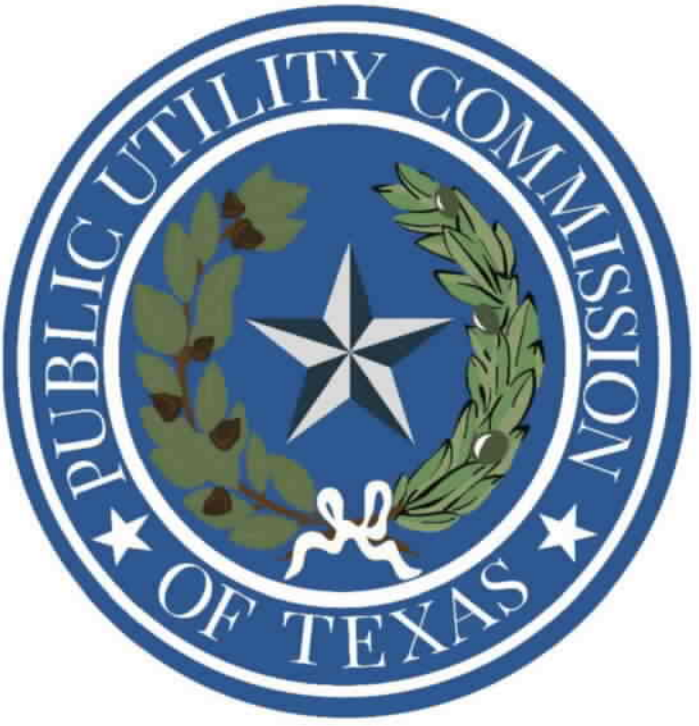

Filing Receipt

Filed Date - 2025-07-09 05:15:59 PM

Control Number - 53385

Item Number - 3710

Aggreko MSR Grid PC7 LLC

Executive Summary: Emergency Operations Plan

1. EOP Filing Requirement Mapping

EOP Filing Requirement Mapping			
16 TAC § 25.53	**Description**	**Applicable Document(s)**	**Page(s)**
(c) (1) (A) (i)	Executive Summary	Executive Summary	1-3
(c) (3)	Continuous Maintenance of EOP	Emergency Operation Plan	3
(c) (4) (A)	Record of Distribution	Executive Summary	3
(c) (4) (B)	Emergency Contacts	Emergency Operation Plan	17
(c) (4) (C)	*Signed Affidavit from Entity's Highest-Ranking Representative Affirming the Following:*	Executive Summary	4
(c) (4) (C) (i)	Relevant Personnel are Familiar With and have Received Training on the EOP	Executive Summary	4
(c) (4) (C) (ii)	Reviewed and Approved by Appropriate Executives	Executive Summary	4
(c) (4) (C) (iii)	Drills Have Been Conducted to the Extent Required	Executive Summary	4
(c) (4) (C) (iv)	Distributed to Local Jurisdictions	Executive Summary	4
(c) (4) (C) (v)	Business Continuity Plan	Executive Summary	4
(c) (4) (C) (vi)	Personnel Training (IS-100, IS- 200, IS-700, IS-800 NIMS)	Executive Summary	4
(d) (1) (A)	Approval and Implementation Section Introduction	Emergency Operation Plan	3
(d) (1) (A)	Outline of Applicability	Emergency Operation Plan	3
(d) (1) (B)	List of Individuals Responsible for Maintaining and Implementing EOP	Emergency Operation Plan	3

EOP Filing Requirement Mapping			
16 TAC § 25.53	**Description**	**Applicable Document(s)**	**Page(s)**
(d) (1) (B)	List of Individuals Who Can Change EOP	Emergency Operation Plan	3
(d) (1) (C)	Revision Control Summary	Emergency Operation Plan	3
(d) (1) (D)	Dated Statement of Approval Adopting the Plan and Superseding Previous Plan	Emergency Operation Plan	3
(d) (1) (E)	Most Recent Approval Date	Emergency Operation Plan	3
(d) (2)	Communication Plan	Emergency Operation Plan	3-4
(d) (3)	Plan to Maintain Pre-identified Supplies for Emergency Response	Emergency Operation Plan	4
(d) (4)	Staffing During Emergency Response	Emergency Operation Plan	4-5
(d) (5)	Identification of Weather-related Hazards and Activation of EOP	Emergency Operation Plan	5
(f)	Annual Drill Information	Emergency Operation Plan	5

