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Pandemic & Epidemic Business Continuity Plan

Akuo Energy
TG East Wind Project, LLC

Version 1.0

Effective Date: 04/15/2022

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EXECUTIVE SUMMARY & APPROVAL

Introduction:

Considering recent responses to pandemics and epidemics, TG East Wind Power has developed this plan (PRP) to address the subject of business continuity, in the face of a widespread medical event, such as a pandemic or an epidemic. This Plan provides a framework, guidance, and concept of operations to support TG East Wind Power’s efforts to continue and/or rapidly restore critical business functions in the event of a disruption to normal operations. This plan includes an overview of continuity operations, outlines the approach for supporting TG East Wind Power’s critical business functions, and defines the roles and responsibilities of staff. It also outlines the orders of succession, notification procedures and communication methods, plan activation and deactivation protocols, provisions for alternate work locations, and the plan for maintaining and restoring access to vital records.

This plan establishes procedures and processes to maintain operational continuity for businesses based on the loss of services due to a reduction in workforce (e.g., during pandemic influenza).

The following individuals are responsible for maintaining, implementing, and revising the PRP.

Name	Title	Permission(s)

- provides a revision control summary that lists the dates of each change made to the PRP since the initial PRP adoption.

Version	Approval Date	Effective Date	Revision Summary
1.0	04/11/2022	04/15/2022	Initial Pandemic and Epidemic Response Plan

As of 04/15/2022, EOP Version 1.0, approved on 04/11/2022, supersedes all previous PRPs.

INTRODUCTION

Overview:

Continuity of Operations planning ensures TG East Wind Power is able to continue or quickly resume performing critical business functions, which are the functions that support the organization's mission, comply with legal requirements, and support life-safety, under all circumstances, to the extent possible. The benefit of this planning includes the ability to anticipate response actions following a pandemic or epidemic, improve the performance of its generating and operations facilities, and ensure timely recovery.

Plan Scope & Applicability:

The TG East Wind Power Pandemic Response Plan (PRP) is applicable once the safety of employees, customers, and guests has been verified. It can be active during normal business hours and after hours, with and without warning.

Plan Objectives:

The objective of the TG East Wind Power PRP is to facilitate the resumption of critical operations and functions in a timely and organized manner to ensure a viable and stable organization. In doing this it is critical to ensure the safety and well-being of employees, customers, and guests. The primary objectives of the plan are to:

- Maintain Critical Business Functions during the pandemic or epidemic
- Adjust business functions to address staffing issues
- Ensure employees are able to perform work remotely, where applicable and appropriate
- Protect vital records

Plan Assumptions:

The following assumptions were used while creating this plan:

- An event has occurred that affects normal business operations.
- Access to TG East Wind Power facilities may be limited.
- Qualified personnel are available to continue operations.

CRITICAL BUSINESS FUNCTIONS

Overview:

Critical business functions are those functions and critical activities that TG East Wind Power must maintain in a continuity situation, when there has been a disruption to normal operations, in order to sustain the mission of the organization, comply with legal requirements and support life-safety. They are the backbone of business and must be continued in order for TG East Wind Power to continue to meet its mission. These functions are not meant to be the name of a division, program, unit, etc. but meant to be the actual process/function that must be continued. These processes/functions can be supported or 'owned' by different divisions/units but the unit itself is not a critical business function. Each PRP will inevitably be different, with its own unique challenges posed by the pandemic/epidemic, therefore, the following sample bullets should be used to define business practices and operations during such periods:

- Function - Enter the specific function that may need to be resumed.
- Business Process to Complete - Write a high-level description of the function process. Include any specific forms or systems that may be needed. Supporting Activities

