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Panda Sherman Power, LLC
an affiliate of Panda Power Funds

April 14, 2022

Public Utilities Commission of Texas
1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711-3326

Subject: Removal of EOP from docket 40932

This letter is to request the removal of the Panda Sherman Power, LLC. EOP inadvertently submitted under docket 40932. Panda Sherman Power, LLC. will refile it's EOP under docket 53385.

If you should have any questions or comments pertaining to this letter, please contact Joseph Malinowski at your earliest convenience. jmalinowski@pandashermantx.com 903-487-5812

Sincerely,

Joseph Malinowski
Plant Engineer
Panda Sherman Power, LLC

Panda Sherman Power, LLC	Emergency Operations Plan	
Number: **EOP**	Subject: **Executive Summary**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date:

Affidavit

STATE OF Texas §

COUNTY OF Dallas §

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on their oath that they are entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

I swear or affirm that the attached report was prepared under my direction, and that I have the authority to submit this report on behalf of the reporting party. I further swear or affirm that all statements made in the report are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner.

Signature of Authorized Representative

Robert W. Carter

Printed Name

Panda Sherman Power, LLC

Name of Reporting Party

Sworn and subscribed before me this 11th day of April, 2022

Paula Robinson
My Commission Expires
8/19/2025
Notary ID
3895813

Paula Robinson

Panda Sherman Power LLC	Emergency Operations Plan	
Number: EOP	Subject: Executive Summary	
Approved for Use by:	Current Issue: REV 0	Issue Date: 04/09/22

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EOP SECTIONS

1. Purpose

Panda Sherman Power LLC has developed this Emergency Operations Plan in accordance with TAC Rule §25.53 Electric Service Emergency Operations Plans, describing the actions to be taken by the organization in response to emergency scenarios outlined by this plan. This Emergency Operations Plan and its associated subsections will be used in conjunction with other plant specific procedures when responding to these emergencies. It also sets forth the specific actions to be taken by Plant Staff and support personnel during a power plant emergency.

2. Summary of Roles and Responsibilities

2.1. General Manager

The Panda Sherman Power General Manager is the designated Site Emergency Manager (SEM), with responsibility to provide the necessary authority to commit the appropriate resources to accommodate and follow the Emergency Operations Plan. The General Manager is the designated Panda Sherman Power representative who will interact with local, state, and federal emergency management officials during emergency events. Other qualified individuals may be designated to act as the SEM in the absence of the General Manager as outlined herein.

2.2. Operations Manager, Maintenance Manager, Plant Engineer

The Operations Manager will serve as the primary back-up to the General Manager to perform the duties of the SEM in the event the General Manager is unavailable.

The Operations Manager, Maintenance Manager and Plant Engineer will support the active SEM in respond to the events outlined in the Emergency Operations Plan.

The Plant Engineer is responsible for maintaining and updating this procedure and will coordinate the necessary training and drills in accordance with the plan.

2.3. Operations Shift Supervisors, Control Room Operators

The Shift Supervisor on duty will be designated as the SEM in the absence of Plant Management. If the Shift Supervisor on duty is unable to perform the duties of the SEM the Control Room Operator will act on their behalf until a Shift Supervisor or a member of the Plant Management Team properly relieves them of their duties of the SEM.

2.4. All Panda Sherman Power Employees

All employees are responsible for gaining an understanding of this procedure by attending training and drills as required. All employees are expected to support response activities for the events outlined under the Emergency Operations Plan as directed by the Panda Sherman Power SEM.

3. Organization

3.1. Panda Sherman Power Site Emergency Manager (SEM)

Panda Sherman Power shall have a person designated as the Site Emergency Manager (SEM) who will immediately take charge and direct the immediate responses required for any emergency outlined by the Emergency Operations Plan. The on-duty SEM will make the necessary notifications to the Plant Management Team if not present at the time of the event. The Plant General Manager or designee will notify the Panda Power Funds Corporate Leadership Team of the ongoing or developing concern and will coordinate with the Corporate Leadership Team regarding the appropriate response actions.

3.2. Panda Power Funds Corporate Leadership Team

The Corporate Leadership Team will support the Site Emergency Manager as required to facilitate the appropriate response to emergencies outline by the Emergency Operations Plan. The Panda Power Funds Chief Executive Officer will be the primary point of contact to the Panda Sherman Power SEM and will solicit and direct other members of the Corporate Leadership Team as appropriate to support the Site Emergency Manager.

The Corporate Leadership Team under the direction of the Chief Executive Officer will manage all communications with outside entities including the news media and public notifications or inquiries. The Chief Executive Officer or his designee will be the primary spokesperson for Panda Power Funds regarding external communications related to incidents outlined in the Emergency Operations Plan.

4. Panda Sherman Power Facility Location

4.1. Panda Sherman Power, LLC; 510 Progress Drive Sherman, Texas 75092

4.2. Latitude: N 31.0586º Longitude: W 97.3167º

5. Events/Activation

5.1. Emergency Operations Plan Applicability

This Emergency Operations Plan applies to the Panda Sherman Power LLC facility located at the address of 510 Progress Drive, Sherman TX 75092 and includes any associated ancillary facilities owned by the project.

5.2. Activation of the Emergency Operations Plan

The Panda Sherman Power Site Emergency Manager or active designated SEM is responsible for activating the EOP and determining what actions to take immediately following the occurrence of the events outlined in the Emergency Operations Plan. When appropriate, the Panda Sherman Power SEM will make notification to the Panda Power Funds Corporate Support Team in accordance with the guidance contained in this Emergency Operations Plan. The Panda Power Funds Chief Executive Officer is responsible for determining the appropriate degree of overall corporate response required and implementing those appropriate actions.

The following are events included in the scope of the Emergency Operations Plan. The degree of response under the EOP will be determined by the severity of the event, potential consequences, and impact to the facility.

5.3. Events

5.3.1 Weather
5.3.2 Hurricanes
5.3.3 Restoration of Services
5.3.4 Pandemic
5.3.5 Cyber Security Incident
5.3.6 Physical Security Incident
5.3.7 Water Shortage Incident

5.4. Emergency Operations Plan Immediate Actions

5.4.1 The following priorities are to be considered by the Panda Sherman Power SEM in response to events outlined in the Emergency Operations Plan.

5.4.1.1	Personnel Safety.
5.4.1.2	Initiate local Emergency Response (911) as appropriate. (EMS, Fire and Police)
5.4.1.3	Environmental and Facility Equipment Protection.
5.4.1.4	Communicate facility status to Qualified Scheduling Entity (QSE) as appropriate.
5.4.1.5	Notification to Plant Management Team and Panda Power Funds Senior Management
5.4.1.6	Minimize impact to facility restoration and operations.

Copies of this Panda Sherman Power Emergency Operations Plan have been copied to the following internal and external entities:

Panda Sherman Power Plant Management Team
Panda Power Funds Corporate Leadership Team
Public Utility Commission of Texas (PUCT)
Electric Reliability Council of Texas (ERCOT)

6. Affidavit

STATE OF _____§

COUNTY OF _____§

BEFORE ME, the undersigned authority, on this day personally appeared the undersigned, who, after being duly sworn, stated on their oath that they are entitled to make this Affidavit, and that the statements contained below and in the foregoing are true and correct.

