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PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53	§ § § §	**PUBLIC UTILITY COMMISSION OF TEXAS**

BOBCAT BLUFF WIND PROJECT, LLC'S EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, Bobcat Bluff Wind Project, LLC ("Bobcat Bluff Wind") hereby files an executive summary of its emergency operations plan known as the Emergency Preparedness and Response Plan (the "Plan"), which describes the contents and policies contained in the Plan, includes references to specific sections and page numbers of the Plan that correspond with the requirements of 16 TAC § 25.53, includes the Plan's record of distribution, and attaches the required affidavit and a redacted copy of the Plan and supporting documents. Bobcat Bluff Wind is a registered power generation company and a wholly owned subsidiary of EDF Renewables, Inc. The Plan is an omnibus plan of EDF Renewables, Inc. with appropriate Texas- and site-specific information incorporated.

A. Contents and Policies (16 TAC § 25.53(c)(1)(A)(i)(I))

Attachment A to this Executive Summary is a redacted copy of Bobcat Bluff Wind's Emergency Preparedness and Response Plan. The purpose of the Plan is to assist employees, sub-contractors, contractors, suppliers, and management in making quality decisions during times of crisis. The Plan contains guidance in determining the appropriate actions to be undertaken to prevent injury and property loss, minimize hazards to human health and safety and to the environment from fire, explosion, or any unexpected release of hazardous materials to the air, soil, surface or groundwater, and natural or human disasters. The Plan acts as a guideline in the event of an emergency. Every possible version of every imaginable scenario can never be captured in a usable document. The steps described may not occur in the same order, every time, but the Plan provides baseline directions on the most common steps necessary to address each situation listed.

The Plan contains the following sections:

B. Record of Distribution (16 TAC §§ 25.53(c)(1)(A)(i)(III) and 25.53(c)(4)(A))

As described in Policy Section 2, Page 4 of the Plan, a copy of the Plan is provided to all employees upon hire and after any changes in site/facility operations or layout. Additionally, hard copies of the Plan are kept in a prominent location near the facility's main entrance. The Plan is stored in a red binder that is not similar to other binders utilized at the site, which allows ready identification by any personnel on site.

As described in Policy Section 3, Page 4 of the Plan, all on-site employees upon hiring and after any changes in site/facility operations or layout are also trained on the Plan. And to ensure the Plan is adapted to meet current site conditions, the Plan is tested on a regular basis (not less than once per calendar year) by the site manager as described in Policy Section 4, Page 5 of the Plan.

Bobcat Bluff is in the process of compiling a Record of Distribution table in accordance with 16 TAC §§ 25.53(c)(4)(A) and 25.53(c)(1)(A)(i)(III) and will supplement at a later date.

C. Affidavit (16 TAC §§ 25.53(c)(1)(A)(i)(IV) and 25.53(c)(4)(C))

Attachment B to this Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

D. Emergency Contact List (16 TAC § 25.53(c)(4)(B))

Attachment C to the Executive Summary is the Plan's emergency contact list required by 16 TAC § 25.53(c)(4)(B).

The primary and backup emergency contact for Bobcat Bluff Wind who can immediately address urgent requests and questions from the Commission during an emergency are identified on Attachment C and will be made available to Commission Staff upon request.

E. Common Operational Functions Relevant Across Emergency Types (16 TAC § 25.53(d))

In addition to those items explicitly listed in 16 TAC § 25.53, the Plan addresses common operational functions relevant across emergency types, including:

Content/Policies	Plan Reference
Purpose	Page 2
Scope	Page 2
Roles and Responsibilities	Pages 2-3
Definitions	Page 3
Legal Requirements	Policy Section 1, Page 4
Plan Distribution	Policy Section 2, Page 4
Training	Policy Section 3, Page 4
Drills and Exercises	Policy Section 4, Page 5
Emergency Communications	Policy Section 5, Pages 5-6
Emergency Supplies	Policy Section 12, Page 19
Emergency Staffing	Policy Section 13, Page 19
Media	Policy Section 14, Page 19

F. Approval and Implementation (16 TAC § 25.53(d)(1))

Content/Policies	Plan Reference	Rule Reference
Introduction of Plan and outline of its applicability	Page 2	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the Plan, and those who can change the Plan	Roles and Responsibilities Section 1, Page 2 Roles and Responsibilities Section 4, Pages 2-3 Policy Section 2, Page 4 Policy Section 3, Page 4 Policy Section 4, Page 5	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change made to the Plan since the initial Plan was adopted, including the changes made to conform to the new 16 TAC § 25.53 adopted on February 25, 2022	Document History Section, Page 20	16 TAC § 25.53(d)(1)(C)
Dated statement that the current Plan supersedes previous plans	Scope Section, Page 2	16 TAC § 25.53(d)(1)(D)

Content/Policies	Plan Reference	Rule Reference
	Publication Date in Header	
Date the Plan was most recently approved by Bobcat Bluff Wind	Publication Date in Header	16 TAC § 25.53(d)(1)(E)

G. Communication Plan (16 TAC § 25.53(d)(2)(B))

Policy Section 5, Pages 5-6; Policy Section 14, Page 19; Appendix 6, Page 31; and Attachment C combine to describe the procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; the Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.

H. Emergency Supply Plan (16 TAC § 25.53(d)(3))

Policy Section 12, Page 19 describes Bobcat Bluff Wind's plan to maintain pre-identified supplies for emergency response.

I. Emergency Staffing Plan (§ 25.53(d)(4))

Policy Section 13, Page 19 describes Bobcat Bluff Wind's plan to address staffing emergency response.

J. Weather Related Hazards (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))

Policy Section 10, Pages 15-19 of the Plan include Bobcat Bluff Wind's plans for monitoring and responding to severe weather as outlined below:

Content/Policies	Plan Reference	Rule Reference
Strong Winds	Page 15	16 TAC §§ 25.53(d)(5)
Lightning	Page 15	16 TAC §§ 25.53(d)(5)
Flood	Pages 15-16	16 TAC §§ 25.53(d)(5)
Winter Storms/Icing/Hailing/Freezing Rain	Page 16	16 TAC §§ 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i)

Content/Policies	Plan Reference	Rule Reference
		16 TAC § 25.53(e)(2)(A)(iii)
Extreme Heat	Page 16	16 TAC §§ 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)
Tornado/Hurricane	Pages 16-17	16 TAC §§ 25.53(d)(5) 16 TAC §§ 25.53(e)(2)(E)

As stated in Appendix 8, Page 33, the Plan does not include a verification of the adequacy and operability of fuel switching equipment because the Bobcat Bluff Wind facility is a wind generation unit that does not rely on fuel to operate and does not have fuel switching equipment installed. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply to Bobcat Bluff Wind.

K. Water Shortage (16 TAC § 25.53(e)(2)(B))

As stated in Appendix 8, Page 33, the Plan does not include a water shortage annex because the Bobcat Bluff Wind facility is a wind generation unit that does not rely on nor require water to operate. Therefore, 16 TAC § 25.53(e)(2)(B) requiring a water shortage annex does not apply to Bobcat Bluff Wind.

Technicians servicing these facilities require potable water for health and sanitary purposes, which is supplied by either an on-site well receiving electricity from both the on-site production as well as an emergency backup generator, or through the use of bottled water which is kept on site in large quantities (pallets).

Policy Section 12, Page 19 related to Emergency Supplies and Appendix 8, Page 33 of the Plan contain a plan to maintain an emergency supply of water for on-site personnel's health and sanitation in an emergency.

L. Restoration of Service (16 TAC § 25.53(e)(2)(C))

Appendix 8, Page 33 of the Plan identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat.

M. Pandemic and Epidemic (16 TAC § 25.53(e)(2)(D))

Appendix 8, Page 33 of the Plan and Bobcat Bluff Wind's Business Continuity Plan also included as Attachment D to the Executive Summary address Bobcat Bluff Wind's pandemic and epidemic emergency response plan.

N. Hurricane (16 TAC §§ 16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(E))

The Bobcat Bluff Wind facility is not located in a hurricane evacuation zone.

O. Cyber Security (16 TAC § 25.53(e)(2)(F))

Attachment E to the Executive Summary (IT 05-PR0170 Incident Response Procedure) is Bobcat Bluff Wind's cyber-security emergency response plan.

P. Physical Security Incident (16 TAC § 25.53(e)(2)(G))

The following sections of the Plan combine to create Bobcat Bluff Wind's physical security incident response plan:

Content/Policies	Plan Reference
Fire Prevention	Policy Section 6, Pages 6-7
Fire	Policy Section 7, Pages 8-12
Life Threatening Emergency Medical	Policy Section 8, Pages 12-13
Criminal Behavior	Policy Section 9, Pages 13-15
Environment	Policy Section 11, Page 19
Emergency Supplies	Policy Section 12, Page 19
Emergency Staffing	Policy Section 13, Page 19
Bomb Threat Information List	Appendix 3, Page 23
Map of the Directions to the Medical Care Center	Appendix 4, Page 24

Q. Appropriate Additional Annexes (16 TAC § 25.53(e)(2)(H))

The following list are additional sections of Bobcat Bluff Wind's Plan that are appropriate for the Bobcat Bluff Wind facilities:

Content/Policies	Plan Reference

Content/Policies	Plan Reference
Fire Prevention	Policy Section 6, Pages 6-7
Fire	Policy Section 7, Pages 8-12
Life Threatening Emergency Medical	Policy Section 8, Pages 12-13
Criminal Behavior	Policy Section 9, Pages 13-15
Earthquake While in a Turbine	Policy Section 10, Pages 17-18
Earthquake While on the Ground	Policy Section 10, Pages 18-19
Environment	Policy Section 11, Page 19
Bomb Threat Information List	Appendix 3, Page 23
Fire Prevention Plan	Appendix 7, Page 32

R. Drills (16 TAC § 25.53(f))

Bobcat Bluff Wind conducted a drill on its Plan in 2021. Bobcat Bluff Wind's 2022 drill has not yet occurred. Bobcat Bluff Wind will file a supplement in this docket upon completion of the 2022 drill.

April 18, 2022

Respectfully Submitted,

/s/ Jenny Fink
Jenny Fink
Asset Manager
Bobcat Bluff Wind Project, LLC

ATTACHMENT A

4.3 Risk Level	Standard	Language	Country
N/A	4.7 EMERGENCY RESPONSE	EN	US/Canada/Mexico

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PURPOSE

Disasters are the consequence of inappropriately managed risk. These risks are the product of a combination of both hazards and vulnerability. In order to prevent loss from a disaster, an Emergency Preparedness and Response Plan (EPRP) must be developed, implemented and regularly tested.

The purpose of this Emergency Preparedness and Response Plan (EPRP) is to assist employees, sub-contractors, contractors, suppliers and management in making quality decisions during times of crisis.

This plan contains guidance in determining the appropriate actions to be undertaken to prevent injury and property loss, minimize hazards to human health and safety and to the environment from fire, explosion, or any unexpected release of hazardous materials to the air, soil, surface or groundwater, and natural or human disasters.

This document acts as a guideline in the event of an emergency. Every possible version of every imaginable scenario can never be captured in a usable document. The steps described may not occur in the same order at every site, every time, but this EPRP provides baseline directions on the most common steps necessary to address each situation listed.

SCOPE

This EPRP will serve as the baseline plan for employees and visitors in the event of an emergency. In situations where this plan runs in parallel with another entity's plan (for example a building manager, contractor, project manager, or customer) the plans shall be evaluated to determine if gaps exist, and management must coordinate to ensure effectiveness in the event of an emergency.

The most current version of this plan, as indicated in the main page document header and the document history on the last page, are the only permitted versions of this plan. The most current version supersedes any earlier versions.

This plan applies to all EDF Renewables facilities, to include but not limited to wind, solar, bio and office locations. UNLESS SPECIFICALLY STATED, THE TERM "HE" OR "SHE" SHALL REFER GENERICALLY TO AN INDIVIDUAL AND NOT A SPECIFIC GENDER.

ROLES AND RESPONSIBILITIES

While the Site Manager can develop and enforce appropriate procedures to follow in the event of an emergency situation, it is the responsibility of every employee to become acquainted with the EPRP prior to an emergency and respond accordingly.

1. Health and Safety Team

The EDFR Health and Safety Team shall bear sole responsibility for updating this plan on an annual basis, and ensuring it is implemented across all sites. HSE is the only entity within EDFR who may make changes to this document.

2. Employees

Every employee shall take reasonable care to protect the health and safety of themselves and of other employees present and inform their manager of potential hazards present on site.

Every employee shall serve in the capacity of emergency first responder. Each employee shall be trained to the same level of first responder, and be trained in CPR, First Aid, and AED.

It is the responsibility of each employee to have a representative who has been properly trained and who understands his roles and responsibilities as a substitute. When the employee chooses his substitute, he must verify he has the training and authority to fulfill his role during an emergency.

3. EPRP Coordinator (CANADA SITES)

When an emergency situation occurs at the site, office and/or facility, the safety of employees and visitors will be coordinated by the EPRP Coordinator or his representative. The EPRP Coordinator shall be the Site Manager of the site, office and/or facility, and he shall name a person who will be able to be the Emergency Contact in case of his absence.

4. Site Manager

The site manager shall ensure that the employees under his care are present and safe in the event of an incident. He/she must ensure all employees are present after a Roll Call.

He/she must inform his/her employees about the risks related to their job.

He/she must ensure all employees have read and understand the site EPRP. He/she must make sure all the rescue equipment is available and in good condition.

He/she must ensure the EPRP is complete, up to date and distributed to the proper parties.

He/she ensures that the EPRP is used correctly and that emergency operations comply with current regulations (federal, provincial or state, corporate and local).

In the event where the SM is not located fulltime on a site, he/she designates an EPRP representative who will be responsible in case of emergency.

He/she ensures that material, financial and personnel resources are sufficient to enable the development and implementation of the EPRP and the implementation of the training program.

He/she ensures that action plans are executed to correct any non-compliance and to implement the recommendations of post-incident reviews.

In the event that the emergency creates off-site impacts, he/she will establish a center of claims (Canada).

In collaboration with the HSE Manager and other internal and external resources, he/she declares the end to an emergency.

5. Contractors, Sub-contractors and Visitors

The contractor or other entity makes available the skilled labor and equipment required during emergencies and collaborates with the site manager or designee for a prompt and effective response.

All contractors and sub-contractors must sign the Contractor Orientation acknowledgement before working on site, at least once a year or after a major update of the document.

DEFINITIONS

OSHA: Occupational Safety and Health Administration

CNPI: National Fire Code of Canada 2010

CSA: Canadian Standards Association

Defensible Space: An area around a building or other protected area in which vegetation, debris, and other types of combustible fuels have been treated, cleared, or reduced to slow the spread of fire to and from the building or protected area.

DRP: Disaster Recovery Plan

EMC: Emergency Measures Committee

EPRP: Emergency Preparedness and Response Plan

ERT: Emergency Response Team

ESS: Emergency Escape System (Emergency Rescue Kit)

HSE: Health, Safety and Environment

Incident Reporting Tool: The tool (Sphera) used to collect incident and accident data and provide statistical reports to act upon.

LDSS: Lightning Decision Support System

NFPA: National Fire Protection Association

OHS: Occupational Health and Safety

OR: Owner Representative

QHSE: Quality, Health, Safety and Environment

SDS: Safety Data Sheet

SM: Site Manager / Project Manager

WCB: Workers compensation board

PV: Photovoltaic

Wildfire: An uncontrolled fire in an area of combustible vegetation occurring in rural or low population density urban areas.

POLICY

1. Legal Requirements

This EPRP will meet the applicable requirements of federal regulation, including provincial or state legislation, as well as local regulations regarding emergency preparedness and response planning.

Failure to comply with this plan may result in disciplinary action up to and including termination. This plan will be reviewed at least annually by HSE and may be revised based on changes to federal, provincial or state and local regulations and requirements.

The present EPRP is aligned with:

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code:
- NFPA 10 – Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety; The EPRP foresees, among others:
- Development and application of a Fire Safety and Emergency Preparedness and Response Plan;'

2. EPRP Distribution

Every site will develop and maintain an individual EPRP. Sites that are serviced or maintained by the same group of personnel (for instance, adjoining solar sites) shall have an EPRP for each site.

The EPRP format will be determined by HSE and maintained on the document management system by Document Control.

All EPRP contact information and appendix pages for each facility / project must be updated annually. The updated contact page shall be sent to the Operations Control Center (OCC) and HSE. When a project EPRP is changed or information updated, the plan shall be updated and forwarded to the OCC and HSE within 72 hours.

A copy of the EPRP shall be provided to all employees, upon hire and after any changes in site/facility operations or layout.

Additionally, hard copies of the site EPRP shall be kept in a prominent location near the facilities main entrance. EPRP's shall be stored in a red binder that is not similar to other binders utilized at the site. This allows ready identification by any personnel on site. All site personnel shall be familiar with the EPRP location.

3. Training

Training is an important part of the EPRP. Training should be continuous and on a regular basis for employees and first responders to maintain their ability to use the emergency equipment and act appropriately in an emergency.

To ensure the instructions contained within the EPRP are properly followed during site/facility emergencies, a training program is to be developed and training provided to all employees, upon hire and after any changes in site/facility operations or layout. This training will be conducted yearly and provided in Dayforce.

The training must include exercises appropriate to the work site that simulate the potential emergencies identified in the EPRP.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the FORM, COURSE CRITIQUE. The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the Incident Reporting Tool by the HSE representative responsible for that site.

4. Drills and Exercises

To ensure that the site EPRP is adapted to meet current site conditions and that all involved individuals will respond properly, the EPRP will be tested on a regular basis (but not less than once per calendar year) by the site manager.

Practical exercises should be performed regularly in order to: train employees and test their skills, check the EPRP and its components and verify the efficacy of the emergency communication and organizational structure. These exercises should be regularly reviewed to identify and correct deficiencies.

