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NRG Energy Inc.
1005 Congress Avenue, Suite 950
Austin, Texas 78701

April 14, 2022

Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

RE: Project No. 53385, Project to Submit Emergency Operations Plans and Related Documents under 16 TAC § 25.53

To Whom It May Concern:

Pursuant to 16 Tex. Admin. Code (TAC) § 25.53, the following Retail Electric Providers submit their Executive Summary and Joint Emergency Operations Plan (EOP) for NRG Energy, Inc. Retail Electric Providers: Reliant Energy Retail Services, LLC (REP Certificate No. 10007), CPL Retail Energy LP (Certificate No. 10023), Direct Energy LP (Certificate No. 10040), Direct Energy Business LLC (Certificate No. 10011), First Choice Power LLC (Certificate No. 10008), Green Mountain Energy Company (Certificate No. 10009), Stream SPE, Ltd. (Certificate No. 10104), US Retailers LLC (Certificate No. 10177), WTU Retail Energy LP (Certificate No. 10022), and, XOOM Energy Texas, LLC (Certificate No. 10203) (collectively NRG Energy, Inc. REPs).

Consistent with 16 TAC § 25.53(c)(1)(A)(ii), information in the EOP that has been deemed confidential has been removed from the filing. Information in the Executive Summary that has been deemed confidential is being filed confidentially.

On this day, the required non-redacted EOP is being provided to the Electric Reliability Council of Texas consistent with its submission requirements.

The Joint EOP will be available for review by Commission Staff by appointment at 1005 Congress Ave., Ste. 950, Austin, Texas, 78701 or at an agreed meeting location.

Should you have any questions regarding this filing, or to schedule an appointment, please contact at me at 512.691.6150.

Sincerely,

A handwritten signature in black ink that reads "Lauren D. Damen". The signature is written in a cursive, flowing style.

Lauren D. Damen
Lauren.damen@nrg.com
Senior Counsel, NRG Energy, Inc.
State Bar No. 24078394
Attorney for NRG Energy, Inc. Retail Electric Providers

PROJECT NO. 53385

**PROJECT TO SUBMIT EMERGENCY § PUBLIC UTILITY COMMISSION
OPERATIONS PLANS AND RELATED §
DOCUMENTS UNDER 16 TAC § 25.53 § OF TEXAS**

**Executive Summary of the
Joint Emergency Operations Plan for NRG Energy, Inc. Retail
Electric Providers
April 2022**

Contents and Policies

The enclosed Joint Emergency Operations Plan for NRG Energy, Inc. (NRG) Retail Electric Providers (Joint EOP or EOP) is submitted by Reliant Energy Retail Services, LLC (Reliant) (REP Certificate No. 10007), CPL Retail Energy LP (Certificate No. 10023) (CPL), Direct Energy LP (Certificate No. 10040), Direct Energy Business LLC (Certificate No. 10011) (DEB), First Choice Power LLC (Certificate No. 10008), Green Mountain Energy Company (Certificate No. 10009), Stream SPE, Ltd. (Certificate No. 10104) (Stream Energy), US Retailers LLC (Certificate No. 10177), WTU Retail Energy LP (Certificate No. 10022) (WTU), and, XOOM Energy Texas, LLC (Certificate No. 10203) (XOOM Energy). These REPs are subsidiaries of NRG Energy, Inc. (NRG), and are collectively referred to as NRG Energy Inc. Retail Electric Providers (REPs) or NRG REPs.

The purpose of the EOP is to provide guidance to be followed by the NRG Crisis Management Team and applicable personnel throughout the departments in anticipation of or in response to any potential or actual business disruption impacting, or with the potential to impact, NRG's employees, customers, suppliers, shareholders, reputation, assets, or the environment, and to provide the framework for the continuation of business.

