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Taylor Electric Cooperative, Inc.

226 CR 287, Merkel, Texas 79536 | www.TaylorElectric.com

Emergency Operations Plan

Project No. 51841

Introduction

In compliance to the Public Utility Commission of Texas "PUCT" request for an Emergency Operations Plan "EOP", this document captures the steps outlined in project 51841 as it pertains to Taylor Electric Cooperative, Inc "Taylor". The response will be filed under Project 53385 as requested by the PUCT. Taylor's EOP is drafted in the spirit of transparency to demonstrate how Taylor will respond during emergencies.

Any references to Power Generation Company, Retail Electric Provider, and Electric Reliability Commission of Texas "ERCOT" requirements are not applicable to Taylor Electric, as Taylor is an electric distribution cooperative.

Outage Response Leaders "ORL" are the designated individuals responsible for activating this plan and overseeing implementation.

Yearly submissions will include updates to the following subsections and will be filed with the PUCT by March 15 of each additional year for 5 years:

- (D)(1) Drill table
- (e)(1)(c)(iii) Critical Load Application Submission Dates
- (e)(1)(I)(ii) Number of Consumers
- (e)(1)(I)(iii) Critical Load Shed Member Table

Revision History | this current version supersedes any previous EOP version.

Date	Version	Notes	Board Approved Date

Submission History/Updates | due by March 15 each year.

PUCT Submissions:

Submission Date	Version	Notes

ERCOT Submissions:

Submission Date	Version	Notes

Emergency Operations Plan: Information – Subsection (d)

(1) Key Individuals List

Name	Title	Role
	Substation & Metering Manager	ORL
	Director of Engineering	ORL
	System Control Manager	ORL
	Staking Manager	ORL
	Service & ROW Manager	ORL
	Director of Information Technology	Cyber Security
	Safety & Compliance Manager	EOP Maintenance
	Member Services Manager	External Communications
	Construction & Maintenance Manager	ORL
	Director of Electric Operations	ORL

Emergency events are identified in Taylor's EOP as directed by the PUCT as weather (cold/hot), load shed, pandemic/epidemic, wildfire, hurricane, cyber security, and physical threat.

Year of Event	Drill / Event Date	Drill or Emergency Event*	ORL / EOP Implementation	Date of PUCT Notification
2022				N/A
2023				N/A
2024	TBD			

(2) EOP Distribution Record

Name of Person Receiving EOP	Title	Distribution Date
	Substation & Metering Manager	
	Director of Engineering	
	System Control Manager	
	Staking Manager	
	Service & ROW Manager	
	Director of Information Technology	
	Safety & Compliance Manager	
	Member Services Manager	
	Construction & Maintenance Manager	
	Director of Electric Operations	

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(4) Affirmation of Receiving, Understanding, and Commitment to EOP

I, [REDACTED] affirm that key operating personnel are familiar with and have received training on the contents of the EOP and are committed to following the EOP. I have reviewed the EOP and will delegate drills being performed on a yearly basis. If needed, our compliance department will distribute to local jurisdictions. If any type of an emergency occurs personnel will develop a specific return to normal operations path. This path will be developed and followed after any disruption caused by incident or emergency. The Emergency personnel who are designated to interact with local, state, and federal emergency management officials during an emergency have received National Incident Management System training; IS-100.c, IS-200.c, IS-700.b, IS-800.d. See Section (h) for signed affidavit.

(5) Communications Plan

Complaints and Communications with Public

Complaints from the public will be logged in the phone system and investigated by operations personnel pending the validity of the complaint. Public communication will be conducted by press releases to the media and/or Taylor social media posts by the Member Services Department.

Communication with Media

- Taylor's Member Services Department will communicate with the media via press releases and respond to request for interviews.

Communication with Consumers

- Taylor will communicate with consumers via press releases, social media post, and/or direct communication. Consumers contact Taylor through phone calls with Member Services Representatives, the backup Call Center, social media post, or email.

