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PHR Holdings LLC
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

EXECUTIVE SUMMARY

For the PUC of Texas

Submitted to:

PUC of Texas, PUC Document No.: 53385
ERCOT via ERCOT MIS Service Request
Texas City Fire Department
Galveston County LEPC
Bacliff VFD

Date: 18 April 2022

1.0 EXECUTIVE SUMMARY

1.1 Description of Contents and Policies

The following Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. PHR Holdings LLC is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

1.2 Record of Submittal of EOP

PUC of Texas

Project No: 51841

Filed Under Control Number: 53385

-Redacted Version

-Unredacted Version available upon request

ERCOT

Filed via ERCOT MIS

-Unredacted Version

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1.3 Annual Updates to EOP

(Including section in Executive Summary for the purposes of tracking future changes/non-changes to the EOP; intentionally N/A given PHR Holdings LLC is submitting Version 1)

Material changes made to EOP since last Version: N/A

Updated Version Replacing EOP Submitted On (date): N/A

Description of Change: N/A

Reference Sections and Page Numbers: N/A

Record of Distribution of New EOP: N/A

Affidavit: N/A

No material changes have been made to EOP since the last Version.

Pleading Documenting Changes: N/A

Attestation: N/A

1.4 Contents and Policies

(Page numbers indicate starting page number.)

- Common Operational Functions [§25.53(d)] PAGE 5
  - As relevant across all emergency types
- Introduction to EOP and Applicability [§25.53(d)(1)] PAGE 5
  - Individuals Responsible for Maintaining and Implementing EOP PAGE 5
  - List of Individuals with Authority to Change EOP PAGE 5
  - Revision Control Summary with Applicable Dates PAGE 6
  - Current Version and Start Date PAGE 6
- Pre-Identified Supplies for Emergency Response [§25.53(d)(3)] PAGE 7
  - List of supplies to be kept available at the plant
- Staffing Plan [§25.53(d)(4)] PAGE 8

- A plan to address staffing during emergency response
- Plan to Identify Weather-Related Hazards [§25.53(d)(5)] PAGE 8
  - Including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding
- Process to active EOP after identification
- Weather Emergency Annex [as required by §25.53(e)(2)(A)]
  - Hot Weather Plan PAGE 12
  - Cold Weather Plan PAGE 11
  - Verification of Adequacy of Fuel Switching Equipment PAGE 12
  - Checklists / Lessons Learned from Past Weather Emergencies Regarding Necessary Supplies and Personnel PAGE 12
- Hurricane Annex [§25.53(e)(2)(E)] PAGE 19
  - Includes evacuation and re-entry procedures (PHR Holdings LLC is in a hurricane evacuation zone, as defined by TDEM
- Cyber Security Annex [§25.53(e)(2)(F)] PAGE 22
  - Provides written procedures on cyber security incidents
- Water Shortage Annex [§25.53(e)(2)(B)] PAGE 14
  - Addresses supply shortages of water used in generation of electricity
- Physical Security Incident Annex [§25.53(e)(2)(G)] PAGE 22
  - Addresses written procedures on dealing with physical security incidents
- Restoration of Service Annex [§25.53(e)(2)(C)] PAGE 15
  - Identifies plans intended to restore PHR Holdings LLC to service after it has failed to start or tripped offline due to a hazard or threat
- Pandemic/Endemic Annex [§25.53(e)(2)(D)] PAGE 16
  - Provides procedures in the event of a declared Pandemic/Endemic
- Communication Plan [§25.53(d)(2)] PAGE 7
  - Communication with the media, PUC, OPUC, fuel suppliers, local and state governmental entities, officials, and emergency operations centers (as appropriate), and applicable reliability coordinator
  - Training in latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training
  - Distribution of the EOP to local jurisdictions, as needed
- Business Continuity Plan [§25.53(c)(4)(C)(v)] PAGE 37
  - Demonstrates PHR Holdings LLC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident
- Drills [§25.53(f)] PAGE 7
  - Process and documentation for conducting annual drills to test this EOP. At least one annual drill must include a test of the hurricane annex

1.5 Record of Distribution [§25.53(c)(4)(A)]

Tile	Name	Date of access to and/or training on this EOP
Plant Manager	Roger Lee	4/18/2022
CRO - EHC	Jacob Webb	4/18/2022
CRO	Patrick Daly	4/18/2022
CRO	Ron Dennison	4/18/2022
CRO	Clyde Mahan	4/18/2022
IC&E Tech	Woody DeBenedictis	4/18/2022
Plant Admin	Destini Wilson	4/18/2022
OMT - EHC	Kyle Miller	4/18/2022
OMT	Ryan Moore	4/18/2022
OMT	Joel Ayala	4/18/2022
OMT	Corbin Gilbert	4/18/2022

1.6 Emergency Contacts [§25.53(c)(4)(B)]

Emergency Contact Name	Title	Phone	Email
Matt Becker	Vice President, Rockland	(713)-203-1793	matt.becker@rocklandcapital.com
Roger Lee	Plant Manager	(713) 299-2017	rlee@phrpeakers.com
JL Nelson	Operations Director	(252) 532-7327	JL.Nelson@naes.com
Precious Durousseau	Emergency Management Coordinator	(832) 525-9150	precious.durousseau@peakerpowerholdings.com

AFFIDAVIT

[as required by §25.53(c)(4)(C)]

STATE OF Texas)

COUNTY OF Montgomery)

PERSONALLY came and appeared before me, the undersigned Notary, the within named Will Zapalac, President, who is a resident of Montgomery County, State of Texas, and makes this his/her statement and Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his/her knowledge:

1) Relevant operations personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan, and such personnel have been instructed to follow the applicable portions of the Emergency Operations Plan except to the extent deviations are appropriate as the result of specific circumstances during an emergency that would warranty such deviations;

2) The Emergency Operations Plan has been reviewed and approved by the appropriate executives of the entity;

3) Due to the expeditious applicability and implementation requirements of 16 TAC Sect. 25.53, the initial drill has been scheduled to take place on May 23, 2022;

4) The Emergency Operations Plan has been distributed to local jurisdictions as needed;

5) The entity maintains a business continuity plan that addresses returning to normal operations following disruptions caused by an incident;

6) The entity's emergency management personnel who are designed to interact with local, state, and federal emergency management officials during an emergency event have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

DATED this the 18th day of April, 2022.

Will Zapalac, President

SWORN to subscribe before me, this 18th day of April, 2022.

ASTRIX PORTILLO
Notary Public, State of Texas
Comm. Expires 05-20-2024
Notary ID 129086282

NOTARY PUBLIC

My Commission Expires: 5/20/2024

PHR Holdings LLC

Emergency Operations Plan (EOP)

(Per 16 TAC Sect. 25.53)

Submitted to:

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CRO	Clyde Mahan	4/18/2022
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Plant Admin	Destini Wilson	4/18/2022
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OMT	Ryan Moore	4/18/2022
OMT	Joel Ayala	4/18/2022
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Emergency Contacts [§25.53(c)(4)(B)]

Emergency Contact Name	Title	Phone	Email
Matt Becker	Vice President, Rockland	(713)-203-1793	matt.becker@rocklandcapital.com
Roger Lee	Plant Manager	(713) 299-2017	rlee@phrpeakers.com
JL Nelson	Operations Director	(252) 532-7327	JL.Nelson@naes.com
Precious Durousseau	Emergency Management Coordinator	(832) 525-9150	precious.durousseau@peakerpowerholdings.com>

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2.0 EMERGENCY OPERATIONS PLAN (EOP)

2.1 Common Operational Functions Relevant Across Emergency Types [§25.53(d)]

Plans within this document describe the process used to report and respond to unusual events outlined in 16 TAC Sect. 25.53. Plant management will immediately review pertinent event information, perform investigations as needed and make a determination on whether further action is needed. Plant management should perform this activity as expeditiously as possible.

Should plant management determine that action is needed for events outlined in 16 TAC Sect. 25.53. The following relevant emergency operation procedures shall be made active at once. If disaster or interruption to normal business occurs Business Continuity Plans and/or recovery instruction outline in corresponding plans will be invoked.

2.2 Approval and Implementation

The following Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. PHR Holdings LLC is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

2.3 Individuals Responsible for EOP Maintenance and Changes [§25.53(d)(1)]

1. Plant Manager (or designee)

   Responsible for the maintenance and execution of this plan.

   Responsible for annual drills and ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan.

   The Plant Manager shall maintain, review, and update this Plan. Plant Manager is authrorized to make changes as necessary.

2.4 Plan Assessments

Assessments will be conducted following annual drills and actual related emergencies to assess the overall effectiveness of the Plan.

2.5 Annual Updates and Submittals

Beginning 2023, if changes were made during the previous calendar year to this Emergency Operations Plan that materially affect emergency response efforts, the Facility will update this Emergency Operations Plan accordingly, no later than March 15th, each calendar year. In addition, the Facility will submit an executive summary to the commission that:

I. describes the changes to the contents or policies contained in this EOP;
II. includes an updated reference to specific sections and page numbers of this EOP (Contents – Required Sections) that correspond with the requirements;
III. includes a record of distribution as required; and
IV. contains an affidavit as required.

In the event that no changes were made during the previous calendar year to this Emergency Operations Plan that would materially affect emergency response efforts, the Facility will, in the alternative, file the following with the commission:

I. a pleading that documents any changes to the list of emergency contacts as required;
II. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating that that entity did not make a change to its Emergency Operations Plan that materially affects how the entity would respond to an emergency; and
III. an affidavit as required.

2.6 Revision Control [§25.53(d)(1)]

This Plan shall be reviewed not less than annually to confirm all Annexes and Procedures are accurate and current

Notification to commission staff regarding changes shall be made within 30 days of changes

A revision control summary that lists the dates of each change made to the EOP since the initial filing date (April 2022) will be included.

2.7 Revision Block with Approval Dates [§25.53(d)(1)]

Rev.	Date Approved	Revision Summary	By
0	04/18/2022	Initial Submittal	JWEBB

This Emergency Operations Plan (EOP), with approval date of April 15, 2022, supercedes all previous Emergency Operations Plans.

2.8 Reporting Requirements [25.53(g)]

Upon request by the PUC commission staff during activation of the State Operations Center by Texas Division of Emergency Management (TDEM), updates will be provided on the status of operations, outages, and restoration efforts as required. Status updates will continue until incident-related outages are restored, unless otherwise notified by PUC commission staff.

The Facility will provide documentation of the event and/or lessons learned as required, if requested from PUC commission staff, by the date specified by the commission staff.

In addition, ERCOT may require information from QSEs representing Resources regarding the Resources' fuel capabilities. Requests for this type of information shall be for a time period of no more than seven days from the date of the request. The specific information that may be requested shall be defined in the Operating Guide. QSEs representing Resources shall provide the requested information in a timely manner, as defined by ERCOT at the time of the request.

2.9 Drills [§25.53(f)]

PHR Holdings LLC will conduct or participate in a minimum of one (1) drill each calendar year to test and assess the effectiveness of this Emergency Operations Plan. Following each drill, the Emergency Operations Plan will be revised as needed. If, however, PHR Holdings LLC has activated this Emergency Operations Plan in response to an actual related emergency, performance of or participation in an annual drill is not required for that calendar year.

2.9.1 Hurricane Drills

The facility operates in a hurricane evacuation zone as defined by the Texas Division of Emergency Management (TDEM) and will conduct an annual drill of the Hurricane Preparedness and Response Annex during each calendar year.

2.9.2 Drill Notices

At least 30 days prior to the date of at least one drill each calendar year, the facility will notify PUC commission staff (using the method and form prescribed by the commission) and TDEM District Coordinators (by email or other written form) of the date, time, and location of the drill.

2.10 Communication Plan[§25.53(d)(2)]

At least one employee will have received training in the following National Incident Management Training (NIMS) Courses:

- ICS-100: Introduction to the Incident Command System
- ICS-200: ICS for Single Resources and Initial Action Incidents
- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

The Emergency Management personnel trained in the above courses can provide Communications with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator.

In accordance with NAES AMP108 (Attachment A):

The Operations Director must be notified as outlined in NAES AMP108 Appendix A (Attachment B). Notification attempts should be continued until there is confirmation that the message was received. Notification can be made by phone or email, provided confirmation of receipt is obtained. Leaving a phone message without receiving confirmation of receipt does not constitute notification.

For emergency situations, the Operations Director will take responsibility for providing the subsequent internal NAES notifications as appropriate.

For non-emergency situations, the Plant Manager and Operations Director will agree on how subsequent internal notifications will be made.

Specific notification, reporting and documentation requirements for emergencies are detailed in NAES SMP-2, Emergency Response Procedure (Attachment C).

2.11 Emergency Supplies Maintenance Plan [§25.53(d)(3)]

Emergency Supplies are identified in the Hurricane Preparedness and Response Plan.

Annually, the Plant Manager of PHR Holdings LLC will ensure that adequate supplies to respond to an emergency are located onsite. Non-perishable food and bottled water are provided for site workers and supplied to the site in sufficient quantity to ensure two weeks' worth of supplies in event of emergency.

2.12 Emergency Response Staffing Plan [§25.53(d)(4)]

Staffing levels will be adjusted according to the severity of the Event.

In the event of severe weather, the Plant Manager of PHR Holdings LLC will staff the facility with personnel according to the procedures outlined in the Section 3.1 Weather Emergency Annex.

In the event of Pandemic Response, Plant Manager will determine as to whether PHR Holdings LLC will be operated either at full staffing, or reduced staffing based on the location of the outbreak.

2.13 Plan for Identifying Weather-Related Hazards [§25.53(d)(5)]

PHR Holdings LLC operations staff will conduct daily meetings (or calls) with their QSE in which, among other things, the weather forecast is reviewed along with any implications to generator availability. Additionally, PHR Holdings LLC maintains contacts registered with the TDEM to receive notices and invitations to Energy Industry Coordination Calls and receives Operating Condition Notices, Advisories, Watches and Emergency Notices from ERCOT which include information on weather conditions that may affect system reliability.

If a weather-related hazard is identified by ERCOT, TDEM or some other local news source, and is expected to impact the region, PHR Holdings LLC staff will activate the applicable weather-related procedures under the following guidelines:

- Cold Weather: PHR Holdings LLC will activate its Cold Weather Emergency Response Operational Plan if ERCOT issues an OCN for severe winter weather and/or freezing conditions that directly affect the region.
- Hot Weather: PHR Holdings LLC will activate its Hot Weather Emergency Response Operational Plant if ERCOT issues an OCN for above normal temperatures that directly affect the region.
- Hurricanes: PHR Holdings LLC will activate its Hurricane Preparedness and Response Plan per the site's Hurricane Preparedness Plan.
- Drought: Currently, groundwater is the plant's only source of water, and groundwater in the area is typically drought-resistant.

In accordance with LEPC recommendations, procedures will be based on the storm's category +1. Therefore, a tropical storm would be planned as a Category 1 hurricane, a Category 1 hurricane as a Category 2 hurricane and so on.

The National Weather Service categorizes hurricanes by intensity on a scale of 1 to 5, which includes:

Hurricane Intensity	Wind Speed	Tide Surge
Category I	74-95 mph	4-5 ft.
Category II	96-110 mph	6-8 ft.
Category III	111-130 mph	9-12 ft.
Category IV	131-155 mph	13-18 ft.
Category V	15+6+ mph	19+ ft.

3.0 ANNEXES

3.1 Weather Emergency Annex [§25.53(e)(2)(A)]

The PHR Holdings LLC Weatherization Plans, which has been prepared and is being filed with ERCOT consistent with the ERCOT Nodal Protocols and incorporated herein.

3.1.1 General Severe Weather

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

In the event of a severe weather threat, PHR Holdings LLC will implement the applicable sections of NAES Safety Manual Procedure SMP-02 Emergency Response Plan (Attachment C).

