Filing Receipt

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Control Number - 53385

Item Number - 2755

Clearway Energy Group LLC
1200 Smith Street, Suite 600
Houston, TX 77002

clearwayenergygroup.com

Clearway

February 14, 2025

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

Re: Project No. 53385: Emergency Operations Plan Submission of Ocotillo Windpower, LP

Dear Filing Clerk:

In accordance with Public Utility Commission of Texas Substantive Rule § 25.53, Ocotillo Windpower, LP hereby submits its emergency operations plan ("EOP") submission. This submission includes the following:

- an executive summary that (a) describes the changes made to the contents and policies set forth in the EOP, (b) includes references to specific sections and page number of the EOP that correspond with the requirements of Rule § 25.53, (c) includes a record of distribution, and (d) includes an affidavit; and
- a complete copy of the EOP with confidential portions removed.

If you have any questions, please do not hesitate to contact me at 346-293-7088.

Respectfully submitted,

Gretchen Schott
Senior Regulatory Counsel
Clearway Energy Group LLC
Email: gretchen.schott@clearwayenergy.com

Emergency Operations Plan Submission of Ocotillo Windpower, LP
February 14, 2025

Executive Summary

Changes Made to Contents and Policies in EOP

Ocotillo Windpower, LP ("Ocotillo") owns and operates the Ocotillo facility, which is a wind-powered facility with a nameplate capacity of 54.6 MW located in Forsan, Texas. Referred to as an Emergency Action Plan, the Ocotillo EOP sets forth procedures and actions to be followed by Ocotillo site personnel and contractors performing work at the site to address emergencies. The EOP is designed to maximize human safety, limit damage to the environment, ensure safe operation of the site to the extent practicable, and address external and internal emergency communications and notifications. With respect to content and policies in the EOP, note that, since the last time the EOP was filed on March 3, 2023, the following sections and appendices in the EOP were updated: Section 1.0 to update titles, Appendix B to update contact information, and Appendix K to address staffing review. No other changes were made.

Sections and Page Numbers of EOP Corresponding to Requirements of Public Utility Commission of Texas Substantive Rule § 25.53

EOP Sections and/or Page Numbers	**PUCT Rule 25.53 Requirements**
Page 2 and Section 1.0	Approval and implementation section
Appendix O	Communication plan
Appendix Q	Plan to maintain pre-identified supplies for emergency response
Section 3.1 and Appendices C, K, and N	Plan addressing staffing during emergency response
Appendix K and Section 3.1	Plan addressing how entity identifies weather-related hazards
Appendix K	Weather emergency annex
Appendix M	Water shortage annex
Appendix J and Section 8.0	Restoration of service annex
Appendix N	Pandemic and epidemic annex
Not required	Hurricane annex, if required
Appendix P	Cyber security annex
Appendix I	Physical security incident annex

Record of Distribution

Name/Title	**Date of Access/Training**
Plant Manager	1/21/2025
Lead Technician	1/21/2025
Wind Technician III	1/21/2025
Wind Technician I	1/21/2025
Wind Technician III	1/21/2025

Emergency Contacts

Name	Contact Information
Primary contact: Renew Performance Monitoring Center ("RPMC") control center	480-424-1680
Back-up contact: Chase Bennett, Plant Manager	325-260-7050

Affidavit

Please see the attached affidavit.

AFFIDAVIT

I, Craig Cornelius, being duly sworn, state that I am the highest-ranking representative, official, or officer with binding authority over Ocotillo Windpower, LP ("Ocotillo"). In this position, I have personal knowledge of the facts stated herein, and I affirm that, to the best of my knowledge and belief:

(i) relevant operating personnel are familiar with and have received training on the applicable contents of the emergency operation plan ("EOP") of Ocotillo as reflected in this filing, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;

(ii) the EOP has been reviewed and approved by the appropriate executives;

(iii) drills have been, and will be, conducted to the extent required by Public Utility Commission of Texas Substantive Rule 25.53(f);

(iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed;

(v) there is a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and

(vi) designated personnel who interact with local, state, and federal emergency management officials during emergency events have received IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Signature: _____

Signatory Name: Craig Cornelius

Title: President

JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Francisco

Subscribed and sworn to (or affirmed) before me on
this 13th day of February, 20 25,

by Craig Cornelius

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature

PC02 S. KEY COMM. #2453572 NOTARY PUBLIC-CALIFORNIA SAN FRANCISCO COUNTY My Comm. Expires July 17, 2027 PC02

(Seal)

Clearway

OCOTILLO

EMERGENCY ACTION PLAN

Revision 7.0

Revision Control Summary:

Revision	Date	Description of change	Approved by	Content Owner
3.0	Approved 4/4/2022	Original version to comply with Public Utility Commission of Texas Substantive Rule § 25.53 requirements adopted in Project No. 51841 and effective 3/20/2022	[redacted]	[redacted]
4.0	Approved 8/29/2022	Section 1.0 and 7.0 and Appendix L modified	[redacted]	[redacted]
5.0	Approved 1/27/2023	Appendix B updated	[redacted]	[redacted]
6.0	Approved 5/21/2024	Appendix B updated	[redacted]	[redacted]
7.0	Approved 1/13/2025	Section 1.0 updated to revise titles Appendix B updated Appendix K update to address staffing	[redacted]	[redacted]

1.0 PURPOSE, SCOPE, APPROVAL, AND IMPLEMENTATION

This Emergency Action Plan (the Plan) provides an organizational structure and instructions for response to emergencies. It assigns roles and responsibilities for the implementation of the Plan during an emergency.

