

Decision-Making Process for Plan Activation

When a tropical storm threatens the United States, the BC Manager and/or BCMT Chairperson will monitor the situation and communicate with both the BCMT and BCSC using available contact methods (voice, emails, etc.) to inform team members of a pending event.

High Level Process for Plan Activation

The following process will apply to activating the plan and the actions are in the order shown:

- The BCMT chairperson convenes a meeting of the BCSC, where the decision is made to activate the plan
- If the BCMT chairperson is unable to convene a meeting with all members of the BCSC in a timely manner, then any member of the BCSC may make the decision to activate the plan
- If all members of the BCSC are unavailable, the BCMT chairperson may, at his discretion, activate the plan

Once the decision is made to activate the plan as described above, the BCMT Chairperson (or alternate) will initiate the activation process.

The decision to activate Calpine's Hurricane Plan is based on the following factors:

Factors

Proximity and projected path of the storm:

- All Calpine locations potentially in the path of a tropical storm are considered.

Expected strength of the storm including the expected potential for damage and destruction:

- Estimated impact to Calpine offices, surrounding areas, and city / municipal infrastructure components.

Localized information that may accelerate Calpine's response:

Evacuation of low-lying areas in the path of a storm, as well as other local circumstances, may affect Calpine's plan activation.

Alert Levels and Criteria

Calpine has established three alert levels, **Standby**, **Emergency**, and **RTNO**, to guide the BCMT, the BCSC, as well as Wave Responders and other employees.

- ➔ Based on the proximity (typically 5 - 6 days to landfall) and projected path of the storm, the BCMT will recommend a **Standby** alert level.
 - ① If Houston is expected to be impacted, Wave 1a, followed by Wave 1b, will be deployed to CyrusOne in Austin
- ➔ Based on the proximity (typically 3 – 4 days to landfall), strength, and projected path of the storm, the BCMT will recommend an **Emergency** alert level.
 - ① If Houston is expected to be impacted, Wave 2 will be deployed to CyrusOne in Austin
- ➔ Based on the proximity (typically 1 - 2 days to landfall), strength, and projected path of the storm, the BCMT will recommend Office Closure.
 - ① If Houston is expected to be impacted, Wave 3 will be deployed to CyrusOne in Austin
- ➔ Based on weather forecast changes (e.g., the storm weakens and/or the projected path changes) the BCMT Chairperson (or Alternate) may recommend an alert level status change to **RTNO**.

Plan Activation Procedures

If the projected path and strength of the weather system has the potential to affect Calpine facilities, the BCMT Chairperson (or Alternate) will convene the BCMT and consider making a recommendation to the BCSC to declare the Standby alert level. The responsibilities of the BCMT are to:

- ➔ Discuss the potential impact of the situation on Calpine sites
- ➔ If applicable, recommend Standby level activation

The responsibility of the BCSC (or the BCMT chairperson, under the circumstances previously described) is to:

- ➔ Approve the plan activation (at Standby level)

The plan activation approval triggers the BCMT Chairperson (or Alternate) to notify all impacted BRP team leads, sites, departments, and functional areas.

The same process will apply to any subsequent change to the alert level (e.g., from **Standby** to **Emergency**, and to **RTNO**) as well as for office closures.

Ongoing Assessment

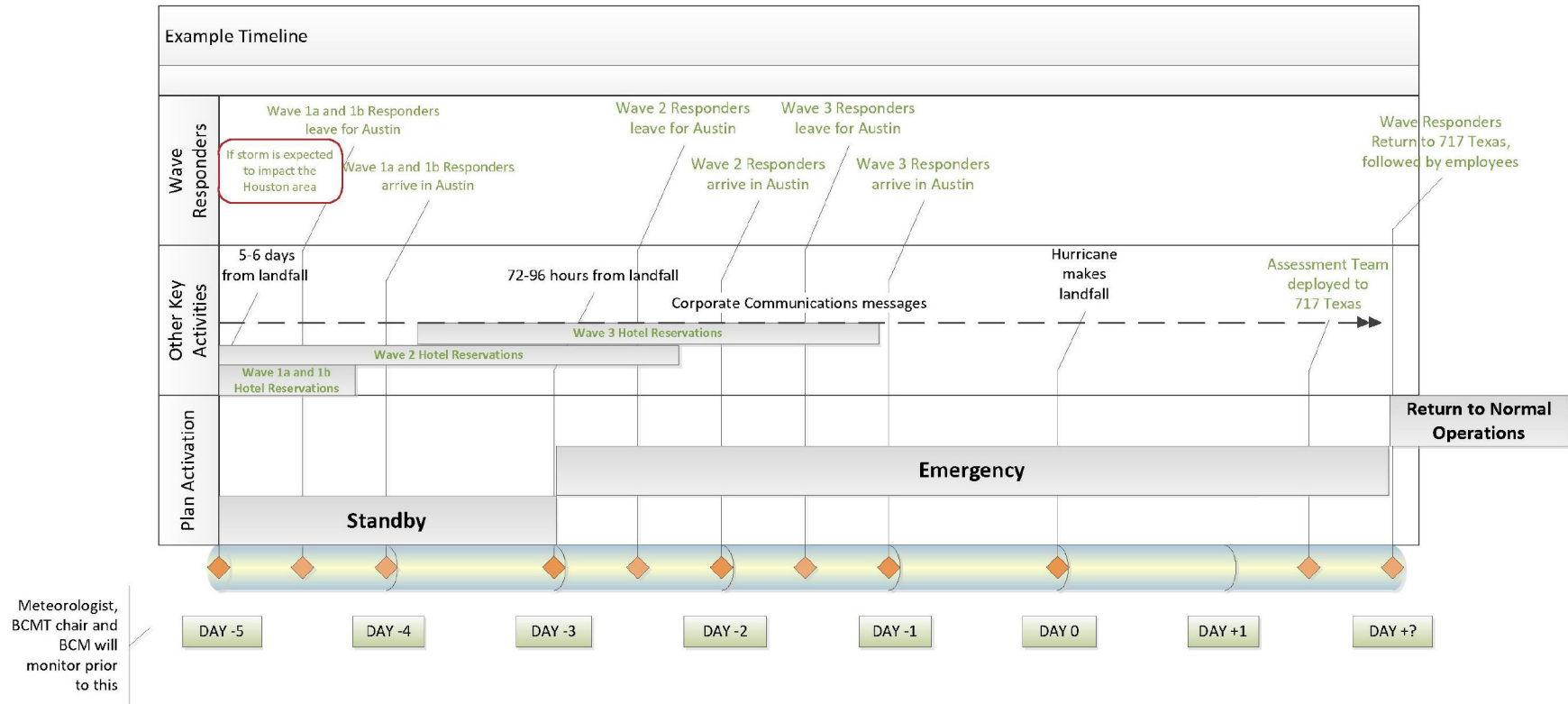
After the initial alert level is activated, members of the BCMT are required to conduct a daily BC Assessment Meeting to review the current situation. The

