



## Filing Receipt

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# **Consolidated Edison Clean Energy Businesses**

## **Emergency Operations Plan (EOP)**

### **Executive Summary**

The purpose of this Emergency Operations Plan is to ensure a comprehensive document of reference is available and accessible to designated individuals with up-to-date information necessary so that operations of this generation resource can mitigate the negative impact and/or recover from a multitude of disasters. The plan actions are intended to mitigate health risks to plant personnel and people in the surrounding community, as well as minimize adverse impacts to the environment.

Individuals responsible for implementing the Plan include all employees at the facility and any contractors performing work at the site. This procedure is a combined procedure for CEB and employees of all Texas Facilities are expected to follow. This general overarching procedure refers to other Emergency Procedures noted in Attachment section.

The application of this specific procedure is limited to the following photovoltaic Solar sites:

**Upton Solar 1 (SPTX12B\_RN)**  
**Texas Solar 3- Alamo 3**  
**Texas Solar 4- Alamo 4 (Eclipse- Unit 1)**  
**Texas Solar 5- Alamo 5 (Helios)**  
**Texas Solar 7- Alamo 7 (Solara- Unit 1)**

This plan addresses the following:

- Communications Plan
- Hazard Identification
- Common operational functions relevant across emergency types and annexes that the entity
- response to specific types of emergencies
- Summary of Weatherization Plans & Procedures
- Fire Response Event
- Physical Security Event
- Cyber Security Event
- Pandemic Event
- Immediate Site Evacuation Procedure
- Designated Egress Routes & Muster Areas for Evacuations
- Staffing During Severe Weather Events
- Drills/ Training
- Reporting Requirements
- Pre-identified Supplies

### **Filing Requirements**

Filing Requirements	PUC Rule	Status
Executive Summary	§25.53(c)(1)(A)(i)	Filed Separately
Description of Content and Policies	§25.53(c)(1)(A)(i)(I)	<i>Within Executive Summary</i>
References to Sections and Page #s	§25.53(c)(1)(A)(i)(II)	<i>Within Executive Summary</i>
Records of Distribution	§25.53(c)(1)(A)(i)(III) §25.53(c)(4) (A)(i) §25.53(c)(4) (A)(ii)	<i>Within Executive Summary</i>
Affidavit	§25.53(c)(1)(A)(i)(IV) and §25.53 (c)(4)(C)	Attachment  <i>Attachment to Executive Summary</i>
Copy of EOP	§25.53 (c)(1)(A)	Confidential Portions Redacted
ERCOT Copy	§25.53(c)(1)(B)	Entire-No redactions
PUCT Copy	§25.53(c)(1)(D)	Complete Copy Available

### **Distribution of the Emergency Operations Plan includes:**

Name	Title	Received Copy of EOP	EOP Trained
Chris Moore	Upton O&M Manager	X	4/15/2022
Shanon Amonette	CEB Manager, Compliance	X	4/15/2022
James Dixon	VP& Compliance Officer	X	4/18/2022
Timothy Fagan	Managing Director	X	4/18/2022
John Bahrs	Director Operations	X	4/18/2022
Philip Neal	Regional Manager	X	4/18/2022
David Raines	Manager, EH&S	X	4/15/2022
Alec Jones	O&M Manager	X	Trained on EAP and Cold Weather Prep/ To be trained on EOP by June 30 <sup>th</sup> 2022

Craig Stephens	O&M Manager	X	Trained on EAP and Cold Weather Prep/ To be trained on EOP by June 30 <sup>th</sup> 2022
Richard Gonzales	Senior Site Operator	X	Trained on EAP and Cold Weather Prep/ To be trained on EOP by June 30 <sup>th</sup> 2022
Curtis Coffman	Senior Site Operator	X	Trained on EAP and Cold Weather Prep/ To be trained on EOP by June 30 <sup>th</sup> 2022

### **Affidavit**

Attached to Executive Summary

### **Specific Page numbers by Section:**

- Approval and implementation of EOP – Page 2, Page 14, and Page 15
- Individuals to maintain & implement as well as update the EOP - Page 15, Page 16
- EOP revision control Summary- Page 15
- Dated statement since the prior EOP and supersedes previous EOP - Page 15
- Date of EOP approval - Page 16
- Communication Plan – Page 2
- Media Plan- Page 9
- A plan to maintain pre-identified supplies for Emergency response - Page 11 and Referenced within each EAP (Appendix 1, 2, 3)
- A plan for staffing during an emergency response - Page 9
- Reporting Requirements- Page 13
- Training- Page 11 and Page 12
- Drills- Page 11
- Hazard Identification- Page 10 and Page 11
- Plan for Weather Related- Cold Weather Planning Plan- Appendix 4 to EOP- Page- 62, Annex A Page 70, EAP Plan- Section 5.5 and Page 11 of EOP

### **Annexes to Be Included:**

- Annex A- PUC REQUIREMENT: Section 25.53 (e)(2)(A) - Weather Emergency Annex- Page 71
- Annex B- PUC REQUIREMENT: Section 25.53 (e)(2)(B) - Water Shortage Annex- N/A- Page 72

- Annex- C- PUC REQUIREMENT: Section 25.53 (e)(2)(C) - Restoration of Service Annex- Page 73
- Annex D- PUC REQUIREMENT: Section 25.53 (e)(2)(D) - Pandemic and Epidemic Response- Page 74
- Annex E- PUC REQUIREMENT: Section 25.53 (e)(2)(E) - Hurricane Annex- N/A- Page 75
- Annex F- PUC REQUIREMENT: Section 25.53 (e)(2)(F) - Cyber Security Annex- Page 76
- Annex G- PUC REQUIREMENT: Section 25.53 (e)(2)(G) - Physical Security Incident Annex- Page 77
- Annex H- PUC REQUIREMENT: Section 25.53 (e)(2)(H) - Additional Annexes Particular to Utility - N/A- Page 78

**AFFIDAVIT OF Consolidated Edison Clean Energy Businesses on behalf  
of Upton Solar, Alamo3, Alamo 4, Alamo 5, and Alamo 7**

Pursuant to 16 Tex. Admin. Code §§ 25.53(c)(4)(C) and (c)(1)(A)(i)(IV)

POWER GENERATING COMPANY COMPLIANCE FILING PURSUANT TO P.U.C.  
SUBSTANTIVE RULE § 25.53

1. I am \_\_\_\_\_. I am the Chief Compliance Officer for Consolidated Edison Clean Energy Businesses. I am familiar with the facts attested to herein.
2. I am familiar with Generator's Emergency Operations Plan ("EOP") being filed with the Public Utility Commission of Texas in accordance with P.U.C Substantive Rule 25.53. I am the entity's highest-ranking officer with binding authority over the Generator.
3. The CEB EOP contains confidential, security-sensitive information that requires filing under seal in accordance with P.U.C Procedural Rule 22.71 (d).
4. As required by P.U.C Substantive Rule 25.53 (c)(4)(C)(i), I affirm that all relevant operating personnel for Generator are familiar with the contents of the EAP at each facility and that such personnel are instructed to follow the applicable portions of the EAP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
5. I affirm that the EOP has been reviewed and approved by appropriate management as required by P.U.C Substantive Rule 25.53 (c)(4)(C)(ii).
6. I affirm that an emergency drill or event has been conducted in 2021 to the extent required by P.U.C Substantive Rule 25.53(f). Generator will conduct additional drills as required and will notify commission staff and appropriate Texas Division of Emergency Management personnel of one of these drills at least 30 days prior to the date of such drill.
7. I affirm that the EOP or an appropriate summary has been distributed to local jurisdictions as needed, pursuant to P.U.C Substantive rule 25.53 (c)(4)(C)(iv).
8. I affirm that Generator maintains plans for business continuity that addresses returning to normal operations after disruptions caused by an incident, as required by P.U.C Substantive rule 25.53 (c)(4)(C)(v).
9. I affirm that one of the Generator's emergency management personnel who is designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS100, IS200, and IS800 National Incident Management System training, as required by P.U.C Substantive Rule 25.53(c)(4)(C)(vi). Remaining Generator's emergency management personnel designated to interact with local, state, and federal emergency management officials will receive training prior to June 30, 2022.

\_\_\_\_\_  
James Dixon



# EMERGENCY OPERATING PLAN

## CEB- TX SITES


UPTON COUNTY SOLAR

ALAMO 3

ALAMO 4

ALAMO 5

ALAMO 7

EMERGENCY OPERATIONS PLAN			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date: 04/15/2022

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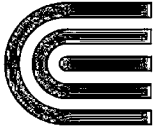
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## PURPOSE, SCOPE, AND IMPLEMENTATION

The Emergency Operations Plan is intended to ensure Consolidated Edison Clean Energy Business (CEB) Texas Solar Project personnel working at the O&M offices receive the information, tools, and action plans to manage an emergency event or situation. The EOP addresses both common operational functions that are relevant across emergency types.

Specifically, this plan was developed to:

- Facilitate quick and proper reaction to an emergency with a priority toward protecting human life first and then property
- Provide the structure and processes to guide CEB Texas Facilities during emergency conditions.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner
- Ensure proper notification to the regulatory agencies and company personnel.

Individuals responsible for implementing the Plan include all employees at the facility and any contractors performing work at the site. This procedure is a combined procedure for CEB and employees of all Texas Facilities are expected to follow. This general overarching procedure refers to other Emergency Procedures noted in Attachment section.


The information in this plan should be considered a proprietary document, and the contents of this document should be considered Company Confidential.

The application of this specific procedure is limited to the following photovoltaic Solar sites:

**Upton Solar 1 (SPTX12B\_RN)**  
**Texas Solar 3- Alamo 3**  
**Texas Solar 4- Alamo 4 (Eclipse- Unit 1)**  
**Texas Solar 5- Alamo 5 (Helios)**  
**Texas Solar 7- Alamo 7 (Solara- Unit 1)**


## 1. COMMUNICATIONS PLAN

CEB recognizes the importance of effective communication during the normal course of business, as well as during an Emergency. CEB operating personnel have full authority to take

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whatever actions they deem safe and necessary to address an emergency condition without first seeking supervisory approval.

- 1.1.1 CEB operating personnel shall notify the most Senior Manager available at the plant as soon as possible. In the notification, provide as much information regarding the following:
  - a. Nature of the emergency
  - b. Information regarding any
  - c. injury (number and condition)
  - d. Hazards that still exist
  - e. Location (address or GPS location)
  - f. Contact information
- 1.1.2 CEB operating personnel shall contact 3<sup>rd</sup> parties potentially impacted, using any means available.
- 1.1.3 Facility personnel shall notify the appropriate internal contacts (e.g. engineering, management, network infrastructure) of the Emergency situation.
- 1.1.4 Media
  - 1.1.4.1 Responding swiftly in any crisis is critical to managing the situation effectively. Often the first few hours determine success or failure in crisis media management. Company personnel should tell any press at the scene that someone with responsibility for communicating with them will arrive soon. Plant personnel shall not make statements to, nor answer questions from, the media or OPUC personnel.
  - 1.1.4.2 A single location will be designated for the formation of escorted tours to visit areas of interest that are secure and approved by the Site Manager for observation. Unauthorized persons are not allowed onto the site until the emergency situation has been stabilized. It is extremely

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important that the plant entrance be kept clear for emergency response vehicles.

