Filing Receipt

Filed Date - 2025-10-01 03:14:32 PM

Control Number - 53385

Item Number - 3791

EMERGENCY RESPONSE PLAN & EMERGENCY OPERATIONS PLAN

Bell Creek and Brazos River Battery Energy Storage Facilities

32310 N. State Highway 35 (Bell Creek) & 13726 State Highway 35 (Brazos River)
City of West Columbia, TX 77486
Brazoria County, Texas

PREPARED FOR

Semir Yousuf, Sr. Project Manager
Nexus Renewables Inc.
330 Bay St, Suite 600, Toronto, ON M5H 2S8
semir@nexusrenewables.ca

Project #:
Report #:
Date: March 5, 2025

PREPARED BY

Leonard Deonarine
Senior Director, Emergency Preparedness
Jensen Hughes, Inc.
10 S. Wacker Drive, Suite 1300
Chicago, IL 60606
361-739-3413
Leonard.deonarine@JensenHughes.com

JENSEN HUGHES

Preparer:	
Reviewer	
Review Method	☐ Design Review ☐ Alternate Calculation
Approver	

Revision Record Summary

Revision	*Revision Summary*
00	Initial Draft

Important Notice

This document serves as the Emergency Response Plan (ERP) and the Emergency Operations Plan (EOP) for the Bell Creek and Brazos River Battery Energy Storage Systems (BESS) projects. It provides guidelines and recommendations tailored to the specific needs of these BESS projects, including fire, thermal runaway, and electrical hazard emergency response scenarios. This ERP and EOP addresses the emergency response strategy and tactics for both Nexus Renewables Battery Energy Storage System facilities in West Columbia, Texas. The Bell Creek site is located at 32290 North Highway 35, West Columbia, Texas and the Brazos River site is located at 13726 State Highway 35 in Brazoria County. The Brazos River facility is sometimes referred to as being situated at 13726 Jimmy Phillips Blvd near the intersection of Jimmy Phillips Blvd and Patton Street.

The combined ERP/EOP addresses key requirements of 29 CFR 1910.38 and 16 Texas Administrative Code § 25.53. Some information in this plan was sourced from the National Fire Protection Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems, 2023 Edition, Annex G.11 Guidance on Developing a First Responder Plan for Lithium-Ion-Based (LIB) Energy Storage System (ESS) facility. The annex to the NFPA 855 consensus standard is not recognized as a required code or standard in Texas.

This ERP represents intended response actions. However, it is intended to afford initiative and flexibility to stakeholders and emergency responders with all prudence when addressing a related emergency event.

Table of Contents

Executive Summary

This Emergency Response Plan (ERP) and Emergency Operations Plan (EOP), developed by Nexus Renewables Inc. and Jensen Hughes, serves as a comprehensive guide for emergency responders, facility management personnel, and other relevant stakeholders. It provides a structured framework for emergency preparedness and response at the Nexus Bell Creek and Brazos River Battery Energy Storage System (BESS) facilities.

These utility-scale facilities ,utilize lithium iron phosphate (LFP) battery technology to support grid stability and reliability while participating in the ERCOT (Electric Reliability Council of Texas) market for ancillary services . Recognizing the unique, complex, innovative, and evolving nature of BESS-related hazards, this document consolidates essential safety, operational, and emergency response information into specific, actionable guidelines.

The primary aim is of the ERP/EOP is to safeguard personnel and minimize property damage during various emergency scenarios, including fires, thermal runaway incidents, electrical hazards, and other potential emergencies intrinsic to or associated with the BESS infrastructure. Aligned with industry best practices, the plan outlines details strategic emergency response actions and coordination protocols with local emergency services to ensure a swift and coordinated response to any incident. The ERP provides essential safety and emergency response information for BESS facilities. Designed for site personnel and local emergency responders and facility personnel, it outlines procedures for addressing emergencies involving the BESS facility, providing a clear framework for swift, coordinated, and effective responses to protect life, property, and the environment.

A central component of the ERP is to emphasize regular, targeted training and drills for both facility staffs and local emergency responders. These exercises enhance familiarity with the characteristics of the BESS systems, enhance the proficiency of all involved in emergency procedures, and ensure that the ERP protocols are not only theoretically robust but also operationally effective during real-world scenarios.

Moreover, the ERP is a dynamic document subject to regular reviews and updates based on evolving best practices, technological advancements, regulatory changes, and lessons learned from drills, training and real incidents. This approach ensures that the ERP remains current and continues to effectively mitigate risks associated with the operation and emergency response of the BESS facility.

The integrated EOP consolidates the requirements of 16 Tex. Admin. Code § 25.53 with the ERP to form a unified document for the approach to emergency response and operations. The table below details the locations within the combined ERP/EOP document where each EOP requirement is addressed. Importantly, since this plan covers two facilities with similar footprints and identical BESS technologies, all sections of the plan, with the exception of facility specific subsections (2.1, 2.2, 3.2, and 3.3), shall apply to both facilities.

Table 0-1: Emergency Operations Plan Requirements

EOP Requirement	T.A.C 25.53 Citation(s)	EOP Section(s)
Filing Requirements	(c)(1)	Section 8.0 Summary of Annual and Filing Requirements
Executive Summary	(c)(1)(A)(i)	Executive Summary
Annual Update	c(3-4)	Section 8.0 Summary of Annual and Filing Requirements

Introduction and Applicability	(d)(1)(A)	Section 1.0 Introduction
Individuals who maintain, implement, and can change the plan	(d)(1)(B)	Subsection 2.3 Emergency Contact Information
Revision Control, Supersede, and Approval	(d)(1)(C-E)	Section 11.0 Revision History
Emergency Supplies List	(d)(3)	Subsection 5.6 Emergency Resources and Equipment
Emergency Staffing Plan	(d)(4)	Subsection 5.6.6 Emergency Staffing
Weather-related hazard identification	(d)(5)	Weather Emergency Annex
Pandemic and epidemic annex	(e)(4)(A)	Pandemic and Epidemic Annex
Weather emergency annex	(e)(4)(B)	Weather Emergency Annex
Hurricane annex	(e)(4)(C)	Hurricane annex
Cybersecurity annex	(e)(4)(D)	Cybersecurity annex
Physical security annex	(e)(4)(E)	Physical security annex
Additional Annexes	(e)(4)(F)	No additional annexes identified as necessary
Drills	(f)	Section 7.0 Drills
Reporting Requirements	(g)	Section 8.0 Summary of Annual and Filing Requirements

Acronyms and Abbreviations

AHJ	Authorities Having Jurisdiction	PUCT	Public Utility Commission of Texas
AVS	Active Ventilation System	RBMS	Rack Battery Management System
BESS	Battery Energy Storage System	RPN	Risk Priority Number
BBMS	Battery Bank Management System	SCBA	Self-Contained Breathing Apparatus
BMS	Battery Management System	SDS	Safety Data Sheets
BSC	Battery System Control	SME	Subject Matter Expert
DC	Direct Current	SMPS	Switch Mode Power Supplies
DS	Disconnected Switch	SPD	Surge Protective Device
ERCOT	Electric Reliability Council of Texas	TDEM	Texas Division of Emergency Management
EOP	Emergency Operations Plan	UL	Underwriters Laboratory
ERP	Emergency Response Plan	UPS	Uninterruptible Power Supply
ESS	Energy Storage System		
ESMS	Energy Storage Management System		
FCP	Fire Control Panel		
HAZMAT	Hazardous Materials		
ICC	International Code Council		
ITM	Inspection, Testing, and Maintenance		
LFL	Lower Flammability Limit		
LFP	Lithium Iron Phosphate		
Li-Ion	Lithium Ion		
OPUC	The Office of Public Utility Counsel		
NFPA	National Fire Protection Association		
NMC	Nickel Manganese Cobalt		
MCCB	Molded Case Circuit Breaker		
PPE	Personal Protective Equipment		
RBMS	Rack Battery Management System		

1.0 Introduction

1.1 PURPOSE AND FRAMEWORK

The following emergency response procedures are provided to ensure that that all local fire department personnel, emergency personnel, contract staff, and Nexus personnel understand the protocols that are to be followed, to be prepared for, and to provide quick and effective response to emergencies that might arise at the Bell Creek or Brazos River Battery Energy Storage System (BESS) facility. Because the safety of employees is a primary concern, each member of the Nexus staff is committed to providing a safe, healthy work environment and is responsible for ensuring the effective implementation of these procedures.

The purpose of an Emergency Response Plan (ERP)/Emergency Operations plan (EOP) for the BESS projects is to provide a set of recommended guidelines for addressing emergencies involving the BESS facility.

The plan includes strategies for BESS-related emergency scenarios such as fires, thermal events, and electrical hazards, and outlines recommended practices for safe system shutdown, emergency response actions, and coordination with emergency response teams. Additional emergencies that may occur at each facility, but that are not specific to BESS facility are also included.

Recognizing the complexity and variability of emergencies, these guidelines are developed to be adaptable and informative rather than prescribing a rigid, step-by-step procedure. This approach allows emergency responders and facility personnel to apply their expertise and judgment in responding to incidents, ensuring effectiveness and flexibility in emergency response.

Both the Bell Creek and Brazos River sites are designed to function as an unstaffed, normally unoccupied, facilities. Site functionality is monitored remotely by the manufacturer of the BESS containers, Fluence, under an ongoing service/support contract. Personnel occupancy of either site is infrequent, and in the event the site is occupied, activities are generally isolated to routine maintenance.

1.2 TRAINING AND AWARENESS

The Emergency Response Plan underscores the critical role of training and awareness in preparing facility staff and local emergency responders to effectively manage BESS-related emergencies. It is essential to highlight that this document outlines the need for such training and awareness programs but does not delve into the specifics of training content or methodologies.

To ensure comprehensive preparedness, we recommend that emergency responders and facility staff training are aligned with established external programs and documented best practices. This may involve participation in training programs developed by recognized industry bodies, adherence to standards set forth by organizations such as the NFPA, or engagement with specialized training modules designed to address the unique challenges of BESS operations.

The goal is to foster a well-informed and proficient response team capable of confidently navigating the complexities of BESS emergencies. To this end, stakeholders are encouraged to seek out and participate in relevant training opportunities, ensuring ongoing readiness and adaptability to the evolving landscape of BESS technology and safety protocols.

In keeping with International Fire Code requirements, after the initial training program completion, refresher training should be conducted at least once a year for all staff. Additionally, personnel designated to interact

with local, state, and federal emergency management officials shall receive the latest IS-100, IS-200, IS-700, IS-800 National Incident Management System (NIMS) training courses.

Documentation and records of training and distribution are required on an annual basis (See **Section 8.0**).

1.3 DOCUMENTATION AND ACCESSIBILITY

The ERP/EOP includes emergency guidelines, contact information, site maps, and specific hazard mitigation strategies relevant to the BESS facility. The documentation is structured in a way that is easy to follow during emergencies.

The ERP/EOP should undergo a formal review at least annually and after any significant change to the facility or its operations, or after an emergency that tested the plan's effectiveness. This ensures the plan remains current with the latest safety standards, technological advancements, and lessons learned from drills or emergencies.

Copies of the ERP/EOP should always be readily available to facility operations and maintenance personnel. This can include digital access through the facility's internal network, and physical copies stored in strategic locations known to all staff members.

In addition to facility personnel, a copy of the ERP/EOP should be stored in an approved location where it can be easily and quickly accessed by Authorities Having Jurisdiction (AHJs) and emergency responders. This may involve sharing the document with local fire and emergency services to ensure they are familiar with the facility layout and ERP protocols before an emergency occurs.

2.0 Facility Information

Nexus Renewables Inc. is developing two battery energy storage system (BESS) facilities in West Columbia, TX. The facilities, named Bell Creek and Brazos River, share the same battery storage technology manufactured by Fluence. The BESS facilities use Fluence Gridstack™ Pro 5000 4888 kWh containerized units. Each container's total energy capacity is rated at 4888 kWh. The specific battery technology used is lithium iron phosphate (LFP) cells with a graphite anode. Each containerized battery unit will be housed in modular metal containers.

2.1 BELL CREEK

Nexus Renewables Inc. is developing the Bell Creek Facility at 32310 State Highway 35, West Columbia, TX. Bell Creek will have a 200 MW/ 745 MWh battery energy storage system (BESS) facility in West Columbia, TX. The BESS facility uses 183 Fluence Gridstack™ Pro 5000 4888 kWh containerized units. In addition to the containerized battery enclosures, the facility will be equipped with 61 power conditioning systems and one main transformer. General project information is summarized in Table 2-1.

Table 2-1: Project Information

Facility Name	Bell Creek BESS – West Columbia, TX
Facility Owner	Nexus Renewables Inc.
Physical Address, City and State	32310 N. State Highway 35, West Columbia, TX 77486

Battery Chemistry	Lithium iron phosphate (graphite cathode)
Design Basis System Output	745 MWh (200 MW for 3h, and 4888 kWh per container)
BESS Function	Utility scale energy storage for ancillary services
System Configuration	Outdoor Enclosure

2.2 BRAZOS RIVER

Nexus Renewables Inc. is developing the Brazos River Facility at 13726 State Highway 35, West Columbia, TX 77486. An alternative address for this site that works well with some mapping applications is 13726 Jimmy Phillips Blvd, (Near Patton Street) West Columbia, TX 77486. Brazos River will have a 180 MW/ 669MWh battery energy storage system (BESS) facility in West Columbia, TX. The BESS facility uses 164 Fluence Gridstack™ Pro 5000 4888 kWh containerized units. In addition to the containerized battery enclosures, the facility will be equipped with 55 power conditioning systems and one main transformer. General project information is summarized in Table 2-2.

