



Filing Receipt

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ATTESTATION OF ANNUAL REVIEW

This EOP has been reviewed by the Sweeny Cogeneration LLC Management. And the following changes were made:

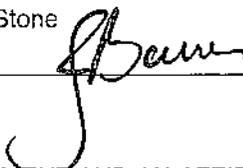
- After reviewing the EOP procedure "Sweeny Refinery Control and IT Systems Business Recovery Plan" was added to Section 10.1.7 Restoration Annex 7.
- Updated Table 1 Emergency Operations Plan Distribution Listing
- Updated Table 3 Emergency Operation Plan Contact Listing

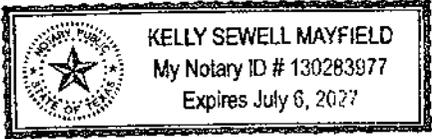
Please find attached revised procedure.

I, Bill Stone, attest that the above statements are true to the best of my knowledge.

Title: Vice President of Sweeny Cogeneration LLC

Name: Bill Stone

Signature: 



THIS DOCUMENT AND AN AFFIDAVIT MUST BE FILED WITH THE PUCT BY MARCH 15 OF EACH YEAR COMMENCING IN 2023.

NOTE: An Affidavit is also required to be submitted to the PUCT.

Baron, Jim T

From: Stone, Bill L
Sent: Friday, March 8, 2024 10:17 AM
To: Baron, Jim T; Newland, David M.; Niemann, Amy E.; Oliver, Kirk E; Permenter, Jennifer; Saiz, Michael; Walczak, Brett; Way, Benjamin
Cc: Permenter, Jennifer; Follett, Jessica E
Subject: Delegation of Authority 3/11/24 - 3/15/24

I will be out of the office and away from the area 3/11/24 -3/15/24 (two days at the AFPM and the rest vacation). During this timeframe Jim Baron will act as my alternate in approving various types of transactions, excluding personnel matters, in accordance with the General Authority Limitations and other stated delegations for the Human Resources Manager, and will seek higher executive approval and advice when needed.

I will be available on my cell and email.

Cheers,

Bill

Emergency Operations Plan

Sweeny Cogeneration LLC (RE)

Emergency Operations Plan

Revision 2

Effective Date: 03/15/2024

Prepared by: Ivan Villarreal

Date: March 11, 2024

Approved by: Bill Stone

Date: March 15, 2024

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Emergency Operations Plan**1.0 Executive Summary****1.1 General**

- 1.1.1 The Phillips 66 Sweeny Cogeneration facility (Sweeny Cogen) is a simple-cycle power plant located entirely in Brazoria County, approximately 2.3 air miles northwest of the town of Sweeny, Texas, within the Sweeny Complex. The Sweeny Complex consists of several facilities owned and operated by Phillips 66 (P66) and Chevron Phillips Chemical Company Limited Partnership (CPChem) located in southern Brazoria County, Texas. These assets are linked by multiple pipelines and operate as a single petrochemical complex. Sweeny Cogen operates four gas turbine / heat recovery steam generators and provides steam and electricity for the operation of the Sweeny Complex, exporting any surplus electricity to the Bulk Electrical System grid via interconnects with Texas New Mexico Power and CenterPoint Energy. Sweeny Cogeneration LLC (RE) does not operate any gas or water production/storage/treatment assets. All required, finished products (fuel gas, process water, potable water) necessary for the operation of Sweeny Cogen are acquired via pipelines from the Sweeny Complex therefore operability of Sweeny Cogen is dependent on the status of the Sweeny Complex.
- 1.1.2 This Emergency Operations Plan (EOP) outlines how Sweeny Cogen complies with and implements the requirements of the Public Utilities Commission of Texas (PUCT) TAC §25.53. The EOP is a descriptive document that outlines Sweeny Cogen's many emergency and incident response policies and procedures. As an integrated asset within the Sweeny Complex, Sweeny Cogen's EOP utilizes the Sweeny Complex Integrated Contingency Plan (ICP) for incidents requiring emergency response such as fires, spills, hazardous waste releases, gas releases, explosions, utility failures, injuries, medical conditions, confined space/high angle rescues, severe weather, bomb threats, or other physical security issues.
- 1.1.3 The ICP, which utilizes the standard plan format recommended by the National Response Team's Guidance Document on Integrated Contingency Planning as published in the Federal Register, 61 FR 2 8641, was developed to provide emergency response procedures for the entire Sweeny Complex. The ICP was designed to consolidate emergency planning requirements mandated by Texas Administrative Code and the Code of Federal Regulations. The Incident Management Section of the ICP is based on the National Incident Management System (NIMS).
- 1.1.4 Senior Management is ultimately responsible for approval, implementation, and activation of the Sweeny Complex ICP and this EOP. An affidavit containing an attestation by the Senior Vice President is included with this filing. Future revisions to the EOP will be accompanied by an additional affidavit.

