



## Filing Receipt

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## Affidavit for Emergency Operations Plan

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### AFFIDAVIT OF Aaron Zubaty

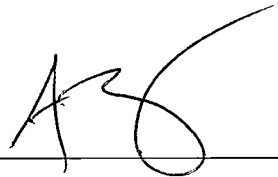
BEFORE ME, the undersigned authority, on this day appeared Aaron Zubaty who being by me first duly sworn, on oath, deposed and said the following:

1. I am the highest-ranking representative, official, or officer with binding authority over Chisholm Grid, LLC. Chisholm Grid, LLC is a registered power generation company. I have personal knowledge of the facts stated in this affidavit and they are true and correct.
2. I am familiar with Chisholm Grid, LLC's Emergency Operations Plan ("EOP") and the executive summary of the EOP being filed with the Public Utility Commission of Texas in accordance with P.U.C. Substantive Rule 25.53.
3. The EOP contains confidential, security-sensitive information requiring filing under seal in accordance with P.U.C. Procedural Rule 22.71(d). The EOP is also Protected Information under the ERCOT Protocols.
4. As required by P.U.C. Substantive Rule 25.53(d)(C)(i), I affirm that all relevant operating personnel within Chisholm Grid, LLC are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
5. As required by P.U.C. Substantive Rule 25.53(d)(C)(ii), I affirm that the EOP has been reviewed and approved by the appropriate executives.
6. As required by P.U.C. Substantive Rule 25.53(d)(C)(iii), I affirm that a drill will be conducted this calendar year, in accordance with P.U.C. Substantive Rule 25.53(f). However, as this is a new requirement only recently adopted, the drill will not be completed by April 15, 2022.
7. As required by P.U.C. Substantive Rule 25.53(d)(C)(iv), I affirm that the EOP or an appropriate summary has been distributed to local jurisdictions as needed.
8. As required by P.U.C. Substantive Rule 25.53(d)(C)(v), I affirm that Chisholm Grid, LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
9. As required by P.U.C. Substantive Rule 25.53(d)(C)(vi), I affirm that Chisholm Grid, LLC's emergency management personnel who are designated to interact with

## **Affidavit for Emergency Operations Plan**

local, state, and federal emergency management officials during emergency events will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training this year. However, as this is a new requirement only recently adopted and our team is transitioning operations personnel due to a recent employee departure, the training will not be completed by April 15, 2022.

Further affiant sayeth not.



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**CALIFORNIA JURAT**

**GOVERNMENT CODE § 8202**

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

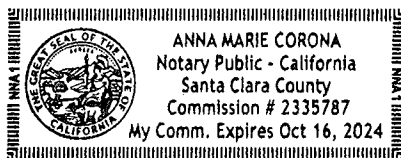
State of California

County of SAN MATEO

Subscribed and sworn to (or affirmed) before me on

this 15 day of April, 2022, by  
Date Month Year

(1) AARON ZUBATY



(and (2) N/A),  
Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature [Signature]  
Signature of Notary Public

Place Notary Seal and/or Stamp Above

**OPTIONAL**

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

## 1.0 POWER GENERATION COMPANY INFORMATION

PGC Name and Number	Generating Facility Name
Chisholm Grid, LLC (PGC20606)	Chisholm Grid, LLC

## 2.0 EXECUTIVE SUMMARY - EOP CONTENTS

### 2.1 Summary of Emergency Operations Annex

The *Emergency Operations Annex* is the over-arching document that sets the policies for severe weather planning, identification of equipment critical failure points, identification of business continuity critical failure points for personnel, restoration of services, and training and drill requirements. This Annex also contains the general emergency site procedures (e.g. evacuation, personnel injuries and treatment, fire and hazardous material response, and suspected threats or sabotage).

### 2.2 Summary of Pandemic and Epidemic Preparedness Annex

The *Pandemic and Epidemic Annex* serves as the annex for maintaining essential functions and services during a pandemic. This document addresses the specialized continuity planning required by addressing considerations, challenges, and elements specific to the dynamic nature of a pandemic or epidemic. The Annex defines a crisis team that is responsible for evaluation and assessment, as well as the development of response actions and communications.

### 2.3 Summary of Hot Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme hot weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

### 2.4 Summary of Cold Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme cold weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

### 2.5 Cyber and Physical Security Incident Annex

This annex is specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents. The

annex addresses how to identify potential physical or cyber indicators of an incident, and how to escalate, investigate, and report a potential or actual incident.

### 3.0 EXECUTIVE SUMMARY – DOCUMENT AND REQUIREMENTS MAPPING


Requirement	Addressed in document	Where it is addressed in the document
<b>(d) Information to be included in the emergency operations plan</b>		
(1)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> <li>• 1.2 Applicability</li> <li>• 1.3 Statements of §25.53 Non-Applicability</li> </ul>
(1)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> <li>• B. Roles and Responsibilities (p. 5)</li> </ul>
(1)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> <li>• D. Revision Control Summary (p. 7)</li> </ul>
(1)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> <li>• D. Revision Control Summary (p. 7)</li> </ul>
(1)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation <ul style="list-style-type: none"> <li>• C. Approvals (p. 7)</li> </ul>
(2)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> <li>• 1.2 Applicability</li> <li>• 1.3 Statements of §25.53 Non-Applicability</li> </ul>
(2)(B)	Emergency Operations Plan	Section 2.0 Communication Plan (p. 7)
(2)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> <li>• 1.2 Applicability</li> <li>• 1.3 Statements of §25.53 Non-Applicability</li> </ul>
(2)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> <li>• 1.2 Applicability</li> <li>• 1.3 Statements of §25.53 Non-Applicability</li> </ul>
(3)	Emergency Operations Plan	<ul style="list-style-type: none"> <li>• Section 3.0 Plan for Pre-Identified Supplies for Emergency Use (p. 8)</li> </ul>
	Cold Weather Annex	5.0 Cold Weather Preparation and Response Processes (p. 7) <ul style="list-style-type: none"> <li>• 5.1 Cold Weather Equipment Inventory List (p. 7)</li> <li>• 5.4 Post-Event and Annual Review (p. 8)</li> <li>• Attachment 4: Cold Weather Equipment Inventory (p. 18)</li> <li>• Attachment 5: Pre-Winter Checklist (p. 19)</li> <li>• Attachment 7: Extreme Cold Weather Checklist (p. 21)</li> </ul>
	Hot Weather Annex	5.0 Hot Weather Preparation and Response Processes (p. 8)

Requirement	Addressed in document	Where it is addressed in the document
		<ul style="list-style-type: none"> <li>• 5.1 Hot Weather Equipment Inventory List (p. 8)</li> <li>• 5.4 Post-Event and Annual Review (p. 9)</li> <li>• Attachment 4: Hot Weather Equipment Inventory (p. 20)</li> <li>• Attachment 5: Pre-Summer Checklist (p. 21)</li> <li>• Attachment 7: Extreme Hot Weather Checklist (p. 23)</li> </ul>
(4)	Emergency Operations Plan	<ul style="list-style-type: none"> <li>• Section 4.0 Plan to Address Staffing During Emergency Response (p. 9)</li> <li>• Section 8.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 10)</li> </ul>
	Cold Weather Annex	<ul style="list-style-type: none"> <li>• 5.6 Additional Staffing Considerations for Weather Events (p. 8)</li> <li>• Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 8)</li> <li>• Attachment 6: Pre-Event Checklist (p. 20)</li> </ul>
	Hot Weather Annex	<ul style="list-style-type: none"> <li>• 5.6 Additional Staffing Considerations for Weather Events (p. 10)</li> <li>• Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 10)</li> <li>• Attachment 6: Pre-Event Checklist (p. 22)</li> </ul>
	Pandemic and Epidemic Annex	Section 5.0 Essential Roles and Personnel (p. 5)
(5)	Emergency Operations Plan	<ul style="list-style-type: none"> <li>• Section 5.0 Identification of Weather-Related Hazards (p. 9)</li> <li>• Section 6.0 Process for Activating the EOP (p. 9)</li> </ul>
(6)	Cold Weather Annex, Hot Weather Annex, Cyber and Physical Security Incident Annex, Pandemic and Epidemic Annex	<ul style="list-style-type: none"> <li>• Cold Weather Annex</li> <li>• Hot Weather Annex</li> <li>• Cyber and Physical Security Incident Annex</li> <li>• Pandemic and Epidemic Annex</li> </ul>
<b>(e) Annexes to be included in the emergency operations plan</b>		
(1)(A thru I)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> <li>• 1.2 Applicability</li> <li>• 1.3 Statements of §25.53 Non-Applicability</li> </ul>
(2)(A)(i)	Cold Weather Annex	Entire document
	Hot Weather Annex	Entire document
(2)(A)(ii)	Cold Weather Annex	Section 1.0 Approval and Implementation (p. 3) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> </ul>
	Hot Weather Annex	Section 1.0 Approval and Implementation (p. 3) <ul style="list-style-type: none"> <li>• 1.1 Introduction</li> </ul>
(2)(A)(iii)	Cold Weather Annex	<ul style="list-style-type: none"> <li>• 5.4 Post-Event and Annual Review (p. 7)</li> <li>• Attachment 5: Pre-Winter Checklist (p. 19)</li> </ul>

Requirement	Addressed in document	Where it is addressed in the document
	Hot Weather Annex	<ul style="list-style-type: none"> <li>Attachment 7: Extreme Cold Weather Checklist (p. 21)</li> <li>5.4 Post-Event and Annual Review (p. 9)</li> <li>Attachment 5: Pre-Summer Checklist (p. 21)</li> <li>Attachment 7: Extreme Hot Weather Checklist (p. 23)</li> </ul>
(2)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>1.3 Statements of §25.53 Non-Applicability</li> </ul>
(2)(C)	Emergency Operations Plan	Section 10.0 Restoration of Service (p. 13) <ul style="list-style-type: none"> <li>10.1 Failure to Start or Tipping Off-line</li> <li>10.2 Response Time and Backup Power</li> </ul>
(2)(D)	Pandemic and Epidemic Annex	Entire document
(2)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>1.3 Statements of §25.53 Non-Applicability</li> </ul>
(2)(F)	Cyber and Physical Security Incident Annex	Entire document
(2)(G)	Cyber and Physical Security Incident Annex	Entire document
(3)(A thru E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>1.1 Introduction</li> <li>1.2 Applicability</li> <li>1.3 Statements of §25.53 Non-Applicability</li> </ul>
(4)(A thru F)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 4) <ul style="list-style-type: none"> <li>1.1 Introduction</li> <li>1.2 Applicability</li> <li>1.3 Statements of §25.53 Non-Applicability</li> </ul>

#### 4.0 RECORD OF DISTRIBUTION AND TRAINING

This table presents information, as required, of the persons in the entity's organization receiving access to and training on the EOP, as appropriate.

Organization Name	Individual Name	Title	Date(s) of Distribution, Access, or Training on EOP
			4/15/2022
			4/15/2022
			4/15/2022
			4/15/2022
			4/15/2022

Organization Name	Individual Name	Title	Date(s) of Distribution, Access, or Training on EOP

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## 1.0 APPROVAL AND IMPLEMENTATION SECTION

### A. Introduction and Applicability

#### 1.1 Introduction

This *Emergency Operations Plan* provides the policies and processes for Chisholm Grid, LLC (Chisholm), a Power Generation Company (PGC) Public Utilities Commission of Texas (PUCT), to follow during emergency operations in accordance with the requirements of Chapter 25, Subchapter C, §25.53, of the Electric Substantive Rules.

This EOP addresses the requirements in *(d) Information to be included in the emergency operations plan*. Within this and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

#### 1.2 Applicability

This EOP, including all attachments and annexes, applies to and will be used by Chisholm, registered with the PUCT as PGC20606.

#### 1.3 Statements of §25.53 Non-Applicability

Section	Statement of Non-Applicability
(e)(2)(A)(ii) Adequacy and operability of fuel switching equipment	Chisholm does not have the capability to perform fuel switching and has no installed equipment to do so.
(e)(2)(B) Water Shortage Annex	Chisholm does not utilize water in the generation of electricity.
(e)(2)(E) Hurricane Annex	Chisholm is not located in a hurricane evacuation zone (as defined by the Texas Division of Emergency management (TDEM) <sup>1</sup>

#### 1.4 Generation Resource Information and Location

Chisholm is a stand-alone Battery Energy Storage System (BESS) Facility located in Tarrant County, Texas and is interconnected to the 138 kV Hicks Station. The site is designed to be unmanned with operations and maintenance (O&M) technicians dispatched as needed to respond to site events as well as perform routine, regular maintenance activities.

<sup>1</sup> <http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf>

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Res America Asset Management – Chisholm is the registered Generator Operator (GOP) and maintains a third-party agreement with Custom Energy Solutions (CES) to perform 24x7 control center operations. Res America Asset Management, Inc. (Res) is contracted as the O&M provider.

Facility	ERCOT Resource Name	Nameplate Rating	Commercial Operations Date
Chisholm Grid, LLC (Trade/Commercial Name: Chisholm Grid)	CHISMGRD_RN	100 MW	10/1/2021

### B. Roles and Responsibilities

#### 1.5 Personnel

1.5.1 Role – Anyone with authorized physical access to the Chisholm BESS Facility for the purposes of performing work, including O&M contractors and any other vendors.

1.5.2 Responsibilities include:

- Follow this Plan, along with supporting plans and procedures, required to perform work for Chisholm.
- Provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Support response to emergency events at the Chisholm Facility.
- Participate in training and drill/exercises, as appropriate.
- Participate in post-incident reviews, as appropriate.
- Provide evidence to the Facility Manager.

#### 1.6 Compliance Manager

1.6.1 Role – The Chisholm compliance manager and owner of this plan.

1.6.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Chisholm 's business objectives and addresses requirements. The PUCT requires that this EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.

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- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in the EOP are completed, in concert with the Facility Manager.
- Reviews and approves this Plan annually.
- Maintains evidence.

**1.7 Facility Manager**

1.7.1 Role – the representative of the third-party vendor contracted to manage the performance of O&M services at the Chisholm Facility.

1.7.2 Responsibilities include:

- Ensure the requirements and processes laid out in the EOP are followed by Personnel.
- Lead Personnel in the execution of the EOP and set expectations with Personnel for the safe and reliable operational performance of the facility.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Oversee the day-to-day operation of the Chisholm facility.
- Ensure annual drill requirements are met and submit evidence to Chisholm upon completion and request.
- Schedule training and drills for relevant operating personnel and submit evidence to Chisholm by the end of each calendar year.
- Participate in training and drills.
- Provide evidence to Compliance Manager upon completion and request.

**1.8 Field Services**

1.8.1 Role – Contracted to perform the O&M services at the Chisholm Facility.

1.8.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to the Facility Manager and Compliance Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-incident reviews.

**1.9 Operating Personnel**

1.9.1 Role – The registered Generator Operator (GOP) for the Chisholm facility.

D. Revision Control Summary

Version	Effective Date	Author	Description of Changes
With each new effective date and version entry, the previous EOP version is superseded.			
1.0	8/13/2021	GridSME, Eolian, Able Grid, Res America (O&M), and Res America Asset Management - Chisholm (GOP)	New plan prior to COD
2.0	4/15/2022	GridSME, Chisholm and Res America	Updated EOP content to address new Section 25.53 prior to 4/18 filing deadline.

2.0 COMMUNICATION PLAN

The table below covers all of the entities that are required under (d)(2)(B) that Chisholm, as an entity with generation operations, may communicate with as applicable to its entity.

The entity’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events must have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System

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training.

Entity	Statement of applicability for PGC	Communication Procedure
Media	PGC does not authorize communication with the media by Chisholm or its supporting personnel.	PGC does not authorize communication with the media by Chisholm or its supporting personnel.
PUCT	PGC may need to respond to requests for information by commission staff.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Office of Public Utility Council (OPUC)	PGC is unlikely to need to respond to requests for information.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Fuel Suppliers	As a BESS facility, the PGC does not utilize fuel suppliers.	Not Applicable to the PGC
Local & State Governmental Entities, officials, and emergency operations center	PGC may need to respond to requests for information.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Reliability Coordinator (RC)	The PGC may need to communicate with the RC, as requested.	As described in the Roles and Responsibilities section of the EOP, only Operating Personnel may communicate with the RC.

### 3.0 PLAN FOR PRE-IDENTIFIED SUPPLIES FOR EMERGENCY USE

Each of the annexes applicable to the PGC, including the *Cold Weather Annex* and *Hot Weather Annex*, contain a list of supplies that are unique to the content of the annex and are completed pre-season and/or pre-event. The plan for identifying and maintaining supplies is to utilize the checklists pre-and during season, as needed, to account for and stock supplies.

The plan for identifying and maintaining supplies is to utilize the checklists pre-and during season, as needed, to account for and stock supplies.

The Cyber and Physical Security Incident Annex does not require pre-identified supplies. If the need arises during a cyber or physical security incident to obtain supplies, then the Site Manager and the Compliance Manager will coordinate to obtain them.

The Pandemic and Epidemic Annex contains a planning assumption that additional funding will be made available for the acquisition of necessary equipment. Based on the recommendations

#### 4.0 PLAN TO ADDRESS STAFFING DURING EMERGENCY RESPONSE

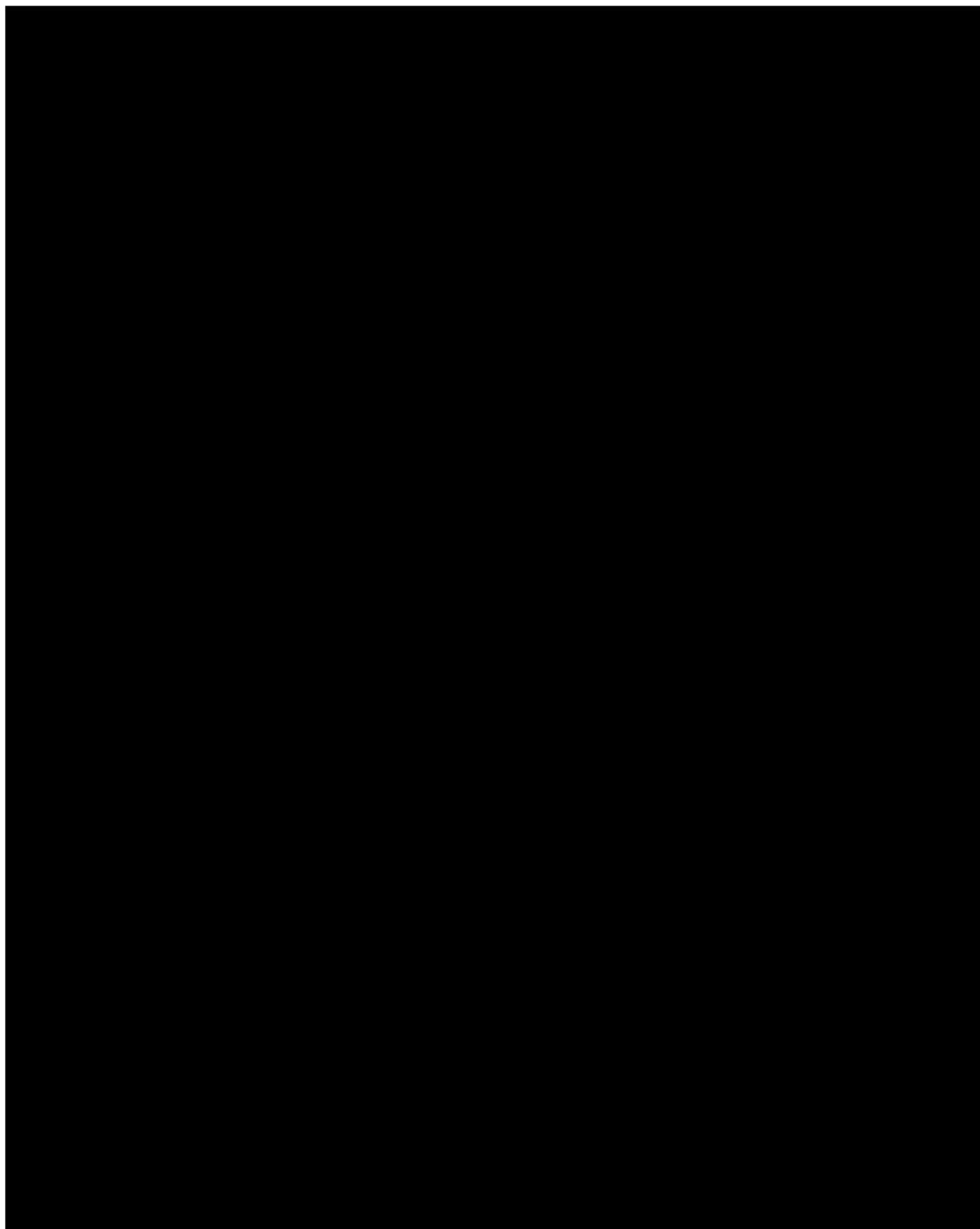
## 5.0 IDENTIFICATION OF WEATHER-RELATED HAZARDS

## 6.0 PROCESS FOR ACTIVATING THE EOP

## 7.0 CRITICAL FAILURE POINTS - EQUIPMENT

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## 9.0 SEVERE WEATHER PLANNING AND IDENTIFICATION

The City of Fort Worth, in Tarrant County, is included in the Tarrant County Hazard Mitigation Action Plan (HazMAP).<sup>2</sup> The HazMAP identifies nine (9) natural hazards having the potential to cause damage, and provides the following ranking of each hazard for Fort Worth. Section L-1 of the HazMap is the Jurisdictional Annex specific to the City.

### 3.3 Natural Hazard Profiles

The City of Fort Worth's Local Planning Team (LPT) ranked potential hazards in order of risk, with 1 being the highest. Risk, for the purposes of hazard mitigation planning, is the potential for damage or loss created by the interaction of natural hazards with community assets. If a natural hazard does not and could not impact the City of Fort Worth in any way, not applicable (N/A) is used as its rank and its reasoning is noted in the hazard profile section of this chapter.

Rank of Risk	Natural Hazard
1	Thunderstorm (includes hail, wind, lightning)
2	Flooding
3	Winter Storms
4	Tornado
5	Wildfire
6	Extreme Heat
7	Drought
8	Expansive Soils
9	Earthquake

The City of Fort Worth maintains a *Floodplain Management Plan*,<sup>3</sup> which describes the City's climate as, "...humid subtropical with hot summers and winters with short periods of extreme cold. The area experiences a wide annual temperature range, according to the National Weather Service. The mean temperatures in the City range from 96° F in the summer and 35° F in the winter. On average, the City receives approximately 38 inches of precipitation annually." While there is a Risk Ranking of 2 for flooding, there has been no damage reported since 2015 within the City to roads and critical infrastructure. Thunderstorms carry the highest Risk Ranking of 1, with an extensive area affected, with major extent and a highly likely probability of future occurrence. Damage caused since 2015 due to high winds and hail in thunderstorms, is in the millions of dollar's worth.

The City maintains an Outdoor Warning System,<sup>4</sup> which may be activated for any kind of emergency, including weather.

### 9.1 Monitoring and Identification Responsibilities

<sup>2</sup> <https://www.fortworthtexas.gov/departments/emo>

<sup>3</sup> <https://www.fortworthtexas.gov/files/assets/public/tpw/documents/floodplain-managment-plan.pdf>

<sup>4</sup> <https://www.fortworthtexas.gov/departments/emo/services/sirens>

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Events and disturbances that can occur in and around the facility include but are not limited to windstorms, severe thunderstorms, flooding, tornadoes, excessive heat, excessive cold, snowstorms, and ice storms. These weather events can be detrimental to personnel and/or equipment and structures at the facility. Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization annexes, to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those annexes.

Post-event, the Facility Manager and Field Services will assess the damage and report the current generating capability of the site (priority for recovery of generation capacity) to Operating Personnel.

## **9.2 Pre-season planning**

Ahead of each summer and winter season, the Facility Manager ensures that the appropriate weatherization annex is reviewed, and the pre-season preparedness checklists are completed, signed, and provided to the Compliance Manager. Annual review of the checklists is documented and stored in specified database or information repository. This activity coincides with the required ERCOT reporting, per the Nodal Protocols. Checklists specific to the *Cold Weather Annex* and *Hot Weather Annex* are contained within those specific documents. For event response checklists for other scenarios, see the appropriate Attachment included in this EOP.

## **9.3 Seasonal events**

Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Facility Manager monitors weather forecasts for the site and is responsible for making notifications necessary to ensure severe weather preparations and communicating with Personnel and the GOP. The Facility Manager will ensure the appropriate plans and checklists are utilized for severe weather planning and response.

