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TEXAS RETAIL ENERGY EMERGENCY OPERATIONS PLAN

**PURSUANT TO THE PUBLIC UTILITY COMMISSION OF TEXAS
SUBSTANTIVE RULE § 25.35
(16 TAC § 25.35)**

Version History

Version Number	Purpose/Change	Author	Date
0.0 - Initial	Initial EOP – Filed w/PUC	Chris Hendrix / Jim Staggs	4/18/2022

I. EXECUTIVE SUMMARY

Texas Retail Energy, LLC's (TRE's) Initial Emergency Operations Plan (EOP) begins with this Executive Summary which includes the Primary Emergency Contact and the Record of Distribution at the end of this summary.

PRIMARY EMERGENCY CONTACT¹

James Staggs
Senior Manager
(479) 321-9864
(602) 697-2061 mobile
jstaggs@texasretailenergy.com

This Electric Service Emergency Operations Plan outlines TRE's policies and procedures pursuant to the mitigation of hazards that are harmful to the continuity of electric service and, where within scope for an REP, also to life, information, operations, the environment, and property.

Section II of TRE's EOP is its Affidavit beginning on page 5.

The Approval and Implementation section (Section III of the EOP) includes the Introduction and Applicability of the EOP. Beginning on page 6, it explains TRE's REP operations and within Section III is the required:

List of individuals responsible for maintaining (page 6), implementing (page 7), and having the authority to change the EOP (page 8); the Revision Control Summary is on page 2; the dated statement that the current EOP supersedes previous EOPs (page 8), and the date this EOP was most recently approved is on page 7.

Section IV of TRE's EOP is its Communication Plan begins on page 8.

Section V of TRE's EOP is its Plan to maintain pre-identified supplies is on page 9.

Section VI of TRE's EOP is its Plan addressing staffing on page 10.

Section VII of TRE's EOP is its Plan addressing how an entity identifies weather-related hazards—tornadoes, hurricanes, extreme cold or hot weather, drought, flooding—and the process for activating the EOP is on page 11.

Section VIII of TRE's EOP is its Plan addressing drills is on page 11.

The EOP contains four Annexes²:

- Cyber Security Annex located on page 12;
- Hurricane Annex on page 13;
- Pandemic and Epidemic Annex located on page 14; and
- Physical Security Incident Annex on page 15.

¹ 16 TAC § 25.53(c)(4)(B).

² 16 TAC § 25.53(e)(3)(A)-(D).

National Incident Management System (NIMS) Training is on page 16.

Record of Distribution includes the names and titles of the people receiving access to and training on the EOP as well as the date(s) of such.³ An example of the Record of Distribution is shown below, and the confidential Record of Distribution is on Page 17.

Record of Distribution and Training of EOP			
Name	Title	Distribution Date	Training Date
James Staggs	Senior Manager	4/18/2022	4/18/2022

³ 16 TAC § 25.53(c)(4)(A).

II. AFFIDAVIT

AFFIDAVIT OF JAMES STAGGS

**STATE OF ARKANSAS
COUNTY OF BENTON**

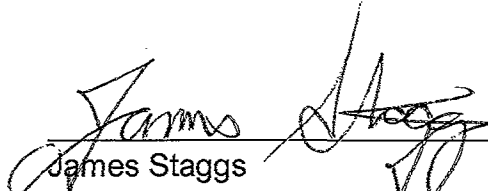
**§
§**

ON THIS DAY, James Staggs, of Bentonville, Arkansas APPEARED BEFORE ME, the undersigned authority, who, after being duly sworn, stated under oath that he is entitled to make this Affidavit, and that the statements contained below are true and correct to the best of his knowledge.

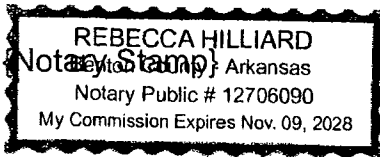
1. I, James Staggs am Senior Manager for Texas Retail Energy, LLC (TRE), a Public Utility Commission of Texas (Commission or PUC) certified retail electric provider (REP) in the Electric Reliability Council of Texas (ERCOT) [certificate number 10065]. I have binding authority over the REP operations.
2. This affidavit is being submitted with TRE's Initial EOP as required by 16 TAC § 23.53(c)(4)(C)(i)-(vi) (aka P.U.C. Subst. R. § 25.35(c)(4)(C)).
3. Contained herein is Texas Retail Energy, LLC's Initial Emergency Operations Plan (EOP) as required by P.U.C. Substantiative Rule § 25.53.
4. All relevant personnel of TRE are familiar with and have received training on the applicable contents and execution of TRE's EOP and have been instructed to follow the applicable portions of TRE's EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.
5. TRE's EOP has been reviewed and approved by all appropriate TRE executives.
6. TRE will conduct drills as required by, and relevant to, 16 TAC § 25.53(f).
7. TRE's EOP and/or Executive Summary has been distributed to local jurisdictions as needed.
8. TRE has a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
9. TRE's designated personnel to interact with local, state, and federal emergency management officials has received the IS-100, IS-200, IS-700, and IS-800 NIMS training.
10. A complete copy of TRE's Initial EOP has been filed at the PUC with all confidential portions removed, pursuant to the 16 TAC § 23.53(c)(1)(ii).
11. TRE's Initial EOP has been filed in its entirety, including all confidential, PROTECTED INFORMATION, pursuant to the 16 TAC § 23.53(c)(5). Such confidential information and


materials contained herein are confidential by law, trade secrets, specific commercial and financial information, proprietary, economic development negotiation information, highly-confidential, commercially-sensitive, intellectual property, and/or confidential because it involves security matters and measures that involve the security of our company, the State of Texas, and the United States of America, including homeland security,

12. The confidential TRE Initial EOP is for the sole use of the intended recipient(s) and contains confidential and privileged information. Any unauthorized review, copy, use, disclosure, or distribution is strictly prohibited. The unredacted version of this EOP is not intended to be subject to any disclosure.


James Staggs
Texas Retail Energy, LLC, Senior Manager

Signed before me on this 18th day of April 2022.





Notary