Emergency Operations Plan

- 1.1.5 This plan prescribes emergency response procedures for Sweeny Cogen in accordance with the Sweeny Complex ICP, while it reflects the structure of emergency operating procedures detailed in the PUCT's TAC §25.53.
- 1.1.6 This plan serves as an emergency management link between Sweeny Cogen, the other facilities within the Sweeny Complex, local municipalities and state government while incorporating the PUCT, TDEM (Texas Division of Emergency Management) and federal (FEMA, etc.) organizational concepts of emergency operations planning.
- 1.1.7 Sweeny Cogen's EOP employs a functional, all-hazards approach that manages Sweeny Cogen's needs by incorporating seven (7) Annexes. This functional approach is basically the same at the local, state, and federal levels. Sweeny Cogen distributes the plan by providing specific instruction to key personnel coupled with providing access to other supportive personnel. This distribution is documented within Sweeny Cogen's site process for providing information and training to its staff. A record of this distribution is included as Table 1 to this EOP.
- 1.2 Organization
- 1.2.1 The plan (EOP) is divided into supporting annexes, all are developed, approved, and maintained separately. Each annex refers to several implementing procedures/processes. This allows the specific annexes to contain the appropriate level of detail, organizational review and implementation guidance needed to ensure a more effective response. Annexes are a listing of Supporting Plans that:
- 1.2.1.1 support this EOP for assignment of responsibilities and operational principles that implement this plan during specific emergencies,
 - 1.2.1.2 because of regulatory requirements or the specific nature of the hazards they address, best stand alone,
 - 1.2.1.3 are published separately, and incorporated into this plan by reference,
 - 1.2.1.4 annexes provide additional information (definitions, explanation of terms, maps, etc.) which will be helpful during emergency response.
- 1.3 Requirements Matrix
- 1.3.1 Each Annex included within the Sweeny Cogen EOP has referred to PUCT requirements and associated Sweeny Cogen procedure sections and/or page numbers have been captured in a composite cross-reference included as Enclosure 3 to this EOP.

Emergency Operations Plan**2.0 Purpose and Scope**

- 2.1 Purpose: This plan is to outline those activities to be taken by Sweeny Cogeneration LLC (RE) to manage and coordinate emergency response activities specific to Sweeny Cogen and to interface when required with the private sector, State of Texas Division of Emergency Management (TDEM), PUCT, ERCOT, and Federal government agencies (FEMA, etc.) in the event of a natural or human-caused event or disaster. This plan serves to satisfy the requirements of the PUCT TAC §25.53. This plan is designed as an "All-Hazards" plan. Its organization into Emergency Operations Plan Annexes allows it to be used for several potential disasters and emergencies.
- 2.2 Scope: The plan will apply to all emergencies that require Sweeny Cogen response. The plan is to be applied to all personnel and assets of Sweeny Cogeneration LLC (RE) and supporting emergency response organizations.

