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Plan Introduction

In accordance with the Public Utility Commission of Texas (“Commission”) Substantive Rule, 16 Texas Admin. Code (“TAC”) § 25.53, registered power generation companies (“PGCs”) Brightside Solar, LLC, Coletto Creek Power, LLC, Comanche Peak Power Company LLC, Emerald Grove Solar, LLC, Ennis Power Company, LLC, Hays Energy, LLC, La Frontera Holdings, LLC, Luminant Generation Company LLC, Midlothian Energy, LLC, Oak Grove Management Company LLC, Upton County Solar 2, LLC, and Wise County Power Company, LLC (collectively Luminant PGCs), and registered retail electric providers (“REPs”) Ambit Texas, LLC, Luminant ET Services Company LLC, TriEagle Energy LP, TXU Energy Retail Company LLC, and Value Based Brands LLC (“Vistra REPs”) (Luminant PGCs and Vistra REPs collectively, “Vistra”), respectfully submit the following revised comprehensive summary of Vistra’s Emergency Operations Plan (the “Enterprise Crisis Response Plan” or “EOP”). A redacted copy of the EOP is being submitted concurrently with this comprehensive summary. A complete unredacted set of the documents that comprise the Vistra EOP is available for review by the Commission or Commission Staff at a location designated by Commission Staff. Vistra has submitted or will submit shortly an unredacted copy of the EOP to ERCOT.

Emergency Operations Plan

Enterprise Crisis Response Plan

Prior to the Commission’s revisions to 16 TAC § 25.53, Vistra had undertaken proactive efforts to revise, coordinate, and consolidate crisis response procedures under an enterprise-wide, dynamic, agile, and crisis-agnostic framework (Vistra Enterprise Crisis Response Plan). This Vistra Enterprise Crisis Response Plan was revised following adoption of the Commission’s adopted EOP rule to improve alignment with 16 TAC § 25.53 where applicable. The Vistra Enterprise Crisis Response Plan, in combination with the Texas Retail Electric Provider Operations Plan, the Texas Power Generation Company Operations Plan, and the Vistra Communications Plan for ERCOT, meet the EOP requirements delineated in 16 TAC § 25.53.

Vistra Texas Retail Electric Provider Operations Plan

The Vistra Texas Retail Electric Provider Operations Plan consolidates and incorporates by reference policies and procedures to meet the EOP requirements delineated in 16 TAC § 25.53 specific to REPs.

Texas Power Generation Company Operations Plan

The Texas Power Generation Company Operations Plan consolidates and incorporates by reference policies and procedures to meet federal requirements as well as the EOP requirements delineated in 16 TAC § 25.53 specific to PGCs.

Communications Plan

This plan is intended to outline a general structure for an internal response to an emergency, hazard, or threat that may arise. The plan specifically includes a communication plan to interface, as is appropriate and applicable, with government agencies, the media, emergency operation centers, customers, and certain third parties.

Pre-Identified Supplies

Vistra REPs have an inventory of pre-arranged supplies at their corporate offices for emergencies associated with weather, fire or explosions, or pandemics, as appropriate for maintaining business continuity during an emergency. Vistra REPs regularly check these supplies and restock as appropriate.

All Luminant PGCs maintain an inventory of pre-arranged supplies and equipment for emergencies associated with weather, fire or explosions, or pandemics, as appropriate for individual plant and mine sites. Luminant PGCs regularly check these supplies and restock as appropriate.

Staffing During Emergency Response

Vistra REPs have customer service lines that are either available 24/7, or operate under extended business hours (e.g., 7am to 10pm, 7 days/week). In the event of an emergency, Vistra REPs will increase staffing as they deem appropriate across the applicable groups.

Luminant PGCs are staffed on a 24/7 basis. Luminant PGCs have plans in place to change staffing as they deem appropriate in the given situation.

Emergency Operations Plan Annexes

Weather Hazards & Water Shortages

Vistra REPs use the National Weather Service website to monitor predicted weather information to ensure that the safety of employees is protected during a weather emergency and that Vistra REPs can maintain business continuity during such an emergency.

Luminant PGCs use the National Weather Service website and National Oceanic and Atmospheric Administration weather radios as sources for predicted weather information. Luminant PGCs have weather plans that address seasonal readiness, acute events, and water shortages. These plans address staffing, supplies, site hardening, and other items, as they deem appropriate for the given weather event. Luminant PGCs additionally maintain checklists, processes, and procedures for personnel at each plant and mine site, as appropriate to the type of facility and location, to address a variety of emergencies, including seasonal and severe weather, fires or explosions, bomb threats, or medical emergencies.

Restoration of Service

All Luminant PGCs maintain to identify issues and restore service should a resource fail to start or trip.

Pandemic Preparedness Plan

The current Vistra Pandemic Preparedness plan is based on two objectives: to minimize virus transmission and to sustain essential services. The plan was implemented in response

to the COVID-19 Pandemic and updated to reflect lessons learned as well as COVID-19 specific requirements.

Hurricane Plan

Vistra has a generating plant located in a hurricane evacuation zone and, therefore, maintains specific hurricane plans in addition to its seasonal and severe weather readiness program for that site.

Cyber Security

Vistra maintains procedures to keep employees diligent in their online activities to address cyber security issues. Vistra additionally maintains plans and checklists should a cyber event occur.

Physical Security

Vistra REPs have on-site security at their corporate offices and maintain procedures to secure the physical footprint of those offices and secure the safety of employees and visitors. Vistra REPs maintain additional procedures that govern the response to breaches of physical security including active shooter situations and explosions.

Luminant PGCs maintain procedures in place to secure the physical footprint of the generation resource. Luminant PGCs maintain additional procedures that govern the response to breaches of physical security including active shooter situations and explosions.

Affidavit from Highest Ranking Officer

In accordance with 16 TAC § 25.53(c)(4)(C), an affidavit from Vistra's highest ranking officer, Chief Executive Officer Curtis A. Morgan, is included with this summary filing.

Specific Sections and Page Numbers

See attachment A

Emergency Response Contacts

Primary Contact – Amanda Frazier
Senior Vice President, Regulatory Policy
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Cell: 512-364-3275

Secondary Contact – Ned Bonskowski
Vice President, Texas Regulatory Policy
ned.bonskowski@vistracorp.com
Office: 512-349-6464
Cell: 214-288-2456

Attachment A

General Requirements Page Guide

	(d)(1) - Approval & Implementation	(d)(2) - Communication Plan	(d)(3) - Emergency Supplies	(d)(4) - Staffing	(d)(5) - Weather Emergency
Brightside Solar, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Coletto Creek Power, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Comanche Peak Power Company LLC	0002	0094-0095	0105-0108	0105-0108	0097-0102
Emerald Grove Solar, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Ennis Power Company, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Hays Energy, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
La Frontera Holdings, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Luminant Generation Company LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Midlothian Energy, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Oak Grove Management Company, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Upton County Solar 2, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Wise County Power Company, LLC	0002	0094-0095	0076	0076	0076, 0083-0084
Ambit Texas, LLC	0002	0094-0095	0063	0063	0065-0066
Luminant ET Services Company LLC	0002	0094-0095	0063	0063	0065-0066
TriEagle Energy LP	0002	0094-0095	0063	0063	0065-0066
TXU Energy Retail Company LLC	0002	0094-0095	0063	0063	0065-0066
Value Based Brands LLC	0002	0094-0095	0063	0063	0065-0066

Power Generation Company Annex Page Guide

	(e)(2)(A)(i) - Weather Emergency	(e)(2)(A)(ii) - Fuel Switching	(e)(2)(A)(iii) - Checklist	(e)(2)(B) - Water Shortage	(e)(2)(C) - Restoration of Service	(e)(2)(D) - Pandemic	(e)(2)(E) - Hurricane	(e)(2)(F) - Cyber Security	(e)(2)(G) - Physical Security
Brightside Solar, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Coletto Creek Power, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	0125-0126	0090	0077-0079
Comanche Peak Power Company LLC	0097-0102	NA - no fuel switching equipment	0097-0102	0103-0104	0109-0120	0122	NA - no facilities in a TDEM hurricane evacuation zone	0124	0121
Emerald Grove Solar, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Ennis Power Company, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Hays Energy, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
La Frontera Holdings, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Luminant Generation Company LLC	0076, 0083-0084	0085	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Midlothian Energy, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Oak Grove Management Company, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079
Upton County Solar 2, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079

Wise County Power Company, LLC	0076, 0083-0084	NA - no fuel switching equipment	0084	0087	0088	0089, 0047- 0059	NA - no facilities in a TDEM hurricane evacuation zone	0090	0077-0079

Retail Electric Provider Annex Page Guide

	(e)(3)(A) - Pandemic	(e)(3)(B) - Hurricane	(e)(3)(C) - Cyber Security	(e)(3)(D) - Physical Security
Ambit Texas, LLC	0067, 0047-0059	NA - no core operations located in a TDEM hurricane evacuation zone	0068	0069-0071
Luminant ET Services Company LLC	0067, 0047-0059	NA - no core operations located in a TDEM hurricane evacuation zone	0068	0069-0071
TriEagle Energy LP	0067, 0047-0059	NA - no core operations located in a TDEM hurricane evacuation zone	0068	0069-0071
TXU Energy Retail Company LLC	0067, 0047-0059	NA - no core operations located in a TDEM hurricane evacuation zone	0068	0069-0071
Value Based Brands LLC	0067, 0047-0059	NA - no core operations located in a TDEM hurricane evacuation zone	0068	0069-0071

CONFIDENTIAL

Attachment B
to Executive Summary - Distribution List

Filed under seal in accordance with 16 Tex. Admin. Code 22.71

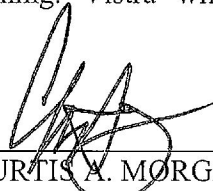
AFFIDAVIT OF CURTIS A. MORGAN

STATE OF TEXAS §
§
COUNTY OF DALLAS §

BEFORE ME, the undersigned Notary Public, on this day appeared Curtis A. Morgan, who being first duly sworn according to law upon his oath, deposed and said:

