



## Filing Receipt

**Received - 2022-04-18 02:18:13 PM**  
**Control Number - 53385**  
**ItemNumber - 329**

**Calpine Corporation**  
**Joint Emergency Operations Plan: Executive Summary<sup>1</sup>**

Pursuant to 16 Tex. Admin. Code (“TAC”) § 25.53(c)(A)(i)(a)-(e) the following is an executive summary of the joint Emergency Operations Plan (“EOP”) for Calpine Corporation’s power generation company assets (“PGC”), PGC Registration Number 20008, and retail electric providers (“REPs”), Champion Energy Services, LLC, REP Certificate Number 10098, Calpine Energy Solutions, LLC, REP Certificate Number 10017, and Calpine PowerAmerica, LLC, REP Certificate Number 10015, (together, “Calpine”). Pursuant to the EOP statute, simultaneously with the filing of this Executive Summary with the PUCT, a complete copy of the EOP with all confidential portions removed is filed with the PUCT and an unredacted EOP in its entirety is filed with ERCOT.

In compliance with Section 25.53(c)(A)(i)(a), the EOP contains the following:

**I. EOP Approval and Implementation Section.**

Calpine’s EOP submittal contains an Approval and Implementation section which introduces the EOP and outlines its applicability by providing annexes which detail how Calpine plans and prepares for, responds to, and recovers from an emergency situation. These policies are a subset of the comprehensive other plans, policies, and procedures that govern Calpine’s operations.<sup>2</sup> The Approval and Implementation section of the EOP also lists the individuals responsible for maintaining and implementing the various policies, plans and procedures that comprise the EOP; provides a revision control summary that lists the dates of each change that was made to the various plans, policies and procedures that comprise the EOP; provides a dated statement that the current EOP supersedes any previous EOPs; and states the date the EOP was most recently approved by Calpine.

The EOP’s Approval and Implementation section applies to the PGC and REPs.

**II. A Communication Plan.**

Calpine’s EOP contains an Emergency Communications Procedure which describes the procedures used to communicate with all external audiences regarding emergencies and other incidents involving Calpine, including communicating with the media, the commission, OPUC, fuel suppliers, customers, local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity, ERCOT, and responding to customer complaints during emergencies. This procedure is in addition to Calpine’s various other communications policies, including the Media Response and External Communication Policy and the Social Media Policy, which govern various aspects of Calpine’s external communications. In short, before, during and after an emergency situation the PGC and REPs will provide a variety of information to their respective external stakeholders through a diverse set of processes which vary from pre-event alert notifications, to real-time updates, to post-event updates on emergency response efforts. Calpine’s overarching communication objective during an emergency is that there is a single, unified and accurate message from all company sources which accurately portrays the state of the emergency, Calpine’s emergency response efforts, and associated recovery expectations to each external stakeholder group. Calpine accomplishes this through communication to the public, media, and customers via Calpine’s website, Twitter and Facebook pages, graphically displaying an outage map on the

<sup>1</sup>Confidential – Information Protected Pursuant to 16 TAC § 22.71(d); 16 TAC § 25.362; ERCOT Protocol 1.3 Tex. Gov. Code § 552.101 (under Texas Homeland Security Act) and § 552.110

<sup>2</sup> For example, Calpine employs robust environmental, health and safety programs, including an EHS Emergency Response Plan.

REPs website, increasing call center staffing during emergencies, escalating customer complaints during emergencies and logging them for post-event evaluation and lessons learned, staying in contact with fuel suppliers prior to and during an emergency event to ensure continuous communications regarding fuel supply, and keeping ERCOT, the PUCT, and OPUC apprised of any interruption involving a Calpine facility by providing real-time updates in accordance with ERCOT protocols.

The Emergency Communications Procedure, the Media Response and External Communication Policy, and Social Media Policy apply to the PGC and the REPs and may be supplemented by internal processes within each business unit.

### **III. A Plan to Maintain Pre-Identified Supplies for Emergency Response.**

For the PGC, Calpine has robust emergency supply requirements contained in each of its plant specific Winter and Summer Readiness Plans (collectively, the “Seasonal Readiness Plans”) and plant specific PGC Hurricane Plans. To compliment these plans, Calpine has a PGC Procedure to Maintain Pre-Identified Supplies for Emergencies. Under both plans and the procedure, Calpine reviews contingency work packages to ensure packages are complete and parts are available if any operational issues should arise due to an emergency. Also, pursuant to all three documents each Calpine facility has a pre-identified emergency supply inventory list that is monitored, reviewed, and updated as needed.

Similarly, the REPs have a REPs Procedure to Maintain Pre-Identified Supplies for Emergencies which describe its procedure associated with maintaining pre-identified emergency supply inventory lists that are monitored, reviewed, and updated as needed.

The PGC Procedure to Maintain Pre-Identified Supplies for Emergencies, Seasonal Readiness Plans and the plant specific Hurricane Plans apply to the PGC and the REPs Procedure to Maintain Pre-Identified Supplies for Emergencies applies to the REPs.

### **IV. A Plan that Addresses Staffing During Emergency Response.**

Safety is a core value at Calpine. Accordingly, during any severe weather event safety is the highest priority. For the PGC, Calpine maintains specific emergency staffing requirements in the plant specific Seasonal Readiness Plans, plant specific Hurricane Plans, PGC Pandemic and Epidemic Plan, and Inclement Weather and Natural Disaster Pay Policy. Additionally, Calpine has established a PGC Emergency Staffing Procedure which provides procedures for maintaining proper staffing to ensure safe and efficient emergency response which helps to facilitate continuous operations before, during, and after an emergency event.

Similarly, the REPs have a REPs Emergency Staff Procedure which describes its procedure associated with maintaining staffing levels necessary for emergency response which is supplemented by the Inclement Weather and Natural Disaster Pay Policy.

The PGC Emergency Staffing Procedure applies to the PGC and the REPs Emergency Staffing Procedure applies to the REPs.

### **V. How Calpine Identifies Weather-Related Hazards.**

The PGC Procedure for the Identification of Weather Related Hazards is supplemented by the Seasonal Readiness Plans and PGC Hurricane Plans and collectively detail how the PGC identifies potentially severe weather events, including, extreme cold weather, extreme hot weather, tornadoes,

hurricanes, drought, and flooding. Each plan and the procedure provides instructions relating to specific events.

Similarly, the REPs Procedure for the Identification of Weather Related Hazards is supplemented by the corporate/REPs Hurricane Plan and collectively detail how the REPs identify potentially severe weather events.

In addition to these plans, Calpine employs a meteorologist and uses state of the art weather applications to monitor and forecast current and future weather patterns. Further, for the PGC, the plant specific Seasonal Readiness Plans and the both entities' Hurricane Plans, establish that Calpine's meteorologist will provide updates and alerts to specific teams of any extreme cold, extreme hot or hurricane related issues via email during the winter, summer and hurricane seasons. Those plans also establish a process for creating a situational assessment. Moreover, Calpine staff members monitor the weather 24 hours, seven (7) days a week and daily weather updates are provided. Hourly, daily, weekly, and monthly forecasts and weather behavioral trends are some of the parameters used to monitor the weather conditions.

The PGC Procedure for the Identification of Weather Related Hazards, the PGC plant specific Hurricane Plans, and plant specific Seasonal Readiness Plans apply to the PGC. The REPs Procedure for the Identification of Weather Related Hazards and Corporate/REPs Hurricane Plan apply to the REPs.

a. **Tornadoes.**

For the PGC, the PGC Procedure for the Identification of Weather Related Hazards, the on-shift control room operator monitors weather conditions and notifies the plant manager when a tornado watch or tornado warning has been issued in the area by the National Weather Center. When a tornado threat is imminent (tornado warning has been issued in the immediate area), employees and contractors are notified to assemble within the designated safe assembly area (as defined in the PGC Procedure for the Identification of Weather Related Hazards) until the all clear has been given. The plant manager or his designee shall determine when the threat has passed and sounds the all clear. After the all clear has been sounded, the plant manager or his designee shall obtain an accurate head count of personnel and contractors, assess if any personnel or contractors have received injuries that require first aid or medical treatment, and begin efforts to inspect the facility for damage and develop a plan to return to normal operations.

Under the REPs Procedure for the Identification of Weather Related Hazards, Calpine's On-Shift Operations Lead monitors conditions for tornado warnings at the corporate headquarters and REP locations and notifies the senior management team if any actions need to be taken in response to such warning.

b. **Hurricanes.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards, hurricane response is addressed in each entities' Hurricane Plan which is discussed in detail below.

c. **Extreme Cold Weather/Extreme Hot Weather.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards, Calpine's meteorologist is tasked with monitoring daily reports by the National Weather Service for extreme cold or extreme hot weather conditions which could impact plant operations or the REPs. If such condition is identified, each respective procedure, along with other applicable Calpine plans, including the plant specific Seasonal Readiness Plans and Hurricane Plans provide direction to the PGC or REPs of the actions each entity needs to mitigate the impacts of such condition.

d. **Drought.**

Water is a vital component of the PGC's operations. Under the PGC Procedure for the Identification of Weather Related Hazards, each Calpine facility closely monitors precipitation, temperatures, river levels, and other key indicators to determine if drought conditions may impact its operations. If such conditions are projected, the impacted Calpine facility works collaboratively with the water supplier and reviews its Water Shortage Procedure to mitigate the impacts to operation.

Similarly, under the REPs Procedures for Identification of Weather Related Hazards drought conditions are monitored.

e. **Flooding.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards and the Hurricane Plans, rainfall and river levels are monitored for locations susceptible to flooding.

**VI. Process for Activating EOP.**

Calpine's EOP is not in effect at all times and does not govern routine outages or other events that occur day-to-day for the PGC or REPs due to equipment damage, minor or localized weather events, or other causes. Instead, the applicable components of the EOP are triggered when there is or could be an emergency event that could significantly impact or interrupt Calpine's operations.

**VII. Annexes.**

a. **Weather Emergency.**

Each Calpine facility maintains robust site specific Seasonal Readiness Plans which provide operational processes to prepare for and respond to a cold or hot weather emergency. To that end, each site's Seasonal Readiness Plan incorporates lessons learned from previous weather emergencies, ensures adequate supplies are available and contains Extreme Cold and Extreme Heat Weather checklists for generation personnel to utilize for protecting equipment and maintaining facility operation during a cold or hot weather emergency when outside temperatures are predicted to decrease below freezing or increase to levels that trigger a hot weather emergency notification.

All Calpine plants within ERCOT are single fueled, natural gas plants and, as such, Calpine does not have alternate fuel capability. However, Calpine's fuel supply arrangements on a fleet-wide basis include diverse contractual arrangements for firm and interruptible pipeline capacity rights that can access a number of natural gas storage facilities where firm supply is secured as needed. Additionally, Calpine also has contractual rights to storage with various natural gas storage providers.

The plant specific Seasonal Readiness Plans apply only to the PGC.

b. **Water Shortage.**

Pursuant to Calpine's Water Shortage Procedure, if there is a shortage of water, Calpine would, in accordance with good operating practices, take steps to conserve water usage by isolating all water sources not needed to continue to run the plant and evaluating all processes for the most efficient use of water. For example, such strategies will manage cooling tower blowdowns, demin water cycle blowdowns, and in severe cases, reduce plant load during non-critical system load periods including shutting down units to keep other units on-line for a longer duration. More specifically, the plants will coordinate water usage with system load to mitigate any impacts from generation losses as well as coordinating with water suppliers.

The procedure applies only to the PGC.

c. **Restoration of Service.**

Calpine is committed to restoring generation as safely and quickly as possible. Any Calpine generation resource that trips offline due to a real or perceived hazard would be investigated to confirm that the adverse condition causing the trip was corrected. Once remedied, Calpine would utilize its Conduct of Operating Standard to restart the unit and/or plant for its return to service, in addition to following all applicable ERCOT protocols.

The Conduct of Operating Standard applies only to the PGC.

d. **Pandemic and Epidemic.**

Calpine has PGC and corporate/REPs Pandemic and Epidemic Plans which are intended to provide guidance in response to a Pandemic or Epidemic Declaration by local health services, local emergency management, OSHA and/or the Center for Disease Control and Prevention (“CDC”). The plans provide comprehensive guidance and response to an event of pandemic or epidemic declaration and covers various topics including but not limited to, safe passage to and from work, shift turnover – hygiene and isolation, work practices, screenings, and program management, process controls, and tracking, sequestration readiness, morale and fatigue, return to work orientation guidance, state and local pandemic requirements and travel restrictions, Occupational Safety and Health Administration (“OSHA”) Guidance, vaccine, and best practices. As part of the plans, all Calpine sites are instructed to monitor their respective state or county health department advisories. In addition, the plans require management teams to continuously monitor cleaning supply inventories and coordinate with suppliers to retain adequate supplies at each site. All Calpine facilities are also required to use contact tracing and has policies in place if an individual has been exposed to COVID-19 or a similar disease, which policies are informed by local health services, local emergency management, OSHA and the CDC.

The PGC Pandemic and Epidemic Plan applies to the PGC and the corporate/REPs Pandemic and Epidemic Plan applies to the REPs.

e. **Hurricane.**

Some Calpine facilities, including the Calpine corporate headquarters, are in a hurricane evacuation zone, as defined by the Texas Division of Emergency Management (“TDEM”). As such, for those sites Calpine has plant specific PGC Hurricane Plans and corporate/REPs Hurricane Plans for all facilities in a hurricane evacuation zone, which includes evacuation and re-entry procedures for personnel at these locations. The purpose of both Hurricane Plans is to ensure that Calpine management has the information and notifications necessary to make informed decisions regarding the safety of Calpine’s power generation plants, corporate office employees (including REP employees) and contractors before, during, and after a hurricane.

For our ERCOT power generation fleet, the site specific PGC Hurricane Plans outline the steps to be taken to ensure the safety of our people and equipment. This includes the decision to continue operation of the facility during the storm or to shut down the facility for the safety and well-being of the plant staff. If the plant continues to operate, operating and maintenance personnel could be sequestered on-site. Each plant will review the expected storm surge, hurricane and flooding maps, and forecasted wind speed to assess preparations for readiness to any specific storm. Plants will subsequently prepare the site for any expected conditions. Special shift schedules will be posted and as required, periodic updates will be

provided. The health and safety of our personnel will always take precedence. The site specific PGC Hurricane Plans incorporate lessons learned from previous seasons as well as leading practices to assist Calpine in preparing employees and plants for approaching storms/hurricanes. The site specific PGC Hurricane Plans also identify the steps to return to normal operations.

For REPs and corporate function, the REPs Hurricane Plan outlines the steps to be taken to ensure the ongoing business needs of the company can be relocated to a geographically diverse site in a timely, well-orchestrated manner, in the event of a declared hurricane resulting in possible business interruption. The Hurricane Plan incorporates lessons learned from previous seasons as well as leading practices to assist Calpine in preparing employees and offices for approaching storms/hurricanes. Such preparation includes the implementation of an automated notification system. The corporate/REPs Hurricane Plan includes a detailed description of the responsibilities of each group in the event of a declared hurricane event, steps to be taken by these groups to ensure the safety of all Calpine personnel, communication and decision-making requirements, and information on alternate work sites. In addition, the corporate/REPs Hurricane Plan includes an Employee Hurricane Package to be distributed to all Calpine personnel prior to the hurricane season.

The site specific PGC Hurricane Plans apply to the PGC and the corporate/REPs Hurricane Plan applies to the REPs.

**f. A Cyber-Security Plan.** Calpine also has a checklist to address cyber-security threats (the “Cyber-Security Incident Response Plan”). The purpose of the Cyber-Security Incident Response Plan, and other plans such as the NERC Critical Infrastructure Protection Policy, is to respond to cyber-security incidents, which could impact plant operations and/or Calpine information systems. This includes and is not limited to: (1) identification, classification, and communication of a cyber-security incident; (2) identification and deployment of incident officer and applicable teams; and, (3) System restoration requirements, (4) Stored back up files and the restoration process. Calpine also runs rigorous system tests and period drills to test and where required, update the Cyber-Security Incident Response Plan. The Cyber Security Plan and process mandates that each employee will be observant of any malicious computer/electronic behaviors for signs of intrusions or malicious intent. Calpine employees, at specific facilities, REP locations, and corporate offices, have the responsibility to report unusual computer behaviors immediately upon suspicion of “unusual computing behavior.” Calpine regularly engages with federal agencies such as NERC and the Department of Homeland Security to review its cyber security incident response plan and conduct drills and maintains a program to ensure NERC compliance, including compliance with all NERC Critical Infrastructure Protection (“NERC-CIP”) requirements.

The plan applies to the PGC and the REPs.

**g. A Physical and Security Plan.** Calpine’s Physical and Security Incident Response Plan and PGC and Office Emergency Response Plans incorporate the following philosophy: manage, deter, detect, delay, and respond. Calpine takes measures to ensure the physical security and safety of employees, contract workers, visitors, and other individuals entering Calpine sites, including REP locations and corporate headquarters, and to comply with all applicable regulatory requirements for protecting critical systems. Calpine has established corporate wide program requirements as well as site requirements that apply to specific areas or locations within a site where an increased defensive posture is required to mitigate security threats and protect personnel. These plans include incorporation of various NERC-CIP requirements to prevent access to plant controls and critical infrastructure. Features include perimeter fencing, security cameras, restricted zones in the plant, background checks for critical site locations, and

security screening through the use of card readers. The plan also includes a Standard Implementation Checklist related to Physical Security Standards and a Site Level Security Incident Recording Checklist. Each location has specific requirements for muster areas in the event of an evacuation, responsibilities on response to medical emergencies, and actions for fire or other hazmat activities. The governance plan also includes instructions for how to react to threatening calls or activities such as (including a bomb threat checklist), a suspected bomb, workplace violence and civil disturbances, active shooter, chemical spills, gas releases, and elevator emergencies.

