

ATTACHMENT 8: EXTREME COLD OR SEVERE WEATHER CHECKLIST

**ESCALATE AND REPORT KNOWN
CRITICAL EQUIPMENT DEFICIENCIES
IMMEDIATELY FOR ASSESSMENT**

Date performed	
Completed by (name)	

Extreme Cold or Severe Winter Weather Checklist

Instructions: Answer each item and provide completed checklist to Field Services Site Manager and Compliance Manager. Use blank lines to add items as needed

Item #	Item	Complete? Yes, No, or N/A	Notes Include any follow-up activity required.
1.	Review work order system to ensure adequate annual preventative work orders exist for freeze protection and winter weather preparations.		
2.	Perform necessary and immediate work needed to protect the facility.		
3.	Establish and document staff responsibilities to monitor weather and weather alerts.		
4.	Establish and document a communications plan with the TEMS Operating Personnel.		
5.	Ensure all critical equipment is operating and protected per the manufacturer's recommendations during extreme cold or severe winter weather events. Emphasize the points at the facility where freezing can occur (e.g. building piping, heat tracer piping).		
6.	Develop a list of critical equipment and transmitters that require increased surveillance during extreme cold or severe Winter weather events. Refer to Critical Equipment Matrix attachment.		
7.	Consider the effect of wind chill when applying freeze protection, including checking insulation thickness, quality, and proper installation.		
8.	Inspect building entrances, windows, fan louvers, and other openings for potential exposure of critical equipment to the elements.		
9.	Check equipment inventory and replenish all quantities. Refer to Winter Weather Equipment Inventory attachment. <u>Be sure to check all First Aid kits and confirm PPE "in use" dates.</u>		
10.			

Gambit Energy Storage LLC

Hurricane Annex

Revision 2.0

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1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Gambit Energy Storage LLC (Gambit) specific to the preparation for hurricane and tropical storm events, and post storm return to normal operations (as required) response. This annex shall be used in conjunction with the *Hot Weather Annex* and the *Cold Weather Annex*.

This annex addresses the requirements in §25.53 under *(d) Information to be included in the emergency operations plan*. Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Gambit Compliance Manager.

1.2 Applicability

This document applies to the power generating company registered with the PUCT as Gambit Energy Storage, LLC (PGC#20563)

1.3 Generation Resource Information

Gambit Energy Storage, LLC (Gambit or “Facility”), a 100 MW (at POI) Battery Energy Storage System (BESS) facility located in Brazoria County, Texas. Gambit commenced commercial operations on June 14th, 2021 and is interconnected to Texas-New Mexico Power Company at the 138 kV Angleton Substation, located in the Electric Reliability Council of Texas (ERCOT) footprint. Tesla Energy Management Systems LLC (TEMS) is the registered Generator Operator (GOP) and Tesla Energy Operations Inc is the operations and maintenance (O&M) provider for the Gambit Facility. The facility is normally un-manned with Field Services personnel assigned for routine checks and maintenance.

B. ROLES AND RESPONSIBILITIES

1.4 Gambit Compliance Manager

1.4.1 Role – The Gambit compliance manager and owner of this plan.

1.4.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.
- Ensure the EOP is up-to-date and aligns with Gambit’s business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.

- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Reviews and approves this Plan annually.
- Maintains evidence.

1.5 Gambit Field Services Site Manager

1.5.1 Role – the manager of the team contracted to perform the O&M services at the Gambit Facility.

1.5.2 Responsibilities include:

- Ensure the processes documented in the EOP are followed by all site personnel.
- Lead Field Services in the execution of the EOP and set expectations for safe and reliability operational performance of the facility.
- Provide annual written affirmation to the Compliance Manager that pre-hurricane season review activities have been complete.
- Oversee the day-to-day operations of the Gambit facility.
- Ensure the execution of weatherization tasks, procurement of inventory, completion of checklists, and overall preparation and readiness for hurricane season operations is performed within the timeframes required.
- Document remediation activities in the work management system that are required to address hurricane preparation needs or deficiencies.
- Notify the Compliance Manager of hurricane preparation tasks progress, scheduling, or concerns with meeting deadlines.
- Participate in the development, administration, execution, and update of the EOP.
- Ensure annual drill requirements are met and submit evidence to Gambit Compliance Manager upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Gambit upon completion and by the end of each calendar year.

1.6 Tesla Energy Operations Inc Field Services (Field Services)

1.6.1 Role – Contracted to perform the O&M services at the Gambit Facility.

1.6.2 Responsibilities include:

- Follow the requirements and processes documented in the Plan.
- Conduct facility readiness reviews and provide reports to Field Services Site Manager and Compliance Manager upon completion and request.
- Coordinate with and report facility weather-related information to Field Services Site Manager and TEMS Operating Personnel.

- Identify potential risk areas during hurricane conditions and report opportunities to improve readiness and response to the Field Services Site Manager.
- Participate in hurricane evaluations, training and drills to assess the effectiveness of this plan and provide feedback.

1.7 Tesla Energy Management Systems LLC (TEMS) (CC Operator)

1.7.1 Role – The registered Generator Operator (GOP) for the Gambit facility

1.7.2 Responsibilities include:

- Operates the Gambit site from the TEMS operations center in Fremont, Ca.
- Communicate with QSE and other entities, as appropriate, of weather conditions leading to a Gambit outage, shutdown, curtailment or needed discharging/charging of site.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Submit evidence to Compliance Manager upon completion and request.
- Participate in training and drills as requested.
- Participate in post-incident reviews as requested.

