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Section 1, Applicable Entities & Introduction

PROENERGY Holding Company Inc., and its subsidiaries referenced in the below chart (collectively referred to as "PROENERGY"), established the Electric Service Emergency Operations Plan (EOP/Plan) to address power plant operations and response during Emergency Events.

Entity and Facility Name(s)
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

References

16 TAC § 25.53, Electric Service Emergency Operations Plans

Section 2, Approval and Implementation

- This Plan outlines tasks performed at the applicable generation resources to prepare for and implement emergency operations events as defined by the Public Utility Commission of Texas (PUCT) under 16 TAC § 25.53, Electric Service Emergency Operations Plans specific to Power Generation Companies (PGC).
- This Plan and all of its sections, including the Annexes, are applicable to all entities as listed in Section 1.
- The facilities exclusively operate on natural gas. Therefore, a plan related to an alternate fuel under 16 TAC § 25.53(e)(2)(A)(ii) is not applicable.
- As of March 14, 2025, this EOP was approved by PROENERGY and supersedes any previous version of the EOP.
- The following table lists the individuals who, as of March 14, 2025, can revise and implement the EOP.

f. Revision Control

Version Number	Effective Date	Summary of Changes
8	March 14, 2025	Updated personnel and employee titles referenced within the Plan
7	March 14, 2024	Updated personnel and employee titles referenced within the Plan
6	October 1, 2023	Updated personnel referenced within the Plan
5	March 14, 2023	Updated roles and responsibilities based on personnel changes and the definition of hot weather event to align with new Summer Operations Plan
4	February 21, 2023	[REDACTED]
3	January 6, 2023	[REDACTED]
2	April 13, 2022	Added Annexes and the additional information required by 16 TAC § 25.53
1	September 21, 2020	Initial document

Section 3, Responsibilities

a. Section 3 describes the roles required for implementing the EOP.

i. **Director of Reliability Compliance** is responsible for:

- (1) Ensuring contact information is kept up to date and communicated to appropriate personnel.
- (2) Reviewing this Plan and associated materials on an annual basis and submitting the required filings under 16 TAC § 25.53.

ii. **Plant Superintendent(s)** are responsible for:

- (1) Activating the Emergency Operations Plan and serving as a coordinator to any emergency response.
- (2) Ensuring:
 - (a) adequate resources for the implementation and ongoing management of this Plan.
 - (b) Drill(s) are preformed, and lessons learned are applied.

iii. **O&M Supervisor(s)** are responsible for:

- (1) Communicating with Employees, at a minimum at the beginning and end of each shift, regarding activities to be undertaken during the Emergency Event.
- (2) Serving as a coordinator to any emergency response.

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- iv. **Employees** are responsible for:

- (1) Complying with all requirements as defined in this Plan.

Section 4, Definitions

- a. **Emergency Event** is a situation in which the known potential consequences of a Hazard or Threat are imminent and severe such that prompt action will be taken to prepare for and reduce the harm that may result from the hazard or threat. This term could include emergencies declared by local, state, federal authorities as well as ERCOT and other regulating entities.
- b. **Critical Failure Point** is a piece of equipment that upon its failure to operate would cause a unit to be locked-out from a startup or trip during operation during an Emergency Event.
- c. **Hazard** is a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
- d. **Hot Weather Event** is when the ambient air temperature is expected to be above 110°F for four consecutive hours.
- e. **Hurricane Watch** is when conditions are possible for a hurricane to strike the surrounding area and issued approximately 48 hours prior to anticipated tropical-storm-force winds.
- f. **Hurricane Warning** is when conditions are expected for a hurricane to strike the surrounding area and issued approximately 36 hours prior to anticipated tropical-storm-force winds.
- g. **Flood Event** is a rain event that causes a significant amount of standing water on the property that has the potential to impair operation. For this plan, the cause of a Flood Event can include but is not limited to a Hurricane Event.
- h. **Cold Weather Event** is when the ambient air temperature drops below 32° F for more than four consecutive hours.
- i. **Threat** is the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.
- j. **Tornado Watch** is when conditions are possible to create a Tornado in and near the watch area.
- k. **Tornado Warning** is when a Tornado has been sighted in the area or indicated by weather radar.