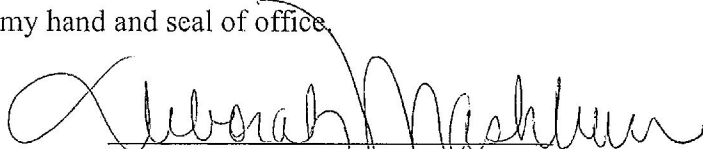
1. I am Chief Executive Officer of Vistra Corp. and each of the following indirect subsidiaries of Vistra Corp., upon whose behalf I am making this affidavit:
 - a. Brightside Solar, LLC, Coletto Creek Power, LLC, Comanche Peak Power Company LLC, Emerald Grove Solar, LLC, Ennis Power Company, LLC, Hays Energy, LLC, La Frontera Holdings, LLC, Luminant Generation Company LLC, Midlothian Energy, LLC, Oak Grove Management Company LLC, Upton County Solar 2, LLC, and Wise County Power Company, LLC, which are each registered power generation companies (“PGCs”) and which are collectively referred to herein as “Luminant PGCs.”
 - b. Ambit Texas, LLC, Luminant ET Services Company LLC, TriEagle Energy LP, TXU Energy Retail Company LLC, and Value Based Brands LLC, which are each certificated retail electric providers (“REP”) and which are collectively referred to herein as “Vistra REPs.”
 - c. The Luminant PGCs and Vistra REPs are collectively referred to herein as “Vistra.”
2. I have personal knowledge of the facts stated in this affidavit, and they are true and correct.
3. I am familiar with Vistra’s revised Emergency Operations Plan (“Revised EOP”) and the comprehensive summary of the Revised EOP, which Vistra is filing with the Public Utility Commission of Texas (“Commission”) in accordance with very recent revisions to 16 Tex. Admin. Code (“TAC”) § 25.53, which went into effect on March 20, 2022 (“New Rule”). I am also familiar with the EOP that was in effect (“Previous EOP”) in accordance with the requirements of the former version of 16 TAC § 25.53 (“Former Rule”).
4. Relevant operating personnel at Vistra are familiar with and have received training on the applicable contents and execution of the Previous EOP. In addition:

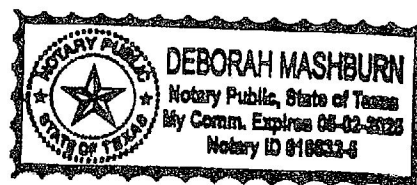
- a. Relevant operating personnel will become familiar with and receive training on the applicable contents and execution of applicable new sections in the Revised EOP, which Vistra has compiled very recently to comply with the New Rule.
 - b. Such personnel have been and will be instructed to follow the applicable portions of the Revised EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
 - c. Vistra will file a supplemental affidavit once required training regarding the Revised EOP is complete, in accordance with the New Rule.
5. The Revised EOP has been reviewed and approved by the appropriate Vistra executives.
 6. Drills of the Previous EOP were conducted in accordance with the requirements of the Former Rule. In addition:
 - a. Drills of the Revised EOP will be conducted in accordance with the New Rule.
 - b. Vistra will file a supplemental affidavit once such drills are complete.
 7. The Revised EOP or an appropriate summary will be distributed to local jurisdictions as needed.
 8. Vistra maintains business continuity plans that address returning to normal operations after disruptions caused by an incident.
 9. Vistra's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events are in the process of and will complete the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. Vistra will file a supplement affidavit once such training is complete.


CURTIS A. MORGAN

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 14th day of April 2022, to certify which witness my hand and seal of office.

My Commission Expires:


Notary Public, State of Texas





Vistra Corp Enterprise Crisis Response Plan

Released:	2/15/22	Effective Date:	2/15/22
Review Date:	4/12/22	Next Review Date:	Feb. 2023
Reviewed by:	Executive Committee, Program Executive Sponsor, Program Owner, Crisis Response Leader		
Approved by:	Executive Committee, Program Executive Sponsor, Program Owner, Crisis Response Leader		

DOCUMENT HISTORY

The Enterprise Crisis Response Plan should be reviewed on an annual basis and updated when the following types of events occur:

- ☐ Significant change in personnel
- ☐ Reorganization
- ☐ Major process or equipment change
- ☐ Change in business or product focus
- ☐ After an exercise or crisis

The Crisis Response Lead is responsible for maintaining this Plan and providing updates to team members via the system of record. No changes may be made to this plan without approval of the Program Executive Sponsor or Crisis Response Leader. The following revision record should be completed whenever changes are made to the Plan.

Date	Version	Description	Author
2/15/22	1.0	Enterprise Crisis Response Plan	G. Vazquez
4/12/22	1.1	ECRP revised for Texas PUC EOP requirements	Legal/Regulatory

This, Version 1.1, of the Enterprise Crisis Response Plan supersedes all previous versions of this plan.

Signature

Date

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1.0 Introduction

1.1 Purpose and Scope

The Enterprise Crisis Response Plan (“ECRP”):

- **Assigns a cross-functional core team** of responders with authority to manage crisis related responses effectively, efficiently and consistently in order to mitigate impact to Vistra’s people, operations, reputation and strategy.
- Is specifically designed to be **dynamic, agile, and crisis agnostic**¹, as well as a **resource of repeatable and consistent processes** and response information, given that facts and circumstances will vary per crisis.
- Serves to **guide Vistra’s responses** to identified ‘crises’ per the Impact Severity Matrix.²
- Serves as **one part of Vistra’s broader risk management program**, which is the product of considered preparation and post-incident lessons learned efforts.
- **Documents responsibilities, considerations, and authorities** for Vistra employees/third-party support participating in the two phases of a Crisis Response Lifecycle: Respond and Recover (defined in the Enterprise Crisis Management Program Governance Document)

1.2 Guiding Principles

This Plan is centered around and aligned to Vistra’s purpose and values. These concepts serve as the Guiding Principles for the Enterprise Crisis Management Program. Actions and decisions made during any phase of the Crisis Management Lifecycle - especially response - should preserve and be guided by these principles³:

- **We do business and resolve issues the right way:** Every decision we make and action we take will be evidence of the utmost integrity and compliance. Conducting our daily activities within the laws, regulations, and rules is not an option we choose but rather the way we do business that is ingrained in our culture.
- **We care about our key stakeholders:** We care about our employees, customers, and communities where we live and do business. We will maintain productive and respectful relationships with our elected officials, regulators and community leaders. We strive to achieve the full value of our enterprise for our investors.
- **We work as a team:** We are committed to each other, in everything we do and to the success of our company. Collaboration, information sharing, and cross-functional teamwork are fundamental to how we conduct our day-to-day activities.
- **We compete to win:** We are committed to creating the leading integrated energy company and embrace obstacles as growth opportunities for our organization, demonstrating our unmatched work ethic, analysis-driven and disciplined culture, and strong leadership to resolve complex challenges.

¹ This is an evolving document that should be reviewed semiannually and updated, as needed.

² Incidents or events of lesser severity will be managed by the appropriate division/functional area through standard policies and procedures, which are outside the scope of this Plan.

³ <https://vistracorp.com/about/core-principles/>

When debates arise about how activities or tasks should be prioritized during a response, these guiding principles shall serve to clarify what should happen and in what order. The CEO maintains final authority of interpretation if in any doubt.

1.3 Crisis Definition

Vistra defines a “**crisis**” as **any** situation that has the potential to:

- Have a catastrophic impact on the life/safety of employees or customers;
- Have a significant enterprise-wide impact on the ability to deliver services;
- Have significant financial impact;
- Be harmful to the continuity of electric service;
- Cause strong long-lasting reputational harm/damage; and/or
- Have a significant regulatory/legal impact that results in lawsuits and/or fines.

A **crisis** typically requires operational and **strategic management** by multiple functions, communications to multiple stakeholders both internal and external, and a response that considers both the short-term and long-term impacts of a situation. A crisis will be managed by the Crisis Response Team.

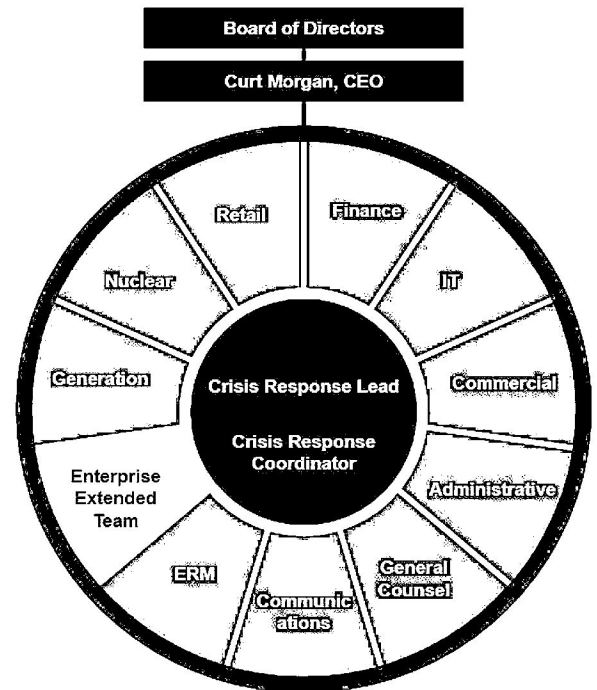
Unlike a crisis, an **event** is defined as any occurrence or situation where the impact can be managed at the Business Unit(s) level (by Site Management and/or Functional Area Team) - *and is outside the scope for this Program*. An event typically includes situations that involve a single location/geographic area, department and/or business-specific response plan/team.

