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**EMERGENCY OPERATIONS PLAN
(EOP)**

pursuant to

16 Texas Administrative Code § 25.53

I. EXECUTIVE SUMMARY

A. OVERVIEW

This Emergency Operations Plan (EOP), sometimes alternatively referred to herein as an Emergency Response Plan (ERP), sets forth the emergency operations/response plans and procedures of Roughneck Storage LLC ("KCE").

Section I of this EOP contains an executive summary that describes the contents and policies contained in the EOP, includes a reference to specific sections and page numbers of the EOP that correspond with the requirements of 16 TAC § 25.53, includes the record of distribution required under 16 TAC § 25.53(c)(4)(A), and contains the affidavit required under 16 TAC § 25.53(c)(4)(C).

Section II of this EOP sets forth KCE's emergency operations processes and policies applicable to those common operational functions that are relevant across emergency types. It contains subsections addressing the approval and implementation of the EOP, communications during emergency response, maintenance of pre-identified supplies for emergency response, staffing during emergency response, identification of weather-related hazards, and the process for activating the EOP.

Section III of this EOP contains annexes that outline KCE's response to specific types of emergencies—namely, weather emergencies of various types, water shortage, restoration of service, pandemic and epidemic, hurricane, cybersecurity, physical security, fire, toxic gas release, medical emergency, seismic event, hazardous material spill, workplace violence, and bomb threat.

Section IV of this EOP contains various appendices. Appendix 1 contains KCE's overall emergency response flowchart, Appendix 2 contains various checklists, Appendix 3 contains a bomb threat checklist, and Appendix 4 sets forth relevant site information.

I. EXECUTIVE SUMMARY (cont'd)

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I. EXECUTIVE SUMMARY (cont'd)

C. RECORD OF DISTRIBUTION

The following KCE personnel have received access to, and training on, the EOP on the following dates:

[illegible]

I. EXECUTIVE SUMMARY (cont'd)

D. AFFIDAVIT

I, Jeff Bishop, having been duly sworn, hereby state under penalty of perjury of the laws of Texas that:

1. I am the chief executive officer of, and the highest ranking person with binding authority over, KCE.
2. The relevant operating personnel of KCE 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 EOP has been reviewed and approved by the appropriate executives of KCE.
4. The drills required by 16 TAC § 25.53(f) have not yet been, but will be, conducted by KCE during the calendar year 2022. KCE will notify the Commission, pursuant to Commission rules, regarding that drill in due course.
5. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
6. KCE maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
7. KCE'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.

Each of the foregoing statements is true, and I would and could testify to the truthfulness of each statement under penalty of perjury in a court of law.

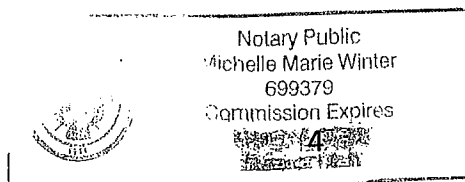
Signature: Jeff Bishop
Date: April 15, 2022

Subscribed and sworn before me on this 15 of April, 2022.

Michelle Marie Winter
Notary Public

Print Name: Michelle Marie Winter

My commission expires: 3/8/2023



I. EXECUTIVE SUMMARY (cont'd)

E. EMERGENCY CONTACTS

Name	Title	Contact Information	Can Immediately Address Urgent Requests and Questions from PUCT During an Emergency
Primary Contacts			
Erika Nelson	Director of Project Operations	518-565-6800	X
Joel Turkheimer	VP Market Operations	503-737-7893	X
Backup Contacts			
Harper Jones	O&M Manager	714-328-4961	X
Jim Vopelius	Director, HSEQ	281-222-8089	X

II. EMERGENCY OPERATIONS PLAN

A. APPROVAL AND IMPLEMENTATION

1. Introduction to EOP

The ERP details roles and responsibilities for coordinating emergency response activities before, during, and after any type of emergency or disaster.

The intent of the ERP is to coordinate emergency response efforts to save lives, reduce injuries, and maintain business continuity with its primary goal to assemble, mobilize and coordinate a team of responders and coordinators that can deal with any emergency.

This plan is implemented by the individual identifying an Emergency Condition either by dialing 9-1-1, or contacting the posted Emergency Contact Number.

2. Personnel with Responsibility for EOP

The following KCE personnel are responsible for maintaining and/or implementing the EOP, and/or have authority to change the EOP, as indicated:

Name	Title	Responsible for Maintaining EOP	Responsible for Implementing EOP	Authority to Change EOP
Jim Vopelius	Director, HSEQ	X		X
Erika Nelson	Director of Project Operations		X	
Harper Jones	O&M Manager		X	

3. Revision Control

Since the EOP's initial filing with the PUCT on April 18, 2022, the following revisions have been made to the EOP on the following dates:

Revision No.	Date Revised	Description of Revision

4. Currentness of EOP

KCE hereby affirms, as of April 15, 2022, that this EOP supersedes all previous EOPs. This EOP was most recently approved by KCE on April 15, 2022.

II. EMERGENCY OPERATIONS PLAN (cont'd)

B. COMMUNICATION PLAN

Key Capture Energy, LLC maintains a Crisis Communications Team which is responsible for maintaining and overseeing the implementation of KCE's plans and procedures for external communications during an emergency, including communications with the external parties listed below. Any incident that triggers the ERP shall be included in this scope.

1. Crisis Communication Team

The Crisis Communications Team has jurisdiction over any critical incident that has, or is reasonably likely to have, a negative effect on the health, safety or welfare of employees or the public. The team is activated if there is an incident on KCE-operated property, or directly involving KCE assets, that may have a material safety, health, environmental, security, economic, social or legal impact on KCE. The Crisis Communications Team will convene as promptly as possible following the occurrence of the relevant incident or event and shall continue to meet regularly as the incident and the response thereto develops.

2. Compliance with 16 TAC § 25.53

In compliance with 16 TAC § 25.53, specific members of the Core Crisis Communications Team will serve as the points of contact responsible for communicating with specific stakeholders. Each designated member under this sub-section 3 is responsible for reporting communications with their respective stakeholders back to the rest of the Core Crisis Communications Team.

Media. Messaging to the media is to be formulated by the Core Crisis Communications Team. In the immediate aftermath of an incident, Key Capture Energy, LLC's COO, or their designee, is permitted to issue statement(s) to the media briefly as required.

Public Utilities Commission of Texas. Key Capture Energy, LLC's General Counsel, or their designee, in consultation with the Core Crisis Communications Team, is responsible for communications with the PUCT.

Office of Public Utility Counsel. Key Capture Energy, LLC's General Counsel, or their designee, in consultation with the Core Crisis Communications Team, is responsible for all communications with OPUC.

Fuel Suppliers. N/A. KCE does not own or operate assets with fuel suppliers.

Local and State Government Entities, Officials, and Emergency Operations Centers. The on-site Emergency Response Coordinator ("ERC") is responsible for communications with local and state government entities, officials, and emergency operations centers. The ERC is directed to provide local and state officials and emergency operations centers with the information that is immediately required to respond to an ongoing incident. Long-term response (including in respect of any remediation and/or root cause analysis for an incident) shall be developed by the Core Crisis Communications Team and communicated through the ERC or another designated member of the Core Crisis Communications Team, as appropriate.

II. EMERGENCY OPERATIONS PLAN (cont'd)

Reliability Coordinator. Key Capture Energy, LLC's VP Market Operations is responsible for all communications with the applicable reliability coordinator. The VP Market Operations or, their designee, shall keep the applicable reliability coordinator apprised of any incident by telephone, as appropriate.

II. EMERGENCY OPERATIONS PLAN (cont'd)

C. MAINTENANCE OF PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

As BESS facilities are normally unmanned and, except as otherwise referenced herein, do not require the use of consumable supplies, no supplies are expected or necessary to support KCE response to emergencies detailed in this plan.

II. EMERGENCY OPERATIONS PLAN (cont'd)

D. STAFFING DURING EMERGENCY RESPONSE

As BESS facilities are normally unmanned, no on-site staffing is expected or necessary during emergency response. Except as may be specifically stated otherwise in this EOP, during an emergency the BESS will remain unmanned and, where applicable, personnel will be precluded from accessing the BESS unless / until determined safe for inspection / maintenance activities. In the case of a weather emergency impacting Key Capture Energy, LLC's Houston office, employees in Key Capture Energy, LLC's other offices around the country shall be knowledgeable in and prepared to support Texas operations.

II. EMERGENCY OPERATIONS PLAN (cont'd)

E. IDENTIFICATION OF WEATHER-RELATED HAZARDS

See Annex A (WEATHER EMERGENCIES) and Annex E (HURRICANE) for information regarding how KCE identifies weather-related hazards of various types.

II. EMERGENCY OPERATIONS PLAN (cont'd)

F. ACTIVATION OF EOP

In the event of an emergency, calling 911 is the preferred method for initiating emergency response.

As set forth in Appendix 4 – Site Information, the KCE emergency contact phone number is clearly marked on informational/warning signs around the perimeter fencing and may be dialed by any individual, whether an employee or a member of the public. This line is answered 24 hours a day 365 days per year by personnel instructed in how to initiate emergency response for the facility. The person receiving a call through the emergency contact number shall initiate this ERP by contacting the KCE Emergency Response Coordinator (ERC).

Responders will coordinate the plan and response according to all applicable laws and standards. Where a conflict exists between this plan and applicable laws and standards, the most conservative and restrictive shall be followed.

Response to emergencies, events or disasters shall only be undertaken to the level of the responders' training, Personal Protective Equipment (PPE), and resources available. No persons shall place themselves in harm's way to respond to an emergency.

Actual site conditions may be different than expected in this plan as there may be little to no warning during specific events to implement operational procedures.

The personnel identified below shall have the corresponding responsibilities described below in connection with activation of the EOP.

