



## Filing Receipt

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## Executive Summary

### Emergency Operations Plan of Declaration Energy LLC

Declaration Energy LLC is referred to in this Executive Summary as the “Company”.

This Executive Summary, among other things:

1. Describes the contents and policies contained in the Company’s Emergency Operations Plan (“EOP”);
2. Includes a Table of Contents that makes reference to specific sections and page numbers of the EOP that correspond with the requirements of §25.53 of the Substantive Rules Applicable to Electric Service Providers (the “Rules”), as promulgated by the Public Utility Commission of Texas (the “Commission”);
3. Includes the Record of Distribution as required by §25.53(c)(4)(A) of the Rules; and
4. Contains the Affidavit required by §25.53(c)(4)(C) of the Rules.

#### Purpose

This Emergency Operations Plan designed to be a guide during an Emergency Event. Its purpose is to ensure the effective implementation and coordination of the corporate emergency response actions during an Emergency Event. Energy Texas has developed and will maintain a comprehensive set of risk mitigation plans to; prepare for, respond to, recover from, and inform its constituents regarding all types of business interruption incidents that might occur. The plan meets the requirements for preparing and filing annually and incorporates regulatory orders into its development. The SVP of Customer Experience is responsible for managing and evaluating the effectiveness of this plan.

#### Declaration of an Emergency

An emergency shall be declared by the Chief Executive Officer (CEO), Executive Vice President, or the Senior Vice President of Customer Experience when weather, other natural, or man-made causes (e.g., major equipment failure, civil unrest, terrorism, wildfire, etc.) threaten to cause conditions that result in substantial loss of electric service, which may not be handled effectively through normal operating procedures. When possible, advance warning advisories will be issued by Energy Texas prior to the declaration of an emergency.

#### Initiation of Emergency Operations Plan

Declaration Energy LLC dba Energy Texas has approved the initial Emergency Operation Plan on Monday, April 11, 2022. This plan supersedes any previous Emergency Operation Plans. No changes have been made to the Emergency Operations Plan since Monday, April 10, 2022.

#### Emergency Operations Plan Review

The Emergency Operations Plan will include conducting a system-wide exercise and multiple training sessions annually with the system-wide exercise completed by June 1 of each year. This has not yet been done for the 2022 year but will be completed by June 1. The required advance notice to the PUCT will be provided as required. Additionally, the Emergency Operations Plan will be reviewed and revised annually

for submittal to Texas Public Utility Commission no later than March 15th of each calendar year with identified revisions. This review and revision will include improvements resulting from the critique for an exercise or actual emergency event. However, the Plan may be revised more frequently if an event critique recommends changes and will be re-submitted to regulatory agencies if substantial changes occur.

## EOP Table of Contents

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## Record of Distribution

The following employees have received access to and training on the Emergency Operations Plan. Training was successfully completed on 4/11/2022.

Name	Title	Training Date
Robbie Wright	Chief Executive Officer	4/11/2022
Liz Maberry	EVP	4/11/2022
Katherine Wright	SVP Customer Experience	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022

## Revision Control Summary

The following table shows the Revision Control Summary to Energy Texas Operations Plan.

Version No	Implemented By	Revision Date	Description of Change
1.0	Katherine Wright, SVP Customer Experience	4/11/2022	Initial Plan Effective 4/11/2022

## List of Primary and Backup Emergency Contacts

The following individuals are Emergency Contacts for Energy Texas that can immediately address urgent requests and questions from the commission during an emergency.

Name	Title	Cell Phone	Email
Katherine Wright	SVP Customer Experience	[REDACTED]	kwright@energytexas.com
Elizabeth Maberry	EVP	[REDACTED]	lmaberry@energytexas.com
Russ Congi	Director of Customer Service	[REDACTED]	rcongi@energytexas.com

## AFFIDAVIT

STATE OF TEXAS

§

COUNTY OF Harris

§

§

1. My name is Robbie Wright. I am the CEO of Declaration Energy LLC.
1. I swear, or affirm that with respect to the Emergency Operations Plan (EOP) for Declaration Energy LLC, each of following statements is true and accurate to the best of my knowledge.
  - a. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
  - b. The EOP has been reviewed and approved by the appropriate executives.
  - c. Drills that test this EOP will be conducted to the extent required by Commission rules by June 1, 2022.
  - d. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
  - e. Declaration Energy LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
  - f. Declaration Energy LLC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received, or will receive, the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Signature: Robbie Wright

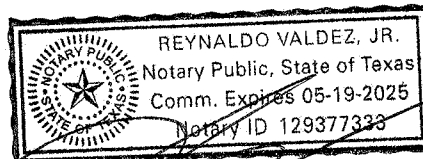
Typed or Printed Name: Robbie Wright

Title of Signatory: CEO, Declaration Energy LLC

SWORN TO AND SUBSCRIBED before me on the 14 day of April, 2022

[Signature]  
Notary Public In and For the  
State of Texas

My Commission Expires: 5.19.2025



Declaration Energy LLC dba Energy Texas  
Emergency Operations Plan  
4/11/2022

# Emergency Operations Plan- Approval and Implementation

Declaration Energy LLC dba Energy Texas (the "Company" or "Energy Texas") approved this Emergency Operations Plan ("EOP") as of April 11, 2022. This EOP supersedes all previous EOPs.

