

# **Filing Receipt**

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PROJECT NO. 53385

# RW MILLER 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 RW Miller Power, LLC ("RW Miller") on March 6, 2024.

RW Miller 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 RW Miller'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 RW Miller's facilities, RW Miller'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)(l)	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 RW Miller, 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 RW Miller, 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	9
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	17
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 the weather preparations required under §25.55 of this title	Annex 5	19
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(c)(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	24
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:

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

Name	Title	Access Date	Training Da	ate <sup>1</sup>
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<sup>&</sup>lt;sup>1</sup> Refers to training conducted for this plant under the substantially similar Brazos Electric Power Cooperative, Inc. EOP, which was adopted by RW Miller 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 New York § COUNTY OF New York §

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 RW Miller Power, LLC ("RW Miller"). 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 RW Miller;
- 2. Relevant RW Miller 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 RW Miller 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 RW Miller EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- 6. RW Miller maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- 7. RW Miller'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.

Nathan Hanson

SUBSCRIBED AND SWORN TO BEFORE ME by the said Nathan Hanson this (4) day of March, 2024.

Motary Public, State of New York



## 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 RW Miller. 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 RW Miller 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 Plant Manager. The RW Miller Energy Manager<sup>2</sup> 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 RW Miller Energy Manager's control ensure that only 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 RW Miller plant during emergency or adverse conditions shall be conducted in accordance with operational procedures of the ERCOT reliability region. RW Miller 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. RW Miller shall comply with the directives of ERCOT or other authorized entities, based on the next day assessments in the same manner in which RW Miller would comply during real time operating events.

<sup>&</sup>lt;sup>2</sup> "Energy Manager" refers to RW Miller'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. The Plant Manager will issue instructions to field personnel as needed to perform any necessary actions.

During system emergency operating conditions or emergency short supply conditions, the RW Miller 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, RW Miller 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.

RW Miller maintains additional procedures in other annexes of this EOP to address operating emergencies. Additional operating procedures for the RW Miller 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 RW Miller facilities would be developed and made available in the control room for the RW Miller Energy Manager.

## 2.4 Activation of EOP

The RW Miller 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 RW Miller 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.

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

## 5. EMERGENCY STAFFING PLAN

Emergency events may require special staffing needs depending on the specifies of the emergency. 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 RW Miller 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 RW Miller 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.

Refer to "Check List B" included in the RW Miller Winter Weather Preparedness Procedure (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 RW Miller's TSPs should this EOP be implemented by the Plant Manager:

Phone Com	munications Support

The individuals will be contacted in the order shown. Each individual will be responsible for his/her own transportation to the RW Miller power station. If necessary and possible, RW Miller 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 RW Miller 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 operator.

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 RW Miller 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

RW Miller 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.

RW Miller Cyber Security Posture:

- Comprehensive program: In addition to its corporate cyber security program, RW Miller 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.
- RW Miller SMEs participate in many working groups at the national and state level regarding cyber security.
- RW Miller monitors multiple sources to anticipate and identify new threats.

#### **B. LAYERS OF CYBER SECURITY**

RW Miller 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 RW MILLER'S RESPONSES

RW Miller implements the following best practices:

Recommendation	Homeland	NERC	Implemented by
	Security		RW Miller
Implement Application Whitelisting	Х		X
Implement Patch and Configuration Management	X		X

Manage Authentication	Х		Х
Monitor And Respond	Х		X
Reduce Your Attack Surface	Х		Х
Build Security Trust Rings	Х	X	Х
Implement Secure Remote Access	Х	X	Х
Develop secondary communication strategies		X	Х
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			Х
Use Next Generation Firewall Features to Block regions and applications			X

#### **D. ADDITIONAL PROTECTIONS**

RW Miller'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

RW Miller 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

RW Miller'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.

RW Miller 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 worm 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.

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

RW Miller 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.

RW Miller tests its alternative fuel supplies as part of its annual cold weather preparations prior to December 1. Annual testing of the fuel existing in tank and new fuel oil deliveries. The specific unit testing as to high sustainable limit (HSL) and ramping will be performed. Specific testing requirements will be maintained in the local plants' procedure(s).

The RW Miller 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 RW Miller 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.
- Cheek 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. Alternative Fuel and Storage Capacity

RW Miller has provided for a dependable source of alternative fuel at the RW Miller plant. Fuel oil capacity at the RW Miller Plant is approximately four million (4,000,000) gallons.