2.0 Crisis Response Team

2.1 Overview

The Crisis Response Team is comprised of four key elements:

- Crisis Response Lead (the Lead):** Directs, manages and maintains the Enterprise Crisis Response Program and aligns with Enterprise Risk Management. In the event of a crisis, as defined in [Section 1.3](#), activates and directs the Crisis Response Team. The Crisis Response Lead is responsible for determining when to de-escalate the response and conduct the formal feedback loop to capture lessons learned.
- Crisis Response Coordinator:** Supports Crisis Response Lead, as needed.
- Crisis Response Core Team (Core Team):** the consistent group of responders that is activated for **every** crisis response. The Core Team is led by the Crisis Response Lead. Each Core Team member has designated responsibilities including role-specific considerations and authorities (where applicable), outlined in [Appendix D](#) of the Plan. This group is:
 - To remain consistent to build institutional knowledge and to provide continuity and accountability from crisis to crisis.
 - Involved in every kind of crisis regardless of hazard type.
 - Expected to actively participate in Core Team responsibilities and activities.
- Crisis Response Extended Team (Extended Team):** *selected individuals* from this group will be activated to join the Crisis Response Team, by matching their subject matter expertise with the facts and circumstance of the crisis. The Extended Team is composed of other divisions, subsidiaries and functional areas that may be called upon by the Core Team to support responses. Members of this group:
 - If activated, are combined with the Core Team to become the Crisis Response Team and must follow the responsibilities listed above for the Core Team.
 - May be activated or deactivated at different times and under different circumstances throughout a crisis response.
 - Must promptly respond to requests to convene on a team call 24/7.



Crisis Response Team = Core Team + Activated Extended Team

Together, the Crisis Response Team is responsible for:

- Delivering an organization-wide response/recovery in line with the Guiding Principles;
- Promoting consensus regarding response actions, even with little information; and,
- Serving as the primary coordination and decision-making body for Vistra response and recovery from the crisis.

After declaring an official 'Crisis', the Lead will activate and convene the Core Team. The Core Team will immediately identify which members of the Extended Team should be activated to respond to the specific crisis at hand.

Each Crisis Response Team role has a primary and secondary contact (see [Appendix A](#) and [Appendix B](#)). If the primary contact is unavailable, the Lead will activate the secondary contact, who will assume responsibility and execute the required tasks of the primary.

2.2 Crisis Response Core Team (Core Team)

The Core Team is led by the Crisis Response Lead. Each Core Team member has designated responsibilities including role-specific considerations and authorities (where applicable), outlined in [Appendix D](#). This group is:

- To remain consistent to build institutional knowledge and to provide continuity and accountability from crisis to crisis.
- Involved in every kind of crisis regardless of hazard type.
- Is regularly informed of crisis response activities and impacts.
- Provides additional resources, when requested by the Lead, to execute on crisis response activities.
- Expected to actively participate in Core Team responsibilities and activities.

It is expected that if the Crisis Response Team is activated, that the identified issue and response becomes the number one priority for all members of the team. If unavailable to serve on the Crisis Response Team due to travel or an extended leave of absence, the Lead must coordinate with the primary contact to notify and activate the secondary contact to serve in their place.

2.3 Crisis Response Extended Team (Extended Team)

The Extended Team is composed of other divisions, subsidiaries and functional areas that may be called upon by the Enterprise Core Team to support responses, depending on facts, circumstances and potential impact. Members of this group:

- If activated, they are combined with the Core Team to become the Crisis Response Team and must follow the responsibilities listed above for the Core Team.
- May be activated or deactivated at different times and under different circumstances throughout a crisis response.
- Must promptly respond to requests to convene on a team call 24/7.

2.4 Crisis Response Workstream Leads

A Crisis Response Workstream Lead ("Workstream Lead") actively leads an established workstream in support of crisis response efforts (as indicated in [Section 4.2](#)) on behalf of the Crisis Response Team, and updates/informs respective Crisis Response Team members accordingly. A Workstream Lead:

- Executes crisis response activities as directed by the Crisis Response Team and Lead through identified workstreams, as appropriate.
- Provides relevant information at the Crisis Response Team's request to assist with decision making during crisis situations.
- Will be selected at the time of the crisis based on availability, expertise and skills needed to lead the workstream.

3.0 Activation

The detailed Enterprise Crisis Response Plan activation process and associated responsibilities are outlined in this section. The flow chart below demonstrates the process from initial detection to crisis declaration. Functional Area Leads include functional areas where a potential situation may arise and trigger use of this process.

3.1 Assessing Crisis Severity

Once a potential crisis is escalated to the Lead, he/she should use the Impact Severity Matrix (see below) and the Initial Impact Assessment (see [Appendix F](#)) to objectively and consistently measure a crisis' potential⁴ or known impact to Vista based on a uniform set of criteria. **The situation should be identified as a “crisis” if one or more of the potential impact areas, as outlined in the Impact Severity Matrix, meets the crisis criteria.**

⁴ The Lead should also document the **potential** impact, understanding that the extent of impact may not be known at the time of assessment.

This matrix:

- **Should not replace good judgment;**
- **Is intentionally broad** and situation agnostic because all impacts will likely not be known at the time of assessment and the potential crisis will typically impact multiple areas and have cascading effects;
- Is intended for the Lead to **leverage to officially classify a crisis**, as well as to activate the Crisis Response Core and Extended Team;
- Will also be leveraged by the Lead to **de-escalate the crisis** as appropriate.

Impact Areas	Crisis Criteria
Health & Safety	<ul style="list-style-type: none"> • Event causing high risk or ongoing threats to employees and third parties. Significant injury or loss of life, or long-term health impact and/or hospitalization.
Human Capital	<ul style="list-style-type: none"> • Event that severely impacts Vistra's ability to attract new employees, retain current employees, and develop employee skills for an extended period of time. Impacted employees span across all business functions.
Operational	<ul style="list-style-type: none"> • Major impact to material internal processes downstream or upstream that stops other operations with no viable workaround and / or remediation requires 1 week or more • Event that has the potential to threaten the continuity of electric service • Causes major inconvenience and potential loss of customers.
Customer / Counterpart Satisfaction	<ul style="list-style-type: none"> • Significant amount of customers / counterparties impacted and/or customer notification and action potentially required due to business processes being disabled.

The Lead should leverage the Initial Impact Assessment template ([Appendix F](#)) to document the rationale used to determine the appropriate level of response relative to the Impact Severity Matrix.

3.2 Activation & Escalation

Once the Lead declares an official “crisis”, he/she, with support from the Crisis Response Coordinator, will formally activate the Enterprise Crisis Response Plan and Enterprise Crisis Response Core Team.

-

The graphic below shows the process to organize and execute the crisis response workstreams, and the information sharing between the Crisis Response Team, workstreams and CEO/Board during a response. Details on the workstreams are provided below in section [4.2 Response Approach](#).

4.0 Response Approach & Information Sharing

4.1 Logistics

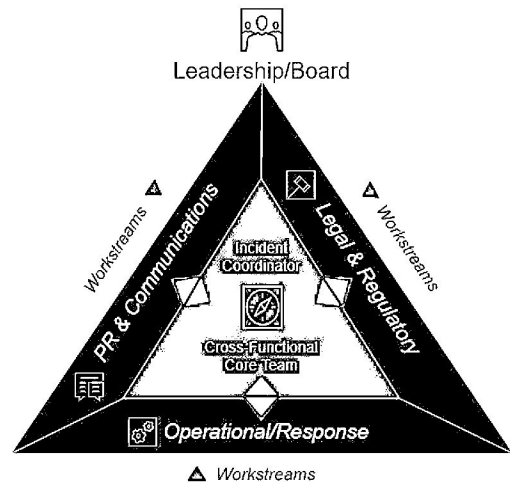
During a crisis, information changes rapidly as the situation develops. It is important that information is shared regularly among the Crisis Response Team members to facilitate timely and accurate decision-making and actions. Once the Plan has been activated, the following logistics and communications protocols allow the Crisis Response Team to meet, connect and communicate regularly.

Crisis Response Team Meeting Information

Other meeting considerations:

4.2 Response Approach

After activation, the Crisis Response Team will meet to identify immediate and long-term priorities and start to assign responsibility for associated action items (use the Meeting Agenda in [Appendix I](#), and the Situation Report in [Appendix H](#)). These actions will then be organized via a standard work plan template into clearly defined priority workstreams, generally starting with **Legal & Regulatory**, **Public Relations (PR) and Communications**, and **Operational** and expanding out as necessary. These priority workstreams will be assigned milestones and can/should have multiple sub-workstreams based on the breadth of the crisis. The breakdown below explains the responsible, accountable, consulted and informed stakeholders involved with the priority workstreams:



- **Responsible:** The actual execution of the action items associated with each workstream will be assigned to Workstream Lead, who will work with the relevant Business Unit or Functional Area Leads to complete the tasks.
- **Accountable:** Members of the Crisis Response Team will be assigned to oversee the workstreams that fall under their functional area/area of responsibility.
- **Consulted:** The Crisis Response Team will leverage the Lead to consult the CEO and CFO on key decisions, as needed.
- **Informed:** The Crisis Response Team member accountable for each workstream will share key decisions and priority actions executed within each workstream to the rest of the Crisis Response Team on the regular occurring Crisis Response Team meetings.

4.3 Business Emergency Operation Plans

Upon activation, the Crisis Response Team will refer to specified emergency operations plans as certain markets or business units may require. The plans, where applicable, shall address common operational functions that are relevant across emergency types and include training requirements (e.g., National Incident Management System (NIMS) training) and any emergency response coordination.

- Generation: Appendix C-2 outlines actions specific to certain emergency actions relating to generation operations as required by Public Utility Commission of Texas §25.53 Electric Service Emergency Operations Plans.
- Retail: Appendix C-3 outlines actions specific to certain emergency actions relating to retail operations as required by Public Utility Commission of Texas §25.53 Electric Service Emergency Operations Plans.