Section 5, Emergency Operations Events

- a. Emergency Plans
 - i. Emergency plans are developed and maintained for the following scenarios:
 - 1. Weather Emergency Events

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2. Water Shortages
 3. Restoration of Service
 4. Pandemic and Epidemics
 5. Hurricane and/or Tornado Events
 6. Cyber Security Events
 7. Physical Security Events
- ii. Each emergency plan is reviewed and revised as needed, however an annual review is conducted.
 - iii. Seasonal weather-related plans should be reviewed within one month of the season ending (i.e., April for cold weather events and October for warm weather events).
- b. Emergency Identification and Plan Activation
- i. Forecasted weather related events are reviewed and planned for during the daily call with operations personnel.
 - ii. For all other non-weather-related events, the Plant Superintendent(s) determine when activation of the Emergency Operating Plan is required.
 - iii. The Plant Superintendent coordinates resources to respond to an Emergency Event based on the emergency type.
- c. Staffing
- i. The generating facilities are remotely operated by Control Room Operators (CRO) from the PROENERGY Services Remote Operating Centers (ROC) and locally maintained by Operation & Maintenance Technicians (OMT).
 - ii. The ROC is staffed 24/7 and has camera view of the facilities.
 - iii. The OMTs are scheduled to the facilities as needed to perform normal preventative and corrective action maintenance activities including the execution of the duties of this Plan.
 - iv. Management shall dispatch OMTs to the facility if necessary to carry out the requirements of this program to prepare for, assess, and resolve Emergency Event operations as summarized in this Plan.
 - v. During Emergency Events that require additional staffing, arrangements will be made for additional coverage of the facilities, including around the clock staffing during the event. Arrangement for lodging at or near the facilities will be made, as appropriate.
- d. Facility Communications
- i. If there is advance notice, the Plant Superintendent(s) is to review and ensure appropriate communication protocols are followed throughout the Emergency Event.
 - ii. The Plant Superintendent(s) identifies, as appropriate, back-up communication options in case the primary system is not working.
 - iii. The Plant Superintendent(s) reviews special operating instructions with the ROC as needed. O&M Supervisor(s) maintain routine communications with the ROC throughout the event.

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- iv. O&M Supervisor(s) review pertinent emergency activities at the beginning of each shift and during shift turnover to keep all personnel alerted to changes in the event status and ensure responsibilities are known during the event.
 - e. Critical Failure Points
 - i. Each facility conducts reviews of equipment and components that are deemed critical to operation during an Emergency Event.
 - ii. Plans to mitigate failure of critical equipment and components are implemented, to the greatest extent possible, per the specific emergency type.
 - iii. Each critical failure point is protected prior to a weather-related emergency as defined by the specific emergency plan.
 - iv. Each critical failure point is included as part of a routine checklist to be monitored by OMT personnel throughout the duration of an Emergency Event.
 - f. Emergency Event Supplies
 - i. Each emergency scenario will call out specific supplies and equipment needed to prepare for and recover from emergency events.
 - ii. Supplies and equipment are maintained at the facilities and/or the Texas office.
 - iii. Supplies and equipment are inspected and replenished. In the case of weather-related emergency equipment, this will take place at least one month prior to the weather season.

Section 6, Emergency Operation Drills & Training

- a. On an annual basis the facility shall perform and document a drill to test the employees' knowledge and the plan's effectiveness of the Emergency Operations Event as defined in this plan. Results of the drills shall be discussed with the employees and necessary stakeholders and updates implemented as necessary.
- b. Employees shall be trained on the requirements of this Plan upon:
 - i. Initial employee orientation.
 - ii. As needed, determined by the Plant Superintendent.
 - iii. During the annual drills as discussed in this section.

Section 7, Plan Review, Contacts and Filings

- a. The Director of Reliability Compliance or designee shall review this Plan with its specific emergency operations events on an annual basis (may be completed during a drill event).
- b. The Director of Reliability Compliance or designee shall provide the PUCT with updates to emergency contact information within 30 days of a change.

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- c. When a material change is made to the EOP in the previous calendar year, the Director of Reliability Compliance or designee shall file an updated plan with the PUCT by March 15.
 - d. When no material changes are made to the EOP in the previous calendar year, CEO or President shall provide sworn attestation of the same to the PUCT by March 15.

Section 8, Annexes

Weather Emergency

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Purpose

This procedure outlines a summary of existing procedures for severe cold or hot weather. PROENERGY is committed to adequate staffing and remaining in operations through all extreme cold and hot weather events. The Company developed guidelines to protect employees, while ensuring continual operation of the facility.

Cold Weather Events

The PROENERGY sites are subject to below-freezing temperatures.¹ Annual preparations are made to prior to winter season to protect cold weather critical components from freezing. These preparations include, but are not limited to, installing and maintaining freeze protection/insulation, temporary shelters, heat tracing (if applicable), and placing of portable heaters.

