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INTRODUCTION & APPROVAL

The order of priority when preparing for an emergency, severe summer/winter storm, or hurricane is as follows:

- (1) Protect human life;
- (2) Seek to prevent or minimize personal injury;
- (3) Reduce the exposure of property to damage;
- (4) Minimize damage to property that cannot be relocated, and
- (5) Seek to restore normal operations as quickly as possible.

Maintaining a workable plan that can be implemented in a timely and effective manner is the key ingredient in accomplishing these prioritized goals.

In the case of a hurricane, summer/winter storm, or other natural weather event, preparation successfully depends on how easily and orderly actions occurs even if chances are high that we will not be impacted by the storm. Timetables for implementing the various stages of the plan depend on the storm's forward speed/direction, probability of impact, and the expected intensity of the storm and accompanying weather conditions.

The following pages contain information on how to address specific issues. No plan can address every conceivable problem that may be encountered. Recovery personnel must rely on their own knowledge and experience when unexpected issues occur.

The Basic Plan for TNMP will be maintained and approved by the Executive Committee as described later in this plan and in conjunction with each Business Unit's Director. Changes to the Plan will be made by either the Business Unit's Director or a member of the Executive Committee and presented for final approval to the membership of the Executive Committee, which includes all of TNMP's Senior Executive management including its President.

Revision Control and the latest version of the Plan is displayed on the outer cover of the Plan for each area. The previous year's Plan is superseded by the latest listed Plan date accordingly as per the last revision date shown of December 2021 for this Area's plan.

OVERVIEW - HOW TO USE THIS PLAN

The Basic Plan for TNMP presents an overview of the company response, organization, and state-wide policies. It contains policies, guidelines, and procedures to follow before, during, and after an emergency. It also provides more detailed emergency plans and procedures that are divided by Business Unit Areas. Each Business Unit Area contains an individual plan to address unique needs and is customized accordingly. This document is not all inclusive and should be used as a guide.

The information included under separate Business Area plans consist of a list of area personnel including management, emergency contact information, cell phone numbers, duty assignments, contractor contacts and phone numbers, food and lodging information, circuit listings, circuit assignments, vehicle assignments, substation assignments and other information as deemed necessary for that Area plan. Each Area plan could have information not included in other Area plans due to each Area being its own unit. Each Area plan contains Annexes that demonstrate compliance with PUCT Rules, specifically PUCT Rule 25.53 – Electric Service Emergency Operations Plans.

As stated previously, no plan can address every conceivable problem that will be encountered. All TNMP employees can do is prepare in order to limit damages and restore power to our customers as quickly and safely as possible.

When a known major storm is forecast for the Lewisville Area, the Executive Committee consisting of will meet prior to the storms arrival to discuss potential pre-staging needs and activation. Once the determination is made to activate this Plan, local personnel listed in the Plan will take lead and keep the Executive Committee informed as to progress and issues that occur throughout the process.

STORM IDENTIFICATION

Members of TNMP's Executive Committee (primarily the Vice President – Operations and the Vice President – Engineering & Technical Services) continuously monitor local forecasts, advisories from weather entities such as the National Weather Service/NOAA, state agencies (ex., Office of the Governor, PUCT, ERCOT) and TNMP's subscribed weather service, StormGeo, for potential weather events before they occur. These weather events vary but can include tornadoes, hurricanes, extreme cold/hot weather, drought, and flooding. Once the forecasts and/or events are confirmed with a high probability, the Executive Committee will then meet or contact the affected Area's Director and notify them of any pending weather or other emergency event as soon as practically possible so that preparations may begin before the event occurs. However, in many cases weather events or other emergency situations can and do occur quickly with very little preparation time available. TNMP personnel are trained to respond to these events accordingly and may use this plan as guidance.

RESTORATION GUIDELINES

All work that is undertaken must <u>Follow TNMP Safety Guidelines</u>, which are consistent with normal work practices. The Area Field Coordinator shall determine the working hours for all employees involved in restoration efforts and will be responsible for providing fresh teams so that proper rest time is maintained. The Coordinator will also be able to give the approximate number of days that employees would be needed to work during restoration efforts.

CONTACTS: WHEN AND WHO

The Company will assign the Area Field Supervisor to be the initial contact person for each Business Unit. In the event that the Field Supervisor is not available to assume these duties, the Director or someone he/she designates shall perform this duty.

A. LOCATIONS

A.1. PRIMARY/SECONDARY REPORTING LOCATIONS

The Business Unit Management Team will update and enforce this plan. Meetings will occur each night to assess the day's efforts and plan for the next day's activities until normal operations are resumed.

Core Team - The necessity of a core team will be determined by Management and designated personnel.

A.2. STAGING SITES & EQUIPMENT

ASSIGNED TO FIELD SUPERVISORS AND PROJECT LEADERS



B. COMMUNICATIONS

B.1. LOCAL CITY MANAGEMENT

ASSIGNED TO REGIONAL COMMUNITY LIAISON:

Notify Government, Key/Critical Customers, Local and State Government entities, officials, and Emergency Operations centers of event status. Remain in contact with local Emergency Management teams. Contact cities and key customers.

Physical Address:		Telephone Number:	
Mailing Address:		Office Hours:	
Web Address:	www.cityoflewisville.com		
Radio Station:	WPMV 1620AM		

City	Office	Alt. Telephone
City of Lewisville		
		-
		-
		-
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B.2. PUBLIC UTILITY COMMISSION REPORTS

The Public Utility Commission of Texas and the Office of Public Utility Counsel (OPUC) shall be notified as soon as reasonably possible after a significant interruption has occurred. For interruptions lasting longer than 24 hours, updates shall be filed with the Commission at least twice a day, normally by 9:00 AM and 3:00 PM. After the event has concluded, a summary report shall be filed with the Commission within 5 days. Approved reporting forms are available on the PUCT's website. Reports shall be forwarded to the Regulatory Department and the Regulatory Department shall file with the Commission. The Vice President – Regulatory Affairs or his/her delegate will make this notification.

C. PERSONNEL

C.1. LOCAL PERSONNEL PHONE LIST

MANAGEMENT

Name	Title	Cell	Home
	Director T&D Operations		-
	Director TNMP Distribution Engineering		-
	Regional Community Liaison		-
	Field Supervisor		

LEWISVILLE OPERATIONS

Name	Title	PTT	Cell	Home
	ET SR			-
	ET SR			-

	ET5		-
	ET5		-
	ET5		-
	ET5		
	ET5		-
	ET4		-
	ET4		-
	ET3		-
	ET2		-
	ET1		-
	Sr Linespotter		-
	AMS Tech		-
	Material Coordinator	-	-
	Assistant Team III		-
	Sr Forester	-	-
	Safety Consultant	-	-
	Sr Project Leader		
First Call			-
2nd Call			-
CT on Call			-

D. DUTIES AND RESPONSIBILITIES

A duty assignment list shall be developed with employees' specific duties and will be updated annually. Prior arrangements shall be made with all critical outside resources and contractors. Phone numbers and contact names shall be listed and kept current. Assigned personnel tasks are as follows:

• Energy Technicians will be assigned circuits to assess and estimate material and manpower necessary to begin restoration. These assignments will be reported hourly to the Field Supervisor.

D.1. SUBSTATION ASSIGNMENTS

T.I.		
South/Jones	-	
Lakepointe		
Highland/West		-

D.2. OPERATIONS/MANPOWER COORDINATION

ASSIGNED TO FIELD SUPERVISOR/PROJECT LEADER

Employee	Telephone

This position will identify manpower needs from the initial damage assessment and communicate information to the Director and Field Supervisor who will then communicate with the Regional Customer Restoration Coordinator.