The EOP is comprised of pre-existing emergency and crisis planning and business continuity documents, as well as additions to address the new requirements set forth by 16 Tex. Admin. Code § 25.53 effective March 20, 2022. Unless otherwise indicated, the documents apply to all NRG REPs, even if one REP name is indicated for shorthand. Pre-existing documents incorporated within the EOP include the NRG Corporate Crisis Management Plan (CCMP), Business Continuity Alert Level Definitions, selected Business Continuity Plans (BCP), and the NRG Infectious Disease and Pandemic Policy. These documents address pre, mid, and post event efforts related to actual or potential crises and emergencies, including hazards and threats. As a whole, they are the Joint EOP and any activation of one is an activation of the Joint EOP.

NRG employs a Director, Business Continuity & Crisis Management who helps ensure that all entities, including NRG REPs have the appropriate teams, documentation, and action plans to handle all events and emergencies.

NRG REPs have extensive experience handling crises and emergencies. The contents of NRG's pre-existing documents and practices for emergencies and crises have been executed and have proven to be effective over the years, including through multiple hurricanes experienced by the Houston offices.

The EOP takes an all hazards approach to emergency and crisis management, with select additional detail for certain types of events. NRG has designed its crisis and emergency management framework to ensure scalable teams and resources are available to respond to any crisis or emergency situation.

The following information provides high-level information on how the EOP addresses rule requirements, followed by an index of where to find documentation applicable to each requirement.

Communications Plan: The EOP sets forth what activities take place during an event pertaining to communication with the public, media, customers, Public Utility Commission of Texas (Commission), and Office of the Public Utility Counsel (OPUC), including through internal and external communications plans as well as departmental plans. These plans ensure necessary outreach and availability for contact occur as appropriate at each level of an event.

Supplies Plan: The EOP sets forth the team responsible for supply procurement, as well as certain supplies that are maintained and may be procured as necessary depending on the event.

Staffing Plan: The EOP contains plans for staffing the crisis management team itself, and for staffing during events across departments, ensuring business can continue during events, including any necessary relocations.

Weather-Related Hazards Identification Plan: The EOP sets forth how weather-related hazards are identified by on-staff meteorologists and personnel, including some of the sources of information monitored to identify issues. The EOP can be activated as necessary based on those identification efforts.

Process to Activate EOP: Upon notification or identification of an event, the Director Business Continuity or Crisis Management Team Leader will activate the Corporate Crisis Management Team for mobilization at which point the EOP is considered activated.

Annexes: As noted above, NRG takes an all hazards approach to emergency and crisis management. However, as required by 16 TAC § 25.53(e)(3) certain details specific to certain events are addressed, including pandemics and epidemics; hurricanes; cyber security; and physical security incidents.

Index

16 TAC § 25.53 (c)(1)(A)(i)(II) – Reference to specific section(s) and page number(s) of the EOP that correspond with rule requirements.

Subsection with Requirement for REPs	Document	Section	Page Numbers*
(c)(1)(A)(i)(I)	Executive Summary	Contents and Policies	1-2
(c)(1)(A)(i)(II)	Executive Summary	Index	3-4
(c)(1)(A)(i)(III)	Executive Summary	Attachment D Record of Distribution (Filed Confidentially)	11
(c)(1)(A)(i)(IV)	Executive Summary	Attachments A and B, Affidavits (Affidavit A applies for all REPs except DEB, and Affidavit B Applies for DEB.)	6-9
(c)(1)(A)(ii)	EOP	Whole	All
(c)(4)(A)	Executive Summary	Attachment D, Record of Distribution (Filed Confidentially)	11
(c)(4)(B)	Executive Summary	Attachment C, Primary and Backup Emergency Contacts (Filed Confidentially)	10
(c)(4)(C)	Executive Summary	Attachments A and B, Affidavits (Affidavit A applies for all REPs except DEB, and Affidavit B Applies for DEB.)	6-9
(d)(1)(A)	EOP	Introduction and Background	3
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(d)(2)(C)	EOP	Communications Plan ¹	6-7
		Regulatory Crisis Communications Plan	8
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*Pages referenced in the EOP may contain references to other pages within the EOP with the detail related to requirements.