3.0 Definitions

- 3.1 Annex – a section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
- 3.2 Drill – An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
- 3.3 Emergency – A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
- 3.4 EOP – Emergency Operations Plan (PUCT required plan per TAC §25.53)
- 3.5 Hazard – A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
- 3.6 TDEM – Texas Division of Emergency Management
- 3.7 Threat – the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

4.0 Plan Development, Maintenance and Distribution

- 4.1 Sweeny Cogen's EOP is developed and maintained consistent with the organization's procedure development processes. The Original and all subsequent revisions to the EOP will be maintained within the Sweeny Complex ICP document control process.
- 4.2 The Sweeny Cogen EOP is reviewed and approved by the onsite Senior Management, including Vice Presidents of Sweeny Cogeneration LLC.
- 4.3 Maintenance and implementation are the responsibility of the Senior Management.

Emergency Operations Plan

- 4.4 Revisions to the Sweeny Cogen EOP are to be approved by the Senior Management (Same as approval).
- 4.5 The EOP contains an "Approval and Summary of Changes" where the approval accompanied by the date are recorded. This summary page will list all versions of the EOP and will clearly indicate that the most recent version supersedes all others.
- 4.6 A typical EOP Approval and Summary of Changes page is included as Table 2 to the EOP.
- 4.7 The EOP is distributed via familiarization training and access provision as detailed in Section 5.0 of this EOP.

5.0 Access/Training and Drills

- 5.1 Sweeny Complex emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events receive training that is believed to be equivalent to the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. This includes both technical staff and communications personnel as appropriate to the position.
- 5.2 Training of Emergency Response Organization personnel is part of a rigorous training program. For Emergency Planning, designated personnel are frequently trained in incident management systems. Additionally, appropriate staff meet during training with external media and others.
- 5.3 Sweeny Cogen provides key operating personnel with familiarization training on this EOP and provides access to the EOP to other supportive personnel. Key personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate because of specific circumstances during an emergency.
- 5.4 Training activities are documented within the Phillips 66 Sweeny Refinery's training records process. An example of the information captured is provided as Table I, "Emergency Operation Plan Distribution Listing" contained within this EOP.
- 5.5 Sweeny Cogen may conduct multiple tables tops and drills in any given year. Sweeny Cogen will ensure that it conducts at least one drill each calendar year to test its EOP or portions thereof.
- 5.6 Sweeny Cogen prior to conducting an annual drill will, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill.
- 5.7 The Sweeny Complex conducts periodic hurricane drills/table-tops (or actual hurricane response); at least one of these will be documented to meet the annual drill requirement for Sweeny Cogen.
- 5.8 Following any drill, Sweeny Cogen will capture lessons learned to assess the effectiveness of its emergency response and revise its EOP and supporting processes as needed.

Emergency Operations Plan**6.0 Staffing**

- 6.1 Sweeny Cogen provides continuous (24 hour/day) operation. Key functions will be maintained throughout an emergency by providing relief of the on-shift personnel and augmenting positions by qualified individuals. The shift rotations may be adjusted during an emergency as dictated by Senior Management.
- 6.2 Sweeny Cogen's on-shift staffing can perform the actions required by Emergency Operating Procedures (EOP) and those required by the Emergency Plan, without task overlap or overburden.
- 6.3 In weather related events such as a hurricane, storm crew personnel are activated.

7.0 Communications

- 7.1 Phillips 66 Communications and Public Affairs Personnel maintain plans and processes regarding the coordination of information with other organizations and the methods and means by which it is released to the media and the public as outlined in the Integrated Contingency Plan.
- 7.2 Sweeny Cogen has identified specific personnel and their contact information to immediately address urgent requests and questions from the PUCT if needed. This listing is included as Table 3 to this EOP.
- 7.3 Phillips 66 Sweeny Refinery operations supervision and the designated QSE communicate periodically with the Balancing Authority and Reliability Coordinator (RC) during normal operations and those communications essential to continued operation are expected to continue during an emergency as needed. Coordination with Phillips 66 Communications and Public Affairs Personnel is also expected to occur.

