



## Filing Receipt

**Received - 2022-04-15 05:00:10 PM**  
**Control Number - 53385**  
**ItemNumber - 173**

## Executive Summary

This Executive Summary provides an overview of Concho Valley Electric Cooperative, Inc. (“Cooperative’s”) process for maintaining all aspects of Cooperative’s business following various disasters in compliance with 16 Tex. Admin. Code § 25.53, Public Utility Commission of Texas’ (“PUCT”) substantive rule regarding Electric Service Emergency Operations Plan (“Rule”).

Table 1 provides an overview of the contents and policies included in Cooperatives Emergency Operations Plan (“Plan”).

*Table 1 Overview of Contents and Policies included in Plan*

| <b>Policy</b>                                | <b>Section</b> | <b>Page</b> |
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Table 2 provides an overview of the Plan's compliance with the Rule.

*Table 2 Reference Table*

| <b>CITATION</b>       | <b>DESCRIPTION OF REQUIREMENT</b>   | <b>APPLICABILITY</b> | <b>EOP SECTION</b>                       | <b>EOP PAGE #</b> |
|-----------------------|---|----------------------|--|-------------------|
| 25.53(d)(1)(A-E)      | APPROVAL AND IMPLEMENTATION SECTION   | YES                  | I  | 8-10              |
| 25.53(d)(2)(A)        | COMMUNICATION PLAN FOR ENTITIES WITH TRANSMISSION OR DISTRIBUTION SERVICE   | YES                  | III                                      | 15-17             |
| 25.53(d)(2)(B-D)      | COMMUNICATION PLAN FOR GENERATORS, REP AND ERCOT  | NO                   |  |                   |
| 25.53(d)(3)           | PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE   | YES                  | IV, Appendix C, Appendix D               | 18-20, 107, 108   |
| 25.53(d)(4)           | PLAN THAT ADDRESSES STAFFING DURING EMERGENCY RESPONSE  | YES                  | II                                       | 11-14             |
| 25.53(d)(5)           | 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 | YES                  | V  | 24-25             |
| 25.53(e)(1)(A)(i-ii)  | WEATHER EMERGENCY ANNEX   | YES                  | VI.A, Appendix C, Appendix D, Appendix G | 27, 107, 108, 113 |
| 25.53(e)(1)(B)(i-iii) | LOAD SHED ANNEX   | YES                  | VI.B                                     | 28-29             |
| 25.53(e)(1)(C)        | A PANDEMIC AND EPIDEMIC ANNEX   | YES                  | VI.C                                     | 31-38             |
| 25.53(e)(1)(D)        | A WILDFIRE ANNEX  | YES                  | VI.D                                     | 39                |

|                  |  |     |       |       |
|------------------|--|-----|-------|-------|
| 25.53(e)(1)(E)   | A HURRICANE ANNEX THAT INCLUDES EVACUATION AND RE-ENTRY PROCEDURES FACILITIES ARE LOCATED WITHIN A HURRICANE EVACUATION ZONE, AS DEFINED BY THE TEXAS DIVISION OF EMERGENCY MANAGEMENT (IDEM);   | NO  | VI.E  | 41    |
| 25.53(e)(1)(F)   | CYBERSECURITY ANNEX  | YES | VI.F  | 42-62 |
| 25.53(e)(1)(G)   | PHYSICAL SECURITY INCIDENT ANNEX   | YES | VI.G  | 63-68 |
| 25.53(e)(1)(H)   | A TRANSMISSION AND DISTRIBUTION UTILITY THAT LEASES OR OPERATES FACILITIES UNDER PURA §39.918(B)(1) OR PROCURES, OWNS, AND OPERATES FACILITIES UNDER PURA §39.918(B)(2) MUST INCLUDE AN ANNEX THAT DETAILS ITS PLAN FOR THE USE OF THOSE FACILITIES; AND | NO  | VI.H. | 69    |
| 25.53(e)(1)(I)   | ANY ADDITIONAL ANNEXES AS NEEDED OR APPROPRIATE TO THE ENTITY'S PARTICULAR CIRCUMSTANCES   | NO  |       |       |
| 25.53(e)(2)(A-H) | REQUIREMENTS FOR GENERATORS  | NO  | VII   | 70    |
| 25.53(e)(3)(A-E) | REQUIREMENTS FOR REPS  | NO  | VIII  | 71    |
| 25.53(e)(4)(A-F) | REQUIREMENTS FOR ERCOT   | NO  | IX    | 72    |

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Table 3. lists the titles and names of employees receiving access to and training on this Plan, including the date of access to or training.


*Table 3 Record of Distribution*

| <b>NAME</b>     | <b>TITLE</b>                              | <b>DATE OF ACCESS OR TRAINING</b> |
|-----------------|---|-----------------------------------|
| Kelly Lankford  | Executive Vice President/CEO              | 4/14/2022                         |
| David Watson    | Director of Office Services               | 4/14/2022                         |
| Nory Callaway   | Manager of Key Accounts                   | 4/14/2022                         |
| Isai Garcia     | Manager of Accounting & Finance           | 4/14/2022                         |
| Stacy Walter    | Manager of Member Services                | 4/14/2022                         |
| Lauren Trujillo | Manager of Administration/Human Resources | 4/14/2022                         |
| Dustin Brown    | Director of Engineering & Operations      | 4/14/2022                         |
| Jackie Wade     | Manager of Safety & Loss Control          | 4/14/2022                         |
| Jonathan Cutrer | Director of Information Technology        | 4/14/2022                         |
| Aaron Jenkins   | Manager of Engineering                    | 4/14/2022                         |
| Buster Matheny  | Line Superintendent                       | 4/14/2022                         |
| Krysha Burleson | PR Specialist                             | 4/14/2022                         |

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Table 4. lists the primary and backup emergency contacts for individuals who can address urgent requests and questions from the PUCT during an emergency.

*Table 4 Emergency Contacts*

| <b>NAME</b>     | <b>TITLE</b>                              | <b>RESPONSIBILITY</b>  | <b>CONTACT INFORMATION</b>   |
|-----------------|---|--|--|
| Kelly Lankford  | Executive VP/CEO                          | Principle administrator of the plan. Must review and approve all changes.                                      |  |
| Dustin Brown    | Director of Engineering & Operations      | Alternate administrator of the plan. Must review and approve all changes. Responsible for plan implementation. |  |
| David Watson    | Director of Office Services               | Subject Matter Expert and responsible for plan implementation.   |  |
| Jonathan Cutrer | Director of Information Technology        | Subject Matter Expert and responsible for plan implementation.   |  |
| Lauren Trujillo | Manager of Administration/Human Resources | Distributor of the plan. May recommend changes and edit if designated by Executive VP/CEO.                     |  |

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## AFFIDAVIT

STATE OF TEXAS                   §

COUNTY OF TOM GREEN       §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath that he or she is entitled to make this Affidavit, and that the statements contained below are based on personal knowledge and are true and correct.

I, Kelly Lankford, swear or affirm the following on behalf of Concho Valley Electric Cooperative, Inc. ("Cooperative"), an electric cooperative operating in the State of Texas:

- a. Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan ("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;
- b. The EOP has been reviewed and approved by the appropriate executives;
- c. Drills have been conducted to the extent required;
- d. The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- e. Cooperative maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- f. In accordance with the guidance received during the March 11, 2022, PUCT workshop, Cooperative is providing the Commission with its schedule for complying with 16 TAC §25.53(c)(4)(vi) related to National Incident Management System (NIMS) training. All Cooperative's Emergency Management personnel is tentatively scheduled to complete the required NIMS training by November 1, 2022.

[Signature]

(Signature of Officer of the Cooperative)

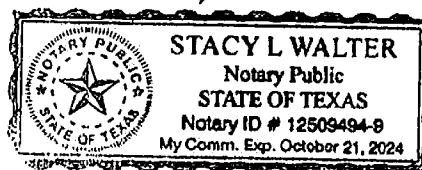
Sworn to and subscribed before me on this 14 day of April, 2022

Kelly Lankford

Notary Public in and for the State of Texas

[Signature]

Notary Seal





# **Emergency Operations Plan for**



**Concho Valley Electric Cooperative, Inc**

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## I. APPROVAL AND IMPLEMENTATION

### A. INTRODUCTION

Concho Valley Electric Cooperative ("CVEC") maintains this Emergency Operations Plan ("Plan") for use during emergencies, natural disasters or situations involving curtailments or major interruptions in electrical service in compliance with 16 Texas Administrative Code § 25.53 - Electric Service Emergency Operations Plan ("Rule").

This Plan will be reviewed, and an annual drill performed at least once annually if it has not been implemented in response to an actual event within that year. Following any implementation or annual review, CVEC shall assess the effectiveness of the Plan and modify it as needed. The official copy will be maintained at CVEC's headquarters located at 2530 Pulliam Street, San Angelo, Texas 76905, and a list of modifications is included in Part I.C. below.

### B. INDIVIDUALS RESPONSIBLE FOR PLAN

The individuals listed in Table 1 are responsible for maintaining and implementing the Plan and, if designated, have authority to change the Plan:

*Table 1 – Individuals Responsible for Plan*

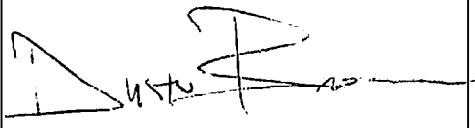
| <b>Name</b>    | <b>Title</b>                         | <b>Responsibility</b>  | <b>Authority to Change</b> |
|----------------|--------------------------------------|--|----------------------------|
| Kelly Lankford | Executive VP/CEO                     | Principle administrator of the plan. Must review and approve all changes.                                      | Yes                        |
| Dustin Brown   | Director of Engineering & Operations | Alternate administrator of the plan. Must review and approve all changes. Responsible for plan implementation. | Yes                        |
| David Watson   | Director of Office Services          | Subject Matter Expert and responsible for plan implementation.   | No                         |

|                 |   |  |     |
|-----------------|---|--|-----|
| Jonathan Cutrer | Director of Information Technology        | Subject Matter Expert and responsible for plan implementation.                             | No  |
| Lauren Trujillo | Manager of Administration/Human Resources | Distributor of the plan. May recommend changes and edit if designated by Executive VP/CEO. | Yes |

### **C. REVISION AND SUMMARY**

This Plan supersedes all previous versions of an Emergency Response Plan or an Emergency Operations Plan. Please refer to Table 2 for records of revision.

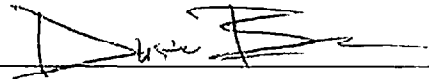
*Table 2 – Records of Revision*

| <b>Revision Date</b> | <b>Summary of Change</b>   | <b>Inserted by (name and signature)</b>   |
|----------------------|--|---|
| <b>3/29/2022</b>     | <b>Updated from existing Emergency Response Plan (ERP) to EOP to reflect requirements of 16 Texas Administrative Code § 25.53 - Electric Service Emergency Operations Plan. This EOP supersedes all previous ERPs.</b> | <b>Dustin Brown</b><br> |

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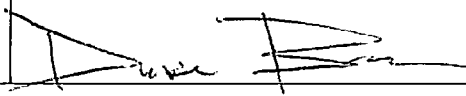
#### **D. ANNUAL REVIEW**

*Table 3 – Records of Plan Review*

| <b>Review Date</b> | <b>Year</b> | <b>Comments</b>          | <b>Inserted by (name and signature)</b>  |
|--------------------|-------------|--------------------------|--|
| Before 10/1/2022   | 2022        | Annual Review and Update | Dustin Brown<br> |

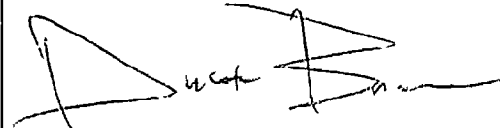
#### **E. DISTRIBUTION LOG**

*Table 4 – Records of Distribution Log*

| <b>Review Date</b> | <b>Year</b> | <b>Comments</b>                                      | <b>Inserted by (name and signature)</b>  |
|--------------------|-------------|--|--|
| Before 11/1/2022   | 2022        | Distribution to all employees and training over EOP. | Dustin Brown<br> |

#### **F. ACTIVATION OR ANNUAL DRILL LOG**

*Table 5 – Records of Activation or Annual Drill Log*

| <b>Review Date</b>   | <b>Year</b> | <b>Comments</b>                    | <b>Inserted by (name and signature)</b>  |
|--|-------------|------------------------------------|--|
| 1/15/2022<br>3/5/2022<br>3/14/2022<br>3/17/2022<br>3/20/2022<br>3/21/2022<br>3/26/2022<br>3/27/2022<br>3/29/2022<br>4/5/2022<br>4/10/2022<br>4/11/2022<br>4/12/2022<br>4/13/2022 | 2022        | Annex D – Wildfire Mitigation Plan | Dustin Brown<br> |

## **II. ORGANIZATIONAL AND PERSONNEL ASSIGNMENTS**

The following is not intended as an exhaustive list of all probable or potential responsibilities required in an emergency situation. It does, however, define the essential staffing positions and responsibilities necessary for the management and resolution of unplanned system outages and events. All duties can be assigned or re-assigned by the Executive VP/CEO or the Director of Engineering & Operations.

### **A. DIRECTOR OF ENGINEERING & OPERATIONS**

- Provides support to system operations by analyzing outage data and making recommendations for power restoration.
- Provides switching orders as needed for power restoration.
- Provides SCADA assistance as needed.
- Constantly monitors location and activity of all CVEC and contract personnel working on restoration efforts and ensures this information is available to the Line Superintendent and System Operator at all times.
- Oversees all Engineering, Operations, & Warehouse personnel.
- Keep appropriate regulatory bodies (municipal governments, Public Utility Commission of Texas ("PUCT"), environmental agencies, etc.) apprised of outage and restoration efforts as per statutory requirement.
- Keep Executive VP/CEO apprised of outage and restoration efforts.

### **B. ENGINEERING PERSONNEL**

- Ensures all communication links are functional, and notifies appropriate vendors of potential troubleshooting and repair requirements to two-way radios, SCADA links, etc.
- Ensure all permanent generators at the CVEC office and communications towers are maintained, fueled, and ready to run.
- Ensure all portable generators are operational and that any such devices used for communication purposes (backup power supply at CVEC radio towers) are fueled and ready to run.
- Provides support to Director of Engineering & Operations by analyzing outage data and making recommendations for power restoration as needed.
- Inventory damaged lines/equipment and coordinate with Warehouse to ensure necessary material for repair is available to crews.
- Log location of all damaged or leaking devices requiring environmental cleanup.
- All requests for re-designs, reports of oil leaks, etc., shall be reported through engineering to ensure a job can be drawn up to track the work.

### **C. WAREHOUSE PERSONNEL**

- Coordinate material needs directly to Texas Electric Cooperative ("TEC") and others as needed.
- Seek additional material from other material contacts and companies.
- Maintain fuel levels in underground storage tanks and coordinate fuel deliveries.

### **D. LINE SUPERINTENDENT**

- Determines the level of the emergency and has complete responsibility and authority for completing restoration in a timely and efficient manner.
- Full responsibility for coordinating restoration efforts of Level 3 outages. If he is unavailable, the Director of Engineering & Operations will fulfill these duties and assign duties as necessary.
- Ensures adequate staffing of Operations Center to provide for the following:
  - Communication and device control
  - Data gathering and analysis
  - Limiting personnel in the Operations Center to critical staff only
  - Critical staff for Level 3 outages will include:
    - ✓ Two system operators
    - ✓ Line Superintendent
    - ✓ Director of Engineering & Operations
    - ✓ Executive VP/CEO
    - ✓ Director of Office Services or Manager of Member Services (as needed)
    - ✓ PR Specialist (as needed)
    - ✓ Director of Information Technology or IT personnel (as needed)
    - ✓ Other personnel as requested by the Line Superintendent
- Determines proper course of action for the restoration of affected transmission and distribution systems.
- Determines the priority for restoration, switching and patrolling.
- Secures outside contractor assistance if necessary.
- Determines and executes relief schedules during extended service restoration.
- Monitors working time of service and construction personnel so that management can determine appropriate rotation and relief schedules, insuring safety and minimizing fatigue.
- Complete or arrange for repairs to fleet vehicles in a timely manner to reduce downtime.
- Direct strategic pre-placement of heavy equipment, dozers, etc.
- Provide periodic updates to PR Specialist.
- Coordinate the logistics and execution of the Emergency Operations Plan by maximizing the available crews, equipment, and material.
- Establish a crew rotation plan when restoration of the system is expected to exceed 16 hours.

- Meet (as necessary) with the Director of Engineering & Operations to assist in the development of restoration plans.
- Ensure outside personnel are guided by qualified CVEC employees.

#### **E. SYSTEM OPERATOR**

- Notifies appropriate personnel in the event of an outage.
- Coordinates and directs activities required to restore the transmission and distribution systems during an outage.
- Maintains control of radio traffic insuring communication access for all field personnel.
- Ensures strict adherence to lockout/tagout procedures.
- Ensures members on life-support list receive priority status.
- Provides central communication and status information updates to the Line Superintendent, Director of Engineering & Operations, and to the PR Specialist.
- Determines extent of service interruptions by member count and by area.
- Monitors SCADA, outage management and related information systems, and logs all events during the outage.
- Requests support for various information and communication systems as needed.

#### **F. PR SPECIALIST**

- Coordinate the member notification whether through social media, press releases, news outlets, push notifications, alerts on website and/or mobile app.
- Serve as liaison between the Line Superintendent, Director of Engineering & Operations, System Operator and the Member Service department.
- Serves as spokesperson for the CVEC during emergencies.
- Prepares timely news releases, social media updates and public service announcements (see Appendix A for emergency contacts),
- In the event of the PR Specialist's absence, these duties will be filled by the Manager of Member Services.
- Ensures the Member Service department is provided with periodic updates on the status of the outage, consistent with what is reported in the general media.

#### **G. DEPARTMENT MANAGERS AND STAFF**

- Maintain function of offices with reduced staff during normal business hours.
- Communicate with key account members.
- Coordinate and schedule Member Service Representatives to take outage calls, and ensure designated lead is always present to serve as liaison between system operations and other member service representatives.

- Coordinate the assignment of duties to other employees to ensure any additional needs of the membership, CVEC or the employees are addressed. Such duties may include:
  - Field inspection to assess damage.
  - Coordination and delivery of materials and meals to crews.
  - Ensure lodging is available for outside crews.
  - Guide out-of-town crews to the damaged areas.
  - Visit members that are on life-support systems if communication system is not working.
  - Transport employees to and from homes or from one crew location to another.

#### **H. MEMBER SERVICE DEPARTMENT**

- Provide trained and courteous personnel for answering member outage calls and verifying power restoration to members.
- Assist with the prioritizing of outage calls with regard to special needs or critical loads.
- Provide members with additional information with respect to anticipated outage time and the extent of the damage as supplied by press releases, et al from the PR Specialist.
- Confirm restoration of power by follow-up phone call.

#### **I. CONSTRUCTION, SERVICE, AND MAINTENANCE CREWS**

- Comply with all safety policies and procedures (e.g. lockout/tagout, grounding, etc.).
- Provides adequate personnel to patrol, repair, sectionalize and/or restore all damaged transmission and distribution systems.
- Coordinate material requirements with Warehouse.
- Periodically review and determine the best utilization of equipment and personnel.
- Request mechanic personnel for emergency equipment and vehicular repair as needed.

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### **III. COMMUNICATION PLAN**

#### **A. EMPLOYEE COMMUNICATIONS**

Communication with our employees is critical to relaying information such as where to report to work, if we need extra employees on duty, situational updates, etc. Communication tools available as needed include sending emails to CVEC employees allowing us to reach every full-time and part-time employee; updating Facebook and Twitter; texting; calling.

#### **B. OUTAGE REPORTING/CONSUMER COMPLAINTS**

Members may report outages with the following options:

1. By calling our office 24/7 at (325) 655-6957. Depending on the call volume, all calls may be routed to the automated system. The system works on caller ID technology or by entering an account number or meter number. If Member has none of that information, they can still leave a message.
2. CVEC mobile device app (Member must be registered). Within the app, Members can option in for notifications via text or email.
3. CVEC website – “contact us” will send an email to our office.
4. Social media sites, such as Facebook and Twitter.
5. Members can use the outage texting service by texting “OUT” to [REDACTED]

Member service representatives are called into the office to answer calls and process outage reports recorded by the automated system. They visit our Facebook page for updates and information to share with members. Member service representatives work continuously until the outage is restored or until the operations superintendent determines that such services are no longer necessary.

