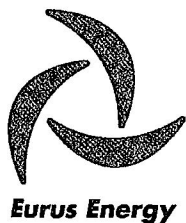




## Filing Receipt

**Received - 2022-04-13 08:03:53 PM**  
**Control Number - 53385**  
**ItemNumber - 37**





**Bull Creek Wind LLC**

9255 Towne Center Drive  
Suite 840  
San Diego, CA 92121

TEL: 858-638-7115  
FAX: 858-638-7125

Via Online Filing

April 13, 2022

Public Utility Commission of Texas  
1701 N. Congress Avenue,  
Austin, Texas, 78711-3326

Attention: Filing Clerk, Central Records

**Re: Project No. 53385: Emergency Operations Plan  
Bull Creek Wind LLC; PUCT Registration No. 20228**

Dear Central Records Filing Clerk:

In accordance with PUCT Rule 25.53(c)(1), Bull Creek Wind LLC hereby files the following:

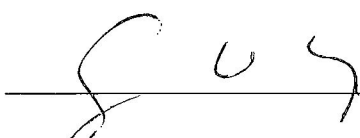
- (a) An executive summary of the updated Emergency Operations Plan ("EOP") for the Bull Creek Wind Farm, including references to specific sections and a redacted version of the record of distribution;
- (b) A complete copy of the EOP with confidential portions removed; and,
- (c) An affidavit from the President and Chief Executive Officer of Bull Creek Wind LLC.

We are separately filing a complete copy of the unredacted, confidential EOP directly with ERCOT, as required by Rule 25.33.

Please contact the undersigned if you have any questions. We appreciate your time and assistance.

Very truly yours,

BULL CREEK WIND LLC, a Delaware limited liability company

By:   
Anthony Cresap  
Senior Legal Counsel





**Bull Creek Wind LLC**  
9255 Towne Centre  
Drive Suite 840 San  
Diego, CA 92121 TEL:  
858-638-7115 FAX:  
858-638-7125

# **BULL CREEK WIND EMERGENCY OPERATIONS PLAN**

## **EXECUTIVE SUMMARY**

(PUCT Rule §25.53: Electric Service Emergency Operations Plans)

*Updated April 13, 2022*

This Executive Summary is of the Emergency Operations Plan (“EOP”) adopted by Bull Creek Wind LLC (“BCW”) for the Bull Creek Wind Farm (the “Facility”) and filed with the Public Utility Commission of Texas (“PUCT”) under PUCT Rule 25.53 (Texas Admin. Code, Title 16, part 2, as adopted February 25, 2022, under Project No. 51841) (“Rule 25.53”).

The EOP contains the following:

- 1) An Approval and Implementation section (beginning page 1) that:
  - describes the regulatory background of the EOP and its adoption and implementation;
  - identifies when the EOP is activated and the parties involved in a response;
  - describes the Facility and its operations; and,
  - identifies the personnel responsible for maintaining, implementing and editing the EOP.
- 2) A Record of Distribution listing the personnel and offices receiving the EOP, and the dates of their training of the EOP (**Annex A**);
- 3) A Communication Plan section (beginning page 3), that:
  - Directs certain personnel to respond to emergencies;
  - Incorporates an Emergency Communication Procedure and Contact List (**Annex B**) that sets forth the protocols for identifying emergency situations, internal communications among Facility and BCW personnel and outside parties, and incident reporting.
- 4) A Supplies section (page 4) that describes supplies during emergencies and refers to an **Annex C** setting for the BCW plan for dealing with supplies.
- 5) A Staffing section (page 4) that describes staffing for the Facility during emergencies.



- 6) An Extreme Weather Emergencies section (beginning page 4) that sets forth BCW's plan for identifying weather-related emergencies, and refers to **Annex D**, which includes discusses considerations and procedures for specific categories of weather emergencies, including extreme temperatures, freezing temperatures, hot weather emergencies, extreme winds, extreme precipitation events, staffing during weather emergencies, and weather drills.
- 7) A section on Drills (page 5) describing the obligation for drills, as well as their scope and conduct;
- 8) A Reporting Requirements section (page 5) that directs Facility staff to procedures for reporting emergencies internally and externally.
- 9) A Restoration of Service Annex (**Annex E**), that describes steps for personnel to take in the event of any failure to start or trip offline due to a hazard or threat affecting Facility operations.
- 10) A Pandemic and Epidemic Annex (**Annex F**), that describes the BCW policy for operations during pandemics.
- 11) A Cyber Security Annex (**Annex G**) that sets forth an essential checklist for identifying and responding to cyber attacks or threats, and incorporates the existing Cyber Security policy for the Facility already in effect under NERC.
- 12) A Physical Security Annex (**Annex H**) that describes procedure for responding to physical threats or intrusions.

## **Annexes**

The EOP contains the following Annexes (§ 25.53 (e)(2))

Annex A – Record of Distribution

Annex B - Bull Creek Emergency Communication Procedure and Contact List

Annex C - Emergency Supplies Plan

Annex D - Extreme Weather Emergencies

Annex E - Restoration of Service Annex

Annex F - Pandemic and Epidemic Annex

Annex G - Cyber Security Annex

Annex H - Physical Security Annex



Revised April 13, 2022

**Annex A**

**Record of Distribution**

The EOP is being distributed to all personnel involved with overseeing BCW facility operations, summarized in the following table:

| <b>Name</b> | <b>Title/ Affiliation with Facility</b>  | <b>Date of Training</b> |
|-------------|--|-------------------------|
| [REDACTED]  | BCW Facility Site Manager  | [REDACTED]              |
| [REDACTED]  | BCW Senior Operations Engineer   |                         |
| [REDACTED]  | Assistant Vice President of BCW Site Operations [REDACTED]   |                         |
| [REDACTED]  | BCW Senior Operations Engineer   |                         |
| [REDACTED]  | Senior Counsel, BCW, and PUCT Regulatory Representative  |                         |
| [REDACTED]  | Personnel at EDF Renewable Services ("EDF") who are responsible for managing the Facility's 24/7 Remote Operations Control Center ("ROCC") |                         |
| DWT         | Personnel at Deutsche Windtechnik (DWT) who are contracted to perform turbine maintenance at the Facility                                  | N/A                     |
| ERCOT       | Electric Reliability Council of Texas (ERCOT) shall receive a copy of BCW Executive Summary and unredacted Emergency Operations Plan (EOP) |                         |
| PUCT        | Public Utility Commission of Texas (PUCT) shall receive Executive Summary and redacted copy of BCW Emergency Operations Plan (EOP)         |                         |





**Bull Creek Wind LLC**

9255 Towne Centre Drive  
Suite 840  
San Diego, CA 92121  
TEL: 858-638-7115  
FAX: 858-638-7125

## **BULL CREEK WIND EMERGENCY OPERATIONS PLAN**



(PUCT Rule §25.53: Electric Service Emergency Operations Plans)

*Updated April 13, 2022*

This Emergency Operations Plan (“EOP”) is adopted by Bull Creek Wind LLC (“BCW”) for the Bull Creek Wind Farm (the “Facility”).

### **Approval and Implementation (Rule 25.53 (d)(1))**

This EOP sets forth BCW’s plan to effectively respond to and address the range of emergency and hazardous situations that may affect Facility generation and operations. It is adopted to comply with all requirements under newly amended Rule 25.53 of the Public Utility Commission of Texas (“PUCT”) (Texas Admin. Code, Title 16, Part 2, as adopted February 25, 2022, under Project No. 51841) (“Rule 25.53”).

BCW shall annually review this EOP, including all Annexes, to confirm the extent to which amendments may be necessary. If material changes are made to the information, an update or revised version shall be submitted to the Public Utility Commission of Texas (PUCT) on or before March 15<sup>th</sup> following the requirements set forth in Rule 25.53. A revision control summary is set forth at the very end of this document.

Implementation of the EOP shall be coordinated with reliability measures and policies implemented by BCW personnel pursuant to the standards and regulations of other applicable agencies including, but not limited to, the North American Energy Reliability Corporation (“NERC”) and the Electric Reliability Council of Texas (“ERCOT”), Office of Public Utility Counsel (“OPUC”) (PUCT, NERC and ERCOT are herein each referred to as a “Regulatory Agency”).





