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 Altura  COGEN, LLC <small>A COGENTRIX Operated Company</small>	Emergency Operations Plan Odyssey Energy Altura Cogen, LLC 16 TAC §25.53	 COGENTRIX [®] ENERGY
Approved By: Jeff Pippin, General Manager	Effective Date: 4/15/2022	Rev. 0

Revision History

Rev. No.	Date	Action
0	4/11/2022	Implementation of PUC-T new 16 TAC §25.53

Introduction

The objective of this executive summary is to describe the contents and policies included in the Emergency Operations Plan (EOP) in place for Odyssey Energy Altura Cogen, LLC, which is registered with the Public Utility Commission of Texas under power generation company registration number 20030. Also included are references to the sections or page numbers within the EOP that correspond to the contents required under 16 Texas Administrative Code (TAC) § 25.53 and a confidential record of distribution and emergency contact list.

The Odyssey Energy Altura Cogen, LLC facility (Altura Cogen) is a combined cycle cogeneration facility located in Channelview, Texas within the LyondellBasell CVO Channelview Facility (Lyondell CVO). The rated capacity of Altura Cogen is 600 MW. Altura Cogen is interconnected with the ERCOT electrical grid through facilities owned and operated by CenterPoint Energy.

Cogentrix Energy Power Management, LLC (“Cogentrix”) and its subsidiary, Odyssey Operating Services, LLC, provide asset management, operations, and maintenance services for Altura Cogen.

Approval and Implementation



This section addresses the requirements of 16 TAC § 25.53(d) and provides information regarding the implementation and maintenance of the Altura Cogen EOP, revisions to the EOP, and the currentness of the EOP on file with the PUC.

Reference: pages 1-2

Communication

The communication plan for Altura Cogen includes procedures for communicating with the media, the Public Utility Commission of Texas, the Office of Public Utility Counsel, natural gas suppliers, the appropriate local and state governmental entities, officials, and emergency operations centers, and ERCOT. It also addresses communications with personnel at Lyondell CVO.

Reference: page 2

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Operations Relevant Across Emergency Types

This section of the EOP addresses common operational functions that are relevant across emergency types. Altura Cogen maintains a facility-specific plan that addresses maintaining pre-identified supplies, staffing, and site safety, including shelter-in-place procedures. Altura Cogen also follows the emergency response procedures applicable to all facilities located within the Lyondell CVO, which are incorporated into the EOP.

Reference: pages 5-17, 23-26, LyondellBasell Channelview Emergency Action Plan

Identification of Weather-Related Hazards and EOP Activation

Because of its close physical proximity to, and operational relationship with, Lyondell CVO, Altura Cogen has adopted the procedures for identifying weather-related hazards used by Lyondell CVO. This promotes a coordinated response to weather-related hazards with the adjacent facilities. The facility-specific plan for Altura Cogen differentiates between minor and major emergencies, with Altura Cogen personnel handling minor emergencies and the LyondellBasell Emergency Response Team handling major emergencies.

Reference: pages 5-8, LyondellBasell Channelview Emergency Action Plan

Restoration of Service



This annex provide procedures for assessing the cause of an outage in order to coordinate a safe and efficient restoration of service. It also establishes priorities for restoring service after a total plant electrical outage caused by a threat or hazard.

Reference: Annex VIII Restoration of Service

Water Shortage

All water used in the generation of electricity is supplied from Lyondell CVO. As such, the procedures in this annex are tied directly to Lyondell CVO's procedures, which include both onsite water storage capacity and procedures for prolonged water outages. This annex also addresses adjustments to Altura Cogen operations in the event of a prolonged outage.

Reference: Annex IX Water Shortage

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Weather Emergency Annex

This annex includes operational plans specific to responding to a cold or hot weather emergency and checklists for Altura Cogen personnel to use during a cold or hot weather emergency response. Ensuring the protection of critical equipment due to sub-freezing temperatures is the primary concern in a cold weather emergency. As such, Altura Cogen’s operational plans for weatherization and other winter readiness measures that were submitted pursuant to 16 TAC § 25.55 are subsumed within this annex.

The Weather Emergency Annex does not include a verification of the adequacy and operability of fuel switching equipment. This element of the annex is not applicable because Altura Cogen does not have alternative fuel available and fuel switching equipment has not been installed.

