

**Attachment 3: Summer Readiness Action Timeline**

Key Milestone	Recommended Completion	Comments	PASADENA PM #
Initial Pre-Summer Readiness Meeting	November - December	Meeting to review: Plant Summer Readiness Plan, Open Corrective "Summer" Work Orders, and PM's	116895
Review Calpine Fleet Lessons Learned	November	Fleet Summer Lessons Learned from the Past Summer Provided by RVP's	116896
System Reviews Conducted	December - February	Reference Attachment 2	116893
Summer Readiness Certification by the Plant Manager	May	Provided to RVP. Reference Attachment 1	101920
Summer Readiness Activities Completed	June 1	This date may vary for specific sites based on location	116897
Post-Summer Meeting	September - October	Review specific plant lessons learned from the past summer	101921

## Attachment 4: Entity Guidance

### NERC REPORTS:

#### 2014 Summer Reliability Assessment - May 2014 - NERC

<http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2014SRA.pdf>

#### 2015 Summer Reliability Assessment – May 2015 – NERC

[http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2015\\_Summer\\_Reliability\\_Assessment.pdf](http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2015_Summer_Reliability_Assessment.pdf)

### GUIDANCE:

#### PJM - PJM Manual 14D Generator Operational Requirements (Section 7 – Pre-Summer Review)

<http://www.pjm.com/~media/documents/manuals/m14D.ashx>

#### PJM – PJM Manual M13 – Emergency Operations – (Section 3.4 Hot Weather Alert)

<http://www.pjm.com/~media/documents/manuals/m13-redline.ashx>





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## Standard Manual

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Standard: SUMMER READINESS PREPARATION – Plant Specific TXCTY

NUMBER: CSN-102B	REVISION: 1	Marlon Griffin	4-8-2022
	GENERAL	PLANT MANAGER	DATE

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## Purpose and Scope

This Standard details the Texas City Power Plants process for ensuring safe and reliable generating facility operation during summer weather conditions.

Key Areas addressed in this Standard are:

- Guidelines for the development of a Plant /Site Specific Summer Readiness Plan
- Timeline for major activities associated with Summer Readiness, including milestones for Pre-Summer Preparedness and Post-Summer Lessons Learned
- Identify Management Responsibilities
- Requires the utilization of the Maximo Work Management System for Summer Readiness planned activities and corrective work related to Summer reliability
- Documents Summer Readiness recordkeeping requirements

## Applicability

This Standard applies to Texas City Power Plant

## Definitions

**Summer Period:** June 1 through September 15 (may vary for specific plant locations – any variance from this definition, must be included in the plant specific Summer Readiness Plan). Sites in some geographical areas may have this period of time extended to include when extreme storm events may occur, such as hurricane season.

**Critical Equipment:** plant equipment that, during hot summer weather conditions, 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. The intent is to identify reliability issues that are directly related to hot weather, not reliability issues in general.

## References

CPN-714 (Records Management)

CSN-101 (Work Management Program)

Management of Change Procedure (Procedure Managed by Calpine Central Engineering)

## Responsibilities

### Regional Operations Vice Presidents

The Regional Operations Vice Presidents (RVPs) are responsible for certifying their region's Summer Readiness to the EVP for Power Operations after reviewing formal readiness attestations by the Plant/Area/General Managers. The RVPs are responsible for assuring each Plant/Site in their region

has site specific Summer Readiness Plans in place, based on the guidelines in this Standard. The RVP's should also share lessons learned across the Calpine fleet.

#### Plant/Area/General Manager

The Plant/Area/General Managers are responsible for ensuring that all site activities required for reliable Summer Operations are implemented, including:

- Developing and revising (based on lessons learned) the plant specific Summer Readiness Plan. The plan shall include all the recommendations included in this Standard as applicable to the specific plant/site.
- Performing or delegating site Summer Readiness Site Coordinator responsibilities.
- Approving site-specific Summer Readiness plans and activities, and assuring all summer readiness work that is identified is completed prior to the required summer completion date for all such work.
- Assure all site-specific Summer Readiness activities that are planned, and identified corrective work, are Maximo PM's or corrective work orders. All summer readiness planned and repair work is required to be documented in Maximo (using the program category "Seasonal", and the task category "Summer").
- Routinely updating the RVP on the site's Summer Readiness status.
- Verifying the site's Summer Readiness, and formally Certifying Readiness to the RVP prior to Summer.

#### Maintenance Manager

The Maintenance Manager is responsible for:

- Implementing the plant specific Summer Readiness Plan, and revising the Plan as required based on lessons learned.
- Assuring the Summer Readiness PM's and other activities are in Maximo and implemented in accordance with the timeline included in the plant's Summer Preparedness Plan (and document the implementation in Maximo using the program category "Seasonal", and the task category "Summer").
- During Summer Operation, ensure that equipment deficiencies identified (that could impact plant reliable operation during hot summer weather conditions) are addressed and corrected in a timely manner, with all repairs properly documented in Maximo.

Operations Manager

The Operations Manager is responsible for:

- Supporting the implementation of the Summer Readiness Plan.
- Provide input to the Systems Review for the Summer Readiness Plan.
- Review the on-going operations activities that are implemented during hot summer conditions, and identify by Work Order any issues that require immediate attention.
- Verifying that communications system is operational and backup communications are in place.

Site Summer Readiness Coordinator

Plant/Area/General Managers designate a Summer Readiness Coordinator for the site. The Site Summer Readiness Coordinators are responsible communicating and tracking activities needed to achieve sustained reliability and availability during hot summer weather conditions, and for routinely reporting to the Plant/Area/General Manager the status of the site's Summer readiness preparations. The Site Summer Readiness Coordinator supports the Operations and Maintenance Managers as required in performing their responsibilities as outlined above.

Specific responsibilities include:

- Chairing scheduled summer Readiness meetings at intervals appropriate to the site.
- Tracking and reporting status of the site's Summer readiness preparations.
- Leading and documenting the findings from the Summer Readiness system reviews.

**Process****Plant Specific Summer Readiness Plan Guidelines**

Each generation facility within Calpine shall develop a plant/site specific Summer Readiness Plan. The following are recommendations provided for consideration for each plant's specific Summer Readiness Plan:

1. Document the maximum plant design operating temperature to determine the highest ambient temperature at which the unit is able to reliability operate. Review any modifications performed to the plant equipment (or addition of new equipment) over the past year to assure these modifications meet the maximum plant design operating temperature, or if different, document the maximum temperature limitations of these modifications.

Located in Appendix Tab 1

2. Review the past summer issues and experience with any equipment. Document this review and the Actions required to prevent reoccurrence. Any identified Action Items are to be documented and tracked in the Maximo system.

PM# 117972 Supporting Document in Appendix Tab 2

3. Identify the Critical Equipment to the plants operation that may be impacted by hot summer conditions.

PM# 117973 Supporting Document in Appendix Tab 3

4. Review open corrective work orders under the program category "Seasonal", and the task category "Summer", and those that may impact summer reliability should be considered for correction prior to summer operation. Open corrective work orders that may impact summer reliability (and are approved to be performed) shall be managed by the Site Summer Readiness Coordinator, and the status reported regularly to the Plant Manager, Operations Manager, and Maintenance Manager.

PM# 117983 Supporting Document in Appendix Tab 4

5. Perform a walkdown (to be scheduled in Maximo as a Summer Readiness PM) of the Plant Systems, and identify equipment that should be considered for repairs prior to summer operation. This work requires documentation in Maximo, by corrective work orders created from the Summer Readiness walkdown PM.

PM# 117984 Supporting Document in Appendix Tab 5

6. Conduct a system by system review of the Critical Equipment that may impact plant reliability during summer hot weather conditions. Use Attachment 2 (System Readiness Review) to document and identify all actions to be considered to ensure systems shall function properly and reliably through the summer. These actions shall also be documented in Maximo, by

corrective work orders using the program category "Seasonal", and the task category "Summer").

PM# 117985 Supporting Document in Appendix Tab 3

7. Sites that are located in geographical areas that may be susceptible to high winds, hurricanes, heavy rains, localized flooding, and other extreme storm related events will require additional preparations, and these must be addressed in the site specific Summer Readiness Plan. These additional preparations may include: equipment and supplies to have staged at the plant (i.e., emergency generator, sand bags, etc.) and additional checklists for preparing for these extreme storm events, and for use while these events are taking place.

Not Applicable

8. The Plant Manager, Maintenance Manager, Operations Manager, Plant Engineer, and Site Winter Readiness Coordinator should review this Standard annually prior to the initial summer readiness meeting conducted at the plant each year.

PM# 117986 Supporting Document in Appendix Tab 6

9. The plant specific Summer Readiness Plan shall include a Summer Readiness Action Timeline, which should be included in the plant specific Summer Readiness Plan (dates to be site specific). Key milestones that must be included (recommended month(s) for completion of the task is included in parenthesis):
  - a. Initial Site-Specific Pre-Summer Maintenance, Operations, and Procurement Meeting (November - December):
    - i. Review the implementation of the Plant summer Readiness Plan.
    - ii. All required PM's and corrective work to be scheduled in Maximo.
    - iii. Corrective Work Orders should be reviewed that are related to Summer operation reliability, and those that must be completed prior to summer prioritized.
  - b. Calpine fleet lessons learned (to be provided by RVP's), and general industrial best practices that may have become known (November).
  - c. System reviews and scope recommendations completed (December- February).
  - d. Final work scope and actions required prior to summer in place and approved by the Plant Manager (February - March).
  - e. Site-Specific Summer Readiness Reviews and Certification of Readiness (Plant Manager to RVP). This date to be provided to the Plant Manager by the RVP each year (typically in May).
  - f. Post-Summer meeting to review issues and incorporate lessons learned into the Summer Readiness Plan (September - October).
  - g. Date when all Summer Preparations must be completed. **This is June 1 for all Calpine generation facilities.** Note that in some areas of the country this date may vary from June 1. Exceptions to this completion date must be approved by the RVP for the specific plant.

**Pre-Summer Site System Reviews and Readiness Certification**

Prior to the onset of the Summer Period each Plant Manager verifies summer readiness and formally communicates site status to the RVP (see example Attachment 1 - Summer Readiness Certification). RVPs review regional Summer Readiness status and certify status to the EVP Operations

PM#117987 Supporting Document in Appendix Tab 7

**Records**

Any records generated as a result of this process shall be filed and retained in accordance with CPN-714 (Records Management). Processes and standards referenced in this document shall prescribe any specific records requirements within those documents.

**Support Documents**

Attachment 1 (Typical Summer Readiness Certification Letter)

Attachment 2 (Typical Summer Readiness Review)

Attachment 3 (Summer Readiness Action Timeline)

Attachment 4 (Entity Guidance)

## SUMMER READINESS PREPARATION

STANDARD NUMBER: CSN-102B

REVISION: 1

Attachment 1

Typical Summer Readiness Certification Letter

Page 1 of 1

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To: (Regional VP, Operations Name)

From: (Plant/General Manager Name)

Subject: Summer Readiness

### Certification

(Plant Name) has reviewed the requirements of the Plant Specific Plans related to Summer Readiness preparation and response and by copy of this letter is ready to certify (Plant Name) summer readiness. "[Plant] has completed review of plant summer readiness and implemented preventive and corrective actions required to provide reasonable assurance of operation during foreseeable summer conditions at the site. In-progress items relating to summer operation are summarized below.

A. The basis for our certification is as follows:

1. Significant outcomes of system reviews
2. Status of preventive maintenance affecting Summer Readiness
3. Status of corrective maintenance affecting Summer Readiness
6. Status of modifications/projects affecting Summer Readiness
7. Other

B. Summer readiness items not completed

1. Reason
2. Open Actions Items
3. Owner & Due Date



## SUMMER READINESS PREPARATION STANDARD

STANDARD NUMBER: CSN-102B

## Attachment 2

## System Readiness Review

[illegible]

Plant Systems to be reviewed include (as applicable):

Raw Water	Duct Burners	Gland Seal Steam
Cooling Tower Make-up	Condenser	Lube Oil
Cooling Tower and Circ Water	Inlet Cooling, Evap Coolers	Seal Oil
Chemical Feed	Fuel Gas	Steam Turbine
Closed Cooling	Generator Hydrogen	Gas Turbine
Instrument Air	Batteries	Transformer and Bushings
Condensate	Switchyard Breakers	DCS
HP and IP Feedwater	Generator Circuit Breakers	Potable Water (including Safety Showers)
HRSB (including SCR)	LCI's and Starting Motors	Fire Protection
Blowdown (HRSB and Cooling Tower, other)	Condenser	Aux Boiler

### Attachment 3: Summer Readiness Action Timeline

Key Milestone	Recommended Completion	Comments	TXC PM #
Initial Pre-Summer Readiness Meeting	November - December	Meeting to review: Plant Summer Readiness Plan, Open Corrective "Summer" Work Orders, and PM's	117983
Review Calpine Fleet Lessons Learned	November	Fleet Summer Lessons Learned from the Past Summer Provided by RVP's	117972
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Summer Readiness Activities Completed	June 1	This date may vary for specific sites based on location	117986
Post-Summer Meeting	September - October	Review specific plant lessons learned from the past summer	117972

## Attachment 4: Entity Guidance

### NERC REPORTS:

2014 Summer Reliability Assessment - May 2014 - NERC

<http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2014SRA.pdf>

2015 Summer Reliability Assessment – May 2015 – NERC

[http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2015\\_Summer\\_Reliability\\_Assessment.pdf](http://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/2015_Summer_Reliability_Assessment.pdf)

### REGIONAL GUIDANCE:

PJM - PJM Manual 14D Generator Operational Requirements (Section 7 – Pre-Summer Review)

<http://www.pjm.com/~media/documents/manuals/m14D.ashx>

PJM – PJM Manual M13 – Emergency Operations – (Section 3.4 Hot Weather Alert)

<http://www.pjm.com/~media/documents/manuals/m13-redline.ashx>

## **APPENDIX**

Appendix Documents are located in the Seasonal Readiness folder on the Texas City Public Drive

- Tab 1 – Maximum Designed Operating Temperature
- Tab 2 – PM-1Y POST SUMMER (SUMMER READINESS) MEETING
- Tab 3 - PM-1Y CONDUCT SUMMER READINESS SYSTEM REVIEWS
- Tab 4 – PM-1Y SUMMER READINESS OPEN CORRECTIVE WORK ORDER REVIEW
- Tab 5 - PM-1Y SUMMER READINESS WALKDOWN OF PLANT SYSTEMS
- Tab 6 - PM-1Y SUMMER READINESS STANDARD REVIEW
- Tab 7 - PM-1Y SUMMER READINESS CERTIFICATION BY PLANT MANAGER
- Tab 8 - PM-1Y INITIAL PRE-SUMMER READINESS MEETING





Title:	PGC Extreme Hot Weather Procedure
Document No:	ER-CPN-006
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to define the actions taken by Calpine's Power Generating Company ("PGC") that are required when ERCOT releases an Operation Condition Notice ("OCN"), watch, advisory or emergency for an Extreme Hot Weather event. The procedure is part of the Seasonal Readiness Plan for the summer and to the extent it conflicts with the Summer Readiness Plan, the Summer Readiness Plan shall prevail.

## DEFINITIONS

**Extreme Hot Weather:** Outside ambient temperatures which cause ERCOT to issue a Extreme Hot Weather Notification to the PGC's qualifying scheduling entity (QSE) instructing the PGC to do the following:

- (a) Update COPs and HSLs when conditions change as soon practicable,
- (b) Review fuel supplies and notify ERCOT of any known or anticipated fuel restrictions,
- (c) Review Planned Resource outages and consider delaying maintenance,
- (d) Review and implement weatherization and emergency operating procedures and notify ERCOT of any changes or conditions that could affect System Reliability.

