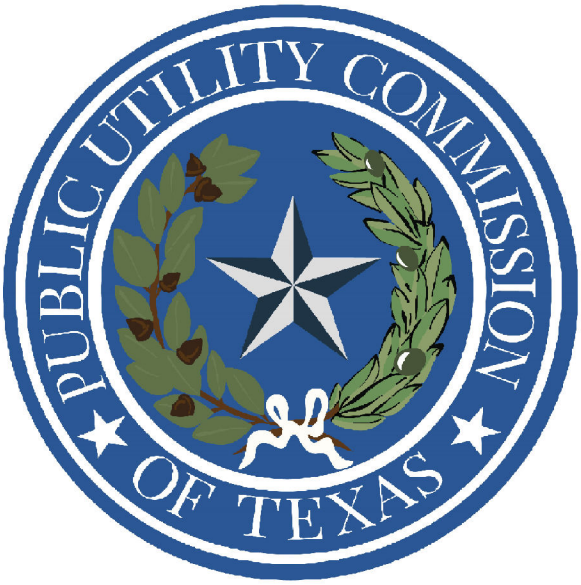

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Purpose

As the number of individuals being tested and diagnosed with COVID-19 continues to increase, the likelihood that an employee will report a confirmed diagnosis also increases. As managers and supervisors at BE Companies, it is important that you understand the steps that need to be taken in order to respond appropriately to an employee's diagnosis.

BE Companies also recognizes that supervisors are most likely persons to receive reports of an employee's COVID-19 diagnosis or potential infection. An informed and trained supervisory staff can greatly assist with BE's response to COVID-19 case. Managers and supervisors are instructed to report any disclosed diagnosis or potential infection immediately to Human Resources (or the BE's designated contact) and are instructed to maintain the confidentiality of any such report so as to avoid any potential violation of the Americans with Disabilities Act (ADA) or the Health Insurance Portability and Accountability Act (HIPAA).

Scope

This SOP (*Standard Operating Procedures*) applies to all managers and supervisors working on behalf of BE Companies.

Responsibilities

All Managers and Supervisors are responsible for understanding the proper handling of employee personal information and understanding the proper steps needed to facilitate the handling of a positive COVID-19 report.

Procedure

Manager/Supervisor

1. Employee makes notification (hopefully by phone) to the employee's supervisor of either showing symptoms of COVID-19 or that they have a confirmed positive test result.
2. Obtain information by asking the employee the following questions and advise the employee to stay at home to wait for further instructions provided by Human Resources:
    a. When did the symptoms first began?
    b. What symptoms are they exhibiting?
    c. If or when they were tested?
    d. Who do they recall having contact with at BE during the last 10 days?
    e. What work locations or clients have the employee been in contact with?
3. Notify Human Resources and Health & Safety departments with the information obtained from the employee.

Human Resources / Health & Safety

1. Human Resources (or the designated contact), acting on behalf of BE, should contact the employee immediately and verify the diagnosis. Advise the employee that his/her self-disclosure is appreciated, that he/she will not be discriminated or retaliated against because of the diagnosis and that, while information about the diagnosis may be shared with others, the employee will not be identified by name.
2. Instruct the employee to stay home for at least 10 days or any such longer period recommended by his/her health care provider or the CDC.
3. Advise the employee that they will need to provide documentation from a medical provider to be eligible for paid sick time. The 10-day quarantine period will begin on the day the test was taken and sick time will begin on the day of quarantine.
4. Advise the employee that they are allowed sick time mandated by FMLA. These hours will not be counted as hours worked and will not be factored into any possible overtime.
5. Once Human Resources (or the designated contact) has obtained the documentation of test results, they will follow up with employee's supervisor and notify payroll of sick time to be provided to employee. Advise employee they are to contact Human Resources department for approval on return to work.
6. Contact the employees that were in contact with the infected employee, recommend they take isolation measures, get tested if they are exhibiting symptoms and to contact the Human Resources Department if they, at any time, exhibit symptoms of COVID-19 while in isolation.

Client Mandated Testing

As a Client based company, BE is mandated under contractual obligations to abide by the COVID-19 testing requirements to perform work on client properties. Should BE be required to participate in the COVID-19 testing being performed by clients, ALL BE personnel working on site will be required to participate. Any employee who chooses not to be tested will be sent home until they are deemed safe to return to work by either time quarantined or by medical physician.

References

Centers of Disease Control and Prevention
Americans with Disabilities Act
U.S. Department of Health & Human Services

Definitions

Isolation separates sick people with a contagious disease from people who are not sick.

Quarantine separates and restricts the movement of people who were exposed to a contagious disease to see if they become sick.

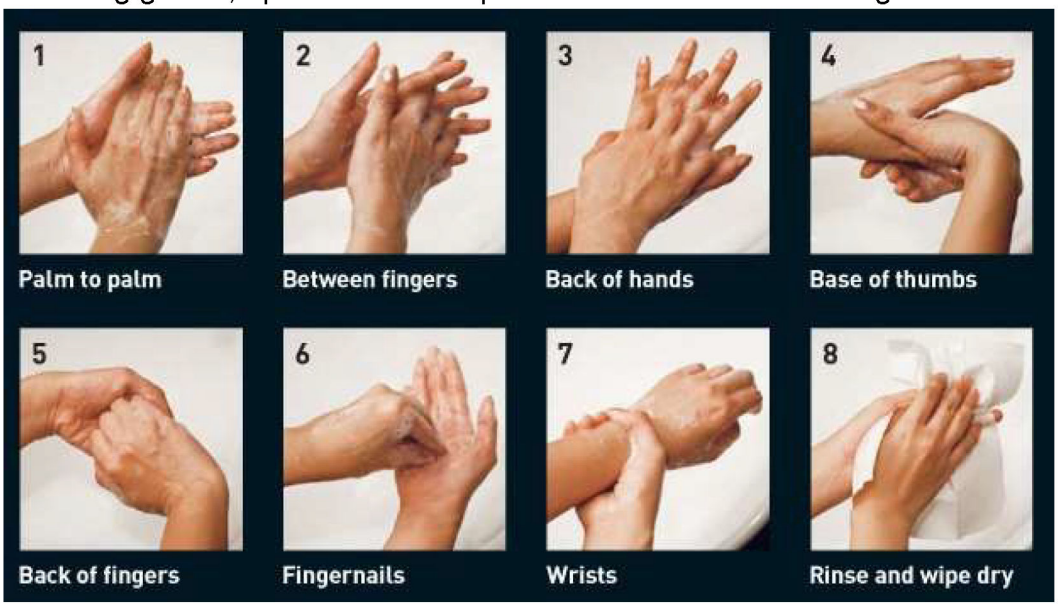
HIPPA: Health Insurance Portability and Accountability Act of 1996

ADA: Americans with Disabilities Act

Appendix A

Cleaning and Disinfecting Protocol

1) Clean an area using the CDC-EPA recommended disinfectant products after someone with confirmed or suspected coronavirus(COVID-19) has left a field office, vehicle, or other enclosed location. Disinfecting the area, will reduce the risk of passing the infection on to other people https://www.epa.gov/pesticide-registration/list-n-disinfectants-coronavirus-covid-19
2) Precautions
   - If an enclosed area can be kept closed and secure for 24 hours, wait until this time has passed for cleaning as theamount of virus living on surfaces will have reduced significantly by 24 hours
   - Wear glasses, disposable gloves and if possible, aprons for cleaning. Manage disposable PPE according to waste guidelines below.
   - if an area has been heavily contaminated, such as with visible bodily fluids, from a person with coronavirus (COVID-19), consider using protection for the eyes, mouth, and nose, as well as wearing gloves and an apron.
   - wash hands regularly with soap and water for 20 seconds, and after removing gloves, aprons and otherprotection used while cleaning.



3) Cleaning Materials
   - Use disposable cloths or paper roll and disposable mop heads, to clean all hard surfaces, floors, chairs, door handles and sanitary fittings, following one of the options below:
   - use a combined detergent disinfectant solution at a dilution of 1,000

parts per million availablechlorines.
- a household detergent followed by disinfection (1000 ppm av.cl.). Follow manufacturer's instructions fordilution, application and contact times for all detergents and disinfectants; or

4) Cleaning Methods
   - Using a disposable cloth, first clean hard surfaces with warm soapy water. Then disinfect these surfaces with the cleaning products you normally use. Pay particular attention to frequently touched areas and surfaces, such as bathrooms, grab-rails in corridors and stairwells and door handles
   - Public areas where a symptomatic individual has passed through and spent minimal time, such as corridors, but which are not visibly contaminated with body fluids can be cleaned thoroughly as normal.
   - All surfaces that the symptomatic person has come into contact with must be cleaned and disinfected, including:
   - objects which are visibly contaminated with body fluids
   - all potentially contaminated high-contact areas such as bathrooms, door handles, telephones, grab-railsin corridors and stairwells
   - Allow cleaning materials to sit on surface before wiping as per manufactures instructions rather thanimmediately wiping surface.
   - Avoid creating splashes and spray when cleaning.
   - If possible, keep an area closed off and secure for 24 hours. After this time the amount of viruscontamination will have decreased substantially, and you can clean as normal with your usual products.
   - If cleaning involves vacuuming, then vacuum should be fitted with HEPA filter.

