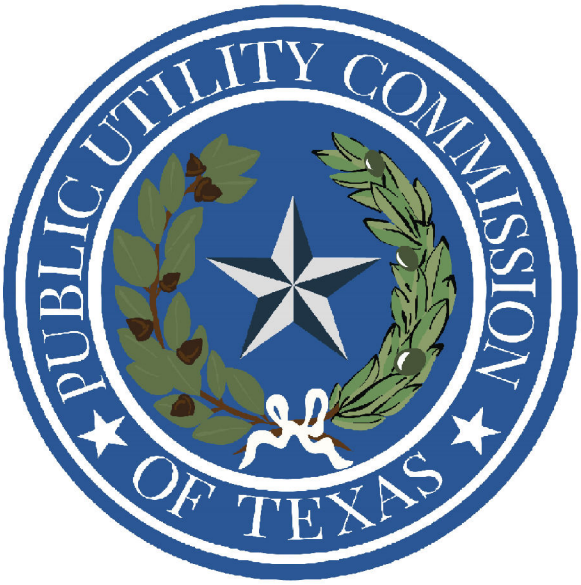


# Filing Receipt

**Received - 2022-04-18 02:30:33 PM**
**Control Number - 53385**
**ItemNumber - 335**

BROAD REACH POWER

Broad Reach Power
Emergency Operations Plan Executive Summary

## Executive Summary:

As a registered power generation company ("PGC"), Broad Reach Power is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. Broad Reach Power has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) concurrently with submission of its PGC application if it is a new facility that has not achieved commercial operations, (b) for calendar year 2022, by April 18th if it has been granted PGC approval by that time (as the April 15, 2022 deadline has been extended by the Commission), or (c) beginning in 2023, annual updates to the EOP must be filed by March 15th in the circumstances outlined by § 25.53(c)(3). At all times, the most recent approved copy of the Broad Reach Power Emergency Operations Plan must be available at the Broad Reach Power's main office for PUCT inspection.

For Broad Reach Power, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

- **(d)(1)(A-D) Approval and Implementation (p. 1)** Section that:
    - Introduces the EOP and outlines its applicability;
    - Lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;
    - **Provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to** § 25.53(c)(1); and
    - **States the date the EOP was most recently approved by the PGC.**
- **(d)(2)(B) Communication Plan (p. 2)** describing the procedures during an emergency for communicating with the media; the PUCT; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances of the PGC; and the applicable reliability coordinator
- **(d)(3) Plan for Maintenance of Pre-identified Supplies (p. 5)** for Emergency Response
- **(d)(4) Plan that Addresses Staffing (p. 5)** during Emergency Response
- **(d)(5) Plan that Addresses how the PGC identifies weather-related hazards (p. 6)**, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the PGC follows to activate the EOP

- (c)(4)(B) List of primary and, if possible, backup emergency contacts (p. 1)

- (c)(1)(A)(i)(IV) and (c)(4)(C) Affidavit from the PGC's highest-ranking representative, official, or officer with binding authority over the PGC stating the following:
    - 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;
    - The EOP has been reviewed and approved by the appropriate executives;
    - Drills have been conducted to the extent required by subsection (f) of the rule;
    - The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
    - The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
    - The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training

- Annexes to be included in the EOP - A PGC must include
    - (e)(2)(A) Weather emergency annex (p. 7) that includes
        - Operational plans for responding to a cold and hot weather emergency, distinct from the weather preparations required under § 25.55
        - Verification of the adequacy and operability of fuel switching equipment, if installed; and
        - A checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency
    - (e)(2)(B) Water shortage annex (p. 8) that addresses supply shortages of water used in the generation of electricity;
    - (e)(2)(C) Restoration of service annex (p. 8) that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;
    - (e)(2)(D) Pandemic and epidemic annex (p. 8);
    - (e)(2)(E) Hurricane annex (p. 8) that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
    - (e)(2)(F) Cyber security annex (p. 8);
    - (e)(2)(G) Physical security incident (p. 8) annex; and
    - (e)(2)(H) Any additional annexes as needed or appropriate to the entity's particular circumstances
- Drills


As a registered PGC, it is Broad Reach Power's intent to fully comply with all drill requirements and expectations of the Public Utility Commission of Texas as outlined in § 25.53(f).

## Record of Distribution:

Pursuant to § 25.53(c)(1)(A)(III) and (c)(4)(A), Broad Reach Power will provide access to and training on the EOP during the week of April 18, 2022.

## Affidavit:

Broad Reach attaches the affidavit required by § 25.53(c)(1)(A)(i)(IV) and (c)(4)(C), signed by Steve Vavrik, its highest-ranking representative, official, or officer with binding authority over Broad Reach Power.

# AFFIDAVIT

STATE OF TEXAS §
§
COUNTY OF HARRIS §

Before me, the undersigned notary public, on this day personally appeared Steve Vavrik, 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 Steve Vavrik. I am over the age of eighteen and am a resident of the State of Virginia. 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 Broad Reach Power LLC ("BRP").

2 I swear or affirm that in my capacity as Chief Executive Officer of BRP, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed into Project No. 53385.

3. I further swear or affirm that I have personal knowledge of the facts stated below:

- Relevant operating personnel are familiar with and will receive training the week of April 18, 2022 on the applicable contents and execution of the EOP, and such personnel will be 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;
- The EOP has been reviewed and approved by the appropriate executives;
- The EOP or an appropriate summary will be distributed to local jurisdictions as needed;
- BRP maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and

4. BRP intends to conduct a drill consistent with subsection (f) of PUC Subst. R. § 25.53 by June 15th, 2022, and will provide notice to the Commission at least 30 days before that drill is conducted. Once that drill is conducted, BRP will notify the Commission.

5. BRP intends for emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training by June 15th, 2022. Once the training is completed, BRP will notify the Commission.

6. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief."

Further affiant sayeth not.

[Name] Steve Vavrik
[Title] Chief Executive Officer
[Entity] Broad Reach Power LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 14 day of April 2022.

ELIZABETH M. BURNS
Notary Public, State of Texas
Comm. Expires 03-24-2025
Notary ID 126654529

Notary Public in and for the
State of Texas

My Commission Expires: 03-24-2025

BROAD REACH POWER

# Emergency Operations Plan

## Broad Reach Power LLC

Power Generation Company (PGC)

Version 1.0
Effective Date: 04/18/2022

BROAD REACH POWER

## Contents

BROAD REACH POWER

## Approval and Implementation

This Emergency Operations Plan (EOP) is developed to help ensure Broad Reach Power's continued power generation operations in the event of emergency conditions, including, but not limited to pandemic(s) or severe weather. This plan includes the necessary elements, pursuant to PUCT Rule §25.53. This EOP is applicable to PGC Registration No. 20555, and is therefore applicable to all generation resources attributable thereto. This EOP will also be applicable to any future generation resources added to Broad Reach Power's PGC registration as approved by the Commission.

