Filing Receipt

Received - 2022-04-18 02:41:03 PM
Control Number - 53385
ItemNumber - 339

TABLE OF CONTENTS

1.0 PURPOSE

This Emergency Operations Plan (this "EOP" or "Plan") of BT Cooke Solar, LLC ("BT Cooke") provides guidance and direction to the facility with respect to the emergency operations plan requirements as a Power Generation Company (PGC) under Chapter 25 of the Public Utility Commission of Texas (PUCT) Electric Substantive Rules.[1]

2.0 EMERGENCY CONTACTS

The following list includes primary and backup emergency contacts for BT Cooke who can immediately address urgent requests and questions from the PUCT during an emergency.

Primary Contacts:

- REDACTED, Senior O&M Manager, Adapture Renewables, Inc., REDACTED, REDACTED
- REDACTED, Regional Manager, DEPCOM, REDACTED, REDACTED

Backup Contacts:

- REDACTED, Senior O&M Manager, Adapture Renewables, Inc., REDACTED, REDACTED
- REDACTED, Field Technician, DEPCOM, REDACTED, REDACTED

3.0 APPROVAL AND IMPLEMENTATION

This Plan covers all in-scope Chapter 25 - Subchapter C. - Infrastructure and Reliability requirements and applies to the BT Cooke, LLC Solar facility described below:

BT Cooke Solar, LLC, a 59 MWac (nameplate) solar facility located in Cooke County, Texas. BT Cooke commenced commercial operations on December 31, 2020 and is interconnected to Oncor Electric Delivery Co. at the 138 kV Ray Roberts Switch Station, located in the Electric Reliability Council of Texas (ERCOT) footprint. DEPCOM is the Generator Operator (GOP) and the operations and maintenance (O&M) provider for the BT Cooke facility.

BT Cooke maintains a separate *Pandemic Preparedness Plan*, *Summer Weatherization Plan, and Winter Weatherization Plan.* This Plan governs emergency operations procedures generally and outlines additional emergency procedures specific to various scenarios as detailed in the attached annexes.

BT Cooke understands and affirms that corporate and facility management, with critical execution and support from the operations and maintenance (O&M) provider, will play an

[1] Chapter 25. Substantive Rules Applicable to Electric Service Providers, §25.53 Reliability and Continuity of Service

important role in maintaining an effective weatherization program for BT Cooke. It is the responsibility of all personnel to exercise good judgment in the performance of this plan.

Any questions regarding this Plan should be directed to the BT Cooke Compliance Manager.

EOP Maintenance, Implementation, and Revision

Pursuant to 16 TAC § 25.53(d)(1)(B), the following employees are responsible for maintaining and implementing the EOP, as well as those who may change the EOP. Further job responsibilities related to emergency operations are additionally outlined in Section 5.0 of this EOP.

Title	Authority (Maintain and Implement or Change EOP)
COO and General Counsel, Adapture Renewables, Inc.	Change EOP
Senior O&M Manager, Adapture Renewables, Inc.	Maintain and Implement EOP
Compliance Manager, Adapture Renewables, Inc.	Maintain and Implement EOP

Revision Control Summary

Pursuant to 16 TAC § 25.53(d)(1)(C), BT Cooke provides the following revision control summary which lists the dates of each change made to the EOP since the initial EOP filing pursuant to subsection 16 TAC § 25.53(c).

EOP Section	Version	Date of Change	Description of Change
	1.0	Dec. 23, 2020	New plan
2,3,5,6,7,8,9,10,12,13	2.0	April 18, 2022	Updated plan

Statement of Supersession

Pursuant to 16 TAC § 25.53(d)(1)(D), BT Cooke affirms as of April 18, 2022 that the current EOP (version 2) supersedes all previous EOPs.

Date of Approval

Pursuant to 16 TAC § 25.53(d)(1)(E), BT Cooke affirms that the current EOP (version 2) was approved on April 18, 2022.

4.0 ROLES AND RESPONSIBILITIES

4.1 BT Cooke Compliance Manager

4.1.1 Role – The BT Cooke compliance manager and owner of this plan.

4.1.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee the development and implementation of this plan. Ensure the Plan is up-to-date and aligns with BT Cooke's business objectives and addresses requirements.
- Oversee revisions and updates to the Plan as necessary, as well as the implementation of the revised Plan, and a review of supporting documents, as needed.
- Participate in training and drills/exercises, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this Plan are completed, in concert with the DEPCOM Plant Manager.
- Reviews and approves this Plan annually.
- Maintains evidence.

4.2 DEPCOM District Manager

4.2.1 Role – the manager of the team contracted to perform the O&M services at the BT Cooke facility.

4.2.2 Responsibilities include:

- Ensure the requirements and processes laid out in this Plan are followed by site Personnel.
- Lead Field Services in the execution of this Plan and set expectations with Field Service Technicians for safe and reliability operational performance of the facility, as detailed in this Plan.
- Participate in the development, administration, execution, and update of the plan.
- Oversee the day-to-day operation of the BT Cooke facility.
- Ensure annual drill requirements are met and submit evidence to BT Cooke upon completion and request.
- Ensure Plan training is completed by all relevant Personnel and submit evidence to BT Cooke upon completion and request.
- Participate in training and drills/exercises.

- Provide evidence to BT Cooke Compliance Manager upon completion and request.

4.3 DEPCOM Field Services

4.3.1 Role – Contracted to perform the O&M services at the BT Cooke facility.

4.3.2 Responsibilities include:

- Follow the requirements and processes documented in the Plan.
- Provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in responses to emergency events at the BT Cooke facility.
- Conduct plant readiness reviews and provide reports to District Manager and Compliance Manager.
- Participate in training and drills/exercises.
- Participate in post-incident reviews.