2.0 LOCAL CONDITIONS

2.1 Local Conditions

Angleton, TX is used for comparison of the local Facility conditions. Gambit is located in Angleton approximately 19 miles from the Gulf of Mexico and sits at approximately 27 feet Above Sea Level (ASL). Three major hurricanes (Carla in 1961, Alicia in 1983 and Rita in 2003) have tracked within 75 miles of the Gambit facility since 1950. Many other major storms have impacted the area in the last 70 years. Gambit is approximately 10 miles east of the Brazos River and two miles east of Oyster Creek, both waterways are at approximately 1 foot ASL and are separated from Gambit through a levee system. Gambit is located within a 0.2% Annual Chance Flood Hazzard zone. All slabs for battery-packs are located at 29 feet ASL and all vault rims are at 29'3" ASL. There is 1.42 acre-feet of detention pond storage capacity on the site.

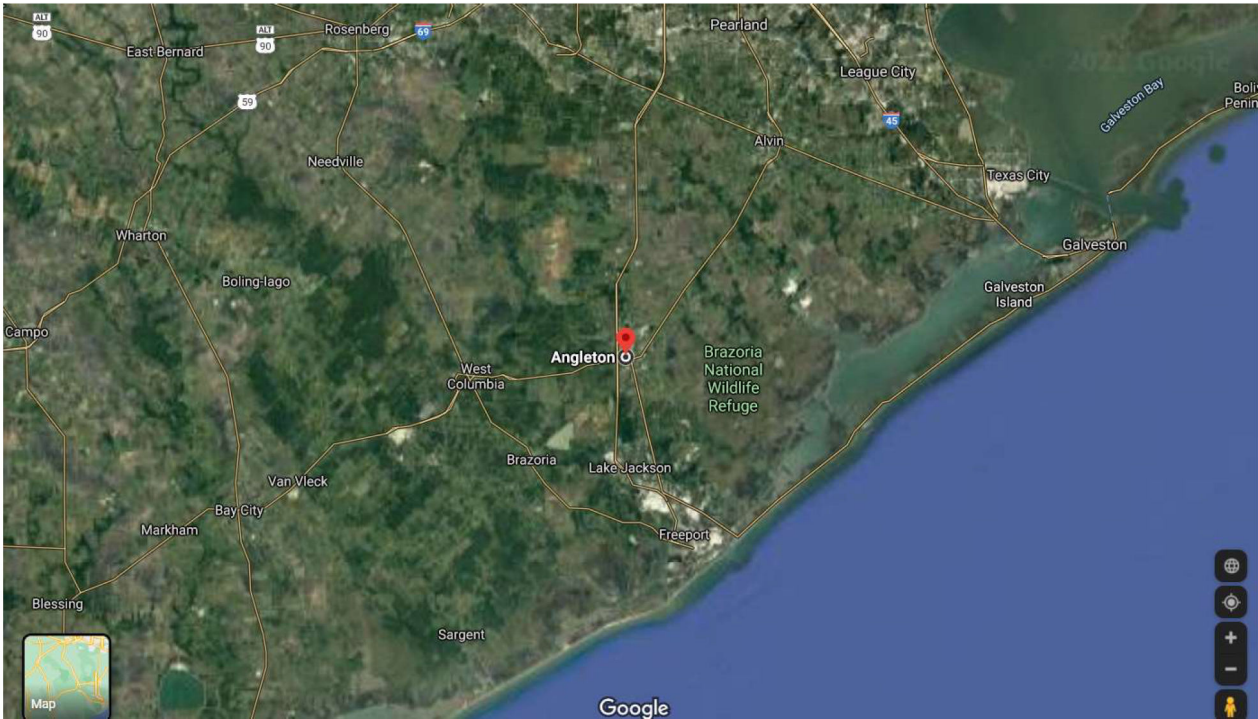


Figure 1: Location of Gambit Facility

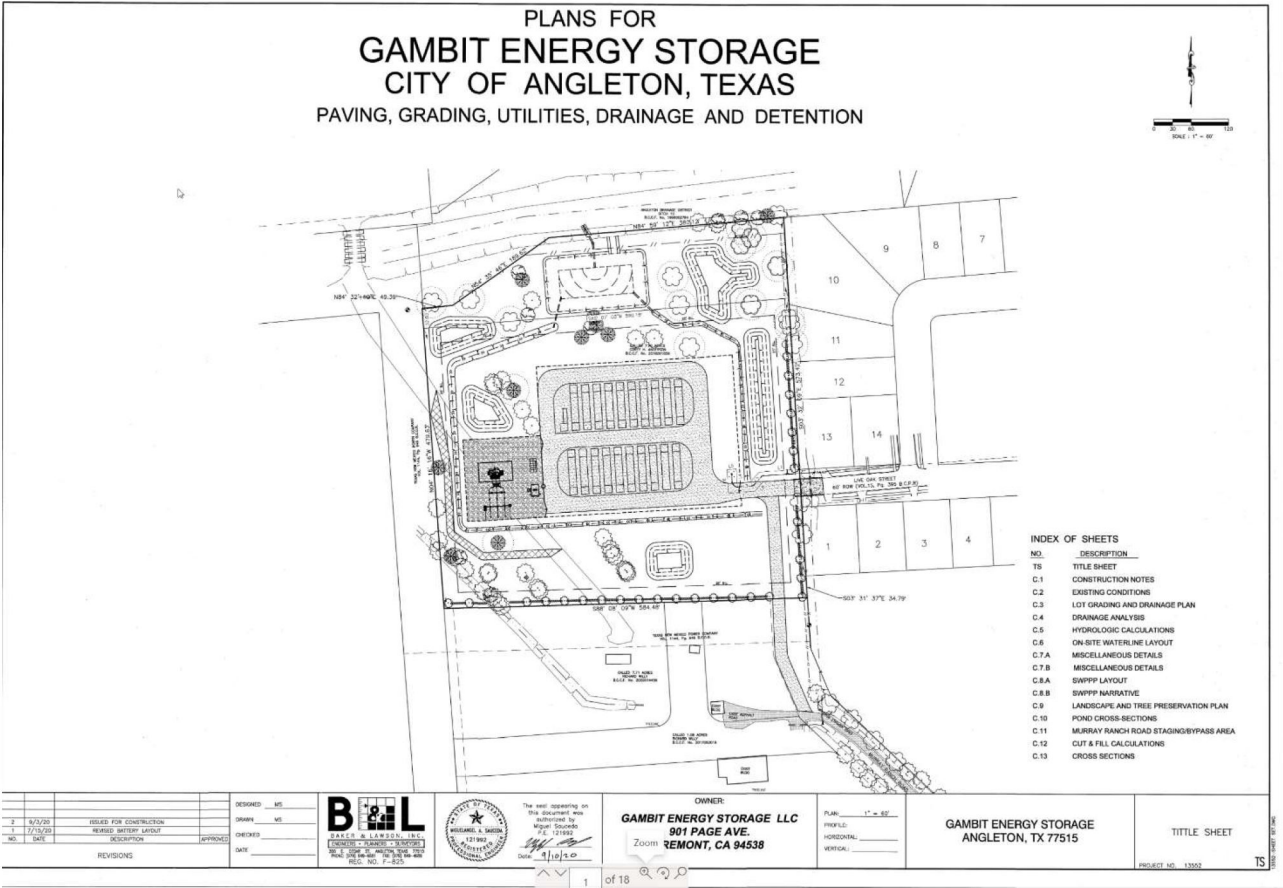


Figure 2: Gambit Site Plan

3.0 HURRICANE AND TROPICAL STORM PREPARATIONS AND REVIEW

3.1 Pre-Hurricane Season Checks

The Atlantic Hurricane Season runs from **June 1** to **November 30** of each calendar year, Field Services will utilize the Hot Weather Annex to complete all pre-season checks, which includes items related to hurricane preparedness.

3.2 Pre-Event Checks

Field Services will complete the *Hurricane Pre-Event Checklist* upon issuance of any watch by the National Hurricane Center for Tropical Storm or Hurricanes which has the potential to impact the Gambit facility.

As part of its preparation, Field Services personnel will utilize its **Critical Equipment Matrix** as found in the *Emergency Operations Plan* to evaluate areas of vulnerability from heavy rain, lightning, flooding and high wind conditions at the facility.

3.3 Post-Event Checklist

