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1.0 POWER GENERATION COMPANY INFORMATION

PGC Name and Number	Generating Facility Name
Oberon Solar IB, LLC, PGC No. 20512	OBERON SOLAR 1B LLC

2.0 EXECUTIVE SUMMARY - EOP CONTENTS

2.1 Summary of Emergency Operations Annex

The *Emergency Operations Annex* is the over-arching document that sets the policies for severe weather planning, identification of equipment critical failure points, identification of business continuity critical failure points for personnel, restoration of services, and training and drill requirements. This Annex also contains the general emergency site procedures (e.g. evacuation, personnel injuries and treatment, fire and hazardous material response, and suspected threats or sabotage).

2.2 Summary of Pandemic and Epidemic Preparedness Annex

The *Pandemic and Epidemic Annex* serves as the annex for maintaining essential functions and services during a pandemic. This document addresses the specialized continuity planning required by addressing considerations, challenges, and elements specific to the dynamic nature of a pandemic or epidemic. The Annex defines a crisis team that is responsible for evaluation and assessment, as well as the development of response actions and communications.

2.3 Summary of Hot Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme hot weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.4 Summary of Cold Weather Annex

This annex document the programs in place to maintain the facility's reliability and to prevent extreme cold weather-related events from having adverse impacts to reliability or operations. The annex documents the actions that will be taken in advance of each season and in accordance with requirements to safeguard personnel and the facility critical components from weather-related impacts. Included in the annex are checklists to document equipment and inventory reviews, pre-season assessments and communications (which include the review of best practices and lessons learned), as well as during-season reviews and communications.

2.5 Cyber and Physical Security Incident Annex

This annex is specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents. The annex addresses how to identify potential physical or cyber indicators of an incident, and how to escalate, investigate, and report a potential or actual incident.

3.0 EXECUTIVE SUMMARY – DOCUMENT AND REQUIREMENTS MAPPING

Requirement	Addressed in document	Where it is addressed in the document
(d) Information to be included in the emergency operations plan		
(1)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(1)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • B. Roles and Responsibilities (p. 4)
(1)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • C. Revision Control Summary (p. 7)
(1)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • C. Revision Control Summary (p. 7)
(1)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • D. Approvals (p. 6)
(2)(A)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(2)(B)	Emergency Operations Plan	Section 2.0 Communication Plan (p. 7)
(2)(C)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(2)(D)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(3)	Emergency Operations Plan	• Section 3.0 Plan for Pre-Identified Supplies for Emergency Use (p. 8)
	Cold Weather Annex	5.0 Cold Weather Preparation and Response Processes (p. 7) • 5.1 Cold Weather Equipment Inventory List (p. 7) • 5.4 Post-Event and Annual Review (p. 7) • Attachment 4: Cold Weather Equipment Inventory (p. 18) • Attachment 5: Pre-Winter Checklist (p. 19)

Requirement	Addressed in document	Where it is addressed in the document
		• Attachment 7: Extreme Cold Weather Checklist (p. 21)
	Hot Weather Annex	5.0 Hot Weather Preparation and Response Processes (p. 7) • 5.1 Hot Weather Equipment Inventory List (p. 7) • 5.4 Post-Event and Annual Review (p. 7) • Attachment 4: Hot Weather Equipment Inventory (p. 19) • Attachment 5: Pre-Summer Checklist (p. 20) • Attachment 7: Extreme Hot Weather Checklist (p. 22)
(4)	Emergency Operations Plan	• Section 4.0 Plan to Address Staffing During Emergency Response (p. 8) • Section 8.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 10)
	Cold Weather Annex	• 5.6 Additional Staffing Considerations for Weather Events (p. 8) • Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 8) • Attachment 6: Pre-Event Checklist (p. 20)
	Hot Weather Annex	• 5.6 Additional Staffing Considerations for Weather Events (p. 8) • Section 6.0 Business Continuity – Critical Failure Points – Personnel (Staffing) (p. 8) • Attachment 6: Pre-Event Checklist (p. 21)
	Pandemic and Epidemic Annex	Section 5.0 Essential Roles and Personnel (p. 5)
(5)	Emergency Operations Plan	• Section 5.0 Identification of Weather-Related Hazards (p. 8) • Section 6.0 Process for Activating the EOP (p. 9)
(6)	Cold Weather Annex, Hot Weather Annex, Cyber and Physical Security Incident Annex, Pandemic and Epidemic Annex	• Cold Weather Annex • Hot Weather Annex • Cyber and Physical Security Incident Annex • Pandemic and Epidemic Annex
(e) Annexes to be included in the emergency operations plan		
(1)(A thru I)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(2)(A)(i)	Cold Weather Annex	Entire document
	Hot Weather Annex	Entire document
(2)(A)(ii)	Emergency Operations Plan	1.3 Statements of §25.53 Non-Applicability

Requirement	Addressed in document	Where it is addressed in the document
	Cold Weather Annex	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction
	Hot Weather Annex	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction
(2)(A)(iii)	Cold Weather Annex	• 5.4 Post-Event and Annual Review (p. 7) • Attachment 5: Pre-Winter Checklist (p. 19) • Attachment 7: Extreme Cold Weather Checklist (p. 21)
	Hot Weather Annex	• 5.4 Post-Event and Annual Review (p. 7/8) • Attachment 5: Pre-Summer Checklist (p. 20) • Attachment 7: Extreme Hot Weather Checklist (p. 22)
(2)(B)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.3 Statements of §25.53 Non-Applicability
(2)(C)	Emergency Operations Plan	Section 10.0 Restoration of Service (p. 12) • 10.1 Failure to Start or Tipping Off-line (p. 12) • 10.2 Response Time and Backup Power (p. 12)
(2)(D)	Pandemic and Epidemic Annex	Entire document
(2)(E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.3 Statements of §25.53 Non-Applicability
(2)(F)	Cyber and Physical Security Incident Annex	Entire document
(2)(G)	Cyber and Physical Security Incident Annex	Entire document
(3)(A thru E)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability
(4)(A thru F)	Emergency Operations Plan	Section 1.0 Approval and Implementation (p. 3) • 1.1 Introduction • 1.2 Applicability • 1.3 Statements of §25.53 Non-Applicability

4.0 RECORD OF DISTRIBUTION AND TRAINING

This table presents information, as required, of the persons in the entity's organization receiving access to and training on the EOP, as appropriate.

Organization Name	Individual Name	Title	Date(s) of Distribution, Access, or Training on EOP
174 Power Global	Mark Behm	Compliance Manager	2022.04.15

Organization Name	Individual Name	Title	Date(s) of Distribution, Access, or Training on EOP
174 Power Global	Gerry Rodriguez	Sr. Asset Manager	2022.04.15

5.0 Emergency Contacts

Type of Contact	Individual Name	Title	[redacted]
Primary	Mark Behm	Compliance Manager	

STATE OF TEXAS §
§
COUNTY OF TRAVIS §

AFFIDAVIT OF HENRY YUN

Before me, the undersigned authority, on this day personally appeared Henry Yun, who, having been placed under oath by me, did depose as follows:

1. My name is Henry Yun. I am over the age of 18 and fully competent to make this affidavit.
2. I am the President and CEO of Hanwha Energy USA Holdings Corporation d/b/a 174 Power Global, the manager of Oberon Solar IB, LLC ("Oberon IB"), and I am a member of Oberon Solar IB's Senior Leadership Team.
3. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are 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.
4. The EOP has been reviewed and approved by the appropriate executives.
5. The EOP or an appropriate summary will be distributed to local jurisdictions as needed.
6. Drills will be conducted in accordance with 16 TAC §25.53 on or before October 31, 2022.
7. The PGC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
8. Emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have or will have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training by May 31, 2022.

henry yun

Henry Yun

Sworn and subscribed before me, a notary public, in and for the State of Texas this 18th day of April, 2022.

Tiffany Thrasher
Commission # 130024141
Notary Public
STATE OF TEXAS
My Comm Exp. Dec 03, 2022

Notarial act performed by audio-visual communication

TABLE OF CONTENTS

1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This *Emergency Operations Plan* (EOP) describes the policies and processes for Oberon Solar IB, LLC **("Oberon** IB"), a Power Generation Company (PGC) registered with the Public Utility Commission of Texas, (PUCT) as PGC No. 20512, to follow during emergency operations in accordance with the requirements of Chapter 25, Subchapter C, §25.53, of the PUCT Electric Substantive Rules.

This EOP addresses the requirements in *(d) Information to be included in the emergency operations plan*. **Within this and all other EOP documents, the use of "EOP" refers to the entire** suite of documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager identified in Attachment 2.

1.2 Applicability

This EOP, including all attachments, applies to and will be used by Oberon IB to address common operational functions that are relevant across emergency types; the annexes address specific types of emergencies.

1.3 Statements of §25.53 Non-Applicability

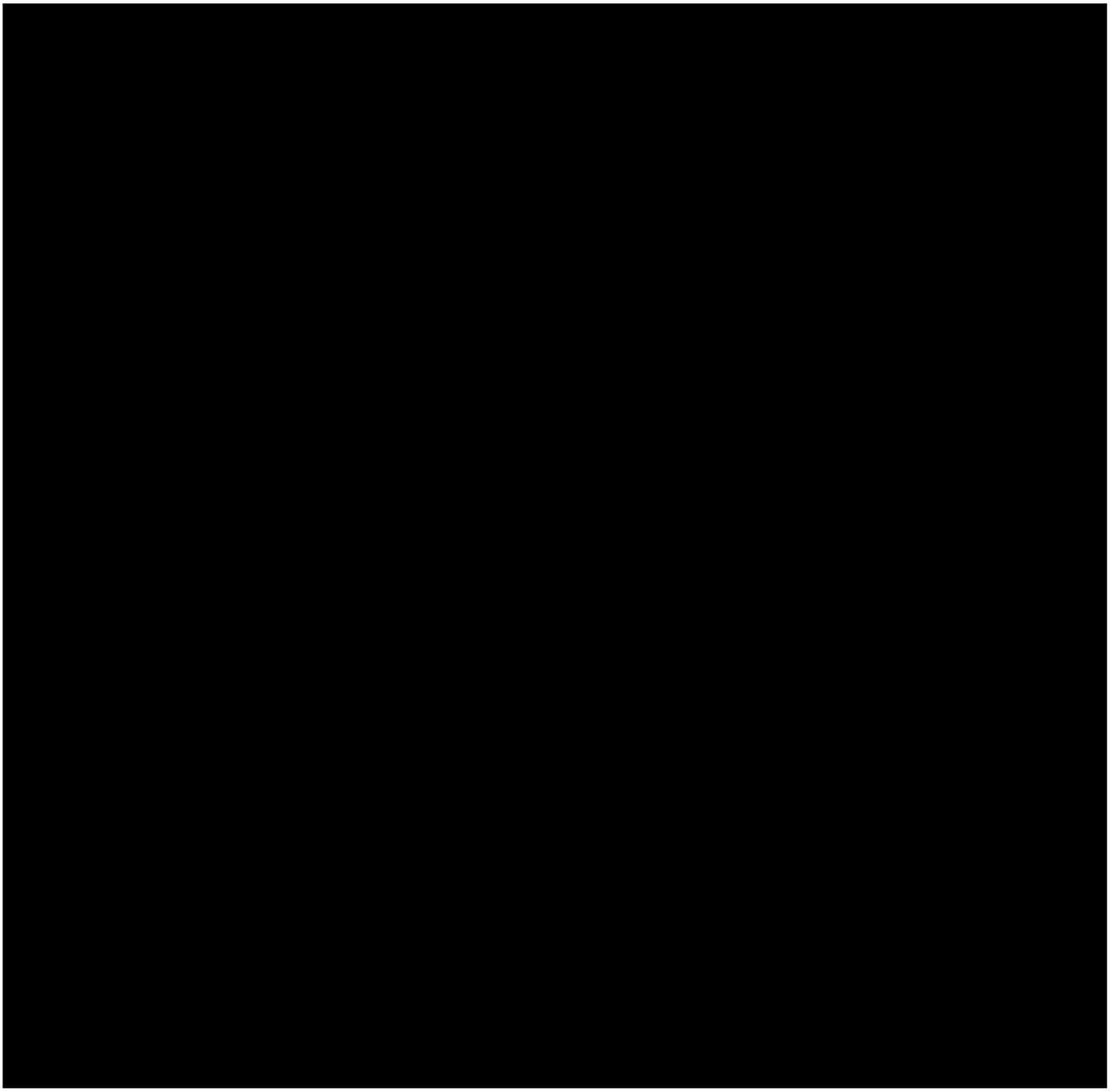
Section	Statement of Non-Applicability
(e)(2)(A)(ii) Adequacy and operability of fuel switching equipment	Oberon IB does not have the capability to perform fuel switching and has no installed equipment to do so.
(e)(2)(B) Water Shortage Annex	Oberon IB does not utilize water in the generation of electricity.
(e)(2)(E) Hurricane Annex	Oberon IB is not located in a hurricane evacuation zone, as defined by the Texas Division of Emergency management (TDEM)[1]

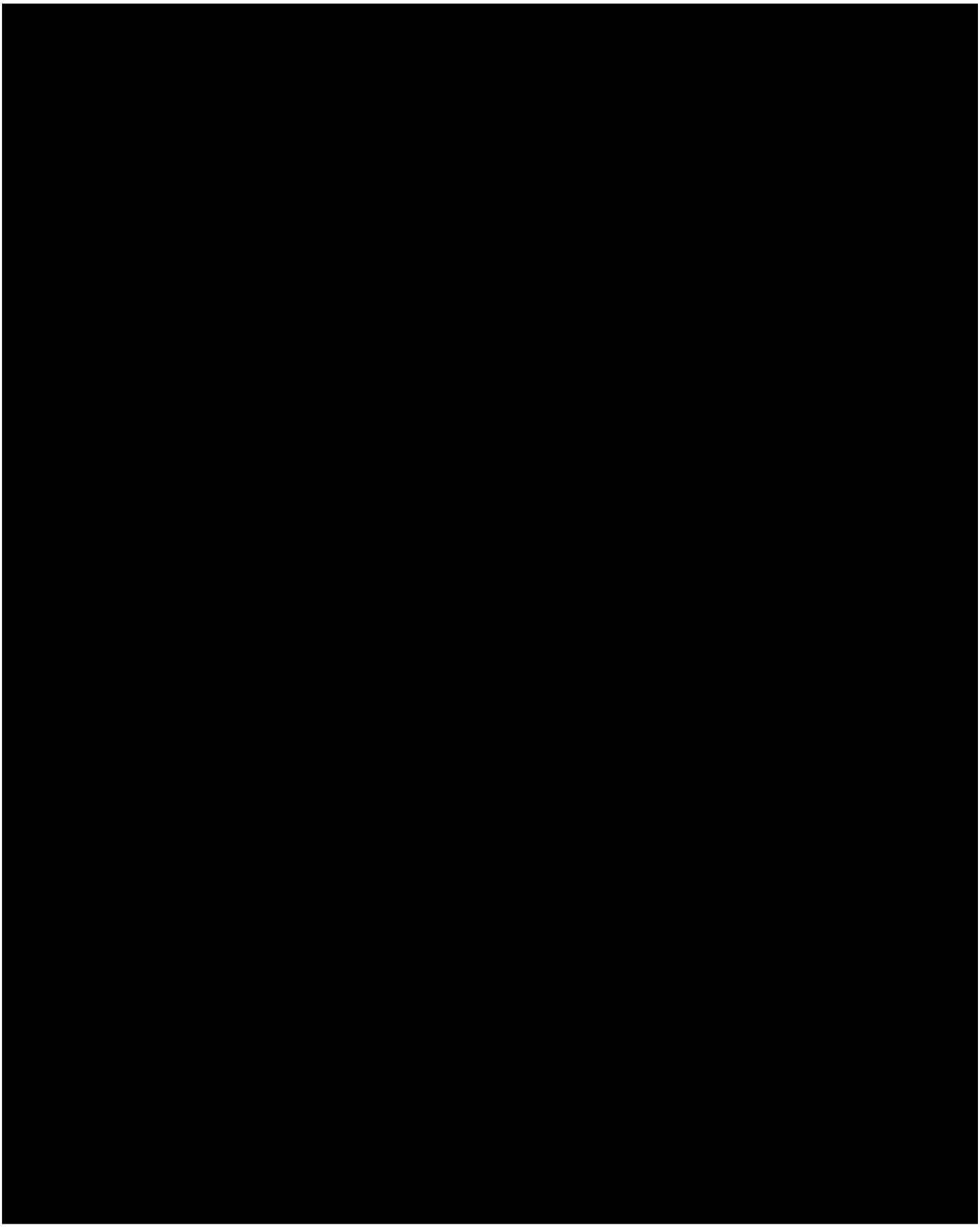
[1] http://ftp.dot.state.tx.us/pub/txdot-info/trv/evacuation/all-districts.pdf

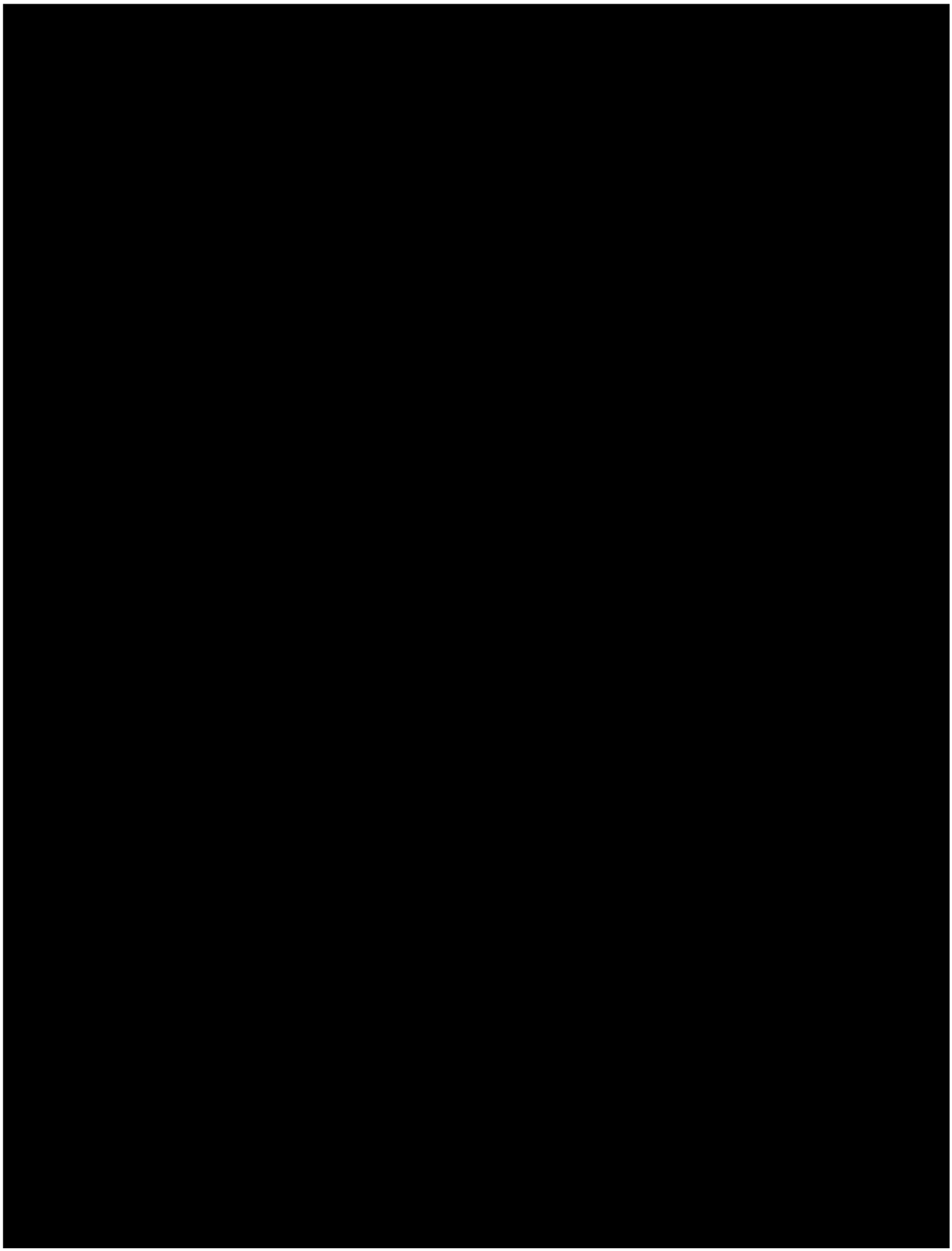
1.4 Generation Resource Information and Location

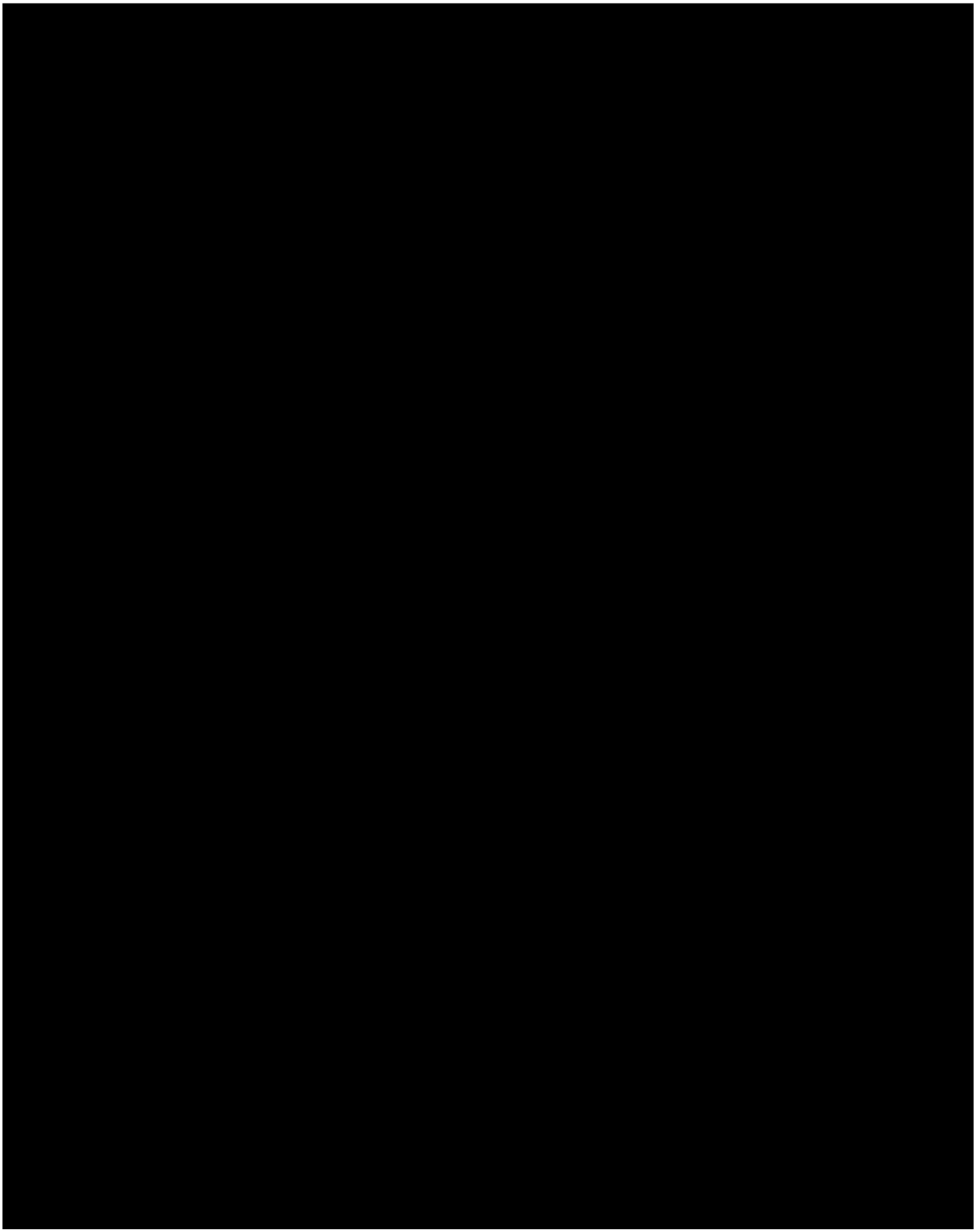
Oberon IB is located in Ector County, Texas and is interconnected to Oncor Electric Delivery at the 138 kV Red Lakes Switch Station, located in the Electric Reliability Council of Texas (ERCOT) footprint. SOLV, Inc is the registered Generator Operator (GOP) for the Oberon IB facility.

