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March 6, 2024

Central Records
Public Utility of Texas

Dear PUCT Central Records Staff,

Blue Cloud Wind Energy LLC ("Blue Cloud") filed confidential information contained in its initial Emergency Operation Plan ("EOP") filing with the Commission on April 15, 2022. The confidential information should have been redacted. We request that the Commission remove/void the original filing in project 53385 item number 259 and replace with the attached filing documents.

The replacement EOP contained in this document has all the confidential information redacted.

Thank you!

Sincerely,

A handwritten signature in black ink, appearing to read "Hailing Zang".


Hailing Zang
Compliance Specialist

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2




Blue Cloud Wind Energy, LLC

File Name	BC-OMP-HSE-PL-HSE Emergency Operations Plan
Process	Emergency Operations Plan
Date	04/15/2022
Revision	2
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	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Contents

1	Introduction	4
2	Scope 4	
3	Responsibility	4
3.1	Site Manager or Designees	4
3.2	Central Operations Team or Designees	4
3.3	Office of Company with Binding Authority	4
3.4	Site Personnel.....	5
3.5	Real-Time Coordination for Operations and Site Outages	5
3.6	Real-Time Coordination for Emergencies.....	5
3.7	Muster Points	5
3.8	Fire Wardens	6
4	Definitions.....	6
5	Plan Elements.....	6
5.1	Site Emergency Contact Information.....	6
5.2	EOP Hotline Information.....	7
5.3	Response Equipment and Emergency Supply Locations.....	7
5.4	Notification Requirements	7
5.5	Site Evacuation	8
5.6	Severe Weather and Natural Disasters	8
	Earthquakes	8
	Flooding.....	9
	Hurricanes/Typhoons	10
	Landslides.....	10
	Drought	11
	Tornadoes.....	11
	Tsunamis	11
	Extreme Heat.....	11
	Winter Storms and Extreme Cold	12
5.7	Extreme Hot and Cold Weather Operations	13
5.8	Fire Emergencies	14
5.9	Medical Emergencies	14
5.10	Bloodborne Pathogens.....	15
5.11	Arc Flash Incident – LV/HV Electrical Shock	15
5.12	Bomb/Terroristic Threats	16
5.13	Active Shooters	17
5.14	Business Continuity Plan.....	17
5.15	Critical Infrastructure Protection.....	17
5.16	Restoration Plan.....	17
5.17	Pandemic/Epidemic Plan	18
5.18	Spill Response	18

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

5.19	External Communications	18
5.20	Annual Exercise Requirements	19
6	References.....	19
7	Revision Control	19
Appendix A: Site Map.....		20
Appendix C: 911 Emergency Address and GPS Information		23
Appendix D: Site Emergency Supplies		24

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

1 Introduction

Blue Cloud Wind Energy LLC is a Power Generation Company operating in Southwest Power Pool.

The purpose of this plan is to provide general guidelines for evaluating and responding to any emergency condition at the Blue Cloud Wind Energy site. The individual responsible for maintaining this plan in the Site Manager. The Asset Manager can also edit this document.

2 Scope

This plan is applicable to and provides directions and response for all employees and visitors to any emergency condition at Blue Cloud facilities. This plan provides guidelines for emergencies that include spills, fires, explosions, bomb threats, and personnel injuries. All employees shall be trained in the actions that are to be taken should an emergency occur. Relevant elements of this plan will be communicated to all visitors during their Site Safety Orientation Training.

3 Responsibility

3.1 Site Manager or Designees

Is responsible for the overall implementation and enforcement of this plan.

Review and approve all non-administrative changes to this plan.

Are responsible to assure consistent and effective training of this plan.

Will be responsible for ensuring all site personnel under their direct supervision are trained on the contents of this plan.

Is responsible for reporting all incidents that occur at the Blue Cloud facility.

Will sponsor an annual exercise of this plan and serve as a liaison with local first responders for Fire, Police, EMS Helicopter Rescue (as applicable), and Spill Response.

Will coordinate with staff and appropriate contractors to ensure damaged facilities can safely be returned to service as soon as possible. This will include staffing plans for plant personnel for the time the plant is under an emergency.

3.2 Central Operations Team or Designees


Is responsible for the technical content of this plan and its compliance with all Federal and State safety regulations and requirements.

Prepares and issues all changes to this plan.

Performs periodic audits of field locations to determine the level of compliance with this plan and areas for improvement.

3.3 Office of Company with Binding Authority

Is responsible for final approval of the Emergency Operating Plan.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2


3.4 Site Personnel



All Site Personnel will receive training appropriate to the level of their assigned roles through various methods that include an initial orientation, regularly scheduled safety meetings, review of the safety procedures, and formal training programs. Employees will learn the following:

- How to protect their safety and use evacuation procedures.
- Their roles and responsibilities during emergencies.
- How to identify conditions that may lead to an emergency condition.
- The steps to take to prevent emergency situations.
- Their expected response actions during emergencies; and
- Reporting of emergency situations, when found.


Site personnel are responsible to assist with evacuations and search if needed. Conduct a clean sweep of all buildings during emergencies. Perform searches of the area and check normally unoccupied rooms and spaces. Close all doors of rooms that have been searched. Stop and contain spills when discovered. Use fire extinguishers only if they feel safe doing so. Assist outside emergency response personnel, as needed.

3.5 Real-Time Coordination for Operations and Site Outages

 serves as Energy Manager. The Real Time desk is manned on a 24/7 basis and serves as a 24-hour point of contact for all site emergencies that impact generation or operational readiness, especially those which may occur outside of normal operating hours. The Site Manager is the primary coordinator with Energy Manager.

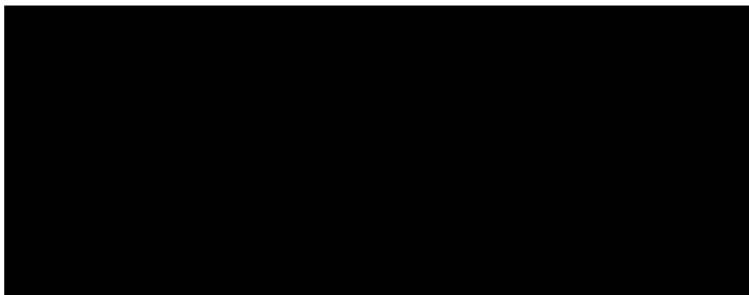
 regularly monitors weather conditions at all operating wind farms. Should severely weather conditions be expected,  will notify Site Manager of any changes in weather status that may be hazardous to turbine operation or any persons on site.


3.6 Real-Time Coordination for Emergencies

During all Serious Incident Events, the Site Manager will coordinate with  and all personnel on site. The O&M Building will serve as the Emergency Control Center (ECC) and will be the base of emergency response activities for the Emergency Management Committee (EMC). The EMC provides the coordination and control of the wind farms via the Emergency Operation Center (EOC) in accordance with Emergency Action Plan.

3.7 Muster Points

The Emergency Operations Plan (EOP) Muster Points are the places where site employees will gather during an emergency or after a disaster to take roll call, organize rescue and first aid, and support teams.



	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

On-Site

Manager

Once individuals are gathered at the ERP Rally Point, take headcount and immediately report to management.

3.8 Fire Wardens

Are responsible for knowing and adhering to this plan.

Are responsible for knowing the layout of their work area/office and the assembly/muster point.

Are responsible for the safe evacuation of their work area/office and fellow co-workers during an emergency evacuation.

Are responsible for conducting a final sweep of their designated area before leaving the work area/office.

Shall maintain a roster of co-workers that need special assistance evacuating, including pregnant women. Those that need assistance should have two designated assistants, one to seek help and one to remain with the co-worker in a designated area until professional help arrives (EMS, firefighters, etc.)

