



Filing Receipt

Received - 2022-04-15 03:46:59 PM
Control Number - 53385
ItemNumber - 170

Phoebe Energy Project, LLC**Project Site Name: Phoebe Solar****Emergency Operations Plan**

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

Version Control			
Version #	Date	Content	Action By
01	19-Mar-19	Published version	SP
02	15-Mar-22	Update for new PUCT Substantive Rule §25.53	SP/CL

Revision Statement: Version 02 of the Phoebe Energy Project, LLC Emergency Operations Plan dated March 15, 2022, supersedes Version 01 dated March 19, 2019.

Background and Summary

Phoebe Energy Project, LLC (“PEP”), also known as Phoebe Solar, is a 250.0 MW_{AC} solar energy generating facility located in Winkler County, near Kermit, Texas. PEP consists of 87 Power Electronics HEM FS3000MU inverters and 767,988 First Solar Series 6 photovoltaic modules each with a rated capacity ranging between 0.395kW and 0.430kW. PEP also includes an Operations and Maintenance (O&M) building, substation, and associated infrastructure. PEP interconnects at the Dune Switchyard owned by Oncor Electric Delivery Company, LLC (“Oncor”). PEP is within the Electric Reliability Council of Texas (“ERCOT”) region.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Purpose

This suite of documents has been developed by PEP 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.

PEP 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;
- 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 PEP is a registered PGC with the PUCT, the requirements of §25.53 Electric Service Emergency Operations Plans is deemed applicable. This Emergency Operations Plan has been developed for the benefit of the Phoebe Solar facility and has been filed as per the requirements stated in §25.53(c).

Emergency Operations Plan Activation Process

The PEP 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 PEP 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/Lead Site Technician, 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/Lead Site Technician is responsible for execution of these plans.
- d. The Site Manager/Lead Site Technician 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/Lead Site Technician shall designate an Emergency Coordinator if the emergency requires personnel to evacuate. The Emergency Coordinator may be any qualified site employee.

- f. In the absence of the Site Manager/Lead Site Technician, 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 in operations for all staff, contractors and visitors to site.
- g. The Emergency Coordinator shall maintain radio communication with the Site Manager/Lead Site Technician and communicate the count of all evacuated, site and contract personnel.
- h. All personnel will be trained regarding fire routes and exits, the location and use of emergency equipment, and understanding and following these plans. All personnel who oversee contractors or visitors at the site shall ensure that they are familiar with these plans.

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

The PEP Emergency Operations Plan ("EOP") for the Phoebe Solar 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.

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 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 PEP, 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, PEP 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, PEP 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, PEP 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, PEP 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: PHOEBE ENERGY PROJECT, LLC

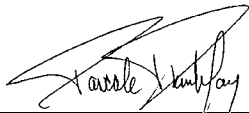
Project Site Name: Phoebe Solar

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 Phoebe Energy Project, 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 4 Texas Division of Emergency Management District Coordinators,
- V. that Phoebe Energy Project, LLC maintains an operations continuity plan (see Appendix G),
- VI. that the Phoebe Energy Project, 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

Phoebe Energy Project, 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
- PEP Phoebe Energy Project, LLC (Phoebe Solar)

2 Introduction

This plan outlines the requirements at PEP 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

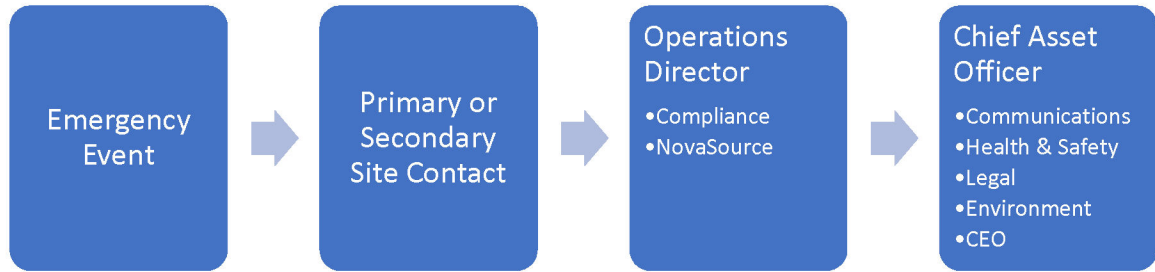
3.1 Internal Communications

3.1.1 Emergency Contacts

PEP 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, and the NovaSource Area Manager.

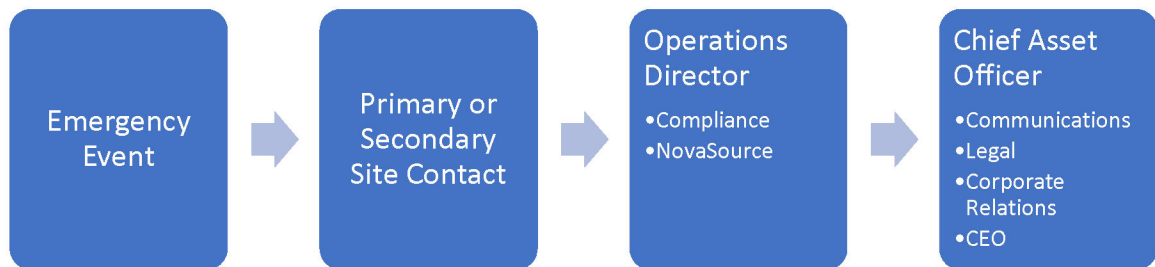
The Operations Director will report the situation to the Chief Asset Officer. The Chief Asset Officer must then inform Communications, Health & Safety, Legal, Environment and the CEO. It will then be the responsibility of these representatives to assess the emergency event to determine if the situation requires oversight by the Crisis Management Team.

Diagram 1: Internal Communications Flow - General



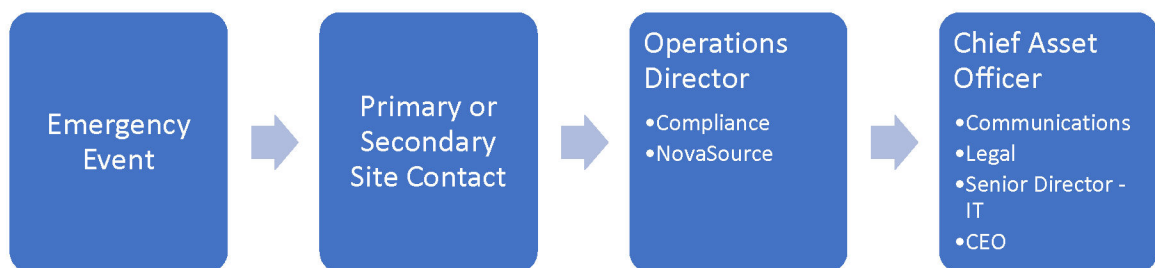
Should the emergency event concern a political, reputational, or commercial situation the following communications pathway should be followed.

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) prior to any statements being released.

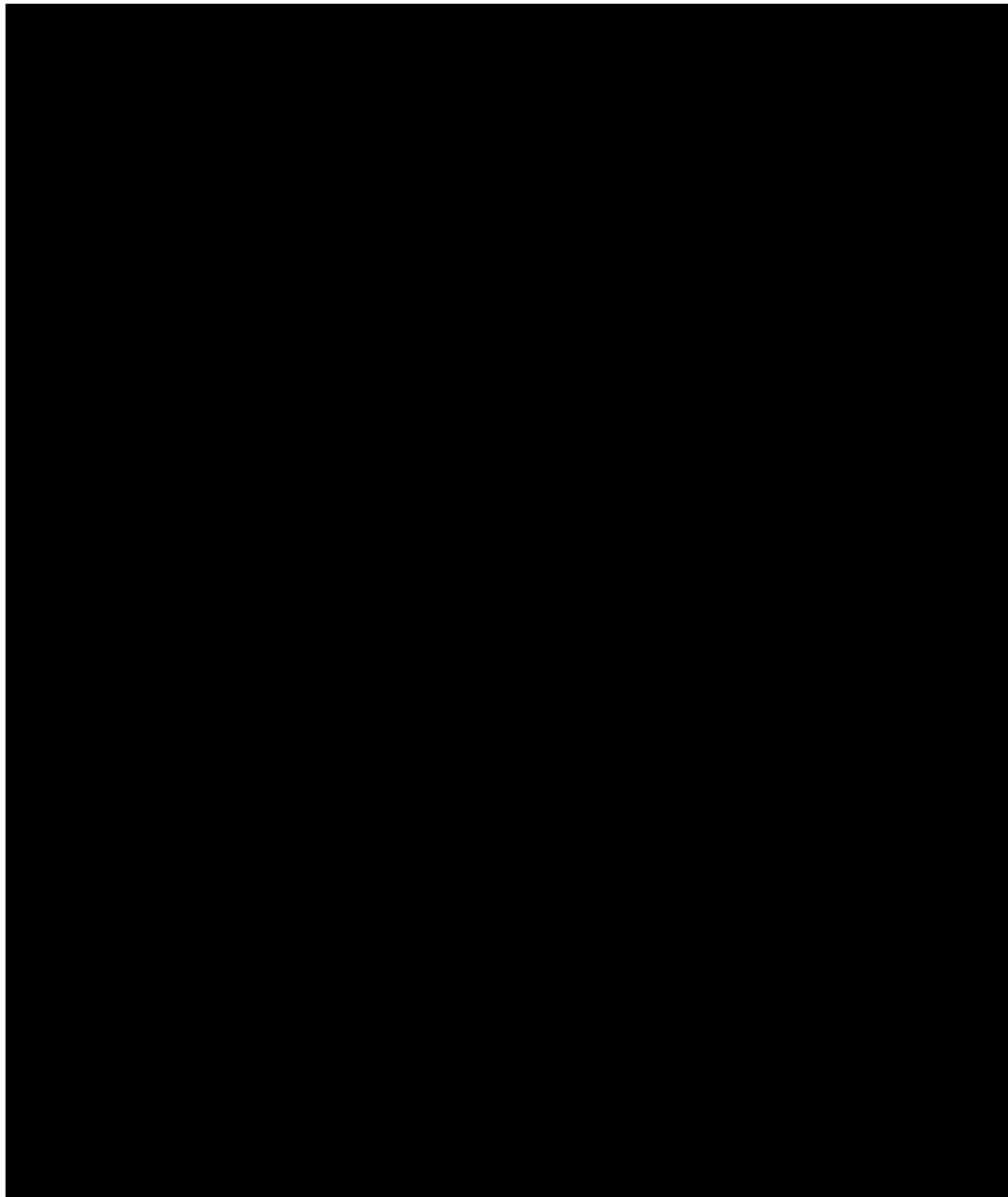
During an emergency event it is the role of Innergex Communications to develop key messages to be shared with the on-site team. Communications will take responsibility for the following tasks:

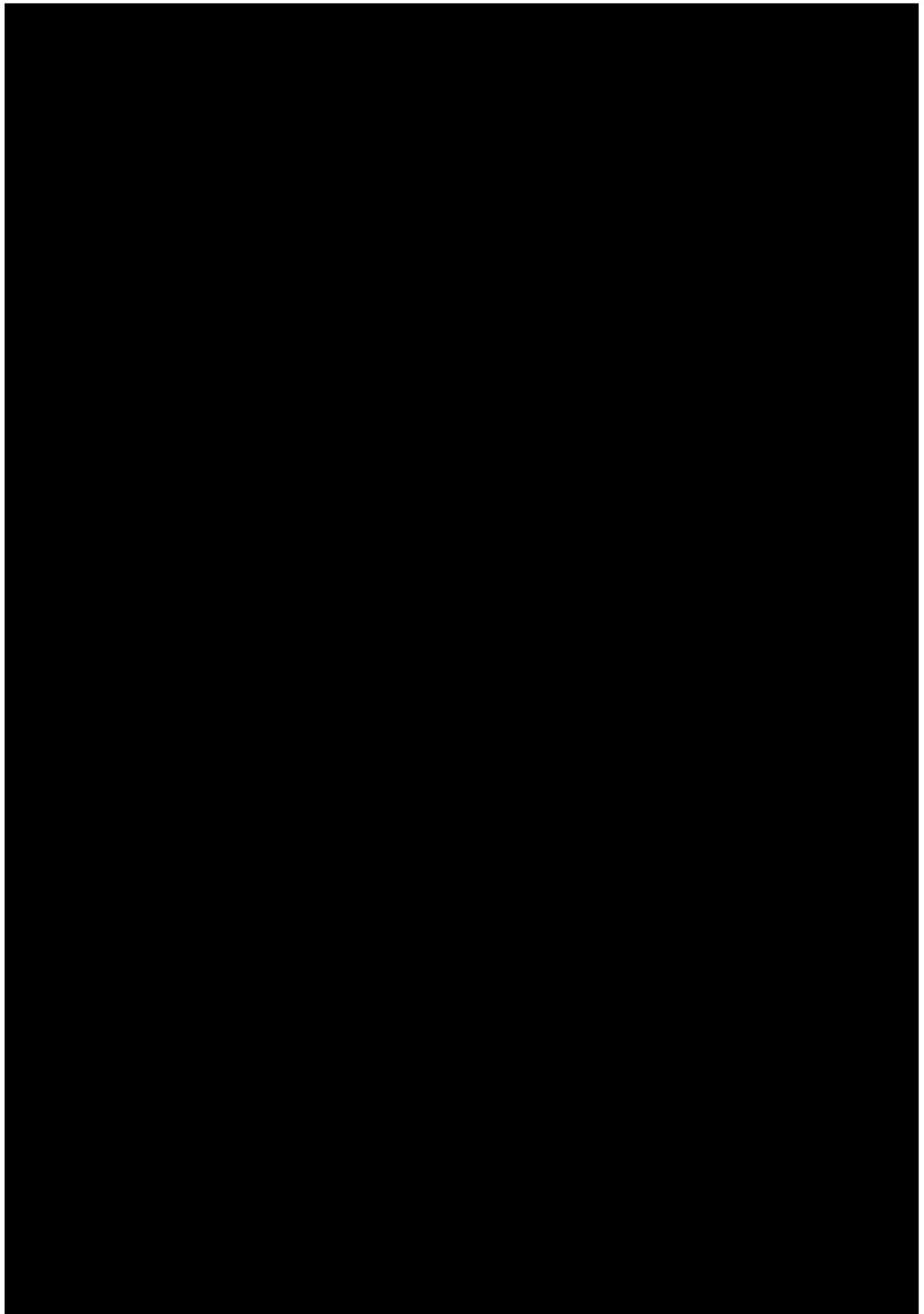
- Assessing media and social media emergency event potential and determine what response approach should be taken.
- Identifying local and regional media outlets.
- Receiving all media requests regarding the emergency event.
- Supporting a local designated spokesperson (should one need to be designated).
- 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.

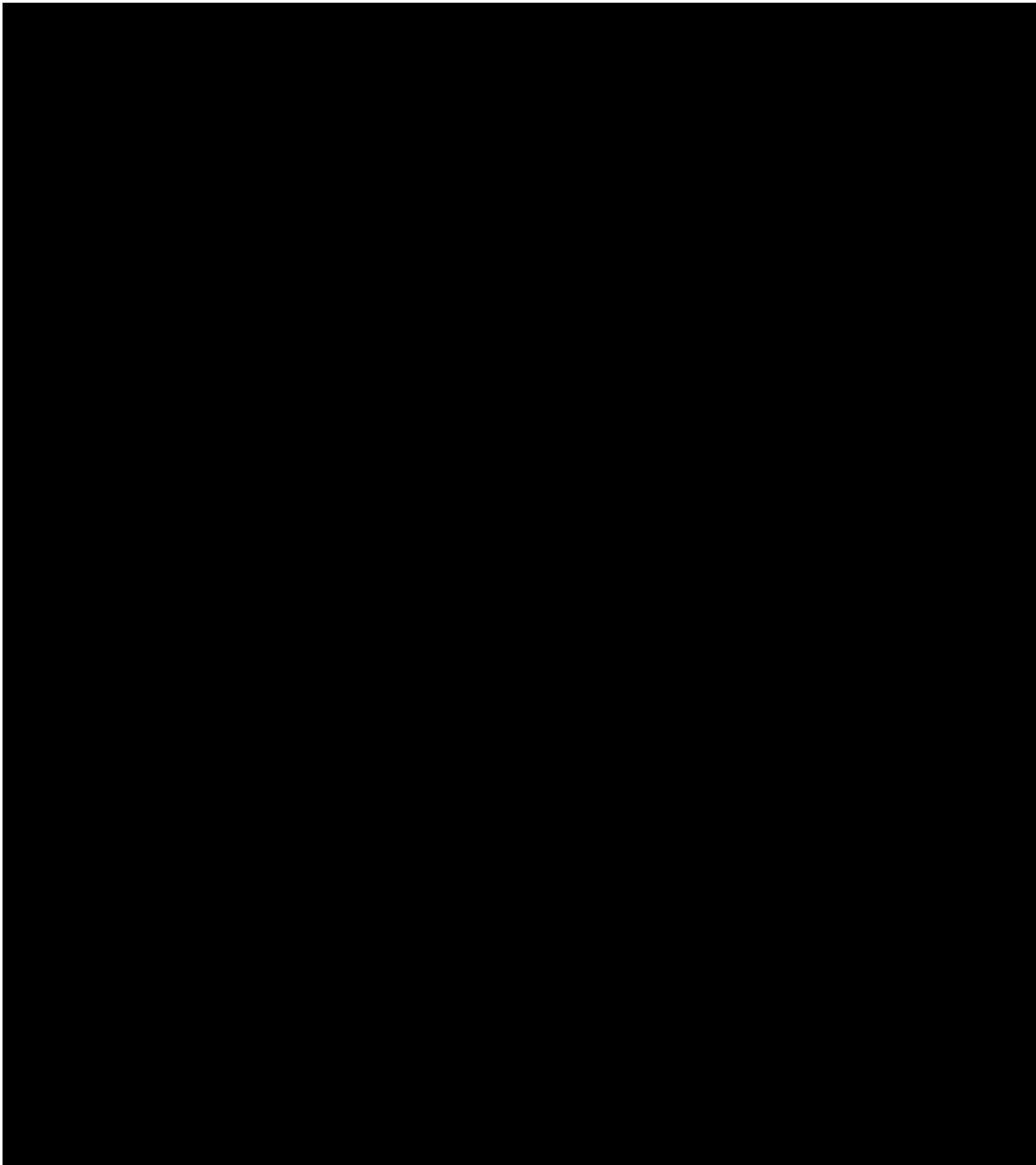
Attachment B.1 – EHS1006 Corporate Emergency Management Guide

