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Capital Power
1200-10423 101 Street NW
Edmonton, AB T5H 0E9

Monday, April 25, 2022

Public Utility Commission of Texas
PO Box 13326
Austin, TX 78711-3326

RE: Buckthorn Wind Project LLC EOP Submission

Attn: Central Records,

On April 14, 2022, based on information available at the time, Buckthorn Wind Project, LLC submitted its EOP under project number 51840. Since this submission, the Public Utilities Commission of Texas (PUCT) has publicly released a new project number and instructed Buckthorn Wind Project, LLC to resubmit its EOP under the new project number. Please void item #104 in 51840 as the EOP is being resubmitted under file number 53385.

Sincerely,

DocuSigned by:

Angie Andrews

E92DAD9DFC164B6...

Angie Andrews

Compliance Coordinator
10th Floor EPCOR Tower
1200 10423 101 St NW
Edmonton, AB T5H 0E9
T:780-392-5125 E:aandrews@capitalpower.com

Executive Summary

Buckthorn Wind Project, LLC ("Buckthorn") Emergency Site Plan, referred to in this document as the Emergency Operations Plan or "EOP", highlights Buckthorn's planned response to extraordinary emergency / disaster situations associated with natural disasters, human caused events, technological incidents, and security emergencies to ensure the sustained operation of the entity during an emergency situation.

The EOP is a preparedness document – intended to be read, understood, and exercised prior to an emergency. The plan incorporates concepts and principles from the Incident Command System (ICS) into the Buckthorn's emergency operations.

The EOP assigns responsibilities to various business units at Capital Power¹ for coordinating emergency response activities before, during, and after emergency. The plan remains flexible and does not prescribe specific instructions as to how each business unit will respond to an emergency; The event or incident will determine the scope of an emergency and the activating resources necessary to manage it.

Organization of the Emergency Operations Plan

Tex. Admin. Code (TAC) § 25.53 Requirement		Applicable Section in EOP	Applicable Page in EOP
Communication Plan		Section 6.4	12
Pre-identified Supplies for Emergency Response		Appendix A	43
Emergency Staffing ²		Section 6.5	12
Annex	Tornado	Section 6.5.8	22
	Drought	Section 6.5.8	24
	Flooding	Section 6.5.8	23
	Extreme Cold Weather	Section 6.5.13	29
	Extreme Hot Weather	Section 6.5.14	30
	Restoration of Service	Section 7.4	36
	Cyber Security	Separate document being submitted	Separate document being submitted
	Physical Security	Section 6.5.12	28
	Pandemic and Epidemic	Section 7.6	36
	Water Shortage	Not applicable to Buckthorn as a wind-powered generator	
	Hurricane	Not applicable to Buckthorn as the entity is not located within a hurricane evacuation zone ³ as defined by Texas Division of Emergency Management	

Training, Exercising, and Maintenance of the Emergency Operations Plan

¹ A legal owner of Buckthorn Wind Project, LLC ([click](#) to see Capital Power's portfolio)

² The Emergency Staffing plan included in each subsection of the section 6.5

³ Reference: Texas hurricane evacuation zone ([click](#))

Buckthorn's Site Manager is responsible for coordination and scheduling of training and exercising the EOP. Additionally, Buckthorn's Site Manager will prepare, coordinate, publish, and distribute any necessary changes to the plan to the applicable individuals as shown on the distribution list (**also available on page iii of the EOP**).

The EOP will be reviewed regularly to ensure that plan elements are up to date. Each responsible business unit will review and update its portion of the EOP as required based on identified deficiencies experienced in drills, exercises, or actual occurrences and as required by regulations.

Copy #	Name	Title	Type (Electronic/Hard)	Date of Access and Training
1	Aaron Loera	Site Manager	Electronic	1/28/2022
2	Dan Krick	Director, US Renewables	Electronic	03/16/22
3	Energy Management Operation Center (EMOC)	Buckthorn's 24/7 Control Center	Electronic	6/28/21
4	Kristen Coggin	HSE Advisor	Electronic	6/28/21
5	Monica Ho	Operations & Compliance Specialist	Electronic	6/28/2021
6	Sandy Gosselin	CPC Security Advisor	Electronic	6/28/21
7	Chris Lanier	Vestas Site Manager	Electronic	1/28/2022
8	Jesse Jacinto	Vestas Dispatcher	Electronic	1/28/2022
9	Ty Clark	Vestas Technician	Electronic	1/28/2022
10	Caleb Schmidt	Vestas Technician	Electronic	1/28/2022