I swear or affirm that the attached report was prepared under my direction, and that I have the authority to submit this report on behalf of the reporting party. I further swear or affirm that all statements made in the report are true, correct and complete and that any substantial changes in such information will be provided to the Public Utility Commission of Texas in a timely manner.

_____

Signature of Authorized Representative

_____

Printed Name

_____

Name of Reporting Party

Sworn and subscribed before me this _____ day of _____, _____.

Month Year

_____

Notary Public in and for the State of _____

7. Record of Distribution

Name	Job Title	Date of Access / Training
John Alm	Auxiliary Plant Operator	4/9/2022
Don Brooks	Shift Supervisor	4/9/2022
John Copus	Maintenance Manager	4/9/2022
Nick Deroy	Control Room Operator	4/9/2022
Bennett Dryden	Control Room Operator	4/9/2022
Blake Easterwood	Maintenance Mechanic	4/9/2022
Jesse Edge	Control Room Operator	4/9/2022
Kabul Glaze	Maintenance Planner	4/9/2022
Rejeanna Grady	Administrative Clerk	4/9/2022
Teddy Hunt	Auxiliary Plant Operator	4/9/2022
Montie Jenkins	Control Room Operator	4/9/2022
Terri Little	Administrative Manager	4/9/2022
Joe Malinowski	Plant Engineer	4/9/2022
Dwight Matthews	Control Room Operator	4/9/2022
Mike Menke	Maintenance Planner	4/9/2022
John Miller	IC&E Technician	4/9/2022
Darryl Nitschke	General Manager	4/9/2022
Alex O'Brien	Operations Manager	4/9/2022
Tanner Payne	Auxiliary Plant Operator	4/9/2022
Leighton Peters	Auxiliary Plant Operator	4/9/2022
Nick Pollard	Maintenance Mechanic	4/9/2022
Beau Redabaugh	IC&E Technician	4/9/2022
Robert Simpson	Shift Supervisor	4/9/2022
Tim Tatman	Auxiliary Plant Operator	4/9/2022
Shane Toftee	Shift Supervisor	4/9/2022

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 1**	Subject: **Emergency Response Overview**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. Emergency Response Protocol

1.1. If an Emergency Operations Plan event occurs the following response organization shall be implemented:

	Initial	Subsequent (If required)
Emergency Coordinator	Shift Supervisor/ Control Room Operator	Site Emergency Manager (SEM)
Communications	Shift Supervisor/ Control Room Operator	Operations Manager (or their designee)

1.2. Typical Operations Shift staffing consists of (1) Shift Supervisor, (1) Control Room Operator, (1) Auxiliary Operator. The SEM and Plant Management Team will evaluate any immediate impacts to the facility and add additional in-house and/or contract staffing as required for event response.

1.3. The Shift Supervisor is responsible for initiating the immediate response actions, for observing overall plant operations, and ensuring the plant remains in a safe condition. If the Shift Supervisor is unable to initiate the immediate response, the Control Room Operator will act on behalf of the Shift Supervisor until a Shift Supervisor or SEM is available to relieve them.

1.4. During an emergency event, the Shift Supervisor assumes the duties as the SEM (Site Emergency Manager) until relieved by a member of the Plant Management Team.

1.5. The Shift Supervisor or designee shall:

1.5.1 Take the necessary actions to stabilize plant operation if affected.
1.5.2 Evaluate operational & physical impact to the facility.
1.5.3 Request Emergency services if required.
1.5.4 Notify Plant Operations Manager & Plant Management Team.
1.5.5 Take the necessary corrective action to restore systems if Plant Operations have been impacted by the event.

1.6. General Response

1.6.1 Refer to specific applicable Emergency Operations Plan sections to guide emergency response actions.

1.6.2 Notify site personnel of plant event and any Safety concerns that may exist.

1.6.3 Control Room initiates phone calls for necessary off-site notification.

1.6.4 All other on-site personnel will monitor radio communications and support the appropriate response as directed by the SEM.

1.7. Emergency Response Plan Staffing Plan

1.7.1 The Panda Sherman Power SEM will evaluate the staffing needs of the Emergency Event and will determine the appropriate staffing levels needed to manage the event response. This could include the following as necessary:

Notifying additional Panda Sherman Management Staff and Employees to respond to the site to support the event response.

Procuring Contracted Support Companies to support the plant led event response with additional manpower and/or equipment as required.

1.8. Emergency Response Supplies

1.8.1 Panda Sherman maintains an inventory of supplies for response to extreme hot and cold weather events, spill response, and expected consumable items to support O&M personnel needs. Weatherization supplies are inventoried prior to the winter season. Panda Sherman maintains an inventory of spare parts and consumables to support maintenance and replacement of critical plant equipment to minimize the impact to plant availability.

1.9. Recovery

1.9.1 Upon conclusion of an Emergency Event Response the SEM and Plant Management staff will give the approval and direction to restore plant systems as necessary and restore generation capability as allowed through communication will the Qualified Scheduling Entity. Refer to Section 5 of this EOP for plant recovery and restoration protocol.

2. Communications Plan

2.1 Upon activation of the EOP due to an event covered under this plan the active SEM will notify the Plant Management Team if not on site at the time of event. The typical chain of command would be notification to the Plant Operations Manager followed by the Operations Manager notification to the Plant General Manager. The General Manager or his designee will make notification to the Panda Power Funds Chief Executive Officer or his alternate of the pending or active event as appropriate based on the type and severity of the event. The SEM will communicate and coordinate response actions with local response agencies, officials and emergency operations centers as appropriate for the event circumstances.

2.2 The Panda Power Funds Corporate Leadership Team under the direction of the Chief Executive Officer will manage all communications with outside regulatory entities as appropriate including the news media and public inquiries. The Chief Executive Officer or his designee will be the primary spokesperson for Panda Power Funds regarding external communications related to incidents outlined in the Emergency Operations Plan. Immediate Media inquiries at the plant location will be directed to the Plant General Manager or his designee as appropriate and will communicate these inquiries to the Corporate Leadership Team as appropriate.

2.3 The active SEM at the onset of the event or his designee (Control Room Operator) will make the appropriate communications to ERCOT via the Panda Sherman Power designated Qualified Scheduling Entity and/or ONCOR (Transmission Operator) if plant status has been immediately impacted by the event.

2.4 Any written communications in response to inquiries from any outside entities should be routed and reviewed by the appropriate members of the Corporate Leadership Team.

2.5 General plant staff shall not respond to outside inquiries related to any events covered under this Emergency Operations Plan.

