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PEC Stapp

Emergency Operations Plan

QE Solar, LLC

GSPP

Company Name: Green Street Power Partners	**Job Name:** PEC Stapp
Job Address: 361 Phil Stapp Road, Junction, TX, 76849	
Nearest Intersection: N/A	
Latitude: 30.3560352	**Longitude**: -99.70975

Table of Contents

Executive Summary

1.0 Purpose

A. Overview

This plan is based on a detailed approach to emergency management, taking into consideration all hazards that could pose a safety risk. This Emergency Operations Plan was developed to enhance disaster response time and minimize disaster. The EOP contains concepts, policies, and procedures that apply to the emergency or disaster regardless of the nature or origin. It is not meant to address rare circumstances that result from an individual hazard. It does, however, provide a structure within which emergency operations staff and other related teams can work together to develop and maintain hazard-specific plans and procedures.

B. Purpose

The purpose of the Emergency Operations Plan (EOP) is to describe the crucial actions and obligations for emergency operations of the solar powered facilities in Texas. The goal of this EOP is to minimize the loss of life and damage to property and ensure safety to all project employees, emergency service members and local community.

C. Summary of 16 TAC 25.53 Requirements

EOP Section Title/Content	Page Number/Section	25.53 Rule Requirement
Purpose	Page 10, Section 1	(d)(1)(A)
Communication Plan	Page 16, Section 3	(d)(2)(B)
Plan to Maintain Pre-Arranged Emergency Supplies	Page 17, Section 4	(d)(3)
Emergency Staffing Plan	Page 18, Section 5	(d)(4)
Process for Activation of EOP	Page 25, Section 16.4	(d)(5)
Affidavit	Page 132	(c)(4)(C)
Drills	Page 21, Section 12	(g)

Emergency Contacts	Page 29, Attachment 2	(c)(4)(B)
Reporting	Page 24, Section 16	(g)
Hot Weather Emergency Annex	Page 89	(e)(2)(A)
Cold Weather Annex	Page 111	(e)(2)(B)
Emergency Plan Annex	Page 12	(e)(2)(C)
Pandemic and Epidemic Annex	Page 48	(e)(2)(D)
Hurricane Annex	Page 71	(e)(2)(E)
Cyber Security Annex	Page 61	(e)(2)(F)
Physical Security Incident Annex	Page 61	(e)(2)(G)

D. Record of Distribution

The following table provides the titles and names of persons in PEC Banks III's organization receiving access to the EOP and the dates of access, distribution, or training related to the EOP.

Name	Title	Access or Training	Date
Mike Butler	Director of O&M		
Aswanth Rajeev	Director of AM		
Claire Sweet	Commercial Assets Manager		
Anthony Tesi	Portfolio Lead		

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2.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

Introduction

This *Emergency Operations Plan* provides guidance and direction to PEC Stapp covering the Power Generation Company (PGC) emergency operations plan (EOP) requirements under
2.1 Chapter 25, Subchapter C, §25.53, of the Public Utilities Commission of Texas (PUCT) Electric Substantive Rules.

This EOP addresses the requirements in *(d) Information to be included in the emergency operations plan*. Within this and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the PEC Stapp Asset Manager.

Applicability

2.2

PEC Stapp is registering as a single PGC, registration #20652, with the PUCT and has created its emergency operations plan and all annexes. PEC Stapp is located in a hurricane evacuation zone (as defined by the Texas Division of Emergency management (TDEM) [1] and therefore has developed a Hurricane Annex plan along with this EOP.

2.3

Statements of §25.53 Non-Applicability

Section	Statement of Non-Applicability
(e)(2)(A)(ii) Adequacy and operability of fuel switching equipment	PEC Stapp does not have the capability to perform fuel switching and has no installed equipment to do so.
2.4 (e)(2)(B) Water Shortage Annex	PEC Stapp does not utilize water in the generation of electricity.

Generation Resource Information and Location

PEC Stapp is located in Junction, Texas and is interconnected to Pedernales Electric Cooperative Inc 18kV distribution system. QE Solar is the Generator Operator and the operations and maintenance (O&M) provider for the PEC Stapp.

[1] http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf

Facility	ERCOT Resource Name	Nameplate Rating	Commercial Operations Date (est.)
PEC Stapp	MB100N31SQ56S002 – Transformer	Nameplate Rating: 1000kVA	4/12/2021

B. Roles and Responsibilities

PEC Stapp Asset Manager

Role – PEC Stapp Asset Manager and owner of the EOP.

2.5

Responsibilities include:

2.5.1

2.5.2

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with PEC Bank's I business objectives and addresses requirements. The PUCT requires that this EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in the EOP are completed, in concert with the QE Solar Commercial Assets Staff.

2.6

- Reviews and approves the EOP annually.
- Maintains evidence.

2.6.1

QE Solar Commercial Assets Staff

2.6.2

Role – responsible for the team contracted to perform the O&M services at the PEC Stapp facility.

Responsibilities include:

- Ensure the requirements and processes laid out in the EOP are followed by site Personnel.
- Lead Field Services in the execution of the EOP and set expectations with Field Service Technicians for safe and reliability operational performance of the facility.

- Participate in the development and update of the EOP, under the leadership of the Asset Manager.
- Oversee the day-to-day operation of the PEC Stapp.
- Ensure annual drill requirements are met and submit evidence to PEC Stapp upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Asset Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to PEC Stapp by the end of each calendar year.
- Provide evidence to PEC Stapp Asset Manager upon completion and request.

QE Solar Field Service Technicians

2.7 Role – Contracted to perform the O&M services at the PEC Stapp facility.

2.7.1 Responsibilities include:

2.7.2

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Commercial Assets Staff and Asset Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-incident reviews.

2.8

2.8.1 QE Solar Operating Personnel

2.8.2 Role – The Generator Operator for the PEC Stapp facility.

Responsibilities include:

- Operates the PEC Stapp site from the QE Solar operations center in Springfield, NJ.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Provide notifications to ERCOT, QSE, Reliability Coordinator, etc. as required.
- Submit evidence to PEC Stapp Asset Manager upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

QE Solar Safety Manager Operating Personnel

Role – The Safety Manager for the PEC Stapp facility.

Responsibilities include:

2.9

2.9.1

2.9.2

- Must ensure that a Project-Specific Emergency Operations Plan (EOP) has been developed and that project management/supervision has been properly trained to implement the plan.
- Responsible for ensuring that appropriate employee health and OSHA records are maintained.
- Responsible for making this written plan available to employees.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

C. Revision Control Summary

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0	2/19/25	PEC Stapp, QE Solar O&M and Operator	New document at PGC Registration.

As of the Effective Date listed above, the current EOP supersedes and previous EOP.

D. Approvals

The approval signatures in this section indicate a review of the document and approval to publish. PEC Stapp most recently approved the EOP on the date indicated below.

Name	Date	Signature
Aswanth Rajeev	2/28/25	AR

3.0 COMMUNICATION PLAN

The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events must have

received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

The table below covers all of the entities that are required under (d)(2)(B) that PEC Stapp, as an entity with generation operations, may communicate with as applicable to its entity.

Entity	Statement of applicability for PGC	Communication Procedure
Media	PGC does not authorize communication with the media by PEC Stapp or its supporting personnel.	PGC does not authorize communication with the media by PEC Stapp or its supporting personnel. For media requests, please reach out to info@gspp.com
PUCT	PGC may need to respond to requests for information by commission staff.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Office of Public Utility Council (OPUC)	PGC is unlikely to need to respond to requests for information. For requests, please reach out to info@gspp.com	
Local & State Governmental Entities, officials, and emergency operations center	PGC may need to respond to requests for information.	Only those designated as emergency contacts with the PUCT are allowed to respond to requests.
Reliability Coordinator (RC)	The PGC may need to communicate with the RC, as requested, and per the ERCOT Protocols.	As described in the Roles and Responsibilities section of the EOP, only QE Solar Operating Personnel may communicate with the RC.

4.0 PLAN FOR PRE-IDENTIFIED SUPPLIES FOR EMERGENCY USE

Each of the annexes applicable to the PGC, including the *Cold Weather Annex*, *Hot Weather Annex*, and *Hurricane Annex,* contain a list of supplies that are unique to the content of the annex and are completed pre-season and/or pre-event. The plan for identifying and maintaining supplies is to utilize the checklists pre-and during season, as needed, to account for and stock supplies.

5.0 PLAN TO ADDRESS STAFFING DURING EMERGENCY RESPONSE

Each of the annexes applicable to the PGC contains a section for consideration of staffing during an event and, as appropriate, contains items to review and confirm staffing availability before (if possible) and during an event. Staffing during emergencies occurs on a case by case basis and will be evaluated by the Commercial Assets Staff to determine if staffing outside of normal levels is appropriate, safe, and warranted.

6.0 IDENTIFICATION OF WEATHER-RELATED HAZARDS (Reference Section 23, Severe Weather Planning and Identification)

Each of the annexes applicable to the PGC is built to identify weather-related hazards specific to its PGC. The annexes are built on site-specific data, including weather-related information provided by the State, County, and regional emergency managers, as well as a consideration of local conditions as documented and published online (e.g. the review of a county or city Hazard Mitigation Plan). See each annex for the identification of the sources used to identify hazards specific to its PGC.

7.0 PROCESS FOR ACTIVATING THE EOP

Upon determination that any of the events contained within the EOP are forecasted, imminent, or in-progress, the QE Solar Commercial Assets Staff shall activate the EOP and the appropriate annex(s).

8.0 CRITICAL FAILURE POINTS - EQUIPMENT

PEC Stapp has identified the following potential critical failure points and has planned remediation for each item, as noted.

Item	Quantity	Remediation
PE FS1050CU15 Inverter	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available.
1000KVA 18kV Transformer	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available.

9.0 BUSINESS CONTINUITY - CRITICAL FAILURE POINTS – PERSONNEL (STAFFING)

QE Solar and PEC Stapp have identified the following potential personnel critical failure points and has planned remediation for each role, as noted. There will be no additional staffing prior or during a severe weather events/conditions, but QE Solar is able to mobilize additional Field Services technicians, managers and/or contractors to supplement site team, as needed.

Role	Notes	Remediation
Field Technicians	Typically, three (3) regional field service technicians are available to support.	If all field technicians are unavailable, additional personnel may be dispatched, as approved by the Commercial Assets Staff, for relocation to supplement facility staffing.
Field Management	A regional field manager and director are available.	If the manager or director is unavailable, the other can support field operations leadership and decision-making.

10.0 SEVERE WEATHER PLANNING AND IDENTIFICATION

Events and disturbances that can occur in and around the facility include but are not limited to windstorms, severe thunderstorms, flooding, tornadoes, excessive heat, and hurricanes. These weather events can be detrimental to the employees and or equipment and structures at the facility. Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization annexes, to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those annexes.

10.1 Post-event, the Commercial Assets Staff and Field Services technicians will assess the damage and report the current generating capability of the site (priority for recovery of generation capacity) to QE Solar Operating Personnel.

Pre-season planning

Ahead of each summer and winter season, the Field Services Staff ensures that the appropriate weather annex and *Hurricane Annex* is reviewed, and the pre-season preparedness checklists

are completed, signed, and provided to the Commercial Assets Staff. Annual review of the checklists is documented and stored in specified database or information repository. This activity coincides with the required ERCOT reporting, per the Nodal Protocols. Checklists specific to the *Cold Weather Annex* and *Hot Weather Annex* are contained within those specific documents. For event response checklists for other scenarios, see the appropriate Attachment included in this EOP.