Operations & Maintenance Manager (or designee)

- initiate emergency response if not already initiated by the Remote Operations Center ROC by dialing 911 or calling local emergency response organizations directly as may be appropriate. Information to be provided to 911 operator or local emergency response organizations include:
 - location, type, and current status of incident
 - personnel injury (number, severity, status)
 - property damage (type, severity)
 - actions taken or in progress
 - any safety guidance to ensure safe arrival of response organizations
 - ERC contact information
 - contact information for on-scene coordinator, if any
- establish themselves as the ERC
- mobilize to site and assume additional responsibility of On-Scene Coordinator
- communicate with all parties during an emergency
- direct isolating facility from the grid when required
- direct isolating electrical equipment to the maximum extent possible
- monitor local news channels for critical information from the National Weather Service (NWS) including watches, warnings, and advisories for winter storms, tropical storms, and hurricanes issued by local NWS Forecast offices

II. EMERGENCY OPERATIONS PLAN (cont'd)

- responsible for implementing and ensuring personnel familiarity with this ERP

The Operations & Maintenance (O&M) Manager, or their designee acting as the ERC, shall be responsible for reporting the incident throughout KCE using the process included in the KCE HSE Manual. Specifically, the ERC shall initiate an e-mail via [REDACTED] for informing relevant operations and administrative contacts within KCE, to initiate corporate awareness and public communications activities in accordance with company structure and policies. The e-mail shall be formatted:

- *Subject: Initial Report – Location – Initial Classification – Date*
- *Body: Brief description of the event to include WHO, WHAT, WHEN, WHERE*

On Site Representative (employee; if onsite)

- If there are employees on-site, the senior-most of such on-site employees will act as the On-Scene Coordinator and shall assist in the implementation of this plan by:
 - call 911 – if not already done
 - evacuating all personnel and securing the scene
 - accounting for all personnel at muster area
 - assisting the evacuation of injured personnel if necessary
 - communicating with the ERC during the emergency
 - reporting the status of the facility to include evacuation of all onsite personnel
 - liaising with on-scene emergency responders
 - maintaining a written log and timeline of all response activities
 - directing all media inquiries to the Crisis Communications Team

NOTE: The On-Scene Coordinator, or the ERC when no KCE representative is onsite, will act as liaison to the Fire Department and any other first responders until the ERC arrives on-site.

All Onsite Personnel

- immediately report emergency situations to the senior KCE representative onsite
- call 911 to inform local emergency first responder personnel
- notify the ERC of the situation using the KCE emergency contact phone number posted onsite

NOTE: There shall be no delay to report emergency events that require local emergency responders. The senior KCE representative, if onsite, will call 911 and then immediately notify the ERC using the emergency contact phone number posted on-site.

III. ANNEXES

A. ANNEX A – WEATHER EMERGENCIES

1. Extreme Heat

BESS are normally unmanned facilities designed with dedicated climate control and therefore have minimal exposure to hazards associated with extreme heat. The KCE HSE Manual provides direction for personnel protection from extreme heat. KCE will deem there to be an extreme heat event when the temperatures are forecasted to go above the design limits of the BESS or upon notification of an extreme heat event by the ISO or other regulatory entity.

During an extreme heat event, the O&M Manager shall follow the following checklist for extreme heat emergency response:

- As per KCE's standard protocols, it will ensure personnel safety is a first priority at all times
- KCE will continue to monitor internal container temperatures to assure ongoing HVAC and other BESS operations
- As per KCE's standard protocols, it will notify the System Integrator (ROC) of the extreme weather event in order to have a heightened awareness and to continue to report any and all abnormal conditions to KCE including but not limited to:
 - enclosure interior temperatures
 - battery cell temperatures
 - ambient temperatures at the facility
- As per KCE's standard protocols, if problems are identified, it will react accordingly including, but not limited to the following actions:
 - Conduct remote troubleshoot when required
 - O&M Manager shall alert Director of Project Operations, VP Market Operations, CEO, COO, CFO, and General Counsel of any serious issues impacting operations or availability
 - Request KCE's service provider dispatch HVAC technicians or other service staff at earliest availability as required.

2. Winter Storm (Extreme Cold)

BESS are normally unmanned facilities designed with dedicated climate control and are therefore minimally susceptible to issues associated with extreme cold. The KCE HSE Manual provides direction for personnel protection from extreme cold. KCE will deem there to be an extreme cold event when the temperatures are forecasted to go below the design limits of the BESS or upon notification of an extreme cold event by the ISO or other regulatory entity.

When a winter weather threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the National Weather Service (NWS) including winter storm watches, warnings, and advisories issued by local NWS Forecast offices.

The O&M Manager shall follow all standard protocols at KCE including, but not limited to:

- plan accordingly with appropriate KCE-issued PPE for cold, wet conditions
- avoid on-site work and travel during inclement weather

III. ANNEXES (cont'd)

- assess the need and ensure adequate supplies which may include:
 - rock salt or similar product to melt ice on walkways
 - sand to improve traction
 - snow shovels
 - other snow removal equipment.

During an extreme winter weather event, the O&M Manager shall follow the following checklist for extreme winter weather emergency response:

- As per KCE's standard protocols, it will ensure personnel safety as a first priority at all times
- KCE will continue to monitor internal container temperatures to assure ongoing HVAC and other BESS operations
- As per KCE's standard protocols, it will notify the System Integrator (ROC) of the extreme winter weather event in order to have a heightened awareness and to continue to report any and all abnormal conditions to KCE including but not limited to:
 - enclosure interior temperatures
 - battery cell temperatures
 - ambient temperatures at the facility
- As per KCE's standard protocols, if problems are identified, it will react accordingly including, but not limited to the following actions:
 - conduct remote troubleshoot when required
 - O&M Manager shall alert Director of Project Operations, VP Market Operations, CEO, COO, CFO, and General Counsel of any serious issues impacting operations or availability
 - request KCE's service provider dispatch HVAC technicians or other service staff at earliest availability as required.
- check with DOT and/or local distribution utility to understand site access concerns during a winter storm

3. Hurricane

See Annex E (HURRICANE) below.

4. Tornado

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with tornadoes.

When a tornado threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices.

If personnel are onsite, if the potential for a tornado exists and prior to sustained winds >25 miles per hour, material shall be secured and aerial work stopped upon the issuance of a tornado warning, the facility shall evacuate and have all personnel report to the nearest shelter area, to be determined prior

III. ANNEXES (cont'd)

by O&M personnel during daily safety briefs. In the event O&M personnel are outside and unable to evacuate to the shelter, the following guidance is provided to personnel onsite:

- lie flat in a nearby ditch or depression, covering the head with the hands, being aware of the potential for flooding
- find shelter in a low, flat location
- avoid sheltering under an overpass or bridge
- do not try to outrun a tornado in congested areas in a vehicle
- leave vehicle to find safe shelter
- beware of flying debris.

Following tornado or high wind events, the facility will be evaluated by the O&M personnel for damage. All repairs will be performed under standard operational procedures.

5. Flooding and Flash Flood

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with flooding.

When a flooding threat exists, the facility's O&M Manager shall monitor local news channels for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices.

Flash flooding is a result of heavy localized rainfall such as that from slow moving, intense thunderstorms. Flash floods often result from small creeks and streams overflowing during heavy rainfall. These floods often become raging torrents of water which rip through riverbeds or canyons, sweeping everything with them. Flash flooding can occur within 30-minutes to six hours of a heavy rain event. In hilly terrain, flash floods can strike with little or no advance warning. Distant rain may be channeled into gullies and ravines causing flash flooding in minutes. In the event of a flash flood, the following guidance is provided to personnel onsite:

NOTE: It does not have to be raining for flash flooding to occur.

- do not drive through flooded areas, even if it looks shallow enough to cross
- person leading work shall make a judgement to either shelter in place, or immediately secure the work and travel to safe refuge
- do not cross flowing streams on foot where water is above your ankles.
- be especially cautious at night as it is harder to recognize water danger then.
- do not attempt to outrun a flood on foot
- if flooding is seen or heard, move to higher ground immediately
- be familiar with nearby land features where you work
- wait 15 to 30 minutes, or until high water recedes, prior to leaving shelter

III. ANNEXES (cont'd)

6. Lightning Storms

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to personnel hazards associated with lightning.

If personnel are onsite and a lightning storm is within 10 – 30 miles and approaching the site, the following guidance is provided:

- notify facility's O&M Manager and all on-site employees
- stop work safely and head to company or personal vehicles
- if storm/lightning is still approaching the site, get in and stay in vehicles that have rubber tires only
- once storm passes, remain in vehicle for at least 30 minutes depending on passing storm severity, and wait for an "OK" from the O&M Manager in charge of monitoring the storm

7. Market Operations Responsibilities

In the case of any inclement weather, the Market Operations Team shall:

- monitor all communications from Independent System Operators (ISOs) including, but not limited to Operating Condition Notices (OCN), Advisories, and other communications.
- ensure site operations are aware of all ISO notices regarding impending winter weather
- communicate with ERC regarding any such communications
- ensure KCE representative is on-call 24/7 to receive and respond to notices and to communicate internally (including ERC) and with site operator / ROC during periods when ISOs have issued a weather notice
- ensure local Transmission Distribution Service Provider (TDSP) has KCE/ROC contact info heading into any period when ISO has issued a weather notice

III. ANNEXES (cont'd)

B. ANNEX B – WATER SHORTAGE

BESS are normally unmanned facilities that do not require water or access to a water source and are unaffected by water shortages.

III. ANNEXES (cont'd)

C. ANNEX C – RESTORATION OF SERVICE

Once emergency response is complete and locations are determined to be safe for personnel access, where required, COO and Director of Project Operations shall determine whether restoration of service is safe and appropriate, in coordination with the ROC. Restoration of service shall be performed in coordination with the applicable Qualified Scheduling Entity and with the appropriate approvals (if required) from ERCOT.

III. ANNEXES (cont'd)

D. ANNEX D – PANDEMIC AND EPIDEMIC

BESS are normally unmanned facilities therefore have limited exposure to personnel hazards associated with outbreaks and pandemics. Guidance associated with pandemic response shall be included in the KCE Safety Manual or provided as a standalone pandemic guideline. KCE is able to operate under work-from-home conditions if required due to a pandemic or epidemic.

III. ANNEXES (cont'd)

E. ANNEX E – HURRICANE

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with hurricanes.

