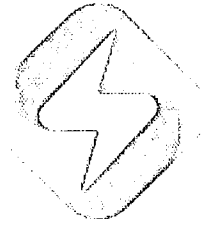




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BEC
POWER

§25.53 EMERGENCY OPERATIONS PLAN

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Definitions

- **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.
- **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.
- **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.
- **Public Utility Commission of Texas (Commission) (PUCT):** The Public Utility Commission of Texas regulates the state's electric, telecommunication, and water and sewer utilities, implements respective legislation, and offers customer assistance in resolving consumer complaints.
- **Office of the Public Utility Commission (OPUC):** The Office of Public Utility Counsel (OPUC) was created by the Texas Legislature in 1983 to represent the interests of residential and small commercial consumers, as a class, in utility proceedings in Texas. Pursuant to its current statutory mission, OPUC represents residential and small commercial consumers, as a class, in the electric, water, wastewater, and telecommunications utility industries in Texas. OPUC primarily represents these consumers before the Public Utility Commission of Texas (PUCT), State Office of Administrative Hearings (SOAH), state courts and Electric Reliability Council of Texas (ERCOT).
- **Texas Department of Emergency Management (TDEM):** The Texas Division of Emergency 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. TDEM implements programs to increase public awareness about threats and hazards, coordinates emergency planning, provides an extensive array of specialized training for emergency responders and local officials, and administers disaster recovery and hazard mitigation programs in the State of Texas.

Note: Other relevant terms are defined in EOP Sections and Annexes.

Safety

The BEC Safety Program / Safety Manual always remains in effect. During any type or level of emergency the policies, procedures, and information contained in the Safety Manual is to be adhered to by all BEC personnel, with no exceptions.

In a major event, BEC may augment BEC safety personnel with TEC safety coordinators. TEC provides this service which includes:

- Assigning TEC Safety Coordinator to each contractor that is assisting with restoration.
- Ensuring all crews and personnel follow safety procedures and policies.
- Ensuring focus and ongoing communications regarding safety rules, procedures, and strategies, during all phases of restoration efforts.

Mutual Aid

BEC shall work with TEC, Brazos Electric Cooperative (BRAZOS EC) and individual Cooperatives, regional utilities, and qualified contractors to provide appropriate resources in an event of a scale that requires outside resources, equipment, and personnel.

- If BEC determines the need for outside assistance, the Incident Commander shall coordinate with the BEC General Manager/CEO (or General Manager/CEO's Designee) to make any formal requests of outside assistance.
- BEC is a member of the Texas Electric Cooperatives (TEC) statewide association and shall coordinate and communicate with TEC if an emergency event or situation requires TEC assistance.
- The general procedure for securing emergency assistance / outside restoration resources is as follows:
 - Survey the extent of damage and determine as soon as possible to assess the outside resources requirement in terms of personnel and equipment.
 - Consult this manual for information on other Cooperatives, utility systems, and contractors to determine available manpower, equipment, tools, and overall ability to provide resources.
 - Arrange and coordinate directly with resources identified above and alert the statewide TEC office (512) 454-0311.
 - Prepare and execute Major Outage Restoration Contracts. Get Certificate of Insurance from Contractors.



\$25.53 EMERGENCY OPERATIONS PLAN SECTIONS

(Section-1) Approval and Implementation Section

1.0 Plan Revisions / Approval(s)

This version of the Bartlett Electric Cooperative Emergency Operations Plan (EOP) was developed to comply with the updated Texas Administrative Code (TAC) 16 §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. The updated TAC 16 §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide the Cooperative with a clear set of guidelines, policies, and procedures intended to guide preparations, responses, and actions related to all phases and types of electric system emergencies.

This Plan is a living document and shall be reviewed and updated on a regular basis. The Chief Operations Officer is responsible for coordinating these systematic updates.

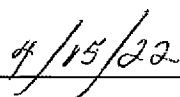
* Note – Each approved / active version of the Plan remains in effect until replaced / superseded by an updated and approved version.

PLAN APPROVAL / VERSION

| Date | Version | Description |
|-------------|----------------|--|
| 2022.04.15 | 1 | Initial EOP Pursuant to 16 TAC §25.53 All previous version of Bartlett EC EOP are superseded. |



Bryan Lightfoot
General Manager
Bartlett Electric Cooperative, Inc.



Date

Individual(s) Responsible for Plan Administration

The individual(s) listed in the table below are responsible for maintaining and implementing the Plan and have authority to change the Plan:

| Name | Title | Responsibility | Authority to Change |
|-----------------|--------------------------|---|----------------------------|
| Bryan Lightfoot | General Manager | Must review and approve all changes to the EOP. | Yes |
| Daniel Sanders | Chief Operations Officer | Plan Administrator. Must review and approve all changes to the EOP. | Yes |

Change History Log: The change history below reflects changes to the EOP Document:

Description of Prominent Changes

Date

1.1 Introduction and Applicability

1.1.1 Message from the General Manager

To: All BEC Employees

We have an obligation to our members to prepare and train to restore power in the most extreme circumstances. The communities we serve rely on us to provide timely and accurate information during these extreme conditions.

Operating safely is the highest priority at all times. There is no condition where it is appropriate to operate outside of the guidelines of our safety manual and industry best practices.

To effectively execute power restoration efforts and quickly disperse accurate information, we have developed an Emergency Operation Plan. This document is to act as a resource to help provide structure to our entire cooperative during emergency situations. I am asking each of you to take ownership of the success of this plan by thinking critically about your involvement in the cooperative's response to emergency situations.

I am proud of the team that we have assembled. I know each department has a role to play during emergency situations and will execute their responsibilities at the highest level.

Thank you for your involvement in the execution of this emergency operation plan and the commitment to serving our members.

Sincerely,

Bryan Lightfoot
General Manager
Bartlett Electric Cooperative, Inc.

1.1.2 Purpose / Goals

The purpose of the Emergency Operations Plan is to provide Bartlett Electric Cooperative (BEC) with the information, policies, and procedures needed to prepare for and effectively manage a system emergency event or situation.

This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (16 TAC §25.53) and is intended to guide the organization in the preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

BEC maintains an Emergency Operations Plan in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- **Provide the structure, policies, and procedures to guide the organization** during all types of emergency conditions and situations.
- **Enable BEC, other utility and governmental entities, members, and stakeholders to coordinate and communicate effectively** during emergency situations and events.
- **Establish procedures for the restoration of electrical service in a systematic and efficient manner** by effectively utilizing BEC's human and physical resources and if necessary, by securing and utilizing outside resources.
- **Ensure that BEC maintains compliance with the regulatory requirements** related to emergency operations and emergency response.

The plan is organized into the following sections:

- **Section**
 - (Section-1) Approval and Implementation Section
 - (Section-2) Communications Plan
 - (Section-3) Pre-Identified Supplies for Emergency Response Plan
 - (Section-4) Staffing During Emergency Response Plan
 - (Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure
- **Annexes**
 - Weather Emergency Annex
 - Load Shed Annex
 - Pandemic and Epidemic Annex
 - Wildfire Annex
 - Hurricane Annex
 - Cyber Security Annex
 - Physical Security Incident Annex

1.1.3 Applicability

The policies, procedure, and tasks contained in the Emergency Operations Plan (EOP), apply to all types of emergency events and situation that impact the BEC electric system, including the system facilities and operations.

The EOP is the document that guides the organization in the preparation phase, during system emergency events, and in the restoration and recovery phase of an event.

The Plan Administrator will ensure that each area of the Cooperative has input to the development of the EOP and has the required training and exposure to the EOP and has overall responsibility for the implementation of the plan.

1.1.4 Internal Training / Annual Drill

BEC is committed to EOP training for BEC personnel. Training shall be conducted on a regular basis and include the appropriate materials for various departments and areas of the organization.

- BEC shall review the EOP with all employees on an annual basis.
 - The training / review sessions for Operations personnel shall include a “table-top” exercise and a review of the current plan. The session shall likely be conducted in conjunction with a monthly safety meeting.
 - Following the annual training, BEC shall assess the effectiveness of the drill and modify its EOP as needed.
- The Chief Operations Officer shall coordinate with all BEC managers and supervisors to determine the most effective manner to conduct a review with other BEC departments.
- Regional governmental agencies / entities in the BEC service area conduct emergency exercises on a regular (annual) basis. When possible, BEC shall participate in these exercises and coordinate with area entities on planning for emergency events.
- BEC shall conduct a “debriefing” after each operational use of the EOP. These sessions include a review of the event and identify the successful aspects of the EOP as well as areas that may be improved or added.

1.2 Plan Maintenance and Plan Responsibilities

The Chief Operations Officer is the EOP Administrator for the BEC EOP. The EOP Administrator is central to the administration and implementation of the BEC EOP.

The responsibilities of this role / position include the following administrative duties and actions:

- Coordinate the systematic updates to the EOP as regulations change and evolve, as best practices and “lessons learned” from actual events and other utilities become available and as personnel and organizational changes occur at BEC.
- Prepare a letter for personnel to present to authorities to return to BEC service for storm restoration efforts and provide a copy of the BEC employee list to government agencies, Texas Department of Public Safety, county sheriff agencies, and city police departments.
- Ensure the tasks identified in the EOP are completed and tracked.

The EOP Plan Administrator has multiple responsibilities related to maintenance, accuracy, training, and overall effectiveness of the plan. Plan administration responsibilities are provided in this section.

