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Blue Star Energy, LLC

Emergency Operations Plan (EOP)

Version 1.0

4/14/2022

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Revision History

Name	Reason for Changes	Approved by	Approved Date	Version
Kevin Weber	Creation of document	James C. Petersen	4/14/2022	1.0

4/14/2022 - Version 1.0 of Blue Star Energy's EOP is approved, in effect per the Approved Date above and supersedes any previous versions.

Drill Execution History

Drills are conducted once per year, PUCT Commission shall be notified 30 days in advance of Drill. If the EOP is activated in a calendar year, no Drill is required for that calendar year.

Drill Date	Drill Coordinator	Drill Location	Approved Date	Version

Introduction

In accordance with Texas Administrative Code (TAC) §25.53, Blue Star Energy has filed this summary of its Emergency Operations Plan (EOP). The purpose of this document is to formally establish a plan that can be enacted in the event of an emergency to ensure clear roles and responsibilities for employees executing the plan as outlined to ensure business continuity and resiliency.

Given the fact that Blue Star Energy is not yet actively marketing to or serving customers, this EOP may be further updated after we are operational.

EOP Maintenance and Implementation

The following employees are:

- Responsible for the upkeep and implementation of the EOP:
 - Addison Ingle, Manager of Operations
 - Kelley Madden, Director of Operations
 - Kevin Weber, Managing Director of Operations
- Responsible for review and approval of the EOP:
 - Joyce Williams, Vice President Customer Operations and Communications
 - or
 - James C Petersen, Vice President Strategy & Investments

Communication Plan

Blue Star will leverage the following communication mediums for each respective audience in an emergency.

- **Public**
 - Should we need to communicate more broadly to customers or prospective customers we would do so leveraging our website by posting pertinent messages in a prominent spot on our site, on our home page or a specific dedicated page (or both) depending on the nature of the emergency.
- **Media**
 - We leverage internal/non-utility resources to assist with media messaging. Resources include Corporate Communications employees as well as enterprise-level tools to track media coverage including social media. We have the ability to post to and respond to social media posts or reach out to local media proactively or in response to coverage involving Blue Star Energy.
- **Customers**
 - We leverage email as our main communication medium in the event of an emergency but also leverage telephonic communications and social media to ensure our customers have the information they need to continue conducting business with us in the event of an emergency. Should Customers call into our internal Contact Center, we have the ability to share emergency messages via our Interactive Voice Response (IVR) system as well as field calls, emails and chats. Should call volume increase well-beyond normal levels or the emergency

prevents our internal Contact Center from field Customer inquiries, we have an overflow answering service to ensure Customers can provide feedback or present their request for future follow-up by our internal Contact Center Advocates.

- **Customer Complaints**
 - We have a dedicated Customer Complaints department including a main point-of-contact and a backup. We also have a team of Contact Center Advocates and Operations staff that could fill-in for primary and backup employees or staff augment their roles to scale the amount of customer complaints received during an emergency.
- **PUCT**
 - Should Blue Star Energy implement it's EOP, we shall notify the PUCT as necessary and per TAC §25.53 notification requirements.
- **OPUC**
 - Should Blue Star Energy implement it's EOP, we shall notify the OPUC as necessary and per TAC §25.53 notification requirements.

Emergency Response Supplies

Blue Star Energy's employees are generally a distributed workforce and can be a full-time distributed workforce working from both our offices, employee's homes and other remote locations. At the office, should employees need to stay due to an emergency, we have facilities that would allow employees to remain productive at the office should that be required including food, showers, shelter and a work environment in a building with resiliency including local power generation backup. We also have redundancy as far as computer equipment is concerned. Each employee is allocated a laptop with peripherals and multiple monitors. Should one component fail (e.g. a monitor or a keyboard) a backup exists to keep that employee working. Should there be a failure of their laptop and, during an emergency, getting a new laptop to that employee in a timely manner is not possible we have the ability to provision a virtual machine for that employee, allowing them to remote in from a personal device using secure methods to allow them to continue working.

Emergency Response Staffing

Our Contact Center and the majority of our Operations team is now fully remote and distributed. We also have multiple facilities where an employee can work should their remote location be impacted by an emergency situation or hazard. Lastly, we also have third party answering service in the event of Contact Center staffing shortages and/or exponentially higher call volumes.

