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April 18, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Texas
Filing Clerk/Central Records
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100 Austin, Texas 78701

Re: 16 Tex. Admin. Code ("TAC") § 25.53, "Electric Service Emergency Operations Plans"

I. Emergency Operation Plan Executive Summary

In accordance with 16 Tex. Admin. Code ("TAC") § 25.53, "Electric Service Emergency Operations Plans," HEN Infrastructure, L.L.C. ("HEN Infrastructure"), a registered Power Generation Company ("PGC"), is submitting its updated Emergency Operations Plan ("EOP"). HEN Power Marketing L.L.C. ("HEN PM") is the manager and operator of HEN Infrastructure and is responsible for maintaining and implementing the EOP. All operational functions, including emergency response, are provided to HEN Infrastructure by HEN PM's Network Optimization Center ("NOC"). [redacted]

HEN PM maintains an Emergency Operations Plan for HEN Infrastructure in anticipation of a natural disaster or situations involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts.

The plan includes sections that will ensure that HEN PM personnel understand processes and procedures in advance of predictable emergencies and how key roles and responsibilities will be assigned and performed during emergency events and situations.

Specifically, this plan was developed for the following reasons:

- To provide the structure and processes to guide the organization during all types of emergency conditions and situations.

- To establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing the HEN PM's human and physical resources, and if necessary, by securing and utilizing outside resources.

- To ensure that each PGC is compliant with the regulatory requirements related to emergency operations and emergency response.

The Emergency Operations Plan for HEN Infrastructure include additional operating procedures because HEN PM's operating facilities are located in [redacted], a designated hurricane evacuation zone. HEN PM most recently conducted hurricane preparedness drills in conjunction with ERCOT on September 8-9, 2021. As such, HEN PM will conduct its hurricane plan on an annual basis on or about the first week of September and will notify commission staff and TDEM District Coordinators, in accordance with EOP requirements.

II. Table Reference

For ease of review, the below table identifies the specific sections and page numbers of the EOP that correspond with the requirements of §25.53

§25.53 Applicable Rule	EOP Section Title	EOP Page
§25.53(d)(1) (B), (C), (D), and (E)	Plan Approvals	3
§25.53(d)(1)(A)	Purpose and Overview	5
§25.53(b)	Definitions	6
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§25.53(d)(6)	Annexes	
§25.53(e)(2)(A)	Weather Emergency Annex	11
§25.53(e)(2)(A)(i)	Hot and Cold Weather Emergency	12-15
§25.53(d)(5)	Identification of Potentially Severe Weather	16
§25.53(d)(3)	Inventory of Supplies	17
§25.53(d)(4)	Emergency Response Staffing	18
§25.53(e)(2)(A)(iii)	Emergency Checklist	19
§25.53(e)(2)(B)	Water Shortage Annex	20
§25.53(e)(2)(C)	Restoration of Service Annex	22
§25.53(e)(2)(D)	Pandemic and Epidemic Annex	24
§25.53(e)(2)(D)	Hurricane Emergency Annex	26
§25.53(e)(2)(E)	Cyber Security Annex	29
§25.53(e)(2)(F)	Physical Security Incident Annex	34
§25.53(c)(4)(A)	Appendices	37

The below table identifies the specific sections and page numbers of the Executive Summary that correspond with the requirements of §25.53

§25.53 Applicable Rule	Executive Summary Section Title	Executive Summary Page
§25.53(c)(1)(A)(i)(a)	I. Emergency Operation Plan Executive Summary	1
§25.53(c)(1)(A)(i)(b)	II. Table Reference	3-4
§25.53(c)(1)(A)(i)(c) & §25.53(c)(4)(A)(i) & §25.53(c)(1)(A)(ii)	III. Record of Distribution	5-7
§25.53(c)(1)(A)(i)(d) & §25.53(c)(4)(C)	IV. Affidavit	8-9
§25.53(c)(4)(C)(i)	IV. Affidavit	8-9
§25.53(c)(4)(C)(ii)	IV. Affidavit	8-9
§25.53(c)(4)(C)(iii)	IV. Affidavit	8-9
§25.53(c)(4)(C)(iv)	IV. Affidavit	8-9
§25.53(c)(4)(C)(v)	IV. Affidavit	8-9
§25.53(c)(4)(C)(vi)	IV. Affidavit	8-9
§25.53(c)(4)(B)		8-9

III. Record of Distribution

EOP Distribution List			
Name	**Title**	**E-Mail**	**Date of Receipt**
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
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[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022

[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022

EOP Training List

Name	Title	E-Mail	Phone	Date of Training
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
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[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022

[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022

HEN Emergency Contacts				
Name	**Department**	**Office**	**Alternative**	**Email**
HEN Operations Desk (Primary) - Houston	NOC Operations	281.990.1173	214.978.8880	NOC@huntenergy.com
[redacted] (Secondary)	[redacted]	281.990.1173	[redacted]	[redacted]
HEN Emergency Point of Contact for PUC Urgent Requests and Questions				
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

IV. Affidavit

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

"My name is Pat Wood, III. I am the Chief Executive Officer of HEN Power Marketing, L.L.C., which is the manager of HEN Infrastructure, L.L.C. ("HEN Infrastructure"). My business address is 1900 N. Akard St., Dallas, TX 75201. I am the highest-ranking officer with binding authority over each of HEN Infrastructure. I swear or affirm that I have personal knowledge of the facts set forth in this Affidavit. I am over 18 years of age and competent to make this affidavit.

HEN Infrastructure has an Emergency Operation Plan ("EOP"), prepared in accordance with Public Utility Commission of Texas Subst. Rule §25.53(c) ("Substantive Rule"). I attest and affirm that each of the following are true and accurate:

1. All relevant operating personnel are familiar with and have received training on the contents and execution of the EOP, and such personnel are instructed to follow the EOP except to the extent deviations are appropriate under the circumstances, during the course of an emergency.

2. The EOP has been reviewed and approved by the appropriate executives.

3. Drills required under the Substantive Rule were conducted on September 8-9, 2021 and will be conducted annually on or about that subsequent date to test the EOP, unless the EOP has been activated in response to an emergency prior to the test.

