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Received - 2022-04-18 12:46:24 PM Control Number - 53385 ItemNumber - 295



April 18, 2022

Public Utility Commission of Texas 1701 N Congress Avenue PO Box 13326 Austin, TX 78711-3326

The Electric Reliability Council of Texas (ERCOT) 8000 Metropolis Drive Building E, Suite 100 Austin, TX 78744

RE: 16 TAC § 25.53, ELECTRIC SERVICE EMERGENCY OPERATING PLAN

EXECUTIVE SUMMARY

ProEnergy Holding Company Inc. and its subsidiaries (collectively referred to as "PROENERGY"), established the Electric Service Emergency Operations Plan (EOP/Plan) to address power plant operations and response during Emergency Events.

Per the Texas Administrative Code §25.53, PROENERGY updated its Plan to ensure compliance with the applicable requirements. The PROENERGY Plan contains procedures for addressing weather related and non-weather-related emergencies. Specific sections of the EOP that correspond to requirements of 16 Texas Administrative Code §25.53 are as follows:

PUCT 25.53			PROENERGY EOP		Description	
(d)	(1)	(A)	Page 2	Section 2	EOP introduction and applicability	
(d)	(1)	(B)	Page 3	Section 3	EOP roles and responsibilities	
(d)	(1)	(C)	Page 2	Section 2	Revision control	
(d)	(1)	(D) (E)	Page 2	Section 2	Dated statements	
(d)	(2)	(B)		Section H	Communications Plan	
(d)	(3)		Page 6	Section F	Pre-identified supplies for emergency response	
(d)	(4)		Page 5	Section C	Staffing during an emergency response	
(d)	(5)		Page 5	Section B	Identification of emergencies and activation of EOP	
(d)	(6)		Page 7	Section 8	Relevant Annexes	
(f)			Page 6	Section 6	Drills	

PROENERGY

Contacts for questions and requests regarding the PROENERGY Plan are as follows:

Contact Priority	Name	Title	Phone	Email
Primary	Kevin Chaffin	Plant Manager	806-215-5581	kchaffin@proenergyservices.com
Backup	Jennifer Deese	Director, Regulatory Compliance	315-796-7207	jdeese@proenergyservices.com

Record of Distribution of the PROENERGY EOP is as follows:

Name	Title	Date of Access/Training
Izzat Figueroa	O&M Supervisor	April 13, 2022
Johnny Perez	O&M Supervisor	April 13, 2022
Ryan Bracamonte	O&M Supervisor	April 13, 2022
Josue Gonzalez	I&C Technician	April 13, 2022
Delfino Mazariegos	O&M Technician	April 13, 2022
Michael Butler	O&M Technician	April 13, 2022
Brian Spurlock	O&M Technician	April 13, 2022
Douglas Hoffman	O&M Technician	April 13, 2022
Chad Hall	ROC Manager	April 13, 2022
Zach Acreman	Control Room Operator	April 13, 2022
Brian Bousquet	Control Room Operator	April 13, 2022
Humberto Figueroa	Control Room Operator	April 13, 2022
Damon Sabella	Control Room Operator	April 13, 2022
Tray Bussey	Control Room Operator	April 13, 2022
John Smith	Control Room Operator	April 13, 2022
Henry Carter	Control Room Operator	April 13, 2022
Tina Lee	VP Asset Management	April 13, 2022
John Stevens	SVP Aero Advantage	April 13, 2022
Mike Alvarado	President	April 13, 2022
Cliff Oliver	VP Asset Management	April 13, 2022
Chris Evans	VP Marketing	April 13, 2022



ELECTRIC SERVICE EMERGENCY OPERATIONS PLAN SWORN ATTESTATION

Applicable Entities:

- HO Clarke Generating, LLC
- HO Clarke II, LLC
- Topaz Generating, LLC
- Topaz II, LLC

Generation Resources:

- HO Clarke (PRO) Unit 1 through Unit 6
- HO Clarke II (PRO) Unit 7 and Unit 8
- Topaz (TPZ) Unit 1 through Unit 7
- Topaz (TPZ) Unit 8 through Unit 10

I attest that I am the highest-ranking representative, official, or officer with binding authority over the Entities identified above.

I attest that all activities described in 16 Texas Administrative Code §25.53(c)(4)(C) have been completed for the above-identified Generation Resources. Further, I attest that the statements contained in the Electric Service Emergency Operations Plan submitted for the above-identified Generation Resource are true and accurate.

Signature

/Signatory Name Michael Alvarado **Title** President

State of: TEXAS

County of: HARRIS

MICHAEL ALVARADO SUBSCRIBED AND SWORN TO BEFORE ME ON THIS TO DAY OF A P R I L



Notary Public Signature