4.4 DEPCOM Operating Personnel

4.4.1 Role – The Operator for the BT Cooke facility.

4.4.2 Responsibilities include:

- Operates the BT Cooke site from the DEPCOM operations center in Scottsdale, AZ.
- Responsible for responding to and managing emergencies that may impact Control Center functionality, to ensure continuity of operations.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to BT Cooke upon completion and request.
- Participate in training and drills/exercises.
- Participate in post-incident reviews.

5.0 COMMUNICATION PLAN

5.1 Communication with the Media

Media inquiries are handled by BT Cooke's media and PR consultant, Antenna Group: adapturerenewables@antennagroup.com.

5.2 Communication with the PUCT

REDACTED, COO and General Counsel, and REDACTED, Compliance Manager, of Adapture Renewables, Inc, are listed as primary and back-up personnel for PUCT to contact during an emergency.

5.3 Communication with OPUC

REDACTED, COO and General Counsel of Adapture Renewables, Inc, will represent BT Cooke in communications with OPUC in the event of an emergency.

5.4 Communication with Fuel Suppliers

This does not apply to this generation facility. This is a PV generation facility with no fuel sources.

5.5 Communication with Local and State Governmental Entities, Officials, and Emergency Operations Centers

REDACTED, COO and General Counsel of Adapture Renewables, Inc., will represent BT Cooke in communications with local and state governmental entities, officials, and Emergency Operations Centers.

5.6 Communication with ERCOT

REDACTED, COO and General Counsel, and REDACTED, Compliance Manager, of Adapture Renewables, Inc, are listed as backup AR and AR respectively for ERCOT to contact during an emergency. REDACTED, Systems Architect, is the security administrator that provides ERCOT MIS system access for end users. In addition, Rico Zuniga, Regional Manager of DEPCOM, BT Cooke's O&M partner, is the designated person for the facility. He oversees operations and fields phone calls from ERCOT as needed.

6.0 PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

BT Cooke has identified the following potential critical failure points and associated supplies necessary to address issues arising in an emergency response. BT Cooke has planned remediation for each item, as noted.

Emergency Supplies for Staff:

Item	Quantity	Remediation
First Aid Kit	One (1)	Ensure the first aid kit in the storage container is fully stocked. DEPCOM Technicians are required to have a fully

Item	Quantity	Remediation
		stocked first aid kit inside their vehicle as well.
Potable Water	5 Gallons	Ensure the storage container is fully stocked.
Battery-powered radio with National Oceanic and Atmospheric Administration (NOAA) weather radio with tone alert	One (1)	Kept in storage container. Ensure Batteries are charged and stocked.
Cold weather gear that is compatible with PPE	-	DEPCOM Technicians are required to have cold weather gear inside their vehicle.

Equipment Spare Parts Inventory For Plant Operation:

Item	Quantity	Remediation
138 kV, 3000-amp Circuit Breaker, GE DT-145FK	Zero (0)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
138kV/34.5-13.8kV-66MVA Transformer, WEG Transformers	One (1)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
34.5kV 1200A Circuit Breaker, Siemens SDV7-SE	Three (3)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Capacitor Bank	Three (3)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Sungrow SG3150U-MV Inverter	Twenty (20)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Sungrow Inverter Step-up transformer – 3150 KVA .63kV/34.5kV	Twenty (20)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Nextracker NX Horizon Tracker	Forty (40)	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available
Q Peak Duo Modules LG8.3	193,704	Ensure that Preventative Maintenance tasks (PMs) – are performed and spare parts are available

Item	Quantity	Remediation
Substations Communications Equipment Enclosure SCADA, Fiber, Alarms	One (1)	Ensure that enclosure is secured and all devices are operating as installed
Olson Motor & Controls Combiner Boxes PRI-HCB-5-400-11W-G-SW-UL-N4-SRGTA	348	Ensure that enclosure is secured and all devices are operating as installed

7.0 PLAN TO ADDRESS STAFFING DURING EMERGENCY RESPONSE

DEPCOM and BT Cooke have identified the following potential site and Operation Control Center critical failure points and has planned remediation for each role, as noted. There will be no additional staffing prior or during a severe weather events/conditions, but DEPCOM is able to mobilize additional Field Services technicians, managers and/or contractors to supplement site team, as needed.

Role	Notes	Remediation
Field Technicians	1-Full time technician onsite	If all field technicians are unavailable, additional personnel may be dispatched, as approved by the District Manager, for relocation to supplement facility staffing.
Operations Center	24-Hour Operations, staffed with 1-5 operators depending on time of day	Call in additional operations staff to ensure complete staffing of the operations center
District Manager	1-District Manager	If the District Manager is unavailable, other senior management will assist.

8.0 SEVERE WEATHER PLANNING/IDENTIFICATION AND PROCESS FOR EOP ACTIVATION

Severe weather can negatively impact the BT Cooke facility. Events and disturbances that can occur in and around the facility include but are not limited to windstorms, tornadoes, hurricanes, severe lightning storms, flooding, excessive heat, excessive cold, snowstorms, and ice storms. These weather events can be detrimental to the employees and or equipment and structures at the facility. Prior to any severe weather event, Personnel should utilize the plans and checklists contained in the weatherization plans, to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those plans.

Note that the nature of solar facilities is such that if there is no irradiance, the plant will shut down energy production, therefore output during some seasonal weather events (e.g., snow or

heavy cloud-cover) is reduced or terminated. Post-event, the District Manager and Field Services technicians will assess the damage and report the current generating capability of the site (priority for recovery of generation capacity) to DEPCOM Operating Personnel.