The following individuals are responsible for maintaining, implementing, and revising the EOP.

| Name | Title | Permission(s) |
|---|---|---|
| Luke Butler | Sr. Associate, Asset Management | Maintain |
| Mike Dubois | Manager of Real-time Operations | Implement |
| Luke Butler | Sr. Associate, Asset Management | Revise |

## Revision Control History

| Version | Approval Date | Effective Date | Revision Summary |
|---|---|---|---|
| 1.0 | 04/15/2022 | 04/18/2022 | Initial Emergency Operations Plan |

***As of 04/18/2022, EOP Version 1.0, most recently approved on 04/15/2022, supersedes all previous EOPs.***

## Emergency Contacts

The following primary and backup emergency contacts are those who can immediately address urgent requests and questions from the Commission during an emergency:

Primary:

- Steve Vavrik, Chief Executive Officer, svavrik@broadreachpower.com, 401-497-7566
- Doug Moorehead, Chief Operating Officer, dmoorehead@broadreachpower.com, 757-328-3309

Backup:

- Narsimha Misra, Chief Commercial Officer, nmisra@broadreachpower.com, 832-458-2831

## Communication Plan

During emergency operations, Broad Reach Power (BRP) will use the contact information provided in the table below. Please see Attachment C, Emergency Staffing Schedule, for a list of BRP internal contact information.

| EMERGENCY OPERATIONS CONTACT LIST (EXTERNAL) | | |
|---|---|---|
| NAME | ENTITY | PHONE NUMBER |
| Shift Supervisor | ERCOT | 512-248-3105 |
| QSE Agent | APX | 408-878-1852 |
| PUCT Infrastructure Staff | PUC | 512-936-7197 |
| OPUC | OPUC | 512-936-7500 |
| TNMP Real-time Operations | TNMP | 281-581-4762 |
| LCRA Real-time Operations | LCRA | 800-223-7622 |
| AEP Real-time Operations | AEP | 866-871-3479 |
| CPS Real-time Operations | CPS | 210-353-4362 |
| STEC Real-time Operations | STEC | 361-485-6300 |
| Oncor Real-time Operations | Oncor | 214-743-6897 |

Additionally, BRP will use the following procedures for communicating with the specified entities during an emergency:

- **Media**: BRP Legal department will review and coordinate all incoming and outgoing media communications.
- **PUCT**: The identified BRP contacts listed in the section "Emergency Contacts" are those who can immediately address urgent requests and questions from the Commission during an emergency. If further information or review is required during this communication, the identified Emergency Contacts can request BRP Legal department to initiate and coordinate with the appropriate departments. The BRP Legal department will then serve as the point of contact for the remainder of that specific request.
- **OPUC**: BRP Legal department will review and coordinate all incoming and outgoing communications to OPUC.
- **Fuel Suppliers**: Not applicable as all current BRP assets do not consume fuel in the context of this question. All BRP assets are Energy Storage Resources that receive energy from the distribution/transmission electrical grid.
- **Local and State Governmental Entities, Officials, and Emergency Operations Centers**: Depending on the urgency of the situation, communications with Local and State Governmental Entities, Officials, and Emergency Operations Centers may first be initiated by BRP Field Services or BRP remote real-time operations personnel using Attachment J "BRP Site Address and Emergency Phone Numbers". For non-urgent

communication, BRP Field Services may communicate the issue with BRP Asset Management, who will then utilize Attachment J and serve as point of contact for the remainder of the specific request.

- **ERCOT**: BRP real-time operations will serve as the point of communication with ERCOT.

## Definitions and Acronyms

| TERM | ACRONYM | DEFINITION |
|---|---|---|
| Annex | | A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat. |
| Drill | | An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills. |
| Electric Reliability Council of Texas | ERCOT | Independent System Operator for approximately 90% of the state of Texas. |
| Emergency | | A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity. |
| Entity | | An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT. |
| Hazard | | A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service. |
| Power Generation Company | PGC | Generates electricity intended to be sold at wholesale and does not own a transmission or distribution facility in this state (with some exceptions, see PUC Substantive Rule 25.5(23) and 25.5(45)). |

| | | |
|---|---|---|
| Public Utility Commission of Texas | PUCT | The PUCT is the regulatory body for energy entities in the state of Texas. |
| Qualified Scheduling Entity | QSE | Submit bids and offers on behalf of resource entities (REs) or load serving entities (LSEs) such as retail electric providers (REPs). |
| State Operations Center | SOC | The SOC is operated by TDEM on a 24/7 basis and serves as the state warning point. |
| Texas Department of Energy Management | TDEM | coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters. |
| Threat | | The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service. |

## Purpose and Filing Requirements

As a registered PGC, in the ERCOT footprint, Broad Reach Power (BRP) is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. As such, BRP has developed this plan to comply with the PUCT Substantive rule, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) concurrently with submission of its PGC application if it is a new facility that has not achieved commercial operations, (b) for calendar year 2022, by April 18th if it has been granted PGC approval by that time (as the April 15, 2022 deadline has been extended by the Commission), or (c) beginning in 2023, annual updates to the EOP must be filed by March 15th in the circumstances outlined by § 25.53(c)(3). At all times, the most recent approved copy of the BRP Emergency Operations Plan must be available at the main office for PUCT inspection.

## Asset Design and Operations

All current Broad Reach Power (BRP) assets share similar designs with respect to weather preparedness and temperature control. As built, these assets have many qualities that allow for exceptional extreme-weather performance. These include:

1. Our onsite generation equipment (battery modules) is thermally isolated/protected and temperature regulated by a 24/7 enclosed HVAC system.
2. Our assets do not have weather exposed fuel or generation components
3. Our assets are built to perform at rated capacity in operating ambient temperatures of -13F to 113F.
4. Where applicable, our assets are built on raised platforms above pertinent floodplains.
5. All BESS installations are remotely monitored and operated.

## Maintenance of Pre-identified Supplies for Emergency Response

As described in the Asset Design and Operations section, Broad Reach Power (BRP) assets are remotely monitored, operated and designed such that procurement of additional emergency supplies is limited to spare parts that have historically required periodic replacement. A list of some of these supplies is contained below.

- Fuses
- Communication connectivity devices such as wiring and adapters
- Local controller relays
- Other miscellaneous parts that have historically required periodic replacement

## Staffing During Emergency Response

Broad Reach Power (BRP) shall identify operational and management staff that will remain on call or on stand-by for the duration of the emergency (Attachment C). This list may be dynamic and will be subject to change should conditions warrant it.

Critical business functions are those functions and critical activities that BRP must maintain in a continuity situation, when there has been a disruption to normal operations, in order to sustain the mission of the organization. They are the backbone of business and must be continued in order for BRP to continue to meet its mission. Refer to Attachment E for a description of these critical business functions

In the case of a weather emergency that requires evacuation of the Houston real-time operations control-center, BRP maintains a “go-box” that contains additional monitors and a wireless hotspot so that control-room personnel can remotely work from anywhere in the United States. The primary contact number for BRP control-room operations is a web-based number that only requires an internet connection, therefore communication channels with external entities is maintained. This scenario has been tested and proved effective.

## Weather-related Hazard Identification and EOP Activation

Broad Reach Power (BRP) staff shall actively monitor all potential extreme weather events that may affect their facilities, to include severe weather and operational circumstances arising from those events. BRP uses a variety of services that provide monitoring and alerting capabilities for extreme weather conditions on a 24/7 basis, including Accuweather Pro, Windy.com, and Stormvista. These services provide appropriate monitoring capability for tornado, hurricane, extreme hot weather, extreme cold weather, drought, and flooding conditions.

Hurricane or tropical storm. Notifications can be called when there is a probability of landfall in the ERCOT Region. ERCOT Meteorologist will provide the forecasts to supplement other Weather Service data information. ERCOT's operations support and Outage Coordination will analyze the situation and make recommendations as to Resource requirements and transmission topology.

Extreme Cold Weather. Extreme cold weather notifications can be issued when temperatures are forecasted to be 25 degrees (Fahrenheit) or below in the North Central and in the South-Central weather zones. Wind chill also has an impact on how the temperature feels due to the flow of lower temperature air. When the wind chill is forecasted to be 20 degrees or below in the North Central and in the South-Central weather zones, a notification may be issued. For such events, additional reserves may be necessary and the sequence of actions and/or notifications may vary due to system conditions or other operational issues.

Extreme Hot Weather. Extreme hot weather notifications can be issued when temperatures are forecasted to be 103 degrees (Fahrenheit) or above in the North Central and South-Central weather zones. Notifications can also be issued when temperatures are forecasted to be 94 degrees or above in the North Central and South-Central weather zones during the following months (October-May). For such events, additional reserves may be necessary and the sequence of actions and/or notifications may vary due to system conditions or other operational issues.

Other Significant Weather Events. Significant weather events are those that do not meet the criteria of the extreme hot, extreme cold, hurricane, or tropical storm procedures. Significant weather events can consist of, but are not limited to the following:

(1) Tornadoes
(2) Strong straight-line winds
(3) Hail
(4) Severe lightning
(5) Flooding

(6) Freezing precipitation
(7) Hard freeze

Upon notification of an ERCOT declared OCN for approaching extreme weather conditions, BRP will initiate an internal notification and briefing with those listed in the Emergency Staffing Schedule. The BRP internal briefing will include a review of potential impacts and a decision on EOP activation.