Incident handling and response is a distributed, cross-organizational effort. Certain physical security incidents may require the involvement of specialized internal/external personnel and the formation of the additional specific teams. In these situations, the BCMT leadership team, as well as Legal and Safety teams, to initiate a physical security incident response plan. Each plant will initiate the first actions to secure the plant and protect its personnel. Each incident or drill will have an after action review performed to determine if improvements or modifications are required for the process.

The plan applies to the PGC and the REPs.

## **II. Table of Contents.**

In compliance with Section 25.53(c)(1)(A)(i)(b), the following are the specific sections and page numbers of Calpine's EOP that correspond with the requirements of the Section 25.53(c):

<b>EOP Provision</b>	<b>EOP Provision Requirement</b>	<b>EOP Section/Page Number</b>
§25.53(d)(1)(A)-(E)	<p>An approval and implementation section that:</p> <ul style="list-style-type: none"> <li>▪ Introduces the EOP and outlines its applicability;</li> <li>▪ Lists the individuals responsible for maintaining the implementing the EOP, and those who can change the EOP;</li> <li>▪ Provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing;</li> <li>▪ Provides a dated statement that the current EOP suspends previous EOPs; and</li> <li>▪ States the date the EOP was most recently approved by the entity</li> </ul>	<p>Section I(a)-(c) (PGC and REPs) CAPLINE_EOP0001- CALPINE_EOP0007</p>
§25.53(d)(2)(B)-(C)	<p>A communication plan</p> <ul style="list-style-type: none"> <li>▪ Generation entity – must describe the procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator</li> </ul>	<p>Section II (PGC and REPs) CALPINE_EOP0007</p> <p>Exhibit C (PGC and REPs) CALPINE_EOP0020- CALPINE_EOP0036</p>

EOP Provision	EOP Provision Requirement	EOP Section/Page Number
	<ul style="list-style-type: none"> <li>▪ REP entity – must describe the procedures for communicating during an emergency with the public, media, customers, the commission, and OPUC, and the procedures for handling complaints during an emergency</li> </ul>	
§25.53(d)(3)	<ul style="list-style-type: none"> <li>▪ A plan to maintain pre-identified supplies for emergency response</li> </ul>	<p>Section III (PGC and REPs) CALPINE_EOP0007- CALPINE_EOP0008</p> <p>Exhibit D (PGC) CALPINE_EOP0037- CALPINE_EOP0039</p> <p>Exhibit E (REPs) CALPINE_EOP0040- CALPINE_EOP0042</p>
§25.53(d)(4)	<ul style="list-style-type: none"> <li>▪ A plan that addresses staffing during emergency response</li> </ul>	<p>Section IV CALPINE_EOP0008- CALPINE_EOP0008</p> <p>Exhibit F (PGC) CALPINE_EOP0043- CALPINE_EOP0046</p> <p>Exhibit G (REPs) CALPINE_EOP0047- CALPINE_EOP0050</p>
§25.53(d)(5)	<ul style="list-style-type: none"> <li>▪ A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP</li> </ul>	<p>Section V CALPINE_EOP0007- CALPINE_EOP0010</p> <p>Exhibit H (PGC) CALPINE_EOP0051- CALPINE_EOP0055</p> <p>Exhibit I (REP) CALPINE_EOP0056- CALPINE_EOP0060</p>
§25.53(e)(2)(A)	<p>A Generation resource/PGC must include:</p> <ul style="list-style-type: none"> <li>▪ A weather emergency annex that includes <ul style="list-style-type: none"> <li>• Operational plan for responding to a cold and hot weather emergency, distinct from the weather preparations required under § 25.55</li> <li>• Verification of the adequacy and operability of fuel switching equipment, if installed; and</li> <li>• A checklist for generation resource personnel to use during a cold or hot weather emergency</li> </ul> </li> </ul>	<p>Exhibit J, Annex 1 CALPINE_EOP0061- CALPINE_EOP0812-</p>

EOP Provision	EOP Provision Requirement	EOP Section/Page Number
	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)(B)	<ul style="list-style-type: none"> <li>▪ A water shortage annex that addresses supply shortages of water used in the generation of electricity;</li> </ul>	Exhibit J, Annex 2 CALPINE_EOP0813- CALPINE_EOP0816
§25.53(e)(2)(B) §25.53(e)(2)(C)	<ul style="list-style-type: none"> <li>▪ A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;</li> </ul>	Exhibit J, Annex 3 CALPINE_EOP0817- CALPINE_EOP0853-
§25.53(e)(2)(D)	<ul style="list-style-type: none"> <li>▪ A pandemic and epidemic annex;</li> </ul>	Exhibit J, Annex 4  (PGC) CALPINE_EOP0854- CALPINE_EOP1001
§25.53(e)(2)(E)	<ul style="list-style-type: none"> <li>▪ A hurricane annex that include evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;</li> </ul>	Exhibit J, Annex 5 CALPINE_EOP1019- CALPINE_EOP1191
§25.53(e)(2)(F)	<ul style="list-style-type: none"> <li>▪ A cyber security annex; and</li> </ul>	Exhibit J, Annex 6 CALPINE_EOP1212- CALPINE_EOP1236
§25.53(e)(2)(G)	<ul style="list-style-type: none"> <li>▪ A physical security incident annex</li> </ul>	Exhibit J, Annex 7 CALPINE_EOP1237- CALPINE_EOP1248
§25.53(e)(3)(A)	A REP must include: <ul style="list-style-type: none"> <li>▪ A pandemic and epidemic annex;</li> </ul>	Exhibit J, Annex 4 (REPs)  CALPINE_EOP1002- CALPINE_EOP1018
§25.53(e)(3)(B)	<ul style="list-style-type: none"> <li>▪ A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;</li> </ul>	Exhibit J, Annex 5 CALPINE_EOP1192- CALPINE_EOP1211
§25.53(e)(3)(C)	<ul style="list-style-type: none"> <li>▪ A cyber security annex; and</li> </ul>	Exhibit J, Annex 6 CALPINE_EOP1212- CALPINE_EOP1236
§25.53(e)(3)(D)	<ul style="list-style-type: none"> <li>▪ A physical security incident annex</li> </ul>	Exhibit J, Annex 7 CALPINE_EOP1237- CALPINE_EOP1248

### III. Record of Distribution and Training.

In compliance with Section 25.53(c)(1)(A)(i)(c) and 25.53(c)(4)(A)(i)-(ii), distribution is contained in Exhibit A.

#### IV. List of Primary and Backup Emergency Contacts.

In compliance with Sections 25.53(c)(1)(A)(i)(d) and 25.53(c)(4)(B), the PGC's and REPs primary and backup contacts who can immediately address urgent requests and questions from the PUCT are

<b>PGC Primary Emergency Contact</b>	<b>PGC Backup Emergency Contact</b>
<b>Name:</b> Brett Kerr	<b>Name:</b> Clint Sandidge
<b>Title:</b> VP-Governmental & Regulatory Affairs	<b>Title:</b> Managing Director
<b>Phone:</b> (713) 830-8809	<b>Phone:</b> (713) 361-7717
<b>E-mail:</b> brett.kerr@calpine.com	<b>E-mail:</b> clint.sandidge@calpinesolutions.com

<b>Champions/Calpine PowerAmerica Primary Contacts</b>	<b>Champions/Calpine PowerAmerica Primary Contacts</b>
<b>Name:</b> Clint Sandidge	<b>Name:</b> Alon Erlichman
<b>Title:</b> Managing Director	<b>Title:</b> Vice President of IT
<b>Phone:</b> (713) 361-7717	<b>Phone:</b> 281-653-5087
<b>E-mail:</b> clint.sandidge@calpinesolutions.com	<b>E-mail:</b> alon.erlichman@champion.com

<b>Solutions Primary Emergency Contact</b>	<b>Solutions Backup Emergency Contact</b>
<b>Name:</b> Clint Sandidge	<b>Name:</b> Mark Ruggles
<b>Title:</b> Managing Director	<b>Title:</b> Vice President, Pricing & Supply
<b>Phone:</b> (713) 361-7717	<b>Phone:</b> 713-361-7779
<b>E-mail:</b> clint.sandidge@calpinesolution.com	<b>E-mail:</b> mark.ruggles@calpinesolutions.com

#### V. Affidavits.

In compliance with Sections 25.53(c)(1)(A)(i)(d) and 25.53(c)(4)(C), an affidavit from the PGC's and REPs highest ranking representative, official, or officer with binding authority over the entities is attached confirming compliance with this rule is attached as **Exhibit B**.

**Exhibit A**

EOP Document	Titles and Names of Persons in the Organization Receiving Access to and Training on the EOP and Dates of Such Access and Training <sup>3</sup>
Media Response and External Communication Policy (CPN-540)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Media Response and External Communication Policy which is posted on Calpine's internal SharePoint site and applicable PGC senior management and Power Plant Managers were last trained on the policy on April 13, 2022.</p> <p>Similarly, the REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Media Response and External Communication Procedure, which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the policy on April 14, 2022.</p> <p>Additional training for any applicable personnel will be completed by December 31, 2022.</p>
Social Media Policy (CPN-545)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Social Media Policy which is posted on Calpine's internal SharePoint site and all applicable PGC employees receive annual training on the policy each October. The PGC's senior management and applicable PGC employees were last trained on the policy in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs' applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Social Media Policy, which is posted on Calpine's internal SharePoint site and all applicable REPs applicable senior management and employees receive annual training on the policy each October. The REPs applicable senior management and applicable REPs employees were last trained on the policy in October 2021. In accordance with the REP's annual training schedule, the REP's applicable senior management and applicable REP power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Emergency Communications Procedure (ER-CPN-001)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Emergency Communications Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable Power Plant Managers were last trained on the procedure on April 13, 2022.</p> <p>Similarly, the REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Emergency Communications Procedure, which is posted on Calpine's internal SharePoint site and the REPs applicable senior management and were last trained on the procedure on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

<sup>3</sup> Due to the voluminous nature of the training records for Calpine's hundreds of employees, as well as privacy concerns associated with providing employee names and identifying information, training information has been provided by employee category and title. Further information is available upon request.

PGC Procedure to Maintain Pre-Identified Supplies for Emergencies (ER-CPN-002)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs, have continuous access to the PGC Procedure to Maintain Pre-Identified Supplies for Emergencies which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan and PGC Pandemic and Epidemic Plan, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Procedure to Maintain Pre-Identified Supplies for Emergencies (CPN-REP-002)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including applicable Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Procedure to Maintain Pre-Identified Supplies for Emergencies, which is posted on Calpine's internal SharePoint site and the REPs senior management was last trained on the procedure, which complements the Corporate/REPs Hurricane Plan on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Plant Specific Seasonal Readiness Plans and Extreme Weather Checklist (Summer Checklist – ER-CPN-006) <sup>4</sup>	<p>All applicable Calpine PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Plant Specific Seasonal Readiness Plans and Extreme Weather Checklist and are trained prior to the start of the winter season (December 1) and summer season (June 1) on their plant's specific seasonal readiness plans and extreme weather checklist. The last winter training occurred prior to December 1, 2021 and the last summer training occurred prior to June 1, 2021. In accordance with the PGC's training schedule, the PGC's applicable senior management and applicable PGC power plant employees will be trained on the winter readiness policy again prior to December 1, 2022 and the summer readiness policy prior to June 1, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
PGC Emergency Staffing Procedure (ER-CPN-003)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Emergency Staffing Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan, PGC Pandemic and Epidemic Plan, and Inclement Weather and Natural Disaster Pay Policy, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Emergency Staffing Procedure (CPN-REP-003)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Emergency Staffing Procedure, which is posted on Calpine's internal SharePoint site and the applicable REPs senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan and the Inclement Weather and Natural Disaster Pay Policy, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

<sup>4</sup> Applicable Calpine reference number varies by facility.

PGC Procedure for Identification of Weather Related Hazards (ER-CPN-004)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Procedure for Identification of Weather Related Hazards which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan and PGC Pandemic and Epidemic Plan, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Procedure for Identification of Weather Related Hazards (CPN-REP-004)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Procedure for Identification of Weather Related Hazards which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Water Shortage Procedure (ER-CPN-005)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Water Shortage Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Conduct of Operations Standard	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Conduct of Operations Standard which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on April 13, 2022.</p>
PGC Pandemic and Epidemic Plan (Rev. 1, March 2020)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Pandemic and Epidemic Plan which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on March 7, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Corporate/REP Pandemic and Epidemic Plan (Rev. 1, March 2011)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Corporate/REPs Pandemic and Epidemic Plan which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Plant Specific PGC Hurricane Plan <sup>5</sup>	<p>The PGC's applicable employees, including Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs located at a Calpine power plants which are situated in hurricane evacuation zones, as defined by the Texas Division of Emergency Management (Baytown Energy Center, Channel Energy Center, Corpus Christi Energy Center, Deer Park Energy Center, Hidalgo Energy Center,</p>

<sup>5</sup> Applicable Calpine reference numbers vary by facility.

	<p>Jack A. Fusco Energy Center, Magic Valley Generating Station, Pasadena Power Plant, and Texas Plant) have continuous access to their site's Hurricane Plan. PGC employees at Baytown, Deer Park, Jack A. Fusco, and Pasadena were last trained on their site specific Hurricane Plans prior to June 1, 2021, the start of Hurricane Season. Prior to June 1, 2022, all applicable PGC power plant employees who are employed at a facility which is located within a hurricane zone will receive training on the site's Hurricane Plan.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Corporate/REPs Hurricane Plan (CPN-502)	<p>The REPs senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all active REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Corporate/REPs Hurricane Plan which is posted on Calpine's internal SharePoint site and the REPs' senior management team was trained on the plan on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Cyber-Security Incident Response Plan (Rev. 1, March 2015)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Cyber-Security Incident Response Plan which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable PGC senior management and applicable PGC employees occurred in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs' applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Cyber-Security Incident Response Policy, which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable REPs senior management and applicable REPs employees occurred in October 2021. In accordance with the REPs' annual training schedule, the REP's applicable senior management and applicable REP's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Physical Security Incident Response Plan (Rev. 1, Dec. 2020)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Physical Security Incident Response Plan which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable PGC senior management and applicable PGC employees occurred in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Physical Security Incident Response Plan, which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable REPs senior management and applicable REPs employees occurred in October 2021. In accordance with the REPs' annual training schedule, the REP's applicable senior management and applicable REP's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

In addition, pursuant to Section 25.55(c)(4)(C), the PGC and REPs ensure the following activities are complete:

Relevant EOP Provision	Activity
25.55(c)(4)(C)(i)	<p>The PGC and REPs applicable relevant operating personnel are familiar with and receive training on the applicable contents and execution of the EOP and those employees are instructed to follow the applicable portions of the EOP except to extent deviations are appropriate as a result of a specific circumstances during the course of any emergency.</p> <p>To the extent any training activities required by the EOP have not been completed on the date of this filing, the PGC and REPs will ensure such training is completed by December 31, 2022. Once those trainings are completed, Calpine will notify the Commission.</p>
25.55(c)(4)(C)(ii)	<p>The PGC and REPs applicable executive for each organization have reviewed and approved the EOP.</p> <p>Additional training and reviews for any applicable personnel will be completed by December 31, 2022.</p>
25.55(c)(4)(C)(iii)	<p>The PGC and REPs also regularly conduct drills regarding various procedures contained in the EOP and both further intend to conduct drills going forward consistent with subsection (f) of the PUC Subst. R. Section 25.53 and will provide notice to the Commission at least 30 days before that drill is conducted. Once such drill is conducted, the PGC and REPs will notify the Commission.</p>
25.55(c)(4)(C)(iv)	<p>The PGC and REPs are evaluating whether the new EOP statute requires them to distribute any additional content of the EOP (or an appropriate summary) to local jurisdictions. If the PGC or REPs determine that the new EOP statute requires additional distribution, it will distribute the EOP (or an appropriate summary) as may be necessary or required.</p>
25.55(c)(4)(C)(v)	<p>The PGC and REPs, through their EOP, maintain a business continuity plan that addresses return to normal operations after disruptions caused by an incident.</p>

25.55(c)(4)(C)(vi)	The PGC and REPs applicable employees who are designated to interact with local, state and federal emergency management officials during emergency events have received the latest IS-100 National Incident Management Training. Applicable PGC and REPs personnel who are designated to interact with local, state and federal emergency management officials during emergency events will receive the latest IS-200, IS-700, and IS-800 National Incident Management System training by December 31, 2022. Once those trainings are completed, Calpine will notify the Commission.
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**Exhibit B**

**Attestation**

## Emergency Operating Plan Submittal

### Sworn Attestation

**Power Generating Company:** Calpine Corporation (Power Generation Company Certificate No. 20008)

**Generation Resource(s):**

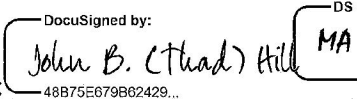
1. Baytown Energy Center: BTE\_BTE\_G1, BTE\_BTE\_G2, BTE\_BTE\_G3, BTE\_BTE\_G4
2. Bosque Energy Center: BOSQUESW\_BSQSU\_1; BOSQUESW\_BSQSU\_2; BOSQUESW\_BSQSU\_3; BOSQUESW\_BSQSU\_4; BOSQUESW\_BSQSU\_5
3. Channel Energy Center: CHE\_CHEST1, CHE\_CHEGT1, CHE\_GT2, CHE\_GT3
4. Corpus Christi Energy Center: CCEC\_GT1, CCEC\_GT2, CCEC\_ST1
5. Deer Park Energy Center: DDPEC\_ST1, DDPEC\_GT1, DDPEC\_GT2, DDPEC\_GT3, DDPEC\_GT4, DDPEC\_GT6
6. Freestone Energy Center: FREC\_GT1, FREC\_GT2, FREC\_ST3, FREC\_GT4, FREC\_GT5, FREC\_ST6
7. Guadalupe Energy Center: GUADG\_GAS1, GUADG\_GAS2, GUADG\_GAS3, GUADG\_GAS4, GAUDG\_STM5, GUADG\_STM6
8. Hidalgo Energy Center: DUKE\_DUKE\_ST1, DUKE\_DUKE\_GT1, DUKE\_DUKE\_GT2
9. Jack A. Fusco Energy Center: BVE\_UNIT1, BVE\_UNIT2, BVE\_UNIT3
10. Magic Valley Generation Station: NEDIN-NEDIN\_G1, NEDIN-NEDIN\_G2, NEDIN-NEDIN\_G3
11. Pasadena Power Plant: CAL\_CALGT1, CAL\_CALSTG1, PSG\_PSG\_GT2, PSG\_PSG\_GT3, PSG\_PSG\_ST2
12. Texas City Energy Center: TXCTY-CTA, TXCTY-CTB, TXCTY-CTC, TXCTY-ST

**Retail Electric Providers:** Calpine PowerAmerica, LLC (REP Certificate Number 10015)  
Champion Energy Services, LLC (REP Certificate Number 10098)  
Calpine Energy Solutions, LLC (REP Certificate Number 10017)

I attest that I am the highest-ranking representative, official, or officer with binding authority over the Power Generation Company (PGC) and Retail Electric Providers (REPs) identified above.