4. HEN Infrastructure maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

5. The emergency management personnel who are designated by HEN Infrastructure to interact with local, state, and federal emergency management officials during emergency events have received National Incident Management System training, specifically IS-700.a, IS-800.b, IS-100.b, and IS-200.b

Pat Wood, III
Chief Executive Officer
HEN Infrastructure, L.L.C., by
HEN Power Marketing, L.L.C.,
It's Manager

Hunt ENERGY NETWORK

SUBSCRIBED AND SWORN TO BEFORE ME, a Notary in and for the State of Texas, this 18th day of April 2022.

Notary Public in and for the State of Texas

My Commission Expires: 7/30/25

LAURIE ANN SCHUMANN
Notary ID #133244586
My Commission Expires
July 30, 2025

V.

HEN Infrastructure, L.L.C.

Emergency Operations Plan

April 1, 2022

CONFIDENTIALITY NOTICE

This document, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, copy, use, disclosure, or distribution is prohibited.

PLAN APPROVALS

The Emergency Operations Plan (EOP or "Plan") was developed for HEN Infrastructure, L.L.C. ("HEN Infrastructure") to provide a clear guide for all phases and types of emergency operations and to ensure compliance with all applicable regulatory requirements.

This plan is a living document and will be reviewed and updated on a regular basis. The Regulatory Manager is responsible for coordinating these systematic updates, while Operational Managers are responsible for specific operational plan updates.

Function	Responsible Party
1. EOP Coordination	Manager of Compliance & Markets
2. Asset Operational Manager	Director of Operations
3. Network Optimization Manager	Network Optimization Manager

*Note – Each approved / active version of the Plan remains in effect until replaced / superseded by an updated and approved version. The EOP, dated 4/01/2022, supersedes previous EOPs.

Revision History			
Version	Date	Update	Performed By
0	11/20/2020	First Publication	[redacted]
1	06/21/2021	Updated Corporate Name	[redacted]
2	04/01/2022	Updated per Commission Project 51841 - REVIEW OF 16 TAC § 25.53	[redacted]

PLAN INDEX / TABLE OF CONTENTS

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PURPOSE AND OVERVIEW

The purpose of this document is to provide management and personnel with the information needed to manage an emergency. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Substantive Rule §25.53.

HEN Infrastructure maintains an Emergency Operations Plan in anticipation of natural disaster or situations involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts.

The plan includes sections that will ensure that personnel understand what to do in advance of predictable emergencies and how key roles and responsibilities will be assigned and performed during emergency events and situations.

Specifically, this plan was developed for the following reasons:

- To provide the structure and processes to guide the organization during all types of emergency conditions and situations.
- To establish procedures for the restoration of facility capacity in a systematic and efficient manner by effectively utilizing the HEN Infrastructure's resources, and if necessary, by securing and utilizing outside resources.
- To ensure that HEN Infrastructure is compliant with the regulatory requirements related to emergency operations and emergency response.

DEFINITIONS

1. Annex - a section of an emergency operations plan (EOP) that addresses how an entity plans to respond in an emergency involving a specified hazard or threat.

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. Emergency - any incident resulting from an imminent hazard or threat that endangers life or property or presents credible risk to the continuity of electric service. The term includes an emergency declared by local, state, or federal government; Electric Reliability Council of Texas (ERCOT); or a Reliability Coordinator that is applicable to the entity.

4. 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.

5. 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.

ACTIVATION OF EMERGENCY OPERATIONS PLAN

This plan provides structure, procedures and tasks related to HEN Infrastructure's response to all types of possible emergencies and gives the NOC Manager the responsibility and discretion to declare a situation, event, or incident as an "Emergency".

This plan ensures that there are clear roles and responsibilities for each emergency event. At the discretion of the Director of Operations, the Solutions Team may be engaged to assist with the HEN Infrastructure coordination and recovery efforts. The Solutions Team is comprised of personnel listed in the Appendix.

- **Pre-Emergency Preparation**
  - The NOC Manager shall designate an emergency event as one of the types and levels of emergencies listed below and shall communicate to HEN PM leadership and operational teams when it has designated an Emergency Event and activated this EOP.
  - HEN Infrastructure conducts normal business while individuals responsible for emergency preparation tasks initiate preparatory tasks.
  - Typically lasts up to 24-72 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.
  - An Event Manager will be designated by the Director of Operations, in conjunction with the NOC Manager. The Event Manager will be dispatched to the site to define and ensure the appropriate HEN response and coordinate with both the Director of Operations and NOC Manager, arranging event defined communication and support services.

- **Significant Event(s)**
  - The emergency event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric generation service in one or more area of the facility, with power being restored to all areas within 24 hours).
  - An Event Manager will be designated and dispatched to the site by the Director of Operations, in conjunction with the NOC Manager. The Event Manager will be dispatched to the site to define and ensure the appropriate HEN response and coordinate with both the Director of Operations and NOC Manager. Additionally, the Director of Operations will identify the HEN Infrastructure management and/or staff personnel to fill all or some of the emergency roles as necessary (Operations/Restoration, Logistics, Finance/Administration, Technology, and Communications).

- **Major Event(s)**
  - A segment of HEN Infrastructure has experienced a power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal field work.
  - Major events are expensive and can include problems like loss of critical components of

the electric generator infrastructure such as substations, transmission assets, generators, and other equipment that could include loss of HEN Infrastructure's ability to conduct business.

- An Event Manager will be designated and dispatched to the site by the Director of Operations, in conjunction with the NOC Manager. The Director of Operations will determine if other roles are required. Additionally, the Director of Operations will identify the HEN Infrastructure management and/or staff personnel to fill all or some of the emergency roles as necessary (Operations/Restoration, Logistics, Finance/Administration, Technology, and Communications).
- It is likely that two or more personnel will be required to fill each role due to the extended nature of the emergency event.

- **Catastrophic Event(s)**
  - A Catastrophic event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster, or the NOC is lost for an extended period.
  - The organization must have systems in operation within 72 hours or experience significant economic loss.
  - An Event Manager will be designated and dispatched to the site by the Director of Operations, in conjunction with the NOC Manager. The Director of Operations will determine if other roles are required. Additionally, the Director of Operations will identify the HEN PM management and/or staff personnel to fill all or some of the emergency roles as necessary (Operations/Restoration, Logistics, Finance/Administration, Technology, and Communications).
  - It is likely that two or more personnel will be required to fill each role due to the extended nature of the emergency event.

- **Recovery**
  - After an emergency event, the organization will require a time period to return to normal operations.
  - The NOC Manager will work with the Solutions Team to organize the recovery tasks, reporting tasks and other related operational and business actions required for the full recovery of the system and operations.