Panda Sherman Power LLC	Emergency Operations Plan	
Number: Section 2	Subject: Emergency Contacts	
Approved for Use by:	Current Issue: REV 0	Issue Date: 04/09/22

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1. Emergency Contact Phone Numbers

Contact	Phone Number
General Manager (Darryl Nitschke) Primary SEM	936-524-6497
Operations Manager (Alex O'Brien) Back-up SEM	732-979-3696
Maintenance Manager (John Copus)	601-708-3226
Plant Engineer (Joe Malinowski)	757-879-4538
Panda Power Funds; CEO, President, CFO (Michael Trentel) Primary Corporate Point of Contact	214-533-5476
Panda Power Funds; Director Commercial Ops Back-up Corporate Point of Contact	903-279-7674

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 3**	Subject: **Weather Emergency**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. Introduction

1.1. The Sherman plant utilizes AccuWeather's SkyGuard Warning System:

AccuWeather Portal – https://enterpriseportal-v2.accuweather.com/ Username: pandashermancr@pandashermantx.com Password: panda1 AccuWeather Phone: 316.266.8000

1.2. When the plant receives an Accuweather Tornado Alert, via email or website prompt, all steps applicable to this procedure are to be entered in the plant Control Room applicable logbook by the on-shift Control Room Operator.

2. Lightning

2.1. The Control Room Operator will monitor AccuWeather radar for lightning strikes and be cognizant of site observations.

2.2. If a lightning strike is observed within a 10-mile radius, the following shall occur:

2.2.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. Lightning has been observed within 10 miles of the plant. All upper level elevated work activities are suspended. Please return to ground level."

2.2.2 Repeat the announcement above.

2.2.3 All elevated work will be stopped in the following areas:

2.2.3.1 Top of the HRSGs
2.2.3.2 Steam turbine and pipe rack upper levels
2.2.3.3 CTG inlet filter houses
2.2.3.4 Top of the cooling tower
2.2.3.5 Brine concentrator and crystallizer elevated platforms

2.3. If a lightning strike is observed within a 6-mile radius, the following shall occur:

2.3.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. Lightning has been observed within 6 miles of the plant. All non-essential outdoor work activities are suspended."

2.3.2 Repeat the announcement above.

2.3.3 Site management and/or the Shift Supervisor will determine which activities will be considered essential to plant operations and will be allowed under these conditions.

2.4. When no lightning strikes are indicated on AccuWeather radar within 6 miles for at least 10 minutes:

2.4.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. No lightning strikes have been observed within 6 miles for 10 minutes. Non-essential outdoor work activities are now permitted. All upper level elevated work activities remain suspended until further notice."

2.5. When no lightning strikes are indicated on AccuWeather radar within 10 miles for at least 20 minutes:

2.5.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. No lightning strikes have been observed within 10 miles for 20 minutes. All outdoor work activities are now permitted without restrictions."

2.6. Monitoring may be discontinued once all AccuWeather lightning warnings have been terminated or expired and no further threats are expected.

3. Tornados

3.1. If an AccuWeather Tornado Watch is issued for the plant, the following will be performed:

3.1.1 The Control Room Operator will make the following radio announcement:

"Attention in the plant. Attention in the plant. A Tornado Watch has been issued for the area. All site personnel are instructed to proceed immediately to ground level. Ground level work is permitted but is limited to storm preparation and basic maintenance activities."

3.1.2 Repeat the announcement above.

3.1.3 Any personnel, contractors, and visitors working above the ground floor will proceed immediately to the ground level.

3.1.4 Once personnel are at ground level, they will begin readiness work for a potential storm.

3.2. If an AccuWeather Tornado Warning is issued for the plant, the following will be performed:

3.2.1 The Control Room Operator will make the following radio announcement:

> "Attention in the plant. Attention in the plant. A Tornado Warning has been issued for the area. All site personnel are instructed to secure all portable equipment and proceed immediately to a safe area. Close all windows, blinds, and doors and await further instructions."

3.2.2 Repeat the announcement above.

3.2.3 All personnel, contractors, and visitors will secure portable equipment and proceed to a safe area. All personnel, contractors, and visitors must be mustered and accounted for.

3.2.4 All personnel will ensure building windows are closed and shades fully lowered.

3.2.5 Plant operators will ensure all plant building doors are fully shut.

3.2.6 The Shift Supervisor or Control Room Operator shall notify the General Manager and the Qualified Scheduling Entity (QSE) that a Tornado Warning has been issued for the site and proceed with actions as directed by those sources.

3.3. If a tornado is spotted by plant personnel or the site receives notification that a tornado converging on the site is likely, the following will be performed:

3.3.1 The Control Room Operator will make the following radio announcement:

> "Attention in the plant. Attention in the plant. A tornado is approaching the site. Take cover immediately. The control room is being evacuated."

3.3.2 Repeat the announcement above.

3.3.3 Leave the plant in its current configuration.

3.3.4 Operations personnel will collect the control room radio and cell phone and proceed immediately to the storm shelter area.

3.3.5 The Shift Supervisor will notify the Qualified Scheduling Entity (QSE) that the control room has been evacuated and provide an update on the configuration of the plant.

3.3.6 No personnel shall leave the shelter areas without full authorization by the Site Emergency Manager (SEM).

3.4. Once the storm has cleared, the following will be performed:

3.4.1 The SEM will notify all personnel, contractors, and visitors that it is safe to leave shelter. It may be necessary to perform this action at each shelter if radios are unavailable or if site conditions warrant individual area assessments first.

3.4.2 A muster shall be performed to account for all site personnel. Any missing personnel must be located. Medical emergencies shall be handled in accordance with ICP-04.

3.4.3 Plant personnel will survey the site to assess plant damage, exercising extreme caution while navigating the area. Verbal updates will be provided to the SEM as conditions are evaluated.

3.4.4 Any damage found will be documented and evaluated prior to return to service. Spills, fires, and pond damage shall be addressed in accordance with their respective ICPs.

3.4.5 The Shift Supervisor shall update the General Manager (if not on site) and the Qualified Scheduling Entity (QSE) on plant status and site condition.

3.4.6 The General Manager shall update the Panda Power Funds Corporate Leadership Team on plant status and site condition as appropriate.

3.4.7 The SEM will coordinate all subsequent activities. Plant cleanup efforts and system restoration shall be performed in accordance with plant procedures as experience and system evaluation dictates.

4. Winter Storms

4.1. If forecasted temperatures are expected to be <20° F at any point, or forecasted to be below freezing for >24 hours, the Plant Management Team will discuss and determine additional plant staffing to support cold weather operations. This additional staffing could include additional ICE, Maintenance, and Operations support personnel as well as contract personnel if necessary.

4.2. For long duration forecasted winter events, evaluate the necessity of on site or local housing and food accommodations for plant staffing. Make arrangements as necessary.

4.3. Evaluations should be made to determine if additional winterization efforts should be implemented based on forecasted elements associated with event. Evaluations at a minimum should include:

4.3.1 Insulation and lagging integrity

4.3.2 Water leaking from system piping or lagging

4.3.3 Verify all instrument sensing lines are adequately covered with insulation and heat tracing

4.3.4 Determine if additional temporary or permanent wind breaks are required to protect critical equipment or instrumentation from forecasted elements.

