personnel such as the information officer and agency representatives. For large incidents, these representatives should relay any pertinent information gathered from the meeting on to their personnel.

Debriefings should be conducted in buildings or vehicles away from distractions and should be:

- Conducted by one person acting as Chairperson.
- Limited to under one hour (preferably 45 minutes) with the intent to briefly review the incident and not over-analyze every action. If more attention is needed for a specific subject, that interaction can continue at a later time.

The subjects to be covered in a debriefing should include:

- Health Information: The responders should be provided information (possibly by the Safety Officer) for each of the potential signs and symptoms of the exposure to all the substances involved in the incident. Any exposure levels for individuals should be logged and plans for any follow-up evaluations, such as medical testing, should be covered.
- 2. <u>Equipment Exposure Review</u>: Ensure that any unsafe or damaged response equipment is clearly marked or otherwise identified and plans are made for any special cleaning or disposal. An individual should be assigned that specific responsibility of decontaminating equipment and/or disposal of unfit equipment.
- 3. <u>Provide a Follow-Up Contact Person</u>: Provide a single contact person as a point for communication with all persons involved with the incident, such as contractors, investigators, etc. This person will be responsible for collecting and maintaining all incident documents until any investigation is concluded.
- 4. <u>Identify Problems Requiring Immediate Action</u>: Identify any equipment problems, personnel problems, safety issues, or potential legal ramifications. If not critical, this topic may be saved for the critique.
- 5. <u>Positive Reinforcement</u>: Provide positive reinforcement for a good job and the hard work involved. Reinforce the things that went right and provide a commitment to correct the problems uncovered.

Post-Incident Investigation

There are many agencies and individuals who have a legitimate need for information about a significant hazardous material incident. They may include product manufacturers, shippers, adjacent landowners, insurance companies, government agencies and citizen groups. A post-incident investigation is the reconstruction of the incident in order to establish a clear picture of the events that took place during the incident. This is done in order to:

Determine the level of financial responsibility.

 Establish a clear picture of the facility emergency response for further study and improvement is necessary.

Further information on the procedures for a post-incident investigation at FPP may be found in Annex 4 (Incident Documentation).

Response Critique

Many lessons have been learned in response techniques as a result of critique sessions. Top management as a positive way to outline lessons learned supports an effective critique program. The more severe the incident, the more important it is to share what has been experienced.

A commitment to critique all hazardous material responses will improve emergency response personnel performance by improving efficiency and identifying weaknesses. A good critique mentally promotes:

- Trust in the response system as being self-correcting.
- Willingness to cooperate through teamwork.
- Continuing training of skills and response techniques.
- Preplanning for significant incident responses.
- Cooperation and sharing of information between response agencies.

Further information on the procedures for a response critique at FPP may be found in Annex 6 (Response Critique and Plan Review and Modification Process).



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1.0 PURPOSE

The purpose of this procedure is to prepare for and address freezing weather conditions to maintain station generating capability and reliability throughout the winter months (November – February). This procedure contains four sections: Pre-Season Preparation, Event Response, Post Season Closure and Monthly Winter Season Checks. Pre-Season Preparation will begin in August; Event Response will focus on operations and preventative measures during an actual freeze event; Post Season Closure will include finalizing documentation, unstaging equipment and restoring plant areas to pre-season status; and Monthly Winter Season Checks are PMs completed by the Operations and Maintenance Divisions beginning in November and ending in March each year.

2.0 DOCUMENTATION PROTECTION

This document contains ERCOT protected information as defined by Section 1.3.1 of the ERCOT Nodal Protocols. As such, the document and its contents are restricted from public release or access.

Protected information, in whatever form, may be disclosed to the directors, officers, employees, representatives, and agents of the party receiving the information, only on a "need to know" basis, that the party receiving the information shall make its directors, officers, employees, representatives, and agents aware of their internal obligations to protect the information, that all copies of the protected information created or maintained, in any format or form, be identified accordingly.

If protected information is to be shared with a third party vendor, confidentiality and/or nondisclosure agreement with that vendor must be first confirmed as (1) obligating the vendor receiving protected information to have procedures to ensure that protected information is securely maintained; (2) requiring that the vendor's internal distribution of protected information is reasonably restricted to appropriate individuals; and (3) requiring that the vendor make its directors, officers, employees, representatives, and agents aware of the confidentiality obligations.

3.0 REFERENCES

- 3.1 PUCT 25.53 Electric Service Emergency Operations Plans
- 3.2 PUCT 25.55 Weather Emergency Preparedness
- 3.3 EOP-011-2 Emergency Preparedness and Operations



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- 3.4 ERCOT Nodal Protocol Section 3.21 Submission of Emergency Operations Plans, Weatherization Plans, and Declarations of Summer and Winter Weather Preparedness
- 3.5 2012 Quanta Report on Extreme Weather Preparedness Best Practices

4.0 DEFINITIONS

- 4.1 **Cold Weather Critical Component** Any component that is susceptible to freezing or icing, the occurrence of which is likely to significantly hinder the ability of a resource or transmission system to function as intended, and for a generation entity, to lead to unit trip, derate, or failure to start of a resource.
- 4.2 Weather Emergency Preparation Measures Measures that a generation entity or transmission service provider takes to support the function of a facility during a weather emergency.
- 4.3 Weather Emergency A situation resulting from weather conditions that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT provides advance notice to market participants involving weather-related risks to the ERCOT power region.

5.0 SCOPE

This procedure includes four sections: Pre-Season Preparation, Event Response, Post-Season closure, and Winter Season Monthly Checks. Preparation for Winter operations will begin in August with predetermined PMs completed by Operations and Maintenance Divisions. Event Response will focus on operations and preventative measures taken during an actual freeze event, completed by designated crews. Post Season closure will include finalizing documentation, unstaging equipment and restoring plant areas to preseason status. Monthly Winter Season Checks are PMs completed by the Operations and Maintenance Divisions beginning in November and ending in March each year.

6.0 FAYETTE FACILTY PROFILE AND PLANT CONFIGURATION (EOP-011-2 R7.1)

Fayette Power Plant 6549 Power Plant Road LaGrange, Texas 78945 County: Fayette Description:

Fayette Power Project is a three-unit, coal-fired power plant near La Grange, Texas. The facility produces about 1,760 gross megawatts of electricity and helps LCRA and its

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wholesale electric customers provide electricity to more than 320,000 typical Texas homes when demand for power is highest.

Owner(s): LCRA and Austin Energy, which co-owns Units 1 and 2

Operator: LCRA

Year built: 1979 (Unit 1), 1980 (Unit 2), 1988 (Unit 3)

Capacity: Unit 1 can produce about 590 megawatts. Unit 2 can produce about 590

megawatts. Unit 3 can produce about 435 megawatts.

Fuel: Low-sulfur coal from the Powder River Basin in Wyoming

24/7 Control Room

7.0 PLANT MINIMUM AMBIENT OPERATING TEMPERATURES (PUCT 25.55 € and EOP-011-2 R7.3.2)

LCRA evaluated plant historical operations and experienced operating temperature	eratures to

8.0 FUEL

8.1 Coal Fuel – LCRA utilizes a long-term coal transportation contract, as well as both long- and shorter-term coal fuel supply contacts to provided adequate fuel deliveries for coal fired generation.

Continued coordination with both the

fuel and transportation suppliers throughout the winter months will be key to continuing to maintain generator reliability



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8.2

9.0 PRE-SEASON PREPARATION

- 9.1 Prior to the start of the winter season, Plant Personnel shall perform the following:
- 9.2 Review past issues, lessons learned and begin preparation for winter weather pursuant to this procedure.
- 9.3 Prior to December 1, complete all activities referenced in Pre-Season PM's
- 9.4 Automated PMs have been developed in the Maximo work management system to address the following:
- 9.5 Pre-season surveys (insulation, freeze protection panels, heat trace)
- 9.6 Insulation repairs
- 9.7 Install scaffolding, shrink wrapping and protective tarps
- 9.8 Stage salamander heaters as designated
- 9.9 The job plans in the PMs detail the procedures and provide the required checklists associated with the individual tasks. All PMs for freeze protection will be classified as 'WTH' for weatherization to closely monitor the completion of each task. The specific 'WTH' preseason PMs are listed below.
- 9.10 A Work Order will be auto generated at the specified time for each PM. The Area Supervisors are responsible for the completion of the PM work orders. The Area Supervisors will also review all completed checklists and submit items of concern or areas that require attention. Planning/Scheduling will write follow-up work orders to address the areas that require repair. The Compliance Coordinator will follow the whole process and store objective evidence.
- 9.11 An important piece to reliable winter operations is training. All Operations Shift Supervisors and Leads will complete a refresher training session pertaining to winter operations. The training material will consist of review of this procedure detailing Event Response. General winter operations safety training is beyond the scope of this procedure. The objective evidence will be put together and stored by the Compliance Coordinator.
- 9.12 When the preparation phase is complete, the Compliance Coordinator will provide the FPP Plant Director with a detailed summary of actions taken.



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9.13 After approval by the Plant Director the Compliance Coordinator will communicate "Completion of Winter Weather Readiness and Report" for Fayette Power Project and submit for sworn attestation to the LCRA Regulatory and Compliance Group.

PM	Job Plan	Crew	Job Summary
FP000637	FJ00004273	FFS1	Survey pipe/equipment insulation; Check freeze protection panels
FP000638	FJ00004274	FM15	Survey pipe/equipment insulation; prepare fuel cube
FP000639	FJ00004275	FO11	Inspect enclosures, visually inspect insulation, heat trace; thermometers
FP000641	FJ00004276	FM13	Inspect all piping/equipment for proper insulation and heat trace
FP000642	FJ00014090	FM14	Inspect all piping/equipment for proper insulation and heat trace
FP037112	FJ00010361	FM12	Inspect and test salamanders, stage in designated areas; verify tarp inventory
FP043569	FJ00014120	FOMA	Check EDGs, diesel fire pumps, transformer oil levels, fuel carts; stage heaters
FP050381	FJ00014099	FM16	Inspect heat trace & enclosures; inspect critical instrumentation sensing lines
00052824	0000016088	F040	Training and Document Review by Facility Personnel
FP053402	FJ00016348	FM15	Install scaffolding, tarps and shrink wrap as directed
FP053411	FJ00016349	FM13	Install scaffolding, shrink wrap, and tarps as directed; install plywood as directed
FP053412	FJ00016350	FM14	Install scaffolding, shrink wrap and tarps as directed

10.0 REGULATORY FILING OBLIGATIONS

By December 1, LCRA must submit to the PUCT and ERCOT, on a form prescribed by ERCOT and developed in consultation with PUCT staff, a winter weather readiness report that describes all activities taken by LCRA to complete the requirements of PUCT 25.55 paragraph (1). This also includes a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over the generation entity, attesting to the completion of all activities described in PUCT 25.55 paragraph (1) and the accuracy and veracity of the information described in PUCT 25.55 subparagraph (2)(A).