D.3. FLEET AND EQUIPMENT COORDINATION

ASSIGNED TO PROJECT LEADER

Employee	Home	Cell

Project Leaders will be assigned the task of identifying and acquiring equipment needed during the reconstruction effort. Resource lists should be maintained regarding contractor rental companies that supply cranes, all-terrain vehicles, excavating equipment, debris removal equipment, aerial patrol equipment, mobile fueling services including a commitment for pre-storm fueling, tire suppliers and tire repair services, generator suppliers, and others.

D.4. FOOD AND LODGING COORDINATION

Employee	Telephone

Assigned the task of maintaining contact lists for motels, restaurants, and catering services that will be available during the restoration effort. Arrangements for food and supplies for crews shall be made upon decision by Management Team. Contracts and agreements, including payment arrangements shall be conducted with these contacts annually as the plan is updated.

D.5. MATERIAL/STORES COORDINATION

ASSIGNED TO MATERIAL COORDINATOR

The Material Coordinator will be assigned the task of coordinating material needs. Material suppliers and transportation resources shall be identified and updated annually. Material Coordinators in other regions shall be used as resources to assist in locating materials. The Project Leader is charged with establishing staging areas for material distribution during major recovery efforts with the intent of providing materials to crews in a timely manner.

Additionally, TNMP's integrated supplier (Irby) maintains off-site from TNMP's facilities a detailed storm stock materials list which is designed to be deployed either pre-or post-storm. The materials list includes the most commonly needed distribution and transmission items (ex., fuses, insulators, crossarms, poles, padmount/pole mounted transformers, etc.) when a storm impacts TNMP's facilities. The stock materials are inventoried each year prior to storm season to verify that the appropriate types and amounts of materials are available. Once it is determined that a potential storm is approaching, the Material Coordinator will contact Irby and notify them of the need to be prepared to supply necessary stock.

D.6. INTERNAL (LOGISTICS & OPERATIONS) COMMUNICATIONS COORDINATOR AND SYSTEM MONITORING

Employee	Telephone

ASSIGNED TO RADIO DISPATCHER

Assigned the task of coordinating communications equipment in order to secure handheld radios, emergency mobile phones, etc. A communication plan for each area should be developed by the

Area and Region Communication Coordinators to identify potential communication facilities that may be used if normal communications are interrupted.

D.7. PUBLIC RELATIONS COORDINATION

Employee	Area of Responsibility	Telephone
	Govt. Officials & Key Customers	
	Govt. Officials & Key Customers	
	MEDIA and General Customer	
	Communication	
Communications On-Call Contact	For use by media AND TNMP	
	employees	

D.8. SECURITY COORDINATOR

ASSIGNED TO SECURITY COORINDATOR

Employee	Home	Cell
	-	

Responsible for arranging security for all the Lewisville offices, all equipment locations, and any company facilities that sustain damage during the storm. (Board up broken windows and repair damaged facilities etc.)

D.9. OFFICE AND CUSTOMER COORDINATION

ASSIGNED TO FIELD SUPERVISOR/PROJECT LEADERS

Employee	Home	Cell
	-	

E. CONTRACTOR CONTACTS

Company	Contact		Services	Terms
		Yes		
			Trees, OH Dist	Bid Only
		Yes		
			Sub XFMR Repairs	Job
		Yes		
			Heavy Hauling	Job
		Yes		
			Dist,Trans,Subs,Hotsticking, Storm work.	

	Yes		
			Yes
		URD, termination, dig-ins	
<u> </u>			
	Yes		
		Transmission/ Distribution	Bid
	Yes		
		Trans,Dist,Sub,URD	Bid
	Yes		
		Pole Restorations	Bid

Yes OH Dist/Transmission Bid/ Hourly Yes Dist/Storm Work OH/URD Dist/Storm Work Yes Distribution/Transmission Contractor who works Texas Storms. Yes Yes Yes Yes Yes OH/URD Dist/Storm Work Yes				
Hourly Yes Distribution/Transmission Contractor who works Texas Storms. Hourly Hou		Yes		
			OH Dist/Transmission	
Yes Dist/Storm Work Yes OH/URD Dist/Storm Work Yes Distribution/Transmission Contractor who works Texas Storms. Hourly/ Bid				,
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Distribution/Transmission Contractor who works Texas Storms. Bid Contractor who works Texas Storms.				
Distribution/Transmission Contractor who works Texas Storms. Bid Contractor who works Texas Storms.				
Contractor who works Texas Storms. Bid Storms.		?		
				Hourly/ Bid
			Storms.	
Yes				
		Yes		

		OH Distribution	Yes
	Yes	URD/Tran/Dist	Unit
		ORD/TTAII/DISt	Offic
	Yes		
		T (D)	Bid and
		Trans/Distribution	Unit
	Yes		
		URD/Pot holing	Bid and Unit
			Offic
	Yes		
		Heavy Hauling	
		Material Supplier	

VEGETATION MANAGEMENT				
EMERGENCY FUEI	_ & TIRE SUPPLII	ER		
E.1. REGION EM	ERGENCY RES	PONSE (COORDINAT	ION

Regional Control Center – (Not to be mistaken for Dispatch Center) – Director/Field Supervisor

Assigned the task of communicating with the Regional Executive Committee at the Regional Control Center.

a) Oil Spill Response Information – TNMP – North Texas

TAS Environmental –

Call Field Supervisor for permission to start clean-up.

b) Abbreviated Spill Reporting Procedures

Call Environmental Services (or ER contractor as appropriate) immediately if the release/spill is:

- 1. Beyond your capabilities;
- 2. is a threat to human health or the environment;
- 3. has impacted a waterway, or
- 4. is PCB-containing mineral oil, a hazardous material, a hazardous waste, or unknown material.

When calling Environmental Services or ER contractor please provide the following information:

- 1. Has the spill affected a waterway (arroyos/ ditches, rivers, streams, ponds, lakes, etc.)?
- 2. Material spilled.
- 3. Volume of spilled material. Provide a MSDS of material if applicable/available.
- 4. Does the spill contain PCBs from the release of used electrical equipment?
- 5. If the spill is from used electrical equipment, please provide manufacturer and serial number of unit(s).
- 6. Has a sample of the spilled material been sent to a lab?
- 7. Has the spill affected residential, industrial, or rural property?
- 8. Address (Street, City, State, Zip Code).
- 9. Name & number of Company Employee making Spill Notification.



E.2. FOOD AND LODGING



LEWISVILLE

Hotel	Location	Telephone

DENTON

Hotel	Location	Telephone

CORINTH

Hotel	Location	Telephone

LEWISVILLE

Restaurant	Location	Telephone

DENTON

Restaurant	Location	Telephone

FLOWER MOUND

Restaurant	Location	Telephone

OTHER					

F. DAMAGE ASSESSMENT-GUIDELINES

F.1. MINOR STORMS

After severe weather moves through the area, the severity of the event should be communicated to the Field Supervisor or Project Leader, who will then need to make several decisions, including:

- 1. Do we need to inform the Director?
- 2. Will we need to inform the officers of a major outage that has lasted over an hour?
- 3. If the storm moves through after hours, do we need to bring in personnel to handle the dispatching?
- 4. Is there enough damage to warrant a documented damage assessment, or will just a patrol of the affected area by the Field Supervisor or Project Leader be enough to predict manpower needs?
- 5. How much manpower is needed, internal and external? Should communication between Field Supervisor's begin now?
- 6. Do we need all the ETs or do we save some for the next shift?