An evacuation drill of the site must be performed at least once a year. To aid in these drills during a real emergency, a map of the facilities shall be posted at the site showing the escape routes, rescue evacuation kits, shelters, fire extinguishers, exits to be used during an evacuation and the designated assembly areas.

Annual site drills do not require the attendance or inclusion of local emergency services (fire department, emergency room, police, etc.).

New sites or newly acquired sites shall hold, upon site commissioning or when EDFR accepts responsibility for the site, a full drill that includes local emergency services. These drills shall, as accurately as possible, mimic a real-time rescue event and include and exercise as many rescue organizations as possible. Though not required, at the sites request HSE may manage and coordinate the execution of these drills.

Every 5 years, each site shall conduct a full drill that includes local first responders and emergency services.

Specific areas to be evaluated during the drills will include the following:

- Evacuation and accountability of personnel;
- Proper functioning of alarm system (if applicable), radios and/or phones;
- Special procedures for evacuation of personnel with special disabilities or impairments;
- Response time of emergency response personnel;
- Adherence to EPRP procedures.

The effectiveness of the training sessions and the training program in general should be evaluated and documented on the FORM, COURSE CRITIQUE. The critique shall evaluate what areas of the training need improvement, what should be sustained, and what can be done differently to improve the overall efficacy of the training.

Completed critiques shall be forwarded to the area HSE specialist within 72 hours of the completion of the training. HSE shall review each critique, evaluate the training and engage appropriate parties as necessary to address any mentioned shortcomings. HSE shall file the critiques in a site-specific folder on ECRM or the HSE drive.

Any suggested improvements to the training that merit follow-up or require long term implementation shall be entered into the Incident Reporting Tool by the HSE representative responsible for that site.

5. Emergency Communications

In the event of an on-site emergency, the Site Manager, Local Manager or equivelant shall be deemed the Emergency Manager. The Emergency Manager is in charge of directing the local response to the incident until:

1. Relieved by competent first responders.
2. Relieved by a higher authority within the EDFR organization.
3. The emergency is resolved.

At the first notification of an emergency or crisis, the Emergency Managers priorities shall be:

1. Notification of first responders through 911 or area dispatch.
2. Scene Management. Assigning EDFR resources and employees to respond to the emergency as appropriate and safe, as directed in the individual response sections of this document.
3. Notification of the first level of management above the Emergency Manager.
4. Requesting additional resources as required.
5. Incident resolution
6. Reporting

NOTIFICATION TIERS

After alerting appropriate first responders and dispatching EDFR resources, as time permits the Emergency Manager shall make notification to the tier of EDFR management above the Emergency Manager. This should be the only internal

notification the Emergency Manager makes, as further notifications are taken by the higher tiers within EDFR. A typical tier system will follow the format found in Appendix 6: Emergency Communications Flowchart.

- **Tier 1: Emergency Manager.** The highest-level manager, or their designee, ON SITE who manages the emergency.
- **Tier 2: Area, Work Group, Facility or Equivalent Level Manager.** This is the Emergency Managers direct point of contact. Unless requested by the Emergency Manager, no other tier should have direct contact with the Emergency Manager, to allow them to focus on emergency management. The Tier 2 individual is responsible for contacting HSE and OCC as appropriate and obtaining additional EDFR resources as requested by the Tier 1.
- **Tier 3: Senior Manager or Director.** This tier is responsible for making the broader notifications to the senior management group within EDFR. They are responsible for communicating with Tier 2 and ensuring EDFR resources as requested by Tier 2 are implemented.
  In addition, this tier shall be responsible for making notifications to agencies who specifically regulate power generation or transmission, including but not limited to :Public Utility Commission of Texas or other states, Office of Public Utility Counsel, local or state power-regulating entities, and emergency operations centers and/or NERC reliability coordinators.
- **Tier 4: Executive Committee.** Upon notification of an emergency, this Tier conveys any required information to the CEO. This Tier is responsible for managing any potential company-wide effects of the emergency and ensuring that Tier 3 is made aware of any potential ramifications that need to be managed at the site level. This Tier is responsible for evaluating any effects the emergency may have on external stakeholders, and as required shall be the point of contact for any media outlets. Tier 4 personnel or their designees are responsible for making internal, company-wide incident notifications based on the severity chart found below.
- **Tier 5: External Stakeholders and Media.** This Tier does not have a direct link to the emergency but may drive the response through contractual requirements or opinion.

INTERNAL COMMUNICATIONS

Tier 4 personnel hold overall responsibility for communicating to the EDFR Renewables organization details concerning high profile incidents and emergencies.

In general, HSE will provide these internal communications in the form of Lessons Learned, Safety Notifications, and Incident Notifications. On occasion, an incident may rise to the level requiring direct communication from the CEO, such as in the event of a fatality or catastrophic equipment failure. In these instances, Tier 4 personnel will collectively decide the wording, format, and responsible party for this communication.

Severity	Incident Types	Preliminary Report	Complete Investigation Report
LOW	**Near Miss** **Minor** Property Damage **First Aid**	X	
MEDIUM	**Significant** Near Miss/High Potential Incident **Significant** Property Damage	X	X
HIGH	**Recordable Incidents** (Fatality, Lost Time, Medical Treatment, Modified Work)	X	X

- Low Severity Incidents do not warrant any company-wide communications.
- Medium Severity Incidents may require routine company-wide communications based on investigation findings but typically do not require any communications on an emergency basis.
- High Severity Incidents require an initial event notification with any immediately known facts, as well as a follow-up notification following conclusion of the investigation and any legal review required.

6. Fire Prevention

Listed below are specific procedures that shall be addressed by the site to minimize the occurrence of, and impact from, a fire emergency. Special emphasis is placed on housekeeping and storage practices in all maintenance, shop, and general office areas where flammable and combustible materials are used and stored.

Fire prevention is the responsibility of all personnel. Employees shall follow safe practices to minimize fire hazards, and managers must ensure safe practices are followed daily. As an organization EDFR is committed to preventing the occurrence of fires and situations that may promote a fire at any site or facility.

INSPECTION OF FIRE PROTECTION EQUIPMENT

All fire protection equipment will be inspected monthly by the site manager or designee.

All areas at each site/facility will be inspected to check for unsafe conditions, such as blocked or locked fire exits, poor housekeeping, smoking in non-designated areas, flammable/combustible materials not stored properly and obstructed access to electrical rooms and panels, etc. All results will be recorded on FORM, FACILITY INSPECTION CHECKLIST.

FACILITY EMERGENCY ALARM SYSTEM

Not all jurisdictions, states or provinces require the presence of a fire alarm and/or fire suppression system.

As part of the annual drills, the fire alarm system (if equipped) shall be tested for functionality after alerting the alarm company (or fire department if directly monitored) of the drill.

For those sites who do not have a central facility alarm system, a method of communicating a fire hazard to all employees in a rapid and obvious manner shall be developed at the site. This method of notification may include radio, whistles, air horns or yelling (for example), provided that all potential occupants of the facility can be notified from a singular location, meaning the notification process does not require an individual to move through the facility making notifications.

CREATE A WILDFIRE PREVENTION PLAN

Area Managers in areas where wildfire poses a potential hazard (even limited times of the year) consult with their local BLM (Bureau of Land Management) office or other fire response entity to develop a site-specific Wildfire Prevention Plan (Appendix 7). This plan should include criteria for operations during high fire risk conditions, creation of Defensible Space, and other operational activities or restrictions to reduce the risk of igniting a wildfire. In addition, the plan should include site shutdown procedures, site evacuation, and protection of personnel and equipment in the event of wildfire.

The site FACILITY OPERATING PLAN will specifically indicate whether or not local conditions require a Wildfire Prevention Plan, as dictated in WORK INSTRUCTION, FACILITY OPERATING PLAN.

CREATE DEFENSIBLE SPACES

One of the cheapest and most effective ways of mitigating the effects of wildfire is by creating spaces around solar panels, transformers and turbines that is void of fuel (grasses, trees, brush). The concept of Defensible Space (also known as firescaping) reduces the risk of fire starting and/or spreading from one area to another on a property or site. By following the basic principles of Defensible Space, EDFR sites can reduce the risks associated with drought and wildfires

1) The primary principle of Defensible Space is fuel reduction. Minimizing dried grasses, vegetation and debris by early season weed abatement and regular ongoing maintenance will reduce combustible fuel mass onsite.
2) In fire-prone areas, cut dry weeds and grass in early morning hours when temperatures are cooler thus reducing the chance of sparking a fire. This is especially important in areas where there are rocks, and mower blades can hit rocks and create sparks which set fire to dried grasses.
3) When possible remove surface litter from cutting/mowing operations.
4) Ensure a perimeter which is “low, lean and green” around structures:
    a) Offices
    b) Substations
    c) Transmission lines
    d) Meteorological towers
    e) Laydown yards
    f) Solar arrays
    g) On-site fueling stations
    h) On-site LP storage
    i) Other areas that need protection or prevent fire from spreading to the surrounding community.

Monitor Weather and Fire Conditions

Current fire conditions are updated in real time on the US Geological Survey webpage (USGS Firemap), as well as the ArcGIS webpage (ArcGIS Fire Information).

7. FIRE

Employees and contractors shall notify the SM immediately upon discovery of a fire. Different types of fire will require different types of response.

GRASS, BRUSH AND FOREST FIRE

1. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher (if you have been trained on the use of an extinguisher). Prohibit access to the affected area by other employees.
2. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
3. The SM shall obtain details of the exact location and size of the fire from the Notifier.
4. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
5. The SM will contact any landowners in the area with the location and size of the fire.
6. The first responders may be directed by the SM to visit any buildings / dwellings that may be in the anticipated path of the fire.
7. Only employees trained to fight fires may do so and only under instruction from the Civilian Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or "fight" a grass/brush fire. The employee/contractor role is to notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your training or your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!
8. Report to the nearest assembly (Muster point) area for roll call until "ALL CLEAR" is given or until directed to do otherwise. DO NOT run or create panic; DO NOT go to your car or leave the premises unless your safety is in danger.
9. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
10. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

IF CAUGHT IN THE FIRE OR HEAVY SMOKE:

- Take short breaths: breathe through your nose, then crouch under the smoke line to escape;
- Place a shirt or a cloth covering over your nose and mouth, if possible.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TURBINE FIRE – NO PERSONNEL PRESENT

1. The employee discovering the fire shall immediately get the GPS coordinates of turbine.
2. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
3. The SM shall call 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
4. Employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or "fight" a turbine fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
5. Report to the nearest assembly (Muster point) area until "ALL CLEAR" is given or until directed to do otherwise. DO NOT go to your car or leave the premises.
6. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.

Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TURBINE FIRE – PEOPLE IN NACELLE, HUB OR ROTOR

1. If a fire occurs up tower while employees or contractors are working in the nacelle or hub immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
2. Evacuate Immediately.
3. Only employees trained to fight fires may do so. In all other events, employees, contractors, and first responders shall at no time attempt to go up tower to extinguish or "fight" a turbine fire. The employee or contractor role is to

notify the SM and lead first responders to the scene. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities, if you think the fire has escalated beyond your capabilities, leave!

4. If necessary, provide rescue assistance to the person in the turbine. Do not place your own life at risk.
5. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. If you are caught in a fire while working in the Nacelle, Hub or Rotor:
    a. In case of heavy smoke, crouch below the smoke line to get to the lowest point;
    b. Take short breaths; breathe through your nose;
    c. Place a shirt or a cloth covering over your nose and mouth, if possible;
8. If passage through the tower is impossible;
    a. Stay calm, access the top of the turbine if possible and stay there until rescue personnel arrive;
    b. Maintain communication with the ERT;
    c. If necessary and possible, open hatches to ensure that fresh air is available.
    d. If it is necessary to exit the turbine, choose the safest way out;
    e. Reach the emergency escape kit;
    f. Inspect the rescue equipment;
    g. Locate the anchor point and attach the descent equipment.
    h. Exit the turbine.
7. When EVERYBODY is out, have the turbine stopped remotely.
8. When outside, keep away from smoke and fire. Evacuate people to the closest safe area.
9. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

FIRE AT THE OPERATIONS FACILITIES, BUILDINGS, OFFICES

1. In the event of a fire in the operations facilities, the employee discovering the fire shall immediately stop work.
2. Evaluate the situation to determine if the fire can be extinguished safely with an extinguisher. DO NOT attempt to fight a fire that has escalated beyond your capabilities; you and only you can evaluate your capabilities. If you think the fire has escalated beyond your capabilities, leave!
3. Activate the fire alarm and alert all employees in the building.
4. Prohibit access to the affected area to other employees;
5. The person discovering the fire shall immediately get the GPS coordinates or address of the facility.
6. Call the SM. The SM will take on the management of the incident and implement the site fire plan, if applicable.
7. Call 911 with GPS coordinates of meeting point location, the exact location and the size of the fire.
8. The Notifier to remain in a safe place near the incident until help arrives and to direct the first responders toward the fire;
9. Calmly form evacuation lines. Be ready to merge with other people evacuation building; close doors to offices and buildings as you leave;
10. If you are descending a stairwell, stay on the right side. Fire fighters use their right side when climbing stairs;
11. Keep talking to a minimum;
12. Listen for instructions and follow them;
13. Employees will assemble at the Muster Point until “ALL CLEAR” is given by the SM or until directed to do otherwise; DO NOT Return to building for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
14. All employees, contractors and visitors shall remain clear of buildings and structures until an all clear notice is received from fire-fighting personnel;
15. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
16. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix VII – Overall Site Map

FIRE IN A SOLAR POWER SYSTEM, INVERTER OR BATTERY

1. In the event of a fire in a Solar Power System, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight a fire in a Solar Power System.
2. Activate the fire alarm and alert all employees at the site or near the solar power system.
3. Prohibit access to the affected area to other employees;
4. The person discovering the fire shall get immediately the GPS coordinates and ask for the shutdown of the utilities, including the electrical utilities to remove the electrical shock hazard.
5. Isolate and shutdown as much of the system as possible
6. Isolate the photovoltaic system at the inverter using reliable methods if possible and not hazardous.
7. Call the SM. The SM will manage the incident and implement the site fire plan, if applicable.
8. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) with GPS coordinates of the Solar Power System, the exact location and the size of the fire AND inform the 911 operator that the emergency is a fire in a solar system or in a building equipped with a solar power system.
9. Inform emergency personnel about the system being a thermal system or a photovoltaic system as photovoltaic system includes electric shock hazard, while thermal system includes potential scalding from hot fluid.
10. The Notifier shall remain in a safe place near the incident until help arrives to direct the first responders toward the fire;
11. While salvage covers can be used to block sunlight, some electricity will still be generated unless they are made of material 100% light blocking. Care is needed to make sure that wind does not suddenly blow off any salvage covers covering panels. Foam is not effective in blocking sunlight and will slide off the solar array.
12. Employees will assemble at the Muster Point until “ALL CLEAR” is given by the SM or until directed to do otherwise;
13. Remain at the assembly area until directed to leave; All employees, contractors and visitors shall remain clear of the Solar Power System until an all clear notice is received from fire-fighting personnel;
14. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix VII – Overall Site Map

FALLEN, SWAYING OR BOUNCING POWER LINES

1. If an overhead power line has fallen to the ground, it may still be live. Keep well away – the current can travel along the ground, through objects such as fences or metal objects and through water or other liquid. You do not need to touch the power line to be killed or injured by it.
2. If you see a fallen power line stay well clear – ideally distance yourself by at least 10 meters / 33 Feet.
3. Call 911 or the local power provider.
4. Call the SM
5. If power lines fall on your car, it is safest to remain inside the vehicle. Do not touch the windows, doors, or anything metal such as the radio. Wait for trained professionals to rescue you. Warn anyone who starts walking towards the car to stay far away.
6. Use your horn to alert others.
7. If you are in a vehicle when a line falls, if it is safe to do so, remain in the vehicle until emergency services or local electricity provider says it is safe to get out. If you must get out of the vehicle because of fire, you must get out of the vehicle without touching metal and the ground at the same time.
    a. Gently open the door all the way, being careful not to touch anything metal, and look for the flattest spot on the ground.
    b. Position your body so that you are facing toward the ground.
    c. When you jump, you will be more stable if you tuck in your elbows and keep your hands clasped. Jump off the car and land on both feet at the same time with your arms folded across your chest. Do not contact the vehicle and the ground at the same time with any part of your body or clothing.
    d. Shuffle (or bunny hop - don't step) your feet across the ground until you reach a safe distance away from the car. A safe distance is considered at least 10 feet (3 meters). Keep your feet no further than 6 inches apart.

