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EMERGENCY OPERATIONS PLAN

-for-

LPT LLC

*In compliance with the requirement for filing an EOP under
PUCT Project No. 53385*

*Filed:
15 April 2022*

Executive Summary

relating to the

Emergency Operations Plan (EOP)

for

LPT LLC

an REP operating in ERCOT

*In compliance with the requirement for filing an EOP under
PUCT Project No. 53385*

This is the emergency response plan for LPT LLC. This is the plan for LPT LLC for how to respond to any and all emergencies which have the potential to or actually do, impact LPT LLC's operations or customers.

The plan was reviewed and approved by the leadership team, led by the CRO on March 31, 2022. Subsequently, the plan was distributed to all employees on April 1, 2022.

The plan addresses all of the required elements including: approval and implementation (page 3), communication plan (page 3), supplies plan (page 3), staffing plan (page 4), hazard monitoring and EOP activation process (page 4), drills (page 4), emergency contacts (page 4), emergency contacts (page 4), and plan distribution (page 4), CRO Affidavit (page 7).

EMERGENCY OPERATIONS PLAN

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LPT LLC

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1. Approval and Implementation

This emergency operations plan applies to all instances which could or do disrupt normal operations due to an emergency. Those responsible for the implementation and ongoing compliance with this plan include the following personnel:

- Chief Restructuring Officer
- Chief Legal Officer
- Chief Risk Officer
- Chief Operations Officer
- Chief Human Resources Officer
- Chief Financial Officer
- Director of Customer Service

This plan was approved by the aforementioned officers on March 31, 2022.

This is Version One of LPT LLC's EOP.

2. Communication Plan

Public Communication: Chief Restructuring Officer

Media: Chief Restructuring Officer

Customers: Chief Operations Officer

State Officials, PUCT, and OPUC: Chief Legal Officer

For any issues impacting service to customers, the Chief Legal Officer will notify all state officials, the PUCT, and OPUC. Any and all complaints will continue to be received through the company's customer service mailbox available on its website and through its customer service call center. Responses will be led by the Chief Operations Officer and Chief Restructuring Officer, depending on the issue.

The officers designated above are the communications leaders for those areas under the direction of the CRO. In the case that one or more of the above officers are unable to undertake those duties, the CRO may appoint someone to handle those duties.

3. Supplies Plan

LPT LLC maintains a local office at 5858 Westheimer Road, Suite 500, Houston, Texas, 77057. The Chief Operations Officer is responsible for maintaining normal operations at that office, including the receipt of mail in the instance of an emergency. LPT LLC's parent maintains a virtual office with employees spread out in different locations, but largely located in Florida. On a semi-annual basis, commencing on July 1, 2022, all employees are to take stock of their work

supplies and materials and report to the Chief Operations Officer any needs they have to fulfill their duties in the instance that there is an emergency. The Chief Operations Officer is responsible for working with the local Texas office to ensure supplies are sufficient.

4. Staffing Plan

It is the responsibility of the personnel listed in Section One to ensure that the company has adequate staffing to maintain operations. Those personnel are required to plan for unanticipated contingencies with contractors capable of backfilling in case of an emergency. Ultimately, the CRO is responsible for addressing any deficiencies in staffing due to an emergency.

5. Hazard Monitoring and EOP Activation Process

LPT LLC has personnel throughout the State of Florida working remotely. In anticipation of weather-related event, the company will ensure that its contact lists are updated. During and after the event, personnel are required to check in to ensure that they are safe and can work safely. The plan is activated based on the severity of the anticipated event by the CRO, in consultation with the other chief officers.

6. Drills

Drills are to be conducted under the direction of the Chief Operations Officer, on an as needed basis, but not less than once per quarter commencing on July 1, 2022.

7. Emergency Contacts

Robert Butler, Chief Restructuring Officer: 678-575-4864
Stephen Gibelli, Chief Legal Officer: 954-864-1519
Shane McDonald, Chief Operations Officer: 214-454-0950

8. Distribution

The EOP was distributed to all personnel commencing on April 1, 2022. Training will commence sometime after the EOP has been filed with the PUCT on or about April 15, 2022. Subsequently, every new employee will receive the EOP and training on the EOP within 30 days of the commencement of their employment.

