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Project No. 53385

Entergy Texas, Inc.
EMERGENCY OPERATIONS PLAN

April 18, 2022

APPROVAL AND IMPLEMENTATION
25.53(d)(1)(B)–(d)(1)(E)

Document Title:	Entergy Texas, Inc.'s Emergency Operations Plan
Document Owner:*	Melanie Taylor
Owner Title:	Vice President Distribution Operations; Entergy Texas, Inc.'s Incident Commander
Revision Date:	4/18/2022 (initial filing pursuant to new 16 Tex. Admin. Code § 25.53)
Applicability:	The Emergency Operations Plan contained herein supersedes all of Entergy Texas, Inc.'s previous Emergency Operations Plans as of April 18, 2022.
Document Reviewer:*	Kelvin Winslow
Reviewer Title:	Sr. Manager, Operations & Safety, Entergy Texas, Inc.'s Incident Commander – Deputy
Reviewed Date:	4/18/2022

* Note: The Document Owner and Document Reviewer are responsible for maintaining and implementing Entergy Texas, Inc.'s Emergency Operations Plan. Entergy Texas, Inc.'s Manager of Regulatory Affairs is responsible for changing the Emergency Operations Plan.

Table of Contents: 16 Tex. Admin. Code 25.53(c)(1)(A)(i)(II)

I. Executive Summary: 25.53(c)(1)(A)

A. Description of Contents and Policies: 25.53(c)(1)(A)(i)(I); (d)(1)(A)

Entergy Texas, Inc. ("Entergy Texas," "ETI", or "Company") is a wholly owned subsidiary of Entergy Corporation ("Entergy"), which is a "holding company" pursuant to the Public Utility Holding Company Act of 2005. Entergy owns or operates, wholly or partially, an interconnected transmission, distribution, and generation system, which includes facilities physically located in Texas.

ETI utilizes existing emergency operations plans developed and administered by various organizations within Entergy, which are designed to protect the reliability of the electrical system and to facilitate the restoration of electric service to customers in a rapid, orderly, and safe manner. Entergy has extensive experience responding to emergencies (including multiple hurricanes), and the contents of Entergy's pre-existing documents and practices for emergency response have been effectively executed over the years. Three separate and distinct areas of emergency response are covered in these plans: (1) emergency response due to weather events, civil disturbances, cyber and physical security or other circumstances that could cause substantial damage to Company distribution, transmission, generation facilities or its information technology infrastructure; (2) emergency response due to demand and/or power supply situations that could result in overloaded facilities, and/or unacceptable voltage or frequency parameters; and (3) emergency response due to a pandemic or epidemic.

Entergy's emergency operations plans are intended to provide for prompt accumulation of information to determine the appropriate response, work forces required, priority of repairs, and progress of service restoration and to provide this information in a timely and accurate manner to Company management, emergency response managers, elected officials, regulatory agencies, the media, customers, and the general public as appropriate.

This document is ETI's Emergency Operations Plan ("EOP") which is a compilation of multiple plans, policies, and procedures for emergencies that are developed and maintained by various Company organizations. As a whole, these plans, policies, and procedures are the EOP, and an activation of one is an activation of the EOP. Each plan, policy, and procedure is reviewed and tested (either by a planned drill or actual implementation due to an event) on at least an annual basis. Upon completion of a test, a critique is conducted, and appropriate changes are made to the specific plan(s).

B. Reference to Specific Sections and Page Numbers: 25.53(c)(1)(A)(i)(II)

The Table of Contents contained herein provides the page numbers for the sections of this EOP and cross-references to the specific sections of 16 Tex. Admin. Code § 25.53 – Electric Service Emergency Operations Plans.

C. Record of Distribution: 25.53(c)(1)(A)(i)(III)

See section II.D. of ETI's EOP.

D. Affidavit: 25.53(c)(1)(A)(i)(IV)

See section II.C. of ETI's EOP.

