

employee's ability to take the leave will be subject to the pandemic rules in place at the time the leave is to be taken. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.

C. Business Operations Modifications & Restrictions

1. All public lobbies are closed in NEC facilities to members and the public. Members are encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. We ask that anyone who can do business by phone to please do so in order to keep drive-thru times down.
2. NEC meetings, in person, are discouraged. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible. Local and federal ordinances limit public gatherings to less than 10, 5, or some allow no public gatherings. Meetings among a small group of employees in NEC offices may be held if necessary, but provisions to ensure social distancing of at least 6 feet apart must be met.
3. All member services are available although public areas are closed to the public and to employees for gathering. Construction activities previously suspended are gradually being added though in a manner to allow continued social distancing.
4. NEC may suspended member disconnections and continues to give extra consideration to hardship situations for member bill payment. Members who have a history of DNPs may be disconnected.
5. All employees are instructed to maintain social distancing in dealing with coworkers/ members/public. If a coworker/member/public does respect distancing requests, employees are directed to leave the area and report to their supervisor.
6. Our service and field personnel must also employ "social distancing" (of at least 6 feet) in dealing with the public. If individuals continue to approach you after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that they will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
7. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance. Those to be admitted into facilities for business reasons are required to complete the visitor questionnaire and if any answers are yes, should be denied admission. Forms completed and question should be directed to human resources.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase IV- Return to Work COVID-19

I. OBJECTIVE

- A. It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during the pandemic. In this phase of action, government officials have begun the reopening process and NEC employees will return to work. NEC continues to follow CDC Guidance to Limit the Spread of COVID 19 in the Workplace and the orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus.

II. PROCEDURES

B. Reopening of Offices to All Employees

1. Most NEC employees will return to work gradually before June 1, 2020.
 - a. Senior Department Managers will coordinate with the IT and Compliance Departments on the return schedules for their employees.
 - b. Management will continue to monitor the situation. If COVID 19 circumstances change, management may cancel or change this date; or once employees return, it is possible they will be required to return to teleworking depending on the virus spread and risk as determined by the CEO, or designee.
2. Prior to returning to office, all employee work areas must have the following available:
 - a. Disinfectant cleaning supplies and disposable towels
 - b. Hand sanitizer
 - c. Face covers
 - d. Rubber gloves
 - e. Safety glasses and face shields will be available for specified tasks, as needed.

3. Prior to teleworkers' return to offices, all employee shall receive training on the following:
 - a. Cleaning Workspaces and Frequently Touched Public Surfaces & Equipment
 - b. Wearing and Caring for Face Coverings & Rubber Gloves
 - c. Stopping the Spread Tips: Cough Etiquette, Hand Hygiene, Avoid Touching Face, Social Distancing, Sick? Stay Home
4. Possible health checks may be performed by NEC personnel as allowed by law (e.g. temperature checks, etc.).
 - a. NEC HR staff shall recommend appropriate, legal, and reasonable daily employee health screenings to limit exposure to the virus in the workplace.
 - b. To ensure expedited screening, staggered workday start schedules and electronic methods may be utilized.
 - c. If health screenings are used, an entrance to HQ facility will be designated for employees.
 - d. Health screenings may include the following:
 1. Temperature checks- self-reported or staff taken
 2. Health questionnaire
 3. Reasonable suspicion – other employees or manager report an employee with symptoms
 4. Other CDC or Texas State Department of Health recommended methods
 - e. All health screening records will be documented and maintained as confidential information.
 - f. All personnel performing health screenings will be required to wear a face shield, a face covering, prescription or safety glasses, and rubber gloves.
5. Signage shall be placed throughout the NEC facilities communicating the following key messages to employees and business-essential visitors:
 - a. Required social distancing of 6 feet
 - b. Face coverings required for interactions among employees and the public
 - c. Hand hygiene
 - d. Cough etiquette
 - e. Stop the spread tips
 - f. Clean frequently touched surfaces
 - g. Signage for employee health screenings
 - h. Go Home if you are sick or have COVID 19 symptoms

C. Sick or Exposed to COVID 19

1. If employees are sick, they should stay home from work to avoid bringing any virus into the workplace and to also allow the employee to get the rest and care needed to get well.

- a. For extended leave beyond 3 days, employee should contact their healthcare provider and request a doctor's note to return to work;
 - b. If employee has the symptoms of the flu or COVID-19, the employee should contact their healthcare provider or the health department to seek testing for COVID-19.
2. If an employee tests positive for COVID-19, this should be reported to HR, the following actions shall be taken:
 - a. HR will ask the employee to trace their steps/actions taken to determine who that individual worked with in close proximity
 - b. HR will notify the employees who came in contact with the individual
 - c. NEC will clean and disinfect the area where the individual works
 - d. NEC will monitor and potentially quarantine workers who had been in close contact as each situation dictates
3. Employee must also stay home, and report to their supervisor, exposure (contact closer than 6 feet) or possible exposure to another person who tests positive for COVID-19.
4. Employees may be able to telework if sent home if (1) their work is able to be done from home and (2) if the employees is not so ill that productivity suffers.
5. Returning to Work Following Illness or Quarantine
 - a. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met: at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and the individual has *improvement* in symptoms (e.g., cough, shortness of breath); and at least 10 days have passed *since symptoms first appeared*; or
 - b. In the case of an employee or contractor who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above; or
 - c. If the employee or contractor has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a documented negative COVID-19 test (not tested earlier than 5 days following exposure or first symptoms) and a medical professional's note clearing the individual for return based on an alternative diagnosis.
 - d. If employee had close exposure to someone being tested for COVID-19, the employee should stay home until, at least, the test results are known.
 - e. If exposed or possibly exposed to someone who tested positive for COVID-19, employee shall be sent home for 14 days from date of last exposure or employee may obtain a documented negative COVID-19 test (test results taken earlier than 5 days following exposure are not acceptable, to allow for virus incubation period).

6. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, and finally unpaid time off.
7. Time off required for illness will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
8. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.
9. NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.

D. Travel

NEC discourages personal travel and has cancelled all non-essential business travel. The CDC recommends you stay home as much as possible and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

1. NEC continues to cancel company training and non-essential travel through at least June 15, 2020.
2. Employees may travel without restrictions within the Coastal Bend Counties of Nueces, Kleberg, Jim Wells, Kenedy, Duval, McMullen, Brooks, Live Oak, San Patricio, Aransas, Refugio, and Bee.
3. Beginning May 18, 2020, employees may travel (non-air) to areas with COVID-19 spread per capita of 200 or fewer cases according to <https://coronavirus.jhu.edu/us-map>, with only a pre-reporting requirement to their supervisor. If employee travels anywhere else after the pre-travel report, employee will be required to stay home (using leave, or if no leave is available, unpaid) for one day while the extra travel is reviewed for applicability of item 4 below.
4. If an employee plans to travel or did travel to an area with COVID-19 spread per capita of greater than 200 and or traveled using air travel, they should expect restrictions upon their return BEFORE they can report to work. Restrictions will be reviewed on a case by case basis and may include:
 - a. One extra day of sick or vacation leave (or if no leave is available, time will be unpaid) to evaluate the travel that occurred.
 - b. Possible restriction to wear face coverings at all times while at work for two (2) weeks.
 - c. Possible restriction to stay home for 14 days or obtain a documented negative COVID-19 test (test results taken earlier than 5 days following return from travel are not acceptable, to allow for virus incubation period). Time off will

require use of sick leave first if available, then vacation leave, then unpaid time off.

5. Employees with vacation requests for later in the year may submit such requests on employee self-serve. Supervisors may approve the leave and travel. However, an employee's ability to take the leave will be subject to the pandemic rules in place at the time the leave is to be taken. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.

E. Business Operations Modifications & Restrictions

1. All public lobbies and restrooms are closed in NEC facilities to members and the public. Members are encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
2. All member services are available, although public areas are closed to the public and to employees for gathering. Construction activities previously suspended are resumed though in a manner to allow continued social distancing.
3. NEC may suspend member disconnections and continues to give extra consideration to hardship situations for member bill payment. Members who have a history of DNPs may be disconnected.
4. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
5. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is an extremely dangerous virus. NEC employees must social distance at all times while working.
 - a. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 - b. Our service and field personnel must also employ "social distancing" (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
6. Face coverings are required when interacting with other employees or the public. NEC will distribute face coverings for all employees. If you have your own, these will need to be approved by HR or the Safety Manager.
7. Closure of employee gathering areas such as break rooms and fitness rooms in all facilities continue, but may begin to be lifted with restrictions.
8. NEC meetings, in person, are discouraged.
 - a. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.

- b. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
 - c. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
- 9. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be admitted into facilities for business reasons are required to complete the visitor questionnaire and if any answers are yes, should be denied admission. Forms completed and question should be directed to human resources.
- 10. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.
- 11. Employees are encouraged to:
 - a. Avoid touching eyes, nose, and mouth
 - b. Cover coughs or sneezes with a tissue and then throw the tissue in the trash
 - c. Social distance and wear face coverings as appropriate on their personal time.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase V- COVID-19 Pandemic: Community & NEC Office Reopening

I. OBJECTIVE

- D. It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during the pandemic. In this phase of action, government officials have begun the reopening process and NEC is reopening its offices and facilities for employees, with restrictions. NEC continues to follow CDC Guidance to Limit the Spread of COVID 19 in the Workplace and the orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus.

II. PROCEDURES

- A. Reopening of Offices to All Employees
- a. All NEC employees have returned to work and are continuing to be supported by the following practices.
 - i. All employee work areas must have the following available:
 1. Disinfectant cleaning supplies and disposable towels
 2. Hand sanitizer
 3. Face covers
 4. Rubber gloves
 5. Safety glasses and face shields will be available for specified tasks, as needed.
 - b. Daily employee health surveys are required or temperature checks must be performed by NEC's HR Department.
 - i. Health screenings may include the following:
 1. Temperature checks- self-reported or staff taken
 2. Health questionnaire
 3. Reasonable suspicion – other employees or manager report an employee with symptoms

4. Other CDC or Texas State Department of Health recommended methods
 - ii. All health screening records are documented and maintained as confidential information.
 - iii. All personnel performing health screenings are required to wear a face shield, a face covering, prescription or safety glasses, and rubber gloves.
 - c. Signage is placed throughout the NEC facilities communicating the following key messages to employees and business-essential visitors:
 - i. Required social distancing of 6 feet
 - ii. Face coverings required for interactions among employees and the public
 - iii. Hand hygiene
 - iv. Cough etiquette
 - v. Stop the spread tips
 - vi. Clean frequently touched surfaces
 - vii. Signage for employee health screenings
 - viii. Go Home if you are sick or have COVID 19 symptoms
- B. Sick or Exposed to COVID 19
- a. If employees are sick, they should stay home from work to avoid bringing any virus into the workplace and to also allow the employee to get the rest and care needed to get well.
 - i. For extended leave beyond 3 days, employee should contact their healthcare provider and request a doctor's note to return to work;
 - ii. If employee has the symptoms of the flu or COVID-19, the employee should contact their healthcare provider or the health department to seek testing for COVID-19.
 - b. If an employee tests positive for COVID-19, this should be reported to HR, the following actions shall be taken:
 - i. HR will ask the employee to trace their steps/actions taken to determine who that individual worked with in close proximity
 - ii. HR will notify the employees who came in contact with the individual
 - iii. NEC will clean and disinfect the area where the individual works
 - iv. NEC will monitor and potentially quarantine workers who had been in close contact as each situation dictates
 - c. Employee must also stay home, and report to their supervisor, exposure (contact closer than 6 feet) or possible exposure to another person who tests positive for COVID-19.
 - d. Employees may be able to telework if sent home if (1) their work is able to be done from home and (2) if the employee is not so ill that productivity suffers.
 - e. Returning to Work Following Illness or Quarantine
 - i. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met: at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and the individual has *improvement in*

symptoms (e.g., cough, shortness of breath); and at least 10 days have passed *since symptoms first appeared*; or

- ii. In the case of an employee or contractor who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above; or
- iii. If the employee or contractor has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a documented negative COVID-19 test (not tested earlier than 6 days following exposure or first symptoms with self-isolation continued following testing) and a medical professional's note clearing the individual for return based on an alternative diagnosis.
- iv. If employee had close exposure to someone being tested for COVID-19, the employee should stay home until, at least, the test results are known.
- v. If exposed or possibly exposed to someone who tested positive for COVID-19, employee shall be sent home for 14 days from date of last exposure or employee may obtain a documented negative COVID-19 test (test results taken earlier than 6 days following exposure are not acceptable, to allow for virus incubation period).
- f. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed (if the employee or member of household is ill), and finally unpaid time off.
- g. Time off required for serious illness for employee, family member, or member of household will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
- h. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.
- i. NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.

C. Travel

NEC discourages personal travel and has cancelled all non-essential business travel. The CDC recommends you stay home as much as possible and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

- a. NEC continues to cancel company training and non-essential business travel through at least July 31, 2020.

- b. Employees may travel without restrictions within the Coastal Bend Counties of Nueces, Kleberg, Jim Wells, Kenedy, Duval, McMullen, Brooks, Live Oak, San Patricio, Aransas, Refugio, and Bee.
 - c. Beginning June 16, 2020, employees may travel (non-air) to areas with COVID-19 spread per capita of 400 or fewer cases according to <https://coronavirus.jhu.edu/us-map> or county health department sites, with only a pre-reporting requirement to their supervisor.
 - d. If employee travels anywhere else, with a spread of over 400 per capita after the pre-travel report, employee must notify their supervisor and will be required to stay home (using leave, or if no leave is available, unpaid) for one day while the extra travel is reviewed for applicability of item e below.
 - e. If an employee plans to travel or did travel- either as a destination or as an overnight stop in route- to an area with COVID-19 spread per capita of greater than 400 and or traveled using air travel, they should report this to their supervisor and expect restrictions upon their return BEFORE they can report to work. Restrictions will be reviewed on a case by case basis and may include:
 - i. Minimum of one extra day of sick or vacation leave (or if no leave is available, time will be unpaid) to evaluate the travel that occurred.
 - ii. Possible restriction to wear face coverings at all times while at work for two (2) weeks.
 - iii. Possible restriction to stay home for 14 days to self-observe or obtain a documented negative COVID-19 test (test results taken earlier than 6 days following return from travel are not acceptable, to allow for virus incubation period). Company requests to stay home will require use of sick leave first if available, then vacation leave, then unpaid time off.
 - f. Employees with vacation requests for later in the year may submit such requests on employee self-serve. Supervisors may approve the leave and travel. However, an employee's ability to take the leave will be subject to the pandemic rules in place at the time the leave is to be taken. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.
- D. Business Operations Modifications & Restrictions**
- a. Members continue to be encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
 - b. The headquarters and subsequently the service center lobbies may be opened, with social distancing required, face coverings recommended, and limited occupancy, along with appropriate signage.
 - c. All public restrooms remain closed to members and the public in NEC facilities.
 - d. NEC may continue member disconnections for members who have not requested payment agreements or who have not met payment agreement terms. NEC continues to give extra consideration to hardship situations for member bill payment.

- e. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
- f. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is an extremely dangerous virus. NEC employees must social distance at all times while working.
 - i. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 - ii. Our service and field personnel must also employ “social distancing” (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
 - iii. If a work procedure prevents employees from social distancing 6 feet, then all employees involved in the procedure should wear face coverings at all times during the procedure, unless the face covering presents a safety hazard (e.g. fogging up glasses affecting visibility, etc.).
- g. NEC distributed face coverings for all employees.
 - i. If you have your own face coverings, these will need to be approved by HR or the Safety Manager.
 - ii. Face coverings are required when interacting with other employees, when social distancing is not possible.
 - iii. Face coverings are required in hallways and common areas of the co-op when social distancing ability cannot be predicted.
 - iv. Face coverings are required at all times when interacting with the public.
- h. NEC will begin to open, to a limited extent, employee gathering areas such as break rooms and fitness rooms in all facilities. Social distancing and face covers in break rooms are required.
- i. NEC meetings, in person, are discouraged but may be held if social distancing requirements can be met.
 - i. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.
 - ii. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
 - iii. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
- j. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be admitted into facilities for business reasons are required to complete the visitor health survey and if any answers are yes, should be denied admission. Forms completed and questions should be directed to human resources.

- k. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.
- l. Employees are encouraged to:
 - i. Avoid touching eyes, nose, and mouth
 - ii. Cover coughs or sneezes with a tissue and then throw the tissue in the trash
 - iii. Social distance and wear face coverings as appropriate on their personal time.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase VI- COVID-19 Pandemic: Increasing Community Spread

I. OBJECTIVE

It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during this pandemic. In this phase of action, communities are (or mostly) open and there is wide community spread of the virus. Critical services, processes, and operations at the Co-op are vulnerable to interruption due to loss of personnel affected by the virus or various levels of exposure. As a critical business, in this phase, NEC will begin to put processes in place to allow employees to work following some level of potential exposure to the virus, if they are asymptomatic, and with reasonable protections. NEC continues to follow CDC Guidance for critical infrastructure workers and any applicable orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus and available treatments.

II. DEFINITIONS

- A. Community Spread: the spread of an illness for which the source of infection is unknown.
- B. COVID-19 Rapid Test: a viral test process that provides results within minutes or hours. This test may have a lower accuracy if not performed properly by the testing center.
- C. COVID-19 Test: an FDA-approved viral test for COVID-19; uses respiratory droplets for the test (nasal swab or saliva); a serological test (blood test for antibodies) is not acceptable to diagnose COVID 19.
- D. Face Coverings: a cloth face covering which should cover your mouth and nose while allowing you to breathe comfortably, which also minimizes the spread of droplets from you to others.
- E. Exposure Levels – employees shall report any of these exposure levels to HR
 - i. Positive for COVID-19: employee is confirmed positive for COVID-19 via testing;
 - ii. Exposure: employee or member of household was within 6 feet of an infected person (confirmed positive test for COVID-19) for at least 15 minutes within a timeframe starting from 48 hours before the person began feeling sick until the time the patient was isolated, or 14 days after the known exposure that resulted in the contracting of the virus.

- iii. Potential Exposure: employee was less than 6 feet for 15 minutes or more from a person who is being tested and awaiting results for COVID 19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic or begins with the date of the employee's know exposure and goes until 14 days following exposure.
- iv. Other Exposure Levels: employee or member of household was less than 6 feet for 15 minutes or more from another person who had potential exposure (see definition for "potential exposure" above).
- F. Investigation Day – single day in which employee does not report to work while an investigation is made regarding the exposure/risk level and the work restrictions that will be required for the employee.
- G. Work Isolation: may be used by employees in certain jobs if there is an exposure and employee is asymptomatic/ able to work, or for a potential exposure; employee must avoid any physical interactions with other employees and work facilities; includes teleworking or isolation from other employees and facilities while continuing to work; may last up to 14 days.
- H. Self-quarantine: means staying home, monitoring your health, and maintaining social distancing (at least 6 feet) from others at all times; generally, this lasts for 14 days from last exposure; employees may telework if possible until symptoms worsen.
- I. Social Distancing: maintaining a distance of at least 6 feet from others; this is a CDC-recommended method to help limit the spread of a virus.