Affidavits

Provided as Attachment A to this Executive Summary is the Affidavit of Elizabeth Killinger, the highest-ranking representative and officer with binding authority over the following NRG REPs: Reliant, CPL, Direct Energy LP, First Choice Power LLC, Green Mountain Energy Company, Stream Energy, US Retailers LLC, WTU, and XOOM Energy.

Provided as Attachment B to this Executive Summary is the Affidavit of Scott Hart, the highest-ranking representative and officer with binding authority over DEB.

Record of Distribution – Access to and Training on Joint EOP

Provided as Attachment D to this Executive Summary is a record of distribution of people who have received access to and training on the relevant portions of the Joint EOP, along with the date of distribution of the relevant portion of the Joint EOP.

¹ The Communication Plan includes one attachment that does not apply to Direct Energy LP, Stream Energy, XOOM Energy, First Choice Power, WTU, and CPL, and one attachment that does not apply to DEB. Those differences are noted in the EOP.

List of Primary/Backup Emergency Contacts

Provided as Attachment C to this Executive Summary is a list of the emergency contacts for the NRG REPs.

Respectfully submitted,

A handwritten signature in cursive script, reading "Lauren Damen", is positioned above a solid horizontal line.

Lauren D. Damen
Senior Counsel, Regulatory Affairs
State Bar No. 24078394
NRG Energy, Inc.
1005 Congress Ave., Suite 950
Austin, Texas 78701
Telephone: (512)691-6150
Lauren.damen@nrg.com

Attorney for NRG Energy, Inc. REPs

ATTACHMENT A

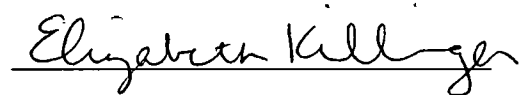
AFFIDAVIT OF ELIZABETH KILLINGER

STATE OF TEXAS §
§
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Elizabeth Killinger who, being duly sworn deposed and stated as follows:

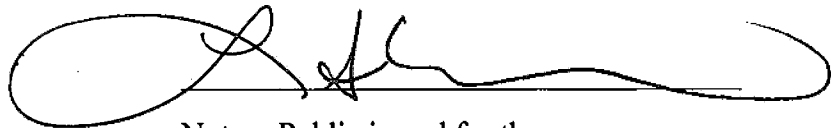
1. My name is Elizabeth Killinger. My business address is 910 Louisiana Street, Houston, Texas, 77002. I am over eighteen (18) years of age. I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
2. I am currently employed as Executive Vice President, NRG Home with NRG Energy, Inc. (NRG). Reliant Energy Retail Services, LLC (Certificate No. 10007) (Reliant), Direct Energy LP (Certificate No. 10040) (Direct Energy), Green Mountain Energy Company (Certificate No. 10009) (GMEC), Stream SPE, Ltd. (Certificate No. 10104) (Stream Energy), US Retailers LLC (Certificate No. 10177) (US Retailers), XOOM Energy Texas, LLC (Certificate No. 10203) (XOOM Energy), CPL Retail Energy LP (Certificate No. 10023) (CPL), First Choice Power LLC (Certificate No. 10008) (First Choice Power), and WTU Retail Energy LP (Certificate No. 10022) (WTU) are Retail Electric Providers (REPs) and are subsidiaries of NRG. I am the President for each of these REPs. I am authorized to make this affidavit on their behalf.
3. The above listed REPs, and Direct Energy Business LLC (Certificate No. 10011), are collectively the NRG Energy, Inc. REPs or NRG REPs. A separate affidavit is being provided on behalf of Direct Energy Business LLC.
4. The NRG REPs are submitting the Joint Emergency Operations Plan for NRG Retail Electric Providers (EOP).
5. On behalf of Reliant, Direct Energy, GMEC, Stream Energy, US Retailers, XOOM Energy, CPL, First Choice Power, and WTU, I affirm the following:
 - i. Relevant operating personnel are familiar with, and have received training, on the applicable contents and execution of the EOP. Such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - ii. The EOP has been reviewed and approved by the appropriate executives.