Table 2-2: Project Information

Facility Name	Brazos River BESS – West Columbia, TX
Facility Owner	Nexus Renewables Inc.
Physical Address, City and State	13726 State Highway 35, West Columbia, TX 77486
Battery Chemistry	Lithium iron phosphate (graphite cathode)
Design Basis System Output	669 MWh (180 MW for 3h, and 4888 kWh per container)
BESS Function	Utility scale energy storage for ancillary services
System Configuration	Outdoor Enclosure

2.3 EMERGENCY CONTACT INFORMATION

Table 2-3 provides essential contact information as a reference for both facility personnel and emergency responders, facilitating quick and effective communication during emergencies. Both the primary and secondary emergency contact are responsible for maintaining and implementing this combined ERP/EOP document. Both individuals are authorized to make changes to the plan.

Table 2-3: Emergency Contact List

Emergency Contact Type	Name/Entity	Contact Information
Emergency Contact	Semir Yousuf	Main (416) 697-7242 Email semir@nexusrenewables.ca
Secondary Emergency Contact	Faizan Farooqi	Main 647-622-7614 Email faizan@nexusrenewables.ca
Local Fire & Rescue Service	West Columbia Volunteer Fire Department 3 miles from facilities	Emergency 911 Non-emergency (979) 345-3416
Medical Facility	West Columbia Health Clinic 3 miles from facilities	Main (979) 345-2525
Local Emergency Department	Sweeny Community Hospital 6 miles from facilities	Emergency 911 Non-emergency (979) 548-1500
Police Department	West Columbia City Police 3 miles from facilities	Emergency 911 Non-emergency (979) 345-5121

2.4 FIRE & RESCUE/EMERGENCY RESPONSE COOPERATION

Nexus Renewables Inc. is committed to involving local emergency personnel in emergency response planning and training. Nexus personnel will reach out to the responding fire department(s) on an annual basis to communicate any changes to the ERP/EOP. Local emergency organizations will also be invited to select emergency response training sessions/exercises.

3.0 Site Mapping and Documentation

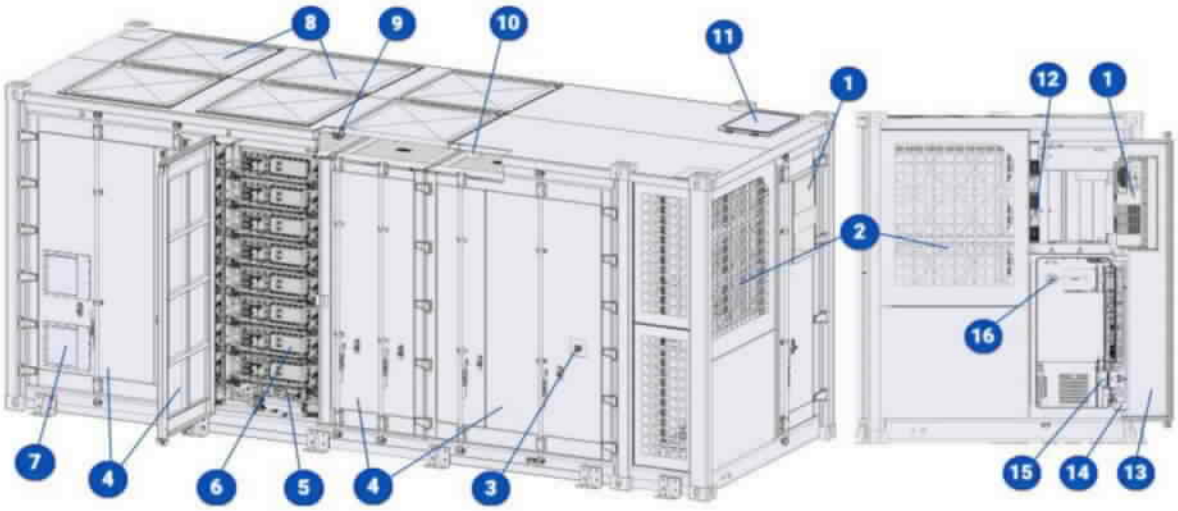
This section provides a visual representation of the BESS facility, facilitating an understanding of its layout, critical infrastructure, and operational dynamics in the context of emergency response and safety management. It is designed to aid both facility personnel and emergency responders in navigating the site effectively during emergencies.

3.1 BESS EQUIPMENT DESCRIPTION

The Gridstack™ Pro 5000 system provided by Fluence is composed of 48 battery modules stored in a container measuring approximately 6.6 m x 2.4 m x 2.9 m. Each battery container unit is equipped with additional critical accessories serving functions such as cooling and electrical interconnections that increase the overall footprint of the unit. Figure 3-1 below shows the Gridstack™ Pro 5000 battery container without any required accessories.

Figure 3-1 Gridstack™ Pro 5000

With the addition of the aforementioned components, the footprint of the Gridstack™ Pro 5000 module can be visualized as shown in Figure 3-2. The figure gives representations of safety features that are present on the Gridstack™ Pro 5000 system such as: a DC disconnect switch, emergency control circuit (fast stop, F-stop), deflagration panels, and combustible gas reduction ventilation system.



1. HVAC
2. Chiller Compartment
3. F-Stop
4. Enclosure Door
5. DCPM
6. Battery Module
7. Inlet Louver
8. Deflagi nel x 6
9. Multi Detectors x 4
10. H2 Gas Detector x 2
11. Vent Panel
12. UPS
13. Enclosure Side Door
14. BCP Door
15. Enclosure Controller
16. DC Disconnect Switch

Figure 3-2 Representative Model Gridstack™ Pro 5000

Although the units are equipped with fire detection, fire prevention, and explosion protection features, the units are not equipped with fire protection such as an extinguishing agent.

3.2 BELL CREEK

The Bell Creek Facility project is to be located off of Texas State Highway 35 in West Columbia, TX. Emergency responder access to the facility is available directly from the highway via a 24-ft-wide, crushed limestone access road. After exiting the highway to the entrance of the facility, emergency responders will come upon the facility gate and fencing. To provide access to emergency responders, a Knox box, serving as a rapid access key vault, is to be installed near the main facility gate. The keys stored in the Knox box can be used to unlock the main gate and the locks on any other gates to the facility. Access to the facility without Nexus personnel present is not recommended. In cases, such as medical emergencies, access to the facility can be made by first responders while in direct phone communications with Nexus emergency contacts.

3.2.1 Aerial View

Figure 3-3 below shows the planned facility layout for Bell Creek and primary emergency responder access route, indicated by the yellow arrows tracing. The access road also serves as the primary evacuation route for Nexus personnel and visitors. During an emergency evacuation personnel will rally where the access road meets the highway. At that time, the senior staff member on-site will determine if everyone successfully evacuated the facility.

Figure 3-3: Aerial Overview of Bell Creek BESS

3.2.2 Site Overview

The Bell Creek site consists of a leased area of approximately 15 acres. There will be 183 Gridstack™ Pro 5000 BESS containers, 61 battery inverters with medium-voltage (MV) transformers, Core Support Enclosures (CSE), and auxiliary electrical equipment located on approximately . 5 acres on the northwest side of the site. Additionally, an approximately 4-acre area in the southwest of the site houses the substation for the facility which consists of high-voltage equipment including the Main Power Transformer (MPT) and breakers. Finally, immediately west of the substation, an approximately 4-acre area is dedicated to the facility's switchyard.

The BESS containers at the facility are set back approximately 100 feet from the property boundary. The surrounding area is largely undeveloped with a sparse distribution of single-family residences. Access to the property is via a 24-ft-wide, crushed limestone access road connecting the facility to Texas State Highway 35. Both personnel and emergency responders must enter through this road. Figure 3-4 highlights (red) the

roads within the facility that may be used by emergency responders. The roads within the site are also constructed with crushed limestone and are approximately 24 ft wide.

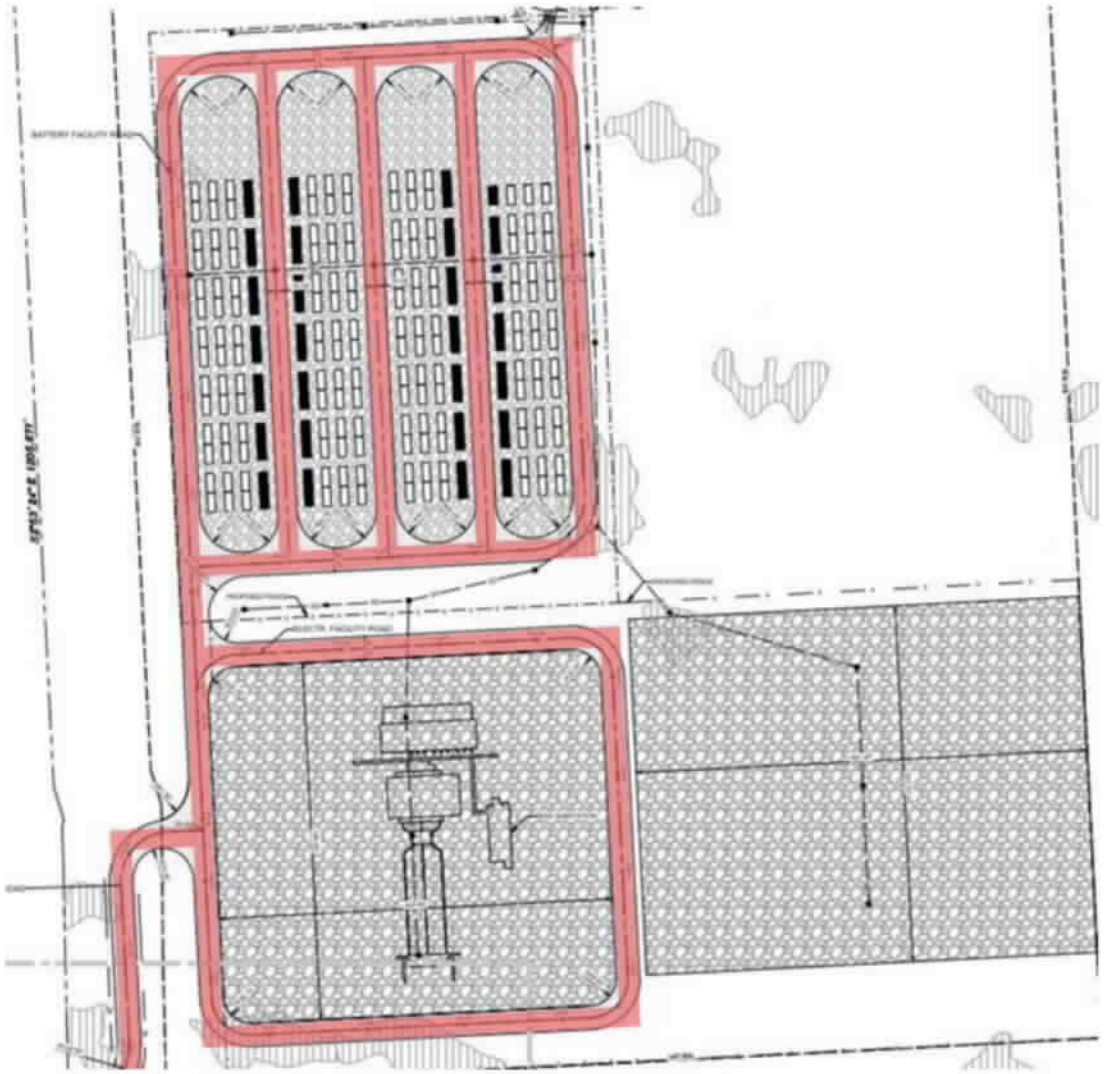


Figure 3-4: Detailed Roads Map for Bell Creek BESS in West Columbia, TX

After emergency personnel, such as the fire department, access the site, the roads within the site will facilitate access to each group of BESS containers. It is recommended that fire department responders position fire apparatus at a location that is at least 200 feet from any fire involved BESS container. A best practice is to select a position that is upwind and outside the 200-foot distance such that the fire truck operator's exposure to hazards is reduced.

3.2.3 Water Supply

Fire hydrants are not available at the site. Upon request of the fire department, Nexus Renewables would truck in water to assist the fire department.

3.3 BRAZOS RIVER

The Brazos River Facility project is to be located off of Texas State Highway 35 in West Columbia, TX. Emergency responder access to the facility is available directly from the highway via a 24-ft-wide, crushed limestone access road. After exiting the highway to the entrance of the facility, emergency responders will come upon the facility gate and fencing. To provide access to emergency responders, a Knox box, serving as a rapid access key vault, is to be installed near the main facility gate. The keys stored in the Knox box can be used to unlock the main gate and the locks on any other gates to the facility. Access to the facility without Nexus personnel present is not recommended. In cases, such as medical emergencies, access to the facility can be made by first responders while in direct phone communications with Nexus emergency contacts.

3.3.1 Aerial View

Figure 3-5 below shows the planned facility layout for the Brazos River site and primary emergency responder access route, indicated by the yellow tracing. The access road also serves as the primary evacuation route for Nexus personnel and visitors. During an emergency evacuation personnel will rally where the access road meets the highway. At that time, the senior staff member on-site will determine if everyone successfully evacuated the facility.

