



## **Filing Receipt**

**Filing Date - 2025-01-07 12:53:50 PM**

**Control Number - 53385**

**Item Number - 2597**

## AFFIDAVIT

**STATE OF TEXAS           §**

**COUNTY OF DALLAS     §**

BEFORE ME, on this day appeared Jason Allen, who after being first duly sworn, does hereby affirm and state the following:

1. My name is Jason Allen. I am an officer with binding authority over Sweetwater Wind 4, LLC (“Sweetwater Wind 4”), a registered power generation company (PUCT registration number 20173). I am over 18 years of age and competent to make this Affidavit.
2. All relevant operating personnel at Sweetwater Wind 4 are familiar with and have received training on the applicable contents and execution of Sweetwater Wind 4’s Emergency Operations Plan (“EOP”). Such personnel have been 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.
3. Sweetwater Wind 4 has conducted its annual drill to the extent required by PUC Subst, R. § 25.53(f).
4. A summary of the EOP has been distributed to local jurisdictions as needed.
5. Sweetwater Wind 4 maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
6. Sweetwater Wind 4’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest required National Incident Management System Training

\_\_\_\_\_  
Jason Allen

Sworn and subscribed before me this 29th day of June, 2023.

\_\_\_\_\_  
Notary Public in and for the State of Texas  
My commission expires on \_\_\_\_\_

(SEAL)



June 29, 2023

Public Utility Commission of Texas  
Attention: Filing Clerk  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, TX 78711-3326

Re: PUC Project No. 53385 Sweetwater Wind 5 EOP Attestation

In accordance with the Public Utility Commission of Texas Substantive Rule § 25.53, Sweetwater Wind 5, LLC confirms no material changes made to the site's emergency operations plan or its emergency contact list in the previous calendar year.

A handwritten signature in black ink, appearing to read "Rob Robertson", is written over a horizontal line.

Rob Robertson  
Sr. Director of Regulatory Compliance  
Leeward Renewable Energy





June 29, 2023

Public Utility Commission of Texas  
Attention: Filing Clerk  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, TX 78711-3326

Re: PUC Project No. 53385 - Emergency Action Plan Submission of Sweetwater Wind 4, LLC,  
PGC Registration No. 20177

Dear Filing Clerk:

In accordance with the Public Utility Commission of Texas Substantive Rule § 25.53, Sweetwater Wind 4, LLC hereby submits its Emergency Action Plan (EAP). This submission includes the following:

1. An executive summary that (a) describes the contents and policies set forth in the EAP, (b) includes references to specific sections and page numbers of the EAP that correspond to the requirements of Rule §25.53, and (d) includes an affidavit; and
2. A complete copy of the Confidential EAP is designated as Protected Information and is being submitted under seal as Confidential; and
3. An attestation certifying no substantial updates made to the EAP or it's contacts in the previous 12 months.

Please contact me should you have any questions at [Rob.Robertson@LeewardEnergy.com](mailto:Rob.Robertson@LeewardEnergy.com), or 214-399-0893.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rob Robertson", written over a horizontal line.

Rob Robertson  
Senior Director of Regulatory Compliance  
Leeward Renewable Energy



Emergency Action Plan Submission of Sweetwater Wind 4, LLC  
Executive Summary

Contents and Policies in EAP

Leeward Renewable Energy, LLC (LRE) owns and operates the Sweetwater Wind 4, LLC (SW4) facility, which is a wind-powered facility with a nameplate capacity of 240.8 MW located in Roscoe, Texas. The Sweetwater Emergency Action Plan (EAP) sets forth procedures and actions to be followed by SW4 site personnel and contractors performing work at the site to address emergencies. The EAP is designed to maximize human safety, limit damage to the environment, ensure safe operation of the site to the extent practicable, and address external and internal emergency communications and notifications. The EAP addresses the following:

1. Roles and responsibilities of the Plant Manager and site personnel,
2. Reporting emergencies,
3. Site muster locations,
4. Training,
5. Emergency contact information,
6. Emergency response procedures,
7. Injury response procedures,
8. Chemical spill response procedures,
9. Fire response procedures,
10. Bomb threat response procedures,
11. Sabotage and physical security plans,
12. System restoration plans,
13. Pandemic response plans,
14. Communication plans,
15. Cyber security and incident response plans,
16. Hazardous material response plan,
17. Natural disasters and severe weather plans,

Sections and page numbers of EAP corresponding to the requirements of PUCT Substantive Rule § 25.53.