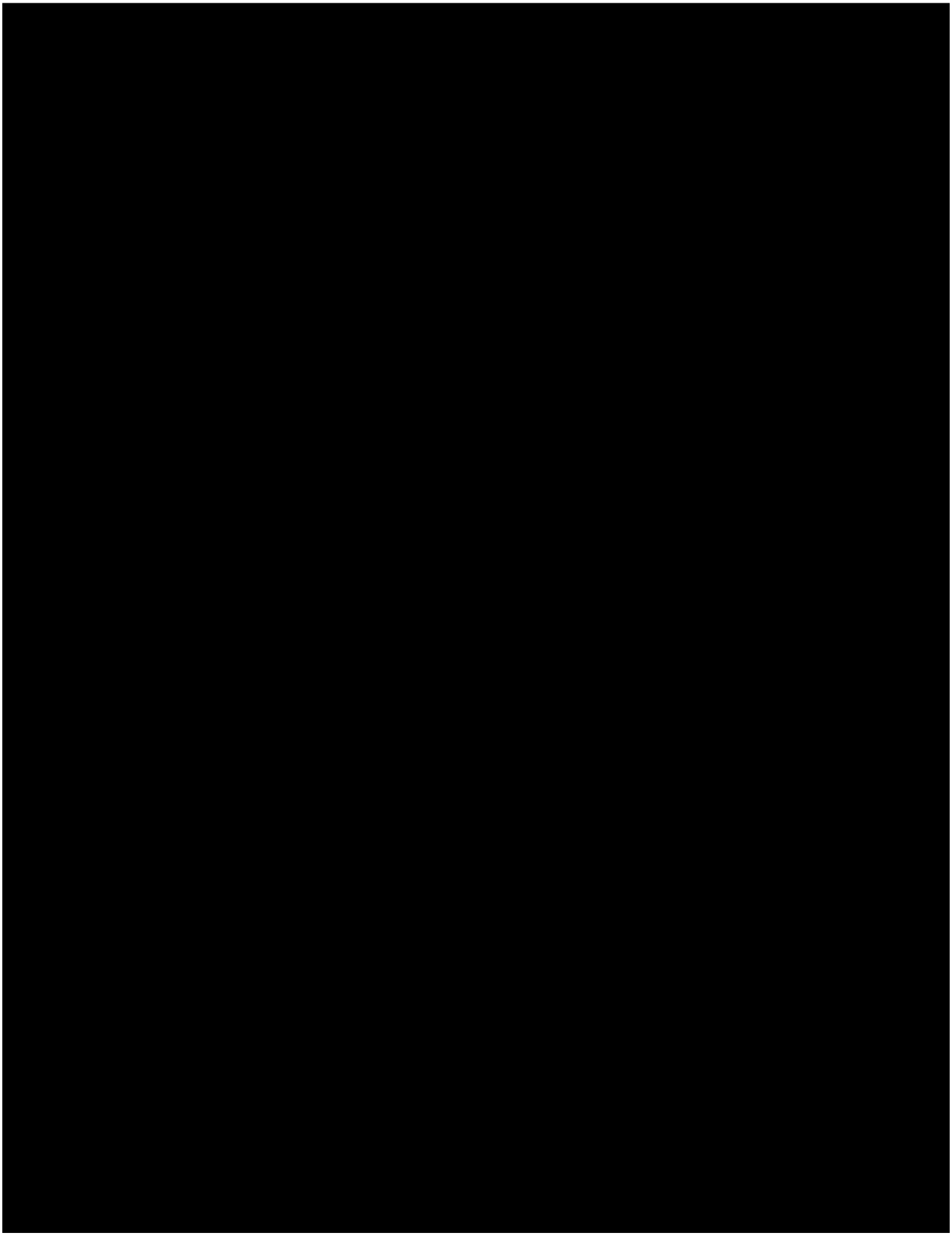
Facility	ERCOT Resource Name	Nameplate Rating	Commercial Operations Date
Oberon IB	OBERON_UNIT_1	30 MVA	7/14/2020

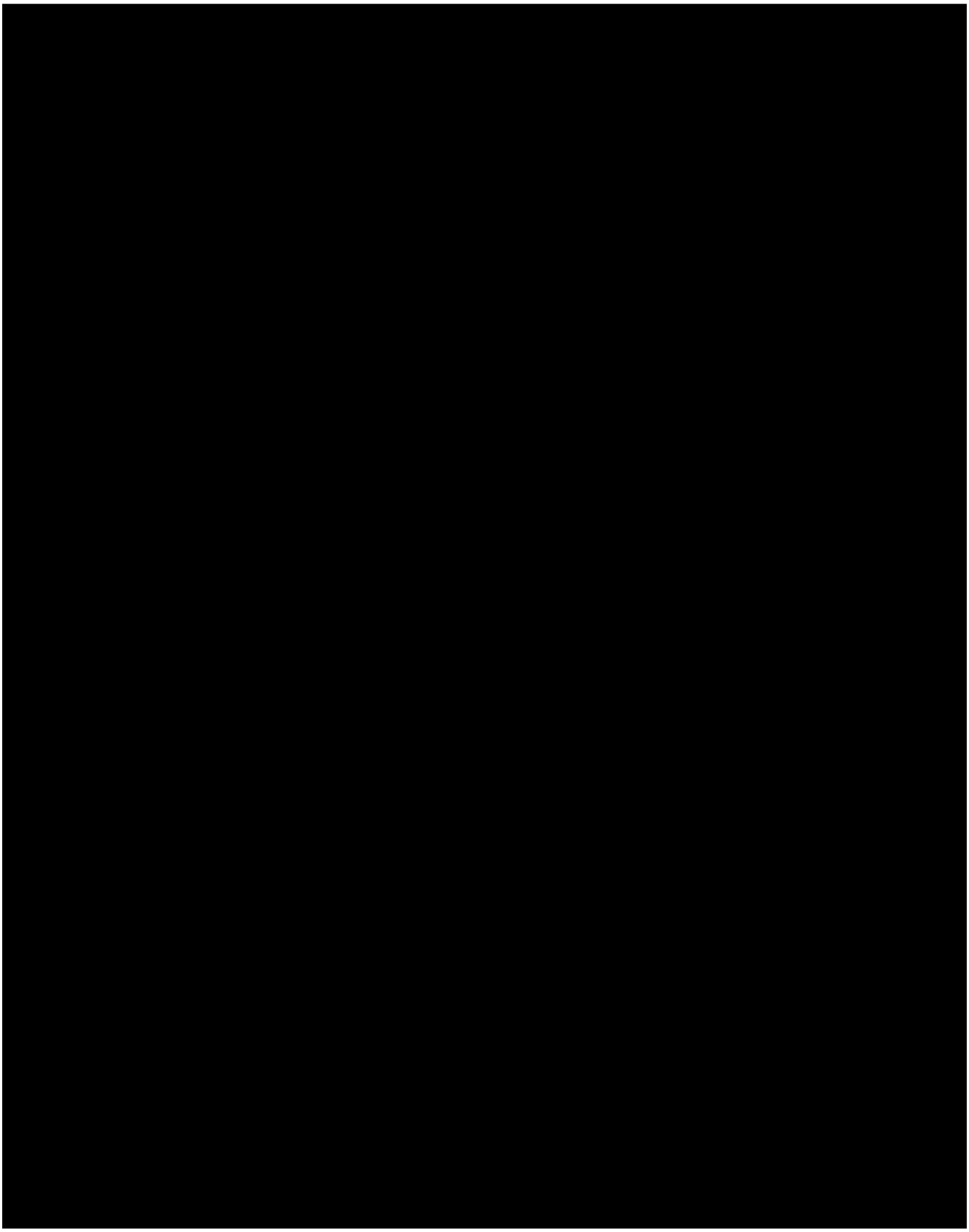


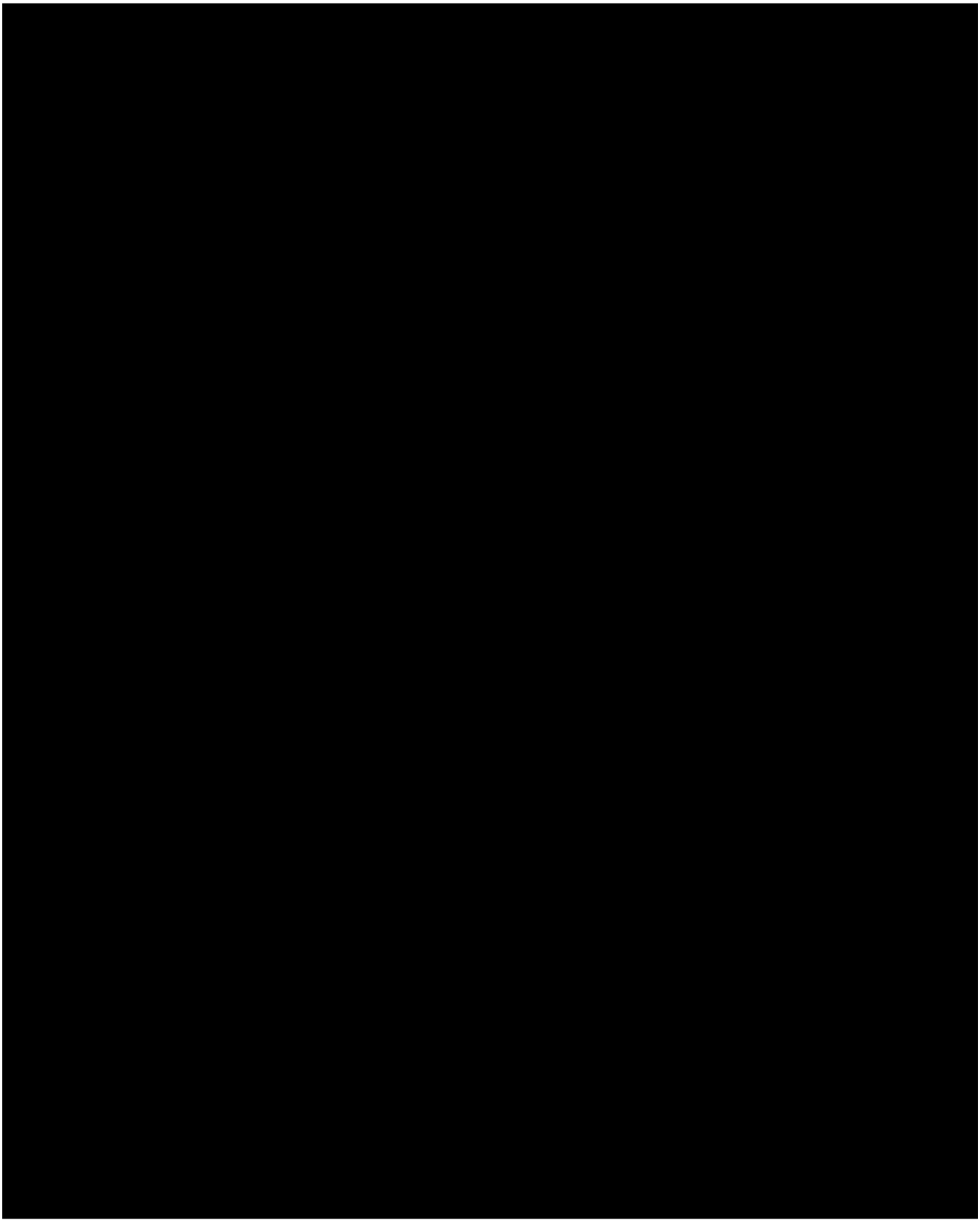


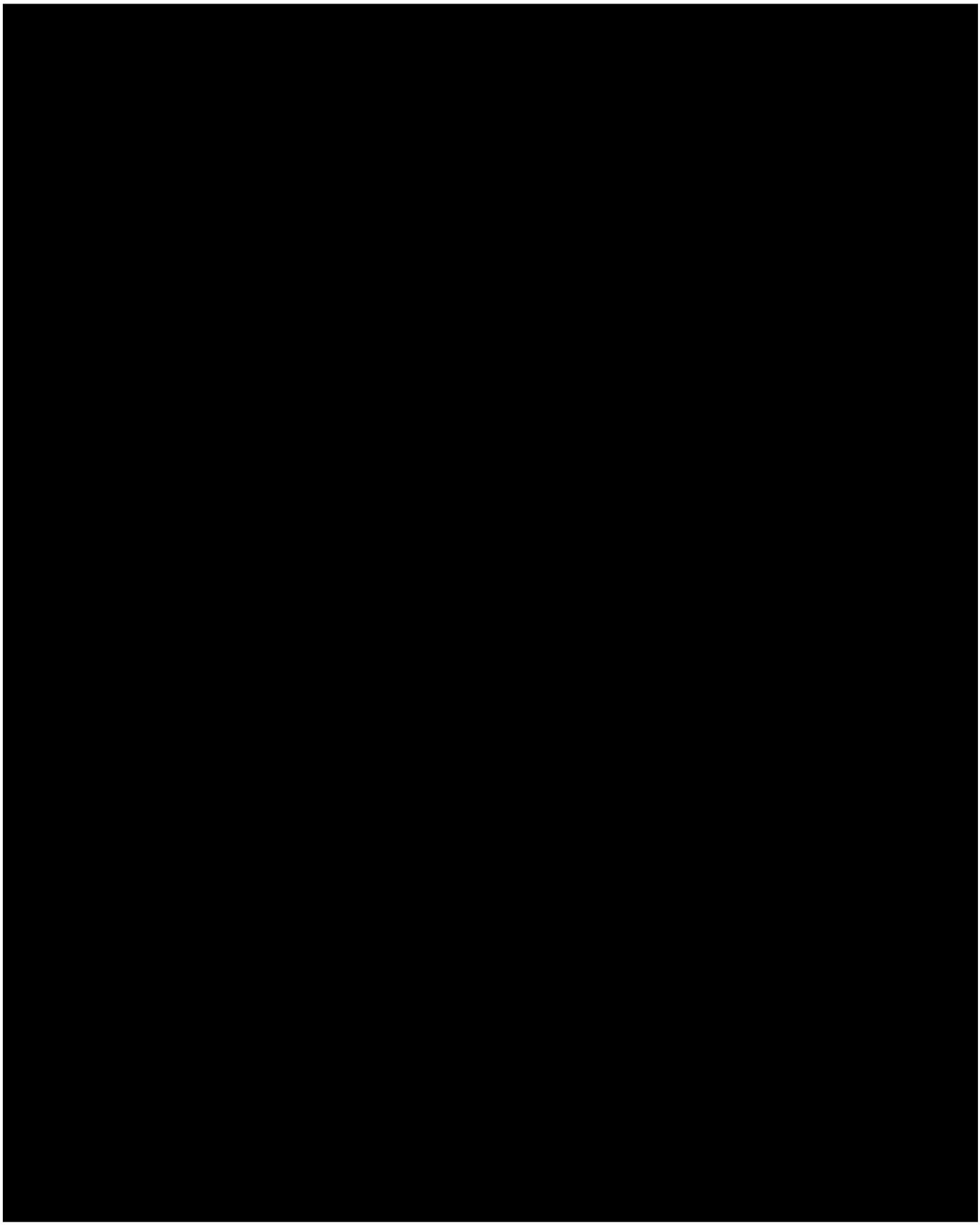












11.0 REQUIRED EMERGENCY OPERATIONS PLAN DRILL

11.1 Requirement for Annual Drill and EOP Update

The PUCT requires that Oberon IB conduct or participate in one or more drills each calendar year to test its EOP.

Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP, as needed. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

11.2 Notification to PUCT and TDEM District Coordinators Prior to Conducting Annual Drill

At least 30 days prior to the date of at least one drill each calendar year the following notifications must be made of the 1) date, 2) time, and 3) location of the drill.

- Commission staff must be notified (using the method and form prescribed on the **commission's website).**
- Appropriate TDEM District Coordinators, by email or other written form.

11.3 Drill Requirements

11.3.1 The content of each drill will be based on current needs and will be determined by the Plant Lead Technician and approved by the Regional Lead Manager, with input from the Compliance Manager, as needed.

11.3.1.1 The annual drill must include a documented evacuation of the O&M/Substation control building (if applicable).

11.3.2 A roster of drill attendees and the date of drill was conducted will be filed with this plan and retained in the Oberon IB document repository.

11.3.3 If the annual drill requirement is fulfilled by an actual event, all event materials must be produced and provide to the Compliance Manager. Evidence should include operating logs, work orders, voice recordings, and other relevant materials.

11.4 EOP Updates

11.4.1 Following the annual drill, the effectiveness of the drill and the EOP will be assessed and the EOP updated, as needed, based on feedback received and provided to the Compliance Manager by the Plant Lead and Regional Lead Manager.

11.4.2 Any improvements to the EOP that are identified following an event or drill will be made and documented (via appropriate update to the version history of this plan) and filed with the Oberon IB EOP.

12.0 ANNUAL TRAINING AND REPORTING REQUIREMENT

The PUCT requires that all relevant operating personnel be familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent that deviations are appropriate as a result of specific circumstance during the course of the emergency.

All relevant operating personnel will receive training each calendar year. Contractors and visitors who will enter operating areas of the facility will be trained on facility alarms, mustering locations, and evacuation procedures before they enter the facility for the first time.

At the end of each calendar year, the SOLV Regional Lead Manager will notify the Compliance Manager, in writing and per the format requirements, that all relevant operating personnel have completed training. The following format will be used to report completion of training:

1. Titles and names of persons in the organization receiving access to and training on the EOP; and

2. Dates of access to or training on the EOP, as appropriate.

13.0 FILING OF EMERGENCY CONTACT INFORMATION WITH THE PUCT

Oberon IB is required to submit and maintain emergency contact information with the PUCT.

If the contact information changes, Oberon IB must provide the updated information to the Commission within 30 days by submitting an *Emergency Contact Information Update* form. See *Resources and Related References* section for Emergency Contact Annual Report and Form links.

14.0 REQUIRED ANNUAL PLAN UPDATE

The Filing Requirements in §25.53 required that information in this EOP and all supporting documents must be updated annually, and no later than March 15, for various circumstances, including, but not limited to the following:

- Changes were made in the previous calendar year that will materially affect how Oberon IB would respond in an emergency.

- An entity that in the previous calendar year did not make a change that materially impacts how Oberon IB would respond in an emergency must also file with the PUCT.

15.0 REQUIRED REPORTING

15.1 Requirement to update EOP Information no later than March 15 Annually

Oberon IB is required to continuously maintain its EOP and must annually updated information within the EOP no later than March 15.

15.1.1 If EOP changes were made in the previous calendar year that materially affects how Oberon IB would respond to an emergency, the following items must be completed:

15.1.1.1 File an executive summary with the commission;

15.1.1.2 File a complete, revised copy of the EOP with all confidential portions removed; and

15.1.1.3 Submit to ERCOT the revised unredacted EOP it its entirety.

15.1.2 If no EOP changes were made in the previous calendar year that materially affect how Oberon IB would respond to an emergency, the following items must be completed:

15.1.2.1 A pleading that documents any changes to the list of emergency contacts, as required;

15.1.2.2 An attestation stating that no changes were made to the EOP that material affects how it would respond to an emergency; and

15.1.2.3 The required affidavit.

If commission 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 an emergency, Oberon will update the EOP and, if directed by commission staff, file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.

15.2 Reporting During Activation of the State Operations Center by TDEM

Upon request by commission 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. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. 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.

Oberon IB **will comply with commission staff's requests during an**d following an activation of the State Operations Center by TDEM and provide commission staff with any requested information in accordance with 25.53(g).

15.3 ERCOT Requirement for Annual Weatherization Declaration Submittals

Oberon IB is required to submit declarations for both summer and winter weatherization preparations, per the Nodal Protocols, Section 22 (Attachment K and Attachment O).

Summary Table of Annual Weatherization Declaration Filing Requirements	
What must be filed:	**Filing due date:**
Summer Declaration, Attachment K	No earlier than May 1 and no later than June 1

Summary Table of Annual Weatherization Declaration Filing Requirements	
What must be filed:	**Filing due date:**
Winter Declaration, Attachment O	No earlier than November 1 and no later than December 1

16.0 RESOURCES AND RELATED REFERENCES

Oberon Cyber and Physical Security Incident Annex

Oberon Pandemic and Epidemic Annex

Oberon Hot Weather Annex

Oberon Cold Weather Annex

ERCOT

Resource Entities webpage: http://www.ercot.com/services/rq/re

Current Protocols – Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline Coordination for Resource Entities with Natural Gas Generation Resources**
- **Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:

https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

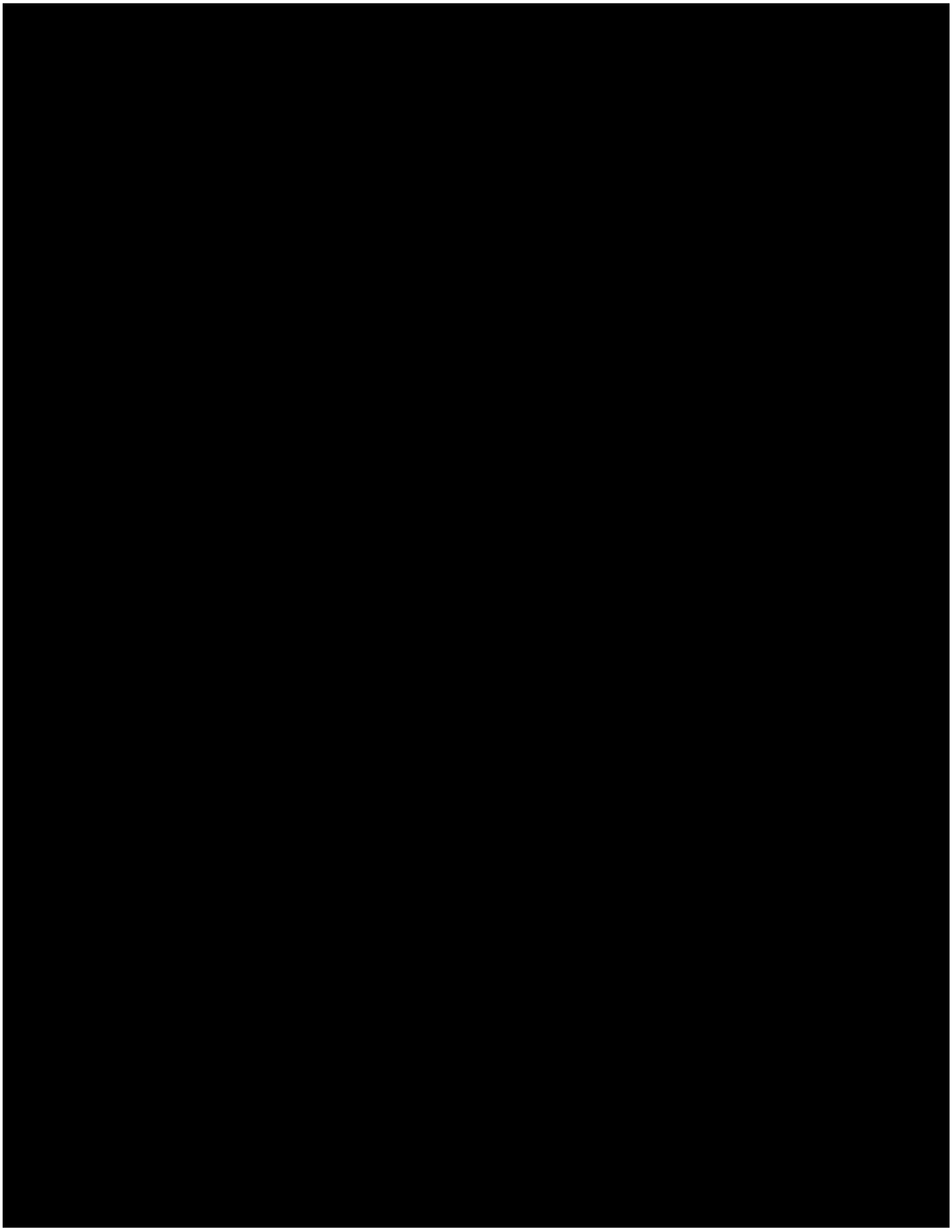
- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