II. Record of Distribution, Emergency Contacts and Affidavit: 25.53(c)(4)

A. Record of Distribution: 25.53(c)(4)(A)

After ETI submits its EOP to the Commission, ETI will distribute the EOP to ETI's Incident Response Leadership Team, namely the State Incident Commander, State Incident Commander - Deputy, State Incident Officers, and State Incident Section Chiefs. These Incident Leaders will then distribute ETI's EOP to their Incident Response Teams. Upon dissemination of the EOP, personnel will also be required to review and maintain training as appropriate on the relative plans, procedures, policies, and checklists for their respective incident response assignments.

ETI designates its record of distribution as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

B. Emergency Contacts (Primary and Backup): 25.53(c)(4)(B)

ETI designates this information as confidential and has filed it separately in Project No. 53385 on the Commission's Interchange.

C. ETI's Affidavit: 25.53(c)(4)(C)

Please see the attached affidavit of Eliecer Viamontes, ETI's President and Chief Executive Officer.

III. ETI EOP: 25.53(d)

A. Approval and Implementation: 25.53(d)(1)(A-E)

Please refer to the Approval and Implementation section contained on page 2 and Section I.A. of the EOP.

B. Communication Plan: 25.53(d)(2)(A) and (B)

In advance of any anticipated emergency, including severe storms, ETI's communications stress public safety and company preparedness. After the emergency passes, communications focus on safety and restoration to the extent applicable.

During any major electrical service outage, ETI recognizes the importance of providing timely and accurate information to the public. ETI continually monitors threatening weather that could possibly affect its customers, using the latest tools and services to track these weather systems 24-hours a day, 365-days a year.

ETI provides the public with prompt and accurate information through direct customer messaging

and established news and information channels. The most efficient method to quickly communicate with a large number of customers during emergency conditions is through traditional news media and ETI's social media channels including Facebook and Twitter. During system emergencies, ETI's communications employees are kept informed of system conditions and release media messages when appropriate. For a storm emergency known in advance (*e.g.*, a predicted hurricane), ETI begins storm readiness preparations upon notice of that storm that include external communications.

In addition to media contact during emergency events, ETI utilizes other communication methods to provide information to customers. For example, the Entergy Texas website has a storm outage page, called Entergy Storm Center,[1] that includes preparation and restoration information. ETI's View Outages Maps[2] show where outages are occurring, the number of customers affected, and provide estimated restoration times.

Customers can report outages through myEntergy, the Entergy mobile app, via text message or by calling Entergy's Customer Contact Center at 1-800-9-OUTAGE (1-800-968-8243). Customers who use the text option to report outages also receive updates on the outage status both proactively and upon request.

Entergy's Customer Contact Center is staffed twenty-four hours every day. During normal business hours, the Customer Contact Center responds to all types of customer calls. During peak outage periods (such as during an emergency), an automated outage reporting system is used to handle outage calls. The automated outage reporting system is designed to handle large volumes of calls simultaneously, though customers may also opt to speak to a customer contact representative. During major storms, Customer Contact Center staffing levels are increased. The Customer Contact Center utilizes an escalation process which allows for complaints or escalated issues to be routed to the appropriate personnel.

ETI's Regulatory Affairs, Public Affairs, Customer Service and other customer facing teams are staffed and trained to communicate with the Commission, the Texas Division of Emergency Management, the Office of Public Utility Counsel, local and state officials, local emergency operations centers, and customers, including critical load customers. When conditions warrant, the ETI Regulatory Affairs and Public Affairs teams will proactively contact the appropriate Commission staff or Commissioners to keep them informed before, during, and after an event. Information provided will include, but not limited to, the number of customers affected, the estimated time of restoration, and any significant operational or resource issues. Additionally, ETI personnel may be contacted by the Commission at the listed numbers and emails in See section II.B. of ETI's EOP as needed.

Entergy's Transmission Control Centers are staffed and trained to communicate with the Midcontinent Independent System Operator ("MISO") as conditions warrant before, during, and after an event.

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[1] The Entergy Storm Center can be found at the following link: http://stormcenter.entergy.com/index.aspx?Region=TX.

[2] ETI's View Outages Maps can be found at the following link: http://www.etrviewoutage.com/external/tx.aspx.

Entergy's Energy Management Organization is staffed and trained to communicate with ETI's generation fuel suppliers as conditions warrant before, during, and after an event.

