



Filing Receipt

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Akuo Energy - TG East Wind Project, LLC
Emergency Operations Plan Executive Summary

Executive Summary:

As a registered PGC, TG EAST WIND PROJECT, LLC is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. TG EAST WIND PROJECT, LLC has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. This plan must be filed with the PUCT either (a) no later than April 18, 2022 (the April 15, 2022 having been extended by the Commission) if it is a new facility or (b) beginning calendar year 2023, by April 15th on an annual basis if the circumstances exist as outlined in 16 TAC § 25.53(c)(1)(3). At all times, the most recent approved copy of the TG EAST WIND PROJECT, LLC Emergency Operations Plan must be available at the TG EAST WIND PROJECT, LLC's main office for PUCT inspection.

For TG EAST WIND PROJECT, LLC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

- An Approval and Implementation Section that (a) introduces the EOP and outlines its applicability; (b) lists the individuals responsible for maintaining and implementing the EOP and those who can change the EOP; (c) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to subsection (c)(1) of the rule; (d) provides a dated statement that the current EOP supersedes previous EOPs; and (e) states the date the EOP was most recently approved by the entity. (Page 3 of EOP)
- A communication plan describing the procedures during an emergency for TG East Wind Project to communicate with the media, the Commission, the Office of Public Utility Council (OPUC), fuel suppliers, local state and governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity, and the applicable reliability coordinator. (Page 4 of EOP)
- A Plan to Maintain Pre-identified Supplies for Emergency Response
- A Plan that addresses staffing during an emergency response (Page 7 of EOP)
- A Plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process TG East Wind Project follows to activate the EOP (Page 8 of EOP)
- List of primary and, if possible, backup emergency contacts, including identification of specific individuals who can immediately address urgent requests and questions from the Commission during an emergency (Page 4 of EOP)

- Affidavit stating the following:
 - Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and 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 during the course of an emergency;
 - The EOP has been reviewed and approved by the appropriate executives;
 - Drills have been conducted to the extent required by subsection (f) of the rule;
 - The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
 - The entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
 - The entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training
- **Annexes to be included in the EOP** - A Generation resource/PGC must include
 - A weather emergency annex that includes
 - Operational plan for responding to a cold and hot weather emergency, distinct from the weather preparations required under § 25.55
 - EOP-001, page 7 and Annex W
 - Verification of the adequacy and operability of fuel switching equipment, if installed; and
 - EOP-001, page 9. It is not applicable to this site.
 - A checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency
 - Annex D
 - A water shortage annex that addresses supply shortages of water used in the generation of electricity;
 - EOP-001, page 8. This is not applicable to this site.
 - A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;
 - Annex E
 - A pandemic and epidemic annex;
 - Annex F
 - A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
 - Annex L
 - A cyber security annex;
 - Annex J
 - A physical security incident annex; and
 - Annex G
 - Any additional annexes as needed or appropriate to the entity's particular circumstances

- Drills
 - Annex B

As a registered PGC, it is TG East Wind Project, LLC's intent to fully comply with all requirements and expectations of the Public Utilities Commission of Texas.

Record of Distribution

As required by 16 TAC 25.53(c)(4)(A), TG East Wind Project provides the following record of distribution in table format that includes the titles and names of persons in TG East Wind Project's organization receiving access to and training on the EOP and dates of access to or training on the EOP, as appropriate.

TG East Emergency Operations Plan					
	Target/Date	Andrew Ramos	Liv Kirk	David Arendol	Andrea Miller
Updated EOP Distribution	4/15/2022	x	x	x	x
Updated EOP Training	5/15/2022				
NIMS IS-100	12/15/2022				
NIMS IS-200	12/15/2022				
NIMS IS-700	12/15/2022				
NIMS IS-800	12/15/2022				

AFFIDAVIT

STATE OF ILLINOIS §
 §
COUNTY OF COOK §

Before me, the undersigned notary public, on this day personally appeared Thomas Coté, to me known to be the person whose name is subscribed to the foregoing instrument, who being duly sworn according to law, deposes and says:

“1. My name is Thomas Coté. I am over the age of eighteen and am a resident of the State of Michigan. I am competent to testify to all the facts stated in this Affidavit, and I have the authority to make this Affidavit on behalf of TG East Wind Project LLC (“TG East”).

2 I swear or affirm that in my capacity as President of TG East, I have personal knowledge of the facts stated in the Emergency Operations Plan (“EOP”) submitted to ERCOT and filed into Project No. 53385.