If it is decided that the call volume is too large for normal dispatching procedures and additional manpower will be required to restore service, the following steps will be applied:

- 1. Call the TNMP Business Unit Director and provide information to the Regional Community Liaison.
- 2. At this time, a decision regarding manpower will be made by the Field Supervisor. The Field Supervisor or Project Leader will instruct a designee to patrol the affected area and determine if a further damage assessment by circuit is necessary, with assessment forms and assistance from the Engineers and Designers or just determine manpower needs from his experience and conversations with the personnel in the field. (This will be completed as soon as possible if a

storm rolls through in the middle of the night. At this time, personnel from other regions should be alerted and positioned on stand-by as a precaution). Follow your gut feeling when determining the number of additional ETs, Contractors, and Vegetation Management personnel to be brought in to assist in restoring service. It is important to not trust the call volume; it never hurts to call in "too much" help. The Material Coordinator should be contacted if several poles are down or several transformers are damaged.

- 3. The next step consists of returning to the command post. Depending on how many outages have occurred, additional Designers may need to be called in to assist. As outages are completed, TNMP will reach out to customers to confirm that their power has been restored. TNMP will utilize large maps of our service territories to track out ETs and list their initials on all possible tickets.
- 4. Calls will be dispatched to ETs in the vicinity in which they are working to keep travel times at a minimum. No tickets will be passed out and TNMP will dispatch the calls to the ETs one at a time. For pole change outs and transformer changes, a temporary sketch from ARC/FM or a copy of the maps will be handed to the construction crews with a material list. The next day, all of the outage reports will be made from the tickets.

The work will be prioritized as follows:

- 1. Transmission
- 2. Distribution Feeders by Priority (All should be ranked for priority)
- 3. Critical Load (Water, Sewage, Hospital, Police & Fire)
- 4. Fused Laterals
- 5. Transformers
- 6. Services

F.2. MAJOR STORMS

The Field Supervisor will assess damage within the first 12-2 hours after a storm passes through a specific area. The local Field Personnel/Engineering will complete damage assessment and re-energize critical circuits, if possible. The Field Supervisor and Work Planning Team will review damage assessment sheets every evening. Work packets will be passed out to storm crew representatives the following morning. The assigned crews will follow the following guidelines when restoring power.

- Work with SOC and the substation crews to get the transmission up and running.
- 2. Bring the feeders circuits (backbone) back up starting with the high priority circuits.
- 3. Check all critical load facilities for power after all circuits are energized.
- 4. After the circuits are energized and all critical load facilities are up and running, TNMP will begin working fused laterals. After all laterals are up and running, TNMP will begin working transformers and services.

In a major event, ETs, Designers, Engineers, and Foresters will be assigned to tree trimming crews and utility crews. Each Storm Crew Representative (SCR) will be charged with the following:

- 1. Meeting the crew every morning.
- 2. Leading the crew to the job site.
- 3. Maintaining time sheets.
- 4. Having lunch delivered to the crew (*During all major events lunch will be delivered to job site*).
- 5. Patrolling the area in which the crew is working and re-fusing, etc.
- 6. Obtaining clearances and hot line orders.
- 7. Emergency locates.

G. CRITICAL CIRCUIT LISTING

G.1. CRITICAL FACILITIES LIST

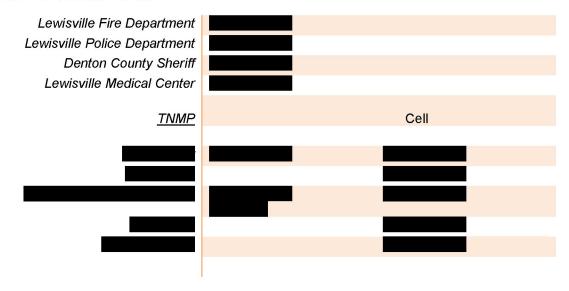
Customer Contacts	Address	Circuit	Telephone
Lewisville Medical Center			
Fire Stations			
Police Department			

	ľ	
Water & Sewer Treatment Plants		
Upper Trinity Water Treatment Plant		
DFW Generation		

G.2. EMERGENCY NUMBERS

During major events, the assigned employees below will perform the assessments and lead restoration for the stations/circuits listed. Employees may possibly use their own personal vehicle(s) to lead contracting crew once restoration begins depending on the size of the event. Mileage will be paid. In smaller events, if in-territory station/circuits are not affected employees will be placed where the outages are located.

EMERGENCY NUMBERS



G.3. OTHER CRITICAL CUSTOMER CONTACTS

ASSISTED LIVING/CARE CENTERS

Customer	Contact	Telephone	Circuit
Key Customers			

G.4. SUBSTATION CIRCUITS – HIGH PRIORITY LISTED IN RED

Substation	Circuit/Customer Count	Priority	UF Block	Critical Load	Notes
	Sound	High		YES	
		High		YES	
-		High		YES	
		High		YES	
		High		YES	
		High		YES	
		High		YES	
		High		YES	
		High		YES	
		High		YES	
		High		NO	
		High		YES	
		High		YES	
		High		YES	

	High	YES	
	High	YES	
	High	YES	
	Medium	NO	
	Low	NO	I

Substation	Circuit/Customer Count	Priority	UF Block	Critical Load	Notes
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	
		Low		NO	

G.5. CRITICAL CARE CUSTOMERS

The residential customers/premises that have complied with all requirements to be designated as Critical Care can be accessed in three ways:

- 1) Through OMS which shows what premises are out and which are designated Critical Care;
- 2) COGNOS report at Customer Account, LSUP Code;

- 3) Through Single Screen Display (SSD), which is available to the DOC operators; and,
- 4) Via the REP Liaison SharePoint site, organized by business unit area and premise. All REP Liaison personnel have access.

Contact	an	ıd/oı
	for assistance	e.

A hard copy is also available in the Lewisville Regional Office.

APPENDIX A

MUTUAL ASSISTANCE LIST COMPANY WIDE

Name	Location	Telephone	Alt. Telephone
	Bogata, TX		
	Clifton, TX		-
	Friendswood, TX		
	Leonard, TX		
	Lewisville, TX		
	Nocona/Olney, TX	-	
	Pecos, TX		
	Princeton, TX		-
	Ruidoso, NM		-
	Silver City, NM		-
	West Columbia, TX	-	
	Texas City, TX		
	Pilot Point, TX		

APPENDIX B

FIELD SUPERVISORS LIST COMPANY WIDE

Name	Location	Telephone	Alt. Telephone
	Pilot Point		
	Lewisville		
	Princeton		
	Central		
	Central		
	Brazos		
	Mainland		
	Bay Area		
	Pecos – WTX North		
	Ft Stockton – WTX South		
	Pecos	-	

ANNEX A

WEATHER EMERGENCY ANNEX FOR RESPONDING TO A COLD OR HOT WEATHER EMERGENCY

SUMMARY

When either a cold or hot weather scenario is forecast to impact the various regions of TNMP's service territory, Emergency Operations Plans (EOP) are in place to address the operating conditions that could accompany such an event. Executive and local management are constantly monitoring conditions as forecast by local meteorological resources, such as the National Weather Service, NOAA, and a subscribed weather service (StormGeo) in order to make the determination of when to either notify resources of potential system issues or fully activate the affected area's Emergency Operations Plan. The goal is to provide each operating area enough notice to assess potential impacts, gauge resources (both human and materials), and develop effective mitigation strategies. The following guidelines are documented and used under a cold or hot weather scenario along with various checklists developed from past weather emergencies.