Emergency Contacts

A list of individuals who can immediately address urgent requests and questions from the commission during an emergency is as followed:

Name	Title	Contact Type	Phone	Email
Aaron Loera	Site Manager	Primary	(325) 219-2160	aloera@capitalpower.com
Scott Yost	Senior Manager, Security & Contingency Planning	Backup	(780) 392-5539	Syost@capitalpower.com
Tanya Creamer	Emergency Management Coordinator	Backup	(403) 437-1128	Tcreamers@capitalpower.com
Dan Krick	Director, US Renewables	Backup	(623) 258-8774	dkrick@capitalpower.com

National Incident Management System Training

A list of individuals below has either completed the following training or will be completing by the date provided:

Name	Title	IS-100	IS-200	IS-700	IS-800
Scott Yost	Senior Manager, Security & Contingency Planning	3/29/2022	3/11/2010	3/24/2022	3/25/2022
Tanya Creamer	Emergency Management Coordinator	5/30/2018	3/7/2019	3/18/2022	3/18/2022
Aaron Loera	Site Manager	06/30/2022	06/30/2022	06/30/2022	06/30/2022

Annual Drill or Activation of the Emergency Operations Plan

Buckthorn had activated the 6.5.8 Severe Weather (Tornado, Earthquake, flood, Drought) section of the EOP in response to tornado on March 21, 2022, therefore, has satisfied the subsection (f) of Tex. Admin. Code (TAC) § 25.53 for the current calendar year, 2022.

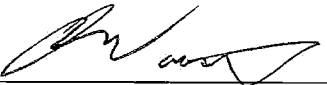
Sworn Attestation

Resource Entity: Buckthorn Wind Project, LLC

I attest that I am the highest-ranking representative, official, or officer with binding authority over the Resource Entity identified above.

I attest that all activities described in Tex. Admin. Code (TAC) § 25.53 have been completed for the above-identified Resource Entity. Further, I attest that the following statements are true and accurate:

- relevant operating personnel are familiar with and have received training on the Emergency Operations Plan and that have received instruction to follow the plan with exception when deviations are required as a result of specific circumstances during the course of an emergency;
- the Emergency Operations Plan has been reviewed by the appropriate Executives;
- minimum of one drill or activation of the Emergency Operations Plan has been conducted to the extent required;
- the Emergency Operations Plan or an appropriate summary has been distributed to local jurisdictions (i.e., PUCT, ERCOT) 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.

Signature: 

Signatory Name: Brian Vaasjo

Title: President and CEO

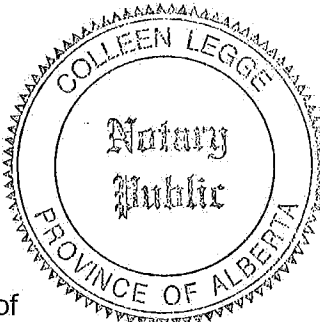
VERIFICATION

Canada)
Province of Alberta)
City of Edmonton)

Subscribed and sworn to before me
this 4th day of April, 2022 in the City of Edmonton
in the Province of Alberta, Canada


Notary Public for the Province of Alberta

Colleen T. Legge
Barrister & Solicitor



My Commission expires at the pleasure of
Her Majesty Queen Elizabeth II

Renewable Operations Buckthorn Wind

Emergency Site Plan

v1.8 (October 05, 2021)



Disclaimer

This document is the property of Capital Power. The contents and procedures outlined within this document are based on the information, corporate resources, and knowledge available at the time of its creation. The document provides guidance to Capital Power on processes and resources available to be implemented during an emergency event. It does not guarantee or endorse performance by the corporation.

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Site Manager Duties & Responsibilities

This Emergency Site Plan is customizable for each Capital Power Renewable Operations site. As Site Manager it is your responsibility to complete the following sections with the correct information for your Renewable Operations site: Document Title, General Site Information, Site-specific TRP (if necessary), Appendix A - Tables 1, 2, 5, 6, 7, 8, Appendix A - Site Emergency Equipment, Appendix B – Site Map, Operations & Maintenance Building Floor Plans, and Substation Layout. These sections are all fillable while the rest of the document is locked.

Site managers are responsible for updating this document's information once a year. Once completed, please upload this Emergency Site Plan to the Renewables SharePoint site. By submitting your site's completed Emergency Site Plan you are acknowledging that you have read and understand all of this document's content.

