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Engie Retail, LLC d/b/a Think Energy

**EMERGENCY
OPERATIONS PLAN**

Version No. 1.0

EXECUTIVE SUMMARY

I. INTRODUCTION

Engie Retail, LLC d/b/a Think Energy (“Think Energy”) submits this Emergency Operations Plan (“EOP”). The EOP sets forth Think Energy’s common operational functions that are relevant across emergency types and includes annexes that outline Think Energy’s response to specific types of emergencies. The objectives of the plan include to identify and document measures that will enable Think Energy to effectively respond to a disruptive event and restore critical business operations in a timely manner; document procedures to protect essential systems, applications, facilities, equipment, and other assets at the time of a disruption; facilitate effective decision-making to ensure that business operations are restored in a timely manner; enable effective communication and ensure quick and accurate dissemination of data; and ensure employee safety and security and minimize loss of life. This EOP is submitted to the Public Utility Commission of Texas (“Commission”) and to the Electric Reliability Council of Texas (“ERCOT”) in compliance with the requirements of 16 Tex. Admin. Code (“TAC”) § 25.53.

II. EMERGENCY CONTACTS

As required by 16 TAC § 25.53(c)(4)(B), Think Energy provides the below list of primary and backup contacts who can immediately address urgent requests and questions by the Commission:

Level of Contact	Name	Title	Email	Phone
Primary	Greg Laflar	Vice President of Operations and Digital	greg.laflar@engie.com	
Primary	J.D. Burrows	Vice President of Marketing and Customer Engagement	j.d.burrows@engie.com	
Backup	Sayun Sukduang	Vice President and Chief Supply Officer	sayun.sukduang@engie.com	
Backup	Ray Cunningham	Vice President and General Counsel	ray.cunningham@engie.com	

III. SUMMARY OF CONTENTS AND POLICIES

a. Approval and Implementation (25.53(d)(1))

p. 2-3

The approval and implementation section of the EOP introduces the EOP and outlines its applicability. It lists the individuals responsible for maintaining and implementing the EOP and those who can change the EOP. It also provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing on April 15, 2022 or the deadline as extended by the Commission. It provides a dated statement that the current EOP supersedes previous EOPs, and also states the date the EOP was most recently approved by Think Energy.

b. Communication Plan (25.53(d)(2))

p. 3-4

The communication plan describes the procedures during an emergency for Think Energy's communication with the public, media, customers, the Commission, and OPUC, and the procedures for handling complaints during an emergency. Think Energy has established a streamlined process for emergency communications with the media and the public and will communicate as necessary through a designated spokesperson. Customers will be proactively contacted pre and post emergency in the circumstances described in the Communications Plan. Designated individuals have been established for communications with the Commission and with OPUC. Think Energy will maintain its established processes for customer complaint handling during an emergency.

c. Plan to Maintain Pre-Identified Supplies for Emergency Response (25.53(d)(3))

p. 4-5

Think Energy has compiled a list of pre-identified supplies as described in this plan to sustain continued operations during an emergency. Think Energy will follow an audit process to ensure sufficient maintenance of these supplies in advance of emergencies.

d. Plan to Address Staffing During Emergency Response (25.53(d)(4))

p. 5-8

Think Energy has established a robust plan to address staffing during emergency response that prioritizes the safety of its employees. This plan describes Think Energy's employee notification procedures in the event of an emergency, as well as details for off-site collective work and individual remote work if necessary.

e. Plan to Address Identification of Weather-Related Hazards and EOP Activation (25.53(d)(5))

p. 8-10

This plan addresses how Think Energy identifies various hazards that could necessitate activation of the EOP, including weather-related hazards such as tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding. These processes include utilization of an in-house meteorologist and application of a threat assessment matrix.

f. Annexes (25.53(d)(6))

Think Energy submits the following annexes as required by the rule:

1. Pandemic and Epidemic Annex (25.53(e)(3)(A))

p. 12-15

The pandemic and epidemic annex describes the processes and procedures that Think Energy must follow to continue business operations during a health-related emergency including a pandemic or epidemic.

2. Hurricane Annex (25.53(e)(3)(B))

p. 16-24

The hurricane annex includes a description of Think Energy's response to a hurricane, including evacuation and re-entry procedures for facilities located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management ("TDEM").

The procedures include

3. Cyber Security Annex (25.53(e)(3)(C))

p. 25-26

The cyber security annex describes the processes and procedures that Think Energy must follow to minimize, identify, and respond to operational hazards posed by cyber security-related threats.

4. Physical Security Annex. (25.53(e)(3)(D))

p. 27-40

The physical security annex describes the processes and procedures that Think Energy must follow to minimize, identify, and respond to operational hazards posed by threats to the physical security of the facilities or employees.

IV. RECORD OF DISTRIBUTION

The following table provides the titles and names of persons in each Think Energy's organization receiving access to the EOP and the dates of access and distribution of the EOP. No training has yet occurred for the current version of the EOP as training is under development. Employee training is expected to occur by September 2022. The below table will be updated to reflect employee training dates as necessary.

Individual Name	Title	Action (Distribution, Access, or Training on the EOP)	Date of Distribution, Access, or Training
Greg Leflar	Vice President, Operations and Digital	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
J.D. Burrows	Vice President, Marketing and Customer Engagement	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
Jay Bell	Vice President, Sales	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
Alanna Sinclair	Billing Director	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
John Farley	Customer Service and Relations Director	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
Alicia Nieto	Account Services Director	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)
Richard Wirth	Marketing Director	Access and Distribution	4/18/2022 via document database (training modules to be completed – estimated September 2022)

V. AFFIDAVIT

Think Energy attaches an affidavit on the next page from Greg Leflar, the highest-ranking representative, official, or officer with binding authority over Think Energy in accordance with 16 TAC § 25.53(c)(4)(C).

VI. DRILLS

This section of the EOP affirms Think Energy's commitment to conducting an annual drill each calendar year to test the EOP. This section contains instruction on the notice requirements for conducting annual drills to the Commission and to TDEM District Coordinators as required by 16 TAC § 25.53(f).

AFFIDAVIT

STATE OF TEXAS §
 §
 COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this day personally appeared Greg Leflar to me known to be the person whose name is subscribed to the foregoing instrument, who being duly sworn according to law, deposes and says:

“1. My name is Greg Leflar. I am over the age of eighteen and am a resident of the State of Texas. I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of Engie Retail, LLC d/b/a Think Energy (“Think Energy”) as the highest-ranking representative, official, or officer with binding authority over Think Energy.

2 I swear or affirm that in my capacity as Vice Preside of Operations and Digital, I have personal knowledge of the facts as stated in this Affidavit which is given in support of Think Energy’s Emergency Operations Plan (“EOP”) submission to the Public Utility Commission of Texas (“PUCT”) and to the Electric Reliability Council of Texas (“ERCOT”) as required by 16 Tex. Admin. Code (“TAC”) § 25.53. I further swear or affirm that all of the statements and/or representations made in this affidavit are true, complete, and correct to the best of my knowledge.

3. I further swear or affirm that relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

4. I further swear or affirm that the EOP has been reviewed and approved by the appropriate executives.

5. I further swear or affirm that Think Energy intends to conduct a drill consistent with 16 TAC § 25.53(f) before December 1, 2022 and will provide notice to the Commission at least 30 days before that drill is conducted. Once that drill is conducted, Think Energy will notify the Commission.

6. I further swear or affirm that the EOP or an appropriate summary has been distributed to local jurisdictions as needed.

7. I further swear or affirm that Think Energy maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

8. I further swear or affirm that Think Energy’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training on or before September 30, 2022.”

Further affiant sayeth not.

DocuSigned by:

Greg Leflar

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GREG LEFLAR

VICE PRESIDENT OF OPERATIONS

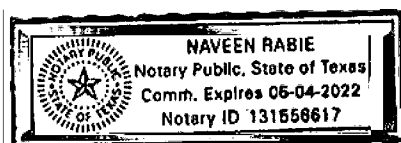
ENGIE RETAIL, LLC D/B/A THINK ENERGY

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 15th day of April, 2022.

TR

Notary Public in and for the
State of Texas

My Commission Expires:



Engie Retail, LLC d/b/a Think Energy

**EMERGENCY
OPERATIONS PLAN**

Version No. 1.0

I. Approval and Implementation (25.53(d)(1)(A))

This Emergency Operations Plan (“EOP”) applies to Engie Retail, LLC d/b/a Think Energy (“Think Energy”). The EOP sets forth Think Energy’s common operational functions that are relevant across emergency types and includes annexes that outline Think Energy’s response to specific types of emergencies. The objectives of the plan include to identify and document measures that will enable Think Energy to effectively respond to a disruptive event and restore critical business operations in a timely manner; document procedures to protect essential systems, applications, facilities, equipment, and other assets at the time of a disruption; facilitate effective decision-making to ensure that business operations are restored in a timely manner; enable effective communication and ensure quick and accurate dissemination of data; and ensure employee safety and security and minimize loss of life. This EOP is submitted to the Public Utility Commission of Texas (“Commission”) and to the Electric Reliability Council of Texas (“ERCOT”) in compliance with the requirements of 16 Tex. Admin. Code (“TAC”) § 25.53.

a. The following individuals are responsible for maintaining and implementing the EOP, and/or have ability to change the EOP as described below (25.53(d)(1)(B):

Employee	Title	Authority
Greg Leflar	Vice President of Operations and Digital	Authority to Maintain and Implement EOP
Sayun Sukduang	President and Chief Supply Officer	Authority to Maintain and Implement EOP
J.D. Burrows	Vice President and Chief Supply Officer	Authority to Maintain and Implement EOP
David Benhamou	Head of Power Portfolio Risk Management	Authority to Implement EOP
Ray Cunningham	Vice President and General Counsel	Authority to Modify, Change, or Edit the EOP
Naveen Rabie	Senior Counsel	Authority to Modify, Change, or Edit the EOP
Marsha Griffin	Senior Paralegal	Authority to Modify, Change, or Edit the EOP

b. Revision Control Summary (25.53(d)(1)(C)

The below table discloses the dates of each change made to the EOP since the initial EOP was submitted in accordance with 25.53(c)(1), meaning April 15, 2022 or a later time as provided by the Commission’s extension of the April 15, 2022 deadline.