Revised April 13, 2022

**Facility Description:** The Facility is a 180 MW wind energy generation plant in Borden County, TX, and consists generally of the following facilities and equipment: (a) 180 Mitsubishi Heavy Industries (MHI) wind turbines model MWT62/1.0, each rated at 1MW, and

**Operations Summary:**

**Responsible Personnel**

The individuals responsible for maintaining and implementing this EOP are as follows:

**The persons who can edit the EOP:**



**Record of Distribution (Rule 25.53 (c)(4)(A))**

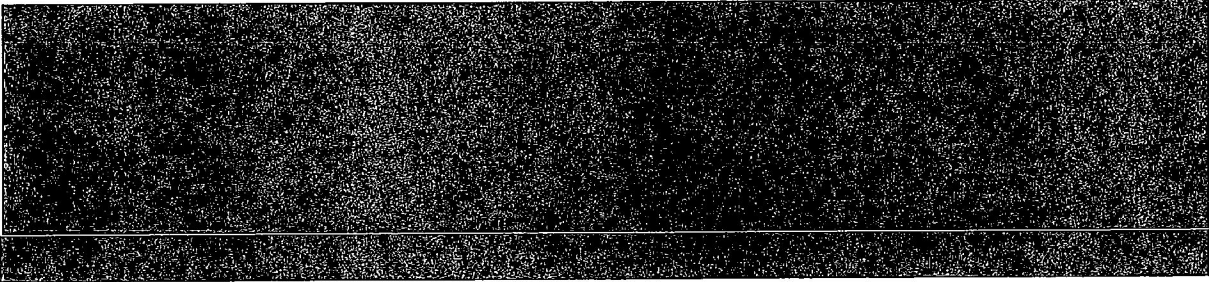
The record of distribution of this EOP, as described in Rule 25.53 subsection (c)(4)(A), is set forth in **Annex A**.

**Communication Plan (Rule 25.53 (d)(2))**

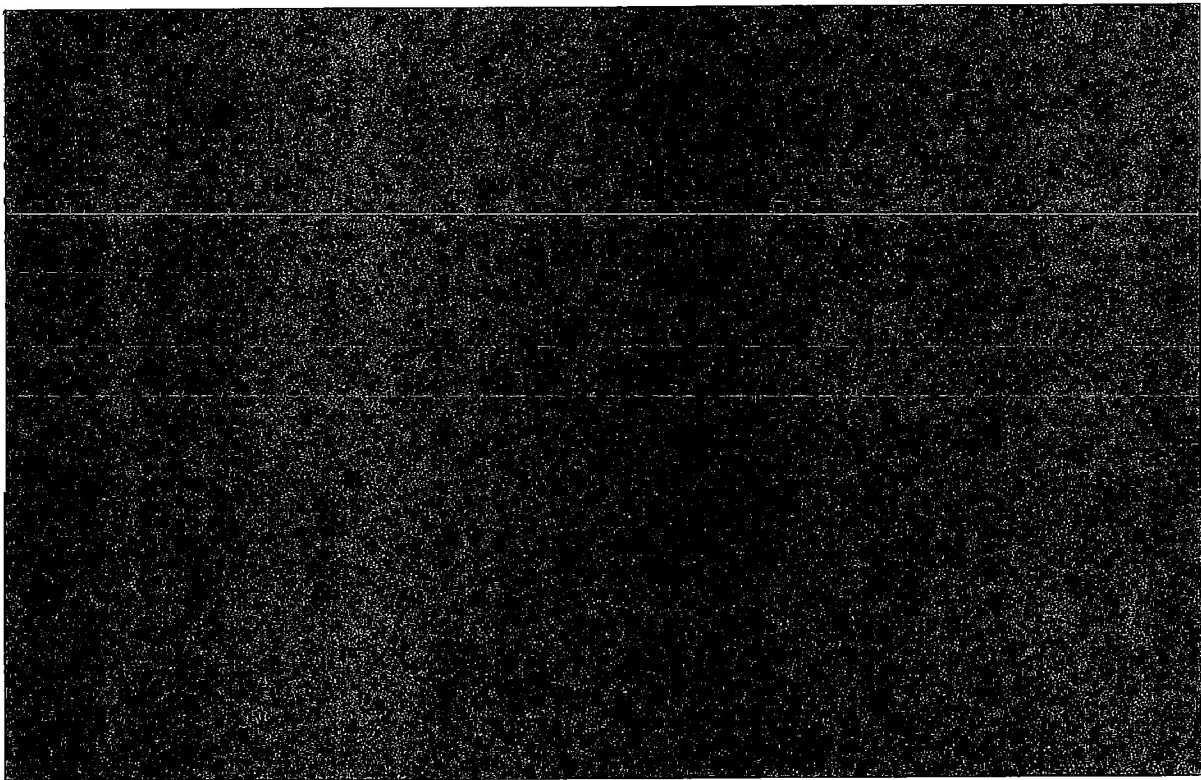


Revised April 13, 2022

Supplies for Emergency Response (Rule 25.53 (d)(3))

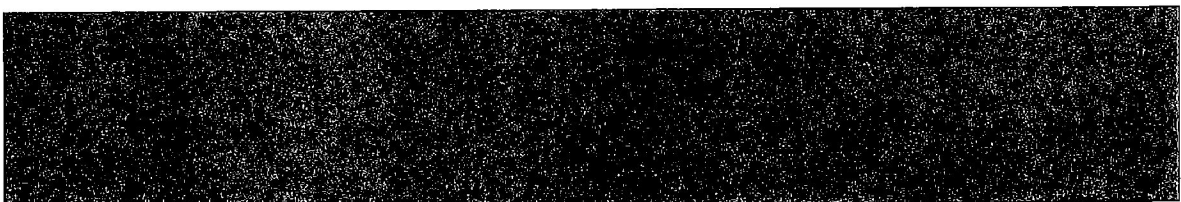


Staffing During Emergency Response (Rule 25.53 (d)(4))



Extreme Weather Emergencies (Rule 25.53 (d)(5) and (e)(2))

The Facility's plan for identifying weather-related hazards is as follows:





[REDACTED]

Revised April 13, 2022

[REDACTED]

**Drills:**

[REDACTED]

**Reporting Requirements:**

[REDACTED]

**Copy Available for Inspection:** Copies of this Bull Creek Emergency Operations Plan have

[REDACTED]

**Amendments:**

[REDACTED]



**Annexes (Rule 25.53 (e)(2))**

The following is a summary of the Annexes as required under Rule 25.53. Referenced Annexes are:

Annex A – Record of Distribution

Annex B - Bull Creek Emergency Communication Procedure and Contact List

Annex C - Emergency Supplies Plan

Annex D - Extreme Weather Emergencies

Annex E - Restoration of Service Annex

Annex F - Pandemic and Epidemic Annex

Annex G - Cyber Security Annex

Annex H - Physical Security Annex

**Annexes Not Included:**

Water Shortage Annex / Water shortages: (25.53(e)(2)(D)) [REDACTED]

[REDACTED]

Hurricane preparedness plan: (25.53(e)(2)(E)) [REDACTED]

[REDACTED]



Revised April 13, 2022

**Revision Control Summary**

Complete this section whenever edits are made to this EOP or to any of the annexes.

| Date of change | Sections Amended | Approval Signature(s) |
|----------------|------------------|-----------------------|
|                |                  |                       |
|                |                  |                       |
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|                |                  |                       |
|                |                  |                       |

The last comprehensive update to this EOP was approved effective April 13, 2022, and supersedes and replaces all previous EOPs or amendments adopted.



Revised April 13, 2022

**Annex A**

**Record of Distribution**

The EOP is being distributed to all personnel involved with overseeing BCW facility operations, summarized in the following table:

| <b>Name</b> | <b>Title/ Affiliation with Facility</b>  | <b>Date of Training</b> |
|-------------|--|-------------------------|
| [REDACTED]  | BCW Facility Site Manager  | [REDACTED]              |
| [REDACTED]  | BCW Senior Operations Engineer   |                         |
| [REDACTED]  | Assistant Vice President of BCW Site Operations [REDACTED]   |                         |
| [REDACTED]  | BCW Senior Operations Engineer   |                         |
| [REDACTED]  | Senior Counsel, BCW, and PUCT Regulatory Representative  |                         |
| [REDACTED]  | Personnel at EDF Renewable Services (“EDF”) who are responsible for managing the Facility’s 24/7 Remote Operations Control Center (“ROCC”) |                         |
| DWT         | Personnel at Deutsche Windtechnik (DWT) who are contracted to perform turbine maintenance at the Facility                                  | N/A                     |
| ERCOT       | Electric Reliability Council of Texas (ERCOT) shall receive a copy of BCW Executive Summary and unredacted Emergency Operations Plan (EOP) |                         |
| PUCT        | Public Utility Commission of Texas (PUCT) shall receive Executive Summary and redacted copy of BCW Emergency Operations Plan (EOP)         |                         |



ANNEX B

Bull Creek Wind Emergency Operations Plan

**EMERGENCY COMMUNICATION PROCEDURE**

**AND EMERGENCY CONTACT LIST**

**Process:** In the event of any emergency affecting operations, at Bull Creek Wind Farm (the

[REDACTED]