Police, fire and other emergency service organizations are provided with unpublished phone numbers for reaching the Operations Center directly.

Members can file complaints through the CVEC’s website “contact us” form located at <https://cvec.coop/about/contact-us>. Names of key staff are available on the website. Members can contact us privately or publicly through:

- <https://www.facebook.com/concho.valley.electric.cooperative> or
- <https://twitter.com/cvecelec> or
- dial the office directly at (325) 655-6957.

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## **C. PUBLIC COMMUNICATIONS**

Communication tools include Facebook and Twitter, along with the CVEC's website and press releases to TV, radio and newspaper outlets. Icons linking to CVEC's Facebook and Twitter pages are located in the top right corner of the CVEC website to connect the information sources. The PR Specialist is available for interviews as needed. We also have the ability to pull member lists for email and text communications.

## **D. COORDINATION WITH VISITING WORK CREWS**

Differences in radio frequencies combined with unfamiliarity with our transmission/distribution system make it imperative that all visiting work crews be accompanied by a qualified employee from the CVEC during their work activities.

## **E. CRITICAL LOADS**

The CVEC will attempt to notify critical loads either before or at the onset of an emergency by any of the following methods: phone, texting, email, radio, television, social media, CVEC's website, law enforcement officers, other important contacts and utility personnel in the field.

## **F. REGULATORY COMMUNICATIONS**

The Director of Engineering & Operations shall ensure the timely filing of reports in the event that a system failure or load loss meets the reporting threshold of state and federal regulatory bodies.

### **1. Procedure for Outage Reporting to DOE**

The Form OE-417 is the critical alert mechanism for informing DOE of electrical emergency incidents or disturbances that disrupt the operation of any critical infrastructure in the electric power industry.

Instructions for filing as well as a link to the on-line form are located at:

[REDACTED]

Form OE-417 must be submitted to the Operations Center if one of the following apply:

1. Physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations.
2. Reportable Cyber Security Incident.
3. Cyber event that causes interruptions of electrical system operations.

4. Complete operational failure or shut-down of the transmission and/or distribution electrical system.
5. Electrical system Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system.
6. Uncontrolled loss of 300 Megawatts (MW) or more of firm system loads for more than 15 minutes from a single incident
7. Load shedding of 100 MW or more implemented under emergency operational policy
8. System-wide voltage reductions of 3 percent or more.
9. Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric power system.

Initial reports are due within 60 minutes of the time of system disruption; however the DOE will permit telephone notification [REDACTED] if the incident or disturbance is having a critical impact on the operations. An initial report must still be filed as soon as possible. A follow-up report is due within 48 hours of the time of the system disruption.

Instructions and forms for reporting to both the PUCT and the Department of Energy ("DOE") are located in Appendix B.

## **2. Public Utility Commission of Texas (PUCT)**

Upon request by PUCT staff during an activation of the State Operations Center (SOC) by the Texas Department of Emergency Management (TDEM), the CVEC will provide updates 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 staff.

## **3. Office of Public Utility Counsel (OPUC)**

Upon request by OPUC during an activation of the SOC by the TDEM, the CVEC will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by Commission staff.

## **G. COMMUNICATIONS WITH RELIABILITY COORDINATOR**

CVEC's Transmission Operator managers communications with Reliability Coordinator. Please refer to Appendix A for the Transmission Operator's contact information.

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## **IV. EMERGENCY SUPPLIES & ASSISTANCE COORDINATION**

CVEC maintains a number of poles, conductors, associated hardware and other supplies readily available on site to restore power after an emergency.

Additionally, as described below CVEC has access to mutual aid in the event it needs access to additional supplies and work crews in an emergency.

Please refer to Appendix C: Emergency Supplies for a list of emergency supplies to be maintained at CVEC sites and Appendix D: Restoration Crew Supplies for a list of emergency supplies for restoration personnel.

### **A. SECURING ASSISTANCE FROM REGIONAL COOPERATIVES**

CVEC has a Memorandum of Understanding ("MOU") in place between 17 adjacent distribution cooperatives plus Golden Spread Electric CVEC ("GSEC") for emergencies that can be coordinated within the MOU participants.

During an emergency CVEC will survey the extent of damage and determine as nearly as possible the outside personnel and equipment needed. If MOU participants are not able to respond to needs, contact Texas Electric CVECs to secure additional assistance. Please refer to Appendix F for a description of the MOU.

National assistance may also be requested from [REDACTED]

### **B. SECURING EMERGENCY ASSISTANCE FROM TEC**

For larger widespread emergency events where multiple members of the MOU need assistance that cannot be obtained within the MOU participants, CVEC will request mutual aid assistance according to the plan developed by Texas Electric CVECs through their Loss Control & Safety Program. Please refer to Appendix G for a description of the mutual aid agreement.

CVEC will survey the extent of damage and determine as nearly as possible the outside personnel and equipment needed. CVEC staff will contact [REDACTED] and advise of needs.

When calling for assistance, give the following information:

- Nature of emergency
- Number and type of trucks needed
- Other equipment and tools needed

- Personnel and classification needed
- Materials needed
- Weather and road conditions
- Where the crews should report, and to whom
- How to contact your cooperative
- Name of person to receive this information
- Telephone numbers other than normal usage

To facilitate giving of above information over substandard communications media, or when the message must be relayed through persons unfamiliar with the terms, use the Form For Requesting Assistance (see Appendix E).

### **C. COMPLIANCE WITH COOPERATIVE SAFETY RULES AND POLICIES**

All CVEC personnel, contractors, cooperative crews providing mutual aid, etc. shall be required to comply with all safety rules and policies of the CVEC. Such rules and policies include, but are not limited to, all provisions of the CVEC's current safety handbook, APPA, OSHA 29CFR 1910.269, NESC, etc.

### **D. UNIFORM METHOD OF REIMBURSEMENT**

It is suggested that cooperatives requesting assistance will reimburse the providers of the assistance the provider's actual labor, equipment and materials costs. It is suggested that the rate of pay for labor is at least time-and-a-half for all hours worked.

Every reasonable precaution shall be used to determine whether an employee is mentally and physically qualified to follow safe work practices. The crew foreman of the cooperative providing the assistance will determine the total number of continuous work hours. It is also recommended that the current FEMA Cost Code listing be considered.

### **E. TEC ADDITIONAL COMMENTS**

1. The Texas Electric CVECs Loss Control Advisory Committee hereby recognizes the need to update and amend this manual, preferably on an annual basis. This document should certainly be reviewed shortly after a disaster event has occurred in the state, and which has affected any TEC member-system cooperative. Additional recommendations and suggestions will be added as necessary and will serve as additional attachments or amendments to this text.
2. It is further recommended that the TEC Loss Control Advisory Committee, along with the TEC Directors, review and update the TEC Mutual Aid Plan for the Electric CVECs of Texas on an annual basis. Such review should include: 1) an update of names, addresses and

phone numbers (to include emergency contact phone numbers) of all in-house contractors used by cooperatives in the state; 2) an updated listing of the current safety practices, rules, and regulations as adopted by the TEC Safety and Loss Control Advisory Committee and the TEC Board of Directors, including any amendments thereto; 3) an annual study of wages paid to assisting cooperative personnel, to include an analysis of wages paid to assisting line crews from other surrounding states; and, 4) a review of billing rates for equipment and vehicles used during emergency restoration services and in subsequent permanent repair efforts during the days and weeks following a declared disaster.

3. It is strongly recommended that an inventory of materials be commenced by the assisting cooperative for all vehicles and equipment to be used during the emergency restoration period, and that such an inventory be conducted before vehicles are sent to an affected cooperative, and after work has been completed.
4. The assisted cooperative may either return the borrowed materials OR reimburse the assisting cooperative for materials replacement.
5. TEC should appoint a designated person from its staff to serve as an official liaison to both Texas Emergency Management (TEM) and the Federal Emergency Management Agency (FEMA).
6. Such liaison should work with officials from TEM and FEMA before, during, and after all declared disasters within the state of Texas. Additionally, said TEC liaison should stress the importance of applicable Codes and Standards that all Texas electric cooperatives are required by law to abide by and to apply such Codes and Standards during the Emergency Protective Measures period and during permanent repair efforts.
7. The Committee hereby recommends that TEM officials be trained in the knowledge of applicable electric Codes and Standards, (specifically the current version of the National Electrical Safety Code (NESC).
8. The Committee further recommends that FEMA auditors be consistent in both personnel and their findings among audited cooperatives.
9. The Committee suggests that TEC contract with, or arrange for, TEM officials to conduct an annual training seminar for cooperative personnel on disaster-related topics, including but not limited to: Public Assistance, Response and Recovery, Disaster-related Mitigation, and Hazard Mitigation.
10. Finally, the Committee recommends that, within 60 to 90 days following a disaster-related event, an in-depth analysis of the response and recovery effort by affected cooperatives be conducted in order to make necessary improvements, changes or corrections to the TEC Mutual Aid Plan and to this disaster response and recovery guidebook. Mutual Aid Agreement Participants (Texas Only).

## **F. MANAGEMENT ISSUES**

1. Mutual Aid Agreements between cooperatives and/or other organizations should be reviewed annually. Such agreements should specify the type of assistance each participant shall provide, and at what cost. The Mutual Aid Agreement should stipulate

that the “helping partner,” the participant responding to a request for help from the affected system, shall bill all costs at their normal rates; any “adders” should be specified and detailed in the agreement.

2. “Projects of Work,” or “PWs,” should specify verifiable quantities of work to be done whenever possible. CVEC personnel must be prepared to explain cost over-runs or reasons for higher costs than were estimated in the original PW. Each state’s Emergency Management Agency should be contacted immediately if an over-run is anticipated. Such constant tracking of a PW’s progress may necessitate the use of a full-time accounting manager or project accountant for FEMA-related work. Such assignment would be added to the cooperative’s “Administrative Costs” for the project.
3. Consider the assignment or designation of someone to be the cooperative Project Officer throughout the course of the disaster response and recovery. Such person could be from within the cooperative, or on loan from another system outside the disaster area. The Project Officer’s duties could include the following:
  - a. Assistance in evaluating and estimating the extent of damage to the cooperative’s system;
  - b. Assistance in securing available contractors and bid lists once the 70-hour Emergency Protective Measures period has passed;
  - c. Coordinating with all other cooperative departments, including but not limited to management, accounting, engineering, operations, purchasing, and warehouse operations, to ensure an orderly assessment of needs by each department, and assistance in helping individual departments meet necessary requirements during the disaster response and recovery process. Such requirements would include ensuring environmental compliance via contacts with each state’s Department of Environmental Quality (DEQ), One-call digging notification, State Historic Preservation offices and each state’s Archeological Survey notification, as well as each state’s Floodplain Administrator office notification.
  - d. The CVEC Project Officer could also coordinate the establishment of temporary storage areas for debris, and assist in dispensing state emergency management Environmental Release Forms and Historic Site Preservation Forms to individuals or groups who contact the cooperative regarding the re-use of damaged or destroyed wood poles)
  - e. Other duties possibly assigned to the CVEC Project Officer would be the evaluation of material acquisition, material dispensation, compilation of staking sheets during both the Emergency Protective Measures period and the Utilities (permanent repairs) period, and ensuring that all required maps, invoices, time sheets, and other paperwork documentation relevant to the specified disaster be collected and retained in an orderly fashion for future review by FEMA and OIG.
4. Send personnel from the accounting, operations, and engineering departments to the Reapplicant Briefing meetings and sign up for assistance as soon as possible. To the best

- of your ability, make sure original estimates of damage are thorough and comprehensive. Underestimating disaster damages could create additional PWs or delay reimbursements.
5. Management may wish to implement a policy that designates key employees and supervisors be available 24-hours per day, 7 days per week during the disaster, with work schedules to be determined by department heads in conjunction with the manager/CEO.
  6. Communications, marketing, and/or public relations personnel may be utilized or designated to deliver material, equipment, and/or food (meals) to crews in the field, depending upon the personnel's knowledge of the distribution system and their certification on equipment or in materials handling.
  7. As soon as possible, preferably during the first 70 hours of the disaster (FEMA's usual definition of Category B, Emergency Protective Measures), contact in-house contractors and those whose bids have been accepted and determine the length of time the contractors' emergency rates are to be in effect. Do not accept a contractor's argument that FEMA will automatically pay for extended work periods utilizing emergency rates. Also, unless other arrangements are made, advise contractors that after the initial 70-hour Emergency Protective Measures period, meals and lodging will no longer be paid for by the cooperative, but should be arranged and paid for by the contractor, with copies of meal and hotel receipts to be attached to weekly invoices supplied to the cooperative. Said meal and hotel tickets should list the names of crew members and corresponding room numbers at hotels to account for appropriate meal and lodging expenses. (Reference current IRS per diem guidelines.)
  8. It is strongly recommended that additional engineering resources be arranged to assist in the daily development of staking sheets, material sheets, and work order information. This will allow the staking department to stay ahead of construction crews and provide for a more orderly flow of necessary and vital information to other key departments.
  9. The engineering department should begin solicitation of at least three (3) bids from contractors as soon as possible, even before the full extent of damage to the system has been determined. Both FEMA and the OIG require that bids be procured for all permanent restoration work to be done by contractors. Make sure that any 'verbal contracts' are converted to written agreements to be shown to auditors.
  10. Whenever it appears that consumers may be without electric power for several days or weeks, consider hiring security guards to be in place at office headquarters and warehouse facilities. This generally eliminates the possibility of hostile issues with consumers and sends a message that personnel, material, and equipment are being safeguarded. Once the cooperative nears completion of its service restoration efforts to residential members, the security arrangement may then be terminated.
  11. It is not uncommon for employees to retire, quit, or ask for re-assignment during or following a disaster. Carefully evaluate the need for cooperative linemen to work at night; their most effective work and/or leadership will most likely be during daylight hours, when damage to the system is clearly visible and when they have been adequately rested.

12. Document the first day of the outage and the day the last consumer's service was restored. This may impact various FEMA Categories A through F on your cooperative's Force Account Labor statistics.
13. Have an Organization Chart of all cooperative employees, indicating what area or department they worked in before and during the disaster. This will help resolve questions about force account labor when it is classified into Categories A, Debris Removal; B, Emergency Protective Measures; and F, Utilities (Permanent Repairs).
14. Consider the development of a Rest and Recuperation Policy (R & R) for employees. Such policy should be designed for the safety and well-being of the cooperative's employees, and for the general public. The policy should be developed by management, and approved/adopted by the cooperative's board. If such a policy is enacted during the disaster, the date and time should be noted in the form of a written memorandum.
15. Insurance claims filed with FEMA should have a disclaimer from the cooperative's insurance carrier. Have copies of all insurance policies available for inspection by state emergency management, FEMA, and OIG personnel.
16. Insist that daily time sheet entries be made by all personnel, listing hours worked, names of crew members, and location work was performed; document, with narrative descriptions, any work performed by office personnel if it is related to field work, i.e., delivery of meals or materials and equipment, warehouse work, etc.
17. Management should be prepared to explain the process that the cooperative used to select work crews, whether such crews were from other cooperatives or were contract crews. Explanation of the cooperative's action plan and methodology used in selecting various contractors may be necessary, including lists of equipment needed and rationale used to determine which contractors and crews would be utilized.
18. Send groups of employees to state emergency management agency and FEMA training; this denotes the cooperative's dedication to being properly prepared.

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## **V. IDENTIFICATION OF WEATHER-RELATED HAZARDS**

CVEC operations personnel will monitor weather conditions, county emergency management alerts and applicable state agency advisories regarding severe weather events and conditions. The Director of Engineering & Operations and/or the Line Superintendent will also participate in applicable State Operations Center (SOC) and Texas Energy Reliability Council (TERC) calls prior to and during weather and wildfire events. CVEC's wildfire plan is addressed in greater detail in Section VI.D.

The following stages describe the various levels of preparedness in advance of, or during an outage situation.

### **A. PRE-STORM WATCH**

This is a precautionary level preceding the arrival of an anticipated severe weather event. This level would be activated following a severe weather forecast. The System Operator will monitor the situation and advise the Line Superintendent.

- Expected outage time: None
- Scope of outage: No members out of service
- Initiated by: Director of Engineering & Operations or Line Superintendent

### **B. LEVEL 1**

Service likely to be restored in less than four hours. Typically handled by on-call line personnel, however System Operator or Line Superintendent on-call may direct other personnel to assist as needed.

- Expected outage time: Less than 4 hours
- Scope of outage: Less than 100 members
- Initiated by: Director of Engineering & Operations or Line Superintendent

### **C. LEVEL 2**

Service likely to be restored in less than 12 hours without the assistance of outside crews. All construction, operations and service personnel to report.

- Expected outage time: 4 to 12 hours
- Scope of outage: Entire substation or major feeder
- Initiated by: Director of Engineering & Operations or Line Superintendent

#### **D. LEVEL 3**

Requires outside help to restore service. All CVEC employees must report.

- Expected outage time: More than 12 hours
- Scope of outage: Widespread damage to system
- Initiated by: Director of Engineering & Operations or Executive VP/CEO
- Line Superintendent to have full responsibility for coordinating restoration activities

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## VI. ANNEXES

Concho Valley Electric Cooperative maintains the annexes designated below, which are attached and incorporated into the Plan:

*Table 6 – Records of Annexes*

| Annex | Title                            | Included | Explanation, if not included  |
|-------|----------------------------------|----------|---|
| A     | Weather Emergencies              | Yes      |   |
| B     | Load Shed                        | Yes      |   |
| C     | Pandemic and Epidemic            | Yes      |   |
| D     | Wildfires                        | Yes      |   |
| E     | Hurricanes                       | No       | Not applicable. CVEC service territory is not located near or within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management. |
| F     | Cybersecurity                    | Yes      |   |
| G     | Physical Security                | Yes      |   |
| H     | TDU Requirements                 | No       | Not Applicable. CVEC is not a Transmission and Distribution Utility as defined in 16 TAC §25.5  |
| I     | Additional annexes               | No       | No additional annexes needed  |
| XXX   | [Confidential Portions of -----] |          |   |

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## **A. ANNEX A – WEATHER EMERGENCIES**

Please refer to Section II: Organizational and Personnel Assignments for a description of personnel duties during an emergency, and Section V: Identification of Weather-Related Hazards for CVEC's process for identifying weather related hazards.

Please also refer to the following procedures:

- Appendix C: Emergency Office Supplies provides a list of emergency supplies maintained at CVEC sites.
- Appendix: D: Restoration Personnel Supplies provides a list of emergency supplies maintained on-site for restoration crews.
- Appendix H: Engineering and Operations provides engineering and operations emergency.
- Appendix I: CVEC Facilities for instructions regarding weather experienced at the facility.

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## **B. ANNEX B: LOAD SHED**

### **1. Procedures for Controlled Load Shed**

GSEC Operations Center receives Load Shed Instructions from ERCOT. GSEC's Operations Center performs a calculation to allocate the load shed requirement for CVEC and communicates that instruction via voice communication.

Upon notification of curtailment and the target kW to be shed, CVEC personnel will begin opening feeder circuit breakers via SCADA (or via field personnel in the substation) as outlined in the cooperative's Manual Load Shed and Under Frequency Load Shed Plan until the target kW is shed.

Once the target kW is shed, CVEC will notify GSEC's Operations Center via voice communication that the allocated load has been shed.

Depending on the duration of the curtailment, it is planned to rotate load that has been shed among the substations and circuits on a 0.25 (15) hour(minute) basis. This is to spread the outages as evenly among the Members as possible and minimize the inconvenience associated with the outage.

All load shed Instructions will be executed as soon as possible and without delay.