EMERGENCY RESPONSE PLAN

Corporate Emergency Management Guide



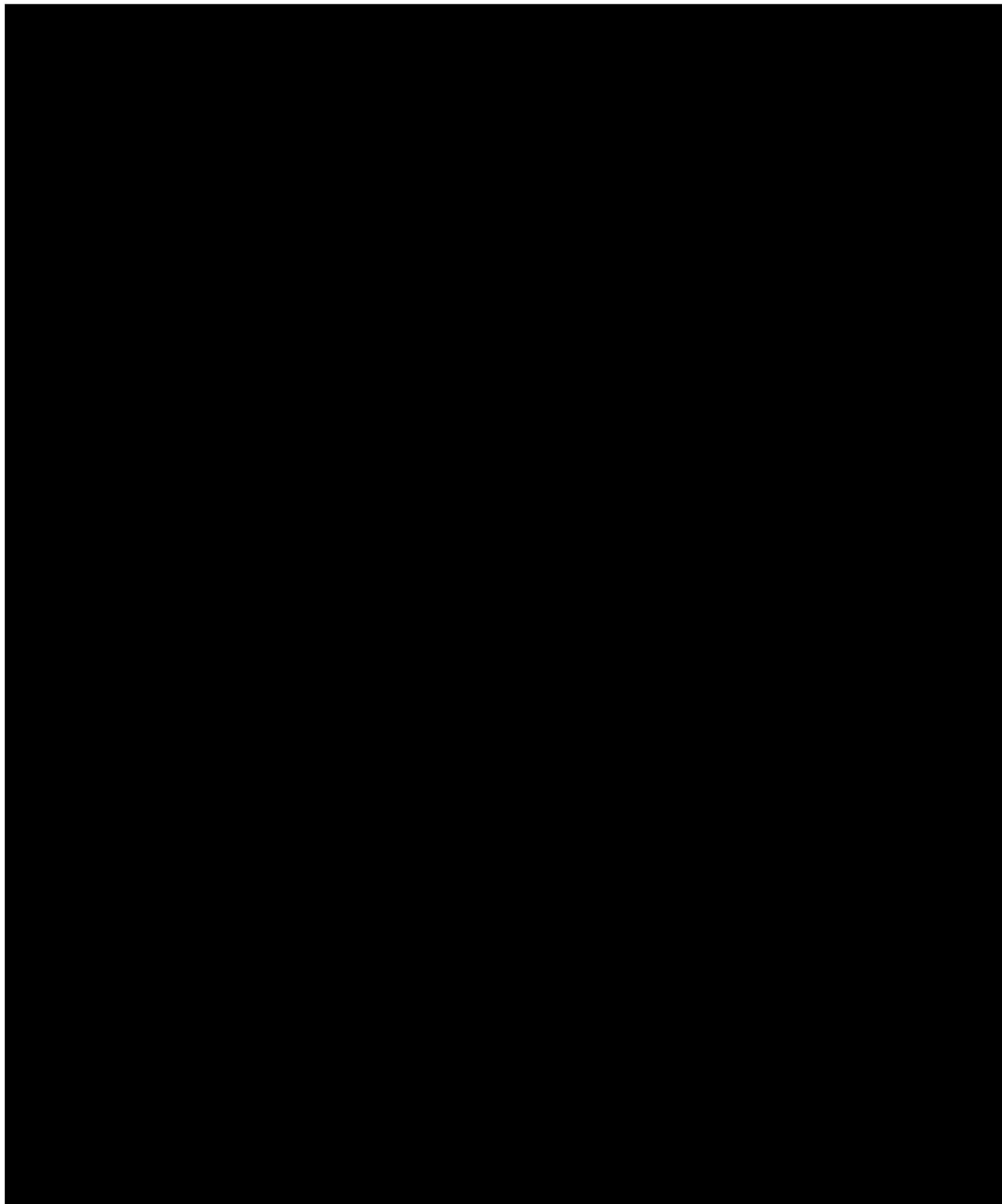


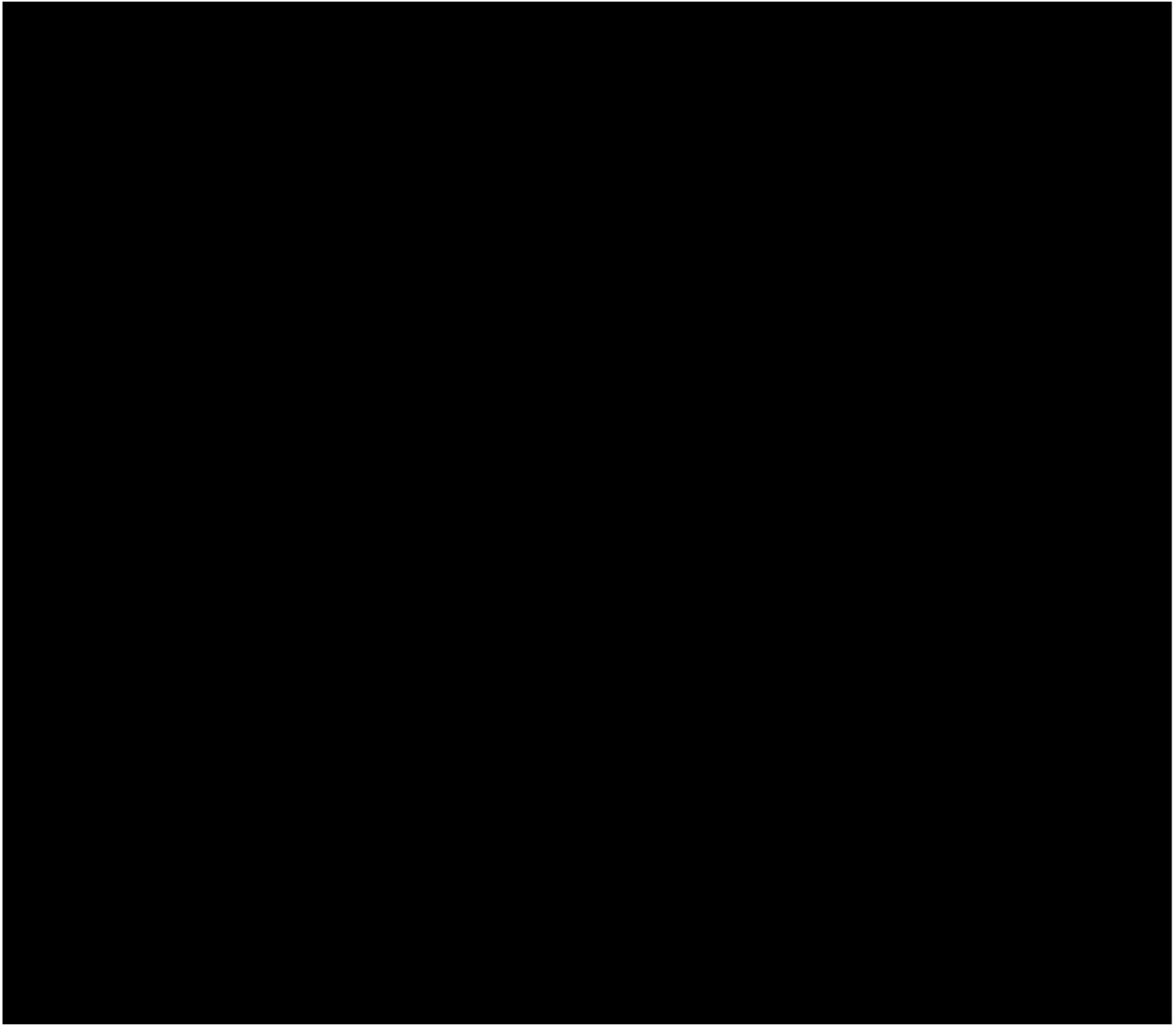




APPENDIX 1

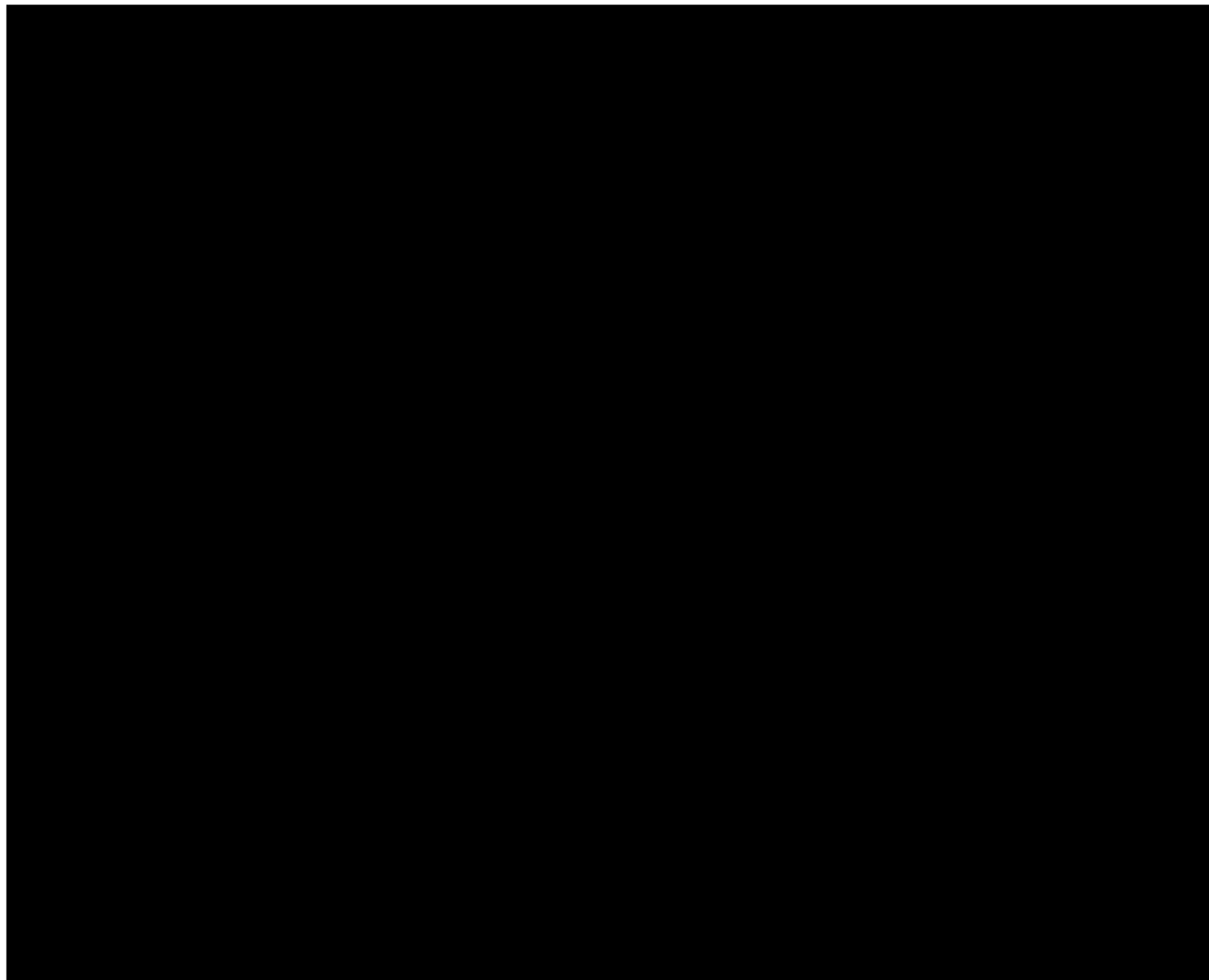
Crisis Assessment





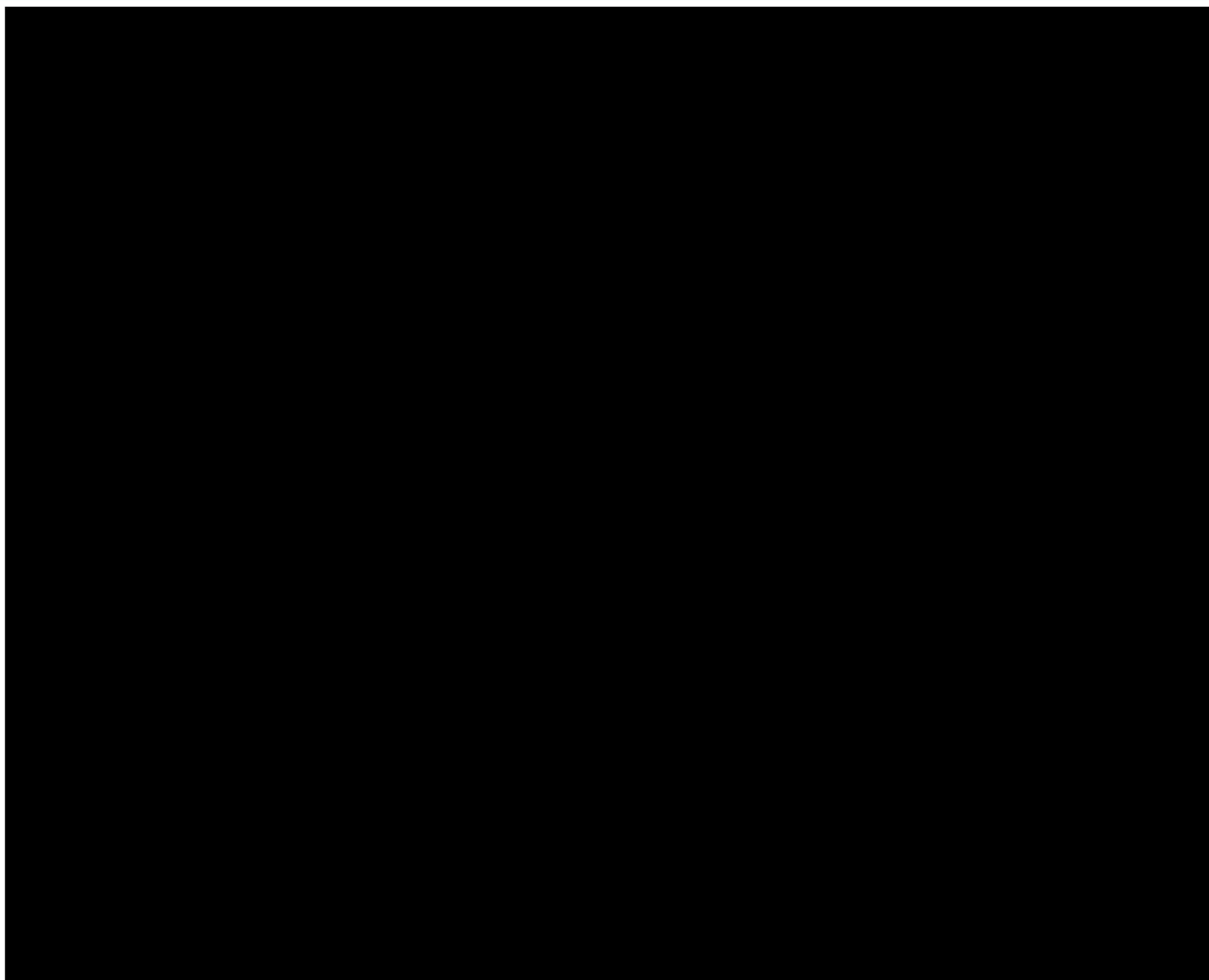
APPENDIX 2

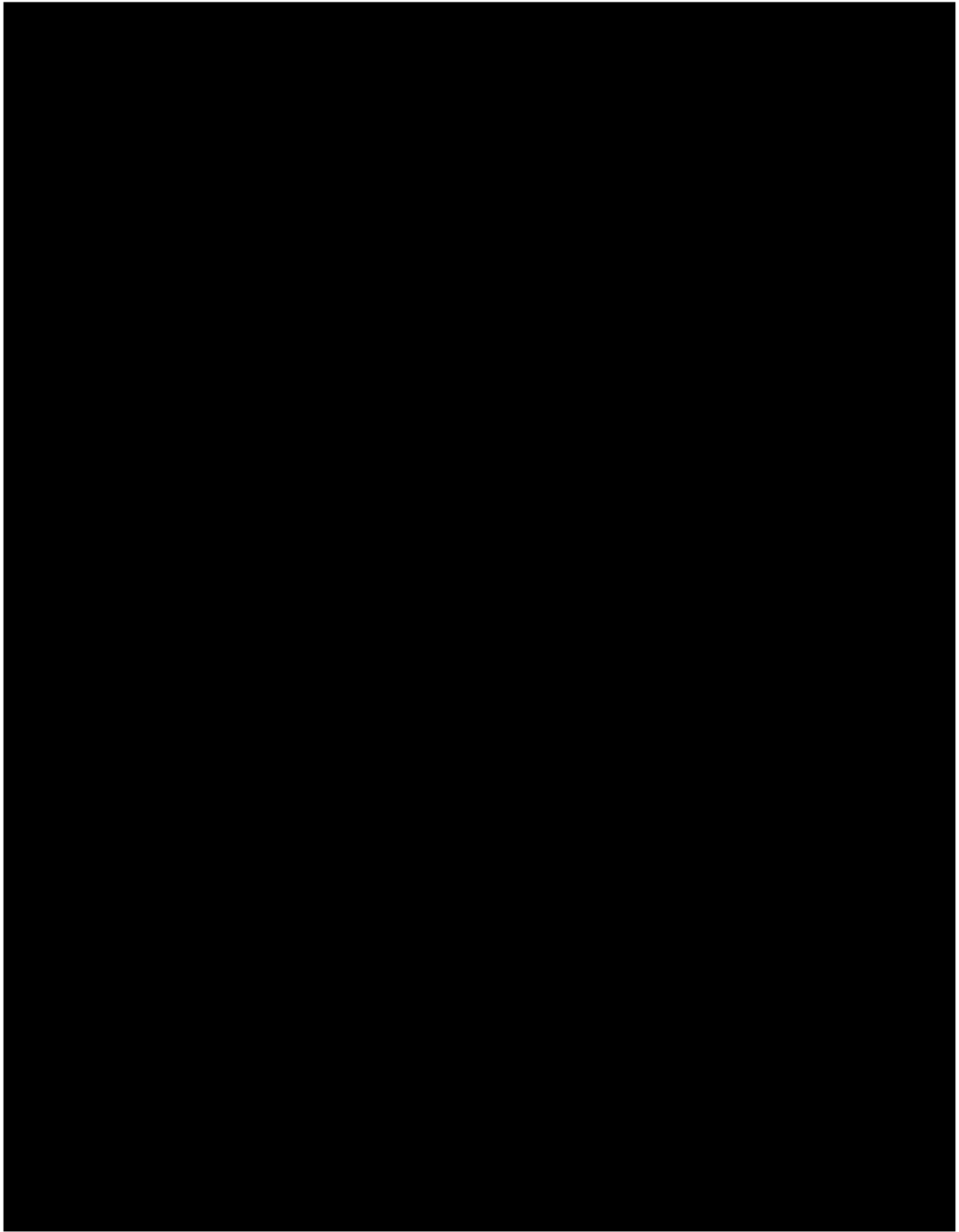
Crisis Information Form

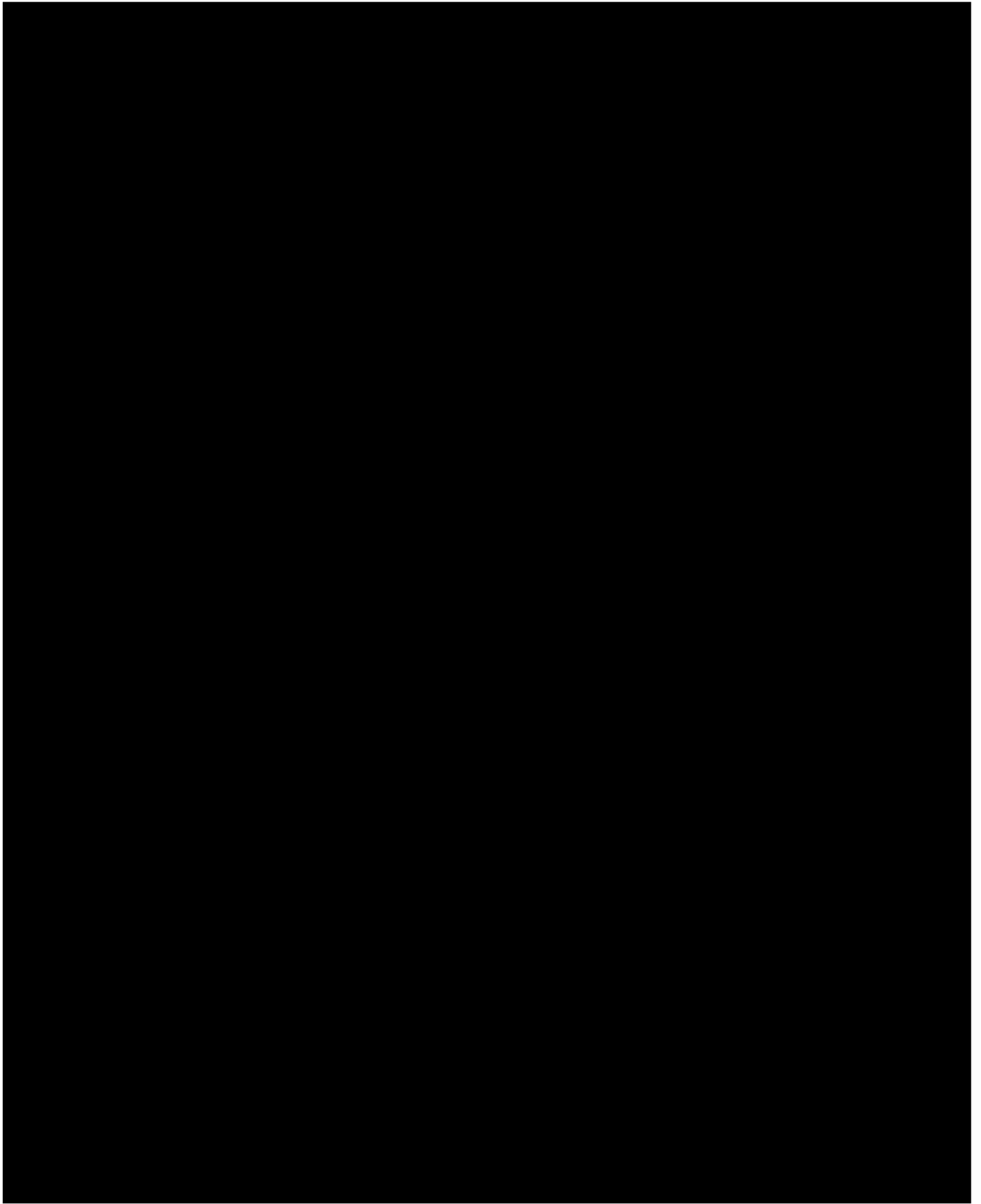


APPENDIX 3

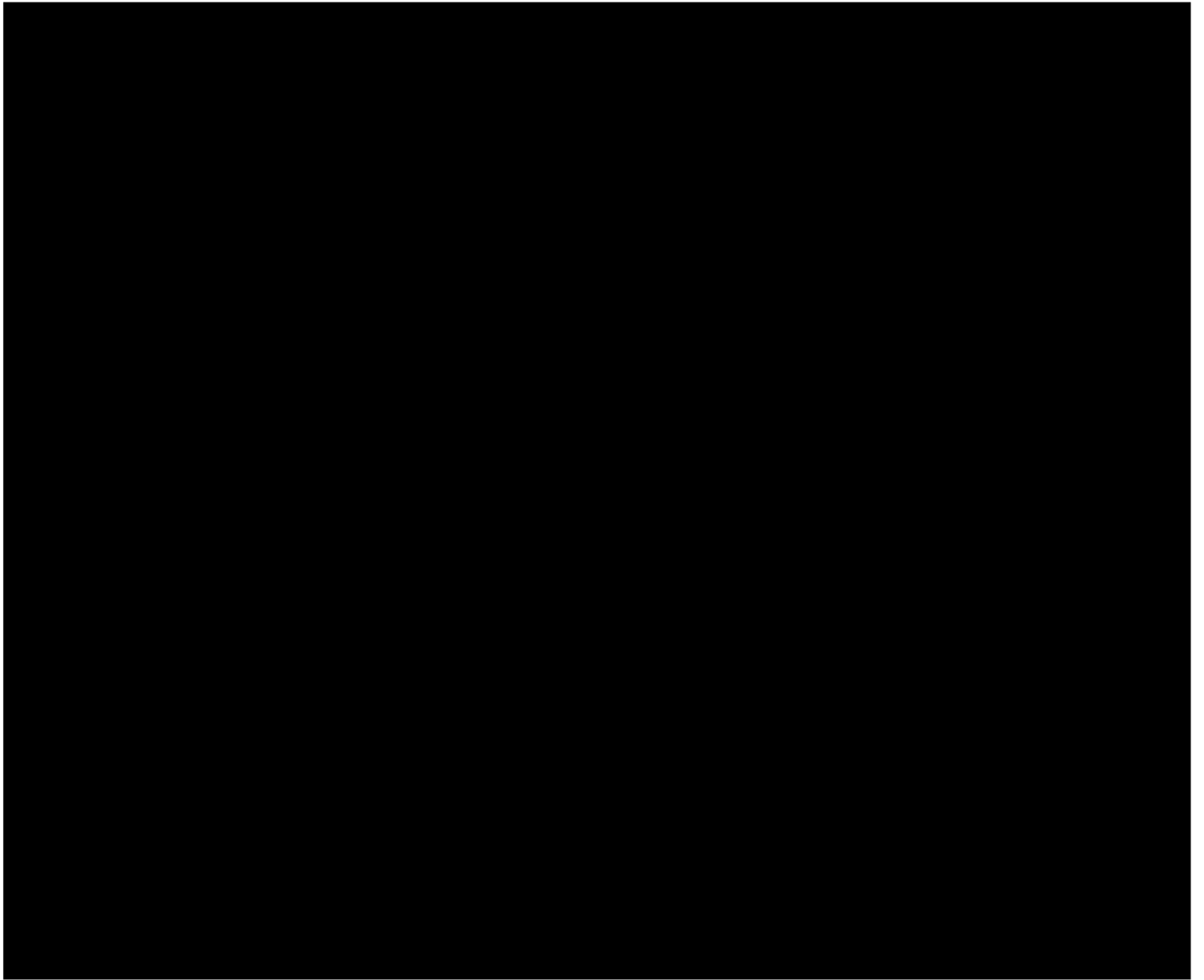
Task List by VP



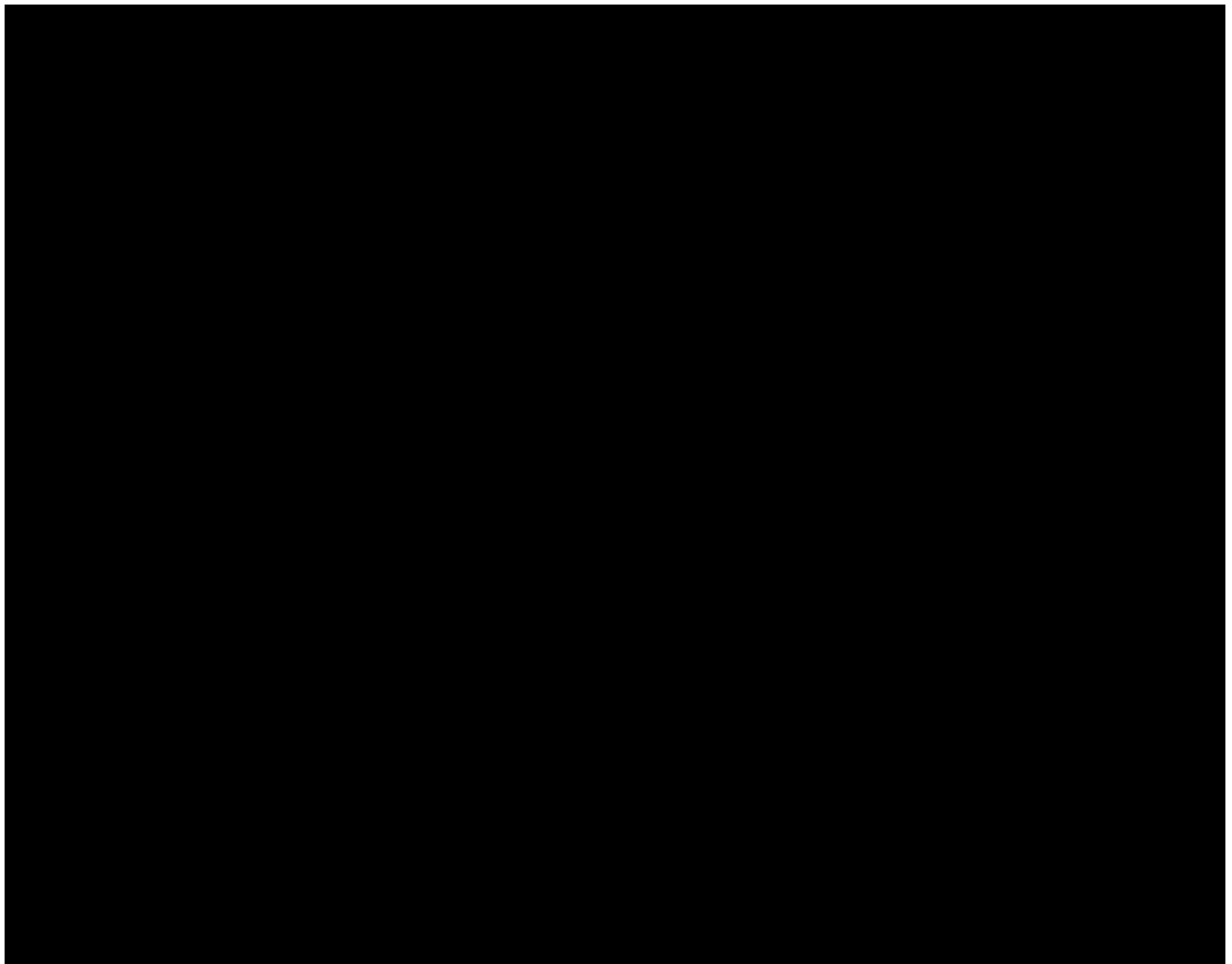