BCMT Chairperson is responsible for updating the BCSC as necessary. During an Emergency alert, the BC Assessment Meetings will at least daily and Management will decide whether to increase, continue with, or decrease the current emergency level.

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Example Timeline

Keep in mind that storm timelines can vary greatly and the timeline may be significantly compressed in some cases.



Communication

Content and Approvals

In accordance with the Corporate Communications policy, Corporate Communications will draft all emergency messages for the BCMT Chairperson's review and approval.

Notifying Employees

Once an alert level is determined, emergency communication message(s) will be released alerting employees of the situation.

The notification message(s) sent should match the current alert level announced (**Standby**, **Emergency**, or **RTNO**). Corporate Communications will customize standard email and voicemail emergency notification messages (per level) for hurricanes.

Frequency

Any change to the alert level requires a standard notification message within two hours after approval. If no changes result from a BC Assessment Meeting, no notification message is required, but one may still be sent if deemed necessary.

Method

- ➔ **Standby** alert level messages will be sent via Calpine voicemail and/or email
- ➔ **Emergency** alert level messages will be sent using the Emergency Notification System (MIR3) in addition to Calpine voicemail and/or email
- ➔ **RTNO** alert level, messages will be sent using the Emergency Notification System (MIR3) in addition to Calpine voicemail and/or email
- ➔ Calpine's employee hotline will supplement the above with a recorded message:

- [REDACTED]
- [REDACTED]

The following individuals have access to MIR3 and can process approved alert level messages for Corporate Communications:

Name	Work Phone	Mobile	Email
Seph Harris	[REDACTED]		
Heather Humalainen			
Rebecca Symmank			

Attempt to contact in the order listed.

Management Communications

All BC Assessment meetings should use the following dial-in number:

- [REDACTED]

Once the plan has been activated, the BCMT Chairperson (or alternate) will determine scheduling of the meetings and use of the bridge. BC Assessment meetings are to be concise and focus on the facts surrounding the current situation. A suggested agenda is included at the end of the plan.

Responsibilities and Tasks

Standby Actions

Type	Summary	Who	How	When
Surveillance	Monitor storm development and local activity	Meteorologist	Monitor meteorological sources	Ongoing
		BCMT chairperson, BC Manager	Monitor public resources and information provided by meteorologist	Ongoing
Continuity of Operations	Deploy Wave 1a if Houston expected to be impacted and prepare for Emergency level	BCMT, Plant Management	Participate in daily assessment calls and take actions as defined	As soon as plan is activated
	Deploy Wave 1b if Houston expected to be impacted and begin working	BCMT, Plant Management	Participate in daily assessment calls and take actions as defined	Between 1a and 2 Waves
	Prepare to go to CyrusOne Austin if your Wave is activated	Wave Responders	Continue to take laptops home nightly, ensure all work product accessible on network and prepare any critical hard copies for transport	As soon as plan is activated Deploy when required
	Prepare for possible office closure	Employees	Ensure all work product accessible on network and prepare any critical hard copies for transport	Ongoing
Employee Safety	Prepare home and family	Employees	Make safety preparations and an emergency kit	In advance of Emergency activation
Communication	Notify Wave Responders/employees of plan activation	Corporate Communications	Email/voicemail, hotline	Within 2 hours of activation

	All <i>affected</i> employees shut down all non-essential services and discontinue travel Provide reminder to Wave Responders/employees that laptops are to be updated via the network and taken home each night			
	Plan for Emergency level		Prepare and obtain approval of messages from the BCMT Chairperson or designee.	In advance of Emergency activation
	Stay informed	Employees	Monitor communications for instructions	Ongoing