2. EOP Filing Requirement – Generation

EOP Filing Requirement - Generation			
16 TAC § 25.53	**Description**	**Applicable Document(s)**	**Page(s)**
(e) (2) (A) (i)	Weather Emergency Annex - Operational Plans	Emergency Operation Plan	6
	Cold Weather	Emergency Operation Plan	6
	Hot Weather	Emergency Operation Plan	6-7
(e) (2) (A) (ii)	Weather Emergency Annex - Verification of Adequacy and Operability of Fuel Switching Equipment	Emergency Operation Plan	6-7
(e) (2) (A) (iii)	Weather Emergency Annex – Checklist for	Emergency Operation Plan	7

EOP Filing Requirement - Generation			
16 TAC § 25.53	**Description**	**Applicable Document(s)**	**Page(s)**
	Generation Resource Personnel to Use		
	Cold Weather	Emergency Operation Plan	6-7
	Hot Weather	Emergency Operation Plan	6-7
(e) (2) (B)	Water Shortage Annex	Emergency Operation Plan	7
(e) (2) (C)	Restoration of Service Annex	Emergency Operation Plan	7
(e) (2) (D)	Pandemic and Epidemic Annex	Emergency Operation Plan	8-9
(e) (2) (E)	Hurricane Annex	Emergency Operation Plan	9-10
(e) (2) (F)	Cyber Security Annex	Emergency Operation Plan	10
(e) (2) (G)	Physical Security Annex	Emergency Operation Plan	11

3. Record of Distribution

Record of Distribution		
Distributed To	**Date Distributed**	**Approved By**
Jerry Polacek, CEO & President	July 2, 2025	Jerry Polacek
Matthew Ordway, Chief Operating Officer	July 2, 2025	Matthew Ordway
Timothy Putnam, Asset Manager	July 2, 2025	Timothy Putnam
Bonnie Pouyanfar, Technical Asset Manager	July 2, 2025	Bonnie Pouyanfar

AFFIDAVIT

STATE OF TEXAS §
§
COUNTY OF CAMERON §

My name is Jerry Polacek and I am the CEO and authorized signatory for Aggreko MSR Grid PC7 LLC ("**PC7**"). As CEO for PC7, I affirm that I am the highest-ranking representative, official, or officer with binding authority over PC7. I am competent to testify to all the facts stated in this Affidavit and I have the authority to make this Affidavit on behalf of PC7.

I swear or affirm that in my capacity as CEO of PC7, I have personal knowledge of the facts stated in the Emergency Operation Plan (the "**EOP**") submitted to ERCOT and filed in Project No. 53385, and of the facts included in this Affidavit. The EOP contains confidential information that requires filing under seal in accordance with the Commission's rules.

Pursuant to 16 Tex. Admin. Code ("**TAC**") §25.53(c)(4)(C), I further swear and affirm that: (i) all relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been or will be conducted to the extent required by 16 TAC §25.53(f); (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) that PC7 maintains a business continuity plan that addresses returning to normal operations after disruption caused by an incident; and, (vi) PC7 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 Systems training.

I further swear or affirm the information, statements and/or representations contained in the EOP are true, complete and correct to the best of my knowledge and belief.

Signature of Affiant

Jerry Polacek

Printed or Typed Name of Affiant

SUBSCRIBED AND SWORN to before me on this 7th day of July 2025.

NILESH PATEL
Notary Public, State of Texas
Comm. Expires 12-13-2026
Notary ID 128468399

Notary Public

EMERGENCY OPERATION PLAN

aggreko

ENERGY TRANSITION SOLUTIONS

Table of Contents

1. Approval and Implementation

1.1. Introduction and Applicability

Aggreko MSR Grid PC7 LLC ("Project Company") maintains this Emergency Operations Plan ("Plan") to guide preparedness, response, and recovery activities during emergencies, natural disasters, or events involving curtailments or significant interruptions in electric service. This Plan is maintained in compliance with 16 Texas Administrative Code (TAC) § 25.53 – Electric Service Emergency Operations Plan.

The Plan applies to all operations, personnel, and facilities of Project Company involved in electric service and will be activated as appropriate in response to qualifying emergency situations. It is intended to ensure continuity of service to the greatest extent practicable and to facilitate coordination with regulatory bodies, emergency management agencies, and stakeholders.

