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§25.53 EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

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

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

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

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

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

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 5 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes the purpose of the plan and a statement regarding the applicability of the EOP. This first section addresses the EOP training policy for Bluebonnet and prescribes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 11 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan section. This section of the plan includes the strategies, key policies, roles, and communications steps that Bluebonnet undertakes in an emergency event. Key policies include tracking and coordination of external communications, the designation of spokesperson(s) for the Cooperative, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses all the requirements in 16 TAC §25.53 regarding

communications with the public, the media, Bluebonnet members, the PUC, OPUC, local and State Governmental Entities, Officials, and (County) Emergency Operations Centers, ERCOT, and Critical Load members. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

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

This section begins on page 16 of the EOP and corresponds to §25.53(d)(3).

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

(Section-4) Staffing During Emergency Response Plan:

This section begins on page 17 of the EOP and corresponds to §25.53(d)(4).

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

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

This section begins on page 44 of the EOP and corresponds to §25.53(d)(5).

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

EOP Annexes

Weather Emergency Annex:

This section begins on page 49 of the EOP and corresponds to §25.53(e)(1)(A).

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

Load Shed Annex:

This section begins on page 52 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding Bluebonnet preparations and actions for ERCOT Emergency Event Alerts (EEA) levels and include details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between Lower Colorado River Authority Transmission Services Corporation (LCRA TSC) and Bluebonnet regarding the planning and preparation for load shed events and contains detailed information regarding other operational information for EEA events. This Annex also contains information on the Bluebonnet procedure for restoration following a load shed event, and key policies and procedures that Bluebonnet utilizes for restoration from significant system outage events. The final subsection of this Annex provides information on Bluebonnet's Critical Load Registry and information related to the maintenance of the registry, communication procedures to these members, and other relevant

information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 57 of the EOP and corresponds to §25.53(e)(1)(C).

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

Wildfire Annex:

This section begins on page 64 of the EOP and corresponds to §25.53(e)(1)(D).

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

Hurricane Annex:

This section begins on page 68 of the EOP and corresponds to §25.53(e)(1)(E).

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

Cyber Security Annex:

This section begins on page 69 of the EOP and corresponds to §25.53(e)(1)(F).

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

Physical Security Incident Annex:

This section begins on page 73 of the EOP and corresponds to §25.53(e)(1)(G).

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

Plan Distribution and Training

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

Bluebonnet Personnel			EOP Distribution Date	EOP Training Completed Date
First Name	Last Name	Title		
BRANDI	LOWE	MANAGER OF ENERGY SERVICES	Posted on Bluebonnet intranet on 4/18/22. All Bluebonnet employees have access to the updated EOP and will be informed by supervisors of the electronic location of the plan.	Bluebonnet trains personnel regularly on the Bluebonnet EOP. All Bluebonnet personnel on list have received a copy of the EOP and have completed a self-training on or before the submittal date of 4/18/22.
DANIEL	FOWLER	TECHNOLOGY PROGRAMS MANAGER		
DAVID	TOBOLA	MANAGER OF OPERATIONS		
EDWARD	BITZKIE	FACILITIES CONSTRUCTION COORDINATOR		
ERIC	KOCIAN	CHIEF ENGINEER/SYSTEM OPERATIONS OFFICER		
EUGENE	URBAN	MANAGER OF FACILITIES		
GRANT	GUTIERREZ	CHIEF FINANCIAL OFFICER		
GREGORY	ROEBER	MANAGER OF CONTROL CENTER		
HEATH	SIEGMUND	MANAGER OF SAFETY SERVICE AND COMPLIANCE		
HEIDI	EXNER	CONTROLLER		
JENNIFER	FOERY	MANAGER OF HUMAN RESOURCES		
JENNIFER	MARTIN	MANAGER OF MEMBER OPERATIONS		
JOEY	TOBOLA	MANAGER OF CONTRACTORS		
KATHY	HOLMES	MANAGER OF CALL CENTER		
MATT	BENTKE	CHIEF EXECUTIVE OFFICER		
PHILLIP	ELLIS	MANAGER OF TECH SERVICES		
RACHEL	ELLIS	CHIEF ADMINISTRATIVE OFFICER		
SARAH	NEWMAN-ALTAMIRANO	GENERAL COUNSEL		
THOMAS	ELLIS	MANAGER OF ENGINEERING (PE)		
WESLEY	BRINKMEYER	MANAGER OF COMMUNITY & DEVELOPMENT SERV		
WILLIAM	HOLFORD	MANAGER OF PUBLIC AFFAIRS		

PROJECT NO. 53385

**AFFIDAVIT OF GENERAL MANAGER / CHIEF EXECUTIVE OFFICER OF
BLUEBONNET ELECTRIC COOPERATIVE, INC.**

PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF BASTROP §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath he or she is entitled to make this Affidavit, and that the statements contained below are true and correct.

I, Matt Bentke, swear or affirm that as an Electric Cooperative operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region and control system, confirms the following:

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

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

The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, has been distributed to Bluebonnet Managers and Operations personnel;

Bluebonnet executives and Operations personnel have received training on the updated EOP;

In accordance with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for Bluebonnet Operations personnel will be completed in the 2022 calendar year.

Bluebonnet will notify Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

Bluebonnet has distributed the EOP or an appropriate summary to local Jurisdictions in the Bluebonnet service area as needed

Bluebonnet has a Business Continuity Plan related to returning to normal operations after an emergency event or situation;

Bluebonnet's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Matt BC

{Signature of Officer of the Cooperative}

General Manager

Bluebonnet Electric Cooperative, Inc.

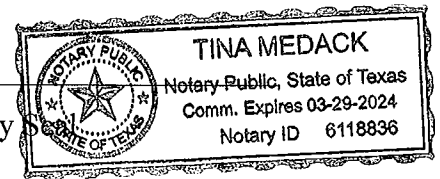
Sworn and subscribed before me on this 18th day of April, 2022.

Tina Medack

Notary Public in and for the State of Texas

(Must be notarized by a notary public in and for the State of Texas

Notary



PUC Primary and Backup Emergency Contact List

Primary Emergency Contact	Eric Kocian
Title	Chief Operations Officer
Email	Eric.kocian@bluebonnet.coop
Main Phone	(888) 622-2583
Cell Phone	(979) 251-1389

Secondary Backup Emergency Contact	Greg Roeber
Title	Control Center Manager
Email	Greg.roeber@bluebonnet.coop
Work Phone	(512) 332-7992
Cell Phone	(979)542-6857