Following a hurricane or tropical storm, Field Services personnel will complete the *Hurricane and Tropical Storm Post-Event Checklist*.

4.0 EQUIPMENT DESIGN PARAMETERS AND WEATHER DESIGN LIMITS

The Gambit facility has a design maximum ambient temperature (maximum operating temperature) of 140 degrees Fahrenheit (temperature >122 degrees Fahrenheit results in equipment derations) and a design minimum ambient temperature (minimum operating temperature) of -22 degrees Fahrenheit.

Field Services personnel will utilize, as part of the implementation of this plan, manufacturers recommendations to determine at what ambient temperature the facility and any critical equipment will be able to operate.

5.0 HURRICANE AND TROPICAL STORM COMMUNICATIONS

5.1 Communication Protocols

- 5.1.1 The Field Services Site Manager will communicate all hurricane and tropical storm preparation and response activities to the Compliance Manager.
- 5.1.2 Before anticipated hurricane or tropical storm events, the Field Services Site Manager will:
 - 5.1.2.1 Communicate with Gambit Field Services and CC Operator that the site-specific hurricane preparation procedures, checklists, and reviews have been completed.
 - 5.1.2.2 Communicate with all personnel about changing conditions and potential areas of concern to heighten awareness around safe and reliable operations.
- 5.1.3 Field Services personnel will notify CC Operator (who is required to notify the QSE and other entities) of instances of weather conditions leading to a plant outage, shutdown, or curtailment.

- 5.1.4 The Field Services Site Manager will conduct job safety briefings prior to hurricane and tropical storm events which will include the availability of interpersonal communication capability and available back-up communications options. To that end, Field Services personnel will identify and verify the operations of all back-up communications options in case the primary system is not available.