A generation entity may submit a request for a good cause exception with the PUCT to specific requirements listed in PUCT 25.55 paragraph (1). The request must include a detailed explanation of the inability to comply with the specific requirements and detailed description and supporting documentation of efforts that have been made to comply with the rules. The request shall also include a plan with a schedule to comply with the specific requirement. The request shall include a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over LCRA attesting to the accuracy and veracity of the information.

Submitting the winter weather readiness report required by PUCT 25.55 exempts LCRA from the requirement in Section 3.21 (3) of the ERCOT Protocols, which requires



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generation entities to submit a Declaration of Completion of Generation Resource Winter Weather Preparations no earlier than November 1 and no later than December 1 of each year. Should LCRA not submit the winter weather readiness report required by PUCT 25.55, LCRA shall submit the declaration to ERCOT in accordance with Protocol 3.21 (3).

In accordance with ERCOT Protocol 3.21 (2), revisions to weatherization plans must be submitted to ERCOT by June 1 for any updates made updates made between November 1 and April 30, and by December 1 for any updates made between May 1 through October 31. Plans shall be submitted electronically.

11.0 EVENT RESPONSE- Alert Levels – Day Ahead/Real-Time

Official forecasts will be obtained from the noaa.gov website, under zip code 78945.

salamanders are lit)

Left addition, the FPP Plant Director shall communicate additional internal staffing requirements with Plant Support Services (PSS) and other LCRA groups, if required.

Freeze Alert Level 0

- Forecasted Temperature is below 33°F for longer than 6 hours
- Compete the Pre-Event Checklist

Freeze Alert Level 1

- Forecasted/Actual Temperature is between 32° and 28°F for less than 6 hours
- Pre-Event Checklist should be completed.
- Priority 1 List should be completed.
- Salamanders are lit and instrumentation checks begin when temperature reaches 32°
- Salamander heaters must be checked every 4 hours

Freeze Alert Level 2

- Forecasted/Actual
 Temperature is between 32°
 and 28°F for more than 6
 hours
- Pre-Event Checklist should be completed.
- Priority 1 and 2 List should be completed two times per shift (every six hours).
- Additional staff called in to help with fueling salamander heaters and checking freeze protection.
- Salamander heaters must be checked every 4 hours

Freeze Alert Level 3

- Forecasted/Actual Temperature is below 28°F for more than 6 hours
- Complete Priority 1, 2, and 3 Checklists three times per shift (every four hours)
- Additional staff called in to help with fueling salamander heaters and checking freeze protection.
- Salamander heaters must be checked every 4 hours

12.0 EVENT RESPONSE -Cold Weather Staffing – Above normal operating shift levels

(To view editable chart - Cold Weather Staffing Plan - FPP, FRG & LPPP)

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13.0 EVENT RESPONSE – During an Event.

- 13.1 Plant Checklist to be completed can be found on the Operations Procedures SharePoint Site in the <u>Weatherization Folder</u>.
- 13.2 The PO will make the rounds checking the various equipment listed on the weatherization checklists.
- 13.3 The PO will fuel and light salamander heaters according to the matrix above beginning when temperatures reach 32°F.
- 13.4 The CRO will be responsible for completing the designated checklist for his/her specific unit. The PO will notify the CRO when tasks are completed as well as the conditions found. The CRO will complete the form with the information provided by field personnel. NOTE: There should not be any cell left blank on the checklists.
- 13.5 A record will be kept for each "Event Response Activation" regardless of actual temperature. NOTE: When a checklist is complete it should be turned in to the Shift Supervisor. All spreadsheets will be saved to complete an "event Packet" for shift supervisor review.
- 13.6 Issues found during plant rounds should be reported and submitted for repairs immediately. The Shift Supervisor in Charge will be responsible for designating a priority of repair.
- 13.7 The Plant Director or designee will make the call on when to come out of "Event Response" mode.

14.0 POST SEASON CLOSURE-

After the winter season, Plant Personnel shall perform the following:

- 14.1 Document and Review past issues, lessons learned and complete Freeze Event Packets.
- 14.2 Complete all activities referenced in Post-Season PM's
- 14.3 The job plans in the PMs detail the procedures and provide the required checklists associated with the individual tasks. All PMs for freeze protection will be classified as 'WTH' for weatherization to closely monitor the completion of each task. The specific 'WTH' postseason PMs are listed below.



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14.4 A Work Order will be auto generated at the specified time for each PM. The Area Supervisors are responsible for the completion of the PM work orders. The Area Supervisors will also complete all checklists and submit items of concern or areas that require attention. Planning/Scheduling will write follow-up work orders to address the areas that require repair. The Compliance Coordinator will follow the whole process and store objective evidence.

PM	Job Plan	Crew	Job Summary
FP037115	FJ00010364	FOMA	Return Salamanders to Storage, complete checklist, and Store Fuel Carts
FP037806	FJ010423	FM16	Inventory and Store Salamanders, Supervisor Work Order Review
FP043810	FJ00011663	FM13	Tarps, scaffolding and Shrink Wrap removal, Supervisor Work Order & Checklist Review
FP043869	FJ00011637	FM14	Tarps, scaffolding and Shrink Wrap removal, Supervisor Work Order & Checklist Review
FP043870	FJ00014416	FM15	Turn off & store Lube Oil Drum Heaters, Store Fuel Cube, Supervisor WO & Checklist Review
FP068294	FJ0000022407	FOMA	Post Season - Lessons Learned Data Collection - Event Packet Review and Upload

15.0 MONTHLY WINTER SEASON CHECKS

Beginning in November and extending through to March of each year, the following PMs are to be completed monthly.

PM	Job Plan	Crew	Job Summary
FP069997	FJ0000023437	FFS1	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FFS1)
FP069998	FJ0000023443	FO11	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FO11)
FP069999	FJ0000023438	FM13	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FM13)
FP070000	FJ0000023440	FO14	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FM14)
FP070001	FJ0000023441	FM15	U O FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FM15)
FP070002	FJ0000023442	FM16	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FM16)
FP070026	FJ0000023475	FOMA	U 0 FREEZE PROTECTION SEASONAL MONTHLY CHECKS (FOMA)

- **16.0 APPENDIX Insert** the items listed below in the appendices. If none of the attached appendices are used, leave them marked as N/A. Do not delete them
 - 15.1 REFERENCES N/A
 - 15.2 SYSTEM DESCRIPTION N/A



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COMI	MENTS/FEEDBACK
15.8	ATTACHMENTS - N/A
15.7	DURING EVENT CHECK LISTS – Link to checklists
15.6	PRE/POST/MONTHLY WINTER CHECKLISTS- Link to Checklists
15.5	TECHNICAL MANUALS – N/A
15.4	SINGLE LINES – N/A
15.3	PIPING AND INSTRUMENT DIAGRAMS – N/A

18.0 REVISIONS

Revision Table			
Date	New Revision #	Description of Change	Revised By
11/1/2016	0	Reconfigured procedure using cold weather matrix	Camden White, Dustin Stark



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11/1/2017	1	Changed the matrix for alert	Camden White
		levels 2 and 3 to make rounds	
		once every six hours; and once every four hours respectively;	
		added instrument air blowdown	
		and moisture trap drains to pre- event checklist.	
		event enectales.	
11/28/2017	2	Added wording to Matrix Alort	Amy Drapar
11/20/2017	2	Added wording to Matrix Alert levels 1,2, &3 to read:	Amy Draper
		Salamander heaters must be checked every 4 hours	
		Added a column with the header	
		"4hr Inspection Time & Initial" to	
		Hyperlinked FPP Freeze Protection Checklist	
		Protection Checklist	
		Changes/Revisions were made to	
		satisfy requirements of SMP 51.	
03/01/2018	3	Revised Section 6.2 Heading to	Amy Draper
		read: 6.2 Event Response Alert Levels – Day Ahead/Real-Time	
			Americ Dunnan
		Revised Section 6.3 to read: Cold Weather Staffing – <i>Above</i>	Amy Draper
		normal operating shift levels and	
		to include a chart of staffing requirements for FPP, FRG, &	
		LPPP	
04/12/2018	4	Revised Section 6.3 to read:	Amy Draper
		Freeze Alert Level 0 – Forecasted	
		Temperature is below 33°F for longer than 6 hours	
11/19/2021	5		Amy Garrett
11/19/2021	5	Revised procedure to align with new filing requirements, and	Alliy Gallett
		Quanta Recommendations. Made	



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wording changes, added Post Season and Monthly Winter Season Checks descriptions. Added LCRA Logo and Protected Information Header and Footer	
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19.0 CONTROLLED COPIES

Controlled Copy Number:	Location of Controlled Copy:	Location of Origin:
1 of 1	FPP Operations PROCEDURES SharePoint	X

20.0 SIGNATURES

Required Training Process Complete: Amy Garrett	Date:
Submitted by: FPP Compliance Coordinator - Amy Garrett	Date:
Approved by: FPP Director - JD Kilian	Date:

	FPP Freeze Protection - Pre-Event Checklist		
Shift Supervisor:		Unit 1 CRO	
		Unit 2 CRO	
	This list should be evaluated and completed by the CROs and Shift Supervisor on duty EACH SHIFT.	Unit 3 CRO	
		Aux CRO	

Indicates	s Fuel Yard			ALERT LEVEL 3 - INCLUDES LEVELS 0-2 ACTIVITIES				٧	erify each Sh	ift	Verify each Shift			٧	erify each S	hift
Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Pre-Event Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials
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	FPP Freeze Protection - Pre-Event Checklist		
Shift Supervisor:		Unit 1 CRO	
		Unit 2 CRO	
	This list should be evaluated and completed by the CROs and Shift Supervisor on duty EACH SHIFT.	Unit 3 CRO	
		Aux CRO	

Indicates	Fuel Yard			ALERT LEVEL 3 - INCLUDES LEVELS 0-2 ACTIVITIES				٧	erify each Sh	ift	٧	erify each Sh	ift	Verify each Shift		
Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Pre-Event Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials
PRE E	VENT															