- Ensure that the Emergency Operations Plan meets all requirements of PUC 16 TAC §25.53.
- Track changes to the EOP and determine if the changes are significant and warrant the filing of a new version of the Plan with PUC, no later than 30-days after the change takes effect.
- Conduct a formal review of the EOP each year. This review shall occur prior to the annual table-top exercise, or as needed.
- Ensure that the emergency contact information is maintained and reported to the PUC as required. Any change(s) to the emergency contact information shall be updated at the PUC within 30-days of the change.
- Maintain a copy of the current EOP and make this available to PUC staff upon request.
- Work with the Member Services Supervisor:
 - Develop a process to identify and maintain the information on Critical Load accounts. The registry shall be maintained in BEC’s Customer Information System (CIS) / Mapping systems.
 - Ensure that the Member Services Supervisor reviews the EOP Communications Plan each calendar year (at a minimum) and makes updates, edits or changes to the plan as needed.
 - Conduct a review of the Pandemic and Epidemic Annex each year. This review shall occur prior to the annual table-top exercise, or as needed.
- The EOP Administrator shall:
 - Conduct a review of the Load Shed Annex each year. This review shall occur prior to the annual table-top exercise, or as needed.
 - Conduct a review of the Restoration Plan each year. This review shall occur prior to the annual table-top exercise, or as needed.
 - Conduct a review of the Wildfire Annex each year. This review shall occur prior to the annual table-top exercise, or as needed.

- Conduct a review of the Weather-Related Hazards Identification Plan and EOP Activation Procedure and the Weather Emergency Annex each year. This review shall occur prior to the annual table-top exercise, or as needed.
- Conduct a review of the Pre-Identified Supplies for Emergency Response Plan each year. This review shall occur prior to the annual table-top exercise, or as needed.
- Conduct a review of the Staffing During Emergency Response Plan each year. This review shall occur prior to the annual table-top exercise, or as needed.
- Review all National Incident Management System (NIMS) training completed for active BEC personnel.
- Review the Physical Security Annex.
- The EOP Administrator shall work with the Director of IT:
 - Review the Cyber Security Annex.

1.2 Emergency Operations Center

The purpose of this section is to provide guidelines and procedures for the activation of an Emergency Operations Center (EOC) for any declared emergency.

- The EOC is located in the Conference Room in the Arnold B. Oliver Service Center.
- The back-up location is the Administration Building Board Room.
- The Chief Operations Officer is the EOC Manager.
- The EOC constantly monitors the status of the BEC system and weather activity that may affect the electrical delivery system. The EOC monitors the activation and initiates the reallocation of ON-CALL and STAND-BY resources as needed and advises the Construction/Services Managers of conditions that may warrant an emergency level change. The EOC initiates level changes as warranted. The EOC ensures all systems are operating.
- The EOC, depending on the severity of the occurrence, may rotate on 6am-6pm and 6pm-6am shifts.
- EOC Manager responsibilities include:
 - Assure shift turnover is complete
 - Assure Major Reports are e-mailed
 - After reduction in level to Level 1, Data Clean up and Storm Report must be e-mailed within an hour.
 - Maintain restoration chart.
 - Update Outage Management System (OMS) Messages and Estimated Time of Restoration (ETOR) (as conditions warrant).
 - Initiate contractor stand-by conversation with Crew Superintendents.
- Initiate Customer contact for prolonged outages.
- **Staffing:** The EOC will be staffed on a 24-hour basis or as determined by the EOC Manager to meet the needs of the Cooperative. Staffing may include but is not limited to representatives from the following departments: Engineering, Human Resources, IT support personnel.
- **Equipment:** The IT Supervisor will arrange for the following equipment: four laptops with UC, IVUE, Internet access and e-mail. The Director, IT will verify that the satellite feed (Dish Network TV) is working. The IT Supervisor will set up sufficient telephones and handheld radios to handle all emergency communication needs for the EOC.

(Section-2) Communications Plan

2.0 Purpose and Applicability

To provide the communication guidelines, policies, procedures, and pre-developed content that BEC shall utilize in all types and levels of emergency events.

2.1 Administration / Initial Tasks

Develop / Implement Emergency Operations Communications Plan (EOCP): BEC shall develop and maintain a communications plan to guide BEC during emergency events, including significant service outages.

The EOCP contemplates all types of system emergencies and provide the guidelines, policies, procedures, and pre-developed content that BEC shall utilize to communicate with all external audiences and stakeholders. Additionally, the EOCP shall address BEC's telephone system and member complaint handling procedures during an emergency event. The EOCP is summarized in this section of the EOP.

2.2 Annual Review / Ongoing Maintenance

The EOCP shall be reviewed annually (or as needed) by the EOP Administrator to ensure that the information is current. The EOCP shall be maintained by the EOP Administrator.

2.3 Content of BEC Communications Plan

The BEC Communications Plan includes the following information regarding the strategies, policies, and procedures during a system emergency, including:

2.3.1 Emergency Event Communication Strategies

Key strategic elements of the plan are based on industry best practices and lessons learned from recent emergency events. Key Emergency Event Communication strategies are listed below:

- **Readiness and Activation:** BEC EOP Administrator, Managers, Supervisors, and key staff will monitor potential emergency situations and conditions and activate appropriate levels of internal and external communication procedures.
- **Open and Timely Communication:** BEC EOP Administrator, Managers, Supervisors, and key staff will share all relevant information regarding the preparation, operations, restorations and other relevant information with internal and external audiences and stakeholders in a timely manner.
- **Engagement and Communication with Relevant Agencies and Entities:** BEC EOP Administrator will work closely and coordinate with local, regional, and State agencies and entities to ensure effective communications regarding outage and restoration conditions, status, and plans.
- **Ongoing and Effective Training:** BEC has developed and shall implement a comprehensive Emergency Operations Plan training program for all BEC personnel. This training can be customized to the various BEC departments to ensure key EOP information is conveyed to the respective groups.
- **Emergency Operations Center (EOC) and Channels:** BEC will establish an EOC to ensure event status and operational communications across all relevant BEC departments and teams.

2.3.2 Emergency Event Communication Policies

- **Development and Maintenance of Emergency Operations Communication Plan:** BEC shall develop and maintain a plan that contains communication guidelines, policies, procedures, and pre-developed content that BEC shall utilize in all types and levels of emergency events.
- **Tracking and Coordination of External Communications:** During any declared emergency, the IT Supervisor will be responsible for the coordination and tracking of all BEC external communications. IT Supervisor will coordinate closely with BEC General Manager/CEO to ensure all external press/media releases, interviews and associated communications contain accurate and updated information.
- **Primary Spokesperson(s):** The BEC General Manager/CEO (and Designee) will direct and serve as the primary spokesperson(s) for the cooperative. The General Manager/CEO (and Designee) may delegate / designate other senior BEC to prepare communications and / or make statements to BEC's members, the public, the media (including social media).
- **BEC Employee Communications with Media / External Communications:** Any BEC employee contacted by the media should refer the contact to the Member Services Supervisor (and designees). Unless a BEC employee has been given specific authority to disclose information to the media, and/or present the company's official position, comment should not be provided. Any BEC employee pressed by the media for information should be polite, but firm in their referral to the IT Supervisor.
- **Pre-Developed Communications Pre-Scripted Content and Templates:** BEC IT Manager shall develop pre-scripted templates for news releases, social media posts and other media communications.

2.3.3 Handling Member Complaints and Contacts:

The procedures for addressing complaints, concerns, and inquiries from BEC's members is as follows:

- BEC shall make every effort to receive / answer all calls from members including members registering complaints, concerns, and asking questions regarding the emergency event and related information and updates regarding BEC's restoration efforts and status.

2.3.4 Communicating with the Public:

- BEC will coordinate with the Chief Operations Officer to provide official updates on BEC's power restoration process and post this information on the BEC website. These official status reports / updates will be posted daily or more frequently if possible.

2.3.5 Communicating with the Media:

- If possible, BEC will notify local media and membership of preparations taken by BEC to prepare for the event.
- In the time period prior to a likely event, the IT Supervisor will assemble and review materials and brief staff / managers regarding basic procedures and the types of messaging that could be provided during a pending event via standard and / or social media platforms.
- Periodic updates will be provided to local and major media outlets in and around the BEC service areas throughout the event. All local media outlets will be notified of new developments in their areas as they occur.
- Major media outlets will be provided daily updates on BEC's power restoration process.

- BEC will provide area / regional newspapers and radio stations with restoration status updates and promote safety messages, and encourage use of outage hotline, outage map etc.
- BEC will coordinate with the Chief Operations Officer to provide official updates on BEC's power restoration process and post this information on the BEC website. These official status reports / updates will be posted daily or more frequently if possible.

2.3.6 Communicating with Members:

- BEC shall designate personnel that are responsible for member communications (that will be coordinated with media communications).
- BEC will coordinate with the Chief Operations Officer to provide official updates on BEC's power restoration process and post this information on the BEC website. These official status reports / updates will be posted daily or more frequently if possible.
- The BEC Outage Map will be maintained in real-time based on the system's configuration and capabilities. BEC will provide additional status information in the same section of the BEC website to inform members (and media) of any additional restoration information.