Emergency Actions

Type	Summary	Who	How	When
Surveillance	Monitor storm development	Meteorologist	Monitor meteorological sources	Ongoing
		BCMT chairperson, BC Manager	Monitor public resources and information provided by meteorologist	Ongoing
Continuity of Operations	Wave Responders 2 deployed if Houston is expected to be impacted	BCMT, Plant Management	Participate in daily assessment calls and take actions as defined	Ongoing
	Go to CyrusOne Austin when your Wave is activated	Wave Responders	Wave Responders 2 should arrive in Austin in time for their next shift	As soon as Emergency level is declared
			Wave Responders 3 should monitor communications for instructions on deployment. Continue to take laptops home nightly, ensure all work product accessible on network and prepare any critical hard copies for transport	When required
	Prepare for possible office closure	Employees	Continue to take laptops home nightly, ensure all work product accessible on network and prepare any critical hard copies for transport	Ongoing
Employee Safety	Prepare home and family	Employees	Finalize home preparedness and/or evacuate, depending on location and civil authorities	When required
	Prepare for polling of employee status post-landfall	Corporate Communications, HR, BC Manager	Prepare messages on all available methods in case it is necessary to reach out to employees regarding their	As soon as Emergency level is declared

Type	Summary	Who	How	When
			safety, need for assistance, etc.	
Communication	Notify Wave Responders/employees of plan activation Wave 2 resources should prepare for imminent deployment	Corporate Communications	Email/voicemail, hotline	Within 2 hours of decision
	Plan for office closure		Obtain approval from the BCMT Chairperson or designee to send the approved messages.	In advance of office closure
	Stay informed	Employees	Monitor communications for instructions	Ongoing
	Poll employees	Corporate Communications, HR, BC Manager	Contact employees on all available methods regarding safety, need for assistance, etc.	Post-landfall if severe impact
	Increase awareness	HR, Corporate Communications, BC Manager	Communicate Employee Assistance Program (EAP) options, per diem policies and forms for Request for Emergency Vacation Cash Out, and Inclement Weather Natural Disaster Pay Policy,	When required

Return to Normal Actions

Type	Summary	Who	How	When
Assess impacted facility	Facility assessment			
		Director of Facilities, Building Manager	Assess impacted facility to ensure it is safe and fit for occupancy Upon determination that the building can be reoccupied, Calpine's Director of Facilities will update the BCMT	As soon as RTNO level is activated
Continuity of Operations	Wave Responders 1a returns to Houston Return to Houston when your Wave is activated	Wave Responders	Wave Responders 1a should arrive in Houston in time for their next shift	As soon as RTNO level is activated
			Wave Responders 1b should monitor communications for instructions on return. Ensure all work product accessible on network and prepare any critical hard copies for transport	When required
	Prepare for possible office reopen	Employees	Ensure all work product accessible on network and prepare any critical hard copies for transport	Ongoing
Communication	Notify Wave Responders/employees of RTNO alert level Wave 1b and 2 resources should prepare for imminent Return to Houston	BCMT, Corporate Communications	Email/voicemail, hotline Prepare and obtain approval of messages from the BCMT Chairperson or designee.	After receiving notification that impacted facility is safe to be occupied
	Plan for office reopen			In advance of office reopen

Type	Summary	Who	How	When
	Increase awareness	HR, Corporate Communications	Communicate Employee Assistance Program (EAP) options, policies and forms for Request for Emergency Vacation Cash Out, and Inclement Weather Natural Disaster Pay Policy	When required
		HR, BC Manager	Communicate Wave Responder per diem Form to Wave Responders	When required

Post Event Review

Upon completion of the **RTNO** process, a post event review will be conducted by the BCMT. Impacted BRPs will be updated based on knowledge gained and lessons learned to strengthen the overall Business Continuity Program. The Business Continuity Team will develop an incident and recommendations report for the BCSC and BCMT review.

Appendices

BC Assessment Meeting Agenda

This recommended agenda may be modified as needed. Note that not all agenda items will necessarily apply (e.g., CyrusOne may not be in use).

	WHO
Roll Call	BC Manager
Key Decisions	BCMT Chairperson
Status Reports	BCMT
Weather / Damage reports	HR, Meteorologist, Safety
Business Operations (all sites)	Commercial Operations, BCMT
Power Operations	Regional Operations
Houston and other office Accessibility Conditions	Facilities, HR
Communications (MIR3 statistics and conclusions), other communications updates	BC Manager, Corporate Communications
CyrusOne Operations	IS, BC Manager
Actions/Owners	BCMT Chairperson
Alert Level Update	BCMT Chairperson
BCSC Update	BCMT Chairperson
Next Communication Date	BC Manager