EOP Section	Version	Date of Change	Description of Change
Entire EOP	1.0	April 15, 2022	Update existing EOPs to comply with new 16 TAC § 25.53

c. Statement of Supersession (25.53(d)(1)(D))

Effective April 15, 2022, Version 1.0 of the EOP supersedes all previous EOPs and shall remain in effect until an amended EOP is submitted to the Commission and reflected in the EOP's revision history.

d. Statement of Approval (25.53(d)(1)(E))

Version 1.0 of the EOP was most recently approved on April 18, 2022 by the appropriate officers for Think Energy.

II. Communication Plan (25.53(d)(2))

In the event of an emergency, Think Energy will communicate with the appropriate entities as follows:

- Public Communication Procedures: If an emergency necessitates formation of a Group Crisis Cell (as described in this EOP), communication will be managed directly by the representative of the Group Communication and Brand Department among its members. If there is no Group Crisis Cell, for serious events with national or international coverage, any draft external communication prepared must be approved by the Group Communication and Brand Department before distribution, as well as by the appropriate management level within the Global Business Units. This applies also to all photos and videos.
- Media Communication Procedures: Think Energy has identified a communication structure (press relations/spokesperson, internal and external communications) for responding to local or global crisis. In a crisis Think Energy will control the communication with the media, with only the appointed spokesperson, who has been trained for this purpose, authorized to speak to the journalists.
- Customer Communication Procedures: Customer communication procedures during an emergency will be overseen by Think Energy's Vice President of Marketing, J.D. Burrows. Prior to an impending emergency and through the method authorized in customer contracts, Think Energy will proactively contact customers who are on variable rate or indexed rate plans that could be financially impacted by the emergency, such as in the case of extreme hot or cold weather that will be reasonably expected to increase demand. Think Energy will advise customers of the potential impact to customers' bills and encourage curtailment of usage as appropriate to minimize charges. During an emergency, Think Energy will abide by the same methods of customer communication contemplated by customer contracts. If an alternate method of emergency communication is established during an emergency, Think Energy will publicly post the information on its website. Immediately following an emergency, Think Energy will proactively contact customers to set expectations for billing of charges incurred during the weather event, including any allowance for delayed payment.

- Commission Communication Procedures: Think Energy will be available to respond to any urgent Commission questions or inquiries through its emergency contacts listed in Section II of the Executive Summary to this EOP. Additionally, should Think Energy need to reach out to the Commission during an emergency for any purpose, it will do so through its Vice President of Regulatory Affairs (Jeffrey Levine), its Vice President of Government Relations (Julie Vitek), or a designee thereof.
- OPUC Communication Procedures: Should Think Energy need to reach out to the Office of Public Utility Counsel during an emergency for any purpose, it will do so through its Vice President of Regulatory Affairs (Jeffrey Levine), its Vice President of Government Relations (Julie Vitek), or a designee thereof. OPUC may also communicate with Think Energy during an emergency through contact with the emergency contacts listed on Section II of the Executive Summary to this EOP.
- Complaint Handling Procedures: During an emergency, Think Energy will maintain its existing processes and procedures for addressing customer complaints and take additional steps as necessitated by the particular circumstances of an emergency to ensure customer access in accordance with 16 TAC § 25.485, including:
 1. Ensuring that customers have reasonable access to service representatives to make inquiries and complaints, discuss charges on customers' bills, terminate competitive service, and transact any other pertinent business;
 2. Ensuring customers' telephone access to Think Energy remains toll-free and affords customers a prompt answer during normal business hours to the maximum extent possible during an emergency;
 3. Ensuring Think Energy maintains a 24-hour automated telephone message instructing the caller how to report any service interruptions or electrical emergencies;
 4. Ensuring Think Energy employs 24-hour capability for accepting a customer's rescission of the terms of service by telephone;
 5. Ensuring that a customer may submit a complaint in person, by letter, by fax, by email, or by telephone to Think Energy to the maximum extent possible during an emergency;
 6. Ensuring that Think Energy will promptly investigate and advise a complainant of the results of its investigation within 21 days and that Think Energy complies with the notification and supervisory review procedures described in 16 TAC § 25.485(d).

III. Plan to Maintain Pre-Identified Supplies for Emergency Response (25.53(d)(3))

Think Energy recognizes that in the event of an emergency, certain supplies are crucial to maintaining operation of its retail electric supply functions. To ensure operations can continue during an emergency, Think Energy has established the following plan to maintain certain pre-identified supplies during emergency response:

On an annual basis, Think Energy will audit each of its offices to ensure that the pre-identified supplies described in this section are on-hand and, with respect to technological supplies, operational. If any necessary supplies are missing or not properly functioning, Think Energy will take immediate steps to replace the supplies as necessary. This audit must occur before the first reasonably expected severe weather season, and in the latest instance by April 1. Audits will begin starting in calendar year 2023.

List of Pre-Identified Supplies for Emergency Response:

- Hardware
 - Laptops
 - Laptop chargers
 - Back-up batteries
 - Wireless internet hotspots
- First-aid kit

IV. Plan to Address Staffing During Emergency Response (25.53(d)(4))

A critical part of any emergency/disruptive event is to send concise information and instructions to the key executives, business leaders, stakeholders, and employees quickly and accurately. Think Energy uses the following processes to address staffing during emergency response:

Any of the triggering events discussed in Section V of this EOP could require setting up a crisis cell. The Chief Executive Officer (“CEO”) for Think Energy is responsible for deciding whether to merely monitor a given situation or to set up a crisis cell. If a crisis cell is set up, the CEO shall appoint the crisis cell’s director. A “crisis” is an “emergency” within the meaning of 16 TAC § 25.53(b)(3).

Employee Communications

Engie North America (“Engie North Am”) is the parent entity of Think Energy. The ENGIE Family Accountability and Assessment System (FAAS) supports Engie North Am’s efforts to assess, manage, and monitor employees and their families affected by a wide-spread catastrophic threat event. The FAAS, in conjunction with the AlertMedia tool, is an event-based system used by Engie North Am during a crisis or an emergency, to aid the company in determining where employees and their family members are located and the status of their safety.

The Engie North Am FAAS provides valuable information to senior management, allowing them to make strategic decisions which facilitate a return to normal operations after a threat event. Engie North Am, and therefore Think Energy, uses the FAAS to track the recovery process as the leadership is committed to address the needs of its employees should they be impacted by the event.

Employees may elect to use the AlertMedia App to receive emergency alerts and to stay in touch when traveling. The AlertMedia app monitors employee’s location and alerts in the event of a threat event occurring in the vicinity of their location. It allows for two-way communication so employee can notify of whereabouts and safety conditions. Engie management is then able to aid and proactively assess the situation.

Occurrence of a trigger event, or when conditions warrant an urgent message to a specific group of employees, the EOC will execute the WAAN process, using the Alert Media tool, delineated below.

The WAAN, provides real-time alerts to all registered employees through a broadcast SMS text message.

WAAN Steps

ENGIE Real-Time Desk personnel shall assume a dual role during crisis response situations [threat events] and establish an EOC. They will activate the WAAN process in the following sequence:

- ☐ The WAAN is initiated at the direction of the Entity or Country Crisis Director.
- ☐ The Entity Crisis Communication Director, or designee, will retrieve the ENGIE NORTH AM's *Crisis Management Guideline 16 "Sending a Wide Area Alert Notification (WAAN)"* located in on the Crisis Management SharePoint:
- ☐ Click on the appropriate tab in the spreadsheet for the Threat Event (Hurricane, Storm/Flooding, Active Shooter, Bomb Threat, Building, Fire, etc.)
- ☐ Review the message and modify according to the latest information received by the Entity or Country Crisis Cell.
- ☐ Review and modify, as required, the recorded message on the ENGIE NORTH AM Emergency Call-in line (phone message instructions posted in WAAN tool)
- ☐ The box labeled "TEXT MESSAGE" is the message that will be received by all WAAN registered users.
- ☐ Send message by pressing on the X found on the upper right-hand side of WAAN Alert Notification tool.
- ☐ Continue monitoring and tracking for updates.
How do you update

Evacuation of Corporate Offices: In the event of a major physical disruption in the Engie office premises, standard emergency procedures for evacuation must be followed. This means immediately:

- Activating the standard alarm procedures for that section of the building to ensure that security and safety departments and emergency authorities are correctly alerted.
- Evacuating the premises by following the evacuation procedures and assembling outside at the designated assembly point, if it is safe to do so.
- Evacuation procedures to be followed are the same as those described in the Hurricane Annex to this EOP.

