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PROJECT NO. 53385

JACK COUNTY POWER, LLC EMERGENCY OPERATIONS PLAN ("EOP")

REDACTED VERSION

Date of Approval: March 6, 2024

Version: 2024-1

Change History:

This EOP was most recently approved by Jack County Power, LLC ("Jack County") on March 6, 2024.

Jack County adopted the relevant portions of the EOP of Brazos Electric Power Cooperative, Inc. applicable to its generation facilities. This EOP applies that adoption in relevant part. Because this is Jack County's initial EOP filing, the requirement set forth in 16 TAC § 25.53(d)(1)(C) to include a revision control summary that lists dates of previous changes made to the EOP since the initial EOP filing is inapplicable to this filing.

This EOP shall be reviewed at least once per calendar year and shall be updated within 60 days of the date of any significant change in Jack County's facilities, Jack County's operational processes or NERC Reliability Standards or other applicable rules or laws which affects the EOP. Revisions to the EOP shall be provided to the PUCT and other appropriate entities as required by NERC Reliability Standards and ERCOT Protocols.

1. EXECUTIVE SUMMARY

1.1 EOP Table of Contents, Requirement Mapping and Summary

#	Item	PUCT rule cite	Summary	Notes	Confidential?	Location	Page
1	Executive Summary	25.53(c)(1)(A)(i)(1)	Description of the contents and policies contained in the EOP			Section 1.1	3
2	Executive Summary	25.53(c)(1)(A)(i)(ll)	Reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule			Section 1.1	3
3	Executive Summary (EOP Access, Distribution and Training)	25.53(c)(1)(A)(i)(III) , (c)(4)(A)	Record of distribution required under paragraph (4)(A). A record of distribution that contains the following information in table format: (i) title and names of persons in the entity's organization receiving access to and training on the EOP; and (ii) dates of access to or training on the EOP, as appropriate			Section 1.2	6
4	Executive Summary (Affidavit)	25.53(c)(1)(A)(i)(IV) , (c)(4)(C)	Affidavit required under paragraph (4)(C) signed by entity's highest-ranking representative			Section 1.3	7
5	Approval and implementation	25.53(d)(1)(B)	Individuals responsible for maintaining and implementing the EOP, and those who can change the EOP			Section 2.2	9
6	Approval and implementation	25.53(d)(1)(C)	Revision control summary that lists the dates of each change made to the EOP since the initial EOP filing	N/A (because this is the first EOP filed by Jack County, no changes have yet been made to the EOP)			
7	Approval and implementation	25.53(d)(1)(D)	Dated statement that the current EOP supersedes previous EOPs	N/A (because this is the first EOP filed by Jack County, previous EOPs do not exist)			

8	Approval and implementation	25.53(d)(1)(E)	Date the EOP was most recently approved by the entity	Cover Page	
9	Approval and implementation	25.53(d)(1)(A)	Introduces the EOP and outlines its applicability	Section 2,1	9
10	EOP Activation	25.53(d)(5)	Process the entity follows to activate the EOP	Section 2.4	10
11	Emergency contacts	25.53(c)(4)(B)	Emergency contacts, including identification of specific individuals who can immediately address urgent requests and questions from the Commission during an emergency	Section 3	11
12	Pre-identified supply plan	25.53(d)(3)	A plan to maintain pre-identified supplies for emergency response	Section 4	12
13	Staffing plan	25.53(d)(4)	A plan that addresses staffing during emergency response	Section 5; Appendix 1	13
14	Communications	25.53(d)(2)(B)	Procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator	Annex 1	14
15	Pandemic and epidemic	25.53(c)(2)(D)	Pandemic and epidemic plan	Annex 2; Appendix 2	15
16	Cyber security	25.53(c)(2)(F)	Cyber security plan	Annex 3	16
17	Physical security incident	25.53(c)(2)(G)	Physical security incident plan	Annex 4; Appendix 3	18
18	Plan for weather-related hazard identification	25.53(d)(5)	Addresses tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding	Annex 5	19
19	Weather Emergency	25.53(c)(2)(A)(i)	Operational plans for responding to a cold or hot weather emergency, distinct from	Annex 5	19

			the weather preparations required under §25.55 of this title			
20	Weather Emergency	25.53(c)(2)(A)(ii)	Verification of the adequacy and operability of fuel switching equipment, if installed		Annex 5	19
21	Weather Emergency	25.53(c)(2)(A)(iii)	Checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency		Annex 5; Appendix 1	19
22	Water Shortage	25.53(c)(2)(B)	Addresses supply shortages of water used in the generation of electricity		Annex 5	19
23	Restoration of Service	25.53(e)(2)(C)	Plans intended to restore to service a generation resource that failed to start or tripped offline due to a hazard or threat		Annex 6	23
24	Hurricanes	25.53(c)(2)(E)	Includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone	N/A (not located in a TDEM hurricane evacuation zone)		

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1.2 Record of Distribution

The following personnel have been provided with access to and/or training on the EOP:

Jack County Staff (electronic access and/or paper copies, training as needed by role):

Name	Title	Access Date	Training Date ¹

¹ Refers to training conducted for this plant under the substantially similar Brazos Electric Power Cooperative, Inc. EOP, which was adopted by Jack County in relevant part in its Power Generation Company registration form approved by the PUCT on May 24, 2023.

1.3 EOP Affidavit (see attached)

STATE OF <u>New York</u> § COUNTY OF <u>New York</u> §

BEFORE ME, the undersigned authority, on this day personally appeared Nathan Hanson, who, having been placed under oath by me, did depose as follows: "My name is Nathan Hanson. I am the President of Jack County Power, LLC ("Jack County"). I affirm that the following statements are true and complete, to the best of my knowledge and belief:

- 1. I am the highest-ranking representative, official, or officer with binding authority for Jack County;
- 2. Relevant Jack County operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
- 3. The Jack County EOP has been reviewed and approved by the appropriate executives;
- 4. Drills have been conducted to the extent required by subsection (f) of PUCT Subst. R. 25.53;
- 5. The Jack County EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- 6. Jack County maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- 7. Jack County's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Tu th

Nathan Hanson

SUBSCRIBED AND SWORN TO BEFORE ME by the said Nathan Hanson this (1) day of March, 2024.

tary Public, State of New York jenni nash Notary Public - State of New York No. 01NA0002298 Qualified in Queens County My Commission Expires 03/06/2027

2.0 APPROVAL AND IMPLEMENTATION

2.1 Purpose

The purpose of this Emergency Operations Plan ("EOP") is to specify the organization, responsibilities and actions to be taken during system emergencies that may arise impacting Jack County. System emergencies include adverse operating situations due to severe weather, physical or cyber-attack, or other causes that pose a threat to the reliable operations of Jack County generation facilities.

2.2 Organization and Responsibilities

A full table of contents and summary of the various sections and annexes of the EOP are provided in Section 1.1. The Plant Manager is responsible for the conduct of this EOP and approves all changes. The Plant Manager shall be responsible to maintain, update, and manage revision control, as needed, of the EOP and all associated files. Comments concerning this EOP and requests for copies may be addressed to the Plant Manager. The Jack County Energy Manager² control room is currently staffed with at least one on-duty System Operator for its real-time desk. If conditions warrant, additional System Operators may be called. If there is a potential issue with communications or with control system equipment, the associated support staff may be put on alert or called to service as deemed necessary by the on duty System Operator. The Jack County Energy Manager's control conly required support and management personnel are present in the Energy Manager's control center during a capacity or energy emergencies.

2.3 Action

Operation of the Jack County plant during emergency or adverse conditions shall be conducted in accordance with operational procedures of the ERCOT reliability region. Jack County shall comply with reliability directives issued by ERCOT unless such actions would violate safety, equipment, regulatory or statutory requirements. Under these circumstances, ERCOT or other authorized entity shall be immediately informed of the inability to perform the directive so that alternate actions can be implemented. ERCOT or other authorized entity and any other potentially impacted neighbors or interconnected entities shall be informed of real-time or anticipated emergency conditions, and take actions to avoid, when possible, or mitigate the emergency. Jack County shall comply with the directives of ERCOT or other authorized entities, based on the next day assessments in the same manner in which Jack County would comply during real time operating events.

² "Energy Manager" refers to Jack County's qualified scheduling entity as designated with ERCOT.

Detailed plans and procedures cannot anticipate all possible scenarios; therefore, the guidelines presented in this EOP may be adapted as necessary to resolve the emergency at hand. System Operators will issue instructions to field personnel as needed to perform any necessary actions.

During system emergency operating conditions or emergency short supply conditions, the Jack County Energy Manager operator responsible for the generation desk shall make available to ERCOT all uncommitted resources available in the time frame of the emergency. The Energy Manager operator shall not remove a resource from service without coordinating the removal with ERCOT.

During a system emergency event, Jack County may be requested by the PUCT or other regulatory agencies to provide periodic updates on the status of operations, outages, and restoration efforts until all event-related outages are restored or unless otherwise notified by the requesting agency. The PUCT or other agencies may also request submission of an event action report or lessons learned report.

Jack County maintains additional procedures in other annexes of this EOP to address operating emergencies. Additional operating procedures for the Jack County Energy Manager are maintained in the control room that address system black start restoration, geomagnetic disturbance operating plan, emergency ties, block load transfers and generation desk operations. If required, procedures to address remedial action plans or plans to address Interconnection Reliability Operating Limits (IROLs) or Generic Transmission Limits (GTLs) associated with Jack County facilities would be developed and made available in the control room for the Energy Manager.

2.4 Activation of EOP

The Jack County Plant Manager or their designee is responsible for activating the EOP and determining what actions to take immediately following the occurrence of the events outlined in the EOP. The Plant Manager is responsible for determining the appropriate degree of overall response required and implementing those appropriate actions.

3. EMERGENCY CONTACTS



4. PRE-IDENTIFIED SUPPLY CHAIN

General procedures for addressing required supplies during emergency events.

In general, the Jack County plant will perform annual checks for supplies required during various emergency conditions. The key focus will be to ensure food, water, cots, etc. are available for personnel that may be staying extended periods at the plants. In addition, options to rotate personnel will be monitored as conditions allow.

Plant management will review any key items such as fuel oil, hydrogen, chemicals, etc. that may be required to carry through an emergency period during the pertinent seasonal readiness preparation. Arrangements will be made to support having items delivered during adverse weather conditions.

Jack County plant staff will also comply with the more specific emergency preparation and response protocols included in the Jack County Winter Weather Readiness form, included as Appendix 1 to this EOP, as applicable during cold weather emergencies. Other emergencies will be handled via communications with personnel and Jack County management.

5. EMERGENCY STAFFING PLAN

Emergency events may require special staffing needs depending on the specifies of the emergency. Each plant has local procedures to handle the requirements for various emergency conditions. The emergencies include but are not limited to fires, severe storms, extreme hot weather, extreme cold weather, plant outages, etc. Each of these events will be reviewed for personnel skillsets, quantity, and duration to determine how to utilize existing and contractor resources.