Emergency Site Plan Distribution, Training and Revision Control

The following have been issued secure electronic and/or hard copies with training complete for on site personnel.

Copy #	Name	Title	Type (Electronic/Hard)	Date of Access and Training
1	Protected Information	Site Manager	Electronic	1/28/2021
2	Protected Information	Director, US Renewables	Electronic	03/16/22
3	Energy Management Operation Center (EMOC)	EMOC	Electronic	6/28/21
4	Protected Information	HSE Advisor	Electronic	6/28/21
5	Protected Information	Operations & Compliance Specialist	Electronic	6/28/2021
6	Protected Information	CPC Security Advisor	Electronic	6/28/21
7	Protected Information	Vestas Site Manager	Electronic	1/28/2022
8	Protected Information	Vestas Dispatcher	Electronic	1/28/2022
9	Protected Information	Vestas Technician	Electronic	1/28/2022
10	Protected Information	Vestas Technician	Electronic	1/28/2022

Revisions to the Emergency Site Plan will be noted in the table below, with revisions completed at the same time being identified by a new Revision # (e.g., v1.0, v1.1). Document revisions will also be controlled via file naming conventions (the version number and new date are updated in the file name). Once finalized, the document will be reviewed annually to reflect any necessary updates.

Revision Control Table				
Revision #	Date	Description of Amendment(s)	Page #	Revised by
1.1	03/04/2019	Updated to include KB1 specific details	Multiple	Protected Information
1.2	06/24/2019	Multiple changes to update TRP's	Multiple	Protected Information
1.3	06/25/2019	Fillable tables, TRP edits, Appendix edits	Multiple	Protected Information

1.4	07/22/2019	Changes to incorporate HSE & Security feedback	Multiple	Protected Information
1.5	07/24/2019	Approved for use at US Renewables	All	Protected Information
1.6	4/13/2021	Updated contact list and distribution list to include Buckthorn	Multiple	Protected Information
1.7	6/28/2021	Updated Maps and Contacts	Multiple	Protected Information
1.8	3/16/22	Updated Protected Information, Director, US Renewables, as secondary contract	Multiple	Protected Information

NOTE TO PUCT: Capital Power has submitted the full IRP to ERCOT, with only sensitive information related to specific systems, 3rd party partners or individual names redacted. Separately, via appropriate forms Capital Power has provided key EOP and Cyber Security contact information to ERCOT.

TABLE OF CONTENTS

Emergency Site Plan Distribution, Training and Revision Control	iii
Glossary & Acronyms	viii
Glossary	viii
Acronyms	ix
Site Information	x
Introduction	xi
1 Authority, Purpose and Scope	1
1.1 Authority	1
1.2 Purpose	1
1.3 Scope and Location	1
2 Organization	2
2.1 Emergency Planning Organization	2
2.2 Wind Farm ESP Roles and Responsibilities	2
Incident Command System (ICS)	4
2.3 Incident Command Post (ICP)	5
2.4 Crisis Management Centre (Edmonton)	5
3 Hazard, Risk, Vulnerability Assessment (HRVA)	6
4 Training and Exercises	7
4.1 Training	7
4.2 Exercising the Plan/Schedule	7
5 Plan Maintenance	9
5.1 Site Status Reports	9
6 Emergency Response	10
6.1 Immediate Actions	10

6.2	Notification	10
6.3	Alarms	12
6.4	Media/Public Information	12
6.5	Tactical Response Procedures (TRPs)	12
6.5.1	Evacuation TRP	14
6.5.2	Shelter-in-place TRP	15
6.5.3	Fire (Structure) TRP	17
6.5.4	Medical Emergency/Fatality TRP	19
6.5.5	Random Act of Violence or Threatening Person TRP	20
6.5.6	Bomb Threat TRP	21
6.5.7	Lightning TRP	22
6.5.8	Severe Weather (Tornado, Earthquake, Flood, Drought) TRP	23
6.5.9	Wind Turbine Rescue TRP	26
6.5.10	Spill – Oil (Containment/Internal) TRP	27
6.5.11	Prolonged Equipment Outage TRP	28
6.5.12	Physical Security TRP	29
6.5.13	Site-specific TRP Extreme Cold Weather	30
6.5.14	Site-specific TRP Extreme Hot Weather	31
6.5.15	Site-specific TRP (Template)	32
6.6	Extreme Weather Checklists	33
6.5.15	Extreme Cold Weather checklist	33
6.5.15	Extreme Hot Weather Checklist	34
7	Recovery	35
7.1	Debriefing (Operational)	35
7.2	Investigation	36
7.3	Critical Incident Stress Debriefing	36
7.4	Resumption of Services	37
7.5	Water Shortage	37
7.6	Pandemic and Epidemic Response	37
	Appendix A—Emergency Phone #s and Resources	39
	Emergency Phone #s	39
	Site Emergency Equipment	45