- iii. NRG REPs will comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule. In 2021, drills were conducted, and NRG REPs activated emergency procedures. Those activities included hurricane procedures within the last 12 months. For 2022, drills are currently planned, including a drill for May 2022. NRG REPs will comply with the new requirement for REPs to provide notification of a drill 30 days prior to that drill.
- iv. The EOP or a summary will be distributed to local jurisdictions if deemed necessary.
- v. NRG maintains business continuity plans that cover our corporate functions and retail operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of this affidavit, by the time of the signing of this affidavit, assigned personnel have either completed or initiated the training. All training will be completed within 90 days of this affidavit.



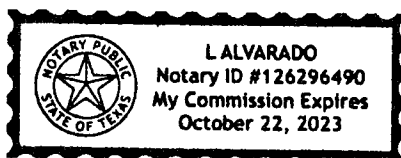
Elizabeth Killinger
Executive Vice President, NRG Home
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 13th day of April, 2022 to certify which witness my official hand and seal of office.



Notary Public in and for the
State of Texas

My Commission Expires:



ATTACHMENT B

AFFIDAVIT OF SCOTT HART

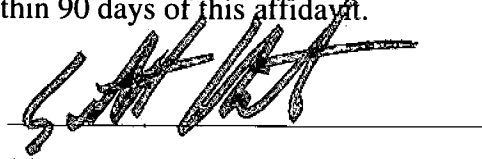
STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Scott Hart who, being duly sworn deposed and stated as follows:

1. My name is Scott Hart. My business address is 910 Louisiana Street, Houston, Texas, 77002. I am over eighteen (18) years of age. I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
2. I am currently employed as Vice President and General Manager, NRG Business with NRG Energy, Inc. (NRG). Direct Energy Business LLC (Certificate No. 10011) (DEB) is a Retail Electric Provider (REP), and subsidiary of NRG. I serve as President of DEB and I am authorized to make this affidavit on its behalf.
3. Direct Energy Business LLC (Certificate No. 10011), along with CPL Retail Energy LP (Certificate No. 10023), Direct Energy LP (Certificate No. 10040), First Choice Power LLC (Certificate No. 10008), Green Mountain Energy Company (Certificate No. 10009), Reliant Energy Retail Services, LLC (Certificate No. 10007), Stream SPE, Ltd. (Certificate No. 10104), US Retailers LLC (Certificate No. 10177), WTU Retail Energy LP (Certificate No. 10022), and, XOOM Energy Texas, LLC (Certificate No. 10203), are collectively the NRG Energy, Inc. REPs or NRG REPs.
4. A separate affidavit is being provided on behalf of the NRG REPs other than DEB.
5. The NRG REPs are submitting the Joint Emergency Operations Plan for NRG Retail Electric Providers (EOP).
6. On behalf of DEB, I affirm the following:
 - i. Relevant operating personnel are familiar with, and have received training, on the applicable contents and execution of the EOP. Such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - ii. The EOP has been reviewed and approved by the appropriate executives.
 - iii. NRG REPs will comply with the requirements for drills contained within the Commission's Emergency Operations Plan rule. In 2021, drills were

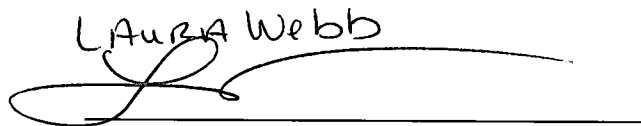
conducted, and NRG REPs activated emergency procedures. Those activities included hurricane procedures within the last 12 months. For 2022, drills are currently planned, including a drill for May 2022. NRG REPs will comply with the new requirement for REPs to provide notification of a drill 30 days prior to that drill.

- iv. The EOP or a summary will be distributed to local jurisdictions if deemed necessary.
- v. NRG maintains business continuity plans that cover our corporate functions and retail operations. These documents outline our plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of this affidavit, by the time of the signing of this affidavit, assigned personnel have either completed or initiated the training. All training will be completed within 90 days of this affidavit.