I hereby affirm, based on the best of my information, knowledge and belief that the statements contained in 16 Tex. Admin. Code § 25.53(c)(4)(C)(i) – (vi) are true and correct, subject to the exceptions identified in **Exhibit A** to the Joint Emergency Operations Plan submitted herewith, which are expected to be completed by no later than December 31, 2022.

## Emergency Operating Plan Submittal

Signature:  DS  
48B75E679B62429...

Signatory Name: John B. (Thad) Hill

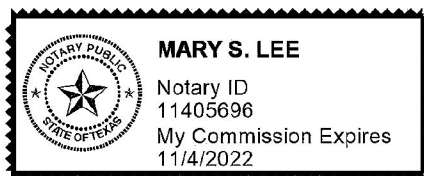
Title: President & CEO

State of Texas

County of Harris

SUBSCRIBED AND SWORN BEFORE ME on this 15<sup>th</sup> day of April 2022.

(seal)



 DS  
2FAD7787555D439...  
\_\_\_\_\_  
Notary Public Signature

**Calpine Corporation**  
**Joint Emergency Operations Plan<sup>1</sup>**

Pursuant to 16 Tex. Admin. Code (“TAC”) § 25.53(d) the following is the Emergency Operations Plan (“EOP”) for Calpine Corporation’s power generation company assets (“PGC”), PGC Registration Number 20008, and retail electric providers (“REPs”), Champion Energy Services, LLC, REP Certificate Number 10098, Calpine Energy Solutions, LLC, REP Certificate Number 10017, and Calpine PowerAmerica, LLC, REP Certificate Number 10015, (together, “Calpine”) for filing with ERCOT. Pursuant to the EOP statute, simultaneously with the filing of the unredacted version of the EOP with ERCOT an Executive Summary and redacted version of the EOP is filed with the PUCT.

**I. EOP Approval and Implementation.**

**a. Introduction of the EOP and its Applicability.**

The purpose of the EOP is to provide a framework concerning how Calpine plans and prepares for, responds to, and recovers from an emergency situation. To support this effort, Calpine has adopted various plans, policies and procedures that collectively comprise the EOP. These policies are a subset of the comprehensive other plans, policies, and procedure that govern Calpine’s operations.<sup>2</sup>

**b. List of Individuals Responsible for Maintaining and Implementing the EOP and those who can change the EOP.**

The individuals responsible for maintaining and implementing the various specific plans, policies, and procedures that collectively amount to Calpine’s EOP and those who can change the EOP include:

<b>Relevant EOP Document</b>	<b>Responsibility Party for Maintaining and Implementing EOP Document<sup>3</sup></b>	<b>Who May Change EOP</b>
Media Response and External Communications Policy (CPN-540)	Brett Kerr, VP-Gov’t Affairs	Brett Kerr
Social Media Policy (CPN-545)	Brett Kerr, VP-Gov’t Affairs	Brett Kerr
Emergency Communications Procedure (ER-CPN-001)	Brett Kerr, VP-Gov’t Affairs	Brett Kerr
PGC Procedure to Maintain Pre-Identified Supplies for Emergencies (ER-CPN-002)	Respective Plant Manager	Respective Plant Manager
REPs Procedure to Maintain Pre-Identified Supplies for Emergencies (CPN-REP-002)	Clint Sandidge, Managing Director	Clint Sandidge
Plant Specific Summer and Winter Readiness Plans and Extreme Weather Checklist (Summer Checklist – ER-CPN-REP-006) <sup>4</sup>	Respective Plant Managers	Respective Plant Managers

<sup>1</sup>Confidential – Information Protected Pursuant to 16 TAC § 22.71(d); 16 TAC § 25.362; ERCOT Protocol 1.3 Tex. Gov. Code § 552.101 (under Texas Homeland Security Act) and § 552.110.

<sup>2</sup> For example, Calpine employs robust environmental, health and safety programs, including an EHS Emergency Response Plan.

<sup>3</sup> Individuals responsible subject to change in the ordinary course of business.

<sup>4</sup> Applicable Calpine reference number varies by facility.

PGC Emergency Staffing Procedure (ER-CPN-003)	Ron Hall, VP-Central Operations	Ron Hall
REPs Emergency Staffing Procedure (CPN-REP-003)	Clint Sandidge, Managing Director	Clint Sandidge
PGC Procedure for Identification of Weather Related Hazards (ER-CPN-004)	Ron Hall, VP-Central Operations	Ron Hall
REPs Procedure for Identification of Weather Related Hazards (CPN-REP-004)	Clint Sandidge, Managing Director	Clint Sandidge
Water Shortage Procedure (ER-CPN-005)	Ron Hall, VP – Central Operations	Ron Hall
Conduct of Operating Standard	Charlie Gates, EVP – Power Ops	Charlie Gates
PGC Pandemic and Epidemic Plan (Rev. 5, January 21, 2021)	Charlie Gates, EVP – Power Ops	Charlie Gates
Corporate/REPs Pandemic and Epidemic Plan (Rev. 1, March 2011)	Hether Benjamin-Brown, CAO	Hether Benjamin-Brown
PGC Plant Specific Hurricane Plans <sup>5</sup>	Respective Plant Managers	Plant Managers
Corporate/REPs Hurricane Plan (CPN-502)	Hether Benjamin-Brown, CAO	Hether Benjamin-Brown
Cyber-Security Incident Response Plan (Rev. 1, March 2015)	Annessa McKenzie, VP - CSO	Annessa McKenzie
Physical Security Incident Response Plan (Rev. 1, Dec. 2020)	Annessa McKenzie, VP – CSO	Annessa McKenzie

**c. Revision Control Summary that List the Dates of each Change Made to the EOP since the initial EOP filing.**

Each specific plan, policy, or procedure which comprises the EOP has a revision control date that lists the date of each change made to the respective plan, policy, or procedure. Those dates are reflected below:

Relevant EOP Document	Version	Effective Date	Description of Change
Media Response and External Communication	2.0	March 7, 2022	
Social Media Policy	1.0	July 25, 2017	
Emergency Communication Procedure	1.0	April 12, 2022	
Extreme Hot Weather Procedure	1.0	April 12, 2022	
<b>Plant Specific Seasonal Readiness Plans:<sup>6</sup></b>			
Baytown	1.0 (Winter)	November 22, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	1.0 (Summer)	April 12, 2022 (Summer)	

<sup>5</sup> Applicable Calpine reference number varies by facility.

<sup>6</sup> Due to the voluminous nature of the revision histories only the last revised version of the applicable documents has been provided and further information is available upon request. Additionally, the summer readiness plans, which have long been used by all PGC facilities, were recently amended and restated in their entirety and the revision number set to Version Number 1.

Bosque	1.0 (Winter)	November 17, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	1.0 (Summer)	April 11, 2022 (Summer)	
Channel	1.0 (Winter)	November 22, 2022 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	1.0 (Summer)	April 12, 2022 (Summer)	
Corpus	7.0 (Winter)	November 23, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	1.0 (Summer)	April 12, 2022 (Summer)	
Deer Park	2021 (Winter)	November 30, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	2021 (Summer)	April 14, 2021 (Summer)	
Freestone	2.0 (Winter)	November 22, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	0 (Summer)	April 13, 2022 (Winter)	
Guadalupe	7.0 (Winter)	November 24, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	1.0 (Summer)	April 12, 2022 (Summer)	
Hidalgo	1.0 (Winter)	November 22, 2021 (Winter)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.

	1.0 (Summer)	April 11, 2022 (Summer)	
Jack A. Fusco	1.0 (Winter)  1.0 (Summer)	November 22, 2021 (Winter)  April 11, 2022 (Summer)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
Magic Valley	27 (Winter)  5.0 (Summer)	November 22, 2021 (Winter)  April 12, 2022 (Summer)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
Pasadena	2021 (Winter)  1.0 (Summer)	November 22, 2021 (Winter)  May 6, 2021 (Summer)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
	Aug. 2021 (Winter)  1.0 (Summer)	August 27, 2021 (Winter)  May 6, 2021 (Summer)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
Texas City	1.0 (Winter)  1.0 (Summer)	November 17, 2021 (Winter)  April 8, 2022 (Summer)	Updated winter plan to reflect changes to 16 Tex. Admin Code Section 25.55(c)(2) and incorporate lessons learned from Winter Storm Uri.
<b>A Plan to Maintain Pre-Identified Supplies for Emergency Response</b>			
PGC Procedure to Maintain Pre-Identified Supplies for Emergencies	1.0	April 12, 2022	Compliments plant specific Seasonal Readiness Plans and site specific Hurricane Plans
REPs Procedure to Maintain Pre-Identified Supplies for Emergencies	1.0	April 12, 2022	
<b>A Plan that Addresses Staffing During Emergencies</b>			

PGC Emergency Staffing Procedure	1.0	April 12, 2022	Compliments plant specific Seasonal Readiness Plans, plant specific Hurricane Plans, PGC Pandemic and Epidemic Plan, and Inclement Weather and Natural Disaster Pay Policy
REPs Emergency Staffing Procedure	1.0	April 12, 2022	Compliments the Inclement Weather and Natural Disaster Pay Policy
<b>Procedures for Identification of Weather Related Hazards</b>			
PGC Procedure for Identification of Weather Related Hazards	1.0	April 12, 2022	Compliments plant specific Seasonal Readiness Plans and site specific Hurricane Plans.
REPs Procedure for Identification of Weather Related Hazards	1.0	April 12, 2022	Compliments the Corporate/REPs Hurricane Plan
Water Shortage Procedure	1.0	April 12, 2022	
Conduct of Standard Operating Procedure	1.0	June 1, 2018	
<b>A Pandemic and Epidemic Annex</b>			
PGC Pandemic and Epidemic Plan	5.0	January 22, 2022	Updated to reflect additional agency guidance
	4.0	August 28, 2020	Updated to reflect additional agency guidance
	3.0	June 5, 2020	Updated to reflect additional agency guidance
	2.0	April 16, 2020	Updated to reflect additional agency guidance
	1.0	March 26, 2020	
Corporate/REPs PGC Pandemic and Epidemic Plan	1.4	February 8, 2018	Updated MIR3 contacts, approvals, ownership
	1.3	September 17, 2014	Name changes, passcodes, links, change from HR Director to HR, removed EBCMT
	1.2	September 3, 2013	Owner name, conference phone number, activation of links
	1.1	September 28, 2012	Changed RF to DH
	1.0	March 1, 2011	
<b>A Hurricane Plan<sup>7</sup></b>			
Plant Specific Hurricane Plans			
Baytown	10.0	May 10, 2019	
Channel	3.0	August 26, 2021	
Corpus	1.0	April 15, 2022	Review and Revision
Deer Park	20.0	March 21, 2022	Annual Revision

<sup>7</sup> Due to the voluminous nature of the revision histories only the last revised version of the applicable documents has been provided and further information is available upon request. Additionally, those facilities not located within a Hurricane Zone do not have hurricane plans.

Hidalgo	3.0	-	
Jack A. Fusco	1.0	June 10, 2021	
Magic Valley	2.0	November 29, 2016	
Pasadena	3.0	May 7, 2021	
Texas City	7.0	April 11, 2022	
Corporate/REPs Hurricane Plan	1.5	January 2015	Replaced RF with HH
	1.4	June 2014	Removed DH's name, replaced DF with HBB
	1.3	April 23, 2014	Removed AM's name, included definitions of the four Wave Responder levels
	1.2	September 2013	Incorporated KPMG edits, other minor updates, and bridge call numbers
	1.1	May 2013	Annual update: minor clean-up edits, timeline updated
	Draft	May 2012	Broadened scope, changed criteria
	.04	June 27, 2011	
Cyber-Security Incident Response Plan	1.7	December 18, 2020	Updated to include definition of "Attempt" and approach to CIP 008-6 Reporting Compliance
	1.6	January 9, 2020	Combined Appendix D and Appendix E as both are DSA requirements. Changed CUI to CCUI. Appendix E is now ISO Regulatory Notice of Cybersecurity Incident
	1.5	May 24, 2019	Appendix D & E were added to clarify processes and contact information needed to satisfy the DSA in case of a DSI.
	1.4	November 14, 2018	Removed cyber defense section and made other changes
	1.3	May 16, 2016	Removal of team members.
	1.2		Updated the phases of incident response & placed Cyber Defense in Appendix A
	1.1		Changed ES-ISAC Reporting Email on page #27.
	1.0	January 28, 2016	Added Adjusted NERC CIP reference; Removed in-line comments, added Future Work section; Changed order of sections for clarity; Added info from NERC EOP- 004 to provide clarity on what is a reportable incident
Physical Security Incident Response Plan	1.0	January 1, 2021	

Calpine ensure that its employees have access to and are trained on the various policies, plans and procedures which comprise the EOP and those records are found in **Exhibit A** and in accordance with Tex. Adm. Code § 25.53(c)(4)(C) an attestation from the highest ranking representative with binding authority over the PGC and REPs is attached as **Exhibit B**. Calpine last filed a comprehensive summary of its EOP in PUC Docket No. 37276 on October 28, 2021 and a comprehensive EOP with ERCOT on March 2, 2012. This version of the EOP was approved by Calpine management on April 14, 2022 and as of April 14, 2022, supersedes any previously filed version of Calpine's EOP with the PUCT or ERCOT.

**II. A Communication Plan.** In accordance with Section 25.53(d)(2)(B)-(C), the PGC and REPs have an Emergency Communications Procedure, copy attached as part of **Exhibit C** which describes the procedures used to communicate with all external audiences regarding emergencies and other incidents involving Calpine, including communicating with the media, the commission, OPUC, fuel suppliers, local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity, and ERCOT and responding to customer complaints during emergencies. This procedure is in addition to Calpine's various other communications policies, including the Media Response and External Communication Policy and the Social Media Policy, a copy of both attached as part **Exhibit C** which govern various aspects of Calpine's external communications. In short, before, during and after an emergency situation the PGC and REPs will provide a variety of information to their respective external stakeholders through a diverse set of processes which vary from pre-event alert notifications, to real-time updates, to post-event updates on emergency response efforts. Calpine's overarching communication objective during an emergency is that there is a single, unified and accurate message from all company sources which accurately portrays the state of the emergency, Calpine's emergency response efforts, and associated recovery expectations to each external stakeholder group. Calpine accomplishes this through communication to the public, media, and customers via Calpine's website, Twitter and Facebook pages, graphically displaying an outage map on the REPs website, increasing call center staffing during emergencies, escalating customer complaints during emergencies and logging them for post-event evaluation and lessons learned, staying in contact with fuel suppliers prior to and during an emergency event to ensure continuous communications regarding fuel supply, and keeping ERCOT, the PUCT, and OPUC apprised of any interruption involving a Calpine facility by providing real-time updates in accordance with ERCOT protocols. The Emergency Communications Procedure, Media Response and External Communication Policy and Social Media Policy are attached as **Exhibit C** and are hereby incorporated into this EOP by reference.