During an evacuation:

- Check all office cubes, rooms, restrooms, work areas, etc. for people.
- Do NOT lock any doors (some doors are automatically locked. In the event of an emergency, the fire department should have a key to override the system to access the office).
- Do NOT use elevators or allow fellow co-workers to use elevators.
- Instruct co-workers to take essential personal items but inform them to not return for their items if they are already evacuating down the stairs/out of the building.
- Report emergencies to the Site Manager.
- If anyone refuses to evacuate, report the person to the Site Manager.
- Fire Wardens are the last to evacuate.

4 Definitions

Emergency Control Center (ECC) – The O&M Building is designated as the Emergency Control Center. In the event that the O&M Building is inaccessible, the EMC will designate an acting control center.

Emergency Management Committee (EMC) - The Peak Wind Site Manager and the Vestas Site Manager are designated as the Emergency Management Committee.

Emergency Operation Center (EOC) This plan provides directions and response for all employees and visitors to any emergency condition at Blue

Bloodborne Pathogens - Means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV) and human immunodeficiency virus (HIV). All human blood and body fluids should be considered as if infectious, and all precautions should be taken to avoid contact.

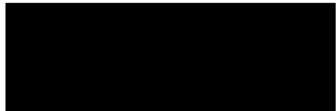
EOP Event - Declared by the Emergency Management Committee. An EOP Event has the potential to affect the entire company. For example, a pandemic event may affect multiple employees at multiple locations.

Serious Incident or Injury - Includes all fatalities, injuries/incidents involving the public, property damage in excess of \$1 million dollars, and significant damages to the environment. These events require immediate notification to the Asset Manager, Central Operations and Owner.

5 Plan Elements

5.1 Site Emergency Contact Information

Appendix A, Site Map Orientation Summary sheet.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Appendix B, Site Specific Information, including a copy of the Site-Specific Data Form
Appendix C, 911 emergency addresses information /site specific GPS coordinates information.
Appendix D, Site Emergency Supplies

5.2 EOP Hotline Information

The EOP Hotline applies when there is an Event that the Emergency Management Committee deems an EOP Event (see definition above).

There is an option for a remote voicemail access number to provide an Emergency Operating Procedures (EOP) Hotline.

The toll-free number to access the EOP Hotline is 512-256-4700.

If you are aware of or think there may be an EOP Event, you can access the EOP Hotline by pressing 1 during the announcement.

From there you will hear the most recent EOP update available.

A default message will be played during non-event situations.

NOTE: Under certain adverse conditions (e.g. severe weather, multiple events) it may not be possible to report the damage caused by an event and issue a written event report within the timing of the standard. In such cases, the affected Responsible Entity shall notify parties per Requirement R2 and provide as much information as is available at the time of the notification. Submit reports to the ERO via one of the following: e-mail: systemawareness@nerc.net, Facsimile 404-446-9770 or Voice: 404-446-9780, select Option 1.

5.3 Response Equipment and Emergency Supply Locations

Every wind farm O&M/Warehouse building is equipped with a First Aid Kit, Automated External Defibrillator (AED), Bloodborne Pathogens Kit, eyewash station, MSDS Database (MSDS Online), and fire extinguishers. Safety supplies are checked and restocked quarterly at a minimum.

Large Spill Kits (with 55-gallon drum over-pack capability) containing absorbent socks and pads are located in every wind farm Warehouse and Small Spill Kits are located in every O&M Vehicle.

Every wind farm O&M Vehicle will also contain a fire extinguisher and First Aid Kit.

Every Substation building is equipped with fire extinguisher(s), an eyewash station, with a battery spill kit for those with wet cell batteries.

In accordance with Fall Protection and Climbing Safety Rules: An emergency kit which includes a first aid kit, AED, fire extinguisher, rescue kit (ENSA APE, Tractel, Milan, RGIO, Petzl, etc.) and a bottle of water shall go up tower during every climb.


Emergency Supplies as listed in Appendix D.

5.4 Notification Requirements

Cell phones will be the primary method of notifying others of an emergency condition. Personnel on duty will supply their cell phone number for contact and the phone number should be inserted in the speed dial feature on all cell phones. An employee directory is available on the Global Address List in Outlook.

Should an employee discover an emergency situation, it is the employee's responsibility to notify the Site Manager and request help or instruct others to evacuate the site.

The call to the Site Manager will include a brief description of the problem, location of the problem and what assistance is needed. In the case of an evacuation, the instructions should be given concisely and repeated at least once for clear understanding. It is imperative that the employees do not panic but respond quickly and correctly.


	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2


5.5 Site Evacuation

In case of a major accident or incident such as a fire, everyone on site must evacuate the site and gather at the assembly point.

The assembly point is the main entrance to the wind farm O&M building.


Evacuation routes are the roads of the site to the main entrance and are shown on the site map included in Appendix A of this plan. Alternate routes are provided in case the emergency conditions prevent use of a particular route.

 will be responsible for accounting for all employees who are present at the assembly area and any who have not assembled but are still on the site.

The status of those accounted for and unaccounted for will be relayed by  employee to local authorities and first responders who may be answering the emergency call.

Any event that requires site evacuation shall be reported to the Asset Manager and Central Operations as soon as practical.

5.6 Severe Weather and Natural Disasters


Severe weather and natural disasters can occur at any  operating site and all personnel should be aware of the constantly changing weather conditions.

Natural disasters include earthquakes, flooding, hurricanes/typhoons, landslides, tornadoes, tsunamis, extreme heat, winter storms and extreme cold, and other natural disaster events.

Each wind farm site will monitor a local forecast for alerts and warnings issued for their area.

To prepare for upcoming storm/disaster events the Site Manager or their designee will conduct area inspections listing conditions that must be corrected.


Special attention should be paid to any object that may become a flying debris hazard during high winds. Items stored outdoors shall be secured in place or moved into a warehouse area.

No climbing is allowed when lightning is detected within 20 miles. All personnel will exit turbines when lightning is within 20 miles.  climbing rules are followed at Blue Cloud Wind Energy.

Earthquakes

During an earthquake if indoors:

- Take cover under a sturdy desk, table, or bench or against an inside wall, and hold on. If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building.
- Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
- Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported, loadbearing doorway.
- Stay inside until the shaking stops and it is safe to go outside. Most injuries during earthquakes occur when people are hit by falling objects when entering into or exiting from buildings.
- Be aware that the electricity may go out or the sprinkler systems or fire alarms may turn on.
- DO NOT use the elevators.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

During an earthquake if outdoors:

- Stay there.
- Move away from buildings, streetlights, and utility wires.

During an earthquake if trapped under debris:

- Do not light a match.
- Do not move about or kick up dust.
- Cover your mouth with a handkerchief or clothing.
- Tap on a pipe or wall so rescuers can locate you. Use a whistle if one is available. Shout only as a last resort— shouting can cause you to inhale dangerous amounts of dust.

After an earthquake:

- Be prepared for aftershocks.
- Be aware of possible tsunamis in coastal areas. When local authorities issue a tsunami warning, assume that a series of dangerous waves is on the way. Stay away from the beach.

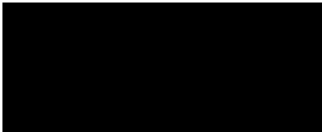
Flooding

During a flood:

- Listen to the radio or television for information.
- Be aware that flash flooding can occur. If there is any possibility of a flash flood, move immediately to higher ground. Do not wait for instructions to move.
- Be aware of streams, drainage channels, canyons, and other areas known to flood suddenly. Flash floods can occur in these areas with or without such typical warnings as rain clouds or heavy rain.

If you must evacuate or prepare to evacuate:

- Secure your office; turn off utilities at the main switches or valves if instructed to do so. Disconnect electrical appliances. Do not touch electrical equipment if you are wet or standing in water.
- Do not walk-through moving water. Six inches of moving water can make you fall. If you have to walk in water, walk where the water is not moving. Use a stick to check the firmness of the ground in front of you.
- Do not drive into flooded areas. If floodwaters rise around your car, abandon the car and move to higher ground if you can do so safely. You and the vehicle can be quickly swept away.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Hurricanes/Typhoons

During a hurricane/typhoon:

- Listen to the radio or TV for information.
- Secure the site; secure outdoor objects or bring them indoors.
- Turn off utilities if instructed to do so. Otherwise, turn the refrigerator thermostat to its coldest setting and keep its doors closed.
- Turn off propane tanks.
- Avoid using the phone, except for serious emergencies.
- Ensure a supply of water for sanitary purposes such as cleaning and flushing toilets. Fill large containers with water.