During the course of an emergency event, the Jack County Plant Manager will evaluate the particular staffing needs of the event and will determine the appropriate staffing levels needed to manage the event response. This could include the following as necessary:

- Notifying additional Jack County plant management and employees to respond to the site to support the event response.
- Procuring contracted support companies to support the plant-led event response with additional manpower and/or equipment as required.

Additionally, refer to Section 5.3.9 of the Jack County Winter Weather Readiness procedure, attached as Appendix 1 to this EOP, for additional staffing procedures applicable during cold weather emergencies.

ANNEX 1 Emergency Communications

The following individuals are designated support personnel to assist in phone communications with Jack County's TSPs should this EOP be implemented by the Plant Manager.

Phone Communications Support			

The individuals will be contacted in the order shown. Each individual will be responsible for his/her own transportation to the Jack County power station. If necessary and possible, Jack County will assist with providing transportation.

Insofar as possible, the order of individuals on the list will be rotated after each implementation of the EOP (which may be for more than one day) or annually, whichever occurs first. In addition, other key Jack County personnel may be called upon to support implementation of the EOP. A copy of the key personnel contact list is shown in Section 5 and a current electronic copy of the list is maintained by the Plant Manager in a document folder accessible by the control room personnel.

Regulatory and emergency coordination contacts (e.g., PUCT, OPUC, local and state governmental entities and officials, emergency operations centers, media) will be notified as deemed necessary by the Asset Manager or his designee. Current contact information is available on these entities websites.

Fuel supplier contact information is not maintained within the EOP because fuel providers change over time. The Jack County Power team, LS Power, and Energy Manager will handle fuel supply coordination.

Events that meet the Event Reporting Operating Plan adopted under NERC Standard EOP-004 shall be reported in a manner consistent with that Plan.

Note: Contact with ERCOT (reliability coordinator) personnel is addressed throughout the EOP and varies based on the emergency conditions present.

ANNEX 2 Pandemic Plan

Jack County staff shall fully adhere to the EthosEnergy Pandemic Preparedness and Response Plan attached to this EOP as Appendix 2.

ANNEX 3

Cyber Security

A. INTRODUCTION

This annex summarizes best practice information and procedures designed to mitigate the risk of cyber security attack.

Jack County Cyber Security Posture:

- Comprehensive program: In addition to its corporate cyber security program, Jack County complies with NERC Critical Infrastructure Protection standards in effect covering topics such as network protection, physical security, information protection, training, vulnerability assessments and incident response plans.
- Jack County SMEs participate in many working groups at the national and state level regarding cyber security.
- Jack County monitors multiple sources to anticipate and identify new threats.

B. LAYERS OF CYBER SECURITY

Jack County implements the following layers of security for its systems:

- Multiple firewalls between DCS and SCADA environments with least privilege access policies.
- Firewall AV scans for web traffic and malicious files
- Email AV scans on SPAM prevention server
- Users do not administrative access to local desktops and laptops to install software
- Malware software prevents mail cloud and corporate blocked applications from being installed.
- Endpoint AV and Malware scanner scans incoming files for malicious agents/software.
- Anti-exploit and ransomware protection software installed on computers.
- Additional firewalls are implemented between office and SCADA environments.

C. INDUSTRY RECOMMENDATIONS AND JACK COUNTY'S RESPONSES

Jack County implements the following best practices:

Recommendation	Homeland Security	NERC	Implemented by Jack County
Implement Application Whitelisting	X		X

Implement Patch and Configuration Management	X		Х
Manage Authentication	X		X
Monitor And Respond	X		X
Reduce Your Attack Surface	X		X
Build Security Trust Rings	X	X	X
Implement Secure Remote Access	X	X	X
Develop secondary communication strategies		X	X
Drill scenarios where individuals can interact with an HMI		X	x
Review ability to rapidly disable remote access		X	X
Review Response Plans		X	X
Employee Training Program			X
Maintain Good Backups			X
Memory Protection			X
Phish Testing/Training Program			X
Security Awareness Program			X
Use Next Generation Firewall Features to Block regions and applications			X

D. ADDITIONAL PROTECTIONS

Jack County's cyber security posture is constantly evolving in the face of new threats. Additional measures taken include:

- Vet Files Check hash and scan files from 3rd parties before moving to the control network
- Review PoLP for Administrative System Tools Review access and ensure application of the PoLP (principle of least privilege) for control system administrative tools
- Abnormal Activity Monitoring
- Regular phishing awareness campaigns for employees
- Procurement of a cyber-insurance policy which includes forensics and recovery support in the event of an attack

ANNEX 4 Physical Security Incidents

Jack County shall follow the plans and procedures outlined in the Event Reporting Operating Plan adopted under NERC Standard EOP-004 (included as Appendix 3 to this EOP) for all physical security incidents.

ANNEX 5 Severe Weather and Water Shortage

A. Severe Weather Plans

Jack County's plant management and maintenance personnel will conduct meetings seasonally and as needed to discuss, plan and prepare for the upcoming hot/cold weather season. A weather readiness evaluation list will be created and used by plant personnel that includes a list of critical equipment to be checked, repaired and or replaced. Upon completion, maintenance personnel will review and report on the maintenance activities performed and then the maintenance superintendent and plant manager will verify and sign off on the completed work.

Jack County plant personnel will identify and address any known critical failure points, including those effects of weather design limits. A complete list of components and work orders will be generated each season for checking the operations of critical components and where needed the replacement of worn elements and related components such as wiring, connections, and insulation.

Plant management and maintenance personnel shall ensure seasonal plant readiness of critical operating systems (including items found in the previous paragraph), cooling and heating equipment, critical elements, personnel, supplies and weather related safety training. Plans are executed prior to June 1 annually for the summer months, typically right after the spring maintenance outages, and again prior to December 1 for the upcoming winter months, typically right after the fall maintenance outages.

Jack County will monitor Lake Bridgeport water levels and update ERCOT as needed of any shortages of water supplies that may affect the reliability of any of Jack County's resources. If an emergency shortage of water from municipalities is noticed, Jack County will notify ERCOT as soon as possible.

Jack County plant management will keep plans for addressing emergency events, such as forced outage, sabotage, extreme heat or cold situations and injuries. These plans and associated procedures will include actions to be taken by plant personnel for each type of emergency event and emergency contacts.

The Jack County generating facilities have a plan to address wildfire threats and conditions. As part of the plan during drought and fire related seasons, plant personnel will monitor for wildfire and wildfire conditions including prevailing winds blowing toward the plant. Plant personnel will also monitor plant grounds and the immediate areas for warnings of wildfire conditions and by monitoring notification given by official authorities. Upon receipt of such notification or if a wildfire becomes present in the surrounding plant areas, the plant personnel will implement its wildfire plan that includes but not limited to plant shut down procedures, emergency contacts, system control center notifications, relocation point for plant employees upon the evacuation of the plant site.

B. Power Plant Weatherization

March:

- Survey fuel oil inventory and initiate purchasing procedures to fill storage tanks as needed to maintain appropriate levels determined by Jack County management
- Test fuel oil for proper biocide and CFPP levels increase additives as necessary
- Review for extreme hot weather impacts review plant extreme hot weather items list as identified in each plant's procedures.

April:

- Complete a review of any outstanding winter issues that may have occurred during the previous winter period. Initiate efforts to resolve all extreme cold weather items by December 1
- Complete open items that support the extreme hot weather prior to June 1
- Update on any incomplete extreme hot weather preparedness efforts during weekly generation calls and provide expected completion time

May:

- Certify that the extreme hot weather readiness efforts are complete before June 1
- Verify proper staffing as may be required during the extreme hot weather period
- Initiate the plant procedures for extreme hot weather preparation. This includes HVAC units in equipment buildings, inlet cooling system, transformer top oil temperature monitored, equipment heating, etc.

June:

- Submit summer weatherization readiness report to ERCOT on or before June 1
- (Summer run)

July:

• (Summer run)

August:

• (Summer run)

September:

- Complete open items that support the extreme cold weather prior to December 1
- Prepare work orders for needed work.
- Inventory fuel used for portable heaters; provision as necessary.
- Inventory freeze protection preparedness materials; order as necessary.

October:

• Verify any dual fuel unit can successfully switch between the two fuel sources

• Verify proper staffing as may be required during the extreme cold weather period

November:

- Initiate the plant procedures for extreme cold weather preparation. This includes heat-trace, windbreaks, heaters, shelters, etc.
- Initiate freeze protection checks when ambient conditions are expected to be below 40°F
- Check fuel oil systems on applicable units; test run the fuel systems
- Complete any incomplete work orders for extreme cold weatherization prior to December 1

December:

- Submit winter weatherization preparedness report to ERCOT on or before June 1
- Remain prepared to fire oil, at short notice, any time from mid-December to the second week in March.
- Continue use of freeze protection checks when ambient conditions are expected to be below 40°F.

January:

- · Continue to monitor equipment for extreme cold weather impact
- Continue use of freeze protection checks when ambient conditions are expected to be below 40°F.

February:

- Continue to monitor equipment for extreme cold weather impact
- Recheck all enclosure heaters and freeze protection systems when ambient conditions are expected to be below 40°F.

Oil Firing:

- Call in extra operations and maintenance personnel as needed.
- Set up fuel oil spill watch.
- Document the following as accurately as possible.
- Hourly generation:
 - On gas

On oil

• Fuel oil inventories, daily update by tank measurement.

Additional Cold Weather Measures (when and where applicable):

- Close outside doors and windows.
- Turn off all vent fans.
- Check all boiler and duct air heater enclosures for security.
- Check operation of all freeze protection systems.
- Set up additional space heaters as needed
- Notify instrument and electrical personnel of cold weather watch.
- Sample dew point of instrument air dryers every 6 hours.

- Check air lines for moisture.
- Alternate service water pumps every 4 hours.
- Circulate fuel oil in preparation of the run period

In addition to the above specific work orders and/or preventive maintenance activities may be utilized to support the preparation process. The above schedule is for typical Texas climate and changes may be required to accommodate rapid changes in weather conditions.

C. Water Shortages

- Jack County unit GT1, GT 2, and ST1: The units require water to be pumped from Lake Bridgeport. The water is used for the cooling towers and making demineralized water. If Lake Bridgeport level gets low, a floating pump platform is available (at the plant) to be deployed at Lake Bridgeport to support bringing water to the plant's holding pond. In the event Lake Bridgeport's level drops too low, Jack County units GT1, GT 2, and ST1 will be unavailable.
- Jack County unit GT3, GT4, and ST2: The units require water to be pumped from Lake Bridgeport. The water is used for the cooling towers and making demineralized water. If Lake Bridgeport level gets low, a floating pump platform is available (at the plant) to be deployed at Lake Bridgeport to support bringing water to the plant's holding pond. In the event Lake Bridgeport's level drops too low, Jack County units GT1, GT 2, and ST1 will be unavailable.

D. Weather Emergency Checklist

i) Cold Weather Emergency Checklist

Refer to the Jack County Winter Weather Readiness procedure attached as Appendix 1 to this EOP for various checklists to be completed by RW Miller plant staff during, and in preparation of, cold weather emergencies.