III. PROCEDURES

- m. All staffed employee work areas must have the following available to support regular infection control:
 - i. Disinfectant cleaning supplies and disposable towels
 - ii. Hand sanitizer
 - iii. Face covers
 - iv. Rubber gloves
 - v. Safety glasses and face shields will be available for specified tasks, as needed.
- n. All NEC employees are required to adhere to infection control procedures at all times, as follows. Signage and training will also be provided to all employees.
 - i. Required social distancing of 6 feet while in facilities or while working for NEC.
 - ii. Face coverings are recommended for all interactions with others.
 - iii. Face coverings are required for all interactions among employees and the public when social distancing cannot be ensured, unless the face covering presents a safety risk to the employee.
 - iv. Face coverings may be required for an employee, at all times while working, following a reported "potential exposure" or "other level exposure"
 - v. Hand hygiene- NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially

- after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
- vi. Cough etiquette – cover cough at all times including while wearing face coverings
 - vii. Clean frequently touched surfaces- the cooperative cleans work areas in offices nightly, but employees are responsible to clear frequently touched surfaces throughout their work day.
 - viii. Employees must take temperature daily and complete employee health screening before entering work facilities.
 - ix. Notify your supervisor and go home if you are sick or have COVID 19 symptoms.
- o. Daily employee health surveys are required and/or temperature checks must be performed by NEC's HR Department.
- i. Health screenings may include the following:
 - 1. Temperature checks- self-reported or staff taken
 - 2. Health questionnaire
 - 3. Self-monitoring and reporting.
 - 4. Reasonable suspicion – other employees or manager report an employee with symptoms.
 - 5. Other CDC or Texas State Department of Health recommended methods
 - ii. All health screening records are documented and maintained as confidential information.
 - iii. All personnel performing physical health screenings (e.g. temperature checks) are required to wear a face shield, a face covering, prescription or safety glasses, and rubber gloves.
- E. Sick or Exposed to COVID 19
- i. If employees are sick, they should stay home from work to avoid bringing any virus into the workplace and to also allow the employee to get the rest and care needed to get well.
 - 1. For extended leave beyond 3 days, employee should contact their healthcare provider and request a doctor's note to return to work;
 - 2. If employee has the symptoms of the flu or COVID-19, the employee should contact their healthcare provider, private testing site, or the health department to seek guidance regarding testing for COVID-19 and other guidance.
 - ii. If an employee tests positive for COVID-19, this should be reported to HR immediately. The following actions shall be taken:
 - 1. **Employee must self-quarantine** until released by healthcare provider; no earlier than 3 days following the end of all symptoms (with no medicines), and a negative COVID-19 test.
 - 2. NEC will deep clean and disinfect the area where the individual works
 - 3. Contact Tracing

- a. HR will ask the employee to trace their steps/actions taken to determine who that individual worked with in close proximity (<6 ft.) for 15 minutes since the time of exposure, if known, or 48 hours prior to the onset of symptoms.
 - b. HR will notify the employees who came in contact with the individual without using the employee's name.
 - c. NEC will monitor. Employees will be asked to wear face coverings and social distance, and/or work isolate or self-quarantine as each situation dictates depending on level of exposure.
- iii. If an employee has a potential exposure (as defined in section II.E.iii) employee should immediately report this to their supervisor or HR. **Work isolation or self-quarantine** shall be required until test results are known. Once test results are confirmed, a discussion of any further necessary actions will be conducted with HR.
- iv. If you have been around someone who was identified as a close contact with potential exposure to a person with COVID-19 (as defined in section II.E.iii), employees should immediately report this to their supervisor or HR, and closely monitor yourself for any symptoms of COVID-19. You do not need to self-quarantine. **Self-monitoring, along with stringent social distancing and face coverings while working, are required.**
- v. Employee with potential exposure or other level potential exposures (as indicated in II.E.ii-iv) must also stay home for one investigation day, to review any exposure. HR will review the situations and advise employee for return-to-work.
- vi. Employee with potential exposure may also choose to be tested on their own. If exposure occurred at work, the Co-op will arrange/pay for the test.
- vii. Employees may be able to telework if sent home if (1) their work is able to be done from home and (2) if the employee is not so ill that productivity may suffer.

F. Returning to Work Following Illness or Quarantine

- i. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met:
 - 1. (1) at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and
 - 2. the individual has *improvement* in symptoms (e.g., cough, shortness of breath, etc.); and
 - 3. at least 10 days have passed *since symptoms first appeared*
- ii. In the case of an employee or contract worker who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above
- iii. If the employee or contract worker has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a documented negative COVID-19 test (not tested earlier than 6 days following exposure or first symptoms with self-isolation continued following

testing) and a medical professional's note clearing the individual for return based on an alternative diagnosis.

- iv. If employee had potential exposure to someone being tested for COVID-19, the employee should stay home or remain in work isolation until, at least, the test results are known.
- v. If exposed to someone who tested positive for COVID-19, employee shall be sent home (or work isolate if possible and appropriate) for 14 days from date of last exposure or employee may obtain a documented negative COVID-19 test (test results taken earlier than 6 days following exposure are not acceptable, to allow for virus incubation period).
- vi. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed (if the employee or member of household is ill), and finally unpaid time off.
- vii. Time off required for serious illness for employee, family member, or member of household will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
- viii. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.

G. Travel

NEC discourages personal travel and has cancelled all non-essential business travel. The CDC recommends you stay home as much as possible and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

- i. NEC continues to cancel company training and non-essential business travel through at least July 31, 2020.
- ii. Employees may travel without restrictions within the Coastal Bend Counties of Nueces, Kleberg, Jim Wells, Kenedy, Duval, McMullen, Brooks, Live Oak, San Patricio, Aransas, Refugio, and Bee.
- iii. Employees may travel via non-public transportation to other counties in Texas with less than 100 active cases, without restriction or reporting.
- iv. Employees may travel via non-public transportation to areas with COVID-19 active spread per capita of 400 or fewer active cases according to data from <https://coronavirus.jhu.edu/us-map> or county health department sites, or as posted on the employee portal, with only a pre-reporting requirement to their supervisor.
- v. If employee travels anywhere else, with a spread of over 400 active cases per capita after the pre-travel report, employee must notify their supervisor and will

be required to stay home (using leave, or if no leave is available, unpaid) for one investigation day while the extra travel is reviewed for applicability of item v below.

- vi. If an employee plans to travel or did travel- either as a destination or as an overnight stop in route- to an area with COVID-19 spread per capita of greater than 400 active cases and or traveled using air travel, they should report this to their supervisor and expect restrictions upon their return BEFORE they can report to work. Restrictions will be reviewed on a case by case basis and may include:
 - 1. Minimum of one investigation day - extra day of sick or vacation leave (or if no leave is available, time will be unpaid) to evaluate the travel that occurred.
 - 2. Possible restriction to wear face coverings at all times while at work for two (2) weeks.
 - 3. Possible restriction to stay home for 14 days to self-observe or obtain a documented negative COVID-19 test (test results taken earlier than 6 days following return from travel are not acceptable, to allow for virus incubation period). Company requests to stay home will require use of sick leave first if available, then vacation leave, then unpaid time off.
- vii. Employees with vacation requests for later in the year may submit such requests on employee self-serve. Supervisors may approve the leave and travel. However, an employee's ability to take the leave will be subject to the pandemic rules in place at the time the leave is to be taken. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.

H. Business Operations Modifications & Restrictions

- i. Members continue to be encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
- ii. The headquarters and subsequently the service center lobbies may be opened, with social distancing required, face coverings recommended, and limited occupancy, along with appropriate signage.
- iii. All public restrooms remain closed to members and the public in NEC facilities.
- iv. NEC may continue member disconnections for members who have not requested payment agreements or who have not met payment agreement terms. NEC continues to give extra consideration to hardship situations for member bill payment.
- v. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
- vi. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is a dangerous virus. **NEC employees must social distance (>6ft. apart) at all times while working.**

1. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 2. Our service and field personnel must also employ “social distancing” (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
 3. If a work procedure prevents employees from social distancing 6 feet, then all employees involved in the procedure should wear face coverings at all times during the procedure, unless the face covering presents a safety hazard (e.g. fogging up glasses affecting visibility, etc.).
- vii. NEC distributed face coverings for all employees.
1. If you have your own face coverings, these will need to be approved by HR or the Safety Manager.
 2. Face coverings are required when interacting with other employees, when social distancing is not possible.
 3. Face coverings are required in hallways and common areas of the co-op when social distancing ability cannot be predicted.
 4. Face coverings are required at all times when interacting with the public.
- viii. NEC may begin to open, to a limited extent, employee gathering areas such as break rooms and fitness rooms in all facilities. Social distancing and face covers in break rooms are required at all times.
- ix. NEC meetings, in person, are discouraged but may be held if social distancing requirements can be met.
1. Face coverings should be worn at all times while entering and exiting training areas.
 2. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.
 3. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
 4. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
- x. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be admitted into facilities for business reasons are required to complete the visitor health survey and if any answers are yes, should be denied admission. Forms completed and questions should be directed to human resources.
- xi. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase VII- COVID-19 Pandemic: Community Spread, Staffing Considerations

I. OBJECTIVE

It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during this pandemic. In this phase of action, communities are partially open and there is community spread of the virus. Critical services, processes, and operations at the Co-op are vulnerable to interruption due to loss of personnel affected by the virus or various levels of exposure. Employees have challenges at home due to virtual schooling of children. As a critical business, in this phase, NEC expands processes to allow employees to work following some level of potential exposure to the virus, if they are asymptomatic, and with reasonable protections. NEC continues moves to follow CDC guidance for employers and critical infrastructure workers and any applicable orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus and available treatments.

II. DEFINITIONS

- J. Community Spread: the spread of an illness for which the source of infection is unknown.
- K. COVID-19 Rapid Test: a viral test process that provides results within minutes or hours. This test may have a lower accuracy if not performed properly by the testing center.
- L. COVID-19 Test: an FDA-approved viral test for COVID-19; uses respiratory droplets for the test (nasal swab or saliva); Note: a serological test (blood test for antibodies) is not acceptable to diagnose COVID 19.
- M. Face Coverings: a cloth face covering which should cover your mouth and nose while allowing you to breathe comfortably, which also minimizes the spread of droplets from you to others.
- N. Exposure Levels – employees shall report any of these exposure levels to HR
 - v. Positive for COVID-19: employee is confirmed positive for COVID-19 via testing;
 - vi. Exposure: employee or member of household was within 6 feet without a mask of an infected person (confirmed positive test for COVID-19) for at least 15 minutes within a timeframe starting from 48 hours before the person began

feeling sick until the time the patient was isolated, or 14 days after the known exposure that resulted in the contracting of the virus.

- vii. Potential Exposure: employee was less than 6 feet for 15 minutes or more, without a mask, from a person who is being tested and awaiting results for COVID 19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic or begins with the date of the employee's know exposure and goes until 14 days following exposure.
- viii. Other Exposure Levels: employee or member of household was less than 6 feet for 15 minutes or more without a mask from another person who had potential exposure (see definition for "potential exposure" above).
- O. Investigation Day – single day in which employee does not report to work while an investigation is made regarding the exposure/risk level and the work restrictions that will be required for the employee.
- P. Work Isolation: may be used by employees in certain jobs if there is an exposure and employee is asymptomatic/ able to work, or for a potential exposure; employee must avoid any physical interactions with other employees and work facilities; includes teleworking or isolation from other employees and facilities while continuing to work; may last up to 14 days.
- Q. Self-quarantine: means staying home, monitoring your health, and maintaining social distancing (at least 6 feet) from others at all times; generally, this lasts for 14 days from last exposure; employees may telework if possible until symptoms worsen.
- R. Social Distancing: maintaining a distance of at least 6 feet from others; this is a CDC-recommended method to help limit the spread of a virus.

III. PROCEDURES

- b. All staffed employee work areas must have the following available to support regular infection control:
 - i. Disinfectant cleaning supplies and disposable towels
 - ii. Hand sanitizer
 - iii. Face covers
 - iv. Rubber gloves
 - v. Safety glasses and face shields will be available for specified tasks, as needed.
- c. **All NEC employees are required to adhere to infection control procedures at all times, as follows.** Signage and training will also be provided to all employees.
 - i. Required social distancing of 6 feet while in facilities or while working for NEC.
 - ii. Face coverings are recommended for all interactions with others.
 - iii. Face coverings are required for all interactions among employees and the public when social distancing cannot be ensured, unless the face covering presents a safety risk to the employee.

- iv. Employees who drive company vehicles must not have others in the vehicle with them in the course of performing work, and should not get in contractor or other public's vehicles, in the course of work.
 - v. Face coverings may be required for an employee, at all times while working, following a reported "potential exposure" or "other level exposure"
 - vi. Hand hygiene- NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
 - vii. Cough etiquette – cover cough at all times including while wearing face coverings
 - viii. Clean frequently touched surfaces- the cooperative cleans work areas in offices nightly, but employees are responsible to clear frequently touched surfaces throughout their work day.
 - ix. Employees must take temperature daily and complete employee health screening before entering work facilities.
 - x. Notify your supervisor and go home if you are sick or have COVID 19 symptoms.
- d. Daily employee health surveys are required and/or temperature checks must be performed by NEC's HR Department.
- i. Health screenings may include the following:
 - 1. Temperature checks- self-reported or staff taken
 - 2. Health questionnaire
 - 3. Self-monitoring and reporting.
 - 4. Reasonable suspicion – other employees or manager report an employee with symptoms.
 - 5. Other CDC or Texas State Department of Health recommended methods
 - ii. All health screening records are documented and maintained as confidential information.
 - iii. All personnel performing physical health screenings (e.g. temperature checks) are required to wear a face shield, a face covering, prescription or safety glasses, and rubber gloves.

I. Sick or Exposed to COVID 19

All employees are required to self-monitor for illness and COVID-19 symptoms during the pandemic. In addition, stringent social distancing and face coverings while working are required. These steps are required to help protect employees and limit the spread of the virus in the workplace.

- i. **If employees are sick**, they should stay home from work to (1) avoid bringing any virus into the workplace and (2) also to allow the employee to get the rest and care needed to get well.
 - 1. For extended leave beyond 3 days, employee should contact their healthcare provider and request a doctor's note to return to work;

2. If employee has the symptoms of the flu or COVID-19, the employee should contact their healthcare provider, private testing site, or the health department to seek guidance regarding testing for COVID-19 and other guidance.
- ii. **If an employee tests positive for COVID-19**, this should be reported to HR immediately. HR will treat this information as confidential. The following actions shall be taken:
 1. Employee must self-quarantine until released by healthcare provider; no earlier than 3 days following the end of all symptoms (with no medicines), and a negative COVID-19 test.
 2. NEC will deep clean and disinfect the area where the individual works
 3. Contact Tracing
 - a. HR will ask the employee to trace their steps/actions taken to determine who that individual worked with in close proximity (<6 ft.) for 15 minutes since the time of exposure, if known, or 48 hours prior to the onset of symptoms.
 - b. HR will notify the employees who came in contact with the individual without using the employee's name.
 - c. NEC will monitor. Employees will be asked to wear face coverings and social distance, and/or work isolate or self-quarantine as each situation dictates depending on level of exposure/potential exposure.
- iii. **If employee had an exposure (see definition Section II)**, employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self-quarantine shall be required for a period of 14 days following the exposure. If tested and once test results are confirmed, a discussion of any further necessary actions will be conducted with HR.
- iv. **If an employee has a potential exposure (see definition Section II)**, employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self-quarantine may be required for 14 days or until test results are known. Once test results are confirmed, a discussion of any further necessary actions will be conducted with HR. **Self-monitoring, along with stringent social distancing and face coverings while working, are required.**
- v. **If an employee has another level of exposure**, such as around someone who was identified as a close contact with potential exposure to a person with COVID-19 (as defined in section II), employees should immediately report this to their supervisor or HR. Employee should closely monitor him/herself for any symptoms of COVID-19. Depending on the situation, guidance may be that an employee does not need to self-quarantine or work isolate.
- vi. Employee with potential exposure or other level potential exposures (as indicated in Section II) must also stay home for one investigation day, to review any exposure. HR will review the situations and advise employee for return-to-work.
- vii. Employee with exposure or potential exposure that occurred outside of work, may choose to be tested on their own, at their own expense. If exposure occurred at work, the Co-op will arrange/pay for any testing as appropriate.

- viii. Employees may be able to telework for work isolation if (1) their work is able to be substantially done from home and (2) if the employee is not so ill that productivity may suffer.

J. Returning to Work Following Illness or Quarantine

- i. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met:
 - 1. (1) at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and
 - 2. the individual has *improvement* in symptoms (e.g., cough, shortness of breath, etc.); and
 - 3. at least 10 days have passed *since symptoms first appeared*
- ii. In the case of an employee or contract worker who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above
- iii. If the employee or contract worker has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a documented negative COVID-19 test (not tested earlier than 6 days following exposure or first symptoms with self-isolation continued following testing) and a medical professional's note clearing the individual for return based on an alternative diagnosis.
- iv. If employee had potential exposure to someone being tested for COVID-19, the employee should stay home or remain in work isolation until, at least, the test results are known.
- v. If exposed to someone who tested positive for COVID-19, employee shall be sent home (or work isolate if possible and appropriate) for 14 days from date of last exposure or employee may obtain a documented negative COVID-19 test (test results taken earlier than 6 days following exposure are not acceptable, to allow for virus incubation period).
- vi. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed (if the employee or member of household is ill), and finally unpaid time off.
- vii. Time off required for serious illness for employee, family member, or member of household will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
- viii. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.

K. Travel

NEC discourages personal travel and has cancelled all non-essential business travel. The CDC recommends you stay home as much as possible and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

- i. NEC continues to cancel company training and non-essential business travel through at least September 30, 2020.
- ii. Employees may travel without restrictions within the Coastal Bend Counties of Nueces, Kleberg, Jim Wells, Kenedy, Duval, McMullen, Brooks, Live Oak, San Patricio, Aransas, Refugio, and Bee. **Employees are advised to exercise caution- practice social distancing and/or wear face coverings- in travels to any of these/other areas with high active community spread.**
- iii. Employees may travel via non-public transportation (personal vehicle/aircraft or privately chartered transportation) to other counties in Texas with 400 or less active cases per capita, without return restrictions or reporting.
- iv. Employees traveling via public transportation (e.g. bus, trains, planes) to areas with COVID-19 active spread per capita of greater than 400 active cases according to data from <https://coronavirus.jhu.edu/us-map> or state/county health department sites, or as posted on the employee portal are subject to the following.
 1. Must pre-report the travel to their supervisor and HR.
 2. Will be required to stay home (using leave, or if no leave is available, unpaid) for up to one investigation day while the extra travel is reviewed for the risk the employee poses to other NEC employees in the workplace.
 3. If employees do not practice social distancing and the wearing of face coverings at all times in the presence of non-household members while traveling, employees should expect restrictions upon their return BEFORE they can report to work. Any applicable restrictions will be reviewed on a case by case basis and may include:
 - a. Possible restriction to wear face coverings at all times in the presence of others while at work for two (2) weeks (in addition to self-observing and social distancing already required at all times possible of all employees at work).
 - b. Possible restriction to work isolate (if possible),
 - c. Possible restriction to self-isolate at home for up to 14 days and/or obtain a documented negative COVID-19 test. NOTE: test results taken earlier than 6 days following return from travel are not acceptable, to allow for virus incubation period.
 - d. Company requests to stay home will require use of sick leave first if available, then vacation leave, then unpaid time off.