2.3.7 Communicating with the PUCT:

- Upon request by PUCT staff during an activation of the State Operations Center (SOC) by the Texas Department of Emergency Management (TDEM), the Cooperative will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by PUCT staff.
- Chief Operations Officer will provide official updates on BEC's power restoration process and post this information on the BEC website. These official status reports / updates will be posted daily or more frequently if possible. BEC will inform the PUCT of this information source if requested.
- BEC has provided PUCT with BEC's contact information and will respond directly to any communications and requests from PUCT and / or OPUC.

2.3.8 Communicating with the Office of Public Utility Counsel (OPUC):

- Upon request by OPUC during an activation of the SOC by the TDEM, the Cooperative will provide updates on the status of operations, outages, and restoration efforts. Updates shall continue until all event-related outages are restored or unless otherwise notified by OPUC. JEC will maintain open channels of communication with PUCT and OPUC.
- BEC will maintain open channels of communication with PUCT and OPUC.
- BEC has provided PUCT with BEC's contact information and will respond directly to any communications and requests from PUCT and / or OPUC.

2.3.9 Communicating with Local and State Governmental Entities, Officials, and (County) Emergency Operations Centers:

- BEC EOP Administrator will work closely and coordinate with local, regional, and State agencies and entities to ensure effective communications regarding outage and restoration conditions, status, and plans.
- BEC General Manager/CEO, Chief Operations Officer, or designees, will actively participate and coordinate with the following entities and groups:

- Regional / County Emergency Managers;
- State and local government agencies, including Texas Department of Emergency Management (TDEM), the Texas Public Utility Commission (PUCT), Brazos Electric Cooperative (BRAZOS EC); and regional utilities.
- As appropriate, coordinated communications will be developed and distributed in conjunction with these entities.
- BEC General Manager/CEO, Chief Operations Officer, or designees will coordinate communications with regional emergency coordinators by participating in calls and meetings (in-person and/or virtual).

2.3.10 ERCOT:

- BEC will maintain open channels of communication with BEC's ERCOT Designated Transmission Operator, BRAZOS EC, which is the entity that will communicate with ERCOT regarding any Firm Load Shed status.
- BEC has provided ERCOT with BEC's contact information and will respond to any and all communications and requests from ERCOT and / or BRAZOS EC.

2.3.11 Critical Load Customers:

- BEC will call, text or email Critical Load Members to provide relevant information.

2.3.12 Internal Communications:

- The IT Supervisor will keep BEC personnel informed of media communications.
- Coordinate internal communications with Chief Operations Officer and General Manager/CEO during the entire period of any / all emergency restoration situations.

(Section-3) Pre-Identified Supplies for Emergency Response Plan

3.0 Purpose and Applicability

To provide guidelines for the management of materials, supplies and resources that BEC may need during emergency events.

3.1 Administration / Initial Tasks

Develop / Implement a Pre-Arranged Supply Plan: BEC shall develop and maintain a Pre-Arranged Supply plan that provides BEC personnel (and contractors) with sufficient supplies to support emergency operations during all types and levels of emergency event(s).

3.2 Annual Review / Ongoing Maintenance

The Pre-Arranged Supplies Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Pre-Arranged Supplies Plan shall be maintained by the Chief Operations Officer.

3.3 Supplies and Resources Preparation

- Overall Position: BEC maintains an adequate inventory to support on-going construction and operation of the BEC electrical system, and some additional inventory to be used in the event of a natural disaster or disruptions of electrical service to members. In a large-scale severe weather emergency that impacts the BEC system, BEC would likely need to obtain materials from other sources including TEC, contractors / suppliers, and other regional Cooperatives.
- Suppliers: BEC utilizes TEC Manufacturing & Distribution Services for the sourcing and warehousing of all distribution materials. This allows TEC M&DS to purchase all construction materials and to manage warehouses and ensure rapid delivery of needed materials through TEC's statewide distribution network.
- Advance preparations related to a specific approaching event: Preparations for a known approaching storm or system event are made. In the period prior to a likely event, emergency supplies shall be checked and supplemented if necessary. Pre-positioned supplies will be accessed and utilized as needed. The and/or the Logistics Director will manage the distribution of supplies to the appropriate Operations personnel with the assistance of TEC. Examples would be major storms, rising water, tornados, and more serious events such as public health pandemic events.
- Location of Emergency Supplies: BEC maintains warehouse / supply facilities at the main office in Bartlett, Texas. TEC has multiple warehouse and supply facilities located across the state.
- Fuel Supply: BEC has "call-upon" agreements in place with local bulk distributors of gasoline and diesel fuel. Bulk distributors, in turn agree to reserve fuel on behalf of BEC, during Major (E-2) and/or Catastrophic (E-3) events.
- Lodging/Food and Laundry: The BEC Chief Operations Officer is responsible for locating / arranging lodging, meals, and laundry service for BEC personnel incapable of returning home during Major (E-2) and/or Catastrophic (E-3) events and for contract support crews called upon to help in the restoration efforts.

3.4 Actions in a Major or Catastrophic Event

- The pre-arranged supplies shall be accessed and utilized as needed.
- Depending on the level of event the Chief Operations Officer shall manage the distribution of supplies

to the appropriate operations personnel and contact material suppliers to coordinate the potential need for additional materials and supplies.

- In a large-scale outage with significant damage to overhead distribution facilities where additional materials and supplies are required, BEC Chief Operations Officer shall manage and coordinate the procurement, delivery location and management of all materials and supplies.

(Section-4) Staffing During Emergency Response Plan

4.0 Purpose and Applicability

To provide the roles and assignments for BEC personnel during severe weather events and other types of potential emergency situations. The roles listed below can be assigned and delegated by the General Manager/CEO and/or the General Manager/CEO's designee.

4.1 Administration / Initial Tasks

Develop / Implement an Emergency Staffing Plan: BEC shall develop and maintain an emergency staffing plan based on the Incident Command System (ICS).

4.2 Annual Review / Ongoing Maintenance

The Emergency Staffing Plan shall be reviewed annually (or as needed) to ensure that the information is current. The EOP Administrator shall review the ICS roles to ensure they are up to date with the latest ICS best practices.

4.3 Emergency Staffing Plan

In the event of an emergency, BEC will utilize the standard organization structure to manage the event. The CEO will serve as the Incident Commander and oversee all aspects of the response efforts and tasks. Based on the duration of the event, the CEO may designate other BEC managers in the Incident Command role.

Additionally, the CEO will utilize BEC managers, supervisors and key staff in both standard roles and may designate personnel to assume other functional responsibilities and tasks, which may be outside the traditional job duties. Some of these assigned responsibilities may align with NIMS Incident Command Structure (ICS) roles, such as logistics, communication, restoration, and other functional roles.

Other non-traditional roles and tasks may include utilizing lineman to assist and orient contractors; engineering personnel in the field tasked with system evaluations; and other possible assignments on member services and other office personnel related to logistical support for lodging, meals and other types of logistical support.

4.4 Work Schedules

4.4.1 Continuous Work Time of Less Than 24 Hours

- Depending on the time of the day a storm/emergency occurs, service may be restored in less than 24 continuous work hours utilizing Department and District personnel. The key to determining restoration time is the use of experienced personnel to perform assessment of the affected areas. Based on this information, the Chief Operations Officer shall coordinate with District Supervisors to determine an approximate restoration time. If it is determined that work can be completed without working employees over 24 continuous hours (including regular shift), local supervision may choose to proceed accordingly.

4.4.2 Anticipated Continuous Work Time in Excess of 24 Hours

- Restoration of service more than 24 continuous work hours should be accomplished by implementing a rotating schedule of not more than 16 hours on-duty and not less than 8 hours off-duty; ideally 14 hours on and 10 hours off.

- The goal is to use most of the work force during daylight hours to maximize restoration effort. BEC shall maintain an around-the-clock schedule.
- For public safety, the night schedule should be staffed with sufficient personnel to handle severe emergencies (wires down, arcing equipment, etc.).
- Damage Assessment should continue so that work is ready for those crews returning from rest.
- The Chief Operations Officer shall retain the flexibility to coordinate different standard shift times according to the situation, season, or other factors.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure

5.0 Purpose and Applicability

To maintain real-time awareness of the prevailing weather and of developing weather events, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, that may have an impact on BEC's normal operations, and the policies and procedures related to declaring an emergency and activating the EOP.

5.1. Administration / Initial Tasks

Develop / Implement a Weather-Related Hazards Identification Plan and EOP Activation Procedure: BEC shall develop and maintain connection to mission-critical weather resources, to include National Weather Service (NWS), National Oceanic and Atmospheric Administration (NOAA) and other national, regional, and local media sources to monitor weather forecasts and current information. BEC will also have a procedure to activate the EOP.

Process: The shall develop a process to monitor, and track developing weather events and provide information to the proper contacts within the organization and also develop a process to activate the EOP to the relevant level and update these levels and status of the EOP as warranted by actual system conditions.

5.2 Annual Review / Ongoing Maintenance

The Weather-Related Hazards Identification Plan and EOP Activation Procedure shall be reviewed annually (or as needed) to ensure that the information is current and that the process is operating effectively. The Severe Weather Monitoring Plan shall be maintained by the EOC.