The EOP's Emergency Communication Procedure, Media Response and External Communication Policy and Social Media Policy apply to the PGC and the REPs.

**III. Plan to Maintain Pre-Identified Supplies for Emergencies.** In accordance with Section 25.53(d)(3), Calpine has established a PGC Procedure to Maintain Pre-Identified Supplies for Emergencies, a copy attached in **Exhibit D** which supplements the Seasonal Readiness Plans (attached in **Exhibit J** as **Annex 1**) and site specific Hurricane Plans (attached in **Exhibit J** as part of **Annex 5**). Under both plans and the procedure, Calpine reviews contingency work packages to ensure packages are complete and parts are available if any operational issues should arise due to an emergency. Also, pursuant to all three of these documents, each Calpine facility has a pre-identified emergency supply inventory list that is monitored, reviewed, and updated as needed.

Similarly, the REPs have a REPs Procedure to Maintain Pre-Identified Supplies for Emergencies, a copy attached in **Exhibit E** which describes their procedure associated with maintaining pre-identified emergency supply inventory lists that are monitored, reviewed, and updated as needed.

The PGC Procedure to Maintain Pre-Identified Supplies for Emergencies, attached as **Exhibit D** and the REPs Procedure to Maintain Pre-Identified Supplies for Emergencies, attached as **Exhibit E** are hereby incorporated into this EOP by reference.

The PGC Procedure to Maintain Pre-Identified Supplies for Emergencies, Seasonal Readiness Plans and the plant specific Hurricane Plans apply to the PGC and the REPs Procedure to Maintain Pre-Identified Supplies for Emergencies applies to the REPs.

**IV. Emergency Staffing Plan.** In accordance with Section 25.53(d)(4), for the PGC during and after an emergency, the PGC Emergency Staffing Procedure, attached as **Exhibit F** provides the procedures for addressing staffing during an emergency. The procedure compliments the staffing requirements found in the plant specific Seasonal Readiness Plans (attached in **Exhibit J** as **Annex 1**), plant specific Hurricane Plans (attached in **Exhibit J** as part of **Annex 5**), PGC Pandemic and Epidemic Plan (attached in **Exhibit J** as part of the **Annex 4**) and Inclement Weather and Natural Disaster Pay Policy. Under all of these plans and the procedure, Calpine maintains proper staffing to ensure safe and efficient emergency response which helps to facilitate continuous operations before, during, and after an emergency event.

Similarly, for the REPs, the REPs Emergency Staffing Procedure (attached in **Exhibit G**) specifies how the REPs staff their organizations during emergencies and is supplemented by the Inclement Weather and Natural Disaster Pay Policy.

The PGC Emergency Staffing Procedure, attached as **Exhibit F** and the REPs Emergency Staffing Procedure, attached as **Exhibit G** are hereby incorporated into this EOP by reference.

The PGC Emergency Staffing Procedure, plant specific Seasonal Readiness Plans, plant specific Hurricane Plans, and PGC Pandemic and Epidemic Plan apply to the PGC, the REP Emergency Staffing Procedure applies to the REPs, and the Inclement Weather and Natural Disaster Pay Policy applies to the PGC and the REPs.

**V. Identification of Weather Related Hazards Plan.** In accordance with Section 25.53(d)(5), the PGC Procedure for the Identification of Weather Related Hazards, attached in **Exhibit H** and REPs Procedure for the Identification of Weather Related Hazards, attached in **Exhibit I** detail how the PGC and REPs identify potentially several weather events, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, droughts, and flooding. These procedures are supplemented by the PGC's Seasonal Readiness Plans, the PGC Hurricane Plans, and the corporate/REPs Hurricane Plans.

In addition, to those procedures Calpine employs a meteorologist and uses state of the art weather applications to monitor and forecast current and future weather patterns. Further, for the PGC the plant specific Seasonal Readiness Plans and the both entities' Hurricane Plans, establish that Calpine's meteorologist will provide updates and alerts to specific teams of any extreme cold, extreme hot or hurricane related issues via email during the winter, summer and hurricane seasons. Those plans also establish a process for creating a situational assessment. Moreover, Calpine staff members monitor the weather 24 hours, seven (7) days a week. Hourly, daily, weekly, and monthly forecasts and weather behavioral trends are some of the parameters used to monitor the weather conditions.

The PGC Procedure for the Identification of Weather Related Hazards, attached as **Exhibit H** the REPs Emergency Staffing Procedure, attached as **Exhibit I** are hereby incorporated into this EOP by reference.

The PGC Procedure for the Identification of Weather Related Hazards, the PGC plant specific Hurricane Plans, and the plant specific Seasonal Readiness Plans apply to the PGC. The REPs Procedure for the Identification of Weather Related Hazards and Corporate/REPs Hurricane Plan apply to the REPs.

a. **Tornadoes.**

Under the PGC Procedure for the Identification of Weather Related Hazards, the on-shift control room operator monitors weather conditions and notifies the plant manager when a tornado watch or tornado warning has been issued in the area by the National Weather Center. When a tornado threat is imminent (tornado warning has been issued in the immediate area), employees and contractors are notified to assemble within the designated safe assembly area (as defined in the PGC Procedure for the Identification of Weather Related Hazards) until the all clear has been given. The plant manager or his designee shall determine when the threat has passed and sounds the all clear. After the all clear has been sounded the plant manager or his designee shall obtain an accurate head count of personnel, assess if any personnel have received injuries that require first aid or medical treatment, and begin efforts to inspect the facility for damages.

Under the REPs Procedure for the Identification of Weather Related Hazards, Calpine's On-Shift Operations Lead monitors conditions for tornado warnings at the corporate headquarters and REP locations and notifies the senior management team if any actions need to be taken in response to such warning.

b. **Hurricanes.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards, hurricane response is addressed in the PGC and REPs Hurricane Plans (attached in **Exhibit J** as part of **Annex 5**) which is discussed in detail as part of those plans.

c. **Extreme Cold Weather/Extreme Hot Weather.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards, Calpine's meteorologist is tasked with monitoring daily reports by the National Weather Service for extreme cold or extreme hot weather conditions which could impact plant operations or the REPs. If such condition is identified, each respective plan, along with other applicable Calpine plans, provides direction to the PGC or REPs of the actions each entity needs to take to mitigate the impacts of extreme cold or extreme hot weather conditions.

d. **Drought.**

Water is a vital component of the PGC's operations. Under the PGC Procedure for the Identification of Weather Related Hazard Plan, each Calpine facility closely monitors precipitation, temperatures, river levels, and other key indicators to determine if drought conditions may impact its operations. If such conditions are projected, the impacted Calpine facility works collaboratively with its water supplier and reviews its Water Shortage Procedure to mitigate the impacts to operation.

e. **Flooding.**

Under the PGC and REPs Procedures for the Identification of Weather Related Hazards, rainfall and river levels are monitored for locations susceptible to flooding.

**VI. Process for Activating EOP (Pages x-xx).**

Calpine's EOP is not in effect at all times and does not govern routine outages or other events that occur day-to-day for the PGC or REP due to equipment damage, minor or localized weather events, or other

causes. Instead, the EOP is triggered where there is or could be an emergency event contemplated by the various plans and procedures which constitute the EOP that may impact or interrupt Calpine operations.

**VII. Applicable Annexes.**

In accordance with Section 25.53(d)(6), 25.53(e)(2)(A)-(H), and 25.53(e)(3)(A)-(E), the following annexes are attached as **Exhibit J** for the PGC the REPs as indicated:

**A. PGC Only**

- A weather emergency annex that includes (**Annex 1**):
  - Operational plan for responding to a cold and hot weather emergency, distinct from the weather preparations required under § 25.55
  - Verification of the adequacy and operability of fuel switching equipment, if installed; and
  - A 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
- A water shortage annex that addresses supply shortages of water used in the generation of electricity (**Annex 2**); and
- A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat (**Annex 3**)

**B. PGC and REPs**

- A pandemic and epidemic annex (**Annex 4**);
- A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM (**Annex 5**);
- A cyber security annex (**Annex 6**); and
- A physical security incident annex (**Annex 7**).

**Exhibit A**

EOP Document	Titles and Names of Persons in the Organization Receiving Access to and Training on the EOP and Dates of Such Access and Training <sup>8</sup>
Media Response and External Communication Policy (CPN-540)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Media Response and External Communication Policy which is posted on Calpine's internal SharePoint site and applicable PGC senior management and Power Plant Managers were last trained on the policy on April 13, 2022.</p> <p>Similarly, the REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Media Response and External Communication Procedure, which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the policy on April 14, 2022.</p> <p>Additional training for any applicable personnel will be completed by December 31, 2022.</p>
Social Media Policy (CPN-545)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Social Media Policy which is posted on Calpine's internal SharePoint site and all applicable PGC employees receive annual training on the policy each October. The PGC's senior management and applicable PGC employees were last trained on the policy in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs' applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Social Media Policy, which is posted on Calpine's internal SharePoint site and all applicable REPs applicable senior management and employees receive annual training on the policy each October. The REPs applicable senior management and applicable REPs employees were last trained on the policy in October 2021. In accordance with the REP's annual training schedule, the REP's applicable senior management and applicable REP power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Emergency Communications Procedure (ER-CPN-001)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Emergency Communications Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable Power Plant Managers were last trained on the procedure on April 13, 2022.</p> <p>Similarly, the REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Emergency Communications Procedure, which is posted on Calpine's internal SharePoint site and the REPs applicable senior management and were last trained on the procedure on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

<sup>8</sup> Due to the voluminous nature of the training records for Calpine's hundreds of employees, as well as privacy concerns associated with providing employee names and identifying information, training information has been provided by employee category and title. Further information is available upon request.

PGC Procedure to Maintain Pre-Identified Supplies for Emergencies (ER-CPN-002)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs, have continuous access to the PGC Procedure to Maintain Pre-Identified Supplies for Emergencies which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan and PGC Pandemic and Epidemic Plan, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Procedure to Maintain Pre-Identified Supplies for Emergencies (CPN-REP-002)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including applicable Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Procedure to Maintain Pre-Identified Supplies for Emergencies, which is posted on Calpine's internal SharePoint site and the REPs senior management was last trained on the procedure, which complements the Corporate/REPs Hurricane Plan on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Plant Specific Seasonal Readiness Plans and Extreme Weather Checklist (Summer Checklist – ER-CPN-006) <sup>9</sup>	<p>All applicable Calpine PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Plant Specific Seasonal Readiness Plans and Extreme Weather Checklist and are trained prior to the start of the winter season (December 1) and summer season (June 1) on their plant's specific seasonal readiness plans and extreme weather checklist. The last winter training occurred prior to December 1, 2021 and the last summer training occurred prior to June 1, 2021. In accordance with the PGC's training schedule, the PGC's applicable senior management and applicable PGC power plant employees will be trained on the winter readiness policy again prior to December 1, 2022 and the summer readiness policy prior to June 1, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
PGC Emergency Staffing Procedure (ER-CPN-003)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Emergency Staffing Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan, PGC Pandemic and Epidemic Plan, and Inclement Weather and Natural Disaster Pay Policy, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Emergency Staffing Procedure (CPN-REP-003)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Emergency Staffing Procedure, which is posted on Calpine's internal SharePoint site and the applicable REPs senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan and the Inclement Weather and Natural Disaster Pay Policy, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

<sup>9</sup> Applicable Calpine reference number varies by facility.

PGC Procedure for Identification of Weather Related Hazards (ER-CPN-004)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Procedure for Identification of Weather Related Hazards which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure, which compliments Calpine's Seasonal Readiness Plans, PGC Hurricane Plan and PGC Pandemic and Epidemic Plan, on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
REPs Procedure for Identification of Weather Related Hazards (CPN-REP-004)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the REPs Procedure for Identification of Weather Related Hazards which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Water Shortage Procedure (ER-CPN-005)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Water Shortage Procedure which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Conduct of Operations Standard	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the Conduct of Operations Standard which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on April 13, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
PGC Pandemic and Epidemic Plan (Rev. 1, March 2020)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including PGC power plant Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs have continuous access to the PGC Pandemic and Epidemic Plan which is posted on Calpine's internal SharePoint site and applicable PGC senior management and applicable power plant Plant Managers were last trained on the procedure on March 7, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Corporate/REP Pandemic and Epidemic Plan (Rev. 1, March 2011)	<p>The REPs' applicable senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Corporate/REPs Pandemic and Epidemic Plan which is posted on Calpine's internal SharePoint site and the REPs applicable senior management were last trained on the procedure, which compliments the Corporate/REPs Hurricane Plan, on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Plant Specific PGC Hurricane Plan <sup>10</sup>	<p>The PGC's applicable employees, including Plant Managers, Operators, Maintenance Techs, and I&amp;CE Techs located at a Calpine power plants which are situated in hurricane evacuation zones, as</p>

<sup>10</sup> Applicable Calpine reference numbers vary by facility.

	<p>defined by the Texas Division of Emergency Management (Baytown Energy Center, Channel Energy Center, Corpus Christi Energy Center, Deer Park Energy Center, Hidalgo Energy Center, Jack A. Fusco Energy Center, Magic Valley Generating Station, Pasadena Power Plant, and Texas Plant) have continuous access to their site's Hurricane Plan. PGC employees at Baytown, Deer Park, Jack A. Fusco, and Pasadena were last trained on their site specific Hurricane Plans prior to June 1, 2021, the start of Hurricane Season. Prior to June 1, 2022, all applicable PGC power plant employees who are employed at a facility which is located within a hurricane zone will receive training on the site's Hurricane Plan.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Corporate/REPs Hurricane Plan (CPN-502)	<p>The REPs senior management (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all active REPs employees, including Customer Care Agents, Billing Analyst and Marketing Associates have continuous access to the Corporate/REPs Hurricane Plan which is posted on Calpine's internal SharePoint site and the REPs' senior management team was trained on the plan on April 14, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Cyber-Security Incident Response Plan (Rev. 1, March 2015)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Cyber-Security Incident Response Plan which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable PGC senior management and applicable PGC employees occurred in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs' applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Cyber-Security Incident Response Policy, which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable REPs senior management and applicable REPs employees occurred in October 2021. In accordance with the REPs' annual training schedule, the REP's applicable senior management and applicable REP's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>
Physical Security Incident Response Plan (Rev. 1, Dec. 2020)	<p>The PGC's applicable senior management (Regional Vice President of Operations and Senior Vice President of Operations) and all applicable PGC power plant employees, including applicable PGC power plant Plant Managers, Operators, Maintenance Techs and I&amp;CE Techs have continuous access to the Physical Security Incident Response Plan which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable PGC senior management and applicable PGC employees occurred in October 2021. In accordance with the PGC's annual training schedule, the PGC's applicable senior management and applicable PGC power plant employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Similarly, the REPs applicable senior management team (Vice President of Pricing and Supply, Vice President of Marketing, and Managing Director) and all applicable REPs employees, including Customer Care Agents, Billing Analyst, and Marketing Associates have continuous access to the Physical Security Incident Response Plan, which is posted on Calpine's internal SharePoint site and receive annual training on the plan each October. The last training for all applicable REPs senior management and applicable REPs employees occurred in October 2021. In accordance with the REPs' annual training schedule, the REP's applicable senior management and applicable REP's employees have not yet been trained for 2022 and will be by December 31, 2022.</p> <p>Additional applicable employees will receive required training by December 31, 2022.</p>

In addition, pursuant to Section 25.55(c)(4)(C), the PGC and REPs ensure the following activities are complete:

Relevant EOP Provision	Activity
25.55(c)(4)(C)(i)	<p>The PGC and REPs applicable relevant operating personnel are familiar with and receive training on the applicable contents and execution of the EOP and those employees are instructed to follow the applicable portions of the EOP except to extent deviations are appropriate as a result of a specific circumstances during the course of any emergency.</p> <p>To the extent any training activities required by the EOP have not been completed on the date of this filing, the PGC and REPs will ensure such training is completed by December 31, 2022. Once those trainings are completed, Calpine will notify the Commission.</p>
25.55(c)(4)(C)(ii)	<p>The PGC and REPs applicable executive for each organization have reviewed and approved the EOP.</p> <p>Additional training and reviews for any applicable personnel will be completed by December 31, 2022.</p>
25.55(c)(4)(C)(iii)	<p>The PGC and REPs also regularly conduct drills regarding various procedures contained in the EOP and both further intend to conduct drills going forward consistent with subsection (f) of the PUC Subst. R. Section 25.53 and will provide notice to the Commission at least 30 days before that drill is conducted. Once such drill is conducted, the PGC and REPs will notify the Commission.</p>
25.55(c)(4)(C)(iv)	<p>The PGC and REPs are evaluating whether the new EOP statute requires them to distribute any additional content of the EOP (or an appropriate summary) to local jurisdictions. If the PGC or REPs determine that the new EOP statute requires additional distribution, it will distribute the EOP (or an appropriate summary) as may be necessary or required.</p>
25.55(c)(4)(C)(v)	<p>The PGC and REPs, through their EOP, maintain a business continuity plan that addresses return to normal operations after disruptions caused by an incident.</p>

25.55(c)(4)(C)(vi)	<p>The PGC and REPs applicable employees who are designated to interact with local, state and federal emergency management officials during emergency events have received the latest IS-100 National Incident Management Training. Applicable PGC and REPs personnel who are designated to interact with local, state and federal emergency management officials during emergency events will receive the latest IS-200, IS-700, and IS-800 National Incident Management System training by December 31, 2022. Once those trainings are completed, Calpine will notify the Commission.</p>
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**Exhibit B**  
**Attestation**