The Plan is reviewed annually and may be tested through drills at least once each calendar year unless it is implemented in response to an actual emergency within that year. Following any activation or scheduled review, Project Company will assess the Plan's effectiveness and update it, as necessary.

A revision history is included in Section 1.3 below.

1.2. Responsibilities for Maintenance, Implementation, and Modification

The individuals listed in the table below are responsible for maintaining and implementing the Plan and, if designated, have authority to change the Plan:

Name	Title	Responsibility	Authority to Change
Matthew Ordway	Chief Operating Officer	Plan administrator	Yes
[redacted]	Technical Asset Manager	Plan administrator and implementation	Yes
[redacted]	Asset Manager	Plan administrator and implementation	Yes
[redacted]	Monitoring Team Representative	Plan implementation	No
[redacted]	O&M Team Representative	Plan implementation	No

1.3. Revision Control Summary

Revision Date	Section	Summary of Change	Inserted by (name and signature
6/27/2025	N/A	Original Plan Adoption	[redacted]

The current EOP supersedes any previous version submitted.

1.4. Revision Approval

This EOP was approved on 6/27/2025.

2. Communication Plan

In the event of a power-generating emergency, Project Company will initiate its emergency communication protocol to notify and coordinate with relevant authorities, agencies, and stakeholders as required under 16 TAC §25.53.

2.1. Emergency Communication Contacts

During an emergency, the following entities will be notified and provided with regular status updates:

- **Public Utility Commission of Texas (PUCT)**
- **Electric Reliability Council of Texas (ERCOT)**
- **Office of Public Utility Counsel (OPUC)**

- **Texas Division of Emergency Management (TDEM)**
- **Local Emergency Management and Government Officials**
  - Entities:
    - **Cameron County Office of Emergency Management**
    - **City of Brownsville Officials**

Contact information of the above-mentioned entities is in **Appendix A**. Emergency Notification Template can be found in **Appendix C**.

2.2. Complaint Handling

Project Company will log and respond to any public complaints or concerns related to the emergency. Any complaints or concerns should be directed to etsassetmanagement@aggreko.com.

3. Emergency Response Supplies Plan

3.1. Pre-Identified Emergency Supplies

Project Company will keep and maintain an onsite inventory of pre-identified emergency supplies with emphasis on readiness, weather resilience, and quick repair tools. Such a list is available in Appendix B of this document.

4. Emergency Staffing Plan

Since the site is unmanned, all emergency response staffing is coordinated through multiple contracted service providers based in the region. This plan defines the procedures for mobilizing personnel during emergency conditions to ensure a prompt and effective response once an incident affecting the system is reported.

4.1. Roles and Responsibilities

- Monitoring Team: Responsible for continuous remote monitoring of the BESS systems and any weather-related hazard. Acts as the first point of detection for any anomalies or emergency events and initiates escalation to the appropriate response teams.
- O&M Team: Responsible for the majority of on-site emergency response activities, including assessments, isolation of affected equipment, execution of emergency procedures, and coordination of repairs. They also support site access control, safety enforcement, and logistics during emergencies.
- Asset Owner Representative: Coordinates communication between all providers, regulatory agencies, and stakeholders. Ensures updates and documentation are maintained throughout the emergency response.
- Emergency Response Coordinators (ERCs): Each provider designates an ERC who acts as the single point of contact for their team during emergency response periods. ERCs collaborate to form an Emergency Coordination Group (ECG) to facilitate unified decision-making and resource allocation.

4.2. Availability and Mobilization

- Each provider maintains a 24/7 on-call rotation to respond to emergencies within their scope of responsibility.
- Response time commitment: Initial on-site presence within 24 hours of notification for all field teams.
- Contact list of primary and secondary responders is maintained and reviewed quarterly – Exhibit E.

4.3. Communication Protocol

- Emergency events are reported initially to the Monitoring Team via a dedicated phone line or monitoring system alert.

- The Monitoring Team escalates incidents to the BESS Team, O&M Team, and Asset Owner as appropriate.
- All communications during emergency events are documented and follow the protocol defined in the Communication Plan section.
- The Emergency Coordination Group (ECG) holds regular briefings during an emergency to share updates and coordinate response actions.

4.4. Drills and Training

- Annual emergency drills include coordinated participation from all providers' personnel to ensure readiness and effective collaboration.

5. Hazard Identification and EOP Activation

5.1. Identification of Weather-Related Hazards

The asset owner, in coordination with the contracted service providers, monitors weather-related risks through a combination of weather services, and site condition reports.