When information is received that a severe weather event such as a tornado, severely hot or cold weather, or a flood watch has been issued for the facility area, the following actions shall be taken:

1. The on-site Field Services should notify the Facility Manager.
2. The Facility Manager or Operating Personnel shall determine, in consultation with the Compliance Manager if time permits, whether or not the facility should be shut down due to the potential weather event(s).

The *Cold Weather Annex* and *Hot Weather Annex* contain the inventory of pre-arranged supplies needed for emergencies. These annexes are separate documents from this EOP.

## **9.4 Personnel Safety**

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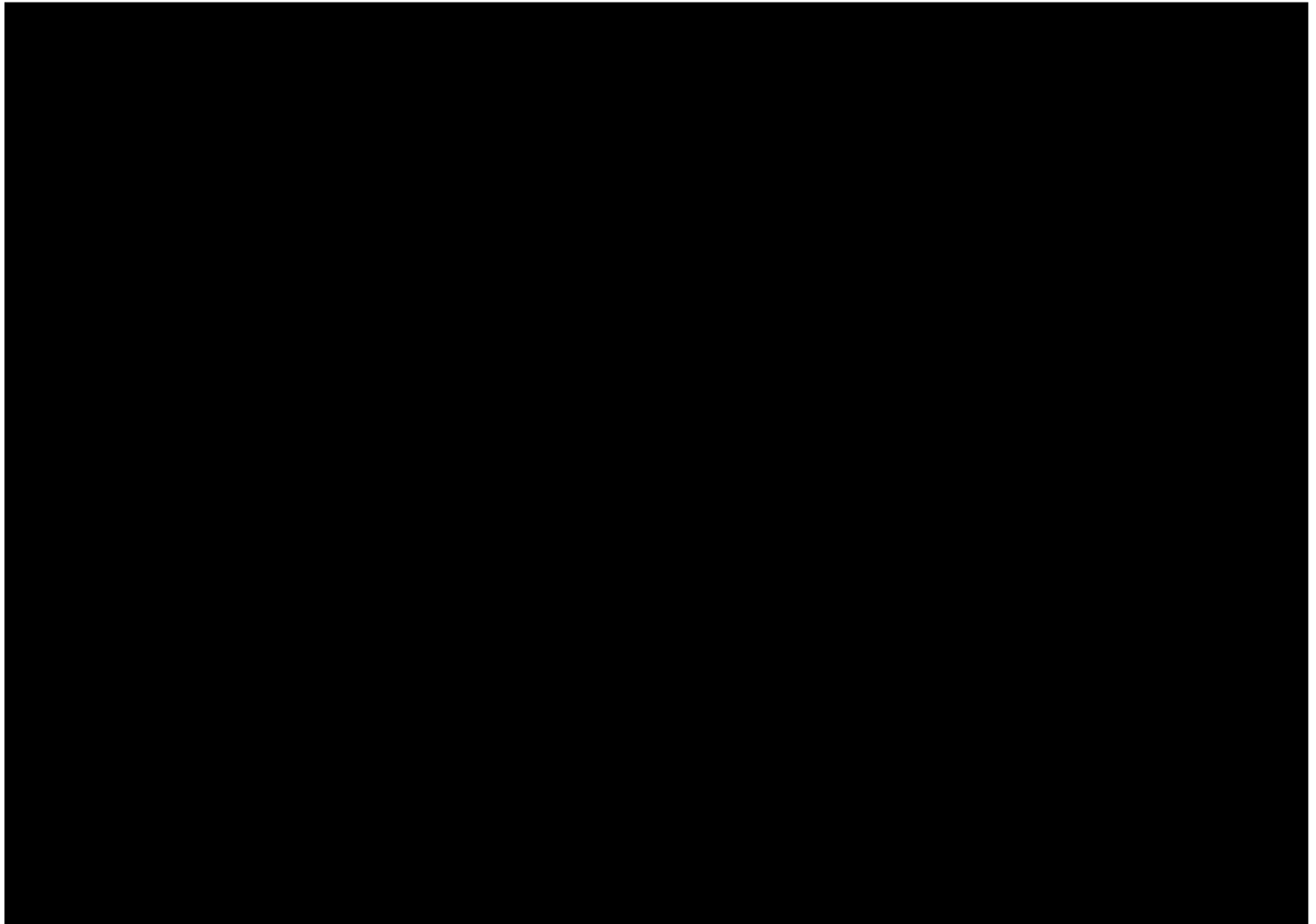
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If shelter-in-place is necessary for an unanticipated weather event, Personnel should seek shelter in their vehicle as appropriate to the event. Personnel should remain sheltered if the severe weather is affecting the immediate area and maintain communications with the Facility Manager, Operating Personnel, and others.

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**10.0 RESTORATION OF SERVICE**

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**11.0 REQUIRED EOP DRILL**

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**11.1 Requirement for an Annual Drill and EOP Update**

The PUCT requires that Chisholm conduct or participate in one or more drills each calendar year to test its EOP.

Following an annual drill the entity must assess the effectiveness of its emergency response and revise its EOP, as needed. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

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**11.2 Notification to PUCT and TDEM District Coordinators Prior to Conducting Annual Drill**

At least 30 days prior to the date of at least one drill each calendar year the following notifications must be made of the 1) date, 2) time, and 3) location of the drill.

- Commission staff must be notified (using the method and form prescribed on the commission's website).
- Appropriate TDEM District Coordinators, by email or other written form.

**11.3 Drill Requirements**

11.3.1 The content of each drill will be based on current needs and will be determined by the Facility Manager with input from the Compliance Manager.

11.3.1.1 The annual drill must include a documented evacuation of the O&M/Substation control building (if applicable).

11.3.2 A roster of drill attendees, the date the drill was conducted, and the location of the drill will be filed with this plan and retained in the Chisholm document repository.

11.3.3 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provide to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

**11.4 EOP Updates**

11.4.1 Following the annual drill, the effectiveness of the drill and the EOP will be assessed by Compliance Manager and the EOP updated, as needed, based on feedback received and provided to the Compliance Manager.

11.4.2 Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the Chisholm EOP evidence.

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**12.0 ANNUAL TRAINING AND REPORTING REQUIREMENT**

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The PUCT requires that all relevant operating personnel be familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

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All relevant operating personnel (inclusive of appropriate Chisholm employees, O&M personnel, appropriate vendors, and GOP personnel) will receive training each calendar year. The Compliance Manager will provide EOP overview training to Res, Facility Manager(s), and others, as appropriate. All relevant operating personnel who will enter operating areas of the facility will be provided a site orientation and procedure overview, which will include mustering locations and evacuation procedures.

At the end of each calendar year, the Facility Manager will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and
2. Dates of access to or training on the EOP, as appropriate

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### 13.0 FILING OF EMERGENCY CONTACT INFORMATION WITH THE PUCT

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Chisholm is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, Chisholm must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form. See *Resources and Related References* Section for Emergency Contact Annual Report and Form links.

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### 14.0 REQUIRED ANNUAL PLAN UPDATE

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The Filing Requirements in §25.53 required that information in this EOP and all supporting documents must be updated annually, and no later than March 15, for various circumstance, including, but not limited to the following:

- Changes were made in the previous calendar year that will materially affect how Chisholm would respond in an emergency.
- An entity that in the previous calendar year did not make a change that materially impacts how Short would respond must also file with the PUCT.

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### 15.0 REQUIRED REPORTING

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#### 15.1 Requirement to update EOP Information no later than March 15 Annually

Chisholm is required to continuously maintain its EOP and must annually updated information within the EOP no later than March 15.

- 15.1.1 If EOP changes were made in the previous calendar year that materially affects how Chisholm would respond to an emergency, the following items must be completed:

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15.1.1.1 File an executive summary with the commission;

15.1.1.2 File a complete, revised copy of the EOP with all confidential portions removed; and

15.1.1.3 Submit to ERCOT the revised unredacted EOP in its entirety.

15.1.2 If no EOP changes were made in the previous calendar year that materially affect how it would respond to an emergency, the following items must be completed:

15.1.2.1 A pleading that documents any changes to the list of emergency contacts, as required;

15.1.2.2 An attestation stating that no changes were made to the EOP that materially affects how it would respond to an emergency; and

15.1.2.3 The required affidavit.

If commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency, Chisholm will update the EOP and, if directed by commission staff, file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.

### 15.2 Reporting During Activation of the State Operations Center by TDEM

Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.

### 15.3 ERCOT Requirement for Annual Weatherization Declaration Submittals

Chisholm is required to submit declarations for both summer and winter weatherization preparations, per the Nodal Protocols, Section 22 (Attachment K and Attachment O).

Summary Table of Annual Weatherization Declaration Filing Requirements	
What must be filed:	Filing due date:
Summer Declaration, Attachment K	No earlier than May 1 and no later than June 1
Winter Declaration, Attachment O	No earlier than November 1 and no later than December 1

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## 16.0 RESOURCES AND RELATED REFERENCES

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Chisholm Cyber and Physical Security Incident Annex

Chisholm Cold Weather Annex

Chisholm Hot Weather Annex

Chisholm Pandemic and Epidemic Annex

### City of Fort Worth

Emergency Management Department: <https://www.fortworthtexas.gov/departments/emo>

- **Hazard Mitigation Action Plan Annex:** HazMAP may be downloaded from the above website under “Hazard Mitigation”.

**Flood Safety and Stormwater Management:** [http://fortworthtexas.gov/stormwater/flood-safety/?\\_gl=1\\*\\_mss54e\\*\\_ga\\*\\_MTQ3NTE4MTQxNi4xNjQ5MTA5MjY2\\*\\_ga\\_R90X60M8G9\\*\\_MTY0OTewOTI2NS4xLjEuMTY0OTExMDM3My4w](http://fortworthtexas.gov/stormwater/flood-safety/?_gl=1*_mss54e*_ga*_MTQ3NTE4MTQxNi4xNjQ5MTA5MjY2*_ga_R90X60M8G9*_MTY0OTewOTI2NS4xLjEuMTY0OTExMDM3My4w)

### Tarrant County Emergency Management:

<https://www.tarrantcounty.com/en/administration/staff/county-emergency-management-coordinator.html?linklocation=Administrators%20Staff&linkname=Emergency%20Management%20Manager>

### ERCOT

Resource Entities webpage: <http://www.ercot.com/services/rq/re>

Current Protocols - Nodal: <http://www.ercot.com/mktrules/nprotocols/current>

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination for Resource Entities with Natural Gas Generation Resources**
- **Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations**

### PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

<https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx>

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Information (posted under Emergency Management section):

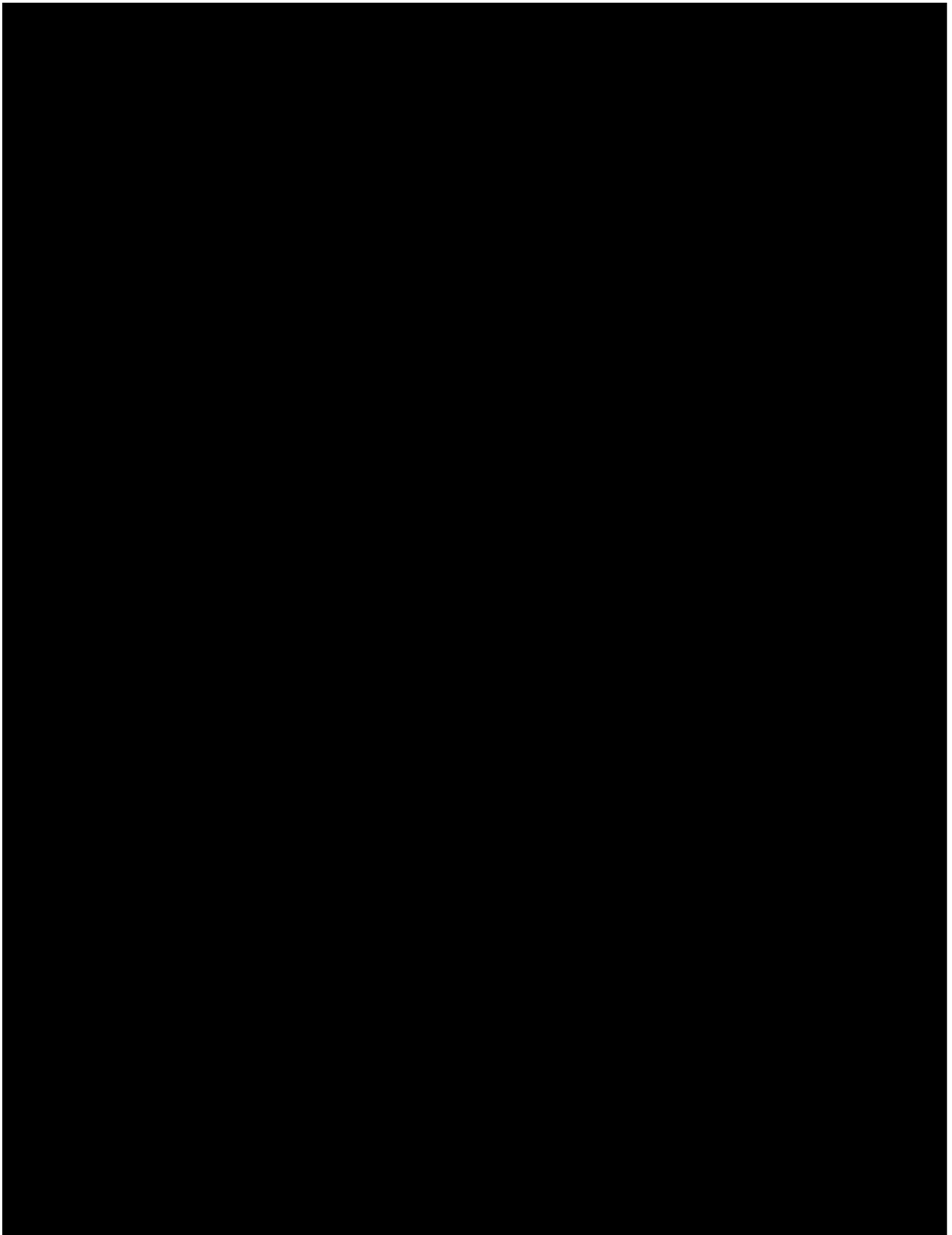
<https://www.puc.texas.gov/industry/electric/forms/>

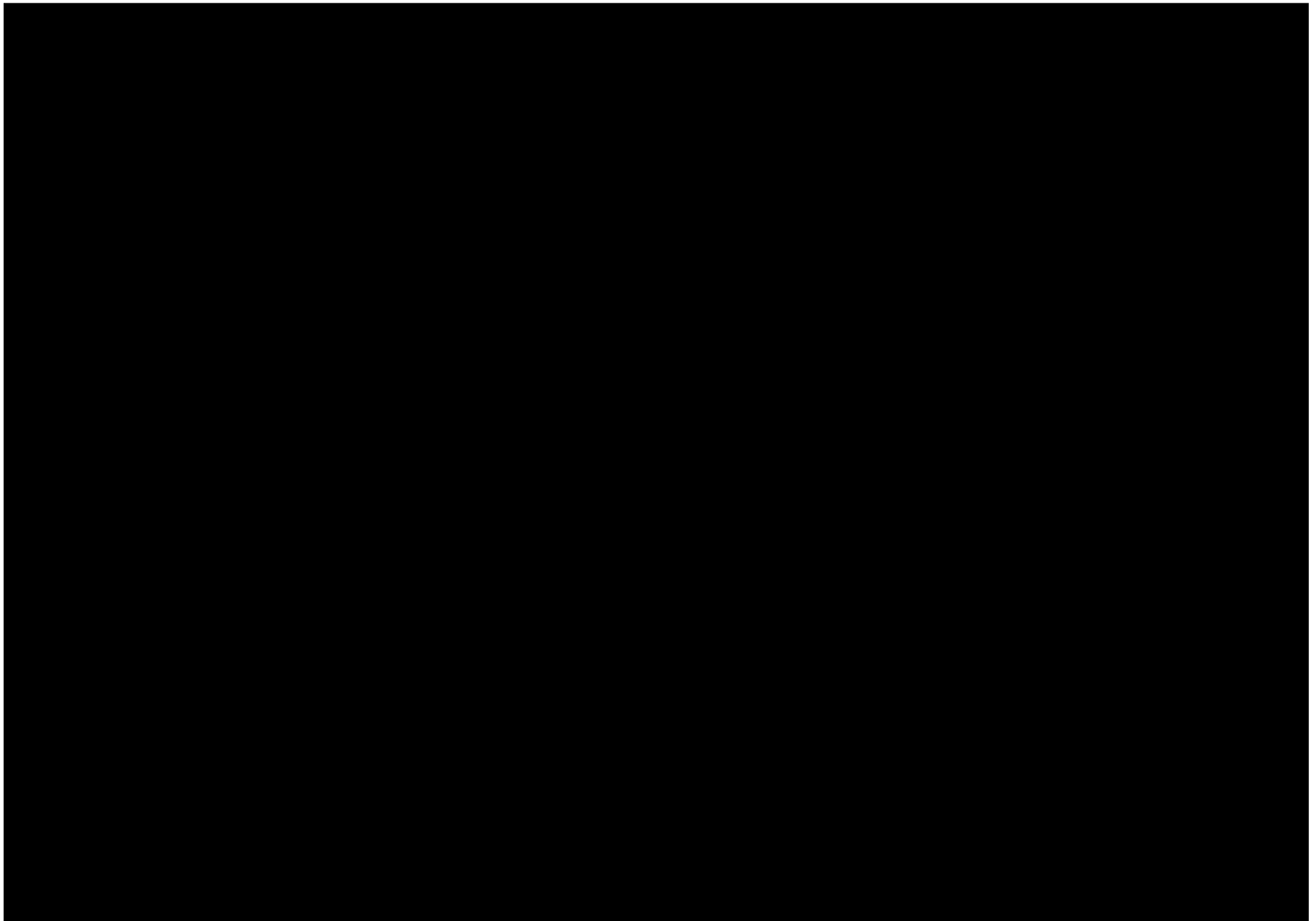
## 17.0 SECTION 25.53 DEFINITIONS

Term	Definition
<b>Annex</b>	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
<b>Drill</b>	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
<b>Emergency</b>	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
<b>Entity</b>	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<b>Hazard</b>	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
<b>Threat</b>	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

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**General Emergency Procedures**

This emergency plan was developed for the following plausible contingencies that could transpire at the facility:

1. Personnel injuries and serious health conditions
2. Fires
3. Chemical releases
4. Weather-related causes
5. Threats to the facility that warn of danger to personnel
6. Pandemics
7. Sabotage Reporting
8. Other unanticipated events

The facility is designed to be unmanned and emergency events may occur while no personnel are on site. In the case that no personnel are on site, the Facility Manager will notify trained emergency responders as needed. The Facility Manager will then notify Compliance Manager and determine if and when the site can be safely visited by personnel for inspections, remediation, and coordination with trained emergency responders as needed. The remaining

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plans are to be followed as applicable if no personnel are on site (e.g., evacuation will not be necessary if no personnel are on site.)

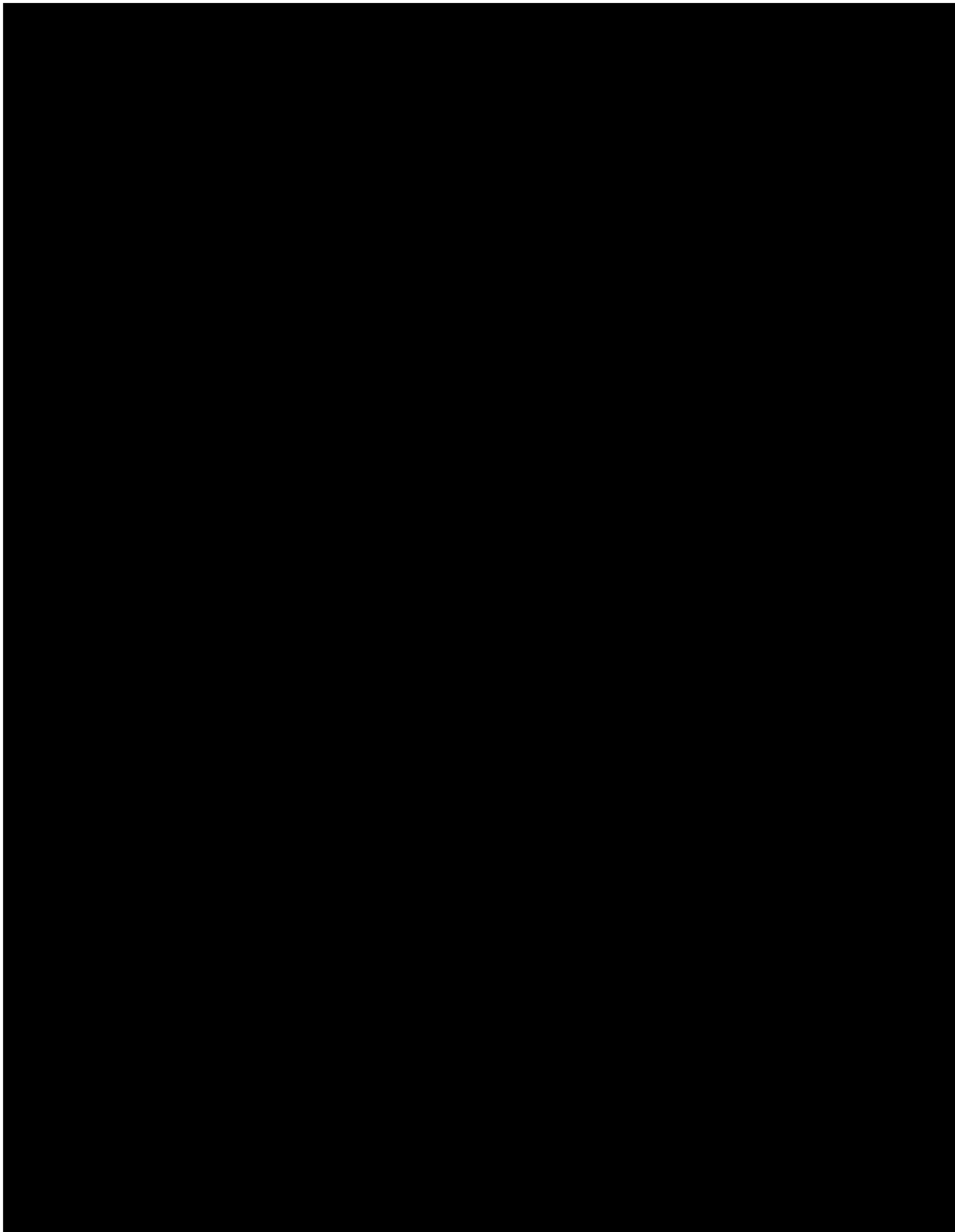
It will be the responsibility of the Person-in-Charge<sup>5</sup> to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages. In the event of an emergency, the following actions will be immediately performed:

**If the event is a fire, medical, or police emergency, contact 911 immediately.**



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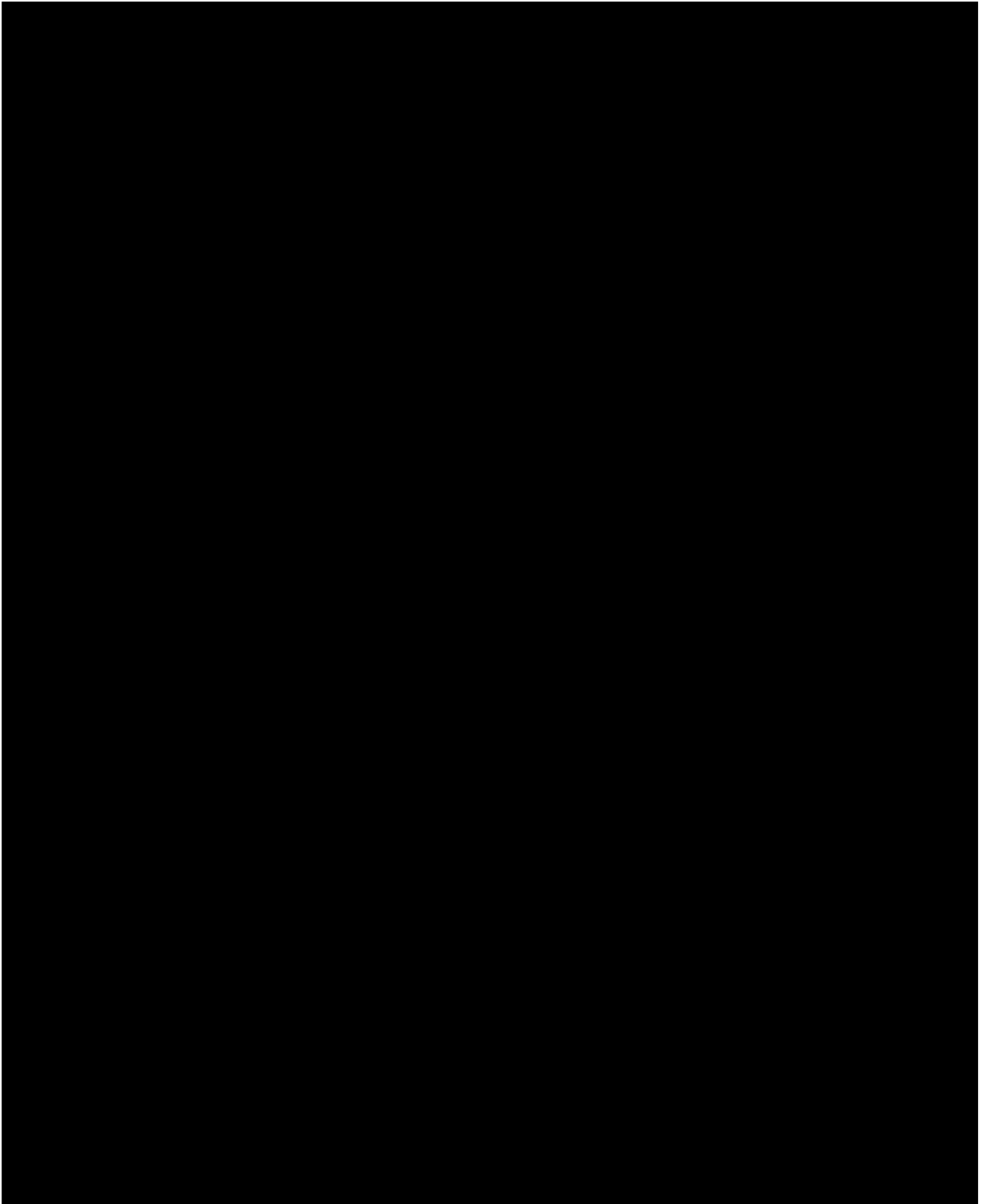
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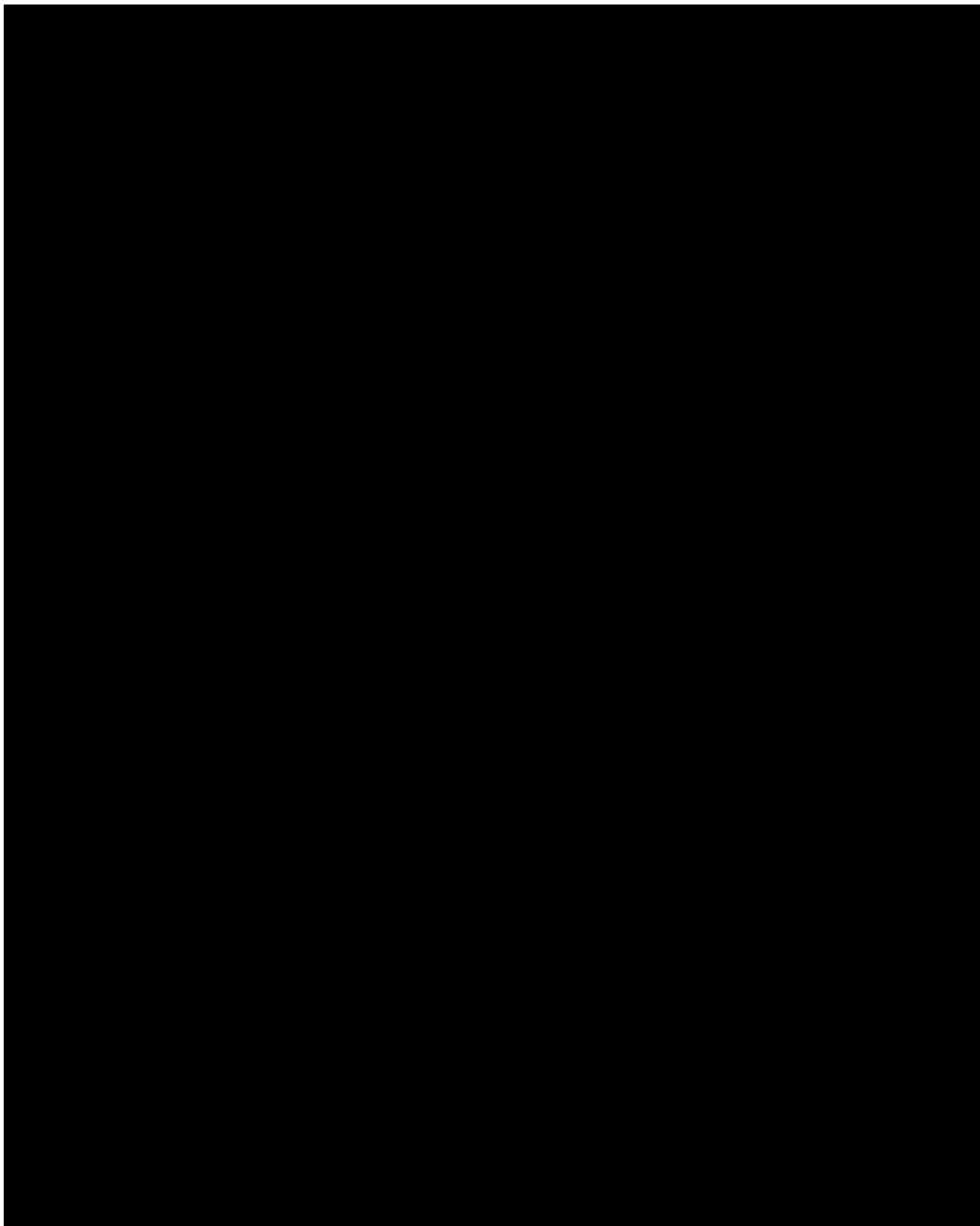
**ATTACHMENT 4: EVACUATION PROCEDURES**

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## ATTACHMENT 5: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

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The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders. To prepare facility personnel for such contingencies, it will be the facility policy that operating personnel designated as Person in Charge and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the facility at the designated location onsite.

**Note:** Severe weather condition-related injuries are covered in the appropriate (Summer or Winter) Weatherization Plan.

### Basic First Response Actions

- Check that the person is not in direct contact with an electrical device. [Try to remove them from an electrical current with a non-conductive item before proceeding to help].
- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
- If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring the AED (if available) to the scene. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions should be commenced.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim, and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.

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- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, do not attempt to move the victim. Make the victim as comfortable as possible and apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.
- Immobilize all injured parts of the victim.
- Prepare victim for transportation if the victim can be safely moved

**Physical Shock**Symptoms

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

**Electric Shock**Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

Treatment

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR and call for an AED, if required.

**Burns**Symptoms

- Deep red color; or

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- Blisters; or
- Exposed flesh.

### **Treatment**

- Cooled immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

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## ATTACHMENT 6: FIRE RESPONSE PLAN

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Chisholm maintains this fire response plan which describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of plant personnel and minimize damages to plant equipment and the surrounding environment.

### Fire Incidents

All Personnel working at Chisholm are to be trained and should know how to prevent and respond to a fire emergency. All on-site staff shall:

1. Complete a training program identifying the fire risks at Chisholm.
2. Understand the protocol and follow emergency procedures should an event occur.
3. Review and report potential fire hazards to the Facility Manager and provide the following information:
  - a. That a fire has been discovered
  - b. The location and source of the fire
  - c. Any injuries that have occurred
  - d. The cause of the fire (if known)
  - e. Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

**No person is required or permitted to place themselves in harm's way in order to facilitate extinguishment, evacuation, or rescue. All rescue operations will be performed by trained professionals upon their arrival.**

**\*NOTE:** Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, personnel could extinguish the fire in the incipient stage if safe to do so. Personnel should not attempt to extinguish fires in the BESS equipment. If a fire commences in the BESS cabinets, doors to the cabinets should be closed in the case that it may be performed safely.

**Example:** A fire commences in the immediate vicinity of a person who does not have immediate access to a communication device. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio/phone to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the **immediate action is to notify others over the radio and get help.**

## **Conditions Associated with Energy Storage Systems**

### **Unique Challenges**

Energy storage systems present a unique challenge for fire fighters. Unlike a typical electrical or gas utility, an energy storage system does not have a single point of disconnect. Whereas there are disconnects that will de-energize select parts of the system, batteries will remain energized.

The following hazards may be encountered when fighting fires in energy storage systems:

- Shock or arcing hazard due to the presence of water during suppression activities
- Related electrical enclosures may not resist water intrusion from the high-pressure stream of a fire hose
- Batteries damaged in the fire may not resist water intrusion
- Damaged conductors may not resist water intrusion
- Shock hazard due to direct contact with energized components
- No means of complete electrical disconnect
- Chemical spills
- Toxic gases
- Thermal runaway and explosions.

### **Fire and Water**

Due to the hazards described above, care and consideration should be applied when considering fire suppression by means of water inundation within energy storage systems. But because water as an extinguisher is commonplace, the appropriate use of water as an extinguishing medium should be assessed. The local fire department should be informed of appropriate fire suppression methods for the energy storage system type as identified by the equipment manufacturer.

If unconventional fire extinguishers are required, local first responders should be alerted and trained on their use, including a familiarization drill. The appropriate and most suitable extinguisher should be recommended based on the specific needs of the site in accordance with guidance from the manufacture. This may include water in some cases, and in all scenarios its use should not be discouraged.

All fire extinguishing equipment, whether automatic or manual, shall be regularly inspected for functionality as per manufacturers' guidance.

**Employee Training and Education**

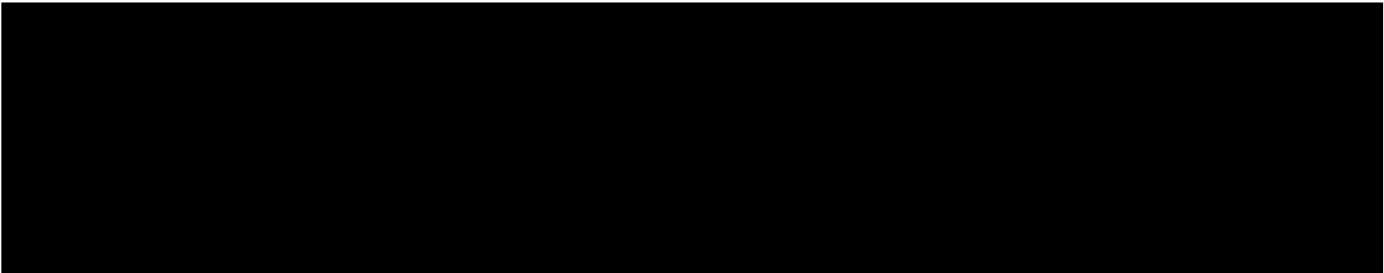
Fire procedures are to be located at the facility o along with first aid, and site-specific project information. The documentation is to be located on-site at a location accessible to all those visiting the site.

O&M staff shall be trained in the practices of fire prevention relevant to their duties. Staff must understand the function and elements of potential emergencies, reporting procedures, evacuation plans, and shutdown procedures. Review any special hazards that might occur at Chisholm, such as flammable materials, fuel storage, toxic chemicals, and water reactive substances.

Fire safety training will occur during the site safety training. O&M staff are required to undergo training prior to starting work. Training shall include:

- Employee roles and responsibilities.
- Recognition of potential fire hazards.
- Emergency notification procedures, including alarms.
- Evacuation routes.
- Location and operation of manually operated equipment (fire extinguishers).
- Emergency response procedures.
- Emergency shutdown procedures.
- Information regarding specific materials to which employees may be exposed.
- Review OSHA requirements contained in 29 CFR 19010.38, Emergency Action Plans.
- Review OSHA requirements contained in 29 CFR 1910.39, Fire Prevention Plans.
- The location of the company fire protection plan and how it can be accessed.
- Good fire-prevention housekeeping practices and equipment maintenance.

The Emergency Response Coordinators are responsible for fire safety training. Written documentation of the training received by each employee must be maintained.



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In the event of an incipient stage (beginning, small) fire, employees should notify adjacent individuals of this situation and exit the area. Only employees trained in the use of fire extinguishers should attempt to use an extinguisher. Employees are not expected or authorized to respond to fires beyond the incipient stage (i.e., fires that are beyond the beginning stage and which cannot be extinguished using a hand-held, portable fire extinguisher). The fire department should be immediately notified by dialing 911 when any type of unintended fire has taken place. Site management shall also be immediately notified of any emergency.

**Fire External to Battery Container****1. Call 911 and report the following:**

- **Site name: Chisholm Grid**
- **The address of the main entrance: 9400 Asphalt Dr. (10015 Hicks Field Road) or nearest site access point**
- **Injuries, if any, and need for ambulance**

2. Make sure the immediate area of the fire is clear of personnel.
3. Account for all employees, contractors, and visitors who were working in the immediate area of the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made through out the facility in attempt to locate the person(s) missing. If the person(s) is equipped with a facility radio, then an emergency transmission shall be communicated in attempt to locate the person(s).
4. Contact the Facility Manager immediately.
5. Remove any obstructions (vehicles, material, etc.) that might impede response to the scene.
6. Station available personnel at road intersections to stop traffic flow into the fire scene.
7. Evacuate the energy storage system area immediately if the fire warning alarm sounds or fire warning lights illuminate.
8. Proceed to the designated muster point for head count.
9. If onsite, the designated Person-in-Charge will do a head count and relay any information/instructions.
10. If you encounter heavy smoke, stay low and breathe through a handkerchief or other fabric; move away from the area.
11. Assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk.

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12. Attempt to extinguish the fire ONLY if you have had the appropriate training and proper firefighting agent for the type of fire. Refer to the specific safety data sheet.
13. Do not leave the designated muster point until advised to do so. If risk (e.g., smoke) requires evacuation of the muster point, the secondary muster point will be used, and that fact announced via radio and alarms as available.
14. The Person-in-Charge will issue an 'all clear' only when the fire department informs them that it is safe to do so.
15. The energy storage system is not to be accessed until the Facility Manager gives authorization.

**Fire Internal to Battery Container**

1. Call 911 and report the following:
  - **Site name: Chisholm Grid**
  - **The address of the main entrance: 10015 Hicks Field Road or nearest site access point**
  - **Injuries, if any, and need for ambulance**
2. Make sure the immediate area of the fire is clear of personnel.
3. Account for all employees, contractors, and visitors who were working in the area of the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made through out the facility in attempt to locate the person(s) missing. If the person(s) is equipped with a facility radio, then an emergency transmission shall be communicated in attempt to locate the person(s).
4. Contact the Facility Manager.
5. Evacuate the area immediately if the fire warning alarm sounds or fire warning lights illuminate.
6. Keep distance away from the container(s) and make sure that no facility responders or fire responder personnel approaches the container until it is safe to do so. The determination of safe will be done through a series of decisions based on technical information from the SME, fire department sights and observations and data from the batt
7. Remove any obstructions (vehicles, material, etc.) that might impede response to the scene.
8. Proceed to the designated muster point for head count.

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9. If onsite, the designated Person-in-Charge will do a head count and relay any information/instructions.
10. If you encounter heavy smoke, stay low and breath through a handkerchief or other fabric.
11. If there is a second means of egress that is clear of smoke that egress path will be used, and a radio transmission or other type of communication shall be made stating the clear egress point for other personnel to use for escape.
12. Assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk.
13. The fire suppression system is designed to work in a contained environment. DO NOT open the doors until it has been determined that the agent has been fully released and a pre-determined amount of time has passed to ensure no hazards are present, and with approval of emergency personnel and Subject Matter Expert.
14. DO NOT put anyone in harm's way to save the battery equipment in the container.
15. Once the Fire Department arrives, provide them with the following:
  - All applicable SDS documents
  - Assistance isolating equipment electrically
  - Site Emergency Response Plan
16. Do not leave the designated muster point until advised to do so. If risk (e.g., smoke) requires evacuation of the muster point, the secondary muster point (designated on the map in Appendix 1) will be used and that fact announced via radio and alarms as available.
17. The Person-in-Charge will issue an 'all clear' only when the fire department informs them that it is safe to do so and the site (or portions of it) can be reoccupied or normal working conditions can be resumed again.
18. The energy storage system is not to be accessed until the Person-in-Charge and the emergency responders give authorization.

**After a Fire**

Hazards after a fire should be identified at the time of installation such that recommendations for personal protective equipment (PPE) are available for clean-up crews and hazardous materials (HAZMAT) teams. This may include respirators to protect personnel from toxic gas that continues to be generated from hot cells. Firewater retention and cleanup measures may be required by local regulations.

In addition to the gas generation risk, cells that remain hot also pose a delayed ignition risk, whereby heat in the cell may transfer to undamaged adjacent cells or remaining active material and reignite the fire. As such, fire-damaged equipment must remain monitored for a period identified in consultation with equipment manufacturer and the project SME.

**Site Maintenance and Housekeeping**

- Fire extinguishers shall be inspected monthly as per NFPA 10.
- Fire extinguishers shall not be obstructed and should be in conspicuous locations with appropriate signage as per NFPA 10.
- Combustible material shall not be stored in mechanical rooms, electrical equipment rooms, or energy storage system enclosures.
- Outside dumpsters shall be kept at least five (5) feet away from combustible materials and the lids should be kept closed.
- Materials or equipment storage is not allowed in electrical equipment rooms, or near electrical panels.
- Electrical panel openings must be covered.
- Power strips must be plugged directly into an outlet and not daisy-chained and should be for temporary use only.
- Extension cords and flexible cords should not be substituted for permanent.

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## **ATTACHMENT 7: CHEMICAL OR OIL SPILLS AND RELEASES**

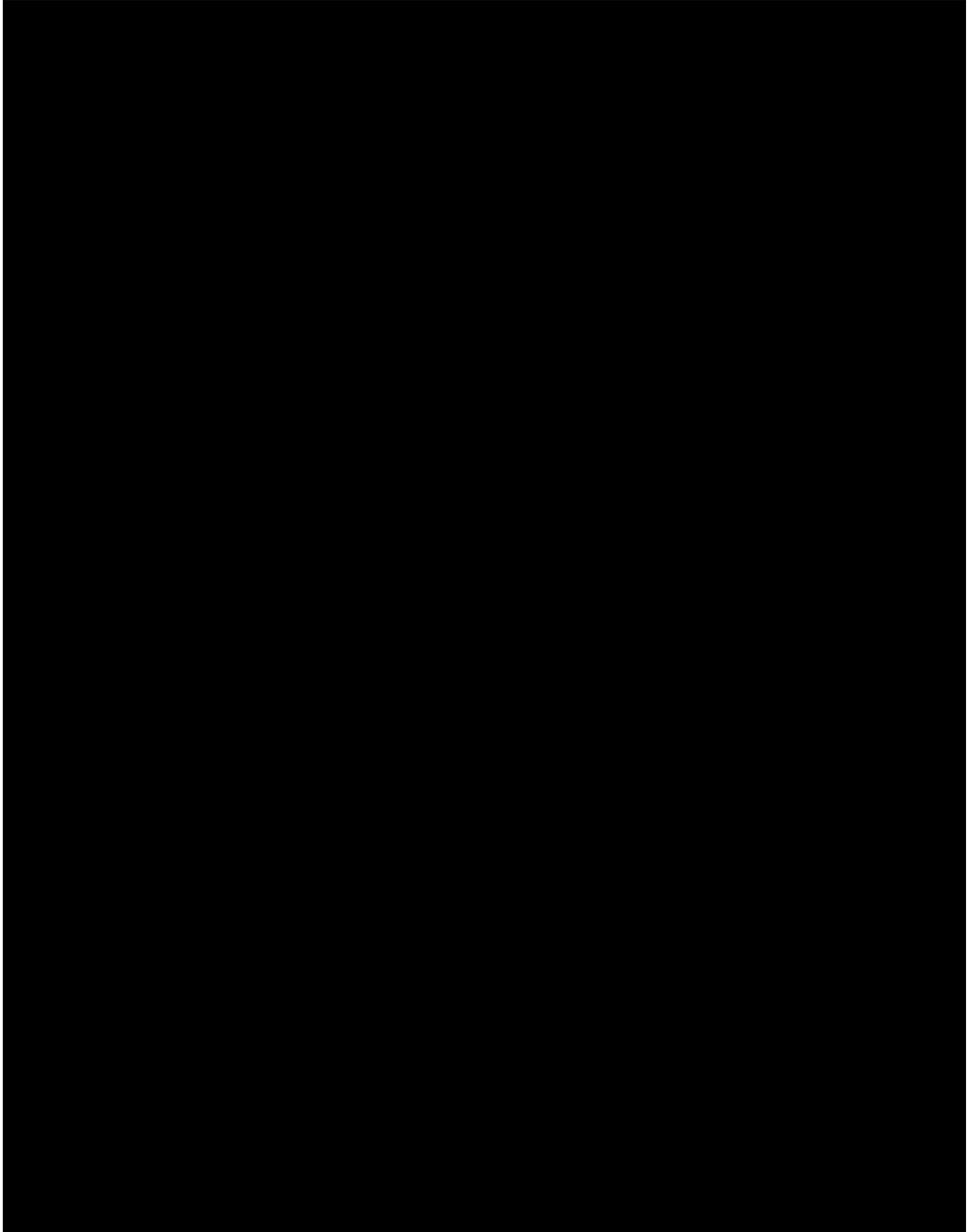
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A site Spill Prevention, Control, and Countermeasure (SPCC) is maintained by the Facility Manager and the Compliance Manager, and a copy will be posted at the site in the control house.

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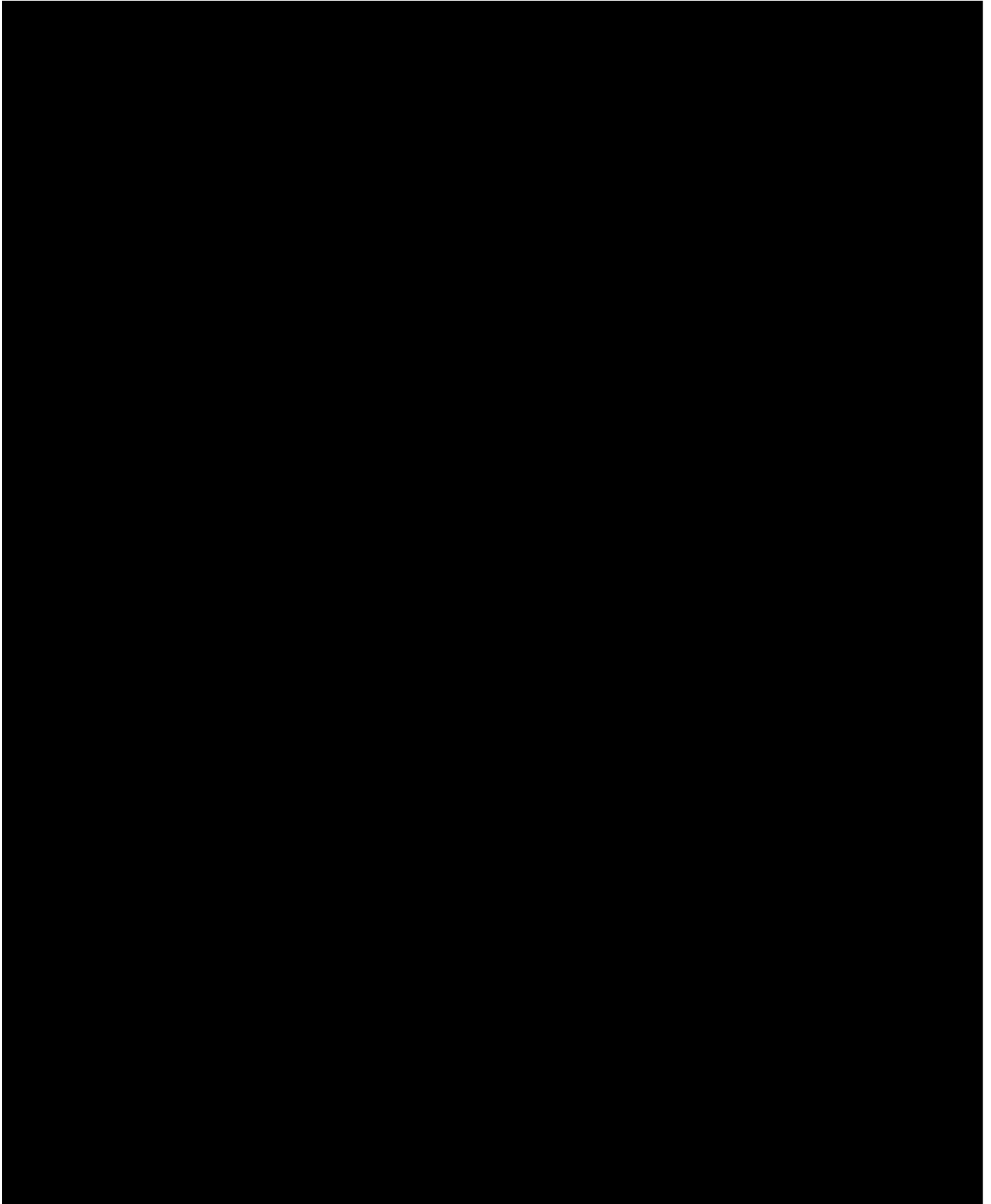
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## **1.0 APPROVAL AND IMPLEMENTATION SECTION**

---

### **A. Introduction and Applicability**

#### **1.1 Introduction**

This annex provides guidance and direction to Chisholm specific to cold weather operations, planning, and emergency response. Chisholm does not have any fuel switching equipment nor does it use water in the generation of electricity.

Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

### **B. Roles and Responsibilities**

#### **1.2 Personnel**

1.2.1 Role – Anyone with authorized physical access to the Chisholm BESS Facility for the purposes of performing work, including Field Services contractors and any other vendors.

1.2.2 Responsibilities include:

- Follow the requirements in this Plan.
- Conduct facility readiness reviews and provide reports to Facility Manager and Compliance Manager upon completion and request.
- Coordinate with and report facility weather-related information to Facility Manager and Res America Asset Management – Chisholm Operating Personnel.
- Identify potential risk areas due to winter weather conditions and report opportunities to improve readiness and response to the Facility Manager.
- Participate in post-winter evaluations to assess the effectiveness of this Plan and provide feedback.

#### **1.3 Compliance Manager**

1.3.1 Role – The Chisholm compliance manager and owner of this plan.

1.3.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.

- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Ensure the EOP is up-to-date and aligns with Chisholm’s business objectives and addresses requirements.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Review and approve the EOP annually.
- Maintains evidence.

#### **1.4 Facility Manager**

1.4.1 Role – the representative of the third-party vendor contracted to manage the performance of O&M services at the Chisholm Facility.

1.4.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all Personnel.
- Lead Personnel in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-cold weather checks and winter season review activities have been completed.
- Oversee the day-to-day operations of the Chisholm facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations are performed within the timeframes required.
- Document remediation activities in the work management system that are required to address winter preparation needs or deficiencies.
- Notify the Compliance Manager of weatherization tasks progress, scheduling, or concerns with meeting deadlines.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Compliance Manager upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Chisholm upon completion and by the end of each calendar year
- Provide evidence to the Compliance Manager upon completion and request.

## **1.5 Field Services**

1.5.1 Role – Contracted to perform the O&M services at the Chisholm Facility.

1.5.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Facility Manager and Compliance Manager.
- Coordinate with and report facility weather-related information to the Facility Manager and Operating Personnel.
- Identify potential risk areas due to cold weather conditions and report opportunities to improve readiness and response to the Facility Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills
- Participate in post-winter evaluations to assess the effectiveness of this annex and provide feedback

## **1.6 Operating Personnel**

1.6.1 Role – The registered Generator Operator (GOP) for the Chisholm facility.

1.6.2 Responsibilities include:

- Coordinate with CES to support control center operations performed on behalf of GOP for Chisholm.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Chisholm outage, shutdown, or curtailment.
- Coordinate with CES to obtain evidence in support of this Plan.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Services and create appropriate log entries for events, incidents, etc.
- Submit evidence to Chisholm upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews

---

## **2.0 LOCAL CONDITIONS**

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For comparison, the recorded temperatures in Fort Worth, Texas for the winter 2020/2021 (November through February) range from an average minimum temperature of 61°F

(November)<sup>1</sup> to an average maximum temperature of 81°F (February),<sup>2</sup> with a low of 28°F recorded in December.

ASHRAE<sup>3</sup> indicates the annual mean minimum to be 17.9°F with a 50-year return extreme minimum of 7.6°F. The area is prone to ice storms and life-threatening hail events. Snow is very uncommon.

---

### 3.0 REQUIRED TIMELINES FOR COLD WEATHER/WINTER PREPARATIONS

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#### 3.1 Pre-Winter Season Review and Checks

Prior to **October 1** of each calendar year, Field Services will complete a *Pre-Winter Checklist* and submit evidence to the Facility Manager and Compliance Manager.

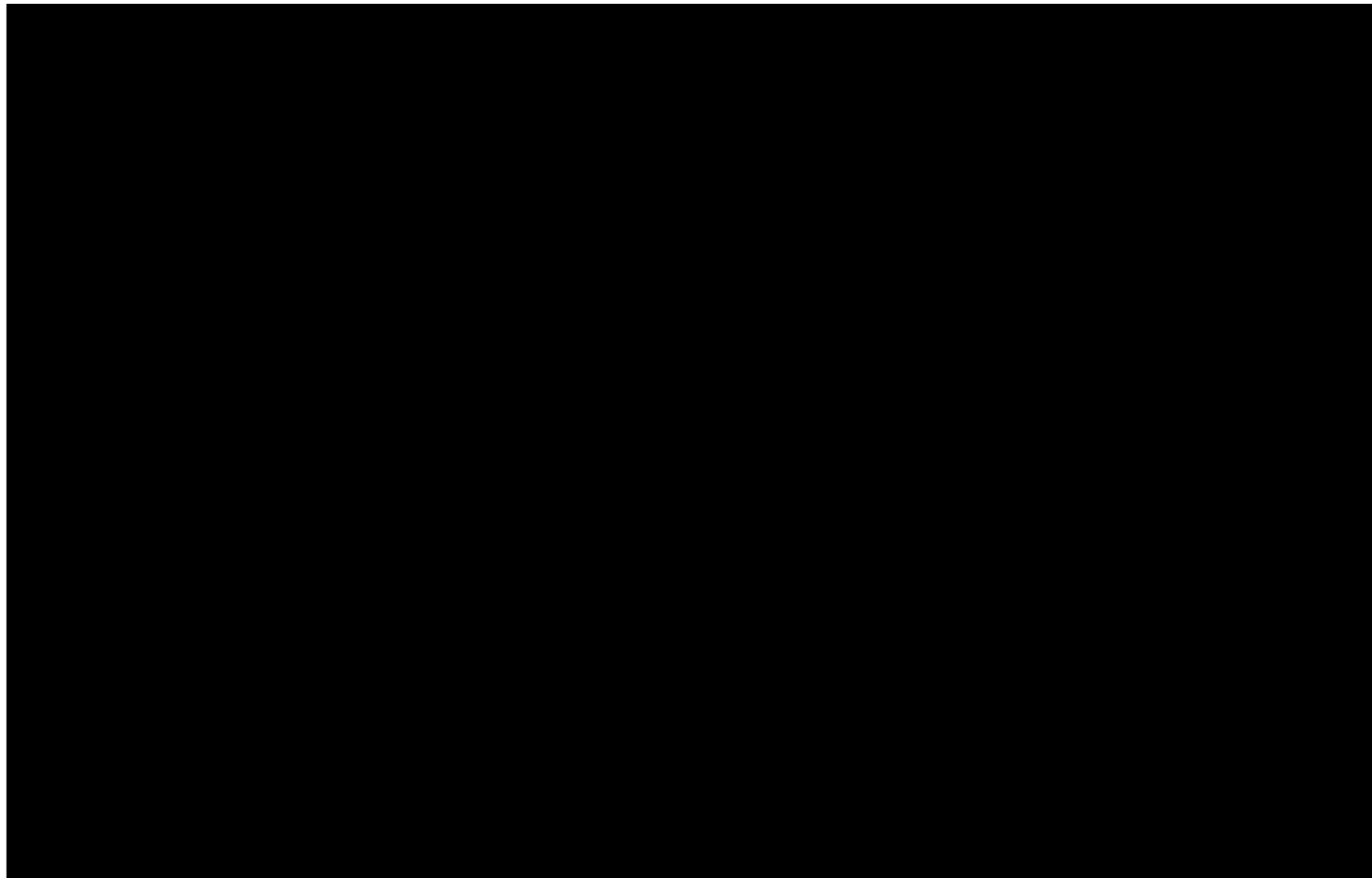
#### 3.2 Pre-Event and Extreme Cold Weather Checks

Field Services will utilize and complete the *Pre-Event Checklist* upon recognition or notification of a possible weather-related event (e.g. extreme cold weather or otherwise). The *Extreme Cold Weather Checklist* will be utilized prior to the forecasted temperature reaching 22°F and/or the possibility of extreme cold weather event. The process for activating the EOP and annexes is documented in the *Emergency Operations Plan*.

---

### 4.0 CHISHOLM CRITICAL COMPONENTS AND EQUIPMENT

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## **5.0 COLD WEATHER PREPARATION AND RESPONSE PROCESSES**

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To support the facility's seasonal winter preparedness, address known critical failure points, and address the effects of equipment and facility weather design limitations, several checklists are provided to prepare and safeguard the facility. Field Services Personnel will utilize these checklists to prepare for winter and respond to winter weather events.

### **5.1 Cold Weather Equipment Inventory List**

Personnel carry equipment in their vehicles, such as flashlight(s), extension cords, potable water, and other consumables that aid Personnel safety for severe winter weather events.

Prior to the onset of the winter season and/or a severe cold weather event, Field Services personnel will ensure there are adequate inventories of all critical supplies, spare parts, equipment, and consumables that would aid in keeping the facility operational during severe cold weather events and responding to these events. Field Services personnel will use and complete the Cold Weather Equipment Inventory and provide the dated checklist as evidence that the inventory review was performed

### **5.2 Pre-Winter Checklist**

The *Pre-Winter Checklist* includes verifications by Field Services personnel readiness and review of this annex. These checklists are due within specified timeframes as they connect directly to required reporting to ERCOT and the PUCT.

### **5.3 Pre-Event and Extreme Cold Weather Checklists**

The *Pre-Event Checklist* and the *Extreme Cold Weather Checklist* will be completed by Field Services personnel to verify communications and preparations are completed and that the facility's critical equipment is protected and functioning properly in advance of each forecasted extreme weather event.

### **5.4 Post-Event and Annual Review**

After each severe cold weather event and before the kickoff of the winter season preparations, Field Services personnel will utilize a review process to formally recognize procedural strengths, evaluate improvement opportunities, corrective actions needed, and lessons learned, which will be incorporated into the EOP going forward.

Any work orders arising from this review process will also be implemented. All changes to these procedures and the EOP must be communicated to relevant operating personnel and regulators. In addition, the Facility Manager will identify and communicate to the Compliance Manager any weatherization improvements that should be included for the subsequent year's budget.

#### **5.5 Documenting Winter Season Preparedness Activities per Work Order Management**

Field Services personnel will review its preventative maintenance schedule to ensure adequate annual preventative work orders exist for winter season preparedness. Field Services personnel will also ensure: (i) all open corrective maintenance items that could affect facility operation and reliability in cold weather; and (ii) all cold weather preparedness preventative work orders are completed prior to the onset of the winter season.

#### **5.6 Additional Staffing Consideration for Weather Events**

Personnel are not regularly on site and would not normally be dispatched to the site during extreme weather conditions. The safety of personnel will be considered, and personnel would only be dispatched during an extreme weather condition if it is necessary to prevent an emergency.

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### **6.0 BUSINESS CONTINUITY - CRITICAL FAILURE POINTS – PERSONNEL (STAFFING)**

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## 7.0 COLD-RELATED SAFETY INFORMATION

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### 7.1 Personnel Safety

Personnel safety during extreme cold weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Chisholm Personnel will stay informed of potential severe weather events and utilize the information in this plan to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme cold weather events.

### 7.2 Frostbite

Frostbite is most common on the fingers, toes, nose, ears, cheeks, and chin. Because of skin numbness, you may not realize you have frostbite until someone else points it out.

#### 7.2.1 Signs and symptoms of frostbite include:

- At first, cold skin and a prickling feeling
- Numbness
- Red, white, bluish-white, or grayish-yellow skin
- Hard or waxy-looking skin
- Clumsiness due to joint and muscle stiffness
- Blistering after rewarming, in severe cases

#### 7.2.2 Seek medical attention if you experience:

- Signs and symptoms of superficial or deep frostbite
- Increased pain, swelling, redness or discharge in the area that was frostbitten
- Fever
- New, unexplained symptoms.

### 7.3 Hypothermia

**Seek immediate medical attention if you suspect hypothermia, a condition in which your body loses heat faster than it can be produced.**

#### 7.3.1 Signs of hypothermia include:

- Intense shivering
- Slurred speech

- Drowsiness and loss of coordination

## **7.4 Safety Procedures**

7.4.1 During extreme cold weather events, facility Personnel should adhere to the following procedures.

7.4.1.1 Limit your time outdoors in cold, wet, or windy weather.

7.4.1.2 Dress in multiple layers of loose, warm clothing, along with using Personal Protective Equipment (PPE), as needed.

7.4.1.3 Change out of wet clothing as soon as possible.

7.4.1.4 Wear a hat or headband that fully covers your ears.

7.4.1.5 Wear socks and sock liners that fit well, wick moisture, and provide insulation.

7.4.1.6 Seek medical care immediately if you or a co-worker shows symptoms of cold weather-related illness.

---

## 9.0 ANNUAL TRAINING AND ANNEX REVIEW

---

It is imperative that all relevant all relevant operating personnel are familiar with and committed to following this annex, except to the extent that deviations are appropriate under the circumstances during an extreme cold weather event.

To that end, annual review and training will be conducted on cold weather and facility-specific awareness topics to support readiness for executing and implementing this annex. Training must use this annex and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by cold conditions.
- A review of cold weather health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended weather outlook.

All records of attendance for the annual training, drill, or exercises involving this annex will be retained in the Chisholm evidence repository.

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## 10.0 ERCOT ANNUAL WINTER WEATHER DECLARATION SUBMITTAL

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### 10.1 ERCOT Requirement for Annual Winter Weatherization Declaration Submittal

10.1.1 Chisholm must submit a declaration between **November 1 and December 1** that it has completed or will complete all weather preparations required by this annex for equipment critical to the reliable operation of the Generation Resource during the wintertime period (December through February).

10.1.1.1 If the work on the equipment that is critical to the reliable operation of the Generation Resource is not complete at the time of filing the declaration, the Resource Entity shall provide a list and schedule of remaining work to be completed. The declaration shall be executed by an officer or executive with authority to bind the Resource Entity.

10.1.2 Chisholm will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

## 11.0 RESOURCES AND RELATED DOCUMENTS

Chisholm Emergency Operations Plan

Chisholm Cyber and Physical Security Incident Annex

Chisholm Hot Weather Annex

Chisholm Pandemic and Epidemic Annex

### ERCOT

Current Protocols - Nodal: <http://www.ercot.com/mktrules/nprotocols/current>

- Section 3: Management Activities for the ERCOT System
- Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations

### PUCT

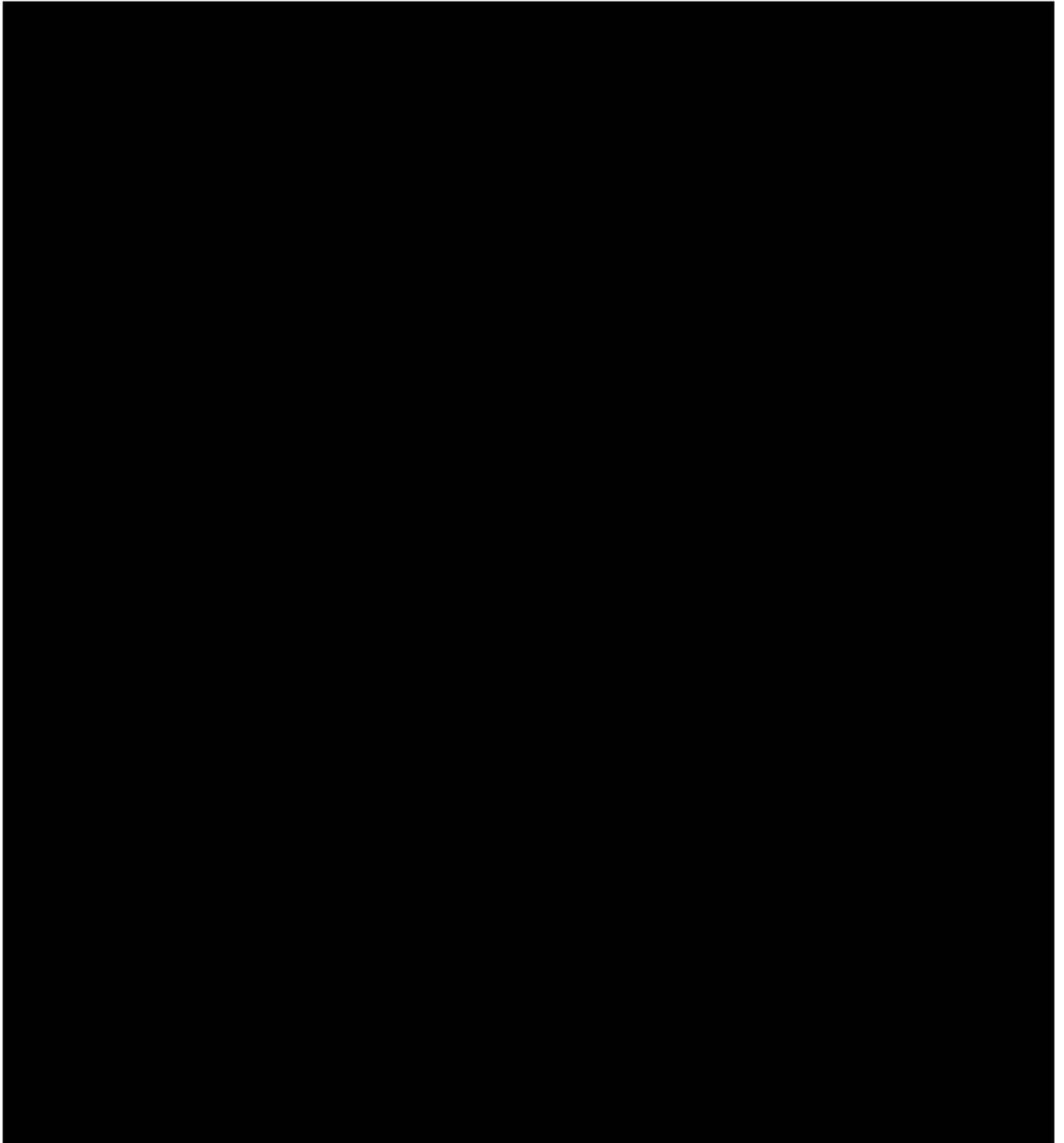
Electric Substantive Rules: Chapter 25 Rules webpage:

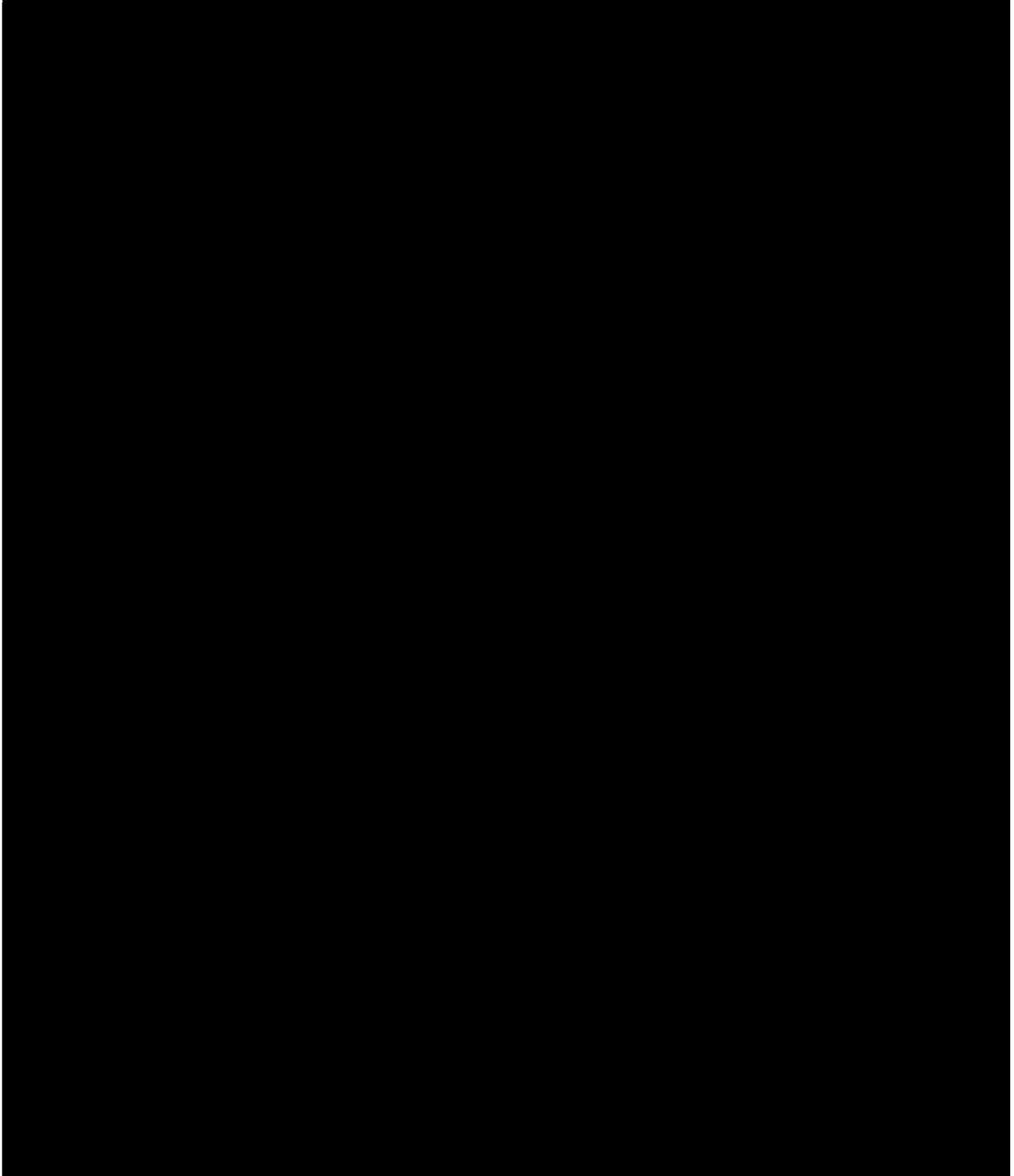
<https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx>

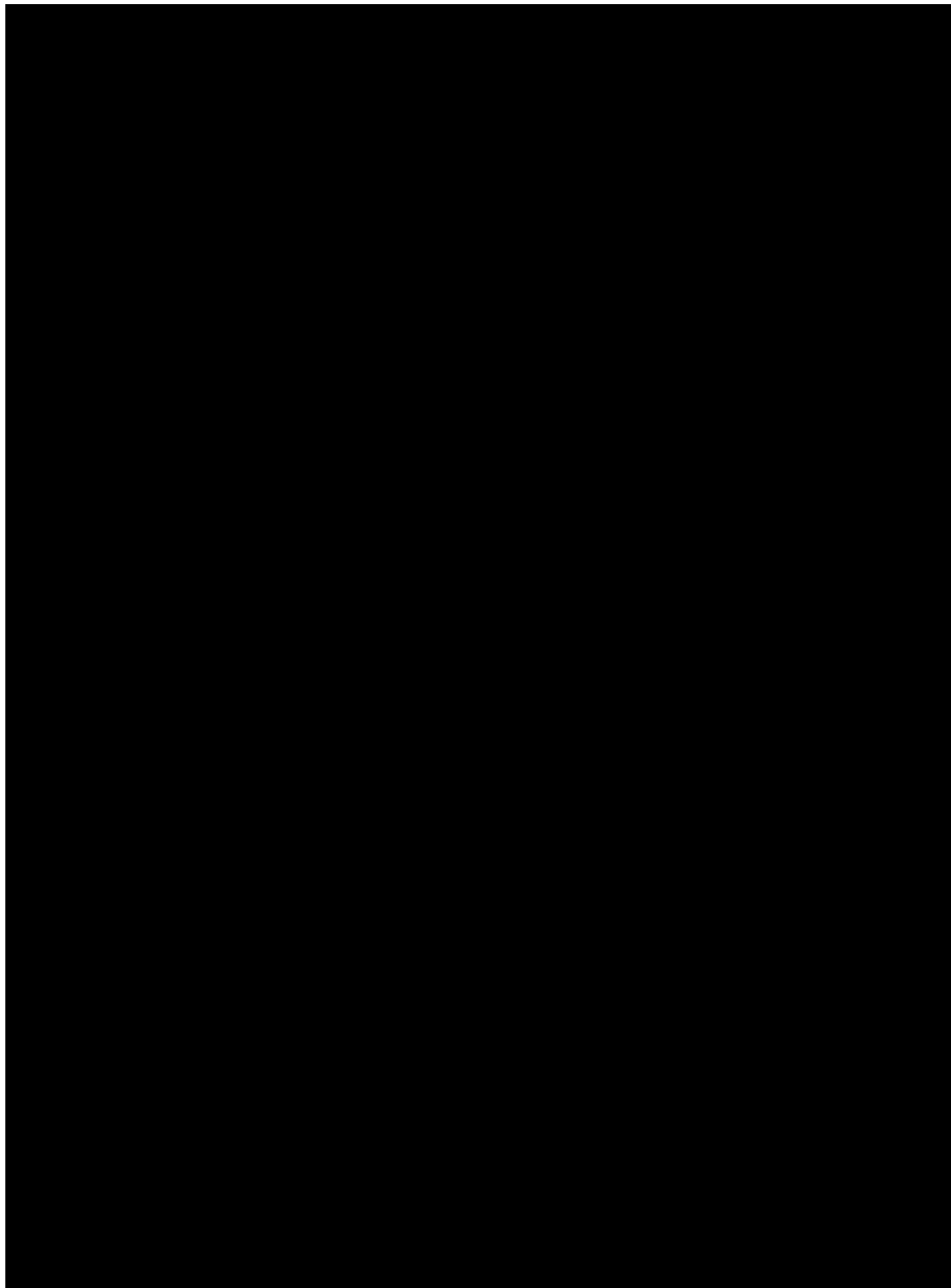
- Subchapter C, §25.53 - Electric Service Emergency Operations Plans