## Emergency Operating Plan Submittal

### Sworn Attestation

**Power Generating Company:** Calpine Corporation (Power Generation Company Certificate No. 20008)

**Generation Resource(s):**

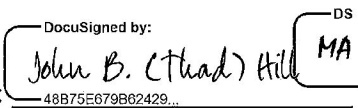
1. Baytown Energy Center: BTE\_BTE\_G1, BTE\_BTE\_G2, BTE\_BTE\_G3, BTE\_BTE\_G4
2. Bosque Energy Center: BOSQUESW\_BSQSU\_1; BOSQUESW\_BSQSU\_2; BOSQUESW\_BSQSU\_3; BOSQUESW\_BSQSU\_4; BOSQUESW\_BSQSU\_5
3. Channel Energy Center: CHE\_CHEST1, CHE\_CHEGT1, CHE\_GT2, CHE\_GT3
4. Corpus Christi Energy Center: CCEC\_GT1, CCEC\_GT2, CCEC\_ST1
5. Deer Park Energy Center: DDPEC\_ST1, DDPEC\_GT1, DDPEC\_GT2, DDPEC\_GT3, DDPEC\_GT4, DDPEC\_GT6
6. Freestone Energy Center: FREC\_GT1, FREC\_GT2, FREC\_ST3, FREC\_GT4, FREC\_GT5, FREC\_ST6
7. Guadalupe Energy Center: GUADG\_GAS1, GUADG\_GAS2, GUADG\_GAS3, GUADG\_GAS4, GAUDG\_STM5, GUADG\_STM6
8. Hidalgo Energy Center: DUKE\_DUKE\_ST1, DUKE\_DUKE\_GT1, DUKE\_DUKE\_GT2
9. Jack A. Fusco Energy Center: BVE\_UNIT1, BVE\_UNIT2, BVE\_UNIT3
10. Magic Valley Generation Station: NEDIN-NEDIN\_G1, NEDIN-NEDIN\_G2, NEDIN-NEDIN\_G3
11. Pasadena Power Plant: CAL\_CALGT1, CAL\_CALSTG1, PSG\_PSG\_GT2, PSG\_PSG\_GT3, PSG\_PSG\_ST2
12. Texas City Energy Center: TXCTY-CTA, TXCTY-CTB, TXCTY-CTC, TXCTY-ST

**Retail Electric Providers:** Calpine PowerAmerica, LLC (REP Certificate Number 10015)  
Champion Energy Services, LLC (REP Certificate Number 10098)  
Calpine Energy Solutions, LLC (REP Certificate Number 10017)

I attest that I am the highest-ranking representative, official, or officer with binding authority over the Power Generation Company (PGC) and Retail Electric Providers (REPs) identified above.

I hereby affirm, based on the best of my information, knowledge and belief that the statements contained in 16 Tex. Admin. Code § 25.53(c)(4)(C)(i) – (vi) are true and correct, subject to the exceptions identified in **Exhibit A** to the Joint Emergency Operations Plan submitted herewith, which are expected to be completed by no later than December 31, 2022.

## Emergency Operating Plan Submittal

Signature:  48B75E679B62429...

Signatory Name: John B. (Thad) Hill

Title: President & CEO

State of Texas

County of Harris

SUBSCRIBED AND SWORN BEFORE ME on this 15<sup>th</sup> day of April 2022.

(seal)



 2FAD7787555D439...  
Notary Public Signature

**Exhibit C**

**Communications Plan**



**Policy Manual**

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POLICY: MEDIA RESPONSE AND EXTERNAL COMMUNICATION

NUMBER: CPN-540

REVISION: 2

GENERAL

  
PRESIDENT & CEO

3/7/22  
DATE

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## **PURPOSE AND SCOPE**

The purpose of this policy is to govern communication with external audiences, including the media, about Calpine. Our goal is to provide timely, accurate information that is consistent with Calpine's mission, values and key messages and in compliance with all laws and regulations governing communications.

## **DEFINITIONS**

**Media:** Any individual or organization seeking information about Calpine for publication or for background use in any media format including, but not limited to, newspapers, television, magazines, film, video, internet, social media, intranet, research work, technical papers or other public forums or publications.

**External audiences:** Any individual, organization or group of people not employed by Calpine or its subsidiaries, including any outside business partners or vendors not subject to nondisclosure agreements covering the information to be shared.

## **REFERENCES**

CPN 132 Insider Trading

CPN 545 Social Media Policy

## **GENERAL INFORMATION**

Members of the media and other external audiences regularly seek a wide range of information about Calpine. This includes information that could affect or influence investment decisions, the company's government and regulatory affairs efforts and perceptions about Calpine by members of key external audiences.

Of particular concern is material, nonpublic information. Federal securities laws require that if such information is released, it must be available to all media and members of the public simultaneously. In general, information is considered material if there is a substantial likelihood that a reasonable investor would consider the information important in making a decision to buy, hold or sell a company's securities. (For more information, see CPN 132-Insider Trading.)

**The manner in which Calpine is portrayed by the media and the information shared with external audiences can positively or negatively**

**affect the company's reputation and its ability to effectively execute its business goals. Calpine's external communications strategy is intended to reinforce and enhance the company's image and brand, create positive awareness and drive increased value to all stakeholders.**

This policy is designed to increase the likelihood that media coverage of Calpine activities is fair and accurate and that members of the media and other external audiences are provided with information that properly reflects Calpine's mission, values and key messages. It is also designed to ensure timely release of previously nonpublic information in a way that is consistent with all applicable laws and regulations.

### **Responsibilities**

It is the responsibility of all Calpine directors, employees, contractors and business partners to comply with this policy.

### **Policy**

Calpine will adhere to the following principles when communicating with the media and external audiences:

- Significant Calpine announcements will be made upon approval of the Chief Legal Officer or their delegate and shall be made available simultaneously to all media and external audiences and posted to the company's internal and external websites, unless otherwise determined by the Chief Legal Officer or their delegate.
- Calpine's Vice President of Governmental and Regulatory Affairs serves as the company's official spokesperson and, unless otherwise directed, will respond to media inquiries and provide information to external audiences on behalf of the company as appropriate in a way that is transparent, factual and timely.
- Calpine will not comment on speculation or rumors.
- All dealings with the media and external audiences will adhere to Calpine's ASPIRE values.

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*Note: Please review Calpine's Social Media Policy (CPN-545) for additional detail on communicating with external audiences via social media.*

## **Media Relations**

The Vice President of Governmental and Regulatory Affairs serves as the official spokesperson for the organization and works closely with Legal and the company's other external-facing departments – including Finance/Treasury, Corporate Communications and Government and Regulatory Affairs – to coordinate timely, accurate responses to media requests.

To ensure that appropriate and consistent information is communicated in accordance with Calpine's vision and values and with all applicable laws and regulations, all interaction with the media shall be coordinated by the Vice President of Governmental and Regulatory Affairs. **No information about the company should be communicated to the media – either on the record or for background – without the prior approval of the Vice President of Governmental and Regulatory Affairs.**

- *Media Requests*

Anyone associated with Calpine who receives a request by the media for an interview, photograph, video footage or other materials or information about the company, must inform the Vice President of Governmental and Regulatory Affairs as soon as possible to receive approval to proceed. If possible, all requests for interaction with the media should be made at least two weeks in advance to allow sufficient time for review.

During the review process, the Vice President of Governmental and Regulatory Affairs will work with executive management, Legal and other affected departments to coordinate an appropriate response to the media inquiry. The Vice President of Governmental and Regulatory Affairs shall also determine what materials or information will be provided to the media in each instance and, if appropriate, who should serve as the company spokesperson.

- *Company Representatives*

As appropriate, the Vice President of Governmental and Regulatory Affairs will work with executive management to identify company leaders or subject matter experts to conduct interviews with the media on the company's behalf. In such cases, the Vice President of Governmental and

Regulatory Affairs will coordinate media interviews, help prepare selected spokespeople and provide or coordinate media training as necessary.

- *Issue/Incident Response*

All Calpine employees are expected to notify the Vice President of Governmental and Regulatory Affairs of any issue or incident within the business that could result in media attention so that the company can develop an appropriate, proactive media response plan.

### **Press Releases**

The Vice President of Governmental and Regulatory Affairs shall work with Corporate Communications on all press release development and distribution for Calpine and its subsidiaries. Together, they will coordinate with the appropriate departments, members of Calpine's senior executive team, Legal and with business partners, as needed, to gather input and approval for external announcements by Calpine or any of its subsidiaries.

Corporate Communications distributes all press releases to the appropriate media outlets, posts them to Calpine's external website and employee intranet, and maintains final copies for archival purposes.

### **Public Presentations and Events**

When a Calpine employee or department participates in a formal presentation or speaking engagement with an external organization (i.e., industry conferences, educational institutions, government forums, etc.) where company information will be shared and/or media attention is possible ("Public Presentation"), they must first obtain the approval of their Supervisor. In addition, all employees who plan to speak or present a Public Presentation (with or without written materials) are required to complete the Employee Speaking Engagement Request Form, including submitting written materials, if any, at least two weeks in advance of the event. Corporate Communications will coordinate and obtain reviews and/or approvals from senior executives, VP of Governmental and Regulatory Affairs, and Legal as appropriate as outlined in the Employee Speaking Engagement Request Form. Note: SVPs and above are not required to complete the Employee Speaking Engagement Request Form; however, they must still notify their Supervisor, Legal and Corporate Communications of their intent to speak publicly.

on behalf of Calpine and are encouraged to seek support/guidance as they prepare for their event.

The Vice President of Governmental and Regulatory Affairs shall coordinate the development, approval and issuance of appropriate communications materials such as news releases, media statements and press kits. They will also conduct or facilitate interviews and/or briefings as needed and forward all final Public Presentations to Corporate Communications for tracking and archival.

Presenters who are approached at events by reporters seeking additional information or interviews may respond to questions pertaining directly to the subject matter they presented. If reporters ask questions about unrelated topics, direct them to the Vice President of Governmental and Regulatory Affairs.

### **Public Websites**

In coordination with Finance/Treasury and Information Technology Services, Corporate Communications coordinates and manages content posted on public-facing websites, Calpine.com and Geysers.com. Any requests for content additions, deletions or revisions to website content shall be directed to Corporate Communications.

For Calpine Retail Operations, each subsidiary's highest-ranking marketing executive is responsible for oversight of website content and ensuring that it is in compliance with this policy. Such communications, however, shall be restricted to marketing efforts of the retail business and shall not address parent matters or public policy affecting the Company's businesses.

### **Use of Calpine Brands and Images**

Corporate Communications maintains brand standards and imagery for Calpine and its subsidiaries.

- **Logos & Imagery**

The names and logos of Calpine Corporation and its subsidiaries, as well as identifiable photos and videos of locations owned and operated by Calpine, may not be used in advertisements, articles, presentations, websites or other marketing material by any outside entity without the express written consent of the Chief Legal Officer or his designee and Corporate Communications. To request consent, contact Corporate Communications who will then work with Legal to coordinate required usage agreements.

- *Advertisements & Other Marketing Collateral*  
Corporate Communications must review and approve any advertisements or marketing materials promoting the Calpine parent company. For Calpine's Retail Operations, all advertising and marketing materials shall be approved by each subsidiary's highest-ranking marketing executive with a copy sent to Corporate Communications.

### **Records**

None

### **Support Documents**

Employee Speaking Engagement Request Form

## Policy Manual

POLICY: Social Media Policy

NUMBER: CPN-545

REVISION: 1

GENERAL



PRESIDENT & CEO

7/25/17

DATE

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**Purpose and Scope**

The purpose of this policy is to govern communication about Calpine Corporation, its subsidiaries and its holdings to external audiences in the realm of social media, as well as provide guidance to employees on the acceptable business-related use of social media. This policy does not apply to use of social media that is strictly personal and not on behalf of Calpine Corporation and its business or charitable efforts.

**Definitions**

**Social Media** – Venues for electronic communication (such as websites and applications used for social networking and microblogging) through which users create online communities to share information, ideas, personal messages and other content such as videos and photos. Examples used for communication to external audiences include but are not limited to Facebook, Twitter, Instagram, Snapchat, LinkedIn, YouTube, Flickr, Glassdoor, Wikipedia, message boards, and similar sites and tools. **Personal Information** – Any private information that might be used to identify a Calpine employee, contractor or vendor, including but not limited to address, telephone number, Social Security Number or company e-mail address.

**General Information**

The proliferation of available social media venues enables and empowers individuals to publicly post information, images, videos and other content. The manner in which Calpine is portrayed via social media can positively or negatively affect the company's reputation and its ability to effectively execute on its business goals.

The potential for unauthorized disclosure of information about the company and its business to external audiences poses risks in terms of regulatory compliance, reputation management and physical security and cybersecurity in addition to investor, community and media relations. Of particular concern is the sharing of material, nonpublic or confidential company information. Federal securities laws require that if such information is released, it shall be available to all media and members of the public simultaneously. In general, information is considered material if there is a substantial likelihood that a reasonable investor would consider the information important in making a decision to buy, hold or sell a company's securities. (For more information, see CPN-132 Insider Trading.)

Calpine's Social Media policy is intended to provide guidance to employees on appropriate use of social media and to mitigate the risk of unauthorized release of information about the company. For questions about use of social media, please contact the Corporate Communications Department.

## **References**

CPN 540 (Media Response and External Communication Policy)

CPN 132 (Insider Trading Policy)

CPN 532 (Information Technology Policy) and related Standards

CPN 104 (Anti-Harassment Policy)

CPN 714 (Records Management Policy)

Calpine Code of Conduct

Outside Employment and Self-Employment Policy

Risk Procedures, Section 4.4

## **Responsibilities**

All Calpine directors, employees, contractors and business partners shall comply with this policy when utilizing social media to communicate with external audiences for business purposes relating to Calpine.

## **Policy**

### Communicating on Behalf of Calpine

Only Calpine representatives designated by the Chief Legal Officer shall communicate or supervise communication with external audiences via social media on behalf of the parent company. For Calpine Retail Operations, all social media communication to external audiences shall be authorized by the retail subsidiary's highest-ranking marketing executive prior to being transmitted and shall be in compliance with this Policy.

No other Calpine directors, employees, contractors or business partners shall create the false impression that they are communicating on behalf of or as a representative of the company on social media sites. Use of the following for personal business is prohibited without prior authorization:

- Logos representing Calpine or its subsidiaries
- Company-owned documents, presentations, photos, videos and other materials

## SOCIAL MEDIA POLICY

POLICY NUMBER: CPN-545

REVISION: 1

- Photos taken or videos recorded of Calpine locations or its subsidiaries' locations

### Responsible Use of Social Media

Employees should exercise personal responsibility, self-discipline and sound judgment when communicating on social media relating to Calpine business or charitable efforts, keeping in mind that the information shared in these venues is public and accessible by co-workers, supervisors, customers, business partners, shareholders and other important stakeholders, including regulators. In addition, individuals may be held legally liable for posting comments, images or other content that another individual or organization considers defamatory, libelous, proprietary, harassing or that could create a hostile work environment. Under no circumstance does Calpine approve or condone social media postings that are defamatory or libelous, violate contract terms, reveal proprietary or confidential information, are harassing or that create a hostile work environment.

Employees shall not share Personal Information about other employees, contractors, vendors or business partners via social media without the subject's permission.

Employees shall not disclose material nonpublic information as described in CPN-132 (Insider Trading Policy) or that is prohibited by the terms of any agreements.

Employees shall not comment on social media about confidential or proprietary company business, including but not limited to legal matters or confidential business plans or efforts.

Employees should exercise prudence and caution if they choose to mention Calpine, its products, its employees, its business partners, its customers or its competitors in any online public forum including but not limited to social media, blogs and websites. In such cases, employees should identify themselves as Calpine employees and explicitly state that the views expressed are theirs alone and do not represent the view of the company.

Employees should use caution when using certain mobile device features on Calpine premises. For example, some location-based social media applications (such as Foursquare and Facebook's "Places") may automatically share the user's location information. Location and time stamps may also be imbedded in photos and videos shot with smartphones. Therefore, employees should familiarize themselves with their mobile devices' features and applications so that location services can be disabled or applications turned off as necessary while on Calpine premises to prevent potential physical security risks.

Employees shall adhere to all Company policies when posting information or materials to social media websites on behalf of Calpine or relating to Calpine business or charitable efforts, including but not limited to the Code of Conduct, CPN-104 (Anti-Harassment Policy), the CPN 532 (Information Technology Policy) and related Standards, and CPN 540 (Media Response Policy).

## SOCIAL MEDIA POLICY

POLICY NUMBER: CPN-545

REVISION: 1

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### Communication Using Calpine Resources

Employees and contractors shall not use Calpine-owned computers or systems for excessive personal use of social media, regardless of the subjects of their posts. In addition, employees and contractors shall not utilize Calpine resources or systems to promote any outside employment or non-Calpine business (see Outside Employment and Self-Employment Policy). Employees and contractors shall have no expectation of privacy when using the company's electronic resources and should be mindful that all communications made on a Calpine IT asset or over a Calpine wired or wireless network are subject to appropriate review and/or monitoring as required (see Acceptable Use Standard as referenced in CPN-532 Information Technology Policy).