- The Plant Manager shall be notified and will try to be on-site to determine appropriate action.
- If the Plant Manager cannot be contacted, then the Plant Manager Designee shall determine the appropriate action.
- During severe thunderstorms, caution should be used during outside activities.
- If thunderstorms are in the immediate area of the plant, outside activities should be curtailed.
- The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.
- The best protection in a tornado is usually an underground area. The best above ground areas in a building are:
    - Small interior rooms on the lowest floor without windows,
    - Hallways on lowest floor away from outside doors and windows,
    - Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.

3.1.2 Cold Weather - Emergency Response Operational Plan

As required under PUCT Electric Substantive Rules & ERCOT Nodal Protocols Section 3.21, NAES Corporation and PHR Holdings LLC have prepared a weatherization plan to address measures taken to prepare for extreme winter weather events.

Routine cold weather preparation is to take place prior to the onset of the winter season. Preparation is to include an evaluation of overall plant preparedness and any equipment condition or issues that might affect plant operation in cold weather.

Refer to Winter Readiness Plan (Attachment D).

Annually, the following actions are to be taken:

1. Conduct an inspection of, including but not limited to, the following systems:
    a. Piping Insulation
    b. Heat Trace
    c. Instrumentation, Coalescing Devices, Sensing Lines, and Control Valves
    d. Lubricating and Hydraulic Systems including Heaters

e. Demin, Water Wash, and Wastewater

f. Compressed Air System including Dryers

g. Air Filtering Systems

h. Inlet Filter Housing and CDP Inlet Heating Systems

2. Note any deficiencies in freeze potential and insulation systems. Requisition repair materials and labor to effect repairs on any deficiencies identified in the inspection.

3. Inventory and restock portable heaters, spare insulation materials and materials to provide temporary wind blocks, heat sources, and insulating blankets.

4. Stage portable heaters, additional blanketing and insulation materials, and wind blocks and barriers.

5. File forms in Winterization Binder in Control Room and maintain for future records and audits.

3.1.3 Verification of Fuel Switching Equipment

During normal operations, natural gas is supplied to plant via pipeline from Kinder Morgan. PHR Holdings LLC burns pipeline quality natural gas exclusively and has no provisions for on-site storage of alternate fuels as well as no alternate supplier of fuel gas.

3.1.4 Cold Weather Emergency Response Checklists

Cold Weather Emergency Response Checklists (Attachment D, Pages 82-88) are to be reviewed annually and updated with lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

3.1.5 Hot Weather – Emergency Response Operational Plan

PHR Holdings LLC has the potential to be subject to temperatures at or above 100 deg. F. However, the units and associated equipment are designed to operate at temperatures above 100 deg. F. As with any situation, personnel safety and preservation of equipment are priority when responding to extreme weather conditions.

The Summer Readiness Procedure is to detail the steps necessary to place the plant into a Hot Weather readiness condition for operation, along with verifying that all extreme hot weather preparations and building cooling is operating correctly for the summer months. As per the Emergency Operations Plan, SOP PHR SUMMR (Attachment E) is to be completed by May 15th each year and on a monthly basis, June through October.

The following major equipment must be prepared for summer operations:

- Demineralized Water System
- Cooling Systems
- Compressed Air System
- Waste System Piping
- Lube Oil Systems – Turbine, Generator and Hydraulic

3.1.6 Hot Weather Emergency Response Checklists

Hot Weather Emergency Response Checklists are to be reviewed annually and updated with lessons learned from weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

3.2 Water Shortage Annex [§25.53(e)(2)(B)]

Currently, groundwater is the plant's only source of water and groundwater in the area is typically drought resistant. In the event of an emergency shortage of water the plant will become unavailable and will not be able to resume normal operation until water is made available.

3.3 Restoration of Service Annex [§25.53(e)(2)(C)]

[redacted]

3.4 Pandemic and Endemic Annex [§25.53(e)(2)(D)]

The purpose of NAES SMP-20 (Attachment G) is to provide a coordinated and comprehensive response to a pandemic event in order to help ensure continuation of operations.

A Pandemic is defined as "(of a disease) prevalent over a whole country or the world." An Endemic is defined as "(of a disease or condition) regularly found among particular people or in a certain area." The response plans used for an endemic would be similar to a pandemic response.

The procedure describes potential pandemic threats, identifies and prioritizes the critical operations and business functions of this facility, and provides appropriate response guidelines.

The information in this Plan is based on generally accepted assumptions about the development, outbreak, and expected progress of an influenza pandemic. Site-specific information required for implementing this Plan (contact lists, recovery details, etc.) are provided via site specific Appendices. Control and survival of a pandemic will depend on the ability of thoughtful individuals to conduct a well-planned and well-organized response. The ultimate objective of this Plan is to prepare those individuals for success.

3.4.1 Facility Staffing Plan

Once it has been determined that a pandemic outbreak is in full force, a determination will be made as to whether PHR Holdings LLC will be operated either locally or remotely based on the location of the outbreak.

If PHR Holdings LLC is operated locally, there will be limited staff available on-site (personnel totaling two or three at the most). PHR Holdings LLC can be operated remotely with no staff on-site, if it becomes necessary.

Key Personnel and Critical Skills are identified in NAES SMP-20 Tables 4 and 5.

3.4.2 Pandemic and Endemic Annex

<u>Vendor List</u>

The following list of vendors is in priority order as to those that would have the greatest and most immediate impact on the facility:

- Kinder Morgan (Fuel Manager)
- CenterPoint Energy

<u>Potential Contract Support (if required)</u>

Potential additional contractor support that may be required would primarily fall in the Technician area but could affect other areas depending on the timing of the pandemic.

- Temporary on-site Technician personnel to assist major equipment breakdowns
- High-Voltage contractor for invasive repairs
- Crane contractor for lifting process with major component repairs

3.4.3 Communications Plan

PHR Holdings LLC has a list of the employee's telephone and cell phone numbers in case of an emergency in accordance with NAES SMP-20 Appendix E – Employee Contact Information. On-site communication tools are adequate for this type of event.

If a pandemic outbreak is imminent, an effort will be made by Plant Manager or designee to collaborate with local health officials on availability of immunization shots for critical plant personnel. In addition to local bulletin boards and websites, NAES Corporate Pandemic Response Team will monitor World Health Organization (WHO) and Centers for Disease Control (CDC) websites daily for updates to potential health threats and informational broadcasts.

A communication chain will be developed so that working staff members are aware of who within the facility staff is healthy and available and who has been infected by the outbreak.

3.4.4 Security

3.4.5 Training, Drills, and Vaccinations

Training will be conducted for all staff members prior to a viral outbreak and again at the first signs of a developing pandemic. The focus of the training would be on the early symptoms of the virus, the nature of the virus (i.e., how it is spread), how long it lives on surfaces outside the body, and how to minimize the chances of being infected. The need for exceptional personal hygiene, especially hand washing, would be emphasized. Guidance would be provided, and expectations would be set on how to minimize the risk of spreading the disease. Training on vaccinations and their potential side-effects should be conducted by the medical staff administering the vaccine. After training has been completed, all staff personnel should be screened for willingness to receive the vaccine. An effort will be made by Management to obtain vaccines for critical employees.

Personnel denying receipt of the vaccination will sign a waiver documenting their training, understanding vaccine's purpose, and the potential consequences of refusal of the vaccination.

3.4.6 Critical Personnel Protective Equipment and "Clean Area"

In anticipation that Personal Protective Equipment (PPE) will become more limited and harder to obtain, the facility will stock extra amounts of appropriate PPE and made available to all personnel.

Proper sanitization of normally occupied areas and commonly used items will be followed based upon recommendations per NAES Corporate Pandemic Response Team, World Health Organization (WHO) and Centers for Disease Control (CDC).

The Control Room will be designated as a "clean area" where only essential personnel will be allowed to enter once an outbreak has been confirmed.

3.4.7 Interaction with Local Health Department

Portions of this plan may be altered impromptu in accordance with suggestions and/or mandates by either County or State Health Departments.

Contact Information:

Harris County Public Health Environmental Public Health
101 S. Richey Suite G Pasadena, TX 77506
(713) 274-6300
(713) 755-5050 (Emergency)

3.4.8 Post Pandemic Actions

Normal facility operation may be resumed once the pandemic has ended and has been verified by governmental agencies through the Local Health Department or the local Hospital/Clinic.

3.4.9 Conclusion

In the event a pandemic does take place, it will be NAES and PHR Holdings LLC primary goal to assist its employees through all challenges put forth by a pandemic.

3.5 Hurricane Preparedness and Response Annex [§25.53(e)(2)(E)]

PHR Holdings LLC has a Hurricane Preparedness procedure (Attachment F). This procedure establishes plant policy for actions during periods of severe weather during commercial operations.

This procedure provides information and outlines steps to protect personnel and equipment against the possible destruction of a hurricane and is a guideline to follow rather than a set of rigid rules. The severity, speed and expected area of landfall will determine the time that these steps will be taken. The Plant relies on the National Weather Service broadcasts for the latest changing weather conditions and the probability values for possible landfall of a tropical storm or hurricane.

3.5.1 Hurricane Category

Under the Saffir-Simpson wind Scale estimates potential property damage. Hurricanes reaching Category 3 and higher are considered major hurricanes because of their potential for significant loss of life and damage. See Table

Saffir-Simpson Wind Scale

Hurricane Category	Pressure (Inches)	Pressure (Millibars)	Wind Speed (MPH)
I	28.94 and up	> 980	74 - 95
II	28.50 - 28.91	965 - 979	96 - 110
III	27.91 - 28.47	945 - 964	111 - 130
IV	27.17 - 27.88	920 - 944	131 - 155
V	< 27.27	< 920	> 155

3.5.2 Procedure

Hurricane Season Preparation

The start of hurricane season is June 1. As part of preparing for hurricane season, the Plant shall:

- Conduct a Hurricane Preparation Drill to ensure that the Plant is prepared should a hurricane occur in the area.
- Begin closely monitoring local weather forecasts and N.O.A.A weather forecasts for early signs of tropical storm warnings.
- All employees will review the Plan, which will be discussed and registered in the May Safety Meetings signing-sheets until all personnel are accounted for.
- Maintain a hurricane tracking data log (Attachment 4).
- Ensure that the items listed for the Hurricane Kit (Attachment 2) are available. If not available, place order to complete the kit.
- Check condition of Plant roads and initiate repairs as needed.
- Check employee rain gear supplies.

- Check condition of doors, windows and compartment/building doors and initiate repairs as needed.
- Check condition of telephone and radio systems and initiate repairs as needed.
- Check first aid kits (Attachment 3) and restock if necessary.
- Check conditions of portable and stationary sump pumps and repair if necessary

Hurricane Watch

A tropical storm/hurricane has formed and has entered the Gulf of Mexico and has become a potential threat to the immediate area within 36 hours.

- Check schedule for available duty personnel and notify those people to maintain their readiness for call out (i.e., bedding, change of clothes, personal hygiene items, medications, special dietary needs, etc.).
- Prepare emergency food supply.
- Check supply of treatment chemicals and all calibration gases; order as needed.
- Move mobile equipment to safe area to be tied down if it becomes necessary.
- Ensure that plant truck and utility vehicles are fueled.
- Pick up and secure all loose objects throughout the sites.
- Collect all exposed fire extinguishers, etc. and place them inside a secure enclosure.
- Secure all doors and windows on all buildings, skids and turbine compartments.
- Distribute tarps and rope, as needed, in control room, electronics room and switchgear enclosures.
- Tie down all compressed gas bottles.
- Secure all instrument and electrical junction box covers.
- Empty all trash receptacles and place them indoors. If possible, move trash dumpster into storage building area.
- Ensure transformer pit drains are open.
- Top off all tanks.

Hurricane Warning

A warning has been issued by the National Weather Service that sustained winds of 64 knots (74 mph) or greater, associated with a hurricane, are expected in a specified coastal area in 24 hours or less.

- The Plant Manager will decide whether and when to shut down the Plant and send employees home.
- If Plant will close, shut down all units utilizing shutdown procedures.
- Review section 5.2 and walk down plant to ensure all items have been completed.
- Control Room Operator will continue to monitor the progression of the storm and will continually update the Plant Manager.
- Transfer predetermined files to the chosen safe location. Back-up computers files onto discs and remove discs to safe location.
- Cover computers and other electronic equipment with plastic to protect against water damage.
- All emergency duty personnel shall remain at the Plant until released.

Hurricane at Hand

This phase starts when weather conditions make work or travel outdoors hazardous. When wind speed exceeds 50 mph, all outside movement should be avoided if possible.

At this time, all staff must wear a safety harness if it becomes necessary to go outdoors, so they may be able to tie off when possible. If it becomes necessary to go outdoors, no employee will work or make rounds alone.

Post Emergency

This phase begins when weather hazards have passed. Although the storm may have passed, hazards may still exist due to water and wind damage that may present hazardous conditions to personnel and equipment.

- Walk down the Plant to assess damage. Make an accurate report of all damage and repairs needed. Use video and photographs to document damage.
- Review the Plan for improvement.
- Restore all hurricane supplies

3.5.3 Attachments

- Employee Phone List
- Hurricane Kit List
- List of Food, Personal Hygiene & Miscellaneous Items
- Hurricane Tracking Data Log

3.6 Cyber Security Annex [§25.53(e)(2)(F)]

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3.6.1 [redacted]

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3.7 Physical Security Incident Annex [§25.53(e)(2)(G)]

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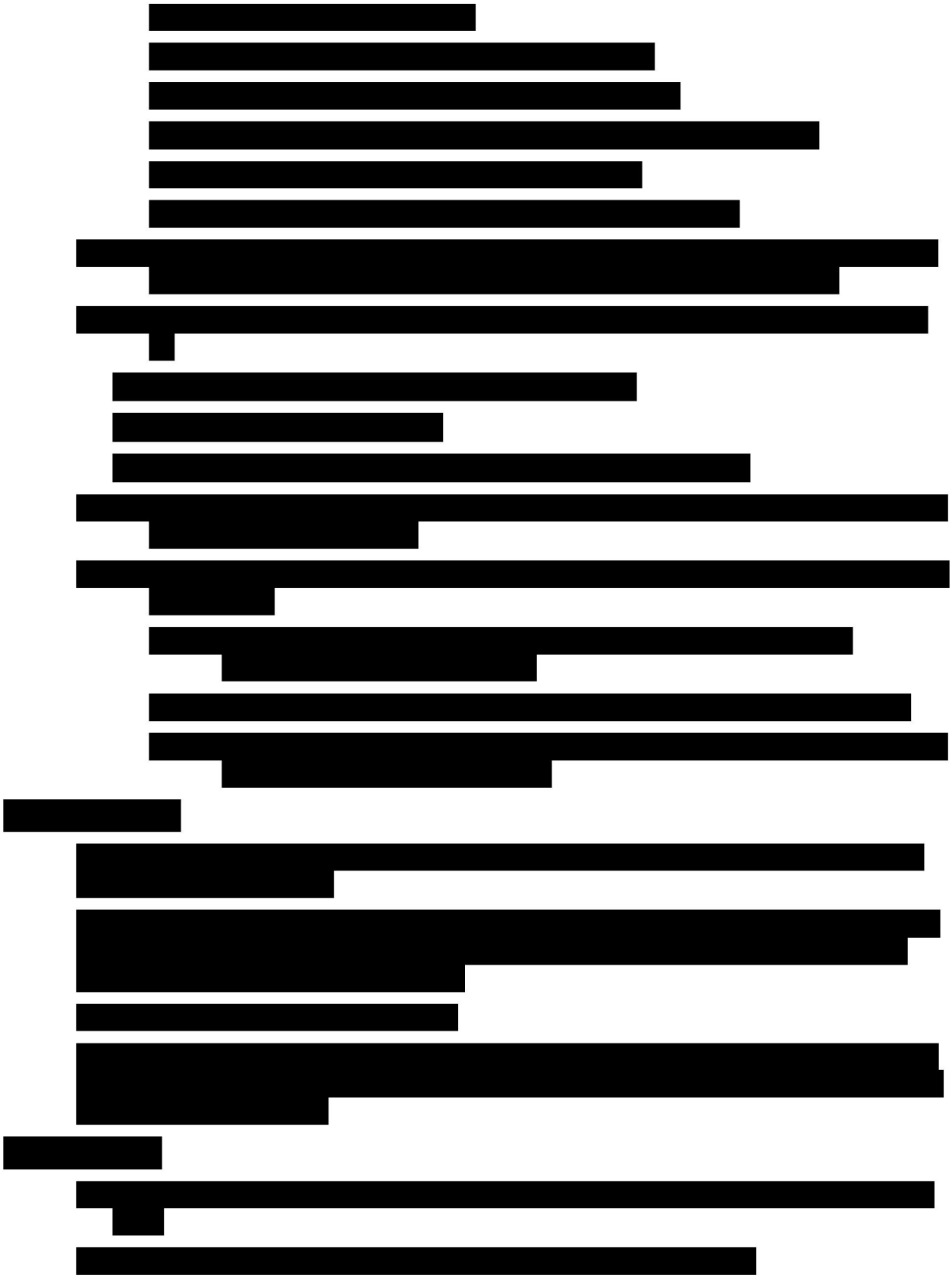

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3.8 Communications Plan [§25.53(d)(2)]

This Communication Plan describes the procedures used during an emergency for communicating with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator. The plan address communication skills, training requirements, media communication instructions, and contacts.