- v. Employees with vacation requests for later in the year may submit such requests on employee self-serve. Supervisors may approve the leave and travel. However, an employee's ability to take the leave will be subject to the pandemic rules in place at the time the leave is to be taken. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.

L. Schooling Consideration for Parents of Dependent Children Under Age 14

NEC recognizes the hardship on employees who have children who must be schooled at home during the pandemic. In consideration, NEC offers the following support to such employees who are the legal guardian of young children. Until Schools offer Face to Face learning, NEC will allow work from home as long as the following conditions are met:

1. Essential functions of the job can be performed from a home/remote workstation
2. Employee is able to perform productively from home
3. Employee is not too sick to perform job duties at home

M. Business Operations Modifications & Restrictions

- i. Members continue to be encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
- ii. As NEC has adequate drive through, telephone and online services, and so lobbies remain closed. However, the headquarters and subsequently the service center lobbies may be opened, with social distancing required, face coverings recommended, and limited occupancy, along with appropriate signage.
- iii. All public restrooms remain closed to members and the public in NEC facilities.
- iv. NEC may continue member disconnections for members who have not requested payment agreements or who have not met payment agreement terms. NEC continues to give extra consideration to hardship situations for member bill payment.
- v. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
- vi. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is a dangerous virus. **NEC employees must social distance (>6ft. apart) at all times while working.**
 1. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 2. Our service and field personnel must also employ "social distancing" (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.

3. If a work procedure prevents employees from social distancing 6 feet, then all employees involved in the procedure should wear face coverings at all times during the procedure, unless the face covering presents a safety hazard (e.g. fogging up glasses affecting visibility, etc.).
- vii. NEC shall distributing face coverings for all employees.
 1. If you have your own face coverings, these will need to be approved by HR or the Safety Manager.
 2. Face coverings are required when interacting with other employees, when social distancing is not possible.
 3. Face coverings are required in hallways and common areas of the co-op when social distancing ability cannot be predicted.
 4. Face coverings are required at all times when interacting with the public unless you are able to stay 6 feet apart.
 5. Additional face covering needs should be communicated to the supervisor and the Safety Manager.
- viii. NEC may begin to open, to a limited extent, employee gathering areas such as break rooms and fitness rooms in all facilities. Social distancing and face covers in break rooms are required at all times.
- ix. NEC meetings, in person, are discouraged but may be held if social distancing requirements can be met.
 1. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.
 2. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
 3. Face coverings should be worn at all times while entering and exiting training/common areas.
 4. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
- x. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be admitted into facilities for business reasons are required to complete the visitor health survey and if any answers are yes, should be denied admission. Forms completed and questions should be directed to human resources.
- xi. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase VIII- COVID-19 Pandemic: Updates for Face Coverings, Personal Travel and Employee Events

I. OBJECTIVE

It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during this pandemic. In this phase of action, communities are partially or fully open and there is community spread of the virus. Critical services, processes, and operations at the Co-op are vulnerable to interruption due to loss of personnel affected by the virus or various levels of exposure. Employees have challenges at home due to virtual schooling of children. As a critical business, in this phase, NEC expands processes to allow employees to work following some level of potential exposure to the virus, if they are asymptomatic, and with reasonable protections. NEC continues moves to follow CDC guidance for employers and critical infrastructure workers and any applicable orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus and available treatments. In this phase, NEC reduces required reporting of employee travel, clarifies the use of face coverings, and provides guidance for employee events.

II. DEFINITIONS

- S. Community Spread: the spread of an illness for which the source of infection is unknown.
- T. COVID-19 Rapid Test: a viral test process that provides results within minutes or hours. This test may have a lower accuracy if not performed properly by the testing center.
- U. COVID-19 Test: an FDA-approved viral test for COVID-19; uses respiratory droplets for the test (nasal swab or saliva); Note: a serological test (blood test for antibodies) is not acceptable to diagnose COVID 19.
- V. Face Coverings: a cloth face covering which should cover your mouth and nose while allowing you to breathe comfortably, which also minimizes the spread of droplets from you to others.
- W. Exposure Levels – employees shall report any of these exposure levels to HR
 - ix. Positive for COVID-19: employee is confirmed positive for COVID-19 via testing;
 - x. Exposure: employee or member of household was within 6 feet without a mask of an infected person (confirmed positive test for COVID-19) for at least 15

minutes within a timeframe starting from 48 hours before the person began feeling sick until the time the patient was isolated, or 14 days after the known exposure that resulted in the contracting of the virus.

- xi. Potential Exposure: employee was less than 6 feet for 15 minutes or more, without a mask, from a person who is being tested and awaiting results for COVID 19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic or begins with the date of the employee's know exposure and goes until 14 days following exposure.
- xii. Other Exposure Levels: employee or member of household was less than 6 feet for 15 minutes or more without a mask from another person who had potential exposure (see definition for "potential exposure" above).
- X. Investigation Day – single day in which employee does not report to work while an investigation is made regarding the exposure/risk level and the work restrictions that will be required for the employee.
- Y. Work Isolation: may be used by employees in certain jobs if there is an exposure and employee is asymptomatic/ able to work, or for a potential exposure; employee must avoid any physical interactions with other employees and work facilities; includes teleworking or isolation from other employees and facilities while continuing to work; may last up to 14 days.
- Z. Self-quarantine: means staying home, monitoring your health, and maintaining social distancing (at least 6 feet) from others at all times; generally, this lasts for 14 days from last exposure; employees may telework if possible until symptoms worsen.
- AA. Social Distancing: maintaining a distance of at least 6 feet from others; this is a CDC-recommended method to help limit the spread of a virus.

III. PROCEDURES

- b. All staffed employee work areas must have the following available to support regular infection control:
 - i. Disinfectant cleaning supplies and disposable towels
 - ii. Hand sanitizer
 - iii. Face covers
 - iv. Rubber gloves
 - v. Safety glasses and face shields will be available for specified tasks, as needed.
- c. **All NEC employees are required to adhere to infection control procedures at all times, as follows.** Signage and training will also be provided to all employees.
 - i. Required social distancing of 6 feet while in facilities or while working for NEC at all times.
 - ii. If in the course of work, social distancing cannot be ensured, face coverings are required. Face coverings must be worn for all interactions among employees and the public when social distancing cannot be ensured, unless the face covering presents a safety risk to the employee.

- iii. Employees who drive company vehicles should not have others in the vehicle with them in the course of performing work, and must not get in contractor or other public's vehicles in the course of work. If an employee must ride with another employee, both employees must wear face coverings while in the vehicle and shall ensure adequate ventilation in the vehicle by turning off recirculating air conditioning and opening windows slightly to allow air exchange. Employees should each wipe down contacted surfaces before and after travels and use other infection control practices (e.g. hand hygiene, cough etiquette, etc.).
 - iv. Hand hygiene- NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
 - v. Cough etiquette – cover cough at all times including while wearing face coverings
 - vi. Clean frequently touched surfaces- the cooperative cleans work areas in offices nightly, but employees are responsible to clear frequently touched surfaces throughout their work day.
 - vii. Employees must take temperature daily and complete employee health screening before entering work facilities.
 - viii. Notify your supervisor and go home if you are sick or have COVID 19 symptoms.
- d. Daily employee health surveys are required and/or temperature checks must be performed by NEC's HR Department.
- i. Health screenings may include the following:
 - 1. Temperature checks- self-reported or staff taken
 - 2. Health questionnaire
 - 3. Self-monitoring and reporting.
 - 4. Reasonable suspicion – other employees or manager report an employee with symptoms.
 - 5. Other CDC or Texas State Department of Health recommended methods
 - ii. All health screening records are documented and maintained as confidential information.
 - iii. All personnel performing physical health screenings (e.g. temperature checks) are required to wear a face shield, a face covering, prescription or safety glasses, and rubber gloves.
- e. Face Coverings

Social distancing is always the priority practice and the rule while in NEC facilities and while performing work for the Cooperative. Employees shall be mindful of the common space limitations, such as the breakroom, conference rooms, gym, and bathrooms.

NEC will supply face coverings – gators or surgical-style masks- to each employee. Employees are responsible for the cleaning/care and/or proper disposal of these

coverings. The masks which are reusable, should be laundered regularly, as trained. Employees are welcome to wear their own face coverings which adhere to NEC dress code guidelines.

- i. Face coverings must be worn when social distancing cannot be ensured (in combination with other measures including social distancing, cough etiquette and hand hygiene practices)
- ii. Non-business activities in the course of the work day which do not allow employees the ability to social distance are not allowed.
- iii. Face coverings are recommended for all interactions with others.
- iv. Face coverings are required for all interactions among employees and the public when social distancing cannot be ensured, unless the face covering presents a safety risk to the employee.
- v. Face coverings may be required for an employee at all times while working, following a reported “exposure,” “potential exposure” or “other level exposure.”
- vi. Face coverings are mandatory when:
 1. Anyone is entering or exiting the building. This applies to employees, members, customers, guests or contractors.
 2. Entering and exiting a conference or meeting room.
 3. You are walking through the building's common spaces including hallways, restrooms, breakroom, and Lobby.
 4. A member enters our Lobby. Anyone in the Lobby must also wear a face covering.
 5. Working outdoors in situations where social distancing cannot be maintained, unless it is unsafe to do so.
 6. Riding in a company vehicle with others who do not reside in the same household.
- vii. You may temporarily remove face coverings in these situations:
 1. When you are *alone* in your office, enclosed work area, or cubicle with walls that are higher than face level when social distancing is maintained
 - o When workspaces and cubicles meet this requirement, employees may remove their face coverings when *sitting* at their desks.
 - o You may need to wear a mask while using a stand-up desk if you cannot maintain least 6 feet of physical distance with others around you.
 2. When *sitting* down to eat in the breakroom, provided that at least 6 feet of physical distance is maintained between others.
 - o A mask is required as you walk to and from the breakroom and while using the kitchen area
 3. *Sitting* in a conference room, provided that at least 6 feet of physical distance is maintained between you and others

- You must wear your mask to and from the conference room until everyone is seated and put your mask back on before standing up to leave.
- 4. Driving a company vehicle alone or with someone from your same household.

f. Sick or Exposed to COVID 19

All employees are required to self-monitor for illness and COVID-19 symptoms during the pandemic. In addition, stringent social distancing and face coverings while working are required. These steps are required to help protect employees and limit the spread of the virus in the workplace.

- i. **If employees are sick**, they should stay home from work to (1) avoid bringing any virus into the workplace and (2) also to allow the employee to get the rest and care needed to get well.
 - 1. For extended leave beyond 3 days, employee should contact their healthcare provider and request a doctor's note to return to work;
 - 2. If employee has the symptoms of the flu or COVID-19, the employee should contact their healthcare provider, private testing site, or the health department to seek guidance regarding testing for COVID-19 and other guidance.
- ii. **If an employee tests positive for COVID-19**, this should be reported to HR immediately. HR will treat this information as confidential. The following actions shall be taken:
 - 1. If employee has no symptoms, employee must isolate at home until released by healthcare provider of for 10 days following the receipt of positive test result.
 - 2. If employee has symptoms, the employee must isolate at home until released by healthcare provider.
 - 3. NEC will deep clean and disinfect the area where the individual works.
 - 4. Contact Tracing
 - a. HR will ask the employee to trace their steps/actions taken to determine who that individual worked with in close proximity (<6 ft.) for 15 minutes since the time of exposure, if known, or 48 hours prior to the onset of symptoms.
 - b. HR will notify the employees who came in contact with the individual without using the employee's name.
 - c. NEC will monitor. Employees will be asked to wear face coverings and social distance, and/or work isolate or self-quarantine as each situation dictates depending on level of exposure/potential exposure.
- iii. **If employee had an exposure** (see definition Section II), employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self- quarantine shall be required for a period of 14 days following the exposure. If tested and once test results are confirmed, a discussion of any further necessary actions will be conducted with HR.
- iv. **If an employee has a potential exposure** (see definition Section II), employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self- quarantine may be required for 14 days or until test results are

known. Once test results are confirmed, a discussion of any further necessary actions will be conducted with HR. Self-monitoring, along with stringent social distancing and face coverings while working, are required.

- v. **If an employee has another level of exposure**, such as around someone who was identified as a close contact with potential exposure to a person with COVID-19 (as defined in section II), employees should immediately report this to their supervisor or HR. Employee should closely monitor him/herself for any symptoms of COVID-19. Depending on the situation, guidance may be that an employee does not need to self-quarantine or work isolate.
- vi. Employee with potential exposure or other level potential exposures (as indicated in Section II) may also be required to stay home for one investigation day, to review any exposure. HR will review the situation and advise employee for return-to-work.
- vii. Employee with exposure or potential exposure that occurred outside of work, may choose to be tested on their own, at their own expense. If exposure occurred at work, the Co-op will arrange/pay for any testing as appropriate.
- viii. Employees may be able to telework for work isolation/quarantine if (1) their work is able to be substantially done from home, and (2) if the employee is fever free (without medication) for 24 hours and is not so ill (or may become so ill) that productivity, safety or recovery may suffer if employee continues to work.

g. Returning to Work Following Illness or Quarantine

- i. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met:
 - 1. (1) at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and
 - 2. the individual has *improvement* in symptoms (e.g., cough, shortness of breath, etc.); and
 - 3. at least 10 days have passed *since symptoms first appeared*
 - 4. if no symptoms, employee may return to work on the 11th day following the receipt of the positive test results.
- ii. In the case of an employee or contract worker who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above
- iii. If the employee or contract worker has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a medical professional's note clearing the individual for return based on an alternative diagnosis.
- iv. If employee had potential exposure to someone being tested for COVID-19, the employee should stay home or remain in work isolation until, at least, the test results are known.
- v. If exposed to someone who tested positive for COVID-19, employee shall be sent home (or work isolate if possible and appropriate) for 14 days from date of last exposure or

employee may obtain a documented negative COVID-19 test (test results taken earlier than 6 days following exposure are not acceptable, to allow for virus incubation period).

- vi. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed (if the employee or member of household is ill), and finally unpaid time off.
- vii. Time off required for serious illness for employee, family member, or member of household will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
- viii. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.

h. Travel

NEC, along with the CDC, discourages personal travel throughout the globe at this time. The CDC recommends you stay home as much as possible, consider travel risks, and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

- i. NEC continues to cancel travel for company training and non-essential business travel through at least November 30, 2020.
- ii. Employees are advised to be aware of the level of community spread of COVID-19 and exercise caution in travels to any areas with high active community spread and when traveling with others outside their household. The CDC provides information to help evaluate travel risks at <https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-risk.html> . Employees are encouraged to practice social distancing, hand hygiene, cough etiquette, surface cleaning, and proper wearing of face coverings in their personal travels.
- iii. Employees who return to work following medium to high risk travel (according to the CDC website above) should strictly follow social distancing, hand hygiene, cough etiquette, surface cleaning, and proper wearing of face coverings for 14 days following their return from their travels.
- iv. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions including extra vacation time off for investigation days.

i. Schooling Consideration for Parents of Dependent Children Under Age 14

NEC recognizes the hardship on employees who have children who must be schooled at home during the pandemic. In consideration, NEC offers the following support to such employees who are the legal guardian of young children. Until Schools offer Face-to-Face learning, NEC will allow work from home as long as the following conditions are met:

1. Essential functions of the job can be performed from a home/remote workstation
2. Employee is able to perform productively from home
3. Employee is not too sick to perform job duties at home

I. Business Operations Modifications & Restrictions

- ii. Members continue to be encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
- iii. As NEC has adequate drive through, telephone and online services, and so lobbies remain closed. However, the headquarters and subsequently the service center lobbies may be opened, with social distancing required, face coverings recommended, and limited occupancy, along with appropriate signage.
- iv. All public restrooms remain closed to members and the public in NEC facilities.
- v. NEC may continue member disconnections for members who have not requested payment agreements or who have not met payment agreement terms. NEC continues to give extra consideration to hardship situations for member bill payment.
- vi. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
- vii. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is a dangerous virus. **NEC employees must social distance (>6ft. apart) at all times while working.**
 1. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 2. Our service and field personnel must also employ "social distancing" (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
 3. If a work procedure prevents employees from social distancing 6 feet, then all employees involved in the procedure should wear face coverings at all times during the procedure, unless the face covering presents a safety hazard (e.g. fogging up glasses affecting visibility, etc.).
- viii. NEC may continue to open, to a limited extent, employee gathering areas such as break rooms and fitness rooms in all facilities. Social distancing and face covers in break rooms are required at all times.
- ix. NEC meetings and events, in person, are discouraged but may be held if social distancing and face covering requirements can be met.
 1. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.

2. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
3. Face coverings should be worn at all times while entering and exiting training/common areas.
4. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
5. Employee meetings and activities may be held with strict adherence to infection control practices outlined in this policy in addition to the following considerations:
 - i. Organizers must ensure attendees are able to social distance at event. If seating is provided, ushers should be designated to ensure at least two chairs between members of different households while seated/eating. If tables are less than 6 feet deep, attendees should also be staggered to not be directly across from non-household attendees.
 - ii. Organizers should make every effort to hold events outdoors and/or in well ventilated areas to reduce potential closed area spread of viruses.
 - iii. For employee events, food should be served in/on single containers/plates. The use of self-serve buffets is not allowed. Buffets may be used with designated trained servers handling the food using proper food handling procedures.
 - iv. Face coverings, hand sanitizer and disinfecting wipes must be made easily accessible and available to all attendees.
 - v. Face coverings must be worn in accordance with Section III.D. of this policy.
 - vi. Temperature checks and health questionnaires are required of all attendees and will be arranged with and performed by members of the NEC Human Resources Department. All information will be treated as confidential information. Any attendee with a negative survey and/or a temperature above 100 degrees F will not be admitted to the event.
 - f) Attendees who refuse to adhere to the infection control practices during the event will be warned one time. Continued violation of the practices will result in the removal of the attendee from the event.
- x. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be admitted into facilities for business reasons are required to complete the visitor health survey and if any answers are yes, should be denied admission. Forms completed and questions should be directed to human resources.
- xi. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase IX- COVID-19 Pandemic: Approaching Herd Immunity

I. OBJECTIVE

It is NEC's objective to take reasonable precautions to protect NEC employees from the COVID-19 virus during this pandemic. In this phase of action, communities are almost completely open. While community spread remains, many have received vaccinations and some geographic regions are approaching herd immunity from the virus. The majority of employees are vaccinated against the virus. Critical services, processes, and operations at the Co-op are significantly less vulnerable to interruption due to loss of personnel affected by the virus or various levels of exposure. Employees may continue to have challenges at home due to virtual schooling as vaccinations for children are not available or not widespread. As a critical business, NEC allows employees to work following some level of potential exposure to the virus, if they are asymptomatic, and with reasonable protections. NEC continues to follow CDC guidance for employers and critical infrastructure workers and any applicable orders of federal, state and local government bodies. Progress or regression from this phase may occur at any time and is determined by the spread of the virus and available vaccines and therapeutic treatments. In this phase, NEC reduces required reporting of employee travel, clarifies the use of face coverings, and provides guidance for employee events.