## Purpose

This Emergency Operations Plan designed to be a guide during an Emergency Event. Its purpose is to ensure the effective implementation and coordination of the corporate emergency response actions during an Emergency Event. Energy Texas has developed and will maintain a comprehensive set of risk mitigation plans to; prepare for, respond to, recover from, and inform its constituents regarding all types of business interruption incidents that might occur. The plan meets the requirements for preparing and filing annually and incorporates regulatory orders into its development. The SVP of Customer Experience is responsible for managing and evaluating the effectiveness of this plan.

## Declaration of an Emergency

An emergency shall be declared by the Chief Executive Officer (CEO), Executive Vice President, or the Senior Vice President of Customer Experience when weather, other natural, or man-made causes (e.g., major equipment failure, civil unrest, terrorism, wildfire, etc.) threaten to cause conditions that result in substantial loss of electric service, which may not be handled effectively through normal operating procedures. When possible, advance warning advisories will be issued by Energy Texas prior to the declaration of an emergency.

## Initiation of Emergency Operations Plan

Declaration Energy LLC dba Energy Texas has approved the initial Emergency Operation Plan on Monday, April 11, 2022. This plan supersedes any previous Emergency Operation Plans. No changes have been made to the Emergency Operations Plan since Monday, April 10, 2022.

## Revision Control Summary

The following Revision Control Summary table shows the record of changes to the Energy Texas Operations Plan.

Version No	Implemented By	Revision Date	Description of Change
1.0	Katherine Wright, SVP Customer Experience	4/11/2022	Initial Plan Effective 4/11/2022



## Emergency Contacts

The following individuals are Emergency Contacts for Energy Texas that can immediately address urgent requests and questions from the commission during an emergency.

Name	Title	Cell Phone	Email
Katherine Wright	SVP Customer Experience	[REDACTED]	kwright@energytexas.com
Elizabeth Maberry	EVP	[REDACTED]	lmaberry@energytexas.com
Russ Congi	Director of Customer Service	[REDACTED]	rcong@energytexas.com

## Emergency Operations Plan Maintenance

The following individuals are responsible for maintaining and implementing the EOP.

Name	Title	Can Interact with Government Emergency Management Officials	Can Make Changes to the Emergency Operations Plan
Robbie Wright	Chief Executive Officer	No	Yes
Liz Maberry	EVP	Yes	Yes
Katherine Wright	SVP Customer Experience	Yes	Yes

IS training for applicable employees will be completed by June 1, 2022.

## Emergency Operations Plan Review

The Emergency Operations Plan will include conducting a system-wide exercise and multiple training sessions annually with the system-wide exercise completed by June 1 of each year. This has not yet been done for the 2022 year but will be completed by June 1. The required advance notice to the PUCT will be provided as required. Additionally, the Emergency Operations Plan will be reviewed and revised annually for submittal to Texas Public Utility Commission no later than March 15th of each calendar year with identified revisions. This review and revision will include improvements resulting from the critique for an exercise or actual emergency event. However, the Plan may be revised more frequently if an event critique recommends changes and will be re-submitted to regulatory agencies if substantial changes occur.

## Emergency Operations Plan Access and Training

The following employees have received access to and training on the Emergency Operations Plan. Training was successfully completed on 4/11/2022.

Name	Title	Training Date
Robbie Wright	Chief Executive Officer	4/11/2022

Liz Maberry	EVP	4/11/2022
Katherine Wright	SVP Customer Experience	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022
[REDACTED]	[REDACTED]	4/11/2022

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# Emergency Operations Plan - Day to Day Operations

## Staffing

All Energy Texas internal and external applications are web-based. This allows Energy Texas to easily pivot to a work from home (or other designated location) without loss of data or productivity. Specific job functions are listed below would continue their functions at home:

- Management
- Back Office/Operations
- Call Center/Customer Service
- Trading/Supply
- Marketing
- Accounting

Employees are to notify the SVP of Customer Experience if they are experiencing any internet or power outages that would impede work flow. Back Office employees are cross-trained to ensure that operations continue without interruption.