This Communication Plan is designed for crisis communications for use in any situation. It has been adapted from existing EOPs and SOPs. The communication plan is used in conjunction with pertaining plans and procedures. This plan is intended to be used with existing plans and procedures in part with and not in place of.

This plan supplies responders and relevant personnel with a communication plan to inform across jurisdictions, disciplines, and levels of government as needed and if required. The procedure assists in reliable and timely communications among responders and relevant personnel and between public agencies.

PHR Holdings LLC responds to events that will impact the bulk electrical system. PHR Holdings LLC works in conjunction with the facility's Qualified Scheduling Entity (QSE) to relay facility conditions. If PHR Holdings LLC identifies an event impacting the operation of the facility, PHR Holdings LLC shall contact Qualified Scheduling Entity (QSE) as soon as practicable.

3.8.1 Event Response

When an Event has occurred, and a notification has been sent out from the facility, the Plant Manager will be the primary point of contact for employees, and the Emergency Management Coordinator will serve as the single point of contact for all response events to the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity.

After initial notification of the event, the Plant Manager will contact and notify the NAES Operations Director, and facility ownership.

The Plant Manager, in coordination with the NAES Operations Director, will determine if a Crisis Management teleconference will be initiated for this event. If a teleconference is initiated, the Operations Director will utilize contact information attached to the event.

MEDIA

The need for a rapid message to media and / or elected officials is determined by the Facility President. The Emergency Management Coordinator will craft messages, with assistance from the Leadership Team and Plant Manager, as necessary. Targeted audiences for messages will be determined and considered. The official media communication messages will be distributed as appropriate by the Facility President or designee.

MEDIA

Media Relations Do's and Don'ts for Employees

DO

- Always put reporters or local media in touch with media relations first.
- Make yourself familiar with the official media relations policy, available on Connect.
- Contact us if you're not sure about something.
- Ask for coaching or talking points if you are asked to speak in public.

DON'T

- Say "No comment." Most often, it leaves the impression of hiding information from the public.
- Instead, refer questions to media relations.
- Try to handle a hostile reporter on your own.
- Immediately agree to an interview.
- Approach the media on your own or solicit media stories on behalf of the company.

"What do I do when contacted by the media?"

If the media tries to contact you or shows up at your location, your first step should be to contact the Operations Director and facility Plant Manager before any other kind of response.

COMMUNICATION PLAN CONTACTS

CONTACT NAME	Line Detail	PHONE
Qualified Scheduling Entity (QSE)	Main:	1-877-336-3480
	Cell:	1-713-597-1821
Kinder Morgan - Tennessee Gas Pipeline	Office: Daren Juroske	361-782-1686
Energy Transfer Gas (Houston)	Toll-free:	1-800-392-1965
PUCT Assistance	Hotlines:	1-888-782-8477
	Hotlines:	1-512-936-7120
Office of Public Utility Counsel (OPUC)	Austin:	1-512-936-7500
	Toll-free:	1-877-839-0363
	Fax:	1-512-936-7525

Galveston County Emergency Management Coordinator	Office:	(281)-309-5002
Texas Division of Emergency Management (TDEM)	Main Number/Texas State Operations Center:	1-512-424-2208
	ASSISTANT CHIEF:	1-281-517-1353
	SECTION CHIEFS:	1-409-504-0390
		1-215-952-9061
	DISTRICT COORDINATOR 16D:	1-281-633-4827
Texas RE	Main:	1-512- 583-4900

Kinder Morgan - Tennessee Gas Pipeline

Station #9

Daren Juroske

Cell: 361-782-1686

Reliability Coordinator

PHR Holdings LLC will be in compliance with NERC-EOP-004-4 Event Reporting. Upon investigating and confirming a Reportable Event, Plant Manager and NAES will perform internal communications in accordance with AMP-108 Appendix A (Attachment B).

Plant Manager will submit a Reportable Event by completing the following forms:

- NERC Reliability Standard EOP-004-4 Attachment 2: Event Reporting Form, or
- Department of Energy form: DOE-OE-417

Texas Reliability Entity, Inc.

Lewis De LaRosa: Reliability Engineer, Senior

805 Las Cimas Parkway, Suite 200

Austin, Texas, 78746

Office: 512-583-4984

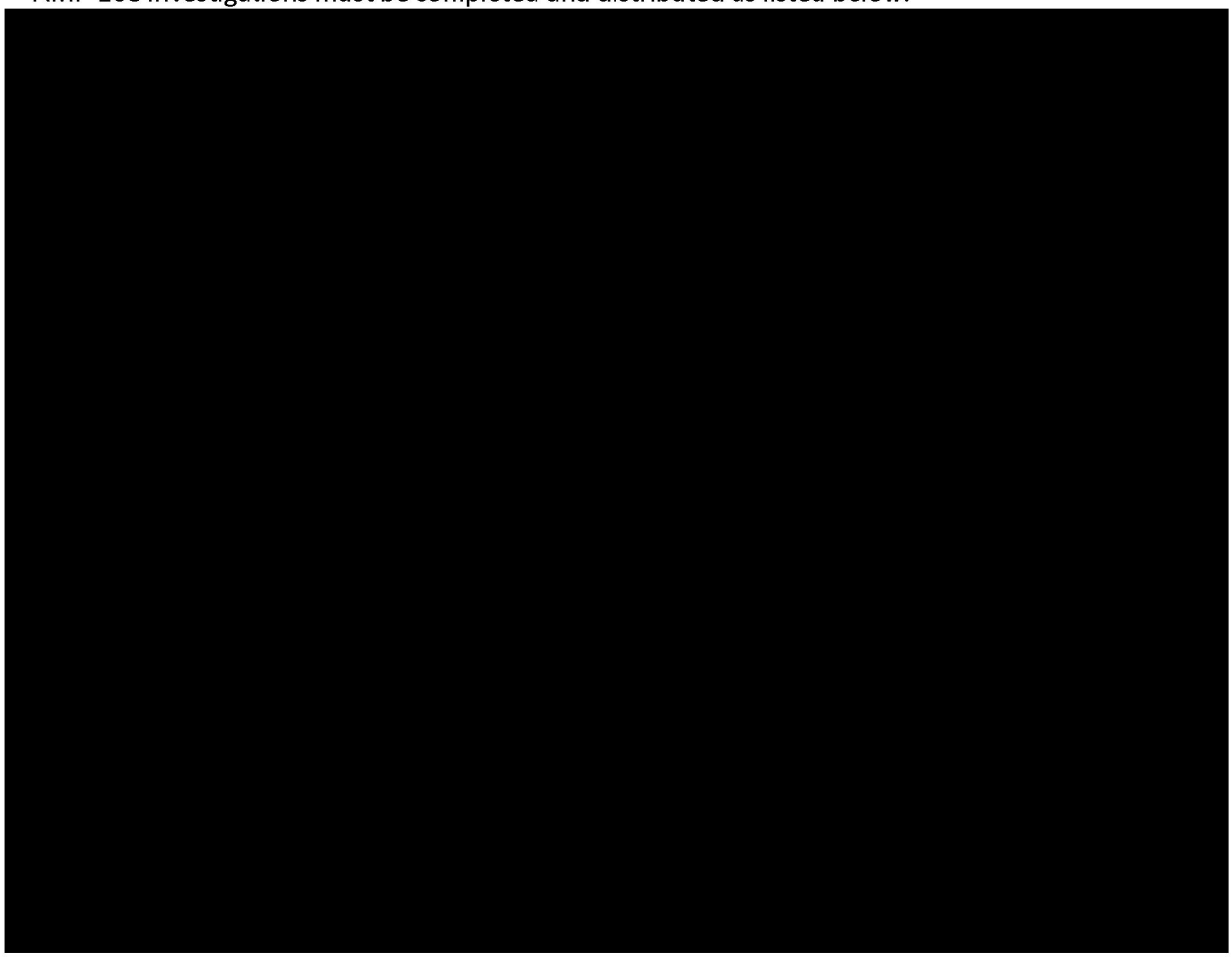
Cell: 512-228-2194

Lewis.DeLaRosa@TexasRE.org

www.texasre.org

COMMUNICATION REPORTS

In accordance with NAES AMP-108 (Attachment B), incident notifications will be made to the Operations Director within the time frames listed below. Subsequent notifications to NAES internal groups and Owner representatives may be made by the Plant, Operations Director, provided all applicable notifications are completed as listed below. Written incident reports and AMP-108 investigations must be completed and distributed as listed below.



3.8.2 NIMS Training

The PHR Holdings LLC emergency management personnel will have received training in the following National Incident Management Training (NIMS) Courses. The courses are available online or locally available for scheduling via the FEMA National Incident Management System (NIMS) training website.

- ICS-100: Introduction to the Incident Command System
- ICS-200: ICS for Single Resources and Initial Action Incidents

- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

Certification will be maintained, and recertification will be performed per NIMS requirements.

