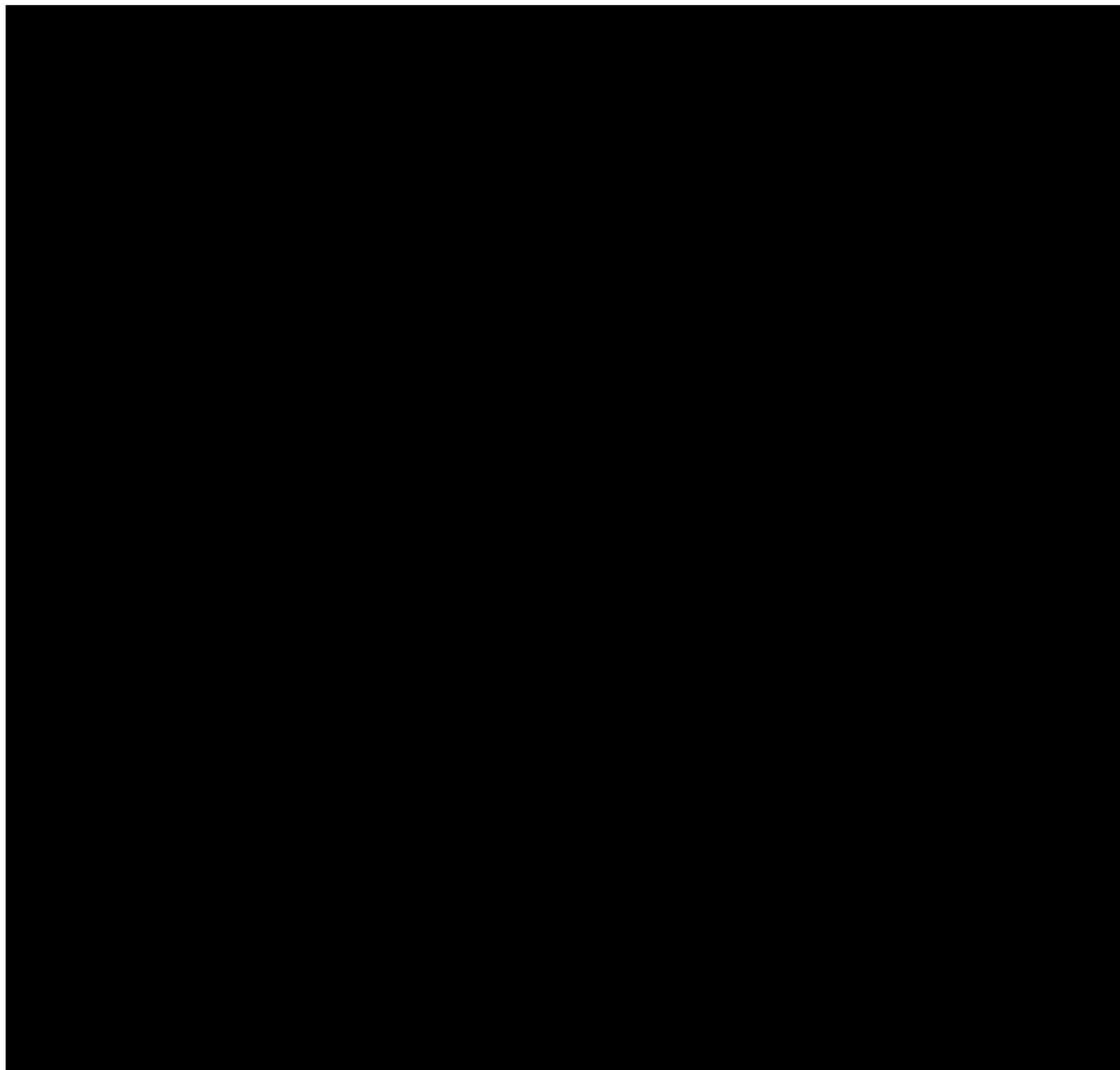
### **Crisis Assessment**





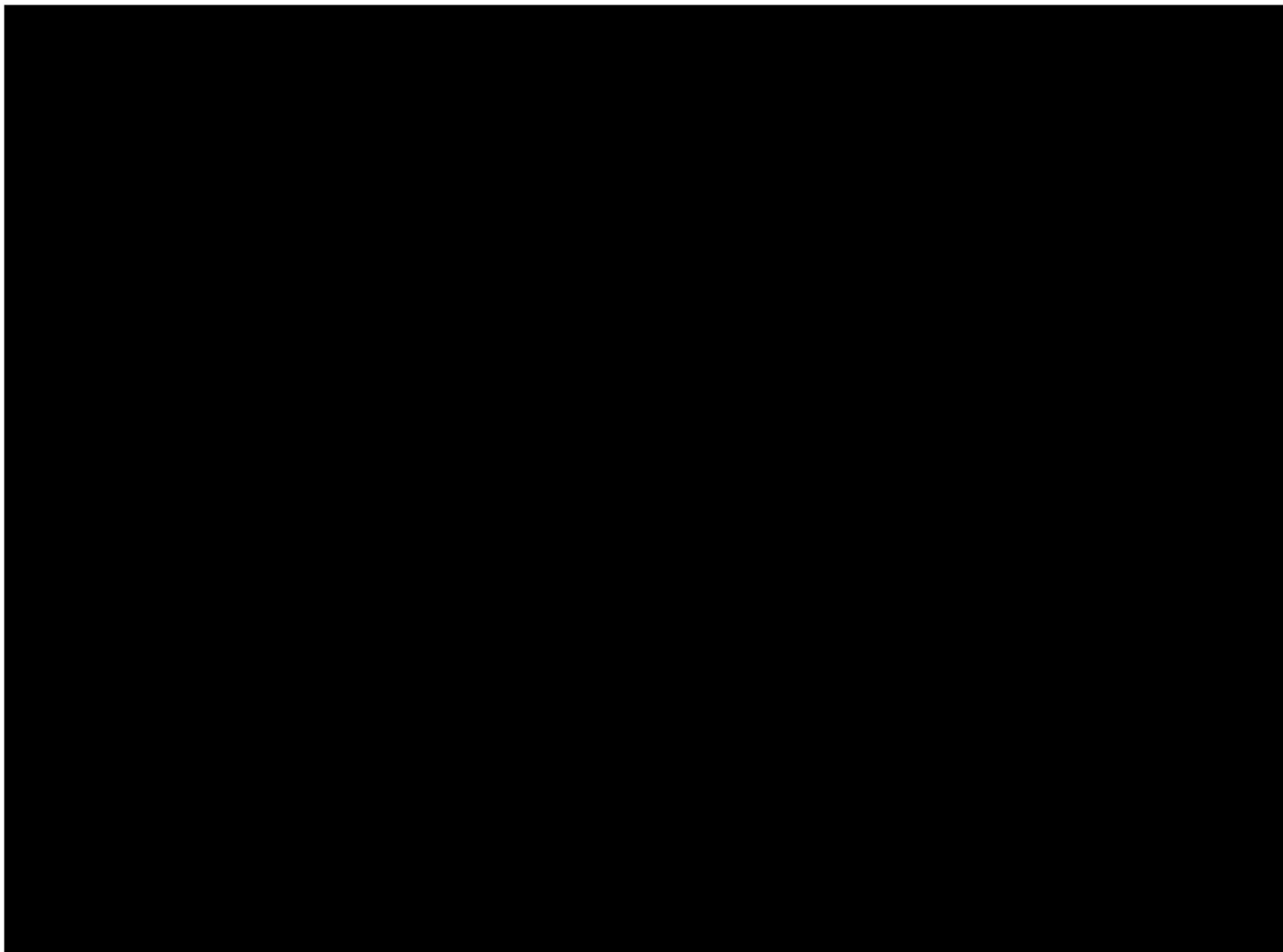
## **APPENDIX 2**

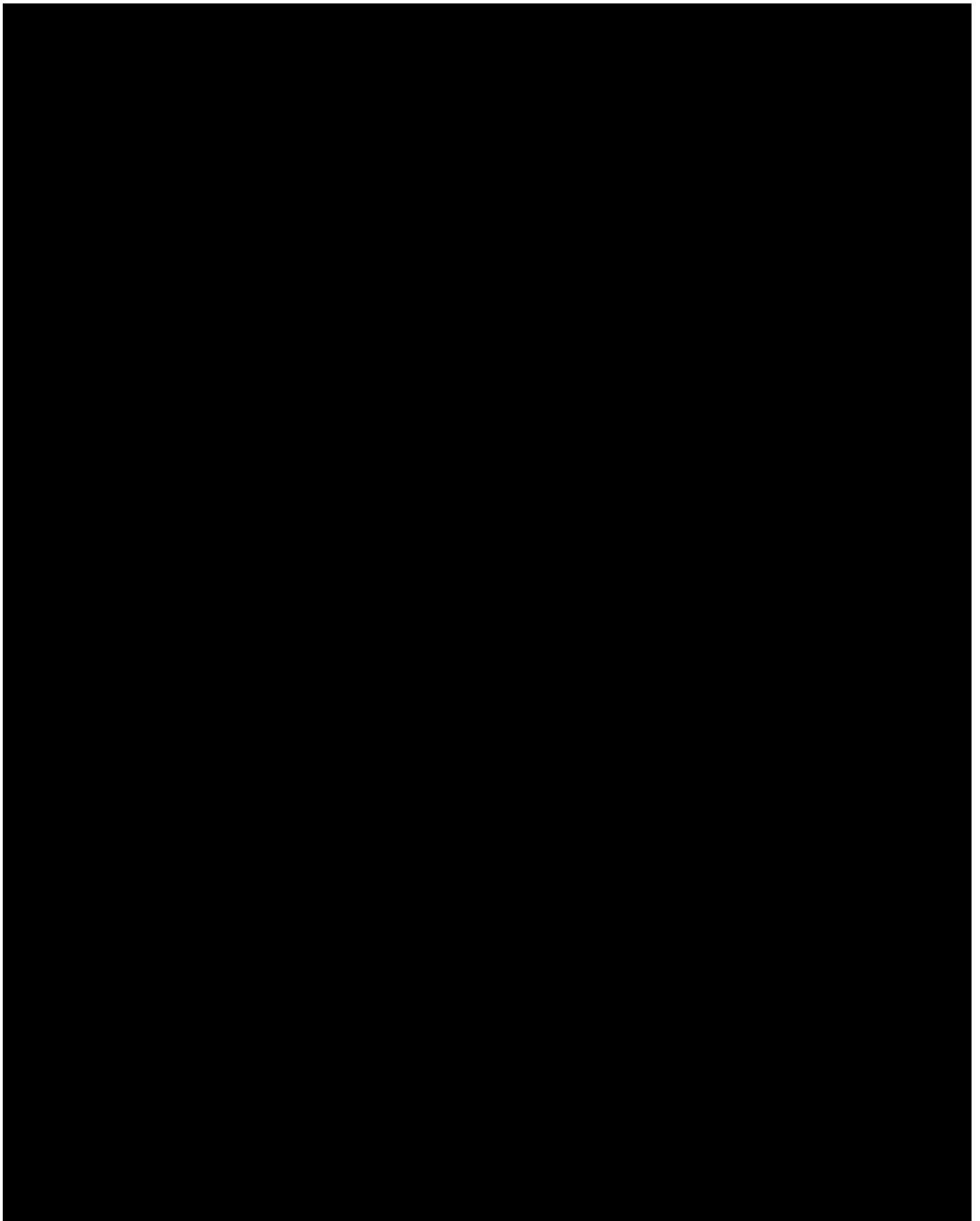
### **Crisis Information Form**

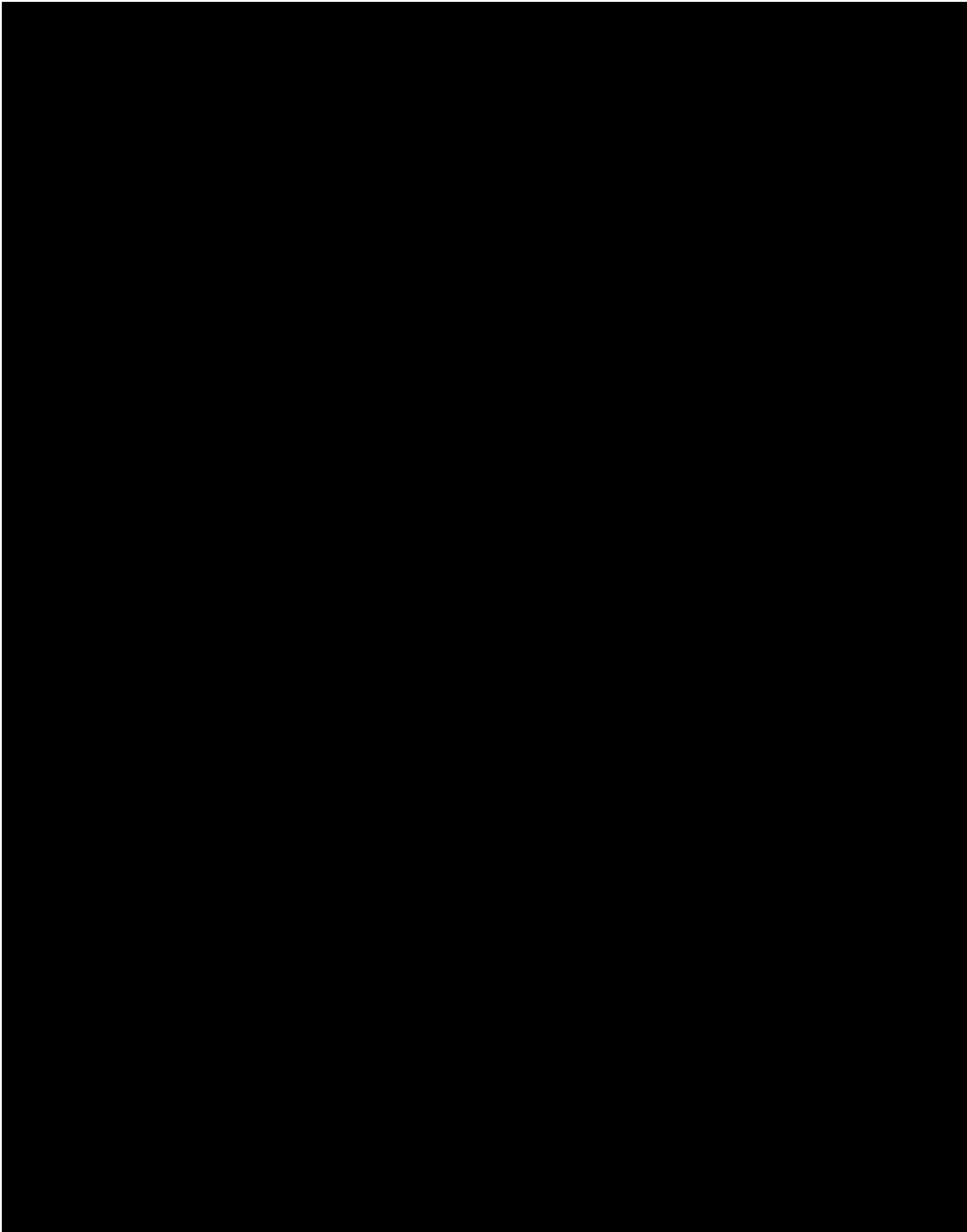


## **APPENDIX 3**

### **Task List by VP**

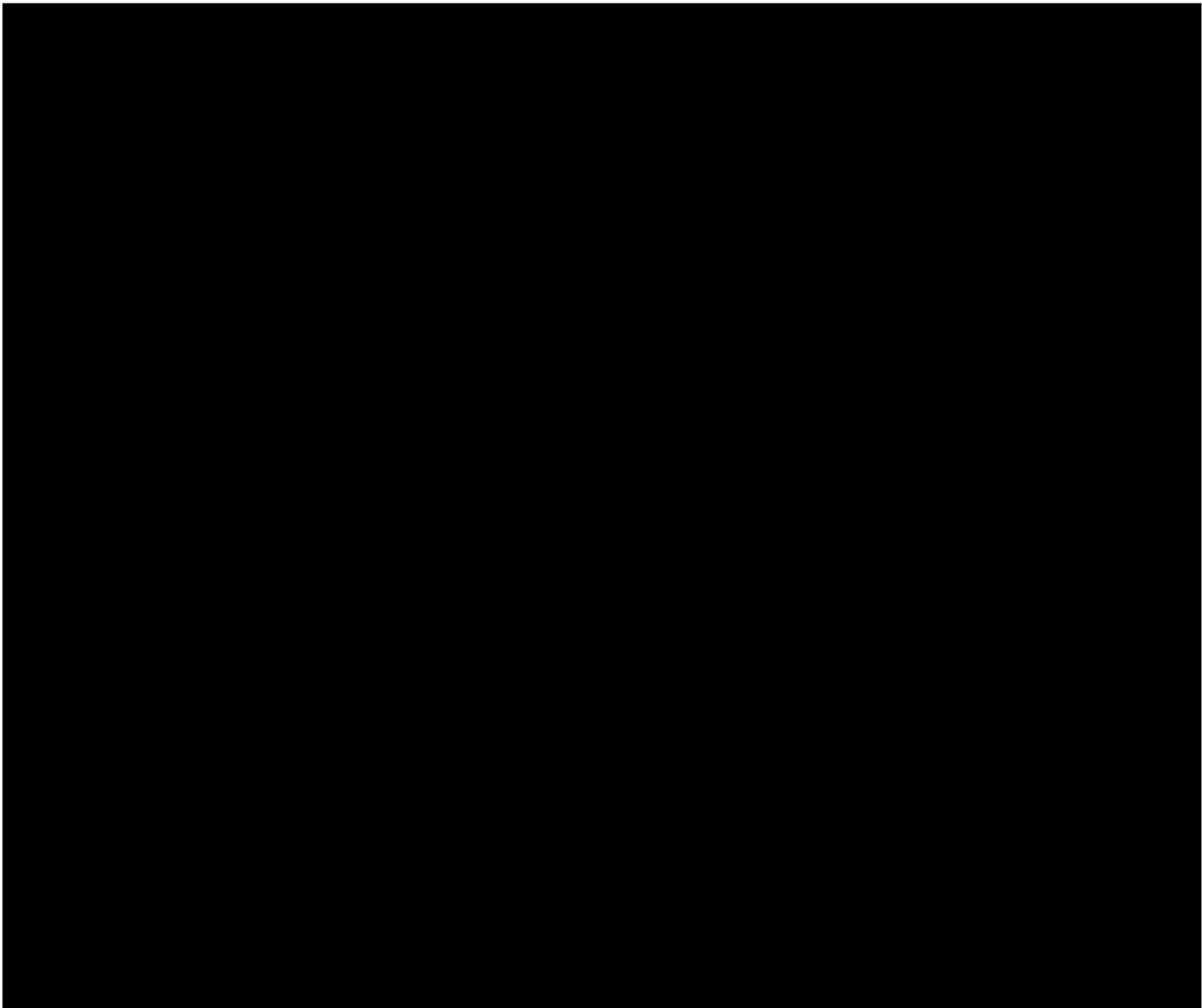