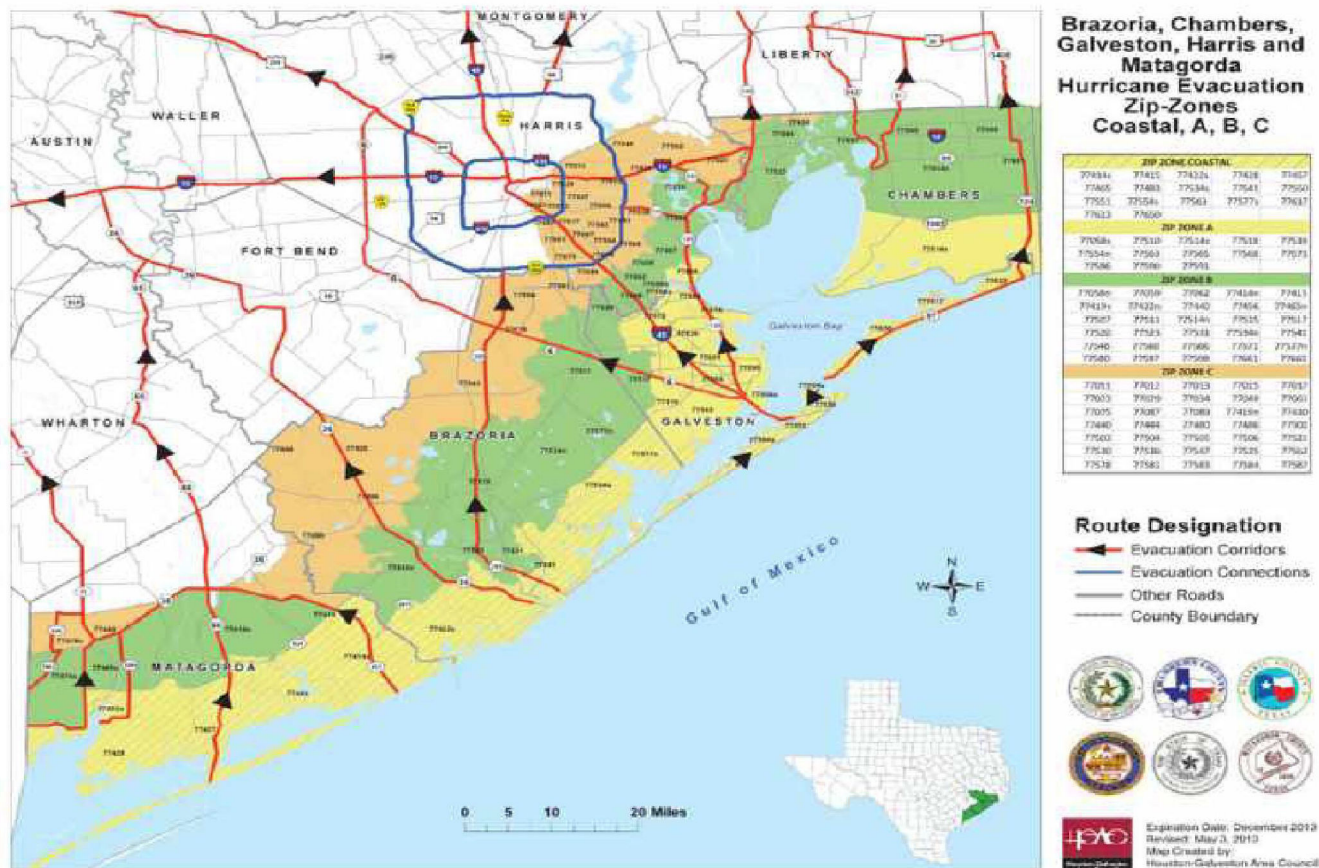
Resources

<http://www.srh.noaa.gov/hgx/>

<http://houston.emwin.org/>


<http://www.weather.com/>

<http://ready.gov/>



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Approval History

Change	Date	Approver	Approval
1.0	June 2012	Dennis Fishback	
Rev 1.1	May 2013	Dennis Fishback	
Rev 1.2	September 2013	Dennis Fishback	 FW Revised Hurricane and Pander
Rev 1.3	April 23, 2014	Dennis Fishback	
Rev 1.4	July 2014	Hether Benjamin-Brown	