Figure 3-5: Aerial Overview of Brazos River BESS

3.3.2 Site Overview

The Brazos River site consists of a leased area of approximately 20 acres. There will be 164 Gridstack™ Pro 5000 BESS containers, 55 battery inverters with medium-voltage (MV) transformers, Core Support Enclosures (CSE) and auxiliary electrical equipment located on approximately 4.6 acres on the east side of the site. Additionally, an approximately 3.2-acre area in the southwest of the site houses the substation for the facility. Finally, immediately north of the substation on the west side of the facility, an approximately 2.7-acre area is dedicated to the facility's switchyard.

The BESS containers at the facility are set back approximately 300 feet from the property boundary. The area surrounding the area is largely undeveloped with a sparse distribution of single-family residences. A small neighboring industrial facility borders the southwest side of the facility. Access to the property is via a 24-ft-wide, crushed limestone access road connecting the facility to Texas State Highway 35 which is also known as Jimmy Phillips Blvd. Both personnel and emergency responders must enter through this connected road. Figure 3-6 highlights (red) the roads within the facility that may be used by emergency responders. The roads within the site are also constructed with crushed limestone and are approximately 24 ft wide.

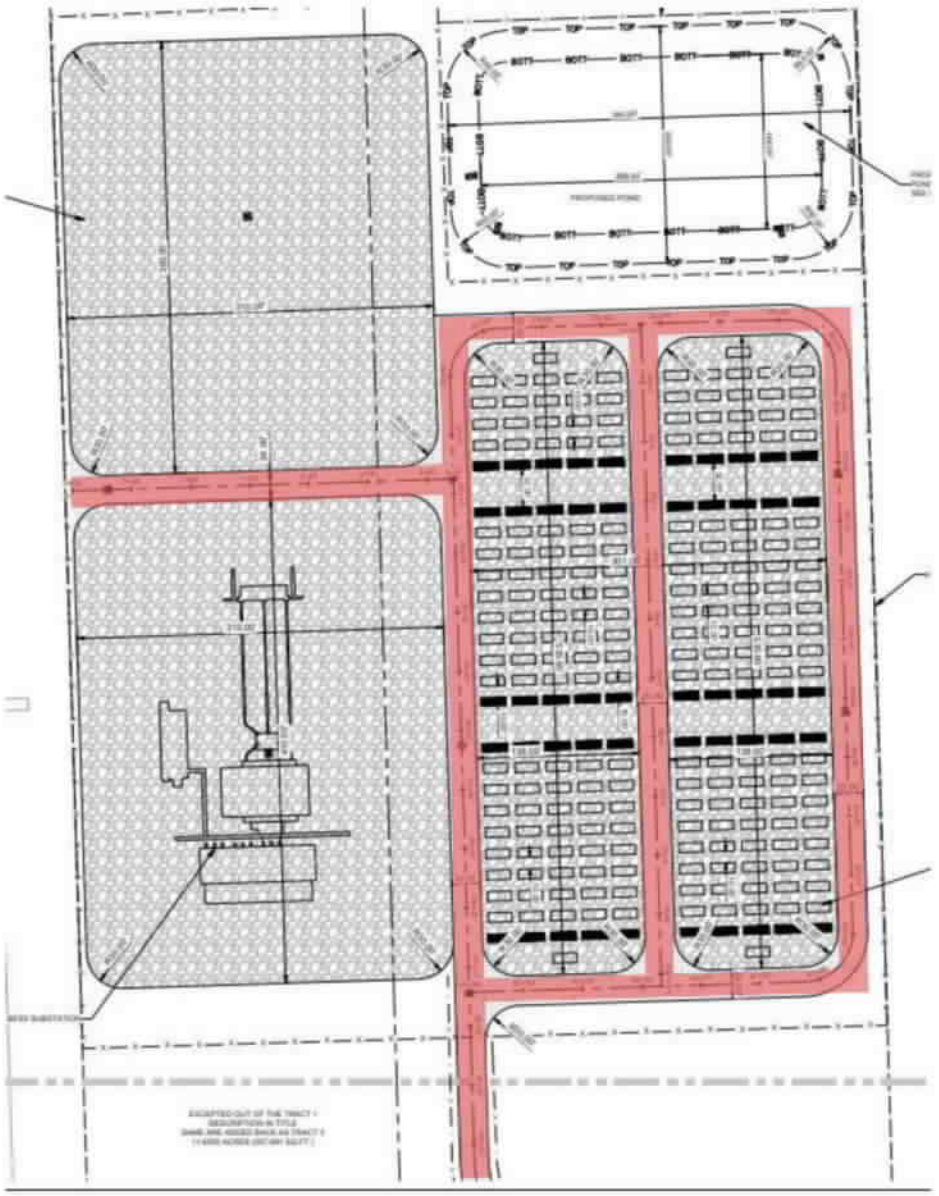


Figure 3 4: Detailed Roads Map for Brazos River BESS in West Columbia, TX

After emergency personnel, such as the fire department, access the site, roads within the site facilitate access to each group of BESS containers. It is recommended that fire department responders position fire apparatus at a location that is at least 200 feet from any fire involved BESS container. A best practice is to select a position that is upwind and outside the 200-foot distance such that the fire truck operator's exposure to hazards is reduced.

3.3.3 Water Supply

Fire hydrants are not available at the site. Upon request of the fire department, Nexus Renewables would hire a company to bring in water by truck to assist the fire department.

4.0 Battery System Hazards and Precautions

This section outlines general safety precautions and identifies potential hazards associated with the BESS facility. It provides sample wording that serves as a guideline for facility personnel and emergency responders to understand and mitigate BESS-related emergencies effectively.

4.1 LITHIUM-ION (LI-ION) BATTERIES HAZARDS

Energized lithium-ion (Li-Ion) batteries are located within BESS racks housed within the BESS facility. These batteries pose electrical, thermal, and explosion hazards, and will remain energized even when the BESS is disconnected from external power sources (e.g., generating station or power grid). It is extremely unlikely that the BESS will be fully de-energized during an event, and it should always be assumed to contain hazardous energy. No access should be made into the BESS containers without authorization and verification that conditions are safe for access.

4.2 THERMAL RUNAWAY RISKS

Thermal runaway refers to the uncontrolled increase of temperature and build-up of heat within the Li-Ion battery. This can be triggered by battery damage or defects, exposure to heat, electrical malfunction, or internal faults, resulting in a rapid and self-sustaining increase in temperature. Thermal runaway can potentially lead to the venting of flammable gases and fire conditions that require copious amounts of water to extinguish. Smoke from thermal runaway is highly toxic and should be avoided. Flammable off-gassing and re-ignition potential increase the risk of explosion.

4.3 ENERGIZED DEFLAGRATION AND EXPLOSION POTENTIAL

Hydrogen, methane, carbon monoxide, and other flammable gasses are released from Li-Ion batteries during thermal runaway. These gases may build up within the BESS facility. Without proper ventilation, an explosive atmosphere may be created. Opening or accessing ESS containers after a thermal runaway event should be done after the container has been fully ventilated. The introduction of oxygen into the BESS container while an explosive atmosphere is present can lead to a deflagration or explosion.

NO ACCESS should be made into the BESS facility or surrounding area without Nexus Renewables site authorization and verification that conditions are safe for access.

4.4 ELECTRICAL HAZARDS

Most electrical components, within the BESS facility, are contained within the equipment enclosures. However, some connections and circuits are not protected and could expose facility personnel and firefighters to an electrical or shock hazard.

CONSIDER all equipment ENERGIZED until CONFIRMED DE-ENERGIZED, GROUNDED, and SAFE by QUALIFIED Nexus Renewables personnel.

The batteries in a BESS are NEVER FULLY DISCHARGED. Even when a BESS is shut down, the batteries still contain stored energy corresponding to the state of charge at the time it was shut down. Consult with Nexus Renewables personnel before applying water to BESS equipment.

Use of Firefighting Water on Energized Electrical Equipment Could Be Hazardous to Firefighters. The utilization of installed systems is preferred (see Section 5.0). Exercise caution when putting handlines in service.

DO NOT USE metal ladders or other metal firefighting tools (pike poles, axes, Halligan bars, etc.) around high voltage equipment, as they can be CONDUCTIVE.

4.5 ADDITIONAL HAZARDS

This section outlines additional potential hazards associated with BESS facility operation and provides guidelines for precautionary measures to mitigate these risks effectively.

Table 4-1: Additional Hazards and Precautionary Measures for BESS Installation.

Hazard Type	Description	Precautionary Measures
Chemical Hazards	BESS facility may contain hazardous chemicals that pose risks if released.	Evacuate the area, use appropriate PPE, and engage HAZMAT teams for containment.
Environmental Hazards	Potential for environmental contamination affecting soil and water quality.	Implement spill containment strategies, monitor environmental impacts, and collaborate with environmental agencies for cleanup.
Mechanical Hazards	Risks associated with structural failures or mechanical issues.	Conduct regular inspections, clearly mark exits/routes, and train personnel on evacuation procedures.
Firefighting Water Runoff	The use of water in firefighting can create contaminated runoff.	Contain and test runoff water for hazardous materials and safely dispose of or treat contaminated water.
Respiratory Hazards	Release of toxic gases and particulates during incidents.	Use self-contained breathing apparatus (SCBA) gear, evacuate or issue shelter-in-place orders based on air quality, and monitor air quality post-incident.
Emergency Deactivation Risks	Incorrect deactivation of BESS units can exacerbate situations.	Follow specific deactivation protocols, ensure emergency shutoffs are accessible, and verify safety conditions with qualified personnel before and after deactivation.
Energy Storage System Re-Energization	Careful assessment is required before re-energizing a BESS post-incident.	Perform a comprehensive system inspection, collaborate with manufacturers/engineers for integrity assessments, and monitor closely during gradual re-energization.

Note: Awareness and training addressing these additional hazards and their precautionary measures are crucial for all personnel, including emergency responders and facility staff. Maintaining safety and preparedness requires regular reviews, updates of ERP, and drills.

5.0 Emergency Response Guidelines

This section provides a structured approach to managing emergencies specific to the BESS facility. It provides sample wording that details safety precautions and response actions to guide facility personnel and emergency responders through potential emergency scenarios.

5.1 GENERAL BESS EMERGENCY GUIDELINES

5.1.1 Risk Assessment and Initial Actions

Upon detecting an emergency or receiving an alarm/alert from the BESS facility, Nexus should work with Fluence to conduct an immediate preliminary risk assessment. If the alarm/alert is an emergency, notify the Nexus facility management and activate the ERP/EOP. In cases of fire alarm activation, hydrogen alarms, automatic ventilation system activation, fires, or any other appropriate emergency, request the fire department by calling 911. Communicate the situation to all relevant personnel and emergency responders, so that the West Columbia Fire & Rescue incident commander has the best possible understanding of the situation.

CONSIDER all equipment ENERGIZED until CONFIRMED DE-ENERGIZED, GROUNDED, and safe by QUALIFIED Nexus personnel.

The batteries in a BESS are NEVER FULLY DISCHARGED. Even when a BESS is shut down, the batteries still contain stored energy corresponding to the state of charge at the time it was shut down. Consult with Nexus personnel before applying water on BESS equipment.

5.1.2 Emergency Communication

Establish and maintain clear lines of communication among facility personnel, emergency responders, and external agencies. Use established communication channels and protocols to share updates and coordinate response efforts effectively. Utilize the incident command system and create a unified command involving the West Columbia Fire & Rescue and Nexus.

For procedures concerning communicating with outside, non-responding entities, please see **Section 6.0**.

5.1.3 Access Control and Safety Perimeter

Implement access control measures to secure the area around the BESS facility. Establish a safety perimeter, considering the nature and scale of the incident, to protect personnel and facilitate emergency response operations. Evacuation of the area should include all non-emergency personnel within 200 feet (61 m) of the involved BESS. Evacuated persons should be moved upwind of the area where full accountability can be conducted. This evacuation zone is intended to include members of the public and persons occupying adjacent buildings within the initial safety perimeter. This safety perimeter may expand based on the fire department's risk assessment and atmospheric monitoring activities.

5.2 LITHIUM-ION (LI-ION) BESS SPECIFIC GUIDELINES

Li-Ion BESS fires and thermal runaway incidents require specialized response strategies due to their self-sustaining nature, large energy quantities, and the potential for hazardous gas release.

5.2.1 Response to Alarms and System Alerts

Upon activation of an alarm or receipt of a system alert, designated facility personnel should immediately assess the alarm's source and nature. This assessment includes checking system monitors and control panels for specific error messages or statuses that indicate the nature of the problem.

Simultaneously, initiate the ERP's communication protocol to inform the facility's emergency response team and, if necessary, external emergency services.

In cases where the BESS needs to be isolated or powered down, only qualified Nexus personnel should perform these actions, following established safety protocols to avoid exacerbating the situation.

5.2.2 Power Disconnection and Ventilation

Qualified Nexus personnel need to verify that all external power feeds to the affected BESS container have been disconnected. This step is crucial before any emergency access or firefighting efforts are initiated.

In the event internal atmospheric conditions of the BESS container cannot be determined, no access should be attempted. If the Energy Storage Management System / Battery Management System (ESMS or BMS) provides feedback that the internal conditions have returned to near normal (i.e. temperature and electrical system status), then gas sampling may be performed.

Once all the conditions are deemed to be at or near normal, then ventilation can be explored. The process of verifying a BESS container safe to ventilate may take a significant amount of time. If monitoring ports or remote monitoring are available, monitor the temperature and flammable gas concentration within the enclosure prior to ventilation. Opening a container door to ventilate will require an additional “wait and see” period at a safe distance. Ventilating the container should not be performed “head on” (e.g. do not stand directly in front of a door being opened; instead, stand to the side).