8.1 Pre-season Planning

Ahead of each summer and winter season, the District Manager ensures that the appropriate weatherization plan is reviewed, and the pre-season preparedness checklists are completed and signed. Annual review of the checklists is documented and stored in specified database or information repository. This activity coincides with the required ERCOT reporting, per the Nodal Protocols. Checklists specific to Winter and Summer Weatherization Plans are contained within those specific documents. For event response checklists for other scenarios, see the appropriate Attachment included in this Plan.

8.2 Identifying Weather Hazards

Warnings about developing weather emergencies are issued by local radio stations or tracked by onsite weather systems. These warnings should provide adequate information of the approach of weather-related emergency conditions. The District Manager and Operating Personnel are responsible for keeping abreast of forecasted severe weather events and reporting potential issues to the District Manager and has several means to monitor these weather-related emergencies, including:

- Internet access to weather-related websites;
- Onsite weather and telemetry systems;
- AM/FM radio to monitor local news;
- National Weather Service; and
- National Oceanic and Atmospheric Administration (NOAA)

Field technicians have weather applications on their phones that are used for lightening and weather alerts.

When information is received that a severe weather event such as a tornado, severely cold weather, severely hot weather, drought, or flood watch has been issued for the facility area, the following actions shall be taken:

1. The on-site Field Technicians should notify the District Manager.
2. With input from the District Manager or Operating Personnel, the Owner of the facility shall make a determination whether or not the plant should be shut down due to the potential weather event(s).

The *Winter Weatherization Plan* and *Summer Weatherization Plan* contain the inventory of pre-arranged supplies needed for emergencies. These plans are separate documents from this Plan.

8.3 Weather Condition Thresholds For Activating The EOP

The Emergency Operations Plan will be activated when certain weather conditions are met through either broadcasted severe weather alerts, or from the current weather data at the facility.

Windstorms, Tornadoes, and Hurricanes: when the facility experiences 40 mph wind gusts or sustained winds of 40 mph, the tracker equipment will automatically move into a wind stow position, which would activate the EOP. Otherwise, any wind or severe weather alert highlighting future wind speeds above 40 mph can prompt the Operating Personnel to activate the EOP.

Lightning Storms: upon receiving a broadcasted weather alert or seeing lightning in the area.

Flooding: upon receiving broadcasted flood alerts or experiencing flooding in and around the facility. Secondarily, the EOP can be activated during heavy rain events if the District Manager or Operating Personnel believe flooding may occur.

Excessive Heat: upon receiving broadcasted excessive heat alerts.

Excessive Cold, Snowstorms, and Ice Storms: upon receiving broadcasted weather forecasts that predict temperatures getting below 35 degrees Fahrenheit or when temperatures reach 35 degrees Fahrenheit or colder at the facility.

8.4 Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the plant administrative building, or other reinforced structure. Personnel should remain indoors if the severe weather is affecting the immediate area of the facility and maintain communications with the District Manager, Operating Personnel, and others.

8.5 Evacuation Zone

Per the Texas Department of Emergency Management (TDEM), the BT Cooke facility is not in a TDEM evacuation zone.[2]

9.0 RESTORATION RESPONSE TIME

There is an automatic transfer switch that connects normal stations service power to a backup utility feed at the BT Cooke facility that initiates when station service is lost. The site substation

[2] http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf

will have automatic failover power to the equipment in the substation via battery supplied DC power.

In the event of a power outage, the site will not be able to generate solar power until a field service representative performs a site assessment and manually closes breakers. The target response time for this scenario is two (2) hours after weather or safety conditions permit.

10.0 REQUIRED EMERGENCY OPERATIONS PLAN TESTING

10.1 Requirement for an Annual Drill

The PUCT requires that BT Cooke conduct or participate in one or more drills annually to test its emergency procedures if its emergency procedures have not been implemented in response to an actual event within the last 12 months.[3]

10.2 Testing

10.2.1 This Plan is tested at least once every 12 months to validate the contents and procedures in this plan. Testing may be accomplished by either of the following:

- Responding to an actual event in the preceding 12 months (i.e. since the last drill or event); or by
- Conducting a planned exercise/drill.

10.2.2 EOP drills must follow this Plan.

10.2.3 The District Manager will ensure that a drill of this Plan occurs annually. Upon completion of the drill, the District Manager will provide evidence of completion to the Compliance Manager.

10.3 Drill Requirements

10.3.1 PUCT Requirements

10.3.1.1 BT Cooke must conduct or participate in at least one drill each calendar year to test this EOP.

10.3.1.2 Following an initial drill, BT Cooke must assess the effectiveness of its emergency response and revise its EOP as needed.

[3] §25.53, Subchapter C, Item (d), page 3

10.3.1.3 If BT Cooke operates in a hurricane or evacuation zone as defined by TDEM, at least one of its annual drills must include a test of its hurricane annex.

10.3.1.4 At least 30 days prior to conducting an annual drill, BT Cooke must, at least for one drill each year, notify Commission Staff using the method and form prescribed by Commission Staff on the Commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill.

10.3.1.5 If BT Cooke has activated its EOP in response to an emergency, it is not required to conduct or participate in a drill in the calendar year in which the EOP was activated.

10.3.2 The content of each drill will be based on current needs and will be determined by the District Manager with input from the Compliance Manager, as needed.

10.3.2.1 The annual drill must include a documented evacuation of the O&M/Substation control building (if applicable).

10.3.3 A roster of drill attendees and the date the drill was conducted will be filed with this Plan and retained in the BT Cooke document repository.

10.3.4 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provided to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, or other relevant materials.

10.4 EOP Updates

10.4.1 Following the annual drill, the effectiveness of the drill and this Plan will be assessed and updated, as needed, based on feedback received and provided to the Compliance Manager by the District Manager.

10.4.2 Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the BT Cooke EOP evidence.

