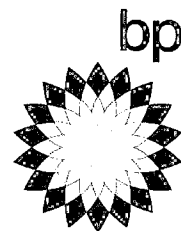




## Filing Receipt

**Received - 2022-04-18 11:11:53 AM**  
**Control Number - 53385**  
**ItemNumber - 269**



April 18, 2022

Filing Clerk, Central Records Division  
Public Utility Commission of Texas  
1701 N. Congress Avenue, 8-100  
Austin, TX 78711-3326

Submitted via Email, [CentralRecords@puc.texas.gov](mailto:CentralRecords@puc.texas.gov)

Dear Filing Clerk:

Re: Emergency Operations Plan (EOP)

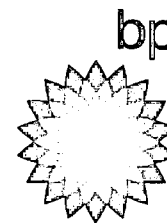
Pursuant to Public Utility Commission of Texas (PUC) Substantive Rules Chapter 25, Subchapter C: Infrastructure and Reliability, Section 25.53, Electric Service Emergency Operations Plans attached please find the above-referenced joint EOP for Texas Retail Energy Providers (REPs):

1. BP Energy Company, Texas License # EL020004, ID Number: 10038
2. BP Energy Retail, Texas License # RE210009, ID Number: 10294

Please don't hesitate to call me if you have any questions.

Sincerely,

Judy Briscoe  
Regulatory Affairs Advisor  
[judy.briscoe@bp.com](mailto:judy.briscoe@bp.com)



## **Emergency Operations Plan (EOP)**

As required by

Texas Public Utilities Commission (PUCT) Chapter 25, Subchapter C, Section 25.53

For

BP Energy Company (BPEC)

BP Energy Retail LLC (BPER)

Version 1.0

As of April 14, 2022

## Table of Contents

- I. Executive Summary
  - a. Contents and Policies
  - b. Reference to Specific Sections that Correspond to the Requirements
  - c. Affidavit
- II. Approval and Implementation
  - a. Record of Distribution
  - b. Emergency Contacts
  - c. Revision Control Summary
- III. Communication Plan
- IV. Maintaining Supplies
- V. Staffing During Emergency Response
- VI. Identification of weather-related hazards
- VII. Training/Drills
- VIII. Annexes
  - a. Pandemic and Epidemic Plan
  - b. Hurricane Plan
  - c. Cyber Security Plan
  - d. Physical Security Plan

I. EXECUTIVE SUMMARY

BP Energy Company ("BPEC") and BP Energy Retail LLC ("BPER") are wholly owned subsidiaries of BP Company North America ("BP") and licensed in the State of Texas as Retail Energy Providers (REPs).

BP is filing a single, joint EOP for both BPEC and BPER, as the staffing, procedures and policies are identical for each REP.

Additionally, BPER is an affiliate of BPEC, which has a full staff supporting Power. The same staff, procedures and controls are leveraged for BPER activity within Texas.

At this time, BPEC and BPER are licensed as Option 1 REPs. However, both function as Option 2 REPs, as they have no unaffiliated third-party retail customers. That is, at this time the only retail customers both entities serve are BP-affiliate commercial load. Additionally, BPEC and BPER do not own any transmission, distribution or generation facilities.

The purpose of this Emergency Operations Plan ("Plan") is to ensure a stable, reliable, and robust operating environment protected from operational disruptions caused by natural or manmade Hazards and/or Threats and related Emergencies.