## Pre-Identified Supplies

Energy Texas has identified the following supplies as necessary to continue its operations during an emergency: Company issued laptops so that work from home is possible; power cords; wifi hot-spots, batteries, and pens/notepads. Supplies are reviewed and evaluated quarterly to ensure there are adequate supplies and that they are working.

## Call Center

Energy Texas uses a web-based platform to host/manage Toll Free Numbers, IVR, call routing, and customer emails. Energy Texas has full access to update IVR messaging as needed during an emergency. All Call Center agents work from home and are able to log in to the web-based call center platform remotely to serve customers

## Customer Management

Given that all applications are web-based, Energy Texas will be able to provide customers with access to live customer support (via work from home agents) as well as our self-service portal (MyAccount) to perform business as usual functions. Expressly stated Customer service functions are listed below:

1. Report an outage – Customers are provided TDU outage information via live customer support, IVR, and the Energy Texas website.
2. Pay their bill– Customers can pay their bill via our online self service portal, online quick pay functionality, via a live agent or physical check.
3. Request payment assistance – Customers will be able to request payment assistance via live agent or email.
4. Make inquiries regarding the accuracy of their bill – Customers will be able to make inquiries regarding the accuracy of their bill via live agent or email.
5. Enroll on a different product - Customers can enroll on a different product via our online self service portal or live customer service.

6. File a complaint - Customers will be able to file a complaint via live agent or email.

### Back Office Functions

Given that all applications are web-based, Energy Texas will be able to continue back office functions as normal with back office personnel working from home. The following back office functions have been outlined below:

1. Billing – All bills are generated in-house via web-based applications to gather transactions from ERCOT and generate a bill. Billing Analysts will work from home to ensure customers continue to be billed in a timely manner. Email addresses are required during enrollment for all customers. Regardless of communication preference, all customers receive an email notification once a bill is generated for the customer. All customers also have access to log in to their online self service portal to view and pay their bill.
2. Printed Communications – The vendor used by Energy Texas to print and mail communications to customers is located in a different city than Energy Texas. The vendor's Emergency Operations Plan has been attached.
3. Enrollment – Customers will be able to enroll via live customer support or website.
4. Payment Processing – Energy Texas uses an api integration with a payment gateway for payment processing. Customers will be able to pay their bill via our online self service portal, online quick pay functionality, via a live agent. Customers enrolled in Automatic Payments would run as usual.

## Emergency Operations Plan - Communications Plan

During implementation of the Emergency Operations Plan, Energy Texas has designated Executive Team contacts to communicate with outside parties during an emergency as applicable. Information will be communicated with each entity as determined by the Energy Texas Executive team's decision to implement the Emergency Operations Plan. The following individuals will be responsible for communicating with specific entities:

- The Public;
  - a. Responsible Internal Party - Elizabeth Maberry
  - b. Contact Information
    - i. Cell - [REDACTED]
    - ii. Email – lmaberry@energytexas.com
  - c. Back up – Katherine Wright
    - i. Cell - [REDACTED]
    - ii. Email – kwright@energytexas.com
  - d. Trigger of Communication – Energy Texas will publicly release information to the Public as it deems necessary during implementation of the Emergency Operations Plan.
- The Media
  - a. Responsible Internal Party - Elizabeth Maberry
  - b. Contact Information
    - i. Cell - [REDACTED]
    - ii. Email – lmaberry@energytexas.com
  - c. Back up – Katherine Wright
    - i. Cell - [REDACTED]
    - ii. Email – kwright@energytexas.com
  - d. Trigger of Communication – Energy Texas will respond to any media inquiries as appropriate during implementation of the Emergency Operations Plan.
- Customers
  - a. Responsible Internal Party – Katherine Wright
  - b. Contact Information
    - i. Cell - [REDACTED]
    - ii. Email – kwright@energytexas.com
  - c. Back up – Elizabeth Maberry
    - i. Cell - [REDACTED]
    - ii. Email – lmaberry@energytexas.com
  - d. Trigger of Communication – Energy Texas will communicate with customers via email, phone, text, social media and online self service portal during implementation of the Emergency Operations Plan.
- The Commission
  - a. Responsible Internal Party – Katherine Wright
  - b. Contact Information
    - i. Cell - [REDACTED]
    - ii. Email – kwright@energytexas.com
  - c. Back up – Elizabeth Maberry
    - i. Cell - [REDACTED]

- ii. Email – lmaberry@energytexas.com
  - d. Trigger of Communication – Energy Texas will provide information to the Commission as requested as well as incorporate any information from the Commission into communications during implementation of the Emergency Operations Plan.
- OPUC
  - a. Responsible Internal Party – Katherine Wright
  - b. Contact Information
    - i. Cell - [REDACTED]
    - ii. Email – kwright@energytexas.com
  - c. Back up – Elizabeth Maberry
    - i. Cell - [REDACTED]
    - ii. Email – lmaberry@energytexas.com
  - d. Trigger of Communication – Energy Texas will provide information to the OPUC as requested as well as incorporate any information from the Office of Public Utility Counsel into communications during implementation of the Emergency Operations Plan.