5.2.3 Emergency Access and Firefighting

Do not attempt to open the BESS container without first evaluating the atmospheric conditions within the container. Do not open the container without the use of SCBA gear, as toxic gasses may have built up in the BESS container. The time for safe access may vary depending on the volume of gasses built up inside the BESS container. Observing from a safe distance, once the conditions inside the BESS container appear to be clearing, access can be made into the container to suppress any residual fire conditions. If access is made, be aware that when significantly compromised, Li-Ion batteries will commonly re-ignite and restart the thermal runaway process. Damaged or compromised batteries should be observed under fire watch supervision for a minimum of 24 hours after an event to monitor for delayed propagation.

A standoff distance of 200 feet (61 m) is advised if the BESS container has not been ventilated. If the water injection system fails and the fire compromises the integrity of the enclosure (or if it has otherwise been ventilated), copious amounts of water should be used to defend adjacent battery containers.

5.2.4 Manual Firefighting Guidelines

In general, tactical operations should maintain a focus on life safety, including the lives of emergency responders. Cool exposures to prevent the involvement of additional equipment. With the approval of the on-site Nexus representative and if the involved BESS container has naturally ventilated, water may be applied manually via handlines to support defensive fire suppression efforts. Any firefighting water applied via handlines should be done with a minimum 30-degree fog pattern from a minimum of 200 feet (30.5 m) away from the BESS container.

Be aware of any standing water that may accumulate during firefighting efforts. Standing water could pose electrical hazards or obstruct emergency access routes.

5.2.5 Continuous Monitoring

Even after the immediate emergency has been addressed, remain cautious of the potential for reignition after the initial extinguishment. Continuous monitoring of the site is necessary to quickly identify and respond to any reignition scenarios.

DO NOT ATTEMPT TO OPEN the BESS container until the electrical failure event is verified by qualified Nexus Renewables personnel to be complete, and the above guidelines have been considered.

Table 5-1: BESS Emergency Scenarios and Recommended Actions.

Emergency Scenario	Recommended Actions	Responsible Personnel
Fire Incident	Notify the West Columbia Fire and Rescue. Evacuate the area as per the evacuation plan.	Primary and Secondary Emergency Contact Fluence
Thermal Runaway	Monitor system alerts and isolate affected units if possible. Avoid direct contact and use remote monitoring to assess conditions.	Primary and Secondary Emergency Contact Fluence
Power Failure	Switch to backup power sources if necessary. Secure sensitive equipment and data. Assess the impact on BESS operation.	Primary and Secondary Emergency Contact Fluence
Chemical Spill (if applicable)	Implement spill response protocol, including containment and cleanup. Use appropriate PPE and notify environmental agencies if required.	Primary and Secondary Emergency Contact

5.3 FIRE RESPONSE GUIDELINES

These guidelines are meant to assist first responders in safely responding to a fire or thermal runaway incident involving the BESS enclosure. These guidelines are not meant to supersede existing Standard Operating Procedures (SOPs) established by the first responders' organization.

5.3.1 Initial Response

When responding to a fire involving a BESS enclosure, **DO NOT** cut any perimeter gate locks, approach the BESS container or associated equipment, or force entry into it. **WAIT** outside the perimeter fence or at a safe distance of at least 100 feet (30.5 m) until Nexus Renewables personnel arrive on the scene to assist. If Nexus Renewables personnel are not present, **CALL** the emergency contact number listed in **Section 2.3** of this plan or request that Fire Communications call Nexus Renewables using one or both Nexus Emergency Contact Numbers (See **Section 2.3**).

Fires in BESS facilities are often a result of a process called thermal runaway. Thermal runaway is a process in which a battery creates heat but cannot dissipate the heat, resulting in a dramatic temperature increase. Signs of thermal runaway may include pressure increases within the cell, temperature increases, and off-gassing. As the process escalates additional signs may include gas ignition, exploding cells, projectiles, heat increase, and flame propagation. As the temperature continues to increase there is a potential for toxic and potentially explosive gas release.

A four-step process is recommended by the NFPA 855 standard for BESS electrical fires. The steps in sequence include 1. System isolation and shutdown, 2. Hazard confinement and exposure protection, 3. Fire suppression, and 4. Ventilation.

Shortly after arriving on the scene of a thermal runaway or an active fire in a unit, move all non-first responders indoors until air monitoring can confirm safe conditions. If there is a concern for the potential for the byproducts of combustion or off-gassing vapors to enter an occupied structure, then conduct an evacuation. NFPA 855 recommends evacuating buildings within 200 feet (61 m) of the BESS-involved unit.

NFPA 855 recommends the following first responder actions upon arrival at BESS incident.

1. Stage fire trucks upwind.
2. Use binoculars to evaluate the scene.
3. Attempt to isolate the enclosure that is damaged / on fire by confirming that the enclosure is no longer charging or discharging electrical energy.
4. Work with the Nexus representative to determine when it is safe to enter the area. Do not enter the area until authorized to do so by the Nexus representative. Never assume that the fire is out based on visual observation. The batteries themselves are the largest risk within the facilities. While fires can start in the inverters as well, the greatest risk for the site would be a battery fire that could lead to thermal runaway.
5. Contact the person or company responsible for the operation and maintenance of the system.
6. Continue temperature monitoring to ensure mitigation of overheating conditions; never enter a facility until the Nexus representative is on-site.
7. Isolate areas of all nonessential personnel and keep the public away.
8. Review the status of the building and ESS alarm systems with available data.
9. Review the status of any fire protection system activation.
10. Perform air monitoring of all connected spaces.
11. Never assume a fire is out—reignition is common.
12. Use respiratory protection due to chemicals being produced during the fire—SCBA should be used at all times while in and around the hazard during firefighting efforts, as well as during any overhaul and recovery required by fire department personnel.
13. Determine if tankers or drop tanks are needed to supply enough water to fight the fire.
14. Protect other buildings. Water curtains can be set up to help protect surrounding exposures but could place personnel within the blast radius of the hazard.

5.3.2 Unified Command

Once Nexus Renewables personnel arrive, make contact, create a continuous point of contact (POC) for the incident, and establish a unified command with Nexus Renewables POC. For your safety, while you are on the premises, qualified Nexus Renewables personnel **MUST** be present and **always REMAIN with the incident commander**.

5.3.3 Firefighters Safety Precautions

Firefighter **ACCOUNTABILITY** within the facility is the responsibility of the West Columbia Volunteer Fire Department and any of the mutual aid partners assigned to the incident. A system should be in place to track the location and status of all firefighters and personnel involved in the response to ensure their safety throughout the operation.

All personnel entering areas with smoke or potential toxic gas exposure must **USE SCBA**. The combustion gases given off may be toxic and/or corrosive. This is crucial to protect against the inhalation of toxic and corrosive combustion gases, which can result from battery materials.

5.3.4 Equipment Isolation

Due to the nature of utility-scale BESS, the system is not intended to be de-energized, but rather, shut down and isolated in a fire event to reduce the risk of fire, electric shock, and personal injury hazards.

5.3.5 Gas Sampling and Exposure Management

If available, utilize gas meters equipped with extended probes to perform gas sampling within and around the BESS container. This should include monitoring for flammable, toxic, and oxygen-deficient environments. When performing gas sampling, maintain as much distance as possible and never approach any of the BESS container doors head-on. To minimize risk in the event of a sudden gas release or explosion, **NEVER** position oneself directly in front of the enclosure doors. Based on gas sampling and wind direction, consideration should be given to shelter-in-place or evacuation orders for facility personnel, emergency responders, and the surrounding community.

5.3.6 Fire Extinguishing System Considerations

Neither the individual battery container units nor the facilities have fixed fire suppression. Each container is protected by an integrated deflagration venting panels, temperature sensor, multi-sensor smoke detector, carbon monoxide (CO) monitor, hydrogen monitor, warning strobe/alarm, and fast stop button. The BESS containers are monitored by the manufacturer, Fluence, 24/7. Upon receiving an alarm from a compromised BESS container, Fluence will work with Nexus and local emergency responders to coordinate a response.

Shielding of the batteries created by the structural enclosure of the ESS systems often means water may not be directly applied to the battery racks. In such cases, extinguishment of the incipient ESS container is often not possible. Since the system type leverages a gaseous suppression system with a water injection unit directly to the hazard, the system type attempts to remedy this issue. Regardless of this point, in many situations, if there are no immediate exposures and no immediate danger to the public, letting the BESS container burn while utilizing defensive tactics for surrounding ESS containers may be the best and safest approach.

Nexus Renewables personnel must determine when equipment is electrically **SAFE** to fight a fire, especially when the fire department will be involved in the direct application of water on or near electrical equipment. **CAUTION** - adjacent electrical equipment not involved in the fire may still be energized.

Handlines should only be used on energized or potentially energized equipment in extreme situations. Only with proper training and approval by Nexus Renewables should firefighters consider using water on electrical equipment. Equipment and application factors affecting the safe use of water on potentially energized electrical components:

- Proper nozzle and proper nozzle pressure

- Proper patterns used (at least 30 degrees - never a straight or solid stream)
- Proper distance from the component of at least 100 feet (30.5 m)

According to NFPA 855, Standard for the Installation of Stationary Energy Storage Systems, 2023 Edition: "Water spray has been deemed safe as an agent for use on high-voltage systems. The possibility of current leakage back to the nozzle, and ultimately the firefighter, is insignificant based on testing data published in the Fire Protection Research Foundation Report *Best Practices for Emergency Response to Incidents Involving Electric Vehicles Battery Hazards: A Report on Full-Scale Testing Results*."

Other factors that affect safety are:

- Impact of overspray on energized electrical components
- Water runoff or pooling may become energized.
- Impact of water runoff and pool on other components in the area
- Weather conditions: wind, rain, and humidity

Follow your fire department's SOPs and consult Nexus Renewables prior to using water on BESS equipment fires. Stranded electrical energy may remain in fire-damaged storage batteries and other energy storage equipment. The stored energy may maintain the potential for reignition long after initial extinguishment.

5.4 MEDICAL EMERGENCY

5.4.1 **Medical Emergency Response Procedures**

In the event of a serious medical emergency, employees must notify the local Emergency Medical Services (EMS) by dialing 911 and contacting their Nexus Management including the Incident Commander of the Emergency Management Committee (EMC). Nexus staff will handle the medical emergency per Nexus HSE Management System and site-specific procedures.

Medical emergencies in workplace settings can range from heart attacks, shock, heat stress, and dehydration to choking incidents and broken limbs. If someone is sick or hurt, follow these basic first-aid steps from the American Red Cross.

- Check the scene. Make sure it is safe to get closer.
- Check the injured person for life-threatening conditions (e.g., constant or sudden chest pain, trouble breathing, heavy bleeding, lack of consciousness, severe injuries from falls, or head wounds or burns).
- Call for help. Alert your coworkers to the need for help.
- Call 911 if the injured person exhibits any of the life-threatening conditions listed above or have someone else call while staying with the person.
- Care for the injured. Make your best effort to comfort the person and prevent further injury until emergency responders arrive.

5.4.2 Non-emergency Safety Incident

All non-emergency safety incidents should be reported to your immediate supervisor, even if the safety incident does not result in a serious injury. Follow-up activities will identify any need to make changes in training, equipment, engineering controls, administrative procedures, or personal protective equipment.

5.5 SECURITY INCIDENTS

5.5.1 Bomb Threat

In the event a threat is received, an employee should notify available Nexus Management. All threats should be treated seriously. In addition, employees should adhere to the direction of local law enforcement. Should evacuation of the affected building or area be necessary, all personnel involved should contact their immediate supervisor for details regarding returning to work. It is the responsibility of the employee who receives the threat to submit an EOP Bomb or Terrorist Threat Report Form within four (4) hours to the Nexus Incident Commander of the EMC, or the Emergency Operations Plan Administrator of Nexus.

There are several considerations to keep in mind when a bomb threat is received. Never ignore a bomb threat. Report it immediately to the police and to your Nexus leadership. Bomb threats can be received via social media. If you find a threat against the BESS, do not assume it has been seen. Report it immediately. Typically, a perpetrator announces the bomb threat by phone. If you receive the call, take it seriously and act quickly. Take the following actions recommended by the U.S. Department of Homeland Security.

- Remain calm.
- Do not hang up.
- If speaking to the caller on an office phone, use a personal phone to notify the police.
- Keep the perpetrator on the phone for as long as possible.
- Listen closely to details about the bomb and its location.
- Listen attentively for strange or unusual background noise from the caller's phone.
- Take detailed notes.
- Refer to the Bomb Threat Procedure and Checklist found in **Section 10.0** of this emergency plan.
- Once the bomb threat phone call ends, immediately inform the police and your Nexus leadership.

5.5.2 Sabotage or Vandalism

The destruction of property is illegal, and the authorities will want to catch the person or persons committing the crime if possible. Call 911 to report sabotage or vandalism if it is in progress or if the suspects are on-site. If the destruction has already occurred and there is no suspect on the premises do not use 911. Reach the police by using a non-emergency phone number found on the contact information page in **Section 2.3** of this emergency plan.

Take photos of the damage, if possible, without putting yourself at risk of being injured. Do not move evidence or touch surfaces that the suspects may have touched, so that the scene can be preserved for the investigators.