4.4 External Communications

Any external communications on behalf of Vistra by any employee must be coordinated through the Crisis Response Team which includes Vistra's Chief Spokesperson, in consultation with the General Counsel, Crisis Response Lead and internal and external counsel, as appropriate. This includes any response to media calls, interviews, news releases, and distribution of any other written material.

Appendix A and Appendix B provide internal contacts for Vistra reference and Appendix C-1 provides emergency contact information for external parties relating to Texas operations, as required by Public Utility Commission of Texas §25.53 Electric Service Emergency Operations Plans.

4.5 Financial Tracking

When Vistra is in an active crisis response and if expenditures are expected to support the crisis response effort, the Lead will advise the Finance Lead to ensure spending is accurately tracked throughout the response. The Lead will share the code with the Crisis Response Team and all expenses directly related to the crisis response should be charged to this code.

5.0 Deactivation

The Lead will determine when to de-escalate or deactivate a response effort, and by extension use of this Plan. Once the Crisis Lead has confirmed with relevant workstream leads that business operations have returned to business-as-usual, the Response phase is completed, the crisis response can be closed, and the post-crisis review process can begin. Some crisis activity may continue once active response has closed (e.g., maintenance, remediation regulatory, litigation, media communication, etc.). Key considerations of the deactivation process include:

- Are operational conditions back to a functional level?
- Are safety conditions back to a functional/acceptable level?
- Are response teams able to resume traditional roles effectively?
- Was the initial impact severity level classified accurately based on what we know now?

Required actions prior to deactivating include:

- **Deactivation Notification:** Notify appropriate parties that deactivation is underway,
- **Align on Workstream Continuation:** Establishing small “continuation” team should some workstreams require continued effort and maintaining activation of/activating relevant response plans, as applicable (e.g., business continuity plans); and
- **Legal Requirements:** Satisfying all required regulatory or legal requirements or ensuring they will be met.

5.1 After-Action Process

After a crisis response has concluded, the Crisis Response Team will conduct an after-action review to compile lessons learned. Each crisis response workstream should complete an after-action review (as outlined below) and provide lessons learned to the Lead. The Lead will be responsible for consolidating the lessons learned, sharing them with the entire Crisis Response Team, and monitoring/confirming that corrective actions are taken to improve crisis response capabilities in the future. The after-action review should include:

- Crisis response overview
- Crisis timeline with key meetings, milestones, and decisions
- Log of key decisions & actions lessons learned
- Prioritized recommendations for improvement
- Roadmap for improvement which should include action items, including priority level, level of effort, individuals accountable and deadlines

Appendix

Items found in this section are to be used by the individuals identified in this Plan as additional resources.

- [Appendix A: Crisis Response Core Team Contact List](#)
- [Appendix B: Extended Team Contact List](#)
- [Appendix C-1: Texas Emergency Contact List](#)
 - (required by PUCT §25.53 Electric Service Emergency Operations Plans)
- [Appendix C-2: Texas Power Generation Company \(EGC\) Operations Plan](#)
 - (required by PUCT §25.53 Electric Service Emergency Operations Plans)
- [Appendix C-3: Texas Retail Electric Provider Operations Plan](#)
 - (required by PUCT §25.53 Electric Service Emergency Operations Plans)
- [Appendix D: Core Team Tear-Out Sheets](#)
- [Appendix E: Third Parties & External Support Contacts](#)
- [Appendix F: Initial Impact Assessment](#)
- [Appendix G: Meeting Cadence Guide](#)
- [Appendix H: Situation Report](#)
- [Appendix I: Meeting Agenda](#)
- [Appendix J: Crisis Response Daily Status Update Template](#)
- [Appendix K: Decision Log](#)
- [Appendix L: Glossary](#)

Appendix A: Crisis Response Core Team Contact List

Core Team Role	Primary Individual	Secondary Individual
Crisis Response Lead	Name: Email: Phone	Name: Email: Phone
Crisis Response Coordinator	Name: Email: Phone	Name: Email: Phone
Retail	Name: Email: Phone	Name: Email: Phone
Finance	Name: Email: Phone	Name: Email: Phone
Information Technology	Name: Email: Phone	Name: Email: Phone
Commercial	Name: Email: Phone	Name: Email: Phone
Administrative	Name: Email: Phone	Name: Email: Phone
General Counsel	Name: Email: Phone	Name: Email: Phone
Communications	Name: Email: Phone	Name: Email: Phone
Generation	Name: Email: Phone	Name: Email: Phone
Nuclear	Name: Email: Phone	Name: Email: Phone
Environmental Health & Safety	Name: Email: Phone.	Name: Email: Phone.

Appendix B: Extended Team Contact List

Extended Team Role	Primary Individual	Secondary Individual
Enterprise Risk Management	Name: Email: Phone	Name: Email: Phone
Regulatory Affairs	Name: Email: Phone	Name: Email: Phone
Government Affairs	Name: Email: Phone	Name: Email: Phone
Human Resources	Name: Email: Phone	Name: Email: Phone
Cyber	Name: Email: Phone	Name: Email: Phone
Investor Relations	Name: Email: Phone	Name: Email: Phone
Treasury	Name: Email: Phone	Name: Email: Phone
Physical Security	Name: Email: Phone	Name: Email: Phone
Facilities	Name: Email: Phone	Name: Email: Phone
Customer Communications	Name: Email: Phone	Name: Email: Phone
Customer Operations	Name: Email: Phone	Name: Email: Phone
Cyber/Privacy Counsel	Name: Email: Phone	Name: Email: Phone:

Appendix C-1: Texas Emergency Contacts:

(Required by PUCT §25.53 Electric Service Emergency Operations Plans)

Core Team Role	Primary Individual	Secondary Individual
ERCOT Emergency Contact	Name: Amanda Frazier Email: amanda.frazier@vistracorp.com Phone: 512.364.3275	Name: Ian Haley Email: ian.haley@vistracorp.com Phone: 512.673.9655
PUCT Emergency Contact	Name: Amanda Frazier Email: amanda.frazier@vistracorp.com Phone: 512.364.3275	Name: Ned Bonskowski Email: ned.bonskowski@vistracorp.com Phone: 214.288.2456
OPUC Emergency Contact	Name: Amanda Frazier Email: amanda.frazier@vistracorp.com Phone: 512.364.3275	Name: Ned Bonskowski Email: ned.bonskowski@vistracorp.com Phone: 214.288.2456
TDEM Emergency Contact	Name: Sam Siegel Email: samuel.siegel@vistracorp.com Phone: 214.930.9563	Name: Ned Bonskowski Email: ned.bonskowski@vistracorp.com Phone: 214.288.2456

Appendix C-2: Texas Power Generation Company (EGC) Operations Plan

(Required by PUCT §25.53 Electric Service Emergency Operations Plans)

[link to document]

Appendix C-3: Texas Retail Electric Provider Operations Plan

(Required by PUCT §25.53 Electric Service Emergency Operations Plans)

[link to document]

Appendix D: Crisis Response Core Team Tear-Out Sheets

Crisis Response Lead	
Consistent Responsibilities	
Authorities	
The Crisis Response Lead is authorized to:	
Key Considerations	Key Actions
Initial Activation	
Active Response	

Recover

Crisis Response Coordinator	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

--	--

<div>Administrative</div> <div>(Human Resources, Community Affairs, Supply Chain, Corporate Security and Facilities Management)</div>	
<div>Consistent Responsibilities</div>	
<div>Authorities</div>	
<div>Key Considerations</div>	<div>Key Actions</div>
<div>Initial Activation</div>	
<div>Active Response</div>	

Recover	

Business Unit Leads (Retail, Generation, Nuclear, Commercial)	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

Communications	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

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Enterprise Risk Management	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

Finance	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

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General Counsel / Legal	
Consistent Responsibilities	
Authorities	
Key Considerations	Key Actions
Initial Activation	
Active Response	
Recover	

--	--

Information Technology**Consistent Responsibilities**

Appendix E: Third Parties & External Support Contacts

The below chart outlines current third parties and external support contacts for a crisis response.

Appendix F: Initial Impact Assessment

The Lead should leverage the template below to document the rationale used to determine the appropriate level of response relative to the [Impact Severity Matrix](#). The Lead should document the **potential** impact, understanding that the extent of impact may not be known at the time of assessment.

Initial Impact Assessment		
Determined Severity Level:		
Date & Time:		
Impact Area	Considerations	Known or Projected Data Point
Health & Safety		
Human Capital		
Financial / Lost EBITDA		
Operational		
Legal		
Regulatory / Compliance		
Customer / Counter Satisfaction		
Reputational / Brand		
IT / Cyber Security & Data Privacy		

Appendix G: Meeting Cadence Guide

The table below summarizes information sharing activities held during a response. Following initial activation, the Crisis Response Lead should determine a preferred meeting/update cadence with relevant parties.

**Meeting cadence may become less frequent as the crisis begins to de-escalate back to business as usual.*

Prior to the Crisis Response Team Stand-up, each team member must prepare their status update and be ready to share their response actions and roadblocks with the broader Crisis Response Team. The status update/round robin structure is outlined in the Crisis Response Team Meeting Agenda ([Appendix H](#)).

During/following Crisis Response Team Stand-Ups, it is essential that the Lead documents changes in the response effort and key decisions made. Templates for reporting can be found in the Appendix; [Situation Report](#), [Meeting Agenda](#), and [Decision Log](#).

Appendix H: Situation Report

This document is intended to be updated by the Crisis Response Coordinator guide Crisis Response Team meeting discussions and capture changes in/additional information related to the response effort.