## Annexes Required for a Power Generation Company

The following annexes must be included in the Emergency Operations Plan for a Power Generation Company.

### Weather Emergency Annex

As described in the Asset Design and Operations section, Broad Reach Power (BRP) assets are built such that urgent preparation in response to an approaching weather-related event is not necessary. However, BRP provides the following information on its cold and hot weather emergency prevention and operation measures.

**Prevention:** BRP conducts monthly inspections and maintenance of all assets to ensure proper function of HVAC systems and structure integrity.

The BRP maintenance schedule also includes inspection and preventative maintenance of critical medium-voltage and high-voltage transmission equipment on a monthly, quarterly, and triennial basis, including:

- Medium and High Voltage Transformers
- Disconnect Switches
- Reclosers and circuit breakers
- Potential and Current Transformers
- Lightning Arrestors
- Pad Mounted Transformers
- Underground cables

**Operation:**

- Visual inspections of key systems monthly. While we already perform monthly visual inspections, we have prepared for added inspections in the leadup to any extreme weather event.

- 24/7 cell temperature monitoring. Our operations group is able to monitor internal cell temperatures in real time and can deploy a proprietary response if temperatures approach or breach acceptable limits.

### A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels

Not applicable as Broad Reach Power (BRP) assets are not capable of utilizing alternative fuel.

### Checklist(s) for generating facility personnel to address emergency events

Not applicable as all Broad Reach Power (BRP) assets are remotely operated.

### A water shortage annex that addresses supply shortages of water used in the generation of electricity;

Not applicable as Broad Reach Power (BRP) assets do not use water to generate power.

### A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;

The Broad Reach Power (BRP) plan for emergency operation addresses its process for recovering generation capacity, should an emergency force a derate, a unit trip, or inability to generate and fulfill its MW obligations. These actions are listed in Attachment D.

### A pandemic and epidemic annex;

The Broad Reach Power (BRP) Pandemic Response Plan (Attachment F) contains this information.

### A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;

The Broad Reach Power (BRP) Hurricane Plan (Attachment K) contains this information.

### A cyber security annex;

The Broad Reach Power (BRP) Cyber Security Incident Response Policy (Attachment G) contains this information.

### A physical security incident annex;

This section contains reporting for physical threats to any Broad Reach Power (BRP) facility, as well as actual damage to or destruction of any BRP facility, per NERC Reliability Standard EOP-004. The DOE digital form, OE-417 shall be used to communicate physical attacks and cyber security incidents.

The BRP Cyber Security Incident Response Policy (Attachment G) contains this information.

## PUC Filing Requirements

An entity must file an emergency operations plan (EOP) and executive summary by April 15, 2022.

A. An entity must file with the commission:
   i. an executive summary that:
      I. describes the contents and policies contained in the EOP;
      II. includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
      III. includes the record of distribution required under paragraph (4)(A) of this subsection; and
      IV. contains the affidavit required under paragraph (4)(C) of this subsection; and
   ii. a complete copy of the EOP with all confidential portions removed.

B. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.

C. In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:
   i. A record of distribution that contains the following information in table format:
      I. titles and names of persons in the entity's organization receiving access to and training on the EOP; and
      II. dates of access to or training on the EOP, as appropriate.
   ii. A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
   iii. An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
      I. 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;
      II. the EOP has been reviewed and approved by the appropriate executives;
      III. drills have been conducted to the extent required by subsection (f) of this section;

IV. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
V. the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
VI. the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

## Annual Review

An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

A. An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:
    a. file with the commission an executive summary that:
        i. describes the changes to the contents or policies contained in the EOP;
        ii. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
        iii. includes the record of distribution required under paragraph (4)(A) of this subsection; and
        iv. contains the affidavit required under paragraph (4)(C) of this section;
    b. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
    c. submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.
B. An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:
    a. a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;
    b. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and
    c. the affidavit described under paragraph (4)(C) of this subsection.

## Annual Drill

An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity 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. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, 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. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

By applying the Emergency Operations Drill Instructions and completing Attachment B, Broad Reach Emergency Operations Plan shall be tested each year, no later than February 15th, and includes a review section, to identify and correct any vulnerabilities in the Emergency Operations Plan. Broad Reach Emergency Operations Drill Procedure has a section dedicated to any generation facility that is located within a defined hurricane evacuation zone.

Broad Reach, as a registered RE, shall provide ERCOT with any updated versions of their emergency operations plan by **June 1** *for any updates made between November 1 and April 30*, and by **December 1** *for any updates made between May 1 through October 31*. Broad Reach shall submit all updated plans electronically.

## ATTACHMENT B - EMERGENCY OPERATIONS DRILL
### Section 2.2.1

BROAD REACH POWER

| ACTION ITEM | NAME | TASK | COMPLETE | DATE | NOTES |
|---|---|---|---|---|---|
| 1 | | | | | |

**VULNERABILITIES AND ISSUES IDENTIFIED & CORRECTIVE ACTIONS**

| ACTION ITEM | NAME | CORRECTIVE ACTION TASK | COMPLETE | DATE | NOTES |
|---|---|---|---|---|---|
| 1 | | | | | |

## ATTACHMENT C - EMERGENCY STAFFING SCHEDULE

BROAD REACH POWER

| NAME | LOCATION | CONTACT INFORMATION | DUTIES |
|---|---|---|---|
| Mike Dubois | Houston - Remote Office | 412-527-1780 | Real-time Operations and Dispatching |
| Carlis Miller | Houston - Field Services | 832-287-0029 | Field Services |
| Gabriel Roy Liguori | Houston - Remote Office | 617-633-2080 | Asset Management |
| Cody Morgan | Houston - Remote Office | 325-829-7309 | IT |
| Casey Kopp | Houston - Remote Office | 585-748-9378 | Trading |
| Guillaume Dufay | Houston - Remote Office | 346-561-4123 | Asset Management |
| Doug Moorehead | Houston - Remote Office | 757-328-3309 | Asset Management |
| Ashley Waggoner | Houston - Remote Office | 785-979-1544 | Human Resources |
| Sally Shaw | Houston - Remote Office | 713-962-3719 | Legal |
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## ATTACHMENT E - GENERATION CAPACITY RECOVERY PRIORITIES
## Section 2.1.1.10

BROAD REACH POWER

| ID | ASSIGNED TO | TASK | COMPLETE | DATE | NOTES |
|---|---|---|---|---|---|
| 1 | Real-time operations | Review and log all alarms and fault codes | | | |
| 2 | Real-time operations | Determine if site can be safely restored remotely. If yes, skip to ID 10. If site cannot be safely restored remotely, continue with ID 3. | | | |
| 3 | Real-time operations | Contact Field Service Personnel to evaluate mobilization to site. | | | |
| 4 | Field Service Personnel | Upon arrival at site, assess situation and determine if personnel can safely enter the site. Contact appropriate local emergency services if safe entry cannot be confirmed. Communicate situation with Real-time operations. If safe to access site, proceed to ID 6. If unsafe to enter, continue with ID 5. | | | |
| 5 | Field Service Personnel | If unsafe to enter, implement Emergency Contact Plan for site. After arrival and assessment by emergency contact, confirm and communicate all-clear with Real-time Operations before proceeding to next step. | | | |
| 6 | Field Service Personnel | Contact Real-time Operations prior to site entry. | | | |
| 7 | Real-time operations | Clear Field Service Personnel to enter site. | | | |
| 8 | Field Service Personnel | Review on-site alarms, fault codes, and physical state of asset and determine plan of action. | | | |
| 9 | Field Service Personnel | Communicate action plan with Real-time operations. Implement after communicated. | | | |
| 10 | Real-time operations | Before restoring site, communicate restoration plan with connecting TDSP, QSE agent, and ERCOT. | | | |
| 11 | Real-time operations | Restore site and confirm valid communication with site. | | | |
| 12 | Real-time operations | Confirm restoration with TDSP, QSE agent, and ERCOT. | | | |