8.0 Concept of Operations

- 8.1 The concepts address both common operational functions that are relevant across emergency types and annexes that outline the response to specific types of emergencies. It is expected that the appropriate portions of this EOP be implemented when a situation or condition is recognized.
- 8.2 The Sweeny Cogen concept of operations and overall expectations for event response are as follows:
 - 8.2.1 Recognize and classify the event or emergency:
 - 8.2.1.1 The Integrated Contingency Plan outlines the workflow to classify an event or emergency.
 - 8.2.1.2 The Sweeny Complex utilizes a paid weather monitoring service, StormGeo, for detailed weather forecasts.
 - 8.2.2 Review this EOP's annexes to augment or direct actions as appropriate.

Emergency Operations Plan

- 8.2.2.1 The Integrated Contingency Plan provides guidance on external communications appropriate for the specific emergency.
- 8.2.2.2 For weather-related hazards, Sweeny Cogen will invoke Annex 1, "Weather Emergency", Annex 2, "Hurricane", or Annex 3, "Water Shortage" to this EOP (as applicable).
- 8.2.3 Notify appropriate Sweeny Complex personnel and offsite authorities.
- 8.2.4 Request additional support from County, State, Federal and private organizations (as needed).
- 8.2.5 Establish and maintain effective communications with onsite and offsite (local, state, TDEM, PUCT, ERCOT, QSE, FEMA, etc.) entities.
- 8.2.6 Continuously assess the consequences of the event or emergency, and periodically communicate response status and assessment information to the appropriate groups and authorities.
- 8.2.7 Take actions onsite and communicate any actions to offsite authorities as defined by the Integrated Contingency Plan.
- 8.2.8 In conjunction with State and County officials, provide information to the public.
- 8.2.9 Inform Phillips 66 Executive Leadership of the situation at the site.
- 8.2.10 Emergency contacts will respond to requests from TDEM, PUCT, ERCOT, OPUC and other regulators or government officials.
- 8.2.11 Upon request of PUCT Staff during an activation of the State Operations Center by TDEM, Sweeny Cogen Emergency Contacts will provide updates on status of operations, outages, and restoration efforts as applicable.
 - 8.2.11.1 These updates may continue until all incident related outages of customers able to take service are restored or unless notified by PUCT Staff.
 - 8.2.11.2 PUCT Staff may require after action or lessons learned reporting by a date specified by the commission.
- 8.3 Depending on the situation, Sweeny Cogen will invoke the appropriate Annex/es to the EOP to govern response activities specific to the event at hand.
- 8.4 The Sweeny Complex has made provisions for necessary emergency response supplies and conducts appropriate inventories and functional checks. Only key supplies are maintained as pre-identified and thereby inventoried and controlled. Hurricanes and declared emergencies are the drivers of these equipment and supply listing (specifics included in appropriate Annex).

Emergency Operations Plan**9.0 EOP Filing requirements**

9.1 Sweeny Cogen must file an executive summary that:

9.1.1 describes the contents and policies contained in the EOP,

9.1.2 includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule,

9.1.3 includes the record of distribution, and is

9.1.4 submitted by affidavit¹.

9.2 Sweeny Cogen must file a complete copy² to ERCOT³ and a redacted copy to PUCT⁴.

9.2.1 The initial filing must be completed no later than April 18, 2022.⁵

9.3 Beginning in 2023, Sweeny Cogen must annually update information included in the EOP no later than March 15.

9.3.1 For a change that materially effects how Sweeny Cogen would respond to an emergency, Sweeny Cogen must:

9.3.1.1 file an executive summary that:

a. describes the changes to the contents or policies contained in the EOP,

b. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule,

c. includes the record of distribution, and

d. is submitted under affidavit.

9.3.1.2 file with the commission a complete, revised copy of the EOP with all confidential portions removed, and

9.3.1.3 submit to ERCOT its revised unredacted EOP in its entirety.

9.3.2 If no changes were made to the EOP that materially affects Sweeny Cogen's emergency response, Sweeny Cogen must:

¹ Contents of the affidavit is detailed in PUCT TAC §25.53 (c)(4)(C).

² Contents of the EOP is detailed in PUCT TAC §25.53 (c)

³ ERCOT will protect the unredacted filing as Protected Information per ERCOT Protocols.

⁴ PUCT must be provided with an unredacted copy of the EOP upon request.