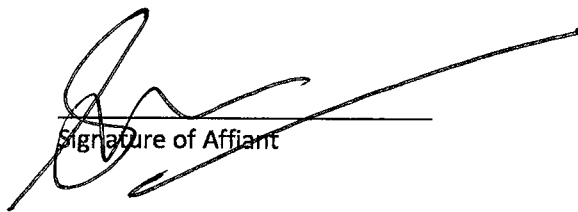
Item		
Description of Contents and Policies	C.1.A.i.I	Page 3
Reference to specific sections in 25.53	C.1.A.i.II	Page 4
Record of Distribution	C.1.A.i.III	Page 6
Affidavit	C.1.A.i.IV	Page 5
Emergency Contacts	C.4.B.i.IV	Page 6
Approval and Implementation Section	D.1.	Page 6
Revision Control and History	D.1.	Page 7
Communication Plan	D.2.C.	Page 7
Maintaining Supplies	D.3.	Page 8
Staffing During Emergency Response	D.4.	Page 8
Identification of Weather Related Hazards	D.5.	Page 8
Training and Drills	F.	Page 8-9
Pandemic and Epidemic Annex	E.3.A.	Page 10
Hurricane Annex	E.3.B.	Page 11
Cyber Security Annex	E.3.C.	Page 12
Physical Security Annex	E.3.D.	Page 13

State of Texas §

County of Harris §

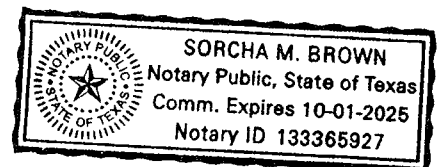
Before me, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, states as follows on behalf of BP Energy Company ["BPEC"] and BP Energy Retail, LLC ["BPER"]:

1. My name Sri Rangan. I am the Vice President of Gas & Power Operations for BP Gas & Power Trading Americas;
2. All 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;
3. The EOP has been reviewed and approved by the appropriate executives;
4. Drills that test this EOP have been, or will be, conducted to the extent required by Commission rules;
5. The EOP or an appropriate summary shall be distributed to local jurisdictions, as needed;
6. Both BPEC and BPER maintain a business continuity plan that addresses returning to normal operations after disruptions caused by an incident;
7. Both BPEC and BPER have emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received, or will receive, the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
8. I further swear and affirm that all statements and representations made in this report are true and correct to the best of my knowledge.

  
Signature of Affiant

Sworn and subscribed before me this 14 day of April 2022





## II. APPROVAL AND IMPLEMENTATION

### 1) Distribution & Responsible Personnel

The following individual(s) have the following responsibilities in maintaining and implementing the EOP for both BPEC and BPER, as well as amending the EOP:

The following is the Record of Distribution (i.e., persons receiving access to and/or training on the EOP):

Name	Title	Date of Access or Receiving Training
Edgar Castro	VP Americas Power Trading & Origination	April 14, 2022
Edward Pinkerton	President BP Energy Retail	April 14, 2022
Sri Rangan	Vice President Gas & Power Trading Americas	April 14, 2022
Chris Cuneo	Senior Manager Power Operations	April 14, 2022
Fernando Gutierrez	Senior Manager ISO Coordination	April 14, 2022
Dean Ellis	Sr. Advisor Power-Regulatory Affairs	April 14, 2022
Judy Briscoe	Advisor - Regulatory Affairs	April 14, 2022
Michelle Almazan	Retail Operations Coordinator	April 14, 2022

The following is a list of emergency contacts:

Name	Title	Email Address	Phone Number
Chris Cuneo	Senior Manager Power Operations	<a href="mailto:christopher.cuneo@bp.com">christopher.cuneo@bp.com</a>	713-323-4264
Real-Time Desk	24 Hour Desk	<a href="mailto:RealTimeOperations@bp.com">RealTimeOperations@bp.com</a>	713-323-6044
Dean Ellis	Sr. Advisor Power-Regulatory Affairs	<a href="mailto:dean.ellis@bp.com">dean.ellis@bp.com</a>	713-323-3589
Fernando Gutierrez	Senior Manager ISO Coordination	<a href="mailto:fernando.gutierrez@bp.com">fernando.gutierrez@bp.com</a>	281-800-1759
Judy Briscoe	Advisor - Regulatory Affairs	<a href="mailto:judy.briscoe@bp.com">judy.briscoe@bp.com</a>	346-278-3075
Michelle Almazan	Retail Operations Coordinator	<a href="mailto:michelle.almazan@bp.com">michelle.almazan@bp.com</a>	832-619-5106



## 2) EOP Version and Control and History

This EOP version 1.0 is the first version of EOP and was approved as of April 14, 2022.

