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TEMPLE GENERATION I, LLC

Delivered via FedEx

April 12, 2022

Public Utility Commission of Texas
Attn: Filing Clerk
1701 N. Congress Avenue
Austin, Texas 78711-3326

RE: Temple Generation I, LLC
Facility Emergency Operating Plans
Generating Units: TMPLCT1, TMPLCT2, TMPLST1

To whom it may concern:

Pursuant to Title 16 of the Texas Administrative Code (16 TAC), §25.53 (Electric Service Emergency Operations Plans), Temple Generation I, LLC is providing a copy of the emergency operations plan, executive summary, and associated affidavit affirming the items listed in 16 TAC §25.53(c)(4)(C).

Should you require further information or have any questions, please do not hesitate to contact William Petersen at 254-598-3705 or wpetersen@pandatempletx.com.

Sincerely,

Sean Hausman
Plant Manager
Temple Generation I, LLC

cc: ERCOT Market Information System (MIS)

6. Affidavit

STATE OF Texas §

COUNTY OF Bell §

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on their oath that they are entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

I swear or affirm that the attached report was prepared under my direction, and that I have the authority to submit this report on behalf of the reporting party. I further swear or affirm that all statements made in the report are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner.

Signature of Authorized Representative

Robert Dowd

Printed Name

Name of Reporting Party

Sworn and subscribed before me this 12 day of April, 2022.

Month Year

SANDY FELONE JOHNSON
Notary Public, State of Texas
Comm. Expires 01-26-2026
Notary ID 129085130

Notary Public in and for the State of Texas

Temple Generation I LLC	ADMINISTRATIVE MANUAL	
Number: **AMP-116**	Subject: **Business Continuity Plan**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplepx.com, c=US Date: 2022.04.12 10:55:06 -05'00'	Current Issue: **Rev 0**	Issue Date: **April 12, 2022**

1. PURPOSE

The purpose of this procedure is to restore plant and business operations following a major event or disaster that would have caused interruption to plant business systems, control systems and/or physical equipment damage.

2. GENERAL OFFICE ADMINISTRATION

The General Manager and Plant Management Team are jointly responsible for ensuring the restoration of plant control systems and business systems and a return to a reliable operation of power plant equipment and business functions. In addition, the General Manager is responsible for coordination with the Corporate IT department to restore business IT functionality if impacted.

3. PLANT CONTROL SYSTEMS

PRIMARY PLANT DISTRIBUTED CONTROL SYSTEM (DCS)

The primary plant control system (Siemens T3000) is backed-up on at least an annual basis with a copy stored on the T3000 terminal server, a second independent copy is stored on a portable hard drive and stored on site in a fireproof safe and a third copy is stored remotely by Siemens Energy.

STAND ALONE PLC (PROGRAMMABLE LOGIC CONTROLLERS)

Stand-alone PLCs control critical plant auxiliary systems on site. PLC Program copies are saved on an annual basis and stored on the Business Network L: Drive with a second copy on a portable hard drive and stored on site in a fireproof safe. These PLC controlled systems are:

Condensate Polishers
Auxiliary Boiler
ZLD Brine Concentrator and Crystallizer
Raw Water Treatment
HRSG Duct Burners (2)
Continuous Emissions Monitoring (2)
Emergency Diesel Generator

4. BUSINESS NETWORK

The Corporate IT Team maintains a system of real time data replication and storage to enable a timely restoration and replication of the business network if necessary. Plant based business network servers are located within the secured plant site protected by fencing with controlled gate access. Site security is maintained by an on-duty security guard. The business network server is maintained in a locked and climate-controlled server room within the confines of the Administration Bldg. Business network hardware is powered from the plant Uninterruptible Power Supply system with generator and battery back-up.

5. STAFFING

The Temple Staffing Plan consists of (35) full time positions including (5) Management Staff and (30) hourly employees performing O&M roles. Key Management Staff include the General Manager, Operations Manager, Maintenance Manager, Plant Engineer and Administrative Manager.

Specific Management Staff administrative functions required to maintain business continuity are outlined in a Business Continuity Task Matrix assigning primary and back-up responsibilities of staff members to minimize interruptions in the event a staff member becomes unavailable.

Temple Generation I, LLC	Emergency Operations Plan	
Number: **EOP**	Subject: **Executive Summary**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=hausman@pandatemple1x.com, c=US Date: 2022.04.12 10:54:23 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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EOP SECTIONS

1. Purpose

Temple Generation I, LLC has developed this Emergency Operations Plan in accordance with TAC Rule §25.53 Electric Service Emergency Operations Plans, describing the actions to be taken by the organization in response to emergency scenarios outlined by this plan. This Emergency Operations Plan and its associated subsections will be used in conjunction with other plant specific procedures when responding to these emergencies. It also sets forth the specific actions to be taken by Plant Staff and support personnel during a power plant emergency.

2. Summary of Roles and Responsibilities

2.1. General Manager

The Temple Generation I, LLC General Manager is the designated Site Emergency Manager (SEM), with responsibility to provide the necessary authority to commit the appropriate resources to accommodate and follow the Emergency Operations Plan. The General Manager is the designated Temple Generation I, LLC representative who will interact with local, state, and federal emergency management officials during emergency events. Other qualified individuals may be designated to act as the SEM in the absence of the General Manager as outlined herein.

2.2. Operations Manager, Maintenance Manager, Plant Engineer

The Operations Manager will serve as the primary back-up to the General Manager to perform the duties of the SEM in the event the General Manager is unavailable.

The Operations Manager, Maintenance Manager and Plant Engineer will support the active SEM in respond to the events outlined in the Emergency Operations Plan.

The Plant Engineer is responsible for maintaining and updating this procedure and will coordinate the necessary training and drills in accordance with the plan.

2.3. Operations Shift Supervisors, Control Room Operators

The Shift Supervisor on duty will be designated as the SEM in the absence of Plant Management. If the Shift Supervisor on duty is unable to perform the duties of the SEM the Control Room Operator will act on their behalf until a Shift Supervisor or a member of the Plant Management Team properly relieves them of their duties of the SEM.

2.4. All Temple Generation I, LLC Employees

All employees are responsible for gaining an understanding of this procedure by attending training and drills as required. All employees are expected to support

response activities for the events outlined under the Emergency Operations Plan as directed by the Temple Generation I, LLC SEM.

3. Organization

3.1. Temple Generation I, LLC Site Emergency Manager (SEM)

Temple Generation I, LLC shall have a person designated as the Site Emergency Manager (SEM) who will immediately take charge and direct the immediate responses required for any emergency outlined by the Emergency Operations Plan. The on-duty SEM will make the necessary notifications to the Plant Management Team if not present at the time of the event. The Plant General Manager or designee will notify the BKV-BPP JV Corporate Leadership Team of the ongoing or developing concern and will coordinate with the Corporate Leadership Team regarding the appropriate response actions.

3.2. BKV-BPP JV Corporate Leadership Team

The Corporate Leadership Team will support the Site Emergency Manager as required to facilitate the appropriate response to emergencies outline by the Emergency Operations Plan. The General Manager will be the primary point of contact to the Temple Generation I, LLC SEM and will solicit and direct other members of the Corporate Leadership Team as appropriate to support the Site Emergency Manager.