C. Maintaining Pre-Identified Supplies for Emergency Response: 25.53(d)(3)

Transmission and Distribution

For its transmission and distribution organizations, ETI maintains sufficient inventories to support ongoing construction and operation of the electrical system, as well as emergency inventories to be used in the event of a natural disaster or disruptions to electrical service to customers. Inventory is maintained at local crew service centers throughout the ETI service area to facilitate immediate response. ETI maintains a dedicated separate emergency storm stock in warehouses throughout its service area, including at its Beaumont Distribution Center. In addition, Entergy maintains four large distribution and transmission central warehouses to provide inventory and support to the various service areas or crew staging sites in the event of a larger outage.

Inventories are adjusted during the spring and summer to handle anticipated increase in demand due to storm emergencies. Plans are in place and monitored to assess inventory necessary to replace transformers, circuit breakers, substations, and other components of the transmission and distribution electrical infrastructure that may be damaged during an emergency.

Generation

The organization that supports ETI's generation facilities, Entergy Power Generation, maintains inventories at each plant site to support ongoing plant operation as well as additional inventories of key supplies for emergency operations, including food and water for plant staff, gasoline, lubricating oil, hydrogen, nitrogen, propane, and carbon dioxide. Inventories for other items or materials that would present a considerable problem if supply channels should be interrupted for several days or longer are also maintained. Inventories are checked and adjusted during the spring and summer to handle anticipated demand due to storm emergencies.

Entergy also works with all major suppliers to review their emergency plans and to ensure they have the capacity to produce additional materials in the event of a major storm.

D. Staffing During Emergency Response: 25.53(d)(4)

Transmission and Distribution

All of Entergy's transmission and distribution organizations have a structured emergency organization to ensure the orderly transition of processes and staffing from routine business operations to emergency operations and restoration in the event of either the threat or impact of severe weather, other natural disaster and/or security related events. Entergy has adopted the National Incident Management System ("NIMS") basic Incident Command System ("ICS") structure, terminology, and philosophy that is used for all operating companies, including ETI. The plan includes customized variances and cultural terminology in lower levels of the emergency organization to facilitate efficient implementation and operations.

Entergy has six system operation centers staffed twenty-four hours a day for operating the transmission and distribution systems, including during emergencies. There are four Distribution Operations Centers ("DOC"), located in Beaumont, Texas; Baton Rouge, Louisiana; Jackson, Mississippi; and Little Rock, Arkansas. The DOC located in Beaumont has primary responsibility for ETI's distribution system. However, all four DOCs have the capability of backing each other up as necessary. There are two Transmission Control Centers ("TCC"), located in Jackson, Mississippi and in Little Rock, Arkansas. The TCCs operate as back-ups to each other and serve as the North American Electric Reliability Corporation Transmission Operator for the transmission system.

Entergy Texas maintains contact listings for the other operating companies for use in supplemental staffing when necessary to respond to large events or predicted major weather events (*e.g.*, hurricane or ice storm). Additionally, individual local network service centers maintain call-out lists for line workers, vegetation workers, supervision and support. The DOC and TCC maintain rotational rosters due to their 24/7 operations. ETI also uses electronic messaging systems to notify managers and supervisors of pending severe weather threat or impacts or when additional personnel are needed for significant events. Entergy also maintains memberships with several Mutual Assistance groups for supplemental staffing to respond as needed to major events.

Generation

Entergy Power Generation has emergency operations plans that include a "Command and Control" structure to ensure the orderly transition of processes and staffing from routine business operations to emergency operations and restoration in the event of either the threat or impact of severe weather, other natural disasters and/or security related events to ETI's generation plants and generation-related infrastructure and equipment. Entergy's Incident Response Center ("IRC") and plants are staffed twenty-four hours-a-day during emergencies. The Entergy Power Generation emergency operations plan also includes contact information for other internal and external Emergency Operation Centers.

Entergy Power Generation also utilizes electronic messaging systems to notify management and emergency response personnel of pending severe weather threat or impacts and when additional personnel are needed for significant storms.