Vistra Crisis Response Team Report		[Event]
Update	Date:	Time:
Current Status & Ongoing Response Efforts		Updating Party
<ol style="list-style-type: none"> 1. (Not applicable for the first meeting) Has the severity level of the situation changed since the previous report? 2. What key accomplishments have been achieved? 3. Have there been newly identified issues? If so, do new core team members need to be activated? 4. Do we continue to have the resources needed to manage our response efforts? 5. Have there been any notable lessons learned regarding the crisis response? 		
Information Sharing & Communications Strategy		Responsible Party
<ol style="list-style-type: none"> 1. Are updates or changes to our communications/messaging required? 2. What internal stakeholders need to be communicated with? What do they need to know? 3. What external stakeholders need to be communicated with? What do they need to know? 4. Do we need to provide an immediate update to the CEO/Board? 		
Next Steps & Accountabilities		Responsible Party/Timing
<ol style="list-style-type: none"> 1. What are the immediate priorities? 2. What tactical actions need to be assigned and who should be accountable for them? When are they due? 3. What milestones are approaching and when? Are they achievable? 4. What key decisions are pending? 5. What roadblocks are we facing? 		
Resources – located on Event Crisis Response Cloud Storage Site		
<ul style="list-style-type: none"> • • 		

Appendix I: Meeting Agenda

This meeting agenda may be used as a template during active CRISIS RESPONSE to guide the team meetings once the Enterprise Crisis Response Plan and Crisis Response Team have been activated.

Directions: The Meeting Agenda should be copied and pasted into the Crisis Response Team Meeting calendar invite by the Crisis Response Coordinator. Crisis Response Team members should have their status updates prepared and be ready to share with the rest of the team during the “Current Situation Status” agenda item.

Subject: Crisis Response Team Meeting

Meeting Participants: Crisis Response Lead (meeting facilitator), Crisis Response Coordinator (meeting support and scribe), Crisis Response Team

Ultimate Decision-maker: Crisis Response Lead

Meeting Invite Agenda

In this recurring Crisis Response meeting we will cover the following:

1. **Overview of Facts**
 - a. Impact to Vistra, by Impact Areas (as outlined in the Impact Severity Matrix)
2. **Current Situation Status and Ongoing Response Efforts**
 - a. In a round-robin format, each functional area will provide a status update guided by the following questions:
 - What have you completed since the previous Crisis Response Meeting?
 - What do you plan to complete by the next Crisis Response Meeting?
 - Any unexpected issues or barriers?
3. **Key Decisions, Meetings, and Milestones**
 - a. Overview of key decisions made and accomplishments
 - b. Upcoming milestones and/or roadblocks
4. **Information Sharing & Communication Strategy**
 - a. Internal and external stakeholder communication strategy
 - b. CEO/Board Engagement
5. **Next Steps and Accountability**
 - a. Identify immediate priorities and
 - b. Assign action items and applicable deadlines

Directions: The Crisis Response Team Meeting will be facilitated by the Crisis Response Lead. The Crisis Response Team meeting should be conducted and facilitated with Vistra’s Purpose and the Guiding Principles in mind (see section 1.1 of the Enterprise Crisis Response Plan). The Crisis Response Lead will share the Overview of the Facts, and then call on the Core Team to present their statuses during the “Current Situation Status” portion of the meeting. The Crisis Response Coordinator will support the Crisis Response Lead with the logistics and meeting coordination.

Crisis Response Meeting Facilitators Guide:

Pre-Meeting Logistics (Crisis Response Coordinator)

- 1.
2. Team Meeting roll call
 - a. In-person Meeting - traditional role call format
 - b. Virtual Platform - make sure that people are properly logged in, so you are appropriately identified as present
 - c. Mute individuals who are not identified for the round-robin

Meeting Facilitation (Crisis Response Lead)

1. **Overview of Facts**
 - a. Share information gathered in the (updated) Situation Report
2. **Current Situation Status and Ongoing Response Efforts**
 - a. Utilize an agile meeting structure for the round-robin portion of the meeting, leveraging the parking lot for anything that needs to be revisited in future meetings.
 - b. Each representative will consider the following questions when providing their status update:
 - i. What have you completed since the previous Crisis Response Meeting?
 - ii. What do you plan to complete by the next Crisis Response Meeting?
 - iii. Any unexpected issues or barriers?
 - c. Status Update from the following (illustrative and subject to change based on the type of crisis):
 - i. General Counsel / Legal
 - ii. Finance
 - iii. Communications
 - iv. IT
 - v. Commercial
 - vi. Retail
 - vii. Generation
 - viii. Nuclear
 - ix. Administration
 - x. ERM
 - xi. EHS
3. **Key Decisions, Meetings, and Milestones**
 - a. Discuss key decisions made and response accomplishment
 - b. Identify upcoming milestones and/or roadblocks
 - i. Identify whether any non-activated Extended Team Members need to be activated/involved
4. **Information Sharing & Communication Strategy**
 - a. Discuss whether the engagement strategy needs to change as a result of updates or decisions made during the meeting
 - b. Discuss whether any external and/or internal stakeholders need additional communication or support
 - c. Discuss whether actions or decisions need to be escalated to the CEO and/or the Board of Directors for awareness or approval
5. **Next Steps and Accountability**
 - a. Revisit any outstanding action items
 - b. Set priorities and assign actions and deadlines
 - i. Crisis Response Lead will record actions and follow-up with team members when necessary

Post-Meeting Logistics (Crisis Response Coordinator)

1. Set up the next meeting (call) time and/or place, send notice to team(s)
2. If needed, identify other people/teams to activate/include in the next meeting
3. If needed, identify a conference room or Emergency Operations Center (EOC)
4. Update all relevant Crisis Response/Status Documents with the Crisis Response Team Meeting discussion points/outcomes
5. Share Crisis Response Documentation and Actions
 - a. All documentation should be sent to the activated Crisis Response Team members. The non-activated Extended Team should be cc'ed on the emails (if appropriate)
 - b.
 - c.

Appendix J: Crisis Response Daily Status Update Template

Workstreams should leverage the Daily Status Update template to report progress to the Lead and aid information sharing across workstreams.

Vistra ECRP Workstream Team Report		[Event]
Update	Date:	Time:
Current Status & Ongoing Response Efforts		Updating Party
<ol style="list-style-type: none"> 1. (Not applicable for the first meeting) Has the severity level of the situation changed since the previous report? 2. What key accomplishments have been achieved? 3. Have there been newly identified issues? If so, do new core team members need to be activated? 4. Do we continue to have the resources needed to manage our response efforts? 5. Have there been any notable lessons learned regarding the crisis response? 		
Information Sharing & Communications Strategy		Responsible Party
<ol style="list-style-type: none"> 1. Are updates or changes to our communications/messaging required? 2. What internal stakeholders need to be communicated with? What do they need to know? 3. What external stakeholders need to be communicated with? What do they need to know? 		
Next Steps & Accountabilities		Responsible Party/Timing
<ol style="list-style-type: none"> 1. What are the immediate priorities? 2. What tactical actions need to be assigned and who should be accountable for them? When are they due? 3. What milestones are approaching and when? Are they achievable? 4. What key decisions are pending? 5. What roadblocks are we facing? 		
Resources – located on Event Crisis Response Cloud Storage Site		
<ul style="list-style-type: none"> • • 		

Appendix K: Key Decision Log

The Key Decision Log should be updated by the Crisis Response Lead and shared along with the Situation Report.

Decision Log							
#	Date/Time	Decision	Decision Maker	Rationale/ Justification	Follow Up(s) Required	By When	By Who

Appendix L: Glossary

Term	Definition
Business-as-usual (BAU)	The normal state of business operations
Business disruption	Disturbance of any size to normal business operation
Business Units (BU)	Segments of the Vistra business, including Wholesale Generation (Texas, East, West), Retail Electricity, and Asset Closure
Catastrophic	Involving or causing sudden devastating damage to the organization
Enterprise Crisis Response Plan	The formal, written, guidance document or “Plan” Vistra has authorized to be used to respond to a crisis at Vistra
Crisis Response Core Team	This team, led by the Crisis Response Lead, will manage crisis responses and will activate the relevant Enterprise Crisis Response Extended Team members to deliver an enterprise-wide crisis response
Crisis Response Extended Team	This team consists of other departmental points of contact that may be called upon by the Crisis Response Lead and the Enterprise Crisis Response Core Team to support responses, depending on impact facts and circumstances. Non-activated Crisis Response Extended Team members shall be informed of the crisis response details throughout the lifecycle to promote their readiness to actively participate in the response, if/when required.
Governance	The established structure and system used to govern or “oversee” the Enterprise Crisis Management Program
Functional Area Lead	A functional area lead is a point person within a functional area that is trained to identify and escalate a situation/issue that has potential to be a crisis
Potential	Having or demonstrating the capability to develop into actuality
Prepare	The Prepare phase maintains a continuous improvement life cycle including planning, educating, exercising, evaluating lessons learned, and updating plan
Respond	The second phase in the Crisis Management lifecycle which encompasses the immediate investigation, containment and response to the situation.
Recover	The final phase of the Crisis Management lifecycle, which encompasses all tactical, operational and strategic activities to guide Vistra through the remediation of the crisis, positioning the company to emerge stronger and return to a state of normal (though potentially transformed) business operations.
Severe	Critical or condemnatory impact to the business operation, potentially resulting in a loss of business operations
Significant	Sufficiently great or important enough to be noteworthy for Vistra Corp Executives



Infectious Disease and Pandemic Readiness and Response Plan

Vistra Corp.
6555 Sierra Drive
Irving, TX 75039

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Corporate Overview

Vistra (NYSE: VST) is a leading Fortune 275 integrated retail electricity and power generation company based in Irving, Texas, providing essential resources for customers, commerce, and communities. Vistra combines an innovative, customer-centric approach to retail with safe, reliable, diverse, and efficient power generation. The company brings its products and services to market in 20 states and the District of Columbia, including six of the seven competitive wholesale markets in the U.S. and markets in Canada and Japan, as well. Serving nearly 4.3 million residential, commercial, and industrial retail customers with electricity and natural gas, Vistra is one of the largest competitive electricity providers in the country and offers over 50 renewable energy plans. The company is also the largest competitive power generator in the U.S. with a capacity of approximately 39,000 megawatts powered by a diverse portfolio, including natural gas, nuclear, solar, and battery energy storage facilities. In addition, Vistra is a large purchaser of wind power. The company owns and operates the 400-MW/1,600-MWh battery energy storage system in Moss Landing, California, the largest of its kind in the world. Vistra is guided by four core principles: we do business the right way, we work as a team, we compete to win, and we care about our stakeholders, including our customers, our communities where we work and live, our employees, and our investors.