#### D. Water Shortages

- RW Miller units 2 & 3: These two units use demineralized water for boiler makeup. Units use lake water for once through cooling. In the event Lake Palo Pinto recedes away from the water intakes at the plant, the once through cooling will be lost due to the quantity for water required. The units will be taken off line (systematically) after the water is no longer available at the plant intakes.
- RW Miller units 4 & 5: These two units use demineralized water for the evaporative coolers and NOx control. In the event Lake Palo Pinto recedes away from the plant intakes, contacts with pipe and pump companies may take place to install a temporary pipeline and pump from the deeper section of the lake. The temporary system will pump water into the plant intakes at RW Miller allowing water to be available for making demineralized water.

#### E. Weather Emergency Checklists

#### i) Cold Weather Emergency Checklist

Refer to the RW Miller Winter Weather Preparedness 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.

#### ii) Hot Weather Emergency Checklist

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

### **ANNEX 6**

#### **Restoration of Service**

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

- 1. MIL\_MILLERG4
- 2. MIL\_MILLERG5
- 3. MIL\_MILLERG2
- 4. MIL\_MILLERG3

#### **APPENDIX 1**

BRAZOS ELEC	TRIC COOPERATIVE	DIVISION: (	01 - Generation	CATEGORY:		
ARFA / SYSTEM: ADMINISTRATIVE PROCEDURE			REVISION DATE:	12/19/2022		
DOCUMENT TITLE:	R. W. MILLER WINTER WEATHER PREPAREDNESS PROCEDURE					
DOCUMENT NUMBER:	ADM 0009 rev12	DOCUMENTAUTHOR:	AME	REVIEW FREQUENCY:	As Required	
APPROVED BY:		APPROVAL DATE:	3/17/2015	EFFECTIVE DATE:	3/17/2015	

#### DOCUMENT REVISION HISTORY

REV	REV DATE	DESRIPTION OF CHANGES / COMMENTS
10	DEC 2021	Added temp structure list
11	DEC 2022	Added emergency box inventory lists
12	DEC 2022	Updated when to restock supplies (gas, diesel, etc) and changed Ops round frequency and temperature.

#### Purpose

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.

#### 1.0 References

- **1.1** BEPC Emergency Operations Plan
  - 1.1.1 Section 7.0, Severe Weather Plans
  - 1.1.2 Section 7.1, General Actions for Severe Weather Events
  - 1.1.3 Section 7.3, Generation Facility Preparedness Actions
- **1.2** NERC Reliability Guidelines—Generating Unit Winter Weather Readiness—Current Industry Practices—Version 2

## 2.0 Power Plant Weatherization

2.1 March, (first week)

division Number:	01	CATEGORY:	01	AREA/ SYSTEM:	001
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**2.1.1** Survey fuel oil inventory and initiate purchasing procedures to increase inventory if desired.

## 2.2 April and May:

2.2.1 If Fuel oil is purchased, receive, test, and document oil deliveries.

### 2.3 September:

- 2.3.1 Survey all heating cable circuits for proper operation.
- 2.3.2 Survey outdoor control piping for missing insulation.
- 2.3.3 Survey plant for needed space heater, door and window repairs.
- **2.3.4** Survey plant building and grounds for needed enclosures and windbreaks.
- 2.3.5 Check dew point of instrument air dryers.
- 2.3.6 Prepare requisitions for needed materials and equipment.
- 2.3.7 Prepare work orders for needed work.

### 2.4 November,

- **2.4.1** Recheck all enclosure heaters and Critical Equipment freeze protection circuits.
- 2.4.2 Review all weather-related work orders for completion.
- 2.4.3 Circulate oil throughout system and light at least one burner.
- 2.4.4 Prepare work orders and immediately repair deficiencies.
- **2.4.5** Remain prepared to fire oil, at short notice, any time from mid-December to the second week in March.

#### 2.5 December, (first week):

**2.5.1** Recheck all enclosure heaters and Critical Equipment freeze protection circuits.

#### 2.6 January, (first week):

**2.6.1** Recheck all enclosure heaters and Critical Equipment freeze protection circuits.

#### 2.7 February, (first week):

**2.7.1** Recheck all enclosure heaters and Critical Equipment freeze protection circuits.

#### 2.8 March, (first week):

- **2.8.1** Recheck all enclosure heaters and Critical Equipment freeze protection circuits.
- 2.8.2 Fuel oil tank refill
- **2.8.3** Fuel analysis (CFPP and biocide additives)

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## 2.9 Oil Firing:

- **2.9.1** Schedule additional operations and maintenance personnel as needed.
- 2.9.2 Set up oil spill watch.
- 2.9.3 Document the following as accurately as possible.
  - a) Hourly generation:
    - On gas
    - On oil
- 2.9.4 Monitor the fuel oil tank levels on the DCS in the control room.