Scott Hart
Vice President and General Manager, NRG
Business
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 11 day of April, 2022 to certify which witness my official hand and seal of office.



Notary Public in and for the

State of Texas

County of Harris

My Commission Expires: 07/20/2025

Primary and Backup Emergency Contacts

This attachment has been filed confidentially.

ATTACHMENT D

Record of Distribution

This attachment has been filed confidentially.



**Joint Emergency Operations Plan
for NRG Energy, Inc.
Retail Electric Providers
April 2022**

**Joint Emergency Operations Plan
for NRG Energy, Inc. Retail Electric Providers**

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Joint Emergency Operations Plan for NRG Energy, Inc. Retail Electric Providers

Introduction and Background

Introduction

16 Tex. Admin. Code (TAC) § 25.53(d)(1)(A)

This Joint Emergency Operations Plan (Joint EOP or EOP) is applicable to all retail electric provider (REP) entities that are subsidiaries of NRG Energy, Inc. (NRG). Those entities are as follows, and collectively are referred to herein as NRG Energy, Inc. REPs or NRG REPs:

- CPL Retail Energy LP (Certificate No. 10023) (CPL);¹
- Direct Energy LP (Certificate No. 10040);²
- Direct Energy Business LLC (Certificate No. 10011) (DEB);³
- First Choice Power LLC (Certificate No. 10008);⁴
- Green Mountain Energy Company (Certificate No. 10009);
- Reliant Energy Retail Services, LLC (Certificate No. 10007);⁵
- Stream SPE, Ltd. (Certificate No. 10104) (Stream Energy);⁶
- US Retailers LLC (Certificate No. 10177);⁷
- WTU Retail Energy LP (Certificate No. 10022) (WTU);⁸ and,
- XOOM Energy Texas, LLC (Certificate No. 10203) (XOOM Energy).

The purpose of the EOP is to provide guidance to be followed by the NRG Crisis Management Team and applicable personnel throughout the departments in anticipation of or in response to any potential or actual business disruption impacting, or with the potential to impact, NRG's

¹ Doing business as CPL and CPL Retail Energy.

² Doing business as Direct Energy, Direct Energy Business Services, Direct Energy Multi-Family, and New Leaf Energy.

³ Doing business as CPL Business, Expert Energy, NRG Business, NRG, and WTU Business.

⁴ Doing business as First Choice Power and First Choice Power POLR.

⁵ Doing business as Reliant, Reliant Energy, Reliant Energy Business Services, and NRG Home.

⁶ Doing business as Stream Energy, Stream, and SG&E.

⁷ Doing business as Cirro Energy, Discount Power, Compassion Energy, Pennywise Power, and Pennywise.

⁸ Doing business as WTU Retail Energy and WTU.

employees, customers, suppliers, shareholders, reputation, assets, or the environment, and to provide the framework for the continuation of business.

The EOP is comprised of pre-existing emergency and crisis planning and business continuity documents, as well as additions to address the new requirements set forth by 16 Tex. Admin. Code § 25.53 effective March 20, 2022. Unless otherwise indicated, the documents apply to all NRG REPs, even if one REP name is indicated for shorthand. Pre-existing documents incorporated within the EOP include the NRG Corporate Crisis Management Plan (CCMP), Business Continuity Alert Level Definitions, selected Business Continuity Plans (BCP), and the NRG Infectious Disease and Pandemic Policy. These documents address pre, mid, and post event efforts related to actual or potential crises and emergencies, including hazards and threats. As a whole, they are the Joint EOP and any activation of one is an activation of the Joint EOP.

NRG employs a Director, Business Continuity & Crisis Management who helps ensure that all entities, including NRG REPs have the appropriate teams, documentation, and action plans to handle all events and emergencies.

NRG REPs have extensive experience handling crises and emergencies. The contents of its pre-existing documents and practices for emergencies and crises have been executed and have proven to be effective over the years, including through multiple hurricanes experienced by the Houston offices.