Seasonal events

10.2 Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Field Service Technicians and Operating Personnel are responsible for keeping abreast of forecasted severe weather events and reporting potential issues to the Commercial Assets Staff and has several means to monitor these weather-related emergencies, including:

- Internet access to weather-related websites;
- Onsite weather and telemetry systems;
- AM/FM radio to monitor local news;
- National Weather Service; and
- National Oceanic and Atmospheric Administration (NOAA)

Field Service Technicians have weather applications on their phones that are used for lightening and weather alerts. Additionally, site personnel will have two-way radios that receive NOAA weather alerts.

When information is received that a severe weather event such as a tornado, severely hot or cold weather, or a flood watch has been issued for the facility area, the following actions shall be taken:

1. The on-site Field Technicians should notify the Commercial Assets Staff.
2. 10.3 The Commercial Assets Staff or Operating Personnel shall determine whether or not the facility should be shut down due to the potential weather event(s).

The *Cold Weather Annex* and *Hot Weather Annex* contain the inventory of pre-arranged supplies needed for emergencies. These annexes are separate documents from this EOP.

Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the facility administrative building, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility and maintain communications with the Commercial Assets Staff, Operating Personnel, and others.

11.0 RESTORATION OF SERVICE

Failure to Start or Tripping Off-line

11.1 Upon generation facility failure to start or tripping off-line due to a hazard or threat, Field Service Personnel will begin the restoration by:

- Communicating with facility management, compliance personnel and QE Solar Operating Personnel to ensure all reporting requirements are being met;
- Determining the cause of the interruption generation output;
- Evaluating if the cause still exists or has subsided. If the cause still exists, then determining if it can be mitigated, isolated, or contained, so as to not impact generating facility operation.

Upon the determination that it is safe to reenergize the facility and commence generating power to the grid, Field Services Personnel will coordinate with QE Solar Operating Personnel to receive permission to come back online.

11.2

Response Time and Backup Power

The facility is constructed with an automatic transfer switch that connects normal station service power to a backup utility feed at the PEC Stapp facility that initiates when station service is lost. The site substation will have automatic failover power to the equipment in the substation via battery supplied DC power.

In the event of a power outage, the site will not be able to generate power, until a field service representative performs a site assessment and manually closes breakers. The target response

12.1 time for this scenario is two (2) hours after weather or safety conditions permit.

12.0 REQUIRED EMERGENCY OPERATIONS PLAN DRILL

Requirement for an Annual Drill and EOP Update

The PUCT requires that PEC Stapp conduct or participate in one or more drills each calendar year to test its EOP. Because PEC Stapp is in a hurricane evacuation zone (as defined by TDEM), at least one of the annual drills shall include a test of its *Hurricane Annex*.

Following an annual drill the entity must assess the effectiveness of its emergency response and revise its EOP, as needed. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

Notification to PUCT and TDEM District Coordinators Prior to Conducting Annual Drill

12.2 At least 30 days prior to the date of at least one drill each calendar year the following notifications must be made of the 1) date, 2) time, and 3) location of the drill.

- Commission staff must be notified (using the method and form prescribed on the commission's website).
- Appropriate TDEM District Coordinators, by email or other written form.

Drill Requirements

12.3

12.3.1 The content of each drill will be based on current needs and will be determined by the Commercial Assets Staff with input from the Asset Manager, as needed.

12.3.1.1 The annual drill must include a documented evacuation of the Facility.

12.3.2 A roster of drill attendees, the date the drill was conducted, and the location of the drill will be filed with this plan and retained in the PEC Stapp document repository.

12.3.3 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provide to the Asset Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

12.4

12.4.1

EOP Updates

12.4.2 Following the annual drill, the effectiveness of the drill and the EOP will be assessed and the EOP updated, as needed, based on feedback received and provided to the Asset Manager by the Commercial Assets Staff.

Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the PEC Stapp EOP evidence.

13.0 ANNUAL TRAINING AND REPORTING REQUIREMENT

The PUCT requires that all relevant operating personnel be 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 that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Contractors and visitors who will enter operating areas of the facility will be trained on facility alarms, mustering locations, and evacuation procedures before they enter the facility for the first time, and at least annually thereafter.

At the end of each calendar year, the QE Solar Commercial Assets Staff will notify the Asset Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and

2. Dates of access to or training on the EOP, as appropriate.

14.0 EMERGENCY CONTACT INFORMATION

PEC Stapp is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, PEC Stapp must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form. See *Resources and Related References* Section for Emergency Contact Annual Report and Form links.

15.0 REQUIRED ANNUAL PLAN UPDATE

The Filing Requirements in §25.53 required that information in this EOP and all supporting documents must be updated annually, and no later than March 15, for various circumstance, including, but not limited to the following:

- Changes were made in the previous calendar year that will materially affect how PEC Stapp would respond in an emergency.

- An entity that in the previous calendar year did not make a change that materially

- impacts how PEC Stapp would respond must also file with the PUCT.

16.0 REQUIRED REPORTING

Initial Submittal of Required EOP documents to PUCT at Registration as a PGC

16.1 The PUCT requires that PGC Register 30 days before beginning operations in Texas. A PGC is required to submit their emergency operations plan (and all other required documents) at PGC Registration, and that version may be redacted. PEC Stapp will make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.

Initial Submittal of Required EOP documents to ERCOT

16.2 If a PGC will operate in the ERCOT power region, the PUCT requires that at the time of the PGC Registration and submittal of the EOP to the commission, the PGC must submit an unredacted version of its emergency operations plan (and all other required documents). This submittal must be made no later than 10 days after the commission approved the PGC Registration.

Requirement to update EOP Information no later than March 15 Annually

16.3 PEC Stapp is required to continuously maintain its EOP and must annually updated information within the EOP no later than March 15.

16.3.1 <u>If EOP changes were made</u> in the previous calendar year that materially affects how PEC Stapp would respond to an emergency, the following items must be completed:

16.3.1.1 File an executive summary with the commission;

16.3.1.2 File a complete, revised copy of the EOP with all confidential portions removed; and

16.3.2

16.3.1.3 Submit to ERCOT the revised unredacted EOP it its entirety.

<u>If no EOP changes were made</u> in the previous calendar year that materially affect how it would respond to an emergency, the following items must be completed:

16.3.2.1 A pleading that documents any changes to the list of emergency contacts, as required;

16.3.2.2 An attestation stating that no changes were made to the EOP that material affects how it would respond to an emergency; and

16.3.2.3 The required affidavit.

If commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency, PEC Stapp will update the EOP and, if directed by commission staff, file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.

Reporting During Activation of the State Operations Center by TDEM

16.4 Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.

17.0 RESOURCES AND RELATED DOCUMENTS

PEC Stapp Hurricane Annex

PEC Stapp Cyber and Physical Security Incident Annex

PEC Stapp Pandemic and Epidemic Annex

PEC Stapp Hot Weather Annex

PEC Stapp Cold Weather Annex

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Update Form (posted under Emergency Management section)**:**
https://www.puc.texas.gov/industry/electric/forms/

18.0 SECTION 25.53 AND 25.55 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.

Term	Definition
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.
Energy storage resource	An energy storage system registered with ERCOT as an energy storage resource for the purpose of providing energy or ancillary services to the ERCOT grid and associated facilities controlled by the generation entity that are behind the systems point of interconnection, necessary for the operation of the system, and not part of a manufacturing process that is separate from the generation of electricity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Generation entity	An ERCOT-registered resource entity acting on behalf of an ERCOT- registered generation resource or energy storage resource.
Generation resource	A generator registered with ERCOT as a generation resource and capable of providing energy or ancillary services to the ERCOT grid, as well as associated facilities controlled by the generation entity that are behind the generator's point of interconnection, necessary for the operation of the generator, and not part of a manufacturing process that is separate from the generation of electricity.
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.
Inspection	Activities that ERCOT employees, commission staff, and designated contractors engage in to determine whether a generation entity is in compliance with all or parts of subsection (c) of this section or whether a TSP is in compliance with all or parts of subsection (f) of this section. An inspection may include site visits, assessments of procedures, interviews, and review of information provided by a generation entity or TSP in response to a request by ERCOT, including review of evaluations conducted by the generation entity or TSP or its contractor.

Term	Definition
Major weather-related forced interruption of service of a resource	The failure of a resource to start, following one or more attempts, for 12 or more continuous hours as a result of a weather emergency; or The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 12 or more continuous hours as a result of a weather emergency.
Repeated weather-related forced interruption of a service	Three or more of any combination of the following occurrences as a result of separate weather emergencies within any three-year period: (A) The failure of a resource to start; (B) The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 30 minutes or more; or (C) The loss or derate of 50% or more of a transmission facility's rating.
Resource	A generation resource or energy storage resource.
Summer season	June 1 to September 30 each year.
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.
Weather critical component	Any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as intended or, for a resource, is likely to lead to a trip, derate of more than five percent of the capacity represented in the resource's seasonal net maximum sustainable rating or of the transmission facility's rating, or failure to start.
Weather emergency	A situation resulting from a summer or winter weather event that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT issues an Emergency Notice to market participants involving an operating condition in which the safety or reliability of the ERCOT system is compromised or threatened by summer or winter weather.
Weather emergency preparation measures	Measures that a generation entity or TSP takes to support the function of a resource or transmission facility during a weather emergency.

Term	Definition
Winter season	December 1 to February 28 of the following year.

DISTRIBUTION LIST

Entity	Title	Name
QE Solar	QE Solar Commercial Assets Manager	Claire Sweet
QE Solar	Field Services Lead	Anthony Tesi
QE Solar	Operations Control Center Manager	Matt Bernard
QE Solar	Safety Manager of Technical Services	Alex Lasher
QE Solar	Field Technician	Larry Moore
GSPP	Director of AM	Aswanth Rajeev
GSPP	Director of O&M	Mike Butler

ATTACHMENT 1: DESIGNATION OF EMERGENCY COORDINATORS

The PEC Stapp Emergency Coordinator is responsible for specific actions detailed in this plan (as noted). Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

PEC Stapp Emergency Coordinators	
Primary Emergency Coordinator	Name: Mike Butler Title: Director of O&M Phone number: (513) 233-1501
Alternate Emergency Coordinator	Name: Aswanth Rajeev Title: Director of Asset Management Phone number: 203.585.8756
QE Solar Control Room Emergency Coordinators	
Primary Emergency Coordinator	Name: Matt Bernard Title: Control Center Manager Phone number: (908) 882-0766
Alternate Emergency Coordinator	Name: Title: Phone number: (908) 882-0766

ATTACHMENT 2: REAL-TIME EMERGENCY CONTACTS

In the event of a fire emergency, medical emergency, police emergency or weather-related emergency, ensure that the following roles are notified after emergency responders are contacted.

