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PROJECT NO. 53385

**PURSUANT TO P.U.C. SUBSTANTIVE
RULE 25.53 RELATING TO ELECTRIC
SERVICE EMERGENCY OPERATIONS
PLANS**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**TRENT WIND FARM LLC
ELECTRIC SERVICE EMERGENCY OPERATIONS PLAN
COMPREHENSIVE SUMMARY
FILED IN COMPLIANCE WITH SUBSTANTIVE RULE §25.53**

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April 18, 2022

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I. Executive Summary

Trent Wind Farm (Trent) is a 152-megawatt wind facility located in West Texas south of Interstate 20 – approximately 30 miles west of Abilene and 10 miles east of Sweetwater, in Nolan and Taylor Counties. Trent Wind Farm LLC is the entity responsible for the operation of this facility including emergency planning. Trent Wind Farm LLC is a wholly owned subsidiary of American Electric Power Company, Inc. (AEP).

In accordance with P.U.C. SUBST. R. 25.53(c)(1), Trent files this Emergency Operation Plan (EOP). The purpose of the EOP is to establish procedures and policies to allow for the operation and/or restoration of the Trent facility in a systematic and efficient manner by utilizing all of AEP's human and physical resources.

This EOP includes information regarding Approval and implementation, page 3, section A; a communication plan for providing information to the media, the commission, OPUC, local and state entities, officials and the reliability coordinator, page 3 section B; plans for supplies, page 4 section C; staffing plans, page 4 section D; plan to identify extreme or severe weather and activation of the EOP, page 4 section E; and relevant applicable annexes, pages 5-6, sections F-M. Appendix A, page 7, contains plan distribution and training information. Appendix B, page 8, lists primary and backup contacts during an emergency. Appendix C, page 9, is a revision control summary table. An affidavit signed by the highest ranking entity official is provided.

II. Emergency Operations Plan

- A. Approval and implementation:** This plan shall be reviewed and approved by the Director of Universal Assets, AEP Energy. Site staff will maintain and are responsible for implementation and revisions of the EOP. Revisions will be recorded in a summary table. This current EOP was approved on April 14, 2022. This version supersedes any previous version.
- B. Communication Plan:** Media communications will be provided by AEP Corporate Communications. Communications to the commission and OPUC will be provided by AEP regulatory staff. The site manager, to the extent of their

knowledge will provide communication local and state entities. Communication with the reliability coordinator will be provided through the QSE and/or agent as needed to provide updates to resource availability, capability, and outage updates.

- C. Plan to maintain supplies:** Supplies are identified and checked during weatherization activities. These supplies include, but are not limited to, fuel for emergency generator, extra space heaters and additional fans for deployment if installed heating /cooling fail, bottled drinking water, and ice melt. The facility maintains a comprehensive parts inventory that is replenished throughout the year to promote efficient troubleshooting and prompt repair of the wind turbines. The inventory is stored on site in the Operations & Maintenance building and maintenance sub-warehouse. The type of parts maintained in inventory are those commonly used for repairs. The inventory includes, but not limited to, pitch system batteries, control cards, wind instrumentation, filters, pumps, fans, and electric motors.
- D. Staffing Plan:** The wind farm is monitored remotely 24 hours by the turbine Original Equipment Manufacturer (OEM) at its remote operating center. Wind turbines can be stopped, reset, and started remotely. The wind farm is also staffed by an operations and maintenance team on weekdays during normal business hours. Upon activation of the EOP site personnel will be placed on call when not on site in order to return and restore generation to service as needed when safe to do so. Local staff also has the ability to monitor and operate wind turbines remotely.
- E. Weather identification:** A corporate AEP meteorologist is on staff that provides daily weather information to the site staff. The site staff also utilize a paid subscription weather service for real-time information, forecasts, and severe weather alerts. In addition to the paid service, the site staff will utilize information provided by NOAA and the National Weather Service. The Trent Wind Farm Manager is responsible for activating the EOP based on information described above or in the event of a natural or manmade disaster, pandemic or a State Operations Center (SOC) declared event.