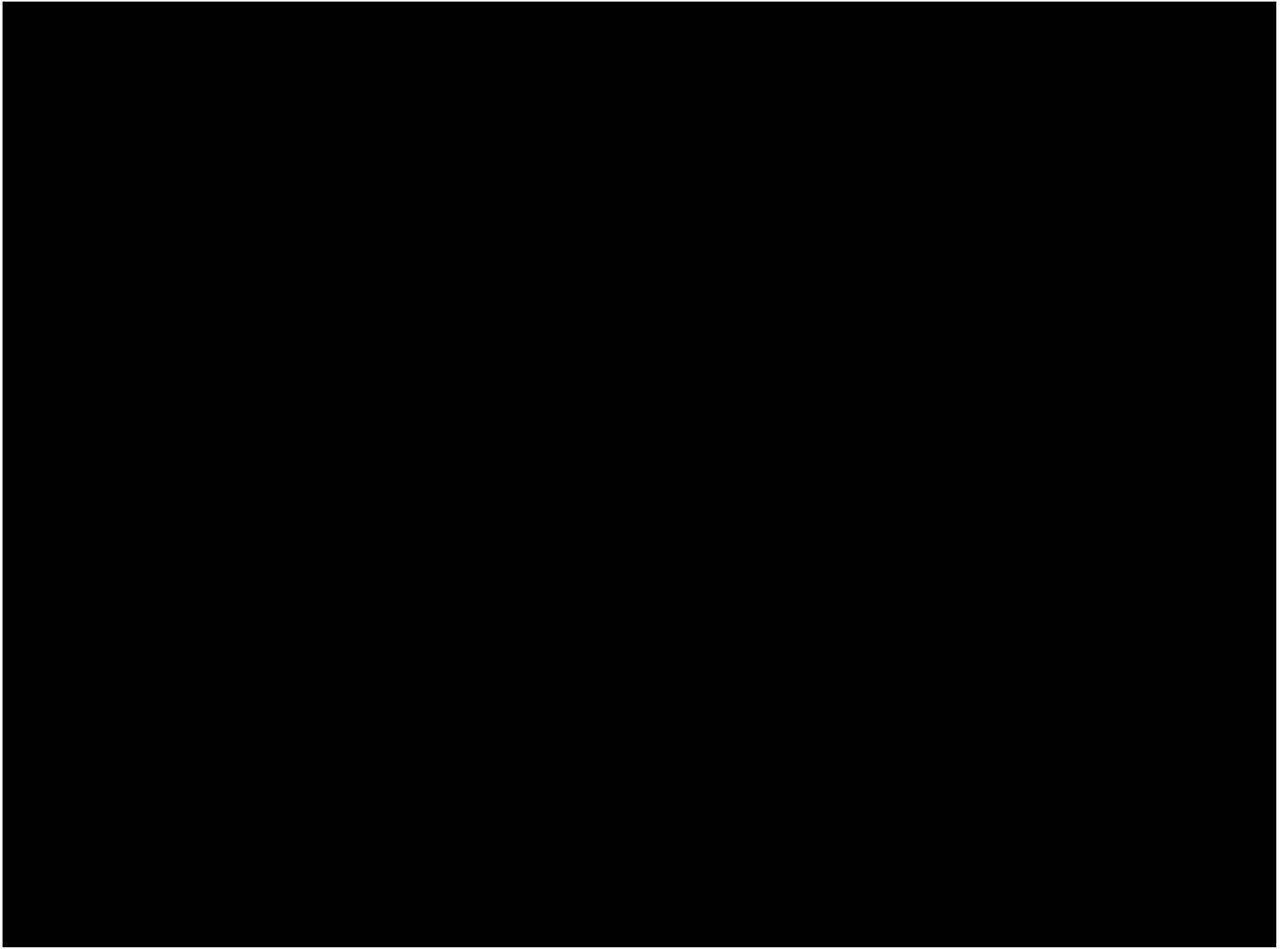


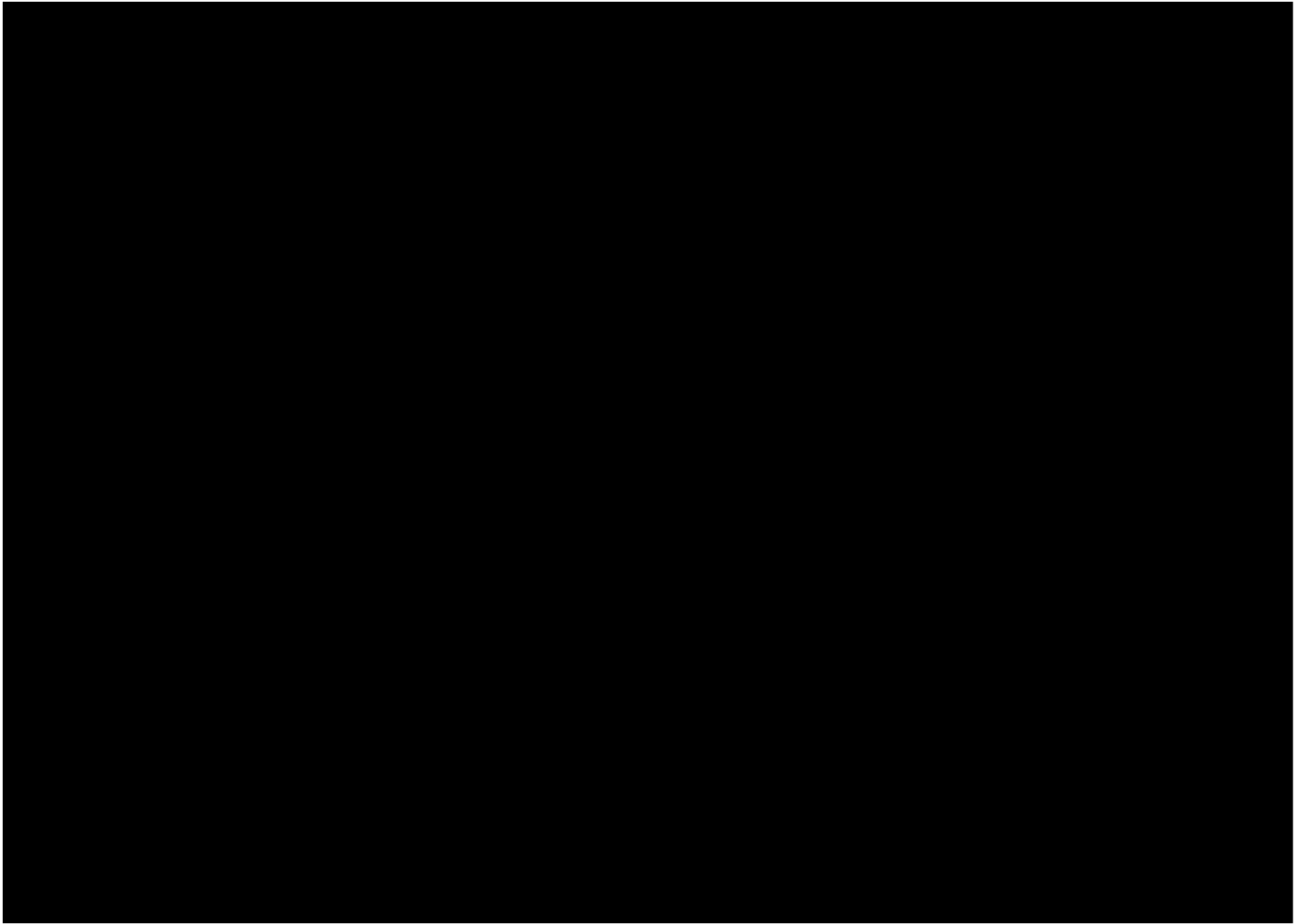


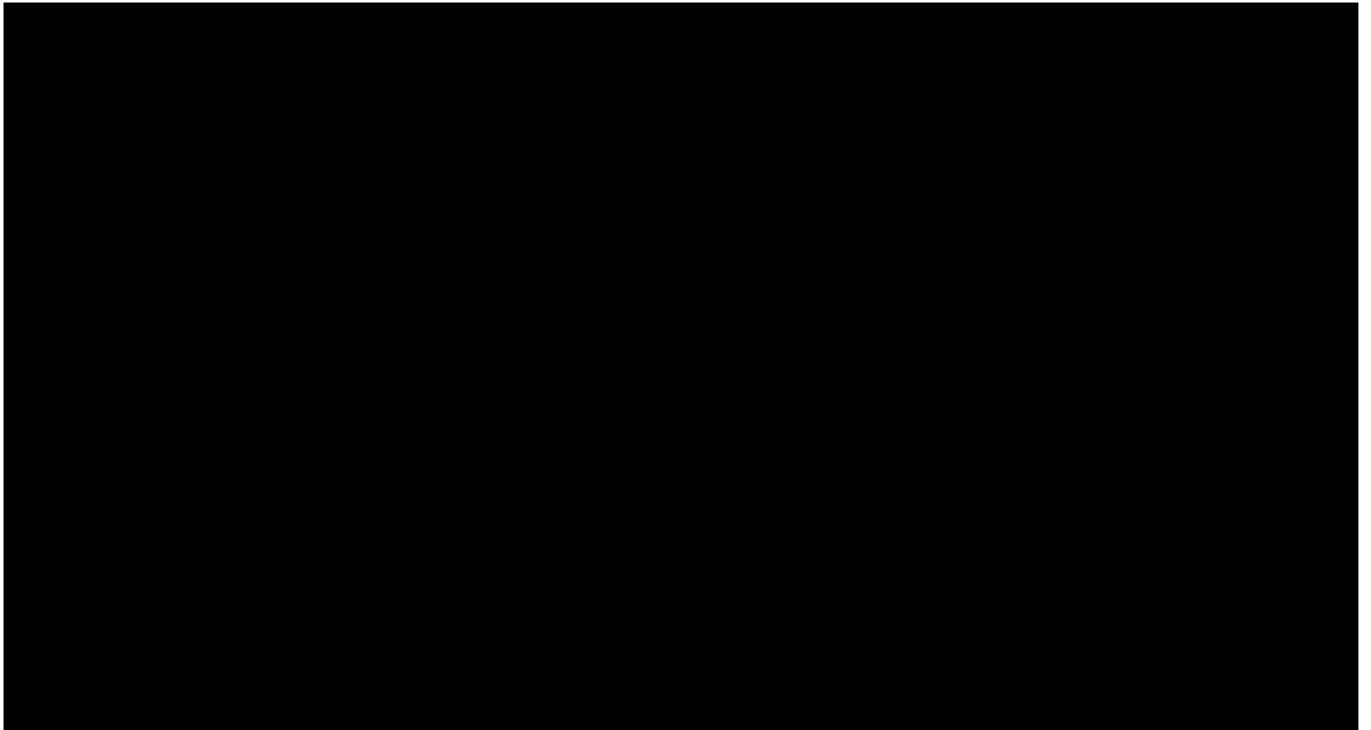




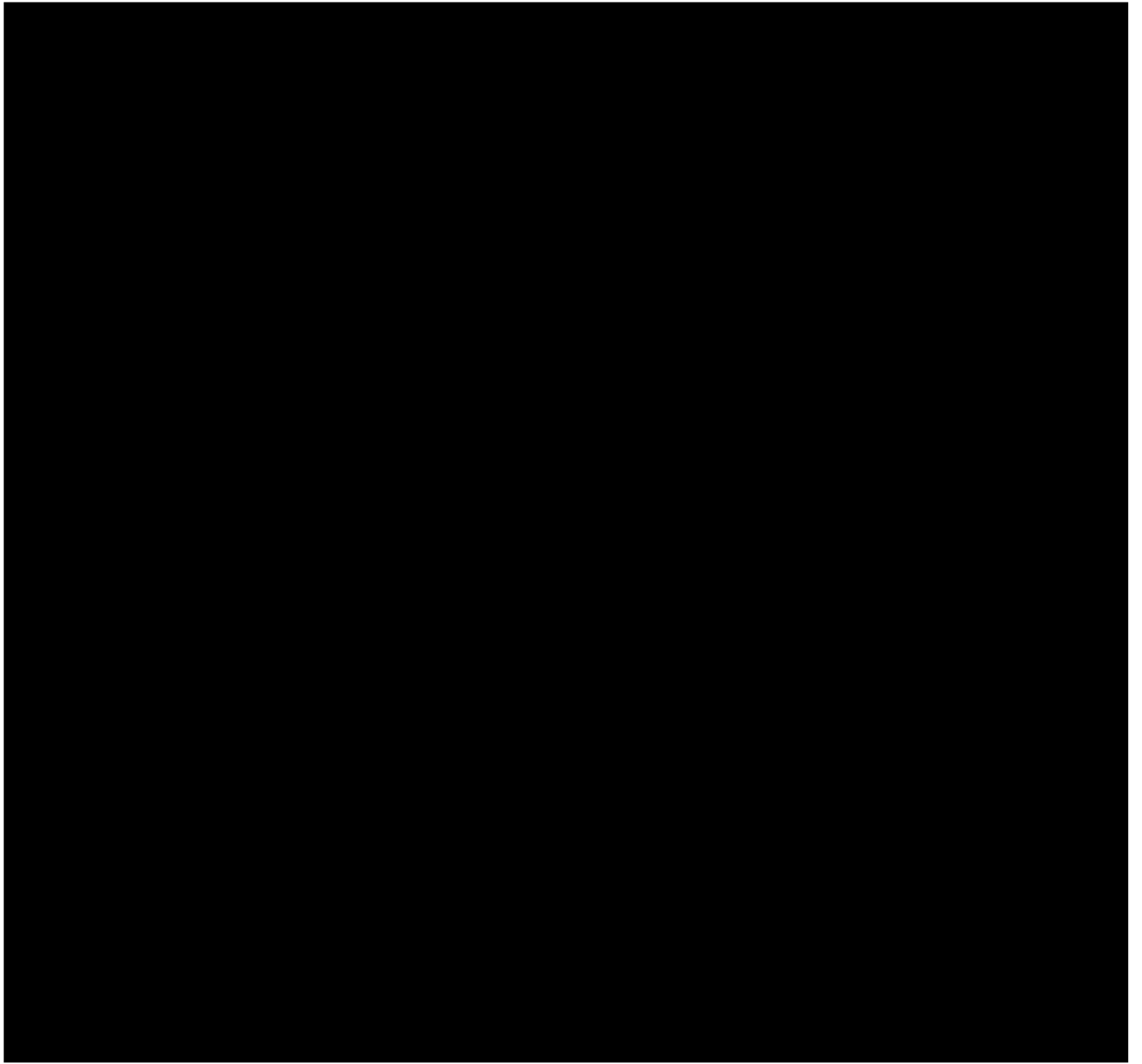






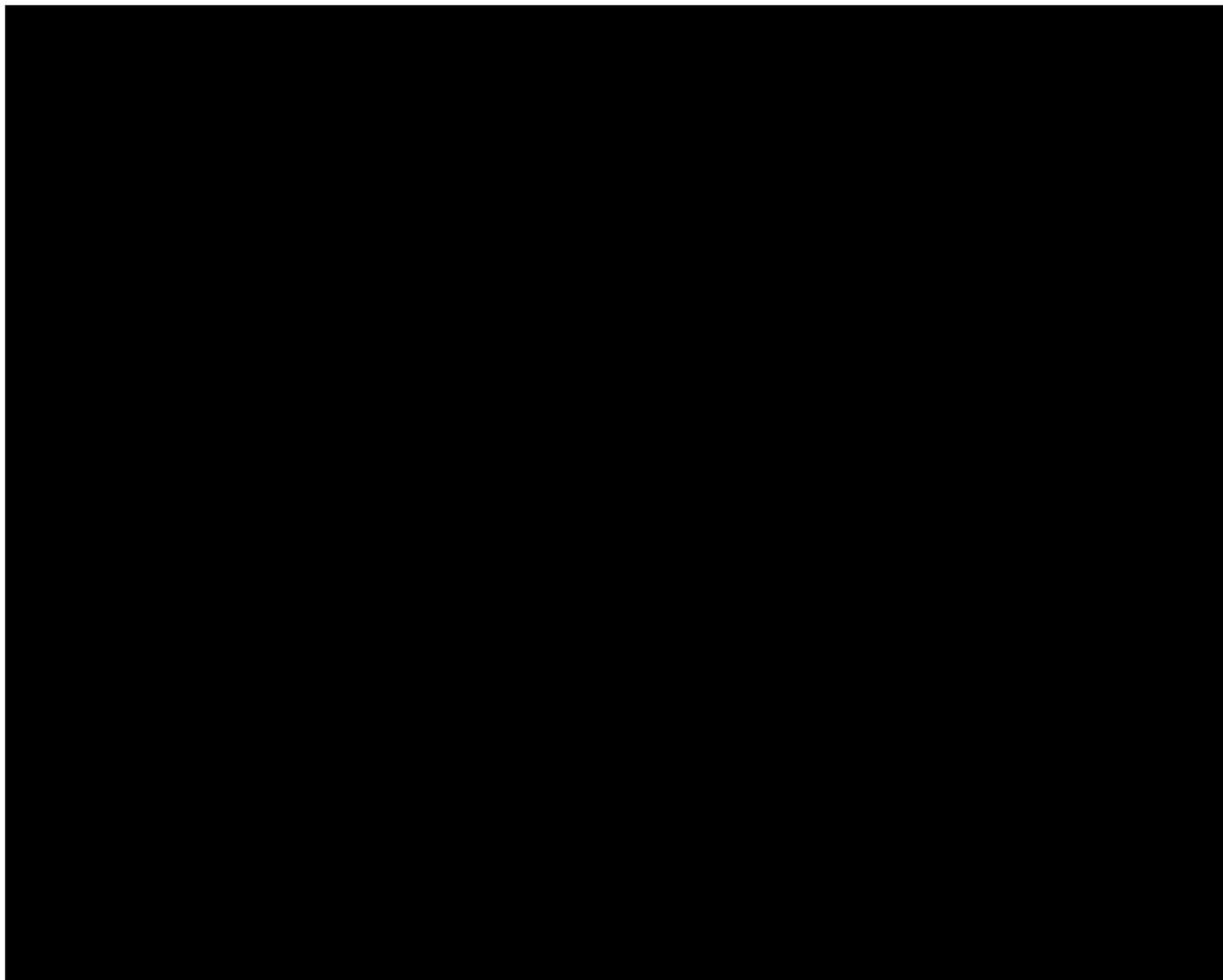






## **APPENDIX 4**

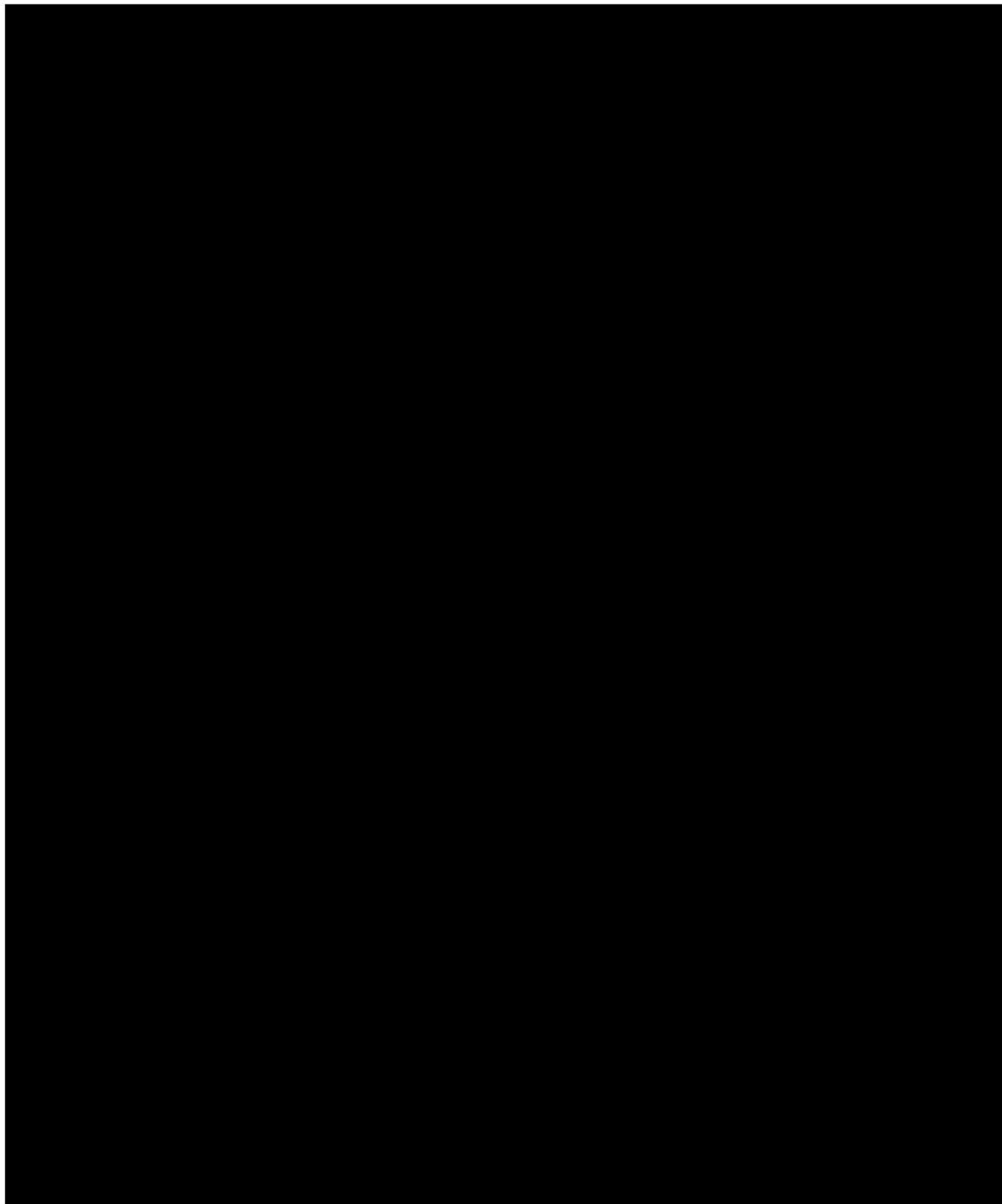
### **Crisis Management Team Contact Information**