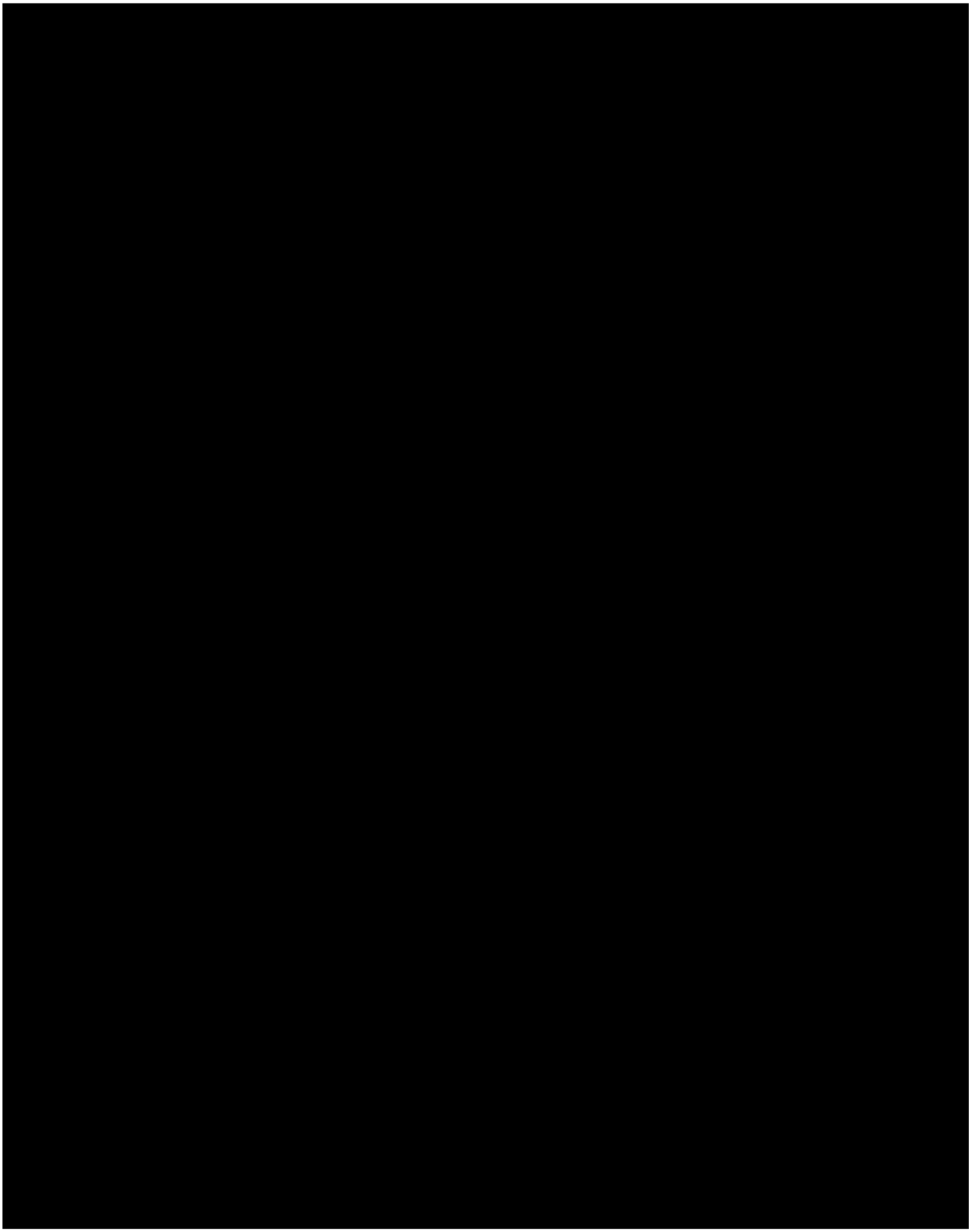
Emergency Contact Update Form (posted under Emergency Management section)**:**
https://www.puc.texas.gov/industry/electric/forms/

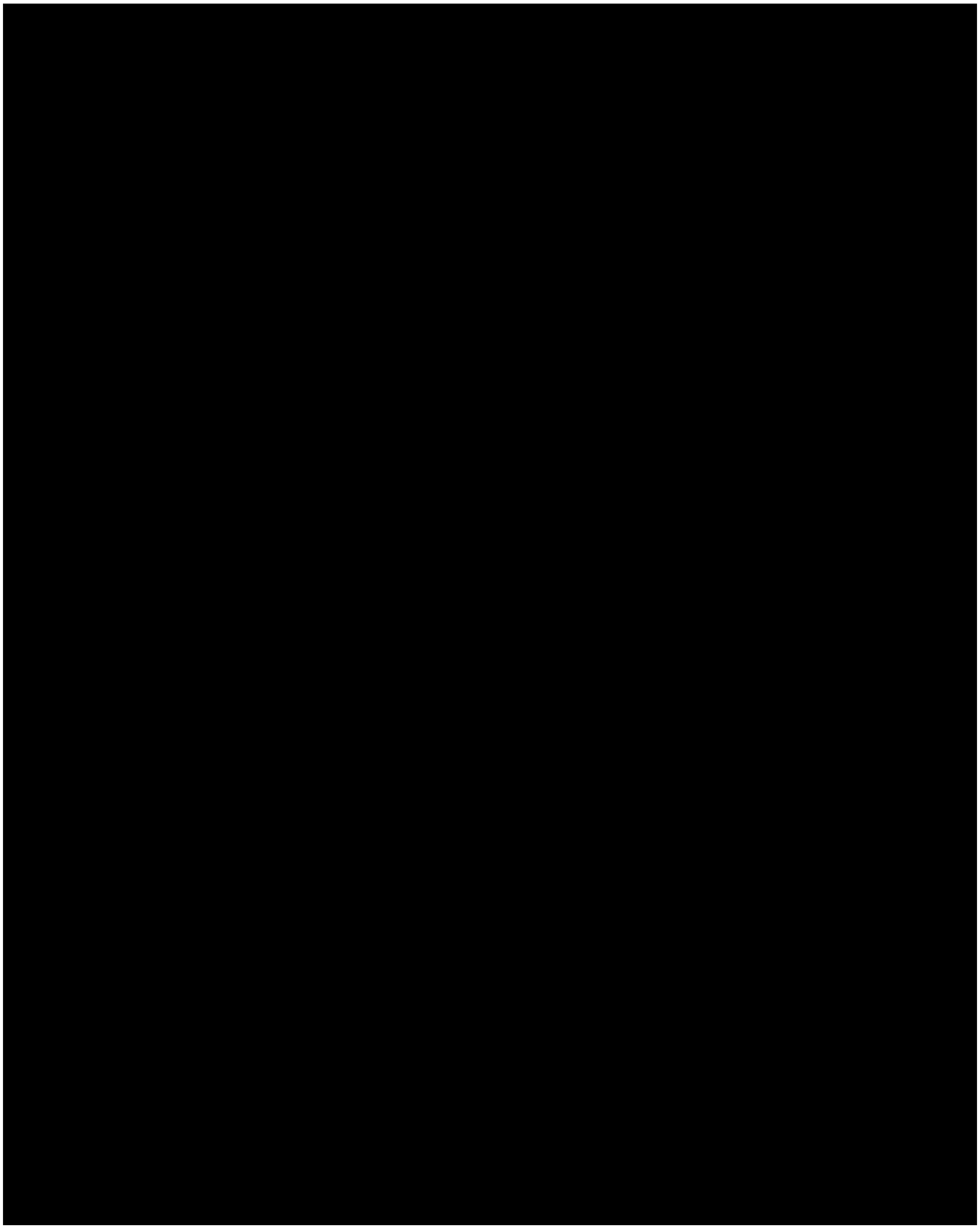
17.0 SECTION 25.53 DEFINITIONS

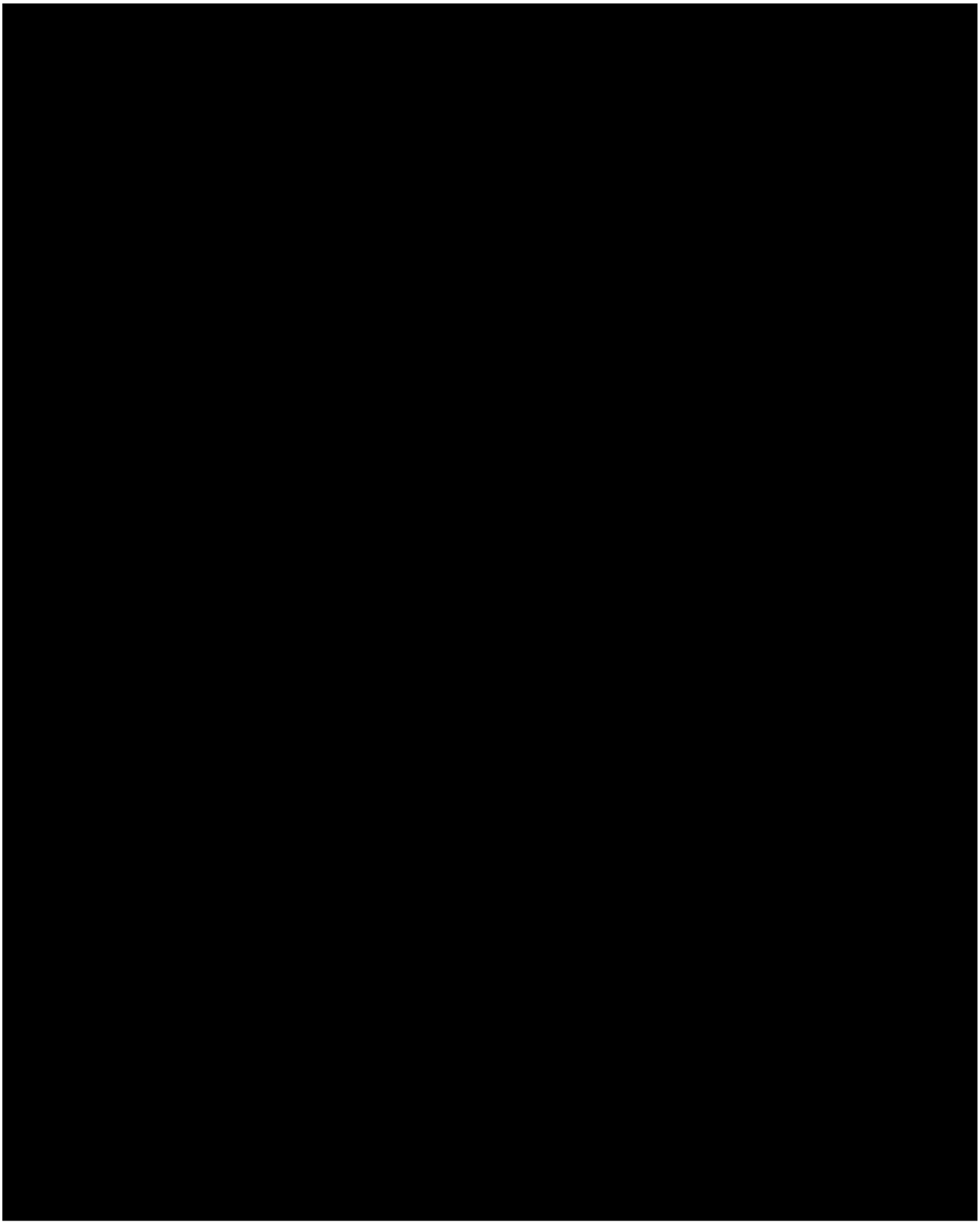
Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an **entity's EOP or a portion of an entity's EOP. A drill may be**

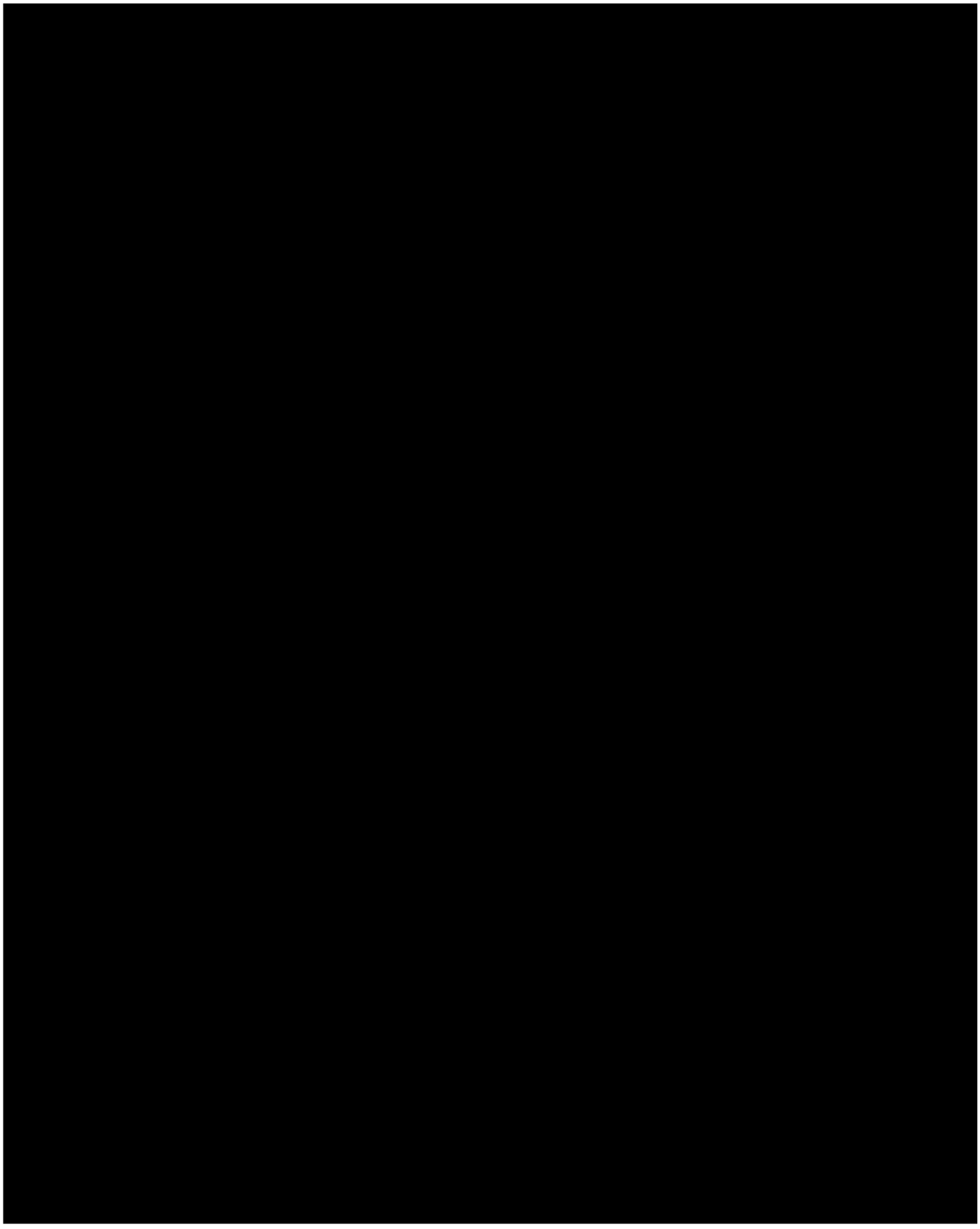
Term	Definition
	used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