Evacuate during a hurricane/typhoon:

- If you are directed by local authorities to do so. Be sure to follow their instructions.
- If you work in a high-rise building—hurricane winds are stronger at higher elevations.
- If you work on the coast, on a floodplain, near a river, or on an inland waterway.
- If you feel you are in danger.

If unable to evacuate:

- Go to a wind-safe room.
- If you do not have a wind-safe room:
- Stay indoors during the hurricane and away from windows and glass doors.
- Close all interior doors—secure and brace external doors.
- Keep curtains and blinds closed. Do not be fooled if there is a lull; it could be the eye of the storm—winds will pick up again.
- Take refuge in a small interior room, closet, or hallway on the lowest level.
- Lie on the floor under a table or another sturdy object.


Landslides

During a landslide:

- Move away from the path of a landslide or debris flow as quickly as possible.
- Curl into a tight ball and protect your head if escape is not possible.

After a landslide:

- Stay away from the slide area. There may be danger of additional slides.
- Watch for associated dangers such as broken electrical, water, gas, and sewage lines and damaged roadways and railways.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Drought

During a drought:

- Ensure each truck carries extra water each day before leaving O&M.
- Stay on roadways and avoid driving in field or grassy areas.
- Look back frequently for signs of sparking.
- Carry shovels and sand in case of sparking events.

Tornadoes

- If you are under a tornado warning, seek shelter immediately!
- If you are in a structure (e.g. small building, high-rise building):
- Go to a pre-designated shelter area such as a safe room, basement, storm cellar, or the lowest building level.
- If there is no basement, go to the center of an interior room on the lowest level (closet, interior hallway) away from corners, windows, doors, and outside walls. Put as many walls as possible between you and the outside.
- Get under a sturdy table and use your arms to protect your head and neck.
- Do not open windows.

If you are in a vehicle:

- Get out immediately
- Go to the lowest floor of a sturdy, nearby building or a storm shelter.

If you are outside with no shelter:


- Lie flat in a nearby ditch or depression and cover your head with your hands. Be aware of the potential for flooding.
- Do not get under an overpass or bridge. You are safer in a low, flat location.
- Never try to outrun a tornado in urban or congested areas in a car or truck. Instead, leave the vehicle immediately for safe shelter.
- Watch out for flying debris. Flying debris from tornadoes causes most fatalities and injuries.

Tsunamis

- If there is a noticeable recession in water away from the shoreline, move away immediately.
- Turn on your radio to learn if there is a tsunami warning if an earthquake occurs and you are in a coastal area.
- Move inland to higher ground immediately and stay there.

Extreme Heat

- Stay indoors as much as possible and limit exposure to the sun.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2


- Stay on the lowest floor out of the sunshine if air conditioning is not available.
- Consider spending the warmest part of the day in air-conditioned facilities.
- Eat well-balanced, light, and regular meals. Avoid using salt tablets unless directed to do so by a physician.
- Drink plenty of water and limit intake of alcoholic beverages after working hours.
- Dress in loose-fitting, lightweight, and light-colored clothes that cover as much skin as possible.
- Protect face and head by wearing a wide-brimmed hat.
- Avoid strenuous work during the warmest part of the day. Use a buddy system when working in extreme heat, and take frequent breaks.

Winter Storms and Extreme Cold

During a winter storm:

- Listen to your radio, television, or NOAA Weather Radio for weather reports and emergency information.
- Eat regularly and drink ample fluids but avoid caffeine and alcohol.
- Avoid overexertion when shoveling snow.
- Overexertion can bring on a heart attack.
- If you must shovel snow, stretch before going outside.
- Watch for signs of frostbite.
- Signs include loss of feeling and white or pale appearance in extremities such as fingers, toes, ear lobes, and the tip of the nose.
- If symptoms are detected, get medical help immediately.
- Watch for signs of hypothermia.
- Signs include uncontrollable shivering, memory loss, disorientation, incoherence, slurred speech, drowsiness, and apparent exhaustion.
- If symptoms of hypothermia are detected, get the victim to a warm location, remove wet clothing, warm the center of the body first, and give warm, non-alcoholic beverages if the victim is conscious.
- Get medical help as soon as possible.
- Conserve fuel, if necessary, by keeping your building cooler than normal. Temporarily close off heat to some rooms.
- Maintain ventilation when using kerosene heaters to avoid build-up of toxic fumes. Refuel kerosene heaters outside and keep them at least three feet from flammable objects.
- Drive only if it is absolutely necessary. If you must drive, consider the following:
- Travel in the day, don't travel alone, and keep others informed of your schedule
- Stay on main roads; avoid back road shortcuts

If a blizzard traps you in a car:

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

- Pull off the highway. Turn on hazard lights and hang a distress flag from the radio antenna or window.
- Remain in your vehicle where rescuers are most likely to find you.
- Do not set out on foot unless you can see a building close by where you know you can take shelter.
- Be careful; distances are distorted by blowing snow. A building may seem close, but be too far to walk to in deep snow.
- Run the engine and heater about 10 minutes each hour to keep warm.
- When the engine is running, open an upwind window slightly for ventilation to prevent possible carbon monoxide poisoning.
- Periodically clear snow from the exhaust pipe.
- Exercise to maintain body heat, but avoid overexertion. In extreme cold, use road maps, seat covers, and floor mats for insulation. Huddle with passengers and use your coat for a blanket.
- Take turns sleeping. One person should be awake at all times to look for rescue crews.
- Drink fluids to avoid dehydration.
- Be careful not to waste battery power. Balance electrical energy needs—the use of lights, heat, and radio—with supply.
- Turn on the inside light at night so work crews or rescuers can see you.
- If stranded in a remote area, stomp large block letters in an open area spelling out HELP or SOS and line with rocks or tree limbs to attract the attention of rescue personnel who may be surveying the area by airplane.
- Leave the car and proceed on foot—if necessary— once the blizzard passes.

After Severe Weather and Natural Disasters

- Watch out for broken glass, debris, and fallen power lines.
- Do not enter damaged areas until you are told it is safe.
- Do not use an open flame or light cigarettes; combustibles may be present.
- Be cautious when entering damaged structures.


5.7 Extreme Hot and Cold Weather Operations

Site Manager will inspect the O&M building and substation air conditioning heating/cooling units and serviced if necessary before each Summer and Winter.

Site Managers will ensure spare parts inventories are evaluated to determine if any equipment or components with historically long lead time items due to heavy usage in summer/winter periods should be acquired to avoid downtime waiting for shipments. (Filters, grease etc.).

Prior to the extreme summer and winter weather, Site Manager will adequately staff to compensate for winter road conditions.

The Site Manager will use the general guidelines below in a checklist to ensure adequate steps are taken prior to each Summer and Winter.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Plant personnel will go through the wind turbines to ensure no clogged filters hinder air flow during regular maintenance cycle.


Extreme Weather Check List:

Cold Weather Generation Check List	Available / Adequate
Ice melting salt at O&M building	Y / N / NA
Substation air filters	Y / N / NA
O&M building air filters	Y / N / NA
Snow removal vendors	Y / N / NA
Emergency on call list of employees	Y / N / NA
Manager emergency shift rotation	Y / N / NA
Food and water supplies	Y / N / NA
Hot Weather Generation Check List	
Substation air filters	Y / N / NA
O&M building air filters	Y / N / NA
Turbine air filters (inverter, nacelle, tower)	Y / N / NA
Food and water supplies	Y / N / NA

5.8 Fire Emergencies

Fire emergencies may occur on site as a result of grassfire/wildfire, substation fire, turbine fire, warehouse/product storage area fire, or landowner structure fire.