## **APPENDIX 5**

### **Major potential corporate emergency risks**



## **APPENDIX 6**

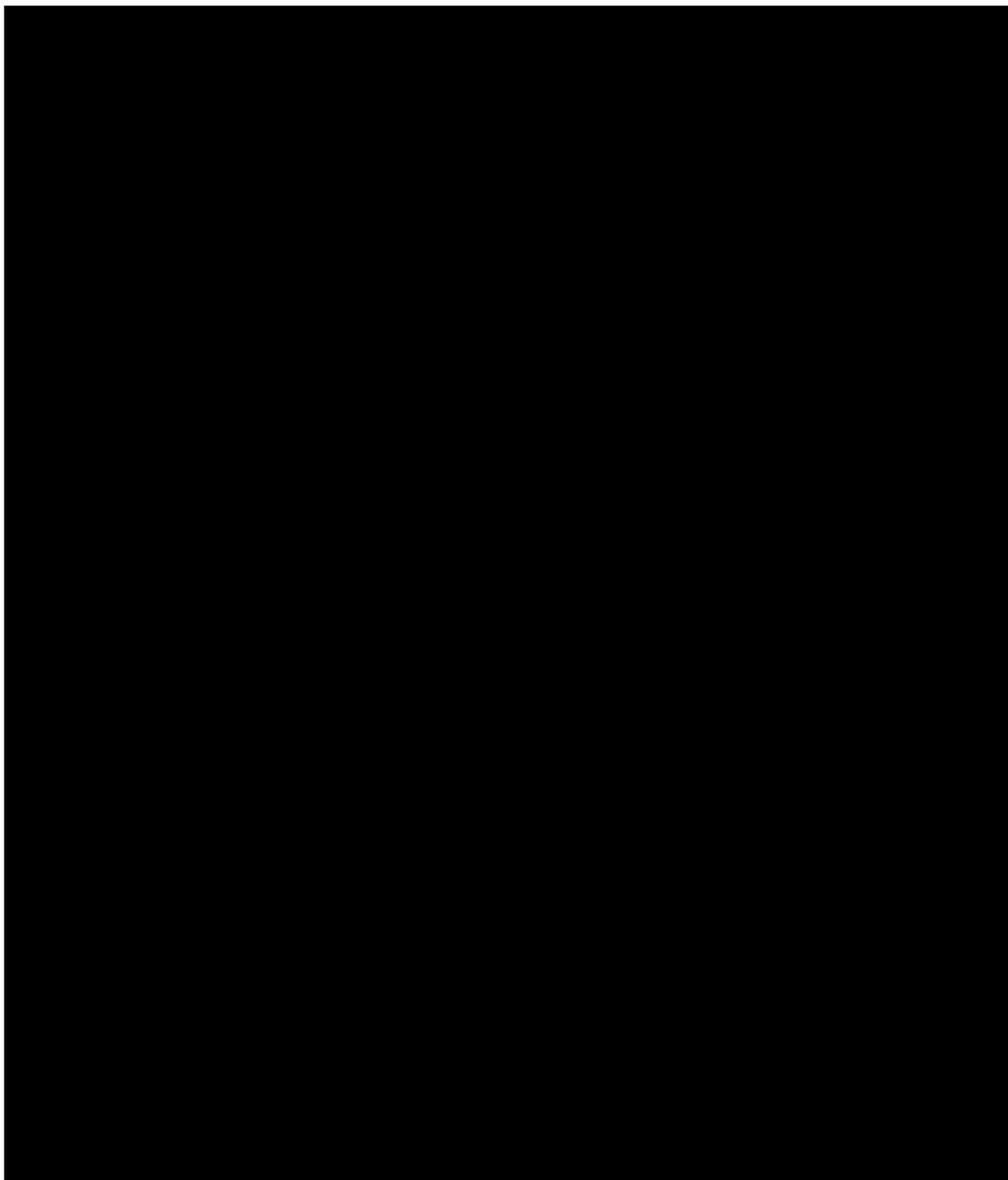
### **Crisis Management Flowchart**

SEE NEXT PAGE

\_\_\_\_\_

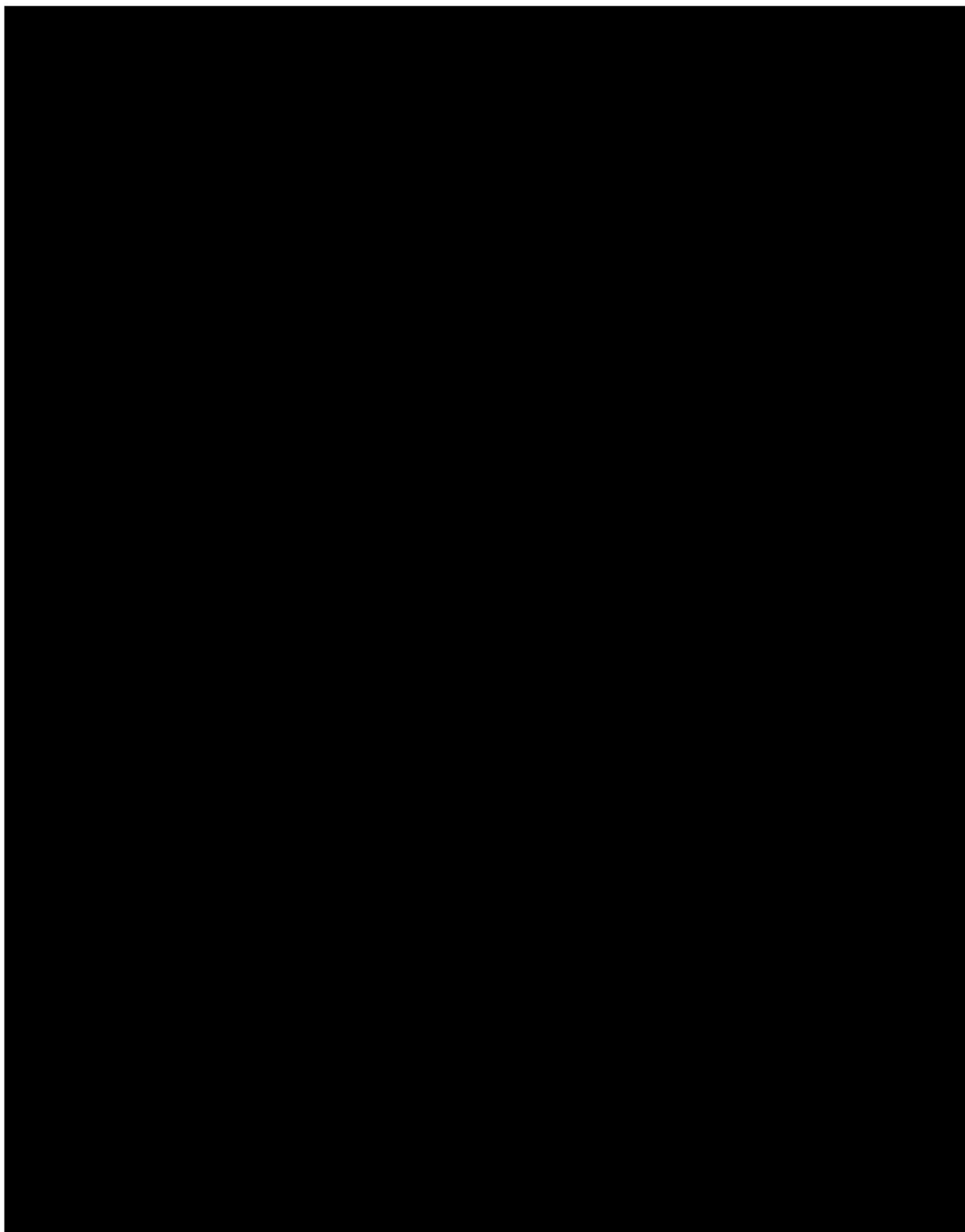
## **APPENDIX 7**

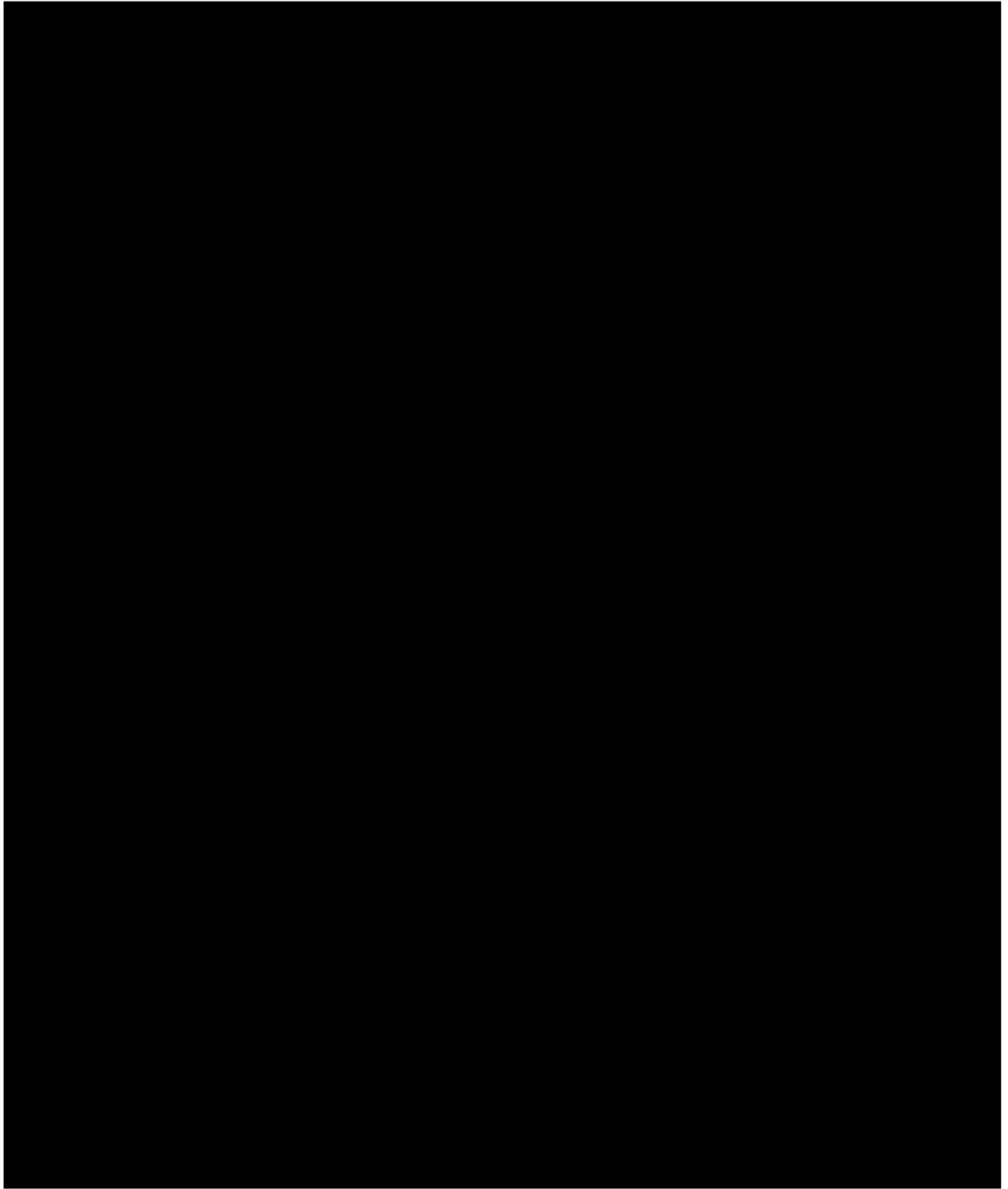
### **Decision Making Process in the Event of Ransomware**