⁵ Contents of the EOP is detailed in PUCT TAC §25.53 (c)

Emergency Operations Plan

- 9.3.2.1 Document any changes made to the list of emergency contacts,
 - 9.3.2.2 provide an attestation from an officer stating that no change to the EOP that materially affects Sweeny Cogen's emergency response had been made, and
 - 9.3.2.3 submit an affidavit documenting the submittal.
- 9.3.3 Sweeny Cogen will update its EOP if requested by the PUCT.

10.0 Annexes

10.1 Sweeny Cogen has included seven annexes within this EOP. The annexes are to be used to address each specific event or emergency type or classification. The annexes are made up of documents, each with specific implementation requirements, responsibilities, and review and approvals. Additionally, this EOP includes a Sweeny Cogen PUCT Requirements Matrix that can be used to link procedures to specific PUCT requirements. The seven annexes are:

- 10.1.1 Weather Emergency
- 10.1.2 Hurricane
- 10.1.3 Water Shortage
- 10.1.4 Pandemic/Epidemic
- 10.1.5 Cyber Security
- 10.1.6 Physical Security
- 10.1.7 Restoration

Emergency Operations Plan

ANNEX 1

WEATHER EMERGENCY

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	SW-COGEN-EOP-GEN02 – Cogen Freeze Protection Actions, Pages: Whole Document	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	Cogen Freeze Rounds Logsheets, Pages: Whole Document	Weather Emergency annex

Emergency Operations Plan

(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	Severe Weather, Pages: ICP Annex XIII pages 144-145	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document	Weather Emergency annex

Emergency Operations Plan

ANNEX 2
HURRICANE

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Emergency Response Plan - Hurricane Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Plan Core Plan, Pages: ICP Annex XV pages 147-156	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Preparation List, Pages: ICP Annex XVI pages 157-158	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Personal Hurricane Plan, Pages: ICP Annex XVIII pages 159-160	Hurricane annex

Emergency Operations Plan

ANNEX 3

WATER SHORTAGE

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	SWE-RWT-NOP-SBR01 Raw Water Inventory Management Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Water shortage annex

Emergency Operations Plan

ANNEX 4

PANDEMIC/EPIDEMIC

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	Sweeny Refinery Pandemic Plan (2020) V4 (PRIVATE & CONFIDENTIAL), pages: Whole Document	Pandemic and epidemic annex

Emergency Operations Plan

ANNEX 5
CYBER SECURITY

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	O-33-BP-01 Industrial Control Systems Cyber Security Incident Response Process, Pages: Whole Document	Cyber security annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document	Cyber security annex

Emergency Operations Plan

ANNEX 6

PHYSICAL SECURITY

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	Bomb Threat Procedure, Pages: ICP Annex IV pages 100-107	Physical security incident annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	Prevention, Pages: ICP Annex IX page 137	Physical security incident annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document	Physical security incident annex

Emergency Operations Plan

ANNEX 7
RESTORATION

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Core Plan Establish Objectives & Priorities, Pages: ICP pages 52-54	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Debrief & Critique Guidelines, Pages: ICP Annex I pages 90-92	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Power Restoration Priority List, Pages: Hurricane Plan Attachment 10.019	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Startup Sequence, Pages: Hurricane Plan Attachment 10.020	A restoration of service annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Sweeny Refinery Control and IT Systems Business Recovery Plan	A restoration of service annex