5) Laundry
   - Wash items in accordance with the manufacturer's instructions. Use the warmest water setting and dry items completely. Dirty laundry that has been in contact with an unwell person can be washed with otherpeople's items.
   - Clean and disinfect anything used for transporting laundry with your usual products, in line with the cleaning guidance above.

6) Waste from possible cases and cleaning of areas where possible cases have been (including disposable cloths and tissues):

   - Any cloths and mop heads, or heavily soiled items must be disposed of and should be put into waste bags as outlined below
   - Should be put in a plastic bag and tied when full.
   - The plastic bag should then be placed in a second bin bag and tied.
   - It should be put in a suitable and secure place and marked for storage until the individual's test resultsare known.
   - if the individual tests negative, this can be put in with the normal waste
   - if the individual tests positive, then store it for at least 24 hours and put in with the normal waste

For additional information please refer to the attached CDC & OSHA cleaning & disinfecting guidance.
https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/disinfecting-your-home.html

https://www.osha.gov/sites/default/files/CDC's_Cleaning_and_Disinfecting_Guidance.pdf

APPENDIX 8: THREATS TO THE FACILITY

In the event that the site receives threatening correspondence either by phone or by other means of communications, the following actions should be performed immediately:

Actions by the person receiving the threat:

1. Gather as much information as possible from the person making the threat. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted. If the threat is being made verbally (phone, or other), communicate and obtain information from the individual making the threat for as long as possible.
2. Inform the Facility Lead Technician/Lead Technician and/or Field Ops Director of the situation.

The Facility Lead Technician/Lead Technician and/or Field Ops Director may consider any or all of the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

1. Order an evacuation of the facility.
2. Call 911 for Police or Fire Assistance.
3. Arrange for additional security personnel for the facility.
4. Direct plant personnel to commence a controlled shutdown of the facility.
5. Direct searches to be performed on vehicles entering the facility.

APPENDIX 4: EVACUATION PROCEDURES

Immediate Site Evacuation Procedure

1. Personnel present on-site at the O&M Building shall immediately take the following actions:
    a) Locate and obtain the visitor/contractor sign-in sheet.
    b) Locate and obtain all immediately accessible hand-held radios.
    c) Gather at the front entrance gate at facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Appendix 3).

        *NOTE: The primary muster area must be a predetermined location, with any alternate muster areas selected only when egress routes to the primary muster area are unsafe to proceed along.

    d) Pass the following information over the plant radio system:

1) The muster area the employees will be proceeding to.

2) Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).

e) Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area. Personnel on-site should not delay in evacuating or wait on other personnel that they anticipate may arrive.

f) Upon arriving at the designated muster area, the group shall designate a Person- in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.

g) After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for. The Person-in-Charge will then query by radio for personnel who are unaccounted for. The Person-in-Charge shall then establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel who are not accounted for.

h) All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location. The "ALL CLEAR" signal will be communicated by radio or cellular telephone.

i) The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.

2. Personnel present in the field/substation area (other than the O&M Building)

shall immediately perform the following actions:

a) If not monitoring the plant radio system, immediately turn on hand-held radios.

b) Proceed to the designated muster area, unless the egress route to the muster area is not safe for travel. In such a case, proceed to an alternate muster area.

c) Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated muster area.

d) Upon reaching the appropriate muster area, report to the Person-in-Charge and continue to monitor the plant radio system. If no other personnel are present at the muster area upon arrival, communicate to the Site/Facility Lead Technician that no other personnel are present in the area.

3. Personnel not in the operating areas of the plant (to include the O&M building and parking areas) shall immediately perform the following actions:

a) Locate and obtain all immediately accessible hand-held radios.

b) Proceed to the designated muster area.

c) A Person-in-Charge shall be designated for the muster area. In many cases, this will be the Emergency Coordinator. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

d) If the Emergency Coordinator is not present at the muster area, the Person-in- Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives. In the event that the Emergency Coordinator is in plant operating areas or has proceeded to the alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency

Delayed Site Evacuation Procedures

1. Personnel present on-site at the O&M building shall immediately take the following actions:

    a) Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.

    b) Locate and obtain the visitor/contractor sign-in sheet

    c) Communicate names of visitors/contractors currently in the operating areas to outside operating personnel. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.

    d) When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the O&M building, the Facility Lead Technician (or Emergency Coordinator, as appropriate) shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route.

    e) Notify the Emergency Coordinator of the current facility status, and evacuation details.

    f) Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.

    g) Once the shutdown has been completed, all essential personnel shall gather in the O&M and take roll call. When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel. In such a case, proceed to the alternate muster area.

2. Personnel present in the field/substation area (other than the O&M building) shall immediately perform the following actions:

    a) Continuously monitor the radio system for information and instructions.

    b) Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.

    c) Locate and direct non-essential personnel to proceed to the O&M building immediately.

    d) Perform facility shutdown instructions as directed by the Facility Lead Technician/Lead technician.

    e) Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the muster point for instructions.

3. Personnel not in the operating areas of the facility (to include the O&M building and parking areas) shall immediately perform the following actions:

a) Locate and obtain all immediately accessible hand-held radios. (b) Proceed to the designated muster area (see Site Map).

b) A Person-in-Charge shall be designated for the muster area. The Person-in- Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

c) The Person-in-Charge at the designated muster area will coordinate outside responding agency activities and provide assistance (to include personnel, resources, and administrative functions) to the O&M building as directed by the Emergency Coordinator and/or Facility Lead Technician/Lead technician.

4. The Emergency Coordinator shall immediately perform the following actions:

   a) Proceed to the O&M building or to the location on the facility most appropriate for directing response actions for the emergency.

   b) Coordinate actions related to the emergency and provide directions to muster area.

5. Persons-in-Charge

   a) In the event that the emergency escalates in severity or immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

- The Designated Muster Area is the primary gathering point for personnel and should be used during evacuations unless the emergency has rendered egress routes to the Muster Area unsafe for travel.
- The Alternate Muster Area is the alternate gathering point for such circumstances.
- Alternate muster location will be communicated at the time of evacuation and will take into consideration the event occurring that is causing the evacuation

Designated Muster Area	O&M Building
Alternate Muster Area	Alternate muster location will be determined at the time of the event.

CIP-003

Physical Security Controls Plan

1. Objective
    i. This document provides the CIP Cyber Security Physical Security Controls Plan for Elawan Energy's low impact BES Cyber Systems. This procedure is used as a part of the compliance requirements outlined in NERC Reliability Standard CIP-003.
2. Applicable Systems
    i. The purpose of this plan is to detail the physical security controls implemented to enhance the security of the BES Cyber Systems based on Elawan Energy Applicable Systems.
3. Terms and Definitions - Terms defined in the NERC Glossary of Terms are capitalized and used as defined there. The additional terms listed in this section are specific to this document.
    i. Access Device- Any card, key, code, or other means that can be used alone or in conjunction with another Access Device to obtain entry.
    ii. Applicable Systems- BES Cyber Systems identified in the annual assessment required by CIP-002 and all cyber equipment identified in the Elawan Energy Electronic Access Controls Plan Required by CIP-003.
    iii. Escorted Access- Access granted into a secured area to an individual, that does require accompaniment by an authorized person.
    iv. Exceptional Situations- A situation that involves or threatens to involve one or more of the following, or similar, conditions that impact the safety of BES reliability.
        a) A risk of injury or death;
        b) Civil unrest;
        c) An imminent or existing hardware, software, or equipment failure;
        d) Unplanned or unauthorized destruction or damage to a security control;
        e) A security incident requiring emergency assistance;
        f) A response by emergency services; the enactment of a mutual assistance agreement;
        g) An impediment of large-scale workforce availability.
    v. Locking Device- A mechanism designed for keeping a barrier (e.g., door, lid, gate, combination lock) in a secured state operated only by an Access Device.
    vi. Unescorted Access- Access granted into a secured area to an individual without an accompaniment.
    vii. Visitor- Personnel without Unescorted Access granted by CIP Senior Manager or designee.

Acronyms

Acronym	Term
BES	Bulk Electric System
CIP	Critical Infrastructure Protection
CIP SI	CIP Sensitive Information
NERC	North American Electric Reliability Corporation

4. Procedure
    i. Assessment of Need for Physical Security Controls. Elawan Energy is a renewable generation entity. Elawan Energy has implemented physical security controls based on the need to protect facilities from damage and loss. The function of this physical security control plan is to control access and reduce or mitigate the risk of unauthorized individuals entering the site and for the protection of personnel and equipment
    ii. Identified Needs:
        a) Protect entire Facility against loss due to theft.
        b) Protect entire Facility against physical vandalism.

c) Protect the generation controls against unauthorized physical access.
d) Protect the Protection System components against unauthorized physical access.

iii. Defense In-Depth
a) Elawan Energy has a defense in-depth approach, which consists of the physical security controls at the following layers:
b) Perimeter fence
c) Structures:
1. Operations and Maintenance (O&M) Buildings
2. Substation Control Houses
3. Solar Generation Structures

iv. Adequacy of Physical Security Controls
a) Elawan Energy has determined, based on the assessment of need for asset protection, that a defense-in-depth approach to physical security controls is appropriate for protection of Applicable Systems and individual resource's protection and control systems.