The EOP takes an all hazards approach to emergency and crisis management, with select additional detail for certain types of events. NRG has designed its crisis and emergency management framework to ensure scalable teams and resources are available to respond to any crisis or emergency situation.

Responsible Individual(s)

16 TAC § 25.53(d)(1)(B)

The following is the list of individual(s) responsible for maintaining and implementing NRG's EOP:

- Director, Business Continuity & Crisis Management;
- Executive Vice President, NRG Home;
- Executive Vice President, Head of Competitive Markets & Policy;
- Senior Vice President, Administration, & Chief Compliance Officer; and,
- Senior Vice President, IT.

The following is the list of individual(s) who can change the EOP:

- Director, Business Continuity & Crisis Management; and,
- Director, Regulatory Affairs.

EOP Date, Controlling Version, and Revision Control Summary

16 TAC § 25.53(d)(1)(C), (D), and (E)

This EOP was approved April 13, 2022, and supersedes any previous EOP submitted by NRG.

The following table Includes the applicable date of each change since the last time the EOP was adopted by NRG.*

Revision Number	Date	Change
1.0	April 13, 2022	Original submission

*This table references the EOP in its current form. Parts of the EOP were previously adopted and potentially previously revised.

Communications Plan

16 TAC § 25.53 (d)(2)(C)

NRG has robust communication plans to ensure that appropriate communication about an event is occurring, and that communications regarding business continue. The description of these communication procedures can be found in multiple internal response plans that are part of this EOP, and are indexed below for ease of reference. Referenced documents are included within this EOP as attachments.

Communications Plan Subject	EOP Section or Attachment	Reference ⁹
Public	Attachment A - CCMP	pp. 40-41
	Attachment C - BCP 2021	pp. 93-96
Media	Attachment A - CCMP	<ul style="list-style-type: none">• p. 20• p. 31• pp. 40-41• p. 65
	Attachment C - BCP 2021	pp. 93-96, Alert Levels 1 – 4
Customers	Attachment D - BCP 2022	Throughout, especially pp. 99-101, Alert Levels 1 – 4
	Attachment E- BCP 2022	Throughout, especially pp. 105-108, Alert Levels 1 – 4
	Attachment F - BCP 2022	Throughout, especially pp. 113-117, Alert Levels 1-4
	Attachment G - BCP 2022 ¹⁰	Throughout, especially pp. 124-131, Alert Levels 1-4

⁹ Page number references are to the EOP page number(s). Attachments may also have separate page numbering.

¹⁰ This attachment does not apply to DEB.

	Attachment H - BCP 2021 ¹¹	Throughout, especially pp. 133-137, Alert Levels 1-4
Commission	Regulatory Crisis Communications Plan Attachment A - CCMP Attachment F - BCP 2022	p. 8, Subpart a p. 59 Throughout, especially pp. 113-116, Alert Level 2 and Alert Level 4
Complaint Handling	Attachment F - BCP 2022 Regulatory Crisis Communications Plan	Throughout, please refer to mentions of complaints and escalated issues. Primarily pp. 113-116. p. 8, Subpart b
Office of the Public Utility Counsel	Regulatory Crisis Communications Plan	p. 8, Subpart a

¹¹ This attachment does not apply to Direct Energy LP, Stream Energy, XOOM Energy, First Choice Power, WTU, and CPL.

Regulatory Crisis Communications Plan

Communication with the Public Utility Commission of Texas and Office of the Public Utility Counsel 16 TAC § 25.53 (d)(2)(C)

a) Communication with the Public Utility Commission of Texas (PUCT or Commission) and Office of the Public Utility Counsel (OPUC).

- i. NRG REPs keep contacts updated with the Commission through its agency portal. Regulatory Affairs Staff can be contacted by the Commission or OPUC at the listed numbers and emails as needed.
- ii. When conditions warrant, the Texas Regulatory Affairs Team will proactively contact the appropriate Commission Staff or Commissioners to keep them informed prior to, during, and/or after an event. Information will cover items necessary, including but not limited to operating status, and coordination of information provided to customers.
- iii. The Texas Regulatory Affairs Team will remain in communication with each other through phone, email, and other electronic communications, and will ensure staffing is appropriate with sufficient availability to handle all communications.
- iv. The Texas Regulatory Affairs team will remain in contact with the necessary business resources to ensure access to timely information to address questions from Commissioners, Commission Staff, or OPUC.

b) Communication With the Commission Regarding Complaints.