Hazard data sources include:

- NOAA weather alerts
- National Weather Service (NWS)
- ERCOT operational condition bulletins
- Local emergency management notifications
- On-site condition reports from O&M field technicians

More information on alert resources is available in Appendix D.

5.2. Activation Process for the EOP

The Emergency Operations Plan will be activated when:

- A material weather-related hazard threatens the continued safe or reliable operation of the BESS and associated system assets;
- There is actual material damage to infrastructure or equipment;
- A sustained outage occurs or is anticipated;
- An emergency declaration is issued by ERCOT, the Texas Division of Emergency Management (TDEM), or local authorities.

Upon activation:

- The asset owner and all contracted providers will immediately notify each other of the emergency, whichever party becomes aware first is responsible for informing the others without delay.
- The asset owner notifies the relevant provider to initiate on-site inspection or response protocols based on the nature of the emergency.
- Communication protocols outlined in Section 2 are followed to inform relevant regulatory, governmental, and utility stakeholders.
- If applicable, the appropriate annex (e.g., Weather Emergency, Wildfire, or Hurricane) is implemented.
- Activation status and actions taken are documented for post-incident review and reporting.

EOP deactivation will occur once site operations have returned to normal and any necessary restoration or repair efforts are complete.

6. Annexes

6.1. Weather Emergency Annex

I. Purpose

This annex outlines the operational response plan for cold and hot weather emergencies specific to MSR Grid PC7 facility. These procedures are designed to maintain operational continuity, protect infrastructure, and ensure preparedness. The plan is distinct from weatherization activities required under 16 TAC §25.55.

II. Operational Plan for Weather Emergencies

A. Cold Weather Emergency Response

Key concerns during cold weather include battery performance degradation, thermal management challenges, freezing of ancillary electrical components, moisture ingress, and ice buildup on site infrastructure . Emergency actions will be coordinated with the on-call operations and maintenance (O&M) service providers.

- **72–48 Hours Before Forecasted Event:**
  - Monitor National Weather Service (NWS) and ERCOT communications for cold weather advisories.
  - Providers and asset owner will discuss potential EOP activation.
  - Confirm the BESS thermal management system (heating and cooling) is fully operational to maintain battery temperature within safe operating limits.
  - Review battery state-of-charge and operational limits for cold conditions; prepare for potential derating or reduced capacity.
  - Confirm SCADA system is fully operational with live data from battery inverters, thermal management units, and transformers.
  - Ensure site access roads are open or cleared in advance of potential ice/snow.

- **During the Weather Event:**
  - Maintain remote system monitoring of battery performance, thermal management status, and alarms vis SCADA.
  - Prioritize worker safety — on-site response only if critical and road conditions permit.
  - Log all alarms, derates, or automatic shutdowns from the SCADA system.

- **Post-Event:**
  - If needed, conduct site inspection by appropriate provider(s) to check for ice damage, moisture-related faults, and signs of moisture ingress or condensation inside enclosures
  - Reboot or reset any faulted equipment per OEM guidelines.
  - Document weather impacts and operational responses.

B. Hot Weather Emergency Response

High heat can stress battery cells, reduce inverter and thermal management system performance, and increase wildfire risk due to dry vegetation.

- **72–48 Hours Before Forecasted Event:**
  - Monitor NWS heat warnings and local fire risk reports.
  - Providers and asset owner will discuss potential EOP activation.
  - Confirm all inverter fans, battery cooling systems, and thermal management units are functioning.
  - Verify battery state-of-charge and operational limits to prepare for potential derating or thermal shutdowns.
  - Confirm vegetation clearances meet fire safety standards; document if no action was needed.

- **During the Weather Event:**
  - Watch temperature-based derating, thermal management system alarms, and battery performance via SCADA.
  - Avoid routine or non-critical site visits during peak heat hours.

- Ensure all providers' teams are available and prepared to respond to thermal-related shutdowns.
- Monitor for signs of overheating or thermal runaway risk and initiate emergency protocols if necessary

- **Post-Event:**
  - If necessary, dispatch appropriate provider(s) to perform a visual inspection of battery modules, inverters, cables, and enclosures for heat stress or damage.
  - Remove any new fire risks such as wind-blown debris or dry brush.
  - Compile summary of equipment performance and site conditions.