When a hurricane threat exists, regardless of Category, the facility's O&M Manager shall monitor media outlets for critical information from the NWS including watches, warnings, and advisories issued by local NWS Forecast offices and shall be cognizant that conditions can change rapidly.

Evacuation and re-entry planning for assets located in Hurricane Evacuation Zones shall follow the guidance provided by local authorities.

The following are the general guidelines for hurricane conditions.

CONDITION 4

- hurricane within 72-hours of arrival, and possible movement towards facility
- brief all personnel
- avoid on-site work and travel
- start clean-up and securing operations, if required
- plan for next condition

CONDITION 3

- hurricane within 48-hours of arrival
- intensify clean-up and securing operations, if required
- evaluate starting some Condition 2 activity

CONDITION 2

- hurricane within 24-hours of arrival
- complete all clean-up and securing operations, if required

CONDITION 1

- hurricane within 12-hours of arrival
- shutdown all on site activities, if any
- complete all items above
- ensure complete evacuation of facility if any personnel onsite
- ensure ROC monitoring until hurricane passes

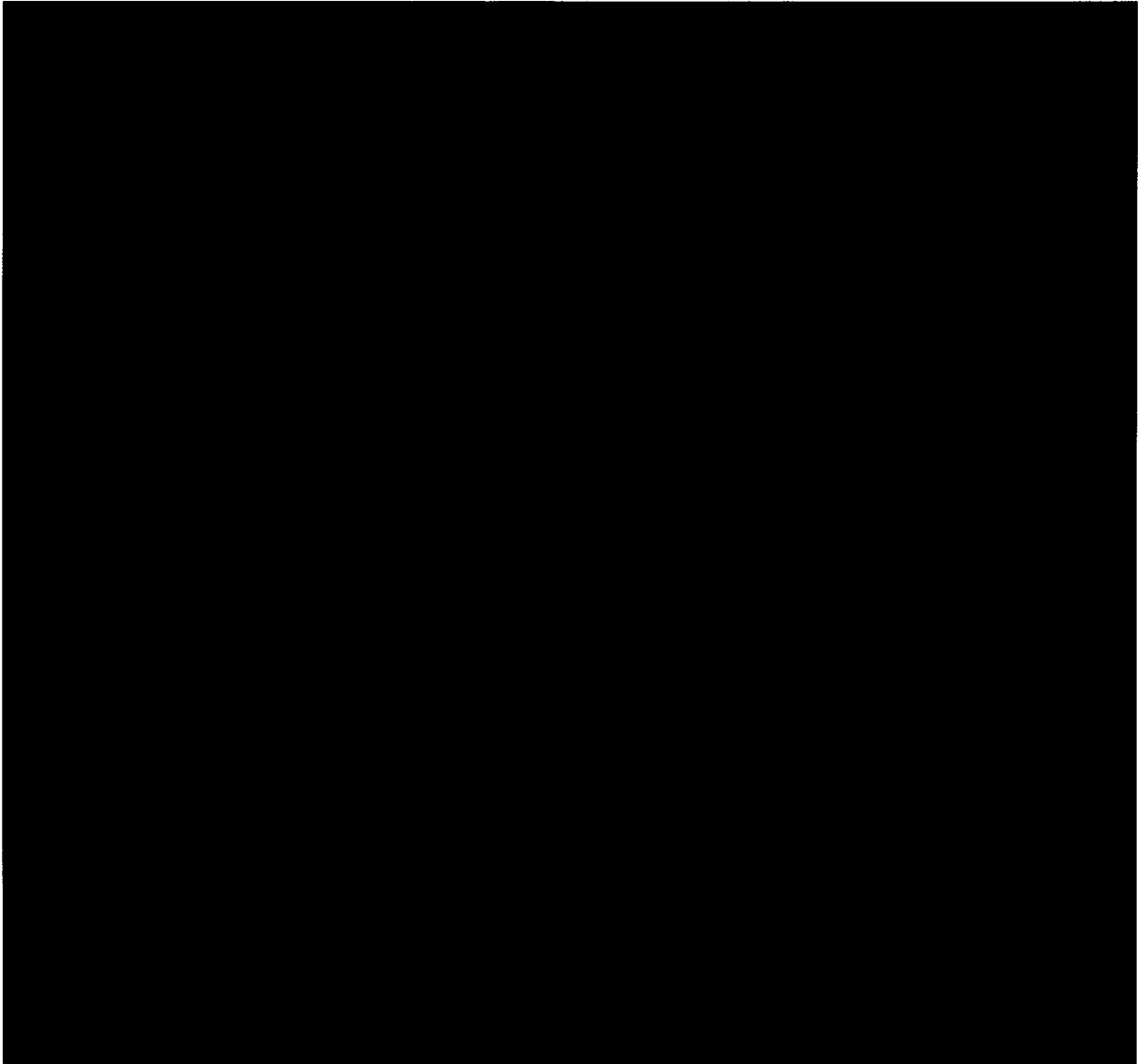
POST HURRICANE

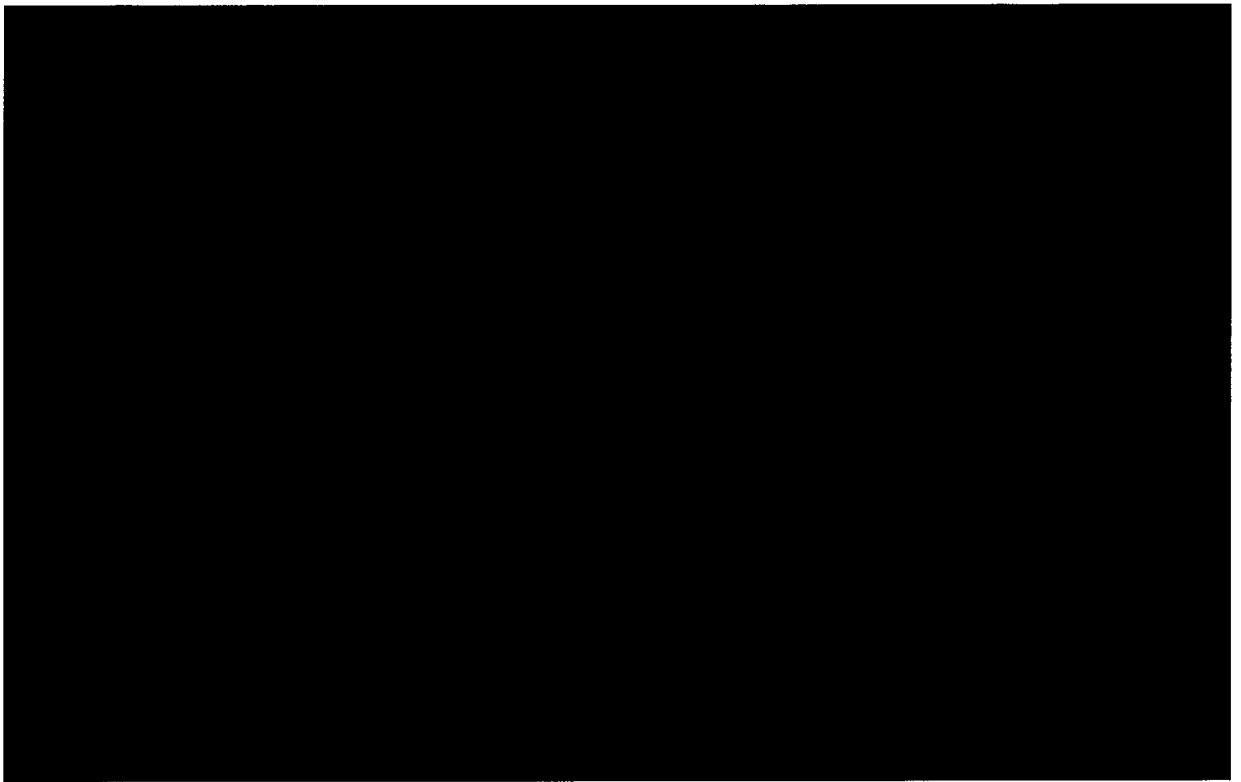
- once practical to visit site, a walkdown shall be conducted starting with a perimeter walk outside the fence, re-entering inside the fence after visually confirming conditions are safe to continue
- take pictures from all sides of the facility for documentation