The company will maintain a spreadsheet of all employees who have received the EOP and training. An example is included below:

<u>Employee Name</u>	<u>Title</u>	<u>EOP Received</u>	<u>EOP Training</u>	<u>Refresher Training</u>
Aaron Ekblad	Director of Marketing	4/15/22	4/22/22	3/2/23

Alex Barkov	Counsel	5/6/22	5/19/22	1/2/23
Claude Giroux	Manager of Customer Relations	7/1/22	7/6/22	1/2/23
Jon Huberdeau	Financial Analyst	4/23/22	4/24/22	

9. Annexes

(a) Pandemic and Epidemic Annex

LPT adheres to the CDC guidelines and ensures that our people are safe when working from, the offices. We encourage staff to work from home whenever possible so their home offices when there is any type of health threat present in our environment. We had made investments in our IT infrastructure that allows 100% of staff to work from home.

(b) Hurricane Annex

LPT has robust notification capabilities via voice, email and text message to our end customers and employees. Typically starting out 3 to 4 days prior to the event we send notifications alerting customers to prepare for the Hurricane. We notify/alert our near shore teams to ensure that we have extra coverage in case there are employees that loose power and cannot support or end customers. We typically continue to message our customers through the end of the weather event. A leadership daily stand up call that is put into action 3-4 days prior to the hurricane landfall date. This team includes Operations, IT, Legal, Finance and Risk and the focus of these calls is to access the operations and staff reediness.

(c) Cyber Security Annex

LPT utilizes CrowdStrike Falcon Complete solution to monitor all servers and endpoints. This solution includes an active agent deployed to each server and end point (e.g. employee laptops, desktops and other staff computers) and is monitored 24/7 for active threats. The CrowdStrike team is composed of seasoned security professionals with experience in incident handling, incident response, forensics, SOC analysis, identity protection and IT administration. The team has a global footprint, allowing true 24/7 coverage.

Powered by the Falcon Platform

100% cloud-native. The Falcon platform delivers immediate time-to-value — no hardware, additional software or configuration is required, which drives down cost and complexity.

CrowdStrike Security Cloud. The CrowdStrike Security Cloud® is the brains behind the Falcon platform, providing complete real-time visibility and insight into everything happening on your endpoints throughout your environment.

Single lightweight agent. The intelligent, lightweight Falcon agent, unlike any other, blocks attacks while capturing and recording endpoint activity as it happens to detect threats fast.

Protection for endpoints, cloud workloads and identities. Enables frictionless endpoint, cloud workload and identity security, delivering real-time threat prevention and IT policy enforcement using identity, behavioral and risk analytics.

The Falcon Complete team meets once a month with the LPT IT leaders to review the activity and intrusion detection if there is no immediate attention required.

If there is immediate attention required, the Falcon team will contact LPT senior systems engineer Miguel Perez or William Nevis to isolate a server or end user machine. If the detection is after normal business hours or weekends the Falcon team is authorized to isolate the server or end user machine from the LPT network.

(d) Physical Security Annex

LPT utilizes key card entry for all entrance into the office building. Each employee is issued a key card that there are not allowed to share with anyone. There is also closed circuit cameras at the entrance of the building in case there is need to review footage.

There is a receptionist in the front of the office so all visitors are required to checkin and provide some form of government issued ID before they are allowed into the offices.

BOB BUTLER
AFFIDAVIT
"LPT LLC EOP"

STATE OF GA
COUNTY OF Fulton

BOB BUTLER, Affiant, being duly sworn/affirmed according to law, deposes and says that:

1. I am the Chief Restructuring Officer of Liberty Power Holdings LLC;
2. I have binding authority over LPT LLC;
3. I am authorized to and make this Affidavit for LPT LLC;
4. The EOP has been reviewed and approved by the senior leadership team;
5. The EOP has been distributed to all employees;
6. Relevant personnel have had training or will have training on the EOP;
7. Drills have been/will be conducted to the extent required and as articulated in the EOP;
8. The EOP or an appropriate summary will be distributed to local jurisdictions as needed;
9. LPT LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident;
10. LPT LLC's staff responsible for interacting 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.

Bob Butler
Signature of Affiant

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

D. Ni
Signature of official administering oath

Srigowri Nallamothu
Print Name

My Commission Expires 05/02/2025