5.5.3 Active Shooter

An active shooter or active assailant kills or attempts to kill people in a confined and populated area. In most cases, active assailants use firearms and follow no pattern or method when selecting their targets. Active assailant situations are unpredictable and evolve quickly. Focus your immediate actions on maximizing your personal safety until the police department arrives on the scene and stops the threat. What you do matters. People around you are likely to follow the lead of anyone with a plan to survive. You must run, hide, and then fight, if necessary.

If an active assailant is close to your location, do the following:

Run – If You Can

- Identify and follow an escape route.
- Be as quiet as possible.
- Leave belongings behind.

Hide – If You Have To

- If you cannot flee, lock and/or barricade yourself in a secure room.
- Hide in an area outside of the assailant's view.
- Lock doors and windows.
- Block entry to your hiding place.
- Silence your cell phone.
- Remain quiet.
- Do not leave the hiding place until the police department instructs you to do so.

Fight – If You Must

- Fight only as a last resort when your life is in immediate danger and running or hiding is impossible.
- Act with aggression.
- Use items around you as weapons. Throw items at the assailant.
- Use nearby devices as weapons.
    - A fire extinguisher.
    - Sharp objects, such as knives, scissors, letter openers or bottle openers.
    - Chairs, laptop computers, or tools.
    - Attempt to incapacitate or temporarily stun the assailant so you can escape.
- As a last resort, launch a group effort to fight the assailant. Multiple people quickly acting in concert may overpower an assailant.

Call 911 When Safe to Do So

- Provide the following information to law enforcement or the 911 operator:
    - Last known location of the assailant(s).
    - Number of assailants.
    - Physical description of the assailant(s).
    - The number and type of weapons the assailant(s) had and used.
    - The approximate number of victims.
- When law enforcement arrives, do the following:
    - Remain calm and follow instructions.
    - Put down items in your hands, including bags and jackets.
    - Raise your hands and spread your fingers.
    - Keep your hands visible.
    - Do not make quick movements toward officers.
    - Do not make quick movements toward officers, such as holding on to them for safety.
    - Avoid pointing, screaming, or yelling.

5.6 EMERGENCY RESOURCES AND EQUIPMENT

This section outlines the systems, resources, and equipment in place to manage and respond to emergencies within the BESS facility effectively. It details the availability, functionality, and maintenance of various systems designed to enhance safety, detect hazards, suppress fires, and support emergency responders.

5.6.1 Fire Alarm and Detection System

Each BESS container is provided with an automatic fire detection system. The fire detection system consists of a multi-sensor smoke detector, temperature sensor, carbon monoxide detector, and hydrogen gas detector. Upon detection of smoke, carbon monoxide, or elevated temperatures, the unit and site alarms will be triggered. Upon triggered of a container alarm, the system's fast-stop automatically cuts power to the faulty unit. **Danger! The system fast-stop does not de-energize the BESS container(s). Personnel still face the risk of severe, potentially fatal, electric shock.** Fluence, the manufacturer of the Gridstack Pro 5000, monitors both facilities 24/7 for system alarms. Upon receiving an alarm from either Bell Creek or Brazos River locations, Fluence will work with Nexus and local emergency responders to initiate response activities.

5.6.2 Fire Suppression

Portable fire extinguishers will be provided and distributed at each facility as required. Nexus personnel are not required to use portable fire extinguishers, and, excluding defensive use to escape a fire, will only use a fire extinguisher if they have received the required annual training.

5.6.3 Personal Protective Equipment (PPE)

All fire department personnel entering the facility during a fire or other emergency should be wearing full protective firefighting turnout gear and utilizing positive pressure self-contained breathing apparatus. Firefighting crews should be in radio contact with the operations section chief, the incident commander, or their designee while within the fence line. Full crew accountability is recommended for all personnel entering the facility during an emergency.

Due to the facilities being unstaffed and remotely monitored, emergency PPE for Nexus personnel is not expected to be necessary. Nexus personnel are only to perform defensive emergency response actions in order to safely escape the facility. PPE required in response to triggering the Pandemic and Epidemic Annex will be acquired and distributed as appropriate.

5.6.4 Additional Resources

First aid kits will be provided at both facilities. If deemed necessary, supplies to address a cold weather event such as ice melting and shovels will be stored at each facility.

5.6.5 Emergency Communication Systems.

The site's energy storage modules are arranged in an open-air setting. Fire department and emergency medical service radios should experience no radio interference. The BESS facility is normally unmanned. A fire department standard operating procedure for firefighter evacuation is recommended. The firefighter evacuation signal is authorized by the incident commander or safety officer and is used to alert firefighters to evacuate the site due to imminent danger or hazardous conditions.

5.6.6 Emergency Staffing

Nexus will provide staffing required to address emergency scenarios. Emergency staff will be dispatched through coordination between Nexus and the BESS system manufacturer, Fluence. Fluence is contracted to provide long term support to both the Bell Creek and Brazos River facilities. During an emergency, the primary and secondary emergency contacts in this plan are responsible for arranging for Nexus personnel or contract personnel knowledgeable in the requirements of this plan to staff each facility.

6.0 Communications Plan

This section details the procedures for communicating, in advance of and during an emergency, with various entities as required as an ERCOT member. The communications policies within this section are intended to fulfil Nexus Renewables, Inc.'s responsibilities in keeping various public entities informed regarding a service disruption or a potential service disruption. This section is not intended to cover communications required to obtain emergency assistance from an entity such as a fire department. For emergency assistance, please refer to the appropriate section of the combined ERP/EOP or visit Section 2.3 for emergency contact information.

6.1 MEDIA

In order to maintain the integrity and consistency of company communications, Nexus personnel will not give statements to the media unless designated to do so. Specific Nexus personnel are authorized to provide public statements. Nexus will give statements to the media about the status of the Bell Creek and Brazos River facilities as deemed necessary. All media inquiries and requests related to this plan must be directed to either the primary or secondary emergency contact. The emergency contact will then work with the Nexus communications team to produce a response.

Nexus personnel and contractors who are approached by a member of the media are to refrain from providing any comments or information. Instead, kindly inform the inquirer that all media requests are to be handled by our designated communications team.

6.2 PUBLIC UTILITY COMMISSION OF TEXAS

Nexus Renewables Inc. is committed to fulfilling its obligations in communicating with the Public Utility Commission of Texas during emergencies. Authorized Nexus personnel will reach out to the commission via phone or email in the event that the EOP is activated. The commission may reach out to either the primary or secondary emergency contact specified in this plan. Emergency contact personnel are responsible for developing statements with the internal communications team. Nexus personnel who are not authorized to interact directly with the commission are instructed to forward all communication requests to the designated primary or secondary emergency contact listed in this plan.

6.3 THE OFFICE OF PUBLIC UTILITY COUNSEL

Nexus Renewables Inc. is committed to fulfilling its obligations in communicating with the Office of Public Utility Counsel (OPUC) during emergencies. Authorized Nexus personnel will reach out to PUCT via phone or email in the event that the EOP is activated. OPUC may reach out to either the primary or secondary emergency contact specified in this plan. Emergency contact personnel are responsible for developing statements with the internal communications team. Nexus personnel who are not authorized to interact directly with OPUC are instructed to forward all communication requests to the designated primary or secondary emergency contact listed in this plan.

6.4 FUEL SUPPLIERS

The Bell Creek and Brazos River BESS facilities do not use fuel for power generation. This requirement is not applicable to this emergency operations plan.

6.5 LOCAL AND STATE GOVERNMENTAL ENTITIES AND OFFICIALS

Nexus Renewables Inc. will communicate with other local and state governmental entities and officials as necessary to prepare for and respond to emergency situations. Local and state governmental entities and officials may reach out to either the primary or secondary emergency contact for questions or coordination efforts regarding this plan. Nexus personnel who are not authorized to interact directly with local and state governmental entities and officials are instructed to forward all communication requests to the designated primary or secondary emergency contact listed in this plan.

6.6 STATE OPERATIONS CENTER

Nexus Renewables Inc. will communicate with the State Operations Center of Texas to prepare for and respond to emergency situations. The State Operations Center may reach out to either the primary or secondary emergency contact for questions or to coordinate efforts regarding this plan. To facilitate emergency coordination and meet EOP requirements, both the primary and secondary emergency contacts are required to be trained annually in the latest IS-100, IS-200, IS-700, IS-800 National Incident Management System training. Nexus personnel who are not authorized to interact directly with the State Operations Center are instructed to forward all communication requests to the designated primary or secondary emergency contacts listed in this plan.

6.7 RELIABILITY COORDINATOR

Nexus Renewables Inc. is committed to fulfilling its obligations in communicating with the Electric Reliability Council of Texas (ERCOT) during emergencies. Authorized Nexus personnel will reach out to ERCOT via phone or email in the event that the EOP is activated. ERCOT may reach out to either the primary or secondary emergency contact specified in this plan. Emergency contact personnel are responsible for developing statements with the internal communications team. Nexus personnel who are not authorized to interact directly with ERCOT are instructed to forward all communication requests to the designated primary or secondary emergency contact listed in this plan.

7.0 Drills

Both the Bell Creek and Brazos River facilities must conduct or participate in at least one drill each calendar year to test this EOP. Following an annual drill the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required to conduct or participate in a drill in the calendar year in which the EOP was activated.

The notice to the Commission must include the date, time, and location of the drill and should be emailed to **drillnotice@puc.texas.gov**. Additionally, you may also include information about which portion of the EOP is being drilled. If the Hurricane Annex is being drilled, the notification must include a statement expressing that the Hurricane Annex is being drilled.

Due to the fact that both the Bell Creek and Brazos River facilities are located in a TDEM hurricane evacuation zone, the hurricane annex must be drilled at both locations at least once annually. The drill notice email associated with this drill must specify that the hurricane annex is being drilled. This also satisfies the annual drill requirement and another portion of the EOP is not required to be drilled, however, the entity may choose to do so.

After-action reporting is required, but there is not a requirement to file the after-action report with the Public Utility Commission of Texas. However, after-action reports should be kept and made available to the commission upon request. If the commission requests after event reporting from Nexus, the method of submission will be specified at the time of request. After action reports should contain at least the following items:

- Date/Time of the drill
- Roster of participants
- Portion of the EOP that was drilled
- Lesson learned
- Evidence that personnel were trained to assist in facility evacuation (optional to meet OSHA training requirement)

8.0 Summary of Annual and Filing Requirements

The intention of this section is to collect all annual and filing requirements necessary for the maintenance of this plan in a single location.

8.1 INITIAL FILING

8.1.1 Public Utility Commission of Texas (PUCT)

Nexus Renewables, Inc. must file the following with PUCT:

1. An executive summary of the emergency operations plan consisting of:
    a. The Executive Summary Section of this plan
    b. A record of distribution in table format containing four columns (personnel title, personnel name, date of access to the EOP, date of training on the EOP)
    c. A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
    d. An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
        i. relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
        ii. the EOP has been reviewed and approved by the appropriate executives;
        iii. drills have been conducted to the extent required by subsection (f) of this section;
        iv. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
        v. the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
        vi. the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
2. A copy of the complete combined ERP/EOP document. Confidential information can be redacted from this filing.

8.1.2 Electric Reliability Council of Texas (ERCOT)

An unredacted copy of the combined ERP/EOP document in its entirety must be provided to ERCOT.

8.2 ANNUAL PLAN UPDATE

An annual review of the combined ERP/EOP must be performed to determine if any changes to the plan are required. Filing requirements differ depending on the presence and/or nature of the changes to the plan, but both situations require the annual update status filing to be completed by March 15th each year.

8.2.1 Material changes to the plan required

If Nexus changes the ERP/EOP document in such a way as to materially affect how emergencies would be handled at the Bell Creek or Brazos River, Nexus must file an executive summary containing the following information with PUCT:

1. An Executive Summary containing:
    a. The Executive Summary Section of this plan
    b. describes the changes to the contents or policies contained in the EOP
    c. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule
    d. includes the record of distribution of the plan/training (See Subsection 8.1.1)
    e. contains the required affidavit (See Subsection 8.1.1)
2. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
3. submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.

8.2.2 No material changes to the plan required

An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with PUCT:

1. a pleading that documents any changes to the list of emergency contacts
2. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency
3. the required affidavit (See Subsection 8.1.1)

8.3 UPDATE OF PLAN AND EMERGENCY CONTACTS

Nexus personnel responsible for maintaining this plan are required to review the plan and emergency contacts on an annual basis to determine if any changes are necessary. Necessary changes to the plan could result from lessons learned during an emergency or drill, a change in emergency contacts, or a change in equipment at either facility. If the plan is reviewed and it is determined that no changes are required, an entry into the plan's revision log will note the review and that no changes were required.

8.4 TRAINING AND RECORD OF DISTRIBUTION

Nexus will train personnel and contract staff in the contents of this combined ERP/EOP document on an annual basis. Nexus will then update, on an annual basis, the Record of Distribution (See Subsection 8.1.1) to reflect trained personnel and most recent training dates.

8.5 DRILLS

Each facility must perform at least one drill that requires the activation of a portion of this EOP. Since both Bell Creek and Brazos River are located within a hurricane evacuation zone, at least one of the drills must include activation of the Hurricane Annex. Drills, notifications and documentation are to be performed as outlined in Section 7.0. It is important to note that the PUCT must be given at least 30 days' notice before at least one drill exercise per year.

If a drill exercises the Hurricane Annex, PUCT must be made aware of the intention to perform this type of drill. Additionally, activation of the Hurricane Annex requires coordination with the Texas Division of Emergency Management (TDEM) District Coordinator.

After-action reports detailing participation, information about the drill, and lessons learned will be produced and documented. These after-action reports will be made available, upon request, to PUCT and ERCOT.