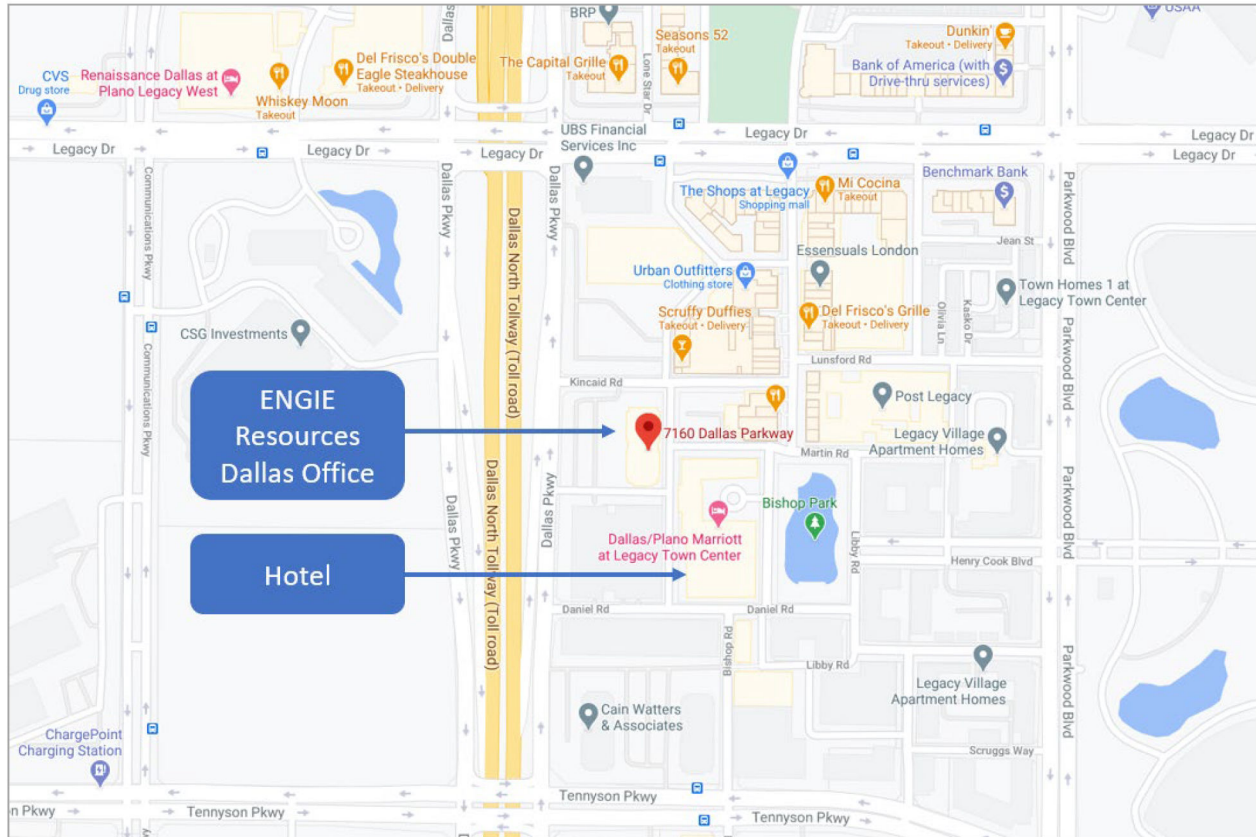
Migration to Alternate Site: Primary work sites are considered to be the Engie corporate offices in Houston or employees' remote work setting. In the event the disruptive event destroys or prevents access to primary work sites for a prolonged duration, the operations must be transferred to an alternate site. Think Energy has made arrangements with a hotel near our Dallas office to be used in case of emergency. Our alternate site consists of the Engie Resources Dallas office and / or the nearby hotel rooms where essential personnel are staying.

Dallas Hotel Information

Dallas/Plano Marriott at Legacy Town Center
7121 Bishop Rd, Plano, TX 75024

(972) 473-6444

Engie Dallas Office Information
Legacy Town Center 1 (LTC1)
7160 Dallas Parkway, Plano 75024
Suite 335



Preparations for Alternate Site (ongoing, and well in advance of hurricane season)

Task	Details	Responsible Person(s)
Maintain agreement with alternate site hotel	Contract with hotel to ensure adequate rooms will be guaranteed for essential employees as needed	VP, Customer Experience
Ensure essential employees have completed training necessary for office entry	Make sure that employees who may be traveling to the alternate site have completed any training necessary to work in ENGIE offices (including COVID-19 training) and that they have access to Dallas office	VP, Customer Experience RVP, ERCOT
Communicate the location of alternate site to key staff	Inform the essential personnel of the location of the selected Dallas hotel and of the Dallas office for ENGIE Resources to ensure mission-critical processes can resume	VP, Customer Experience VP, Supply

	promptly.	
Ensure that the alternate site is properly equipped	Ensure that the alternate site is equipped with the applications, hardware, equipment, and staff required for resumption of mission-critical processes. These details can be found in the results of the BIA.	Dallas Office Ambassador
Coordinate with IT	Ensure internet connectivity and other network requirements for the alternate site.	Director, DevOps
Provide logistical support where needed	Ensure adequate travel arrangements for staff. If key-staff members can work from home, ensure there is a VPN set up for them to do so.	

Migration to Alternate Site (in response to, or in immediate preparation for emergency event)

Task	Details	Responsible Person(s)
Communicate the location of alternate site to key staff	Inform the key staff of the new location to ensure mission-critical processes can resume promptly.	
Communicate with key customers and vendors	Inform customers and vendors about the interim location.	
Ensure that the alternate site is properly equipped	Ensure that the alternate site is equipped with the applications, hardware, equipment, and staff required for resumption of mission-critical processes. These details can be found in the results of the BIA.	
Coordinate with IT	Ensure internet connectivity and other network requirements for the alternate site.	

V. Plan to Address Identification of Weather-Related Hazards and EOP Activation (25.53(d)(5))

Trigger events that may require activation of the EOP (or some component thereof) at the discretion of Think Energy's Chief Executive Officer are listed as follows:

- Any accident resulting in injuries to a significant number of third parties or the death of a third party, where the accident may be linked to Engie services or facilities
- Any death of a staff member (permanent or temporary employee) in the course of their professional activities
- Any death of a staff member employed by a contractor while that person was working on behalf of the Group (occupational accident)
- Any other events which Corporate will need to report to the public authorities
- Natural or other disasters that may have serious consequences in terms of endangering individuals or interrupting service provision and have a high predicted or confirmed media impact

- Faults in a facility owned by the Group or another company where these will directly or indirectly incur the risk of a long-term interruption to the operation of facilities (e.g. terminals, power stations), have serious consequences for energy or service provision and are likely to have a high predicted or confirmed media impact
- Malicious actions targeting important or sensitive Group or non-Group facilities, which may have considerable repercussions on the safety of individuals and/or property or the provision of services
- Malicious actions (of any type) targeting staff and their families where these concern expats or staff on assignments – these range from threats, blackmail or extortion to hostage-taking or kidnapping
- Attacks on or serious faults in Information Systems, be they Industrial Control Systems or Management Information Systems
- Breach of confidentiality resulting in the disclosure of personal data
- Events that could incur the liability of Senior Managers or legal entities
- Major political crises, armed conflicts, acts of terrorism, attacks, piracy at sea;
- Health crises or major conflicts that could affect staff and continuity of service;
- Major labor disputes entailing serious, long-term disruption of essential service (especially energy) provision
- Any other event not included in this list that has a serious impact in terms of the safety of individuals, the number of victims, damage to property, the environment, the Group's image, or major financial consequences in the short to medium term.

Think Energy has also established the following plan for identifying the following **weather-related hazards** to activate the EOP:

Think Energy employs an in-house meteorologist who supplies alerts when severe weather-related hazards are forecasted, such as **tornadoes, hurricanes, extreme hot weather, extreme cold weather, droughts, or floods**. Think Energy supplements those notifications on a location-by-location basis by independent monitoring of local weather news coverage. The EOP will be activated in response to each weather event at the discretion of Think Energy's Chief Executive Officer as informed by, or in consideration of, Think Energy's "natural disaster" threat risk assessment described below.