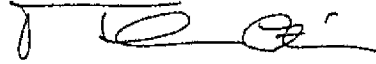
3. I further swear or affirm that I have personal knowledge of the facts stated below:

- Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and 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 during the course of an emergency;
- The EOP has been reviewed and approved by the appropriate executives;
- Drills have been conducted to the extent required by subsection (f) of PUC Subst. R. § 25.53 and limited by paragraph 4 below;
- The EOP or an appropriate summary has been distributed to local jurisdictions as needed;
- TG East maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- TG East’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management Systems training by December 2022.

4. TG East intends to conduct a drill consistent with subsection (f) of PUC Subst. R. § 25.53 by December, 2022 and will provide notice to the Commission at least 30 days before that drill is conducted. Once that drill is conducted, TG East will notify the Commission.

5. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief.”

Further affiant sayeth not.



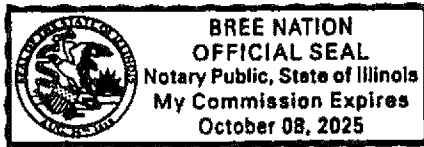
Thomas Côté
President
TG East Wind Project LLC

SWORN TO AND SUBSCRIBED TO BEFORE ME on the 18 day of April 2022.



Notary Public in and for the
State of Illinois

My Commission Expires:



Emergency Operations Plan

Akua Energy

TG East Wind Project, LLC

Version 1.0
Effective Date: April 15, 2022

This Emergency Operations Plan (AE-TGEWP-EOP-001) is developed to comply with PUCT Rule 25.53

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Approval and Implementation

Introduction:

- This EOP is developed to help ensure TG EAST WIND PROJECT's continued power generation operations in the event of emergency conditions, including, but not limited to pandemic(s) or severe weather. This plan includes the necessary elements, pursuant to PUCT Rule §25.53.

The following individuals are responsible for maintaining and implementing the EOP, and those who can change the EOP.

Name	Title	Date
David Arendol	Asset Manager	04/18/2022
Andrea Miller	Vice President of Asset Management	04/18/2022
David Ludwig	Network Manager	04/18/2022

- Below, TG East Wind Project provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (1) of this subsection.

Version	Approval Date	Effective Date	Revision Summary
1.0	04/18/2022	04/18/2022	Initial Emergency Operations Plan

As of 04/15/2022, EOP Version 1.0, approved on 04/18/2022, supersedes all previous EOPs.

Communication Plan

An entity with generation operations must describe the procedures during an emergency for communicating with,

- Media outlets
- PUCT
- QSE
- OPUC
- Fuel suppliers
- Local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity
- ERCOT, as the Reliability Coordinator, Balancing Authority, and ISO.

TG EAST WIND PROJECT Emergency Operations Contact List

EMERGENCY OPERATIONS CONTACT LIST (EXTERNAL)			
NAME	ENTITY	PHONE NUMBER	EMAIL
John Murray	Tenaska (QSE)	(817) 462-1034	JMurray@tnsk.com
John Lawson	ERCOT	(512) 248-6474	John.Lawson@ercot.com
Robert Reed	General Electric	(661) 221-1075	Robert.reed1@ge.com
PUCT Infrastructure Staff		(512) 936-7197	
Knox County Sheriff's Department		9-1-1	
Crowell Volunteer Fire Department		9-1-1	
Knox County Hospital		9-1-1	
Safety Kleen (Disposal and spill response contractor)		(432) 296-4683	

TG EAST WIND PROJECT Internal Emergency Operations Contact List

INTERNAL TG EAST WIND PROJECT EMERGENCY OPERATIONS CONTACT LIST			
NAME	ENTITY	PHONE NUMBER	EMAIL
Andrew Ramos	Akuo Energy	(312) 340-7590	ramos@akuoenergy.com
David Arendol	Akuo Energy	(312) 286-6488	arendol@akuoenergy.com
Andrea Miller	Akuo Energy	(312) 560-2017	miller@akuoenergy.com
Whitney Kirk	Akuo Energy	(813) 838-7750	kirk@akuoenergy.com

Timely communications are essential during an emergency. For that reason, Akuo has implemented the following requirements.

- All employees will have access to a minimum of one working cellphone when on the Project Site. All work cellphones receive emergency text and call alerts. All employees will carry or have easy access to a cellphone in case of an emergency. All phones will be recharged daily.
- If the cellphone communications are not clear, employees should proceed to the O&M Building for further instructions from the site management.
- The O&M building has a computer application in place to monitor and detect lightning and severe weather near the Project Site and communicate to site personnel in the field.
- Employees at the O&M building monitor the Project Site during normal working hours and can provide limited information to emergency personnel if the BOP manager and identified secondary contacts are not available. Remote operations of towers (shutdowns, etc.) can be conducted both from the WTG individually and O&M Building or from the Remote Operations Control (ROC) center if necessary.