Social media venues shall not be used to communicate about Calpine business with outside business partners or vendors. Formal communications with customers and business partners will be monitored and captured as part of regular business records (see CPN-714 Records Management Policy), and these means of communication do not always support creation of such records.

In the event an employee becomes aware of a negative or harmful posting about Calpine or its business, employees should contact the Corporate Communications Department as soon as practical.

### **Records**

None

### **Support Documents**

None





Title:	EMERGENCY COMMUNICATIONS PROCEDURE
Document No:	ER-CPN-001
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to govern communication with before during, an after an Emergency event with the following primary stakeholder groups:

- Media;
- Public;
- Customers;
- Public Utility Commission of Texas
- Office of Public Utility Counsel
- Fuel Suppliers
- Local and State Governmental Entities, Officials and Emergency Operations Centers;
- ERCOT; and
- Procedures for handling customer complaints during an emergency

This procedure supplements the Media Response and External Communications Policy (CPN-540), Social Media Policy (CPN-545), and in the event of a conflict, such policies control.

## DEFINITIONS

**Emergency:** A situation in which known, potential consequences of a hazard or threat are sufficiently imminent and severe that Calpine should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat 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 this is applicable to the entity.

**External Stakeholders:** For purposes of this Procedure, means the Media, the Public, Customers, Public Utility Commission of Texas, Office of Public Utility Counsel, Fuel Suppliers, Local and State Governmental Entities, Officials and Emergency Operations Centers; ERCOT, and procedures for handling customer complaints during an Emergency.

**Power Generating Company (PGC):** An entity that generates electricity intended to be sold at wholesale and does not own transmission or distribution facility in Texas.

**Retail Entity Provider (REP):** An entity that sells electric energy to retail customers in the areas of Texas where the sale of electricity is open to retail competition.

## GENERAL INFORMATION

Calpine's overarching communication objective during an emergency is that there is a single,

Title:	EMERGENCY COMMUNICATIONS PROCEDURE
Document No:	ER-CPN-001
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unified message from all company sources (i.e. the Power Generation Desk, Retail Entity Providers, and Trading Desk) which accurately portrays the state of the Emergency, Calpine's Emergency response efforts, and associated expectations following an Emergency.

## RESPONSIBILITIES

With the approval of senior management, the Emergency Communications Procedure will be activated in advance of, during, and following any Emergency, and develops and provides accurate, consistent, timely, and complete information regarding the status of the applicable emergency event.

Calpine's Vice President of Governmental and Regulatory Affairs collects and disseminates all Emergency information to external stakeholders. The Vice President of Governmental and Regulatory Affairs and Chief Legal Officer also coordinate directly with the PGC and REP organizations to ensure consistency and accuracy of messaging for all applicable emergency events.

## REFERENCES

CPN-540-Media Response and External Communications Policy

CPN-545-Social Media Policy

## PROCESS AND PROCEDURES

In advance of, during, and following, an Emergency event, Calpine provides a variety of information to its External Stakeholders through a diverse set of processes. The methodology utilized varies from pre-event alert notifications, to real time updates, to post-event updates on Emergency response efforts. More specifically,

- **Media.** In accordance with the Calpine's Media Response and External Communication Policy, Calpine provides information to the media for dissemination to the general public regarding pre-event Emergency preparedness, real time Emergency event updates, and post-event Emergency response efforts.
- **Public.** In accordance with the Media Response and External Communication Policy, during an Emergency situation, where public information about the Emergency is warranted each of Calpine's facility managers and the REPs coordinate with the Vice President of Governmental and Regulatory Affairs and Chief Legal Officer to coordinate statements/information provided to the public. Calpine's website, Twitter, and Facebook pages provide the public with real-time information regarding emergency events. The REPs' website contains an Outage Map which graphically displays power outages using a color-coded map. During an emergency, the plant personnel will not share any information with the public and will direct the caller to the Vice President of Governmental and Regulatory Affairs, in accordance with the Media Response and External Communication Policy.

Title:	EMERGENCY COMMUNICATIONS PROCEDURE
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- **Customers.** During emergency events, the REPs' call centers will attempt to leverage internal and external contingency resources, if needed, to meet customer needs. If inbound call volume exceeds the call center capacity, it will then increase call answering capacity through external services provided by an outside vendor(s). Moreover, pursuant to the Media Response and External Communication Policy and Social Media Policy, Calpine's REPs, in coordination with the Vice President of Governmental and Regulatory Affairs and Chief Legal Officer provide customer updates before, during, and after an Emergency Event on Calpine's Twitter and Facebook pages, as applicable. The call center(s) may also allow call center representatives to continue to work from home during an emergency event, or if necessary, may move such representatives to an alternate work site in accordance with its Business Continuity Plan.
- **Public Utility Commission of Texas (PUCT)/Office of Public Utility Counsel (OPUC") and ERCOT (Applicable Reliability Coordinator).** Calpine's Vice President of Governmental and Regulatory Affairs, Trading Desk, and senior management team should be engaged in formal and informal two-way communication with the PUCT, OPUC and ERCOT, as applicable prior to, during, and after an emergency event.
- **Fuel Suppliers.** Prior to, during, and after an Emergency event, Calpine's Gas Operations team contacts fuel suppliers to ensure continuous fuel supply during an Emergency event.
- **Procedures for handling customer complaints during an emergency**  
**Customers.** Calpine's REPs appreciate the importance of addressing Customer complaints, especially during an emergency event and such complaints are evaluated and escalated up to senior management as required by the particular situation, as applicable. All customer complaints are logged for post-event evaluation and lessons learned.

## RECORDS

None.

## REVISION CONTROL

Revision date	Reviser	Rationale for revision
New Issue	B. Kerr	

**Exhibit D**

**PGC Procedure to Maintain Pre-Identified Supplies for Emergencies**



Title:	PGC Procedure to Maintain Pre-Identified Supplies for Emergencies
Document No:	ER-CPN-002
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to clarify that the pre-identified supplies for Emergency responses for Calpine's Power Generating Company ("PGC") that are required by the plant specific Summer and Winter Readiness Plans, the plant specific Hurricane Plans, and the PGC Pandemic and Epidemic Plan are applicable to other Emergencies such as tornadoes, floods, and droughts. As required by those plans, the pre-identified supplies are monitored, inventoried, and updated as needed.

This procedure compliments the plant specific Summer and Winter Readiness Plans, the plant specific Hurricane Plans, and the PGC Pandemic and Epidemic Plan, and in the event of a conflict such policies control.

## DEFINITIONS

**Emergency:** A situation in which known, potential consequences of a hazard or threat are sufficiently imminent and severe that Calpine should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat that may result from the hazard of 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 this is applicable to the entity.

**Power Generating Company (PGC):** An entity that generates electricity intended to be sold at wholesale and does not own transmission or distribution facility in Texas.

## REFERENCES

Plant Specific Hurricane Plans

Plant Specific Summer and Winter Readiness Plans

PGC Pandemic and Epidemic Plan

## GENERAL INFORMATION

Pursuant to the plant specific Summer and Winter Readiness Plans, plant Specific Hurricane Plans, and the PGC Pandemic and Epidemic Plan each Calpine plant maintains at all times an inventory of critical parts, components and a pre-identified emergency supply inventory list for the winter (November 1 through March 1), summer (June 1 through September 15) and hurricane season (June 1 through November 30) that is monitored, inventoried and updated as needed by Plant staff.

Title:	PGC Procedure to Maintain Pre-Identified Supplies for Emergencies
Document No:	ER-CPN-002
Effective Date:	April 12, 2022
Region:	ERCOT

The list of pre-identified supplies found in those plans is broad and should be used by the Plant in the event of other emergencies such as tornadoes, floods, and droughts. The inventory of supplies on site by each Plant should be sufficient to address these other Emergencies.

### **RESPONSIBILITIES**

The roles and responsibilities of plant staff associated with this policy are the same as those found in the site specific Summer and Winter Readiness Plans, the site specific Hurricane Plans, and the PGC Pandemic and Epidemic Plan.

### **PROCESS AND PROCEDURES**

The process and procedures of staff and plant management associated with this procedure are the same as that found in the site specific Seasonal Readiness Plans, the site specific Hurricane Plans, and the PGC Pandemic and Epidemic Plan.

### **RECORDS**

None.

### **REVISION CONTROL**

<b>Revision date</b>	<b>Reviser</b>	<b>Rationale for revision</b>
New Issue	R. Hall	

**Exhibit E**

**REPs Procedure to Maintain Pre-Identified Supplies for Emergencies**



Title:	REP Procedure to Maintain Pre-Identified Supplies for Emergencies
Document No:	CPN-REP-002
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to provide a pre-identified Emergency supply list that is monitored, inventoried and updated as needed by the Retail Entity Providers ("REPs")

## DEFINITIONS

**Emergency:** A situation in which known, potential consequences of a hazard or threat are sufficiently imminent and severe that Calpine should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat 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 this is applicable to the entity.

**Retail Entity Provider (REP):** An entity that sells electric energy to retail customers in the areas of Texas where the sale of electricity is open to retail competition.

## REFERENCES

Corporate/REPs Hurricane Plan

Corporate/REPs Pandemic and Epidemic Plan

## GENERAL INFORMATION

Calpine's overarching objective during an Emergency is that there is adequate inventory of supplies so that REP staff can safely and adequately respond to an Emergency situation.

## RESPONSIBILITIES

The REP senior management team is responsible for ensuring that the pre-identified supply list is monitored, inventoried and updated as needed by the REPs.

## PROCESS AND PROCEDURES

Every 4 months and in advance of, and following, an Emergency event, Calpine's REP locations, will inventory, monitor and ensure that the following pre-identified supplies contained on the Pre-Identified Supplies List below are maintained at the REP location:

- a. First aid kit

Title:	REP Procedure for Maintaining Pre-Identified Supplies for Emergencies
Document No:	CPN-REP-002
Effective Date:	April 12, 2022
Region:	ERCOT

- b. Battery-powered or hand crank radio and a NOAA Weather Radio with tone alert;
- c. Extra batteries

In the event of a disaster or disruption to the office facilities, REP will move operations to an alternate work site in accordance with its Business Continuity Plan.

## RECORDS

None.

## REVISION CONTROL

Revision date	Reviser	Rationale for revision
New Issue	C. Sandidge	

**Exhibit F**

**PGC Emergency Staffing Procedure**



Title:	PGC EMERGENCY STAFFING PROCEDURE
Document No:	ER-CPN-003
Effective Date:	April 12, 2022
Region:	Central

## PURPOSE AND SCOPE

The purpose of this procedure is to provide contingency strategies to staff and operate Calpine's Power Generating Company ("PGC") during an Emergency situation. This procedure compliments the plant specific Seasonal Readiness Plans, plant specific Hurricane Plans, the PGC Pandemic and Epidemic Plan and the Inclement Weather and Natural Disaster Pay Policy, and in the event of any conflict such policies control.

## DEFINITIONS

**Emergency:** A situation in which known, potential consequences of a hazard or threat are sufficiently imminent and severe that Calpine should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat that may result from the hazard of 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 this is applicable to the entity.

**Power Generating Company (PGC):** An entity that generates electricity intended to be sold at wholesale and does not own transmission or distribution facility in Texas.

## REFERENCES

- Plant Specific Hurricane Plans
- Plant Specific Seasonal Readiness Plans
- PGC Pandemic and Epidemic Plan
- CPN-208 (Inclement Weather and Natural Disaster Pay Policy)
- Plant Specific Emergency Operation Procedures

## GENERAL INFORMATION

### **Calpine Corporation PGC On-Site Staff.**

On-shift personnel provide initial staffing for an Emergency at each facility. Each facility's Operators are in charge of Plant operations during their shift and if there is an Emergency at the plant, they follow the appropriate Emergency Operation Procedure.

### **Coordination with Outside Parties.**

Title:	PGC EMERGENCY STAFFING PROCEDURE
Document No:	ER-CPN-003
Effective Date:	April 12, 2022
Region:	Central

In the event of a major Emergency that cannot be managed by on-site personnel, outside emergency personnel must be contacted by dialing 911 from any facility phone pursuant to the Emergency Operation Procedure.

## **RESPONSIBILITIES**

With the approval of the Regional Vice President, and in coordination with the plant specific Hurricane Plan, Seasonal Readiness Plans, and the PGC Pandemic and Epidemic Plan, this procedure can be activated in advance of, during, and following any Emergency event. In the event that this this document conflicts with the plant's Hurricane Plan, Seasonal Readiness Plans or the PGC Pandemic and Epidemic Plan regarding staffing during hurricane season, extreme winter or summer weather, or a pandemic or epidemic those policies shall govern.

## **PROCESS AND PROCEDURES**

### **No coordination with Outside Agency Required.**

Generally, during an Emergency which does not require Coordination with outside parties:

- The Facility's Plant Manager, with the approval of the Regional Vice President, will assign staffing levels for the respective Facility to ensure adequate staffing is available and provided to safely operate the Facility;
- Each Facility's Plant Manager will be responsible to ensure that all tasks are assigned/reassigned so that all necessary functions are completed to safely and reliably operate the Facility;
- In accordance with Company policies, the Facility may consider the following plans to enhance staffing during an Emergency:
  - Discontinue some day to day activities which are not required for the safe operation of the Facility in order to free up staff for Emergency operation functions;
  - Augment plant staff by hiring contractors from a local vendor;
  - Augment plant staff by bringing in Calpine employees from other facilities;
  - Review and revise scheduled shift times to ensure staffing is provided at all times in the highest efficiency during all times of the Emergency event,

Title:	PGC EMERGENCY STAFFING PROCEDURE
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Region:	Central

including sequestering employees at the Facility as required;

- Calling into duty all staff and cancelling any previously requested time off; and
- Contacting all staff to determine his/her level of interest or willingness to work

### **Coordination with Outside Parties Required.**

Generally, during an Emergency which does require Coordination with Outside Parties:

- The Facility's Plant Manager, with the approval of the Regional Vice President, will assign staffing levels for the respective Facility of personnel trained on the particular Emergency event in accordance with the responding agency's request; and
- To the extent possible, the Plant Manager will staff the Facility in such a manner as to ensure that all tasks are assigned/reassigned so that all necessary functions are completed to safely and reliably operate the Facility while not interfering with the operations of outside agency personnel's response to the Emergency.

### **RECORDS**

None.

### **REVISION CONTROL**

Revision date	Reviser	Rationale for revision
New Issue	R. Hall	

**Exhibit G**

**REPs Emergency Staffing Procedure**



Title:	REPs' EMERGENCY STAFFING PROCEDURE
Document No:	CPN-REP-003
Effective Date:	April 12, 2022
Region:	Central

## PURPOSE AND SCOPE

The purpose of this procedure is to provide contingency strategies to staff and operate Calpine's Retail Entities Providers ("REPs") during an Emergency situation. This procedure compliments the Corporate/REPs' Hurricane Plan, Corporate/REPs Pandemic and Epidemic Policy and the Inclement Weather and Natural Disaster Pay Policy, and in the event of any conflict such policies control.

## DEFINITIONS

**Emergency:** A situation in which known, potential consequences of a hazard or threat are sufficiently imminent and severe that Calpine should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat that may result from the hazard of 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 this is applicable to the entity.

**Retail Entity Provider (REP):** An entity that sells electric energy to retail customers in the areas of Texas where the sale of electricity is open to retail competition. A REP buys wholesale electricity, delivery service, and related services, prices electricity for customers, and seeks customers to buy electricity at retail.

## GENERAL INFORMATION

### REFERENCES

- REPs' Pandemic and Epidemic Plan
- REPs' Hurricane Plan
- CPN-208 (Inclement Weather and Natural Disaster Pay Policy)

### **Calpine Corporation REP On-Site Staff.**

On-shift personnel provide initial staffing for an Emergency at each REP location. In the event of an Emergency that causes disruption to the REP's office location, REP may relocate operations to an alternate work site in accordance with its Business Continuity Plan.

### **Coordination with Outside Parties.**

In the event of a major Emergency that cannot be managed by on-site personnel, outside emergency personnel must be contacted by dialing 911 from any REPs' location phone pursuant to the Business Continuity Plan. The floor warden has the initial

Title:	REPs' EMERGENCY STAFFING PROCEDURE
Document No:	CPN-REP-003
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responsibility of assessment and mitigation of any Emergency or potential Emergency situation.

## **RESPONSIBILITIES**

With the approval of REP senior management, and in coordination with the Company's Hurricane Policy and the company's Corporate/REPs Hurricane, Pandemic and Epidemic Policy, and Inclement Weather and Natural Disaster Policy, the Emergency Staffing Procedure can be activated in advance of, during, and following any Emergency event. In the event that this document conflicts with the company's Hurricane Policy or the corporate Pandemic and Epidemic Policy regarding staffing during hurricane season or a pandemic or epidemic those policies shall govern.