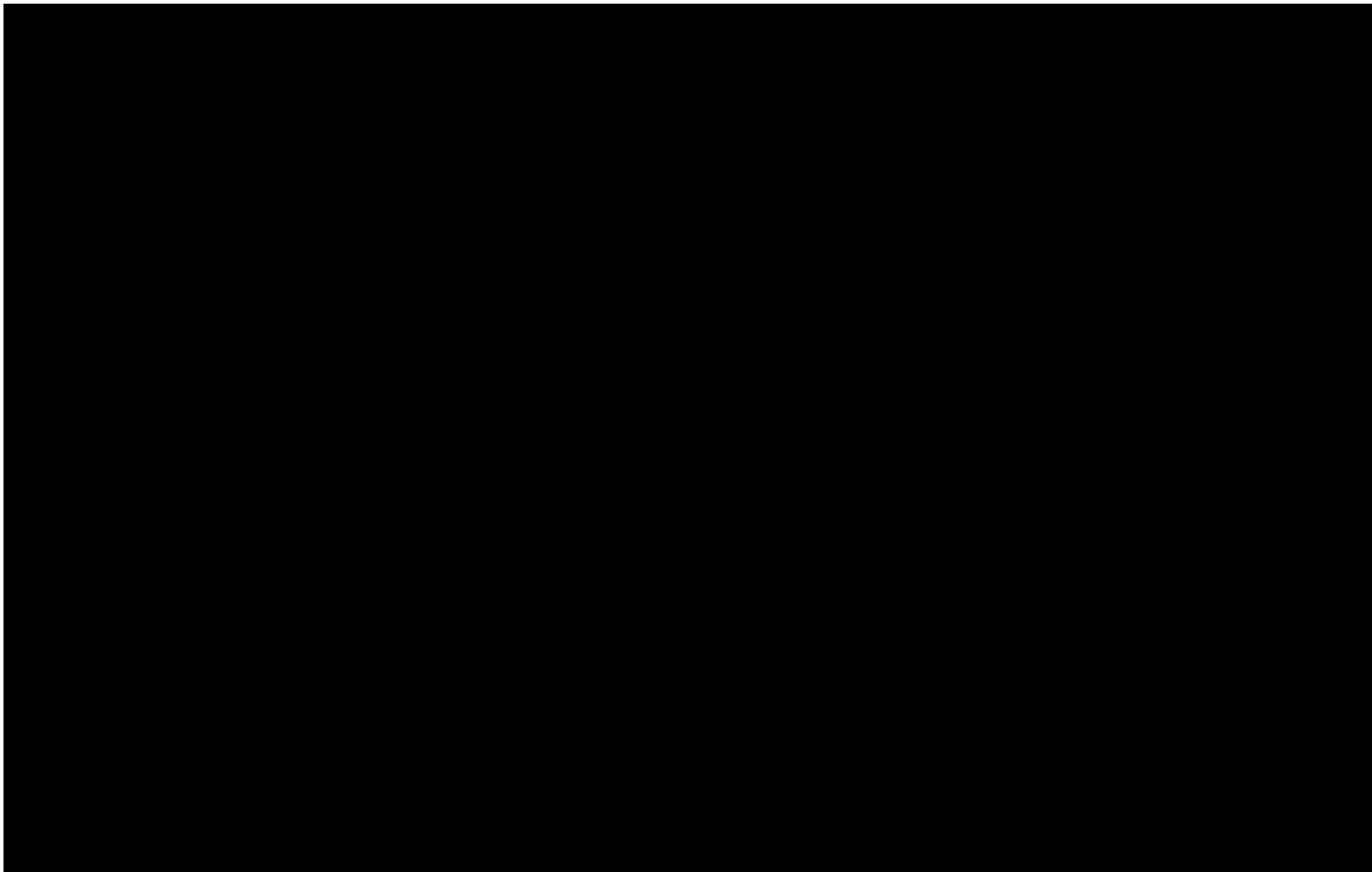


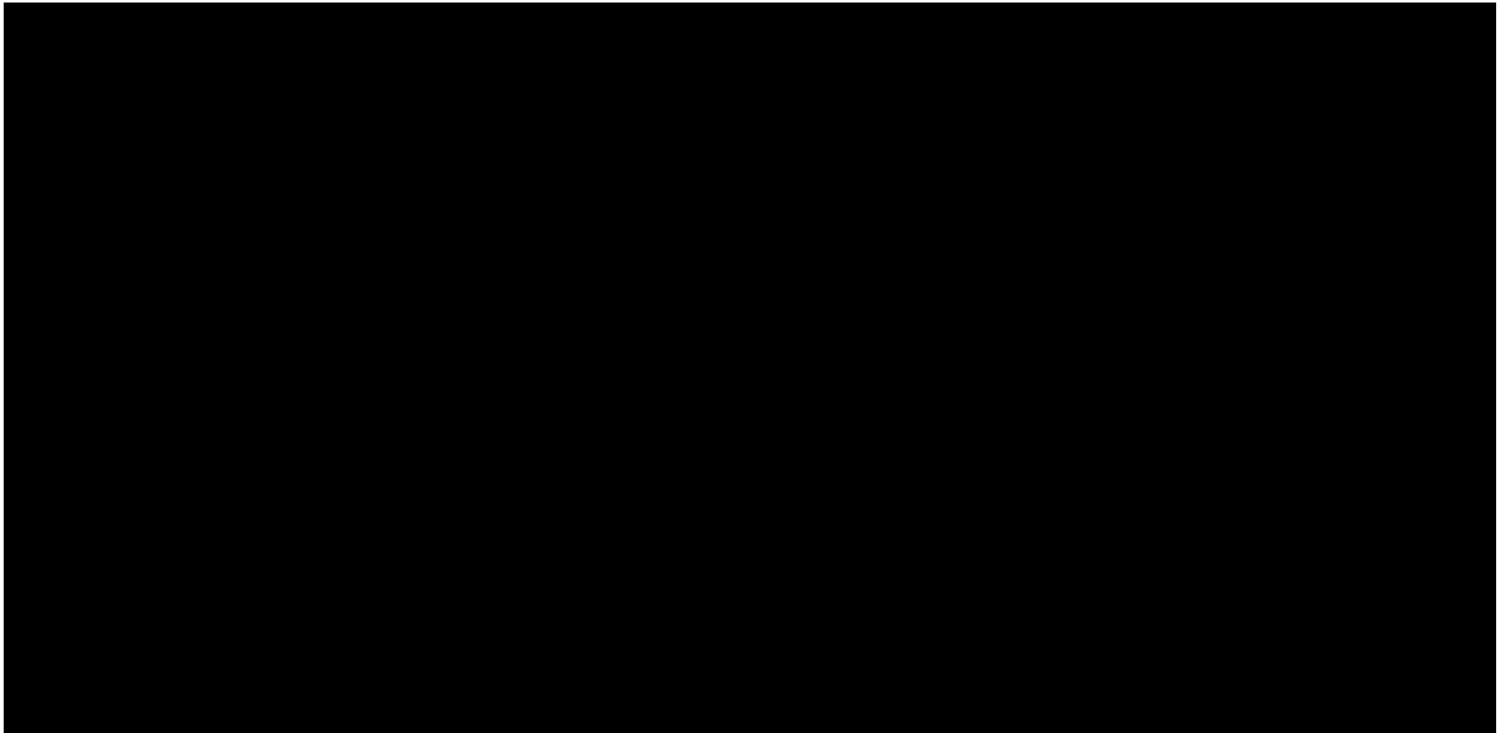


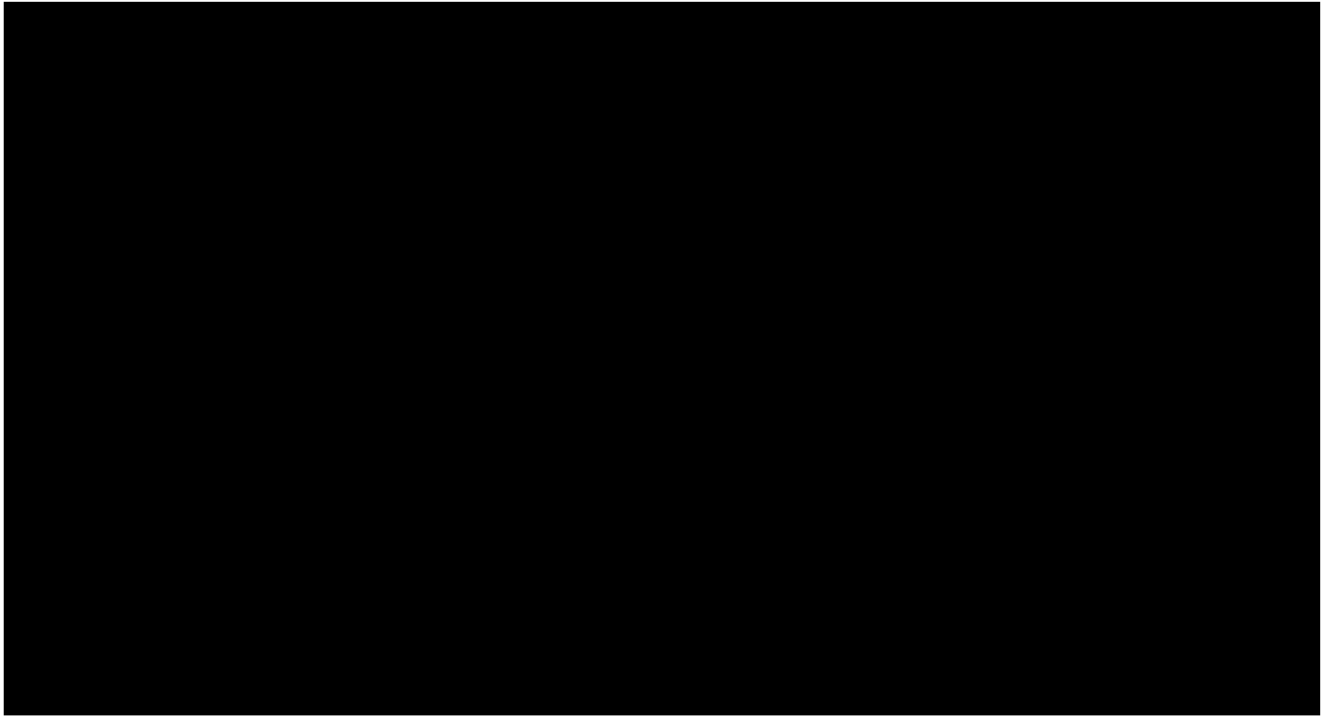


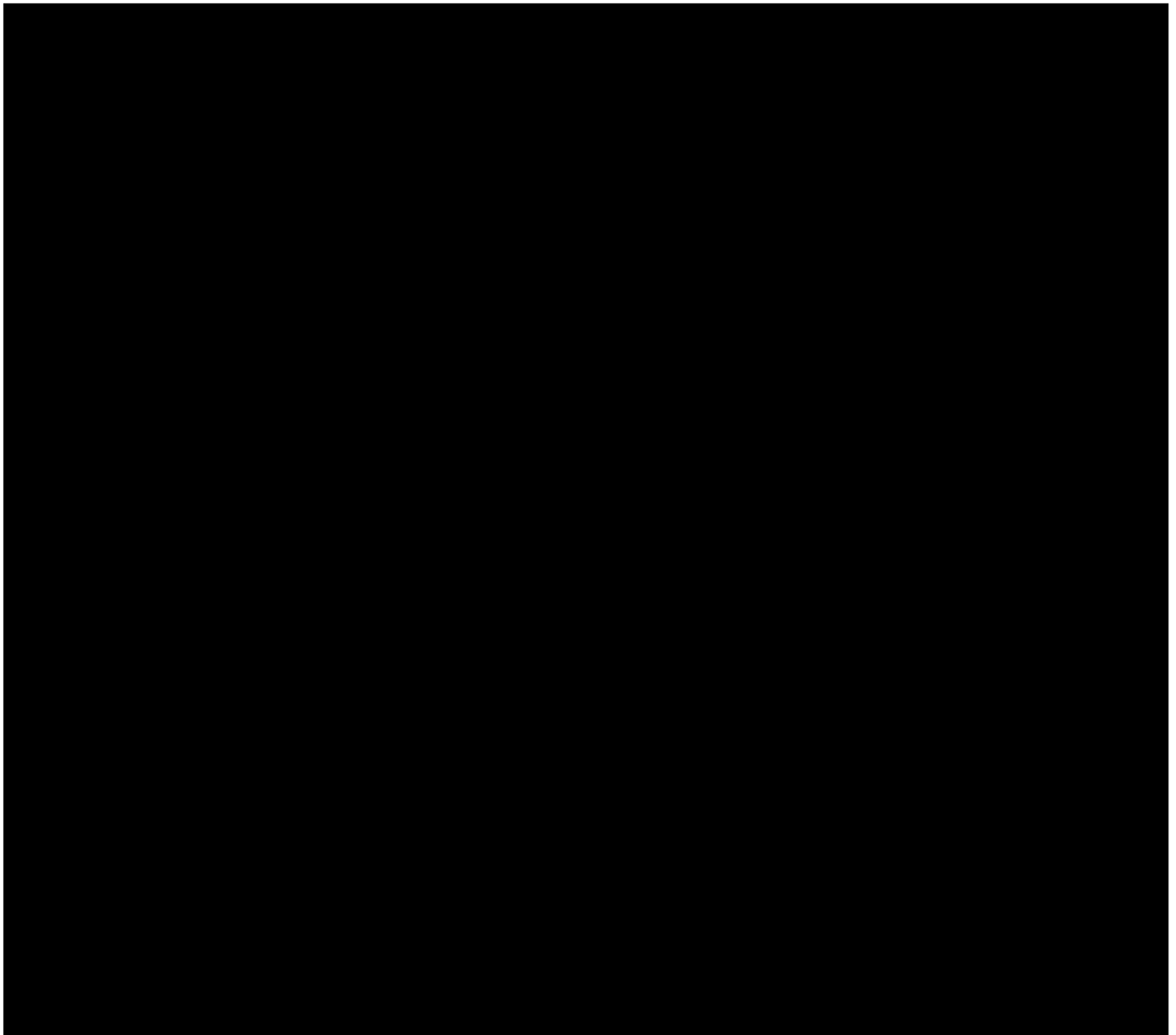






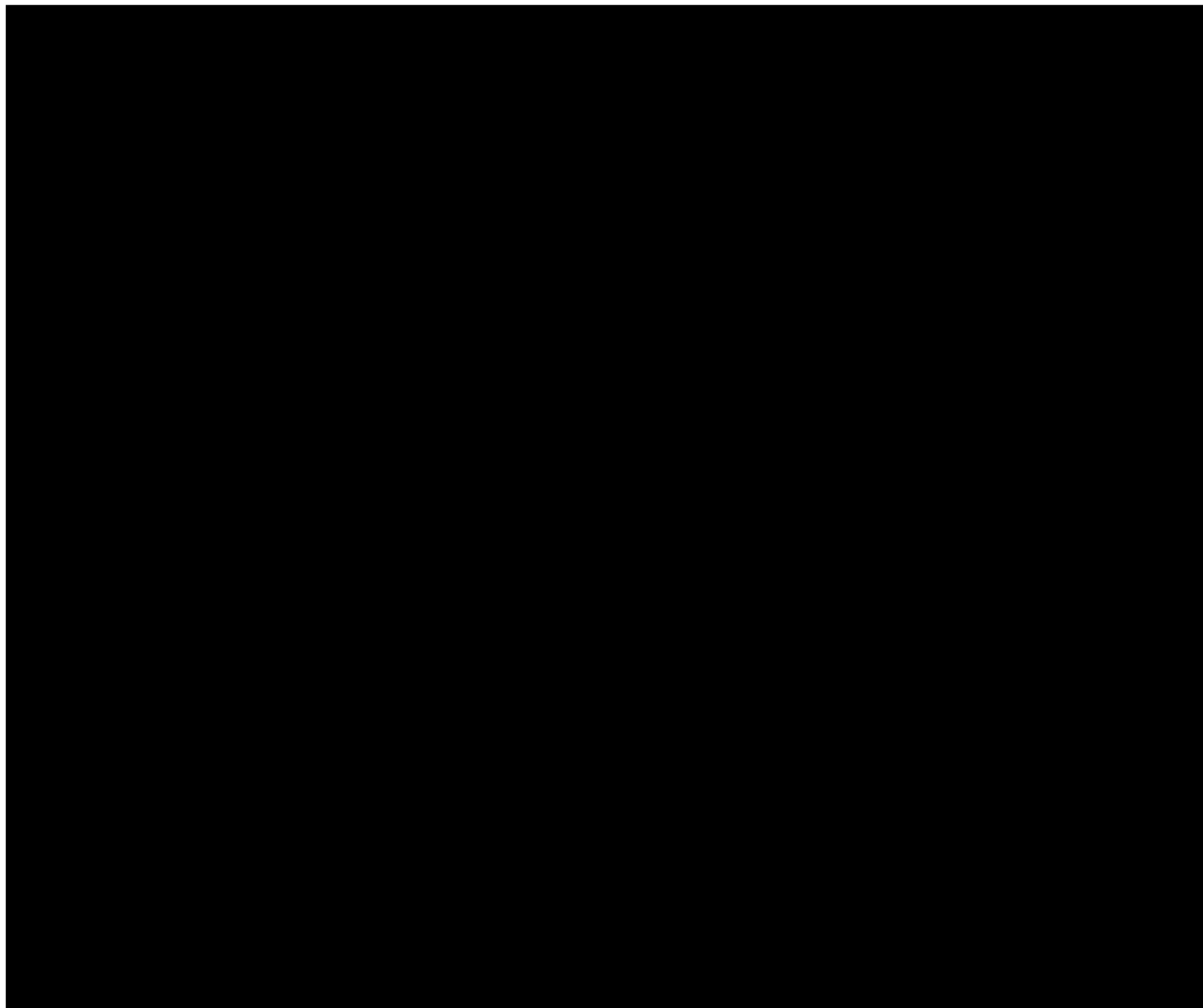






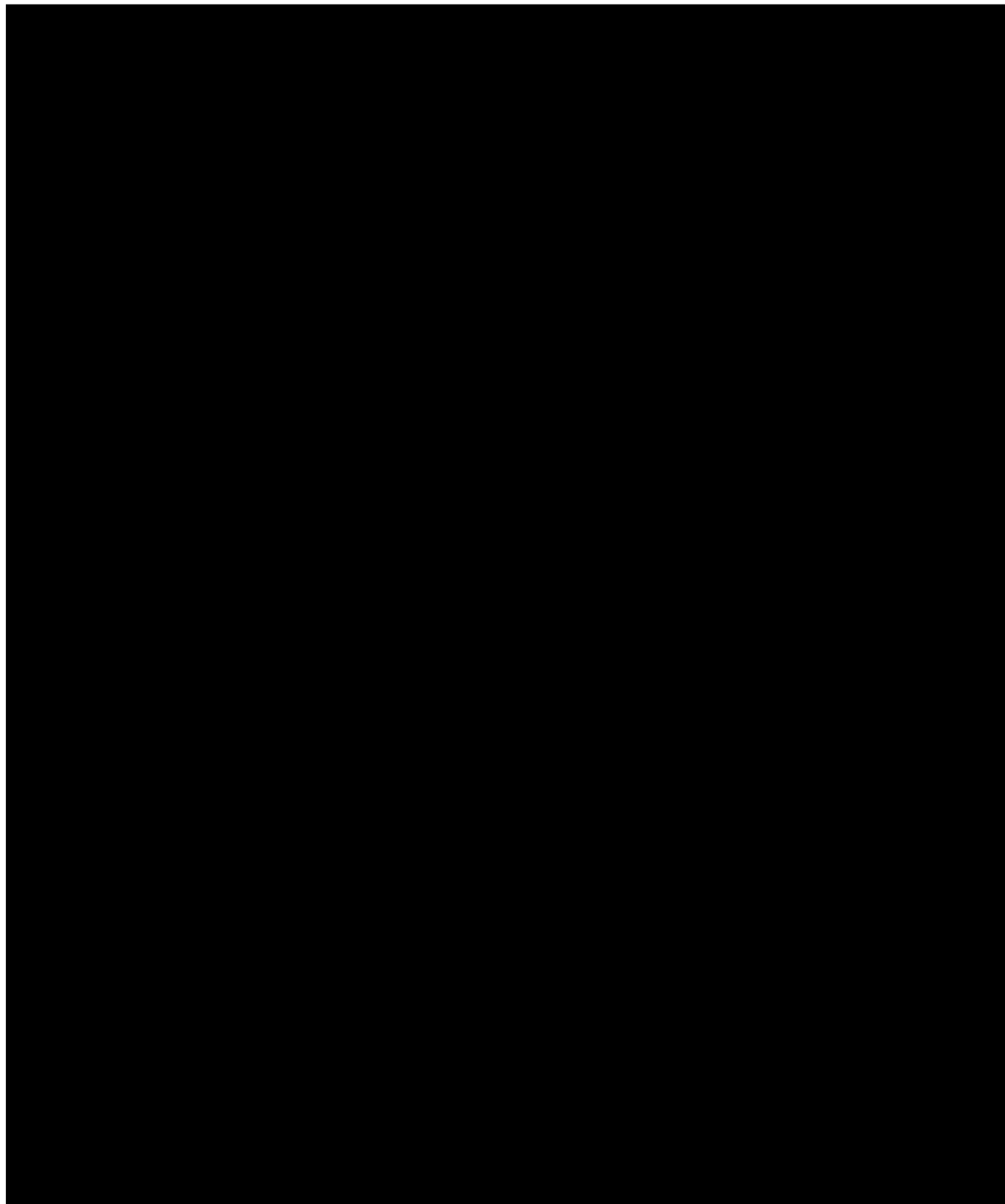
APPENDIX 4

Crisis Management Team Contact Information



APPENDIX 5

Major potential corporate emergency risks



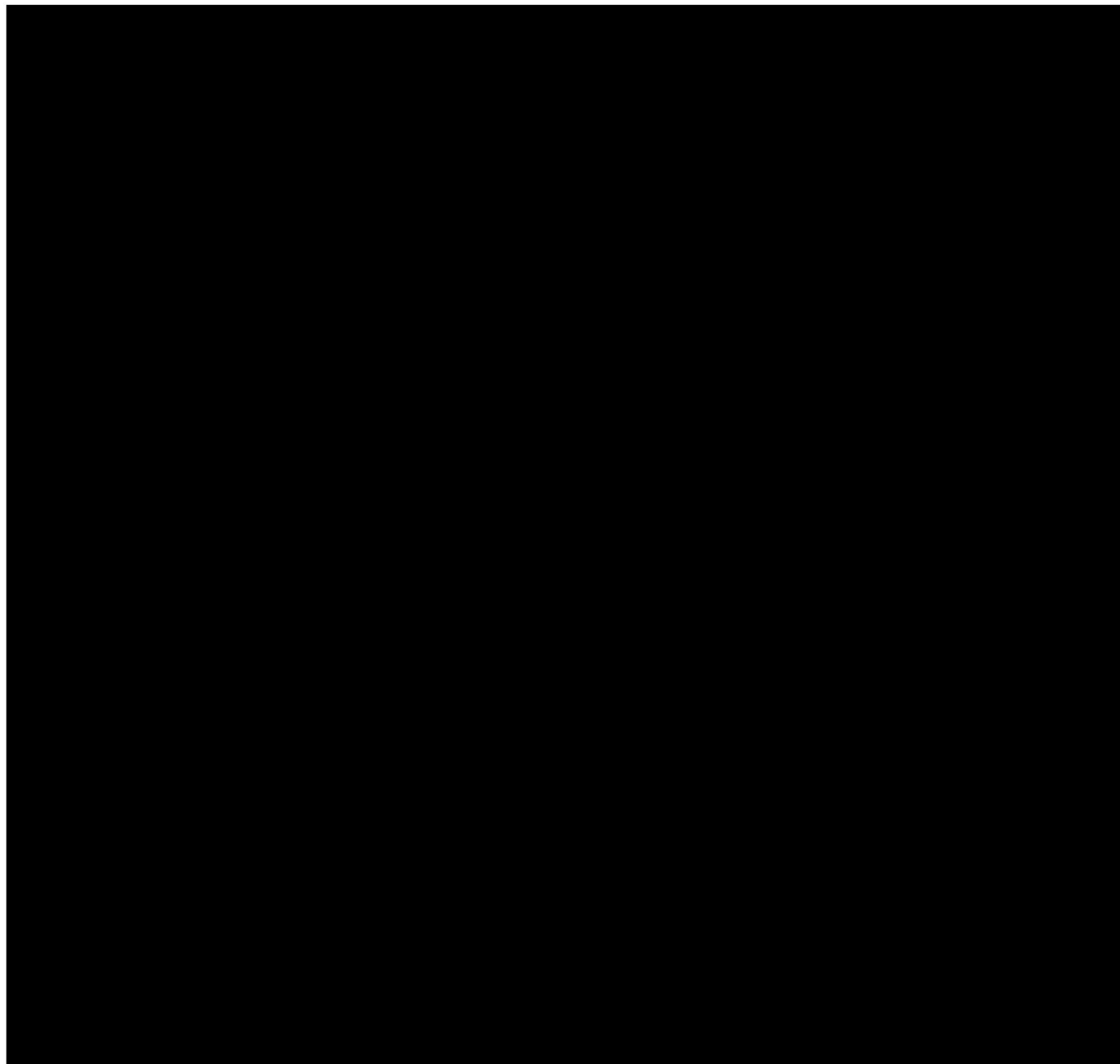
APPENDIX 6

Crisis Management Flowchart

SEE NEXT PAGE

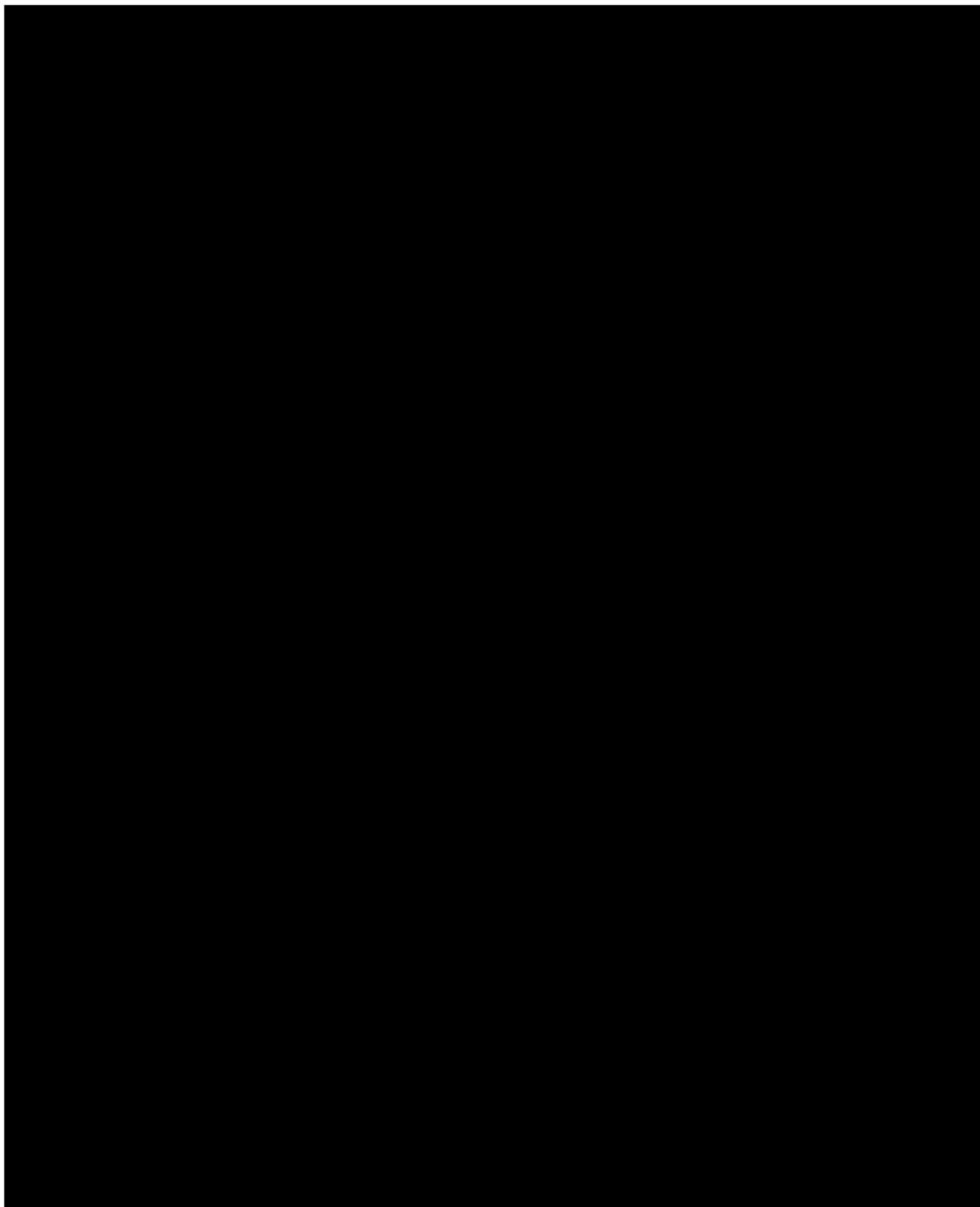
APPENDIX 7