CVEC uses discretion in prioritization of selecting load shed feeders by giving highest priority to critical natural gas facilities to remain in service taking into consideration the guidance provided by PUCT (please refer to Appendix I), with other critical loads given lower priority to remain in service. Even though CVEC's plan attempts to prioritize critical natural gas facilities and other critical loads from manual load shed, designation as a critical natural gas facility or other critical load does not guarantee the uninterrupted supply of electricity.

CVEC uses the following guide to curtail power to the categories listed below in sequential order:

1. All Loads Other Than Qualifying Critical Load Facilities
2. Qualifying Critical Load Facilities

### **2. Priorities for Restoring Shed Load**

GSEC's Operations Center receives Instructions from ERCOT that load can be restored. GSEC's Operations Center performs a calculation to allocate how much load can be restored for CVEC and communicates that Instruction via voice communication.

Upon notification of load restoration and the target kW to be restored, CVEC personnel will begin closing feeder circuit breakers via SCADA (or via field personnel in the substation) until the target kW is restored.

Once the target kW is restored, CVEC will notify GSEC's Operations Center via voice communication the amount of load that has been restored.

If any critical natural gas facilities or other critical loads were curtailed in Section I., they will be given higher priority for service restoration in the reverse order listed in Section I. above.

In addition to the priorities concerning community health and safety, CVEC will assign crews to specific areas. Generally, the crews will concentrate on a given line section in order to restore power to as many members as possible. Restoration will be done systematically, with the best interest of all affected members in mind. However, one or more crews may be assigned to locations where special hazards exist or where especially critical loads require immediate attention. When not specifically assigned, these crews will be used to repair individual services.

### **3. Confidential Registry of Critical Load and Critical Care Customers**

CVEC maintains a registry of both critical care and critical load members; however, it is the responsibility of the member to inform CVEC of special medical needs. CVEC attempts to identify such members by asking at the time of establishing a new account whether any person residing at this new account location requires an electric-powered medical device to sustain life. Further, CVEC publishes reminders in the Texas Co-op Power magazine, newsletters and/or notices included with bills that CVEC needs to be informed of any special needs.

No less than once a year, CVEC also provides via either bill message and/or Texas Co-op Power magazine (1) load shed information that addresses the procedures for implementing voluntary load shedding; the types of Member consumers who may be considered critical load or critical care and the application process to be designated as such; and (2) information about reducing electricity use at times when involuntary load shedding events may be implemented.

The registry is confidential and is accessible through the billing software system or the outage management software at all times for use by operations personnel. The list identifies each member by location number and is cross-referenced on outage reports. The registry is updated continuously, as necessary.

Methods to communicate with these members during emergencies when telephone service is not available include working through local law enforcement officers and emergency medical personnel in the field. Where possible, field visits by CVEC personnel may also be used.

### **4. Rotating Outages**

CVEC will attempt to inform members in advance of planned outages, however, during emergencies, outages may need to be rotated to maintain system integrity.

NOTE: Because the curtailment and shedding load is dependent on several factors (most significantly, the amount of load that needs to be curtailed), the Director of Engineering &

Operations or Line Superintendent may have discretion in determining where load shedding will best serve the interest of the cooperative.

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## **C. ANNEX C: PANDEMIC PREPAREDNESS PLAN**

### **1. Objectives of the Plan**

To prepare the CVEC for the possibility of a pandemic by:

1. Educating employees about a possible pandemic event and the potential impacts on the CVECs' business operations;
2. Implementing reasonable measures to mitigate the impact of a pandemic on the CVEC and its employees;
3. Developing plans and policies for responding to a pandemic; and
4. Promoting employee wellness and minimizing opportunities for employees to be exposed to the disease while at the CVEC.

### **2. Background**

A pandemic is a global disease outbreak occurring when a virus emerges for which people have little or no immunity. The disease typically affects a significant portion of the global population.

It is difficult to predict when the next pandemic will occur or how severe it will be. Wherever and whenever a pandemic starts, everyone around the world is at risk. Countries might, through measures such as border closures and travel restrictions, delay arrival of the virus, but cannot stop it.

### **3. Levels of Response**

Because the nature of a pandemic cannot be determined in advance, this plan addresses the threat with three general levels of response: **Awareness**, **Epidemic** and **Pandemic**. These levels are defined as follows:

#### **A. LEVEL 1 – AWARENESS (SEASONAL)**

- The virus is reported affecting 5-10% of the population within the State of Texas.

#### **B. LEVEL 2 – EPIDEMIC (PREPARATION)**

- A widespread outbreak affecting 10-20% of the population. An epidemic may be declared by the Centers for Disease Control (CDC) or the Texas Health and Human Services Commission (HHSC).

### **C. LEVEL 3 – PANDEMIC (IMPLEMENTATION)**

- A widespread outbreak affecting 20+% of the population. A pandemic may be declared by the CDC and/or the World Health Organization (WHO).

## **4. Preparation & Response Efforts**

### **A. EMPLOYEE EDUCATION**

Employees will be educated about the virus, how it spreads and how CVEC is responding.

Numerous educational resources are available from the WHO and the CDC. Broadcast e-mail, texts, and employee informational monitors may be used to convey this information to employees.

Existing communication tools and communications plans would be used to educate and communicate pandemic-related messages to employees.

*Table 7 – Education Levels of Pandemic*

|                |   |
|----------------|---|
| <b>Level 1</b> | <ul style="list-style-type: none"><li>▪ How to avoid the virus</li><li>▪ Preventing the spread of the virus</li><li>▪ Symptoms of virus</li><li>▪ Do not report to work if sick or if you test positive for the virus</li></ul> |
| <b>Level 2</b> | <ul style="list-style-type: none"><li>▪ Limit face-to-face meetings</li><li>▪ Limit travel to affected areas</li><li>▪ Communicate changes in policy and/or practices</li></ul>   |
| <b>Level 3</b> | <ul style="list-style-type: none"><li>▪ Suspend face-to-face meetings</li><li>▪ Suspend non-critical business travel</li></ul>  |

### **B. FLU SHOTS**

Employees will be encouraged – and given an opportunity – to receive the flu vaccine.

### **C. SANITARY PRACTICES**

Supplies to maintain a sanitary environment will be kept on hand and deployed, as necessary, including:

1. Hand Sanitizer
2. Disinfectant Spray
3. Rubber Gloves

#### 4. Masks

*Table 8 – Sanitary Levels of Pandemic*

|                |  |
|----------------|--|
| <b>Level 1</b> | <ul style="list-style-type: none"><li>▪ Alcohol-based hand sanitizer in all areas (restrooms, break rooms, conference rooms, and at all meetings where food and drink are served)</li><li>▪ Facial tissues (e.g. Kleenex) in all meeting rooms and break rooms</li><li>▪ Brief cleaning crews on disinfecting techniques</li></ul> |
| <b>Level 2</b> | <ul style="list-style-type: none"><li>▪ No additional measures unless directed by the CDC or Texas HHSC</li></ul>  |
| <b>Level 3</b> | <ul style="list-style-type: none"><li>▪ No additional measures unless directed by the CDC or Texas HHSC</li></ul>  |

#### 5. Policy Modification/Development

Policies related to sick leave will be reviewed with possible impacts from a pandemic in mind. The following issues will be among those considered:

1. A possible relaxing of Paid Time Off (PTO) policy during a Level 2 or 3.
2. The possibility of mandatory leave for employees with symptoms of illness
3. A set of return-to-work guidelines to prevent employees from returning while still contagious
4. Some guidance on the handling of missed time for employees that do not wish to come to work for fear of exposure
5. Guidelines to identify positions that would qualify for work-from-home (WFH)
6. Identification, by department, of potential WFH employees

*Table 9 – Policy Modification Levels of Pandemic*

|                |   |
|----------------|---|
| <b>Level 1</b> | <ul style="list-style-type: none"><li>▪ Normal leave policies</li></ul>   |
| <b>Level 2</b> | <ul style="list-style-type: none"><li>▪ WFH permitted (with supervisor approval)</li></ul>  |
| <b>Level 3</b> | <ul style="list-style-type: none"><li>▪ WFH encouraged (with supervisor approval)</li><li>▪ Relaxation of PTO and other relevant policies</li></ul> |

#### 6. Business Continuity

Managers will be asked to re-examine their critical functions at a Level 1 situation. Specifically:

1. Are employees within the department cross-trained in job functions related to critical processes?
2. Could the department continue to perform its critical processes with a 40-50% employee absentee rate?
3. Which of those employees are equipped to work from home (home

computer, Internet access, VPN, etc.)?

The IT Department will develop plans for a wide deployment of software and services during a Level 1 situation to support a large number of WFH employees. IT will also provide instruction on the use of the CVEC e-mail system and other necessary programs and services from a remote location.

## 7. Coordination/Monitoring

CVEC's Manager of Human Resources will monitor information from the CDC and Texas HHSC for notification of activity. This should provide adequate lead time to prepare for arrival of the pandemic.

A significant increase in the level of contagious disease activity would be reported to the Executive VP/CEO and executive staff, who would then be responsible for determining if specific action related to the activation of a Level 2 or Level 3 response is required.

## 8. Protocols

Table 10 – Coordination Protocol Levels of Pandemic

| <b><u>PTO</u></b>             |   |
|-------------------------------|---|
| <b>Level 1</b>                | <ul style="list-style-type: none"><li>▪ Employees should not report for work if they show symptoms or test positive for the virus, Supervisors encouraged to send sick individuals home</li><li>▪ Employees should not report for work if a family member within the same household shows symptoms or tests positive</li><li>▪ Employees should not return to work from an illness-related absence until they have met the CDC isolation guidelines</li></ul> |
| <b>Level 2</b>                | ▪ No changes  |
| <b>Level 3</b>                | ▪ Consider modifications to PTO and other relevant policies   |
| <b><u>Business Travel</u></b> |   |
| <b>Level 1</b>                | ▪ No changes  |
| <b>Level 2</b>                | ▪ Employees should be cautioned concerning travel   |
| <b>Level 3</b>                | ▪ Non-critical business travel suspended  |
| <b><u>Meetings</u></b>        |   |
| <b>Level 1</b>                | ▪ No changes  |
| <b>Level 2</b>                | ▪ Face-to-face meetings should be minimized   |
| <b>Level 3</b>                | ▪ Face-to-face meetings suspended   |

| <b><u>Work from Home</u></b>   |   |
|--|---|
| <b>Level 1</b>   | ▪ No changes  |
| <b>Level 2</b>   | ▪ Employees approved for WFH would be allowed to do so    |
| <b>Level 3</b>   | ▪ Employees approved for WFH would be encouraged to do so |
| <b><u>Preparation</u></b>  |   |
| <ul style="list-style-type: none"> <li>• Identify potential WFH employees <ul style="list-style-type: none"> <li>• Job function can be performed remotely</li> <li>• Employee has Internet access at home</li> <li>• Employee has a company-issued laptop</li> </ul> </li> </ul> |   |
| • Train WFH employees on remote access to e-mail   |   |
| • Install VPN software and train employees in its use  |   |
| • Cross-train employees on critical business processes   |   |
| • Update restoration plans to address potential for 50% absenteeism  |   |

*Table 11 – Duty Levels of Pandemic*

| <b>When</b> | <b>Who</b>                 | <b>What</b>   |
|-------------|----------------------------|---|
| Level 1     | Manager of Human Resources | ▪ Initiate review of pandemic plan and recommend changes, as needed   |
| Level 1     | Executive Staff            | <ul style="list-style-type: none"> <li>▪ Develop and consider communications plan to educate employees about pandemic preparation efforts</li> <li>▪ Identify critical business process plans</li> <li>▪ Assess the need to purchase food or water</li> </ul>   |
| Level 1     | Manager of Human Resources | <ul style="list-style-type: none"> <li>▪ Prepare information to distribute to employees as information becomes available and any changes to policies necessary to ensure employee safety on pandemic plan</li> <li>▪ Discuss with Executive VP/CEO the possible implementation of the medical screening process as recommended for employees</li> <li>▪ Distribute information sheets to all employees noting their status as essential personnel.</li> </ul> |

|              |                                   |   |
|--------------|-----------------------------------|---|
| Level 1      | Information Technology Department | <ul style="list-style-type: none"> <li>▣ Review configuration of remote access system and communicate any changes to employees</li> <li>▣ Provide remote access training for potential WFH employees</li> </ul>   |
| Level 1      | Director of Office Services       | <ul style="list-style-type: none"> <li>▣ Stock all restrooms and meeting rooms with hand sanitizer, and disinfectant spray</li> <li>▣ Medical Door screening for contractors or any persons that will be conducting business at a local office will be conducted</li> <li>▣ Contact cleaning crew to discuss the possibility of schedule changes to cleaning and any necessary additions or changes to cleaning procedures. Prepare contact information for virus cleanup in the event it becomes necessary. This will be based on recommendations by the CDC or Texas HHSC.</li> <li>▣ Work with Public Relations Specialist prepare signs in the event of building closed to public.</li> </ul> |
| Level 2 or 3 | Executive VP/CEO                  | <ul style="list-style-type: none"> <li>▣ Situational review with staff</li> <li>▣ If recommended by the CDC or Texas HHSC, medical screening of employees and/or public will be implemented to reduce potential exposure to infected individuals</li> </ul>   |
| Level 2 or 3 | Public Relations Specialist       | <ul style="list-style-type: none"> <li>▣ Will notify members of cooperative building closure to the public or safety precautions needed by means of social media, Coop Power Magazine, and any other necessary</li> </ul>   |

|              |                                   |  |
|--------------|-----------------------------------|--|
|              |                                   | <p>communication devices</p> <ul style="list-style-type: none"> <li>▫ Work with Director of Office services to prepare signs in the event of building closed to public.</li> </ul> |
| Level 2 or 3 | Information Technology Department | <ul style="list-style-type: none"> <li>▫ Provide remote access for WFH employees</li> </ul>  |
| Level 2 or 3 | Department Directors              | <ul style="list-style-type: none"> <li>▫ Will communicate with employees and contractors regarding the potential pandemic preparation efforts.</li> </ul>                          |

## 9. Office Operations

If a pandemic occurs all office operations will continue until it is determined that employees are at risk. Public access to the property may be denied pursuant to a determination by the Executive VP/CEO.

The Executive VP/CEO shall determine what alternatives will be carried out for essential business operations. Possible scenarios include:

### A. MEMBER SERVICES REPRESENTATIVE

1. Employee will be required to wear proper PPE.
2. No public access to facility.
3. Accepting applications/ payments for service via electronic transmittance.
4. Employee may work from home.

### B. OTHER OFFICE EMPLOYEES

1. Employee will be required to wear proper PPE.
2. Employee may work from home.

## 10. Field Operations

If a pandemic occurs all field operations will continue until it is determined that

employees are at risk. The Executive VP/CEO may limit or prohibit public access to CVEC property.

The Executive VP/CEO and executive staff will determine what alternatives will be carried out for essential business operations, however possible. Possible scenarios include:

1. Limited one-on-one exposure to members and public.
2. Use of PPE.
3. Employee may work from vehicle and/or home (where job duties allow).
4. Crews will stagger works times to limit the employee's potential exposure.

## **11. Contractor Operations**

If a pandemic occurs all contractor operations will continue until the Executive VP/CEO and executive staff determines otherwise. The Director of Operations & Engineering will communicate as necessary with the contractor.

## **12. Forms and Future Action Plans**

Any forms and/or department action plans such as employees identified as critical and/or able to work from home will be attached to this plan as they become available.

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## **D. ANNEX D – WILDFIRE MITIGATION PLAN**

### **1. Purpose**

The intent of this plan is to outline the wildfire mitigation efforts of CVEC related to its overhead electrical distribution lines and associated equipment throughout its service territory.

### **2. Plan**

CVEC Engineering & Operations personnel will monitor weather conditions, county emergency management alerts and applicable state agency advisories regarding drought conditions and Red Flag warnings. Such sources include:

- Texas A&M Forest ([www.texaswildfirerisk.com](http://www.texaswildfirerisk.com))
- Texas Forest Service (fire index ratings)
- USFS fire danger class
- NWS Red Flag warnings

When conditions warrant (or when relevant advisories are issued), CVEC may require the entire distribution system to be placed in Fire Mode. Fire Mode is the process of placing every circuit on the most sensitive protection setting to ensure the ability to sustain an arc is null by opening the circuit in under 12 cycles.

When conditions warrant (or when relevant advisories are issued), CVEC will require a visual inspection of any line in its service territory that has been de-energized by protective relaying prior to re-energizing.

The Director of Engineering & Operations or the Line Superintendent shall authorize CVEC to enter into Fire Mode when necessary. The Executive VP/CEO may also authorize as needed.

The following is a list of CVEC stations with circuits located in areas susceptible to wildfires; responding local fire departments are also listed.

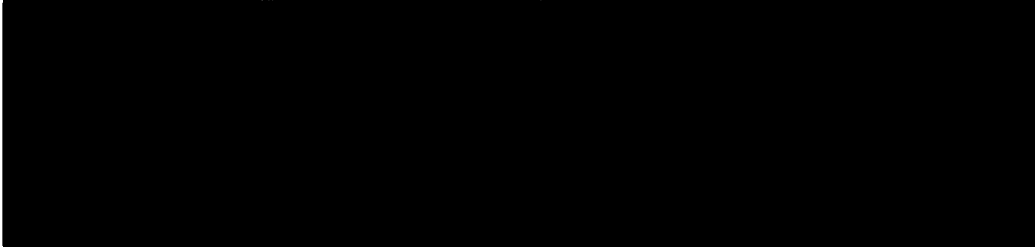
*Table 12 – Responding Fire Department by Substation Area*

| <b>Substation</b> | <b>Wildfire Potential</b> | <b>Responding Fire Department</b> |
|-------------------|---------------------------|-----------------------------------|
|                   |                           |                                   |



The following is a list of CVEC metering points with circuits located in areas susceptible to wildfires; responding local fire departments are also listed.