EXTREME COLD SCENARIO

Typically, a cold weather event is forecast days in advance of impact. The additional time allows for each operating area to evaluate the weather forecast and answer the following three questions:

- 1. What range of temperatures are to be expected?
- 2. Will any forms of precipitation accompany the expected weather (i.e., cold/freezing rain, sleet, snow, or ice accumulation)?
- 3. What is the expected duration of the event?

As discussed in each area's Emergency Operations Plan, during severe weather scenarios TNMP's Executive Committee is responsible for monitoring and evaluating the needed response and communicating with each area's Director in order to begin planning a response and accompanying mitigating actions. Once the three questions are answered to the best of the Executive Committee's evaluation, the operating area's response will be led by that specific area's Director and will include the following first steps:

- 1. An evaluation of existing TNMP resources on hand will be completed (i.e., number of TNMP technicians available in each operating area);
- 2. Determination of what areas are projected to be impacted and whether or not resources should be shifted from one area to another if available to be spared;
- 3. Determination of what outside resources are available and which can be dispatched (i.e., contractors performing work in the area) depending on projected need;
- 4. Determination of materials on-hand once an evaluation of potential damage is completed (i.e., preparations for an ice storm scenario which predicts the need for extensive reconstruction);

- 5. Assessment of needed vegetation management resources due to high wind/freezing precipitation scenarios;
- 6. Discussion regarding the anticipation that TNMP will potentially need additional resources provided from Mutual Assistance groups, and;
- 7. Initial communication to customers regarding the pending forecast, potential impacts, and preparations that TNMP is undertaking.

Once the first steps are complete, assignments are made at the local level to execute Plans based off of the information gathered. Resources are then assigned to the execution of cold weather protocols within TNMP substations and field equipment and include the following checklist items:

- Transmission/Distribution circuit breakers which contain Sulfur Hexafluoride (SF6) gas should be inspected, or the last inspection reviewed to verify sufficient gas pressure;
- Heater circuits in SF6 gas breakers should be tested and verified for functionality;
- Sufficient oil levels and heating equipment for substation transformers and Load Tap Changer (LTC) equipment should be verified;
- Functionality of temperature monitoring equipment is verified (i.e., transformer winding temperature gauges and trip devices);
- Remote monitoring capability via SCADA for critical circuit breaker operating data (i.e., low gas pressure) and temperature monitoring data for substation transformers should be verified by substation personnel and operations personnel at TNMP's System Operations Center (SOC);
- Cold weather additional supplies such as additional SF6 gas/transformer oil is on hand with locations known:
- Locations and conditions of mobile substations are identified and ready if deployment is necessary.

Operations personnel are also simultaneously making the following preparations:

- Materials stock levels are verified and Irby is notified of the potential of impacts to the TNMP system;
- Operations personnel verify resource numbers and accompanying vehicle needs;
- Cold weather gear checklists are verified for field employees (winter FR coats/overalls, proper footwear, gloves, etc.);
- If potentially hosting outside crews lodging and food requirements are determined and secured;

Executive and local management remain in constant communication until the event is concluded. "Lessons Learned" sessions are conducted to evaluate performance and prepare for future events.

EXTREME HEAT SCENARIO

Similar to the cold weather scenario, the hot weather scenario usually provides a sufficient amount of time for TNMP to prepare for the event. Additionally, due to the nature of the Texas climate, TNMP's system is designed to perform in the hot weather scenario since it's the more

likely event to occur. The hot weather scenario tends to lend itself to different initial questions, such as:

- 1. What is the range of temperatures expected and where will they occur across the state?
- 2. Does the temperature range exceed the normal design parameters for TNMP's facilities?
- 3. What is current loading and are any facilities expected to experience overloading or overheating?
- 4. Does each area have a contingency plan to perform field switching to alleviate any facilities prone to overload?
- 5. Although TNMP's system is designed primarily to meet summer loads, do we expect any equipment failures that would require additional staffing beyond normal levels?

Many of the same preparation steps used in the cold weather scenario will be used in the hot weather scenario, including:

- 1. An evaluation of existing TNMP resources on hand will be completed (ex., number of TNMP technicians available in each operating area)
- 2. If needed, determination of what areas are projected to be impacted and whether or not resources should be shifted from one area to another if available to be spared;
- 3. If needed, determination of what outside resources are available and can be dispatched (ex., contractors performing work in the area) depending upon projected need;
- 4. Determination whether or not summer storms will accompany the hot weather and if additional reconstruction materials are needed:
- 5. Initial communication to customers regarding the pending forecast, potential impacts, and preparations that TNMP is undertaking to address additional load resulting from the hot weather.

TNMP technicians will assess the following conditions for TNMP's substation equipment once the first steps are complete:

- Temperature monitoring devices for substation transformers are functional and are remotely monitored at SOC (if capability exists);
- Cooling fans, radiators and oil circulation systems for substation transformers are functional and remotely monitored at SOC (if capability exists);
- Oil levels for substation transformers and Load Tap Changers are verified by field personnel and any issues mitigated;
- Loading points and alarms are functional and are being monitored via SCADA at SOC;
- AC units in each control house are verified as functional as to not impact remote monitoring capability by SOC;
- Additional oil, gas, or other fluids are on hand and available.

Operations personnel remain in a standby position and are ready to respond to any potential switching requests or overload scenarios that occur under the extreme heat scenario. Additionally, Engineering personnel may dispatch Operations personnel to take amp readings or perform voltage checks in the event that loading conditions are observed to be approaching facility ratings. Additionally, Engineering personnel may dispatch Operations personnel to take amp readings or perform voltage checks given loading conditions.

CONCLUSION

TNMP is well-versed and prepared to respond to both the extreme cold and hot weather scenarios as described above. No two weather events are the same, but by utilizing previous experience, maintaining experienced personnel who have deal with prior extreme or severe events, performing effective after-action event reviews, and focusing on continuous improvement TNMP is confident that it will be able to effectively respond to either scenario.

ANNEX B

LOAD SHEDDING, RESTORATION, AND CRITICAL LOAD REGISTRATION PROCEDURES

SUMMARY

TNMP is required by ERCOT protocols to maintain an effective Load Shedding and Restoration Plan in order to maintain ERCOT's system integrity in the event of an emergency. TNMP maintains a documented Load Shed Plan that was created by TNMP's System Planning Department and is utilized by System Operators located at TNMP's System Operations Center (SOC) if necessary. This document is updated annually, and training is performed annually for all of TNMP's System Operators who may be called upon to use it. TNMP utilizes this document to provide evidence of compliance with associated ERCOT and NERC Operating standards, as well. The following excerpt describes the Plan's purpose:

"The purpose of TNMP's Load Shed Plan is threefold. One purpose of the plan is to ensure fulfillment of TNMP's obligation to do its part in arresting frequency decline during EEA 3 conditions within the ERCOT Interconnection. The second purpose of the Plan is to provide guidance to System Operators on what to expect and actions to take following separation of TNMP's transmission systems from the ERCOT interconnection, which may require load shed per this plan. The third purpose of the Plan is to provide System Operators an overview on mitigation of post-contingency SOL exceedances (specifically MVA and kV SOL exceedances) within the TNMP Transmission Operator Area, which may require load shed per this plan."