4.4. Supplies utilized in response to an event should be staged in strategic locations to expedite response times from personnel should and adverse condition exist during a cold weather event.

4.5. Electrical heat trace should be verified to be in proper working order prior to event.

4.6. During snow and ice storms, pay close attention to snow and ice accumulation around equipment, doorways, and on buildings and tanks. Consider blocking pathways in areas where ice mitigation is not practical or feasible.

4.7. Evaluate plant walkways for ice accumulation. Remove as necessary for access to plant areas. If icing is forecasted, consider pre-salting walkways and roadways where feasible.

4.8. Shift inspections conducted in accordance with OP-606A Tables 8 and 9. Tables 8 and 9 are intended to be utilized on a daily basis and can span two shifts as weather conditions permit.

4.9. A DCS screen has been created for monitoring the critical transmitters listed on OP-606A Table 10. This page must be monitored continuously whenever weather conditions warrant inspections in accordance with OP-606ATable 8.

4.10. Document any issues observed during the course of the season on OP-606A Lessons Learned for retention and remediation.

5. Heavy Winds

5.1. During periods of heavy winds, caution should be exercised while outside. If storms are in the immediate area of the plant, outside activities should be curtailed as much as possible. Personnel shall avoid being in the highest elevation on any structure.

5.2. Ensure no loose materials are left exposed in the plant.

5.3. Place overhead cranes in the storage position and lock in place.

5.4. During periods of high winds, it will be necessary to monitor the cooling tower. If it is safe to do so, visually inspect the basin for debris accumulation. Monitor circulating water pump discharge pressures.

6. Flooding

6.1. The site should be monitored for rising water.

6.2. No personnel should enter or cross a suspected high water level area.

6.3. Any equipment exposed to rising water shall be shut down prior water immersion. Notify plant management if equipment shutdown will necessitate plant shutdown.

6.4. All personnel shall proceed to high ground and stay out of the flood waters.

7. Extreme Heat

7.1. This extreme heat plan should be used in conjunction with the appropriate sections

and tables of OP-606B Summer Readiness Plan when responding to an extreme heat event.

7.2. Prior to extreme heat event, building HVAC inspections shall confirm proper operation of all temperature control units. This includes continuity checks and temperature controller verifications as applicable.

7.3. Evaluations of critical equipment should be made to determine if additional measures can or should be taken to minimize effects of extreme heat. (i.e. additional sunshades)

7.4. Temporary cooling equipment should be staged in convenient locations to expedite the response to an extreme heat condition. (i.e. air horns, vortex coolers, portable AC units)

7.5. Evaluations should be made to determine if additional staffing resources are needed during the extreme heat event.

7.6. All maintenance activities will be evaluated to determine potential risks to operability during extreme heat conditions and will be deferred to off peak hours or following the extreme heat incident if warranted and depending on the severity of the event, all maintenance activities may be limited to emergent work only.

7.7. Screen equipment deficiencies for potential impact and prioritize their resolution as required to ensure reliable operation during extreme heat event.

7.8. Monitor plant operations during extreme heat event to identify weaknesses. Document items that were affected by extreme heat conditions and create work orders for resolution.

7.9. Document noted deficiencies in OP-606B Summer Readiness Lessons Learned.

8. Drought

8.1. Monitor Lake Texoma Lake Levels. If lake levels drop significantly discuss pumping capabilities with the City of Sherman to determine if raw water pumps are expected to be impacted. Monitor City of Sherman raw water flows to the raw water pond.

8.2. Maintain regular communication with the City of Sherman regarding seasonal raw water deliveries.

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 4**	Subject: **Hurricane**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

1. Hurricane Procedures

1.1 The Panda Sherman Power LLC facility is located in Grayson County, TX. and, is not located in a designated evacuation zone as outlined by the Texas Division of Emergency Management. Based on this location, an Emergency Operations Plan Section pertaining to Hurricane Response is not applicable to this facility.

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 5**	Subject: **Restoration of Service**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

1. Priorities for Recovery of Generation Capacity

The Panda Sherman Power LLC facility is registered as a Generation Resource.

If the Generation Resource has experienced a reduction of generating capability due to a "Failed Start" or "Generator Trip" attributable to a Hazard or Threat, an investigation will be initiated to determine the direct cause of the failure. An assessment will be completed to determine if the initiating Hazard or Threat can be mitigated or eliminated to allow a return to service without further risk to plant equipment and capability.

During this investigation and recovery phase the Operations Team will provide updates to ERCOT through the Qualified Scheduling Entity on assessment findings and estimated return to service.

The Plant Management team will initiate the appropriate response actions to perform any necessary corrective actions to restore generation capability of the plant.

Once the threat or hazard that caused impact to the generating capability of the plant has passed or has been mitigated to reduce the risk to reliable operation of the facility, the SEM and the Plant Management Staff will determine if any corrective action is necessary. Once any required corrective actions have been completed the Plant Management Team will request a return to service via the Qualified Scheduling Entity and attempt to restore the full generation capability of the facility.

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 6**	Subject: **Pandemic**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. PANDEMIC PREPAREDNESS AND ACTION PLAN

A list of personnel required for pandemic duty will be obtained and posted at the issuance of Phase 1 of the Pandemic Plan.

Sherman Power will attempt to provide ample notification of sequestering to the Pandemic crew. Operations personnel that are currently working at the time of sequestering will stay on shift until properly relieved by the sequester crew. If there are not enough sequester members, the Operation technicians scheduled to work the shifts will be expected to stay through the Pandemic lock down operation.

2. PURPOSE

This Pandemic Operations Plan, (POP), has been developed to assure that the Sherman Power Plant and its employees are prepared in the event a Pandemic condition should threaten Grayson County.

This procedure provides information and outlines steps to protect personnel and is a guideline to follow rather than a set of rigid rules.

For better preparedness and smooth transitions in case of the threat of a Pandemic this POP has been divided into three phases of readiness.

- **Three Stages of Preparation:**

- **Stage 1:** Pandemic threat – prepare for subsequent stages
- **Stage 2:** Threat of infection elevated – essential personnel only at the plant
- **Stage 3:** Facility Lock Down Crews in place

2.1. Plan Elements for Stage 1

- Provide employees with the most up-to-date information available about the pandemic. Examples of information that should be provided are:
  - Mechanism(s), speed, and ease of transmission by which the contagion is spread, and mode(s) of transmission, such as touch, airborne, etc.
  - Time the contagion remains active on surfaces, such as door handles.
  - Incubation period, time to exhibit symptoms, and maximum contagious period.
  - Expectations of employees, supervisors, and managers to help reduce the risk of spreading the disease.

- Confirm VPN access for plant management, warehouse and other personnel who need remote access to work at home.

- Determine what personal protective equipment will be effective and consider acquiring sufficient quantities (masks, gloves, and gowns). Availability of critical personal protective equipment may approach zero during the onset on an influenza pandemic. Some masks deliver better speech clarity than others. Some masks are designed to protect the person wearing the mask; other masks protect exposure of others from the person wearing the mask.