<b>PUCT Rule § 25.53 Requirements</b>	<b>SW5 Corresponding EAP Reference</b>
Approval and implementation	Sections 2, 3, 4 & 5
Communication Plan	Section 5
Plan to maintain pre-identified supplies for emergency response	Section 12 and Attachment 7, subsection 7.a
Plan addressing staffing during emergency response	Attachment 7, Attachment 9
Plan addressing how entity identifies weather-related hazards	Attachment 7
Weather emergency annex	Attachment 7
Water shortage annex	Water is not required for generation.
Fuel switching equipment	Wind-powered facility, not applicable
Restoration of service annex	Attachment 14
Pandemic and epidemic annex	Attachment 9
Hurricane annex	Site is not identified by the TDEM as a hurricane zone.
Cyber security annex	Attachment 12
Physical security incident annex	Attachment 13





# LRE Procedure – Emergency Operations Plan, Sweetwater 4, 5 Solar

Issued: May 20, 2024

Version: 2.00

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Prepared by

Date





Procedure: Emergency Operations Plan  
Sweetwater 4 & 5

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Version History and Review Log





Procedure: Emergency Operations Plan  
Sweetwater 4 & 5

VERSION NO.	DATE	ORIGINATOR	COMMENTS	APPROVED
1	1/15/2021	Regulatory	Initial Implementation	RR
2	5/20/2024		Formatting Updates	RR





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

### 1. Purpose

The purpose of the Emergency Action Plan (EAP) is to establish a set of pre-planned response actions to be taken by personnel in the event of an emergency. The plan aims to minimize health risks to plant personnel and individuals in the surrounding community, while also mitigating adverse impacts on the environment.

### 2. Scope

This document is specific to Leeward Renewable Energy's Morrow Lake Solar Site. The ERP is designed to provide clear instructions to all plant personnel regarding the actions they are required to take in the event of an emergency.

### 3. Regulatory

This procedure has been developed in accordance with the Texas PUC (PUCT) 25.53 Electric Service Emergency Operating Plans. Any revisions to this plan will be provided to the appropriate agencies and regulatory bodies as required by their respective documented statutes. Any annexes not applicable to the Morrow Lake Solar Project have been left out of this emergency operations plan.

### 4. Roles And Responsibilities

- Site Personnel are responsible for understanding the response actions to various types of emergency events as documented throughout this procedure and required in the PUCT 25.53 and 25.55 rulings.
- The Plant Manager must house a paper copy of this Emergency Action Procedure in an accessible location in the O&M building.
- Plant Manager and Regulatory Compliance shall approve all final versions of this procedure
- Regulatory Compliance shall assess the scope of changes and report to Regulatory Authorities where applicable.

### 5. Emergency Operations Plan

#### 5.1 Site Personnel Emergency Responders

Name	Role	Contact Number
To be hired before operations	Site Admin	N/A





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

Jesse Monroe	LRE Site Manager	N/A
To be hired before operations	LRE Lead Tech	N/A
Stevie Fuentes	LRE Regional Director	C: 325-716-3493
Marvin Keith	LRE Asset Manager	C: 832-964-9009
Reynaldo Trejo	LRE Engineer	C: 480-828-2352
OCC	Operations Control Center	Primary: 214-515-1110 Secondary: 214-356-1656
To be hired before operations	OEM Supervisor	N/A
Rob Robertson	Sr. Director of Regulatory Compliance	O: 214-399-0893
Tenaska	Energy Scheduler	O: 817-462-1509 C: 817-579-3060

Table 1. Contact Information

## 6. Regulatory References

This plan has been developed to ensure compliance with the Texas PUC (PUCT) 25.53 and 25.55 Electric Service Emergency Operating Plans. Morrow Lake Solar acknowledges awareness that any significant changes in types or quantities of chemicals or other hazards on the site will necessitate a review of this plan. Any such revisions to this plan will be communicated with appropriate agencies and organizations.