Weather Related Hazards

Blue Star Energy's related entities have weather forecasters on-staff continually monitoring the weather in our footprint. Should adverse and potentially hazardous weather be forecasted in our footprint, our EOP may be activated largely resulting in employees working remotely, where safe, or potentially coming into the office should that be a safer space than their remote location. Should a potential threat be forecasted, those employees responsible for the EOP implementation shall make the call to activate the EOP and prepare for a potential weather hazard.

REP Annexes

Pandemic and epidemic response

Given the recent COVID-19 pandemic, Blue Star Energy's pandemic plans have become extremely robust to include working remote, wearing masks, deploying Personal Protective Equipment (PPE) like gloves, and antibacterial solutions and enforcing social distancing through defined processes and procedures, employee communications and posted signage in the office.

Hurricane response

Blue Star Energy's offices are not located in a Hurricane evacuation zone as defined by TDEM (page 25 for reference).

Cybersecurity response

Blue Star Energy leverages shared corporate resources via our service agreements with our affiliate, American Electric Power Service Corporate for cybersecurity resources and support. Considerable resources have been deployed to counteract cybersecurity events to avoid and defend from an attack. Should they penetrate our network, process and procedures exist to isolate and recover from an event.

Physical security response

Blue Star Energy leverages shared corporate resources via our service agreements with our affiliate, American Electric Power Service Corporate for physical security. Also, given our largely remote and distributed workforce as well as our infrastructure redundancies, we are well poised to continue operations in the event of a physical security event.

EOP Process Improvement

In the event Blue Star's EOP is activated, an After Action Review should occur documenting the event including what went well and what areas can be improved. Improvements should be incorporated into the EOP where necessary.

APPENDIX

A1) After Action Review Report Template

An After Action Review should be completed after every event and exercise. An after action review guide and a copy of the report template are located at <http://Crisis/Core-Plan/> . For facilitation assistance please notify Crisis Response.

After Action Review Report Template v3 2019 04 01.doc

Background:

1. Event Name: _____

2. Event Reviewed:

--

3. Date of Review: _____

4. When review was completed:

☐ During Event/Exercise

☐ After Event/Exercise Completion

5. AAR Participants

NAME	JOB TITLE	ROLE IN TEAM
		Facilitator
		Incident Commander

6. Please provide a summary of your event

--

7. What went well and why?

(What were the successful steps taken towards achieving your objective?)

[illegible]

8. What can be improved and how?

(What could have been done better? What can we do differently in similar situations in the future to ensure success? What would be your advice to future project teams?)

[illegible]

Reference No.	Identified Issue/Observation	Priority (H,M,L)	Owner	Recommended Actions	Due Date	Status
1	It was not always clear what information should be shared with the IMT	H	John Doe	Develop annex checklist of items to share the IMT	01/01/2016	
2						
3						
4						
5						
6						



Blue Star EOP Affidavit.pdf

DocVerify ID: D224A881-E14B-4A05-BD20-FFD6ED944B05
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E-Signature Summary

E-Signature 1: James C. Petersen (JCP)

April 15, 2022 09:07:25 -8:00 [01012126E9C0] [167.239.221.106]
 jpetersen@aepenergy.com (Principal) (Personally Known)

E-Signature Notary: Kristina L. Woods (klw)

April 15, 2022 09:07:25 -8:00 [4C32CB4EF253] [167.239.221.104]
 kwoods@aepenergy.com
 I, Kristina L. Woods, did witness the participants named above electronically sign this document.



AFFIDAVIT

State of Ohio)

County of Franklin)

I, James C. Petersen, being duly sworn, state that I am Vice President of Blue Star Energy LLC. In this position, I have personal knowledge of the facts stated herein, and I affirm that, to the best of my knowledge and belief:

- i. Relevant operating personnel are familiar with and have received training on the applicable contents of the emergency operations plan ("EOP") as reflected in this filing, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
- ii. The EOP has been reviewed and approved by the appropriate executives;
- iii. Drills will be conducted to the extent required by the Public Utility Commission of Texas Substantive Rule 25.53(f);
- iv. The Company maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- v. Personnel who interact with local, state, and federal emergency management officials during emergency events will receive IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Signature: James C. Petersen

James C. Petersen

Sworn to and subscribed before me, a notary public in and for the State of Ohio this

15 day of April, 2022.

Kristina L Woods
Signed on 2022/04/15 09:07:25 -8:00

Notary Public Signature



Notarial act performed by audio-visual communication