### Complaint Handling

During implementation of the Emergency Operations Plan, complaint handling would continue to function as in non-emergency conditions. Energy Texas has outlined the process for informal and formal complaints below:

- Informal Complaints – Given that all Energy Texas applications are web-based and that Energy Texas has a work from home call center, informal complaints would be handled via live customer service and/or email. Any escalated customer issues would be escalated to internal management as the usual process for any escalated customer service issue.
- Formal Complaints – Formal complaints to the PUCT or BBB would be sent via the existing contacts to Energy Texas and handled and responded to within the required timeframes.

## Emergency Operations Plan – Staffing Plan

All Energy Texas internal and external applications are web-based. This allows Energy Texas to easily pivot to a work from home (or other designated location) without loss of data or productivity. Specific job functions are listed below:

- Management
  - Management to work from home and meet with management team and direct reports via conference call and zoom as the emergency situation permits.
- Back Office/Operations
  - Back Office and operational employees to work from home utilizing conference calls, email and web-based applications. Back Office employees are cross-trained to ensure that operations continue without interruption.
- Call Center/Customer Service
  - Call Center agents to continue business as usual in work from home with web-based call center functionality and Customer Information System platform.
- Trading/Supply
  - Trading/Supply to work from home utilizing conference calls, email and web-based applications.
- Marketing
  - Marketing to work from home utilizing conference calls, email and web-based applications.
- Accounting
  - Accounting/Finance to work from home utilizing conference calls, email and web-based applications.

Employees are to notify the SVP of Customer Experience if they are experiencing any internet or power outages that would impede work flow.



## Emergency Operations Plan – Identifying Weather Related Hazards

This Plan addresses how Energy Texas identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process that Energy Texas follows to activate the EOP. Pre-planning and communication are essential ingredients to the success of an emergency response effort. In regard to weather-related hazards, Energy Texas follows the following procedure to activate the EOP.

The Company monitors private publications and subscriptions to weather reports and alerts throughout Texas as well as public weather reports and alerts via online apps, television channels, radio stations and other public news and weather sources to identify the possibility of tornadoes, hurricanes, extreme hot weather, extreme cold weather, drought, and flooding.

Management Meeting - When there is a reasonable probability that a major storm or weather event could impact ERCOT, Energy Texas management will establish a meeting to discuss likelihood and preparations and whether to implement the Emergency Operations Plan. Management will meet daily leading up to and during the weather event. An emergency shall be declared by the Chief Executive Officer (CEO), Executive Vice President, or the Senior Vice President of Customer Experience.

Customer Communications - Energy Texas will implement communications to customers for the weather-related hazard including emails, social media posts, text with communications such as preparedness tips, outage information, evacuation plans, etc for the affected customers in the applicable TDU.

Work From Home Protocol – If the event occurs within the location of the Energy Texas corporate office, Energy Texas will advise all employees to work from home during the weather event for the safety of the employee and to ensure continuity for customers.

## Emergency Operations Plan - Pandemic and Epidemic Annex

### Purpose

This document is an annex to Energy Texas Emergency Operations Plan. The Pandemic and Epidemic Annex provides a framework for infectious disease-specific preparedness and response activities and serves as a foundation for further planning, drills, and emergency preparedness activities. The information in this document serves as a supplement to, and not replacement for, the information in the Emergency Operations Plan.

### Implementation of Plan

Energy Texas Management closely monitors the Harris County Public Health Dashboard. In the event of an impending pandemic, Energy Texas management will establish a meeting to discuss likelihood and preparations and whether to implement the Emergency Operations Plan for a Pandemic. The phases of the plan are listed below.

Level	Definition	Description
III	Normal Conditions	Infectious diseases or pandemic events pose a minimal immediate risk to employees.  Employees report to work as usual
II	Partial Activation	Infectious diseases or pandemic events pose an increased risk to employees.  Employees can optionally work from home  Any infected employees would be required to isolate in accordance with CDC Guidelines.
I	Full Activation	Infectious diseases or pandemic events pose a major risk to employees.  Employees are mandated to work from home

The Management Any State or Federally mandated lockdowns due to a pandemic would result in the initiating of the Level I Pandemic Emergency Operations Plan.