**Procedure:** In the event of any emergency, [REDACTED]

[REDACTED]

1)

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

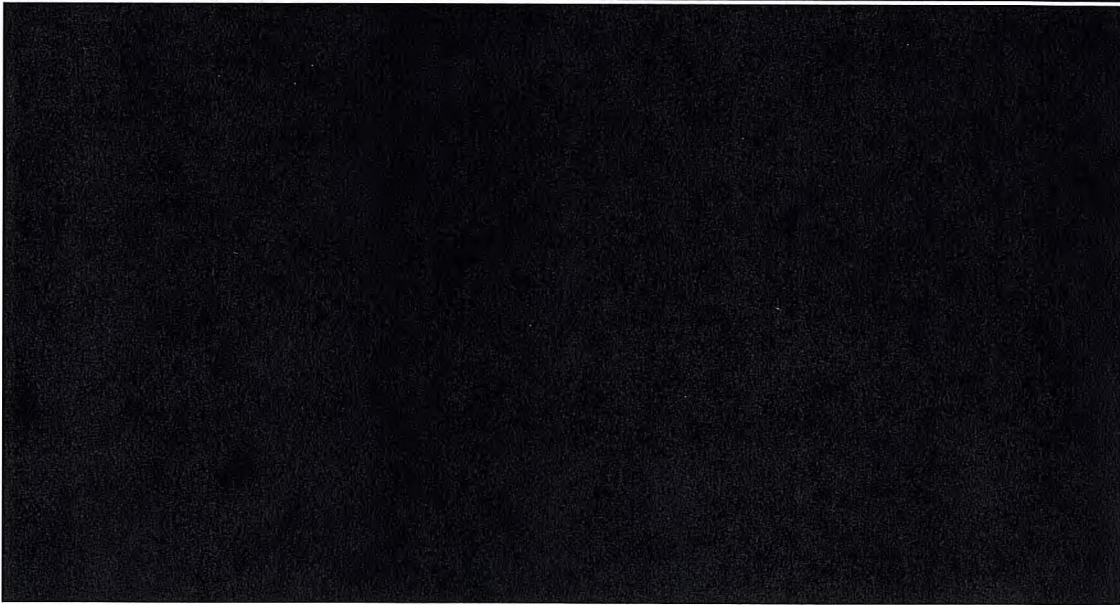
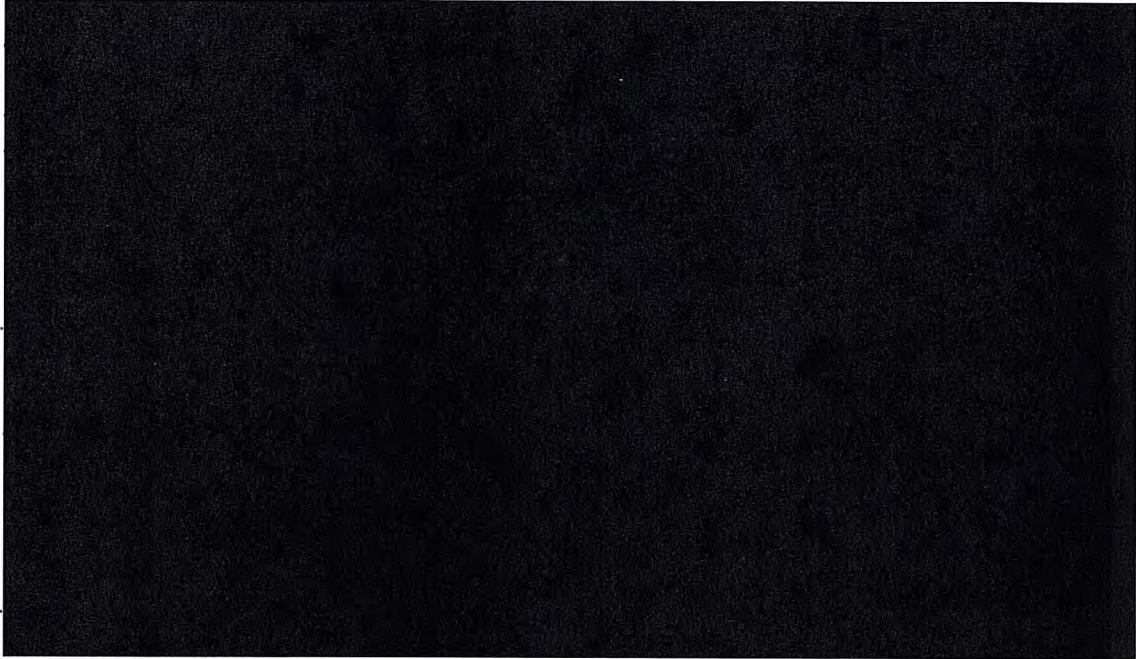
[REDACTED]

[REDACTED]

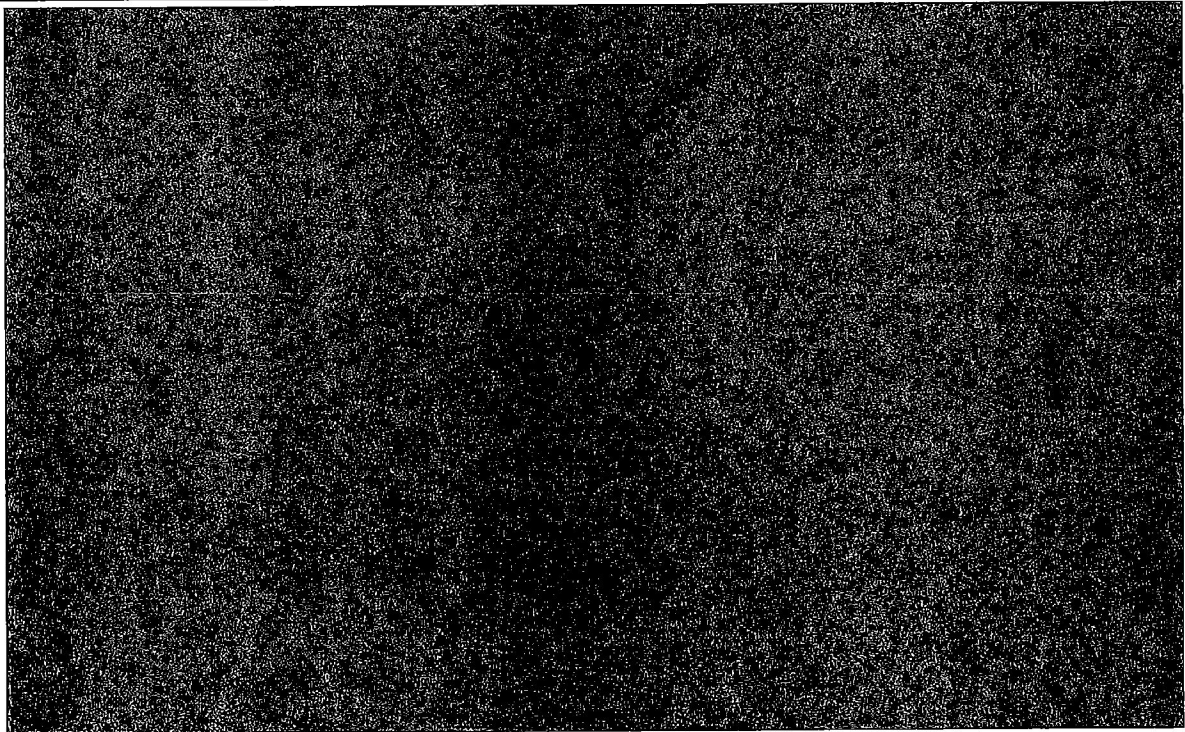
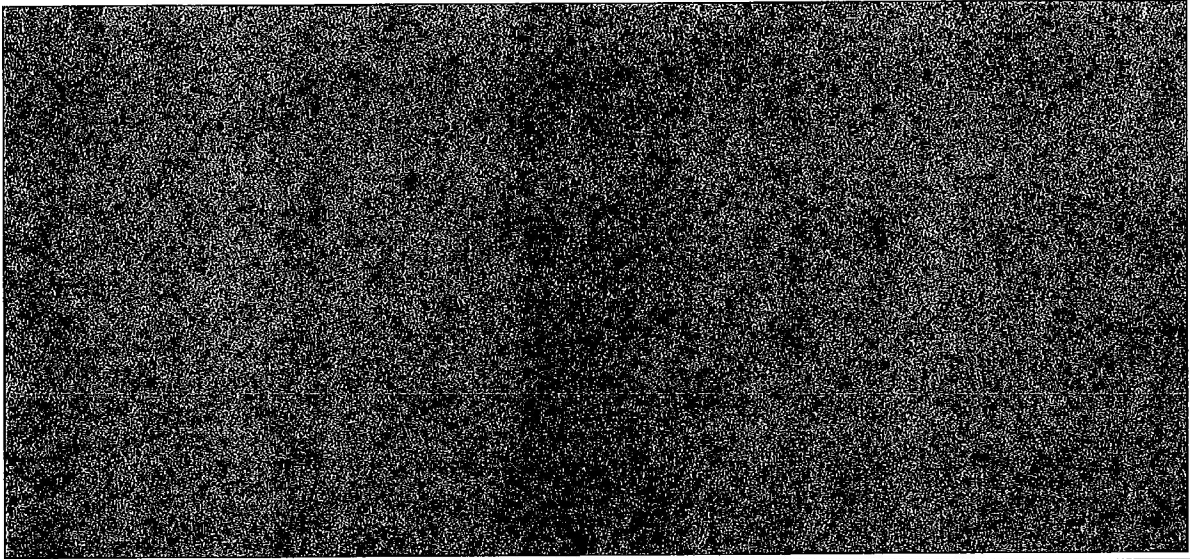
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**Bull Creek Emergency Contact List**