Appendix B—Maps and Floor Plans	46
Site Map	46
Appendix D — INTIAL INCIDENT INFORMATION FORM	52
Appendix E — POST INCIDENT/exercise DEBRIEF FORM	53
Appendix G — Site Status Report	58
Appendix I — STATUS BOARD INCIDENT INFORMATION	62
Appendix J — STATUS BOARD INJURY DETAILS	63
Appendix K — STATUS BOARD NOTIFICATIONS	64
Appendix L — Status Board Staffing	65
Appendix M — TIME AND EVENT LOG	66

Glossary & Acronyms

Glossary

Crisis – For purposes of this plan, means any internal or external undesirable event that impacts (operationally, financially, reputationally), or can potentially impact, CP.

Crisis Management Centre (CMC) – the location in which the Crisis Management Team positions itself in support of any CP Emergency Site Plan.

Crisis Management Team (CMT) – the CP team that has been given the directive to administer the Emergency Management Program, and activation of the CMC during a crisis and/or implementation of any CP Emergency Site Plan.

Critical Incident Stress Debriefing (CISD) – a specific technique designed to assist others in dealing with the physical or psychological symptoms that are generally associated with trauma exposure.

Disaster – an event that results in serious harm to the safety, health, or welfare of people, or in widespread damage to property.

Emergency – an event, or imminent event, outside the scope of normal operations that requires prompt coordination of resources to protect the health, safety, or welfare of people, or to limit damage to property and the environment.

Emergency Management Program (EMP) – an overall management framework and document that ensures a continuous emergency planning process.

Hazard, Risk, Vulnerability Assessment (HRVA) – a document used on at least an annual basis for an identification and evaluation process that assesses probabilities and consequences of emergencies/disasters (new and previously identified risks). This document is used to assign continuous emergency actions that are used to prevent/mitigate, prepare for, respond to and recover from any emergency/disaster impacting, or potentially impacting, any CP location.

Incident Commander (IC) – the person who has the authority to command and coordinate operations at the site of the emergency.

Incident Command Post (ICP) – the location near the site of the emergency, from which the coordinated control of Emergency Site operations is directed by the IC.

Incident Command System (ICS) – A flexible organization structure and process that enables smooth emergency operations and efficient interaction of responders at an Emergency Site(s).

Incident Management System – an overall flexible organization structure and process designed in accordance with an ICS that provides emergency corporate support and immediate access to senior and executive decision-making authority.

Operational Period – a period of time scheduled for execution of a given set of actions as specified in an ICS Incident Action Plan. Operational periods can be of various lengths, although usually they last 12 to 24 hours.

Acronyms

CISD	Critical Incident Stress Debriefing
CMC	Crisis Management Centre
CMP	Crisis Management Plan
CMT	Crisis Management Team
EMP	Emergency Management Program
ESP	Emergency Site Plan
HRVA	Hazard, Risk, Vulnerability Assessment
IAP	Incident Action Plan
IC	Incident Commander
ICP	Incident Command Post
ICS	Incident Command System
PPE	Personal Protective Equipment
SMS	Safety Management System