Title	Name	Phone Number	Can this person immediately address urgent request and questions from the PUCT during an emergency? (yes, no)
PEC Stapp Asset Manager			
QE Solar Commercial Assets Staff	Matt Trettin (Primary Contact)	(612) 875-9189	Yes
Operation Control Center Manager	Matt Bernard (Primary Contact)	(908) 882-0766	Yes
Operations Control Center		(908) 882-0766	Yes
Field Services Manager or Lead	Lee Allyn (Primary Contact)	(908) 956-0195	Yes

ATTACHMENT 3: PEC Stapp GENERAL EMERGENCY PROCEDURE

PEC Stapp Location for Outside Emergency Responders

Plant is located at	**361 Phil Stapp Road, Junction, TX, 76849**

General Emergency Procedures

This emergency plan was developed for the following plausible contingencies that could transpire at the facility:

1. Personnel injuries and serious health conditions
2. Fires
3. Chemical releases
4. Weather-related causes
5. Threats to the facility that warn of danger to personnel
6. Pandemics
7. Sabotage Reporting
8. Other unanticipated events

It will be the responsibility of the Commercial Assets Staff or Field Service Technicians to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages. In the event of an emergency, the following actions will be immediately performed:

If the event is a fire, medical, or police emergency, contact 911 immediately.

General Emergency Protocols

1. Any work-related permits in affect shall be immediately voided, and personnel involved in such work shall cease all activities onsite.

2. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.

3. Based upon the type and extent of the emergency, the Field Service Technician should assess whether an evacuation should be initiated. The following criteria should be considered in rendering a decision to conduct an evacuation of the facility:

    a. The affected parts of the facility and severity of the emergency.

b. Restrictions in egress routes caused by the emergency.

c. Wind direction (if the emergency involves gases/vapors)

d. People currently located at the facility (employees, visitors/contractors, etc.)

4. If the Commercial Assets Staff or Field Services Technician determines that a facility evacuation is necessary, s/he must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

a) Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel. ***In this type of evacuation, operating area personnel should evacuate without regard for shutdown of facility systems or for placing facility systems in the safest mode possible.*** This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

b) Delayed Site Evacuation

This type of evacuation would be used in a serious emergency situation where non-essential personnel (those not involved in facility operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility. The Commercial Assets Staff and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in facility operating areas to perform a controlled shutdown of the facility. ***If personnel will not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.***

***NOTE**: Although the Commercial Assets Staff or Field Service Technician (or Facility Emergency Coordinator) may initially designate an evacuation to be a Delayed Site Evacuation, s/he should always keep in mind that conditions may change rapidly and result in the need to call for an Immediate Site Evacuation.

5. The Commercial Assets Staff or Field Service Technician onsite will determine if an evacuation is necessary.

6. Evacuation will be coordinated via the two-way radios. Teams will be alerted is an evacuation has been directed. If an evacuation has been directed, the Commercial Asset Staff or Field Service Technician shall ensure that instructions for evacuation are communicated to personnel over the facility radio system or hand-held radios. These instructions should include the following items at a minimum:

    a. The type of evacuation to be performed

    b. Immediate Site Evacuation

    c. Delayed Site Evacuation

    d. The nature of the emergency

    e. The location(s) of the emergency

    f. Any egress routes that should not be used by evacuating personnel (if known and applicable)

7. If an evacuation has been ordered, personnel shall follow either the **Immediate Site Evacuation Procedures** or **Delayed Site Evacuation Procedures** contained in **Attachment 4**, as appropriate, and based upon the direction of the Commercial Assets Staff, Field Service Technician and/or Facility Emergency Coordinator.

8. Perform the appropriate follow-up procedure(s) below, based upon the type of emergency that is occurring:

    - Personnel Injuries/Health Conditions (Attachment 5)
    - Fire (Attachment 6)
    - Chemical/Oil Spills and Releases (Attachment 7)
    - Weather-related Emergencies (Section 9.0 in this document and within the appropriate annexes)

ATTACHMENT 4: EVACUATION PROCEDURES

Immediate Site Evacuation Procedure

1. Personnel present on-site shall immediately take the following actions:

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

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

    c) Gather at the front entrance gate at facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Attachment 3).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

   b) Proceed to the designated muster area.

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

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

Delayed Site Evacuation Procedures

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

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

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

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

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

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

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

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

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

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

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

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

d) Perform facility shutdown instructions as directed by the Field Service Technician.

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

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

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

b) Proceed to the designated muster area (see Site Map).

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

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

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

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

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

5. Persons-in-Charge

a) If the emergency escalates in severity or if there is immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in facility shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

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

Designated Muster Area	Site Entrance
Alternate Muster Area	No alternate areas available due to site location


Plant Perimeter
Plant Access Road
Plant Muster STation
S US Hwy 83
83

ATTACHMENT 5: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders. To prepare facility personnel for such contingencies, it will be the facility policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the facility at the designated location in the O&M building.

Note: Severe weather condition-related injuries are covered in the appropriate weather annexes.

Basic First Response Actions

- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
- *If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring the AED to the scene*. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions should be commenced.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim, and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, *do not attempt to move the victim*. Make the victim as comfortable as possible and

apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.

- Immobilize all injured parts of the victim.
- Prepare victim for transportation if the victim can be safely moved

Physical Shock

Symptoms

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

Electric Shock

Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

Treatment

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR and call for an AED, if required.

Burns

Symptoms

- Deep red color; or
- Blisters; or
- Exposed flesh.

Treatment

- Cooled immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

ATTACHMENT 6: FIRE RESPONSE PLAN

PEC Stapp maintains this fire response plan which describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of facility personnel and minimize damages to facility equipment and the surrounding environment.

1. Any person who discovers a fire in the facility should immediately make radio/phone contact with the Commercial Assets Staff or Field Service Technician, and provide the following information:

    a) That a fire has been discovered.

    b) The location and source of the fire.

    c) Any injuries that have occurred

    d) The cause of the fire (if known)

    e) Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

    NOTE: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a facility radio. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the **immediate action is to notify others over the radio and get help**.

2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire is in its incipient stage if it meets two primary criteria:

    a) The fire can be extinguished or controlled with a single portable fire extinguisher; and

    b) The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.

3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. ***Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only***. (Note: All field/facility personnel will be provided with

initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility. The *Fire Extinguisher Plot*, detailing the location of portable fire extinguishing equipment deployed at the facility, is provided at the end of this attachment.)

4. In response to the fire, the Field Service Technician will need to make the following determinations:

   a) The equipment or activities that need to be shut down and/or ceased.

   b) If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

5. In response to Fires, the Field Service Technician will perform the following:

   c) Supply Fire Department with SDS documentation

   d) If electrical equipment has not already been isolated, assist in doing so.

ATTACHMENT 7: CHEMICAL OR OIL SPILLS AND RELEASES

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that facility personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to facility personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA HAZWOPER regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) ***if it can be stopped without incurring additional personal exposure to the substance***. An example of this might be the following:

   Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area (if remaining within observation distance is safe under prevailing conditions; if in doubt, do not risk exposure – leave the area.).

3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Commercial Assets Staff or Field Service Technician should be notified immediately over the radio. Information provided should include all the following that are known:

   a) What type of chemical has been spilled/released?
   b) The location(s) of the spill/release.
   c) If the source of the spill/release has been stopped
   d) If any injuries or chemical exposure has occurred to personnel.
   e) Boundaries describing the area of the spill.
   f) Whether or not the spill is contained.
   g) Quantity released.
   h) Environmental Impacts (water bodies, streams, ground, roadways).

i) Refer to SDS sheets for chemical information

4. Based upon the report from the person discovering the spill, the Commercial Asset Staff or Field Service Technician shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. ***If a threat is imposed to the community or environment, 911 should be notified immediately.***

5. The Commercial Asset Staff or Field Service Technician shall decide as to whether the spill/release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the Commercial Assets Staff or Field Service Technician shall use the Spill Prevention Control and Countermeasure Plan (SPCC). The Commercial Assets Staff or Field Service Technician shall ensure that all required notifications are made.

6. While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any facility drains that are near the location of the spill. ***This should be performed only if it is safe to do so without risking chemical exposure***.

7. The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to avert others from inadvertently approaching the spill area. ***This should be performed only if it is safe to do so without risking chemical exposure.***

8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.

9. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the Commercial Assets Staff or Field Service Technician shall immediately proceed to the spill area to evaluate the severity of the incident. **NOTE: IF ANY PERSONNEL ARE DISCOVERED TO BE UNCONSCIOUS OR OTHERWISE INCAPACITATED UPON APPROACH TO THE SPILL SCENE, ALL PERSONNEL MUST IMMEDIATELY BACK AWAY TO A SAFE DISTANCE FROM THE UNKNOWN THREAT.**

10. The Commercial Assets Staff or Field Service Technician shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform). The adequacy or need for PPE should also be assessed. Upon completing this assessment, the Commercial Assets Staff or Field Service Technician shall notify/inform the Facility Emergency Coordinator of the status of the emergency.

11. Once the Commercial Assets Staff, Field Service Technician, or Emergency Coordinator, as appropriate, has determined that adequate containment and barricading of the spill area

exists, he/she shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill. This observer shall perform radio status checks a minimum of once every three minutes until outside responders arrive for cleanup/mitigation actions.

ATTACHMENT 8: THREATS TO THE FACILITY

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

Actions by the person receiving the threat:

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

The Commercial Assets Staff or Field Service Technician may consider any or all the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

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

ATTACHMENT 9: SABOTAGE REPORTING

1. **Dial 911**
2. Communicate the sabotage event to all on-site personnel via two-way radio.
3. Contact Control Center Personnel to report the sabotage and coordinate reporting.

PEC Stapp

Pandemic and Epidemic Annex

QE Solar, LLC

GSPP

Company Name: Green Street Power Partners	**Job Name:** PEC Stapp
Job Address: 361 Phil Stapp Road, Junction, TX, 76849	
Nearest Intersectionv: N/A	
Latitude: 30.3560352	**Longitude**: -99.70975

19.0 APPROVAL AND IMPLEMENTATION SECTION

E. Introduction

Introduction

This annex provides guidance and direction to PEC Stapp specific to pandemic and epidemic planning to address continuity and maintain essential functions and services during those
19.1 events.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the PEC Stapp Asset Manager.

F. Roles and Responsibilities

PEC Stapp Asset Manager

19.2

19.2.1 Role – PEC Stapp compliance manager and owner of the EOP.

19.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised Plan, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with PEC Stapp business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.

19.3

- Ensure the activities documented in this annex are completed, in concert with the Commercial Assets Staff.

19.3.1

- Maintains evidence.

QE Solar Commercial Assets Staff

Role – responsible for the team contracted to perform the O&M services at the PEC Stapp Facility.

Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Oversee the day-to-day operation of the PEC Stapp facility.
- Participate in the development and update of the EOP, under the leadership of the Asset Manager.
- Ensure annual drill requirements are met and submit evidence to PEC Stapp upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Asset Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to PEC Stapp upon completion and by the end of each calendar year.
- Provide evidence to PEC Stapp's Asset Manager upon completion and request.

19.3.2

19.4 QE Solar Field Service Technicians

19.4.1 Role – Contracted to perform the O&M services at the PEC Stapp Facility.

19.4.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Commercial Assets Staff and Asset Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-incident reviews.

19.5

19.5.1

19.5.2

QE Solar Operating Personnel

Role – The Generator Operator for the PEC Stapp facility.

Responsibilities include:

- Operates the PEC Stapp site from the QE Solar operations center in Springfield, NJ.

- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Provide notifications to ERCOT, QSE, Reliability Coordinator, etc. as required.
- Submit evidence to PEC Stapp upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

QE Solar Safety Manager Operating Personnel

19.6 Role – The Safety Manager for the PEC Stapp facility.

19.6.1 Responsibilities include:

19.6.2

- Must ensure that a Project-Specific Emergency Operations Plan (EOP) has been developed and that project management/supervision has been properly trained to implement the plan.
- Responsible for ensuring that appropriate employee health and OSHA records are maintained.
- Responsible for making this written plan available to employees.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

20.0 PANDEMIC THREAT LEVELS

The World Health Organization (WHO) defines a pandemic as a "worldwide spread of a new disease" where "the impact or severity tends to be higher…in part because of the much larger number of people…who lack pre-existing immunity to a new virus." Examples of recent pandemic events include the H1N1 pandemic in 2009-2010, the Zika virus pandemic in 2016, and the COVID-19-Coronavirus pandemic starting in 2019.

The pandemic threat levels are based on the WHO and US National Alert Stages and have been modified to fit PEC Stapp. The pandemic threat levels are based on the level of person-to-person transmission and how widespread the disease is in humans, as measured in the US transmittal rates. Planning and response measures are based on the pandemic threat level. PEC Stapp will consult with WHO, the Center for Disease Control (CDC), and the local and state health departments. Attachment 1 contains the Federal Government Response Stages matrix.

Level 0 – Awareness	No documented cases of person-to-person transmission.
Level 1 – Cautionary	Documented person-to-person transmission is rare.
Level 2 – Serious	Limited documented person-to-person transmission (Small Cluster).

Level 3 – Severe	Evidence of widespread person-to-person spread (larger or multiple clusters identified in the US) **AND** Limited person-to-person spread within city.
Level 4 – Critical	Increasing and sustained person-to-person transmission **AND** Multiple clusters of cases identified in two (2) or more countries or regions.

21.0 CRISIS TEAM

To facilitate PEC Stapp response to a pandemic, PEC Stapp will establish a cross-functional crisis team comprised of representatives of Human Resources, Corporate Communications, PEC Stapp, QE Solar Operations and Maintenance personnel, and others, as needed. The Asset Manager, and Commercial Assets Staff will jointly lead the team, which is charged with evaluating relevant information, assessing impact to PEC Stapp operations, developing appropriate responses to actual and potential developing threat, and communicating per established periodicities with staff.

22.0 PANDEMIC DISEASE CONTAINMENT/CONTROL STRATEGIES

Government and health departments will publish the actions they're taking to implement disease containment strategies. PEC Stapp will use this published information and factor the potential impacts on both business and Bulk Power System operations. PEC Stapp may choose to implement any number of containment strategies and to recommend these strategies to their personnel, as appropriate. Strategies may include the following:

- **Isolation** - Separation of persons with specific infectious illnesses in their homes, in hospitals, or in designated healthcare facilities.
- **Quarantine** - Separation and restriction of the movement while not yet ill, have potentially been exposed to an infectious agent.
- **Social Distancing** - Social distancing measures could take the form of: modifying the frequency and type of face-to-face employee encounters (e.g., placing moratoriums on hand-shaking, substituting teleconferences for face-to-face meetings, staggering breaks, posting infection control guidelines); establishing flexible work hours or worksite; and implementing strategies that request and enable employees to stay home at the first sign of symptoms.

The use of these strategies, along with enhanced hygiene etiquette and the cancellation of non-essential activities to reduce the potential for transmission rates, will be evaluated for use throughout the duration of the pandemic event.

23.0 ESSENTIAL ROLES AND PERSONNEL

Given the expected duration and potential multiple waves of pandemic outbreaks and the extended toll it may take on personnel and their families (which may reduce PEC Stapp personnel availability), the crisis team must review the processes involved in carrying out essential roles and services in order to develop plans that mitigate the effects of the pandemic, while simultaneously allowing the continuation of operations which support essential functions. The following essential roles and services have been identified as needed to sustain operations during a pandemic, which may span multiple months. Other Roles may be added to this table as necessary during an event.

Role	Personnel Name	Continuously critical or event-driven critical?	Notes
Regional Field Director	Lee Allyn	Continuously	Multiple site techs are available for support if this role is unavailable.
Asset Manager	Mike Butler	Continuously	
Control Center Manager	Matt Bernard	Continuously	Control Center Lead and/or Utility Director can support if CC Manager is unavailable.

24.0 PLANNING ASSUMPTIONS

Listed below are the overarching organizational planning assumptions.

- Federal, State, and Local government will provide guidance and/or direction regarding current pandemic status.
- PEC Stapp will evaluate all available information published during a pandemic to determine appropriate response and actions.
- PEC Stapp facility will be accessible, but right of entry may be limited to essential personnel.
- Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.

- Travel restrictions, such as limitations on mass transit, implemented at the Federal, State, tribal, territorial, and local levels may affect the ability of some staff to report to work.

- Additional funding will be budgeted for the acquisition of additional equipment, whether Personal Protective Equipment (PPE) or other equipment identified during an event (e.g. face mask, cleaning supplies and test kits as applicable).

25.0 RESOURCES AND RELATED DOCUMENTS

PEC Stapp Emergency Operations Plan

Centers for Disease Control

Pandemic resources webpage: https://www.cdc.gov/flu/pandemic-resources/index.htm

National Strategy Planning webpage:

https://www.cdc.gov/flu/pandemic-resources/planning-preparedness/national-strategy-planning.html

NERC COVID-19 webpage: https://www.nerc.com/news/Pages/COVID-19.aspx

World Health Organization

https://www.who.int/emergencies/diseases/en/

Health and Human Services

- **Pandemic Influenza Preparedness Response and Recovery Guide for Critical Infrastructure and Key Resources**

https://asprtracie.hhs.gov/technical-resources/resource/1978/pandemic-influenza-preparedness-response-and-recovery-guide-for-critical-infrastructure-and-key-resources

Texas Health and Human Services – Health Alerts & Advisories webpage:
https://dshs.texas.gov/news/alerts.aspx

Region 8 State Health Department webpage

https://www.dshs.texas.gov/idps-investigation-forms/disease-reporting-contacts/real-county-disease-reporting

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

26.0 SECTION 25.53

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
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.
Energy storage resource	An energy storage system registered with ERCOT as an ergery storate resource for the purpose of providing energy or ancillary services to the ERCOT grid and associated facilities controlled by the generation entity that are behind the systems point of interconnection, necessary for the operation of the system, and not part of a manufacturing process that is separate from the generation of electricity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Generation entity	An ERCOT-registered resource entity acting on behalf of an ERCOT-registered generation resource or energy storage resource.
Generation resource	A generator registered with ERCOT as a generation resource and capable of providing energy or ancillary services to the ERCOT grid, as well as associated facilities controlled by the generation entity that are behind the generator's point of interconnection, necessary for the operation of the generator, and not part of a manufacturing process that is separate from the generation of electricity.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment,

Term	Definition
	or property, including a condition that is potentially harmful to the continuity of electric service.
Inspection	Activities that ERCOT employees, commission staff, and designated contractors engage in to determine whether a generation entity is in compliance with all or parts of subsection (c) of this section or whether a TSP is in compliance with all or parts of subsection (f) of this section. An inspection may include site visits, assessments of procedures, interviews, and review of information provided by a generation entity or TSP in response to a request by ERCOT, including review of evaluations conducted by the generation entity or TSP or its contractor.
Major weather-related forced interruption of service of a resource	The failure of a resource to start, following one or more attempts, for 12 or more continuous hours as a result of a weather emergency; or The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 12 or more continuous hours as a result of a weather emergency.
Repeated weather-related forced interruption of a service	Three or more of any combination of the following occurrences as a result of separate weather emergencies within any three-year period: (D) The failure of a resource to start; (E) The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 30 minutes or more; or (F) The loss or derate of 50% or more of a transmission facility's rating.
Resource	A generation resource or energy storage resource.
Summer season	June 1 to September 30 each year.
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.
Weather critical component	Any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as intended or, for a resource, is likely to lead to a trip, derate of more than five percent of the capacity represented in the resource's seasonal net maximum sustainable rating or of the transmission facility's rating, or failure to start.

Term	Definition
Weather emergency	A situation resulting from a summer or winter weather event that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT issues an Emergency Notice to market participants involving an operating condition in which the safety or reliability of the ERCOT system is compromised or threatened by summer or winter weather.
Weather emergency preparation measures	Measures that a generation entity or TSP takes to support the function of a resource or transmission facility during a weather emergency.
Winter season	December 1 to February 28 of the following year.

DISTRIBUTION LIST

Entity	Title	Name
QE Solar	QE Solar Commercial Assets Manager	Claire Sweet
QE Solar	Field Services Lead	Anthony Tesi
QE Solar	Operations Control Center Manage	Matt Bernard
QE Solar	Safety Manager of Technical Services	Alex Lasher
QE Solar	Field Technician	Larry Moore
GSPP	Director of AM	Aswanth Rajeev
GSPP	Director of O&M	Mike Butler

APPROVALS

The approval signatures in this section indicate review of the document and approval to publish.

Name	Date	Signature
Aswanth Rajeev	2/28/2025	AR

Name	Date	Signature

REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0		PEC Stapp, QE Solar O&M and Operator	New plan at PGC registration. This version supersedes previous EOP versions.

ATTACHMENT 1: WHO PHASES AND GOVERNMENT RESPONSE STAGES

Taken from *Pandemic Influenza: Preparedness, Response, and Recovery; Guide for Critical Infrastructure and Key Resources* (*https://www.dhs.gov/sites/default/files/publications/cikrpandemicinfluenzaguide.pdf*)

WHO Phases		Federal Government Response Stages	
INTER-PANDEMIC PERIOD			
1	No new influenza virus subtypes have been detected in humans. An influenza virus subtype that has caused a human infection may be present in animals. If present in animals, the risk of human disease is considered to be low.	0	New domestic animal outbreak in at-risk country
2	No new influenza virus subtypes have been detected in humans. However, a circulating animal influenza subtype poses a substantial risk of human disease.		
PANDEMIC ALERT PERIOD			
3	Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.	0	New domestic animal outbreak in at-risk country
		1	Suspected human outbreak overseas
4	Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.	2	Confirmed human outbreak overseas
5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).		
PANDEMIC PERIOD			
6	Pandemic phase: increased and sustained transmission in general population.	3	Widespread human outbreaks in multiple locations overseas
		4	First human case in North America
		5	Spread throughout United States
		6	Recovery and preparation for subsequent waves

ATTACHMENT 2: PANDEMIC PLANNING CHECKLIST

Instructions: Use this checklist to start the planning and response processes. Add items, as needed.

Evaluate	
Check when complete	**Item**
	Identify and gather members of the Pandemic Crisis Team
	Collect information on the status of pandemic from trusted and verified sources.
	Evaluate the need to obtain and distribute additional Personal Protective Equipment (PPE)
	Determine potential impacts to staffing

Communicate	
Check when complete	**Item**
	Provide guidance to personnel on personal contact policy and protective measures
	Communicate staffing changes for pre-determined period to prevent spread, contain infection, etc.
	Establish a set schedule for communications

PEC Stapp

Cyber and Physical Security Annex

QE Solar, LLC

GSPP

Company Name: GSPP	**Job Name:** PEC Stapp
Job Address: 361 Phil Stapp Road, Junction, TX, 76849	
Nearest Intersection: N/A	
Latitude: 30.3560352	**Longitude:** -99.70975

27.0 APPROVAL AND IMPLEMENTATION SECTION

G. Introduction and Applicability

Introduction

27.1 This annex provides guidance and direction to PEC Stapp specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the PEC Stapp Asset Manager.