*Table 13 – Responding Fire Department by Metering Point Area*

| Metering Point   | Wildfire Potential | Responding Fire Department |
|--|--------------------|----------------------------|
|  |                    |                            |

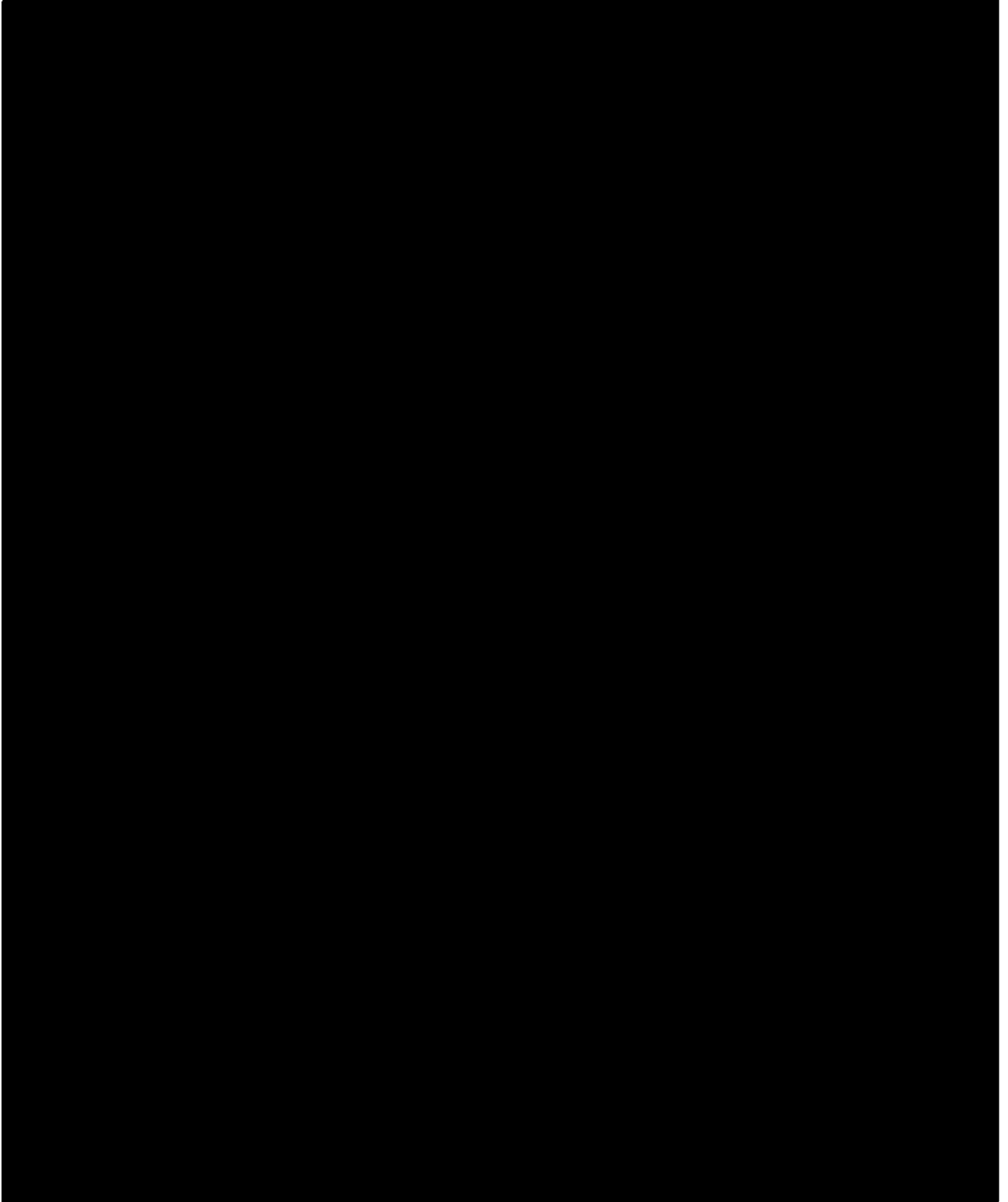
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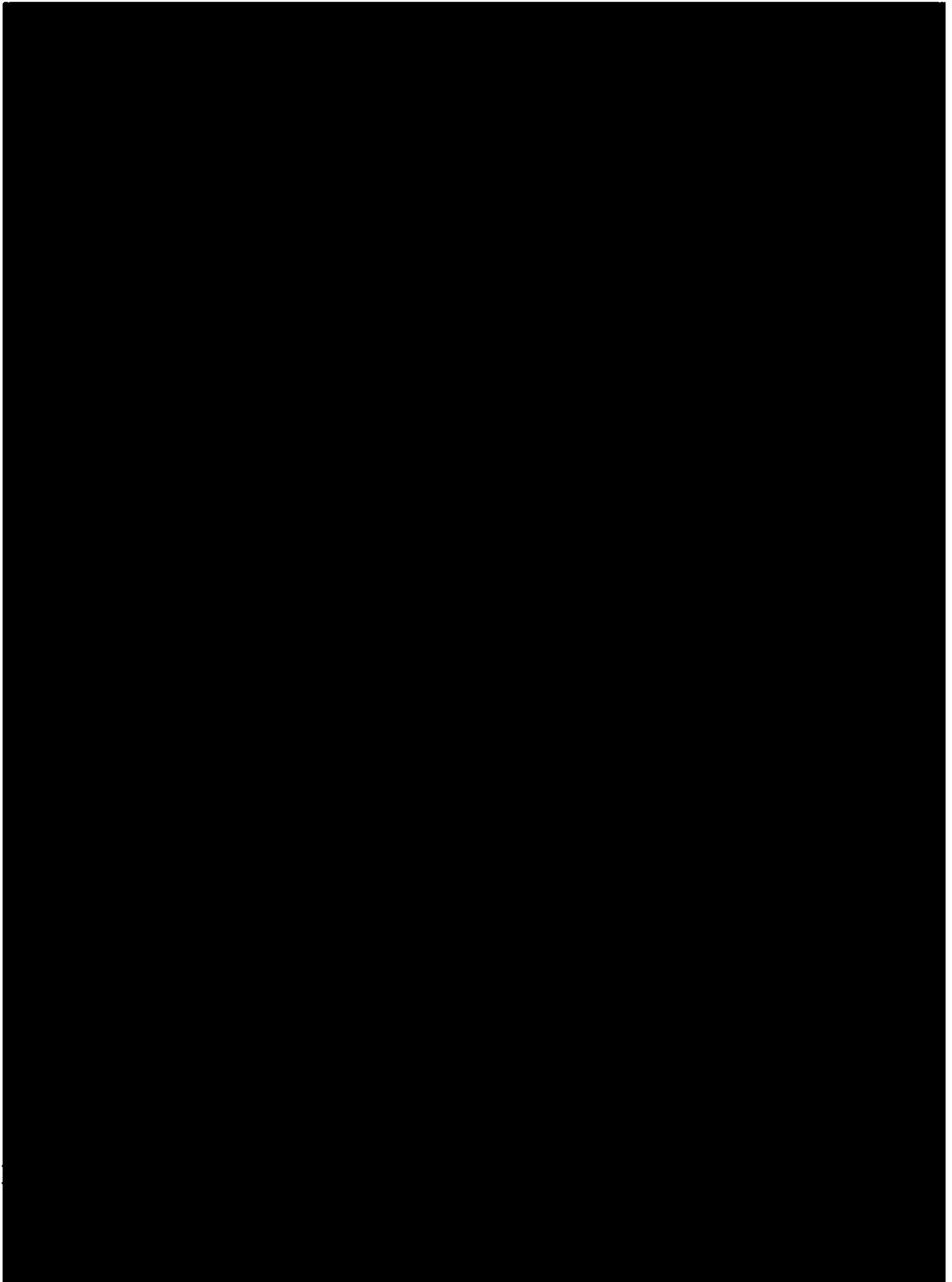
## **E. ANNEX E – HURRICANES**

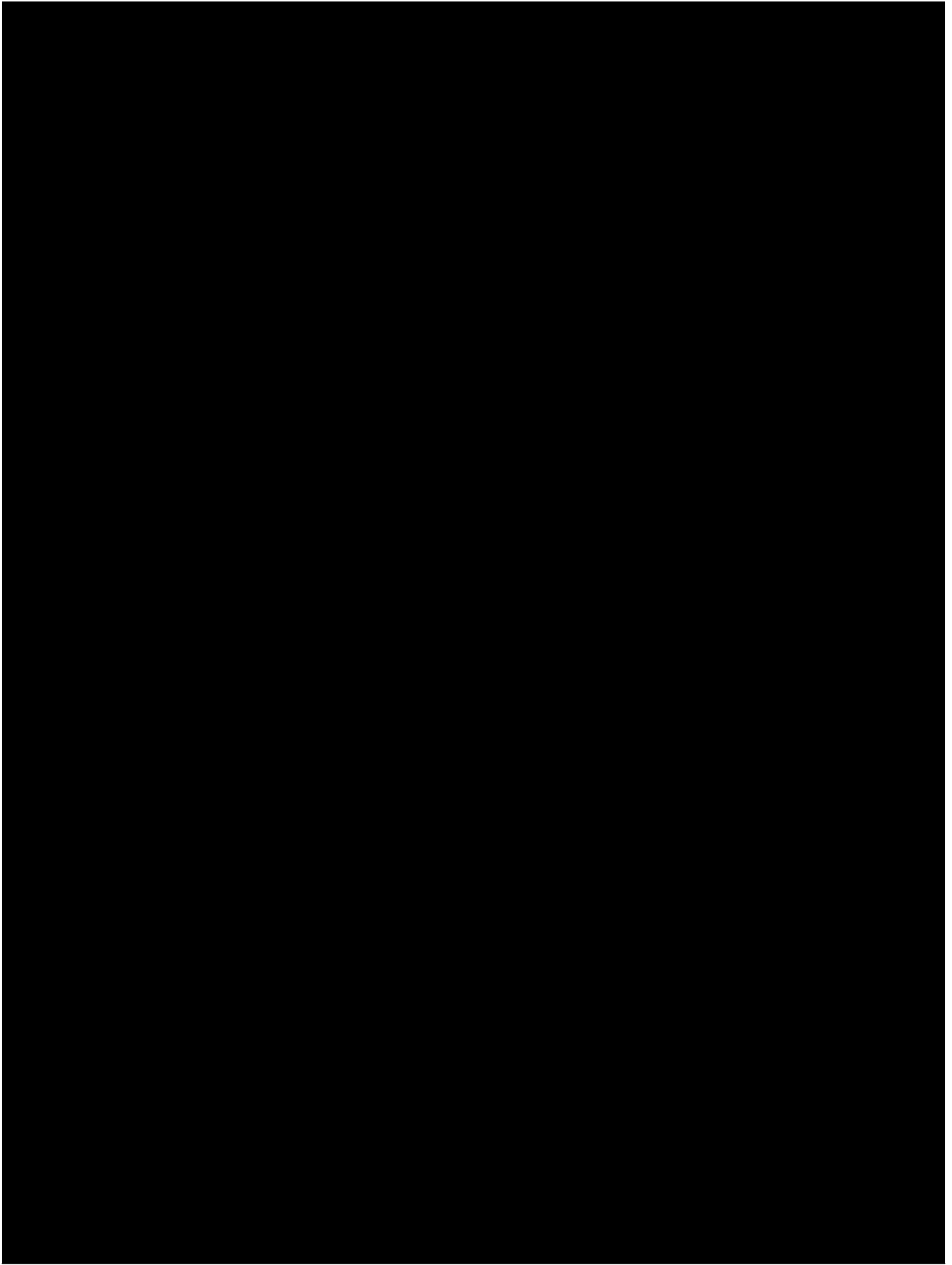
Not applicable. CVEC service territory is not located near or within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management.

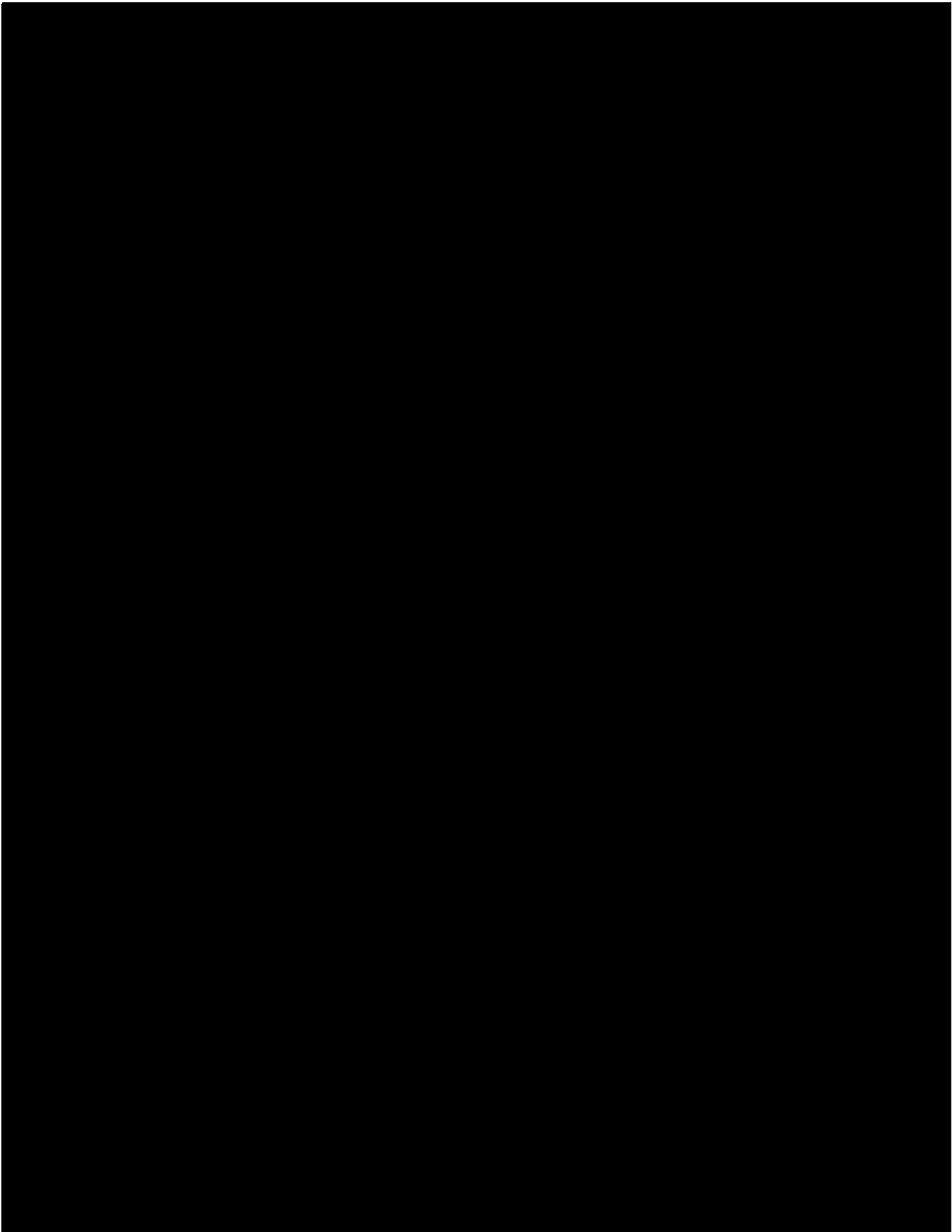
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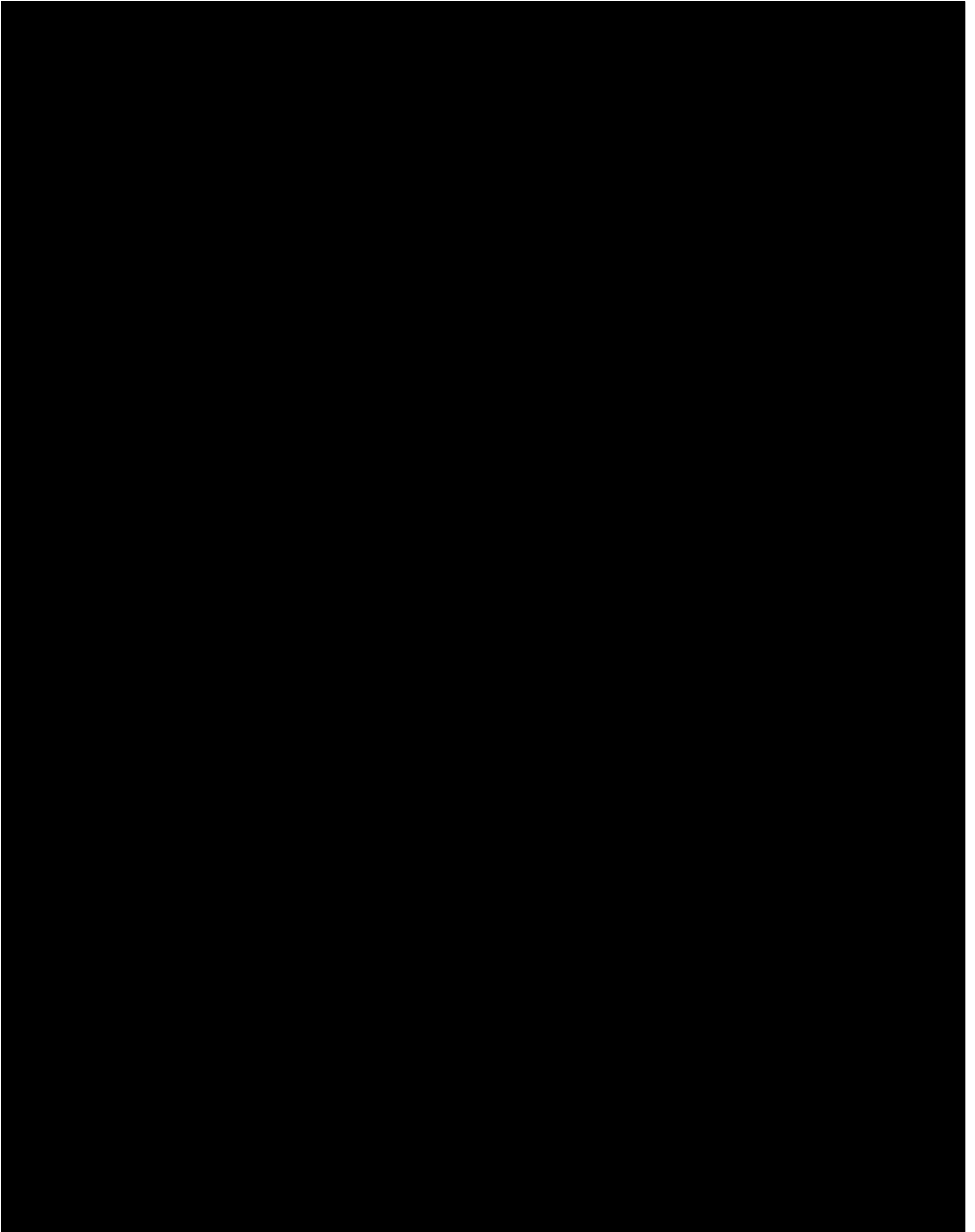
**F. ANNEX F – CYBERSECURITY**