The Corporate Leadership Team under the guidance of the General Manager will manage all communications with outside entities including the news media and public notifications or inquiries. The General Manager or his designee will be the primary spokesperson for BKV-BPP regarding external communications related to incidents outlined in the Emergency Operations Plan.

4. Temple Generation I, LLC Facility Location

4.1. Temple Generation I, LLC; 2829 Panda Drive Temple, Texas 76501

4.2. Latitude: N 31.0586º Longitude: W 97.3167º

5. Events/Activation

5.1. Emergency Operations Plan Applicability

This Emergency Operations Plan applies to the Temple Generation I, LLC facility located at the address of 2892 Panda Drive, Temple Tx 76501 and includes any associated ancillary facilities owned by the project.

5.2. Activation of the Emergency Operations Plan

The Temple Generation I, LLC Site Emergency Manager or active designated SEM is responsible for activating the EOP and determining what actions to take immediately following the occurrence of the events outlined in the Emergency Operations Plan. When appropriate, the Temple Generation I, LLC SEM will make notification to the BKV-BPP JV Corporate Support Team in accordance with the guidance contained in this Emergency Operations Plan. The BKV-BPP JV General Manager is responsible for determining the appropriate degree of overall corporate response required and implementing those appropriate actions.

The following are events included in the scope of the Emergency Operations Plan. The degree of response under the EOP will be determined by the severity of the event, potential consequences, and impact to the facility.

5.3. Events

5.3.1 Weather
5.3.2 Hurricanes
5.3.3 Restoration of Services
5.3.4 Pandemic
5.3.5 Cyber Security Incident
5.3.6 Physical Security Incident
5.3.7 Water Shortage Incident

5.4. Emergency Operations Plan Immediate Actions

5.4.1 The following priorities are to be considered by the Temple Generation I, LLC SEM in response to events outlined in the Emergency Operations Plan.

5.4.1.1 Personnel Safety.

5.4.1.2 Initiate local Emergency Response (911) as appropriate. (EMS, Fire and Police)

5.4.1.3 Environmental and Facility Equipment Protection.

5.4.1.4 Communicate facility status to Qualified Scheduling Entity (QSE) as appropriate.

5.4.1.5 Notification to Plant Management Team and BKV-BPP JV Senior Management

5.4.1.6 Minimize impact to facility restoration and operations.

Record of Distribution

Copies of this Temple Generation I, LLC Emergency Operations Plan have been copied to the following internal and external entities:

Temple Generation I, LLC Plant Management Team
BKV-BPP JV Corporate Leadership Team
Public Utility Commission of Texas (PUCT)
Electric Reliability Council of Texas (ERCOT)

6. Affidavit

STATE OF _____§

COUNTY OF _____§

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on their oath that they are entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

I swear or affirm that the attached report was prepared under my direction, and that I have the authority to submit this report on behalf of the reporting party. I further swear or affirm that all statements made in the report are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner.

_____

Signature of Authorized Representative

_____

Printed Name

_____

Name of Reporting Party

Sworn and subscribed before me this _____ day of _____, _____.

Month Year

_____

Notary Public in and for the State of _____

7. Record of Distribution

Name	Job Title	Date of Access to Training
Sean Hausman	Plant General Manager	
Trent Simpson	Maintenance Manager	
Mike Willadsen	Operations Manager	
Sandy Felone Johnson	Business Manager	
Bill Petersen	Compliance Manager	
Moody Evans	Planner/Scheduler	
Mark Wilmoth	Warehouse Manager	
Kenneth Massar	Shift Supervisor	
Marselino Benites	Shift Supervisor	
Tommy Woolbright	Control Room Operator	
Daniel Massar	Auxiliary Plant Operator	
Jimmy Seymour	Auxiliary Plant Operator	
Scott Smith	Shift Supervisor	
Jack Lowery	Shift Supervisor	
Truitt Jones	Control Room Operator	
Frank Benites	Auxiliary Plant Operator	
Levi Wadlington	Auxiliary Plant Operator	
Chandler Goode	Auxiliary Plant Operator	
Jeremy Castillo	Shift Supervisor	
Peter Castro	Control Room Operator	
Derek Doss	Control Room Operator	
Landon Graham	Auxiliary Plant Operator	
Justin Wimmer	Auxiliary Plant Operator	
Chris Thomas	Auxiliary Plant Operator	
Paul Mroz	Control Room Operator	
Brian Gately	Auxiliary Plant Operator	
Mark Cates	Auxiliary Plant Operator	
Doug Barry	Auxiliary Plant Operator	
Greg Shehorn	ICE Technician	
Greg Jurek	ICE Technician	
Jack Bond	ICE Technician	
Steve Carruth	ICE Technician	
Justin Kirk	Mechanic	
Ben Martin	Mechanic	
Carl Hubnik	Mechanic	

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 1**	Subject: **Emergency Response Overview**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplelx.com, c=US Date: 2022.04.12 10:55:35 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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1. Emergency Response Protocol

1.1. If an Emergency Operations Plan event occurs the following response organization shall be implemented:

	Initial	Subsequent (If Required)
Emergency Coordinator	Shift Supervisor/ Control Room Operator	Site Emergency Manager (SEM)
Communications	Shift Supervisor/ Control Room Operator	Operations Manager(or their designee)

1.2. Typical Operations Shift staffing consists of (1) Shift Supervisor, (1)Control Room Operator, (1) Auxiliary Operator. The SEM and Plant Management Team will evaluate any immediate impacts to the facility and add additional in-house and/or contract staffing as required for event response.

1.3. The Shift Supervisor is responsible for initiating the immediate response actions, for observing overall plant operations, and ensuring the plant remains in a safe condition. If the Shift Supervisor is unable to initiate the immediate response, the Control Room Operator will act on behalf of the Shift Supervisor until a Shift Supervisor or SEM is available to relieve them.

1.4. During an emergency event, the Shift Supervisor assumes the duties as the SEM (Site Emergency Manager) until relieved by a member of the Plant Management Team.

1.5. The Shift Supervisor or designee shall:

1.5.1 Take the necessary actions to stabilize plant operation if affected.
1.5.2 Evaluate operational & physical impact to the facility.
1.5.3 Request Emergency services if required.
1.5.4 Notify Plant Operations Manager & Plant Management Team.
1.5.5 Take the necessary corrective action to restore systems if Plant Operations have been impacted by the event.

1.6. General Response

1.6.1 Refer to specific applicable Emergency Operations Plan sections to guide emergency response actions.

1.6.2 Notify site personnel of plant event and any Safety concerns that may exist.

1.6.3 Control Room initiates phone calls for necessary off-site notification.

1.6.4 All other on-site personnel will monitor radio communications and support the appropriate response as directed by the SEM.

1.7. Emergency Response Plan Staffing Plan

1.7.1 The Temple Generation I SEM will evaluate the staffing needs of the Emergency Event and will determine the appropriate staffing levels needed to manage the event response. This could include the following as necessary:

Notifying additional Temple Management Staff and Employees to respond to the site to support the event response.

Procuring Contracted Support Companies to support the plant led event response with additional manpower and/or equipment as required.

1.7.2 A continuous and unobstructed way of exit travel from any point in a building or structure to a public way. A means of egress comprises the way of travel and shall include intervening room spaces, doorways, hallways, corridors, passageways, balconies, ramps, stairs, enclosures, lobbies, horizontal exits, courts and yards.