| Broad Reach Power Company Critical Business Function | | | |
|---|---|---|---|
| **Critical Business Function 1:** Monitoring and Dispatching Assets | | | |
| **Business Process To Complete:** Monitor and dispatch assets to meet market obligations | | | |
| **Supporting Elements** | | | |
| **Supporting Activities (Describe)** | **Lead POC**<br>**Alternate** | **Vendors and External Contacts** | **Maximum Allowed Down Time**<br>**Criticality** |
| **Monitor and dispatch** | **Manager, Real-time Operations** | **APX (QSE Agent)** | **0** |
| | **Associate, Real-time Operations** | | **High** |
| **Communication with TDSPs and ERCOT** | **Manager, Real-time Operations** | **APX (QSE Agent)** | **0** |
| | **Associate, Real-time Operations** | | **High** |
| **Internal Communication** | **Manager, Real-time Operations** | **N/A** | **0** |
| | **Associate, Real-time Operations** | | **High** |
| **Implications if not Conducted:** Interruption and/or loss of this function would disrupt ability to control assets and meet market obligations. This could lead to compliance and market penalities. | | | |
| **Calendar Dependent:** This function is always occurring. | | | |
| **Required Resources:** Staff, equipment, supplies, Information Technology, and other resources Broad Reach maintains a "go-box" that contains additional monitors and a wireless hotspot so that control-room personnel can remotely work from anywhere in the United States. This scenario has been tested and proved effective. | | | |
| **Facilities:** This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet. | | | |

| Broad Reach Power Company Critical Business Function | | | |
|---|---|---|---|
| **Critical Business Function 2:** Asset Management | | | |
| **Business Process To Complete:** Respond to troubleshooting/repair requests from real-time operations | | | |
| **Supporting Elements** | | | |
| **Supporting Activities (Describe)** | **Lead POC**<br>**Alternate** | **Vendors and External Contacts** | **Maximum Allowed Down Time**<br>**Criticality** |
| **Troubleshooting Coordination** | **Manager, Asset Management** | **Saber**<br>**CAMS**<br>**NAES** | **0** |
| | **Associate, Asset Management** | | **High** |
| **Field Services** | **Associate, Asset Operations** | **Saber**<br>**CAMS** | **0** |
| | **Associate, Asset Operations** | **NAES** | **High** |
| **Implications if not Conducted:** Interruption and/or loss of this function would disrupt ability to maintain assets online through troubleshooting conditions. Furthermore, it would result in a delay of the capability to bring assets back online after tripping or faults. | | | |
| **Calendar Dependent:** This function is always occurring. | | | |
| **Required Resources for Troubleshooting Coordination:** Staff, equipment, supplies, Information Technology, and other resources.<br>**Required Resources for Field Services:** Staff, field service equipment, supplies, Information Technology, and other resources. | | | |
| **Facilities for Troubleshooting Coordination:** This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet.<br>**Facilities for Field Services:** N/A as work is done in the field at asset location. | | | |

| Broad Reach Power Company Critical Business Function | | | |
|---|---|---|---|
| **Critical Business Function 3:** Trading | | | |
| **Business Process To Complete:** Submit Day-Ahead Market bids | | | |
| **Supporting Elements** | | | |
| **Supporting Activities (Describe)** | **Lead POC** | **Vendors and External Contacts** | **Maximum Allowed Down Time** |
| | **Alternate** | | **Criticality** |
| **Daily Bid Submission** | **Manager, Trading** | **APX (QSE Agent)** | **1** |
| | **Associate, Trading** | | **Med** |
| **Implications if not Conducted:** *Interruption and/or loss of this function would disrupt ability to submit Day-Ahead Market bids and receive awards.* | | | |
| **Calendar Dependent:** This function is always occurring. | | | |
| **Required Resources:** Staff, equipment, supplies, Information Technology, and other resources. | | | |
| **Facilities:** This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet. | | | |

| Broad Reach Power Company Critical Business Function | | | |
|---|---|---|---|
| **Critical Business Function 4:** Information Technology | | | |
| **Business Process To Complete:** Maintain and troubleshoot network connectivity for all critical business functions | | | |
| **Supporting Elements** | | | |
| **Supporting Activities (Describe)** | **Lead POC** | **Vendors and External Contacts** | **Maximum Allowed Down Time** |
| | **Alternate** | | **Criticality** |
| **Network Maintenance Troubleshooting** | **Director, Critical Asset Operations** | **Triumphus** | **0** |
| | **Associate, Network and Cyber Security** | | **High** |
| **Implications if not Conducted:** Interruption and/or loss of this function would disrupt ability for all critical business functions. | | | |
| **Calendar Dependent:** This function is always occurring. | | | |
| **Required Resources:** Staff, equipment, supplies, Information Technology, and other resources. | | | |
| **Facilities:** This function can be completed through a work-from-home setting with a standard office space with traditional office equipment and space for phon | | | |

BROAD REACH POWER

# Pandemic Response Plan

## Broad Reach Power LLC

Power Generation Company (PGC)

Version 1.0
Effective Date: 04/18/2022

BROAD REACH POWER

## Contents

BROAD REACH POWER

# Executive Summary and Approval

**Introduction:**

In light of recent responses to pandemics and epidemics, Broad Reach Power (BRP) has developed this plan (PRP) to address the subject of business continuity, in the face of a widespread medical event, such as a pandemic or an epidemic. This Plan provides a framework, guidance, and concept of operations to support BRP's efforts to continue and/or rapidly restore critical business functions in the event of a disruption to normal operations. This plan includes an overview of continuity operations, outlines the approach for supporting BRP's critical business functions, and defines the roles and responsibilities of staff. It also outlines the orders of succession, notification procedures and communication methods, plan activation and deactivation protocols, provisions for alternate work locations, and the plan for maintaining and restoring access to vital records.

This plan establishes procedures and processes to maintain operational continuity for businesses based on the loss of services due to a reduction in workforce (e.g., during pandemic influenza).

The following individuals are responsible for maintaining, implementing, and revising the PRP.

| Name | Title | Permission(s) |
|---|---|---|
| Luke Butler | Sr. Associate, Asset Management | Maintain |
| Mike Dubois | Manager of Real-time Operations | Implement |
| Luke Butler | Sr. Associate, Asset Management | Revise |

| Version | Approval Date | Effective Date | Revision Summary |
|---|---|---|---|
| 1.0 | 04/15/2022 | 04/18/2022 | Initial Pandemic and Epidemic Response Plan |

***As of 04/18/2022, PRP Version 1.0, approved on 04/15/2022, supersedes all previous PRPs.***

BROAD REACH POWER

## Introduction

**Overview:**

Continuity of Operations planning ensures Broad Reach Power (BRP) is able to continue or quickly resume performing critical business functions, which are the functions that support the organization's mission, comply with legal requirements, and support life-safety, under all circumstances, to the extent possible. The benefit of this planning includes the ability to anticipate response actions following a pandemic or epidemic, improve the performance of its generating and operations facilities, and ensure timely recovery.

**Plan Scope & Applicability:**

The BRP Pandemic Response Plan (PRP) is applicable once the safety of employees, customers, and guests has been verified. It can be active during normal business hours and after hours, with and without warning.

**Plan Objectives:**

The objective of the BRP PRP is to facilitate the resumption of critical operations and functions in a timely and organized manner to ensure a viable and stable organization. In doing this it is critical to ensure the safety and well-being of employees, customers, and guests. The primary objectives of the plan are to:

- Maintain Critical Business Functions during the pandemic or epidemic
- Adjust business functions to address staffing issues
- Ensure employees are able to perform work remotely, where applicable and appropriate

**Plan Assumptions:**

The following assumptions were used while creating this plan:

- An event has occurred that affects normal business operations.
- Access to BRP facilities may be limited.
- Qualified personnel are available to continue operations.