5. Physical Security Controls
i. Perimeter Controls
a) The perimeter fence which surrounds the O&M building and substation control house shall serve as a physical security control but not the primary physical security control.
b) The security gate, secured by a Locking Device, which grants access to the O&M building parking lock shall serve as a physical security control but not the primary physical security control.
c) The secured room inside of the O&M building and the substation control house, housing Applicable Systems shall serve as the primary physical security control.
d) Solar Generation structures shall serve as the primary physical security control for the individual resource's protection and control systems.

ii. Entryways
a) Entryways to locations housing Applicable systems and individual resource protection and control systems shall be equipped with a hardened door secured by a Locking Device controlled by an Access Device.

iii. Physical Access Control System Condition
a) In the absence of operational personnel with Unescorted Access permissions, entryways to locations housing Applicable Systems and individual resource's protection and control systems, including perimeter fences, shall be in a closed and locked state.

6. Physical Access Management
i. Unescorted Access
a) Individual need for Unescorted Access privileges to locations housing Applicable Systems and individual resource protection and control systems shall be determined by the CIP Senior Manager or designee.
b) Upon granting Unescorted Access the CIP Senior Manager or designee shall:
1. Distribute Access Devices to locations housing Applicable Systems and individual resource protection and control systems as needed and,
2. Document the approval for Unescorted Access via [Authorized Access Log Attachment B]

ii. Visitor Access

a) Visitor(s) access to locations housing Applicable Systems and individual resource protection and control systems shall be based on the need determined by Elawan Energy employees assigned to Elawan Energy.
b) Visitor(s) granted Escorted Access shall be Escorted by a designated Elawan Energy employee assigned to Elawan Energy with Unescorted Access (Escort).
c) Escort shall complete the [Visitors Log Attachment A] prior to entering locations housing Applicable Systems.

7. Exceptional Situations
   i. Exceptional Situations will be handled in accordance with the process contained in the CIP Exceptional Circumstances and Exceptional Situations section of the CIP Master Policy.
8. Access Device Management - Elawan Energy utilizes multiple Access Devices and processes for accessing structures housing Applicable Systems and their associated protection and control equipment.
   i. The CIP Senior Manager or designee shall:
      a) Ensure all non-issued Access Devices are stored in a secured location.
      b) Issue Access Devices to personnel approved for Unescorted Access, as needed.
      c) Ensure workstations with access management software installed are in a secured location.
      d) Update Access Devices used to unlock Locking Devices, as needed.
      e) Revoke, remove or change Access Device privileges as appropriate (i.e. changes in job function, lost or damaged Access Devices, compromised proximity card, etc.), and
      f) Document issuances/changes to status of Access Devices owed by Elawan Energy. within the [Authorized Access Log Attachment B].
9. Document Retention:
   i. Documentation related to physical security controls including, Access Device Logs shall be maintained for a period of three calendar years unless otherwise specified.

Attachment A: Visitor Access Log To be completed by personnel with approved Unescorted Access.

VISITOR ACCESS LOG						
Site Manager:				Phone:		
Visitor Name	Company	Escort	Date	Time In	Time Out	Phone Number

Attachment B: Authorized Access Log

Log shall be completed once access credentials are issued to an individual that has been granted Unescorted Access.

AUTHORIZED ACCESS LOG							
Site Manager:				Phone:			
Access Granted To	Date Granted	Granted By	Access Device Issued Y/N	Issued By	Date Access Removed	Access Devices Returned Y/N	Comments

Document Control:

Name	Title	Date
Rogelio Hernandez	Construction & Technical Director	04/10/2022

Version	Approval Date	Effective Date	Revision Summary
1.0	04/10/2022	04/15/2022	Initial Physical Security Plan

Elawan Energy

Cyber Security Incident Response Plan

1. Objective This Cyber Security Incident Response Plan (CSIRP) covers the response to all potential or actual Cyber Security Incidents that effect Elawan Energy's BES Cyber Systems. This plan is used as a part of the compliance requirements outlined in NERC Reliability Standard CIP-003.
2. Purpose The CSIRP will contain the following:
    a. Identification, classification, and response to Cyber Security Incidents;
    b. Determination of whether an identified Cyber Security Incident is a Reportable Cyber Security Incident and subsequent notification to the Electricity Information Sharing and Analysis Center (E-ISAC), unless prohibited by law;
    c. Identification of the roles and responsibilities for Cyber Security Incident response by groups or individuals;
    d. Incident handling for Cyber Security Incidents;
    e. Testing the Cyber Security Incident response plan(s) at least once every 36 calendar months by: (1) responding to an actual Reportable Cyber Security Incident; (2) using a drill or tabletop exercise of a Reportable Cyber Security Incident; or (3) using an operational exercise of a Reportable Cyber Security Incident; and
    f. Updating the Cyber Security Incident response plan(s), if needed, within 180 calendar days after completion of a Cyber Security Incident response plan(s) test or actual Reportable Cyber Security Incident.
3. Terms and Definitions Terms defined in the NERC Glossary of Terms1 are capitalized and used as defined there. The additional terms listed in this section are specific to this document.
4. Acronyms

Acronym	Term
BES	Bulk Electric System
CSIRP	Cyber Security Incident Response Plan
CSIRM	Cyber Security Incident Response Manager
CSIRT	Cyber Security Incident Response Team
DOE	Department of Energy
E-ISAC	Electricity Information Sharing and Analysis Center
IDS	Intrusion Detection System
NERC	North American Electric Reliability Corporation

5. Roles and Responsibilities
    a. Unless otherwise delegated in delegation document, the CIP Senior Manager will be the Cyber Security Incident Response Manager (CSIRM). A delegation by the CIP Senior Manager allows both the CIP Senior Manager and delegate(s) to be a Cyber Security Incident Response Manager.
    b. The Cyber Security Incident Response Team (CSIRT) is a team made up of individuals who have the appropriate education, experience, or other expertise necessary in to assist the CSIRM in determining the classification and response for the specific Cyber Security Incident. These individuals may include, but are not limited to, technical SME's, safety or security personnel, outside vendors, personnel and compliance staff. The members of the CSIRT will be determined by the CSIRM, as needed, for each potential or actual Cyber Security Incident.

Table 2 List of Roles and Responsibilities

ROLE	INDIVIDUAL OR GROUP	RESPONSIBILITY
Cyber Security Incident Response Manager (CSIRM)	CIP Senior Manager	Provides overall direction to the CSIRT. Establishing communications with outside agencies including NERC, DOE and E-ISAC. Providing information to other senior management during an incident.
Technical SME	ROC Manager	Provides for SCADA support and troubleshooting on all interfaces with the SCADA system Serves as potential backup to the CSIRM. Provides for support and troubleshooting on all cyber systems. Serves as potential backup to the CSIRM.
Physical Security SME	Site Manager	Provides for support for all actions regarding physical security. Serves as potential backup to the CSIRM.

c. Additional individuals may be called upon for to provide technical expertise. These individuals may perform an advisory role but have no responsibility for responding to the Cyber Security Incident.

Table 3 Additional Resources

AREA OF EXPERTISE	ORGANIZATION
SCADA Network	General Electric
Firewall Support	Checkpoint / Neighbourhood IT
Physical Security	Local Law Enforcement
Regulatory Guidance	Electric Power Engineers, LLC

6. Cyber Security Incident Procedure
   a. Identification: Potential Cyber Security Incidences may be identified by, but are not limited to the following:

      i. The announcement of an exploit from a vendor, E-ISAC, or other source.
      ii. Suspicious request for information related to cyber systems. The information requested may be regarding, but is not limited to, logon credentials, system configuration, system maintenance, make and model of equipment.
      iii. Physical damage or modification to cyber equipment or systems. In addition to equipment or equipment enclosures which are physically damaged or altered the

unexpected addition or removal of devices or cabling should be considered a potential cyber security incident.

iv. Observation of abnormal system or component behavior. Abnormal behavior may include, but is not limited to:
    1. Unusually heavy or light network traffic
    2. Out of disk space or significantly reduced free disk space
    3. Unusually high CPU usage
    4. Creation of new user accounts
    5. Attempted or actual use of administrator-level accounts
    6. Locked-out accounts
    7. Cleared log files
    8. Full log files with an unusually large number of Incidents4
    9. Disabled antivirus software and other security controls
    10. Unexpected patch changes
    11. Unexpected system shutdown

v. Automated detection.
    1. The Cyber Security Incident may be detected using systems or applications such as but not limited to IDS, antivirus programs and/or network monitors.