FPP Freeze Protection - Pre-Event Checklist	
Shift Supervisor:	Unit 1 CRO
	Unit 2 CRO
This list should be evaluated and completed by the CROs and Shift Supervisor on duty EA	CH SHIFT. Unit 3 CRO
	Aux CRO

Alert Class Cuit Area Action (based on Level of Activation) Pre-Event Date Highland										
Level Class Cit Area Action (based on Level of Activation) Date (HH:MM) Initials Date (Verify each Shift									
	Initials									
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FPP Freeze Protection - Pre-Event Checklist

Shift Supervisor:		Unit 1 CRO	
		Unit 2 CRO	
	This list should be evaluated and completed by the CROs and Shift Supervisor on duty EACH SHIFT.	Unit 3 CRO	
		Aux CRO	

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PRE E	VENT														·	

FPP Freeze Protection - Pre-Event Checklist	
Shift Supervisor:	Unit 1 CRO
	Unit 2 CRO
This list should be evaluated and completed by the CROs and Shift Supervisor on duty EA	CH SHIFT. Unit 3 CRO
	Aux CRO

Indicate	s Fuel Yard			ALERT LEVEL 3 - INCLUDES LEVELS 0-2 ACTIVITIES				٧	erify each Sh	ift	V	erify each Sh	ift	V	erify each S	hift
Alert Level	Class	Unit		Action (based on Level of Activation)	Pre-Event Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials
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	FPP Freeze Protection - Pre-Event Checklist		
Shift Supervisor:		Unit 1 CRO	
		Unit 2 CRO	
	This list should be evaluated and completed by the CROs and Shift Supervisor on duty EACH SHIFT.	Unit 3 CRO	
		Aux CRO	

Indicates	s Fuel Yard			ALERT LEVEL 3 - INCLUDES LEVELS 0-2 ACTIVITIES				٧	erify each Sh	ift	Verify each Shift			Verify each Shift		
Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Pre-Event Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials
PRE E	VENT															

	FPP Freeze Protection - Pre-Event Checklist		
Shift Supervisor:		Unit 1 CRO	
		Unit 2 CRO	
	This list should be evaluated and completed by the CROs and Shift Supervisor on duty EACH SHIFT.	Unit 3 CRO	
		Aux CRO	

Indicates	s Fuel Yard			ALERT LEVEL 3 - INCLUDES LEVELS 0-2 ACTIVITIES				Verify each Shift			Verify each Shift			Verify each Shift		
Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Pre-Event Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials	Date	Time (HH:MM)	Initials
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	FPP Freeze Protection - Equipment Operation Level 3
Shift Supervisor:	

This list is completed by the CROs. Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection

Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Date	Time & Initials
Unit	1 CRO					

	FPP Freeze Protection - Equipment Operation Level 3
Shift Supervisor:	

This list is completed by the CROs. Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection

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Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Date	Time & Initials
Unit	2 CRO					

	FPP Freeze Protection - Equipment Operation Level 3
Shift Supervisor:	

This list is completed by the CROs. Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection

Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Date	Time & Initials
UNI	T 3 CRO					

	FPP Freeze Protection - Equipment Operation Level 3
Shift Supervisor:	

This list is completed by the CROs. Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection

Alert Level	Class	Unit	Area	Action (based on Level of Activation)	Date	Time & Initials
AUX	(CRO		·			

FPP F	reeze Protection - Salamander Checklists
Shift Supervisor:	Shift:

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

								Checks are to be performed every 3hrs				
							3hr	3hr	3hr	3hr	3hr	
Alert Level	Class	Unit		Burdenman	04-	Time Fired (HH:MM)	Inspect / Refuel Time & Initials2	Inspect / Refuel Time & Initials2	Inspect / Refuel Time & Initials 2	Inspect / Refuel Time & Initials 2	Inspect / Refuel Time & Initials2	
Alert Level		7-2	Area	Equipment	Qty	(IIII.WIWI)	Time & minars2	Time & initials2	Time & minas2	Time & minasz	Time & minars2	
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UNIT	1 SALA	MANE	ERS									

FPP F	reeze Protection - Salamander Checklists
Shift Supervisor:	Shift:

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

Checks are to be performed every 3hrs

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Salamanders are lit when temperature reaches 32°

Salamano	Salamanders are lit when temperature reaches 32"										
Alert Level	Class	Unit	Area	Equipment	Qty	Time Fired (HH:MM)	3hr Inspect / Refuel Time & Initials2				
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UNIT	C 2 SALA	MANI	ERS								

F	PP Freeze Protection - Salamander Checklists	
Shift Supervisor:	Shift:	

Qty

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Salamanders are lit when temperature reaches 32°

Equipment

Class

Unit

Area

Alert Level

shall inspect	the documentat				Packet.
tion		Checks are to be pe	errormed every 3nrs		
	3hr	3hr	3hr	3hr	3hr
Time Fired (HH:MM)	Inspect / Refuel Time & Initials2	Inspect / Refuel Time & Initials2	Inspect / Refuel Time & Initials2	Inspect / Refuel Time & Initials 2	Inspect / Refuel Time & Initials2
(HH:MM)	Time & minars2	Time & minais2	Time & minasz	Time & minais2	Time & minars2

FPP Fr	eeze Protection - Salamander Checklists
Shift Supervisor:	Shift:

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Iditional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection						Checks are to be performed every 3hrs					
dditional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection alamanders are lit when temperature reaches 32´											
I	is are in winer	T	T T T			I	3hr	3hr	3hr	3hr	3hr
	Class					Time Fired	Inspect / Refuel	Inspect / Refuel	Inspect / Refuel	Inspect / Refuel	Inspect / Refu
ert Level		Unit	Area	Equipment	Qty	(HH:MM)	Time & Initials2	Time & Initials2	Time & Initials2	Time & Initials2	Time & Initial
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FPP Freeze Protection - Salamander Checklists

Shift Supervisor:	Shift:

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks are to be performed every 3hrs

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Salamanders are lit when temperature reaches 32°

			I				3hr	3hr	3hr	3hr	3hr
	Class					Time Fired	Inspect / Refuel				
Alert Level	0.00.000000	Unit	Area	Equipment	Qty	(HH:MM)	Time & Initials2				
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FPP Freeze Protection - Critical Instrument Panels

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room. CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Instrumentation checks begin when temperature reaches 32°
Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Checks are to be performed every 3hrs
Ensure enclosures are closed & warm inside

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

Alert Level	Class	Unit	Area	Enclosure	Location	Equipment	Date	Time & Initials	Time & Initials2	Time & Initials3	Time & Initials4	Time & Initials5
		•										

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room.

CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Freeze Protection Panel checks begin when temperature reaches 32°

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

Alert Level	Class	Unit	Area	Panel	Location	MCC Breaker	No. Brkrs	Date	Time & Initials	Time & Initials2	Time & Initials3	Time & Initials4
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		1										
		1										
		I										

FPP Freeze Protection - Freeze Protection Panels

Shift Supervisor:	Na	nme:

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

This list is completed in the field and turned in to the respective Control Room.

CROs and Shift Supervision shall inspect the documentation and file this document in the Freeze Protection Packet.

Checks to be performed at 3hr intervals

Additional staff called in to help with 3hr Inspection, fueling salamander heaters and checking freeze protection Freeze Protection Panel checks begin when temperature reaches 32°

ALERT LEVEL 3 - INCLUDES LEVELS 1-2 ACTIVITIES

Alert Level	Class	Unit	Area	Panel	Location	MCC Breaker	No. Brkrs	Date	Time & Initials	Time & Initials2	Time & Initials3	Time & Initials4
		1										
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OPERATING PROCEDURE

UNIT:	Unit (U
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AREA: All Units

SUBJECT: Hot Weather Preparation and Actions

P&ID SYSTEM: Not Applicable

ORIGIN DATE: 5/18/11

REVIEWED DATE: 5/14/14 **REVISION NUMBER:** 3

APPROVAL DATE: 5/14/14 APPROVED BY: Kris Teinert

The purpose of this procedure is to prepare for and address hot weather conditions in order to maintain station generating capability and reliability through the summer months. The FPP Compliance Coordinator is responsible for monitoring, verifying, updating and reporting the status of these activities to the Compliance Department. A verification PM in his backlog will generate March 1, and he will report the status of hot weather preparations by May 15, listing any exceptions, and justifications for those exceptions. The Compliance Coordinator will ask the supervisors to sign off below on their respective areas. The Compliance Coordinator and the Plant Manager will submit an attestation of Hot Weather Readiness to the Compliance Department no later than May 31. Compliance Coordinator will file a scanned copy of this signed form in EDMS.

Note: Maximo PM's associated with weatherization can be tracked under the classification of PVM/WTH, or PDM/WTH.

OUR PROCEDURE WILL BE:

Operations Supervisor will complete the following by May 15

- 1. Ensure turbine deck exhaust fans are in service on all three units.
- 2. Ensure turbine building supply fans are in service, on the ground floor on Units 1&2 and the mezzanine level on Unit 3.
- 3. Ensure Units 1&2 SUBFP Motor back-up cooling fan is in place and available.
- 4. Start 3rd Circulating Water Pump based on water temperature, on all three units. Procedure for all units is **021 and 065 Two Versus Three Circulating Water pump Operation**.
- Verification that quarterly PM's to backflush BWCP Motor Coolers has been performed for all three units. Procedures: Units 1&2 is <u>053 Backflushing BWCP Coolers</u> and Unit 3 is <u>011 Boiler Circulating Water System</u>
- 6. Verification that quarterly PM to backflush Unit 3 Generator Hydrogen Coolers has been performed. Procedure is **046 Hydrogen Cooler Backflushing**.

Signature:	Employee ID No:	Date:
	· ·	

<u>Operations Supervisor</u> will assure the following actions and monitoring will be performed throughout the hot weather season

- 7. Based on lake level requirements, in the early spring start 2 or 3 River Pumps and fill the lake to 391' MSL and then keep 2 or 3 pumps in service throughout the warm weather season as needed. See Paragraph 26 of procedure
 - UO 1508 Response to High Discharge Canal Temp And Lake Overflow Alarms Procedure.
- 8. Backflush Units 1&2 Condensate Motor Coolers as needed –all units.
- 9. Flush Units 2 Condenser Vacuum Pump cooling water circuit water jackets as needed.