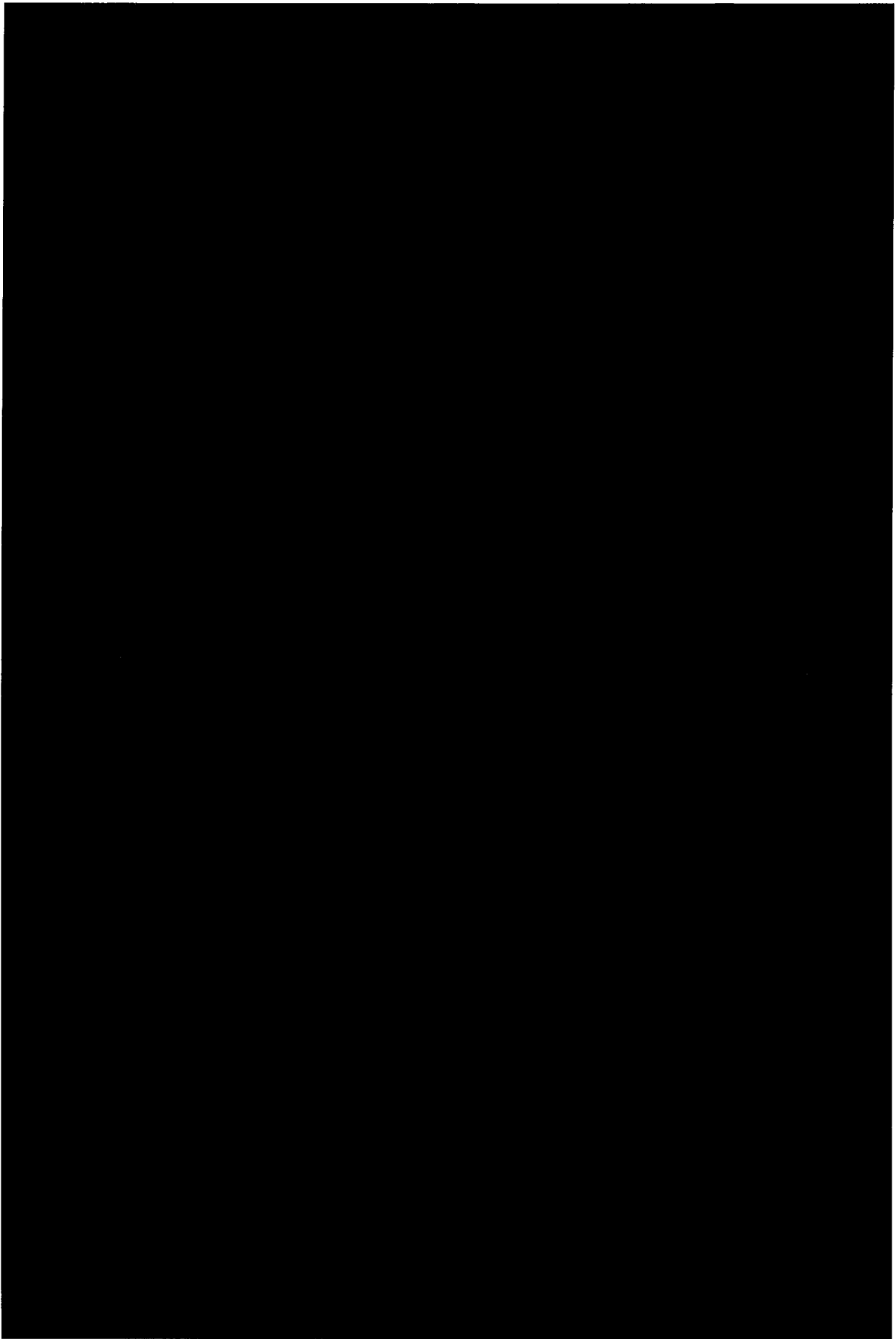
III. ANNEXES (cont'd)

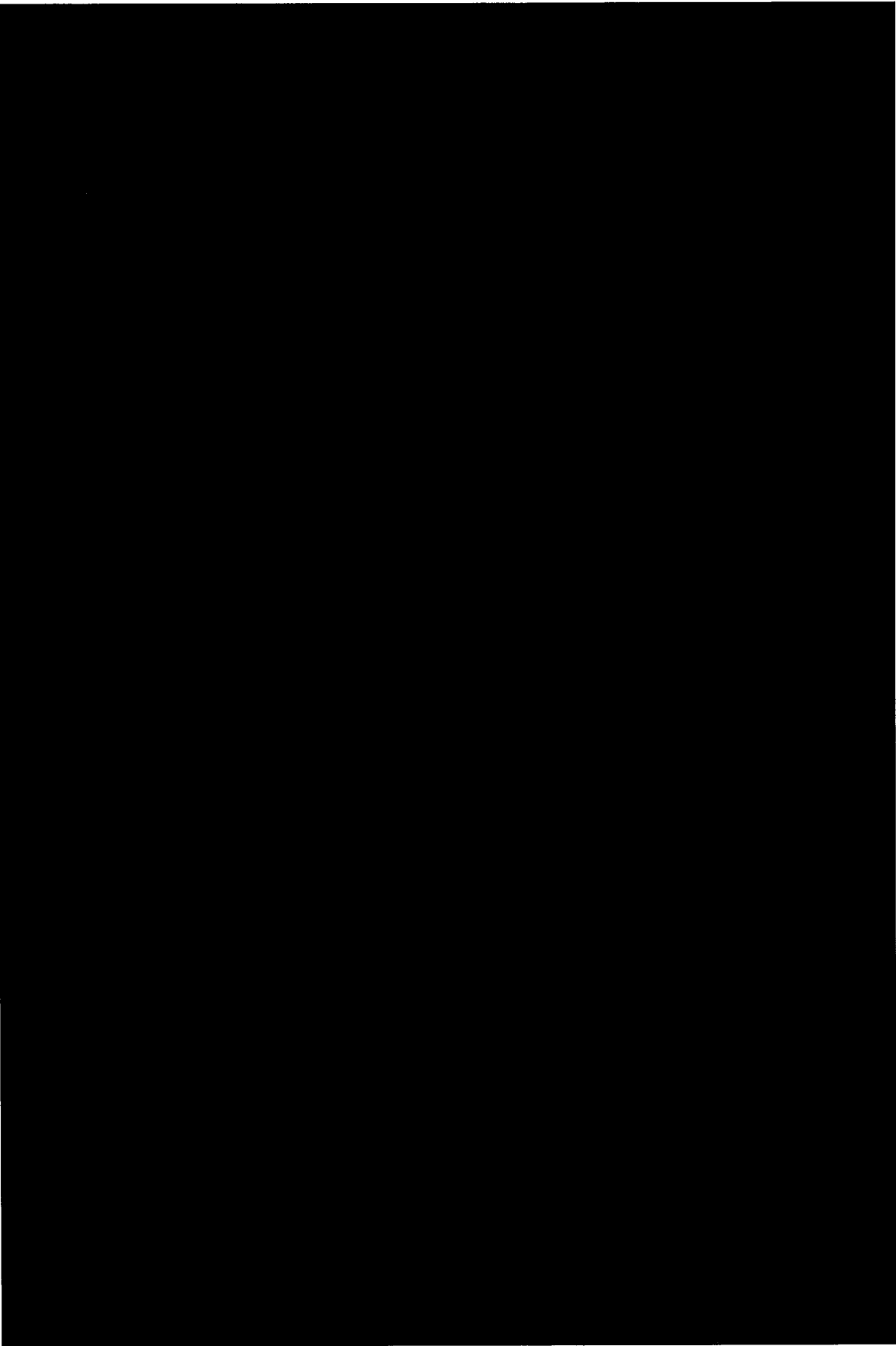
F. ANNEX F – CYBERSECURITY

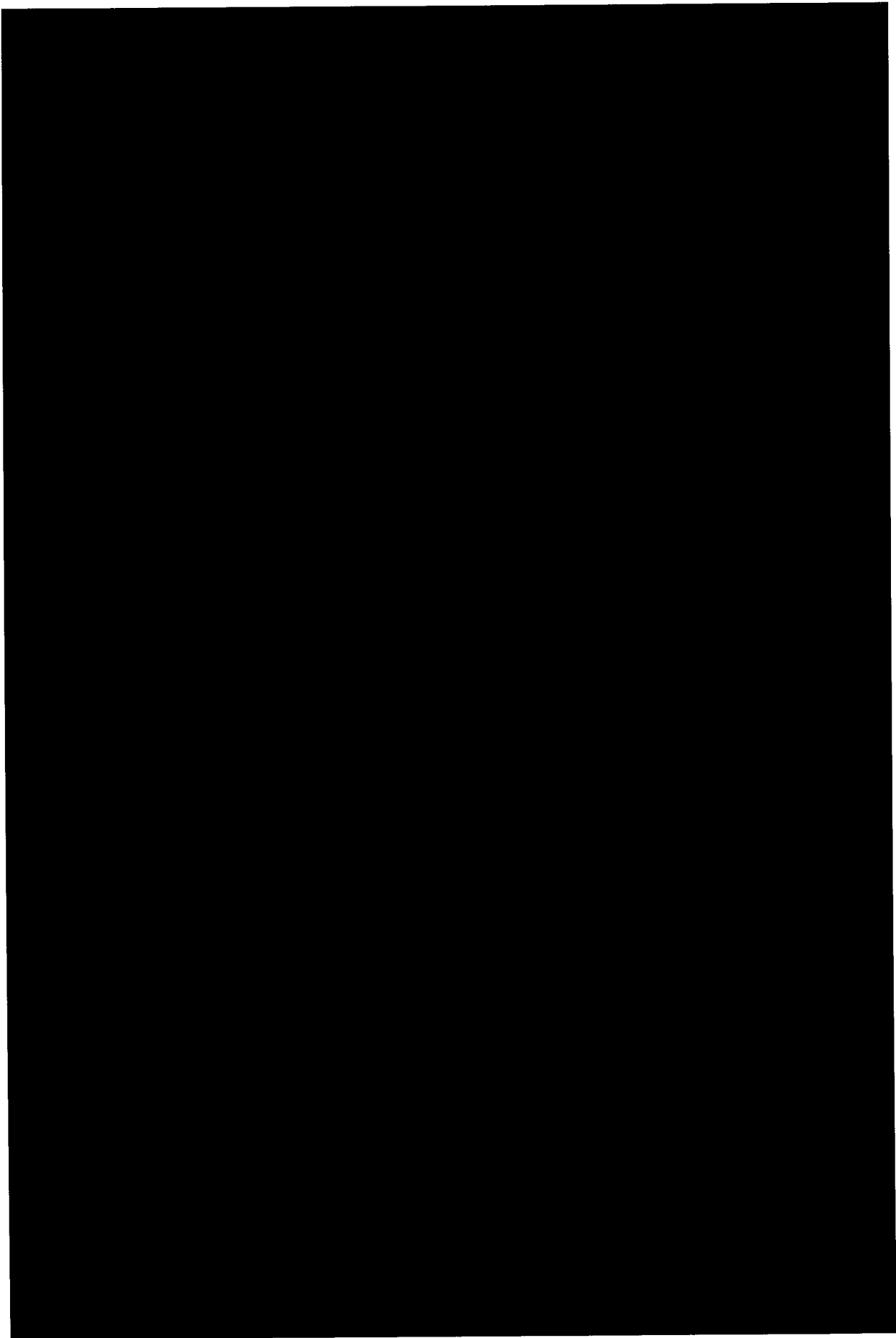
Below is KCE's Cybersecurity Incident Response Plan. KCE maintains additional cybersecurity-related plans not submitted herein.