II. DEFINITIONS

BB. Community Spread: the spread of an illness for which the source of infection is unknown.

CC. COVID-19 Rapid Test: a viral test process that provides results within minutes or hours. This test may have a lower accuracy if not performed properly by the testing center.

DD. COVID-19 Test: an FDA-approved viral test for COVID-19; uses respiratory droplets for the test (nasal swab or saliva); Note: a serological test (blood test for antibodies) is not acceptable to diagnose COVID 19.

EE. Face Coverings: a cloth face covering which should cover your mouth and nose while allowing you to breathe comfortably, which also minimizes the spread of droplets from you to others.

FF. Exposure Levels – employees shall report any of these exposure levels to HR

xiii. Positive for COVID-19: employee is confirmed positive for COVID-19 via testing;

- xiv. Exposure: employee or member of household was within 6 feet without a mask of an infected person (confirmed positive test for COVID-19) for at least 15 minutes within a timeframe starting from 48 hours before the person began feeling sick until the time the patient was isolated, or 14 days after the known exposure that resulted in the contracting of the virus.
 - xv. Potential Exposure: employee was less than 6 feet for 15 minutes or more, without a mask, from a person who is being tested and awaiting results for COVID 19. The timeframe for having contact with an individual includes the period of time of 48 hours before the individual became symptomatic or begins with the date of the employee's know exposure and goes until 14 days following exposure.
 - xvi. Other Exposure Levels: employee or member of household was less than 6 feet for 15 minutes or more without a mask from another person who had potential exposure (see definition for "potential exposure" above).
- GG. Investigation Day – single day in which employee does not report to work while an investigation is made regarding the exposure/risk level and the work restrictions that will be required for the employee, if at the end of vacation, this will be an extra day of vacation time.
- HH. Work Isolation: may be used by employees in certain jobs if there is an exposure and employee is asymptomatic/ able to work, or for a potential exposure; employee must avoid any physical interactions with other employees and work facilities; includes teleworking or isolation from other employees and facilities while continuing to work; may last up to 14 days.
- II. Self-quarantine: means staying home, monitoring your health, and maintaining social distancing (at least 6 feet) from others at all times; generally, this lasts for 14 days from last exposure; employees may telework if possible until symptoms worsen.
- JJ. Social Distancing: maintaining a distance of at least 6 feet from others; this is a CDC-recommended method to help limit the spread of a virus.

III. PROCEDURES

- j. All staffed employee work areas shall have the following available to support regular infection control:
 - i. Disinfectant cleaning supplies and disposable towels
 - ii. Hand sanitizer
 - iii. Face covers
 - iv. Rubber gloves
 - v. Safety glasses and face shields will be available for specified tasks, as needed.
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 - i. Required social distancing of 6 feet while in facilities or while working for NEC at all times.

- ii. If in the course of work, social distancing cannot be ensured, face coverings are required. Face coverings must be worn for all interactions among employees and the public when social distancing cannot be ensured, unless the face covering presents a safety risk to the employee.
 - iii. Employees who drive company vehicles should not have others in the vehicle with them in the course of performing work, and must not get in contractor or other public's vehicles in the course of work. If an employee must ride with another employee, both employees must wear face coverings while in the vehicle and shall ensure adequate ventilation in the vehicle by turning off recirculating air conditioning and opening windows slightly to allow air exchange. Employees should each wipe down contacted surfaces before and after travels and use other infection control practices (e.g. hand hygiene, cough etiquette, etc.).
 - iv. Hand hygiene- NEC employees should wash hands often with soap and water for at least 20 seconds, or use hand sanitizer with at least 60% alcohol, especially after going to the bathroom, before eating, and after blowing your nose, coughing, or sneezing.
 - v. Cough etiquette – cover cough at all times including while wearing face coverings
 - vi. Clean frequently touched surfaces- the cooperative cleans work areas in offices nightly, but employees are responsible to clear frequently touched surfaces throughout their work day.
 - vii. Employees must take temperature daily and complete employee health screening before entering work facilities.
 - viii. Notify your supervisor and go home if you are sick or have COVID 19 symptoms.
- l. Daily employee health surveys are required and/or temperature checks must be performed by NEC's HR Department.
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 - ii. All health screening records are documented and maintained as confidential information.
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space limitations, such as the breakroom, conference rooms, gym, and bathrooms.

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- vi. Face coverings are mandatory when:
 - 7. Anyone is entering or exiting the building. This applies to employees, members, customers, guests or contractors.
 - 8. Entering and exiting a conference or meeting room.
 - 9. You are walking through the building's common spaces including hallways, restrooms, breakroom, and Lobby.
 - 10. A member enters our Lobby. Anyone in the Lobby must also wear a face covering.
 - 11. Working outdoors in situations where social distancing cannot be maintained, unless is it unsafe to do so.
 - 12. Riding in a company vehicle with others who do not reside in the same household.
- vii. You may temporarily remove face coverings in these situations:
 - 5. When you are *alone* in your office, enclosed work area, or cubicle with walls that are higher than face level when social distancing is maintained
 - o When workspaces and cubicles meet this requirement, employees may remove their face coverings when *sitting* at their desks.
 - o You may need to wear a mask while using a stand-up desk if you cannot maintain least 6 feet of physical distance with others around you.
 - 6. When *sitting* down to eat in the breakroom, provided that at least 6 feet of physical distance is maintained between others.

- A mask is required as you walk to and from the breakroom and while using the kitchen area
- 7. *Sitting* in a conference room, provided that at least 6 feet of physical distance is maintained between you and others
 - You must wear your mask to and from the conference room until everyone is seated and put your mask back on before standing up to leave.
- 8. Driving a company vehicle alone or with someone from your same household.

n. Sick or Exposed to COVID 19

All employees are required to self-monitor for illness and COVID-19 symptoms during the pandemic. In addition, stringent social distancing and face coverings while working are required. These steps are required to help protect employees and limit the spread of the virus in the workplace.

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 - b. HR will notify the employees who came in contact with the individual without using the employee's name.
 - c. NEC will monitor. Employees will be asked to wear face coverings and social distance, and/or work isolate or self-quarantine as each situation dictates depending on level of exposure/potential exposure.
- iii. **If employee had an exposure** (see definition Section II), employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self- quarantine shall be required for a period of 14 days following the exposure.

If tested and once test results are confirmed, a discussion of any further necessary actions will be conducted with HR.

- iv. **If an employee has a potential exposure** (see definition Section II), employee should immediately report this to their supervisor or HR. Work isolation (if possible) or self-quarantine may be required for 14 days or until test results are known. Once test results are confirmed, a discussion of any further necessary actions will be conducted with HR. Self-monitoring, along with stringent social distancing and face coverings while working, are required.
 - v. **If an employee has another level of exposure**, such as around someone who was identified as a close contact with potential exposure to a person with COVID-19 (as defined in section II), employees should immediately report this to their supervisor or HR. Employee should closely monitor him/herself for any symptoms of COVID-19. Depending on the situation, guidance may be that an employee does not need to self-quarantine or work isolate.
 - vi. Employee with potential exposure or other level potential exposures (as indicated in Section II) may also be required to stay home for one investigation day, to review any exposure. HR will review the situation and advise employee for return-to-work.
 - vii. Employee with exposure or potential exposure that occurred outside of work, may choose to be tested on their own, at their own expense. If exposure occurred at work, the Co-op will arrange/pay for any testing as appropriate.
 - viii. Employees may be able to telework for work isolation/quarantine if (1) their work is able to be substantially done from home, and (2) if the employee is fever free (without medication) for 24 hours and is not so ill (or may become so ill) that productivity, safety or recovery may suffer if employee continues to work.
- o. Returning to Work Following Illness or Quarantine
- i. In the case of an employee or contractor who was diagnosed with COVID-19, the individual may return to work when all three of the following criteria are met:
 - 1. (1) at least 3 days (72 hours) have passed *since recovery* (resolution of fever without the use of fever-reducing medications); and
 - 2. the individual has *improvement* in symptoms (e.g., cough, shortness of breath, etc.); and
 - 3. at least 10 days have passed *since symptoms first appeared*
 - 4. if no symptoms, employee may return to work on the 11th day following the receipt of the positive test results.
 - ii. In the case of an employee or contract worker who has symptoms that could be COVID-19 and does not get evaluated by a medical professional or tested for COVID-19, the individual is assumed to have COVID-19, and the individual may not return to work until the individual has completed the same three-step criteria listed above
 - iii. If the employee or contract worker has symptoms that could be COVID-19 and wants to return to work before completing the self-isolation period, the individual must obtain a medical professional's note clearing the individual for return based on an alternative diagnosis.

- iv. If employee had potential exposure to someone being tested for COVID-19, the employee should stay home or remain in work isolation until, at least, the test results are known.
- v. If exposed to someone who tested positive for COVID-19, employee shall be sent home (or work isolate if possible and appropriate) for 14 days from date of last exposure or employee may obtain a documented negative COVID-19 test (test results taken earlier than 6 days following exposure are not acceptable, to allow for virus incubation period).
- vi. Time off required for quarantine/self-isolation will be paid from the employee's leave banks - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed (if the employee or member of household is ill), and finally unpaid time off.
- vii. Time off required for serious illness for employee, family member, or member of household will be paid in accordance with Company sick leave policy from the employee's sick leave bank. If available leave is exhausted, - use of sick leave first, if available, then vacation leave, then if employee has joined the catastrophic leave pool any time available/needed, then unpaid time off.
- viii. If COVID-19 illness develops for the employee or a member of their household, employee may qualify for Family and Medical Leave and special benefits may be available. Employees should contact HR for more information.

p. Travel

NEC, along with the CDC, discourages personal travel throughout the globe at this time. The CDC recommends you stay home as much as possible, consider travel risks, and practice social distancing. Traveling to visit friends and family increases your chances of getting and spreading COVID-19. It is possible for someone to have COVID-19 and spread it to others, even if they have no symptoms. Getting infected may be especially dangerous if you or your loved ones are at higher risk for severe complications from COVID-19. People at higher risk for complications do need to take extra precautions. Although it can be hard to remain apart from loved ones during challenging or stressful times, try to connect with them in other ways, using video chats or phone calls.

- i. NEC continues to cancel travel for company training and non-essential business travel through at least November 30, 2020.
- ii. Employees are advised to be aware of the level of community spread of COVID-19 and exercise caution in travels to any areas with high active community spread and when traveling with others outside their household. The CDC provides information to help evaluate travel risks at <https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-risk.html> . Employees are encouraged to practice social distancing, hand hygiene, cough etiquette, surface cleaning, and proper wearing of face coverings in their personal travels.
- iii. Employees who return to work following medium to high risk travel (according to the CDC website above) should strictly follow social distancing, hand hygiene, cough etiquette, surface cleaning, and proper wearing of face coverings for 14 days following their return from their travels.
- iv. As long as the pandemic continues and/or there is an emergency declaration, all vacation requests approved are subject to cancellation or additional restrictions.

q. Schooling Consideration for Parents of Dependent Children Under Age 14

NEC recognizes the hardship on employees who have children who must be schooled at home during the pandemic. In consideration, NEC offers the following support to such employees who are the legal guardian of young children. **Until** Schools offer Face-to-Face learning, NEC will allow work from home as long as the following conditions are met:

- i. Essential functions of the job can be performed from a home/remote workstation
- ii. Employee is able to perform productively from home
- iii. Employee is not too sick to perform job duties at home

I. Business Operations Modifications & Restrictions

- i. Members continue to be encouraged to pay bills, start service, and conduct all other necessary business through our free SmartHub app, NEC CE's online portal, our website, by phone, the night deposit, or the drive-through. Members are encouraged to do business by phone to keep drive-thru wait times down.
- ii. As NEC has adequate drive through, telephone and online services, and so lobbies remain closed. However, the headquarters and subsequently the service center lobbies may be opened, with social distancing required, face coverings recommended, and limited occupancy, along with appropriate signage.
- iii. All public restrooms remain closed to members and the public in NEC facilities.
- iv. NEC may continue member disconnections for members who have not requested payment agreements or who have not met payment agreement terms. NEC continues to give extra consideration to hardship situations for member bill payment.
- v. NEC continues extra cleaning of all workspaces and vehicles, however employees must also be vigilant to clean and disinfect frequently touched objects and surfaces using a household cleaning spray or wipe, provided.
- vi. All employees are required to maintain social distancing of 6 feet in dealing with coworkers/ members/public while working. COVID-19 can be carried for many days by seemingly healthy individuals, this is a dangerous virus. **NEC employees must social distance (>6ft. apart) at all times while working.**
 1. If a coworker/member/public does not respect distancing requests, employees are directed to leave the area and report to their supervisor.
 2. Our service and field personnel must also employ "social distancing" (of at least 6 feet) in dealing with the public. If a member of the public continues to approach after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that member/consumer will be contacted by phone regarding further arrangements. Notify dispatch of the issue.
 3. If a work procedure prevents employees from social distancing 6 feet, then all employees involved in the procedure should wear face coverings at all times during the procedure, unless the face covering presents a safety hazard (e.g. fogging up glasses affecting visibility, etc.).
- vii. NEC may continue to open, to a limited extent, employee gathering areas such as break rooms and fitness rooms in all facilities. Social distancing and face covers in break rooms are required at all times.
- viii. NEC meetings and events, in person, are discouraged but may be held if social distancing and face covering requirements can be met.

1. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.) whenever possible.
2. If necessary, meetings among a small group of employees in NEC offices may be held, but provisions to wear facial coverings and ensure social distancing of at least 6 feet apart must be met.
3. Face coverings should be worn at all times while entering and exiting training/common areas.
4. Employees should follow local, state, and federal ordinances regarding public gatherings and business capacity limits while continuing to social distance.
5. Employee meetings, activities and events shall include the following considerations:
 - i. If the event is held at an external venue, organizers shall enforce/follow the venue's required safety precautions and these shall be communicated to attendees before the event so employees may decide if protections are acceptable before they attend the event.
 - ii. For events on NEC property, organizers must ensure attendees are able to social distance at event. If seating is provided, ushers should be designated to ensure at least two chairs between members of different households while seated/eating. If tables are less than 6 feet deep, attendees should also be staggered to not be directly across from non-household attendees.
 - iii. Organizers should make every effort to hold events outdoors and/or in well ventilated areas to reduce potential closed area spread of viruses.
 - iv. For employee events, tickets to third-party event food vendors should be provided or food should be served in/on single containers/plates. The use of self-serve buffets is not allowed. Buffets may be used with designated trained servers handling the food using proper food handling procedures.
 - v. Face coverings, hand sanitizer and disinfecting wipes must be made easily accessible and available to all attendees during the event.
 - vi. Face coverings must be worn in accordance with Section III.D. of this policy or per external venue policy.
 - vii. Health surveys/questionnaires and/or temperature checks will be required of all attendees. The legal guardian of any minors must complete the health surveys. Organizer must coordinate with the NEC HR Department in advance for surveys and/or temperature checks. All information will be treated as confidential information. Any attendee with a negative survey and/or a temperature above 100 degrees F, as applicable, will not be allowed to tend the event.
 - f) Organizers are responsible for enforcing the above requirements during the event. Attendees who refuse to adhere to the venue or NEC infection control practices during the event will be warned one time. Continued violation of the practices will result in the removal of the attendee from the event.
- ix. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance and wear face coverings. Those to be

admitted into facilities for business reasons are required to complete the visitor health survey and if any answers are yes, should be denied admission. Forms completed and questions should be directed to human resources.

- x. Staggered schedules, individual vehicles, and other job adjustments to support distancing of employees in facilities continue to be implemented.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established policies and all other material in conflict with its provisions.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase X- COVID-19 Pandemic: Variant Surge

I. OBJECTIVE & APPLICABILITY

This policy replaces Policy No. 9 for the COVID-19 Pandemic. This policy should be used in combination with Policy No. 8. This policy applies to employees who are fully vaccinated against COVID-19 and have verified their current and full vaccination with the NEC HR Department. This policy is provided in accordance with new guidance from the National Center for Disease Control (CDC) as a result of its *Interim Guidance from the CDC regarding Interim Public Health Recommendations for Fully Vaccinated People* dated July 28, 2021. NEC continues to enforce the Emergency Pandemic Policy 8-Phase VIII- COVID-19, with the exceptions for NEC verified, fully vaccinated employees as indicated in this policy. NEC Emergency-Pandemic Policy 8 and 10 are enforced together at this time.

The CDC guidance states:

“Currently authorized vaccines in the United States are highly effective at protecting vaccinated people against symptomatic and severe COVID-19. Fully vaccinated people are less likely to become infected and, if infected, to develop symptoms of COVID-19. They are at substantially reduced risk of severe illness and death from COVID-19 compared with unvaccinated people. Infections in fully vaccinated people (breakthrough infections) happen in only a small proportion of people who are fully vaccinated, even with the Delta variant. Moreover, when these infections occur among vaccinated people, they tend to be mild. However, preliminary evidence suggests that fully vaccinated people who do become infected with the Delta variant can be infectious and can spread the virus to others.

For the purposes of this guidance, people are considered fully vaccinated for COVID-19 ≥ 2 weeks after they have received the second dose in a 2-dose series (Pfizer-BioNTech or Moderna), or ≥ 2 weeks after they have received a single-dose vaccine (Johnson & Johnson [J&J]/Janssen)[†]. There is currently no post-vaccination time limit on fully vaccinated status. People are considered not fully vaccinated if they have not completed a two-dose vaccination series or have not received a single-dose vaccine, regardless of age, including children under the age of 12.

Data suggest immune response to COVID-19 vaccination might be reduced in some immunocompromised people including, but not limited to, people receiving chemotherapy for cancer, people with hematologic cancers such as chronic lymphocytic leukemia, people receiving stem cells or organ transplants, people receiving hemodialysis, and people using certain medications that might blunt the immune response to vaccination (e.g., mycophenolate, rituximab, azathioprine, anti-CD20 monoclonal antibodies, Bruton tyrosine kinase inhibitors).