## 7. Site Information

### 7.1 Address

The site is located at 3860 Business Interstate 35E, Pearsall, TX 78061.

## 8. Training and Drills

### 8.1 Employee Training

All LRE employees at the facility shall receive training on this Emergency Action Plan whenever it is modified and annually. Employees will also be trained when this plan is initially implemented. Contractors and visitors who will be working on-site will be trained in the Emergency Action Plan, mustering locations, and evacuation procedures before they are allowed to work on-site for the





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

first time, and at least annually thereafter. A listing of contractors with current training on this plan will be maintained at the facility for reference purposes.

### 9. Meteorological

#### 9.1 Extreme Temperature (Heat)

On extreme temperature days, on-site LRE employees discuss heat protection and are provided with more water and breaks to complete their shifts effectively. In tandem with keeping our employees safe, a protective measure is also being taken to protect the equipment on-site. Details of this are in the sections below.

#### 9.2 Equipment Protection

When it comes to protecting equipment, LRE has many systems in place to protect and ensure the onsite equipment is being protected year-round. To ensure this, this site has backup fans on-site to move air in the control house when temperatures climb. Fans are set to auto and are turned on when a certain temperature is reached. This site also has a weekly fan inspection for operability and performance tests every 3 months. Pipes are checked for tight seals and no cracks, debris, or ability for rodents to enter, as well as extra seals kept in stock in case it is needed.

#### 9.3 Personnel Safety

1. Workers and supervisors share responsibility for safety at the job site. This includes watching out for yourself and others because heat illness can quickly become life-threatening if unnoticed or ignored. Speak up if you notice anything that could be unsafe or result in someone getting hurt or sick.
2. Setting up the worksite for shade.
3. How to utilize shade in work and/or break areas to reduce the heat.
4. Work scheduling to reduce heat exposure.
5. Detail an established work/rest schedule for routine and heavy work.
6. Hydration
  - Avoid drinks with caffeine and high sugar content like sodas, they won't hydrate you.
  - Make sure there is enough water to allow each employee to drink at least a quart of water each hour.
  - Identify who oversees setting up and carrying supplies, checks the water level, and replenishes the supplies.
7. Adjusting to heat (acclimatization)





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- It takes about two weeks to fully adjust to hot working conditions. This adjustment is lost if you are away from the hot conditions for a week or more. Acclimatization is especially critical for heavy work in hot temperatures.

### 9.4 Identification of Critical Components

Morrow Lake Solar has identified relays, the main power transfer, and inverters as the main critical components. To protect these critical components, LRE has systems in place to handle each of these components. For relays, there is an HVAC system that controls the temperature. For the main power transfer, there are cooling fans to ensure the safety of the equipment. Lastly, for inverters, there are air-cooled fans, cabinets, and coolant used to maintain the equipment temperature.

### 9.5 Extreme Temperature (Cold)

The Morrow Lake Solar plant manager is responsible for ensuring personnel are prepared for inclement /adverse weather conditions. Before the winter season, technicians are trained in appropriate clothing and precautions when working in the field during winter weather. Personnel and technicians are responsible for provisioning their vehicles with cold-weather equipment (including gloves, hats, jackets, and other equipment to clear snow and ice).

### 9.6 Equipment Protection

Equipment is visually inspected during weekly technician walk-downs. A comprehensive inspection of the Inverters is performed annually that includes the assessment of any component to address deterioration. Inverters are visually inspected every month from November through March. Morrow Lake Solar Technicians perform maintenance activities on an annual basis that include support elements within the inverters that are maintained and functional. Monthly inspections on the inverters are also performed from November through March.