1.7.3 Exits will be marked with an exit sign and illuminated by a reliable light source.

1.7.4 Areas will have directions to exits, when not immediately apparent, marked with visible signs.

1.7.5 Doors, passageways, or stairways, that are not exits or access to exits, which could be mistaken for exits, will be appropriately marked "NOT AN EXIT."

1.7.6 All exits signs will be provided with the word "EXIT" in letters at least 5 inches high and 1/2 inch wide.

1.7.7 All exit doors must be side-hinged and kept free of obstructions.

1.7.8 There must be at least two means of egress provided from elevated platforms, pits or rooms where the absence of a second exit would increase the risk of injury from hot, poisonous, corrosive, suffocating, flammable, or explosive substance.

1.7.9 There must be sufficient exits to permit prompt escape in case of emergency with special precautions taken to protect employees during construction and repair operations.

1.8. Emergency Response Supplies

1.8.1 Temple maintains an inventory of supplies for response to extreme hot and cold weather events, spill response, and expected consumable items to support O&M personnel needs. Weatherization supplies are inventoried prior to the winter season. Temple maintains an inventory of spare parts and consumables to support maintenance and replacement of critical plant equipment to minimize the impact to plant availability.

1.8.2 All exit doors will operate in the direction of exit travel without the use of a key or any special knowledge or effort when the building is occupied.

1.8.3 All exit doors opening directly onto any street, alley or other areas where vehicles may be operated will have adequate barriers and warnings provided to prevent employees stepping into the path of traffic.

1.8.4 Exterior exit access ways must be kept clear of snow and ice to allow for egress.

1.9. Recovery

1.9.1 Upon conclusion of an Emergency Event Response the SEM and Plant Management staff will give the approval and direction to restore plant systems as necessary and restore generation capability as allowed through communication will the Qualified Scheduling Entity. Refer to Section 5 of this EOP for plant recovery and restoration protocol.

2. COMMUNICATIONS PLAN

2.1 Upon activation of the EOP due to an event covered under this plan the active SEM will notify the Plant Management Team if not on site at the time of event. The typical chain of command would be notification to the Plant Operations Manager followed by the Operations Manager notification to the Plant General Manager. The Plant General Manager or his designee will make notification to the BKV-BPP JV General Manager or his alternate of the pending or active event as appropriate based on the type and severity of the event. The SEM will communicate and coordinate response actions with local response agencies, officials and emergency operations centers as appropriate for the event circumstances.

2.2 The BKV-BPP JV Leadership Team under the direction of the General Manager will manage all communications with outside regulatory entities as appropriate including the news media and public inquiries. The Plant General Manager or his designee will be the primary spokesperson for Temple Generation I regarding external communications related to incidents outlined in the Emergency Operations Plan. Immediate Media inquiries at the plant location will be directed to the Plant General Manager or his designee as appropriate and will communicate these inquiries to the Corporate Leadership Team as appropriate.

2.3 The active SEM at the onset of the event or his designee (Control Room Operator) will make the appropriate communications to ERCOT via the Temple Generation I designated Qualified Scheduling Entity and/or ONCOR (Transmission Operator) if plant status has been immediately impacted by the event.

2.4 Any written communications in response to inquiries from any outside entities should be routed and reviewed by the appropriate members of the Corporate Leadership Team.

2.5 General plant staff shall not respond to outside inquiries related to any events covered under this Emergency Operations Plan.

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 2**	Subject: **Emergency Contacts**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplepx.com, c=US Date: 2022.04.12 10:56:11 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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1. Emergency Contact Phone Numbers

Contact	Phone Number
General Manager (Sean Hausman) Primary SEM	832-726-9029
Operations Manager (Mike Willadsen) Back-up SEM	432-213-0589
Maintenance Manager (Trent Simpson)	512-825-7585
Plant Engineer (William Petersen)	254-644-8614
BKV-BPP JV (Robert Dowd) Primary Corporate Point of Contact	704-516-6033
BKV-BPP JV; Asset Manager (Jay Hurst) Back-up Corporate Point of Contact	713-213-2313

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 3**	Subject: **Weather Emergency**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplepx.com, c=US Date: 2022.04.12 10:56:38 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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1. Introduction

1.1. The Temple plant utilizes AccuWeather's SkyGuard Warning System:

AccuWeather Portal – https://enterpriseportal-v2.accuweather.com/
Username: pandatemplecr@pandatempletx.com
Password: panda1
AccuWeather Phone: 316.266.8000

1.2. When the plant receives an Accuweather Tornado Alert, via email or website prompt, all steps applicable to this procedure are to be entered in the plant Control Room applicable logbook by the on-shift Control Room Operator.

2. Lightning

2.1. The Control Room Operator will monitor AccuWeather radar for lightning strikes and be cognizant of site observations.

2.2. If a lightning strike is observed within a 10-mile radius, the following shall occur:

2.2.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. Lightning has been observed within 10 miles of the plant. All upper level elevated work activities are suspended. Please return to ground level."

2.2.2 Repeat the announcement above.

2.2.3 All elevated work will be stopped in the following areas:

2.2.3.1 Top of the HRSGs
2.2.3.2 Steam turbine and pipe rack upper levels
2.2.3.3 CTG inlet filter houses
2.2.3.4 Top of the cooling tower
2.2.3.5 Brine concentrator and elevated platforms

2.3. If a lightning strike is observed within a 6-mile radius, the following shall occur:

2.3.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. Lightning has been observed within 6 miles of the plant. All non-essential outdoor work activities are suspended."

2.3.2 Repeat the announcement above.

2.3.3 Site management and/or the Shift Supervisor will determine which activities will be considered essential to plant operations and will be allowed under these conditions.

2.4. When no lightning strikes are indicated on AccuWeather radar within 6 miles for at least 10 minutes:

2.4.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. No lightning strikes have been observed within 6 miles for 10 minutes. Non-essential outdoor work activities are now permitted. All upper level elevated work activities remain suspended until further notice."

2.5. When no lightning strikes are indicated on AccuWeather radar within 10 miles for at least 20 minutes:

2.5.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. No lightning strikes have been observed within 10 miles for 20 minutes. All outdoor work activities are now permitted without restrictions."

2.6. Monitoring may be discontinued once all AccuWeather lightning warnings have been terminated or expired and no further threats are expected.

3. Tornados

3.1. If an AccuWeather Tornado Watch is issued for the plant, the following will be performed:

3.1.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. A Tornado Watch has been issued for the area. All site personnel are instructed to proceed immediately to ground level. Ground level work is permitted but is limited to storm preparation and basic maintenance activities."

3.1.2 Repeat the announcement above.

3.1.3 Any personnel, contractors, and visitors working above the ground floor will proceed immediately to the ground level.

3.1.4 Once personnel are at ground level they will begin readiness work for a potential storm.

3.2. If an AccuWeather Tornado Warning is issued for the plant, the following will be performed:

3.2.1 The Control Room Operator will make the following radio announcement:

> "Attention in the plant. Attention in the plant. A Tornado Warning has been issued for the area. All site personnel are instructed to secure all portable equipment and proceed immediately to a safe area. Close all windows, blinds, and doors and await further instructions."

3.2.2 Repeat the announcement above.

3.2.3 All personnel, contractors, and visitors will secure portable equipment and proceed to a safe area. All personnel, contractors, and visitors must be mustered and accounted for.