## 3.0 R.W. Miller Plant Procedure

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- **3.1** Plant management or supervisory personnel shall have the authority to initiate the R.W. Miller Plant Procedure listed below whenever, in their judgment, conditions warrant.
- **3.2** Fall preparations for cold weather shall include completion of the following check lists by October 31:
  - 3.2.1 "Operations Cold Weather Preparation Check List "A""
  - 3.2.2 "ICE Tech Cold Weather Preparation Check List "A""
  - 3.2.3 "Mechanic Tech Cold Weather Preparation Check List "A""
  - 3.2.4 "Water Tech Cold Weather Preparation Check List "A""
- 3.3 At 40 degrees Fahrenheit and falling:
  - **3.3.1** Operations shall check the Automated Freeze Protection systems to be in "Auto" and powered on, utilizing the "Automatic Freeze Protection Check List" once per shift. Additional observational checks may be performed on an as needed basis and at the discretion of the Shift Supervisor.
- 3.4 At 32 degrees Fahrenheit and falling:
  - **3.4.1** Operations shall check the Critical Equipment freeze protection systems twice per shift, utilizing the "Operations Cold Weather Rounds Sheet A". Additional observational checks may be performed on an as needed basis and at the discretion of the Shift Supervisor.

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- 3.5 At 20 degrees Fahrenheit and falling:
  - 3.5.1 Operations shall increase the frequency of rounds from twice per shift, to 6 times per shift utilizing the "Operations Cold Weather Rounds Sheet A".

# 3.6 With notification or knowledge of a forecast of freezing temperatures for 24 hours continuous or more:

- **3.6.1** The "ICE Tech Cold Weather Preparation Check List "B"" shall be completed.
- **3.6.2** The "Maintenance Cold Weather Preparation Check List "B"" shall be completed.
- **3.6.3** The "Water Tech Cold Weather Preparation Check List "B"" shall be completed.
- **3.6.4** The "Operations Cold Weather Preparation Check List B" shall be completed.

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## **R.W. Miller Plant Procedure Checkists:**

## **Operations Cold Weather Preparation Check List "A"**

Fall preparation for cold weather.

#### Initial / Date

Each Shift Supervisors is to Review & Procedure, the Cold Weather Checklis how, when, and where, to get the rea	Train their crew on the Cold Weather st and have all personnel fully understand adings.
Shift A	Shift B
Shift C	Shift D
Notify Lead Ops Tech if any new Rounds on Go Plant.	r checks need to be added to Cold Weather
Check with Maintenance Supervisor	to ensure:
De-Icing materials are on hand	
De-icing material located is	
De-icing Material Distributor loc	cation is
Perform Fuel Oil test on each unit wi	th fuel oil capability.
Unit 2 Tested	Unit 3 Tested
Unit 4 Tested	Unit 5 Tested
Fuel Oil Tank 2 Level is	
Fuel Oil Tank 4 Level is	
Hydrogen Bank Available Cylinders	

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#### Automatic Freeze Protection Check List

Ambient Temp <u>40°F</u>	4/4/2018	
Unit 1 & 2 Intake Freeze Protection Panel is in Auto.		
Unit 1 & 2 Intake Freeze Protection is Energized.		
Unit 3 Intake Freeze Protection Panel is in Auto.		
Unit 3 Intake Freeze Protection is Energized.		
Water Plant Freeze Protection Panel is in Auto.		
Water Plant Freeze Protection is Energized.		
Unit 1 Freeze Protection Panel is in Auto .		
Unit 1 Freeze Protection is Energized.		
Unit 2 Freeze Protection Panel is in Auto.		
Unit 2 Freeze Protection is Energized.		
Unit 3 Freeze Protection Panel is in Auto.		
Unit 3 Freeze Protection is Energized.		
Form Completed by:		

#### NOTE:

At 40 degrees Fahrenheit and falling: Operations shall check the Automated Freeze Protection systems to be in "Auto" and powered on, utilizing the "Automatic Freeze Protection Check List" once per shift. Additional observational checks may be performed on an as needed basis and at the discretion of the Shift Supervisor.