Emergency Operations Plan

TABLE 1

EMERGENCY OPERATION PLAN DISTRIBUTION LISTING

Emergency Operation Plan Distribution Listing

	Title	Name	OPERATING PERSONNEL ⁶ (YES/NO)	Date Access Provided	Date Trained
1	General Manager	Bill Stone	NO	3/12/24	
2	HSE Manager	Ben Way	NO	4/18/22	
3	Emergency Response Team Leader	Ronnie Thompson	NO	4/18/22	
4	Operations Manager	Jim Baron	NO	10/1/22	
5	Production Superintendent	Steve Miller	NO	4/18/22	
6	Shift Superintendents (601s)	Kurt Hankins Dan Turbett Nick Aparicio Max Howell	NO	4/18/22	
7	Business Team Leader	Brett Howard	NO	1/16/23	
8	Utilities Operations Supervisor	Ivan Villarreal	NO	4/18/22	
9	Utilities Shift Leaders	Brett Boenisch Joe Trevino Jon Wilhelm Phillip Robles	YES	4/18/22	4/18/22
10	Cogen Console Operators	Mike Luera Thanh Nguyen Gary White Chris Goodson Will Sanders Max Carrion Clayton Arlitt	YES	4/18/22	4/18/22

⁶ Operating personnel should be familiar with and have received training on applicable contents of the EOP and instructed to follow applicable portions except to the extent deviations are appropriate because of specific circumstances during an emergency.

TABLE 2
APPROVAL AND SUMMARY OF CHANGES

CHANGE NUMBER	PREPARED BY	DATE OF CHANGE	SUMMARY OF CHANGE	APPROVAL SIGNATURE ⁷	DATE APPROVED
0	Gavin Myers	4/14/22	Initial Plan to meet revised PUCT TAC §25.53	Per Filing Affidavit	4/18/22
1	Gavin Myers	3/14/23	Revised EOP Distribution Listing and EOP Contact Listing		3/15/23
2	Ivan Villarreal	3/11/2024	Revised EOP Distribution Listing and EOP Contact Listing Added "Sweeny Refinery Control and IT Systems Business Recovery Plan" to Annex 7 Restoration		3/15/24

⁷ *This Signature Constitutes Approval and attests that this change supersedes previous versions of the EOP.

Emergency Operations Plan

TABLE 3

EMERGENCY OPERATION PLAN CONTACT LISTING

	Title	Name	PUCT Responder ⁸ (YES/NO)	Contact Information	Primary (P)	Backup (B)
1	Business Team Leader, AR	Brett Howard	YES	979-236-5747	X	
2	Operations Supervisor, Backup AR	Ivan Villarreal	YES	956-455-6310		X
3	Emergency Response Team Leader	Ronnie Thompson	YES	346-274-0617		X
4	Production Superintendent	Steve Miller	YES	979-248-9811		X
5	Operations Manager, VP	Jim Baron	YES	618-531-3443		X

⁸ This contact information is for the individuals who can immediately address urgent requests from the PUCT during an emergency.

Emergency Operations Plan

ATTESTATION OF ANNUAL REVIEW

This EOP has been reviewed by the Sweeny Cogeneration LLC Management. And the following changes were made:

- After reviewing the EOP procedure "Sweeny Refinery Control and IT Systems Business Recovery Plan" was added to Section 10.1.7 Restoration Annex 7.
- Updated Table 1 Emergency Operations Plan Distribution Listing
- Updated Table 3 Emergency Operation Plan Contact Listing

Please find attached revised procedure.

I, Bill Stone, attest that the above statements are true to the best of my knowledge.

Title: Vice President of Sweeny Cogeneration LLC

Name: Bill Stone

Signature: _____

THIS DOCUMENT AND AN AFFIDAVIT MUST BE FILED WITH THE PUCT BY MARCH 15 OF EACH YEAR COMMENCING IN 2023.

NOTE: An Affidavit is also required to be submitted to the PUCT.