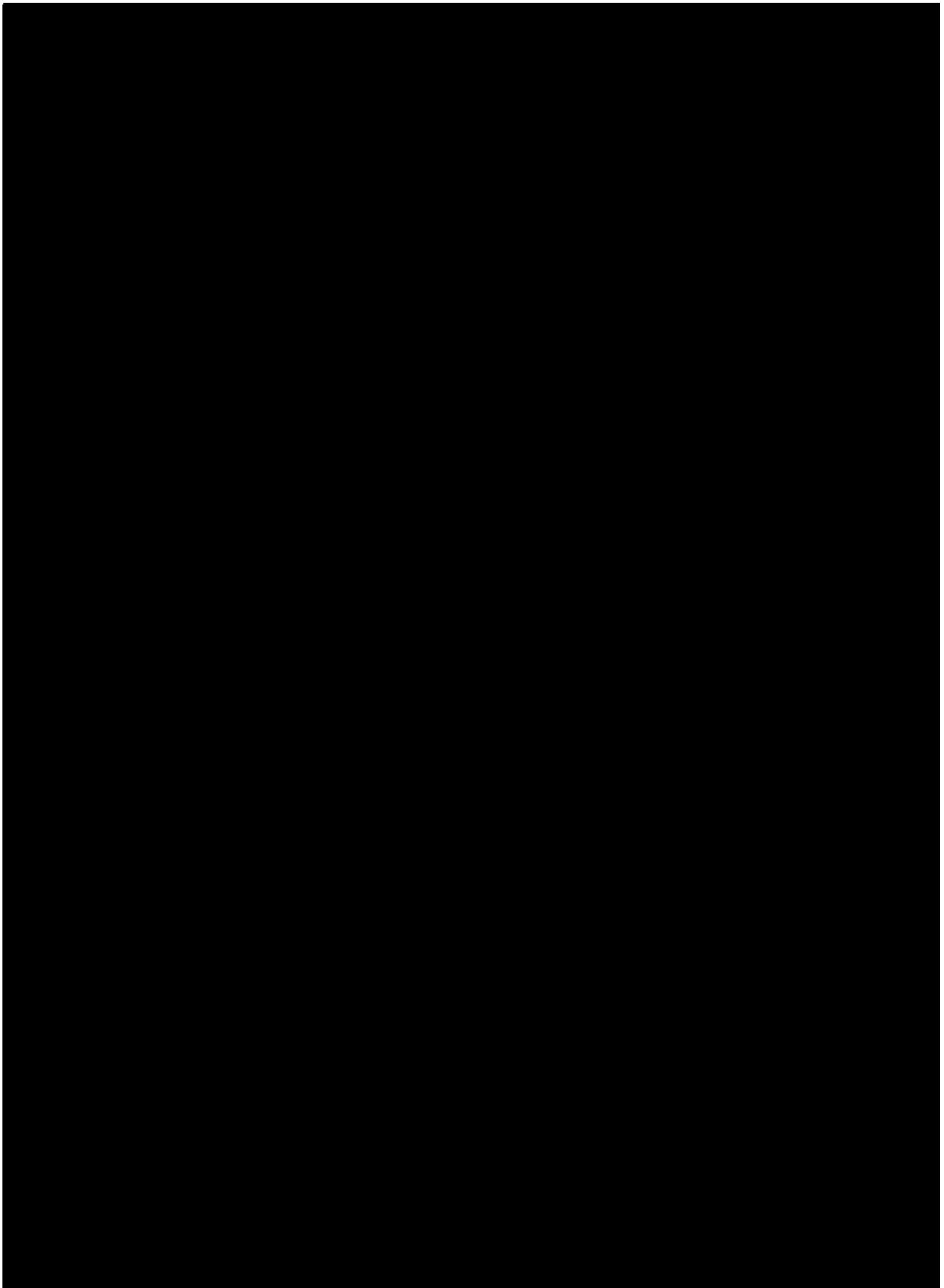


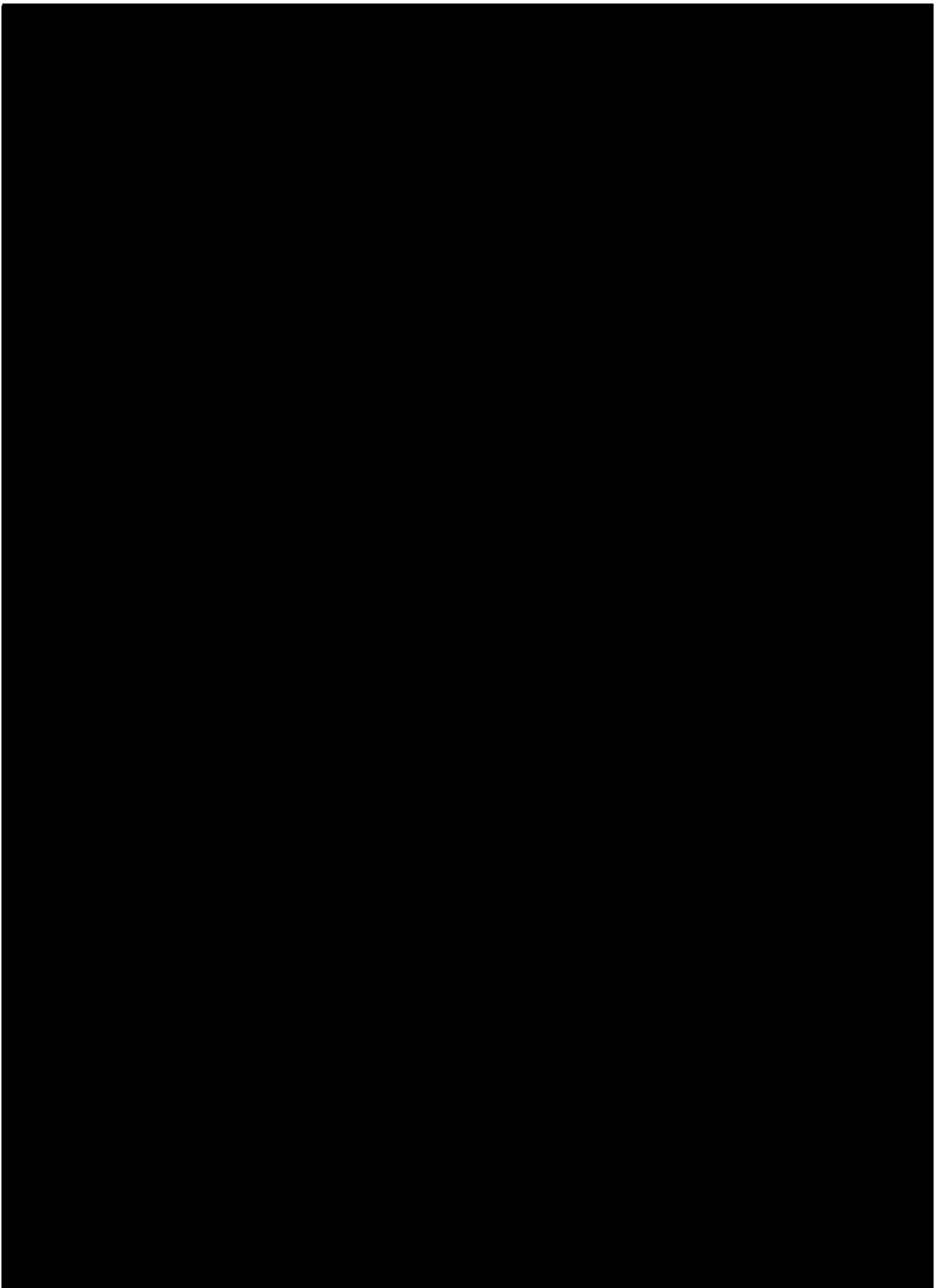


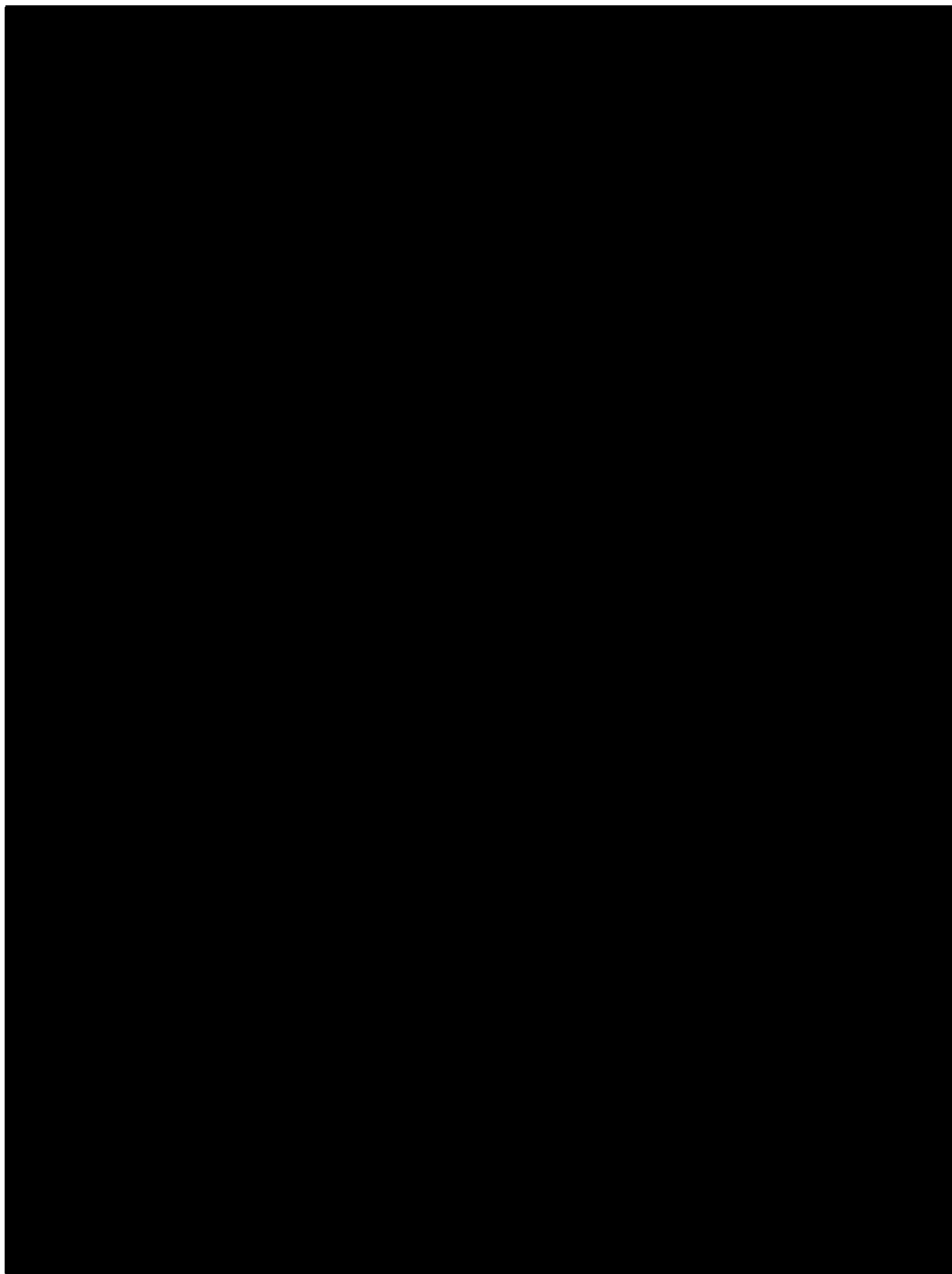


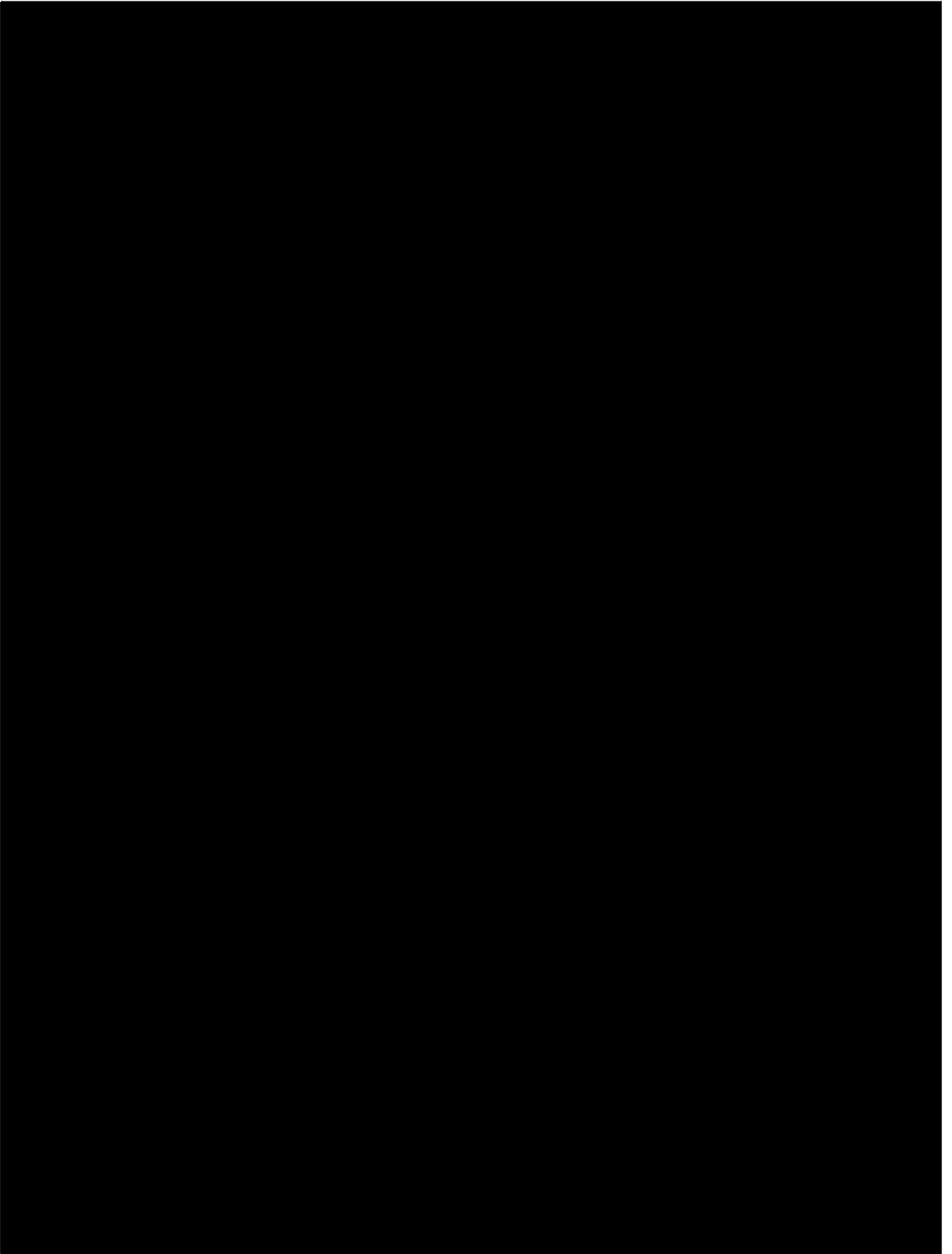


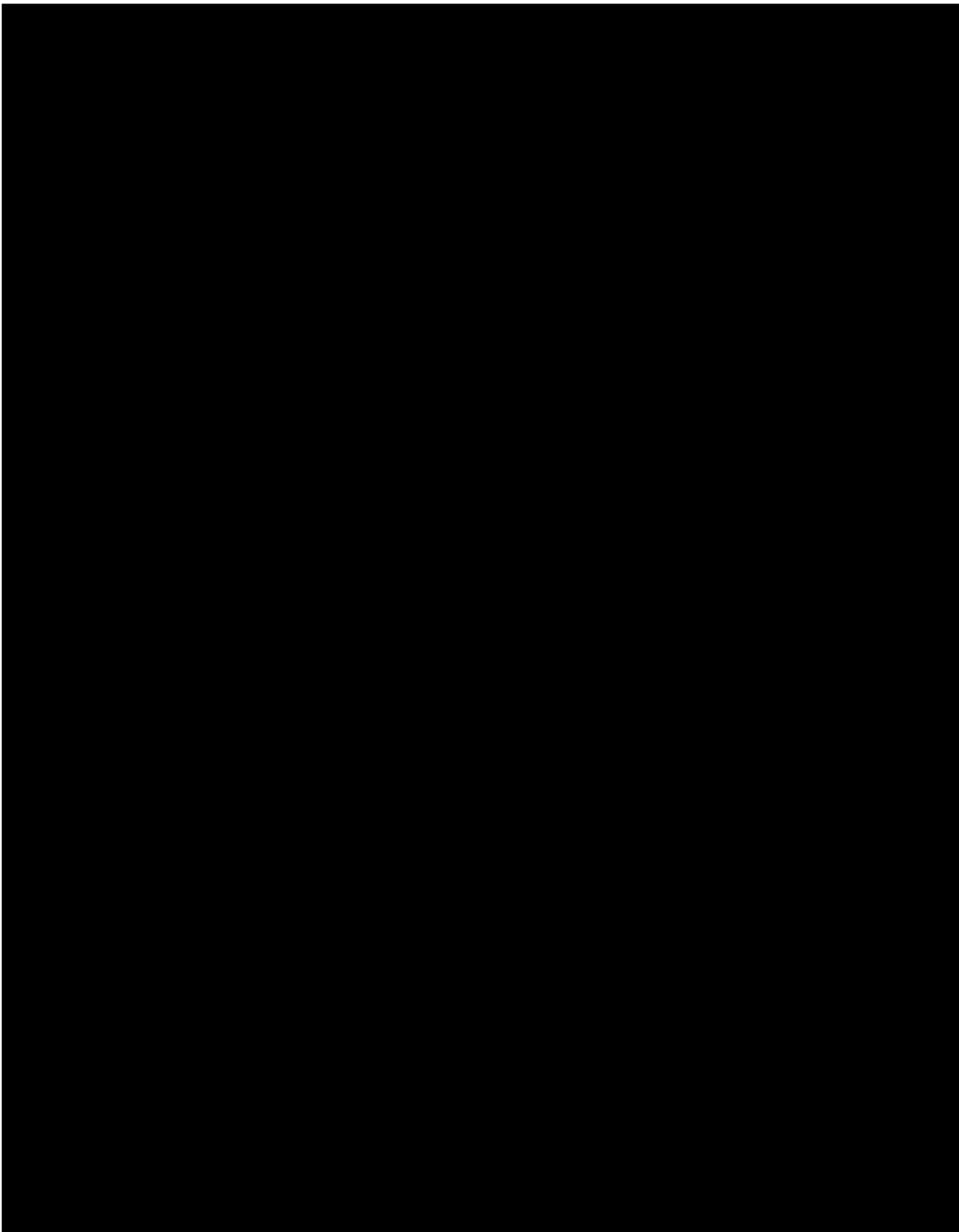


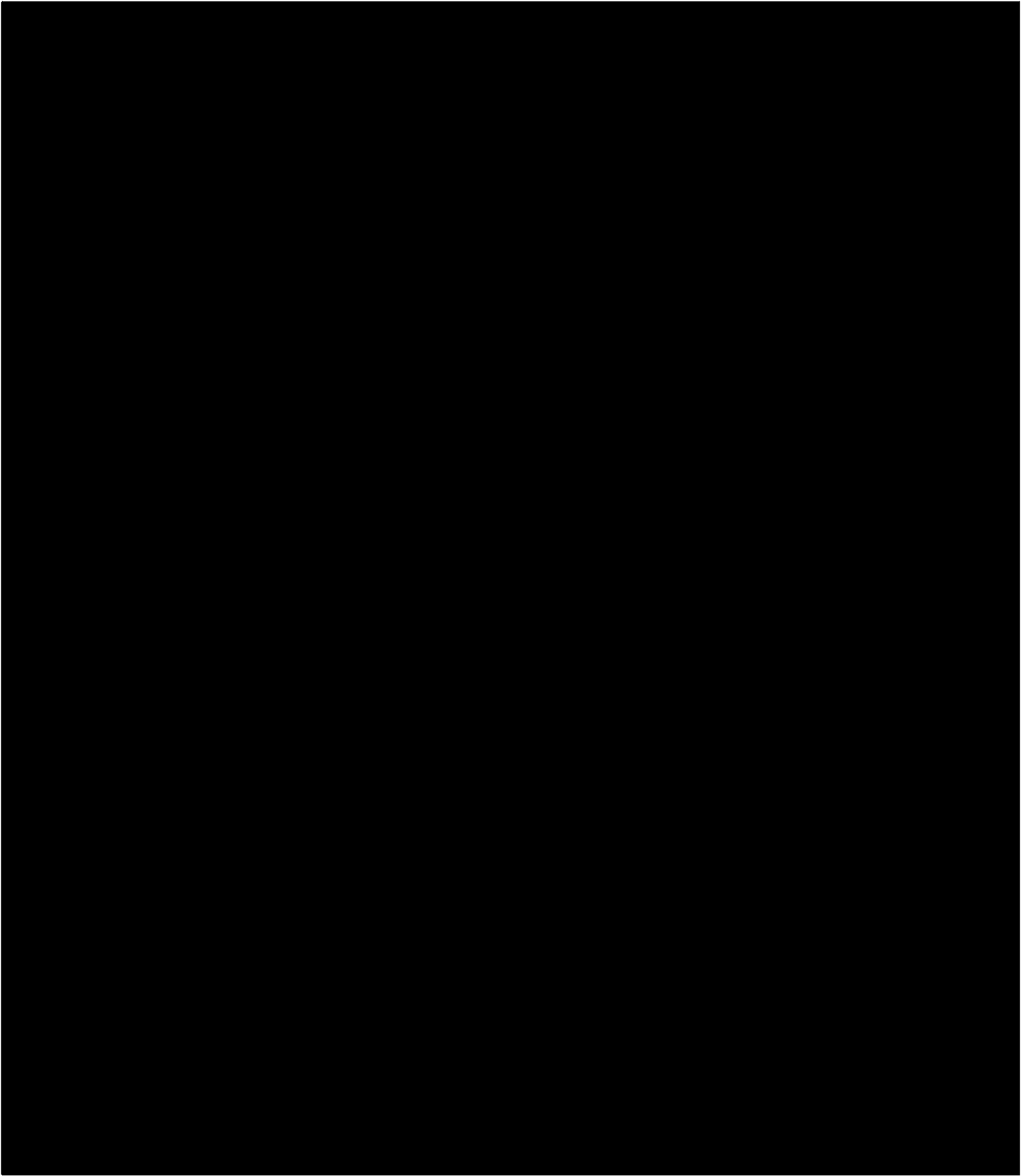


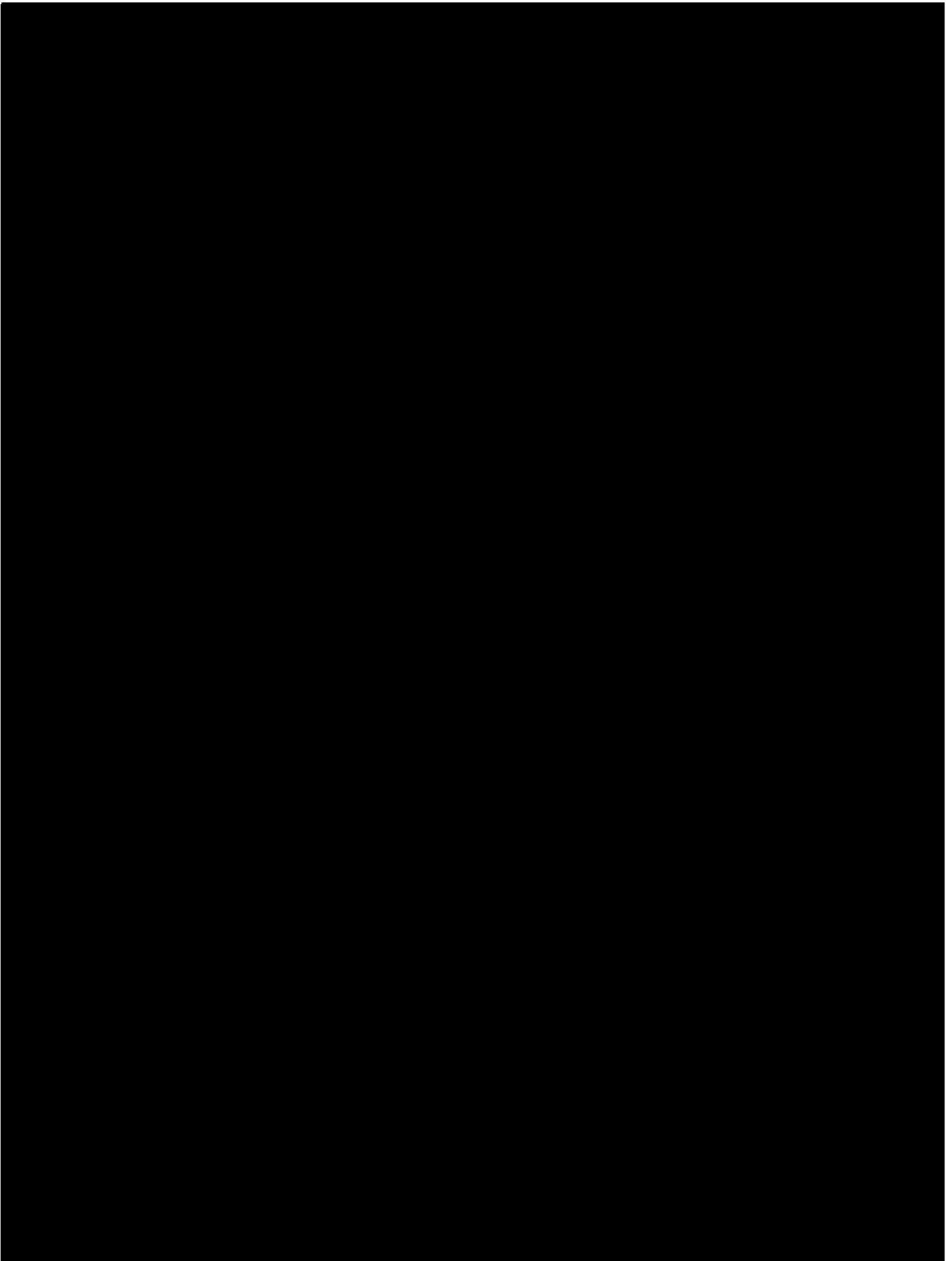


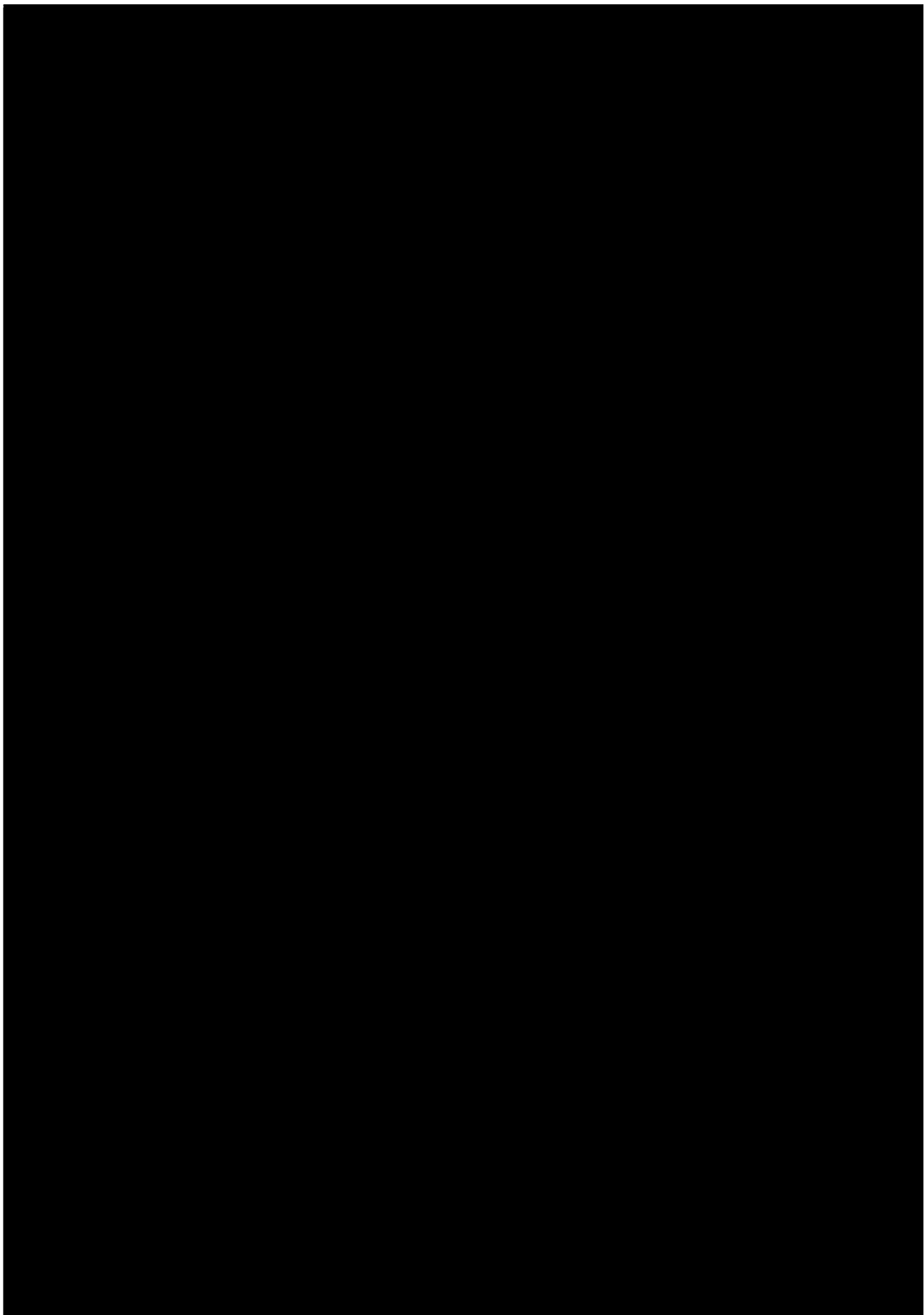


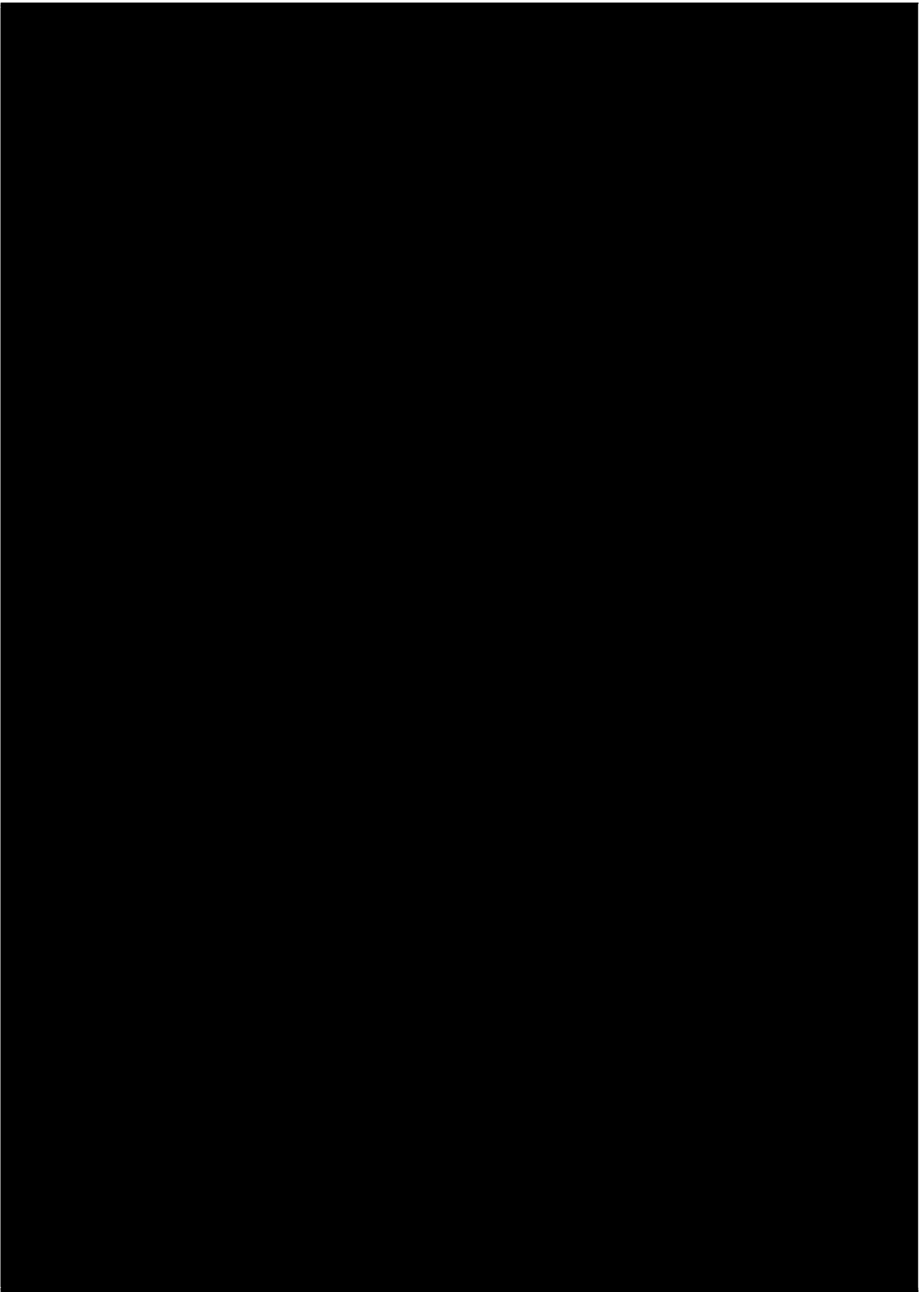


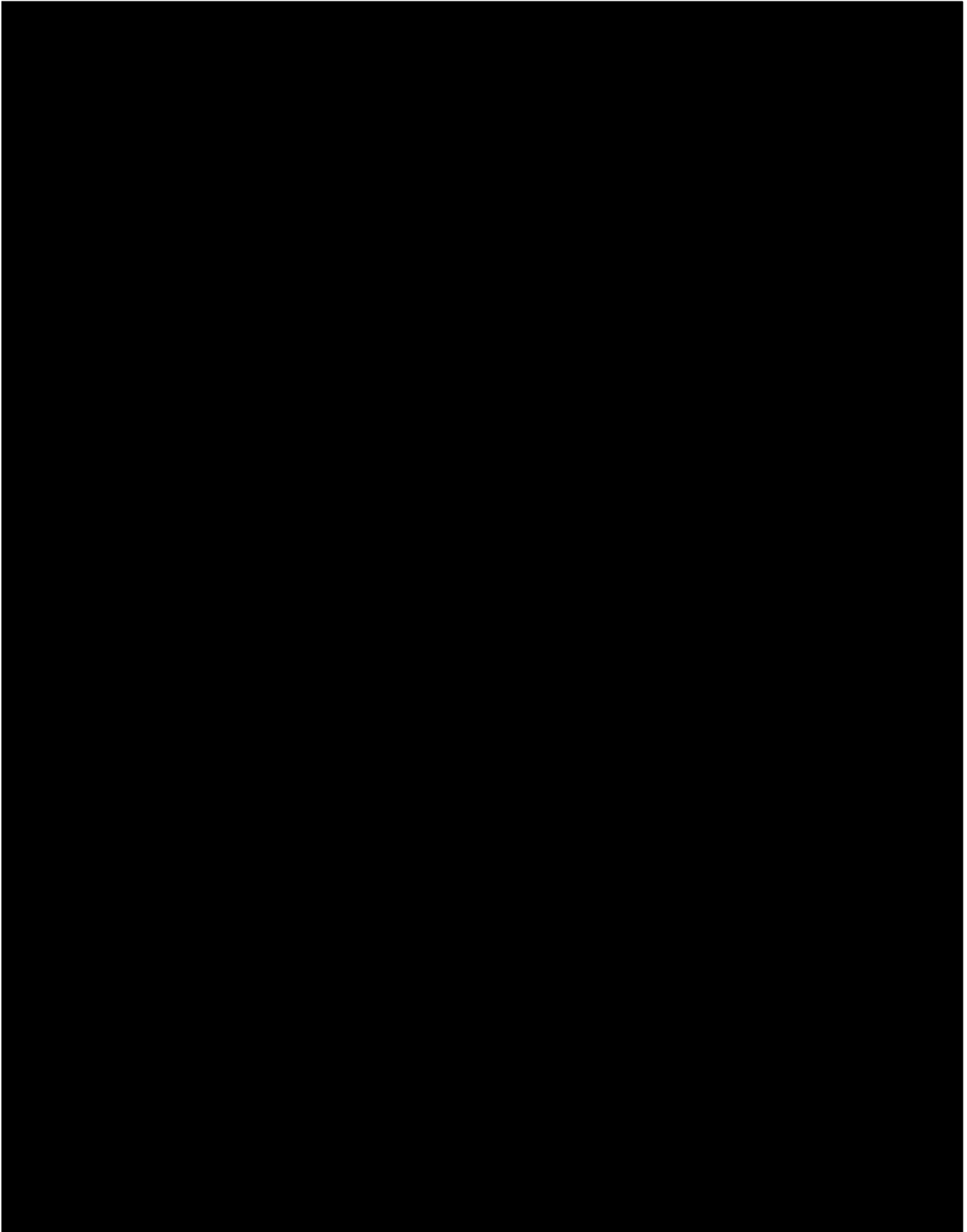


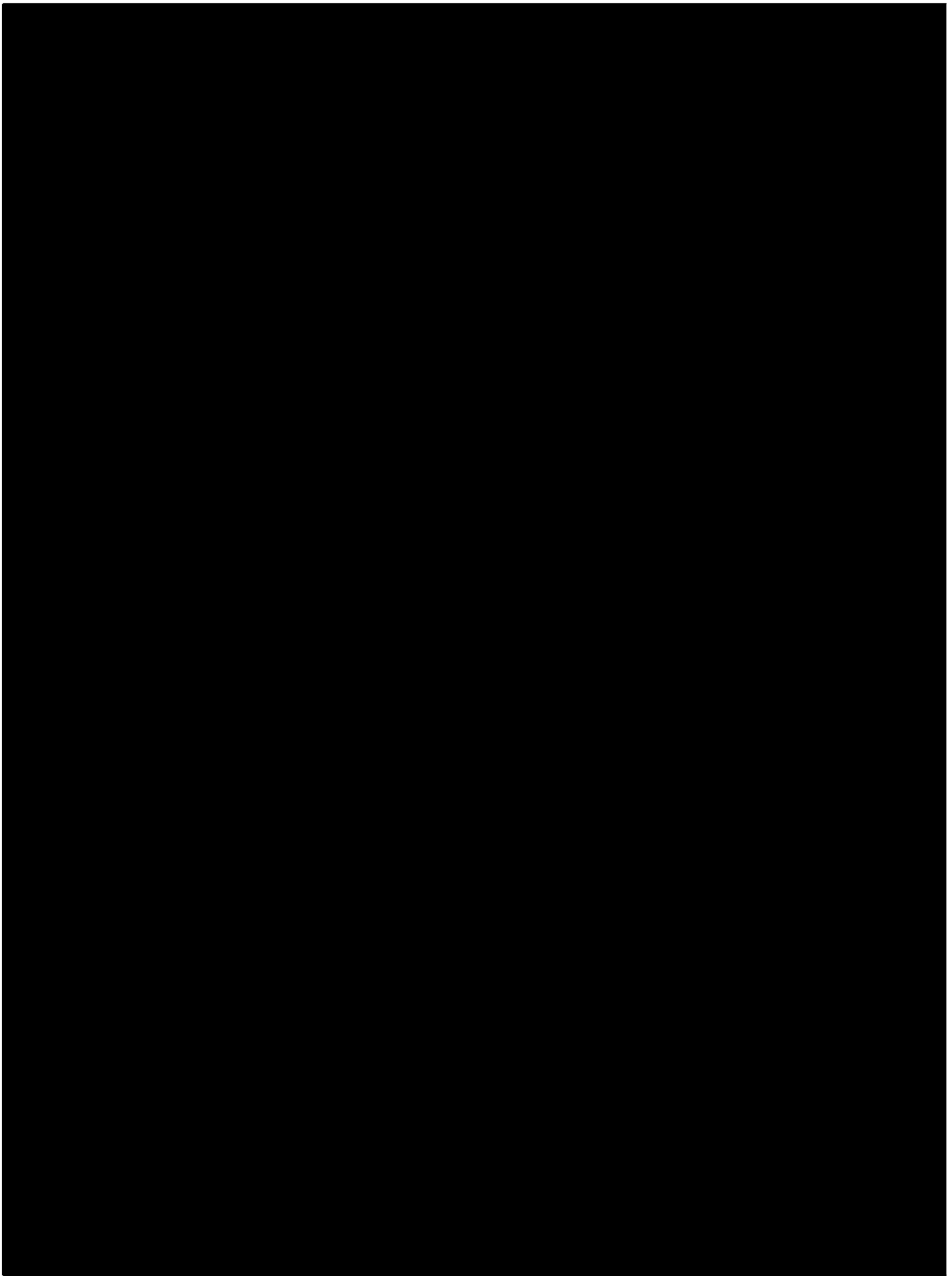