1.1.4.3 Since the media monitors the emergency radio frequencies, an emergency event may attract the media. Immediately notify the Site Manager, who can coordinate arrangements for a qualified spokesperson to release a press statement

#### 1.1.5 ERCOT and PUCT Communications

1.1.5.1 Any communication to ERCOT (including in its capacity as RC) and PUCT shall be done through Facilities QSE. In cases where the QSE will not directly notify ERCOT on Facility's behalf, ERCOT's secure and recordable line: (512) 248-3900 or at [ClientServices@ERCOT.com](mailto:ClientServices@ERCOT.com).

1.1.5.2 Any communication should include a log of the date, time, identity of who was spoken with, and a description of the communication and any information relayed to the entity.

#### 1.1.6 Local and State Government and State Emergency Operations Center Communications

Communication with local government entities, such as Fire and Police officials, and with state emergency operations centers should be done through Facility QSE or Facility O&M Manager. That communication should be logged in the sites daily log.


#### 1.1.7 Fuel Suppliers

1.1.7.1 Not applicable. The site does not have any fuel suppliers supplying fuel to generate electricity at the site.

## Emergency Contacts

### Internal


Facility	Name	Title	Phone #
Upton	Chris Moore	O&M Manager	REDACTED

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Upton	Curtis Coffman	Sr. Site Operator	REDACTED
Alamo 3, 4, 5	Alec Jones	O&M Manager	REDACTED
Alamo 7	Craig Stephens	O&M Manager	REDACTED
Alamo 7	Richard Gonzales	Senior Site Operator	REDACTED
All Sites	Phillip Neal	Regional Manager	REDACTED
All Sites	John Bahrs	Director, Operations	REDACTED
All sites	Shanon Amonette	Manager, Compliance	REDACTED
All Sites	Chris Coronel	Manager, Power Engineering	REDACTED
All Sites	David Raines	Manager, EH&S	REDACTED

### External

<b>Any Emergency</b>	<b>Dial 9-911 for immediate outside assistance for Emergency Management Service (EMS)</b>
<b>Weather- Weather Bug</b>	<a href="http://weather.weatherbug.com/">http://weather.weatherbug.com/</a>
<b>Weather- Local</b>	<a href="http://www.acuweather.com">http://www.acuweather.com</a>
<b>Poison Control</b>	<b>(800) 222-1222</b>
<b>Road Conditions</b>	<b>Localconditions.com</b>
<b>Vistra Notifications</b>	<b>Steven Schauwecker – 214-470-2127</b> <b><a href="mailto:Steven.Schauwecker@luminant.com">Steven.Schauwecker@luminant.com</a></b>  <b>Wade Johnston – 903-577-5082</b> <b><a href="mailto:wade.johnston@luminant.com">wade.johnston@luminant.com</a></b>
<b>QSE for Upton County</b>	<b>Austin Energy (512) 322-6128</b>
<b>QSE for Alamo 7</b>	<b>CPS Energy (210-353-3400)</b>
<b>QSE for Alamo 5</b>	<b>CPS Energy (210-353-3400)</b>
<b>TP, TOP, TO- Upton County</b>	<b>LCRA Transmission Services</b> <b>512-730-5510/ 512-730-5540</b>
<b>TP, TOP, TO- Alamo 7</b>	<b>AEP (877)-806-2625</b>
<b>TP, TOP, TO- Alamo 5</b>	<b>STEC (361) 485-6300</b>

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Nearest hospital	Contact Found in EAP for applicable site location
Local Police	Contact Found in EAP for applicable site location
Local Fire	Contact Found in EAP for applicable site location
Local hospital	Contact Found in EAP for applicable site location
Nearest Medevac	Contact Found in EAP for applicable site location
Nearest Snake Anti-Venom	Contact Found in EAP for applicable site location

#### Facility Physical Addresses:

Facility	Physical Facility Address	County	City/ State
Alamo 3	REDACTED	Bexar	Converse, TX
Alamo 4 (Eclipse)	REDACTED	Kinney	Brackettville, TX
Alamo 5 (Helios)	REDACTED	Uvalde	Uvalde, TX
Alamo 7 (Solara)	REDACTED	Haskell	Haskell, TX
Upton (SPTX12B_RN)	REDACTED	Upton	McCamey, TX

An emergency or crisis involving media Texas Facility could take many forms, including:


- ☐ A major hurricane, fire or other natural disaster
- ☐ Violence in the workplace, resulting in serious injury or death
- ☐ Kidnapping or extortion of a company employee
- ☐ Untimely death of a senior executive
- ☐ Terrorism
- ☐ Serious ethics or legal violations by an employee or several employees
- ☐ Unwanted environmental release

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## 2. ROLES AND RESPONSIBILITIES

This section defines responsibilities for CEB staff serving four roles as detailed in the chart and paragraphs below. A summary of these roles/responsibilities follows:

ROLE	RESPONSIBILITY SUMMARY
<b>Operating Personnel</b>	<p>Inclusive of onsite Texas Facility employees and Texas Facility Provisioned Contractors (when acting in an operations role on behalf of Texas Facility) operating the Texas Facility assets.</p> <p>Responsible for the safe, efficient, and compliant operation of Texas Facility. Follow the directions contained in this EOP.</p>
<b>Emergency Action Coordinator (EAC)</b>	<p>Overall responsibility for emergency response for CEB.</p> <p>Responsible for:</p> <ul style="list-style-type: none"> <li>➤ Implementing and maintaining this emergency plan;</li> <li>➤ Determining where resources are necessary and staff those needs;</li> <li>➤ Updating the plan through periodic reviews and annual amendments;</li> <li>➤ Documenting changes to this plan using the Appendix A log sheet;</li> <li>➤ Ensuring consistency with regulatory changes;</li> <li>➤ Serving as the lead during any emergency at the Solar Project</li> <li>➤ Coordinating the response to emergencies;</li> <li>➤ Ordering evacuation responses as necessary;</li> <li>➤ Communicating and coordinating with outside agencies;</li> <li>➤ Providing site maps to responding offsite emergency personnel;</li> <li>➤ Overseeing a formal incident investigation and emergency response critique within 24 hours of any incident triggering implementation of this EOP;</li> <li>➤ Communicating appropriate feedback to staff after the post-incident review has been</li> </ul>

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ROLE	RESPONSIBILITY SUMMARY
	completed.
<b>Emergency Evacuation Coordinators (EEC/ Control Room Operator CRO)</b>	Coordinates evacuation for the EAC.
<b>Agency and Media Coordinators (AMC)</b>	CEB representative authorized to discuss information on the emergency with the media.

## 2.2 The Emergency Action Coordinator (EAC)

### Primary Emergency Action Coordinator:

Upton: Chris Moore, O&M Manager

Alamo 3, 4, 5: Alec Jones, O&M Manager

Alamo 7: Craig Stephens, O&M Manager

### Alternative Emergency Action Coordinator:

Upton: Curtis Coffman, Sr. Site Operator

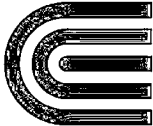
Alamo 3, 4, 5: Richard Gonzales, Sr. Site Operator

Alamo 7: Richard Gonzales, Sr. Site Operator

A report will be prepared to summarize the results of the formal incident investigation and emergency response critique completed after any incident that requires implementation of this EOP. This report will be reviewed with the senior management team and staff, with the goal of identifying any opportunities that may enhance CEB's response to future emergencies. A formal report will be completed and made available to all CEB personnel for review. The report will contain all information required to be submitted to applicable regulatory agencies as required.

## 2.3 Emergency Evacuation Coordinators (EEC)

The Emergency Evacuation Coordinators must ensure that any necessary evacuations are conducted safely, and employees exit to the designated Muster Point. The EEC's will be

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notified when an evacuation is required by the EAC, who will also delegate responsibility to the EEC's to ensure employees' orderly departure from the building. Other EEC duties include keeping the EAC informed of the condition of injured personnel and communicating with the Emergency Response representatives as directed by the EAC.

The following employees have been designated as EECs for the office:

Upton: Chris Moore, O&M Manager

Alamo 3, 4, 5: Alec Jones, O&M Manager

Alamo 7: Craig Stephens, O&M Manager

## 2.4 Agency and Media Coordinator (AMC)

The Agency and Media Coordinator will respond to all inquiries from the news media and outside public agencies. Only the AMC or his/her designee is authorized to provide comments on any emergency that may occur at the office unless another is directed to do so by either the AMC or the alternate AMC. The AMC will draft press releases and will serve as CEB's communication representative to the media and provide information as deemed appropriate.

Agency and Media Coordinator

Primary: David Oravez

Work: REDACTED

Mobile

Email:


## 2.5 CEB Staff

The CEB Facility is staffed by qualified operating personnel who are available for addressing real-time routine and emergency conditions.

All CEB Employees are responsible reviewing and complying with the requirements of this EOP and for notifying their supervisor or the EAC of potential hazards not adequately controlled by measures specified in this plan.

# 3. HAZARD IDENTIFICATION

This Plan is based upon an assessment of the potential risks arising from the Operations and Maintenance of the project (including the surrounding environment). It is impossible to foresee every conceivable circumstance under which an emergency can occur. For this reason, there are instances where this plan may have to be modified to fit a particular situation.

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The designation of an event or incident as an Emergency will generally fall into the following types and levels:

- Pre-Emergency
- Significant Event(s) (E-1)
- Major Event(s) (E-2)
- Catastrophic Event(S)
- Recovery

**Pre-Emergency Preparation (P)** CEB continues to conduct normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.

Typically lasts up to 24 to 72 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.

**Significant Event(s) (E-1)** The event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric service in one or more districts, with power being restored to all areas within 24 hours)

**Major Event(s) (E-2)** is power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal field work.

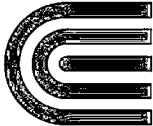
Major Events are severe but not yet catastrophic. This type of Emergency needs to be monitored closely to determine if it will escalate to a catastrophic condition.

#### **Catastrophic Event(S)**

A Catastrophic Event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster. In a Catastrophic Event (E-3) the organization will experience significant economic loss if the event lasts longer than 72 hours.

#### **Recovery**

After an Emergency, the Generating Facility will require a time to return to normal operations.

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## 4. EMERGENCY ACTION PLAN

Reference the Emergency Action Plan (Appendix 1-3) for Procedure Specific information on:

- Fire
- Earthquake
- Accidents Involving Serious Injury and/or Medical Emergencies
- Severe Weather
- Bomb Threat
- Evacuation Response
- On-Site Security Threat
- Emergency Action in Adjacent Facility
- Emergency Alarm System

## 5. DRILLS


Ensure that three days of emergency rations and water are available for on-site monitoring staff.