3.9 Business Continuity Plan [§25.53(c)(4)(C)(v)]

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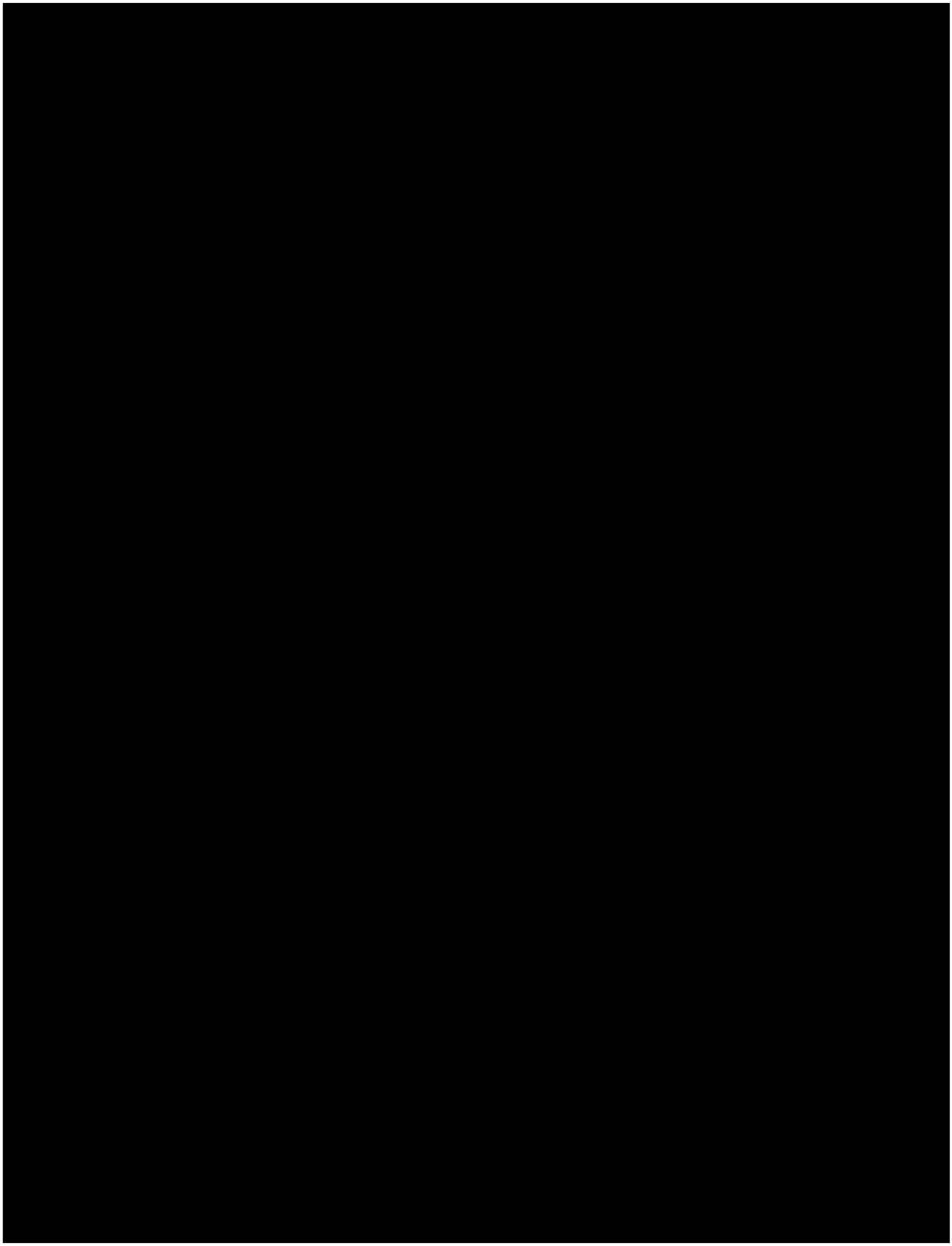
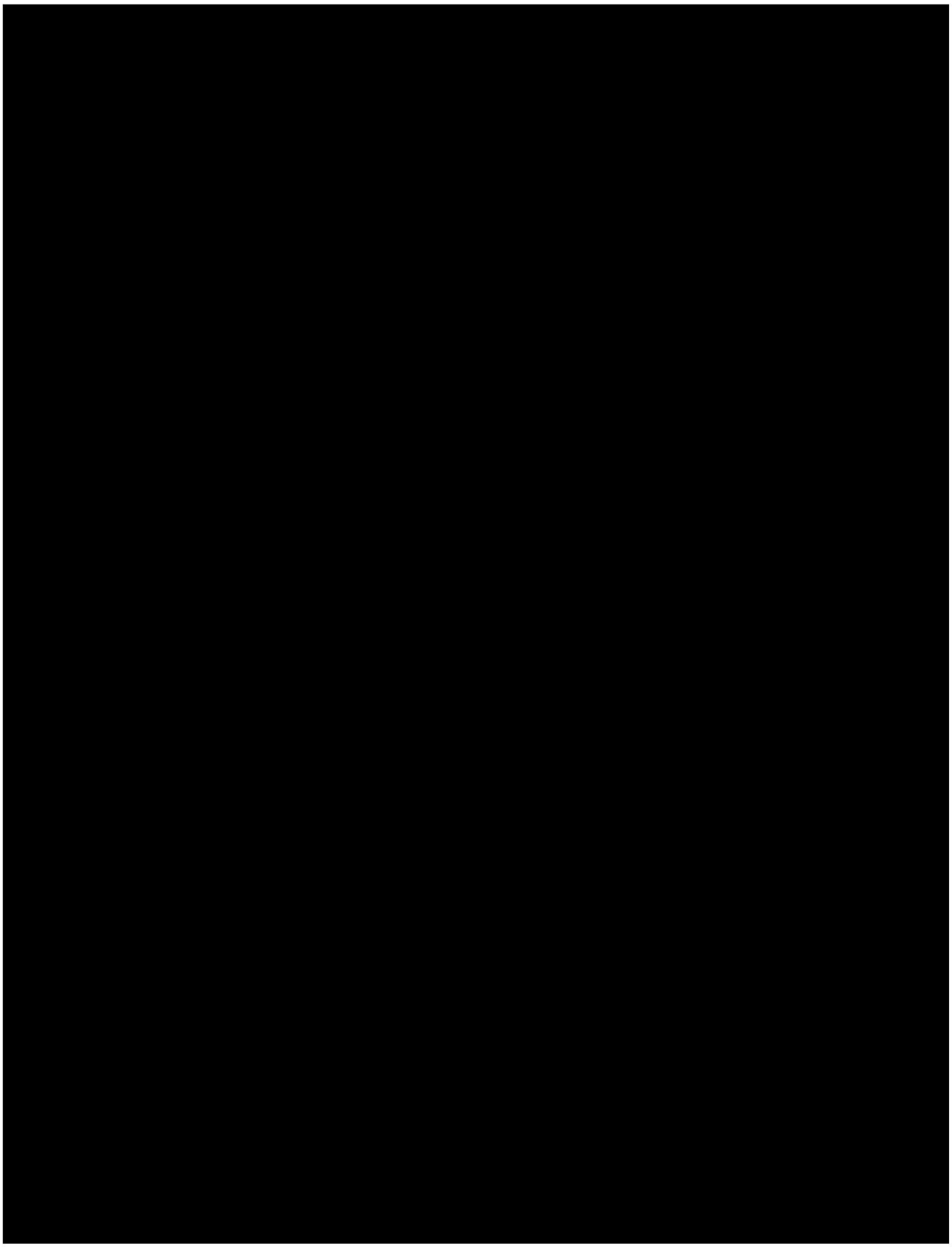
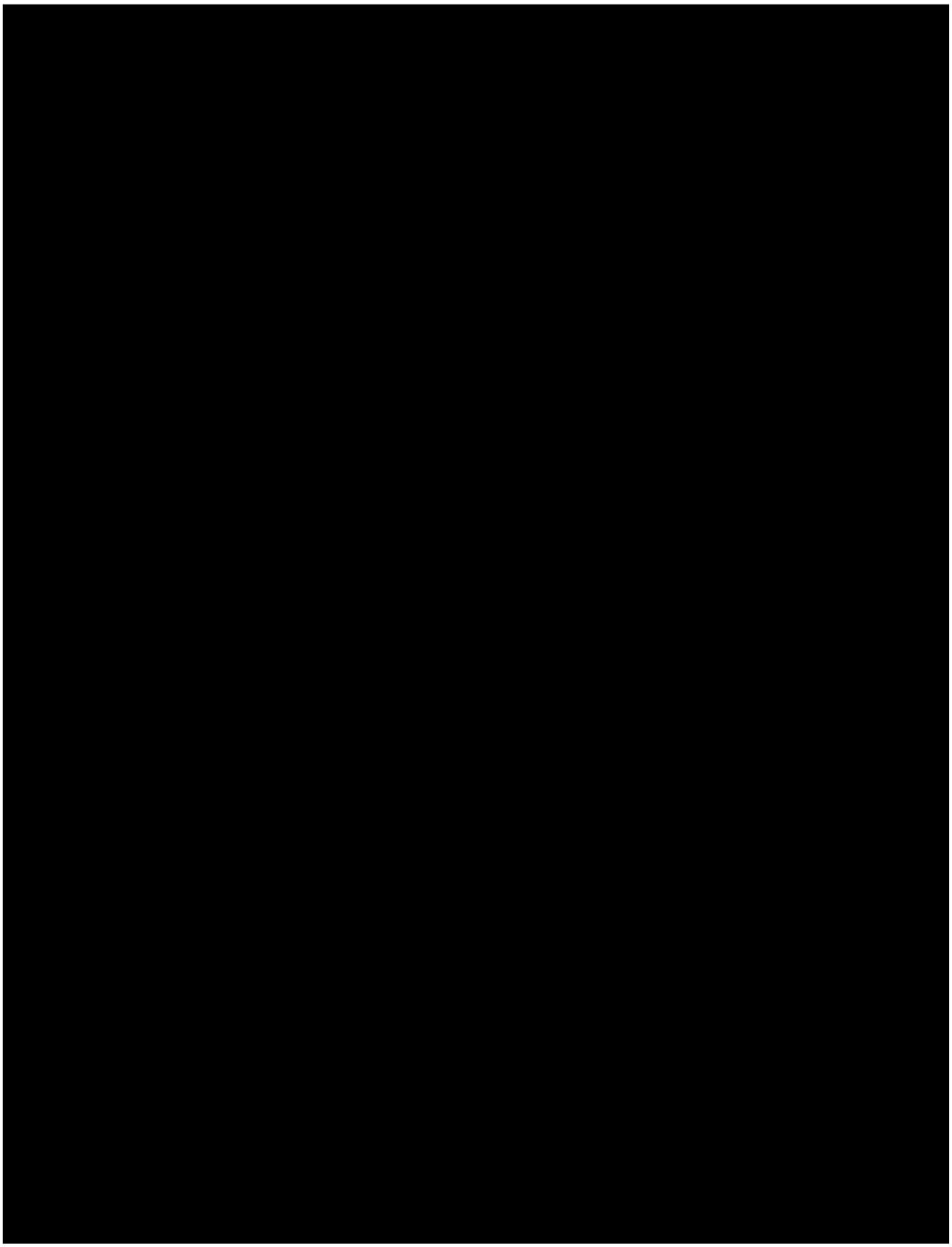
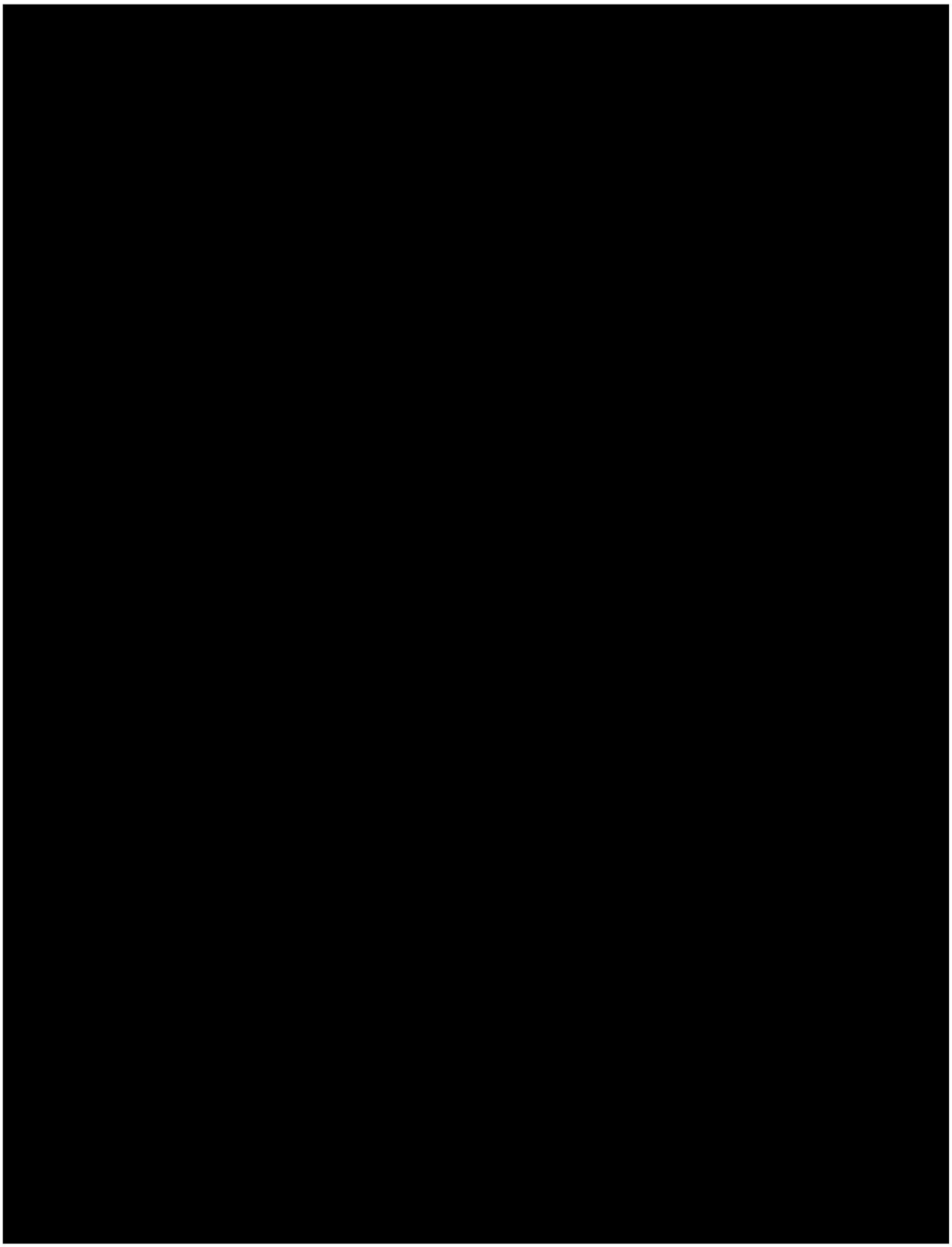
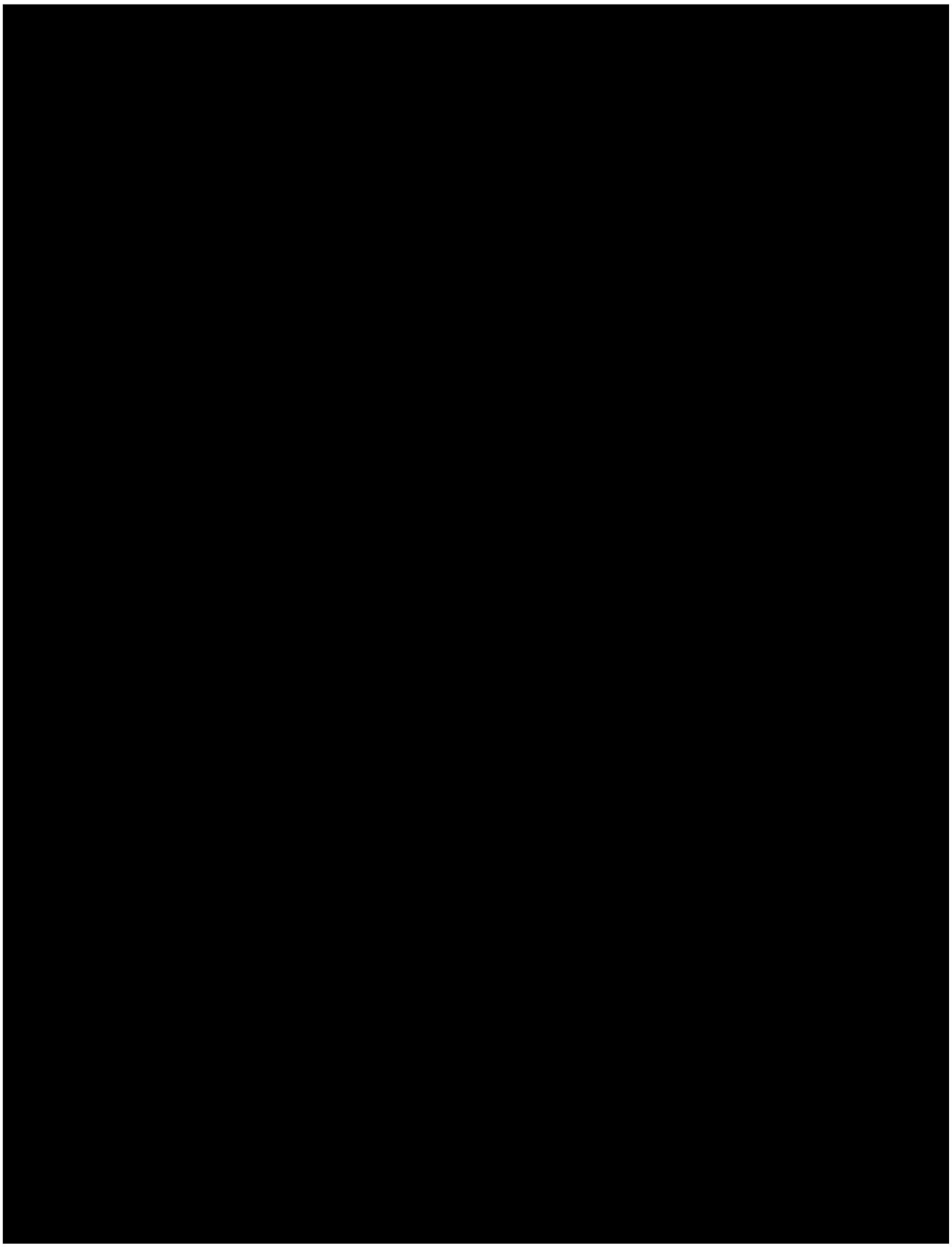
Attachment A – NAES AMP-108