- Supporting activities - Those tasks performed to achieve a critical business function and should be described.
- Lead Point of Contact (POC) and Alternate - Identify and include contact information, if necessary, for staff POCs for each supporting activity.
- Vendors and External Contacts - Identify and include contact information, if necessary, for vendor POCs for each supporting activity.
- Vital Records - Vital Records are those records a business needs to sustain the mission of the organization and comply with legal requirements. Vital records must be stored in multiple places in multiple formats. The identification, protection, and ready availability of vital records needed to support essential functions are critical components of a successful PRP.
- Maximum Allowed Downtime - Identify the amount of time your business could afford for the function to be down before it could cause irreparable harm. Consider using the following units:
 - Less than 24 hours
 - 1 day to 1 week
 - 1 to 2 weeks
 - 2 to 4 weeks
 - 30 days or greater
- Criticality - Enter High, Medium, or Low depending on how critical the function is to the operations of your business. Following are some considerations to use when determining criticality:
 - What business objective/goal does this function support?
 - How often does this function occur?
 - How many business units (departments) or people perform this function?
 - Does the successful completion of this function depend on any other functions?
 - Are other functions dependent on this function for its successful completion?
 - Is there a potential for revenue loss if this function is not completed?
 - Is there a potential for fines, litigation, additional downtime, or other punishment for noncompliance due to a regulatory requirement (NERC or ISO)?
 - What priority ranking would you give this function as compared to other functions?

Required Resources:

- People: Identify the number of employees required for this function. Also identify if a staggered resumption of employees is an option.
- Equipment: Identify the type of equipment and how many would be required in order to get this function back in operation.
- Supplies: Identify any unique supplies required for this function (do not list items that could be easily purchased from an office supply store). This would include any paper forms or documents needed.
- Information Technology: Identify software (e.g., Microsoft Office, QuickBooks, etc.), systems, applications, and electronic documentation needed to complete the function.

- **Interdependencies:** List other business functions this function relies on to be operational.

Identification of Staff Required to Continue Business Operations:

In the event of a pandemic or epidemic, work absences, due to medical issues attributed to the widespread medical event, can lead to dramatic decreases in productivity, potentially leading to the shutdown of facilities. To maintain the best possible operational posture, it is imperative to communicate duties to the appropriate personnel, helping to ensure TG East Wind Power's facilities can remain operational to the greatest extent possible. In many cases, employees may log in remotely and perform their duties, fostering as much of an illness-free atmosphere possible, however, there will be the need for onsite staff to maintain and operate facilities, leading to the identification of mission essential staff and reporting structures. TG East Wind Power senior management will identify those mission essential individuals and will communicate tasks to them. As each case may differ, there will be no "One-size-fits-all" approach, and each response to a pandemic or epidemic will require its own set of responsible personnel and tasks. It is imperative that all possible measures are taken to keep TG East Wind Power staff from contracting or spreading the illness. Maintaining social distancing, where appropriate and possible, wearing proper PPE, and maintaining hygienic work and living spaces is crucial to combatting a widespread medical event. Depending on the nature of the event, the measures below may serve to facilitate the continued operations of TG East Wind Power facilities:

- **Wearing of PPE**
 - Masks (N-95 or similar)
 - Social distancing
 - Proper hygiene
 - Eye, face, or other protection (as applicable)
- Remote work, where appropriate and possible
- Encourage the use of approved medications and/or vaccine(s)

TG East Wind Power Company Critical Business Function				
Critical Business Function 1:				
Business Process To Complete:				
Supporting Elements				
Supporting Activities (Describe)	Lead POC	Vendors and External Contacts	Vital Records	Maximum Allowed Down Time
	Alternate			Criticality
Activity	Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days
	Position Title			High/Med/Low
Activity	Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days
	Position Title			High/Med/Low
Activity	Position Title	Brief list of vendors or external contacts to know for PRP purposes	Brief list of the vital records that support this activity	Time/Days
	Position Title			High/Med/Low
Implications if not Conducted: <i>Interruption and/or loss of this function would interrupt...Furthermore, it would result in a delay of the capability to...</i>				
Calendar Dependent: <i>(e.g., this function is always occurring, this function only occurs in summer months, this function is active during inclement winter weather, etc.)</i>				
Required Resources: <i>Staff, equipment, supplies, Information Technology, and other resources.</i>				
Facilities: <i>Standard office space that can accommodate up to X people at any time. Traditional office equipment and space for phones, computers, scanners, printers, etc., with network access to Internet, radio, and other telecommunications services.</i>				
Supporting Partners: <i>List private sector or public sector supporting partners.</i>				
Vital Records: <i>List relevant vital records and their location, if appropriate.</i>				

PLAN ACTIVATION PROCEDURES

Plan Activation During Normal Business Hours:

If it is determined that the facility cannot be re-inhabited, the Business Owner or designee will inform personnel on next steps. Employees may be instructed to go home to await further instructions or move to an alternate site. Further communications, such as instructions on where and when to report for work will be made using communication methods such as email, phone calls, texts, or other communication methods.