11.0 ANNUAL TRAINING AND PLAN REVIEW

All Personnel (inclusive of appropriate BT Cooke representatives, O&M personnel, and Operating personnel) shall receive training on this *Emergency Operations Plan* (EOP) whenever it is modified or on at least an annual basis. 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 plant alarms, mustering locations, and evacuation procedures before they enter the facility for the first time.

12.0 EMERGENCY CONTACT INFORMATION[4]

BT Cooke is required to submit and maintain emergency contact information with the PUCT. If the contact information changes, BT Cooke must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form.

13.0 REQUIRED ANNUAL REPORTING

13.1 Requirement to File Updated EOP ERCOT and PUCT

13.1.1 Both ERCOT and the PUCT require that BT Cooke file any updated version of this Plan by March 15, annually.

13.2 ERCOT Nodal Protocol Requirements

13.2.1 ERCOT Nodal Protocols 3.21(1)[5] requires BT Cooke, as a Resource Entity, to provider ERCOT with a complete copy of the emergency operations plan for each Generation Resource under the Resource Entity's control. For any jointly owned Generation Resource, the emergency operations plan shall be submitted by the Master Owner designated in the Resource Registration process. Each Resource Entity shall provide ERCOT with any updated versions of the emergency operations plan by June 1 for any updates made between November 1 and April 30, and by December 1 for any updates made between May 1 through October 31. Resource Entities shall submit all plans and updates electronically.

13.2.2 BT Cooke maintains separate plans to address summer and winter weatherization. As such, BT Cooke, as a Resource Entity, is required to provide ERCOT with any updated versions of the weatherization plan by June 1 for any updates made between November 1 and April 30, and by December 1 for any updates made between May 1 through October 31. Resource Entities shall submit all such plans and updates electronically.[6]

[4] §25.53, Subchapter C, Item (e), page 3

[5] ERCOT Nodal Protocols, Section 3: Management Activities for the ERCOT System

[6] ERCOT Nodal Protocols, Section 3, §3.21(2)

14.0 RESOURCES AND RELATED REFERENCES

BT Cooke Pandemic Plan

BT Cooke Summer Weatherization Plan

BT Cooke Winter Weatherization Plan

ERCOT

ERCOT Nodal Operating Guides webpage:

http://www.ercot.com/mktrules/guides/noperating/current

Relevant document: Section 3: Management Activities for the ERCOT System

Public Utility Commission of Texas

- Electric Substantive Rules: Chapter 25 Rules webpage

  https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- Section 25.53 - Electric Service Emergency Operations Plans

  https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.53/25.53.pdf

- Emergency Contact Annual Report and Form

  Report: http://puc.texas.gov/industry/electric/forms/emcont/EC_Forms.aspx

  Form: https://www.google.com/url?client=internal-element-cse&cx=000307803513926048484:gdphiulqjs4&q=https://www.puc.texas.gov/storm/contents/media/Contacts_Form.pdf&sa=U&ved=2ahUKEwi0rdb79-vsAhVLXM0KHVvnBmsQFjAAegQIAhAC&usg=AOvVaw1gFBbTvRpzvUMqm9Fs358D

National Oceanic and Atmospheric Administration (NOAA) webpage: https://www.noaa.gov/

National Weather Service website: https://www.weather.gov/

Ready.gov – Disasters and Emergencies webpage: list of event type and response actions (e.g. hurricane, tornado, flood, etc.): https://www.ready.gov/be-informed

ATTACHMENT 1: DESIGNATION OF EMERGENCY COORDINATORS

The BT Cooke Emergency Coordinator is responsible for specific actions detailed in this Plan (as noted). Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

BT Cooke Emergency Coordinators	
Primary Emergency Coordinator	Name: REDACTED Title: Senior O&M Manager, Adapture Renewables, Inc. Phone number: REDACTED
Alternate Emergency Coordinator	Name: REDACTED Title: Senior O&M Manager, Adapture Renewables, Inc. Phone number: REDACTED
DEPCOM Control Room Emergency Coordinators	
Primary Emergency Coordinator	Name: REDACTED Title: National Maintenance Director Phone number: REDACTED
Alternate Emergency Coordinator	Name: REDACTED Title: Control Room Manager Phone number: REDACTED

ATTACHMENT 2: EMERGENCY CONTACTS

In the event of a fire emergency, medical emergency, police emergency or weather-related emergency, ensure that the following roles are notified after emergency responders are contacted.

Title	Name	Phone Number
Compliance Manager	REDACTED	REDACTED
National Maintenance Director	REDACTED	REDACTED
Operation Control Center Manager	REDACTED	REDACTED
Operations Control Center	N/A	REDACTED
National Maintenance Director	REDACTED	REDACTED

ATTACHMENT 3: GENERAL EMERGENCY PROCEDURE

BT Cooke Location for Outside Emergency Responders

BT Cooke Solar, LLC is located at:	**199 W. Spring Creek Rd, Gainesville, TX 76240**

General Emergency Procedures

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

1. Personnel injuries and serious health conditions
2. Fires
3. Chemical releases
4. Weather-related causes
5. Threats to the facility that warn of danger to personnel
6. Pandemics
7. Sabotage Reporting
8. Other unanticipated events

It will be the responsibility of the District Manager or lead Site Technician 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.

General Emergency Protocols

1. Any work-related permits in affect shall be immediately voided, and personnel involved in such work shall cease all activities onsite.

2. All sources of ignition, including hot work, burning cigarettes, portable tools and motor vehicles shall be immediately secured.

3. Based upon the type and extent of the emergency, the Plant Lead Technician 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:

    a. The affected parts of the facility and severity of the emergency.

    b. Restrictions in egress routes caused by the emergency.

    c. Wind direction (if the emergency involves gases/vapors)

d. People currently located at the facility (employees, visitors/contractors, etc.)