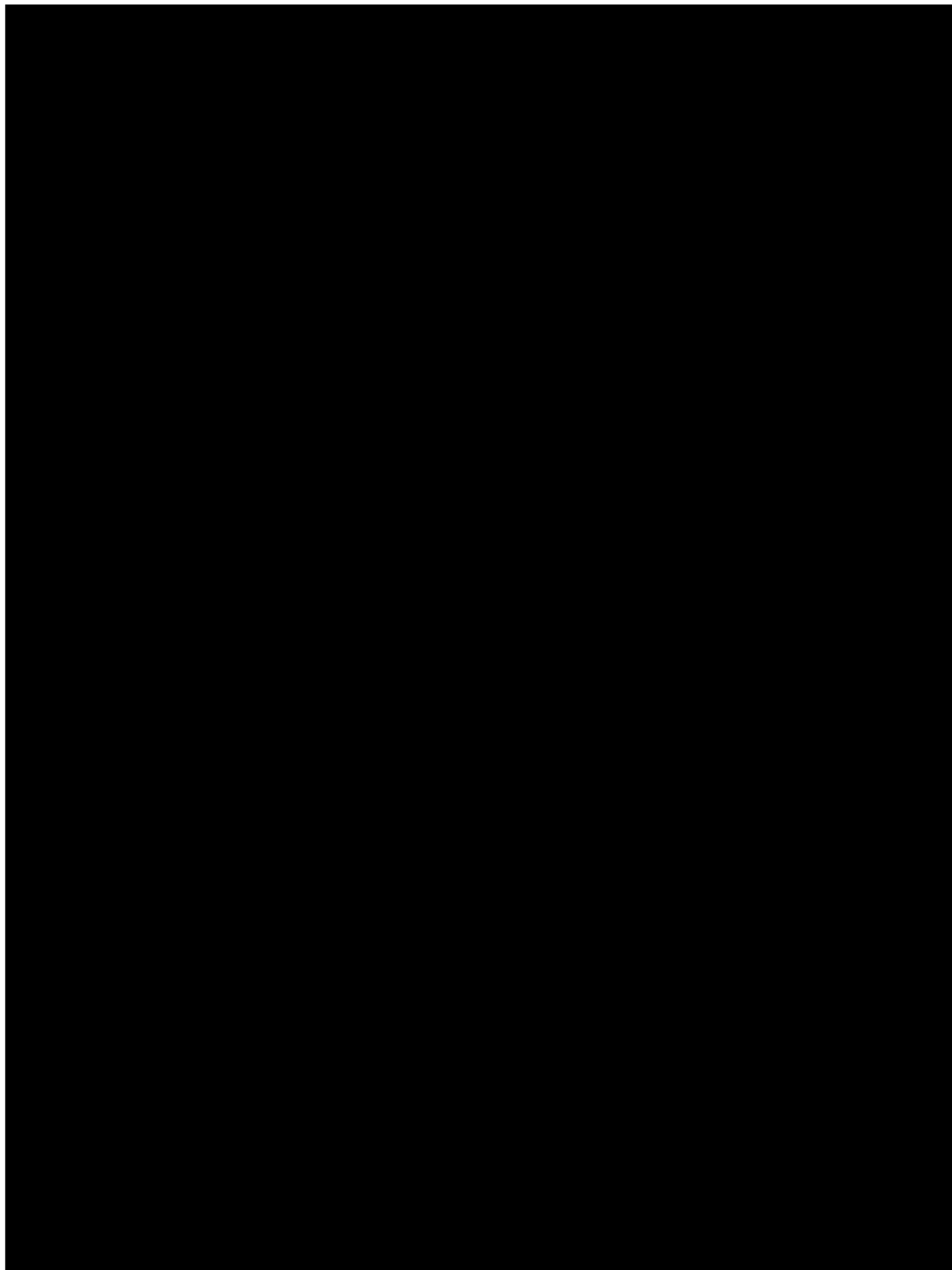
## 12.0 SECTION 25.53 DEFINITIONS

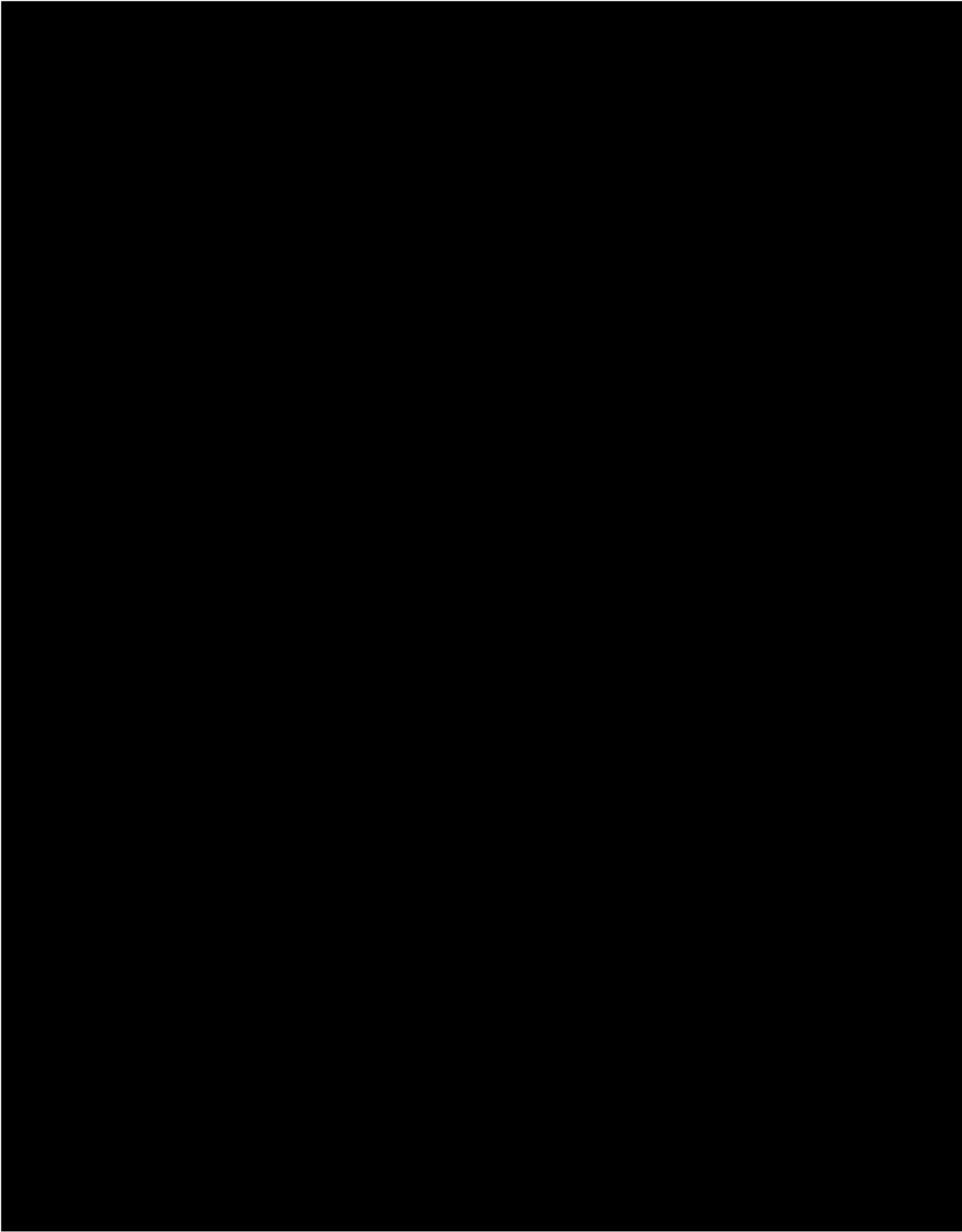
Term	Definition
<b>Annex</b>	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
<b>Drill</b>	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
<b>Emergency</b>	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
<b>Entity</b>	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<b>Hazard</b>	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or

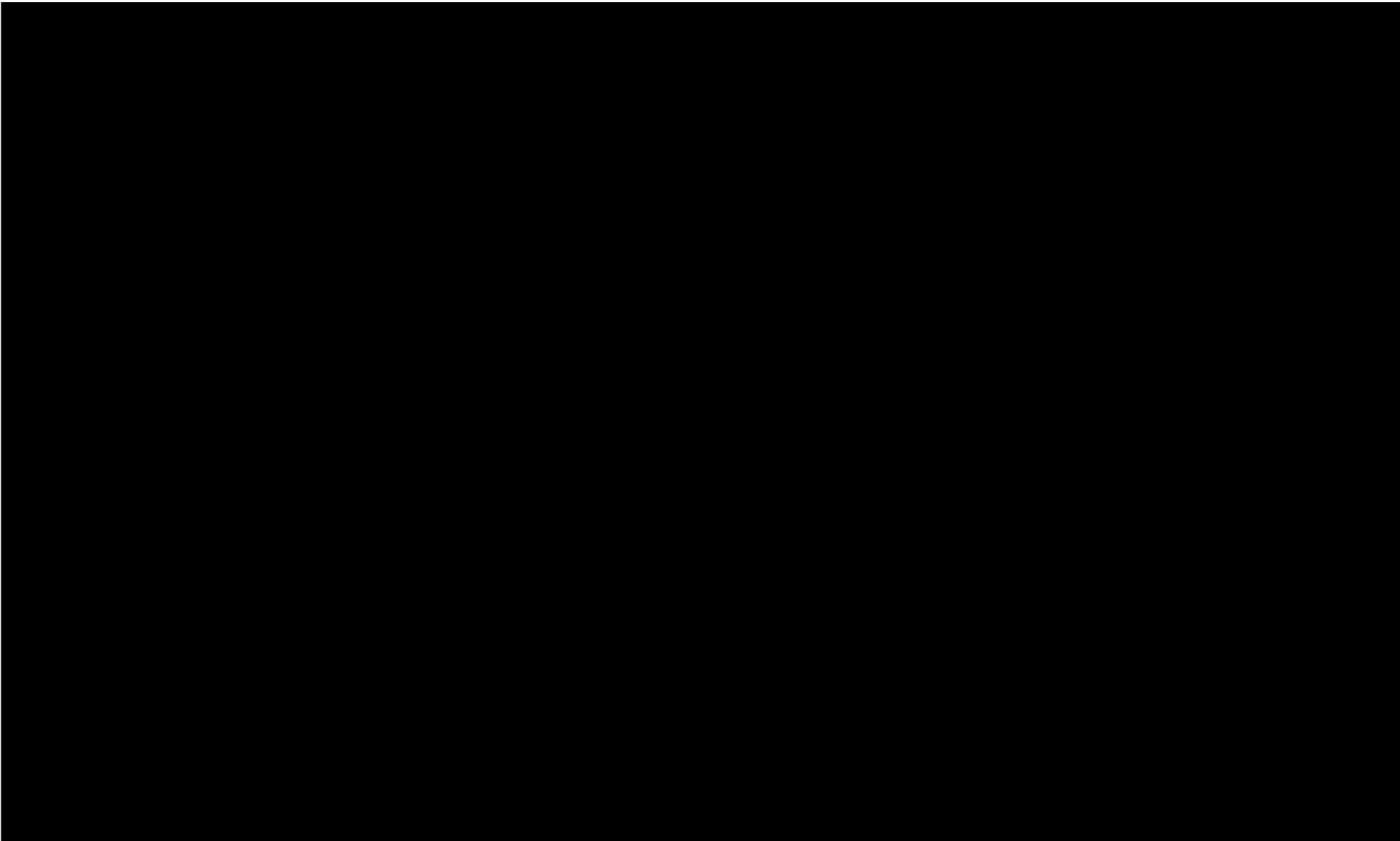












**ATTACHMENT 5: PRE-WINTER CHECKLIST**

<b>Date performed</b>	
<b>Completed by (name)</b>	

Pre-Winter Checks	
<b>Instructions:</b> Check each item when complete and provide completed checklist to Facility Manager and Compliance Manager. Use blank lines to add items as needed.	
<input type="checkbox"/>	Complete the <i>Winter Weather Equipment Inventory</i> and submit to the Facility Manager and Compliance Manager.
<input type="checkbox"/>	Conduct facility winter readiness meeting to review the EOP and winter weather events from the previous winter season.
<input type="checkbox"/>	Review any industry best practices or lessons learned from the previous winter season. Make updates to this annex and supply checklist(s), as needed.
<input type="checkbox"/>	Conduct annual winter readiness training and drill with all relevant operating personnel. Utilize and follow the annex during the training and drill. Collect feedback the EOP (if any) and, without unnecessary delay, provide Compliance Manager.
<input type="checkbox"/>	Review work orders for cold weather preparedness preventative work to confirm they are scheduled for completion, as needed, prior to the onset of the winter season.
<input type="checkbox"/>	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme cold or severe winter weather event, including but not limited to scheduling and performing winter-related (e.g., check SF-6 gas pressure levels, transformer oil levels) maintenance prior to the beginning of winter and increasing surveillance during extreme cold weather events by scheduling tasks in the work management system.
<input type="checkbox"/>	Notify the Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete winter weatherization.

**ATTACHMENT 6: PRE-EVENT CHECKLIST**

Date performed	
Completed by (name)	

Pre-Event Checklist	
Instructions: Check each item when complete and provide completed checklist to Facility Manager and Asset Manger. Use blank lines to add items as needed.	
<input type="checkbox"/>	Monitor weather and weather alerts. Note in shift logs when a cold weather advisory has been issued, and subsequently recalled or released.
<input type="checkbox"/>	Place severe weather protections in service where extreme cold weather could adversely impact Personnel, operations, or forced outage recovery.
<input type="checkbox"/>	Establish communications with Operating Personnel on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
<input type="checkbox"/>	Verify appropriate cold weather PPE for field personnel.
<input type="checkbox"/>	Review staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
<input type="checkbox"/>	Monitor temperatures and take actions to limit or prevent reliability impacts to instrumentation and equipment due to extreme cold.
<input type="checkbox"/>	Site Manager to schedule and conduct meeting with field personnel to discuss the weather forecast and to keep all personnel alerted to possible weather conditions.
<input type="checkbox"/>	
<input type="checkbox"/>	

**ATTACHMENT 7: EXTREME COLD WEATHER CHECKLIST**

<b>Date performed</b>	
<b>Completed by (name)</b>	

**ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES  
IMMEDIATELY FOR ASSESSMENT**

Extreme Cold Weather Checklist			
Instructions: Answer each item and provide completed checklist to Facility Manager and Compliance Manager. Use blank lines to add items as needed			
Item #	Item	Complete? Yes, No, or N/A	Notes Include any follow-up activity required.
1.	Review outstanding preventative work orders and perform necessary and immediate work needed to protect the facility.		
2.	Establish staff responsibilities to monitor weather and weather alerts, as appropriate.		
3.	Establish communications with Personnel, including notification to Operating Personnel of potential plant outage, shutdown, or curtailment		
4.	Check that all critical equipment is operating and protected per the manufacturer's recommendations during cold weather events. Emphasize the points at the facility where cold weather impacts can occur (e.g., building piping, heat tracer piping, transformer oil levels).		
5.	Refer to <b>Critical Equipment Matrix</b> (Attachment 3) and plan preventative and response actions based on forecasted conditions, which should include notifications to Personnel.		
6.	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements (e.g. checking insulation thickness, quality, and proper installation, building entrances, windows, etc.).		
7.	Check equipment inventory and replenish all quantities. Refer to <b>Winter Weather Equipment Inventory</b> attachment. <u>Be sure to check all First Aid kits and confirm PPE "in use" dates.</u>		

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## **1.0 APPROVAL AND IMPLEMENTATION SECTION**

---

### **A. Introduction and Applicability**

#### **1.1 Introduction**

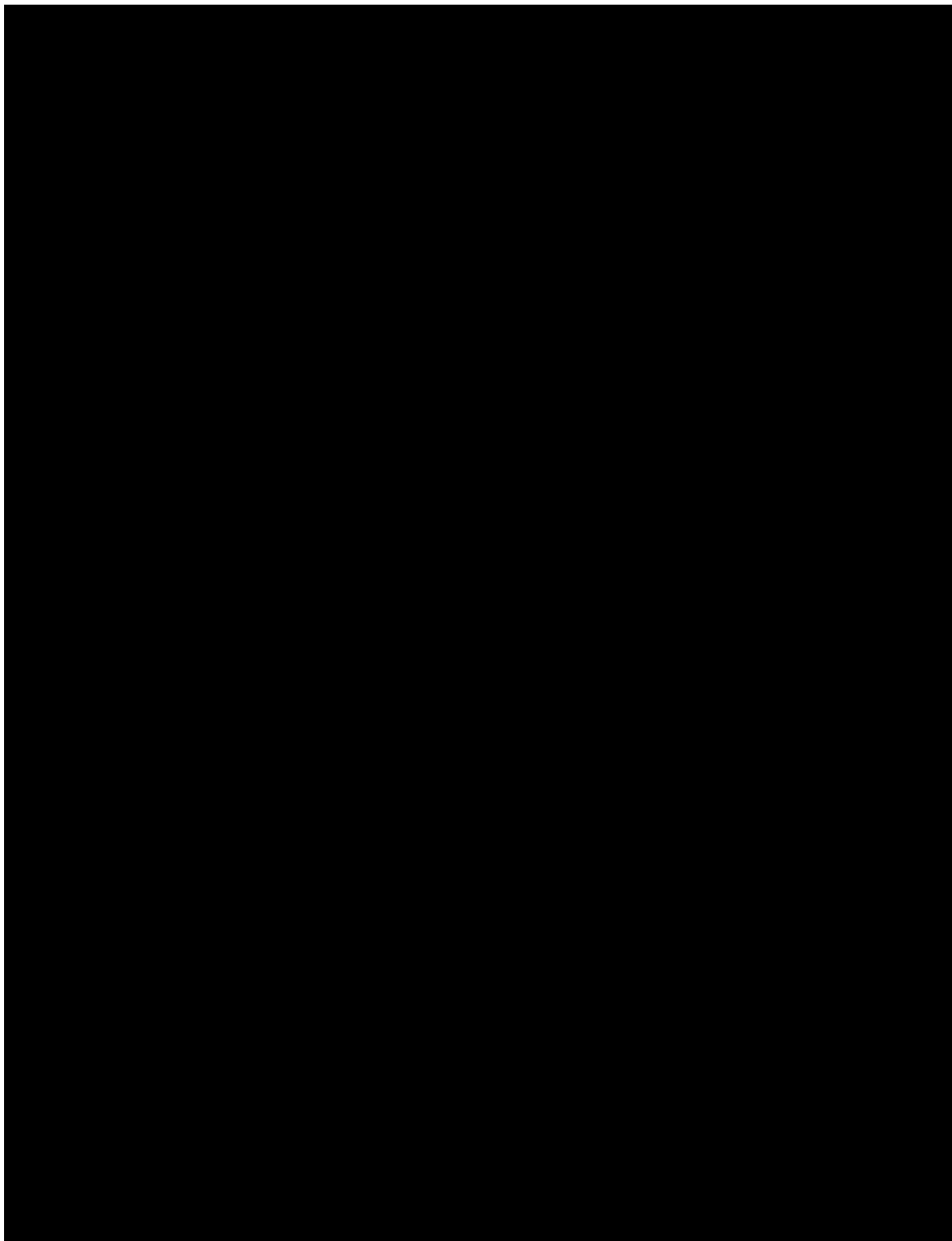
This annex provides guidance and direction to Chisholm specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents.

Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Chisholm Compliance Manager.