Management decisions for the threat level and work from home requirements would be communicated to employees immediately.

Customer Communications - Energy Texas will implement communications to customers for the Emergency Operations Plan for a Pandemic as applicable to alert customers of any health resources, moratoriums, etc. Communications include emails, social media posts and text.

Work From Home Protocol – If the event occurs Energy Texas will advise all employees to work from home using all our web-based applications and virtual conferencing.

# Emergency Operations Plan - Hurricane Annex

## Purpose

This document is an annex to Energy Texas Emergency Operations Plan. The Hurricane Annex provides a framework for Hurricane preparedness evacuation plans. The information in this document serves as a supplement to, and not replacement for, the information in the Emergency Operations Plan.

## Implementation of Plan

Energy Texas Management closely monitors all weather advisories. In the event of an impending Hurricane, Energy Texas management will establish a meeting to discuss likelihood and preparations and whether to implement the Emergency Operations Plan for a Hurricane. The phases of the plan are listed below.

Level	Definition	Description
III	Normal Conditions	No Threat
II	Tropical Storm/Hurricane – No Evacuation Required	Impending Tropical Storm or less severe Hurricane.  Employees to work from home. Employees to evacuate at their own discretion.
I	Tropical Storm/Hurricane – Evacuation Strongly Recommended	Impending severe Hurricane  Employees to evacuate to a safe location

Any recommendation by local or federal government would result in the initiating of the Level I Hurricane Emergency Operations Plan.

Management decisions for the threat level and work from home requirements would be communicated to employees immediately.

Customer Communications - Energy Texas will implement communications to customers for the weather-related hazard including emails, social media posts, text with communications such as preparedness tips, outage information, evacuation plans, etc for the affected customers in the applicable TDU.

Work From Home Protocol – If the event occurs within the location of the Energy Texas corporate office, Energy Texas will advise all employees to work from home or a safe location during the weather event for the safety of the employee and to ensure continuity for customers.

Hurricane Evacuation Procedures – Energy Texas will follow local government guidelines regarding hurricane evacuation requirements. Energy Texas office will secure the office to ensure that pre-identified supplies are distributed to employees and the remaining office equipment is stored to minimize any office damage. If power outages are anticipated, Energy Texas will strongly recommend

that employees evacuate early to a safe location to ensure employee safety and continued business operations.

Hurricane Evacuation Re-Entry Procedures – Energy Texas will follow local government guidelines regarding hurricane evacuation re-entry requirements and protocols. Once local authorities have stated re-entry is possible, Energy Texas employees will continue to work remotely or from home until Energy Texas Management (in conjunction with the building landlord) inspects the Energy Texas office for any safety hazards and confirms power, water, and internet availability. Additionally considerations will also include road safety and availability as well as employee-specific impacts. Employees will be advised via email as to when they will be able to return to the office.

## Emergency Operations Plan - Physical Security Annex

### Purpose

This document is an annex to Energy Texas Emergency Operations Plan. The Physical Security Annex provides a framework for plans with a physical security event. The information in this document serves as a supplement to, and not replacement for, the information in the Emergency Operations Plan.

### Implementation of Plan

In the event of a physical security event, Energy Texas management will establish a meeting to discuss to implement the Emergency Operations Plan. The phases of the plan are listed below.

Level	Definition	Description
■	██████████	██████████ ██ ██████
■	██████████	██████████ ██ ██ ██ ██ ██████████
■	██████████	████████████████████ ██ ██████████

Management decisions for the threat level and work from home requirements would be communicated to employees immediately.

Customer Communications - Energy Texas will implement communications to customers for the physical hazard including emails, social media posts, text with communications as required in the applicable TDU.

Work From Home Protocol – If the event occurs within the location of the Energy Texas corporate office, Energy Texas will advise all employees to work from home or a safe location during the event for the safety of the employee and to ensure continuity for customers.

# Emergency Operations Plan - Cyber Security Annex

## Purpose

This document is an annex to Energy Texas Emergency Operations Plan. The Cyber Security Annex provides a framework for plans with a Cyber security event. The information in this document serves as a supplement to, and not replacement for, the information in the Emergency Operations Plan. This document describes the company's policies and processes regarding capturing and monitoring log data, correlating behaviors across logs, generating security alerts, and responding to the security alerts

## Information Security Policy

### 1. Ownership

#### 1.1. General

1.1.1. [REDACTED].

1.1.2. [REDACTED].

### 2. Regulatory Compliance

2.1. [REDACTED]

2.1.1. [REDACTED].