8. Your car may be pushed in the rear bumper by another car to attempt to remove the power lines and get your car away, if emergency circumstances dictate an immediate evacuation. Do not attempt this if there is not an immediate threat.
9. In the event the vehicle catches fire, DO NOT attempt to fight the fire. Only employees trained to fight fires may do so and only under instruction from the Civil Authorities. In all other events, employees, contractors, and first responders shall at no time attempt to extinguish or "fight" a fire in the presence of fallen electrical power lines. The employee or contractor role is to notify the SM and lead first responders to the scene
10. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

ELECTRICAL FIRE IN SUBSTATION

1. In the event of an electrical fire inside the substation, the employee discovering the fire shall immediately stop work. DO NOT attempt to fight an electrical fire;
2. Activate the fire alarm and alert all employees at effected location.
3. Prohibit access to the affected area to other employees.
4. The person discovering the fire shall immediately get the GPS coordinates of the substation.
5. Call the SM. The SM will take on management of the incident and implement the site fire plan, if applicable.
6. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. Employees, contractors, and first responders shall at no time attempt to extinguish or fight an electrical fire. The employee or contractor role is to notify the SM and lead first responders to the scene.
8. Remote isolation of the substation should be requested, completed, and confirmed.
9. Transformers and capacitors contain flammable/combustible material and all personnel must remain in safe areas away from these potentially explosive sources.
10. IF CAUGHT IN THE FIRE OR HEAVY SMOKE
    a. In case of heavy smoke, crouch below the smoke line to get to the lowest point then crawl to escape;
    b. Take short breaths; breathe through your nose;
    c. Place a shirt or a wet rag over your nose and mouth, if possible;
11. Employees will assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise;
12. Listen for instructions and follow them; DO NOT return to the substation for personal items; DO NOT run or create panic; DO NOT go to your car, or leave the premises;
13. If the SM present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
14. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

ELECTRIC SHOCK

1. In the event that an employee receives electrical shock, work at the location shall be stopped immediately.
2. DO NOT attempt to rescue the injured employee unless you know and verify no risks remain.
3. Electrical contact can cause muscle contraction, preventing the victim from releasing their grip on an electrical source.
4. Rescuing a shock victim at elevation or in the presence of high voltages is likely to require specialized training and tools to do safely. Don't attempt any rescue if you are not confident you can do so safely. DO NOT touch the injured employee
5. Remote isolation of the equipment should be requested, completed, and confirmed.
6. If de-energization is impossible, you may need to remove the victim from a live conductor. While this is never desirable, hazards can be controlled by utilizing tooling that won't conduct electricity (such as a wooden broom handle) to move the victim and donning insulating gloves and overshoes before attempting rescue if they are available.
7. If the only source of power to the victim's locale is a power cord or extension cord to portable equipment, simply disconnecting it at the power source may be sufficient. However, a trip to the breaker box to open the circuit may be necessary.

8. Call the SM. The SM will manage the incident.
9. The SM shall contact 911 (or relevant local authority as appropriate if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
10. Rescues are safest when the power is off, and you are standing on insulating material. Do not touch a shock victim unless you know the source of electricity that incapacitated them is powered down. If there is a risk of a neck injury or similar contingency, do not move the victim at all. Make sure the victim's airways are clear of obstruction, check for breathing and a pulse and provide CPR if necessary (provided you have been CPR trained).
11. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation was necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

EXPLOSION

1. In the event of an explosion, affected employees shall immediately stop working.
2. Activate the fire alarm and alert all employees at effected location.
3. Alert all others present, and if time permits, place equipment in a safe condition.
4. Prohibit access to the affected area to other employees;
5. The person discovering the explosion shall immediately get the GPS coordinates the exact location, the size, the source of the explosion and the nature of any involved hazardous material, if relevant.
6. If the source of the explosion is hazardous material, the Notifier must get the SDS in order to inform emergency personnel of the substance they will have to neutralize.
7. Call the SM. The SM will manage the incident and implement the site fire plan if applicable.
8. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
9. Employees, contractors, and first responders shall at no time attempt to extinguish or fight a fire due to an explosion. The employee or contractor role is to notify the SM and lead first responders to the scene.
10. The SM must ensure that no one was injured by flying debris and the debris didn't cause damage immediately threatening to life. An area of at least 500 meters from the blast site shall be investigated to verify any damage.
11. Employees must assemble at the Muster Point until "ALL CLEAR" is given or until directed to do otherwise.
12. Listen for instructions and follow them; DO NOT return to building; DO NOT run or create panic; DO NOT go to your car or leave the premises.
13. All employees, contractors and visitors shall remain clear of area and structures until an all-clear notice is received from fire-fighting personnel.
14. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
15. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

8. LIFE THREATENING EMERGENCY MEDICAL

INJURY / ILLNESS – GROUND

1. In the event of an injury/illness requiring medical treatment, stop work. If time permits, place equipment in a safe condition, and alert others present.
2. The person discovering the injury/illness shall call 911 if condition is serious.
3. First aid may be administered, if trained and experience personnel are available at the accident location.
4. Unless a tower rescue is involved, do not move the injured or ill person.
5. Try to make them comfortable.
6. If the incident implies Hazardous Material, the Notifier must get the Safety Data Sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
7. Call the SM. The SM will manage the incident
8. The SM shall contact 911 (or relevant local authority as appropriate, if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.

9. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

TOWER EMERGENCY RESCUE

1. In the event of a medical emergency while up tower, work shall immediately be stopped.
2. Immediately notify the SM.
3. Address any potentially hazardous situations for rescuers (i.e. turbine yawing, pinwheeling, etc.).
4. To the maximum extent that your training and knowledge allow, treat the victim.
5. If victim is able to safely remove himself from the tower, immediately begin a supervised descent of the tower. Do not leave the injured alone.
6. The SM shall contact 911 (if not already contacted) and coordinate with the Notifier to lead first responders to the Meeting Point.
7. If the incident implies Hazardous Material, the SM must get the Safety data sheet (SDS) in order to inform the rescuer or the first responders of the substance they will have to neutralize.
8. The SM shall notify all other employees on the site who are trained in tower rescue. All employees shall acknowledge the emergency, and as quickly as safely possible respond to the tower where the emergency is located.
9. If safe, the senior rescuer at the tower coordinates the response of the rescuers.
10. Refer to the tower rescue procedure for specific response guidelines. In general, one person remains at the base of the tower while all over capable rescuers ascend the tower to assist in the rescue.
11. Once the injured is on the ground, ensure that first responders and medical services have prompt access to them.
12. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager as soon as all personnel are accounted for.

9. CRIMINAL BEHAVIOR

It is the responsibility of all employees, contractors and visitors to immediately notify the SM of sabotage, potential sabotage or suspicious activity.

SABOTAGE OR SUSPICIOUS ACTIVITY

1. In case of sabotage or suspicious activity, call the SM.
2. The SM will call 911
3. If sabotage occurs at generating units, transmission facilities, electric collection systems, the operational telecommunication, or control devices associated with generating units, transmission facilities, or electric collection systems the SM shall report the occurrence to OCC and HSE.
4. Do not confront or attempt to detain trespassers or attempt to intervene with suspicious activities. If an immediate threat exists, contact 911 (if not already done)
5. Investigation into suspicious individuals may require conversation with the individual to ascertain that person's connection with the site. At no time should any confrontation be allowed. If suspicious individuals seem hostile or violent, employees shall leave the area and inform the SM.
6. Complete an Accident / Incident Report using the Incident Reporting Tool.

EMPLOYEE, CONTRACTOR OR VISITOR

Confrontational situations between employees, contractors, or visitors involving threats, harassment, confrontations or obscene acts or language shall be reported immediately to the SM.

THIRD PARTY THREATS TO FACILITIES

1. In the event there is a threat to employees or the site, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition.
2. Call the SM to initiate the Evacuation Procedure
3. Call 911 for assistance.
4. Once all employees have been accounted for, the SM will report the site evacuated to authorities.
5. Upon "ALL CLEAR" notification from law enforcement, employees may return to site facilities.
6. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

ACTIVE SHOOTER

1. In the event of an active shooter, affected employees shall immediately stop working.
2. Call 911 – (from an area of safety or concealment) and provide as much of the following information as possible:
    a. Description of suspect(s) and possible location.
    b. Number and the types of weapons.
    c. Suspect's direction of travel.
    d. Location and condition of any victims.
3. Evacuate – If there is an accessible escape path, attempt to evacuate the premises. Be sure to:
    a. Have an escape route and plan in mind.
    b. Evacuate regardless of whether others agree to follow.
    c. Leave your belongings behind.
    d. Help others escape, if possible.
    e. Prevent individuals from entering the active shooter area.
    f. Keep your hands visible.
    g. Follow the instructions of any police officers.
    h. DO NOT attempt to move wounded people.
    i. Call 911 when you are safe.
4. Hide – If evacuation is not possible, hide. Your hiding place should:
    a. Be out of the shooter's view.
    b. Provide protection from gunshots, such as behind a heavy desk.
    c. Not trap you or restrict your options for movement (broom closet).
        i. Lock the door;
        ii. Block the door;
        iii. Silence cell phones;
        iv. Remain Quiet.
5. FIGHT – If no other options exist, and there is imminent/immediate danger to yourself, take direct action against the shooter:
    a. Remain calm.
    b. If you have not already done so, call 911 and leave the line open.
    c. Commit to your actions.
    d. Act as aggressively as possible against the shooter.
    e. Move with speed and force. Improvise weapons if time permits.
    f. Continue to fight until the shooter is physically incapacitated.
6. Once shooter is incapacitated leave the area immediately, taking as many people as possible with you.
    a. Keep hands visible.
    b. Do not group together once outside the building, in the event of a second shooter.
    c. Follow all commands of law enforcement officials.
7. Regroup – When possible and safe to do so, account for all personnel and report this information through one person to law enforcement. Conduct a roll call.
8. Report – As soon as possible and practical, report the incident through the EDFR reporting chain (immediate Supervisor, site manager, and Area Manager).

BOMB THREAT

1. A bomb threat should never be taken lightly; though experience shows that most bomb threats are false alarms. EDFR will consider all bomb threats to be valid.
2. Under no circumstances are employees allowed to engage in any physical search activities.
3. Under no circumstances are employees allowed to enter the building site, until condition is deemed safe by authorities.
4. The use of electrical equipment, radio communication devices, pager or cell phones should be avoided because they produce waves that could trigger the detonation of the bomb. Keep cell phones and pagers closed.
5. When initial threat is received / discovered, gather as much information as possible from the caller using the protocols outlined in the BOMB THREAT INFORMATION LIST. APPENDIX 3 – Bomb Threat Information List.
6. Stop Work! Notify all employees

7. Follow building / Site evacuation procedures and reconvene at defined Muster Location. See APPENDIX 2 – Overall Site Map
8. Call 911 to report the threat and follow instructions given by authorities and cooperate with local officials.
9. Call HSE Manager as soon as possible to report the event.
10. Employees must not make statements to the press regarding bomb threat incidents. Refer to 12.9 Media Instructions.
11. All employees must remain at assembly areas until "ALL CLEAR" is given by the SM or until directed to do otherwise.
12. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

10. SEVERE WEATHER, MONITORING, AND RESPONSE PROCEDURES

Severe weather includes, but is not limited to, strong winds, lightning, hail, ice, snowstorms, and tornadoes.

Please refer to the Working in Extreme Weather and Environmental Hazards Procedure.

STRONG WINDS

1. If possible, objects and equipment that may be carried by the wind should be transferred to a building or secured.
2. Ensure that the emergency brakes are applied on all vehicles.
3. Cover electrical equipment with tarpaulins.
4. All staff must go inside a building or a shelter.
5. Be prepared in case of a power outage.
7. The SM shall monitor weather to provide advance warning of potential strong wind conditions.

LIGHTNING

1. See procedure Working in Extreme Weather and Environmental Hazards Procedure
2. No one shall commence a climb during a lightning event.
3. The SM shall issue an "All Clear" notice when no lightning has been detected at the work site within 30 miles for 30 minutes. An all clear will also be given when the lightning is greater than 60 miles from the site for 30 minutes.
4. If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

FLOOD

1. When a flood occurs, immediately STOP WORK, alert all others present, and if time permits, place equipment in a safe condition
2. Stay current with the weather conditions; Listen to the radio or check via internet for current information in your area.
3. Call your SM
4. Notify the HSE Manager
5. Watch for distant thunderheads, for likely source of flash floods.
6. Notify your employees via radio, intercom, or phone.
7. Cooperate with local officials. Respond to requests for assistance from local police, firefighters and relief workers.

On the Road

1. If you are "downhill" from thunderstorm activity, be prepared to stop on high ground. Water-filled highway dips are difficult to see while driving.
2. Drive at a moderate speed and monitor other vehicles around you.
3. If your vehicle stalls in a water, abandon the vehicle and move to higher ground if safe and possible. Later walls of water may engulf your vehicle.
4. Turn on emergency flashers and do not return to your vehicle until it is safe to do so.
5. DO NOT attempt to cross a stream where water is above your knees.
6. DO NOT try to drive over a flooded road. The water can be much deeper than it appears, and you could be stranded or trapped.
7. DO NOT try to drive around lawfully placed barricades.
8. Stay away from drains and ditches that may have the opportunity to collapse.

9. When driving into areas where flash floods are possible, inform someone of your itinerary and expected time of return. Stick with you plan and check in when you return.
10. Carry a portable radio or use your cell phone to keep alert to weather conditions.
11. If your vehicle is damaged or stalled, stay near it on high ground Search and rescue parties will locate a vehicle more quickly than a person.

Office or Facility

If you must evacuate, you should do the following if it is safe to do so, and time permits:

- Move essential items to an upper floor.
- Turn off utilities at the main switches or valves, if instructed to do so.
- Disconnect electrical appliances.
- Do not touch electrical equipment if you are wet or standing in water.

Employees and contractors shall make safe, any equipment being worked on, exit the field and meet at the designated inside assemble area (if possible).

If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.

If evacuation is necessary, use the emergency escape routes. Appendix 2 – Overall Site Map

Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

WINTER STORMS / ICING / HAILING / FREEZING RAIN

1. The SM shall monitor ice potential to provide advanced warning of potential icing conditions or winter storms.
2. Employees shall stay aware of potential weather conditions by using weather monitoring provider advanced warning notifications.
3. If a winter storm or blizzard warning is issued by third party weather information provider, the SM or designee shall notify all employees adverse weather conditions exist within a 30-mile radius and shall issue a warning to employees and contractors in the field upon which all personnel shall stop work.
4. Employees and contractors shall make safe any equipment being worked on (if possible), exit the field and meet at the inside assembly area.
5. If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

EXTREME HEAT

1. The SM shall monitor weather for the potential for heat conditions that are unusual for the site location.
2. Employees shall stay aware of potential weather conditions by using weather monitoring provider advanced warning notifications.
3. If a high heat or extreme high temperatures warning is issued by third party weather information provider, the SM or designee shall notify all employees adverse weather conditions exist within a 30-mile radius and shall issue a warning to employees and contractors in the field upon which all personnel shall stop work.
4. Employees and contractors shall make safe any equipment being worked on (if possible), exit the field and meet at the inside assembly area.
5. SM or his designee shall individually monitor all employees and contractors for signs/symptoms of heat related illnesses. Refer to EDFR Procedure Working in Extreme Weather.
6. If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

TORNADO / HURRICANE

1. The SM shall monitor the weather to provide advanced warning of potential tornado generating conditions to employees and contractors prior to starting field work.
2. If a tornado watch is issued through a weather service, this means a tornado is possible.
3. The SM shall call employees at the facility site, via radio, cell phone or any other available means to alert them of a tornado watch. The weather monitor or SM shall issue a tornado watch to employees and contractors in the field. The SM shall ensure receipt of tornado watch by employees and contractors in the field and issue an instruction to Stop Work.
4. Employees shall make safe any equipment being worked on (if possible), exit the field and meet at the designated inside assembly area. If a tornado warning is issued this means that a funnel cloud has been spotted or is

strongly indicated on radar. The SM shall issue an immediate instruction to reach the O&M building. People will meet in the reception area for head count and seek shelter in the designated tornado shelter.

The following should be briefed to employees during the tailboard meetings in storm season.

If employees and contractors are unable to reach a designated shelter, the following actions shall be taken:

If in a building, go to interior rooms and halls on the lowest floor. Stay away from glass-enclosed places or areas with wide-span roofs such as warehouses. A corner is safer than the middle of the wall. A bathroom, closet, or room with short length walls is the safest area, especially if on the north or east side of a building. Crouch down and cover your head.
If in a vehicle, do not try to speed away from a tornado. Tornadoes can change direction quickly and can lift a car or truck and toss it through the air. Get out of the vehicle immediately and take shelter in a nearby building. If there is no time to get indoors, get out of the car and lie in a ditch or low-lying area away from the vehicle and protect your head with your arms. Be aware of the potential for flooding.
If in a turbine, employees and contractors shall descend immediately and take cover on the floor of the turbine or turbine basement, if available. Do not attempt to drive to a building.

After a tornado has passed through the facility, the SM shall issue an “All Clear” notice.

Employees, contractors and visitors will meet at the inside assembly area for roll-call. All employees, contractors and visitors shall be accounted for before anyone leaves the facility.

Hurricanes present a unique danger, in that they can potentially encompass various different hazards.

Due to their slow moving nature, there is generally sufficient preparation time before a hurricane impacts a locality.

Sites having the potential for hurricane activity shall have a written, site-specific plan that details:

- How site equipment will be prepared and protected as the hurricane approaches.
- Reporting requirements for employees and trigger criteria for employees to report to the site.
- Consider pre-planned evacuation routes and safe harbors may quickly become congested. Early execution of the plan should be paramount.
- Duplicating irreplaceable site documents and utilizing off site storage when applicable.
- How to shelter in place in the event evacuation becomes impossible.

If evacuation is necessary, use the emergency escape routes. See Appendix 2 – Overall Site Map

After passage of the tornado or hurricane, the Site Manager shall analyze current and expected weather conditions and the safety of returning to the facility.

If the facility has been evacuated (hurricane) the Site Manager shall remotely assign two personnel to travel to the site ahead of the remainder of the site crew. These two personnel shall be responsible for:

- Assessing access to the site
- Identifying any obvious environmental hazards (gasoline spills, changes to river course impacting site, etc.)
- Identifying any electrical hazards that would prohibit site access or functionality (downed transmission lines, etc.)
- Documenting any large scale damage that may pose an immediate hazard.
- If able to safely do so, conduct a brief survey of the site assets to determine their ability to return to service.

After completion of the site survey, a full report will be made (voice or written) to the Site Manager, who shall then develop a Return-to-Site strategy.

Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

EARTHQUAKE WHILE IN A TURBINE

1. If an earthquake occurs while you are in the nacelle, immediately stop work, alert all others present, and if time permits, place equipment in a safe condition.
2. You are safe in a turbine during an earthquake. Remain in the nacelle until the earthquake stops. Avoid using the ladder during the earthquake.
3. Once the shaking stops, immediately evacuate the turbine.
4. Once on the ground:

a. Get into the open.
b. Stay clear of power lines.
c. Move away from buildings, streetlights and utility wires.
d. Avoid roads and bridges or ramps that may have been damaged by the earthquake.
e. If near the ocean or water, reach high ground or go inland.
f. If possible, employees shall make safe any equipment being worked on, and meet at the designated inside assembly area.

5. If the SM is present, he will perform a roll call to confirm all personnel are accounted for. If not, process the roll call on your own.
6. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

EARTHQUAKE WHILE ON THE GROUND

1. If an earthquake occurs while employees or contractors are working on the ground, immediately stop work, alert all others present, and if time permits, make safe any equipment being worked on, shut the gas and electricity off.
2. If indoors:
   a. MINIMIZE your movements to a few steps to a nearby safe place.
   b. DROP to the ground.
   c. Take COVER by getting under a sturdy table or other piece of furniture.
   d. HOLD ON until the shaking stops.
   e. If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building or under the door frame.
   f. Stay away from glass, windows, outside doors and walls, and anything that could fall, such as lighting fixtures or furniture.
   g. Use a doorway for shelter only if it is in close proximity to you and if you know it is a strongly supported load bearing doorway.
   h. Stay inside until the shaking stops and it is safe to go outside;
   i. DO NOT use elevators.
3. If outdoors:
   a. Get into the open.
   b. Stay clear of power lines.
   c. Move away from building, streetlights and utility wires.
   d. Once in the open, stay there until the shaking stops. The greatest dangers exist directly outside buildings, at exits and alongside exterior walls.
   e. Check for ground movement.
   f. If in a moving vehicle STOP as quickly as safety permits and stay in the vehicle. Avoid stopping near or under buildings, trees, overpasses, and utility wires.
   g. Proceed cautiously once the earthquake has stopped.
   h. Avoid roads and bridges, or ramps that might have been damaged by the earthquake.
4. If near ocean or water, reach high ground.
5. If trapped under debris:
   a. DO NOT light a match.
   b. DO NOT move about or kick up dust.
   c. Cover your mouth with a handkerchief or clothing.
   d. Tap on a pipe or wall so rescuers can locate you.
   e. Shout only as a last resort, as shouting can cause you to inhale dangerous amounts dust.
6. After the shaking stops
   a. Attempt to contact employees and SM to report alive and safe.
   b. Call 911, if assistance is needed.
   c. Attempt to locate employees needing help and report your co- workers alive to the SM.
   d. Call for help for yourself and/or co-workers, if needed.
   e. If possible and safe, attempt to reach the MUSTER POINT.

7. If the SM is present, he/she will perform a roll call to confirm all personnel are accounted for, if not, process the roll call on your own.
8. Complete an Accident / Incident Report using the Incident Reporting Tool and place a phone call to the HSE Manager.

11. ENVIRONMENT

For purposes of the EPRP, a spill is defined as the unintentional release of any chemical in excess of 15 gallons, regardless of location, hazard rating or surrounding circumstances.

SPILLS – HAZARDOUS OR NON-HAZARDOUS MATERIAL

If a spill occurs, immediately Stop Work, alert all others present, and if time permits, make safe any equipment being worked on.

- Confine the spill, prevent chemical from spreading and entering the drainage system. Stop the spill from becoming worse by shutting down pumps, closing valves or clamping broken hoses;
- Try to contain the spill from spreading further through diking or other means;
- Add neutralizing agents and/or absorbents;
- Inform the SM.
- Be prepared to show the SDS.

DO NOT attempt to handle any spilled material that you cannot identify (assume it is hazardous)

Complete the Spill Report and place a phone call to the HSE Manager.

12. EMERGENCY SUPPLIES

All sites shall maintain an emergency stock of spare parts, water, and food products sufficient to maintain the site for a period of 72 hours.

This stock shall include bottled water, sufficient backstock of the most commonly faulted parts, and food stuffs that don't require refrigeration or heating to consume. MRE style meals are preferred as they are shelf stable and self-contained, but the decision on which food items to stock is wholly up to individual site teams.

13. EMERGENCY STAFFING

In the event of an on-site emergency during normal business hours that does not require evacuation, the technicians and management team assigned to that site shall maintain the facility and operate it as the emergency allows.

Emergency shut down procedures due to an on-site emergency are at the site managers discretion and do not require consult with outside entities.

During an emergency during normal business hours that does require evacuation, the site manager shall notify OCC that the site is being evacuated and turn operations of the facility over to them. OCC shall maintain site operations to the maximum extent that can be executed remotely, until such time that continued operation constitutes an immediate threat to the site or environment, at which time OCC may elect to take the facility offline.

In the event of an emergency outside of normal business hours, OCC shall make the determination of whether personnel are required to respond to the site. If required, OCC will first contact the on-call site personnel, who may then elect to call additional personnel.

Sites that cannot follow this plan due to site manning (temporary or permanent) shall develop a site-specific plan.

14. MEDIA

EDF Renewables recognize that it is essential to present accurate information to the news media concerning an emergency situation involving any of our sites or facilities.

1. You are not permitted to give any information, good or bad, to the media.
2. The SM will contact the EDFR communications team to speak with the media.
3. If a journalist or any other person that is not an authorized person asks you a question, you must politely and professionally answer: Please contact the Site Manager. He/she will give the name and phone number of the person in charge of communications.

REFERENCES

SharePoint (FDCC)

- Form, FO5473 Facility Inspection Checklist
- Form, FO0105 EPRP Contact Form
- Form, 5385 Course Critique

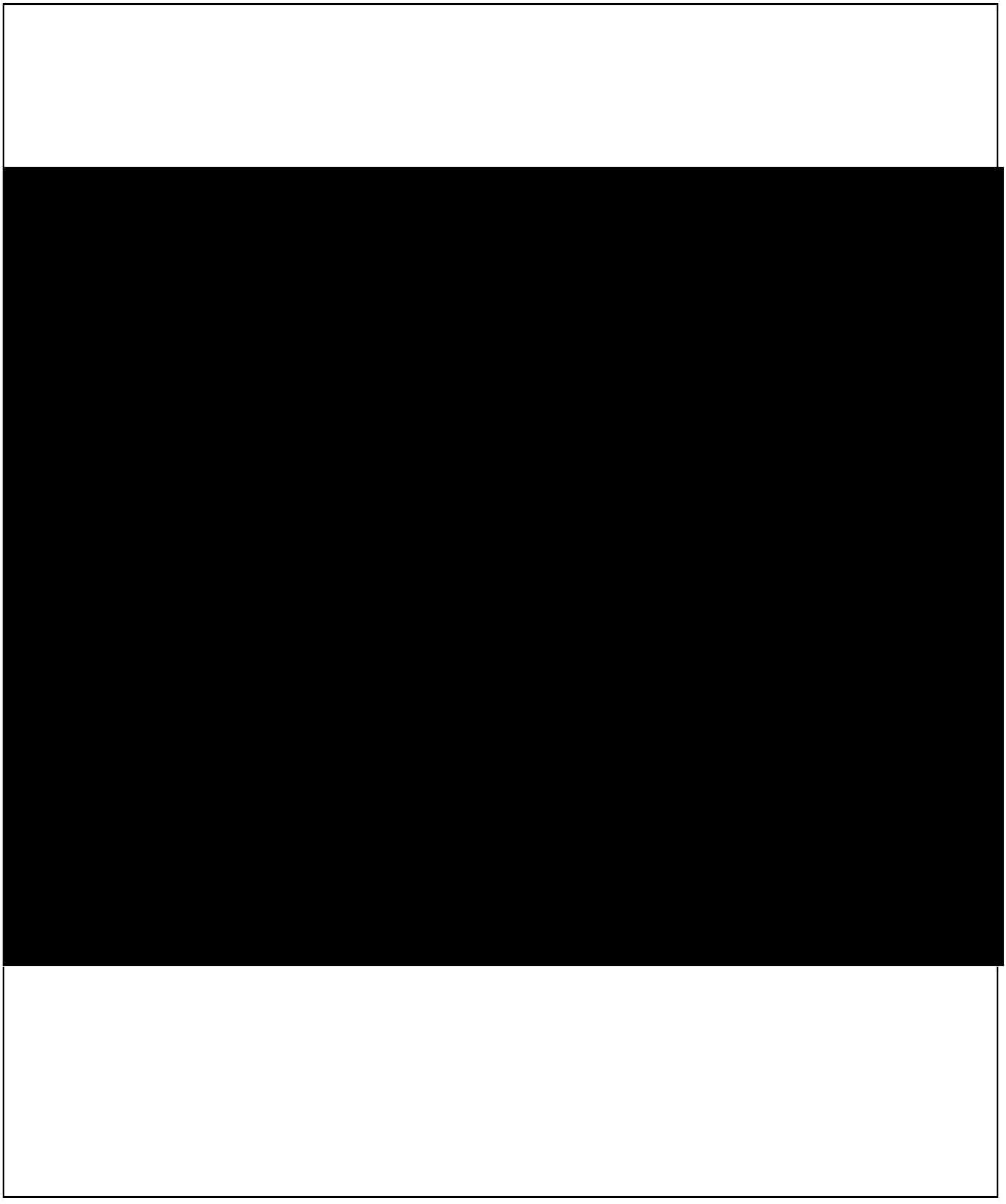
EXTERNAL

- OSHA 1910.38 Emergency Action Plan Requirements
- Alberta, Occupational Health and Safety Code;
- Canada Occupational Health and Safety Regulations;
- CSA Z731-03 (R2014)- Emergency Preparedness and Response Standard;
- NFPA 1, Fire Code:
- NFPA 10 – Portable Fire Extinguishers
- Ontario, Occupational Health and Safety Act
- Quebec, Regulation respecting occupational health and safety

DOCUMENT HISTORY

Rev #	R&E ID	Author	Owner Approval	Date	Update Notes
0	-	[redacted]	[redacted]	3/8/2015	New Document
1	-	[redacted]	[redacted]	9/3/2016	-
2	-	[redacted]	[redacted]	11/7/2017	Updated contact numbers, responsibilities, supervisor references & added additional location fields.
3	-	[redacted]	[redacted]	1/15/2019	Added data and form tracking requirements. Removed pictograms, streamlined document, clarified references.
4	-	[redacted]	[redacted]	12/30/2019	Add fire prevention section & appendix.
5	-	[redacted]	[redacted]	6/12/2020	Added statutorily required language for State of Texas".
6	-	[redacted]	[redacted]	7/15/2020	Added Incident Reporting Tool to definitions and referenced Incident Reporting Tool for incident report completion.
7	-	[redacted]	[redacted]	3/31/2022	Added PUCT requirements including HSE responsibilities. 47256759.1

APPENDIX 1: FLOOD HAZARD MAP



APPENDIX 2: OVERALL SITE MAP AND EVACUATION ROUTES

APPENDIX 3: BOMB THREAT INFORMATION LIST

WHEN BOMB THREAT IS RECEIVED

1. Listen
2. Be calm and courteous
3. Do not interrupt the caller
4. Obtain as much information as possible
5. Complete this form and give it to your supervisor

EXACT WORDING OF THREAT

TELEPHONE CALL INFORMATION

DATE	TIME	DURATION OF CALL
	☐ AM ☐ PM	

QUESTIONS TO ASK

What time is the bomb expected to explode?	
Where is it?	
What does it look like?	
Where are you calling from?	
Why are you placing a bomb here?	
What is your name?	

IDENTIFYING CHARACTERISTICS

Gender	☐ Male	☐ Female	☐ Not Sure	
Estimated Age	[ ] ENTER AGE	☐ Adult	☐ Young Adult	☐ Teen
Accent	☐ English	☐ French	☐ Spanish	☐ Other
Voice	☐ Loud	☐ Soft	☐ Other	☐ Other
Speech	☐ Fast	☐ Slow	☐ Normal	☐ Other
Diction	☐ Normal	☐ Nasal	☐ Lisp	☐ Other
Manner	☐ Emotional	☐ Calm	☐ Vulgar	☐ Other