Communication with Public Utility Commission of Texas

- Taylor reports significant outages as required by 16 TAC § 25.52; see (l)(ii). Taylor will respond to any request for information made by the PUCT, as required.

Communication with Department of Energy "DOE"

- Taylor will file DOE Form OE-417, within 60 minutes of the time of system disruption.

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

http://www.eia.gov/survey/form/oe_417/instructions.pdf

Communication with Government, Officials, and Emergency Operations Centers

- Taylor will respond to any request from Government, Officials, and Emergency Operations Centers either directly or through the statewide organization Texas Electric Cooperatives.

Communication with applicable Reliability Coordinator

- All communication to Taylor from the Reliability Coordinator will be handled through Taylor's 24/7 System Control. The ORL will be stationed in System Control during an EOP event.

Communication with critical load consumers.

- Director of Marketing & Key Accounts will communicate pertinent information regarding the emergency event.

(6) Supplies for Emergency Response

The table below outlines pre-identified supplies that may be needed during an emergency event.

Supply Name	Location	Point of Contact
Electrical Supplies		
Fiber Supplies		
Substation Equipment		
Personal Protective Equipment		
Additional FR Clothing		
Vehicle Additives		
Additional Food / Water		
Additional Fuel		
Computer Equipment		

(7) Staffing Plan during Emergency Response

- Taylor will utilize a pre-identified on-call list for appropriate staffing during an active Emergency Response. The on-call list is updated monthly and contains ORL's and first and second responders.
- Operations personnel are rotated with 16 hours *on* and 8 hours *off* work shifts to accommodate rest and continuity.
- Office personnel backfill areas not requiring specific qualifications during prolonged events.
- Contractors are notified to be included in on-call list.

- Warehouse will be requested to add additional staff for emergency events.
- Mutual Aid, including the Federal Emergency Management Agency, will engage as necessary.

(8) Weather Emergency Operation Plan Activation

Taylor has a 24/7 System Control Operations Center that monitors current and forecasted weather conditions. Emergency personnel participate in Texas Energy Reliability Council "TERC" industry coordinated phone calls.

When a TERC phone call occurs, the ORL activates the pre-emergency event. As a weather hazard approaches, the ORL activates the EOP in accordance with the appropriate Storm Escalation Level. The Storm Escalation Levels are defined in the proceeding Emergency Events Subsection (e)(1).

Emergency Events - Subsection (e)(1)

Identification of Weather-Related Hazards

Taylor's System Operators will monitor weather conditions, county emergency management alerts, and state agency advisories. ORLs will also participate in applicable State Operations Center and Texas Energy Reliability Council phone calls prior to and during weather and wildfire events.

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

Pre-Storm Watch

Precautionary level preceding the arrival of an anticipated severe weather event; level would be activated following a severe weather forecast. The System Operator will monitor situation and advise ORL. System Operator and/or ORL may request assistance to acknowledge outage phone calls.

- Expected outage time: None
- Scope of outage: No members out of service
- Initiated by: System Operator or ORL

Level 1

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

- Expected outage time: Less than 4 hours
- Scope of outage: Less than 250 members
- Initiated by: System Operator or ORL

Level 2

Service likely to be restored in less than 12 hours without third-party assistance. All operations personnel to report.

- Expected outage time: 4 to 12 hours
- Scope of outage: Entire substation or major feeder
- Initiated by: ORL

Level 3

Requires third-party assistance to restore service. All Taylor personnel must report.

- Expected outage time: More than 12 hours
- Scope of outage: Widespread damage to system
- Initiated by: ORL or General Manager
- ORL will have full responsibility for coordinating restoration activities

(A) Cold Weather Emergency

Purpose

The intent of this section is to outline Taylor's response to grid conditions and outages during cold weather events.