4. If the District Manager or lead Site Technician determines that a facility evacuation is necessary, s/he must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

a) Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel. ***In this type of evacuation, operating area personnel should evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible.*** This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

b) Delayed Site Evacuation

This type of evacuation would be used in a serious emergency situation where non-essential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the facility. The District Manager and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the facility. ***If personnel will not be exposed to unnecessary danger to perform facility shutdown and/or place the facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.***

***NOTE**: Although the District Manager or lead Site Technician (or Facility Emergency Coordinator) may initially designate an evacuation to be a Delayed Site Evacuation, s/he should always keep in mind that conditions may change rapidly and result in the need to call for an Immediate Site Evacuation.

5. The District Manager or lead Site Technician onsite will determine if an evacuation is necessary.

6. Evacuation will be coordinated via the two-way radios. Teams will be alerted is an evacuation has been directed. If an evacuation has been directed, the District Manager or lead Site Technician shall ensure that instructions for evacuation are communicated to personnel over the plant radio system or hand-held radios. These instructions should include the following items at a minimum:

a. The type of evacuation to be performed

b. Immediate Site Evacuation

c. Delayed Site Evacuation

d. The nature of the emergency

e. The location(s) of the emergency

f. Any egress routes that should not be used by evacuating personnel (if known and applicable)

7. If an evacuation has been ordered, personnel shall follow either the **Immediate Site Evacuation Procedures** or **Delayed Site Evacuation Procedures** contained in **Attachment 4**, as appropriate, and based upon the direction of the District Manager, lead Site Technician and/or Facility Emergency Coordinator.

8. Perform the appropriate follow-up procedure(s) below, based upon the type of emergency that is occurring (See Annex section below):

- Personnel Injuries/Health Conditions
- Fire
- Chemical/Oil Spills and Releases
- Weather-related Emergencies

ATTACHMENT 4: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders. To prepare facility personnel for such contingencies, it will be the facility policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the facility at the designated location in the O&M building.

Note: Severe weather condition-related injuries are covered in the appropriate (Summer or Winter) Weatherization Plan.

Basic First Response Actions

- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.

- *If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring the AED to the scene*. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions should be commenced.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.
- If the AED is placed into operation, remain near the victim, and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, *do not attempt to move the victim*. Make the victim as comfortable as possible and apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.
- Immobilize all injured parts of the victim.
- Prepare victim for transportation if the victim can be safely moved.

Physical Shock

Symptoms

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

Electric Shock

Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

Treatment

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR and call for an AED, if required.

Burns

Symptoms

- Deep red color; or
- Blisters; or
- Exposed flesh.

Treatment

- Cooled immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

ATTACHMENT 5: SABOTAGE REPORTING

1. **Dial 911**
2. Communicate the sabotage event to all on-site personnel via two-way radio.
3. Contact Control Center Personnel to report the sabotage and coordinate reporting.

4. Control Center Personnel coordinates with the Operations Control Center Manager to escalate potential event reporting, as needed.

PHYSICAL SECURITY INCIDENT ANNEX

Fire Response Plan

The BT Cooke facility maintains this fire response plan which describes measures taken at the facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. Safe and expedient response actions are essential to protect the health and safety of plant personnel and minimize damages to plant equipment and the surrounding environment.

1. Any person who discovers a fire in the facility should immediately make radio/phone contact with the District Manager or lead Site Technician, and provide the following information:

    a) That a fire has been discovered.

    b) The location and source of the fire.

    c) Any injuries that have occurred

    d) The cause of the fire (if known)

    e) Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

    NOTE: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a plant radio. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the **immediate action is to notify others over the radio and get help**.

2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire is in its incipient stage if it meets two primary criteria:

    a) The fire can be extinguished or controlled with a single portable fire extinguisher; and

    b) The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.

3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. ***Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only***. (Note: All field/plant personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the facility. The *Fire Extinguisher Plot*, detailing the location of portable fire extinguishing equipment deployed at the facility, is provided at the end of this attachment. Additionally, the *Fire Hydrant/System Plot* details locations of key fire hydrants near or on the facility.)

4. In response to the fire, the Plant Lead Technician/Lead Technician will need to make the following determinations:

   a) The equipment or activities that need to be shut down and/or ceased.

   b) If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

Fire Extinguisher Deployment Plot – Admin/Water Treatment Areas

- BT Cooke has the following Fire Extinguishers onsite:
  - One (1) fire extinguisher located in the substation control building.
  - DEPCOM Field Technicians carry Fire Extinguishers in vehicle.
- All Extinguishers are Dry Chemical Extinguishers.

Chemical or Oil Spills and Releases

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA HAZWOPER regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) ***if it can be stopped without incurring***

additional personal exposure to the substance. An example of this might be the following:

Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area (if remaining within observation distance is safe under prevailing conditions; if in doubt, do not risk exposure – leave the area.).

3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The District Manager or lead Site Technician should be notified immediately over the radio. Information provided should include all the following that are known:

   a) What type of chemical has been spilled/released?
   b) The location(s) of the spill/release.
   c) If the source of the spill/release has been stopped
   d) If any injuries or chemical exposure has occurred to personnel.
   e) Boundaries describing the area of the spill.
   f) Whether or not the spill is contained.
   g) Quantity released.
   h) Environmental Impacts (water bodies, streams, ground, roadways).

4. Based upon the report from the person discovering the spill, the District Manager or lead Site Technician shall evaluate whether the circumstances pose a threat to the surrounding community or the environment. ***If a threat is imposed to the community or environment, 911 should be notified immediately.***

5. The District Manager or lead Site Technician shall decide as to whether the spill/release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the District Manager or lead Site Technician shall use the Spill Prevention Control and Countermeasure Plan (SPCC). The District Manager or lead Site Technician shall ensure that all required notifications are made.