COMMUNICATION PLAN

Media, Local and State Entities and Officials

Overall responsibilities related to communications are to provide prompt and continual emergency information to the public and the media, if needed, and to elected and appointed governmental officials. These responsibilities are provided by the Vice President, Hunt Consolidated Inc. (HCI) Public Affairs and include:

1. Coordinate with HEN PM Operations and Regulatory Departments to make available to the public and the media, if needed, any available information concerning the severity of damage and the status of repairs.
2. Use radio, television, newspapers, or the Internet to relay all informationin a timely manner.
3. Provide information to, and timely respond to inquiries from, any federal, state and local officials including the Texas Office of the Governor, Public Utility Commission of Texas, and the Office of Public Utility Counsel.

ERCOT and Transmission & Distribution Service Provider (TDSP) Operation Centers

The HEN PM NOC's overall responsibility is to monitor real-time events and communicate with the appropriate internal and external entities should an emergency condition arise. The NOC maintains a direct line of communication to ERCOT through the use of the system Wide Area Network (WAN) and can relay operational status within a moment's notice. In addition, the NOC maintains a list of direct connecting phone numbers to the operations centers of TDSPs with which HEN Infrastructure assets are interconnected. Upon activation of the EOP, the HEN NOC will contact ERCOT and each TDSP Operations Center, relaying the appropriate information regarding the emergency. The NOC will maintain contact and provide updates to reach respective operator until such time the EOP is deactivated and there is a resumption of normal activities.

Emergency Organizations

The Appendix to this EOP includes a list with contact information of the police, sheriff, and emergency management organizations within the operating areas. This list is also maintained at the NOC and the NOC will communicate with those organizations as needed.

LIST DIRECTORY

Having current lists of emergency contacts and other emergency information is an important aspect of an emergency operations plan. All HEN Infrastructure systems are remotely monitored by the NOC. Emergency responses will be activated by and will originate from the NOC, as well as engaging and coordinating the Solutions Team as necessary. Solutions Team and HEN 24x7contact information are included in the Appendix Section(s) of this document.

Note 1: All lists / contact information will be collected by the NOC Manager

Note 2: The HEN Infrastructure "Contact Person" for each list is provided below.

List	Responsible Party
1. HEN Infrastructure Organization	NOC Manager
2. Governmental Agencies	HCI Public Affairs and HEN PM Regulatory
3. Communication / IT Vendors	Director of Operations
4. Contractors	Director of Operations
5. Local, Regional Utility Contacts, First Responders	NOC Manager

WEATHER EMERGENCY ANNEX

SUBST.R. §25.53(e)(2)(A)
COLD WEATHER EMERGENCY PLANS*

Purpose and Applicability

To identify and formulate a counterplan for any known critical failure points with the generation facility equipment as it relates to a cold weather emergency.

*This section was prepared in accordance with the Public Utility Commission of Texas ("PUC") Substantive Rule §25.53.

Fuel Switching

Energy storage facilities are charged utilizing grid supplied electricity and will not accept alternative fuels. In the event of a grid scale outage, auxiliary equipment (protection equipment controls, climate control equipment, energy management system, etc.) may be energized through an external power generating resource.

Checklist

Initial Tasks

- Identification of critical temperature thresholds.
    - Each storage unit has an external ambient operational range from -20°C (-4°F) to +45°C (113°F). Additionally, these units are sealed from external environments in a NEMA3 rated enclosure and operate in a self-conditioned space.

Ongoing Maintenance

- The cold weather will be continuously monitored in advance and in real-time.
- Preventative maintenance activities are typically performed twice a year, or more, on each storage unit.

Pre-Event Tasks

- Compare equipment operating thresholds to temperature forecasts.
- Perform weatherization procedures as applicable for the specific season and per manufacturers recommendations.
- The NOC continuously monitors ambient operating temperature limits in advance of anticipated severely cold weather events, including impacts to potential generation levels.
- Review lessons learned from past cold weather emergency incidents and to ensure necessary supplies and personnel are available through the winter emergency.

Plan

- HEN Infrastructure storage facilities are designed to remain operational during severely cold weather. Weather monitoring and telemetry systems are in place to communicate, in advance and in real-time, the extreme weather effects on storage

operations to the NOC. Additionally, station equipment checks are performed periodically to verify weather readiness. Any defects that are discovered through preventative and routine maintenances should be immediately remedied.

- HEN PM maintains the NOC at a primary location in [redacted] and in a back-up location [redacted] Should severe weather or other hazards or threats affect the ability of NOC staff to operate HEN Infrastructure managed facilities, NOC staff will enable the Extreme Weather Emergency Operating Procedures (see Appendix) and restart operations in the back-up operations center.
- Should any remotely operated plant cease to function due to a physical component failure, the NOC Manager (or their designee) will coordinate with the Direction of Operations (or their designee) to repair the component in a timely fashion.

Post-Event Tasks

- Review post emergency actions to develop lessons learned from cold weather emergency incident and to ensure necessary supplies and personnel are available through the next winter emergency.
- Record all post emergency actions in lessons learned log, to be maintained by Director of Operations or his designee.

SUBST.R. §25.53(e)(2)(A)
HOT WEATHER EMERGENCY PLANS*

Purpose and Applicability

To identify and formulate a counterplan for any known critical failure points with the generation facility equipment as it relates to a hot weather emergency.

*This section was prepared in accordance with the Public Utility Commission of Texas ("PUC") Substantive Rule §25.53.

Checklist

Initial Tasks

- Identify critical temperature thresholds.
    - Each storage unit has an external ambient operational range from -20°C (-4°F) to +45°C (113°F). Additionally, these units are sealed from external environments in a NEMA3 rated enclosure and operate in a self-conditioned space.

Ongoing Maintenance

- The Severely Hot Weather will be continuously monitored in advance and in real-time.
- Preventative maintenance activities are typically performed twice a year, or more, on each storage unit.