- 10. To help preserve cooling water pressure, close cooling water valves to idle equipment all units. Operations communicates this information to all shifts.
- 11. If available, reclaim higher Btu value coal to Units 1&2 from 0600 to 1800Hr.
- 12. Monitor discharge canal temperature trend. When the temperature exceeds 100F, the temperature of the official calibrated thermometer and the DAS indication will be checked and compared twice a week versus only once per week. If the temperature differential is 0.5F or greater, the DAS transmitter will be adjusted to the calibrated thermometer. Additional information and actions relating to the discharge canal temperature are contained in the linked policy and procedure. "FPP Policy 1508, "Cedar Creek Reservoir Discharge Canal Operation" and UO 1508 Response to High Discharge Canal Temp And Lake Overflow Alarms Procedure.

Signature:	_ Employee ID No:	_Date:
PdM Supervisor Alert Operations and Maintenance of any cormonths – all units.	ncerns with equipment making	it through the Hot Weather
Signature:	_ Employee ID No:	_ Date:
Facilities Supervisor Verify that the grassy areas to the west and e	east of the Discharge Canal ar	e shredded.
Signature:	_ Employee ID No:	_Date:
I&C Supervisor Verify completion of PM to calibrate Discharge Canal	temperature probe by June 1.	. Report status by May 15.
Signature:	_ Employee ID No:	_Date:
Maintenance Supervisor – Boiler Area Verify all heat-related PM's are up-to-date by Units 1&2, and adequate coal mills are available.		
Signature:	_ Employee ID No:	_Date:
Maintenance Supervisor – Turbine/Generator Are Verify all heat-related PM's are up-to-date by		15.
Signature:	_ Employee ID No:	_Date:
Maintenance Supervisor – FGD/Fly Ash/Precip A Verify all heat-related PM's are up-to-date by		15.
Signature:	_ Employee ID No:	_Date:
Maintenance Supervisor – Electrical Area Verify all heat-related PM's are up-to-date by	June 1. Report status by May	15.
Signature:	_ Employee ID No:	_Date:
Maintenance Supervisor – HVAC Verify all PM's for HVAC systems serving crit of on-site backup air conditioning units up to by May 15.		
Signature:	_ Employee ID No:	Date:



Lost Pines Power Park

Lost Pines 1

Title/Subject: Fall Preparation For A Freezing Weather Season

Revision Date: November 23, 2021

Revision: 2.10 Status: Active

PURPOSE

The purpose of this procedure is to cover all activities that are required to be conducted in preparation of freezing weather.

P	RO	CF	ח	ш	RF	:
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The Following Actions Are To Be Performed By LPPP Personnel. YOU MUST PUT A CHECK MARK IN THE APPROPRIATE BOX.

1.0	PM# LP043374 Task 50			
Name_	Signature	_ Date		
			YES	NO

2.0	PM# LP044745 Task 20		
	PM# LP044745 Task 20		
Name_	Signature	Date	
		YES	NO
Note	The Following	-	
Note	The Following		
1	Verify Operation of		

Page **2** of **9**

Continued		YES	NO
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3.0			
Position	In The I	ollowin	ıg
Locations	PM# LP025646 Task 20		
Name	Signature Date_		
		VEC	NO
		YES	NO
Position Name			
		YES	NO
T I			

Page **3** of **9**

Continued			YES	NO
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		Date		
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Name		Date		
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Name	Signature	In Place		NO
I	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO
Name	Signature	In Place	YES	NO

Page **4** of **9**



Page **5** of **9**



Page **6** of **9**

Continued			YES	NO
8.0 Verification Of		PM# LP0534	l99 Task	30
Name	Signature	Date		
			YES	NO
			-	
9.0				
Verification of Comp	oletion of	PM# LP069489 PM# LP0534	l99 Task	60
Name	Signature	Date		_
10.0		_		
Verification Of		PM# LP025646 Task 140		
Name	Signature	Date		
11.0 Verification of		DM#1 D0524	100 Taal	. 20
		PM# LP0534		
Name	Signature	Date		
12.0 Order		PM# LP0534	l99 Task	4 0
	Signature	Date		

13.0 Verification of	PM# LP0	46425	
Name	Signature	Date	
14.0 Verification of		PM# LP062313	
Name	Signature	Date	
15.0 Ide (List Any Abnormalities That Were Ide	entified ntified And The Corrective Actions	Taken)	
	ISSUES	,	WO#

Revision No.	Date	Author	Revision(s) Made
1.0	9-20-11	J.Kessel	Created
1.1	10-10-11	J.Kessel	
1.2	12-5-11	J.Kessel	
1.3	10-5-12	J.Kessel	
1.4	12-12-12	J.Kessel	
1.5	1-8-13	J.Kessel	
1.6	1-10-13	J.Kessel	
2.0	3-30-16	J.Dinn	

Page **8** of **9**

2.1	10-12-16	J.Dinn	
2.2	10-28-16	J.Dinn	
2.3	10-03-17	J.Dinn	
2.4	10-24-17	J.Dinn	
2.5	10-31-17	J.Dinn	
2.6	11-7-18	J.Dinn	
2.7	9-17-19	J.Dinn	
2.8	12/4/20	J.Dinn	
2.9	8-19-21	J.Dinn	
2.10	11-23-21	J.Dinn	



Lost Pines Power Park

Lost Pines 1/Sim Gideon/Winchester

Title/Subject: Freezing Weather Season Materials Inventory Count Sheet

Revision Date: August 19, 2021

Revision: 1.3 Status: Active

The following materials have been inventoried and all items not meeting current "status" on hand quantities have

been ordered.

1.0

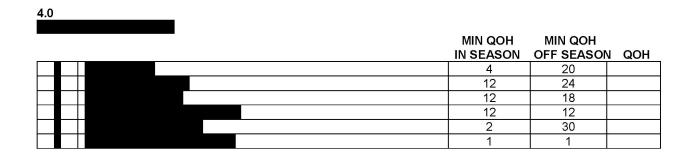
	MIN QOH		
	IN SEASON	OFF SEASON	QOH
	10	10	
	1	3	
	1	3	
	2	4	
	3	10	

2.0

		MIN QOH	MIN QOH	
_		IN SEASON	OFF SEASON	I QOH
		15	20	
		18	30	
		20	40	
		15	20	
		10	15	
		10	15	
		10	15	
		10	15	
		20	30	

3.0

		MIN QOH IN SEASON	MIN QOH OFF SEASON	I QOH
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		3	10	
		10	50	
		2	6	
		2	8	



5.0					
	_		MIN QOH	MIN QOH OFF SEASON	1 004
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6.0				
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		IN SEASON	OFF SEASON	QOH
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		1	3	
		1	1	
		1	3	

7.0			
<u> </u>	MIN QOH		
	IN SEASON	OFF SEASON	QOH
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	10	10	
	2	5	
	3	3	
	4	4	

8.0			
	MIN QOH IN SEASON	MIN QOH OFF SEASON	I QOH
	1	3	
	5	10	
	3	10	
	1	1	
	1	1	
	1	3	
	1	3	
	1	1	
	2	6	
	1	2	

Page 2 of 3

Revision No.	Date	Author	Revision(s) Made
1.0	3-1-16	J. Dinn	Created
1.1	1-4-17	J. Dinn	
1.2	10-03-17	J. Dinn	
1.3	8-19-21	J.Dinn	



Lost Pines Power Park Lost Pines 1

Title/Subject: Preparation For A Pending Freezing Weather Event

Revision Date: December 16, 2021

Revision: 3.9 Status: Approved

PURPOSE

The purpose of this procedure is to provide a formal checklist for actions to be taken prior to the arrival of freezing weather and minimize the risk of forced outage due to equipment failure. This will be decided by Plant Management.



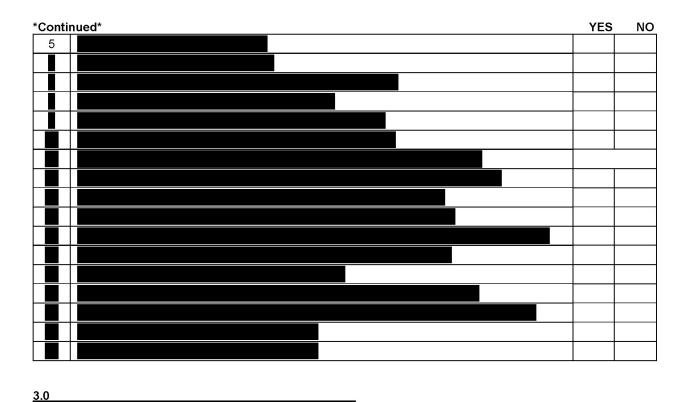
The Following Shall Be Verified: Supervisor. YOU MUST PUT A CHECK MARK IN THE APPROPRIATE BOX.

Name	Signature	Date

1.0 Freeze Protection Panels

	YES	NO
1		

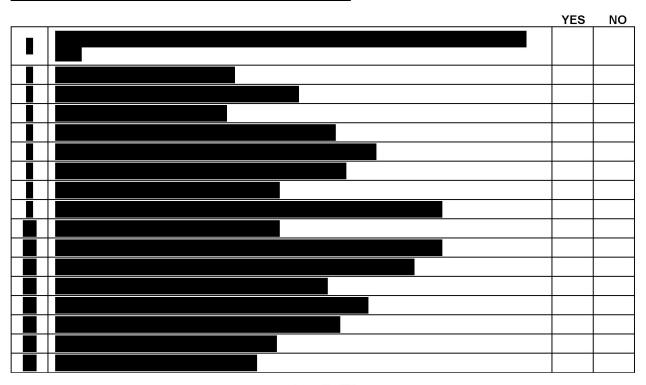
2.0		
	YES	NO



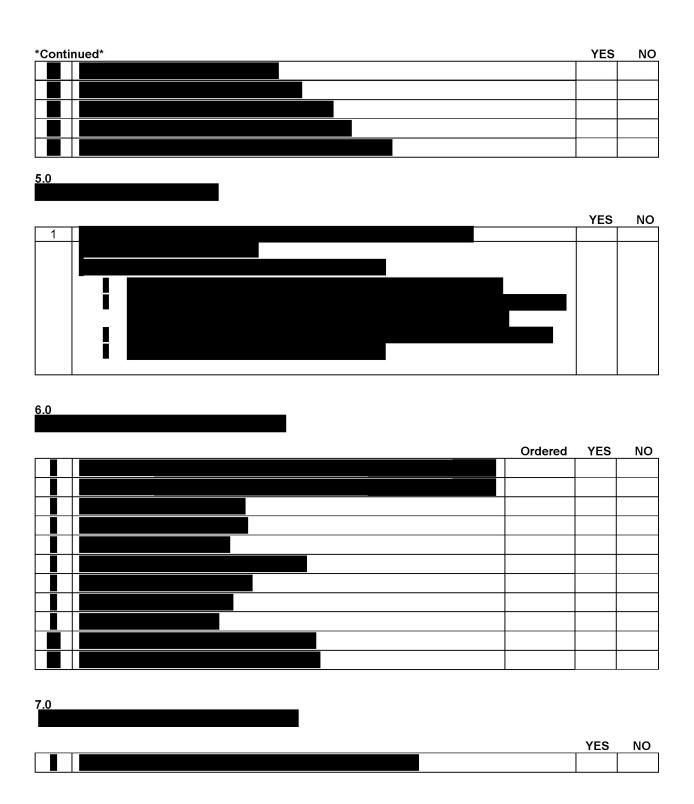




4.0



Page 2 of 5



8.0		
	ISSUES	WO#

Revision No.	Date	Author J.Kessel R.Chilek	Revision(s) Made Created
1.0	9-20-11	J.Kessel	Created
1.1	12-5-11	R.Chilek	
			.0 - #3
1.3	10-5-12	J.Kessel	
1.4	1-8-13	J.Kessel	
2.0	3-23-16	J.Dinn	