People who are immunocompromised should be counseled about the potential for reduced immune responses to COVID-19 vaccines and the need to continue to follow current prevention measures (including wearing a mask, staying 6 feet apart from others they don't live with, and avoiding crowds and poorly ventilated indoor spaces) to protect themselves against COVID-19 until advised otherwise by their healthcare provider. Close contacts of immunocompromised people should also be encouraged to be vaccinated against COVID-19."

Note: All italicized text within this policy represents direct verbiage from the CDC guidance provided at <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html>

III. **PROCEDURES**

A. Summary of CDC Guidance Changes.

- a. *Updated information for fully vaccinated people given new evidence on the B.1.617.2 (Delta) variant currently circulating in the United States.*
- b. *Added a recommendation for fully vaccinated people to wear a mask in public indoor settings in areas of substantial or high transmission (<https://covid.cdc.gov/covid-data-tracker/#county-view>)*
- c. *Added information that fully vaccinated people might choose to wear a mask regardless of the level of transmission, particularly if they are immunocompromised or at increased risk for severe disease from COVID-19 (<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>), or if they have someone in their household who is immunocompromised, at increased risk of severe disease or not fully vaccinated.*
- d. *Added a recommendation for fully vaccinated people who have a known exposure to someone with suspected or confirmed COVID-19 to be tested 3-5 days after exposure, and to wear a mask in public indoor settings for 14 days or until they receive a negative test result.*
- e. *CDC recommends universal indoor masking for all teachers, staff, students, and visitors to schools, regardless of vaccination status.*

B. Recommendations for Indoor and Outdoor Settings

Risk of SARS-CoV-2 infection is minimal for fully vaccinated people. The risk of SARS-CoV-2 transmission from fully vaccinated people to unvaccinated people is also reduced. Therefore, fully vaccinated people can resume activities without wearing a mask or physically distancing, except where required by federal, state, local, tribal, or territorial laws, rules, and regulations, including local business and workplace guidance. Fully vaccinated people should also continue to wear a well-fitted mask in correctional facilities and homeless shelters. Prevention measures are still recommended for unvaccinated people.

NEC Policy:

1. *All Employees:*

- NEC continues to require all employees to social distance a minimum of 6 feet at all times- indoors and outdoors.

2. *Unvaccinated employees of NEC:*

- Whether indoors or outdoors, when unvaccinated employees cannot social distance in the course of their work or other NEC activities, these employees must wear face coverings provided by or approved by the NEC Safety & Loss Control Manager.
3. ***Fully vaccinated employees of NEC, who have had their current, full vaccination verified with NEC's HR Department:***
- When indoors, and in a county with substantial or high transmission rates (<https://covid.cdc.gov/covid-data-tracker/#county-view>), fully vaccinated employees must wear face coverings in indoor public areas. This includes when entering and exiting buildings and meeting rooms, and when they cannot ensure social distancing indoors.
 - Fully vaccinated employees do not need to wear a mask outdoors. However, fully vaccinated people might choose to wear a mask in crowded outdoor settings if they or someone in their household is immunocompromised.
 - Fully vaccinated employees may choose to wear a mask regardless of the level of transmission, particularly if they are immunocompromised or at increased risk for severe disease from COVID-19, or if they have someone in their household who is immunocompromised, at increased risk of severe disease or not fully vaccinated.
 - Fully vaccinated people who have a known exposure to someone with suspected or confirmed COVID-19 must be tested 3-5 days after exposure, and wear a mask in public indoor settings for 14 days or until they receive a negative test result.

C. Travel (This section is the same as in Policy 9)

Fully vaccinated travelers are less likely to get and spread SARS-CoV-2 and can now travel at low risk to themselves within the United States. International travelers need to pay close attention to the situation at their international destinations before traveling due to the spread of new variants and because the burden of COVID-19 varies globally.

CDC prevention measures continue to apply to all travelers, including those who are vaccinated. All travelers are required to wear a mask on all planes, buses, trains, and other forms of public transportation traveling into, within, or out of the United States and in U.S. transportation hubs such as airports and stations.

1. Domestic travel (within the United States or to a U.S. territory)

- *Fully vaccinated travelers do not need to get a SARS-CoV-2 viral test before or after domestic travel, unless testing is required by local, state, or territorial health authorities.*
- *Fully vaccinated travelers do not need to self-quarantine following domestic travel.*

2. International travel

- *Fully vaccinated travelers do not need to get tested before leaving the United States unless required by their destination.*
- *Fully vaccinated air travelers coming to the United States from abroad, including U.S. citizens, are still required to have a negative SARS-CoV-2 viral test result or documentation of recovery from COVID-19 before they board a flight to the United States.*

- *International travelers arriving in the United States are still recommended to get a SARS-CoV-2 viral test 3-5 days after travel regardless of vaccination status.*
- *Fully vaccinated travelers do not need to self-quarantine in the United States following international travel.*

NEC Policy: Verified, fully vaccinated employees may travel for approved in-person company training within the United States. Fully vaccinated employees should follow the CDC guidance above for all other personal travel. Verified, fully vaccinated employees returning from international travel are not required to take an extra investigation day following such travel, but must immediately report any exposure to someone who tested positive for COVID-19 or variant to their supervisor and HR.

D. Recommendations for Isolation, Quarantine and Testing

1. Fully vaccinated people with COVID-19 symptoms

Although the risk that fully vaccinated people could become infected with COVID-19 is low, any fully vaccinated person who experiences symptoms consistent with COVID-19 should isolate themselves from others, be clinically evaluated for COVID-19, and tested for SARS-CoV-2 if indicated. The symptomatic fully vaccinated person should inform their healthcare provider of their vaccination status at the time of presentation to care.

2. Fully vaccinated people with no COVID-like symptoms following an exposure to someone with suspected or confirmed COVID-19

Fully vaccinated people should be tested 3-5 days following a known exposure to someone with suspected or confirmed COVID-19 and wear a mask in public indoor settings for 14 days or until they receive a negative test result. They should isolate if they test positive. Fully vaccinated people who live in a household with someone who is immunosuppressed, at increased risk of severe disease, or unvaccinated (including children <12 years of age) could also consider masking at home for 14 days following a known exposure or until they receive a negative test result. Most fully vaccinated people with no COVID-like symptoms do not need to quarantine or be restricted from work following an exposure to someone with suspected or confirmed COVID-19, if they follow the testing and masking recommendation above.

Fully vaccinated people should monitor for symptoms of COVID-19 for 14 days following an exposure.

3. Fully vaccinated people with no COVID-19-like symptoms and no known exposure to someone with suspected or confirmed COVID-19

It is recommended that fully vaccinated people with no COVID-19-like symptoms and no known exposure should be exempted from routine screening testing programs, if feasible.

NEC Policy: The above recommendations from the CDC guidance will also apply to fully vaccinated NEC employees. Verified (by NEC HR) fully vaccinated employees are exempted

from daily health screening questionnaires, but (2) are required to complete the health screening in the following circumstances:

- The fully vaccinated NEC employee who has been exposed to someone who is suspected or confirmed COVID-19 positive should complete the NEC health survey for all workdays in the 14 days following the exposure.
- The fully vaccinated NEC employee who has been exposed to someone who is suspected or confirmed COVID-19 positive should be tested 3-5 days following the known exposure.
- The fully vaccinated NEC employee who has been exposed to someone who is suspected or confirmed COVID-19 positive should wear a mask in public indoor settings for 14 days following exposure or until they receive a negative test result.
- If a fully vaccinated NEC employee has symptoms that could be associated with COVID-19 that person should not report to work with such symptoms, reporting the absence to their supervisor. The employee should also complete the health screening on the first three workdays following their return. Additional days of health screening completion may be required, as directed by HR.

E. Member Access to Services and Lobbies

NEC Policy: Due to the change in general public CDC guidance, NEC is returning to its mandatory face coverings and social distancing requirements in our member and public areas. Face coverings and social distancing signage will be changed to reflect that such protections are required.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established emergency pandemic policies, except *Emergency Pandemic Policy 8 and Policies 8 and 10 are enforced now together.*

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase XI- COVID-19 Pandemic: Verified, Fully Vaccinated Employee Face Mask Exemption for Reduced Community Spread

I. OBJECTIVE & APPLICABILITY

This policy applies to employees who are fully vaccinated against COVID-19 and have verified their current and full vaccination with the NEC HR Department. NEC continues to enforce the Emergency Pandemic Policy 8-Phase VIII- COVID-19, with the exceptions for NEC verified, fully vaccinated employees as indicated in this policy. NEC Emergency-Pandemic Policy 8 and 11 are enforced together at this time.

III. PROCEDURES

F. Summary of NEC Policy Changes.

Fully vaccinated people (verified by NEC's HR department) can:

- *Resume activities without wearing masks, except where required by federal, state, local, tribal, or territorial laws, rules and regulations, including local business and workplace guidance.*

For now, NEC-verified, fully vaccinated employees should continue to:

- *Get tested if experiencing COVID-19 symptoms.*
- *Follow CDC and health department travel requirements/recommendations.*

G. Indoor and Outdoor Settings

Fully vaccinated employees of NEC, who have had their current, full vaccination verified with NEC's HR Department, now have the option of no longer wearing face coverings.

- NEC continues to require all employees to social distance whenever possible, use cough etiquette, good hand hygiene, and clean frequently touched surfaces prior to touching.
- If employees are indoors - in break areas or meeting spaces - where social distancing cannot be maintained, and a participating employee requests that employees all wear face coverings, NEC expects employees to respectfully honor such requests. Such requests may be considered, but are not required to be honored, if made in other areas of the co-op or outdoors.

H. Travel

1. NEC employees traveling for work will need to follow all requirements of federal, state, local, tribal, or territorial laws, rules and regulations, including local business and workplace guidance. This may include mask and/or vaccination mandates depending on the location. Employees should review such requirements prior to registering for any training so that such requirements may be followed. Requests for reasonable accommodations will be considered.
2. Verified, fully vaccinated employees may travel for approved in-person company training within the United States. Fully vaccinated employees should follow the CDC guidance for all other personal travel. Verified, fully vaccinated employees returning from international travel are not required to take an extra investigation day following such travel.

I. Isolation, Quarantine and Testing

1. Fully vaccinated NEC employees with COVID 19 symptoms are expected to isolate and stay home, reporting the absence to their supervisor.
2. Fully vaccinated NEC employees exposed to COVID 19 with no symptoms do not need to quarantine or be isolated from work. They should closely monitor for symptoms for 14 days following an exposure.
3. Fully vaccinated employees (verified by NEC HR) are exempted from daily health screening questionnaires, but are required to complete the health screening in the following circumstances:
 - The fully vaccinated NEC employee who has been exposed to someone who is suspected or confirmed COVID-19 positive should complete the NEC health survey for all workdays in the 14 days following the exposure.
 - If a fully vaccinated NEC employee has symptoms that could be associated with COVID-19 that person should not report to work with such symptoms, reporting the absence to their supervisor. The employee should also complete the health screening on the first three workdays following their return. Additional days of health screening completion may be required, as directed by HR.

J. Visitor & Contractor Access to NEC Facilities

1. Visitors and contract workers have the option to verify their fully vaccinated status with NEC's HR department and be exempted from wearing a mask indoors and from taking the health screening questionnaire.
2. Visitors and contractors to social distance whenever possible, use cough etiquette, good hand hygiene, and clean frequently touched surfaces prior to touching.
3. Managers who host these individuals, must insure they comply with the verification process with HR, or ensure the visitors/contractors wear face masks and complete and clear the daily health questionnaire with HR.

K. Member Access to Services and Lobbies

Member face coverings and social distancing signage shall reflect that such protections are recommended, though not required.

III. **RESPONSIBILITY**

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established emergency pandemic policies, except *Emergency Pandemic Policy 8*.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

NUECES ELECTRIC COOPERATIVE, INC.

OPERATING POLICY

Scope:	OPERATING POLICY
Subject:	Phase XII- COVID-19 Pandemic: Emerging Milder Variants

I. OBJECTIVE & APPLICABILITY

This policy applies to all NEC employees. In this phase, variants with less severe illness are prevalent. NEC will follow CDC Guidance and federal, state and local laws, but more personal responsibility for protection is the focus. At-risk employees, contractors, and visitors are particularly vulnerable to the virus in this phase.

II. PROCEDURES

A. All employees in the workplace

- a. Social distance 6 feet at all times, inside and outside. All employees must wear face coverings when social distancing cannot be ensured indoors.
- b. Practice good hand hygiene and cough etiquette.
- c. Clean frequently touched surfaces.
- d. Report to supervisor and HR any known exposures to COVID 19 positive individuals and if you have tested positive.
- e. The Daily Health Survey
 - i. The daily health survey should be completed by all employees who have not verified their fully vaccinated status with HR.
 - ii. Fully vaccinated employees, as verified by NEC HR, do not need to complete the daily health survey.
 - iii. Any employee may be required to complete the health survey if they've been directed to do so by Human Resources, following exposure or illness.
- f. Face Coverings
 - i. All employees who have not verified their fully vaccinated status with HR must wear a face covering at all times inside NEC facilities.
 - ii. If employees are indoors - in break areas or meeting spaces - where social distancing cannot be maintained, and a participating employee requests that employees all wear face coverings, NEC expects employees to respectfully honor

such requests. Such requests may be considered, but are not required to be honored, if made in other areas of the co-op or outdoors.

- iii. All employees must wear face coverings when social distancing cannot be ensured indoors.

B. Visitors and Contractors

- a. Are expected to social distance whenever possible, use cough etiquette, good hand hygiene, and clean frequently touched surfaces prior to touching.
- b. Visitors and contractors who have not verified their fully vaccinated status with HR and who will be inside NEC facilities, must complete the daily survey.
- c. Facility visitors and contractors who have not verified their fully vaccinated status with HR must wear a face covering at all times inside NEC facilities around NEC employees.
- d. Managers who host these individuals, must insure they comply with the verification process with HR, or ensure the visitors/contractors wear face masks, and complete and clear the daily health questionnaire with HR.

C. Isolation, Quarantine and Testing

NEC will follow the Center for Disease Control (CDC) guidance for quarantine, isolation and testing as will be communicated to employees as they change.

D. Member Access to Services and Lobbies

Member face coverings and social distancing signage shall continue to reflect that such protections are recommended, though not required.

III. RESPONSIBILITY

The Chief Executive Officer shall be responsible for administration of this policy and, as such, shall issue such procedural regulations as may be required to effectively administer this policy. This policy supersedes all previously established emergency pandemic policies.

All employees and supervisors have the responsibility to follow the procedural and reporting requirements within this policy to protect themselves and others from this virus. Failure to follow the procedures or provide false information regarding the provisions of this policy shall result in disciplinary action, up to and including, immediate termination.

Current NEC Guidance Regarding the COVID-19 Pandemic

NEC's Emergency Pandemic Plan has been activated

(Updated 4/21/20)

This document is meant to update all personnel on the status of NEC during this pandemic. We recognize these are trying times for all of our valued employees at NEC. It is management's goal do everything possible to help you stay safe and healthy through the COVID-19 Pandemic while we continue to support our mission to our members. Please follow the guidance below.

- I. **Employees are encouraged to take responsibility for theirs and others health and safety through the following actions:**
 6. Wash your hands frequently and/or use hand sanitizers before and after touching public surfaces
 7. Avoid touching your face
 8. Clean surfaces in your workspace (desk areas and vehicles) and at home that you and others touch frequently
 9. Frequently wipe down doorknobs, handles, lobby and other public surfaces during business hours and when at home
 10. Take seriously the practice of social distancing of at least 6 feet, avoiding large crowds, and travel to hot spots - other areas of the country experiencing the spread of this virus.
 11. When in public, face coverings are encouraged; when meeting with one of more employees or members of the public while at work, face coverings are required.
- II. **Current NEC Restrictions & Guidance**
 17. Any planned travel to attend conferences or trainings or other meetings between now and the end of April is cancelled. We recognize these trainings are valuable and will seek opportunities in the future to reschedule or obtain online conference information. Business critical meetings will be addressed on a case by case basis. Many upcoming training and events are being postponed or moved to online. Cancellations to date include:
 - a. NEC meetings, in person, are limited to 10 participants who must be seated no closer than 6 ft.
 - b. TEC & NRECA Schools and Conferences have been cancelled through the end of April and many through the end of May.
 - c. The NEC Board meeting will be via video conference this month.
 - d. The TEC training are postponed or being delivered online at a later date
 - e. The Lineman Appreciation Day and Office staff appreciation luncheons and activities will be postponed but gifts will be distributed on desks.
 18. Only business-critical visitors may be admitted beyond the lobbies of our facilities and they must follow social distancing guidance. Those to be admitted into facilities for business reasons should be requested to complete the visitor questionnaire and if any answers are yes, should be denied admission. Forms completed and question should be directed to human resources.
 19. Line crews have been assigned individual vehicles to support social distancing and have cleaning supplies to keep tools and vehicles clean. Construction activities are limited or suspended.
 20. Line crews are adjusting work scheduling to limit exposure to each other.

21. NEC has increased the cleaning of offices. Cleaning crews are cleaning the Calallen and Retail Corpus offices daily, Ben Bolt three times per week, and Ricardo 3 times per week. Deep cleans will be ordered if there are concerns of possible exposure. Also, additional cleaning supplies and hand sanitizers are available.

22. Situation guidance...

Situation	Who to Contact	Actions Which Will/May Be Taken
You are sick	Contact your supervisor	Do not report to work
You've experienced loss of taste or smell, or cold or flu-like symptoms in the last 14 days (e.g. fever, fatigue, cough, sneezing, aches & pains, runny or stuffy nose, sore throat, respiratory illness, difficulty breathing)	Contact your supervisor	Stay home, call the health department to report your symptoms, follow their direction, communicate with your supervisor.
You've tested positive for COVID-19	Contact your supervisor or HR	You will be required to self-quarantine until you've been released to work by the health department/healthcare provider
You believe you've had contact with someone who has tested positive for COVID-19	Contact your supervisor	Do not report to work (14-day quarantine, or telework, if possible, may be required by NEC or health department)
You have traveled to an area with COVID-19 spread, or outside the Coastal Bend Counties of Nueces, Kleberg, Kenedy, McMullen, Brooks, San Patricio, Aransas, Live Oak, Duval and Jim Wells, or traveled outside a government order restricting travel	Contact your supervisor	Do not report to work; requires management review/investigation, case by case- 14-day quarantine, telework, or at work face coverings may be required by NEC; case review for possible disciplinary action if you violated company guidance or federal, state, or county order
You have had close contact with someone else who may have come into contact with someone who tested positive for COVID 19	Contact your supervisor	Do not report to work; requires management review/investigation, case by case- 14-day quarantine, telework, or at work face coverings may be required by NEC
You've had close contact with (<6 ft) or cared for someone diagnosed with COVID-19 within the last 14 days	Contact your supervisor	Do not report to work; You will be required to self-quarantine, teleworking if possible, for 14 days following last contact
You've returned within the last 14 days from a restricted area under a Level 2, 3, or 4 Travel Advisory according to the U.S. State Department or under a local, state or federal order.	Contact your supervisor	Do not report to work; You will be required to self-quarantine, teleworking if possible, for 14 days; case review for possible disciplinary action if you violated company guidance or federal, state, or county order
You've been in close contact (<6 ft) with anyone who has traveled within the last 14 days to a restricted area (see above)	Contact your supervisor	Do not report to work; requires management review/investigation, case by case- 14-day quarantine, telework, or at work face coverings may be required by NEC

23. As indicated above, if you are sick with the flu-like symptoms of COVID-19, these are the actions to take:

- a. Stay home from work and isolate yourself.
- b. In Nueces County, call the Health Department Hotline at 361.826.7200 they will give you guidance and, if warranted, an appointment for a drive through COVID-19 test at the old Memorial Hospital parking lot (available beginning Thursday, 3/19/20).