H. Roles and Responsibilities

27.2 PEC Stapp Asset Manager

27.2.1 Role – PEC Bank's I Asset Manager and owner of the EOP.

27.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with PEC Bank's I business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Commercial Assets Staff.
- Maintains evidence.

QE Solar Commercial Assets Staff

Role – responsible for the team contracted to perform the O&M services at the PEC Stapp Facility.

27.3 Responsibilities include:

27.3.1
- Ensure the requirements and processes laid out in the EOP are followed by site Personnel.

27.3.2
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliable operational performance of the Facility.
- Oversee the day-to-day operation of the PEC Stapp facility.
- Participate in the development and update of the EOP, under the leadership of the Asset Manager.
- Ensure annual drill requirements are met and submit evidence to PEC Stapp upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Asset Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to PEC Stapp upon completion and by the end of each calendar year.
- Assist in evaluation and escalation of potential incidents.
- Provide evidence to PEC Stapp Asset Manager upon completion and request.

27.4

27.4.1 **QE Solar Field Service Technicians**

27.4.2 Role – Contracted to perform the O&M services at the PEC Stapp Facility.

Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Provide feedback on potential impact(s) to operations of an incident and proposed responses.

27.5
- Participate in responses to emergency events at the PEC Stapp facility.

27.5.1
- Assist in evaluation and escalation of potential incidents.

27.5.2
- Participate in training, and drills, and post-incident reviews.

QE Solar Operating Personnel

Role – The registered Generator Operator (GOP) for the PEC Stapp facility.

Responsibilities include:

- Operates the PEC Stapp site from the QE Solar operations center in Springfield, NJ.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Provide notifications to ERCOT, QSE, Reliability Coordinator, etc. as required.
- Submit evidence to PEC Stapp upon completion and request.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

Security Services Provider (MSSP)

27.6 Role — Administrator of the security activities and controls for the Facility.

27.6.1 Responsibilities:

27.6.2

- If Initial Discoverer, fulfill role as described.
- Analyze potential and suspected Cyber Security Incidents and provide technical, containment, and remediation guidance.
- Provide evidence related to Cyber Security Incidents.
- Participate in post-incident reviews

28.0 INCIDENT IDENTIFICATION

28.1

Identification of Abnormal Conditions and Potential Indicators of a Cyber Security or Physical Security Incident

The first person to become aware of an abnormal condition will report to their appropriate internal contact (e.g., Commercial Assets Staff, IT, etc.) for review, identification, and for determining if the incident warrants escalation.

The primary activities in the incident identification phase are the following:

1. Review events, alarms, and indicators of compromise;
2. Gather evidence, interview involved parties (if needed); and
3. Analyze information gathered to determine if an incident has occurred, and if further evaluation is needed.

It is important to be aware that seemingly unrelated cyber and physical events may be related; be cautious to not draw conclusions before analysis and communications have been conducted.

The information below is intended to provide guidance for determining if an incident warrants further evaluation.

A. Physical indicators of a potential Cyber Security or Physical Security Incident

Indicators include, but are not limited to:

28.1.1

- Physical security alarms or obvious signs of intrusion (e.g., cut fencing, broken locks, pry marks, etc.);
- Unescorted, unauthorized visitors within a BES Cyber Systems perimeter;
- Unusual vehicles at the perimeter of or in the Facility;
- Any suspicious packaging, unknown equipment, unexplainable changes to wiring; or
- Loosened fasteners found in patterns or in high numbers.

B. Cyber indicators of a potential Cyber Security Incident

Indicators include, but are not limited to:

28.1.2

- Unexplained changes in the availability or unavailability of a service;
- Software performance, increased command latency;
- Software crashes and data-base corruptions;
- Changes in software behavior (such as reset commands performing an alarm test);
- Line, bus, or transformer relay actions with no indicated fault targets or unusual combinations of fault targets;
- Remote Terminal Unit (RTU) or other abnormal communications failures;
- Social engineering efforts directed at Personnel;
- Unexplained use of privileged accounts;
- Accounting discrepancies;
- Suspicious, unusual, or excessive unsuccessful login attempts;
- Unexplained new user accounts;
- Unstable systems or system crashes;
- Poor or inconsistent system response time;
- USB sticks, drives, or devices found connected to Cyber Systems;

29.1

- Changes in wiring; and
- Physical disturbances (e.g., open panels, broken tamper tape).

29.0 INCIDENT ESCALATION, INVESTIGATION AND REPORTING

Escalation

Upon receipt of notification from Field Service Technicians or Operating Personnel, the Asset Manager and notifying personnel will coordinate the investigation and reporting of the suspected incident to the appropriate stakeholders in the reporting process.

Investigation

29.2 The Asset Manager, along with subject matter experts, Operating Personnel, Field Service Technicians, and other support staff, will ensure that the potential event is investigated and reported within all required timelines (e.g. NERC, ERCOT, Federal).

Reporting

29.3 In coordination with Operating Personnel and subject matter experts, the Asset Manager or their designee will determine if there any reporting is required for the incident.

29.3.1 Personnel involved in the response to an incident will be notified by the Compliance Manger or their designee of any submittals that were made.

29.3.2 Operating Personnel will notify and coordinate with Field Technician until the end of the Reportable Event.

29.3.3 If the event is determined to not meet the reporting threshold, Operating Personnel will coordinate the collection of all appropriate evidence with Field Technician and submit to PEC Stapp for evidence retention.

30.0 RESOURCES AND RELATED DOCUMENTS

PEC Stapp Emergency Operations Plan

ERCOT

Current Protocols - Nodal: https://www.ercot.com/mktrules/nprotocols/current

- **Section 16: Registration and Qualification of Market Participants**
- **Section 23 Form E, Notice of Change of Information:**
- **Section 23 Form O, Notice of Cybersecurity Incident**

Current Nodal Operating Guides: https://www.ercot.com/mktrules/guides/noperating/current

- **Section 3: ERCOT and Market Participant Responsibilities**

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Update Form (posted under Emergency Management section)**:**
https://www.puc.texas.gov/industry/electric/forms/

31.0 SECTION 25.53 AND 25.55 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
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.
Energy storage resource	An energy storage system registered with ERCOT as an energy storage resource for the purpose of providing energy or ancillary services to the ERCOT grid and associated facilities controlled by the generation entity that are behind the systems point of interconnection, necessary for the operation of the system, and not part of a manufacturing process that is separate from the generation of electricity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Generation entity	An ERCOT-registered resource entity acting on behalf of an ERCOT-registered generation resource or energy storage resource.
Generation resource	A generator registered with ERCOT as a generation resource and capable of providing energy or ancillary services to the ERCOT grid, as well as associated facilities controlled by the generation entity that are behind the generator's point of interconnection, necessary for the operation of the generator, and

Term	Definition
	not part of a manufacturing process that is separate from the generation of electricity.
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.
Inspection	Activities that ERCOT employees, commission staff, and designated contractors engage in to determine whether a generation entity is in compliance with all or parts of subsection (c) of this section or whether a TSP is in compliance with all or parts of subsection (f) of this section. An inspection may include site visits, assessments of procedures, interviews, and review of information provided by a generation entity or TSP in response to a request by ERCOT, including review of evaluations conducted by the generation entity or TSP or its contractor.
Major weather-related forced interruption of service of a resource	The failure of a resource to start, following one or more attempts, for 12 or more continuous hours as a result of a weather emergency; or The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 12 or more continuous hours as a result of a weather emergency.
Repeated weather-related forced interruption of a service	Three or more of any combination of the following occurrences as a result of separate weather emergencies within any three-year period: (G) The failure of a resource to start; (H) The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 30 minutes or more; or (I) The loss or derate of 50% or more of a transmission facility's rating.
Resource	A generation resource or energy storage resource.
Summer season	June 1 to September 30 each year.
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.

Term	Definition
Weather critical component	Any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as intended or, for a resource, is likely to lead to a trip, derate of more than five percent of the capacity represented in the resource's seasonal net maximum sustainable rating or of the transmission facility's rating, or failure to start.
Weather emergency	A situation resulting from a summer or winter weather event that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT issues an Emergency Notice to market participants involving an operating condition in which the safety or reliability of the ERCOT system is compromised or threatened by summer or winter weather.
Weather emergency preparation measures	Measures that a generation entity or TSP takes to support the function of a resource or transmission facility during a weather emergency.
Winter season	December 1 to February 28 of the following year.

DISTRIBUTION LIST

Entity	Title	Name
QE Solar	QE Solar Commercial Assets Manager	Claire Sweet
QE Solar	Field Services Lead	Anthony Tesi
QE Solar	Operations Control Center Manage	Matt Bernard
QE Solar	Safety Manager of Technical Services	Alex Lasher
QE Solar	Field Technician	Larry Moore
GSPP	Director of AM	Aswanth Rajeev
GSPP	Director of O&M	Mike Butler

APPROVALS

The approval signatures in this section indicate review of the document and approval to publish.

Name	Date	Signature
Aswanth Rajeev	2/28/2025	AR

REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0		PEC Stapp, QE Solar O&M and Operator	New document at PGC registration.

PEC Stapp

Hurricane Annex

QE Solar, LLC

GSPP

Company Name: Green Street Power Partners	**Job Name:** PEC Stapp
Job Address: 361 Phil Stapp Road, Junction, TX, 76849	
Nearest Intersection: N/A	
Latitude: 30.3560352	**Longitude**: -99.70975

32.0 APPROVAL AND IMPLEMENTATION SECTION

C. Introduction and Applicability

Introduction

32.1 This annex provides guidance and direction to PEC Stapp specific to the preparation for hurricane and tropical storm events, and post storm return to normal operations (as required) response. This annex shall be used in conjunction with the *Hot Weather Annex* and the *Cold Weather Annex*.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the PEC Stapp Compliance Manager.

D. Roles and Responsibilities

32.2 **PEC Stapp Compliance Manager**

32.2.1 Role – The PEC Stapp compliance manager and owner of the EOP.

32.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with PEC Bank's I business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents are continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Commercial Asset Staff.
- Reviews and approves the EOP annually.
- Maintains evidence.

QE Solar Commercial Assets Staff

Role – the manager of the team contracted to perform the O&M services at the PEC Stapp Facility.

32.3 Responsibilities include:

32.3.1
- Ensure the processes documented in the EOP are followed by all site personnel.

32.3.2
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-hurricane and tropical storm season review activities have been complete.
- Oversee the day-to-day operations of the PEC Stapp facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hurricane preparation needs or deficiencies.
- Notify the Compliance Manager of hurricane preparation tasks progress, scheduling, or concerns with meeting deadlines
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to PEC Stapp upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to PEC Stapp upon completion and by the end of each calendar year.

32.4
- Provide evidence to PEC Stapp Compliance Manager upon completion and request.