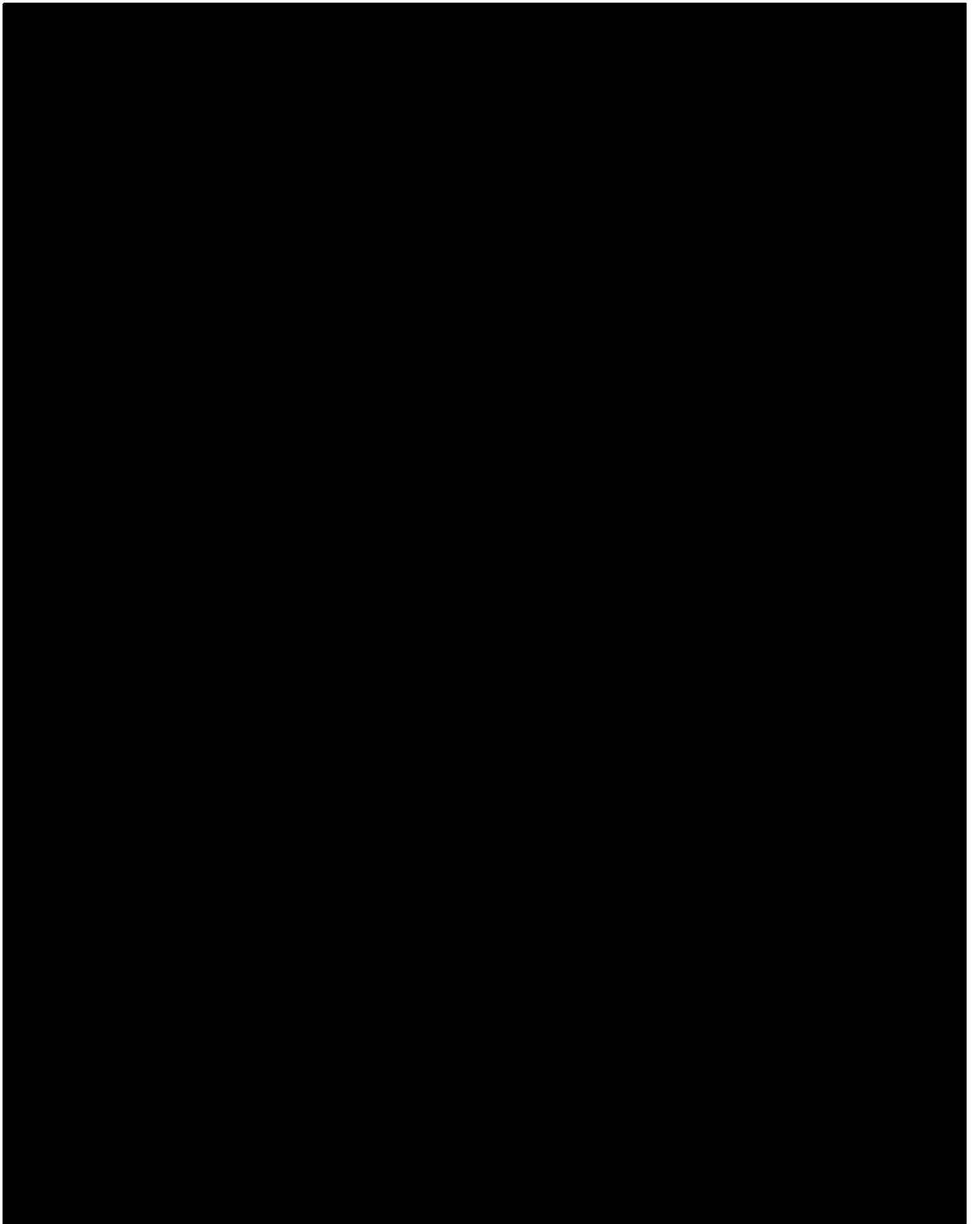


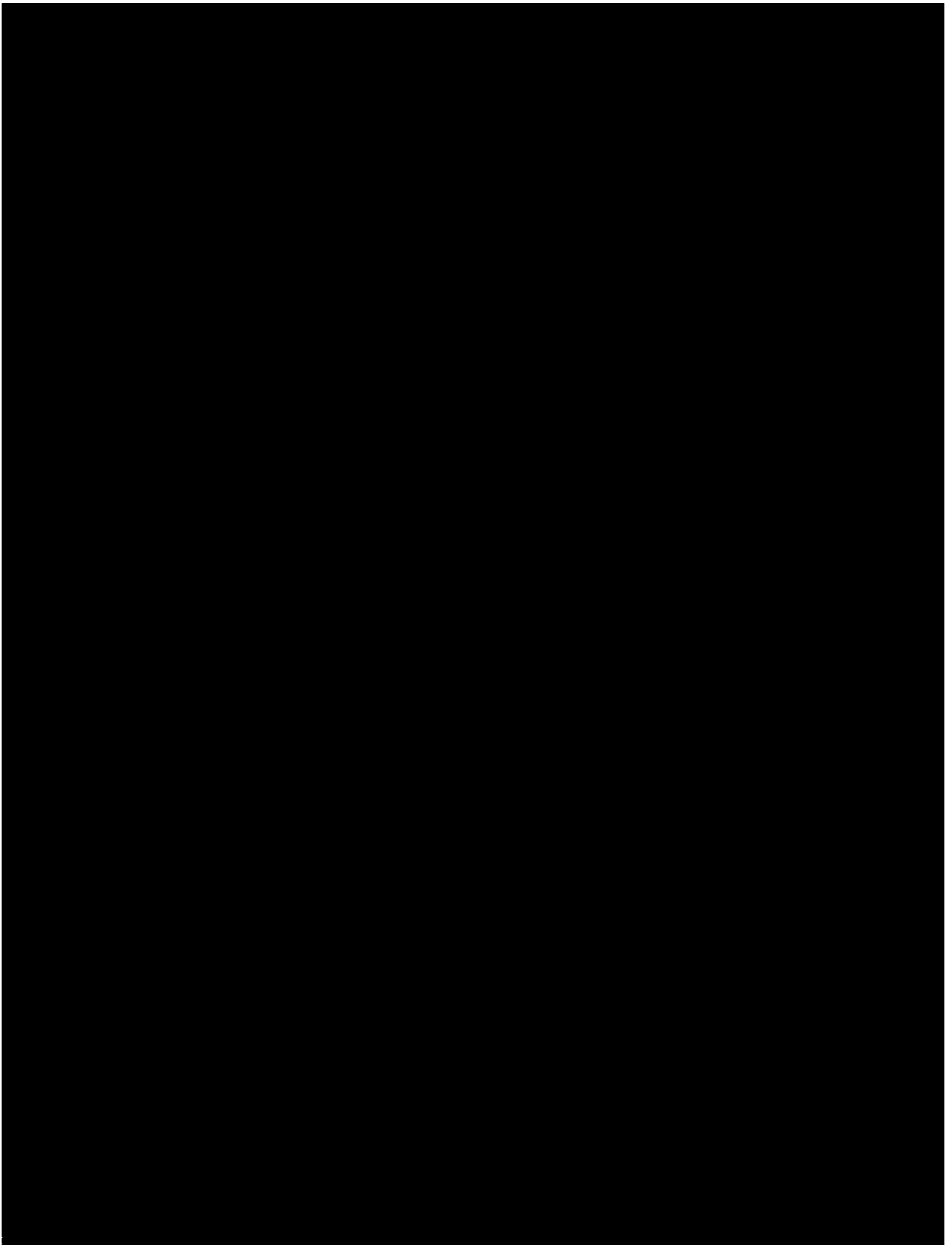


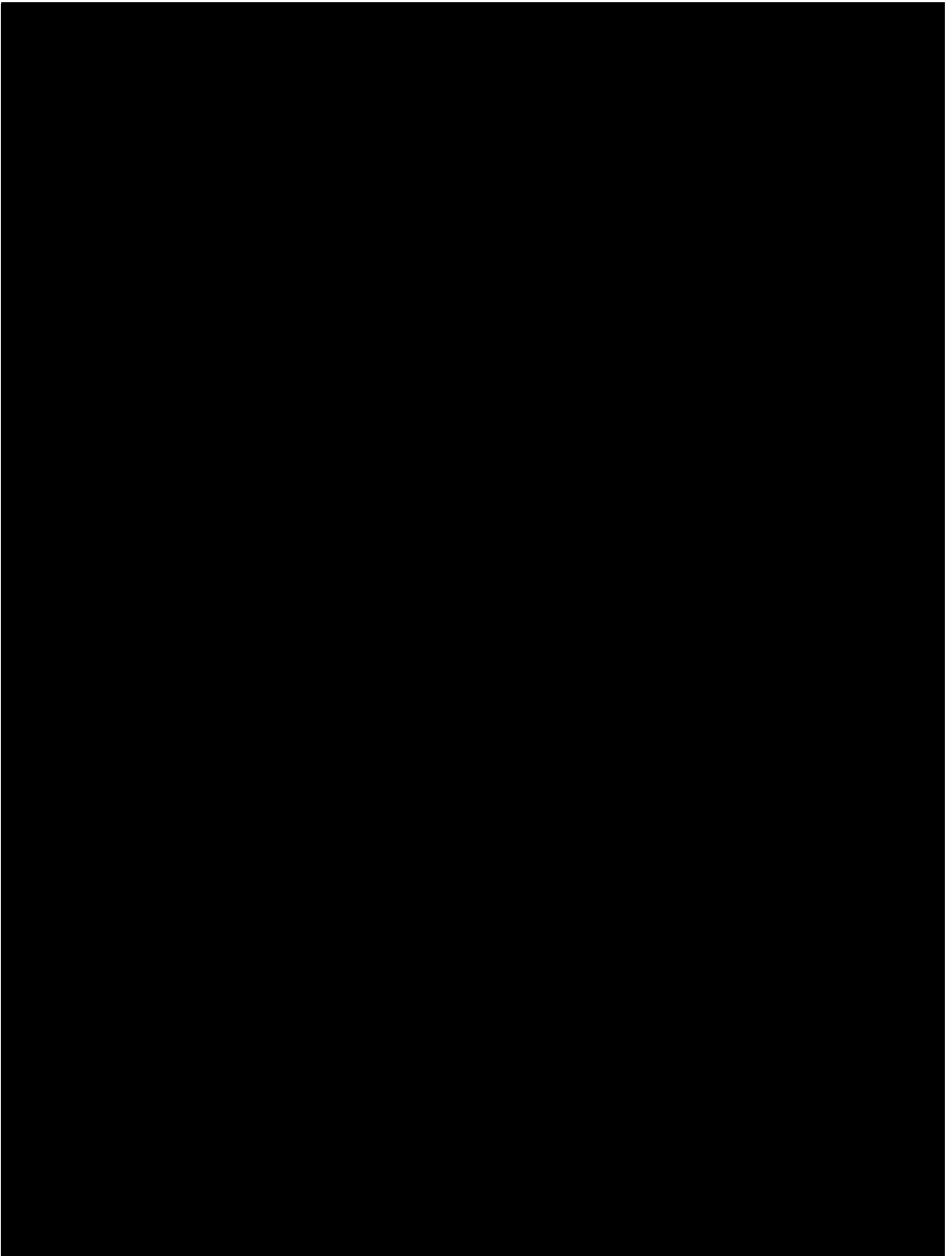


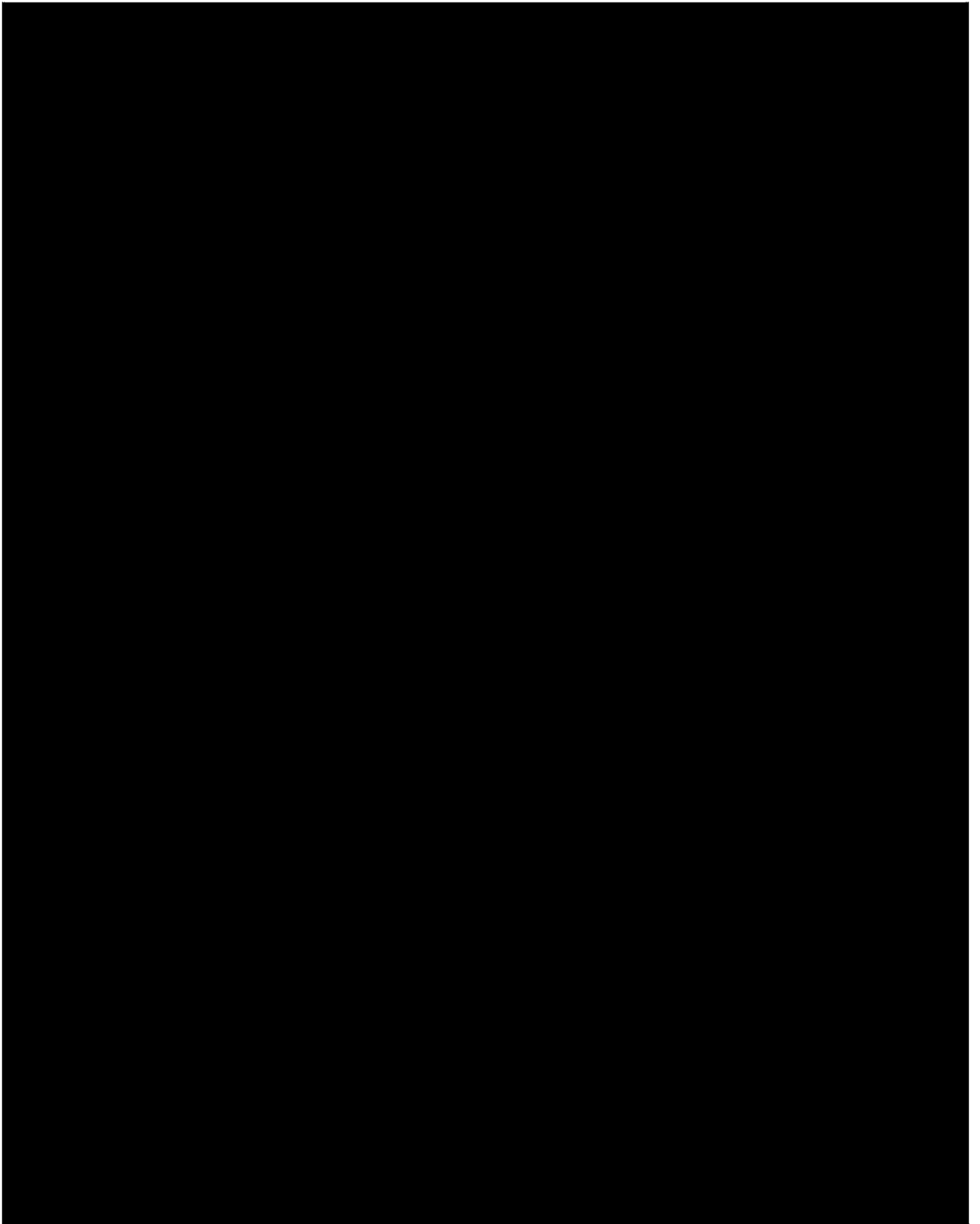


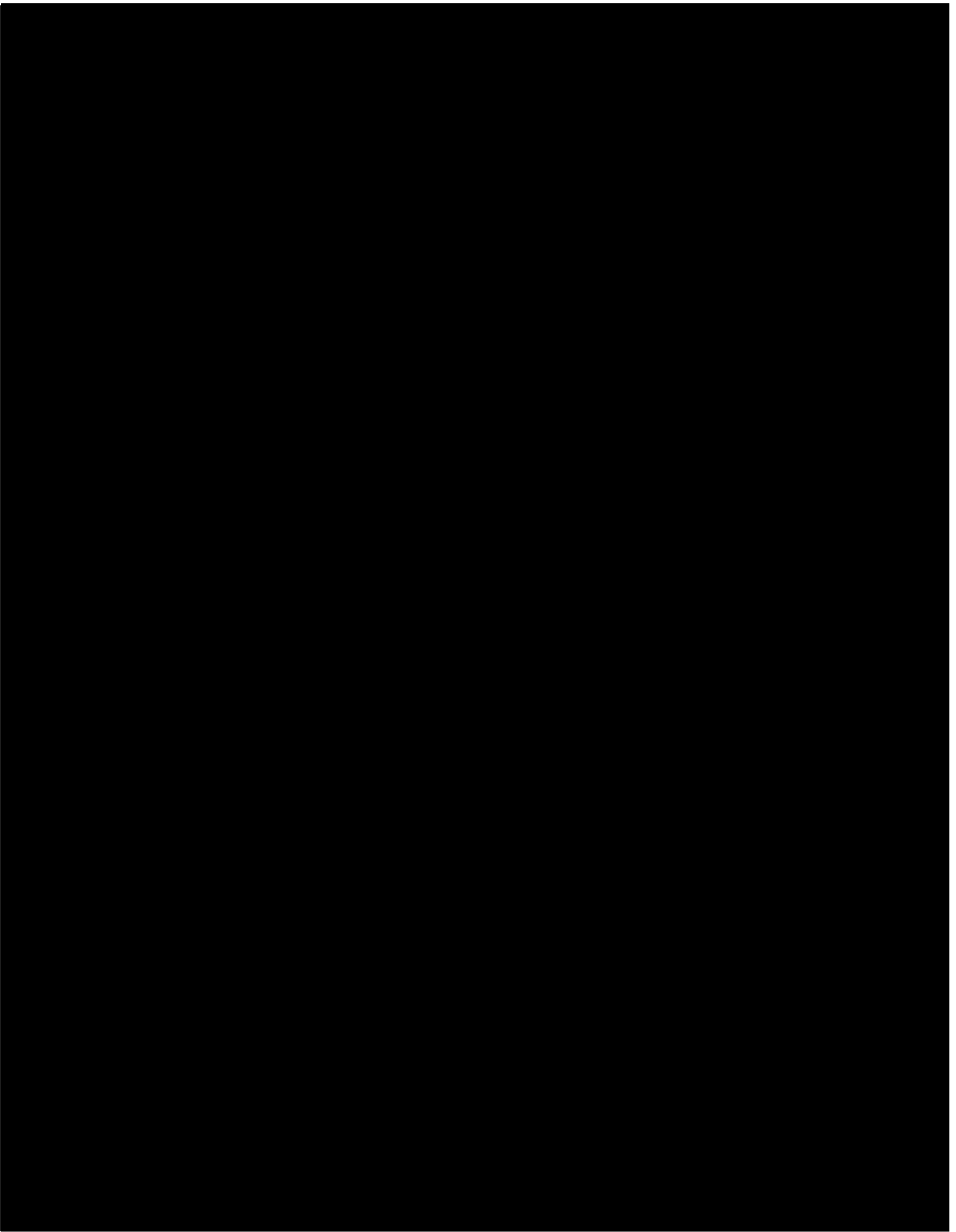




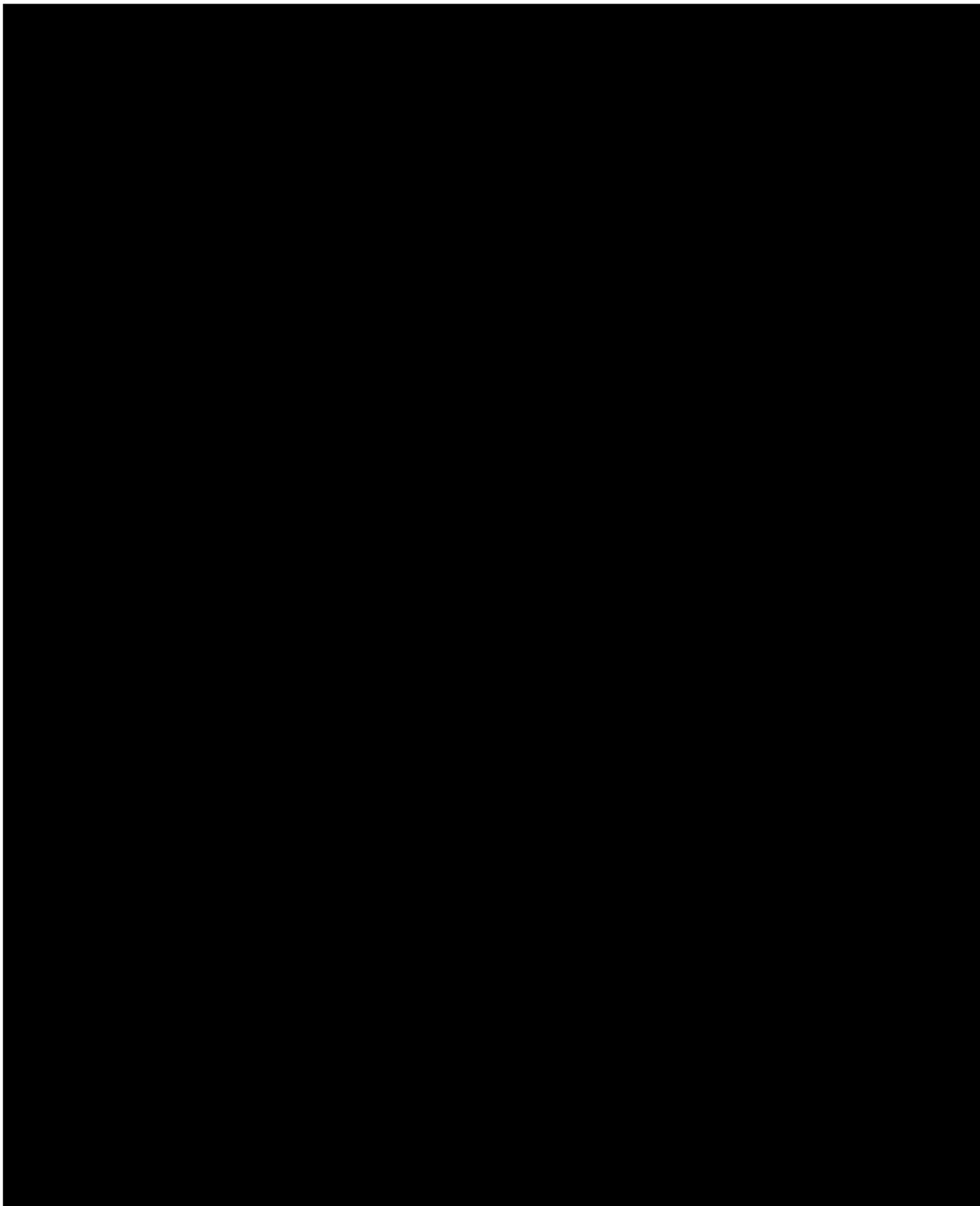


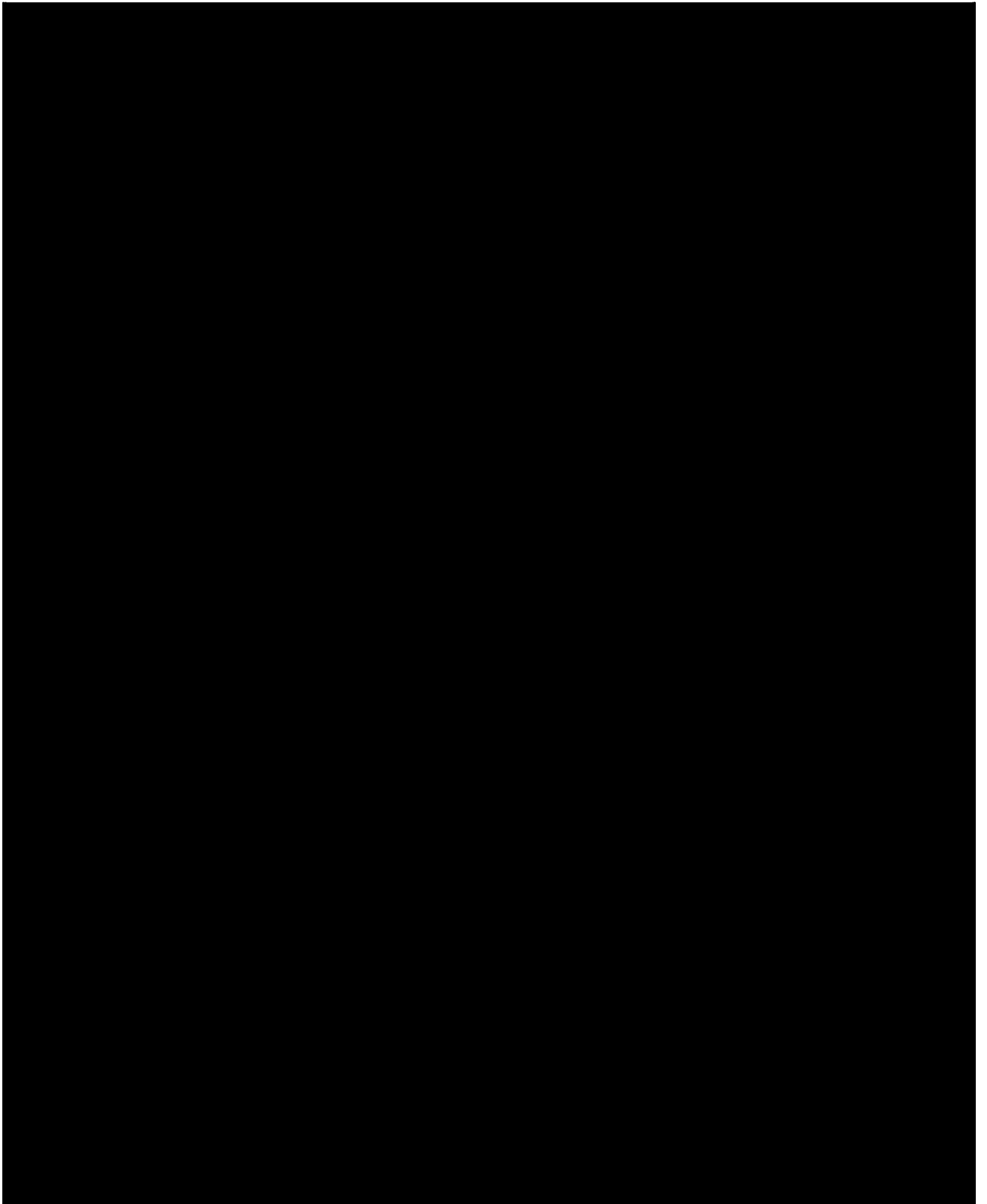


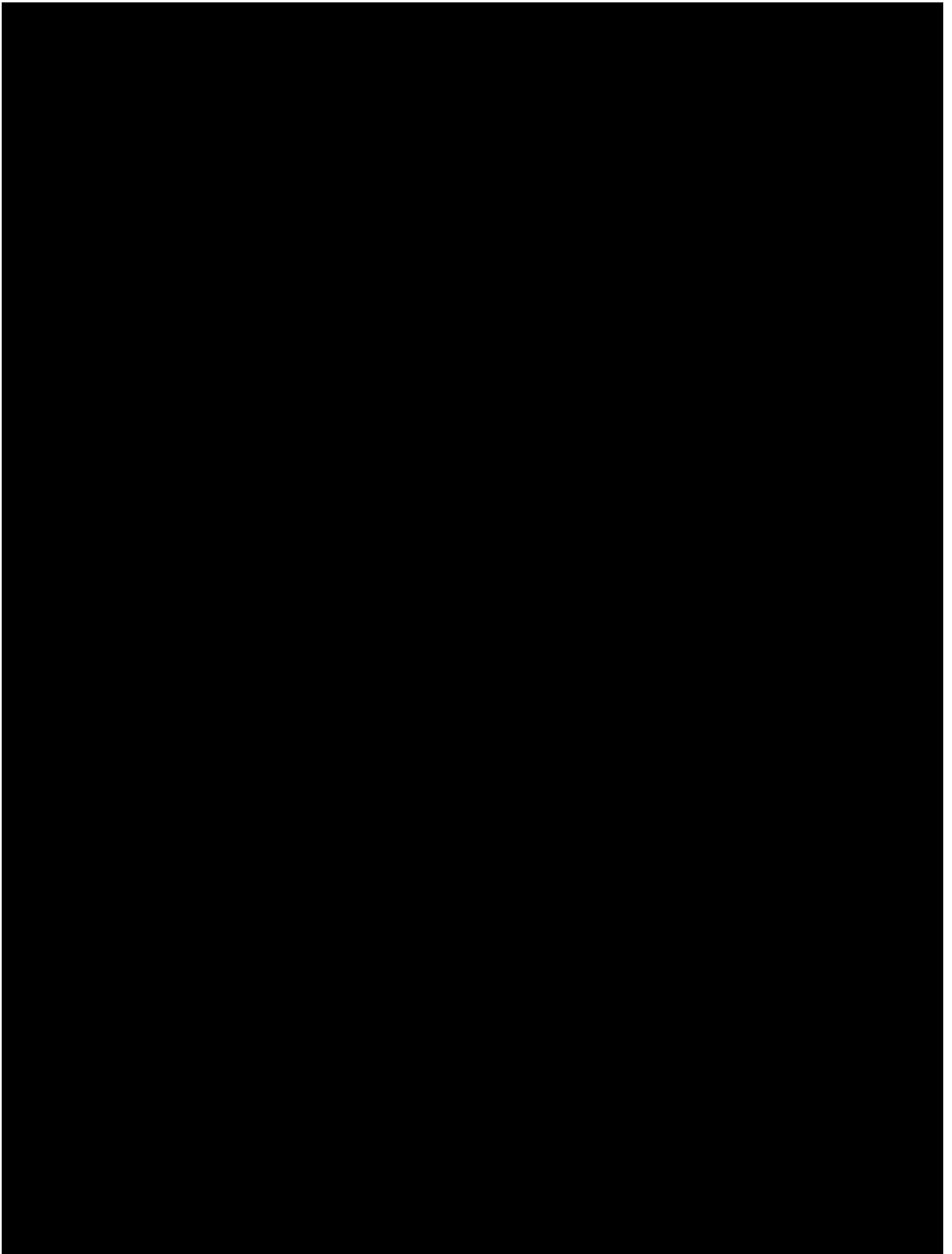


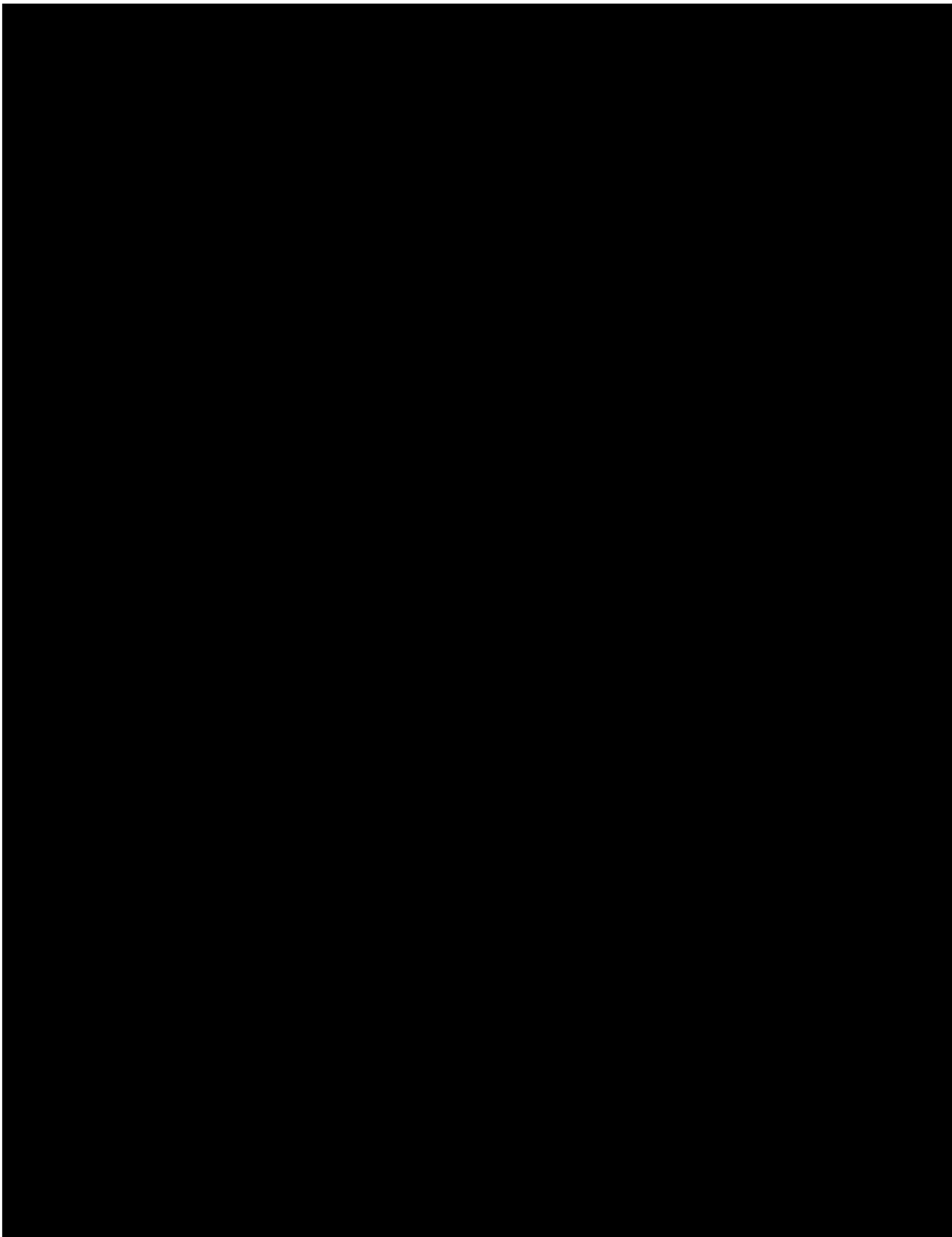


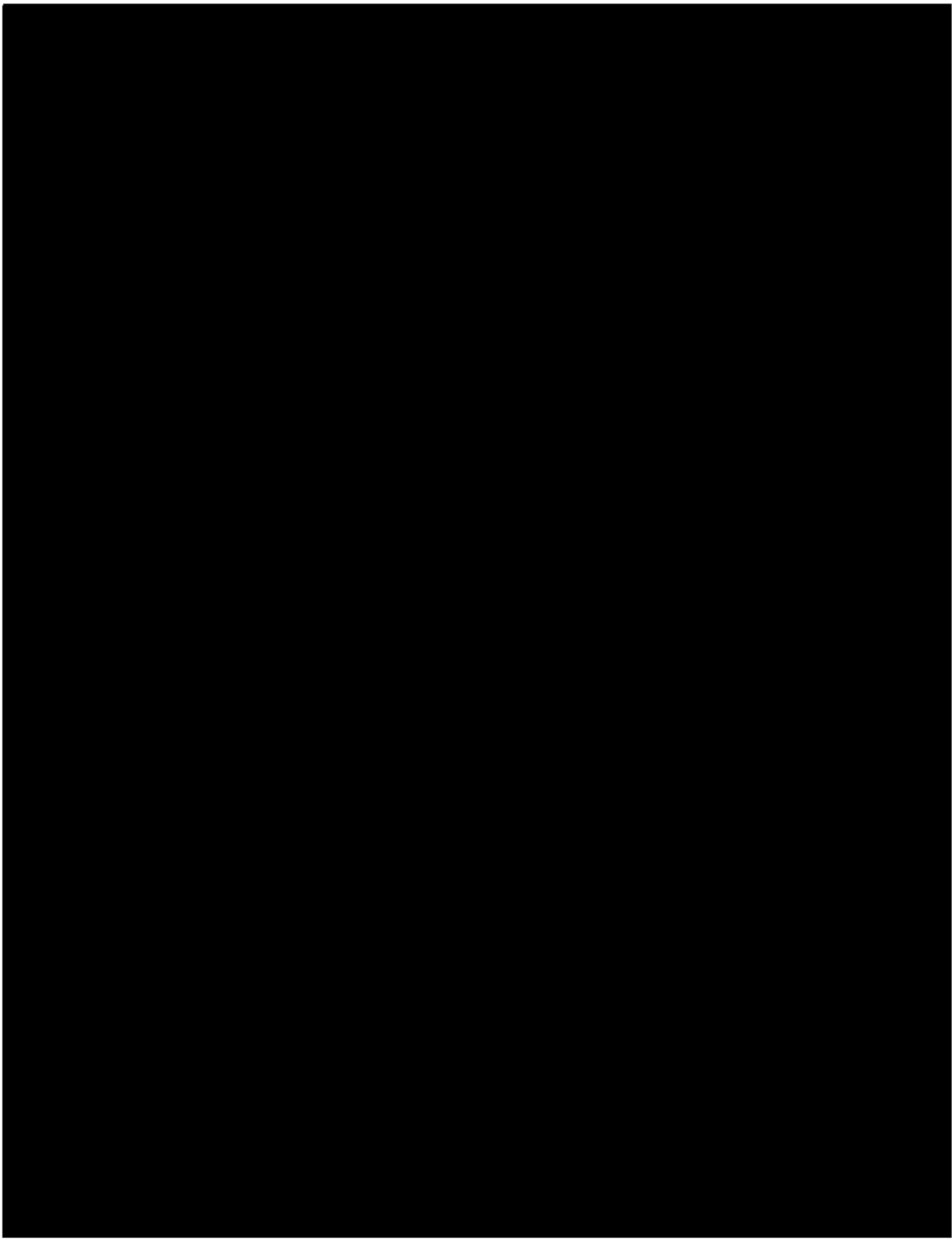