vi. Other suspicious activity or situation that may indicate a threat or attack. Possible indicators or examples of this type of activity are: drones, suspected observation or surveillance, suspicious packages or containers.

b. Response
    i. When an employee or staff member sees or believes that a Cyber Security Incident has occurred, they will inform the CSIRM of the situation. The CSIRM shall make an initial determination on the potential classification associated with the suspected Cyber Security Incident. Based on the initial potential classification, if necessary, the CSIRM shall assemble those members of the CSIRT deemed appropriate by the CSIRM.

c. Classification: The classification of the Cyber Security Incident is done according to the Incident Types table located in Appendix A.

d. Reporting
    i. Using the information listed in Appendix A, the CSIRT will document the incident and shall notify the identified contacts of the type of incident in accordance with the reporting and timing requirements established by the appropriate entities to be contacted. Reports to E-ISAC must be made within one hour of the determination that the incident is reportable and shall be done by emailing the E-ISAC Report Form located in Attachment 1 or using the DOE OE-417 reporting portal. Initial reports to the E-ISAC may be only a preliminary notice. The U. S. Department of Energy requires one-hour reporting of all physical and cyber events that cause interruption of electric system operations. Reporting within six-hours is required for physical attacks or cyber events that could potentially impact electric power system adequacy or reliability and vandalism which targets components of any security systems. This reporting is done using Form OE-417. This can be filed electronically filed at https://www.oe.netl.doe.gov/OE417/.

e. Incident Handling: The handling of the Cyber Security Incident shall be done as detailed in the Incident Types table located in Appendix A. Specific handling actions will be determined at the time of the incident and may not include all or be limited to those actions specified in Appendix A.

7. CSIRP Testing

a. This Cyber Security Incident Response Plan will be tested and updated according to the table below. Updates need only be done when it is determined that changes need to be made.

Table 4 CSIRP Testing Interval

BES CYBER SYSTEM RATING	CSIRP TEST INTERVAL
High or Medium	15 months
Low	36 months

b. This test is to be one of the following:
   i. Actual Reportable Cyber Security Incident, or
   ii. Tabletop exercise of a Reportable Cyber Security Incident, or
   iii. An operational exercise of a Reportable Cyber Security Incident
c. A table top exercise may cause the activation of a CSIRT in order to respond appropriately to a "mock" cyber incident.
d. An operational exercise may be part of a larger test including other agencies. This test may be hosted by Elawan Energy or an outside agency. The NERC GridEx exercise is an example of an exercise hosted by an outside agency.
e. Documentation of Testing
   i. . A summary of the test shall be documented using the CSIRP Incident and Testing Form included in Attachment 2. All deviations from this CSIRP must be included in this testing documentation form
f. Lessons Learned
   i. All lessons learned, *or a statement that no lessons were learned*, must be included in the testing documentation form within 90 days of the test or incident.

8. CSIRP Updates
   a. Update this CSIRP if it is determined at any time that updates are needed. Updates identified as part of an actual incident or a test must be completed within the CSIRP Update listed in the CSIRP Update Interval table below.

Table 5 CSIRP Update Interval

BES CYBER SYSTEM IMPACT RATING - UPDATE CAUSE	CSIRP UPDATE
High or Medium – updates identified in Lessons Learned	90 Days
High or Medium – updates because of changes in roles and responsibilities or technology that would impact this document	60 Days
Low – all updates	180 Days

9. Notification of Updates
   a. The authorization of this document is considered notification of that authorizing individual of updates to this document. In cases where the authorizing individual is not the CIP Senior Manager, the CIP Senior Manager will be notified of any updates to this document. All individuals delegated by the CIP Senior Manager to perform the specific action or role of CSIRM and all individuals or groups, if any, with assigned roles and responsibilities, will also be notified of updates to this document. These notifications will be done within ninety days for updates made as a result of lessons learned. All other notifications will be made within sixty days of the authorization of this updated document.

10. Document Retention
    a. All documents related to the implementation, testing or performance of this CSIRP shall be retained for a minimum of three years. Documentation of non-compliance with a CIP standard must be retained the longer of three years or until the time when mitigation is complete.

CLASSIFICATION	DESCRIPTION	HANDLING	CONTACTS
Denail of Service (DoS)	A cyber-attack that prevents or impairs the authorized use of networks, systems, or applications by exhausting resources.	• Review cyber access logs • Correct the vulnerability or weakness that is being exploited • Request the ISP implement filtering • Implement filtering based on the characteristics of the attack • Relocate the target	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Malicious Code	A virus, worm, Trojan horse, or other code-based malicious entity that infects a host	• Review cyber access logs • Identify and isolate infected hosts • Send unknown malicious code to antivirus vendors • Configure email servers and clients to block offending emails • Block identified hosts • Shut down email servers • Isolate networks from the Internet • Disable services • Disable connectivity	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Unauthorized Access	Electronic – gaining remote access to a network or device through a port, or other means Physical – gaining local access to a network or device through a port, or other means	• Review cyber access logs • Isolate the affected systems • Disable the affected service • Eliminate the attacker's route into the environment • Disable user accounts that may have been used in the attack • Enhance physical security measures including strong password authentications • Review new or modified network accounts • Securing and establishing a chain of custody for unauthorized materials.	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts

Port Scan/Hacking Attempt	Scanning host(s) for vulnerabilities or attempts to gain access or exploit vulnerabilities	• Review security logs • Identify source of scan/hacking • Review firewall rules and network security settings • Adjust security settings to prevent future scans where possible	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Sabotage	Malicious damage of a system	• Review security logs • Identify methods employed and individuals involved • Implement recovery plan where appropriate. • Report to E-ISAC, NERC and DOE where appropriate • Review and implement potential methods for preventing future sabotage events • Securing and establishing a chain of custody for unauthorized materials	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Inappropriate Usage	User (employee or vendor) violates security policies and procedures	• CSIRM shall notify the Human Resources as appropriate • CSIRT Technical SME shall also investigate the incident and determine the severity of the inappropriate usage	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Information Theft or Loss	Theft or loss of information that would assist in the electronic access to BES Cyber Systems	• Where possible, change system to make the impacted information inaccurate • Review protection measures for impacted information	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts

Unauthorized Data Modification	Data modified in a way that adversely impacts a BES Cyber System or BES Asset	• When possible, copy modified information for future analysis • Restore impacted data to the appropriate values	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Other - Malicious	Any type of event that does not meet the descriptions above, but is malicious or is suspected as malicious	• CSIRM will instruct the CSIRT members on appropriate actions to take based on the nature of the event.	All identified attempts: E-ISAC All attempts that result in impact to the capabilities of one or more BES Assets: Transmission Operator RRO RC Internal contacts
Other - Suspicious	Any type of event that does not meet the descriptions above may be an indicator of an event in the future.	• CSIRM will instruct the CSIRT members on appropriate actions to take based on the nature of the event.	All identified events: Internal contacts As determined by the CSIRM: Law enforcement

CONTACT INFORMATION	
E-ISAC	• OE-417 reporting portal, https://www.oe.netl.doe.gov/OE417/ • operations@esisac.com • P: (202) 790-6000
Transmission Operator (TOP)	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Regional Reliability Organization (RRO)	Texas Reliability Entity Phone: (512) 583-4900 Email: information@texasre.org
Reliability Coordinator (RC)	Electric Reliability Council of Texas Phone: (512) 248-6800
Law Enforcement	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

Document Control:

Name	Title	Date
Rogelio Hernandez	Construction & Technical Director	04/10/2022

Version	Approval Date	Effective Date	Revision Summary
1.0	04/10/2022	04/15/2022	Initial Physical Security Plan

Attachment 1: E-ISAC Report Form

Send the completed form to: E-ISAC at operations@eisac.com. E-ISAC telephone number is:404-446-9780, option 2.

1. *Submitter Information*

*Reporting Entity's Name:*_____

Contact: Specify Name, Duty Position, Phone, and Email:

Name	
Duty/Position	
Phone	
Email	

2. *Incident Information*

*Affected Entity Name:*_____

Date and Time of Incident:

Month	Day	Year	Time (hh:mm)	Time Zone

Date and Time of Restoration:

	Month	Day	Year	Time (hh:mm)	Time Zone
Estimated					
Actual					

☐ Not Applicable

Incident Location:

NERC Region	
Balancing Authority	
City, State	

CSIRT Team Members Notified

Law Enforcement Involvement:

☐ Yes

Please check all that apply:

☐ Local

☐ FBI

☐ Other_____

☐ No

3. Incident Description

Type of Incident:

☐ Emergency Action (e.g., public appeal, voltage reduction firm load shedding, relocation of control center operations)

☐ System Disturbance (e.g., loss of firm load, forced outage, frequency excursion, voltage excursion or collapse, islanding or separation, or blackout)

☐ Sabotage/Tampering/Vandalism (e.g., Security breaches, suspected physical or cyber intrusion, surveillance activities, threats)

☐ Equipment failure (e.g., control or monitoring system failure or compromise, communications system failure or compromise)

☐ Other

Incident Details

Please provide the following information, as appropriate, regarding the incident:

Insert Details Here

Cause, if known:

Names and voltage classes of affected transmission assets

NAME	Voltage Class

Names and MW sizes of affected generation assets

NAME	MW

Types of affected cyber assets (e.g., SCADA, relay, automation system)

Describe the impact, if any, on critical infrastructure, public health and safety, or environment.