E. Identification of Weather-Related Hazards: 25.53(d)(5)

Entergy contracts with a professional meteorological firm for the monitoring and identification of potentially severe weather events, including but not limited to tornadoes, severe cold weather, severe hot weather, flooding, and hurricanes. Entergy is provided daily forecasts that describe severe weather conditions expected for the next seven days. Additionally, threat alerts for events outside of the seven-day window are provided as necessary. In the event severe weather is imminent, Entergy will receive a notification from the weather service that will trigger readiness activities, which includes advisement from the DOC and/or State Operations regarding the severity, timing, and duration of forecasted weather event. Entergy will receive proactive alerts that contain any National Weather Service severe weather advisory bulletins (watches/warnings). Entergy has the ability to consult with a meteorologist from its contractor twenty-four hours-a-

day. Entergy is able to monitor detailed weather information at any time through a password protected site provided by its contracted weather firm. Information on this site is continually updated as new forecasts are published. Before a potential weather-related event, the IRC coordinator is responsible for monitoring any possible weather conditions that may affect ETI's service territory and issues various alerts to trigger the appropriate response and implementation of ETI's EOP as conditions arise.

Each generating facility has site-specific emergency plans and procedures that address protective measures, operating limits, and staffing required to operate the plant under adverse weather conditions. These site-specific emergency plans also contain information regarding the supplies and consumables needed to be secured prior to an emergency event.

IV. Annexes: 25.53(e)

A. ETI Transmission, Distribution and Generation Facilities: Common Subsections of 25.53(e)(1) and (2)

1. Pandemic and epidemic: 25.53(e)(1)(C) and 25.53(e)(2)(D)

For pandemic and epidemic response, ETI relies on the Entergy System Pandemic Incident-Specific Response Plan, which is a major component of Entergy's overall System Incident Response Plan. The Pandemic Incident-Specific Response Plan, which also is applicable to an epidemic, is intended to provide the basic structure, procedures, guidelines, responsibilities, and reference data necessary for appropriate stages of pandemic preparedness and response. This plan is separate and distinct from the scope of the all-hazards Utility Incident Response Plan and storm incident-specific response plan. The System Pandemic Incident-Specific Plan is not intended to replace or interfere with the planning and execution of those specific operating company plans, but to augment them. The Pandemic plan will be reviewed and revised, as needed, on at least an annual basis prior to June 1 of each year.

The purposes and objectives of this plan are to:

- Emergency management organization: Establish an emergency management organization to respond to pandemic flu triggered events in a rapid and orderly manner in an effort to reduce or minimize the risk of infection to employees, employees' families, Entergy retirees, and others.
- Business continuity resources and planning: Provide information and resources to employees and Entergy's various business functions; minimize the risk of infection to our workers; to maintain business continuity; and by supporting appropriate safety and health objectives.
- Communications and liaisons: Provide for the accumulation and dissemination to Entergy's management, employees, retirees, other on-site workers, and the general public, accurate and timely information regarding the extent of a pandemic's impact to Entergy operations and any significant business interruption. This will include information regarding the progress being made in maintaining a healthy work environment and assisting business function(s) in maintaining business continuity. It will also include the establishment of any necessary liaisons between Entergy's Pandemic teams, local, state, and federal health agencies, and the media.

The Pandemic Incident-Specific Response Plan specifies the organizational structure, responsibilities, and procedures to be followed when the System Incident Commander declares that a major pandemic emergency either exists or is anticipated. When this plan is activated, an Incident Command Structure outlined in the System Pandemic Incident-Specific Plan will coordinate actions to mitigate pandemic effects on Entergy.

The Pandemic Incident-Specific Response Plan and the specialized Utility Incident Response Plan will be used to respond to a pandemic event. Each individual business function is responsible for identifying, securing and/or providing resources and services for operating their business function under emergency conditions. Each business function's management is responsible for proper training, directing, and coordinating activities to ensure business continuity within their areas.