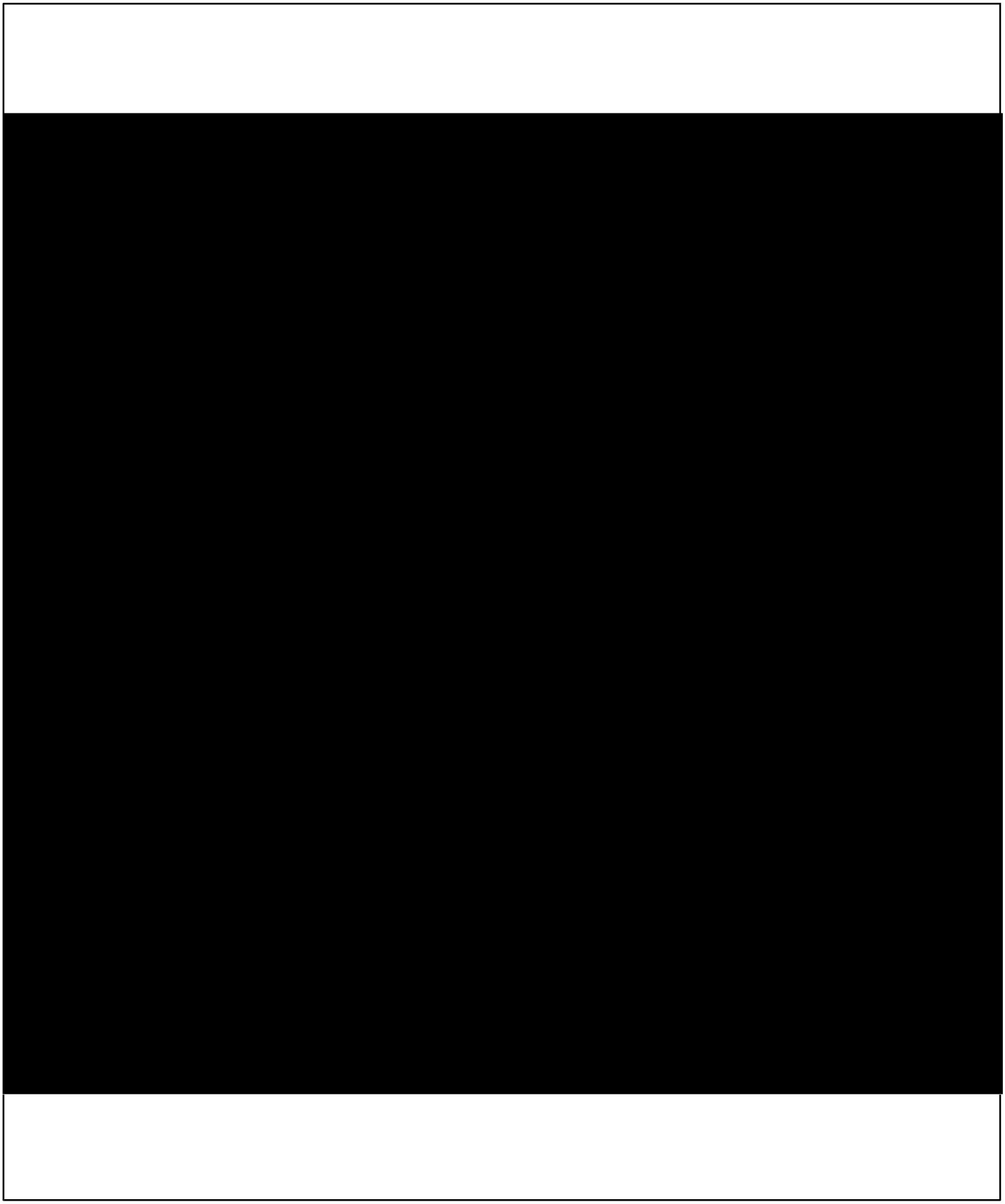
OBSERVATIONS

Background noises	
Voice was familiar (specify)	
Caller was familiar with area	

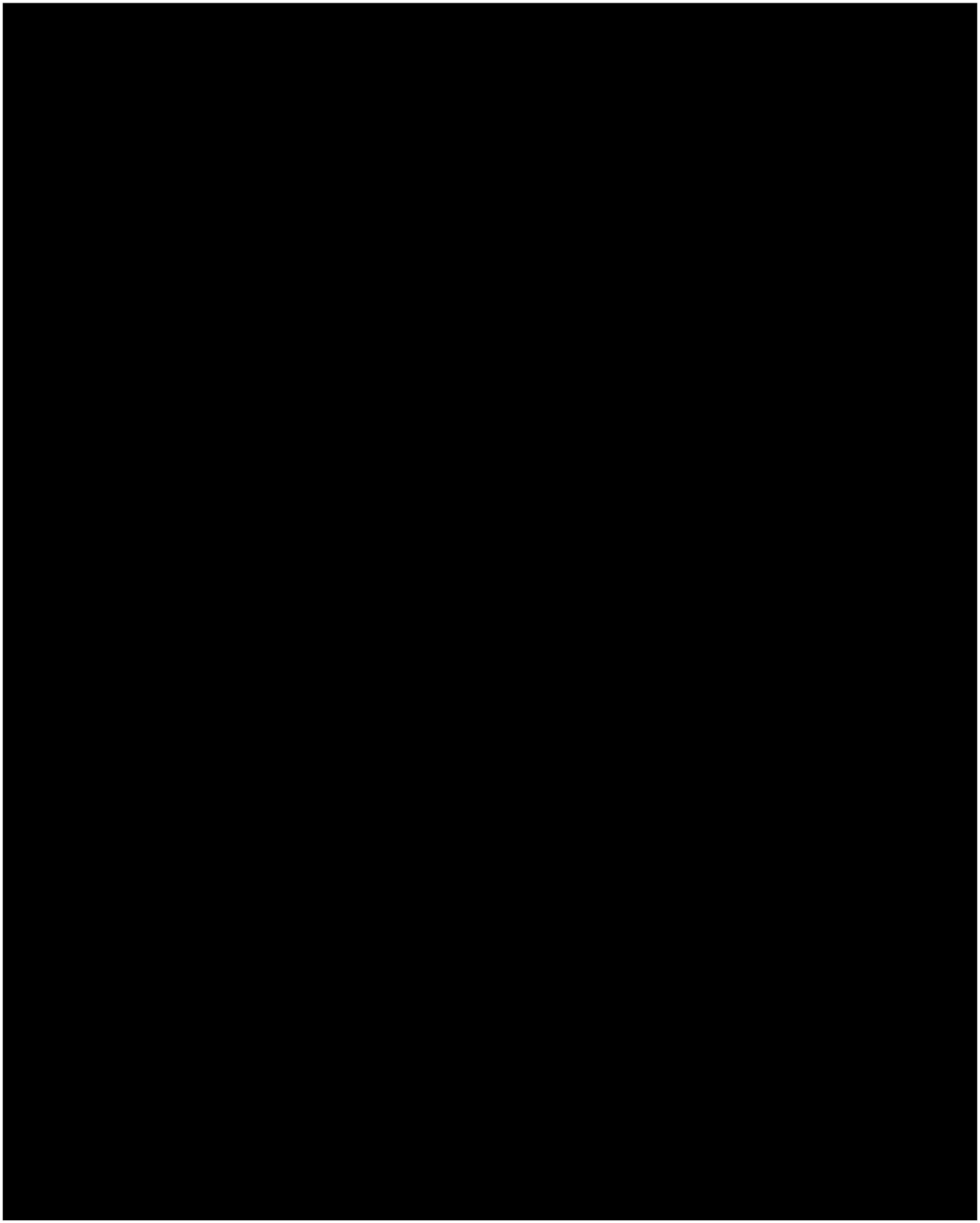
THREAT RECIPIENT'S PARTICULARS

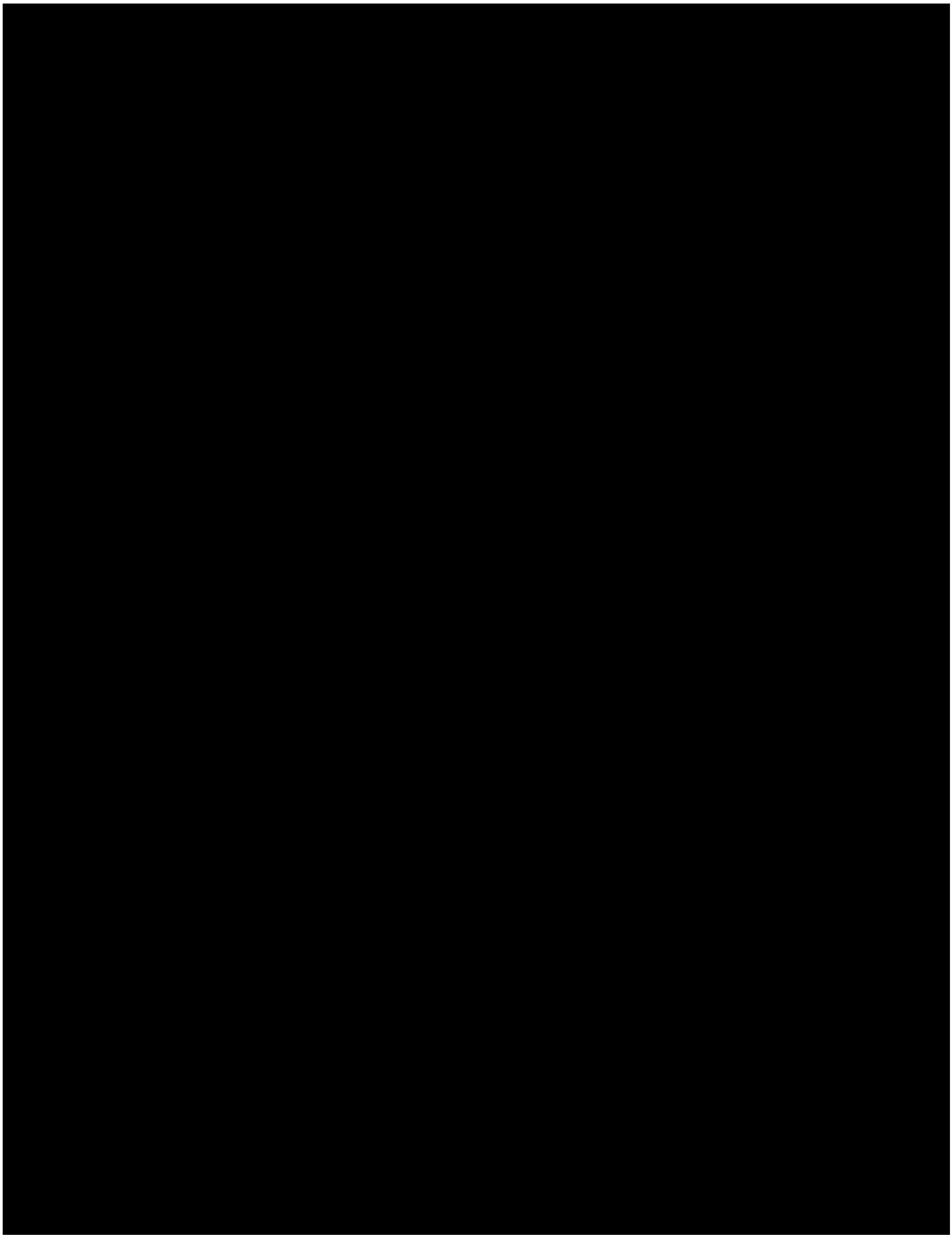
Name	Phone Number

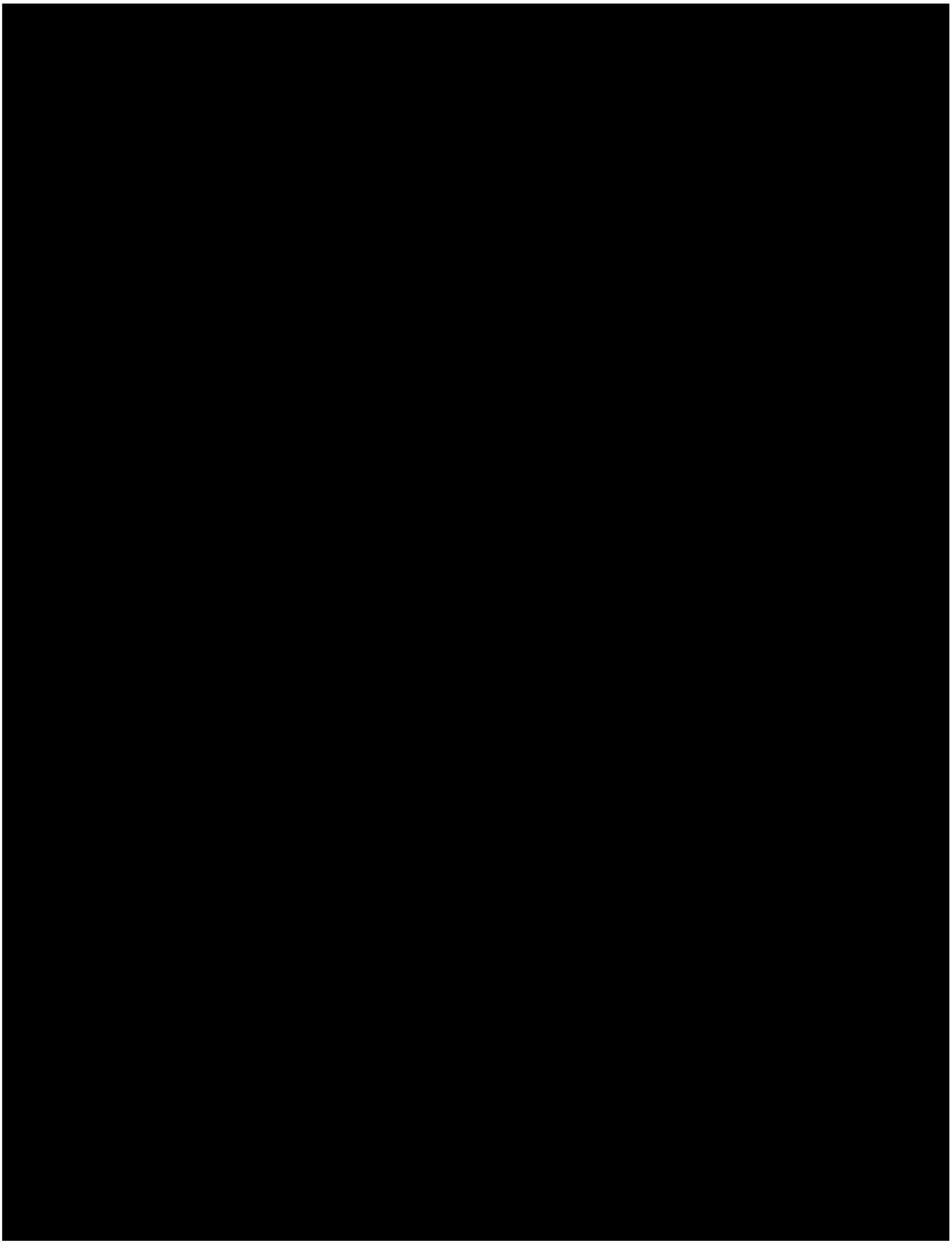
APPENDIX 4: MAP OF THE DIRECTIONS TO THE MEDICAL CARE CENTER



APPENDIX 5: GPS





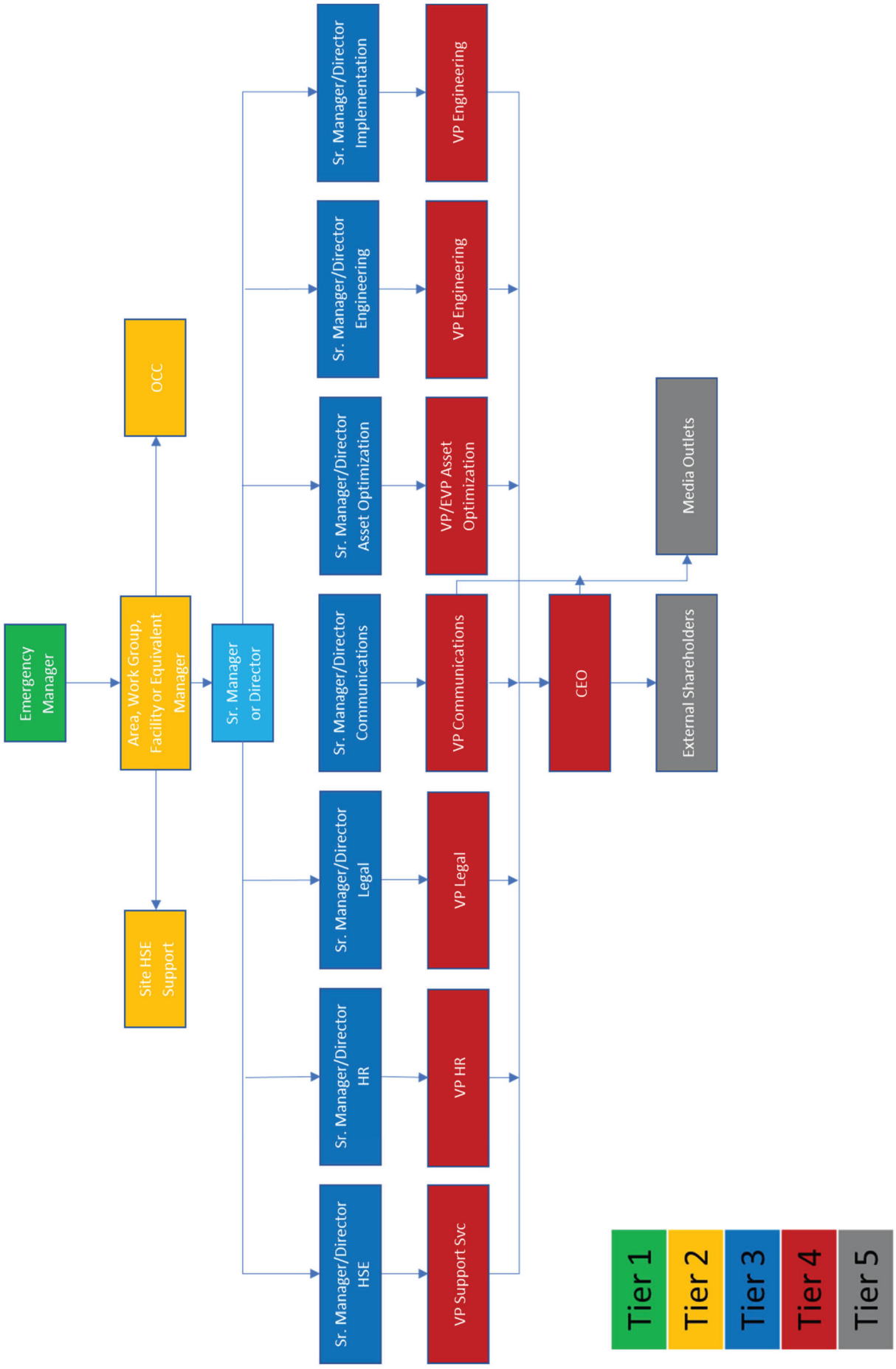


[redacted]

Equipment Number or Identifier	Latitude (N)	Longitude (W)

Equipment Number or Identifier	Latitude (N)	Longitude (W)

APPENDIX 6: EMERGENCY COMMUNICATIONS



APPENDIX 7: FIRE PREVENTION PLAN

This plan includes references to relevant EDFR-AO Work Instructions.

The FACILITY OPERATING PLAN must state the existence or lack of existence of this plan.

1. Fire Response Entities Consulted

In-person meeting postponed due to COVID-19 pandemic

Archer County- Archer City Fire Department: 911
Texas A&M Forest Service- Burkburnett, TX: 940.7213.6872

2. Weather and Fire Condition Monitoring

During fire season's (Summer, Fall and Winter) the site will include warnings in their POD about fire conditions using the USGS fire map. Site will stay up to date by turning on fire points and fire areas on Indji. Working with the local FDs on conditions will be a key factor on staying ahead of the fire season.

3. Operations Actions/Restrictions During High Fire Risk

High risk fire days will be covered in the POD (using the USGS Fire map). During these times; site mowing, driving or parking in tall grass will not be performed in the field. Mowing should be done as a preparation for the upcoming fire seasons. SM01 orders will be created for quarterly inspection of the fire prevention areas. Any work that may present a fire hazard should be kept to a minimum and shall always consist of a fire watch during this season. This would be any work that could cause a spark such as but not limited to mowing, grinding or torching. Hazards shall be identified with your JSA. STOP WORK shall be used for any reason that may present a fire hazard.

4. Defensible Space Plan

Weed abatement on all tower roads, substation, met towers, J-boxes and O&M building. Turbines and pad mount transformers have rock around the bases, substation is also all rocked. Mow around turbine and substation in Spring and Fall. Substation will have 5ft area from the rocks kept mowed all year. If a fire is started from EDF, Archer County FD have contacts for dozer's that can cut fire lines if recourse are available. Last resort would be in involve farmers in the area.

5. Site Shutdown During Active Fire or High Fire Risk

During an active fire all turbines in the area of the fire will be remotely stopped and the string will be d-energized in the substation if there is no risk involved. We have two muster points, one for tornado's and one for fires. The fire muster point is thr front gate of the O&M yard. If we need to evacuate the manager will clear the building per site plan. Once that has been completed a roll call will be taken and everyone will move to our fall back area, the Allsup's in Archer City

6. Alarm/Communication Plan

Site Manager will be notified of the fire and area of the fire. The manager will notify crews in the field to stop work and safety return to the shop or safe place. The manager will notify fire department even if the fire can be extinguished. The manager will meet and lead the FD to the area. Once FD is on-site the manager will start working through the emergency communication list and landowners. If needed the FD has multiple contacts for dozer's or whatever is available.

7. Fire Evacuation Plan

The manager will notify crews in the field to stop work and safety return to the fire mustard point or the fall back area. The fire muster point is located where the techs park across the parking lot from the O&M building and clearly marked. If we need to evacuate the manager will clear the building per site plan. Once that has been completed a roll call will be taken and everyone will move to our fall back area, the Allsup's in Archer City. Once in a safe location we will work through our emergency communication list.

8. Protection of Personnel and Equipment During Fire

All technicians should return to the fire muster point if safe to do so, roll call will then be taken to account for all personnel including contractors. Keep your sign in sheet easily assessable. When they are exiting the site, they need to stay a safe distance from the fire and up wind to ensure the fire does not block there exit. If needed crews may stop the turbines and d-energize the string(s). Manager should keep HV gear in a staging area during high fire risk seasons.

APPENDIX 8: STATE OF TEXAS REQUIREMENTS

This section applies only to those EDFR sites under construction or in operation within the State of Texas.

Emergency Water Shortage

EDFR electricity production facilities do not rely on nor require water to function. Technicians servicing these facilities require potable water for health and sanitary purposes, which is supplied by either an on-site well receiving electricity from both the on-site production as well as an emergency backup generator, or through the use of bottled water which is kept on site in large quantities (pallets).

Fuel Switching Equipment

EDFR facilities within the State of Texas do not operate on nor utilize any fuel and do not have fuel switching equipment installed.

Pandemic and Epidemic Response

Response plans for pandemic or large scale isolated illness are contained within each sites individual Business Continuity Plan.

Site Specific Emergency Events Related to Generation Equipment

Emergency shutdown procedures to be followed in the event of an emergency are contained within the turbine manufacturers work instructions and procedures.