Page 4 of 5

3.0	1/5/17	B.Clappison	Added breaker location and identifiers to Section 1.0 lines 1-3. Removed waste high verbiage from Section 5.0
3.1	10-03-17	J. Dinn	
3.2	01-12-18	J. Dinn	
3.3	11-07-18	J. Dinn	Replaced Some Tarps with Scaffold Sheeting
3.4	1/25/19	B. Clappison	
3.5	9-17-19	J.Dinn	
3.7	8-20-21	J.Dinn	
3.8	11-23-21	J.Dinn	Removed HanPhi Review per LPPP Management
3.9	12-16-21	J.Dinn	
	<u> </u>		

CONFIDENTIAL - PROTECTED INFORMATION

1.0 PURPOSE

The purpose of this procedure is to prepare for and address freezing weather conditions in order to

This procedure is divided into two sections:

2.0 DOCUMENTATION PROTECTION

CONFIDENTIAL - PROTECTED INFORMATION

This document contains ERCOT protected information as defined by Section 1.3.1 of the ERCOT Nodal Protocols. As such, the document and its contents are restricted from public release or access.

Protected information, in whatever form, may be disclosed to the directors, officers, employees, representatives, and agents of the party receiving the information, only on a "need to know" basis, that the party receiving the information shall make its directors, officers, employees, representatives, and agents aware of their internal obligations to protect the information, that all copies of the protected information created or maintained, in any format or form, be identified accordingly.

If protected information is to be shared with a third party vendor, confidentiality and/or nondisclosure agreement with that vendor must be first confirmed as (1) obligating the vendor receiving protected information to have procedures to ensure that protected information is securely maintained; (2) requiring that the vendor's internal distribution of protected information is reasonably restricted to appropriate individuals; and (3) requiring that the vendor make its directors, officers, employees, representatives, and agents aware of the confidentiality obligations.

3.0 REFERENCES

- 3.1 PUCT 25.53 Electric Service Emergency Operations Plans
- 3.2 PUCT 25.55 Weather Emergency Preparedness
- 3.3 EOP-011-2 Emergency Preparedness and Operations
- 3.4 ERCOT Nodal Protocol Section 3.21 Submission of Emergency Operations Plans, Weatherization Plans, and Declarations of Summer and Winter Weather Preparedness
- 3.5 2012 Quanta Report on Extreme Weather Preparedness Best Practices

LCRA Page 2 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100
PROCEDURE USE: REFERENCE		LOCATI	ON: LP1
SUBJECT:			

CONFIDENTIAL - PROTECTED INFORMATION

4.0 DEFINITIONS



5.0 LOST PINES 1 POWER PROJECT FACILTY PROFILE AND PLANT CONFIGURATION (EOP-011-2 R7.1)

Lost Pines 1

256 Power Plant Road

Bastrop, Texas 78602

County: Bastrop

Year built: 2001

Capacity: About 510 megawatts

Fuel: Natural gas, combined-cycle

Owners: LCRA and Gentex Power Corporation, an LCRA affiliated corporation

GENERATION

DATE: 11/16/2021

REV
1.0

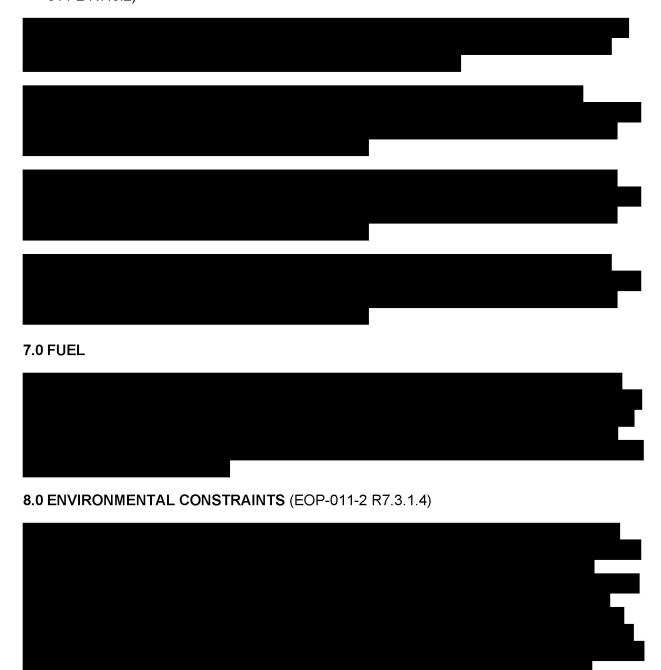
PROCEDURE: LP1-OPS-WTH-0100

LOCATION: LP1

SUBJECT: Plant Freeze Protection Plan

CONFIDENTIAL - PROTECTED INFORMATION

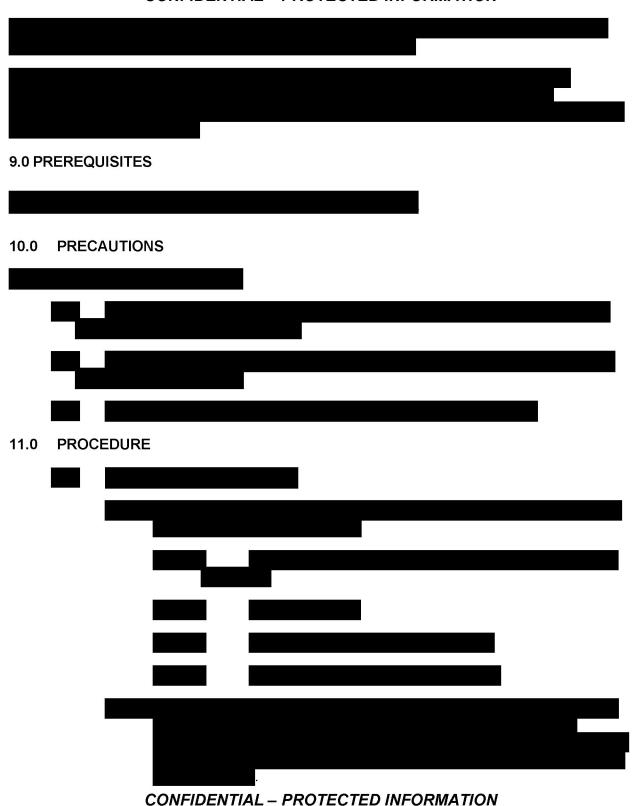
6.0 PLANT MINIMUM AMBIENT OPERATING TEMPERATURE (PUCT 25.55 (E) and EOP-011-2 R7.3.2)



CONFIDENTIAL – PROTECTED INFORMATION

LCRA Page 4 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100
PROCEDURE USE: REFERENCE		LOCATI	ON: LP1
SUBJECT: Plant Freeze Protection Plan			