**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 Readiness Plans

## Process for Preparing for Extreme Hot Weather Event

1. ERCOT initiates a notification of OCN/Advisory/Watch/Emergency for Extreme Hot Weather for a day and time period. Script defined above.
2. Extreme Hot Weather Notification flows from the power generation dispatch desk to each power plant via procedural email. Request is to review and/or cancel upcoming outages during time frames communicated in the notification.
3. During Extreme Hot Weather time frames, plant teams must take extra precautions to not perform any work that could result in a trip or reduction of power output.

Title:	PGC Extreme Hot Weather Procedure
Document No:	ER-CPN-006
Effective Date:	April 12, 2022
Region:	ERCOT

4. Reduce operational start-up risk by starting units prior to the notification time period and continuously run through the time period.
5. Monitor critical systems: Inlet cooling (chillers, evaps), duct burners, PAG, Peak-fire), communicate operational issues to the Plant Manager and Operations Manager and work return to service in a safe and timely manner
6. Review open Work Orders that have been coded to Summer Seasonal Readiness Category in Maximo as required in the plant specific Summer Readiness Plan

## RESPONSIBILITIES

The roles and responsibilities of plant staff associated with this policy are the same as that found in the site specific Summer Readiness Plans.

## RECORDS

None.

## REVISION CONTROL

Revision date	Reviser	Rationale for revision
New Issue	R. Hall	

**Annex 2 – Water Shortage Annex**





Title:	Water Shortage Procedure
Document No:	ER-CPN-005
Effective Date:	April 12, 2022
Region:	ERCOT

## PURPOSE AND SCOPE

The purpose of this procedure is to define the actions taken by Calpine's Power Generating Company ("PGC") resulting from a shortage of raw water supply to the plant driven by droughts or other situations that would reduce or eliminate raw water flow to the plant. The objective of this procedure is to utilize the water available at the plant to optimize power generation output.

## DEFINITIONS

**Demin Water:** High purity processed water used in the steam cycle to generate steam to drive the steam turbine

**Cooling Tower Make Up:** Raw water used for cooling purposes in plant cooling towers and Open auxiliary cooling water systems

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

**Service Water:** If applicable, water which may be used for gland cooling or other semi-clean water applications

**Water Shortage:** A lack of adequate, available water caused by drought or other condition to meet normal demands

## REFERENCES

None.

## GENERAL INFORMATION

Calpine's overarching objective during a Water Shortage is to ensure that impacts to Calpine operations are minimized during such periods of time.

## RESPONSIBILITIES

Each Calpine facility Plant Manager and the Regional Vice President is responsible for ensuring the implementation of this procedure.

## PROCESS AND PROCEDURES

### Prior to Water Shortage

#### Drought Induced Water Shortages

Prior to a Water Shortage, Plant Management, Calpine's Meteorologist and the Regional Vice President, as applicable will do, among other things the following:

Title:	<b>Water Shortage Procedure</b>
Document No:	ER-CPN-005
Effective Date:	April 12, 2022
Region:	ERCOT

1. Plan:

- Actively monitor local and regional drought conditions;
- Monitor water supply and calculate how long each facility can operate with reduced water supply; and
- Know facility largest water users and be aware of usage patterns in order to determine the most effective conservation practices for plant systems;

2. Coordination

- Discuss potential drought and conservation measures with water suppliers;
- Understand each water suppliers' Drought Contingency Plan; and
- Communicate with steam host, if applicable, to discuss operational impacts

3. Mitigation

- Identify mitigation and long term adaption measures that increase resilience; and
- Understand each water suppliers Drought Contingency Plan

Potable Water or 3<sup>rd</sup> Party Supply Water Shortages / System Failures

Prior to a Water Shortage, Plant Management, Calpine's Meteorologist and the Regional Vice President, as applicable will do, among other things the following:

1. Plan:

- Actively monitor supply impacts and outage durations;
- Monitor water supply and calculate how long each facility can operate with reduced water supply; and
- Know facility largest water users and be aware of usage patterns in order to determine the most effective conservation practices for plant systems;

2. Coordination

- Discuss potential measures with water suppliers;
- Add additional means and methods to assess alternative water supplies
- Understand each water suppliers Contingency Plan; and
- Communicate with steam host, if applicable, to discuss operational impacts

3. Mitigation

- Identify mitigation and long term adaption measures that increase resilience; and
- Understand each water suppliers contingency plan

Title:	Water Shortage Procedure
Document No:	ER-CPN-005
Effective Date:	April 12, 2022
Region:	ERCOT

### **During Water Shortage**

To minimize the impact of a Water Shortage, Calpine should, 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 should coordinate water usage with system load to mitigate any impacts from generation losses.

### **RECORDS**

None.

### **REVISION CONTROL**

Revision date	Reviser	Rationale for revision
New Issue	R. Hall	

**Annex 3 – Restoration of Service Annex**



OPERATIONAL  
EXCELLENCE



## Conduct of Operations Standard

### Working Group Team:

Larry Small - Operations Sponsor  
Bob Keck - East Region  
Glenn Calloway - North Central Region  
Cameron White - West Region  
Mike Puccioni - Geysers  
Lyle Eubank - Texas Region  
Melvin Duran - North Central

Matt VanHorn - East Region  
Joe Hembrough - Operation Analytics  
Dave Poston - Engineering  
Tony Wiseman - EHS Training  
Heidi Whidden - EHS  
Jody Batten - West

### Approved for Deployment:

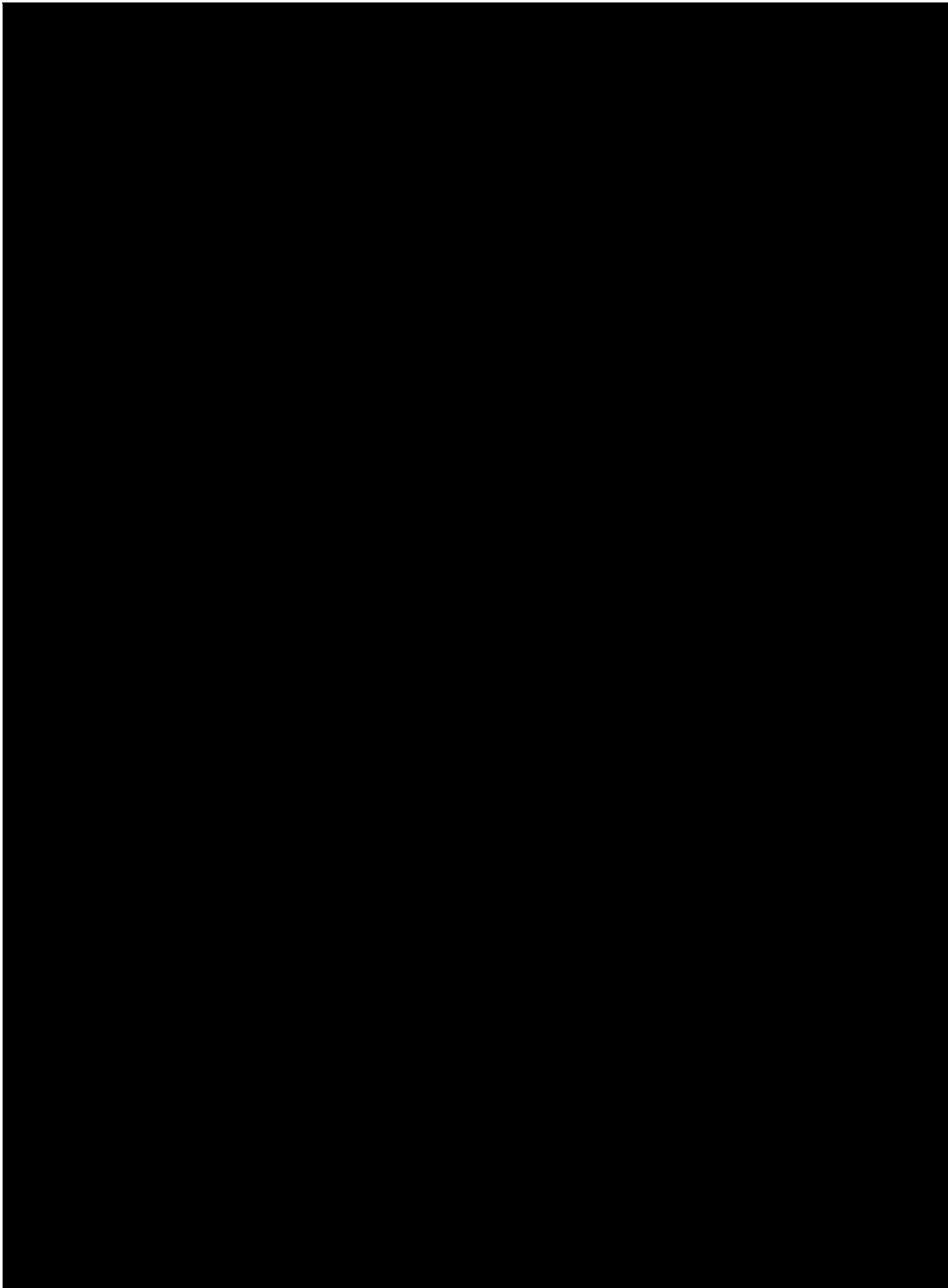
EVP – CPO	Charlie Gates
SVP – Operations	Michael Del Casale
SVP – Shared Services	Rick Colgan
VP - EHS	Bonnie Schwartz
RVP – Geysers	James Kluesener
RVP – East	William Ferguson
RVP – West	Robert Parker
RVP – North Central	Teresa Wilson
RVP - Central	Ronald C. Hall
VP – Outage Services	Chris German
VP – Engineering and Major Projects	William Valagura