- Purchase Clorox wipes, hand sanitizer and other disinfectants and implement a program to ensure that telephones, counters, doorknobs and other control handles are regularly disinfected.

- Provide each workstation with a disinfecting agent in a spray bottle, a package of paper towels, and a package of latex/vinyl gloves.

- Determine the need for a cleaning crew to increase provided service visit frequency.

- Ensure adequate food and sleeping accommodations in the plant to cover a Stage 3 event:
  - One week supply for Stage 3 Personnel of heat-and-eat meals, bottled water, breads, sodas, chips, etc. (Note that there will be two crews of operators and

three maintenance techs (2 IC&E and 1 MM).

- Cots, air mattresses, blankets, pillows, linens, etc.

- Panda Sherman Power Management will identify functions critical to continued operations.
  - Develop lists of Essential Personnel (aka those who will report to the plant under Stage 2) and Stage 3 Personnel (those who will be part of a Facility Lock down Crew).

- Management will develop/update staff travel policy, including possible provisions for quarantine after returning from an area where an outbreak has occurred. This would apply to work and non-work related travel.

- Implement a process such that all employees/visitors are subject to an appropriate screening questionnaire to aid in identifying whether or not they are a potential risk (i.e., have you visited a high-risk location in the past week?). Appendix 2 is a template of a possible questionnaire. Send questionnaire to Legal for approval.

- Management will develop/update policies for employee compensation and sick-leave absences unique to a pandemic.

- Verify contact information is up-to-date for all plant personnel.

- Only perform maintenance required to keep the plant operational.

  - Minimize contractor access to those absolutely necessary to the continued operation of the facility. Notify non-essential contractors that their service will be discontinued until further notice.

  - Monitor any personnel on site for flu-like symptoms, and request anyone exhibiting such symptoms to leave the site immediately.

2.2. Plan Elements for Stage 2

- A Stage 2 declaration is at the discretion of the Plant Manager or an officer of Panda Power Funds.

  - An Event Notification Level 2 should be sent immediately upon the decision to elevate to Stage 2

- Direct that only Essential Personnel should be at the site and assign work to those that can work from home.
- Continue wipe-downs of phones, doorknobs, counters and controls.
- Continue to closely monitor any personnel on site for flu-like symptoms, and request anyone exhibiting such symptoms to leave the site immediately.
- Essential Personnel should maintain approach distances whenever possible.
- Institute a flu-like symptoms monitoring program for Essential Personnel and send workers exhibiting such flu-like symptoms home immediately.
- Acquire entertainment such as television, DVD player, radio, etc. for off-shift Stage 3 Personnel.
- Arrange for chemical deliveries necessary to keep tanks "topped off" in case of a Stage 3 event.
- Arrange for fuel deliveries necessary to ensure EDG and Diesel Driven Fire Water Pump tanks are "topped off" in case of a Stage 3 event.
- Monitor local conditions, and issue event notifications as appropriate, but no less than once per shift until Stage 2 event has ended.
- If the pandemic has resulted in a "lock down" in critical operating functions (control rooms), determine how employees will be accommodated.

2.3. Plan Elements for Stage 3

- A Stage 3 declaration is at the discretion of the Plant Manager.
    - An Event Notification Level 3 should be sent immediately upon the decision to elevate to Stage 3
- Mobilize Stage 3 Personnel
    - Employees should be prepared for a seven (7) day potential lock down.
- Restrict plant access to Stage 3 personnel only.

- Continue wipe-downs of phones, doorknobs, counters and controls.
- Provide on-site critical operations staff with personal protective equipment.
- Monitor local conditions, and issue event notifications as appropriate, but no less than once per shift until Stage 3 event has ended.

3. DUTIES AND RESPONSIBILITIES

Responsibilities during a Pandemic will follow normal operating routine. Special responsibilities are listed below.

3.1. Employees:

Report to work as scheduled until such a time that Stage Three of this procedure has been declared.

When an employee has contracted or suspects that they have contracted a virus or have been exposed to a virus, the employee is to seek medical attention and advise his/her supervisor.

After the Pandemic: Any employee who either has a family member still showing signs of the Flu or they are showing sign signs of the flu should continue to stay home till they are cleared by a Physician. At such time the employee will return to normal work duties.

Members for the Pandemic Lock Down Crew should have all of their personal and family interests taken care of prior to issuance of Stage Three of the POP.

Stay in touch with management for scheduling changes.

3.2. Site Management:

Direct all plant activities.
Initiate all phases of the Pandemic Preparedness Plan as necessary.
Release all non-essential personnel when/if appropriate.

Appendix 1

PANDEMIC PLAN FACILITY LOCK DOWN CREW

During a Pandemic Lock Down, a crew of 9 members will be designated from personnel on site and or the volunteer list. The members are as follows:

Operations	Alternates
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

ICE	Mechanical
_____	_____
_____	

Note: 2 Shift Supervisors, 2 CRO's, 2 APO's, 1 Mechanical and 2 ICE.

Appendix 2

PANDEMIC XXXXX ACCESS QUESTIONNAIRE

The World Health Organization (WHO) determined on March XX, 20XX, that the current outbreak of the xxxxx is a pandemic. Panda Power is continuously monitoring the situation, evaluating all new developments and establishing measures to protect the health of our employees and contractors. To ensure the health of everyone working on the Panda site, we ask for your cooperation and please respond to the following questions.

Visitor's Name (Print):	Personal Phone Number (mobile/home)
Visitor's Company/Organization:	Name of Panda Contact:
Facility Name: Panda Sherman Power	

Please put a check mark by all the conditions that apply to you.

[ ] Within the last 14 days, I have **NOT** traveled outside the contiguous 48 United States.

[ ] I have **NOT** had a household or close family member with whom I've been in a closed environment within the last 14 days, who has traveled outside the contiguous 48 United States.

[ ] Within the last 14 days, I have **NOT** been in close contact (within 6 feet for 5 minutes or more) with someone who has tested positive for xxxxx?

[ ] Within the last 14 days, I have **NOT** tested positive for the xxxxx?

[ ] Currently I am **NOT** experiencing cold or influenza-like symptoms in the last 14 days (to include fever, cough, sore throat, respiratory illness, difficulty breathing)?

NOTE: IF ANY OF THESE ANSWERS CHANGE WHILE YOU ARE WORKING FOR PANDA, PLEASE IMMEDIATELY NOTIFY YOUR SUPERVISOR AND YOUR PANDA CONTACT.

*By signing this form, you declare, you have reviewed this information and completed this document to the best of your knowledge.

Signature (Visitor) : _____ Date Completed:_____

Manager/Reviewer: If any of the above items are **NOT** checked, medical documentation may be needed prior to access to site. If medical documentation is needed, the individual should follow-up with their personal healthcare provider or can contact a local clinic.

Access allowed: ☐YES ☐NO

Reviewer Signature: _____Date Completed:_____

Sherman Power LLC	Emergency Operations Plan	
Number: **Section 7**	Subject: **Cyber Security Incident**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. PURPOSE

This plan addresses the actions and reporting procedures to be followed by Panda Sherman Power in the event of a Cyber Security Incident. This Plan ensures that an incident response plan is in place to detect and mitigate incidents and restore identified Bulk Electric System Cyber Systems (BCS) computing services.