ETI designates the Pandemic Incident-Specific Response Plan as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

2. Hurricane: 25.53(e)(1)(E) and 25.53(e)(2)(E)

Transmission and Distribution

For ETI's transmission and distribution organizations, ETI's evacuation and re-entry procedures for hurricanes include plans to relocate vehicles, materials, and personnel from facilities located within Hurricane Evacuation zones to facilities outside of these zones until the storm passes and personnel can re-enter to begin restoration activities. ETI has identified sites for relocated vehicles and has logistics plans in place for all relocated employees. ETI's procedures also include processes for communicating with state and local emergency management officials to ensure a coordinated re-entry effort.

ETI designates its specific evacuation and re-entry procedures as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

Generation

Each ETI generation plant has a site-specific Plant Hurricane Procedure and follows the Power Generation Incident Response Plan and directions from the IRC in coordination with the System Command Center with regards to evacuation and re-entry process and procedures following an emergency event.

ETI designates these site-specific procedures and Power Generation Incident Response Plan as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

3. Cyber and Physical security: 25.53(e)(1)(F) and (G) and 25.53(e)(2)(F) and (G)

ETI's EOP related to cyber security and physical security is an enterprise security program with dedicated staff and resources to address reduction of the likelihood and potential impact of cyber security or physical security risks. The cyber security and physical security aspects of ETI's EOP contains threat intelligence for detection and remediation, a comprehensive security risk management program, holistic 24/7 security monitoring, and independent third-party security assessments. The cyber security and physical security aspects of ETI's EOP also has a change management program, reconciliation controls for key financial information, logging and alerting for system changes and comprehensive backup schedules.

All ETI employees and contractors are required to complete a series of annual training modules covering core topics, including email and internet security, protection of information, and cyber security fundamentals. All end-users are included in monthly internal phishing campaigns for greater training and awareness around the email attack vector and social engineering tactics. Frequent awareness campaigns are conducted to keep current security topics in front of the user base, with reminders and infographics with the who, what, and how to report suspicious cyber security or physical security activity.

For security prevention detection, ETI uses an in-depth approach. Several layers of defensive technology are in place to prevent malicious activity and malicious actors from gaining access to the ETI and Entergy networks and network resources. Additionally, Entergy has a holistic 24/7 security monitoring program that works to leverage an industry-leading Security Incident and Event Management ("SEIM") solution. The SEIM is integrated with enterprise assets and has alerting and correlation rules that allow for efficient triage and response.

If a cyber security-related incident were to occur, Entergy has a corporate-wide cyber incident response plan. This cyber security incident response plan is exercised annually. The intent of this plan is for Entergy to be able to rapidly respond to and recover from a cyber security-related event. Additionally, an industry-leading security firm is on retainer should additional professional security services be needed during the post-event recovery or restoration phases.

Entergy has a dedicated team managing alerts from a world-class, global threat intelligence platform. Additionally, Energy participates in industry information sharing programs and leverages the assistance of trusted external partners, such as the United States Department of Homeland Security, the Federal Bureau of Investigations, Information Sharing and Analysis Centers, and local law enforcement.

ETI designates its Cyber security annex and Physical security annex as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

4. ETI Transmission and Distribution Facilities: 25.53(e)(1)

a. Weather Emergency: 25.53(e)(1)(A)

ETI designates its Transmission and Distribution Facilities Weather Emergency annex as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission

Staff.

b. Load Shed: 25.53(e)(1)(B)

ETI designates its Load Shed annex as confidential. In compliance with 16 Tex. Admin. Code § 25.53(c)(1)(D), ETI will make this information available to Commission Staff upon request at a location designated by Commission Staff.

MISO and Entergy have operating procedures designed to ensure reliability. Prior to any controlled load shed, if there is enough time, a series of steps will be taken to avoid shedding of firm load. In situations when load shed is not avoidable the procedures below are followed.

i. Procedures for controlled shedding of load: 25.53(e)(1)(B)(i)