6. While remaining at a safe distance from the spill/release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any plant drains that are near the location of the spill. ***This should be performed only if it is safe to do so without risking chemical exposure***.

7. The person discovering the spill should attempt to barricade, restrict access, or otherwise mark off safe boundaries around the spill to avert others from inadvertently

approaching the spill area. ***This should be performed only if it is safe to do so without risking chemical exposure.***

8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.

9. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the District Manager or lead Site Technician shall immediately proceed to the spill area to evaluate the severity of the incident. **NOTE: IF ANY PERSONNEL ARE DISCOVERED TO BE UNCONSCIOUS OR OTHERWISE INCAPACITATED UPON APPROACH TO THE SPILL SCENE, ALL PERSONNEL MUST IMMEDIATELY BACK AWAY TO A SAFE DISTANCE FROM THE UNKNOWN THREAT.**

10. The District Manager or lead Site Technician shall evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform). The adequacy or need for PPE should also be assessed. Upon completing this assessment, the District Manager or lead Site Technician shall notify/inform the Facility Emergency Coordinator of the status of the emergency.

    Once the District Manager, lead Site Technician, or Emergency Coordinator, as appropriate, has determined that adequate containment and barricading of the spill area exists, he/she shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill. This observer shall perform radio status checks a minimum of once every three minutes until outside responders arrive for cleanup/mitigation actions.

Threats to the Facility

In the event the site receives threatening correspondence either by phone or by other means of communications, the following actions should be performed immediately:

Actions by the person receiving the threat:

1. Gather as much information as possible from the person making the threat. If the threat is via written correspondence, place the correspondence in a location in which it will not be touched or otherwise disturbed until police can be contacted. If the threat is being made verbally (phone, or other), communicate and obtain information from the individual making the threat for as long as possible.

2. Inform the District Manager or lead Site Technician of the situation.

The District Manager or lead Site Technician may consider any or all the following actions to take in response to the threat situation, depending upon the circumstances of the threat:

1. Order an evacuation of the facility.
2. Call 911 for Police or Fire Assistance.
3. Arrange for additional security personnel for the facility.
4. Direct plant personnel to commence a controlled shutdown of the facility.
5. Direct searches to be performed on vehicles entering the facility.

HURRICANE ANNEX

Per the Texas Department of Emergency Management (TDEM), the BT Cooke facility is not in a TDEM evacuation zone. http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf

Immediate Site Evacuation Procedure

1. Personnel present on-site at the O&M Building shall immediately take the following actions:

    a) Locate and obtain the visitor/contractor sign-in sheet.

    b) Locate and obtain all immediately accessible hand-held radios.

    c) Gather at the front entrance gate at facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Attachment 3).

    ***NOTE:** The primary muster area must be a predetermined location, with any alternate muster areas selected only when egress routes to the primary muster area are unsafe to proceed along.

    d) Pass the following information over the plant radio system:

        1) The muster area the employees will be proceeding to.

        2) Visitors/contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).

    e) Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area. Personnel on-site should not delay in evacuating or wait on other personnel that they anticipate may arrive.

    f) Upon arriving at the designated muster area, the group shall designate a Person- in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.

g) After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for. The Person-in-Charge will then query by radio for personnel who are unaccounted for. The Person-in-Charge shall then establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel who are not accounted for.

h) All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if applicable) to leave the muster location. The "ALL CLEAR" signal will be communicated by radio or cellular telephone.

i) The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.

2. Personnel present in the field/substation area (other than the O&M Building) shall immediately perform the following actions:

a) If not monitoring the plant radio system, immediately turn on hand-held radios.

b) Proceed to the designated muster area unless the egress route to the muster area is not safe for travel. In such a case, proceed to an alternate muster area.

c) Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated muster area.

d) Upon reaching the appropriate muster area, report to the Person-in-Charge and continue to monitor the plant radio system. If no other personnel are present at the muster area upon arrival, communicate to the Plant Lead Technician that no other personnel are present in the area.

3. Personnel not in the operating areas of the plant (to include the O&M building and parking areas) shall immediately perform the following actions:

a) Locate and obtain all immediately accessible hand-held radios.

b) Proceed to the designated muster area.

c) A Person-in-Charge shall be designated for the muster area. In many cases, this will be the Emergency Coordinator. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

d) If the Emergency Coordinator is not present at the muster area, the Person-in-Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives. In the event that the Emergency Coordinator is in plant

operating areas or has proceeded to the alternate muster area, he/she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency

Delayed Site Evacuation Procedures

1. Personnel present on-site at the O&M building shall immediately take the following actions:
   a) Take necessary operating actions to place the facility in the most stable condition, based upon the type of emergency.
   b) Locate and obtain the visitor/contractor sign-in sheet
   c) Communicate names of visitors/contractors currently in the operating areas to outside operating personnel. Instruct outside operating personnel to locate and direct all visitors/contractors to proceed to the Administrative Building for egress instructions.
   d) When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the O&M building, the Plant Lead Technician (or Emergency Coordinator, as appropriate) shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route.
   e) Notify the Emergency Coordinator of the current facility status, and evacuation details.
   f) Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.
   g) Once the shutdown has been completed, all essential personnel shall gather in the O&M and take roll call. When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel. In such a case, proceed to the alternate muster area.
2. Personnel present in the field/substation area (other than the O&M building) shall immediately perform the following actions:
   a) Continuously monitor the radio system for information and instructions.
   b) Perform immediate response actions, as appropriate, to place the facility in the most stable condition, based upon the type of emergency.
   c) Locate and direct non-essential personnel to proceed to the O&M building immediately.
   d) Perform facility shutdown instructions as directed by the Plant Lead Technician.
   e) Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the muster point for instructions.