THREAT EVENT RISK ASSESSMENT

#	Type of Event / Disaster	Probability	Severity	Risk Rating	List of Consequences / Impacts	Approach	Preventive Action
Natural Disasters							
1	Hurricane / Tornado	4	4	16	Loss of electricity in the region, restricted access to the building and potential damage to office spaces, supplier and vendor downtime.	Mitigate (Crisis Guide 04 & 05)	Insurance, evacuation procedures, infrastructure to work from home. Activate HURRICANE SEASON PREPAREDNESS PLAN.
2	Earthquake	2	5	10	Restricted access to the building and potential damage to office spaces, supplier and vendor downtime.	Mitigate (Crisis Guide 03, 21)	Insurance, earthquake resistant building construction, evacuation procedures, infrastructure to work from home. Activate Earthquake Action Plan
3	Pandemic (Public Health Emerg)	2	4	8	Incapacitation of workforce, closure of facilities to protect workforce, activation of work from home policy.	Mitigate (Crisis Guide 03, 11)	Comprehensive health insurance for employees. Activate PANDEMIC INFLUENZA PLAN.
4	Wildfire	4	2	8	Loss of electricity in the region, restricted access to the building and potential damage to office spaces, supplier and vendor downtime.	Mitigate (Crisis Guide 03,22)	Insurance, evacuation procedures, infrastructure to work from home. Activate WILD FIRE SEASON PREPAREDNESS PLAN (TO BE WRITTEN).
Man-Made Disasters							
5	Third-Party Disruptions	3	3	9	Delay in delivery and potential loss of data/goods.	Mitigate (Crisis Guide 03, 06, 08, 10)	Contract with alternate suppliers, include BC terms in contracts with third parties, activation of plan (if needed).
6	Building Fire	2	3	6	Restricted access to the building and potential damage to office spaces, supplier and vendor downtime.	Prevent/ Mitigate (Crisis Guide 09)	Building Management Company protocols for fire prevention, detection and suppressing. Security services, employee evacuation. Activate Fire Evacuation Plan
7	Cyber Attack	2	3	6	Denial of service, inability to access critical applications and data, unauthorized access to confidential data.	Prevent/ Mitigate (Crisis Guide 03, 13)	Regular testing of firewalls, update security infrastructure, train employees to spot phishing attempts, regular patches to network, cybersecurity insurance. Activate Cyber Attack Plan.
8	Civil Unrest/ Terrorism	2	4	8	Incapacitation of work force, restricted access to the building and potential damage to office spaces, supplier and vendor downtime.	Mitigate (Crisis Guide 03, 06, 08, 10)	Security services, employee evacuation. Activate relevant Action Plan based on scenario.

VI. Drills

In accordance with 16 TAC § 25.53(f), Think Energy must conduct or participate in at least one annual drill each calendar year to test the EOP. Following an annual drill, Think Energy must assess the effectiveness of its emergency response and revise this EOP as needed. If an Think Energy facility operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex.

Prior to conducting an annual drill, Think Energy must, at least 30 days prior to the date of the drill, notify Commission Staff using the method and form prescribed by Commission Staff on the Commission's website and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. Think Energy is not required to conduct or participate in a drill in the same calendar year in which its EOP was activated in response to an emergency.

VII. Annexes

The following annexes are attached and incorporated into this EOP:

1. Pandemic and Epidemic Annex
2. Hurricane Annex
3. Cyber Security Annex
4. Physical Security Annex

PANDEMIC AND EPIDEMIC ANNEX

I. PURPOSE AND SCOPE

This Pandemic and Epidemic Annex to Think Energy's EOP sets forth the plan to address procedures for an emergency caused by a pandemic or epidemic.

II. PLAN

AUTHORITY

This Pandemic Plan ("Plan") is authorized by *ENGIE NA*.

SCOPE

The Plan covers the maintenance of critical business operations during and after a business disruption caused by employee absence or relocation during a pandemic disease.

POLICY STATEMENT

It is the policy of **ENGIE NA** to provide a plan for business continuity that includes clear strategies and procedures in the event of an interruption that compromises the ability of the organization to carry out its critical operations. The determination that such an interruption has occurred will be made by *BCC*.

The seasonal influenza virus is already a significant cause of absenteeism, lower productivity, and disruption in the lives of our employees. The threat or onset of a pandemic disease will create a major disruption of business operations should it occur. In preparation for such a threat, **ENGIE NA** has developed this Plan to sustain business operations during a pandemic disease event.

DISEASE PLAN ADMINISTRATION

[See the Business Continuity Teams in respective sections for contact information]

Disease Plan Administrator (Administrator). The Administrator is responsible for implementation of all aspects of this Plan and for directing the recovery of business operations and has full authority to make decisions related to recovery efforts. The Administrator may delegate authority to other personnel to implement specific components of the Plan. The BCC is the Administrator.

Business Continuity Team member. The Business Continuity Team members are responsible for implementing the portions of the Plan for their functional areas and are given authority to do so by the Plan Administrator.

Human Resources. Implements any changes or amendments to personnel policies during a pandemic disease emergency and is represented on the CPT.

Plan Activation and Deactivation

The Administrator will activate the Pandemic Disease Plan when:

- Federal, state, or local public health authorities issue an alert concerning a pandemic disease outbreak.
- Employee absenteeism exceeds or is expected to exceed *20% of* employees. The Administrator will deactivate the Plan as deemed appropriate.

Essential Personnel for Critical Operations

The Plan Administrator shall be informed by the CPT Lead/CRCC Coordinator on the status of essential personnel available for continuity of business operations. A listing of essential personnel is located in the Contingency Planning Section.

Plan Coordination with Other Organizations

This plan shall be informed by having the CPT Lead and BCP Director conduct the following:

- Collaborate with insurers, health plans, and major local healthcare facilities to share pandemic plans and understand their capabilities and plans.
- Collaborate with federal, state, and local public health agencies and/or emergency responders to participate in their planning processes.

HUMAN RESOURCES POLICIES AND EMPLOYEE EDUCATION & INFORMATION PROGRAM

Human Resources Directorate will develop or obtain materials covering the signs and symptoms of the **disease**, modes of transmission, personal and family protection and response strategies (e.g. hand hygiene, coughing/sneezing etiquette, contingency plans), and resources for obtaining countermeasures such as vaccines and antiviral drugs.

Vaccine shots will be provided to employees when available, but availability is not guaranteed. All employees are urged to receive their vaccine shot through their doctor or other health service, and to make sure that their family's immunizations are up to date. Employees over the age of 65 or those with a chronic illness such as diabetes or asthma are urged to receive a pneumonia shot to prevent secondary infection.

This facility has adopted **disease** prevention general hygiene practices that will be followed by employees while they are in the facility and recommended for employees to follow at home. These practices will be posted in all breakrooms.

Employee Notification

At the onset of pandemic disease, or when a pandemic alert is posted, Human Resources will distribute the pandemic disease educational materials to all employees. The CPT Lead will coordinate the messaging to communicate the pandemic status and actions for employees via WAAN, company's intranet and/or email.

Employees will be updated periodically concerning:

- The status of business continuity efforts
- The schedule for the resumption of operations
- Alternate work locations
- Company or department employee meetings
- Payroll
- Human resources activities
- Ill co-workers

Human Resources Policies [Pending Approval]

The following amendments to the employee policies will apply when this Pandemic Action Plan is activated and for the duration of the emergency.

Extended Sick Leave

In the event of a disease pandemic, employees will be permitted additional paid medical leave if they are infected with the pandemic virus or if they have been exposed to it.

Family or dependent care. Additional sick paid leave will be granted to employees who are unable to work due to the pandemic for reasons unrelated to their own illness, such as to care for family members who are ill, or to care for a dependent child whose school has closed temporarily due to the pandemic.

Stay at Home Policy

Influenza / Flu-like illnesses

Employees who have symptoms of influenza-like illness shall work from home and not return to work until at least 24 hours after any fever (i.e., 100° F [37.8° C] or greater) has subsided.

Any employee who is diagnosed by a licensed healthcare provider with an disease virus listed by the Centers for Disease Control and Prevention as a pandemic flu (e.g., Type A H1N1 (swine) flu, Type A H5N1 avian flu), will not return to work until 7 days after symptoms appear and all fever has subsided.

Coronavirus (2019-nCov)

In the event of the coronavirus 2019-nCoV, symptoms can show up anywhere from 2 to 14 days after exposure. Early on, they're a lot like the common cold. One might notice: Fever, cough, and shortness of breath.

Infections range from mild to serious. The virus can turn deadly if it leads to pneumonia, respiratory failure, or septic shock. Those most at risk of death are the elderly and people with weakened immune systems.

Treatment

Currently, no antiviral medication is recommended to treat infection with the new coronavirus. Treatment is directed at relieving symptoms and may include:

- Pain relievers

- Cough syrup or medication
- Rest
- Fluid intake

Telecommuting

The Administrator or designee will create a list of employees who could successfully perform their jobs, or elements of their jobs, through telecommuting. The list will include a determination of whether employees will need laptops or have adequate home computers sufficient to perform their work.

EXTERNAL COMMUNICATIONS

Customer Services

The Administrator or designee will notify customers concerning the effects of business operations and assist with customer needs and requests.

Vendors and Contractors

The CPT will reach back to their respective functional directorates and coordinate the contacting of vendors and contractors with information or instructions concerning business operations during a disease pandemic.

Press or News Media

All inquiries or requests for company information from the press or news media will be referred to the CPT Communications Executive. Only authorized personnel are permitted to make statements to the media.

Business Travel

Business travel will be suspended for the duration of the disease pandemic, or pandemic action alert. Employees who are traveling at the time of a pandemic disease or alert will immediately return home or follow the directions of government authorities. Any traveling employees will contact their supervisor with a status of their location and when they have reached their destination.

HURRICANE ANNEX

I. PURPOSE AND SCOPE

This Hurricane Annex to Think Energy's EOP sets forth the procedures for hurricane-related activities, including but not limited to evacuation and re-entry for those facilities located within a hurricane evacuation zone, as defined by TDEM. References to Appendices herein are to the Business Continuity Plan applicable to Think Energy.

II. GENERAL PROCEDURES

The following summarizes the Business Continuity Plan for maintaining critical operations before, during, and after a hurricane, the primary threat to Houston operations. The purpose of including this information in the NORAM Plan is to ensure business continuity while safeguarding the health and welfare of NORAM employees and their families. The Atlantic and Gulf hurricane season starts on the 1st of June and ends 30 November.