32.4.1

32.4.2

QE Solar Field Service Technicians

Role – Contracted to perform the O&M services at the PEC Stapp Facility.

Responsibilities include:

- Follow the requirements and processes documented in the EOP.
- Conduct facility readiness reviews and provide reports to Commercial Asset Staff and Compliance Manager.

- Coordinate with and report facility weather-related information to Commercial Asset Staff and QE Solar Operating Personnel.
- Identify potential risk areas due to hurricane conditions and report opportunities to improve readiness and response to the Commercial Asset Staff.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-hurricane evaluations to assess the effectiveness of this annex and provide feedback.

QE Solar Operating Personnel

32.5 Role – The Generator Operator for the PEC Stapp facility.

32.5.1 Responsibilities include:

32.5.2

- Operates the PEC Stapp site from the QE Solar operations center in Springfield, NJ.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a PEC Stapp outage, shutdown, or curtailment
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to PEC Stapp upon completion and request.
- Participate in training and drills, as appropriate.

32.6

- Participate in post-incident reviews.

32.6.1

QE Solar Safety Manager Operating Personnel

32.6.2

Role – The Safety Manager for the PEC Stapp facility.

Responsibilities include:

- Must ensure that a Project-Specific Emergency Operations Plan (EOP) has been developed and that project management/supervision has been properly trained to implement the plan.
- Responsible for ensuring that appropriate employee health and OSHA records are maintained.
- Responsible for making this written plan available to employees.
- Participate in training and drills, as appropriate.

- Participate in post-incident reviews.

33.0 LOCAL CONDITIONS

Local Conditions

33.1 Junction, TX is used for comparison of the local Facility conditions. PEC Stapp is located in Junction, TX and is approximately 200 miles from the Gulf of Mexico and sits at approximately 1604 feet Above Sea Level (ASL). Three major hurricanes (Gilbert in 1988, Ike in 2008 and Hanna in 2020) have tracked within 75 miles of the PEC Stapp facility since 1967. Many other major storms have impacted the area in the last 50 years.

Figure 1: PEC Stapp site location

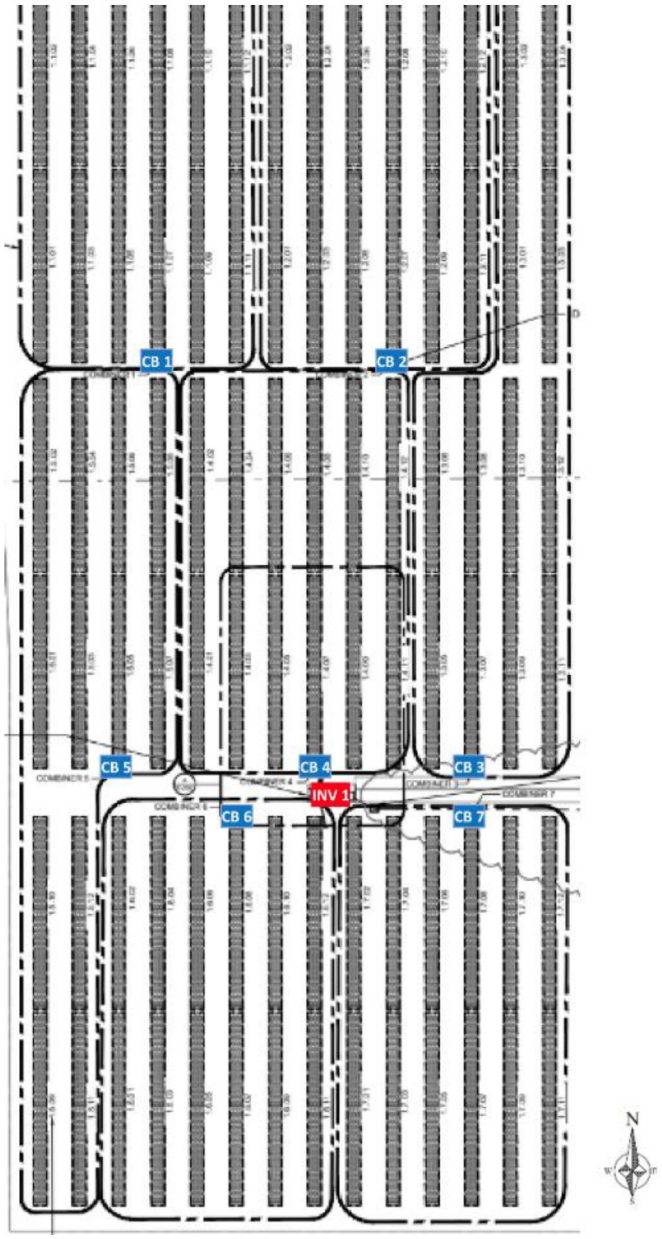


Figure 1: PEC Stapp I Site Plan

34.0 HURRICANE AND TROPICAL STORM PREPARATIONS AND REVIEW

Pre-Hurricane Season Checks

34.1 The Atlantic Hurricane Season runs from **June 1** to **November 30** of each calendar year, Field Services will utilize the *Hot Weather Annex* to complete all pre-season checks, which includes items related to hurricane preparedness.

Pre-Event Checklist

34.2 Field Services will complete the *Hurricane and Tropical Storm Pre-Event Checklist* upon issuance of any watch by the National Hurricane Center for Tropical Storm or Hurricanes which has the potential to impact the PEC Stapp facility.

As part of its preparation, Field Services personnel will utilize its **Critical Equipment Matrix** as found in the *Emergency Operations Plan* to evaluate areas of vulnerability from heavy rain, lightning, flooding and high wind conditions at the facility.

34.3 ### Post-Event Checklist

Follwing a hurricane or tropical storm, Field Services personnel will complete the *Hurricane and Tropical Storm Post-Event Checklist*.

35.0 EQUIPMENT DESIGN PARAMETERS AND WEATHER DESIGN LIMITS

The PEC Stapp facility has a design maximum ambient temperature (maximum operating temperature) of 122 degrees Fahrenheit (temperature >122 degrees Fahrenheit results in equipment derations) and a design minimum ambient temperature (minimum operating temperature) of -31 degrees Fahrenheit.

Field Services personnel will utilize, as part of the implementation of this annex, manufacturers recommendations to determine at what wind speed the facility and any critical equipment will be able to operate.

36.1

36.1.1

36.0 HURRICANE AND TROPICAL STORM COMMUNICATIONS

Communication Protocols

The Commercial Asset Staff will communicate all hurricane and tropical storm preparation and response activities to the Compliance Manager.

Before anticipated hurricane or tropical storm events, the Commercial Asset Staff will:

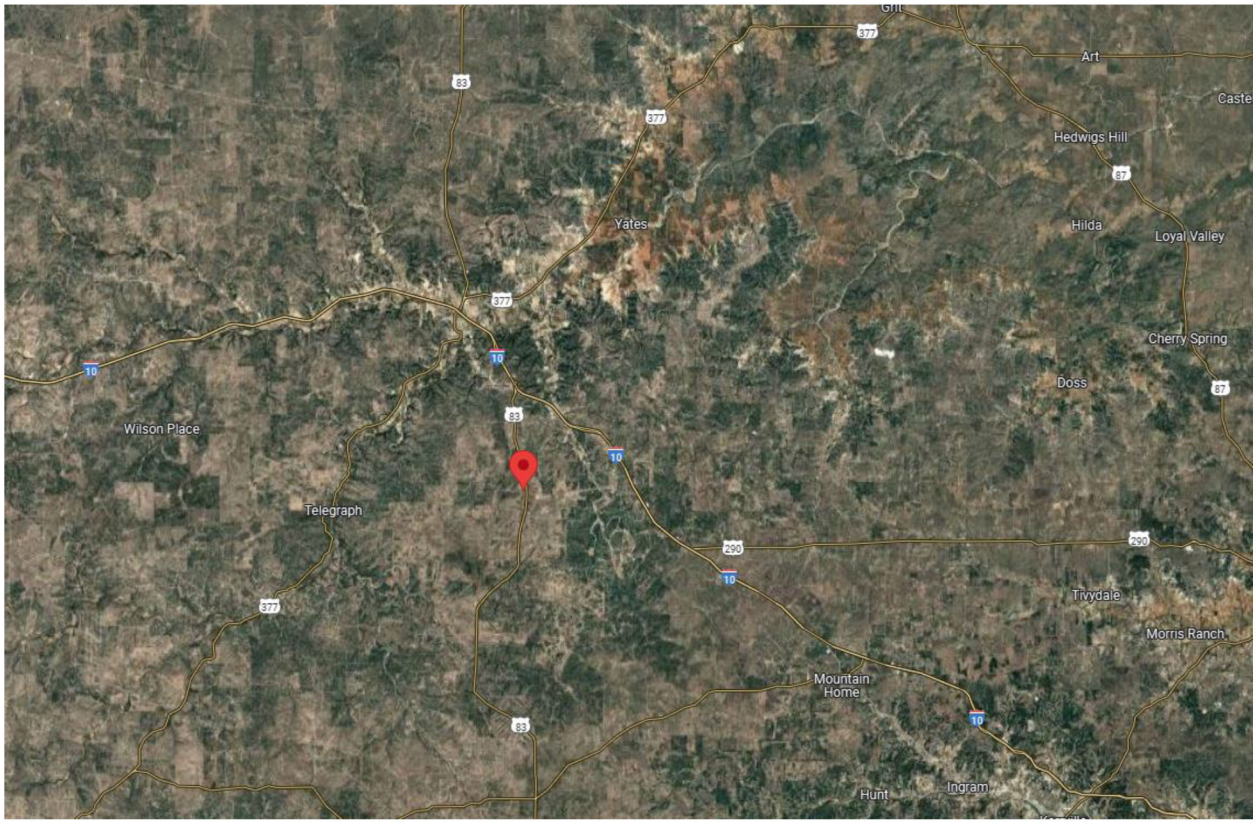
36.1.2 36.1.2.1 Communicate with Field Services and Operating Personnel that the site-specific hurricane preparation procedures, checklists, and reviews have been completed.

36.1.2.2 Communicate with all personnel about changing conditions and potential areas of concern to heighten awareness around safe and reliable operations.

36.1.3 Field Services personnel will notify Operating Personnel (who is required to notify the QSE and other entities) of instances of weather conditions leading to a facility outage, shutdown, or curtailment.

36.1.4 The Commercial Asset Staff will conduct job safety briefings prior to hurricane and tropical storm events which will include the availability of interpersonal communication capability and available back-up communications options. To that end, Field Services personnel will identify and verify the operations of all back-up communications options in case the primary system is not available.

37.0 EVACUATION ROUTES



37.1 *Figure 2: PEC Stapp Facility and Evacuation Routes*

Evacuation Notification

The TDEM determines the need for large-scale evacuations, such as would be required during a hurricane.[2] Evacuation orders will be disseminated by local media and law enforcement. Upon issuance of an evacuation order, personnel at the PEC Stapp facility should immediately notify Field Services management to begin evacuation planning and evaluate the identified evacuation routes as indicated above. A determination of the most expeditious evacuation route available should be made. Personnel should consult available smartphone traffic applications and local news sources in determining evacuation route suitability.