- i. Operational Plans
 - a. Identify ORL.
 - b. ORL and other Operation Managers approve rotation of crews.
 - c. Transportation Department treats diesel fuel in trucks and ensures window de-ice fluid is available. Snow chains will be utilized if necessary.
 - d. Operations personnel have adequate cold weather Personal Protective Equipment "PPE".
 - e. Notify warehouse staff to ensure they are stocked and prepped for cold weather event.
 - f. Notify Taylor's contractors, Statewide (Texas Electric Cooperatives), and other mutual aid cooperatives when necessary.
- ii. Checklist for Transmission Response
 - a. Taylor has minimal radial transmission from transmission delivery points to Taylor's distribution substations. Taylor's transmission operator is [REDACTED] [REDACTED] Taylor's transmission response is limited to switching and line patrol at the direction of the transmission operator.
- iii. Pre & Post Weather Emergency Meetings
 - a. Pre and Post Weather Emergency Meetings will be held to plan for upcoming events and review lessons learned from past events. Meetings will include discussing supplies or personnel required to adequately respond to the cold weather emergency. ORL will delegate supply acquisition and additional assistance.

(B) Hot Weather Emergency

Purpose

The intent of this section is to outline Taylor's response to grid conditions and outages during hot weather events.

- i. Operational Plans
 - a. Identify ORL.
 - b. ORL and other Operation Managers approve rotation of crews.
 - c. Transportation Department to ensure spare tires and coolant fluid are available.

- d. Ensure operations personnel have adequate hot weather PPE; including sunscreen, neck gaiters, head shades.
 - e. Notify warehouse staff to ensure they are stocked and prepped for hot weather event.
 - f. Notify Taylor's contractors, Statewide (Texas Electric Cooperatives), and other mutual aid cooperatives when necessary.
- ii. Checklist for Transmission Response
 - a. Taylor has minimal radial transmission from transmission delivery points to Taylor's distribution substations. Taylor's transmission operator is [REDACTED] Taylor's transmission response would be limited to switching and line patrol at the direction of the Transmission Operation Center "TOC".
- iii. Pre & Post Weather Emergency Meetings
 - a. Pre and Post Weather Emergency Meetings will be held to plan for upcoming events and review lessons learned from past events. Meetings will include discussing supplies or personnel required to adequately respond to the hot weather emergency. ORL will delegate supply acquisition and additional assistance.

(C) Load Shed

Purpose

The intent of this section is to outline Taylor's load shed procedures as required by Electric Reliability Council of Texas.

i. Procedures for Controlled Load Shed:

Manual load shed request will be made from the TOC.

The manual load shed plan is in Taylor's System Control.

1. Feeders to be shed will be calculated using the target amount provided by the TOC.
2. Feeders, which are Supervisory Control and Data Acquisition "SCADA" controlled, will be switched off remotely by System Operators.
3. Feeders without SCADA control will be manually shed by operations personnel prepositioned in the field.

Steps 1-3 will repeat until the load shed period is complete.

Critical Load Shed Registry will be exempt, when possible.

ii. Priority Plan for Restoring Load Shed

1. Feeders will be restored using the target amount provided by the TOC.
2. Feeders which are SCADA controlled will be restored remotely by System Control Operators.
3. Feeders without SCADA control will be restored manually by operations personnel prepositioned in the field.
4. Critical Load Registry will be given priority restoration if shed during the load shed period.

iii. Critical Load Registry

- a. A critical load registry of consumers is maintained by Taylor as required by the PUCT. The registry was created by and complies with the PUCT Project 52345. The Critical Load Registry is located in *annex iv, page 17*.

Consumers apply to the critical load registry using the procedures required by the PUCT and the Railroad Commission "RRC" in 16 TAC § 25.52 and 16 TAC § 3.65. RRC Form CI-D is completed and submitted to [REDACTED] bi-annually (March 1 and September 1 of each year). The current critical load registry will be provided with each annual update of the EOP.

System Operators prioritize restoral of power to consumers on the Critical Load Registry. ORLs communicate outages and restoration times to consumers on the Critical Load Registry.