CONTINGENCY PLANNING ASSUMPTIONS:

- Loss of access to Four Oaks Place (FOP) for up to 72 hours. The ENGIE CyrusOne data center and communication networks stay operational
 - Backup generator power is available at FOP and the CyrusOne data center
 - Critical business systems remain operational and are accessible from the Business Continuity Center in Austin
- Access to Houston systems is obtained from remote locations
 - The BCC - Austin site can access either the FOP or CyrusOne data center
 - Access from other remote access is possible using company laptops via Office 365 or a VPN connection.
 - Monarch Generation Control is enabled from CyrusOne data center.
 - Only essential personnel shall operate from the BCC- Austin

WORKING ENVIRONMENT INFRASTRUCTURE

PERSONNEL AND SYSTEMS HARDWARE ARE IN SEPARATE LOCATIONS

Essential Personnel Site – BCC - Austin Facility

- Facility serves as a backup location for several Houston area businesses
- Vicinity of Austin airport
- Dedicated space which is instantly available
- 50+ seats, meeting area, small kitchen area
- CyrusOne CRCC personnel maintain building and infrastructure
- ENGIE personnel maintain work space and systems
- Common work area (trade floor style) to maintain workflow continuity
- Back-up power, multiple ISPs, high bandwidth, high security
- VPN hardware provides direct connection to FOP network

Backup Systems Hardware Location – CyrusOne Data Center – West Houston Facility

- Houses ENGIE's backup systems hardware

ACCOMMODATIONS FOR EMPLOYEES DURING A THREAT EVENT

- Rooms at three hotels have been contracted in Austin Arboretum Area (Homewood Suites, Hampton Inn and Holliday Inn)
- Option Premium Secures 60 Rooms for One Week During Hurricane Season
- Pet Friendly
- All arrangements are made by the CRCC Coordinator.

CPT completes checklist located in Appendix D prior to 01 June, the start of the Hurricane Season. Employee and family preparedness guidelines shall be communicated via a broadcast email message (See Appendix E)

CRCC MOBILIZATION RESOURCE PLAN

(See Appendix F – Crisis Response Command Center)

GEM

Essential Personnel: 21

Manages ENGIE NA's generation assets in the Gas & Power Wholesale Markets and offers 3rd Party Services. Critical operations and support functions are noted below with the required IT infrastructure.

ENGIE Resources

Essential Personnel: 10

Manages the gas supply business and leverages "Customer IQ" to create a competitive advantage when developing customer-side (B2B) solutions oriented toward their energy and sustainability goals. Critical operations and support functions are noted below with the required IT infrastructure.

Finance & Treasury

Essential Personnel: 1 to 3

The Shared Services business directorate supports various functions across the company: Corporate Accounting, Project Accounting (asset specific), credit, etc. All members of the finance and treasury team have laptops and can work remotely. Nominally, one or two employees travel to the CRCC with the remainder working from home. The threat event shall be evaluated for power loss impact which will determine mobilization requirements. Several team members are cross-trained and can cover/back-up Credit/Treasury functions. Tax would not send employees to the CRCC site; the IRS provides filing extensions for taxpayers affected by natural disasters and waives related penalties. Texas follows the IRS direction in crisis situations.

HR – Legal — Communications

Essential Personnel: up to 3

These three directorates play a key role toward safeguarding the health and well-being of employees and family members during a threat event. Support functions include: (1) maintaining an accurate and up-to-date database of employee and emergency contact information to support the WAAN system; (2) managing the Family Accountability and Assessment System (FAAS); (3) preparing media and internal messaging statements for the EOC/CRCC; and (4) advising on the chronological record of all immediate action steps executed throughout the duration of the event. They all have laptops and may be able to work from home. The

event will determine the need to send any, or all, to the CRCC site.

IT Recovery

Essential Personnel: 3

THREAT EVENT PREPAREDNESS – EBUSINESS CONTINUITY COMMITTEE

BUSINESS CONTINUITY PLAN DIRECTOR

BUSINESS CONTINUITY PLAN DIRECTOR	
Purpose	Facilitates the strategic direction and primary decision-making capability within the BCC team.
Contingency Planning	<ul style="list-style-type: none">▪ Understands the requirements of the plan, supports its implementation and keeps team members informed of activities that may lead to a threat event
Crisis Response	<ul style="list-style-type: none">▪ Follows Business Continuity Plan procedures▪ Informs BCC members of the current situation on a real-time basis from the EOC/CRCC to enable key business decisions▪ Assists in the proper execution of emergency actions to all threat events.▪ Develops policy options and recommends courses of action▪ Coordinates final approval on all official communication messaging to the media, employees and other stakeholders
Disaster Recovery	<ul style="list-style-type: none">▪ Determines when to conclude the event▪ Ensures follow-up with all impacted employees that required assistance▪ Initiates post-event analysis▪ Ensures the lessons learned from events are captured

CRISIS RESPONSE TEAM

Title / Function	Representative	Contact Information
		(Mobile Number)
EOC/CRCC Director	Kyle Gibson (Director, Real Time Optimization)	713-206-0448
EOC/CRCC Operator (Day Shift)	Real-Time Desk Operator (Rotating Position)	1-877-350-8420
EOC/CRCC Operator (Night Shift)	2 nd Real-Time Desk Operator (Rotating Position)	1-877-350-8420

Emergency Operations Center and CRCC Director	
Purpose	To provide leadership and direct supervision during a threat event
Contingency Planning	Coordinates EOC operations for responses, incidents, or planned events Provides resource management and planning for EOC activations.
Crisis Response	Executes immediate actions to mitigate the impact of a threat event. Provides on-going reporting and assessment of the situation to local responders; liaisons and coordinates with on-scene emergency services or other government authorities. Identifies additional resources required from the BCTs.
Disaster Recovery	Conducts a seamless transition of follow-up activities at the conclusion of threat event with the Disaster Recovery Coordinator.
Emergency Operations Center Operator	
Purpose	To ensure the continuity of ENGIE NA operations and manage emergency situations requiring a high degree of reliability, flexibility and critical thinking skills
Contingency Planning	Organizes workload and sets priorities to prepare for unexpected contingencies Ensures that EOC and CRCC facilities are prepared to log the sequence of activities during a threat event

Crisis Response	Promptly responds to emergency calls, assesses the information, informs the EOC Director and takes immediate actions in accordance with the Business Continuity Plan. Maintains an accurate/legal account of crisis response activities on the Log of Actions Sheet (See Appendix U for template) Maintains status boards of personnel impacted by the threat event
Disaster Recovery	Informs EOC Director of all outstanding actions upon end of threat event

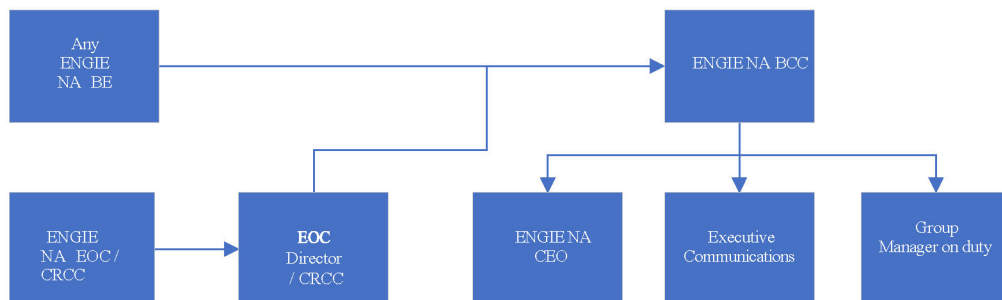
SITUATION REPORT (SITREP)

This report provides an initial assessment of impact from a threat event and informs the BCC of the current situation. Information gathered enables submission of the **Alert Form**—a BCC notification requirement to ENGIE Group on listed reportable events via the crisis management ON DUTY managers. Updates are required every 24 hours at a minimum during an event. (See [Appendix R](#), [Appendix S](#) and [Appendix T](#))

Upon receiving notice of a threat event, the EOC/CRCC Operator must immediately inform the EOC Director. In the event the EOC Director is not available, the EOC/CRCC Operator shall contact the CPT Lead/ CRCC Coordinator.

They will, in turn, contact the BCC Chair or Vice Chair per the diagram below.

Note that any threat event not reported to the ENGIE NA EOC can be reported through the applicable ENGIE NA BE channels. All ENGIE NA threat events will report to the ENGIE NA BCC.



CRISIS SCENARIOS

SCENARIO ONE: LEAD TIME EVENT (\geq 48 HRS NOTIFICATION)

In this scenario, the event is a Severity Level 3 weather event with \geq 48-hour lead time. The CPT Lead will present to the BCC the best course of action within 4 hours after the threat has been determined to have an impact on business continuity in the Houston office. Communication to employees shall be under the direction of the EOC Director in consultation with the CPT Lead and Communications Executive. Several mediums shall be employed: WAAN, email, and ENGIE NA's Employee Emergency Hotline (713-636-1525)

CONTINGENCY PLAN MOBILIZATION PROCEDURE

The following Mobilization Procedure also applies to an event that prohibits entrance to the FOP (i.e. flooding, bomb threat, active shooter, civil uprising, etc.)