#### 2.2. Management Oversight

2.2.1. [REDACTED].

2.2.2. [REDACTED]

[REDACTED]

2.2.3. [REDACTED]

[REDACTED].

### 3. Information Protection Program

3.1. [REDACTED]

3.1.1. [REDACTED]

[REDACTED]

3.1.2. [REDACTED]

[REDACTED].

#### 3.2. Employee Background Checks

3.2.1. [REDACTED].

3.2.2. [REDACTED].

- 3.2.3. [REDACTED]
- 3.2.4. [REDACTED].
- 3.2.5. [REDACTED].
- 3.2.6. [REDACTED]  
[REDACTED].

### 3.3. Employee Responsibilities

- 3.3.1. [REDACTED].
- 3.3.2. [REDACTED]  
[REDACTED].
- 3.3.3. [REDACTED].
- 3.3.4. [REDACTED]  
[REDACTED].
- 3.3.5. [REDACTED]  
[REDACTED].

### 3.4. Employee Training

- 3.4.1. [REDACTED]  
[REDACTED]
- 3.4.2. [REDACTED].
- 3.4.3. [REDACTED]  
[REDACTED].
- 3.4.4. [REDACTED]  
[REDACTED].
- 3.4.5. [REDACTED]  
[REDACTED]

### 3.5. Data Classification

- 3.5.1. [REDACTED]  
[REDACTED]
- 3.5.2. [REDACTED]  
[REDACTED].
- 3.5.3. [REDACTED].

### 3.6. Potential Data Loss

- 3.6.1. [REDACTED]  
[REDACTED]



3.6.2. [REDACTED]  
[REDACTED].

3.6.3. [REDACTED]  
[REDACTED]  
[REDACTED].

### 3.7. Media Decommissioning

3.7.1. [REDACTED]  
[REDACTED]

3.7.2. [REDACTED]  
[REDACTED].

## 4. Sensitive Data Inventory & Handling

4.1. [REDACTED]

4.1.1. [REDACTED]  
[REDACTED].

4.1.2. [REDACTED]  
[REDACTED].

### 4.2. PII (Personally Identifiable Information)

4.2.1. [REDACTED].

4.2.2. [REDACTED]

4.2.3. [REDACTED].

### 4.3. Sensitive and Confidential Information

4.3.1. [REDACTED]

4.3.2. [REDACTED].

## 5. Data Security Incident Response

5.1. [REDACTED]

5.1.1. [REDACTED]  
[REDACTED]

### 5.2. Triage

5.2.1. [REDACTED]  
[REDACTED]:

5.2.1.1. [REDACTED].

5.2.1.2. [REDACTED].

- 5.2.1.3. [REDACTED].
- 5.2.1.4. [REDACTED].
- 5.2.1.5. [REDACTED].
- 5.2.1.6. [REDACTED].
- 5.2.1.7. [REDACTED].
- 5.2.1.8. [REDACTED]  
[REDACTED]
- 5.2.1.9. [REDACTED]  
[REDACTED].

### 5.3. Severity and Scope Analysis

- 5.3.1. [REDACTED]  
[REDACTED]
- 5.3.2. [REDACTED]  
[REDACTED].
- 5.3.3. [REDACTED].
- 5.3.4. [REDACTED].
- 5.3.5. [REDACTED].
- 5.3.6. [REDACTED].

### 5.4. Notification

- 5.4.1. [REDACTED]  
[REDACTED].
- 5.4.2. [REDACTED].
- 5.4.3. [REDACTED]  
[REDACTED].

### 5.5. Recovery

- 5.5.1. [REDACTED]  
[REDACTED].
- 5.5.2. [REDACTED]  
[REDACTED]  
[REDACTED].
- 5.5.3. [REDACTED]  
[REDACTED]  
[REDACTED].

5.5.4. [REDACTED]  
[REDACTED].

5.5.5. [REDACTED]  
[REDACTED].

5.5.6. [REDACTED].

5.5.7. [REDACTED]  
[REDACTED].

5.5.8. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

5.5.9. [REDACTED]  
[REDACTED].

5.5.10. [REDACTED]  
[REDACTED].

5.5.11. [REDACTED]  
[REDACTED].

## 5.6. Regulatory Impact

5.6.1. [REDACTED]  
[REDACTED].

5.6.2. [REDACTED]  
[REDACTED].

## 5.7. Contractual Impact

5.7.1. [REDACTED]  
[REDACTED].

## 5.8. Testing Frequency

5.8.1. [REDACTED].