Restoration of Service

Generation recovery and the process for doing so are very situation dependent. In general, however, bringing the substation back online, followed by individual turbine strings, and finally individual turbines shall be the order of precedent.

ATTACHMENT B

AFFIDAVIT

THE STATE OF CALIFORNIA §
§
COUNTY OF SAN DIEGO §

BEFORE ME, the undersigned authority, on this day personally appeared who swore an oath that the following facts are true:

1. My name is Tristan Grimbert. I am the President & CEO at EDF Renewables, Inc., and the highest-ranking representative, official, or officer with binding authority over Bobcat Bluff Wind Project, LLC ("Bobcat Bluff Wind"). I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of Bobcat Bluff Wind. I have personal knowledge of the matters described herein.

2. Bobcat Bluff Wind is registered with the Public Utility Commission of Texas as a power generation company. Bobcat Bluff Wind is a wholly owned subsidiary of EDF Renewables, Inc.

3. Bobcat Bluff Wind has in place an emergency operations plan (the "Plan") in accordance with 16 Texas Administrative Code ("TAC") § 25.53.

4. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Plan, and such personnel are instructed to follow the applicable portions of the Plan except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

5. The Plan has been reviewed and approved by the appropriate executives.

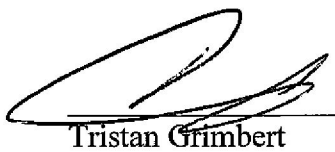
6. Bobcat Bluff Wind conducted a drill on its Plan in 2021 consistent with the requirement in 16 TAC § 25.53(f). Bobcat Bluff Wind's 2022 drill on the recently revised Plan has not yet occurred. Bobcat Bluff Wind will file a supplement in this docket upon completion of the 2022 drill.

7. The Plan or an appropriate summary has been distributed to local jurisdictions as needed.

8. Bobcat Bluff Wind maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

9. Bobcat Bluff Wind emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

FURTHER AFFIANT SAYETH NOT.



Tristan Grimbert
President & CEO
EDF Renewables, Inc.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN DIEGO)

On April 14, 2022, before me, Susie Yee Stricklin, a Notary Public, personally appeared Tristan Grimbert, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Notary's Signature

SUSIE YEE STRICKLIN
Notary Public · California
San Diego County
Commission # 2271531
My Comm. Expires Jan 13, 2023

[Notarial Seal]

ATTACHMENT C

4.3 Risk Level	Standard	Language	Country
N/A	4.7 EMERGENCY RESPONSE	EN	US/Canada/Mexico

Site Name & Address:
Street Number, City, State, County

Bobcat Bluff Wind Project [redacted]

Emergency Contacts	Contact Name	Phone Number
Site Contact - Emergency	[redacted]	[redacted]
EDF Renewables - Operations Control Center (OCC)	[redacted]	[redacted]
Site Contact - Routine	[redacted]	[redacted]
Regional Operations Manager	[redacted]	[redacted]
Site Safety Specialist	[redacted]	[redacted]
HSE Director	[redacted]	[redacted]
HSE Manager	[redacted]	[redacted]
HSE Specialist	[redacted]	[redacted]
Fire / Police / Ambulance	[redacted]	911
Emergency Response Contractor (Spills)	[redacted]	[redacted]
Client / Owner Representative	[redacted]	[redacted]
Equipment Manufacturer	[redacted]	[redacted]
EDFR Director Communications / Media	[redacted]	[redacted]
Regional Hospital or Trauma Center	United Regional	940-764-7000
Poison Call Center	Poison Control	800-222-1222
Helicopter Service	Archer City FD	911
Provincial Spill Center (Canada Only)	n/a	n/a
Ministry of Environment (MOE) (Canada)	n/a	n/a
Electrical Emergency Responder	[redacted]	[redacted]

DOCUMENT HISTORY

Rev #	R&E ID	Author	Owner Approval	Date	Update Notes
0	-	[redacted]	[redacted]	1/15/2019	New Document. Extracted from EPRP as a standalone form.
1	-	[redacted]	[redacted]	4/29/2019	Updated Canadian block to remove Ontario specific references.
2	-	[redacted]	[redacted]	3/31/2022	Updated language to meet Texas PUC requirements. Removed redundant text.

ATTACHMENT D

BUSINESS CONTINUITY PLAN

Site Level Business Continuity Plan- COVID 19

Site Name	Bobcat Bluff
Street Address	[redacted]
City, State and Zip	[redacted]

webaddress.com

VERSION 1.0

03/04/2020

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1.0		3/4/2020	Creation	[redacted]

PREPARED BY	[redacted]	**TITLE**	[redacted]	**DATE**	03/12/2020
APPROVED BY	[redacted]	**TITLE**	[redacted]	**DATE**	3-13-2020

PURPOSE STATEMENT

Contingency planning and business continuity plans are essential to employee welfare and maintaining a commercially viable corporate structure.

HSE has developed the below most likely scenarios based on guidance from the Centers for Disease Control and the World Health Organization. Recognizing that this is a rapidly evolving situation and many things are subject to change, these scenarios depict what is believed to be the escalation of response from Local, State and Federal officials to the CoVID-19 viral outbreak.

Included with each scenario are contingency planning considerations for Managers to evaluate. It is recommended that these considerations are evaluated before the situation progresses to the next scenario level.

PREVENTION AND PROTECTION

- Hand washing is the easiest form of prevention and protection. Wash hands regularly, but in particular after utilizing the restroom, after contact with public surfaces (handrails, exterior door handles, etc.) and always before eating.
- It is currently flu and respiratory disease season and the CDC recommends getting a flu vaccine (flu shot) and taking flu antivirals if prescribed.
- For people who have had close contact with someone infected with 2019-nCoV and develop symptoms, contact your healthcare provider immediately, and tell them about your symptoms and your exposure to a 2019-nCoV patient.
- For people who are ill with 2019-nCoV, follow CDC guidance on how to reduce the risk of spreading your illness to others. This guidance in on the CDC website.

Business Travel

- Travel to China is prohibited for all EDFR NA employees until public health officials deem it safe.
- Please be informed that the following measures are applicable for China (Hong Kong, Macao, Taiwan) Singapore, Korea, Iran and Italy
- Travel restrictions: any travel to these countries deemed essential must be approved by the local manager beforehand
- Any employee returning from one of these countries (even if they travel during a stop-over) must perform home-office for 14 days from the date of return to US.
- Any visitors coming from one of these countries (Even if they travel during a stop-over) must meeting remotely or re-schedule
- Report all international travel to [redacted]. HSE will provide the affected country list to [redacted] on daily basis for monitoring and evaluation.

RESPONSE

Prior to the appearance of symptoms:

- Contact your Manager by telephone if you were in China or any of the affected countries outside of the United States in the last 14 days.
- For EDFR visitors (including but not limited to business guests, interview candidates, onsite suppliers/contractors), the EDFR employee sponsoring the visitors must proactively ascertain whether the visitors have visited China or any of the affected countries outside of the United States in the past 14 days. Visitors found to have been in these countries should not be permitted within the facility. Alternate arrangements for face-to-face meetings should be made to minimize potential exposures.

- All approved visitors will be ascertained whether they have visited China or any of the affected countries outside of the United States in the past 14 days during their check-in process by Front Desk.

At the first appearance of symptoms:

- Immediately notify your Manager at the first onset of symptoms.
- Managers should encourage remote work or the use of sick time, for any employee exhibiting symptoms.
- Employees should remain outside EDFR facilities until all symptoms have been absent for 14 days.

Symptoms while at work:

- If symptoms appear while at work, immediately notify your Manager via phone, and return to your home.
- When symptoms appear at work, Managers should send those employees who work in the ill employee's immediate physical work area home. The employees closest to the ill employee are the most likely to be infected and taking the proactive step of encouraging work-from-home scenarios will prevent further transmission of the virus.
- Once an employee has been confirmed to have the coronavirus, all employees within that facility will be notified. Remote work will be encouraged until it can be determined whether other employees have become ill.
- During their absence, the ill employees work area and associated common areas will be decontaminated through the use of over-the-counter bleach or anti-septic wipes.
- ALL employees exhibiting symptoms shall receive written doctor's clearance to return to work upon resolution of the illness.
- Immediately notify your Manager at the first onset of symptoms.
- Managers should encourage remote work or the use of sick time, for any employee exhibiting symptoms.
- Employees should remain outside EDFR facilities until all symptoms have been absent for 14 days.

RECOVERY

- Containment and control processes noted above will continue until public health officials deem the outbreak contained, a cure/immunization/treatment has been announced, or there are no reports of ill employees within the facility for 14 continuous days. Once deemed safe, employees may return to work. Upon returning to work, take steps to clean and sanitize individual work areas as appropriate

SCENARIO #1 - LOCALIZED CLOSURES AND SHUTDOWNS

Examples: Daycares/Childcares close out of caution, Short-term School Closures (less than 1 week).
No ill/contaminated employees.

Likely effects:

- Short term absence from employees to tend to children
- Employees refuse to work/call in sick based on rumor and/or news reports

Considerations:

- Is temporary labor required to fill short-term needs?
- Is temporary labor available if required?
- Can employees pool resources to minimize disruptions?
- Is remote work an option, even for employees who would not normally do so?
- Does site/facility have adequate supplies on hand to sustain 2-3 weeks operation?
- Is local facility manager/ site manager aware of how to report coronavirus illnesses through his/her chain of command?
- Has facility reviewed emergency shutdown procedures in the event employees must leave rapidly due to quarantine/travel restrictions? Is this necessary for your specific operations?

List Potential Business Impacts and Risks based on considerations above:

Example: essential site personnel refuse to come in

1. Short term school closures resulting in employee children not being in school
2. Short term school closures resulting in delays to supplies making it to the site.

For each Business Impact or Risk, list mitigation action:

Example: allow work from home for individuals refusing to come in during peak period

1. Personnel may take paid leave such as vacation or sick time to tend to their children, but in the event that a family member is exposed to COVID 19 then they would be asked stay home & follow local health authorities rules.
2. At this time all employees with flu symptoms must stay home & follow local health authorities rules. With that being said, if a shortage in personnel presents itself, then we would backfill the position with a third party contractor but only in the event where the workload is not manageable by the remining active technicians on site.

For each Business Impact or Risk, list Recovery plan after event:

Example: when situation is resolved, have employee return to work after having facility sanitized by local contractor

1. Report to Area Manager. Return to normal operations. 2. Report to Area Manager. Return to normal operations

SCENARIO #2 - LARGER LOCALIZED SHUTDOWNS

Examples: Local government travel restrictions in place (travel within community permitted, travel to/from outside community discouraged), Long term school closures
No Ill/contaminated employees.

Likely Effects:

- Employees unable to travel to EDFR sites
- Difficulty in obtaining locally sourced supplies (fuel, face masks, paper products).
- Local emergency services begin to be strained

Considerations:

- Are alternate, short-term housing arrangements available to keep employees outside the travel restriction zone?
- Are alternate work schedules considered?
- Is there a manning plan in place in the event of mass employee absence?
- Is remote work available?
- In the event facility shutdown becomes necessary, who has the authority to make that decision? Who is their alternate?
- Where do employees go to get information outside their physical work site?
- Who is responsible for passing most current information on to employees concerning facility operations?
- How is the passing of information to employees accomplished and on what schedule?
- Does the party responsible for the passing of information, and their alternate, have contact information for employees?
- If facility is still operational, is there a plan to address emergencies on site when local Fire/Police/EMS services are unavailable?

List Potential Business Impacts and Risks based on considerations above:

Example: essential site personnel refuse to come in

1) Turbines and/or BOP equipment will not get repaired or serviced in a timely manner.
2) Complience inspections may be unable to be completed, or at a mininum delayed.
3) Turbines experience extended downtimes due to lack of manpower.
4) Delivery's are unable to be offloaded at the warehouse causing delayed delivery in parts and tooling.

For each Business Impact or Risk, list mitigation action:

Example: allow work from home for individuals refusing to come in during peak period

1) Remote monitoring will occur by the EDF OCC and the the GE ROC, and from site personnel. Turbines will be evaluated/troubleshooted to the extent possible remotely, with turbines being remotely reset when poss ble.
2) If necessary, additional resources can be obtained through local contractors and neighboring Vestas sites. All additional site personnel/contractors will be required to go through both EDF and GE orientation with items specific to Covid-19 addressed.
3) Reduce/postpone high risk activities when possible, and be prepared to use internal transportation to transport injured or ill persons to local area hospitals.
4) additional cleaning and disinfectant to occur in high traffic areas, reduce large personnel gathering and try to maintain 6ft separations.

For each Business Impact or Risk, list Recovery plan after event:

Example: when situation is resolved, have employee return to work after having facility sanitized by local contractor

1) repairs and service/inspection schedule will be reevaluated with adjustments made to priority items.

SCENARIO #3 - MANDATORY QUARANTINES AT LOCAL LEVEL

Examples: Local government mandated quarantine. Local citizens required to stay home. Travel restrictions enforced by law enforcement. Curfews in place.
Confirmed ill employee at EDFR facility or confirmed family/close relation illness.

Likely Effects:

- Voluntary Facility/Office shutdown to prevent further spread of virus
- Production facilities may retain ability to be operated remotely.
- Departments where remote work has not been incorporated into work processes may see serious work slow-downs.

Considerations:

- Does facility have a fallback or remote location where operations can take place?
- Is there a plan in place to decontaminate facility when travel restrictions are lifted?
- Can work at the facility be deemed "essential" by local government allowing continued travel to facility?
- If employees are within quarantine zone but facility is not, can employees from another facility be temporarily transferred to cover manning shortages?
- Does site have an emergency plan that addresses long term loss of power, loss of telecom, and loss of security?

List Potential Business Impacts and Risks based on considerations above:
Example: essential site personnel refuse to come in

In progress

For each Business Impact or Risk, list mitigation action:
Example: allow work from home for individuals refusing to come in during peak period

In progress

For each Business Impact or Risk, list Recovery plan after event:
Example: when situation is resolved, have employee return to work after having facility sanitized by local contractor

In progress

SCENARIO #4 - MANDATORY QUARANTINES AT REGIONAL LEVEL

Examples: State or Federal government quarantines a county or region. Travel to/from the county is not permitted. Travel within quarantine zone is not permitted. Citizens shelter in place.
Confirmed multiple ill employees or confirmed multiple family/close relation illnesses.

Likely Effects:

- Sites outside the quarantine zone may be forced to shut down due to lack of manpower
- Larger supply chain shortages on essential items (fuel, food, water)
- Large scale supply chain interruptions on production items (spare parts, new deliveries)
- Disruptions to EDF internal chain of command/communications due to sporadic work schedules and connectivity.

Considerations:

- Do all employees understand their chain of command beyond their immediate manager/Sr. Manager?
- Do employees understand who to report confirmed illnesses to?
- If site/facility is still open, does it make fiscal sense to keep it operating?
- If site/facility is still open, is there a business need for it to remain so?
- Due to supply chain shortages, does it make sense to rely on emergency supplies to keep the facility functional?

List Potential Business Impacts and Risks based on considerations above:
Example: essential site personnel refuse to come in

In progress

For each Business Impact or Risk, list mitigation action:
Example: allow work from home for individuals refusing to come in during peak period

In progress

For each Business Impact or Risk, list Recovery plan after event:
Example: when situation is resolved, have employee return to work after having facility sanitized by local contractor

In progress

SCENARIO #5 - MANDATORY QUARANTINES AT STATE/FEDERAL LEVEL

Examples: State or Federal government quarantines state-size area. No travel permitted.
Confirmed large scale employee illnesses.

Likely Effects:

- No manpower to operate facilities forces involuntary shutdowns
- Ability to remotely operate production facilities is lost
- Work groups wholly/majorly contained within quarantine zone lose any ability to produce even with remote work options.
- Ability to communicate with individual employees within quarantine zone significantly hampered/lost by telecommunications network overloads.

Considerations:

- Has facility been safely shut down?
- Can shutdown be remotely accomplished?
- Is there a plan in place to transfer operational authority outside the quarantine zone?
- Are facilities outside the quarantine zone effected by the quarantine?
- Can facilities outside the quarantine zone absorb the workload?