When the Plant Superintendent determines staffing could be restricted by severe weather road conditions, employees will be asked to stay on-site or in nearby lodging. The Company will provide for the cost of meals and lodging during an emergency event.

Cold Weather Preparation and Event Checklist

In preparation for the winter season and the possibility of a cold weather event, critical components are protected. The Company maintains a cold weather critical component list with the required protection. In addition, the below checklist is used for monthly inspections and winter weather events.

¹ The Company maintains a separate Cold Weather Operations Plan and this annex summarizes that Plan. Refer to PES-OPS-001 and PES-EOP-011-2.

In preparation for the winter season and the possibility of a winter weather event the following maintenance tasks are to be completed and components repaired or replaced on a monthly basis, prior to a winter weather event, and as needed. This checklist may also be completed in PROENERGY's centralized maintenance management system.

For the following equipment, confirm cold weather protection equipment is installed and is in good working order, functional, or properly installed:

I have verified that the activities above are complete and confirm the facility is prepared for the Winter Season and Cold Weather Events.

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Hot Events and Checklist

PROENERGY sites are subject to temperatures at or above 110°F.² To prepare for the summer season and the possibility of a hot weather event, the below checklist is utilized before a hot weather event and on a monthly basis.

Task	Associated CA or PM# if Applicable	Date Completed
Review previous summer event issues. Ensure lessons learned have been implemented.		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		

²The Company maintains a separate Summer Weather Operations Plan and this annex summarizes that Plan. Refer to PES-OPS-002.

Water Shortage – Mitigation Measures

EMERGENCY SHORTAGE OF WATER

PROENERGY units are [REDACTED]

[REDACTED] For operations, the sites use city water service, water from a contracted supplier, such as the Gulf Coast Water Authority, or groundwater.

If a site uses groundwater, two on-site wells, a primary well and secondary well, provide the water for the facility. Operation of only the primary well is sufficient to meet the water needs of the facility. The secondary well can be used if there is an issue with the primary well. The secondary well can meet operational needs for a short period of time while any issue with the primary well is addressed.

If the wells do not supply sufficient water, or if city or contracted service is curtailed in emergency situations, the facility shall either:

- Derate the units as appropriate;
- Operate, to the extent possible, under enforcement discretion from applicable regulatory agencies; or
- Procure another source of water, such as tankers, and derate as appropriate (if feasible).

Restoration of Service

Each site maintains its own Plant Isolation and Restoration Procedures. The very high-level steps for restoration of service are: (1) ensure the site is isolated from the grid, by removing several plant components from service, then (2) restore electrical back feed to the site.

Pandemic and Epidemic Response Plan

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Overview

This Plan focuses on the response to a pandemic or epidemic outbreak. A pandemic or epidemic outbreak is a different disaster that does not involve damage to physical property. Instead, the impact of a pandemic outbreak is focused on managing exposure risk and potential high absentee rates. In an extreme situation, a pandemic outbreak could also involve the loss of critical services.

Typical planning for a business focuses on site-specific or area-specific natural and man-made threats – earthquakes, fires, hurricanes, tornadoes, etc. Much of this planning is still applicable for pandemic outbreak planning. Additional planning needs to be made in the following areas:

- Social distancing policies
- Personal hygiene practices
- Personal protective equipment
- Employee, contractor and manager responsibilities
- Special time-off and compensation policies

Social distancing policies, personal hygiene practices, employee, contractor and manager responsibilities and personal protective equipment are designed to reduce the possibility of contracting a virus during a pandemic. Special time-off policies may be necessary for employees who either cannot work or who are not allowed to work for an extended period.

Scope

This Plan is an organizational-level plan that guides the emergency response of personnel and resources during a pandemic or epidemic outbreak.

This Plan shall be subordinate to federal, state, or local plans and/or regulations during a disaster declaration by those authorities. This Plan is consistent with established practices relating to coordination of emergency response. The Company will cooperate with the Office of Emergency Management, Police, Health, Fire and other responders.

Company resources and equipment will be utilized to accomplish the following priorities:

- Priority I: Protection of Human Life
- Priority II: Protection of Business Assets
- Priority III: Maintenance or Rapid Restoration of Critical Business Operations
- Priority IV: Assessment of Damages
- Priority V: Restoration of General Business Operations

Limitations

This Plan is designed to be a supporting plan component of the overall Business Continuity Management Program. Therefore, this Plan by itself will not provide adequate planning for other types of emergencies. In addition, this Plan will be only partially effective under the following circumstances:

- The disaster causes an extreme loss of life
- The disaster causes a complete breakdown of law and order and/or other essential community infrastructure services
- A disaster that causes a complete regional breakdown of communication services

Key Decision Factors**Actions Levels**

Fundamentally the response to a pandemic outbreak can be broadly classified as follows:

- Level 1 – Monitor and Prepare
- Level 2 – Full Activation – Business Remains Open
- Level 3 – Full Activation – Business Sites Close

Key Factors

The primary factors involved in determining a course of action are the severity of the outbreak, the availability of an effective vaccine, and the location(s) of the outbreak. The severity of the outbreak is determined by the contagiousness and mortality rate associated with the virus. The location can be sub-classified as either overseas, within North America, or within the immediate area.