Narrative (please provide other additional information):

Attachment 2: CSIRP Incident and Testing Form

Date of incident or test _____

List of participants _____

Description of test scenario _____

Were there any lessons learned as a result of this Incident or Test? _____

Lessons
Learned_____
_____
_____
_____

Updates to the CSIRP _____

Date updates are complete _____

Hurricane Plan

Elawan Energy

Version 1.0

Effective Date: 04/15/2022

In the event of a hurricane, the first priority is always the health and safety of Elawan Energy personnel. Elawan Energy's hurricane response process is listed below:

- Ensure all Elawan Energy personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, Elawan Energy personnel must evacuate at a time recommended by local authorities.
- Elawan Energy facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
    - Ensure all loose material or equipment is secured.
    - Ensure proper draining channels exist and are functional

Elawan Energy facilities in Region 1, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 3, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 4, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 5, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 6, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

Elawan Energy shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

When re-entry to the affected facility is safe, it is important to ensure all emergency gear and equipment that may be necessary to clear paths are available, serviceable, and on hand to be used, if necessary. This equipment may include, depending on the circumstances, saws, tire chains, etc.

In the event that the entry route is obstructed or compromised, ensure proper PPE is worn and utilized and normal safety measures are employed.

Always ensure communication is maintained between Broad Reach personnel attempting re-entry and Broad Reach leadership.

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)

- provides a revision control summary that lists the dates of each change made to the PRP since the initial PRP adoption.

Version	Approval Date	Effective Date	Revision Summary
1.0	04/11/2022	04/15/2022	Initial Hurricane Plan

As of 04/15/2022, annexes associated with EOP Version 1.0, approved on 04/11/2022, supersede all previous PRP annexes.

Annex Q - Weather Related Emergencies Plan

Elawan Energy

Version 1.0

Effective Date: 04/15/2022

Preparations for Operations During Extreme Cold Weather Conditions

For severe cold weather, Elawan Energy shall will identify, through inspection, areas of the generating facility that may be most vulnerable to malfunction during extreme cold events. Elawan Energy staff shall ensure the following:

- Elawan Energy staff will ensure heat tracing is present and functional for all appropriate exposed instrumentation and/or equipment, where applicable.
- Where appropriate and necessary, temporary barriers shall be erected to shield sensitive or exposed equipment and instrumentation from wind and freezing precipitation.
- Temporary barriers may be constructed of plastic sheeting or other material that is sufficient to protect exposed equipment and instrumentation, and may contain, if conditions warrant, a portable heat source to keep temperatures above freezing in the designated area.
- Other measures may be taken, as the generation facility staff see fit, to protect the facility during an extreme cold weather event.

Preparations for Operations During Extreme Hot Weather Conditions

For extreme hot weather, Elawan Energy staff shall ensure the following:

- Proper ventilation is present and functional for any areas where extreme hot temperatures may negatively impact generator output.
- In addition to this, portable fans may be mobilized to force air around potentially affected areas.

In all cases, Elawan Energy's staff will ensure that any substation or switchyard equipment that it owns is properly weatherized. This includes the following:

- Ensuring all breaker and transformer oil levels, SF6 levels, nitrogen levels, and air compressor tank levels are adequate for that equipment manufacturer and model.
- Heaters in breaker and transformer cabinets are functioning properly
- Adequate supply of spare gas and oil is available to be used during an emergency

It is important, after any weather-related emergency, to analyze the performance of the generating plant, identify any equipment failures that occurred (if any), and develop and action plan to address those issues. These issues may include the following:

- A list of equipment that failed during the last cold or hot weather event must be identified and addressed. Additionally, any critical failure points identified must be tracked through the normal maintenance processes to ensure appropriate maintenance has taken place for the identified equipment. Any facility equipment design limits that could limit generator output must be identified and addressed, to the extent possible, to ensure no interruption of operations occurs during an extreme weather event.
- Elawan Energy's staff shall actively monitor all potential extreme weather events that may affect their facilities, to include sever weather and operational circumstances arising from those events. Elawan Energy staff will continue monitoring weather forecasts and ERCOT operational data aid in predicting conditions on the BES that may impact operations.
- If the facility is located in an area where flooding is expected, it is imperative to ensure entry and egress routes are hardened to the extent possible. Make sure to elevate and/or secure equipment that may be subject to being carried away by flood currents, and ensure cabinets, control house, and other fixed structures are weatherproofed to extent possible.

elawan energy | AN ORIX COMPANY

NAME
Elawan Energy
Company Address

Telephone
Email

Public Utility Commission of Texas

PO Box 13326
Austin, TX 78711-3326

CC/BCC Block:
Enclosure:

Greetings:

This letter is to serve as notice to the Public Utility Commission of Texas that all relevant Elawan Energy operating personnel are familiar with Elawan Energy's Emergency Operations Plan (*EE-EOPW-1 Severe Weather Emergency Operations Plan*) and are familiar with their duties contained therein. Elawan Energy's relevant operating staff, and its senior management are committed to following the Emergency Operations Plan, and to the extent that deviations are required, they must be appropriate for the operating conditions during the course of the emergency. Feel free to contact me with any questions or concerns.

Sincerely,

NAME

Position
Elawan Energy

ERCOT Nodal Protocols

Section 22

Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations

May 1, 2020

Declaration of Completion of Generation Resource Winter Weatherization Preparations

Winter Peak Load Season: December 20___ through February 20___

Resource Entity (or Entities): Resource Entity (or Entities)

This declaration applies to the following Generation Resources (list by Resource Site Code):
Generation Resource(s)

I hereby attest that all weatherization preparations for equipment critical to the reliable operation of each of the above-listed Generation Resources during the time period stated above are complete or will be completed, as required by the weatherization plan applicable to each Generation Resource. Any outstanding weatherization preparations are summarized in the attached document and include the name of the Generation Resource, a brief description of the remaining weatherization task(s) if any, and an associated target completion date for each task.

By signing below, I certify that I am an officer or authorized executive of each Resource Entity listed above, that I am authorized to execute and submit this declaration on behalf of each Resource Entity listed above, and that, to the best of my knowledge, the statements contained herein are true and correct.

_____
Signature

_____
Name

_____
Title

_____
Date

The following files are not convertible:

Attachments B-E_EE-EOP-1 Severe Weather Emergency Operations Plan.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.

Elawan Energy

Sever Weather Emergency Operations Drill

Introduction:

It is imperative to consider as many weather-related issues as possible when developing the tasks for your Severe Weather Emergency Operations Drill (Drill). Equally as important is determining the appropriate staff to address these issues, timing, contracts and dependencies on external entities, all while maintaining clear and unambiguous instructions. This Drill is designed to ensure Elawan Energy addresses as many of these issues as possible, helping to ensure continued operations of its generating facilities during extreme weather conditions.

Staffing:

All Elawan Energy personnel participating in the Drill will be notified directly, with a clear set of tasks to be completed. Should the tasks need to be performed in a sequential order, appropriate personnel shall be instructed on the timing and order of tasks, stressing clear, concise communication throughout the process. Example - If a switchyard operator is required to open a breaker, he must have the proper switching order as a prerequisite and abide by Elawan Energy's Lock-out/Tag-out process. It is important to identify adequate staff to complete the necessary tasks to ensure continuous operation of the generating facility, to the extent possible.

Task Identification:

For inverter-based resources, such as wind, storage, and solar facilities, the weatherization tasks may require less barriers and portable heaters than a conventional generation site; however, these measures can be utilized to keep exposed equipment above freezing temperatures or sheltered from precipitation where necessary.

Carefully list all tasks to be performed in Attachment B of the Severe Weather Emergency Operations Plan, as well as assigning the tasks to the appropriate personnel. It is important to note that severe conditions may warrant more resources to execute a task than normal operating conditions, so it is imperative that equipment like snow chains, de-icing solution(s), extra fuel, etc., are available. Attachment B will require an action item be assigned to personnel (listed by name), a description of the task, date, completion status (for tracking purposes), and any notes or comments taken during the drill.

Sample Tasks:

- Procurement and distribution of fuel for emergency generators, if applicable.
- Procurement and distribution of spare SF6, nitrogen, or oil for switchyard equipment.
- Management of transportation for personnel participating in the Drill.
- Establishment of emergency operations communications, cell phones, satellite phones, radios, etc.
- Communication of tasks and continual updates via the communication platforms used in the Drill.
- Erection of temporary barriers
- Procurement and placement of portable heaters and extra fuel.
- Inspection of plant and balance of plant equipment to ensure heaters (breaker panels, for example) and instrumentation are serviceable and properly insulated, where applicable.
- All necessary PPE is on hand and available for staff.
- Establish communication with ERCOT, QSE, and appropriate transmission entities, to keep them informed of any developing issues that may impact operation of the facility.
- Ensure proper equipment is on hand and available for clearing paths to the facility, should there be downed vegetation or obstructions.