An emergency drill or event is to be conducted annually to the extent required by P.U.C Substantive Rule 25.53(f). Generator will conduct additional drills as required and will notify commission staff and appropriate Texas Division of Emergency Management personnel of one of these drills at least 30 days prior to the date of such drill.

- In addition to initial training for all Texas Site Operating Personnel, the Site Manager will notify any affected Operating Personnel and verify that each understand the content. Operating personnel will discuss any items that require clarification with the Site Manager.
- In the event that the EOP is required to be activated, that will count as the annual drill.

## 6. TRAINING

Training shall be provided to all site personnel to ensure they understand their roles and

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responsibilities in emergency action response. This training shall be provided initially during mandatory site safety orientation, annually, or whenever there are changes to the response plan.

The following topics shall be covered in the training:

- Overview of the Emergency Action Plan;
- Roles and responsibilities;
- Locations of muster points (i.e. emergency assembly areas);
- Pre-determined routes used to reach emergency assembly areas;
- Procedures to follow in the event of specific emergency situations;
- Locations of fire extinguishers and first aid kits;
- Site emergency contact information; and
- Details of equipment to be utilized during emergency situations
- Alarm stations, air horns, two-way radios and firefighting equipment.


Additional Training Requirements:

The Site Manager and qualified designees shall take FEMA Incident Command Training, through the FEMA ICS and NIMS Course website.

- ◆ Course Numbers and description for required training:
  - ICS-100 Introduction to the Incident Command System
  - ICS-200 ICS for Single Resources and Initial Action Incidents
  - IS-700 National Incident Management System: An Introduction
  - IS-800 National Response Framework: An Introduction

Note: The Site O&M Managers and qualified designees will report completion of NIMS training completion before June 30<sup>th</sup>, 2022.

## 7. SUPPORTING INFORMATION

EMERGENCY OPERATIONS PLAN			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date: 04/15/2022


**a. Reporting Requirements**

- When required, CEB will provide reports during an activation of the State Operation Center (SOC) by the Texas Division of Emergency Management (TDEM) to the P.U.C and its staff consistent with Section 25.53(g) and will provide voluntary reporting to the P.U.C associated with significant outages as outlined in CEB procedures. CEB also recognizes additional NERC and ERCOT reporting that may be associated with major events.

**b. References**

Pertinent documents related to or referenced in this procedure.

DOCUMENT	DESCRIPTION
<b>Appendix 1</b>	Upton County Solar Emergency Action Plan
<b>Appendix 2</b>	Alamo 7 Emergency Action Plan
<b>Appendix 3</b>	Alamo 3,4, 5 Emergency Action Plan
<b>Appendix 4</b>	CEB Texas Cold Weather Planning Plan
<b>ANNEX A</b>	Weather Emergency Annex
<b>ANNEX B</b>	Water shortage
<b>ANNEX C</b>	Restoration of Service
<b>ANNEX D</b>	Pandemic and Epidemic Annex
<b>ANNEX E</b>	Hurricane
<b>ANNEX F</b>	Cyber Security


EMERGENCY OPERATIONS PLAN			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date: 04/15/2022

DOCUMENT	DESCRIPTION
<b>ANNEX G</b>	Physical Security Incident
<b>ANNEX H</b>	Additional Annexes Particular to Utility

**c. Definitions**

Acronyms or definitions specific to this procedure that are not generally used globally in Operating processes:

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

EMERGENCY OPERATIONS PLAN			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date: 04/15/2022

TERM	DEFINITION
<b>Hazard</b>	A natural, technological, or human caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to continuity of electric service.
<b>Threat</b>	The intention and capability of an individual or organization to ham life, information, operations, the environment, or property, including harm to the continuity of electric service

**d. Retention of Evidence and Documentation**


The following evidence retention is necessary for Operations and compliance management related to this Procedure. Each document shall be retained per any CEB Records Retention Schedule (Schedule /current version), per the appropriate Category and Functional Area as described in the Schedule and its Retention Rules.

- Prior versions of this document shall be retained per the CEB Records Retention Schedule (Schedule) (current version), per the appropriate Category and Functional Area as described in the Schedule and its Retention Rules Policy Schedules.

**e. Version History**

Version #	Description of Change	Approved By	Date
1	Original version to comply with Public Utility Commission of Texas Substantive Rule § 25.53 requirements adopted in Project No. 51841	Shanon Amonette	04/12/2022

## 8. PERIODIC REVIEW PROCEDURE AND APPROVAL

EMERGENCY OPERATIONS PLAN			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date: 04/15/2022

**a. Review Criteria**

- This procedure shall be reviewed periodically to assure adherence to the current Public Utility Commission of Texas Substantive Rule § 25.53 requirements adopted in Project No. 51841 This procedure will also be reviewed against any other applicable agreement or regulatory changes that may have occurred since the approval of the current version of this document.

**b. Frequency**

- This procedure shall be reviewed as follows:

Frequency	Specifics
Annually	Annually
Quarterly	
As-needed	Based on any changes to PUCT EOP orders.
Other	-

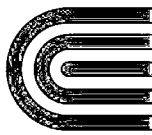
**c. Incorporation of Changes**

- This procedure will be effective following approval as of the Effective Date in the header.

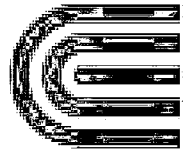
## APPROVAL

Approved By	Signature	Date
REDACTED	REDACTED	REDACTED

## APPENDICES & ENDNOTES

EMERGENCY OPERATIONS PLAN		 <b>conEdison</b> Clean Energy Businesses	
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date:04/15/2022

<h1>Appendix 1</h1>	<h1>Upton County Solar Emergency Action Plan</h1>
---------------------	---



**conEdison**

Clean Energy Businesses

Upton 1 – Texas Solar

Emergency Action Plan

4/1/2022

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## 1.0 Purpose and Scope

The purpose of the Emergency Action Plan (EAP) is to provide con-Edison Development personnel working at the PA Solar Park with immediate actions, requirements, points of contact, and any follow-up actions to be taken in the event of emergencies, including but not limited to the following:

- Fire
- Medical emergencies
- Severe weather
- Other emergencies

Implementation of the EAP, as described herein, will protect life, environment and property during an emergency. This Emergency Action Plan is in compliance with OSHA 29 CFR 1910.38 regulations.

## 2.0 Emergency Contacts

### 2.1 Internal

- Philip Neal – Regional O&M Manager

Christopher Moore – O&M Manager

## 2.2 External

For all emergencies please Call 911	
Local Site Emergency Contacts	
<b>Vistra Notifications</b>	<b>Steven Schauwecker – 214-470-2127</b> <b><u>Steven.Schauwecker@luminant.com</u></b>  <b>Wade Johnston – 903-577-5082</b> <b><u>wade.johnston@luminant.comwade</u></b>
<b>Police</b>	432-693-2422
<b>Fire Dept.</b>	432-652-8232
<b>Local Hospital</b>	McCamey Hospital, 2500 Farm to Market 305 McCamey, TX 79752 (432) 652-8626
<b>Nearest Medivac</b>	MCH - 500 W. 4 <sup>th</sup> St. Odessa, TX 79761 (432) 640-6000
<b>Nearest Snake Anti-Venom</b>	MCH - 500 W. 4 <sup>th</sup> St. Odessa, TX 79761 (432) 640-6000

## 2.3 911 System Test

Site personnel are responsible for testing the 911 system via the internal phone system and their CEB issued cell phones. Site personnel should test 911 on an annual basis by dialling from an internal phone system and the CEB issued cell phone, to verify they have reached the appropriate 911 Center and that the 911 system displays the accurate site address or GPS location provided by the cell carrier.

## 3.0 Responsibilities

### 3.1 Roles and Responsibilities

This section defines responsibilities for CEB staff serving five roles as detailed in the paragraphs below. A summary of these roles/responsibilities follows:

**Emergency Action Coordinator (EAC)** – Overall responsibility for emergency response for CEB

---

**Emergency Evacuation Coordinators (EEC)** – Coordinate evacuation for the EAC at each designated area of the office

**Facilities Manager** – Emergency contact for the building's owner

**Agency and Media Coordinator (AMC)** –CEB representative authorized to discuss information on the emergency with the media

**Staff** – Follow the directions contained in this EAP

### 3.2 The Emergency Action Coordinator (EAC)

The **Emergency Action Coordinator** is responsible for:

- Implementing and maintaining this emergency plan;
- Determining where resources are necessary and staff those needs;
- Updating the plan through periodic reviews and annual amendments;
- Ensuring consistency with regulatory changes;
- Serving as the lead during any emergency at the Upton 1 - Texas Solar Plant ConEdison Development facility;
- Coordinating the response to emergencies;
- Ordering evacuation responses as necessary;
- Communicating and coordinating with outside agencies;
- Providing site maps to responding offsite emergency personnel;
- Overseeing a formal incident investigation and emergency response critique within 24 hours of any incident triggering implementation of this EAP;
- Communicating appropriate feedback to staff after the post-incident review has been completed.

A report will be prepared to summarize the results of the formal incident investigation and emergency response critique completed after any incident that requires implementation of this EAP.

This report will be reviewed with the senior management team and staff, with the goal of identifying any opportunities that may enhance CEB's response to future emergencies. A formal report will be completed and made available to all CEB personnel for review.

The report will contain all information required to be submitted to applicable regulatory agencies as required.

#### Emergency Action Coordinator

Primary: Philip Neal

#### Primary Alternate Emergency Action Coordinator

---

Secondary: Chris Moore

### 3.3 Emergency Evacuation Coordinators (EEC)

The **Emergency Evacuation Coordinators** must ensure that any necessary evacuations are conducted safely and employees exit to the designated Muster Point. The EEC's will be notified when an evacuation is required by the EAC, who will also delegate responsibility to the EEC's to ensure employees' orderly departure from the building. Other EEC duties include keeping the EAC informed of the condition of injured personnel and communicating with the Emergency Response representatives as directed by the EAC.

The following employees have been designated as EEC's for the office:

- Philip Neal
- Chris Moore

### 3.4 Agency and Media Coordinator (AMC)

The **Agency and Media Coordinator** will respond to all inquiries from the news media and outside public agencies. Only the AMC or his/her designee is authorized to provide comments on any emergency that may occur at the office, unless another is directed to do so by either the AMC or the alternate AMC.

The AMC will draft press releases and will serve as CEB's communication representative to the media and provide information as deemed appropriate.

#### Agency and Media Coordinator

Primary: David Oravez  
Work:  
Mobile  
Email:

### 3.5 CEB Staff

All **CEB Employees** are responsible for reviewing and complying with the requirements of this EAP and for notifying their supervisor or the EAC of potential hazards not adequately controlled by measures specified in this plan.

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## 4.0 Emergency Alarm System

An emergency alarm system has been installed in the office as an enhancement for personnel safety. The system includes a fire alarm control panel that is monitored by an external company. The control panel monitors three separate systems: a smoke detection system, a heat detection system, and an automatic sprinkler alarm system. Details on each of these systems are provided below:

### 4.1 Smoke and Heat Detection Systems

These systems are based on heat detectors and duct detectors that activate when smoke is sensed. The ventilation ducts are linked to the monitoring system and will shut off the air conditioning. Upon activation, an audible signal will alarm and our outside monitoring agency (a service retained by the office building owner) will automatically be notified to dispatch the fire department.