The current Critical Load Registry and Load Shed Plan are in Taylor's System Control. Load shed is performed by System Operators under the supervision of the ORL.

- b. Critical load training is provided to ORLs. ORLs must sign and acknowledge the current Critical Load Registry bi-annually as the registry is updated.

System Operators are responsible for referencing the Critical Load Registry. All System Operators attend and complete System Operator courses. These courses include processes for responding to outages and critical load consumers.

In the event of a critical load emergency, the responding ORL will contact the Director of Marketing & Key Accounts. Director of Marketing & Key Accounts will inform consumers on the Critical Load Registry of any impending or immediate emergency.

iv. Rotating Outages

Taylor will attempt to inform consumers in advance of planned outages; however, during emergencies, outages may be rotated to maintain system integrity.

NOTE: Because curtailment and load shed are dependent on several factors (most significantly, the amount of load that needs to be curtailed) the ORL may have discretion in determining where load shed will best serve Taylor's interest.

(D) Pandemic and Epidemic

Purpose

The intent of this section is to outline Taylor's pandemic and epidemic mitigation efforts.

- i. Employee safety:
 - a. Employees will be trained on safety and health guidelines in accordance with the Center for Disease Control & Prevention.
 - b. High risk employees are identified on a case-by-case basis and accommodations are made dependent on the health risk associated with a pandemic or epidemic.
 - c. High exposure employees will follow protocols requiring social-distancing, adequate PPE, and other necessary precautions to ensure the safety of the employee and the consumer.
 - d. To limit contagion, assigned crews will remain intact.
 - e. PPE including gloves, masks, and sanitizers are provided to employees when applicable to a pandemic or epidemic event. Sanitization of facilities and workstations is performed daily by cleaning staff.
 - f. Employees will be provided cleaning supplies to clean vehicles and workstations.
- ii. Business Continuity:
 - a. Federal, State, and local guidelines/mandates will be followed as applicable.
 - b. Essential personnel have been pre-identified; they are equipped to continue work functions remotely and/or in isolation to sustain business operations.
 - c. ORLs will appoint backup personnel in their respective departments to sustain business operations.
 - d. Consumer interactions are limited for safety of public and Taylor personnel. Payment options are drop-off at any Taylor facility or online transaction.

(E) Wildfire

Purpose

The intent of this section is to outline Taylor's wildfire mitigation efforts related to overhead electrical distribution lines and associated equipment throughout the service territory.

ORL will monitor weather conditions, county emergency management alerts, and state agency advisories regarding drought conditions and Red Flag warnings; sources include:

- Texas A&M Forest (www.texaswildfirerisk.com)
- Texas Forest Service (fire index ratings)
- United States Forest Service fire danger class
- National Weather Service *Red Flag* warnings

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

- i. Preparedness:
 - a) Taylor utilizes a Right of Way crew to inspect and resolve vegetation concerns as standard business practice.
 - b) High fire risk weather circumstances are considered when making on-call lists and work schedules.
 - c) Automatic restoration of lines (reclosing) and energized equipment is disabled during wildfire events, if applicable.
 - d) All Taylor personnel receive hazard recognition training annually. Training includes identifying hazards and proper reporting of those hazards.
- ii. Response:
 - a) First responders are immediately notified of any wildfire event.
 - b) Taylor coordinates with first responders to de-energize the system in affected areas for safety.
 - c) Taylor operations personnel will enter damaged areas to perform repairs once granted by the proper authority.
 - d) On-call list is reviewed to ensure regular rotation of available operations personnel.
 - e) Contractors will be notified and placed on standby.
 - f) Communication will be made as required for public safety.

(F) Hurricane

Taylor is solely located within Texas Division of Emergency Management's "TEMC" regions 4 and 5; neither is within a hurricane evacuation zone as defined by TEMC. In the unlikely event of hurricane related evacuation, Taylor plans to follow guidance from the local Office of Emergency Management.