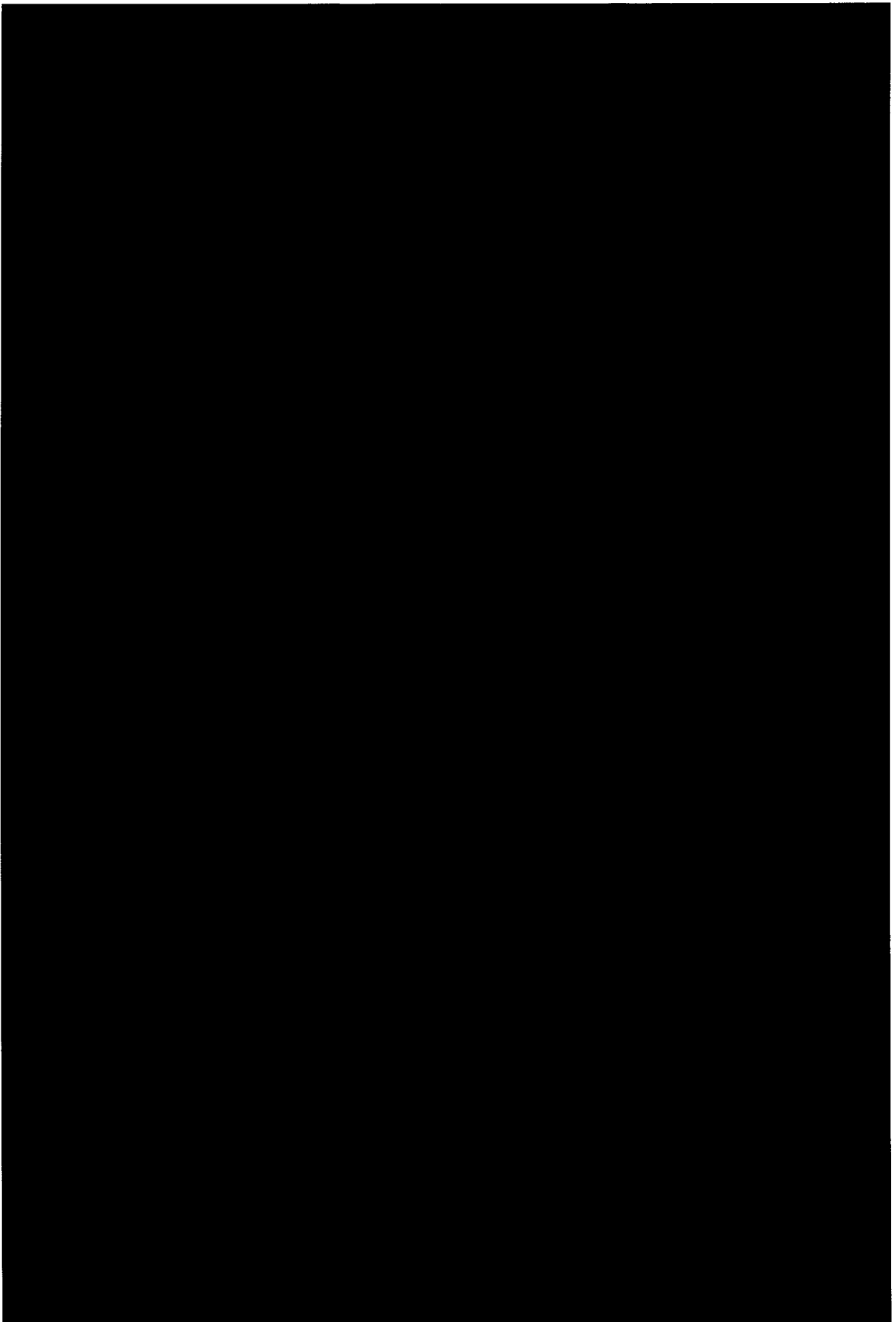


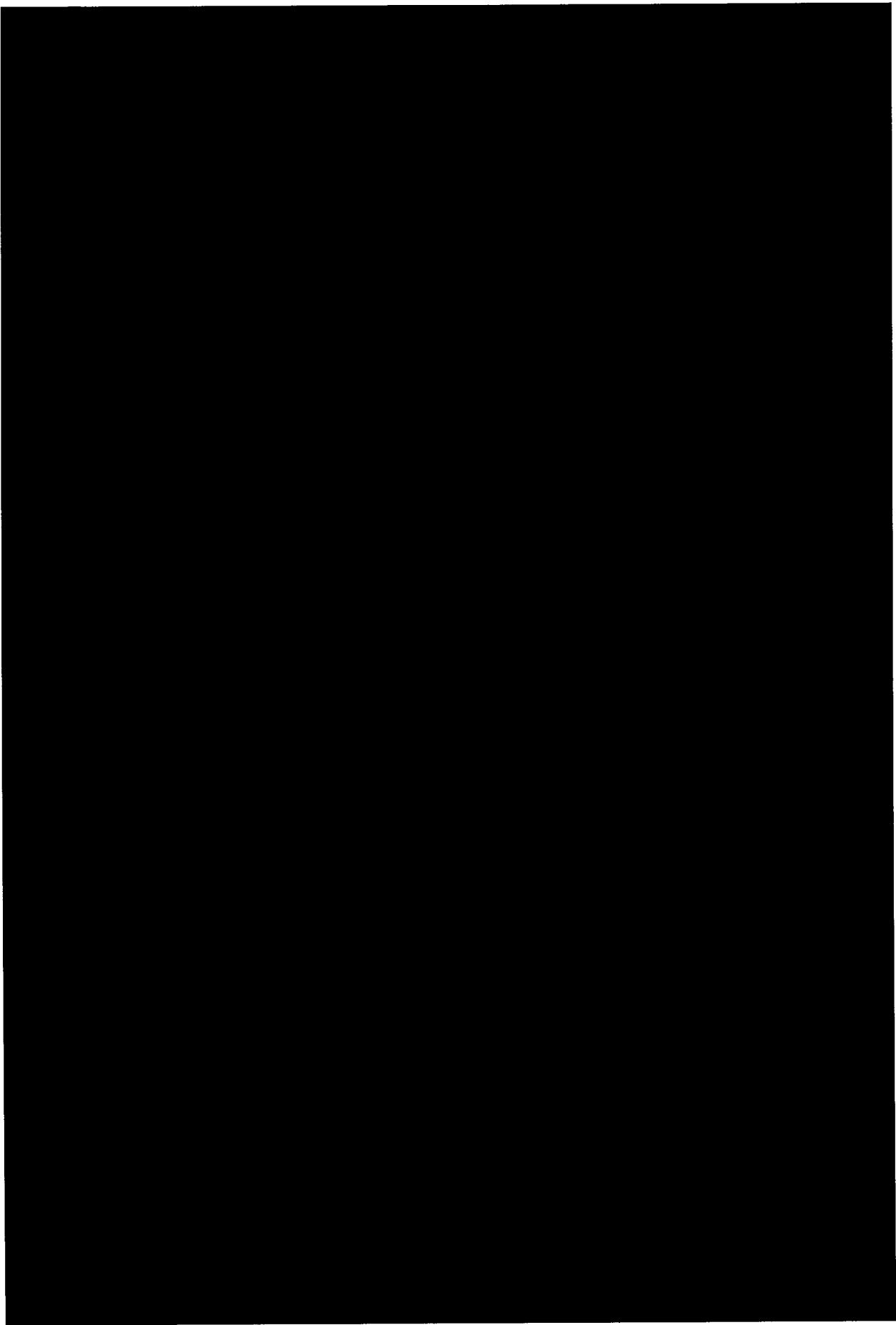


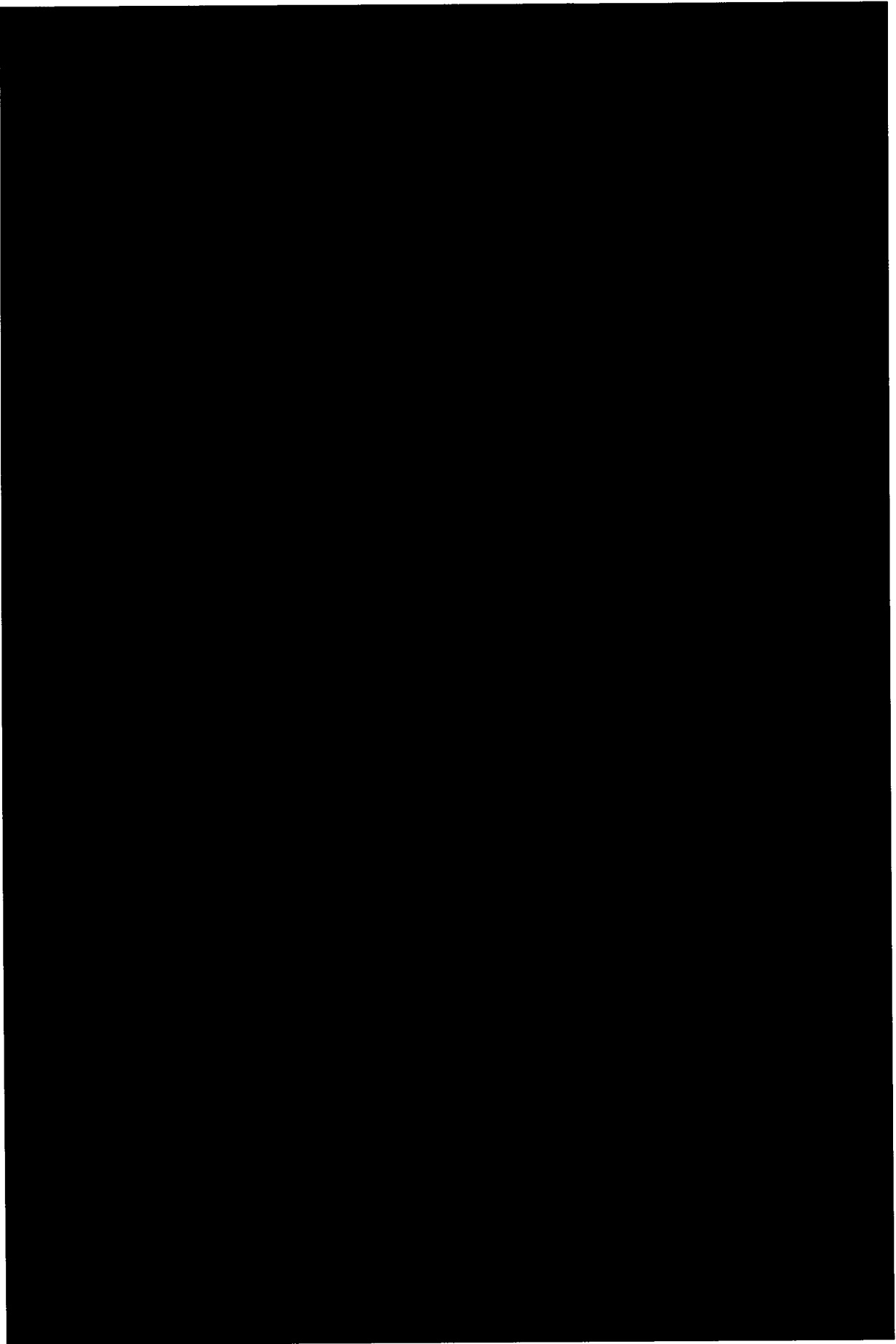


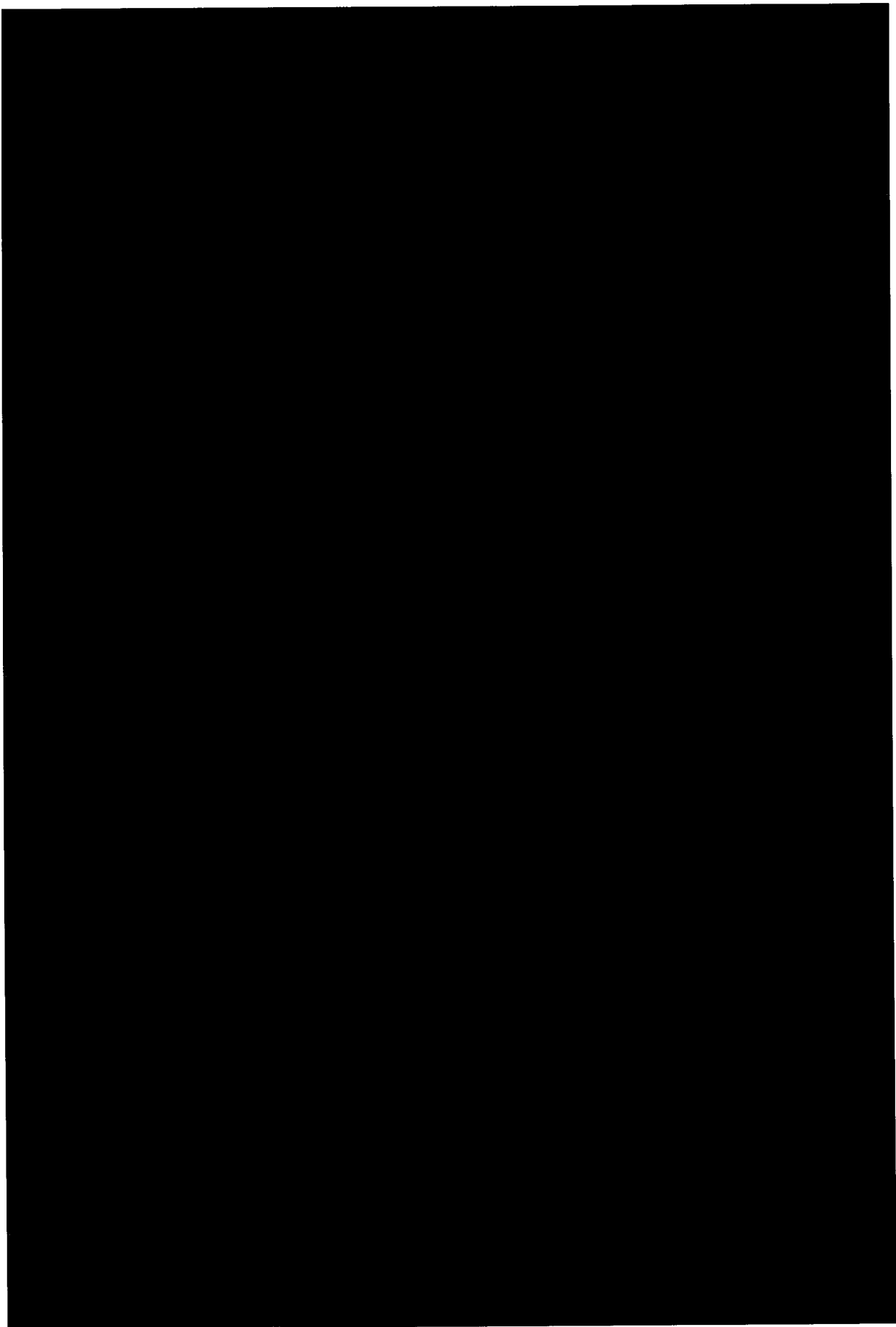


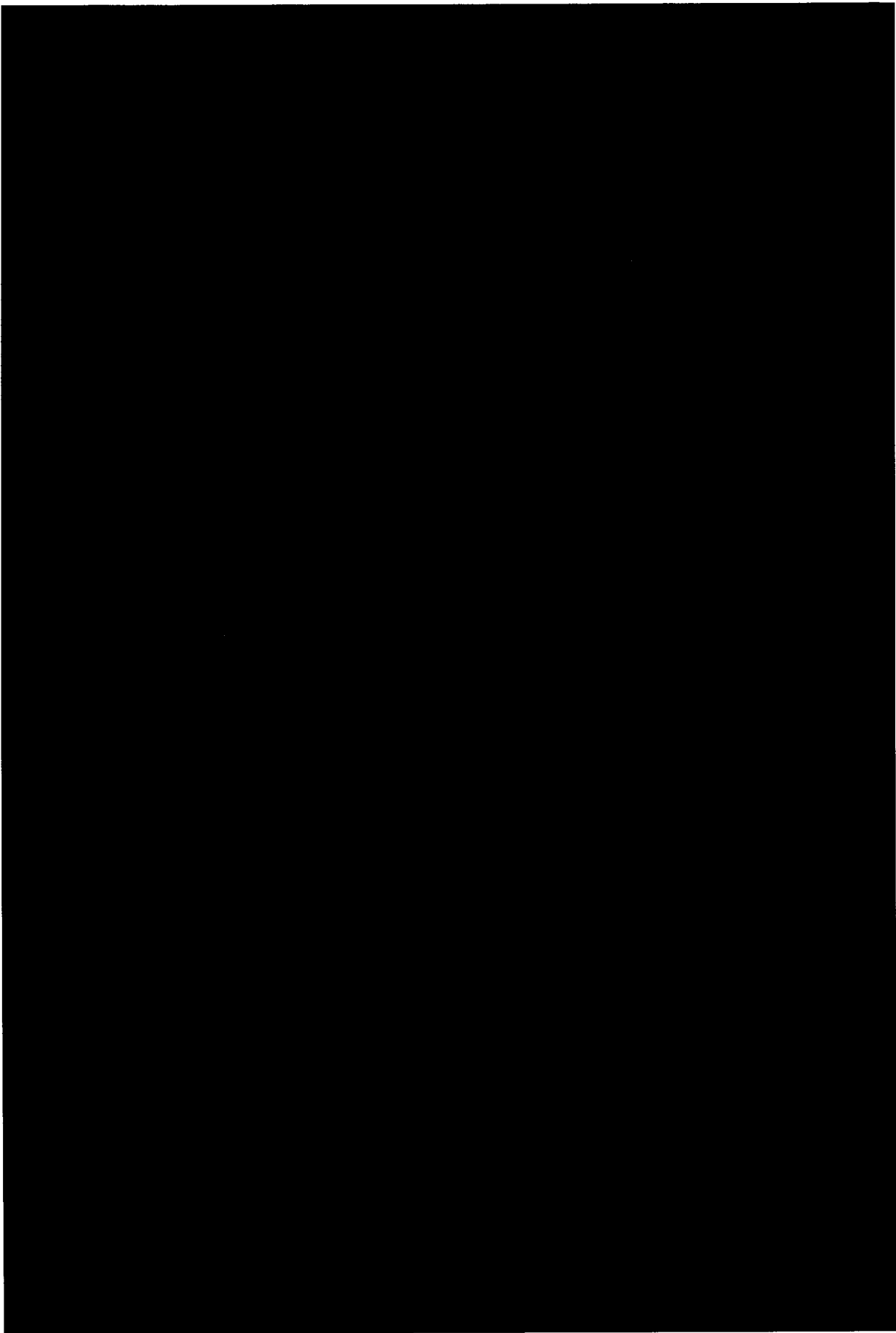


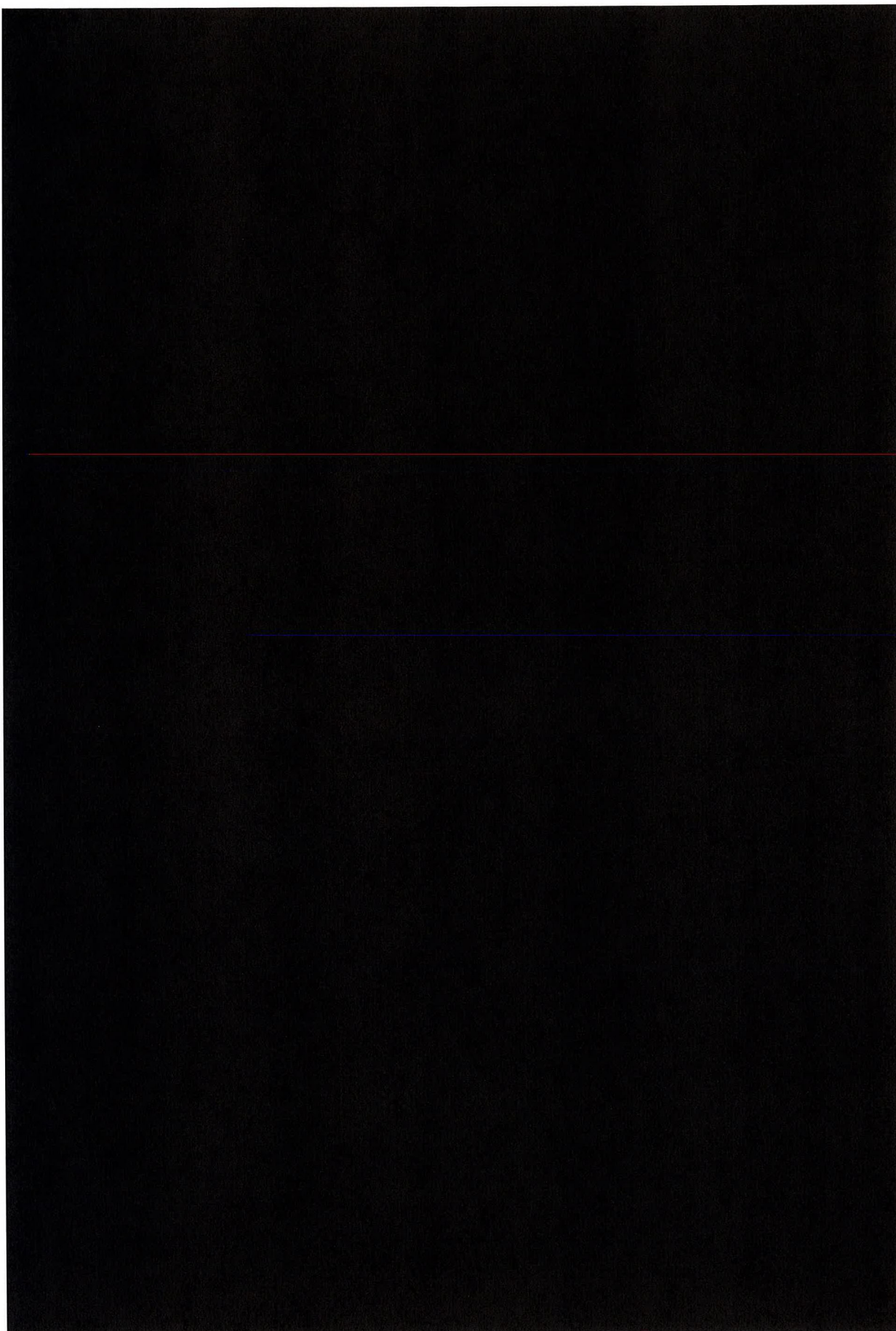


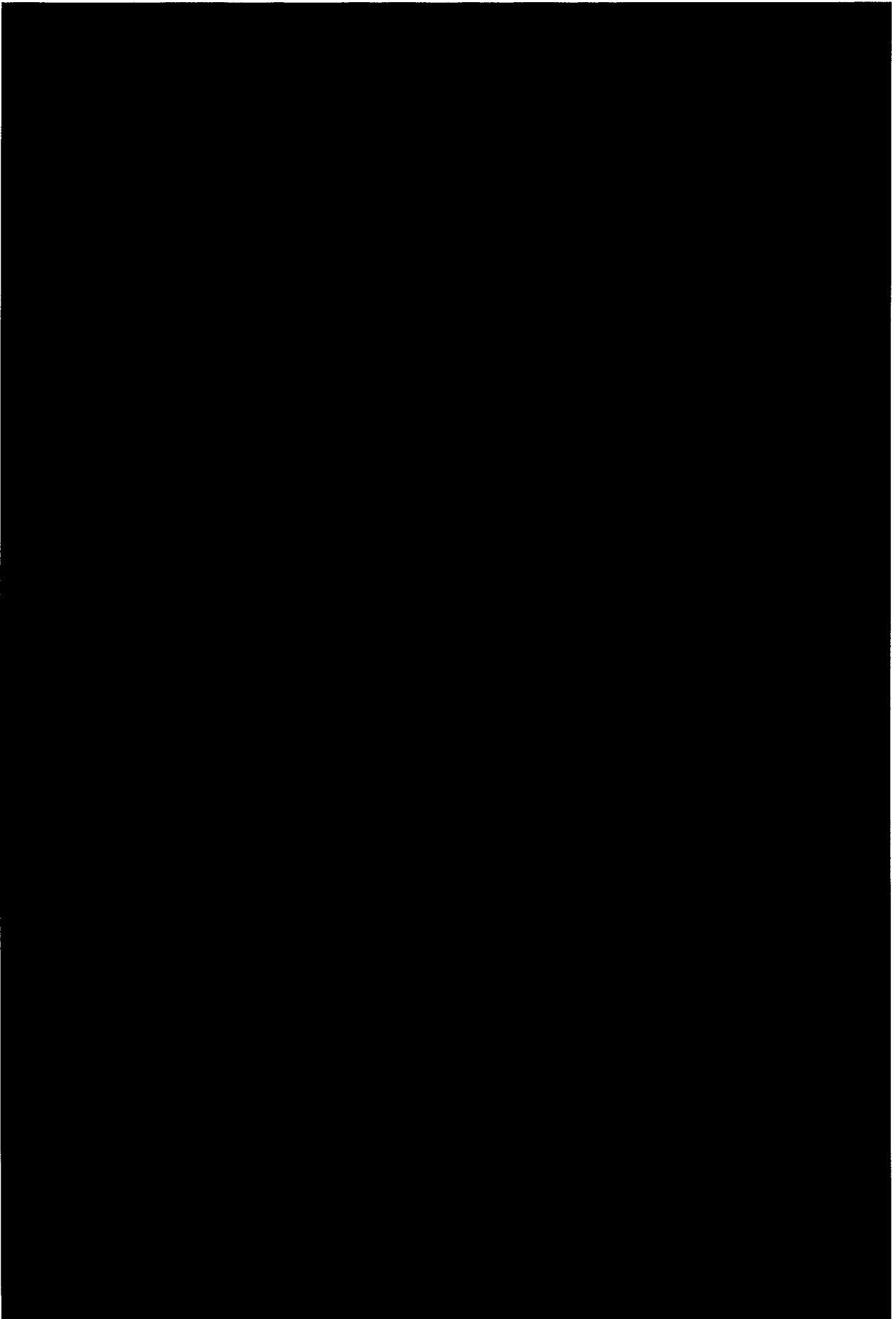












III. ANNEXES (cont'd)

G. ANNEX G – PHYSICAL SECURITY

Sabotage may take different forms and it would be impossible to define any and all sabotage that could occur. KCE follows the NERC Event Reporting Plan used to comply with NERC Standard EOP-004, implemented to adhere to NERC's Critical Infrastructure Protection ("CIP") Standard, CIP-003. Additionally, the following checklist shall be used when responding to physical security, as well as cybersecurity, incidents:

1	If sabotage has been identified or reported immediately notify the O&M Manager.
2	The O&M Manager will determine when and if it is safe for personnel to continue work on site (if personnel are on-site) and, as required, make appropriate notifications to personnel based on initial information and site condition.
3	If appropriate call 911 or another designated Emergency Services provider. Refer to site contact and location information to ensure prompt response
4	If off-site Emergency Response personnel are required, the O&M Manager shall coordinate to ensure access to the site and proper direction
5	If appropriate, the O&M Manager shall notify appropriate law enforcement as necessary to conduct an investigation.
6	If sabotage resulted in creating an unacceptable safety risk, the affected equipment shall be shut down or affected area cleared and barricaded.