5.3 Weather-Related Hazards Identification Plan

5.3.1 Pre-Event Tasks

- The weather information is monitored by BEC's Operations personnel and is made available to field operations personnel as needed. BEC routinely monitors weather, including any severe weather, as part of its ongoing operation and maintenance practice. Depending on the severity of the weather forecast, BEC may preemptively enact various emergency plans and pre-position staff at various locations.
- The Chief Operations Officer will develop a team of BEC personnel to monitor severe weather during regular business hours and during non-regular business hours. The BEC personnel will typically include the General Manager/CEO; , Manager of Engineering; Chief Operations Officer; Line Superintendent(s); Dispatcher and other personnel as deemed necessary.
- The selected personnel will ensure that all critical BEC personnel are aware of severe weather forecasts and reports of actual severe weather and associated damage reports.
- Dispatch has a weather radio. This radio is dual powered, working on both batteries and/or the building's electrical service. This radio will be activated by the National Weather Service.
- BEC receives severe weather forecast summaries for large scale storm outbreaks (e.g., tornadoes, severe thunderstorms, wind, ice, etc.) from the Storm Geo, the National Weather Service; WTD; and other media-based weather information sources. Contact and link information in in the

Appendices Section.

- BEC maintains screens and monitors weather information in the BEC Operations / Dispatch work areas as well as in key offices and meeting rooms in each BEC facility.
- BEC monitors and reports weather / fire dangers information to BEC Operations personnel. Reporting shall be done via electronic communications (primary communications channel via email to management and supervisor group). Other communications may include text messages and / or video conference calls / meetings as appropriate.
- BEC uses various internet/web-based sources to access weather information. Multiple BEC management and staff monitor available weather websites and other sources. The weather sites provide data on storm movement, strength, and possible severe weather, tornado, or winter storm / ice scenarios.
- Storm and relevant weather information is shared via email(s) to BEC managers and supervisors and if there is limited lead time, BEC shall make calls and send texts to management, supervisors, and operations personnel as needed.
- BEC has the capability to “overlay” storm radar storms on the NISC outage maps. This allows BEC to correlate storm / weather conditions to active outage data.

Notes

- The following table provides links to various weather services resources:

Weather Service / Information Resources

| | |
|---|--|
| ERCOT – Meteorologist Report | www.ercot.com/about/weather |
| NWS – 5-day Rain Forecast | www.wpc.ncep.noaa.gov/qpf/day1-5.shtml |
| NWS – National Weather Service | www.weather.gov |
| NWS – Current Radar | radar.weather.gov |
| NOAA – Storm Prediction (Tornadoes) | www.spc.noaa.gov |
| NOAA – Storm Prediction (Hurricane & Tropical Storms) | www.nhc.noaa.gov |

5.4 EOP Activation Procedures

5.4.1 Procedure

When a situation, event, or incident is deemed to be an emergency, BEC shall utilize an Incident Command Structure (ICS) to coordinate activities and manage the event. This shall ensure that there are clear roles and responsibilities for each emergency event.

The Incident Commander is responsible for completing an “Emergency Declaration and Tracking Form” (EDT-Form) which is attached in the Appendix. This form shall document the time, scope, and

expected duration along with other key documentation of the event. If an emergency event changes state (e.g., from a “P” to an “E-1”; or from an “E-2” to an “E-3”), this form shall reflect these and other changes in status and relevant information regarding the emergency response.

5.4.2 Event Categories

The designation of an electric system emergency event or incident shall generally fall into the following types and levels of emergencies:

- **Pre-Emergency Preparation (P)**
 - BEC conducts normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.
 - Typically lasts up to 24 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.
- **Significant Event(s) (E-1)**
 - The emergency event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric service in one or more districts, with power being restored to all areas within 24 hours).
- **Major Event(s) (E-2)**
 - A segment of the organization has experienced a power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal field work.
 - Major events are severe but not yet catastrophic. This type of emergency needs to be monitored closely to determine if, in fact, it will escalate to a catastrophic condition.
 - Major events are expensive and can include problems like loss of critical components of the electric infrastructure such as substations, transmission assets (owned by BRAZOS EC), and large amounts of BEC’s distribution system. Could include loss of BEC’s ability to conduct business.
- **Catastrophic Event(s) (E-3)**
 - A Catastrophic Event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster; or the computer center is lost due to system failure for an extended period.
 - The organization must have systems in operation within 72 hours or experience significant economic loss.
- **Recovery (R)**
 - After an emergency event the organization shall require a period to return to normal operations.



§25.53 EMERGENCY OPERATIONS PLAN ANNEXES

(A) Weather Emergency Annex

A.1 Purpose and Applicability

To provide the procedures for BEC personnel to respond to cold or hot weather emergency situations by developing a checklist for BEC personnel to use during cold or hot weather emergency response to ensure necessary supplies and personnel are available through the weather emergency.

A.2 Administration / Initial Tasks

Develop / Implement a Hot and Cold Weather Emergency EOP Annex (Weather Emergency Plan): BEC shall develop and maintain a Weather Emergency Plan that provides the procedures for BEC personnel to implement to prepare for an imminent cold or hot weather event that has a probability of resulting in a system emergency event.

A.3 Annual Review / Ongoing Maintenance

The Chief Operations Officer shall conduct a review of the Weather Emergency Plan each year. The Weather Emergency Plan shall be maintained by the Chief Operations Officer.

A.4 Weather Emergency Procedures

A.4.1 Cold Weather Event Preparation Procedures

Starting 72-hours prior to the forecasted arrival of severe cold weather conditions (freezing rain, snow, ice, winds, and extreme cold temperatures); BEC Operation personnel shall:

- Ice Storms typically are predicted with several days' notice as weather conditions develop. Weather will be monitored at the BEC main office by television, weather radio, and internet as necessary.
- If an ice storm is predicted, material stock will be checked, and additional material ordered for major pole and line replacement. BEC and In-house Contractor vehicles will be made ice storm ready with truck and tool inspections, fueling and de-icing materials, housekeeping including cleaning windshields and lighting, and additional stock of wire, splices, connectors, and fuses. Additional windshield fluid will be maintained for use as needed. The Backup generator will be checked for fuel and operation for extended loss of power. Rock salt will be placed at strategic locations for application to sidewalks and parking areas at the main office and service center as required.
- All BEC employees and In-house Contract crews will be placed on notice to be available as needed during and after business hours. All crews will make up duffel bags with clothing required for working in extended cold weather work. *Dependent on predicted severity*, The County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Electric Cooperatives Inc. and additional contractors may be contacted prior to damages. Work order numbers and labor codes should be set up for each county prior to reconstruction.
- During icy conditions normal line construction will cease and vehicles will be arranged so that crews and equipment will have a short response time to all areas of the system. Travel will be restricted to "as required". Digger trucks will have additional poles loaded according to predicted severity.
- Contract crews must check in with the Supervisor as required if wishing to leave because of rain out. The Supervisor will contact the Dispatcher and determine if contractors may leave

or must make preparations for damage repairs. Contractors will inform the Supervisor of contact and equipment location information in case assistance is needed for restoration & repairs.

- If damage occurs from an ice storm, Supervisors, or Chief Operations Officer will serve as Coordinator(s) to direct crews and dispatcher.
- Crews will be dispatched to assess damage as soon as deemed safe. The Dispatcher and Coordinator(s) will assess, group, coordinate, and relay the outage information to the dispatched employees. At least two vehicles with repair employees will be dispatched and coordinated when available. Contractors may be dispatched as necessary to limit outage duration. GPS tracking may be used to monitor truck locations. Supporting equipment (bucket trucks, digger trucks, poles, and other material) may be dispatched as anticipated before actual need to limit outage duration.
- If area is declared a disaster area, The County Emergency Management Coordinator(s), The Texas Division of Emergency Management (TDEM) Coordinators, Texas Electric Cooperatives Inc. and the RUS GFR should be contacted as soon as possible. The Public Utility Commission must be contacted to report Significant Interruption if over 20% of membership is affected. Work order numbers and labor codes should be set up for each county prior to reconstruction.
- Field Crew Preparation – ensure all crews / trucks are supplied; including:
 - Fuses
 - Long Sticks
 - Handlines
 - Check heaters in warehouse
 - Chainsaw's gas, bar oil, and chains
 - De-icer for trucks
 - Contractors on standby
 - Overhead
 - Underground
 - Communication
 - Internal
 - External
 - Material
 - Fuel delivery
 - List of personnel to conduct field assessments
 - Realtime account notification
 - Critical Load Account notification
 - Check servers and computers
 - Push latest map update
 - ROW Contractor
 - Number of Crews
 - Point of contact for crews

A.4.1 Hot Weather Event Preparation Procedures

- Starting 72-hours prior to the forecasted arrival of extreme hot weather conditions (temperatures significantly above seasonal norms); BEC Operation personnel shall:
- Review engineer load study on the system (if needed)
- Field Crew Preparation – ensure all crews / trucks are supplied; including:
 - Fuses
 - Long Sticks
 - Handlines
 - Chainsaw's gas, bar oil, and chains
 - Check ice machines
- Contractors on standby
 - Overhead
 - Underground
- Communication
 - Internal
 - External
- Material
- Fuel delivery
- List of personnel to conduct field assessments
- Realtime account notification
- Critical Load Account notification
- Check servers and computers
- Push latest map update
- ROW Contractor
 - Number of Crews
 - Point of contact for crews
- Activate staffing plan to ensure Operations personnel are prepared and available for service during the anticipated timeframe of the hot weather event.

(B) Load Shed Annex

B.1 Load Shed Plan

B.1.1 Purpose and Applicability

To provide the procedures for shedding load, managing rotating outages, and managing planned interruptions in the reduction of load during periods of generation capacity shortages and other calls for curtailments. This Annex also includes a Critical Loads Registry Plan and a Restoration Plan that are linked to load shed events.