6.0 GAMBIT EVACUATION ROUTES

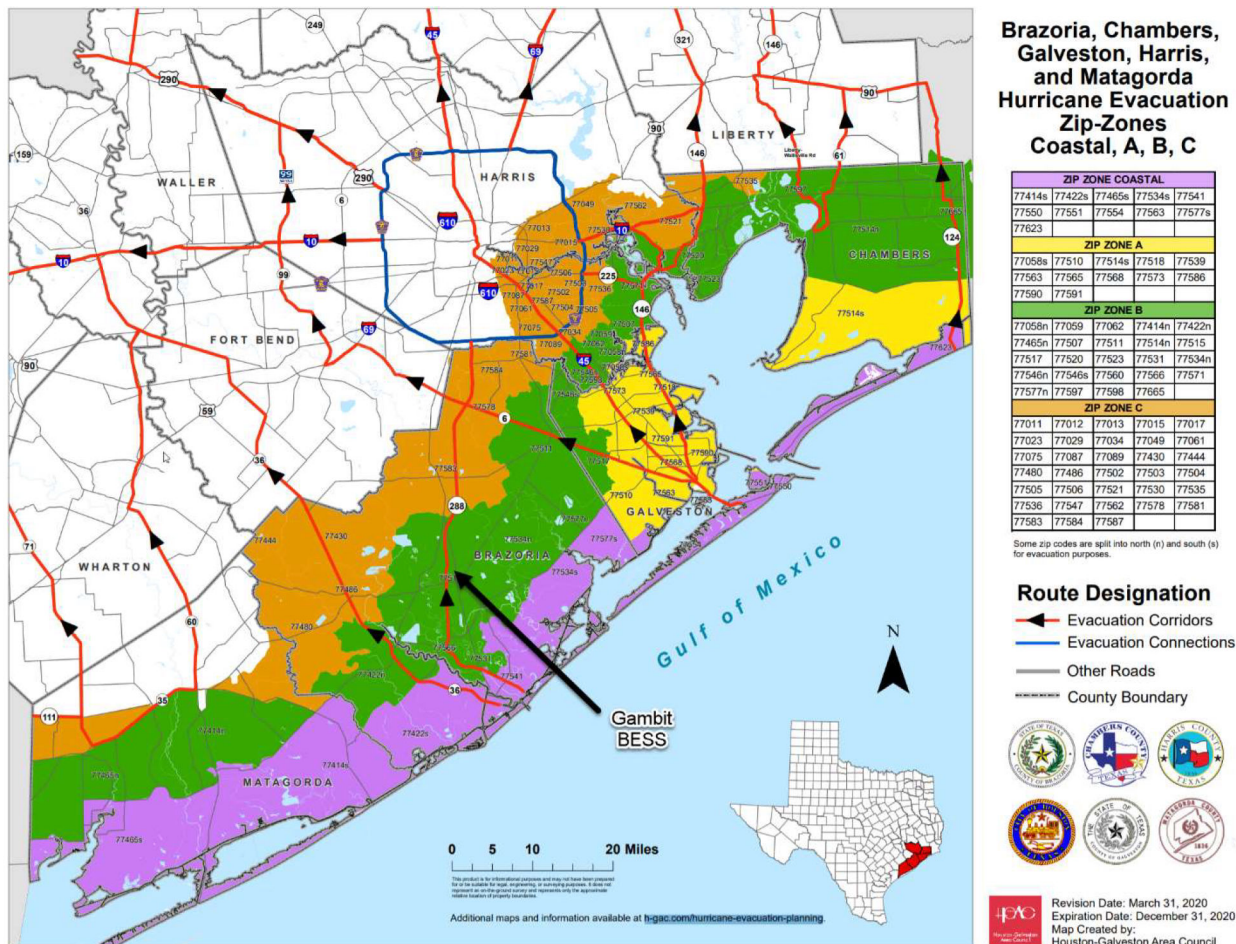


Figure 3: Gambit Facility and Evacuation Routes

6.1 Evacuation Notification

The Brazoria County Judge determines the need for large-scale evacuations, such as would be required during a hurricane.¹ Evacuation orders will be disseminated by local media and law enforcement. Upon issuance of an evacuation order, personnel at the Gambit facility should immediately notify Field Services management to begin evacuation planning and evaluate the identified evacuation routes as indicated above. A determination of the most expeditious evacuation route available should be made. Personnel should consult available smartphone traffic applications and local news sources in determining evacuation route suitability.

6.2 Notification to TEMS of Evacuation Notification

Upon notification of an evacuation order or Field Services management decision to evacuate as a precaution, Field Services personnel notify the TEMS Control Center of the order/decision. Notification should include details around nature of the threat, time of departure, evacuation route to be utilized and alternative contact means (personal cell phones, etc.) as necessary.

¹ Annex E, Evacuation, Brazoria County and Joint Resolution Cities
<https://www.brazoriacountytx.gov/home/showpublisheddocument?id=10760>
 Gambit Hurricane Plan

6.3 Determination To Remain Energized Or Deenergize The Facility

Upon notification to the TEMS Control Center of an evacuation order, Field Services personnel will request the TEMS CC operator to verify with Texas New Mexico Project (TNMP) Transmission Operator (TOP) as to whether Gambit should remain energized.

Upon TNMP determination to remain energized, Field Services personnel shall perform any remaining checks prior to leaving the facility.

Upon TNMP determination to de-energize the facility, Field Services personnel shall assist TEMS in the de-energization and placement of the facility in a safe position, establishing clearances as required.

7.0 FACILITY RE-ENTRY POST STORM

7.1 Re-entry Procedure

Upon receipt of an all-clear announcement from local officials, designated Field Services personnel should proceed from their evacuation locations to the Gambit facility.

Prior to re-entry to Gambit, Field Services will contact the TEMS Operator for a facility status update. Information regarding status of the Gambit facility, status of the Angleton Substation and any other site information the TEMS Operator may be aware of through telemetry, standing alarms, video feeds or other means.

Re-entry will be accomplished with at least two Field Services personnel for safety reasons. Constant communication with the TEMS Operator or other off-site Field Services personnel will be established. Lone worker is not authorized.

The Gambit BESS facility consists of two perimeters. An internal perimeter containing all the BESS equipment, medium voltage and high voltage switchgear surrounded by an 8-foot concrete block wall with one entry gate and an outer perimeter with retention ponds and landscaping contained within chain-link fencing with one entry gate.