III. Weather Emergency Checklist

Checklist Item	Cold Weather	Hot Weather
Monitor NWS & ERCOT alerts	■	■
SCADA performance and alarms reviewed	■	■
Pre-event O&M coordination	■	■
Site access reviewed	■	■
Vegetation cleared from inverters/transformers	■	■
Site inspection scheduled post-event	■	■
On-site equipment logs reviewed	■	■
Observations documented for lessons learned	■	■

IV. Lessons Learned and Updates

This annex will be reviewed and updated annually, or after any major weather event affecting operations. All changes will reflect new risks, updated procedures, or lessons learned from past responses.

6.2. Water Shortage Annex

A Water Shortage Annex is not included in this Emergency Operation Plan for the BESS because water is not required for the operation, cooling, or routine maintenance of this system. The facility uses lithium iron phosphate (LFP) battery chemistry, which is an enclosed, self-contained technology that does not rely on water-based thermal management or fire suppression systems. Additionally, this site does not conduct any vegetation management or cleaning operations that depend on water availability. Therefore, a water shortage scenario would have no operational, safety, or emergency response implications for this facility.

6.3. Restoration of Service Annex

I. Purpose

This annex outlines the procedures and responsibilities for restoring the BESS to service following an unplanned outage caused by a hazard or operational threat, such as weather events, equipment failure, or external incidents (e.g., grid curtailment or security breach).

II. Triggers for Restoration Protocol

Restoration efforts will be initiated upon any of the following:

- The facility fails to respond to dispatch signals or discharge/charge schedules.
- The system unexpectedly trips offline due to environmental, operational, or security-related causes.
- Grid signals from ERCOT or transmission operator indicate disconnection or curtailed operations.
- Safety alerts or alarms from on-site monitoring or SCADA systems indicate fault conditions.

III. Restoration Responsibilities

Monitoring Team is responsible for:

- Receiving alerts from the remote monitoring system and notify all providers and the asset owner through the established channel.

Operations and Maintenance Provider is responsible for:

- Dispatching qualified technicians to investigate and resolve faults if necessary; and,
- Coordinating with transmission operator and ERCOT for safe reconnection.

Asset owner is responsible for:

- Verifying proper incident logging and communication.
- Notifying ERCOT and applicable stakeholders if outage duration or impact requires formal reporting.
- Approving return-to-service based on field report confirmation.

IV. Restoration Procedure

1. **Remote Diagnostics**
    - Confirm outage via SCADA/monitoring platform.
    - Review BMS alarms, inverter logs, temperature profiles, state of charge (SOC), and communication systems.
2. **Field Assessment**
    - If necessary, O&M team dispatched upon owner's approval to assess physical conditions.
    - If necessary, visual inspection of any external damage, fire suppression activations, or environmental hazards.
    - Evaluate access conditions and confirm safe approach to affected areas.
3. **Corrective Actions**
    - Clear alarms in coordination with SCADA if safe to do so.
    - Replace or reset failed components in accordance with manufacturer manual and under LOTO procedures.
    - Verify cooling system performance and enclosure condition for proper operating temperature range.
4. **System Reconnection**
    - If necessary, coordinate with the interconnecting utility or grid operator before energization.
    - Confirm fault clearance and readiness to energize per BMS and EMS protocols.
    - Bring the system back online in phases if applicable and monitor stability of charge/discharge.
5. **Post-Restoration Checks**
    - Confirm SOC and voltage are within target thresholds.
    - Monitor SCADA/telemetry closely for 24–48 hours.
    - Document the root cause, resolution steps, and downtime duration.

V. Documentation and Reporting

- **Internal Reporting**: Incident reports must be filed within 24 hours of restoration for OSHA recordable events and no later than 5 business days in other instances.
- **Regulatory Reporting**: If required, notify ERCOT, the Public Utility Commission of Texas, or other entities per applicable rules.
- **Lessons Learned**: Incorporate findings into annual EOP reviews to improve future response.

6.4. Pandemic and Epidemic Annex

I. Purpose

This annex outlines the procedures and contingencies for ensuring continued safe operation, monitoring, and maintenance of the facility during a pandemic or epidemic that may restrict personnel movement, affect supply chains, or limit site access.

II. Assumptions

- The site is unmanned under normal operations.
- Operations and maintenance (O&M) are conducted by third-party provider(s).
- Remote monitoring and SCADA access remain functional.

- Personnel shortages and material delivery delays may occur.
- Travel restrictions and local/state mandates may limit on-site access.