Item		Initials / Date/ Time
1,	Survey fuel oil inventory and	
	additives for applicable units	
2.	If a temperature If a	
	temperature ≥ 105 F is shown	
	on the DCS, initiate extreme	
	hot weather rounds every 4	
	hours.	

ii) Hot Weather Emergency Checklist

ANNEX 6

Restoration of Service

Jack County shall coordinate with ERCOT in the event of the need to restore generation that has been offline during an emergency. Current recovery priority of Jack County generators, subject to ERCOT instructions and then-existing circumstances at the time of recovery steps is as follows:

- 1. JACKCNTY_CC1
- 2. JACKCNTY2_CC1

APPENDIX 1

BRAZOS ELECTRIC	COOPERATIVE	PAGE:	1 of 18	REVISION NUMBER:	8
MANUAL:	JACK COUNTY ADMIN	IISTRATIVE PROCEI	DURES	REVISION DATE:	10/14/2022
DOCUMENT TITLE: WINTER WEATHER RI			EATHER READ	INESS	
DOCUMENT NUMBER:	100-002	DOCUMENT AUTHOR:	J. Morgan	REVIEW FREQUENCY:	Annually
APPROVED BY:	W. Walker	APPROVAL DATE:	10/14/2022	EFFECTIVE DATE:	10/14/2022

1.0 Purpose

- 1.1 The purpose of this procedure is to provide overall operating guidance in the execution of a winter weather readiness plan for the facility. The main focus is to maintain the highest degree of plant reliability and electrical grid stability during cold weather related events. All individuals involved in the operation and maintenance of the facility equipment, whether on shift or in a support role, shall be knowledgeable of the contents of this document.
- 1.2 This Winter Weather Readiness procedure refers to the management and execution of the required work activities to support winter weather readiness. For the purposes of winter weather readiness, a winter period is defined as November 1st through March 31st.

5.1	Safety	
5.2	Winter Weather Planning	
5.3	Operations Readiness	
5.4	Maintenance Readiness	
5.5	Reporting Derate and Forced Outage Events	10
5.6	Records	11

2.0 References

- 2.1 NERC Reliability Guideline: Generating Unit Winter Weather Readiness, located at <u>http://www.nerc.com/comm/OC/Pages/Reliability-Guidelines.aspx</u>
- 2.2 Winter Weather Readiness for Texas Generators
- 2.3 LCRA Winter Preparedness Process
- 2.4 BEPC Emergency Operations Plan
- 2.5 ERCOT Declaration of Completion of Generation Resource Weatherization Preparations (winter)
- 2.6 BEPC Weather Preparedness Program, Procedure Number 03-01-100-01

3.0 Definitions

3.1 Control Room Logbook - Narrative records maintained and used by plant personnel to describe and record all plant operating information/events. The Control Room Logbook is maintained in the Control Room in electronic format.

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- 3.2 Logs Forms used to record equipment-operating data. Data may be recorded using either hard copy (e.g. paper) or electronic data recorders.
- 3.3 Winter Period A period between November 1st and March 15th where extreme weather conditions are possible.

4.0 Summary of Roles and Responsibilities

4.1 Vice President – Generation

The Vice President - Generation is responsible for:

- Setting expectations for safety, reliability and operational performance during winter operating season
- Ensuring the development and enforcement of a site-specific winter weather readiness procedure at each generating facility
- Coordinating a fleet-wide annual winter preparation meeting, training exercise, or both to share best practices and lessons learned
- Encourage sharing of insights across company organizations and industry
- 4.2. Plant Manager

The Plant Manager is responsible for:

- Implementation and execution of this procedure as it applies to personnel under his/her direction and oversight of the winter weather readiness program to ensure the highest of plant reliability in regards to winter readiness
- Developing and maintaining a winter weather readiness procedure and appoint a designee responsible for keeping this procedure updated with site and industry identified best practices and lessons learned
- Conducting a plant readiness review prior to the winter season and any anticipated severe winter weather event
- Encouraging plant staff to look for areas at risk due to winter conditions and present
 opportunities to improve readiness and response
- Conducting an evaluation of the effectiveness of the winter weather preparation procedure and incorporate lessons learned after each winter season
- Submitting the annual Declaration of Completion of Generation Resource Weatherization Preparations (Winter) as required by Electric Reliability Council of Texas (ERCOT)
- 4.4 Facility Superintendents and Supervisors

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Facility Superintendents and Supervisors are responsible for:

- Monitoring and compliance in accordance with directives and scheduled actions as it pertains to this procedure
- Assuring completion of preventative (PM) and corrective (CM) maintenance and other actions required to achieve sustained reliability and availability by readying the plant for extreme weather events
- Communicating any deficiency that has the potential of impacting plant winter readiness to the Plant Manager
- Developing and maintaining winter weather readiness action plans and monitoring of scheduled maintenance activities that impact the winter readiness of the facility
- Review weather forecast daily during the winter period and communicate weather conditions that may potentially impact operational reliability to all employees
- Represent the facility by chairing or participating in winter weather readiness meetings with federal, state and other regulatory agencies, Brazos Electric Power Cooperative (BEPC) and generating facilities
- Maintaining all winter readiness and freeze protection records
- Prepare periodic winter weather preparedness reports as scheduled and forward to the Plant Manager
- Ensure all critical systems, equipment, instrumentation and other components have adequate freeze protection
- Review Computerized Maintenance Management System (CMMS) annually to ensure adequate preventative maintenance (PM) is scheduled on critical systems, equipment and components for maximum freeze protection and preparedness

4.5 Jack County Employees

All Jack County Employees are responsible for:

- Complying with the requirements of this procedure to ensure the facility is not impacted by winter weather events
- Identifying areas that pose a winter weather risk and properly notifying plant management of deficiencies that impact operational reliability
- Submit work orders in CMMS for any freeze related deficiency in a timely manner

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5.0 Procedure

5.1 Safety

- 5.1.1 Personnel and equipment safety shall remain a top priority during winter weather events.
- 5.1.2 Job safety briefings shall be conducted during preparation for and in response to winter weather events.
- 5.1.3 Employees shall be provided adequate personal protective equipment (PPE) while performing work activities during winter weather events, to include, but not limited to:
 - Slip-resistant shoes or shoe inserts
 - Winter gloves or glove inserts

5.2 Winter Weather Planning

- 5.2.1 All winter weather planning and preparation shall be completed by November 21st of every year. Any deviation from this requirement shall be reported to the Plant Manager with an action plan to resolve any outstanding winter related requirements.
- 5.2.2 By November 21st, the Winter Readiness Coordinator shall provide a winter weather preparedness summary to the Plant Manager.
- 5.2.3 Plant staff shall adhere to Exhibit A, Winter Readiness Planning Schedule, in an effort to ensure all winter preparations are complete by November 21st.
- 5.2.4 Plant staff shall constantly evaluate potential problem areas prone to severe weather by identifying and prioritizing systems, equipment, instrumentation and other areas of vulnerability which may experience freezing problems or other cold weather operational issues. This includes, but not limited to, equipment that has the potential to:
 - Initiate an automatic unit trip
 - Impact unit start-up
 - Initiate automatic unit runback schemes and/or cause partial outages

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- Cause damage to the unit
- Adversely affect environmental controls that could cause full or partial outages
- Adversely affect the delivery of fuel or water to the units
- Adversely affect the transportation and delivery of commodity and specialty chemicals and gases and consumable and inventory parts and components
- Cause other operational problems such as a slowed or impaired field devices
- Create a winter weather related safety hazard or condition
- 5.2.5 Based on previous cold weather events, a list (not all inclusive) of typical problems areas that have impacted operational reliability at Jack County are identified below. Plant staff shall review the plant and system design and configurations, identify areas with potential exposure to the elements, ambient temperatures, or both and develop a plan to address each accordingly.
 - Heat trace systems failed or not adequate
 - Wind breaks missing or not adequate
 - Insulation removed, damaged or not adequate
 - Instrument cabinet or enclosure heating elements failed or not adequate
 - Freeze protection support equipment not available
 - Pressure, level and flow transmitter and sensing lines not protected or inadequate
 - Instrument air system not properly draining and drying
 - Motor operated valves, positioners and solenoid valve froze
 - Small diameter water lines not adequately protected or drained
 - Gas turbine air inlet screen ice accumulation
- 5.2.6 To reduce the probability and consequences of failing to meet winter weather readiness, the following areas must be reviewed, implemented and/or maintained to ensure plan success:
 - Review winter weather forecast and develop necessary contingency plans when extreme weather is probable
 - Review plant and system cold weather design parameters and implement action plans as necessary for systems, equipment and components that are vulnerable to cold weather conditions
 - Ensure freeze protection equipment and supplies are procured, inventoried and available for the entire winter period

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- Ensure freeze protection equipment fuel supplies (i.e., kerosene, diesel, gasoline, etc) are full and inventoried regularly and orders made well in advance of need
- Ensure winter weather procedures, directives or standing orders are complied with and communicated to all employees
- 5.2.7 Training shall be conducted annually on this winter readiness procedure and BEPC's Weather Preparedness Program Procedure Number 03-01-100-01. Training shall include all sections of the procedure and may incorporate lessons learned, emergency response scenarios, and responses to freeze protection alarms, troubleshooting and repair of freeze protection circuitry, identification of plant areas most affected by winter conditions.
- 5.2.8 An internal Winter Readiness Planning meeting shall be scheduled by the Winter Readiness Coordinator no later than September 15th of each year. The purpose of this meeting will be to review winter readiness plans and actions to adequately prepare the facility for winter weather. At the discretion of the Winter Readiness Coordinator, subsequent planning meetings may be scheduled as needed. Attendees should include the plant manager, superintendents, supervisors and other key employees with direct involvement in winter readiness.
- 5.2.9 An external Facility Winter Readiness Review meeting shall be scheduled by the Winter Readiness Coordinator no later than November 21st of each year. Attendees should include senior management, plant management, Power Supply and Qualified Scheduling Entity (QSE) management. Topics of discussion should include:
 - Expected weather patterns through winter period, if available
 - Expected market conditions though the winter period, if available
 - Plant dispatching projections, if available
 - Review of outstanding winter readiness deficiencies
 - Review of lessons learned from previous winter periods
 - Review communication protocol for any freeze related event that causes a forced outage or de-rate
 - Determination of the facility's winter readiness condition
- 5.2.10 Bi-weekly conferences shall be held between Jack County, QSE and Power Supply staffs during the winter period to discuss winter readiness. Discussions shall include, but not limited to:
 - Plant status Discuss winter readiness, outstanding deficiencies, and need for additional staff coverage