Response

If the mortality rate is not high, the business should consider executing Level 2 actions – remaining open and implementing social distancing, employee, contractor, and manager responsibilities plus personal protection equipment policies as needed. If the outbreak is not in the immediate area, there may be some time to develop an effective vaccine before the virus reaches the immediate area.

Depending on the location(s) of the outbreak, social distancing policies would likely be gradually introduced. If the outbreak is not in the immediate area, certain travel and visitor restrictions would likely be effective immediately. If the outbreak is in the immediate area, full social distancing and personal protection equipment policies would become effective.

If the mortality rate is high, the business should consider executing Level 3 actions – closing the office facilities and work from home or other safe remote locations. Develop a schedule for

essential personnel to ensure adequate staffing at site to maintain equipment. Additionally, a contingency of essential personnel may also have to remain on site to provide security and, if applicable, to maintain controls for sensitive materials.

Plan Execution

LEVEL 1: Monitor and Prepare

Initial actions are taken when a contagious outbreak occurs within North America. If the contagious outbreak does not appear to be contained or if there is a chance the outbreak will spread to the immediate area, then Level 2 activation should be taken.

- Activate or maintain an Emergency Operations team comprised of department managers, or their designee.
 - Designate a spokesperson for internal and external communication
 - Closely monitor the location(s) and mortality rate of the outbreak
 - Closely monitor absentee rates
 - Daily meetings should be held by the team
- Track vaccination programs
- Assist employees with access to vaccination programs
- Implement travel and business facility access restriction policies
- Be prepared to implement social distancing and personal protection equipment policies

LEVEL 2: Full Activation – Business Remains Open

The outbreak is now in the immediate area, and a decision for the primary business facilities to remain open has been made.

- Activate or maintain the Emergency Operations team
 - Designate a spokesperson for internal and external communication
 - Closely monitor the location(s) and mortality rate of the outbreak
 - Closely monitor absentee rates
 - Daily meetings should be held by the team
- Track vaccination programs
- Assist employees with access to vaccination programs
- Implement travel and business facility access restriction policies
- Restrict travel to any affected areas
- Consider eliminating all travel
- Do not allow access to anyone who has traveled to an infected area
- If possible, do not allow any guests or visitors

- If possible, allow employees to work from home
- Consider activating alternate sites
- Consider working from other safe locations
- Limit, but preferably eliminate, all type of face-to-face (within 6 feet or less) contact
- Avoid meetings, shared offices, handshaking, etc.
- Limit, but preferably eliminate, all face-to-face (within 6 feet or less) talking
- Utilize speakerphones, and avoid any face contact with communication equipment
- Disallow smoking breaks
- Cancel any social gathering/events
- Allow employees to eat lunch alone at their workstations
- Businesses with work shifts should consider leaving an interval of inactivity between shifts
- Any employee with symptoms
 - If at work, should be sent home or, if available, to medical facilities, wearing a face mask
 - If at home, should not report to work
 - Will need to follow current local Government/County, CDC guidance on isolation
 - Can only return to work when they are symptom free after the recommended number of days issued by the CDC
 - Ideally, once the individual returns, follow government masking recommendations for following the isolation period
- Maintain contact with employees at home
 - Preferably by phone, website and e-mail
 - Avoid personal contact
- Require everyone to wear appropriate Personal Protective Equipment
- It may be necessary to suspend meetings
- Maintain employee, client, customer, etc. contact
 - By phone, website and e-mail
 - Avoid personal contact

LEVEL 3: Full Activation – Business Sites Close

- Maintain mission-critical production and services capabilities:
 - Work from home
 - Work from other safe business locations

- Work from vendor sponsored alternate sites
- For all employees that must continue working together, implement all appropriate precautions in LEVEL 2

In Advance of an Outbreak

- Have sufficient nonperishable food, water, medications and other survival supplies available for as long a period as reasonably possible
- In particular, maintain an adequate supply of
 - Soap for frequent hand washing. Recommend that hand sanitizer be available as well.
 - Face masks, latex gloves, tissue, etc.
 - Antiviral medications
- Do not travel to any areas where an outbreak is occurring