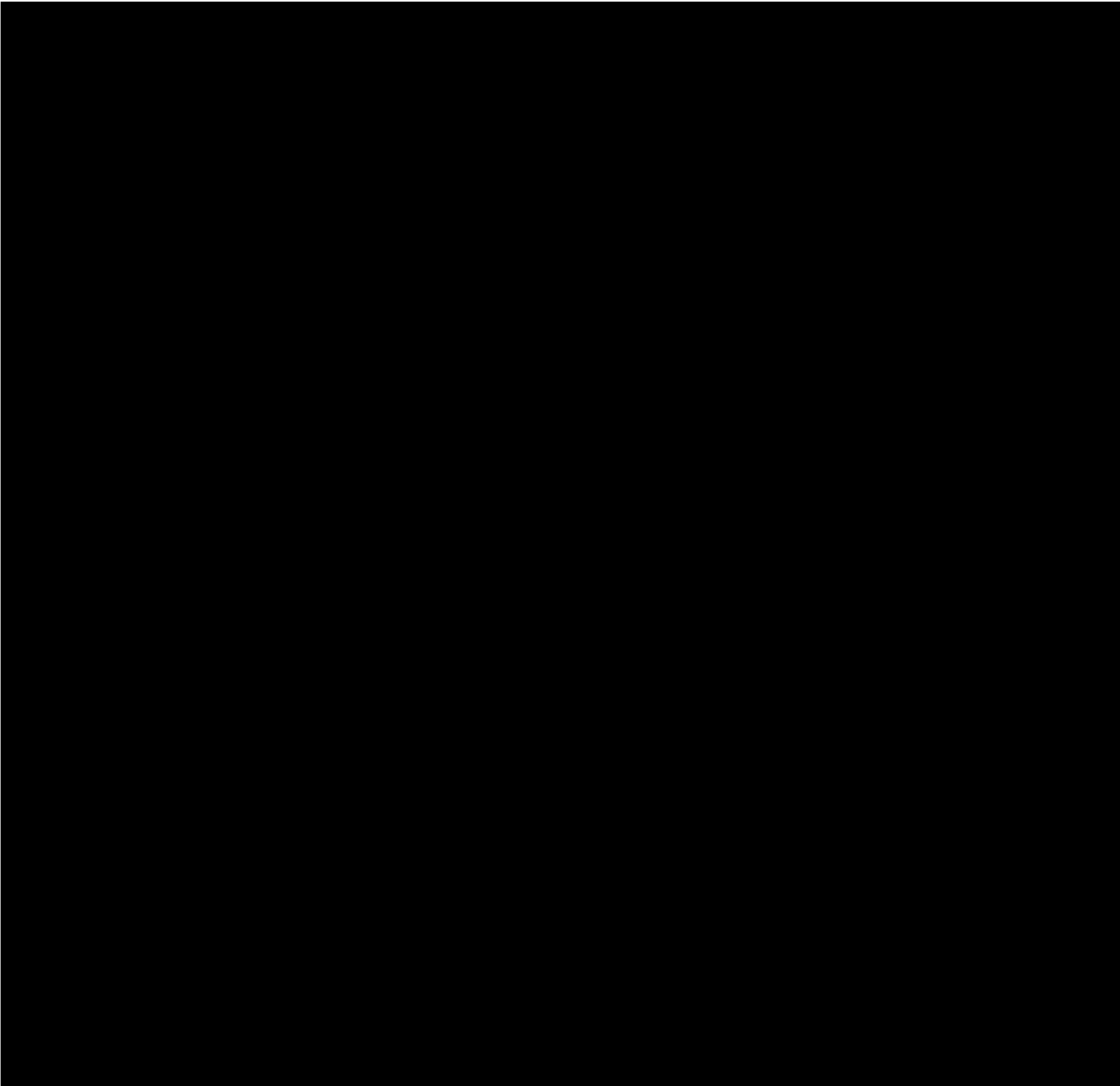


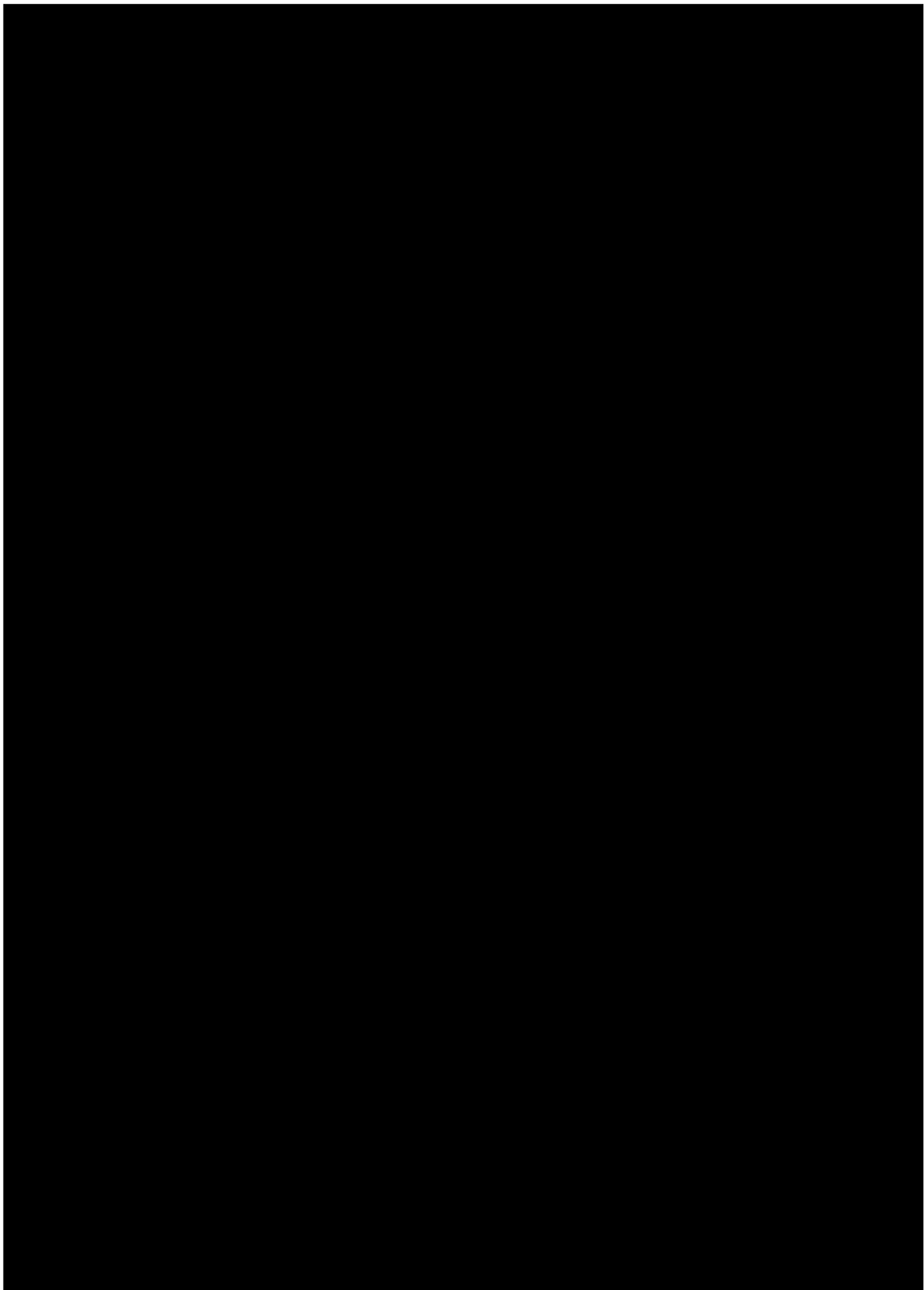
## **APPENDIX 8**

### **Communication Tools**

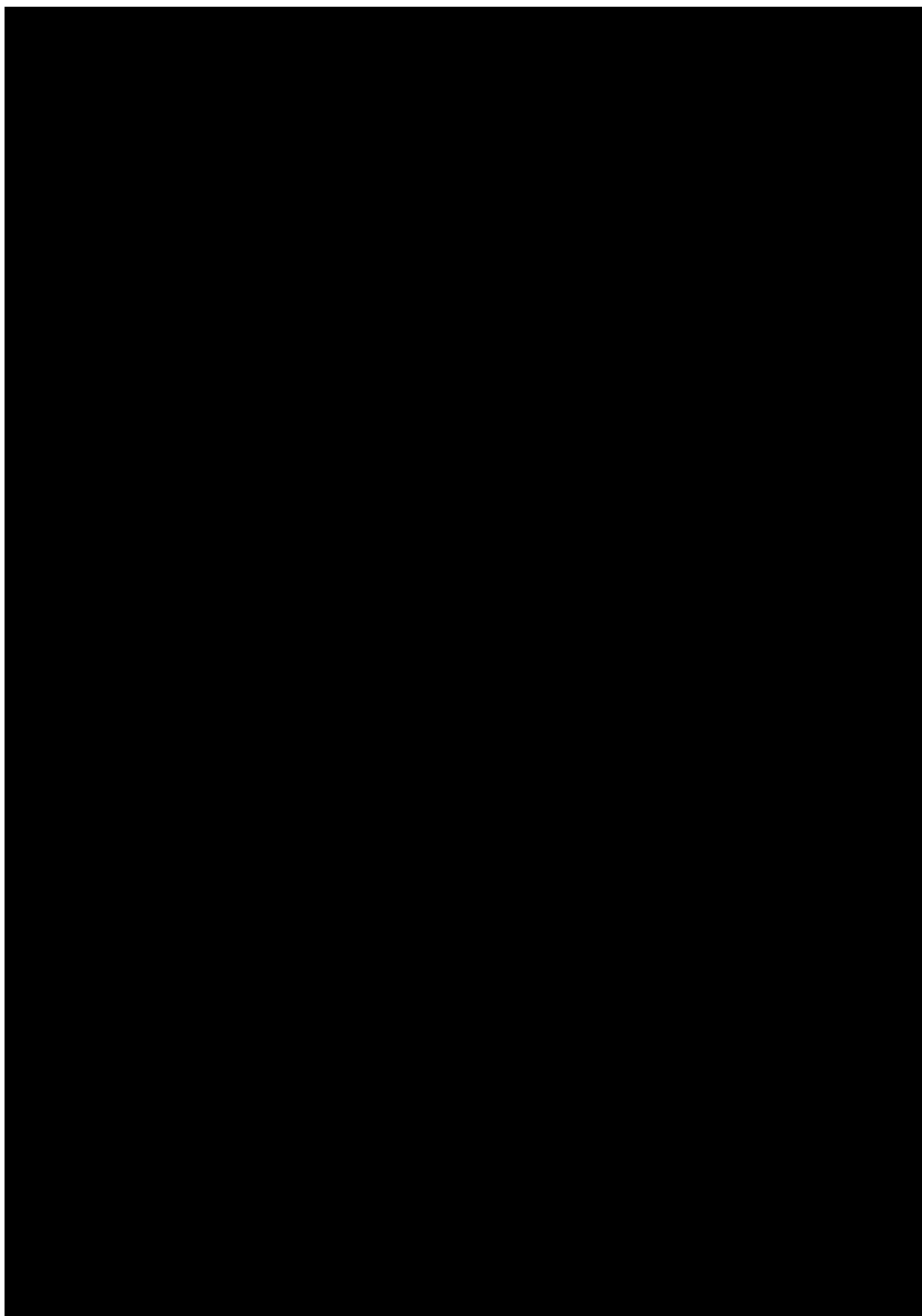


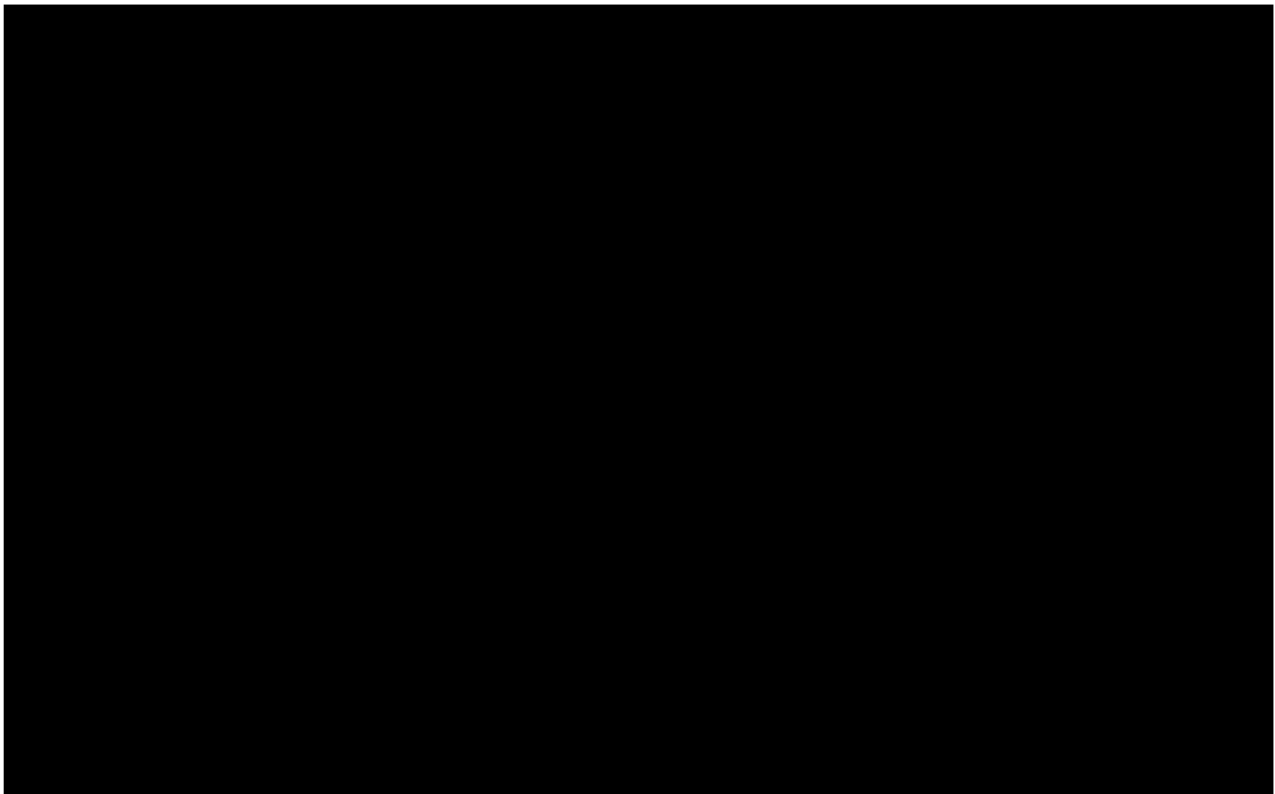






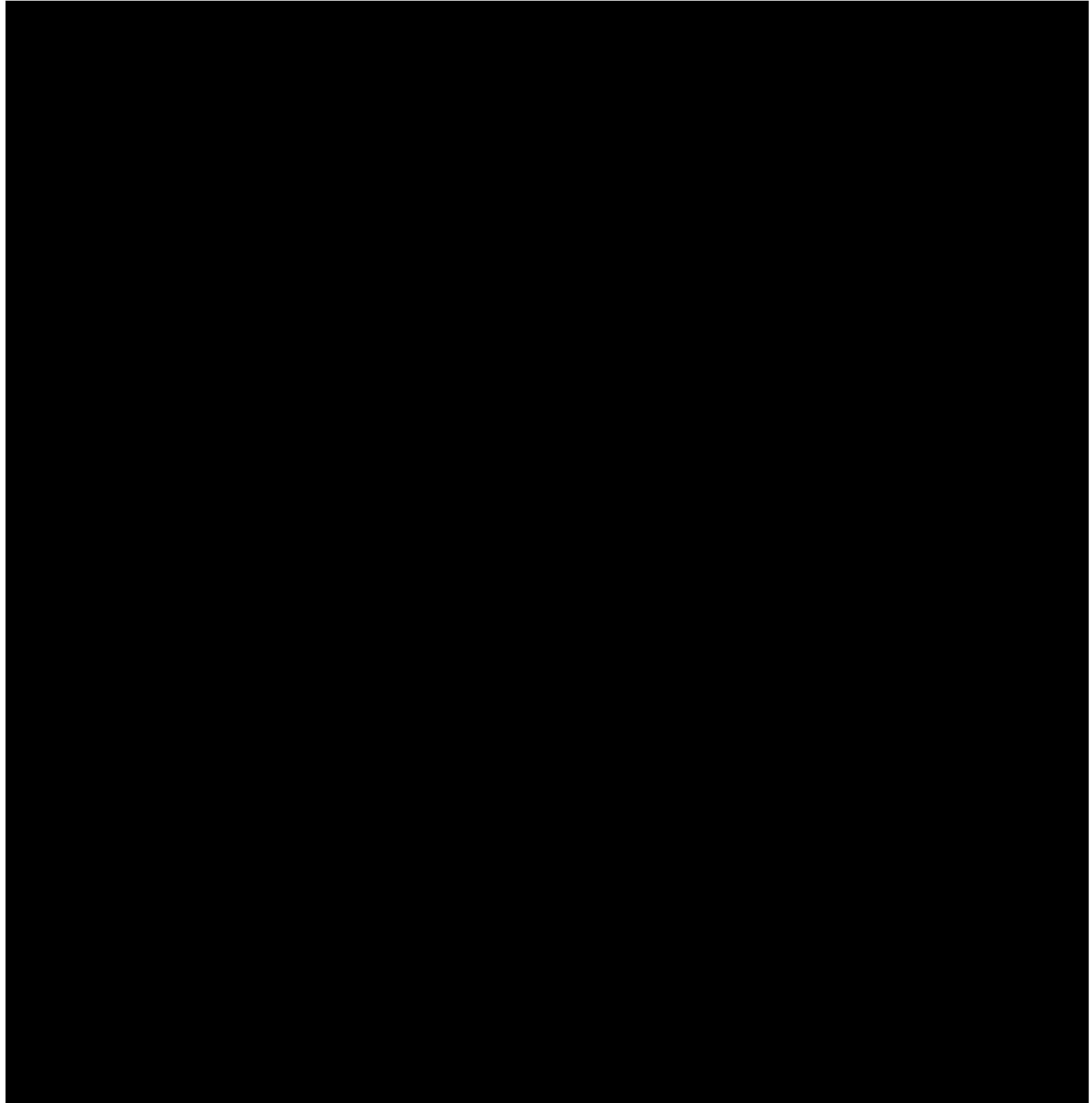






## **APPENDIX 9**

### **Site-Specific Emergency Response Plan Topic List**



**Griffin Trail Wind, LLC****Emergency Supplies**

§25.53 (d)(3)

Version Control			
Version #	Date	Content	Action By
01	21-Mar-22	Original version	SP/CL

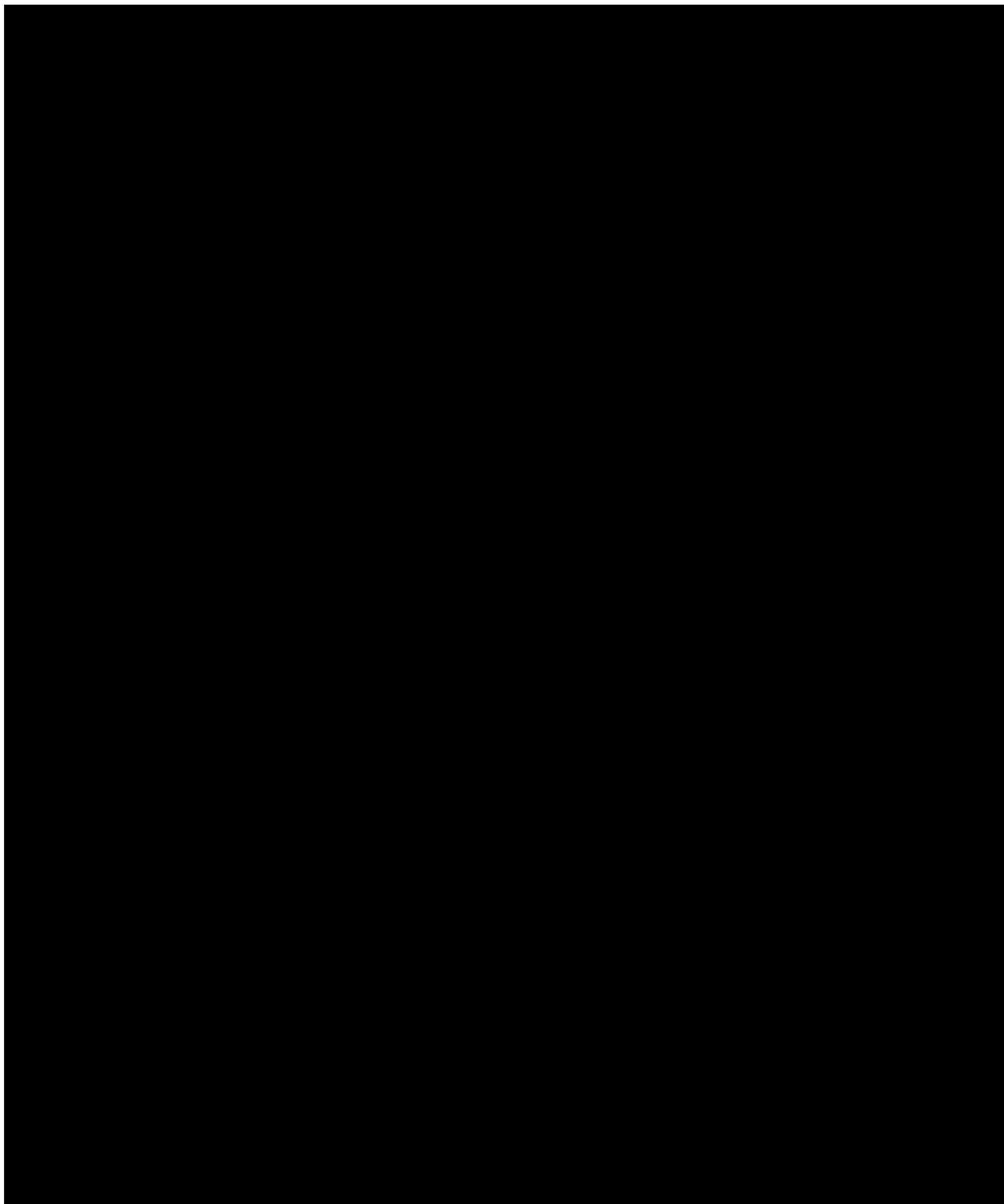
## Supplies for Emergency Response

Griffin Trail Wind, LLC (GTW) has determined what emergency response supplies are required in the O&M building, tornado shelter, and site truck(s) to maintain access and sustain life should an emergency event occur.

GTW carries out a monthly check on its emergency response supplies using the following method:

- Attachment C.1 EOP Supplies Checklist, GTW verifies the readiness of its emergency response supplies monthly, prompted by a report generated by INTERAL (Innergex maintenance management system)
- Attachment C.2, O&M Monthly Checklist
- Attachment C.3, Truck Monthly Checklist

## Attachment C.1 – GTW EOP Supplies Checklist



## Attachment C.2 – GTW O&amp;M Monthly Checklist



[REDACTED]

[REDACTED]

Plant\Warehouse: [REDACTED]

Equipment/Suite: [REDACTED]

Number: [REDACTED]-BUILD O&M

Description BUILDING O&M

Location:

Division:

Group:

Work: [REDACTED]

Component - Tac: GENERAL - [REDACTED]-BUILD O&M

Code: Monthly maintenance

Monthly maintenance

FACILITY INSPECTION

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Comments:

FACILITY INSPECTION

Due date [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# PREVENTIVE TEMPLATE

#

PREV-0009243

[REDACTED]

VERIFY - Emergency Supplies are not expired and accounted for PER PUCT EOP 25.53 Pre Identified supply list

- - \*\*\*LUNCH ROOM\*\*\*

[REDACTED]

# PREVENTIVE TEMPLATE

# PREV-0009243

[REDACTED]

VERIFY - WATER: ensure back up water supply is fresh and availibly for use

[REDACTED]

# PREVENTIVE TEMPLATE

#

PREV-0009243

[Redacted Content]

# PREVENTIVE TEMPLATE

#

PREV-0009243

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]S

VERIFY - STORM SHELTER : LIGHTS, STEPS CLEAR, FLOOR CLEAN

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

[REDACTED]	
[REDACTED]	

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## Attachment X.3 – GTW Truck Monthly Checklist

114

\_\_\_\_\_

-VEH

## VEHICLES

\_\_\_\_\_

GENERAL - [REDACTED] -VEH

Monthly maintenance

Monthly maintenance  
INSPECTION VEHICLE [REDACTED]

© 2006 The Authors  
Journal compilation © 2006 Blackwell Publishing Ltd

Department / Resource

# / Parallel

**Expense account**

Opération et Maintenance / 1 / ☐

Superviseur

© 2006 The Authors  
Journal compilation © 2006 Blackwell Publishing Ltd

CLE [REDACTED]  
500 Silver

© 2006 The Authors  
Journal compilation © 2006 Blackwell Publishing Ltd

---

The image displays a series of 10 vertical bars, each composed of horizontal segments. The bars are arranged in a row, and their heights vary significantly. The segments within each bar are of different lengths, creating a stepped appearance. The overall pattern suggests a sequence of data points or a progression over time.

	[REDACTED]	[REDACTED]
--	------------	------------

[illegible]

# PREVENTIVE TEMPLATE

# PREV-0011777

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



## PREVENTIVE TEMPLATE

#

**PREV-0011777**

\_\_\_\_\_

████████████████████

© 2006 The Authors

© 2006 The Authors

\_\_\_\_\_

██████████



\_\_\_\_\_

**[REDACTED]**

[REDACTED]

114

10

114

**Griffin Trail Wind, LLC**  
**Emergency Staffing Plan**  
§25.53 (d)(4)

Version Control			
Version	Date	Content	Action By
01	02-Nov-21	Original Version	SP/CL/MA/MC
02	17-Mar-22	Update for new PUCT Substantive Rule §25.53	SP/CI

## Table of Contents

1	Definitions .....	3
2	Introduction .....	3
3	Site Staffing Plan .....	3
3.1	Description of Critical and Non-Critical Positions .....	3
3.1.1	Site Manager/Person-In-Charge .....	3
3.1.2	Critical Positions for Continued Plant Operations .....	3
3.1.3	Non-Critical Positions that Could Be Temporarily Halted .....	4
3.1.4	Individuals Capable of Carrying Out Site Functions .....	4
3.2	Critical and Non-Critical Coverage .....	4
3.2.1	Work Shifts Required to Continue Critical Activities .....	5
3.3	Returning to Normal Operations .....	5

## 1 Definitions

- |         |   |
|---------|---|
| • ERCOT | Electric Reliability Council of Texas           |
| • GTW   | Griffin Trail Wind, LLC                         |
| • NERC  | North American Electric Reliability Corporation |
| • OEM   | Original Equipment Manufacturer                 |
| • PIC   | Person-in-Charge                                |
| • PUCT  | Public Utilities Commission of Texas            |
| • WTG   | Wind Turbine Generator                          |

## 2 Introduction

This staffing plan outlines the staffing requirements at Griffin Trail Wind, LLC (GTW) needed to maintain reliable operations in the case of an emergency event.

In the instance of an emergency event, it is assumed a percentage of staff may not be available due to an inability to travel, safety concerns and the need to be with their families. The approach taken in this staffing plan is to identify a means of operating GTW safely, environmentally compliant, and reliably with ■■■ of the staff unavailable. It should be understood however that if staff are able to safely travel to and access the site, they may do so irrespective of the percentage availability. All best efforts will be maintained to ensure reliable operations. Regardless of percentages, all best efforts will be maintained to ensure reliable operations with the safety of all on site being the paramount concern.

The first steps outlined in this plan detail how the critical positions would be staffed with the reduced workforce. The second part of this plan includes measures that would be taken to attempt to ensure the ■■■ of the staff that are still able to travel to and carry out a function on site remain safe to maintain the site's operational status until the emergency event classification is removed, and/or further staffing resources can be located.

## 3 Site Staffing Plan

### 3.1 Description of Critical and Non-Critical Positions

#### 3.1.1 Site Manager/Person-In-Charge

The site person-in-charge (PIC) for any activities related to this Staffing Plan would be the Site Manager. In an actual emergency event, should the Site Manager not be able to carry out their role, the role/duties would be filled by others not necessarily in this order:

- Manager – Operations, Wind and Solar Energy
- Senior Director – Operations and Maintenance (available remotely)
- OEM Site Manager
- OEM Lead Technician

#### 3.1.2 Critical Positions for Continued Plant Operations

The following are designated as “critical positions” and are vital to the continued operations at the facility.

- Site Manager or PIC

- OEM Site Manager
- OEM Lead Technician
- OEM Technician – EHS Coordinator

### 3.1.3 Non-Critical Positions that Could Be Temporarily Halted

No positions can be halted; however, steps can be taken to minimize the number of persons attending site. The following positions could all focus on directing site operating activities most of the time and can, on an as-needed basis, undertake critical activities in their areas of prime responsibility.

- OEM Technician

[REDACTED]

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

[REDACTED]

[REDACTED]

### 3.2 Critical and Non-Critical Coverage

[REDACTED]

[REDACTED]

[REDACTED]

### 3.2.1 Work Shifts Required to Continue Critical Activities Operations

The GTW Site Manager will be available on site or remotely to be the designated site person-in-charge. It is the responsibility of the site person-in-charge to maintain daily operations and to coordinate with the OEM Site Manager/Site Lead to ensure sufficient Technician coverage to maintain the WTGs. The person-in-charge will rotate responsibility as necessary to ensure that fatigue is not an issue and that clarity with regards to decision-making is maintained. It is expected that a person-in-charge will be available on an on-call basis during out-of-hours so that should an incident occur which requires attention, there is someone to take control. It is for the person-in-charge in conjunction with OEM site management to determine if/when to incorporate an ancillary work force should available staffing numbers drop below 40% and when to switch site operation back to a normal work schedule.

Should the circumstances require personnel to remain on site for a prolonged period, emergency supplies and accommodation will be available in the O&M building.

#### OEM WTG Technicians

In an emergency event, ■ Technicians have the capability to work remotely, however due to the nature of the role, they are limited to being able to carry out resets to keep the turbines operational. ■

#### Ancillary Work Force

Due to the unique operating characteristics and controls of a wind power facility, the Operations personnel and Technicians would be the most difficult to replace with outside resources. Efforts to support, and as needed replace, these personnel would be focused on using internal site/OEM staff or staff from nearby Innergex Renewable Energy Inc.-owned sites if they are able to travel, any local or able to travel OEM Support Technicians, and third-party contractors with wind/solar site experience (depending on which site requires support).

### 3.3 Returning to Normal Operations

The decision to return to a full compliment of on-site staff will be made based on a number of external and internal factors. Critical to this decision will be ERCOT's exit of an Energy Emergency Alert which will denote a return to normal grid conditions. The decision will be also based on physical site conditions such as access to the WTGs, site office and blade icing, as well as input ■ regarding any temporary staffing arrangements and their effect on Griffin Trail and other area ■. The safety of all site staff is of paramount concern and no instructions to return to site will be given without assurances that any safety risks have been mitigated against.