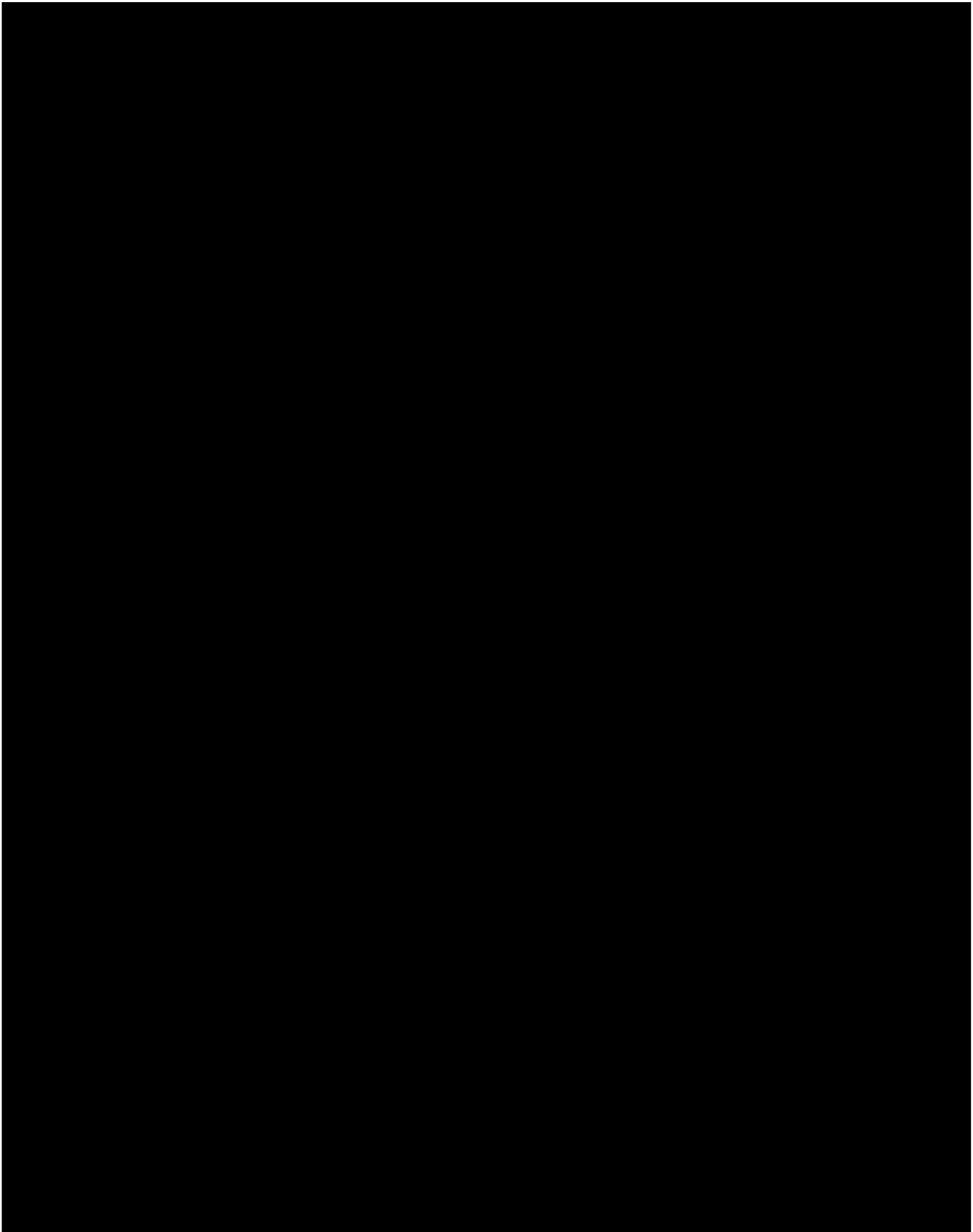
Annex 6 – Cyber Security Annex

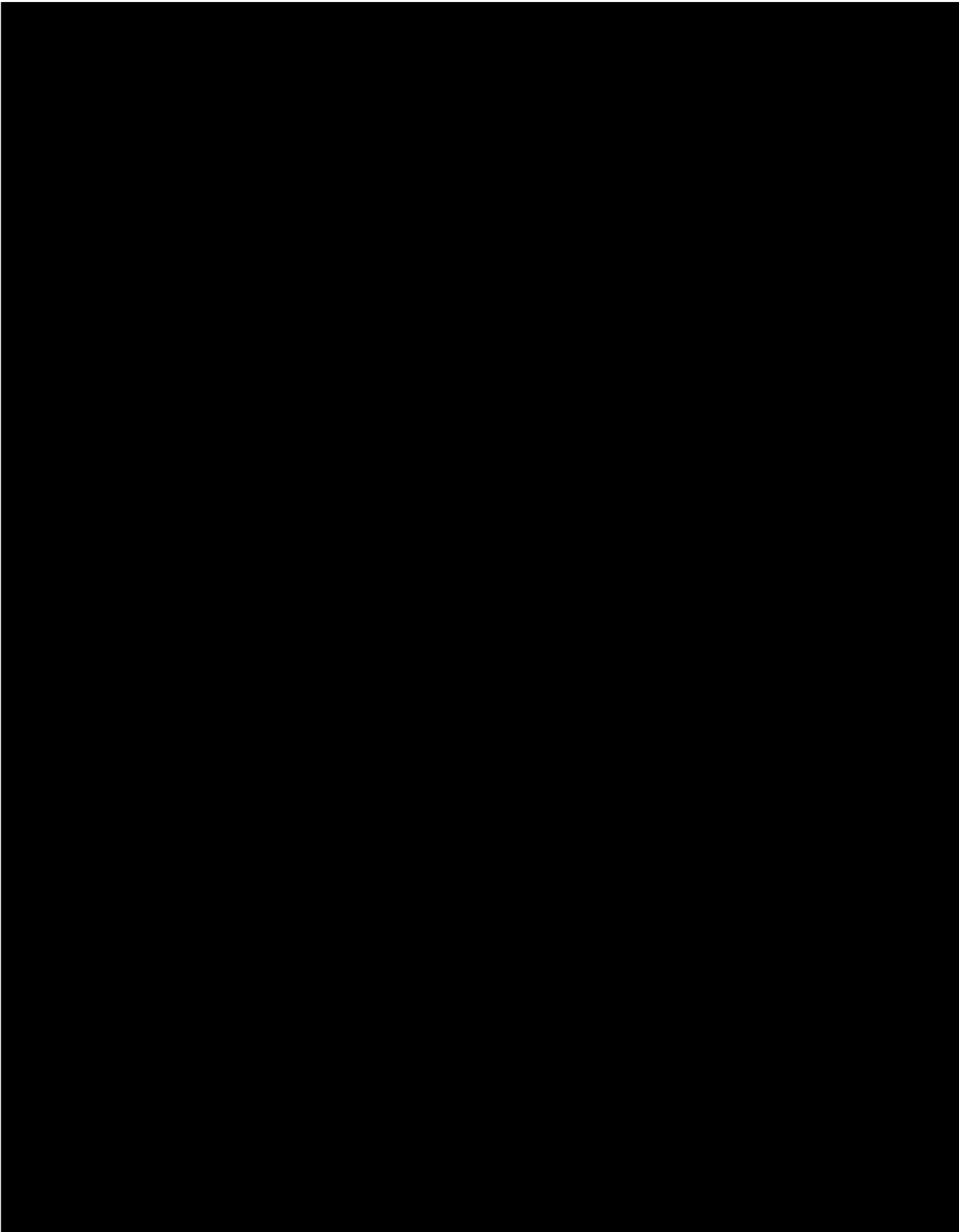