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- Market conditions Discuss dispatch schedule, fuel supply needs and forecasted generation loads
- Weather forecast and conditions If severe weather is anticipated, discuss the severity, duration and timing
- 5.2.11 Immediately after a severe weather event, a meeting shall be convened by the Winter Readiness Coordinator to discuss issues, challenges and lessons learned. Meeting notes will be documented and maintained in a master log by the Winter Readiness Coordinator. Priority work orders will be issued and corrected for all outstanding deficiencies. Additionally, winter readiness procedures will be revised to reflect new information or actions.
- 5.2.12 The Operations and Maintenance Superintendents shall review the Computerized Maintenance Management System (CMMS) annually to ensure adequate preventative maintenance (PM) is scheduled on critical systems, equipment and components for maximum freeze protection and preparedness.
- 5.2.13 Administration Department shall inventory all freeze protection kits as provided in Exhibit C, Freeze Protection Inventory Checklist, and order replacement components by October 1st. Once inventoried and all items stocked, the freeze protection kits shall be labeled and sealed for emergency use only. Administration Department shall inspect each kit weekly during the winter period. Any kit found open shall be re-inventoried and re-stocked as soon as possible. Administration Department is responsible for proper staging of the freeze protection kits in designated areas by November 1st and placed back in storage by April 15th.
- 5.2.14 Department supervisors shall perform a Facility Winter Readiness Review by November 14th. The results of the Facility Winter Readiness review shall be forwarded to the Winter Readiness Coordinator. All deficiencies shall be addressed by November 21st. A Facility Winter Readiness Review Form is included in Exhibit E and will be completed for each of the following areas:
- Jack 1 CT1/HRSG1/Auxiliaries
- Jack 1 CT2 HRSG2/Auxiliaries
- Jack 1 ST1/Auxiliaries
- Jack 1 Cooling Tower
- Jack 1 Air Compressors/Air Dryers
- Jack 1 WTP
- Jack 2 CT3/HRSG3/Auxiliaries

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- Jack 2 CT4/HRSG4/Auxiliaries
- Jack 2 ST2/Auxiliaries
- Jack 2 Cooling Tower
- Jack 2 Air Compressors/Air Dryers
- Jack 2 WTP
- Jack 1 Aux Boiler and Closed Cooling
- Jack 2 Aux Boiler and Closed Cooling
- Jack 1/Jack 2 Gas Yard
- 5.2.15 The Winter Readiness Coordinator shall conduct a winter readiness evaluation and submit to the Plant Manager by November 21st. The evaluation shall include a verification that the facility is prepared for the winter period. A Winter Weather Readiness Evaluation is included in Exhibit F.
- 5.2.16 The Plant Manager shall submit a Declaration of Completion of Generation Resource Weatherization Preparations (Winter) as required by Electric Reliability Council of Texas (ERCOT) by November 30th.

5.3 Operations Readiness

- 5.3.1 The DCS is configured to alarm the operator that "Freeze Protection Required" at 40°F. This shall cue the Shift Supervisor/CRO to initiate winter weather readiness checks and observations.
- 5.3.2 Freeze protection checklists and observational checks, as identified in Exhibit B, Freeze Protection Checklist, shall be initiated under the following ambient conditions:
 - Below 50°F, observational checks shall be initiated once per shift on all Sodium Hydroxide (Caustic) systems and logged in the Water Plant logbook.
 - When ambient temperature reaches 40°F, the Shift Supervisor will direct that all Heat Trace panels be checked for proper operation. The initiation of these checks and the proper completion shall be logged in the electronic logbook.

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- At an ambient temperature of 35°F and falling, checklists shall be initiated once per shift with periodic observational checks performed on an as needed basis and at the discretion of the Shift Supervisor. Observation checks shall be logged in the electronic logbook.
- Below 28°F, checklists shall be initiated every 2 hours.
- DCS screens for transmitter box temperatures will be monitored constantly and completion of this will be logged hourly by the CRO when ambient temperature is 35°F or lower.
- 5.3.3 Completed Freeze Protection Checklists shall be retained through the entire winter period by Operations and forwarded to the Winter Readiness Coordinator at the end of the winter period, or as otherwise directed.
- 5.3.4 Graphical trends shall be displayed in the control room on overhead displays to identify developing trends on critical instrumentation when ambient conditions are below 35°F.
- 5.3.5 Ensure internet access is available in control room with weather and news channels for the most current weather forecast and conditions.
- 5.3.6 Ensure all temporary insulation covers are installed on critical valves, instruments and other components before November 21st.
- 5.3.7 During freezing weather conditions, maintain all fuel levels in portable freeze protection equipment (i.e., torpedo heaters).
- 5.3.8 Identify and submit work orders for freeze protection related issues using the correct priority codes based on risk evaluation immediately upon discovery.
- 5.3.9 Prior to any winter weather event, review the need for additional staffing coverage. Special staffing considerations shall be made when ambient conditions are below 30°F with high winds and freezing rain where ice accumulation is possible. For extended periods (>8 hours) below 20°F, the plant will staff:
 - A. An extra person to support and fill torpedo heaters,
 - B. Maintenance personnel (minimum 2 ICE Tech and 1 Mechanic) for night shifts,
 - C. Operations will staff a standby crew onsite (minimum 1 OP Tech, 1 CRO, and 1 WTP Tech) for operational support, and
 - D. In addition to the Shift Supervisor, a member of plant management of Supervisor level or higher will be onsite continuously during the event.

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- 5.3.10 Review weather forecast daily during the winter period and communicate weather conditions that may potentially impact operational reliability to all employees.
- 5.3.11 Verify that power block and water treatment plant compartment and building space heaters are operational (A reference list is provided in Exhibit B).

5.4 Maintenance Readiness

- 5.4.1 Review new CM work orders daily for freeze related issues and make every effort to correct the deficiency in a timely manner.
- 5.4.2 Perform PMs as scheduled in Exhibit D, Freeze Protection Preventative Maintenance.
- 5.4.3 Stage all temporary heat trace, portable heating equipment, wind breaks and canopies by November 21st if the plant outage schedule allows. If delayed by outage activities, these actions will be performed at the earliest opportunity. All temporary heat trace, portable heating equipment, wind breaks, and canopies will be removed by June 1st.

CAUTION

When staging portable heaters, ensure a risk assessment is conducted prior to set-up for the identification of potential fire hazards. Caution shall be taken when using flammable canopies near open-flame heaters.

- 5.4.4 Prior to any winter weather event, review the need for additional staffing coverage. Special staffing considerations shall be made when ambient conditions are below 30°F with high winds and freezing rain where ice accumulation is possible.
- 5.4.5 Develop and manage a list of all systems and components that require the use of temporary heat trace. An annual audit shall be conducted to ensure the list accurately reflects the heat trace currently required and in use.

5.5 Reporting Derate and Forced Outage Events

- 5.5.1 Any weather related event that causes a forced outage or de-rate of electrical output, QSE Resource Operator shall be notified and the appropriate entry made in the electronic logbook.
- 5.5.2 The Winter Readiness Coordinator, in direct coordination with site supervision, shall complete a Winter Weather Preparedness Lessons Learned form for any winter related event where other generating facilities can benefit and prevent reoccurrence. Completed Winter Weather Preparedness Lesson Learned forms shall be forwarded to the Plant Manager and QSE Resource Supervisor. A template is located in R:\Supervision Jack County\Procedures\Record Copy\100 Administration\Applicable Forms.

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5.5.3 Employees shall receive training on all approved Winter Weather Preparedness Lessons Learned.

5.6 Records

- 5.6.1 Any records generated as a result of this procedure shall be filed and retained for a period of not less than one (1) year. Records shall be made available for inspection by BEPC, state, federal or other regulatory agencies.
- 5.6.2 All winter readiness and freeze protection records shall be forwarded to the Winter Readiness Coordinator at the conclusion of the winter period. The Winter Readiness Coordinator is responsible for maintaining and storage of all winter readiness and freeze protection records.
- 5.6.3 The Winter Readiness Coordinator shall maintain a Lessons Learned Log with direct coordination and input from department supervisors for documenting notable winter readiness deficiencies and subsequent corrective action taken. The Lessons Learned Log shall include, at a minimum, the following:
 - A description of the deficiency
 - Cause of the deficiency and the impact to winter readiness
 - Action necessary or taken to resolve
 - Responsible department
 - Discovery date
 - Completion date

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Exhibit A Winter Readiness Planning Schedule

Action	Responsibility	Target Date	Comp. Date	TAB
Winter Readiness Planning Meeting (Internal)	SRC	9/15/22		1
Verification that Compartment Space Heaters are Operational	Operations	11/21/22		2
Freeze Protection Kit Inventory	Administration	10/1/22		3
Portable Gas Heater (Torpedo) Maintenance	Maintenance	10/15/22		4
Inventory Warehouse Freeze Protection Consumables	Administration	10/15/22		5
Inventory Winter Personal Protective Equipment	Administration	10/15/22		6
Inventory Fuel Supplies	Maintenance	Weekly		7
Employee Training on Winter Weather Readiness Procedure	Supervisors	11/ 1/22		8
Installation of Temporary Heat Trace	Maintenance	11/21/22		9
Thermography of Heat Trace Panels and Circuitry	Maintenance	11/21/22		10
Inspect Transmitter Box Heating Elements	Maintenance	11/21/22		11
Stage Freeze Protection Kits in Warehouse B	Administration	11/1/22		12
Installation of Valve and Component Insulating Covers	Operations	11/21/22		13
Survey Heat Trace Panels and Alarms	Maintenance	11/21/22		14
Facility Winter Readiness Review (Exhibit E)	Supervisors	11/21/22		15
All Winter Readiness Deficiencies Corrected	All	11/21/22		16
Installation of Temporary Wind Breaks and Canopies	Maintenance	11/21/22		17
Air Dryer Preventative Maintenance; check moisture traps for proper operation.	Maintenance	11/21/22		18
Winter Weather Readiness Evaluation (Exhibit F)	SRC	11/21/22		19
Facility Winter Readiness Meeting (External)	SRC	11/21/22		20
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Exhibit A Winter Readiness Planning Schedule (Continued)

Submit ERCOT Declaration of Completion of Generation Resource Weatherization Preparations (Winter)	Plant Manager	11/30/22	21
Inspect Freeze Protection Kits	Administration	Weekly	22
Conduct Freeze Protection Checks	Operations	< 40 F	23
Evaluate Additional Staffing Needs for Severe Weather	All	Per Event	24
Critical Instrument Review	Operations	11/21/22	25
System Readiness Review (Attachment 2.A)	Supervisors	6/30/22	26
Mechanical Design Criteria	Engineering	11/21/22	27
Post-Collect and Store Freeze Protection Kits	Administration	4/15/23	28
Post-Winter Season Meeting for 2022	Maintenance Superintendent	5/15/22	29
Removal of Temporary Freeze Protection	All	6/1/23	30

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Exhibit B Freeze Protection Checklists

Located at S:\Operations\Winter Weather Readiness. These checklists have been set up in the plant's GoPlant software for rounds.