Notification to QE Solar Control Center of Evacuation Notification

Upon notification of an evacuation order or Field Services management decision to evacuate as a precaution, Field Services personnel notify Operating Personnel of the order/decision. Notification should include details around the nature of the threat, time of departure,
37.2 evacuation route to be utilized and alternative contact means (personal cell phones, etc.) as necessary.

Determination to Remain Energized Or Deenergize the Facility

Upon notification to the QE Solar Control Center of an evacuation order, Field Services
37.3 personnel will request that QE Solar verify if PEC Stapp should remain energized. This would include communications with the Owner. All subsequent actions should only be taken if Personnel safety is not at risk.

37.3.1 Upon determination that PEC Stapp should remain energized, Field Services personnel shall perform any remaining checks prior to leaving the facility.

37.3.2 Upon determination to de-energize the facility, Field Services personnel shall assist QE Solar in the de-energization and placement of the facility in a safe position, establishing clearances as required.

38.0 FACILITY RE-ENTRY POST STORM

38.1

Re-entry Procedure

Upon receipt of an all-clear announcement from local officials, designated Field Services personnel should proceed from their evacuation locations to the PEC Stapp facility.

Prior to re-entry to PEC Stapp, Field Services will contact QE Solar Operating Personnel for a facility status update. Information regarding status of the PEC Stapp facility, and any other site information the Operating Personnel through telemetry, standing alarms, video feeds or other means, will be shared.

It is preferable that re-entry be accomplished with at least two (2) Field Services personnel for safety reasons. If only one (1) Field Services personnel is available, extreme caution shall be exercised and constant communication with QE Solar Operating Personnel or other off-site Field Services personnel should be established.

The PEC Stapp facility consists of one perimeter. Prior to re-entry to Stapp, Field Services will do a visual inspection of the facility from the outer gate and perimeter fence, observing for post-

storm hazards such as downed trees, washed away berms, standing water and any other hazards that may impede entry into the facility.

Once established that it is safe to proceed from the main entry gate, a visual inspection of the PEC Stapp facilities should be made from outside the PEC Stapp main gate for storm damage that may make entry hazardous. When determined safe to proceed, the facility should be entered, and the Re-Entry checklist performed.

Extreme caution should be used when reentering the facility. If found in a state believed to be de-energized all equipment must be verified as de-energized prior to approaching the equipment. Voltage detection equipment must be used to verify equipment is de-energized.

The Commercial Asset Staff will consider the need for enhanced staffing at the facility (including on a 24x7 basis) during recovery from severe weather events. Planning for this staffing should include arrangements for transportation, lodging/meals, and in-house food inventories, as appropriate.

39.0 ANNUAL TRAINING AND REPORTING REQUIREMENT

The PUCT requires that all relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Annual training and review as part of the *Hot Weather Annex* training and review will be conducted on hurricane and tropical storm topics to support readiness for executing and implementing this annex. Review will use this document and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by storm conditions.
- A review of personnel health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Evacuation planning.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended severe weather outlook if available.

At the end of each calendar year, the Commercial Asset Staff will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

3. Titles and names of persons in the organization receiving access to and training on the EOP; and

4. Dates of access to or training on the EOP, as appropriate.

40.0 RESOURCES AND RELATED DOCUMENTS

PEC Stapp Emergency Operations Plan

PEC Stapp Hot Weather Annex

PEC Stapp Cold Weather Annex

ERCOT

Resource Entities webpage – Weather Readiness

https://www.ercot.com/gridinfo/generation

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

41.0 SECTION 25.53 AND 25.55 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
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.

Term	Definition
Energy storage resource	An energy storage system registered with ERCOT as an energy storage resource for the purpose of providing energy or ancillary services to the ERCOT grid and associated facilities controlled by the generation entity that are behind the systems point of interconnection, necessary for the operation of the system, and not part of a manufacturing process that is separate from the generation of electricity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Generation entity	An ERCOT-registered resource entity acting on behalf of an ERCOT-registered generation resource or energy storage resource.
Generation resource	A generator registered with ERCOT as a generation resource and capable of providing energy or ancillary services to the ERCOT grid, as well as associated facilities controlled by the generation entity that are behind the generator's point of interconnection, necessary for the operation of the generator, and not part of a manufacturing process that is separate from the generation of electricity.
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.
Inspection	Activities that ERCOT employees, commission staff, and designated contractors engage in to determine whether a generation entity is in compliance with all or parts of subsection (c) of this section or whether a TSP is in compliance with all or parts of subsection (f) of this section. An inspection may include site visits, assessments of procedures, interviews, and review of information provided by a generation entity or TSP in response to a request by ERCOT, including review of evaluations conducted by the generation entity or TSP or its contractor.
Major weather-related forced interruption of service of a resource	The failure of a resource to start, following one or more attempts, for 12 or more continuous hours as a result of a weather emergency; or The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable rating for 12 or more continuous hours as a result of a weather emergency.
Repeated weather-related forced interruption of a service	Three or more of any combination of the following occurrences as a result of separate weather emergencies within any three-year period: (J) The failure of a resource to start; (K) The loss of 50% or more of the capacity reflected in a resource's seasonal net maximum sustainable

Term	Definition
	(L) rating for 30 minutes or more; or The loss or derate of 50% or more of a transmission facility's rating.
Resource	A generation resource or energy storage resource.
Summer season	June 1 to September 30 each year.
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.
Weather critical component	Any component of a resource or transmission facility that is susceptible to fail as a result of a weather emergency, the occurrence of which failure is likely to significantly hinder the ability of the resource or transmission facility to function as intended or, for a resource, is likely to lead to a trip, derate of more than five percent of the capacity represented in the resource's seasonal net maximum sustainable rating or of the transmission facility's rating, or failure to start.
Weather emergency	A situation resulting from a summer or winter weather event that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT issues an Emergency Notice to market participants involving an operating condition in which the safety or reliability of the ERCOT system is compromised or threatened by summer or winter weather.
Weather emergency preparation measures	Measures that a generation entity or TSP takes to support the function of a resource or transmission facility during a weather emergency.
Winter season	December 1 to February 28 of the following year.

DISTRIBUTION LIST

Entity	Title	Name
QE Solar	QE Solar Commercial Assets Manager	Claire Sweet

Entity	Title	Name
QE Solar	Field Services Lead	Anthony Tesi
QE Solar	Operations Control Center Manage	Matt Bernard
QE Solar	Safety Manager of Technical Services	Alex Lasher
QE Solar	Field Technician	Larry Moore
GSPP	Director of AM	Aswanth Rajeev
GSPP	Director of O&M	Mike Butler

APPROVALS

The approval signatures in this section indicate review of the document and approval to publish.

Name	Date	Signature
Aswanth Rajeev	2/28/2025	AR

REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes With each new effective date and version entry, the previous EOP version is superseded.
1.0		PEC Stapp, QE Solar O&M and Operator	New plan at PGC registration. This version supersedes previous EOP versions.

ATTACHMENT 1: HURRICANE AND TROPICAL STORM PRE-EVENT CHECKLIST

Date performed	
Completed by (name)	

	Pre-Event Checks **Instructions**: Check each item when complete and provide completed checklist to Commercial Asset Staff and Compliance Manger. Use blank lines to add items as needed.
☐	Monitor weather and weather alerts. Note in facility logs when Hurricane or Tropical Storm watch has been issued, and subsequently recalled or released.
☐	Notify Operating Personnel of storm notification and relevant information.
☐	Review evacuation routes regardless of evacuation probability.
☐	Place severe weather protections in service where weather could adversely impact personnel, operations, or forced outage recovery (including severe thunderstorms, damaging winds or flooding).
☐	Verify all facility drainage infrastructure is intact and free of obstructions.
☐	Verify all access gates closed and with intact working locks.
☐	Check all facility building and cabinet doors (transformer, circuit breakers, mega-packs, etc.) shut and locked if applicable.
☐	Check site for loose or unsecured equipment including spare parts, tools, rubbish bins, temporarily stored items.
☐	Verify all phone, radio and other communication systems operational with batteries fully charged.
☐	
☐	
☐	
☐	

ATTACHMENT 2: HURRICANE AND TROPICAL STORM POST-EVENT CHECKLIST

Date performed	
Completed by (name)	

Hurricane and Tropical Storm Post-Event Review Checklist **Instructions**: Check each item when complete and provide completed checklist to Commercial Asset Staff and Compliance Manger. Use blank lines to add items as needed.	
☐	Communicate with GOP Operating Personnel on status of facility (energized/de-energized, alarms, etc.) and status of Interconnection Substation (energized/deenergized, hot line from PEC Stapp to POI, etc.)
☐	Verify outer perimeter safe to enter through visual inspection.
☐	Note any hazardous situations that need immediate remediation within the outer perimeter, place warning signs/tape as necessary to alert others to hazard.
☐	Note any missing/damaged security fencing for the outer perimeter, secure if possible.
☐	Verify PEC Stapp Facility safe to enter through visual inspection.
☐	Verify the Energize/De-energize status of all PEC Stapp Facility equipment. Establish electrical clearances as appropriate for the situation.
☐	Note any hazardous situations that need immediate remediation within the inner perimeter, place warning signs/tape as necessary to alert others to hazard.
☐	Visually verify the integrity of all equipment. Note any items needing immediate attention (cabinet damage, damaged closures, etc.)
☐	Visually verify the integrity of all medium and high voltage substation equipment.
☐	Document all discrepancies noted and create work orders as necessary to address damage to the facility.
☐	Identify any lessons learned or procedural improvements to include in this annex, including any updates to this readiness timeline or extreme heat or severe hot weather preparedness checklist.

PEC Stapp

Hot Weather Annex

QE Solar, LLC

GSPP

Company Name: GSPP	**Job Name:** PEC Stapp
Job Address: 361 Phil Stapp Road, Junction, TX, 76849	
Nearest Intersection: N/A	
Latitude: 30.3560352	**Longitude**: -99.70975

42.0 APPROVAL AND IMPLEMENTATION SECTION

E. Introduction and Applicability

Introduction

This annex provides guidance and direction to PEC Stapp specific to hot weather operations, planning, and emergency response. PEC Stapp does not have any fuel switching equipment nor does it use water in the generation of electricity.

42.1

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the PEC Stapp Asset Manager.

F. Roles and Responsibilities

PEC Stapp Asset Manager

42.2

42.2.1 Role – The PEC Stapp Asset Manager and owner of the EOP.

42.2.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with PEC Bank's I business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Commercial Assets Staff.
- Reviews and approves the EOP annually.
- Maintains evidence.

QE Solar Commercial Assets Staff

Role – responsible for the team contracted to perform the O&M services at the PEC Stapp Facility.

42.3

Responsibilities include:

42.3.1

- Ensure the processes documented in the EOP are followed by all site personnel.

42.3.2

- Lead Field Services in the execution of the EOP and set expectations for the safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Asset Manager that pre-hot weather checks and summer season review activities have been completed.
- Oversee the day-to-day operations of the PEC Stapp facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for seasonal operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hot weather preparation needs or deficiencies.
- Notify the Asset Manager of weatherization tasks progress, scheduling, or concerns with meeting deadlines
- Participate in the development and update of the EOP, under the leadership of the Asset Manager.
- Ensure annual drill requirements are met and submit evidence to PEC Stapp upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Asset Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to PEC Stapp upon completion and by the end of each calendar year.