- The Site Manager or deputy can be available via cellphone 24 hours per day to coordinate emergency responses via the “duty phone.”

Definitions and Acronyms

TERM	ACRONYM	DEFINITION
<u>Annex</u>		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.
<u>Drill</u>		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.
<u>Electric Reliability Council of Texas</u>	ERCOT	Independent System Operator for approximately 90% of the state of Texas.
<u>Emergency</u>		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.
<u>Entity</u>		An electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
<u>Hazard</u>		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 the continuity of electric service.
<u>Power Generation Company</u>	PGC	Generates electricity intended to be sold at wholesale and does not own a transmission or distribution facility in this state (with some exceptions, see PUC Substantive Rule 25.5(23) and 25.5(45)).
<u>Public Utility Commission of Texas</u>	PUCT	The PUCT is the regulatory body for energy entities in the state of Texas.
<u>Qualified Scheduling Entity</u>	QSE	Submit bids and offers on behalf of resource entities (REs) or load serving entities (LSEs) such as retail electric providers (REPs).
<u>State Operations Center</u>	SOC	The SOC is operated by TDEM on a 24/7 basis and serves as the state warning point.
<u>Texas Department of Energy Management</u>	TDEM	coordinates the state emergency management program, which is intended to ensure the state and its local governments respond to and recover from emergencies and disasters and implement plans and programs to help prevent or lessen the impact of emergencies and disasters.
<u>Threat</u>		The intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

General Summary

As a registered PGC, TG EAST WIND PROJECT is required to develop, maintain, and utilize (when necessary) an Emergency Operations Plan, pursuant to the requirements set forth in the PUCT Rule §25.53. TG EAST WIND PROJECT has developed this plan to comply with the PUCT Substantive rule and applicable NERC Reliability Standards, as well as ensure a greater likelihood of continued operations during an emergency. At all times, the most recent approved copy of the TG EAST WIND PROJECT Emergency Operations Plan must be available at the TG EAST WIND PROJECT's main office for PUCT inspection.

For TG EAST WIND PROJECT, a PGC, the PUCT has ordered the following information be included and/or addressed in the Emergency Operations Plan:

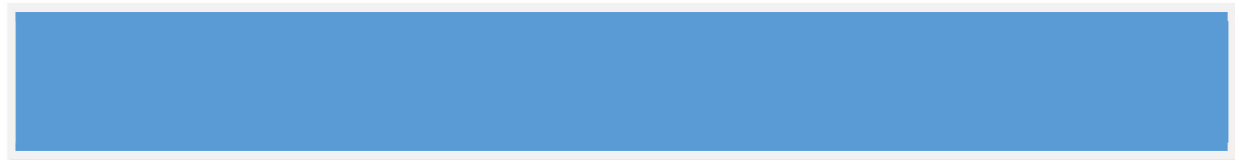
Maintenance of Pre-identified Supplies for Emergency Response

A plan to maintain pre-identified supplies for emergency response.

TG EAST WIND PROJECT staff shall identify any supplies necessary for continued operations during an extreme weather event, and must procure, to the extent possible, those supplies. A list of some of these supplies is contained below:

- Fuel for generator
- Fuel for heaters
- Gas for breakers or load-interrupting switches (if applicable)
- Oil and nitrogen for transformers (if applicable)
- Parts used for maintenance or repair of equipment
- Fuel for vehicles (if applicable)
- Etc.

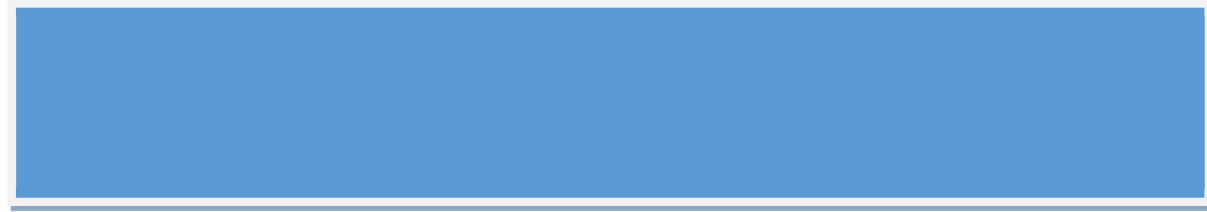
See Annex D for a listing of supplies required for emergency response.