List Potential Business Impacts and Risks based on considerations above:

Example: essential site personnel refuse to come in

In progress

For each Business Impact or Risk, list mitigation action:

Example: allow work from home for individuals refusing to come in during peak period

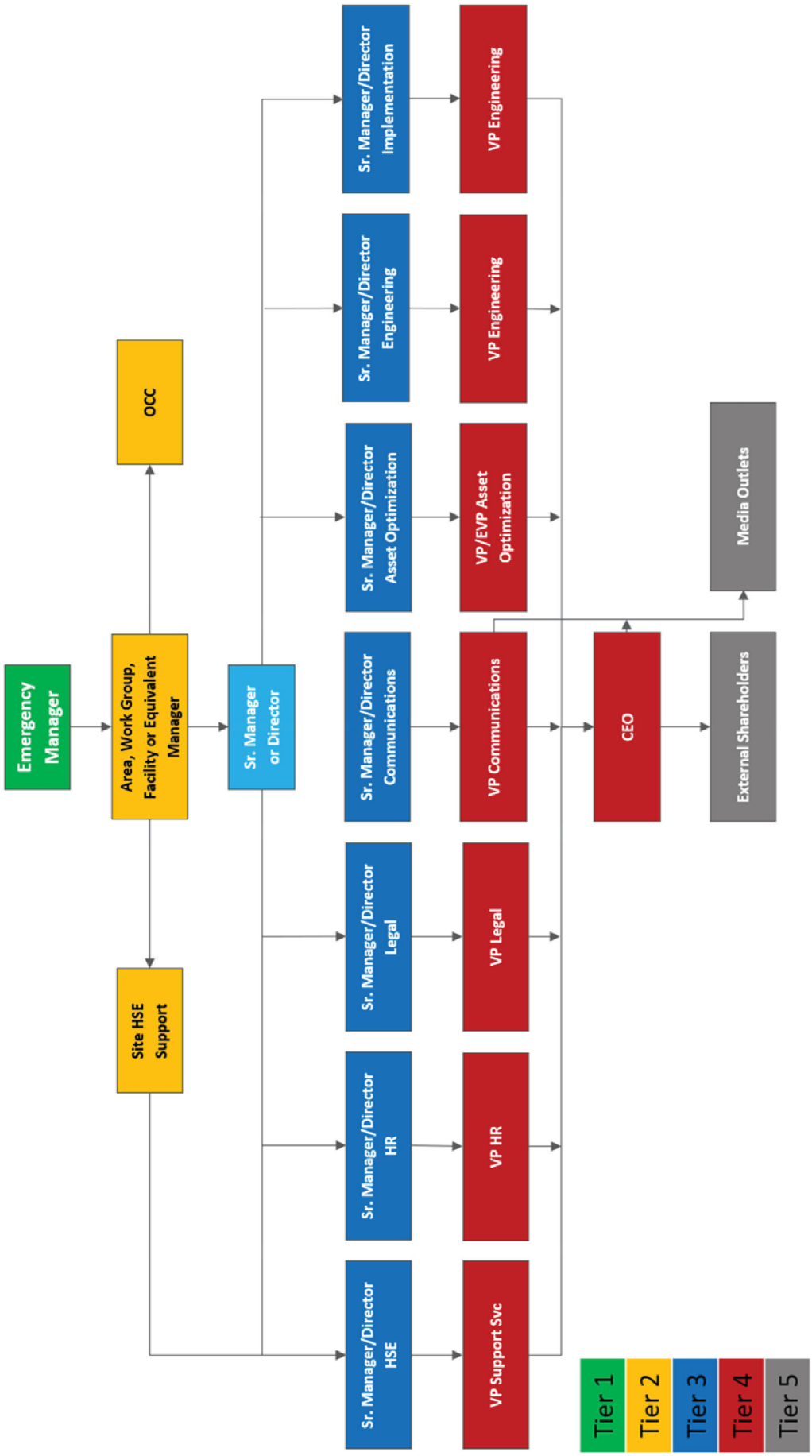
In progress

For each Business Impact or Risk, list Recovery plan after event:

Example: when situation is resolved, have employee return to work after having facility sanitized by local contractor

In progress

APPENDIX A: COMMUNICATION SRATEGY



APPENDIX B: SITE ROLES

Example: Site Manager-activate plan, communicate to site team current status and expectations, developments, make calls regarding plan operations, activate communications to leadership as needed, etc.

Business Coordinator-maintain contact list and ensure up to date, provide assistance to site manager as needed, etc.

Site Manager:
Owns plan and revisions.
Ensures that team understands the plan.
Verifies the plan is up to date during the monthly facility inspection.
Verifies the plan is up to date as we move from one scenario to the next.
Updates the plan as needed.
Shares updates with the team and management as they are made.
Activates plan as needed.
Communicates activation to the team and up the chain.
Provides daily communications to the team in any of the 5 scenarios.

Lead Technician:
Is the back up for communications if the Site manager is unreachable.

Area Manager/Business Coordinator:
Informs Site Manager of any chages that affect the plan from Corporate or HSE.

APPENDIX C: SITE CONTACTS

Example:

Site Manager Name:

Site Manger Cell number:

ATTACHMENT E

EDF renewables

IT 05-PR0170 Incident Response Procedure

Procedure Approval

The original printed and signed copy is maintained by the IT Governance group.

[redacted]	Director, Operational Technologies
Name	Role
[redacted]	Dec 29, 2020
Signature	Date
[redacted]	Director, IT Operations
Name	Role
[redacted]	Dec 29, 2020
Signature	Date
[redacted]	Sr. Director, Enterprise Applications & Governance
Name	Role
[redacted]	Dec 29, 2020
Signature	Date
[redacted]	Director, NERC Compliance Services Group
Name	Role
[redacted]	Dec 29, 2020
Signature	Date

Version History

Previous versions are maintained within the ECRM site.

Ver	Effective Date	Description of Change(s)
1.0	30 Jun 2016	Initial release.
1.0	31 Mar 2017	Converted from process to procedure format and baselined at 1.0. Reference Information Table: Added IT 05-PO0030 Cyber Security Management Controls Policy Section 2.2: Added bullet specifying medium and low impact sites. Removed EACMS and PACS. Section 4.0: Incorporated from IT 05-DC0005 Incident Response Roles and Responsibilities Section 5.0: Added definition of adverse event; modified definitions of event and incident Section 3.2: Clarified annual training applies to medium impact Section 3.3: Bullet 4 updated to include reporting from NERC low impact facilities as an input to the IR Process Section 3.9: Removed references RCA, Lessons Learned and Incident Report forms Section 3.9.5: Added low impact periodicity. Specified that IR Coordinator will ensure IR documentation updates are communicated. Section 3.10: Specified IR Control Owner maintains email DL of IR personnel Section 3.11: Added LI periodicity. Revised wording for clarity. Section 3.13.1 – 3.13.4: Revised flowcharts. Section 4: Added Application Owner and Control Owner roles Appendix A: Removed RCIS. Appendix B: Incorporated from IT 05-PR0121 Cyber Security Incident Handling Procedure. Removed all references to Plan of Action and Milestones (POAM). Minor verbiage and grammatical updates throughout document. Updated document template. *Authors:* [redacted]
2.0	11 Dec 2017	Add reference to Attestation of no Reportable Cyber Security Incidents used as evidence for compliance reporting. Consolidate and streamline the information and process flows. Incorporate content from IT 05-DC0003 Incident Response Events and Responders. Authors: [redacted] Admin change 28 Dec 2017 (approval not required): • Added reference to NERC Glossary *Author:* [redacted]
3.0	23 Feb 2018	Minor verbiage changes to clarify intent. Personnel titles updated to match actual org titles. Phone numbers and contact information updated. Updated Incident Manager responsibilities so timeline coincides with procedure. Updated call order in Appendix G. *Author:* [redacted] Admin changes 7 Nov 2018 (approval not required): Update branding *Author:* [redacted]

Ver	Effective Date	Description of Change(s)
4.0	25 Nov 2019	Revised the document to separate Process information from Procedure information. The Process information is now in an updated Process document. Revised the Incident Response Flow Diagram (Appendix A in this draft) with input from several teams.
5.0	13 Feb 2020	Added the Major Incident Response Site section.
6.0	28 Feb 2020	Added reference to the Process document.
7.0	01 Jan 2021	Updated for CIP-008-6, including: • Reporting to DHS CISA • Reporting Attempts to Compromise Updated link to Major IR site. Added Appendix B flow diagram for Attempt to Compromise.

Table of Contents

Purpose

This document describes the key elements of the Incident Response (IR) Procedure for both Medium and Low Impact sites. It includes definitions, general instructions for each element, and a comprehensive flow diagram.

Detailed process information is provided in the *IT 00-PS0001 Incident Response Process* document.

Major Incident Response Site

The Major Incident Response Site provides Incident Response information, including:

- Contact information for internal resources and vendors
- Documents, workflows, forms and steps to take for a NERC-related major incident
- A task list of action items from previous major incidents, based on lessons learned and the resolution steps required to prevent those incidents from recurring

The site is located at https://edfrenew.sharepoint.com/sites/EDFREnterpriseServiceManagement/SitePages/Major-Incident-Response-Information.aspx

Definitions

The following terms are used throughout this document:

- An **Event** is a deviation from, or a failure to function according to, expected performance criteria. At the time the Event is detected, there is no determination regarding whether the deviation or failure has created a negative impact on the associated system or component. An Event can be remediated as necessary at the Service Desk or OCC level.
- An **Incident** is an Event with associated negative impact to one or more systems or components. An Incident is prioritized and remediated by IT, OT (SCADA) and CyberSec teams as required (these teams are defined elsewhere in this document).
- A **Major Incident** is an Incident that causes, or has the potential to cause, significant impact to the critical services or systems, reputation, legal compliance, regulation or security of the business.
- A **Cyber Security Incident**[1] **(CSI)** is a malicious act or suspicious event that:
  - Compromises, or was an Attempt to Compromise, the Electronic Security Perimeter (ESP) or Physical Security Perimeter (PSP), or
  - Disrupts, or was an Attempt to Disrupt, the operation of a Bulk Electrical Systems (BES) Cyber System.
- A **Reportable Cyber Security Incident**[1] is a CSI that has compromised or disrupted one or more reliability tasks of a Functional Entity (see the next definition). Only NERC-related CSIs require reporting.
- An **Attempt to Compromise** is a CSI affecting the ESP or related Electronic Access Control or Monitoring (EACMS) devices or Physical Access Control Systems (PACS) that analysis confirms was mitigated by security controls but would have had a significant

[1] As defined in the NERC Reliability Functional Model, 2019.

impact or degradation on services provided by the organization. Reporting requirements for these events will be scoped in a manner that provides meaningful insight into cybersecurity risks posed by asserted campaigns from Advanced Persistent Threat (APT) groups or known adversaries. This includes adverse events that generate alerts or were discovered through log analysis. External probing events (e.g., reconnaissance scanning, password spraying, brute force attempts) and non-interactive CSIs are not considered in scope.

- A **Functional Entity**[1] (renamed from **Responsible Entity**) is an organization that carries out the Tasks within a Function (see the next definition).
- A **Function**[1] is one of a set of tasks that must be performed to ensure the reliability of the Bulk Electric System (BES).
- The **Service Owner** is the IT manager of the primary service affected by a Major Incident. The Service Owner might also be named as the Incident Response Manager (IR Manager) during a Major Incident.
- The **Incident Response Manager (IR Manager)** oversees the Communications during an Incident. This includes sending the template emails, initiating the phone bridge, and opening the IR Ticket. The IR Manager may assign any or all of these tasks to one or more delegates. The IR Manager is also responsible for declaring when an Incident is a Major Incident, a Cyber Security Incident, and a Reportable Cyber Security Incident.
- **OT** is the Operational Technology team at EDFR. "OT" and "SCADA" are used interchangeably in this document.
- **SCADA** is the Supervisory Control And Data Acquisition team at EDFR. "SCADA" and "OT" are used interchangeably in this document.

The Procedure

Initial Discovery and Review

Step	Description
1	The initial discovery of an Event is made by an Event Responder. This person is a corporate or field employee. The initial discovery of a Cyber Incident will likely be made by the Cyber Security team (CyberSec).
2	If the Event is perceived to be outside the scope of the Event Responder's ability to handle, he/she contacts the Service Desk (if the Responder is a corporate employee) or the OCC (if the Responder is a remote site employee).
3	The Service Desk / OCC opens a Ticket (Service Desk) or Log (OCC) for the Event in their respective tool.

<table>
<tr><th>Step</th><th>Description</th></tr>
<tr><td>4</td><td>
The Service Desk / OCC assesses the Event to determine whether it is an Incident.
Based on the assessment, the Event or Incident is handled as follows:

If the Event is not an Incident, the Service Desk / OCC resolve it themselves. The IR process for all EDFR teams ends. STOP HERE.
If the Event is an Incident at a remote site that is not managed by EDFR, the remote site manager contacts the vendor who is contracted to service the site to resolve the Incident. The IR process for all EDFR teams ends. STOP HERE.
If the Event is an Incident at an EDFR corporate site or a remote site that is managed by EDFR, the Service Desk / OCC assign a Priority to the Incident of 1 through 4, in which 4 is the lowest priority and 1 is the highest. Refer to the table below.

<table>
<tr><th colspan="5">Table 1 – Incident Priority Matrix</th></tr>
<tr><td rowspan="4">IMPACT</td><td></td><td colspan="3">URGENCY</td></tr>
<tr><td></td><td>Urgency Level 1
Service Interrupted</td><td>Urgency Level 2
Service Degraded</td><td>Urgency Level 3
Service Unaffected</td></tr>
<tr><td>Impact Level 1
Enterprise-Wide
(EDFR ESP-Wide)</td><td>Priority 1 (Critical)
Target Response = Now
Target Resolution = 1 hr</td><td>Priority 2 (High)
Target Response = 1 hr
Target Resolution = 8 hrs</td><td>Priority 3 (Medium)
Target Response = 24 hrs
Target Resolution = 3 days</td></tr>
<tr><td>Impact Level 2
Multiple Users
and/or
Multiple Sites</td><td>Priority 2</td><td>Priority 3</td><td>Priority 3</td></tr>
<tr><td></td><td>Impact Level 3
Individual User</td><td>Priority 3</td><td>Priority 4
Target Response = 3 days
Target Resolution = 1 week</td><td>Priority 4</td></tr>
</table>
</td></tr>
<tr><td>5</td><td>
The Incident is handled according to its priority:

Priority 3 and 4 Incidents follow the Standard Incident Response (IR) procedure, as follows:

The Service Desk / OCC attempt to resolve the Incident.

If the Incident impacts the Electronic Security Perimeter (ESP), it is first handled by the OCC.

If the Incident is an Attempt to Compromise that affects the ESP or EACMS devices, Cybersecurity notifies E-ISAC and DHS CISA by the end of the next calendar day after determination that it was an Attempt to Compromise. If the notification contains preliminary information only, updates must be sent to E-ISAC and DHS CISA within 7 calendar days of the determination of new or changed attribute information.
If the Incident can be resolved, the OCC or appropriate responsible group does so, and then closes the ticket. The IR process for all EDFR teams ends. STOP HERE.
If they cannot resolve it, they escalate the Incident to the IT / SCADA (OT) On-call team (IT/OT).
IT/OT assesses the Incident to determine whether it is a Major Incident.

If it is not a Major Incident, IT/OT resolves it and then closes the ticket. The IR process for all EDFR teams ends. STOP HERE.
If it is a Major Incident, the Major IR Procedure is initiated. Refer to the next section, Major IR Procedure.

Priority 1 and 2 Incidents follow the Major Incident Response (IR) procedure. Refer to the next section, Major IR Procedure.

</td></tr>
</table>

Major IR Procedure

Step	Description
1	The first step is as follows: • For corporate Incidents, the Service Owner (SO) is notified. The SO might also serve as the Incident Response (IR) Manager, unless this role is assigned to someone else. • For OCC incidents or remote site Incidents involving the OCC, an OCC manager or a trained delegate within the OCC is named as the Incident Response (IR) Manager. o If the active OCC Manager is named as the IR Manager, the OCC Management responsibilities are handed off to a delegate. o If an OCC manager or trained delegate is not available, the IT SO assumes the role of IR Manager.
2	The IR Manager initiates and oversees the IR Communications Procedure, which consists of the following (for details, refer to the Major Incident Response Site): • Sending the Template Emails during the IR procedure (can be done by a delegate) • Opening the Phone Bridge (can be done by a delegate) • Opening the IR ticket (can be done by a delegate) • Declaring that the Incident is a Major Incident
3	The Phone Bridge is joined by the following parties: • The IR Manager • IT/OT • One or more members of the Cyber Security On-call team (CyberSec; optional) • One or more members of the NERC Compliance Services Group (NCSG; optional) • The Vice President of IT (IT VP; optional)
4	Throughout the Incident assessment and resolution procedure, the IR Manager or a delegate sends updated Template Emails every 30-60 minutes and as needed.
5	IT/OT assesses the Incident further. • If they believe the Incident is clearly *not* a Cyber Incident, they resolve it, and the IR Manager ends the IR Procedure. Skip to the section titled Final Step. • If they believe the Incident is *possibly* a Cyber Incident, they contact the Cyber Security On-call team (CyberSec), if CyberSec is not already on the Phone Bridge.
6	CyberSec assesses the Incident further. • If CyberSec determines that the Incident is *not* a Cyber Incident, CyberSec resolves the Incident with IT/OT, and the IR Manager ends the IR Procedure. Skip to the section titled Final Step. • If CyberSec determines that the Incident *is* a Cyber Incident, the Cyber Security Incident (CSI) Procedure is initiated. Refer to the next section, Cyber Security Incident (CSI) Procedure.

Cyber Security Incident (CSI) Procedure

Step	Description
1	The IR Manager declares that the Major Incident is a Cyber Security Incident (CSI).
2	CyberSec leads the CSI resolution efforts according to the CSI Resolution Procedure, developed and maintained by CyberSec.
3	CyberSec assesses the CSI to determine whether it is a Reportable CSI. Only NERC-related CSIs require reporting. • If the CSI is *not* a Reportable CSI, CyberSec resolves it with IT/OT according to the CSI Resolution Procedure, and the IR Manager ends the IR Procedure. • If the CSI *is* a Reportable CSI, CyberSec does the following: o Notifies the IR Manager, who declares that the CSI is a Reportable CSI. o Notifies E-ISAC and DHS CISA within 60 minutes of the determination that it is a Reportable CSI. If the notification contains preliminary information only, updates must be sent to E-ISAC and DHS CISA within 7 calendar days of the determination of new or changed attribute information. o Contacts law enforcement if needed. o Works with IT/OT to continue the CSI Resolution Procedure, including performing containment and remediation procedures.
4	For CSIs at Remote Sites, the Site Manager oversees the completion of Form 5308 if needed.
5	Throughout the CSI resolution procedure, the IR Manager or a delegate sends updated Template Emails every 30-60 minutes and as needed.
6	When the containment and remediation procedures are completed, the IR Manager ends the IR Procedure.