Review and Correction:

In the vent that vulnerabilities or issues were identified during the Drill, appropriate Elawan Energy staff shall conduct a review of the Drill, corrective actions to be taken, and document those corrective actions in Attachment B. This review should include an extent of conditions assessment and root cause analysis in order to address any latent issues that may exist in other areas.

Pandemic & Epidemic Business Continuity Plan

Elawan Energy

Version 1.0

Effective Date: 04/15/2022

Contents

EXECUTIVE SUMMARY & APPROVAL

Introduction:

Considering recent responses to pandemics and epidemics, Elawan Energy has developed this plan (PRP) to address the subject of business continuity, in the face of a widespread medical event, such as a pandemic or an epidemic. This Plan provides a framework, guidance, and concept of operations to support Elawan Energy's efforts to continue and/or rapidly restore critical business functions in the event of a disruption to normal operations. This plan includes an overview of continuity operations, outlines the approach for supporting Elawan Energy's critical business functions, and defines the roles and responsibilities of staff. It also outlines the orders of succession, notification procedures and communication methods, plan activation and deactivation protocols, provisions for alternate work locations, and the plan for maintaining and restoring access to vital records.

This plan establishes procedures and processes to maintain operational continuity for businesses based on the loss of services due to a reduction in workforce (e.g., during pandemic influenza).

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)
		Maintain
		Implement
		Revise

- provides a revision control summary that lists the dates of each change made to the PRP since the initial PRP adoption.

Version	Approval Date	Effective Date	Revision Summary
1.0	04/11/2022	04/15/2022	Initial Pandemic and Epidemic Response Plan

As of 04/15/2022, EOP Version 1.0, approved on 04/11/2022, supersedes all previous PRPs.

INTRODUCTION

Overview:

Continuity of Operations planning ensures Elawan Energy is able to continue or quickly resume performing critical business functions, which are the functions that support the organization's mission, comply with legal requirements, and support life-safety, under all circumstances, to the extent possible. The benefit of this planning includes the ability to anticipate response actions following a pandemic or epidemic, improve the performance of its generating and operations facilities, and ensure timely recovery.

Plan Scope & Applicability:

The Elawan Energy Pandemic Response Plan (PRP) is applicable once the safety of employees, customers, and guests has been verified. It can be active during normal business hours and after hours, with and without warning.

Plan Objectives:

The objective of the Elawan Energy PRP is to facilitate the resumption of critical operations and functions in a timely and organized manner to ensure a viable and stable organization. In doing this it is critical to ensure the safety and well-being of employees, customers, and guests. The primary objectives of the plan are to:

- Maintain Critical Business Functions during the pandemic or epidemic
- Adjust business functions to address staffing issues
- Ensure employees are able to perform work remotely, where applicable and appropriate
- Protect vital records

Plan Assumptions:

The following assumptions were used while creating this plan:

- An event has occurred that affects normal business operations.
- Access to Elawan Energy facilities may be limited.
- Qualified personnel are available to continue operations.

CRITICAL BUSINESS FUNCTIONS

Overview:

Critical business functions are those functions and critical activities that Elawan Energy must maintain in a continuity situation, when there has been a disruption to normal operations, in order to sustain the mission of the organization, comply with legal requirements and support life-safety. They are the backbone of business and must be continued in order for Elawan Energy to continue to meet its mission. These functions are not meant to be the name of a division, program, unit, etc. but meant to be the actual process/function that must be continued. These processes/functions can be supported or 'owned' by different divisions/units but the unit itself is not a critical business function. Each PRP will inevitably be different, with its own unique challenges posed by the pandemic/epidemic, therefore, the following sample bullets should be used to define business practices and operations during such periods:

- Function - Enter the specific function that may need to be resumed.

- Business Process to Complete - Write a high-level description of the function process. Include any specific forms or systems that may be needed. Supporting Activities
- Supporting activities - Those tasks performed to achieve a critical business function and should be described.
- Lead Point of Contact (POC) and Alternate - Identify and include contact information, if necessary, for staff POCs for each supporting activity.
- Vendors and External Contacts - Identify and include contact information, if necessary, for vendor POCs for each supporting activity.
- Vital Records - Vital Records are those records a business needs to sustain the mission of the organization and comply with legal requirements. Vital records must be stored in multiple places in multiple formats. The identification, protection, and ready availability of vital records needed to support essential functions are critical components of a successful PRP.
- Maximum Allowed Downtime - Identify the amount of time your business could afford for the function to be down before it could cause irreparable harm. Consider using the following units:
    - Less than 24 hours
    - 1 day to 1 week
    - 1 to 2 weeks
    - 2 to 4 weeks
    - 30 days or greater
- Criticality - Enter High, Medium, or Low depending on how critical the function is to the operations of your business. Following are some considerations to use when determining criticality:
    - What business objective/goal does this function support?
    - How often does this function occur?
    - How many business units (departments) or people perform this function?
    - Does the successful completion of this function depend on any other functions?
    - Are other functions dependent on this function for its successful completion?
    - Is there a potential for revenue loss if this function is not completed?
    - Is there a potential for fines, litigation, additional downtime, or other punishment for noncompliance due to a regulatory requirement (NERC or ISO)?
    - What priority ranking would you give this function as compared to other functions?

Required Resources:

- People: Identify the number of employees required for this function. Also identify if a staggered resumption of employees is an option.
- Equipment: Identify the type of equipment and how many would be required in order to get this function back in operation.
- Supplies: Identify any unique supplies required for this function (do not list items that could be easily purchased from an office supply store). This would include any paper forms or documents needed.

- Information Technology: Identify software (e.g., Microsoft Office, QuickBooks, etc.), systems, applications, and electronic documentation needed to complete the function.
- Interdependencies: List other business functions this function relies on to be operational.

Identification of Staff Required to Continue Business Operations:

In the event of a pandemic or epidemic, work absences, due to medical issues attributed to the widespread medical event, can lead to dramatic decreases in productivity, potentially leading to the shutdown of facilities. To maintain the best possible operational posture, it is imperative to communicate duties to the appropriate personnel, helping to ensure Elawan Energy's facilities can remain operational to the greatest extent possible. In many cases, employees may log in remotely and perform their duties, fostering as much of an illness-free atmosphere possible, however, there will be the need for onsite staff to maintain and operate facilities, leading to the identification of mission essential staff and reporting structures. Elawan Energy senior management will identify those mission essential individuals and will communicate tasks to them. As each case may differ, there will be no "One-size-fits-all" approach, and each response to a pandemic or epidemic will require its own set of responsible personnel and tasks. It is imperative that all possible measures are taken to keep Elawan Energy staff from contracting or spreading the illness. Maintaining social distancing, where appropriate and possible, wearing proper PPE, and maintaining hygienic work and living spaces is crucial to combatting a widespread medical event. Depending on the nature of the event, the measures below may serve to facilitate the continued operations of Elawan Energy facilities:

- Wearing of PPE
    - Masks (N-95 or similar)
    - Social distancing
    - Proper hygiene
    - Eye, face, or other protection (as applicable)
- Remote work, where appropriate and possible
- Encourage the use of approved medications and/or vaccine(s)

TABLE 1

Elawan Energy Company Critical Business Function				
Critical Business Function 1:				
Business Process To Complete:				
Supporting Elements				
Supporting Activities (Describe)	Lead POC Alternate	Vendors and External Contacts	Vital Records	Maximum Allowed Down Time Criticality
Activity	Position Title Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days High/Med/Low
Activity	Position Title Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days High/Med/Low
Activity	Position Title Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days High/Med/Low
Implications if not Conducted: *Interruption and/or loss of this function would interrupt…Furthermore, it would result in a delay of the capability to…*				
Calendar Dependent: *(e.g., this function is always occurring, this function only occurs in summer months, this function is active during inclement winter weather, etc.)*				
Required Resources: *Staff, equipment, supplies, Information Technology, and other resources.*				
Facilities: *Standard office space that can accommodate up to X people at any time. Traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet, radio, and other telecommunications services.*				
Supporting Partners: *List private sector or public sector supporting partners.*				
Vital Records: *List relevant vital records and their location, if appropriate.*				

PLAN ACTIVATION PROCEDURES

Plan Activation During Normal Business Hours:

If it is determined that the facility cannot be re-inhabited, the Business Owner or designee will inform personnel on next steps. Employees may be instructed to go home to await further instructions or move to an alternate site. Further communications, such as instructions on where and when to report for work will be made using communication methods such as email, phone calls, texts, or other communication methods.