There have been no changes to this version of the EOP since it was implemented. Future modifications to the EOP will be documented in this section.

The following is a list of individuals responsible for maintaining and implementing the EOP. Any of these individuals may revise the EOP.

Name	Title
Fernando Gutierrez	Senior Manager ISO Coordination
Dean Ellis	Sr. Advisor Power-Regulatory Affairs
Judy Briscoe	Advisor - Regulatory Affairs
Michelle Almazan	Retail Operations Coordinator

## III. COMMUNICATION PLAN

BPEC and BPER will handle potentially affected stakeholders and its own operations in the event of an emergency as follows below. BPEC and BPER may modify its approach depending on the specific facts, circumstances, and needs of the situation with the most updated information available and accessible.

*Public* – BPEC and BPER will accommodate public communications through its digital/social presence and telecommunication capabilities.

*Media* – The media can contact BPEC and/or BPER through its website, social media pages, and business phone number. These capabilities are all internet-based. All inquiries will be referred to BP's communications and external affairs team.

*Customers* – BPEC and BPER will handle customer communications through its digital/social presence, email, and telecommunication capabilities. These capabilities are all internet-based.

*Commission/OPUC* – The commission/OPUC can communicate with BPEC and/or BPER personnel through readily available email, internet-based video/conference calls, and phone numbers. These capabilities are all internet-based.

*Complaint Handling* –BPEC and/or BPER operates its customer care center through readily available email, internet-based video/conference calls, and phone numbers and can maintain all complaints handling via work-from-home, if required. Both BPEC and BPER customer information are all managed via a cloud-based information platform that supports remote access, if required.

#### IV. EMERGENCY RESPONSE SUPPLIES

The facility provider for BPEC and BPER maintain a first aid equipment kit to assist in the event of a local medical emergency.

#### V. STAFFING DURING EMERGENCIES

BPEC currently maintains a disaster recovery location at a back-up location that is geographically-separate from the primary location and where all QSE activities can be maintained and monitored on a 24x7 basis. The back-up location is maintained to ensure functionality and redundancy. BPEC utilizes an internal Business Continuity Plan group (BCP) comprised of senior level staff who will initiate the mobilization of business personnel and activities when a situation arises that could render the primary location inoperable.

In the event it becomes necessary to move BPEC from the primary to the back-up location, a representative from BPEC will notify ERCOT. BPEC and BPER personnel will then be deployed to the back-up location where all ERCOT QSE and LSE responsibilities will be managed.

BPEC is required to submit its Back-Up Control Plan to ERCOT on an annual basis as required by *ERCOT Operating Guides Section 3.2.1 (2)*.

#### VI. IDENTIFICATION OF WEATHER-RELATED HAZARDS

BP's BCP plan provides basic business continuity (BC) guidance applicable to all Trading & Shipping (T&S) teams, supporting functions and related co-located teams. Notifications of an incident (including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, flooding, etc.) that could impact the business continuity may come from building, facility or local public emergency notification systems, line manager or business leadership, or from the automated BP Alert notification system.

#### VII. TRAINING/DRILLS

BPEC performed a test of the back-up location functionality by deploying the critical BCP staff and running operations from the geographically separate BCP facility on July 18, 2019. All functions and responsibilities BPEC performs in the ERCOT market were tested and verified. Due to the COVID-19 pandemic, all BP staff were working from home for the majority of 2020 into 2022. The 2022 BCP exercise is scheduled for mid-May 2022.

24/7 BP Realtime personnel have been assigned to either a primary or secondary role when the staff is deployed to the back-up location. The primary roles are required to travel to the back-up location to perform all ERCOT duties and have participated in the testing during a yearly practice run. The secondary roles remain in the primary location as the transition team when the event has ended, and the primary personnel are returning from BCP back-up location. Secondary roles have also previously visited the back-up location for training.