### 9.7 Personnel Safety

1. Site personnel review weather conditions regularly and discuss forecasts during daily POD (plan of the day) meetings.
2. When cold weather events are forecasted, personnel verify that weatherization checklists have been completed
  - a. Solar facilities have limited options to weatherize panels. The focus of the site is on the inverters and cooling/heating sensors





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

3. Previous checklists are reviewed for required follow-up actions noted
  - a. Any follow-up items are prioritized ahead of the impending weather event
4. Site personnel check provision levels in the O&M building and work vehicles
  - a. Provisions include change of clothes, water, protein bars, or other non-perishable food. These emergency provisions allow site personnel to remain onsite until it is safe to leave, depending on snow/ice build-up on roads out of site.
5. Equipment on outage or repair is reviewed for expedited completion to ensure site capacity is fully available during a weather event
  - a. If not feasible, proper outages are reported to the transmission and system operator
6. LRE operations control center, site leadership, and compliance discuss weather event and temperature operating expectations
  - a. ECWT per NERC EOP-011 reviewed, wind chill factor reviewed

### 9.8 Identification of Critical Components

Morrow Lake Solar has identified relays, the main power transfer, and inverters as the main critical components. To protect these critical components, LRE has systems in place to handle each of these components. For relays, there is an HVAC system that controls the temperature. For the main power transfer, there are cooling fans to ensure the safety of the equipment. Lastly, for inverters, there are air-cooled fans, cabinets, and coolant used to maintain the equipment temperature.

## 10. Wildland Fire

This project is not in a high-risk fire zone. But the appropriate measures will be taken if a fire were to occur. In the event of an incipient stage (beginning, small) fire, employees should notify adjacent individuals of this situation and exit the area. Only employees trained in the use of fire extinguishers or other manual fire suppression systems should attempt to use an extinguisher or system. Employees are not expected or authorized to respond to fires beyond the incipient stage (i.e., fires that are beyond the beginning stage and which cannot be extinguished using a hand-held, portable fire extinguisher). The fire department should be immediately notified by dialing 911 when any type of unintended fire has taken place. Site management shall also be immediately notified of any emergency.

### 10.1 External Fire

1. Call 911 and report the following:
  - o Site name: Morrow Lake Solar







## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- The address of the main entrance: Morrow Lake Solar, 3860 Business Interstate 35 E, Pearsall, TX 78061, or nearest site access point,
  - Injuries, if any, and need for an ambulance.
- 2. Make sure the immediate area of the fire is clear of personnel.
- 3. Account for all employees, contractors, and visitors who were working in the immediate area of the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made throughout the facility to locate the person(s) missing. If the person(s) is equipped with a facility radio, then an emergency transmission shall be communicated to locate the person(s).
- 4. Contact the O&M Manager (if present) and Emergency Response Coordinator (if not the O&M Manager) immediately.
- 5. Remove any obstructions (vehicles, material, etc.) that might impede response to the scene.
- 6. Station available personnel at road intersections to stop traffic flow into the fire scene.
- 7. Evacuate the energy storage system area immediately if the fire warning alarm sounds or fire warning lights illuminate.
- 8. Proceed to the designated muster point for headcount. If onsite, the designated Emergency Response Coordinator will do a head count and relay any information/instructions.
- 9. If you encounter heavy smoke, stay low and breathe through a handkerchief or other fabric; move away from the area.
- 10. Assist anyone having trouble leaving the area so long as doing so does not put the assistor at additional risk.
- 11. Attempt to extinguish the fire ONLY if you have had the appropriate training and proper firefighting agent for the type of fire. Refer to the specific safety data sheet.
- 12. Do not leave the designated muster point until advised to do so. If risk (e.g., smoke) requires evacuation of the muster point, the secondary muster point (designated on the map in Appendix 1) will be used and that fact announced via radio and alarms as available.
- 13. The Emergency Response Coordinator will issue an 'all clear' only when the fire department informs them that it is safe to do so.
- 14. The energy storage system is not to be accessed until the O&M Manager or designated Emergency Response Coordinator gives authorization.