8.6 OSHA AND GENERAL SAFETY REQUIREMENTS

As part of an annual drill exercising the EOP or as part of coordination with local emergency responders, Nexus will coordinate an emergency evacuation drill at both Bell Creek and Brazos River. During this drill, Nexus will train personnel on how to assist in an orderly evacuation of the facility, how to assemble at the emergency evacuation assembly point, how to determine that all personnel have been accounted for, and how to summon emergency responders. Nexus will document this training and keep records available for review at the request of the AHJ.

8.7 COORDINATION WITH LOCAL EMERGENCY RESPONSE SERVICES

In accordance with the requirements of this plan, Nexus is to annually reach out to local emergency response entities to offer to coordinate joint participation in a drill or to conduct a facility walkthrough at the Bell Creek and Brazos River facilities.

9.0 Safety Data Sheets (SDS)

The following information is extracted from individual Safety Data Sheets for the hazardous materials found within the facility. The SDS documents are available from Nexus Renewables upon request. A complete set of SDS documents are accessible at the site. They are essential for understanding the hazards associated with the substances used and stored at the BESS facility. These documents provide vital information on handling, storage, and emergency measures for hazardous materials. Provided below is a summary of the critical information from the SDS. Always consult the SDS for more detailed information.

1. **Contemporary Amperex Technology Co., Limited Lithium-Ion Battery Pack:**
    - **Product and Company Identification**
        - Rechargeable Lithium-Ion Battery Pack
        - No.1 Shidai Street, High-tech Industrial Development Zone, Zhaoqing City, Guangdong Province, P.R.C., 526238

- Phone Number: +86-0593-2583668
- Under normal conditions of use, there is no physical danger of ignition, explosion or chemical danger of hazardous materials leakage.
- The chemicals and metals in this product are contained in a hermetically sealed container designed to withstand temperatures and pressures encountered during normal use.
- The battery may only represent a hazard if the integrity of the battery is compromised or if the battery is mechanically, thermally or electrically abused.

- **First Aid Measures**
  - Inhalation:
    - Leave the area immediately and seek medical attention.
  - Eye Contact:
    - Flush with plenty of water for at least 15 minutes (eyelids held open).
    - Seek medical attention immediately.
  - Skin Contact:
    - Remove contaminated clothing. Wash the area with soap and plenty of water immediately and for at least 15 minutes.
    - Seek medical attention immediately.
- **Fire Fighting Measures**
  - Extinguishing media:
    - Plenty of water, carbon dioxide gas, chemical powder, foam fire extinguishing.
  - Firefighting procedures:
    - Use a positive pressure self-contained breathing apparatus if batteries are involved in fire.
    - Full protective clothing is necessary.
    - During water application, caution is advised as burning pieces of flammable particles may be ejected from the fire.
  - Hazardous combustion products:
    - Fire, excessive heat and/or over voltage conditions may produce hazardous decomposition products (i.e., electrolyte fumes and hazardous organic vapors).
    - Vapors may be heavier than air and may travel the ground or be moved by ventilation to an ignition source.
- **Accidental Release Measures**
  - Rapidly evacuate people from the contaminated area to a safe area and isolate and strictly limit access. Cut off the source of ignition and the source of leakage as far as possible.

- It is recommended that emergency personnel wear self-contained positive pressure respirators, protective glasses, firefighting suits and do not come into direct contact with the spill.
- Small spill: Absorb spill residue with sand, vermiculite or other inert materials, collect and transport to an open area for burial, evaporation, or burning.
- Large spill: Construct an embankment or dig a pit to receive it. Cover with foam to reduce vapour hazard. Transfer to a tanker or special collector with an explosion-proof pump for recycling or transport to a waste disposal site.

2. Airgas Difluoromethane (R32) refrigerant:

- **Product and Company Identification**
  - Difluoromethane (R32)
  - 259 North Radnor-Chester Road, Suite 100 Radnor, PA 19087-5283
  - Phone Number: 1-866-734-3438
  - GHS Classification:
    - FLAMMABLE GASES - Category 1
    - GASES UNDER PRESSURE - Liquefied gas
- **First Aid Measures**
  - Inhalation:
    - Remove victims to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
  - Eye Contact:
    - Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention if irritation occurs.
  - Skin Contact:
    - Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. To avoid the risk of static discharges and gas ignition, soak contaminated clothing thoroughly with water before removing it. Get medical attention if symptoms occur. In case of contact with liquid, warm frozen tissues slowly with lukewarm water and get medical attention. Do not rub affected area. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- **Fire Fighting Measures**
  - Use an extinguishing agent suitable for the surrounding fire.

- Contains gas under pressure. Extremely flammable gas. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion.
- Decomposition products may include the following materials: carbon dioxide, carbon monoxide, and halogenated compounds.
- Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training. Contact the supplier immediately for specialist advice. Move containers from the fire area if this can be done without risk. Use water spray to keep fire-exposed containers cool. If involved in fire, shut off flow immediately if it can be done without risk. If this is impossible, withdraw from the area and allow fire to burn. Fight fire from protected location or maximum possible distance. Eliminate all ignition sources if safe to do so.
- Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode. For incidents involving large quantities, thermally insulated undergarments and thick textile or leather gloves should be worn.

- **Accidental Release Measures**
  - Accidental releases pose a serious fire or explosion hazard. No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Shut off all ignition sources. No flares, smoking or flames in the hazard area. Avoid breathing gas. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
  - Small spill: Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment.
  - Large spill: Immediately contact emergency personnel. Stop leak if without risk. Use spark-proof tools and explosion-proof equipment.

3. **Honeywell Solstice® 513A refrigerant:**
   - **Product and Company Identification**
     - Solstice® 513A
     - 115 Tabor Road, Morris Plains, NJ 07950-2546
     - Phone Number: 1-800-498-5701
     - GHS Classification:
       - Simple Asphyxiant
       - GASES UNDER PRESSURE - Liquefied gas
   - **First Aid Measures**

- Inhalation:
  - Move to fresh air. If breathing is irregular or stopped, administer artificial respiration. Use oxygen as required, provided a qualified operator is present. Call a physician. Do not give drugs from adrenaline-ephedrine group
- Eye Contact:
  - Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. In case of frostbite water should be lukewarm, not hot. If symptoms persist, call a physician.
- Skin Contact:
  - After contact with skin, wash immediately with plenty of water. If there is evidence of frostbite, bathe (do not rub) with lukewarm (not hot) water. If water is not available, cover with a clean, soft cloth or similar covering. If symptoms persist, call a physician.

- **Fire Fighting Measures**
  - The product is not flammable. Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide. Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
  - In the event of fire and/or explosion do not breathe fumes. Wear self-contained breathing apparatus and a protective suit. No unprotected exposed skin areas.
  - In case of fire, hazardous decomposition products may be produced such as hydrogen halides, hydrogen fluoride, carbon monoxide, carbon dioxide (CO2), and carbonyl halides.

- **Accidental Release Measures**
  - Immediately evacuate personnel to safe areas. Keep people away from and upwind of spill/leak. Wear personal protective equipment. Unprotected people must be kept away.
  - Remove all sources of ignition.
  - Avoid skin contact with leaking liquid (danger of frostbite).
  - Ventilate the area.
  - After release, it disperses into the air. Vapors are heavier than air and can cause suffocation by reducing oxygen available for breathing. Avoid accumulation of vapor in low areas. Unprotected personnel should not return until air has been tested and determined safe. Ensure that the oxygen content is >= 19.5%.

4. **Prestone ® Command Heavy Duty CorGuard 50/50 Antifreeze/Coolant:**

- **Product and Company Identification**
  - Command Heavy Duty CorGuard 50/50 Antifreeze/Coolant
  - Prestone Products Corporation 69 Eagle Rd. Danbury, CT 06810
  - Phone Number: 1-888-269-0750
  - GHS Classification:

- Acute Toxicity Category 4
- Specific Target Organ Toxicity – Repeated Exposure Category 2

- **First Aid Measures**
  - Inhalation:
    - Remove the victim to fresh air. If breathing has stopped administer artificial respiration. If breathing is difficult, have medical personnel administer oxygen. Get medical attention.
  - Eye Contact:
    - Immediately flush eyes with large amounts of water for 15 minutes. Get medical attention if irritation persists.
  - Skin Contact:
    - Remove contaminated clothing. Immediately wash contacted area thoroughly with soap and water. If irritation persists, get medical attention.
- **Fire Fighting Measures**
  - For large fires, use alcohol type or all-purpose foam. For small fires, use water spray, carbon dioxide or dry chemical.
  - A solid stream of water or foam directed into hot, burning liquid can cause frothing. Burning may produce carbon monoxide and carbon dioxide.
  - Do not spray pool fires directly. Firefighters should wear positive pressure self-contained breathing apparatus and full protective clothing for fires in areas where chemicals are used or stored.

- **Accidental Release Measures**
  - Wear appropriate protective clothing and equipment.
  - Collect with absorbent material and place in appropriate, labeled container for disposal or, if permitted flush spill area with water.

10.0 Bomb Threat Procedure Checklist

BOMB THREAT PROCEDURES

This quick reference checklist is designed to help employees and decision makers of commercial facilities, schools, etc. respond to a bomb threat in an orderly and controlled manner with the first responders and other stakeholders.

Most bomb threats are received by phone. Bomb threats are serious until proven otherwise. Act quickly, but remain calm and obtain information with the checklist on the reverse of this card.

If a bomb threat is received by phone:

1. Remain calm. Keep the caller on the line for as long as possible. DO NOT HANG UP, even if the caller does.
2. Listen carefully. Be polite and show interest.
3. Try to keep the caller talking to learn more information.
4. If possible, write a note to a colleague to call the authorities or, as soon as the caller hangs up, immediately notify them yourself.
5. If your phone has a display, copy the number and/or letters on the window display.
6. Complete the Bomb Threat Checklist immediately. Write down as much detail as you can remember. Try to get exact words.
7. Immediately upon termination of call, DO NOT HANG UP, but from a different phone, contact authorities immediately with information and await instructions.

If a bomb threat is received by handwritten note:

- Call _____
- Handle note as minimally as possible.

If a bomb threat is received by e-mail:

- Call _____
- Do not delete the message.

Signs of a suspicious package:

- No return address
- Excessive postage
- Stains
- Strange odor
- Strange sounds
- Unexpected delivery
- Poorly handwritten
- Misspelled words
- Incorrect titles
- Foreign postage
- Restrictive notes

Refer to your local bomb threat emergency response plan for evacuation criteria

DO NOT:

- Use two-way radios or cellular phone. Radio signals have the potential to detonate a bomb.
- Touch or move a suspicious package.

WHO TO CONTACT (Select One)

- **911**
- **Follow your local guidelines**

For more information about this form contact the Office for Bombing Prevention at: OBP@cisa.dhs.gov

V2

BOMB THREAT CHECKLIST

DATE: TIME:

TIME CALLER HUNG UP: PHONE NUMBER WHERE CALL RECEIVED:

Ask Caller:

- Where is the bomb located? (building, floor, room, etc.)
- When will it go off?
- What does it look like?
- What kind of bomb is it?
- What will make it explode?
- Did you place the bomb? Yes No
- Why?
- What is your name?

Exact Words of Threat:

Information About Caller:

- Where is the caller located? (background/level of noise)
- Estimated age:
- Is voice familiar? If so, who does it sound like?
- Other points:

Caller's Voice

- ☐ **Female**
- ☐ **Male**
- ☐ Accent
- ☐ Angry
- ☐ Calm
- ☐ Clearing throat
- ☐ Coughing
- ☐ Cracking Voice
- ☐ Crying
- ☐ Deep
- ☐ Deep breathing
- ☐ Disguised
- ☐ Distinct
- ☐ Excited
- ☐ Laughter
- ☐ Lisp
- ☐ Loud
- ☐ Nasal
- ☐ Normal
- ☐ Ragged
- ☐ Rapid
- ☐ Raspy
- ☐ Slow
- ☐ Slurred
- ☐ Soft
- ☐ Stutter

Background Sounds

- ☐ Animal noises
- ☐ House noises
- ☐ Kitchen noises
- ☐ Street noises
- ☐ Booth
- ☐ PA system
- ☐ Conversation
- ☐ Music
- ☐ Motor
- ☐ Clear
- ☐ Static
- ☐ Office machinery
- ☐ Factory machinery
- ☐ Local
- ☐ Long distance

Other Information:

_____

_____

_____

_____

Threat Language

- ☐ Incoherent
- ☐ Message read
- ☐ Taped message
- ☐ Irrational
- ☐ Profane
- ☐ Well-spoken

11.0 Revision History

This historical record enhances the transparency and continuous improvement of the emergency response strategy.

Revision	Date	Description
04		
02		
01		
00	XX/XX/2025	Initial Draft Issue

	Revision 00	Date XX/XX/XXXX
Writer		
Reviewer(s)		
Approver(s)		
Description	Initial Issue	

	Revision [XX]	Date XX/XX/XXXX
Writer		
Reviewer(s)		
Approver(s)		
Description		

Pandemic and Epidemic Annex

Special Considerations

+ A pandemic can start with only a few cases but rapidly spread around the globe.
+ Nexus Renewables will typically not know of a potential pandemic or a large-scale disease outbreak until after the disease is present in the United States.
+ Prior to a vaccine being available, Nexus Renewables may follow the advice and direction of the U.S. Centers for Disease Control and Prevention (CDC) or the Texas Department of State Health Services (DSHS), and may enforce social distancing and quarantine measures.
+ The Texas Department of State Health Services (DSHS) may enforce mask mandates, school closures and other social distancing measures during a pandemic or large-scale disease outbreak in the United States.