Emergency Operations Plan

ENCLOSURE 3

Sweeny Cogen PUCT REQUIREMENTS MATRIX

Emergency Operations Plan

Section	Sub-Section	16 TAC 25.53 Requirement	Procedure/Page	Annex
(c) Filing Requirements	(c)(1)	An entity must file an emergency operations plan (EOP) and executive summary under this section by April 15, 2022.	Sweeny Cogen Emergency Operations Plan, Page 8, Section 9.2.	
(c) Filing Requirements	(c)(1)(A)(i)	An entity must file with the commission: an executive summary that: <ul style="list-style-type: none"> (a) describes the contents and policies contained in the EOP; (b) includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule; (c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and (d) contains the affidavit required under subparagraph (c)(4)(C) of this section. 	Sweeny Cogen Emergency Operations Plan: <ul style="list-style-type: none"> (a) Page 3, Section 1.0 (b) Page 3, Section 1.0 (c) Page 3, Section 1.1.7 (d) Page 29, Enclosure 1.1.4 	
(c) Filing Requirements	(c)(1)(A)(ii)	A complete copy of the EOP with all confidential portions removed.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.2.	
(c) Filing Requirements	(c)(1)(B)	For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.3.	
(c) Filing Requirements	(c)(1)(D)	An entity must make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.2.	
(c) Filing Requirements	(c)(3)	An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:	Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.	

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(c) Filing Requirements	(c)(3)(A)	<p>An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:</p> <p>(i) file with the commission an executive summary that:</p> <p>(a) describes the changes to the contents or policies contained in the EOP;</p> <p>(b) includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;</p> <p>(c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and</p> <p>(d) contains the affidavit required under subparagraph (c)(4)(C) of this section.</p> <p>(ii) file with the commission a complete, revised copy of the EOP with all confidential portions removed; and</p> <p>(iii) submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.</p>	Sweeny Cogen Emergency Operations Plan, Page 3, Section 1.0.	
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(c) Filing Requirements	(c)(3)(B)	<p>An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:</p> <p>(i) a pleading that documents any changes to the list of emergency contacts as provided under subparagraph (c)(4)(B) of this section;</p> <p>(ii) an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and</p> <p>(iii) the affidavit described under subparagraph (c)(4)(C) of this section.</p>	<p>(i) Sweeny Cogen Emergency Operations Plan, Page 27, Table 2, Approval and Summary of Changes.</p> <p>(ii) Sweeny Cogen Emergency Operations Plan, Page 30, Enclosure 2, Attestation Example.</p> <p>(iii) Sweeny Cogen Emergency Operations Plan, Page 29, Enclosure 1, Affidavit Example.</p>	
(c) Filing Requirements	(c)(3)(C)	<p>An entity must update its EOP, or other documents required under this section if commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency. If directed by commission staff, the entity must file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.</p>	<p>Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.3.1.2 and 9.3.1.3.</p>	
(c) Filing Requirements	(c)(3)(E)	<p>An entity must make a revised unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.</p>	<p>Sweeny Cogen Emergency Operations Plan, Page 9, Section 9.2.</p>	
(c) Filing Requirements	(c)(4)	<p>In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:</p>		

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(c) Filing Requirements	(c)(4)(A)	A record of distribution that contains the following information in table format: (i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and (ii) dates of access to or training on the EOP, as appropriate.	Sweeny Cogen Emergency Operations Plan, Page 6, Section 5.0. Sweeny Cogen Emergency Operations Plan, Page 26, Table 1, Emergency Operation Plan Contact Listing.	
(c) Filing Requirements	(c)(4)(B)	A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.	Sweeny Cogen Emergency Operations Plan, Page 28, Table 3, Emergency Operation Plan Contact Listing.	
(c) Filing Requirements	(c)(4)(C)	An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following: (i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been conducted to the extent required by subsection (f) of this section; (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and (vi) the entity'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,	Sweeny Cogen Emergency Operations Plan, Page 29, Enclosure 1, Affidavit Example.	

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		IS-200, IS-700, and IS-800 National Incident Management System training.		
(d) Information to be included in the emergency operations plan	(d)	An entity's EOP must address both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies, including those listed in subsection (e) of this section. An EOP may consist of one or multiple documents. Each entity's EOP must include the information identified below, as applicable. If a provision in this section does not apply to an entity, the entity must include in its EOP an explanation of why the provision does not apply.	Sweeny Cogen Emergency Operations Plan, Whole Document Emergency Action Plan, Pages: ICP Core Plan pages 30-45	
(d) Information to be included in the emergency operations plan	(d)(1)	An approval and implementation section that: (A) introduces the EOP and outlines its applicability; (B) lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP; (C) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (c)(1) of this section; (D) provides a dated statement that the current EOP supersedes previous EOPs; and (E) states the date the EOP was most recently approved by the entity.	Sweeny Cogen Emergency Operations Plan (A) Page 5, Section 2.0. (B) Page 5, Section 4.0 (C) Page 27, Table 2, Approval and Summary of Changes (D) Page 27, Table 2, Approval and Summary of Changes (E) Page 27, Table 2, Approval and Summary of Changes	
(d) Information to be included in the emergency operations plan	(d)(2)	A communication plan	Internal & External Communications, Pages: ICP Core Plan pages 45-50 Sweeny Cogen Emergency Operations Plan, Page 7, Section 7.0.	