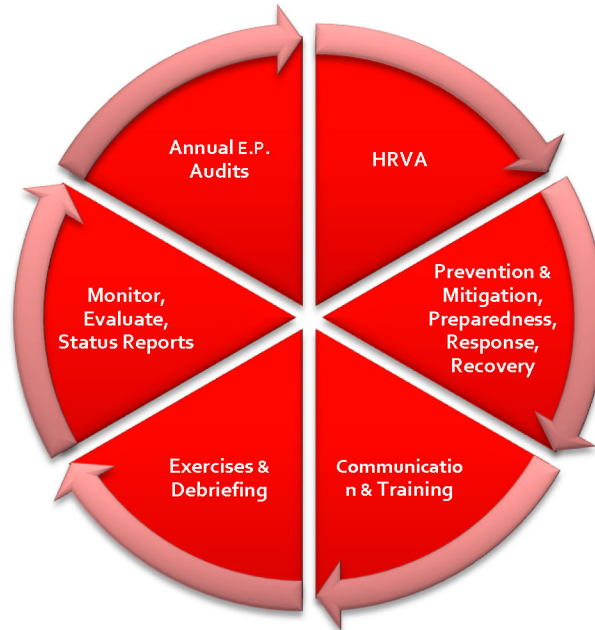
Site Information

General Site Information	Buckthorn Wind Site, 11265 CR109 Mingus, TX 76463-7015
General Site Description	1 buildings at the O&M facility, 26(V126-3.45mw) and 3(V117-3.6mw) total 100.5MW, 1 substation
Staffing Day	1 Capital Power, 3 Vestas
Staffing Night	No night time staffing. For Emergency call EMOC Protected Information, or Buckthorn Manager, Protected Information

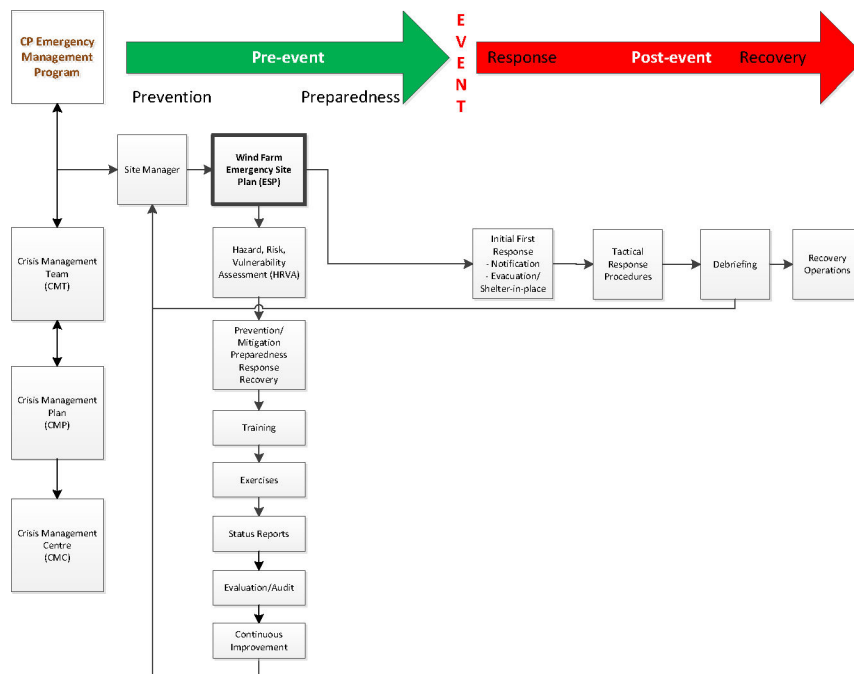
* See Appendix A for applicable phone numbers.

Introduction

This Emergency Site Plan (ESP) is implemented and maintained based on an all-hazards, risk-based vulnerability assessment (HRVA), and is maintained as a continuous emergency planning process, as illustrated below:



This ESP is based on the four interdependent components of emergency management: prevention/mitigation, preparedness, response and recovery, which allows for a comprehensive and integrated approach to emergency management (not just emergency response). The Capital Power (CP) Emergency Management Framework below outlines how we incorporate the four pillars of emergency management into our emergency management planning.



1 Authority, Purpose and Scope

1.1 Authority

This ESP is produced and maintained under the authority of CP's Emergency Management Program. The Site Manager will ensure that resources are provided, and accountabilities are incorporated in the plan. This ESP will be maintained and updated in an effective manner, based on a fundamental principle of continuous improvement and the process as outlined within this plan. It is designed to meet Wind Farm needs, in coordination with corporate, municipal, provincial/state, and federal jurisdictional requirements.

1.2 Purpose

This ESP provides CP with the ability to prevent/mitigate, prepare for, respond to and recover from any emergency/disaster impacting (or potentially impacting) this Wind Farm.

1.3 Scope and Location

This ESP applies internally to any emergency/disaster that impacts (or potentially impacts) this Wind Farm, or its personnel/contractors/visitors.

2 Organization

2.1 Emergency Planning Organization

Coordination and direction of the emergency planning organization at CP Wind Farms are the responsibility of the Site Manager, with assistance from the CP Sr. Advisor – Contingency Planning, and the Sr. HSE Advisor.