Staffing During Emergency Response

A plan that addresses staffing during emergency response. TG EAST WIND PROJECT will identify appropriate staff and staffing levels to respond to emergency conditions, including, but not limited to severe weather events, physical threats or physical damage, and cyber security events.

TG EAST WIND PROJECT shall identify operational and management staff that will remain on call or on stand-by for the duration of the emergency (Annex C). This list may be dynamic and will be subject to change should conditions warrant it.



Plan to Address Identification of Weather-Related Hazards and the Process for EOP Activation

- Tornadoes
- Hurricanes
- Extreme Cold Weather
- Extreme Hot Weather
- Drought
- Flooding

Weather Emergency (See Annex W)

- operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;
- verification of the adequacy and operability of fuel switching equipment, if installed. TG East does not have any fuel switching equipment since wind energy is the fuel source of generating power.
- a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

For severe cold weather, TG EAST WIND PROJECT shall identify, through inspection, areas of the generating facility that may be most vulnerable to malfunction during extreme cold events. TG EAST WIND PROJECT staff shall ensure the following:

1. TG EAST WIND PROJECT staff will ensure heat tracing is present and functional for all appropriate exposed instrumentation and/or equipment, where applicable.
2. Where appropriate and necessary, temporary barriers shall be erected to shield sensitive or exposed equipment and instrumentation from wind and freezing precipitation
3. Temporary barriers may be constructed of plastic sheeting or other material that is sufficient to protect exposed equipment and instrumentation, and may contain, if conditions warrant, a portable heat source to keep temperatures above freezing in the designated area.

4. Other measures may be taken, as the generation facility staff see fit, to protect the facility during an extreme cold weather event.

For severe hot weather, TG EAST WIND PROJECT staff shall ensure the following:

5. Proper ventilation is present and functional for any areas where extreme hot temperatures may negatively impact generator output.
6. In addition to this, portable fans may be mobilized to force air around potentially affected areas.
7. Ensure normal facility cooling measures are maintained and operational.

In all cases, TG EAST WIND PROJECT staff will ensure that any substation or switchyard equipment that it owns is properly weatherized. This includes the following:

1. Ensuring all breaker and transformer oil levels, SF6 levels, nitrogen levels, and air compressor tank levels are adequate for that equipment manufacturer and model.
2. Heaters in breaker and transformer cabinets are functioning properly
3. Adequate supply of spare gas and oil is available to be used during an emergency



A water shortage annex that addresses supply shortages of water used in the generation of electricity;

TG EAST WIND PROJECT assets do not use water to generate power, therefore this annex is inapplicable.



A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;

TG EAST WIND PROJECT's plan for emergency operation addresses its process for recovering generation capacity, should an emergency force a derate, a unit trip, or inability to generate and fulfill its MW obligations. These actions are listed in Annex E.



A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;

In the event of a hurricane, the first priority is always the health and safety of TG EAST WIND PROJECT personnel. TG EAST WIND PROJECT's hurricane response process is listed below:

1. Ensure all TG EAST WIND PROJECT personnel and any potentially affected public personnel are not in danger.

2. By using the evacuation routes in the link below, TG EAST WIND PROJECT personnel must evacuate at a time recommended by local authorities.
3. TG EAST WIND PROJECT facilities should be hardened, to the extent possible, against lasting damage from a hurricane. Some of these hardening details are listed below:
 1. Ensure all loose material or equipment is secured.
 2. Ensure proper draining channels exist and are functional

TG EAST WIND PROJECT facilities in [Region 1](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

TG EAST WIND PROJECT facilities in [Region 2](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

TG EAST WIND PROJECT facilities in [Region 3](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

TG EAST WIND PROJECT facilities in [Region 4](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

TG EAST WIND PROJECT facilities in [Region 5](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

TG EAST WIND PROJECT facilities in [Region 6](#), as specified by TDEM, shall use the hurricane [evacuation routes](#) published by the Texas Department of Transportation.

Checklist(s) for generating facility personnel to address emergency events

TG EAST WIND PROJECT shall use the checklist in Annex C to identify which personnel shall address events that arise during the emergency.



A plan for alternative fuel testing if the facility has the ability to utilize alternative fuels

An affidavit is required, as TG EAST WIND PROJECT facilities do not use alternate fuels.