5.8.2. [REDACTED]  
[REDACTED]  
[REDACTED]

## 5.9. Post-incident Analysis

5.9.1. [REDACTED]  
[REDACTED]

## 6. Third Party Vendors

6.1. [REDACTED]

6.1.1. [REDACTED]  
[REDACTED]

## 7. Backups

7.1. [REDACTED]

7.1.1. [REDACTED].

7.1.2. [REDACTED]  
[REDACTED].

7.1.3. [REDACTED]  
[REDACTED].

## 7.2. Storage

7.2.1. [REDACTED]  
[REDACTED].

## 7.3. Testing

7.3.1. [REDACTED].

7.3.2. [REDACTED].

7.3.3. [REDACTED]  
[REDACTED]  
[REDACTED]

## 8. Employee Workstations and Devices

8.1. [REDACTED]

8.1.1. [REDACTED].

8.1.2. [REDACTED]  
[REDACTED]

## 8.2. Anti-virus & Anti-malware

8.2.1. [REDACTED]  
[REDACTED].

8.2.2. [REDACTED]  
[REDACTED].

## 8.3. Operating System Updates

8.3.1. [REDACTED]  
[REDACTED].

#### 8.4. Programs of unknown integrity

8.4.1. [REDACTED].

#### 8.5. Personal Device Approval

8.5.1. [REDACTED]  
[REDACTED].

#### 8.6. Device Return

8.6.1. [REDACTED]  
[REDACTED].

8.6.2. [REDACTED]  
[REDACTED].

8.6.3. [REDACTED].

#### 8.7. Suspicious and Virus Activity Reporting

8.7.1. [REDACTED]  
[REDACTED].

8.7.2. [REDACTED]  
[REDACTED].

### 9. Office Security

#### 9.1. Physical Security

9.1.1. [REDACTED].

9.1.2. [REDACTED].

9.1.3. [REDACTED]  
[REDACTED].

#### 9.2. Wifi Security

9.2.1. [REDACTED].

9.2.2. [REDACTED].

#### 9.3. Visitors

9.3.1. [REDACTED]  
[REDACTED]:

9.3.1.1. [REDACTED].

9.3.1.2. [REDACTED].

9.3.1.3. [REDACTED].

9.3.1.4. [REDACTED].

## 10. Email Security

### 10.1. General

10.1.1. [REDACTED]

10.1.2. [REDACTED].

10.1.3. [REDACTED].

10.1.4.

## 11. Server Security

### 11.1. Logical Security

11.1.1. [REDACTED]  
[REDACTED]

### 11.2. Physical Security

11.2.1. [REDACTED].

11.2.2. [REDACTED]  
[REDACTED]

### 11.3. Vulnerability & Patch Management

11.3.1. [REDACTED]  
[REDACTED].

11.3.2. [REDACTED]  
[REDACTED]

11.3.3. [REDACTED]  
[REDACTED].

11.3.4. [REDACTED]  
[REDACTED].

11.3.5. [REDACTED]  
[REDACTED]

11.3.6. [REDACTED]  
[REDACTED].

11.3.7. [REDACTED]  
[REDACTED].

11.3.8. [REDACTED].

11.3.9. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

11.3.10. [REDACTED].

11.3.11. [REDACTED]  
[REDACTED].

11.3.12. [REDACTED]  
[REDACTED].

#### 11.4. Server Configuration

11.4.1. [REDACTED]  
[REDACTED].

11.4.2. [REDACTED]  
[REDACTED].

11.4.3. [REDACTED]  
[REDACTED].

11.4.4. [REDACTED]  
[REDACTED].

11.4.5. [REDACTED].

11.4.6. [REDACTED]  
[REDACTED].

11.4.7. [REDACTED]  
[REDACTED].

#### 11.5. Network Configuration

11.5.1. [REDACTED]

11.5.2. [REDACTED]  
[REDACTED].

11.5.3. [REDACTED]  
[REDACTED].

11.5.4. [REDACTED]  
[REDACTED]

11.5.5. [REDACTED].

11.5.6. [REDACTED]  
[REDACTED].

11.5.7. [REDACTED].

11.5.8. [REDACTED].

11.5.9. [REDACTED].

## 11.6. Services

### 11.6.1. General

11.6.1.1. [REDACTED]

11.6.1.2. [REDACTED].

11.6.1.3. [REDACTED]

11.6.1.4. [REDACTED].

11.6.1.5. [REDACTED]  
[REDACTED].

11.6.1.6. [REDACTED].

11.6.1.7. [REDACTED].

### 11.6.2. Web Services

11.6.2.1. [REDACTED]  
[REDACTED].

## 11.7. Development System Policies

11.7.1. [REDACTED]  
[REDACTED].

11.7.2. [REDACTED].