TNMP works annually with ERCOT to determine the required amount of load which will need to be available for load shed based upon the previous year's ERCOT peak load and TNMP's percentage share of that load during peak. Once the yearly requirement is known, System Planning and technical personnel located at SOC utilize an automated routine within TNMP's SCADA system to select certain feeders across the TNMP system to be included in any load shedding event. These feeders are selected based upon factors including:

- Total load on the feeder;
- Customer types on the feeder, focusing on not including facilities which are critical to life
 and public safety/wellbeing (i.e., hospitals, communications facilities, water/wastewater
 facilities, police stations, etc.) and do not have backup generation;
- Total obligation that TNMP is determined to meet;
- Geographical location of feeders, trying not to focus all feeders in one specific area;
- Other operational concerns impacting electric service delivery (i.e., natural gas customers who are critical for natural gas generation);
- Other potential critical loads;

The following load shed procedures are derived from TNMP's most recent Load Shed Plan and will describe TNMP's procedure for the controlled shedding of load and restoration once the event has concluded and ERCOT has provided notification of the end of the event:

1. EEA 3 - SHEDDING LOAD

When ERCOT calls to direct the shedding of load they will provide a load shed value. The call should be similar to the following:

"ERCOT has implemented EEA Step 3. ERCOT is instructing all Transmission Operators to shed their share of XXXX MWs. Transmission Operators are to report to ERCOT when this task is complete and provide the amount of load shed."

The XXXX MWs (in 100 MW increments) value represents the entire load within ERCOT to be shed. TNMP is responsible for shedding a percentage of this load. TNMP's initial 2021 load shed share was 2.62 MW per 100 MW. On 3/1/22, TNMP's load shed share will increase to 2.67 MW per 100 MW pending ERCOT Operations information.

Once ERCOT has provided the amount of load to shed, TNMPs System Operators shall proceed to Section 2 – Load Shed Application to implement load shedding.

2. LOAD SHED APPLICATION

- a) Proceed to the Load Shed page by clicking on the 'Load Shed' button on the SCADA Station Menu.
- b) The Load Shed Device Summary page will open. The left side of the display shows three tabs which contain instructions associated with the three modes of load shed operations.

i) Begin Initial Shed

This tab is used when the initial notification from ERCOT to shed TNMP's share obligation is received. Follow the display instructions to execute the shed amount. When executed, the program will begin shedding the set amount of load from those circuits with a priority of low and medium. High priority circuits will only be shed when TNMP's obligation is greater than the amount of low and medium priority circuit load. Once initiated, the load shed program will begin rotating outages every 25 minutes. The program will shed the next circuit before restoring the circuits already shed to avoid not meeting the Load to Shed value.

ii) Adjust Shed Amount

This tab is used when ERCOT notifies TNMP that TNMP's share obligation has changed. Follow the display instructions to execute the new shed amount. When executed, the program will begin shedding the new set amount of load when the next scheduled rotation is to begin. The program will shed those circuits with a priority of low and medium. High priority circuits will only be shed when TNMP's obligation is greater than the amount of low and medium priority circuit load. The load shed program will continue the rotating outages every 25 minutes until ended by the operator. The program will shed the next circuit before restoring the circuits already shed to avoid not meeting the Load to Shed value.

ii) Restore (End All Shedding)

This tab is used when ERCOT has made the notification that the load shed event has concluded and all load can be restored. Follow the display instructions to end the load shed rotational outages and restore all load.

- b) The right side of the display has three tabs which contains circuit availability information
 - i) All Circuits
 - ii) Outaged Circuits
 - iii) Available Circuits

3. EEA TERMINATION

ERCOT shall continue EEA until sufficient resources are available to ERCOT to eliminate the shortfall and restore adequate reserve requirements. ERCOT will notify each QSE and TO of EEA level termination and maintain a stable ERCOT System Frequency when restoring load.

4. NOTIFICATIONS TO ERCOT

The TNMP Operator shall advise the ERCOT ISO Operator when each step of EEA load shed is completed, including:

- i) Completion of the initial load shed
- ii) Completion of each load shed adjustment step
- iii) Completion of all restoration (end of all shedding)

PRIORITIES FOR RESTORING LOAD

In the event that load shedding does indeed impact some of the critical customer facilities that are necessary for maintaining the public good and wellbeing, priorities will be placed on restoration as follows:

- Restoration of service that is impacting large-scale medical facilities, retirement homes, or other critical customers who may be on life-supporting equipment and have registered with TNMP as such;
- 2. Industrial customers whose facilities could impact the health and safety of the general public;
- 3. Public works facilities such as water, natural gas, wastewater treatment, or other critical infrastructure;
- 4. Public safety entities such as police, fire, public works, and support facilities;
- 5. Natural gas or other facilities which may be involved in directly supporting electric generating facilities.

These priorities may be subject to change as future rules are enacted or TNMP's customers request or register as critical facilities.

PROCEDURE FOR REGISTERING AS A CRITICAL LOAD CUSTOMER

In order to register as a Critical Load Customer (either as a Residential or Non-Residential customer) forms may be found under the "For Customers" tab on TNMP's company website

(www.tnmp.com) and may be submitted online for processing. Once processed, TNMP will notify the customer whether or not the application is accepted and upon acceptance will add the customer to the list of Critical Load Customer. This list will be reviewed periodically by TNMP's customer support personnel for accuracy and inclusion in load shedding plans. In the event that a Critical Load customer is under an outage condition, an effort will be made to work with the customer to either provide updated outage information to allow the customer to make decisions regarding the need to relocate, request TNMP to aid such as backup generation (if available), and other options required to alleviate the situation. Communications will come in various forms to these customers, up to and including: updated press releases shared with local media (both print and broadcast), phone calls, updates to customer service messaging, updates to TNMP's website (www.tnmp.com), updates to governmental authorities upon coordination with them regarding outage specifics or any combination thereof. Call Center employees who are usually the first points of contact for these customers in an outage scenario are well trained and versed in communicating with these customers and discussing specifics with them.

With respect to natural gas and other customers that are critical to supporting electric generating facilities, TNMP has provided an email address for entities to complete the Railroad Commission's registration form for evaluation of Critical Load designation. That email address is:

and is monitored by TNMP's SOC personnel. Once emails are processed, TNMP will review and evaluate the validity of designation and will then notify the customer of its status. This list is maintained by SOC personnel and will be evaluated biannually (before summer and winter peaks) and will also be part of the load shedding amount to be applied in the load shed program.

ANNEX C

PANDEMIC AND EPIDEMIC RESPONSE PLANS

SUMMARY

As a subsidiary of PNM Resources, Inc., TNMP has composed a Pandemic Management & Overall Strategies Plan, which is managed and administered by PNM Resources' Corporate Security department. The Plan was last updated in April of 2020 but was recently supplemented with various corporate policies, procedures, and specific execution plans related to sequestration of employees, return to work processes, etc., also administered by Corporate Security. The Introduction and Purpose sections of that document read as follows and are applicable to each of TNMP's operating areas:

INTRODUCTION

No one can accurately predict when a pandemic will occur or how severe it will be. However, in order for businesses to minimize economic or negative impact, consideration should be given to the potential spectrum of possible pandemic scenarios as part of disaster preparedness and business continuity planning.

The object of this overview document is to describe the pandemic threat, identify critical operation and business functions, and trigger business planning activities based on the following assumptions:

- A. The timing of the outbreak of a pandemic is uncertain and depends on many factors. A pandemic strain whether influenza or viral will have the following features:
 - 1. It will cause severe disease in humans.
 - 2. The global human population will not have pre-existing immunity to the strain,
 - 3. The strain will be capable of moving rapidly through person-to-person spread.
- B. Once human-to-human transmission begins, the disease will spread very rapidly around the world within three to eight weeks. It is likely that 20 to 30 percent of the global population will contract the illness during the first wave. These people would be very ill for several weeks. Additional waves will occur over the next one to two years.
- C. Absentee rates for employees may be in the range of 25 60 percent for the duration of the pandemic due to illness and other factors such as needing to take care of family members. Absentee rates will not be uniform across an organization and will be caused by employee illness as well as family care issues, inability to get to work, etc.
- D. Given the high percentage of ill people, the existing healthcare system will be overwhelmed. Most government and health organizations will not have sufficient stockpiles of anti-viral agents or vaccines to treat those exposed or who become ill if a pandemic occurs in the next one to two years.