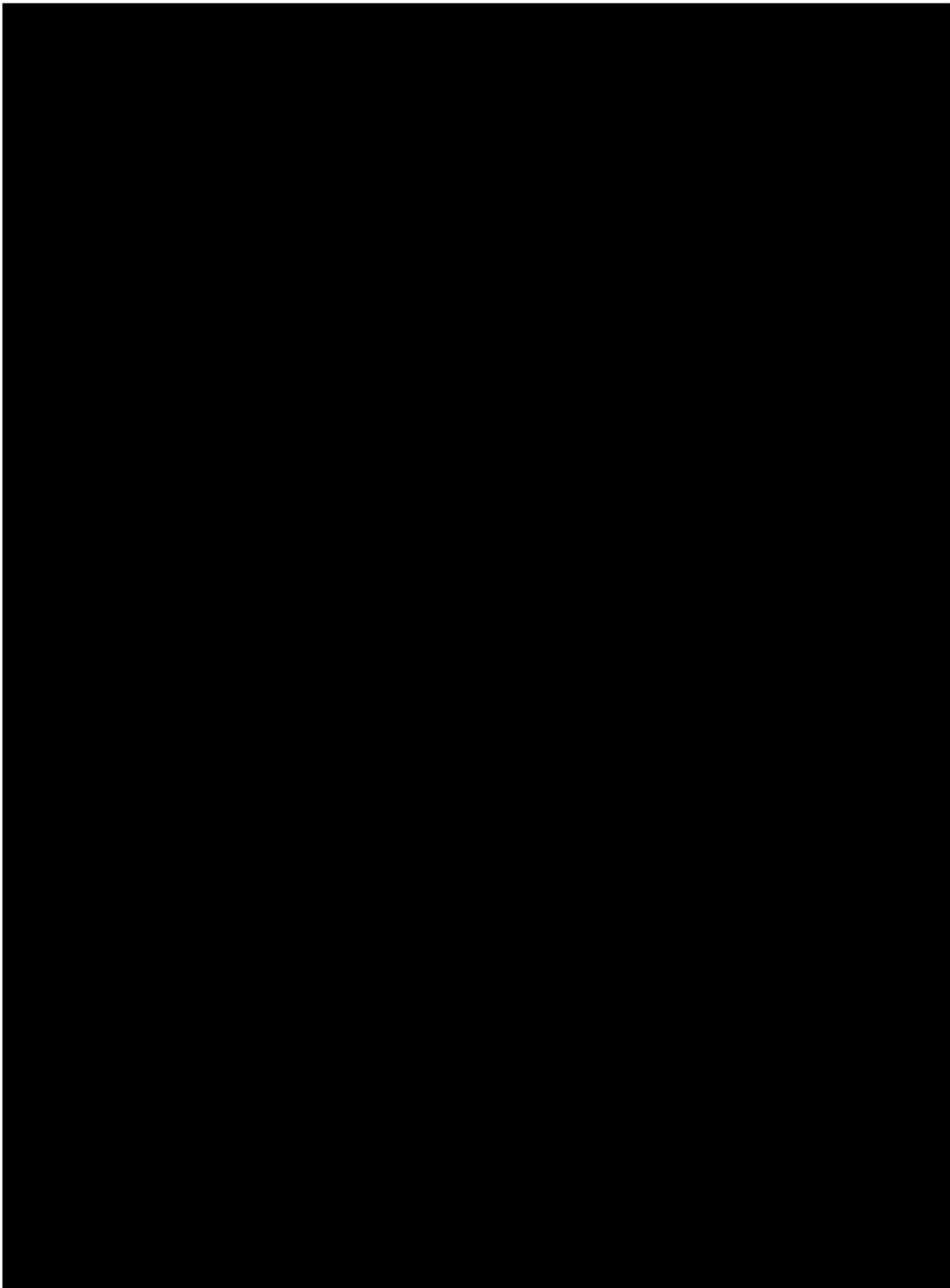




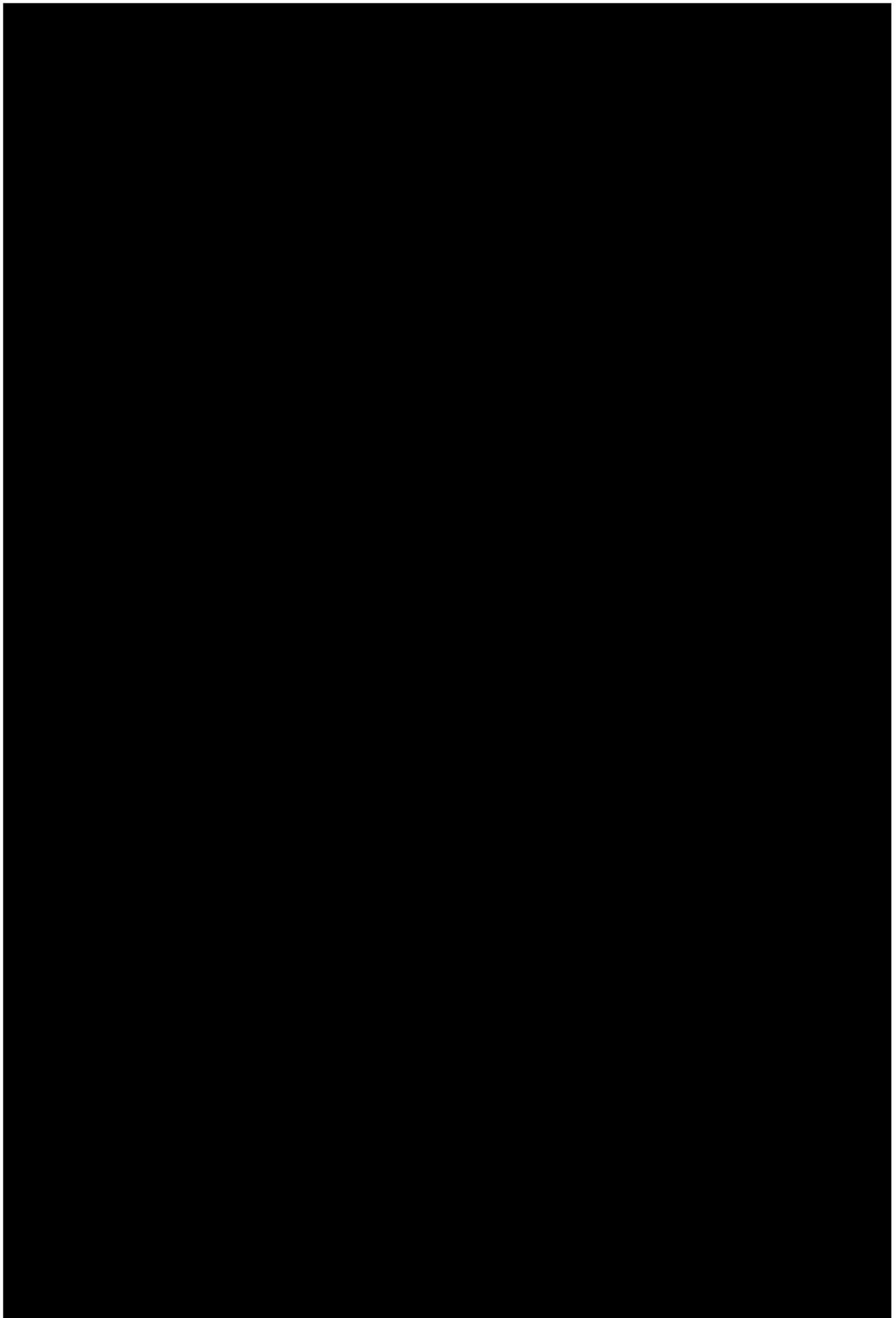


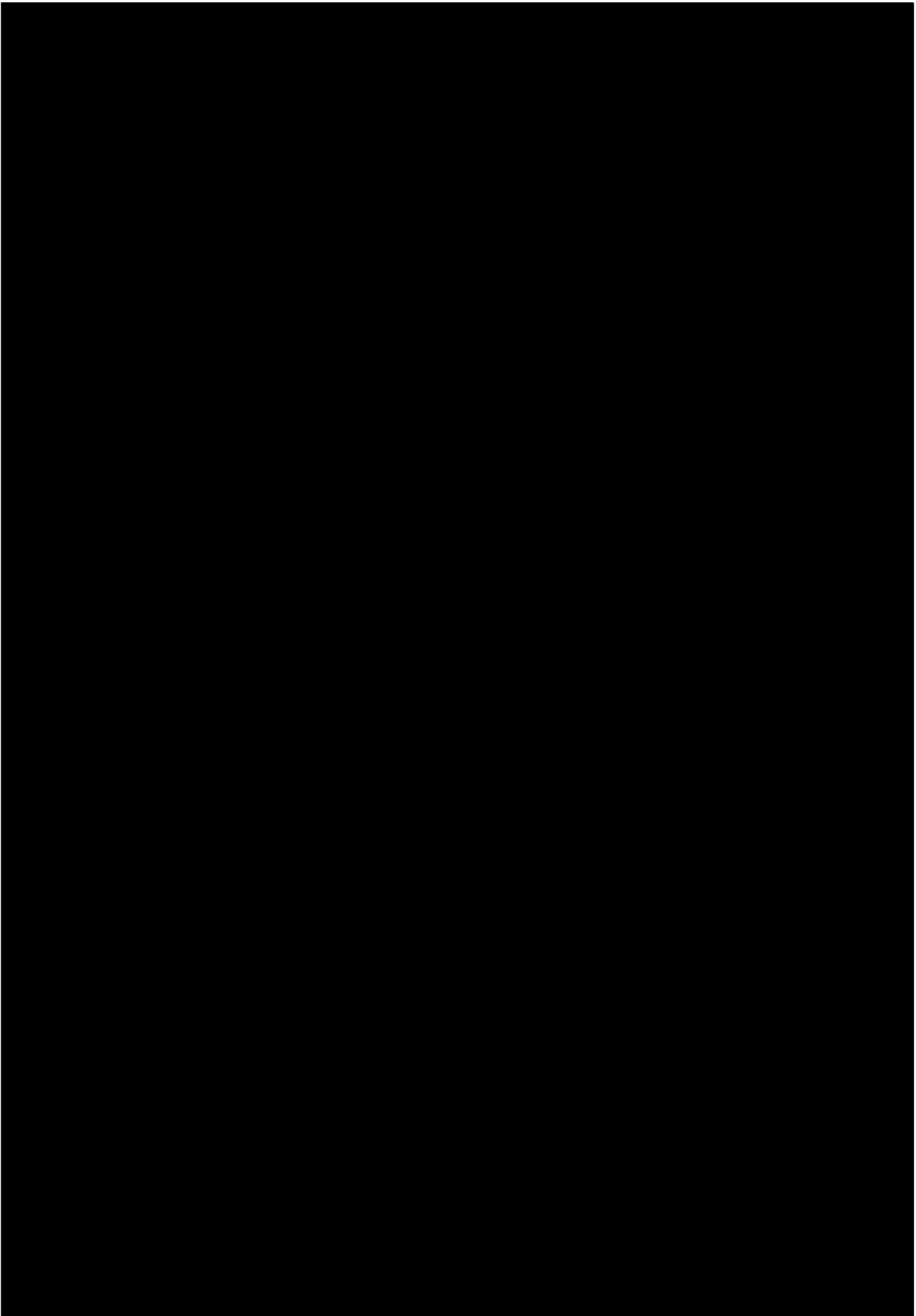


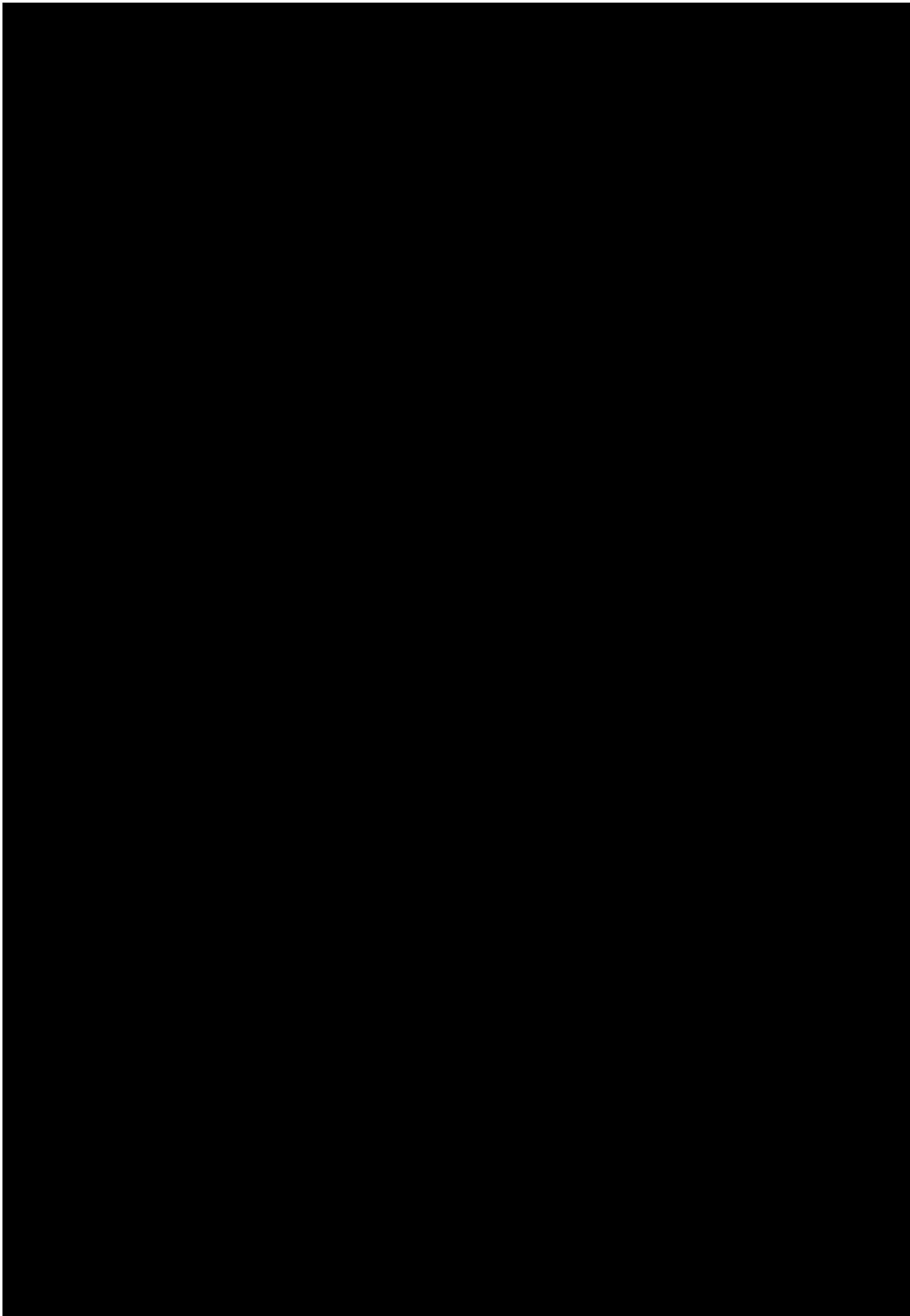


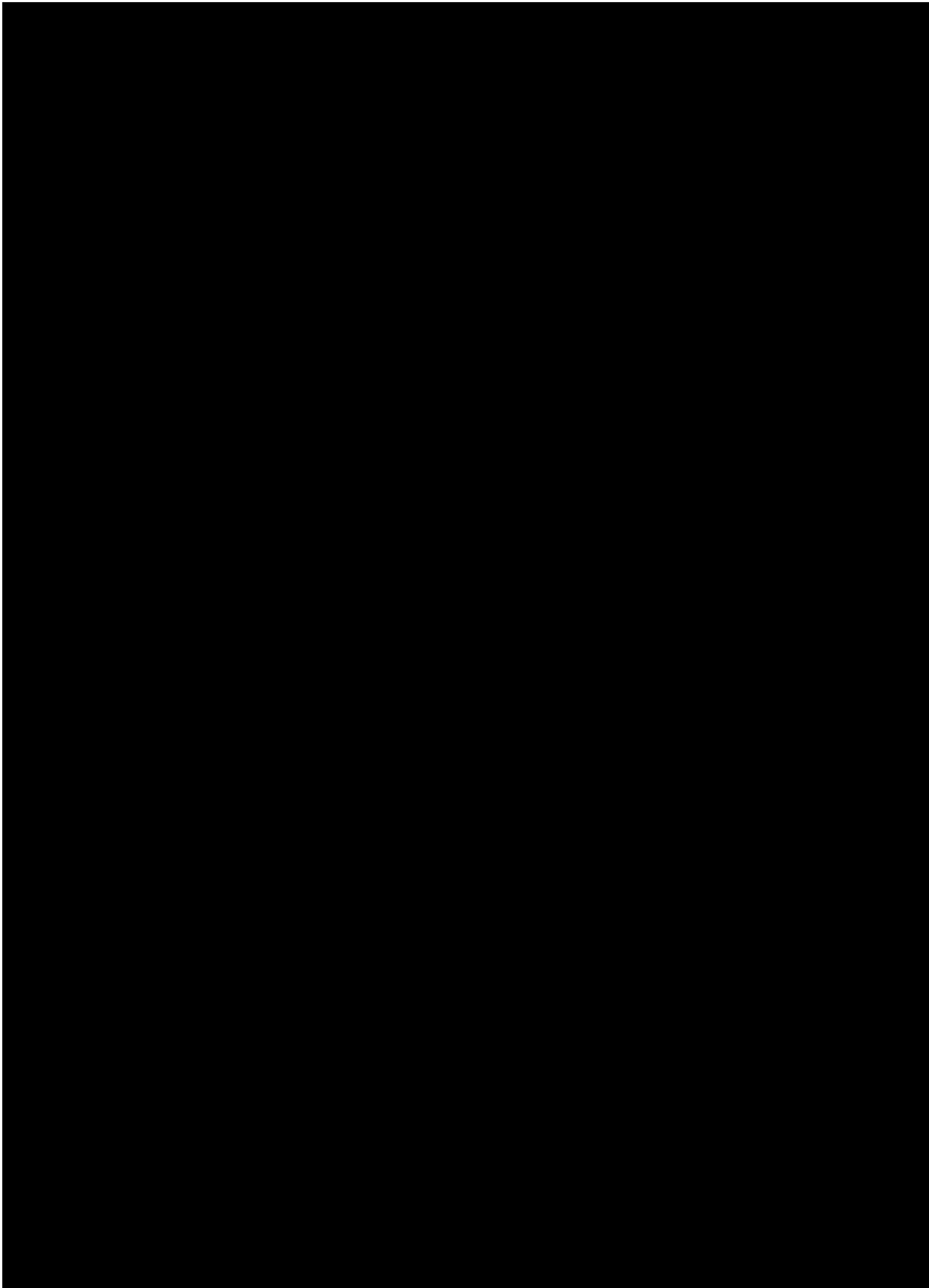


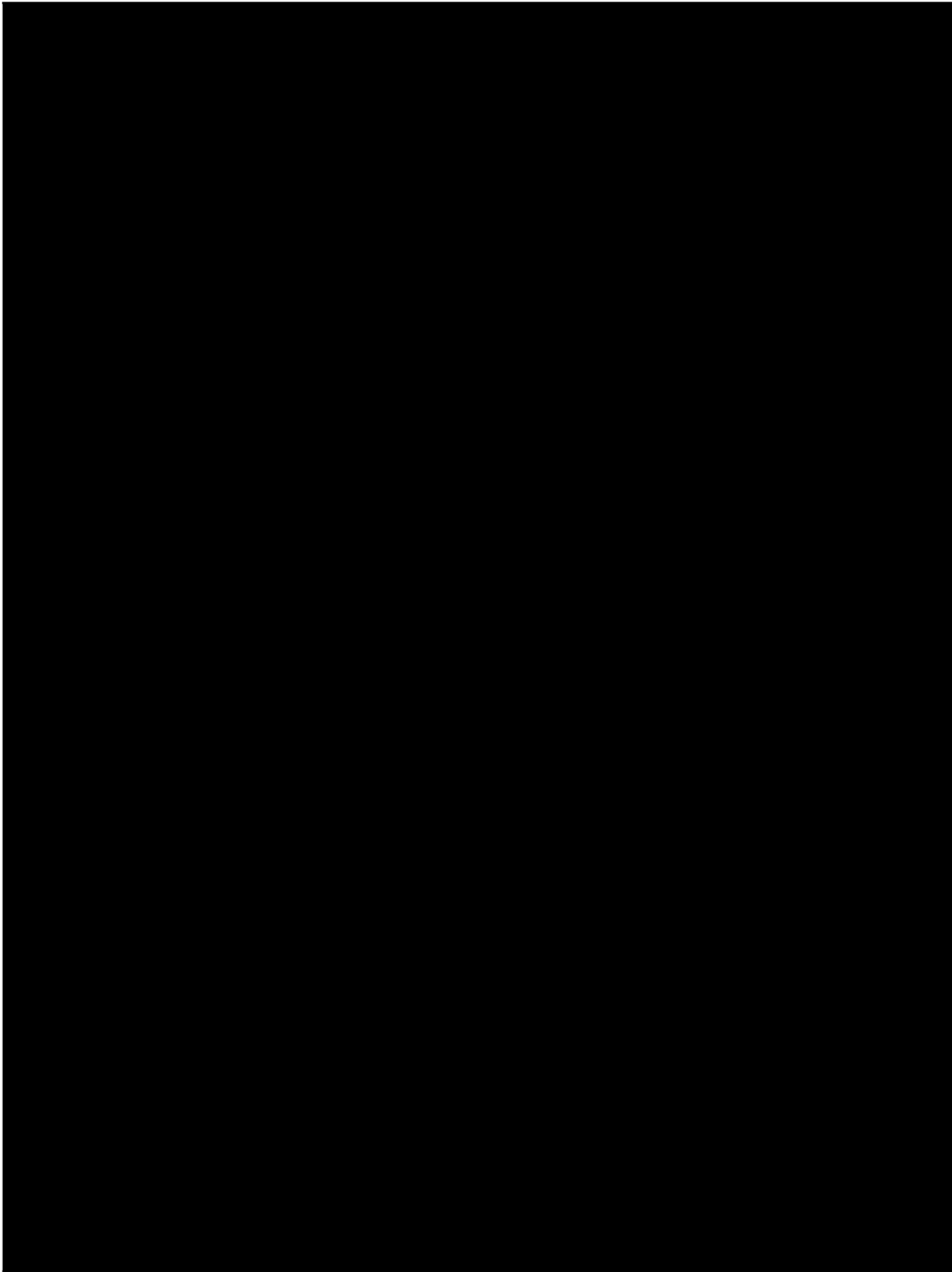




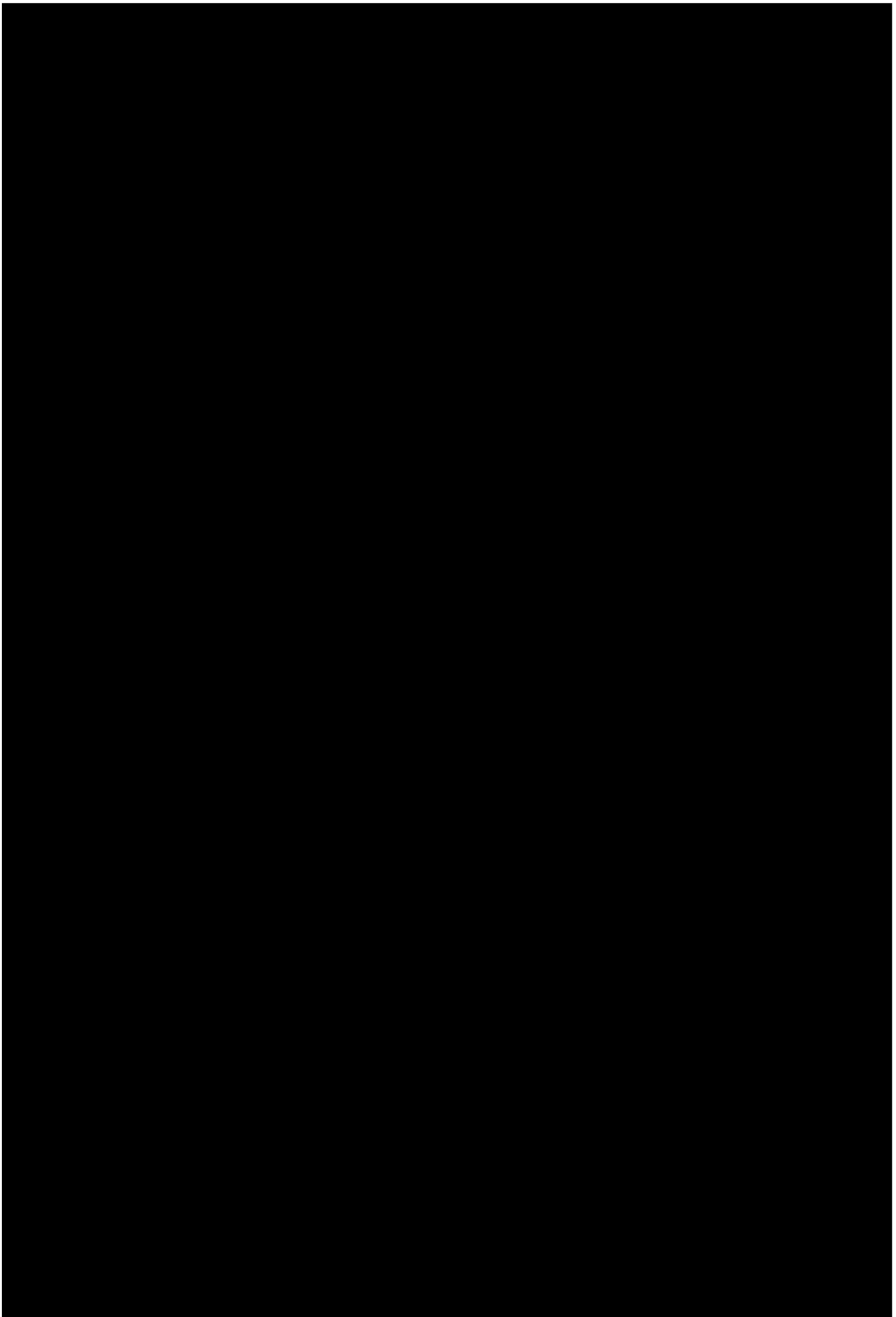


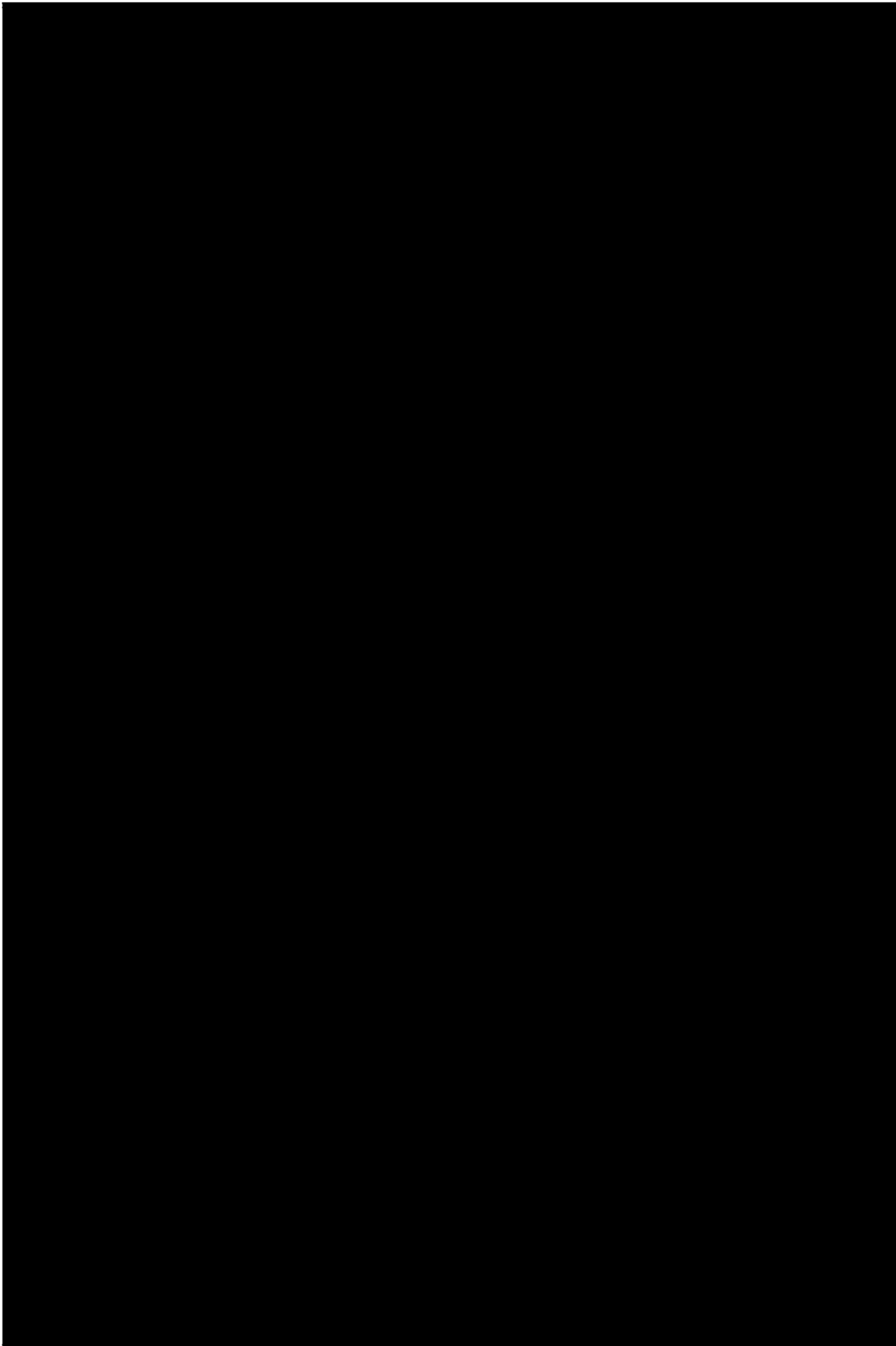


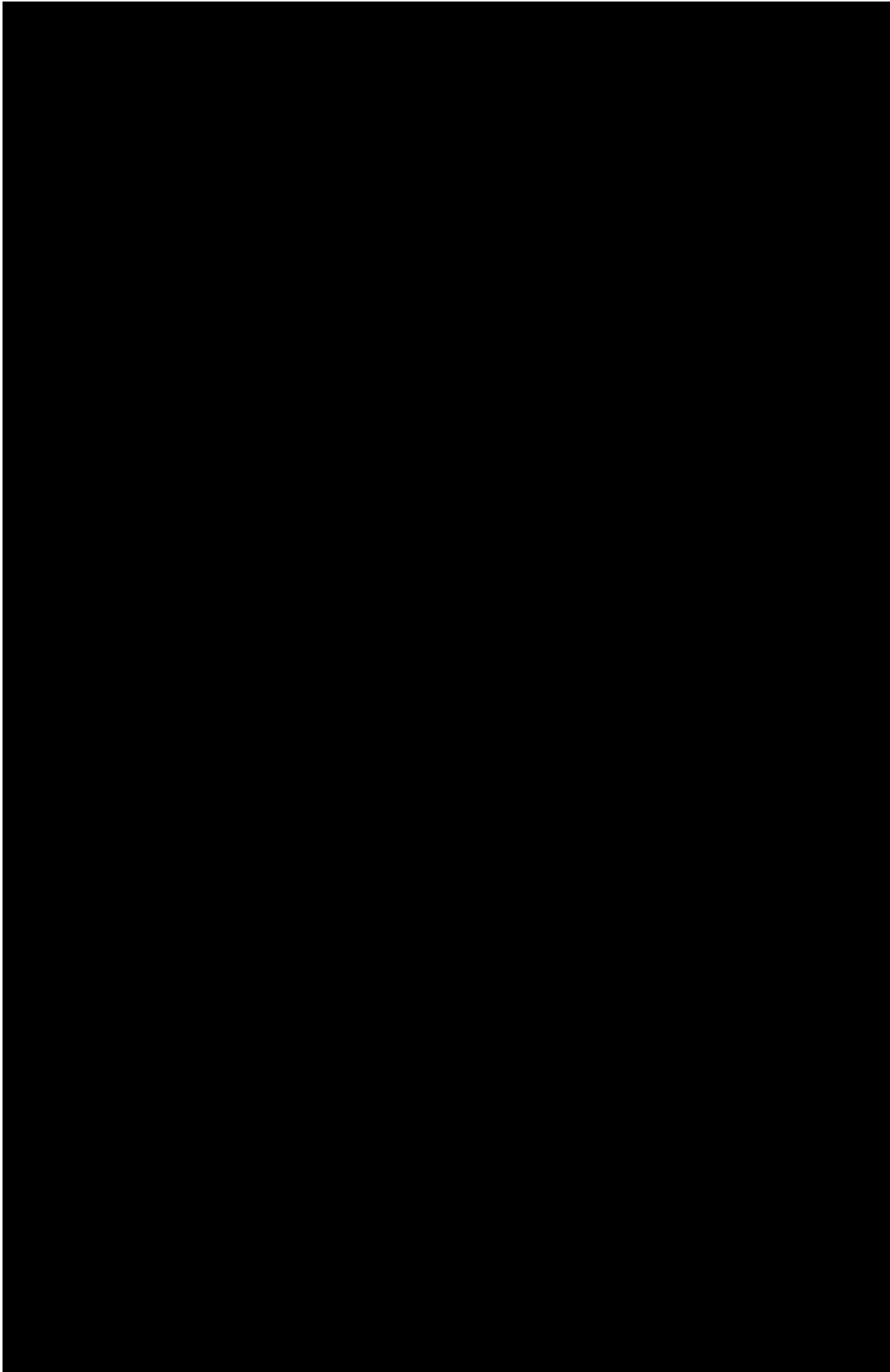






























































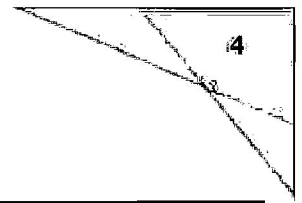
**PANDEMIC  
GUIDANCE DOCUMENT  
POWER PLANT OPERATING TEAMS  
Revision 5  
January 22, 2021**

**PANDEMIC GUIDANCE DOCUMENT**

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## REVISION SUMMARY NO. 2 (March 27 to April 16, 2020)

SECTION	ITEM NO.	DESCRIPTION
S1	No. 2	Expanded description for social distancing
S1	No. 6	Refined conformance to community obligations and expectations
S1	No. 9 - 13	Added recommendations for wearing masks
S2	No. 2	Refreshed to align with current policy due to limited ability to get COVID test
S2	No. 3	Added temperature screening for Calpine employee visiting power plants
S2	No. 4	Clarified request for PTO
S2	No. 5 - 7	Inserted new items 5 – 7 with updated PTO guidance. Renumbered sequence
S2	No. 9	Improved guidance clarity
S2	No. 18	Changed “planned” to “critical”
S2	No. 24	Muster areas / Plant Evacuations / Shelter in Place
S2	No. 25	Added provisions for employee personal use of critical supplies
S2	No. 26	Common Areas and Vending Machines
S2	No. 27	Following local guidance and restrictions
S2	No. 28	New – California Meal Periods (California Plants Only)