If an epidemic or pandemic outbreak occurs in the immediate area:

- Try to avoid contamination by taking the following general precautions:
 - Avoid public transportation
 - Eliminate all unnecessary travel
 - Eliminate shopping, entertainment, etc.
 - Do not allow guests or visitors
- Try to avoid contamination by taking the following medical precautions:
 - Wash hands frequently with soap and water. Utilize hand sanitizer if soap and water are not immediately available.
 - Wash sheets and clothes in hot water
 - Do not touch your face with your hands (eyes, nose and mouth are the most likely points of virus entry into the body)
 - Coughs and sneezes:
 - Into tissue and dispose of tissue
 - Into your elbow
 - Wear face masks, eye goggles and other personal protection equipment
 - Dispose of all used face masks, tissue, etc., and afterwards wash hands
 - Stop smoking
 - Stay away from others as much as possible, in particular:
 - People with symptoms
 - Children
 - Chronically ill people

- If infected
 - Do not report to work
 - Follow current local Government/County, CDC guidance on isolation (which is currently 5 days).
 - Return to work when symptom free after the five days
 - Follow government masking recommendations after the isolation period but not required

Hurricane Incident Response

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Severe Storms & Hurricanes

PROENERGY's sites are subject to severe storm fronts, flooding, tornados, and hurricanes.¹ Some changes in the weather associated with severe conditions may provide little or no warning. In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

The Remote Operations Center Superintendent(s) track and will coordinate with the Director of O&M and General Manager in an event a hurricane will make landfall. The Plant Superintendent will make every effort to be onsite to determine appropriate action. If the Plant Superintendent cannot be contacted or is unable to be onsite, the O&M supervisor shall serve as an alternate. In the absence of site supervision, the Remote Operations Center Superintendent shall determine the appropriate action using his judgment with personnel safety and equipment preservation being priority followed by environmental protection until a member of the O&M team arrives at the facility.

¹ Pursuant to the Texas Division of Emergency Management all PROENERGY sites are located within TDEM's hurricane evacuation zones except the Braes Bayou Plant.

During severe weather, caution will be used during outside activities. If severe conditions are in the immediate area of the plant, outside activities will be curtailed as much as possible. Personnel shall avoid being on the highest elevation on any structure. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

Purpose

This procedure establishes the policy for actions during periods of a potential hurricane or active hurricane. PROENERGY is committed to being adequately staffed and operational during all weather conditions if deemed safe by management.

Responsibility

The Director of O&M or Remote Operations Superintendent(s) will establish a Hurricane Watch whenever a hurricane enters the Gulf of Mexico. The Director of O&M, in conjunction with the Remote Operations Superintendent(s), will be responsible for maintaining the Hurricane Watch by tracking a hurricane or storm and its location and strength.

When a hurricane enters the Gulf of Mexico, the following personnel at a minimum will report for a called meeting via conference call:

- Director of O&M or the General Manager
- Plant Superintendent(s)
- Remote Operations Superintendent(s)
- WattBridge Asset Management

Communications

The Director of O&M/General Manager or the Remote Operations Superintendent(s) will alert facility employees and Remote Operations Center operators as to when the Hurricane Procedure will be initiated. Daily meetings will be held via conference call. The Remote Operations Center dispatch number will be used throughout this process to communicate between onsite personnel and the Remote Operations Center in Sedalia, MO or Houston, TX. Onsite personnel may use landline, cell phone, and/or satellite to communicate with the Remote Operations Center operators and Remote Operations Center Superintendent.

Hurricane Crew

The hurricane crew (before and after hurricane landfall) will be kept to a minimum (if evacuation does not occur). The Hurricane Crew is responsible for site preparations prior to landfall of the storm and site restoration after the storm passes the facility/leaves the area.

Communication with Evacuated Employees

Employees will be contacted by their Plant Superintendent or O&M Supervisor as soon as the storm passes the facility to receive instructions on when to return to work.

General Hurricane Season Guidelines (June 1 – November 30)

- Plant-specific operations information and pre-storm activities will be reviewed prior to June 1st.
- Management will meet as needed throughout the hurricane season to evaluate preparedness, policies, and procedures, and to make recommendations for

improvement. Operations and Maintenance personnel should meet at the beginning of each hurricane season (in June) to review this procedure to discuss possible shutdown and electrical de-energization procedures.

Phase 0 – June Preparations

In June of each year the Plant Superintendents will review Hurricane Preparedness with their respective teams. An annual review of this procedure should take place at this meeting. Any proposed changes should be discussed at this time.