The BEC Emergency Operations Plan provides BEC with curtailment priorities, procedures for shedding load, managing rotating outages, and managing planned interruptions. BEC participates in the reduction of load during periods of generation capacity shortages and other called for curtailments. These include unplanned events where the ERCOT's system load exceeds available system generating capacity, including reserves. Curtailment procedures address emergency load shedding processes and provide curtailment priorities based on pre-developed plans and procedures.

Planning for a load curtailment at the ERCOT system level is extensive and is reviewed by Engineering and Operations. BEC participates with BRAZOS EC and maintains a list of which BEC distribution feeders will be curtailed and in what order they will be curtailed, in the event of a generation shortage or other unusual event requiring curtailments. BRAZOS EC may initiate a load shedding operation with little warning for events that are outside the BEC system. BEC Control Center employees are available to participate in the load shedding and service restoration operation if requested by BRAZOS EC (BEC's designated ERCOT TO).

BEC will maintain a Load Shed Plan section of the EOP with information regarding BEC's responsibilities and obligations related to the coordination and participation in the ERCOT Energy Emergency Alert (EEA) program and the ERCOT Underfrequency Load Shed (UFLS) program.

These programs require BEC as a Transmission and Distribution Service Providers (TDSPs) in ERCOT to coordinate with BEC's Designated Transmission Operator (DTO) on all aspects of these emergency load curtailment programs.

B.1.2 Administration / Initial Tasks

Develop / Implement a Load Shed Annex: BEC shall develop and maintain a Load Shed Annex in conjunction with the ERCOT Guidelines and Protocols and the BRAZOS EC Transmission Services Corporations (BRAZOS EC) Load Shed and UFLS Programs. Brazos Electric Cooperative (BRAZOS EC) is the ERCOT Designated Transmission Operator (DTO) and NERC Transmission Operator for BEC.

B.1.3 Annual Review / Ongoing Maintenance

BEC shall conduct a review of the EOP Load-Shed Annex each year. The EOP Load Shed Annex shall be maintained by the Chief Operations Officer and be filed in designated Directory.

B.1.4 Firm Load Shed Program Preparation and Testing

B.1.4.1 Roles and Program Information

- Planning for a load curtailment at the ERCOT system level is extensive and is reviewed by the Chief

Operations Officer and Brazos system operations staff annually.

- BEC will shed firm load under the direction of the Brazos Electric Cooperative System Operations Control Center. Factors such as duration and magnitude of the load shed will be highly dependent on the situation at the time of the event.
- BEC maintains a Load Shed List based on the required level of participation. The list indicates which BEC distribution feeders will be curtailed and in what order they will be curtailed, in the event of a generation shortage or other unusual event requiring curtailments.
- The Chief Operations Officer is responsible for maintaining the BEC feeders which are on the curtailment list. As part of the Annual Critical Loads Review, the Chief Operations Officer will also review the Load Shed List to be sure that there are no new Public Safety and/or Industrial Critical Load accounts being fed from the designated distribution feeders. Brazos Electric Cooperative can initiate a load shedding operation with little warning for events that are outside the BEC system.
- The Chief Operations Officer is the custodian of the Load Shed List and will update it once a year in the spring.

B.1.5 Firm Load Shed Procedures

- BRAZOS EC, as an ERCOT DTO is Responsible for Firm Load Shed. BRAZOS EC receives directives for load shed from ERCOT during EEA-3 events.
- BRAZOS EC publishes a list that shows how much load needs to be curtailed from BEC distribution feeders in an ERCOT Energy Emergency Alert (EEA) Level-3 load shed event. This list is posted on the BEC SCADA page.
- The Chief Operations Officer is responsible for:
 - Maintaining the BEC feeders which are on the curtailment list.
 - Reviewing the Curtailment List to be sure that there are no natural gas facilities serving generations or Industrial Critical Load accounts being fed from the designated distribution feeders.
- As EEA levels move from EEA Level-1 to EEA Level-2, BEC shall take appropriate actions to prepare for the possible EEA Level-3, which is the level where ERCOT calls for Transmission Operators to initiate load shed, also referred to as “rolling blackouts”.
- During an EEA Level-3 event, BRAZOS EC will provide load shed directives to BEC dispatchers that will execute trip / close operations based on the pre-determined load shed feeders.
- BRAZOS EC provides load shed directives to BEC control center / dispatchers and BEC controls the load shed of the feeders enrolled in the current Load Shed plan. BEC’s Dispatch / SCADA operators shall observe the “trip / close” operations of these feeders and track the outage information in the BEC Outage Management / Tracking system.
- In an ERCOT EEA event, BEC is responsible for monitoring information and communications from ERCOT and BRAZOS EC.

- BEC field operations shall remain on stand-by, should BEC SCADA TEAM lose SCADA control and request assistance to manually open or reclose circuit breakers at the substation location. These field operations tasks can occur only with explicit instructions from BEC SCADA TEAM.

B.1.4 Under-Frequency Load Shed (UFLS):

- BRAZOS EC publishes a Percentage of load spreadsheet of which BEC distribution feeders have armed UFLS relays.
- BEC coordinates / participates with BRAZOS EC in the ERCOT Underfrequency Load Shed planning. BEC has enabled UFLS relays (distribution reclosure contacts) to react to Underfrequency events.

The under-frequency relays shall be set to provide load relief as follows:

| Frequency Threshold | UFLS Stage |
|----------------------------|--|
| 59.3 Hz | 5% of the ERCOT System Load (Total 5%) |
| 58.9 Hz | An additional 10% of the ERCOT System Load (Total 15%) |
| 58.5 Hz | An additional 10% of the ERCOT System Load (Total 25%) |

B.2 Restoration Plan

B.2.1 Purpose and Applicability

To provide the guidelines, policies, and procedures that BEC shall utilize in system restoration activities, including restoration after an ERCOT Firm Load Shed event. BEC will maintain a Restoration section of the EOP, that contains information regarding the operational policies, approach and responsibilities related to restoration of service during emergency situations and events.

B.2.2 Administration / Initial Tasks

Develop / Implement a Restoration Priorities Plan as part of the EOP Load Shed Annex: BEC shall develop and maintain a Restoration Priorities Plan that includes restoration priorities and procedures, including restoration procedures after an ERCOT Firm Load Shed event. The Chief Operations Officer develops and maintains the Restoration Priorities Plan.

B.2.3 Annual Review / Ongoing Maintenance

Chief Operations Officer shall conduct a review of the Restoration Priorities Plan each year. This review shall occur prior to the annual table-top exercise, or as needed. The Restoration Priorities Plan shall be reviewed as necessary or at a minimum, annually.

B.2.4 Restoration Priorities and Process

BEC will coordinate with BRAZOS EC regarding the restoration of feeders that are shed in a Firm Load Shed (EEA-3) event.

B.2.3 Annual Review / Ongoing Maintenance

The Chief Operations Officer shall conduct a review of the Restoration Priorities Program / Plan each year. This review shall occur prior to the annual table-top exercise, or as needed. The Restoration Priorities

Program / Plan shall be reviewed as necessary or at a minimum, annually.

B.2.4 Restoration Priorities and Process

- In ERCOT EEA Level-3 Load Shed events and events with widespread outages across BEC's service area, BEC will utilize the following guidelines for restoration:
 - BEC will coordinate with BRAZOS EC regarding the restoration of feeders after an ERCOT Firm Load Shed event. Feeders should be restored to service by BEC, however if individual feeders cannot be restored through the BEC SCADA, due to cold load pick up or other factors, BEC will restore these feeders by sectionalizing these feeders to allow restoration of service.
 - In widespread outages, BEC will first conduct assessments of the outage situation to identify the condition of major facilities and system infrastructure. This assessment may require the use of helicopter or other types of aerial surveying.
 - BEC will contact aerial survey contractors to establish contact, pricing, and contract arrangements.
 - BEC will review accounts that are considered / listed as Public Safety accounts in the BEC Critical Load Registry. This will ensure that these accounts can be factored in appropriately to BEC's service restoration plans.
 - Once BEC has information on status of the BEC distribution system, along with information from ERCOT and BRAZOS EC regarding the ERCOT system and the regional transmission system, BEC will develop a restoration plan with the following goals and priorities:
 - BEC will target main infrastructure (system "backbone" feeders) that will allow the greatest number of facilities and accounts to be re-energized;
 - BEC will identify and strive to restore service to the public safety accounts and the largest groups of end-users (i.e. feeders, laterals, busses, and individual members); Rural Water Systems; Communications Infrastructure.
 - Special conditions arising from an emergency pertaining to service interruptions that have the potential for life-threatening or hazardous consequences will be given priority status if expedited restoration at the location is practical.

B.3 Critical Load Registration

B.3.1 Purpose and Applicability

To provide guidelines to help determine, prioritize, and manage classes of members to whom electric service is essential to life, health, public services, and safety and who shall be given priority, to the degree practicable, in restoration activities.

B.3.2 Initial Tasks

Develop / Implement a Critical Loads Plan as part of the EOP Load Shed Annex: BEC shall maintain an EOP Annex that describes and provides information on the Cooperative's Critical Load Registry. The EOP Critical Load Plan shall include information on several types / categories of critical load accounts proved information on the Critical Load Registry which is maintained and located in the BEC NISC Customer Information System (CIS).