### 10.2 Internal Fire

- 1. Call 911 and report the following:
  - Site name: Morrow Lake Solar,





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- The address of the main entrance: Morrow Lake Solar, 3860 Business Interstate 35 E, Pearsall, TX 78061, or nearest site access point,
  - Injuries, if any, and need for an ambulance.
- 2. Make sure the immediate area of the fire is clear of personnel.
- 3. Account for all employees, contractors, and visitors who were working around the fire. If any personnel are unaccounted for from the immediate fire area, a communication shall be made throughout the facility to locate the person(s) missing. If the person(s) is equipped with a facility radio, then an emergency transmission shall be communicated to locate the person(s).
- 4. Contact the O&M Manager (if present) and Emergency Response Coordinator (if not the O&M Manager) immediately.
- 5. Contact the Operations Center and Manager (if present).
- 6. Evacuate the area immediately if the fire warning alarm sounds or fire warning lights illuminate.
- 7. Remove any obstructions (vehicles, material, etc.) that might impede response to the scene.
- 8. Proceed to the designated muster point for headcount.
- 9. If onsite, the designated Emergency Response Coordinator will do a head count and relay any information/instructions.
- 10. If you encounter heavy smoke, stay low and breathe through a handkerchief or other fabric.
- 11. If there is a second means of egress that is clear of smoke, that egress path will be used, and a radio transmission or other type of communication shall be made stating that the clear egress point for other personnel to use for escape is the second means of egress.
- 12. Assist anyone having trouble leaving the area so long as doing so does not put the assister at additional risk.
- 13. The fire suppression system is designed to work in a contained environment. DO NOT open the doors until it has been determined that the agent has been fully released and a predetermined amount of time has passed to ensure no hazards are present, and with the approval of emergency personnel and Subject Matter Expert.
- 14. DO NOT put anyone in harm's way to save the battery equipment in the container.
- 15. Once the fire department arrives, provide them with the following:
  - All applicable SDS documents,
  - Assistance isolating equipment electrically,
  - This emergency action plan,





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- A liaison to remain with the fire department Incident Commander as needed.
- 16. Do not leave the designated muster point until advised to do so. If risk (e.g., smoke) requires evacuation of the muster point, the secondary muster point (designated on the map in Appendix 1) will be used and that fact announced via radio and alarms as available.
- 17. The O&M manager and/or Emergency Response Coordinator (if not the O&M manager) will issue an 'all clear' only when the fire department informs them that it is safe to do so and the site (or portions of it) can be reoccupied or normal working conditions can be resumed.
- 18. The energy storage system is not to be accessed until the O&M Manager or designated Emergency Response Coordinator and the emergency responders give authorization.
- 19. In the event of a fire incident, the designated operations personnel responsible for the safe shutdown of the plant will open switchgear to ensure the grid side of the plant is de-energized and isolate the batteries as best able to (i.e., verify the AC and DC breakers are open in the inverter). The Fire Department needs to understand that some of the equipment (batteries) will remain energized no matter what actions are taken, and the recommended option is containment. Batteries remain energized even if all the contactors, breakers, and switches have been opened.

## 11. Windstorm

### 11.1 Tornado

1. If a tornado is within the immediate vicinity, safe departure from the site is not achievable, and traveling towards the direction of the site, the Emergency Response Coordinator will direct all site personnel to proceed to the tornado shelter and conduct accountability.
2. If an early warning of a tornado is announced by the Federal, State, or County "Emergency Alert System" the emergency coordinator may elect to remove personnel and close the site.

## 12. Staffing

Site staffing remains consistent throughout the year. Impacts on staffing may arise during weather events based on safety concerns. Morrow Lake is operated remotely from LRE's control center. In the event personnel must travel to the site to address equipment outages, the plant





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

manager and O&M provider are contacted. If road conditions are unsafe, personnel are instructed to wait until they can travel safely.

### 13. Biological

#### 13.1 Pandemic

LRE has a COVID-19 response to handle the epidemic/outbreak should it occur. In tandem with following CDC guidelines when it comes to handling isolation and testing, LRE has a COVID-19 policy that is updated when the CDC provides updates. This policy is available upon request.

### 14. Accidental Human Caused

#### 14.1 Equipment Failure

Equipment condition frequently influences the operation and accident history of the vehicle fleet. Scheduled preventive maintenance uncovers problems before failures occur, thereby reducing accidents, breakdowns, and inefficiency.