- The waste oil in the oily water separators should be disposed of prior to a hurricane to prevent overflow in the event of heavy rains. Typically, during the summer season, the separators are emptied weekly. If applicable, test portable generators and move to offsite storage.
- Contact local authorities for the latest local evacuation route maps for distribution to employees.

Phase 1 – Storm Watch Initiated

Based on available information concerning the size, intensity, rate and direction of travel of the disturbance, Phase I of the Hurricane Procedure should be activated as soon as the storm enters the Gulf of Mexico, but not less than 96 hours prior to the projected landfall. Phase I should be completed no less than 72 hours prior to the arrival of gale force winds (55 mph). Phase I includes daily meetings, taking inventory of supplies, and testing equipment.

Verify required supplies are in stock and that all equipment which is not under planned or unplanned maintenance is operable. Establish a plan for work requirements to prepare for entering Phase II.

If deemed necessary, The Director of O&M/General Manager, with WattBridge Asset Management acting as back-up, shall contact the Qualified Scheduling Entity to discuss timing and preparations for shutting down the facility and evacuation of the site. Initiation of the shutdown will be scheduled by the Director of O&M accordingly. The timing for the evacuation of the site will be determined by the Director of O&M/General Manager, but should be no later than the time that an evacuation order for the site location area is issued by Emergency Management Officials.

A central communications contact person/phone number will be established for employees to call following evacuation. This person will typically be the O&M Supervisor for the site. All employees will be given contact information prior to evacuation. Complete the below tasks:

- The demin tanks at the facility should be filled prior to the event.
- Provisions shall be made for the securing of all doors and other openings prior to the start of the hurricane event.
- All planned visitors should be contacted, and their visits postponed.
- Any personnel not at the site need to be notified and placed on alert.
- All supplies inventoried and equipment checked.
- If present, check diesel fuel supplies (specifically in/for generators).

Phase II – Site Preparation for Hurricane Conditions

Phase II should be started not less than 72 hours in advance of the anticipated arrival of gale force winds (55 mph) and completed 36 hours prior to the arrival of gale force winds.

Phase II includes the preparation of the facility to meet hurricane conditions and the purchasing, collection, and organization of all equipment and supplies. Any state or local hurricane preparedness briefings should be attended by the Director of O&M/General Manager and a WattBridge Asset Management representative.

A daily conference call will be held between onsite personnel and the Remote Operations Center to discuss the status of preparations, location of the hurricane, expected arrival date, and anticipated location of landfall. O&M site personnel completes the following tasks:

- Secure any loose objects
- Update important backup records, catalog, and store all records that will be evacuated from the plant.

The Director of O&M/General Manager may designate employees to bring certain information with them to keep secure during evacuation.

Phase III – Shutdown Remaining Equipment

Phase III should be started not less than 24 hours prior to the anticipated arrival of the storm and should be completed within that 24-hour period.

- If evacuating area, and it is decided to take the plant offline, perform the site-specific "Remove from Service" procedure.
- Secure the plant, ensure any applicable checklists are complete.

Phase IV – Restoration

Following the hurricane, once authorization to return to the area has been received from Local Emergency Management, all essential personnel, as designated by the Director of O&M/General Manager, shall return to the site to assess damages.

Once damages are assessed, WattBridge Asset Management and the Remote Operations Center shall be contacted and briefed. All employees on site will meet to discuss damages and to prioritize tasks to be completed to restore the site.

The O&M Supervisor will be responsible for keeping an accurate report of all damage and repairs made, photographs shall be taken to document all damage incurred by the facility. If damage occurs to the sites, notify Director of Risk.

If evacuated and site was removed from service before the main electrical switch is closed, the site O&M Technicians should inspect the electrical system to detect and repair damage and obtain the approval of the Plant Superintendent.

Building damage inspection shall be completed before entry is allowed.

[REDACTED]

- o CIP Senior Manager (**4 hours**)
- o ERCOT (**24 hours**)
- o NERC (**24 hours**)
- o E-ISAC (**24 hours**)
- o NCCIC (**24 hours**)
- o The Change Advisory Board (CAB@proenergyservices.com) and senior leadership (**72 hours**) by including the below information
 - Full findings report conveying information about the exposure with appropriate level of detail and initial timeline

. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

¹ This response outline assumes there was a cyber security breach

- [REDACTED]
- [REDACTED]
- [REDACTED]
- ERCOT
 - E-ISAC
 - NCCIC
 - DOE
 - Local Law Enforcement

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

i

[illegible]

1. [REDACTED]

▪ [REDACTED]

External Communications (if applicable)

- NERC
- ERCOT
- E-ISAC
- NCCIC
- DOE
- Local Law Enforcement

PROENERGY
Crisis Communications Plan

Purpose

The PROENERGY Crisis Communications Plan ("Plan") ensures that PROENERGY leadership effectively communicates a response to an emergency disruption. In so doing, the Company will be able to continue or immediately resume critical business functions. For the purposes of this Plan, critical business functions are those that support the PROENERGY mission, comply with legal requirements, and support safety and well-being under all circumstances. This includes natural, technological, and man-made incidents that result in loss of access to parts of, or an entire facility, or loss of service due to equipment or systems failure.