## 11.8. Intrusion Detection

11.8.1. [REDACTED]  
[REDACTED]

## 11.9. Penetration Testing

11.9.1. [REDACTED].

11.9.2. [REDACTED].

11.9.3. [REDACTED]  
[REDACTED].

11.9.4. [REDACTED].

11.9.5. [REDACTED]  
[REDACTED].



#### 11.10. User Access

11.10.1. [REDACTED]

11.10.2. [REDACTED].

11.10.3. [REDACTED].

#### 12. Access Control

##### 12.1. General

12.1.1. [REDACTED]  
[REDACTED].

12.1.2. [REDACTED]  
[REDACTED].

12.1.3. [REDACTED]  
[REDACTED].

12.1.4. [REDACTED]  
[REDACTED].

##### 12.2. Minimal Access Required

12.2.1. [REDACTED]  
[REDACTED].

12.2.2. [REDACTED]  
[REDACTED].

##### 12.3. Separation of Duties

12.3.1. [REDACTED].

12.3.2. [REDACTED].

12.3.3. [REDACTED].

##### 12.4. Onboarding

12.4.1. [REDACTED]  
[REDACTED].

##### 12.5. Role Change

12.5.1. [REDACTED]  
[REDACTED].

##### 12.6. Account Locking

12.6.1. [REDACTED].

12.6.2. [REDACTED].

## 12.7. Termination

12.7.1. [REDACTED]  
[REDACTED]

## 12.8. Access Review

12.8.1. [REDACTED]

12.8.2. [REDACTED]  
[REDACTED].

12.8.2.1. [REDACTED]

12.8.3. [REDACTED]  
[REDACTED].

## 12.9. Logging and Tracking

12.9.1. [REDACTED]  
[REDACTED]

## 13. Password Security

13.1. [REDACTED]

13.1.1. [REDACTED]  
[REDACTED].

## 13.2. Password Change Frequency

13.2.1. [REDACTED]

## 13.3. Password Strength Requirements

13.3.1. [REDACTED]  
[REDACTED]  
[REDACTED].

13.3.2. [REDACTED].

## 13.4. Password Entry

13.4.1. [REDACTED].

## 13.5. Password Resetting

13.5.1. [REDACTED]

13.5.2. [REDACTED].

13.5.3. [REDACTED].

## 13.6. Password Storage

- 13.6.1. [REDACTED]
- 13.6.2. [REDACTED].
- 13.6.3. [REDACTED]
- 13.6.4. [REDACTED].
- 13.6.5. [REDACTED].
- 14. Database Security
  - 14.1. General
    - 14.1.1. [REDACTED].
- 15. Data Encryption or Protection Requirements
  - 15.1. [REDACTED]
    - 15.1.1. [REDACTED].
  - 15.2. Allowed Protocols
    - 15.2.1. [REDACTED].
  - 15.3. Non-text based data transfer
    - 15.3.1. [REDACTED]  
[REDACTED].
- 16. PCI Compliance
  - 16.1. General
    - 16.1.1. [REDACTED].
- 17. Copyright Compliance
  - 17.1. General
    - 17.1.1. [REDACTED].
    - 17.1.2. [REDACTED].
    - 17.1.3. [REDACTED]  
[REDACTED].
- 18. Program Management
  - 18.1. Security Assessment
    - 18.1.1. [REDACTED]  
[REDACTED]
- 19. Code Security

## 19.1. Change Management

19.1.1. [REDACTED]  
[REDACTED].

19.1.2. [REDACTED]  
[REDACTED].

19.1.3. [REDACTED].

19.1.4. [REDACTED].

19.1.5. [REDACTED].

19.1.6. [REDACTED]  
[REDACTED].

19.1.7. [REDACTED]  
[REDACTED].

## 19.2. Training

19.2.1. [REDACTED].

## 19.3. SDLC

19.3.1. [REDACTED].

19.3.2. [REDACTED]  
[REDACTED]

19.3.3. [REDACTED]  
[REDACTED].

## 19.4. Testing

19.4.1. [REDACTED]  
[REDACTED]

## 19.5. Code Review Requirements

19.5.1. [REDACTED]  
[REDACTED].

19.5.2. [REDACTED].

19.5.3. [REDACTED]  
[REDACTED].

19.5.4. [REDACTED]  
[REDACTED] use.

## 19.6. Source Code Control

19.6.1. [REDACTED]  
[REDACTED]

19.6.2. [REDACTED].

19.6.3. [REDACTED]  
[REDACTED].

19.6.3.1. [REDACTED].

19.6.3.2. [REDACTED]

19.6.3.3. [REDACTED]  
[REDACTED]

19.7. Deployment

19.7.1. [REDACTED].