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## ICE TECH COLD WEATHER PREPARATION CHECK LIST "A"

#### Fall preparation for cold weather.

#### **DATE / Initials**

- \_\_\_\_1. Test and ensure proper operation of #1 & 2 Intake freeze protection circuits.
- \_\_\_\_\_2. Test and ensure proper operation of #3 Intake freeze protection circuits.
- \_\_\_\_\_3. Test and ensure proper operation of #1 Boiler freeze protection circuits.
- \_\_\_\_\_4. Test and ensure proper operation of #2 Boiler freeze protection circuits.
- \_\_\_\_\_5. Test and ensure proper operation of #3 Boiler freeze protection circuits.
- \_\_\_\_\_6. Test and ensure proper operation of #4 freeze protection circuits.
- \_\_\_\_\_7. Test and ensure proper operation of #5 freeze protection circuits.
- \_\_\_\_\_8. Test and ensure proper operation of Water Plant freeze protection circuits.
  - 9. Test all water plant heaters for proper operation.
- \_\_\_\_\_10. Test all polisher room heaters for proper operation.
- \_\_\_\_\_11. Test all large motor heaters for proper operation.
- \_\_\_\_\_12. Test Instrument Air Dew point. Verify calibration of the dew point instrument
  - \_\_\_\_\_13. Verify spare heat trace materials on hand.
  - \_\_\_\_\_14. Make recommended cold weather logic changes to combustion turbines

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## **MECHANIC TECH COLD WEATHER PREPARATION CHECK LIST "A"**

#### Fall preparation for cold weather.

#### DATE / Initials

- \_\_\_\_\_1. Take LO/TO and install plywood on roof exhaust fans without louvers.
  - 2. Test all pump room heaters for proper operation.
  - \_\_\_\_\_3. Service all torpedo heaters to ensure proper operation.
- \_\_\_\_\_4. Ensure there is an ample supply of roadway de-icer on site.(1 pallet/49 bags)
  - 5. Ensure there is an ample supply of Diesel anti-gel fluid on site.(10 gallons)
  - \_\_\_\_\_6. Check overhead and ground diesel tank levels, order if less than 50%.
  - \_\_\_\_7. Check ground gas tank level, order if less than 50%.
    - 8. Add Anti-gel fluid to overhead and ground diesel tanks.
  - \_\_\_\_\_9. Stage and fuel all supplemental heaters.
    - 10. Survey plant building and grounds for needed enclosures and wind-breaks utilizing "Appendix 1".
  - \_\_\_\_\_11. Check inventory of winter supplies, tools, and equipment. (See Appx 3)
    - 12. Walk down units looking for exposed areas that require insulation.
  - \_\_\_\_\_ a. RWM 1 boiler
- \_\_\_\_\_ b. RWM 2 boiler
- \_\_\_\_\_ c. RWM 3 boiler
- \_\_\_\_\_ d. RWM 1 & 2 intake
- \_\_\_\_\_ e. RWM 3 intake
- \_\_\_\_\_ f. RWM water plant
- \_\_\_\_\_ g. RWM 4
- \_\_\_\_\_\_ h. RWM 5

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## Water Tech Cold Weather Preparation Check List "A"

#### Fall preparation for cold weather.

Date / Initials:

\_\_\_\_\_1. Have anion and cation vessels regenerated and ready for service.

- 2. Have polishers backwashed, pre-coated, and ready for service.
- \_\_\_\_\_ b. RWM 2
- \_\_\_\_\_ c. RWM 3
  - 3. Have Dual Media Gravity Filters backwashed and ready for service
- \_\_\_\_\_ a. DMGF A1
- \_\_\_\_\_ b. DMGF A2
- \_\_\_\_\_ c. DMGF B1
- \_\_\_\_\_ d. DMGF B2
  - 4. Review chemical inventories of needed chemicals, Utilize "Appendix 2".

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Unit 1	<b>OPERATION COLD WEATHER CHECK LIST A PAG</b>	6E 1	DATE:	
	Ambient Temperature			
Feedwater Flow	Time			
Transmitter – 3rd level, Left	Temp			
side of boiler	Initials			
Drum Level N	Time			
level, Left side of	Temp			
boiler	Initials			
Drum Level S	Time			
3.5 level, Right	Temp			
side of boiler	Initials			
	Time			
Burner Front	Auto			_
Protection Panel	Energized			
	Initials			
1000-000	Time			
#1 Freeze Protection on	Auto			
the Burner front	Energized			
	Initials			
INTAKE				
Company of the	Time			
1 & 2 Intake	Auto			
Protection Panel	Energized			
	Initials			
	Time			
#3 Intake Freeze	Auto			
Protection Panel	Energized			
	Initials			
WATER PLANT				
	Time			
Water Plant	Auto			
Protection	Energized			
	Initials			