This Plan has been prepared to address emergencies affecting Clearway wind and solar facilities in a coordinated and systematic manner. The Plan is designed to maximize human safety, limit damage to the environment and ensure proper notification to regulatory agencies and company personnel. The Plan is formulated to comply with OSHA 29 CFR 1910.38.

Individuals responsible for implementing the Plan include all employees at the facility and any contractors performing work at the site. This procedure is a combined procedure for Clearway and employees of all companies are expected to follow this general procedure in response to emergencies at the facility.

The individuals responsible for maintaining the Plan, with the authority to change it, are the SVP, Operations, and Vice President, Operations; provided, however, that the Regional Manager or General Manager each have authority to modify the Plan to update site-specific information, including information in Appendix A and Appendix B.

This revision of the Plan supersedes previous revisions of the Plan. A revision control summary is included in the Plan and indicates the date this revision of the Plan was approved.

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2.0 DEFINITIONS AND ABBREVIATIONS

- **EMERGENCY** - An incident which requires a particular and coordinated response and is an eventwhich may require the mobilization and coordination of emergency services.
- **EMERGENCY RESPONSE** - A response effort by employees from outside the immediate release areaor by other designated responders to a release of an uncontrolled hazardous substance which presents the potential for a significant safety or health hazard.
- **EMERGENCY RESPONSE TEAM** or **ERT**- Site Management, Site Technicians and off-site Emergency Response personnel who have the delegated authority to act and make decisions as requiredduring emergencies in accordance with their defined roles and responsibilities
- **ERCOT** – Electric Reliability Council of Texas
- **EVACUATION** - To withdraw, in an organized manner, to a safe assembly area
- **HAZARDOUS MATERIAL**- A petroleum product or any hazardous substance which results or mayresult in adverse effects on the health or safety of employees who are exposed to it.
- **INCIDENT** - An undesired, unplanned and uncontrolled occurrence.
- **INCIDENT COMMANDER** – The person responsible for managing initial emergency response, establishing emergency objectives and activating components of the Emergency Response Team asneeded.
- **INCIDENT MANAGEMENT TEAM** – Persons, either on-site or off-site, that have skills and resourcesneeded to address a site emergency.
- **MEDEVAC** – Evacuation of casualties to the hospital in a helicopter or airplane
- **NATIONAL WEATHER SERVICE WARNING**-National Weather Service bulletin stating that severeweather has been sighted in the area
- **NATIONAL WEATHER SERVICE WATCH**-National Weather Service bulletin stating the possibilitythat severe weather could develop
- **NEAR-HIT** - An incident that did not result in an injury, illness, damage, environmental impact or operational loss. However, under slightly different circumstances the incident may have resulted inactual loss or has the potential to become an uncontrolled event if not treated.
- **NIMS** – National Incident Management System is a structure for management of large-scale ormulti-jurisdictional incidents.
- **O&M** – Operations and Maintenance.
- **OPUC** – Office of Public Utility Counsel, which is an organization created by the Texas Legislature to represent the interests of residential and small commercial consumers before the PUCT, state office of administrative hearings, state courts, and ERCOT
- **OSHA** – Occupational Safety and Health Administration
- **PPE** – Personal Protective Equipment
- **PUCT** – Public Utility Commission of Texas

- **RC** – Reliability Coordinator, which currently is ERCOT.
- **RISK MATRIX** - A Risk matrix is a matrix that is used during risk assessment to define the level of risk by considering the category of probability or likelihood against the category of consequence severity. This is a simple mechanism to increase visibility of risks and assist management decisionmaking.
- **RPMC** – Real-Time Performance Monitoring Center
- **SAFE ASSEMBLY AREA** - Designated areas located away from critical locations where employeescan find refuge in a serious or life-threatening situation.
- **SCADA** – Supervisory control and data acquisition (SCADA) is a control system architecture thatuses computers, networked data communications and graphical user interfaces for high-level process supervisory management
- [redacted]
- **SITE RISK REGISTER** – A register of site-specific hazards along with a hazard risk assessment and listof controls implemented to eliminate or mitigate each identified hazard.
- **SPCC** – Spill Prevention Control & Countermeasure Plan