The Entergy Emergency Load Shed Process provides the approved steps and actions Entergy will execute when load curtailments are necessary. The purpose of this procedure is to provide an orderly and equitable process for reducing customer demand whenever demand reductions are necessary. This procedure forms Entergy's plans to mitigate operating emergencies for insufficient generating capacity and for managing significant curtailment and Load Shed events that have either system wide or local area impacts. ETI is a member of MISO. MISO is responsible for determining, declaring, and communicating when a capacity or energy emergency is forecasted, occurring, or has ended in the MISO Balancing Authority Area ("MBAA"). MISO is required to provide instructions to Local Balancing Authorities ("LBAs"), Transmission Operators ("TOPs"), Generation Operators ("GOPs"), and Market Participants ("MPs") to manage capacity or energy emergencies. The TCC, acting on behalf of the TOP, can order curtailments of firm and/or curtailable loads during a shortage of capacity in a local area or that would cause line overloads or low voltage problems in that area. The procedure provides the LBA and the TOP located at the TCC the processes needed for implementing capacity emergencies or load shedding directives to adequately respond to emergencies. The Jurisdictional Response Team ("JRT") process will be implemented accordingly. The purpose of the JRT team is to review potential local area Load Shed events and develop action plans to implement in the case of an actual Load Shed event.

ii. Priorities for restoring shed load to service: 25.53(e)(1)(B)(ii)

ETI's basic principles governing restoration include the safety of the general public and restoration workers, leveraging Entergy system resources from the four-state service territory, and if necessary, acquisition and deployment of off-system resources. The status of restoration and important customer information will be communicated in a timely manner using the Communication Plan discussed in Section III.A.B. (25.53(d)(2)(A) and (B)).

Differences in specific regulatory guidance may result in limited exceptions to system strategies by the different legal entities, operating companies, and business functions; however, in general, system restoration strategy includes the following as applicable for the event:

- Safety of the general public and restoration workers is the highest priority of restoration and operations activities.

- Provision of system coordination, oversight, and support while allowing local operations to manage emergency restoration and operations. Common Entergy procedures and philosophies are used, with the recognition that there may be limited unique requirements in different operating areas and business units.
- Utilization of concepts of the Incident Command System to coordinate and leverage efficiency in system restoration including restoration priorities, resources, and support.
- Provision of restoration "mutual assistance" to other utilities in order to influence obligation of other utilities to provide assistance to Entergy when requested.
- Monitor and forecast of threatening emergency conditions. Alerts to management, employees, contractors, and suppliers of potential conditions and damages before impact. Actions taken to prepare proactively for response, including activating command centers, evacuating coastal areas, pre-positioning resources, or acquiring and deploying resources to be in position for timely restoration activities as deemed appropriate.
- Restoration of generation, stabilization of the grid and restoration of service critical to public safety and service. Restoration of the largest numbers of customers down to restoration of single customers.

iii. Registry of critical load customers: 25.53(e)(1)(B)(iii)

All Feeders on the ETI electric system are analyzed annually to determine the types of critical load served. As part of this process, ETI identifies critical load customers (*e.g.*, hospitals, police stations, fire stations, certain residential customers), critical natural gas facilities, critical water facilities and certain medical facilities.

When a customer has been identified as a critical load customer, that customer's account is coded with a critical load customer code and becomes part of the customer's account record within the ETI Customer Care System ("CCS"). The CCS serves as the registry of critical load customers. This CCS critical load registry is updated semi-annually in response to requests received to assign or renew critical designation for a customer. The critical load designation in the registry will be removed from Critical Care Residential Customers when the customer moves from the premise or when the designation expires without renewal. For other critical loads, the designation will remain until information is received requiring modification or removal.

When a service interruption is reported, the critical load customer identification is made from the customer account records and is associated with an outage event in the outage management system used by ETI to manage restoration activities. Critical load customers are a priority for restoration of service and ETI will pursue priority service restoration while also taking into account outage devices affecting large numbers of customers.

Additional contact with critical load customers may be made by Company personnel to notify them of the approximate length and severity of an outage, or to confirm that service has been restored. Interaction and communication with critical load customers are considered part of ETI's daily business operation. The processes for handling critical load customers are addressed in written procedures for ETI employees who engage with those customers. Those employees who have responsibilities related to critical load customers receive training, including on-the-job training, related to those responsibilities.