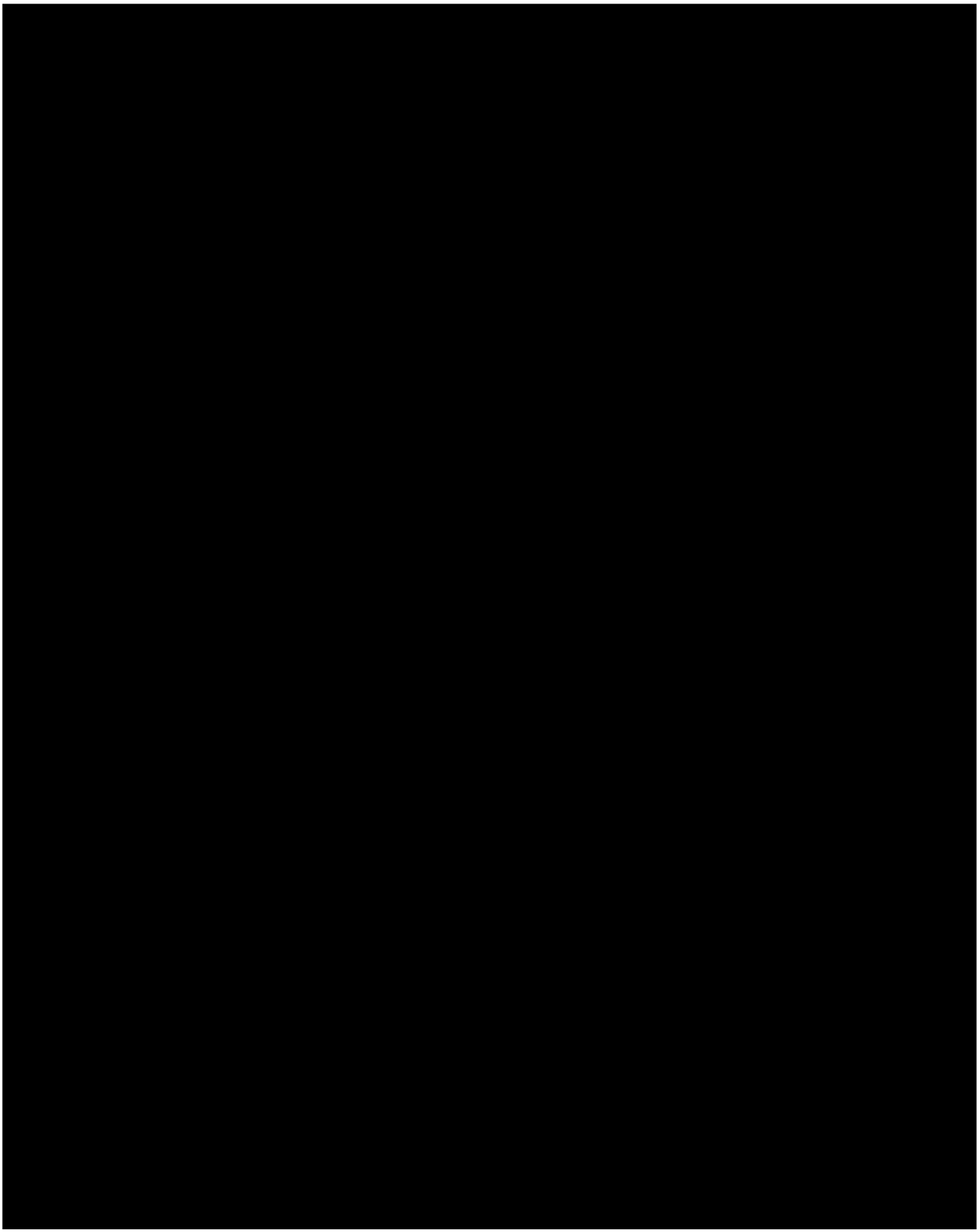


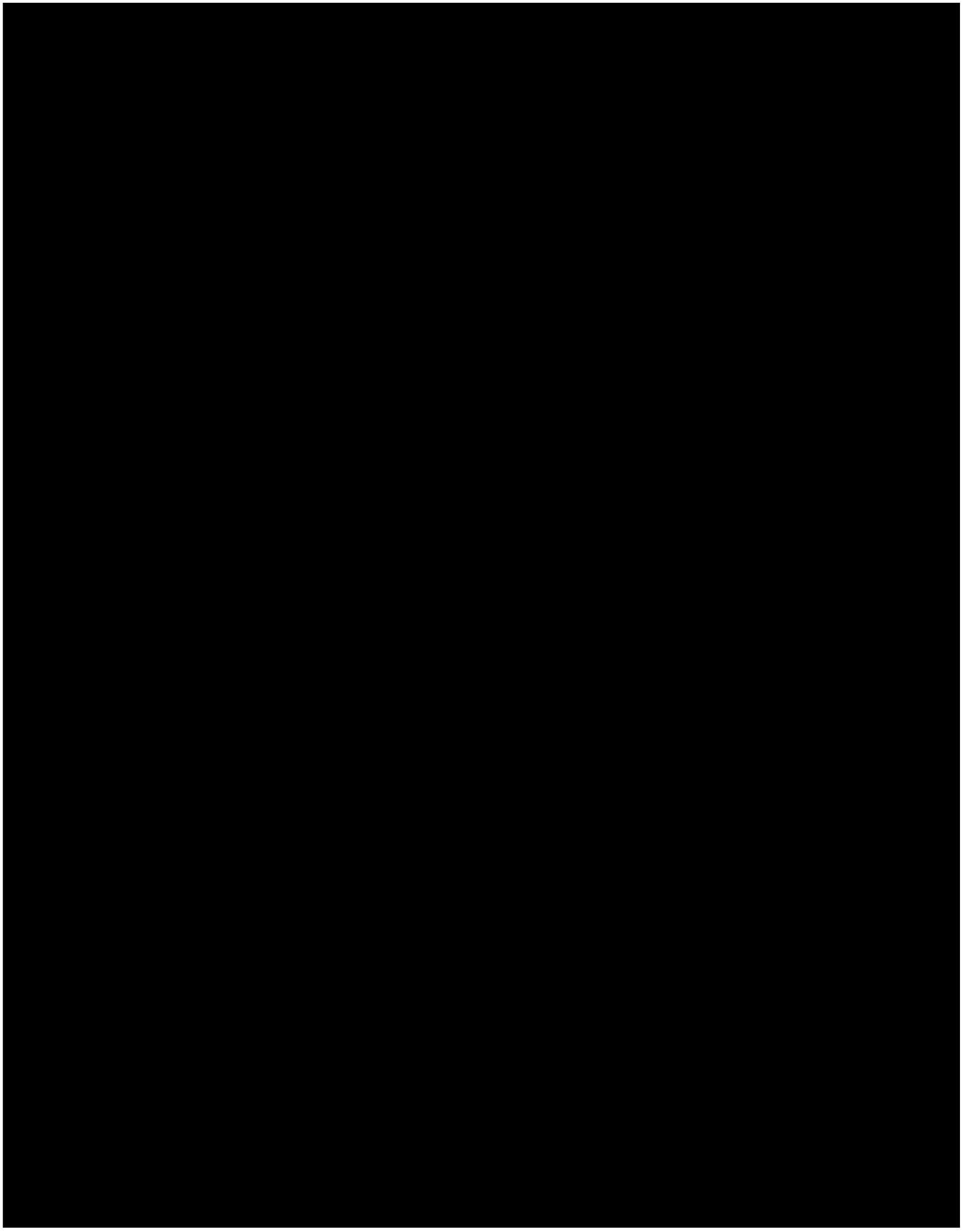


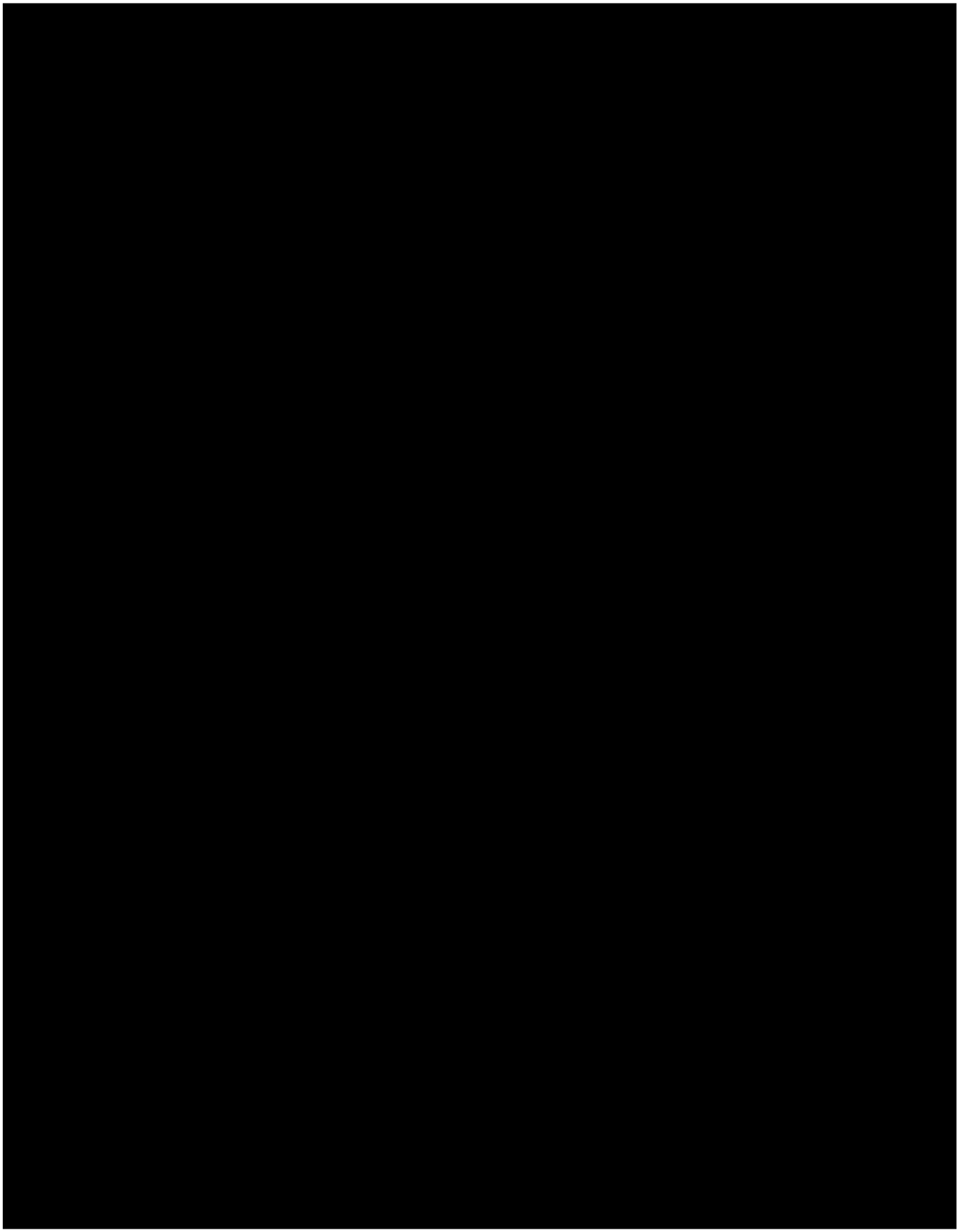


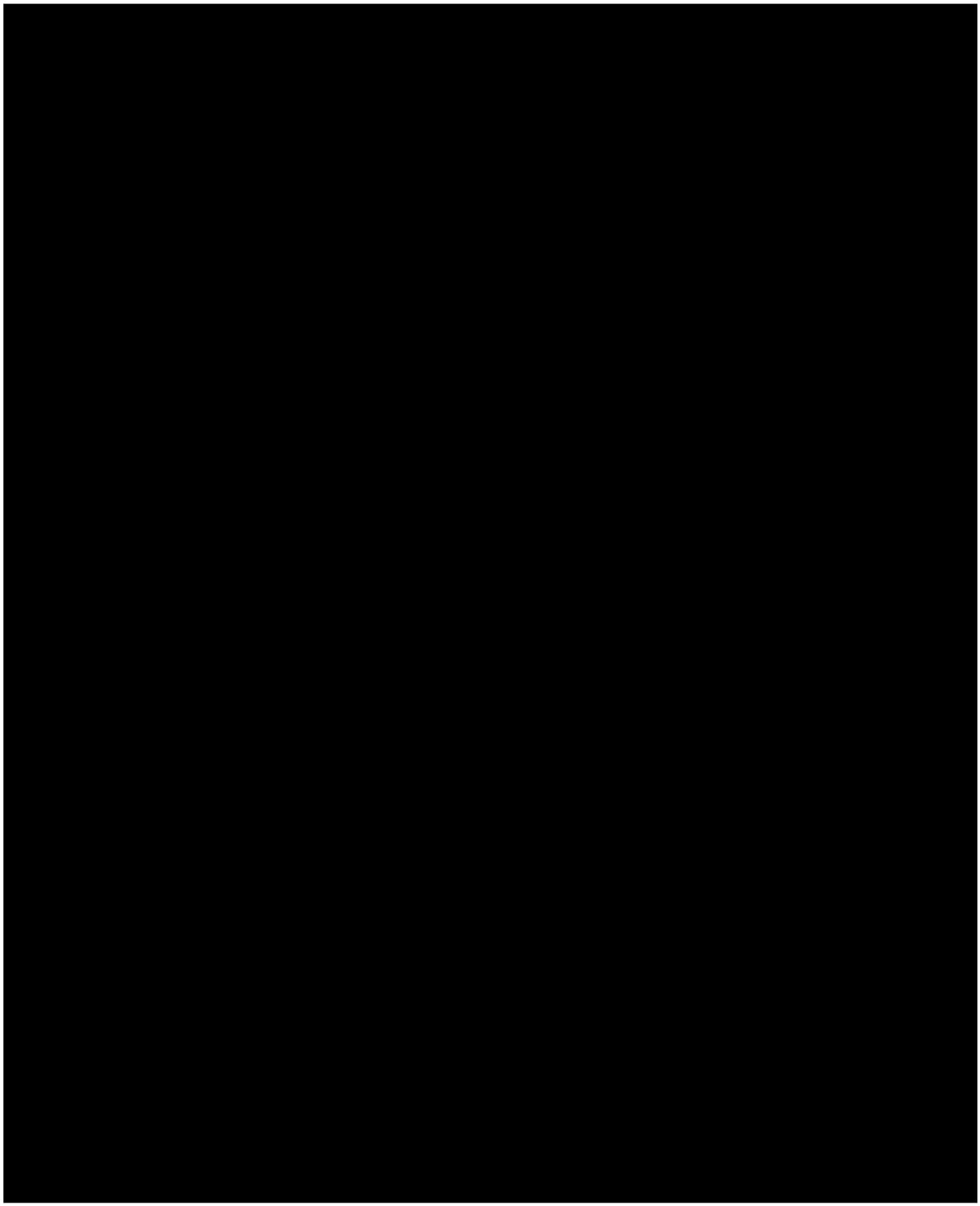


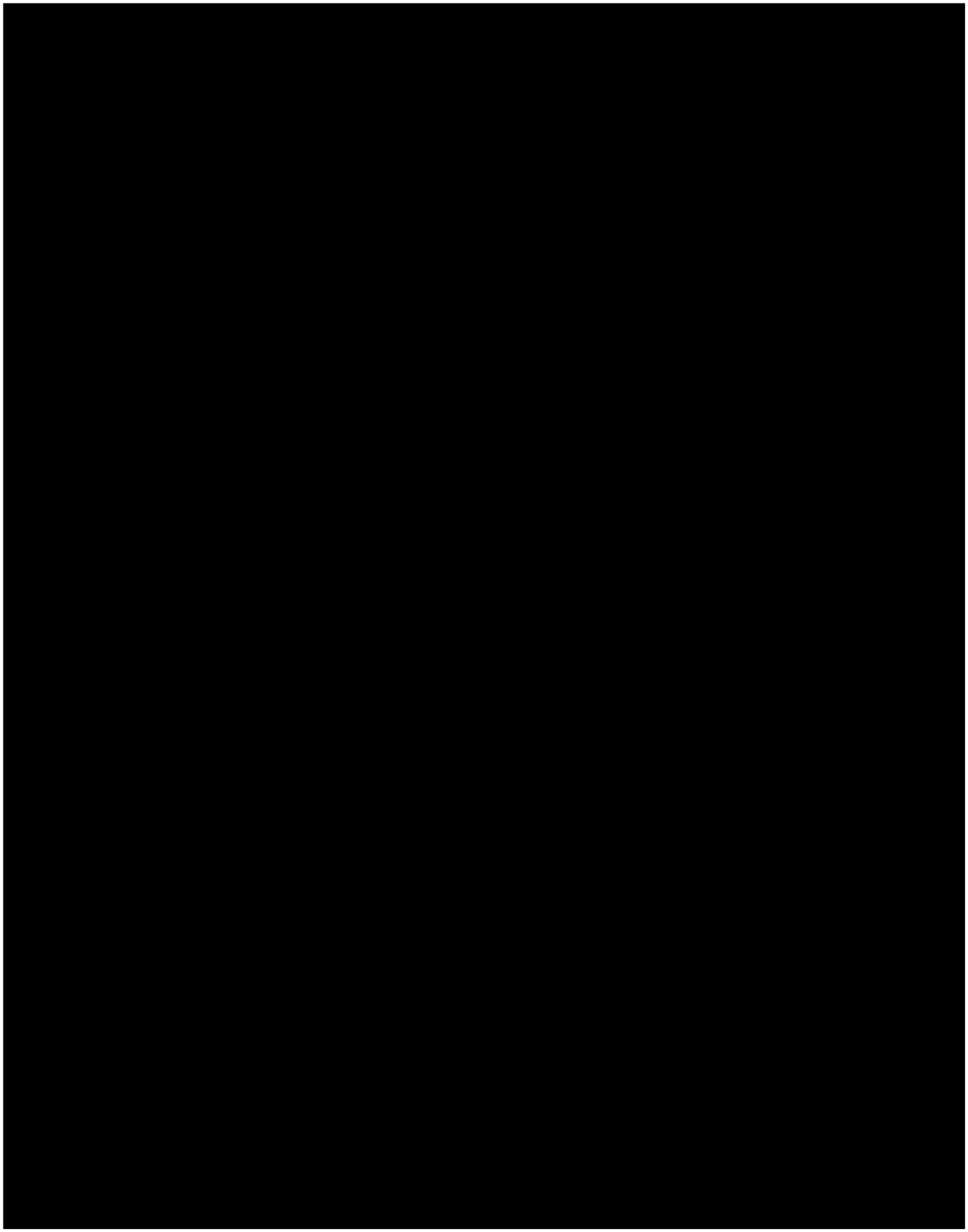


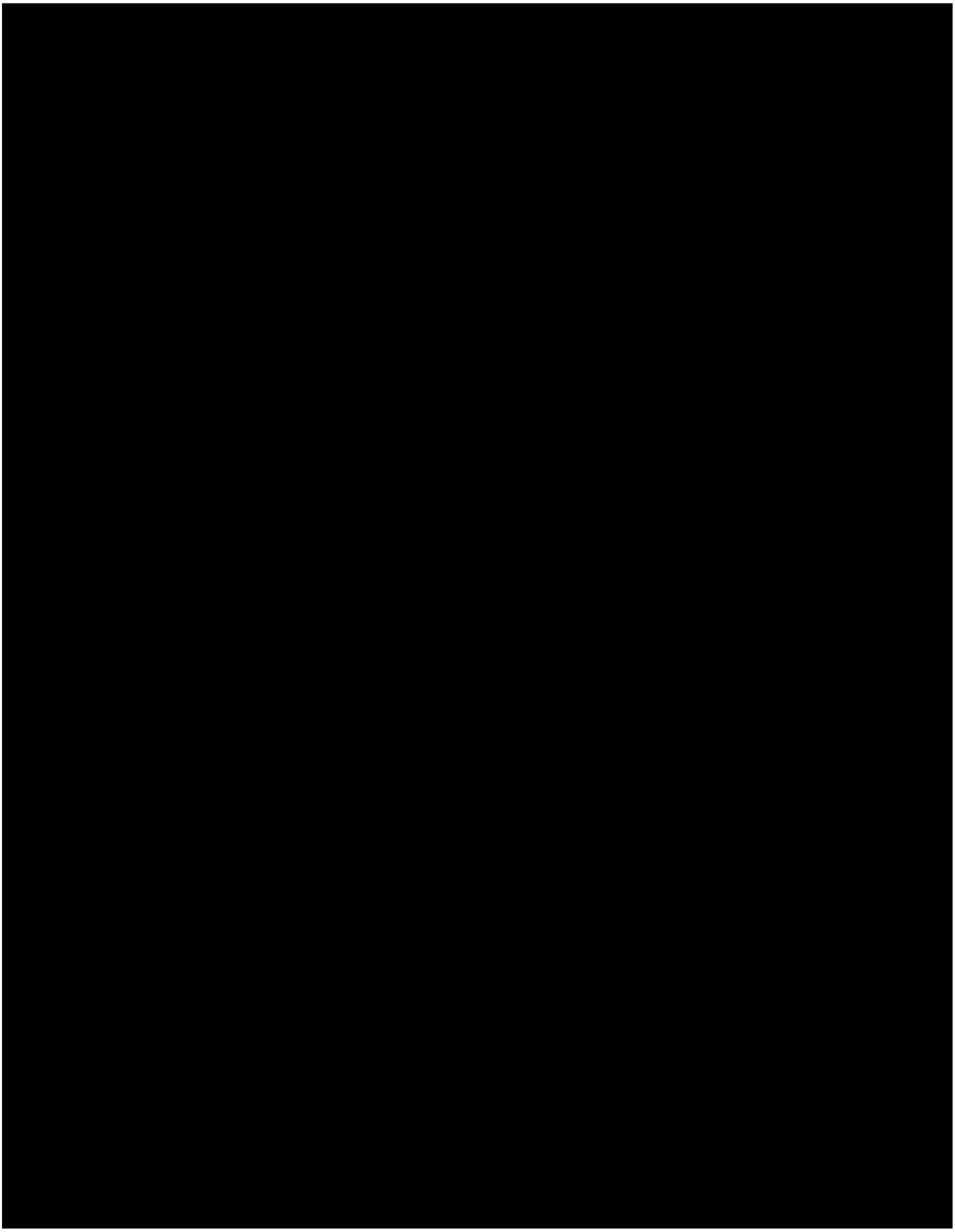


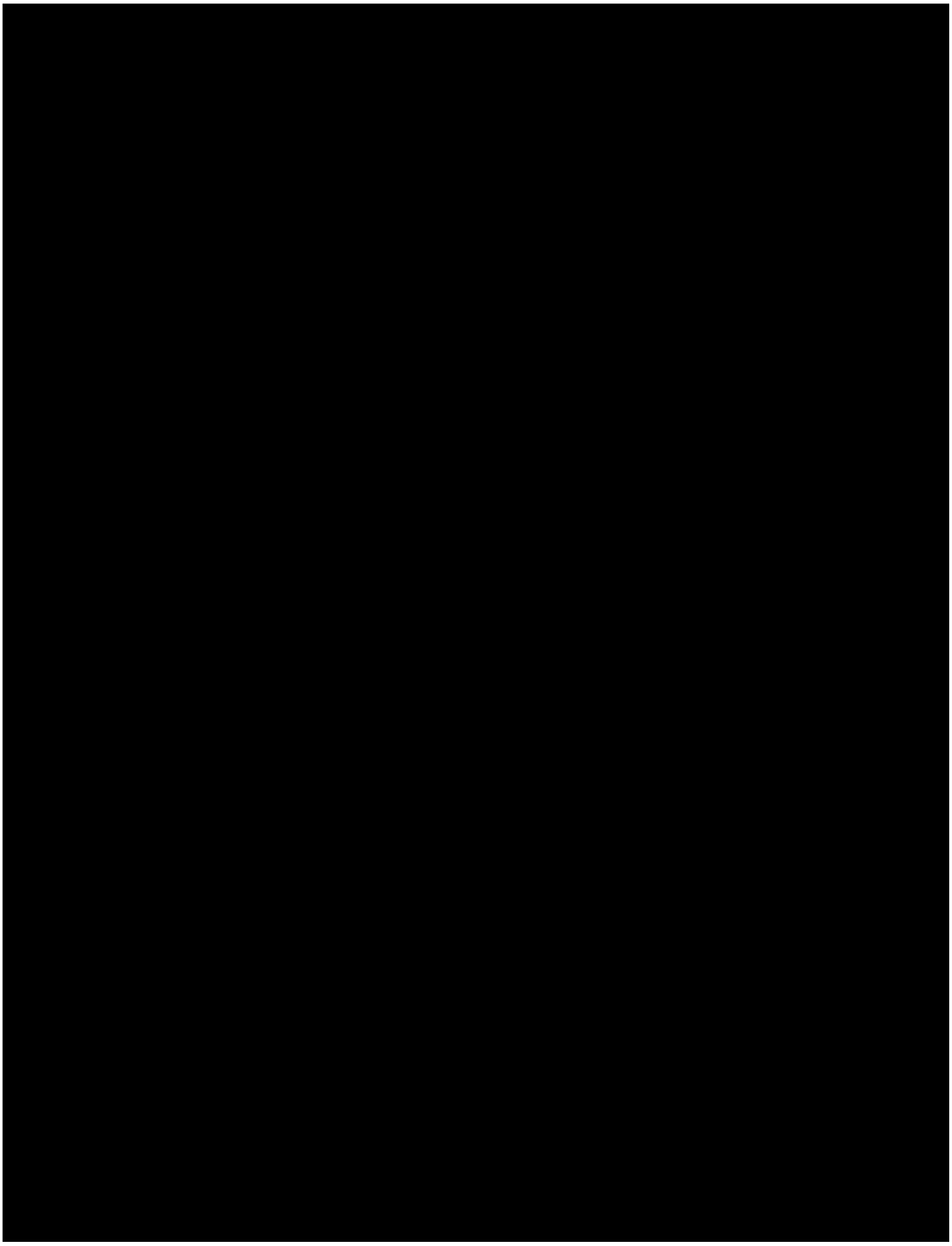


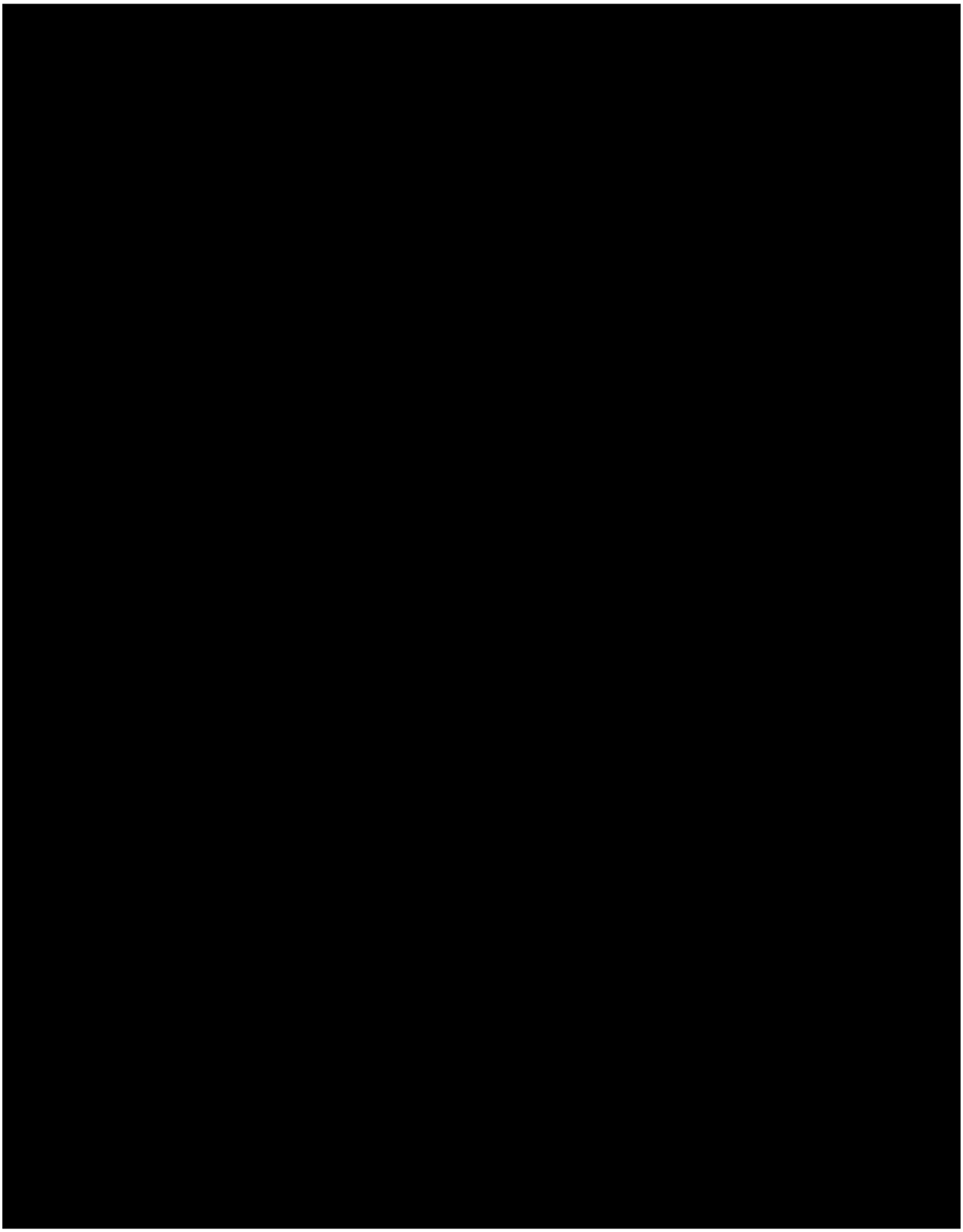












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1.0 APPROVAL AND IMPLEMENTATION SECTION

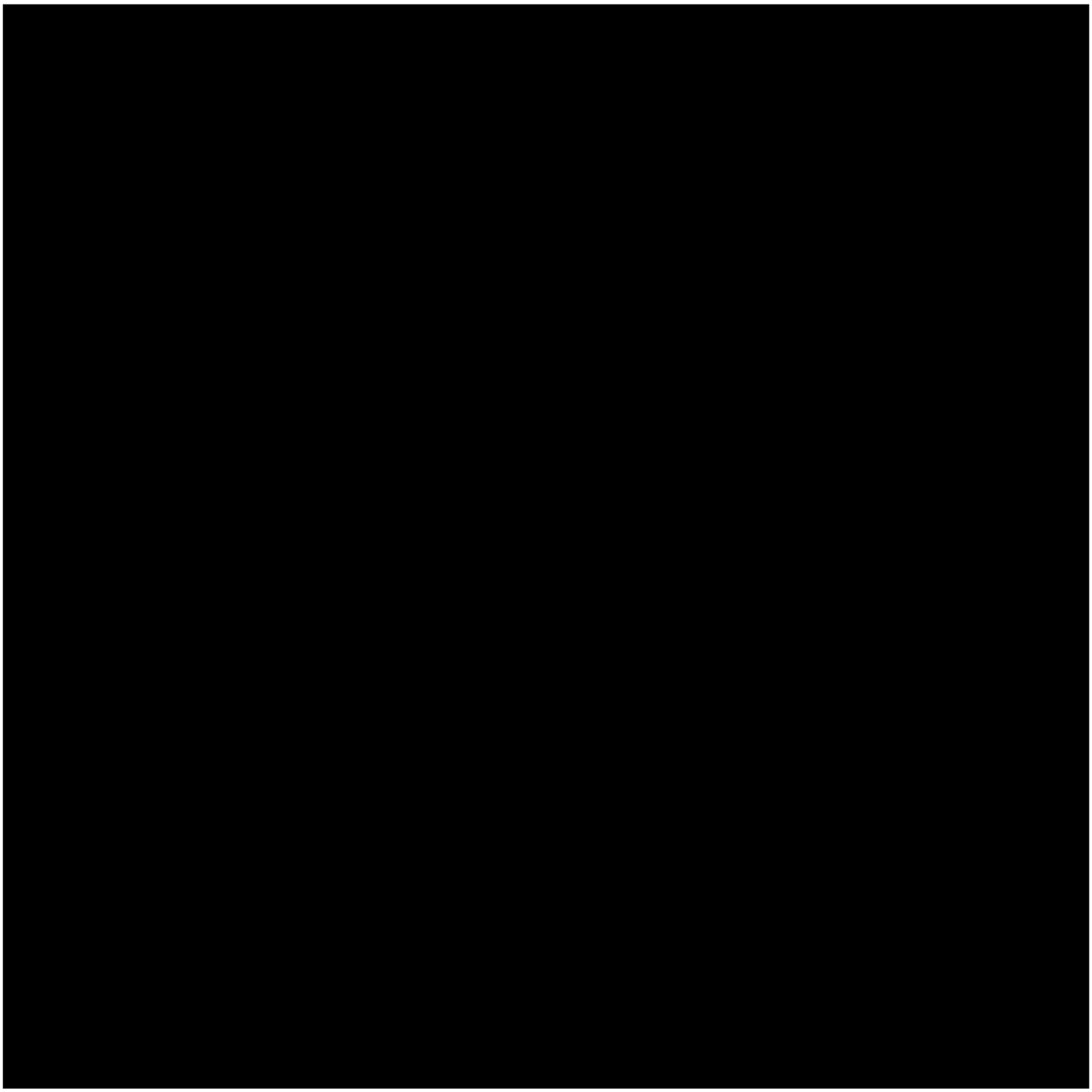
A. Introduction and Applicability

1.1 Introduction

This *Pandemic and Epidemic Annex* provides guidance and direction to Oberon IB specific to pandemic and epidemic planning to address continuity and maintain essential functions and services during those events.

Within this annex and all other EOP documents, **the use of "EOP" refers to the entire suite of** documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

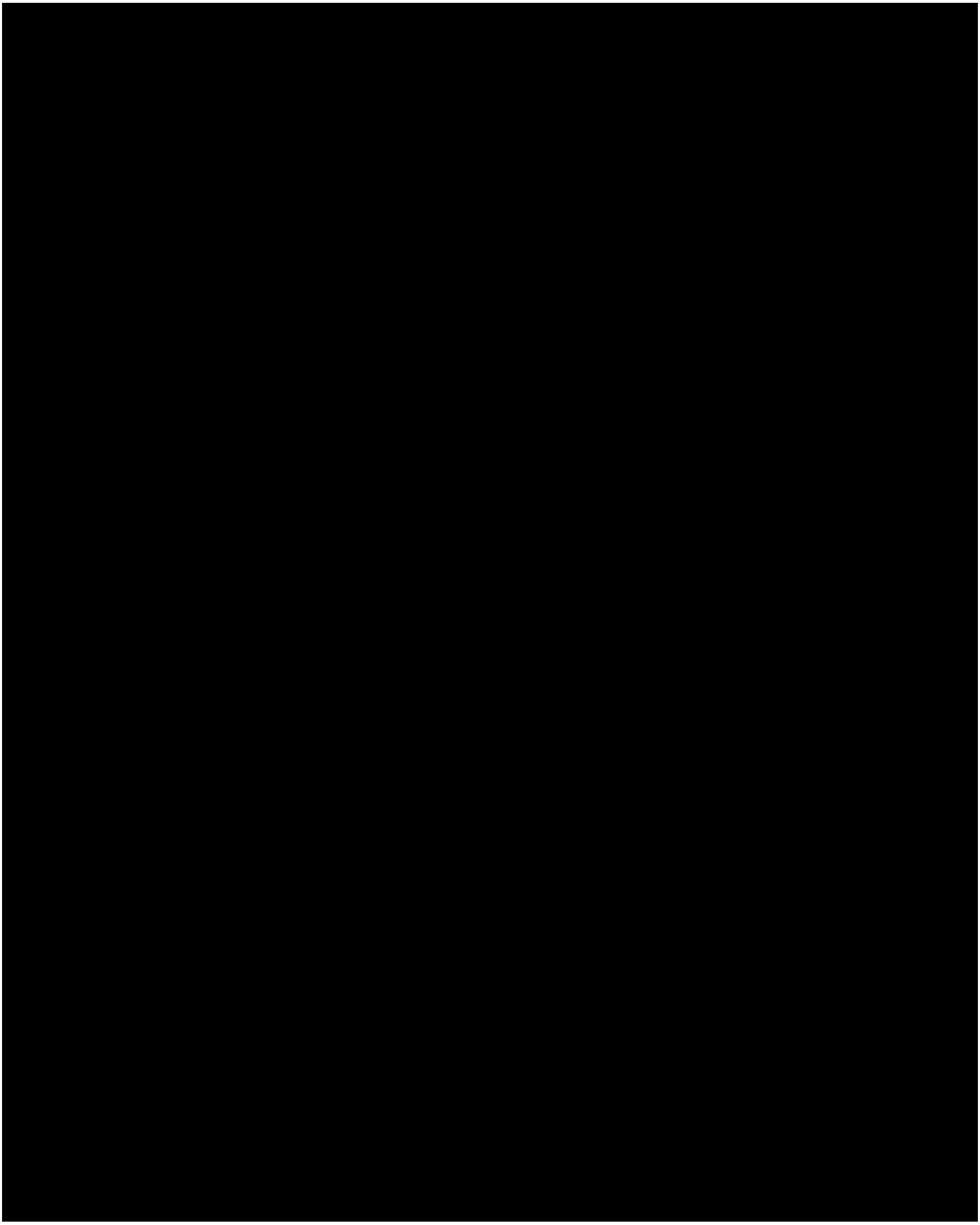


2.0 PANDEMIC THREAT LEVELS

The World Health Organization (WHO) defines a pandemic as a, "worldwide spread of a new disease" where "the impact or severity tends to be higher…in part because of the much larger number of people…who lack pre-existing immunity to a new virus." Examples of recent pandemic events include the H1N1 pandemic in 2009-2010, the Zika virus pandemic in 2016, and the COVID-19-Coronavirus pandemic starting in 2019.