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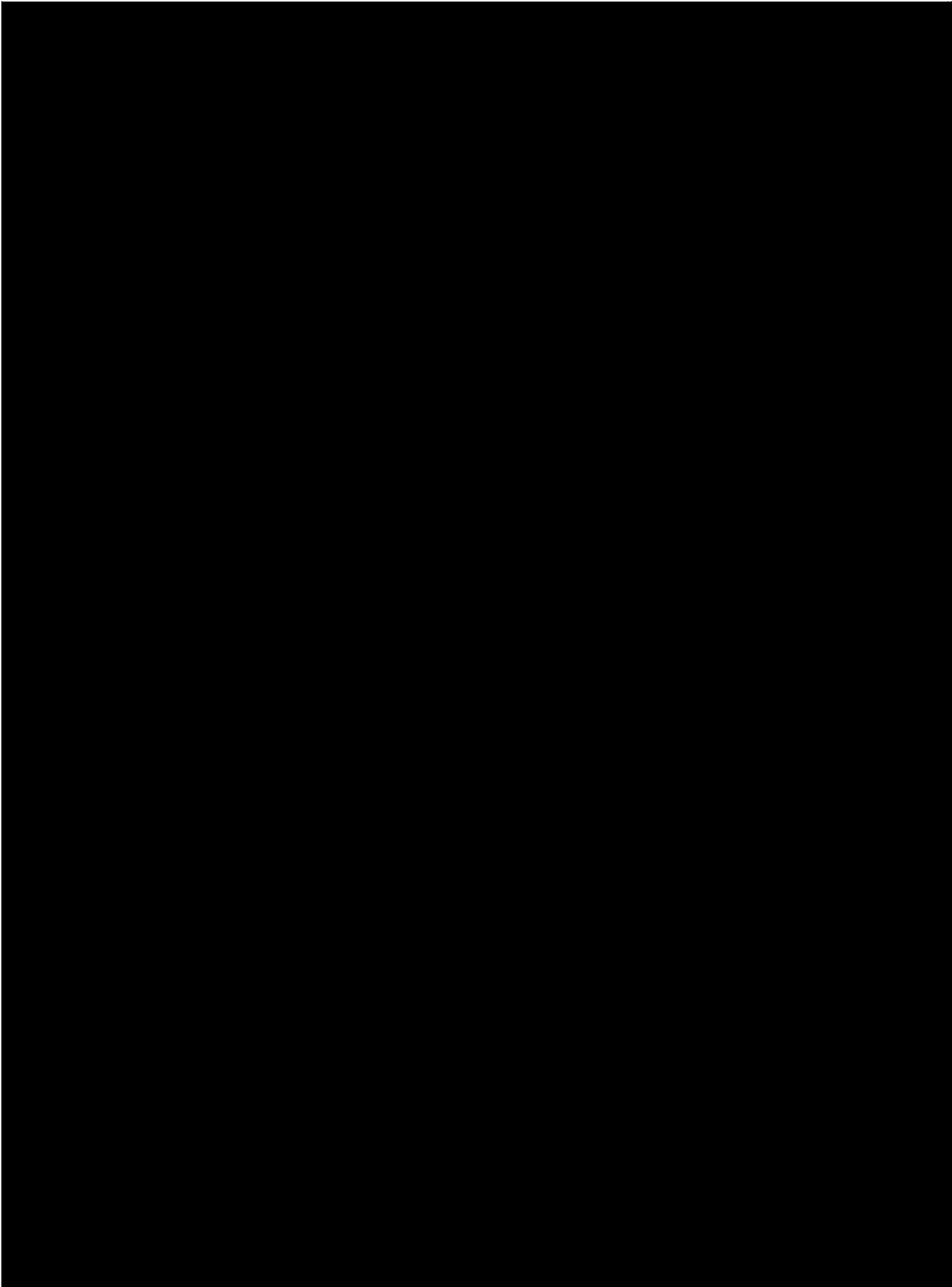
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