Prior to re-entry to Gambit, Field Services will do a visual inspection of the facility from the outer gate and perimeter fence, observing for post-storm hazards such as downed trees, washed away berms, standing water and any other hazards that may impede entry into the facility.

Once established that it is safe to proceed from the main entry gate, a visual inspection of the Gambit BESS facilities should be made from outside the Gambit BESS main gate for storm damage that may make entry hazardous. When determined safe to proceed, the facility should be entered and the Re-Entry checklist performed.

Due to the stored energy nature of a BESS facility, extreme caution should be used when reentering the facility. If found in a state believed to be de-energized all equipment must be verified as de-energized prior to approaching the equipment. Voltage detection equipment must be used to verify equipment is de-energized.

The Field Services Site Manager will consider the need for enhanced staffing at the facility (including on a 24x7 basis) during recovery from severe weather events. Planning for this staffing should include arrangements for transportation, lodging/meals, and in-house food inventories, as appropriate.

8.0 ANNUAL TRAINING AND PLAN REVIEW

The PUCT requires that all relevant personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Annual training and review as part of the *Hot Weather Annex* training and review will be conducted on hurricane and tropical storm topics to support readiness for executing and implementing this annex. Review will use this document and may include the following topics:

- Identification of the checks required on critical facility components and equipment most affected by storm conditions.
- A review of personnel health and safety precautions.
- A review of possible site-specific weather-related concerns.
- Evacuation planning.
- Procedures for troubleshooting, inspections, and repairs.
- ERCOT extended severe weather outlook if available.

At the end of each calendar year, the Site Manager will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and
2. Dates of access to or training on the EOP, as appropriate.

9.0 RESOURCES AND RELATED DOCUMENTS

Gambit Emergency Operations Plan

Gambit Hot Weather Annex

Gambit Cold Weather Annex

Gambit Pandemic and Epidemic Annex

Gambit Cyber and Physical Security Incident Annex

ERCOT

Current Protocols - Nodal: <http://www.ercot.com/mktrules/nprotocols/current>

- Section 3: Management Activities for the ERCOT System

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

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

Subchapter C, §25.53 - Electric Service Emergency Operations Plans

Brazoria County

Annex E, Evacuation, Brazoria County and Joint Resolution Cities

<https://www.brazoriacountytx.gov/home/showpublisheddocument?id=10760>

10.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

DOCUMENT OWNERS

Title	Name
Sr. Project Manager, Industrial Storage	Paul Spracklen
Commercial Field Manager	Paul Spracklen
Territory Manager	Keith Merkel

DISTRIBUTION LIST

Title	Name
Tesla Microgrids, Sr. Project Manager	Michael Grabstein
Sr. Project Manager, Industrial Storage	Paul Spracklen
Commercial Field Manager	Paul Spracklen
Territory Manager	Keith Merkel

APPROVALS

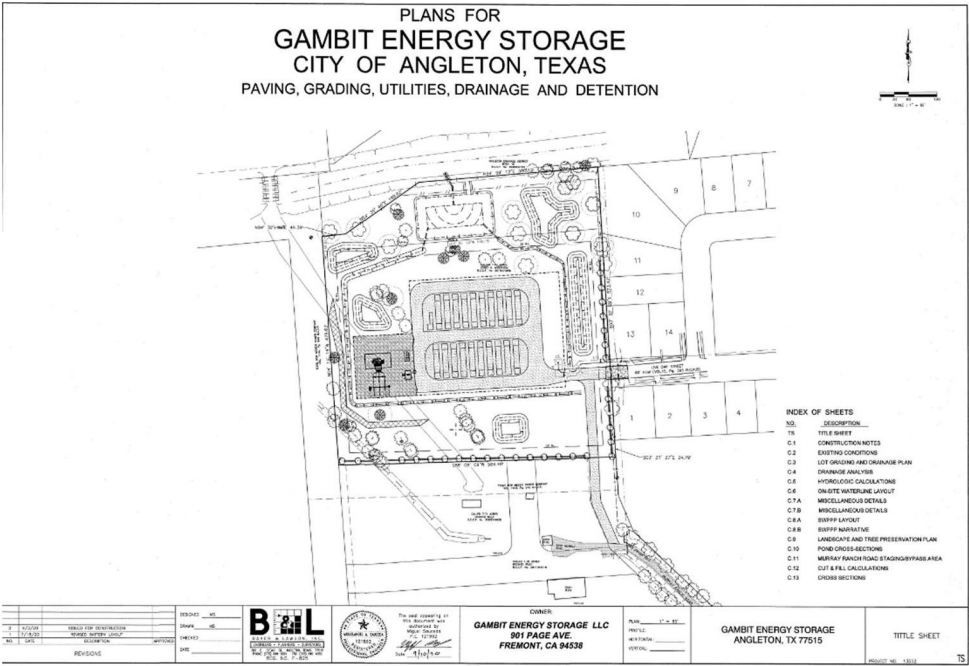
The approval signatures in this section indicate review of the document and approval to publish.