The pandemic threat levels are based on the WHO and US National Alert Stages and have been modified to fit Oberon IB. The pandemic threat levels are based on the level of person-to-person transmission and how widespread the disease is in humans, as measured in the US transmittal rates. Planning and response measures are based on the pandemic threat level. Oberon IB will consult with WHO, the Center for Disease Control (CDC), and the local and state health departments. Attachment 1 contains the Federal Government Response Stages matrix.

Level 0 – Awareness	No documented cases of person-to-person transmission.
Level 1 – Cautionary	Documented person-to-person transmission is rare.
Level 2 – Serious	Limited documented person-to-person transmission (Small Cluster).
Level 3 – Severe	Evidence of widespread person-to-person spread (larger or multiple clusters identified in the US) **AND** Limited person-to-person spread within city.
Level 4 – Critical	Increasing and sustained person-to-person transmission **AND** Multiple clusters of cases identified in two (2) or more countries or regions.



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7.0 RESOURCES AND RELATED DOCUMENTS

Oberon IB Emergency Operations Plan

Oberon IB Hot Weather Annex

Oberon IB Cold Weather Annex

Oberon IB Cyber and Physical Security Incident Annex

Centers for Disease Control

Pandemic resources webpage: https://www.cdc.gov/flu/pandemic-resources/index.htm

National Strategy Planning webpage:

https://www.cdc.gov/flu/pandemic-resources/planning-preparedness/national-strategy-planning.html

NERC COVID-19 webpage: https://www.nerc.com/news/Pages/COVID-19.aspx

World Health Organization

https://www.who.int/emergencies/diseases/en/

Health and Human Services

- **Pandemic Influenza Preparedness Response and Recovery Guide for Critical Infrastructure and Key Resources**

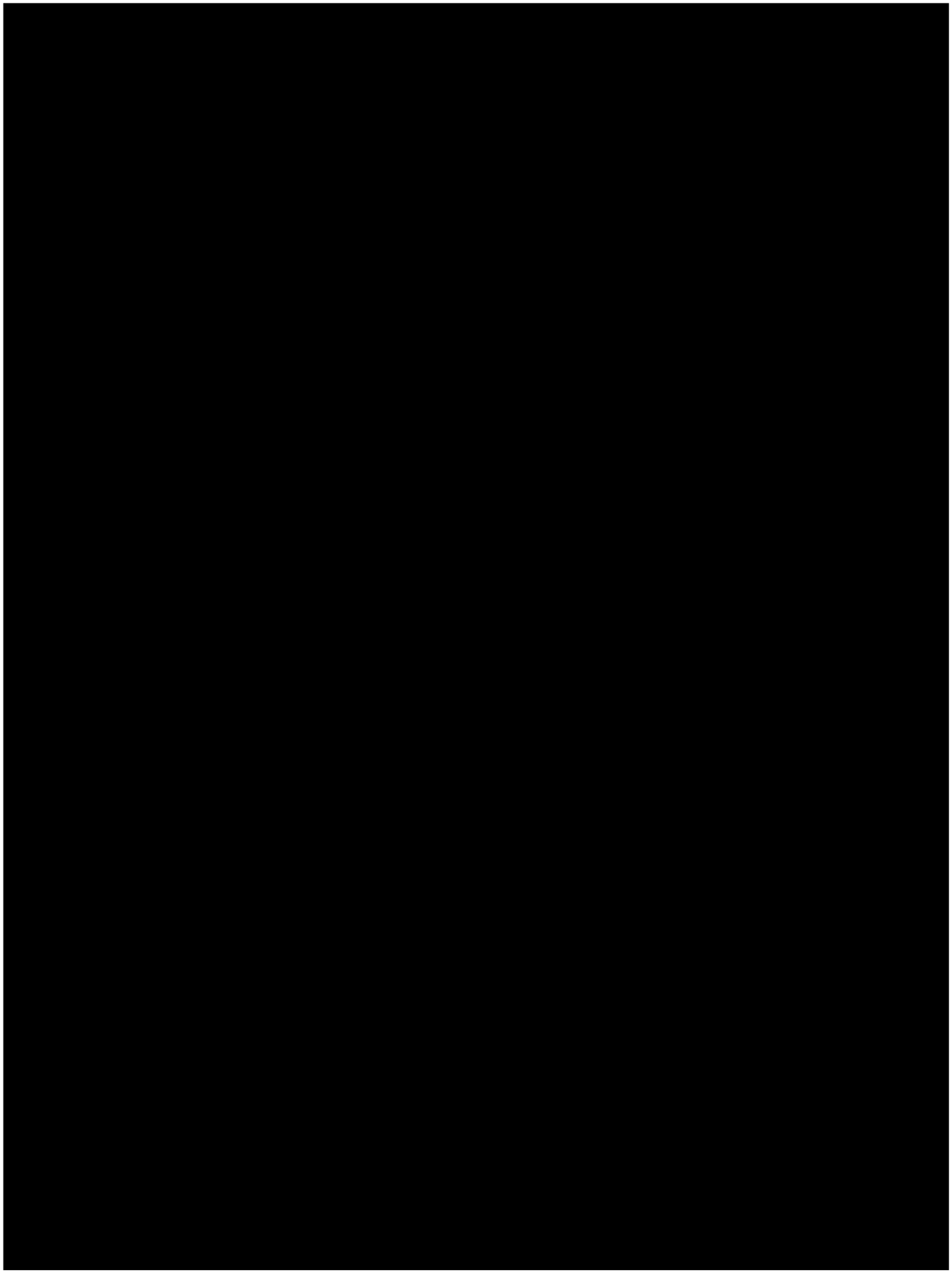
https://asprtracie.hhs.gov/technical-resources/resource/1978/pandemic-influenza-preparedness-response-and-recovery-guide-for-critical-infrastructure-and-key-resources

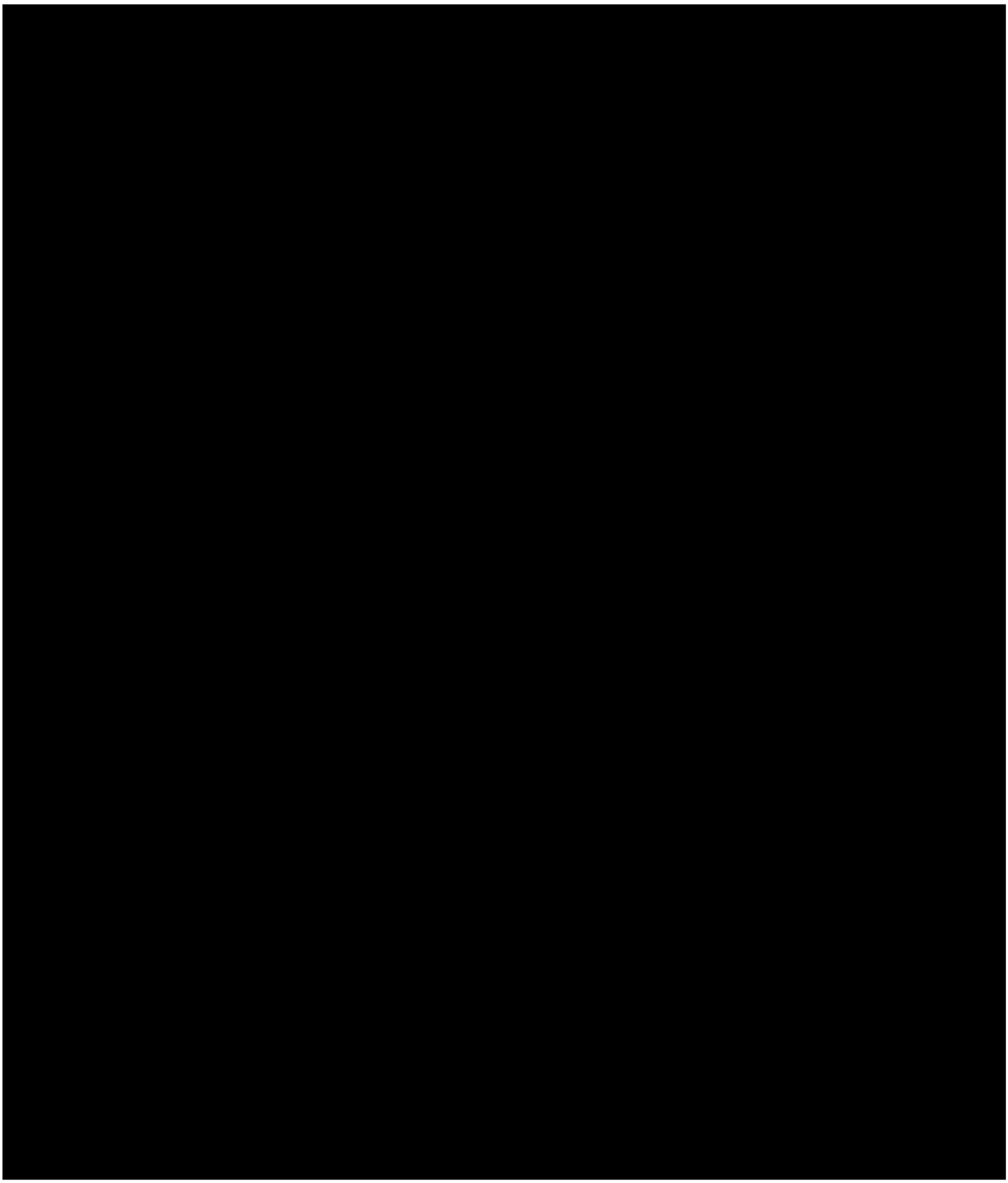
Texas Health and Human Services – Health Alerts & Advisories webpage:
https://dshs.texas.gov/news/alerts.aspx

Ector County Public Health webpage:
http://www.co.ector.tx.us/page/ector.HealthDepartment

8.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity **employed to test an entity's EOP or a portion of an entity's EOP. A drill** may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.





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1.0 APPROVAL AND IMPLEMENTATION SECTION

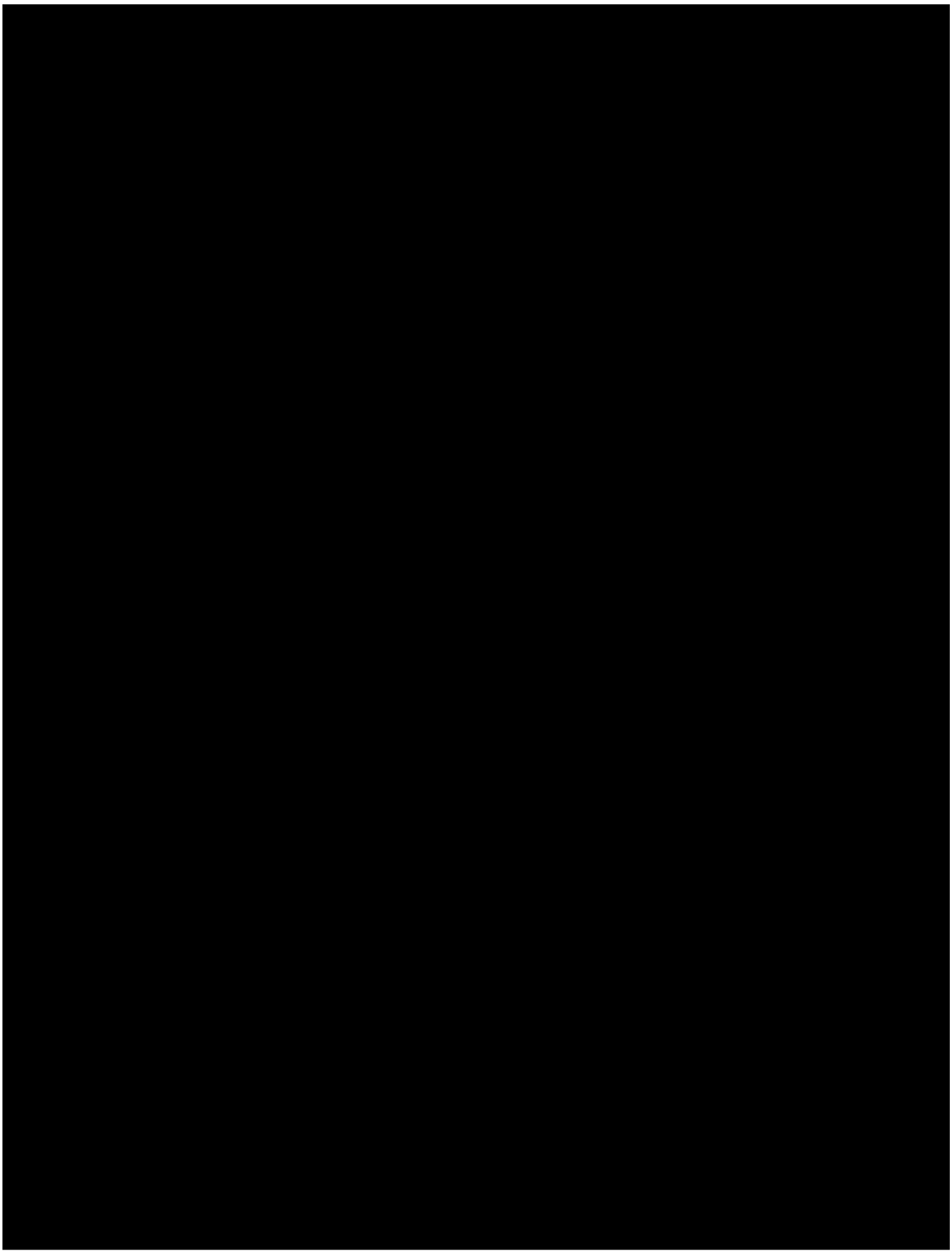
A. Introduction and Applicability

1.1 Introduction

This *Hot Weather Annex* provides guidance and direction to Oberon IB specific to hot weather operations, planning, and emergency response and includes plans for responding to a hot weather emergency and checklists for Oberon IB to use during a hot weather emergency that includes lessons learned from past weather emergencies to ensure that necessary supplies and personnel are available through the weather emergency.

Within this annex **and all other EOP documents, the use of "EOP" refers to the entire suite of** documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

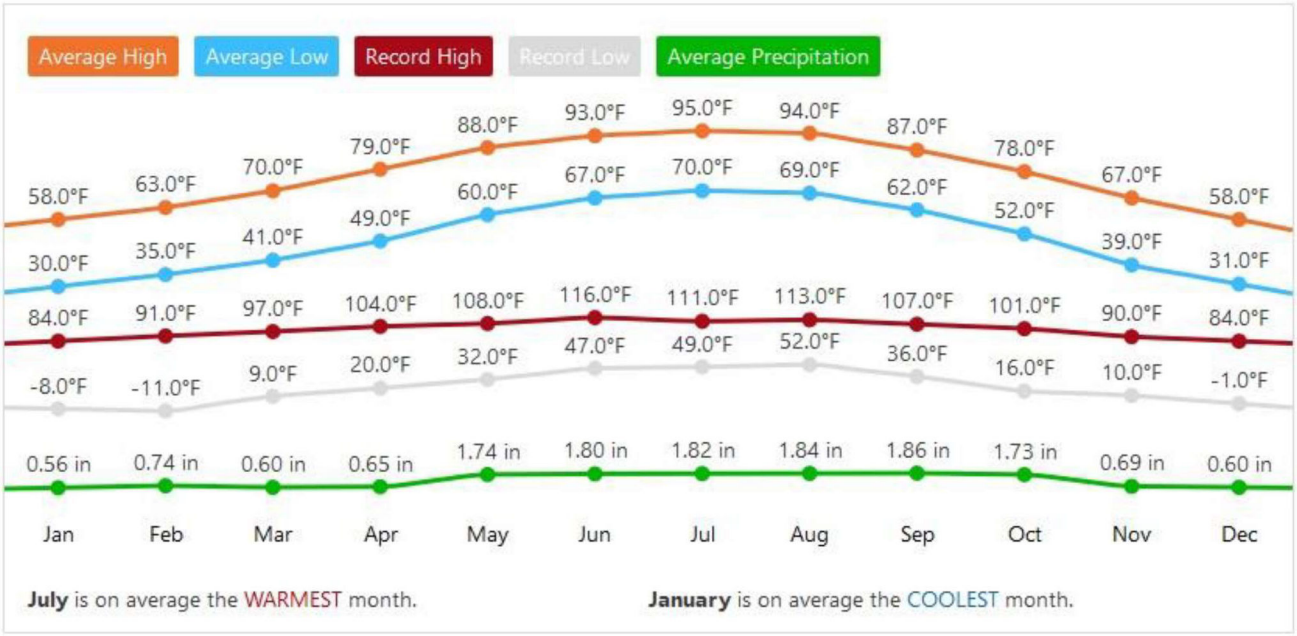


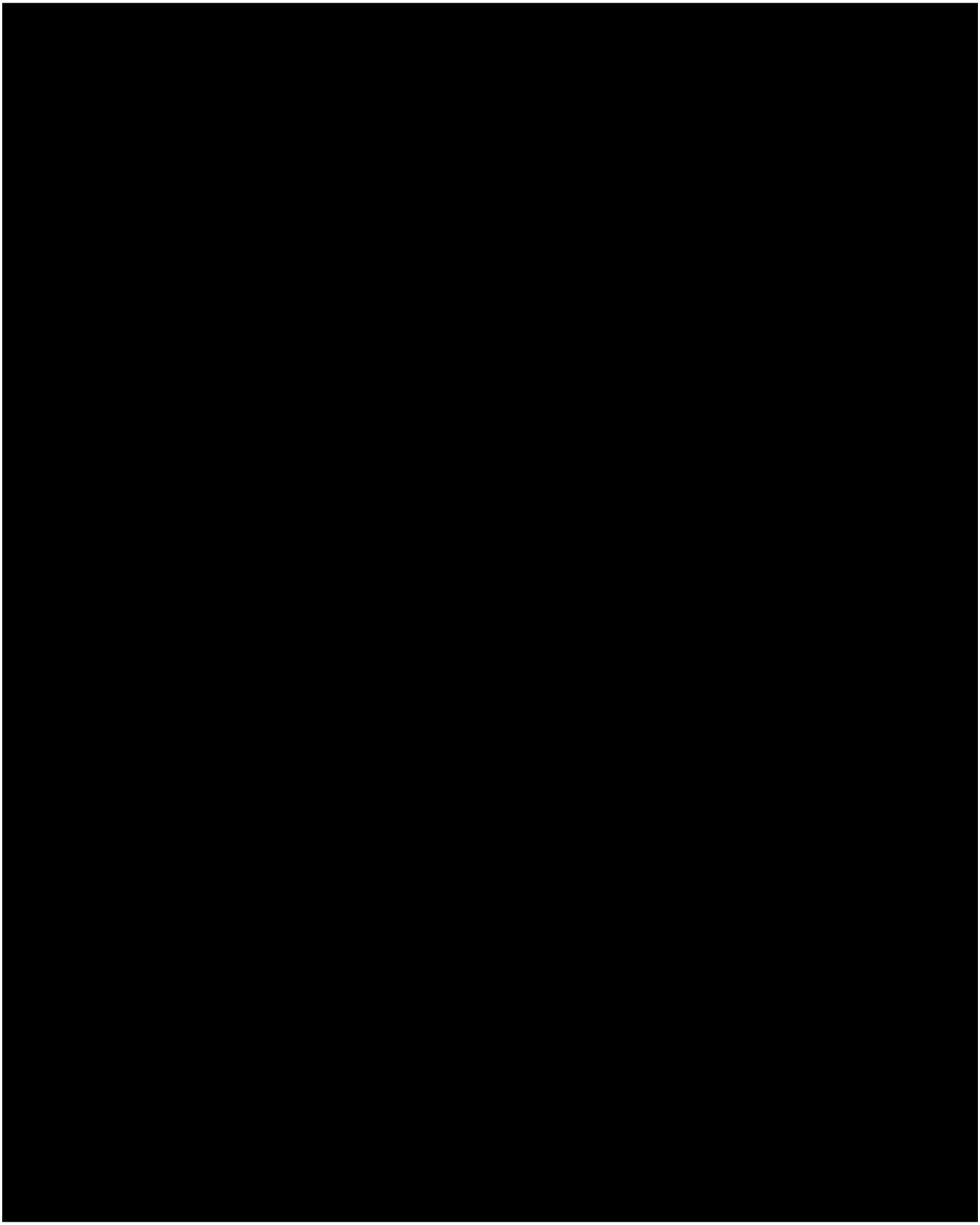
2.0 LOCAL CONDITIONS

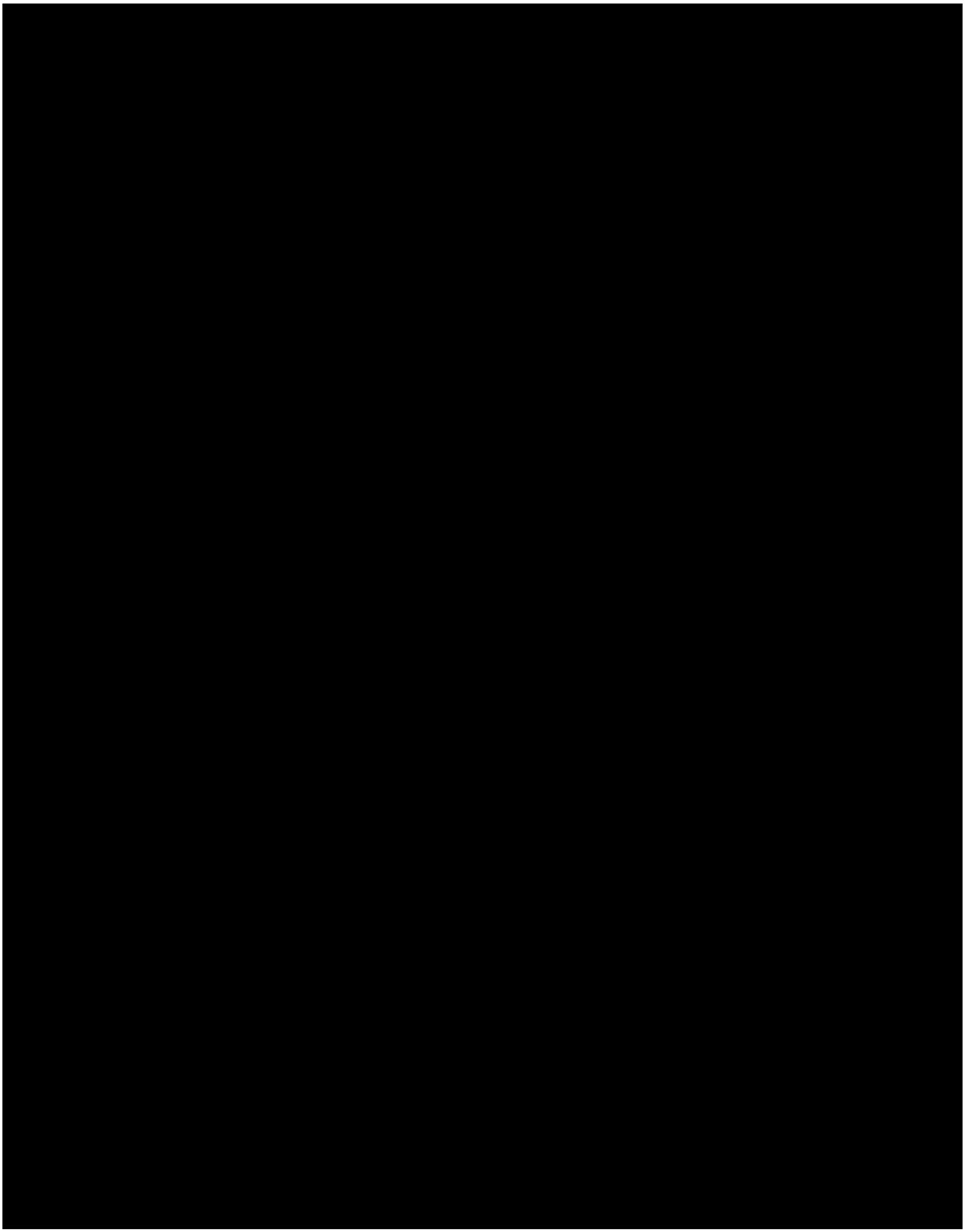
Odessa, TX, which is approximately 26 miles northeast of the facility site, is used for comparison of the local facility conditions[1]. The average high temperature during extended summer months of June through September is 92.25 degrees Fahrenheit, with recorded temperatures as high as 116 degrees Fahrenheit.