3.2.4 All personnel will ensure building windows are closed and shades fully lowered.

3.2.5 Plant operators will ensure all plant building doors are fully shut.

3.2.6 The Shift Supervisor or Control Room Operator shall notify the Plant General Manager and the Qualified Scheduling Entity (QSE) that a Tornado Warning has been issued for the site and proceed with actions as directed by those sources.

3.3. If a tornado is spotted by plant personnel or the site receives notification that a tornado converging on the site is likely, the following will be performed:

3.3.1 The Control Room Operator will make the following radio announcement:

> "Attention in the plant. Attention in the plant. A tornado is approaching the site. Take cover immediately. The control room is being evacuated."

3.3.2 Repeat the announcement above.

3.3.3 Leave the plant in its current configuration.

3.3.4 Operations personnel will collect the control room radio and cell phone and proceed immediately to the storm shelter area.

3.3.5 The Shift Supervisor will notify the Qualified Scheduling Entity (QSE) that the control room has been evacuated and provide an update on the configuration of the plant.

3.3.6 No personnel shall leave the shelter areas without full authorization by the Site Emergency Manager (SEM).

3.4. Once the storm has cleared, the following will be performed:

3.4.1 The SEM will notify all personnel, contractors, and visitors that it is safe to leave shelter. It may be necessary to perform this action at each shelter if radios are unavailable or if site conditions warrant individual area assessments first.

3.4.2 A muster shall be performed to account for all site personnel. Any missing personnel must be located. Medical emergencies shall be handled in accordance with ICP-10.

3.4.3 Plant personnel will survey the site to assess plant damage, exercising extreme caution while navigating the area. Verbal updates will be provided to the SEM as conditions are evaluated.

3.4.4 Any damage found will be documented and evaluated prior to return to service. Spills, fires, and pond damage shall be addressed in accordance with their respective ICPs.

3.4.5 The Shift Supervisor shall update the Plant General Manager (if not on site) and the Qualified Scheduling Entity (QSE) on plant status and site condition.

3.4.6 The Plant General Manager shall update the BKV-BPP JV Corporate Leadership Team on plant status and site condition as appropriate.

3.4.7 The SEM will coordinate all subsequent activities. Plant cleanup efforts and system restoration shall be performed in accordance with plant procedures as experience and system evaluation dictates.

4. Winter Storms

4.1. If forecasted temperatures are expected to be <20° F at any point or forecasted to be below freezing for >24 hours, the Plant Management Team will discuss and determine additional plant staffing to support cold weather operations. This additional staffing could include additional ICE , Maintenance, and Operations support personnel as well as contract personnel if necessary.

4.2. For long duration forecasted winter events, evaluate the necessity of on site or local housing and food accommodations for plant staffing. Make arrangements as necessary.

4.3. Evaluations should be made to determine if additional winterization efforts should be implemented based on forecasted elements associated with event. Evaluations at a minimum should include:

4.3.1 Insulation and lagging integrity

4.3.2 Water leaking from system piping or lagging

4.3.3 Verify all instrument sensing lines are adequately covered with insulation and heat tracing

4.3.4 Determine if additional temporary or permanent wind breaks are required to protect critical equipment or instrumentation from forecasted elements.

4.4. Supplies utilized in response to an event should be staged in strategic locations to expedite response times from personnel should and adverse condition exist during a cold weather event.

4.5. Electrical heat trace should be verified to be in proper working order prior to event.

4.6. During snow and ice storms, pay close attention to snow and ice accumulation around equipment, doorways, and on buildings and tanks. Consider blocking pathways in areas where ice mitigation is not practical or feasible.

4.7. Evaluate plant walkways for ice accumulation. Remove as necessary for access to plant areas. If icing is forecasted, consider pre-salting walkways and roadways where feasible.

4.8. Shift inspections conducted in accordance with ICP-16 Appendix 5. Appendix 5 is intended to be utilized on a daily basis and can span two shifts as weather conditions permit.

4.9. A DCS screen has been created for monitoring the critical transmitters listed on ICP-16 Appendix 10. Additionally, iMonnit uses remote temperature sensors in the transmitter boxes and is continuously monitored through a web interface.This page must be monitored continuously whenever weather conditions warrant inspections in accordance with ICP-16, Appendix 5.

4.10. Document any issues observed during the course of the season and make any necessary revisions/improvements to ICP-16.

5. Heavy Winds

5.1. During periods of heavy winds, caution should be exercised while outside. If storms are in the immediate area of the plant, outside activities should be curtailed as much as possible. Personnel shall avoid being in the highest elevation on any structure.

5.2. Ensure no loose materials are left exposed in the plant.

5.3. Place overhead cranes in the storage position and lock in place.

5.4. During periods of high winds it will be necessary to monitor the cooling tower. If it is safe to do so, visually inspect the basin for debris accumulation. Monitor circulating water pump discharge pressures.

6. Flooding

6.1. The site should be monitored for rising water.

6.2. No personnel should enter or cross a suspected high water level area.

6.3. Any equipment exposed to rising water shall be shut down prior water immersion. Notify plant management if equipment shutdown will necessitate plant shutdown.

6.4. All personnel shall proceed to high ground and stay out of the flood waters.

7. Extreme Heat

7.1. This extreme heat plan should be used in conjunction with the appropriate sections and tables of ICP-16 Seasonal Readiness Plan when responding to an extreme heat event.

7.2. Prior to extreme heat event, building HVAC inspections shall confirm proper operation of all temperature control units. This includes continuity checks and temperature controller verifications as applicable.

7.3. Evaluations of critical equipment should be made to determine if additional measures can or should be taken to minimize effects of extreme heat. (i.e. additional sunshades)

7.4. Temporary cooling equipment should be staged in convenient locations to expedite the response to an extreme heat condition. (i.e. air horns, vortex coolers, portable AC units)

7.5. Evaluations should be made to determine if additional staffing resources are needed during the extreme heat event.

7.6. All maintenance activities will be evaluated to determine potential risks to operability during extreme heat conditions and will be deferred to off peak hours or following the extreme heat incident if warranted and depending on the severity of the event, all maintenance activities may be limited to emergent work only.

7.7. Screen equipment deficiencies for potential impact and prioritize their resolution as required to ensure reliable operation during extreme heat event.

7.8. Monitor plant operations during extreme heat event to identify weaknesses. Document items that were affected by extreme heat conditions and create work orders for resolution.

7.9. 4.10. Document any issues observed during the course of the season and make any necessary revisions/improvements to ICP-16.

8. Drought

The facilitie's make up water primarily consists of reclaimed water from the city of Temple/Belton waste water treatment facilities. The reclaim water can be supplemented with potable water from the city. During a drought event, the facility will work with the city to conserve potable water usage.

Maintain regular communication with the City of Temple/Belton regarding seasonal raw water flow.

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 4**	Subject: **Hurricane**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatempletx.com, c=US Date: 2022.04.12 10:57:15 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

1. Hurricane Procedures

1.1 The Temple Generation I LLC facility is located in Bell County, TX. and, is not located in a designated evacuation zone as outlined by the Texas Division of Emergency Management. Based on this location, an Emergency Operations Plan Section pertaining to Hurricane Response is not applicable to this facility.