Anyone who observes or receives information regarding a fire emergency situation shall immediately notify the Site Supervisor or available personnel via cell phone or on any radio channel.

 will answer and instruct all involved to evacuate the affected area. The Site Manager will call 911 or call to the office to notify administrative assistant to call 911.

Minor fires may be managed and controlled with a fire extinguisher. Only use a fire extinguisher if you feel safe doing so and have had hands-on training.

Major fires will be managed by professional firefighters. For most structures on a wind farm the most practical response may be controlling the fire so that it does not spread and allowing the fire to burn itself out.

Special precautions must be taken during substation fires to prevent emergency response personnel from transformer mineral oil explosion and electrocution hazards.

5.9 Medical Emergencies

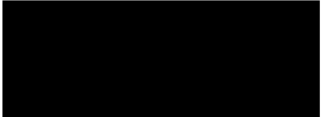
If an accident involving someone on site occurs which results in a medical emergency your immediate actions should include the following:

Stop the accident/machine or cause of the accident if possible.

Provide lifesaving first aid.

Call 911 if it is a life-threatening injury, head injury, spinal injury, amputations, significant mechanism of injury, blunt trauma force, fall from 20' or more, or penetration into body cavity or organs. Do not drive the injured victim to the hospital. Wait for EMS or airlift. When calling, provide:

- Your name and Phone number

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

- Name of injured person
- Nature of injury
- Location of the injured person

For non-life-threatening injury provide first aid to the injured; and inform the Site Manager.

5.10 Bloodborne Pathogens

As defined above Bloodborne Pathogens are microorganisms that are present in human blood and can cause disease in humans and therefore must be protected against.

Every wind farm O&M/Warehouse building is equipped with a Bloodborne Pathogens Kit which contains at a minimum: towels, biohazard bag with tie, surface cleaner for sterilization, and gloves.

All employees shall exercise universal precautions through the use of appropriate PPE (consider ALL untested human blood and body fluids are infectious) when handling blood or Other Potentially Infectious Material (OPIM) and any objects which could be contaminated with blood or OPIM.

If an employee has a contact with contaminated material to a part of his/her body not protected by PPE, the affected skin shall be immediately washed and flushed thoroughly with soap and water. Notify the Site Supervisor and the HSE Department.

Employees are required to wash and flush their hands with soap and water upon removal of protective gloves.

Gloves are to be removed using the “inside-out method” by pulling the cuff of the glove over the remainder of the glove resulting in the contaminated part of the glove being on the inside.

Upon completion of the clean-up job, all PPE shall be cleaned, decontaminated, and sterilized, if necessary, before being properly stored. All disposable PPE as well as the cleaning materials shall be securely packaged and prominently labelled as **Regulated Waste**.

Contaminated materials labelled as **Regulated Waste** cannot be disposed of in plant trash. Contact a member of the HSE team to coordinate proper disposal of this waste.

5.11 Arc Flash Incident – LV/HV Electrical Shock

Arc Flash Incidents and High Voltage (defined as greater than 600 volts) Shock can result in internal burns of deep tissue which may appear normal at the surface of the skin. It is critical that victims be evaluated at the nearest Burn Center. Low Voltage Electrical Shock (less than 600 volts) can be just and deadly and harmful. Any electrical contact should be evaluated by a medical professional.

When working on or around live circuits, be sure to wear the right PPE to protect against electric shock and arc flash. Never wear clothing made from synthetic materials, such as acetate, nylon, polyester, or rayon - alone or combined with cotton. Such clothing is dangerous because it can burn and melt into your skin.


The minimum PPE required would be an untreated natural fiber long-sleeve shirt and long pants with safety glasses with side shields (hazard/risk category 0). Observe Arc Flash labelling for the correct Hazard/Risk Category.

All jewelry shall be removed prior to working on or around live circuits. Metal conducts electricity, and an electrical charge through a ring or metal watch band can be extremely hazardous. Severe burns can result. Safety glasses shall be non-conductive.

If an injured employee is in contact with an energized circuit, **do not touch the victim, shut off the power, and call 911!** If you can't de-energize the circuit, dislodge the victim from the circuit with non-conductive material, i.e. insulated shepherd's hook. If the victim is on fire, smother or douse the flames. Remove smoldering clothing, but not clothing that is melted to the skin.

Tell a conscious victim not to move. There may be other associated injuries besides the burns, such as a neck or spine injury. Moving an injured person can make injuries worse.

Check for respiration and pulse. If the victim is not breathing, rescue breathing from trained personnel should

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2


begin immediately. If a pulse is absent, the victim needs CPR. To be effective, CPR should begin in less than 4 minutes. CPR is 30 compressions for every two breaths.

Run cool, not cold, water over the burn. Do not apply creams, ointments or ice. After the burn has been cooled, cover it with a clean dry cloth. Keep the victim warm. Do not give the victim any food or water.

Always see a doctor following an electrical shock or burn. Even a victim who feels OK may have suffered internal injuries that won't become apparent until later.

5.12 Bomb/Terroristic Threats

The Department of Homeland Security has identified "Energy" as a critical infrastructure for the safety and security of this country. For this reason, all Bomb & Terroristic Threats to any of our facilities requires immediate notification to the FBI Regional Office at (806) 765-8571.

All threats shall be treated seriously by all  personnel. In addition, employees shall adhere to the direction of local law enforcement.

Contact the Site Manager and inform them of the situation. Contact the Asset Manager, Central Operations, and Owner as soon as practical.

If evacuation of the affected building or area becomes necessary, all involved personnel shall proceed to the Assembly Point to receive further instruction from the Site Manager. An order to shelter-in-place may also be given at which personnel shall stay away from windows, lay low, hide, or move to a lockable room or closet.


During the call, obtain as much information as possible from the caller.

Immediately following the call, complete Incident Report form and call NERC at 404-446-9780, and keep track of times and relevant comments.

The Site Manager will contact the Police and Fire Department for Assistance as required (911).

Never attempt to open a suspicious letter or package or tamper with it. It will probably have been designed to withstand postal handling and to detonate during a normal sequence of opening. Contact the local Police for all suspicious letters or packages; this includes any abandoned packages found on site.

Examples of suspicious packages include grease marks showing through on the exterior of the wrapping, emits an unusual odor, rattle, feel springy or emit a ticking noise, have excessive weight for the size and apparent contents.

All threats shall be treated seriously by all  personnel. In addition, employees shall adhere to the direction of local law enforcement.

Contact the Site Manager and inform them of the situation. Contact the Asset Manager, Central Operations, and Owner as soon as practical.

If evacuation of the affected building or area becomes necessary, all involved personnel shall proceed to the Assembly Point to receive further instruction from the Site Manager. An order to shelter-in-place may also be given at which personnel shall stay away from windows, lay low, hide, or move to a lockable room or closet.

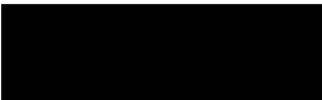
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Examples of suspicious packages include grease marks showing through on the exterior of the wrapping, emits an unusual odor, rattle, feel springy or emit a ticking noise, have excessive weight for the size and apparent contents.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

5.13 Active Shooters

In the event of an active shooter entering  premises, know evacuation routes and be familiar with your surroundings.

Remember to **RUN, HIDE, FIGHT**.

RUN: If you are in a public/open space (lobby) and exiting the building is an immediate and safe option:

Exit the building.

Notify anyone you might encounter to exit the building.

Call 911.

HIDE: If evacuating the building is not an option, shelter-in-place:

Find an area where the active shooter is less likely to find you.

Stay away from windows, glass doors, glass partitions, and any other structures made of glass.

If you are in a room, stay there and secure the door.

If you are in a hallway, get into a room and secure the door.

Stay out of the active shooter's view.

Provide protection if shots are fired in your direction with closed doors and heavy furniture.

Blockade doors with heavy furniture.

Keep quiet.

Silence your cell phone(s).