42.4

42.4.1

- Provide evidence to PEC Stapp Asset Manager upon completion and request.

42.4.2

QE Solar Field Service Technicians

Role – Contracted to perform the O&M services at the PEC Stapp Facility.

Responsibilities include:

- Follow the requirements and processes documented in the EOP.

- Conduct facility readiness reviews and provide reports to Commercial Assets Staff and Asset Manager.
- Participate in responses to incidents and provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in training and drills.
- Participate in post-incident reviews.
- Participate in post-winter evaluations to assess the effectiveness of this annex and provide feedback.

QE Solar Operating Personnel

42.5 Role – The registered Generator Operator (GOP) for the PEC Stapp facility.

42.5.1 Responsibilities include:

42.5.2

- Operates the PEC Stapp site from the QE Solar operations center in Springfield, NJ.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Provide notifications to ERCOT, QSE, Reliability Coordinator, etc. as required.
- Submit evidence to PEC Stapp upon completion and request.
- Participate in training and drills, as appropriate.

42.6
- Participate in post-incident reviews.

42.6.1 **QE Solar Safety Manager Operating Personnel**

42.6.2 Role – The Safety Manager for the PEC Stapp facility.

Responsibilities include:

- Must ensure that a Project-Specific Emergency Operations Plan (EOP) has been developed and that project management/supervision has been properly trained to implement the plan.
- Responsible for ensuring that appropriate employee health and OSHA records are maintained.
- Responsible for making this written plan available to employees.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews.

43.0 LOCAL CONDITIONS

For comparison, the recorded temperatures for summer 2024 (June through September) range from an average maximum temperature of 98°F (August)[3], to an average minimum temperature of 75°F (June)[4], with a high of 104°F recorded in June.

44.0 REQUIRED TIMELINES FOR HOT WEATHER/SUMMER PREPARATIONS

Pre-Summer Season Checks

44.1 Prior to **April 1** of each calendar year, Field Services will complete a *Pre-Summer Checklist*.

Pre-Event and Extreme Hot Weather Checks

44.2 Field Services will utilize and complete the *Pre-Event Checklist* upon recognition or notification of a possible weather-related event (e.g. extreme hot weather or otherwise). The *Extreme Hot Weather Checklist* will be utilized prior to the forecasted temperature reaching 108°F and/or the possibility of an extreme cold weather event. The process for activating the EOP and annexes is documented in the *Emergency Operations Plan*.

45.0 PEC Stapp CRITICAL COMPONENTS AND EQUIPMENT

As part of its hot weather readiness and preparation, Field Services personnel will identify and prioritize critical components, equipment, and other areas of vulnerability which may experience severe hot weather operational issues (i.e., critical equipment or components that has the potential to cause a trip, de-rate, or failure to start due to extreme hot weather event).

The **Critical Equipment Matrix** attachment identifies the critical components and equipment at the facility that perform or support significant reliability or operating functions, including any existing type(s) of weather protection and any manufacturer-provided weather design limits.

Field Services personnel will ensure all critical site-specific equipment and components have adequate protection to ensure operability during extreme heat or severe hot weather events, including but not limited to performing maintenance prior to the beginning of summer and increasing surveillance during extreme hot weather events.

[3] https://weatherspark.com/s/145843/1/Average-Summer-Weather-at-McAllen-Miller-International-Airport-Texas-United-States#Figures-CloudCover
[4] https://weatherspark.com/s/145843/1/Average-Summer-Weather-at-McAllen-Miller-International-Airport-Texas-United-States#Figures-CloudCover

Equipment Design Parameters and Weather Design Limits

45.1 The PEC Stapp facility has a design maximum ambient temperature (maximum operating temperature) of 122 degrees Fahrenheit (temperature >122 degrees Fahrenheit results in equipment derations) and a design minimum ambient temperature (minimum operating temperature) of -31 degrees Fahrenheit.

Field Services personnel will utilize, as part of the implementation of this annex, manufacturers recommendations to determine at what ambient temperature the facility and any critical equipment will be able to operate.

46.0 HOT WEATHER PREPARATION AND RESPONSE PROCESSES

To support the facility's seasonal hot weather preparedness, address known critical failure points, and address the effects of equipment and facility weather design limitations, several checklists are provided to prepare and safeguard the facility. Field Services personnel will utilize these checklists to prepare for summer and respond to hot weather events.

46.1 Hot Weather Equipment Inventory List

Prior to the onset of the summer season and/or a severe hot weather event, Field Services personnel will ensure there are adequate inventories of all critical supplies, spare parts, equipment, and consumables that would aid in keeping the facility operational during severe hot weather events and responding to these events. Field Services personnel will use and complete the *Hot Weather Equipment Inventory* and provide the dated checklist as evidence 46.2 that the inventory review was performed.

Pre-Summer Checklist

46.3 The *Pre-Summer Checklist* includes verifications of Field Services personnel readiness and review of this annex. These checklists are due within specified timeframes as they connect directly to required reporting to ERCOT and the PUCT.

Pre-Event and Extreme Hot Weather Checklists

The *Pre-Event Checklist* and the *Extreme Hot Weather Checklist* will be completed by Field Services personnel to verify communications and preparations are completed and that the facility's critical equipment is protected and functioning properly in advance of each forecasted weather event.

Post-Event and Annual Review

After each severe hot weather event and before the kickoff of the summer season preparations, Field Services personnel will utilize a review process to formally recognize procedural strengths, evaluate improvement opportunities, corrective actions needed, updates
46.4 needed to address past weather emergencies, assessment of necessary supplies, and lessons learned, which will be incorporated into the EOP going forward.

Any work orders arising from this review process will also be implemented. All changes to these procedures and the EOP must be communicated to all appropriate personnel and regulators. In addition, the Commercial Assets Staff will identify and communicate to the Asset Manager any weatherization improvements that should be included for the subsequent year's budget.

Documenting Summer Season Preparedness Activities via Work Order Management

46.5 Field Services personnel will review its work management system to ensure adequate annual preventative work orders exist for summer season preparedness. Field Services personnel will also ensure: (i) all open corrective maintenance items that could affect facility operation and reliability in hot weather; and (ii) all hot weather preparedness preventative work orders are completed prior to the onset of the summer season.

46.6

Additional Staffing Consideration for Weather Events

The Commercial Assets Staff will consider the need for enhanced staffing at the facility (including on a 24x7 basis) during anticipated severe weather events. Planning for this staffing should include arrangements for transportation, lodging/meals, and in-house food inventories, as appropriate.

47.0 BUSINESS CONTINUITY - CRITICAL FAILURE POINTS – PERSONNEL (STAFFING)

QE Solar and PEC Stapp have identified the following potential personnel critical failure points and has planned remediation for each role, as noted. There will be no additional staffing prior or during a severe weather events/conditions, but QE Solar is able to mobilize additional Field Services technicians, managers and/or contractors to supplement site team, as needed.

Role	Notes	Remediation
Field Technicians	*Typically, three (3) regional field service technicians are available to support.*	*If all field technicians are unavailable, additional personnel may be dispatched, as approved by the*

Role	Notes	Remediation
		Commercial Assets Staff, for relocation to supplement facility staffing.
Field Management	A regional field manager and director are available.	If the manager or director is unavailable, the other can support field operations leadership and decision-making.

48.0 HEAT-RELATED SAFETY INFORMATION

Personnel Safety

48.1 Personnel safety during extreme hot weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Personnel will stay informed of potential severe weather events and utilize the information in this annex to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme hot weather events.

48.2

Heat Exhaustion

48.2.1

Signs of heat exhaustion include:

- Heavy sweating
- Weakness
- Cold, pale, clammy skin
- Fast, weak pulse
- Nausea or vomiting
- Fainting

48.2.2

Response to a heat exhaustion illness should include the following actions:

- Move to a cooler location.
- Lie down and loosen clothing.
- Apply cool, wet clothes to as much of your body as possible.
- Sip water.

Seek immediate medical attention by calling 911 if you experience vomiting or if your symptoms get worse or last longer than an hour.

Heat Stroke

Heat stroke is a condition in which your body is unable to adequately cool any longer.

48.3 Signs of heat stroke include:

48.3.1
- High body temperature (103oF or higher)
- Hot, red, dry, or damp skin
- Headache
- Dizziness
- Nausea
- Confusion
- Loss of Consciousness

48.3.2 Response to heat stroke should include the following actions:

- Contact Emergency Services by calling 911 if you suspect heat stroke.
- Move person to a cooler place.
- Help lower the person's temperature with cool cloths or a cool bath.
- DO NOT give the person anything to drink.

48.4

48.4.1 **Safety Procedures**

During extreme hot weather events, facility Personnel should adhere to the following procedures.

48.4.1.1 Review heat stress training and related illness signs and symptoms with all personnel on at least a monthly basis during the summer months and prior to anticipated extreme hot weather events.

48.4.1.2 Take breaks in air-conditioned spaces

48.4.1.3 Wear loose, lightweight, light-colored clothing.

48.4.1.4 Wear hats when working outdoors.

48.4.1.5 Wear and reapply sunscreen as indicated on the package.

48.4.1.6 Regularly drink water to remain hydrated (two to four 8-ounce cups of water every hour while working).

48.4.1.7 Where possible, schedule outdoor work for earlier or later in the day to avoid the hottest part of the day.

48.4.1.8 Seek medical care immediately if you or a co-worker shows symptoms of heat-related illness.

49.0 HOT WEATHER EVENT COMMUNICATIONS

Communication Protocols

49.1 The Commercial Assets Staff will communicate all hot weather preparation and response activities to the Asset Manager.

49.1.1

49.1.2 Before anticipated extreme hot weather event, the Commercial Assets Staff will:

49.1.2.1 Communicate with Field Services, QE Solar Operating Personnel, and the PEC Stapp Asset Manager that the site-specific hot weather readiness activities and preparation procedures, checklists, and reviews have been completed.

49.1.2.2 Communicate with all personnel about changing conditions and potential areas of concern to heighten awareness around safe and reliable operations.

49.1.3

49.1.4 Field Services personnel will notify QE Solar Operating Personnel (who is required to notify the QSE and other entities) of instances of weather conditions leading to a facility outage, shutdown, or curtailment.

Conducting job safety briefings during extreme hot weather events will include the availability of interpersonal communication capability and available back-up communications options. To that end, Field Services personnel will identify and verify the operations of all back-up communications options in case the primary system is not available.

50.0 ANNUAL TRAINING AND ANNEX REVIEW

It is imperative that all relevant operating personnel are familiar with and committed to following this annex, except to the extent that deviations are appropriate under the circumstances during an extreme hot weather event.

To that end, annual review and training will be conducted on hot weather and facility-specific awareness topics to support readiness for executing and implementing this annex. Training must use this annex and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by hot conditions.
- A review of hot weather health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended weather outlook.

All records of attendance for the annual training, drills, or exercises involving this annex will be retained in the PEC Stapp evidence repository.

51.0 RESOURCES AND RELATED DOCUMENTS

PEC Stapp Emergency Operations Plan

PEC Stapp Hurricane Annex

ERCOT

Resource Entities webpage – Weather Readiness

https://www.ercot.com/gridinfo/generation

- **Summer Weather Readiness – Generation Entity Declaration Template**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

52.0 SECTION 25.53 AND 25.55 DEFINITIONS