The benefit of this Plan includes the ability to anticipate response actions, identify spokespersons, identify key stakeholders, and ensure a timely recovery to normal operations.

Objectives

The primary objective of the Plan is to provide a framework and means to clearly communicate factual information that comprises the PROENERGY response to an emergency situation. Additional objectives of the Plan are to:

- Identify authorized company spokespersons
- Anticipate response actions and communications
- Identify key stakeholders
- Communicate a timely recovery to normal operations
- Provide support and guidance to employees during an event
- Identify alternative courses of action to minimize and mitigate the effects of the crisis in a shortened timeframe

Authorized Spokespersons

In the event of any critical situation (digital or physical) that impacts key business operations, the following list of employees are solely authorized to speak on behalf of PROENERGY. These employees must first consult with Jeff Canon, PROENERGY CEO, prior to making public comments.

Name	Email	Number
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Plan Assumptions

The following assumptions were used while creating this Plan:

- An event has occurred that affects normal business operations

- There is limited or no access to the affected facility
- Documents and equipment within the facility are inaccessible
- Qualified personnel are available to continue operations

The following Levels of severity were used to comprise this Plan

- **Level 3**—A disruption in service may have occurred—resulting in no life-changing or life-ending injuries—that is fully contained inside the PROENERGY facility or property to include:
 - Small fire contained by on site personnel
 - Hazardous material release less than reportable quantities, posing no safety or health threat
 - Flammable gas or liquid release with no ignition
 - Non-hazardous odor releases onsite
 - Medical emergency or accident requiring transport offsite
 - Severe weather condition (cold weather event, tornado, hurricane, severe winds, etc.) predicted for the site within 12 hours
- **Level 2**—A disruption in service has occurred—resulting in no life-changing or life-ending injuries—that is limited to the PROENERGY facility, but has the potential for damage or health concerns outside the PROENERGY facility or property to include:
 - Fire that requires outside assistance
 - Hazardous material release that exceeds reportable quantities, posing minor safety or health threats contained within the PROENERGY site
 - Flammable gas or liquid release that exceeds reportable quantities, or with potential for ignition on the PROENERGY site only
 - Hazardous material fire with fumes and minor damage contained within the PROENERGY site by onsite personnel
 - Medical emergency or accident involving multiple injuries—none life changing or life ending—requiring transport offsite
 - Severe weather condition has caused damage to site that cannot be repaired within 12 hours, to include flooding or other storm damage.
- **Level 1**—A disruption in service has occurred—that may have resulted in a life-changing or life-ending injuries—that poses significant damage or risk to the PROENERGY facility or property and beyond.
 - Fire that requires outside assistance that is likely to spread beyond original ignition area
 - Hazardous material release that exceeds reportable quantities, posing a material health risk to PROENERGY employees and nearby stakeholders
 - Flammable gas or liquid release that exceeds reportable quantities and is likely to spread beyond the PROENERGY site
 - Hazardous material fire with fumes and damage that pose a material health risk to PROENERGY employees and nearby stakeholders
 - Medical emergency or accident involving a life-changing or fatal injury to one or more persons
 - Severe weather condition has caused damage to site that cannot be repaired within 48 hours, to include flooding or other storm damage.

- Security alert to include situation such as bomb threat, civil disturbance, hostages, or unauthorized personnel onsite

Response Actions and Communications

As a responsible corporate citizen, PROENERGY must respond promptly, accurately and confidently during an emergency in the hours and days that follow. Many different audiences must be reached with information specific to their interests and needs. The image of the business can be positively or negatively impacted by public perceptions of the handling of the incident.

When an emergency occurs, the need to communicate is immediate. If business operations are disrupted, customers will want to know how they will be impacted. Regulators may need to be notified and local government officials will want to know what is going on in their community. Employees and their families will be concerned and want information. Neighbors living near the facility may need information—especially if they are threatened by the incident. All of these “audiences” will want information before the business has a chance to begin communicating.