Stay on the floor and away from windows and doors.

Do not peek out to see what is happening.

Call 911.

FIGHT: As a last resort, consider taking out the shooter if they enter your area:

Act aggressively towards the shooter.

Throw items and makeshift weapons.

Yell.

Commit to your actions.

Reminder: this is a decision only you can make if you are comfortable doing so.

5.14 Business Continuity Plan

Following an EOP event, the Site Manager will connect with all relevant parties to notify that the Emergency situation has ended and the Site has returned to normal operations. Any follow up required activities will be established and followed up as required.

5.15 Critical Infrastructure Protection

Blue Cloud Wind has procedures in place to ensure the plant physical and cyber facilities are protected.


RCP-NERC-CIP-003-ATT-A-R2 - Cyber Security Policy



RCP-NERC-CIP-003-ATT-C-R1 - Physical Security Controls

RCP-NERC-CIP-003-ATT-E-R2 - CSI Response Plan

5.16 Restoration Plan

Following an outage, the Site Manager will enlist an adequate number of employee's and/or contractors to return offline turbines, gathering systems or distribution assets to service.

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Blue Cloud has complete drawings, cut sheets and component manuals to safely make repairs. In addition  manuals and substation repair and operation manuals are available.  back-office engineering support is available as needed.

5.17 Pandemic/Epidemic Plan

In the event of a Pandemic/Epidemic, Blue Cloud Wind will implement the following:

- Sequestering control room staff
- “Locking down” plant control rooms so that only essential staff can enter
- Staggering shifts to reduce number of staff in facilities
- Screening people entering sites for potential infection using questionnaires and temperature tests
- Non-essential staff working from home
- Management staff working on rotation—some in the plant, some at home
- Deep cleanings of control rooms and buildings (such as disinfectant fogging)
- Setting up auxiliary control rooms where staff could work while fogging was performed in the main control room

5.18 Spill Response

Every wind farm has a site-specific Spill Prevention Control & Countermeasures Plan (SPCC) that has been certified by a Professional Engineer (PE).

The SPCC includes a facility description detailing the location, activities, storage quantities and discharge potential for all petroleum products used or stored on site.

Spill Containment is our primary means of Spill Control. All containers of 55-gallons or greater must be stored within a secondary containment structure. This can be accomplished through the use of containment pallets for 55-gallon drum storage.

All secondary containment structures must be inspected on a Monthly basis with inspection records available for review.

All secondary containment structures which are exposed to the elements must be drained after each storm event to fully restore their containment capabilities. This includes the Main Power Transformer sump.

As noted above in Section 5.4 Large Spill Kits are located in every Warehouse building. Small Spill Kits are located in every O&M Vehicle.

All personnel are tasked with stopping spills and containing spills. If a spill kit is not immediately available build an earthen berm to contain the spill. It is a priority to ensure all spills on site are contained and prevented from reaching the nearest body of water.


Spill clean-up and remediation will typically be contracted through a spill response vendor. Small spills may be addressed by site personnel.


All spill response materials used during clean-up activities, as well as any contaminated absorbent or soil must be properly disposed of through the site oily waste recycling vendor (e.g., Safety Kleen).

All spills will be immediately reported to the Site Manager. The Site Manager will then inform the Asset Manager who will determine if there are any external regulatory reporting requirements.

5.19 External Communications


During an emergency all contact with individuals or regulatory agencies external to the site (Media, PUC, local and state governmental) will be the responsibility of the Emergency Management Committee (EMC) or its delegate. Typically, the direct responsibility will be delegated to the Owner who will relay information to the media as required. **(No other employee should talk to the media).**

	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Anyone who gives information to the media without explicit consent from Owner will be subject to disciplinary action by .

Inquiries from non-site personnel should be referred immediately to the EMC for handling.

Names, addresses, and telephone numbers for media contacts in the surrounding area are maintained and updated by the Site Manager. All notifications to the various media organizations will be handled by Owner unless otherwise directed.

During an emergency all requests for information will be referred to the EMC. Other  personnel are not to respond to any requests for information even if receiving and working to resolve such requests are a normal function of his/her job.

Employees who receive a request for information should respond:

"We are operating under emergency conditions. May I have your name and a contact number? I will have someone from our Emergency Management Committee contact you. Thank you."

5.20 Annual Exercise Requirements

Fire Evacuation Drills are held at least annually at every site and shall be critiqued and documented. Prior to holding a Fire Evacuation Drill where the alarm is to be given, all site OEM Management personnel will be notified. The wind farm Site Manager (or their designee) will serve as the Fire Drill Warden for evacuation exercises of the O&M/Warehouse building. They will be the last person out of the building, first making sure all interior doors are shut and the restrooms are clear, prior to going to the Assembly Area. Every wind farm Site Manager will annually sponsor an Emergency Exercise and invite relevant local first responders to participate.

Annual Exercises may include "table-top" exercises to review emergency procedures with relevant personnel or "practical" exercises which occur in the field and simulate emergency events with first responders.

Example scenarios for annual exercises include severe weather events, medical emergencies, fire emergencies, tower/confined space rescues, helicopter service drills, major spill events, arc flash events, and terroristic threats/criminal trespassing.


An EOP drill will be conducted once per calendar followed by an evaluation of its emergency response. Revisions will follow if required. Commission staff will be notified of the date, time, and location of the drill at least 30 days in advance of the drill using the method and form prescribed by commission staff of the commission's website, and the appropriate TDEM District Coordinators unless EOP was activated in the calendar year.



6 References

- FEMA Are You Ready? An In-depth Guide to Citizen Preparedness (http://www.fema.gov/pdf/areyouready/areyouready_full.pdf)
- OSHA 1910.38 Employee Emergency Action Plans
- U.S. Department of Homeland Security Active Shooter: How to Respond (http://www.dhs.gov/xlibrary/assets/active_shooter_booklet.pdf)
- Blue Cloud Wind Energy, LLC. Spill Prevention, Control, and Countermeasure (spcc) Plan

7 Revision Control

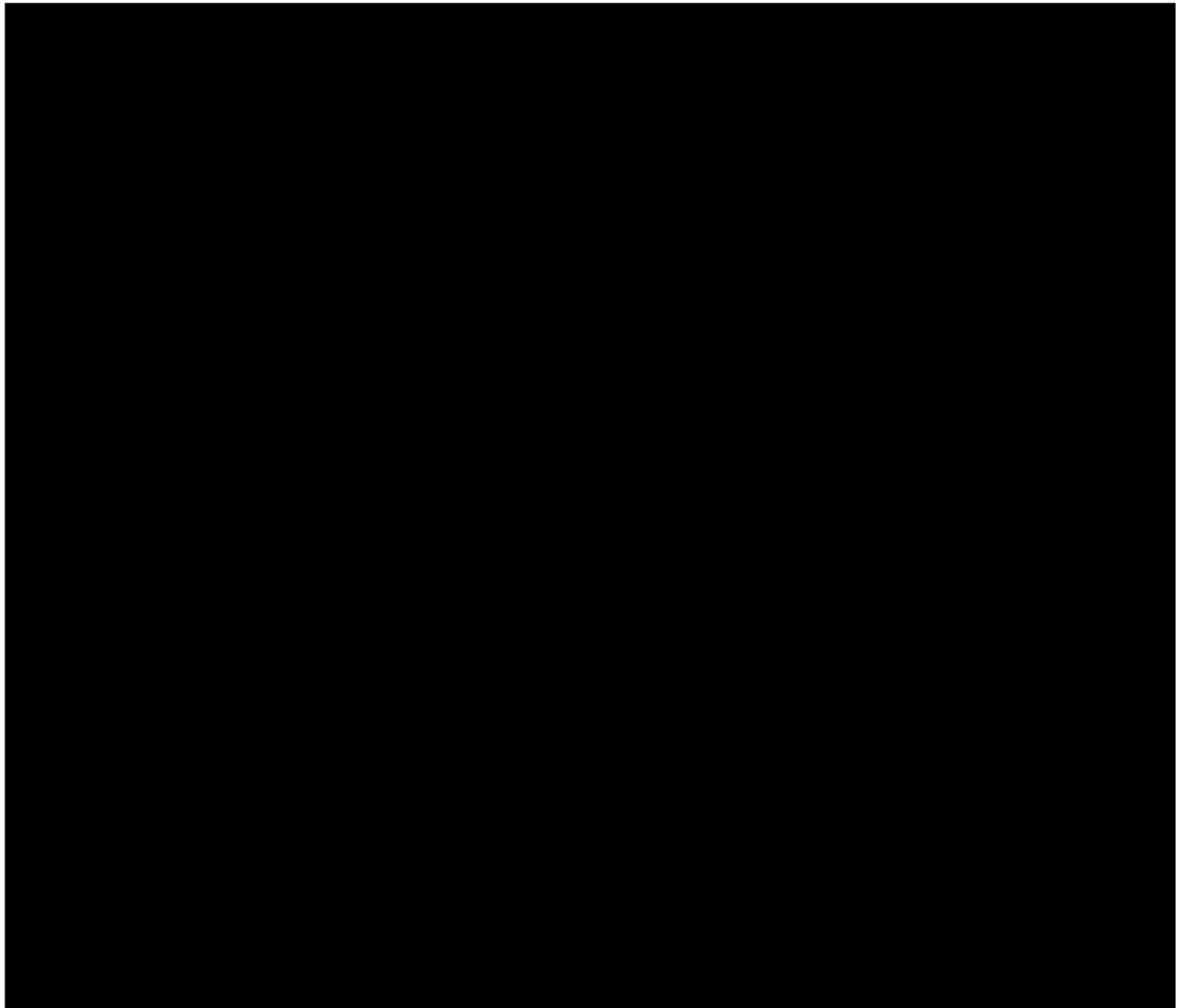
Revision summary listed below. The current revision represents the most recently approved version. It is noted that the current revision supersedes all previous versions.