2.2 Wind Farm ESP Roles and Responsibilities

Incident Commander (Site Manager or Designate)

1. Coordinate the Site Emergency Management Program;
2. Ensure an effective system of evaluation, update and maintenance for the ESP is in place; and
3. Assume or delegate the role of Incident Commander (IC) in an emergency/disaster.
4. Notify local emergency services (9-1-1);
5. Notify the Energy Management Operations Centre (EMOC);
6. Assess the severity of the emergency/disaster;
7. Establish command;
8. Activate ICS functions, as needed;
9. Develop an Incident Action Plan, with information provided by local emergency services and Field Technicians;
10. Brief support personnel on the situation and plan;
11. Liaise with external emergency services responding to the site;
12. Initiate search and rescue operations for all injured/missing personnel, if required;
13. Ensure safety and security are established and maintained at the emergency site;
14. Provide for initial medical care, evacuation of injured personnel, and identify or designate triage;
15. Work with local emergency services to determine the ALL CLEAR;
16. Confirm the ALL CLEAR with the Field Technician and contracted responders at the emergency site;
17. Document actions and communications on Time and Event Log; and
18. Facilitate debriefing.

See specific Tactical Response Procedures (TRPs) in Section 6.5 for emergency-specific actions to be taken by the Site Manager (or Designate).

Field Technician

1. Assess the incident;
2. Identify immediate hazards;
3. Provide first aid, as required (if trained and safe to do so);
4. Identify impact potential;
5. Secure the incident scene; and
6. Notify the Site Manager.

See specific TRPs for emergency-specific actions to be taken by the Field Technician.

Trained Personnel

1. Respond to the incident site, as requested by the IC (Site Manager, or Designate).
2. Carry out functions as per training and capabilities.
3. Work with local emergency services (fire/police/ambulance).
4. Update the IC on progress, and any issues/concerns that may interfere with response to the emergency/disaster.

Incident Command System (ICS)

Emergency response activities involving this ESP will be based on the ICS model, as a component of our overall Incident Management System. The ICS establishes procedures to control personnel, facilities, equipment and communication under the direction of an IC at an Incident Command Post (ICP) and allows for fluid expansion and contraction of the emergency management organization as the emergency dictates. The ICS functions established at the Emergency Site will be replicated as required at the Crisis Management Centre (CMC – Edmonton).

The system is designed to be flexible and may require personnel to fill multiple roles. Descriptions of responsibilities for the main ICS functions are on the following pages.