- E. Persons who contract the virus are not expected to contract it a second time due to buildup immunity. However, if the virus mutates, recurrences for the same individual would be possible.
- F. Personnel will need to be managed differently to conduct essential business processes and to minimize the spread of the virus.
- G. It is important to provide accurate and timely information distribution to employees and customers.
- H. Because of the high percentage of affected people around the world, global trade and the global economy will be significantly impacted by the pandemic.
- I. Interdependencies with other segments of the utility sector (generators, transmission operators, distribution providers) and other critical infrastructure (communications, nuclear, natural gas, petroleum, transportation, emergency services, etc.) as well as contractors and suppliers will be severely tested during influenza pandemic.

PURPOSE AND PRIORITIES

This plan directs Pandemic planning, preparedness, response, and recovery actions. The priorities for the Company during a pandemic event will be as follows:

- 1. To protect the health and safety of employees.
- 2. To maintain critical operations and provide essential resources.

This Plan is considered "Confidential" and is maintained at the Corporate Headquarters located in Albuquerque, NM. TNMP formulates various strategies for each of its operating areas to continue business functions in the event of a pandemic or epidemic using this Plan as a guideline. Strategies may include:

- Implementation of "work from home" procedures for employees that can perform their daily functions remotely;
- Implementation of protective strategies for employees that must continue to report to work (i.e., field technicians) such as sanitary contact protocols, Personal Protective Equipment (PPE), implementation of group employee gathering limits, etc.
- Evaluation of the need to execute sequestration plans for "Critical Employees" such as System Operators;
- Communication to Corporate Headquarters the need for supplemental resources or gaps in operational capability and required response;
- Other operational strategies given the risks and severity of the epidemic/pandemic.

Once the proper assessment and evaluation of the current state is complete, TNMP will implement the best strategies as determined by the application of this Plan, as well as Senior/Local Management input and requirements. Communications plans will be formulated to advise various stakeholders of TNMP's situation and operational risks and will include governmental and regulatory authorities as required. Adherence to governmental guidelines regarding response, operations, and mitigation strategies as formulated by various bodies

(Center for Disease Control, Local/State health organizations, etc.) will also be part of business continuity planning and execution.	

ANNEX D

WILDFIRE MITIGATION STRATEGIES & PROCEDURES

SUMMARY

TNMP utilizes a combination of drought condition awareness, notifications from governmental authorities related to drought conditions, monitoring approaching weather systems using meteorological data during high-risk fire conditions, preventative vegetation management, and local coordination with authorities to mitigate and address wildfire scenarios. The TNMP business units that are the most at-risk regarding wildfires are the North and Central Texas business units. However, with the right conditions, the Gulf Coast and West Texas business units could also potentially be subject to a wildfire outbreak. The following strategies and procedures are generally used across all business units to address wildfire mitigation.

COORDINATION WITH LOCAL/STATE/FEDERAL AGENCIES

TNMP's local management and operational personnel within all business units are actively engaged with local and state authorities (where applicable) regarding wildfire risk and mitigation. Engagement includes communicating with local Emergency Management personnel as well as governing bodies (such as City Councils, County Commissions, etc.) who are responsible for the implementation of response plans and various Ordinances regarding wildfire concerns. Either the business unit's Director, Field Supervisor, or Community Liaison will consult with these agencies when requested or on a periodic schedule if desired. Strategies and activities may include the following:

- Providing appropriate contact information for local personnel needed to respond during a wildfire emergency;
- Potential support resources that can be shared between agencies (i.e., equipment needs, maps of key facilities, etc.);
- Vegetation management resources;
- Clearing requirements as per local or state codes as well as changes to those requirements or codes;
- Communication strategies with external stakeholders (customers, residents, and businesses);
- Monitoring resources for active fires as well as weather conditions (i.e., Texas A&M mapping system);
- Other general concerns related to wildfire concerns and effective prevention strategies.

Federal regulations and requirements (as applicable) are also reviewed and monitored by either local or Executive Management personnel.

CORPORATE WILDFIRE RESOURCES

PNM (TNMP's sister company within PNM Resources) is located in a much higher wildfire risk environment and has therefore developed a detailed Wildfire Mitigation Plan that is administered

by the Vegetation Management department. As part of that plan, PNM has developed detailed analysis and mitigation techniques that TNMP can utilize as applicable. A blueprint to evaluate risk and respond to events and mitigation activities has been established at PNM. TNMP will use PNM's experience in its application and development of its wildfire response. Corporate knowledge exchanges can be developed across the companies rather quickly and resources can be made available to TNMP in the event of a widespread event. Executive and local management resources will consult with those resources in the event that a wildfire condition dictates.

VEGETATION MANAGEMENT

TNMP maintains an effective Vegetation Management (VM) program. It is staffed with three Foresters and a Vegetation Program Manager who oversees the work of contracted tree crews. The Vegetation Management Department is responsible for inspection, patrolling, and trimming Transmission, Distribution, and secondary voltages as described in detail below. TNMP follows industry standard trimming techniques including natural pruning to direct the growth of the tree away from power lines. TNMP follows species-dependent clearance specifications that match industry standards including three-year's worth of clearance. TNMP utilizes vegetation related outage data, patrol results, and customer requests to inform its workflow.

METRICS

Currently, the Vegetation Management Department tracks metrics on Preventive Maintenance and Reactive Maintenance miles of work completed for both Transmission and Distribution. Costs per mile are tracked and available for analysis. Additional information is collected in the GIS software program (Clearion), which is used to record vegetation management activities for tracking and audit purposes.

CONTRACTORS

PNM's Vegetation Management contractor, Trees, LLC, maintains a well-developed wildfire prevention program that includes annual training for all employees. Trees, LLC crews are equipped with firefighting tools on all of their trucks and stage their tools at each job site as a matter of practice so that they are ready to use at a moment's notice. PNM Foresters make regular field visits and monitor all work by tree crews for compliance. Job safety tailboard sessions are routinely assessed during site visits. A yet-to-be-determined RFW communication protocol will include contractors.

MONITORING OF LOCAL CONDITIONS

Both local and Executive management personnel monitor and discuss current rainfall conditions and take preventative measures or issues advisories to field personnel for awareness in some areas. For example, if no significant rainfall has been observed for over 30 days in the Gulf Coast region, an evaluation is performed as to whether or not insulators in the area should be

washed via helicopter to avoid potential flashover incidents. Employees are advised to work to prevent conditions where sparking or contact with hot equipment could potentially occur. Red Flag Day communications are distributed to management personnel in areas where applicable as advisories are distributed for local awareness. Field employees are advised to report any vegetation that could be encroaching onto energized facilities and are reminded of risks in local safety meetings.

ANNEX E

HURRICANE RESPONSE PLAN

SUMMARY

TNMP maintains a detailed Hurricane Response plan as part of its Gulf Coast Region Emergency Operations Plan. This operating area is the only area that is exposed to hurricane emergencies within the TNMP system. TNMP has executed this plan numerous times and is well-versed in its hurricane response.

Guidelines are listed throughout this Plan regarding how to evacuate prior to storm arrival and re-enter facilities post-storm once damage evaluations have been completed and it has been deemed safe to re-enter by the Executive Committee and state/local emergency management personnel. The plan also details TNMP's comprehensive company-wide response to a hurricane event, which is subject to yearly drills in accordance with established PUCT rules.