	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Revision Control			
Date	Approved by	Revision Number	Change Notes
12/20/2018		1	Initial Issue
4/15/2022		2	Updated per PUC 25.53

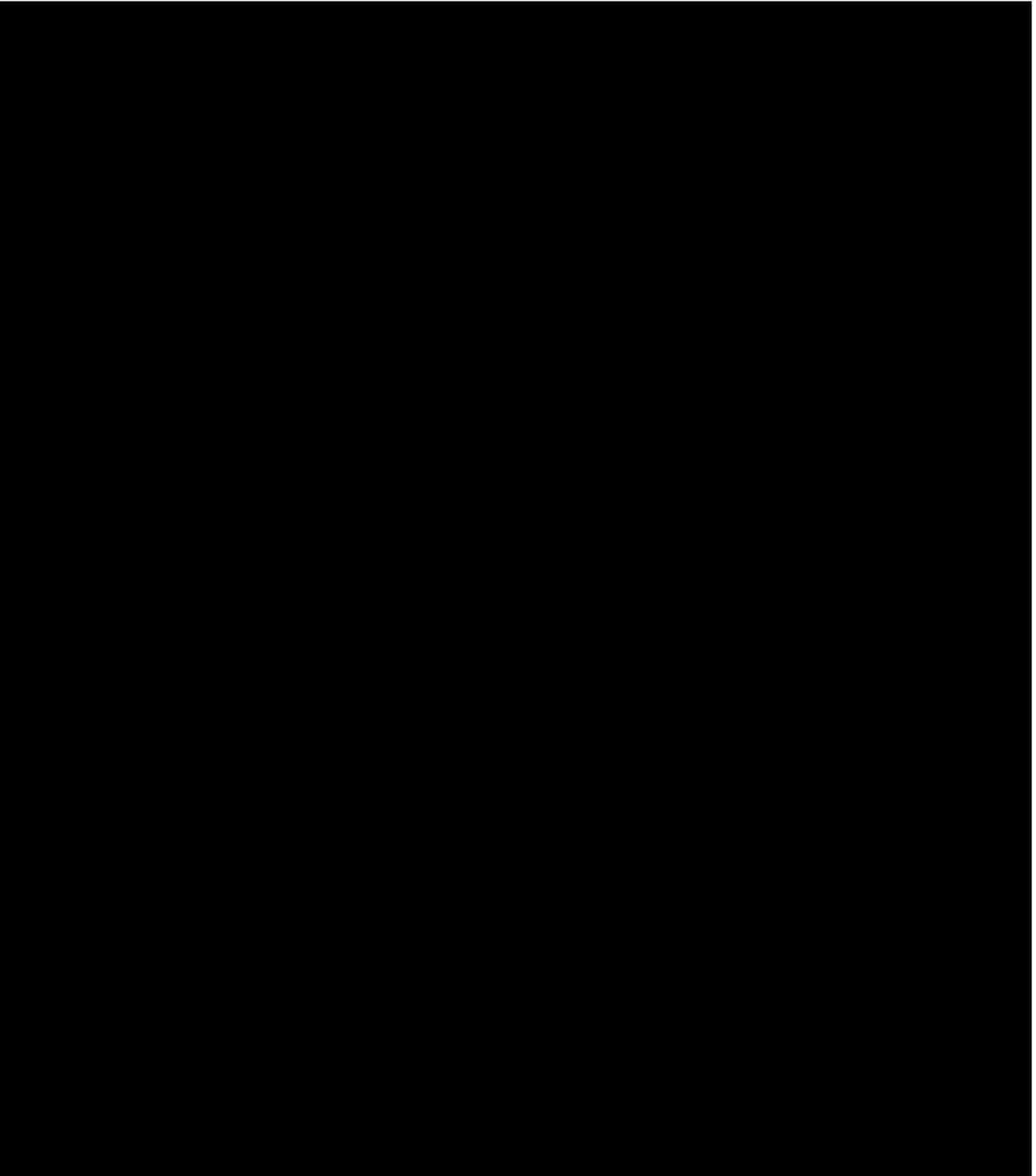
This Emergency Operations Plan will be updated no later than March 23, 2023.