7	The O&M Manager shall notify the HSEQ Director and CIP Senior Manager to determine whether the event is reportable in accordance with NERC Reliability Standard EOP-004.

III. ANNEXES (cont'd)

H. ANNEX H – FIRE

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

III. ANNEXES (cont'd)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

III. ANNEXES (cont'd)

[REDACTED]

[REDACTED]

[REDACTED]

III. ANNEXES (cont'd)

I. ANNEX I – TOXIC GAS RELEASE

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

- I. [REDACTED]
- I. [REDACTED]
- I. [REDACTED]
- I. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

III. ANNEXES (cont'd)

J. ANNEX J – MEDICAL EMERGENCY

If an employee is injured, or an accident has occurred on site and first aid is not enough treatment for the emergency, 911 must be called. The call to 911 can be made by phone by any available personnel.

A second notification will be made to Contact the KCE emergency contact phone number posted onsite to inform the ERC.

1. Serious Injury

The following procedures apply for serious medical injuries such as unresponsive subject, bite / sting for personnel who are allergic, bone fractures, neck trauma, or severe burns after 911 has been called.

- on-site personnel shall meet EMS responders at site entrance and direct them to incident location
- do not leave or move the injured unless directed to by emergency medical service personnel
- administer first aid if necessary
- ERC shall inform Human Resources to contact employee's personal emergency contact
- follow the incident reporting guidelines included in KCE Health, Safety, and Environmental (HSE) Manual

2. Non-Emergency Safety Incident

