



Filing Receipt

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Akquo Energy - Rocksprings Val Verde Wind, LLC
Emergency Operations Plan Executive Summary

Executive Summary:

As a registered PGC, ROCKSPRINGS VAL VERDE WIND, 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. ROCKSPRINGS VAL VERDE WIND, 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) before COD if it is a new facility or (b) within 30 days of a substantive change to the plan. Any substantive change to the plan, made between November 1st and April 30th must be filed no later than June 1st of that year. If a substantive change is made to the plan between May 1st and October 31st, the submission date is no later than December 1st of that same year. At all times, the most recent approved copy of the ROCKSPRINGS VAL VERDE WIND, LLC Emergency Operations Plan must be available at the ROCKSPRINGS VAL VERDE WIND, LLC's main office for PUCT inspection.

For ROCKSPRINGS VAL VERDE WIND, LLC, 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
- List of primary and, if possible, backup emergency contacts
- 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 since this is a wind energy generation facility.
 - 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 include 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 Rocksprings Val Verde Wind, 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), Rocksprings provides the following record of distribution in table format that includes the titles and names of persons in Rockspring's organization receiving access to and training on the EOP and dates of access to or training on the EOP, as appropriate.

Rocksprings Val Verde Wind Emergency Operations Plan						
	Target/Date	Clayton Lauderdale	Jose Gomez	David Arendol	Andrea Miller	Liv Kirk
Updated EOP Distribution	4/15/2022	x	x	x	x	X
Updated EOP and Extreme Weather Training	5/15/2022					
NIMS IS-100	December 2022					
NIMS IS-200	December 2022					
NIMS IS-700	December 2022					
NIMS IS-800	December 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 Rocksprings Val Verde Wind LLC (“Rocksprings”).

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

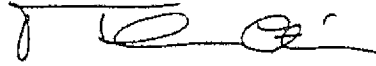
3. I further swear or affirm that I have personal knowledge of the facts stated below:

- 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;
- Rocksprings maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- Rocksprings’ 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. Rocksprings 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, Rocksprings will notify the Commission.

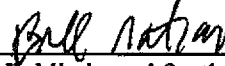
5. I further swear or affirm the information, statements and/or representations contained in the Emergency Operations Plan are true, complete, and correct to the best of my knowledge and belief.”

Further affiant sayeth not.



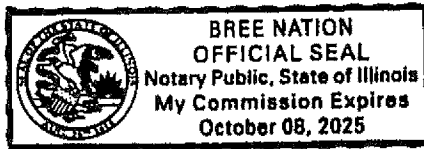
Thomas Côté
Manager
Rocksprings Val Verde Wind LLC

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:





Thomas Cote
Akua Energy
415 N Lasalle Dr.
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 Rocksprings Val Verde Wind relevant operating personnel are familiar with Akua Energy's Emergency Operations Plan (AE-RVVW-EOP-1) and are familiar with their duties contained therein. Rocksprings Val Verde Wind'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. Rock Springs Val Verde Wind'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,

A handwritten signature in black ink, appearing to read 'T. Cote', with a horizontal line extending to the right.

Thomas Cote
CEO
Akua Energy