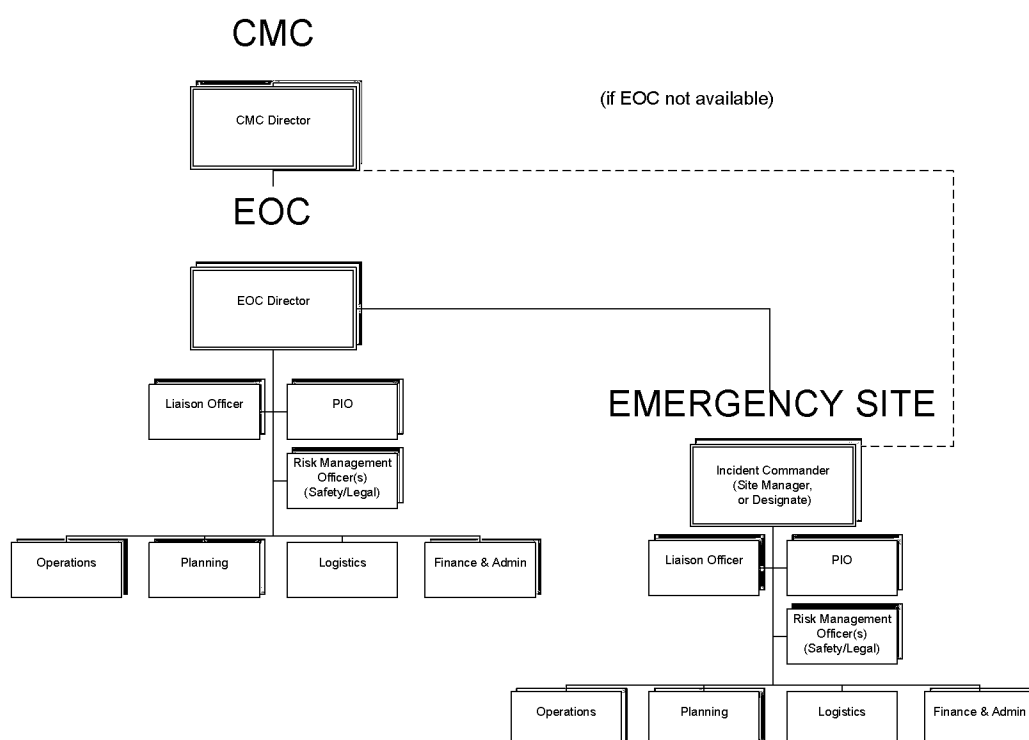


Figure 1—Incident Command System/Incident Management System

2.3 Incident Command Post (ICP)

The ICP is established by the IC as the focal point from which the first response activities, personnel and communications are controlled at the emergency site. The IC will determine the exact location of the ICP, depending on the nature of the emergency/ disaster. The ICP will be situated in a safe location yet will be close enough to permit the IC to be able to manage the emergency effectively and maintain good communications.

The requirements for establishing an ICP are in ICS-training documents (see Section 4.1 Training).

2.4 Crisis Management Centre (Edmonton)

The Crisis Management Centre (CMC) operates from the EPCOR Tower in Edmonton, Alberta, Canada. The CMC may be activated and staffed according to the severity and needs of each unique event.

The Crisis Management Team (CMT) operates from the CMC. Their role is to:

- Communicate directly with the affected site(s);
- Provide a centralized flow of information, support, and direction;
- Provide an accessible venue for decision-makers and engage appropriate support/assets/services both from within and outside the company;
- Coordinate with government and other external agencies, as necessary; and
- Provide a unified source for appropriate external and internal communication.

The requirements for the CMC are located in the separate CP Crisis Management Plan.

3 Hazard, Risk, Vulnerability Assessment (HRVA)

The HRVA (see Appendix F) is to be completed on an annual basis, as coordinated by the Site Manager. The latest completed HRVA is kept by the Site Manager. It provides the fundamental process of identifying hazards (outside of daily workplace hazards as outlined within our Health & Safety program), and assessing the probability of occurrence in correlation with the probable severity, to determine our vulnerabilities. We then prioritize our actions to prevent/mitigate, prepare for, respond to and recover from emergencies that could take place at our facility.

Completion of the risk reduction actions (and related due dates) will be monitored by use of a Status Report (see Section 5.1 - Status Reports).

4 Training and Exercises

4.1 Training

Emergency management and first response training requirements are assessed and planned by the Site Manager. This process is conducted after the HRVA has been completed and roles and responsibilities have been assigned, and the results are forwarded to the appropriate manager for budgeting and scheduling. The following training schedule is reviewed and updated annually.

Training Schedule

Course	Audience	Cycle Period (Yrs.)	Course Length (Hrs.)	Date Planned
ESP Orientation	All Personnel	1	2	Q1
Incident Command System (100 level)	All Site Managers	2	4	Q3
	Sr. Mgr. Renewables	2	4	Q3
	Sr. HSE Advisor	2	4	Q3
Emergency Operation Centre (EOC)	All personnel	2	2	Q1

4.2 Exercising the Plan/Schedule

Exercises are conducted to validate components of this ESP, promote team building and build confidence, not to evaluate individual performance. Personnel responsible for designing and conducting exercises are trained in accordance with the CP Emergency Management Program. The Site Manager will review the mandatory training exercises minimums in Q4 of every year for the following year.

The CP Sr. Advisor, Contingency Planning will inform the Site Manager of the mandatory exercises for each given year. Upon confirmation of desired training with the Site Manager, the Senior Advisor, Contingency Planning will facilitate the appropriate entries into the Computerized Maintenance System.

The following types of exercises will be used:

Exercise Type	Purpose of Exercise	Duration of Exercise (Hrs)	Target Audience	Frequency
ESP Review	Familiarize with ESP, TRPs and amendments	Approx. 1-2	All personnel	Annually
Tabletop	Test ESP, TRPs without deploying resources	Approx. 2-4	All personnel	Annually
Drill	Test single component of ESP, possible deployment of personnel & resources	Approx. 1-4	All personnel	Annually
Coordination	Test ESP with partial or full CMC activation and a simulated site, without deploying resources (other than for communication)	Approx. 4-6	All personnel onsite and local Emergency Response	Every 2 yrs.
Full-scale	Test ESP, deployment of personnel and resources, and TRPs	Approx. 6-8	All personnel onsite and local Emergency Response	Every 2 yrs.