III. Preparedness Measures

- Maintain remote access to all site performance and alarm systems.
- Confirm all staff, contractors, and vendors can perform duties within public health guidelines (e.g., vaccination policies, mask mandates).
- Establish alternative contact points with all provider(s) in case of staff turnover or illness.
- Pre-stage basic consumables and critical spare parts to reduce need for on-site visits.
- Implement virtual meeting and reporting protocols.

IV. Response Measures

1. **Remote Operations Priority**
    - Continue full site monitoring via SCADA and asset management platforms.
    - Log and track performance anomalies digitally.
2. **Essential Personnel Access**
    - Coordinate with local authorities to ensure all personnel have access credentials in case of lockdowns.
    - Maintain a list of authorized emergency personnel.
3. **On-Site Visit Protocol**
    - Require PPE (e.g., masks, gloves) and adherence to public health directives.
    - Limit on-site work to essential tasks (e.g., fault resolution, safety issues).
    - Require all visitors to self-certify absence of symptoms or recent exposure.
4. **Contractor Safety**
    - Contractors must follow CDC, OSHA, and state/local COVID-19 safety guidelines.
    - Provide advance notification of site visits to avoid overlapping between crews.

V. Recovery & Re-Entry

- Monitor guidance from CDC and Texas Department of State Health Services for changes in public health conditions.
- Resume normal field visits and non-essential maintenance when safe.
- Conduct a review of providers' performance and supply chain disruptions after the pandemic phase concludes.

VI. Documentation

- Maintain a log of all operational changes, health-related incidents, and site access during the event.
- Incorporate lessons learned into EOP updates and training plans.

6.5. Hurricane Annex

I. Purpose

This annex outlines the preparedness, response, and recover procedures for this unmanned BESS facility. It is designed to reduce risk to infrastructure, ensure situational awareness, and coordinate a safe restoration of service following hurricane-related impacts.

II. Triggers of Activation:

This annex is activated when:

- The National Weather Service issues a Tropical Storm or Hurricane Watch/Warning that includes Cameron County, TX.
- Local or state Emergency Management officials issue storm alerts or evacuation orders.
- ERCOT or the utility/transmission operator provides storm-related operational guidance or constraints.

Please see Appendix D for alerts resources.

III. Preparedness

- Ensure critical documents, site maps, and contact info are backed up and accessible remotely.
- Confirm that emergency contact signage at the site entrance is intact and legible.

IV. Pre-Storm Actions (72–24 hours prior)

- Monitoring team tracks the storm and notifies the asset owner and other providers of potential impacts.
- If necessary, the O&M provider:
    - Secure loose materials, tools, or debris that may become projectiles.
    - Suspends any planned on-site activity.
    - Confirm access routes are safe for potential post-storm entry.
    - Document pre-storm site conditions with photos (if time allows).
    - A coordination call is held between the owner and all providers to confirm responsibilities and timeline for post-storm inspection.

V. During the Storm

- No personnel are present at the site during the storm.
- The monitoring team continues to track alarms, fault conditions, and grid condition status.
- All alarms and abnormal data trends are logged and escalated per communication protocols.

VI. Post-Storm Response

- Monitoring team checks for signs of abnormal operation (e.g., voltage/frequency deviations, temperature alarms, gas leak alarms).
- If necessary, O&M provider dispatches qualified personnel when safe access is confirmed.
- Assess the integrity of BESS enclosures and vents for water or debris ingress.
- Confirm the integrity of fire suppression system.
- Inspect for signs of physical damage and document any finding.
- Coordinate with utility and regulatory agencies if interconnection is affected.
- Owner and O&M provider communicate findings and next steps.

V. Review and Recovery

- Restore systems in accordance with Annex 6.3 Restoration of Service.
- Submit incident summary and recovery timeline.
- Update this annex with any lessons learned.

6.6. Cyber Security Risk Mitigation (Non-NERC, Vendor-Managed SCADA) Annex

I. Overview

This annex outlines basic cybersecurity risks and controls for MSR Grid PC7 SCADA and remote monitoring system, which is managed through Fractal's hardware and software platforms.