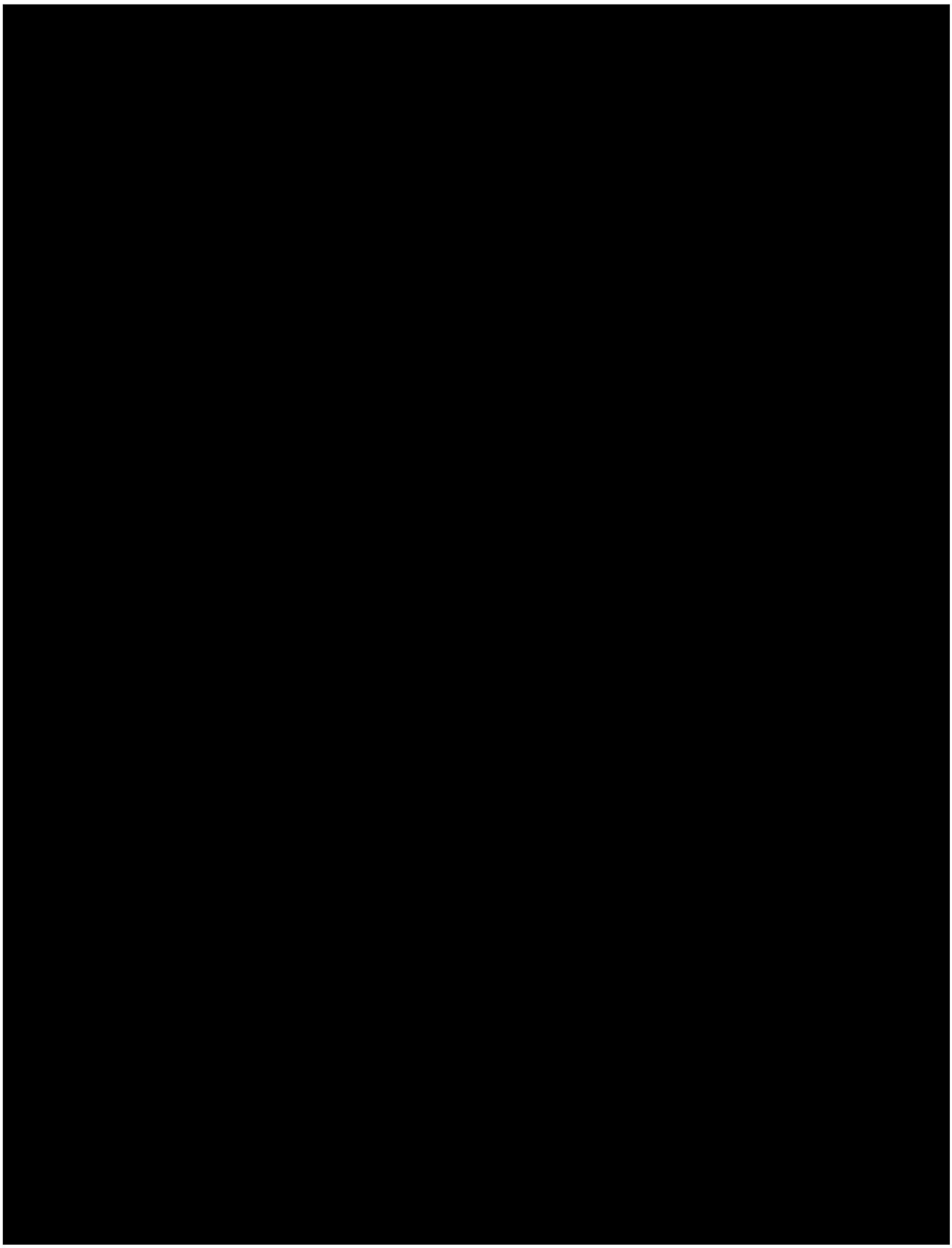




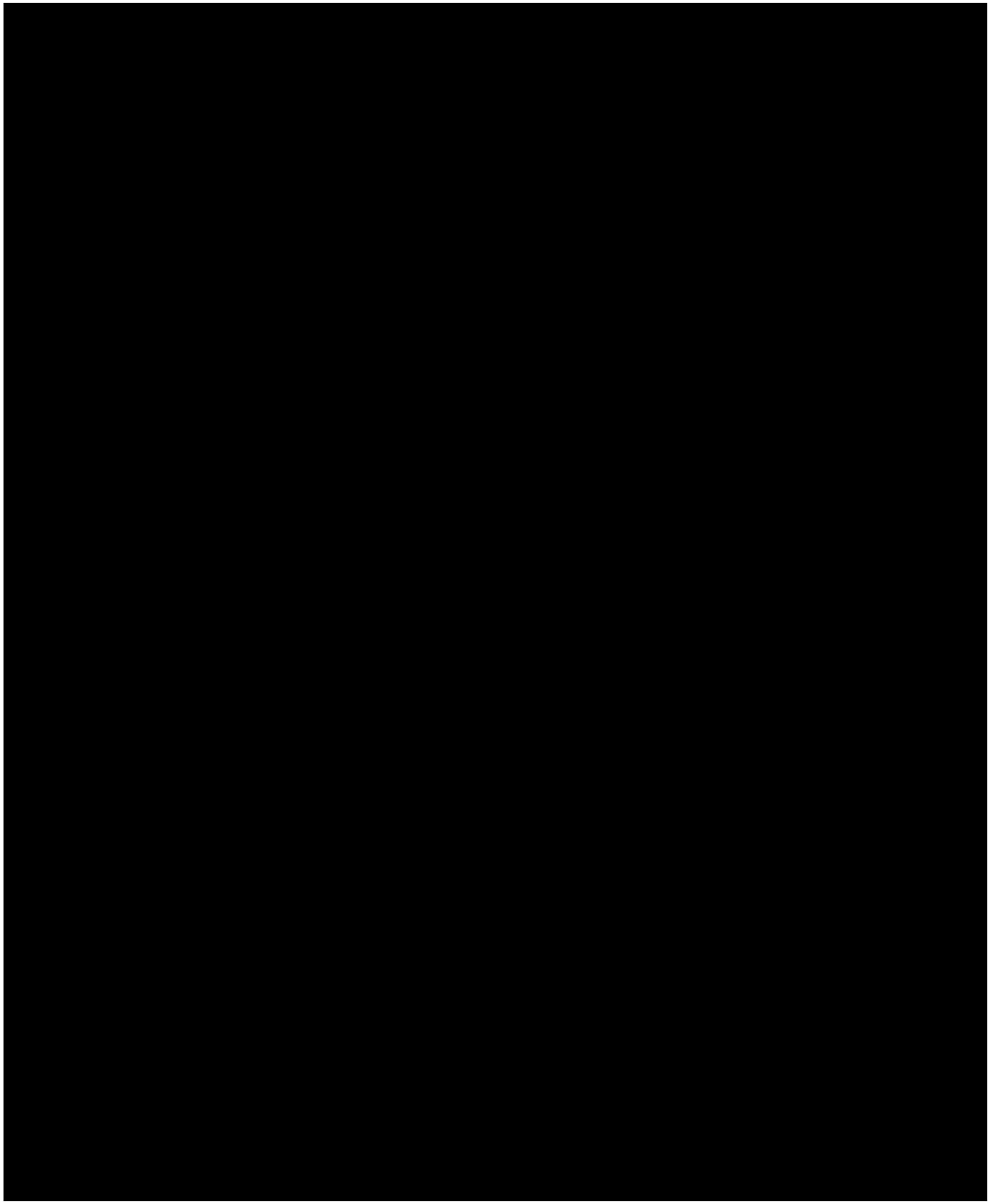








Attachment B – NAES AMP-108 Appendix A



NAES	Emergency Response Plan (no ICP) Safety Manual Program (SMP)

Introduction

Purpose:

The purpose of this procedure is to ensure that workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs. The procedure establishes guidelines for responding to plant emergencies. The instructions in this SMP apply to all plant personnel, contractors, and any others who may be on the plant site during a fire, chemical release or spill, medical emergency, severe weather, or bomb threat.

NOTE:
Reference your, "**Site Safety Master File**" (**Document # XXX-SMF-01**) for site specific policy considerations, and exclusively USE appendices in your "**Site Safety Master File**" to ensure all site considerations and customization needs are met.

Appendices included at the base of each SMP are Standard Sample Documents and may not fully meet the needs of your site.

Scope:

All Site Personnel, All NAES Employees

Responsibilities

① PLANT MANAGER

Is responsible for the development, revision, and implementation of this plan and for assigning the associated responsibilities of Emergency Coordinator and Evacuation Coordinator to selected employees so that emergencies shall be effectively managed at all times of day or week.

② EMERGENCY COORDINATOR

Is responsible for conducting Fire and Evacuation drills. The Emergency Coordinator is responsible for ensuring the Fire Department is notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan. The Emergency Coordinator shall designate an Evacuation Coordinator if the emergency requires personnel to evacuate.

③ CONTROL ROOM OPERATOR

Acts as the Emergency Coordinator until relieved by management.
Accounts for all personnel on-site.

④ EVACUATION COORDINATOR

MAINTAINS communication with Emergency Coordinator.

REPORTS status of evacuated personnel to Emergency Coordinator.

The Evacuation Coordinator may be any qualified plant employee.

⑤ ALL PERSONNEL

PARTICIPATE in training on their work areas regarding fire routes, exits, the location and use of emergency equipment, and understanding and following this plan.

ENSURE contractors or visitors at the facility are familiar with this plan.

Policy

① EMERGENCY RESPONSE OVERVIEW

This procedure provides immediate action steps to be used in a variety of emergencies. It is impossible to provide the exact steps to be followed in all emergencies and emergencies can involve several types of problems at once (a fire with corresponding injuries and a release of hazardous materials for example). Also, the sequence of actions in this procedure may not be the best sequence given the specific situation of an emergency. Steps in this procedure should be performed in an order that fits each situation, relying on sound judgment from plant operators.

A. **General Referencing**

Use the Emergency Response Call Record Form (Appendix E) to document all notifications made during an emergency, including all instructions given by parties contacted. The Emergency Response Contact List (Appendix F) should be posted in the Control Room. Reporting guidelines for accidents and injuries, and for "near-miss" safety/environmental accidents, are covered later in this Safety Manual (SMP-14, Accident and Injury Reporting).

② HAZARDOUS WASTE OPERATIONS & EMERGENCY RESPONSE (HAZWOPER)

A. **Spill Response**

The following steps will be performed immediately upon observation of a hazardous material spill. This procedure is intended to be a concise list of the basic emergency response steps and must be used in conjunction with the Hazardous Material Spill Training and Follow-up section below.

A.1. **NOTIFY** Control Room Operator or Designee and all personnel on site of spill/release.

The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to the emergency.

A.2. **ENSURE** all personnel are evacuated from the spill area.

A.3. **ATTEND** to any injured personnel.

A.4. **IF** necessary, **THEN EVACUATE** the entire plant via designated route shown in Appendix A.

Personnel may be directed to go to a particular area of the plant to evacuate the area of the emergency if evacuation of the site is undesirable.

a. Plant Manager or Designee **DESIGNATES** evacuation route and muster location.

b. **IF** evacuation of plant is undesirable, **THEN EVACUATE** as directed to secondary location.

A.5. **IF** Emergency involves toxic airborne release, **THEN**:

a. Plant Manager or Designee **EVALUATES** release and wind conditions.

NOTE
The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

b. **DETERMINE** whether to evacuate personnel or "shelter-in-place".

The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

c. **IF** the gas cloud is moving in the direction of the control room, **THEN:**

1. **SHUT DOWN** all air conditioning and ventilation systems.

2. All personnel **ENTER** control room area.

3. **CLOSE** all doors leading to control room area.

A.6. **IF** safe option exists, **THEN STOP** the spill at source provided this can be accomplished without causing physical injury.

Examples include:

- **SHUT OFF** pumps,
- **CLOSE** valves,
- **DISCONTINUE** loading/unloading operations.

NOTE
The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to the emergency.

A.7. Plant Manager will **INSTRUCT** plant personnel further on spill response measures.

a. **IF** Plant Manager **DETERMINES** that the spill or measures to prevent, contain, control or clean up the spill is beyond the capability of the facility's ability, training, manpower, or equipment, **THEN CONTACT** Outside Hazardous Materials Emergency Responders and remediation contractors to help control/clean up the spill.

A.8. **IF** spill or release may place the public at risk, **THEN INITIATE** Public Warnings through local emergency agencies listed on the *Emergency Response Contact List* (Appendix F).

A.9. Plant Manager or designee **MAINTAINS** plant security and communications.

a. Owner Representative only **APPROVES** admission to members of the press.

b. Owner Representative or designee **COORDINATES** all public relations, press releases, and outside inquiries.

A.10. **UTILIZE** every reasonable effort to maintain spill on plant property.

A.11. **IF** the material has been released from the containment system, **THEN PREVENT** spill from entering storm sewers, public waters, or from escaping the facility property as long as it is safe to do so.

A.12. **REFERENCE** Safety Data Sheets (SDS) for proper use of personal protective equipment.

A.13. **Take action** to stop the flow of the spill; examples may include:

- **BUILD** berms,
- **PLACE** absorbent materials,
- **PLUG** storm drain inlets, culverts, and ditches leaving the plant

NOTE
Plant personnel are only qualified to respond to a spill at the First Responder - Operations level. Response to the spill can involve operating equipment remotely or placing absorbents in the flow path, if done without placing employees in an unsafe condition.

A.14. **DOCUMENT** all events in detail as soon as possible.

A.15. **FOLLOW UP** with all emergency response organizations, NAES headquarters, and the Owner Representative to ensure all reporting requirements have been met.

A.16. **REPORT** all injuries in accordance with *Injury Response & Reporting* (SMP).

B. **Hazardous Material Spill Training & Follow-up**

This section provides details and information to be used in preparation for and response to emergencies involving hazardous materials incidents in compliance with OSHA Hazardous Waste Operations and Emergency Response Standard. This section is also to be used in conjunction with the facility Spill Prevention, Control, and Countermeasure Plan (SPCC) if the spill involves a fuel oil spill at the plant. The SPCC is required by EPA oil spill regulations 40 CFR 110 (which defines the discharge of oil) and 40 CFR 112.3 (which requires an SPCC). The SPCC is a spill prevention plan (that is, actions to be taken before the spill occurs), while this procedure is a spill response plan (that is, an action to be taken after the spill occurs).

Guidance pertaining to employee safety and training related to major hazardous materials releases and subsequent cleanup operations is contained in 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, referred to as HAZWOPER.

B.1. Overview of Hazardous Materials

The chemicals listed in Appendix H possess characteristics which could, if released in an uncontrolled manner and in sufficient quantity (above a specified threshold quantity), necessitate an emergency response under regulations specified by 29 CFR 1910.120.

B.2. Hazardous Materials Release Guidelines

Incidental releases can be controlled, contained, and cleaned up by employees in the immediate area. No outside or special assistance is required. Nuisance spills and minor releases which do not require immediate attention (due to lack of danger to employees) would be considered within the normal activities and training of the employee.

Incidental releases for the purposes of operator training and response activities pertaining to the unintended release of hazardous materials on-site, may be approached, controlled, stopped, absorbed, neutralized, and cleaned up as long as plant personnel do not endanger themselves, others, or the environment in the process.

- Personnel will carry out system operations at a safe distance to minimize the severity of the release.
- Remote control of valves and pumps will be employed as available to minimize the necessity of approaching the point of origin of an incidental release.
- Personnel will employ PPE, as needed and for which they are trained, to minimize potential for contact with the released materials.

- Clean up and hazardous material disposal techniques will be followed to ensure safe and efficient return to normal operations.
- Recording and reporting of the release should be made promptly as described in the Notification section below.
- The Plant Manager, or a designee, shall review the situation and notification requirements to determine what outside organizations are required to be notified.
- As a minimum, the Owner Representative and NAES Headquarters Managers shall be notified. Refer to the table at Appendix H for Reportable/Threshold Quantities for any Extremely Hazardous Substances that are stored on-site. Proper decontamination of equipment and PPE shall be implemented after the cleanup is completed.

A hazardous materials emergency response is any response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release, which may cause high levels of exposure to toxic substances, or which poses danger to employees requiring immediate attention.

- No employee shall attempt to perform actions for which they have not been prepared, through training and experience, or for which they are not properly equipped.
- On-site and off-site training will be conducted both initially and on a continuing basis, as necessary, to ensure that personnel have the knowledge and experience to make a reasonable determination of the dangers when faced with a release situation.
- If an uncontrolled release occurs resulting in an emergency, the designated off-site emergency response organizations shall be contacted. Refer to the *Emergency Response Contact (Phone) List* in (Appendix F).

Refer to SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.

B.3. Resource Allocation

The Plant Manager has the authority to commit resources and funds for any spill remediation activity. He may delegate duties to other employees to expedite spill containment, clean-up, and disposal. In the event of a major spill or release, the Plant Manager will be in charge of the handling and cleanup of the toxic material. The clean-up may be delegated to a licensed spill cleanup company or a government agency (i.e., Ammonia supplier or other chemical supplier, Fire Department, or commercial response organization). The Plant Manager, or a designee, would remain in charge of the overall plant operation and coordination of

spill response activities. Note: the Fire Department has the authority to take over the position of Incident Commander upon advisement.

B.4. Emergency Response Training

Training shall be based on the duties and functions to be performed by each employee. Documentation of such training, including program agendas (with a copy of any outlines, overheads or handouts) and training rosters shall be maintained.

Facility response personnel are given instruction in emergency procedures related to a release of a hazardous substance or any hazardous chemical. Topics of instruction include emergency equipment (proper use, inspection and maintenance procedures), emergency systems (such as alarms/communications, key cut off systems for automatic feed systems), response procedures for fires, explosions, and spills (including spills to groundwater), and the organizational responsibilities of response personnel under the National Incident Management System.

B.5. First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They will take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- An understanding of what a hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.
- An understanding of the role of the first responder awareness individual in the employer emergency response plan, including site security and control, and the DOT Emergency Response Guidebook.
- The ability to realize the need for additional resources, and to make the appropriate notifications to the communications center.

B.6. First Responder Operations Level

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the spill from a safe

distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:

- Knowledge of the basic hazard and risk assessment techniques.
- Knowledge of how to select and use proper PPE provided to the first responder operational level.
- An understanding of basic hazardous materials terms.
- Knowledge of how to perform basic control, containment and/or confinement within the capabilities of the resources and PPE available within their unit.
- Knowledge of how to implement basic decontamination procedures.
- An understanding of the relevant standard operating and termination procedures.