The Vistra infectious disease and pandemic readiness and response strategy is based on a two-part goal: to prevent transmission and to sustain essential services. To accomplish this goal, Vistra identified critical response groups and worked with subject matter experts and key stakeholders to develop response tactics for use during an outbreak. This plan describes (a) the scope of the plan, (b) the command and control framework that will guide our response, (c) the events that will trigger steps in our response plan, (d) the types, quantities, and distribution procedure for our virus/flu prevention materials, and (e) the tactics that each pandemic response group will execute at each step of the plan.

Scope

This plan will guide the response of both the enterprise in general and impacted sites and employees specifically with the aim of anticipating, preparing for, and limiting the impact of any infectious disease outbreak that could be transmitted in a work place setting and has the potential of impacting our ability to continue operations. The plan does this by focusing on steps appropriate to control the spread of a disease by using tools focused on hygiene, sanitation, and limiting personal contact to the extent suggested or required by the Centers for Disease Control or local, state, national, or foreign governments.

This plan does not address diseases that are covered by other plans, such as Bloodborne Pathogens. The plan does not provide specific guidance for Business Continuity efforts that would be required for certain control measures such as reduced travel or work-from-home staffing. The plan assumes all business units' Business Continuity Plans will guide their respective efforts.

This plan does not address planning related to Vendor locations but does highlight certain steps the Company should do to ensure Vendors have their own plans enough to satisfy the Company's business needs.

Command Structure

Because Vistra operates facilities in multiple states and several countries, control during the Company's response to a pandemic is designed to have the operational flexibility necessary to accommodate the needs of different sites in different states and countries.

The Chief Administrative Officer, through the Director of Corporate Security and Business Continuity, will manage the plan and direct the efforts of the Pandemic Preparation and Response Team.

The permanent members of the response team are listed below an

1. Chief Information Officer
2. SVP, Government Affairs
3. VP, Human Resources
4. SVP, Regulatory Affairs
5. SVP, Environmental Health & Safety
6. SVP, Supply Chain
7. Senior Director, Facilities and Real Estate
8. Chief Spokesperson
9. Director, Corporate Security and Business Continuity

Each permanent member may elect to designate a representative as a Team Member. Other business units may provide support as needed at either the Team's request or at the Business Unit's request to ensure all equities are appropriately represented. This may include Compliance officers of various business and representatives of the business units such as Generation, Commercial, and Retail.

The team's charter is to maintain this plan and implement their respective actions for preparation and execution. The team is responsible for reviewing the health implications of any developing situations that may require this plan's execution. The team will make

recommendations to the CAO who will then approve the action or obtain approval from Company leadership as is appropriate.

The below table lists the general expectations and duties of each:

Group Leader(s)	Charter
Chief Information Officer	
SVP, Gov't Affairs / VP Regulatory Affairs	
VP, HR	
VP, Safety and Environmental Health	-
VP, Supply Chain	-
Sr. Director Facilities	-
Dir Corp Communications	-
Dir of Corp Security/BC	
Chief Information Officer	-

Strategy

The Vistra strategy is focused on reducing the risk of exposure by managing employee behavior, maintaining a healthy work environment, and when necessary, reducing, relocating, or stopping certain activities. Since limiting contact to potentially infected people, the bulk of efforts in the plan are focused on methods to do that.

There are certain functions that cannot be readily conducted elsewhere, and it is in those locations where the priority is placed in ensuring protective equipment/clothing, training, and medical support is available to those workers required to work in those spaces.

The below list shows locations of critical functions can only be performed if team members are able to use very specialized equipment and/or perform their essential duties in specific rooms located in several Vistra facilities.

Critical Function	Specific Room/Areas	Facility Name	Business Owner
Building Security			CAO
Security Operations Support			CAO
Commercial Trading/Operations			Commercial
Plant Operations Support			Generation
Plant Operations			Generation
Plant Operations (Nuclear)			Generation
Plant Operations (Nuclear)			Generation
Plant Operations Oversight			Generation
Plant Operations Oversight			Generation
Retail Customer Support Management			Retail
Data Availability			Tech Services

Incident Management

The Vistra plan is designed to flow from pre-outbreak through full pandemic to recovery. As indicated earlier, locations may be impacted differently by an outbreak so locations may be at different stages of the plan, or the Company may direct a higher plan stage than is indicated by local conditions.

The stages anticipated by the plan are:

1. **Ready:** This stage is active at any time no other stage of this plan has been activated. Ready actions are focused on ensuring the plan is current, viable, and that the Company leadership is aware of any potential threats that may require this plan to be used.
2. **Prevent:** This stage commences when a determination is made by the CAO, Management Committee, or CEO that a potential for the spread of an infectious disease requires some actions within this plan. Prevention actions are focused on taking actions to limit Vistra employees to potential exposure. The level of risk to exposure will dictate the actions to be taken. The Team and CAO will implement or recommend any of the actions listed in the Prevent Category.
3. **Contain:** This stage commences when any employee is suspected or known to have been exposed to the disease and the stage applies generally only to the specific site at which the employee is working and any other sites the employee may have visited within the contagion period of the disease. The focus of this stage is to limit and eliminate the risk to other employees by returning the workspace to a pre-containment condition. There is no approval required to move from Prevent to Contain. Once containment actions are completed, the site(s) would return to the Prevent stage.
4. **Recover:** This stage commences upon approval from the CAO after the risk has been neutralized. This stage is focused on returning all functions to a normal state as well as replenishing any supplies and equipment used during the risk event. An after-action review is also part of this stage.

Since no two events are the same and the variety of threats cannot be fully anticipated, a range of steps can be planned and made available during the incident at the discretion of management. The below attachments contain the range of options that can be considered and where appropriate, their impact to the business, and required approval level.

Attachment 1: Ready Steps

Attachment 2: Prevent Step

Attachment 3: Contain Steps

Attachment 4: Recover Steps

[illegible]

[illegible]

Attachment 4: Recover Steps

[illegible]

0060	<div>LOCATION</div> <div>Vistra Retail ERCOT Region</div>	<div>PROCEDURE NUMBER</div> <div>Vistra Texas Retail Electric Provider (REP) Operations Plan</div>
	<div>REP EMERGENCY OPERATIONS PLANS</div>	<div>Author</div>
		<div>Rev Date</div> <div>4/15/2022</div>
	<div>Approval</div> <div>President Vistra Retail</div>	<div>Page 1 of 12</div>

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<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
	<p>Rev Date</p> <p style="text-align: center;">4/15/2022</p>
<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: center;">Page 2 of 12</p>

REVISION HISTORY

Rev #	Revision, Approval, and Effective Date	Description of Change	Reason
0	4/15/2022	Initial revision	Creating corporate standard for compliance with PUCT §25.53. Electric Service Emergency Operations Plans for a Retail Electric Provider

0062	<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
	<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
		<p>Rev Date</p> <p style="text-align: center;">4/15/2022</p>
	<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: center;">Page 3 of 12</p>

1.0 Approval and Implementation

The Vistra Retail Emergency Operations Plans (EOP) is applicable to all Vistra ERCOT Retail Electric Providers (REP) and will be implemented as herein described.

The Senior Director, Corporate and Retail Compliance is responsible for maintaining and implementing the EOP and changing or revising the EOP.

This current EOP supersedes any previous revisions to the EOP.

2.0 Objectives

To establish the procedures to respond to, mitigate and recover from emergencies that will minimize risks and impacts to Retail personnel, customers, and vendors. It is intended that this plan will make clear to all Retail personnel the actions that they are required to take if an emergency situation develops,

3.0 Overview of the Emergency Operations Plans

Retail Personnel will respond to fires that can be extinguished with handheld fire extinguishers and provide first aid/CPR to injured personnel until Emergency Agencies arrive.

In the event that a larger emergency occurs, Retail personnel will evacuate the area.

All other emergency responses will be performed by Emergency Agencies whose purpose is “Emergency Response”. These agencies will respond to emergencies such as:

- Hazardous Waste
- Gas Leak
- Fire/Explosion
- Active Shooter

4.0 Regulatory References

This EOP has been developed to ensure compliance with certain emergency actions relating to retail operations as required by Public Utility Commission of Texas (PUCT) §25.53 Electric Service Emergency Operations Plans. Recognizing that the PUCT rules may change from time to time and this plan will need to be updated with the latest information required by the rules. The rules can be found at this PUCT website link (<http://puc.texas.gov/agency/ruleslaws/Default.aspx>).

0063	<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
	<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
		<p>Rev Date</p> <p style="text-align: right;">4/15/2022</p>
	<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: right;">Page 4 of 12</p>

5.0 Communications Plan

Vistra Retail maintains transparent communications with our customers and other third parties before, during and after emergency events, providing as much information as possible for their safety, available assistance resources and account information. Refer to Vistra Communications Plan – ERCOT Only for more information.

6.0 Administration

All copies of this Retail EOP that are distributed by paper copy or electronic copy must be accounted for on Attachment 1 – Emergency Operations Plans Distribution List.

7.0 Training

All Retail leaders shall receive training on this Emergency Operations Plans whenever it is modified or on at least an annual basis.

Employees will also be trained when this plan is initially implemented

8.0 Supplies for Emergency Response

Vistra REPs have an inventory of pre-arranged supplies at their corporate offices for emergencies associated with weather, fire or explosions, or pandemics, as appropriate for maintaining business continuity during an emergency. Vistra REPs regularly check these supplies and restock as appropriate.