**Griffin Trail Wind, LLC****Weather Related Hazards § 25.53(d)(5)****Weather Emergency Plan § 25.53(e)(2)(A)**

Version Control			
Version #	Date	Content	Action By
01	21-Mar-22	Original version	SP/CL

## 1. Identification of Weather-Related Hazards

Weather related hazards can include hurricanes, tornadoes, thunderstorms, lightning, hail, high winds, drought, flooding and extreme hot and cold weather. Through forecasting models, historical weather event patterns and weather alert services it is possible to identify and prepare for weather related hazards prior to their occurrence.

### **Texas Division of Emergency Management (TDEM)**

Griffin Trail Wind (GTW) uses the TDEM alert information and coordination calls as a source of weather-related hazard information. The Texas Weather Briefings given by the National Weather Service as a part of the TDEM coordination calls provide situational overviews, current advisories, and warnings for the state. The timings and forecast locations of severe storms, flooding and fire events are given along with a confidence rating in the forecast.

### **WeatherSentry (DTN)**

GTW subscribes to the forecasting tool WeatherSentry (DTN) which provides weather alerts, radar and daily planners customized to GTW's location. These alerts include 36-hour ahead, detailed hourly forecasts and warning triggers for all weather conditions. With this tool GTW can see the times and locations of the forecast weather hazard.

Both weather-related hazard forecasting services/sources assist GTW in making its decisions on what actions to take to ensure continued operations and when to invoke its Emergency Operations Plan to respond appropriately to the weather event. It should be noted however that preservation of lives and the safety of personnel shall take precedence over all other considerations when determining the actions to be taken.

## 2. Operational Plans for Responding to Cold or Hot Weather Emergency Event

### **Response to Cold Weather Emergency Event**

Upon receipt of a weather advisory or other credible information indicating that a cold weather event is anticipated, GTW shall invoke the following process:

- Carry out an immediate check of cold weather preparedness using the GTW Cold Weather Preparation Checklist (Image 1), Griffin Trail Supplemental Winter Preparation Checklist (Image 2) and GTW Backup Generator Checklist (Image 3) (as per Standard Operating Procedure GTW320 Cold Weather Preparation and Operations), unless the Checklists were carried out were carried out 30 calendar days prior to the weather advisory being received.



Image 1: GTW Cold Weather Preparation Checklist

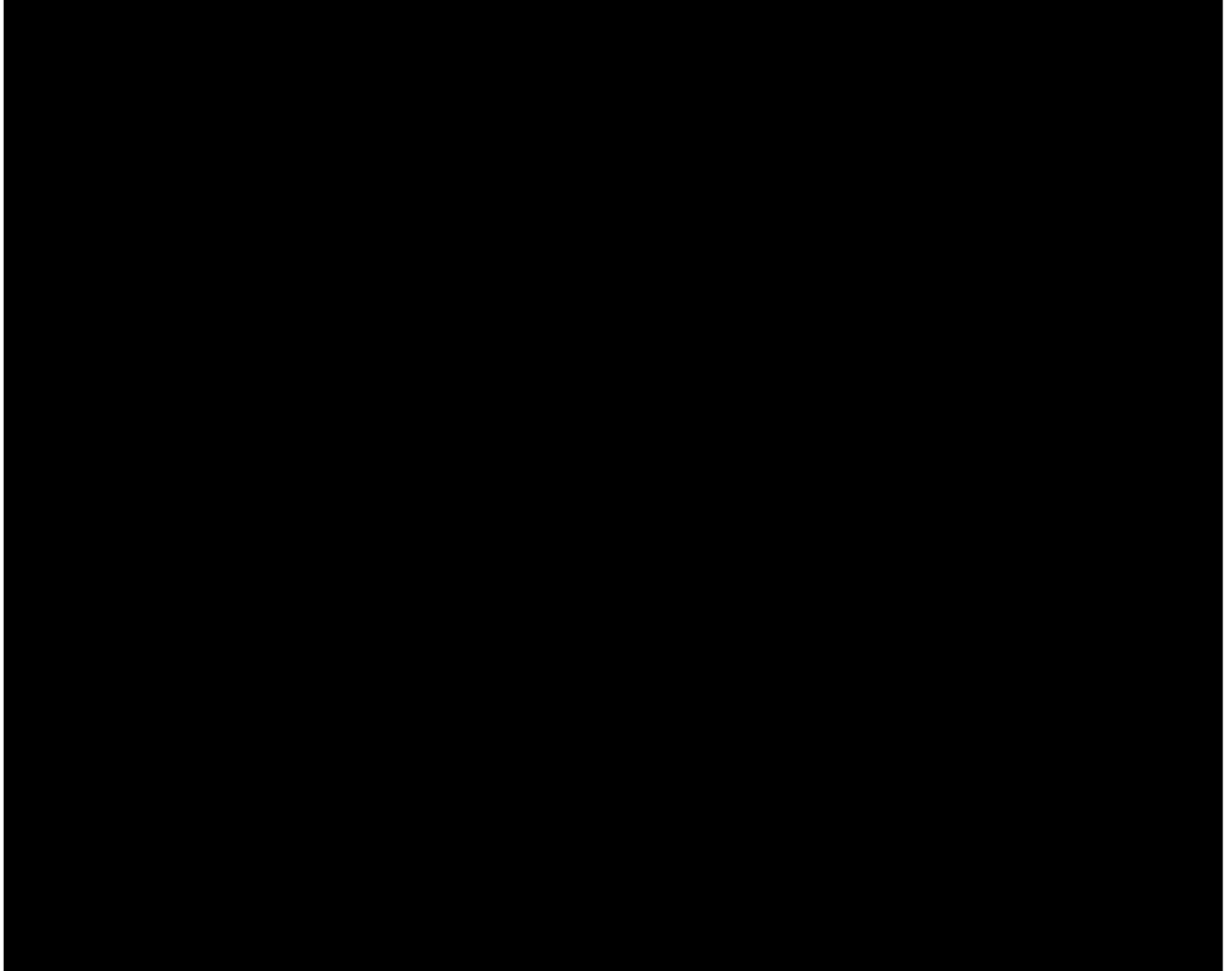


Image 2: GTW Supplemental Winter Preparation Checklist

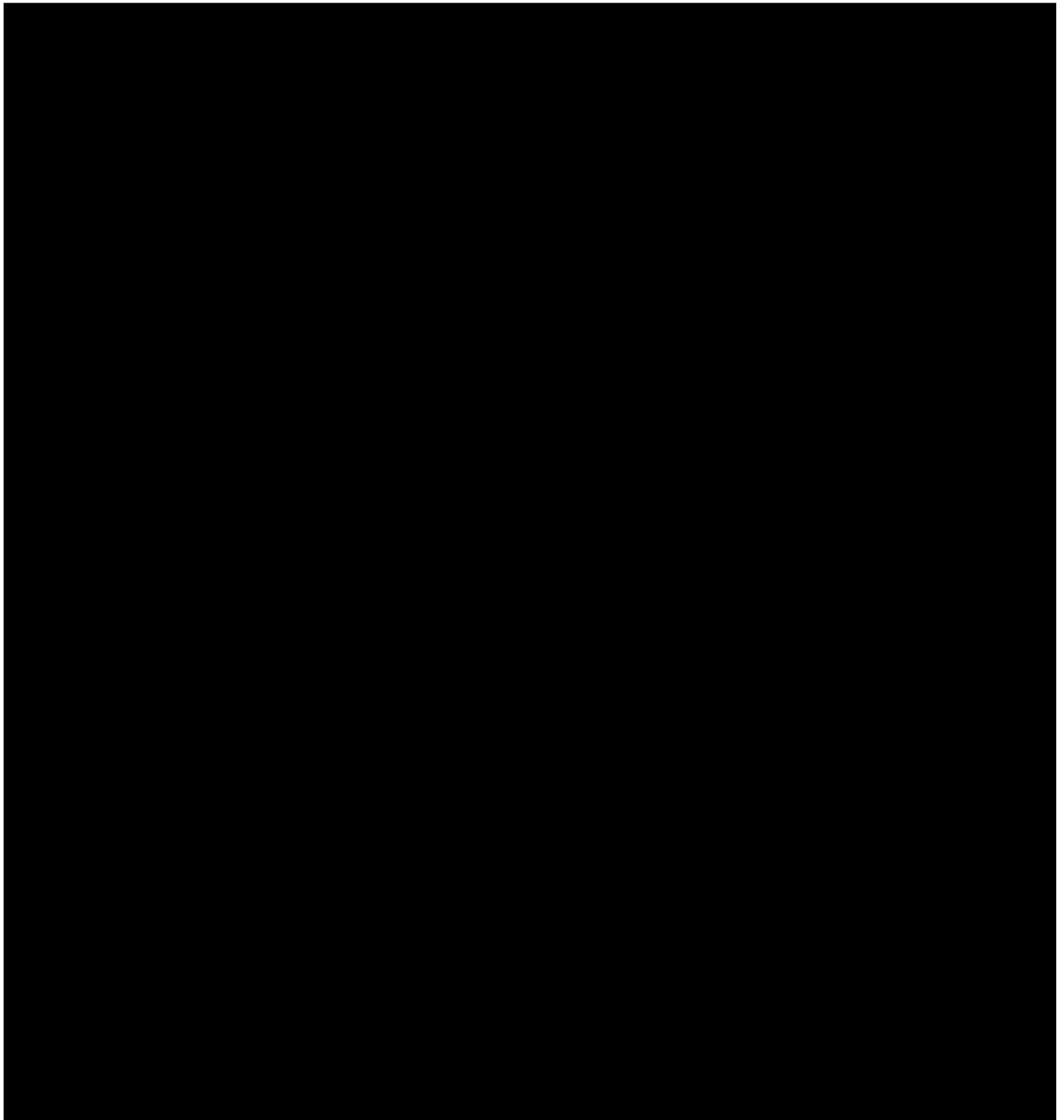
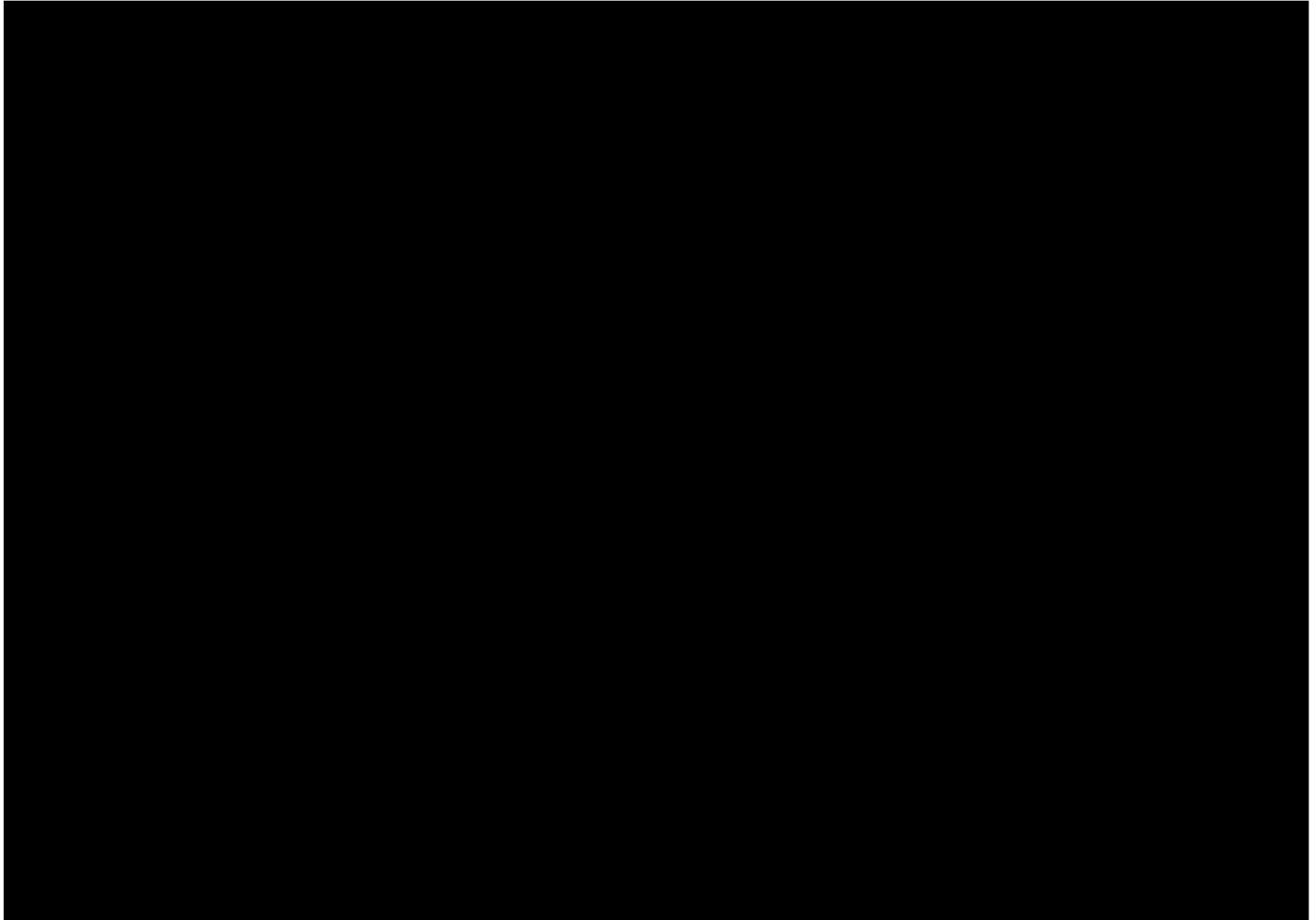


Image 3: GTW Backup Generator Checklist



Carrying out these checklists will provide a check of the operational condition of critical heating systems (the control room, O&M building) and ensure adequate supplies and cold weather PPE are readily available (see Appendix C Emergency Supplies).

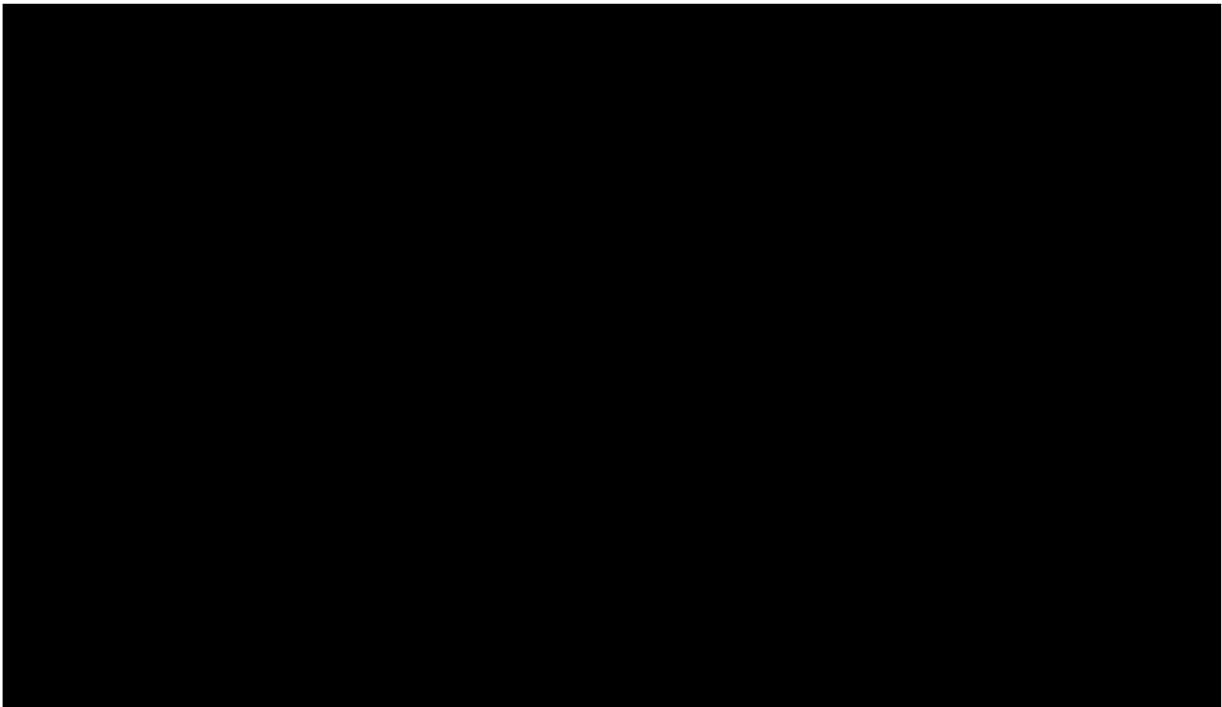
- Raise awareness (with site technicians) of critical SCADA points which are leading indicators of issues due to cold weather.
- Continuation of turbine inspections, monitoring for signs of ice build-up.
- Monitoring of road conditions.

### **Response to a Hot Weather Emergency Event**

Summers in the areas around GTW are typically hot. Normal maintenance activities are designed to ensure reliable operations during this operating season, therefore routine procedures are not outlined in this response plan. In all situations, instructions from the Qualified Scheduling Entity (Tenaska) and ERCOT will be followed with respect to output, curtailment, dispatch, etc.

Upon receipt of a weather advisory or other credible information indicating that a hot weather event is anticipated, GTW shall invoke the following process:

- Carry out an immediate check of hot weather preparedness using the GTW Hot Weather Preparation Checklist (Image 1) unless the Checklist was carried out 30 calendar days prior to the weather advisory being received.



Completing this checklist will provide the following information/assurances:

- A check of the operational condition of critical air conditioning systems (the control room, O&M building), and
- ensure that critical equipment within the substation, such as transformer cooling fans, is operating correctly.
- The site manager will ensure adequate supplies of bottled drinking water and electrolyte drinks are available and make sure that ways to identify and avoid heat-related stress and illness are incorporated into daily safety meetings.

It should be noted that lessons learned from extreme weather events are incorporated into the checklist process. This was last carried out with the Cold Weather Preparation Checklist, which resulted in additional checklists being implemented, in response to the February 2021 Winter Weather Event.

### 3. Fuel Switching Equipment

There is no fuel switching equipment installed at GTW.

**Griffin Trail Wind, LLC****Water Shortage Plan**

§25.53 (e)(2)(B)

Version Control			
Version #	Date	Content	Action By
01	17-Mar-22	Original version	SP/CL

## Statement of Non-Applicability

The water shortage plan is not applicable to Griffin Trail Wind, LLC (GTW) as the site does not rely on water for reliable operations.

Cases of potable water are provided for site personnel and supplied in enough quantity to ensure 72 hours of supply in event of an emergency.

**Griffin Trail Wind, LLC**

**Restoration of Service Plan & Business Continuity Plan**

§25.53 (e)(2)(C)

§25.53 (c)(4)(C)(v)

Version Control			
Version #	Date	Content	Action By
01	17-Mar-22	Original version	SP/CL

## 1 Restoration of Service Plan

Should the Griffin Trail Wind, LLC (GTW) generation facility fail to start or trip offline due to a hazard or threat, GTW will use its Switching Order GTW-SUB-EOP Restoration Re-Energization Procedure (see Attachment G.1) to restore service on site.

[REDACTED]

It should be noted that as GTW is not a Blackstart resource, the grid must be available in order for the site to generate. Further, as a renewable resource, wind is the only fuel for the site. Therefore, no priorities for recovery of generation capacity are presented.