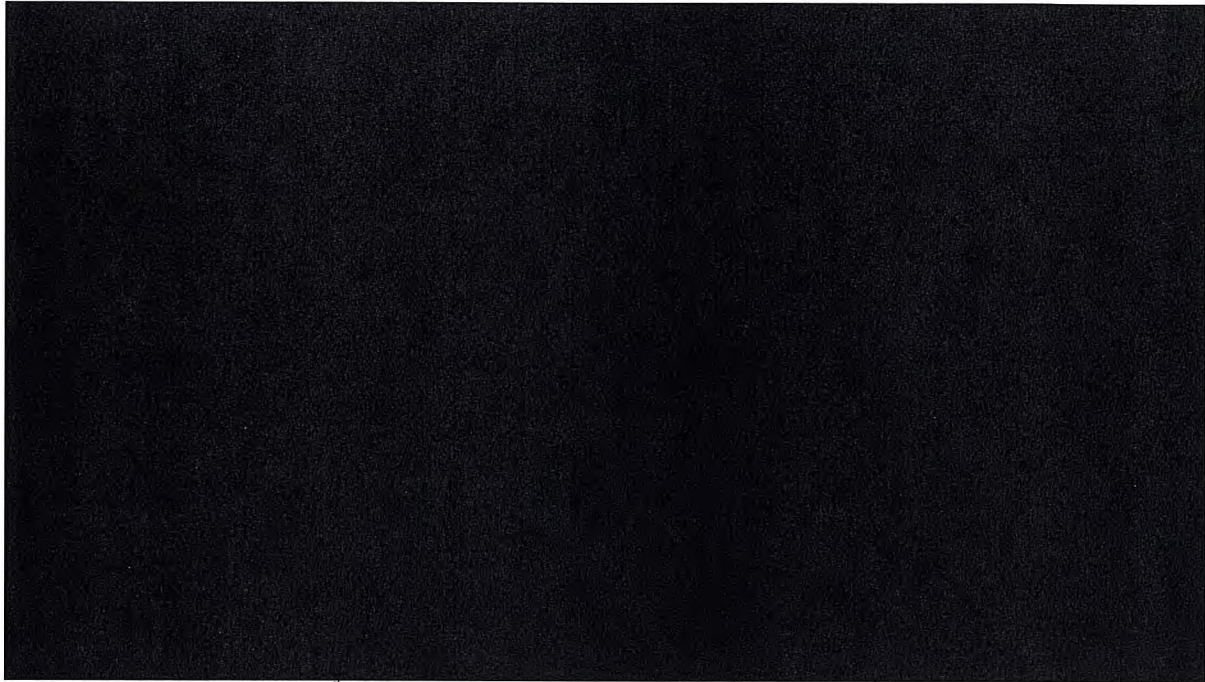




**ANNEX C**

Bull Creek Emergency Operations Plan

**BULL CREEK EMERGENCY SUPPLIES PLAN**



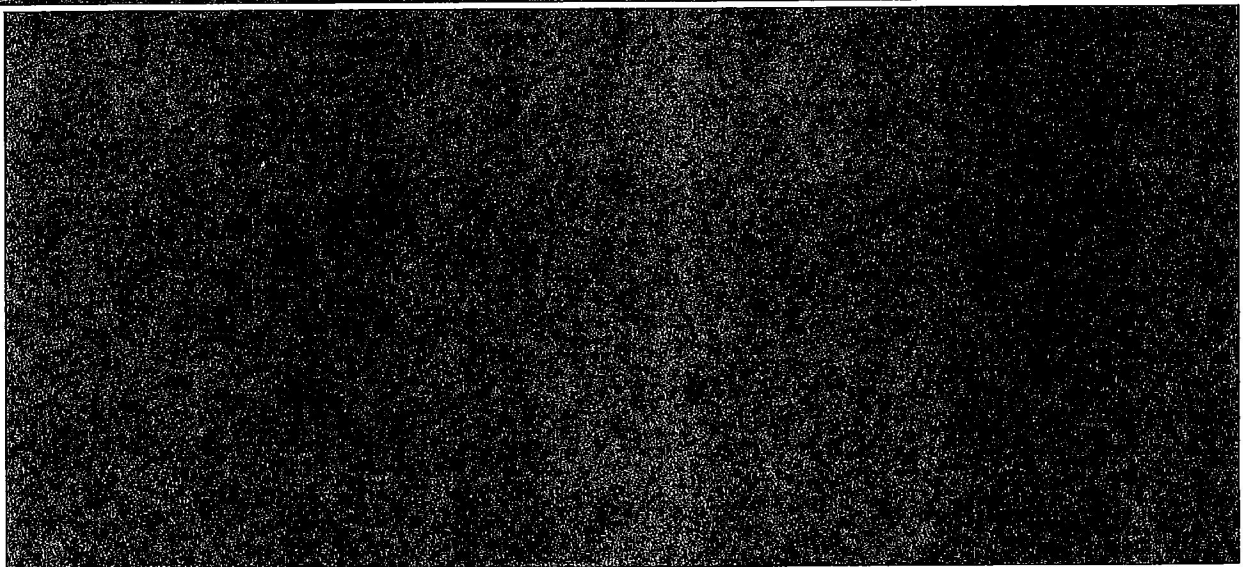
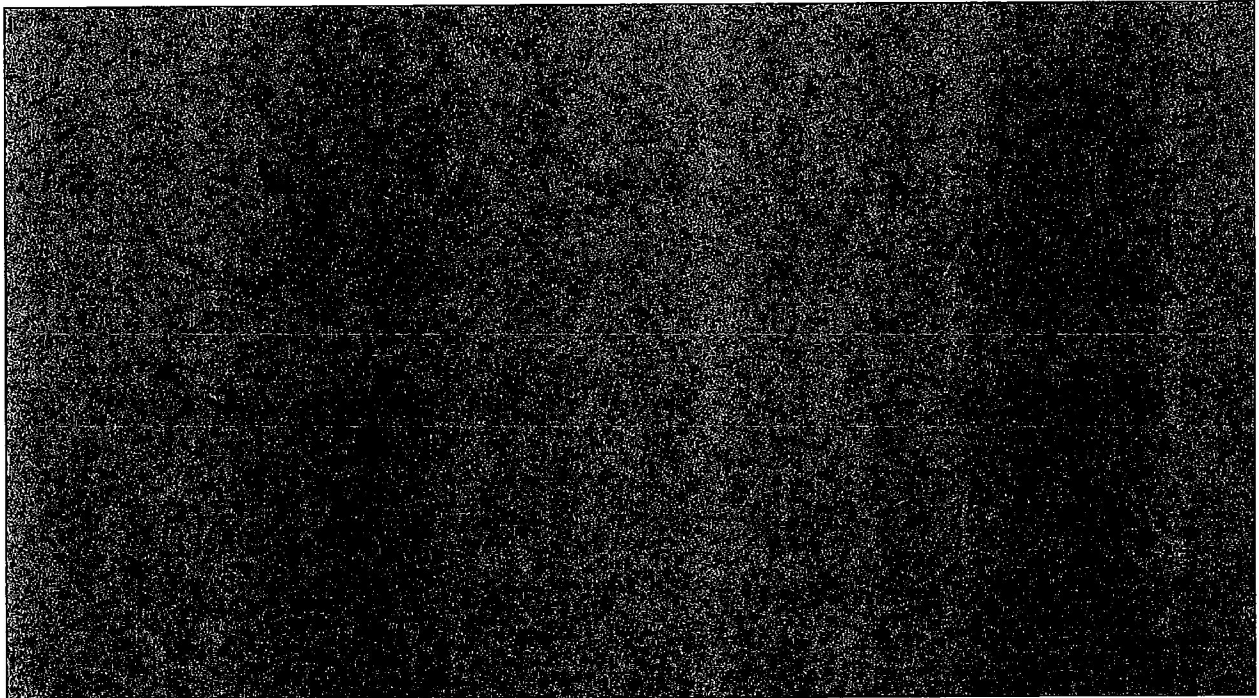