3. Personnel not in the operating areas of the facility (to include the O&M building and parking areas) shall immediately perform the following actions:

    a) Locate and obtain all immediately accessible hand-held radios. (b) Proceed to the designated muster area (see Site Map).

    b) A Person-in-Charge shall be designated for the muster area. The Person-in- Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the facility.

    c) The Person-in-Charge at the designated muster area will coordinate with outside responding agency activities, and provide assistance (to include personnel, resources, and administrative functions) to the O&M building as directed by the Emergency Coordinator and/or Plant Lead Technician/Lead technician.

4. The Emergency Coordinator shall immediately perform the following actions:

    a) Proceed to the O&M building or to the location on the facility most appropriate for directing response actions for the emergency.

    b) Coordinate actions related to the emergency and provide directions to muster area.

5. Persons-in-Charge

    a) If the emergency escalates in severity or if there is immediate danger to personnel, direct immediate evacuation of all essential operating personnel involved in plant shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

- The Designated Muster Area is the primary gathering point for personnel and should be used during evacuations unless the emergency has rendered egress routes to the Muster Area unsafe for travel.
- The Alternate Muster Area is the alternate gathering point for such circumstances.
- Alternate muster location will be communicated at the time of evacuation and will take into consideration the event occurring that is causing the evacuation

Designated Muster Area	Facility Main Gate (South of site)
Alternate Muster Area	North parking lot/laydown area

RESTORATION OF SERVICE ANNEX

1. Identify any physical damage to generating facility.
2. Electrically isolate generating facility and review the plant's operating logs.
3. Operating personnel to report back to generating facility owner and utility about current status of the facility and timelines to bring facility back online.
4. Operating personnel and generating facility owner to determine whether the facility will need to remain completely offline until fix is completed, or if the generating facility can run at a reduced capacity. These individuals will work with the utility and transmission provider to determine any safety issues that need to be considered.
5. Once a plan is agreed to, the utility and transmission provider will be provided an updated timeline as to when the site will be brought back up to full production capacity.

WEATHER EMERGENCY ANNEX

There are no items distinct from the weather preparations required under §25.55 (winter weather readiness)

- There is no fuel switching equipment.
- There are no updates needed for the checklist used in the winter weather readiness plan.

PANDEMIC AND EPIDEMIC ANNEX

Listed below are the overarching organizational planning assumptions

- Federal, state, and local government will provide guidance and/or direction regarding current pandemic status.
- BT Cooke will evaluate all available information published during a pandemic to determine appropriate response and actions.
- The BT Cooke facility will be accessible, but right of entry may be limited to essential personnel.
- Essential functions, operations, and support requirements will continue to be people dependent. However, human interactions may be remote or virtual, resulting in the employment of appropriate teleworking and other approved social distancing protocols.

- Travel restrictions, such as limitations on mass transit, implemented at the federal, state, tribal, territorial, and local levels may affect the ability of some staff to report to work.
- Additional funding will be budgeted for the acquisition of additional equipment, whether Personal Protective Equipment (PPE) or other equipment identified during an event.

WATER SHORTAGE ANNEX

This is not applicable to the BT Cooke Solar facility, since the generating facility utilizes sunlight as its power source. The facility does not utilize water as a power source.

CYBER SECURITY ANNEX

Access Control

Access is granted based on the principle of least privilege and whether the individual has a business requirement to access the equipment. All access is documented, and security policies are applied prior to entry into cyber infrastructure.

Threat Intrusion

1. Intrusion Identification and Protection:
    a. Determine threat actor intrusion method
    b. Lockdown and isolate all affected systems as necessary
    c. Alert authorized field personnel of possible field deployment
2. Intrusion Detection and Response:
    a. Determine best course of action and possible resolutions based on threat vector
    b. Deploy resolution to all affected devices
    c. Inform field personnel of next steps
    d. Continue monitoring the network for additional intrusions
3. Intrusion Recovery:
    a. Revert any temporary solutions
    b. Determine the extent of damage the intrusion

c. Deploy any final resolution patches

d. Document incident response and implemented solutions

Adapture Renewables, Inc.

BT Cooke Solar, LLC

EMERGENCY OPERATIONS PLAN

Version No. 2

EXECUTIVE SUMMARY

I. INTRODUCTION

BT Cooke Solar, LLC ("BT Cooke") submits this Emergency Operations Plan ("EOP"), which sets forth the common operational functions that are relevant across emergency types and includes annexes that outline BT Cooke's response to specific types of emergencies. The objectives of the plan include procedures, contacts, and measures to ensure an effective response. This EOP is submitted to the Public Utility Commission of Texas ("Commission") and to the Electric Reliability Council of Texas ("ERCOT") in compliance with the requirements of 16 Tex. Admin. Code ("TAC") § 25.53.

II. EMERGENCY CONTACTS

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

1. Primary Contact: REDACTED, COO and General Counsel, Adapture Renewables, Inc., REDACTED
2. Primary Contact: REDACTED, Senior O&M Manager, Adapture Renewables, Inc., REDACTED
3. Backup Contact: REDACTED, Senior O&M Manager, Adapture Renewables, Inc., REDACTED

III. SUMMARY OF CONTENTS AND POLICIES

a. Approval and Implementation (25.53(d)(1)) Pg 3

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

b. Communication Plan (25.53(d)(2)) Pg 6

The communication plan describes the procedures during an emergency for BT Cooke's communication with the media, the Commission, the Office of Public Utility Counsel ("OPUC"), fuel suppliers, local and state governmental entities, officials, and emergency operations centers as appropriate in the circumstances for BT Cooke, and with the applicable reliability coordinator (ERCOT). During an emergency event, BT Cooke has personnel assigned to ensure appropriate communication with related entities.