Response

The Nexus Renewables Incident Commander monitors guidance from the DSHS regarding novel disease outbreaks. If an entity such as the CDC announces a pandemic, the Incident Commander coordinates the response with the Nexus Emergency Response Team.

Additionally, the Incident Commander reviews the rules, guidelines and recommendations of the CDC and DSHS before developing a specific pandemic response plan for the battery energy storage system sites.

The Incident Commander may implement the following actions during a declared pandemic or large-scale disease outbreak:

+ Customize a pandemic safety plan and disseminate it to employees and contractors.
    - Train all staff on the updated pandemic plan.
    - Develop specific social distancing guidelines for staff, contractors and guests.
+ Require sick employees and contractors to work from home and instruct them to contact their doctor immediately.
+ Appoint an Emergency Response Team member to serve as a liaison to interact with the DSHS.
+ Follow the DSHS requirements and any recommendations regarding quarantines for exposed individuals and their family members.
+ Follow the social distancing and mask requirements and recommendations.
+ Follow the DSHS vaccination requirements and recommendations.
+ Identify, obtain, and distribute appropriate personal protective equipment to personnel.
+ Ensure that training on the selection, donning, wearing, doffing, and disposal of personal protective equipment is completed.

Until an effective vaccine becomes widely available during a pandemic, employees should take the following actions to prevent catching the disease and spreading it to others. Although the precautions and measures described below apply specifically to the COVID-19 pandemic, many of the basic tenets – like self-isolation, following CDC and government guidelines, and monitoring for symptoms – apply to other epidemic or pandemic situations.

+ Follow the DSHS recommendations.
+ Follow government restrictions, including the DSHS emergency orders, regarding staying at home, social distancing and personal protective equipment (PPE).
+ Monitor local media to stay abreast of government-issued alerts and disease spread in the County.
+ Wear a mask in public places.
+ When in public, practice social distancing and, whenever possible, stay at least six feet (1.5 m) away from other people.
+ Wash your hands with soap and water for at least 20 seconds throughout the day, especially after returning home from public places.
+ Avoid touching your eyes, nose and mouth. When coughing or sneezing, use your elbow or a tissue. Dispose of the tissue and wash your hands.
+ Clean and disinfect areas frequently touched at home (e.g., doorknobs, kitchen or bathrooms).
+ Monitor employees for symptoms such as the following:
    - Fever is over 100.4 degrees Fahrenheit.
    - Cough.
    - Shortness of breath.
    - Fatigue.
    - Chills.
    - Muscle pain or aches.
    - Headache.
    - Sore throat.
    - Loss of taste or smell.
    - Oximeter reading indicates low blood-oxygen level.
+ If someone has any of the following symptoms, seek immediate medical attention:
    - Trouble breathing.
    - Pain or pressure in chest.
    - Mental confusion.
    - Bluish lips or face.
+ If an employee is sick and can quarantine at home, they should contact their supervisor to discuss updated quarantine protocols. Quarantine protocols can include following measures:
    - Isolate in a separate room away from family members.
    - Develop a plan with family members to bring food, medicine and disinfectant wipes without interacting face to face (e.g., place food off outside the isolation room door).
    - Confirm with a doctor how long to remain in isolation.

Weather Emergency Annex

There are six types of weather emergencies that require special preparations. They include tornadoes, hurricanes, extreme wintry weather, extreme hot weather, drought, and flooding. Each of these weather emergencies may damage the energy storage projects at Bell Creek and Brazos River. The weather threats are addressed in the Brazoria County Hazard Mitigation Plan. Preparation for weather emergencies is crucial because such a disaster could strike with little or no warning. Preparation enables Nexus Renewables to organize a rapid and safer response to the threat that minimizes the potential for injuries and facilitates a faster recovery of the battery energy storage system. The consequences of a hurricane and the emergency response to the threat of a tropical storm or hurricane are addressed in a separate hurricane annex.

To identify the potential for a severe weather event it is best to monitor the local weather forecasts and the National Weather Service. Using an app on your smartphone, keeping a NOAA weather radio close by, or by following local news stations, you can be ready for weather emergencies.

Tornadoes
Windstorms are a common occurrence in Brazoria County. Tornados are characterized by a violently rotating column of air touching the ground and are usually attached to a thunderstorm. Wind speeds from the rotating column can range from 40 mph to 300 mph. The speed of movement for a tornado can be from 10 mph to 20 mph. Damage occurs due to the strength of the wind, flying debris, falling trees, strong hail, and damaging lightning. The Brazoria County Hazard Mitigation Plan rates tornadoes as a high risk.

When conditions are right for the development of tornadoes, the national weather service will issue a tornado watch. Tornado watches may cover large areas and will list a range of hours where tornado formation could occur.

When a tornado is recognized either by radar or by a trained observer, a tornado warning is issued to let you know that a tornado is imminent. When a tornado warning is issued, you should take shelter immediately. Tornado sirens will be activated to alert those that are outdoors to use their phones, computers, or television for more information.

The National Weather Service may also issue a tornado emergency message. This is the highest alert level for tornados. It is issued when a tornado has touched down in the watch area. The risk to life and property is severe.

Extreme Cold Weather
Freezing weather can bring challenges for equipment and personnel. A winter storm may bring winds that create dangerous wind chill factors. Storms may also bring precipitation in the form of snow, sleet, and freezing rain. The Brazoria County Hazard Mitigation Plan rates winter weather events as a moderate risk. Injuries and accidents can occur in vehicles moving from location to location or while personnel are on foot. Carefully prepare yourself for low temperatures, harmful wind chill, hazardous road conditions and slippery walkways by following the cold weather checklist below.

- Before a forecasted cold weather event, prepare the facility to withstand cold temperatures and the potential for snow or ice by taking appropriate actions such as:
    - Check that all enclosures are closed and appropriately sealed.
    - Ensure that all heating appliances are adequately functioning.
    - Verify that all required winter weather emergency supplies are stocked.

  - If snow or ice are expected, ensure that walking paths are salted in advance to prevent ice formation.
- If work is required to be performed at the facility during an extremely cold weather event, carefully plan with consideration for the following items:
  - Determine if road conditions are safe enough to travel to the facility.
  - Maintain communication via pre-established communication plan.
  - Dress in clothing appropriate for the weather such as a heavy coat, insulating gloves, etc.
  - Stay dry in the cold because moisture or dampness, e.g., from sweating, can increase the rate of heat loss from the body.
  - Keep extra clothing handy in case you get wet and need to change.
  - Take frequent breaks in a warm area.
  - Drink warm, non-caffeinated beverages.
  - If you feel exhausted or that you cannot get warm, stop work, get to a warm area, and communicate your status to other personnel or a manager.
- After a cold weather event, inspect equipment and enclosures for signs of damage. Identifying damage before it results in an adverse event can reduce unplanned downtime.

Extreme Hot Weather

The Nexus Renewables BESS equipment is in outdoor cabinets. Elevated temperatures, where the temperature is 10 degrees or more above the average temperature for the region, are common for the West Columbia area. The Brazoria County Hazard Mitigation Plan rates heat events as a moderate risk. Unprepared personnel may experience health effects including heat rash, heat exhaustion, and heat stroke. If work is to be performed in extreme hot weather, carefully prepare yourself for elevated temperatures and high humidity conditions by following the hot weather checklist below:

- Before beginning work:
  - Verify that all personnel have been trained to recognize the symptoms of heat stress.
  - If possible, plan work for the coolest times of the day.
  - Verify that a source of air conditioning or shade and that an adequate supply of cool water is available.
  - Dress in lightweight, light-colored, and loose-fitting clothing. Wearing a hat can provide additional shielding from the sun.
  - Wear sunscreen to prevent burns.
  - Drink plenty of water before starting work activities.
- During work:
  - Constantly monitor for signs of heat stress such as dizziness, headaches, nausea, etc. If any signs or symptoms are detected, stop work immediately, get to a cool place, and alert other personnel.
  - Take frequent breaks in the shade or an air-conditioned area.
  - Use cold towels to stay cool.
  - Drink water every 15-20 minutes, even if you are not thirsty.
  - Rotate tasks with high physical exertion amongst employees.
  - Permit workers to stop and rest if they feel uncomfortable.

Drought

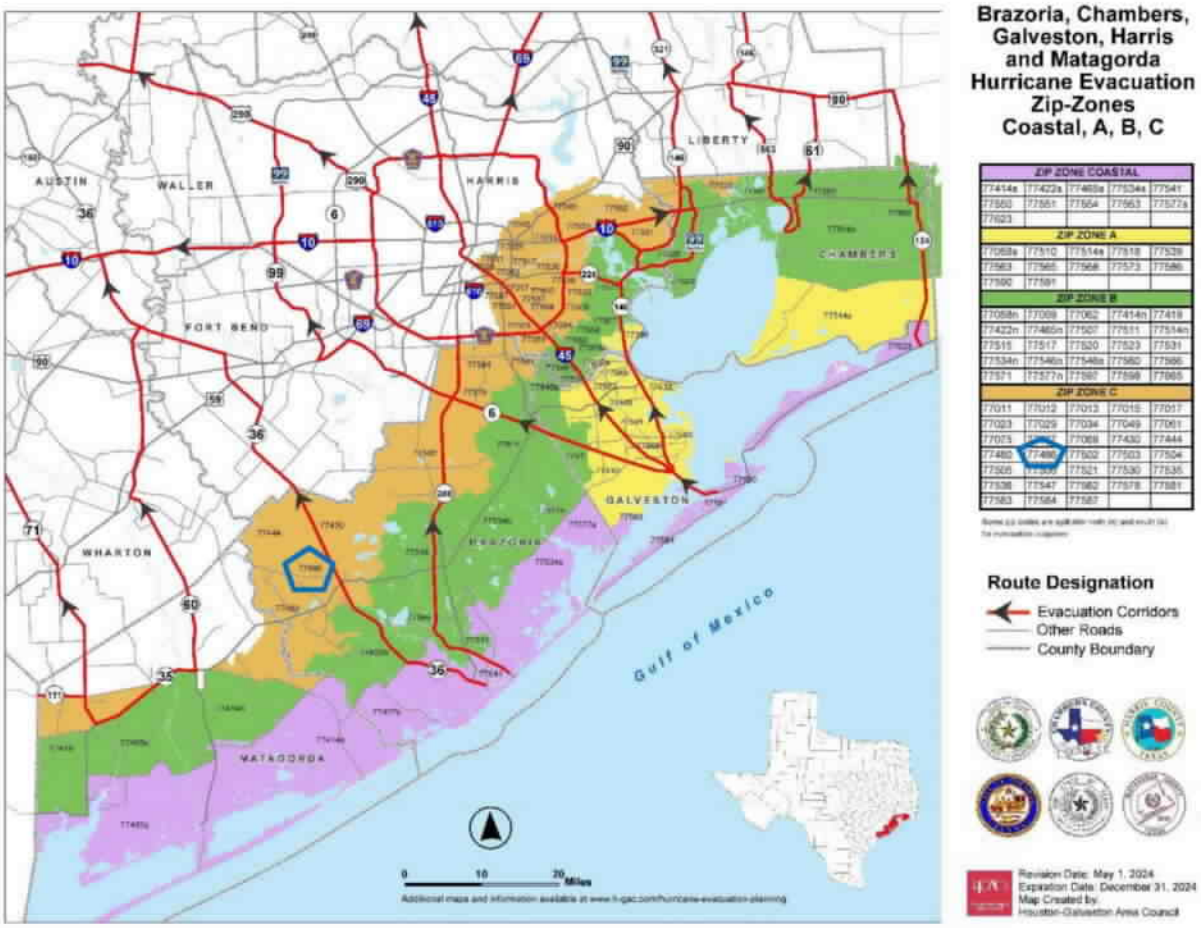
Elevated temperatures over an extended period, high winds, and low humidity can increase the region's susceptibility to drought. A drought is a prolonged dry period in the natural climate cycle. The Brazoria County Hazard Mitigation Plan rates drought as a moderate risk. The drought may increase the likelihood of wildfires. Identification of drought can be accomplished by following local news or by visiting **https://www.drought.gov/states/texas**. During drought conditions, assess if vegetation around the facility may need to be removed to reduce the risk of damage to the facility due to wildfire.

Flooding

Flooding may be triggered by several different events. General flooding may occur due to a long-term period of rain or repetitive rain events. General flooding will be characterized by the overflow of rivers, streams, and drainage ditches. Flash flooding is a short-term event that is quickly triggered and lasts less than 6 hours. Flash flooding may happen due to intense rain or the failure of a water control structure such as a dam. Flash floods may inundate bridges and roads. Flash floods may damage homes, roads, and even infrastructure. The Brazoria County Hazard Mitigation Plan rates flooding as a high risk.

Hurricane Annex

The Bell Creek and Brazos River BESS sites are both in hurricane evacuation zones as defined by the Texas Division of Emergency Management (TDEM). They are near zip code 77486. The facilities are in Brazoria County and included in TDEM Region 4. The Brazoria County Hazard Mitigation Plan identifies hurricanes and tropical storms as a high risk. The approach of a storm could bring flooding rain and high winds. The typical hurricane season begins June 1st and concludes November 30th each year.



Hurricane Evacuation Zones by Zip Code

Evacuation zones loosely correspond to the following hurricane categories. However, surge depends on other factors like storm size and speed. It is best to heed recommendations and any evacuation orders made by local officials.