## Critical Business Functions

**Overview:**

Critical business functions are those functions and critical activities that Broad Reach Power (BRP) must maintain in a continuity situation, when there has been a disruption to normal operations, in order to sustain the mission of the organization, comply with legal requirements and support life-safety. They are the backbone of business and must be continued in order for BRP to continue to meet its mission. Refer to **Attachment E of the BRP-EOP-1 Emergency**

**Operations Plan, Critical Business Functions**, for a description of these critical business functions

**Identification of Staff Required to Continue Business Operations:**
In the event of a pandemic or epidemic, work absences, due to medical issues attributed to the widespread medical event, can lead to dramatic decreases in productivity, potentially leading to the shutdown of facilities. To maintain the best possible operational posture, it is imperative to communicate duties to the appropriate personnel, helping to ensure BRP's facilities can remain operational to the greatest extent possible. In many cases, employees may log in remotely and perform their duties, fostering as much of an illness-free atmosphere possible, however, there will be the need for onsite staff to maintain and operate facilities, leading to the identification of mission essential staff and reporting structures. BRP senior management will identify those mission essential individuals and will communicate tasks to them. As each case may differ, there will be no "One-size-fits-all" approach, and each response to a pandemic or epidemic will require its own set of responsible personnel and tasks. It is imperative that all possible measures are taken to keep BRP staff from contracting or spreading the illness. Maintaining social distancing, where appropriate and possible, wearing proper PPE, and maintaining hygienic work and living spaces is crucial to combatting a widespread medical event. Depending on the nature of the event, the measures below may serve to facilitate the continued operations of BRP facilities:

- Wearing of PPE
  - Masks
  - Social distancing
  - Proper hygiene
  - Eye, face, or other protection (as applicable)
- Remote work, where appropriate and possible
- Encourage the use of approved medications and/or vaccine(s)

## Plan Activation Procedures

**Plan Activation During Normal Business Hours:**
If it is determined that the facility cannot be re-inhabited, the Business Owner or designee will inform personnel on next steps. Employees may be instructed to go home to await further instructions or move to an alternate site. Further communications, such as instructions on where and when to report for work will be made using communication methods such as email, phone calls, texts, or other communication methods.

**Plan Activation Outside Normal Business Hours:**

If an event occurs outside normal business hours that renders a facility uninhabitable, the Business Owner or designee will activate the PRP using email, phone calls, texts, or other communication methods.

**Actions upon Activation:**
Upon activation of the PRP, the Business Owner or designee will be responsible for notifying all affected personnel of their duties and where they will be performing those duties (remotely or at a site).

## Plan Deactivation Procedures

**Overview:**
PRP deactivation is the process of demobilizing the alternate facility and restoring critical business functions to the primary facility or a new facility that will permanently replace the damaged facility. Plan deactivation may not consist of an exact replacement of lost facilities, equipment or processes. The goal of plan deactivation is to reestablish full capability in the most efficient manner. In some continuity incidents, extensive coordination may be necessary to backfill staff, procure a new operating facility, and re-establish vital records. When it is determined the PRP activation has ended, all personnel should be informed that the necessity for continuity operations no longer exists and the return to normal operations will begin.

**Criteria for PRP Deactivation:**
The business owner or designee will determine, based on input from medical authorities, staff, or other entities when it is safe and when the organization is prepared to restore or transfer critical business functions to a facility for long term usage. Critical business functions must be restored in priority sequence based upon the classification and criticality of the function. The following elements are typically completed prior to plan deactivation.

- Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort.
- Temporarily suspend non-critical functions, as necessary, to support the resumption efforts.
- As applicable, utilize other personnel, such as contract personnel, to support the resumption efforts.

Table 1 details the restoration process that must be completed during plan deactivation.

**Table 1**

| Item | Function | Supplies | Required Resources |
|---|---|---|---|
| 1 | Monitor current CDC guidelines for indication of safe plan deactivation | N/A | HR in coordination with senior leadership will monitor CDC guidelines to determine when it is safe to restore critical business functions to standard operating locations. |
| 2 | Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort | Medical supplies, such as face coverings, hand washing stations, as well as proper arrangement of office seating to meet CDC guidelines for social distancing. | HR in coordination with senior leadership |
| 3 | Conduct return to normal operations briefing | N/A | HR coordinate and present briefing on return-to-work procedures with all employees |
| 4 | Continue to monitor CDC guidelines and adherence to latest revisions | N/A | HR in coordination with senior leadership will continue to monitor CDC guidelines and adjust procedures as needed. |


| Document Type: Policy |
|---|
| Broad Reach Power Cyber Security Incident Response Policy |

| Version Control | | | |
|---|---|---|---|
| Version # | Date | Content | Justification |
| 1.0 | 2021-10-22 | Initial Version | n/a |

| Prepared by: | Reviewed by: | Reviewed by: | Approved by: |
|---|---|---|---|
| Cody Morgan | Doug Moorehead | Sally Shaw | Steve Vavrik |
| Cody Morgan (Jan 4, 2022 10:16 CST) | W. Doug Moorehead (Jan 4, 2022 11:18 EST) | Sally Shaw (Jan 4, 2022 10:21 CST) | |
| Title: Director, Critical Asset Operations<br>Dpt.: Asset Management<br>Date: Jan 4, 2022 | Title: Chief Technology Officer<br>Dpt.: Engineering<br>Date: Jan 4, 2022 | Title: Executive Vice President Legal & General Counsel<br>Dpt.: Legal, Regulatory, Compliance & Policy<br>Date: Jan 4, 2022 | Title: Chief Executive Officer<br>Dpt.: Executive<br>Date: Jan 4, 2022 |

Table of Contents

## 1 Purpose

This policy defines Cyber Security Incident Responses for Broad Reach Power (BRP) and the entities governed by the NERC CIP Standards for Low-Risk ESS's.

BRP is committed to developing and maintaining a Cyber Security Incident response plan and to reporting Cyber Security Incidents to the Electricity Sector Information Sharing and Analysis Center (ES-ISAC). Any act or event that could be considered a Cyber Security Incident will be evaluated and reported as appropriate, in accordance with the steps outlined below.

## 2 Scope of Application

This policy applies to all BRP personnel (including contractors and service vendors) with authorized cyber or authorized unescorted physical access to covered Cyber Assets.

## 3 Definitions & Acronyms

- Roles and Definitions can be found in the BRP Master Definitions List.
- The use of any defined term will be capitalized.

## 4 Areas Involved

While no groups within BRP are exempt from this policy, the following groups have specific responsibilities and/or need to be familiar with the policy:

- Director of Information Technology
- IT Operations Manager
- IT Security Engineer
- Operation Center Manager
- SCADA Manager
- Help Desk
- Cyber Security Incident Response Team
- Cyber Security Senior Manager or Delegate

## 5 Compliance Requirements

### 5.1 Cyber Security Incident Response Plan

BRP shall develop, implement and maintain a Cyber Security Incident response plan in response to Cyber Security Incidents. This policy, along with the BRP Cyber Security Incident Response Procedure, serves as the BRP Cyber Security Incident Response Plan as called for by the NERC Cyber Security Standards for Low-Risk ESS's.

### 5.2 Cyber Security Incident Response Team

A Cyber Security Incident Response Team (CSIRT), comprised of the following members, will handle response to Cyber Security Incidents:

- Director of Information Technology (Lead)
  - Declares Cyber Security Incident as reportable to ES-ISAC
- IT Operations Manager
  - Notifies CSIRT of Cyber Security Incident
- IT Security Engineers
  - Primary technical advisor to the IT Operations Manager
  - Monitors systems and networks
  - Evaluates logs and other data and technical information to investigate the security incident
  - In an emergency situation may act to minimize damage to BRP systems before communicating with the IT Operations Manager
- CIP Senior Manager or Delegate
  - Perform oversight activities
  - Manage scheduling of periodic reviews
  - Schedule the annual test of the Cyber Security Incident Response Plan
- Sr. Manager, OPCENTER
  - Determine impact of the incident with regard to real-time system operations
  - Coordinate OPCENTER actions to minimize the impact to essential OPCENTER processes and applications

- SCADA Manager
  - Determine impact of the incident on OPCENTER applications and report to the Sr. Manager, OPCENTER

### 5.3 Discover

All BRP personnel will contact the Help Desk immediately if they suspect a cyber security incident.