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Caustic Blanket Heater (keep above 59°)	Time			
	Temp			
	Initials			
UNIT 4				

#4 CT Freeze Protection Brk	Time				
	Brk Closed				
	Initials				

UNIT 4	<b>OPERATION COLD WEATHER CHECK LIST A PAGE TWO</b>	DATE:
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	Ambient Temperature				
#4 CT Turbine Enclosure (on Foxboro)	Time				
	Temp				
	Initials				

#### UNIT 5

#5 CT Freeze Protection Brk	Time				
	Brk Closed				
	Initals				
#5 CT Turbine Enclosure (on Foxboro)	Time				
	Temp				
	Initials				

#### **CIRCUIT LIGHTS**

#1 & 2 Intake- end of circuit	Time				
	Verified On				
lights (5)	Initals				
FW Flow Trans-	Time				
light #1 Boiler	Verified On				
3rd Ivl	Initals				
Drum IvI South	Time			_	
trans-End of circuit light #1	Verified On				
Boiler 3rd Ivl	Initals				
Brum Ivi North	Time				
Trains-End of circuit light #1 Boiler 2.5 lvi	Verified On				
	Initals				
Water Inj forwd	Time				
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Pump-End of	Verified On				
ണ്ടവപ്പെട്ടുപ്പും	Initals				
Water Plant	Time				
supply to U4 and U5 CSP circuit	Verified On				
light(U)	Initals				

32 degrees Fahrenheit and below: twice per shift 20 degrees Fahrenheit and below: 6 times per shift(every other hour)

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## ICE TECH COLD WEATHER PREPARATION CHECK LIST "B"

# With notification or knowledge of a forecast of temperatures below 20°F for 8 hours continuous or more.

## All items must be done even during times of outage

## Date/initials

- \_\_\_\_\_1. Verify all circuits identified on Critical Equipment heat trace list are operable
  - 2. Verify thermometers on all transmitter boxes are reading above 40 deg. F.
  - \_\_\_\_3. Verify dew point readings are at a minimum of 20 degrees lower than expected ambient temperatures
    - \_\_\_4. Ensure all pump room heaters are on and working properly.

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## **MECHANIC TECH COLD WEATHER PREPARATION CHECK LIST "B"**

With notification or knowledge of a forecast of temperatures below 20°F for 8 hours continuous or more.

All items must be done even during times of outage

## DATE / Initials

- \_\_\_\_\_1. Ensure adequate supplies of welding gasses are on site.
- 2. Check all portable carts for full bottles with heating tips installed.
- \_\_\_\_\_3. Stage all portable carts in pump room.
- \_\_\_\_\_4. Fill fuel barrels and cans for re-fueling heaters.
- \_\_\_\_\_5. Ensure all pump and polisher room louvers are closed.
- \_\_\_\_\_6. Ensure all gas cans are full.
- \_\_\_\_\_7. Park the forklift in the pump room bay.
- \_\_\_\_\_8. Park the tractor in the pump room bay.
- 9. Winterize combustion turbine inlet evaporative cooling system

## Water Tech Cold Weather Preparation Check List "B"

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# With notification or knowledge of a forecast of temperatures below 20°F for 8 hours continuous or more.

## DATE / INITIAL

- \_\_\_\_\_1. Lower neutralization sump level and manually open discharge valve.
  - \_\_\_\_\_2. Ensure water plant louvers are closed.
- 3. Ensure polisher room louvers are closed.
- \_\_\_\_\_4. Check Freeze protection panel in Auto and On.

## **Operations Cold Weather Preparation Check List B**

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# With notification or knowledge of a forecast of temperatures below 20°F for 8 hours continuous or more.

## DATE / INITIAL

- \_\_\_\_\_1. Cancel all non-essential maintenance work.
  - 2. Increase staffing levels.
  - A. Schedule 2 Crews per shift with available personnel.
  - B. Schedule member of management on alternate schedule.
    - C. Staff 1 or 2 ICE Tech depending on requirements and availability of technicians".
- D. Staff 1 or 2 Mechanic Techs, depending on requirements and availability of technicians".
  - 3. Fire RWM 2 boiler and heat soak turbine
- \_\_\_\_\_4. Fire RWM 3 boiler and heat soak turbine
- 5. Close all external doors and windows on building.
- \_\_\_\_6. Close all external doors on boilers
- \_\_\_\_\_7. Ensure all pump and polisher room heaters are working
  - 8. Check instrument air dew point, drain receiving tanks and inspect instrument air dryers for proper operation.
- \_\_\_\_\_9. Drain moisture from instrument air controllers and regulators.
- \_\_\_\_\_ 10. Start all supplemental heat sources.
- \_\_\_\_\_\_11. Initiate additional Operator Rounds for cold weather operation.
  - \_\_\_\_\_ 12. Check hydrogen levels for the generators