1.2 Any weather related remnants experienced at the site from a hurricane that makes landfall on the gulf is covered under Section 3 (Weather) of the Emergency Operations Plan.

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 5**	Subject: **Restoration of Service**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatempletx.com, c=US Date: 2022.04.12 10:57:37 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

1. Priorities for Recovery of Generation Capacity

The Temple Generation I LLC facility is registered as a Generation Resource.

If the Generation Resource has experienced a reduction of generating capability due to a “Failed Start” or “Generator Trip” attributable to a Hazard or Threat, an investigation will be initiated to determine the direct cause of the failure. An assessment will be completed to determine if the initiating Hazard or Threat can be mitigated or eliminated to allow a return to service without further risk to plant equipment and capability.

During this investigation and recovery phase the Operations Team will provide updates to ERCOT through the Qualified Scheduling Entity on assessment findings and estimated return to service.

The Plant Management team will initiate the appropriate response actions to perform any necessary corrective actions to restore generation capability of the plant.

Once the threat or hazard that caused impact to the generating capability of the plant has passed or has been mitigated to reduce the risk to reliable operation of the facility, the SEM and the Plant Management Staff will determine if any corrective action is necessary. Once any required corrective actions have been completed the Plant Management Team will request a return to service via the Qualified Scheduling Entity and attempt to restore the full generation capability of the facility.

Temple Generation I, LLC	EMERGENCY OPERATIONS PLAN	
Number: **Section 6**	Subject: **Pandemic Plan**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatempletx.com, c=US Date: 2022.04.12 10:57:59 -05'00'	Current Issue: **REV 1**	Issue Date: **April 12, 2022**

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1. PANDEMIC PLAN

A list of personnel volunteering for pandemic duty will be obtained and posted at the issuance of Phase 2 of the Pandemic Plan.

Temple Generation I will attempt to staff the Pandemic crew with volunteers. If there are not enough volunteers, the Operation technicians scheduled to work the shifts (that are not replaced with volunteers) will be expected to stay through the Pandemic lock down operation.

2. PURPOSE

This Pandemic Operations Plan, (POP), has been developed to assure that the Temple Power Plant and its employees are prepared in the event a Pandemic condition should threaten the Temple area.

This procedure provides information and outlines steps to protect personnel and is a guideline to follow rather than a set of rigid rules.

For better preparedness and smooth transitions in case of the threat of a Pandemic the POP has been divided into three phases of readiness.

- **Three Stages of Preparation:**
    - **Stage 1:** Pandemic threat – prepare for subsequent stages
    - **Stage 2:** Threat to facility operation due to infection elevation – essential personnel only
    - **Stage 3:** Facility Lock Down Crews in place

2.1. Plan Elements for Stage 1

- Confirm VPN access for plant management, warehouse and other personnel who need remote access to business network.
- Purchase disinfectant wipes, hand sanitizer and other disinfectants and implement a program to ensure that telephones, counters, doorknobs and

other control handles are regularly disinfected.

- Ensure adequate food and sleeping accommodations in the plant to cover a Stage 3 event:
    - If the supply chain appears to be threatened: one week supply for Stage 3 Personnel of heat-and-eat meals, bottled water, breads, sodas, chips, etc. (Note that there will be three crews of operators and three maintenance techs (2 IC&E and 1 MM).
    - Cots, air mattresses, blankets, pillows, linens, etc.
- Develop lists of Essential Personnel (aka those who will report to the plant under Stage 2) and Stage 3 Personnel (those who will be part of a Facility Lock down Crew).
- Only perform maintenance required to keep the plant operational.
    - Minimize contractor access to those absolutely necessary to the continued operation of the facility. Notify non-essentials such as cleaning contractors that their service will discontinue until further notice.
    - Monitor any personnel on site for symptoms, and request anyone exhibiting such symptoms to leave the site immediately.

2.2. Plan Elements for Stage 2

- A Stage 2 declaration is at the discretion of the Plant General Manager.
    - An Event Notification Level 2 should be sent to all plant personnel following the decision to elevate to Stage 2
- Direct that only Essential Personnel should be at the site.
- Front Gate requirements
    - Security personnel will don a facemask during interaction with plant personnel and third-party contractors.
    - Temperature checks of all personnel entering the facility to verify

absence of fever.

- Complete virus threat/exposure checklist with third party contractors, excluding delivery drivers, entering the facility.

- Contractors shall wear a face mask when interacting with plant personnel.

- Essential Personnel should maintain approach distances whenever possible.

  - Per the Center of Disease Control (CDC), maintain at least 6 feet (2 arm lengths) from other people outside of essential plant personnel.

    - If 6 feet distancing is not possible:

      - To maximize protection and to prevent virus transmission, employees and contractors shall wear a mask when interacting.

- Institute a 4-6 hour schedule for wipe-downs of phones, doorknobs, counters and controls.

- Emphasize to all personnel the importance of washing hands often for at least 20 seconds. If soap/water is not readily available, use a hand sanitizer that contains at least 60% alcohol.

- Continue to closely monitor any personnel on site for flu-like symptoms, and request anyone exhibiting such symptoms to leave the site immediately.

- Arrange for chemical deliveries necessary to keep tanks "topped off" in case of a Stage 3 event.

- Site management personnel to conduct daily meetings to discuss recent events of the pandemic and update upper management as needed.

2.3. Plan Elements for Stage 3

- A Stage 3 declaration is at the discretion of the Plant General Manager.

  - An Event Notification Level 3 should be sent following the decision to elevate to Stage 3

- Mobilize Stage 3 Personnel
    - Employees should be prepared for a potential lock down.
- Restrict plant access only to Stage 3 personnel and essential contractors (chemical deliveries).
- Continue Stage 2 wipe-downs of phones, doorknobs, counters and controls.
- Site management personnel to conduct daily meetings to discuss recent events of the pandemic and update upper management as needed.

3. DUTIES AND RESPONSIBILITIES

Responsibilities during a Pandemic will follow normal operating routine. Special responsibilities are listed below.

3.1. Employees:

- Report to work as scheduled until such a time that Stage 3 of the POP has been declared.
- Any affected employee or the employee's immediate family member showing signs of illness should continue to stay home till they are cleared by a Physician.
- Based on Pandemic research/evaluation, additional policies may be locally implemented that cover travel guidelines, quarantine, return to work, and medical monitoring.

3.2. Site Management:

- Direct all plant activities.
- Initiate all phases of the POP as necessary.
- Release all non-essential personnel when/if appropriate.

4. REVISION HISTORY

REVISION HISTORY LOG Section 6- Pandemic Plan				
Rev.	**Date**	**Description**	**By Initials**	**Approval Initials**
0	7/3/2014	Issued	seh	seh
1	8/31/2021	Revisions to Stage 2 and Gate Checklist	WAP	SH
2	04/12/2022	Updated to comply with revised Rule 25.53	WAP	SEH
3				
4				

5. PANDEMIC PLAN FACILITY LOCK DOWN CREW

During a Pandemic Lock Down, a crew of 9 members will be designated from personnel on site and or the volunteer list. The volunteers are as follows:

Operations	Alternates
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

ICE	Mechanical
_____	_____
_____	

Note: 2 Shift Supervisors, 2 CRO's, 2 APO's, 1 Mechanical and 2 ICE.