Plan Activation Outside Normal Business Hours:

If an event occurs outside normal business hours that renders a facility uninhabitable, the Business Owner or designee will activate the PRP using email, phone calls, texts, or other communication methods.

Actions upon Activation:

Upon activation of the PRP, the Business Owner or designee will be responsible for notifying all affected personnel of their duties and where they will be performing those duties (remotely or at a site).

ORDERS OF SUCESSION AND DELEGATIONS OF AUTHORITY

Overview:

Orders of succession are prepared to provide clarity of senior leadership roles in the event that individuals in these roles, whether they be decision-making or management roles, are unavailable due to effects of a pandemic or epidemic. A delegation of authority provides successors with the legal authorization to act on behalf of critical positions within the organization for specific purposes and duties.

Orders of Succession:

These orders of succession are a formal and sequential list of senior leadership positions, written by position and not name, to identify who is authorized to assume the role of a position, should the incumbent be unavailable. The term unavailable means the incumbent of a position is not able, because of absence, disability, incapacity, or other causes, to exercise the powers and duties of an office. Pre-identifying orders of succession is critical to ensuring the continuation of effective leadership during an incident that disrupts operations.

Delegations of Authority:

Delegations of authority are the legal authorization to act on behalf of critical positions within the organization for specific purposes and duties. In order to ensure the rapid response to any situation requiring the activation of a PRP employees who serve in key senior leader positions must develop and

maintain pre-delegated authorities for policy determinations and decisions, as needed. The delegations of authority should include what type of authority is being delegated, such as signatory or credit card authorization for purchasing, and also limitations of the delegated authority. All duties of each senior leader are delegated to the position in the orders of succession when the incumbent cannot fulfil that authority for any reason, including but not limited to:

- Absence
- Illness
- Leave
- Death

Each authority is also terminated when the incumbent returns. The importance of previously delegated authorities is to ensure that important functions or authority can continue should the primary position become unavailable to complete their given functions. Staff who hold critical positions must maintain the pre-delegated authorities through effective cross-training and exercises for their successors.

How to Complete the Delegation Table (Table 2)

This table is customizable and has no limit to how much information should be in them. Please copy/paste to create a table for each position that must be continually occupied.

Position to be succeeded - This should be the title of the position that will need to be filled in the event a staff member becomes unavailable.

Successors - This should be the title of the position, not an individual, that will need to fill the position identified in the first column. They should be listed in sequential order.

Delegated authorities - These are the task and responsibilities held by the position delineated in the first column.

Activation and termination triggers - Select from incapacitated, unavailable, or selective decision as a reason for activation, per each position. Termination can be identified as sample language suggests or alternations can be made to termination thresholds.

Table 2

Position to be Succeeded	Successors	Delegated Authorities	Activation and Termination Triggers
Department Lead	*Successor 1*	*Delegated authorities or all duties as assigned*	*Activate: Incapacitated, unavailable, or selective decision* *Terminate: Return of Director*
	Successor 2	*Delegated authorities or all duties as assigned*	*Activate: Incapacitated, unavailable, or selective decision* *Terminate: Return of Director*
	Successor 3	*Delegated authorities or all duties as assigned*	*Activate: Incapacitated, unavailable, or selective decision* *Terminate: Return of Director*

PLAN DEACTIVATION

Overview:

PRP deactivation is the process of demobilizing the alternate facility and restoring critical business functions to the primary facility or a new facility that will permanently replace the damaged facility. Plan deactivation may not consist of an exact replacement of lost facilities, equipment or processes. The goal of plan deactivation is to reestablish full capability in the most efficient manner. In some continuity incidents, extensive coordination may be necessary to backfill staff, procure a new operating facility, and re-establish vital records. When it is determined the PRP activation has ended, all personnel should be informed that the necessity for continuity operations no longer exists and the return to normal operations will begin.

Criteria for PRP Deactivation:

The business owner or designee will determine, based on input from medical authorities, staff, or other entities when it is safe and when the organization is prepared to restore or transfer critical business functions to a facility for long term usage. Critical business functions must be restored in priority sequence based upon the classification and criticality of the function. The following elements are typically completed prior to plan deactivation.

- Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort.

- Temporarily suspend non-critical functions, as necessary, to support the resumption efforts.
- As applicable, utilize other personnel, such as contract personnel, to support the resumption efforts.

Resumption Process:
Provide information as to how each function outlined in table 3 will be resumed and which staff members need to be active participants in this process.

How To Complete The Plan Deactivation Table - The following information details how to complete elements of Table 3 below. When completing this table, minimize the use of acronyms and describe actions in plain terms so that staff members who may be unfamiliar with the function will be able to use the document to resume and sustain the critical business function, if necessary.

Table 3

Item	Function	Supplies	Required Resources
1			
2			
3			
4			

Employee Contact List:

Table 4

Employee Name	Title/Responsibilities	Phone Number	Personal Email Address

Vendor Contact List:

Table 5

Vendor	Resource/Service	Phone Number	Email Address

Emergency Operations Plan

Elawan Energy

Version 1.0
Effective Date: April 15, 2022

This Emergency Operations Plan (EE-EOP-001) is developed to comply with PUCT Rule 25.53

Contents

Approval and Implementation

Introduction:

- This EOP is developed to help ensure Elawan Energy's continued power generation operations in the event of emergency conditions, including, but not limited to pandemic(s) or severe weather. This plan includes the necessary elements, pursuant to PUCT Rule §25.53.

The following individuals are responsible for maintaining the EOP.

Name	Title	Date
Rogelio Hernandez	Construction & Technical Director	04/10/2022

- provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (1) of this subsection.

Version	Approval Date	Effective Date	Revision Summary
1.0	04/10/2022	04/15/2022	Initial Emergency Operations Plan

As of 04/15/2022, EOP Version 1.0, approved on 04/10/2022, supersedes all previous EOPs.

Communication Plan

An entity with generation operations must describe the procedures during an emergency for communicating with,

- Media outlets
- PUCT
- QSE
- Fuel suppliers
- Local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity
- ERCOT, as the Reliability Coordinator, Balancing Authority, and ISO.

Elawan Energy Emergency Operations Contact List

EMERGENCY OPERATIONS CONTACT LIST (EXTERNAL)			
NAME	ENTITY	PHONE NUMBER	EMAIL
Shift Supervisor	ERCOT		
QSE			
Elawan Energy Management			
Fuel Supplier			
PUCT Infrastructure Staff		512-936-7197	

Elawan Energy Internal Emergency Operations Contact List

INTERNAL ELAWAN ENERGY EMERGENCY OPERATIONS CONTACT LIST			
NAME	ENTITY	PHONE NUMBER	EMAIL
Shift Supervisor	ERCOT		
QSE			
Elawan Energy Management			
Fuel Supplier			
PUCT Staff			

Definitions and Acronyms

TERM	ACRONYM	DEFINITION
Annex		A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill		An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Electric Reliability Council of Texas	ERCOT	Independent System Operator for approximately 90% of the state of Texas.
Emergency		A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity		An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard		A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Power Generation Company	PGC	Generates electricity intended to be sold at wholesale and does not own a transmission or distribution facility in this state (with some exceptions, see PUC Substantive Rule 25.5(23) and 25.5(45)).
Public Utility Commission of Texas	PUCT	The PUCT is the regulatory body for energy entities in the state of Texas.
Qualified Scheduling Entity	QSE	Submit bids and offers on behalf of resource entities (REs) or load serving entities (LSEs) such as retail electric providers (REPs).
State Operations Center	SOC	The SOC is operated by TDEM on a 24/7 basis and serves as the state warning point.
Texas Department of Energy Management	TDEM	coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters.
Threat		The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

Executive Summary

As a registered PGC, Elawan Energy is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. Elawan Energy has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) before COD if it is a new facility or (b) within 30 days of a substantive change to the plan. Any substantive change to the plan, made between November 1st and April 30th must be filed no later than June 1st of that year. If a substantive change is made to the plan between May 1st and October 31st, the submission date is no later than December 1st of that same year. At all times, the most recent approved copy of the Elawan Energy Emergency Operations Plan must be available at the Elawan Energy's main office for PUCT inspection.

For Elawan Energy, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

Maintenance of Pre-identified Supplies for Emergency Response

A plan to maintain pre-identified supplies for emergency response.

Elawan Energy staff shall identify any supplies necessary for continued operations during an extreme weather event, and must procure, to the extent possible, those supplies. A list of some of these supplies is contained below:

- Fuel for generator
- Fuel for heaters
- Gas for breakers or load-interrupting switches (if applicable)
- Oil and nitrogen for transformers (if applicable)
- Parts used for maintenance or repair of equipment
- Fuel for vehicles (if applicable)
- Etc.

See Annex D for a listing of supplies required for emergency response.

Evidence - Any evidence that supplies were requested and procured prior to the extreme weather event. Please use the appropriate details from the bulleted list above for supplies. Completed Annex D.