[continued on next page]

[1] https://weather.com/weather/monthly/l/836be8e0ffcc79186defe3e98d20ed77f278066fcdb03d2f5a0339fd797aa52f







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7.0 HEAT-RELATED SAFETY INFORMATION

7.1 Personnel Safety

Personnel safety during extreme hot weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Personnel will stay informed of potential severe weather events and utilize the information in this annex to respond. Job safety briefings will be conducted as needed during preparation for and in response to extreme hot weather events.

7.2 Heat Exhaustion

7.2.1 Signs and symptoms of heat exhaustion:

- Heavy sweating
- Weakness
- Cold, pale, clammy skin
- Fast, weak pulse
- Nausea or vomiting
- Fainting

7.2.2 Response to a heat exhaustion illness should include the following actions:

- Move to a cooler location
- Lie down and loosen clothing
- Apply cool, wet clothes to as much of your body as possible
- Sip water

Seek immediate medical attention by calling 911 if you experience vomiting or if your symptoms get worse or last longer than an hour.

7.3 Heat Stroke

Heat stroke is a condition in which your body is unable to adequately cool any longer.

7.3.1 Signs of heat stroke include:

- High body temperature (103oF or higher)
- Hot, red, dry, or damp skin
- Headache
- Dizziness
- Nausea
- Confusion
- Loss of Consciousness

7.3.2 Response to heat stroke should include the following actions:

- Contact Emergency Services by calling 911 if you suspect heat stroke
- Move person to a cooler place.
- **Help lower the person's temperature with cool cloths or a cool bath**.
- DO NOT give the person anything to drink.

7.4 Safety Procedures

7.4.1 During extreme hot weather events, facility personnel should adhere to the following procedures:

7.4.1.1 Review heat stress training and related illness signs and symptoms with all personnel at least on a monthly basis during the summer months and prior to any extreme hot weather event.

7.4.1.2 Take breaks in air-conditioned spaces.

7.4.1.3 Wear loose, lightweight, light-colored clothing.

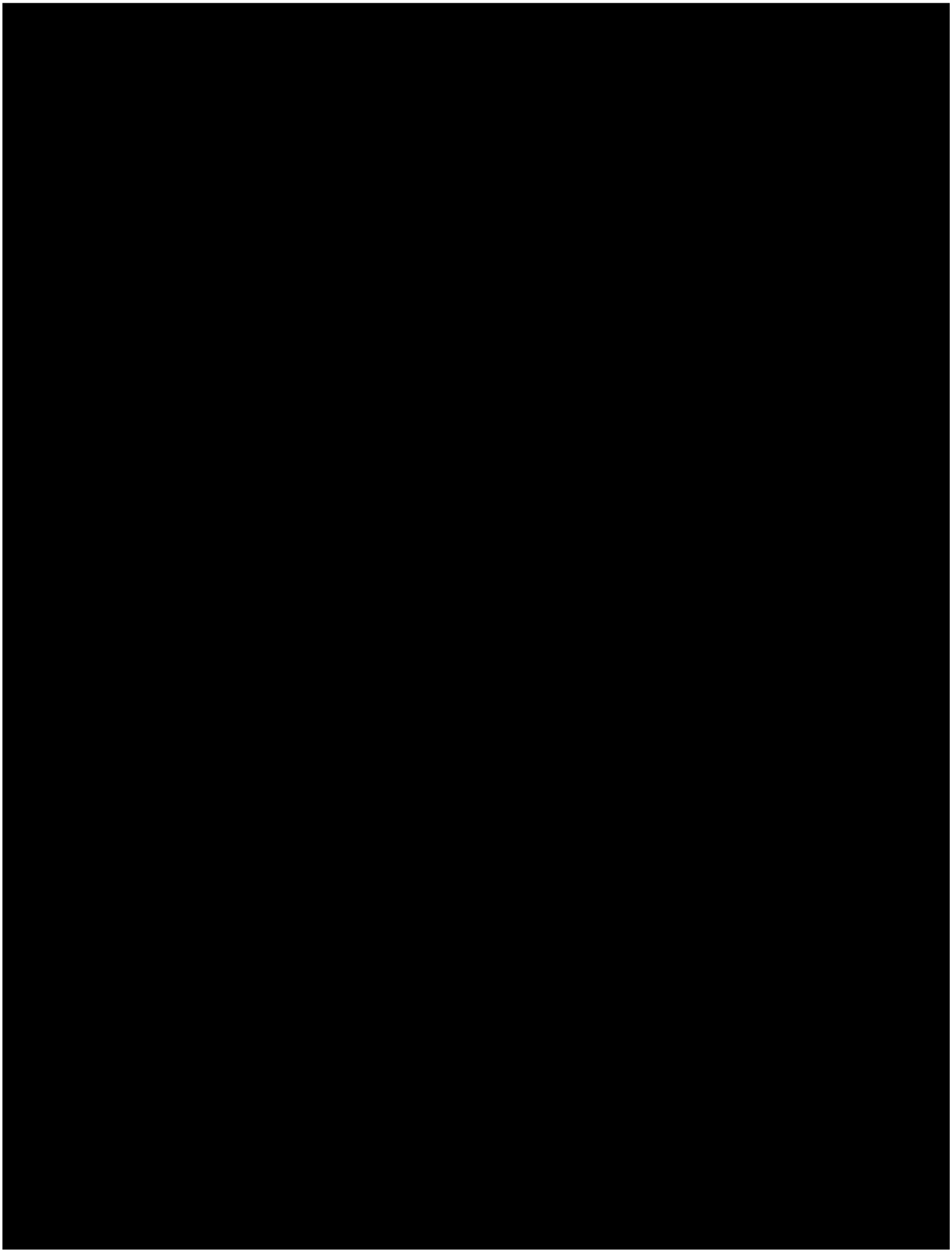
7.4.1.4 Wear hats when working outdoors.

7.4.1.5 Wear and reapply sunscreen as indicated on the package.

7.4.1.6 Regularly drink water to remain hydrated (two to four 8-ounce cups of water every hour while working).

7.4.1.7 Where possible, schedule outdoor work for earlier or later in the day to avoid the hottest part of the day.

7.4.1.8 Seek medical care immediately if you or a co-worker shows symptoms of heat-related illness.



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10.0 ERCOT ANNUAL SUMMER WEATHER DECLARATION SUBMITTAL

10.1 ERCOT Requirement for Annual Summer Weatherization Declaration Submittal

10.1.1 Oberon IB must submit a declaration between **May 1 and June 1** that it has completed or will complete all weather preparations required by this Plan for equipment critical to the reliable operation of the Generation Resource during the summer time period (June through September).

10.1.2 Oberon IB will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

11.0 RESOURCES AND RELATED DOCUMENTS

Oberon IB Emergency Operations Plan

Oberon IB Cold Weather Annex

Oberon IB Cyber and Physical Security Incident Annex

Oberon IB Pandemic and Epidemic Annex

ERCOT

Current Protocols - Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment K: Declaration of Completion of Generation Resource Summer Weatherization Preparations and Natural Gas Pipeline for Resource Entities with Natural Gas Generation Resources**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

12.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
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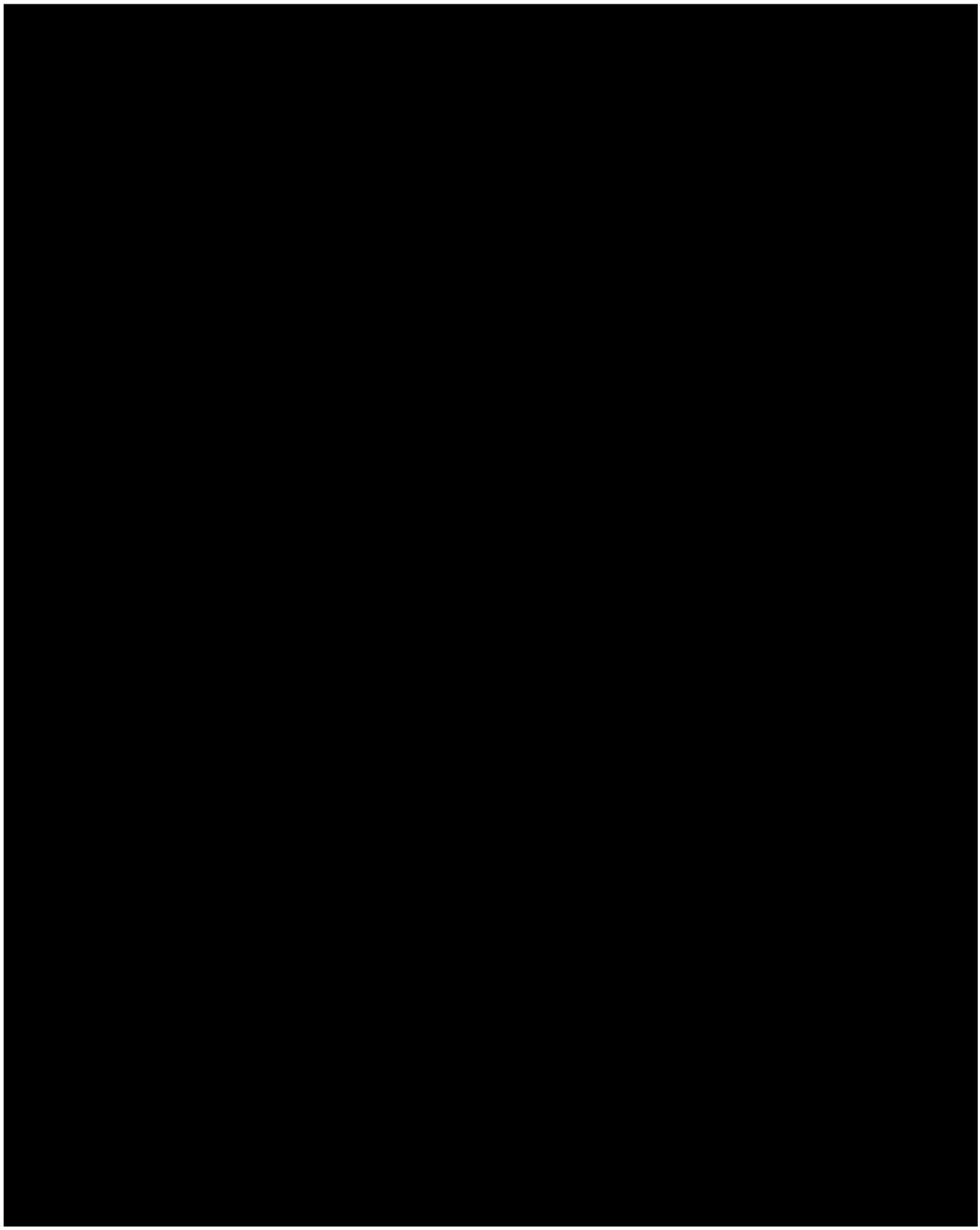

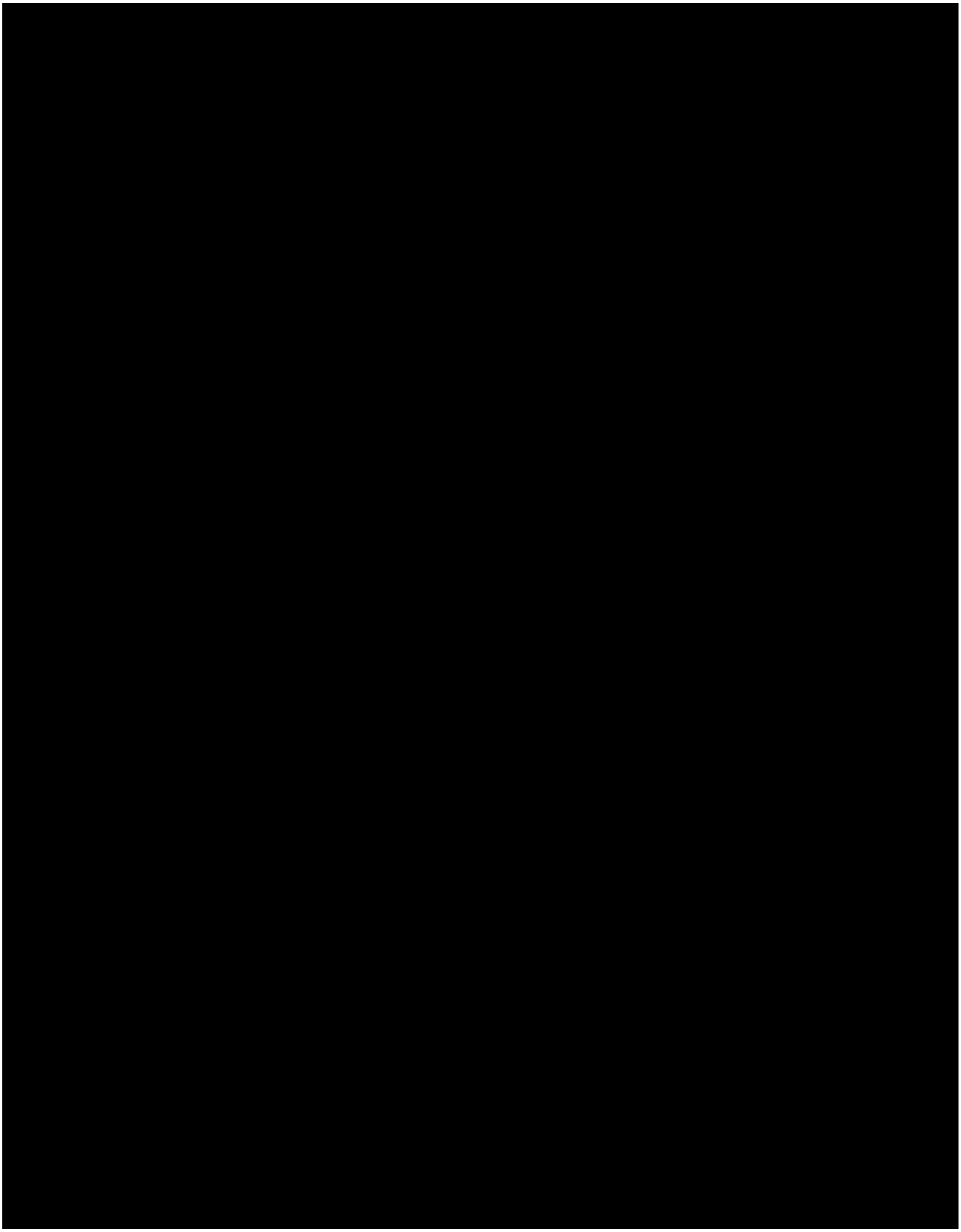

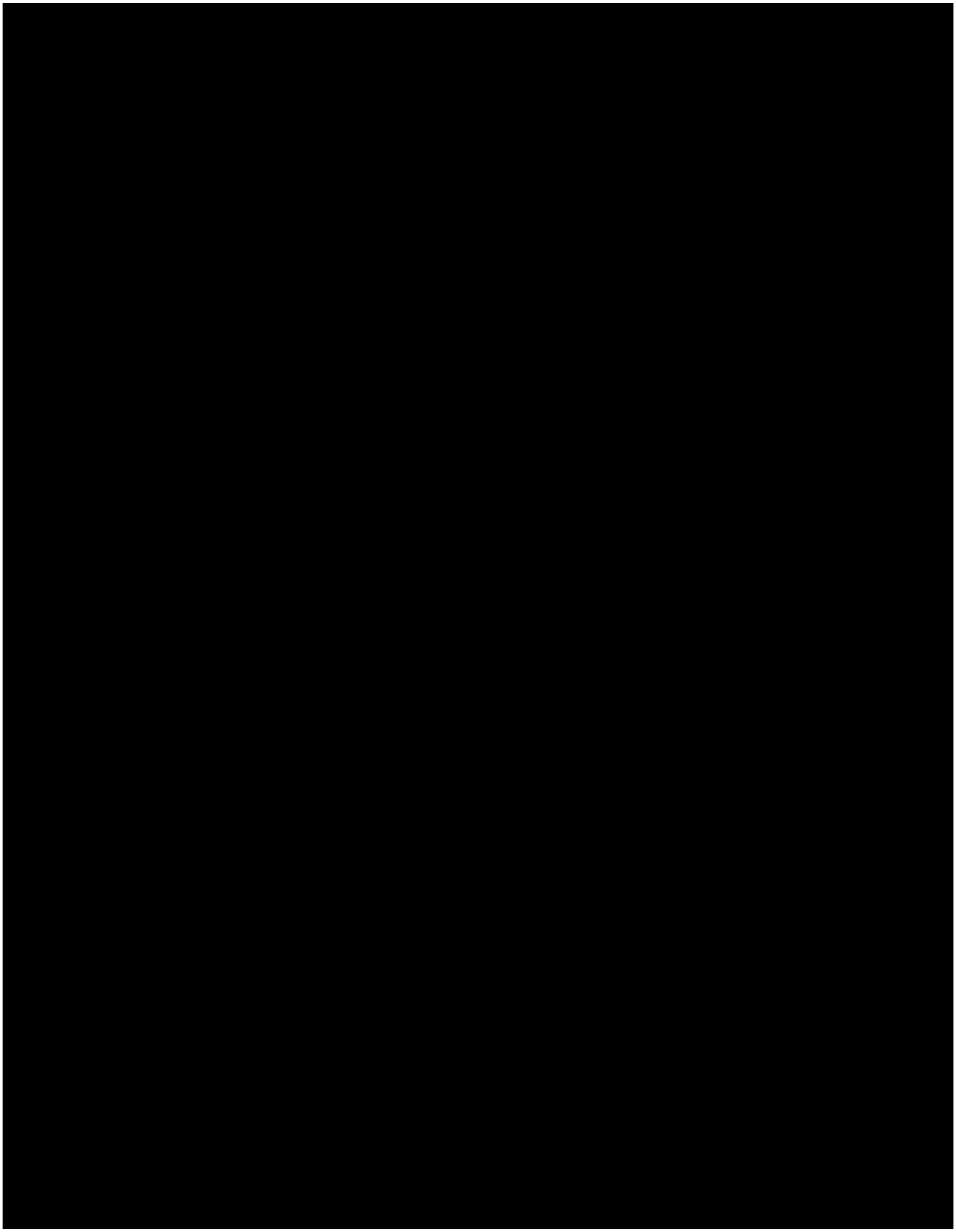

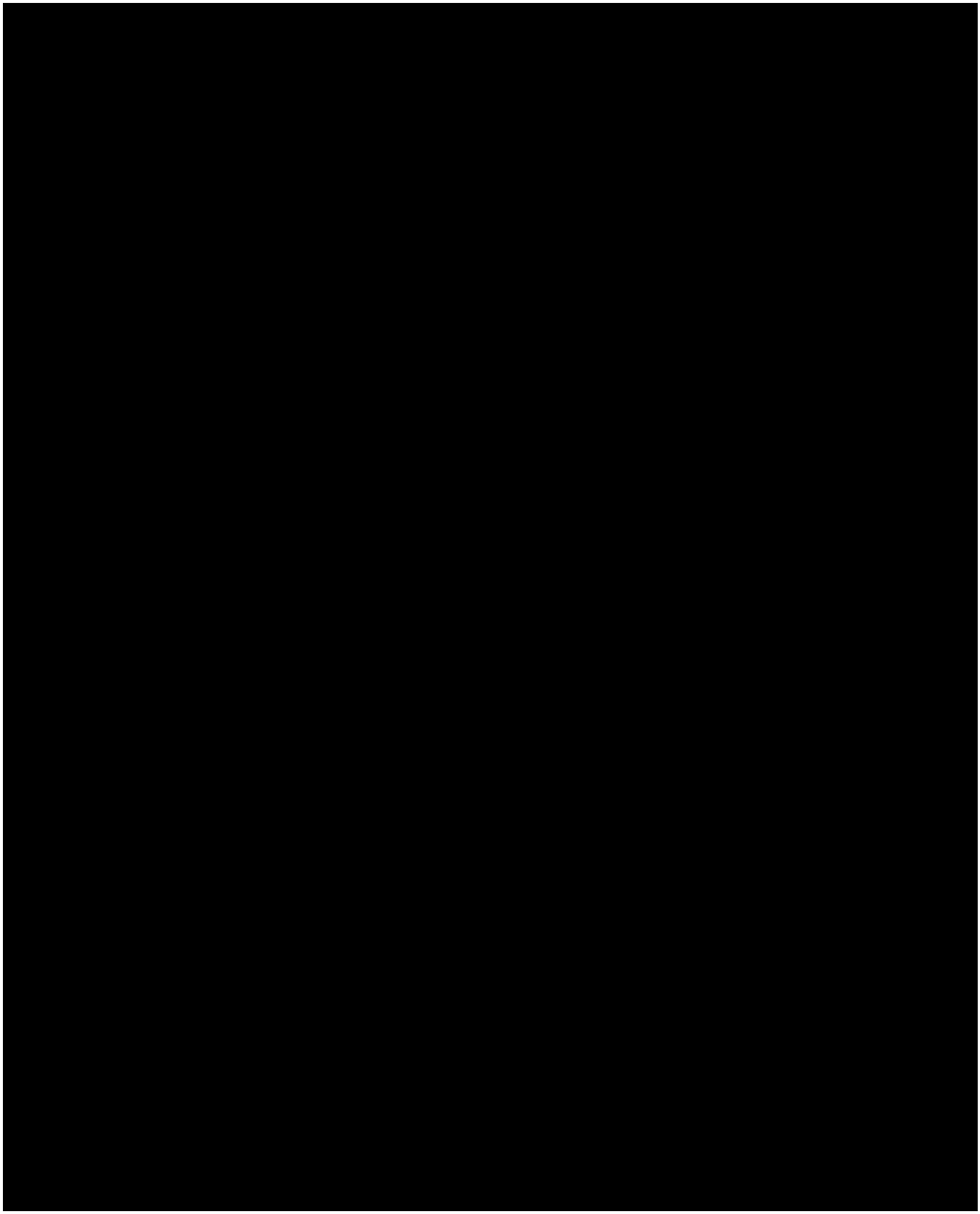

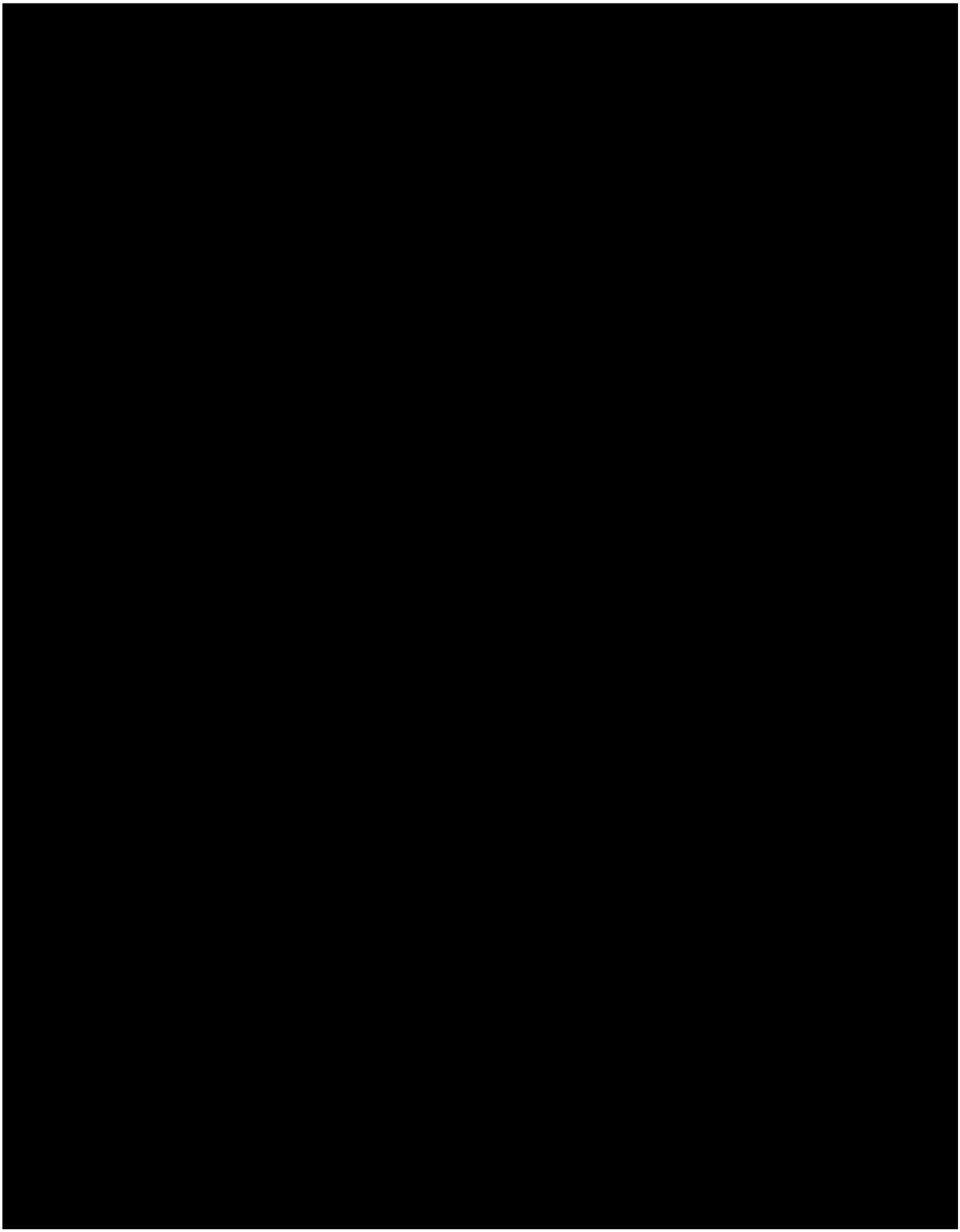

[16] Consult with Safety department on specific gear required

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1.0 APPROVAL AND IMPLEMENTATION SECTION

A. Introduction and Applicability

1.1 Introduction

This *Cold Weather Annex* provides guidance and direction to Oberon IB specific to cold weather operations, planning, and emergency response and includes plans for responding to a cold weather emergency and checklists for Oberon IB to use during a cold weather emergency that includes lessons learned from past weather emergencies to ensure that necessary supplies and personnel are available through the weather emergency.