**Chisholm Cyber and Physical Security Incident Annex, Version #1.0**

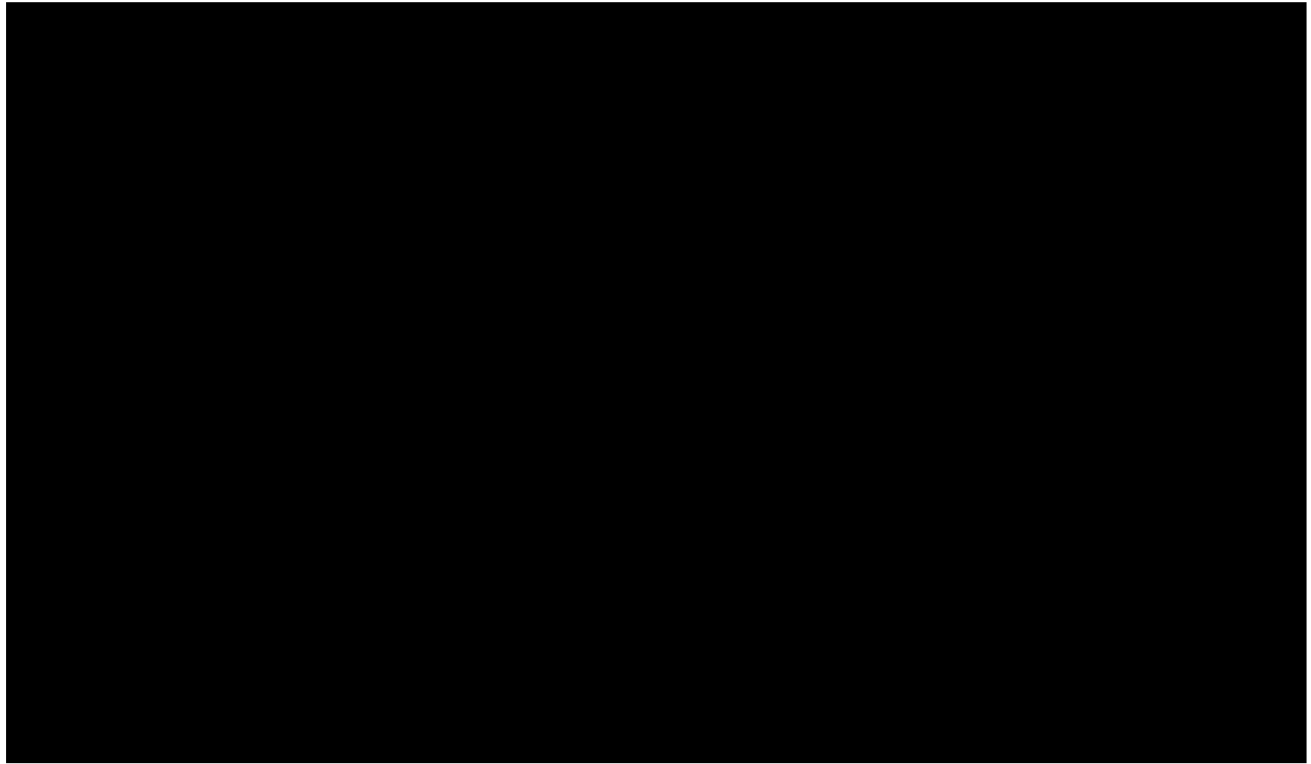
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## Chisholm Cyber and Physical Security Incident Annex, Version #1.0

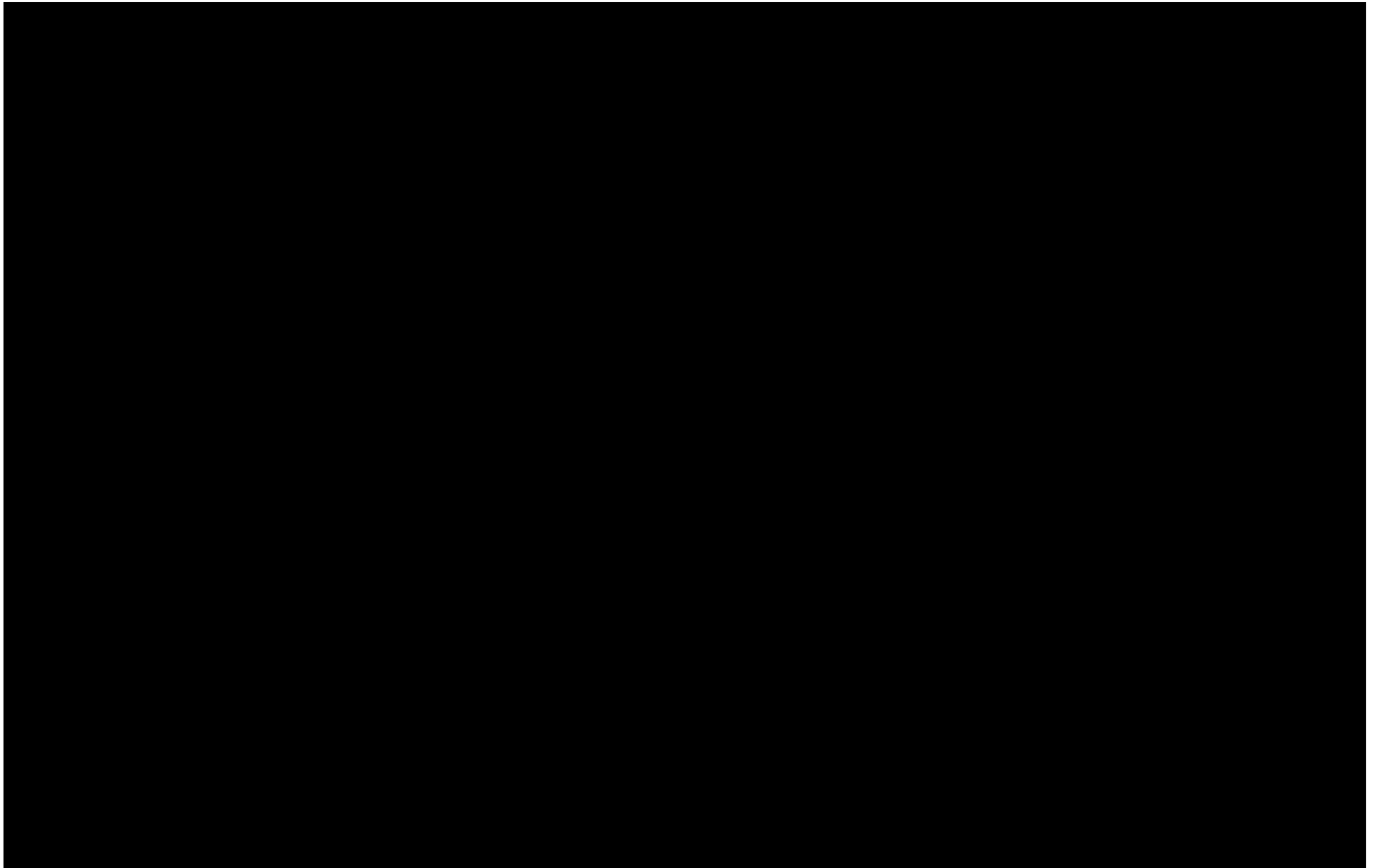
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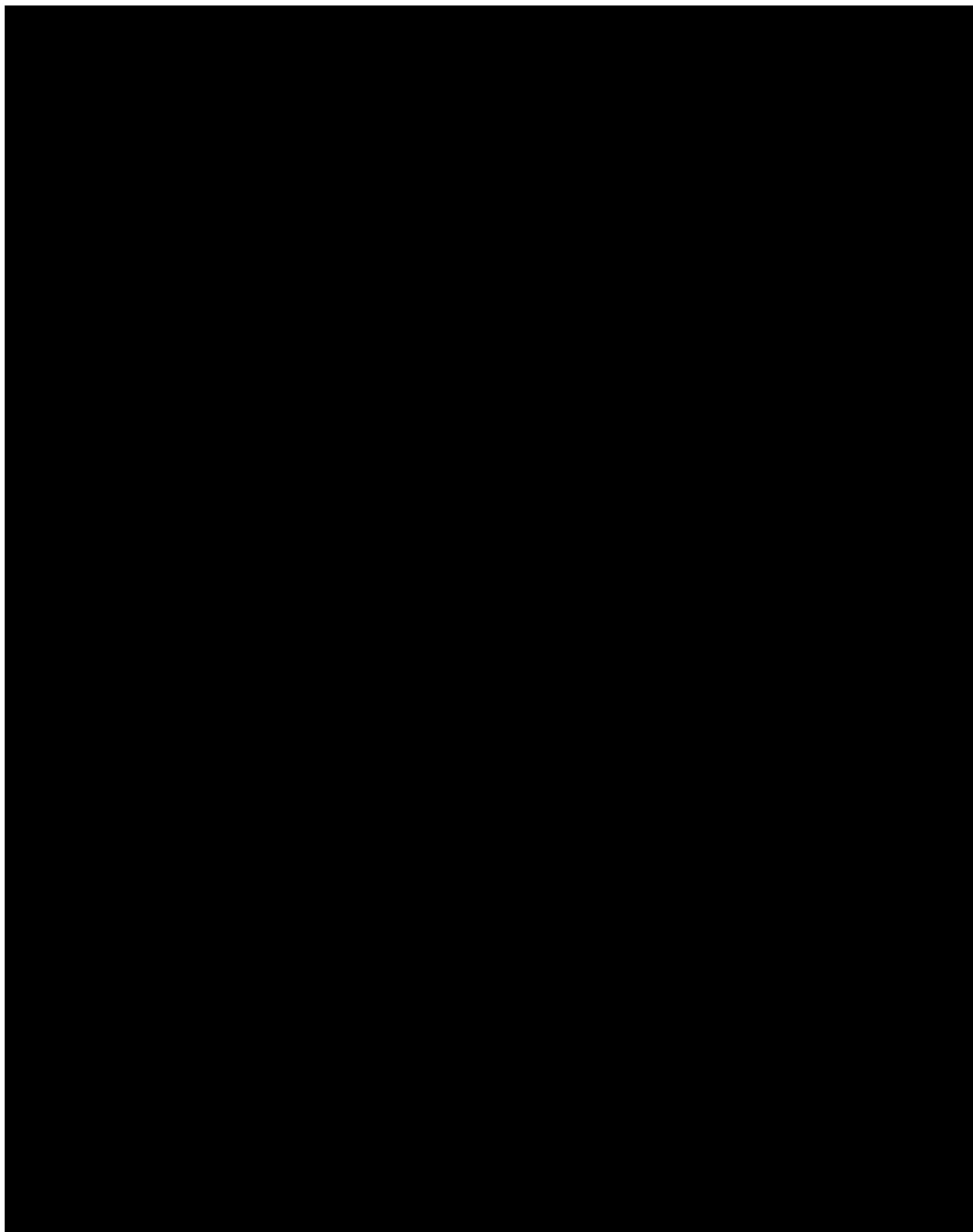
### 2.0 INCIDENT IDENTIFICATION

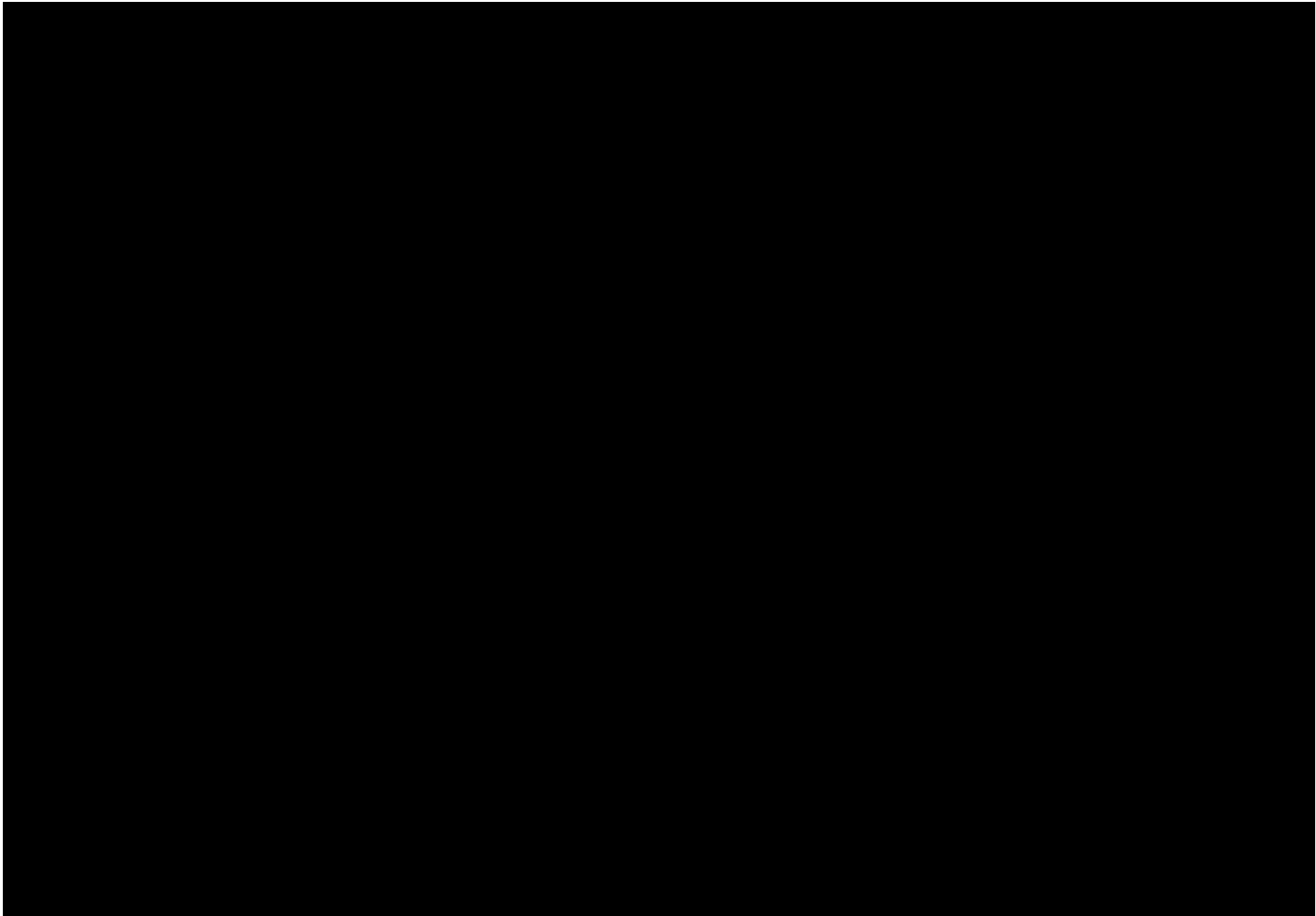
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**Chisholm Cyber and Physical Security Incident Annex, Version #1.0**

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#### **4.0 RESOURCES AND RELATED DOCUMENTS**

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**Chisholm Emergency Operations Plan**

**Chisholm Cold Weather Annex**

**Chisholm Hot Weather Annex**

**Chisholm Pandemic and Epidemic Annex**

**Department of Energy (DOE)**

**Office of Cybersecurity, Energy Security & Emergency Response web page:**

**<https://www.oe.netl.doe.gov/oe417.aspx>**

- DOE-417 Online Submissions and DOE-417 Form and Instructions are located on this web page.
- The Online Submissions link allows a user to include NERC System Awareness and the E-ISAC on the submittal; if the user has a login account, they can include additional recipients as well as retrieve and update past forms.

**NERC**

<https://www.nerc.com/pa/rrm/bpsa/Pages/default.aspx>

## **ERCOT**

Current Protocols - Nodal: <https://www.ercot.com/mktrules/nprotocols/current>

- Section 16: Registration and Qualification of Market Participants
- Section 23 Form E, Notice of Change of Information:
- Section 23 Form O, Notice of Cybersecurity Incident

Current Nodal Operating Guides: <https://www.ercot.com/mktrules/guides/noperating/current>

- Section 3: ERCOT and Market Participant Responsibilities

## **Texas RE**

Texas RE Event Analysis webpage: <https://www.texasre.org/reliabilityservices>

- See “Event Contact Information” section under Event Analysis

## **PUCT**

Electric Substantive Rules: Chapter 25 Rules webpage:

<https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx>

- Subchapter C, §25.53 - Electric Service Emergency Operations Plans

Emergency Contact Update Form (posted under Emergency Management section):

<https://www.puc.texas.gov/industry/electric/forms/>

## **5.0 SECTION 25.53 DEFINITIONS**

Term	Definition
<b>Annex</b>	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
<b>Drill</b>	An operations-based exercise that is a coordinated, supervised activity employed to test an entity’s EOP or a portion of an entity’s EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
<b>Emergency</b>	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
<b>Entity</b>	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.

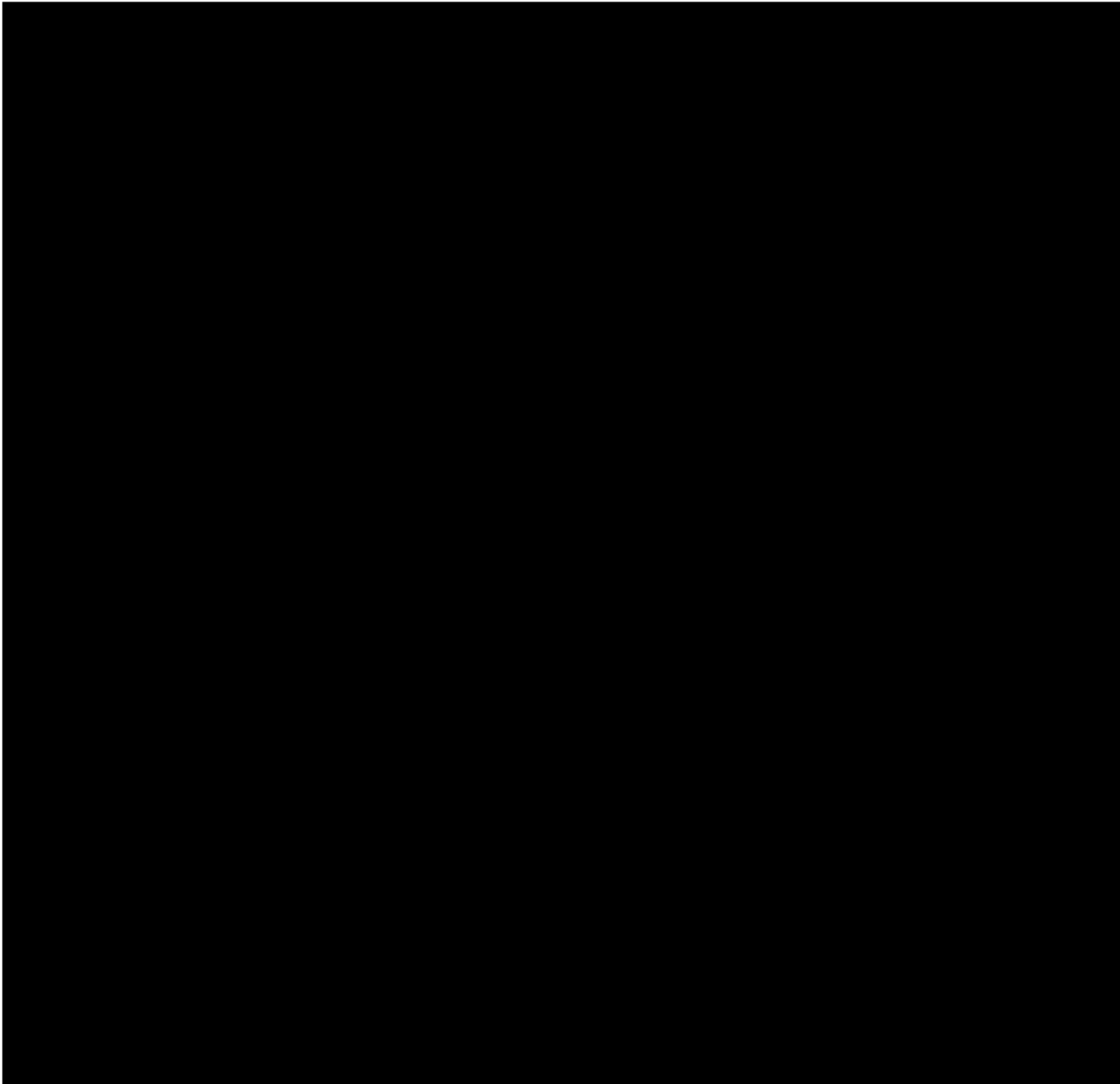
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## **1.0 APPROVAL AND IMPLEMENTATION SECTION**

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### **A. Introduction and Applicability**

#### **1.1 Introduction**

This annex provides guidance and direction to Chisholm specific to hot weather operations, planning, and emergency response. Chisholm does not have any fuel switching equipment nor does it use water in the generation of electricity

Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

### **B. Roles and Responsibilities**

#### **1.2 Personnel**

1.2.1 Role – Anyone with authorized physical access to the Chisholm BESS Facility for the purposes of performing work, including O&M contractors and any other vendors.

1.2.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to the Facility Manager and Compliance Manager upon completion and request.
- Coordinate with and report facility weather-related information to the Facility Manager and Res America Asset Management - Chisholm Operating Personnel.
- Identify potential risk areas due to hot weather conditions and report opportunities to improve readiness and response to the Facility Manager.
- Participate in post-summer evaluations to assess the effectiveness of this annex and provide feedback.

#### **1.3 Compliance Manager**

1.3.1 Role – The Chisholm compliance manager and owner of this plan.

1.3.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.

- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Chisholm’s business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Facility Manager.
- Reviews and approves the EOP annually.
- Maintains evidence.

#### **1.4 Facility Manager**

1.4.1 Role – the representative of the third-party vendor contracted to manage the performance of O&M services at the Chisholm Facility.

1.4.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-hot weather checks and summer season review activities have been completed.
- Oversee the day-to-day operations of the Chisholm facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations are performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hot weather preparation needs or deficiencies.
- Notify the Compliance Manager of weatherization tasks progress, scheduling, or concerns with meeting deadlines.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Chisholm upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Chisholm upon completion and by the end of each calendar year.

- Provide evidence to the Compliance Manager upon completion and request.

## **1.5 Field Services**

1.5.1 Role – Contracted to perform the O&M services at the Chisholm Facility.

1.5.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Facility Manager and Compliance Manager upon completion and request.
- Coordinate with and report facility weather-related information to the Facility Manager and Operating Personnel.
- Identify potential risk areas due to hot weather conditions and report opportunities to improve readiness and response to the Facility Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-summer evaluations to assess the effectiveness of this plan and provide feedback.

## **1.6 Operating Personnel**

1.6.1 Role – The registered Generator Operator (GOP) for the Chisholm facility

1.6.2 Responsibilities include:

- Coordinate with CES to support control center operations performed on behalf of GOP for Chisholm.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Chisholm outage, shutdown, or curtailment.
- Coordinate with CES to obtain evidence in support of this Plan.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Chisholm upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

## 2.0 LOCAL CONDITIONS

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For comparison, the recorded temperatures in Fort Worth, Texas for the summer of 2020 (June through September) ranged from an average maximum temperature of 85.67°F (June)<sup>1</sup>, to an average minimum temperature of 83.04°F (September)<sup>2</sup>, with a high of 106°F recorded in August. The mean 0.4% Dry Bulb temperature according to ASHRAE<sup>3</sup> is 101.4°F with a 50-year return Dry Bulb temperature of 113.1°F.

## 3.0 REQUIRED TIMELINES FOR HOT WEATHER/SUMMER PREPARATIONS

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### 3.1 Pre-Summer Season Review and Checks

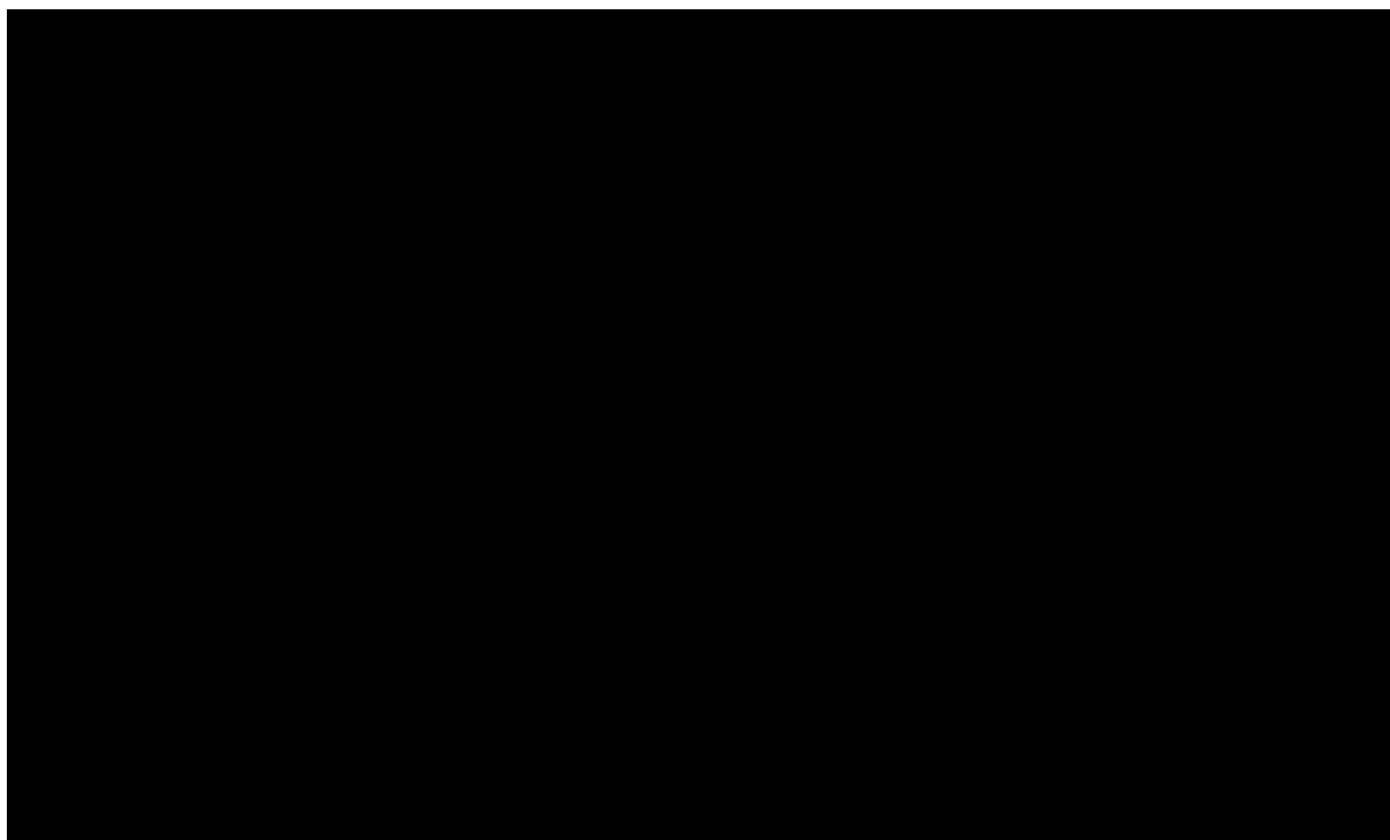
Prior to **April 1** of each calendar year, Field Services Personnel will complete a *Pre-Summer Checklist* and submit evidence to the Facility Manager and Compliance Manager.

