Filing Receipt

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Intersect Power

9450 SW Gemini Drive PMB #68743, Beaverton, OR 97008-7105
www.intersectpower.com

April 15, 2022

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP RADIAN, LLC - Project No. 53385 - PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53 - PGC #20661

Dear Filing Clerk,

Pursuant to PUC Substantive Rule 25.53, IP Radian, LLC is filing an emergency operations plan (EOP), executive summary, and affidavit under this section by April 15, 2022. Please note that IP Radian, LLC is in construction with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's non-operational status, many of the filing requirements are not yet applicable to an operating facility and are noted as such and/or are explained in the context of construction.

Statement of intended operational compliance: IP Radian, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

This initial filing includes:

- One (1) copy of the Executive Summary Letter
- One (1) copy of the EOP Executive Summary Table
- One (1) copy of the signed affidavit affirming the content per Section 4(C)
- One (1) copy of Signal Energy's *Radian Solar Project Injury & Illness Prevention Plan (IIPP) Project No. 8735*. (Note: This Plan serves as IP Radian LLC's Emergency Operations Plan during the construction period).
- One (1) copy of Signal Energy's *Special Safety Policy, COVID-19 Infection Control Plan*. (Note: This Plan serves as IP Radian LLC's pandemic and epidemic annex during the construction period).
- One (1) copy of the Emergency Contact Information Form identifying the current Primary, Secondary, and Tertiary Emergency Contacts
- One (1) copy of Signal Energy's Orientation Records

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If you have questions about this submission, please contact energyregulatory@intersectpower.com.

Sincerely,

IP Radian, LLC
a Delaware limited liability company

By:_____
Name: Luke Dunnington
Title: President

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April 15, 2022

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP Radian, LLC - Emergency Operations Plan Filing for PGC Registration #20661 - Executive Summary

Pursuant to PUC Substantive Rule 25.53, IP Radian, LLC submits an executive summary. Please note that IP Radian, LLC is in construction with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted in the table below.

Statement of intended future compliance: IP Radian, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

Rule 25.53; Filing Requirements, Section 1(A)(i)		Explanation of Project Construction Status
I	Describes the contents and policies contained in the EOP	The project is currently in construction and no operating personnel is currently present. During construction the project utilizes Signal Energy's *Radian Solar Project Injury & Illness Prevention Plan (IIPP) Project No. 8735* as the EOP for the construction phase. Please see the attached table referencing the content and policies contained in the IIPP.
II	Includes reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule	Please see attached table summarizing the content and policies contained in the IIPP with Section and Page Number references corresponding with the requirements of the rule.
III	Includes the record of distribution required under 4A	Safety Communication is governed by Section C: Safety Communication confirming

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		that changes to safety policies are communicated to all affected employees and training may be provided. Training policies are stated in Section G and documented accordingly per Section N. Please refer to the orientation records identifying the individuals that have received training on the contents of the IIPP and access to the IIPP.
IV	Contains the affidavit required under 4C	Please see the attached affidavit

Attachments:

- EOP Executive Summary Table
- Orientation records
- Affidavit

Executive Summary Table

Please note that IP Radian, LLC is being constructed for Intersect Power, LLC as the client/owner, with Signal Energy, LLC performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted and the project is utilizing Signal Energy's Radian Solar Project Injury & Illness Prevention Plan Project No. 8735 as the interim EOP until operations.

Statement of intended future compliance: IP Radian, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD and commencing operations.