6. FRONT GATE VIRUS THREAT / EXPOSURE CHECKLIST

During Stages 2 and 3 identified in this plan, front gate security personnel will complete the following checklist for all non-plant personnel prior to allowing entry to the facility. If non-plant personnel requesting access to the facility exhibit any of the symptoms below, security personnel will notify the control room for further instruction.

Date: _____

Contractor Name	**Contractor Personnel**

In the past 48 hours have you had the following symptoms:

☐Fever or chills

☐Cough

☐Shortness of breath or difficulty breathing

☐Fatigue

☐Muscle or Body aches

☐Headache

☐New loss of taste or smell

☐Sore throat

☐Congestion or runny nose (non-allergy related)

☐Nausea or vomiting

☐Diarrhea

** references CDC Facilities Screening

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 7**	Subject: **Cyber Security Incident**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplellc.com, c=US Date: 2022.04.12 10:58:23 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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1. PURPOSE

This plan addresses the actions and reporting procedures to be followed by Temple Generation I in the event of a Cyber Security Incident. This Plan ensures that an incident response plan is in place to detect and mitigate incidents and restore identified Bulk Electric System Cyber Systems (BCS) computing services.

2. SCOPE

This plan applies to all Temple Generation I employees, contract, and vendor personnel responsible for the operation, protection and maintenance of Bulk Electric System Cyber Systems (BCS) that support Bulk Electric Systems, including those having authorized cyber or authorized unescorted physical access to BCSs.

3. DEFINITIONS AND DEFINED TERMS

Cyber Security Incident: A malicious act or suspicious event that compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter or, disrupts, or was an attempt to disrupt, the operation of a BES Cyber System.

Reportable Cyber Security Incident: A Cyber Security Incident that has compromised or disrupted one or more reliability tasks of a functional entity.

NERC Glossary of Terms can be accessed by clicking the following link:
http://www.nerc.com/pa/Stand/Glossary of Terms/Glossary_of_Terms.pdf

4. ROLES AND RESPONSIBILITIES

Detection by direct observation and internal reporting of a Cyber Security Incident are the responsibilities of each Temple Generation I employee and vendor. These personnel are entrusted with the responsibility of safeguarding the physical or cyber security of CIP-related assets, which includes all identified Low Impact BCSs.

The following roles collectively comprise the Cyber Security Incident Response Team (CSIRT). These job titles have specific roles and responsibilities assigned to them. It is understood that all plants are different and may have various job titles that meet these roles.

A. Temple Generation I CIP SENIOR MANAGER OR DELEGATE(S)

Functions as the onsite incident responder providing overall direction and authority during a Cyber Security Incident, leading the classification and response to the incident, and coordinating other communication as necessary. The CIP Senior Manager or Delegate(s) assists in the determination of a Reportable Cyber Security Incident.

B. Temple Generation I STAFF

The incident response team consists of senior plant management, physical security specialists, network and control specialists, and applicable personnel. Other Temple Generation I business units, information technology, business analysts, and contractors may also be part of these teams depending on the issue and recovery required.

Position	Role	Responsibility
Plant Engineer	Recovery team lead	Lead recovery efforts
Operations Manager	Plant expert	Responsible for determining functionality of plant
Logic SME	Network expert	Responsible for restoring network
Shift Supervisor	Operations expert	Assist Plant Engineering and Operations Manager in assessment
Maintenance Manager	Crew Lead	Responsible for coordinating labor needs. Responsible for support of Incidents involving Physical Security
IT Manager/IT personnel	IT SME	Responsible for technical insight, device log collection, review, and preservation

C. VENDORS

CIP-related asset vendors may have an essential role in ensuring the CSIRT understands how to resolve or work around equipment failures and how to resume operations when necessary. CIP-related asset vendors may also be called upon for the supply of replacement software and hardware.

5. CYBER SECURITY INCIDENT RESPONSE PROCEDURE

A. IDENTIFICATION

Upon discovery of a potential Cyber Security Incident, immediately notify the On-Shift Operator. The On-Shift Operator shall then contact the Shift Supervisor, who will alert the CIP Sr. Manager and work with the organization's technical support staff or vendor to determine if there is a Cyber Security Incident or other issue affecting the system.

A Cyber Security Incident (CSI) is defined as a malicious act or suspicious event that compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter or, disrupts or was an attempt to disrupt, the operation of a BES Cyber System. The following conditions may indicate a CSI has occurred:

a. Routine systems monitoring detects a known or potential incident such as:

   i. Endpoint Protection alerts
   ii. Intrusion Detection System (IDS) alerts
   iii. Security Information and Event Management (SIEM) alerts
   iv. Policies changed (firewall, Group Policy Object (GPO), etc.)
   v. System hardening settings changed
   vi. Physical Security Perimeter breach

b. Unexplainable behavior of a BCS and/or BES Cyber Assets (BCAs) within a BCS.

c. Unexplainable loss of BCA or BCS functionality

d. Notification of a potential CSI by an external entity, including law enforcement, CERT or E-ISAC.

e. Notification of a potential CSI by an employee, contractor, or vendor.

B. ASSESSMENT AND CLASSIFICATION

Record the following information as applicable in the initial assessment and investigation on RCP-NERC-CIP-003-ATT-G. Please note that the following list is not exhaustive:

a. When, how, and by whom was the event reported (from Section 3.A)?
b. What system functionality is affected?
c. Are generation or transmission assets affected?
d. How many BCAs and/or BCSs are possibly affected?
e. Indicate results of log(s) examination on all access and monitoring devices and suspect systems.
f. Was unauthorized electronic and/or physical access gained?
g. Was there a compromise or disruption of one or more of reliability tasks? Reliability tasks are listed in Attachment B and defined in NERC Standard CIP-002-5.1a.

Based on the assessment above, the CSIRT shall classify the event as a Reportable CSI if the CSI has compromised or disrupted one or more reliability tasks of Temple Generation I.

If the CSI is determined to be Reportable (also review EOP-004 & DOE reporting requirements), then proceed to Section D, Communication Protocol, and initiate the reporting process, then return to Section C. Some incident types have a limited reporting window starting (within 1 hour) from when the CSI was determined to be reportable.

If the event is determined not to be a Reportable CSI, continue to document the investigation on the RCP-NERC-CIP-003-ATT-G, retain that form and any other evidence, and skip Section D.

C. RESPONSE AND INCIDENT HANDLING

The incident response process will be initiated when there is an event that requires further investigation. The CIP Senior Manager, Delegate(s) or assigned Incident Coordinator will assemble the CSIRT, initiate measures to contain the incident, implement measures to eradicate the threat and determine whether the incident is resolved or to implement device recovery.

i. <u>Containment</u>

Containment must be performed at the earliest possible stage to avoid cascading incidents. If the threat is internal from a compromised system or device, the device should be isolated from the network to reduce the threat to unaffected systems. If the threat is external such as an attempt to access the low impact physical security

area or electronic security area, steps should be taken to sever or block the external accessibility to the extent possible.