(G) Cyber Security

Purpose

The intent of this section is to outline Taylor's coordinated response to cyber security incidents.

Taylor's cyber security incident response ensures communication with federal, state, local agencies, consumers, and the media.

Director of Information Technology is responsible for:

- Response and escalation procedures are timely.
- The incident response is reviewed with staff and tested annually.
- Leading the investigation of a suspected breach or reported security incident.
- Reporting to external parties, including pertinent business partners, legal representation, law enforcement, etc., as is required.
- Authorizing on-site investigations by appropriate law enforcement or third-party security/forensic personnel.

Information Technology Department is responsible for:

- Training staff to identify and report a suspected or actual security incident.
- Notifying Director of Information Technology of any reported cyber security incident.
- Investigating and documenting each reported cyber security incident.
- Limiting exposure of sensitive data and reducing associated risks.
- Assisting law enforcement during the investigation process.
- Initiating follow-up actions to reduce likelihood of recurrence, as appropriate.

Taylor personnel are responsible for:

- Identification and reporting a suspected or actual cyber security incident to the Information Technology Department.
- Complying with Taylor security policies and procedures.

(H) Physical Security

Purpose

The intent of this section is to outline Taylor employee's responsibility to identify and report a suspected or actual physical security event at any of Taylor's facilities.

Training

Taylor personnel are trained annually to recognize hostile activities.

- Taylor Personnel are to call police immediately if physical threat warrants
- Taylor Personnel are to avoid the area of a physical security incident until secured by law enforcement.

Reporting

Taylor personnel are responsible for adhering to the reporting procedures for any event that involves:

- Damage of facilities intentionally caused by the Public.
- Physical threats to Taylor's personnel.
- Physical threats to Taylor's facilities.
- A Suspicious device or activity at Taylor's facilities.
- Theft that has the potential to degrade Taylor's operation.

(I) Substation Damage Recovery Plan

Purpose

The intent of this section is to outline Taylor's recovery plan in the event of a substation outage due to weather, accident, or vandalism. This plan is designed to bring one (1) substation transformer back up and running in response to a major outage.

- i. Preparedness:
 - a) ORLs are trained to recognize different response levels as it relates to large outages and substation failures.
 - b) Station inspection forms are used to regularly inspect substations for normal operating conditions.
 - c) Cameras are in place at stations to monitor conditions of severe weather, damage, or vandalism.
 - d) Substation control houses are equipped with SCADA alarms to inform System Control Operators if a door is breached.
 - e) Public information scripts are available for release to inform the public of critical events and plans for restoration.
 - f) Entry and exit of substations is monitored and recorded by System Control
 - g) A mobile substation is available to provide temporary power relief while substation repairs are made as needed.
 - h) A storage building is on site with spare equipment to make quick repairs to substations.
- ii. Response:
 - a) Activate appropriate EOP level depending on severity of incident.
 - b) Attempt to back-feed substation load that was affected to other substation feeders.
 - c) If mobile substation is applicable execute transportation plan per coordination with System Control.
 - d) Contact [REDACTED] per Mutual Aid Agreement plan.
 - e) If applicable, contact law enforcement and file a police report within 24 hours.
 - f) Assess damages to substation and begin implementation of repairs.

- g) Evidence, including photos, will be stored at a secure location regardless of whether vandalism is suspected or not.
- h) Develop long term contingency plan for damaged substation.

(I) Additional Annexes

i. Business Continuity Response

Taylor ORLs will implement a return to normal business operations plan following an emergency event. ORLs return to normal business operations plan includes: replenish availability of supplies/materials, return to normal business hours, conclude all third-party relationships, financial accountability and resource planning.

ii. Reporting Requirements

Taylor reports outages to the PUCT at Outage@PUC.texas.gov as required by 16 TAC § 25.52, as stated below:

"An interruption of any classification lasting one hour or more and affecting the entire system, a major division of the system, a community, a critical load, or service to interruptible consumers; and a scheduled interruption lasting more than four hours that affects customers that are not notified in advance. A significant interruption includes a loss of service to [REDACTED] of the system's consumers ([REDACTED]). A significant interruption also includes interruptions adversely affecting a community such as interruptions of governmental agencies, military bases, universities and schools, major retail centers, and major employers."