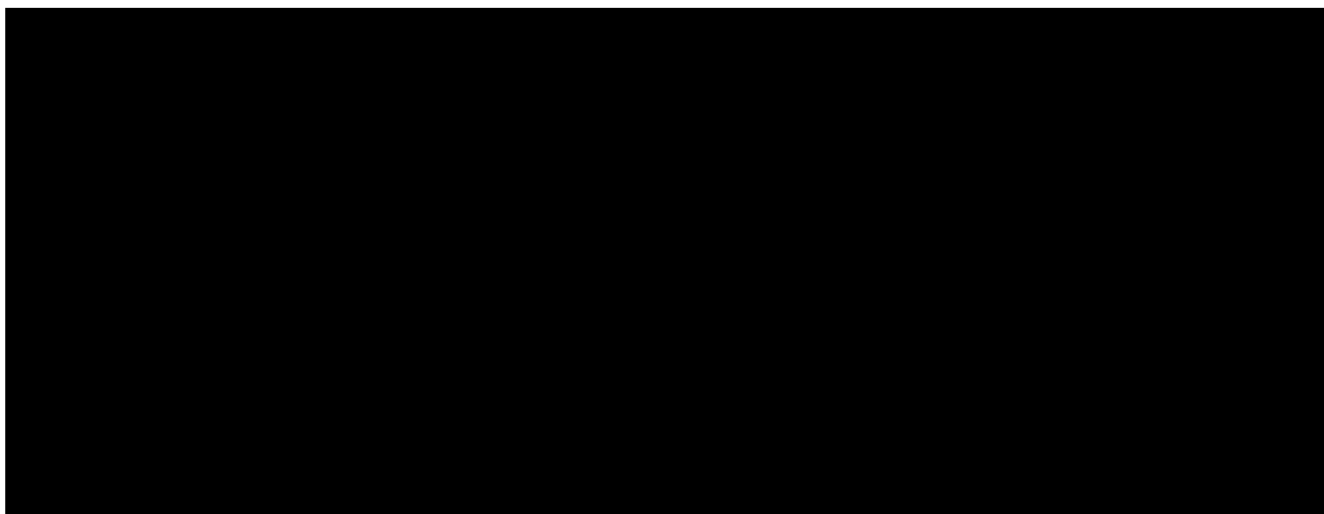
### 3.2 Pre-Event and Extreme Hot Weather Checks

Field Services will utilize and complete the *Pre-Event Checklist* upon recognition or notification of a possible weather-related event (e.g. extreme hot weather or otherwise). The *Extreme Hot Weather Checklist* will be utilized prior to the forecasted temperature reaching 108°F and/or the possibility of extreme hot weather event. The process for activating the EOP and annexes is documented in the Emergency Operations Plan.

## 4.0 CHISHOLM CRITICAL COMPONENTS AND EQUIPMENT

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## **5.0 HOT WEATHER PREPARATION AND RESPONSE PROCESSES**

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To support the facility's seasonal hot weather preparedness, address known critical failure points, and address the effects of equipment and facility weather design limitations, a number of checklists are provided to prepare and safeguard the facility. Field Services Personnel will utilize these checklists to prepare for summer and respond to hot weather events.

### **5.1 Hot Weather Equipment Inventory List**

Personnel carry equipment in their vehicles, such as flashlight(s), extension cord, potable water, and other consumables that aid Personnel safety for severe summer weather events.

Prior to the onset of the summer season and/or a severe hot weather event, Field Services personnel will ensure there are adequate inventories of all critical supplies, spare parts, equipment, and consumables that would aid in keeping the facility operational during severe hot weather events and responding to these events. Field Services personnel will use and complete the *Hot Weather Equipment Inventory* and provide the dated checklist as evidence that the inventory review was performed.

### **5.2 Pre-Summer Checklist**

The *Pre-Summer Checklist* includes verifications of Field Services personnel readiness and review of this annex. These checklists are due within specified timeframes as they connect directly to required reporting to ERCOT and the PUCT.

### **5.3 Pre-Event and Extreme Hot Weather Checklists**

The *Pre-Event Checklist* and the *Extreme Heat or Severe Weather Checklist* will be completed by Field Services personnel to verify communications and preparations are completed and that the facility's critical equipment is protected and functioning properly in advance of each forecasted extreme weather event.

#### **5.4 Post-Event and Annual Review**

After each severe summer weather event and before the kickoff of the summer season preparations, Field Services personnel will utilize a review process to formally recognize procedural strengths, evaluate improvement opportunities, corrective actions needed, and lessons learned, which will be incorporated into the EOP going forward.

Any work orders arising from this review process will also be implemented. All changes to these procedures and the EOP must be communicated to all appropriate personnel and regulators. In addition, the Facility Manager will identify and communicate to the Compliance Manager any weatherization improvements that should be included for the subsequent year's budget.

#### **5.5 Documenting Summer Preparedness Activities per Work Order Management**

Field Services personnel will review its preventative maintenance schedule to ensure adequate annual preventative work orders exist for summer season preparedness. Field Services personnel will also ensure: (i) all open corrective maintenance items that could affect plant operation and reliability in hot weather; and (ii) all hot weather preparedness preventative work orders are completed prior to the onset of the summer season.

#### **5.6 Additional Staffing Consideration for Weather Events**

Personnel are not regularly on site and would not normally be dispatched to the site during extreme weather conditions. The safety of personnel will be considered, and personnel would only be dispatched during an extreme weather condition if it is necessary to prevent an emergency.

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### **6.0 BUSINESS CONTINUITY - CRITICAL FAILURE POINTS – PERSONNEL (STAFFING)**

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## 7.0 HEAT-RELATED SAFETY INFORMATION

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### 7.1 Personnel Safety

Personnel safety during extreme hot weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Chisholm Personnel will stay informed of potential severe weather events and utilize the information in this plan to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme hot weather events.

### 7.2 Heat Exhaustion

7.2.1 Signs of heat exhaustion include:

- Heavy sweating
- Weakness
- Cold, pale, clammy skin
- Fast, weak pulse
- Nausea or vomiting
- Fainting

7.2.2 Response to a heat exhaustion illness should include the following actions:

- Move to a cooler location.
- Lie down and loosen clothing.
- Apply cool, wet clothes to as much of your body as possible.
- Sip water.

**Seek immediate medical attention by calling 911 if you experience vomiting or if your symptoms get worse or last longer than an hour.**

### 7.3 Heat Stroke

Heat stroke is a condition in which your body is unable to adequately cool any longer.

7.3.1 Signs of heat stroke include:

- High body temperature (103oF or higher)
- Hot, red, dry, or damp skin
- Headache
- Dizziness
- Nausea
- Confusion
- Loss of Consciousness

7.3.2 Response to heat stroke should include the following actions:

- Contact Emergency Services by calling 911 if you suspect heat stroke.
- Move person to a cooler place.
- Help lower the person’s temperature with cool cloths or a cool bath.
- DO NOT give the person anything to drink.

## **7.4 Safety Procedures**

7.4.1 During extreme hot weather events, facility Personnel should adhere to the following procedures.

- 7.4.1.1 Review heat stress training and related illness signs and symptoms with Personnel prior to the summer months and prior to anticipated extreme hot weather events.
- 7.4.1.2 Take breaks in air-conditioned spaces
- 7.4.1.3 Wear loose, lightweight, light-colored clothing.
- 7.4.1.4 Wear hats when working outdoors.
- 7.4.1.5 Wear and reapply sunscreen as indicated on the package.
- 7.4.1.6 Regularly drink water to remain hydrated (two to four 8-ounce cups of water every hour while working).
- 7.4.1.7 Where possible, schedule outdoor work for earlier or later in the day to avoid the hottest part of the day.
- 7.4.1.8 Seek medical care immediately if you or a co-worker shows symptoms of heat-related illness.

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## **8.0 HOT WEATHER EVENT COMMUNICATIONS**

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## 9.0 ANNUAL TRAINING AND ANNEX REVIEW

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It is imperative that all relevant operating personnel are familiar with and committed to following this annex, except to the extent that deviations are appropriate under the circumstances during an extreme hot weather event.

To that end, annual review and training will be conducted on hot weather and facility-specific awareness topics to support readiness for executing and implementing this annex. Training must use this annex and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by hot conditions.
- A review of summer weather health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended weather outlook.

All records of attendance for the annual training, drills, or exercises involving this annex will be retained in the Chisholm evidence repository.

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## 10.0 ERCOT ANNUAL SUMMER WEATHER DECLARATION SUBMITTAL

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### 10.1 ERCOT Requirement for Annual Summer Weatherization Declaration Submittal

10.1.1 Chisholm must submit a declaration between **May 1 and June 1** that it has completed or will complete all weather preparations required by this annex for equipment critical to the reliable operation of the Generation Resource during the summertime period (June through September).

10.1.1.1 If the work on the equipment that is critical to the reliable operation of the Generation Resource is not complete at the time of filing the declaration, the Resource Entity shall provide a list and schedule of remaining work to be completed. The declaration shall be executed by an officer or executive with authority to bind the Resource Entity.

10.1.2 Chisholm will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

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## 11.0 RESOURCES AND RELATED DOCUMENTS

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Chisholm Emergency Operations Plan

Chisholm Cyber and Physical Security Incident Annex

Chisholm Cold Weather Annex

Chisholm Pandemic and Epidemic Annex

### ERCOT

Current Protocols - Nodal: <http://www.ercot.com/mktrules/nprotocols/current>

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination for Resource Entities with Natural Gas Generation Resources**

### PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

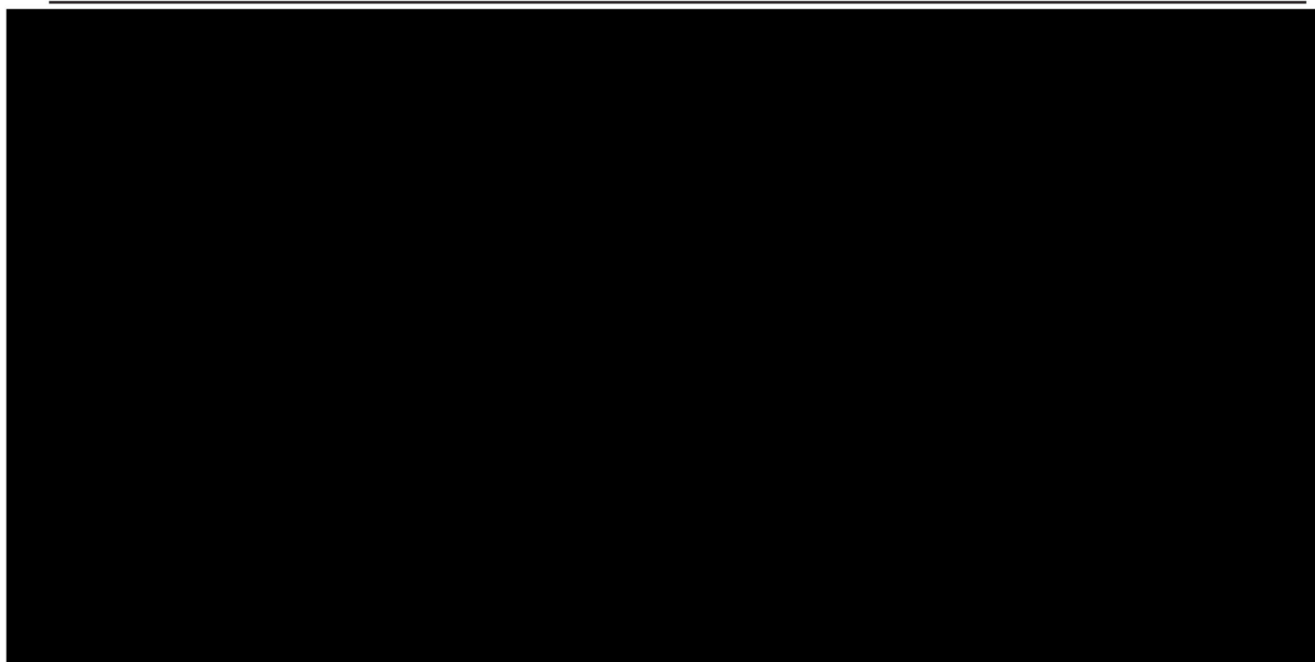
<https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx>

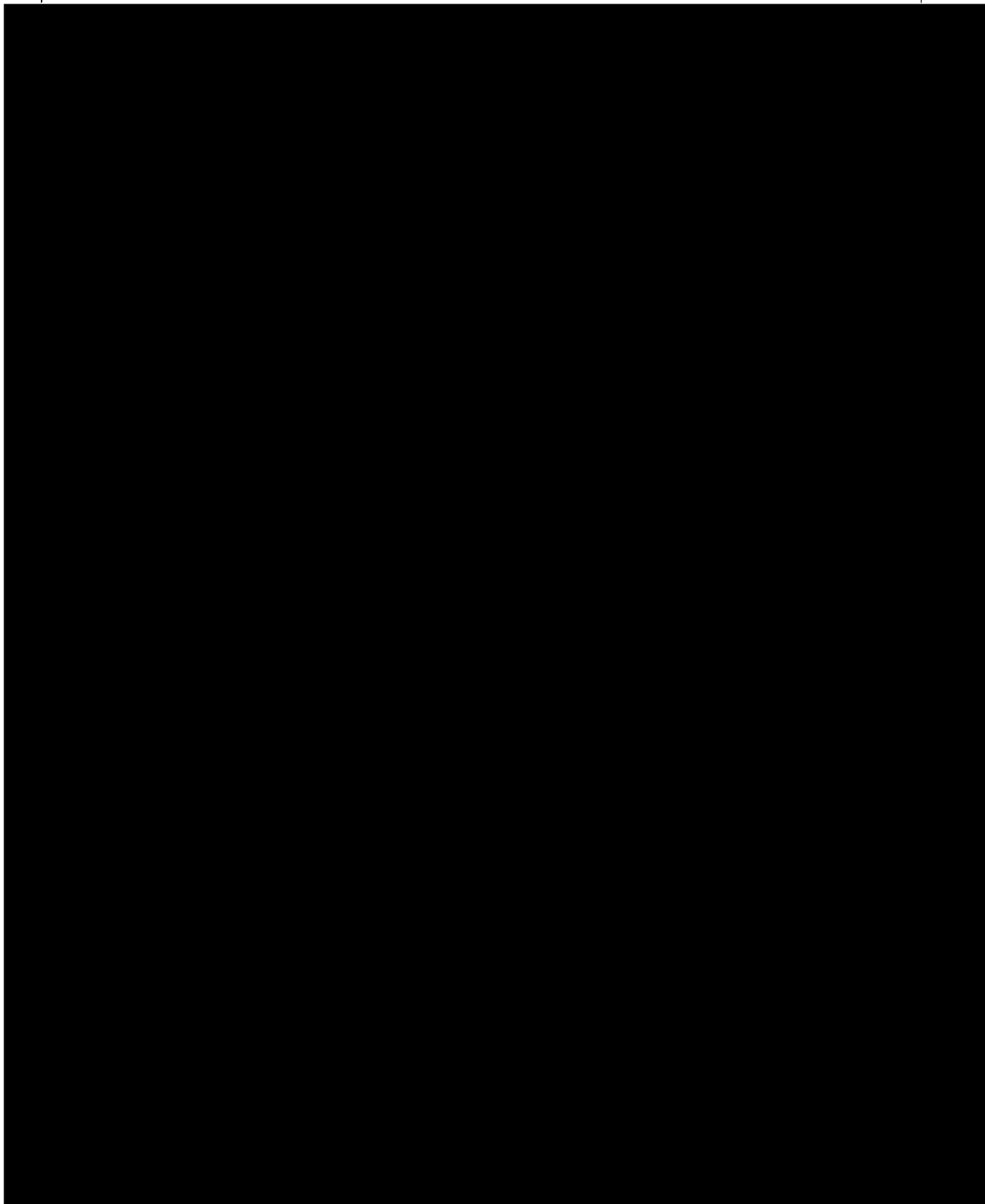
- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

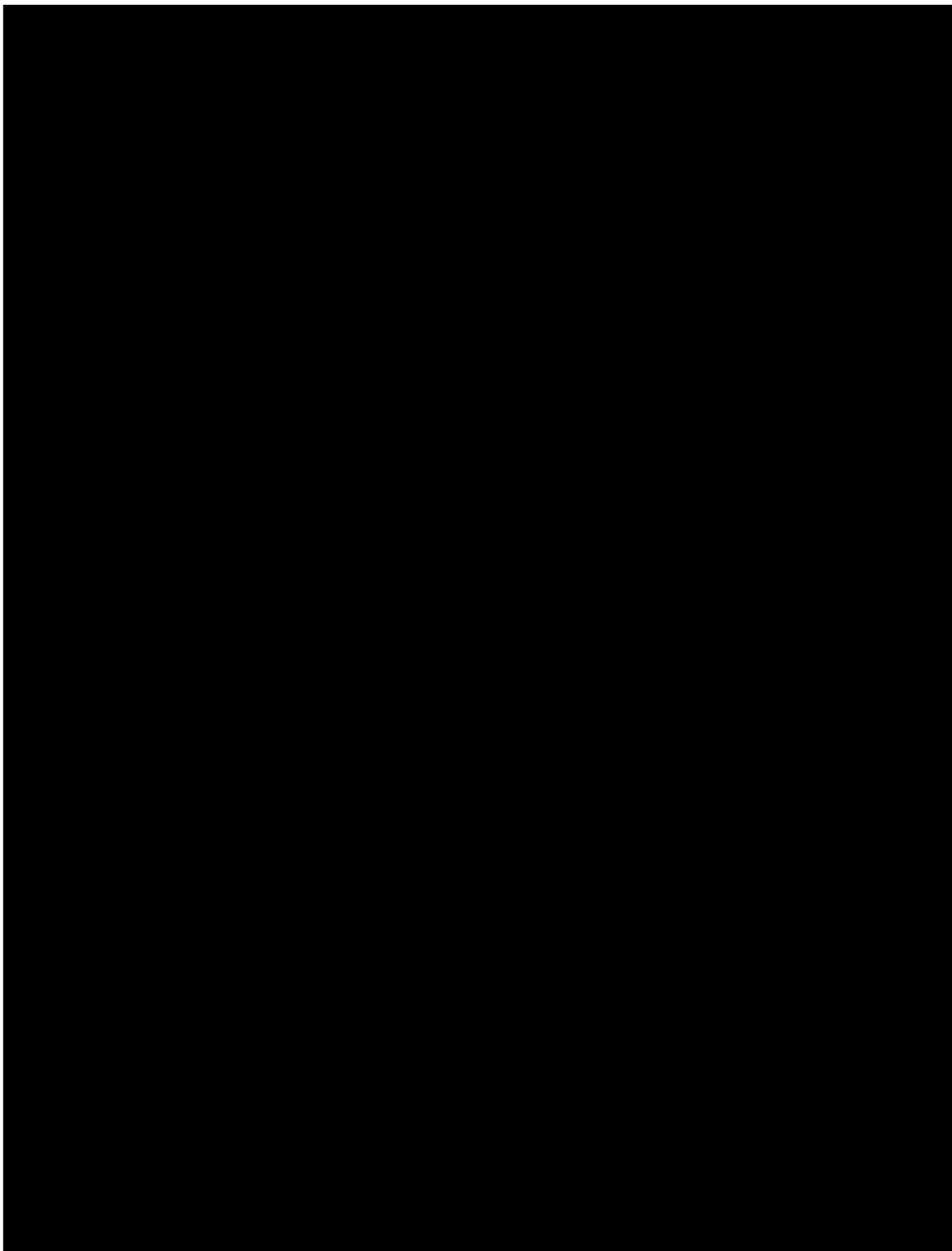
## 12.0 SECTION 25.53 DEFINITIONS

Term	Definition
<b>Annex</b>	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
<b>Drill</b>	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
<b>Emergency</b>	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
<b>Entity</b>	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<b>Hazard</b>	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
<b>Threat</b>	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

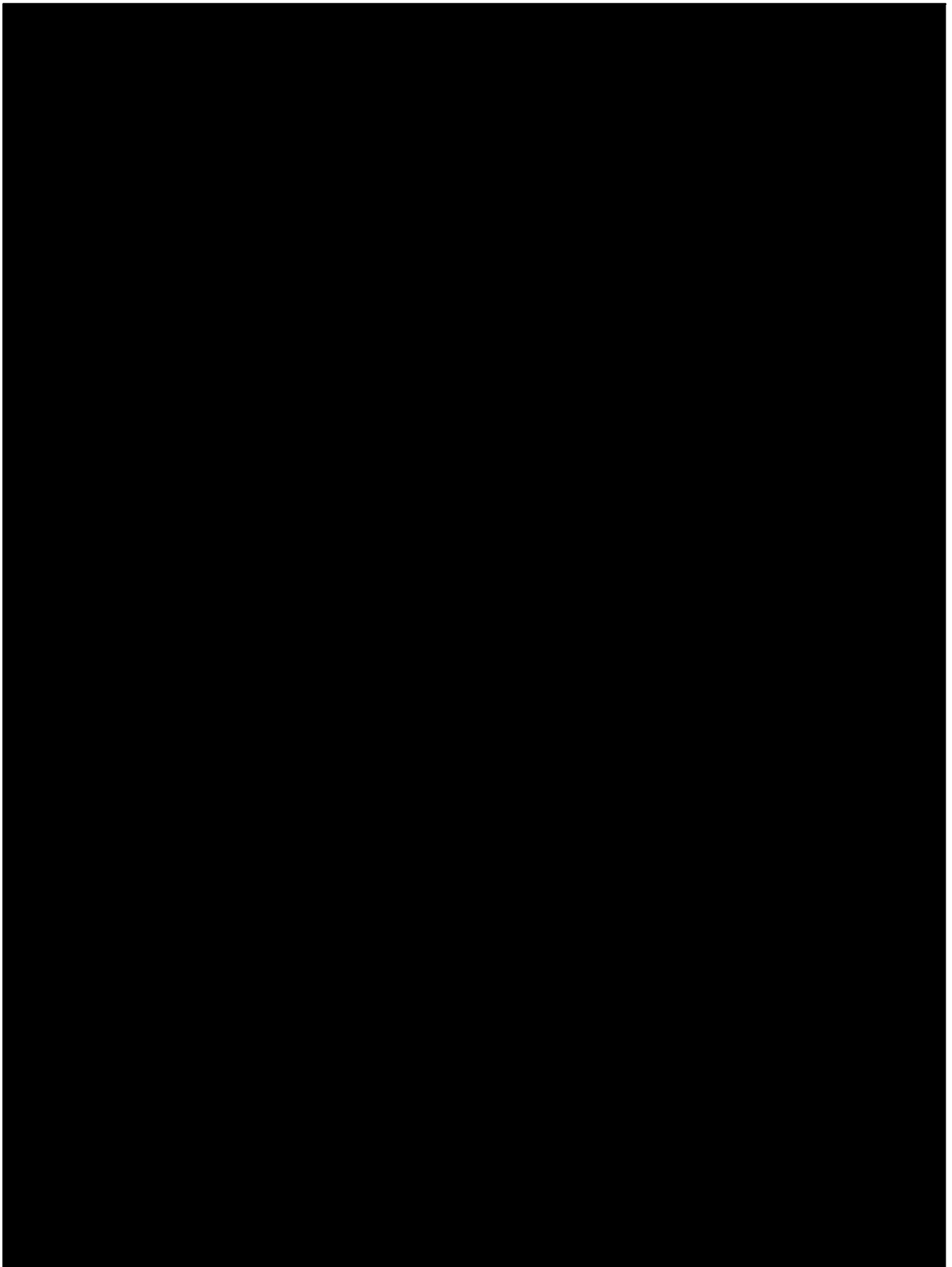
## DOCUMENT OWNERS

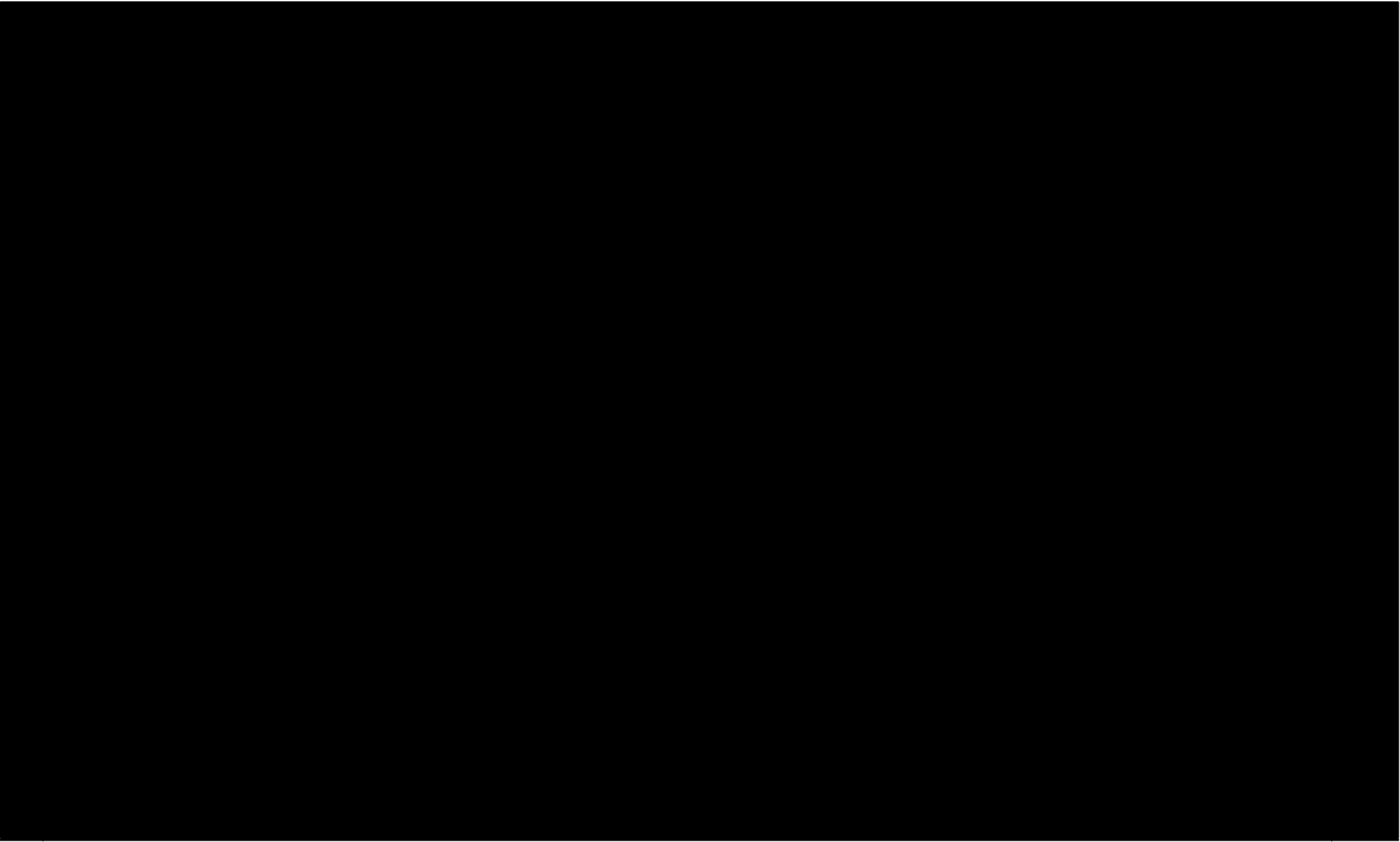












**ATTACHMENT 5: PRE-SUMMER CHECKLIST**

<b>Date performed</b>	
<b>Completed by (name)</b>	

Pre-Summer Checks	
<b>Instructions:</b> Check each item when complete and provide completed checklist to Facility Manager and Compliance Manager. Use blank lines to add items as needed.	
<input type="checkbox"/>	Complete the Hot Weather Equipment Inventory and submit to Facility Manager and Compliance Manager
<input type="checkbox"/>	Conduct facility summer readiness meeting to review the current EOP and hot weather events from the previous summer season.
<input type="checkbox"/>	Conduct annual hot weather readiness training and EOP drill with relevant operating personnel. Utilize and follow the annex during the training and drill. Collect on feedback on EOP content(if any) and, without unnecessary delay, provide Compliance Manager.
<input type="checkbox"/>	Review work orders for weed abatement and/or other hot weather preparedness preventative work (e.g., the removal of any bird or animal nesting in or around the high voltage substation) to confirm they are scheduled for completion, as needed, prior to the onset of the summer season.
<input type="checkbox"/>	Ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme heat weather events, including but not limited to scheduling and performing hot weather-related maintenance prior to the beginning of summer and increasing surveillance during extreme hot weather events by scheduling tasks in the work management system.
<input type="checkbox"/>	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements checking insulation thickness, quality, and proper installation, building entrances, etc.).
<input type="checkbox"/>	Notify the Compliance Manager in writing that weatherization work has been completed work and/or identify any exceptions and scheduled work to be performed to complete summer weatherization.