## **PROCESS AND PROCEDURES**

### **No coordination with Outside Parties Required.**

Generally, during an Emergency which does not require Coordination with outside parties:

- The REPs, with the approval of senior management, will assign staffing levels for the respective REP location to ensure adequate staffing is available;
- REP senior management will be responsible to ensure that all tasks are assigned/reassigned so that all necessary functions are completed;
- In accordance with Company policy, each REP may consider the following plans to enhance staffing during an Emergency:
  - Discontinue some day to day activities to free up staff for Emergency operation functions;
  - Augment REP staff by hiring contractors from a local vendor;
  - Augment REP staff by bringing in Calpine employees from other locations;
  - Review and revise scheduled shift times to ensure staffing is provided at all times in the highest efficiency during all times of the Emergency event, including sequestering employees at the REP location as required;
  - Calling into duty all staff and cancelling any previously requested time off; and
  - Contacting all staff to determine his/her level of interest or willingness to

Title:	REPs' EMERGENCY STAFFING PROCEDURE
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work

- Relocating staff to an alternative location in accordance with its Business Continuity Plan which will allow them to continue to provide customer service

### **Coordination with Outside Parties Required.**

Generally, during an Emergency which does require Coordination with Outside Parties:

- The REPs may relocate staff to an alternative location in accordance with its Business Continuity Plan which will allow to continue to provide customer service while the agency resolves the Emergency condition with the support and coordination with REP senior management

### **RECORDS**

None.

### **REVISION CONTROL**

Revision date	Reviser	Rationale for revision
New Issue	Clint Sandidge	

**Exhibit H**

**PGC Procedure for Identification of Weather Related Hazards**



Title:	PGC Procedure for Identification of Weather Related Hazards & EOP Activation
Document No:	ER-CPN-004
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to set forth Calpine's Power Generation Company's ("PGC") methodology to identify Weather Related Hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding and the process for activating the EOP when such conditions exists. This procedure supplements the Seasonal Readiness Plans and PGC plant specific Hurricane Plans and in the event of conflict those policies control.

## DEFINITIONS

**Weather Related Hazards:** Means tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding which have the potential to impact Calpine operations.

**Power Generating Company:** An entity that generates electricity intended to be sold at wholesale and does not own transmission or distribution facility in Texas.

## REFERENCES

Plant Specific Seasonal Readiness Plans

Plant Specific Hurricane Plan

## GENERAL INFORMATION

Calpine's overarching objective during a Weather Related Hazard is the safety of its employees and the minimization of operational impact.

## RESPONSIBILITIES

Each facility's Plant Manager, Control Room Operator, operational senior management, and Calpine's Meteorologist are responsible for ensuring that weather related hazards are properly identified and the EOP is activated in accordance with Calpine policy and procedure.

## PROCESS AND PROCEDURES

The process and procedure to identify Weather Related Hazards and to activate the EOP is as follows:

Title:	PGC Procedure for Identification of Weather Related Hazards & EOP Activation
Document No:	ER-CPN-004
Effective Date:	April 12, 2022
Region:	ERCOT

## **Tornadoes:**

### **Identification.**

The on-shift Control Room Operator will monitor the conditions and notify the Plant Manager when a Tornado Watch or Tornado Warning has been issued for the area. If time permits, preparations should be made to bring indoors or secure small and/or loose materials and equipment that could become airborne. A tornado **watch** is issued when weather conditions are favorable for the development of tornados in and close to the watch area. A tornado **warning** is issued to warn an area that a tornado may be imminent. A watch can be issued after either a tornado or funnel cloud has already been spotted, or if there are radar indications that a tornado may be possible.

### **Activation**

When a tornado threat is imminent the plan is activated by the Plant Manager (**tornado warning has been issued in the immediate area**), and employees and other on-site persons should assemble in the designated safe assembly<sup>1</sup> area until the plant all clear has been given. The Plant Manager or his designee shall determine when the threat has passed and sound the all clear. After the all clear has been sounded, the Plant Manager or his designee shall obtain an accurate head count of personnel, assess if any personnel received injuries that require first aid or medical treatment, and begin efforts to inspect the facility for damage.

## **Hurricanes**

### **Identification**

In accordance with the plant specific Hurricane Plans, Calpine's Meteorologist provides updates and alerts to specific teams of any hurricane related issues identified by the National Weather Services via email and conference calls during the Hurricane Season, defined as June 1st to November 30th. The Hurricane Plan also establishes a process for creating general situational assessment as well as a plan for evacuation.

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<sup>1</sup>Designated safe assembly areas include pre-designated shelters such as a safe room, basement, or the lowest building level. If there is no basement, go to an interior room on the lowest level away from corners, windows, exterior doors, and exterior walls (rooms with CMU [concrete masonry unit] walls are best). Put as many walls as possible between you and the outside.

Title:	PGC Procedure for Identification of Weather Related Hazards & EOP Activation
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### Activation

In accordance with the site specific Hurricane Plans, when a Tropical Storm or Hurricane enters the Gulf of Mexico and is predicted to impact a Calpine power plant.

### **Extreme Cold Weather/Extreme Hot Weather**

#### Identification

In accordance with the site specific Seasonal Readiness Plans, when extreme cold or hot weather threats is predicted, Calpine's Meteorologist monitors the weather continuously with state of the art equipment and provides updates and alerts via email and/or conference calls to the potentially impacted facilities who also monitor local news channels and the National Weather Service (NWS) for critical information.

#### Activation

In accordance with the site specific Seasonal Readiness Plans, each Calpine facility activates its Winter or Summer Extreme Weather Plan when outside temperatures are expected to drop or rise to the temperature specified in the applicable Plan.

### **Drought**

#### Identification

Each Calpine facility, Calpine's Meteorologist, and senior operational management should closely monitor precipitation, temperature trends, river levels, NOAA reports and other key indicators to determine if drought conditions may impact Calpine operations.

#### Activation

Upon receiving any notification of drought condition from river masters, water suppliers or the presence of multiple indicators that a drought may be on the horizon, Calpine works collaboratively with the local river masters or supplier and reviews its Water Shortage Plan to mitigate the impacts to operation.

### **Flooding**

#### Identification

In accordance with the site specific Hurricane Plans, each Calpine facility, Calpine's Meteorologist, and senior operational management should closely monitor precipitation, river levels and other key indicators to determine if flooding conditions may impact Calpine operations.

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#### Activation

Upon receiving any notification of potential flooding conditions, the Regional Vice President can activate the EOP, which could include sequestration or evacuation per the plant specific Hurricane Plan.

#### **RECORDS**

None.

#### **REVISION CONTROL**

Revision date	Reviser	Rationale for revision
New Issue	R. Hall	

**Exhibit I**

**REPs Procedure for Identification of Weather Related Hazards**



Title:	REPs Procedure for Identification of Weather Related Hazards & EOP Activation
Document No:	CPN-REP-004
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to set forth Calpine's Retail Entity Providers' ("REPs") methodology to identify Weather Related Hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding and the process for activating the Emergency Operation Plan ("EOP") when such conditions exists. This procedure supplements the Corporate/REPs Hurricane Plans and in the event of a conflict those policies control.

## DEFINITIONS

**Weather Related Hazards:** Means tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding which have the potential to impact Calpine operations.

**Retail Entity Provider (REPs):** An entity that sells electric energy to retail customers in the areas of Texas where the sale of electricity is open to retail competition.

## GENERAL INFORMATION

Calpine's overarching objective during a Weather Related Hazard is the safety of its employees and the minimization of operational impact.

## REFERENCES

Corporate/REPs Hurricane Plans

## RESPONSIBILITIES

The REP senior management and Calpine's Meteorologist are responsible for ensuring that weather related hazards are properly identified and the EOP is activated in accordance with Calpine policy and procedure.

## PROCESS AND PROCEDURES

The process and procedure to identify Weather Related Hazards and to activate the EOP is as follows:

### Tornadoes:

#### Identification.

The REPs on-shift Operations Lead will monitor the conditions and notify REP senior management when a Tornado Watch or Tornado Warning has been issued for the areas

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where the REPs are located. A tornado **watch** is issued when weather conditions are favorable for the development of tornados in and close to the watch area. A tornado **warning** is issued to warn an area that a tornado may be imminent. A watch can be issued after either a tornado or funnel cloud has already been spotted, or if there are radar indications that a tornado may be possible.

#### Activation

When a tornado threat is imminent the plan is activated by the REPs senior management or their designee (**tornado warning has been issued in the immediate area**), and employees and other on-site persons should assemble in the designated safe assembly area<sup>1</sup> until the all clear has been given. The REPs senior management or designee shall determine when the threat has passed and sound the all clear. After the all clear has been sounded the REPs senior management or their designee shall obtain an accurate head count of personnel and assess if any personnel received injuries that require first aid or medical treatment.

### **Hurricanes**

#### Identification

In accordance with the Corporate/REPs Hurricane Plan, Calpine's Meteorologist provides updates and alerts to specific teams of any hurricane related issues identified by the National Weather Services via email and conference calls during the Hurricane Season, defined as June 1st to November 30th. The Hurricane Plan and REP's Business Continuity Plan also establishes a process for creating general situational assessment as well as a plan for evacuation.

#### Activation

When in accordance with the corporate/REPs' Hurricane Plan a Tropical Storm or Hurricane enters the Gulf of Mexico and is predicted to impact a Calpine REP location.

### **Extreme Cold Weather/Extreme Hot Weather**

#### Identification

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<sup>1</sup>Designated safe assembly areas include pre-designated shelters such as a safe room, basement, or the lowest building level. If there is no basement, go to an interior room on the lowest level away from corners, windows, exterior doors, and exterior walls (rooms with CMU [concrete masonry unit] walls are best). Put as many walls as possible between you and the outside.

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When extreme cold or hot weather threats exist, Calpine's Meteorologist monitors the weather continuously with state of the art equipment and provides updates and alerts via email and conference calls to the potentially impacted REPs facility.

#### Activation

The EOP is activated for extreme cold or extreme hot weather by the REPs when there is a Winter Weather or Summer Weather Advisory issued in the REP location.

### **Drought**

#### Identification

Calpine's Meteorologist closely monitors precipitation, temperature trends, river levels, NOAA reports and other key indicators to determine if drought conditions may impact Calpine operations.

#### Activation

Upon receiving any notification of drought condition from water suppliers or the presence of multiple indicators that a drought may be on the horizon, Calpine REPs work collaboratively to ensure that potable water is onsite at the potentially impacted REP location.

### **Flooding**

#### Identification

Calpine's Meteorologist closely monitors precipitation, river levels and other key indicators to determine if flooding conditions may impact Calpine operations.

#### Activation

Upon receiving any notification of potential flooding conditions the REP senior management activates its EOP in coordination with and approval of Calpine executive management.

### **RECORDS**

None.

### **REVISION CONTROL**

Title:	REPs Procedure for Identification of Weather Related Hazards & EOP
Document No:	CPN-REP-004
Effective Date:	April 12, 2022
Region:	ERCOT

Revision date	Reviser	Rationale for revision
New Issue	C. Sandidge	

**Exhibit J**

**Annex 1 – Weather Emergency Annex**



Baytown Energy Center Procedure Manual

DOCUMENT: PLANT SPECIFIC WINTER READINESS PLAN

REVISION: 1

DocuSigned by:  
*Gaines Wright* MA  
58B0C499820548D  
PLANT MANAGER

11-22-2021

DATE

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- Attachment 10: Winter Readiness Actions Timeline
- Attachment 11: Baytown Winter Readiness Certification

## 1.0 PURPOSE

The purpose of this document is to describe the process to be used for preparing the Plant for reliable operations during the Winter Period by ensuring compliance with the Plant Specific Winter Readiness Plan (the "Plan"). The Plan is to be used in conjunction with the Winter Readiness Standard (the "Standard"), Plant Specific Winter Operations Procedure (the "Procedure"), the Winter Readiness Actions Timeline, checklists, worksheets, and Maximo PMs.

## 2.0 SCOPE

For the purpose of this procedure, the Winter Period is from November 1 through March 15. This Plan directs the management of the scope of work activities for staff to complete before cold weather arrives. This Winter Readiness Plan is not the same as the Procedure. The Plan is to provide guidance for *preparing* the plant to endure winter temperatures without unplanned or forced outages or derates. The Plant staff will implement the Procedure only when the ambient temperature is low enough to cause potential problems. The intent of the Plan is to identify reliability issues that are directly related to cold weather, not reliability issues in general.

## 3.0 DEFINITIONS

Critical Equipment: Plant equipment that, during cold weather events, has the potential to: initiate a unit trip, impact unit startup, initiate an automatic runback, adversely affect environmental controls that may cause an outage or derate, adversely affect the delivery of fuel or water supply to the unit, or create a safety hazard.

Winter Period: The period from November 1 through March 15.

## 4.0 RESPONSIBILITIES

### Plant Manager

The Plant Manager is responsible for:

- Developing and revising (based on lessons learned) the Plant's Plan and the Procedure. The Plan and Procedure must address all recommendations in the Standard that are applicable to the Plant.
- Performing or delegating Winter Readiness Coordinator responsibilities.
- Approving Plant Specific Plans and Procedures and ensuring all identified winter readiness work is completed prior to its required winter completion date.
- Ensure all Plant specific planned winter readiness activities and identified preventive maintenance ("PM") and corrective maintenance are entered into Maximo. All winter planned and repair work is to be documented in Maximo using the program category

"Seasonal" and the task category "Winter".

- Routinely updating the RVP on the Plant's winter readiness status.
- Verifying the Plant's winter readiness and formally certifying that readiness to the RVP prior to winter.
- During cold weather operation, ensuring the Plant Procedure is implemented, and any issues identified are corrected in a timely manner to assure continued reliable winter operation.

#### Maintenance Manager

The Maintenance Manager is responsible for:

- Implementing the Plant Plan and revising the Plan as required based on lessons learned.
- Ensuring the Winter Readiness PMs and other activities are in Maximo and implemented in accordance with the timeline included in the Plant's Plan and documented in Maximo (using the category "Seasonal" and the task category "Winter").
- Ensuring initial adequate stock of any consumables and supplies required to be on hand prior to any significant cold weather event (list included in the Plan) and re-ordering such stock of consumables and supplies when appropriate.
- During Winter Period, timely identifying and addressing any equipment deficiencies that could impact reliable operation during cold weather and properly documenting all repairs in Maximo.

#### Operations Manager

The Operations Manager is responsible for:

- Implementing the Plant Procedure and revising the Procedure as advisable based on lessons learned.
- Reviewing the Plant Operations Procedure before each Winter Period (October) to ensure the operating procedures, checklists, and instructions are current and include any new equipment added to the plant configuration since the previous Winter Period. Include in the review, Calpine fleet lesson learned, NERC lessons learned, and general industrial best practices that may have become known since last Winter Period.
- Reviewing the ongoing winter operation activities implemented during cold weather events, including activities identified in the rounds sheets and other checklists, in the Plant Procedure.

- Verifying that the Plant communications system is operational and that backup communications are in place.

#### Winter Readiness Coordinator

A Winter Readiness Coordinator shall be appointed by the Plant Manager. The Winter Readiness Coordinators are responsible for communicating and tracking activities needed to achieve sustained reliability and availability during extreme weather events and for routinely reporting to the Plant Manager the status of the Plant's winter readiness preparations. The Plant Winter Readiness Coordinator supports the Operations and Maintenance Managers as required in performing their responsibilities as outlined above.

Specific responsibilities include:

- Chairing scheduled winter readiness meetings at intervals appropriate to the Plant.
- Tracking and reporting status of the Plant's winter readiness preparations.
- Procuring and positioning winter readiness consumables and supplies required to be on hand prior to any significant cold weather event (list included in the Plant Plan).

## **5.0 THE PLAN**

In accordance with the Standard, the Plant has developed a Plan which includes its performance and documentation of the following activities, whenever applicable:

1. Minimum Plant Design Operating Temperature. The minimum design temperature for Plant operations is [REDACTED]

The Plant reviews any Plant modifications made in the previous year to verify that the modifications have not impacted the minimum plant design operating temperature.

This annual review is scheduled on PM #101602 and the results are documented in the Plant's SharePoint or Maximo.

2. Review of Lessons Learned. The Plant reviews equipment freezing issues experienced over the previous year to determine lessons learned and incorporates lessons learned into the Plant Plan to avoid any reoccurrence.

This review is scheduled in PM #10602 and any identified action items are placed in Maximo work orders and identified with program code "Season" and Task Code "Winter" and reviewed during annual training with Plant staff. Any lessons learned may also be documented in the Plant's SharePoint.

3. Review Critical Equipment List. A list of Plant Critical Equipment that may be impacted by cold weather is attached as Attachment 1 to this Plan (Critical Instrument List).
4. Inspection and Testing of Heat Trace Panels and Heat Tracing for Critical Equipment Instruments. The type of heat tracing used at the Plant is the constant wattage type. Heat tracing is used to protect instruments and other vulnerable equipment from freezing. PM #55296 is in Maximo for monthly testing. Any issues found during these PM checks are documented as follow up work orders in Maximo and identified with program code "Season" and Task Code "Winter." Attached to the Plan is Attachment 2 (Heat Trace List), identifying the circuits, testing method, ambient temperature when tested and testing results.
5. Perform Instrument Air System Maintenance. The Instrument Air System is critical to the operation of the Plant. Instrument Air System components are given high priority when malfunctions occur. To maintain the system integrity, moisture is removed from the system by automatic drain valves.

The designed dewpoint is -40 degrees F and the dewpoint is monitored by Operations personnel and a monthly walk down of the system is performed as part of the Procedure. Additionally, any preventive or corrective maintenance is documented in general Maximo work orders which can be queried using "IAS" system code in Maximo. An annual review of the Instrument Air system maintenance is performed on PM #101602.