In particular, page 8 of the Hurricane Response Plan contains a detailed timeline showing when particular activities should occur once storm impacts are evaluated. Release of employees is to be discussed 72 hours prior to landfall and return of employees is to be discussed within 24 hours after landfall. Discussions and trigger points are determined by the Executive Committee once all known information is evaluated. Hurricane Evacuation Zones and Evacuation routes are detailed on pages 72 & 73.

ANNEX F

CYBER SECURITY

SUMMARY

As a subsidiary of PNM Resources, Inc., TNMP is included in the overall Corporate Cyber Security incident response planning policies and procedures which are managed and administered by PNM Resources' Corporate Security department. In particular, PNM Resources Policy 302.8 – Cyber Security Incident Response Plan is utilized by TNMP in the event of a cyber security incident requiring immediate response. The Purpose and Scope of that document reads as follows and is applicable to each of TNMP's operating areas:

PURPOSE

PNM Resources and its wholly owned subsidiaries (hereinafter referred to as "PNMR") has the following Cyber Security Incident Response Plan (CSIRP) to ensure cyber and physical security incidents associated with information systems are communicated and resolved in a timely and controlled manner to protect our company from strategic, financial, operational, or reputational impacts.

SCOPE

All employees, contractors, and service vendors who have authorized electronic or physical access to any of PNMR's assets, networks, or cyber systems (hereinafter referred to as "users") are responsible for understanding and complying with this plan. All users are responsible for protecting PNMR's networks, systems, and infrastructure against active hostile attacks and inadvertent cyber security incidents. PNMR expects all users to participate by reporting any unusual or suspicious observations as described in the Department of Homeland Security slogan "If you see something, say something". Users will report an incident to their direct supervisor, a call to the Business Technology Services (BTS) Service Desk, Corporate Security, or BTS Information Security (InfoSec). If Corporate Security or InfoSec determines an event is outside of normal operating behavior, InfoSec will inform the Crisis Management & Resilience (CMR) team. Upon confirmation of a cyber incident, the Executive Director, Technology & Chief Security Officer (CSO), or the Associate Director, Cyber Security, or their designees will determine if the Cyber Security Incident Response Team (CSIRT) will be activated to manage a coordinated response and investigate the abnormal behavior. The Executive Director, Technology & CSO, or the Associate Director, Cyber Security, or their designees will notify CMR of said incident. CMR will notify the CSIRT via the PNMR Mass Notification System. The CMR team will serve as Incident Command and the CSIRT Lead, assigned based on the nature of the incident, will oversee all incident response activities.

This plan is considered "Confidential" and is maintained at the Corporate Headquarters located in Albuquerque, NM. The Plan details the steps necessary to recognize a cyber event, report the event to the proper entities, and the response that will be initiated due to the event. TNMP employees are trained on the principles and procedures contained in this document and

are required to complete yearly training regarding cyber security incidents and how to avoid them. Additionally, simulated cyber security tests are conducted monthly and results monitored to assess further training requirements.

ANNEX G

PHYSICAL SECURITY

SUMMARY

As a subsidiary of PNM Resources, Inc., TNMP is included in the overall Corporate Physical Security Incident Response which is managed and administered by PNM Resources' Corporate Security department. In particular, the **Corporate Security Policy** is utilized by TNMP for prevention and reporting of any security incident requiring immediate response. The Purpose and Scope of that document read as follows and are applicable to all of TNMP's operating areas:

PURPOSE

The purpose of the Corporate Security program is to identify, manage, and mitigate personnel and physical security risks to a reasonable level, in accordance with the risk tolerance of the Corporation. A continually more complex and sophisticated threat environment necessitates a professional function that provides the protection and first response to physical and personnel security events. A Corporate Security program, aligned with this policy, is vital to mitigation of risks posed by threats due to heightened geopolitical tensions, terrorism, criminal activity, and trusted insiders.

To facilitate this policy, Corporate Security is accountable for working with Asset Owners to develop and deliver governance, standards, and services designed to reduce the risk of personnel and physical security incidents within the Corporation. The Corporate Security team shall collaborate with Asset Owners and business units to advise them in identifying their physical security risk and crafting strategies to reduce the likelihood of victimization in the areas of personnel security, loss prevention, and facility protection. The Business Unit is accountable for working with Corporate Security to reduce their risk to an acceptable level by implementing security controls developed jointly by the business unit and Corporate Security.

Corporate Security will work with asset owners and business units to identify risks and recommended countermeasures for the following areas:

- Personnel safety and physical security;
- A physical security environment that permits the reliable generation, transmission, and distribution of electricity;
- The safeguarding of the Company's reputation;
- The protection of property and assets.

SCOPE

Corporate Security is accountable for developing and delivering appropriate organizational governance, consult on and recommend standards, and provide services, in the protection of corporate personnel and assets for PNM Resources and its subsidiaries. Corporate Security will

work with Asset Owners to establish appropriate administrative, technical, and physical controls to protect facilities, equipment, assets, employees, contractors and customers from loss or physical risk of harm. Corporate Security is responsible for collaborating with Asset Owners and Business Units to determine facility risk and threat levels, and recommended levels of protections and mitigation measures.

Physical security policies, procedures, and jointly developed standards apply to all employees, consultants, contractors/vendors, business partners, and any other person(s) having access to any Company facilities or physical assets. Company business units may establish additional practices which are relevant to their operations or local law in consultation with Corporate Security.

When necessary and in consultation with leadership and Asset Owners, Corporate Security personnel are entrusted with responsibility to plan for, collaboratively prevent and assist with development of appropriate mitigation(s), response to, and investigation of security incidents. Corporate Security shall be responsible for physical security awareness and training programs within the Company.

TNMP PHYSICAL SECURITY INCIDENT, RESPONSE PLANNING

TNMP Corporate Security personnel will be expected to plan for executing incident response efforts as determined by the level of risk associated with a threat or incident. Risk and response are determined by the probability of the action or event and the potential or actual impact on corporate operations or assets, including facilities, equipment, and personnel.

For threats that are supported in the case of actionable intelligence obtained either from OSINT sources or from law enforcement, increasing vigilance and restricting access at corporate facilities may be determined to be the prudent course of action. This would include during:

- National emergencies;
- Natural or man-made disasters, including hazardous material releases;
- Terrorist or terroristic threat conditions or increased levels of demonstrable risk to critical corporate assets or critical infrastructure;
- Significant criminal activities;
- Civil disturbances;
- Pandemic related health emergencies;
- Other contingencies that would seriously affect the ability of corporate personnel and field personnel to perform their critical tasks, missions, or objectives.

Response and Planning should include:

- Establishing effective corporate communications during any incident or event to minimize confusion and maximize effective decision making;
- Coordination and linkage between Management and Field personnel regarding procedures for facility/site emergency response and protection;
- Coordinating as necessary or appropriate given the scope/scale of any threat or incident with local, state, and federal officials. Primary goals are to maintain open lines of

- communication and to request aid or assistance when required to maintain effective operation and control of critical infrastructure;
- Restricting access to some specific or even all corporate locations to only essential personnel;
- Positive identification of personnel and equipment authorized to enter and exit any
 construction center or other corporate location deemed threatened or at risk, as well as
 any critical infrastructure locations likewise identified;
- In some instances, it may be appropriate or necessary to pre-designate personnel, equipment, and other resources to enhance security related efforts at corporate locations and/or at critical infrastructure locations, dependent upon the nature and scope of the threat or incident.