B.3.3 Annual Review / Ongoing Maintenance

The Critical Load Plan and Registry process shall be reviewed annually (or as needed) to ensure that the enrollment / registration process is effective and the information in the CIS system is accurate. The EOP Administrator and Member Services Supervisor shall periodically review the reports from the CIS system and implement procedures to ensure the information is accurate and current.

B.3.4 Critical Loads Actions

- Registry Maintenance: The registry is updated in an ongoing manner, with an application section provided on the BEC website and forms available for members that request a hard-copy form.
- Training: BEC staff shall receive annual training on all aspects of communications, tracking and services to Critical Loads members.
- Registry Use: Prior to a planned outage or an anticipated event, BEC shall attempt to notify appropriate categories of registry members by text message or other means to provide information regarding the outage or event. If communication service is not available, BEC shall attempt to notify critical loads through other channels.
- Member Information: All BEC members shall be provided with information related to eligibility to be on the BEC Critical Load Registry, including the Critical Care Residential Member and Chronic Condition lists.
 - BEC shall notify each residential applicant for service of the right to apply for Critical Care Residential Member or Chronic Condition Residential Member designation. This notice to an applicant for residential service shall be included on the BEC website and provided in the new member information package.
 - BEC shall provide information about Critical Care Residential Member, Chronic Condition Residential Member, Critical Load Public Safety and Critical Load Industrial designations on the BEC website.
 - BEC shall provide a bill insert / letter to all members periodically (on an annual basis) in accordance with Senate Bill-3 requirement.
 - Upon a Member's request, BEC shall provide to the Member the link to the application form for Critical Care Residential Member and Chronic Condition Residential Member designation on the BEC website or send a hard copy form to the member if requested. This application and description shall be included in the "Member Information" section of the BEC website.

B.3.5 Definitions

- Critical Load Public Safety Member: A member for whom electric service is considered crucial for the protection or maintenance of public safety, including but not limited to hospitals, police stations, fire stations, and critical water and wastewater facilities.
- Critical Load Industrial Member: An industrial member, for whom an interruption or suspension of electric service shall create a dangerous or life-threatening condition on the retail Member's premises, is a "Critical Load Industrial Member." This category includes critical gas pipeline infrastructure accounts.

- Chronic Condition Residential Member: A residential member who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to prevent the impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition. If that serious medical condition is diagnosed or re-diagnosed by a physician as a life-long condition, the designation is effective under this section for the one year (note BEC considers these designations effective for two years) or until such time as the person with the medical condition no longer resides in the home.
- Critical Care Residential Member: A residential member who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or re-designation is effective for two years under this section.
- BEC maintains a Critical Load Registry in the NISC CIS system. This registry informs BEC's Operations / Restoration team about certain accounts that are deemed "priority" in terms of restoration planning. Restoration Account / Load priorities include:
 - BEC will make every effort to communicate with Critical Load members via text, SMS messages, phone calls, and other appropriate communication methods in advance of planned outages and in advance of anticipated and predictable weather emergency or other anticipated system emergency events.
 - BEC will coordinate with BRAZOS EC regarding the types of Critical Load accounts that should be exempted from the BRAZOS EC Firm Load Shed program, by excluding feeders with accounts that BRAZOS EC deems as Critical Loads in the context of Firm Load Shed.

(C) Pandemic and Epidemic Annex

C.1 Purpose and Applicability

Provide guidelines and procedures to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic event and to generally prepare BEC for the possibility of a pandemic.

C.2 Administration / Initial Tasks

Develop / Implement a Pandemic EOP Annex (Pandemic and Epidemic Plan): BEC shall develop and maintain a Pandemic and Epidemic EOP Plan that shall provide the following:

- Education of employees about a possible pandemic and its possible impacts on BEC's business operations;
- Reasonable measures to mitigate the impact of a pandemic and/or epidemic on BEC and its employees;
- Information regarding the promotion of employee wellness and minimize opportunities for employees to be exposed to pathogens while at BEC.

C.3 Annual Review / Ongoing Maintenance

The Chief Operations Officer shall conduct a review of the Pandemic Plan when changes are deemed necessary, but at a minimum annually.

C.4 Preparation for a Pandemic

- Develop / Implement a Pandemic and Epidemic Plan: BEC shall develop and maintain a Pandemic and Epidemic Plan that addresses the policies and procedures that BEC shall utilize in all types and levels of pandemic event(s). The Chief Operations Officer with work with the Member Services Supervisor to develop and maintain a Pandemic Plan
- Operations and Business Continuity: It shall be important to monitor the status and changes to any pandemic / potential pandemic situation and provide accurate and timely information distribution to employees, members, and the public before and during the pandemic. BEC standard operations and associated policies may need to be revised in order to minimize risks associated with spread of a virus / contagion.

C.5 Pre-Event Tasks

- In the period prior to a likely event, a checklist of items should be considered when developing departmental business continuity plans for a pandemic.
- The Human Resources Administrator shall monitor information from federal, State and Local government agencies including the Centers for Disease Control (CDC) for notification of pandemic activity. Determining the existence of a pandemic condition shall involve the federal, state, and local health officials. Reports of verified infections, severity of symptoms, and location and percentage of population affected are statistics that shall be available from health officials as the pandemic situation develops.
- BEC shall go into a Pandemic / Epidemic Alert Condition based on evaluation of the situation from CDC and other information from health officials.

- A significant increase in the level of contagious disease activity would be reported to BEC managers (and the Incident Commander if ICS is deployed), which would then be responsible for determining if specific action related to the activation of a pandemic response is required.

C.6 Policies and Procedures During an Active Pandemic Situation

- BEC shall monitor and implement all federal, state, and local directives regarding a pandemic. These directives may include:
 - Facial mask requirements for employees and public / members in BEC facilities
 - Office / lobby closures
 - Suspension of in-person meetings
 - Reduction or elimination of business travel

C.7 Policies / Procedures

- Altered BEC office hours, accessibility, and other measures may be implemented to address safety for employees, members, and the public.
- The standard job functions of engineering, operations, dispatching, administration, information technology (IT), warehousing and accounting have identified and prioritized key employees and back-ups for normal operations and their modified job responsibilities under a pandemic condition.
- Efforts shall be made to educate employees about all possible contagions, how these contagions spread, and how BEC is preparing for these types of potential situations.
- Educational and informational messages shall include the following:
 - Do not report to work if sick or exhibiting any symptoms or conditions identified by the Centers for Disease Control (CDC).
 - Do not return to work until all symptoms have cleared and all return requirements have been met.
 - Limit face-to-face meetings.
 - Limit travel.
- BEC shall communicate changes in policy and/or practices in a Pandemic event.
- BEC may suspend face-to-face meetings and non-critical business travel.
- Employees shall be encouraged to obtain vaccinations (including annual flu shots).
- BEC shall encourage and adopt sanitary practices in a Pandemic event. BEC shall maintain supplies to maintain a sanitary environment and supplies shall be kept on hand and deployed, as necessary.
 - Hand sanitizer
 - Disinfectant spray
 - Rubber gloves
 - Masks
 - Alcohol-based hand sanitizer in all common areas (restrooms, break rooms, conference rooms, and at all meetings where food and drink are served).
 - Disinfectant spray (e.g., Lysol) in all restrooms.

- Facial tissues (e.g., Kleenex) in all meeting rooms and break rooms.
- Brief cleaning crews on disinfecting techniques.

C. 8 Business Continuity During Pandemic / Epidemic

- Department heads shall be asked to re-examine their critical business process plans to determine if changes are necessary to cover a contagious disease pandemic.
 - Are employees within the department and/or division cross-trained in job functions related to critical business processes?
 - Could the department continue to perform its critical business processes with a 40-50% employee absentee rate?
 - Which employees' job functions could be performed from home?
 - Which of those employees are equipped to work from home (home computer, Internet access, etc.)?
- The IT Division may develop plans for a wide deployment of software and services during a pandemic or epidemic to support a large number of "Work from Home" employees.

C.9 Post Event Tasks

- Conduct thorough event critique throughout the period of the pandemic / epidemic. If the pandemic / epidemic lasts for a prolonged period (not just a typical flu season) BEC shall schedule regular review of measures, business continuity policies, and other applicable business and safety issues.
- Participate in joint public agency review sessions following event to identify areas for improvement and share lessons learned.
- Review and modify response and operations plans based on after action findings.

C.10 Resources

- Definition-Pandemic: A pandemic event is an epidemic of Infectious disease that has spread through human populations across a large region. Pandemics can create a situation that reduces the business work force by up to 50% for a significantly long duration.
- Definition Epidemic: A widespread occurrence of an infectious disease in a community at a particular time.
- The Centers for Disease Control (CDC) website: www.cdc.gov/

(D) Wildfire Annex

D.1 Purpose and Applicability

To provide the guidelines, procedures and best practices related to wildfire mitigation and document BEC's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery.

D.1 Administration / Initial Tasks

Develop / Implement a Wildfire Annex: BEC shall develop and maintain a Wildfire Annex that shall address the wildfire prevention, policies, and procedures that BEC shall utilize in all types and levels of emergency event(s).

D.2 Annual Review / Ongoing Maintenance

The Wildfire Annex shall be reviewed annually (or as needed) to ensure that the information is current. The Wildfire Annex shall be maintained by the Chief Operations Officer.