6. Review Corrective Maintenance Work Orders. As part of the Winter Period preparation, a review of open Corrective Maintenance Work Orders having program code "Seasonal", and Task Code "Winter" is conducted to determine their potential impact on winter readiness and shall be integrated into the Plant's work week.

The review is documented as part of the Plan on PM #101602.

7. Perform Plant Insulation Walkdown. Perform a Plant walk down of the Critical Equipment's insulation and lagging and identify areas of insulation that should be considered for repair prior to winter operation. PM #55297 is in place to generate a work order for this review. Any corrective work is documented in Maximo by corrective work orders created during the Winter Readiness walkdown.
8. Winter Readiness Consumables and Supplies. A list of consumables and supplies kept in store for freeze protection is contained in Attachment 3 (Winter Readiness Consumables and Supplies). An inventory check is performed on by Operations personnel (PM #101602) as part of the Procedure prior to the Winter Period.
9. Test Portable Heaters and Heat Lamps. Portable space heaters used for freeze protection are kept in a designated storage area for winter supplies. An operational test is performed on these portable heaters annually by Operations personnel (PM #114288) as part of the

Plan prior to the Winter Period.

10. Test Permanent Building Space Heaters. Attachment 4 (Permanent Building Space Heaters) is not applicable. The Plant does not have any permanent building space heaters.
11. Check Glycol Concentration. The Plant's closed cooling water system is not designed to have glycol added to reduce the freezing point of the system. However, the Plant's diesel fire water pump cooling system needs to be checked for glycol concentration to ensure the freezing point is above the plant minimum temperature design prior to the Winter Period.  
  
PM# 116802 is performed annually for this check on the diesel fire water pump.
12. Space Heaters on Critical Instrument Breakers. Not applicable. There are no space heaters on critical breakers. Attachment 5 (Space Heater Check for Critical Breakers (Not Applicable))
13. Operation Check of Instruments with Instrument Box Heaters. PM# 117529 is performed to check the correct operation of all instruments with box heaters. A list of these instruments and their location is included in this Plan as Attachment 6 (List of Instrument with Box Heaters).
14. Installation and Disassembly of Temporary Wind Breaks / Enclosures. Windbreaks and temporary heaters are installed annually to protect critical equipment from freezing. PM #55295 is performed each year to erect wind breaks/enclosures. A map of temporary windbreak locations around the Plant is attached in Attachment 7 (Temporary Windbreaks).
15. Draining Equipment. As Attachment 8 (Draining Equipment) illustrates the gas turbine inlet chilling system in the Plant is required to be drained prior to the Winter Period. PM #115978 is written to complete this task.
16. Fuel Oil Handling Equipment. Not applicable. The Plant does not have any fuel oil handling equipment.
17. Icing Prevention Equipment. Not applicable. The Plant does not have any icing prevention equipment.
18. Additional Preparations for Susceptible Plants. Not applicable. The Plant is not located in a winter storm susceptible area.
19. Annual Plan Review. This Plan will be reviewed annually by Plant management. PM#101602 is in place to ensure the annual reviews are performed.

20. Personnel/Operator Training. Winter readiness refresher training is completed annually as part of the Plant's Procedure prior to the Winter Period. The training will include any applicable Plant modifications, past winter lesson's learned, alternative instrumentation should the Plant's primary instrumentation becomes unreliable.

Personnel and Operator Training is documented as part of the Plan on PM #101602 and attendance by Plant personnel should be documented in writing in Attachment 9 (Personnel/Operator Training) and retained.

21. Winter Readiness Action Timeline. Attachment 10 (Winter Readiness Action Timeline) of this Plan contains a timeline for winter readiness actions and milestones.

## 6.0 The Procedure

In accordance with the Standard, the Plant implements the Procedure when

1. Operational Checklist During Freezing Weather. When outside ambient air temperature at the Plant is predicted to [REDACTED] ("Winter Weather Conditions") the Plant Operations Team implements the Procedure which is stored in the Plant SharePoint, including completing the Freezing Weather Actions and Logsheets.

## 7.0 Pre-Winter Plant Status Reviews and Readiness Certification

Prior to the onset of the Winter Period each Plant Manager verifies winter readiness and formally communicates site status to the RVP (see example Attachment 11 (Baytown Winter Readiness Certification). RVPs review regional winter readiness status and certify status to the EVP Operations.

## 8.0 REFERENCES

- CSN-1021 (Winter Readiness Standard)
- CPN-714 (Records management)
- CSN-101 (WORK MANAGEMENT PROGRAM)
- Management OF Design Change Procedure

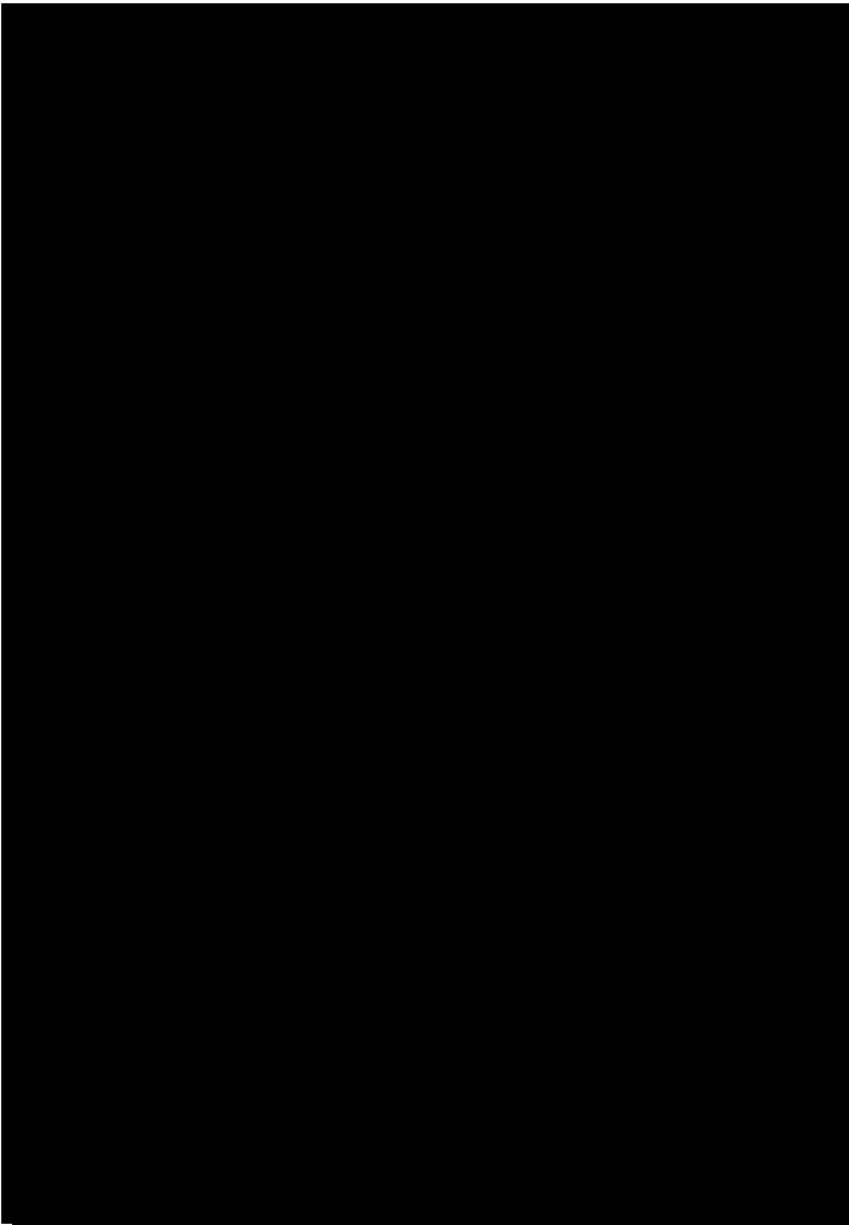
## SUPPORT DOCUMENTS

- Attachment 1: Critical Instrument List
- Attachment 2: Heat Tracing List
- Attachment 3: Winter Readiness Consumables and Supplies

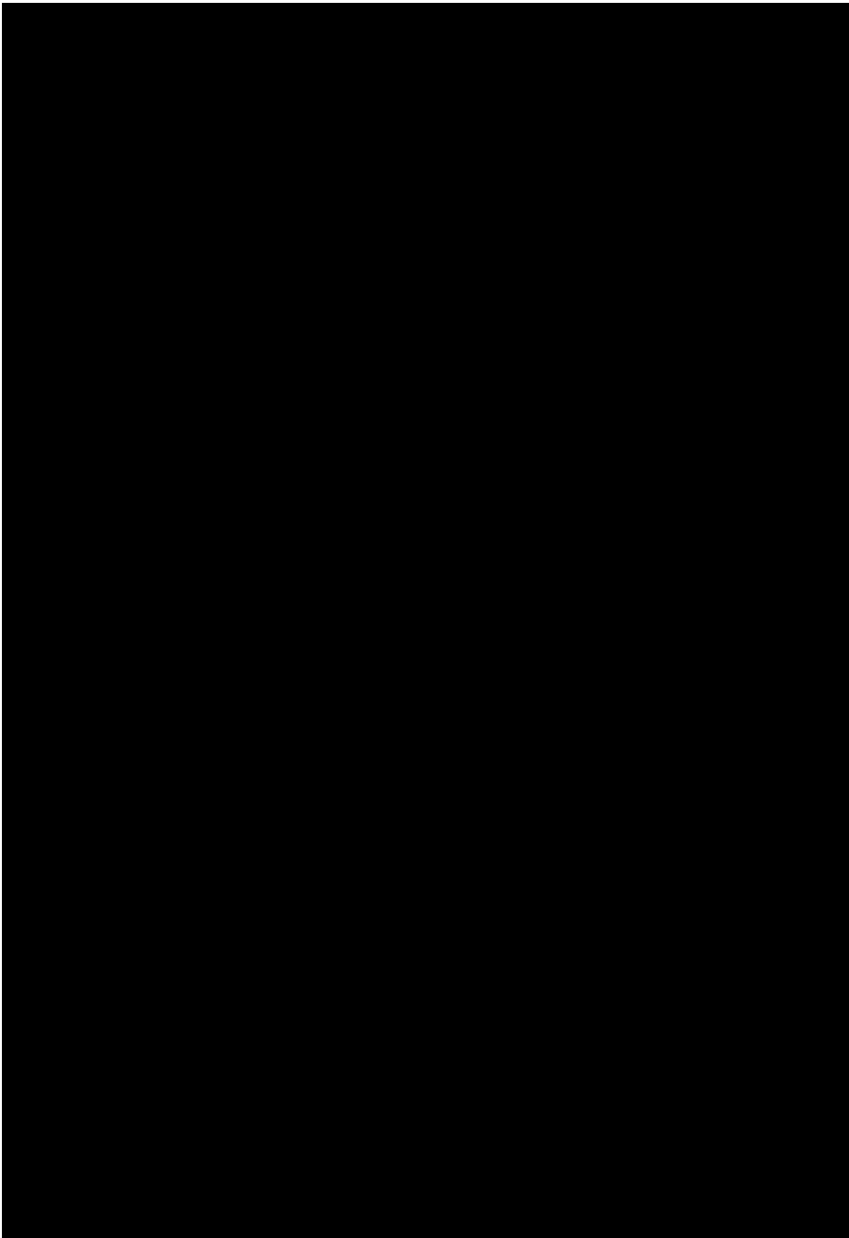
Attachment 4:	Permanent Building Space Heaters
Attachment 5:	Space Heater Check for Critical Equipment Breakers (Not Applicable)
Attachment 6:	Instrument Box Heater Check
Attachment 7:	Temporary Windbreaks
Attachment 8:	Draining Equipment
Attachment 9:	Personnel/Operator Training
Attachment 10:	Winter Readiness Actions Timeline
Attachment 11:	Baytown Winter Readiness Certification

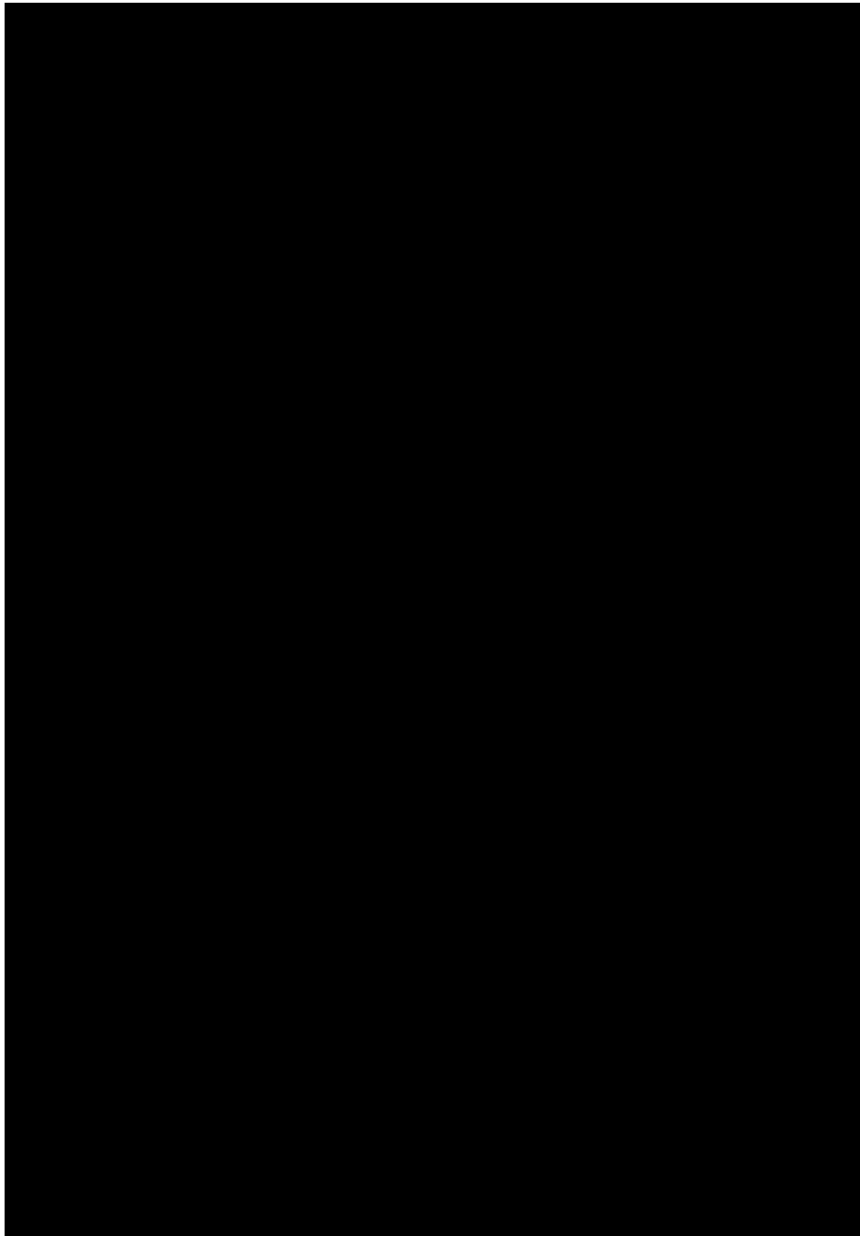
**Attachment 1: Critical Instrument List**

Unit	Tag No.	Description
[REDACTED]		











**Attachment 2: Heat Tracing List**

## Annual Heat Trace Panel Checklist (Gas Yard)

- |   |                     |       |
|---|---------------------|-------|
| 1 | Condition of panel? | _____ |
| 2 | Main breaker on?    | _____ |
| 3 | Panel energized?    | _____ |
| 4 | Breakers Tripped?   | _____ |
| 5 | Other problems?     | _____ |
| 6 | Work-Order Written? | _____ |

<u>Circuit Amps</u>	
1	19
2	20 N/A
3	21
4	22
5	23
6 N/A	24
7	25
8 N/A	26
9	27
10 N/A	28
11	29
12 N/A	30
13	31
14 N/A	32
15	33
16 N/A	34 N/A
17	35
18 N/A	36

Inspected by: \_\_\_\_\_ Date: \_\_\_\_\_

Note: "N/A" refers to spare breakers, not currently in use.

## Annual Heat Trace Panel Checklist (Aux Boilers)

- |   |                     |       |
|---|---------------------|-------|
| 1 | Condition of panel? | _____ |
| 2 | Main breaker on?    | _____ |
| 3 | Panel energized?    | _____ |
| 4 | Breakers Tripped?   | _____ |
| 5 | Other problems?     | _____ |
| 6 | Work-Order Written? | _____ |

<u>Circuit Amps</u>	
1	_____
2	_____
3	_____
4	_____
5	_____
6	N/A
7	_____
8	N/A
9	_____
10	N/A
11	_____
12	N/A
13	_____
14	N/A
15	_____
16	N/A
17	_____
18	N/A
19	_____
20	N/A
21	_____
22	_____
23	_____
24	_____
25	_____
26	_____
27	_____
28	_____
29	_____
30	_____
31	_____
32	_____
33	_____
34	N/A
35	_____
36	_____

Inspected by: \_\_\_\_\_

Date: \_\_\_\_\_

Note: "N/A" refers to spare breakers, not currently in use.