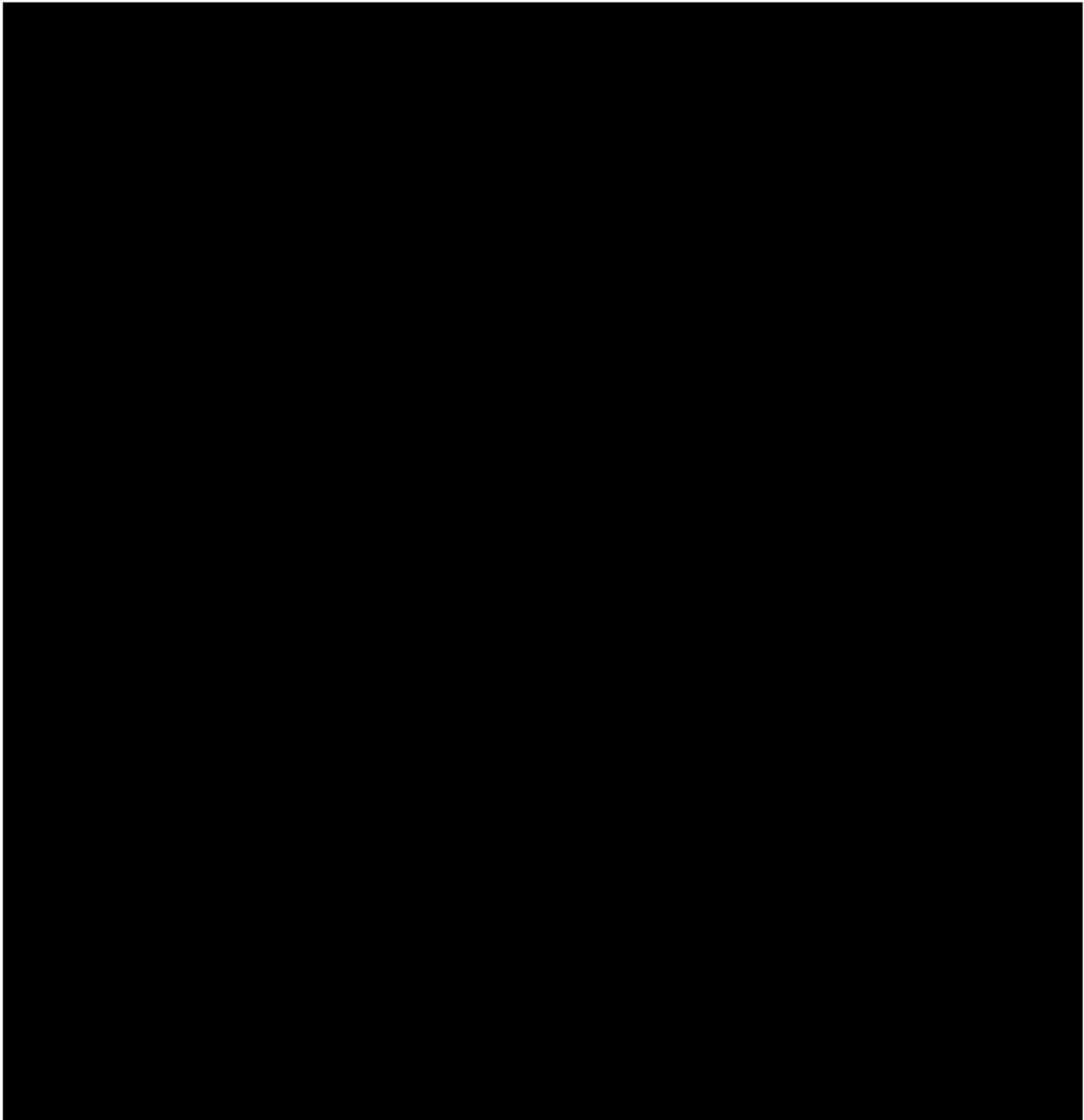
Decision Making Process in the Event of Ransomware

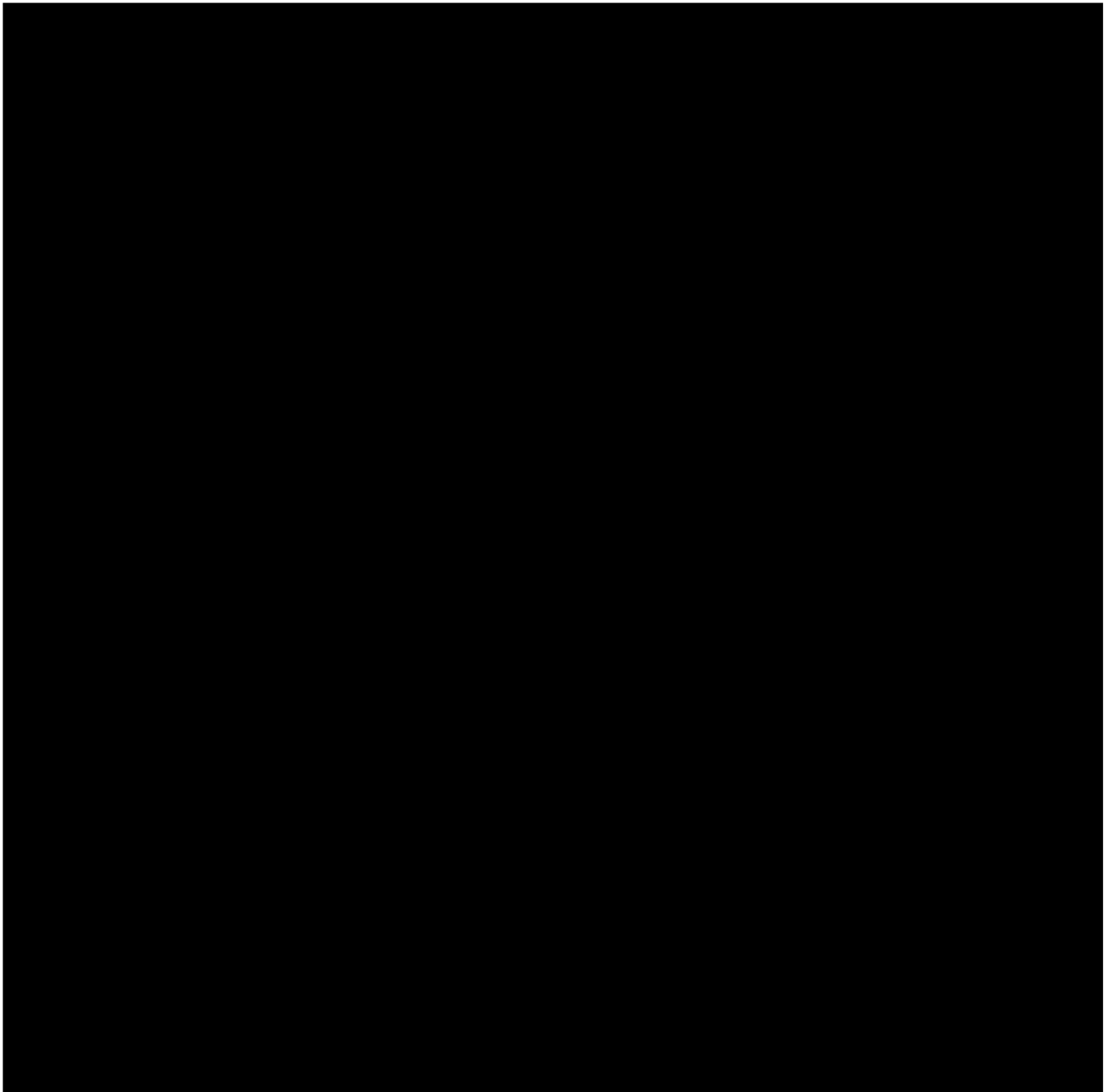


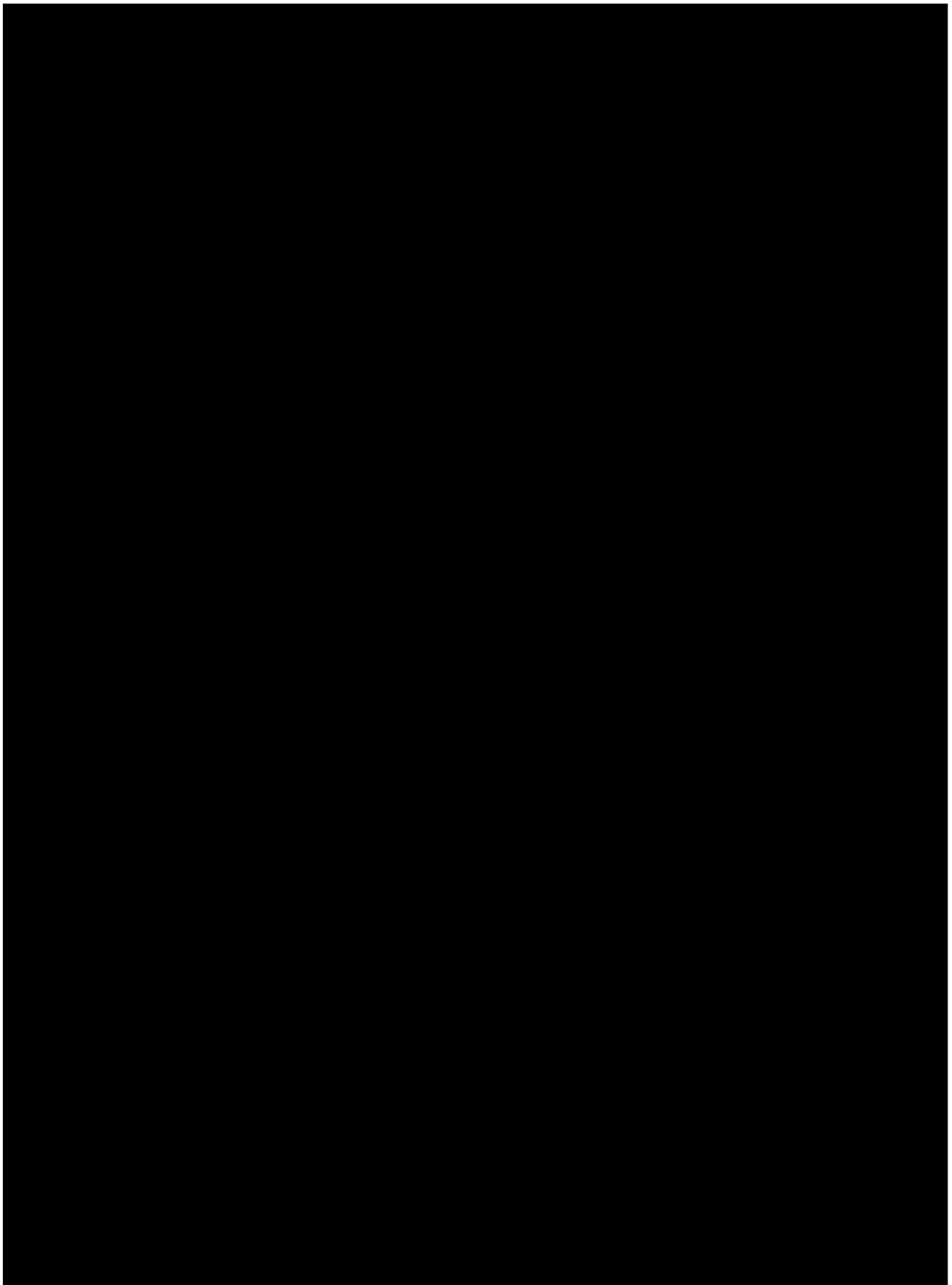
APPENDIX 8

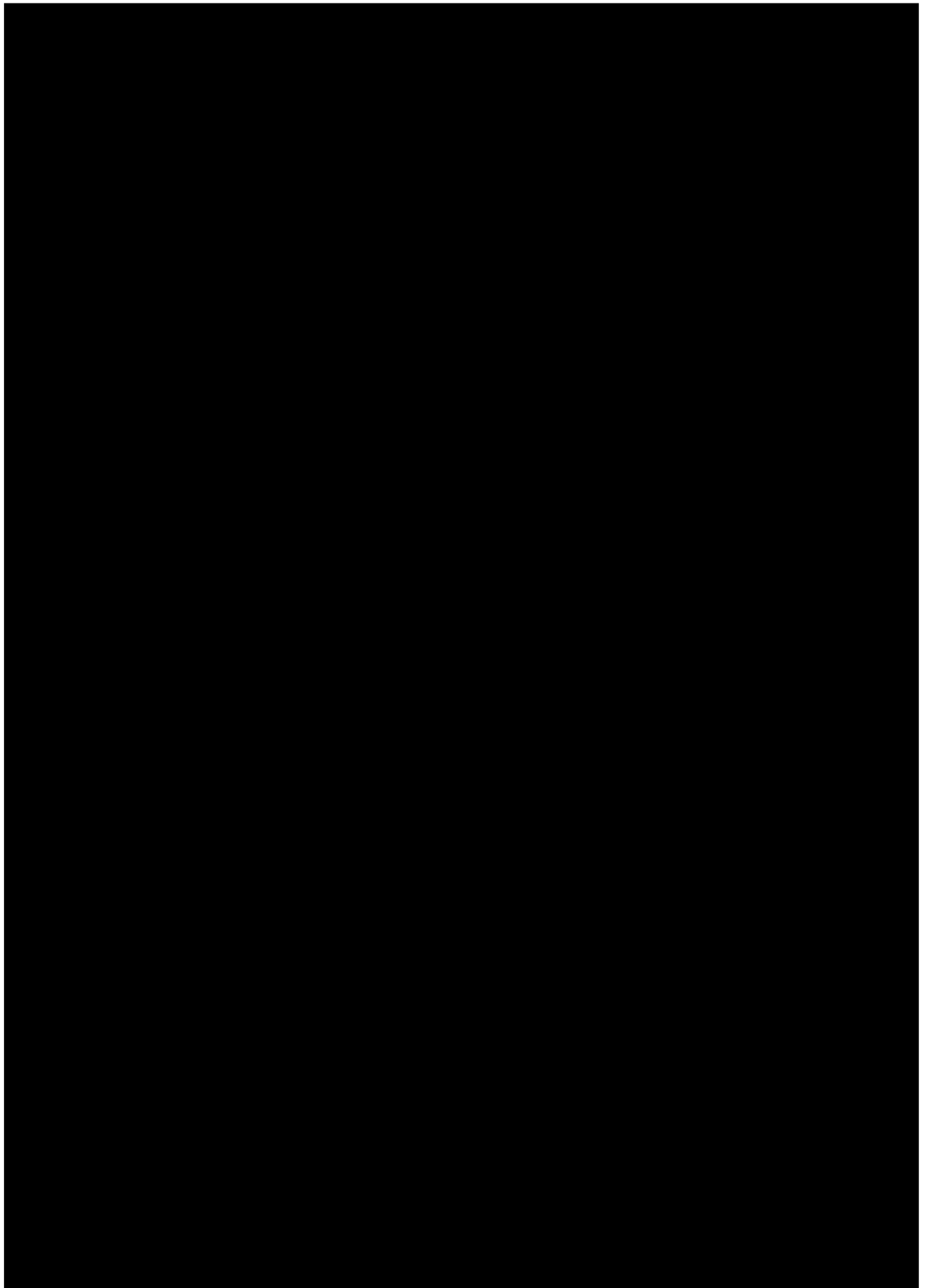
Communication Tools







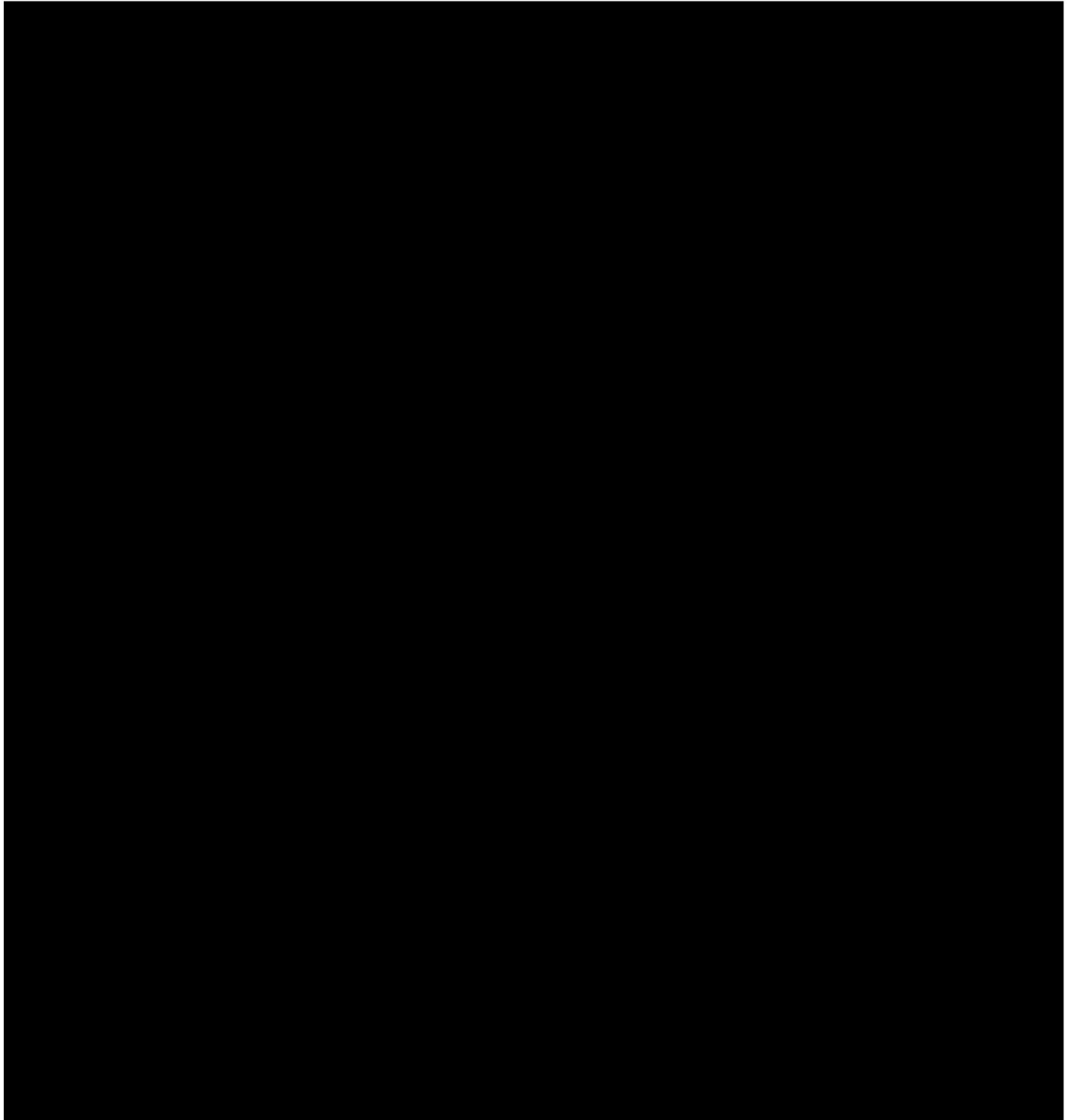






APPENDIX 9

Site-Specific Emergency Response Plan Topic List



Phoebe Energy Project, 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

Phoebe Energy Project, LLC (PEP) 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.