S5	No. 1	Added Spanish version of COVID-19 Contractor / Visitor Questionnaire
S5	No. 1	Added exemption for GE / Siemens for OS work
S5	No. 10	New - Requirements for Contractor Screening & Exceptions
S5	No. 11	Steps required before implementing temperature screenings
S5	No. 12	New – Guidance for Temperature Screenings
S5	No. 13	Actions for Contractors or Visitors showing temperatures above 100.4°F
S6	Title	Added “Site Visits”
S6	No. 2	Expanded requirements for visitors approved for essential plant visits
S6	No. 4	Referenced Section 1, Item 4 for employee travel and return to duty
S7	No. 11	Add in areas for Employee off shift decompression under sequestration.
S8	No. 1	Revised and added clarity around what would trigger sequestration
S8	No. 9	Included a recommendation for plants to have trial runs on food orders
S9	No. 3.c	Corrected language for off shift pay structure
S9	No. 5	Added clarity on FO work during a sequestration event
S11	No. 1	Referenced changed from Tanmoy Kumar to SCS/Procurement
S11	No. 4	Added hit spots to IT lists
Attachment	New 1	Use of Masks; Recommendations and Guidance
Attachment	No. 2 - 4	Renumbered, formerly Attachments 1 - 3
Attachment	New 5	California Bay Area Plants – Social Distancing Protocol Template
Attachment	No. 6 -8	Renumbered. Formerly Attachment 4 - 6
Attachment	No. 8	Updated Contractor / Visitor Questionnaire added
Attachment	New 9	Spanish version of Contractor / Visitor Questionnaire Added
Attachment	New 10	Guidance Temperature Screening for Contractors / Visitors
Attachment	No. 11 - 14	Renumbered – Formerly Attachment 7 - 10