## DATE / INITIAL

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- \_\_\_14. Start a circulating water pump on each unit
  - A. #2
  - B. #3
  - 15. Start a service water pump on each unit
- \_\_\_\_\_ A. #1
- \_\_\_\_\_ B. #2
- \_\_\_\_\_ C. #3
  - 16. On line units and units starting up: place both FD Fans in service
  - \_\_\_\_\_ A. #2
  - \_\_\_\_\_ B. #3
    - 17. On idle units: drain chemical feed tanks, fill with water only and start pumps
      - A. #2
      - B. #3
    - 18. For units connected to the grid: prepare for gas curtailment
      - A. Check and record fuel oil tank levels
        - 1. #2 fuel oil tank
        - 2. #4 fuel oil tank
      - B. Circulate fuel oil through the mechanical package on the Combustion Turbines
        - 1. #4
        - 2. #5
      - C. Circulate fuel oil to burner fronts on steam units in service 1. #2
        - 2. #3
      - D. At a gas supply pressure of 500 psi and falling notify RO that more fuel gas is needed, or there will be a need to transfer to fuel oil, or drop unit load to control pressure.

## Appendix 1

DIVISION NUMBER:	01	CATEGORY:	01	AREA/ System:	001
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Temporary Freeze protection enclosures for R W Miller Plant (Twice per shift, check in GoPlant for operator rounds, except remote gas yards)

- 1. Unit 2 Sample panel
- 2. U2 BFP Pressure Switches
- 3. Unit 3 Sample Panel
- 4. U3 BFP Pressure Switches
- 5. U1 Aux XFMR Deluge system piping
- 6. U2 Aux XFMR Deluge System piping
- 7. U3 Aux XFMR Deluge System piping
- 8. U3 East Aux XFMR deluge System piping
- 9. #1 Gas Yard Control valves
- 10. Unit 4 & 5 Gas yard control valves
- 11. U2 "A" FD Fan actuator
- 12. U2 "B" FD Fan actuator
- 13. U3 "A" FD Fan actuator
- 14. U3 "B" FD Fan actuator
- 15. Fuel Tank 4 Forwarding Skid
- 16. U2 FW flow XMTR 4.5 level, North
- 17. U2 SH spray 5<sup>th</sup> level, North
- 18. U2 DA level controls Level 5, West
- 19. U3 DA level controls, Roof
- 20. U3 RH spray, 8<sup>th</sup> level, West
- 21. Gordon Gas Yard control valves
- 22. Huckabay Gas Yard control valves

## **Appendix 2**

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Date / Initial					On Hand	On Or	rder
	Połyr	ner Barre	ls 1 Mi	n.			
	Ferrie	c Tote	1 Mi	n.			
	Cl2 b	uckets	2 Mi	n.			
	Lime	Pallets	1 Mi	n.			
	Acid	Tank	45% Mi	n.			
	Caus	tic Tank	45% Mi	n.			
	TSP	Bags	2 Mir	٦.			
	Amin	e Barrei	2/3 Mii	٦.			
	Resir	n Buckets	21 Mir	ì.			

## Appendix 3

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Accomplish inventory weekly from Dec 1 through Mar 15. (Items will be reordered as required to maintain full kit inventory)

Unit 2 Area emergency kit:

6 FOOT HEATING CABLE	4
12 FOOT HEATING CABLE	4
18 FOOT HEATING CABLE	4
24 FOOT HEATING CABLE	4
TARP, 10' X 12'	1
12' X 20' TARP	2
HEAT GUN	2
STRAPPING TAPE	8 ROLLS
2' GFCI	3
TRIPLE FLINT LIGHTER	3
TORCH TIPS	4
50' YELLOW EXTENSION CORD	4
50' ORANGE EXTENSION CORD	4
100' ORANGE EXTENSION CORD	4
CANVAS TARP-GREEN	1
ZIP TIES (100)	1 PK

Unit 3 Area emergency kit:

6 FOOT HEATING CABLE	2
12 FOOT HEATING CABLE	2
18 FOOT HEATING CABLE	2
24 FOOT HEATING CABLE	2
PORTABLE ELECTRIC HEATER	2
TARP, 10' X 12'	3
HEAT GUN	2
STRAPPING TAPE	8 ROLLS
2' GFCI	4
TRIPLE FLINT LIGHTER	3
TORCH TIPS	2
50' YELLOW EXTENSION CORD	2
50' ORANGE EXTENSION CORD	3
100' ORANGE EXTENSION CORD	2
CANVAS TARP-GREEN	1
ZIP TIES (100)	1 PK

Appendix 3 Continued:

DIVISION NUMBER:	01	CATEGORY:	01	AREA/ System:	001
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## Unit 4 Area emergency kit:

6 FOOT HEATING CABLE 12 FOOT HEATING CABLE 18 FOOT HEATING CABLE 24 FOOT HEATING CABLE 24 FOOT HEATING CABLE PORTABLE ELECTRIC HEATER TARP, 10' X 12' HEAT GUN STRAPPING TAPE 2' GFCI TRIPLE FLINT LIGHTER TORCH TIPS 50' YELLOW EXTENSION CORD 50' ORANGE EXTENSION CORD 100' ORANGE EXTENSION CORD CANVAS TARP-GREEN ZIP TIES (100)	2 2 2 2 3 2 8 ROLLS 4 3 2 2 3 2 2 3 2 1 1 1 PK
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## Unit 5 Area emergency kit:

6 FOOT HEATING CABLE	2
12 FOOT HEATING CABLE	2
18 FOOT HEATING CABLE	2
24 FOOT HEATING CABLE	2
PORTABLE ELECTRIC HEATER	2
TARP, 10' X 12'	3
HEAT GUN	2
STRAPPING TAPE	8 ROLLS
2' GFCI	4
TRIPLE FLINT LIGHTER	3
TORCH TIPS	2
50' YELLOW EXTENSION CORD	2
50' ORANGE EXTENSION CORD	3
100' ORANGE EXTENSION CORD	2
CANVAS TARP-GREEN	1
ZIP TIES (100)	1 PK

**APPENDIX 2** 

# **RW Miller**

# 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 RW Miller 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 the RW Miller 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. Site Pandemic Coordinator/Facility Manager 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 sit 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; and
- 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, 29 present & 7 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.

o Level II Emergency (30% Absenteeism, 25 present & 11 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, 22 present & 14 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 for 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 12 (min) 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).
- 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	<ul> <li>Continue Normal Operations</li> <li>Identify a Pandemic Coordinator</li> <li>Maintain the Site Specific PPRP</li> <li>Review and update every 2 years</li> </ul>
Global Health Crisis Advisory (issued by the CDC/ WHO)	<ul> <li>Implement the Site Communications Plan</li> <li>Identify Critical Personnel and Contingency Personnel</li> <li>Identify Critical Parts, Supplies, and Services and coordinate with appropriate supply chains</li> </ul>
Pandemic Alert Period Phases 3 and 4	<ul> <li>Coordinate with HR to implement an interim sick leave policy that allows symptomatic non Critical Employees to stay home until all symptoms are resolved.</li> <li>Develop work isolation plans to allow Critical Employees to continue working as needed.</li> <li>Pre-order any critical supplies and equipment needed to safely operate the site within all compliance parameters.</li> <li>Identify employees who may be willing and able to remain on-site for up to two weeks if needed during a Pandemic crisis.</li> </ul>
Pandemic Alert Period Phase 5	<ul> <li>Activate the Site Specific PPRP.</li> <li>Develop hygiene plans that specify type area, and frequency of disinfectant cleaning at the site</li> <li>Implement Pandemic Fitness for Duty Policy (Attachment 6)</li> <li>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.</li> </ul>
Pandemic Alert Period Phase 6	<ul> <li>Implement a Work Isolation Plan</li> <li>Implement Disinfectant Cleaning Plan</li> <li>Implement an Extended Habitation Plan as appropriate</li> <li>Implement a Maintenance Deferment Plan as appropriate</li> <li>Implement a Site emergency Shut Down Plan as appropriate</li> <li>Review the Post Pandemic Start Up Plan</li> </ul>

## 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 4 per section 10.3.
Lead Operator		Yes		Yes	Facility Operations	To be assigned during Pandemic Alert 4 per section 10.3.
Mechanic		Yes		Yes	Mechanical Support	To be assigned during Pandemic Alert 4 per section 10.3.