c. Plan to Maintain Pre-Identified Supplies for Emergency Response (25.53(d)(3) Pg 7

The plan to maintain pre-identified supplies for emergency response includes first aid kit, potable water, battery-powered radio with NOAA weather radio and cold weather gear that is compatible with PPE.

d. Plan to Address Staffing During Emergency Response (25.53(d)(4)) **Pg 9**

The plan to address staffing during emergency response includes DEPCOM's ability to cover every role and responsibility.

e. Plan to Address Identification of Weather-Related Hazards and EOP Activation (25.53(d)(5)) **Pg 9**

The plan to address how BT Cooke identifies weather-related hazards details its processes for identifying tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding. These processes include monitoring weather alerts and contacting personnel to perform necessary procedures. The plan also describes the processes that BT Cooke follows to activate the EOP, which include personnel and site preparedness for the emergency.

f. Annexes (25.53(d)(6)) **Pg 23-33**

BT Cooke submits the following annexes as required by the rule:

1. **Weather Emergency Annex** **Pg 31**

The weather emergency annex includes operational plans for responding to a cold or hot weather emergency that are distinct from the weather preparations required by 16 TAC § 25.55. Those operation plans include no update from the winter weather readiness plan. The annex would include any updates from the winter weather readiness plan.

2. **Water Shortage Annex** **Pg 32**

The water shortage annex addresses supply shortages of water used in the generation of electricity. This is not applicable to the BT Cooke Solar Facility because it is a solar generation facility that does not utilize any water.

3. **Restoration of Service Annex** **Pg 31-32**

The restoration of service annex identifies plans intended to restore service to a generation resource that fails to start or that trips offline due to a hazard or threat. The procedures include identifying damage, electrically isolating, notifying appropriate parties of outage and restoration procedure.

4. **Pandemic and Epidemic Annex** **Pg 31**

The pandemic and epidemic annex describes the processes and procedures that BT Cooke must follow to continue business operations during a health-related emergency including a pandemic or epidemic. These procedures include following the general guidelines and procedures recommended by the CDC and WHO.

5. **Hurricane Annex** **Pg 27-30**

The BT Cooke facility is not located within a hurricane evacuation zone as defined by the Texas Division of Emergency Management ("TDEM"). The procedures include evacuation

although it is not required.

6. **Cyber Security Annex** **Pg 32-33**

The cyber security annex describes the processes and procedures that BT Cooke must follow to minimize, identify, and respond to operational hazards posed by cyber security-related threats. These procedures include access control, identification, protection, detection, response, and recovery.

7. **Physical Security Annex**. **Pg 23- 27**

The physical security annex describes the processes and procedures that BT Cooke must follow to minimize, identify, and respond to operational hazards posed by threats to the physical security of the Entities or employees. These procedures include a fire response plan, chemical spills, and threats to the facility.

IV. RECORD OF DISTRIBUTION

Pursuant to 16 TAC § 25.53(c)(1)(A)(i)(III) and (4)(C), the following table provides the titles and names of persons in each BT Cooke's organization receiving access to and training on the EOP and the dates of access to or training on the EOP:

Individual Name	Title	Date(s) of Distribution, Access, and Training on the EOP
REDACTED	Regional Manager	April 21, 2022
REDACTED	Operating Personnel	April 21, 2022
REDACTED	Senior O&M Manager	April 15, 2022
REDACTED	Senior O&M Manager	April 15, 2022

V. AFFIDAVIT

BT Cooke attaches an affidavit from Thomas J. Houghton, its highest-ranking representative, official, or officer with binding authority over BT Cooke in accordance with 16 TAC 25.53(c)(4)(C).

VI. DRILLS

This section (pages 12-13) of the EOP affirms BT Cooke's commitment to conducting an annual drill each calendar year to test the EOP. This section contains instruction on the notice requirements for conducting annual drills to the Commission and to TDEM District Coordinators as required by 16 TAC § 25.53(f).

AFFIDAVIT

STATE OF TEXAS §
§
COUNTY OF TRAVIS §

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

"1. My name is Thomas J. Houghton. I am over the age of eighteen and am a resident of the State of California I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of BT Cooke Solar, LLC ("BT Cooke").

2 I swear or affirm that in my capacity as Chief Executive Officer and President of Adapture Renewables, Inc. and Authorized Representative of BT Cooke, I have personal knowledge of the facts stated in the Emergency Operations Plan ("EOP") submitted to ERCOT and filed into Project No. 53385. I affirm I am the highest-ranking officer with binding authority over BT Cooke.

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

- Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
- The EOP has been reviewed and approved by the appropriate executives;
- Drills have been conducted to the extent required by subsection (f) of PUC Subst. R. § 25.53 and limited by paragraph 4 below;
- The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- Adapture Renewables, Inc., the ultimate parent company of BT Cooke) maintains a business continuity plan applicable to BT Cooke that addresses returning to normal operations after disruptions caused by an incident; and
- BT Cooke's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training.

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

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

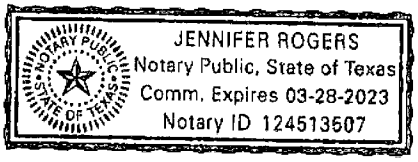
Further affiant sayeth not.

Thomas J. Houghton

04/18/2022
10:39 AM CDT

Thomas J. Houghton
Chief Executive Officer and President of
Adapture Renewables, Inc. and
Authorized Representative of
BT COOKE SOLAR, LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 18th day of April 2022.



Online Notary Public. This notarial act involved the use of online audio/video communication technology.

Jennifer B. Rogers

04/18/2022
10:40 AM CDT

Notary Public in and for the
State of Texas

My Commission Expires: March 28, 2023