Executive Summary Table

Ref	Item	Signal Energy's IIPP Content	Signal Energy's IIPP Reference (Page Numbers reference PDF)
d	**Information to be included in the emergency operations plan**	N/A	N/A
	An EOP may consist of one or multiple documents. Each entity's EOP must include the information identified below, as applicable. **If a provision in this section does not apply to an entity, the entity must include in its EOP an explanation of why the provision does not apply**	N/A	N/A
d1	**An approval and implementation section that:**	N/A	N/A
d1A	introduces the EOP and outlines its applicability;	This section identifies in Section 1.2 that Signal Energy and their subcontractors are to perform on the project according to this IIPP document.	Section A: Management Commitment and Assignment of Responsibilities Introduction (Pg 3); Section B: ALL Safe Program (Pg 11)
d1B	lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;	This section identifies the name, contact information, and responsibility/roles from Signal Energy that are responsible for maintaining and implementing the EOP. The Safety Manager is responsible for developing site specific IIPPs.	Section A: Management Commitment and Assignment of Responsibilities (Pg 3; 7)
d1C	provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (1) of this subsection;	The Table of Contents identifies the latest revision date to each Section of Signal Energy's IIPP.	Table of Contents (Inclusive of Section Revision # and Dates) (Pg 2)
d1D	provides a dated statement that the current EOP supersedes previous EOPs; and	The Original Date of Issue was March 3, 2020. The current version is dated July 8, 2021.	Cover Page (Header and Footer)
d1E	states the date the EOP was most recently approved by the entity.	The Table of Contents identifies the latest revision date of Signal Energy's IIPP.	Table of Contents (Reflects Revision Date and Issued By) (Pg 2)
d2	**A communication plan**	Signal Energy's IIPP addresses their policy on External Meetings and Communications.	Section L: Control of Work (pg 50)
d2B	An entity with generation operations must describe the procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.	Signal Energy's IIPP External Meetings and Communications policy affirms they will conduct meetings and manage correspondence with external agencies and individuals, including but not limited to local EMS, Fire Department, Medical Clinics, and Police. The IIPP's Emergency Action Plan includes contact information and the plan to address emergency events inclusive of a Communications Officer role and media control.	Section L: Control of Work (pg 50) Section Q: Emergency Action Plan (pg 70, 79)
d3	**A plan to maintain pre-identified supplies for emergency response.**	Signal Energy's IIPP addresses adequate water supply and access, heat illness prevention, and weather monitoring.	Section I: Water Supply and Heat Illness Prevention (pg 28-34)
d4	**A plan that addresses staffing during emergency response**	Signal Energy's IIPP addresses Severe Weather and Geological Safety Plan (Section R) including Hurricanes/Tropical Storms. Staffing is addressed through identification of "Critical Personnel" and subsequent timing and triggers for evacuation.	Section R: Severe Weather and Geological Safety Plan (pg 84)
d5	**A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP**	Signal Energy's IIPP addresses Severe Weather and Geological Safety Plan (Section R) including the monitoring of weather alerts.	Section R: Severe Weather and Geological Safety Plan (pg 82)
d6	**Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.**	N/A	N/A
e	**Annexes to be included in the emergency operations plan.**	N/A	N/A
e2	An electric cooperative, an electric utility, or a municipally owned utility that operate a generation resource in Texas; and a PGC must include the following annexes for its generation resources other than generation resources authorized under PURA §39.918:	N/A	N/A
e2A	**A weather emergency annex that includes:**	Signal Energy's IIPP includes an Emergency Action Plan and Severe Weather and Geological Safety Plan.	Section R: Severe Weather and Geological Safety Plan (pg 82-91) Section Q: Emergency Action Plan (70-81)
e2Ai	operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;	Signal Energy's IIPP addresses Severe Weather and Geological Safety Plan (Section R) including Hurricanes/Tropical Storms and evacuation. IP Radian LLC will implement an operational based EOP that will address these requirements, 30 days prior to COD.	Section R: Severe Weather and Geological Safety Plan (pg 82-91)
e2Aii	verification of the adequacy and operability of fuel switching equipment, if installed; and	IP Radian, LLC is being constructed for Intersect Power, LLC as the client/owner, by Signal Energy, LLC. The site backup power system is being designed, installed, and commissioned. Verification of operability will be completed 30 days prior to COD.	N/A
e2Aiii	a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency;	Signal Energy's IIPP addresses Evacuation Routes, staffing including the identification of "Critical Personnel", evacuation timing, and preparation for various event types.	Section R: Severe Weather and Geological Safety Plan (pg 82-91) Section Q: Emergency Action Plan (70-81)

Ref	Item	Signal Energy's IIPP Content	Signal Energy's IIPP Reference (Page Numbers reference PDF)
e2B	**A water shortage annex that addresses supply shortages of water used in the generation of electricity;**	This is not applicable due to the generation type (PV). Solar generation is not dependent upon water.	N/A
e2C	**A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;**	IP Radian, LLC is being constructed for Intersect Power, LLC as the client/owner, with Signal Energy, LLC performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's current non-operational status, this requirement is not yet applicable.	N/A
e2D	**A pandemic and epidemic annex;**	Signal Energy has issued and follows a *Special Safety Policy, COVID-19 Infection Control Plan*.	COVID-19 Infection Control Plan (pg 1-10)
e2E	**A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;**	Signal Energy's IIPP addresses Severe Weather and Geological Safety Plan including Hurricanes/Tropical Storms and evacuation. Daily Plan of the Day, Tailgate, Job Safety and Analysis, and Weekly Safety and Safety Steering Committee meetings are held to address work plans and safety. Signal Energy's IIPP Section Q Emergency Action Plan also addresses Project Emergency Evacuation.	Section R: Severe Weather and Geological Safety Plan (pg 82-85) Section L: Control of Work (pg 49-50) Section Q: Emergency Action Plan (pg 79)
e2F	**A cyber security annex;**	IP Radian, LLC is being constructed for Intersect Power, LLC as the client/owner, with Signal Energy, LLC performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's current non-operational status, this requirement is not yet applicable.	N/A
e2G	**A physical security incident annex; and**	Signal Energy's IIPP addresses physical security in the Emergency Action Plan which affirms security personnel are present to not interfere with access or egress at the entrance in the event of an emergency, the Communications and Accountability Officer will secure a daily security report in the event of an evacuation.	Section T-8 Fire Prevention (pg 125-127) Section Q: Emergency Action Plan (pg 79, 80)
e2H	Any additional annexes as needed or appropriate to the entity's particular circumstances	NA	NA