3.0 ROLES AND RESPONSIBILITIES

3.1 Site Manager (or designee)

- Has overall responsibility to effectively implement all aspects of this plan.
- Ensure the Plan is readily available to site personnel or visitors.
- Ensure that all plant personnel with responsibilities defined in this Plan are properly trained, periodic drills are conducted, and that associated documentation (i.e., site-specific information document) is maintained. **Note that, in addition to a tower rescue drill at wind sites, a drill of the Plan must be conducted to test at least one of the appendices to the Plan, such as Appendix I, J, K, L, N, or P. Note that PUCT staff needs to be notified at least 30 days prior to the date of a drill, so please notify Electric Regulatory Compliance approximately six (6) weeks in advance of a drill.**
- Review this Plan annually (generally as part of annual site training or drills) and coordinate revisions, as necessary, consistent with Section 1.0. The available site-specific Information document copy shall reflect the most current emergency telephone numbers and modifications or changes.
- Act as the site liaison to emergency services personnel.
- [redacted]
- Ensure that adequate emergency alert notifications parameters are set up to provide early notification of incoming severe weather with high and low temperature notifications included.
- In the event of an emergency, perform the following:
  - Act as initial Incident Commander
  - Call or email the RPMC to indicate that the Plan has been activated and for what event
  - Direct initial response to the emergency situation
  - Issue orders for assembly at designated muster points as necessary
  - Ensure accountability assessment is performed to account for all site personnel.
  - Plan and coordinate staffing during emergency situations in order to keep the site operational in a safe manner
  - Issue Evacuation orders as necessary
  - Assist or coordinate the transportation of handicapped workers.
  - Assist with mobilization of supplies and equipment required during and after the emergency.
  - Issue back to work orders when emergency situation is over, and it is safe to return to work.

- Organize a de-brief meeting of all key personnel after each emergency to investigate,discuss, and review the response for continuous improvement opportunities.

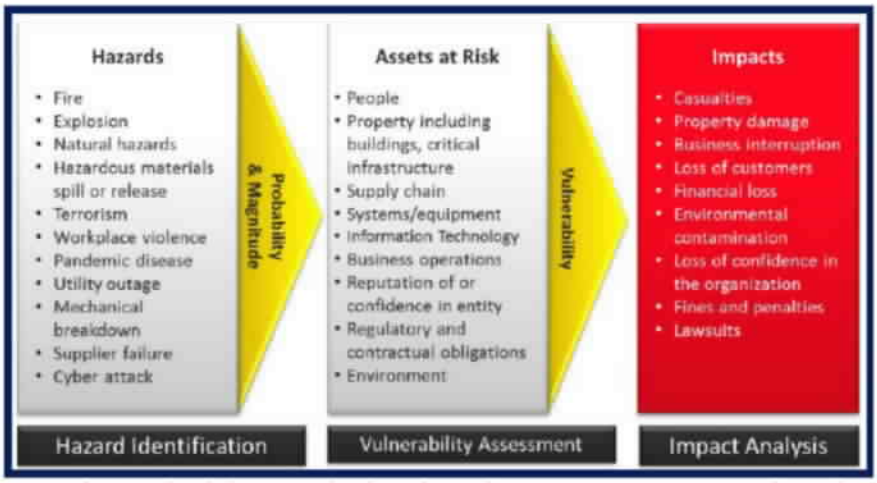
3.2 Site Personnel

- Inform the Site Manager of any emergency condition or situation as soon as all personnel aresecured from any immediate safety threat.
- Be familiar with the contents of this plan and applicable duties and functions.
  - Follow the instructions of the Site Manager for appropriate response actions.

4.0 HAZARD IDENTIFICATION AND RISK ASSESSMENT PROCESS

- It is impossible to foresee every conceivable circumstance under which an emergency can occur.For this reason, there are instances where this plan may have to be modified to fit a particular situation.
- This Plan is based upon an assessment of the potential risks arising from theOperations and Maintenance of the project (including the surrounding environment).

- The hazard identification and risk assessment process involve:
  - A review of "Project Risk Register" to identify potential Risks/Hazard/Threats;
  - An emergency risk assessment to identify and assess probable "high risk" incidents thatrequire a formal emergency response.



- The methodology applied to the risk assessment process is based on the use of a Risk Matrix, which defines the level of risk by considering the category of probability or likelihood against thecategory of consequence severity.

				Potential Consequences				
				C1	C2	C3	C4	C5
				Minor injuries or discomfort. No medical treatment or measurable physical effects	Injuries or illness requiring medical treatment. Temporary impairment.	Injuries or illness requiring hospital admission.	Injury or illness resulting in permanent impairment.	Fatality
				Not Significant	Minor	Moderate	Major	Severe
Likelihood	L5	Expected to occur regularly under normal circumstances	Almost Certain	Medium	High	Very High	Very High	Very High
	L4	Expected to occur at some time	Likely	Medium	High	High	Very High	Very High
	L3	May occur at some time	Possible	Low	Medium	High	High	Very High
	L2	Not likely to occur in normal circumstances	Unlikely	Low	Low	Medium	Medium	High
	L1	Could happen, but probably never will	Rare	Low	Low	Low	Low	Medium

5.0 REPORTING EMERGENCIES

- Notify the Site Manager of any site emergency. If appropriate call 911.
- The Site Manager will be the initial Incident Commander for all site emergencies
- Provide as much information regarding the emergency as possible, including the following:
  - Nature of the emergency
  - Information regarding any injury (number and condition)
  - Hazards that still exist
  - Location (address or GPS location)
  - Contact number

6.0 EMERGENCY INSTRUCTION AND SIGNAGE

- Suitable emergency signage to indicate firefighting equipment, site muster points, emergencyescape routes and exits shall be displayed and illuminated as necessary.
- Emergency instruction and warning signage shall be provided at the following locations or areas:
  - Emergency Action Plan information shall be posted throughout the site to inform personnel ofinformation and/or actions to take in the event of an emergency situation; and
  - Adequate and suitable emergency signage shall be posted, indicating location of fire points,first aid facilities, emergency assembly area, and exit and access routes.