## 5.0 Procedures

### 5.1 Fire Prevention and Hazards

**In the event that the fire alarm sounds, all employees are required to follow the evacuation procedure as noted below. Do not become a victim by attempting to respond in ways not specifically authorized within this plan, as doing so increases your chances of being hurt.**

If an employee initially discovers fire or smoke in an area of the office, he/she must immediately call the local **Fire Department by dialling 911.**

When notifying the 911 dispatcher, state your name, the nature of the problem and the specific location of the problem. Do not hang up the phone until instructed to do so or if you need to evacuate the area.

**The EAC and EEC's must coordinate the evacuation** of all personnel from the O&M Building. Staff should follow direction from the EAC and EEC's, and leave the area or building via the primary evacuation route from their location if safe to do so. Emergency Evacuation Plans are located throughout the office. It is the responsibility of all employees to become familiar with their primary and secondary evacuation routes. Copies of each area Evacuation Plan are provided as **Attachment 1.**

All evacuations from the office must be down the stairwell which provides egress from the second floor to the ground level. Never attempt to evacuate using the elevators under any circumstance.

After evacuation, all employees must immediately report to the designated evacuation location ("Muster Point") to allow the EEC's to complete accounting of all personnel, including visitors. The designated Muster Point is in the front (south) parking lot of the O&M Building.

The Muster Point Location Plan is included in Attachment 1.

The EEC is responsible for ensuring the accountability of all visitors/contractors

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during an emergency.

Fire extinguishers are located throughout the building. Only trained personnel will use fire extinguishers for use against insipient fires, and not structural fires. The first line of defence is to evacuate the premises and call the local fire department.

## 5.2 Equipment or Vehicle Fires

**In the event that site equipment or vehicles are involved in a fire, employee shall call 911 and notify other site personnel of the incident. Attempts to extinguish fires utilizing appropriate dry chemical or Co2 extinguishers shall be made based on location, size of fire, and other exposed equipment buildings or vehicles. Involved equipment shall be deenergized prior to any attempt at extinguishing a fire.**

## 5.3 Accidents Involving Serious Injury and/or Medical Emergencies

Follow specific instructions and act in a manner that protects your safety and the safety of your co-workers. **Upon notification that a serious accident has occurred, employees are required to dial 911.** Personnel will meet with Emergency Responding units at the road (US HWY 385) and lead the emergency responding units to the plant and inside and then on to the location of the emergency.

When connected to the EMS dispatcher, provide your name, nature of emergency and the location of the emergency. **Do not hang up until instructed to do so by the dispatcher.**

Only trained first responders are allowed into this area where the injured employee is located. All other employees must not interfere with this action and are requested to move away from the area as instructed by the first responder team.

First responders must evaluate the surrounding area of the victim for unsafe conditions, as well as the extent of the injury and whether serious or minor. Once the first response team has assessed the area, decisions must be made to administer CPR, AED, or basic first aid until the EMS arrives.

## 5.4 Emergency Equipment\*\*

- **Automated external defibrillator (AED)** – The AED is located in the office.
- **First Aid Kit** – A first aid kit is located in the mobile equipment and the office. This kit contains all the necessary equipment to address basic first aid responses.
- All employees are required to learn the location of this equipment and participate in the annual CPR/AED training sessions.

*\*\* Emergency equipment is to be used by trained and qualified personnel only.*

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## 5.5 Severe Weather

Severe weather is not frequent in the McCamey area, but it has occurred in the past and is, therefore, discussed in this section of the plan. The most typical occurrence involves: **(High winds, hail, tornadoes, snow, etc.)**.

To address the issue of severe weather, the O&M team monitors the weather daily and makes a decision with the Director of Operations how to handle the day.

In an event a tornado is reported or spotted in the area; an emergency shelter is in place. Location is on the north side O&M building. Please see Attachment B for reference.

## 5.6 Other Emergencies

Other possible, but less likely, emergencies that might impact the PA Solar site include those caused by workplace violence, bomb threats and local emergencies outside the solar park. The following actions should be taken as soon as one of these situations, or any other unforeseen emergency, arises:

- Stay calm and do not panic.
- Call 911 if there is an immediate threat to employee safety.
- Report the incident to the EAC as soon as possible.
- Follow instructions from the EAC or your supervisor.
- If appropriate, evacuate the facility immediately and report to the evacuation muster point.

### 5.5.1 Emergencies involving wildlife

- Snakes – if a rattlesnake is encountered stay clear and contact the EEC. The EEC will make arrangements to have the snake removed from the site. If bitten, call 911 immediately.
- All other wildlife shall be left alone unless directly impacting operations at which point contact the EEC or 911 as appropriate.

## 5.7 Emergency Procedures

- There are two evacuation assembly areas (the "Muster Points") for O&M office employees and visitors of the building, as designated on the Muster Point Location Plan provided in Attachment 2.
- If you hear the alarm system or are instructed to immediately evacuate the building remaining calm, proceed in an orderly fashion using designated exit routes. The evacuation routes are posted throughout the office.
- Remain at the Muster Point until instructed otherwise.

- 
- The EEC's will then complete a sweep of their designated areas to confirm that all personnel and visitors are out of the work area.

## **5.7 Incident Command Structure**

During an emergency, the EAC or designee will assume leadership responsibility for CEB at the incident until relieved by a higher municipal/governmental authority. Please note that governmental Incident Commanders have the right to take over the emergency and utilize CEB resources as necessary. In the situation of fire or personnel injury, it is expected that the local EMS team, as well as the Fire Department, will assume control of the situation once they arrive.

## **5.8 Duties and Responsibilities of Site Personnel**

- Locate and follow specific written emergency instructions.
- Confirm their primary and secondary evacuation routes.
- Contact offsite emergency services at 432-693-2422 (local police).
- Contact the EAC and EEC if time permits.
- Provide basic First Aid/CPR (emergency response team only).

## **5.9 Training**

All employees will be trained on this EAP during their initial orientation process. All personnel will receive a refresher of the evacuation procedure by way of an emergency response drill conducted by the property manager in conjunction with the other tenants of the office park. Additionally, the EAP will be posted on the SharePoint and will be available to all employees.

A critique of this EAP will occur within 24 hours of each time a response to an emergency occurs. Suggested improvements resulting from the critique will be incorporated into this Emergency Action Plan and provided during subsequent refresher trainings.

## **6.0 References**

- 6.1 Code of Federal Regulations 29 CFR 1910.38 Emergency Evacuation Plans
- 6.2 Code of Federal Regulations 29 CFR 1910.157 Portable Fire Extinguishers

## **7.0 Development History**

Writer- Upton Staff

Reviewer- O&M Manager

Approver- Regional Manager

---

Revision 0		Date 06/29/17
Writer	Chris Moore	
Reviewer(s)		
Approver(s)		
Reason Written	Initial procedure development for Emergency Action Plan	

Revision 1		Date 12/20/21
Writer	Chris Moore	
Reviewer(s)	Chris Moore (O&M Manager)	
Approver(s)	Phillip Neal (Regional Manager)	
Reason for Change	Annual Review	

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**Attachment A – O&M Building**  
**Emergency evacuation routes & Grid Coordinates**

**REDACTED MAP**

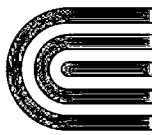
**GRID COORDINATES**

REDACTED

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**Attachment B - Site Muster Points**

REDACTED MAP

<b>EMERGENCY OPERATIONS PLAN</b>		 <b>conEdison</b> Clean Energy Businesses	
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date:04/15/2022

<b>Appendix 2</b>	<b>Alamo 7 Solar Emergency Action Plan</b>
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# ***Alamo VII - Texas Solar Plant***



**conEdison**

Clean Energy Businesses

***109 CR 393***

***Haskell, TX 79521***

## ***Emergency Action Plan***

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## 1.0 Purpose and Scope

The purpose of the Emergency Action Plan (EAP) is to provide Alamo VII - Texas Solar Plant ConEdison Development personnel working at the Haskell County O&M office with immediate actions, requirements, points of contact, and any follow-up actions to be taken in the event of emergencies, including but not limited to the following:

- Fire
- Medical emergencies
- Severe weather
- Other emergencies

Implementation of the EAP, as described herein, will protect life, environment and property during an emergency. This Emergency Action Plan is in compliance with OSHA 29 CFR 1910.38 regulations.

## 2.0 Emergency Contacts

### 2.1 Internal

Philip Neal

REDACTED All Contact  
Information

Craig Stephens

### 2.2 External

Any Emergency	Dial 9-911 for immediate outside assistance for Emergency Management Service (EMS)
Nearest hospital	Stamford, Tx 325-773-2725
Local Police	940-864-2345
Local Fire	940-864-3052
Local hospital	Haskell, Tx 940-864-2621

### 2.3 911 System Testing

Site personnel are responsible for testing the 911 system via the internal phone system and their CEB issued cell phones. Site personnel should test 911 on an annual basis by dialling from an internal phone system and the CEB issued cell phone, to verify they have reached the appropriate 911 Center and that the 911 system displays the accurate site address or GPS location provided by the cell carrier.

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## 3.0 Responsibilities

### 3.1 Roles and Responsibilities

This section defines responsibilities for CEB staff serving the roles as detailed in the paragraphs below. A summary of these roles/responsibilities follows:

**Emergency Action Coordinator (EAC)** – Overall responsibility for emergency response for CEB

**Emergency Evacuation Coordinators (EEC)** – Coordinate evacuation for the EAC at each designated area of the office

**Facilities Manager** – Emergency contact for the building's owner

**Agency and Media Coordinator (AMC)** – CEB representative authorized to discuss information on the emergency with the media

**Staff** – Follow the directions contained in this EAP

### 3.2 The Emergency Action Coordinator (EAC)

The **Emergency Action Coordinator** is responsible for:

- Implementing and maintaining this emergency plan;
- Determining where resources are necessary and staff those needs;
- Updating the plan through periodic reviews and annual amendments;
- Ensuring consistency with regulatory changes;
- Serving as the lead during any emergency at Alamo 7;
- Coordinating the response to emergencies;
- Ordering evacuation responses as necessary;
- Communicating and coordinating with outside agencies;
- Providing site maps to responding offsite emergency personnel;
- Overseeing a formal incident investigation and emergency response critique within 24 hours of any incident triggering implementation of this EAP;
- Communicating appropriate feedback to staff after the post-incident review has been completed.

A report will be prepared to summarize the results of the formal incident investigation and emergency response critique completed after any incident that requires implementation of this EAP.

This report will be reviewed with the senior management team and staff, with the goal of identifying any opportunities that may enhance CEB's response to future emergencies. A formal report will be completed and made available to all CEB personnel for review.

The report will contain all information required to be submitted to applicable

---

regulatory agencies as required.