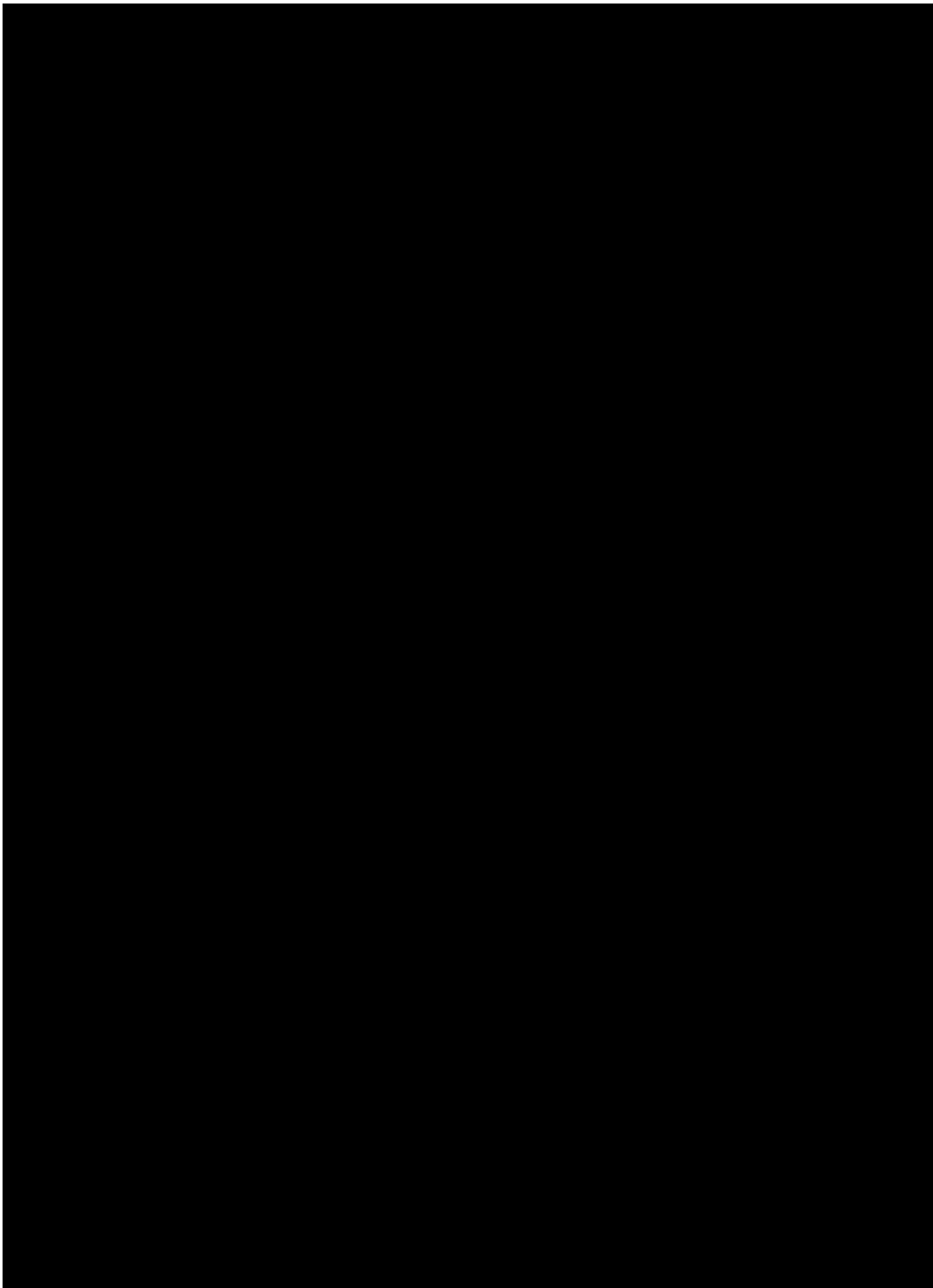
Calpine IT Cyber Security Incident Response Plan