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Exhibit C Freeze Protection Kit Inventory

Item #:	Quantity:	Description:			Box	Num	ber:	Note 1		
	Quantity.	pessiprion.	1	2	3	4	5	6	7	8
1	1	Heat Trace, 12 ft								
2	1	Heat Trace, 18 ft								
3	1	Heat Trace, 24 ft								
4	1	Duct Tape, 1 roll								·
5	2	Pipe Wrap Fiberglass Insulation, 3" x 25'								
6	1	50 ft Extension Cord								
7	1	25 ft Extension Cord								.:
8	1	Package Electrical Tie Straps								
9	1	Filament Tape, roll								
10	1	Canvas Tarp 10 x 12								
1 1	2	Pipe Foam Insulation, 1" x 6'								
12	1	Receptacle Box, 2 GFCI Outlets					•	•		
13	1	Torch Head for Propane Bottles					- ···	·· ··		
14	1	Torch Igniter for Propane Bottles						-		1
15	1	Heat Trace Application Tape, roll								
16	1	Heat Gun						•		

Note 1: Only 4 freeze protection kits are required

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	Exhib	bit D	
Freeze Prote	ection Prev	entative Mair	ntenance

Task	Equipment No.	Frequency	Responsible
Test All Torpedo Heaters	1EHHT0100	Annual	Maintenance
Survey All Heat Trace Panels and Circuits	1EHHT0100	Annual	Maintenance
Inventory Freeze Protection Kits	1EHHT0100	Annual	Administration
Install Temporary Wind Breaks and Canopies	1EHHT0100	Annual	Maintenance
Install Valve, Instrument and Component Covers	1EHHT0100	Annual	Operations
Perform Thermography of Heat Trace System and Circuitry	1EHHT0100	Annual	Maintenance
Inspect Transmitter Box Heating Elements	1EHHT0100	Annual	Maintenance
Perform Instrument Air Dryer Maintenance	1CADRY0100A 1CADRY0100B 2CADRY0100A 2CADRY0100A	Annual	Maintenance

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Exhibit E

Facility Winter Readiness Review

Area:	Date:	
_	-	
Evaluator:		

Areas evaluated shall be inspected by a department supervisor for the following items at a minimum:

- proper installation and operation of heat tracing
- insulation and lagging integrity
- signs of wet insulation under lagging
- water leaking from system piping or lagging
- verify all instrument sensing lines are adequately covered with insulation and heat tracing
- determine if temporary or permanent wind breaks and canopies are required to protect critical equipment or instrumentation from prevailing winds
- verify areas prone to freezing weather are adequately protected
- verify portable heaters and temporary heat trace is placed in areas prone to freezing

Evaluator shall consider the impacts to reliable plant operation should system piping, mechanical equipment and critical instrumentation be subjected to freezing weather conditions. Completed forms shall be forwarded to the Winter Readiness Coordinator.

#	Deficiency Description	Unit

Evaluator Signature: _____

Date: _____

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Exhibit F

Winter Weather Readiness Evaluation

Description	Date	Initials
Verify completion of Facility Winter Readiness Review by Supervisors		
Verify proper operation of the plant building heaters		
Verify Turbine Inlet Cooling and Chiller Systems are drained and in layup		
Verify instrument air dryers are operating properly and PM completed		
Verify heat trace systems are functional with no alarms		
Review thermography reports and ensure deficiencies are corrected		
Verify transmitter box heating elements are operational		
Verify freeze protection consumables are ordered and stocked in warehouse		
Verify freeze protection kits are stocked, sealed and staged		
Verify portable and permanent kerosene, diesel and gasoline tanks are full		
Verify portable heaters are operational and properly staged and safe		
Verify employee training has been performed on winter readiness		
Verify wind breaks, canopies and tarps are properly installed		
Confirm contractor availability for emergency response to any insulation needs		
Verify freeze protection logs are revised and reflect current operational checks		
Verify DCS trends are available		
Verify all winter readiness PMs are complete		
Review open work orders for any freeze protection deficiencies		
Verify proper operation of chemical tank heaters		
Verify adequate supply of winter personal protective equipment and supplies		
Review lessons learned log to ensure all previous lessons are incorporated		

The Winter Weather Readiness Evaluation shall be used to verify the completion of winter readiness tasks and certify the facility is prepared for winter operation. This evaluation shall be utilized to complete the ERCOT Declaration of Completion of Generation Resource Weatherization Preparations (Winter).

Winter Readiness Coordinator:

Plant Manager:

Date:

_____Date:

APPENDIX 2

Jack County Power

Site Specific Pandemic Preparedness and Response Plan

1. PURPOSE

This Pandemic Preparedness and Response Plan provides for the continuation of critical functions at the site in the event of a pandemic virus. It defines appropriate steps which the site may be required to take to safely manage site functions and personnel during any pandemic illness event that could disrupt staffing and critical functions. It provides for contingencies to avert or mitigate disasters and damage that may be caused by high levels of absenteeism and disruption of critical supply chains, and for quick recovery after the event.

2. SCOPE AND APPLICATION

This Pandemic Preparedness and Response Plan applies to Jack County Power and follows the requirements of the EthosEnergy O&M recommendations for action to be taken in the event of a Pandemic illness emergency and outlines the processes to follow to quickly recover to normal business operations.

It is intended to:

- Provide an orderly and efficient transition from normal to emergency conditions;
- Provide specific guidelines appropriate for complex and unpredictable occurrences;
- Provide consistency in action;
- Prevent activity inconsistent with the procedure;
- Establish a threshold at which an emergency response is triggered and defines who may authorize the response; and
- Provide guidance for returning to normal operations after the Pandemic crisis clears.

3. REFERENCES AND USEFUL LINKS

<u>Center for Disease Control (USA) Current Coronavirus Disease 2019 (COVID-19) Situation</u> <u>Summary</u>

OSHA Guidance on Preparing Workplaces for an Influenza Pandemic

Centers for Disease Control Travel Updates

World Health Organization Rolling Updates on COVID - 19

4. OBJECTIVES

This Plan is intended to provide for business continuity by:

- 1) Defining critical operations that must be continued, those operations that can be postponed for a period of time and those operations than can be postponed indefinitely;
- 2) Providing a planned transition from normal operations to emergency operations, maintaining only those functions defined as critical or vital operations;
- 3) Providing a level of security and safety for employees;
- 4) Providing standards for testing the Business Continuity for Pandemic Plan;
- 5) Ensuring continuation of services and ensuring reliability of the system;
- 6) Meeting regulatory requirements imposed by local, state, and federal regulatory agencies;
- 7) Managing successfully through a pandemic and reducing the disruption of services; and
- 8) Providing for rapid recovery of operations and services after a pandemic.

5. DETERMINING LEVEL OF HEALTH CRISIS

The World Health Organization included description of six Pandemic Alert Phases divided into three distinct periods in their 2019 – 2030 Global Influenza Strategy; although they specifically reference influenza pandemics, the strategy applies to the identification and control of pandemics caused by other viruses as well, including coronaviruses. The six pandemic alert phase are grouped into 3 periods: Interpandemic (low risk), Pandemic Alert (human cases reported), and the Pandemic Period (transmission to and between humans). For the purposes of this procedure, we shall introduce a fourth period: Recovery.

5.1 Phase Description

Interpandemic period

Phase 1: No new virus subtypes have been detected in humans.

Phase 2: No new virus subtypes have been detected in humans. However, a circulating animal virus subtype poses a substantial risk of human disease.

Pandemic Alert period

Phase 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.

Phase 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.

Phase 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

Phase 6: Pandemic: increased and sustained transmission in general population. A very crucial event in the emergence of a pandemic virus is the transition from phase 3 to phase 4, which may go much faster than previously supposed.

Recovery Period

This Period is in addition to the WHO Health Crisis Designations and refers to the after the Pandemic has abated (possibly after having gone through several cycles of severity), and businesses and sites are working towards returning to normal operations.

The designation of phases will be included in various locations throughout this plan to assist in determining appropriate responses throughout the cycle of a pandemic event. A pandemic event affects the entire world and assessment of such a global event will likely be determined by the WHO. Likewise, assessments in local or regional jurisdictions will occur as a pandemic event occurs.

6. DEFINITIONS IN THE SITE PLAN

This plan only considers the effect of a Pandemic Influenza on operations of Jack County Power and outlines the manner in which power production, if deemed critical and vital, will continue to be delivered throughout a pandemic event.

Critical parts and supplies are those parts and supplies that are necessary to maintain safe and efficient operation of the facility. These may include abatement chemicals (ammonia), water treatment chemicals, and replacement parts for critical equipment necessary to run generation or support equipment.

Critical services are those that parts and supplies that must be provided immediately to prevent injury, loss of life, or infrastructure destruction and loss of confidence in government. These services normally require resumption with 24 hours for the purposes of pandemic planning, they are the core services of the plant.

Site Pandemic Coordinator is the person at the site that the Facility Manager has designated to facilitate the development and coordination of the site Pandemic Preparedness and Response Plan. The Facility Manager will retain authority and responsibility for implementation of the Plan.

Vital services are those that must be provided within 72 hours without which loss of life or injury, infrastructure destruction, loss of confidence in government and disproportionate recovery costs would likely result. For the purposes of pandemic planning, these are vital and necessary services that may be performed on a rotating schedule.

7. CRITICAL ASSUMPTIONS IN DEVELOPING THE SITE PANDEMIC PLAN

When preparing this plan, the following assumptions were considered:

- 1) Once a pandemic virus reaches Phase 3 (in the Pandemic Alert Period) and has been introduced to humans, it may spread rapidly, leaving little or no time to prepare if it is capable of being spread by human to human contact because of high levels of global traffic and the contagiousness of the disease;
- 2) The pandemic will be widespread with simultaneous outbreaks (it may come in waves of severity;
- 3) There will be shortages of healthcare, emergency and essential services personnel due to illness and absenteeism;
- 4) There will be severe disruption in essential services;
- 5) There will be shortages of equipment and supplies; and
- 6) Peak absenteeism may reach as high as 40% (although some studies by the CDC do not expect it to exceed 20%) if the expected attack (or infection) rate is realized.

The possible impact of absenteeism of site employees and across industry as a whole should be included as a key element of the Plan because of impacts on personnel when family is affected, and the impact on the supply chain and operations; steps should be taken in advance and throughout the crisis to identify means to eliminate or reduce the impact of reduced staffing levels.

8. ELEMENTS OF THE SITE SPECIFIC PLAN

8.1 Identifying Site Pandemic Coordinator

The Facility Manager is designated as the Pandemic Coordinator for the site, unless noted otherwise. This employee will be responsible for maintaining this Plan, training site employees on the Plan, and implementing various levels of the Plan if a Global Health Crisis that may become a Pandemic is identified. This individual will coordinate as needed with the O&M Director of Health and Safety or other designated O&M Pandemic Coordinator and Safety on Plan development and implementation.

8.2 Identifying essential personnel and emergency succession

Site personnel identified in Attachment 1 have unique skills or duties and contingency personnel have been identified in the event that the primary cannot perform those duties. The Facility Manager or secondary Site Pandemic Coordinator shall work with any designees to ensure that appropriately trained and experienced contingency personnel are identified and prepared to assume responsibilities. When implementing the Pandemic Plan, employees who are wiling and able to remain on-site for extended periods during a Pandemic shall be identified and this should be noted on Attachment 1.

8.3 Identifying critical supplies and suppliers

Site Management shall work with their staff, including planners, to identify and document critical supplies and components that, if unable to obtain on short notice (throughout the duration of the pandemic or beyond) could cause a disruption in operations or could cause adverse impacts to health and safety and/or environmental compliance. These shall be documented on Attachment 2 or equivalent and shall be maintained with the Pandemic Plan by the Pandemic Coordinator.