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

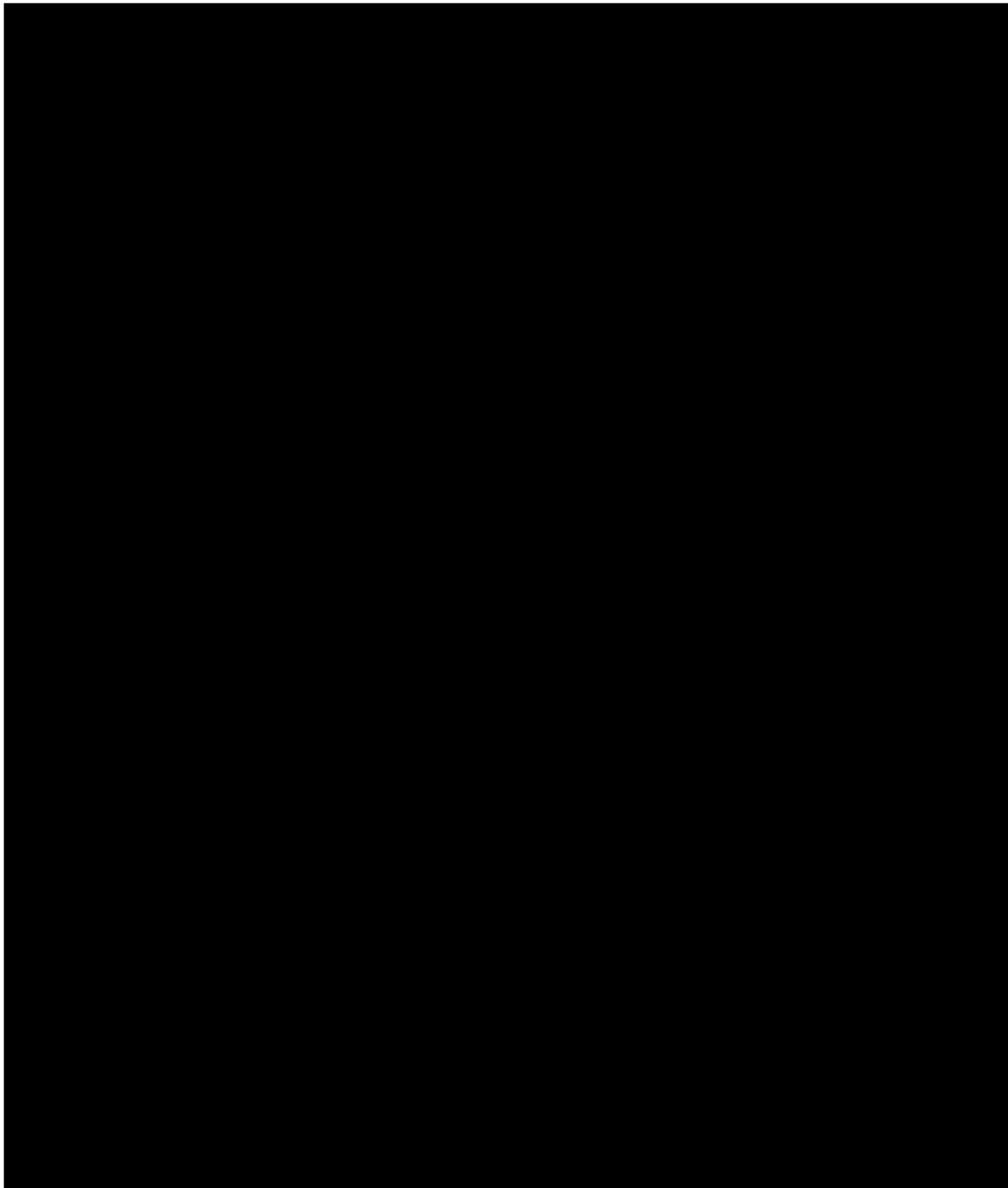
- Attachment C.1 EOP Supplies Checklist, PEP verifies the readiness of its emergency response supplies on a monthly basis, prompted by a report generated by INTERAL (Innergex maintenance management system)

Attachment C.1 – PEP EOP Supplies Checklist

INNERGEX

Site:

Phoebe



Phoebe Energy Project, LLC

Emergency Staffing Plan

§25.53 (d)(4)

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

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 (PIC)	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	6

1 Definitions

- ERCOT Electric Reliability Council of Texas
- NERC North American Electric Reliability Corporation
- NS NovaSource Power Services
- OEM Original Equipment Manufacturer
- PCS Power Conversion Station (inverter)
- PEP Phoebe Energy Project, LLC
- PIC Person-in-Charge
- PUCT Public Utilities Commission of Texas

2 Introduction

This staffing plan outlines the staffing requirements at Phoebe Energy Project, LLC (PEP), also known as Phoebe Solar, 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 PEP safely, environmentally compliant, and reliably with a high percentage 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. 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 that those staff still able to travel to and carry out a function on site remain safe to maintain the site's operational status until the Extreme Cold Weather 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 (PIC)

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

- NS Area Manager
- NS Site 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.

- NS Site Lead or PIC
- NS Site Technician

- OEM (e.g. Power Electronics) Field Service Technician

3.1.3 Non-Critical Positions that Could Be Temporarily Halted

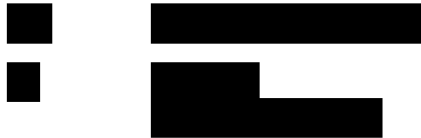
No positions can be halted; however, steps can be taken to minimize the number of persons attending site. The following positions could all focus on directing site operating activities most of the time and can, on an as-needed basis, undertake critical activities in their areas of prime responsibility.

- OEM Field Service Technicians
- 

3.2 Critical and Non-Critical Coverage



¹ The NovaSource control center has access to the facility via VPN. The NovaSource control center can making voltage adjustments to ensure the facility is able to respond to ERCOT commands.



3.2.1 Work Shifts Required to Continue Critical Activities

Operations

The NS Site Lead 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 Innergex Assistant Manager – Operations, Solar Energy/Site Lead/NS ROC/OEMs to ensure sufficient Technician coverage to maintain the PCS. PIC 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 PIC in conjunction with NS Site Lead and OEM representatives to determine if/when to incorporate an ancillary work force should available staffing numbers drop below the capacity needed to maintain reliable operations and when to switch site operation back to a normal work schedule.

NS Technicians

In an emergency event, it is expected that Technicians will work their standard hours on site, only if available and able to safely travel as the site can be controlled remotely via the NovaSource Control Center. The Technicians will focus on the corrective maintenance required to keep the facility operational.

NovaSource will make reasonable efforts to always maintain at least one Technician who resides within the County or is within reasonable driving distance from the site.

Power Electronics (inverter OEM) has committed to ensuring that they will have Technicians as close to the site as possible to reduce the amount travel needed in the case of having to dispatch during poor weather conditions.

Ancillary Work Force

Due to the unique operating characteristics and controls of a Solar 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 or NovaSource-owned operating sites if they are able to travel, any local or able to travel OEM Support Technicians, and third-party contractors with solar site experience.

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 by NovaSource. 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 also be based on physical site conditions such as access to the PCS, site office and road icing. 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.

Phoebe Energy Project, 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

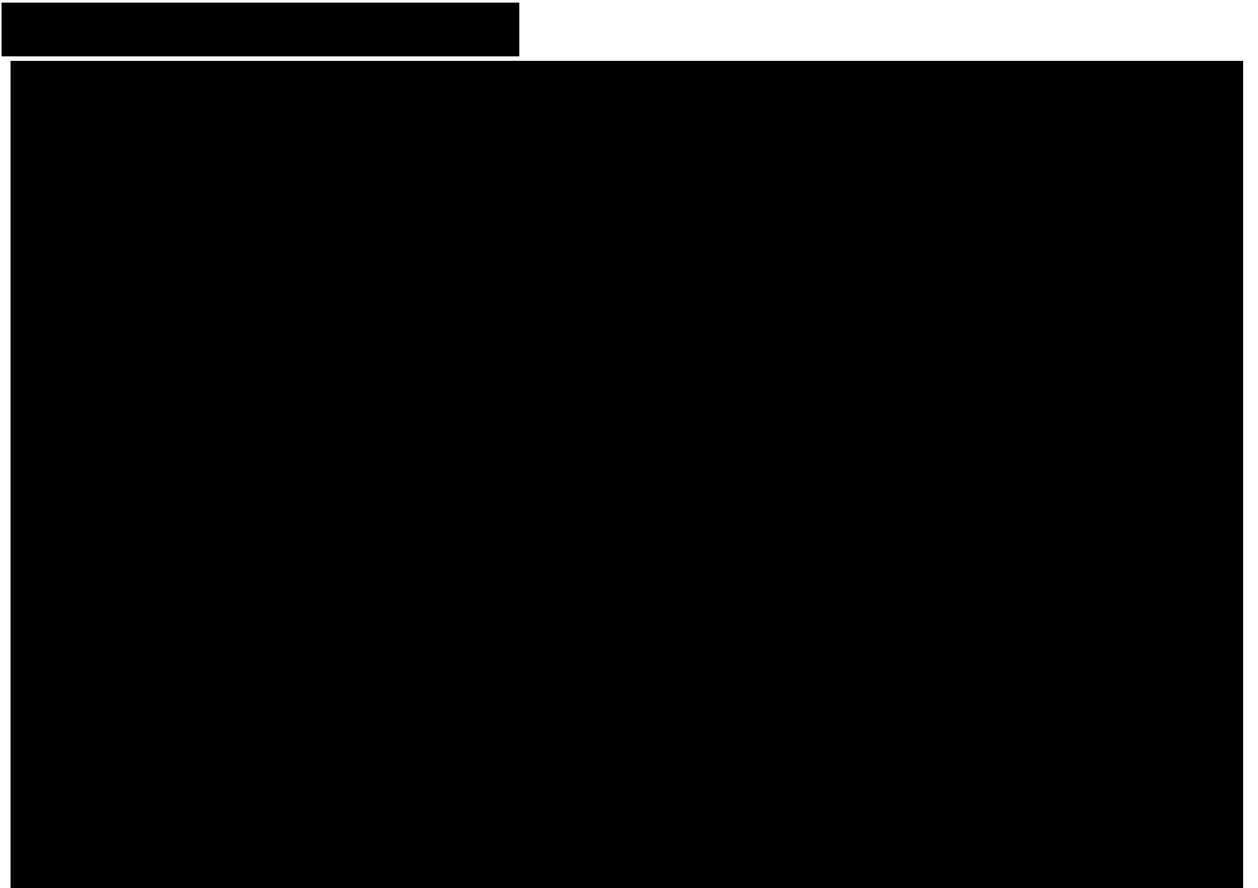
Weather related hazards can include hurricanes, tornadoes, thunderstorms, lightning, hail, high winds, drought, flooding and extreme hot and cold weather. Through forecasting models, historical weather event patterns and weather alert services it is possible to identify and prepare for weather related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

Texas Division of Emergency Management (TDEM)

Phoebe Solar (PEP) 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)

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





2. Operational Plans for Responding and Emergency Weather Event

Response to a Tornado Warning

The PEP facility does not have an on-premises tornado shelter. Should a tornado alert be issued, and it is not safe for the operations team to vacate the facility, the team must remain on the site. In this instance all personnel shall shelter in place in the substation control building, this is the only concrete structure on site design to sustain high winds.

Response to Flooding

The PEP facility is equipped with automatic flood stow capabilities for the solar modules.

On receipt of a flood signal the PEP control system will position the site trackers at a horizontal flat angle. If PEP personnel observe flooding the NovaSource Control Center can manually position the modules in flood stow. All actions by the NSCR will be recorded in the Operator Logs.

Response to Cold Weather Emergency Event

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

- Carry out an immediate check of cold weather preparedness using the PEP Cold Weather Preparation Checklist (Image 1), PEP Supplemental Winter Preparation Checklist (Image 2) and PEP OEM Asset Readiness Checklist (Image 3) (as per Standard Operating Procedure PEP320 Cold Weather Preparation and Operations), unless the Checklists were carried out within 30 calendar days of the weather advisory being received.

Image 1: PEP Cold Weather Preparation Checklist

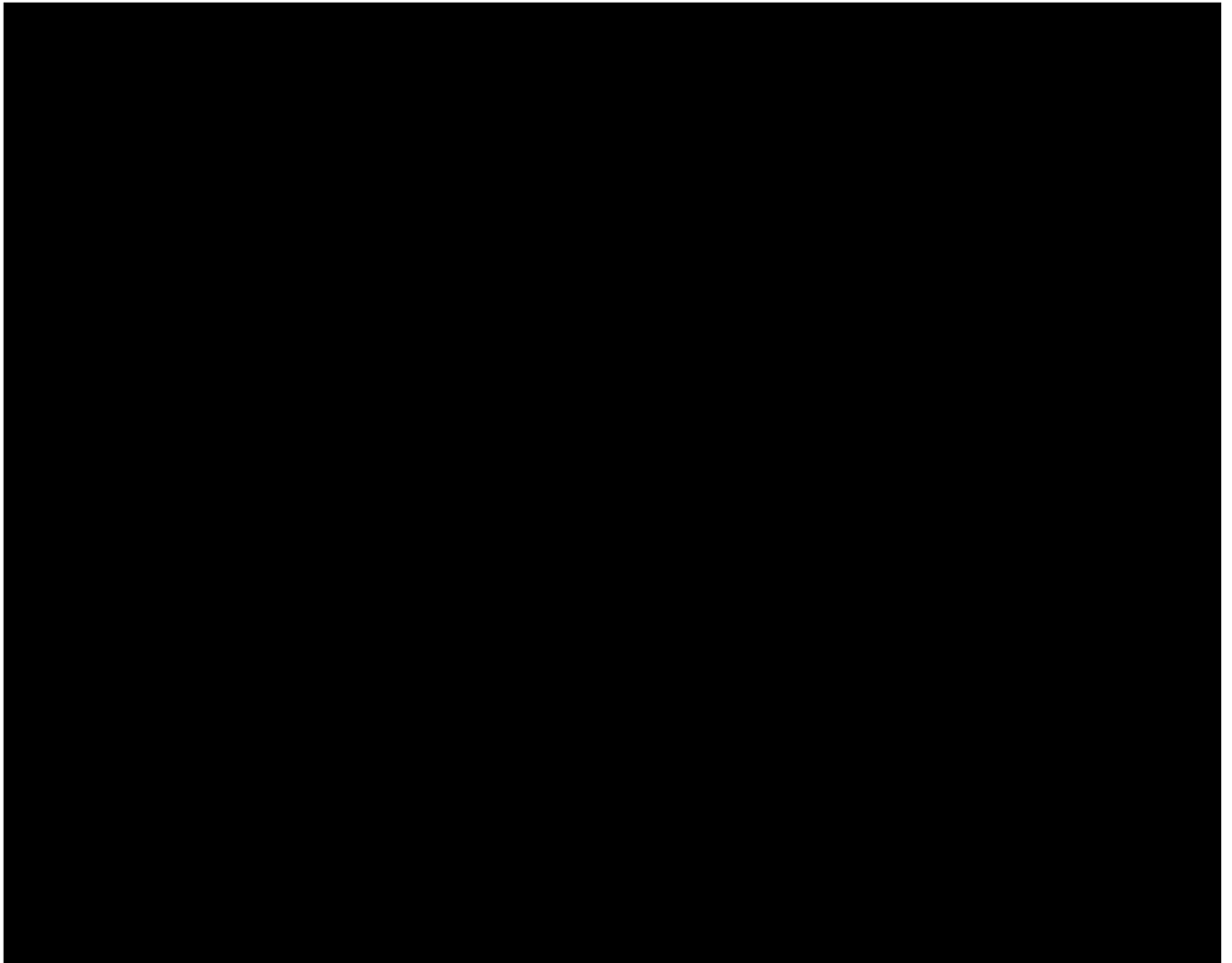


Image 2: PEP Supplemental Winter Preparation Checklist

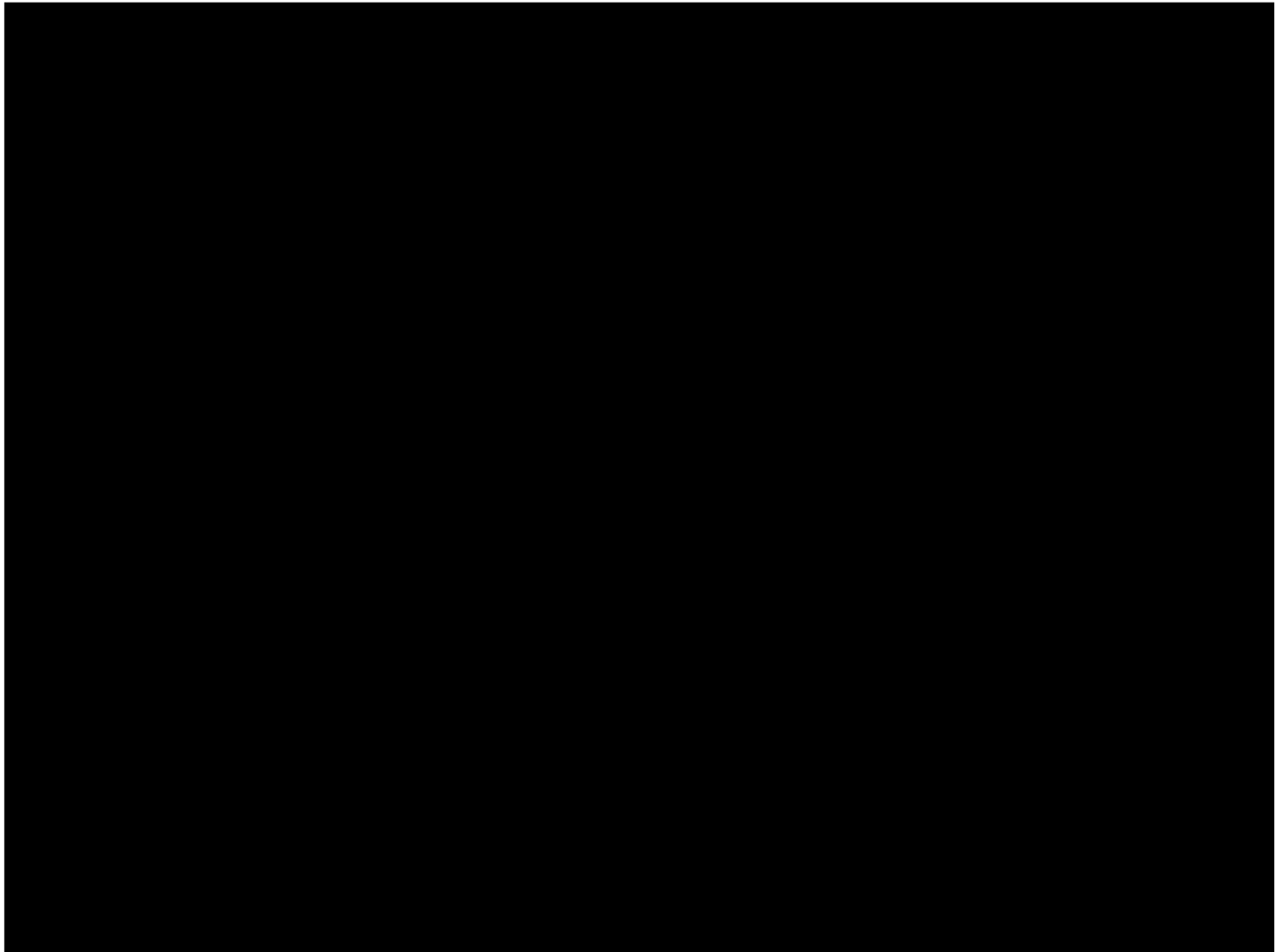
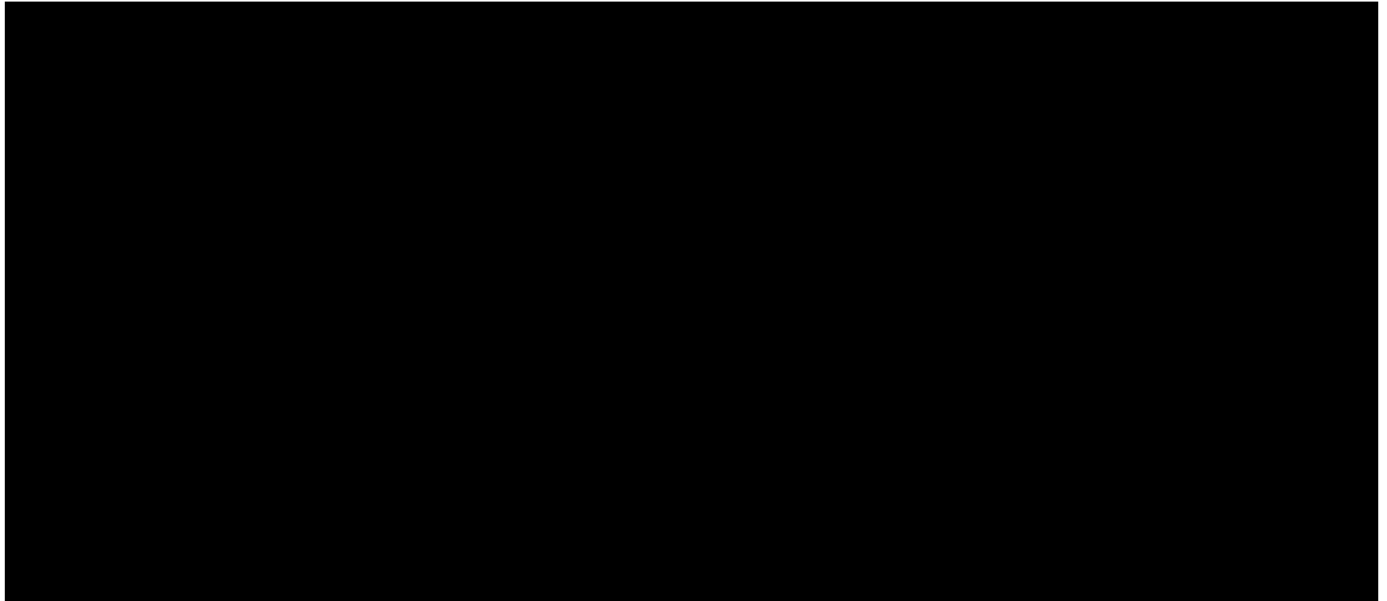


Image 3: PEP OEM Asset Readiness Checklist



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 module inspections, monitoring for signs of ice build-up.
- Monitoring of road conditions.

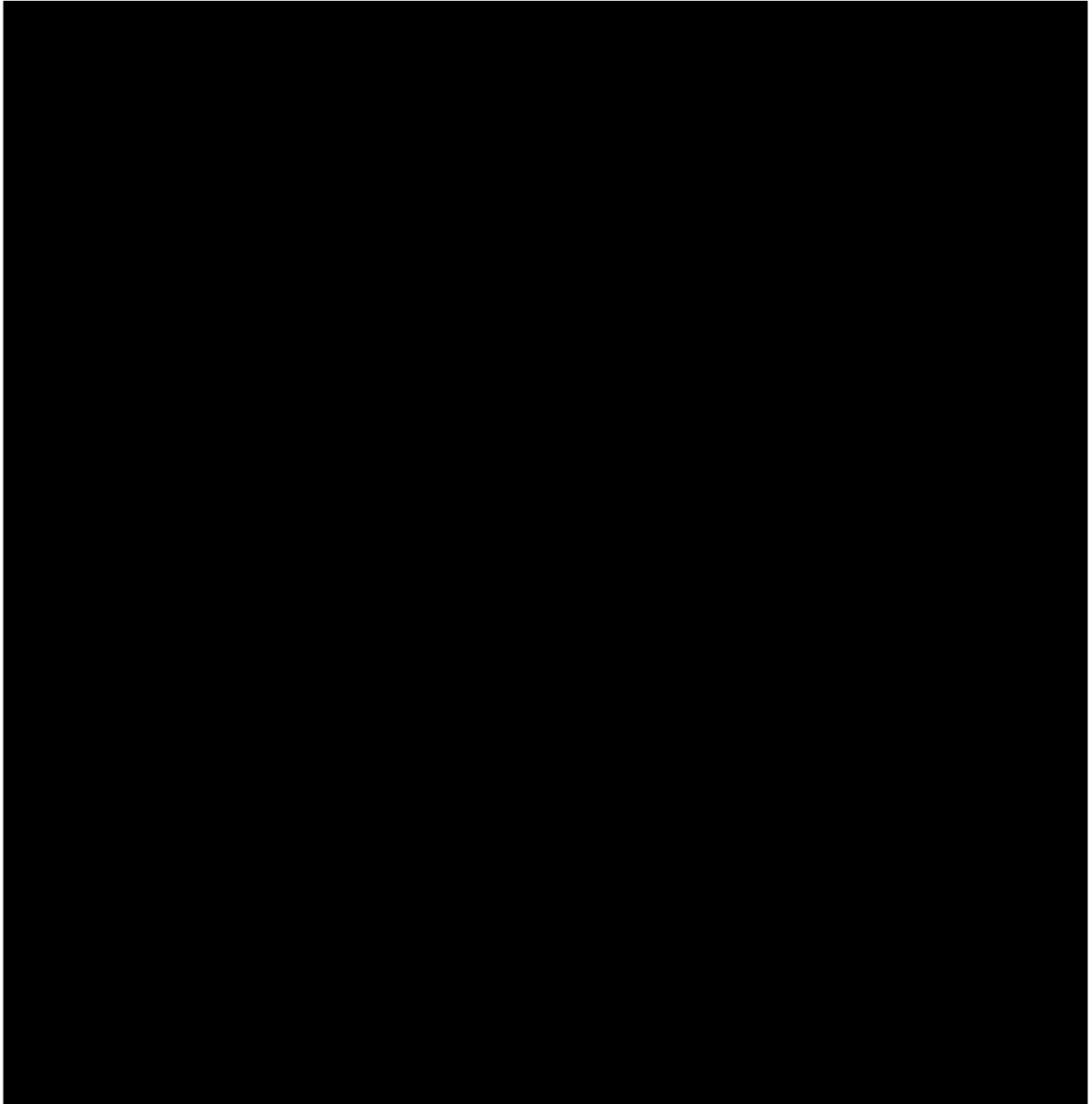
Response to a Hot Weather Emergency Event

Summers in the areas around PEP 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 (Shell) 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, PEP shall invoke the following process:

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

Image 1: PEP Hot Weather Preparation Checklist



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.
- To the extent that is possible and as needed, onsite operations shall take necessary measures to ensure proper ventilation for cooling balance of plant equipment. This may include the setup of fans to move air around specific plant equipment for which overheating may be an issue.