Within this annex **and all other EOP documents, the use of "EOP" refers to the entire suite of** documents that address the PUCT requirements, which includes relevant Annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.

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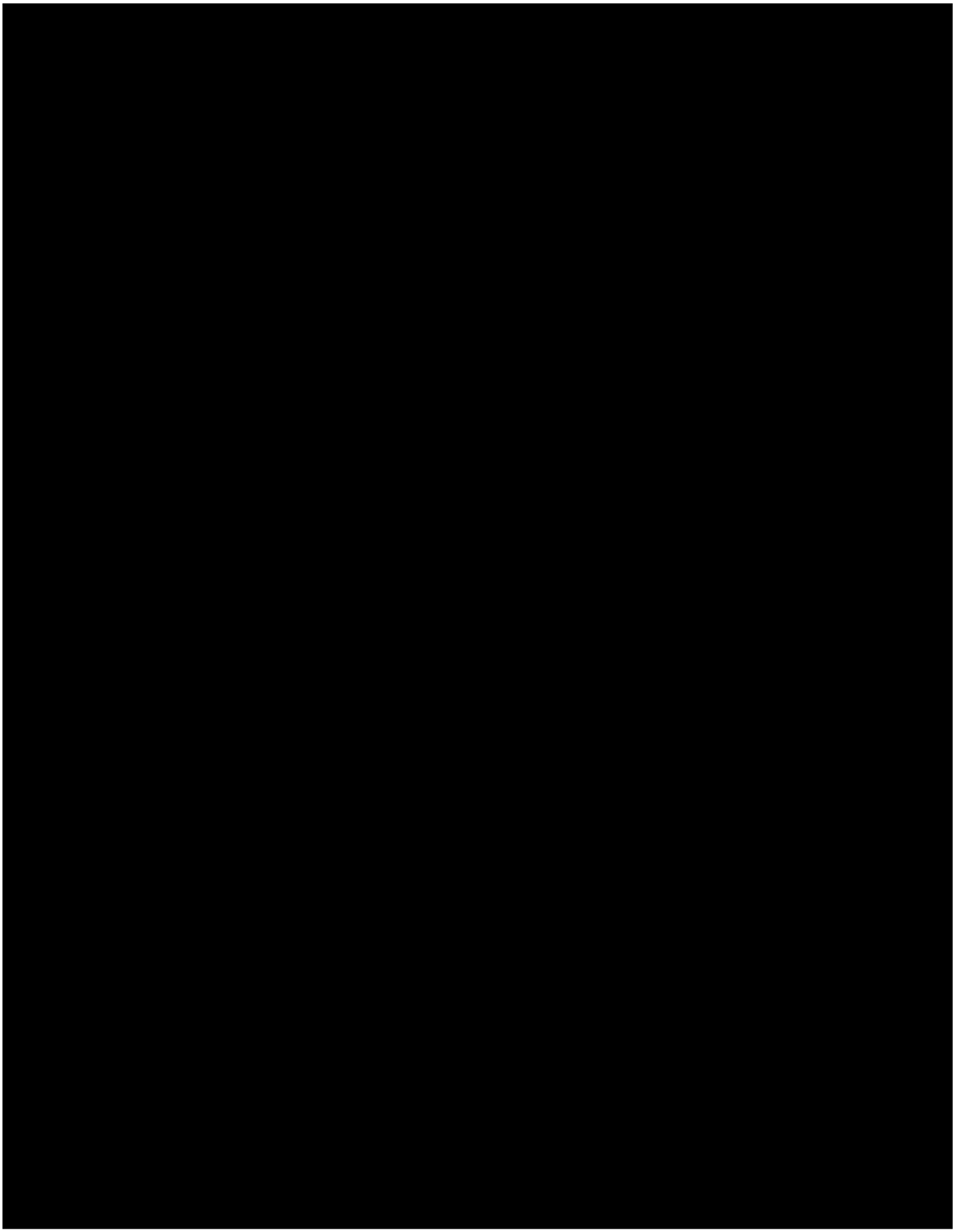
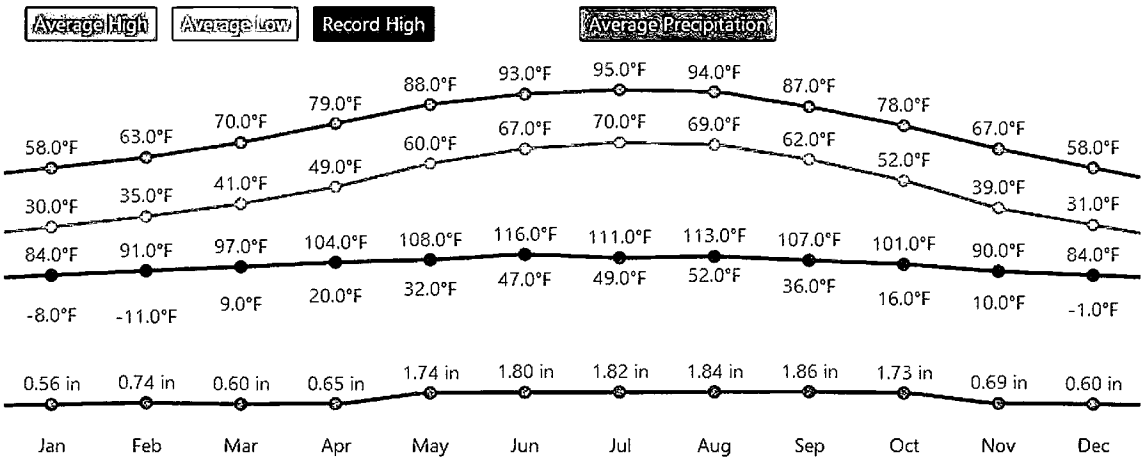


2.0 LOCAL CONDITIONS

Odessa, Texas, which is approximately 26 miles northeast of the facility site, is used for comparison of the local facility conditions[1]. The average high temperature during extended Winter months of November through February is 33.75 degrees Fahrenheit, with recorded temperatures as high as 116 degrees Fahrenheit.

[continued on next page]

[1] https://weather.com/weather/monthly/l/836be8e0ffcc79186defe3e98d20ed77f278066fcdb03d2f5a0339fd797aa52f



July is on average the WARMEST month.

January is on average the COOLEST month.

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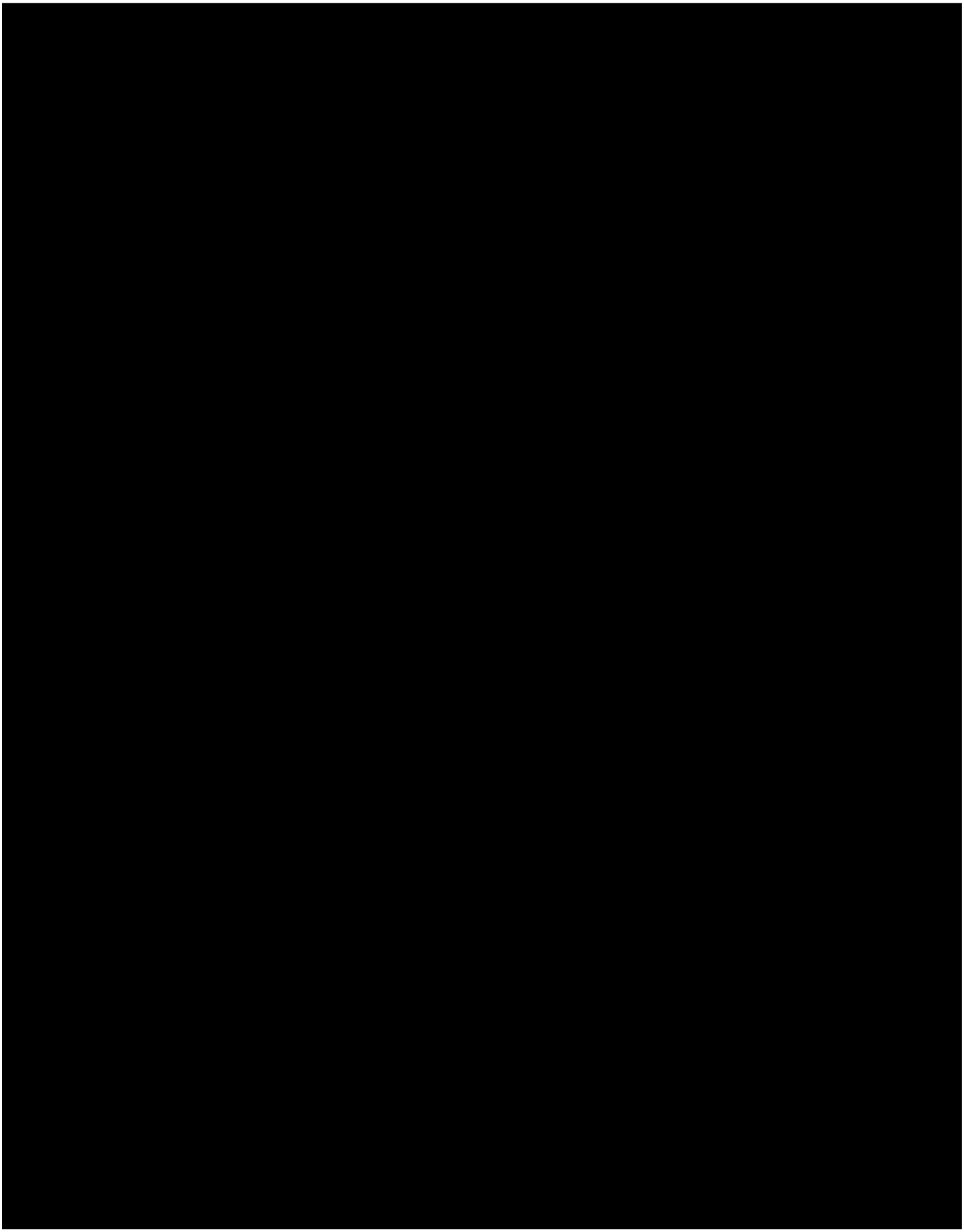

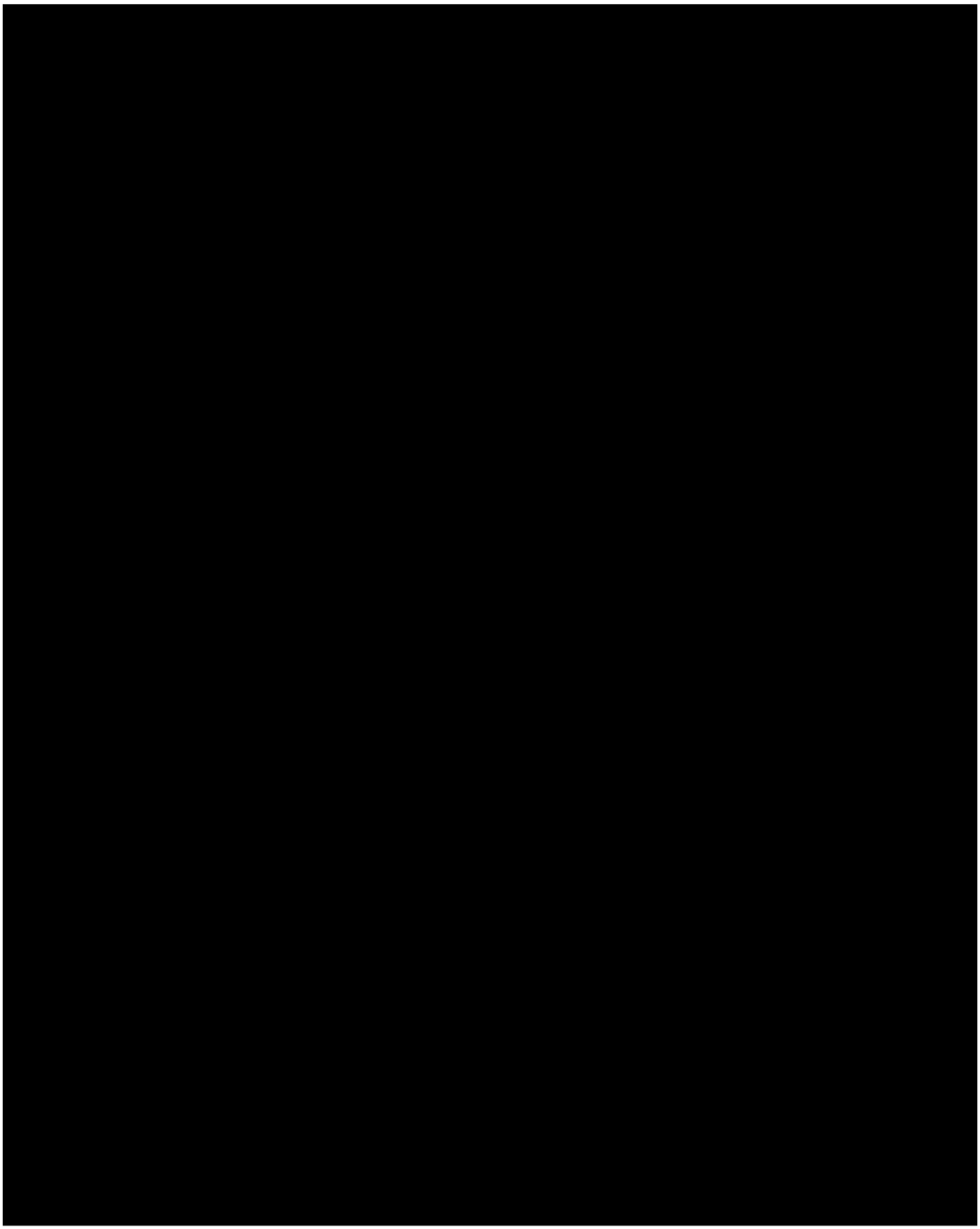

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7.0 COLD-RELATED SAFETY INFORMATION

7.1 Personnel Safety

Personnel safety during weather events is a priority. The information in this section is aimed at reducing or preventing Personnel weather-related risks.

Oberon IB personnel will stay informed of potential severe weather events and utilize the information in this annex to respond. Job safety briefings will be conducted as needed during preparation for and in response to cold weather events.

7.2 Frostbite

Frostbite is most common on the fingers, toes, nose, ears, cheeks and chin. Because of skin numbness, you may not realize you have frostbite until someone else points it out.

7.2.1 Signs and symptoms of frostbite:

- At first, cold skin and a prickling feeling
- Numbness
- Red, white, bluish-white or grayish-yellow skin
- Hard or waxy-looking skin
- Clumsiness due to joint and muscle stiffness
- Blistering after rewarming, in severe cases

7.2.2 Seek medical attention for frostbite if you experience:

- Signs and symptoms of superficial or deep frostbite
- Increased pain, swelling, redness or discharge in the area that was frostbitten
- Fever
- New, unexplained symptoms

7.3 Hypothermia

Seek immediate medical attention if you suspect hypothermia, a condition in which your body loses heat faster than it can be produced.

7.3.1 Signs and symptoms of hypothermia include:

- Intense shivering
- Slurred speech
- Drowsiness and loss of coordination

7.4 Safety Procedures

7.4.1 During extreme cold weather events, facility personnel should adhere to the following procedures:

7.4.1.1 Limit your time outdoors in cold, wet or windy weather.

7.4.1.2 Dress in multiple layers of loose, warm clothing, along with using Personal Protective Equipment (PPE), as needed.

7.4.1.3 Change out of wet clothing as soon as possible.

7.4.1.4 Wear a hat or headband that fully covers your ears.

7.4.1.5 Wear socks and sock liners that fit well, wick moisture, and provide insulation.

7.4.1.6 Seek medical care immediately if you or a co-worker shows symptoms of cold weather-related illness.

10.0 ERCOT ANNUAL WINTER WEATHER DECLARATION SUBMITTAL

10.1 ERCOT Requirement for Annual Winter Weatherization Declaration Submittal

10.1.1 Oberon IB must submit a declaration between **November 1 and December 1** that it has completed or will complete all weather preparations required by this Plan for equipment critical to the reliable operation of the Generation Resource during the winter time period (December through February).

10.1.1.1 If the work on the equipment that is critical to the reliable operation of the Generation Resource is not complete at the time of filing the declaration, the Resource Entity shall provide a list and schedule of remaining work to be completed. The declaration shall be executed by an officer or executive with authority to bind the Resource Entity.

10.1.2 Oberon IB will follow all other requirements in ERCOT Protocols 3.21(3) concerning the submission of the declaration, as applicable.

11.0 RESOURCES AND RELATED DOCUMENTS

Oberon IB Emergency Operations Plan

Oberon IB Hot Weather Annex

Oberon IB Cyber and Physical Security Incident Annex

Oberon IB Pandemic and Epidemic Annex

ERCOT

Current Protocols - Nodal: http://www.ercot.com/mktrules/nprotocols/current

- **Section 3: Management Activities for the ERCOT System**
- **Section 22 Attachment O: Declaration of Completion of Generation Resource Winter Weatherization Preparations**

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

12.0 SECTION 25.53 DEFINITIONS

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Term	Definition
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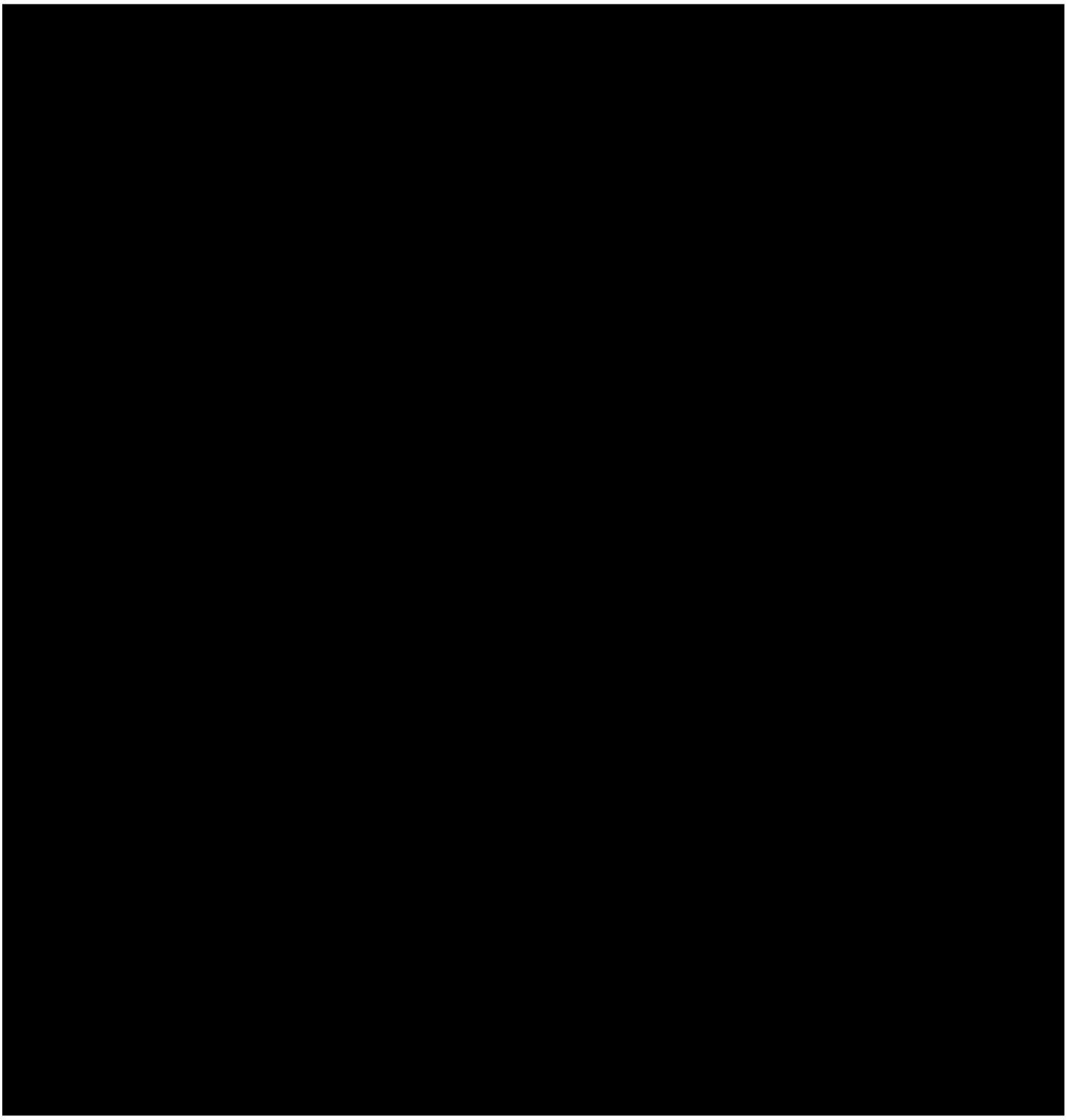