Emergency Action Coordinator (in this section you need to list the primary and alternative EAC personnel)

Emergency Action Coordinator

Primary: Craig Stephens  
Cell:

Primary Alternate Emergency Action Coordinator

Secondary: Richard Gonzales  
Cell:

### **3.3 Emergency Evacuation Coordinators (EEC)**

The **Emergency Evacuation Coordinators** must ensure that any necessary evacuations are conducted safely and employees exit to the designated Muster Point (see Attachment B). The EEC's will be notified when an evacuation is required by the EAC, who will also delegate responsibility to the EEC's to ensure employees' orderly departure from the building. Other EEC duties include keeping the EAC informed of the condition of injured personnel and communicating with the Emergency Response representatives as directed by the EAC.

The following employee has been designated as EEC for the office: **Craig Stephens**

### **3.4 Agency and Media Coordinator (AMC)**

The **Agency and Media Coordinator** will respond to all inquiries from the news media and outside public agencies. Only the AMC or his/her designee is authorized to provide comments on any emergency that may occur at the office, unless another is directed to do so by either the AMC or the alternate AMC.

The AMC will draft press releases and will serve as CEB's communication representative to the media and provide information as deemed appropriate.

Agency and Media Coordinator

Primary: David Oravez  
Work:  
Mobile  
Email:

### **3.5 CEB Staff**

All **CEB Employees** are responsible for reviewing and complying with the

---

requirements of this EAP and for notifying their supervisor or the EAC of potential hazards not adequately controlled by measures specified in this plan.

## 4.0 Emergency Alarm System

An emergency alarm system has been installed in the office as an enhancement for personnel safety. The system includes a fire alarm control panel that is monitored by an external company. The control panel monitors three separate systems: a smoke detection system, a heat detection system, and an automatic sprinkler alarm system. Details on each of these systems are provided below:

### 4.1 Smoke and Heat Detection Systems

These systems are based on heat detectors and duct detectors that activate when smoke is sensed. The ventilation ducts are linked to the monitoring system and will shut off the air conditioning. Upon activation, an audible signal will alarm and our outside monitoring agency (a service retained by the office building owner) will automatically be notified to dispatch the fire department.

## 5.0 Procedures

### 5.1 Fire

**In the event that the fire alarm sounds, all employees are required to follow the evacuation procedure as noted below. Do not become a victim by attempting to respond in ways not specifically authorized within this plan, as doing so increases your chances of being hurt.**

If an employee initially discovers fire or smoke in an area of the office, he/she must immediately call the local **Fire Department by dialling 911** and provide the following address, **109 CR 393 Haskell, TX 79521**

When notifying the 911 dispatcher, state your name, the nature of the problem and the specific location of the problem. Do not hang up the phone until instructed to do so or if you need to evacuate the area.

**The EAC and EEC's must coordinate the evacuation** of all personnel from the O&M Building. Staff should follow direction from the EAC and EEC's, and leave the area or building via the primary evacuation route from their location if safe to do so. Emergency Evacuation Plans are located throughout the office. It is the responsibility of all employees to become familiar with their primary and secondary evacuation routes. Copies of each area Evacuation Plan are provided as **Attachment 1**.

All evacuations from the office must be down the stairwell which provides egress from the second floor to the ground level. Never attempt to evacuate using the elevators under any circumstance.

After evacuation, all employees must immediately report to the designated evacuation location ("Muster Point") to allow the EEC's to complete accounting

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of all personnel, including visitors. The designated Muster Point is in the front (south) parking lot of the O&M Building.

The Muster Point Location Plan is included in Attachment 1.

The EEC is responsible for ensuring the accountability of all visitors/contractors during an emergency.

Fire extinguishers are located throughout the building. Only trained personnel will use fire extinguishers for use against insipient fires, and not structural fires. The first line of defence is to evacuate the premises and call the local fire department.

## **5.2 Equipment or Vehicle Fires**

**In the event that site equipment or vehicles are involved in a fire, employee shall call 911 and notify other site personnel of the incident. Attempts to extinguish fires utilizing appropriate dry chemical or Co2 extinguishers shall be made based on location, size of fire, and other exposed equipment buildings or vehicles. Involved equipment shall be deenergized prior to any attempt at extinguishing a fire.**

## **5.3 Accidents Involving Serious Injury and/or Medical Emergencies**

Follow specific instructions and act in a manner that protects your safety and the safety of your co-workers. **Upon notification that a serious accident has occurred, employees are required to dial 911.**

When connected to the EMS dispatcher, provide your name, nature of emergency and the location of the emergency. Be specific as to which section of the site the emergency is occurring as there are different addresses. **Do not hang up until instructed to do so by the dispatcher.**

Only trained first responders are allowed into this area where the injured employee is located. Employees trained in emergency first aid shall provide care to the level of their training (i.e., First Aid, CPR/AED, EMT). All other employees will assist at the request of the individual providing care.

First responders must evaluate the surrounding area of the victim for unsafe conditions, as well as the extent of the injury and whether serious or minor. Once the first response team has assessed the area, decisions must be made to administer CPR, AED, or basic first aid until the EMS arrives.

If the scene is unsafe to provide care, evacuate others from the area, maintain a safe distance, update and await first responders.

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## 5.4 Emergency Equipment

- **Automated external defibrillator (AED)** – The AED is located in con-Edison Development vehicles and in the temporary O&M office.
- **First Aid Kit** – A first aid kit is located in the temporary O&M office. This kit contains the equipment to address basic first aid responses.
- **Emergency eye wash**- Located in temporary O&M office.
- **Blood Borne pathogen spill kit**- Located in the temporary O&M office.
- All employees are required to learn the location of this equipment and participate in the annual CPR/AED and first aid training sessions.

*\*\* Emergency equipment is to be used by trained and qualified personnel only.*

## 5.5 Severe Weather

Severe weather is frequent in the Haskell area, but it has occurred in the past and is, therefore, discussed in this section of the plan. The most typical occurrence involves: **(High winds, hail, tornadoes, snow, etc)**.

To address the issue of severe weather, the Operations team will evaluate the situation and then provide an all employees email early in the morning of the effected day.

In the remote instance that severe weather occurs during the work day, the EAC and Operations will determine actions to take to address the issue.

## 5.6 Other Emergencies

Other possible, but less likely, emergencies that might impact the Alamo 7 Solar site include those caused by workplace violence, bomb threats and local emergencies outside the site. The following actions should be taken as soon as one of these situations, or any other unforeseen emergency, arises:

- Stay calm and do not panic.
- Call 911 if there is an immediate threat to employee safety.
- Report the incident to the EAC as soon as possible.
- Follow instructions from the EAC or your supervisor.
- If appropriate, evacuate the facility immediately and report to the evacuation muster point.

## 5.7 Emergency Procedures

- There is one evacuation assembly area (the "Muster Point") for O&M office for employees and visitors of the building, as designated on the Muster Point Location Plan provided in Attachment 2.

- 
- If you hear the alarm system or are instructed to immediately evacuate the building remaining calm, proceed in an orderly fashion using designated exit routes. The evacuation routes are posted throughout the office.
  - Remain at the Muster Point until instructed otherwise.
  - The EEC's will then complete a sweep of their designated areas to confirm that all personnel and visitors are out of the work area.

#### **5.6.1 Emergencies involving wildlife**

- All incidents involving wildlife shall be reported to EH&S utilizing Incident Reporting Matrix (Attachment B).
- Affected wildlife shall be left alone unless directly impacting operations at which point contact the EEC or 911 as appropriate, requesting trained Animal Control Personnel.

#### **5.6.2 Emergencies involving hazardous materials spills or releases**

**Site personnel shall utilize Water Strider SPCC Plan when managing releases or spills of potentially hazardous materials.**

- All incidents involving hazardous materials shall be reported to EH&S utilizing Incident Reporting Matrix (Attachment B).
- Initial response should include damming, diking, diverting, and absorption of hazardous materials by trained personnel.
- Any incident that is larger than what can be managed by on site resources will require contacting 911 and requesting the local Fire Department. Callers should ensure that they provided type, quantity and source of the release to the 911 dispatcher.
- Site personnel should remain in the area, at a safe distance from the release, to direct emergency personnel to the location of the release or spill.

### **5.7 Evacuation Procedures**

- During in an event of an emergency at Alamo 7 Solar, office employees and visitors shall exit the site to the appropriate muster point, where site personnel shall an accountability of staff and visitors. Muster Point Locations are outlined in Attachment A.
- If you hear the alarm system or are instructed to immediately evacuate the building, remain calm and proceed in an orderly fashion using designated exit routes.
- Remain at the Muster Point until instructed otherwise.
- The EEC's will then complete a sweep of their designated areas to confirm that all personnel and visitors are out of the work area.

### **5.8 Incident Command Structure**

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During an emergency, the EAC or designee will assume leadership responsibility for CEB at the incident until relieved by a higher municipal/governmental authority. Please note that governmental Incident Commanders have the right to take over the emergency and utilize CEB resources as necessary. In the situation of fire or personnel injury, it is expected that the local EMS team, as well as the Fire Department, will assume control of the situation once they arrive.

## **5.9 Duties and Responsibilities of Site Personnel during an Emergency**

- Locate and follow specific written emergency instructions.
- Confirm their primary and secondary evacuation routes.
- Contact offsite emergency services at 911.
- Contact the EAC and EEC if time permits.
- Provide basic First Aid/CPR (emergency response team only).

## **5.10 Training**

All employees will be trained on this EAP during their initial orientation process. All personnel will receive a refresher of the evacuation procedure by way of an emergency response drill conducted by the Site Manager. Additionally, the EAP will be posted on the SharePoint and will be available to all employees in hard copy.

A critique of this EAP will occur within 24 hours of each time a response to an emergency occurs. Suggested improvements resulting from the critique will be incorporated into this Emergency Action Plan and provided during subsequent refresher trainings.