## PANDEMIC GUIDANCE DOCUMENT

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Attachment	No. 11	Revised to include SYSCO food option
Attachment	No. 13	Included additional best practices

**PANDEMIC GUIDANCE DOCUMENT**

**REVISION SUMMARY NO. 3 (April 16, 2020 to June 5, 2020)**

SECTION	ITEM NO.	DESCRIPTION
S1	No. 6.a	Corrected note. CDC does not have state to state restrictions, only states do
S1	New No. 7	Added safety note to implement safe practices away from work
S1	No. 8 - 14	Renumbered to account for New No. 7 (Was 7 – 13)
S1	No. 10	Attachment 1- Refreshed
S1	No. 11	Removed line reference to “If dust masks are unavailable” added requirement for mask to be worn if social distancing cannot be met
S1	New 14	Employee provided mask offensive designs
S1	No. 15	Formerly No. 14
S2	No. 2	Policy is in place for PTO reimbursement – corrected tense of sentence
S2	No. 3.b	Added reference to new Admin Building Guidance
S2	No. 15	Added sub-bullets a & b about mask inventory and non-contact thermometers
S2	No. 17	Revised and added reference to structured cost tracking metric
S2	No. 26.d	New – added microwave, stove top, and conventional ovens.
S2	No. 27	Modified to read a general reference to local guidance. Examples deleted and moved to Section 13 (Newly added)
S2	New No. 28	Add requirement for Calpine temp employees serving in Calpine roles
S2	New No. 29	Added restrictions for the number of personnel allowed on elevators
S2	No. 30	Formerly No. 28
S5	No. 7	Added reference to new Admin Building Guidelines
S5	No. 10	Clarified Gate Screen Exceptions
S5	No. 11	Clarified that OS/Engineering notifications are only required when their contractors are coming to the site
S5	No. 12b.i	Added new 12.b.i – For screening when gate is manned
S5	New 12.b.ii	A Added new 12.b.ii – For screening options without gate manning
S5	12biii— 12.b.ix	Renumbered
S5	New No. 14	Monitoring health of contractors by Contractor Supt / Foreman
S5	New 15	Add Questionnaire for use when investigating Contractor COVID events
S6	No. 1	Clarified approval sequence
S8	All	Marked no action required - demobilizing
S12	New	RTW Guidance Document
S13	New	State and Local Guidance
S14	New	Added OSHA References
S16	No. 1	Added note that meeting days will be adjusted based on need
S15 – 16	-	Formerly S12-S13, Renumbered
Attachment	No. 1	Superseded and replaced with new Attachment 1
Attachment	New No. 4	PTO Reimbursement Request (Non-Union)
Attachment	New No. 5	PTO Reimbursement Request (Union)
Attachment	New No. 6	Admin Building Controls and Access
Attachment	New No. 7	Work From Home Tracking Sheet Added

[illegible]

## REVISION SUMMARY NO. 4 (June 5, 2020 – August 28, 2020)

[illegible]



# PANDEMIC GUIDANCE DOCUMENT

## REVISION SUMMARY NO. 5 (August 28, 2020 – January 15, 2021)

SECTION	ITEM NO.	DESCRIPTION
Preface	-	New – added to provide clarity on purpose and dynamic status of the document
S1	No. 2	Clarified and supplemented mask benefits
S1	No. 4	Added clarity that discussion with manager was before returning to work
S1	No. 6	Expanded components of Community programs restricting behaviors
S1	No. 6.b	Refined exposure definition
S1	No. 6.c	Refined clarity on manager communication
S1	No. 7	Added clarity for hand washing
S1	No. 8	Added readiness clarity for changing conditions
S1	No. 9	Clean and replace masks as required
S1	No. 11	Re-written to clarify mask requirements
S1	No. 12	Supplemental info for mask requirements outdoors
S1	No. 13	Clarified mask hygiene
S1	No. 14 New	Reinforced local jurisdictional requirements
S1	No. 15 New	Supplemental guidance for N95 masks
S2	No. 14	Refined expectation under HIPAA
S2	No. 15.d	Add local travel advisory review
S2	No. 16	Expanded temperature self-screening and the use of portable electronic equipment
S2	No. 19	Modified Summer Readiness to Operational Readiness
S2	No. 24	Clarified Admin Building expectations
S2	No. 25 New	Supplemental details on the use of trailers to keep Admin building isolated
S2	No. 26 - 32	Renumbered, formerly No. 25 – No. 31
S2	No. 26.f New	Added cleaning requirements after shelter in place
S2	No. 31	Clarified elevator requirements
S3	New	Enhanced guidance for PM/GM Accountability
Section	4 - 19	Formerly Section No. 3 to No. 18
S5	No. 1	Added note for replacement letters for new shelter in place requirements
S5	No. 7	Added options to plant morning meetings
S6	No. 4 New	Expanded trailer requirements to keep contractors out of Admin Building
S6	No. 5 New	Added requirements for portable facilities
S6	No. 6 - 13	Renumbered, formerly No. 4 to No. 11
S6	No. 6.e	Expanded options for LOTO location
S6	No. 6.g	Limit number of personnel at LOTO station
S6	No. 8	Clarified options for contractor orientation
S6	No. 10	Add virtual visits as options to vendor site visits
S6	No. 11	Expanded delivery options outside the fence
S6	No. 12	Added details on Contractor temperature screening

**PANDEMIC GUIDANCE DOCUMENT**
**REVISION SUMMARY NO. 5 (August 28, 2020 – January 15, 2021)**

<b>SECTION</b>	<b>ITEM NO.</b>	<b>DESCRIPTION</b>
S6	No. 13.a	Clarified that all contractors shall be screened
S6	No. 13.c	Clarified that the more restrictive COVID program details apply (Contractor and Calpine)
S6	No. 14.b.i New	Clarified masks are required when performing temperature screening
S6	No. 14.b.ii-b.x	Formerly No. 14.b.i – b.ix
S6	No. 14.c.i	Clarified Contractor notices prior to mobilizations
S6	No. 14.c.iii	Staggered start times for additional activities
S6	No. 16.a	Clarified exposure criteria
S7	No. 1	Clarified travel is business travel, not personal travel
S7	No. 2	Clarified visitor requirements
S8	No. 1	Clarified that trailers would only be considered under a sequestration event
S8	No. 2	Clarified limitations for electrical connections
S9	No. 1	Clarified Sequestration readiness expectations
S9	No. 2	Clarified Sequestration – confirmation of support equipment
S10	No. 4	Provided actions to acquire sleeping quarters
S13	No. 3	Revise strategy if new sequestration obligations occur
S14	No. 2	Revised bullet to bring to current standards
S14	No. 4	Added mask requirement
S14	No. 6	Refined requirements to wear mask outside your office
S14	No. 10	Updated mask requirements
S14	No. 11 New	Added note on benefits of proper mask fit
S14	No. 12 - 14	Formerly No. 11 through No. 13
S15	All	Re-written to reference a specific series of links that can be used to confirm local jurisdictional requirements. Since situations keep evolving, rather than memorialize it a reference sheet has been added
S16	Intro	Added info to introduction for OSHA Updates
S17	New	Add a vaccine section
S18	Renumbered	Formerly Section 16
S19	Renumbered	Formerly Section 17
Attachment	No. 1	Revised to capture current practices or new standards
Attachment	No. 6	Revised to capture current practices or new standards
Attachment	No. 10	Revised to capture current practices or new standards
Attachment	No. 13	Revised to capture current practices or new standards
Attachment	No. 15	Revised to capture current practices or new standards
Attachment	No. 16	Revised to capture current practices or new standards
Attachment	No. 17	Revised to capture current practices or new standards
Attachment	No. 19	Revised to capture current practices or new standards
Attachment	NO. 20	Revised to capture current practices or new standards
Attachment	NO. 21	Revised to include all states/counties where Calpine operates

**PANDEMIC GUIDANCE DOCUMENT**

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# **PANDEMIC GUIDANCE DOCUMENT**

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## LIST OF ATTACHMENTS

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**PANDEMIC GUIDANCE DOCUMENT**

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## PANDEMIC GUIDANCE DOCUMENT

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### Purpose

The purpose of this document is to collect the multiple communications and guidance that have been distributed into one package for clarification and use. The document will be updated from time to time to include best practices, community impacts, jurisdictional requirements at the county, state, or federal level, or other requirements that are invoked by the ISO's or by NERC for the Bulk Electric System reliability for Generator Operators.

The guidance in the document applies to all of Calpine Power Generation facilities including the Geysers and to the Gas Operational Personnel. Please remember that we cannot deviate from our value system. Our obligations, in order of priority, is to keep our personnel safe, protect the environment, and preserve our equipment. We need to observe each other and ensure that we are all taking adequate steps to keep each other safe and healthy

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## PANDEMIC GUIDANCE DOCUMENT

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### PREFACE

Federal and State OSHA inspectors have the right to audit your locations and request information regarding your Pandemic Guidance and to confirm that Calpine's programs are compliant.

The Calpine document is a comprehensive guide that meets or exceeds all OSHA requirements. As changes occur or more restrictive requirements are identified, this manual will be revised.

In addition, many counties have local posting requirements that are coordinated with the HRBP and more specifically, the Calpine EHS team.

All Calpine sites need to have a hard copy of this guidance document available for review in the event of an audit.

The leadership teams at each facility are expected to be familiar with the content of this document and constantly reinforce the expectations with their teams.

If at any time there are known deficiencies or conflicts with local requirements, please contact your RVP or Department VP as may be required.

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## **PANDEMIC GUIDANCE DOCUMENT**

### **SECTION 1: EMPLOYEE WELFARE**

1. Your safety and the safety of your teams are of utmost importance. Please take the necessary steps to stay focused and take the time necessary to work safely.
2. Stay safe. The most effective method of protection from infected/exposed individuals remains social distancing, wearing a mask, and frequently washing your hands. The best information available is that COVID-19 enters the human body through the face (eyes, nose, and mouth). Infection most commonly occurs through the air (from respiratory or speech droplets) which is what makes social distancing so critical, and by touching your hands to exposed surfaces and then touching your hands to your face, (which is why the recommendation is to frequently wash your hands), and through the air (from respiratory or speech droplets), (which is what makes social distancing is so critical.).
3. Monitor the physical condition of those on your team and observe any changes in physical capabilities or health.
4. If for some reason you travel on PTO, shift breaks, or on a weekend, and feel that you have been exposed, are exhibiting any influenza symptoms, or traveled to restricted areas, please let your Manager or Supervisor know before returning to work.
5. At the start of each shift, in a private location, each employee is requested to check their temperature. If your temperature is at or above 100.4°F or 38°C or other reading as designated by local jurisdiction (following the thermometer instructions when taking the measurement), please continue to practice social distancing and immediately contact your manager or the first available manager at your facility **[NOTE: FOR OTAY MESA OR CPN PIPE LINE TEAM MEMBERS WORKING IN SAN DIEGO COUNTY, THE THRESHOLD TEMPERATURE IS 100.0°F.]**
6. As required, each employee is requested to honor their community's shelter in place requirements, social restrictions, curfews, travel restrictions, or any other control measures put in position. By minimizing exposures and refraining from community interaction, the chances of being exposed are mitigated. If you do need to go out or interact with contracted maintenance staff, please take all necessary precautions that includes social distancing, washing your hands frequently, avoid contact with surfaces or other elements that increase exposure, and adhere to all community guidance for face masks (if applicable). If you do have to travel on PTO, shift breaks, or time off of work, please let your Manager know if you would have to answer yes to any of the following;
  - a. Conducted personal travel in the past 14 days to a location outside your work or residence state or county that has jurisdictional travel restrictions or inside or outside the US?
  - b. Have you knowingly been in close contact (within 6 feet for 15 minutes or more over a 24 hour period) with someone who has tested positive for COVID-19?
  - c. Have you tested and been found positive for COVID-19 and not received clearance to return to work by your supervisor or HR Business Partner? Please maintain communication with your manager and/or your HRBP.

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- d. Are you currently experiencing influenza-like symptoms such as fever, cough, and shortness of breath?
- 7. Please use great care when you are away from work to wear a mask, wash your hands, and watch your distance to protect your health and the health of your family. As we do with many of our safety practices, carry them home to decrease the potential for risk. As our communities open up, please remain vigilant and keep yourselves safe.
- 8. For those employees who take medications, please monitor your prescription levels and make sure adequate time is allotted to allow for refills. Pandemic conditions can change rapidly and it is best if all individuals are well prepared for any scenario.
- 9. Remember to clean your PPE at the start of each shift and as required during your shifts. Masks shall be replaced as required or washed frequently to optimize the effectiveness.
- 10. For Detailed mask guidance, please refer to **Attachment 1**
- 11. Employees are requested to wear a mask at all time when on site. Employees are required to wear a mask inside all buildings at all times except when in your own office, in a conference room, or work area (including the Control Room) where six (6) feet or more of separation can be achieved. In these situations, the area should be disinfected prior to use and when you leave the area for any reason. Employees are also permitted to remove their masks at meal time but shall follow the same guidelines for sanitizing the area before and after use and shall ensure the proper physical separation is achieved.
- 12. When outdoors, Employees shall wear a mask during the execution of their daily routines or assigned tasks when in the presence of others (Calpine and non-Calpine personnel). even if social distancing criteria of 6 feet or greater can be achieved. It is strongly recommended that each employee continued to wear their mask to maximize their protection when on site.

Each individual is requested to be guarded in their approach and use good judgement in protecting their health. Employees may wear homemade cloth masks made from bandanas, scarfs, or other optional sources.

- 13. Masks are only effective if properly worn. Please be sure that your mask covers your mouth and nose and fits snugly on the side of your face. Good hygiene should be reinforced whenever placing or removing your mask. Only handle your mask by the ear loops or straps to ensure cleanliness.
- 14. If there is a local jurisdictional obligation by local or state jurisdictional authorities that exceed the Calpine requirements, the more stringent obligations shall be met. .
- 15. For your added protection, N95 masks are available for your use and are available for times when 6 foot social distancing requirements cannot be achieved. A supply of N95 masks is available at each facility so if elected for use, please maintain your mask appropriately. .

