



## **Filing Receipt**

**Filing Date - 2024-04-05 09:31:24 AM**

**Control Number - 53385**

**Item Number - 2414**



April 5, 2024

Public Utility Commission of Texas  
Attn: Central Records  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326

Alex Gilbert  
Regulatory Reporting Analyst  
Titan Gas, LLC DBA CleanSky Energy  
814-297-0560  
agilbert@cleanskyenergy.com

**RE: Project No. 53385,**

**Project to Submit Emergency Operations Plans and Related Documents under 16 TAC§ 25.53**

To Whom It May Concern:

Titan Gas, LLC DBA Titan Power & gas DBA CleanSky Energy submits this filing to comply with 16 Tex. Admin. Code (TAC)

This filing includes:

1. An affidavit from Alan Biney
  - a. attesting that no changes were made to the EOP that materially affect how Titan Gas, LLC would respond to an emergency; and,
  - b. providing the affirmations required by 16 TAC§ 25.53(c)(4)(C).
2. Attachment A updating Titan Gas, LLC's Emergency Contacts.
3. Executive Summary of the EOP

Should you have any questions regarding this filing, please contact me at me at 814-297-0560 or agilbert@cleanskyenergy.com.

Best Regards,

A handwritten signature in cursive script that reads "Alex Gilbert".

Alex Gilbert

Regulatory Reporting Analyst

Enclosure


## AFFIDAVIT OF ALAN BINEY

STATE OF TEXAS                   §  
  §  
COUNTY OF HARRIS           §

BEFORE ME, the undersigned authority, on this day personally appeared Alan Biney who, being duly sworn deposed and stated as follows:

1. My name is Alan Biney. My business address is 3355 West Alabama St, Suite 500, Houston, TX 77098. I am over eighteen (18) years of age. I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
2. I am the highest-ranking representative with binding authority over Titan Gas, LLC DBA Titan Power DBA CleanSky Energy.
3. Titan Gas, LLP submitted the Executive Summary and redacted Emergency Operations Plan for Titan Gas, LLC (EOP) on April 5, 2024 in Project No. 53385, Item 8. On the same day, Titan Gas, LLC submitted the non-redacted EOP to the Electric Reliability Council of Texas.
4. I hereby attest that no changes were made to the EOP that materially affect how Titan Gas, LLC would respond to an emergency.
5. On behalf of Titan Gas, LLC, I affirm the following:
  - Relevant operating personnel are familiar with, and have received training, on the applicable contents and execution of the EOP. 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 in the course of an emergency.
  - ii. The EOP has been reviewed and approved by the appropriate executives.
  - iii. Titan Gas, LLC complies with the requirements for drills contained within the Commission's Emergency Operations Plan rule, subsection (f). In 2022 and 2023, drills were conducted, and Titan Gas, LLC activated emergency procedures for a hurricane. Titan Gas, LLC will comply with the requirement for REPs to provide notification 30 days prior to a drill.
  - iv. The EOP or a summary will be distributed to local jurisdictions if deemed necessary.
  - v. Titan Gas, LLC maintains business continuity plans that cover our corporate functions and retail operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.

- vi. The relevant emergency management personnel who are designated to interact with emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training.

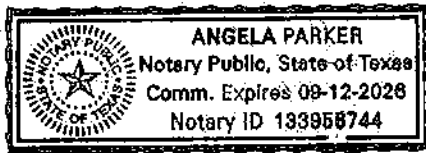
  
Alan Biney

President, Titan Gas, LLC

SUBSCRIBED AND SWORN TO BEFORE ME on the 5th day of April 2024 to certify which witness my official hand and seal of office.