- c. In other counties, contact your healthcare provider – call first so they can make arrangements for office infection control and provide additional direction.
- 24. Local and federal ordinances limit NEC employee and public events to groups of 10 or less. Even in such groups, employees must social distance themselves by at least 6 feet. This means no handshakes, as well.
- 25. Meetings should be held via telephone conference calls or electronic means (email, Teams, video conferencing, etc.). To protect employees from possible exposure, no face-to-face meetings should be held. Meetings among employees in the same department may be held, but provisions to ensure social distancing of at least 6 feet apart must be met.
- 26. Our service and field personnel must also employ “social distancing” (of at least 6 feet) in dealing with the public. If individuals continue to approach you after you share you cannot be closer than 6 feet because of the pandemic, employees should get in their vehicle immediately and leave the property. Explain that they will be contacted by phone to regarding further arrangements. Notify dispatch of the issue.
- 27. Effective 3/30/20, new leave will not be approved for travel outside the Coastal Bend Counties of Nueces, Kleberg, Kenedy, McMullen, Brooks, San Patricio, Aransas, Live Oak, Duval and Jim Wells, or that violates a government order restricting travel. Vacation time already scheduled and approved should be reviewed with your supervisor. Questions should be directed to HR.
- 28. NEC lobbies are closed to members and the public (effective 5 pm, 3/20/20). Members are encouraged to pay bills, start service, and conduct all other necessary business through our free SmarHub app, NEC CE’s online portal, our website, by phone, the night deposit, or the drive-through. We’ll ask that anyone who can do business by phone to please do so in order to keep drive-thru times down.
- 29. NEC has NOT suspended member disconnections at this time, but we will give extra consideration to hardship situations for member bill payment. Members who have a history of DNPs may be disconnected.
- 30. NEC is utilizing telework for some employees who can work from home. This is offered in an effort to support social distancing, business continuity and to support parents of children for whom schools or daycares have been closed.
- 31. To limit the spread and protect employees, NEC has decided to close the workout room at HQ and to remove chairs in the breakrooms. All NEC breakroom and common areas will be off-limits to employees for any social gatherings such as breaks, lunches, and any social activities. These areas are particularly vulnerable to spreading germs. You will continue to have access to the refrigerator, coffee maker, water dispensers, etc. but we do ask that you continue to practice social distancing in all areas. Employees are still encouraged to get outside and take breaks and walks. Employees are also allowed to eat at their desks during this emergency.

Nueces Electric Cooperative Breakroom Guidelines During COVID-19

Revised 8/12/2020

Due to the serious nature of the COVID-19 pandemic, our NEC breakroom facility has been closed. Effective August 13, our breakrooms will once again be open and available to employees for lunches and breaks. NEC understands that the breakroom is a very important piece of our organization and just how valuable it is to all employees. In reopening the breakrooms, we ask that you read the guidelines below to better understand the rules and how this may affect you.

- 1) **NEW!** The breakroom can be a safe place as long as we all are continuing to practice State and CDC recommendations as best as we can along with the required guidelines NEC has put into place to support and protect the health of every employee.
 - The tables and chairs should always remain in the designated areas.
 - Only one employee per table.
 - Employees shall ensure that social distancing is maintained, facial coverings are worn when not eating, and proper respiratory and hygienic practices are kept.
 - Employees should adhere to all mandatory and required guidelines.
- 2) **NEW!** Below are some main practices that NEC currently has in place that supports our mission in helping to keep our employees safe.
 - NEC will regularly and frequently clean and disinfect any regularly touched surfaces in the breakroom, such as doorknobs, tables, chairs, counters, appliances, and floors.
 - NEC has placed readily visible signage in the breakroom to remind everyone of best hygiene practices.
 - NEC will provide cleaning products in the breakroom for use on any touched surfaces.
 - Disinfectant, hand sanitizer, soap and water are available for all employees practice safe hygiene.

NEC's number one priority is the health and safety of all our employees while at work and the safety of the public. The goal of this process is to discourage a person who is potentially ill or who has been exposed to COVID-19 from bringing this virus into the workplace and exposing others.

We appreciate your cooperation and thank you for helping us keep you and your teammates safe.

If you have any questions or issues, please contact the Human Resources Department as soon as possible.

Thank you.

Nueces Electric Cooperative

Nueces Electric Cooperative Hiring Process for New Employees During COVID-19

Revised 6/3/2020

- 1) The Conditional Job Offer & Standard Post-Offer Requirements
 - An emailed letter is provided to the candidate to confirm a conditional offer.
 - Candidates are required to confirm their acceptance or denial of the offer within three days from the date of the letter.
 - The offer is conditional and contingent on the potential employee passing NEC's pre-employment physical and background checks (Multi State Alias, 7 yr. criminal background, employment verification-3 employers, MVR, and Credit check).
 - A candidate will undergo NEC's pre-employment background checks, first, and if the candidate clears the background check process, the candidate will be required to pass a physical.
 - The physical will be arranged and paid for by NEC.
 - NEC will contact candidates who successfully complete the background and physical screening requirements to negotiate a start date.
- 2) **NEW!** Currently, NEC requires an additional post-offer step before a selected candidate may join our workforce - COVID-19 testing.
 - A certified negative test is required before a selected candidate is allowed on-site to work and the test must be performed as close to the start date as possible.
 - If the candidate is relocating to the area, preferably, the COVID-19 testing should be done in the Corpus Christi/South Texas area, after the candidate has relocated. Selected candidates should consult with HR on the timing for this process.
 - Testing should be arranged for and paid by the candidate with the expectation that NEC will provide reimbursement. Receipt and certification of the results should be provided to the HR department for reimbursement and review.
 - If there is an initial positive test result, we will postpone the start date until the candidate is cleared by the medical provider to start work. Following an initial positive test, if after three weeks, the employee is unable to obtain documentation and proof of a negative test result, the cooperative may rescind the job offer.
- 3) **NEW!** Selected candidates, who have not yet started, will also be provided NEC's current COVID-19 guidelines/policy via email once the start date has been confirmed. Candidates preparing to join our workforce should follow all requirements in the same manner that current active NEC employees do. All NEC employees follow these policy guidelines to reduce the potential for exposure in the workplace.
- 4) **NEW!** NEC follows the federal and state guidance to perform daily COVID-19 screenings. NEC conducts a Health & Travel Screening Survey of all current and new employees, along with visitors. Everyone is required to take this survey every day before you enter NEC facilities.
 - Once the selected candidate has fulfilled all of NEC's post-offer requirements above, they shall complete the daily survey screening on the first day of hire before arriving at any NEC facility. HR will prove new employees with the access information and instructions for the survey.

NEC's number one priority is the health and safety of all our employees while at work and the safety of the public. The goal of this process is to discourage a person who is potentially ill or who has been exposed to COVID-19 from

bringing this virus into the workplace and exposing others. We appreciate your cooperation and thank you for helping us keep you and your teammates safe. If you have any questions or issues, please contact Joanna Prado at 361.767.7338 as soon as possible. Thank you.

Nueces Electric Cooperative Gym Guidelines During COVID-19

Revised 6/15/2020

- 2) NEC gym facility has been closed due to the serious nature of the COVID-19 pandemic.
- 3) **NEW!** The NEC gym will be available for use effective June 15, 2020, to a limited extent. The gym can be a safe place to work out as long as we all are continuing to practice CDC's recommendations along with the mandatory guidelines NEC has put into place to support and protect the health of every employee. Below are some main practices we ask you to be mindful of:
 - NEC will daily clean and disinfect any regularly touched surfaces in the gym, such as doorknobs, equipment, and restrooms. Additional cleaning will be done by the users of facility equipment.
 - NEC will provide equipment cleaning products in the gym for use on equipment.
 - Cleaning products are not to be removed from the gym.
 - NEC locker rooms and shower facilities will remain closed for use, but restrooms will be open.
 - Employees are required to wash or sanitize their hands upon entering the gym or exercise facility.
 - NEC will place readily visible signage in the gym to remind everyone of best hygiene practices.
- 4) **NEW!** All NEC employees choosing to utilize the gym are required to follow the rules below.
 - Interested participants must sign up with LaRae Martin to use the gym. Following her initial set up, appointments must be reserved/scheduled at setmore.com or on the Set More app.
 - No more than two employees can use or be in the gym at a time.
 - The gym is available for a 45-minute reservation period. This period includes an allowance for employees to clean/sanitize all surfaces that they touched during the period.
 - Employee is required to self-screen before going into the gym for any new or worsening signs or symptoms of possible COVID-19 by completing and submitting a survey prior to entering the gym.
 - Employee will be required to wash or disinfect hands before entering the gym.
 - Employee is to disinfect any equipment before and after use, including exercise machines and weight equipment. Employee must follow mandatory and required guidelines of disinfecting/sanitizing equipment.
 - Employees are not allowed to bring his/her own equipment into the gym.
 - Any employee who is found to defy or disregard the outlined guidelines will no longer be allowed to use the gym facility until further notice.

NEC's number one priority is the health and safety of all our employees while at work and the safety of the public. The goal of this process is to discourage a person who is potentially ill or who has been exposed to COVID-19 from bringing this virus into the workplace gym and exposing others. We appreciate your cooperation and thank you for helping us keep you and your teammates safe.

If you have any questions or issues, please contact Joanna Prado by email or by telephone at 361.767.7338 as soon as possible. Thank you.

Emergency Operations Plan

Wildfire Annex

Over the past decade, the U.S. has witnessed a steady increase in wildfire activity. Experts predict this trend will remain. Despite the \$2 to \$3 billion per year to support wildland fire suppression efforts, the number of homes lost in wildfires per year has increased by 163 percent and wildfires now cost the U.S. an estimated \$63 to \$285 billion per year in losses. NEC and NEC Co-op Energy want to do all they can to protect our member's communities from these dangerous and destructive fires.

NEC plans and prepares year-round for periods when there is extreme risk for wildfires.

- NEC has a year-round hazard communication program to report and repair any hardware on the system that may contribute to wildfires
- NEC installs fuses and reclosers to minimize sparking and help identify and isolate line faults and uses *technology also designed to detect fire*. We are currently utilizing FCI (Faulted circuit indicators) to remotely communicate all detections of the presence of a fault on the line including those that momentary in nature. Such indication of momentary "blinks" assist crews in locating arcing conditions that may result in a fire.
- NEC has a pole inspection program in which weakened poles are tagged and replaced
- *NEC manually inspects a de-energized line before closing the circuit*. Before a circuit or a line section is to be energized, such circuit or line section will be inspected to ensure all personnel and equipment including protective grounds are clear and such sections are free of potential hazards. Upon communicating the completion of their inspection of the circuit or line section, the dispatcher may proceed to give the field crews authorization to energize the circuit.
- NEC has a year-round vegetation management program to clear brush within the distribution system right-of-way
- NEC has continual weather monitoring to receive alerts and notices of elevated wildfire dangers from the National Weather Service. When these warnings are issued...
 - *NEC avoids working on energized lines, taking clearances to make any repairs wherever possible*
 - *NEC employees avoid driving into high brush areas*

How we'll send wildfire alerts to co-op system operators

Following notification and upon confirmation of a wildfire within NEC's service territory, the Dispatcher on Duty would immediately notify the Line Superintendent, who will further notify the CCO and CEO of the same.

In the event of a wildfire emergency, NEC will also work and cooperate with the appropriate authorities in the following manner:

- Consult and communicate with the appropriate authorities (Fire Departments, Law Enforcement Agencies and Departments, State and Federal Range Management entities, individual land owners) as to how the Cooperative can assist in the extinguishing of any wildfires within the Cooperative's service territory. This communication would be between the appropriate

authorities and the Cooperative's management and field personnel via person-to-person communication, telephone/texting, email and common frequency 2-way radio communication (if possible).

- Have Cooperative personnel available to de-energize power lines, sectionalize power lines, re-route feeds or any other actions which would help ensure the safety of the fire fighters, other emergency personnel, Cooperative personnel and property, and individuals and their property.
- Promote and participate in wildfire prevention and safety programs.
- Cooperate with and assist the wildfire emergency authorities to any reasonable extent possible during the duration of a wildfire emergency.

NEC Emergency Operations Plan

NEC & NEC Co-op Energy Cyber Security

Annex- Incident Response Policy

1. Purpose & Scope

This document outlines the plan for responding to information security incidents affecting Nueces Electric Cooperative (NEC), including defining the roles and responsibilities of participants, the overall characterization of incident response, relationships to other policies and procedures and guidelines for reporting requirements.

Due to the wide variety of incidents that could face the organization and the rapid advancement of threats against data and systems, this document is designed to provide guidance in reacting to data security incidents, determination of their scope and risk, and ensuring an appropriate response to information security incidents, including communication of incidents to the appropriate stakeholders, and reducing the incident from re-occurring.

In the event of an actual incident, modifications to this document, or deviations from the plan, may be required to ensure the protection of people, systems, and data.

The objectives of the Plan are to:	
✓	Establish a Response Team, assign individuals to fill team positions, and define the roles and responsibilities of team members.
✓	Define notification, activation, and mobilization procedures to be followed when an incident occurs.
✓	Define organizational lines of responsibility to be adhered to during a response operation.
✓	Ensure compliance with Federal, State, and local cybersecurity regulations.

The purpose of the Cyber Incident Response Team is to:	
✓	Isolate resources impacted by the event.
✓	Notify necessary parties within documented timeframes.
✓	Protect NEC's information assets.
✓	Limit incident impacts to the organization, business processes, customers, and partners.
✓	Comply with regulatory requirements.
✓	Prevent the use of NEC's systems in attacks against other systems.

This plan applies to all information systems, networks, organizational and client data, as well as any person or device accessing these systems or data.

Anyone suspecting an exposure of NEC data or systems should immediately contact the help desk and security team:

Help Desk – it-help@nueceselectric.org
NEC Security Team – it@nueceselectric.org

Contact in case of escalation:

- San Antonio FBI Field Office – 5740 University Heights Blvd, San Antonio, TX 78249 – (210) 225-6741
- CISA Region 6 Office – Irving, TX – 888-282-0870
- Texas Attorney General’s Office – 300 W. 15th Street, Austin, TX 78701 – (512) 463-2100

2. Regulatory Obligations and Guidance

The IT Director acts on behalf of NEC and will request cooperation and assistance in investigating incidents from community members as required. The IT Director will also work closely with other NEC administrative groups such as Legal, Human Resources, Information Technology, or other department heads in the investigation of incidents, as necessary.

This plan is written using industry best practices and government regulations to document a plan for Detection, Analysis, Containment, Eradication, Recovery, and Post-Incident Activities.

Resources include, but are not limited to:	
✓	NIST SP 800-171r2 – Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations.
✓	NIST SP 800-61r2 – Computer Security Incident Handling Guide
✓	NIST SP 800-184 – Guide for Cybersecurity Event Recovery
✓	NIST SP 800-83r1 – Guide to Malware Incident Prevention and Handling for Desktops and Laptops
✓	NIST Cybersecurity Framework (CSF)
✓	SANS Incident Handlers Handbook
✓	Cyber Resilience Review (CRR) Incident Management Supplemental Resource Guide

3. Responsibility, Review, and Testing

Responsibility for the development and maintenance of this plan is assumed by the IT Director in coordination with the Compliance Department. The plan shall be reviewed and tested at least

annually. Changes resulting from the annual review and/or testing should be documented and distributed accordingly. In the event of a revision requirement before annual review, changes will be made promptly.

4. Incident Response Methodology

The primary goal of the NEC Incident Response Program is to mitigate security incidents and limit impacts should an incident occur. Good controls and security standards, along with robust monitoring, logging, and analysis are the best line of defense against cybersecurity threats. Should a suspicious event be identified, the IT Director is responsible for assessing the event to determine if it meets the definition of a cybersecurity incident. According to NIST SP 800-61, an *event* is any observable occurrence in a system or network (e.g., a user connecting to a file share, a server receiving a request from a webpage, a user email, a firewall blocking a connection attempt) and a *security incident* is a violation of, or imminent threat of violation, of computer security policies, acceptable use policies, or standard security practices. Examples of incidents are:

- An attacker sends high volumes of connection requests to a web server, causing a denial of service.
- Users are deceived into opening an email link that contains malware.
- A threat actor obtains access to corporate assets (hardware or sensitive data) and threatens to cause damage (shutdown devices, encrypt data, or release information publicly) unless paid a ransom.
- A user provides or exposes sensitive information to others through filesharing services.

Incidents can occur in many ways, so it isn't feasible to document step-by-step instructions for handling every incident. Below are several types on incidents based on common attack vectors to aide in general classifications and response procedures.

- External/Removable Media – attack executed from a flash drive, CD, or other peripheral device.
- Attrition – Attacks that employ brute force methods to compromise, degrade, or destroy systems, networks, or services.
- Web – An attack executed from a website or web-based application.
- Email – An attached executed via an email message or attachment.
- Improper Usage/ Insider Threat – Any incident resulting from violation of the Acceptable Use Policy by an authorized user, excluding the above categories.
- Loss or Theft of Equipment – The loss of theft of a computing device with access to the organization or corporate network (e.g., laptop, smartphone)
- Other – An attack that doesn't fit any of the other categories.

Once an incident is identified it should be classified and prioritized. The severity levels below are based on the impact to NEC and can be expressed in terms of financial impact, impact to services and/or performance of mission functions, impact to NEC's image or impact to trust by NEC's customers. The table below provides a listing of the severity levels and a description of each severity level.