Pre-Event Tasks

- Perform weatherization procedures as applicable for the specific season and per manufacturers recommendations.
- The NOC continuously monitors ambient operating temperature limits in advance of anticipated severely hot weather events, including impacts to potential generation levels.
- Review lessons learned from past hot weather emergency incidents and to ensure necessary supplies and personnel are available through the winter emergency

Plan

- HEN Infrastructure facilities are designed to remain operational during severely hot and cold weather. Weather monitoring and telemetry systems are in place to communicate, in advance and in real-time, the extreme weather effects on storage operations to the NOC. Additionally, station equipment checks are performed periodically to verify weather readiness. Any defects that are discovered through preventative and routine maintenances should be immediately remedied.
- The HEN PM maintains primary and back-up operations centers. Should severe weather or other hazards or threats affect the ability of NOC staff to operate HEN

Infrastructure managed facilities, NOC staff will enable the Extreme Weather Emergency Operating Procedures and restart operations in the back-up operations center.

- Should any remotely operated plant cease to function due to a physical component failure, the NOC Manager (or their designee) will coordinate with the Direction of Operations (or their designee) to repair the component in a timely fashion.

Post-Event Tasks

- Review post-event actions to develop lessons learned from cold weather emergency incident and to ensure necessary supplies and personnel are available through the next winter emergency.
- Record all post emergency actions in lessons learned log, to be maintained by Director of Operations or his designee.

PUC SUBST. R. §25.53(d)(5)
IDENTIFICATION OF POTENTIALLY SEVERE WEATHER*

Purpose and Applicability

To maintain real-time awareness of the prevailing weather and of developing weather events that may have an impact on the normal operations of HEN Infrastructure facilities.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule §25.53.

Initial Tasks

- Identify critical temperature thresholds
- Identify wind speed thresholds
- Identify any other critical weather events

Ongoing Maintenance

- The NOC continuously monitors all major weather events, utilizing primary weather service providers and embedded telemetry systems.

Pre-Event Tasks

- Monitor and report weather / fire danger information to HEN PM Operations personnel.

Plan

- If functional, operational, or other defects are detected or discovered at any time at any of its facilities, HEN PM personnel can troubleshoot and repair immediately. The storage units are designed to operate in normal temperatures ranging from -20°C (-4°F) to +45°C (113°F). Additionally, these units are sealed from external environments in a NEMA3 rated enclosure and operate in a self-conditioned space. Severe wind and icing events can, however, impact the interconnecting balance of plant. If a storage unit is subjected to icing or winds, remote personnel will monitor the operation of the storage units and balance of plant for any potential failures.
- The HEN PM maintains primary and back-up operations centers in [redacted], respectively. NOC staff will evaluate severe weather or other threats and project whether primary NOC will be impacted. NOC staff will enable the Extreme Weather Emergency Operating Procedures and restart operations in the back-up operations center should staff determine relocation is the best course of action.

PUC SUBST. R. §25.53(d)(3)
INVENTORY OF PRE-ARRANGED SUPPLIES*

Purpose and Applicability

To provide guidelines for the procurement, storage and maintenance of supplies that HEN Infrastructure may need during an emergency event.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule §25.53.

Initial Tasks

- HEN Infrastructure has established and will maintain an Operations and Maintenance ("O&M") contract for time and materials that provides HEN Infrastructure personnel (and contractors) with sufficient supplies to support emergency operations during all types and levels of emergency event(s). The Director of Operations, contractors, and suppliers and will develop a process to procure and maintain supplies that may be needed during emergency events.

Ongoing Maintenance

- The HEN PM Director of Operations or his designee will maintain and share the up-to-date inventory list with the O&M contractor.
- The inventory list will include various components of the HEN Infrastructure electrical infrastructure.

Pre-Event Tasks

- Monitor and report weather / fire danger or other hazard or threat information to HEN PM Operations personnel

Plan

- If functional, operational, or other defects are detected or discovered at any time at any of its facilities, HEN Infrastructure can promptly troubleshoot and repair. The storage units are designed to operate in normal temperatures ranging from -20°C (-4°F) to +45°C (113°F). Additionally, these units are sealed from external environments in a NEMA3 rated enclosure and operate in a self-conditioned space. Severe wind and icing events can, however, impact the interconnecting balance of plant. If a storage unit is subjected to icing or winds, remote personnel will monitor the operation of the storage units and balance of plant for any potential failures.

PUC SUBST. R. §25.53(d)(4)
STAFFING DURING SEVERE WEATHER EVENTS PLAN*

Purpose and Applicability

To provide the roles and assignments for the HEN PM personnel for all types of potential emergency situations. The tasks listed below will be assigned to and or delegated by the Director of Operations.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule §25.53

Initial Tasks

- Identify personnel able to fulfill staffing needs during an emergency.
- Identify subcontractors able to aid during an emergency.

Ongoing Maintenance

- The Director of Operations will review the tasks to ensure they are up to date with the latest industry best practices.

Pre-Event Tasks

- Monitor the predicted severe weather or hazards or threats expected to impact the HEN Infrastructure facility and communicate the possible event with site staff.
- Notify the identified personnel able to fulfill staffing needs for the possible emergency.
- Notify subcontractors that can aid with the possible emergency.

Plan

- NOC Operators are the first line of defense prior to an emergency event. The primary method for control of the HEN Infrastructure facilities during emergency events is via remote operations. During severe weather events, personnel are to take the appropriate safety precautions. Additionally, HEN PM utilizes local contractors for HEN Infrastructure plant maintenance and troubleshooting. In the event of plant interruption, subcontractors will be dispatched to the site to address disruptions caused by severe weather.

PUC SUBST. R. §25.53(e)(2)(a)(iii)
CHECKLISTS FOR GENERATING FACILITY PERSONNEL TO ADDRESS EMERGENCY EVENTS*

Purpose and Applicability

To provide a checklist for generating facility 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. The tasks listed below will be assigned to and/or delegated by the Director of Operations.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule §25.53

Emergency Event Checklist

A monthly site inspection is conducted to make sure the maintenance is both proactive and corrective to maximize BESS output and ensure uninterrupted operation.

Documentation of inspection includes:

- Inspector(s) on Site, Pre and Post Weather Check, & Date and Time of Inspection
    - Project Site
        - Site Access
        - Fencing/ Gate(s)
        - Locks
        - Vegetation
        - Pest Damage
        - Spare Parts
    - Battery Stacks & Enclosure
        - Temperature Checks
        - General Appearance/ Physical Damage
        - LED Indicators
    - HVAC
        - Air Filters
        - Condenser
        - Evaporator Coil
        - Drain System
    - Communication Network
        - HMI Output Verification
        - Alarm Functionality
        - Communication with Operations
    - Spare Parts Inventory
    - Photo Documentation
    - Summary of Issues/Concerns

WATER SHORTAGE OR DROUGHT ANNEX

PUC SUBST. R. §25.53(e)(2)(B)
WATER SHORTAGE OR DROUGHT ANNEX*

Rule 25.53(e)(2)(B) requires a Power Generation Company ("PGC") to include in its emergency operations plan "a water shortage annex that addresses supply shortages of water used in the generation of electricity" This provision does not apply to HEN Infrastructure as the storage facilities do not rely on water to operate.