1. Stock parts and have a method of sourcing them quickly. A well-managed parts inventory enables your repair team to get to work right away, while a strong supplier network ensures you're getting additional parts and equipment fast.
2. Have a training module that details emergency repairs, and delegate roles for support staff following this module. If something goes wrong, everyone will know to respond immediately and accordingly.
3. Investigate insurance policies and warranties for equipment, to understand what you're liable for and what costs you may be able to offset. Staying apprised of these policies also informs good repair decision-making when the time comes.
4. Have changeover capacity on standby if possible. Have a plan for adapting operations to accommodate for the loss of equipment, so your production doesn't come to a complete standstill as fixed costs rise.

#### **Inverter Equipment Failure Action Items Within the First 0-4 Hrs.**

##### **Site OPS:**

1. Remain calm and move to a safe location.
  - Move yourself and others to a safe location to avoid further damage to life and property.
  - Be aware of any risks that the emergency is posing.
  - Keep any others from approaching the scene.
    - Block off any roads with access to the scene.
    - Set perimeter of 1-1/2 times height of structure.
2. Notify the assigned incident commander/senior most responsible LRE person.





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- Incident commander (until replaced)/senior most responsible LRE person will:
  - Determine which departments should be notified and inform personnel as the situation warrants:
    - Regional Director,
    - SLT,
    - Engineering,
    - EHS,
    - Corp Communications,
    - Asset Management,
    - Others as required.
  - Gather accurate information as the situation warrants.
    - Send preliminary report within 1 hour and more information as it becomes available.
    - Determine which components can/should be de-energized:
      - Inverter
      - String
      - Substation
      - Site
- 3. Know where emergency equipment and first aid kits are located.
  - Provide first aid if safe.
    - Determine if others have received injuries that require first aid treatment.
      - Communicate with the victim(s) if situation is safe.
        - Do not jeopardize your life trying to save another person if the situation is unsafe.
      - Incident Commander will direct contact with the appropriate emergency services as the situation warrants:
        - If worker(s) are injured.
        - Scene presents a fire hazard.

### **SLT/HR:**

1. Contact injured workers' families.

### **Site Ops - Once the scene is safe:**

1. Access the scene of the incident.
2. Shut down appropriate equipment.
3. Document your progress.
  - As time allows, note details of the emergency response to the emergency for future use.
4. Follow the directions of law enforcement or other first responders (if involved).





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- Follow their instructions and guidance until the scene is safe and turn back over to LRE.
- 5. All affected personnel shall be informed, that the only statement provided to the media, if asked, is: **"Please give me your contact info and our media person will contact you."**

### **Inverter Equipment Failure Action Items Within the First 4-24 Hrs.**

#### **Asset Mngt/Cam:**

1. Inform the landowner(s).
2. Inform insurance broker Alliant, inform Lenders, and inform Tax Equity providers.
3. Ops:
  - Pull maintenance YTD paperwork,
  - Identify the type of blade/major component/model,
  - Identify, and provide pictures of applicable inspection.
4. Construction:
  - Pull commissioning details/paperwork, sign off on MC, trace torquing of bolts.
5. OT/DA:
  - Pull the fault log of the past 24 hrs.
6. Corporate Comms/Laura:
  - Prepare media statement if required.
7. EHS (if LRE worker is involved) – if a contractor worker is involved their company will:
  - Contact OSHA:
    - i. Within 8-hours if there is a fatality.
    - ii. Within 24-hours if there is a hospitalization overnight.
    - iii. Within 24-hours if there is an amputation.
  - Prepare for OSHA site inspection.
    - i. Pull all applicable documents.

## 15. Intentional Human Caused

### 15.1 Physical Security

1. Morrow Lake has implemented physical security controls to minimize damage and threats to its personnel and equipment. The full plan is available upon request.
  - a. The Physical Security Plan identifies critical plant components to protect from threats and access controls to prevent unauthorized access to those systems.
  - b. The Physical Security Plan contains the following:





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

- i. Identification of Bulk Electric System (BES) assets requiring physical security controls.
- ii. Establish the barriers in place to control unauthorized access.
- iii. Establish controls to limit access to BES assets (least privileged access).
- iv. Establish monitoring controls for access to BES assets.
- v. Establish training for individuals as to their responsibilities regarding unescorted access to protected assets.
- 1. Determine protocols for escorted access.
  - vi. Establish policies for the following:
    - 1. *Revoking, restricting, or adding access.*
    - 2. *Loss of key(s) or key card(s).*
  - vii. Response to a breach of a physical barrier.