- Basic firefighting equipment (shovel, Pulaski and fire pump can) will be relocated from the O&M Storage Facility to the site vehicles on site (to allow for rapid deployment) and checked as part of the hot weather preparation checklist.

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 PEP.

Phoebe Energy Project, 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 Phoebe Energy Project, LLC (PEP), also known as Phoebe Solar, 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.

Phoebe Energy Project, 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 Phoebe Energy Project, LLC (PEP) generation facility fail to start or trip offline due to a hazard or threat, PEP will use its Switching Order PEP-SUB-EOP Restoration Re-Energization Procedure (see Attachment G.1) to restore service on site.

[REDACTED]

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

2 Business Continuity

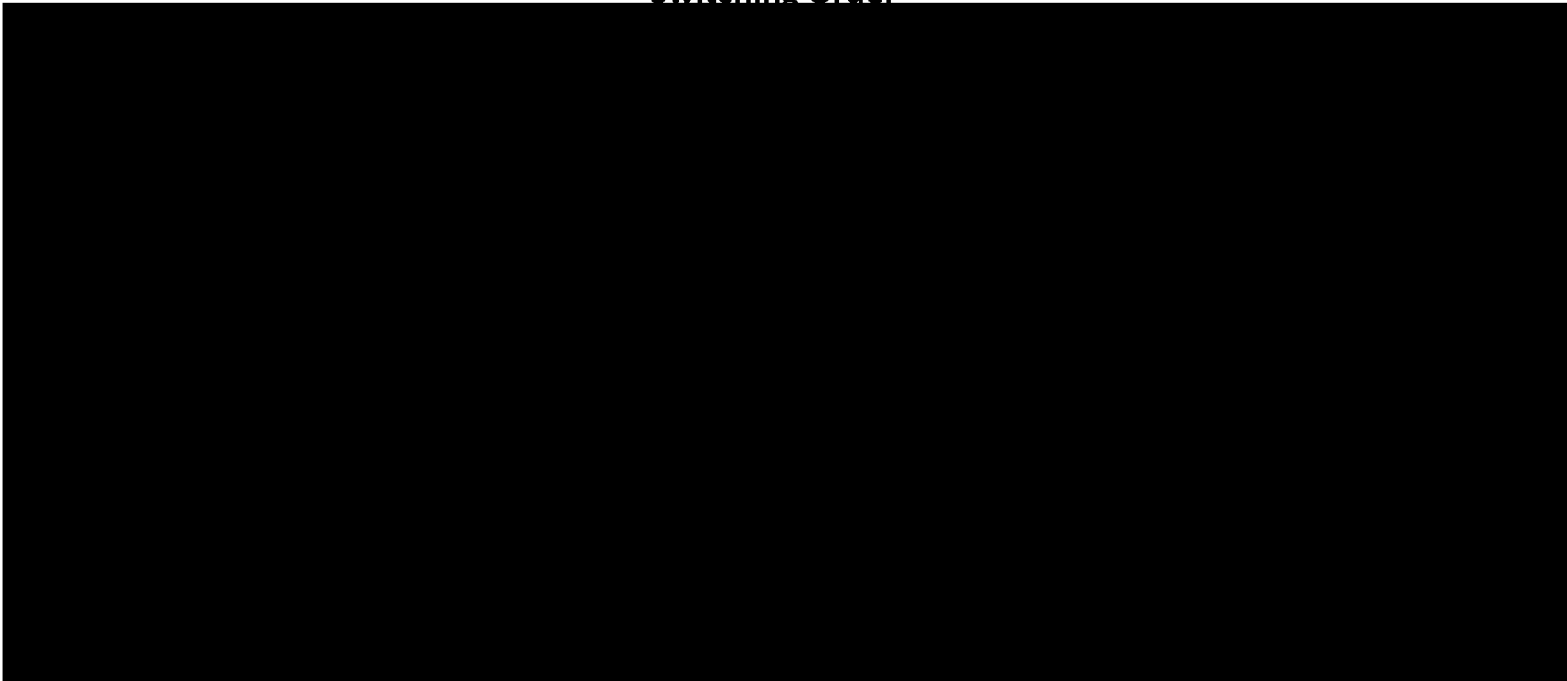
As indicated in Step #1 of the Switching Order PEP-SUB-EOP Restoration Re-Energization Procedure, for any situation that could impact Innergex Renewable Energy Inc. (Innergex) employees, the general public, facility production, surrounding ecosystems, or members of the community, the situation must be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

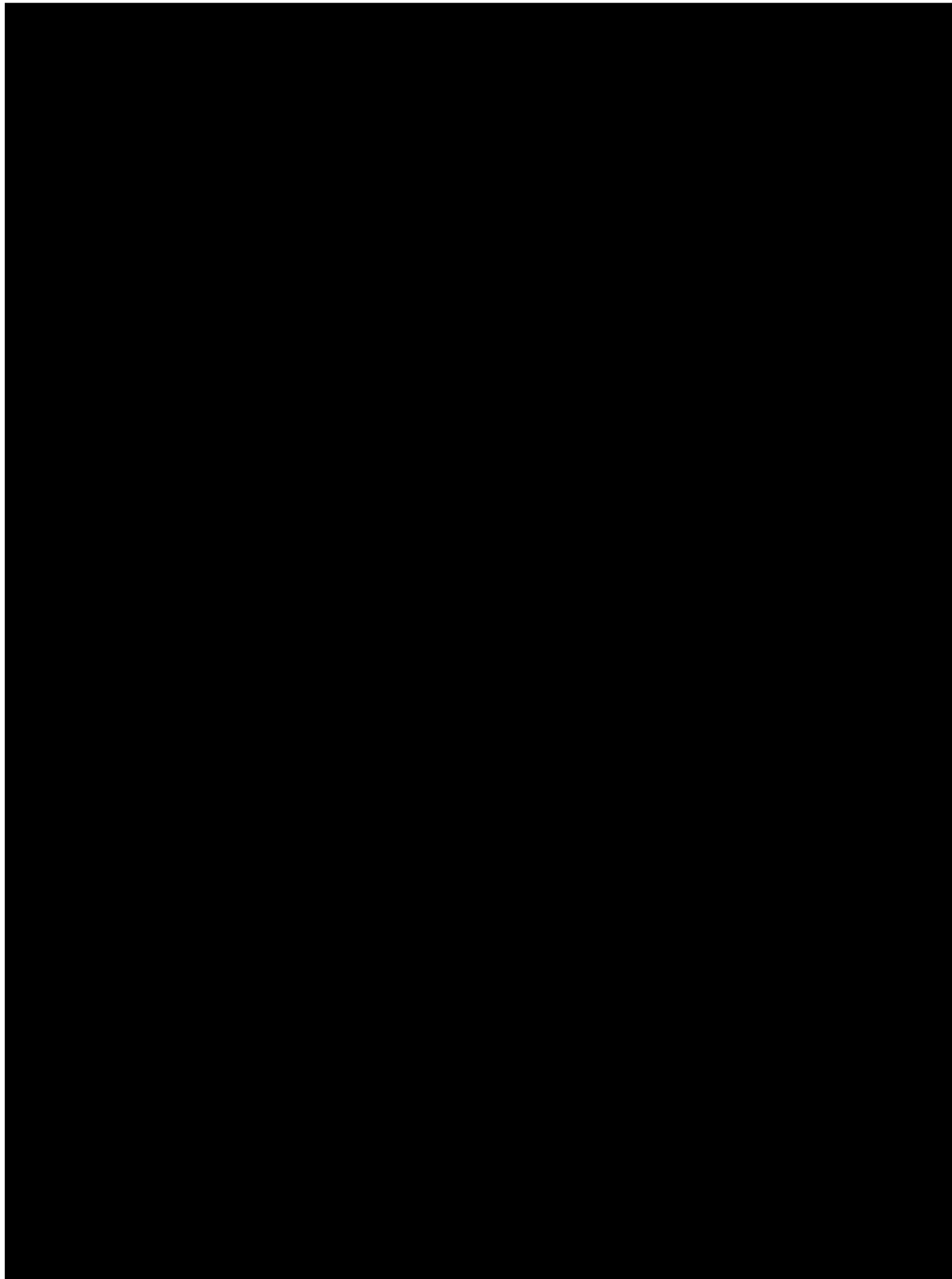
*Note that in no case can the safety of any site personnel be at risk due to the notifications required under this Plan.

[REDACTED]



Attachment G.1 – PEP SUB-EOP Restoration Plan



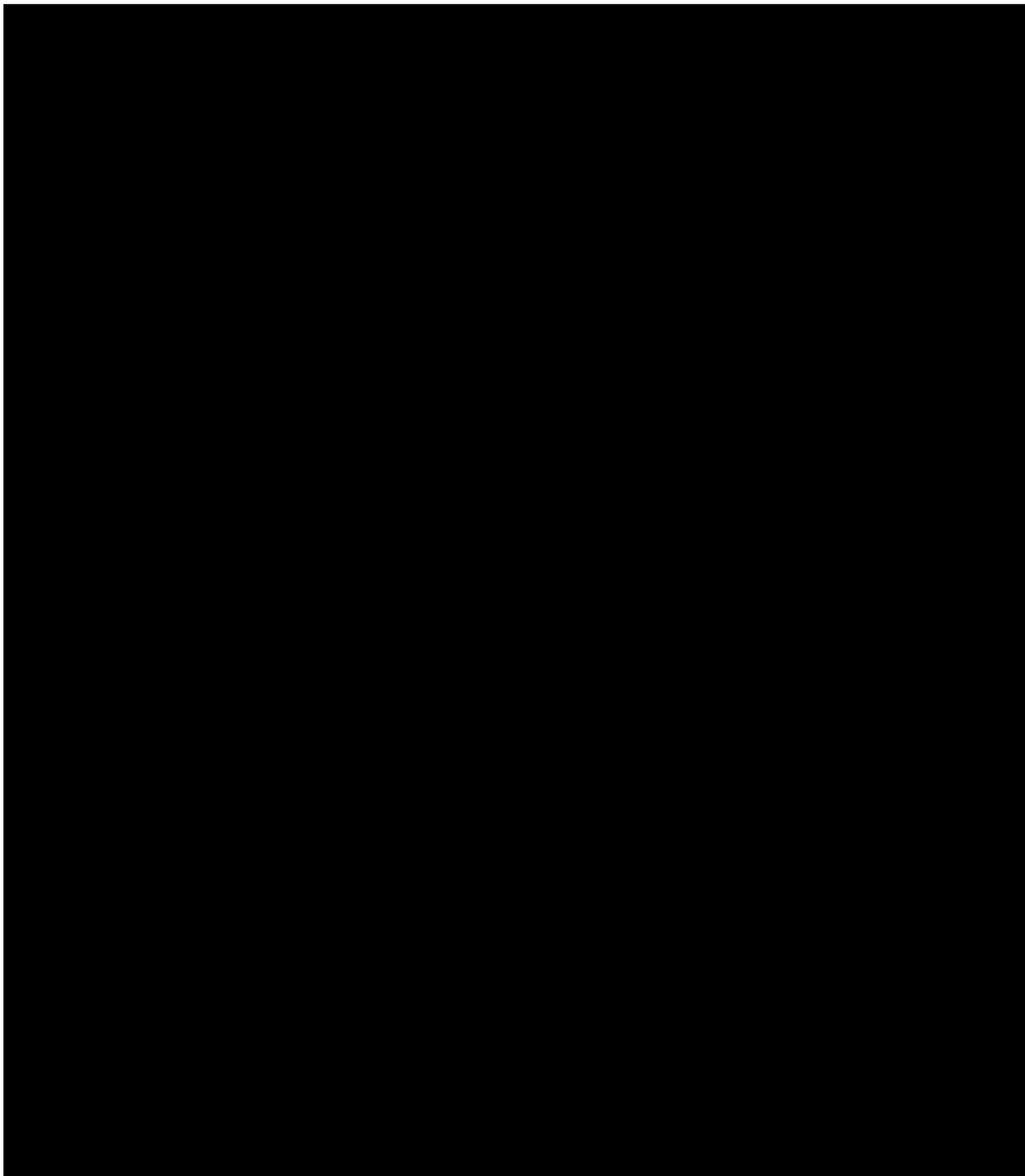


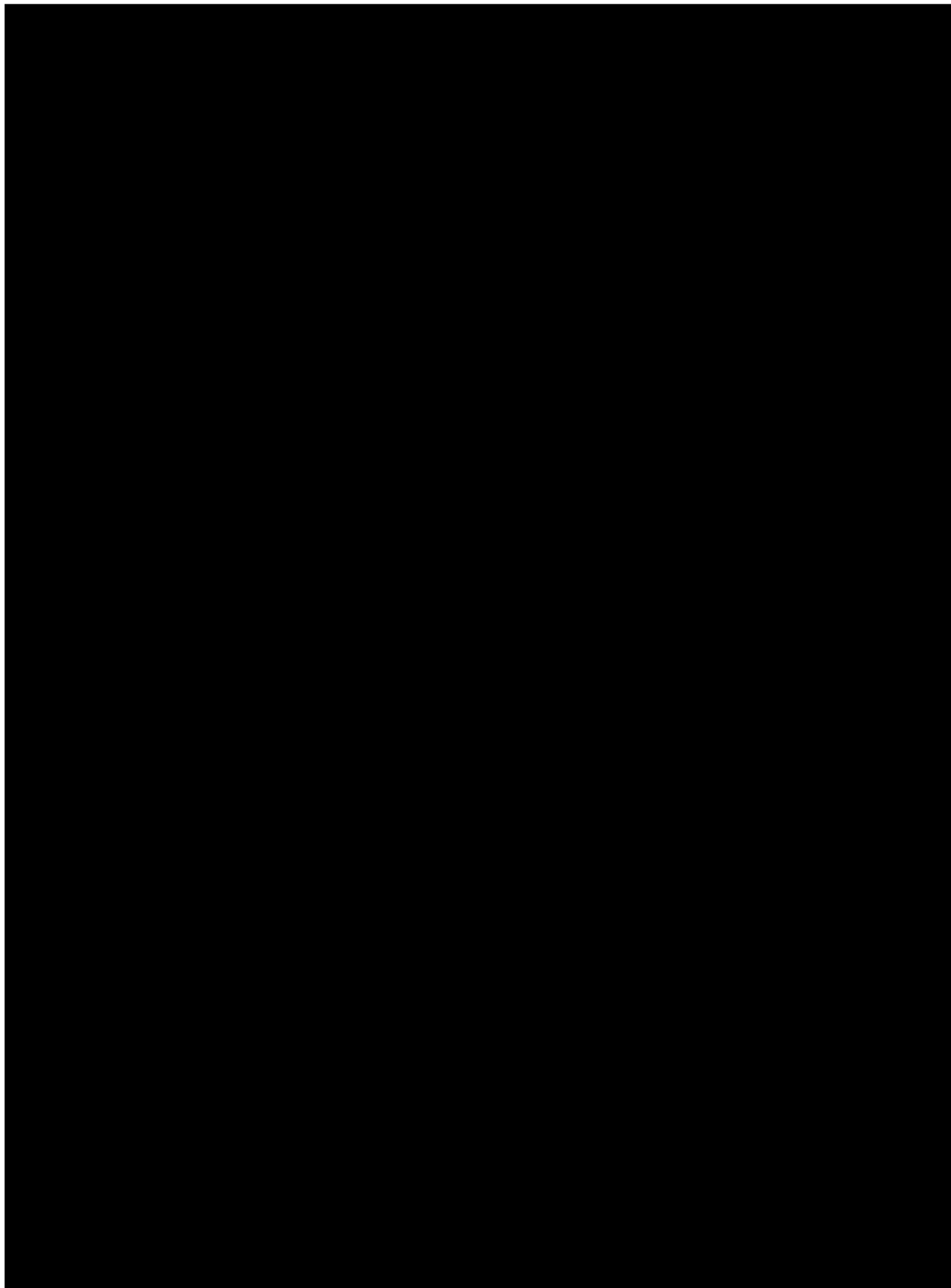


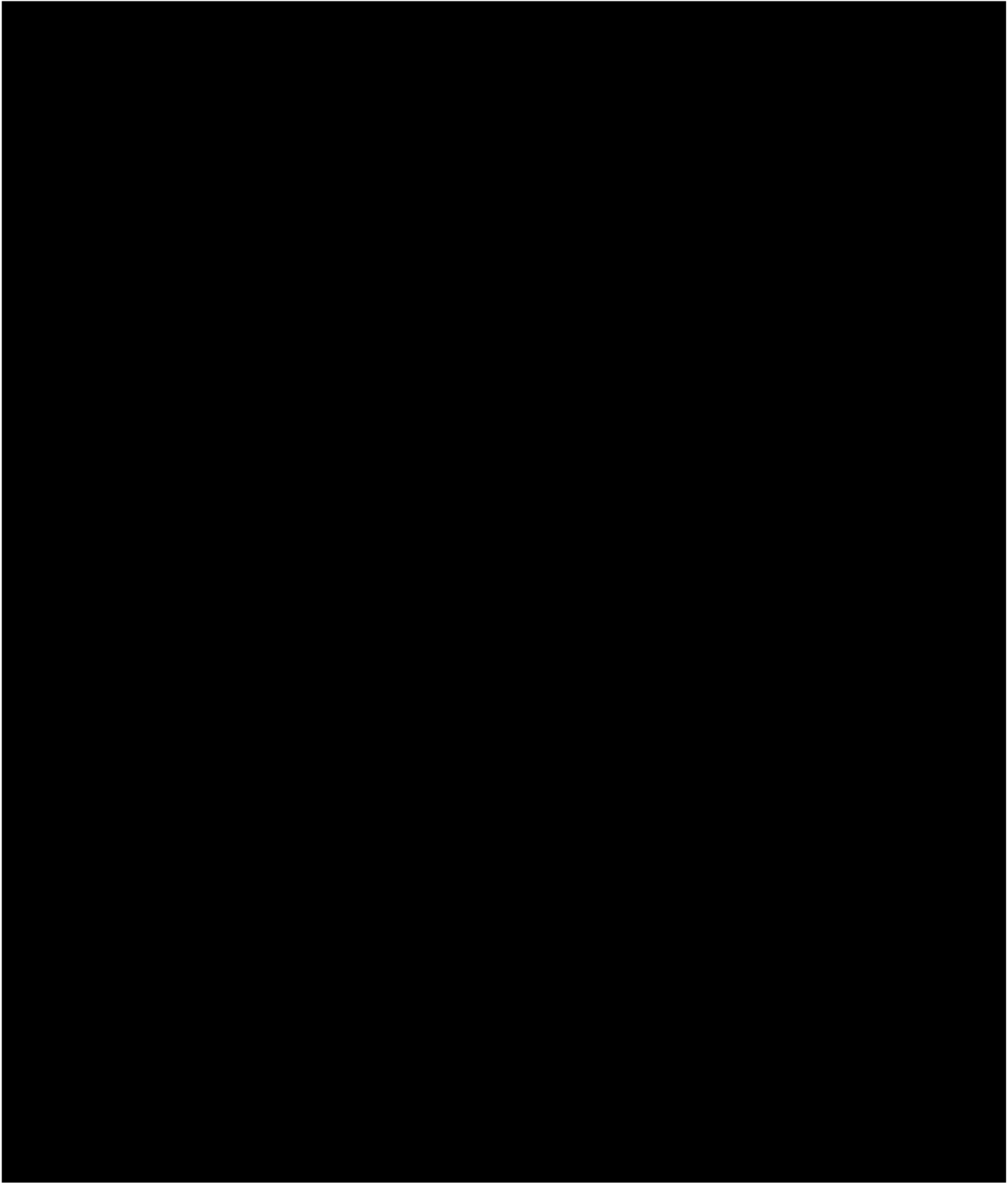
Attachment G.2 – EHS1006 Corporate Emergency Management Guide