## **6.0 References**

- 6.1** Code of Federal Regulations 29 CFR 1910.38 Emergency Evacuation Plans
- 6.2** Code of Federal Regulations 29 CFR 1910.157 Portable Fire Extinguishers

## **7.0 Development History**

<b>Revision 0 Date 06/29/17</b>	
Writer	O& M Manager
Reviewer(s)	
Approver(s)	
Reason Written	Initial procedure development for Emergency Action Plan

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Revision 1		Date 12/20/21
Writer		
Reviewer(s)	(O&M Manager)	
Approver(s)	Phillip Neal (Regional Manager)	
Reason for Change	Annual Review	

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**ATTACHMENT 1-EVACUATION ROUTES, MUSTER POINT AND GRID  
COORDINATES**

**REDACTED MAP**

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**Grid Coordinates**

33°0'20.33"N 99°36'20.85"W

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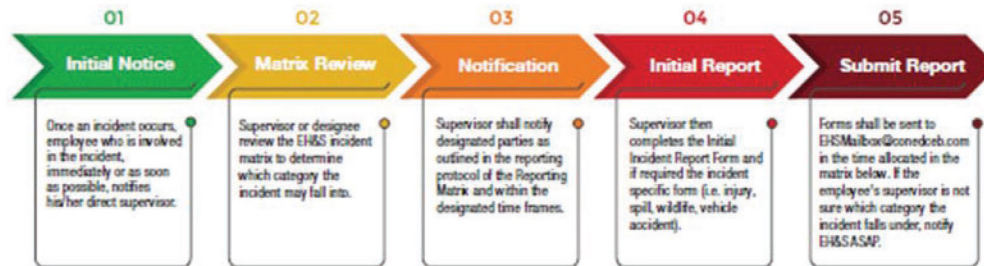
**ATTACHMENT 2-INCIDENT REPORTING MATRIX**

ATTACHMENT 2 INCIDENT REPORTING MATRIX



# Incident Reporting Matrix

## 5 Important Steps You Must Follow:



## Contact Info:



EH&S Manager  
David Raines  
[RainesD@conedceb.com](mailto:RainesD@conedceb.com)  
914-993-2177



Manager,  
Environmental Programs  
John Oldi  
[OldiJ@conedceb.com](mailto:OldiJ@conedceb.com)  
914-993-2187




Director,  
Human Resources & Communications  
David Oravez  
[OravezD@conedceb.com](mailto:OravezD@conedceb.com)  
914-286-4510

## Reporting Matrix:

Level	Health & Safety Incident	Environmental Incident	Reporting Protocol
1	Unsafe Condition, Near Miss, Unsafe Act	<ul style="list-style-type: none"><li>Release within containment facilities onsite</li><li>Registered complaint from an external stakeholder regarding facility operations.</li></ul>	<ul style="list-style-type: none"><li>Site team to notify Regional Manager</li><li>Site team to submit report provide notification within <b>24 hours</b> to EH&amp;S Team. Utilize Incident Reporting Form and send to <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li><li>EH&amp;S Team to notify Director of affected Line of Business (LOB)</li></ul>
2	First Aid, Motor Vehicle Collision (MVC) with no injuries or damage to CEB Property or Equipment	<ul style="list-style-type: none"><li>Reportable Environmental Incident (REI): a release to air, water or soil that requires reporting to a government agency.</li><li>Wildlife Mortality, Injury or "Take"</li></ul>	<ul style="list-style-type: none"><li>Site team to notify Regional Manager and EH&amp;S via call, text, or email as soon as practical</li><li>Site team to submit report within <b>8 hours</b> to EH&amp;S Team. Utilize Incident Reporting Form and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li><li>EH&amp;S team to notify CEO and director of affected LOB via call or text</li></ul>
3	Medical Treatment Restricted Work, MVC with Injuries, Health and Safety Regulatory Action – an action by OSHA or other regulatory agency. Contagious disease/virus infection or potential infection	<ul style="list-style-type: none"><li>Environmental Regulatory Action (ERA) – an action taken by a government agency in response to an environmental event or incident</li></ul>	<ul style="list-style-type: none"><li>Site team to notify Regional Manager and EH&amp;S via call, text, or email as soon as practical</li><li>Site team to submit report form within <b>8 hours</b> or before end of shift to EH&amp;S and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li><li>EH&amp;S team to notify CEO, Director of affected LOB, Director of Operations, HR and COO via call or text</li></ul>
4	Serious injury or Lost Time Incident	<ul style="list-style-type: none"><li>Release offsite with major environmental impacts or Permit violation/ Environmental Regulatory Action (ERA) resulting in temporary or permanent prohibition of any key</li></ul>	<ul style="list-style-type: none"><li>Site team to notify Regional manager and EH&amp;S via call, text, or email immediately</li><li>Site team to submit report to EH&amp;S Team within <b>4 hours</b>. Utilize Incident Reporting Form and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li><li>EH&amp;S team to notify CEO, Director of affected LOB, Director of Operations, HR and COO via call or text</li></ul>
5	Fatality or Catastrophic incident	<ul style="list-style-type: none"><li>Release offsite with catastrophic environmental impacts or Permit violation/ Environmental Regulatory Action (ERA), resulting in temporary or permanent shutdown of generating capacity</li></ul>	<ul style="list-style-type: none"><li>Site team to notify Regional Manager via telephone immediately</li><li>Regional Manager to notify EH&amp;S via telephone immediately</li><li>EH&amp;S to notify: CEB Crisis Management Team (CMT: Mark Noyes, Jim Dixon, Lorena Tzavarlos, Paul Mapelli) <b>IMMEDIATELY VIA TELEPHONE</b></li><li>COO/CEO Reports to CEB Board of Directors <b>as soon as possible</b></li></ul>

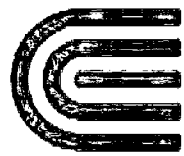
\*Wildlife "Take" - For protected species, to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. This could also include impacts to or loss of habitat associated with protected species.

<b>EMERGENCY OPERATIONS PLAN</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>	Substantive Rule §25.53
Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date:04/15/2022

<h1>Appendix 3</h1>	<h1>Alamo 3,4,5 Solar Emergency Action Plan</h1>
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# ***Alamo VII - Texas Solar Plant***



**conEdison**

Clean Energy Businesses

***109 CR 393***

***Haskell, TX 79521***

## ***Emergency Action Plan***

4/15/2022

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## 1.0 Purpose and Scope

The purpose of the Emergency Action Plan (EAP) is to provide Alamo VII - Texas Solar Plant ConEdison Development personnel working at the Haskell County O&M office with immediate actions, requirements, points of contact, and any follow-up actions to be taken in the event of emergencies, including but not limited to the following:

- Fire
- Medical emergencies
- Severe weather
- Other emergencies

Implementation of the EAP, as described herein, will protect life, environment and property during an emergency. This Emergency Action Plan is in compliance with OSHA 29 CFR 1910.38 regulations.

## 2.0 Emergency Contacts

### 2.1 Internal

Philip Neal

REDACTED CONTACT  
INFORMATION

Alec Jones

## 2.2 External

Service	Provider	Emergency Contact No.
<b>External:</b>		
Medical Service (Non-Emergency)	UMC #2 202 James ST. Brackettville, TX 78832	(830) 563-2434
Medical Services (Emergency)	Val Verde Regional Hospital 801 North Bedell Ave Del Rio, TX 78840	(830) 775-8566
Ambulance Service	Kinney County Ems Medical Emergency 401 south Ellen street Brackettville, TX 78832	911 or (830) 563-9090
Fire	Brackettville Fire Department	911 or (830) 563-3199
Police	Brackettville County Sherriff	911 or (830) 563-2788
Alcohol & Drug Screening	Texas Alcohol and Drug Testing Services 2420 E Main St Uvalde, Texas 78801	(830) 278-5800
Weather	Weather Bug	<a href="http://weather.weatherbug.com/">http://weather.weatherbug.com/</a>
Weather	Local	<a href="http://www.acuweather.com">http://www.acuweather.com</a>
Utility – Power	STEC	(361) 485-6300
Poison Control	Poison Control Center	(800) 222-1222
Road Conditions	Local Conditions – Brackettville	<a href="http://Localconditions.com">Localconditions.com</a>

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## 2.3 911 System Testing

Site personnel are responsible for testing the 911 system via the internal phone system and their CEB issued cell phones. Site personnel should test 911 on an annual basis by dialling from an internal phone system and the CEB issued cell phone, to verify they have reached the appropriate 911 Center and that the 911 system displays the accurate site address or GPS location provided by the cell carrier.

## 3.0 Responsibilities

### 3.1 Roles and Responsibilities

This section defines responsibilities for CEB staff serving the roles as detailed in the paragraphs below. A summary of these roles/responsibilities follows:

**Emergency Action Coordinator (EAC)** – Overall responsibility for emergency response for CEB

**Emergency Evacuation Coordinators (EEC)** – Coordinate evacuation for the EAC at each designated area of the office

**Facilities Manager** – Emergency contact for the building's owner

**Agency and Media Coordinator (AMC)** – CEB representative authorized to discuss information on the emergency with the media

**Staff** – Follow the directions contained in this EAP

### 3.2 The Emergency Action Coordinator (EAC)

The **Emergency Action Coordinator** is responsible for:

- Implementing and maintaining this emergency plan;
- Determining where resources are necessary and staff those needs;
- Updating the plan through periodic reviews and annual amendments;
- Ensuring consistency with regulatory changes;
- Serving as the lead during any emergency at Alamo 7;
- Coordinating the response to emergencies;
- Ordering evacuation responses as necessary;
- Communicating and coordinating with outside agencies;
- Providing site maps to responding offsite emergency personnel;
- Overseeing a formal incident investigation and emergency response critique within 24 hours of any incident triggering implementation of this EAP;
- Communicating appropriate feedback to staff after the post-incident review has been completed.

A report will be prepared to summarize the results of the formal incident investigation and emergency response critique completed after any incident that requires implementation of this EAP.

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This report will be reviewed with the senior management team and staff, with the goal of identifying any opportunities that may enhance CEB's response to future emergencies. A formal report will be completed and made available to all CEB personnel for review.

The report will contain all information required to be submitted to applicable regulatory agencies as required.

Emergency Action Coordinator (in this section you need to list the primary and alternative EAC personnel)

Emergency Action Coordinator

Primary: Alec Jones  
Cell:

Primary Alternate Emergency Action Coordinator

Secondary: Richard Gonzales  
Cell:

### 3.3 Emergency Evacuation Coordinators (EEC)

The **Emergency Evacuation Coordinators** must ensure that any necessary evacuations are conducted safely and employees exit to the designated Muster Point (see Attachment B). The EEC's will be notified when an evacuation is required by the EAC, who will also delegate responsibility to the EEC's to ensure employees' orderly departure from the building. Other EEC duties include keeping the EAC informed of the condition of injured personnel and communicating with the Emergency Response representatives as directed by the EAC.

The following employee has been designated as EEC for the office: **Alec Jones**

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The **Agency and Media Coordinator** will respond to all inquiries from the news media and outside public agencies. Only the AMC or his/her designee is authorized to provide comments on any emergency that may occur at the office, unless another is directed to do so by either the AMC or the alternate AMC.

The AMC will draft press releases and will serve as CEB's communication representative to the media and provide information as deemed appropriate.

Agency and Media Coordinator

Primary: David Oravez  
Work:  
Mobile  
Email:

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An emergency alarm system has been installed in the office as an enhancement for personnel safety. The system includes a fire alarm control panel that is monitored by an external company. The control panel monitors three separate systems: a smoke detection system, a heat detection system, and an automatic sprinkler alarm system. Details on each of these systems are provided below:

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- Report the incident to the EAC as soon as possible.
- Follow instructions from the EAC or your supervisor.
- If appropriate, evacuate the facility immediately and report to the evacuation muster point.

### 5.6 Emergency Procedures

- There is one evacuation assembly area (the "Muster Point") for O&M office for employees and visitors of the building, as designated on the Muster Point Location Plan provided in Attachment 2.
- If you hear the alarm system or are instructed to immediately evacuate the building remaining calm, proceed in an orderly fashion using designated exit routes. The evacuation routes are posted throughout the office.
- Remain at the Muster Point until instructed otherwise.
- The EEC's will then complete a sweep of their designated areas to confirm

---

that all personnel and visitors are out of the work area.