8.4 Communication Plan

The Pandemic Coordinator shall develop a Communications plan that the site can implement in the event that a Global Health Crisis or Pandemic emerges. The Plan shall include how to get information and how to communicate information internally and across the O&M Organization, as well as who to call in the state or local government. Attachment 3 or equivalent documents the Communication Plan.

If a site employee is confirmed to have the virus and/or the virus reaches pandemic levels in areas that impact sites directly (local cases of the virus have been confirmed) or indirectly (in areas that may cause disruption of the supply chain for critical supplies and equipment), and the Pandemic affects or threatens to affect the site's ability to operate and perform its obligations under this O&M Agreement, the Facility Manager or acting Facility Manager shall notify the Regional Director and Legal department, who will then notify the customer within 48 of learning of such event of a potential Force Majeure. The notification shall state the nature of the event, its anticipated duration and any action being taken to avoid or minimize its effect.

8.5 Identifying applicable Non-Pharmaceutical Interventions (NPI) for the site

The Pandemic Coordinator shall work with Plant and Regional Management, Human Resources and O&M Safety personnel to develop NPIs that will help prevent spreading illness and the consequent disruption of operations at the site. These will include the supplies identified on Attachment 4 and shall include at a minimum:

- Providing adequate and readily available supplies of consumables needed to prevent disease transmission, including tissues, alcohol based hand sanitizer, and hand soap, as well as disposable gloves;
- Ensuring that hand washing facilities are available and adequate for the number of employees and contactors on site;

- Providing posters showing proper hand washing techniques in restrooms and employee break areas;
- Developing provisions for relaxing or extending sick leave policies to allow adequate time for employees to recover from any pandemic virus type symptoms away from work (HR will provide guidelines);
- Provisions for social distancing (keeping employees at least one yard/meter away from each other) such as elimination of group meetings, spacing workstations, conducting online meetings, telecommuting, etc.;
- Providing separate rooms or areas and providing facemasks for employees who show signs of illness but who may need to remain on site;
- o Reverse quarantining, or limiting access of non-essential personnel to the site;
- Stocking supplies of frozen and non-perishable food and water to enable sites to self isolate if needed for an extended period of time (one to two weeks minimum, based on circumstances); and
- Identifying and stocking bedding and toiletries for employees remaining on site for extended periods.

9. IDENTIFYING PLANT OPERATIONAL AND MAINTENANCE PROCEDURES

9.1 Accelerated Deferred Maintenance

Outages and other maintenance activities may need to be completed early or postponed due to limited availability of experienced employees and contractors, and due to lack of available parts and equipment. This site has done the following to prevent and minimize the impact of pandemic-related deferred maintenance:

- Completed all preventative maintenance in accordance with the CMMS system and schedule;
- Developed alternate plans for outage maintenance to include only critical work during the health crisis;
- Rescheduled outage work to occur sooner/later than originally planned;
- Identified sister plants with similar technology for potential equipment and labor sharing in the event of impending failures.

9.2 Slow/shut Down Procedures

The site has identified critical staffing levels that may determine reduced operating hours or full shut down, depending upon absenteeism during the Pandemic virus. These include:

• Level I Emergency (20% Absenteeism, 32 present & 8 off, for one (1) week):

THE SITE will continue to operate as per usual stands with the normal compliment of operators, maintenance staff and management and frozen and non-perishable food is stocked for employee use.

• Level II Emergency (30% Absenteeism, 28 present & 12 off, for one (1) week)

The Site will continue to operate with no less than four (4) operators per shift.

 Level III Emergency (40% Absenteeism or greater, 24 present & 16 off, for one to two weeks)

The Site will continue to operate with no less than four (4) operators per shift. Operators may be required to reside on-site for up to two weeks, or the duration of the pandemic.

The Site will make all attempts to continue to operate, however, in the event that the minimum required numbers of personnel are not available, THE SITE will make the decision to close down operations.

The Site will provide and maintain enough food, water, bedding, and supplies to maintain continuous habitation by up to 15 critical operations and maintenance and supplementary personnel for up to two weeks. See Attachment 5.

10. PHASED PLAN DEVELOPMENT AND ACTIVATION

This section defines actions to be taken at each Phase of the Pandemic Progression. The phases and actions are summarized in Table 1, below.

10.1 Interpandemic Phases

The site has identified a Pandemic Coordinator and maintain the site specific Plan so that it is available for update in the event that the World Health Organisation (WHO), the Centers for Disease Control (CDC) or other governmental health organization identifies a new virus that threatens to reach the Global Alert Period. The Plan shall be reviewed biennially when no Pandemic Alert is issued.

10.2 Global Health Crisis Advisory Phase

The EthosEnergy O&M Director of Health and Safety, or designee, will advise facilities when the World Health Organisation (WHO), the Centers for Disease Control (CDC) or other

governmental health organization identifies a new virus that threatens to reach the Global Alert Period.

When the Advisory is issued, several elements of this plan shall be initiated by the Site Pandemic Coordinator and other personnel as needed, including:

- The site Communication Plan.
- Identification of Critical personnel who have unique skills or duties and contingency personnel who may back fill for them (Attachment 1).
- Identification of critical supplies and components and the supply chains available to provide them.

10.3 Pandemic Alert, Phases 3 and 4

If and when the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 3 Health Crisis and the virus has begun spreading to humans, the site will begin to take measures to prevent transmission of the virus and to protect the continued safe operation of the site. The site will:

- Work with Human Resources to develop an interim sick leave policy that allows symptomatic employees (non-essential) to stay home until all symptoms are resolved.
- Develop work isolation plans to allow essential employees to continue working as needed.
- Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters if the supply chain is vulnerable.
- Identify employees who may be willing and able to remain on-site for up to two weeks if needed during a Pandemic crisis.

10.4 Pandemic Alert, Phase 5

The Facility Manager, in consultation with the Regional Director, shall have the authority to activate the Pandemic Plan (Phases 5 and 6) and shall have the authority to suspend the delivery of power production as required based on the resources available to deliver and to redeploy staff as necessary.

Once the plan has been activated, communications with staff (both at work and at home) must strive to address or assist with a wide range of concern, from questions regarding service delivery to assistance in providing information on health care and shelter-in-place suggestions.

If the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 5 Health Crisis and there are localized but large clusters of the virus identified, and/or if there are one or more confirmed case regionally, then the following additional steps will be taken.

- Implement travel bans or restrictions to countries and regions where pandemic virus cases have been identified.
- Implement Pandemic Fitness for Duty Policy (Attachment 5).
- Implement the interim sick leave policy that allows symptomatic employees (nonessential) to stay home until all symptoms are resolved.
- Develop work isolation plans to allow essential employees to continue working as needed.
- Develop hygiene plans that specify type area, and frequency of disinfectant cleaning at the site.
- Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters if the supply chain is vulnerable.

The EthosEnergy O&M VP of Health and Safety will communicate next steps to the sites, which may include travel restrictions, adjustments in sick leave policy, etc.. Communications materials including Posters, handouts, and other media may be provided across the organization at this time.

10.5 Pandemic, Phase 6:

If the Global Health Crisis reaches Pandemic Level 6, the site will implement the following as needed:

- Work related travel ban to all regions/areas where there are now clusters of Pandemic virus.
- Work isolation plan
- Disinfectant cleaning plan (see attachment 6)
- Extended habitation Plan (see list of supply requirements Attachment V).
- o Maintenance Deferment plan
- Site emergency shut down plan
- Post Pandemic Start up plan

10.6 Fitness for Duty Policy

A **Fitness for Duty Policy** (see Attachment 7) provides guidelines on how long employees who have demonstrated they are suffering the effects of influenza should stay away from work. This period of time will be established once the effects of the influenza are known. The policy shall also facilitate employees returning to work once they are well. Staff will be trained in respiratory etiquette and symptom recognition.

10.7 Travel Restrictions

To contain the spread of influenza, and to protect those employees who are well, travel restrictions shall be instituted. When Pandemic Phase 4 is reached in a local area, staff shall be restricted from traveling to meetings outside their place of work. Likewise, during Phase 4 or higher, travel for any reason shall be discontinued.

Table 1 – Summary of Appropriate Site Responses Based on the Level of Health Crisis

Pandemic Alert Phase(s)	Site Response
Interpandemic Period	 Continue Normal Operations Identify a Pandemic Coordinator Maintain the Site Specific PPRP Review and update every 2 years
Global Health Crisis Advisory (issued by the CDC/ WHO)	 Implement the Site Communications Plan Identify Critical Personnel and Contingency Personnel Identify Critical Parts, Supplies, and Services and coordinate with appropriate supply chains
Pandemic Alert Period Phases 3 and 4	 Coordinate with HR to implement an interim sick leave policy that allows symptomatic non Critical Employees to stay home until all symptoms are resolved. Develop work isolation plans to allow Critical Employees to continue working as needed. Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters. Identify employees who may be willing and able to remain on-site for up to two weeks if needed during a Pandemic crisis.
Pandemic Alert Period Phase 5	 Activate the Site Specific PPRP. Develop hygiene plans that specify type area, and frequency of disinfectant cleaning at the site Implement Pandemic Fitness for Duty Policy (Attachment 6) The Facility Manager, in consultation with the Regional Director, shall have the authority to suspend the delivery of power production as required based on the resources available to deliver and to redeploy staff as necessary.
Pandemic Alert Period Phase 6	 Implement a Work Isolation Plan Implement Disinfectant Cleaning Plan Implement an Extended Habitation Plan as appropriate Implement a Maintenance Deferment Plan as appropriate Implement a Site emergency Shut Down Plan as appropriate Review the Post Pandemic Start Up Plan

11. TESTING AND MAINTAINING THE BUSINESS CONTINUITY FOR PANDEMIC PLAN

Plan testing is essential to this business Continuity for Pandemic Plan. This plan shall be tested biennially and more often if needed, via a table top exercise, to determine if environmental changes or plan and policy changes affect this plan.

12. ATTACHMENTS

Attachment 1	Primary and Contingency Personnel
Attachment 2	Critical Supplies and Suppliers
Attachment 3	Pandemic Communication Plan
Attachment 4	Supplies and Provisions for Sustained Habitation at Site
Attachment 5:	Maintenance Planning and Resources
Attachment 6:	Pandemic Fitness for Duty Policy
Attachment 7:	Checklist for Pandemic Planning

Primary and Contingency Personnel

Instructions: Use this form or equivalent to identify critical personnel, skills and secondary personnel who have the requisite knowledge and experience to fill the primary individual's critical duties. If no-one is available to step up to perform critical duties, describe how the function will be performed in event of high absenteeism.