GENERATION

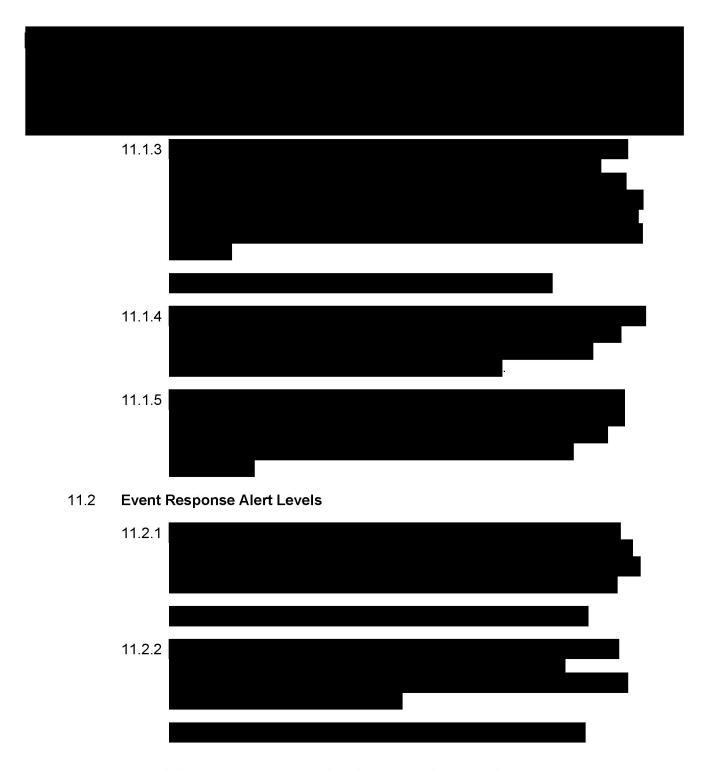
DATE: 11/16/2021

REV
1.0

PROCEDURE: LP1-OPS-WTH-0100

LOCATION: LP1

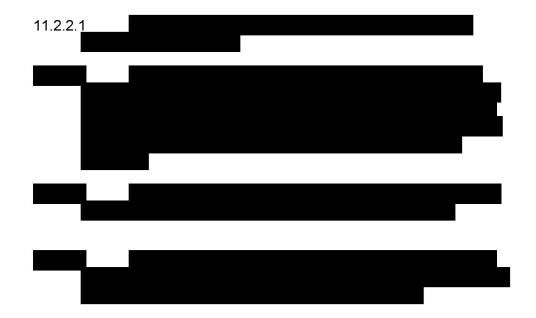
SUBJECT: Plant Freeze Protection Plan



CONFIDENTIAL – PROTECTED INFORMATION

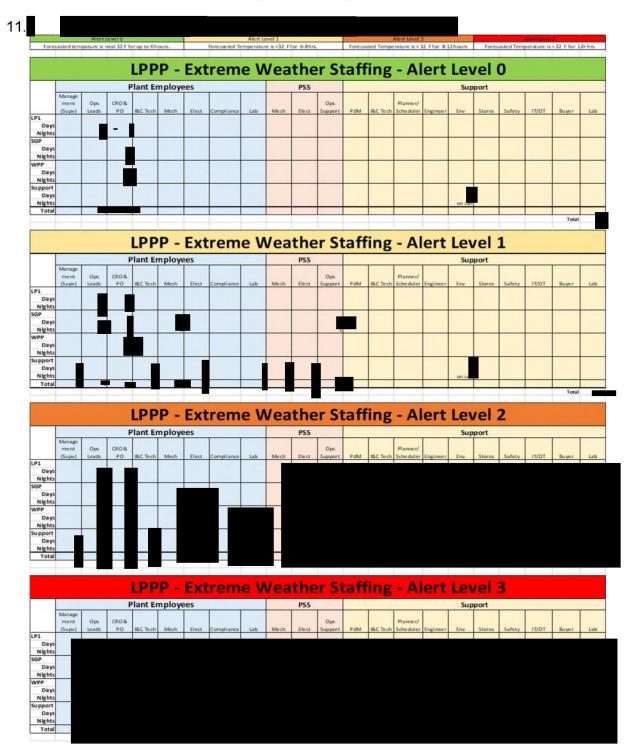
LCRA Page 6 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100
PROCEDURE USE: REFERENCE		LOCATI	ON: LP1
SUBJECT: Plant Freeze Protection Plan			



LCRA Page 7 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100	
PROCEDURE USE: REFERENCE		LOCATI	ON: LP1	
SUBJECT: Plant Freeze Protection Plan				



CONFIDENTIAL – PROTECTED INFORMATION

12.0 REGULATORY FILING OBLIGATIONS

By December 1, LCRA must submit to the PUCT and ERCOT, on a form prescribed by ERCOT and developed in consultation with PUCT staff, a winter weather readiness report that describes all activities taken by LCRA to complete the requirements of PUCT 25.25 paragraph (1). This also includes a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over the generation entity, attesting to the completion of all activities described in PUCT 25.25 paragraph (1) and the accuracy and veracity of the information described in PUCT 25.25 subparagraph (2)(A).

A generation entity may submit a request for a good cause exception with the PUCT to specific requirements listed in PUCT 25.25 paragraph (1). The request must include a detailed explanation of the inability to comply with the specific requirements and detailed description and supporting documentation of efforts that have been made to comply with the rules. The request shall also include a plan with a schedule to comply with the specific requirement. The request shall include a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over LCRA attesting to the accuracy and veracity of the information.

Submitting the winter weather readiness report required by PUCT 25.25 exempts LCRA from the requirement in Section 3.21 (3) of the ERCOT Protocols, which requires generation entities to submit a Declaration of Completion of Generation Resource Winter Weather Preparations no earlier than November 1 and no later than December 1 of each year. Should LCRA not submit the winter weather readiness report required by PUCT 25.25, LCRA shall submit the declaration to ERCOT in accordance with Protocol 3.21 (3).

In accordance with ERCOT Protocol 3.21 (2), revisions to weatherization plans must be submitted to ERCOT by June 1 for any updates made updates made between November 1 and April 30, and by December 1 for any updates made between May 1 through October 31. Plans shall be submitted electronically.

13.0 EVENT/SEASON CONCLUSION



CONFIDENTIAL - PROTECTED INFORMATION

LCRA Page 9 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100							
PROCEDURE USE: REFER	RENCE	LOCATION: LP1								
SUBJECT: Plant Freeze Protection Plan										

CONFIDENTIAL – PROTECTED INFORMATION



14.0	COMMENTS/FEEDBACK	
_		
_		
_		
_		
-		

15.0 REVISIONS

LCRA Page 10 of 10

GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: LP1-OPS-WTH-0100							
PROCEDURE USE: REFER	RENCE	LOCATION: LP1								
SUBJECT: Plant Freeze Protection Plan										

CONFIDENTIAL - PROTECTED INFORMATION

Revision Table			
Date	New Revision #	Description of Change	Revised By
11/16/2021	1.0	CREATION	JACQUELINE DINN

16.0 ANNUAL REVIEW SIGNATURE

Recoverable Signature

x Jeff Dyer

Jeff Dyer

LPPP Maintenance Supervisor

Signed by: Jeff Dyer

Recoverable Signature

X Jason von Minden

Jason von Minden

LPPP Operations Supervisor

Signed by: Jason von Minden

Recoverable Signature

X James N Willey

Jim Willey

LPPP Plant Director

Signed by: James N Willey



Lost Pines Power Park Lost Pines 1

Title/Subject: Actions To Take During A Freezing Weather Event

Revision Date: January 14, 2022

Revision: 3.8 Status: Approved

PURPOSE			
PROCEDURE During freezing weather,			
	lemented by the Shift Supervisor . Il boxes must be answered.	·	
Lead Multi-Craft Technicia	an/Designee 00:00-04:59		
Name	Signature	Date	
Lead Multi-Craft Technicia	an/Designee 05:00-16:59		
Name	Signature	Date	
Lead Multi-Craft Technicia	an/Designee 17:00-23:59		
Name	Signature	Date	
LP1 DCS Ambient Temper	ature Below 32.0 Date	Time	
LP1 DCS Ambient Temper	ature Above 32.0 Date	Time	_
LP1 DCS Ambient Temper	ature Below 32.0 Date	Time	_
LP1 DCS Ambient Temper	ature Above 32.0 Date	Time	

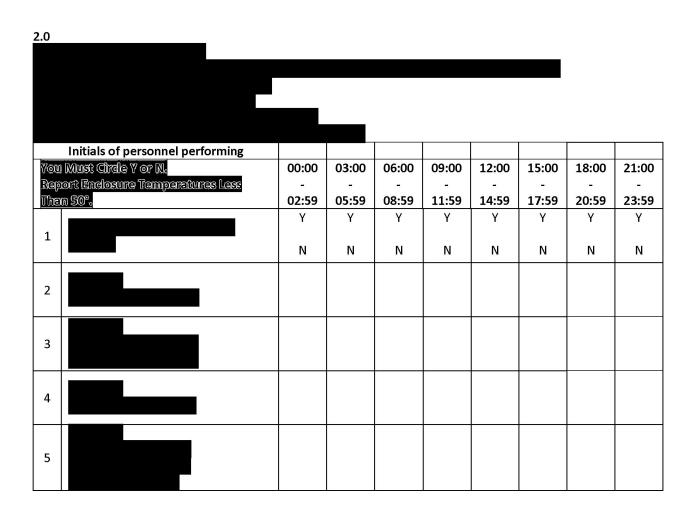
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Page 2 of 14

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Page 3 of 14

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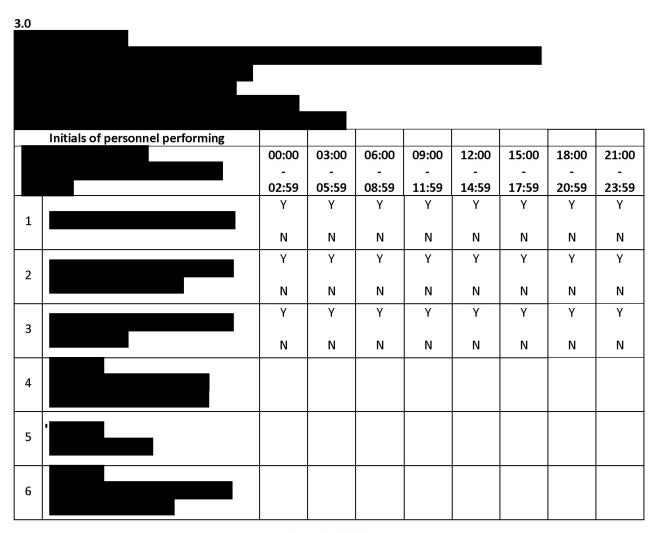
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4.0 TRANSFORMERS

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		Y	Y	Y	Υ	Υ	Y	Y	Υ
8		N	N	N	N	N	N	N	N
		Y	Y	Y	Y	Y	Y	Y	Y
9			N	N	N			N	N
		N				N	N		
10		Y	Y	Y	Y	Y	Y	Y	Y
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		Y	Y	Y	Y	Y	Y	Y	Y
11		N	N	N	N	N	N	N	N

6.0 STORAGE TANK LEVELS

	Initials of personnel performing		
		0500	1700
1			
2			
3			

7.0	
ISSUES 00:00 - 04:59	WO#

ISSUES 05:00 - 16:59	WO#

WO#

Revision No.	Date	Author	Revision(s) Made
1.0	9-21-11	J.Kessel	Created
1.1	3-21-14	S. Werner	Time and Temp Revised
2.0	3-23-16	J.Dinn	
2.1	12-19-16	J.Dinn	Added Date Fields
2.2	01-11-17	J.Dinn	Change formats to clearly
2.3	10-03-17	J.Dinn	cover one 24hr period. Added Portable Kerosene
			Tank
2.4	01-12-18	J.Dinn	Removed Polymer Tank Heater Removed Date Field Added a Temporary Section
2.5	01-29-18	J.Dinn	
3.0	11-07-18	J.Dinn	Changed Format for Rounds to Question and Answer
3.1	1/25/19	B. Clappison	f
3.2	9-17-19	J.Dinn	
3.3	12/4/20	J.Dinn	

Page 13 of 14

			7.0 Removed Temporary Requirements
3.4	2-12-21	J.Dinn	Added CEMS Shelter Temperature Checks
3.5	8-20-21	J.Dinn	
3.6	11-23-21	J.Dinn	Removed HanPhi Review per LPPP Management
3.7	12-30-21	J.Dinn	Added Safety Shower and Eyewash Stations Changed Vacuum Braker to Permanent Wall
3.8	1-14-22	J. von Minden	Operations made numerous documentation revisions to order / flow of checklists to make it more user friendly/efficient when filling out in the field. No items were removed or time intervals adjusted.