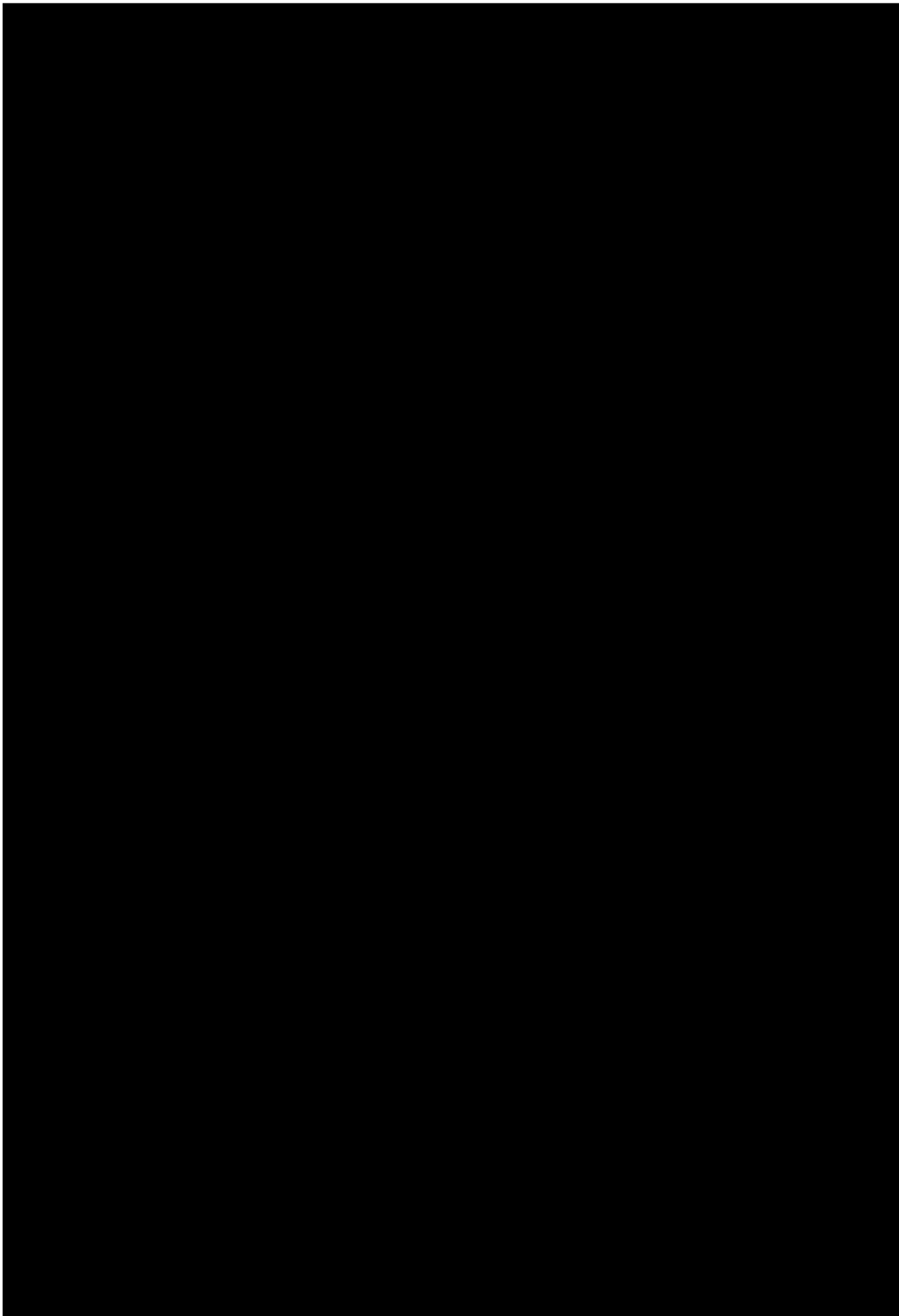
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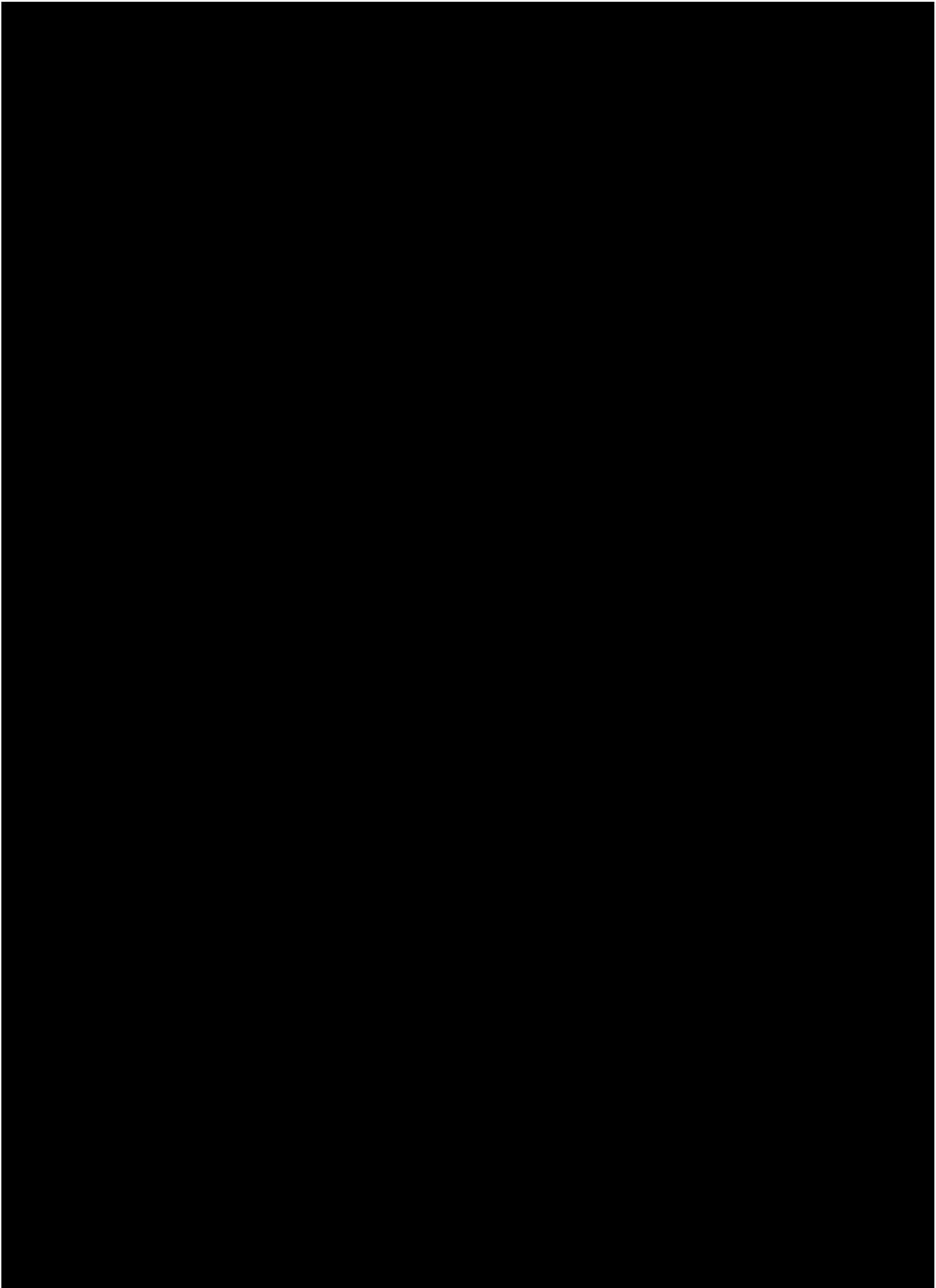












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Calpine Physical Security Operations Incident Handling Process