Job Title	Primary Employee	Able to Remain on site?	Secondary Employee	Able to Remain on site?	Essential skills	Comments
Facility Manager		Yes		Yes	Leadership and Management, administrative, planning.	
HSE Specialist		Yes		Yes	Environmental Reporting, Safety Leadership, Regulatory Knowledge	Corporate O&M HSE SPoC can provide additional support
ICE Tech		Yes		Yes	Instrumentation, Controls & Electrical Support	To be assigned during Pandemic Alert Phase 4 per section 10.3 of this procedure.
Shift Supr. (SS)		Yes		Yes	Facility Operations	To be assigned during Pandemic Alert Phase 4 per section 10.3 of this procedure.
Operators		Yes		Yes	Facility Operations	To be assigned during Pandemic Alert Phase 4 per section 10.3 of this procedure.

Use additional sheets as needed

Critical Supplies and Suppliers

Instructions: Use this form or equivalent to identify critical supplies and materials that the site must have for operational, safety, and environmental purposes. List current or primary suppliers, country of origin (if known), potential impact of disruption in supply, and contingency plan (extra supplies or parts on hand, etc.).

1. Description of material, part or equipment:		See a	See attached Critical Supplier List				
Supplier:					Contact information:		
Country of Or	Country of Origin:					Normal Lead Time:	
Back Up supplier name and information:					•	•	
Potential Impact of Supply disruption:							

Pandemic Communication Plan for Jack County Power

Global Health Crisis Advisory

The EthosEnergy O&M Director of Health and Safety, or designee, will advise facilities when the World Health Organisation (WHO), the Centers for Disease Control (CDC) or other governmental health organization identifies a new virus that threatens to reach the Global Alert Period.

Once the Advisory has been communicated, the Site Pandemic Coordinator shall notify site management of the Advisory and the possible need to implement the Pandemic Response Plan at the site in the near future.

Pandemic Alert, Phases 3 and 4

If and when the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 3 Health Crisis and the virus has begun spreading to humans, the EthosEnergy O&M Director of Health and Safety, or designee, will advise facilities and support functions (BERC, Human Resources, etc.) of the Alert and will begin sending out weekly communications to sites and support personnel to advise them of any updates and any required or recommended measures to prevent or mitigate impact of the virus, with more frequent calls as needed. She or he will also any immediate advisories and provide communication assistance, including access to informational materials for the sites.

When the Site Pandemic Coordinator receives the Pandemic Alert, they shall inform the Facility Manager of the Alert and the need to begin implementing site measures to prevent and/or mitigate impact in accordance with the Pandemic Preparedness and Response Plan. The site coordinator will also advise site personnel that the Pandemic Alert elements of the site Plan will be implemented.

Pandemic Alert, Phase 5

If the WHO, CDC, or other governmental health organization provides information that the virus has reached a Phase 5 Health Crisis and there are localized but large clusters of the virus identified, then the EthosEnergy O&M Director of Health and Safety will communicate next steps to the sites, which may include travel restrictions, adjustments in sick leave policy, etc. Communications materials including Posters, handouts, and other media may be provided across the organization at this time.

The Site Pandemic Coordinator shall notify all site personnel of the implementation of the Pandemic Response Plan, as well as next steps to take and watch for. He or she may post notices and posters or hold safety meetings, as needed. Employees will be notified that any illness with symptoms the same as or similar to the pandemic virus shall be reported.

The Facility Manager shall communicate to the Asset Manager that a Pandemic Alert is in place and advise them of the site Plan, next steps and the status of critical personnel and suppliers (Attachments 1 and 2) as applicable.

Any suspect or confirmed cases of the pandemic virus shall be immediately communicated by the Facility Manager or Pandemic Coordinator to Regional Management, Asset Manager, O&M VP HSE, O&M Management, as well as other site personnel. Local, State and Federal Health personnel shall be notified of all cases.

Pandemic, Phase 6:

If the Global Health Crisis reaches Pandemic Level 6, the site will communicate status of site personnel weekly or when any changes occur to the to Regional Management, the Asset Manager, the O&M HS Director, and O&M Management as applicable.

Insert names and contact information for:





Supplies and Provisions for Sustained Habitation at Site

The site anticipates having one extra full shift of operators (6), two IC&E Technicians, two Mechanics, and one Pandemic Coordinator/Alternate remain on site throughout critical absentee levels during a pandemic and will maintain the following for personnel remaining on site under Pandemic Conditions:

Bedding

- o One cot or mattress for each person remaining on site
- o One sleeping bag for each person
- o One pillow for each person
- o Designated room or rooms for sleeping

Water

The site will ensure that adequate dinking and sanitary water is available for each person to remain on site. Potable water tanks, eyewash and safety shower tanks, and other resources shall be kept full. In the event of disruption to the water supply, each site shall ensure that they have available at least one gallon of drinking water per day (14 gallons for 2 weeks) per person remaining on site. Additional water should be planned for cleaning and flushing.

Consumables

The site will provide essentials including toothbrushes, toothpaste, tissues, soap and other personal consumables for each person remaining on site.

Food

The site will provide food for up to 14 days for each person remaining on site; foods will be a combination of frozen and no-perishable and the site will provide sanitary facilities for the preparation and consumption of food items.

Upcoming Critical Maintenance and Major Maintenance Activities Scheduled

Description of Work / Probable impact of work not being done	Scheduled Dates	Name of Employee/Contractor to perform Work	Name of Alternate Person/Contractor to perform Work	Are Parts Available?	Can work be done sooner?	Can Work be Deferred?	
None Scheduled 2023							
Add Additional Sheets as Needed							

Pandemic Fitness for Duty Policy

The site is committed to providing a safe work environment in the event of a pandemic and to protect the health and safety of the staff. This policy and application applies specifically to a pandemic event.

1. PURPOSE

This policy provides a procedure for identifying and intervening when staff could pose a threat to the safety of others and property as a result of having contracted an influenza virus related to the pandemic.

2. **DEFINITIONS**

"Fit for Duty" means able to perform the duties of the job without creating a risk of other staff contracting the influenza virus.

"Health Services Provider" is a doctor of medicine or other health care practitioner who is qualified to provide a medical opinion on the state of health of a staff member as it relates to the influenza virus as expected in a pandemic event.

"OM or MM Manager" is the person to whom a staff member reports.

3. EMPLOYEE RESPONSIBILITIES

- 1) Reporting to work fit for duty;
- 2) Notifying the supervisor when not fit for duty;
- 3) Notifying the OM or MM, when observing a co-worker who may not be fit for duty, in cases where the possibility is such that the impaired individual is the OM or MM, the employee should make the notification to the Facility Manager.
- 4) Cooperating with a manager's directive and / or referral for a required medical evaluation.

4. OPERATIONS MANAGER or MAINTENANCE MANAGER'S RESPONSIBILITIES

- 1) Observing the attendance, performance and behaviour of staff they supervise.
- 2) Interviewing an employee who appears to the manager as unfit for duty and referring the affected employee for a medical evaluation when appropriate.

- 3) Recording the reasons / observations that triggered a fitness for duty medical evaluation referral.
- 4) Utilizing this policy in a fair and consistent manner, respecting the employee's privacy and the confidentiality of medical information.

5. PROCEDURE

- 1) If the Facility Manager receives reliable information that an employee may be unfit for duty, or through personal observation believes an employee to be unfit for duty, they will validate and document the information or observations as soon as is practical. Actions that may trigger the need to evaluate an employee's fitness for duty with respect to this policy are limited to observation of influenza conditions consistent with a pandemic event.
- 2) The Facility Manager will present the information or observations to the employee at the earliest possible time in order to validate them and will allow the employee to respond to the concern. The HSE Specialist will then determine whether the employee should leave the workplace immediately for safety and health reasons.
- 3) The HSE Specialist may direct the employee to a health services provider to assess the condition of the employee. An employee may not be allowed to return to work until such an assessment has been provided or until the HSE Specialist has been satisfied that the employee is fit to return to work based on the recommendations provided by a health services provider.
- 4) The employee shall be responsible for the cost of any medical evaluations completed by a health services provider, if required by the employer.
- 5) Prior to returning to work, after recovery from an influenza virus consistent with a pandemic event, the HSE Specialist shall consider advice received from the local health authorities on the length of time considered appropriate to recover from the influenza virus, and the length of time the virus remains infections.

Checklist for Pandemic Planning

Sites may use the Checklist linked below to cross check their Pandemic Preparedness and Response Plan and to determine if additional elements should be incorporated.

https://www.cdc.gov/flu/pandemic-resources/pdf/businesschecklist.pdf

APPENDIX 3

Jack County Power Station, LLC

NERC Standard: EOP-004-4 Revision: 0 Issue Date: 6-5-2023 Document Title: JCK-NERC-PGP-EOP-004-ATT-A – Event Reporting Operating Plan

NERC Policies, Guidelines, and Procedures (PGP) – EOP-004-Attachment A

Event Reporting Operating Plan

Revision History					
Version Date Section Reason for Issue					
0	5-30-2023	All	Initial Document for EOP-004 Event Reporting Operating plan		

Annual Review				
Date Initials Comments				
_				

Reviewed by:

Print Name

Reviewed and Approved by:

Asset Manager/Delegate

06/05/2023

Print Name

Date

Jack County Power Station, LLC

NERC Standard: EOP-004-4 Revision: 0 Issue Date: 6-5-2023 Document Title: JCK-NERC-PGP-EOP-004-ATT-A – Event Reporting Operating Plan

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Event Reporting Operating Plan

1.0 **RESPONSIBILITIES**

1.1 Plant Manager

- Verifies and monitors that the provisions within this procedure are followed in the operating environment.
- Reports events as identified in this procedure to the appropriate parties.
- Ensures that all employees are made aware of reportable events by phone, quick calls or through operating personnel.
- Maintains and approves this procedure.
- Establishes communication protocol with North American Electric Reliability Corporation (NERC), pertinent parties on the interconnection, and law enforcement.
- Ensures operating personnel receive training on this operating plan.

1.2 Operators and Maintenance Personnel

• Use sound judgment, take reasonable action, and provides complete and timely communications with the general manager and local law enforcement regarding the events listed in this document.

1.3 All Plant Personnel

• Maintain full awareness of this procedure, recognition reportable events and following the provisions when discovering suspicious activity.

2.0 SCOPE & APPLICABILITY OF EVENT REPORTING

There are situations worthy of reporting because they have the potential to impact reliability. Event reporting facilitates industry awareness, which allows potentially impacted parties to prepare for and possibly mitigate any associated reliability risk.

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It also provides the raw material, in the case of certain potential reliability threats, to see emerging patterns.

Examples of such events include:

- Bolts removed from transmission line structures.
- Train derailment adjacent to a Facility that either could have damaged a Facility directly or could indirectly damage a Facility (e.g. flammable or toxic cargo that could pose fire hazard or could cause evacuation of a control center)
- Destruction of Bulk Electric System (BES) equipment

Having an Operating Plan for reporting specific types of events provides the entity with a method to have its operating personnel recognize events that affect reliability and to be able to report them to appropriate parties, e.g., Regional Entities, applicable Reliability Coordinators (RCs), and law enforcement and other jurisdictional agencies when so recognized. In addition, these event reports are an input to the NERC Events Analysis Program. These other parties use this information to promote reliability, develop a culture of reliability excellence, provide industry collaboration and promote a learning organization.