### 5.4 Characterize, Classify, Resolve

CSIRT will use the ES-ISAC Reporting Cross Reference Matrix in Attachment A to determine the type and severity of an incident and whether or not the incident must be categorized as an ES-ISAC reportable incident. Each Cyber Security Incident will be categorized as either being a reportable incident or not.

Notification of the ES-ISAC, if needed, will be performed by the Director of Information Technology. The steps for doing so are specified in the BRP Cyber Security Incident Response Procedure.

### 5.5 Document

Cyber Security Incidents will be documented. Evidence will be preserved and protected per the BRP Cyber Security Incident Response Procedure. Documentation related to a defined reportable incident will be maintained for three calendar years. Non-reportable incident documentation will be maintained per the BRP Cyber Security Incident Response Procedure.

### 5.6 Review and Testing

The BRP Cyber Security Incident Response Policy and the BRP Cyber Security Incident Response Procedure will be reviewed annually. The policy, procedure and workflow will be tested annually. This test can take the form of a paper drill, tabletop exercise or full operational exercise and is to be scheduled by the CIP Senior Manager or delegate. This review and testing is detailed in the BRP Cyber Incident Response Annual Review and Testing Procedure.

In addition, the components of the Cyber Security Incident Response Plan will be updated and communicated to all CSIRT members within thirty (30) days of any changes, whether those changes are the result of an incident, a test or review.

Updates to the plan will be stored on a share point site to be identified later. All CSIRT members will be notified by email of the updates, and each CSIRT member will demonstrate that the member has reviewed the changes in the update.

## 6 Training Requirements

BRP will provide periodic training to new and existing personnel on their regulatory responsibilities. Training for the Cyber Security Incident Response Plan will be provided to the members of the CSIRT and to the document owners for the pieces of the plan. Additional training will be provided to response personnel as needs for capabilities as they are identified.

## 7 References

**7.1** NERC CIP-008-4 – Cyber Security – Incident Reporting and Response Planning

**7.2** BRP Cyber Security Incident Response Procedure

**7.3** BRP Cyber Incident Response Annual Review and Testing Procedure

## 8 Attachments

**8.1** Attachment A: ES-ISAC Reporting Cross Reference Matrix

# Attachment A – ES-ISAC Reporting Cross-Reference Matrix

*This cross-reference is provided for convenience. It is not intended to be inclusive.*

*Source: Appendix A from ES-ISAC's Threat and cyber security incident Reporting Guideline*

| Category | Sub-Category | Event Definition | Consider Reporting When: | Report Within: | Cross-Reference to Reporting Requirements |
|---|---|---|---|---|---|
| **SABOTAGE/ TAMPERING/ VANDALISM (STV) – Physical or Cyber** | Security Breaches: | | | | |
| | Physical Perimeter Compromise | Unauthorized access of a person or a device through, circumventing, or damaging the physical perimeter, or security systems protecting the physical perimeter. | Unauthorized physical access to facilities, systems, or equipment (such as critical assets or critical cyber assets) that could impact the reliable operation of the bulk electric system; or, intentional damage to security systems that protect the physical perimeter. | 1 hour of detection | |
| | Cyber Perimeter Compromise | Unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device. | Unauthorized electronic access to cyber assets whose impairment could impact the reliability of the | 1 hour of detection | |
| | Information Theft or Loss | Unauthorized removal or loss of sensitive information. | Sensitive information, such as that required to be protected pursuant to NERC Standard CIP-003 is lost or is removed without authorization. | 48 hours of detection | ES-ISAC |
| | Unauthorized Modification | Unauthorized addition or modification of software or data associated with the proper operation of cyber assets. | Malicious software or data modification is discovered on a cyber-asset or assets that may impact the reliability of the bulk power system. | 4 hours of detection | DHS<br>ES-ISAC |
| | Suspected Activities: | | | | |
| | Attempted Physical Intrusion | A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success. | Attempt to gain unauthorized physical access to facilities, systems, or equipment (such as critical assets or critical cyber assets) that could impact the reliable operation of the bulk power system is targeted, focused, or repetitive. | 6 hours upon detection | |
| | Attempted Cyber Intrusion | A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success. | Attempt to gain unauthorized electronic access to cyber assets (such as critical cyber assets) whose impairment could impact bulk power system reliability is targeted, focused, or repetitive. | 6 hours upon detection | |
| | Surveillance Activities – Intelligence Gathering: | | | | |

| | | | | |
|---|---|---|---|---|
| Social Engineering | The attempt by an unauthorized person to manipulate people into performing actions or divulging information. | Suspected or actual instance occurs. | 8 hours of recognition | DHS<br>ES-ISAC |
| Photography | Taking still or moving pictures. | A suspicious cyber security incident occurs. | 8 hours | DHS<br>ES-ISAC |
| Observation | Showing unusual interest in a facility; for example, observing it through binoculars, taking notes, drawing maps, or drawing structures of the facility. | Activity is suspicious or unauthorized. | 8 hours | DHS<br>ES-ISAC |
| Flyover | Flying an aircraft over a facility; this includes any type of flying vehicle including an unmanned aerial vehicle (UAV) loitering over a site. | A suspicious or unauthorized cyber security incident occurs. | 8 hours | DHS<br>ES-ISAC |
| Threats: | | | | |
| Expressed Threat | Communicating a threat. | Threatened action has the potential to damage or compromise a facility or personnel. | 1 hour | DHS<br>ES-ISAC |
| Weapons Discovery | Discovery of explosives. | Discovery occurs at or near a facility. | 1 hour | ES-ISAC |
| Attacks: | | | | |
| Actual Attack (Physical or Cyber or Communication) | Attack via physical, cyber, or communications means. | An actual attack against generation, transmission, or company-owned or operated communication facilities, cyber assets, or personnel occurs. | 1 hour | |
| Attempted Attack (Physical or Cyber or Communication) | Attack via physical, cyber, or communications means. | A suspected attack against generation, transmission, or company-owned or operated communication facilities, cyber assets, or personnel occurs. | 6 hours | |

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Odessa Southwest BESS

Odessa, Texas
3434 South Fulton Ave, Odessa, Texas 79766
31.799862875452295, -102.39110382549114

**Fire Department**
Odessa Fire Rescue (8 Min away)
1100 West 2nd St.
Odessa, Texas 79763
325-347-6363

**Alternate Fire Department**
City of Odessa Fire Station 5 (17 min away)
7155 Eastridge Rd.
Odessa, Texas 79765
325-657-4283

**Police Department**
Odessa Police Department (10 min away)
205 North Grant Ave
Odessa, Texas 79761
432-333-3641

**Alternate Police Department**
Midland Police Department (37 Min Away)
601 North Loraine St
Midland, Texas 79701
432-685-7108

**Hospital**
Medical Center Hospital (11 min away)
500 west 4th Street
Odessa, Texas 79761
830-997-4353

**Alternate Hospital**
Odessa Regional Medical Center (1 hr. away)
520 East 6th Street
Odessa, Texas 79761
432-582-8000

**Utility Service**
Oncor Electric
301 South Dixie Blvd
Odessa, Texas 79761
1-888-313-6862

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Alvin

760-A Heights Road
Alvin, Texas 77511
29.43324513387022, -95.2493669581114

**Fire Department**
Alvin Fire Department (2 min away)
110 Medic Ln
Alvin, Texas 77511
281-585-8536

**Alternate Fire Department**
Friendswood Fire Department (7 min away)
2605 West Parkwood Ave
Friendswood, Texas 77546
281-992-9494

**Police Department**
Alvin Police Department (5 min away)
1500 South Gordon St.
Alvin, Texas 77511
281-388-4370

**Alternate Police Department**
Manvel Police Department (11 min away)
6615 Masters
Manvel, Texas 77578
281-489-1212

**Hospital**
UTMB Health League City Campus Hospital
(23 min away)
2240 Gulf Fwy South
League City, Texas 77573
409-772-1010