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***Caution: The use of masks is not a substitute for washing your hands and the continuation of social distancing. In addition, care must be taken when wearing masks. If the mask requires constant adjustment or repositioning on your face, extreme care should be used when touching your hands to your face.***

16. Employees that choose to wear their own face coverings are permitted to utilize creativity in your mask design, but please be cognizant to comply with the Aspire values and be mindful of Calpine's diverse workplace when choosing your mask. To be respectful to the people around us, neutral mask designs are most appropriate in the workplace. Mask designs shall not include political and/or offensive insignia or profanity. If you have a question about what is appropriate in the workplace, please contact your manager and/or HR Business Partner.
17. Other Pre-cautions when wearing masks;
  - a. A non-cloth face mask may be reused as long as it maintains its structural integrity and the filter material is not damaged or contaminated with any substance. Please use great care after daily use, to dry masks and preserve them using hair dryers, some other hot air blowers, or other means of sterilization based on the type of mask and store in a plastic bag until the next time you are required to wear the mask.
  - b. If you are wearing cloth masks, please keep the masks clean so as not to exposure yourself to other contaminants. Wash and clean the cloth masks as required.
  - c. Please follow all proper protocols for donning and removing your mask using care not to cause an exposure. Wash your hands before and after the process.
  - d. Raise awareness and keep your PPE sterile and clean. Wash your safety glasses with hot water and soap for 20 seconds like your hands, especially after social distancing is not able to be maintained.
  - e. Use care and raise awareness not to lay your mask on common surfaces.
  - f. Use sterile wipes to clean the inside/outside of your hard hat. Use care if you remove your mask and store it in your hard hat during breaks and meal periods. Be sure to wipe out your hard hat before and after this process. Please sustain a high level of awareness.

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## SECTION 2: MANAGER'S GUIDANCE

1. Form for Employee reporting health concerns or symptoms to Manager; See **Attachment 2** (Reporting Form for Management Receiving Contact from Employee) is provided for use. In addition, user's instructions are provided as **Attachment 3**. (Steps to be taken in Response to an Employee reporting COVID-19 Infection, Symptoms, or Exposure)

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2. There are no modifications to our leave policy at this time. If an individual is required to be quarantined by a doctor, government agency, due to travel, or for any other cause, the individual will need to coordinate their return to work after quarantine with their manager and HRBP. For those employees that have to take off for more than 40 hours, a process is in place that will allow the employee to request restoration of up to eighty (80) hours of PTO. The first forty (40) hours of PTO is not eligible for restoration. During the process, windows will be announced and the HRBP for the region will reach out to those fall into this category. Application forms are included as **Attachment 4 and 5** for non-union and union plants. Each case will be reviewed on its own merits. Please be sure to counsel all employees not to put themselves in harm's way and to protect their personal health.
3. Some states may have required supplemental sick leave programs and Calpine will comply with them as applicable. Please see your HRBP for further information.
4. All visitors to your plants must be scheduled and business essential. The PM shall review any request for plant visits and confirm the work is essential to your needs. The RVP's are available to consult and discuss any concerns. All visitors (non-Calpine employees) shall complete the COVID-19 Visitor Questionnaire.
  - a. For Calpine employees that are visitors, please ensure that they have performed the temperature screening upon their arrival to the site. Please provide temperature measuring device for use if the employee is not equipped.
  - b. Access to the Administration Building and Control Room shall be restricted. See **Attachment 6** for specific guidance.
5. Use of the PTO policy specific to the approval of unscheduled PTO remains unchanged. PTO can be denied if there is a business essential need.
6. Option for Selling PTO. Recognizing several families across our employee base may experience financial hardships during the COVID-19 pandemic, management has approved the ability for employees to sell up to 40 hours of PTO, pending the demonstration of economic hardship (subject to prescribed submission deadlines). Employees wishing to exercise this option can contact their Manager and email Human Resources at [REDACTED] using the attached **form**. See Attachment 7.
7. Donating PTO. Often during challenging times, Calpine employees have rallied to support one another through the donation of PTO hours. At this time, there are not clear needs for PTO donation. However, if and as such needs arise, we will communicate accordingly.
8. PTO Accrual Limits. If you or your team members reach / exceed the PTO accrual limit as a result of being asked to not take PTO, please contact your Manager. Your circumstance will be reviewed on an exception-only basis with your line management.

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9. To minimize exposure for those employed at a generating asset, the PM and RVP can decide if an employee can work from home on a full or part time basis. This includes EHS support personnel. There is no minimum requirement here and based on activities at the plant (i.e. Spring Outages, Forced outages, etc.) an individual's status may change. Employees that work from home are requested to complete a Work From Home tracking sheet provided as **Attachment 8**.
10. There will be no special pay codes issued for those working from home. The key phrase is "Working." All individuals that are relieved from physically reporting to the work site on a daily basis are expected to be working during the core work hours.
11. For high risk individuals, as defined by the CDC, if the employee elects to self-quarantine, PTO must be used.
12. In the event of a sequestration, if an employee is required to continue to work and there is no opportunity to take PTO (employee actually had a PTO request denied by the supervisor) AND the Employee will not be able to collect earned PTO, on a case by case basis up to 40 hours PTO will be added to the individual's PTO bank. To meet this criteria and to receive this benefit, the PM must receive approval by the RVP and consult with the SVP of the designated approval. (We need to track this on a weekly basis.) Approval is required each time there is a break in the work hours.
13. Plants are required to maintain the check list (**See Attachment 9**) and continuously monitor the requirements
14. Please remember to follow all HIPAA requirements. If there is any doubt, reach out to your HRBP. This includes sharing names and medical updates on all personnel.
15. Only Business Essential Travel will be approved;
  - a. Individuals requesting travel should review with their PM and subsequently with the RVP to define the essential business need for travel.
  - b. All travel must be approved by SVP of Operations (PM or RVP to review with SVP)
  - c. Outside organizations visiting plants must coordinate with plant management prior to visiting the plants.
  - d. Employees who travel on personal business should use their discretion to minimize exposure and notify plant management of non-work related travel. Caution is advised to monitor local jurisdictional and state requirements before traveling outside your county or to other states to ensure compliance with quarantine expectations.
16. The Management team needs to continuously monitor cleaning supply inventories and coordinate with suppliers and SCS to retain adequate supplies on site. As required, supplies may need to be shared from plant to plant.
  - a. Plants shall provide detail mask inventory counts and provide updates as required/defined by your RVP to support lead times for replacements

## **PANDEMIC GUIDANCE DOCUMENT**

- b. Plants shall control non-contact thermometers and routinely check and confirm the proper operation of the devices.
  - c. Plants may also use portable electronic thermometers as an alternative to contact thermometers but this does not change the obligation for daily thermometer checks.
- 17. Monitor the activities of your cleaning crews and ensure that by their actions they are not going to contribute to exposure to your teams. Many plants have restricted access of their cleaning crews to non-essential areas to improve isolation of the plant staff. The right decision and coordination of the activities is a plant decision.
- 18. Use the COVID-19 cost codes at your plants for specific tasks and costs incurred implementing the precautionary measures and Sequestration readiness tasks. **Attachment 10** is provided as a cost template for your use.
- 19. Plants are to continue to execute all critical work at the plants for operational readiness to meet or obligations to NERC and the ISO where we operate. If you believe work is non-essential, review with your RVP.
- 20. Plant leadership teams are requested to continue to check the availability of scheduled craft support for planned outage work. Plants are also requested to be prepared to store material in the event conditions worsen. (This would include tarps, coatings, etc.)
- 21. Compensation and Conditions; If it is determined that a Sequestration of an individual plant is deemed to be required, the provisions of Calpine's "Inclement Weather and Natural Disaster Pay Policy," CPN-208 latest revision, will be applied.
- 22. Continuously monitor chemical levels and leave additional time to plan and schedule refills. If you have an option to store additional chemicals on site, be sure to review with your EHS representatives before increasing the quantities beyond the typical levels.
- 23. If you receive any Forced Majeure notices or major outages are cancelled or work is delayed by COVID-19, please work with your RVP and notify legal (Katherine Piper) on any risk or impact.
- 24. Please ensure that there are adequate portable facilities (porta-johns, wash stations, etc.) for individuals who are not part of the plant staff. Remember only key plant employees are permitted in the Administration building. Even the OS personnel shall be provided with isolated office areas.
- 25. Work trailers for OS and Engineering personnel shall be provide to keep the support teams out of the administration building. Each plant is requested contact the IT group to obtain copiers, printers, and phones so that the teams can stay efficient in the execution of their work scopes. In addition, efforts shall include adequate WI-FI booster equipment or hard wire connectivity to each trailer for use.
- 26. Muster / Plant Evacuation / Shelter in place considerations  
Plants that have anhydrous ammonia or are located in or near chemical plants or refineries are

## **PANDEMIC GUIDANCE DOCUMENT**

requested to review their muster plans and shelter in place requirements in the event of a hazardous chemical release requiring individuals to Shelter in Place. Each plant will need to determine the best path forward based on the plants configuration. Please consult with EHS and your RVP as required. The following steps are offered for consideration when developing the plans for your facility;

- a. Review muster locations and add signs for Social distancing as required
- b. If the Control Room was the plant's shelter in place requirement, please identify a new location where contractors and employees can be secure. This may be trailers or other locations.
- c. All contractors and employees shall don their mask as required
- d. Ensure there is an adequate communication plan
- e. Check wind sox condition and if area cannot be secured, move all personnel up wind from the release.
- f. Once the shelter event is concluded, please make plans to have the occupied areas cleaned and sanitized.

### **27. Supplies for Employee Use;**

Many employees have not been able to acquire critical supplies for implementing required hygiene at home. Accordingly, for plants that have adequate supplies and paper products, employees may request and receive products for personal use. This may include increasing the size of the plant orders as required to satisfy the request. The material taken for each employee's personal use should be tracked. A process for reimbursing the company will be provided following the COVID-19 Shelter in Place actions.

### **28. Common Area / Vending Machines;**

Each facility is to ensure that common areas are cleaned and wiped down before and after each use. Some tips for consideration. Please recognize that this is not an all-inclusive list.

- a. For coffee pots – please also keep cups and other common used items covered to ensure no one infects the area
- b. In lieu of bulk supplies of utensils, plants should buy pre-wrapped packages to ensure adherence to hygiene requirements.
- c. Vending machines – place a set of wipes near the vending machine for cleaning between uses
- d. Microwave ovens, stove tops, conventional ovens – be sure cooking areas are cleaned before and after each use.

### **29. Local Guidance: Local jurisdictions may require specific postings, obligations for wearing masks, enhanced social distancing requirements, etc. Each facility is expected to comply with these requests and ensure the expectations are communicated to your team members.**

### **30. For Calpine Temporary Employees: Contracted employees that are working in traditional Calpine roles (due to an approved leave) shall be requested to complete the Contractor Visitor / Contractor Questionnaire on a weekly basis and have their temperatures measured daily by a Calpine**

## PANDEMIC GUIDANCE DOCUMENT

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employee.

31. For administration buildings with elevators, the plant shall add a posting limiting the number of personnel that can be on an elevator based on its size and social distancing requirements. Even if adequate social distancing requirements of 6 feet or more can be met, maximum of 4 individuals shall be permitted. Masks must be worn at all times. Elevators that service administration buildings shall only be accessible to Calpine personnel or those specifically granted access under the provisions of **Attachment 6**.
  32. For California Plants Only (Break Times) – Clarifications for Shelter in Place and Uninterrupted Breaks Talking points;
    - a. During any Shelter in Place Order that may apply to your plant location, unless otherwise directed by their manager, each employee will continue to be relieved of all duty and control and allowed to take an uninterrupted 30-minute meal break. Please fill out your time sheet accordingly, unless business demands cause you not to take the uninterrupted break. In what should be the rare instance that occurs, as is standard practice, please provide an explanation in the notes section of the time sheet for management's review.
    - b. As you know, Calpine is considered an essential function employer as we produce power under the CISA guidelines. There are specific Shelter in Place guidelines both on State (Executive Order N-22-20) and County levels. The guidelines allow citizens whether at work or at home to perform the 'essential activities' of procuring food. Although it is not recommended to go out to lunch as the objective is to not cross 'cohorts', employees are not restrained from taking an unrestricted 30 minute break during which time they can go to a take-out food establishment, leave the facility, or just go outside, etc. while maintaining appropriate social distance and practicing other appropriate precautions. Thank you for your cooperation during these unprecedented times.
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### SECTION 3 – PM/GM ENHANCEMENTS / EXPECTATIONS

This section is intended to provide additional guidance for to PM/GM's for enhancements and expectations to prevent the spread of COVID-19 with their facility. Overall conformance of the protocols remains with the plant manager and his/her leadership team.

#### 1. Conformance

- a. It is required that the plant leadership team to strictly apply all requirements and conform to all guidelines for wearing masks, social distancing, hygienic measures, Admin building access, and shift turnover practices.
- b. Compliance with all of the Pandemic guidelines and protocols increases the burden on the plant operating teams and impacts everyone working at the plant. Please make sure that all of us are hold ourselves accountable and do our part to keep ourselves and all of our team



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members safe. Regardless of any relaxation of any Local health orders or ordinances in the regions you work, we need to remain vigilant in our compliance and conform to all requirements.

- c. Each PM/GM's is requested to review the level of conformity to the plant practices as compared to the guidelines. Where adjustments are required, the plant leadership team is to make the required changes. During this process, the PM/GM shall review in-plant isolation between management, operating, and maintenance teams to ensure if one group is affected it does not affect the other group. Even further, even within these plant departments, all efforts should be made to keep teams isolated even during lunch and break times. When direct contact is required, please use masks, socially distance, and reinforce hygienic measures.
- d. PM/GM shall review LOTO, Safe work, and JSA procedures and reinstitute the isolation procedures used during outages or a new and improved procedure.
- e. The PM/GM shall review and determine the employees that are non-essential (to be physically located at the plant) and can effectively execute their work assignments from home. For each plant, the RVP must approve the candidates.
- f. If elected by the PM/GM and approved by the RVP based on local conditions, the PM/GM can develop a functional rotation of plant management and leadership teams on site. When not on site, the managers shall be working from home.
- g. The PM/GM's may develop alternate work schedules for maintenance staff. All plans must allow for the continued execution of all planned and required work scopes to sustain plant reliability and comply with applicable wage, hour and meal/break regulations.
- h. The requirements implemented in all of the protocols, procedures and guidelines are minimum requirements. Each plant is requested to discuss any deviations or enhancements with your RVP.

### 2. Deep Cleanings and Enhanced Cleanings

- a. To support contact tracing and identify areas to be cleaned, "The Power Plant Reporting form for Management Receiving Contact from Employees" regarding exposures or symptoms has been modified to include the following questions;
  - i. Symptoms experienced at work
  - ii. Specific locations at work the person has been for the last 72 hours
  - iii. Did the employee wear a mask per the requirements during his/her time on site
  - iv. Has the employee worked within six (6) feet of any other employees? If yes, describe the PPE that was worn.
  - v. Where did the employee take lunch and break?

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- vi. What rest rooms were used while on site?
- b. Using the available information, the following defines the next steps;
  - i. Determine / confirm where the individual has been working since his/her exposure or 3 days if he/she is showing symptoms (if Mechanic or Tech, tape areas around the individuals tools. If there is a community toolbox, use gloves and wipe down all tools.)
  - ii. Sanitize all work areas that the employee could have been in contact with since the exposure or over the past 3 days if he/she is showing symptoms.
  - iii. Interview employees who may have been in close contact with the employee (closer than 6 feet) since the exposure over the prior three (3) days if employee is showing symptoms. Based on any exhibited symptoms or circumstances for the contacted individuals, further isolation and communications may be required.
  - iv. Conduct deep cleaning of areas. Note that initial cleanings may be required by on site staff for critical areas such as the control room.
- 3. Plant and Employee Testing
  - a. If an employee tests positive and was working at the plant, the contact tracing will be used to identify employees that were in contact with the infected individual for 72 hours (3 days) prior to the employee showing symptoms and determine if there was an exposure. (Greater than 15 minutes in a 24 hour period with a protocol breakdown.)
  - b. Based on the contact tracing, employees in the contact group are expected to continue to work and conform to all protocols for wearing masks, socially distancing, and hygienic measures. In the event someone on the list has failed to follow the protocols while in the presence of the individual that tested positive, then an additional review and independent assessment may apply.
  - c. If a person in the contact group develops COVID and tests positive, the contact tracing will be conducted and additional COVID-19 testing will be required. The same provisions identified on item 2 will continue to apply.
  - d. If at any time a third person at the plant is confirmed positive during any fourteen day period, all plant personnel will be tested for COVID-19 on a mandatory basis. The same provisions identified on item 2 will continue to apply. In states with specific OSHA requirements, those testing requirements as it relates to an "outbreak" will be followed.