RESTORATION OF SERVICE ANNEX

PUC SUBST. R. §25.53(c)(2)(J)
RESTORATION OF SERVICE ANNEX*

Purpose and Applicability

To establish a plan for the priorities for recovery of generation capacity.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule §25.53.

Initial Tasks

- Identify processes to properly bring generation back on-line.

Ongoing Maintenance

- The inventory list will be reviewed as necessary.
- Standing relationships with industry-specific transient workforce resources will be maintained.

Pre-Event Tasks

- Ensure primary communications channels and any backup communication channels between the NOC and the site are active.
- Review parts availability and establish plan for mobilization of major component replacement teams based on the cause of the emergency.
- Review available labor resources and send notifications regarding the possible need for transient labor resources.

Plan

- Facilities are continuously monitored from the NOC. Following disruption of operations, NOC personnel will review the operating status of generation facilities through remote operations and coordinate with the applicable Transmission and Distribution Service Providers (TSP/DSP) to determine status of interconnection facilities. Should the status for the facilities be operationally acceptable, NOC personnel will follow the appropriate procedures to reconnect the facilities to the system.
- Should the status of the facilities be operationally unacceptable, NOC personnel will work with the Director of Operations to determine the extent of repairs and availability of parts and labor. Additionally, NOC personnel will contact the applicable TSP/DSP to determine path to outage resolution, as necessary. Upon completion of system repairs and confirmation thereof by the Director of Operations and/or TSP/DSP, NOC personnel will coordinate with the appropriate HEN personnel, ERCOT, and TSP/DSP to return the facilities to service

PANDEMIC AND EPIDEMIC ANNEX

PUC SUBST. R. §25.53(e)(2)(D)
PANDEMIC AND EPIDEMIC ANNEX*

Purpose and Applicability

Provide guidelines and procedures to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic or epidemic and to generally prepare HEN Infrastructure for the possibility of a pandemic or epidemic.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule, §25.53.

Initial Tasks

- Develop a list of essential personnel and tasks that will require workers to be on-site at the HEN Infrastructure facilities and the NOC.

Ongoing Maintenance

- The Pandemic and Epidemic Annex will be reviewed annually.

Pre-Event Tasks

- Monitor and communicate with personnel any potential pandemic or epidemic-level contagions that may impact the area or primary operations center.
- Ensure adequate supply of disinfectant is on hand to treat potentially contaminated surfaces/areas.
- Ensure an adequate supply of personal protective equipment used to prevent the spread of the contagion is available for site personnel use.
- Identify any tasks / activities that can be delayed or altered to limit the spread of the contagion.

Plan

- A plan will be set in place to prepare for and control a pandemic or epidemic event both on site(s) as well as at the NOC. When pandemic or epidemic conditions exist, the Hunt Consolidated Inc. Human Resources (HR) personnel will educate employees on the symptoms and preventative actions to limit the spread of the contagion, as directed or informed by the appropriate federal agency or the Texas Department of State Health Services. The management will also direct employees who have the contagion to take the proper actions to limit the spread of the contagion and any area, equipment or other items possibly contaminated will be disinfected.

Post-Event Tasks

- Continuously monitor actions to develop lessons learned from pandemic and epidemic emergencies to ensure necessary supplies and personnel are available to ensure uninterrupted service
- Record all post-event actions in lessons learned log.

HURRICANE EMERGENCY ANNEX

PUC SUBST. R. §25.53(e)(2)(E)
HURRICANE EMERGENCY ANNEX*

Purpose and Applicability

Provide guidelines and procedures to effectively deal with operations, restoration and communications circumstances presented by a hurricane and to generally prepare HEN Infrastructure for the possibility of operational interruptions.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule, §25.53.

Initial Tasks

- Develop criteria defining when primary operations of the NOC must be relocated to the Disaster Recovery, Back-up operations center in [redacted] ("DR Back Up Center").

Ongoing Maintenance

- The Hurricane Emergency Annex will be reviewed as annually.
- DR Back Up Center functionality will be tested annually.

Pre-Event Tasks

- Monitor and communicate with personnel any potential severe weather threats that may impact the NOC.
- Monitor ERCOT communications to identify the severity of the extreme weather event.
- Ensure adequate exit paths to the DR Back-Up Center location are available.
- Ensure adequate supply of personal protective equipment for personnel is available prior to transit.
- Identify any tasks / activities that can be delayed or altered due to transitional period and personnel that assist during interim.

Plan

- If a severe weather is forecasted which could possibly interfere with the operation of the NOC, HEN leadership will make a strategic decision whether to evacuate and relocate to the DR site.
- HEN management will make the decision to activate the DR Back Up center at least 7 days prior to the projected event and no less than 6 days prior to such event.
- If a final judgement has been made to relocate to the DR Back Up Center, HEN management will inform the NOC Team to begin evacuation procedures.
- Immediately after the decision to relocate operations and at the discretion of the NOC Manager, a single NOC Operator will be dispatched to establish operations at the DR Back Up center prior to transferring operational responsibilities.

- At the discretion of the NOC manager ERCOT hotline phone communications may be temporarily transferred to Hunt Consolidated Inc.- Global Security Center to maintain operational continuity until the NOC has full evacuated to the DR Back Up Center.
- Prior to transferring operational responsibilities and after the initial NOC member has arrived at DR Back Up Center, the individual will perform the following tasks:
    - Log into all applications.
    - Review all operating systems (Supervisory Control and Data Acquisition systems, ERCOT Market Information System, ERCOT market transaction system, Indie, Internet, Emails, Office, cloud, etc.) and make sure all systems are operational.
    - Check the DR phone lines for communications. (If there are any issues with our phone, contact management immediately to resolve this)
    - After all applications has been checked, NOC personnel at the DR Back Up Center will contact the Hunt Consolidated Inc.- Global Security Center and take over the ERCOT phone.
    - Call ERCOT to inform them that the NOC will be operating from the DR Back Up Center. Give ERCOT the DR phone number and do a hotline ringdown call for confirmation.
    - Send an email to all HEN personnel that NOC will be operating at DR until further notice.
    - Log that the NOC has successfully transitioned to the DR Back Up Center and has commenced operations.
- Once the NOC operations at the DR Back Up Center are secured, the primary NOC operations in [redacted] will be ordered to shut down operation, and the remaining NOC team may proceed to evacuate.