#### **5.6.1 Emergencies involving wildlife**

- All incidents involving wildlife shall be reported to EH&S utilizing Incident Reporting Matrix (Attachment B).
- Affected wildlife shall be left alone unless directly impacting operations at which point contact the EEC or 911 as appropriate, requesting trained Animal Control Personnel.

#### **5.6.2 Emergencies involving hazardous materials spills or releases**

**Site personnel shall utilize Alamo 3,4,5SPCC Plan when managing releases or spills of potentially hazardous materials.**

- All incidents involving hazardous materials shall be reported to EH&S utilizing Incident Reporting Matrix (Attachment B).
- Initial response should include damming, diking, diverting, and absorption of hazardous materials by trained personnel.
- Any incident that is larger than what can be managed by on site resources will require contacting 911 and requesting the local Fire Department. Callers should ensure that they provided type, amount and source of the release to the 911 dispatcher.
- Site personnel should remain in the area, at a safe distance from the release, to direct emergency personnel to the location of the release or spill.

### **5.7 Evacuation Procedures**

- During in an event of an emergency at Alamo 3,4,5 Solar, office employees and visitors shall exit the site to the appropriate muster point, where site personnel shall an accountability of staff and visitors. Muster Point Locations are outlined in Attachment A.
- If you hear the alarm system or are instructed to immediately evacuate the building, remain calm and proceed in an orderly fashion using designated exit routes.
- Remain at the Muster Point until instructed otherwise.
- The EEC's will then complete a sweep of their designated areas to confirm that all personnel and visitors are out of the work area.

### **5.8 Incident Command Structure**

During an emergency, the EAC or designee will assume leadership responsibility for CEB at the incident until relieved by a higher municipal/governmental authority. Please note that governmental Incident Commanders have the right to take over the emergency and utilize CEB resources as necessary. In the situation of fire or personnel injury, it is expected that the local EMS team, as well as the Fire Department, will assume control of the situation once they arrive.

## 5.9 Duties and Responsibilities of Site Personnel during an Emergency

- Locate and follow specific written emergency instructions.
- Confirm their primary and secondary evacuation routes.
- Contact offsite emergency services at 911.
- Contact the EAC and EEC if time permits.
- Provide basic First Aid/CPR (emergency response team only).

## 5.10 Training

All employees will be trained on this EAP during their initial orientation process. All personnel will receive a refresher of the evacuation procedure by way of an emergency response drill conducted by the Site Manager. Additionally, the EAP will be posted on the SharePoint and will be available to all employees in hard copy.

A critique of this EAP will occur within 24 hours of each time a response to an emergency occurs. Suggested improvements resulting from the critique will be incorporated into this Emergency Action Plan and provided during subsequent refresher trainings.

## 6.0 References

- 6.1 Code of Federal Regulations 29 CFR 1910.38 Emergency Evacuation Plans
- 6.2 Code of Federal Regulations 29 CFR 1910.157 Portable Fire Extinguishers

## 7.0 Development History

Revision 0		Date 06/29/17
Writer	O&M Manager	
Reviewer(s)		
Approver(s)		
Reason Written	Initial procedure development for Emergency Action Plan	

Revision 1		Date 12/20/21
Writer		
Reviewer(s)	Alec Jones	
Approver(s)	Phillip Neal (Regional Manager)	
Reason for Change	Annual Review	

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ATTACHMENT 1-EVACUATION ROUTES, MUSTER POINT AND GRID  
COORDINATES

REDACTED MAP

**Grid Coordinates** 33°0'20.33"N 99°36'20.85"W

## ATTACHMENT 2-INCIDENT REPORTING MATRIX

### ATTACHMENT 2 INCIDENT REPORTING MATRIX



# Incident Reporting Matrix

### 5 Important Steps You Must Follow:

01

**Initial Notice**

Once an incident occurs, employee who is involved in the incident, immediately or as soon as possible, notifies his/her direct supervisor.

02

**Matrix Review**

Supervisor or designee review the EH&S incident matrix to determine which category the incident may fall into.

03

**Notification**

Supervisor shall notify designated parties as outlined in the reporting protocol of the Reporting Matrix and within the designated time frames.

04

**Initial Report**


Supervisor then completes the Initial Incident Report Form and if required the incident specific form (i.e. injury, spill, wildlife, vehicle accident).

05


**Submit Report**

Forms shall be sent to EHSMailbox@conedceb.com in the time allocated in the matrix below. If the employee's supervisor is not sure which category the incident falls under, notify EH&S ASAP.


### Contact Info:



EH&S Manager  
David Raines  
[RainesD@conedceb.com](mailto:RainesD@conedceb.com)  
914-993-2177



Manager,  
Environmental Programs  
John Oldi  
[OldiJ@conedceb.com](mailto:OldiJ@conedceb.com)  
914-993-2187

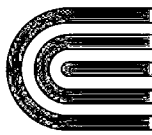


Director,  
Human Resources & Communications  
David Oravez  
[OravezD@conedceb.com](mailto:OravezD@conedceb.com)  
914-286-4510

### Reporting Matrix:

Level	Health & Safety Incident	Environmental Incident	Reporting Protocol
1	Unsafe Condition, Near Miss, Unsafe Act	<ul style="list-style-type: none"> <li>Release within containment facilities onsite</li> <li>Registered complaint from an external stakeholder regarding facility operations.</li> </ul>	<ul style="list-style-type: none"> <li>Site team to notify Regional Manager</li> <li>Site team to submit report provide notification within <b>24 hours</b> to EH&amp;S Team. Utilize Incident Reporting Form and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li> <li>EH&amp;S Team to notify Director of affected Line of Business (LOB)</li> </ul>
2	First Aid, Motor Vehicle Collision (MVC) with no injuries or damage to CEB Property or Equipment	<ul style="list-style-type: none"> <li>Reportable Environmental Incident (REI): a release to air, water or soil that requires reporting to a government agency.</li> <li>Wildlife Mortality, Injury or "Take"</li> </ul>	<ul style="list-style-type: none"> <li>Site team to notify Regional Manager and EH&amp;S via call, text, or email as soon as practical</li> <li>Site team to submit report within <b>8 hours</b> to EH&amp;S Team. Utilize Incident Reporting Form and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li> <li>EH&amp;S team to notify CEO and director of affected LOB via call or text</li> </ul>
3	Medical Treatment Restricted Work, MVC with Injuries, Health and Safety Regulatory Action – an action by OSHA or other regulatory agency, Contagious disease/virus infection or potential infection	<ul style="list-style-type: none"> <li>Environmental Regulatory Action (ERA) – an action taken by a government agency in response to an environmental event or incident</li> </ul>	<ul style="list-style-type: none"> <li>Site team to notify Regional Manager and EH&amp;S via call, text, or email as soon as practical</li> <li>Site team to submit report form within <b>8 hours</b> or before end of shift to EH&amp;S and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li> <li>EH&amp;S team to notify CEO, Director of affected LOB, Director of Operations, HR and COO via call or text</li> </ul>
4	Serious Injury or Lost Time Incident	<ul style="list-style-type: none"> <li>Release offsite with major environmental impacts or Permit violation/ Environmental Regulatory Action (ERA) resulting in temporary or permanent prohibition of any key</li> </ul>	<ul style="list-style-type: none"> <li>Site team to notify Regional manager and EH&amp;S via call, text, or email immediately</li> <li>Site team to submit report to EH&amp;S Team within <b>4 hours</b>. Utilize Incident Reporting Form and send to: <a href="mailto:EHSMailbox@conedceb.com">EHSMailbox@conedceb.com</a></li> <li>EH&amp;S team to notify CEO, Director of affected LOB, Director of Operations, HR and COO via call or text</li> </ul>
5	Fatality or Catastrophic incident	<ul style="list-style-type: none"> <li>Release offsite with catastrophic environmental impacts or Permit violation/ Environmental Regulatory Action (ERA), resulting in temporary or permanent shutdown of generating capacity</li> </ul>	<ul style="list-style-type: none"> <li>Site team to notify Regional Manager via telephone immediately</li> <li>Regional Manager to notify EH&amp;S via telephone immediately</li> <li>EH&amp;S to notify: CEB Crisis Management Team (CMT: Mark Noyes, Jim Dixon, Lorena Tavarinos, Paul Mapelli) <b>IMMEDIATELY VIA TELEPHONE</b></li> <li>COO/CEO Reports to CEB Board of Directors as soon as possible</li> </ul>

\*Wildlife "take" - For protected species, to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. This could also include impacts to or loss of habitat associated with protected species.

EMERGENCY OPERATIONS PLAN		 <b>conEdison</b> Clean Energy Businesses	
TEXAS PUCT ELECTRIC SERVICE EOP			
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Version No.: 1	Version Date: 04/15/2022	Review Cycle: As Needed	Effective Date:04/15/2022

# Appendix 4

# CEB Cold Weather Planning Plan




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INTERNAL NERC PROCEDURE # PUCT-1

SUBJECT

Texas PUCT Special Process – Cold Weather Planning

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## 1.0 PURPOSE

To ensure Con Ed CEB is prepared for cold weather, to the extent possible, following actions by the PUCT and ERCOT resulting from recent (2011 and 2021) extreme cold weather events.

On October 21, 2021, the Public Utility Commission-Texas (PUCT) ruled that the “highest ranking” executives of generation and transmission companies attest to their actions and readiness for the upcoming winter, including addressing any issues observed on the system in the prior winter. Referenced in the discussion was a Quanta Technology report,<sup>1</sup> with recommendations following a 2011 winter storm in Texas, which has now been accepted.

## 2.0 APPLICATION

This applies to the Con Edison Clean Energy Businesses, Inc. (CEB) O&M managers and personnel directly supporting Bulk Electric System (BES) Solar facilities within the Texas Interconnection and may involve engineering, third parties, or other supporting groups. The application of this specific procedure is limited to the following photovoltaic Solar sites:

- Texas Solar 3 -Alamo 3
- Texas Solar 4 -Alamo 4
- Texas Solar 5 -Alamo 5
- Texas Solar 7- Alamo 7
- Upton County Solar

## 3.0 GENERAL

This Procedure shall serve as the CEB’s BES Texas Site Cold Weather reference documentation.

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<sup>1</sup> [http://interchange.puc.texas.gov/Documents/39646\\_10\\_738020.PDF](http://interchange.puc.texas.gov/Documents/39646_10_738020.PDF)

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## 4.0 PROCEDURE

Con Ed CEB is committed to following industry practices and regulations that support reliability in all jurisdictions in which we do business.

### 4.1 Risk Assessment

4.1.1 There are no thermal components at any of the facilities susceptible to freezing such as in water/steam generation, nor are any of the sites exposed to fuel curtailments such as natural gas, coal, or other sites reliant on fuel deliveries. All CEB sites referenced in Section 2.0 are inverter based photovoltaic solar facilities.