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April 12, 2022

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP Radian, LLC - Emergency Operations Plan Filing for PGC Registration #20661 - Affidavit

Pursuant to PUC Substantive Rule 25.53, IP Radian, LLC submits an affidavit executed by the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the below. Please note that IP Radian, LLC is being constructed for Intersect Power, LLC as the client/owner, with Signal Energy, LLC performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in late 2022/early 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted and the project is utilizing Signal Energy's *Radian Solar Project Injury & Illness Prevention Plan Project No. 8735* as the interim EOP until operations.

Statement of intended future compliance: IP Radian, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

	Rule 25.53; Filing Requirements, Section 4(C)(i-vi)	**Explanation of Project Construction Status**
i	Relevant operating personnel are familiar with and 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 project is currently in construction and no operating personnel are currently present. During construction, the project utilizes Signal Energy's *Radian Solar Project Injury & Illness Prevention Plan (IIPP) Project No. 8735*. Signal Energy requires all project employees engaged in work at the Radian project to receive training (Section G) and documents training (Section N).
ii	The EOP has been reviewed and approved by the appropriate executives;	The project is currently in construction and Signal Energy's IIPP identifies Management

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		Commitment and Assignment of Responsibilities (Section A) including a signed statement from Signal Energy's President and the names and contact information of Management including the Safety Manager, VP of HSE, and Senior Safety Manager. Additionally, the IIPP identifies the Approval by Signal Energy and Date of Issue information on the title page.
iii	Drills have been conducted to the extent required by subsection (f) of this section;	The project is currently in construction and no operationally focused drills are able to be conducted prior to initial filing by April 15, 2022. The project will conduct drills to the extent required by subsection (f) prior to and closer to commencing Commercial Operations. In the interim, Signal conducts training on the IIPP as described above.
iv	The EOP or an appropriate summary has been distributed to local jurisdictions as needed;	Signal Energy will conduct meetings and correspondence as needed with external agencies including local EMS, Fire, Medical Clinics, and Police, to facilitate the safe conduct of the project per their IIPP (Section L).
v	The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and	Signal Energy's IIPP maintains Plans and Procedures governing events and incidents for the construction period. Topics include Event Investigation and Reporting Procedures (Section F); Safety Inspections (Section H); Risk Assessment (Section P); Emergency Action Plan (Section Q) inclusive of an Incident Commander role, Severe Weather and Geological Safety Plan (Section R), and Emergency Action Plan (Section Q).

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vi	The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training	The project is currently in construction and no operational emergency management personnel have been designated to interact with emergency officials. The appropriate personnel will be identified and trained prior to and closer to commencing Commercial Operations. Signal Energy will conduct meetings and correspondence with external agencies as needed per their IIPP (Section L).

Reviewed and affirmed by:

By:_____
Name: Lucas Dunnington
Title: President
IP Radian, LLC
a Delaware limited liability company

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

State of California)
) ss.
County of Alameda)

On April 12, 2022 before me, Breana Luster, Notary Public, personally appeared Lucas Dunnington, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

Signature Breana Luster (Seal)

BREANA LUSTER
COMM. #2348583
Notary Public - California
Alameda County
My Comm. Expires Feb. 23, 2025

SIGNAL ENERGY
CONSTRUCTORS

Radian Solar Project Project #8735	Brownwood, TX	Revision: Rev. 1
	Date: July 8, 2021	

Radian Solar Project Injury &

Illness Prevention Plan Project

No. 8735

Original Date of Issue: March 3, 2020

Approval by Signal Energy: Ed Pontis