In the event a safety incident occurs where emergency response is not required (first aid treatment, near miss, etc.) work is to be stopped immediately and reported to the Operations Manager. Risk will be reassessed, adequate controls implemented, and the situation made safe before resuming the task. The Operations Manager shall follow the incident reporting guidelines included in the KCE HSE Manual.

III. ANNEXES (cont'd)

K. ANNEX K – SEISMIC EVENT

BESS are normally unmanned facilities designed to local codes and standards and therefore have limited exposure to hazards associated with earthquakes.

Earthquakes may strike with little to no advance warning. As such, when an earthquake does occur, it is important to stay as safe as possible. Be aware that some earthquakes are actually fore-shocks, and a larger earthquake may subsequently occur. Also, be aware that many earthquakes are accompanied by aftershocks after the main event has occurred. If an earthquake occurs minimize your movements to a few steps to a nearby safe place until the shaking has stopped. Move away from the enclosures, structures, light poles, and utility wires. If safe to do so, personnel shall take the First Aid kit with them.

Once in the open stay there until the shaking stops to prevent being hit by falling debris.

Following seismic events, the facility will be evaluated by O&M personnel for damage. All repairs will be performed under standard operational procedures.

III. ANNEXES (cont'd)

L. ANNEX L – HAZARDOUS MATERIAL SPILL

The KCE HSE Manual provides guidance for pollution prevention and spill response. The SDS shall be reviewed, and the area evacuated if necessary. Only properly trained personnel with appropriate PPE shall clean up a spill.