B.7. Spill Response

1. Upon observation of a release of a hazardous material, chemical, or oil, employees IMMEDIATELY **NOTIFY** Plant Manager with information concerning the spill:
   - Employee name
   - Location of spill
   - Type and quantity of material spilled
   - Actions and result of actions taken to mitigate the spill
   - Circumstances that caused the spill
2. Plant Manager or Designee **NOTIFIES** necessary organizations and governmental agencies listed on the Emergency Contact (Phone) List in Appendix F.
3. **IF** necessary, Plant Manager or Designee **CONTACTS** outside Hazardous Materials Emergency Response organizations and/or hazardous waste clean-up contractors to assist in the remediation of the spill.
4. Plant Manager or Designee **NOTIFIES** NAES management and Owner Representative of all spills regardless of quantity and type as soon as practical.
5. Plant Manager or Designee **PROVIDES** the following information in the agency notification:

a. Facility name, exact location, and phone number

b. Source and cause of spill

c. Type (chemical name), volume of material released, and whether the material is classified as extremely hazardous

d. The estimated volume that reached navigable waters

e. Time, date, and duration of the spill

f. Medium of release (air, soil, water) and anticipated release movement

g. Actions taken and anticipated

h. State whether evacuation is needed

i. Weather conditions, if applicable

j. Known health risks and required medical attention

k. Names of other parties contacted

l. Names of other parties to be contacted

6. **WHEN** recording notifications, **DOCUMENT** the following:

   a. **REPORT** factual notifications,

   b. **AVOID** speculation,

   c. **MAINTAIN** record of all notifications made including all instructions given by parties contacted using the *Emergency Response Call Record Form* shown on Appendix E.

WARNING
Under no circumstances shall any plant personnel provide information to media or the general public concerning the spill

7. **REFER** all inquiries from the media and the public to the Plant Manager or designee.

8. Plant Manager **REFERS** all inquiries to the Owner Representative.

9. For plants with fuel oil:

   Per 40 CFR 112.4, in the event that a discharge of 1,000 gallons of oil escapes the containment systems and enters into the navigable waters of the United States in a single spill event or a discharge of harmful quantities in two spill events within any twelve month period occurs, the Plant Manager will submit notification in writing to the EPA Regional Administrator as per EPA regulations:

NOTE
The following information is required in the above notification. An asterisk (*) denotes information included in the SPCC plan.

   a. A complete copy of the SPCC plan

   b. Name, phone number, and address of the facility (*)

   c. Owner and operator name and address (*)

   d. Date and year of initial facility operation (*)

   e. Maximum storage capacity and average daily use (*)

   f. Description of the facility (*)

   g. Quantity and type of material spilled

   h. Cause(s) of the spill(s)

   i. Corrective actions

   j. Additional preventative measures

   k. Other pertinent information

10. Within 24 hours, Plant Staff shall initiate an **INVESTIGATION** of any incident that resulted in, or could reasonably have resulted in, a release of hazardous materials.

B.8. Managerial Responsibilities

Managerial responsibilities following a Hazmat release include;

- Determining origin of incident
- Investigating effectiveness of this procedure
- Evaluating potential need for modifications to procedure and plant personal response.

NAES will be responsible for the implementation and communication of any changes to this procedure following an accidental release of aqueous ammonia. A summary shall be prepared at the conclusion of the investigation that includes at a minimum:

- Date of incident and investigation
- A description of the incident
- The factors that contributed to the incident
- Any recommendations resulting from the investigation

The managers of the facility will promptly address and resolve the investigation findings and recommendations. Resolutions and corrective actions shall be documented. The findings shall be reviewed with all affected personnel whose job tasks are affected by the findings. Investigation summaries shall be retained for five years in the plant environmental files.

B.9. Spill Clean-up and Disposal Procedure

Cleanup will be conducted to coordinate collection for isolation and disposal of contaminated products and materials, as appropriate. The categories listed below will be isolated and secured independently. These steps are necessary to reduce costs associated with clean up and disposal of contaminated materials.

- Recovered pure product for possible refining and reuse
- Contaminated PPE for separate disposal
- Oiled debris for separate disposal, i.e., wood products, beauty bark, etc.
- Contaminated soils for possible incineration or separate disposal
- Absorbent materials for incineration

All residuals (recovered chemicals, contaminated clean up materials, and contaminated soil) resulting from spill remediation will be placed in containers that have been approved for use as such.

Disposal of spilled material will meet all Federal and State regulations guiding the disposal of waste. Hazardous waste manifests will accompany containers of spill residues if the residue is identified as a hazardous waste in accordance with state and federal hazardous waste regulations. All required labeling and recordkeeping

requirements will be followed.

Consult the applicable Material Safety Data Sheet for the substance to determine the appropriate cleanup procedures. Ensure all plant and contractor personnel assisting with the clean-up are aware of clean-up instructions and hazards listed on the SDS.

Refer to the facility Environmental instructions for further guidelines on the disposal of hazardous materials. Additionally, contact NAES headquarters and or the NAES Environmental Support Services (ESS) Division for assistance, if needed.

③ FIRE RESPONSE PROCEDURE

A. In the event of any fire, immediately **REPORT** fire to the Control Room Operator (CRO) via plant radio, cell phone, or other means.

A.1. The report to the CRO shall include the following:

- Your name
- Nature of event – "Fire"
- Location of the fire
- Severity of the fire
- Your planned action (e.g., evacuate or use fire extinguisher)

NOTE
Incipient stage fire means a fire which is in the initial or beginning stage and which can be controlled or extinguished by one person with one portable fire extinguisher.

B. **IF** fire is in incipient stage **AND** Respondent is properly trained, **RESPOND** using appropriate fire response equipment. EXCEPTIONS: site SOP's for handling coal fires will take precedence over this procedure.

WARNING

PERSONNEL INJURY or DEATH may occur if fire progresses to a life-threatening event, so evacuate the area immediately .and notify the Control Room

C. **IF** fire progresses beyond incipient stage, **THEN EVACUATE** immediate area to safe place.

D. **IF** fire is beyond the incipient stage **AND** requires outside emergency response, **THEN** the CRO will:

D.1. **CONTACT** 911,

D.2. **SOUND** plant evacuation alarm.

E. To facilitate a quick response, Plant **DESIGNATES** liaison to meet the Fire Response Service at the main entrance gate.

F. Plant personnel **EVACUATE** to Primary Evacuation Area identified in Appendix A.

F.1. **IF** necessary, **THEN DETERMINE** a secondary evacuation area based upon site conditions and wind direction (as determined by the wind sock).

G. **UTILIZE** the Visitor Logbook from the Administration Building to aid in accounting for all personnel.

NOTE
In the event of a natural gas leak of any size, immediately shut the Fuel Emergency Stop Valve (i.e.. slam shut valve) from the control room.

④ FIRE RESPONSE DRILL

A. Annually **CONDUCT** Fire Evacuation Drills.

A.1. **MAINTAIN** written record of all drills performed.

A.2. **CORRECT** deficiencies observed during drills.

B. At a minimum, **TEST** Plant Evacuation Alarm monthly.

⑤ CHEMICAL RELEASE/SPILL PROCEDURE

A. In the event of a chemical spill or release, immediately report it to the CRO via plant radio, cell phone, or other means. The report to the CRO shall include the following:

- Your name
- Nature of event – "chemical spill/release"
- Location of the spill/release
- Chemical identity and severity of the spill/release (estimate quantity)
- Your planned action (e.g. evacuate or close remote valve)

B. Depending on the chemical and quantity involved, refer to section 4.B for steps necessary to respond to the spill.

NOTE
Immediately call 911 for any emergency that is considered a threatened, uncontrolled release of any hazardous material.

⑥ MEDICAL EMERGENCY

A. **REPORT** all injuries to the supervisor, no matter how minor.

B. First Aid/CPR trained personnel **RESPOND** to minor first aid injuries.

C. **IF** someone is seriously hurt, **THEN NOTIFY** the CRO of the following;

- Location of the injured person
- Nature of the injury
- Any other important information related to the incident scene (ex. down power line next to injured person, chemical drum spill, etc.).

D. CRO **CONTACT** 911 to alert emergency crews. An individual will be designated to meet emergency crews at the main entrance gate.

E. CRO **ANNOUNCES** for all available First Aid/CPR trained personnel to **REPORT** to the incident site.

E.1. The First Aid/CPR trained personnel **ADMINISTER** First Aid and any other measures within their training until the emergency crews arrive at the scene.

F. **IF** the situation warrants the rescue of an unconscious or immobile person from a confined space, a collapsed trench, or an elevated surface or personal fall arrest system, **THEN**:

F.1. CRO **CONTACTS** 911,

F.2. CRO **REPORTS** to emergency personnel the type, location, and hazards of the area.

⑦ EARTHQUAKES, TORNADOS, & SEVERE STORM EMERGENCIES

A. **Earthquakes**

A.1. **Immediately get down on the floor. Most injuries during earthquakes occur when persons are knocked to the ground during tremors. TAKE** cover under a desk or strong table or in a doorway, or sit or stand against an inside wall.

A.2. **STAY** away from windows, glass, bookcases, and outside doors.

A.3. **STAY** inside the building during a severe earthquake because of the hazards of downed power lines, falling debris from the building, etc.

A.4. **MOVE** away from buildings and utility wires.

A.5. **WATCH** for falling glass, electrical wires, poles or other debris.

A.6. **CHECK** for injuries and provide first aid.

A.7. **CHECK** for broken fuel lines and electrical faults.

A.8. **ISOLATE** ruptures and faults.

A.9. **CHECK** for ruptures in systems containing hazardous chemicals. **ISOLATE AND CONTAIN** spills.

A.10. **PLACE** plant in a safe condition by shutting down equipment as necessary.

A.11. **Avoid the use of** the telephone except emergency notifications only.

B. **Tornadoes & Severe Storms**

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

- The Plant Manager shall be notified and will try to be on-site to determine appropriate action.
- **IF** the Plant Manager cannot be contacted, **THEN** the CRO shall determine the appropriate action.
- During severe thunderstorms, caution should be used during outside activities.
- If thunderstorms are in the immediate area of the plant, outside activities should be curtailed.
- The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

- The best protection in a tornado is usually an underground area. The best above ground areas in a building are:
  - Small interior rooms on the lowest floor without windows,
  - Hallways on lowest floor away from outside doors and windows,
  - Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.

B.1. **INSTRUCT** Employees to seek shelter areas as near as possible to inside walls, away from window areas.

B.2. CRO **ANNOUNCES** warnings to all personnel of the outside conditions and to seek shelter inside in a safe location.

B.3. **TAKE SHELTER** as close to the floor as possible and against sturdy machinery that will prevent portions of the roof, etc. from striking directly should they fall.

WARNING
An automobile is not a safe place to be in these circumstances.

B.4. **STAY INSIDE** the building until dangerous wind levels have subsided.

B.5. **IF** outside, **THEN SEEK** safety in a low-lying depression such as a ditch or ravine.

B.6. CRO **ANNOUNCES** indicating when the tornado or severe storm has passed.

B.7. **DESIGNATE** an investigative team to **INSPECT** for:

- All outside plant areas
- Damage to machinery or dangerous debris
- Down power lines
- Other potentially dangerous conditions

⑧ BOMB THREATS & ACTS OF SABOTAGE

The events of September 11, 2001 coupled with the northeast power outage of August 14, 2003 and similar electrical disturbances have heightened the awareness of people worldwide to the threat of Sabotage to critical facilities in general and to the electrical infrastructure in particular. To protect the North American electrical infrastructure (Bulk Electric System), NAES requires that all its power plant managers and operators shall understand and comply with the following NERC requirements.

Recognition (NERC Standard CIP-001 R1)
Each NAES-managed power generating facility shall have procedures for the recognition of and for making their operating personnel aware of sabotage events on its facilities and multi-site sabotage affecting larger portions of the interconnection.

Response (NERC Standard CIP-001 R3)
Each NAES-managed power generating facility shall provide its operating personnel with sabotage response guidelines, including personnel to contact, for reporting disturbances due to sabotage events.

Communication (NERC Standard CIP-001 R2)
Each NAES-managed power generating facility shall have procedures for the communication of information concerning sabotage events to appropriate parties in the interconnection.

Reporting (NERC Standard CIP-001 R4)
Each NAES-managed power generating facility shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) officials and develop reporting procedures as appropriate to their circumstances.

A. Recognition

Understanding when an act of Sabotage is taking place or is about to take place is the first step towards preventing the subsequent injury and damage that the event can ultimately result in. A variety of tools are available to each NAES-managed facility meant to be used in conjunction with the Emergency Response Plan for any actual or potential Acts of Sabotage. These tools are available as Appendices to this procedure and are described below:

- Appendix B – *Bomb Threat Checklist* - contains a checklist to be used when a bomb threat is received over the phone. This will help the receiver of the call obtain as much information as possible to help find the source.
- Appendix C – *Suspected Bomb/Sabotage Device Safety Precautions* - contains a list of precautions to be taken around unidentified packages, bombs, and suspected Sabotage devices.
- Appendix G - *Actions for Suspected Sabotage Events* - contains a list and description of potential Sabotage events as well as immediate actions to be taken in case of those types of events.

The Plant Manager and all plant personnel and visitors shall maintain and enforce a strict site security policy to try to prevent the occurrence of any potential Sabotage events.

B. **Response**

Although many threats turn out to be hoaxes, it is very important to not dismiss the possibility of injury and damage and treat every situation seriously. When a bomb threat or discovery of a suspected Sabotage event is discovered, remember to not panic, remain calm, and follow the steps below:

For any abnormal events that could potentially be acts of Sabotage, refer to *Actions for Suspected Sabotage Events* (Appendix G).

B.1. Phone calls received regarding a Bomb Threat, or other Act of Sabotage, refer to *Bomb Threat Checklist* (Appendix B) while keeping the following items in mind:

a. **ENGAGE** the caller in as much conversation as possible and complete the checklist as the call progresses. If you are at a phone with caller ID, note the phone number of the caller.

b. **KEEP** the caller on the line as long as possible. Ask the caller to repeat the message even if you fully understood the message the first time. This will stall or cause a delay and allow the operator more time to react properly and involve the necessary personnel.

c. **IF** the caller does not give a location of the device, Sabotage method, or a time for the event, **THEN ATTEMPT** to obtain this information.

d. **INFORM** caller that the building is occupied and that such an event (explosion or equipment destruction) would result in serious injury or death to innocent people.

e. Be aware of the caller's voice and any background noises that may assist in identifying the location of the call.

f. **RECORD** your findings on the checklist.

g. **ATTEMPT** to have the caller speak to a designated member of management.

h. **STAY** on the line until the conversation ends and the caller hangs up.

B.2. **MAINTAIN** security and communications.

a. Plant Manager (or designee) **MAINTAINS** plant security by restricting access so that only essential plant personnel and emergency personnel are admitted.

b. **IF** there are enough people on-site, **THEN MAN** the telephones. Two-way radio communication should be kept free to be used as needed.

c. **RESTRICT** admission to members of the press without the approval of the Owner Representative.

d. Owner Representative or designee **HANDLES** all public relations, press releases, and outside inquiries.

WARNING
PERSONNEL INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.

B.3. **QUICKLY SEARCH** the plant area for suspicious, unusual, or foreign items (suspected bombs/Sabotage devices).

B.4. **REPORT** any findings.

B.5. **OBSERVE** the precautions listed in Appendix C.

B.6. **WHEN** police arrive, **THEN ASSIST** as necessary with more detailed search of the plant.

B.7. **IF** suspicious item or bomb is located during the search, **THEN PERFORM** the following:

WARNIING
INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.

a. **ISOLATE** the item.

b. **NOTE** the location, appearance, colors, wires, etc.

c. **CONTACT** civil authorities and management in person.

d. **AVOID** using two-way radios or intercoms.

NOTE
At any time during these actions, the Plant Manager or on shift CRO can order the shutdown of equipment and evacuation if, in his judgment, there are strong indications of an immediate serious threat to the plant and/or its personnel.

B.8. **IF** plant is evacuated at any point, **RETURN** after the police have declared the site safe.

B.9. **UPON** completion of the threat;

a. **ASSEMBLE** Management Team to critique handling of situation.

b. **COLLECT** Recommendations found in critique.

c. **INCORPORATE** recommendations for improvement into the policy.

d. **CONDUCT** re-training with necessary personnel.

C. **Communication**

C.1. **REPORT** the event to the police as soon as possible.

