



## **Filing Receipt**

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## Emergency Operating Plan Executive Summary

This Emergency Operations Plan (EOP) applies to Axpo U.S. LLC (Axpo), which is registered with the Public Utility Commission of Texas (PUCT) as an Option I Retail Electric Provider (REP), REP Certificate No. 10312. The purpose of this EOP is to detail the requirements and actions for emergency operations and to communicate emergency operational procedures to Axpo employees. The EOP is provided to all Axpo employees to promote safety, responsiveness, reliability, and continued operations during emergency situations.

### A. Contents and Policies in EOP

Pursuant to § 25.53(d), Axpo's EOP is included as Attachment A.

The following table outlines the specific sections and page numbers of the EOP that correspond with the requirements of § 25.53:

REQUIREMENTS	REFERENCE
25.53(c)(1)(A)(II) Emergency Operations Plan	Attachment A
25.53(c)(1)(A)(III) and (c)(4)(A) Record of Distribution	Executive Summary, Section B
25.53(c)(1)(A)(i)(IV) and (c)(4)(C) Affidavit	Executive Summary, Section C
25.53(c)(4)(B) Emergency Contact List	EOP Section 1.0, page 1
25.53(d)(1) Approval & Implementation	EOP Section 2.0, page 1
25.53(d)(2)(C) Communications Plan	EOP Section 3.0, page 2
25.53(d)(3) Emergency Supplies	EOP Section 4.0, page 2
25.53(d)(4) Emergency Staffing	EOP Section 5.0, page 2
25.53(d)(5) Identifying Weather-related hazards	EOP Section 6.0, page 3
25.53(c)(3) Annual Review	EOP Section 8.0, page 3
25.53(f) Drills	EOP Section 9.0, page 4
25.53(g) Reporting Requirements	EOP Section 10.0, page 4
25.53(e)(3)(A) Pandemic and Epidemic Annex	EOP Appendix A, page 5
25.53(e)(3)(B) Hurricane Annex	EOP Appendix B, page 9
25.53(e)(3)(C) Cyber Security Annex	EOP Appendix C, page 10
25.53(e)(3)(D) Physical Security Incident Annex	EOP Appendix D, page 11

## B. Record of Distribution

Pursuant to § 25.53(c)(1)(A)(III) and (c)(4)(A), as of the date of submission, all current Axpo employees have received a copy of the EOP. A training on the EOP was held on 02/29/2024. Axpo provides the EOP to all new employees during the first week of employment.

Employee Name	Title	Date of Access or Training
Kamal Khoury	Managing Director	03/04/2024
Lucas Dupay	Trader	03/04/2024
Seth Greengrass	Head of Legal & Compliance	03/04/2024
Joseph Cattano	Director of Operations	03/04/2024
Karina Pernicano	Office manager	03/04/2024

## C. Affidavit

The affidavit required by § 25.53(c)(1)(A)(i)(IV) and (c)(4)(C) is attached to this Executive Summary.

## AFFIDAVIT

STATE OF New York       §  
                                     §  
COUNTY OF New York   §

Before me, the undersigned authority, on this day personally appeared Kamal Khoury to me known to be the person whose name is subscribed to the foregoing instrument, who being duly sworn according to law, deposes and says:

1. My name is Kamal Khoury. I am the Managing Director of Axpo U.S. LLC ("Axpo") and the highest-ranking officer with binding authority over Axpo.

2. I swear or affirm that in my capacity as Managing Director of Axpo, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed into Project No. 53385.

3. Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel have been 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.

4. The EOP has been reviewed and approved by the appropriate executives.

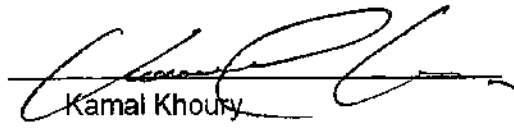
5. Axpo intends to conduct a drill consistent with subsection (f) of PUC Subst. R. § 25.53 during this calendar year and will provide notice to PUC Staff at least 30 days before that drill is conducted.

6. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

7. Axpo maintains a business continuity plan addressing return to normal operations after disruptions caused by an incident.

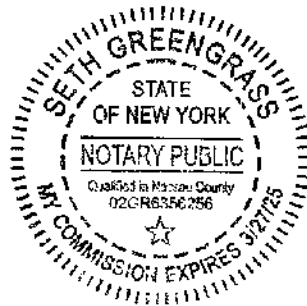
8. Axpo does not have any emergency management personnel designated to interact with local, state, and federal emergency management officials during emergency events. Any future emergency management personnel designated will complete the required latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training prior to interacting with any of the designated officials during an emergency.

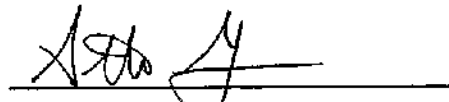
9. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief.



Kamal Khoury  
Managing Director  
Axpo U.S. LLC

SWORN TO AND SUBSRIBED TO ME on the 29 day of February, 2024





Notary public in and for the  
State of New York

My Commission Expires:  
03/27/2025