Wildfire: 25.53(e)(1)(D)

ETI takes a proactive approach to mitigate the risk of wildfires on its transmission and distribution facilities. ETI conducts vegetation management activities in order to ensure that vegetation clearances, both floor and side, are sustained through cycle and hot spot maintenance to reduce the risk of causing or fueling wildfires.

Entergy vehicles are equipped with fire extinguishers. Steps are taken to minimize possible ignition sources and ensure immediate identification of such ignition sources during maintenance and construction activities.

Entergy has an email alert distribution process in place in case of a National Weather Service notification, including the red flag warnings that are issued by county when the National Fire Danger Rating System identifies potential wildfire conditions.

5. Additional annexes: 25.53(e)(1)(I)

ETI does not have any additional annexes.

B. ETI Generation Operations in Texas: 25.53(e)(2)

1. Weather Emergency: 25.53(e)(2)(A)

a. Operational Plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title: 25.53(e)(2)(A)(i)

Entergy contracts with a meteorological firm for the identification of potentially severe weather events, including but not limited to tornadoes, severe cold weather, severe hot weather, flooding and hurricanes. Before a potential weather-related event, the Power Generation IRC coordinator is responsible for monitoring any possible weather conditions that may affect ETI's service territory and issues various alerts to trigger plant response and implementation of plant specific procedure as conditions arise. Each generating facility has site-specific incident plans and procedures that address the required protective measures, operating limits, and staffing required to operate the plant under adverse weather conditions, as well as the supplies and consumables needed to be secured prior to the emergency event.

ETI's generation facilities' Power Plant Managers and staff are responsible for the safe and reliable operation of the plant during adverse weather or freezing conditions. The Power Plant Managers are required to assist with coordinating all communications between the plant and the IRC, System Planning, other Entergy Business Units, regional load controllers, other company facilities, and state/area Emergency Management Departments, as required.

b. Verification of the adequacy and operability of fuel switching equipment, if installed: 25.53(e)(2)(A)(ii)

ETI's plants do not have alternative fuel capabilities at this time.

c. Checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency: 25.53(e)(2)(A)(iii)

Entergy Power Generation's Incident Response Plan, as well as each of ETI's generation plant's specific emergency operations plans, contains checklists for key activities that need to take place before, during, and after emergency events.

The checklists include conducting tabletop drills which require checking emergency communications equipment, such as plant satellite and cell phones, and contacting local authority and emergency officials to ensure an efficient and effective response during an emergency event. ETI's generation plant personnel also review and maintain familiarity with abnormal operating procedures such as Unit Islanding, Black Start, and Constant Frequency Operation.

The plans contain specific checklists for various roles within the IRC such as internal and external communications and notifications. The plant-specific plans also include checklists in the areas of Operational, Maintenance, Safety, Environmental, Storeroom, Administrative, and Personnel. There are also procedures and checklists for activities following an event, such as setting up an emergency response assessment team, acquiring the appropriate credentials and identification for travel to and from restricted sites, ensuring any building or facilities are safe for reentry and documenting key decisions, and lessons learned to improve processes going forward.

2. Water Shortage: 25.53(e)(2)(B)

Entergy has contracts in place with local water authorities that address supply options under different levels of drought contingency. ETI's generation plants have been evaluated for processes that can be modified to optimize water usage and take advantage of any recycle/reuse opportunities to offset water shortage conditions.

3. Restoration of Generation: 25.53(e)(2)(C)

In case of widespread emergency outages due to weather related events, ETI's EOP will be implemented, a command center will be established, and restoration will proceed according to the Emergency Plans for transmission and distribution.

In the case of a widespread blackout, the system restoration policies and guidelines are found in the Blackstart and System Restoration Plans. These plans were developed to safely restore the system at the earliest possible time with minimum equipment damage and minimum customer inconvenience.

Coordination of blackstart restoration is under the authority of Entergy's TCC, working in conjunction with the MISO Reliability Coordinator ("RC"). Following a partial or total blackout, the TCC will determine the extent of the blackout, and will provide direction, administration, and coordination of the restoration plan. Analyses will be done if required by MISO RC, Entergy Power Generation, or the Entergy Transmission Engineering system protection personnel to

determine the adequacy of the relaying and control for synchronizing generators and restoring islands. Transmission Operational Planning and Transmission Planning groups will also perform analyses to determine the voltage regulator settings for the generators, the reactive power requirements for the area, and will propose any necessary changes in the network configuration in order to allow for system restoration following complete blackout.