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(d) Information to be included in the emergency operations plan	(d)(2)(B)	An entity with generation operations must describe the procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.	Internal & External Communications, Pages: ICP Core Plan pages 49-50 Sweeny Cogen Emergency Operations Plan, Page 3, Section 1.1.5.	
(d) Information to be included in the emergency operations plan	(d)(3)	A plan to maintain pre-identified supplies for emergency response.	Hurricane Plan (PRIVATE & CONFIDENTIAL), Attachment 10.4 Logistics Plan Sweeny Cogen Emergency Operations Plan, Page 8, Section 8.4.	Hurricane annex
(d) Information to be included in the emergency operations plan	(d)(4)	A plan that addresses staffing during emergency response.	Hurricane Plan (PRIVATE & CONFIDENTIAL), Attachment 10.9 Hurricane Staffing Sweeny Cogen Emergency Operations Plan, Page 7, Section 6.0.	Hurricane annex
(d) Information to be included in the emergency operations plan	(d)(5)	A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP.	Sweeny Cogen Emergency Operations Plan, Page 7, Section 8.2.2.1. Severe Weather, Pages: ICP Annex XIII pages 144-145	Weather Emergency annex

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(d) Information to be included in the emergency operations plan	(d)(6)	Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.	Sweeny Cogen Emergency Operations Plan, Page 10, Section 10.0.	
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	(i) SW-COGEN-EOP-GEN02 – Cogen Freeze Protection Actions, Pages: Whole Document (i) SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document (i) Severe Weather, Pages: ICP Annex XIII pages 144-145 (ii) Not applicable, Sweeny Cogen has no fuel switching capability (iii) Cogen Freeze Rounds Logsheet, Pages: Whole Document (iii) SW-COGEN-EOP-GEN03 – Cogen Hot Weather Actions, Pages: Whole Document	Weather Emergency annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	SWE-RWT-NOP-SBR01 Raw Water Inventory Management Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document	Water shortage annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	Core Plan Establish Objectives & Priorities, Pages: ICP pages 52-54	Restoration annex

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(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	Sweeny Refinery Pandemic Plan (2020) V4 (PRIVATE & CONFIDENTIAL), pages: Whole Document	Pandemic and epidemic annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Hurricane Plan (PRIVATE & CONFIDENTIAL), Pages: Whole Document Hurricane Plan Core Plan, Pages: ICP Annex XV pages 147-156 Hurricane Preparation List, Pages: ICP Annex XVI pages 157-158 Personal Hurricane Plan, Pages: ICP Annex XVIII pages 159-160	Hurricane annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document O-33-BP-01 Industrial Control Systems Cyber Security Incident Response Process, Pages: Whole Document	Cyber security annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	ICP-GOV-09 Cyber Security Incident Response and CIP Exceptional Circumstances, Pages: Whole Document Prevention, Pages: ICP Annex IX page 137 Bomb Threat Procedure, Pages: ICP Annex IV pages 100-107	Physical security incident annex

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(f) Drills		<p>An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.</p>	<p>Hurricane Plan (PRIVATE & CONFIDENTIAL), Page 15</p> <p>Sweeny Cogen Emergency Operations Plan, Page 6, Section 5.0.</p> <p>Training, Exercises & Drills, Pages: ICP Annex X pages 143-145</p>	
(g) Reporting requirements		<p>Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.</p>	<p>Sweeny Cogen Emergency Operations Plan, Page 8, Section 8.2.11.</p>	