## ANNEX D

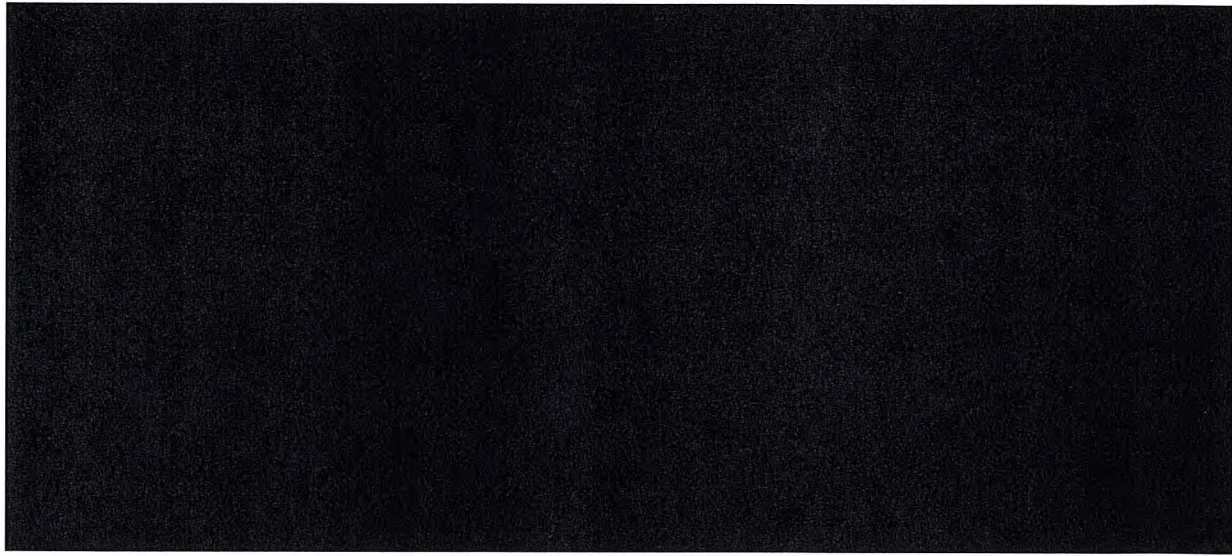
### Bull Creek Emergency Operations Plan

#### EXTREME WEATHER EMERGENCY PLAN

This Weather Emergency Plan sets forth actions to take in responding to an extreme weather emergency. This Plan shall focus only on BCW response to weather emergencies and shall be in addition to the Winter Weather Preparation procedures set forth at PUCT Rule 25.25.

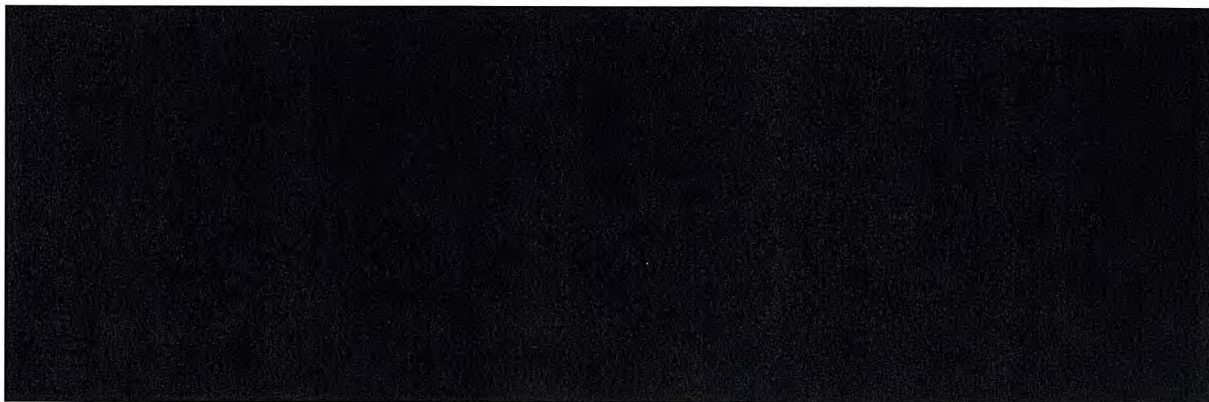
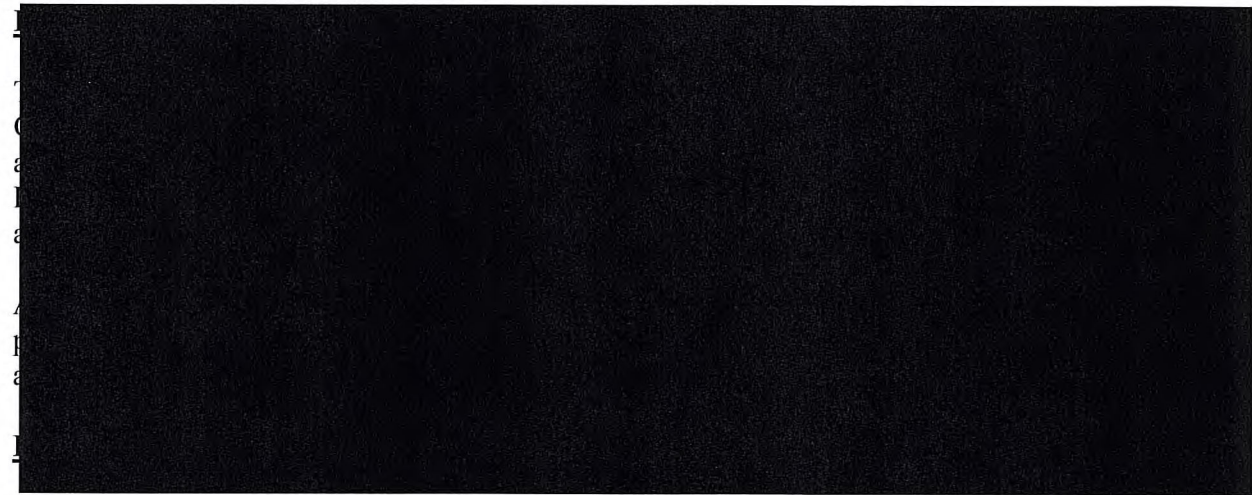