Prevent future electronic or physical access that could cause additional damage.
Engage internal and external support resources as needed.
If the event involved physical access to a PSP or system, investigate how access was obtained.
Reassess damage and capabilities of impacted systems per the Section B.
Engage local law enforcement as required. Phone numbers can be found in procedure RCP-NERC-EOP-004-3-ATT-A.

ii. Evidence Collection and Documentation

Document the identification, assessment and/or actions taken in response to the event. Examples may include any of the following:

Dated Documentation
Security Logs
Police Reports
Emails
Checklists
Forensic Analysis Results
Restoration Records
Post-Incident Review Notes
OE-417 Form
Document any deviations from the plan taken during the response.

iii. Data Preservation

Collection of information from the target system should be conducted in accordance with the appropriate forensic practices, where possible. Other relevant data that may correlate with the evidence of unauthorized access, including intrusion detection alerts and firewall logs, should be collected. Collected evidence should be securely stored.

Preserve records of electronic and physical access to the cyber assets
Data on disk drives of cyber assets shall be copied, mirrored, or replaced prior to recovering the asset where possible.
Configuration files of firmware based cyber assets shall be saved to a secure location.
Eyewitness accounts shall be documented.
Restoration of the BES and the safety of employees, contractors, and the public will take priority over the preservation of CSI data preservation.
Record chain of custody of all evidence collected.

iv. Eradication, Recovery and Resolution

Successful attackers frequently install root kits, which modify or replace system binaries and other files. Root kits hide much of what they do, making it tricky to identify what was changed.

If an attacker appears to have gained root access to a system:

a. Restore the system from a known good backup or reinstall the operating system and applications
b. Change all passwords on the system, and possibly on all systems that have trust relationships with the victim system

If an attacker only gains a lesser level of access than administrator-level, eradication and recovery actions should be based on the extent to which the attacker gained access.

D. COMMUNICATION PROTOCOL

Initial Identification Notification – Immediately upon detection of a possible CSI, notify the CIP Senior Manager or Delegate(s). Notifications may originate from any of the personnel listed in the CSIRT roles that receives alerts from applicable sources, including any employee or vendor who is entrusted with the responsibility of safeguarding the physical and/or cyber security of Temple Generation I's CIP-related Cyber Assets.

Vendor Support - If required, the CSIRT is responsible for initiating vendor support services. Such communication may be appropriate to enable a deeper investigation of the incident or resumption of services.

Required Reporting

a. E-ISAC & DOE

(1) Reporting an incident to DOE and E-ISAC is time sensitive, in some cases within one hour of determining a Reportable CSI. Reporting should be done using the Department of Energy OE-417 form. The form and instructions are found at the link below. The report can be submitted online directly to DOE and E-ISAC with a copy being emailed back to the originator (for documentation and forwarding to additional reporting recipients, if necessary). If emailing the form, apply encryption if necessary.

http://www.nerc.com/pa/CI/ESISAC/Pages/Report-an-Incident.aspx

(2) Ongoing communication with DOE and E-ISAC will be coordinated through the CIP Sr. Manager or Delegate.

Texas RE

The CIP Senior Manager or Delegate(s) will submit or direct submission of the same DOE Form OE-417, to the Regional Entity via email as required.

b. Electric Reliability Council of Texas, Inc., Electric Reliability Council of Texas, Inc. and ERCOT / ONCOR

Operating personnel on duty will make notifications to the other parties in the interchange via phone or email as directed by the CIP Sr. Manager

6. EVIDENCE RETENTION

Temple Generation I will retain data or evidence to show compliance with each requirement for three calendar years unless directed by its Compliance Enforcement Authority ("CEA") to retain specific evidence for a longer period.

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 8**	Subject: **Physical Security Incident**	
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1. PURPOSE

The purpose of this procedure is to describe the plan for responding to physical security incidents at Temple Generation I, LLC. This document will outline how to detect and react to physical security incidents, determine their scope and risk, respond appropriately and quickly, and communicate the results and risks to appropriate parties.

2. SCOPE

This incident response plan applies to all employees, contractors, clients and visitors of Temple Generation I, LLC. This plan does not cover cybersecurity incidents or data breaches. For information about responding to incidents involving information systems and networks of Temple Generation I, LLC., see Section 7 Cybersecurity Incident.

3. DEFINITIONS & EXAMPLES

An incident is an event that violates the policies, standards or Code of Conduct of Temple Generation I, LLC. or that threatens the safety and well-being of Temple Generation I, LLC. employees, contractors, or visitors.
Examples of incidents include:

- Unauthorized breach of Temple Generation I physical property, fence lines, gates, etc.
- Workplace accidents and injuries
- Health and safety incidents
- Near misses
- Physical security breaches (e.g. break-ins)
- Workplace violence

4. RESTRICTING PHYSICAL ACCESS

4.1 Temple Generation I, LLC has defined a number of operational and procedural controls to restrict physical access to the perimeters and buildings.

4.1.1 Security fencing with gates and locks
4.1.2 A 24 hour/7 day staffed guard at the main gate that monitors all plant traffic and tracks vendors and visitors.
4.1.3 A card reading system for the control room limiting access for non-essential contractors.
4.1.4 Fence lines and entry points under 24/7 video camera surveillance.

5. ROLES & RESPONSIBILITIES

5.1 Employees are responsible for:

5.1.1 abiding by Temple Generation I, LLC. safety and security policies and procedures.

5.1.2 reporting incidents in accordance with the guidelines in Temple Generation I, LLC. safety and security policies and procedures

5.1.3 attending periodic training on Temple Generation I, LLC. physical security incident response plan, as well as on safety and security issues in the workplace.

5.2 Managers are responsible for:

5.2.1 promoting a safe work environment

5.2.2 taking every reasonable measure to protect their employees

5.2.3 providing Temple Generation I, LLC. safety and security policies and procedures to their employees.

5.2.4 assisting with investigations if required

5.2.5 reporting incidents in accordance with the guidelines in Temple Generation I, LLC. safety and security policies and procedures

5.1 The Incident Response Team is responsible for:

5.3.1 notifying persons of potential risks

5.3.2 monitoring the implementation of this incident response plan

5.3.3 leading risk assessments and root cause analyses

5.3.4 leading employee training on this incident response plan as well as on safety and security issues in the workplace

5.3.5 reviewing this incident response plan on a periodic basis

5.3.6 responding to all incidents where immediate assistance is required, taking steps to mitigate immediate risks and notify emergency services if required

5.3.7 conducting an initial investigation of all incidents, taking steps to mitigate immediate risks and develop safety plans for affected individuals if necessary

5.3.8 assisting with incident investigations

5.3.9 liaising with law enforcement agencies and participating in legal processes if required

6. INCIDENT RESPONSE STAGES & PROCEDURE

6.1 Stage 1: Preparation

6.1.1 develop and review Temple Generation I, LLC. policies and procedures

6.1.2 train employees on Temple Generation I, LLC. policies and procedures

6.2 Stage 2: Detection

6.2.1 discover incident through tips or reports

6.2.2 discover incident using security tools or other detection strategies

6.2.3 complete Temple Generation I, LLC. incident reporting as required

6.2.4 declare and classify the incident

6.1 Stage 3: Containment

6.1.1 identify, isolate and/or mitigate risks associated with the incident

6.1.2 notify affected parties

6.1.3 decide whether or not to investigate incident

6.1.4 preserve physical and/or digital evidence

6.1 Stage 4: Investigation

6.1.1 determine the incident's priority, scope and root cause

6.1.2 collect physical and/or digital evidence

6.1.3 conduct interviews with complainants and/or persons involved

6.1 Stage 5: Remediation

6.1.1 repair affected systems (if applicable)

6.1.2 communicate to and instruct affected parties about next steps

6.1.3 confirm that the threat has been contained

6.1.4 file formal reports as per regulatory requirements (if applicable)

6.1.5 create of post-incident report

6.1 Stage 6: Recovery

6.1.1 analyze the incident for its procedural and policy implications

6.1.2 gather metrics

6.1.3 review and edit established policies and procedures with lessons learned from the incident

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 9**	Subject: **Water Shortage**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatempletx.com, c=US Date: 2022.04.12 10:59:08 -05'00'	Current Issue: **REV 0**	Issue Date: **April 12, 2022**

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1. Purpose

The purpose of this procedure is to provide guidance on actions to be taken in the event of a raw water supply interruption that could impact the generation capability of the Temple Generation I, LLC facility.