**ATTACHMENT 6: PRE-EVENT CHECKLIST**

<b>Date performed</b>	
<b>Completed by (name)</b>	

<b>Pre-Event Checklist</b>	
<b>Instructions: Check each item when complete and provide completed checklist to Facility Manager and Compliance Manager. Use blank lines to add items as needed.</b>	
<input type="checkbox"/>	Monitor weather and weather alerts. Note in shift logs when a hot weather advisory has been issued, and subsequently recalled or released.
<input type="checkbox"/>	Place severe weather protections in service where extreme hot weather could adversely impact Personnel, operations, or forced outage recovery (can include severe thunderstorms or monsoonal flooding).
<input type="checkbox"/>	Establish communications with to Operating Personnel on weather event conditions and discuss appropriate restrictions on maintenance to maximize generation capability.
<input type="checkbox"/>	Verify appropriate hot weather PPE for field personnel.
<input type="checkbox"/>	Review staffing plan (including supplemental coverage) and review/update emergency callout list as needed.
<input type="checkbox"/>	Monitor temperatures and take actions to limit or prevent impact impacts to instrumentation and equipment due to extreme heat.
<input type="checkbox"/>	Site Manager to schedule and conduct meeting with field personnel to discuss the weather forecast and to keep all personnel alerted to possible weather conditions.
<input type="checkbox"/>	
<input type="checkbox"/>	

**ATTACHMENT 7: EXTREME HOT WEATHER CHECKLIST**

<b>Date performed</b>	
<b>Completed by (name)</b>	

**ESCALATE AND REPORT KNOWN CRITICAL EQUIPMENT DEFICIENCIES  
IMMEDIATELY FOR ASSESSMENT**

<b>Extreme Hot Weather Checklist</b>			
<b>Instructions: Answer each item and provide completed checklist to Facility Manager and Compliance Manager. Use blank lines to add items as needed</b>			
<b>Item #</b>	<b>Item</b>	<b>Complete? Yes, No, or N/A</b>	<b>Notes Include any follow-up activity required.</b>
1.	Review outstanding preventative work orders and perform necessary and immediate work needed to protect the facility (e.g., weed abatement, fire prevention activities, flood preparation).		
2.	Establish staff responsibilities to monitor weather and weather alerts, as appropriate.		
3.	Establish communications with Personnel, including notification to Operating Personnel of potential plan outage, shutdown, or curtailment.		
4.	Check that all critical equipment is operating and protected per the manufacturer's recommendations during extreme heat or severe hot weather events. Emphasize the points at the facility where weed abatement and fire safety are necessary to protect critical equipment.		
5.	Refer to <b>Critical Equipment Matrix</b> (Attachment 3) and plan preventative and response actions based on forecasted conditions, which should include notifications to Personnel.		
6.	Monitor and address any bird or animal nesting in or around the high voltage substation.		
7.	Conduct site inspection. Check for extra precautions or outfitting of site components and/or critical equipment that may be impacted by exposure to elements checking insulation thickness, quality, and proper installation, building entrances, windows, etc.).		
8.	Check equipment inventory and replenish all quantities.		
9.	Refer to <b>Hot Weather Equipment Inventory</b> attachment. <u>Be sure to check all First Aid kits and confirm PPE "in use" dates.</u>		
10.			
11.			

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## **1.0 APPROVAL AND IMPLEMENTATION SECTION**

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### **A. Introduction and Applicability**

#### **1.1 Introduction**

This annex provides guidance and direction to Chisholm Grid, LLC (Chisholm) specific to pandemic and epidemic planning to address continuity and maintain essential functions and services during those events.

Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager

### **B. Roles and Responsibilities**

#### **1.2 Compliance Manager**

1.2.1 Role – The Chisholm compliance manager and owner of the EOP.

1.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised Plan, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Chisholm’s business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Maintains evidence.

#### **1.3 Facility Manager**

1.3.1 Role – the representative of the third-party vendor contracted to manage the performance of O&M services at the Chisholm Facility.

1.3.2 Responsibilities include:

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- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Oversee the day-to-day operation of the Chisholm facility.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Chisholm upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Chisholm upon completion and by the end of each calendar year.
- Provide evidence to Chisholm Compliance Manager upon completion and request.

**1.4 Field Services**

1.4.1 Role – Contracted to perform the O&M services at the Chisholm Facility.

1.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Assist in evaluation and escalation of potential incidents.
- Participate in training, drills, and post-incident reviews, as appropriate.

**1.5 Operating Personnel**

1.5.1 Role – The registered Generator Operator (GOP) for the Chisholm facility.

1.5.2 Responsibilities include:

- Assist in evaluation and escalation of potential incidents.
- Participate in training, drills, and post-incident reviews, as appropriate.

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**2.0 PANDEMIC THREAT LEVELS**

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The World Health Organization (WHO) defines a pandemic as a “worldwide spread of a new disease” where “the impact or severity tends to be higher...in part because of the much larger number of people...who lack pre-existing immunity to a new virus.” Examples of recent pandemic events include the H1N1 pandemic in 2009-2010, the Zika virus pandemic in 2016, and the COVID-19 Coronavirus pandemic starting in 2019.

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The pandemic threat levels are based on the WHO and US National Alert Stages and have been modified to fit Chisholm. The pandemic threat levels are based on the level of person-to-person transmission and how widespread the disease is in humans, as measured in the US transmittal rates. Planning and response measures are based on the pandemic threat level. Chisholm will consult with WHO, the Center for Disease Control (CDC), and the local and state health departments. Attachment 1 contains the Federal Government Response Stages matrix.

<b>Level 0 – Awareness</b>	No documented cases of person-to-person transmission.
<b>Level 1 – Cautionary</b>	Documented person-to-person transmission is rare.
<b>Level 2 – Serious</b>	Limited documented person-to-person transmission (Small Cluster).
<b>Level 3 – Severe</b>	Evidence of widespread person-to-person spread (larger or multiple clusters identified in the US) <b>AND</b> Limited person-to-person spread within city.
<b>Level 4 – Critical</b>	Increasing and sustained person-to-person transmission <b>AND</b> Multiple clusters of cases identified in two (2) or more countries or regions.

### 3.0 CRISIS TEAM

To facilitate Chisholm's response to a pandemic, Chisholm will establish a cross-functional crisis team comprised of representatives of Human Resources, Compliance Manager, Facility Manager, and others, as needed. The Compliance Manager will lead the team, which is charged with evaluating relevant information, assessing impact to Chisholm operations, developing appropriate responses to actual and potential developing threat, and communicating per established periodicities with staff.

### 4.0 PANDEMIC DISEASE CONTAINMENT/CONTROL STRATEGIES

Government and health departments will publish the actions they are taking to implement disease containment strategies. Chisholm will use this published information and factor the potential impacts on both business and Bulk Power System operations. Chisholm may choose to implement any number of containment strategies and to recommend these strategies to their personnel, as appropriate. Strategies may include the following:

- **Isolation** - Separation of persons with specific infectious illnesses in their homes, in hospitals, or in designated healthcare facilities.
- **Quarantine** - Separation and restriction of the movement while not yet ill, have potentially been exposed to an infectious agent.
- **Social Distancing** - Social distancing measures could take the form of modifying the frequency and type of face-to-face employee encounters (e.g., placing moratoriums on handshaking, substituting teleconferences for face-to-face meetings, staggering breaks, posting infection control guidelines); establishing flexible work hours or worksite; and

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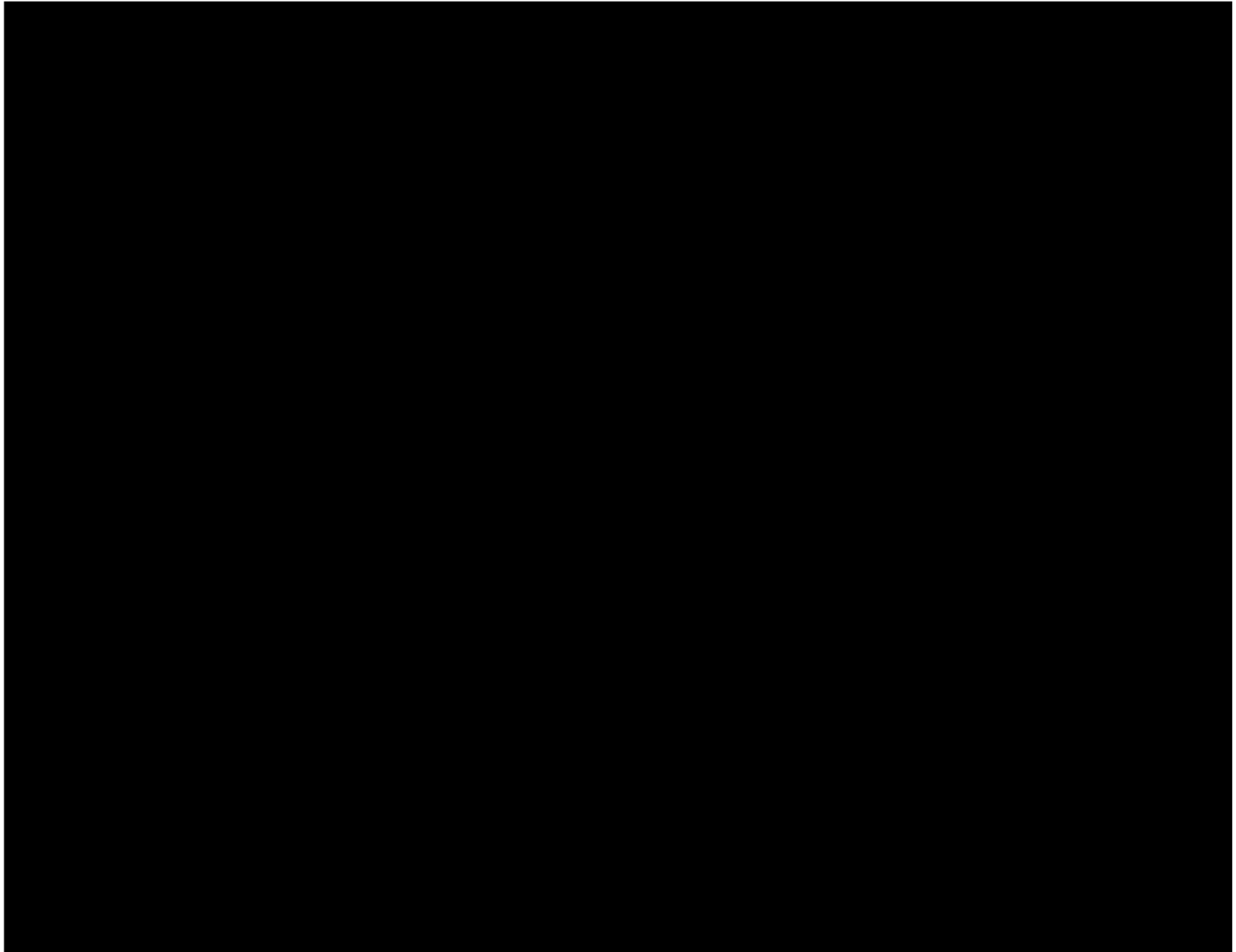
implementing strategies that request and enable employees to stay home at the first sign of symptoms.

The use of these strategies, along with enhanced hygiene etiquette and the cancellation of non-essential activities to reduce the potential for transmission rates, will be evaluated for use throughout the duration of the pandemic event.

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**5.0 ESSENTIAL ROLES AND PERSONNEL**

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**6.0 PLANNING ASSUMPTIONS**

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Listed below are the overarching organizational planning assumptions.

- Federal, State, and Local government will provide guidance and/or direction regarding current pandemic status.
- Chisholm will evaluate all available information published during a pandemic to determine appropriate response and actions.

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- The Chisholm facility will be accessible, but right of entry may be limited to essential personnel.
- Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.
- Travel restrictions, such as limitations on mass transit, implemented at the Federal, State, tribal, territorial, and local levels may affect the ability of some staff to report to work.
- Additional funding may be required for the acquisition of additional equipment, whether Personal Protective Equipment (PPE) or other equipment identified during an event (e.g. face mask, cleaning supplies and test kits as applicable).

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**7.0 RESOURCES AND RELATED REFERENCES**

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**Chisholm Emergency Operations Plan**

**Chisholm Cyber and Physical Security Incident Annex**

**Chisholm Cold Weather Annex**

**Chisholm Hot Weather Annex**

**Centers for Disease Control**

**Pandemic resources webpage:** <https://www.cdc.gov/flu/pandemic-resources/index.htm>

**National Strategy Planning webpage:**

<https://www.cdc.gov/flu/pandemic-resources/planning-preparedness/national-strategy-planning.html>

**NERC COVID-19 webpage:** <https://www.nerc.com/news/Pages/COVID-19.aspx>

**World Health Organization**

<https://www.who.int/emergencies/diseases/en/>

**Health and Human Services**

- **Pandemic Influenza Preparedness Response and Recovery Guide for Critical Infrastructure and Key Resources**

<https://asprtracie.hhs.gov/technical-resources/resource/1978/pandemic-influenza-preparedness-response-and-recovery-guide-for-critical-infrastructure-and-key-resources>

**Texas Health and Human Services – Health Alerts & Advisories webpage:**

<https://dshs.texas.gov/news/alerts.aspx>

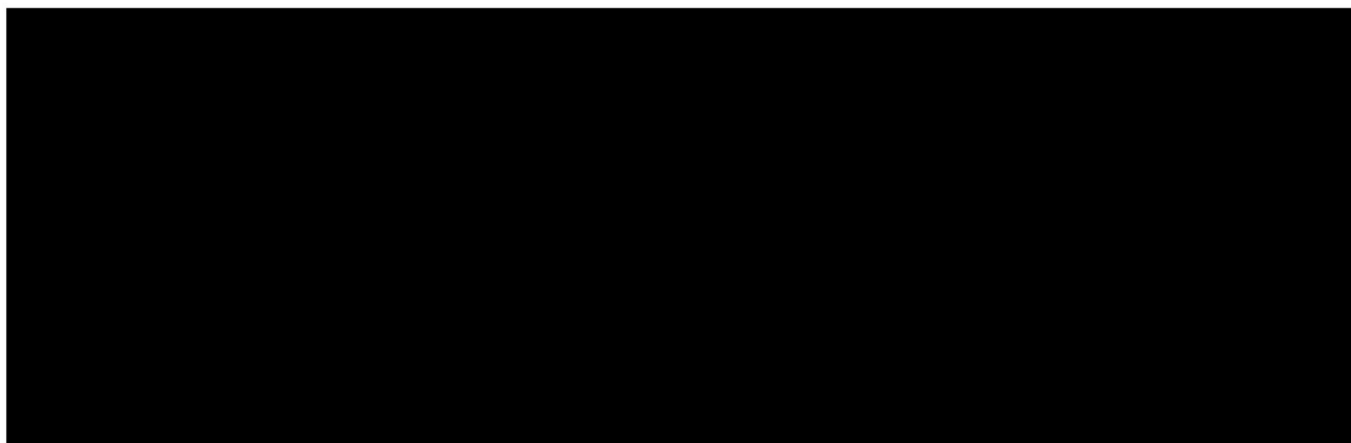
**Tarrant County Public Health Department webpage:**

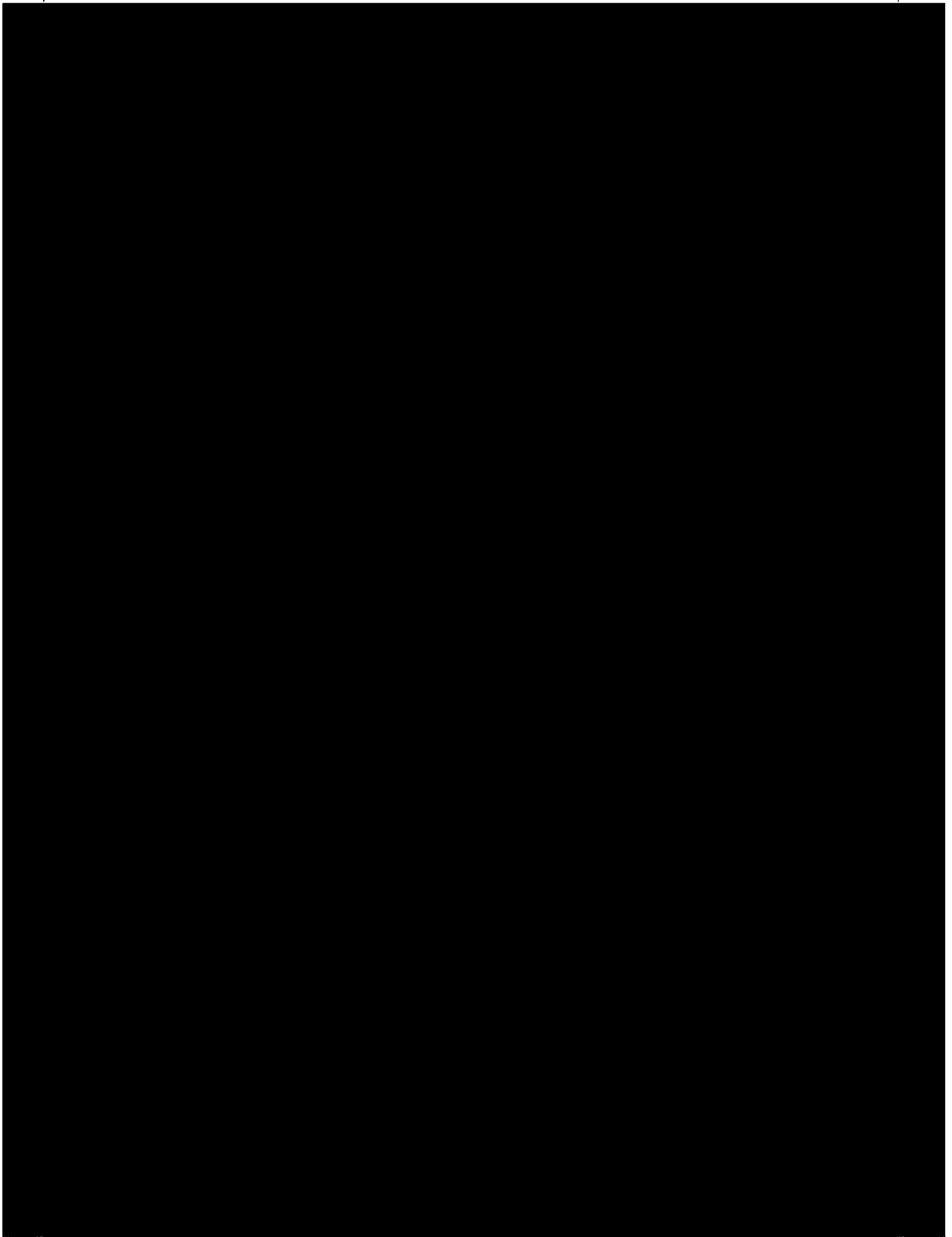
<https://www.tarrantcounty.com/en/public-health.html>

## 8.0 SECTION 25.53 DEFINITIONS

Term	Definition
<b>Annex</b>	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
<b>Drill</b>	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
<b>Emergency</b>	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
<b>Entity</b>	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<b>Hazard</b>	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
<b>Threat</b>	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

## DOCUMENT OWNERS





## ATTACHMENT 1: WHO PHASES AND GOVERNMENT RESPONSE STAGES

Taken from *Pandemic Influenza: Preparedness, Response, and Recovery; Guide for Critical Infrastructure and Key Resources*

(<https://www.dhs.gov/sites/default/files/publications/cikrpandemicinfluenzaguide.pdf>)

WHO Phases		Federal Government Response Stages	
INTER-PANDEMIC PERIOD			
1	No new influenza virus subtypes have been detected in humans. An influenza virus subtype that has caused a human infection may be present in animals. If present in animals, the risk of human disease is considered to be low.	0	New domestic animal outbreak in at-risk country
2	No new influenza virus subtypes have been detected in humans. However, a circulating animal influenza subtype poses a substantial risk of human disease.		
PANDEMIC ALERT PERIOD			
3	Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.	0	New domestic animal outbreak in at-risk country
		1	Suspected human outbreak overseas
4	Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.	2	Confirmed human outbreak overseas
5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).		
PANDEMIC PERIOD			
6	Pandemic phase: increased and sustained transmission in general population.	3	Widespread human outbreaks in multiple locations overseas
		4	First human case in North America
		5	Spread throughout United States
		6	Recovery and preparation for subsequent waves

**ATTACHMENT 2: PANDEMIC PLANNING CHECKLIST**

**Instructions:** Use this checklist to start the planning and response processes. Add items, as needed.

<b>Evaluate</b>	
<b>Check when complete</b>	<b>Item</b>
	Identify and gather members of the Pandemic Crisis Team
	Collect information on the status of pandemic from trusted and verified sources.
	Evaluate the need to obtain and distribute additional Personal Protective Equipment (PPE)
	Determine potential impacts to staffing and operations of the site

<b>Communicate</b>	
<b>Check when complete</b>	<b>Item</b>
	Provide guidance to personnel on personal contact policy and protective measures
	Communicate staffing changes for pre-determined period to prevent spread, contain infection, etc.
	Establish a set schedule for communications