2. SCOPE

This plan applies to all Panda Sherman Power employees, contract and vendor personnel responsible for the operation, protection and maintenance of Bulk Electric System Cyber Systems (BCS) that support Bulk Electric Systems, including those having authorized cyber or authorized unescorted physical access to BCSs.

3. DEFINITIONS AND DEFINED TERMS

Cyber Security Incident: A malicious act or suspicious event that compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter or, disrupts, or was an attempt to disrupt, the operation of a BES Cyber System.

Reportable Cyber Security Incident: A Cyber Security Incident that has compromised or disrupted one or more reliability tasks of a functional entity.

NERC Glossary of Terms can be accessed by clicking the following link:
http://www.nerc.com/pa/Stand/Glossary of Terms/Glossary_of_Terms.pdf

4. ROLES AND RESPONSIBILITIES

Detection by direct observation and internal reporting of a Cyber Security Incident are the responsibilities of each Panda Sherman Power employee and vendor. These personnel are entrusted with the responsibility of safeguarding the physical or cyber security of CIP-related assets, which includes all identified Low Impact BCSs.

The following roles collectively comprise the Cyber Security Incident Response Team (CSIRT). These job titles have specific roles and responsibilities assigned to them. It is understood that all plants are different and may have various job titles that meet these roles.

A. Panda Sherman Power CIP SENIOR MANAGER OR DELEGATE(S)

Functions as the onsite incident responder providing overall direction and authority during a Cyber Security Incident, leading the classification and response to the incident, and coordinating other communication as necessary. The CIP Senior Manager or Delegate(s) assists in the determination of a Reportable Cyber Security Incident.

B. Panda Sherman Power STAFF

The incident response team consists of senior plant management, physical security specialists, network and control specialists, and applicable personnel. Other Panda Sherman Power business units, information technology, business analysts, and contractors may also be part of these teams depending on the issue and recovery required.

Position	Role	Responsibility
Plant Engineer	Recovery team lead	Lead recovery efforts
Operations Manager	Plant expert	Responsible for determining functionality of plant
Logic SME	Network expert	Responsible for restoring network
Shift Supervisor	Operations expert	Assist Plant Engineering and Operations Manager in assessment
Maintenance Manager	Crew Lead	Responsible for coordinating labor needs. Responsible for support of Incidents involving Physical Security
IT Manager/IT personnel	IT SME	Responsible for technical insight, device log collection, review, and preservation

C. VENDORS

CIP-related asset vendors may have an essential role in ensuring the CSIRT understands how to resolve or work around equipment failures and how to resume operations when necessary. CIP-related asset vendors may also be called upon for the supply of replacement software and hardware.

5. CYBER SECURITY INCIDENT RESPONSE PROCEDURE

A. IDENTIFICATION

Upon discovery of a potential Cyber Security Incident, immediately notify the On-Shift Operator. The On-Shift Operator shall then contact the Shift Supervisor, who will alert the CIP Sr. Manager and work with the organization's technical support staff or vendor to determine if there is a Cyber Security Incident or other issue affecting the system.

A Cyber Security Incident (CSI) is defined as a malicious act or suspicious event that compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter or, disrupts or was an attempt to disrupt, the operation of a BES Cyber System. The following conditions may indicate a CSI has occurred:

a. Routine systems monitoring detects a known or potential incident such as:

   i. Endpoint Protection alerts
   ii. Intrusion Detection System (IDS) alerts
   iii. Security Information and Event Management (SIEM) alerts
   iv. Policies changed (firewall, Group Policy Object (GPO), etc.)
   v. System hardening settings changed
   vi. Physical Security Perimeter breach

b. Unexplainable behavior of a BCS and/or BES Cyber Assets (BCAs) within a BCS.

c. Unexplainable loss of BCA or BCS functionality

d. Notification of a potential CSI by an external entity, including law enforcement, CERT or E-ISAC.

e. Notification of a potential CSI by an employee, contractor or vendor.

NOTE:

Appendix A has other example conditions that may indicate a potential CSI has occurred.

B. ASSESSMENT AND CLASSIFICATION

Record the following information as applicable in the initial assessment and investigation on RCP-NERC-CIP-003-ATT-G. Please note that the following list is not exhaustive:

a. When, how, and by whom was the event reported (from Section 3.A)?
b. What system functionality is affected?
c. Are generation or transmission assets affected?
d. How many BCAs and/or BCSs are possibly affected?
e. Indicate results of log(s) examination on all access and monitoring devices and suspect systems.
f. Was unauthorized electronic and/or physical access gained?
g. Was there a compromise or disruption of one or more of reliability tasks? Reliability tasks are listed in Attachment B and defined in NERC Standard CIP-002-5.1a.

Based on the assessment above, the CSIRT shall classify the event as a Reportable CSI if the CSI has compromised or disrupted one or more reliability tasks of Panda Sherman Power.

If the CSI is determined to be Reportable (also review EOP-004 & DOE reporting requirements), then proceed to Section D, Communication Protocol, and initiate the reporting process, then return to Section C. Some incident types have a limited reporting window starting (within 1 hour) from when the CSI was determined to be reportable.

If the event is determined not to be a Reportable CSI, continue to document the investigation on the RCP-NERC-CIP-003-ATT-G, retain that form and any other evidence, and skip Section D.

C. RESPONSE AND INCIDENT HANDLING

The incident response process will be initiated when there is an event that requires further investigation. The CIP Senior Manager, Delegate(s) or assigned Incident Coordinator will assemble the CSIRT, initiate measures to contain the incident, implement measures to eradicate the threat and determine whether the incident is resolved or to implement device recovery.

i. Containment

Containment must be performed at the earliest possible stage to avoid cascading incidents. If the threat is internal from a compromised system or device, the device should be isolated from the network to reduce the threat to unaffected systems. If the threat is external such as an attempt to access the low impact physical security area or electronic security area, steps should be taken to sever or block the external accessibility to the extent possible.

Prevent future electronic or physical access that could cause additional damage.
Engage internal and external support resources as needed.
If the event involved physical access to a PSP or system, investigate how access was obtained.
Reassess damage and capabilities of impacted systems per the Section B.
Engage local law enforcement as required. Phone numbers can be found in procedure RCP-NERC-EOP-004-3-ATT-A.

ii. Evidence Collection and Documentation

Document the identification, assessment and/or actions taken in response to the event. Examples may include any of the following:

Dated Documentation
Security Logs
Police Reports
Emails
Checklists
Forensic Analysis Results
Restoration Records
Post-Incident Review Notes
OE-417 Form
Document any deviations from the plan taken during the response.

iii. Data Preservation

Collection of information from the target system should be conducted in accordance with the appropriate forensic practices, where possible. Other relevant data that may correlate with the evidence of unauthorized access, including intrusion detection alerts and firewall logs, should be collected. Collected evidence should be securely stored.