Plan Activation Outside Normal Business Hours:

If an event occurs outside normal business hours that renders a facility uninhabitable, the Business Owner or designee will activate the PRP using email, phone calls, texts, or other communication methods.

Actions upon Activation:

Upon activation of the PRP, the Business Owner or designee will be responsible for notifying all affected personnel of their duties and where they will be performing those duties (remotely or at a site).

ORDERS OF SUCCESSION AND DELEGATIONS OF AUTHORITY

Overview:

Orders of succession are prepared to provide clarity of senior leadership roles in the event that individuals in these roles, whether they be decision-making or management roles, are unavailable due to effects of a pandemic or epidemic. A delegation of authority provides successors with the legal authorization to act on behalf of critical positions within the organization for specific purposes and duties.

Orders of Succession:

These orders of succession are a formal and sequential list of senior leadership positions, written by position and not name, to identify who is authorized to assume the role of a position, should the incumbent be unavailable. The term unavailable means the incumbent of a position is not able, because of absence, disability, incapacity, or other causes, to exercise the powers and duties of an office. Pre-identifying orders of succession is critical to ensuring the continuation of effective leadership during an incident that disrupts operations.

Delegations of Authority:

Delegations of authority are the legal authorization to act on behalf of critical positions within the organization for specific purposes and duties. In order to ensure the rapid response to any situation requiring the activation of a PRP employees who serve in key senior leader positions must develop and maintain pre-delegated authorities for policy determinations and decisions, as needed. The delegations

of authority should include what type of authority is being delegated, such as signatory or credit card authorization for purchasing, and also limitations of the delegated authority. All duties of each senior leader are delegated to the position in the orders of succession when the incumbent cannot fulfil that authority for any reason, including but not limited to:

- Absence
- Illness
- Leave
- Death

Each authority is also terminated when the incumbent returns. The importance of previously delegated authorities is to ensure that important functions or authority can continue should the primary position become unavailable to complete their given functions. Staff who hold critical positions must maintain the pre-delegated authorities through effective cross-training and exercises for their successors.

How to Complete the Delegation Table (Table 2)

This table is customizable and has no limit to how much information should be in them. Please copy/paste to create a table for each position that must be continually occupied.

Position to be succeeded - This should be the title of the position that will need to be filled in the event a staff member becomes unavailable.

Successors - This should be the title of the position, not an individual, that will need to fill the position identified in the first column. They should be listed in sequential order.

Delegated authorities - These are the task and responsibilities held by the position delineated in the first column.

Activation and termination triggers - Select from incapacitated, unavailable, or selective decision as a reason for activation, per each position. Termination can be identified as sample language suggests or alternations can be made to termination thresholds.

Position to be Succeeded	Successors	Delegated Authorities	Activation and Termination Triggers
Department Lead	<i>Successor 1</i>	<i>Delegated authorities or all duties as assigned</i>	<u>Activate:</u> <i>Incapacitated, unavailable, or selective decision</i> <u>Terminate:</u> <i>Return of Director</i>
	<i>Successor 2</i>	<i>Delegated authorities or all duties as assigned</i>	<u>Activate:</u> <i>Incapacitated, unavailable, or selective decision</i> <u>Terminate:</u> <i>Return of Director</i>
	<i>Successor 3</i>	<i>Delegated authorities or all duties as assigned</i>	<u>Activate:</u> <i>Incapacitated, unavailable, or selective decision</i> <u>Terminate:</u> <i>Return of Director</i>

PLAN DEACTIVATION

Overview:

PRP deactivation is the process of demobilizing the alternate facility and restoring critical business functions to the primary facility or a new facility that will permanently replace the damaged facility. Plan deactivation may not consist of an exact replacement of lost facilities, equipment or processes. The goal of plan deactivation is to reestablish full capability in the most efficient manner. In some continuity incidents, extensive coordination may be necessary to backfill staff, procure a new operating facility, and re-establish vital records. When it is determined the PRP activation has ended, all personnel should be informed that the necessity for continuity operations no longer exists and the return to normal operations will begin.