Task#	Task List& Description	Primary Responsibility	Alternate	Done
1	Notify the Business Continuity Teams that an event will occur affecting the ENGIE FOP HQ and provide a situational assessment: <ul style="list-style-type: none"> • Business Continuity Committee (BCC) • Contingency Planning Team (CPT) • Crisis Response Team (CRT) 	CPT Lead/CRCC Coordinator	EOC/CRCC Director	
2	Instruct the EOC 24/7 Real Time Desk to send out a WAAN to all ENGIE FOP HQ employees that a threat event will occur, and additional guidance shall be provided within the next 4 hours, i.e. office closure. <ul style="list-style-type: none"> • Update hotline message • Email specific guidance 	CPT Lead/CRCC; Communications Executive	EOC/CRCC Director	
3	Make logistical arrangements for all essential personnel.	CPT Lead/CRCC Coordinator	EOC/CRCC Director	
4	Verify operational readiness of the following items upon arrival of essential personnel at the remote location (Austin): <ul style="list-style-type: none"> • CRCC setup (equipment and manning) • CRT established • Computers connected to the ENGIE NA network and functioning properly • BCP templates in place for immediate use 	CPT Lead/CRCC Coordinator	EOC/CRCC Director	

**SCENARIO TWO: (< 48 HRS. NOTIFICATION)
NO LEAD TIME EVENT CRISIS RESPONSE MOBILIZATION PROCEDURE**

Task#	Task List& Description	Primary Responsibility	Alternate	Done
1	<p>Notify the Business Continuity Teams that an event has occurred, or is about to occur that will impact the ENGIE FOP HQ and provide a current situational assessment:</p> <ul style="list-style-type: none"> • Business Continuity Committee (BCC), • Contingency Planning Team (CPT), 	EOC/CRCC Director	CPT Lead/CRCC Coordinator	
2	<p>Instruct the EOC 24/7 Real Time Desk to send out a WAAN to all ENGIE FOP HQ employees that a threat event has occurred, or is about to occur, and additional guidance shall be provided within the next 4 hours, i.e. office closure.</p> <ul style="list-style-type: none"> • Update hotline message • Email specific guidance • External messaging, i.e. media, agencies 	EOC/CRCC Director; Communications Executive	CPT Lead/CRCC Coordinator	
3	<ul style="list-style-type: none"> • Execute immediate actions for threat event in accordance with the emergency procedures & 	EOC/CRCC Operator	EOC/CRCC Director	
4	<p>In the event of immediate evacuation, notify the ERCOT ISO that ENGIE NA personnel are evacuating the primary facility and mobilizing the EOC 24/7 Real Time Desk to ENGIE NA's CRCC</p> <ul style="list-style-type: none"> • Confirm all systems are in automatic 	EOC/CRCC Operator	EOC/CRCC Director	
5	IF FOP 3 is closed, liaise with building management for status updates on the reopening of FOP 3	CPT Lead/CRCC Coordinator	EOC/CRCC Director	
6	Make logistical arrangements for all essential personnel	CPT Lead/CRCC Coordinator	EOC/CRCC Director	

7	Verify operational readiness of the following items upon arrival of essential personnel at the remote location <ul style="list-style-type: none"> • CRCC setup (equipment and manning) • CRT established • Computers connected to the ENGIE network 	CPT Lead/CRCC Coordinator	ECO/CRCC Director	
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III. EVACUATION PLAN

Upon activation of the EOP due to a hurricane, if evacuation is deemed necessary, standard emergency procedures for evacuation must be followed.

Immediately upon evacuation being ordered, Think Energy will institute the following procedures:

FIRE WARDEN

Each Think Energy facility (“tenant”) should select a minimum of two (2) employees to act as Fire Wardens. These Wardens should be able to direct other employees during an evacuation. The Warden should read all safety materials supplied and must attend high-rise fire safety meetings. Wardens are necessary to comply with the City of Houston Fire Code.

PARTIAL EVACUATION

If Property Management makes an evacuation decision, affected tenants of the building will be given notice via the public address system. Evacuation will proceed via the stairwells.

Following the evacuation, the tenant will be instructed to remain in the temporary refuge area(s) until notified of further action by Property Management.

Area Fire Wardens will provide supervision to allow an orderly and safe evacuation. All areas of the floor must be checked to ensure that all persons are evacuated. Upon completion of the evacuation, the Fire Command Station will be notified accordingly.

TOTAL EVACUATION

When circumstances warrant evacuation of all tenants, the Fire Command Station staff will notify the occupants and the stairwells will be utilized in this process. Tenant Fire Wardens will be instructed by the Fire Command Station and will assist in this effort by maintaining an orderly and safe flow of traffic. The Fire Wardens will check all areas of each floor to ensure that all employees have safely evacuated, and then will proceed to evacuate themselves.

Elevators will be used for evacuation only by direct orders from the Houston Fire Department.

IV. RE-ENTRY PLAN

Upon termination of the emergency conditions posed by a hurricane, if evacuation was previously deemed necessary, standard emergency procedures for re-entry must be followed. Think Energy will permit employee re-entry only after local authorities have confirmed roads are travel-safe and after local weather resources confirm the threat of further severe weather has subsided. Think Energy will communicate re-entry procedures consistent with accessibility of its facilities post-hurricane event and in accordance with its Communication Plan described in this EOP.

CYBERSECURITY ANNEX

I. PURPOSE AND SCOPE

This Cybersecurity Annex to Think Energy's EOP sets forth the plan to minimize, identify, and respond to operational hazards posed by cyber security-related threats.

II. PLAN

Responsible authority: Corporate IT Directorate

Plan in its entirety is a separate document controlled by the responsible authority

Purpose

Designed to defend information systems against cyber-attacks through a spectrum of implemented countermeasures.

Types of Cyber-Attacks

- Defacement and modification of Web pages
- Denial-of-Service (DOS)
- Spam
- Password and/or Encryption Keys Identification
- Software Flaw Exploitation: Circumventing Access Controls
- Buffer Overflows
- Trojan Horses
- Viruses and Worms
- Spyware
- Operating System Intrusion
- Eavesdropping Direct
- Eavesdropping Indirect – Electromagnetic Radiation
- Social Engineering
- Physical Hardware Theft
- Vandalism

Cyber Attack Occurrence Immediate Actions (All Employees)

- ☐ Notify the ENGIE NA Helpdesk [x1666 during business hours and x1182 after hours]
- ☐ The Helpdesk shall notify the Security Operations Manager 713-636-1077, during business hours, and 281-687-5983, after hours.

Emergency Operations Center Immediate Actions

EOC actions upon having indication of Cyber Attack and/or receiving an incident report:

- ☐ **Call ENGIE NA Helpdesk** and provide:
 - Name of affected individual(s) computer
 - Location of affected individual(s) computer system
 - Physical description of the cyber-attack issue
- ☐ Prepare to send a WAAN Alert to all FOP Employees at the direction of ENGIE's IT Security Ops Manager
- ☐ Complete a SITREP Appendix R and send it to the Helpdesk

IT Tasks during a Triggering Event

- ☐ Quarantine Host
- ☐ Invoke emergency patch process or lockdown environment
- ☐ Execute Crisis Management Process
- ☐ Rescan entire infrastructure for presence of threat Owners
- ☐ Resolve incident
- ☐ Document lessons learned & archive

PHYSICAL SECURITY ANNEX

I. PURPOSE AND SCOPE

This Physical Security Annex to Think Energy's EOP sets forth the plan to minimize, identify, and respond to operational hazards posed by threats to the physical security of the offices or employees.

II. PLAN

Procedures outlined below must be followed in each given physical security-related circumstance.

ACTIVE SHOOTER

Indications

General announcing system declaring an active shooter is in the building; hearing gun shots in the surrounding area on a different floor; building facilities management informs tenants of Houston police warnings of imminent active shooter threat in the galleria area.

Immediate Actions:

Shelter in Place in accordance with the below guidance:

All Floor Wardens to:

- ☐ Instruct employees to quickly, but orderly, go to the designated "Shelter-in-Place" location
- ☐ Retrieve emergency supplies: walkie-talkies and door-jamming equipment to secure doors
- ☐ Get assistance from fellow employees to barricade doors and/or secure the area
- ☐ Instruct all employees to follow the rehearsed Floor Plan Drill, as follows:

Floor 12 –

- ☐ Quickly and orderly move to CR-1229 and employees' break room;
- ☐ Barricade the glass door with multiple tables;
- ☐ Stay out of view of CR entrance

Floor 13 –

- ☐ Quickly and orderly move to CR 1314 break room and storage closet area (40-person capacity);
- ☐ Barricade the glass door with multiple tables;
- ☐ Stay out of view of CR entrance

Floor 14 –

- Quickly and orderly move to the Mother's room, (6-person capacity)
- Quickly and orderly move to CR 1406, (20-person capacity) barricade door
- Quickly and orderly move to the IDF room (30-person capacity),
lock and barricade door Floor 15 –
- Quickly and orderly move to the large tax file room (50-person capacity) lock and barricade door Floor 16 –
- Quickly and orderly move to CR1639. (20-person capacity) lock and barricade door
- Quickly and orderly move to large file room. (50-person capacity) lock and barricade door Floor 17 –
- Quickly and orderly move to “Dungeon” room. (40-person capacity) Lock and barricade door. ■ Quickly and orderly move to IDF room. (30-person capacity) Lock and barricade door
- Floor 18 –
- Quickly and orderly move to CR 1828. (30-person capacity) Lock and barricade door
- Quickly and orderly move to large storage room. (40-person capacity) Lock and barricade door.
- Floor 19 –
- Quickly and orderly move to the two large file rooms. (60-person capacity) Lock and barricade door
- Quickly and orderly move to the IDF room (30-person capacity) Lock and barricade door.
- Floor 20 –
- Quickly and orderly move to the Helpdesk room ■
- Quickly and orderly move to the computer room
- Quickly and orderly move to the file room (2)

Contact the Emergency Operations Center @ 1- 877- 350 - 8420 to report incident as the situation safely allows and provide the EOC with the following information:

- Building location: **1360 Post Oak Blvd – FOP** [applies to 911 call]
- Numbered floor of Active Shooter when last sighted
- Number of shooters
- Physical description
- Number and types of weapons
- Number of potential victims
- **Call 911** if unable to contact the EOC with the above information.