Purple - Cat 1; Yellow - Cat 1 or 2; Green - Cat 3; Orange - Cat 4,5.

Employee Hurricane Responsibilities

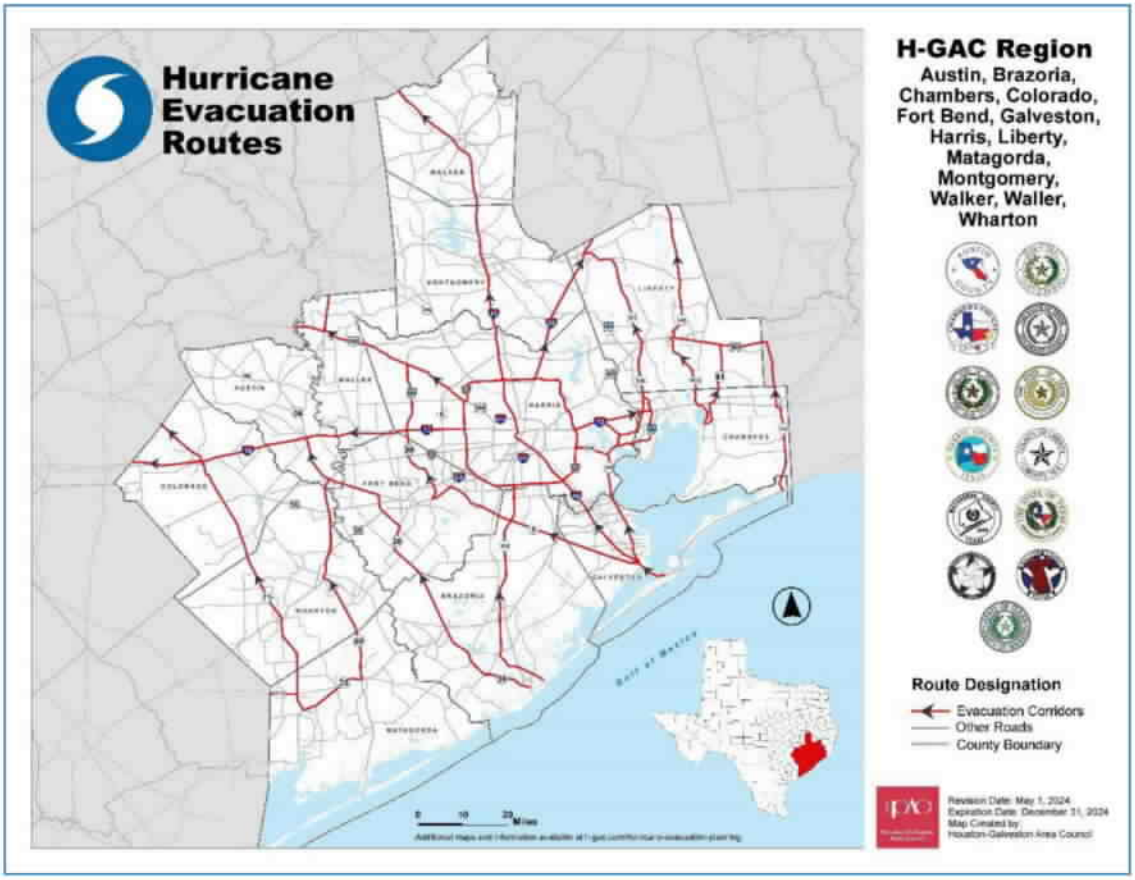
Pay attention to emergency alerts. Heed all local evacuation orders.

- If local officials tell you to evacuate, do so immediately.
- Determine how best to protect yourself from high winds and flooding.

- Take refuge in a designated storm shelter such as a Red Cross shelter.
- Go to the highest level of the building if you are trapped by flooding. Do not climb into a closed attic. You may become trapped by rising flood water.
- Do not walk, swim or drive through flood waters.
    - Remember: Turn Around. Don't Drown!
    - Just six inches of fast-moving water can knock you down, and **one foot of** moving water can sweep your vehicle away.
- Create a communication plan with your family.
- Review evacuation routes from the West Columbia area
- Find a local shelter, e.g., **Red Cross Shelters**. **https://www.redcross.org/get-help/disaster-relief-and-recovery-services/find-an-open-shelter.html**
- Visit **Drivetexas.org** for flooded roads and conditions.
- Sign up for your community or county warning system. Follow local weather alerts.
    - Sign up for alerts at **https://alerts.weather.gov/search?area=TX**
- Important Phone Numbers:
    - **2-1-1** for shelter, food and disaster services
    - **7-1-1** for Relay Texas Service
    - 1-800-452-9292 for TxDOT statewide road closures
    - 1-800-525-5555 for roadside assistance

Special Considerations

In the event of a hurricane evacuation from low-lying coastal areas, existing highway lanes, both freeway and non-freeway, may be converted into "contraflow lanes." Contraflow is when vehicles travel in the opposite direction of a lane's normal traffic flow.
This occurs during an event like a hurricane evacuation, when all traffic lanes move toward inland safety and away from the Gulf Coast. A hurricane evacuation lane is an extra wide shoulder that is converted into an active thru lane in order to increase capacity during an emergency.



When an evacuation instruction is issued, utilize the prescribed evacuation route to move inland and away from the coast. Once you are out of the area update Nexus Renewables on your location and status. Continue to monitor local news networks, the TDEM website, and the Brazoria County Government Emergency Management website. When repatriation to the BESS sites is authorized by the government and Nexus Renewables return to the sites to conduct a damage assessment.

Annual Drill

Since both BESS sites are located in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of this hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. Additionally, for drills including the activation of the hurricane annex, the drill notice email must specify that the hurricane annex is being drilled.

TDEM Region 4 Personnel

Assistant Chief Shaun Miller, Shaun.Miller@tdem.texas.gov, 281-517-1353
Preparedness & Response Section Chief, Blake White
Blake.White@tdem.texas.gov
281-244-8380

Recovery & Mitigation Section Chief, Michelle Ellis

Michelle.Ellis@tdem.texas.gov
512-952-9061

District Chief (DC 16 Houston), Robert Saunders
Robert.Saunders@tdem.texas.gov
346-325-9259

The notice to the Commission must include the date, time, and location of the drill and should be emailed to **drillnotice@puc.texas.gov**. Additionally, although not required, you may also include information about which portion of the EOP is being drilled. You do not need to file the drill notice in Docket No. 53385. After performing the drill, there are no further reporting requirements. If a drill is rescheduled to a date after the initial 30-day notice period, an additional 30-day notice period is not required. An updated drill notice with the new date, time, and location is still required to be emailed to **drillnotice@puc.texas.gov**.

Cybersecurity Annex

Nexus Renewables' cybersecurity program is designed to protect the network, the BESS operating systems, and other electronic equipment from unauthorized intrusion. The Chief Technology Officer (CTO) is responsible for implementing Nexus Renewables' information security and cybersecurity program. The CTO is supported by the IT Department, which oversees all IT data and communication networks, services, and programs. Due to the sensitive nature of the company's cybersecurity and information security program, this section only provides a summary overview of prevention and mitigation measures. Please contact the IT Department for more information about Nexus Renewables' IT Disaster Recovery Plan and policies.

Key elements of Nexus Renewables' information security incident response program are as follows:

- Protection of data.
- Assessment of scope.
- Containment.
- Escalation of incident.
- Investigation/identification.
- System monitoring.
- Notification of affected individuals.
- Post-mortem and lessons learned.
- Mitigation/restoration.

Nexus Renewables' cybersecurity protection measures include:

- The network is monitored via an intrusion prevention system, and suspicious activity or threat alerts are issued.
- Antivirus software is placed on all workstations and servers.
- Software patches are installed on a timely basis to address security vulnerabilities.
- Restrictive local administrator rights prevent unauthorized software downloads and computer setting changes.
- The network is segmented to prevent lateral system cybersecurity attacks.
- The data loss prevention system tracks the electronic movement of Nexus Renewables documents.

Employee Cybersecurity Responsibilities

- Adhere to all Nexus Renewables cybersecurity and information security policies.
- Participate in cybersecurity training.
- Respond to all IT Department requests to update your computer and BESS operating software with the latest antivirus software upgrades.
- Immediately report a cybersecurity incident or breach to the IT Department.
- Do not open a suspicious email and never click on an embedded link or attachment in an email from an unknown or suspicious source.
- Do not use or disclose confidential or proprietary information.
- Protect your mobile devices with robust passwords and only install apps from trusted sources. Do not use public Wi-Fi to conduct Nexus Renewables business.
- When traveling, only use a virtual private network (VPN) connection to conduct Nexus Renewables business.
- Use strong passwords:
    - Ensure passwords include a combination of letters and numbers or unique phrases.
    - Do not use the same password twice and do not share your password with anyone.

Special Considerations

- Employees need to educate themselves on current and evolving cybersecurity threats such as malware, phishing, spear phishing, spoofing, denial-of-service, SQL injection attacks and other types of attacks.
- Employees must be familiar with Nexus Renewables' Cybersecurity Policy and Incident Response Plan.
- The IT Department monitors cybersecurity threats to Nexus Renewables and its employees.
- Employees must report cybersecurity breaches to the Chief Technology Officer or a member of the IT Department immediately.

Response

- If an employee suspects a cybersecurity attack via a suspicious email or social engineering attempt, it must be reported immediately to the IT Department. Employees should alert the IT Help Desk to the suspect email.
- Employees can report cybersecurity threats or incidents to the IT Department. They should provide the following information:
    - Computer or laptop name.
    - Location or IP address.
    - Mobile device type (if affected).
    - If the threat involves an email attack, send a photo of the email to the IT Department.
- If an employee is a victim of a successful cybersecurity attack, they must report it immediately to the Chief Technology Officer or the IT Department.
- Employees are not to turn off their computers, laptops or cell phones until they receive direction from the Chief Technology Officer or a member of the IT Department.
- The Chief Technology Officer will evaluate the seriousness of the cybersecurity attack and coordinate the response with the Incident Commander and third-party cybersecurity contractors, if necessary.

Physical Security Annex

The Nexus Renewable's physical security program for the Bell Creek and Brazos River Battery Energy Storage System (BESS) sites is intended to protect Nexus Renewable personnel, contractors, visitors, property, equipment, and operating systems from unauthorized access, damage, sabotage, theft of intellectual knowledge, and other criminal threats. Both BESS sites are in West Columbia, Texas. The physical security program utilizes both active and passive measures designed to safeguard the site, equipment, community, and the environment.

Key elements of Nexus Renewables' physical security program are as follows:

- Physical access barriers including such measures as fences, locks, and road barricades
- Training of staff and contractors to utilize physical security measures and to detect intruders
- Intruder detection and alarms to discourage unauthorized site and equipment access
- Annual physical security risk analysis and protective measures evaluation

Nexus Renewables will employ a variety of physical security measures to provide the capability to deter, detect, identify, track, assess, record, communicate, delay and respond to unauthorized access events.

Nexus Renewables' physical security measures include:

- Site layout and landscaping to reduce intruder concealment opportunities
- Signage indicating criminal trespass will be prosecuted
- Signage indicating who to call in the event of an emergency or unauthorized access
- Lighting to discourage approaching site after dark
- Perimeter fences to keep out criminal trespassers, animals, and children
- High security padlocks to limit access to the site and the BESS cabinets to authorized persons
- Perimeter intrusion detection to alert remote staff of unauthorized entry
- Cameras to identify site intrusion
- Remote monitoring to promote rapid response to intrusion
- The education of local law enforcement agencies to enhance their effectiveness in protecting the sites.

Employee Security Responsibilities

- Adhere to all Nexus Renewables security policies.
- Participate in security training.
- Maintain liaison with local law enforcement agencies to share threat intelligence.
- Report any evidence of prior unauthorized site or equipment access.
- Follow all procedures for accessing and securing the site and the BESS equipment.
- Do not take shortcuts that would compromise security.
- Be alert and report any indication of deliberate access attempts, security probing, and access by falsification of credentials.

Special Considerations

- Employees need to educate themselves on current and evolving threats such as protests, civil disobedience, local acts of vandalism, and social media challenges.
- Employees must be familiar with the Nexus Renewables' Security Policy and Incident Response Plan.

Response

- If an employee or contractor suspects unauthorized access to either Bell Creek or the Brazos River BESS site, they should immediately dial 911 and request the police to respond.
- If unauthorized access is suspected the employee or contractor is not to attempt to apprehend, capture, or detain the individual or individuals.
- Employees or contractors are expected to remain available to assist the local law enforcement agency with access to the site and guidance on safe conduct while within the fence line of the site.
- Employees are to report unauthorized access concerns or incidents to the Nexus Renewables security director and the site project manager.

Hithium Hazard Mitigation Analysis Annex

Editor's Note:

This Emergency Response and Emergency Operations Plan is intended to be submitted with the Hithium Hazard Mitigation Analysis and the Hithium Emergency Response Guide. However, the Hazard Mitigation Analysis is 43 pages in length and the emergency response guide is 27 pages in length. Due to their size they were not directly incorporated in this document.

Hithium Emergency Response Guide Annex

Editor's Note:

This Emergency Response and Emergency Operations Plan is intended to be submitted with the Hithium Hazard Mitigation Analysis and the Hithium Emergency Response Guide. However, the Hazard Mitigation Analysis is 43 pages in length and the emergency response guide is 27 pages in length. Due to their size they were not directly incorporated in this document.