Staffing During Emergency Response

A plan that addresses staffing during emergency response. Elawan Energy will identify appropriate staff and staffing levels to respond to emergency conditions, including, but not limited to severe weather events, physical threats or physical damage, and cyber security events.

Elawan Energy shall identify operational and management staff that will remain on call or on stand-by for the duration of the emergency (Annex C). This list may be dynamic and will be subject to change should conditions warrant it.

Evidence - Annex C should be completed to reflect a staffing plan for severe weather events. Secondary evidence would consist of dated emails or documented evidence that staff was notified and understood their expectations during this event.

Weather Emergency

- operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;
- verification of the adequacy and operability of fuel switching equipment, if installed; and
- a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

For severe cold weather, Elawan Energy shall identify, through inspection, areas of the generating facility that may be most vulnerable to malfunction during extreme cold events. Elawan Energy staff shall ensure the following:

- Elawan Energy staff will ensure heat tracing is present and functional for all appropriate exposed instrumentation and/or equipment, where applicable.
- Where appropriate and necessary, temporary barriers shall be erected to shield sensitive or exposed equipment and instrumentation from wind and freezing precipitation
- Temporary barriers may be constructed of plastic sheeting or other material that is sufficient to protect exposed equipment and instrumentation, and may contain, if conditions warrant, a portable heat source to keep temperatures above freezing in the designated area.
- Other measures may be taken, as the generation facility staff see fit, to protect the facility during an extreme cold weather event.

For severe hot weather, Elawan Energy staff shall ensure the following:

- Proper ventilation is present and functional for any areas where extreme hot temperatures may negatively impact generator output.
- In addition to this, portable fans may be mobilized to force air around potentially affected areas.
- Ensure normal facility cooling measures are maintained and operational.

In all cases, Elawan Energy staff will ensure that any substation or switchyard equipment that it owns is properly weatherized. This includes the following:

- Ensuring all breaker and transformer oil levels, SF6 levels, nitrogen levels, and air compressor tank levels are adequate for that equipment manufacturer and model.
- Heaters in breaker and transformer cabinets are functioning properly
- Adequate supply of spare gas and oil is available to be used during an emergency

Evidence - Maintenance records, records of inspection at generating sites, photos of erected temporary barriers, portable heaters in service, heat trace application photos, photos of unobscured ventilation, photos of any cooling measures deployed photos of any other weatherization measures with dates. If any breakers or transformers fall under the facility's purview, dated inspection and maintenance records detailing heater functionality and oil and gas levels and a list of any spare bottles of gas or stores of oil.

A water shortage annex that addresses supply shortages of water used in the generation of electricity;

Elawan Energy assets do not use water to generate power.

An attestation declaring this portion of the plan is not applicable should suffice as evidence.

A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;

Elawan Energy's plan for emergency operation addresses its process for recovering generation capacity, should an emergency force a derate, a unit trip, or inability to generate and fulfill its MW obligations. These actions are listed in Annex E.

Evidence - By completing Annex E, document all actions taken to address any inability to generate MW along with a detailed description of communications to QSE and/or ERCOT.

A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;

In the event of a hurricane, the first priority is always the health and safety of Elawan Energy personnel. Elawan Energy's hurricane response process is listed below:

- Ensure all Elawan Energy personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, Elawan Energy personnel must evacuate at a time recommended by local authorities.
- Elawan Energy facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
    - Ensure all loose material or equipment is secured.
    - Ensure proper draining channels exist and are functional

Elawan Energy facilities in Region 1, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 3, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 4, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.
Elawan Energy facilities in Region 5, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Elawan Energy facilities in Region 6, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

Elawan Energy shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

Evidence - Complete Annex C and document any actions taken to address any vulnerabilities found and addressed while completing the checklist.

A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels

An affidavit is required, as Elawan Energy facilities do not use alternate fuels.

Affidavit from an owner, partner, officer, manager, or other official with responsibility for Elawan Energy's operations affirming that all relevant Elawan Energy operating personnel are familiar with the contents of the emergency operations plan; and such personnel are committed to following the plan except to the extent deviations are appropriate under the circumstances during the course of an emergency.

Completed, executed, and notarized Annex H.

PUC Filing Requirements

Elawan Energy must file an emergency operations plan (EOP) and executive summary no later than April 15, 2022.

- An entity must file with the commission:
  - an executive summary that:
    - describes the contents and policies contained in the EOP;
    - includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
    - includes the record of distribution required under paragraph (4)(A) of this subsection; and
    - contains the affidavit required under paragraph (4)(C) of this subsection; and
  - a complete copy of the EOP with all confidential portions removed.
- For an entity with operations within the ERCOT region, the entity must submit its unredacted EOP in its entirety to ERCOT.
- In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:
  - A record of distribution that contains the following information in table format:
    - titles and names of persons in the entity's organization receiving access to and training on the EOP; and
    - dates of access to or training on the EOP, as appropriate.
  - A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
  - An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
    - relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and

such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
- the EOP has been reviewed and approved by the appropriate executives;
- drills have been conducted to the extent required by subsection (f) of this section;
- the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Annual Review

An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

- An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:
  - file with the commission an executive summary that:
    - describes the changes to the contents or policies contained in the EOP;
    - includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
    - includes the record of distribution required under paragraph (4)(A) of this subsection; and
    - contains the affidavit required under paragraph (4)(C) of this section;
  - file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
  - submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.
- An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:
  - a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;

- an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and
- the affidavit described under paragraph (4)(C) of this subsection.

Annual Drill

An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

By applying the Emergency Operations Drill Instructions and completing Annex B, Elawan Energy Emergency Operations Plan shall be tested each year, no later than INSERT DATE HERE, and includes a review section, to identify and correct any vulnerabilities in the Emergency Operations Plan. Elawan Energy Emergency Operations Drill Procedure has a section dedicated to any generation facility that is located within a defined hurricane evacuation zone.

Evidence - Emergency Operations Drill documentation, instructions, Annex B, attendance/participation records with dates and names.

Elawan Energy, as a registered RE, shall provide ERCOT with any updated versions of their emergency operations plan by **June 1** *for any updates made between November 1 and April 30*, and by **December 1** *for any updates made between May 1 through October 31*. Elawan Energy shall submit all updated plans electronically. Annex I is the attestation ERCOT requires for notification, along with the EOP.

Evidence - Electronic copy or screenshot of successful submittal to ERCOT (annex I and complete plan, should there be any updates).

A cyber security annex;

- The Elawan Energy Cyber Security Incident Response Policy (Annex J) contains this information.

A physical security incident annex;

This section contains reporting for physical threats to any Elawan Energy facility, as well as actual damage to or destruction of any Elawan Energy facility, per NERC Reliability Standard EOP-004. The DOE digital form, OE-417 shall be used to communicate physical attacks and cyber security incidents.

Please see Annex G1 - Elawan Energy Physical Threats & Evacuation Examples, and Annex G2 - Bridgelink Pitts Dudik Security Plan.

Annex G3 - Elawan Physical Security Plan

A pandemic and epidemic annex;

Elawan Energy's existing pandemic/epidemic plan for business continuity is listed in Annex F.

Executive Summary Emergency Operations Plan

Elawan Energy

Version 1.0

Effective Date: 04/15/2022

Executive Summary:

As a registered PGC, Elawan Energy is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. Elawan Energy has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) before COD if it is a new facility or (b) within 30 days of a substantive change to the plan. Any substantive change to the plan, made between November 1st and April 30th must be filed no later than June 1st of that year. If a substantive change is made to the plan between May 1st and October 31st, the submission date is no later than December 1st of that same year. At all times, the most recent approved copy of the Elawan Energy Emergency Operations Plan must be available at the Elawan Energy's main office for PUCT inspection.

For Elawan Energy, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

- Maintenance of Pre-identified Supplies for Emergency Response
- List of primary and, if possible, backup emergency contacts
- Affidavit stating the following:
    - Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
    - The EOP has been reviewed and approved by the appropriate executives;
    - Drills have been conducted to the extent required by subsection (f) of the rule;
    - The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
    - The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
    - The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training
- Annexes to be included in the EOP - A Generation resource/PGC must include
    - A weather emergency annex that includes
        - Operational plan for responding to a cold and hot weather emergency, distinct from the weather preparations required under § 25.55
            - EOP-001, page 7 and Annex Q
        - Verification of the adequacy and operability of fuel switching equipment, if installed; and
            - EOP-001, page 9. It is not applicable to this site.
        - A checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency
            - Annex D

- A water shortage annex that addresses supply shortages of water used in the generation of electricity;
  - EOP-001, page 8. This is not applicable to this site.
- A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;
  - Annex E
- A pandemic and epidemic annex;
  - Annex F
- A hurricane annex that include evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
  - Annex L
- A cyber security annex;
  - Annex J
- A physical security incident annex; and
  - Annex G (1-3)
- Any additional annexes as needed or appropriate to the entity's particular circumstances

- Drills
  - Annex B

As a registered PGC, it is Elawan Energy's intent to fully comply with all requirements and expectations of the Public Utilities Commission of Texas.