II. Potential Threats

While the risk level is lower than for large, NERC-regulated utilities, potential threats include:

- Unauthorized remote access to SCADA data or controls
- Malware or ransomware affecting data integrity or availability
- Vendor system vulnerabilities or compromised credentials
- Third-party contractor access abuse
- Physical tampering with communications infrastructure

III. Controls and Mitigation

- Access Control: Only designated personnel have login credentials. MFA is enabled where available.
- Vendor Controls: Rely on Fractal's secure cloud environment, patching protocols, and SOC compliance.
- Network Segmentation: SCADA network is segmented from the business network (where applicable).
- Incident Escalation: Any cyber anomaly is escalated to the asset owner and Fractal's support team for rapid investigation.
- Contractor Oversight: Third-party vendors are only granted temporary access with oversight.
- Physical Security: Comms gear and data loggers are located in locked, monitored enclosures.

IV. Monitoring and Updates

- Regular review of user access logs
- Periodic review of Fractal's SOC reports and update notices
- Cybersecurity practices updated in response to new threats or vendor advisories

6.7. Physical Security Incident Annex

I. Purpose

This annex describes the procedures and protocols in place to prevent, respond to, and recover from physical security incidents that may affect the safety, operations, or integrity of the facility.

II. Physical Security Measures

The site is protected by a combination of physical deterrents and monitoring technologies, including:

- Perimeter fencing and locked gates to prevent unauthorized access
- Warning signage placed at key access points
- Periodic site inspections performed by the O&M service provider
- Remote monitoring systems, including cameras and SCADA alarms.
- Access logs maintained for contractors and visitors

III. Response to Physical Intrusion or Vandalism

In the event of a physical security breach or attempted vandalism:

- The O&M provider will dispatch personnel to assess and secure the site, if necessary.
- Local law enforcement will be notified immediately if a crime is suspected.
- Any damaged infrastructure or safety hazards will be addressed on an emergency basis.
- The asset owner will be notified and provided with incident documentation, including photos, incident reports, and any repair needs.

IV. Post-Incident Review

After a physical security incident:

- The root cause and points of failure will be evaluated.
- Physical security measures will be reassessed and upgraded if necessary (e.g., additional lighting, surveillance, or fencing).
- Findings may be incorporated into future staff training and emergency drill scenarios.

V. Coordination and Reporting

If the incident poses a risk to operational continuity, the appropriate regulatory bodies such as the Public Utility Commission of Texas (PUCT) may be notified depending on the severity and nature of the event.

Appendix A – Emergency Notification Information

In case of an emergency please call 911 first.

- **Public Utility Commission of Texas (PUCT)**
  - Phone: [redacted]
  - Toll-Free: [redacted]
  - Website: https://www.puc.texas.gov/agency/about/contact/

- **Electric Reliability Council of Texas (ERCOT)**
  - General Public Information: (512) 248-6800
  - Client Services: [redacted]
  - Email: [redacted]
  - Website: https://www.ercot.com/about/contact
  - ERCOT should be notified of any Unplanned Unavailability and Power Interruptions through the Service Requests application on the Market Information System (MIS).

- **Office of Public Utility Counsel (OPUC)**
  - Phone: [redacted]
  - Toll-Free: [redacted]
  - Email: [redacted]
  - Website: https://opuc.texas.gov/contact/

- **Texas Division of Emergency Management (TDEM)**
  - State Operations Center (SOC): [redacted]
  - Website: https://tdem.texas.gov/about/contact

- **Cameron County Office of Emergency Management**
  - Emergency Management Coordinator: [redacted]
  - Phone: [redacted]
  - Email: [redacted]
  - Address: [redacted]
  - Website: https://www.cameroncountytx.gov/emergency-management/

- **Brownsville Office of Emergency Management & Homeland Security**
  - Emergency Management Director: [redacted]
  - Phone: [redacted]
  - Email: [redacted]
  - Website: https://www.brownsvilletx.gov/180/Office-of-Emergency-Management-Homeland-

Appendix B – Emergency Response Supplies (BESS Facility)

In case of an emergency please call 911 first.