Notary Public in and for the State of Texas



My Commission Expires

9-12-2028



## Attachment A

### List of Emergency Contacts

President	Alan Biney	<a href="mailto:abiney@cleanskyenergy.com">abiney@cleanskyenergy.com</a> Office: 346-327-3100 Cell: 832-320-0000
Controller	Joseph Ferrara	<a href="mailto:jferrara@cleanskyenergy.com">jferrara@cleanskyenergy.com</a> Office: 346-327-3107 Cell: 954-494-1352
CCO	Rob Moss	<a href="mailto:rmoss@cleanskyenergy.com">rmoss@cleanskyenergy.com</a> Office: 281-501-7252 Cell: 281-450-1866
CMO	Ashley Frankart	<a href="mailto:afrankart@cleanskyenergy.com">afrankart@cleanskyenergy.com</a> Office: 346-327-3108 Cell: 919-795-9443
COO	Yara Abdur-Rahman	<a href="mailto:yrahman@cleanskyenergy.com">yrahman@cleanskyenergy.com</a> Office: 346-327-3106 Cell: 713-505-6520
CIO	Jeff Savoie	<a href="mailto:jsavoie@cleanskyenergy.com">jsavoie@cleanskyenergy.com</a> Office: 346-327-3119 Cell: 832-314-9528
Director, Business Operations	Milton Richard	<a href="mailto:mrichard@cleanskyenergy.com">mrichard@cleanskyenergy.com</a> Office: 346-327-3109 Cell: 713-569-7163
Chief Regulatory and Compliance Officer	Andy Beauchamp	<a href="mailto:abeauchamp@cleanskyenergy.com">abeauchamp@cleanskyenergy.com</a> Office: 346-327-3128 Cell: 713-208-7569
Manager, IT	Joey Perez	<a href="mailto:jperez@cleanskyenergy.com">jperez@cleanskyenergy.com</a> Office: 346-327-3116 Cell: 281-383-8070
Manager of the Customer Advocate Office	Audrey Estrada	<a href="mailto:aestrada@cleanskyenergy.com">aestrada@cleanskyenergy.com</a> Office: 346-327-3113 Cell: 713-377-0526

PROJECT NO. 53385

**EMERGENCY OPERATIONS PLANS  
AND NOTIFICATION OF  
EMERGENCY OPERATIONS EXERCISES**

**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**TITAN GAS, LLC DBA CLEANSKY ENERGY COMPLIANCE FILING PURSUANT TO  
P.U.C. SUBSTANTIVE RULE§ 25.53**

CleanSky Energy has a comprehensive integrated Business Continuity Plan which maps out strategies and tactics to manage business operations through disruptions impacting its critical processes. Planning considers impacts on our workforce, facilities, and technology. A high-level overview of this plan is attached.

CleanSky Energy's action plan focuses on the protection of its employees and customers, and the maintenance of essential services. The plan establishes clear protocols for the continuation of safe business operations and sets up a communications and command structure that enables our organization to mobilize and respond to change quickly and effectively.

CleanSky Energy routinely conducts risk assessments, business impact analysis, and security assessments that drive an annual preparedness schedule. These evaluation activities guide planning and preparedness efforts to address natural disasters, technological/man-made incidents, and adversarial incidents.

CleanSky Energy maintains a series of integrated teams and plans. The office maintains an emergency response plan that details the protocols to take when an immediate hazard threatens life, safety, or company assets. In addition, key business teams also maintain an incident management plan. This type of plan addresses the command-and-control elements for ensuring operations that includes process recovery and operational continuity.

The Site Emergency Response Plan for the West Alabama Houston Office (Corporate Headquarters) is attached. Additionally, CleanSky Energy maintains a crisis management plan for all of North America. This plan addresses the command-and-control elements for managing response, recovery as well as interested parties, stakeholders, and media communications. In addition to the annual plans and training, CleanSky Energy conducts routine drills and exercises.

An affidavit is attached that affirms CleanSky Energy is prepared to implement any or all of these plans. If you have any questions about the plan, please contact me at [yrahman@cleanskyenergy.com](mailto:yrahman@cleanskyenergy.com) or by phone at 346-327-3106.

Sincerely,



Yara Abdur-Rahman  
Chief Operations Officer