Emergency Operations Center Immediate Actions

EOC actions upon having indication of an active shooter and/or receiving an incident report:

Call 911 and provide:

- Location (**1360 Post Oak Blvd – FOP**)
- Numbered floor of Active Shooter when last sighted
- Number of shooters
- Physical description
- Number and types of weapons
- Number of potential victims

Broadcast the appropriate WAAN message that is templated for immediate release. Follow the instructions found in [Appendix W – WAAN Procedure](#) for an **Active Shooter** Scenario.

Contact the FOP 3 Building Security and report incident.

EMERGENCY (POLICE / FIRE)	911
SECURITY OFFICE	713-552-4850
HOUSTON POLICE DEPARTMENT (NON-EMERGENCY)	713-247-5420
HOUSTON FIRE DEPARTMENT (NON-EMERGENCY)	713-247-5000

Complete a post-incident report and send it to the ENGIE NA Health & Safety Directorate

1. **Floor Warden IMMEDIATE ACTIONS**

Follow Immediate Actions for Shelter in Place on respective floor.
Take out the appropriate supplies: door jams, heavy equipment to block access and quickly move to the secure space.
Remain in shelter-in-place until further notice from Building Management.
After incident, replenish supplies and report any modifications to the original plan.
Floor Warden information found in Appendix P. Click, [HERE](#).

No Active Shooter on Office Floor

Indications:

If there is no notice of the active shooter being on your office floor in FOP-3

Immediate actions:



RUN

Leave belongings behind;
Escape to stairwell if possible;
Escape to closest conference or storage room and barricade accordingly;
Contact the Emergency Operations Center @ 877-350-8420 to report incident as the situation safely allows and provide:

- Numbered floor of Active Shooter when last sighted
- Number of shooters
- Physical description
- Number and types of weapons
- Number of potential victims

Call 911 if unable to contact the EOC with the above information to include building location:
1360 Post Oak Blvd – FOP

HIDE

Be out of Active Shooter's view;
Hide behind large items
(i.e., cabinets, desks);
Silence phones and
remain quiet

FIGHT

As a last resort and only when life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:
Setting up an ambush to restrain the assailant.
Create improvised weapons and coordinate an attack with fellow employees.
Create a distraction and/or feint to increase probability of success in engaging and halting the shooter.

When law Enforcement arrive remain calm and follow their

Always keep hands visible; immediately raise hands and spread fingers;
Avoid making quick movements toward officers and do not hold on to them for safety;
Avoid pointing, screaming and/or yelling

SHELTER -IN-PLACE (TERRORIST ATTACK: TOXIC GAS EXPLOSION)

Sheltering-in-Place Guidelines

When ENGIE NA management determines the environment outside the facility is too dangerous or government authorities provide directions to shelter in place, the business will be closed.

Customers, clients, or visitors in the building will stay inside the FOP facility with their ENGIE NA sponsor.

Unless there is an imminent threat, employees, customers, clients, and visitors should call their emergency contact to let them know where they are and that they are safe.

ENGIE's automated phone message will be changed to indicate that the office is closed, and that staff and visitors are to remain in the building until authorities advise it is safe to leave.

Exterior doors will be locked; windows and air vents will be closed. EOC will coordinate with building management to turn off all fans: heating and air-conditioning systems, and other noncritical equipment as required based on the emergency.

If there is danger of explosion, window shades, blinds, or curtains will be closed.

All ENGIE NA employees shall go to their designated Shelter-in-

Place locations listed in App H. Seal all windows, doors, and vents with plastic sheeting and duct tape.

Cut plastic sheeting to seal windows, doors, and air vents. Each piece should be several inches larger than the space to be covered to ensure it lies flat against the wall/ceiling.

Fire Warden conduct roll call and inform EOC of any missing personnel, both employees and visitors.



EOC shall listen to the radio, monitor the local news, or use the Internet to provide further instructions via the WAAN.

EOC IMMEDIATE ACTIONS in event of a Toxic Gas Explosion Incident

- ☐ Call 911 and provide:
 - Location (1360 Post Oak Blvd – FOP)
 - Description of incident
 - Number of potential victims (if information is known) ☐ Contact the FOP Building Security and report incident

EMERGENCY (POLICE / FIRE)	911
SECURITY OFFICE	713-552-4850

HOUSTON POLICE DEPARTMENT (NON-EMERGENCY)	713-247-5420
HOUSTON FIRE DEPARTMENT (NON-EMERGENCY)	713-247-5000

- ☐ Broadcast the appropriate WAAN message that is templated for immediate release by following the instructions found in Appendix W – WAAN Procedure for a **Toxic Gas Explosion Scenario**.
- ☐ Complete a post-incident report and send it to the ENGIE NA Health & Safety Group.

Floor Warden IMMEDIATE ACTIONS

- ☐ Follow the Toxic Gas Explosion Scenario Plan specific to its floor; designated Shelter-in-Place locations listed in App H
- ☐ Take out the appropriate supplies: walkie-talkies, plastic sheeting rolls, duct tape and scissors, and quickly close all air vents and secure door openings.
- ☐ Remain in shelter-in-place until further notice from Building Management.
- ☐ After incident, replenish supplies and report any modifications to the original plan. ☐ Floor Warden information found in **Appendix P**. Click [HERE](#).

BOMB THREATS & CHECKLIST

BOMB THREATS may be received by telephone, mail, or in person. Employees that receive a bomb threat or sight a suspicious item shall immediately notify the EOC.

There are two reasons for a caller to report a bomb at a location:

- ☐ The caller knows that an explosive or incendiary device has been, or will be, placed in the FOP3 building and wants to minimize personnel casualties. The caller may be the person who planted the device, or just someone who is aware of such information.
- ☐ The caller wants to create an atmosphere that spreads panic and disrupts normal business activity.

Bomb Threat

Suspicious Items [Do not touch or move object when identified]

- ☐ Letters that are unusually bulky or weighty
- ☐ Parcels or envelopes with chemical or oily stains
- ☐ Parcels or envelopes without a return address
- ☐ Parcels or envelopes with foreign postmarks
- ☐ Excessive postage
- ☐ Protruding wires or metallic attachments
- ☐ An uncharacteristic smell
- ☐ Incorrect spelling or phrases like “Confidential for”, “Eyes Only”, or “personal for”
- ☐ Unfamiliar courier delivering official-looking packages

Phone Bomb Threat

- ☐ Be calm and courteous. Listen. Do not interrupt the caller.
Try to signal to someone while the caller is on the line.
 - ☐ Obtain key information: **Use the ENGIE NA Bomb Threat Checklist**
 - ☐ Call and inform the EOC on information gained and await further guidance via the WAAN
- NOTE: Completed checklist is automatically saved in BCP folder on ENGIE Connect SharePoint

EOC Immediate actions upon receiving a Bomb Threat Report

- ☐ Contact 911
- ☐ Contact the FOP 3 Building Security and report incident.

EMERGENCY (POLICE / FIRE)	911
SECURITY OFFICE	713-552-4850
HOUSTON POLICE DEPARTMENT (NON-EMERGENCY)	713-247-5420
HOUSTON FIRE DEPARTMENT (NON-EMERGENCY)	713-247-5000

- ☐ Broadcast WAAN text message that is templated for immediate release by following the instructions found in Appendix W – WAAN Procedure for a **Bomb Threat Report Scenario**.
- ☐ Inform the BCC on current situation and actions taken.

- ☐ If authorities elect to evacuate personnel from FOP-3, inform Floor Wardens and ENGIE NA employees via WAAN text message to activate the Building Evacuation Plan. If authorities elect to have personnel remain in place, inform Floor Wardens and ENGIE NA employees via WAAN text message to activate the designated Shelter-in-Place Floor Plan.
- ☐ Ensure FOP 3 Building Security communicates required actions via the public-address system.
- ☐ If instructed by authorized personnel, be ready to send additional WAAN text messages with detailed instructions on evacuation routes or which floors require shelter in place in lieu of evacuation based on bomb location. WAAN text messaging supplements public- address system communications by Building Security personnel.
- ☐ Fill-out the attached Bomb Threat Checklist as soon as the information is available.
- ☐ NOTE: This BCP provides a Floor Warden List of the designated individuals and alternates by floor and a map listing the rally points for each floor. Floor Warden information found in **Appendix P**. Click, [HERE](#).

Bomb Threat Checklist

BOMB THREAT CHECKLIST [ACTIVE LINK PENDING]

Questions to Ask

1. When is the bomb going to explode?
2. Where is it?
3. What does it look like?
4. What kind of bomb is it?
5. What will cause it to explode?
6. Did you place the bomb?
7. Why?
8. What is your address?
9. What is your name? Who are you?
10. Where are you calling from?

Exact Wording of the Threat:

Sex of caller: _____ Race: _____

Age: _____ Length of call: _____

Number at which call was received:

Time: _____ Date: _____

Your name: _____

(person who received call)

Position: _____

Phone number: _____

Call directed to: _____

Did caller appear familiar with the building or office by the description of the bomb location?