## 2 Business Continuity

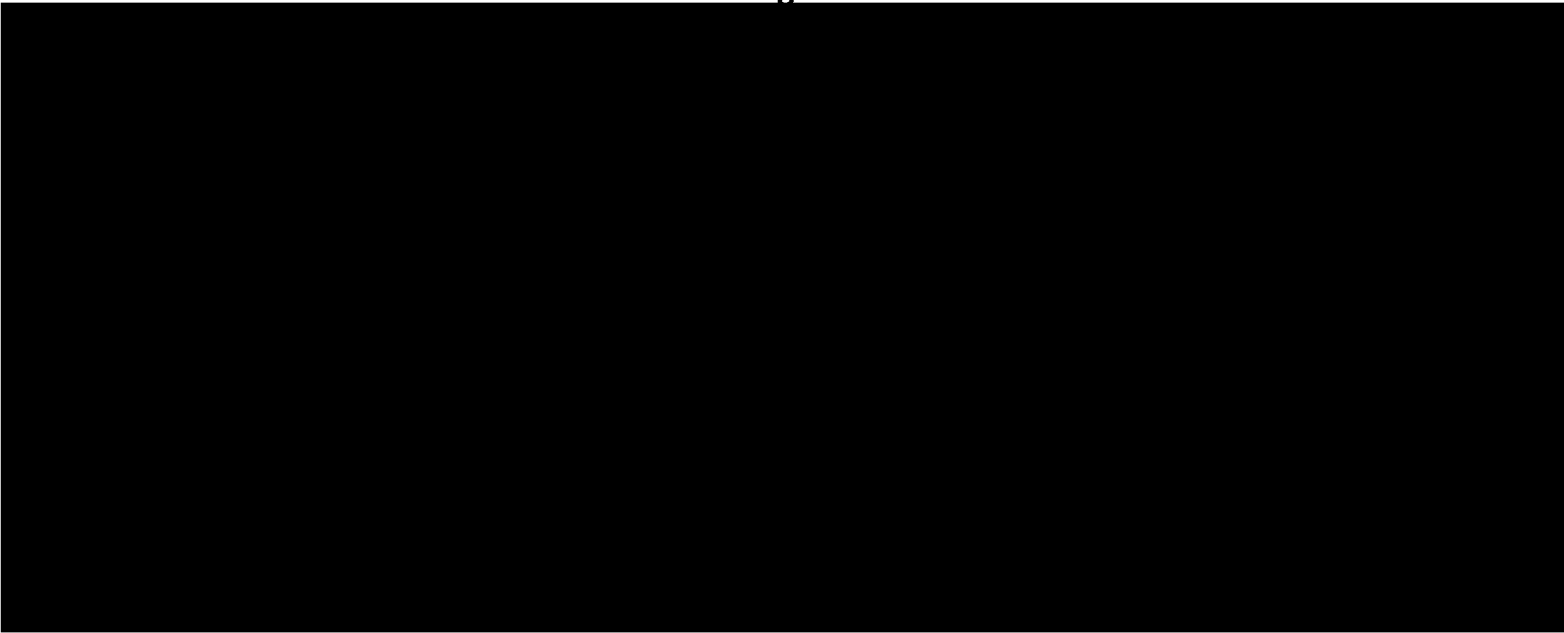
As indicated in Step #1 of the Switching Order GTW-SUB-EOP Restoration Re-Energization Procedure, for any situation that could impact Innergex Renewable Energy Inc. (Innergex) employees, the general public, facility production, surrounding ecosystems, or members of the community, the situation must be reported to the Person in Charge (PIC) who will follow the process of engaging the Innergex Crisis Management Team (if applicable).

\*Note that in no case can the safety of any site personnel be at risk due to the notifications required under this Plan.

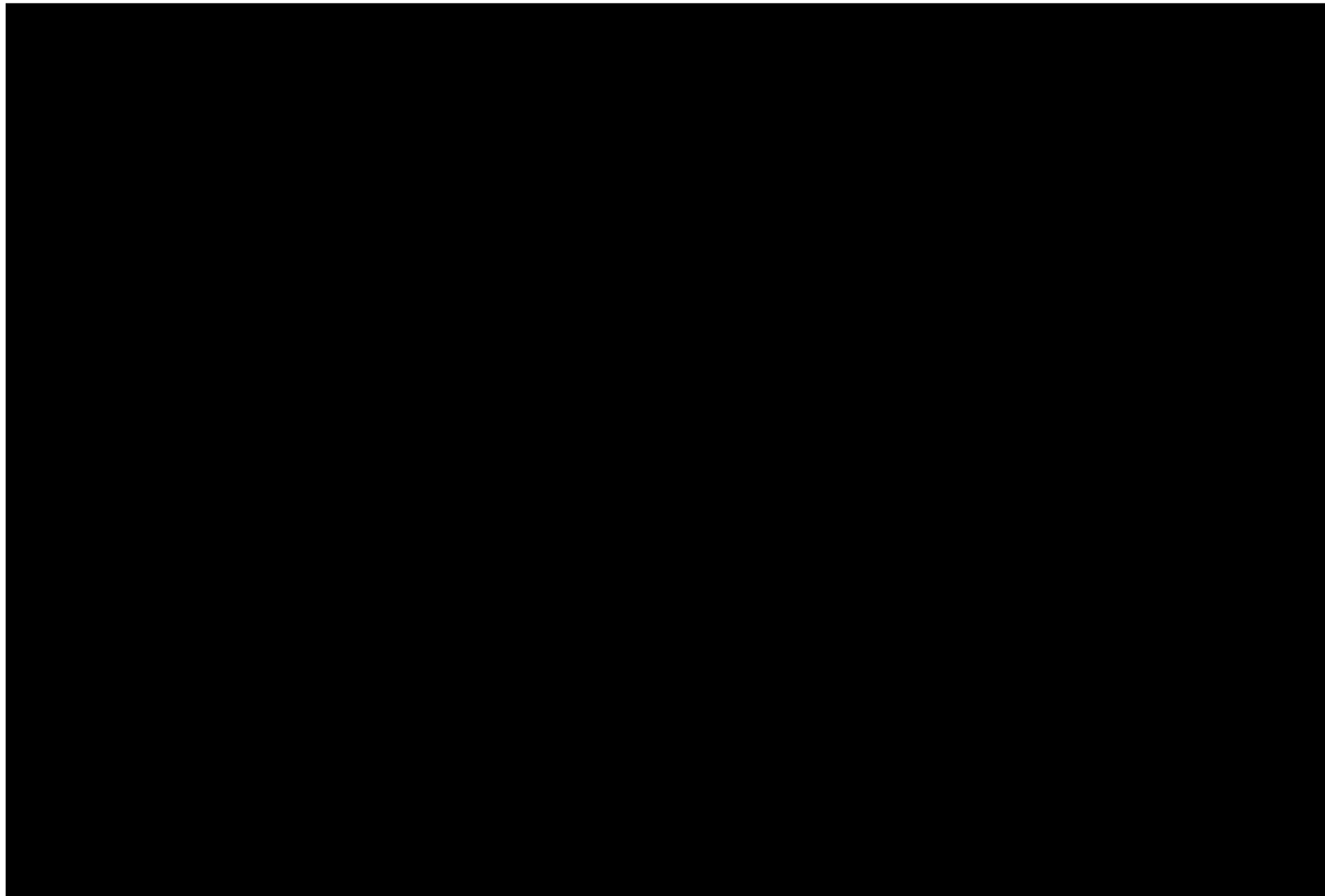
[REDACTED]



## Attachment G.1 – GTW SUB-EOP Restoration Plan



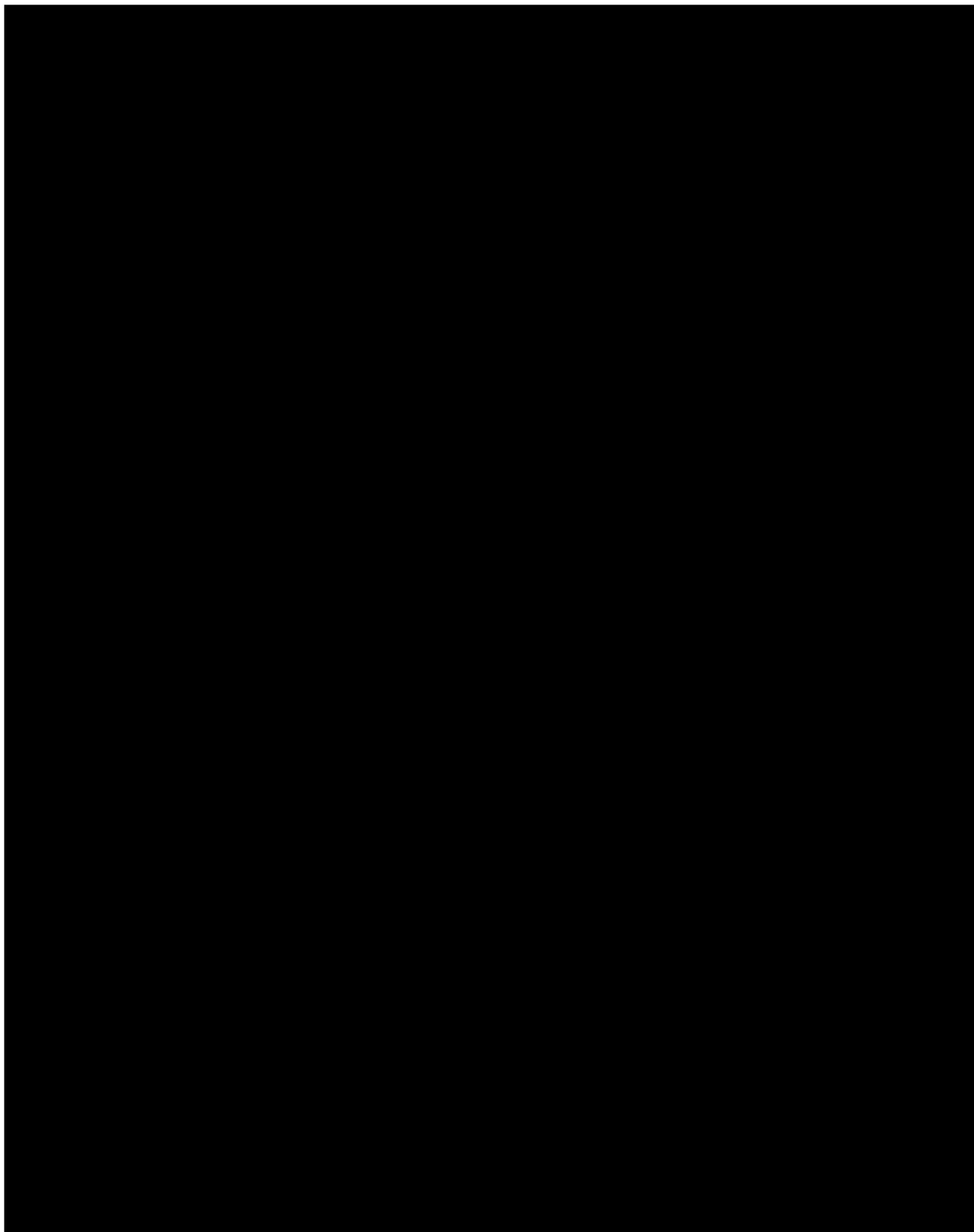


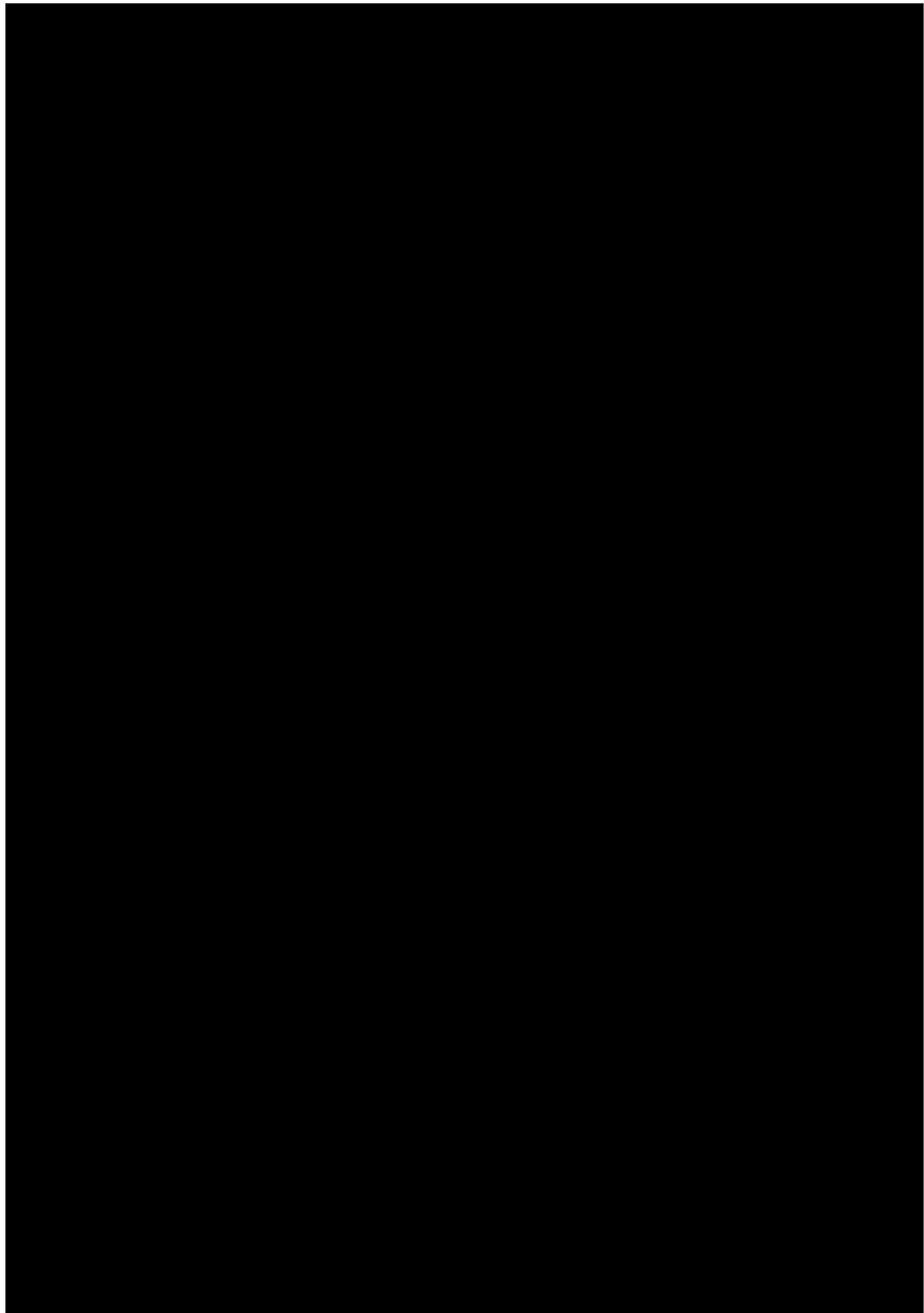


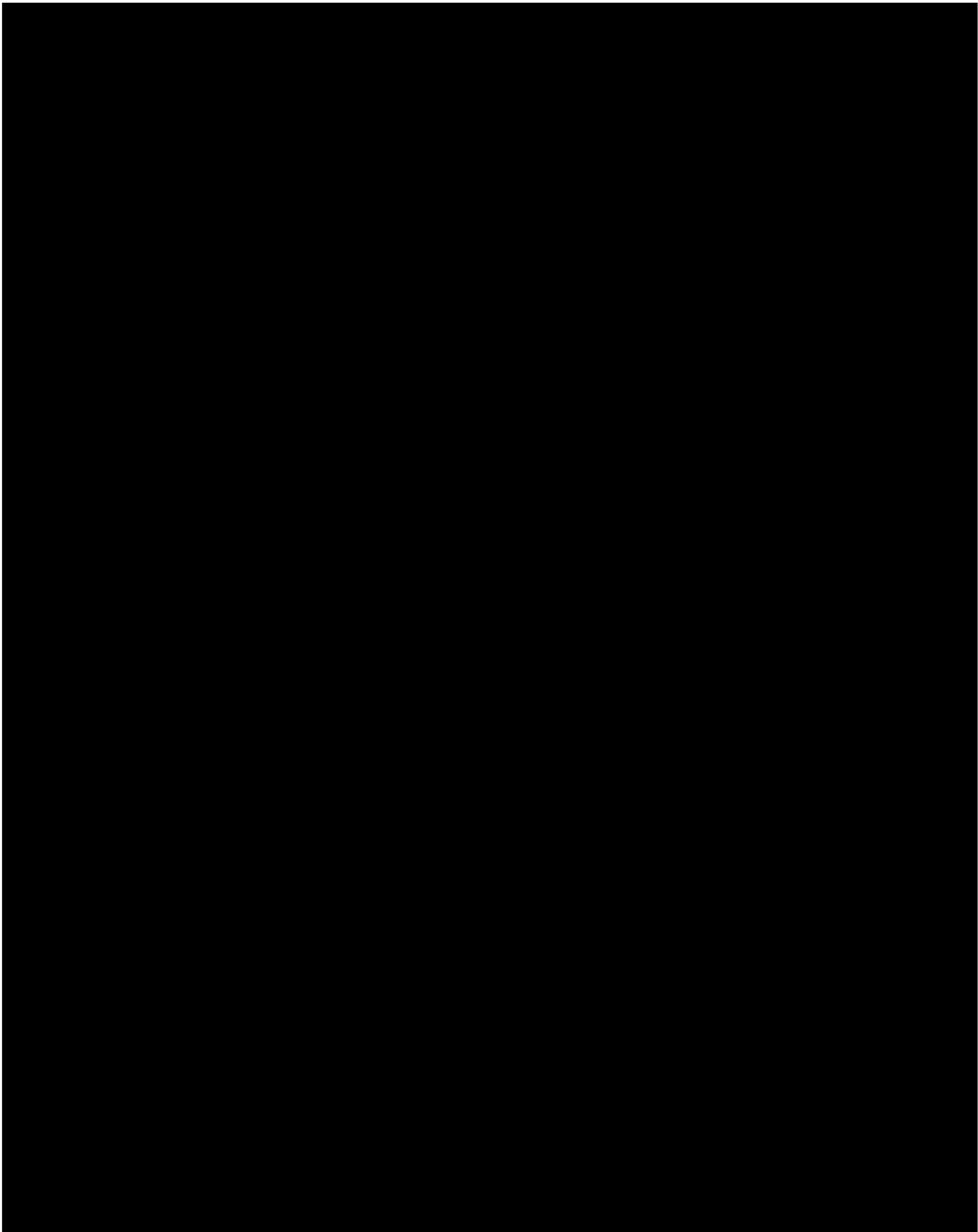
## Attachment G.2 – EHS1006 Corporate Emergency Management Guide