**Alternate Hospital**
**UTMB Health (30 min away)**
2660 Gulf Fwy South #6
League, City, Texas 77573
832-505-2250

**Utility Service**
TNMP
2641 Hwy 6
Alvin, Texas 77511
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Angleton

415 North Walker St.
Angleton, Texas 77515
29.16706507263774, -95.44064699578404

**Fire Department**
Angleton Fire Department (3 min away)
221 North Chenango St.
Angleton, Texas 77515
979-849-1265

**Alternate Fire Department**
Angleton Fire Department (6 min away)
2743 North Velasco Street
Angleton, Texas 77515
979-549-0599

**Police Department**
Angleton Police Department (6 min away)
104 Cannon Dr
Angleton, Texas 77515
979-849-2383

**Alternate Police Department**
Lake Jackson Police Department
5 Oak Drive
Lake Jackson, Texas 77566
979-415-2700

**Hospital**
UTMB Health Angleton Danbury Campus (8 min away)
132 East Hospital Drive
Angleton, Texas 77515
979-849-7721

**Alternate Hospital**
UTMB Health (5 min away)
1108 A E Mulberry St.
Angleton, Texas
409-266-1888

**Utility Service**
TNMP
34425 TX-36
West Columbia, Texas 77486
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Heights

505 34th Street North
Texas, City, Texas 77590
29.38959513468383.-94.94986687931184

**Fire Department**
Texas City Fire Department (6 min away)
1725 North Logan St.
Texas City, 77590
409-643-5700

**Alternate Fire Department**
La Marque Fire Station #2 (7 min away)
1109 Bayou Rd# A
La Marque, Texas 77568
409-938-9260

**Police Department**
Texas City Police Department (6 min away)
1004 9th Ave N
Texas City, Texas 77590
409-948-2525

**Alternate Police Department**
La Marque Police Department (5 min away)
431 Bayou Rd
La Marque, Texas 77568
409-938-9269

**Hospital**
HCA Houston Healthcare Mainland (9 min away)
6801 Emmett F Lowry Expy
Texas City, Texas 77591
409-938-5000

**Alternate Hospital**
UTMB Health League City Hospital (16 min away)
2240 Gulf Fwy South
League City, Texas 77573
409-772-1011

**Utility Service**
TNMP
702 36th Street North
Texas City, Texas 77590
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Magnolia

1301 Floyd Road
League City, 77573
29.48833514905432, -95.13394693087155

**Fire Department**
League City Fire Station 1 (10 min away)
601 2nd St
League City, Texas 77573
281-544-1465

**Alternate Fire Department**
Forest Bend Fire Department (13 min away)
2300 Pilgrims Point Dr
Webster, Texas 77598
281-332-5209

**Police Department**
League City Police Department (10 min away)
555 West Walker St.
League City, Texas 77573
281-996-3300

**Alternate Fire Department**
Friendswood Police Department (14 min away)
1600 Whitaker Dr
Friendswood, Texas 77546
281-996-3300

**Hospital**
UTMB League City Hospital (10 min away)
2240 Gulf Fwy South
League City, Texas 77573
409-772-1011

**Alternate Hospital**
Memorial Hermann (8 min away)
2555 Gulf Fwy South
League City, Texas 77573
832-932-9900

**Utility Service**
TNMP
1207 West Parkwood Ave
Friendswood, Texas 77546
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Brazoria

1235-A CR 347
Brazoria, Texas 77422
29.06263504663519,-95.5775870264127

**Fire Department**
Wild Peach Fire Station (5 min away)
4172 County Rd. 353
Brazoria, Texas 77422
979-798-2351

**Alternate Fire Department**
Brazoria Fire Department (5 min away)
202 North Brooks St
Brazoria, Texas 77422
979-798-2277

**Police Department**
Brazoria Police Department (6 min away)
114 East Texas St.
Brazoria, Texas 77422
979-798-2195

**Alternate Police Department**
Sweeny Police Department (15 min away)
123 North Oak St
Sweeny, Texas 77480
979-548-3111

**Hospital**
Sweeny Community Hospital (14 min away)
305 North McKinney St.
Sweeny, Texas 77480
979-548-1500

**Alternate Hospital**
CHI St. Luke Health (19 min away)
100 Medical Dr.
Lake Jackson, Texas 77566
979-297-4411

**Utility Service**
TNMP
34425 TX-36
West Columbia, Texas 77486
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Loop 463

17206 North West Zac Lentz Pkwy
Victoria, Texas 77905
28.81647494839809, -97.07486739482162

**Fire Department**
Victoria Fire Department #5 (7 min away)
9508 Zac Lentz Pkwy
Victoria, Texas 77904
361-485-3000

**Alternate Fire Department**
Victoria Fire Department #1 (10 min away)
606 East Goodwin Ave
Victoria, Texas 77901
361-485-3444

**Police Department**
Victoria Police Department (9 min away)
306 Bridge St.
Victoria, Texas 77901
361-573-3221

**Alternate Police Department**
Port Lavaca Police Department (37 min away)
201 North Colorado St
Port Lavaca, Texas 77979
361-552-3788

**Hospital**
DeTar Hospital Navarro (8 min away)
506 East San Antonio St
Victoria, Texas 77904
360-573-6100

**Alternate Hospital**
Citizens Medical Center (15 min away)
2701 Hospital Dr
Victoria, Texas 77901
361-573-9181

**Utility Service**
TNMP
34425 TX-36
West Columbia, Texas 77486
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Sweeny

1511 CR372
Sweeny, Texas 77480
29.055614504167131,m -95.68723705408898

**Fire Department**
Sweeny Fire and Rescue (5 min away)
222 Pecan St
Sweeny, Texas 77480
979-548-3320

**Alternate Fire Department**
Brazoria Fire Department (18 min away)
202 North Brooks St
Brazoria, Texas 77422
979-798-2277

**Police Department**
Sweeny Police Department (4 min away)
123 North Oak St
Sweeny, Texas 77480
979-548-3111

**Alternate Police Department**
West Columbia Police Department (15 min away)
310 East Clay St.
West Columbia, Texas
979-345-5121

**Hospital**
Sweeny Community Hospital (4 min away)
305 North McKinney St.
Sweeny, Texas 77480
979-548-1500

**Alternate Hospital**
CHI St. Luke Brazosport Hospital (31 min away)
100 Medical Dr.
Lake Jackson, Texas 77566
979-297-4411

**Utility Service**
TNMP
34425 TX-36
West Columbia, Texas 77486
888-866-7456

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Ranch Town

12175 Pablo Hernandez
San Antonio, Texas 78023
29.61788505322159, -98.73594784095981

**Fire Department**
District 7 Fire Station 117 (3 min away)
185749 Bandera Rd.
Helotes, Texas 78023
210-668-0665

**Alternate Fire Department**
District 7 Fire Station Fire Station 116 (5 min away)
11805 Bandera Rd.
Helotes, Texas 78023
210-688-0665

**Police Department**
City of Helotes Police (10 min away)
12951 Bandera Rd.
Helotes, Texas 78023
210-695-3087

**Alternate Police Department**
UTSA Police Department (18 min away)
1 Bosque St
San Antonio, Texas 78249
210-458-4242

**Hospital**
LifeCare Hospitals of San Antonio (27 miles away)
8902 Floyd Curl Dr
San Antonio, Texas 78240
210-690-7000

**Alternate Hospital**
St Luke's Hospital(31 miles away)
7930 Floyd Curl Dr
San Antonio, Texas 78229
210-297-5000

**Utility Service**
CPS
511 South Salado St
San Antonio, Texas 78207
210-353-2222

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Dickinson

2320 Hollywood St.
Dickinson, Texas 77539
29.46125514600138,-95.05698690993236

**Fire Department**
Dickinson Volunteer Fire Station (4 min away)
4500 FM 517 Rd E
Dickinson, Texas 77539
281-534-3031

**Alternate Fire Department**
Dickinson Volunteer Fire Station 2 (4 min away)
221 Farm to Market 517 Rd W
Dickinson, Texas 77539
281-534-3031