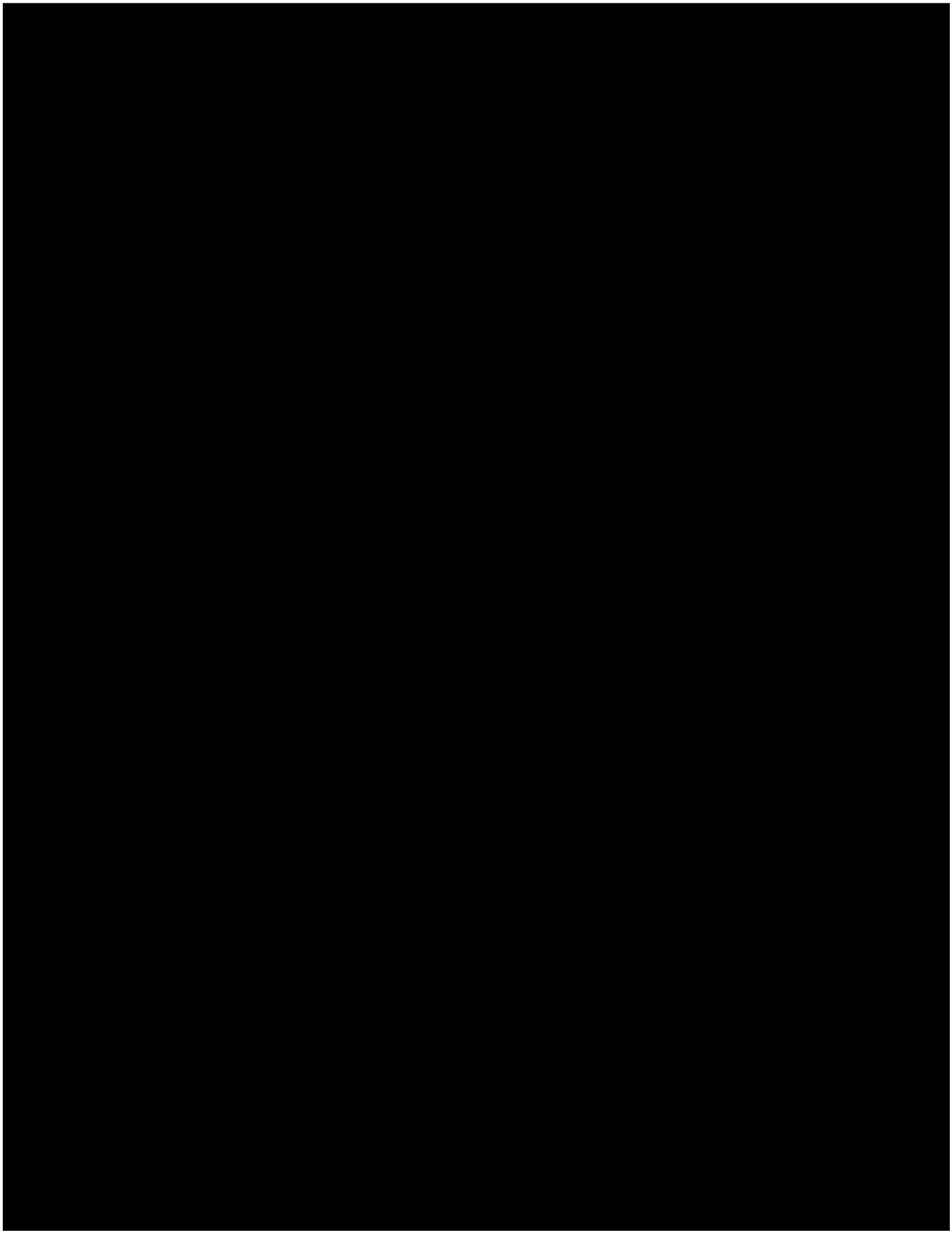

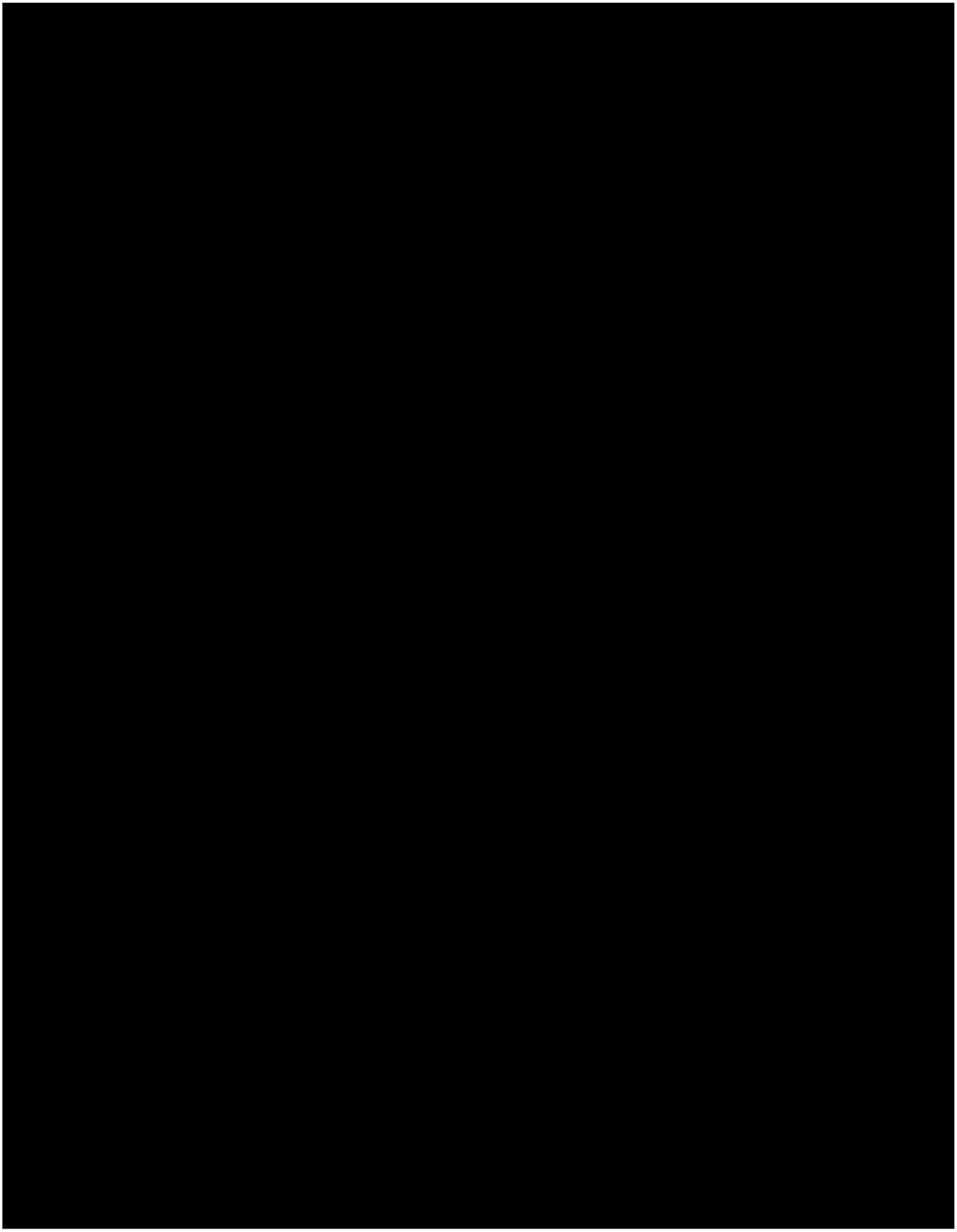

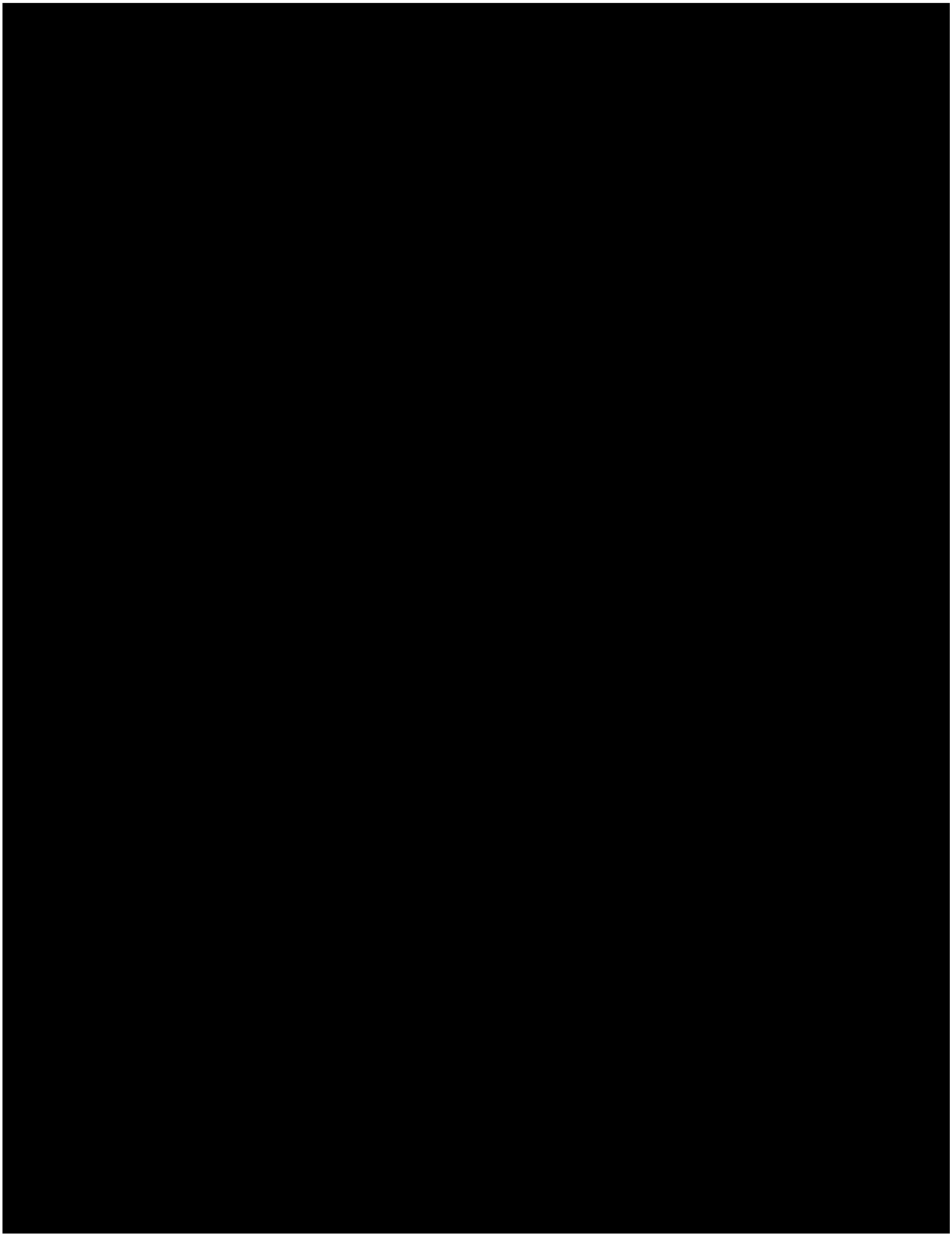

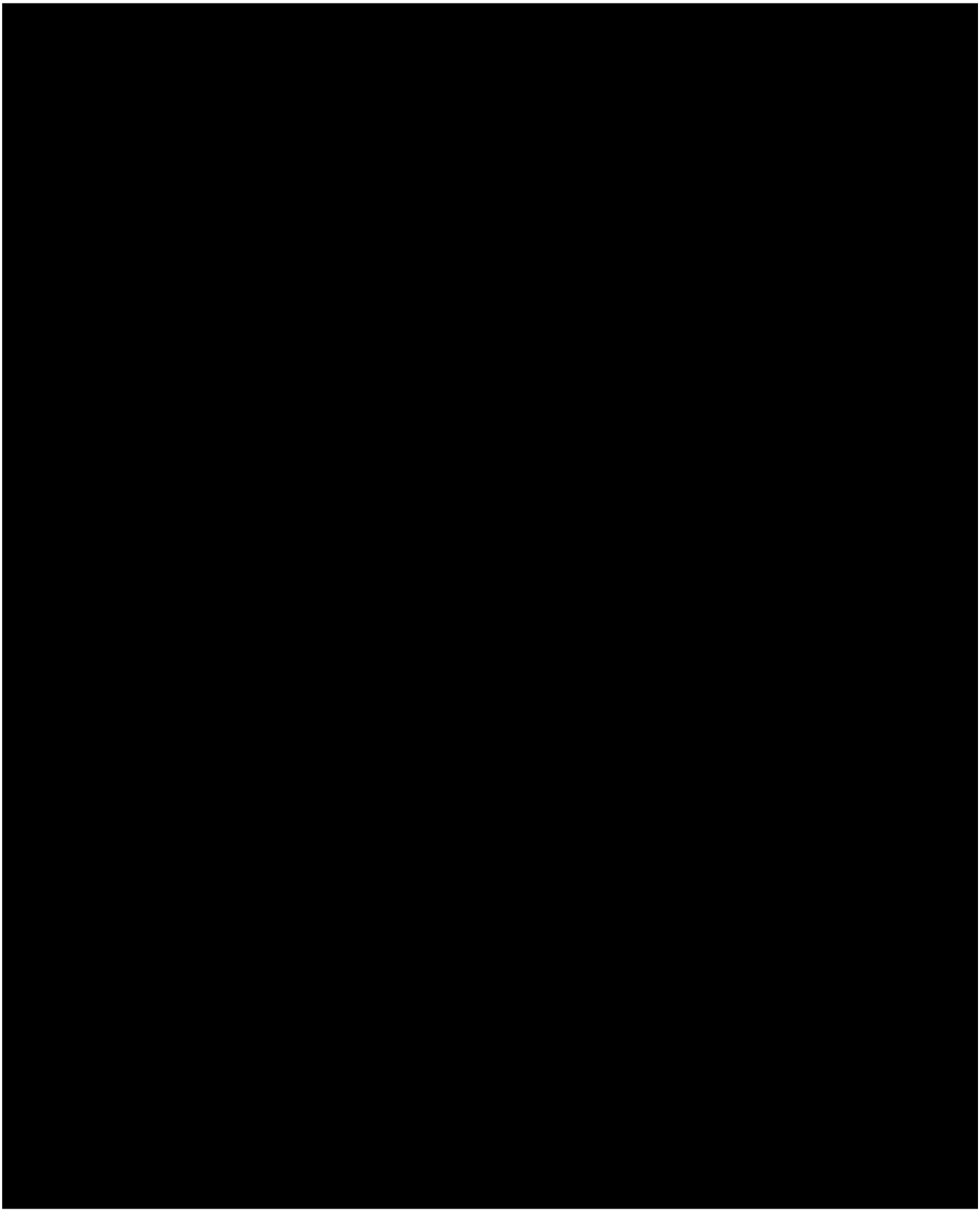

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[15] Consult with Safety department on specific gear required

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1.0 APPROVAL AND IMPLEMENTATION SECTION

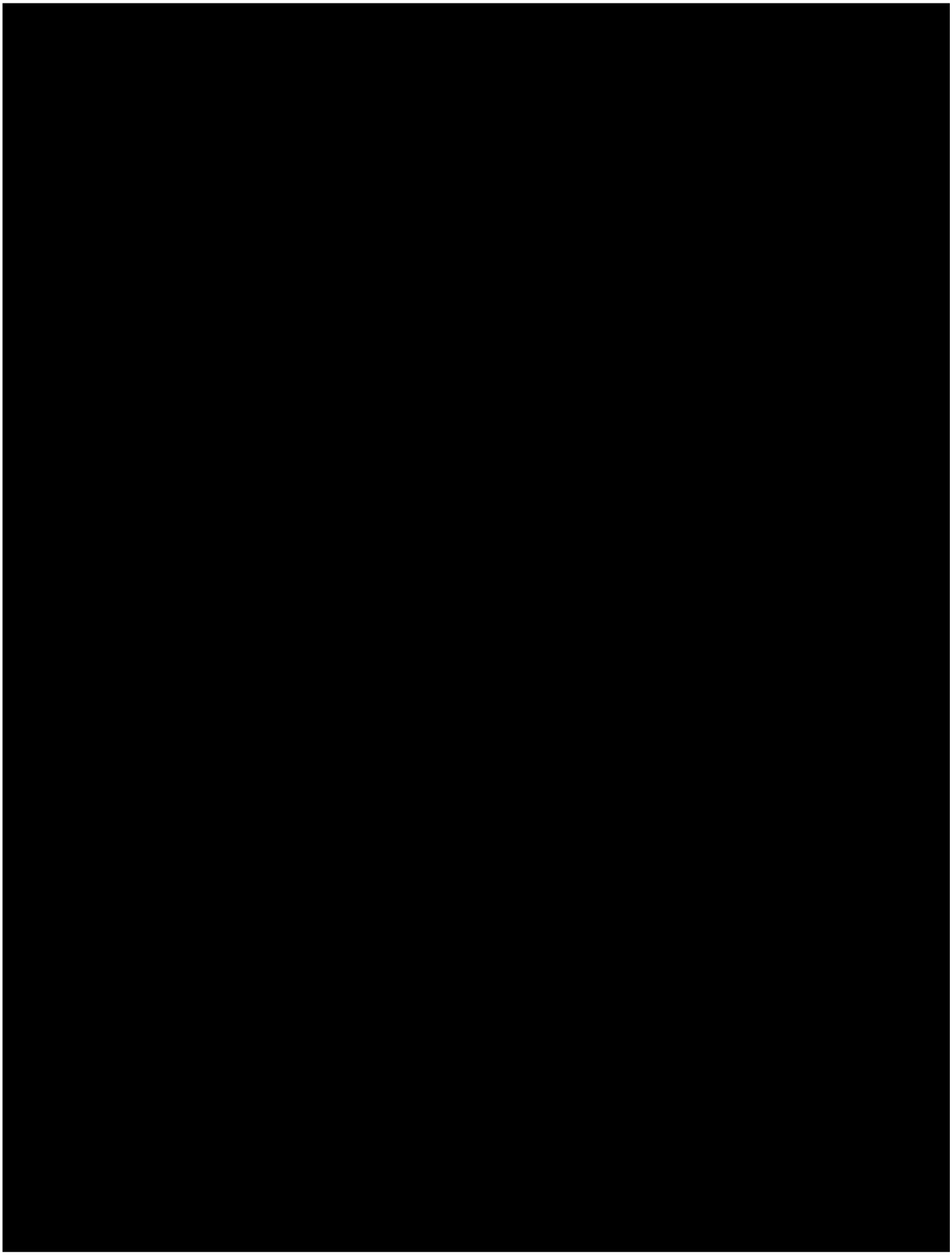
A. Introduction and Applicability

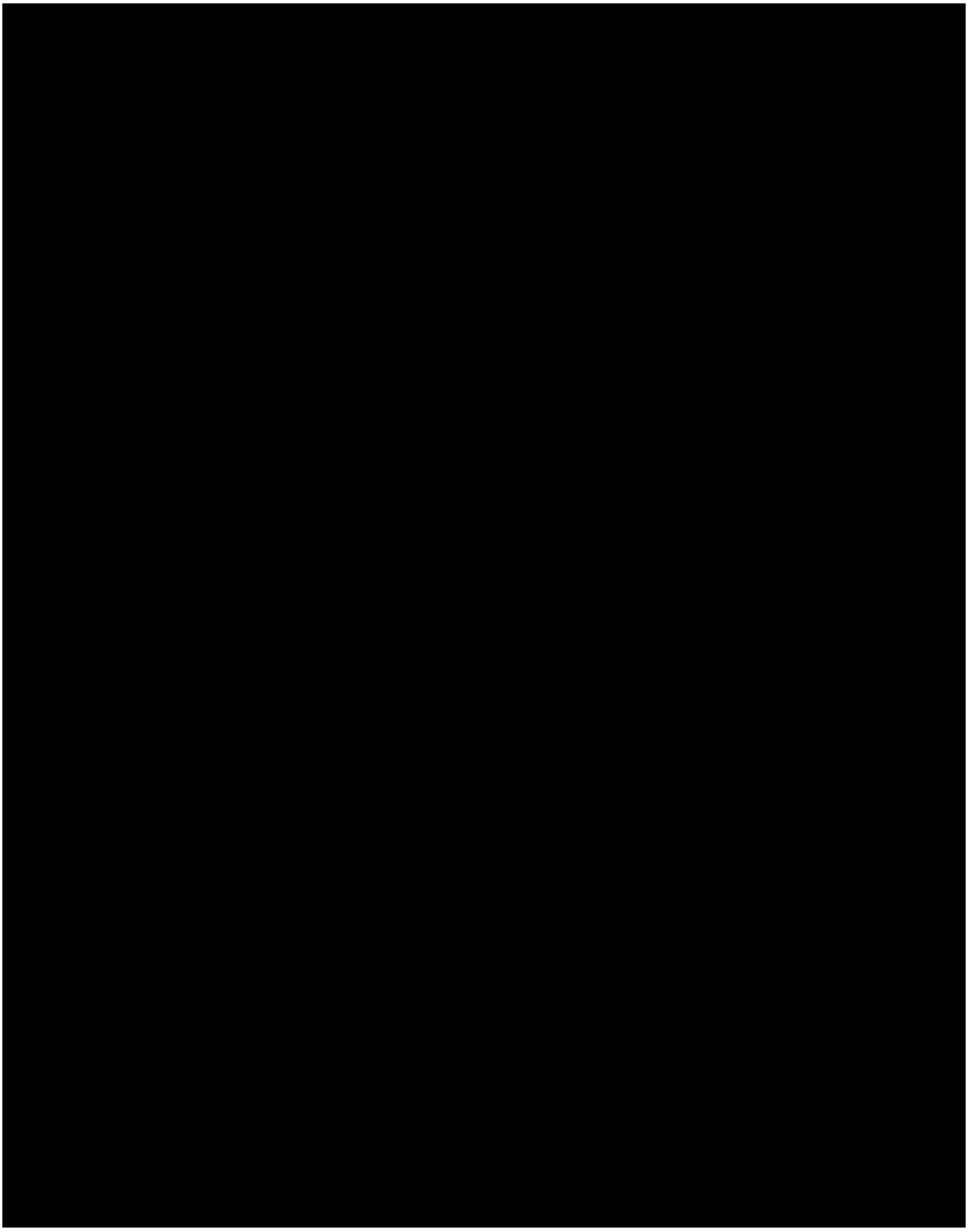
1.1 Introduction

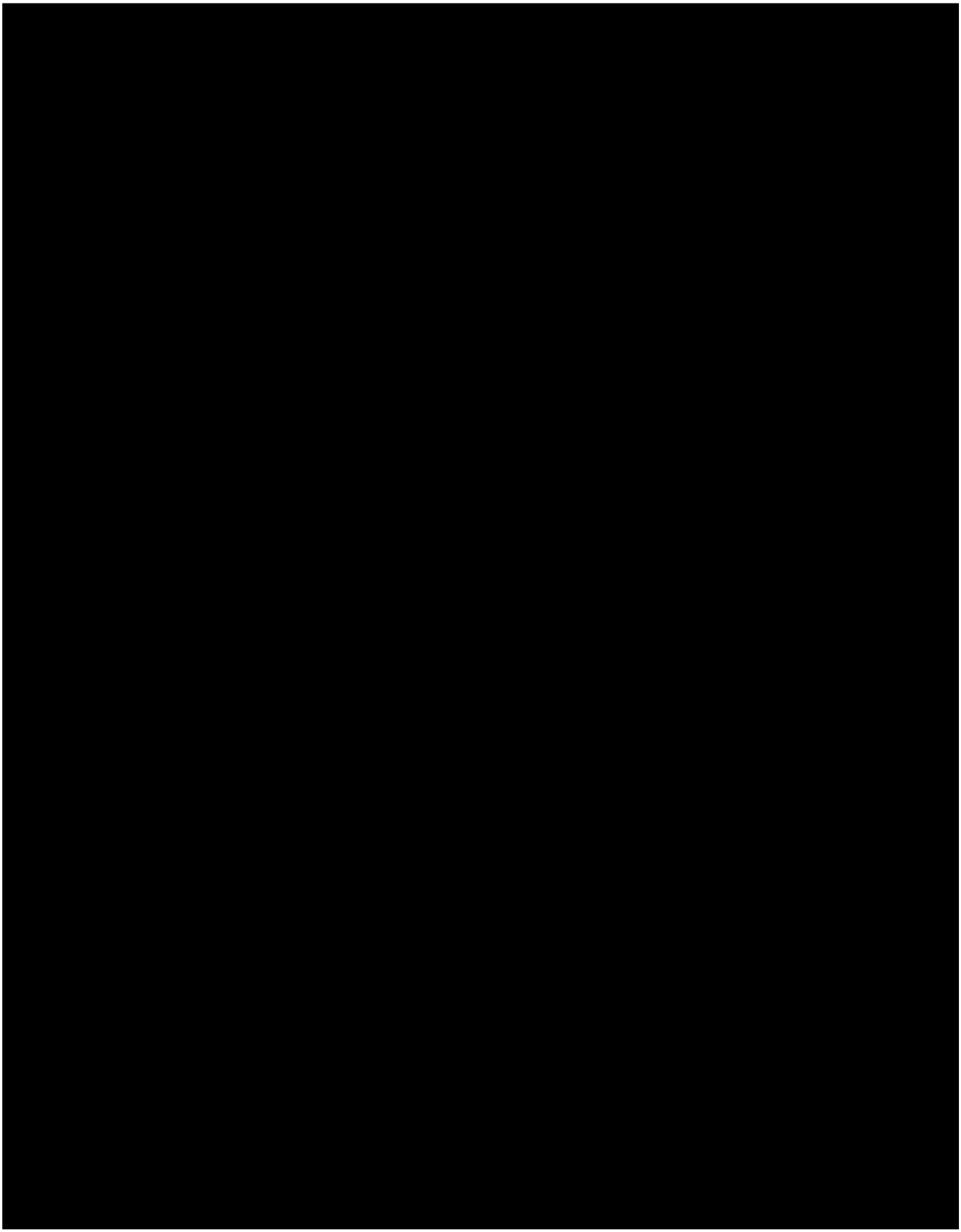
This *Cyber and Physical Security Incident Annex* provides guidance and direction to Oberon IB specific to cyber security and physical security incidents and provides information on identification and escalation of potential or actual cyber or physical security incidents.

Within this annex and all other EOP documents, the use of "EOP" refers to the entire suite of documents that address the PUCT requirements, which includes relevant annexes, as listed in the Resources and Related References section.

Any questions regarding the EOP should be directed to the Compliance Manager.







4.0 RESOURCES AND RELATED DOCUMENTS

Oberon IB Emergency Operations Plan

Oberon IB Pandemic and Epidemic Annex

Oberon IB Hot Weather Annex

Oberon IB Cold Weather Annex

Department of Energy (DOE)

Office of Cybersecurity, Energy Security & Emergency Response web page:
https://www.oe.netl.doe.gov/oe417.aspx

- DOE-417 Online Submissions and DOE-417 Form and Instructions are located on this web page.
- The Online Submissions link allows a user to include NERC System Awareness and the E-ISAC on the submittal; if the user has a login account, they can include additional recipients as well as retrieve and update past forms.

NERC

https://www.nerc.com/pa/rrm/bpsa/Pages/default.aspx

ERCOT

Current Protocols - Nodal: https://www.ercot.com/mktrules/nprotocols/current

- **Section 16: Registration and Qualification of Market Participants**

- **Section 23 Form E, Notice of Change of Information:**
- **Section 23 Form O, Notice of Cybersecurity Incident**

Current Nodal Operating Guides: https://www.ercot.com/mktrules/guides/noperating/current

- **Section 3: ERCOT and Market Participant Responsibilities**

Texas RE

Texas RE Event Analysis webpage: https://www.texasre.org/reliabilityservices

- See "Event Contact Information" section under Event Analysis

PUCT

Electric Substantive Rules: Chapter 25 Rules webpage:
https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx

- **Subchapter C, §25.53 - Electric Service Emergency Operations Plans**

Emergency Contact Update Form (posted under Emergency Management section)**:**
https://www.puc.texas.gov/industry/electric/forms/

5.0 SECTION 25.53 DEFINITIONS

Term	Definition
Annex	A section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
Drill	An operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
Emergency	A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
Entity	An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
Hazard	A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.

Term	Definition
Threat	The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.