9.0 Staffing for Emergency Response

Each site will maintain a staffing plan that ensures adequate staffing levels necessary for Emergency Response to an emergency involving a specified type of hazard or threat. Non-Emergency staffing levels include customer service lines that are either available 24/7, or operate under extended business hours (e.g., 7am to 10pm, 7 days/week).

Any staffing issues should be immediately communicated to the Vistra Crisis Response Team (if the Enterprise Crisis Response Plan is activated) or to the Crisis Response Coordinator.

0064

<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
	<p>Rev Date</p> <p style="text-align: right;">4/15/2022</p>
<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: center;">Page 5 of 12</p>

Attachment 1 - Emergency Operating Plan Distribution List
(Page 1 of 1)

Copy #	Location

0065	<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
	<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
		<p>Rev Date</p> <p style="text-align: center;">4/15/2022</p>
	<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: center;">Page 6 of 12</p>

Attachment 2 - Weather Emergency Response

Weather emergencies considered in this procedure are associated with weather disturbances such as hurricanes, tornadoes, flooding, severely cold weather, severely hot weather, and severe thunderstorms.

Staffing

Staffing for weather-related emergencies shall be dependent upon the time frame of the emergency. Designated staff shall remain on-site or shall travel to the site as soon as possible to provide direction and support.

Preparing for Weather Emergencies

Advance planning and quick response are the keys to minimizing effects of weather emergencies.

- Maintain emergency supplies:
 - Flashlight and extra batteries
 - Portable, battery-operated radio and extra batteries
 - First aid kit and manual
 - Emergency food and water
 - Essential medicines
- Plan an escape route in case of evacuation
- Designate emergency shelter areas in the building
- Conduct weather emergency drills

Warnings in Advance of Weather Emergencies

Warnings about developing weather emergencies are issued by the National Weather Service website. These warnings should provide adequate information of the approach of weather-related emergency conditions. Other monitoring tools include:

- Internet access to weather-related websites (e.g. AccuWeather.com),
- Local news stations (e.g., cable TV, AM/FM radio), and
- Local Air Monitoring Station.

During a Weather Emergency

The following steps should be taken during a weather emergency that occurs during business hours:

- Listen to the radio or TV for information and instructions,
- See cover immediately in designated shelter area (if evacuation is not feasible), and
- Stay in shelter area until told evacuation is safe.

UNDER NO CIRCUMSTANCES SHOULD ANYONE SEEK SHELTER IN A PERSONAL VEHICLE, COMPANY VEHICLE, OR EXTERNAL WALL AREA WITH WINDOWS.

0066	<p style="text-align: center;">LOCATION</p> <p style="text-align: center;">Vistra Retail ERCOT Region</p>	<p style="text-align: center;">PROCEDURE NUMBER</p> <p style="text-align: center;">Vistra Texas Retail Electric Provider (REP) Operations Plan</p>
	<p style="text-align: center;">REP EMERGENCY OPERATIONS PLANS</p>	<p>Author</p>
		<p>Rev Date</p> <p style="text-align: center;">4/15/2022</p>
	<p>Approval</p> <p style="text-align: center;">President Vistra Retail</p>	<p style="text-align: center;">Page 7 of 12</p>

For weather emergencies that occur outside of business hours, management will send out communications to employees regarding the weather event and its impact, if any, on business operations. These communications will provide employees with guidance on the operating status of business facilities and other relevant information.

After a Weather Emergency

Once it has been determined that it is safe to leave the shelter area, the following steps should be taken.

- Help injured or trapped persons,
- Give first aid when appropriate,
- Call for help (e.g., 911)
- Clean up spilled medicines, bleaches, or other flammable liquids immediately
 - Leave the buildings if you smell gas or chemical fumes
- Watch for fire hazards such as damaged electrical wires or gas leaks
 - When checking gas leaks – if you smell gas or hear a blowing or hissing noise, open a window and quickly leave the building. Call for emergency services.
 - When checking electrical system damage – if you see sparks or broken or frayed wires, or if you smell hot insulation, turn off the electricity at the main fuse box. Call for emergency services.
 - When checking for sewage and water line damage – if you suspect sewage lines are damaged, avoid using toilets and call a plumber. If water pipes are damaged, contact the water company and avoid using water from the tap.

Activation of EOP

Activation of this EOP due to weather related issues should be communicated to the Vistra Crisis Response Team (if the Enterprise Crisis Response Plan is activated) or to the Crisis Response Coordinator.

0067	LOCATION Vistra Retail ERCOT Region	PROCEDURE NUMBER Vistra Texas Retail Electric Provider (REP) Operations Plan
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Attachment 3 - Pandemic/Endemic Response

Refer to the Vistra Infectious Disease and Pandemic Readiness and Response Plan.

0068	LOCATION Vistra Retail ERCOT Region	PROCEDURE NUMBER Vistra Texas Retail Electric Provider (REP) Operations Plan
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Attachment 4 - Cyber Security Threat Response

0069	<div>LOCATION</div> <div>Vistra Retail ERCOT Region</div>	<div>PROCEDURE NUMBER</div> <div>Vistra Texas Retail Electric Provider (REP) Operations Plan</div>
	<div>REP EMERGENCY OPERATIONS PLANS</div>	<div>Author</div>
		<div>Rev Date</div> <div>4/15/2022</div>
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Attachment 5 - Physical Security Threat Response

0070

<small>LOCATION</small> Vistra Retail ERCOT Region	PROCEDURE NUMBER Vistra Texas Retail Electric Provider (REP) Operations Plan
REP EMERGENCY OPERATIONS PLANS	Author
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<div>LOCATION</div> <div>Vistra Retail ERCOT Region</div>	<div>PROCEDURE NUMBER</div> <div>Vistra Texas Retail Electric Provider (REP) Operations Plan</div>
<div>REP EMERGENCY OPERATIONS PLANS</div>	<div>Author</div>
	<div>Rev Date</div> <div>4/15/2022</div>
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 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
	EMERGENCY OPERATING PLAN	Author Jamie Dugan
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REVISION HISTORY

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0	4/15/2022	Initial revision	Creating corporate standard for compliance with PUCT §25.53. Electric Service Emergency Operations Plans

0074	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
		EMERGENCY OPERATING PLAN	Author Jamie Dugan
			Rev Date 4/15/2022
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1.0 Approval and Implementation

The Luminant ERCOT Region Emergency Operating Plan (EOP) is applicable to all Luminant ERCOT Generating Facilities and will be implemented as herein described.

The Emergency Operating Plan outlined in this document establishes the planned response actions that will be taken by personnel at the Site in the event of an emergency situation to ensure maximum safety of Site Personnel.

When activated, the Emergency Operations Center serves as the Luminant Fleet Command and Control under the direction of the Emergency Director.

The Senior Director, POC Fleet Performance is responsible for maintaining and implementing the EOP, and changing or revising the EOP.

This current EOP supersedes any previous revisions to the EOP.

2.0 Objectives

To establish a pre-planned set of actions that are to be taken when an emergency occurs that will minimize health risks to plant personnel and people in the surrounding community, as well as minimize adverse impacts to the environment. It is intended that this plan will make clear to all plant personnel the actions that they are required to take if an emergency situation develops.

3.0 Overview of the Emergency Operating Plan


Plant Personnel will respond to incidental spills of chemicals that can be controlled by employees in the immediate release area, to fires that can be extinguished with handheld fire extinguishers and provide first aid/CPR to injured personnel until Emergency Agencies arrive.

In the event that a larger emergency occurs, plant personnel will evacuate the area of the spill, leak or fire.

All other emergency response at the Site will be performed by Emergency Agencies whose purpose is “EMERGENCY RESPONSE”.

4.0 Regulatory References

The plan includes information for Luminant sites in Texas required by the Public

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Utility Commission of Texas (PUCT) ruling 25.53 Electric Service Emergency Operations Plans. Recognizing that the PUCT rules may change from time to time and this plan will need to be updated with the latest information required by the rules. The rules can be found at this [PUCT website](http://puc.texas.gov/agency/ruleslaws/Default.aspx) link (<http://puc.texas.gov/agency/ruleslaws/Default.aspx>).

The Emergency Operating Plan must be reviewed for accuracy by the Plant Manager.

5.0 Communication Plan

Coordinate communications to organizations outside of Luminant through Vistra Community Affairs.

Examples of organizations outside of Luminant: the media; the commission; Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers; and the applicable reliability coordinator.

Communicate contact with organizations outside of Luminant to the Emergency Director at the Emergency Operations Center

6.0 Administration

Each Site will certify Emergency Operating Plan readiness by submitting Attachment 1 - Certification of Emergency Operating Plan.

All copies of this Emergency Operating Plan that are distributed by paper copy or electronic copy must be accounted for on Attachment 3 – Emergency Operating Plan Distribution List and submitted with Attachment 1 - Certification of Emergency Operating Plan.


Paper copies of this Emergency Operating Plan shall be maintained at the plant control room at all times.

An electronic copy of this plan will also be accessible on each facility's LAN.

This plan will be reviewed upon implementation, whenever revisions are made, and at least annually by Luminant personnel.

7.0 Training

All Luminant employees at the facility shall receive training on this Emergency Operating Plan whenever it is modified or on at least an annual basis.

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Employees will also be trained when this plan is initially implemented.

Contractors and visitors who will enter operating areas of the facility will be trained on emergency notifications, mustering locations and evacuation procedures before they enter the facility for the first time, and at least annually thereafter.

8.0 Supplies for Emergency Response

Each site maintains a supply list for certain emergency situations, such as cold weather.

Each site maintains appropriate supplies that are necessary for Emergency Response to an emergency involving a specified type of hazard or threat.

Communicate discrepancies from supply plan to the Emergency Director at the Emergency Operations Center

9.0 Staffing for Emergency Response

Each site will maintain appropriate staffing that ensures adequate staffing levels necessary for Emergency Response to an emergency involving a specified type of hazard or threat.