C.2. **PROVIDE** the police with the following information:

- Your name
- Your location and phone number
- A detailed account of the event
- **IF** the event is a threat received (via phone or other method), **THEN REPORT** the following:

1. Name of the initial recipient
2. Name of any employee threatened by the caller
3. Normal work location of any threatened employee
4. Time the bomb is supposed to explode/Sabotage event is to occur
5. Exact location of the bomb or Sabotage device
6. Outside appearance or description of the bomb or device

C.3. **ENSURE** plant operating personnel are aware of the sabotage event on your facility and any sabotage event that would affect larger portions of the Interconnection.

NOTE
Have all written records or notes of the threat available.

C.4. **WHEN** police arrive at the site, **THEN** Plant Manager (or designee) **BRIEFS** the police as to:

- Location of any emergency control valves or switches,
- Plant overall security status, and
- Any other information regarding the nature of the threat or event.

C.5. **REQUEST** Appropriate assistance from the police including site protection and personnel protection during evacuation.

C.6. **WHEN** the threat has been at least tentatively identified and controlled, **THEN** PERFORM the following:

a. **NOTIFY** the Plant Manager, the Owners Representative, and the NAES Headquarters Operations Director.

b. **REFERENCE** Applicable telephone numbers are listed below for quick access.

c. **UTILIZE** Additional contact information as necessary based on the circumstances of the event provided in Appendix F.

D. **Reporting**

It is essential that any incident involving a real or suspected threat of Sabotage be reported as soon as reasonably possible.

Distribution of this information should be initiated by the immediate submission of an Electrical Emergency Incident and Disturbance Report (Form OE-417) to the US Department of Energy according to the OE-417 Form instructions. (http://www.oe.netl.doe.gov/oe417.aspx)

The Form OE-417 consists of an Alert Notice (Schedule 1) and a Narrative Description (Schedule 2) which must be submitted within the time frames described below (and as specified in the top portion of the Alert Notice).

NOTE

NAES NERC procedure RCP-EOP-004-ATT-A contains reporting guidelines for reporting damage or destruction of the Facility that results from actual or suspected intentional human action, as well as any physical threats to the Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. Please refer to RCP-NERC-EOP-004-ATT-A for NERC Event Reporting guidelines for these instances.

(9) TRAINING

A. All plant employees shall receive training on emergency response procedures on an annual basis.

B. All newly hired employees shall receive this training during orientation.

C. Contract employees must receive this training as integrated into the contractor orientation and training.

NOTE

In addition to the training, the appropriate number of radios shall be determined and issued to the Contractor Supervisor/Foreman.

D. All plant employees training must include at a minimum the following:

- Familiarization with this plan
- Any Hazmat Training that may be applicable
- The use of any firefighting equipment available
- Any special items or needs that may rise

E. All contract employees training must include the following:

- A general overview of this plan
- Any special items or needs that may arise during the course of their stay on-site

F. A written record must be maintained of all plant employees and contract employees who have received the training.

Attachments

SMP-02 Appendix A- Facility Evacuation Route Diagram

SMP-02 Appendix B- Bomb Threat Checklist

SMP-02 Appendix C- Suspected Bomb Sabotage Device Safety Precautions

SMP-02 Appendix D- Emergency Response Event Log

SMP-02 Appendix E- Emergency Response Call Record Form

SMP-02 Appendix F- Emergency Response Contact List

SMP-02 Appendix G : Actions for Suspected Sabotage Events

SMP-02 Appendix H : On-Site Hazardous Chemicals

SMP-02 Table 1- Emergency Organizational Telephone Numbers for Threat Control

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R0.1	5/27/2020 2:59 PM	Updated reference to Appendix H and SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.	Alex Tan
R0	10/1/2019 7:22 PM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	1/30/2019 10:52 AM	New document	Jason Gammon

PHR PEAKERS	PH Robinson	Revision: 2
		Issue Date: 3-2021
	Plant Winterization	Review Cycle: Annually
		Proc.SOP PHR WNTR

PH Robinson Peakers

Standard Operation Procedure

Plant Winterization

Rev	Date	Originator	Checked	Approved
0	03/8/2021	RON DENNISON	RLEE	RLEE
1	11/5/2021	WOODY DEBENEDICTIS	RLEE	
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1.0 PURPOSE

1.1 The Winterization procedure will provide guidance for protection of equipment during severe weather conditions.

2.0 SCOPE

2.1 This SOP provides instructions to plant personnel for securing plant equipment. Detailed checklists in Appendix A, B, C, D, and E are to be completed to secure equipment. Equipment modifications and operating experience will necessitate additions, and deletions to these procedures.

2.2 It is acknowledged that this document does not cover all plant or system operating scenarios. This document has been developed to assist plant personnel with the knowledge to properly secure the plant and operate during severe weather conditions. This document does not take the place of sound operating practices or knowledge gained through experience.

3.0 REFERENCE

3.1 Plant P. & I.D. drawings.

3.1.1 Found on the PH Robinson Server under G Drive → Operations → PHR Training → Drawings and Specifications

4.0 DEFINITIONS

4.1 Extreme Weather Condition – Weather conditions that warrant protection of equipment during conditions that can damage equipment, cause failure, or prevent the plant from dispatch.

4.2 Freeze Watch – PM beginning October 1 of every year and starts the winterization preparation. During this time the items on Appendix A will be installed/staged and tested complete by November 1 using Freeze Stage 0 Winterization Checklist Appendix A.

4.3 Freeze Stage 0 – Any condition where temperatures will fall below 40 °F in conjunction with impending deterioration of overall weather conditions. Freeze Stage 0 will automatically be enacted annually beginning November 1 and ending March 31. When in Freeze Stage 0 with deteriorating conditions that could lead to a change in Freeze Staging, the CRO will begin a detailed watch utilizing the NOAA weather tracker. This check will be conducted every 4 hours by the CRO and logged in the "Weather Watch Checklist" Appendix E. This will provide ample time to prepare for rapidly changing weather conditions.

4.4 Freeze Stage 1 – Any condition where temperatures will reach 35 °F (ambient) or below. Once Freeze Stage 1 has been enacted, Appendix B will be completed and a rounds keeping log will be used to monitor parameters related to Freeze Stage 1. The rounds in Appendix D will be issued by the CRO and will be completed by the OMT every 4 hours.

4.5 Freeze Stage 2 – Any condition where temperatures will reach 32 °F (ambient) or below. Once Freeze Stage 2 has been enacted, Appendix C will be completed and a rounds keeping log will be used to monitor parameters related to Freeze Stage 2. The rounds in Appendix D will be issued by the CRO and will be completed by the OMT every hour.

5.0 RESPONSIBILITIES

5.1 The Plant Manager is responsible for the effective implementation of this procedure.

5.2 The Plant Manager is responsible for ensuring that plant personnel are properly trained and qualified, as required, to implement this procedure.

5.3 The Control Room Operator (CRO) is responsible for assigning a properly trained and qualified Operations and Maintenance Technician (OMT) to implement this procedure in a safe and effective manner. The Control Room Operator (CRO) is responsible for completing and verifying all applicable checklists.

6.0 LIMITS AND PRECAUTIONS

6.1 Environmental – Store fuel for heaters in proper containers and lockers

6.2 Health & Safety – Be aware of hot surfaces. Always wear proper PPE equipment when working on or around plant equipment. Ice/Snow on some areas may cause slippery surfaces.

6.3 Regulatory - There are no Regulatory requirements associated with this procedure.

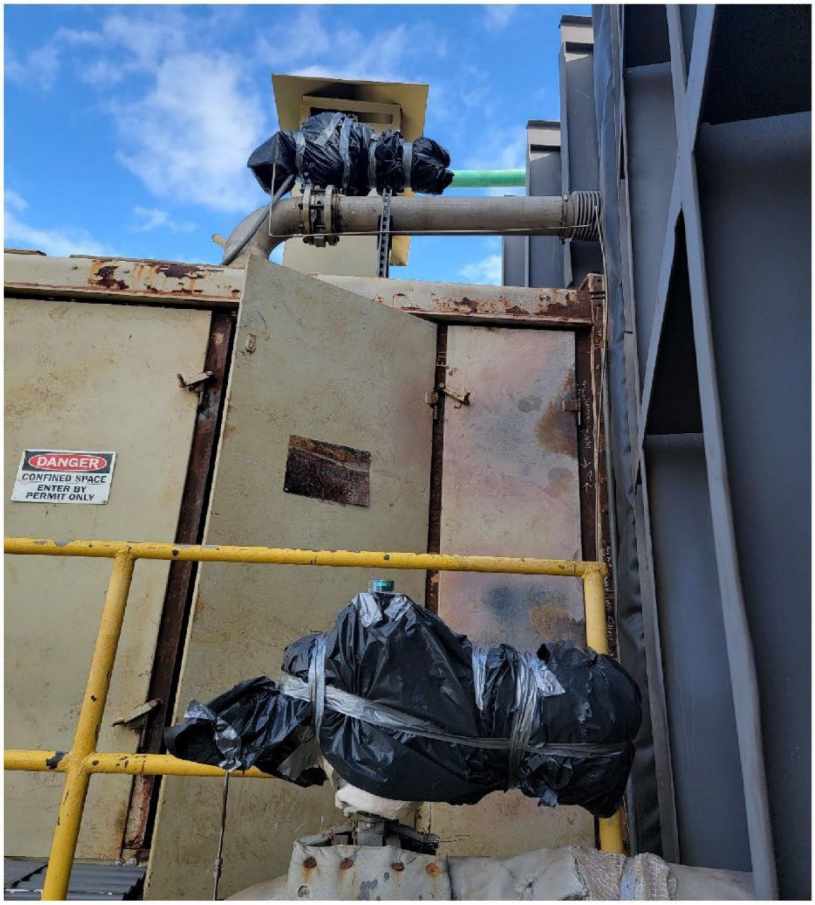
6.4 Operating Temperature Limits – GE does not provide a lowest acceptable operating temperature. PHR units 1-5 have successfully operated at 10°F (sustained) and PHR unit 6 has successfully operated at 37°F (sustained).

7.0 PROCEDURE

7.1 By November 1st have the following winterization preparations completed for Freeze Stage 0:

Complete the following IAW Appendix A "Freeze Stage 0 Winterization Checklist"

7.1.1 Compressor Bleed Valve insulation installed.



7.1.2 Purge Valve shelter and insulation installed.

7.1.3 480 volt portable heaters tested for proper operation.
a) Ensure heater is not an open flame heater.
b) Plug in portable heater into 480 volt receptacle.
c) Turn on portable heater to medium heat.
d) Wait 5 minutes and check for warm air from heater ensuring not to touch the heater.
e) Turn off, unplug, and stage heater for future use.

7.1.4 Gas Turbine Fuel Gas Building heaters tested for proper operation.
a) Turn on heater breaker.
b) Turn thermostat to max, wait 5 minutes, then check for heat coming from heaters ensuring not to touch the heater.
c) Return thermostat to 70°F.

7.1.5 Complete Freeze Stage 0 Winterization Checklist (Monthly) Appendix A

7.2 Freeze Stage 1 and 2 Rounds are located on the server under, G Drive → PHR Weatherization Plans → Winter Weatherization → PHR Freeze Stage 0 Winterization Checklist Appendix A.

Complete the following IAW Appendix D "Freeze Stage 1 and 2 Rounds"

7.2.1 CRO/OMT will ensure that all plant operators are trained in the operation and location of plant equipment listed in the procedure.

7.3 Coordinate with CRO on test procedure: The following will be performed with assistance from the OMT during Freeze Stage 1 conditions.

Complete the following IAW Appendix B "Freeze Stage 1 Winterization Checklist"

7.3.1 Bleed Valve Test
a) Perform Compressor Bleed Valve Test when unit is Offline, document in logbook.
b) OMT - Connect instrument air to inlet hose connection for Bleed Valves.
c) Select Unit to be tested on DCS
d) Select Maintenance Page from DCS
e) Select and change operating mode from "Auto" to "Off". No tests will initiate with the unit in "Auto"
f) CRO – Communicate to OMT to line up for supply air to CBV being tested.
g) CRO will initiate "Test On" on the DCS. OMT/CRO will verify in the field and DCS that both CBVs operate. Fully Closed/Fully Open. Stroke valves several times to verify proper operation. Document in logbook.
h) Positive results – Fully open (Green Indication) Closed (Red Indication).

7.3.2 Purge Valve Test
a) Perform Purge Valve Test Only When Unit Is Offline.
b) Using the HMI Select the GAS FUEL Screen.
c) Using the PURGE SYSTEM TEST select ON.
d) The Purge Valves VA13-1 & VA13-2 should uniformly stroke fully open in less than 30 seconds
e) Using the PURGE SYSTEM TEST select OFF.
f) The Purge Valves VA13-1 & VA13-2 should uniformly stroke fully shut in less than 30 seconds
g) Repeat test 3 times. Document in Logbook

h) Leave PURGE SYSTEM TEST in the OFF position when complete, VA13-1 & VA13-2 are shut.
i) Do a Master Reset and check to ensure all alarms & faults associated with this Test are reset.
j) Begin troubleshooting if valves do not stroke uniformly open & close in less than 30 seconds.
k) Select "Test Off"
l) Return unit from "Off" to "Auto"
m)Perform a "Master Reset" – Verify all alarms are reset. Document in logbook

7.4 Outside Plant Equipment Protection During Freeze Stage 1:

Complete the following IAW Appendix B "Freeze Stage 1 Winterization Checklist"

7.4.1 Purge Valve Shelter/Heat
a) Check shelter and insulation integrity.
b) Plug in portable heater into 480 volt receptacle.
c) Place heater in Purge Valve shelter.
c) Turn on portable heater to medium heat.
d) Wait 5 minutes and check for warm air from heater ensuring not to touch the heater. Document in logbook.

7.4.2 Compressor Bleed Valve Insulation
a) Check insulation integrity and add additional insulation if necessary.

7.4.3 Gas Turbine Fuel Gas Building/Heat
a) Turn on heater breaker in the Fuel Gas Building.
b) Turn thermostat to max, wait 5 minutes, then check for heat coming from heaters ensuring not to touch the heater.
c) Return thermostat to 70°F.
d) Check insulation integrity of the piping and add additional insulation if necessary. Document in logbook.

7.4.4 Lube Oil Cooler Spray Protection
a) Drain system to prevent freeze damage.
a) Block in supply water to spray system.
b) Drain water from filter/spray header.
c) Notify control room to document on board Unit # isolated from supply. Document in logbook.

7.4.5 Plant Eye Wash Station
a) Open eye wash to flow enough water to keep from freezing.

7.4.6 Open In-line moisture separators drain valve enough to ensure proper drainage of any accumulated liquid in bowl.

7.5 Outside Plant Equipment Protection During Freeze Stage 2

Complete the following IAW Appendix C "Freeze Stage 2 Winterization Checklist"

7.5.1 Winterization Log
a) Increase winterizations logs frequency to hourly.

7.5.2 Bellmouth Viewing Window
a) Inspect in bell mouth viewing window with a light source hourly to check for icing as listed in Appendix D Freeze Stage 2 Rounds.

8.0 RECORDS

8.1 Appendix A Freeze Stage 0 Winterization Checklist

8.2 Appendix B Freeze Stage 1 Winterization Checklist

8.3 Appendix C Freeze Stage 2 Winterization Checklist

8.4 Appendix D Freeze Stage 1 and 2 Rounds

8.5 Appendix E Weather Watch Checklist

8.6 Appendix F PHR Winter Weather Emergency Contact List

8.7 Appendix G PHR Winter Weatherization Training Sign In Sheet

9.0 TRAINING REQUIREMENTS

9.1 Personnel having responsibility assignments associated with this procedure shall be properly trained. All training shall be appropriately documented and maintained annually.

9.1.1 Once training is completed all attending personnel will sign and date Appendix G PHR Winter Weatherization Training Sign In Sheet.