2. Definitions

For the purpose of this procedure, Water Shortage would imply an interruption of raw water delivery (reclaimed wastewater) to the Temple Generation I facility raw water storage pond along with the failure of the City of Temple/Belton to maintain the raw water pond at the desired normal level.

3. Communications

3.1 Upon discovery of an unintentional loss or unexpected reduction in available raw water supply to the Temple Generation I raw water pond, plant staff shall notify the City of Temple/Belton wastewater treatment plant and the Temple Operations Manager as soon as practical to investigate the cause.

3.2 If the cause of the loss or reduction of raw water flow is determined to be caused by issues outside the operational control of the Temple Generation I facility, Plant Management shall maintain communications with the City of Temple/Belton wastewater treatment plant Management Staff to determine the cause of the interruption.

3.3 Once a cause of the interruption has been identified, the expected duration of the interruption should be determined and discussed with the City of Temple/Belton. The duration of the supply interruption should be evaluated to determine if plant generation could be impacted.

3.4 Once the risk to the facility is known this risk should be communicated to the BKV-BPP JV Corporate Management Team and the Qualified Scheduling Entity.

3.5 As updates become available the Plant Management Team shall routinely update the BKV-BPP JV Corporate Management Team and the QSE until raw water supply has been restored and on-site storage has been restored to normal levels.

4. Actions

4.1 Initial Actions shall be to investigate and determine the cause of the loss or reduction of raw water delivery to the Temple Generation I raw water pond.

4.2 Once cause of interruption has been determined, the duration of the interruption must be understood to perform an evaluation of Raw Water inventory on site to evaluate risk to the facility.

4.3 In coordination with the City of Temple/Belton, efforts shall be made to restore raw water availability as soon as practical. A determination should be made if the City of Temple/Belton's potable water system could supplement Temple's raw water inventory until the raw water deliveries can be restored.

Potable water flow can be routed directly to the cooling tower, the fire/service water storage tank or the demineralization system.

4.4 Raw water conservation should be considered in the event the raw water supply interruption is expected to impact the plant generation capability. Conservation alternatives that should be considered would be:

Reduction of duct burner operation during off-peak hours or all hours.

Reduction of Combustion Turbine Evaporative Cooler operation.

Implementation of plant cycling operation to reduce off-peak operation.

4.5 When raw water supply has been restored to the Temple Generation I Facility, Temple Operations Plant Management will communicate the resolution to the Qualified Scheduling Entity and coordinate restoration from any water conservation efforts and generation derates.

Temple Generation I, LLC	Emergency Operations Plan	
Number: **Section 10**	Subject: **EOP Compliance Requirements**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatemplepx.com, c=US Date: 2022.04.12 10:59:36 -05'00'	Current Issue: **REV0**	Issue Date: **April 12, 2022**

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1. PURPOSE

The purpose of this section is to provide guidance to maintaining compliance with Texas Administrative Code Rule §25.53 Electric Service Emergency Operations Plans, including but not limited to, the requirements for reviews an updates, training, drills, and affidavits.

2. REVIEWS & UPDATES

2.1 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:

2.1.1 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 file with the PUCT and executive summary that:

2.1.1.1 describes the changes to the contents or policies contained in the EOP

2.1.1.2 includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.3 includes the record of distribution required under Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.4 contains the affidavit required under Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.5 file with the PUCT a complete, revised copy of the EOP with all confidential portions removed

2.1.1.6 submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.

2.1.2 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 PUCT:

2.1.2.1 a pleading that documents any changes to the list of emergency contacts as provided under Rule §25.53 Electric Service Emergency Operations Plans

2.1.2.2 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

2.1.2.3 the affidavit required by Rule §25.53 Electric Service Emergency Operations Plans

2.1.3 An Entity must update its EOP, or other documents required if PUCT 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 and emergency. If directed by PUCT staff, the entity must file its revised EOP or other documentation, or a portion thereof, with the PUCT and, for entities

with operations in the ERCOT power region, with ERCOT.

3. RECORD OF DISTRIBUTION

3.1 A record of distribution contains the following information in table format:

3.1.1 titles and names of persons in the entity's organization receiving access to and training on the EOP

3.1.2 dates of access to or training on the EOP, as appropriate.

4. EMERGENCY CONTACTS

An entity must file with the PUCT a list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent request and questions from the PUCT during an emergency.

5. AFFIDAVITS

5.1 An affidavit must be signed by the highest-ranking representative, official, or officer with binding authority affirming that the items in 25.53(c)(4)(C) are met.

5.2 The affidavit must affirm the following:

5.2.1 relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP

5.2.2 personnel have been 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

5.2.3 the EOP has been reviewed and approved by the appropriate executives

5.2.4 drills have been conducted to the extent required by Rule §25.53 Electric Service Emergency Operations Plans

5.2.5 the EOP or an appropriate summary has been distributed to local jurisdictions as needed

5.2.6 the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident

5.2.7 the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management official during emergency events have received the lates IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

6. DRILLS

6.1 An entity must conduct or participate in at least one drill each calendar year to test its EOP.

6.2 Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed.

6.3 An entity conducting an Annual Drill must, at least 30 days prior to the date of at least one drill each calendar year, notify PUCT staff, using the method and form prescribed by PUCT staff on the PUCT website, by email or other written form, of the date, time, and location of the drill.

6.4 An entity that has activated its EOP in response to an emergency is not required, under Rule §25.53 Electric Service Emergency Operations Plans, to conduct or participate in a drill in the calendar year in which the EOP was activated.

7. REPORTING

7.1 Upon request by PUCT 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.

7.2 Updates must continue until all incident related outages of customers able to take service are restored or unless otherwise notified by PUCT staff.

7.3 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.

8. TRAINING

8.1 Relevant operating personnel must receive training on the applicable contents and execution of the EOP and subsections.

8.2 An entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events must have received the latest IS-100, IS-200, IS-700, IS-800 National Incident Management System training.

Temple Generation I LLC	Emergency Operations Plan	
Number: **Section 11**	Subject: **Revision History Log**	
Approved for Use by: Sean Hausman Digitally signed by Sean Hausman DN: cn=Sean Hausman, o=Temple Power, ou=Panda Temple Power Station, email=shausman@pandatempletx.com, c=US Date: 2022.04.12 11:00:01 -05'00'	Current Issue: **REV0**	Issue Date: **April 12, 2022**

Rev.	Date	Description	By Initials	Approval Initials
0	04/12/2022	Rev. 0 for compliance with revised Rule 25.53	WAP	SEH
1				
2				
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