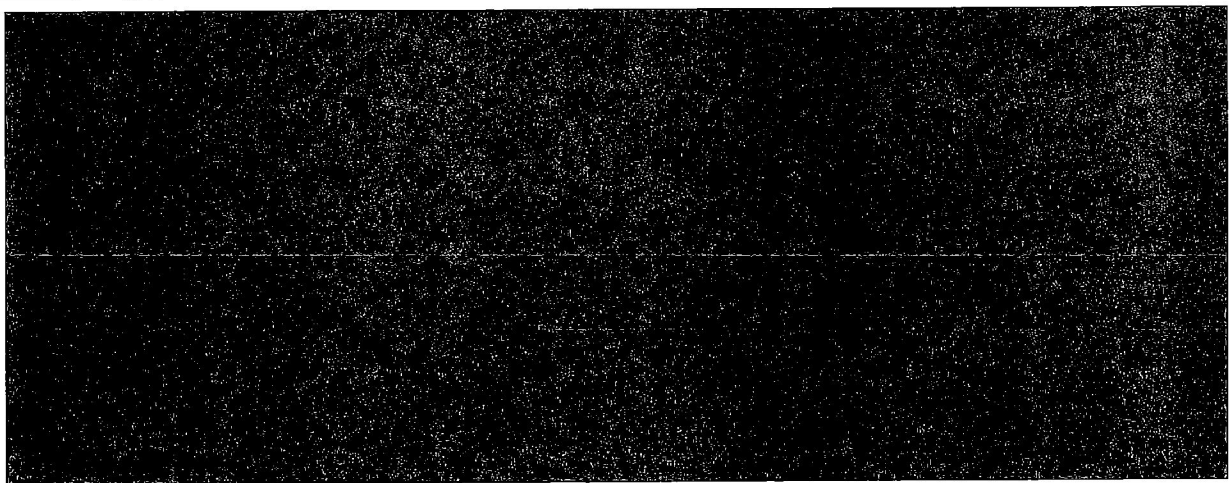
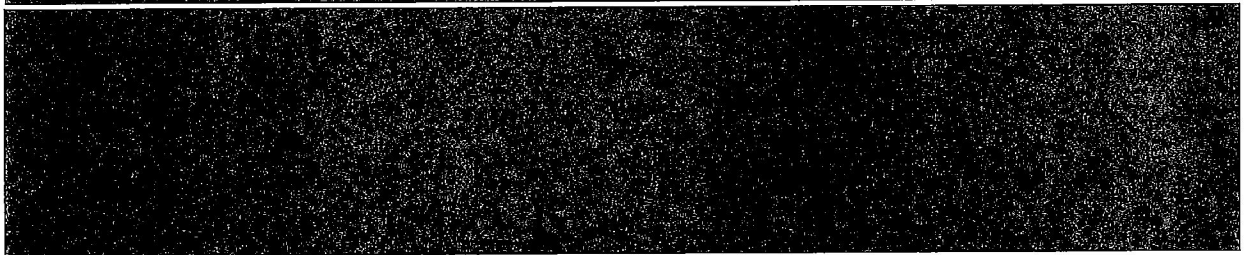
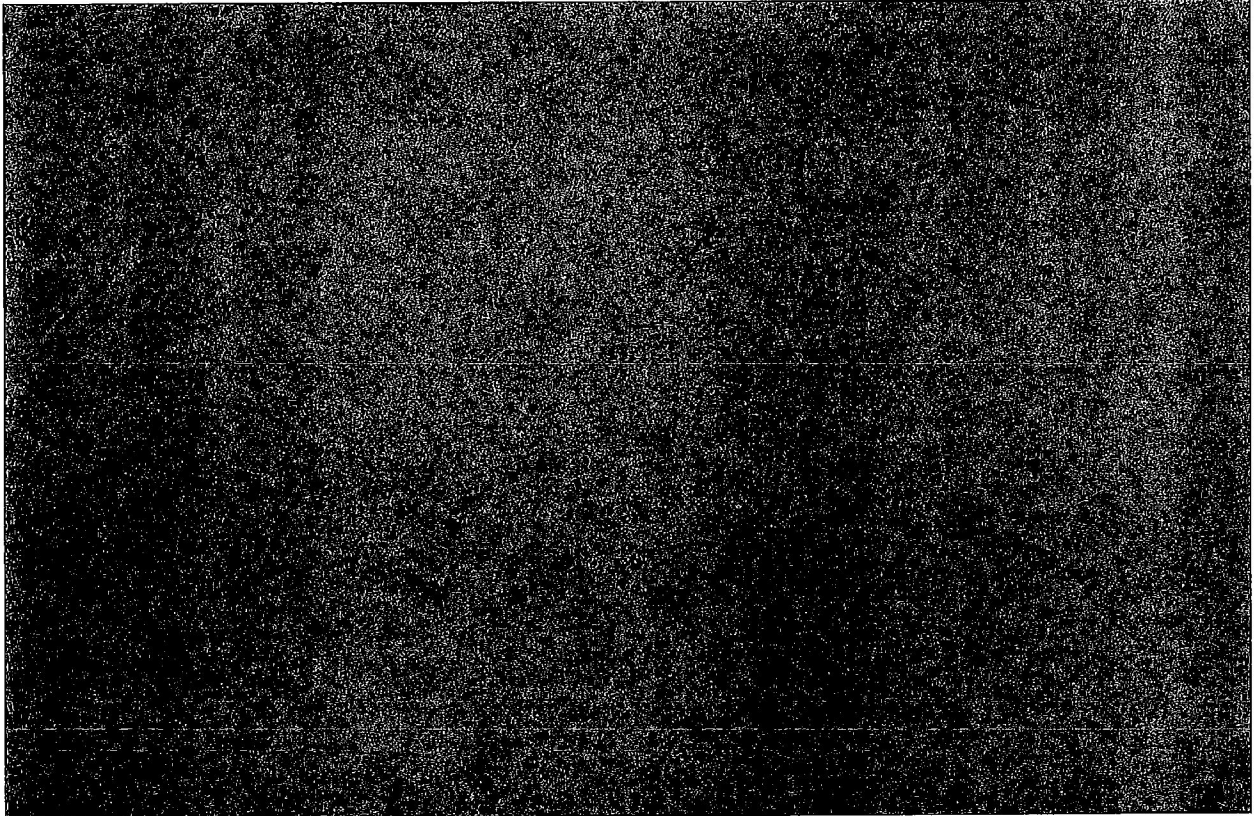


### Specific Weather Emergencies

Responses to specific types of weather emergencies is as follows:









[REDACTED]

[REDACTED]

[REDACTED]

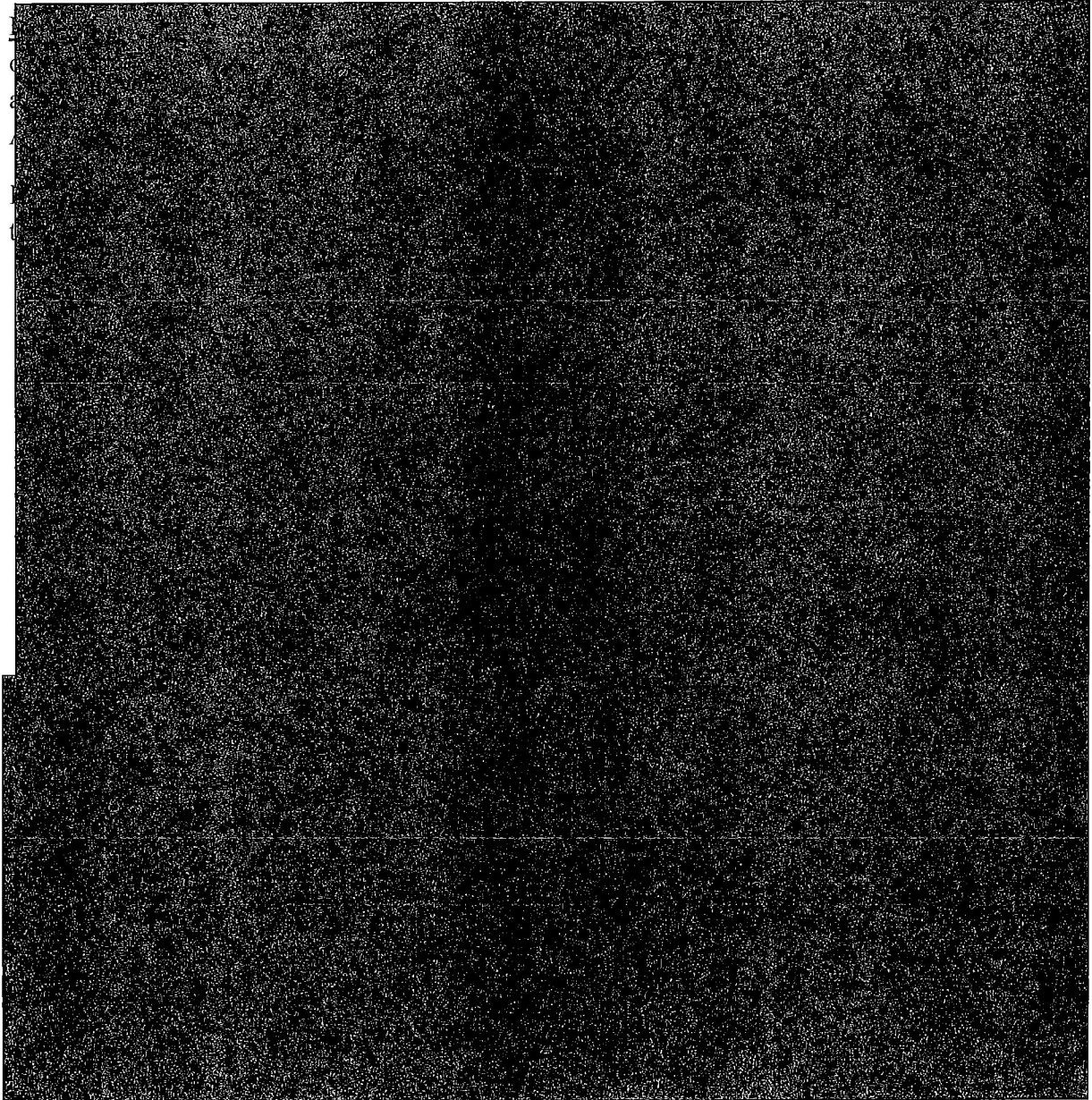
[REDACTED]