Freeze Stage 0 Winterization Checklist

Appendix A

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed Monthly beginning November 1st of every year through March. Each component will be installed and verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

Check	Signature	Date
Purge Valve Shelter Installed		
CBV Insulation Installed		
480V Heater Staged and Tested		
Gas House Heaters Tested		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT1

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT2

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT3

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT4

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT5

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 1 Winterization Checklist

Appendix B

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

This checklist is to be completed whenever temperatures will reach 35F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

CT6

Check	Signature	Date
CBV Functional Test		
Purge Valve Functional Test		
Purge Valve Shelter Inspection		
Purge Valve Heater Turned On		
Gas House Heaters Turned On		
CBV Insulation Inspection		
LO Cooler Spray Off and Drained		
Cooler Filter Drained		
All Eyewash Stations Flowing		
Appendix D Logs Printed & in Use		

Notes

Upon completion of this checklist turn in to Plant Manager for review

Freeze Stage 2 Winterization Checklist

Appendix C

PH Robinson Peakers

5501 TX-146

Bacliff, TX 77546

Instructions

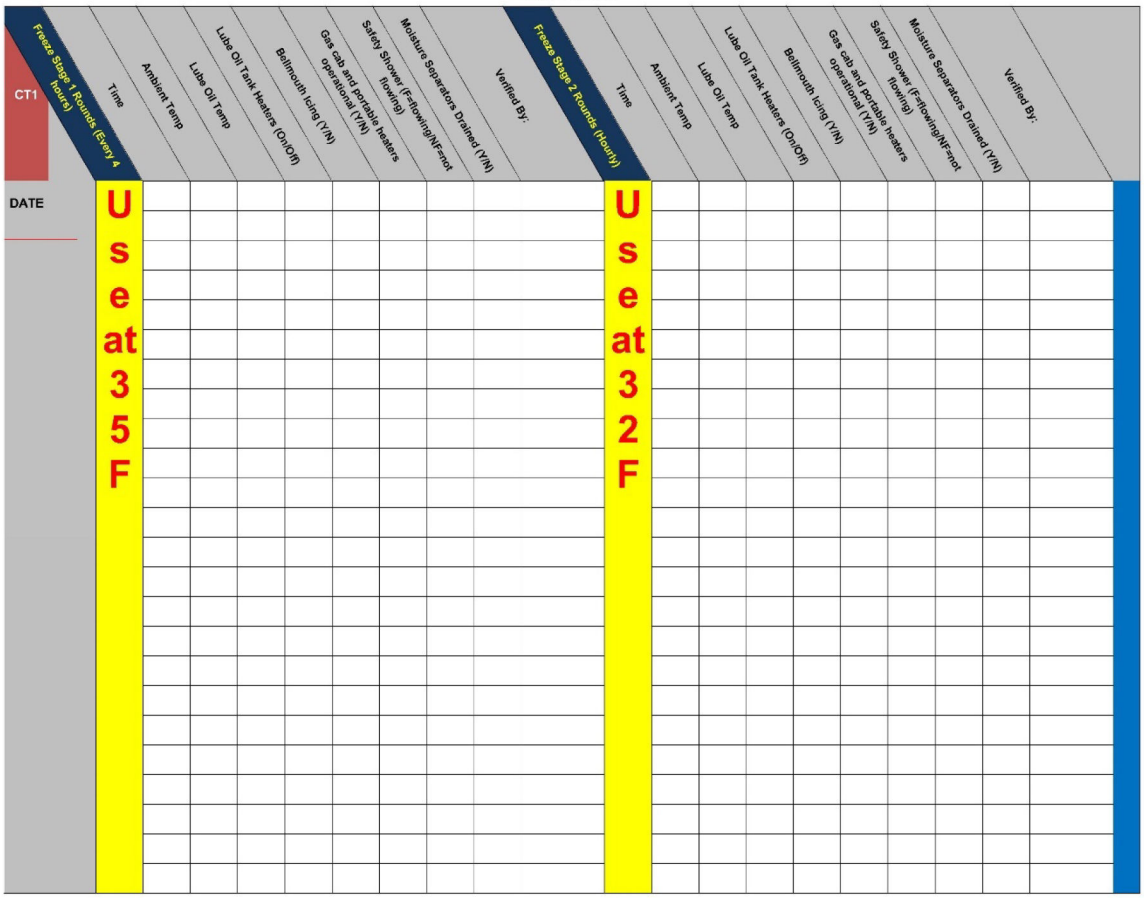
This checklist is to be completed whenever temperatures will reach 32F or below. Each component will be verified complete, signed off, and dated. This is a requirement of the Winterization Plan and will be saved for record keeping.

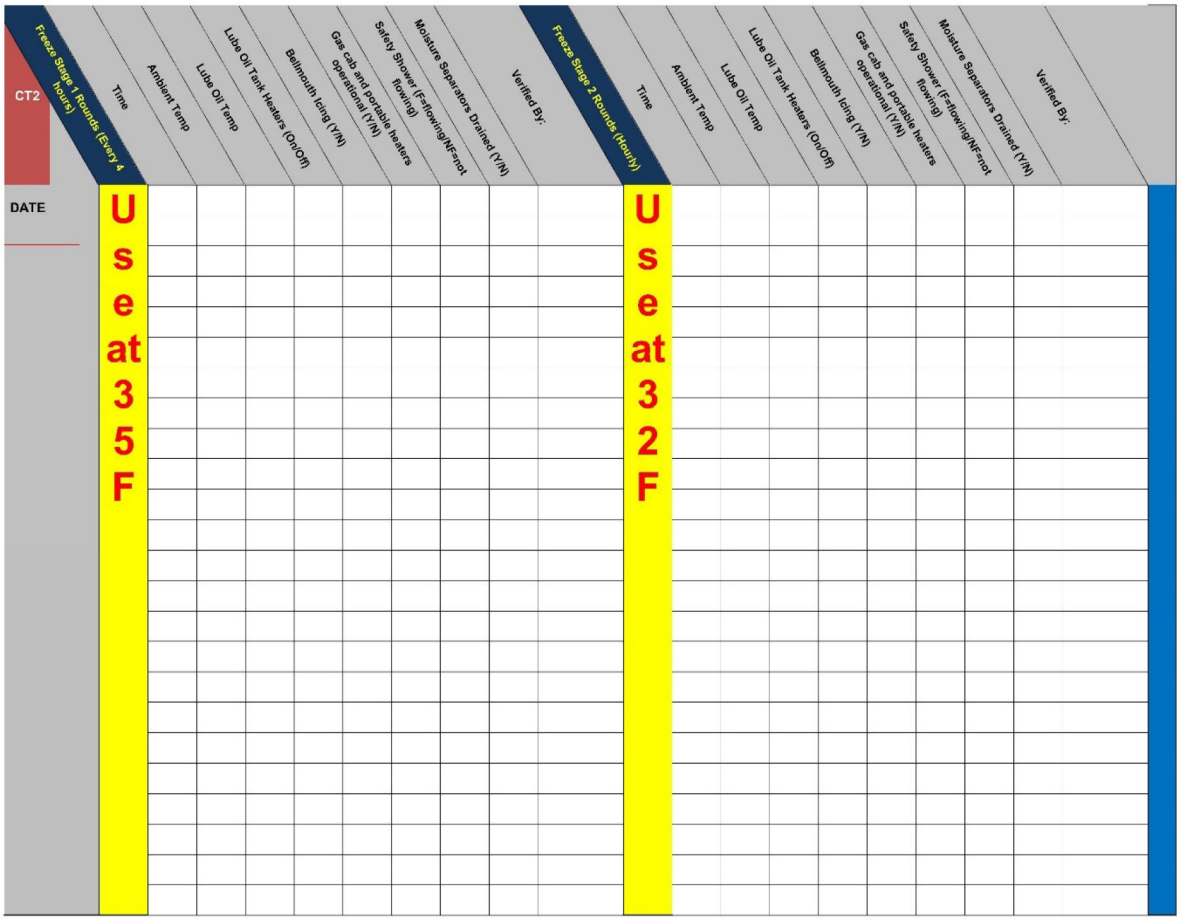
Check	Signature	Date
Hourly Winterization Logs Printed and in Use		
Check Bellmouth Window Hourly for Icing		

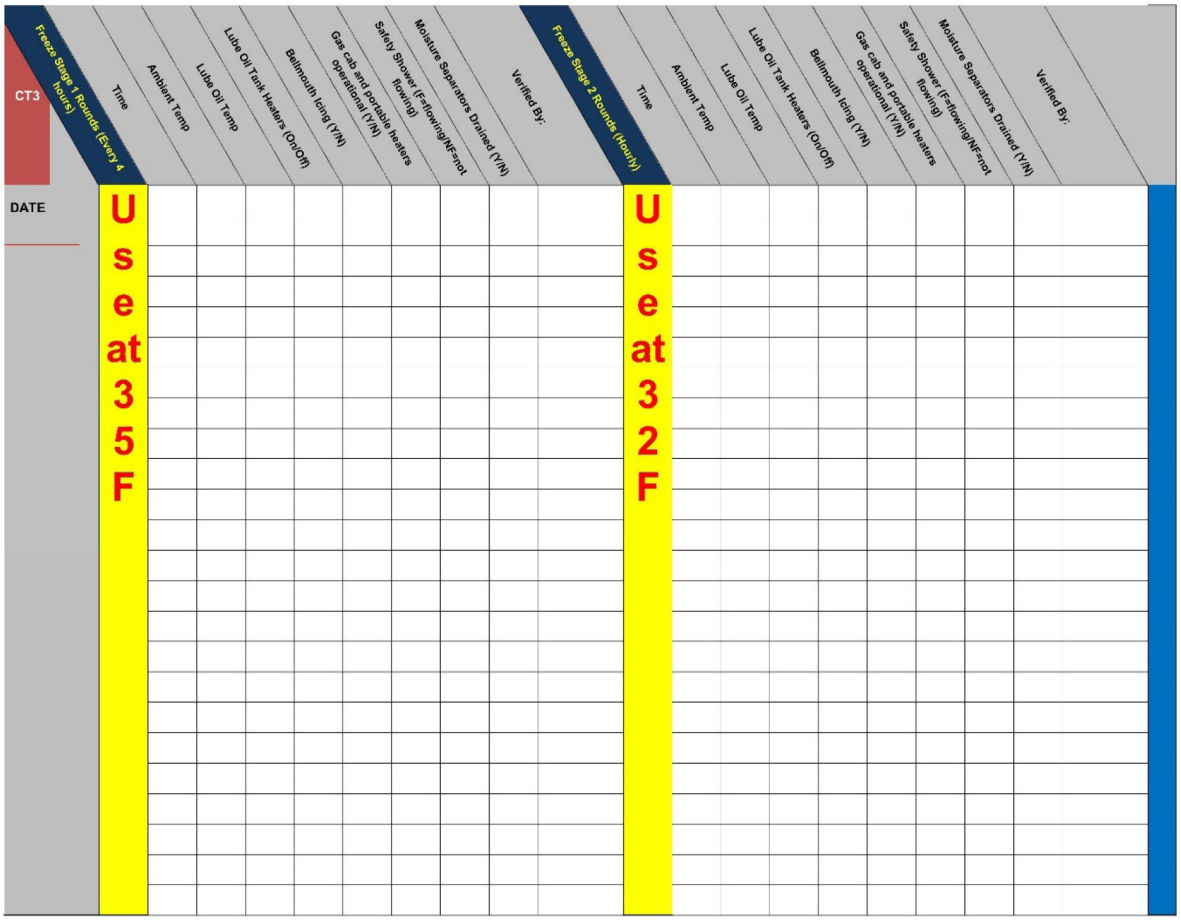
Notes

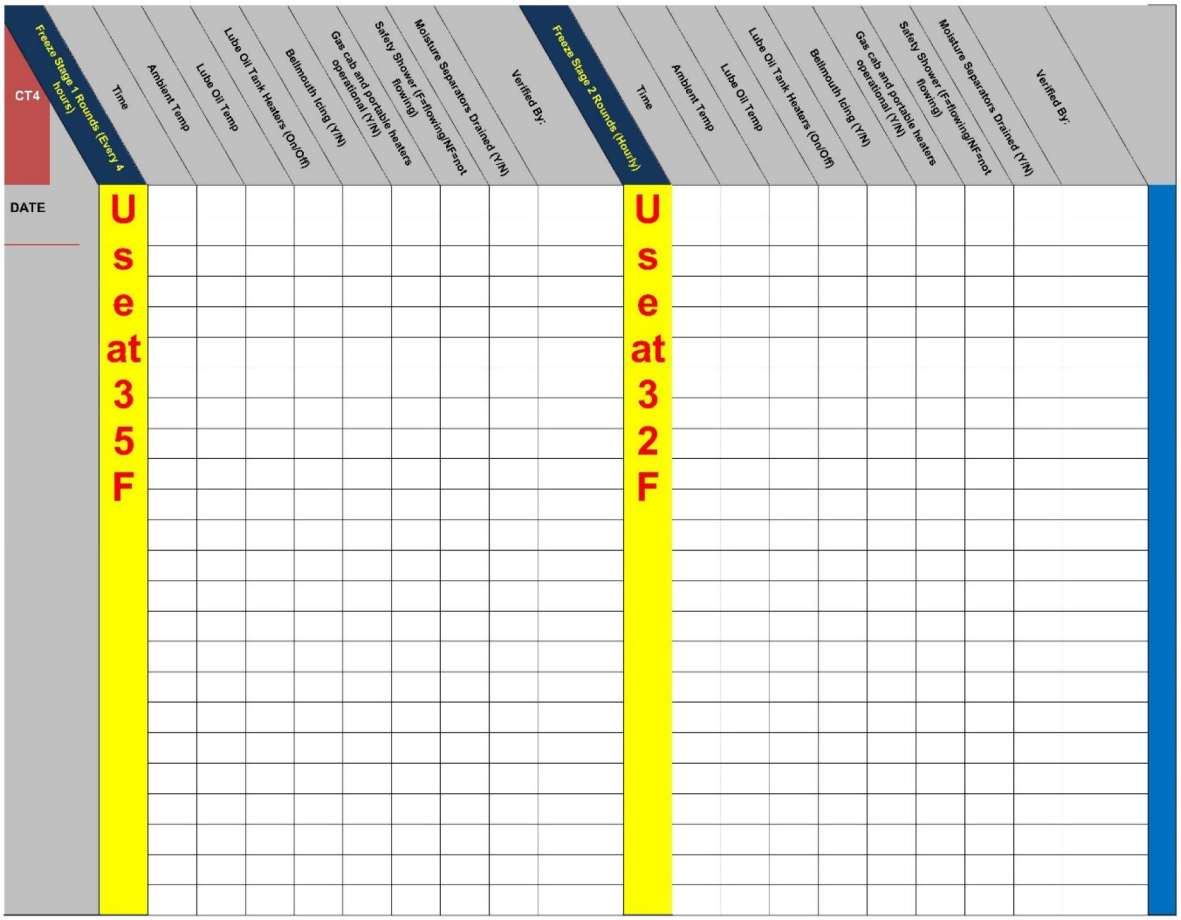
Upon completion of this checklist turn in to Plant Manager for review

Appendix D


CT1
DATE
Freeze Stage 1 Rounds (Every 4 hours)
Use at 35F
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Freeze Stage 2 Rounds (Hourly)
Use at 32F
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:


CT2
DATE
Freeze Stage 1 Rounds (Every 4 hours)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 35F
Freeze Stage 2 Rounds (Hourly)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 32F


CT3
DATE
Freeze Stage 1 Rounds (Every 4 hours)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 35F
Freeze Stage 2 Rounds (Hourly)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 32F


CT4
DATE
Freeze Stage 1 Rounds (Every 4 hours)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 35F
Freeze Stage 2 Rounds (Hourly)
Time
Ambient Temp
Lube Oil Temp
Lube Oil Tank Heaters (On/Off)
Bellmouth Icing (Y/N)
Gas cab and portable heaters operational (Y/N)
Safety Shower (F=flowing/NF=not flowing)
Moisture Separators Drained (Y/N)
Verified By:
Use at 32F