Lost Pines Power Park Lost Pines 1

Title/Subject: Actions To Take At The Conclusion Of Freezing Weather Conditions Checklist

Revision Date: December 30, 2021

Revision: 1.3 Status: Approved

PURPOSE

The purpose of this procedure is to cover all activities that are required to be conducted after a freezing weather event or at the conclusion of the winter season when freezing weather is no longer anticipated.

PROCEDURE

The following actions shall be performed at the conclusion of a freezing weather event, or at the conclusion of the winter season when freezing weather conditions are not a threat. Season end to be determined by plant management.

Operator	Date
Operator	Butc

1.0

Actions To Be Performed After A Freezing Weather Event:		N/A	YES	NO
1	Unplug All Associated Heat Lamps			
2	Unplug All Associated Electric Heaters			
3	Switch Heaters to the "OFF" Position and Unplug (Leave Heaters In Place)			
4	Disconnect All E-carts			
5	Assess Any Damage Incurred To Tarps And Replace If Necessary			
6	Assess Any Damage Incurred Upon The Facility During The Freeze Weather Event			
	And Take Appropriate Action			
7	Return (5) Safety Showers and Eyewash Stations to Normal Operation			

2.0

Action	s To Be Performed At The End Of The Winter Season:	N/A	YES	NO
1	Allow All Kerosene Heaters To Operate Until All Fuel Is Burned Off / Then Switch Heaters to the "OFF" Position			
2	Remove All Kerosene Heaters From Their Associated Locations And Verify Integrity			
3	Remove All Electric Heaters / Heat Lamps From Their Associated Locations And Verify Integrity			
4	Remove All Associated Tarps And Assess Replacement Needs			
5	Store All Tarps In The Proper Areas			
6	Store All Heaters In The Proper Areas			
7	Inspect All Freeze Protection Cords, GFCI Adapters And Associated Equipment With CordsAll Extension Cords, GFCI Adapters, Heat Lamp Cords, Kerosene Heaters And All Equipment Used For Freeze Protection Needs To Be Inspected Prior To Storage. Please Mark All Good Cords With White Electrical Tape. Also Mark Them With A Yellow Tape So They Are Designated For Freeze Protection Only			
8	Identify Any Faulty Items, Make List So Replacements Can Be Bought			

Revision No.	Date	Author	Revision(s) Made
1.0	9-20-11	J.Kessel	Created
1.1	1-8-13	J.Kessel	Revised Section (1.0) item #3. Heaters will remain fueled after Freezing Weather Events
1.2	1/10/2020	B.Clappison	Added line to Section (1.0) item #4. Disconnect All E-carts
1.3	12-30-21	J.Dinn	Added Safety Shower and Eyewash Stations



Lost Pines Power Park Sim Gideon

Title/Subject: Fall Preparation For Freezing Weather Season

Revision Date: November 23, 2021

Revision: 3.8 Status: Approved

PURPOSE

The purpose of this procedure is to cover all activities that are required to be conducted in preparation of freezing weather.

PROCEDURE

The Following Actions Are To Be Performed By LPPP Personnel. YOU MUST PUT A CHECK MARK IN THE APPROPRIATE BOX.

1.0	PM# GP002382 Task 10			
Name_	Signature	Date		
			YES	NO
I				

2.0	PM# GP002382 Task 11			
Name	Signature	Date		
			YES	NO
				-
			$ \bot $	
3.0	PM# GP002382 Task 12			
Name	Signature	Date		
			YES	NO
-				
4.0				
4.0	PM# GP059482 Task 40			
Name	Signature	Date		
		N/A	YES	NO
				

Page **2** of **7**

5.0			
PM# GP031809 Task 110			
Name	Signature		
		YES	NO
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		_	
6.0			
6.0	PM# GP002383 Task 60		
Name	Signature	Date	
		YES	NO

Page **3** of **7**



7.0	PM# GP031809 Task 120			
Name_	Signature	Date		
			YES	NO

Page **4** of **7**

Continued*			YES	NO
.0	PM# GP002382 Task 15			
lame	Signature	Date		
			YES	NO
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			YES	NC
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lame	Signature	Date		
1.0				
	PM# GP002382 Task 14			
lame	Signature	Date		

12.0 Verification of		PM# GP059482 TASK 30	
Name	Signature	Date	
13.0		PM# GP031809 TASK 150	
Name	Signature	Date	
14.0 (List Any Abnormalities Th	at Were Identified And The Correc	tive Actions Taken)	
	ISSUES	,	WO#

Revision No.	Date	Author	Revision(s) Made
1.0	10-6-11	J.Kessel	Created
1.1	4-19-11	J.Kessel	
1.2	12-12-12	J.Kessel	
1.3	10-11-13	J.Kessel	
1.4	09-09-14	S. Werner	
2.0	3-23-16	J. Dinn	

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2.1	2-15-17	J. Dinn	
2.2	2-21-17	J. Dinn	
2.3	9-20-17	J. Dinn	
2.4	11-2-17	J. Dinn	_
3.0	9-28-18	J. Dinn	
3.1	11-2-18	J.Dinn	П
3.2	9-13-19	J.Dinn	
3.3	10-31-19	J.Dinn	
3.4	11-5-19	J.Dinn	
3.5	9-14-20	J.Dinn	1
3.6	12-7-20	J.Dinn	
3.7	9-16-21	J.Dinn	
3.8	11-23-21	J.Dinn	



Lost Pines Power Park Sim Gideon

Title/Subject: Preparation For A Pending Freezing Weather Event

The purpose of this procedure is to provide a formal checklist for actions to be taken p

Revision Date: December 30, 2021

least a seven (7) day span between events.

Revision: 3.8 Status: Approved

Рι	JR	PΟ	SE

	I his will be decided by Plant Management.
PROCEDURE In the event of oncoming freezing weather,	
. The following is a list of those areas that require special attention	on T
	vill need to be performed again if there is at

The Following Shall Be Verified: Supervisor. YOU MUST PUT A CHECK MARK IN THE APPROPRIATE BOX.

Name	Signature	_ Date		
Unit 1 Status			YES	NO
Unit On-Line or Intent to Start-Up	Communicated			
Unit 2 Status Unit On-Line or Intent to Start-Up	Communicated		YES	NO
Unit 3 Status Unit On-Line or Intent to Start-Up	Communicated		YES	NO

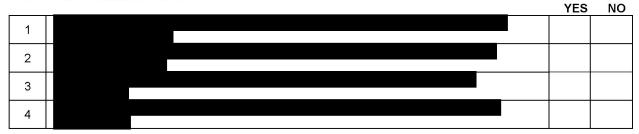
1.0 Unit 1 Freeze Protection Panels/Critical Heat Strips

		ILO	NO
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2			
3			
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5			
6			
7			

2.0 Unit 2 Freeze Protection Panels

		YES	NO
1			
2			
3			
4			

3.0 Unit 3 Freeze Protection Panels



4.0 Fill Kerosene Heaters, Connect Power Cords to Kerosene Heaters, Electric Heaters, Heat Lamps or Heat Strips In The Following Locations



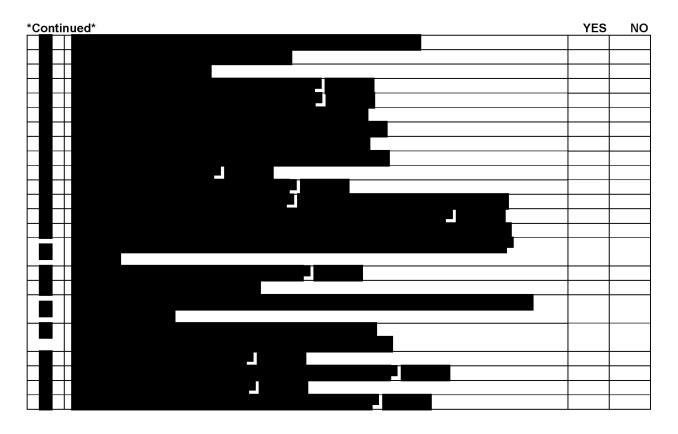
5.0 The Following Shall be performed



6.0 A Visual Observation Shall Be Performed Of The Following



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7.0		
Verification of Critical	Transmitter Availabi	lity

	152	NO

8.0 Verification of Critical Transmitter Freeze Protection Circuits and Cabinet Heat Sources are Operational and Thermostats set to 75°

 YES	NO

9.0 Freeze Protection Abnormalities Identified

(List Any Abnormalities That Were Identified During The Shift And The Corrective Actions Taken)

ISSUES	WO#

10.0

Guide For Draining Boilers 'Not' In Operation

Note: This shall be performed after communication with the Gendesk and determining that the unit(s) will not be called for in the very near future.

1. Our protocol will be t



Revision No.	Date	Author	Revision(s) Made
1.0	10-6-11	J.Kessel	Created
1.1	3-28-12	J.Kessel	Added
1.2	4-19-12	J.Kessel	Moved Sections 2.0 and 3.0 To '
1.3	7-10-12	J.Kessel	Added
2.0	3-23-16	J.Dinn	Update Purpose with
2.1	11-23-16	J. Dinn	Added DA Tarps
2.2	2-21-17	J.Dinn	Removed
2.3	11-2-17	J.Dinn	Removed
2.4	12-19-17	J.Dinn	Removed
2.5	01-12-18	J.Dinn	Added all
3.0	09-28-18	J.Dinn	Removed

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3.1	09-13-19	J.Dinn	Added
3.2	10-31-19	J.Dinn	Removed
3.3	11-5-19	J.Dinn	Added
3.4	12-7-20	J.Dinn	Section 6.0
3.5	11-16-21	J.Dinn	Added Several Locations for
3.6	11-23-21	J.Dinn	Removed
3.7	12-16-21	J.Dinn	Added
3.8	12-30-21	J.Dinn	Removed

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1.0 PURPOSE



2.0 DOCUMENTATION PROTECTION

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This document contains ERCOT protected information as defined by Section 1.3.1 of the ERCOT Nodal Protocols. As such, the document and its contents are restricted from public release or access.

Protected information, in whatever form, may be disclosed to the directors, officers, employees, representatives, and agents of the party receiving the information, only on a "need to know" basis, that the party receiving the information shall make its directors, officers, employees, representatives, and agents aware of their internal obligations to protect the information, that all copies of the protected information created or maintained, in any format or form, be identified accordingly.

If protected information is to be shared with a third party vendor, confidentiality and/or nondisclosure agreement with that vendor must be first confirmed as (1) obligating the vendor receiving protected information to have procedures to ensure that protected information is securely maintained; (2) requiring that the vendor's internal distribution of protected information is reasonably restricted to appropriate individuals; and (3) requiring that the vendor make its directors, officers, employees, representatives, and agents aware of the confidentiality obligations.