- i. The Texas Regulatory Affairs Team, the Escalated Issues Team, and the Customer Advocacy Team who work complaints in communication with the Commission Staff will staff to ensure all complaints are worked within the required timeframes.
- ii. One or more personnel will be available during business hours to handle any urgent or emergency complaints.
- iii. If conditions warrant, working hours may be extended past business hours to handle situations.
- iv. Please also refer to the Communications Plan for relevant references to the Complaints Communication Plan.

Supplies Plan
16 TAC § 25.53(d)(3)

The chart below provides the location of certain information addressing supplies and supply management.

EOP Section or Attachment	Reference
Pandemic and Epidemic Annex	p. 12
Attachment A - CCMP	<ul style="list-style-type: none">• p. 47• p. 50• p. 61• p. 66-70• pp. 73-75

Staffing Plan

16 TAC § 25.53(d)(4)

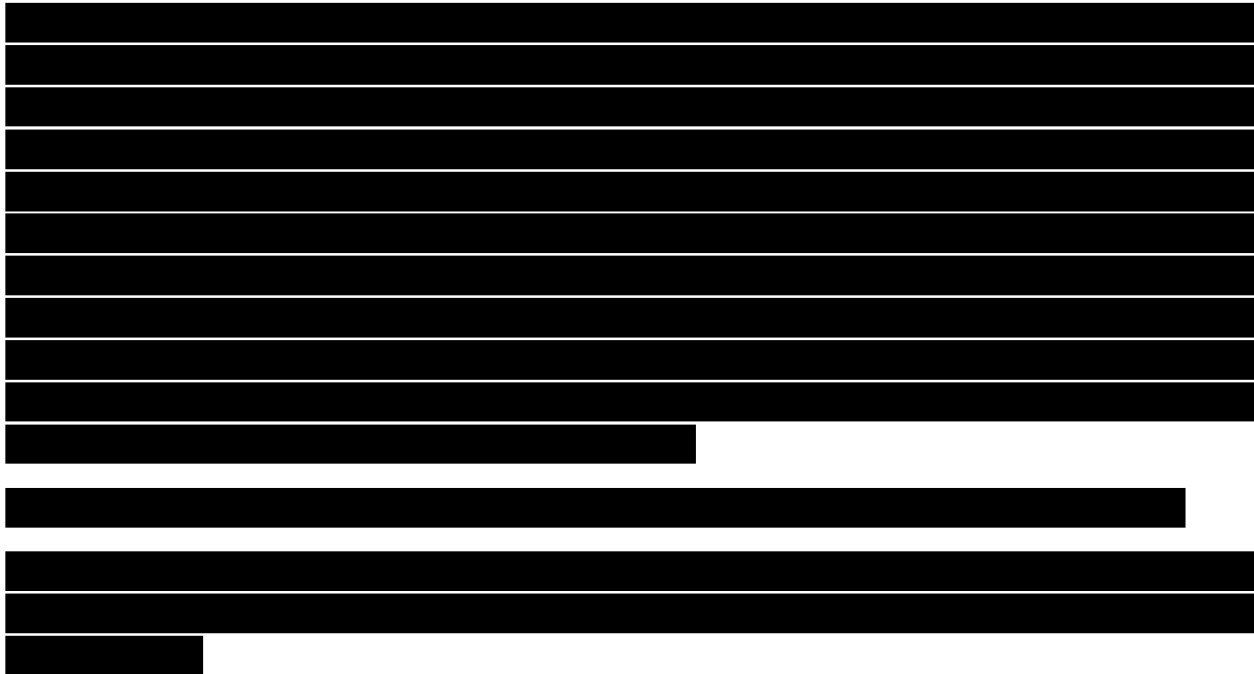
Emergency and Crisis Management Staffing: NRG has robust staffing plans to ensure that appropriate staffing is available during an event. While much of the entire CCMP (EOP Attachment A) addresses appropriately staffing events, the following chart provides an index of certain specific information concerning Staffing.

