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Akua Energy - TG East Wind Power, LLC Emergency Operations Drill

Introduction:

It is imperative to consider as many emergency-related issues as possible when developing the tasks for your Emergency Operations Drill (Drill). Equally as important is determining the appropriate staff to address these issues, timing, contracts and dependencies on external entities, all while maintaining clear and unambiguous instructions. This Drill is designed to ensure Akua Energy's TG East Wind Power, LLC addresses as many of these issues as possible, helping to ensure continued operations of its generating facilities during emergency conditions.

Staffing:

All TG East Wind Power personnel participating in the Drill will be notified directly, with a clear set of tasks to be completed. Should the tasks need to be performed in a sequential order, appropriate personnel shall be instructed on the timing and order of tasks, stressing clear, concise communication throughout the process. Example - If a switchyard operator is required to open a breaker, he must have the proper switching order as a prerequisite and abide by TG East Wind Power's Lock-out/Tag-out process. It is important to identify adequate staff to complete the necessary tasks to ensure continuous operation of the generating facility, to the extent possible.

Task Identification:

For inverter-based resources, such as wind, storage, and solar facilities, the weatherization tasks may require less barriers and portable heaters than a conventional generation site; however, these measures can be utilized to keep exposed equipment above freezing temperatures or sheltered from precipitation where necessary.

Carefully list all tasks to be performed in Attachment B of the Emergency Operations Plan, as well as assigning the tasks to the appropriate personnel. It is important to note that severe conditions may warrant more resources to execute a task than normal operating conditions, so it is imperative that equipment like snow chains, de-icing solution(s), extra fuel, etc., are available. Attachment B will require an action item be assigned to personnel (listed by name), a description of the task, date, completion status (for tracking purposes), and any notes or comments taken during the drill.

Sample Tasks:

- Procurement and distribution of fuel for emergency generators, if applicable.
- Procurement and distribution of spare SF6, nitrogen, or oil for switchyard equipment.
- Management of transportation for personnel participating in the Drill.
- Establishment of emergency operations communications, cell phones, satellite phones, radios, etc.
- Communication of tasks and continual updates via the communication platforms used in the Drill.
- Erection of temporary barriers
- Procurement and placement of portable heaters and extra fuel.
- Inspection of plant and balance of plant equipment to ensure heaters (breaker panels, for example) and instrumentation are serviceable and properly insulated, where applicable.
- All necessary PPE is on hand and available for staff.
- Establish communication with ERCOT, QSE, and appropriate transmission entities, to keep them informed of any developing issues that may impact operation of the facility.
- Ensure proper equipment is on hand and available for clearing paths to the facility, should there be downed vegetation or obstructions.

Review and Correction:

In the event that vulnerabilities or issues were identified during the Drill, appropriate TG East Wind Power staff shall conduct a review of the Drill, corrective actions to be taken, and document those corrective actions in Attachment B. This review should include an extent of conditions assessment and root cause analysis in order to address any latent issues that may exist in other areas.

NAME
Akua Energy
Company Address

Telephone
Email

Public Utility Commission of Texas

PO Box 13326
Austin, TX 78711-3326

CC/BCC Block:

Enclosure:

Greetings:

This letter is to serve as notice to the Public Utility Commission of Texas that all of the TG East Wind Project relevant operating personnel are familiar with Akua Energy's Emergency Operations Plan (*AE-TGEWP-EOP-1*) and are familiar with their duties contained therein. TG East Wind Project's relevant operating staff, and its senior management are committed to following the Emergency Operations Plan, and to the extent that deviations are required, they must be appropriate for the operating conditions during the course of the emergency. Akua Energy's senior management has reviewed and approved the aforementioned Emergency Operations Plan and necessary drills have been or will be completed this current year, and this plan has been provided to necessary entities, to include ERCOT. The Emergency Operations Plan contains provisions to return the generating facility to normal operations, to the extent possible, during and after the emergency conditions. TG East Wind Project's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received training, which may include IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Feel free to contact me with any questions or concerns.

Sincerely,

NAME

Position
Akua Energy