## 16. Technological

### 16.1 Hardware/Software Failure

Please see our listed procedure and questions LRE employees ask themselves to prevent technological issues.

- 1. The goal is to be able to restore your data and your infrastructure as quickly as possible if disaster strikes.
- 2. Are you testing your backups regularly?
- 3. Are they being taken offsite and archived?
- 4. There are many different backup options available today including online backups,
- 5. Would your backup recovery plan have potentially gone up in smoke had your building or office caught fire?
- 6. Another key is to have accurate and complete documentation of your infrastructure so that your system can be easily recreated.
- 7. You need to review all your applications and determine how long your business can survive if an interruption were to occur.
- 8. Is your data secure from malicious attacks?





## Procedure: Emergency Operations Plan Sweetwater 4 & 5

9. If your power is disrupted, do you have backup power supplies that will properly protect and shut down your equipment in case of a power outage or protect you from power surges?
10. Take Precautions.
11. Regarding technology and data, take the following precautions:
  - Make sure you have a good backup of your data and take it to a safe and secure place. This can be accomplished in one of several ways:
  - If you have a good tape backup solution, take ALL your tapes off-site to a secure, high, and dry location.
  - If you do not have a tape backup or are in a flood-prone area, take your server with you.
  - Worst case, clearly mark the hard drives in your equipment, remove them, and take them with you if rising or blowing water is a threat.
  - If you do not need 24x7 access to your systems, power them down; do not leave equipment running.
  - Gather all critical equipment and move it away from windows and the threat of rising water.
  - Print off important lists such as employee and customer lists.
  - Print off emergency contact numbers for vendors.
12. If you are closing your offices, perform the following steps:
  - Employees should unplug the power cables to their computers and electronic devices from the wall outlets after they shut down their computers.
  - If a server is being used as a fax server, make sure that all phone lines are unplugged. (Unless the Surge protector is protecting the phone line).
  - All copiers should also be unplugged from the wall outlets.

**Note:** If a piece of hardware/software fails that impacts the security controls and in turn the security procedures of the Facility, please contact the Sr. Director of Regulatory Compliance as this may constitute a CIP Exceptional Circumstance.

### 16.2 Utility interruption/failure

1. Remain calm.
2. If you are in an unlighted area, proceed cautiously to an area that has lighting.
3. Aid others in your area who may be unfamiliar with the space.
4. If instructed to evacuate, proceed cautiously to the nearest exit.







## Procedure: Emergency Operations Plan Sweetwater 4 & 5

### 16.3 Cyber Security

Our headquarters is the home of our Operations Control Center, responsible for maintaining and monitoring all our field assets. These assets are considered BES controlled by qualified personnel and Bulk Electrical Cybersecurity Assets. This environment adheres to NERC-based regulatory compliance. Access to this area and its systems is granted only to authorized personnel. Employees of the Technical Service Group (composed of Operations Technology and Information Technology) are assumed to have access to this space. Exceptions are made on a case-by-case basis under the direction of the ISMC and are governed by LRE's Director of Compliance. Auditing is performed on a quarterly cadence.

Site offices and Operations and Maintenance buildings are governed uniquely by plant managers, and house our BES, which have an added layer of governance applied to them. For more information regarding site governance and safety, please contact our Director of Compliance and/or Director of Environmental Health and Safety. Report all malicious, suspicious, or concerning activity directly to the plant managers and/or HR. Do not engage with suspicious persons or scenarios directly, as your safety is our greatest concern. LRE's full cyber security policy/plan is available upon request






Procedure: Emergency Operations Plan  
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**Acknowledgment**

By signing this acknowledgment, I confirm my understanding of my required actions described within this emergency operations plan for the protection of myself, plant equipment, and grid reliability.

Name: Jesse Monroe  
Title: Plant Manager  
Date: July 11, 2024 | 11:44 AM CDT

DocuSigned by:

  
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