Name	Date	Signature
Paul Spracklen	4/13/2022	<i>Paul Spracklen</i>

VERSION HISTORY

Version	Effective Date	Author	Description of Changes
1.0	5/31/2021	GridSME, Gambit, Tesla Energy Operations Inc (O&M)	New plan
2.0	4/1/2022	GridSME, Gambit, Tesla Energy Operations Inc (O&M)	Update of plan for PUCT Rule 25:53 changes in 2022

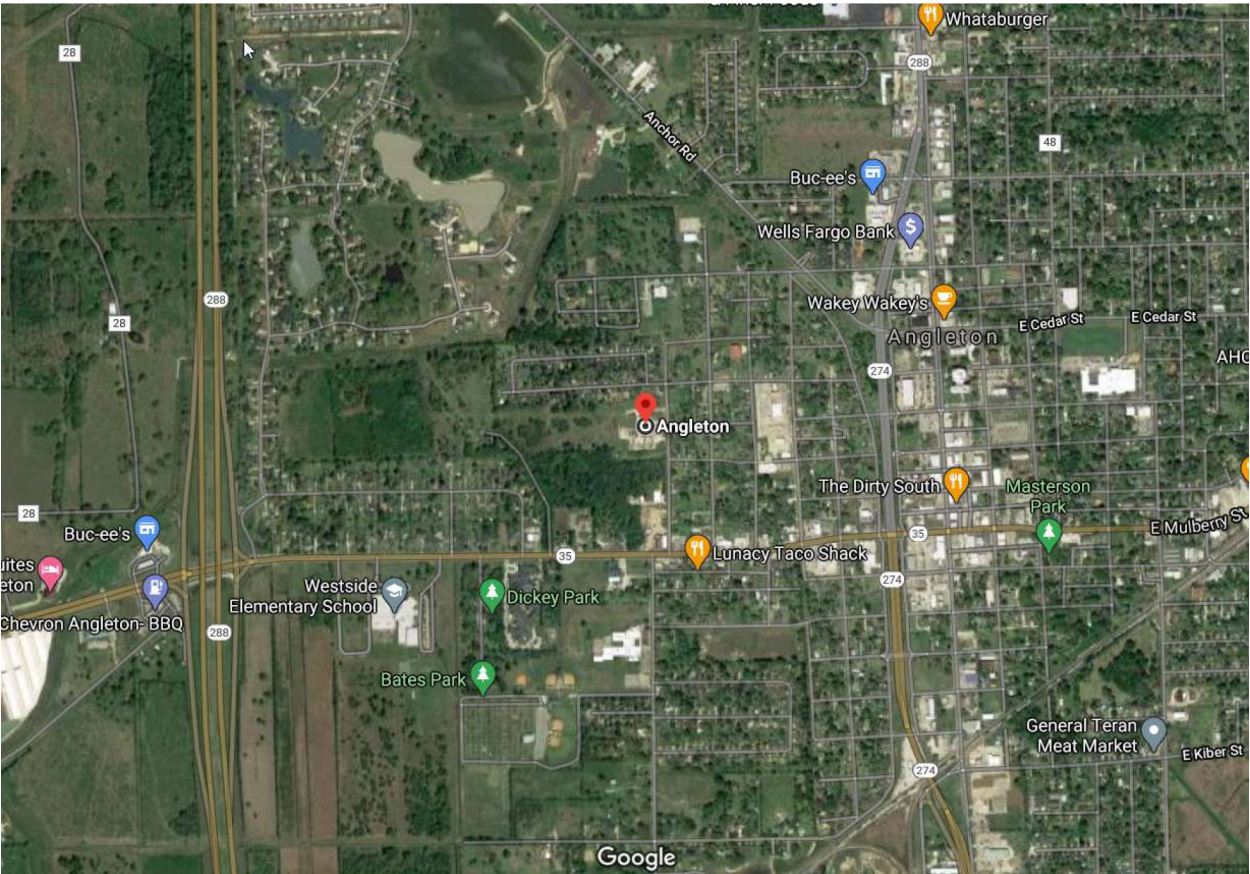
ATTACHMENT 1: GAMBIT SITE MAP



GAMBIT BESS PROJECT
ANGLETON, TEXAS
29°10'04.7"N 95°26'40.9"W



ATTACHMENT 2: GAMBIT LOCATION MAP



ATTACHMENT 3: Hurricane and Tropical Storm Pre-Event Checklist

Date performed	
Completed by (name)	

Pre-Event Checks	
Instructions: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manager. Use blank lines to add items as needed.	
<input type="checkbox"/>	Monitor weather and weather alerts. Note in plant logs when Hurricane or Tropical Storm watch has been issued, and subsequently recalled or released.
<input type="checkbox"/>	Notify CC Operator of storm notification and relevant information.
<input type="checkbox"/>	Review evacuation routes regardless of evacuation probability.
<input type="checkbox"/>	Place severe weather protections in service where weather could adversely impact personnel, operations, or forced outage recovery (including severe thunderstorms, damaging winds or flooding).
<input type="checkbox"/>	Verify all facility drainage infrastructure is intact and free of obstructions.
<input type="checkbox"/>	Verify all access gates closed and with intact working locks.
<input type="checkbox"/>	Check all facility building and cabinet doors (transformer, circuit breakers, mega-packs, etc.) shut and locked if applicable.
<input type="checkbox"/>	Check site for loose or unsecured equipment including spare parts, tools, rubbish bins, temporarily stored items. Move all spill kits to storage.
<input type="checkbox"/>	Verify all phone, radio and other communication systems operational with batteries fully charged.
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	

ATTACHMENT 4: Hurricane and Tropical Storm Post-Event Checklist

Date performed	
Completed by (name)	