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 Origin:				Normal Lead Time:			
Back Up supplier name and information:							
Potential Imp	Potential Impact of Supply disruption:						

## Pandemic Communication Plan for RW Miller

## **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 Manager or Pandemic Coordinator to Regional Management, the Asset Manager, O&M VP HSSE, 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 communicates status of site personnel weekly or when any changes occur to the to Regional Management, the Asset Manager, the O&M VP HSSE, 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 (4), three IC&E Technicians, one Mechanic, 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 non-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?	
No major maintenance planned in Fall, 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**

RW Miller Power Station, LLC  Revision: 0  3ssue Date: 6-5-2023  Document Title: RWM-NERC- DOD 001 ATT A Funct	DM/ Millor Power Station	NERC Standard: EOP-004-4		
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	Rw Willer Power Station, LLC	Document Title: RWM-NERC-		
PGP-BOP-004-ATT-A - EVent		PGP-EOP-004-ATT-A - Event		
Reporting Operating Plan		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	
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EOP-004-4 - Event Reporting

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## **RW Miller Power Station, LLC**

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

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# Event Reporting Operating Plan

## 1.0 <u>RESPONSIBILITIES</u>

## 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.
NERC Standard: EOP-004-4Revision:0Issue Date:6-5-2023Document Title:RWM-NERC-PGP-EOP-004-ATT-A – EventReporting Operating Plan

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 RWM personnel in the determination of events that should be reported per NERC Reliability Standard EOP-004-4. When an event occurs at RWM, 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, RWM and the RWM Plant Personnel are affirmed as the utmost priority.
- 2. For incidents that cannot be managed by RWM, law enforcement will be called immediately by control room personnel. Contact information for law enforcement can be found below.

 Notification will be made to the RWM 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. RWM 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	OPERATING PLAN Reporting Requirements and Actions (within 24 hours or less if noted)		Primary Communication Responsibility
(1) Physical attack	If causes major interruption or impact to critical infrastructure facilities or to operations.	Emergency Alert: 1 hour	<ul> <li>Without substantial delay, notify the Control Room Operator (CRO).</li> <li>Without substantial delay, call the Plant</li> </ul>	Local Law Enforcement DOE NERC
(2) Cyber event	If causes interruptions of electrical system operations.	(DOE) 24 hours (Others)	<ul> <li>Manager, Operations Manager.</li> <li>Call the Brazos Electric Power Cooperative (BEPC) Central Desk at</li> </ul>	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)	<ul> <li>254-750-6260</li> <li>Send a message to BEPC: sysop@brazoselectric.com</li> <li>Notify local law enforcement (911).</li> <li>Notify all onsite plant personnel at both plants</li> </ul>	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	OPERATING PLAN Reporting Requirements and Actions (within 24 hours or less if noted)		Primary Communication Responsibility
(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 <u>EOP-004-2</u> <u>Attachment 2 Event</u> <u>Reporting Form (or the</u> <u>current DOE-OE-417 form)</u> to NERC. <u>systemawareness@nerc.</u> <u>net</u> 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.

<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 RWM'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:

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

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

### **TABLE 1 – NERC Contact Information**

### 5.0 COMMUNICATION WITH LAW ENFORCEMENT AND OTHER PARTIES OF THE 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

RW	Miller	Power	Station,	LLC
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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, RWM's Regional Reliability Organization, RWM's Reliability Coordinator (RC), Balancing Authority (BA), and Transmission Operator (TOP), using the contact information listed in Table 2 below.

Contact Name/Position	Phone Number/Email Address
	Phone: 512-583-4900
Regional Entity -Texas RE	Email(s): rapa@texasre.org
	Primary Phone: 512-248-3030 (Taylor)
	Secondary Phone: 512-874-5030
	(Bastrop)
	Email(s): shiftsupervisors@ercot.com
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
	Email: sysop@brazoselectric.com
BEPC (TOP) Central Desk	
	Backup Control Center (Whitney
	Admin)
	Primary Phone: 254-622-8239
	Secondary Phone: 254-622-8240
Law enforcement	911
	210-225-6741 (SAN)
	SanAntonio@ic.fbi.gov
FBI (Regional Offices)	972-559-5000 (DFW)
Tor (Regional Onices)	fbi.dallas@ic.fbi.gov
	713-693-5000 (HOU)
	Houston.Texas@ic.fbi.gov

### TABLE 2 – PLANT MANAGER AND LAW ENFORCEMENT CONTACT INFORMATION

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

Dept. of Energy (for submittal of	https://www.oe.netl.doe.gov/OE417/For
OE-417 Form) Required within 24	m/Home.aspx#
hours	(link to online form)
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

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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.

**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: <u>https://www.oe.netl.doe.gov/OE417/</u>

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.