Keep the caller talking. Ask questions.

Do not hang up, even if caller does; leaving phone off hook may help trace.

Calm

☐

Nasal

☐

Angry

☐

Stutter

☐

Excited

☐

Lisp

☐

Slow

☐

Raspy

☐

Rapid

☐

Deep

☐

Soft

☐

Ragged

☐

Loud

☐

Clearing throat

☐

Laughter

☐

Deep breathing

☐

Crying

☐

Cracking voice

☐

Normal

☐

Disguised

☐

Distinct

☐

Absent

☐

Slurred

☐

Familiar

☐

If voice is familiar, whom did it sound like?

BACKGROUND NOISES:

Street noise

☐

Factory machinery

☐

Cafe/bar

☐

Animal noises

☐

Voices

☐

Clear

☐

PA system

☐

Static

☐

Music

☐

Local

☐

House noises

☐

Long distance

☐

Booth

☐

Motor

☐

Office machinery

☐

Airplanes

☐

Trains

☐

Traffic

☐

Other: _____

THREAT LANGUAGE/MANNER:

Well-spoken (educated)

☐

Incoherent

☐

Taped

☐

Foul

☐

Message read by threat maker

☐

Irrational

☐

Write out the caller's message in its entirety and any other comments on a separate sheet of paper.

REPORT CALL IMMEDIATELY TO 911.

☐ call the front desk, and notify your manager or supervisor

FIRE EVACUATION

Important Points to Remember

- ☐ If caught in smoke, take short breaths, breathe through nose and keep low to the ground or crawl to escape; the air near the floor is cooler and easier to breathe.
- ☐ Touch all doors before opening them with back of hand. Do not open doors that feel hot - seek another exit.
- ☐ Do not break windows, this would allow fresh air to rush in and fuel the fire.
- ☐ If trapped in a room or area by fire, smoke or physical limitation, place damp towels along the base of doors and feel the doors for heat.

Incident Response – if you discover FIRE

- ☐ Pull the nearest fire alarm and call the EOC from a safe area. Dial 877-350-8420 or 9-911 if unable to reach the EOC and provide the following information:
 - 1360 Post Oak Blvd – FOP
 - Floor and Location (Suite #) of the Fire Emergency
 - Give details of the Fire Emergency

Alarm Response

- ☐ Listen for instructions provided on the public-address system from FOP Building Security personnel and any WAAN texts received by the EOC. Floor Wardens will assist in executing all immediate actions.
- ☐ Assist others in evacuating to include those that are disabled; walk single file on the right side of stairs
- ☐ Relocate to designated rally point outside the building via the stairwells. Do not delay evacuation to retrieve personal belongings or to wait for co-workers.
- ☐ Restrict the spread of the fire by closing doors as you exit.

Fire Drills

Annual Fire Drills are required, per local fire code, in all buildings with a fire alarm.

- ☐ Drills will typically take place shortly after Floor Warden training has been completed. ☐ Speed of exiting is secondary to maintaining order in a controlled manner.
- ☐ Audio and visual alarms will activate; the public-address system will announce “Drill” prior to

alarm activation.

- ☐ All tenants and employees are expected to participate.
- ☐ Review location of rally points and requirements of the Floor Warden to conduct a roll call.
- ☐ Ensure all visitors know their rally point and the Floor Warden for the 19th floor shall include the visitor log with the 19th floor employee list.

Emergency Operations Center Immediate Actions

- ☐ Contact 911
- ☐ Contact FOP Building Security and report incident; they will coordinate actions with the Houston police and fire departments.
 - direct line: FOP Building Security 713-552-4850
 - FOP main office number, 713-552-4802, is also forwarded to the security console after business hours
 - main office is in the garage breezeway on level 1 by the 1330 building entrance
 - a lobby ambassador is located in each building; they also have additional roving officers to assist

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HOUSTON POLICE DEPARTMENT (NON-EMERGENCY)	713-247-5420
HOUSTON FIRE DEPARTMENT (NON-EMERGENCY)	713-247-5000

- ☐ Broadcast WAAN text message that is templated for immediate release by following the instructions found in Appendix W – WAAN Procedure for a **Fire Evacuation Scenario**.
- ☐ Inform the BCC on current situation and actions taken.
- ☐ If authorities elect to evacuate personnel from FOP-3, inform Floor Wardens and ENGIE NA employees via WAAN text message to activate the Building Evacuation Plan. If authorities elect to have personnel remain in place, inform Floor Wardens and ENGIE NA employees via WAAN text message to activate the designated Shelter-in-Place Floor Plan.
- ☐ Ensure FOP 3 Building Security communicates required actions via the public-address system.
- ☐ If instructed by authorized personnel, be ready to send additional WAAN text messages with detailed instructions on evacuation routes or which floors require shelter in place in lieu of evacuation based on fire location. WAAN text messaging

supplements public-address system communications by Building Security personnel.

- ☐ Fill-out the Incident Situation Report (SITREP) as information becomes available. Click [HERE](#)
- ☐ Instruct the designated Floor Warden to collect the visitor log located at the receptionist desk – 19th floor. Additionally, all visitors will muster at the 19th floor rally point. We must ensure all visitors know this location upon signing into the log.
- ☐ Follow protocol for real-time operations when 6th floor requires evacuation with return less than four hours.
- ☐ Complete a post-incident report and send it to the ENGIE NA Health & Safety Directorate.

- ☐ NOTE: This BCP provides a Floor Warden List of the designated individuals and alternates by floor and a map listing the rally points for each floor. Click [HERE](#) for Floor Warden information.

Floor Warden Immediate Actions

- ☐ Assist ENGIE NA employees in the execution of “Alarm Response” immediate actions listed above.
- ☐ Pick up walkie-talkies and quickly move to the designed evacuation rally points.
- ☐ Prepare floor personnel to exit through designated exits and to listen for further notice instructions from Building Management.
- ☐ Write a post incident report and discuss any modifications to the original plan.
- ☐ Floor Warden points of contact are found in Appendix P. Click [HERE](#).

WORKPLACE VIOLENCE AND SUSPICIOUS ACTIVITIES

IF YOU SEE SOMETHING, SAY SOMETHING”

Warning Signs of a Troubled Employee That May Lead to Workplace Violence

Current or former disgruntled employee
An angry customer, spouse, or relative of an employee
Terrorist threats
Disciplining or firing an employee
Employee abuse of drugs or alcohol
Harassment by co-workers
Mental illness
Work-related stress
Change in behavior patterns
Frequency and intensity of behaviors are disruptive to the work environment
Crying, sulking or temper tantrums

Excessive absenteeism or tardiness
 Pushing the limits of acceptable conduct based on reasonableness or disregarding the health & safety of others
 Disrespect for authority
 Increased mistakes or errors or unsatisfactory work quality Refusal to acknowledge job performance problems
 Faulty decision making Swearing or emotional language Handles criticism poorly
 Making inappropriate comments Forgetfulness, confusion and/or distraction Inability to focus
 Blaming others for mistakes
 Complaints of unfair personal treatment
 Talking about the same problems repeatedly without resolution Insistence that he/she is always right
 Social isolation
 Misinterpretation of communications from supervisors or co-workers Personal hygiene is poor or ignored
 Sudden and/or unpredictable change in energy level Complaints of unusual and/or non-specific illnesses
 Holds grudges, especially against his/her supervisor. Verbalizes hope that something negative will happen to the person against whom he/she has the grudge.

Physical Signs of a Troubled Employee

Flushed or pale face Sweating
 Pacing, restless or repetitive movements Signs of extreme fatigue
 Trembling or shaking Clenched jaws or fists
 Exaggerated or violent gestures Change in voice
 Loud talking or chanting Shallow, rapid breathing
 Scowling, sneering or use of abusive language Glaring or avoiding eye contact
 Violating one's personal space (too close)

Other Warning Signs that May Lead to Workplace Violence

Threatening behavior: States intention to hurt someone; holds grudges; excessive behavior (e.g. phone calls, gift giving); escalating threats that appear well-planned; preoccupation with violence
 History of violence: Fascinated with incident of workplace violence; shows extreme interest in, or obsession with, weapons; demonstrated violence towards inanimate objects; evidence of earlier violent behavior
 Intimidating behavior: Argumentative or uncooperative; displays unwarranted anger; impulsive or easily frustrated, challenges peers and authority figures
 Increase in personal stress: An unreciprocated romantic obsession; serious family or financial problems; recent job loss or personal loss
 Negative personality characteristics: Suspicious of others; believes he/she is entitled to something; feels victimized; low self-esteem
 Marked changes in mood or behavior: Extreme or bizarre behavior, irrational beliefs and ideas; appears depressed or expresses hopelessness or heightened anxiety; marked decline in work performance; demonstrated a drastic change in belief system
 Socially isolated: History of negative interpersonal relationships; few family or friends; sees the company as a "family"; has an obsessive involvement with his/her job

Immediate Actions in Response to Observed Behaviors and Suspicious Activities

Complete an incident Situation Report (SITREP) [Click here](#) upon sighting behavioral and/or suspicious activity concerns and deliver to your immediate supervisor;

Supervisors report behavioral concerns to the Human Resources Directorate Service Center @ 713-636-1109 and suspicious activities to the EOC. Service Center may seek advice from the Employee Assistance Program (EAP) for appropriate actions. In the event of an injury due to workplace violence, follow the ACCIDENT OR ILLNESS Emergency Procedure.