Criteria for PRP Deactivation:

The business owner or designee will determine, based on input from medical authorities, staff, or other entities when it is safe and when the organization is prepared to restore or transfer critical business functions to a facility for long term usage. Critical business functions must be restored in priority sequence based upon the classification and criticality of the function. The following elements are typically completed prior to plan deactivation.

- Purchase and acquire equipment, supplies and travel arrangements needed for the resumption effort.
- Temporarily suspend non-critical functions, as necessary, to support the resumption efforts.

- As applicable, utilize other personnel, such as contract personnel, to support the resumption efforts.

Resumption Process:

Provide information as to how each function outlined in table 3 will be resumed and which staff members need to be active participants in this process.

How To Complete The Plan Deactivation Table - The following information details how to complete elements of Table 3 below. When completing this table, minimize the use of acronyms and describe actions in plain terms so that staff members who may be unfamiliar with the function will be able to use the document to resume and sustain the critical business function, if necessary.

Table 3

Item	Function	Supplies	Required Resources
1			
2			
3			
4			

Employee Contact List:**Table 4**

Employee Name	Title/Responsibilities	Phone Number	Personal Email Address

Vendor Contact List:



Annex F - AE-TGEWP-EOP-001-Pandemic Response Plan
Table 5

Vendor	Resource/Service	Phone Number	Email Address

ERCOT Nodal Protocols

Section 22

Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations

May 1, 2020

Declaration of Completion of Generation Resource Winter Weatherization Preparations

Winter Peak Load Season: December 20__ through February 20__

Resource Entity (or Entities): Resource Entity (or Entities)

This declaration applies to the following Generation Resources (list by Resource Site Code):

Generation Resource(s)

I hereby attest that all weatherization preparations for equipment critical to the reliable operation of each of the above-listed Generation Resources during the time period stated above are complete or will be completed, as required by the weatherization plan applicable to each Generation Resource. Any outstanding weatherization preparations are summarized in the attached document and include the name of the Generation Resource, a brief description of the remaining weatherization task(s) if any, and an associated target completion date for each task.

By signing below, I certify that I am an officer or authorized executive of each Resource Entity listed above, that I am authorized to execute and submit this declaration on behalf of each Resource Entity listed above, and that, to the best of my knowledge, the statements contained herein are true and correct.

Signature

Name

Title

Date

Annex L - Hurricane Response Plan

Akuo Energy

TG East Wind Power, LLC

Version 1.0

Effective Date: 04/15/2022



In the event of a hurricane, the first priority is always the health and safety of TG EAST WIND POWER personnel. TG EAST WIND POWER’s hurricane response process is listed below:

- Ensure all TG EAST WIND POWER personnel and any potentially affected public personnel are not in danger.
- By using the evacuation routes in the link below, TG EAST WIND POWER personnel must evacuate at a time recommended by local authorities.
- TG EAST WIND POWER facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
 - Ensure all loose material or equipment is secured.
 - Ensure proper draining channels exist and are functional

TG EAST WIND POWER facilities in Region 1, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

TG EAST WIND POWER facilities in Region 2, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

TG EAST WIND POWER facilities in Region 3, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

TG EAST WIND POWER facilities in Region 4, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

TG EAST WIND POWER facilities in Region 5, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

TG EAST WIND POWER facilities in Region 6, as specified by TDEM, shall use the hurricane evacuation routes published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

TG EAST WIND POWER shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.

For re-entry to TG EAST WIND POWER’s facility, the route should be surveyed, to the extent possible, to gauge accessibility. Should accessibility be obstructed, pre-identified equipment, such as chain saws, tire chains, or other emergency equipment must be on hand and available to clear a path, should the need present itself. At all times, proper PPE must be worn and communication between designated TG EAST WIND POWER staff and leadership must be maintained.