Preserve records of electronic and physical access to the cyber assets
Data on disk drives of cyber assets shall be copied, mirrored, or replaced prior to recovering the asset where possible.
Configuration files of firmware based cyber assets shall be saved to a secure location.
Eyewitness accounts shall be documented.

Restoration of the BES and the safety of employees, contractors, and the public will take priority over the preservation of CSI data preservation.
Record chain of custody of all evidence collected.

iv. Eradication, Recovery and Resolution

Successful attackers frequently install root kits, which modify or replace system binaries and other files. Root kits hide much of what they do, making it tricky to identify what was changed.

If an attacker appears to have gained root access to a system:

a. Restore the system from a known good backup or reinstall the operating system and applications
b. Change all passwords on the system, and possibly on all systems that have trust relationships with the victim system

If an attacker only gains a lesser level of access than administrator-level, eradication and recovery actions should be based on the extent to which the attacker gained access.

D. COMMUNICATION PROTOCOL

Initial Identification Notification – Immediately upon detection of a possible CSI, notify the CIP Senior Manager or Delegate(s). Notifications may originate from any of the personnel listed in the CSIRT roles that receives alerts from applicable sources, including any employee or vendor who is entrusted with the responsibility of safeguarding the physical and/or cyber security of Panda Sherman Power's CIP-related Cyber Assets.

Vendor Support - If required, the CSIRT is responsible for initiating vendor support services. Such communication may be appropriate to enable a deeper investigation of the incident or resumption of services.

Required Reporting

a. E-ISAC & DOE

(1) Reporting an incident to DOE and E-ISAC is time sensitive, in some cases within one hour of determining a Reportable CSI. Reporting should be done using the Department of Energy OE-417 form. The form and instructions are found at the link below. The report can be submitted online directly to DOE and E-ISAC with a copy being emailed back to the originator (for documentation and forwarding to additional reporting recipients, if necessary). If emailing the form, apply encryption if necessary.

http://www.nerc.com/pa/CI/ESISAC/Pages/Report-an-Incident.aspx

(2) Ongoing communication with DOE and E-ISAC will be coordinated through the CIP Sr. Manager or Delegate.

Texas RE

The CIP Senior Manager or Delegate(s) will submit or direct submission of the same DOE Form OE-417, to the Regional Entity via email as required.

b. Electric Reliability Council of Texas, Inc., Electric Reliability Council of Texas, Inc. and ERCOT / ONCOR

Operating personnel on duty will make notifications to the other parties in the interchange via phone or email as directed by the CIP Sr. Manager

6. EVIDENCE RETENTION

Panda Sherman Power will retain data or evidence to show compliance with each requirement for three calendar years unless directed by its Compliance Enforcement Authority ("CEA") to retain specific evidence for a longer period.

Panda Sherman Power LLC	Emergency Operations Plan	
Number: **Section 8**	Subject: **Physical Security Incident**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. PURPOSE

The purpose of this procedure is to describe the plan for responding to physical security incidents at Panda Sherman Power, LLC. This document will outline how to detect and react to physical security incidents, determine their scope and risk, respond appropriately and quickly, and communicate the results and risks to appropriate parties.

2. SCOPE

This incident response plan applies to all employees, contractors, clients and visitors of Panda Sherman Power, LLC. This plan does not cover cybersecurity incidents or data breaches. For information about responding to incidents involving information systems and networks of Panda Sherman Power, LLC., see Section 7 Cybersecurity Incident.

3. DEFINITIONS & EXAMPLES

An incident is an event that violates the policies, standards or Code of Conduct of Panda Sherman Power, LLC. or that threatens the safety and well-being of Panda Sherman Power LLC. employees, contractors, or visitors.
Examples of incidents include:

- Workplace accidents and injuries
- Health and safety incidents
- Near misses
- Physical security breaches (e.g. break-ins)
- Workplace violence

4. ROLES & RESPONSIBILITIES

4.1 Employees are responsible for:

4.1.1 abiding by Panda Sherman Power, LLC. safety and security policies and procedures.

4.1.2 reporting incidents in accordance with the guidelines in Panda Sherman Power, LLC. safety and security policies and procedures

4.1.3 attending periodic training on Panda Sherman Power, LLC. physical security incident response plan, as well as on safety and security issues in the workplace.

4.2 Managers are responsible for:

4.2.1 promoting a safe work environment

4.2.2 taking every reasonable measure to protect their employees

4.2.3 providing Panda Sherman Power, LLC. safety and security policies and procedures to their employees.

4.2.4 assisting with investigations if required

4.2.5 reporting incidents in accordance with the guidelines in Panda Sherman Power, LLC. safety and security policies and procedures

4.3 The Incident Response Team is responsible for:

4.3.1 notifying persons of potential risks

4.3.2 monitoring the implementation of this incident response plan

4.3.3 leading risk assessments and root cause analyses

4.3.4 leading employee training on this incident response plan as well as on safety and security issues in the workplace

4.3.5 reviewing this incident response plan on a periodic basis

4.3.6 responding to all incidents where immediate assistance is required, taking steps to mitigate immediate risks and notify emergency services if required

4.3.7 conducing an initial investigation of all incidents, taking steps to mitigate immediate risks and develop safety plans for affected individuals if necessary

4.3.8 assisting with incident investigations

4.3.9 liaising with law enforcement agencies and participating in legal processes if required

5. INCIDENT RESPONSE STAGES & PROCEDURE

5.1 Stage 1: Preparation

5.1.1 develop and review Panda Sherman Power, LLC. policies and procedures

5.1.2 train employees on Panda Sherman Power, LLC. policies and procedures

5.2 Stage 2: Detection

5.2.1 discover incident through tips or reports

5.2.2 discover incident using security tools or other detection strategies

5.2.3 complete Panda Sherman Power, LLC. incident reporting as required

5.2.4 declare and classify the incident

5.3 Stage 3: Containment

5.3.1 identify, isolate and/or mitigate risks associated with the incident

5.3.2 notify affected parties

5.3.3 decide whether or not to investigate incident

5.3.4 preserve physical and/or digital evidence

5.4 Stage 4: Investigation

5.4.1 determine the incident's priority, scope and root cause

5.4.2 collect physical and/or digital evidence

5.4.3 conduct interviews with complainants and/or persons involved

5.5 Stage 5: Remediation

5.5.1 repair affected systems (if applicable)

5.5.2 communicate to and instruct affected parties about next steps

5.5.3 confirm that the threat has been contained

5.5.4 file formal reports as per regulatory requirements (if applicable)

5.5.5 create of post-incident report

5.6 Stage 6: Recovery

5.6.1 analyze the incident for its procedural and policy implications

5.6.2 gather metrics

5.6.3 review and edit established policies and procedures with lessons learned from the incident

Sherman Power LLC	Emergency Operations Plan	
Number: **Section 9**	Subject: **Water Shortage**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. Purpose

The purpose of this procedure is to provide guidance on actions to be taken in the event of a raw water supply interruption that could impact the generation capability of the Panda Sherman Power, LLC facility.