D.3 Wildfire Mitigation Actions

- During periods of drought and high fire danger, BEC may reach out to members and first responders throughout its service territory to inform and educate them on electrical safety and share information regarding wildfire prevention and mitigation.
- During periods of drought and high fire danger, BEC may conduct electrical safety training for first responders including law enforcement agencies, fire departments, public works, and transportation agencies.
- BEC may participate in annual joint exercises that include external partners from the first responder community and the emergency management community to enhance preparedness and prevention efforts.
- BEC may meet with local, state, and federal agencies and jurisdictions to share fire prevention plans and strategize for the coming year.
- BEC operates and maintains a Vegetation Management Program that is in accordance with BEC requirements and best practices. This practice includes:
 - Trimming trees away from power lines to eliminate the possibility of arcing which can start fires beneath the line.
 - Right-of-way Assessment by internal and external Arborists.
 - Identification of Hazard Trees to be removed immediately.
 - BEC adheres to regulatory clearance requirements.
- Maintenance inspections of BEC distribution system include the following:
 - Ground line pole inspections
 - Document patrol and inspection activity
 - Circuit Health Monitoring System
 - Identify wildfire high threat zones
 - Repair and/or replacement of damaged facilities or equipment that can be a source of arcing

which can start fires beneath the line.

- BEC monitors Severe Weather Information (see Severe Weather Monitoring section in the EOP). This includes monitoring days and periods of high fire danger, red flag warnings and other related weather information. This information is available from numerous entities.
- BEC monitors the status related to wildfire conditions including TFS fire index ratings of Extreme or Very High; US Forest Service Fire Danger Class Low to Extreme and the National Weather Service (NWS) Red Flag warnings and alerts. BEC also monitors the Texas A&M Forest Service wildfire risk assessment portal.
- BEC Chief Operations Officer is responsible for the dissemination of this meteorological and fire threat information to employees and contractors within its service territory to ensure they are informed of critical conditions that may impact the operation of the BEC electrical delivery system.
- During periods of high fire risk, BEC shall perform a thorough review of current electric planning, operations, design, and construction practices to reduce and if needed, to eliminate certain risks.
- Specific mitigation actions include the following:
 - Crimped connectors are used instead of hot line clamps at line jumpers and other continual load carrying connections.
 - Copper leads are installed on transformer secondary bushings to limit burning connections.
 - New construction is along roads when possible to limit exposure across country.
 - A pole and line inspection program is in place on a ten year cycle to find and correct decayed poles, equipment defects, insufficient line clearance, and ROW issues.
 - A ROW line clearance program is in place on a 5-year cycle to limit faults due to trees. Minimum clearing dimensions are 10-foot clearance on each side of the power line in accordance with utility easements and 10 feet below. Larger areas and clear cutting is performed when allowed by the property owner. Herbicide is used on clear cut and small trees when allowed by the property owner.
 - 5kV insulated wire is used for jumpers on line equipment in addition to wild life protectors on equipment bushings.
 - While performing hot line work, SCADA is used to initialize “Hot Line Tag” to limit the fault current during unintended contact.
 - Trucks are not to idle on or in dry grass or brush unless necessary. If the truck must remain running, extra care and monitoring will be performed by the employees.
 - Service trucks carry a 2 lbs. Class ABC Fire Extinguisher, Bucket and Digger Trucks carry a 2 lbs. Class ABC Fire Extinguisher and a 5 lbs. Class ABC Fire Extinguisher.

D.5 Responses to Fire Events

- Coordinate with local entities, support firefighting efforts as requested.
- Provide requested personnel to work directly with fire suppression personnel to identify potential hazards.
- De-energize circuits in areas of active fire situations.
- Employees are on scene during the beginning of a fire, conduct a survey of the scene for safety.

- Remove danger from scene if possible as conditions allow such as putting grass fires out with fire extinguishers, de-energizing line, clearing persons, traffic, or property from the area.
- Call 911 at first indication that additional help is required. Contact Dispatch and Supervisors as soon as the conditions above allow.
- Contact property owners and conduct an investigation with measurement and pictures when safe to do so.
- If responding to a fire already in progress, ensure that 911 has already been called. Upon arrival, conduct safety survey, and communicate with and assist fire departments as needed by de-energizing lines or services as required.
- Contact members in affected areas if able to do so.
- Contact and coordinate with Texas Electric Cooperatives, County Emergency Management, Emergency Command Centers, Fire Departments, and media if necessary.
- Survey burn area and weather conditions; De-energize lines in the fire path if energized lines create an additional risk to health or property.

D.6 Post-Incident Recovery

- Conduct thorough post event critique within 2-weeks after a fire related incident and participate in joint public agency review sessions following event to identify areas for improvement and share lessons learned.
- Review and modify response and operations plans based on after action findings. Additional clearing of hazardous, burned, or damaged vegetation in recovery zone. Identify, repair/replace damaged equipment. Cleaning of conductors and insulators for fire retardant and particulate matter.
- The following table provides links to various Wildfire Services resources:

Wildfire Services / Information Resources

| | |
|-------------------------------------|---|
| Texas Forest Service (Advisories) | https://tfsweb.tamu.edu/CurrentSituation/ |
| Texas Forest Service (wildfire map) | https://public.tfswildfires.com/ |
| NWS Fire Weather Outlook | https://www.spc.noaa.gov/products/fire_wx/ |
| NOAA – Current Drought Conditions | https://www.drought.gov/ |

(E) Hurricane Annex

E.1 Applicability

The Public Utility Commission EOP Rule (16 TAC 25.53) requires Cooperatives to include a Hurricane Plan if BEC's facilities (service area) is located within a hurricane evacuation zone, as defined by the Texas Department of Emergency Management (TDEM). BEC's services area and facilities are not within a Hurricane Evacuation Zone, therefore, BEC has not included a Hurricane Annex in BEC's EOP.

(F) Cyber Security Annex

F.1 Purpose and Applicability

To provide the guidelines, procedures and best practices related to cyber security for the BEC electric distribution system.

F.2 Administration / Initial Tasks

Develop / Implement a Cyber Security EOP Annex (Cyber Security Plan): BEC shall develop and maintain a Cyber Security Plan that shall address the prevention, policies, and procedures that BEC shall utilize to protect the BEC distribution system and respond to emergency events and situations.

F.3 Annual Review / Ongoing Maintenance

The Cyber Security Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Cyber Security Plan shall be maintained by the IT/Broadband Security Supervisor.

F.4 Cyber Security Policies and Procedures

F. 4.1 Overview

Cyber threats are a potential source of emergency conditions at BEC (and the utility sector in general). The EOP Administrator and IT/Broadband Security Supervisor will ensure that BEC's Cyber Security Plan incorporates policies and procedures related to Emergency Operations. BEC will develop and maintain a Cyber Security Program in order to reduce the probability of a cyber-attack that impacts BEC's operations, BEC member's information or any other aspect of BEC's overall security. BEC will have a plan to adequately protect Information Technology assets, sensitive data, and member data. The EOP Administrator will coordinate with the IT/Broadband Security Supervisor to ensure the technology and controls are in place to maintain the security of its systems and data:

- Use of company policies about the use of computers, Internet, offsite CDs and other forms of data storage.
- Maintain the readiness of onsite Firewalls and protected IP addressing.
- Maintaining the security of the password system and controlling the access of the network administration.
- Performing daily backups of computer data, both network server and consumer information system.
- Maintaining a set of current back-ups offsite in a secured location. These are updated daily.
- Maintaining current anti-virus software and checks.
- Including cybersecurity in the procurement process.

F.4.2 Scope

All employees, contractors, consultants, temporary and other workers at BEC and its subsidiaries must adhere to all policies and procedures authorized and approved under this program. This applies to cooperative data sets and technology equipment that is owned, operated, or leased by BEC. The policy describes the technology and information assets that must be protected and identifies many

of the threats to those assets. The equipment, software, and storage medium used to process, store, and transmit information will be protected by appropriate controls.

F.4.3 Policy

The Policies and procedures will ensure that:

- Sensitive, protected, and/or privileged Information and technology systems will be safeguarded against any unauthorized access.
- Confidentiality of sensitive, protected, and/or privileged information will be assured.
- Integrity of information will be maintained.
- Availability of information for business purposes will be maintained.
- Legislative and regulatory requirements will be met.
- Business continuity and disaster recovery plans will be developed, maintained, and tested bi-annually.
- All BEC employees will be provided information security and awareness training on a regular basis.
- Any actual or suspected information security breaches will be reported to the Information and Technology Team. All breaches will be investigated thoroughly and logged.
- Policies and Procedures have been established to support this program, including appropriate controls and continuity plans.
- Business requirements for availability of information systems will be met.

(G) Physical Security Incident Annex

G.1 Purpose and Applicability

To provide the guidelines, procedures and best practices related to physical security for the BEC electric distribution system.

G.2 Administration / Initial Tasks

Develop / Implement a Physical Security EOP Annex (Physical Security Plan): BEC shall develop and maintain a Physical Security Plan that shall address the prevention, policies, and procedures that BEC shall utilize to protect the BEC office complex, substations, system facilities and respond to emergency events and situations. To provide guidelines and procedures for gaining appropriate access to secured office buildings, substations and to enhance personal safety for all Cooperative personnel, contractors, visitors, and members who work or conduct business on a Cooperative campus.

G.3 Annual Review / Ongoing Maintenance

The Physical Security Plan shall be reviewed annually (or as needed) to ensure that the information is current. The Physical Security Plan shall be maintained by the Chief Operations Officer.