# **EMERGENCY RESPONSE PLAN**

## **Corporate Emergency Management Guide**





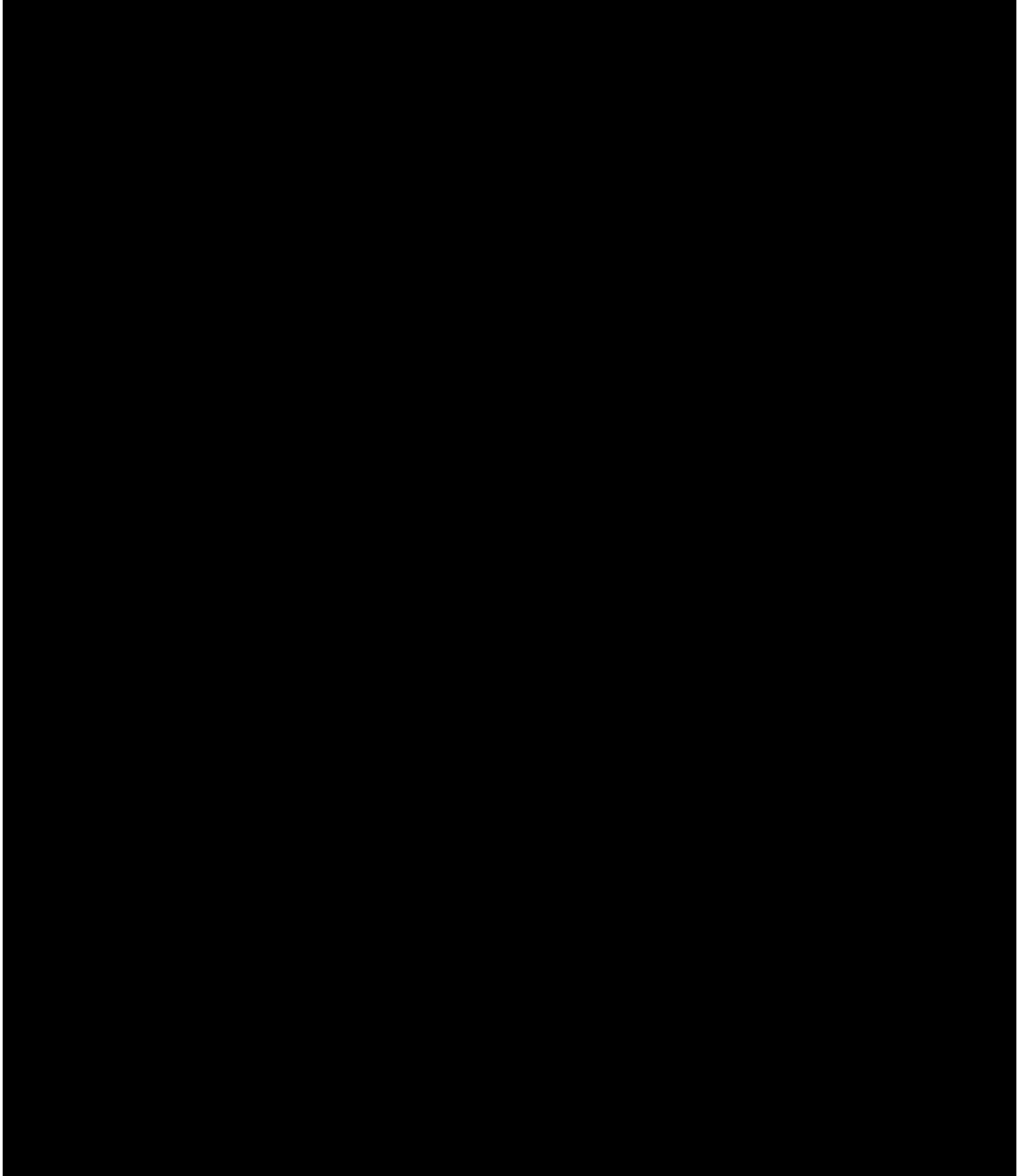


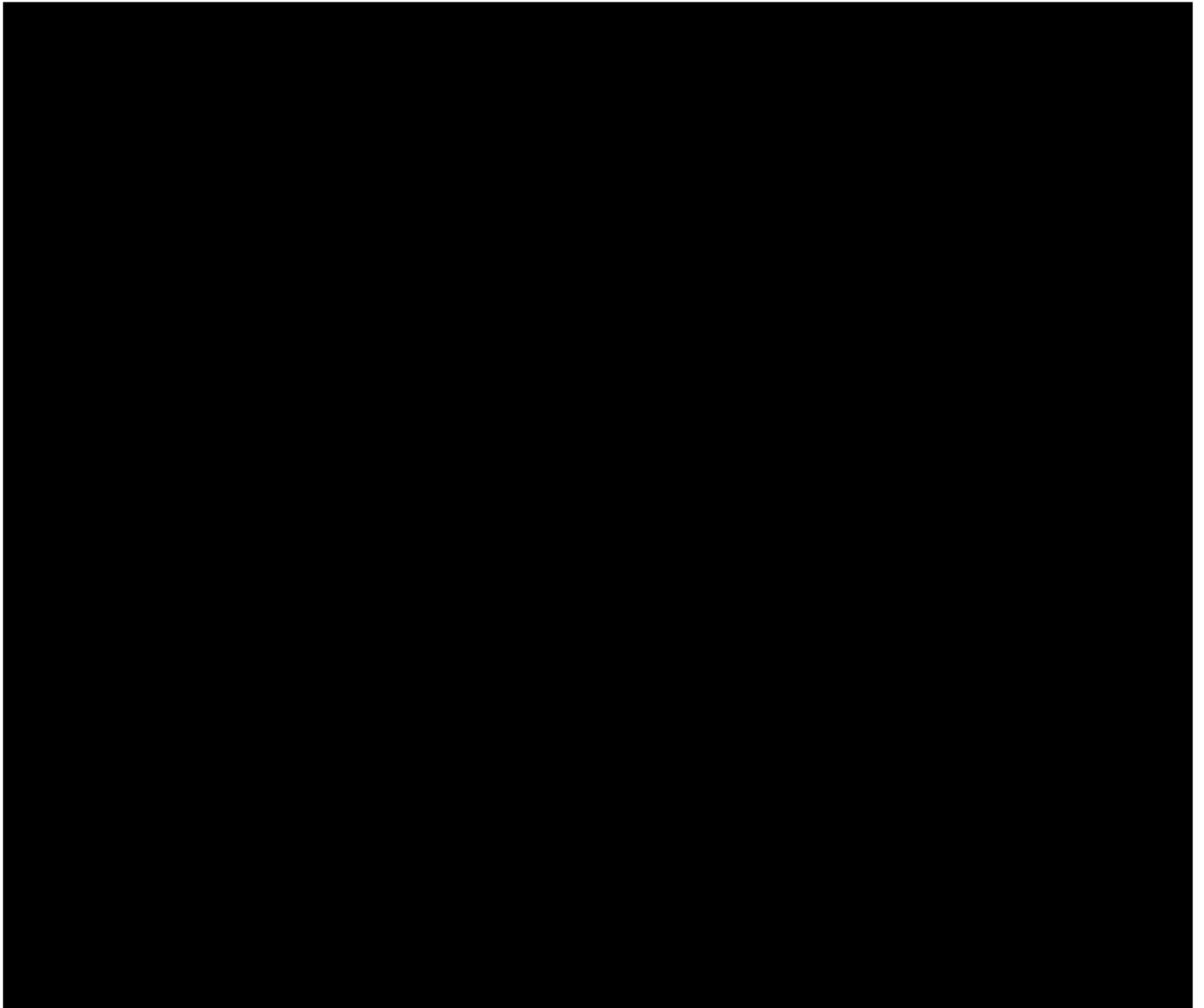




## **APPENDIX 1**

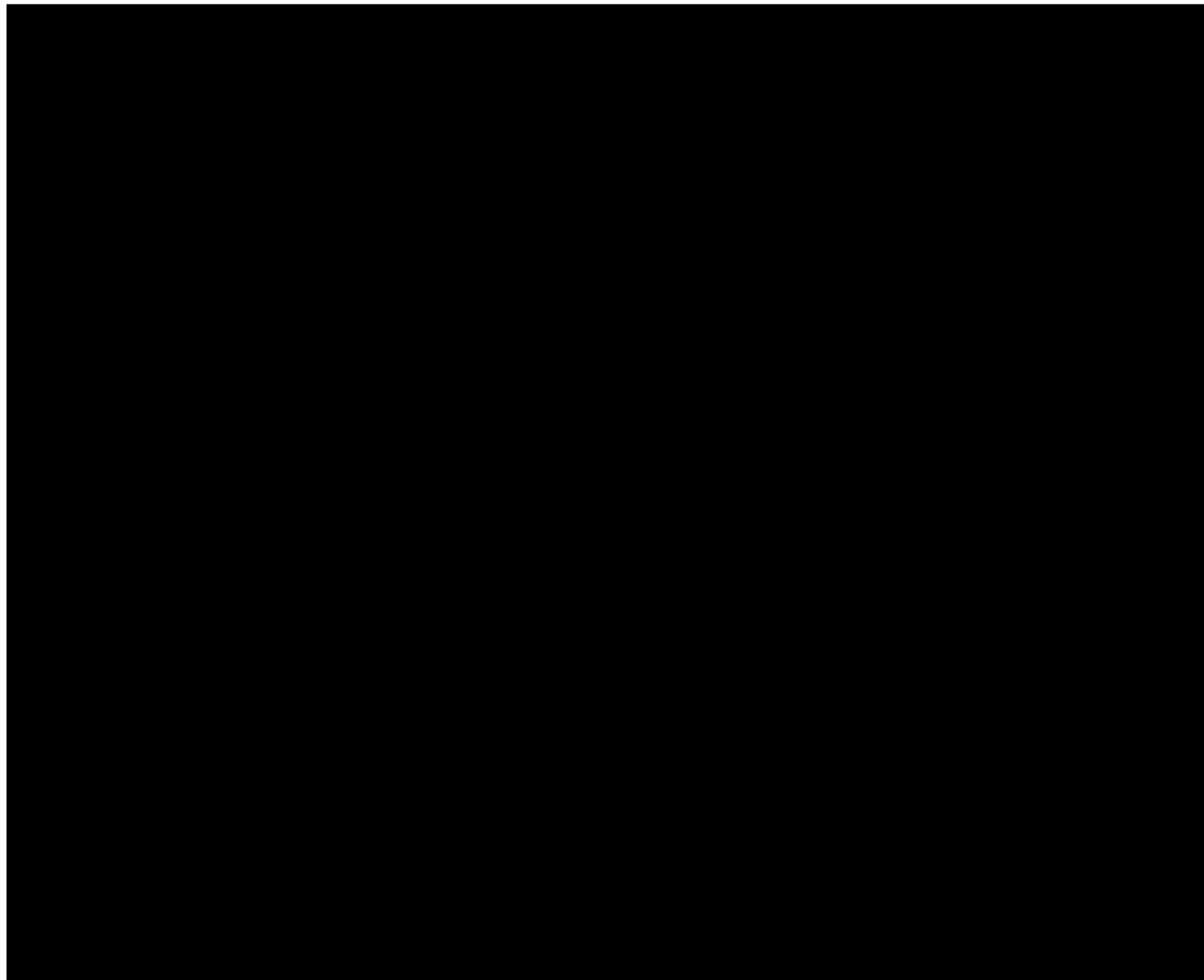
### **Crisis Assessment**





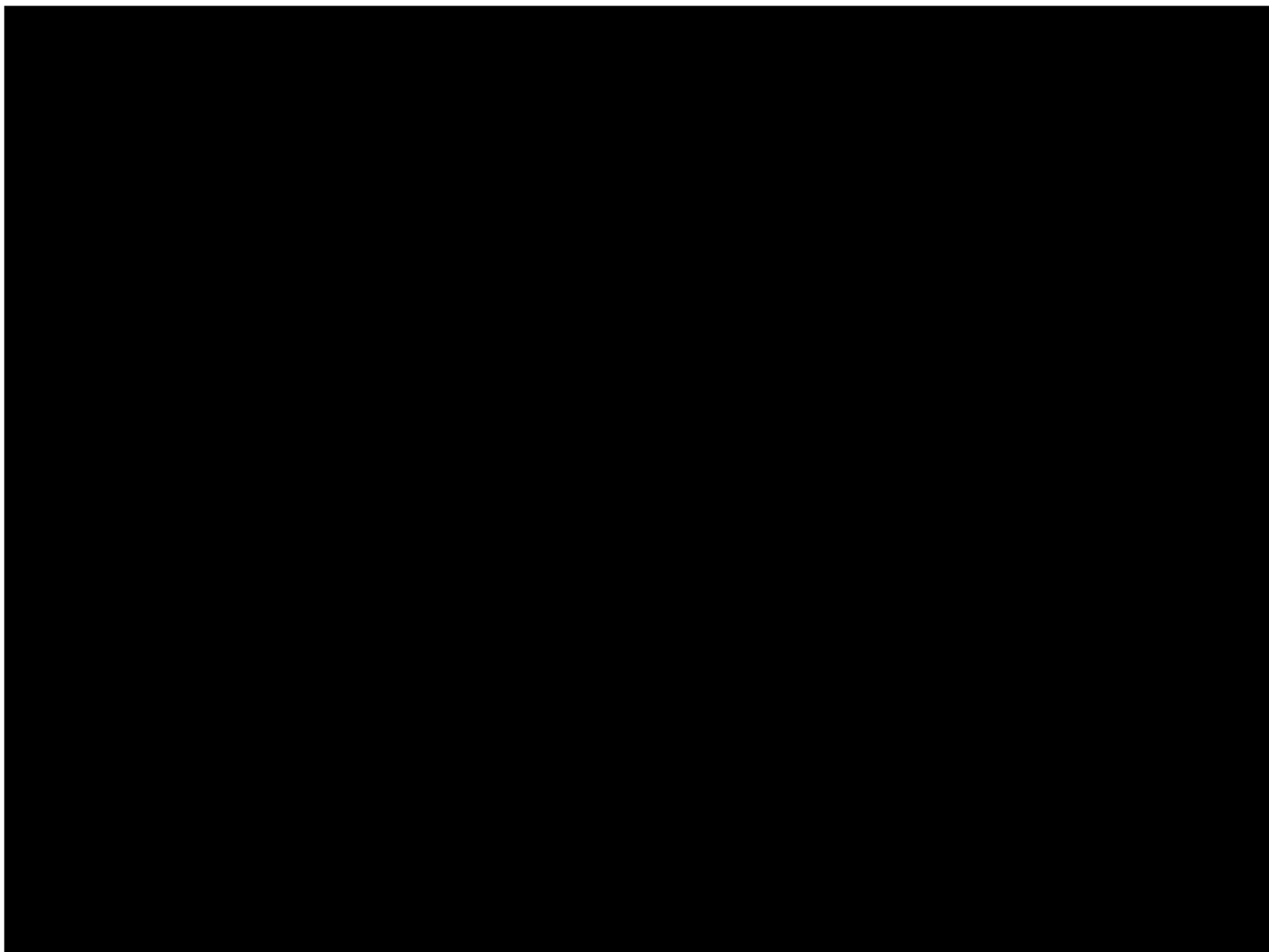
## **APPENDIX 2**

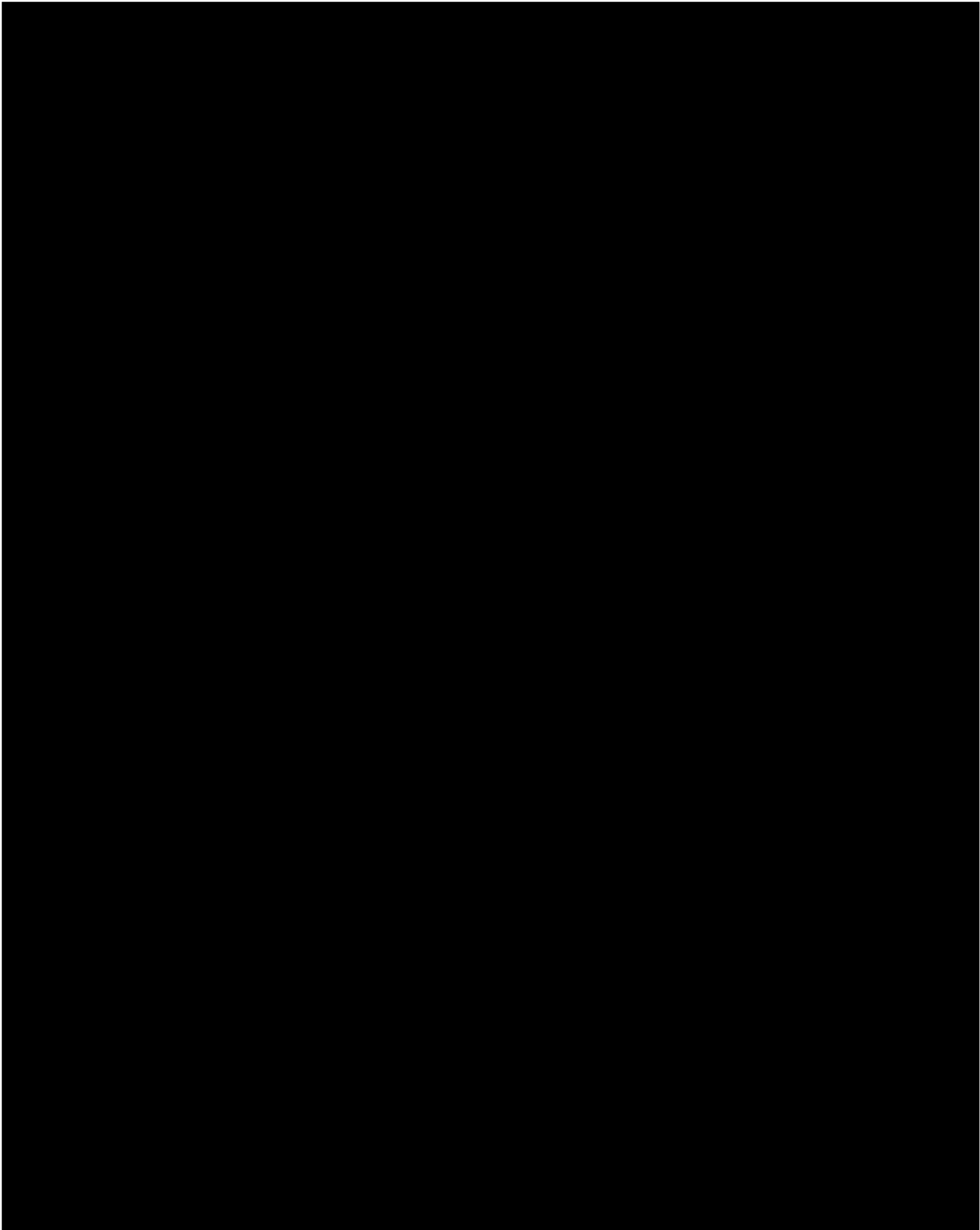
### **Crisis Information Form**

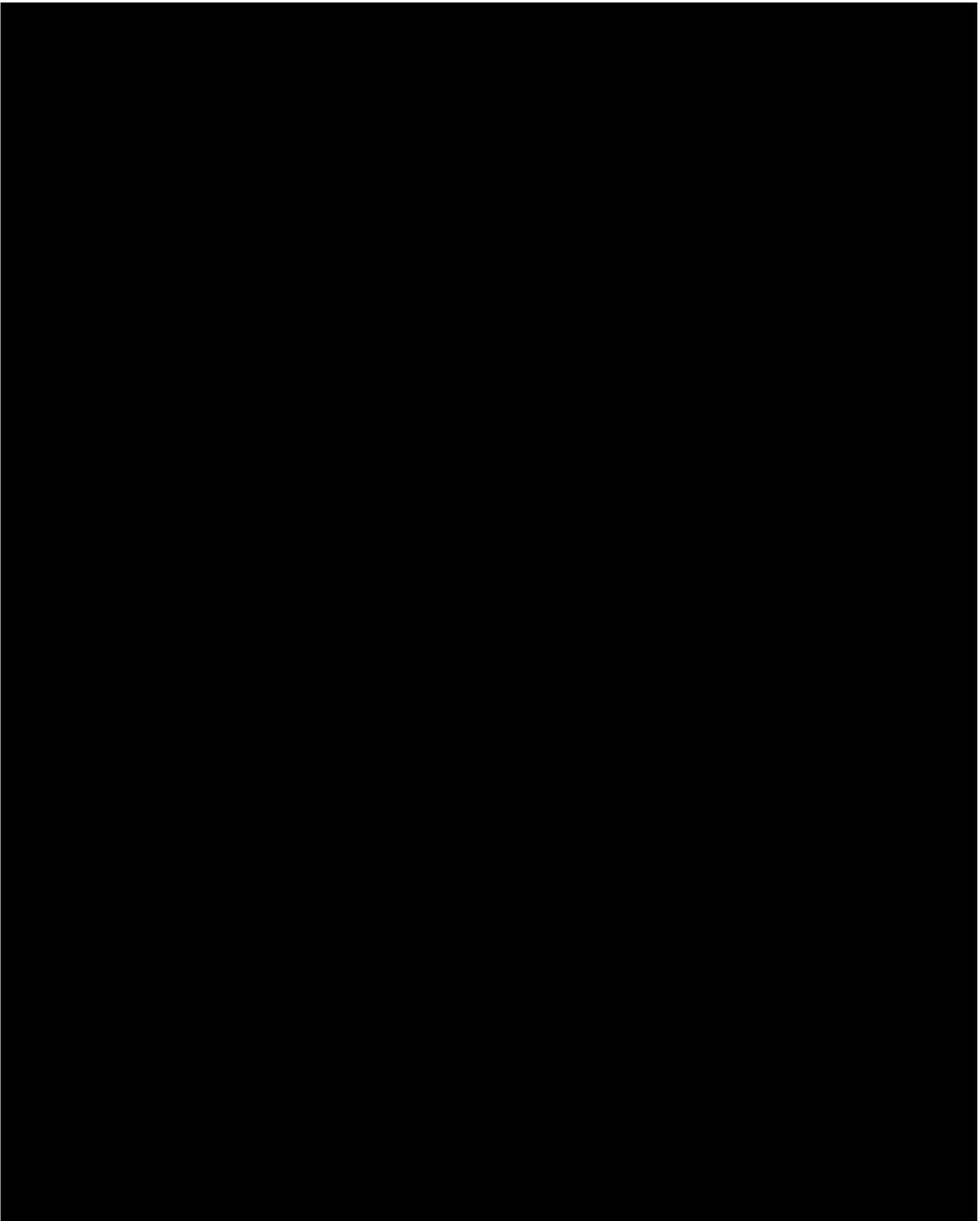


## **APPENDIX 3**

### **Task List by VP**





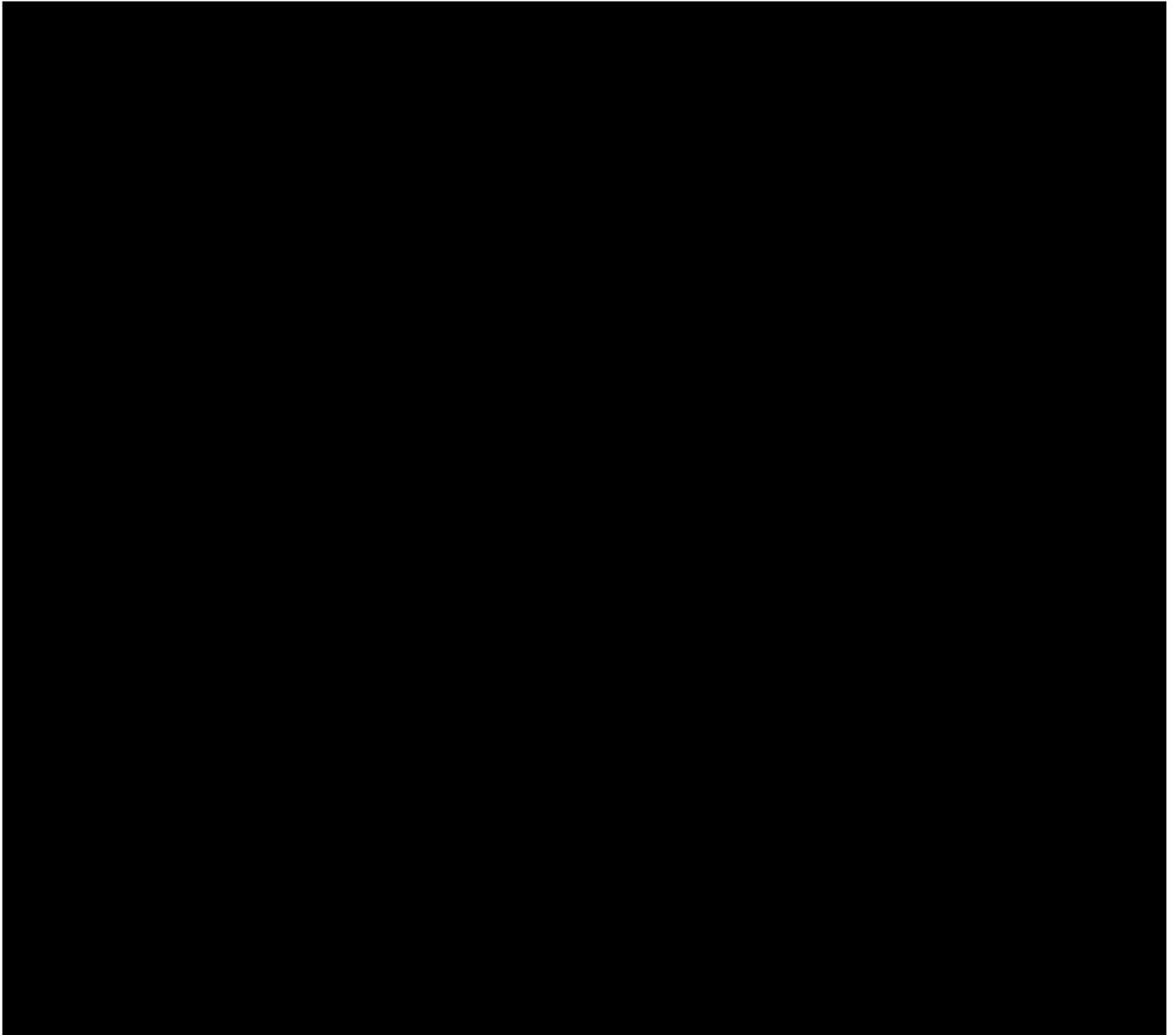


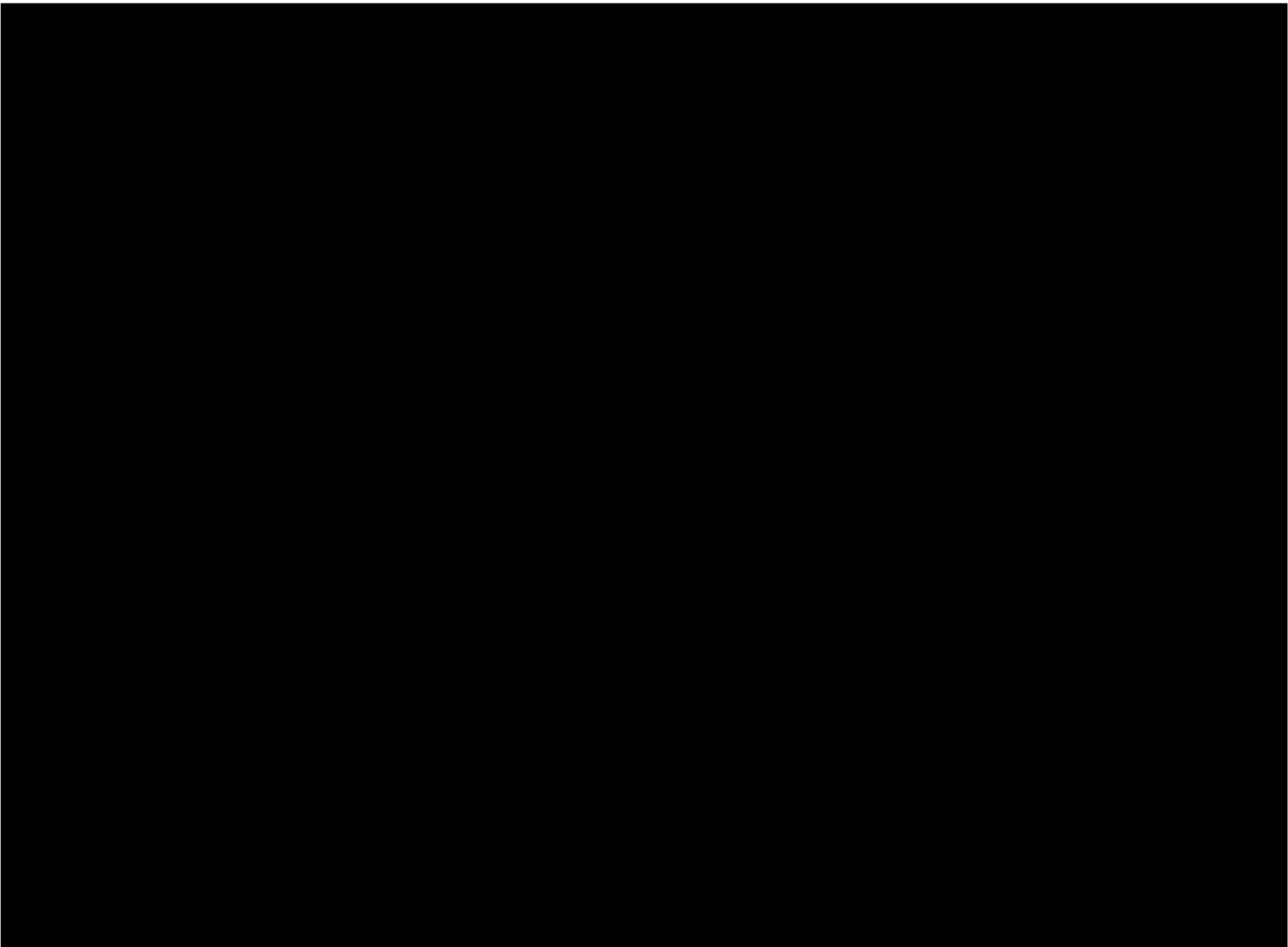




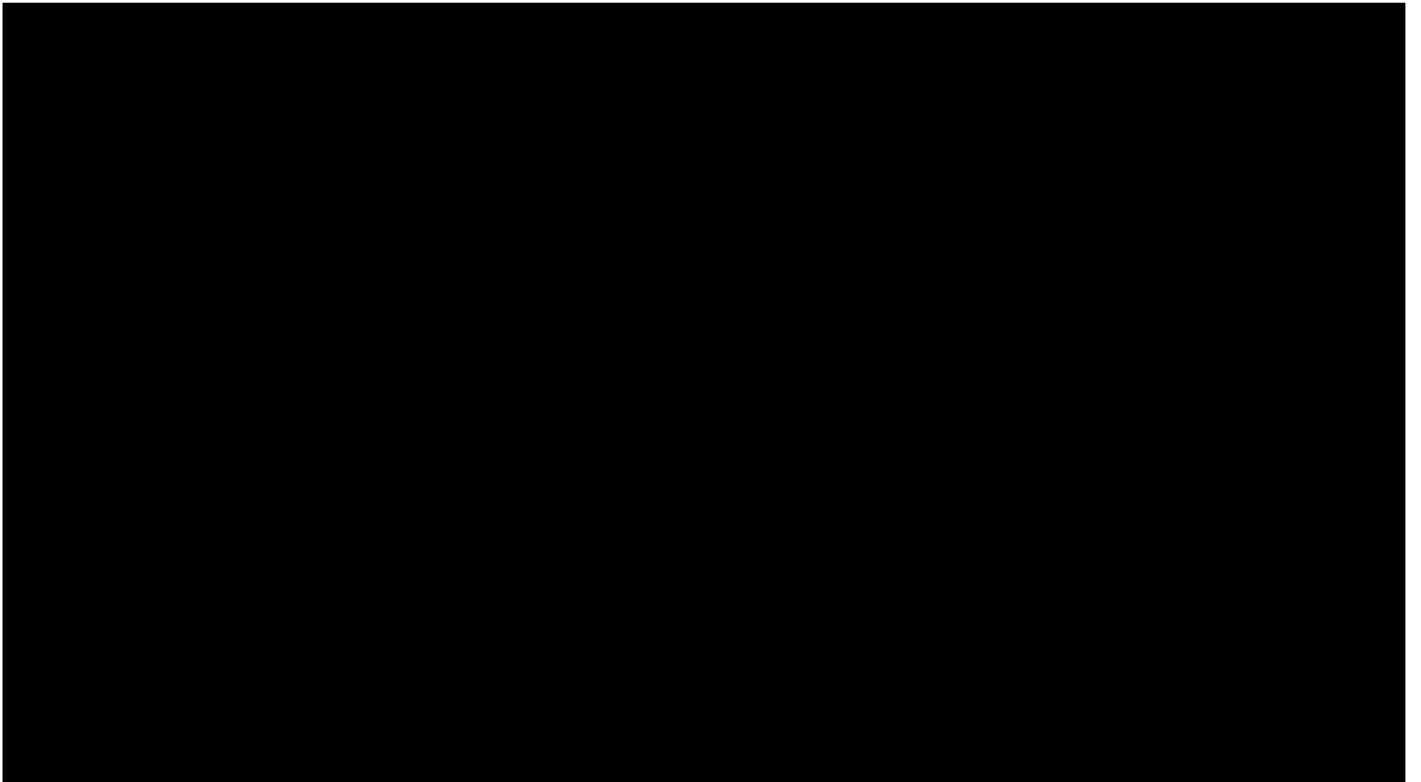