Post-CSI Follow-up (CSI's and Priority 1 & 2 Incidents Only)

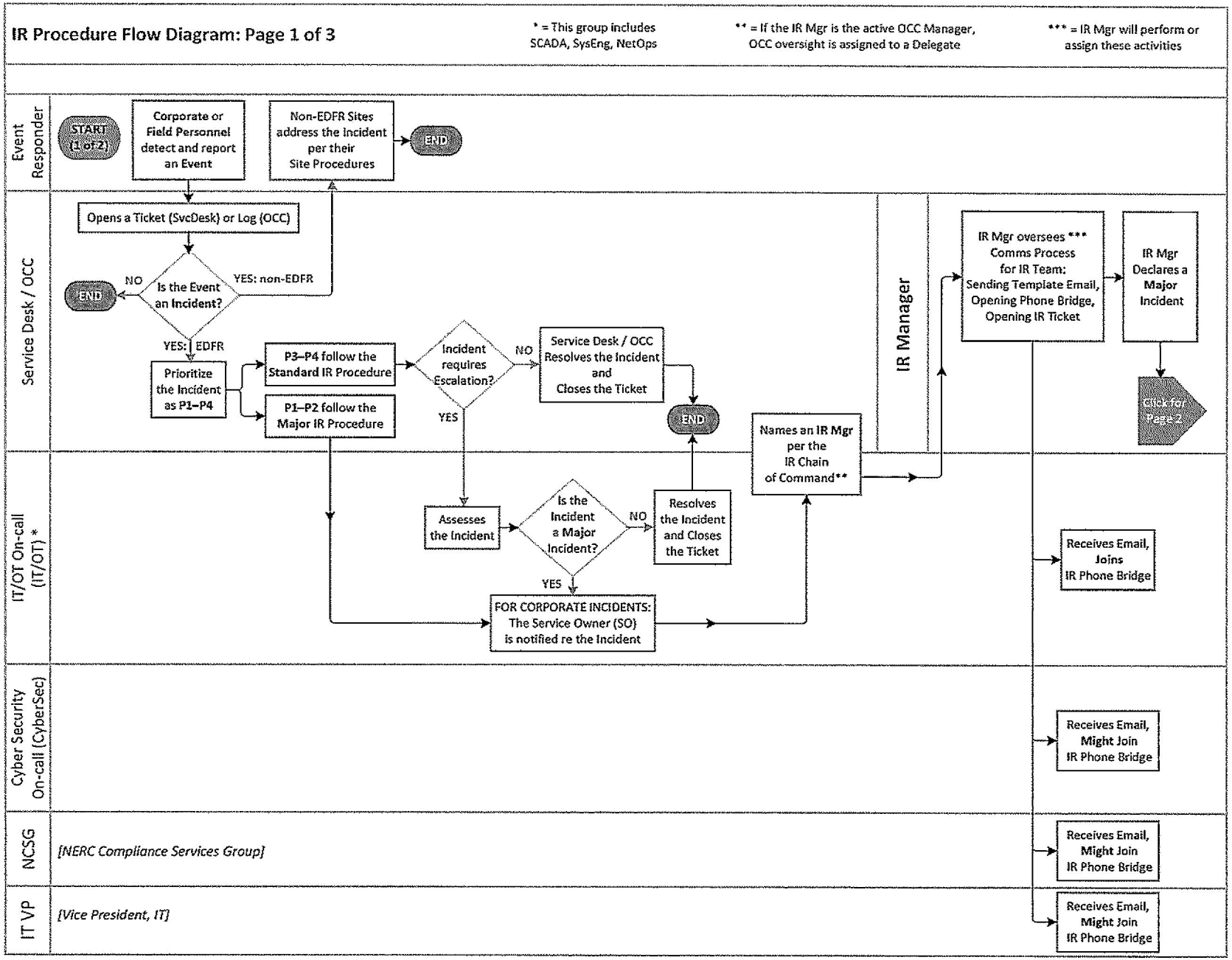
Step	Description
1	All Cyber Security Incidents (CSIs) and Priority 1 and 2 Incidents require a Post-Incident Review. The Incident Response Coordinator (IRC) works with the IR Manager, IR Team, Site Manager (if applicable), Problem Analyst, and NCSG team to complete an Incident Response Ticket (eIRT). For details, refer to the Major Incident Response Site.
2	The Service Owner (SO) and IR Team do the following: • Update the IR Procedure Document as needed, based on insights from the current Incident. • Update the IR Ticket within 180 days regarding Lessons Learned and Root Cause Analysis (RCA), which are required for all CSIs (including non-reportable CSIs). • Complete a New Incident Review (ePRB). For details, refer to the Major Incident Response Site.
3	CyberSec does the following: • Submits the timeline for the Final Report to E-ISAC and DHS CISA. • Submits the Final Report to E-ISAC and DHS CISA.

Final Step

Step	Description
1	The IR Manager closes the IR Ticket. The IR Procedure is complete.
	END

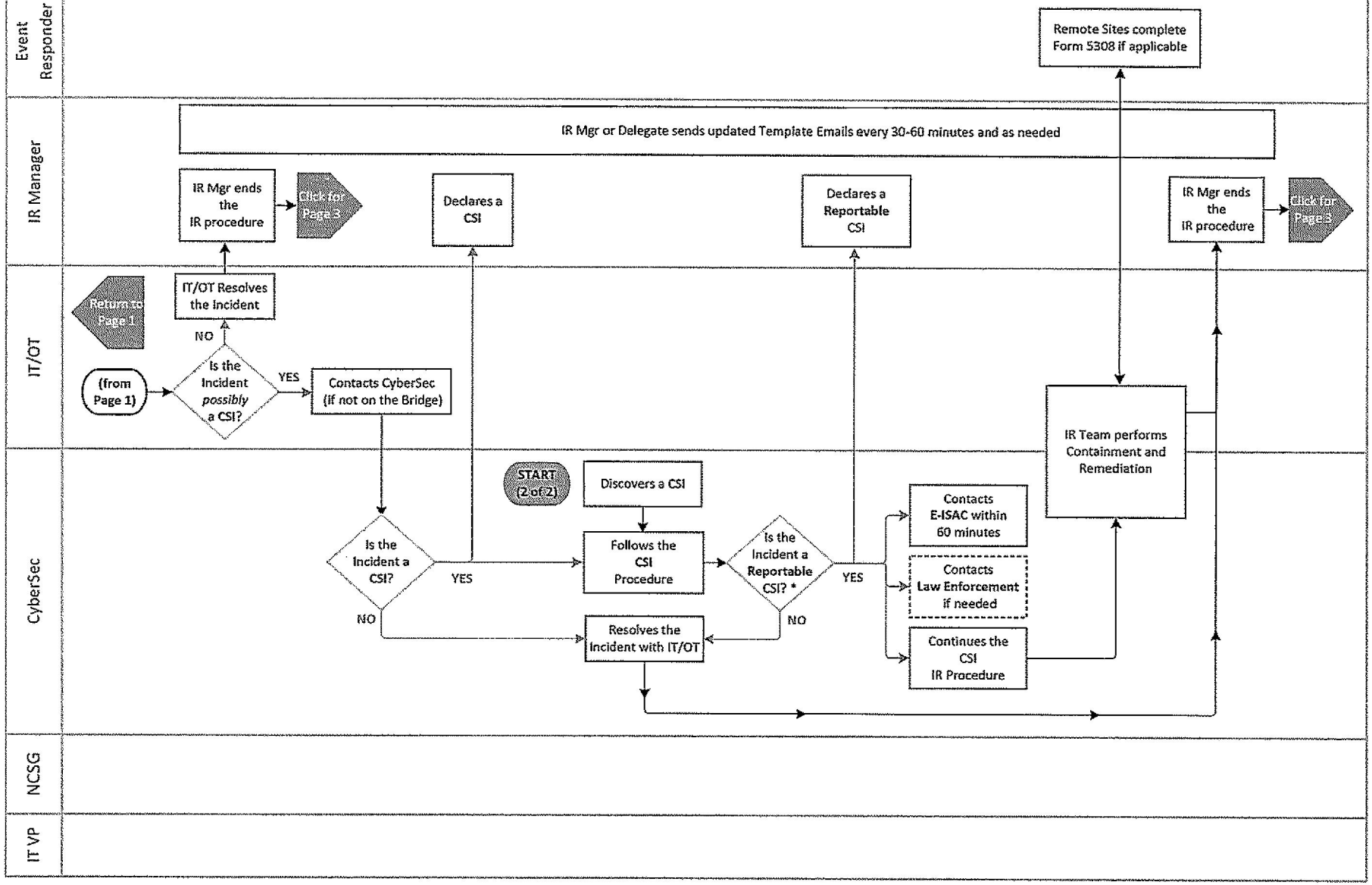
Appendix A: IR Procedure Flow Diagram

The IR Procedure Flow Diagram is shown on the following three pages:


IR Procedure Flow Diagram: Page 1 of 3
* = This group includes SCADA, SysEng, NetOps
** = If the IR Mgr is the active OCC Manager, OCC oversight is assigned to a Delegate
*** = IR Mgr will perform or assign these activities
Event Responder
START (1 of 2)
Corporate or Field Personnel detect and report an Event
Non-EDFR Sites address the incident per their Site Procedures
END
Service Desk / OCC
Opens a Ticket (SvcDesk) or Log (OCC)
Is the Event an Incident?
NO
YES: non-EDFR
END
YES: EDFR
Prioritize the Incident as P1–P4
P3–P4 follow the Standard IR Procedure
P1–P2 follow the Major IR Procedure
Incident requires Escalation?
NO
Service Desk / OCC Resolves the Incident and Closes the Ticket
END
YES
IR Manager
Names an IR Mgr per the IR Chain of Command**
IR Mgr oversees *** Comms Process for IR Team: Sending Template Email, Opening Phone Bridge, Opening IR Ticket
IR Mgr Declares a Major Incident
click for Page 2
IT/OT On-call (IT/OT) *
Assesses the Incident
Is the Incident a Major Incident?
NO
Resolves the Incident and Closes the Ticket
YES
FOR CORPORATE INCIDENTS: The Service Owner (SO) is notified re the Incident
Receives Email, Joins IR Phone Bridge
Cyber Security On-call (CyberSec)
Receives Email, Might Join IR Phone Bridge
NCSG
[NERC Compliance Services Group]
Receives Email, Might Join IR Phone Bridge
IT VP
[Vice President, IT]
Receives Email, Might Join IR Phone Bridge

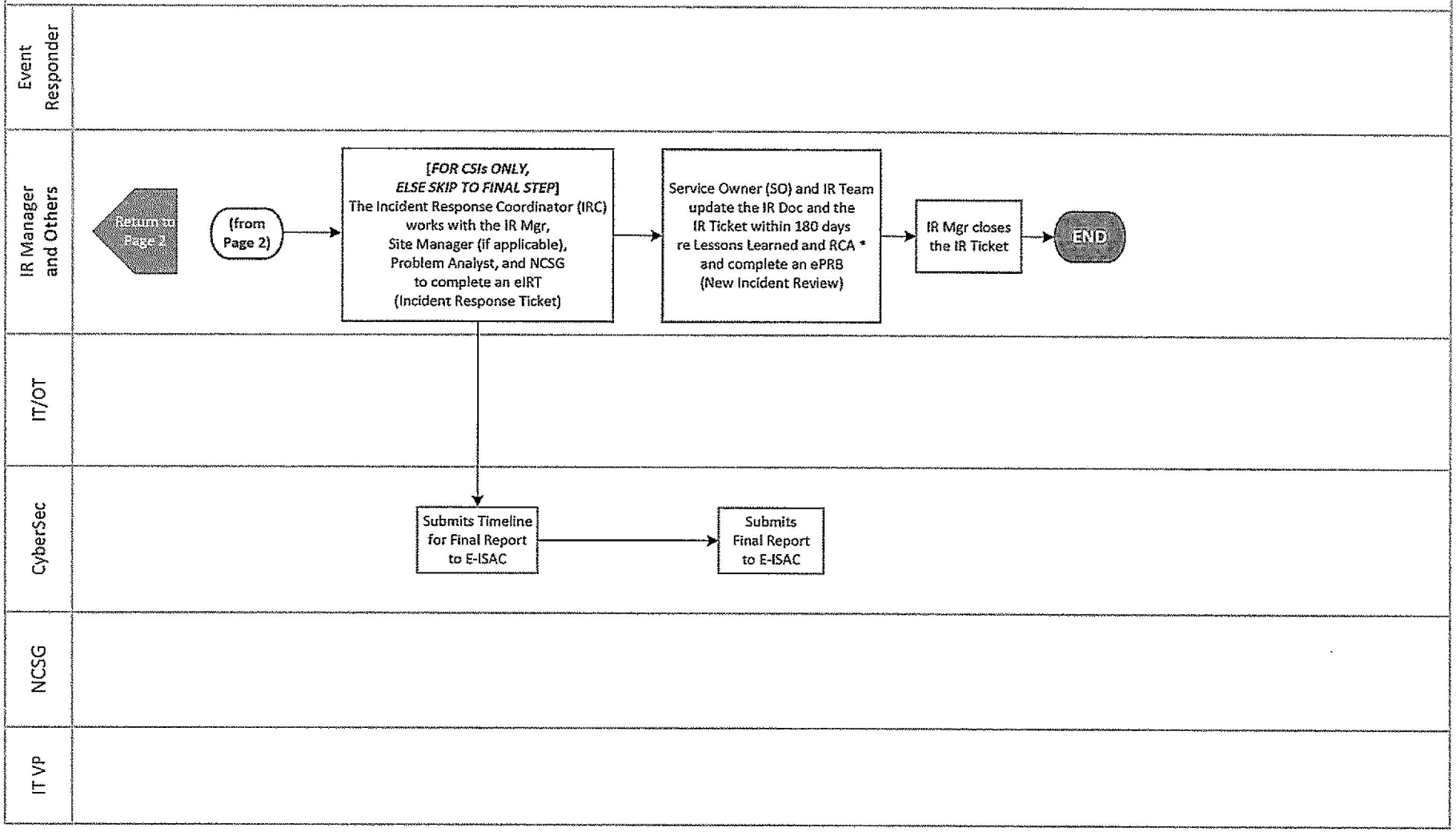
IR Procedure Flow Diagram: Page 2 of 3

* = Reporting is required for NERC-related CSIs only

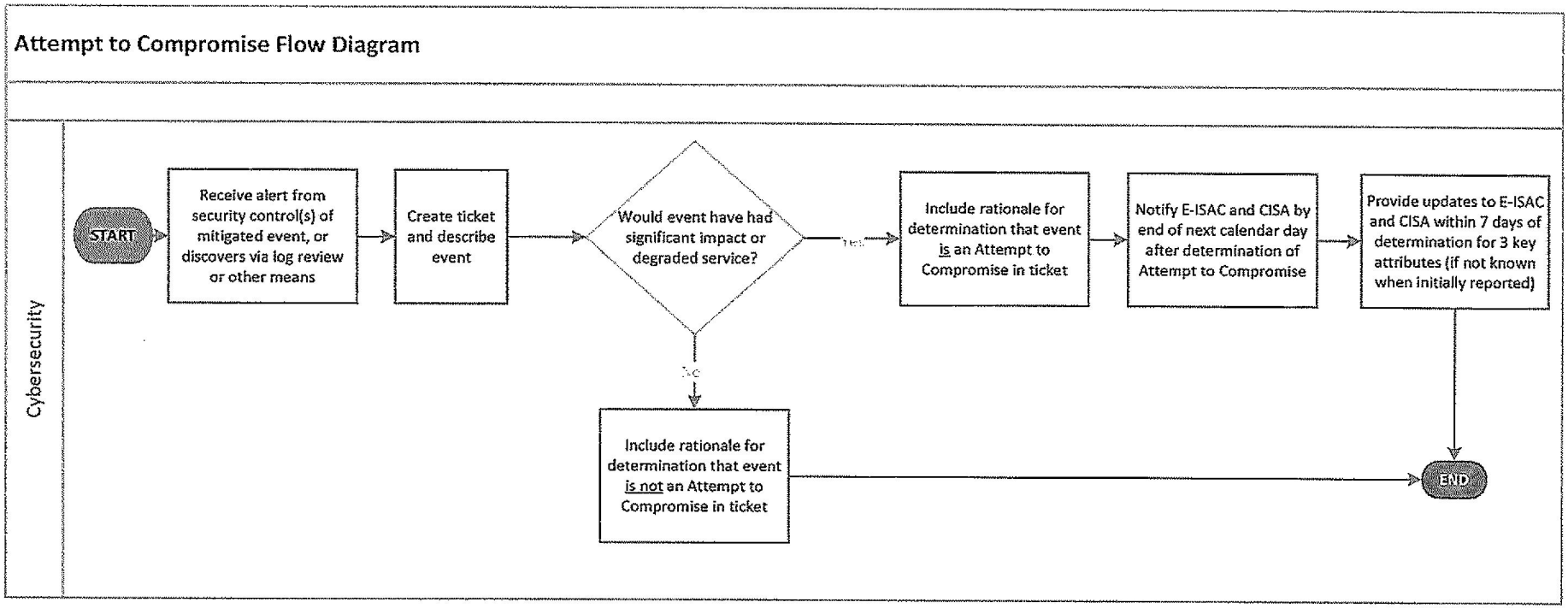


IR Procedure Flow Diagram: Page 3 of 3

* = RCA: Root Cause Analysis, required with Lessons Learned for all CSIs (including non-reportable CSIs)



Appendix B: Attempt to Compromise Flow Diagram



Incident Response Procedure_IT 05-PR0170 NERC Incident Response_Rev 07

Final Audit Report 2020-12-29

Created:	2020-12-29
By:	[redacted]
Status:	Signed
Transaction ID:	CBJCHBCAABAA6lKpm6VaFCBHIUGmFfbiHx5AuRHRODHo

"Incident Response Procedure_IT 05-PR0170 NERC Incident Response_Rev 07" History

[redacted]

[redacted]

Agreement completed.

2020-12-29 - 9:36:41 PM GMT