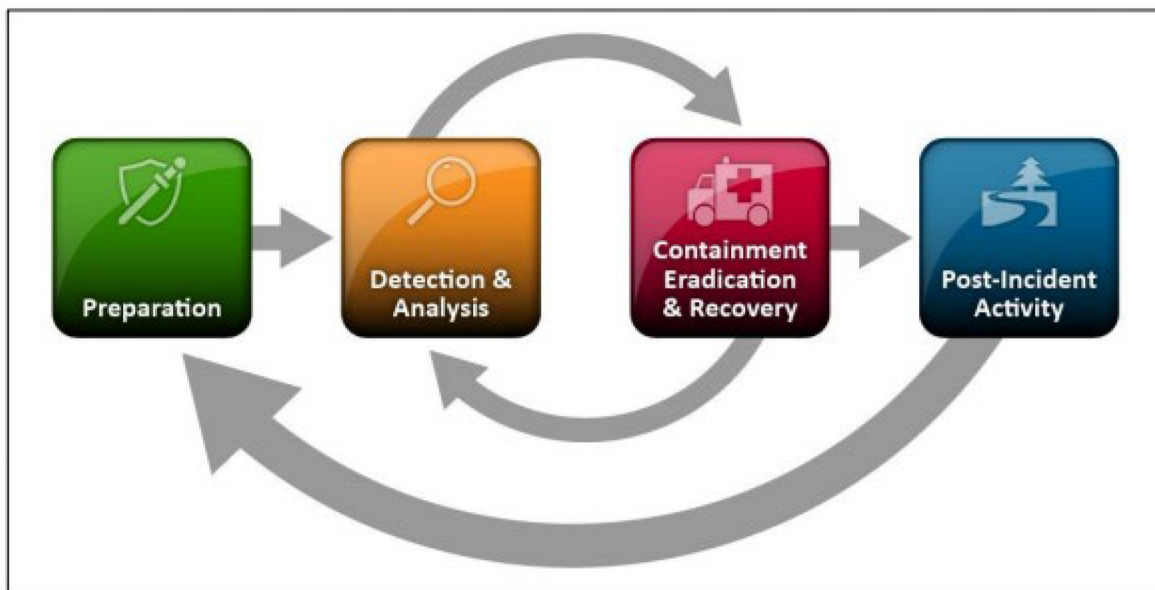
Severity Level	Description
Baseline – Level 0	<ul style="list-style-type: none"> -Unsubstantiated or inconsequential event. -Security team can research and identify no impact to systems or processes. -Internal notification only.
Low – Level 1	<ul style="list-style-type: none"> -Incident where the impact is minimal. -Limited to NO impact to critical business operations, easily isolated and resolved. Redundancy or workarounds are used to maintain business processes. - Internal notification only.
Medium – Level 2	<ul style="list-style-type: none"> -Incident where the impact <i>could</i> be significant. -Delayed or impaired ability to provide services, meet NEC’s mission, or provide general business functions, but redundancy or workarounds can be used to restore full functionality quickly. - Internal and regulatory notification required.
High – Level 3	<ul style="list-style-type: none"> -Incident where the impacts are severe. -Likely disruption to operations. NEC proprietary or confidential information has been compromised, malware has become widespread and is affecting multiple employees, or monitoring and/or information systems are unavailable or degraded. - Internal and regulatory notification required.
Critical – Level 4	<ul style="list-style-type: none"> -Incident where the impact is catastrophic. -A complete severance of NEC network services, inoperable equipment and/or facilities. NEC proprietary or confidential information has been compromised and published on a public site. - Internal, regulatory, and (likely) public notification required.

5. Responding to an Incident

There are six stages of incident response and in many cases, stages will overlap to ensure timely and thorough response:

1. Preparation—one of the most important aspects of a response plan is to know how to use it once it is in place. Knowing how to respond to an incident BEFORE it occurs can save valuable time and effort in the long run.
2. Detection and Analysis—identify if an incident has occurred. If one has occurred, the response team can take the appropriate actions. Identification is provided through alerts from monitoring tools such as endpoint protection, IDS, scanning, or a user report.
3. Containment—involves limiting the scope and magnitude of an incident. Because so many incidents observed currently involve malicious code, incidents can spread rapidly. This can cause massive destruction and loss of information. As soon as an incident is recognized, immediately begin working on containment. Automated tools such as endpoint protection in many cases may automatically contain the risk. When this is not the case, affected devices will be removed the network (quarantined) to stop potential spread.

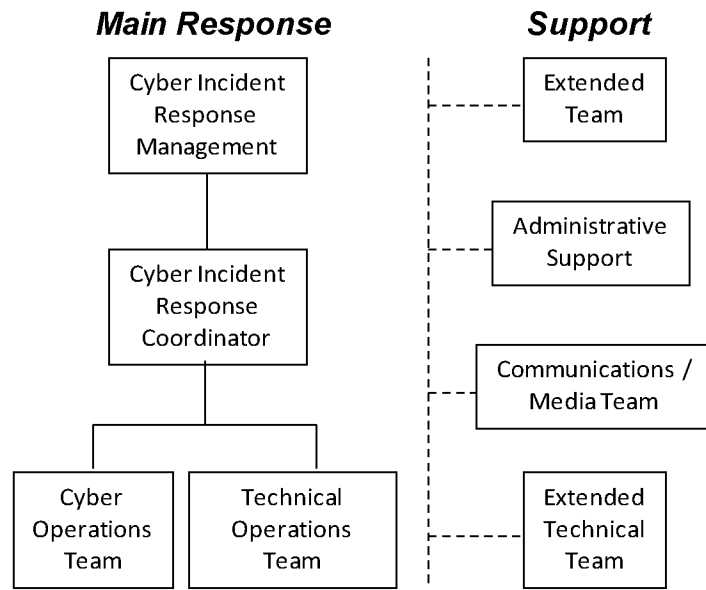
4. Eradication—removing the cause of the incident can be a difficult process. It can involve virus removal, conviction of perpetrators, or dismissing employees.
5. Recovery—restoring a system to its normal business status is essential. Once a restore has been performed, it is also important to verify that the restore operation was successful and that the system is back to its normal condition. This involves testing the devices to ensure it is properly configured, functions as expected, and produces clean scans.
6. Follow-up—some incidents require considerable time and effort. Often once the incident appears to be terminated there is little interest in devoting any more effort to the incident. Performing follow-up activity is, however, one of the most critical activities in the response procedure. This follow-up can support any efforts to prosecute those who have broken the law. Proper follow-up can also identify any areas for improvement in incident response procedures.



Incident Response Life Cycle

5.1 Organization

To adequately respond to an intrusion or incident, predetermined teams will participate depending on the incident characteristics. As the situation develops and the impact of the incident increases, the various teams delineated in this policy will be called upon to execute their designated roles and responsibilities. The matrix below depicts those teams at a broad level, including the relationship(s) between them.



Role	Responsibilities	Primary/Alternate(s)
Cyber Incident Response Management	Will have overall responsibility for directing activities in regard to the incident at High Severity Level and above. Will serve in advisory capacity for incidents at Medium Severity Level.	IT Director
Cyber Incident Response Coordinator	Provides oversight to incident response. Requests resources as required to effectively contain and manage an incident response. Documents incident for purposes of law enforcement, lessons learned, and insurance.	IT Director
Cyber Operations Team / Technical Operations Team	Provide technical aspects of incident response.	IT Team Members
Communications / Media Team	Responsible for internal, external and media communications	Chief Compliance Officer
Extended Technical Team	Provides additional technical skill and capability to the Technical Operations team as required (i.e., outside vendor or agency)	Internal/External Security Consultants
Extended Team	Provide additional visibility and support to incident response as required. Provide specific HR, legal, finance, etc. skills as required.	General Counsel, External Counsel, Insurance provider, HR (if insider incident)

5.2 Escalation Levels

Severity Level	Main Response			Support		
	Technical Ops Team, Cyber Ops Team	Cyber Incident Response Coordinator	Cyber Incident Response Mgmt.	Comms/ Media Team	Extended Technical Team	Extended Team
Low – 1	X	X	X			
Medium - 2	X	X	X			
High – 3	X	X	X	X	X	
Critical - 4	X	X	X	X	X	X

The escalation process will be invoked to involve appropriate resources as the incident's impact on the confidentiality, integrity and/or availability of NEC data increases. Incidents should be handled at the lowest escalation level capable of responding to the incident with as few resources as possible to reduce the total impact, and to maintain control of the incident. The table below defines the escalation levels with the associated team involvement.

Escalation Level	Affected Team(s)	Description
Low - 1	<ul style="list-style-type: none"> Technical Operations Team Cyber Operations Team Cyber Incident Response Coordinator Cyber Incident Response Management 	Normal Operations. Engineering and cyber groups monitoring for alerts from various sources.
Medium - 2	<ul style="list-style-type: none"> Technical Operations Team Cyber Operations Team Cyber Incident Response Coordinator Cyber Incident Response Management 	NEC has become aware of a potential or actual threat. Determine defensive action to take. Message employees of required actions if necessary.
High - 3	<ul style="list-style-type: none"> Cyber Incident Response Management Cyber Incident Response Coordinator Technical Operations Team Cyber Operations Team Extended Technical Team Communications / Media Team 	A threat has manifested itself. Determine course of action for containment and eradication. Message employees of required actions if necessary.
Critical - 4	<ul style="list-style-type: none"> Cyber Incident Response Management Cyber Incident Response Coordinator Extended Team 	Threat is widespread or impact is significant. Determine course of action for containment, mitigation, and eradication. Message employees. Prepare to take legal action. Prepare to make public statement.

Escalation Level	Affected Team(s)	Description
	<ul style="list-style-type: none">• Technical Operations Team• Cyber Operations Team• Extended Technical Team• Communications / Media Team	

5.3 Escalation Considerations

Cyber Incident Response Management will consider several characteristics of the incident before escalating the response to a higher level. They are:

- How widespread is the incident?
- What is the impact to business operations?
- How difficult is it to contain the incident?
- How fast is the incident propagating?
- What is the estimated financial impact to NEC?
- Will this affect NEC's image negatively?

The IT Director represents all NEC provided Information System(s) and Organizational Data including data residing in cloud-based services. To the extent possible during an investigation, the IT Director will attempt to coordinate investigation efforts with other groups in ensuring the security of NEC systems and data in relation to the activities in support of the organization. Specific actions and resources utilized in the investigation of an incident will be in alignment with the type, scope, and risk of the threat to systems and data.

The primary goals of incident response are to contain the scope of an incident and reduce the risk to systems and data and to return affected systems and data back to an operational state as quickly as possible. The ability to quickly return systems to operation may at times be hampered by the collection of data necessary as evidence in the event of an exposure of data.

In today's technology-centered world many individuals have expectations about the availability of systems and data for themselves and the clients they serve. The interruption of services can cause a hardship and the IT Director will cooperate with the affected groups to ensure downtime is minimized. However, NEC leadership supports the priority of investigation activities where there is significant risk, and this may result in temporary outages or interruptions.

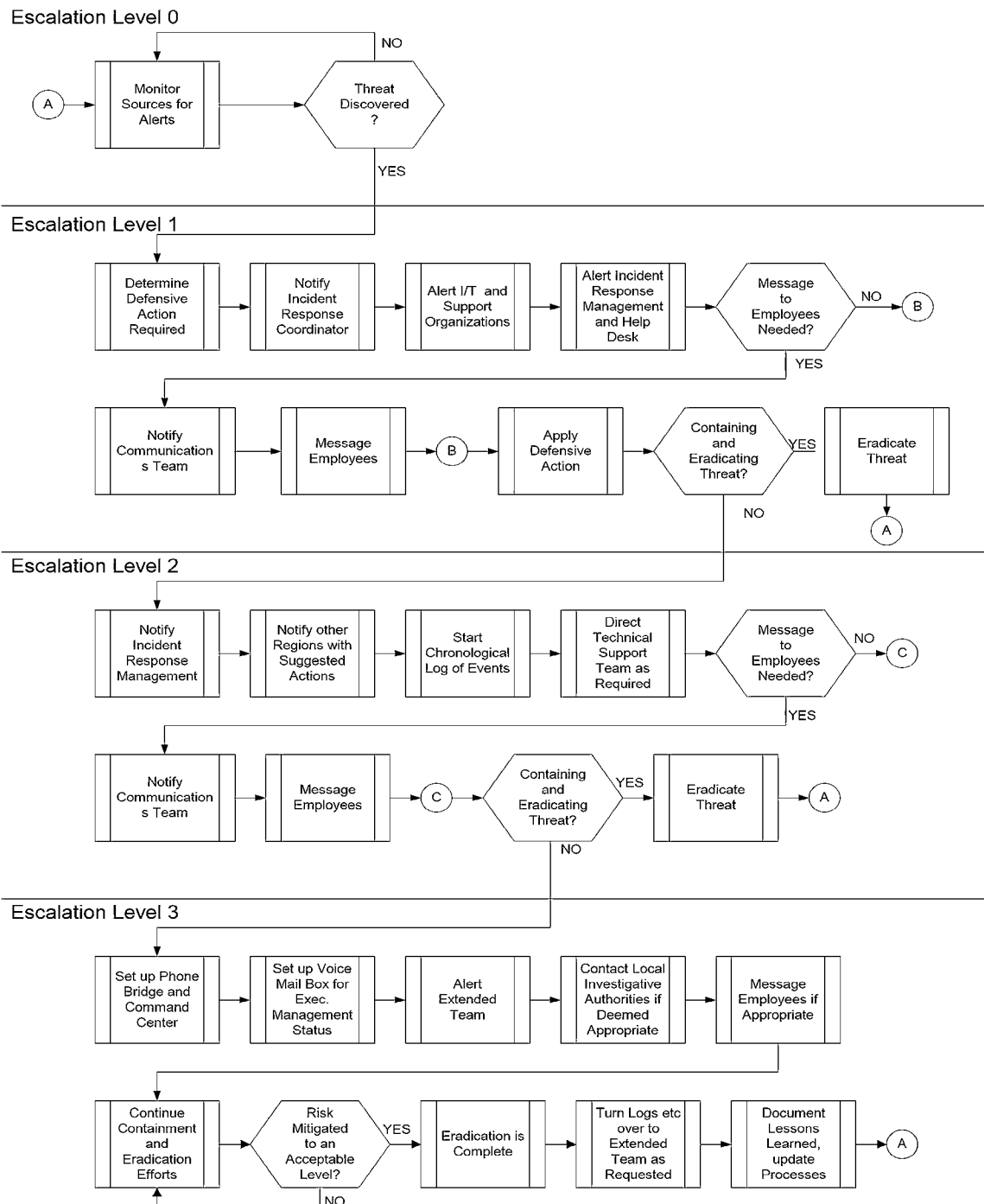
5.4 Training

The continuous improvement of incident handling processes implies that those processes are periodically reviewed, exercised, and evaluated for process improvement. NEC staff who have incident response responsibilities will be periodically trained on procedures for reporting and handling incidents to ensure there is familiarity with the process and with the responsibilities of the

Incident Response Team. These exercises may take the form of either external or internal training including tabletop exercises.

6. Cyber Incident Response Process

The Cyber Incident Response Process is an escalation process allowing for escalation as the scope of the incident threat expands. At each escalation level, team members who will be engaged at the next higher level of escalation are alerted to the incident so that they will be ready to respond should they be needed.



6.1 Cyber Incident Response Team Roles and Responsibilities

6.1.1 Escalation Level 1 – Low Severity

- a. Technical Operations Team / Cyber Operations Team
 - 1. Monitor all known sources (e.g., IPS, endpoint protection, vulnerability scanning) for alerts or notification of a threat.
 - 2. Take appropriate defensive actions per known issues.
 - 3. Escalate to Cyber Incident Coordinator so they can prepare for an escalation to next severity level.
- b. Cyber Incident Coordinator
 - 1. Stay aware of the incident investigation.
 - 2. Prepare for escalation to Level 2/Medium Severity.

6.1.2 Escalation Level 2 – Medium Severity

NEC has become aware of a potential or actual threat.

- a. Technical Operations Team / Cyber Operations Team
 - 1. Determine initial defensive action required.
 - 2. Engage the Cyber Incident Coordinator.
 - 3. Determine appropriate course of action.
- b. Cyber Incident Coordinator
 - 1. Escalate Cyber Incident Response to Level 3/High Severity if a report is received indicating that the threat has manifested itself.
 - 2. Determine relevant membership of the Technical Operations and Extended Technical teams.
 - 3. Alert other IT personnel and applicable support organizations of the potential threat and any defensive action required.
 - 4. Alert Cyber Incident Response Management of the potential threat. Seek advisory inputs as appropriate.
 - 5. Alert Communications Team.
- c. Cyber Incident Response Management
 - 1. Provide advisory inputs as appropriate.
- d. Communications Team
 - 1. If employee action required, message employees of required action.

6.1.3 Escalation Level 3 & 4 – High and Critical Severity

The threat has become widespread or has become a critical severity level.

- a. Cyber Incident Response Management
 - 1. Direct the response team to:
 - a. Set up communications channels between all teams.
 - b. Assume occupancy of the command center if one exists.
 - c. Open a teleconference bridge for ongoing communications and team

interaction or initialize an incident voice mail box where status messages can be placed to keep NEC personnel updated.

2. Notify applicable local, state, and/or federal regulators. See Appendix A for notification requirements.
3. Organize scheduled team meetings. Define specific status update schedule.
4. Authorize initial communications to employees and executives.
5. Alert the Extended Team of the incident notifying them of the Severity Level.
6. Update Executive Management as appropriate.
7. Determine when the risk has been mitigated to an acceptable level.

b. Extended Team

1. Ensure that all needed information is being collected to meet regulatory reporting requirements.
2. Assist in forensic analysis where applicable.
3. Ensure that all needed information is being collected to support legal action or financial restitution.

c. Cyber Incident Response Coordinator

1. Continue maintaining the Chronological Log of Events.
2. Continue to manage incident response per direction of Cyber Incident Response Management.

d. Communication Team

1. Message NEC population and external media as directed by Cyber Incident Response Management.

e. Technical Operations Team

1. Continue to monitor all known sources (e.g., IPS, endpoint protection, vulnerability scanning) for alerts looking for further information or actions to take to eliminate the threat,
2. Continue reporting status to the Cyber Incident Response Coordinator for the chronological log of events,
3. Monitor effectiveness of actions taken and modify them as necessary,
4. Provide status to Cyber Incident Response Coordinator and Cyber Incident Response Management on effectiveness of actions taken and progress in eliminating the threat.

f. Extended Technical Team

1. Continue actions to eradicate the threat as directed by Cyber Incident Response Coordinator and Cyber Incident Response Management and the Technical Operations team.
2. Continue to report actions taken, number of personnel etc. to the Cyber Incident Response Coordinator for the chronological log.

6.2 Special Circumstances

Email Communications are Compromised or Otherwise Unavailable

There could be a cybersecurity incident that compromises the ability to communicate via email. In this case, backup communications will be conducted via desk phone or cell phone.

Confidential or Restricted Use Information is Leaked via Internal Source

The process defined above can also apply to the circumstance where information is leaked via an internal source by accident or maliciously. In this case, the steps in the response process would be very similar to the above process but would also include early determination of the type and quantity of data leaked, the source of the leak and the potential impact of the leak to the employees or to the public at large.