The Facility Security Level is determined through a matrix of weighted factors as well as the demonstrable level of risk associated with a threat or incident. This provides a determinative recognition of the nature and scope of the corporate security physical incident response.

In this matrix, the likelihood or probability of the risk or incident occurring is weighed against the impact or severity that the threat or actual incident or occurrence could have or actually does have on corporate assets and/or staff.

Risk- Response levels include the following:

- Low
- Medium
- High
- Extreme

		IMPACT / SEVERITY				
gligible	Minor	Moderate	Major	Critical		
<u>LOW</u>	<u>MEDIUM</u>	<u>MEDIUM</u>	<u>HIGH</u>	<u>EXTREME</u>		
<u>LOW</u>	<u>MEDIUM</u>	<u>MEDIUM</u>	<u>HIGH</u>	<u>EXTREME</u>		
<u>LOW</u>	<u>LOW</u>	<u>MEDIUM</u>	<u>HIGH</u>	<u>HIGH</u>		
<u>LOW</u>	<u>LOW</u>	<u>LOW</u>	<u>MEDIUM</u>	<u>HIGH</u>		
<u>LOW</u>	<u>LOW</u>	<u>LOW</u>	<u>MEDIUM</u>	<u>MEDIUM</u>		
	LOW LOW LOW	LOW MEDIUM LOW MEDIUM LOW LOW LOW LOW	LOW MEDIUM MEDIUM LOW MEDIUM MEDIUM LOW LOW MEDIUM LOW LOW LOW	LOW MEDIUM MEDIUM HIGH LOW MEDIUM MEDIUM HIGH LOW LOW MEDIUM HIGH LOW LOW LOW MEDIUM		

Risk acceptance is an allowable outcome of applying this risk management process. Risk acceptance is defined as the explicit or implicit decision not to take an action that would affect all or part of a particular risk. Though made every day, the decision to accept risk is not one to be taken lightly. The threat to Corporate Facilities is very real, and the decision to accept risk could have serious consequences. For that reason, it is critical that Corporate Leadership obtain all the information they deem necessary to make a fully informed decision.

In some cases, accepting risk is unavoidable. Multiple competing requirements, standards, and priorities cannot always be reconciled. All budgets have some limitation, and political and mission requirements cannot be ignored.

To make an informed risk-based decision regarding the mitigation or the acceptance of risk as part of a risk management strategy, collaboration between Corporate Security and the Corporate Leadership is essential. For any recommended countermeasure, Corporate Security must provide all information pertinent to the decision: the nature of the threat, the specific vulnerabilities that must be addressed, a complete understanding of the potential consequences, and the costs. Corporate Leadership must be provided this information in order to make as informed a decision as possible.

PHYSICAL RESPONSE GUIDELINES

LOW (Green) Determination

- Normal security operating standards and procedures.
- General workforce security awareness.
- Security, Threat, and Disaster Recovery Plans reviewed / updated.

MEDIUM (Yellow) Determination

- Ensure all gates, security doors, and security monitors are in working order and visitor, contractor, and employee access control is strictly enforced.
- Identify critical essential and on-call personnel.
- Establish communications with law enforcement agencies and emergency/crisis management organizations.
- Work force alert to unusual activities and whom to report such activities.
- Operational plans and procedures up-to-date, including:
 - Security, Threat, Disaster Recovery, and Fail-Over plans.
 - Determine availability of additional security personnel.
 - Determine responsiveness of medical emergency personnel.
- Review all data and voice communications channels to assure operability, user familiarity, and backups function as designed.
- Identify additional business/site specific measures as appropriate.

HIGH (Orange) Determination

- · Implement measures for Low and Medium.
- Place all critical and on-call personnel on alert.
- Ensure all gates and security doors are locked and actively monitoredeither electronically or by guard patrols.
- Implement enhanced screening procedures for personnel and deliveries.
- Limit access to facilities to essential personnel.

- Increase liaison with law enforcement and emergency/crisis management services.
- Coordinate critical security programs with adjacent utility organizations when and where appropriate.
- Consider emergency utility operations/procedures appropriate to available threat intelligence.
- Media releases should be reviewed by Corporate Communications prior to release.
- Additional business/site specific measures as appropriate.

EXTREME (Red) Determination

- Implement measures for Low, Medium, and High.
- Restrict or cease all vendor or visitor access that is not deemed essential.
- Establish contacts with appropriate emergency/crisis management agencies.
- Secure all entrances and critical service facilities, such as substations, and consider use of armed security personnel at critical locations or facilities.
- Stop all mail and package deliveries directly to site.
- Consider inspections for all vehicles entering site.
- Fully brief all personnel on emergency procedures.
- Establish or maintain frequent communications with all law enforcement agencies.
- Review plan for returning to reduced threat level status, prepare for recovery actions, and coordination as appropriate.
- Additional business/site specific measures as appropriate.

PHYSICAL ACCESS CONTROL, MONITORING AND RESPONES

Physical Access Control Systems (PACS) associated with Security Perimeters at various locations provide a means of both protecting and monitoring locations, including offices, construction, and service centers as well as critical infrastructure.

PACS control panels at all locations that are so equipped are locked and secured and further protected by a tamper alarm. If the tamper switch on any panel containment box is triggered, an alert message (event) is issued on the Security Operations Center operator workstation and must be investigated.

If an attempt to gain entry to any location equipped with a PACS is made with an invalid access card, an alert message (event) will appear on the security operator's workstation and will require further investigation. Normal use of these areas will result in doors being opened by an individual, then closing on a normal, automatic cycle. However, if a door remains open for an extended period, a "Held" alarm will occur on the access monitoring workstation. Once the door closes the alarm will clear and the system will reset. Generally, all doors alarm after being open longer than 30 seconds.

Under normal circumstances, a door should never be held open (without prior notification and/or monitoring by Security). Should a hold open be required, there is a process to acquire a Monitoring Exception. Held open alarms will be investigated by security if the alarm does not clear with the door being closed shortly after the alarm. Prior notification and investigation findings will be logged in the PACS as a journal entry.

Additionally, if a door at any location with a PACS is forced open in any manner other than being opened with an authorized access card, it likewise will trigger an alert message, which is an event that must be further investigated.

All events will be investigated, and a security incident report will be completed if the investigation reveals an attempt at unauthorized physical access to any Physical Access Control system. If the investigation reveals a malicious or suspicious attempt or actual unauthorized entrance at any location, Corporate Security will immediately work with both internal and external stakeholders and partners:

- To affect a response,
- Engage in mitigation, and/or intervention where applicable, prudent, and appropriate.
- Seek to achieve stabilization and documentation as applicable and appropriate, and to then move to.
- Recovery mode, to enable a return to a status of normal operations without undue delay.

At locations that are equipped with camera systems, during any event or investigation, the SOC operators will immediately use the camera system, where available to observe the area of the incident or alarm. A security officer may be dispatched to the source of the alarm to investigate or in the case where security is not present, contact will be made with the appropriate law enforcement agency to effectuate a response.

When and where applicable, SOC Operators can utilize camera views to provide information to responding law enforcement and to update the corporate chain-of-command of the ongoing incident, until it reaches a point of conclusion.

This plan is considered "Confidential" and is maintained at the Corporate Headquarters located in Albuquerque, NM. The plan details the roles and responsibilities between Corporate Security personnel, Management at TNMP, asset owners within TNMP that operate and control the necessary infrastructure for TNMP to effectively perform its business, and the expectations of employees/contractors/vendors and business partners to provide a safe working environment. TNMP has operated in a safe, secure environment, and will use this plan and the oversight of Corporate Security personnel located at TNMP in continuing to provide a safe workplace.