4. Additional annexes: 25.53(e)(2)(H)

ETI does not have any additional annexes.

V. Drills: 25.53(f)

Entergy conducts a system level drill, usually on an annual basis, with participation by each operating company, including Entergy Texas. In addition, Entergy Texas typically conducts a state level drill in conjunction with the system level drill to verify emergency procedures both internally within the state and externally with other Entergy operating companies/system level command staff. The drill is typically a hurricane scenario, which is used to test the Entergy Texas hurricane plan. ETI will notify Commission Staff and the appropriate TDEM District Coordinators regarding the date, time, and location of the state-level drill at least 30 days prior to the date of the drill.

All drills stress use of the Entergy System and Utility Incident Response Plans (*i.e.*, Emergency Operations Plan) and include participation by the transmission, distribution, and generation functions. Lessons learned are captured from each drill and are used to refine the incident response plan(s). In addition to these drills, ETI tests the functions of other processes. For example, Entergy utilizes winter readiness training at all ETI generating sites, which includes scenario-based drills.

VI. Reporting Requirements: 25.53(g)

ETI, upon request by Commission Staff during an activation of the State Operations Center by Texas Division of Emergency Management, will provide updates on the status of its operations, outages, and restoration efforts. ETI will continue its updates until all ETI event-related outages are restored to ETI's customers who can safely be restored or unless otherwise notified by Commission Staff. Upon request by Commission Staff, ETI will also provide an after action or lessons learned report and file it with the Commission as required by Commission Staff.

VII. Sections of 25.53 not applicable

The following sections of 16 TAC § 25.53 are not applicable to ETI and have not been addressed in this EOP. These sections are applicable to ERCOT and ERCOT entities:

- (c)(1)(B) and (C);
- (c)(2);
- (c)(3)(A)(iii) and (D);
- (c)(5);
- (d)(2)(C) and (D);

- (e)(1)(H);
- (e)(3); and
- (e)(4).

ETI is not filing a joint EOP on behalf of itself and another entity as permitted in 16 TAC §§ 25.53(c)(1)(E) and (F).

AFFIDAVIT OF ELIECER VIAMONTES

STATE OF TEXAS §
§
COUNTY OF MONTGOMERY §

BEFORE ME, the undersigned authority, on this day personally appeared Eliecer Viamontes, who being by me first duly sworn, on oath, deposed and said the following:

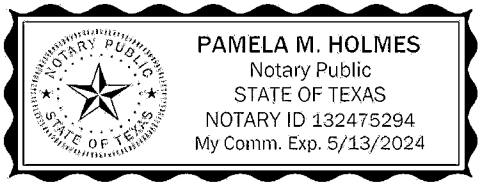
1. "My name is Eliecer Viamontes, and I am employed by Entergy Texas, Inc. ("ETI") as the President and Chief Executive Officer. I am filing this affidavit on behalf of ETI. I am over the age of 18 years and of sound mind. My statements in this affidavit are based upon personal knowledge and are true and correct.
2. I am the highest-ranking officer with binding authority over ETI and affirm the following:
    a. "The relevant operating personnel are familiar with and have received training on the applicable contents and execution of ETI's Emergency Operation Plan ("EOP"), and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
    b. The EOP has been reviewed and approved by the appropriate executives;
    c. Drills will be conducted to the extent required by subsection (f) of 16 Tex. Admin. Code § 25.53;
    d. The EOP or an appropriate summary will be distributed to local jurisdictions, as needed;
    e. ETI maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
    f. ETI'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-00, IS-200, IS-700, and IS-800 National Incident Management System training or will receive such training by June 1, 2022."

Eliecer Viamontes

State of Texas

County of Fort Bend

Subscribed and sworn to before me today, April 18th, 2022.



This notarial act was an online notarization

Pamela M. Holmes

Notary Public, in and for the State of Texas