7.0 SITE ASSEMBLY/MUSTER POINTS

- Each site shall be clearly defined with descriptions and maps indicating the initial and secondary assembly points. This information shall be provided to all employees, contractors and visitors on-site.
- [redacted]
- Some situations may require an assembly point to be designated at a location to be determined at the time of the incident based on current information, i.e., active shooter, bomb threat, tornado, etc.

8.0 EMERGENCY RECOVERY

Emergency recovery planning and activities shall commence while the actual emergency is still running. Where statutory investigations may need to be undertaken prior to the commencement of clean-up activities, a designated Emergency Response Team (ERT) representative shall only permit entry into the emergency site by authorized personnel.

Site access boundaries will be determined, enforced and continuously reassessed. Consideration will be given to allowing entry by personnel into those parts of the site not impacted by the emergency and found to be free of contamination.

The following shall also be considered during emergency recovery:

- Mobile equipment and machinery will be inspected and assessed to determine if it is safe forreturn to service.
- The site will be cleaned up, including the removal and disposal of damaged materials.
- Essential services (power, water, sewage etc.) will be restored.
- Reconstruction of infrastructure will be undertaken as required.
- Any contaminated materials must be contained, cleaned up and disposed of in accordance withlegislative requirements for hazardous materials. Temporary storage sites may need to be identified until contaminated materials can be removed from site.
- Environmental monitoring must be undertaken to determine the extent of any environmentalharm and be continued until it can be confirmed that all contamination has been cleaned up.
- A stand-down of the ERT shall not occur until recovery arrangements are in place. Progress reportsof recovery activities shall be communicated to Site Manager and other relevant stakeholders.
- If operation of the facility is affected by the emergency, the Site Manager will coordinate with siteO&M personnel, the connecting utility and ERCOT as required, regarding the facility and steps required to address operation of the facility going forward.

9.0 TRAINING

- Training shall be provided to all site personnel to ensure they understand their roles andresponsibilities in emergency action response.
- This training shall be provided initially during mandatory site safety orientation, annually orwhenever there are changes to the response plan.
- The following topics shall be covered in the training:
  - Overview of the Emergency Action Plan procedure;
  - Roles and responsibilities;
  - Locations of muster points (i.e. emergency assembly areas);
  - Pre-determined routes used to reach emergency assembly areas;
  - Procedures to follow in the event of specific emergency situations;
  - Locations of fire extinguishers and first aid kits;
  - Site emergency contact information; and
  - Details of equipment to be utilized during emergency situations – Alarm stations, air horns,two-way radios and firefighting equipment.
- Additional Training Requirements
  - The Site Manager and qualified designees shall take FEMA Incident Command Training, through the FEMA ICS and NIMS Course website.
  - Course Numbers and description for required training:
  - ICS-100 Introduction to the Incident Command System
  - ICS-200 ICS for Single Resources and Initial Action Incidents
  - IS-700 National Incident Management System: An Introduction
  - IS-800 National Response Framework: An Introduction

10.0 REFERENCES

- OSHA 29 CFR 1910.36, 1910.37, 1910.38(a)(b)(e), 94(d) (11) v, 120(q), 151, 157(g), 165, 252(c)(13)
- OSHA Principal Emergency Response and Preparedness
- California OSHA Title 8 3220
- Federal Emergency Management Agency (FEMA)
- American Red Cross
- US Department of Homeland Security
- PUCT Rule 25.53: https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.53.pdf

APPENDIX A – SITE MAP WITH DESIGNATED ASSEMBLY/MUSTER POINTS

[redacted]

APPENDIX B – SITE SPECIFIC EMERGENCY CONTACT INFORMATION

EMERGENCY CONTACT INFORMATION		
SITE NAME: Ocotillo Wind Power	[redacted]	
SITE GPS COORDINATES	[redacted]	
EMERGENCY CONTACTS	CALL 911	
	AMBULANCE	[redacted]
	HOSPITAL	[redacted]
	FIRE AND EMERGENCY SERVICES	[redacted]
SITE CONTACT INFORMATION	SITE MANAGER	[redacted]
	LEAD TECHNICIAN	[redacted]
	SR. MANAGEMENT	[redacted]
	REGIONAL MANAGER	[redacted]
	SAFETY	[redacted]
	ENVIRONMENTAL	[redacted]
OTHER CLEARWAY CONTACT INFORMATION	RPMC	[redacted]
	External Affairs	[redacted]
	Head of External Affairs, Midwest and Gulf Region	[redacted]
	External Affairs	[redacted]
	Director, Communications	[redacted]
ELECTRIC REGULATORY COMPLIANCE	[redacted]	[redacted]

APPENDIX C – GENERAL EMERGENCY RESPONSE

Once a site emergency has been declared, all personnel shall take the following actions:

STEP	ACTION
1	Safety stop work and secure work area if possible
2	Notify Site Manager to provide enough information to assist in incident/emergency evaluationand appropriate response.
3	As directed by the Site Manager, provide rescue assistance or support.
4	As appropriate call **911** or **another designated Emergency Services provider** based on emergency evaluation. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
5	If off-site Emergency Response personnel are required, the Site Manager shall coordinate withsite personnel to ensure access to the site and proper direction to appropriate location.
6	If instructed, report to the designated assembly/muster point unless the egress route to themuster area is not safe for travel. In such a case, proceed to an alternate muster point.
7	Remain calm, alert, and wait for further instructions
8	Listen carefully for your name to be called for accountability. If your name is not called, reportthis to the Person-in-Charge immediately.
9	Listen for the names of unaccounted workers. If possible, provide information regarding their last know location.
10	Remain in the assembly area until dismissed. Do not get into a car, leave the site, or wander outof your assembly area unless given an Evacuation Order or an ALL CLEAR/return to work authorization by site management.

APPENDIX D – INJURY RESPONSE

STEP	ACTION
1	Check the area and the injured party to determine the danger potential and the extent of the injury. Do not move a seriously injured victim unless there is an immediate danger
2	Notify the Site Manager of the injury, if appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact toensure prompt response.
3	If the injury is minor, treat with first aid.
4	If injury requires additional evaluation, Contact [redacted] to report the injury and for assistance in determining proper medical evaluation.
5	If the injury is determined to need additional medical attention, the Site Manager will make the appropriate notifications to designated Emergency Services provider.
6	If off-site Emergency Response personnel are required, the Site Manager shall coordinate withsite personnel to ensure access to the site and proper direction to the appropriate location.
7	Notify the Safety Department of the incident

Emergency Equipment Locations

[redacted]

APPENDIX E – CHEMICAL SPILL OR RELEASE

The intent of this Appendix is to provide information to address and mitigate the consequences of a spill orrelease that is immediately affecting personnel or environmental safety. For more comprehensive information and guidelines see the site-specific Spill Prevention Control and Countermeasure (SPCC) Plan.

Under normal activities at the site there should be no materials in use that represent an acutely hazardous ortoxic chemical exposure. Any activities that may involve such substances will require a response plan for the specific substances be developed before their use on the site is allowed.

STEP	ACTION
1	Notify the Site Manager of the spill or release. Provide as much of the following information aspossible:
	• Location
	• Substance spilled or released
	• Volume (approximate)
	• Extent of the spill or release
	• Threat to personnel, equipment or environment
	• Immediate assistance required
2	The Site Manager will notify the Environmental department to assist with spill evaluation asneeded.
3	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
4	If off-site Emergency Response personnel are required, the Site Manager shall coordinate withsite personnel to ensure access to the site and proper direction to ensure prompt response

APPENDIX F – HAZARDOUS MATERIALS SPILL OR RELEASE RESPONSE

A hazardous material is a substance that presents a physical or health hazard. A health hazard refers to a substance for which there is significant evidence that health effects may occur for exposed employees.

A Safety Data Sheet (SDS) is required for all hazardous substances in use at the Site. Site personnel will be provided with training on the safe use of all chemicals they will be exposed to.

The list of chemicals, regularly used at the Site, is located at the Site office.

STEP	ACTION
1	Assess the situation and direct all on-site personnel of immediate actions required to minimize exposure to personnel injury and to stabilize the situation.
2	Immediately notify the Site Manager. Provide as much information on as possible:
	• Location
	• Substance spilled
	• Volume (approximate)
	• Extent of the spill
	• Assistance required
	• Status of spill
	• Threat to watercourse
	• Threat to public
3	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
4	If off-site Emergency Response personnel are required, the Site Manager shall coordinate withsite personnel to ensure access to the site and proper direction to ensure prompt response
5	If necessary, the Site Manager will account for personnel by having them assemble at the Assembly/Muster Point except for any personnel required to respond to the incident
6	If necessary, the Site Manager will order a site evacuation and will designate site personnel to coordinate that evacuation.
7	If it is determined that emergency services are needed, the Site Manager will make the call andwill coordinate to escort the arriving emergency vehicles.
8	Notify Environmental and Safety of the incident

APPENDIX G – FIRE RESPONSE

STEP	ACTION
1	Notify Site Manager of fire. Provide your location, such as turbine number, block/array or site landmarks.
2	Provide status of victims, if any, and the affected areas of the fire. Move any victims to a safe areaif possible.
3	Alert others nearby to clear the affected area.
4	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
5	If off-site Emergency Response personnel are required, the Site Manager shall coordinate withsite personnel to ensure access to the site and proper direction to ensure prompt response.
6	Try to extinguish the fire **ONLY** if safe to do so and are trained to use a fire extinguisher or other firefighting medium or feel comfortable with extinguishing the fire.
7	All site personnel should maintain radio silence if not directly involved in the emergency to ensure ability of response personnel to communicate.
8	Upon hearing instructions from the Site Manager, proceed to the nearest assembly/muster point area and wait for further instruction.
9	Stay together and do not leave until 'ALL CLEAR' is given or further instruction is provided by site management.