3.0 **REPORTABLE EVENT TYPES**

3.1 Identifying Reportable Events

The following guidelines are to assist JCK personnel in the determination of events that should be reported per NERC Reliability Standard EOP-004-4. When an event occurs at JCK, personnel will take immediate action as deemed reasonable during any event based on the information available using the following guidelines:

- 1. The safety of the public, JCK and the JCK Plant Personnel are affirmed as the utmost priority.
- 2. For incidents that cannot be managed by JCK, law enforcement will be called immediately by control room personnel. Contact information for law enforcement can be found below.

Jack County	Power	Station,	LLC
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3. Notification will be made to the JCK Plant Manager as soon as suspicious activity, or an event occurs.

3.2 EOP-004-4/DOE-OE-417 Reportable Events

EOP-004-4 Requirement 2 will be met by filing the DOE OE-417 Form; all OE-417 reports must be filed within one hour, 6 hours or 24 hours as applicable. JCK will comply with the reporting criteria upon recognition of a threshold for reporting.

Submit Form OE-417 to the listed parties if one of the events listed below occurs:

DOE Form OE-417 Reportable Events						
Event Type	Threshold for Reporting Upon Recognition	Reporting Ree 24 ł	Primary Communication Responsibility			
(1) Physical attack	If causes major interruption or impact to critical infrastructure facilities or to operations.	<u>Emergency</u> <u>Alert:</u> 1 hour	0	Without substantial delay, notify the Control Room Operator (CRO). Without substantial delay, call the Plant	Local Law Enforcement DOE NERC	
(2) Cyber event	If causes interruptions of electrical system operations.	(DOE) 24 hours (Others)		Manager, Operations Manager. Call the Brazos Electric Power Cooperative (BEPC) Central Desk at	Texas RE (TRE) BEPC ERCOT	
(9) Physical attack or vandalism	A physical attack that could potentially impact electric system adequacy or reliability; or vandalism which targets components of any security systems.	Normal Report: 6 hours (DOE) 24 hours (Others)		Send a message to BEPC: sysop@brazoselectric.com Notify local law enforcement (911). Notify all onsite plant personnel at both plants	Local Law Enforcement DOE Texas RE BEPC ERCOT	

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DOE Form OE-417 Reportable Events						
Event Type	Threshold for Reporting Upon Recognition	Reporting Re 24 I	OPERATING PLAN Reporting Requirements and Actions (within 24 hours or less if noted)			
(10) Cyber event that could potentially impact electric power system adequacy or reliability	If the attempt occurred or was mitigated before causing an interruption or impact.		by radio. Submit EOP-004-2 Attachment 2 Event Reporting Form (or the current DOE-OE-417 form) to NERC. systemawareness@nerc. net or fax 404-446-9770 or Voice 404-446-9780			
(14) Damage or destruction of a Facility	Damage or destruction of a Facility that results from actual or suspected intentional human action.			Local Law		
(15) Physical threat to Facility	Physical threat to a Facility, excluding weather or natural disaster related threats that has the potential to degrade the normal operation of the Facility. OR Suspicious device or activity at a Facility.	System Report: Later of 24 hours or 1 business day		DOE NERC Texas RE BEPC ERCOT		

Note: Event numbering is in accordance with the DOE OE-417 form that pertain to a Generator Owner and Operator.

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<u>Form Location</u>: OE-417 and instructions for its completion are available from the Department of Energy Office of Electricity Delivery and Energy Reliability: <u>http://www.oe.netl.doe.gov/oe417.aspx</u>.

Where to File Report: The main recipient of Form OE-417 is the DOE:

- Online: https://www.oe.netl.doe.gov/OE417 /(Preferred)
- Fax: (202) 586-8485 (Second preference)
- Email: <u>doehqeoc@hq.doe.gov</u> (If online or fax is not available)
- Telephone: (202) 586-8100 (If online or fax is not available)

Additional Notifications: When Form OE-417 is submitted, other parties as listed above must be copied or informed of the event within 24 hours of recognition of the event as reportable by the recognition of meeting an event type threshold for reporting or by the end of the JCK's next business day (4 p.m. local time will be considered the end of the business day). Contact information is provided below.

Submit updates as needed and/or a final report (all of Schedules 1 and 2) within 72 hours of the incident.

The ERO Event Analysis Process has specific reporting requirements that fall outside of the scope of EOP-004-4. In the event that the Facility experiences one of the events listed above, the Facility shall review and categorize the event per the ERO Event Analysis Process and submit any required reports as outlined in the Event Analysis Process. Reportable events are as follows:

A loss of an entire generation station consisting of three or more generators (aggregate generation of 500 MW to 1,999 MW); combined cycle units are represented a one unit.

4.0 REPORTING EVENTS TO NERC

NERC has approved that the form OE-417 meets the submittal requirements for NERC. There may be other applicable regional, state and local reporting requirements.

The Plant Manager shall use DOE-417 Form for both DOE and NERC reporting. Submit reports to the ERO via one of the following:
Jack County Power Station, LLC

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CONTACT TYPE	Email/Fax/Phone
Email	<u>systemawareness@nerc.net</u>
Facsimile	404-446-9770
Voice	404-446-9780
E-ISAC	operations@EISAC.com

TABLE 1 – NERC Contact Information

5.0 <u>COMMUNICATION WITH LAW ENFORCEMENT AND OTHER PARTIES OF THE</u> INTERCONNECTION

Certain outages, such as those due to vandalism and terrorism, may not be reasonably preventable. These are the types of events that should be reported to law enforcement. Entities rely upon law enforcement agencies to respond to and investigate those events which have the potential to impact a wider area of the BES. The inclusion of reporting to law enforcement enables and supports reliability principles such as protection of BES from malicious physical attack. The importance of BES awareness of the threat around them is essential to the effective operation and planning to mitigate the potential risk to the BES.

Reporting an event to law enforcement agencies requires the Facility to notify the state or local level law enforcement agency. The state or local level law enforcement agency will coordinate with law enforcement with jurisdiction to investigate. If the state or local level law enforcement agency decides federal agency law enforcement should respond and investigate, the state or local level law enforcement agency will notify and coordinate with the FBI.

Contacting Law Enforcement

If it has been identified that one the event types listed above has occurred, the control room operator shall contact the Plant Manager, who will in turn contact State and Local Law Enforcement as soon as possible. If the Plant Manager is not available, the control room operator shall contact Local Law Enforcement.

Contacting other Parties of the interconnection

Jack County Power Station, LL	С
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If any of the events listed in above have occurred, the control room operator shall contact the Plant Manager, who will in turn contact TRE, JCK's Regional Reliability Organization, JCK's Reliability Coordinator (RC), Balancing Authority (BA), and Transmission Operator (TOP), using the contact information listed in Table 2 below.

TABLE 2 – PLANT MANAGER AND LAW ENFORCEMENT CONTACT
INFORMATION

Contact Name/Position	Phone Number/Email Address
Regional Entity -Texas RE	Phone: 512-583-4900
	<u>Email(s): rapa@texasre.org</u>
	Primary Phone: 512-248-3030 (Taylor)
	Secondary Phone: 512-874-5030 (Bastrop)
	Email(s): <u>shiftsupervisors@ercot.com</u>
ERCOT ISO (RC/BA)	
	Outage Coordinator
	Primary: 512-248-6841 (Taylor)
	Secondary: 512-874-5841 (Bastrop)
,	Primary Control Center (Waco-Badby)
	Primary Phone: 254-750-6260
	Secondary Phone: 254-752-1313
BEPC (TOP) Central Desk	Email: <u>sysop@brazoselectric.com</u>
	Backup Control Center (Whitney Admin)
	Primary Phone: 254-622-8239
	Secondary Phone: 254-622-8240
Law enforcement	911
FBI (Regional Offices)	210-225-6741 (SAN) SanAntonio@ic.fbi.gov
	972-559-5000 (DFW) fbi.dallas@ic.fbi.gov
	713-693-5000 (HOU) <u>Houston.Texas@ic.fbi.gov</u>
Dept. of Energy (for	https://www.ae.netl.doe.gov/OE417/Earm/Hame
submittal of OF-417 Form)	.aspx#
Required within 24 hours	(link to online form)
negarea main 2 mouis	

Jack County Power Station, LLC

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NERC	(for submittal	of
Event	Report Form)	

<u>systemawareness@nerc.net</u> Phone: 404-446-9780 Fax: 404-446-9770

6.0 U.S. DEPARTMENT OF ENERGY DISTURBANCE REPORTING REQUIREMENTS

The Electric Emergency Incident and Disturbance Report (Form OE-417) collects information on electric incidents and emergencies. The Department of Energy uses the information to fulfill its overall national security and other energy emergency management responsibilities, as well as for analytical purposes.

The OE-417 Electric Emergency Incident and Disturbance Report (OMB No. 1901-0288) has been updated and was recertified by the Office of Management and Budget in May 2018. The updated version of Form OE-417 incorporates additional questions from the NERC EOP-004 Event Reporting Standard.

For NERC reporting entities registered in the United States, NERC has approved that Form OE-417 meets the submittal requirements for NERC; however, please note that there may be other applicable regional, state, and local reporting requirements.

NOTICE: This report is mandatory under Public Law 93-275. Failure to comply may result in criminal fines, civil penalties and other sanctions as provided by law. For the sanctions and the provisions concerning the confidentiality of information submitted on this form, see General Information portion of the instructions. Title 18 USC 1001 makes it a criminal offense for any person knowingly and willingly to make to any Agency or Department of the United States any false, fictitious, or fraudulent statements as to any matter within its jurisdiction.

RESPONSE DUE: Within 1 hour of the incident, submit Schedule 1 and lines M - Q in Schedule 2 as an Emergency Alert report if criteria 1-8 are met. Within 6 hours of the incident, submit.

Schedule 1 and lines M - Q in Schedule 2 as a Normal Report if only criteria 9-12 are met. By the later of 24 hours after the recognition of the incident OR by the end of the next business day submit Schedule 1 & lines M - Q in Schedule 2 as a System Report if criteria 13-24 are met. Note: 4:00 pm local time will be considered the end of the business day. Submit updates as needed and/or a final report (all of Schedules 1 and 2) within 72 hours of the incident.

Jack County Power Station, LLC

NERC Standard: EOP-004-4 Revision: 0 Issue Date: 6-5-2023 Document Title: JCK-NERC-PGP-EOP-004-ATT-A – Event Reporting Operating Plan

METHODS OF FILING RESPONSE (Retain a completed copy of this form for your files.)

The Form OE-417 can be found at:

https://www.oe.netl.doe.gov/OE417/Form/Home.aspx.

Online: Submit form via online submission at: https://www.oe.netl.doe.gov/OE417/

FAX: FAX Form OE-417 to the following facsimile number: (202) 586-8485.

Alternate: If you are unable to submit online or by fax, forms may be e-mailed to <u>doehqeoc@hq.doe.gov</u> or call and report the information to the following telephone number: (202) 586-8100.

For additional instructions on completing the OE-417 report, see OE-417 ELECTRIC EMERGENCY INCIDENT AND DISTURBANCE REPORT Form Instructions.