2. Definitions

For the purpose of this procedure, Water Shortage would imply an interruption of raw water delivery to the Panda Sherman Power facility raw water storage pond along with the failure of the City of Sherman to maintain the raw water pond at the desired normal level.

3. Communications

3.1 Upon discovery of an unintentional loss or unexpected reduction in available raw water supply to the Panda Sherman Power raw water pond, plant staff shall notify the City of Sherman (COS) raw water treatment plant and the Panda Sherman Plant Operations Manager as soon as practical to investigate the cause.

3.2 If the cause of the loss or reduction of raw water flow is determined to be caused by issues outside the operational control of the Panda Sherman Power facility, Plant Management shall maintain communications with the City of Sherman raw water treatment plant Management Staff to determine the cause of the interruption.

3.3 Once a cause of the interruption has been identified, the expected duration of the interruption should be determined and discussed with the City of Sherman. The duration of the supply interruption should be evaluated to determine if plant generation could be impacted.

3.4 Once the risk to the facility is known this risk should be communicated to the Panda Power Funds Corporate Management Team and the Qualified Scheduling Entity.

3.5 As updates become available the Plant Management Team shall routinely update the Panda Power Funds Corporate Management Team and the QSE until raw water supply has been restored and on-site storage has been restored to normal levels.

4. Actions

4.1 Initial Actions shall be to investigate and determine the cause of the loss or reduction of raw water delivery to the Panda Sherman Power raw water pond.

4.2 Once cause of interruption has been determined, the duration of the interruption must be understood to perform an evaluation of Raw Water inventory on site in order to evaluate risk to the facility.

4.3 In coordination with the City of Sherman, efforts shall be made to restore raw water availability as soon as practical. A determination should be made if the City of Sherman's potable water system could supplement Panda's raw water inventory until the raw water deliveries can be restored. Potable water flow can be routed directly to the cooling tower, the fire/service water storage tank or the MPW demineralization system.

4.4 Raw water conservation should be considered in the event the raw water supply interruption is expected to impact the plant generation capability. Conservation alternatives that should be considered would be:

Reduction of duct burner operation during off-peak hours or all hours.

Reduction of Combustion Turbine Evaporative Cooler operation.

Implementation of plant cycling operation to reduce off-peak operation.

4.5 In coordination with the COS & the North Texas Municipal Water District the raw water pipeline can be drained via gravity to the Panda Sherman Power raw water pond until empty. This has proven to supply 1-2 days of water supply to the Panda Sherman facility.

4.6 The NTMWD balancing reservoirs in Howe (4 miles to the south of the Panda Sherman facility) could also be considered as a possible contingency if the Balancing Reservoirs have an inventory of water. This scenario would involve mobilization of a portable pump and temporary piping to pump water from the balancing reservoirs into the raw water pipeline north of the Balancing Reservoirs. Water pumped into the raw water pipeline would gravity flow to the Panda Sherman Power facility. This scenario would require coordination between the City of Sherman, NTMWD and Panda Sherman Power Management and would be dependent on the availability of portable equipment and labor to set-up and oversee the temporary pumping operation.

4.7 When raw water supply has been restored to the Panda Sherman Power Facility, Panda Sherman Operations Plant Management will communicate the resolution to the Qualified Scheduling Entity and coordinate restoration from any water conservation efforts and generation derates.

Sherman Power LLC	Emergency Operations Plan	
Number: **Section 10**	Subject: **EOP Compliance Requirements**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

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1. PURPOSE

The purpose of this section is to provide guidance to maintaining compliance with Texas Administrative Code Rule §25.53 Electric Service Emergency Operations Plans, including but not limited to, the requirements for reviews an updates, training, drills, and affidavits.

2. REVIEWS & UPDATES

2.1 An entity must continuously maintain its EOP. Beginning in 2023 an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

2.1.1 An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must file with the PUCT and executive summary that:

2.1.1.1 describes the changes to the contents or policies contained in the EOP

2.1.1.2 includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.3 includes the record of distribution required under Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.4 contains the affidavit required under Rule §25.53 Electric Service Emergency Operations Plans

2.1.1.5 file with the PUCT a complete, revised copy of the EOP with all confidential portions removed

2.1.1.6 submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.

2.1.2 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 the PUCT:

2.1.2.1 a pleading that documents any changes to the list of emergency contacts as provided under Rule §25.53 Electric Service Emergency Operations Plans

2.1.2.2 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

2.1.2.3 the affidavit required by Rule §25.53 Electric Service Emergency Operations Plans

2.1.3 An Entity must update its EOP or other documents required if PUCT staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through and emergency. If directed by PUCT staff, the entity must file its revised EOP or other documentation, or a portion thereof, with the PUCT and, for entities with operations in the ERCOT power region, with ERCOT.

3. RECORD OF DISTRIBUTION

3.1 A record of distribution contains the following information in table format:

3.1.1 titles and names of persons in the entity's organization receiving access to and training on the EOP

3.1.2 dates of access to or training on the EOP, as appropriate.

4. EMERGENCY CONTACTS

An entity must file with the PUCT a list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent request and questions from the PUCT during an emergency.

5. AFFIDAVITS

5.1 An affidavit must be signed by the highest-ranking representative, official, or officer with binding authority over the entity

5.2 The affidavit must affirm the following:

5.2.1 relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP

5.2.2 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

5.2.3 the EOP has been reviewed and approved by the appropriate executives

5.2.4 drills have been conducted to the extent required by Rule §25.53 Electric Service Emergency Operations Plans

5.2.5 the EOP or an appropriate summary has been distributed to local jurisdictions as needed

5.2.6 the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident

5.2.7 the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management official during emergency events have received the lates IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

6. DRILLS

6.1 An entity must conduct or participate in at least one drill each calendar year to test its EOP.

6.2 Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed.

6.3 An entity conducting an Annual Drill must, at least 30 days prior to the date of at least one drill each calendar year, notify PUCT staff, using the method and form prescribed by PUCT staff on the PUCT website, by email or other written form, of the date, time, and location of the drill.

6.4 An entity that has activated its EOP in response to an emergency is not required, under Rule §25.53 Electric Service Emergency Operations Plans, to conduct or participate in a drill in the calendar year in which the EOP was activated.

7. REPORTING

7.1 Upon request by PUCT staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts.

7.2 Updates must continue until all incident related outages of customers able to take service are restored or unless otherwise notified by PUCT staff.

7.3 After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.

8. TRAINING

8.1 Relevant operating personnel must receive training on the applicable contents and execution of the EOP and subsections.

8.2 An entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events must have received the latest IS-100, IS-200, IS-700, IS-800 National Incident Management System training.

Sherman Power LLC	Emergency Operations Plan	
Number: **Section 11**	Subject: **Revision History Log**	
Approved for Use by:	Current Issue: **REV 0**	Issue Date: **04/09/22**

Rev.	Date	Description	By Initials	Approval Initials
0	04/09/22	Initial Development, Approval and Submittal	DJN	
1				
2				
3				
4				
5				