APPENDIX H – BOMB OR TERRORISM THREAT RESPONSE

STEP	ACTION
1	If you receive a bomb or terrorism threat or discover a possible bomb or suspicious object(s) consider the treat real and immediately notify the Site Manager.
2	Utilize a "Bomb/Terrorism Threat Checklist" such as the one below to obtain as much information as possible regarding the treat.

This quick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with first responders and other stakeholders.

Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist.

If a bomb threat is received by phone

- Keep the caller on the line for as long as possible.
- Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities with information and await instructions.
- If possible, write a note to a colleague to call the authorities.
- Listen carefully. Be polite and show interest.
- Try to keep the caller talking to learn more information.
- If your phone has a display, copy the number and/or letters on the window display.
- Complete the Bomb Threat Checklist immediately. Write down as much detail as you can remember. Try to get exact words.
- DO NOT HANG UP, even if the caller does.

If a bomb threat is received by written note	If a bomb threat is received by e-mail/social media
• Call 911 • Notify building administrator • Handle note as minimally as possible • Do not remove threats from walls, mirrors, or other locations	• Call 911 • Notify building administrator • Do not delete the message

Signs of a suspicious package

- Excessive/Foreign/No/Non-cancelled postage
- Incorrect titles
- Misspelled words
- No return address
- Poorly handwritten or cut and paste lettering
- Protruding wires, foil, string, or tape
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Endorsements such as: "Fragile – Handle with Care," "Rush – Do not delay," "To be opened in the privacy of___."

Do not touch suspicious packages
Do not use two-way radios or cell phones

APPENDIX I – SABOTAGE AND PHYSICAL SECURITY INCIDENT APPENDIX

Sabotage of the site may take different forms and it would be impossible to define any and all sabotage thatcould occur. Sabotage by definition can be either cyber or physical. **All suspected cyber security events shall follow the procedures outlined in the Cyber Security Annex in Appendix P.**

STEP	ACTION
1	If sabotage has been identified or reported immediately notify the Site Manager.
2	The Site Manager will determine when and if it is safe for personnel to continue work and make appropriate notifications to site personnel based on initial information and site condition.
3	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
4	If off-site Emergency Response personnel are required, the Site Manager shall coordinate with site personnel to ensure access to the site and proper direction to ensure prompt response
5	The Site Manager shall notify appropriate law enforcement as necessary to investigate.
6	If sabotage resulted in creating and unacceptable safety risk, the affected equipment shall be shut down or affected area cleared and barricaded.
7	The Site Manager shall notify the Safety department.
8	The Site Manager shall consider whether the event is reportable in accordance with NERC Reliability Standard EOP-004 and Clearway's Event Reporting Operating Plan procedure.

APPENDIX J – ELECTRICAL SYSTEM EMERGENCIES AND RESTORATION OF SERVICE

Electrical system emergencies at the site and connected transmission systems may take many different formsand it would be impossible to define all system emergencies that could occur.

The Site Manager shall take all appropriate actions in coordination with the RPMC toevaluate system conditions, maintain or re-establish normal operations.

STEP	ACTION System Emergencies
1	Upon recognition of a system emergency, the Site Manager shall evaluate the emergency for safety risks and take immediate actions to protect personnel, plant equipment and property.
2	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
3	If off-site Emergency Response personnel are required, the Site Manager shall coordinate with site personnel to ensure access to the site and proper direction to ensure prompt response
4	Site Manager shall contact the appropriate Operations Center to provide system emergency information and determine any actions that need to be taken.
5	The Site Manager will work with RPMC to determine if any reporting requirementsexist.
6	The Site Manager will contact the Safety Department

STEP	ACTION Restoration of Service
1	After the System Emergency has cleared, it is safe to return to the site and return to normal operations.
2	Contact the RPMC to coordinate the site's Return to Service. Have the RPMC request information for any abnormal conditions that may still exist that may prevent the site returning to normal operation.
3	After approval is received from the RPMC, the site may proceed with returning to normal operation.
4	Make sure to note and document any abnormal conditions found upon return to the site.

APPENDIX K – NATURAL DISASTERS/SEVERE WEATHER

STEP	ADVERSE WEATHER PREPARATIONS
1	Identification of weather-related hazards: Sites will make use of the [redacted] to provide alerts on adverse and severe weather that will affect the site.
2	Cold weather: The Site Manager will take appropriate precautionary actions such as: • Prepare for the coming weather conditions. Take into considerations the recommendations provided by the National Weather Service and consider staffing needs and plans consistent with these identified precautionary actions. • Pick up and secure loose materials and equipment on site in anticipation of high winds. • Based on type and severity of severe weather, the Site Manager will notify site personnelof any potential actions required to be taken such as the need to shelter or site evacuation. • If site evacuation instructions are given, workers shall remain off-site until notified by theSite Manager that it is safe to return. • Ensure site vehicles are in good running condition • Ensure communications (phones and radios) are operating properly • In anticipation of severe cold, refer to Wind Chill charts and adjust outside work activity to limitworker exposure • Make sure adequate inventory is available to support normal cold weather repairs • Make sure site personnel have adequate cold weather PPE. • Ensure ERCOT has not issued any system alerts that would affect normal site activities. • For freeze conditions which would cause icing on wind turbine blades, refer to the Turbine IceHazards Risk Assessment procedure. • Make sure adequate ice melt is available. • Tire chains are available for trucks (as necessary). • Ensure Site teams are performing ice assessments of turbine blades. • Ensure ERCOT has not issued any system alerts that would affect normal site activities
3	Hot weather: The Site Manager will take appropriate precautionary actions such as: • Prepare for the coming weather conditions. Take into considerations the recommendations provided by the National Weather Service and consider staffing needs and plans consistent with these identified precautionary actions. • Based on type and severity of severe weather the Site Manager will notify site personnelof any potential actions required to be taken such as the need to shelter or site evacuation. • If site evacuation instructions are given, workers shall remain off-site until notified by theSite Manager that it is safe to return. • Ensure site vehicles are in good running condition • Ensure communications (phones and radios) are operating properly • Refer to the Clearway Heat Illness Prevention Plan

