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Received - 2022-04-18 05:04:39 PM

Control Number - 53385

ItemNumber - 450

**Switch, Ltd.
Initial Emergency Operation Plan
Pursuant to Public Utility Commission of Texas
Substantive Rule § 25.53 and Order dated 2/25/22**



Initial EOP

4-18-22 Revision: 0

SWITCH, LTD.'S

INITIAL EMERGENCY OPERATIONS PLAN

**PURSUANT TO THE PUBLIC UTILITY COMMISSION OF TEXAS
SUBSTANTIVE RULE § 25.53
(16 TAC § 25.53)**

I. EXECUTIVE SUMMARY

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

Switch's EOP affidavit is on page 4.¹

The Approval and Implementation section (Section III of the EOP) provides includes the Introduction and Applicability of the EOP. Beginning on page 6, it explains that Switch is an Option 2 Retail Electric Provider (REP), and its confidential EOP prepared by Switch in the event of an emergency. Consistent with the applicable rule the EOP itself is confidential and will not be provided in the information submitted to the Public Utility Commission of Texas (PUC or Commission); however, it will be submitted under seal to ERCOT.

Switch's comprehensive plan to all emergency events, both natural and man-made threats, is holistic. This method uses a "multi-hazards" approach which allows for a structured and fully scalable response in the event of a significant interruption. There is a large and unpredictable number of scenarios that can occur concurrently. Therefore, to effectively address the myriad of potential scenarios (such as earthquake, pandemic, and power outage) that could impact the Company, the EOP addresses recovery from a scenario outcome perspective (loss of work location, loss of staff, loss of IT system) rather than a scenario-specific perspective, or having multiple scenario-driven plans.

Also within Section III is the required list of individuals responsible for maintaining, implementing, and having the authority to change the EOP; the Revision Control Summary; the dated statement that the current EOP supersedes previous EOPs, and the date this EOP was most recently approved.

Section IV of Switch's EOP is the Communication Plan. This plan addresses all aspects of required communication in the event of an emergency.

Section V addresses the plans to maintain pre-identified supplies in the event of an emergency.

Section VI addresses staffing plans for an emergency event.

Section VII identifies the plan addressing how Switch identifies possible emergencies such as weather-related hazards—tornadoes, hurricanes, extreme cold or hot weather, drought, flooding. This also contains the process for activating the EOP.

Finally, the EOP contains three Annexes²:

- Cyber Security Annex;
- Pandemic and Epidemic Annex; and
- Physical Security Incident Annex.

¹ 16 TAC § 25.53(c)(4)(C).

² 16 TAC § 25.53(e)(3)(A)-(D).

Pursuant to the rule, the Primary Emergency Contact is as follows:

PRIMARY EMERGENCY CONTACT³
Alise Porto VP of Sustainability, Switch, Ltd. +1 (702) 522-5366 office +1 (702) 280-1823 mobile <u>Alise@switch.com</u>

Moreover, the Record of Distribution includes the names and titles of the people receiving access to and training on the EOP as well as the date(s) of such.⁴ The Record of Distribution is shown below. A complete Record of Distribution is confidential and will be provided in the unredacted version at ERCOT.

Record of Distribution and Training of EOP			
Name	Title	Distribution Date	Training Date
Alise Porto	VP of Sustainability	4/18/2022	4/13/2022

³ 16 TAC § 25.53(c)(4)(B).

⁴ 16 TAC § 25.53(c)(4)(A).

AFFIDAVIT OF THOMAS MORTON

STATE OF NEVADA
COUNTY OF CLARK

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

1. I, Thomas Morton, am the President and Chief Legal Officer of Switch, LTD., (Switch) a Public Utility Commission of Texas (Commission or PUC) certified Option 2 retail electric provider (REP) in the Electric Reliability Council of Texas (ERCOT) [certificate number 10297]. I am one of the highest-ranking officers with binding authority on behalf of Switch.
2. This affidavit is being submitted with Switch's Initial EOP as required by 16 TAC § 23.53(c)(4)(C)(i)-(vi) (aka P.U.C. Subst. R. § 25.35(c)(4)(C)).
3. Contained herein is Switch's Initial Emergency Operations Plan (EOP) as required by P.U.C. Substantiative Rule § 25.53.
4. All relevant personnel of Switch are familiar with and have received training on the applicable contents and execution of Switch's EOP, and have been instructed to follow the applicable portions of Switch's EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.
5. Switch's EOP has been reviewed and approved by all appropriate Switch executives.
6. Switch will conduct drills as required by, and relevant to, 16 TAC § 25.53(f).
7. Switch's EOP and/or Executive Summary is distributed as needed to local jurisdictions, pursuant to applicable law or regulatory authority.
8. Switch has a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
9. Switch's personnel designated to interact with local, state, and federal emergency management officials has received the IS-100, IS-200, IS-700, and IS-800 NIMS training.
10. A complete copy of Switch's Initial EOP has been filed at the PUC with all confidential portions removed, pursuant to the 16 TAC § 23.53(c)(1)(ii).

11. Switch's Initial EOP has been filed, pursuant to 16 TAC § 23.53(c)(5). Information and materials contained in Switch's EOP are confidential by law, and include, but are not limited to, highly-confidential trade secret, intellectual property, security, competitively sensitive commercial, financial, and economic information proprietary to Switch.

12. The confidential Switch Initial EOP, and any unredacted version thereof, is for the sole use of the intended recipient(s), and any unauthorized review, copy, use, disclosure, or distribution is strictly prohibited.



President
Switch, LTD

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

{Notary Stamp}


Notary