Post-Event Tasks

- Review post-event actions to develop lessons learned from hurricane emergency incident and to ensure necessary supplies and personnel are available through the next hurricane event.
- Record all post-event actions in lessons learned log.

CYBER SECURITY ANNEX

PUC SUBST. R. §25.53
CYBER SECURITY ANNEX

Purpose and Applicability

Provide broad policy to effectively respond to various cyber security concerns including cyber protection, risk mitigation, education, and controls presented operational interruptions.

*This section was prepared in accordance with the Public Utility Commission of Texas (PUC) Substantive Rule, §25.53.

Initial Tasks

- Develop broad policy for effectively responding to the evolving cyber landscape.

Ongoing Maintenance

- The Cyber Security Annex will be reviewed as necessary.

Policy

The HEN PM cyber security policy and standards are to ensure that appropriate practices are exercised in protecting HEN Infrastructure.

1. **Policy Scope**

   This policy applies to all parties (employees, contractors and third parties) who have access to the HEN PM network(s), cyber assets, computing resources or electronic data (hereinafter, the "users").

   1.1 Policy Exceptions

   Any request for an exception to a HEN PM security policy, standard, or procedure must be documented in writing and approved by the Change Management Committee and Operations Management of HEN PM.

2. **Password Controls**

   2.1 Unique User ID and Password Required

   All users must have a single unique user ID and a personal secret password to access any HEN PM user computer, industrial control systems and electronic networks. Each user is fully responsible for the user and content of their account.

   2.2 Password Sharing

   Passwords must never be shared or revealed to anyone other than the authorized user. An

exception is made when first establishing a password, or when resetting a password.

2.3 Reuse of authentication credentials on public web sites

Users must never use their HEN PM network or computer credentials on a public internet site which requires authentication.

2.4 Non-Employee User ID Expiration

Every user ID established for a non-employee must have a specified expiration date. If access is no longer required, the password must be expired as soon as practicable.

2.5 Storage of Passwords

Fixed passwords must not be stored in readable form in batch files, automatic logon scripts, software macros, terminal function keys, in computers without enforced access control mechanisms, or in other locations where unauthorized persons might discover or user them. Passwords must always be encrypted when held in storage for any significant period of time or when transmitted over networks.

3. Access Control

3.1 Privilege Restriction

The computer and communications system privileges of all users, systems and programs must be restricted based on the least privileged practice. This standard is to be applied to all file permissions, role-based access control and any applicable HEN PM electronic system.

3.2 Notification Regarding Third Party Access

Any changes to third party personnel roles must be immediately communicated to relevant system administrators, so proper access changes can be made effective immediately.

3.3 External Connections

Users will not connect any HEN PM transient cyber asset to an external network unless the advanced permission of the Operations unit has been obtained. Access to all external networks for transient cyber assets must flow through HEN PM network and firewalls.

4. Security Awareness and Training

4.1 Security Policy Training

Users must not be given access to HEN PM systems unless they have read the HEN PM cybersecurity policy to perform his or her work according to these same policies.

4.2 Policy Support

Users at all levels must actively support security within the organization with clear commitment and acknowledgement of cybersecurity responsibilities.

4.3 Education, Training, Awareness

The protection of cyber assets will be fostered through proper education and security awareness activities. The HEN PM will utilize existing Hunt Consolidated Inc. cyber security awareness training programs. Training can be customized based on the need of the individual or task.

4.4 Incident Notification

All cyber incidents must be reported to the HEN PM Operations group and management. All reportable cyber incidents must be reported to ERCOT, per Nodal Protocol 16.18. Responses to all cyber incidents will follow the HCI cyber incident matrix.

5. Information Protection and Control

5.1 Asset Identification and Inventory

HEN PM identifies, classifies, and protects sensitive information associated with cyber assets. Cyber assets must be tracked, managed, and obtained through an authorized procurement method. Risk assessments are conducted for applications, infrastructure and services hosted internally or externally that contain sensitive data.

5.2 Asset Protection

Cyber assets have controls in place to protect people, information resources and computer resources.

5.3 Change Control

Any change to a HEN PM cyber asset, computer resource, application, or development will be carried out following the change request process. The HEN PM operations personnel develop, document, and implement the processes which are used to identify and control most changes related to hardware or software components of the HEN PM infrastructure.

5.4 Patching

Systems will be patched on an as needed or scheduled basis.

5.5 Changes Made by Authorized Personnel

All changes to HEN PM devices must be made only by persons who are authorized by assets associated internal owned group.

5.6 Operation Technology Risk

A risk assessment for all SCADA/ICS/OT systems will be conducted on an annual basis.

5.7 Backup and Recovery

Important systems and data will be backed up. Associated recovery plans must be documented, and recovery of critical applications and assets must be periodically tested.

5.8 Malicious Software Prevention

Cyber assets will be isolated from external access whenever possible. The use of anti-virus software and other malware protection tools to detect, prevent, deter, and mitigate the introduction, exposure to malware on all cyber assets.

5.9 Account Management

Proper procedures are to be implemented to enforce access authentication, maintain account privileges, and access needs.

The removal or disabling of expired accounts are enforced in a timely manner.

5.10 New or Modified Cyber Assets

All new or modified cyber assets will undergo an appropriate testing period to ensure any changes do not adversely affect existing security controls.

PHYSICAL SECURITY INCIDENT ANNEX

PUC SUBST. R. §25.53(e)(2)(G)
PHYSICAL SECURITY INCIDENT ANNEX

Purpose and Applicability

Provide broad physical security response plan to effectively respond to various physical security incidents that may result in operational interruptions to grid activities and services.

Initial Tasks

- Develop criteria defining when a response is required to a physical security incident.