Reference: Annex I Weather Emergency

Pandemic and Epidemic Annex

This annex identifies risk assessments for major business functions and recovery strategies for loss of key personnel during a pandemic or epidemic. To supplement, and when appropriate supplant, these procedures, Altura Cogen relies on guidance for the Center for Disease (CDC) control that is specific to the infectious disease causing the pandemic/epidemic and changes to stay current as the pandemic/epidemic progresses.

Reference: Annex II Pandemic and Epidemic



Hurricane Annex

This annex addresses procedures to prepare for a hurricane and to allow Altura Cogen to remain operational for as long as safely possible during a hurricane. It incorporates the policies addressing the specific hurricane stages followed by Lyondell CVO. The Hurricane Annex also establishes policies and operational contingencies in the event evacuation of Altura Cogen is necessary.

Reference: Annex III Hurricane

Cyber Security Annex

The cyber security annex contains procedures to protect the confidentiality, integrity, and availability of Altura Cogen systems, networks and data. It is designed to help Altura Cogen

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personnel recover operational processes after computer or network security incidents and to provide a consistent response strategy to system and network threats that put data and systems at risk.

Reference: Annex IV Cyber Security

Physical Security and Incident Annex

This annex includes policies addressing specific threats to physical security such as bomb threats and acts of sabotage or fires and flooding. It is designed to ensure a coordinated emergency response with the LyondellBasell Emergency Response and to allow for the recovery of normal operations in a timely and safe manner.

Reference: pages 18-23, Annex V Physical Security and Incident, Annex VI Bomb Threat and Sabotage, Annex VII Hazardous Waste, and Annex X Treatment for Injured Personnel

AFFIDAVIT

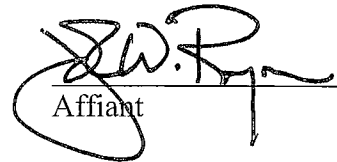
State of North Carolina
County of Mecklenburg

Before me, the undersigned authority, personally appeared John W. Ragan, who, being by me duly sworn, deposed as follows:

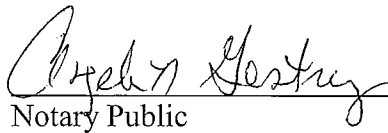
1. My name is John W. Ragan. I am President of Odyssey Energy Altura Cogen, LLC ("Altura Cogen"). I am over 18 years old, of sound mind, capable of making this affidavit, and authorized to make this affidavit. I am personally acquainted with the facts herein stated.
2. Altura Cogen is a power generation company registered with the Public Utility Commission of Texas under registration number 20030.
3. This affidavit is submitted as part of the Executive Summary of the Emergency Operations Plan (EOP) for Altura Cogen filed pursuant to 16 Texas Administrative Code § 25.53.
4. Altura Cogen's relevant operating personnel are familiar with the applicable contents and execution of the EOP. Such personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency. Altura Cogen will continue to provide training for relevant operating personnel to ensure compliance with the EOP.
5. The EOP has been reviewed and approved by the appropriate executives at Altura Cogen.
6. Altura Cogen has plans to conduct at least one drill to test the EOP and comply with the new requirement to provide written notice to PUC Staff and the appropriate TDEM District Coordinators at least 30 days in advance of the drill. A drill to test the EOP for Altura Cogen is scheduled to take place no later than June 1, 2022. The drill will include a test of the Hurricane Annex because Altura Cogen's facility is located in a hurricane evacuation zone. Altura Cogen will provide notice of the date, time, and location of the drill to PUC Staff and the appropriate TDEM District Coordinators.
7. A copy of the EOP has been distributed to local jurisdictions as needed.
8. Altura Cogen maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
9. Altura Cogen has three emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events who will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. Two of these employees have completed this training, and the third will complete this training by April 30, 2022.

Any additional emergency management personnel designated in the future will complete the required training prior to interacting with any of the designated officials during an emergency.

10. I affirm that the information submitted in this affidavit is true and accurate to the best of my knowledge and belief.


Affiant

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 12th day of April, 2022.


Notary Public

My Commission Expires: 11-19-2023