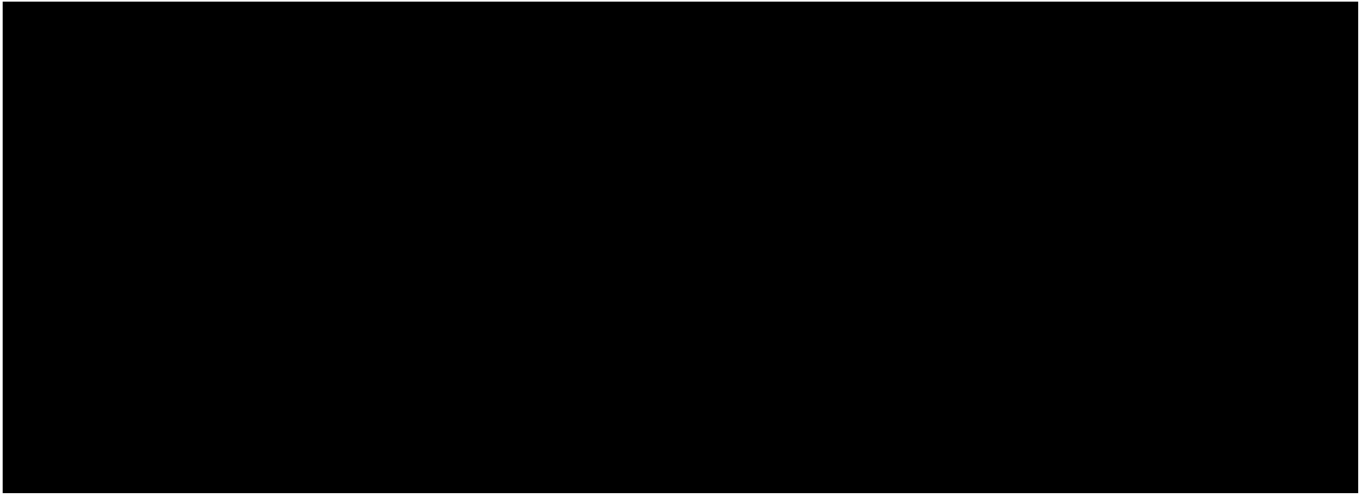
EMERGENCY RESPONSE PLAN

Corporate Emergency Management Guide



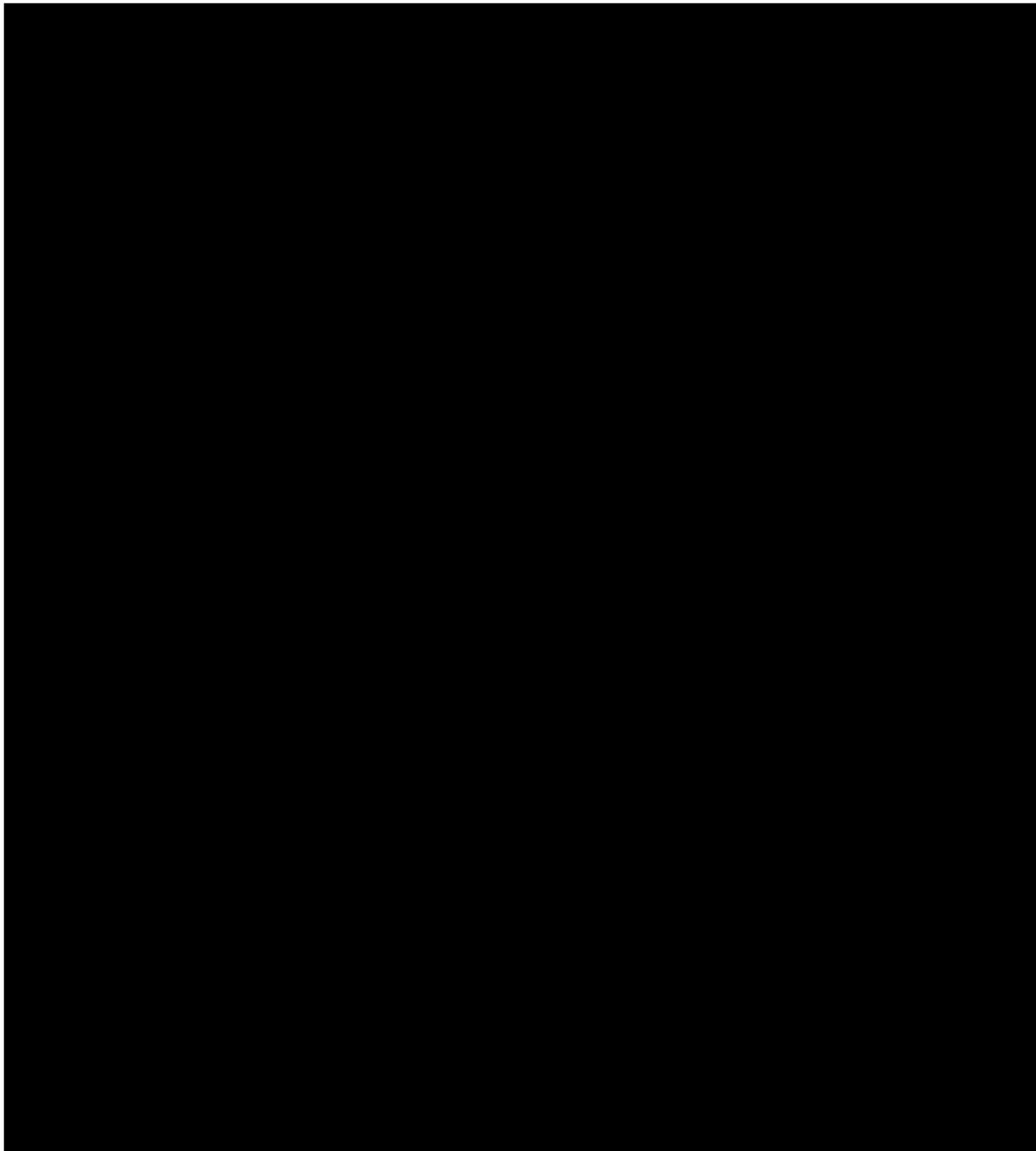


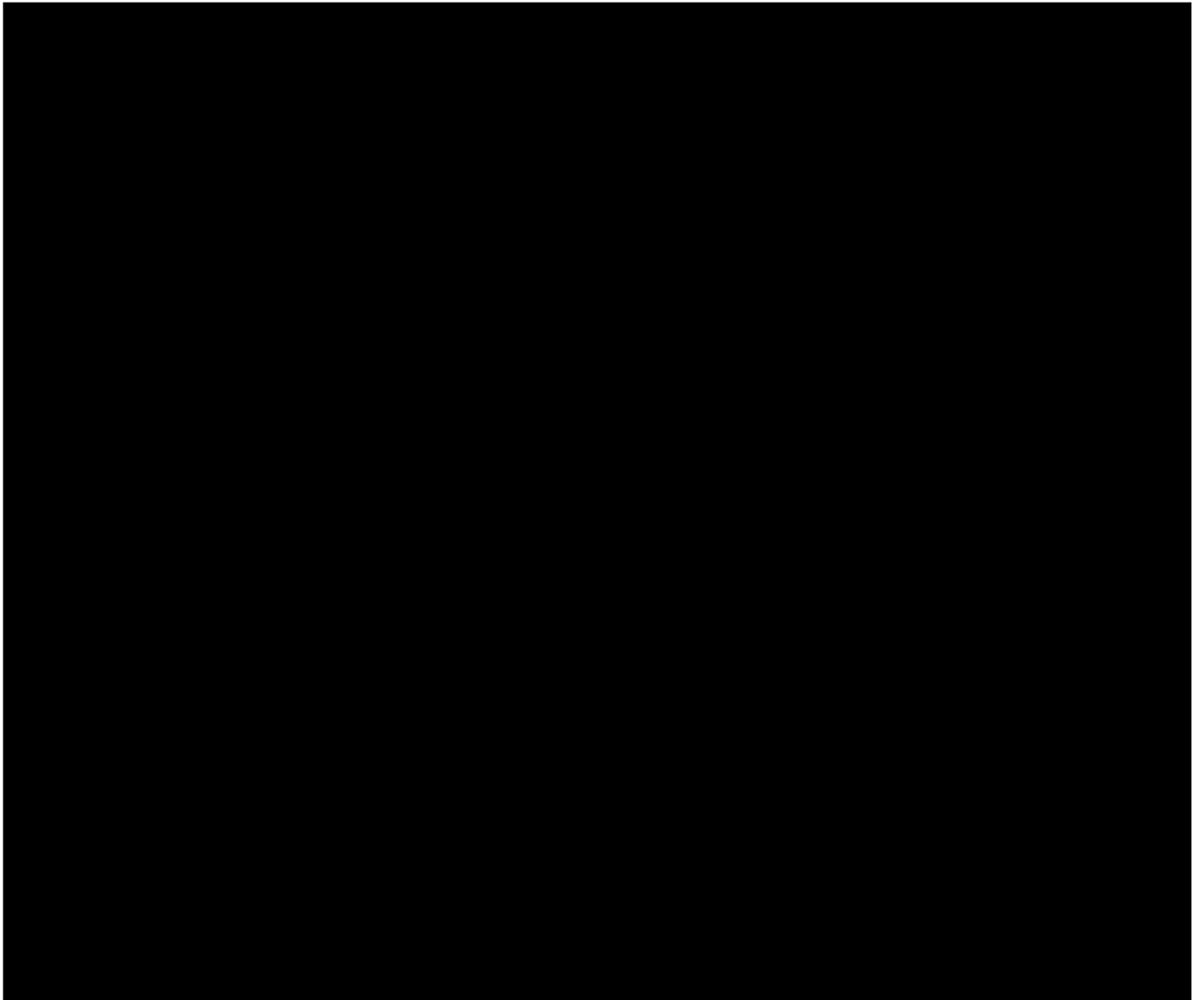




APPENDIX 1

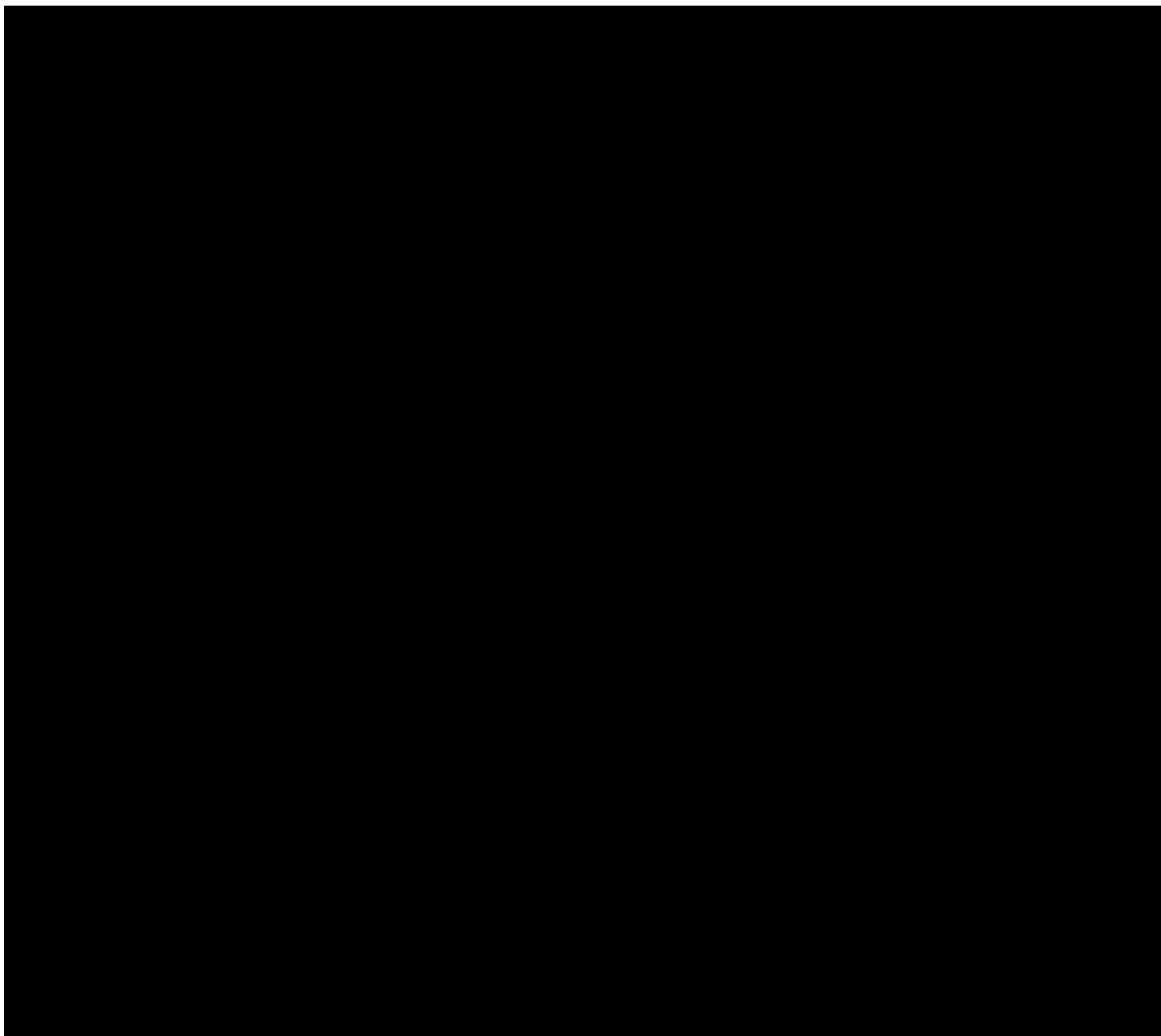
Crisis Assessment





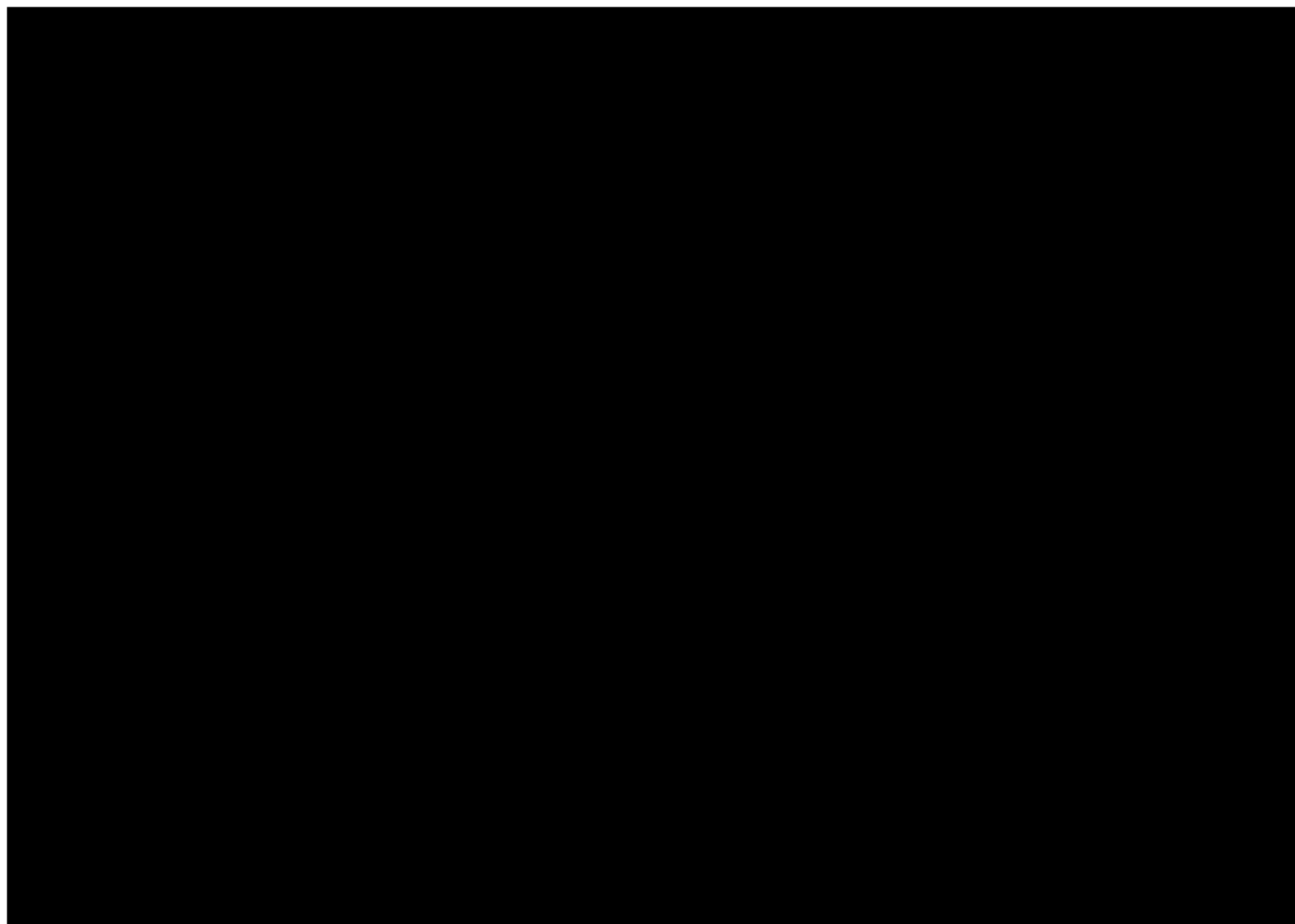
APPENDIX 2

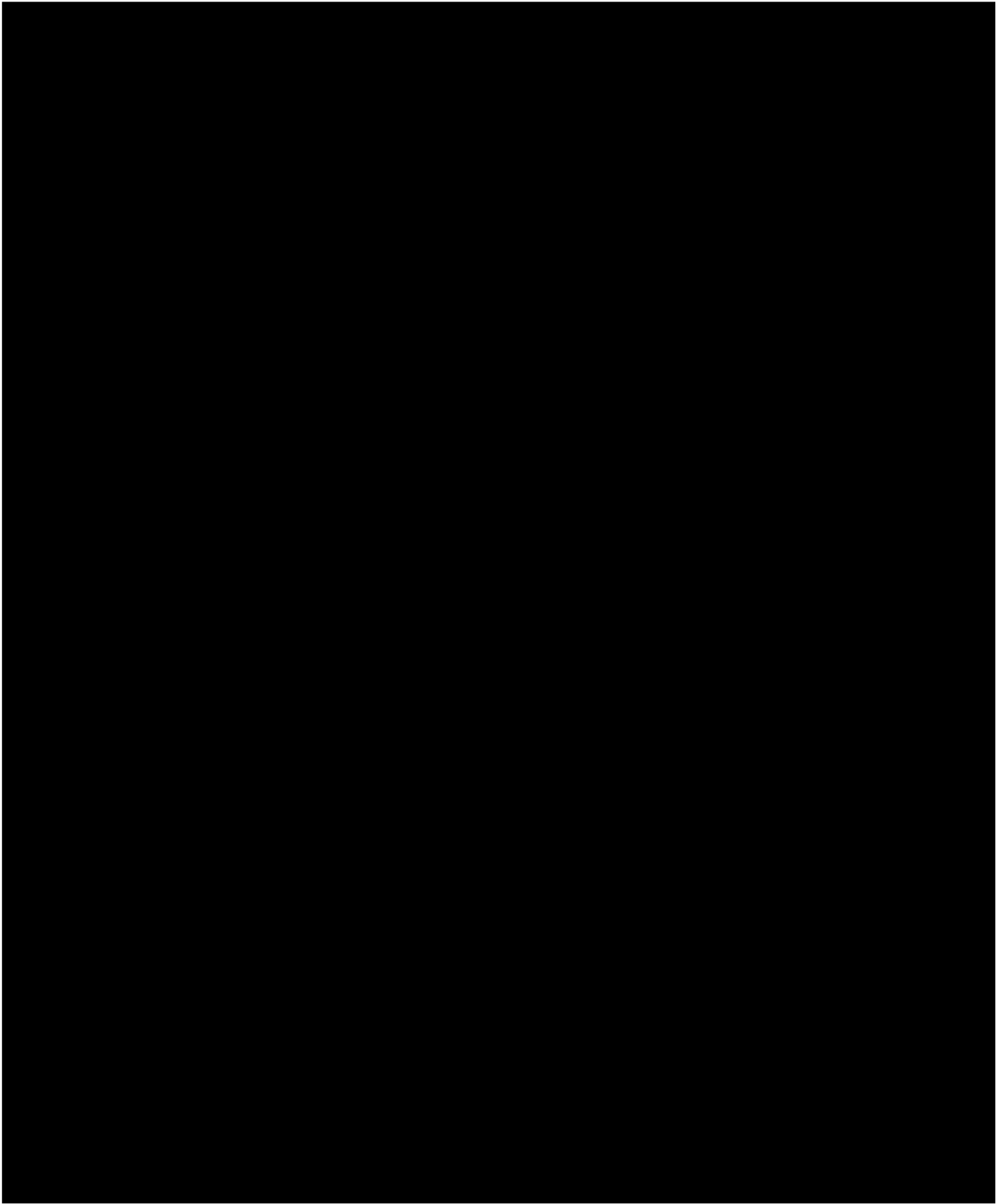
Crisis Information Form

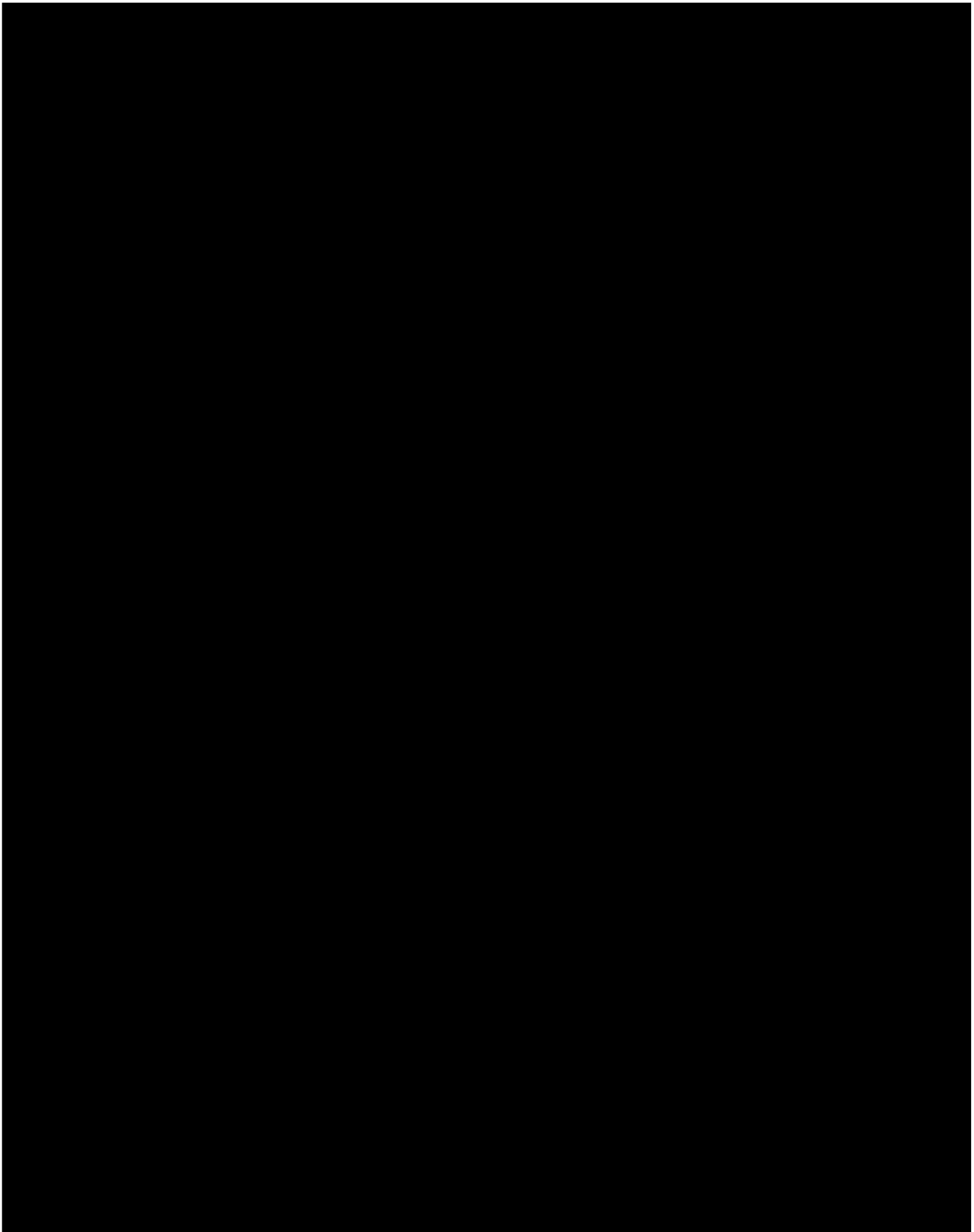


APPENDIX 3

Task List by VP

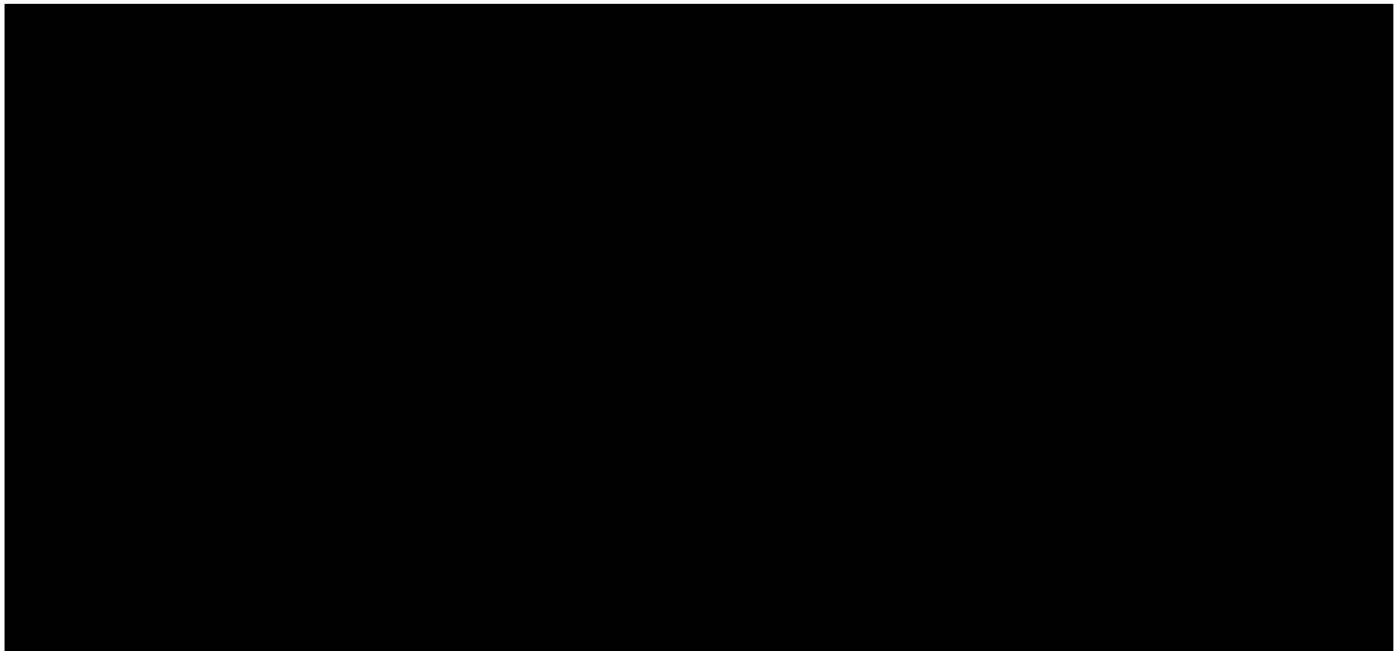