Outages are also reported to the National Outage Map at Nationaloutages.com automatically from Taylor's Outage Management System.

iii. Roles and Responsibilities

System Operator

- Notifies operations personnel in the event of an outage.
- Coordinates and directs activities required to restore the electric distribution system during an outage.
- Maintains control of radio traffic ensuring communication for all operations personnel and third-parties.
- Ensures strict adherence to lockout/tagout procedures and three-way communication.
- Ensures Critical Load Registry receive priority status.
- Provides central communication and status updates to the ORL.
- Determines extent of service interruptions by consumer count and 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.

Operations Managers

- Coordinate the logistics and maximizes available crews, equipment, and material.
- Establish a crew rotation plan when restoration of the system is expected to exceed 16 hours.
- Meet with ORL to assist in the development of restoration plans.

Outage Response Leader (ORL)

- Initiates the EOP and has complete responsibility and authority for completing restoration of any emergency in a timely manner.
- ORLs and operations personnel will comply with regulatory guidelines to restore power during an emergency.

Director of Engineering and Operations

- Ensures all communication links are functional and notifies appropriate vendors of repair requirements to two-way radios, SCADA links, etc.
- Provide support to ORLs and System Operators by analyzing outage data and making recommendations for power restoration.
- Monitors location and activity of operations and third-party personnel working on restoration.
- Inventory damaged lines/equipment and coordinate with supplier to ensure required material is available.
- Log location of all damaged devices requiring environmental cleanup.

Member Service Representatives

- Taylor personnel who acknowledge outage phone calls and verify consumer power restoration.
- Assist with prioritizing outage phone calls regarding special needs or the Critical Load Registry.
- Relay information with respect to the extent of damage and anticipated outage restoration, as stated in approved press releases.
- Confirm restoration of power by follow-up phone calls.