G.4 Physical Security Guidelines

- Guidelines:

- The office buildings are equipped with electronic access control systems on each outside entrance and external gates. All substations are owned by Brazos Electric Cooperative.
- The fence that encompasses the supply yard is also equipped with an electric fence to deter any outside entrance to the property.
- All Cooperative personnel and approved contractors will be provided with an electronic access card to be utilized to gain access to secured facilities in conjunction with their job duties.
- All other visitors to the cooperative will enter through the designated main office entrance.
- Surveillance systems are operational that monitor buildings and parking lot 24/7.

- Provisions:

- Secured access to buildings
 - All secured entrances doors and secured gates will be kept secure so that access is only available by electronic card key.
 - Any entrances not secured properly will be reported immediately.
- Cooperative personnel and approved contractors
 - All Cooperative personnel and approved contractors will be supplied with a card equipped with electronic access capabilities for all outside doors, gates and may enter secured office buildings and secure areas in conjunction with their job duties.

- Visitors:

- Visitors or contractors without approved access should be directed to the designated

main entrance of the appropriate building.

- Visitors to area offices will be directed to the main lobby entrance.
- A staff member must meet their visitor in the main lobby to ensure.
- A staff member must escort their visitor out of the building.

○ Surveillance System

- Each building will be video monitored 24/7
- Substation motion alerts are active 24/7 alerting Dispatch when there is an event.

○ Security System

- All outside entrances and internal secured areas are outfitted with security sensors. Buildings are also equipped motion sensors.
- All sensors are set to auto-activate daily at 8:45 pm and can be manually activated at anytime from the security panels.
- In the event of an active alarm the following events will occur:
 - Primary contact is called by monitoring center to inquire if the alarm was false.
 - If primary contact does not answer, the police will be dispatched and the monitoring center will try contacting the alternate points of contact one at a time until someone answers to provide further instructions.

EXECUTIVE SUMMARY

§25.53 EMERGENCY OPERATIONS PLAN

BEC
POWER

PROJECT NO. 53385

AFFIDAVIT OF GENERAL MANAGER AND

CHIEF EXECUTIVE OFFICER OF

BARTLETT ELECTRIC COOPERATIVE, INC.

PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF BELL §

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned affiant, who swore on oath that the following facts were true:

“My name is Bryan Lightfoot. The facts stated within this Affidavit are within my personal knowledge and are true and correct. I am over the age of eighteen years and am of the soundness of mind necessary to testify to the facts stated in this Affidavit. I am competent to make this Affidavit.

“I am the General Manager and Chief Executive Officer of Bartlett Electric Cooperative, Inc. (Bartlett Electric), which is a Texas electric cooperative corporation.

Bartlett Electric operates an electric distribution utility system in the State of Texas and the Electric Reliability Council of Texas power region.

Bartlett Electric has adopted an Emergency Operations Plan (EOP) that complies with 16 Texas Administrative Code §25.53 - Electric Service Emergency Operations Plans (EOP Rule), which was adopted by the Public Utility Commission of Texas on February 25, 2022.

Bartlett Electric’s 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 special circumstances during the course of an emergency. The EOP has been reviewed and approved by the appropriate executives of Bartlett Electric.

Drills will be conducted to the extent required by subsection (f) of the EOP Rule. For calendar year 2022, the first drill is expected to occur on June 8, 2022.

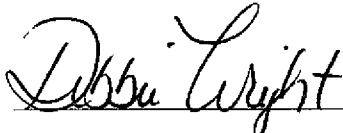
The EOP or an appropriate summary of the EOP has been distributed to local jurisdictions as needed.

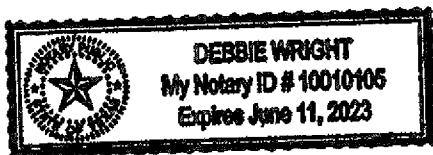
Bartlett Electric maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

Bartlett Electric'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."


Bryan Lightfoot

Sworn and subscribed before me on this 18 day of April, 2022, by Bryan Lightfoot.


Notary Public in and for the State of Texas



Executive Summary

The Bartlett Electric Cooperative, Inc. (BEC) Emergency Operations Plan (EOP) was developed to comply with 16 Tex. Admin. Code §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. 16 TAC §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide the Cooperative with a clear set of guidelines, policies, and procedures intended to guide preparations, responses, and actions related to all phases and types of electric system emergencies. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (16 TAC §25.53) and is intended to guide the organization in the preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

BEC maintains the EOP in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- Provide the structure, policies, and procedures to guide the organization during all types of emergency conditions and situations.
- Enable BEC, other utility and governmental entities, members, and stakeholders to coordinate and communicate effectively during emergency situations and events.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing BEC's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that BEC maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes and includes Appendices that provide additional information related to the EOP.

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 7 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes an introduction and purpose of the plan and a statement regarding the applicability of the EOP. And to emphasize the commitment of the Cooperative's senior leadership, this section includes a "Message from the General Manager" that underscores the importance of the plan and encourages all BEC personnel to learn the plan and work with their respective supervisors and teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for BEC and prescribes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 15 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan section. This section of the plan includes the strategies, key policies, roles, and communications steps that BEC undertakes in an emergency event. Key

policies include tracking and coordination of external communications, the designation of spokesperson(s) for the Cooperative, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses all the requirements in 16 TAC §25.53 regarding communications with the public, the media, BEC members, the PUC, OPUC, local and State Governmental Entities, Officials, and (County) Emergency Operations Centers, ERCOT, and Critical Load members. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

(Section-3) Pre-Identified Supplies for Emergency Response Plan:

This section begins on page 19 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides information on Pre-Identified Supplies for Emergency Response and identifies the guidelines for the management of materials, supplies and resources that BEC may need during emergency events. The plan provides details regarding the internal roles and responsibilities; use of outside suppliers; advance preparation; location of materials and supplies; and other logistical information.

(Section-4) Staffing During Emergency Response Plan:

This section begins on page 21 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP provides information regarding Staffing During Emergency Response and the roles and assignments for BEC personnel during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that BEC will utilize and addresses work schedule for BEC personnel that BEC shall use in significant and major system emergency events.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure:

This section begins on page 23 of the EOP and corresponds to §25.53(d)(5).

The final section of the EOP is the Weather-Related Hazards Identification Plan and EOP Activation Procedure section. BEC has a series of policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This section also provides the policies and procedures related to the activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels identified in the plan.

EOP Annexes

Weather Emergency Annex:

This section begins on page 27 of the EOP and corresponds to §25.53(e)(1)(A).

The Weather Emergency Annex addresses preparation for both hot and cold weather emergencies. The key policies in this section set forth the requirement for BEC to develop and utilize a checklist for BEC to activate in extreme weather situations.

Load Shed Annex:

This section begins on page 30 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding BEC preparations and actions for ERCOT Emergency Event Alerts (EEA) levels and include details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between Brazos Electric Cooperative (ERCOT Transmission Operator) and BEC regarding the planning and preparation for load shed events and contains detailed information regarding other operational information for EEA events. This Annex also contains information on the BEC procedure for restoration coordination with Brazos Electric Cooperative following a load shed event, and key

policies and procedures that BEC utilizes for restoration from significant system outage events. The final subsection of this Annex provides information on BEC's Critical Load Registry and information related to the maintenance of the registry, communication procedures to these members, and other relevant information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 36 of the EOP and corresponds to §25.53(e)(1)(C).

In the Pandemic and Epidemic Annex, BEC has provided the Cooperative's policies, procedures, and guidelines that are designed to prepare for pandemic and epidemic outbreaks, and to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic event. Key policies in this section address the steps BEC takes regarding prevention and preparation, policies related to remote work for BEC personnel, and steps BEC takes to ensure BEC adheres to policies implemented by state and local agencies.

Wildfire Annex:

This section begins on page 39 of the EOP and corresponds to §25.53(e)(1)(D).

The Wildfire plan provides the guidelines, procedures and best practices related to wildfire mitigation and document BEC's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery. This section includes wildfire mitigation actions along with steps BEC would take to respond to any wildfire events.

Hurricane Annex:

This section begins on page 42 of the EOP and corresponds to §25.53(e)(1)(E).

BEC's service is not located in a Hurricane Evacuation Zone (HEZ), and therefore BEC's EOP does not include this annex.

Cyber Security Annex:

This section begins on page 43 of the EOP and corresponds to §25.53(e)(1)(F).

The Cyber Security Annex provides the guidelines, procedures and best practices related to cyber security for the BEC office facilities and electric distribution system. Based on BEC's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security and employee education.

Physical Security Incident Annex:

This section begins on page 45 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures BEC has implemented to protect the office complex and other facilities that are critical to the operation of the BEC electric distribution system. Based on BEC's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for BEC's facilities, visitors, and surveillance.

Plan Distribution and Training

The table below documents the distribution list of the EOP and the associated training document to BEC personnel and the date the training was completed by each employee:

| BEC Personnel | | EOP Distribution Date | EOP Training Completed Date |
|----------------------|------------------------------|--------------------------------------|--|
| Name | Title | | |
| Robbie Sorrell | Chief Financial Officer | 4/12/2022 | 4/14/2022 |
| Ken Slack | Chief Engineering Officer | 4/12/2022 | 4/14/2022 |
| Billy Wise | Chief Broadband Officer | 4/12/2022 | 4/14/2022 |
| Carrie Wenzel | Chief Human Resource Officer | 4/12/2022 | 4/14/2022 |