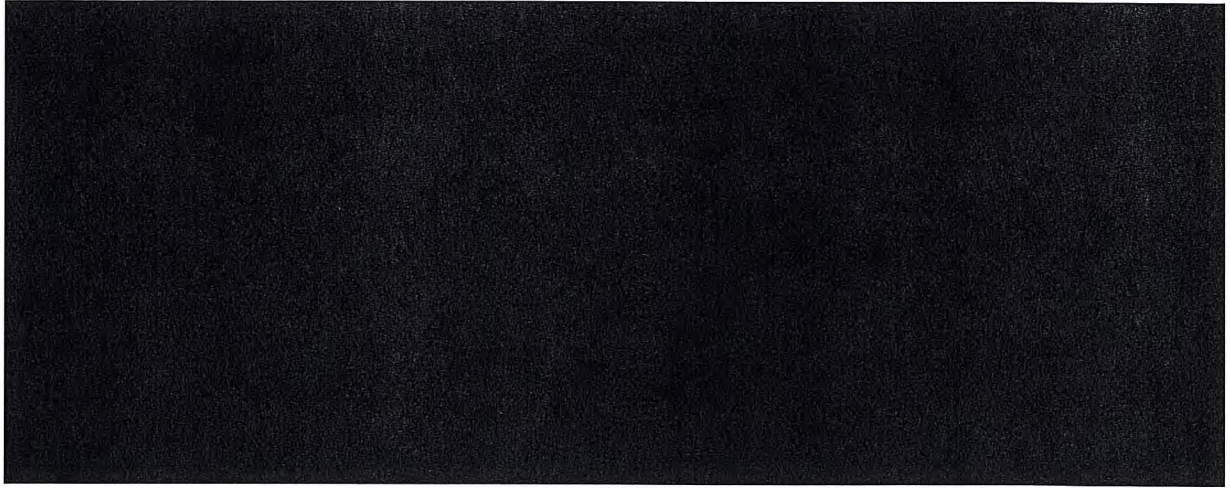
**ANNEX E**

Bull Creek Emergency Operations Plan

**RESTORATION OF SERVICE PLAN**









## Annex F

### Bull Creek Emergency Operations Plan

#### PANDEMIC & EPIDEMIC PLAN

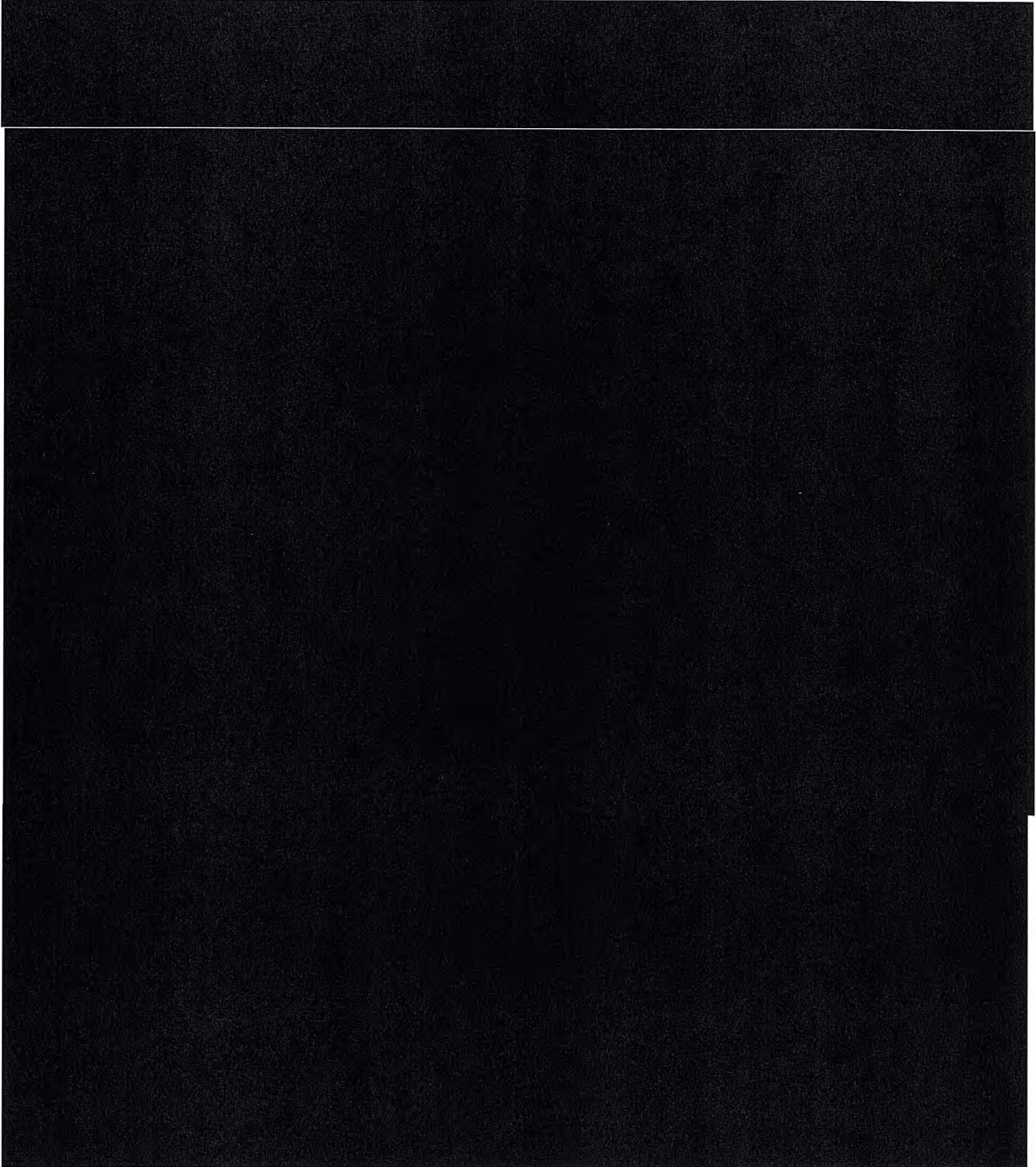




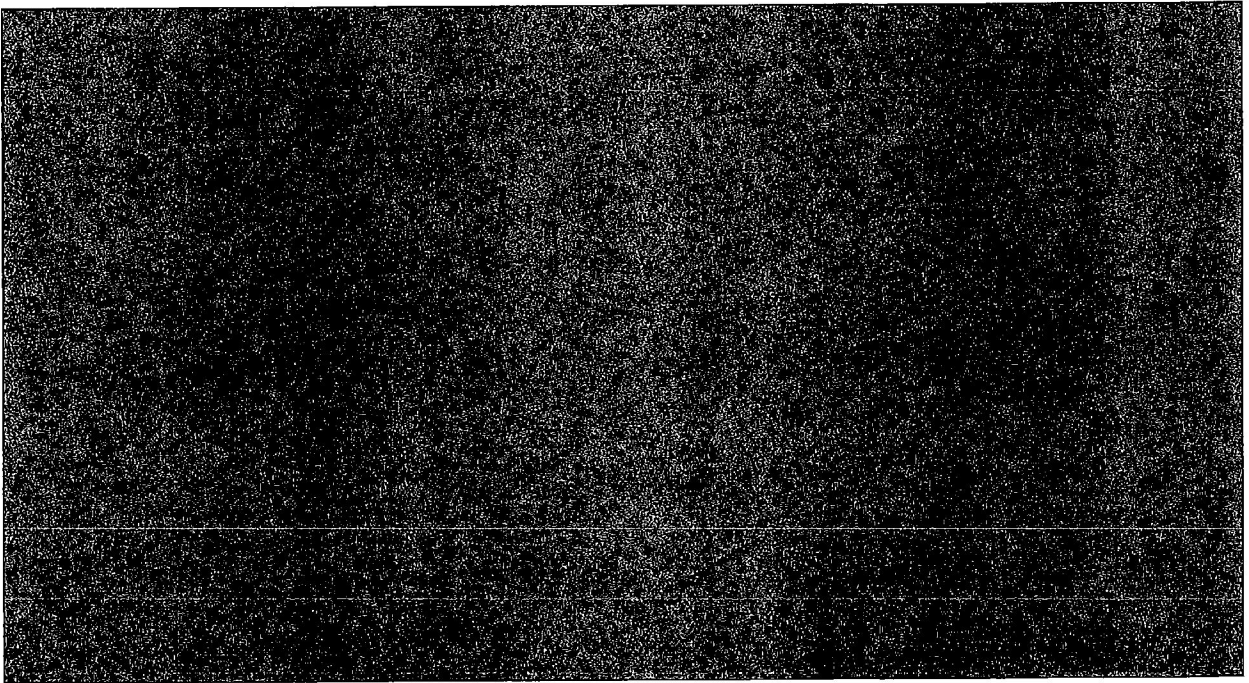
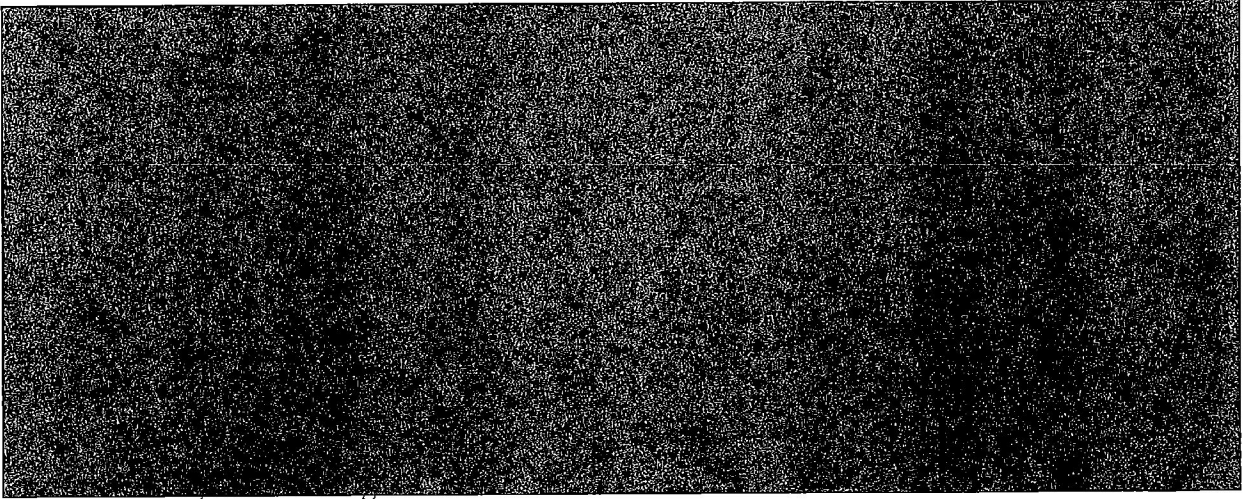
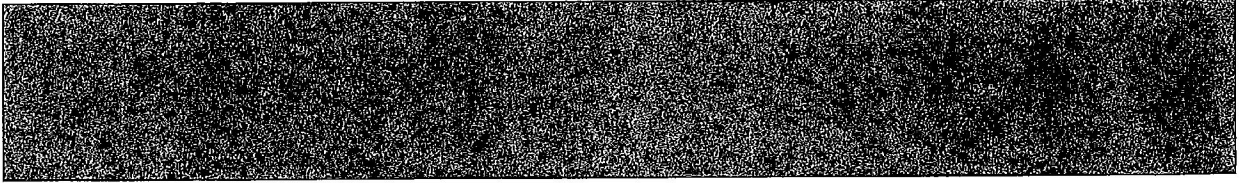
**ANNEX G**