Appendix A: Site Map

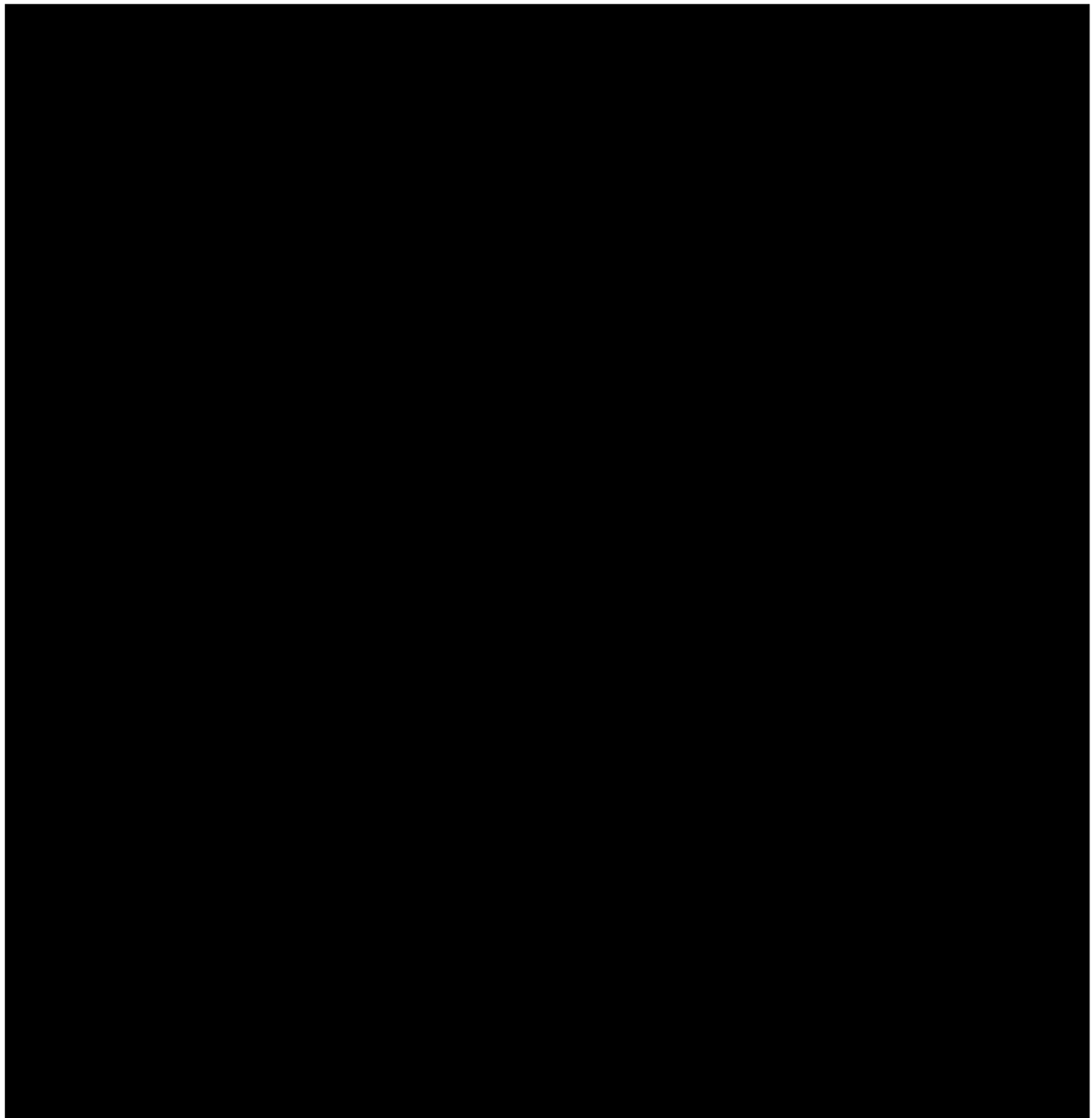



	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Appendix B: Emergency Contact Lists



	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

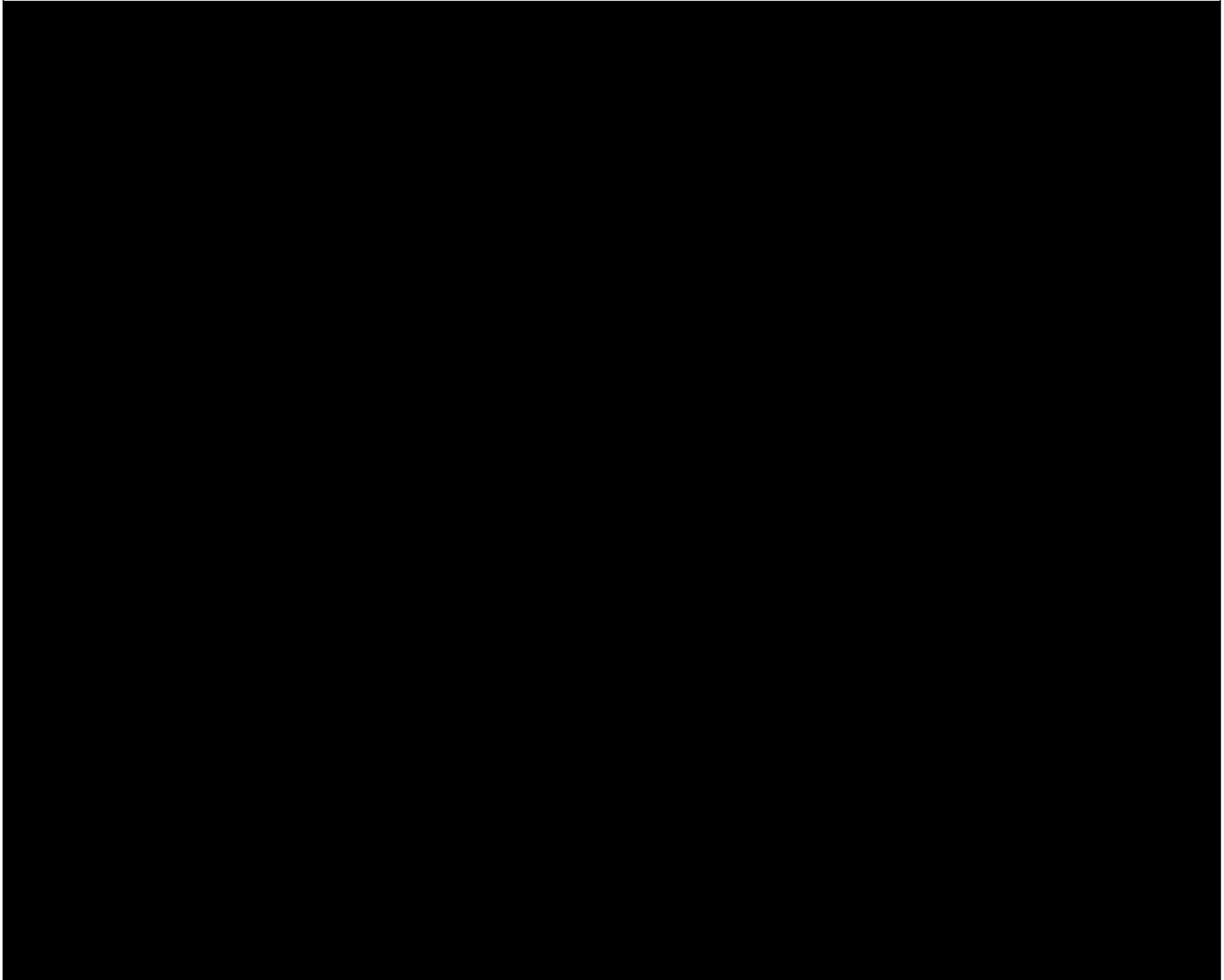



	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Appendix C: 911 Emergency Address and GPS Information







	Blue Cloud Wind Energy LLC Site Specific Emergency Operations Plan	Number:	BC-OMP-HSE-ERP
		Issued:	4/15/2022
		Revision	2

Appendix D: Site Emergency Supplies

The following site safety supplies are maintained at the site with checks done on a quarterly basis at a minimum.

- 1, NOAA Weather Radio, 1, EA
- 2, Spare Radion Batteries, 1, Carton
- 3, Water (Disposable bottles), 3, Cases
- 4, Cell Phone Charger (With Battery), 2, EA
- 5, Flashlight, 2, EA
- 6, Spare Flash Light Batteries, 1, Carton
- 7, Canned Food, Dried Food and Energy Bars, 2, Cartons
- 8, Space Blankets, 5, EA
- 9, Moist towelettes, Garbage Bags 1 , 1, Carton

*CONFIDENTIAL***PROJECT NO. 48808****BLUE CLOUD EMERGENCY OPERATIONS PLAN AFFADAVIT**

Blue Cloud Wind Energy LLC (“Blue Cloud”), a registered power generating company submits affidavit and emergency operations plan summary in compliance with PUC Substantive Rule § 25.53, Electric Service Emergency Operations Plans. Blue Cloud’s registration as a power generating company was approved on November 6, 2018.

BLUE CLOUD HEREBY PROVIDES NOTICE THAT IT IS PROVIDING CONFIDENTIAL INFORMATION IN CONNECTION WITH THE FILING OF THIS EMERGENCY OPERATIONS PLAN SUMMARY.

I. INTRODUCTION

Blue Cloud is a wind powered generation facility (“Facility”) located in Lamb and Bailey County, approximately 50 miles northwest of the city of Lubbock, TX. The Facility is comprised of 43 wind turbines rated at 3.45 MW each, with the total capacity of the Facility equaling 148.35 MW.