A. Field Technician Emergency Kits (Maintained in Service Vehicles)

- First aid kits
- Flashlights with extra batteries
- Safety vests, hard hats, gloves, and eye protection
- Arc-rated PPE for electrical and battery work
- Lockout/tagout kits
- Laminated emergency contact and procedure cards

B. Electrical & System Inspection Supplies

- Hand tools: insulated screwdrivers, pliers, torque wrenches, etc.
- Multimeters and clamp meters
- Temporary grounding equipment
- Cable ties, and weatherproof electrical tape

C. Environmental and Weather Readiness

- Portable generator (for running tools or temporary lighting)
- Weatherproof tarps and tie-downs
- Portable work lights
- Fire extinguishers (Class C – non-water)

D. Site Access & Safety Equipment

- Site keys or lock codes stored securely
- Temporary fencing or barricade tape

Appendix C – Emergency Notification Template

Emergency Notification for Generation Resource Event

To be submitted to:

- Public Utility Commission of Texas (PUCT)
- ERCOT Operations
- (Optional/As needed) Texas Division of Emergency Management (TDEM)
- (Optional) Office of Public Utility Counsel (OPUC)

Subject: Emergency Notification – [Brief Description]
Date: [MM/DD/YYYY]
Time of Incident: [HH:MM AM/PM, Central Time]
Reporting Entity: [Your Company Name]
Contact Person: [Full Name, Title]
Phone Number: [###-###-####]
Email Address: [yourname@company.com]

Affected Facility Information

- Site Name: [e.g., Pecos Solar Facility]
- Resource ID (if ERCOT-assigned): [Insert ID]
- Location: Brownsville, Texas
-
- Facility Type: Battery Storage Energy System - BESS

Description of Event

[Insert clear, concise description of the emergency]

Example:

On [date] at approximately [time], a weather-related equipment fault caused a total outage of the Pecos Solar Facility. Initial inspection indicates damage to inverter string #2 and tracker control systems due to lightning.

Cause of Emergency

- [ ] Mechanical failure
- [ ] Weather-related event (describe):
- [ ] Physical security incident
- [ ] Other (specify):

Impact on Operations

- Total MW affected: [### MW]
- Duration of outage (estimated): [## hours/days]
- Expected restoration time: [MM/DD/YYYY HH:MM AM/PM]
- Additional impacts: [e.g., risk of wildfire, hazard to personnel, risk to grid stability]

Actions Taken

[Describe immediate steps taken, e.g., O&M team dispatched, system isolated, local responders contacted.]

Coordination & Notifications

- ERCOT: [Date/time of notification, method, contact name]

- PUCT: [Date/time of notification, method, contact name]
- Other Agencies Notified: [TDEM, local officials, etc.]

Follow-up Plan

[What will be done next—inspection, repairs, update schedule, root cause analysis.]

Submitted by:
Name: _____
Title: _____
Signature: _____
Date: _____

Appendix D – Monitoring and Alert Resources

To support situational awareness and emergency response, the following monitoring and alert sources should be routinely checked by personnel responsible for site operations and compliance.

NOAA Weather Alerts

- Purpose: Nationwide alerts for severe weather, including storms, flooding, and temperature extremes.
- Website: https://www.weather.gov/alerts
- NOAA Weather Radio: Available via VHF frequencies in Texas

CALL SIGN	Site Name	Frequency	Weather Forecast Office
WWG34	Brownsville	162.550	Brownsville, TX

- Subscription Options: Email and mobile notifications via NOAA partners and apps

National Weather Service (NWS)

- Purpose: Forecasts and alerts specific to regional zones, including Cameron County.
- Local NWS Office: Brownsville, TX
- Website: https://www.weather.gov/bro
- Email/SMS Alerts Signup: https://www.weather.gov/subscribe/

ERCOT Operational Condition Bulletins

- Purpose: Alerts on grid status and conditions (e.g., Weather Watch, Emergency Energy Alerts).
- ERCOT Website: https://www.ercot.com
- Market Notices: https://notices.ercot.com
- Email Subscriptions: Managed through the ERCOT Market Information System (MIS)

Local Emergency Management Notifications – Cameron County

- Agency: Cameron County Emergency Management
- Website: https://www.cameroncountytx.gov/emergency-management/

Local Emergency Management Notifications – Brownsville

- Agency: Brownsville Alerts
- https://www.brownsvilletx.gov/1718/Emergency-Alert-Brownsville

National Hurricane Center

- https://www.nesdis.noaa.gov/imagery/hurricanes/live-hurricane-tracker

Appendix E – Emergency Contacts

In case of an Emergency please call 911 first.

Monitoring Team

- Fractal 24/7 Recorded Line
  - [redacted]
- Fractal Director of Operations:
  - [redacted]

Operation & Maintenance Service Provider

- TruGrid / Portfolio Lead:
  - [redacted]

Asset Owner Representative:

- Technical Asset Manager:
  - [redacted]
- Asset Manager:
  - [redacted]