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§25.53 EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

The Comanche Electric Cooperative Association (CECA) Emergency Operations Plan (EOP) was developed to comply with 16 Tex. Admin. Code §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. 16 TAC §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide the Cooperative with a clear set of guidelines, policies, and procedures intended to guide preparations, responses, and actions related to all phases and types of electric system emergencies. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (16 TAC §25.53) and is intended to guide the organization in the preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

CECA maintains the EOP in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- Provide the structure, policies, and procedures to guide the organization during all types of emergency conditions and situations.
- Enable CECA, other utility and governmental entities, members, and stakeholders to coordinate and communicate effectively during emergency situations and events.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing CECA's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that CECA maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes and includes Appendices that provide additional information related to the EOP.

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 7 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes an introduction and purpose of the plan and a statement regarding the applicability of the EOP. And to emphasize the commitment of the Cooperative's senior leadership, this section includes a "Message from the General Manager" that underscores the importance of the plan and encourages all CECA personnel to learn the plan and work with their respective supervisors and teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for CECA and prescribes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 13 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan section. This section of the plan includes the strategies, key policies, roles, and communications steps that CECA undertakes in an emergency event. Key

policies include tracking and coordination of external communications, the designation of spokesperson(s) for the Cooperative, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses all the requirements in 16 TAC §25.53 regarding communications with the public, the media, CECA members, the PUC, OPUC, local and State Governmental Entities, Officials, and (County) Emergency Operations Centers, ERCOT, and Critical Load members. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

(Section-3) Pre-Identified Supplies for Emergency Response Plan:

This section begins on page 17 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides information on Pre-Identified Supplies for Emergency Response and identifies the guidelines for the management of materials, supplies and resources that CECA may need during emergency events. The plan provides details regarding the internal roles and responsibilities; use of outside suppliers; advance preparation; location of materials and supplies; and other logistical information.

(Section-4) Staffing During Emergency Response Plan:

This section begins on page 18 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP provides information regarding Staffing During Emergency Response and the roles and assignments for CECA personnel during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that CECA will utilize and addresses work schedule for CECA personnel that CECA shall use in significant and major system emergency events.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure:

This section begins on page 25 of the EOP and corresponds to §25.53(d)(5).

The final section of the EOP is the Weather-Related Hazards Identification Plan and EOP Activation Procedure section. CECA has a series of policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This section also provides the policies and procedures related to the activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels identified in the plan.

EOP Annexes

Weather Emergency Annex:

This section begins on page 31 of the EOP and corresponds to §25.53(e)(1)(A).

The Weather Emergency Annex addresses preparation for both hot and cold weather emergencies. The key policies in this section set forth the requirement for CECA to develop and utilize a checklist for CECA to activate in extreme weather situations.

Load Shed Annex:

This section begins on page 36 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding CECA preparations and actions for ERCOT Emergency Event Alerts (EEA) levels and include details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between Brazos Electric Cooperative (ERCOT Transmission Operator) and CECA regarding the planning and preparation for load shed events and contains detailed information regarding other operational information for EEA events. This Annex also contains information on the CECA procedure for restoration coordination with Brazos Electric Cooperative following a load shed event, and key

policies and procedures that CECA utilizes for restoration from significant system outage events. The final subsection of this Annex provides information on CECA's Critical Load Registry and information related to the maintenance of the registry, communication procedures to these members, and other relevant information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 42 of the EOP and corresponds to §25.53(e)(1)(C).

In the Pandemic and Epidemic Annex, CECA has provided the Cooperative's policies, procedures, and guidelines that are designed to prepare for pandemic and epidemic outbreaks, and to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic event. Key policies in this section address the steps CECA takes regarding prevention and preparation, policies related to remote work for CECA personnel, and steps CECA takes to ensure CECA adheres to policies implemented by state and local agencies.

Wildfire Annex:

This section begins on page 45 of the EOP and corresponds to §25.53(e)(1)(D).

The Wildfire plan provides the guidelines, procedures and best practices related to wildfire mitigation and document CECA's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery. This section includes wildfire mitigation actions along with steps CECA would take to respond to any wildfire events.

Hurricane Annex:

This section begins on page 47 of the EOP and corresponds to §25.53(e)(1)(E).

CECA's service is not located in a Hurricane Evacuation Zone (HEZ), and therefore CECA's EOP does not include this annex.

Cyber Security Annex:

This section begins on page 48 of the EOP and corresponds to §25.53(e)(1)(F).

The Cyber Security Annex provides the guidelines, procedures and best practices related to cyber security for the CECA office facilities and electric distribution system. Based on CECA's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security and employee education.

Physical Security Incident Annex:

This section begins on page 51 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures CECA has implemented to protect the office complex and other facilities that are critical to the operation of the CECA electric distribution system. Based on CECA's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for CECA's facilities, visitors, and surveillance.

Plan Distribution and Training

The table below documents the distribution list of the EOP and the associated training document to CECA personnel and the date the training was completed by each employee:

CECA Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Alan Lesley	General Manager	4/18/2022	4/18/2022
Eddie Strube	Operations Director	4/18/2022	4/18/2022
Larry Morgan	System Distribution Coordinator	4/18/2022	4/18/2022
Justin Riley	Line Superintendent	4/18/2022	4/18/2022

PROJECT NO. 53385

**AFFIDAVIT OF GENERAL MANAGER OF
COMANCHE ELECTRIC COOPERATIVE ASSOCIATION, INC.
PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53**

STATE OF TEXAS §

COUNTY OF COMANCHE §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath he or she is entitled to make this Affidavit, and that the statements contained below are true and correct.

I, Alan Lesley, swear or affirm that as an Electric Cooperative operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region and control system, confirms the following:

"I am the General Manager of Comanche Electric Cooperative Association, Inc. (CECA), which is a Texas electric cooperative corporation.

CECA operates an electric distribution utility system in the State of Texas and the Electric Reliability Council of Texas power region.

The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, has been distributed to CECA Managers and Operations personnel;

CECA executives and Operations personnel have received training on the updated EOP;


In accordance with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for CECA Operations personnel is scheduled for a date and time in CY2022 before July 31, 2022;

CECA will notify Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

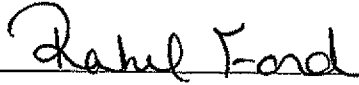
CECA has distributed the EOP to local Jurisdictions, including regional TDEM personnel and all Counties in the CECA service area;

CECA has a Business Continuity Plan related to returning to normal operations after an emergency event or situation;

CECA's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, 20 IS-200, IS-700, and IS-800 National Incident Management System training.

 {Signature of Officer of the Cooperative}
General Manager
Comanche Electric Cooperative, Inc.

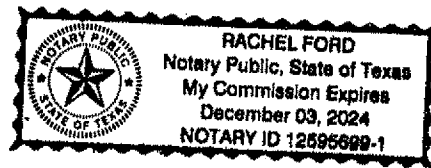
Sworn and subscribed before me on this 18 day of April, 2022



Notary Public in and for the State of Texas

Notary Seal

(Must be notarized by a notary public in and for the State of Texas)



PUC Primary and Backup Emergency Contact List

Primary Emergency Contact:	Alan Lesley
Title:	General Manager
Email:	alesley@ceca.coop
Main Phone:	800 915-2533 ext. 446
Cell Phone:	254 842-8036

Secondary Backup Emergency Contact:	Eddie Strube
Title:	Operations Director
Email:	estrube@ceca.coop
Main Phone:	800 915-2533 ext. 452
Cell Phone:	254 842-4383