**G . ANNEX G – PHYSICAL SECURITY INCIDENT**

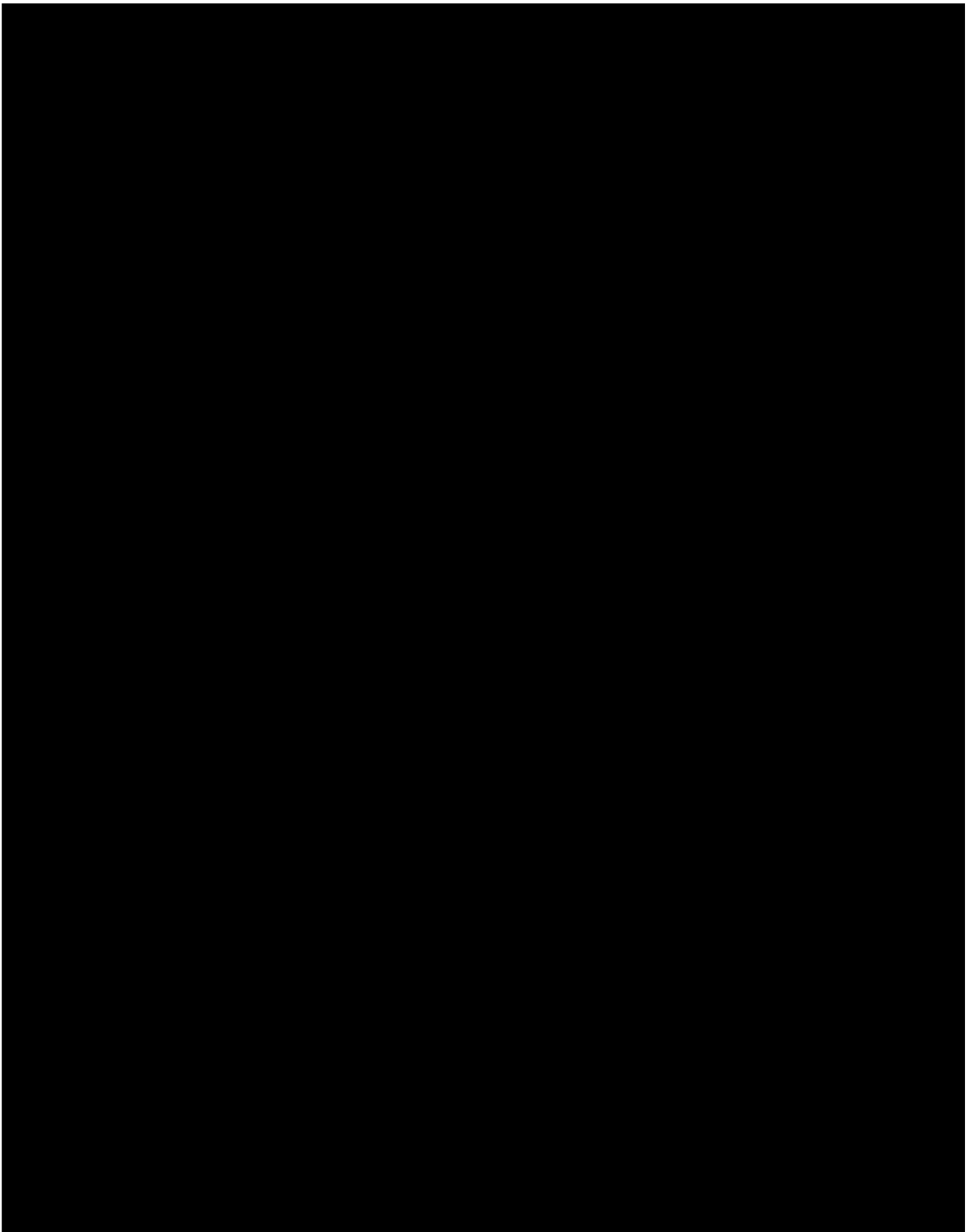












## **H. ANNEX H: REQUIREMENTS FOR TRANSMISSION AND DISTRIBUTION UTILITIES**

Not Applicable. CVEC is not a Transmission and Distribution Utility as defined under 16 TAC §25.5.

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## **VII. REQUIREMENTS FOR GENERATORS**

Not applicable. CVEC does not operate generation assets as defined in 16 Texas Administrative Code § 25.5 (33).

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## **VIII. REQUIREMENTS FOR RETAIL ELECTRIC PROVIDERS**

Not applicable. CVEC is not a Retail Electric Provider as defined under 16 TAC §25.5.

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## **IX. REQUIREMENTS FOR ERCOT**

Not applicable. Requirements apply exclusively to ERCOT.

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## **X. CONFIDENTIAL INFORMATION**