NOTE: Testing will be arranged and scheduled by the HR team. Testing will be PCR type which has proven to be the most reliable. Caution must be used and assuming no one else tests positive, it does not mean that protocols and guidelines can be relaxed.

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### 4. Emergency Procedures

If significant number of employees are infected on a shift, especially in operations, staffing alternatives may be required. Since each plant staff and qualifications are different, there is not a single prescriptive guideline that can be created and the RVP will be required to work through staffing options and alternatives with their PM/GM. Since the cycle for the virus is typically 14 days, the impact should not be a long term problem. If this does occur, we will work to get additional testing for individual that are symptom free for 72 hours (without the use of fever reducing medication) to allow them to return to work.

In extreme measures, and only on a case by case basis, with EVP approval, an employee that is asymptomatic may be able to work with the use of an N-95 mask and specific requirements defined by the CDC.

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## SECTION 4: SAFE PASSAGE TO/FROM WORK: Access Letters

1. Calpine Employees: Each employee shall be in receipt of an access letter for use in travelling to and from work. Some deviations may apply based on your region, state, or local requirements. These letters are issued and signed by HR for use. Employees requiring replacement letters shall contact their manager or HRBP.
  2. Temporary Worker/Independent Contractors (contingent workforce): This refers to temporary workers and/or independent contractors on assignment for us and employed by an employment agency (e.g., a temporary ICE Tech III from NAES). **See Attachment 11.**
  3. Shop Services, Contractors, Vendors or Other 3<sup>rd</sup> Party Service: This refers to the many various vendors you may have that provide services or deliveries to the facility. The plant management staff can use the attached template titled "Shop Services or Other Third Party Service Access in the Event of Shelter in Place" to provide these letters locally and in real-time 1.) if you want to list the individual names and 2.) for a shop to stay open to support outage work. **(See Attachment 12)**
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### SECTION 5: SHIFT TURNOVER – HYGEINE AND ISOLATION

1. The outgoing shift should wipe down the control room
  2. The incoming shift should remain isolated from the outgoing shift by staying in an isolated location.
  3. All details and shift turn over shall be by phone and using the logs. A dedicated conference room or some other area should be used. It will need to be wiped prior to use by the incoming shift and also wiped down when use is completed.
  4. Individuals that turn over in labs or other areas shall follow the same procedures.
  5. Incoming shifts shall wipe down control rooms and all incoming areas.
  6. Repeat at each shift turnover.
  7. To the extent possible, plant meetings should be conducted in smaller groups or separated as much as possible. This includes morning tailgates and maintenance meetings. It is acceptable to do meetings by phone or in larger shop areas to keep everyone isolated. The Control Room should not be used for these meetings.
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### SECTION 6: CONTRACTOR ENGAGEMENT / INTERFACE

1. All Contractors and visitors shall complete the COVID-19 Visitor Questionnaire prior to entering the site. The PM is authorized to restrict access to the plant for any questions answered in the affirmative during the survey. Visitor Questionnaire is provided in English and Spanish as **Attachment 13 and Attachment 14**. (These attachments have been refreshed to align with current CDC Guidelines) The only exemption for contractors completing this questionnaire apply to GE and Siemens staff that have been pre-approved not to complete the questionnaire and is managed by Outage Services. If anyone requests an exemption, please reach out to your RVP.
2. During Outage work, please keep distance from all contract personnel or others that are on site directing work. The control room shall be restricted access at all times and only required Calpine plant personnel shall be admitted on an as needed basis.
3. Plants are required to take the necessary precautions to isolate the plant work force from the contracted work force by setting up dedicated area for LOTO, breaks, and lunch rooms. Plants may, to support this effort, rent additional trailers and work spaces to execute this objective. If elected, plants are authorized to charge the Pandemic Cost codes developed for each plant.

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4. Work trailers for 3<sup>rd</sup> Party and OEM personnel shall be provide to keep the contracted workforces out of the administration building. In addition, efforts shall be made to include adequate WI-FI booster equipment or hard wire connectivity to each trailer for use.
5. Please ensure that there are adequate portable facilities (porta-johns, wash stations, etc.) for individuals who are not part of the plant staff. Remember only key plant employees are permitted in the Administration building.
6. LOTO Discussion
  - a. Minimize interaction in close proximity
  - b. Maximize use of satellite lock boxes
  - c. Plant should consider placing lock on Master LOTO box
  - d. Personnel will continue to be required to personally sign onto LOTO documents
  - e. Establish separate LOTO area outside control room preferably outside admin building (Such as a dedicated trailer, specially prepared area in the store room or shop, or an out building in your plant.
  - f. Use gloves and other PPE to ensure minimum contact.
  - g. Only one individual shall be serviced at a time. All others need to stand back and retain 6 feet of physical distance from the desk and from each other. If a trailer is used, only one person should be in the trailer at a time.
7. Safe work and hot work permits shall be developed and issued using similar methods to the LOTO permits.
8. Set up separate areas for contractor orientation. Work with the IT group to set up screens or other necessary equipment to allow for proper orientation.
9. Isolate all contractors from Admin building. Only plant staff should be permitted in Admin building unless specifically approved by the Plant Manager. In all cases, plant personnel shall meet or exceed all incremental steps for social distancing, hand washing and other best practices. Anyone given exception by the PM to be in the building must stay away from all staff and shall not enter the Control Room during the visit. See **Attachment 6** for more specific guidelines.
10. No live/in-person (in plant) sales calls shall be allowed. All visits by representatives should be virtual.
11. Review all purchase orders and where there is an option, work to restrict/reduce delivery hours at the plant. Set up receiving areas at or near the fence to prevent entry. Specially prepared areas using tents or job boxes shall be considered. Any questions or concerns shall be presented to the RVP.

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### 12. Contractor / Visitor Temperature Gate Screening Exceptions

Temperature screenings shall be performed on all contractors and visitors entering the plant gate.

The following exceptions apply;

- a. Calpine employees (who are not part of the plant staff) shall be provided with a portable thermometer to measure their own temperature in private. The same restrictions / guidance outlined in Section 1, Item 5 of this document shall apply.
- b. FEDX and UPS deliveries should be either received at the gate or provisions shall be made to drop the deliveries in an isolated location in the plant. No direct engagement shall occur without the Calpine employee taking all necessary steps to protect their health. All PPE shall be worn and strict conformance to all protocols should be followed.
- c. For all other 3<sup>rd</sup> party screenings at the gate, See Article 13 below when gate for screening and muster area requirements.

### 13. The configuration and provisions for temperature screening will vary from plant to plant based on your plant configuration. Each facility shall develop a specific plan that keeps the individual taking the measurement safe and healthy. Separate procedures may be implemented for post outage screenings or when minimal contractors are on site. The following shall apply;

- a. RVP and Plant Manager shall meet and establish a time frame to implement the screening at their facility, when screenings are ceased following the outage, and how post outage screenings will occur. Regardless of the tasks being performed, all contractors shall be screened.
- b. Prior to any implementation of screening at your facility, if there is an outage scheduled that involves Outage Services or Engineering contractors, please have the PM reach out to the following Calpine personnel as it applies to the outage scope at your facility;
  - i. Chris German; to allow for advance notification of any OS contractors on site. (as required)
  - ii. Bill Valagura; to allow for advance notification of any Engineer contractors on site (as required)
  - iii. Bonnie Schwartz; the EHS specialist will work with the PM to determine how best to support the process
- c. Prior to the start of the outage, each facility shall have a plant representative reach out to all BOP contractors and/or other service providers at the plant to notify their home office or representative for the work being done at the site.
  - i. If not received to date, each contracted organization shall provide their COVID-19 policy to the plant. The more restrictive requirements will apply.
  - ii. Please share the details of how the screening will occur
  - iii. Please provide details regarding the questionnaire
  - iv. Set expectations for Safe Work and LOTO requirement for implementation and closeout

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### 14. Guidance for Contractor and Visitor Temperature Screenings – Refer to **Attachment 15** and **Attachment 16** for San Diego County

#### a. Recommended Use

- i. Follow the instructions on the specific device provided at your plant. Since we are ordering the devices from multiple sources, the exact directions may change for your device.
- ii. Generally, the non-contact thermometers should be used 1.5-2.5 inches from the temple of the person being tested. If equipped with a laser, the laser should be turned off. The measurement should take 1 – 2 seconds.

#### b. Contractor and Visitor Temperature Measurements Protocols;

- i. Masks are required to be worn by all personnel.
- ii. For Use when major repairs or outage work is ongoing (>15 Contractors):  
Establish a location at or outside the plant gate to measure the contractor or visitor temperature on the person's temple. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the person taking the measurements healthy and safe.
- iii. For Use when minor repairs or maintenance work is ongoing (<15 Contractors):  
Establish a location at the muster point to measure the contractor or visitor's temperature on the person's temple. The muster area must not be in the admin building. Each plant shall have flexibility in the configuration of its testing area and shall at all times implement all hygienic procedures and precautions necessary to keep the contractors, visitors and the person taking the measurements healthy and safe.
- iv. Follow the measuring instructions and the distance requirements defined by the thermometer OEM.
- v. The measurement should be taken by a trained individual. It does not have to be someone medically trained, just someone trained on the use of the device. This could be a Security Guard or plant staff member assigned by plant leadership.
- vi. No readings should be written down.
- vii. Anyone with a temperature that measures at or above 100.4°F (or other threshold reading as directed by local jurisdiction) should be requested to step aside while the line is cleared. Please treat the individual with dignity and respect. Remember you are taking skin temperature so ambient air temperature or other forms of exertion on the body can raise or lower the individuals skin temperature. In lieu of measuring the actual temperature to protect individuals, an alternative may be to set an alarm

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point at 100.4°F (or other threshold reading as directed by local jurisdiction).

***[NOTE: FOR OTAY MESA OR CPN PIPE LINE TEAM MEMBERS WORKING IN SAN DIEGO COUNTY, THE THRESHOLD TEMPERATURE IS 100.0°F.]***

- viii. For any person measured at 100.4°F (or other threshold reading as directed by local jurisdiction) or greater, please repeat the test after the line is cleared and at least 5 minutes have elapsed since the first temperature reading was taken. If the person is still shown to have a fever, please ask the individual to remain outside the gate, contact the individual's supervisor or manager and the plant manager or designee. Please honor all social distancing requirements and mask requirements. The Plant Manager or their designee should meet with the contractor's manager or supervisor and explain why the individual cannot report to work or visit the plant. The PM or designee should review the return to work policy of the contractor and seek guidance from the RVP and HRBP. ***[NOTE: FOR OTAY MESA OR CPN PIPE LINE TEAM MEMBERS WORKING IN SAN DIEGO COUNTY, THE THRESHOLD TEMPERATURE IS 100.0°F.]***
- ix. If a person refuses to have their temperature measured, please ask the individual to step aside and have his/her manager or supervisor come to the gate. Contractors and visitors who do not have their temperatures taken cannot enter the plant.
- x. The person taking the contractor and visitor's temperatures shall wear a mask and gloves being sure not to touch their face. The person shall decontaminate themselves and the area of the measurement location using appropriate wipes or sprays. In addition, the person taking the measurements should wear a face mask and other PPE as required.

### c. Other Considerations

- i. Prior to any contractor mobilizing for an outage, each plant shall reach out to their outage contractors and discuss the requirements being placed into effect to improve safety. If the contractor representative has any concerns, please contact your RVP and follow up discussion with legal and HR will be contacted. This should include all aspects of the protocols and working conditions at the site.
- ii. For outages where Calpine Outage Services and/or Calpine Engineering will have contractors on site, please ensure the respective Calpine point of contact has reached out to their counterparties "prior" to coming on to site to notify of them of the temperature screening requirement (as required).
- iii. For larger outages, stagger the start times of your contracted work force so as not to cause a line at the gate, safe work permits sign off, or LOTO's. Be sure that all parties are wearing masks and practicing social distancing by all workers.



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- iv. Post additional signage at the gate/testing area to stand a minimum of 6 feet from the person next to you to ensure social distancing obligations are met.
15. In the event that a contractor or visitor were to have a temperature at or above 100.4°F (38°C) (or other threshold reading as directed by local jurisdiction), the following steps are recommended;
- a. Review the COVID-19 program of the employer of the individual that has a temperature reading above 100.4°F (38°C) (or other threshold reading as directed by local jurisdiction). Once the details are known, please review with your HRBP and RVP and implement the more restrictive guidelines.
  - b. If the individual is an OS or Engineering contractor, please reach out to your OS rep or Engineering Rep on site for action and review. Please have the individual follow the same steps in implementing the more restrictive requirements.
16. Each Contractor Superintendent and foreman shall be reviewing, on at least a daily basis but the ongoing daily health of their work crews. Just as Calpine does with the employee self-reporting expectations, the contracted employees should be encouraged by their leadership team survey their health.

Sample survey questions are offered below.

- a. Have you knowingly been in close contact (within 6 feet for 15 minutes or more over a 24 hour period) with someone who has tested positive for COVID-19?
  - b. Have you tested and been found positive for COVID-19 and not provided your medical release to return to work to your HR Business Partner?
  - c. Are you currently experiencing influenza-like symptoms such as fever, cough, and shortness of breath?
15. In the event a Contractor reports of developing symptoms, had confirmed contact with someone suspected of having COVID-19, or has tested positive for COVID-19, please work with the contractor supervisor and complete the form provided as **Attachment 15**.

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## SECTION 7: ESSENTIAL TRAVEL / PLANT VISITS

- 1. Anyone needing to travel for business purposes should submit the request to the PM and RVP prior to travelling.
- 2. Outside organizations visiting plants must coordinate with plant management prior to visiting the plants. For a visit to be approved, there must be an essential business need for access. All provisions for temperature screening, access to Admin and Control room, and proximity to individuals shall be reviewed. If deemed necessary, Visitor shall also be requested to wear a mask at all times, complete

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the visitor questionnaire, and have their temperature measured before entering the site. (Calpine employees do not need to complete the questionnaire but should NOT enter the site if there were any suspected exposures or has any COVID 19 symptoms.)

3. All travel requires SVP final approval (PM or RVP coordinate approval with SVP)
  4. Employees who travel on personal business should use their discretion to minimize exposure and notify plant management of non-work related travel as prescribed in Section 1, Item 6 of this document.
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## **SECTION 8: TRAILER / RV SET UPS AND PRECAUTIONS**

1. In the event of a sequestration event; Employees, after getting agreement from the Plant Manager, can bring a personally owned RV to the site. In the event of a sequestration, the employee will have the ability to receive \$50 per day of personal use and \$75/day if other employees share the RV.
2. To be eligible for site use, there must be adequate electrical hook ups for each trailer. The PM will need to determine the quantity of hooks up obtainable for each site.
3. Upon arrival, RV's and all rental trailers must be sanitized
4. Locate in area that adequately drains and graded to avoid the collection of water.
5. Where possible, locate at least 200 feet from cooling tower or storm water ponds.
6. Locate as far as practical from hazardous processes (NH3 storage tanks, hazardous host processes, chemical storage tanks, hazardous noise, compressed gas storage, flammable liquids/gasses).
7. Secure trailers against high winds, earthquakes etc. in accordance with local code. Trailer assembly personnel should execute this task as part of the installation.
8. Consider establishing designated smoking areas well away from sleeping quarters.
9. Develop an Emergency Response plan for the trailers (EHS personnel will assist)
  - a. Means to alert personnel
  - b. Reinforce muster location if different than plant's typical muster location
  - c. Ensure areas are secure and protected
10. Management teams shall determine locations, where social distancing requirements can be met, where employees can decompress from working their shifts. Enhancements can include TV, laptops,

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or other activities desirable for your location. To support this process, hot spots have been distributed by the IT teams to each plant location.