**Police Department**
Dickinson Police Department
4000 Liggio St (4 minutes away)
Dickinson, Texas 77539
281-337-4700

**Alternate Police Department**
League City Police Department
555 West Walker St (10 min away)
League City, Texas 77573
281-332-2566

**Hospital**
Houston Physicians Hospital (8 min away)
333 North Texas Ave #1000
Webster, Texas 77598
281-957-6058

**Alternate Hospital**
UTMB Health League City Hospital (9 min away)
2240 Gulf Fwy, S
League City, Texas 77573
409-772-1011

**Utility Service**
TNMP
702 36th St North
Texas City, Texas 77590

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Zapata I and II

3112 State Hwy 16
Zapata, Texas 78076
26.9326745021109,-99.2337078577454

**Fire Department**
Zapata County Fire Department (5 min away)
305 FM 496
Zapata, Texas 78076
956-765-9942

**Alternate Fire Department**
City of Roma Volunteer Fire Dept (49 min away)
901 East Grant St
Roma, Texas 78584
956-849-1770

**Police Department**
Zapata County Police Dept (7 min away)
200 7th Ave Suite 415
Zapata, Texas 78076
956-765-9960

**Alternate Police Department**
City of Roma Police Department (49 min away)
987 East Grant St
Roma, Texas 78584
956-849-2231

**Hospital**
Starr County Memorial (1 hr. 3 min)
128 FM 3167
Rio Grande City, Texas 78582
956-487-5561

**Alternate Hospital**
Mission Regional Medical (1 hr. 50 min away)
900 Bryan Rd
Mission, Texas 78572
956-323-9000

**Utility Service**
American Electric Power
1519 West Calton Road
Laredo, Texas 78041
877-373-4558

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Pueblo I and II

3301 El Indio Hwy
Eagle Pass, Texas 78852
28.67893481292451,-100.463708218579

**Fire Department**
Eagle Pass Fire Station (3 min away)
2558 El Indio Hwy.
Eagle Pass, Texas 78852
830-757-4291

**Alternate Fire Department**
Eagle Pass Fire Department (7 min away)
2420 2nd St
Eagle Pass, Texas 78852
830-773-9690

**Police Department**
Maverick County Constable (7 min away)
701 Potro St
Eagle Pass, Texas 78852
830-757-6870

**Alternate Police Department**
Eagle Pass Police Department (7 min away)
110 S Monroe St
Eagle Pass, Texas 78852
830-773-9044

**Hospital**
Fort Duncan Medical Center
3333 North Foster Maldonado Blvd
Eagle Pass, Texas 78852
830-773-5321

**Alternate Hospital**
Untied Medical Center
2525 North Veterans Blvd
Eagle Pass, Texas 78852
830-773-5358

**Utility Service**
American Electric Power
1199 Eidson Rd. #1157
Eagle Pass, Texas 78852
877-373-4558

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Lopeno

4676 South US Hwy 83
Zapata, Texas 78076
26.6876144552995,-99.10941781963609

**Fire Department**
Zapata County Fire Department (21 min away)
305 FM 496
Zapata, Texas 78076
956-765-9942

**Alternate Fire Department**
City of Roma Volunteer Fire Dept (29 min away)
901 East Grant St
Roma, Texas 78584
956-849-1770

**Police Department**
Zapata County Police Dept (20 min away)
200 7th Ave Suite 415
Zapata, Texas 78076
956-765-9960

**Alternate Police Department**
City of Roma Police Department (24 min away)
987 East Grant St
Roma, Texas 78584
956-849-2231

**Hospital**
Starr County Memorial (38 min)
128 FM 3167
Rio Grande City, Texas 78582
956-487-5561

**Alternate Hospital**
DHR Health ( 1 hr. 41 min)
5501 South McColl Rd
Edinburg, Texas 78539
956-362-8677

**Utility Service**
South Texas Electric
2849 FM 447
Victoria, Texas 77901
361-575-6491

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## North Folk

51 PRV 905
Liberty Hill, Texas 78642
30.74895530455166,-97.87570768275121

**Fire Department**
Liberty Hill Fire Department
301 Loop 332
Liberty Hill, Texas 78642
512-515-5165

**Alternate Fire Department**
Liberty Hill Fire Department 2
22799 Ronald W Reagan Blvd
Liberty Hill, Texas 78642
512-515-5165

**Police Department**
Liberty Hill Police Department
1120 Loop 332
Liberty Hill, Texas 78642
512-515-5409

**Alternate Police Department**
Leander Police Department
705 Leander Dr
Leander, Texas 78641
512-528-2800

**Hospital**
St. David's Georgetown Hospital
2000 Scenic Dr
Georgetown, Texas 78626
512-943-3000

**Alternate Hospital**
Baylor Scott & White
810 West
Marble Falls, Texas 78654
830-201-8000

**Utility Service**
Pedernales Electric Cooperative
10625 W W State Hwy 29
Liberty Hill, Texas 78642
512-778-5470

BROAD REACH POWER

# Site Specific Address, Emergency Phone Numbers and Address's

## Bat Cave

2051 Post Hill Street
Mason, Texas 76856
30.73774525099855,-99.23177801618077

**Fire Department**
Mason Fire Department
Mason, Texas 76856
325-347-6363

**Alternate Fire Department**
San Angelo Fire Department
306 W 1 st ST
San Angelo, Texas 76903
325-657-4283

**Police Department**
Mason County Jail
122 Westmoreland St
Mason, Texas 76856
325-347-5556

**Alternate Police Department**
7000 Culebra Rd
7000 Culebra Rd
San Antonio, Texas 78237
210-207-7273

**Hospital**
Llano Memorial Healthcare
200 West Ollie St
Llano, Texas 78643
325-247-5040

**Alternate Hospital**
Heart of Texas Healthcare System
2008 Nine Rd
Brady, Texas 76825
325-597-2901

**Utility Service**
Lower Colorado River Authority
1338 Wirtz Dam Rd
Marble Falls, Texas 78657
830-693-6082

BROAD REACH POWER

## Site Specific Address, Emergency Phone Numbers and Address's

BROAD REACH POWER

# Hurricane Response Plan

## Broad Reach Power LLC

Power Generation Company (PGC)

Version 1.0
Effective Date: 04/18/2022

BROAD REACH POWER

In the event of a hurricane, the first priority is always the health and safety of BROAD REACH POWER personnel. BROAD REACH POWER's hurricane response process is listed below:

- Ensure all BROAD REACH POWER personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, BROAD REACH POWER personnel must evacuate at a time recommended by local authorities.
- BROAD REACH POWER facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
    - Ensure all loose material or equipment is secured.
    - Ensure proper draining channels exist and are functional

BROAD REACH POWER facilities in Region 1, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

BROAD REACH POWER facilities in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

BROAD REACH POWER facilities in Region 3, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

BROAD REACH POWER facilities in Region 4, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.
BROAD REACH POWER facilities in Region 5, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

BROAD REACH POWER facilities in Region 6, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

## Checklist(s) for generating facility personnel to address emergency events

BROAD REACH POWER shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

When re-entry to the affected facility is safe, it is important to ensure all emergency gear and equipment that may be necessary to clear paths are available, serviceable, and on hand to be used, if necessary. This equipment may include, depending on the circumstances, saws, tire chains, etc.
In the event that the entry route is obstructed or compromised, ensure proper PPE is worn and utilized and normal safety measures are employed.

BROAD REACH POWER

Always ensure communication is maintained between Broad Reach Power personnel attempting re-entry and Broad Reach Power leadership.

The following individuals are responsible for maintaining, implementing, and revising the PRP.

| Name | Title | Permission(s) |
|---|---|---|
| Luke Butler | Sr. Associate, Asset Management | Maintain |
| Mike Dubois | Manager of Real-time Operations | Implement |
| Luke Butler | Sr. Associate, Asset Management | Revise |

| Version | Approval Date | Effective Date | Revision Summary |
|---|---|---|---|
| 1.0 | 04/15/2022 | 04/18/2022 | Initial Hurricane Plan |

***As of 04/18/2022, annexes associated with EOP Version 1.0, approved on 04/15/2022, supersede all previous EOP annexes.***