Ongoing Operations

Responsibilities for energy storage facility physical security include protecting personnel and securing all physical asset from threats, intrusions, and breaches. These responsibilities are provided by the Director of Operations and include:

- Deterrence, Detection, Delay & Response
- Live video surveillance
- Perimeter fencing and barbed wire overhead
- Locks and passcodes at all access points to systems and controls
- Controlled access to operational sites through credentialed verification
    - Preventing unauthorized personnel or guests from being able to access sensitive areas within the facility
    - Protection of confidential information
    - Protection of physical assets
    - Protection of individuals from hazardous environments

Plan

- Should a physical security incident occur, the NOC will evaluate the level of severity. Upon determination, NOC operators will contact the relevant authorities to dispatch to the site location and contact corporate personnel. Operations personnel, in conjunction with the appropriate authorities, will coordinate and cooperate with the authorities to provide relevant incident information to minimize additional damage and secure site to prevent further incidents. Operations personnel will maintain a secured site until such time that restoration efforts have completed.
- The BESS system is equipped with an adaptive recloser that promotes unnecessary outage and losses, yet there may be some environmental hazards that may cause a threat or failure to the system. Some examples of an environmental hazard can be the result of ambient temperature extremes, seismic activity, floods, ingress of debris or corrosive mists such as dust or salt fog, or rodent damage to the wiring. During hazardous conditions or plausible threats, the action plan is to:

- Contact field personnel/inspector
  - available for response
  - time to site (24-hour response time)
- Contact a certified electrician, as needed
- Pre-conditioning before heading to site
- Inspect, identify, and resolve complications
- Restore the system to full capacity
- Notify agency and local officials of restoration

In the event of a ***total loss of power***, the system has generation hook-up capabilities that could keep the site idle efficiently until distribution line is restored.

Post-Event Tasks

- Continuously monitor site locations
  - Documentation
  - Photographs
  - Field assessments (damages, repair work, hours worked, etc.)
- Record all post-event actions in lessons learned log
- Continue training & communication procedures in the event of a breach
- Maintain up-to-date and accurate contact information for emergency services or first responders.

Attachments/Appendix

EOP Training List				
Name	**Title**	**E-Mail**	**Phone**	**Date of Training**
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022
[redacted]	[redacted]	[redacted]	[redacted]	04/05/2022

EOP Distribution List			
Name	**Title**	**E-Mail**	**Date of Receipt**
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022
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[redacted]	[redacted]	[redacted]	04/01/2022
[redacted]	[redacted]	[redacted]	04/01/2022

HEN Power Marketing, L.L.C. Solutions Team					
Position	Name	Title	E-Mail	Office	Cell
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	

HEN 24x7 Operations/Emergency Desk Phone Number(s)					
Name	**Department**	**Office**	**Cell**	**HCI Global Security Center**	**Email**
[redacted]	[redacted]	[redacted]		[redacted]	[redacted]
[redacted]	[redacted]	[redacted]		[redacted]	[redacted]
[redacted]	[redacted]	[redacted]		[redacted]	[redacted]
HEN 24x7 Point of Contact					
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
HEN Site Telemetry and Communications Point of Contact					
[redacted]	[redacted]			[redacted]	[redacted]
[redacted]	[redacted]			[redacted]	[redacted]

Emergency Response Services Contact Information

City Emergency Services		
Name	**Location**	**Telephone**
Balmorhea Volunteer Fire Department	Balmorhea, TX	911 or 432.375.2307
Balmorhea EMS	Balmorhea, TX	432.375.2307
Balmorhea City Mayor	Balmorhea, TX	432.755.6987

County Emergency Services		
Name	**Location**	**Telephone**
Reeves County Sheriff	Pecos, TX	911 or 432.445.4901
Reeves County Hospital	2323 Texas Street, Pecos, TX 79772	432.447.3551
Pecos County Sheriff	Fort Stockton, TX	432.336.3521
Pecos County Hospital	387 West, I-10, Fort Stockton, TX 79735	432.336.2004

State Government Organizations		
Agencies	**Location**	**Telephone**
State Emergency Response Commission	Austin, TX	512.463.7727
Texas Commission of Environmental Quality (Air Emissions & Oil & Oil Spill into Water)	Midland, TX (Region 7)	432.570.1359
Texas Parks and Wildlife	Austin, TX	512.475.3606

Federal Government Organizations		
Government Agency	**Location**	**Telephone**
Environmental Protection Agency	Dallas, TX	214.767.2666
OSHA	Lubbock, TX	806.472.7681
National Response Center (Oil Spills Into Water)	Washington, D.C.	1.800.424.8802

Electric Utility Organizations		
Organization	**Location (TX)**	**Telephone**
AEP Texas North/South	Corpus Christi	866.296.3565 877.806.2625
TNMP	Houston	281.581.4762
ERCOT Operations Desk	Bastrop/Taylor	Contact HEN NOC to Use ERCOT WAN Phones

Contractors			
Service	**Name**	**Location**	**Telephone**
[redacted]	[redacted]	[redacted]	[redacted]

Landowner	Contact Info	Land Description

Evacuation / Shelter Plan

Evacuation / Shelter

1. If an unplanned event or an unavoidable extreme weather condition is forecasted, HEN management will alert all NOC & Hunt's Communication Center of possible severity of the event. If necessary, the responsibility of the ERCOT phone monitoring will be transferred to the Hunt Consolidated Inc.- Global Security Center.
2. If time permits, HEN management will communicate with NOC to evacuate to the nearest fire escape stairwell and grab their laptop along with the NOC Emergency go bag.
3. If time does not permit, NOC will grab their laptop along with the NOC Emergency go bag and seek shelter in our safe room until the event has passed.
4. HEN management will alert all other NOC staff at a safe location to take over operation until NOC can safely resume operation at the primary NOC location.
5. NOC personnel at the primary location will notify HEN management and Comm center of their health status and update management if operation can be resumed at their location.
6. If our primary location is inoperable, HEN management will alert all NOC staff & the Comm center to activate our DR process to begin relocation.