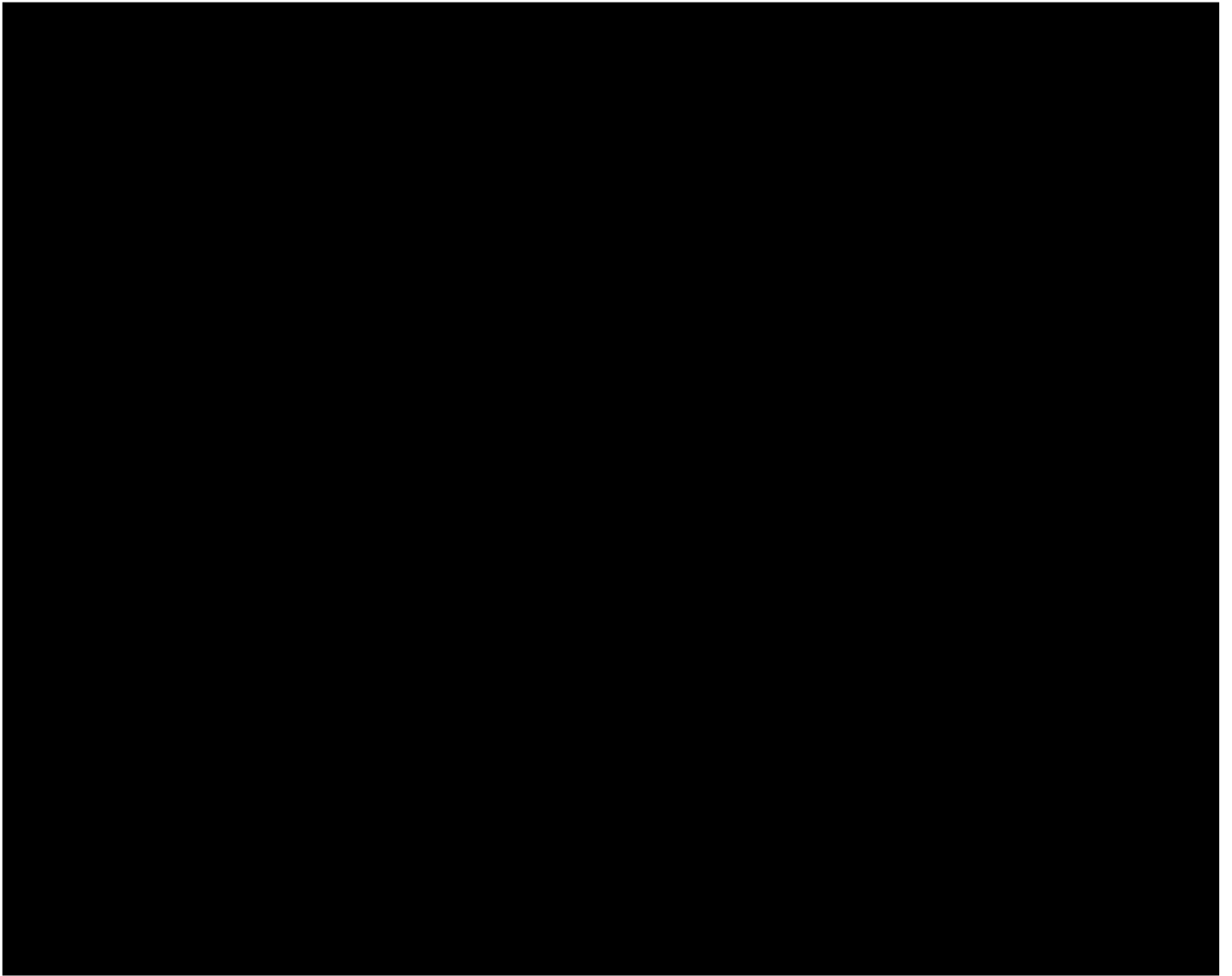


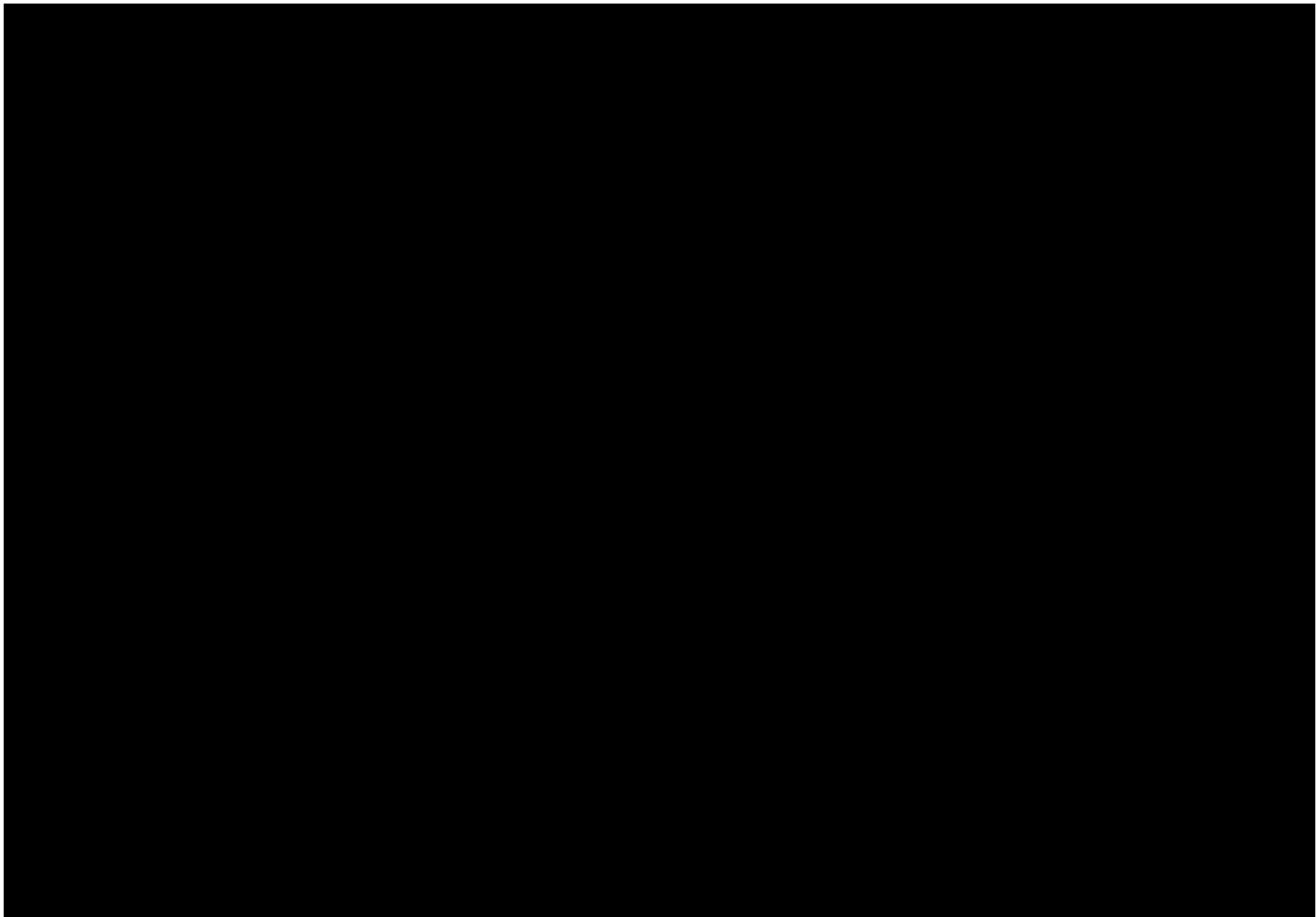


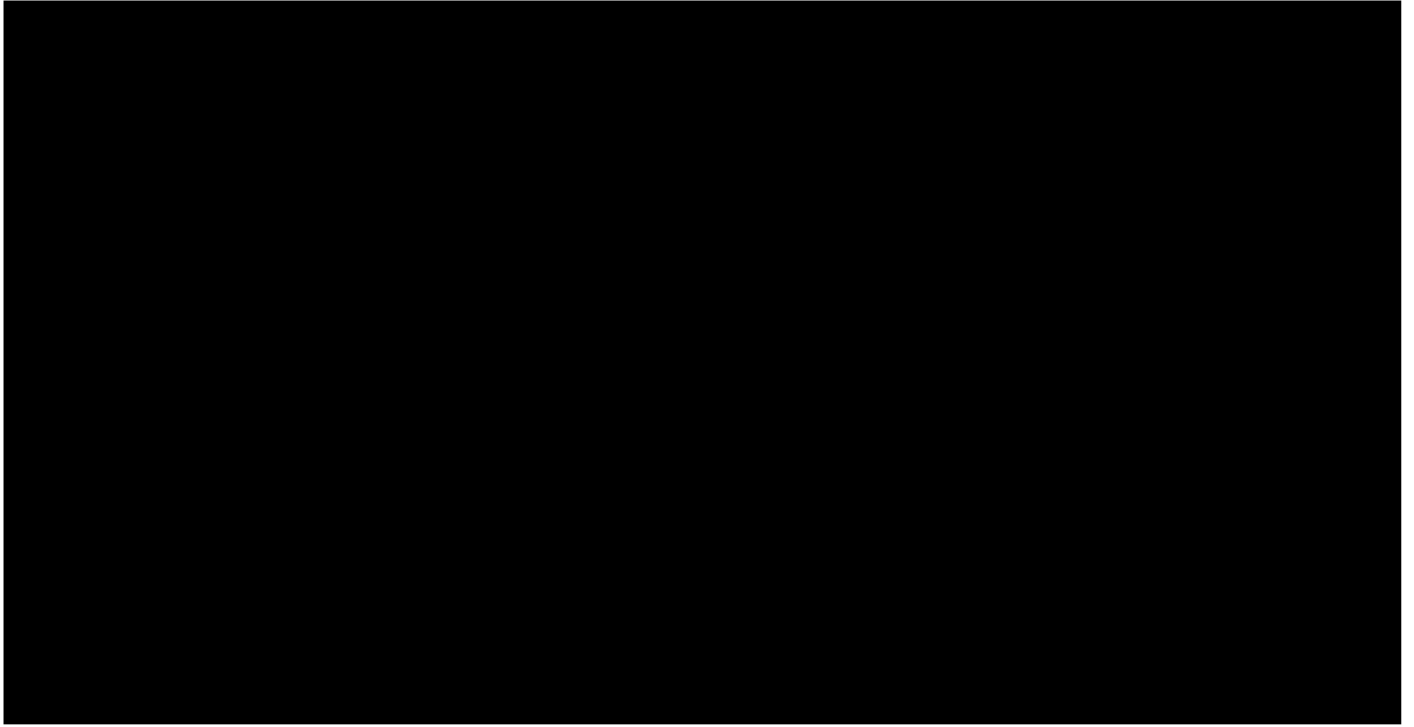


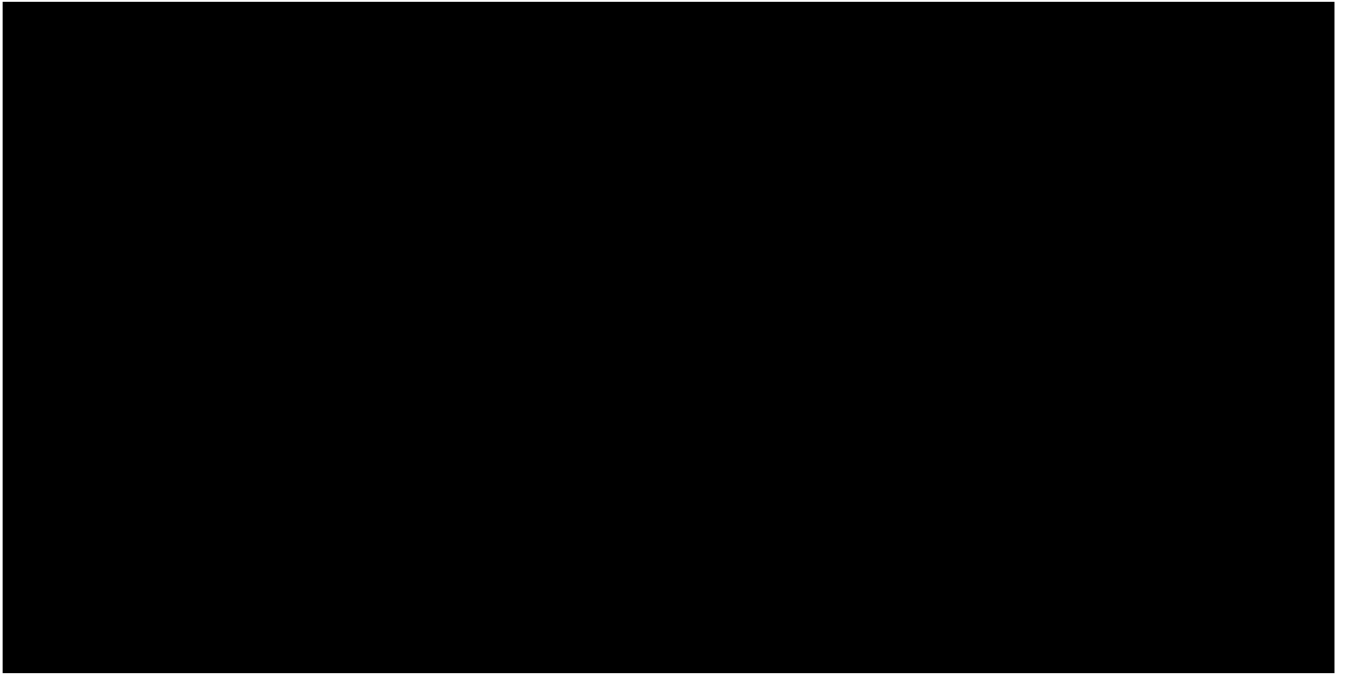


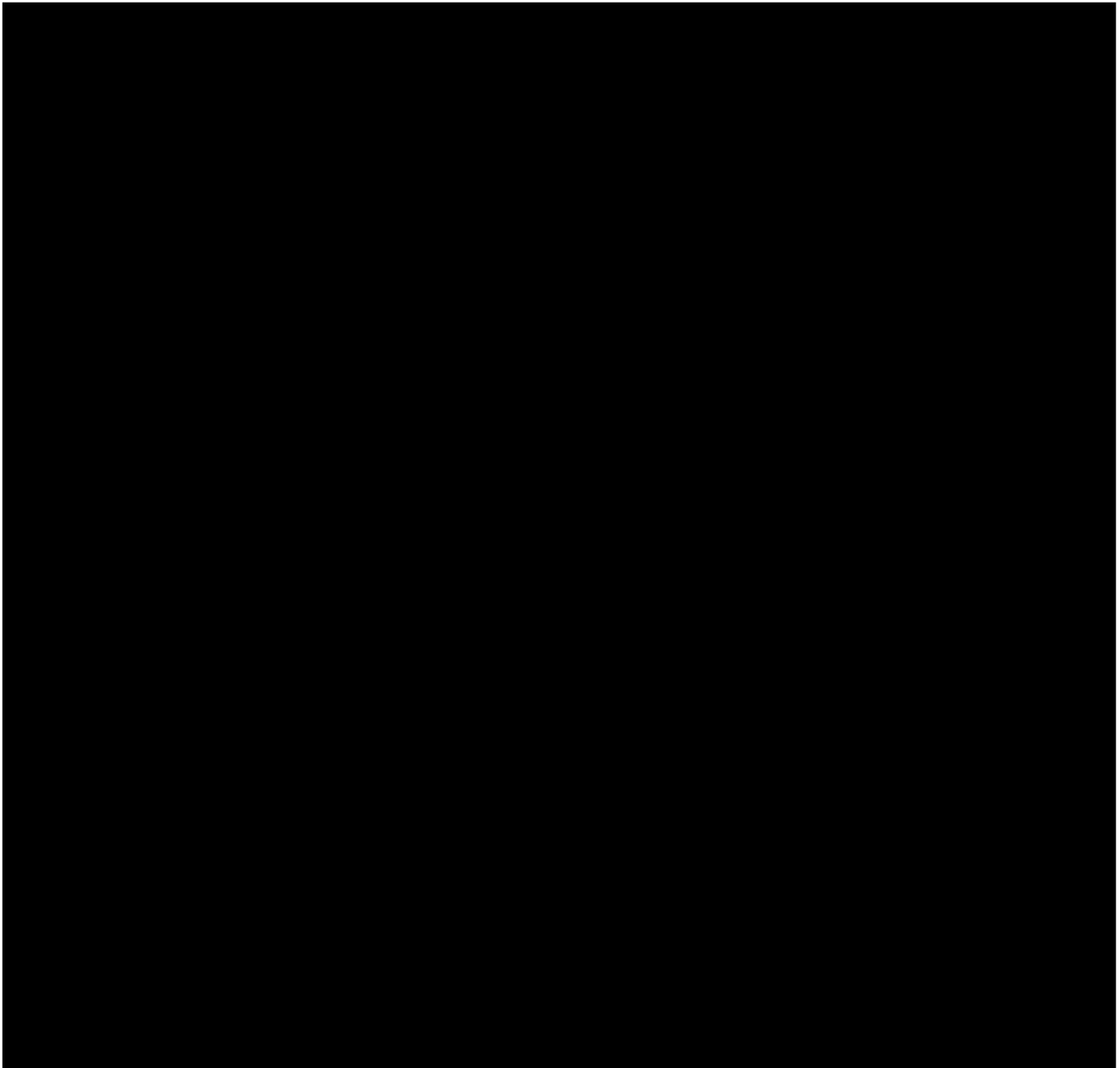






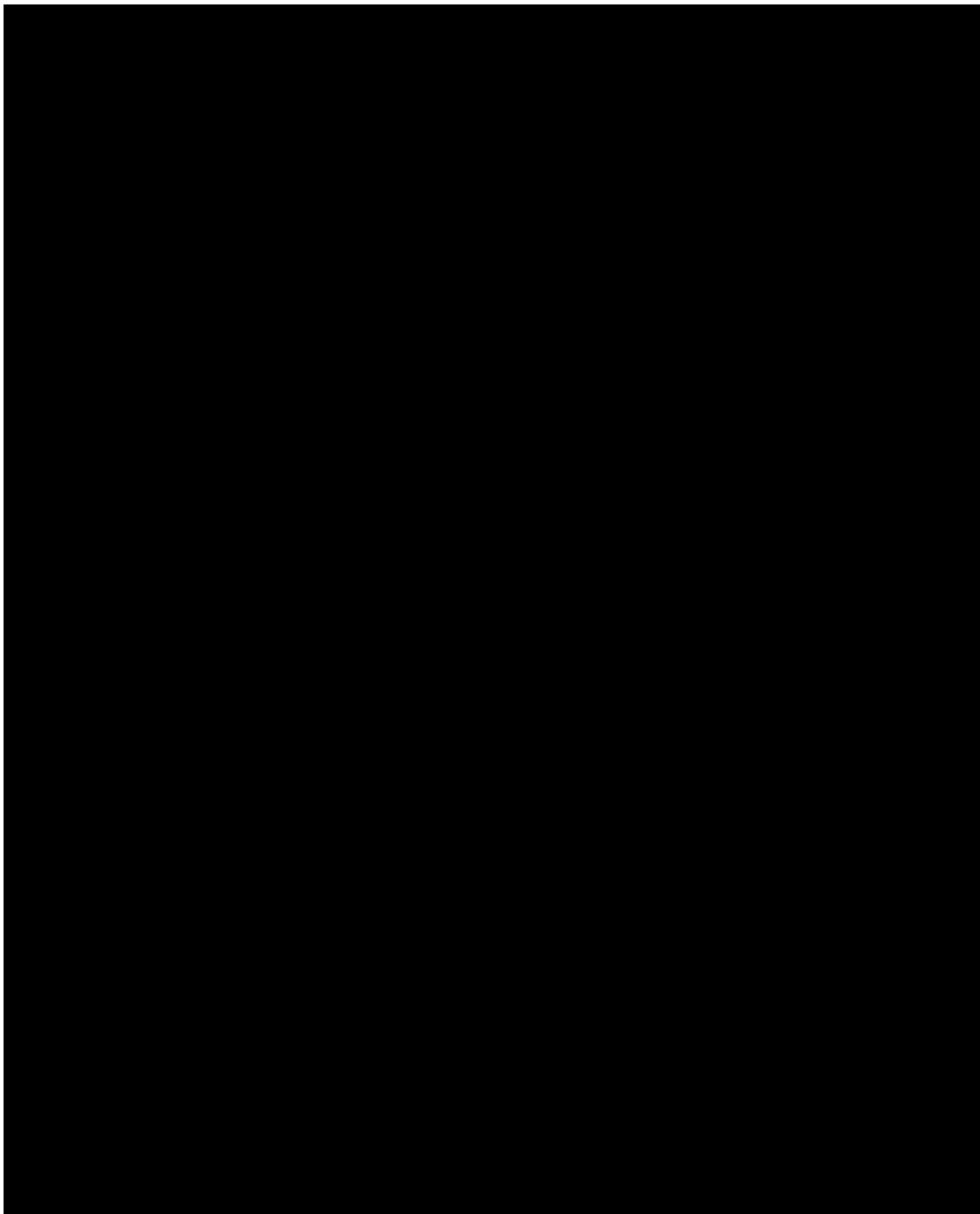






APPENDIX 5

Major potential corporate emergency risks



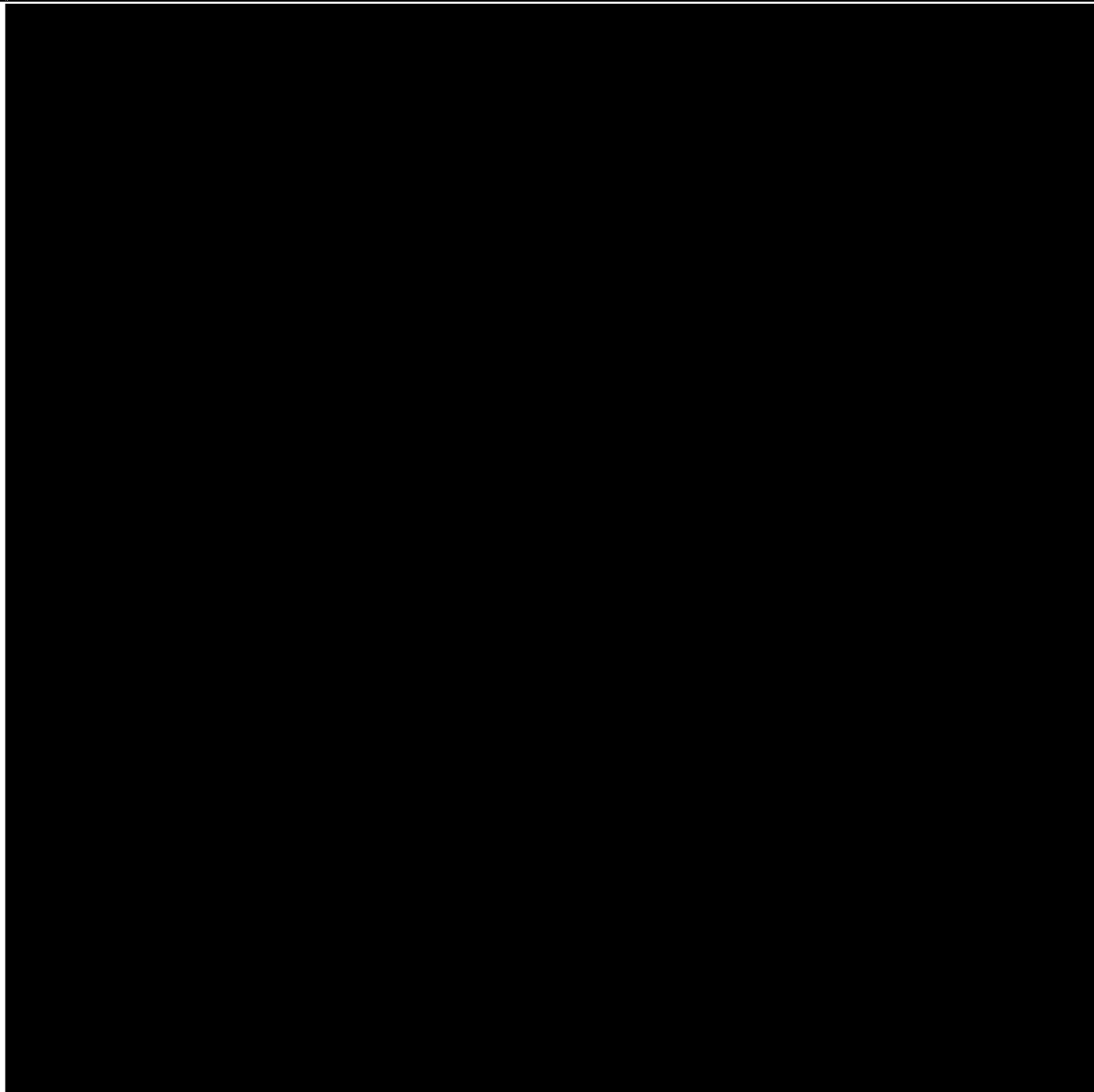
APPENDIX 6

Crisis Management Flowchart

SEE NEXT PAGE

APPENDIX 7

Decision Making Process in the Event of Ransomware



APPENDIX 8

Communication Tools