III. ANNEXES (cont'd)

M. ANNEX M – WORKPLACE VIOLENCE

To ensure a safe work environment for all employees, KCE expressly prohibits any acts or threats of violence by any employee against any other employee, client, vendor, or visitor, or self-inflicted violence, except in extreme cases where self-defense may become necessary. If any behavior is noticed that could be perceived as an act or threat of violence, inform the O&M Manager, who will contact the authorities.

III. ANNEXES (cont'd)

N. ANNEX N – BOMB THREAT

[REDACTED]
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[REDACTED]
[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
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- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

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- [REDACTED]

[REDACTED]

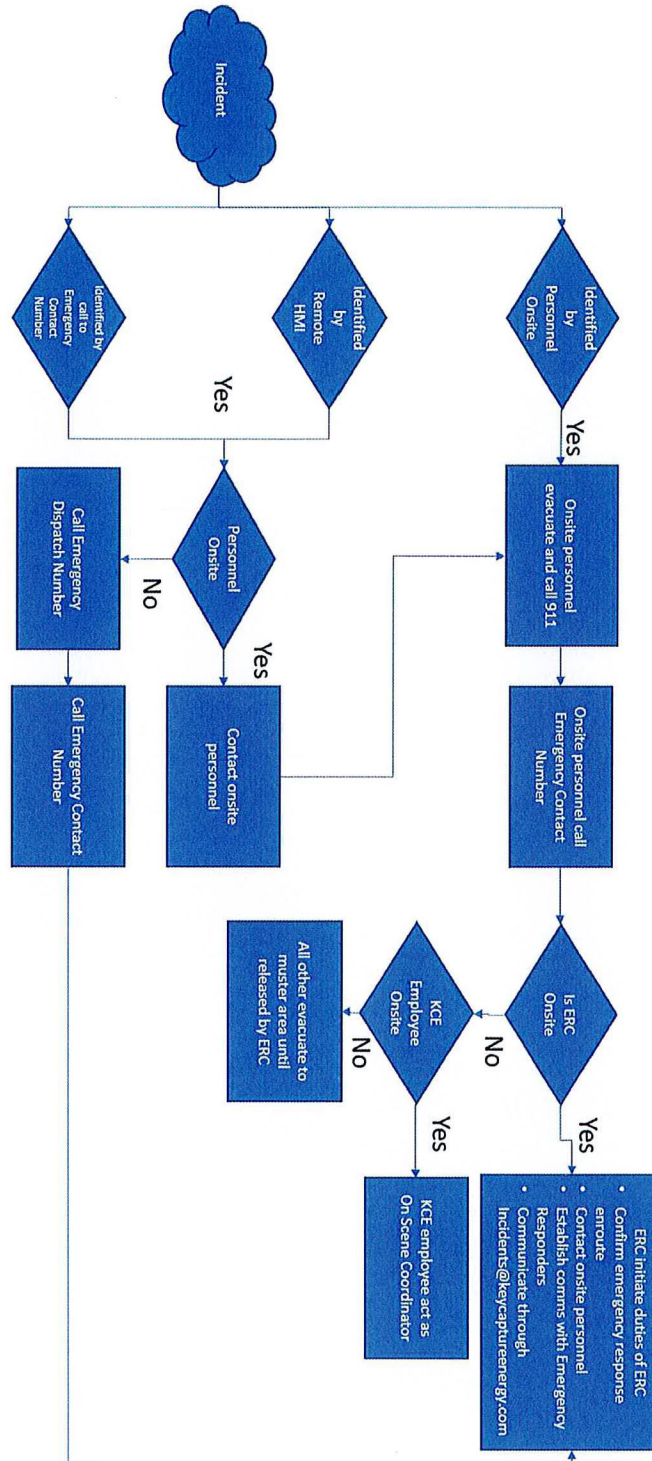
- [REDACTED]
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- [REDACTED]
- [REDACTED]

III. ANNEXES (cont'd)

[illegible]

IV. APPENDICES

A. APPENDIX 1 – RESPONSE FLOWCHART



IV. APPENDICES (cont'd)

B. APPENDIX 2 – CHECKLISTS

For each checklist item:

- If the item inspected is satisfactory, check the OK box
- If a deficiency is identified, complete the Comments section and indicate the Action Taken
- If the item does not apply, check the N/A box

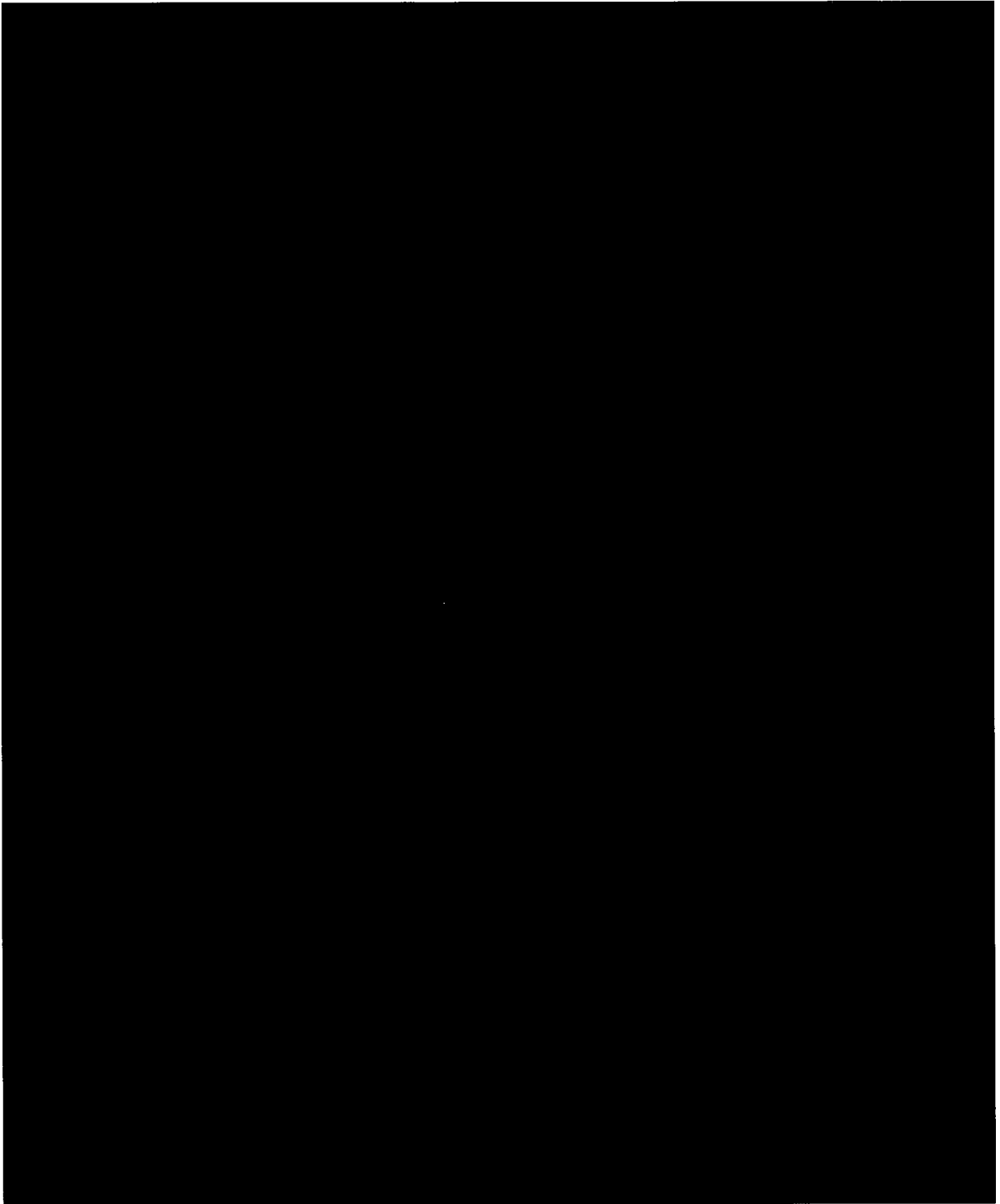
Emergency Response	OK	N/A	Action Taken / Comments
Facility evacuated, if required			
Emergency responders en route, if required			
Communications established with emergencyresponders			
BESS disconnected from grid, if required			
Crisis communications plan initiated, if required			
Other			

Emergency Response Planning	OK	N/A	Action Taken / Comments
Emergency response plans (including importantphone numbers) written and available			
Training provided and drills performed for persons required to implement emergencyresponse			
Housekeeping maintained to ensure egress paths are clear and no missile hazards exist inperiods of high winds			
Site work cancelled in advance of extreme weather			
ROC informed of potential for extreme weather			

Fire & Explosion Prevention	OK	N/A	Action Taken / Comments
Fire extinguishers inspected monthly and servicedby contractor annually			
Emergency telephone number posted in clearand conspicuous locations			
Trash is removed at least daily from building			
Fire, smoke, H2 detection systems and HVAC inspected and serviced			
Exterior locations free of trash and combustible debris			

IV. APPENDICES (cont'd)

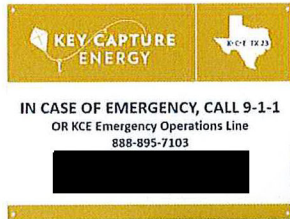
C. APPENDIX 3 – BOMB THREAT CHECKLIST



IV. APPENDICES (cont'd)

D. APPENDIX 4 – SITE INFORMATION

C



*** **911** should be used during an emergency ***

TX23 Roughneck Storage



Brazoria County Emergency Services Dispatch

West Columbia City Police
Phone 979-345-5121

Fire Department

West Columbia Volunteer Fire Department
314 E Clay St.
West Columbia, TX 77486
Phone 979-345-3416

Police

West Columbia City Police

IV. APPENDICES (cont'd)

310 E Clay St.
West Columbia, TX 77486
Phone 979-345-5121

Medical

Sweeny Community Hospital
305 N McKinney St.
Sweeny, TX 77480
Phone 979-548-1500



KCE / TX23 Emergency Operations Line

Phone 516-619-9459

Poison Control Center

Phone 800-222-1222