4.1.2 Not unlike all electric facilities, there is some risk during extreme cold; however, the definition of extreme is always subject to interpretation. Some risk identified for CEB Solar sites in Texas with respect to the ability to supply power in cold weather include:

4.1.2.1 Snow accumulation on panels (partial control).

4.1.2.2 Cloud cover (not under CEB control).

4.1.2.3 Loss of Grid or lines (not under CEB control).

4.1.2.4 Loss of lead line or substation equipment (partial control with proper maintenance practices).

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- 4.1.2.5 Exceeding design temperature limitations (typically limited by process control setpoints.).
- 4.1.2.6 Panel tracking system failure during extreme weather (partial control with proper maintenance practices).
- 4.1.2.7 Moisture and/or condensation in measurement equipment (partial control with proper maintenance practices).

## 4.2 Process

4.2.1 Each fall, prior to November 30, and concurrent with normal inspections, each site will schedule a cold weather preparation walkdown that will include:

4.2.1.1 CEB owned solar interconnection substation and lead line equipment visual inspections and checks to verify preventative maintenance practices, such as but not limited to:

- 4.2.1.1.1 Verify buildings or enclosures that house electronics, batteries, and/or relays are in winter readiness condition.
- 4.2.1.1.2 Verify availability of heaters or remedial heating equipment operation, such as propane heaters and propane or other fuel back up or emergency generation.
- 4.2.1.1.3 Verify breakers, switches, transformers, and other substation equipment are in winter readiness condition, including cabinet seals with emphasis on prevention of moisture ingress during freeze thaw cycles.
- 4.2.1.1.4 Verify that tracking mechanisms are checked for proper operation and are ready for cold weather operations, including proper oil viscosity, and where appropriate, optionally perform motor current checks.

4.2.1.1.4.1 Where possible, increase focus on contamination issues based on the environment of the site.

4.2.2 Procedural activities: Prior to November 30 of each year each site will:

4.2.2.1 Verify to the extent possible roads are prepared for winter operations to allow ingress and egress to response personnel.

4.2.2.1.1 Sites may verify availability of 4 wheel drive vehicles for access.

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Note: Snow or ice removal from photovoltaic panels is not performed manually.

4.2.2.1.2 If it is necessary, the tracking systems can be adjusted in a manner to facilitate snow melting or removal, such as maximum angle stow or similar positioning to allow rapid melting as the sun hits the panels.

#### 4.2.3 Documentation

4.2.3.1 Each site will self-attest to the successful completion of the walkdown and retain documentation of such in site records. The attestations will be supplied to the CEB Compliance Department.

4.2.3.2 Each site will document training participation and supply that information to the CEB Compliance Department.

#### 4.3 Training

4.3.1 Each fall, prior to winter, each site will verify if new employees require training on this procedure and will document the training date and attendees in the annual assessment.

4.3.2 As noted in Section 4.2.2, each site will document training participation and supply that information to the CEB compliance department.

#### 5.0 REFERENCES

Reliability Standard	Requirement
<b>PUCT Order</b>	

#### 6.0 ATTACHMENTS & APPENDICES

6.1 Internal NERC Procedure # PUCT-1A – Cold Weather Planning Checklist & Attestation

#### 7.0 PROCEDURES REVIEW

##### 7.1 Review Frequency

This procedure shall be reviewed as follows:

Frequency	Specifics
<b>Annually</b>	
<b>Quarterly</b>	
<b>As-needed</b>	Based on any changes to PUCT weather orders.

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<b>Other</b>	-
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## 8.0 SIGNOFFS

The following personnel are required to read this procedure and the associated checklist and to ensure their execution.

Name & Title	Signature	Date
John Bahrs – Managing Director, Operations	DocuSigned by: <i>John Bahrs</i> DocuSigned by: 116C552D6E6F4C6...	11/30/2021
Tom Ruggiero - Director, Engineering	DocuSigned by: <i>Tom Ruggiero</i> 116C552D6E6F4C6...	11/30/2021
Philip Neal – Regional Manager, South	DocuSigned by: <i>Philip Neal</i> 6B1C6D6868364E2...	11/30/2021

## 9.0 PROCEDURES RESPONSIBILITY

The Manager of the Compliance Department will provide advice and counsel on this procedure and is responsible for reviewing this procedure in accordance with section 7.0.

Version	Date	Description of Change	Edits By
Original (V1)	11/17/2021	Original Document (V1) and associated Appendix to formally document prior site level ad hoc processes regarding cold weather preparation.	Shanon Amonette

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INTERNAL NERC PROCEDURE # PUCT-1A

SUBJECT

Texas PUCT Special Process – Cold Weather Planning Checklist &amp; Attestation

## 1.0 INSTRUCTIONS

This Checklist is to be used in conjunction with the Internal NERC Procedure # PUCT-1 - Texas PUCT Special Process – Cold Weather Planning. Please review the procedure prior to completion of this Checklist.

Complete each item listed below. Space has been provided for any additional items that are completed. Provide comments if needed.

COLD WEATHER PLANNING CHECKLIST & ATTESTATION		
SITE NAME	Choose a Site Name.	COMMENTS
<b>Inspection/Walkdown:</b> CEB owned solar interconnection substation and lead line equipment visual inspections and checks to verify preventative maintenance practices.		
Completed <input type="checkbox"/>	Verify buildings or enclosures that house electronics, batteries, and/or relays are in winter readiness condition.	
Completed <input type="checkbox"/>	Verify availability of heaters or remedial heating equipment operation, such as propane heaters and propane.	
Completed <input type="checkbox"/>	Verify breakers, switches, transformers, and other substation equipment are in winter readiness condition, including cabinet seals with emphasis on prevention of moisture ingress during freeze thaw cycles.	
Completed <input type="checkbox"/>	Verify that tracking mechanisms are checked for proper operation and are ready for cold weather operations, including proper oil viscosity, and where appropriate, optionally perform motor current checks. (Where possible increase focus on contamination issues based on the environment of the site.)	
Completed <input type="checkbox"/>		

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Completed <input type="checkbox"/>		
Completed <input type="checkbox"/>		
<b>Roads</b>		
Completed <input type="checkbox"/>	Verify to the extent possible roads are prepared for winter operations to allow ingress and egress to response personnel.	
Completed <input type="checkbox"/>	If applicable, verify availability of four-wheel drive vehicles for access.	
Completed <input type="checkbox"/>		
<b>Training</b>		
Completed <input type="checkbox"/>	Verify if new employees require training on the Cold Weather Planning procedure and document the training date and attendees in the annual assessment.	
Completed <input type="checkbox"/>	Provide documented training participation to the CEB compliance department.	
Completed <input type="checkbox"/>		
<b>Attestation</b>		
The individual(s) listed below have signed this Checklist and attest to the successful completion of the items listed above. A copy of this Checklist & Attestation shall be sent to the CEB compliance department, as well as retained by each site.		
Completed <input type="checkbox"/>	Provide a copy of this Checklist & Attestation to the CEB compliance department.	
<b>Completed &amp; Attested By</b>	<b>Name (Please Print):</b> <b>Signature:</b>	<b>Date: Click or tap to enter a date.</b>
	<b>Name (Please Print):</b> <b>Signature:</b>	<b>Date: Click or tap to enter a date.</b>

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CEB- TX EMERGENCY OPERATIONS PLAN ANNEX A-H			
TEXAS PUCT ELECTRIC SERVICE EOP			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b> <b>Annex 1</b>	Substantive Rule §25.53
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# ANNEX A- ANNEX H

**Applicable to all CEB Texas photovoltaic Solar Sites Listed Below:**

Upton County Solar (SPTX12B\_RN)  
Texas Solar 3 -Alamo 3  
Texas Solar 4 -Alamo 4 (Eclipse- Unit 1)  
Texas Solar 5 -Alamo 5 (Helios)  
Texas Solar 7- Alamo 7 (Solara- Unit 1)


<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
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## ANNEX A- Weather Emergency Annex

PUC REQUIREMENT: Section 25.53 (e)(2)(A) - Weather Emergency Annex

Cold Weather Planning Plan Attached to EOP as Appendix 4.


For hot weather, the Site Manager will ensure ERCOT has not issued any system alerts that would affect normal site activities.

<b>CEB- TX EMERGENCY OPERATIONS PLAN</b> <b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
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## ANNEX B

PUC REQUIREMENT: Section 25.53 (e)(2)(B) - Water Shortage Annex- N/A

N/A- Water is not used to generate electricity as the site.


<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
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## ANNEX C

PUC REQUIREMENT: Section 25.53 (e)(2)(C) - Restoration of Service Annex

Electrical system emergencies at the site and connected transmission systems may take many different forms and it would be impossible to define all system emergencies that could occur. The Site Manager shall take all appropriate actions in coordination with the Transmission Operator, QSE, Transmission Planner, to evaluate system conditions, maintain or re-establish normal operations. Facility to follow NERC Procedures if applicable.

After the Systems Emergency has cleared and it is safe to return to the site, Facility to return to normal operations. Facility will document any abnormal conditions found upon return to site or during the event.


<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>  <b>Annex 1</b>	Substantive Rule §25.53
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## ANNEX D

### PUC REQUIREMENT: Section 25.53 (e)(2)(D) - Pandemic and Epidemic Response

A plant pandemic event is an epidemic or outbreak of infectious disease during which a substantial number or all of the facility O&M personnel may not be available to maintain continued site presence to support plant operations. As a result, Operations Management may, depending upon the situation, utilize any one or combinations of the following options below to attempt to ensure continuous and adequate service of the facility.


1. Facility Management will utilize remote computer access via SCADA systems monitor site conditions.
2. Use of third-party O&M Service providers
3. Use of personnel from other sites
4. If appropriate, request O&M personnel to remain either on site or off site to protect their health and safety as well as the health and safety of others.
5. Have employees maintain 6ft of social distance between each other.
6. Coordinate with federal, state, and local agencies concerning public health and safety measures formulated in response to a pandemic.

<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
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## ANNEX E

PUC REQUIREMENT: Section 25.53 (e)(2)(E) - Hurricane Annex- N/A


Facility not located in Hurricane zone.

<b>CEB- TX EMERGENCY OPERATIONS PLAN</b> <b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
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## ANNEX F

PUC REQUIREMENT: Section 25.53 (e)(2)(F) - Cyber Security Annex-


Facility to follow Cyber Security Incident Plan. Plan maintained at the site and available for review if requested.

<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>  <b>Annex 1</b>	Substantive Rule §25.53
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## ANNEX G

PUC REQUIREMENT: Section 25.53 (e)(2)(G) - Physical Security Incident Annex

Facility to follow Physical Security Incident Plan. Plan maintained at the site and available for review if requested.

<b>CEB- TX EMERGENCY OPERATIONS PLAN</b>			
<b>ANNEX A-H</b>			
<b>TEXAS PUCT ELECTRIC SERVICE EOP</b>			
Distribution: Internal		Procedure No.: <b>CEBTX-PUCT-2</b>  <b>Annex 1</b>	Substantive Rule §25.53
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## ANNEX H

PUC REQUIREMENT: Section 25.53 (e)(2)(H) - Additional Annexes Particular to Utility - N/A