Muster Point

[redacted]

Special Hazards

Stored electrical energy

High voltage electrical equipment

Potential for vented battery electrolyte gas during an overheating event and consequent venting

Africanized Bees have been reported in the area

Remoteness

Network Optimization Center

Extreme Weather Emergency Operating Procedure

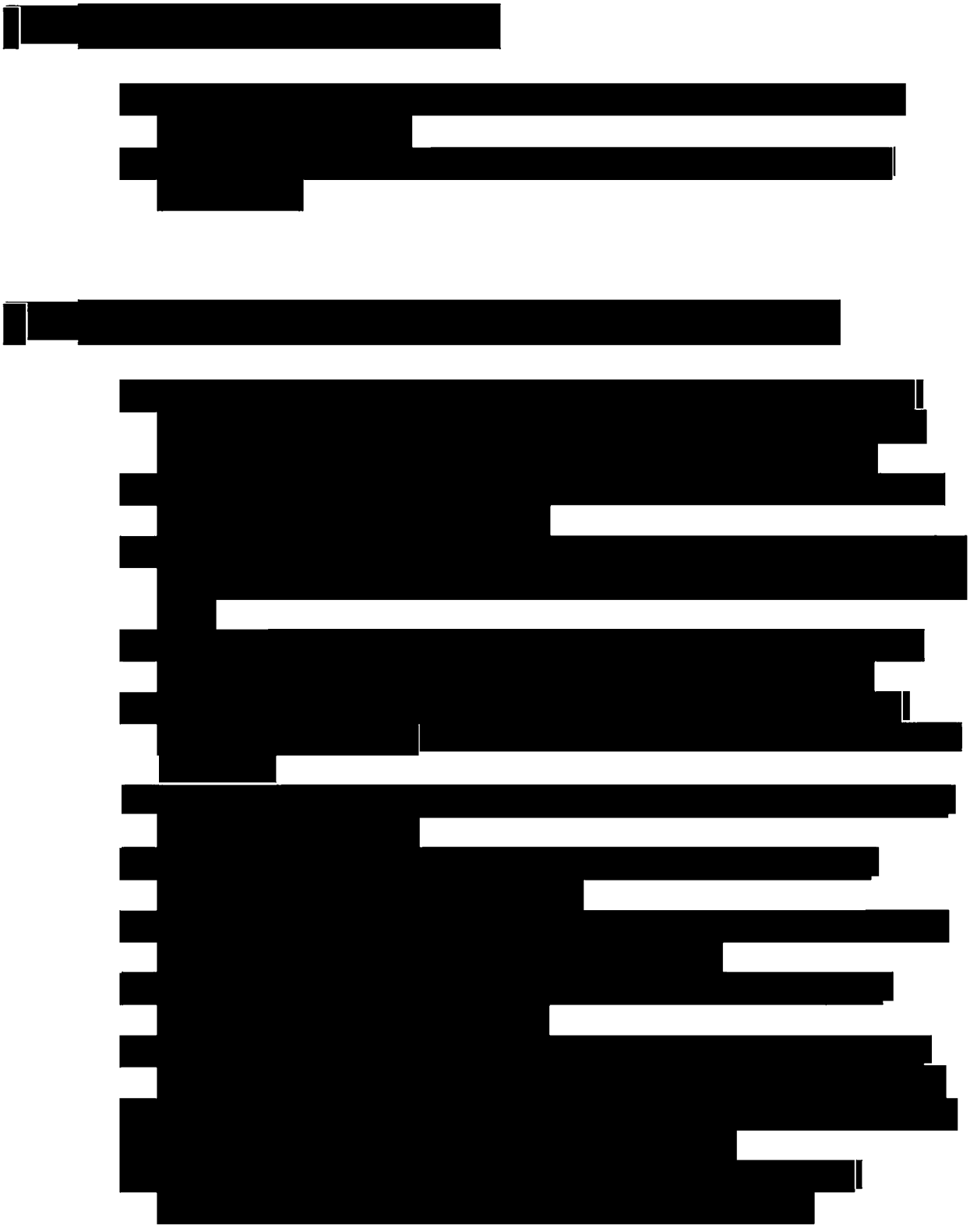
[redacted]

[redacted]

[redacted]

[redacted]

[redacted]



[redacted]

[redacted]

[redacted]

[redacted]

Energy Emergency Alert levels

EEA Level 1
When operating reserves drop below 2,300 MW and are not expected to recover within 30 minutes, grid operators can call on all available power supplies, including power from other grids, if available.

EEA Level 2
When operating reserves are less than 1,750 MW and are not expected to recover within 30 minutes, ERCOT can reduce demand on the system by interrupting power from large industrial customers who have contractually agreed to have their electricity turned off during an emergency. ERCOT can also use demand response resources that have been procured to address tight operating conditions.

EEA Level 3
An EEA3 is declared if operating reserves cannot be maintained above 1,375 MW. If conditions do not improve, continue to deteriorate or operating reserves drop below 1,000 MW and are not expected to recover within 30 minutes, ERCOT will order transmission companies to implement rotating outages.

[redacted]

#11 EEA 3:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name], at [xx:xx], ERCOT is declaring EEA 3, [MW Amount] of firm load is being shed. Implement all measures associated with EEA 1 and 2, if not already implemented. [QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

#12 EEA 3 Deployed ERS-10 / ERS-30 / both ERS-10 and ERS-30 / ERS-10, ERS-30 including Weather Sensitive Script:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name], at [xx:xx], ERCOT is in EEA3. All [10 min / 30 min / both the 10 min and 30 min / 10 min and 30 min including Weather Sensitive] ERS Resources with an obligation in the current time period have been deployed. [QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

[redacted]

#16 Terminating EEA:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name]. At [xx:xx], ERCOT is terminating EEA 1. A Watch still remains in effect. [QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

#17 Cancel Watch for PRC below <2500:
"This is ERCOT Operator [first and last name]. At [xx:xx], ERCOT is canceling the Watch for Physical Responsive Capability. At this time, Resource testing may resume. [QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

#13 Restoring Firm Load:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name], at [xx:xx], ERCOT is restoring firm load.
[QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

#14 Moving from EEA3 to EEA2 Load Resource Recall:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name]. At [xx:xx], ERCOT is moving from EEA 3 to EEA 2. QSEs are to recall all Load Resources at this time. [QSE] please repeat this back to me."
If repeat back is **CORRECT**, "That is correct, thank you."
If **INCORRECT**, repeat the process until the repeat back is correct.

#15 Moving from EEA2 to EEA1 ERS Recall:
"This call requires everyone to remain on the line until it is complete. [QSE] I will be asking you for the repeat back. This is ERCOT Operator [first and last name]. At [xx:xx], ERCOT is moving from EEA 2 to EEA 1. QSE's are to recall [10 MIN], [30 MIN], [weather-sensitive ERS], [both 10 MIN and 30 MIN] or [both 10 MIN and 30 MIN including weather-sensitive] ERS Resources at this time. [QSE] please repeat this back to me."

[redacted]