Hurricane and Tropical Storm Post-Event Review Checklist	
Instructions: Check each item when complete and provide completed checklist to Field Services Site Manager and Compliance Manger. Use blank lines to add items as needed.	
<input type="checkbox"/>	Communicate with CC Operator on status of facility (energized/de-energized, alarms, etc.) and status of Angleton Substation (energized/deenergized, hot line from Gambit to Angleton, etc.)
<input type="checkbox"/>	Verify outer perimeter safe to enter through visual inspection.
<input type="checkbox"/>	Note any hazardous situations that need immediate remediation within the outer perimeter, place warning signs/tape as necessary to alert others to hazard.
<input type="checkbox"/>	Note any missing/damaged security fencing for the outer perimeter, secure if possible.
<input type="checkbox"/>	Verify Gambit BESS Facility safe to enter through visual inspection.
<input type="checkbox"/>	Verify the Energize/De-energize status of all Gambit BESS Facility equipment. Establish electrical clearances as appropriate for the situation.
<input type="checkbox"/>	Note any hazardous situations that need immediate remediation within the inner perimeter, place warning signs/tape as necessary to alert others to hazard.
<input type="checkbox"/>	Visually verify the integrity of all Megapacks. Note any items needing immediate attention (cabinet damage, damaged closures, etc.)
<input type="checkbox"/>	Visually verify the integrity of all medium and high voltage substation equipment.
<input type="checkbox"/>	Document all discrepancies noted and create work orders as necessary to address damage to the facility.
<input type="checkbox"/>	Identify any lessons learned or procedural improvements to include in this Gambit Hurricane Plan, including any updates to this readiness timeline or extreme heat or severe summer weather preparedness checklist.

Gambit Energy Storage LLC

Cyber and Physical Security Annex

Revision 2.0

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1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This annex provides guidance and direction to Gambit Energy Storage LLC (Gambit) specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents.

This annex addresses the requirements in §25.53 under *(d) Information to be included in the emergency operations plan*. Within this annex and all other EOP documents, the use of “EOP” refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Gambit Compliance Manager.

1.2 Applicability

This document applies to the power generating company registered with the PUCT as Gambit Energy Storage, LLC (PGC#20563).

1.3 Generation Resource Information

Gambit Energy Storage, LLC (Gambit or “Facility”), a 100 MW (at POI) Battery Energy Storage System (BESS) facility located in Brazoria County, Texas. Gambit commenced commercial operations on June 14th of 2021 and is interconnected to Texas-New Mexico Power Company at the 138 kV Angleton Substation, located in the Electric Reliability Council of Texas (ERCOT) footprint. Tesla Energy Management Systems LLC (TEMS) is the registered Generator Operator (GOP) and Tesla Energy Operations Inc is the operations and maintenance (O&M) provider for the Gambit Facility. The facility is normally un-manned with Field Services personnel assigned for routine checks and maintenance.

B. Roles and Responsibilities

1.4 Gambit Compliance Manager

1.4.1 Role – The Gambit compliance manager and owner of the EOP.

1.4.2 Responsibilities include:

- Ensure completion of all required reporting (ERCOT, PUCT, etc.) within the specified timeframes.
- Oversee revisions and updates to the EOP as necessary, as well as the implementation of the revised EOP, and a review of supporting documents, as needed.

- Ensure the EOP is up-to-date and aligns with Gambit’s business objectives and addresses requirements. The PUCT requires that the EOP and all supporting documents is continuously maintained.
- Participate in training and drills, as appropriate.
- Participate in post-incident reviews and direct the updating of appropriate documentation and processes, as needed.
- Ensure the activities documented in this annex are completed, in concert with the Site Manager.
- Reviews and approves this annex annually
- Maintains evidence.

1.5 Tesla Energy Operations Inc Field Services Site Manager

1.5.1 Role – the manager of the team contracted to perform the O&M services at the Gambit Facility.

1.5.2 Responsibilities include:

- Ensure the requirements and processes laid out in the EOP are followed by site Personnel.
- Lead Field Services in the execution of the EOP and set expectations for the safe and reliable operational performance of the Facility.
- Oversee the day-to-day operation of the Gambit facility.
- Participate in the development and update of the EOP, under the leadership of the Compliance Manager.
- Ensure annual drill requirements are met and submit evidence to Gambit upon completion and request.
- Schedule training and drills for relevant operating personnel, keep records of training and drills, and provide to the Compliance Manager.
- Ensure EOP training is completed by all relevant operating personnel and submit evidence to Gambit upon completion and by the end of each calendar year.
- Assist in evaluation and escalation of potential incidents.
- Provide evidence to Gambit Compliance Manager upon completion and request.

1.6 Tesla Energy Operations Inc Field Services (Field Services)

1.6.1 Role – Contracted to perform the O&M services at the Gambit Facility.

1.6.2 Responsibilities include:

- Follow the requirements and processes documented in the EOP.

- Provide feedback on potential impact(s) to operations of an incident and proposed responses.
- Participate in responses to emergency events at the Gambit facility.
- Assist in evaluation and escalation of potential incidents.
- Participate in training, and drills, and post-incident reviews as requested.

1.7 Tesla Energy Management Systems, LLC (TEMS) Operating Personnel

1.7.1 Role – The registered Generator Operator (GOP) for the Gambit facility.

1.7.2 Responsibilities include:

- Operates the Gambit site from the OP Name operations center in City, State.
- Report to the Reliability Coordinator, QSE, and other identified entities, as necessary.
- Coordinate with Field Personnel and create appropriate log entries for events, incidents, etc.
- Assist in evaluation and escalation of potential incidents.
- Monitor SCADA, alerts, and communications from Field Services personnel, and security cameras (when present), for suspected Reportable Events.
- Submit evidence to Gambit Compliance Manager upon completion and request.
- Participate in training, and drills, and post-incident reviews as requested.