Bull Creek Emergency Operations Plan

**CYBER SECURITY INCIDENT RESPONSE**







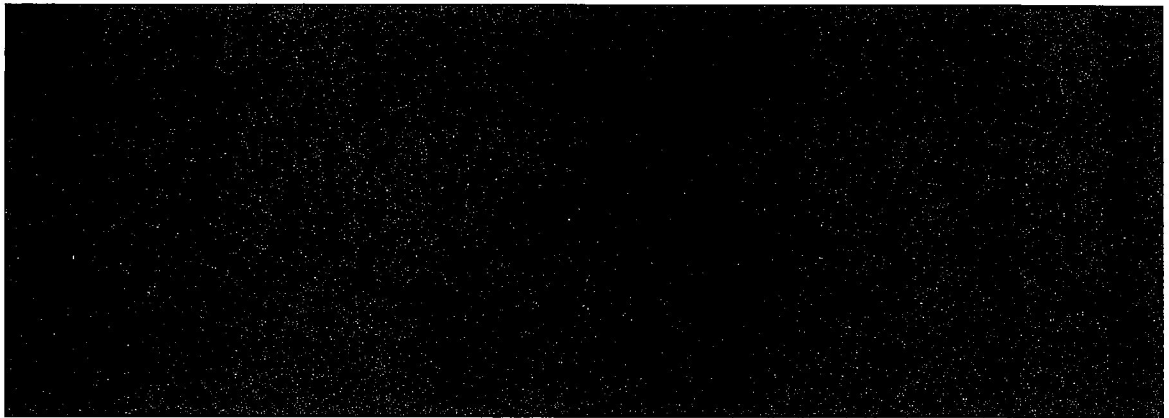
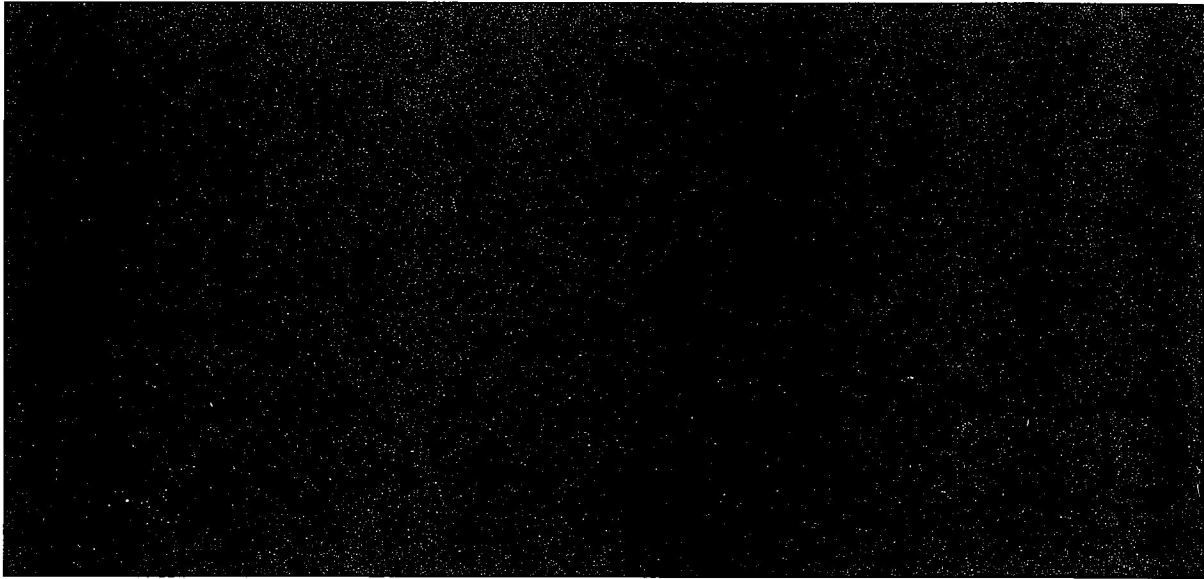


## **Annex H**

### **Bull Creek Wind Emergency Operations Plan**

*Updated April 13, 2022*

#### **Physical Security Emergency**





## AFFIDAVIT

### Public Utility Commission of Texas Rule 25.53 (c)(4)(C)

On this day personally appeared the undersigned Hidenori Mitsuoka, who, after being duly sworn, attested to the following:

- (a) I am President and Chief Executive Officer of Bull Creek Wind LLC (“BCW”), and I am entitled to make this Affidavit;
- (b) I understand this Affidavit will be submitted to the Public Utility Commission of Texas (“PUCT”) as part of our filing of the Emergency Operations Plan (“EOP”) for the Bull Creek wind farm (the “Facility”), as required under Texas Administrative Code Section 25.53 subsection (c)(4)(C);
- (c) On my best information and belief, I declare the following statements are true and correct:
  - (i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP,
  - (ii) all relevant personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
  - (iii) the EOP has been reviewed and approved by the appropriate executives and personnel involved with managing the Facility;
  - (iv) the first comprehensive drill for the EOP has been scheduled to take place during May, 2022, as required by subsection (f) of Rule 25.53;
  - (v) the EOP or an appropriate summary is being distributed to local jurisdictions as needed;
  - (vi) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and,
  - (vii) the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have been or will be scheduled during April and May, 2022, to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.



I hereby declare the foregoing to be true and complete to the best of my knowledge.

A handwritten signature in black ink, appearing to read 'H. Mitsuoka', is written over a horizontal line.

Hidenori Mitsuoka

President

Bull Creek Wind LLC, a Delaware limited liability company



## ACKNOWLEDGMENTS

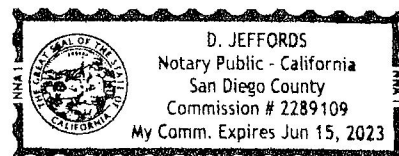
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

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

On April 13, 2022, before me, D. Jeffords, Notary Public, personally appeared Hidenori Mitsuoka, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

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

WITNESS my hand and official seal.



Signature D. J. [Signature]

(Seal)