This emergency operations plan summary includes a brief description of the procedures and actions described in the Blue Cloud Emergency Operations Plan (“Emergency Operations Plan”). The Emergency Operations Plan contains the specific emergency procedures to be followed by Blue Cloud personnel. A copy of the Emergency Operations Plan is made available to each Blue Cloud employee, with additional copies posted at various points in the Facility. A complete copy of the emergency operations plan is available at the Facility¹ for inspection by the commission or commission staff upon request.

II. EMERGENCY OPERATIONS PLAN SUMMARY

The content and policies of Emergency Operations Plan are summarized below.

25.53 Subchapter C, d (1) (A) EOP Introduction – Section 1, Page 4

25.53 Subchapter C, d (1) (B) Responsible Individuals – 3.1, 3.2, Pages 4-5

25.53 Subchapter C, d (1) (C) Revision Summary – Section 7, Page 19

25.53 Subchapter C, d (1) (D) Version Supersedes - Section 7, Page 19

25.53 Subchapter C, d (1) (E) EOP Approved – Section 7, Page 19

25.53 Subchapter C, d (2) (A) Communication Plan for Distribution Services – N/A

¹ The Facility address is 1901 County Road 227, Sudan, TX 79371

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25.53 Subchapter C, d (2) (B) Emergency Communications – Section 5.19, Page 18
 25.53 Subchapter C, d (3) Supplies – Section 5.3, Page 7
 25.53 Subchapter C, d (4) Staffing During Emergency – Section 3.1, Page 4
 25.53 Subchapter C, d (5) Identification of Weather Hazards- Section 5.6, Pages 8-14
 25.53 Subchapter C, d (6) -Subsection E Annex Inclusion – N/A

25.53 C, (2) A Weather Emergency Annex that includes:

- (i) Operational Plans – Section 5.8-5.13, Pages 14-17
- (ii) Verification of fuel switching equipment, - N/A
- (iii) Check list for personnel - Section 5.8 Page 14

25.53 Subchapter C, (2) B Water Shortage Annex – N/A

25.53 Subchapter C, (2) C Restoration of Service Annex – Section 5.14, Page 17

25.53 Subchapter C, (2) D Pandemic and Epidemic – Section 5.17, Pages 17-18

25.53 Subchapter C, (2) E Hurricane Annex - Section 5.6, Pages 10

25.53 Subchapter C, (2) F Cyber Security Annex – Section 5.15, Page 17

25.53 Subchapter C, (2) G Physical Security Incident Annex – Section 5.15, Page 17

(A) Power Plant Weatherization

As a wind powered generation facility located in the western portion of Texas, Blue Cloud primarily faces four types of weather-related issues: tornado, high winds, hail and lightning. The Emergency Operations Plan includes specific provisions for Facility personnel to follow under each of these weather-related events. The Emergency Operations Plan includes, but is not limited to, procedures and instructions for monitoring and recognizing serious weather conditions, and instructions on how to respond to a severe weather event to protect personnel, property and equipment.

(B) Alternative Fuel and Storage Capacity

As a wind powered generation facility, Blue Cloud has no alternative fuel capabilities.

(C) Priorities for Recovery of Generation Capacity

The priorities for recovery of Blue Cloud generation will vary depending on the type and severity of the initiating event and in all cases will be coordinated with the Electric Reliability Council of Texas (“ERCOT”). Recovery priorities are dependent on numerous factors, such as system demand, transmission status, and ERCOT’s assessment of overall electric grid condition. All generation activities for Blue Cloud, whether for routine operations or under a capacity recovery scenario, are coordinated through Blue Cloud’s Energy Manager (“EM”), which is staffed 24 hours per day and in communication with ERCOT as conditions warrant.

(D) Pandemic Preparedness Plan

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Blue Cloud's Site Manager, in his role as the Emergency Planning Coordinator, will coordinate Blue Cloud's Emergency Operations upon declaration of a pandemic threat from state or county health officials.² Among the pandemic responses available and coordinated by the Site Manager shall be social distancing to the greatest extent possible, immediate employee communications, and implementation of infection prevention methodologies to limit the impact on Blue Cloud operations.

(E) Hurricane Plan

Blue Cloud is not in a hurricane evacuation zone, therefore the Emergency Operations Plan contains no specific provisions for hurricanes. Weather related events common to the geographic area of Blue Cloud were discussed above in Section II (A).

(F) Drills

As a power generating company, Blue Cloud shall participate as required in any ERCOT coordinated annual severe weather drills. These drills shall be coordinated by Facility personnel with the Blue Cloud QSE. Any lessons learned from these drills shall be incorporated into Blue Cloud's Emergency Operations Plan.

III. Plan Review

(A) Distribution List

As per 25.53 Subchapter C (4)(A), the following individuals at a minimum have received access to the Emergency Operations Plan.

Distribution List for Emergency Operations Plan		
Title	Name	Company
Henrik Tortrup	President	Blue Cloud Wind Energy LLC
Sean Toland	Secretary	Blue Cloud Wind Energy LLC
Christopher Glimco	Commercial Director	Copenhagen Infrastructure Service Co.
Reilly Cleal	Commercial Manager	Copenhagen Infrastructure Service Co.
Thomas Vakalikos	Senior Commercial Manager	Copenhagen Infrastructure Service Co.
Denis Anderson	Head of Asset Management	Peak Wind SaS
Josh Forsyth	Head of Central Operations	Peak Wind SaS
Regina Sweet	Portfolio Asset Manager	Peak Wind US, Inc.
Scott McBride	Site Manager	Peak Wind US, Inc.

² The responsible persons for various emergency response tasks are fully described in the Emergency Operations Plan.

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As per 25.53 Subchapter C (4)(A), the following training calendar and attendees are listed below.

Training Summary					
Personnel	Emergency Operations Plan	IS-100	IS-200	IS-700	IS-800
Scott McBride	X	X	X	X	X

(C) Review

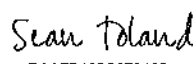
As per 25.53 Subchapter C (4)(C), I attest that:

- The Emergency Operations Plan was reviewed and approved by an Officer of the Company with binding authority;
- And the relevant personnel have completed or will have completed the following required training within 60 days of filing;
- A Business Continuity Plan addressing return to normal activities is included in the Emergency Operations Plan.
- 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;
- An annual drill of the EOP has been conducted;

III. CONCLUSION

The summary information provided herein describes just a few of the procedures and processes Blue Cloud follows in the event of an emergency. A complete copy of the emergency operations plan is submitted along with this affidavit. Also included and attached to this summary is Blue Cloud's emergency contact information and a signed attestation from an officer of the company with binding authority.

Respectfully submitted,

DocuSigned by:

DAAFB132C879462...

Sean Toland
Secretary
Blue Cloud Wind Energy LLC

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PUC Emergency Contact Form

Please type or print legibly. The EMERGENCY contact is the person(s) the PUC can contact for information about outages, damages, repair timelines, deaths or injuries, etc. during local or statewide emergencies.

Return form to: Sandra Hamlett, Electric Division

Public Utility Commission of Texas

PO Box 13326

Austin, Texas 78711-3226

Fax: 512-936-7361

Email: sandra.hamlett@puc.state.tx.us

TYPE OF SERVICE PROVIDER (Please check one box)

☒ **Power Generator**

☐ **Self Generator**

☐ **Retail Electric Provider**

☐ **Power Marketer**

Name of Service Provider: Blue Cloud Wind Energy LLC

Mailing Address: 1901 County Road 227 City: Sudan State: TX Zip: 79371

Street Address: 1901 County Road 227 City: Sudan State: TX Zip: 79371

Telephone Number: (325) 862-0222 Fax Number: (325) 862.0228

Counties Served: N/A

Emergency Information

Primary Contact	Secondary Contact
Name: Scott McBride	Name: Regina Sweet
Work Phone: <u>(774) 563-5056</u>	Work Phone: <u>(210) 850-4807</u>
Home Phone/Personal Cell: (806) 782-3529	Home Phone/Personal Cell: <u>(713) 248-8669</u>
Email: msm@peak-wind.com	Email: rsw@peak-wind.com