Affidavit from an owner, partner, officer, manager, or other official with responsibility for TG EAST WIND PROJECT's operations affirming that all relevant TG EAST WIND PROJECT operating personnel are familiar with the contents of the emergency operations plan; and such personnel are committed to following the plan except to the extent deviations are appropriate under the circumstances during the course of an emergency.

Completed, executed, and notarized Annex A.

PUC Filing Requirements

TG EAST WIND PROJECT must file an emergency operations plan (EOP) and executive summary no later than April 15, 2022.

1. An entity must file with the commission:
 1. an executive summary that:
 1. describes the contents and policies contained in the EOP;
 2. includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
 3. includes the record of distribution required under paragraph (4)(A) of this subsection; and
 4. contains the affidavit required under paragraph (4)(C) of this subsection; and
 2. a complete copy of the EOP with all confidential portions removed.
2. For an entity with operations within the ERCOT region, the entity must submit its unredacted EOP in its entirety to ERCOT.
3. In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:
 1. A record of distribution that contains the following information in table format:
 1. titles and names of persons in the entity's organization receiving access to and training on the EOP; and
 2. dates of access to or training on the EOP, as appropriate.
 2. A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.
 3. An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
 1. relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and 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 during the course of an emergency;
 2. the EOP has been reviewed and approved by the appropriate executives;
 3. drills have been conducted to the extent required by subsection (f) of this section;

4. the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
5. the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
6. the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received appropriate training.

Annual Review

An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:

1. An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:
 1. file with the commission an executive summary that:
 1. describes the changes to the contents or policies contained in the EOP;
 2. includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
 3. includes the record of distribution required under paragraph (4)(A) of this subsection; and
 4. contains the affidavit required under paragraph (4)(C) of this section;
 2. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
 3. submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.
2. An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:
 1. a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;
 2. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and
 3. the affidavit described under paragraph (4)(C) of this subsection.

Annual Drill

An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission

staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.

By applying the Emergency Operations Drill Instructions and completing Annex B, TG EAST WIND PROJECT Emergency Operations Plan shall be tested each year, no later than INSERT DATE HERE, and includes a review section, to identify and correct any vulnerabilities in the Emergency Operations Plan. TG EAST WIND PROJECT Emergency Operations Drill Procedure has a section dedicated to any generation facility that is located within a defined hurricane evacuation zone.

TG EAST WIND PROJECT, as a registered RE, shall provide ERCOT with any updated versions of their emergency operations plan by **June 1** for any updates made between November 1 and April 30, and by **December 1** for any updates made between May 1 through October 31. TG EAST WIND PROJECT shall submit all updated plans electronically. Annex I is the attestation ERCOT requires for notification, along with the EOP.

A cyber security annex;

1. The TG EAST WIND PROJECT Cyber Security Incident Response Policy (Annex J) contains this information.

A physical security incident annex;

This section contains reporting for physical threats to any TG EAST WIND PROJECT facility, as well as actual damage to or destruction of any TG EAST WIND PROJECT facility, per NERC Reliability Standard EOP-004. The DOE digital form, OE-417 shall be used to communicate physical attacks and cyber security incidents.

Please see Annex G - TG EAST WIND PROJECT Physical Security Plan (EOP-004)

A pandemic and epidemic annex;

TG EAST WIND PROJECT's existing pandemic/epidemic plan for business continuity is listed in Annex F.

NAME
Akua Energy
Company Address
Chicago, IL 60654

312-283-3400
cote@akuaenergy.com

Public Utility Commission of Texas

PO Box 13326
Austin, TX 78711-3326

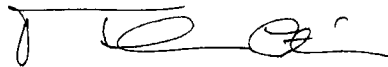
CC/BCC Block:
Enclosure:

Greetings:

This letter is to serve as notice to the Public Utility Commission of Texas that all of the TG East Wind Project relevant operating personnel are familiar with Akua Energy's Emergency Operations Plan (*AE-TGEWP-EOP-1*) and are familiar with their duties contained therein. TG East Wind Project's relevant operating staff, and its senior management are committed to following the Emergency Operations Plan, and to the extent that deviations are required, they must be appropriate for the operating conditions during the course of the emergency. Akua Energy's senior management has reviewed and approved the aforementioned Emergency Operations Plan and necessary drills have been or will be completed this current year, and this plan has been provided to necessary entities, to include ERCOT. The Emergency Operations Plan contains provisions to return the generating facility to normal operations, to the extent possible, during and after the emergency conditions. TG East Wind Project's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received training, which may include IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Feel free to contact me with any questions or concerns.

Sincerely,



Thomas Cote

CEO

Akua Energy