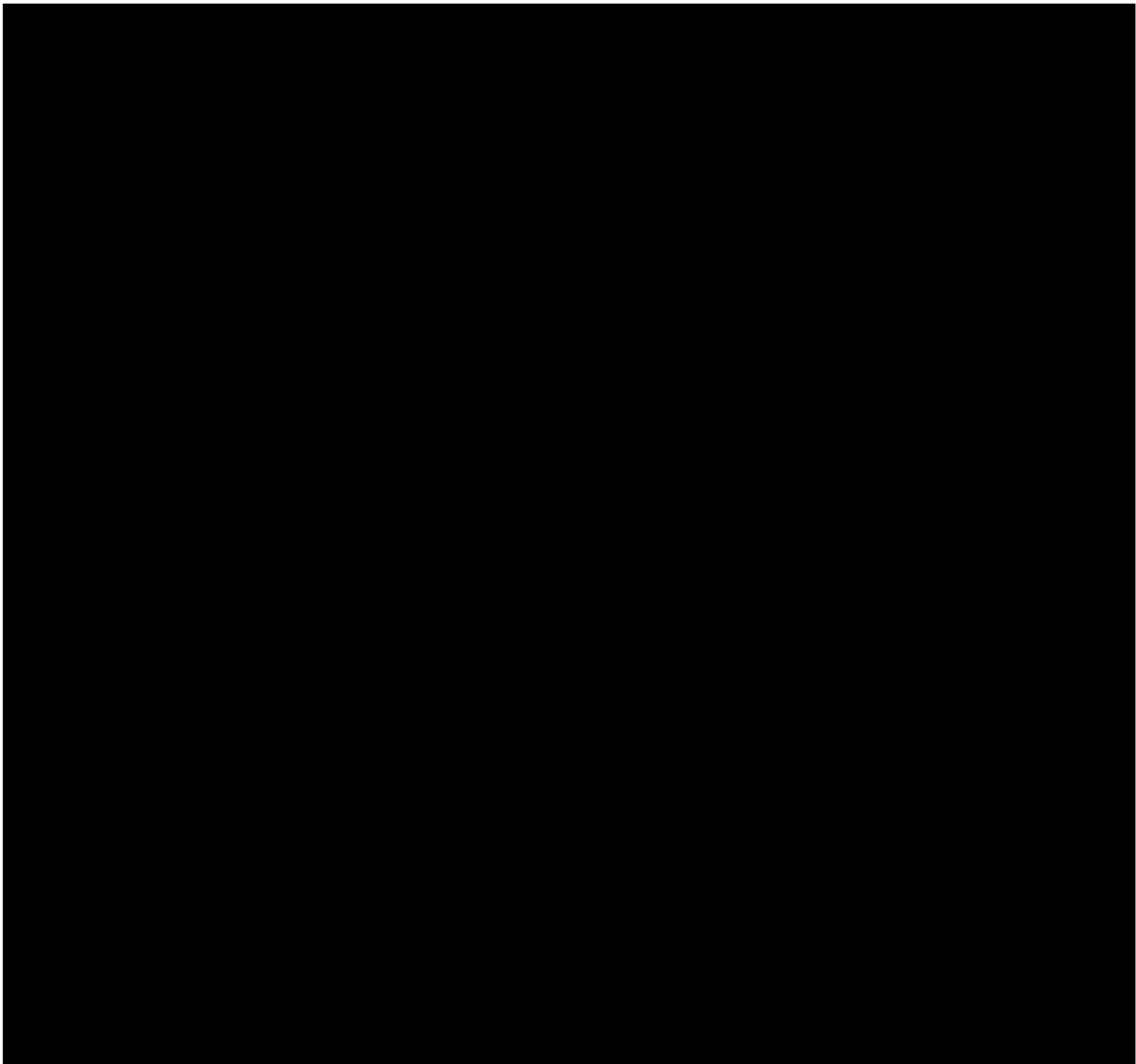






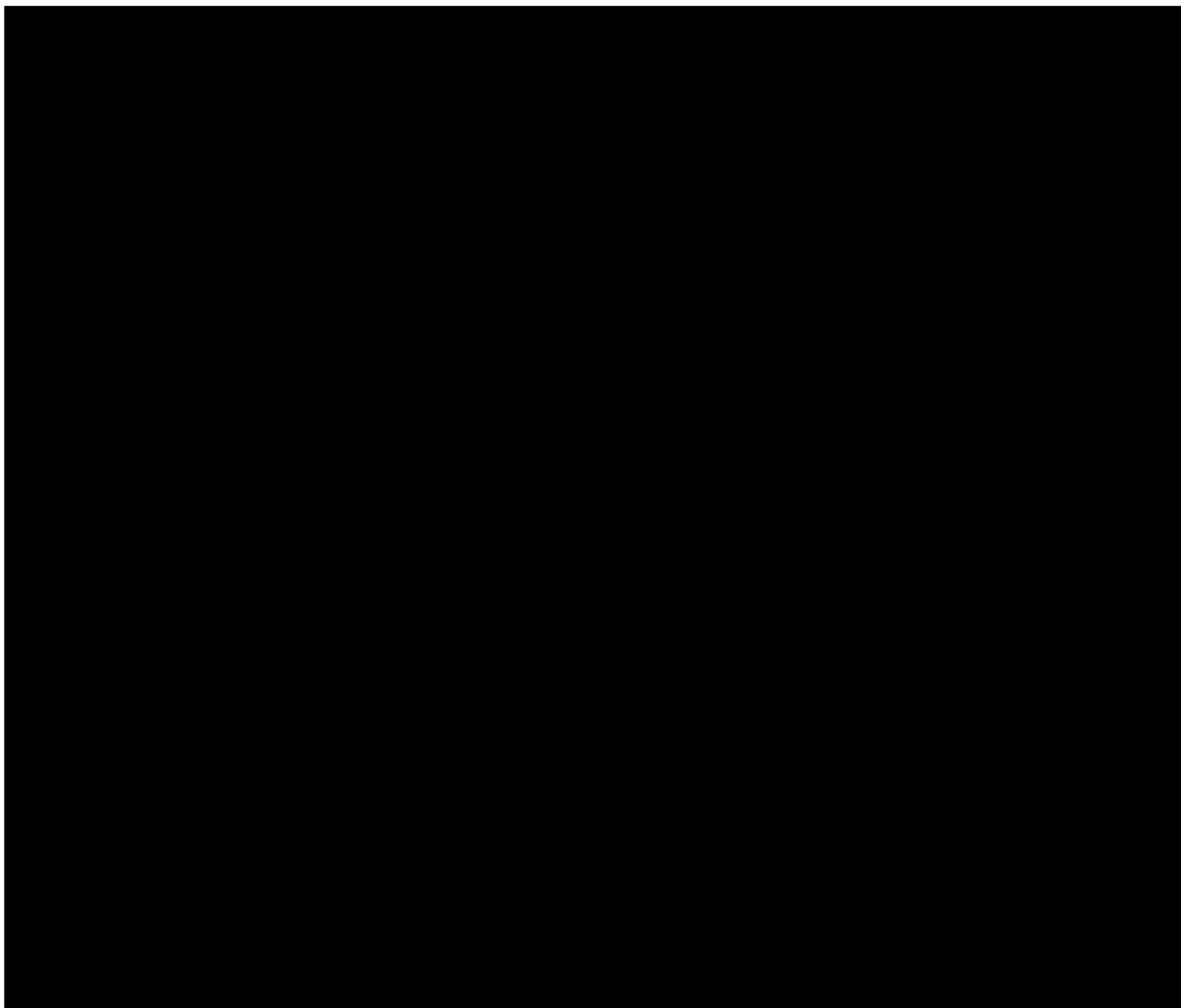






## **APPENDIX 4**

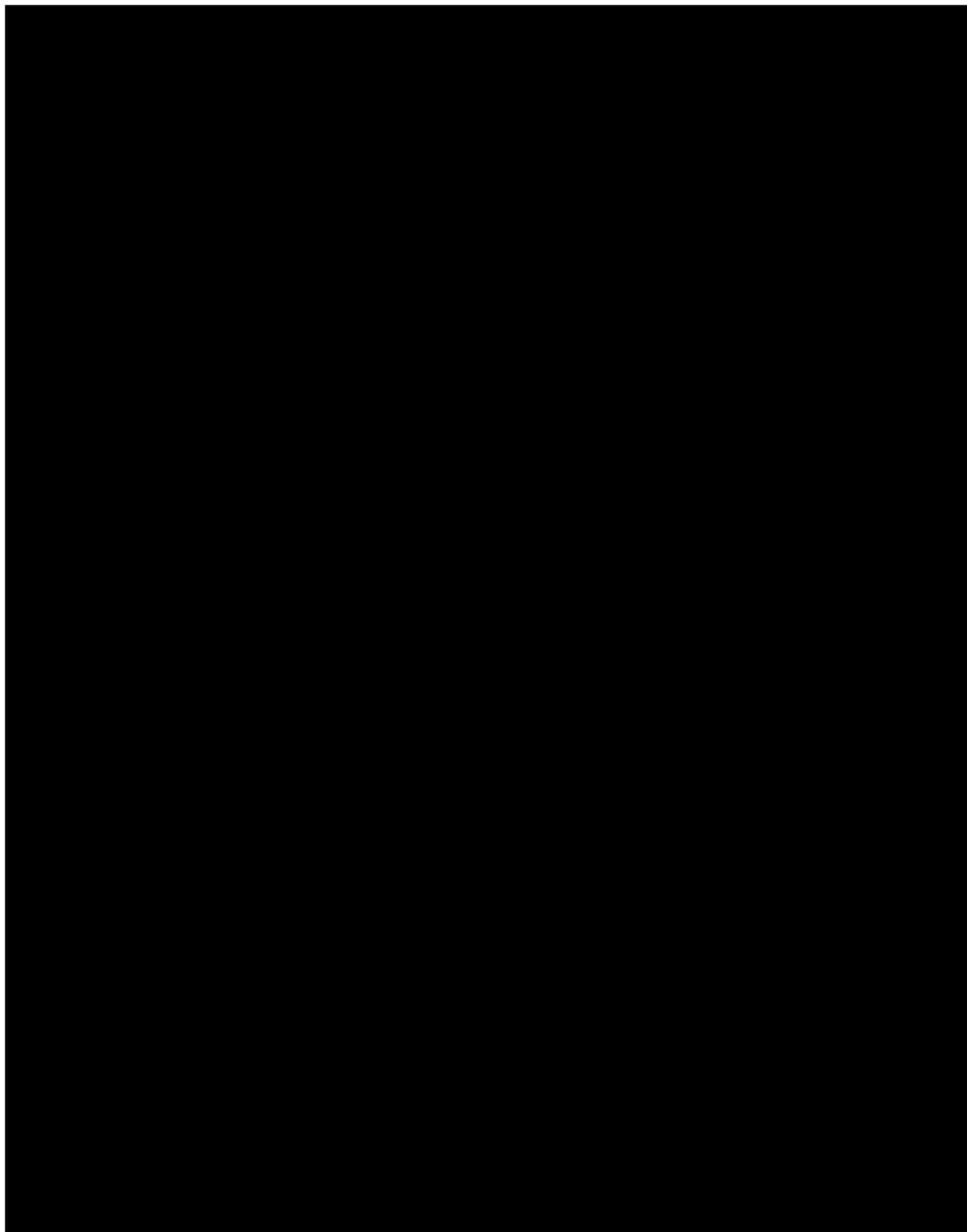
### **Crisis Management Team Contact Information**





## **APPENDIX 5**

### **Major potential corporate emergency risks**



## **APPENDIX 6**

### **Crisis Management Flowchart**

SEE NEXT PAGE

[The following text is a dense, continuous block of illegible characters and symbols, likely representing a corrupted or redacted document. It contains no discernible words or structure.]

## **APPENDIX 7**

### **Decision Making Process in the Event of Ransomware**