Audiences and Stakeholders

There are many potential audiences that will want information during and following an incident and each has its own needs for information. Below are key stakeholders for some or all PROENERGY facilities and properties.

- PROENERGY employees and their families
 - [Redacted]
- Customers - AeroAdvantage
 - [Redacted]
- Customers - PowerFLX
 - [Redacted]
- Suppliers
 - [Redacted]
- PROENERGY investors
 - [Redacted]
- Regulatory bodies
- Community—nearby neighbors and/or businesses
- Government elected officials at the city, county, and state levels
- Media

Communications Matrix

In the event of any critical situation (digital or physical) an authorized spokesperson may use the following guidelines to speak on behalf of PROENERGY. The authorized spokesperson must first consult with PROENERGY CEO, prior to making public comments.

	Level 3	Level 2	Level 1
Employees	Universal and Preventive: Drive employee awareness, file incident report, and communicate root cause / lessons learned	Universal and Preventive: Drive employee awareness, file incident report, and communicate root cause / lessons learned	Universal and Preventive: Drive employee awareness, file incident report, and communicate root cause / lessons learned
Employee Families	Limited: Make direct contact with family member impacted by the incident and/or transported to a medical facility.	Limited: Make direct contact with family member impacted by the incident and/or transported to a medical facility.	Limited: Make direct contact with family member impacted by the incident and/or transported to a medical facility.
Customers	Limited: Determined per event impact and location; incidents at a client site must be reported immediately and coordinated through the Customer audience manager and the CEO	Limited: Determined per event impact and location; incidents at a client site must be reported immediately and coordinated through the Customer audience manager and the CEO	Proactive: Issue statement that identifies the issue, it's root cause, and actions taken to eliminate risk outside the PROENERGY site of property
Investors	Limited: Determined per event by the CEO and investor audience manager	Limited: Determined per event by the CEO and investor audience manager	Coordinated: Direct and ongoing event updates as determined by the CEO and investor audience manager
Community	None	None	Proactive: Issue statement that identifies the issue, the risk to the community, it's root cause, and actions taken to eliminate risk outside the PROENERGY site of property.
Government	None	Preventive: Issue statement that identifies the issue, it's root cause, and actions taken that have eliminated risk outside the PROENERGY site of property.	Coordinated: Build a collaborative working relationship with the relevant emergency managers at the city, county, and state levels as required per the incident.
Regulatory agencies	Limited or Preventive: the Real-Time Operating Center (ROC) will contact the energy manager (such as Tenaska) for requests—such as equipment support for a pending storm—or as required per the outage. The	Coordinated: the ROC will contact the energy manager to maintain a regular communications schedule from the initiation of the brief outage to its close.	Coordinated: the ROC will contact the energy manager will maintain a regular communications schedule from the initiation of the major outage or event to its close.

	energy manager will communicate with the reliability coordinator.		
Media	None	Limited: Prepared response if approached. A brief statement can be considered for social media and will be case dependent.	Proactive: Prepare and release clear and factual statements immediately. Have spokesperson at or near the site for transparency. An ongoing plan and cadence will be case dependent.

Critical Business Processes

The following are primary business processes within PROENERGY:

1. Remote operation and control of power plants
2. Manufacturing of components and assemblies surrounding power plants
3. Service of external customer power plants
4. Building and development of power plants
5. Site operation and maintenance of power plants

Office and Generating Station Locations

PROENERGY has several office locations (Sedalia, Missouri and Houston, Texas). PROENERGY owns and operates six generating stations in the greater Houston area.

Name	Address	City/State/Zip	Phone
Corporate Office	2001 ProEnergy Boulevard	Sedalia, Missouri 65301	660-829-5100
Houston Office	6246 McHard Road	Houston, Texas 77053	660-829-5100

Approval and Authority

Chief Compliance Officer is responsible for approving the plan and for conducting an annual review to ensure its relevance and continuity. PROENERGY will review this plan annually to modify it for any changes in our operations, structure, business, or location. PROENERGY will also update this plan as dictated by non-annual material changes to our operations, structure, business, or location.

Plan Location and Access

Our company will maintain copies of its business continuity plan and annual review changes on the company intranet page in the quality library. Physical copies maintained by personnel are to be reviewed and updated yearly and can be accessed in the front office of each location.

Business Description

Based in Sedalia, Missouri, PROENERGY is a global peak-power solutions provider with operational experience on every continent. The company offers vertically integrated aeroderivative power services, including engineering, construction, operations, repair, maintenance, research, and true, turnkey peak-power facilities that include the complete balance of plant. For more on PROENERGY, visit www.proenergyservices.com.