	• Make sure adequate water and ice is available • Make sure adequate inventory is available to support normal hot weather repairs • Ensure ERCOT has not issued any system alerts that would affect normal site activities
	NA – Verification of adequacy and operability of fuel switching equipment. None is installed or required at the site.

STEP	NATURAL DISASTERS (Tornado, Hurricane, Flooding)
1	Site Manager shall conduct an evaluation of the emergency to determine appropriate actions required to be taken.
2	The Site Manager's priority is to ensure the safety of site workers. This can include instructions to shelter or evacuate the site.
3	If site evacuation instructions are given, workers shall remain off-site until notified by the Site Manager that it is safe to return. Notify Safety and the Operations Center of evacuation.
4	Inspect the affected areas of the site to identify any damages. Report plant status and equipment damaged to Regional Manager, GM, and RPMC.
5	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
6	If off-site Emergency Response personnel are required, the Site Manager shall coordinate with site personnel to ensure access to the site and proper direction to ensure prompt response

STEP	EARTHQUAKE ACTIONS
1	If inside a building remain calm and don't rush outside. Protect your head and face. Stand in a doorway; take cover under a sturdy table, desk or move to an inner hallway. Stay away from tall fixtures and windows.
2	If outside stay away from fallen or downed electrical wires. Move away from high structures.
3	Once the ground has stopped shaking perform an accountability check to ensure all personnel are accounted for and there are no injuries.
4	Inspect the affected areas of the site to identify any damages. Report plant status and equipment damaged to Regional GM and Operations.
5	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.

6	If off-site Emergency Response personnel are required, the Site Manager shall coordinate with site personnel to ensure access to the site and proper direction to ensure prompt response

STEP	LIGHTNING
1	• Plant will monitor for lightning. In the event of lightning or thunderstorms in the area the site willimplement the following as appropriate: **50-mile band** – Serves as a warning threshold to incoming/nearby storm systems. Workmay continue as weather conditions are monitored. **30-mile band** – Serves as first action threshold. Once the 30-mile band is breached workers should begin to secure all tools and equipment and move downtower if workingin a wind turbine or, if at a solar site, leave the field. Site Manager may authorize some field work after evaluation of weather conditions (storm severity and movement) and appropriate riskassessment. **10-mile band** – Serves as final action threshold. All work is to immediately cease, andpersonnel shall seek shelter.
3	After the lightning event is over, conduct an assessment to determine that all personnel are accounted for and are injury free and that there is no other plant or equipment issues that require additional attention.
4	If appropriate call **911** or **another designated Emergency Services provider**. Refer to the Site Emergency Contact Information sheet for proper contact to ensure prompt response.
5	If off-site Emergency Response personnel are required, the Site Manager shall coordinate with site personnel to ensure access to the site and proper direction to ensure prompt response

APPENDIX L – ACTIVE SHOOTER/ TRESPASSING

STEP	ACTIVE SHOOTER ACTIONS
1	Active Shooter incidents are often over in 10 – 15 minutes, before law enforcement arrives. Site personnel must be prepared to respond mentally and physically to an active shooter situation. Typically, law enforcement is displaced for final resolution of the event. Personnel must be able to assist responding law enforcement without endangering themselves. Employees should remain in a safe or hide location until they have been notified it is safe to assembly at a muster point to be determined at that time.

HOW TO RESPOND

WHEN AN ACTIVE SHOOTER IS IN YOUR VICINITY

1. RUN

- Have an escape route and plan in mind
- Leave your belongings behind
- Keep your hands visible

2. HIDE

- Hide in an area out of the shooter's view
- Block entry to your hiding place and lock the doors
- Silence your cell phone and/or pager

3. FIGHT

- As a last resort and only when your life is in imminent danger
- Attempt to incapacitate the shooter
- Act with physical aggression and throw items at the active shooter

CALL 911 WHEN IT IS SAFE TO DO SO

HOW TO RESPOND

WHEN LAW ENFORCEMENT ARRIVES

- Remain calm and follow instructions
- Put down any items in your hands (i.e., bags, jackets)
- Raise hands and spread fingers
- Keep hands visible at all times
- Avoid quick movements toward officers such as holding on to them for safety
- Avoid pointing, screaming or yelling
- Do not stop to ask officers for help or direction when evacuating