3.0 REFERENCES

- 3.1 PUCT 25.53 Electric Service Emergency Operations Plans
- 3.2 PUCT 25.55 Weather Emergency Preparedness
- 3.3 EOP-011-2 Emergency Preparedness and Operations
- 3.4 ERCOT Nodal Protocol Section 3.21 Submission of Emergency Operations Plans, Weatherization Plans, and Declarations of Summer and Winter Weather Preparedness
- 3.5 2012 Quanta Report on Extreme Weather Preparedness Best Practices

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GENERATION	DATE: 11/16/2021	REV 1.0	PROCEDURE: SGP-OPS-WTH-0100
PROCEDURE USE: REFER	RENCE	LOCATION: Sim Gideon	
SUBJECT: Plant Freeze Protection Plan			

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4.0 DEFINITIONS

- 4.1 Cold Weather Critical Component Any component that is susceptible to freezing or icing, the occurrence of which is likely to significantly hinder the ability of a resource or transmission system to function as intended, and for a generation entity, to lead to unit trip, derate, or failure to start of a resource.
- 4.2 Weather Emergency Preparation Measures Measures that a generation entity or transmission service provider takes to support the function of a facility during a weather emergency.
- 4.3 **Weather Emergency** A situation resulting from weather conditions that produces significant risk for a TSP that firm load must be shed or a situation for which ERCOT provides advance notice to market participants involving weather-related risks to the ERCOT power region.

5.0 SIM GIDEON POWER PLANT FACILTY PROFILE AND PLANT CONFIGURATION (EOP-011-2 R7.1)

Sim Gideon

256 Power Plant Road

Bastrop, Texas 78602

County: Bastrop

Year built: U1 1965, U2 1968, U3 1971

Capacity: About 555 megawatts

Fuel: Natural gas, traditional gas-fired thermal steam units

Owners: LCRA

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6.0 (PUCT 25.55 (E) and EOP-011-2 R7.3.2) LCRA evaluated . The reliability confidence levels account for Sim Gideon Power Plant Units 1,2,3 . Any change of Sim Gideon Power Plant Units 1,2,3 . Any change of Sim Gideon Power Plant Units 1,2,3 . Any change of **7.0 FUEL** Sim Gideon . Tol . The ability to source . Continued coordination

8.0 ENVIRONMENTAL CONSTRAINTS (EOP-011-2 R7.3.1.4)

. The ability to s
. Continued coordination with

comply with applicable environmental permits and with Texas Commission on Environmental Quality (TCEQ) rules during all modes of operation. TCEQ has authority to issue enforcement discretion for exceedances of emissions and operational limits of power generating facilities that exceed air permit limits. TCEQ enforcement discretion is given to assist during extreme conditions and energy emergency situations. ERCOT provides notice of TCEQ enforcement discretion to registered entities through market notices. TCEQ will also exercise enforcement

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discretion when the Governor issues a disaster declaration and suspends state agency rules that would impede necessary actions to cope with the disaster.

In the event of TCEQ enforcement discretion, no LCRA generation facility shall exceed environmental permits and/or rules unless approved by LCRA Generation Executive Management and any generation facility that expects to exceed its air permits during and event shall provide notice to TCEQ.

9.0 PRECAUTIONS

9.1 Once Salamanders and Tarps are in place, Operations needs to include these as inspections on their daily rounds.



10.0 PROCEDURE

10.1 Winter Weather Preparation

10.1.1 Automated PMs have been developed in the Maximo work management system to address the following:

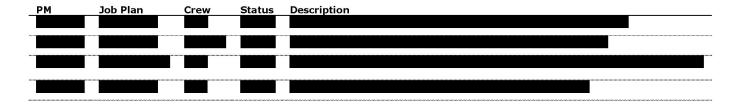


10.1.2 The job plans in the PMs detail the procedures and provide the required checklists associated with the individual tasks.

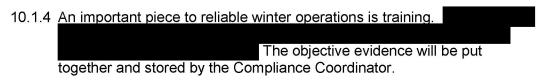
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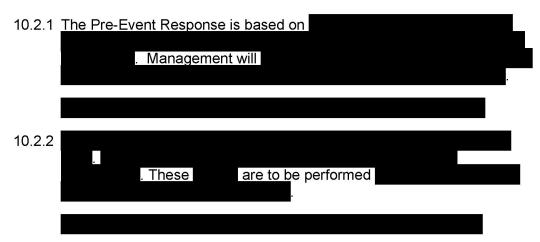


10.1.3 A Work Order will be auto generated at the specified time for each PM. The Craft Leads are responsible for the completion of the PM work orders. The Area Manager will also complete all checklists and submit items of concern or areas that require attention. Planning/Scheduling will write follow-up work orders to address the areas that require repair. The Compliance Coordinator will follow the whole process and store objective evidence.



10.1.5 When the Preparation phase is complete, the Compliance Coordinator will provide the SGP Director with a detailed summary of actions taken.

10.2 Event Response Alert Levels



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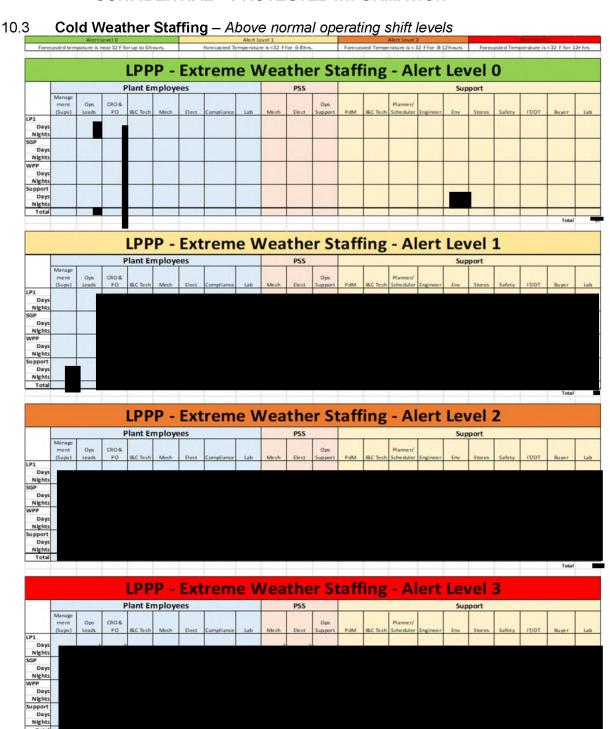
- 10.2.2.2 The Shift Lead will be responsible for ensuring that the designated checklist is completed. The plant personnel will notify the Shift Lead when c
- 10.2.2.3 All completed checklist will be turned into the Compliance Coordinator for review and storing as Objective Evidence.



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11.0 REGULATORY FILING OBLIGATIONS

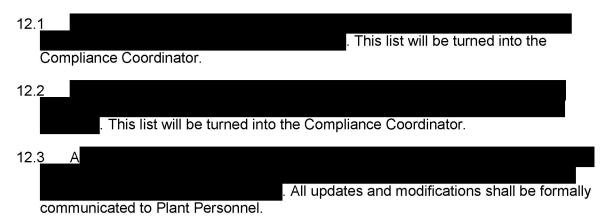
By December 1, LCRA must submit to the PUCT and ERCOT, on a form prescribed by ERCOT and developed in consultation with PUCT staff, a winter weather readiness report that describes all activities taken by LCRA to complete the requirements of PUCT 25.25 paragraph (1). This also includes a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over the generation entity, attesting to the completion of all activities described in PUCT 25.25 paragraph (1) and the accuracy and veracity of the information described in PUCT 25.25 subparagraph (2)(A).

A generation entity may submit a request for a good cause exception with the PUCT to specific requirements listed in PUCT 25.25 paragraph (1). The request must include a detailed explanation of the inability to comply with the specific requirements and detailed description and supporting documentation of efforts that have been made to comply with the rules. The request shall also include a plan with a schedule to comply with the specific requirement. The request shall include a notarized attestation sworn to by LCRA's highest-ranking representative, official, or officer with binding authority over LCRA attesting to the accuracy and veracity of the information.

Submitting the winter weather readiness report required by PUCT 25.25 exempts LCRA from the requirement in Section 3.21 (3) of the ERCOT Protocols, which requires generation entities to submit a Declaration of Completion of Generation Resource Winter Weather Preparations no earlier than November 1 and no later than December 1 of each year. Should LCRA not submit the winter weather readiness report required by PUCT 25.25, LCRA shall submit the declaration to ERCOT in accordance with Protocol 3.21 (3).

In accordance with ERCOT Protocol 3.21 (2), revisions to weatherization plans must be submitted to ERCOT by June 1 for any updates made updates made between November 1 and April 30, and by December 1 for any updates made between May 1 through October 31. Plans shall be submitted electronically.

12.0 EVENT/SEASON CONCLUSION



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GENERATION

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1.0

PROCEDURE: SGP-OPS-WTH-0100

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12.4 LCRA generation resources that
the generation entity must contract with a qualified professional engineer who is not an employee of the generation entity or its affiliate and who has not participated in previous assessments for the resource to
ERCOT must adopt rules that specify the circumstances for which this requirement applies and specify the scope and contents of the assessment. A generation entity to which this subsection applies may be subject to additional inspections by ERCOT. ERCOT must refer to the commission for enforcement any generation entity that violates this rule and fails to cure the identified deficiencies within a reasonable period of time.
12.5 LCRA shall file with the PUCT an affidavit from an owner, partner, officer, manager, or other official with responsibility for the power generation company's operations affirming that all relevant operating personnel are familiar with the contents of the emergency operations plan; and such personnel are committed to following the plan except to the extent deviations are appropriate under the circumstances during the course of an emergency.
COMMENTS/FEEDBACK

13.0

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14.0 REVISIONS

Revision Table			
Date	New Revision #	Description of Change	Revised By
11/16/2021	1.0	CREATION	JACQUELINE DINN

15.0 ANNUAL REVIEW SIGNATURE

Recoverable Signature

X Jeff Dyer

Jeff Dyer

LPPP Maintenance Supervisor
Signed by: Jeff Dyer

Recoverable Signature

X Jason von Minden

Jason von Minden LPPP Operations Supervisor Signed by: Jason von Minden

Recoverable Signature

X James N Willey

Jim Willey LPPP Plant Director Signed by: James N Willey