Communicate staffing issues to the Emergency Director at the Emergency Operations Center

10.0 Weather Related Issues


Each site will maintain a process to identify weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the site follows to activate the Emergency Operating Plan.

Coordinate Emergency Operating Plan activation through the Emergency Director at the Emergency Operations Center.

11.0 Site General Emergency Procedure

This emergency plan was developed for the following plausible contingencies that could transpire at the facility:

- Hot/Cold Weather Emergency response
- Fuel Switching Equipment (if applicable)

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- Staffing during applicable emergencies
- Water Shortage (Drought) response
- Restoration after failed start or trip related to a hazard or threat
- Pandemic/Endemic response
- Hurricane response (if located with applicable zone)
- Cyber Security threat response
- Physical security threat response
- Any additional appendixes, as deemed necessary by the facility

It will be the responsibility of the designated Emergency Coordinator to assess a developing emergency situation and initiate the appropriate actions in this plan to protect personnel, the surrounding environment, and plant equipment from adverse damages.

In the event of an emergency, the following actions will be immediately performed:

- If the event is a fire, medical, or police emergency, contact 911 immediately.
- If the event is a fire emergency, medical emergency, police emergency or weather-related emergency, ensure that the following are also contacted: Plant Manager, Operations Manager, Safety Specialist, Emergency Operations Center
- If the event is a chemical spill or other environmental contingency, contact all of the above and Site and Corporate Environmental Specialists.
- Work related activities will cease and appropriate actions taken to protect personnel.
- All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.
- Based upon the type and extent of the emergency, the designated Emergency Coordinator should assess whether an evacuation should be initiated. The following criteria should be considered in rendering a decision to conduct an evacuation of the facility:
 - The affected parts of the facility and severity of the emergency.
 - Restrictions in egress routes caused by the emergency.
 - Wind direction (if the emergency involves gases/vapors)
 - People currently located at the facility (day shift, night/weekend shift, visitors/contractors, etc.)


0078

 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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If a facility evacuation is necessary, the designated Emergency Coordinator must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

Immediate Site Evacuation

Delayed Site Evacuation

0079	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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12.0 Emergency Operating Plan Annual Drill

An Emergency Operating Plan Drill is held annually if the Emergency Operating Plan has not been activated in the previous year.

Typical drill scenarios and a drill evaluation sheet are on the forms section of Smart Procedures.

Following an annual drill Luminant must assess the effectiveness of its emergency response and revise its EOP as needed.

If a site operates in a hurricane evacuation zone as defined by TDEM, the annual drill must include a test of its hurricane annex.

0080	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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Attachment 1 - Certification of Emergency Operating Plan – Renewables/Battery
Storage/ Fossil Operations
(Page 1 of 1)

To: Barry Boswell, EVP Renewables/Battery Storage/Fossil Operations

Subject: Certification of Emergency Operating Plan 2022

This document certifies that <Site> has an Emergency Operating Plan in place that includes, at a minimum, the below items


- Documented Emergency Operating Plan, including:
 - Communication Plan
 - Supplies for Emergency Response
 - Staffing for Emergency Response
 - Weather Related Issues (Tornadoes, Hurricanes (if applicable), etc.)
- Relevant Appendixes, including:
 - Hot/Cold Weather Emergency response
 - Fuel Switching Equipment (if applicable)
 - Staffing during applicable emergencies
 - Water Shortage (Drought) response
 - Restoration after failed start or trip related to a hazard or threat
 - Pandemic/Endemic response
 - Hurricane response (if located with applicable zone)
 - Cyber Security threat response
 - Physical security threat response
 - Any additional appendixes as deemed necessary by the facility

Attachment 3 documents the distribution of the Emergency Operating Plan

<Name here>, Fossil Complex Director or Plant Manager Date

*****CONCURRENCE*****

<Name here>, Regional VP Date

0081	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
		EMERGENCY OPERATING PLAN	Author Jamie Dugan
			Rev Date 4/15/2022
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Attachment 2 - Certification of Emergency Operating Plan – Comanche Peak Nuclear Power Plant
(Page 1 of 1)

To: Ken Peters, SVP and Chief Nuclear Officer

Subject: Certification of Emergency Operating Plan 2022

This document certifies that Comanche Peak Nuclear Power Plant has an Emergency Operating Plan in place that includes, at a minimum, the below items

- Documented Emergency Operating Plan, including:
 - Communication Plan
 - Supplies for Emergency Response
 - Staffing for Emergency Response
 - Weather Related Issues (Tornadoes, Hurricanes (if applicable), etc.)
- Relevant Appendixes, including:
 - Hot/Cold Weather Emergency response
 - Fuel Switching Equipment (if applicable)
 - Staffing during applicable emergencies
 - Water Shortage (Drought) response
 - Restoration after failed start or trip related to a hazard or threat
 - Pandemic/Endemic response
 - Hurricane response (if located with applicable zone)
 - Cyber Security threat response
 - Physical security threat response
 - Any additional appendixes as deemed necessary by the facility


Attachment 3 documents the distribution of the Emergency Operating Plan

<Name here>, Plant Manager Date

*****CONCURRENCE*****


<Name here>, VP Site Date

0082

 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
	EMERGENCY OPERATING PLAN	Author Jamie Dugan
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Attachment 3 - Emergency Operating Plan Distribution List
(Page 1 of 1)

Copy #	Location

 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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Attachment 4 - Hot / Cold Weather Emergency Response

Natural emergencies considered in this procedure are associated with weather disturbances such as hurricanes, tornadoes, flooding, severely cold weather, severely hot weather, and severe thunderstorms. Flooding waters, high winds, excessively reduced or elevated ambient temperatures, and heavy rains may be detrimental to the employees and or equipment and structures at the facility. Warnings about developing weather emergencies are issued by local radio stations. These warnings should provide adequate information of the approach of weather-related emergency conditions. The Designated Emergency Coordinator at the facility has several means to monitor these weather-related emergencies.

STAFFING-

Facility staffing for weather-related emergencies shall be dependent upon the time frame of the emergency. For all weather-related emergencies, the current operating team shall remain onsite until appropriately relieved by the oncoming team. Designated staff shall remain on-site or shall travel to the site as soon as possible to provide direction and support.

A site-specific checklist shall be utilized to address SEVERE weather-related emergencies. Perform tasks, if applicable for site.

When information is received that a severe weather or tornado watch/warning has been issued for the facility area, the site shall take immediate actions to ensure safety of personnel and equipment.

The POC shall aid in the monitoring of plant conditions.


After the storm, personnel shall determine what damage and risk exist in the work areas and mitigate the risk before resuming work in an area.

EVACUATION TO TORNADO SHELTER AND/OR ALTERNATE DESIGNATED SHELTERS

In the event that an evacuation to a designated shelter area occurs during higher than normal staffing times, contractors will be directed to an alternate designated shelter area.

UNDER NO CIRCUMSTANCES SHOULD ANYONE SEEK SHELTER IN A MOBILE BUILDING, PERSONAL VEHICLE, COMPANY VEHICLE, OR EXTERNAL WALL AREA WITH WINDOWS.

Cold Weather Plan

 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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Site prepares for the reliability of generation assets and supplementary systems during the winter period through the use a winter readiness procedure and a site specific check sheet (Winter Readiness Checklist). The inspections and checks include but are not limited to:

- a) Inspection and maintenance of insulation quality for piping, instrumentation, and water lines.
- b) Inspection and maintenance of insulation quality for instrumentation systems, instrument sensing lines, and control valves.
- c) Freeze Protection Assessment
- d) Review of generator fuel supply and delivery contracts.
- e) Check Fluid filled systems using Anti-Freeze for freeze protection/Fuel Systems
- f) Building/Equipment Enclosure checks
- g) Winter Supplies check

Luminant has implemented lessons learned into the winter preparation procedures / checklists.


Hot Weather Plan

Site prepares for the reliability of generation assets and supplementary systems during the summer period through the use a summer readiness procedure and a site specific check sheet (Summer Readiness Checklist).

Luminant has implemented lessons learned into the summer preparation procedures/checklists.


Staffing During Severe Weather Events

Site utilizes the Emergency Response Plan when preparing for severe weather events. Staffing is one part of the plan. The site is staffed 24/7 and is adjusted on a case-by-case basis based on the weather event and specific needs of the site.

0085	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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Attachment 5 - Fuel Switching Equipment (if applicable)

If alternate fuel sources are available, site will switch to the alternate fuel supply, as directed by site specific operating procedures during periods of primary fuel curtailment, or as directed by dispatcher.

0086	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
		EMERGENCY OPERATING PLAN	Author Jamie Dugan
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Attachment 6 - Staffing During Applicable Emergencies


Site utilizes the Emergency Response Plan when preparing for emergency events. Staffing is one part of the plan. The site is staffed 24/7 and is adjusted on a case-by-case basis based on the emergency event and specific needs of the site.

0087	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
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Attachment 7 - Water Shortage (Drought)

Site's plan for addressing emergency shortages of water focuses on maintaining access to cooling water that is needed to sustain normal plant operations during extreme drought conditions.

In addition, the site assesses the effects of potential droughts for upcoming seasons and enacts available and appropriate mitigation plans whenever there is a reasonable risk to reliability.

0088	 Luminant	LOCATION Luminant ERCOT Region (excluding Comanche Peak)	PROCEDURE NUMBER Luminant ERCOT Region Emergency Operating Plan
		EMERGENCY OPERATING PLAN	Author Jamie Dugan
			Rev Date 4/15/2022
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Attachment 8 - Restoration After Failed Start or Trip Related to a Hazard or Threat

Site will perform an inspection and evaluation of equipment and develop a plan for restoring site to service. The specific plan will depend on results from inspection and evaluation. Site will communicate with regional entities regarding the condition of the site and its generating facilities.