2.0 INCIDENT IDENTIFICATION

2.1 Threats to the Facility

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

Actions by the person receiving the threat:

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

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

1. Order an evacuation of the facility.

2. Call 911 for Police or Fire Assistance.

[REDACTED]

[REDACTED]

[REDACTED]

2.2 Identification of Abnormal Conditions and Potential Indicators of a Cyber Security or Physical Security Incident

The first person to become aware of an abnormal condition will report to their appropriate internal contact (e.g., site manager, IT, etc.) for review, identification, and for determining if the incident warrants escalation.

The primary activities in the incident identification phase are the following:

1. Review events, alarms, and indicators of compromise;
2. Gather evidence, interview involved parties (if needed); and
3. Analyze information gathered to determine if an incident has occurred, and if further evaluation is needed.

It is important to be aware that seemingly unrelated cyber and physical events may be related; be cautious to not draw conclusions before analysis and communications have been conducted.

The information below is intended to provide guidance for determining if an incident warrants further evaluation.

A. Physical indicators of a potential Cyber Security or Physical Security Incident

- 2.2.1 Indicators include, but are not limited to:

[REDACTED]

B. Cyber indicators of a potential Cyber Security Incident

- 2.2.2 Indicators include, but are not limited to:

[REDACTED]



3.0 INCIDENT ESCALATION, INVESTIGATION AND REPORTING

3.1 Escalation

Upon receipt of notification from Field Services or Operating Personnel, the Compliance Manager and notifying personnel will coordinate the investigation and reporting of the suspected incident to the appropriate stakeholders in the reporting process.

3.2 Investigation

The Compliance Manager, along with subject matter experts, Operating Personnel, Field Services, and other support staff, will ensure that the potential event is investigated and reported within all required timelines (e.g. NERC, ERCOT, Federal).

3.3 Reporting

3.3.1 In coordination with Operating Personnel and subject matter experts, the Compliance Manager or their designee will determine if there any reporting is required for the incident.

3.3.1.1 Personnel involved in the response to an incident will be notified by the Compliance Manger or their designee of any submittals that were made.

3.3.2 Operating Personnel will notify and coordinate with Field Technician until the end of the Reportable Event.

3.3.3 If the event is determined to not meet the reporting threshold, Operating Personnel will coordinate the collection of all appropriate evidence with Field Technician and submit to Gambit for evidence retention.

3.3.4 If it is determined that a Reportable Cyber Security Incident has occurred or is ongoing, the incident must be reported to the NERC Electricity Information Sharing and Analysis Center (E-ISAC) and other entities, as required.

3.3.5 If it is determined that a Reportable physical Event has occurred or is ongoing, it must be reported to the Department of Energy and other entities, as required.

4.0 RESOURCES AND RELATED DOCUMENTS

Gambit Emergency Operations Plan

Gambit Cyber Security Incident Response Plan

Gambit Event Reporting Operating Plan

Department of Energy (DOE)

Office of Cybersecurity, Energy Security & Emergency Response web page:

<https://www.oel.doe.gov/oe417.aspx>

- DOE-417 Online Submissions and DOE-417 Form and Instructions are located on this web page.
- The Online Submissions link allows a user to include NERC System Awareness and the E-ISAC on the submittal; if the user has a login account, they can include additional recipients as well as retrieve and update past forms.

NERC

<https://www.nerc.com/pa/rrm/bpsa/Pages/default.aspx>

ERCOT

Current Protocols - Nodal: <https://www.ercot.com/mktrules/nprotocols/current>

- **Section 16: Registration and Qualification of Market Participants**
- **Section 23 Form E, Notice of Change of Information:**
- **Section 23 Form O, Notice of Cybersecurity Incident**

Current Nodal Operating Guides: <https://www.ercot.com/mktrules/guides/noperating/current>

- **Section 3: ERCOT and Market Participant Responsibilities**

Texas RE

Texas RE Event Analysis webpage: <https://www.texasre.org/reliabilityservices>

- See “Event Contact Information” section under Event Analysis

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

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

- Subchapter C, §25.53 - Electric Service Emergency Operations Plans

Emergency Contact Update Form (posted under Emergency Management section):

<https://www.puc.texas.gov/industry/electric/forms/>

5.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity’s EOP or a portion of an entity’s EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

DOCUMENT OWNERS

Title	Name
Sr. Project Manager, Industrial Storage	Paul Spracklen
Commercial Field Manager	Paul Spracklen
Territory Manager	Keith Merkel

DISTRIBUTION LIST

Title	Name
Tesla Microgrids, Sr. Project Manager	Michael Grabstein
Sr. Project Manager, Industrial Storage	Paul Spracklen
Commercial Field Manager	Paul Spracklen
Territory Manager	Keith Merkel

APPROVALS

The approval signatures in this section indicate review of the document and approval to publish. With the approvals below, this version supersedes all previous versions.

Name	Date	Signature
Paul Spracklen	4/13/2022	<i>Paul B Spracklen</i>

REVISION CONTROL SUMMARY

Version	Effective Date	Author	Description of Changes
1.0		GridSME, Gambit Energy Storage LLC	New document
2.0	4/1/2022	GridSME, Gambit, Tesla Energy Operations Inc (O&M)	Update of plan for PUCT Rule 25:53 changes in 2022