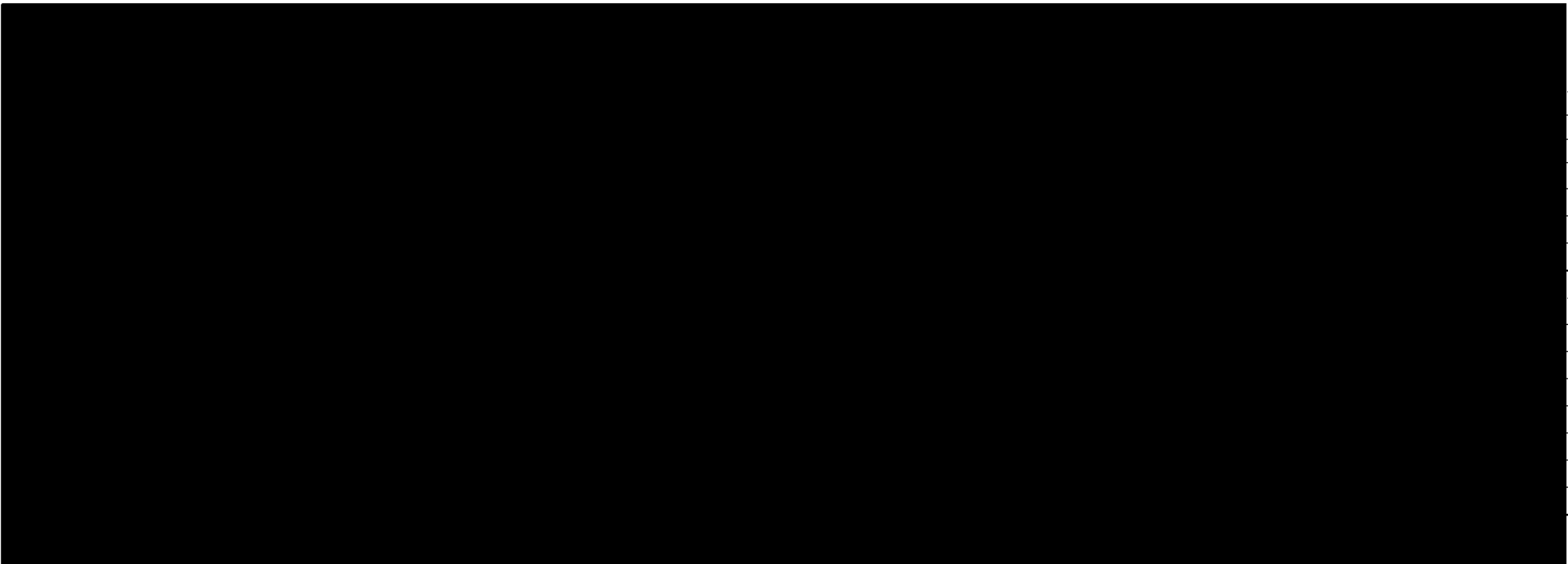
Member Service Manager

- Communicate with key account consumers.
- Ensure Member Service Representatives acknowledge outage phone calls. ORL serves as liaison between system operations and Member Service Representatives.
- Coordinate the assignment of duties to other Taylor personnel to ensure additional needs of consumers and/or personnel are addressed.
- Serves as Taylor's spokesperson during emergency event.
- Prepares appropriate news releases, social media updates, and public service announcements.
- Updates the general manager.

- Ensures Member Service Representatives are provided approved press releases.
- Ensures appropriate regulatory bodies are apprised of outage and restoration efforts, per statutory requirement.

Director of Information Technology

- Ensures the most current cyber security software/hardware is utilized across Taylor's network.
- Routinely performs network security test, phishing attacks, and other cyber security internal testing.
- Manages the documentation and investigation of cyber security incidents.
- Coordinates with law enforcement and third-parties for cyber security incidents.
- Maintains cyber security policies and procedures.
- Provides employee training on cyber security risks and mitigation.



Emergency Events - Subsection (e)(2)

The requirements in this subsection apply to Generation Resource and is not applicable to Taylor.

Emergency Events - Subsection (e)(3)

The requirements in this subsection apply to Retail Electric Provider and is not applicable to Taylor.

Drills - Subsection (f)

The following subsection identifies drill requirements:

- At least one drill per year.
- Review effectiveness of the drill.
- Implement changes to EOP if needed.

Taylor will notify the Public Utility Commission of Texas and the Texas Division of Emergency Management of the following at least 30 days prior to conducting a drill:

- Date
- Time
- Location

Taylor will perform at least one drill annually if an emergency event does not occur.

Reporting Requirements - Subsection (g)

During an activation of the State Operation Center by TDEM, Taylor will provide updates on the status of operations, outages, and restoration efforts to PUCT. Taylor will continue reporting all incident-related outages until outages are restored, unless otherwise notified by PUCT.

Following an emergency event or drill, Taylor will hold a meeting to discuss lessons learned. A report detailing the emergency event or drill, effectiveness of the EOP, Taylor's overall response, and recommended changes will be generated. Taylor will provide the lessons learned report to the PUCT, if requested.

Signed Affidavit – Subsection (h)

I, [REDACTED] affirm that key operating personnel are familiar with and have received training on the contents of the EOP and are committed to following the EOP. I have reviewed the EOP and will delegate drills being performed on a yearly basis. If needed, our compliance department will distribute to local jurisdictions. If any type of an emergency occurs personnel will develop a specific return to normal operations path. This path will be developed and followed after any disruption caused by incident or emergency. The Emergency personnel who are designated to interact with local, state, and federal emergency management officials during an emergency have received National Incident Management System training; IS-100.c, IS-200.c, IS-700.b, IS-800.d.