EOP Section or Attachment	Reference
Attachment A - CCMP	<ul style="list-style-type: none">• p. 19• pp. 21 - 22• p. 25• pp. 44-47• pp. 49-53• p. 55• p. 60-61• p. 63-64• p. 66-68• p. 84
Attachment B- Business Continuity Alert Level Definitions	<ul style="list-style-type: none">• pp. 85-90



Weather-Related Hazards Identification Plan

16 TAC § 25.53(d)(5)



Process to Activate EOP

16 TAC § 25.53(d)(5)

Upon notification or identification of an event, the Director Business Continuity or CMT Team Leader will activate the Corporate Crisis Management Team for mobilization at which point the EOP is considered activated. The following chart provides an index of information concerning the process to activate the EOP.

EOP Section or Attachment	Reference
Attachment A - CCMP	<ul style="list-style-type: none">• pp. 18-19• pp. 22-24• pp. 81-84
Attachment B - Business Continuity Alert Level Definitions	<ul style="list-style-type: none">• p. 87

Annexes

16 TAC § 25.53(e)(3)

The Joint EOP is developed as an all hazards plan which on the whole encompasses each of the items required for the annex. In NRG REPs' experience, this is an efficient and effective method of crisis and emergency planning and management.

The following chart highlights areas specifically applicable to the specified events requested for the annexes, as well as addresses certain additional information concerning the applicable topic.

Annex	EOP Section or Attachment	Reference
(A) Pandemic and Epidemic		
<div style="background-color: black; width: 100%; height: 100px;"></div>		
	Attachment A – CCMP	<ul style="list-style-type: none"> • Whole • p. 22
	Attachment J – NRG Infectious Disease and Pandemic Policy	Whole (pp. 142-147)
(B) Hurricane, including evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone.		
	Attachment A - CCMP	<ul style="list-style-type: none"> • Whole • P. 22 • p. 64 • p. 81
	Weather-Related Hazards Identification Plan	<ul style="list-style-type: none"> • p. 11
	Attachment B - Business Continuity Alert Level Definitions	<ul style="list-style-type: none"> • p. 87 • p. 90

(C) Cyber Security		
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	<div style="background-color: black; height: 15px; width: 100%;"></div> <div style="background-color: black; height: 15px; width: 100%;"></div>	
	Attachment A - CCMP	<ul style="list-style-type: none"> • Whole • p. 22 • p. 29 • p. 38 • p. 49-52 • p. 54 • p. 57 • p. 61 • p. 64 • p. 68
(D) Physical Security Incident		
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	Attachment A - CCMP	<ul style="list-style-type: none"> • Whole • p. 22 • pp. 63-65
	Attachment I – Business Continuity Plan 2021	pp. 138-141

Emergency Operations Plan for NRG Energy, Inc. Retail Electric Providers

Attachments Removed

Consistent with 16 Tex. Admin. Code § 25.53(c)(3)(A)(ii), the following attachments have been removed from the filing because each has been determined to be confidential information.

Attachments.....	Pages
Attachment A - Corporate Crisis Management Plan.....	14-84
Attachment B - Business Continuity Alert Level Definitions.....	85-90
Attachment C - Business Continuity Plan 2021.....	91-96
Attachment D - Business Continuity Plan 2022.....	97-101
Attachment E - Business Continuity Plan 2022.....	102-108
Attachment F - Business Continuity Plan 2022.....	109-117
Attachment G - Business Continuity Plan 2022.....	118-131
Attachment H - Business Continuity Plan 2021.....	132-137
Attachment I - Business Continuity Plan 2021.....	138-141
Attachment J - NRG Infectious Disease and Pandemic Policy.....	142-147