### SECTION 9: SEQUESTRATION READINESS (When Directed)

1. Each facility is expected to have the infrastructure (connections and plants) to sequester but at this time there are no plans to implement this sequestration plan. Sequestration would be the course of last resort and would be on a plant by plant basis and not a global mandate. There are three (3) conditions where sequestration would be considered;
  - a. Federal mandate from NERC or the local ISO that a plant serves
  - b. State mandated sequestration
  - c. If COVID-19 cases near a plant increased to a level where it was felt employees were safer being sequestered.
2. Preparations for Sequestration, upon a release, shall include, at a minimum, the following requirements;
  - a. Freezers and/or refrigerators capacity to allow for bulk storage of food. A minimum of a two (2) week supply should be on hand
  - b. Maintain an adequate supply of paper products for an extended stay. (Plastic utensils, serving spoons, paper cups, plates, etc.)
  - c. At a minimum, have an excess supply of toiletries, soap, shampoo, sanitizing equipment, rags and buckets, and other essential home goods.
3. Please have washers and dryers installed so personnel can wash their clothes if an extended stay is required. Remember shift isolation and wipe down of the washer and dryer is required before and after each use. If your uniform suppliers or local businesses are capable of providing services, plants are authorized to use these services as an alternative. .
4. If a sequestration plan is activated for your facility, plants are requested to work with the Calpine sourcing teams to acquire living quarters.
5. Please follow the guidance for setting up RV's in the prior sections. In addition, in the event of a sequestration event, remember we will still need to keep shift teams isolated from each other even under a sequestration. When laying out the requirements, please give ample consideration for locations where employees can decompress after their shifts, call home, watch TV, have access to the internet, etc.

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6. If plants prefer cots or sleeping bags, and you can adequately isolate the shifts, each person should have their own sleeping equipment.
7. Plants are authorized to go out and purchase sheets, blankets, sleeping bags or other essentials for meeting the provisions for sequestration.
8. Compensation and Conditions; If it is determined that a Sequestration of an individual plant is deemed to be required, the provisions of Calpine's "Inclement Weather and Natural Disaster Pay Policy," CPN-208 latest revision, will be applied.
9. Make preparations for ordering food for the plant using remote access. It is recommended that each plant conduct trials on ordering food through the identified options to ensure there are no issues. Details are provided in **Attachment 18**.

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### **SECTION 10: SEQUESTRATION SHIFTS**

*NOTE: Geysers staffing configuration may not align with this methodology.*

1. Calpine is proposing, if we do have to sequester due to conditions, a 7 day on and 7 day off proposal. We have developed guidance for full plant sequestration for longer periods but full testing and screening are recommended before implementation. As information changes, updates will be provided.
2. At this time, any sequestration would be on a plant by plant basis, not regional or national. (pending any governmental mandates)
3. Preferred Sequestration (If Required); 7 Days On / 7 Days Off
  - a. Most plants have 4 shifts that man the plant that rotate on a DuPont schedule.
  - b. Shifts will be designated as A, B, C, and D. Shifts A and B would work the site actively with A shift on days and B shift on nights.
  - c. Shift C & D, will be sent home and paid for their normal scheduled shift hours. Accordingly, in exchange for compensation, the employee would be required to Shelter in Place.
  - d. As is currently configured, each shift will remain isolated from the other shifts on site. All procedures currently in place for wiping down work areas will be in effect.
  - e. On Day 8, the A and B shifts will complete the 7 day shift and the C and D shift will report for duty with C shift on days and D shift on nights.

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- f. On Day 15, the process repeats except B shift is on days and A shift is on nights.
  - g. On Day 23, the process repeats with D shift on days and C shift on nights
  - h. Patterns continue until Sequestration is cancelled.
  - i. Maintenance staff would be split
  - j. Plant Manager would work with A & B Shift, line managers will work with C&D shift.
- 4. No sequestration would be implemented while contractors are on site.
  - 5. If a plant were to have a forced outage during a Sequestration event and the plant staff could not correct the issue (Such as a tube leak), a case by case review would be performed. Special provisions including specific isolation requirement's for personnel would be defined and supplemental protocols enforced as required.
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### **SECTION 11: FATIGUE AND MORAL**

- 1. The duration of the pandemic has impacted the moral of the plants. Isolation has resulted in a loss of camaraderie and companionship achieved from problem solving through collaboration. Successful operations is achieved through team work and a certain element is lost when teams are forced to stay separated. We must also recognize the risk that this isolation, the impact of the protocols, and the resultant stress and fatigue creates a potential safety risk.
  - 2. Unfortunately, the current uncertainty will continue to test our will and our endurance. Challenges will evolve, be unique and persistent. We will need to continuously adapt, collaborate, and remain innovative in our mission in keeping our teams safe and healthy.
  - 3. Sustaining the moral of each plant will not be easy and there is not one solution that will universally work. It is suggested that we openly discuss this with our plant leadership teams and start to build some best practices about how some plants are addressing this and what we can do to counter these impacts. (ie: Plant suggestions include group lunches honoring social distance and hygienic protocols)
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### **SECTION 12: CHEMICAL AND OTHER PLANT DELIVERIES**

- 1. **Attachment 19** was developed by the EHS team to provide additional recommendation and guidance when taking deliveries. Specifically, the document is intended to provide guidance on methods Calpine sites may use to limit exposure of employees to COVID-19 during the delivery of

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materials, chemicals, and equipment to the sites. This guidance is not intended to replace existing Standards, but to provide sites with options to evaluate and implement where it makes sense to do so.

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### SECTION 13: OTHER DEPARTMENT ACTIVITIES

1. The SCS / Procurement teams will facilitate with any special needs for trailers, chemicals, or cleaning supplies. Please feel free to reach out directly to him with any requests.
2. OS/Engineering is continuing to support the fleet. Any changes in outage support or work being executed by Engineering will be reported as soon as details are available.
3. The SCS team will arrange for William Scotsman or other viable suppliers to supply and configure trailers for use as sleeping quarters and lounges if required for a sequestration event.
4. IT Support – as needed including hardware request for hot spots and configuration of equipment.
  - a. establish universal support for computer services (work from home requirements for critical personnel
  - b. Priority One phone service / Satellite phones
  - c. Maintain helpdesk and support infrastructure (hardware and software)
5. HR –
  - a. National letters for Critical Infrastructure Access: Establish protocols for essential personnel transit
  - b. Implement HIPAA requirements when tracking employee health status
  - c. Guide employee interface and check points to include coordinating return to work clearance
6. BCMT continues with overall administration of all groups and facilities
7. Regulatory Teams
  - a. Actively engage with ISO's to monitor changing requirements and provide required updates
  - b. Monitor local restrictions and requirements
  - c. Monitor all NERC, FERC, and other state guidance for distribution and implementation

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### SECTION 14: NON-ESSENTIAL WORKER RETURN TO WORK ORIENTATION (See Attachment 20)

#### **GUIDANCE**

The following needs to be reviewed by all employees returning to the Plant;

1. Your safety and the safety of your teams are of utmost importance. Please take the necessary steps to stay focused and take the time necessary to work safely.
2. Stay safe. The most effective method of protection from infected/exposed individuals remains social distancing, wearing your masks, and frequently washing your hands. Infection most commonly occurs through the air (from respiratory or speech droplets) which is what makes social distancing and wearing a mask so critical. Transmission can also occur to a lesser degree by touching your hands to exposed surfaces and then touching your hands to your face, which is why the recommendation is to frequently wash your hands and keep your hands away from your mask. .
3. At the start of each shift, in a private location, each employee is requested to check their temperature. If your temperature is at or above 100.4°F or 38°C F or other threshold reading as directed by local jurisdiction (following the thermometer instructions when taking the measurement), please continue to practice social distancing and immediately contact your manager or the first available manager at your facility. ***[NOTE: FOR OTAY MESA OR CPN PIPE LINE TEAM MEMBERS WORKING IN SAN DIEGO COUNTY, THE THRESHOLD TEMPERATURE IS 100.0°F.]***
4. Each employee is requested to honor their community's shelter in place requirements. By minimizing exposures and refraining from community interaction, the chances of being exposed are mitigated. If you do need to go out or interact with contracted staff, take all necessary precautions of social distancing, wearing your mask, wash your hands frequently, avoid contact with surfaces or other elements that increase exposure. If you do have to travel on PTO, shift breaks, or time off of work, please let your Manager know if you would have to answer yes to any of the following;
  - a. Conducted personal travel in the past 14 days to a location outside your work or residence state or county that has jurisdictional travel restrictions or outside the US?
  - b. Have you knowingly been in close contact (within 6 feet for 15 minutes or more) with someone who has tested positive for COVID-19?
  - c. Have you tested and been found positive for COVID-19 and not received clearance to return to work by your supervisor or HR Business Partner?
  - d. Are you currently experiencing influenza-like symptoms such as fever, cough, and shortness of breath?
5. Remember to clean your work station at the start of your shift, and the end of your shift, and during the day if others have been in contact with your work area.

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6. Do not leave your office without wearing a mask. Do not enter anyone else's office or conference rooms without the ability to maintain the social distancing requirements (even if wearing a mask).
7. Please stay out of the control room without specific approval from the PM/GM.
8. When in common areas, be sure to wipe down before and after each use. (This includes vending machines, coffee pots, microwave ovens, stove tops, etc.)
9. Remember to clean your PPE at the start of each shift and as required during your shifts.
10. Employees are required to wear a mask inside all buildings (except when you are alone in your own office), whenever social distancing requirement cannot be met indoors or outdoors, or as directed by local, state, or federal jurisdictional requirements. . This includes during the execution of daily routines at the plant when in the presence of others (Calpine and non-Calpine personnel). Even if social distancing criteria of 6 feet or greater can be achieved, it is strongly recommended that each employee wear their mask to maximize their protection.

Each individual is requested to be guarded in their approach and use good judgement in protecting their health. Employees may wear homemade cloth masks made from bandanas, scarfs, or other optional sources.

11. Masks are only effective if properly worn. Please be sure that your mask covers your mouth and nose and fits snugly on the side of your face. Good hygiene should be reinforced whenever placing or removing your mask. Only handle your mask by the ear loops or straps to ensure cleanliness.
12. If your community requires mandatory masks while outside buildings, please be sure to comply with the local requirements.
13. For your added protection, N95 masks are available for your use when 6 foot social distancing requirements cannot be achieved..

***Caution: The use of masks is not a substitute for washing your hands and the continuation of social distancing. In addition, care must be taken when wearing masks. If the mask requires constant adjustment or repositioning on your face, extreme care should be used when touching your hands to your face.***

14. Other Pre-cautions when wearing masks;
  - g. A non-cloth face mask may be reused as long as it maintains its structural integrity and the filter material is not damaged, or contaminated with any substance. Please use great care after daily use, to dry masks and preserve them using hair dryers, some other hot air blowers, or other means of sterilization based on the type of mask and store in a plastic bag until the next time you are required to wear the mask.



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**PANDEMIC GUIDANCE DOCUMENT**

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- h. If you are wearing cloth masks, please keep the masks clean so as not to expose yourself to other contaminants. Wash and clean the cloth masks as required.
  - i. Please follow all proper protocols for donning and removing your mask using care not to cause an exposure. Wash your hands before and after the process.
  - j. Raise awareness and keep your PPE sterile and clean. Wash your safety glasses with hot water and soap for 20 seconds like your hands, especially after social distancing is not able to be maintained.
  - k. Use care and raise awareness not to lay your mask on common surfaces.
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**SECTION 15: FEDERAL, STATE AND LOCAL PANDEMIC REQUIREMENTS AND TRAVEL RESTRICTIONS**

From time to time, local jurisdictions will provide specific guidance for COVID-19 requirements including and not limited to testing, posting and mask requirements. The restriction and guidance evolve over time. It is critical that each region work with the Government & Regulatory Affairs team members, the region HRBP, and legal teams to ensure we comply with all local jurisdictions. The RVP's will support and manage this process.

Due to the dynamic situation, **Attachment 21** has been developed to identify reference appropriate links by state and county to check on a routine basis for site leadership teams to review and reset expectations for their specific work location or prior to travel to other Calpine locations. As required, this list will be updated from time to time and transmitted separately in lieu of updating this document.

This does not include other obligations for OSHA or local OSHA organizations for your state. These will be covered separately.

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**SECTION 16: OSHA Guidance**

OSHA has continuously refreshed its guidance on expectations for workplace safety as the CDC and other resources have updated guidance for the COVID-19 virus. Calpine's EHS team consistently reviews this guidance to ensure that our internal guidance is current and meets or exceeds expectations.

Further, as specific State OSHA organizations identify supplemental requirements, a review is also completed by the EHS team, Power Ops team, HR, and legal as may be required to ensure we are current. Supplemental actions, as was the requirement for the Hermiston plant in Oregon, with regards to posters and internal pandemic reviews by the plant staff, will be led by the EHS team.

## **PANDEMIC GUIDANCE DOCUMENT**

Note: For reference, the EHS team reviewed compliance for Hermiston and reported all requirements have been met.

Similarly, CAL OSHA had also developed supplemental requirements that have been reviewed and it was determined that no further action was required.

Although there are a number of checks and balances to ensure conformance to all OSHA regulations specific to COVID-19, the most important aspect is that our teams are aware of the expectations and that we hold our team accountable for guidance compliance.

### **The following supplemental information is offered;**

#### **1. OSHA Annual Training**

Due to COVID-19 concerns, OSHA will allow deferment of required annual training, audits, reviews, and assessments. To meet the threshold, plant staff, working with the EHS counterparts, must show that a good faith effort was made to have the annual training performed. For training, the EHS courses offered in Calpine's ABSORB Learning Management System meet the threshold for good faith effort.

The documentation can take many forms but should include the inability to get services or considerations for exposing critical essential staff. The VP of EHS and the region RVP will need to confirm the threshold for good faith efforts are being met.

Specific guidance for the "good faith effort" is defined in the following link and is also provided in **Attachment 22** for reference;

<https://www.osha.gov/memos/2020-04-16/discretion-enforcement-when-considering-employers-good-faith-efforts-during>

#### **2. OSHA Update – May 19, 2020. OSHA issued a "Interim Enforcement Response Plan for Coronavirus Disease 2019" News release (Please refer to **Attachment 23**). The entire action is provided with the link below (Totals 26 pages);**

<https://www.osha.gov/memos/2020-05-19/updated-interim-enforcement-response-plan>

- a. OSHA is ratcheting up compliance on health care industry and further on its classification of job duties.
- b. OSHA is pushing forth with opening field visits
- c. OSHA now has standards responses and expectations for investigating claims of work place issues for safe working practice
- d. If a COVID 19 event occurs at your site, and a correlation is drawn that the virus spread in the workplace, these must be reported.