- F. Weather emergency annex:** Preparations are made throughout the year for equipment operation in cold and hot weather in accordance to Substantive Rule 25.55, Weather Emergency Preparedness. As a function of the EOP, increased operator rounds and increased awareness to critical equipment will be executed during time of extreme hot or cold weather. During a severe icing event the turbines may become inoperable due to ice build-up on the blades. However, during less severe icing events an installed Winter Ice Operations Mode (WIOM) package is installed to increase reliability and production. The WIOM adjusts pitch controls to overcome aerodynamic losses due to ice until the ice buildup becomes too great. Fuel switching is not applicable to a wind resource. Preparation checklists for supplies will be reviewed and supplies verified.
- G. Water shortage annex:** Water shortage will not affect the operations of the wind farm and subsequent generation of electricity
- H. Generation restoration annex:** Wind turbines can be reset and started remotely when available to operate. If the wind turbine must be attended in person, on-call staff will be dispatched if it is safe to do so. Access to turbines is prohibited during ice shedding.
- I. Pandemic and epidemic annex:** Trent Wind Farm and OEM personnel will follow the applicable corporate pandemic guidelines regarding activities to reduce exposure to infectious diseases. The site will also follow applicable corporate guidelines to ensure Business Continuity.
- J. Hurricane annex:** Trent Wind Farm is located in Nolan and Taylor counties in West Texas nearly 400 miles from Gulf Coast. Hurricanes pose little to no threat.
- K. Cyber security incident annex:** AEP Cyber Risk and Security Services personnel will follow the applicable corporate policies and procedures regarding reporting of cyber security incidents.
- L. Physical security incident annex:** AEP Personnel will follow the applicable policies and procedures regarding reporting physical security incidents.
- M. Wildfire annex:** Site personnel will assist first responders to wildfire activity by providing access to areas under entity control, operation of wind farm equipment,

notification of landowners and lessees, and other needs of responders within reason and within the level of training. Site personnel will not engage in firefighting activities beyond their level of training.

III. Conclusion

Trent's plans are a comprehensive set of procedures and outlined responsibilities to be used before, during and after a major emergency. Trent utilizes its own resources and calls upon other suppliers and service vendors as needed during emergency situations in order to promptly bring the facility back in service and in a safe manner. Although it is impossible to anticipate all potential emergency situations, Trent is dedicated to minimizing the risk and alleviating the effects of any situation that may arise.

Appendix A: Plan Distribution and Training

REDACTED

Appendix B: Contacts During an Emergency

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Appendix C: Revision Control Summary

Version	Description	Date
0	2022 submittal pursuant to newly amended Substantive Rule 25.53	4/14/2022

ATTACHMENT A: AFFIDAVIT OF GREG B. HALL

EMERGENCY OPERATIONS PLAN AFFIDAVIT OF GREG B. HALL

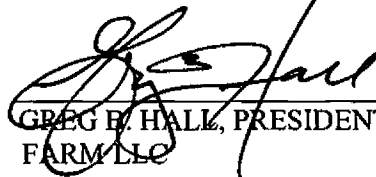
STATE OF OHIO

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COUNTY OF FRANKLIN

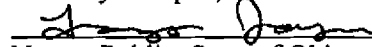
BEFORE ME, the undersigned authority, on this day personally appeared **GREG B. HALL**, who, after being duly sworn, stated on their oath that the following statements contained below are true and correct, to the best of his knowledge:

1. My name is **GREG B. HALL**. I am over the age of 18 and fully competent to make this affidavit.
2. I am **PRESIDENT**, the highest-ranking representative, official, or officer with binding authority over power generation company ("PGC") **TRENT WIND FARM LLC**, PGC No. **20052**.
3. Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan ("EOP") filed with the Public Utility Commission of Texas ("PUCT") in Project No. 53385 on April 14, 2022, and such personnel have been instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
4. The EOP has been reviewed and approved by the appropriate executives.
5. This EOP was submitted by April 15, 2022 during the first calendar year in which the PUCT's amendments to 16 Texas Administrative Code ("TAC") § 25.53 became effective, and therefore drills have not yet been conducted pursuant to subsection (f) of 16 TAC § 25.53. **TRENT WIND FARM LLC** intends to conduct a drill to the extent required by 16 TAC § 25.53(f) subsequently during this calendar year and will provide notice to PUCT Staff after the completion of the drill.
6. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.
7. **TRENT WIND FARM LLC** maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
8. **TRENT WIND FARM LLC**'s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will complete the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training by May 15, 2022.



GREG B. HALL, PRESIDENT, TRENT WIND
FARM LLC

SUBSCRIBED AND SWORN TO BEFORE ME on the
14th day of April, 2022.



Notary Public, State of Ohio
My commission expires: 4-15-24



TANGY JOYCE
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires 4/15/2024