In the event of a pandemic outbreak or health event in which personal contact needs to be restricted to reduce potential human-to-human transmission, and the health and wellbeing of personnel are impacted, BP may close the primary location and instruct personnel to work remotely from home. This event may also prohibit BPEC and BPER personnel from traveling and working from the BCP locations, in which case the following exceptional circumstance procedures will apply:

- BPEC will notify ERCOT Operations Desk via phone and email that all personnel will be working remotely from home until further notice.
- ERCOT will need to deactivate the OPX-Hotline temporarily, until BPEC personnel can return to work to the primary or BCP back-up locations.
- BPEC will continuously maintain the 24/7 Realtime phone line 713-323-6044, for all ERCOT communications.
- BPEC & BPER will continue to manage and perform all operational functions from remote locations.

The T&S BCP is reviewed annually by the Global Power Trading America's Crisis & Continuity Management and approved by the T&S Regional Health, Safety, Security, and Environmental management. The BPEC Back-Up Control Plan is reviewed annually by the Operations Manager and approved by the VP Gas & Power Operations.

## ANNEX A: PANDEMIC AND EPIDEMIC PLAN

In the event of a pandemic outbreak or health event in which personal contact needs to be restricted in an effort to reduce potential human-to-human transmission, and the health and wellbeing of personnel are impacted, BPEC may close its primary location and instruct personnel to work remotely from home. This event may also prohibit BPEC personnel from traveling and working from the BCP back-up locations, in which case the following exceptional circumstance procedures will apply:

- BPEC will notify ERCOT Operations Desk via phone and email that all personnel will be working remotely from home until further notice.
- ERCOT will need to deactivate the OPX-Hotline temporarily, until BPEC personnel can return to work to the primary location or BCP back-up locations.
- BPEC will continuously maintain the 24/7 Realtime phone line 713-323-6044, for all ERCOT communications.

BPEC will continue to manage and perform all operational functions from remote locations. BPER is an affiliate of BPEC which has a full staff supporting Power. The same staff procedures and controls will be leveraged for BPER activity within Texas.

## **ANNEX B: HURRICANE PLAN**

BP maintains detailed emergency procedures for all locations. These emergency procedures cover:

- Employee responsibilities

- Medical emergency procedures

- Fire procedures

- Occupational Injury and Illness Procedures

- Evacuation Maps

- Severe Weather and Power Outage Procedures, including tornado and hurricane procedures

- Hazardous Materials procedures

- Security incidents and bomb threat procedures

- Workplace violence procedures

- After-hour procedures

A copy of the current BP emergency procedures for its locations are available upon request.

## ANNEX C: CYBERSECURITY PLAN

BP maintains a suite of detailed cybersecurity policies and procedures. The purpose is to protect BP people and assets from cyber threat and make BP a cyber resilient organization.

The base BP Policy, Manage IT Security ("the Policy"), defines the IT Security requirements for the protection of BP's digital systems. The Policy details BP's minimum IT security controls required. The Policy was prepared by the SVP Digital Security and issued with the authority of the EVP Innovation and Engineering. The policy is supported by further technical standards and additional guidance and is not to be considered an exhaustive list of security requirements.

More information on BP's cybersecurity policies are available upon request.

## **ANNEX D: PHYSICAL SECURITY INCIDENT PLAN**

BP maintains detailed emergency procedures for all locations. These emergency procedures cover:

- Employee responsibilities

- Medical emergency procedures

- Fire procedures

- Occupational Injury and Illness Procedures

- Evacuation Maps

- Severe Weather and Power Outage Procedures, including tornado and hurricane procedures

- Hazardous Materials procedures

- Security incidents and bomb threat procedures

- Workplace violence procedures

- After-hour procedures

A copy of the current BP emergency procedures for its locations are available upon request.