INFORMATION

YOU SHOULD PROVIDE TO LAW ENFORCEMENT OR 911 OPERATOR

- Location of the active shooter
- Number of shooters
- Physical description of shooters
- Number and type of weapons held by shooters
- Number of potential victims at the location

APPENDIX M – WATER SHORTAGE

STEP	Shortage of Water
	NA – Water is not used to generate electricity at the site

APPENDIX N – PANDEMIC AND EPIDEMIC RESPONSE

A plant pandemic event is an epidemic or outbreak of infectious disease during which a substantial number orall of the facility O&M personnel may not be available to maintain continued site presence to support plant operations. As a result, Operations Management may, depending upon the situation, utilize any one or combinations of the following options below to attempt to ensure continuous and adequate service of the facility.

STEP	PANDEMIC RESPONSE ACTIONS
1	Facility management will utilize remote computer access via SCADA systems to operate and monitor site conditions.
2	Use of the RPMC to monitor and restart inverters or turbines (as applicable).
3	Use of Clearway personnel from other sites.
4	Use of third-party O&M Service providers.
5	If appropriate, request that O&M personnel remain either on site or off site to protect their health and safety as well as the health and safety of others.
6	Coordinate with federal, state, and local agencies concerning public health and safety measures formulated in response to a pandemic.
7	Operations Management will maintain regular communications with the TOP, BA, and RC through the RPMC the operations plan and status.

APPENDIX O – COMMUNICATION PLAN

I. Media and OPUC Communications

A. Plant personnel shall not make statements to, nor answer questions from media or OPUC personnel. Any questions directed to them, on or off the site, are to be referred to Clearway Energy External Affairs personnel.

B. A single location will be designated for the formation of escorted tours to visit areas of interest that are secure and approved by the Site Manager for observation. Unauthorized persons are not allowed onto the site until the emergency situation has been stabilized. It is extremely important that the plant entrance be kept clear for emergency response vehicles.

C. Since the media monitors the emergency radio frequencies, an emergency event may attract the media. Immediately notify the Site Manager, who can coordinate arrangements for a qualified spokesperson to release a press statement. Clearway Energy External Affairs contacts are identified in Appendix B.

II. ERCOT and PUCT Communications

Any communication to ERCOT (including in its capacity as RC) and PUCT shall be done through the RPMC (480-424-1680). Any communication should include a log of the date, time, identity of who was spoken with, and a description of the communication and any information relayed to the entity.

III. Local and State Government and State Emergency Operations Center Communications

Communication with local government entities, such as fire and police officials, and with state emergency operations centers should be done through the RPMC (480-424-1680). Communication with local government entities, such as fire and police officials, and with state emergency operations center shall be logged into the site's daily log. Any communication with state officials should be coordinated with the Head of External Affairs for the site's assigned region. Any communication with state officials should be entered into the site log.

IV. Fuel Suppliers

Not applicable. The site does not have any fuel suppliers supplying fuel to generate electricity at the site.

APPENDIX P – CYBER SECURITY APPENDIX

Reporting a Cybersecurity Incident In the event an individual is aware of a cybersecurity incident or even suspects a cybersecurity incident, immediate notification to the following people is required: *Specific contacts as of 4/1/2022:

Role	Contact Name	Phone Number	Email
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	
[redacted]	[redacted]	[redacted]	[redacted]

Detecting a Cybersecurity Incident The following table lists different kinds of cybersecurity events that could happen at a plant and when/how to report them

Category	Event Definition	Event Detection:
Physical Security Perimeter Compromise	Unauthorized access of a person or a device through circumventing or damaging the fences surrounding the site or doors to key site buildings	Unknown person or persons have breached the perimeter fence of the plant – seen in person or on camera Unknown person or persons are inside plant facilities and have accessed secure areas, doors, control systems, substation systems, etc.
Computer system compromise	Attempted or successful plant computer system compromise	Unusual behavior of plant control systems, HMIs, user workstations, &/or servers Takeover of plant control systems, HMIs, user workstations, &/or servers (for example, ransomware screen, anti-virus pop ups Loss of control from the RPMC
Information Theft or Loss	Unauthorized removal or loss of sensitive information from the plant or plant systems	Physical theft of plant information Information sent intentionally or inadvertently to the wrong person or entity
Unauthorized Modification	Unauthorized addition or modification of software or data	Installation of unauthorized software Installation of malicious software Unauthorized changing of system settings &/or configurations
Social Engineering	The attempt by an unauthorized person to manipulate people into performing actions or divulging information	Phishing emails Phone calls SMS messages Unusual websites or popups requesting information

APPENDIX Q – PRE-IDENTIFIED SUPPLIES FOR EMERGENCIES

STEP	Pre-Identified Supplies for Emergencies
1	Ensure that three days of emergency rations and water are available for on-site monitoring staff
2	Ensure that back-up power supply equipment is available and maintained.

APPENDIX R –ALTERNATIVE FUEL AND STORAGES CAPACITY

STEP	Summary of Alternative Fuel and Storage Capacity
1	NA – There are no alternative fuel storage capabilities for the site