7. Required Incident Reporting

- Once it is determined that enough information about the situation and the extent of the exposure has been collected, the IT Director will collaborate with the Legal team to determine if the incident rises to the level of a security breach. If this is determined, appropriate members of the Executive Response Team should work together to determine what, if any, level of notification is required, how individuals impacted by the exposure should be notified and what, if any, services should be offered to the individuals impacted by the data exposure to help protect themselves from potential or actual identity theft. As part of this analysis, the Legal team will review applicable state and federal privacy, data security, and breach notification laws and a plan of action to comply with applicable requirements of such laws.
- Where required by state and or federal law, the IT Director will coordinate with the Legal team and NEC Communications to ensure that appropriate state and/or federal government entities (e.g., state attorneys general, other state agencies, FBI, DHS) are notified of the exposure, who has been impacted, and NEC's course of action related to managing the exposure of data.
- Where appropriate, the Executive Response Team will contact the Prime Contractor or Contracting officer for Government contracts, the Attorney General's Office and/or any other appropriate State and Federal Officials to inform them about the data exposure.
- Where necessary or appropriate, the ERT will expeditiously collaborate to develop press releases and letters to affected individuals (by email and/or U.S. post).
- The ERT will designate a single point of contact to address questions/concerns of individuals concerned about the exposure. NEC Communications will ensure that employees are made aware of the single point of contact to whom questions/concerns should be directed.
- In the course of managing and remediating the exposure, as expeditiously as possible:
 - The IT Director will work with required vendors to process any appropriate paperwork (i.e., SOW, PO, etc.) to engage the vendor's services.
 - The ERT will work with appropriate staff to draft notification letters, and where appropriate, FAQ's regarding the incident.
 - Notification letters will be sent to impacted individuals or organizations by First Class Mail, email and/or other methods required by law.
 - Where applicable, press releases will be finalized and issued by NEC Communications where appropriate. The main NEC website(s) will include a link to the news release.

- A mechanism for logging calls and/or inquiries received, as well as responses and/or assistance given, shall be created, and implemented.
- Once proper notifications have been sent and posted and the matter has been contained and handled, debriefing meeting(s) should be held with all individuals involved in the incident investigation, management, and remediation. Additional follow-up activities should occur as appropriate.

8. Post Incident

After the threat of the incident has been neutralized, the team must review the events and look for areas of learning and improvement. All phases of the incident response process should evolve to reflect new threats, improved technology, and lessons learned. Reports should be generated to share important information about the incident and its impact to the organization.

8.1 Cyber Incident Coordinator and Response Management

- Report on:
 - Estimate of damage/impact,
 - Action taken during the incident (not technical detail),
 - Follow on efforts needed to eliminate or mitigate the vulnerability,
 - Policies or procedures that require updating,
 - Efforts taken to minimize liabilities or negative exposure,
 - Provide the chronological log and any system audit logs requested by the Extended Team.
- Document lessons learned and modify the Cyber Incident Response Plan accordingly.

8.2 Extended Team

- Legal and Communications work with the local authorities as appropriate in the case that the incident was from an external source.
- HR will work with department leadership to determine disciplinary action in the case that the incident was from an internal source.
- DoD and CISA shall be leveraged to support as necessary or required.

9. Related Standards, Policies, and Processes

- Data Classification and Retention Policy

10. Revision History

Date of Change	Responsible	Summary of Change
3/18/2022	Sergey Seryogin	Initial Draft.

Appendix A – Guidelines for Incident Response

Each incident presents a unique set of challenges and problems. This section provides some common guidelines for preferred actions in these types of events. For any issues outside of these guidelines, the Chief Information Security Officer or Office of General Counsel should be consulted.

Incidents within Chain of Command

In incidents where a member of the incident response team, their leadership or the leadership of the organization is being investigated, appropriate resources will be selected to remove any conflicts of interest at the direction of or in conjunction with either Legal Counsel or the Board of Directors.

Interactions with Law Enforcement

All communications with external law enforcement agencies shall be made after consulting with Legal Counsel.

Communications Plans

All public communications about an incident or incident response to external parties outside of the Organization are made in consultation with the Legal Counsel and NEC Communications. Private communications with other affected or interested parties should contain the minimum information necessary as determined by the Incident Coordinator or IT Director.

Privacy

NEC respects the privacy of all individuals, and wherever possible the incident response process should be executed without knowledge of any individual identities until necessary.

Documentation, Tracking and Reporting

All incident response activities will be documented to include artifacts obtained during any investigation. As any incident could require proper documentation for law enforcement action, all actions should be documented, and data handled in an appropriate manner to provide a consistent chain of custody for the validity of the data gathered.

Escalation

At any time during the incident response process, the Incident Response Coordinator or IT Director may be called upon to escalate any issue regarding the process or incident.

The Facility Security Officer in consultation with Legal Counsel will determine if, and when, an incident should be escalated to external authorities.

When escalating an incident internally, e-mail will be the primary means of communication and include all stakeholders mentioned in the associated level of escalation. The e-mail communications will be used in tandem with the help desk ticket system to archive, track and document all formal communication related to the incident.

Points of Contact in Case of Escalation:

- San Antonio FBI Field Office – 5740 University Heights Blvd, San Antonio, TX 78249 – (210) 225-6741
- CISA Region 6 Office – Irving, TX – 888-282-0870
- Texas Attorney General's Office – 300 W. 15th Street, Austin, TX 78701 – (512) 463-2100

Appendix B. Cyber Incident Response Playbook Scenarios
Threat Type 1: Server Software Vulnerability

Escalation Level Low Severity

TECHNICAL OPERATIONS TEAM

1. A critical *zero-day* (discovered by its use in the wild) software vulnerability affects the operating system on a widely used production server. The vulnerability allows for an unauthorized privilege escalation and therefore unauthorized data access. The threat is escalated to Level 2/Medium Severity.

Escalation Level 2/Medium Severity

TECHNICAL OPERATIONS TEAM

1. Determines that the defensive action required is a patch of the operating system from the vendor.
2. Notifies the Incident Coordinator of the vulnerability.
3. Determines that employee action is not required.

INCIDENT COORDINATOR

1. Receives and tracks the status of the vulnerability.
2. Does not escalate the threat to Level High Severity since the vulnerability has not manifested itself.
3. Determines relevant membership of the Technical Operations and Extended Technical team.
4. Alerts IT organizations and applicable support organizations of the vulnerability. The action required to contain the threat is a patch of the operating system from the vendor. This patch must be applied and tested on a development server before being propagated to the production server.
5. Alerts Cyber Incident Response Management of the vulnerability.
6. Alerts the Communications Team.

COMMUNICATIONS TEAM

1. Since employee action is not required, no message to employees is necessary.

Post-Incident

CYBER INCIDENT RESPONSE MANAGEMENT

1. Prepares a report for NEC Executive Management to include:

- a. Estimate of the impact of addressing the vulnerability and the potential cost of not doing so,
 - b. Action taken during the vulnerability's assessment,
 - c. Follow on efforts needed to eliminate or mitigate the vulnerability,
 - d. Policies or procedures that may require updating (if applicable), and
 - e. Efforts taken to minimize the liabilities of negative exposure of the vulnerability.
2. Provides the chronological log and any system audit logs requested by the Extended Team.
3. Documents any lessons learned and modifies the Cyber Incident Response Plan accordingly.

EXTENDED TEAM

1. Not needed, because there was no manifestation of the vulnerability.

Threat Example 2: Ongoing Phishing Attack on Employees

Escalation Level Low Severity

TECHNICAL OPERATIONS TEAM

1. Emails have been circulating to NEC employees that link users to a fraudulent website designed specifically to gather user authentication credentials from NEC employees. The threat is escalated to Level 2/Medium Severity.

Escalation Level Medium Severity

TECHNICAL OPERATIONS TEAM

1. Determines that the initial defensive action required is to notify employees of the phishing scam and educate them on avoiding these types of attacks.
2. Notifies Incident Coordinator.
3. Determines that employee action will be required, notifies applicable service center (e.g. HR, department leads).

CYBER INCIDENT COORDINATOR

1. Receives and tracks the phishing attack.
2. Escalates the threat to Level 3/High Severity since it has manifested itself.
3. Determines relevant membership of the Technical Operations and Extended Technical Team.
4. Alerts IT organizations and applicable support organizations of the phishing. The organizations begin modifying internal firewalls to block the offending website as well as initiating a system-wide password reset.
5. Alerts Cyber Incident Response Management of the phishing threat.
6. Alerts the Communications Team.

COMMUNICATIONS TEAM

1. A message is composed to all employees and sent system wide. Additionally, all departmental managers are alerted to the phishing scam and asked to notify all employees in person immediately.

Escalation Level High Severity

CYBER INCIDENT COORDINATOR

1. Notifies Cyber Incident Response Management of the phishing attack.
2. Alerts the Cyber Incident Response Support Team of the phishing attack.
3. Alerts the Extended Team.

4. Receives status from the Technical Operations Team regarding the status of employee education. Reports the status to the Cyber Incident Response Management.
5. Starts a chronological log of the events, including logs of emails and, if possible, logs of users accessing the offending website.

TECHNICAL OPERATIONS TEAM

1. Determines that the best course of action for containing the attack is educating all employees about the attack and blocking any further emails from arriving on mail servers. Additionally, concludes that blocking the fraudulent website from being accessed internally. Finally, decides that a system-wide user password reset is necessary, since email is accessible from outside of NEC's network and merely blocking the offending site will not be sufficient and the emails have been circulating for an unknown amount of time to only select employees.
2. Notifies the Extended Technical Team of the above actions that are required.
3. Reports actions taken and status to the Cyber Incident Response Coordinator.

CYBER INCIDENT RESPONSE MANAGEMENT

1. Assumes responsibility for directing activities regarding the phishing attack.
2. Determines that the attack does not need to be escalated to Level 3.
3. Determines when the risk has been mitigated to an acceptable level.

EXTENDED TECHNICAL TEAM

1. Takes the actions required by the Technical Operations Team.
2. Reports the actions taken, the number of personnel involved etc. to Cyber Incident Coordinator for the chronological log.

COMMUNICATIONS TEAM

1. Carries out the education of NEC employees by informing them of the incident and making sure everyone is aware of the scam as deemed appropriate by Cyber Incident Response Management.
2. Messages the NEC employees about the system-wide password reset, and how the employees must go about regaining access to their user accounts as determined by the technical assessment team and directed by Cyber Incident Response Management.

Post Incident

CYBER INCIDENT RESPONSE MANAGEMENT

1. Prepare a report for NEC Executive Management to include:
 - a. Estimate of the impact of addressing the phishing attack and the potential cost of not doing so,

- b. Action taken during the attack's assessment,
 - c. Follow on efforts needed to eliminate or mitigate the vulnerability presented by the phishing attack,
 - d. Policies or procedures that may require updating, such as password change rules and procedures, and
 - e. Efforts taken to minimize the liabilities of negative exposure of the attack.
- 2. Provides the chronological log and any system audit logs requested by the Extended Team.
- 3. Documents any lessons learned and modifies the Cyber Incident Response Plan accordingly.

EXTENDED TEAM

- 1. Legal works with the authorities to present any information relating to the phishing party.
- 2. No disciplinary action will need to be taken.
- 3. Executive Management Team (EMT) leveraged to communicate to employees about the threat of phishing attacks and to be vigilant.

Threat Example 3: Malware or Ransomware

Escalation Level Low Severity

TECHNICAL OPERATIONS TEAM

1. A NEC employee reports performance and possibly other issues on their PC. After a quick check it is determined the PC has been infected with some form of malware. You do not yet know how long it has been there or if it has spread, so the incident is escalated to Level Medium Severity.

Escalation Level Medium Severity

TECHNICAL OPERATIONS TEAM

1. Notifies the Cyber Incident Coordinator.
2. Removes the infected system from the network, disables all wireless, Bluetooth, and any other potential network capabilities.
 - a. Verify all shared and networked drives are disconnected, whether wired or wireless.
 - b. Verify the device is fully segregated from all other computers or devices.
3. Segregate any other computers or devices that shared a network with the infected computer.
4. Preserve volatile memory by collecting forensic memory image of the affected device before powering it off or moving it.

CYBER INCIDENT COORDINATOR

1. Receives and tracks the malware event.
2. (While technical operations team is isolating the device) begin analysis to pinpoint the threat and determine if it has spread or provided a hacker with access to critical infrastructure.
3. Escalates to Level High Severity because data suggests the threat has manifested itself.
4. Determines relevant membership of the Technical Operations and Extended Technical teams.
5. Alert Cyber Incident Response Management of the event.
6. Alert the Communications team.

COMMUNICATIONS TEAM

1. Work closely with the Cyber Incident Coordinator and Manager to ensure regulatory reporting requirements are met and impacted internal resources are aware of their roles.

Escalation Level High Severity

CYBER INCIDENT COORDINATOR

1. Coordinates and delegates malware incident handler tasks, ensuring technical operations team has the tools (hardware and software) required for malware analysis and neutralization.
2. Alerts the Extended Team, including resources who may be brought in to help with forensic analysis.
3. Starts a chronological log of events documenting all actions taken and forensic information gathered from logs and/or tools to identify when the event began. The chronological log will be used to support possible follow-on legal action as determined by NEC's General Counsel and Executive Directors.

TECHNICAL OPERATIONS TEAM

1. Continues analysis and validation process, this will require work from the security team, network team, and possibly expanding to other IT and OT groups as the event details are tracked.
 - a. Review antivirus software information from the source device
 - b. Inspect intrusion detection system (IDS) for records associated with the event
 - c. Review security events and logs in the SIEM
 - d. Once characteristics of the malware have been identified, search malware database and other threat intelligence resources to identify the category, attack vectors, vulnerabilities exploited, systems at risk, how the malware propagates, and guidance on how to remove from the host.
2. In parallel with analysis of the malware, using similar resources, identify any other hosts/devices that are affected or may have been compromised of part of the incident.
3. Reports actions taken and status to the Cyber Incident Response Coordinator.

CYBER INCIDENT RESPONSE MANAGEMENT

1. Assumes responsibility for directing activities regarding the incident.
2. Determines that escalation Level High is not sufficient because there is evidence the attacker has gained access to critical infrastructure, escalates to Critical.
3. Continual risk assessment to evaluate if components of the Disaster Recovery Plan must be enacted to ensure business continuity.

4. Work closely with communication team to coordinate timing and details for required internal and external communication.

EXTENDED TECHNICAL TEAM

1. Acts to aide in forensic analysis and/or contingency planning to mitigate impacts.
2. Reports actions taken; number of personnel involved etc. to Incident Coordinator for the chronological log.

COMMUNICATIONS TEAM

1. Messages NEC employee population regarding impacts to their network connectivity and job activities as directed by the Cyber Incident Response Management.
2. Work with Cyber Incident Response Management for reporting to TSA.

Escalation Level Critical Severity

CYBER INCIDENT RESPONSE MANAGEMENT

1. Directs the Cyber Incident Response Support team to:
 - a. Set up communications between all Cyber Incident Response Team Managers, and the Extended Support Team in the field,
 - b. Assume occupancy of the command center, and
 - c. Initialize an incident voice mail box where status messages can be placed to keep NEC personnel updated.
2. Alerts the Extended Team of the incident notifying them of the Severity Level.
3. Determines when the risk has been mitigated to an acceptable level after the technical operations team had fully contained and started eradication efforts.
4. Statuses Executive Management as appropriate.

EXTENDED TEAM

1. If, applicable, makes arrangements for authority access into the command center.
2. Ensures that all needed information is being collected to support legal action against the attacker, regulatory reporting requirements, and post-incident lessons learned activities.

CYBER INCIDENT RESPONSE COORDINATOR

1. Continues maintaining the Chronological Log of the event.
2. Posts numbered status messages in the incident voice mail box for updating NEC Executive Management Team (if applicable).

COMMUNICATION TEAM

1. Messages NEC employee population regarding impacts to their network connectivity and job activities as directed by the Cyber Incident Response Management.

2. Work with Cyber Incident Response Management for updates to TSA as well as other law enforcement engagement that is required.

TECHNICAL OPERATIONS TEAM

1. Continues to monitor all known sources (e.g., IPS, endpoint protection, vulnerability scanning) for alerts looking for further information or actions to take to eliminate the threat.
2. Continues reporting status to the Cyber Incident Response Coordinator for the chronological log of events.
3. Monitors effectiveness of actions taken to contain and eradicate the threat.
4. Statuses Cyber Incident Response Management on effectiveness of actions taken and progress in eliminating the threat.

EXTENDED SUPPORT TEAM

1. Continues to report actions taken, number of personnel etc. to the Cyber Incident Response Coordinator for the chronological log.
2. Begins documenting recommendations for post incident activities.

Post Incident

CYBER INCIDENT RESPONSE COORDINATOR

1. Coordinate and facilitate post-incident meetings and analysis,
2. Follow on efforts needed to eliminate or mitigate any related vulnerabilities that exist in terms of environment security,
3. Policies or procedures that may require updating to ensure strict oversight of access within NEC,
4. Provides the chronological log and any system audit logs requested by the Extended Team or third parties, and
5. Documents any lessons learned and modifies the Cyber Incident Response Plan accordingly.

CYBER INCIDENT RESPONSE MANAGEMENT

1. Prepare a report for NEC Executive Management to include:
 - a. Overview of the threat and its impacts on the organization,
 - b. Estimated costs associated with the threat,
 - c. Efforts taken to minimize the liabilities of negative exposure of the attack,
 - d. Details of the recovery and lessons learned, and
 - e. Any costs associated with implementing lessons learned and additional mitigation measures.

EXTENDED TEAM

1. Legal works with the authorities to present any information relating to the attacker that may lead to prosecution.
2. Human Resources and IT work with management to determine if disciplinary action is required for the negligent employee.
3. Executive Management Team leveraged to communicate to employees about the seriousness of keeping NEC systems safe and the costs of not doing so, as exemplified in this case.

NEC Emergency Operations Plan

NEC & NEC Co-op Energy Physical Security Annex

NEC's Cyber Security Incident Response Annex also provides the Physical Security Annex information.

Key NEC Security Controls

- All NEC offices utilize panic buttons at the cashier stations that trigger a call to local law enforcement.
- ALL NEC offices are equipped with security cameras and electronic access control systems.
- NEC Headquarters utilize two thermal cameras to secure contractor and storage locations at the facility. These cameras are monitored 24/7 by CRC.
- Security events that are identified by our monitoring vendors are reported to the supervisor on call and the physical facilities supervisor.

IT Department manages all security systems at NEC

Physical Security

- Before Any Attack we PREPARE
 - Plan our response/readiness, identify stakeholders and test/train for readiness
- During Any Attack we DETECT
 - Communicate clearly & engage expertise
- After Any Attack we RESPOND
 - Conduct analyses, identify root causes, and continue to improve our plans, preparedness & procedures

Physical Security

- NEC provides crime and disruption protection through deterrence (fences, gates, warning signs, visitor sign in, etc.)
- NEC reduces potential damages through the use of delaying mechanisms (locks, access badges, etc.)
- NEC provides incident assessment through its response to incidents and determination of damage levels
- NEC incident response procedures (fire suppression, alarm system that immediately reports incidents, etc.)

Physical Security