5 Plan Maintenance

5.1 Site Status Reports

A Site Status Report (see Appendix G) will be completed semi-annually, as coordinated by the Site Manager and CP Sr. HSE Advisor, to ensure that prevention/mitigation, preparedness actions are completed (as noted in the HRVA process – see Section 3). The report will be submitted to the CP Sr. Advisor Contingency Planning.

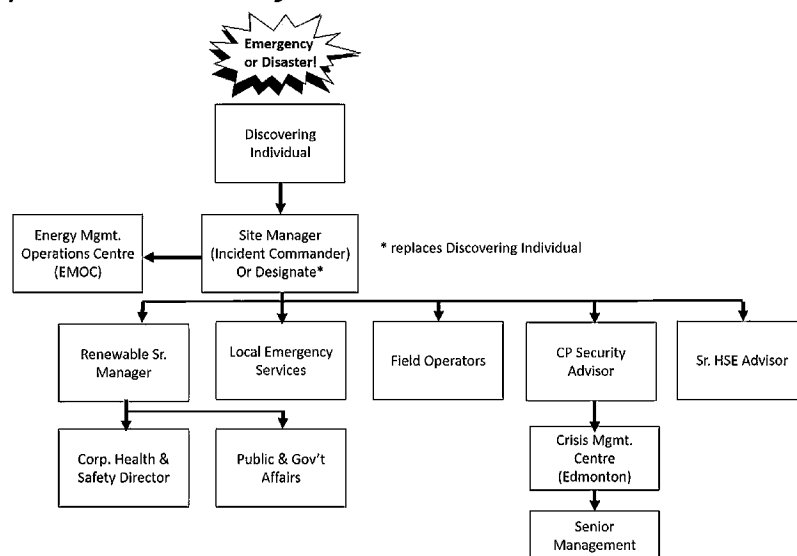
6 Emergency Response

6.1 Immediate Actions

Any individual who discovers an emergency/disaster situation is required to follow the procedures as outlined in the applicable TRP, and complete the Initial Incident Information form (see Appendix D).

6.2 Notification

Specific notification requirements are located within each TRP, and contact information is located in Appendix A. Internal Notification Flowchart:



The Senior Vice President of Operations, Engineering & Construction MUST BE NOTIFIED by plant management under the following conditions:

Health & Safety	<ol style="list-style-type: none"> 1. Permanent Total Disability or a Fatality – from a localized incident (e.g., tank rupture, scaffold collapse, pressure vessel rupture) or occupational illness. Irreversible health damage with serious disability or death (e.g., corrosive burns, loss of limbs.) 2. A severe weather event that receives major media attention. 3. A major environmental release or plant fire that causes the evacuation of plant workers and local community residents.
Environmental	<ol style="list-style-type: none"> 1. Massive effect – persistent or severe environmental damage. Loss of commercial use resulting in major financial consequences for the company. Ongoing breaches well above prescribed limits.

Reputation	<ol style="list-style-type: none"> 1. National or Province/State impact – National or Province/State public concern. Extensive adverse attention in the National/Provincial/State media. Effect on National/Provincial/State policies with potentially restrictive measures and/or impact on grant of licenses. Mobilization of action groups. Loss of customers and/or a significant customer.
Security	<ol style="list-style-type: none"> 1. The deliberate discharge of explosives or firearms at a Capital Power facility, intended to harm personnel or the public. 2. An act of terrorism at a Capital Power facility. 3. Commencement of any criminal or quasi-criminal investigation or enforcement proceeding against the company.
Production Loss	<ol style="list-style-type: none"> 1. Forced outage that has a material impact of greater than \$10,000,000. 2. Equipment damage of greater than \$10,000,000.

The following worker notification protocols will be used during an emergency/disaster.

Call Out to Site

If there is a need for a call out of off-duty employees during an emergency/disaster, the Site Manager (or Designate) will initiate a call out to arrange for additional crews as may be needed.

Call In to Site

When employees (not at site) become aware of an emergency/disaster that may affect their CP worksite, they are to refrain from contacting their work location. Employees will be contacted and called in to site only if they are needed.

Replacement Personnel

The CP IC will ensure that plans are in place to support the wellbeing of all CP personnel on site, as people tend to work beyond their normal capacities under very stressful conditions, and may not recognize or acknowledge their own fatigue. Workers will be monitored, and suitable replacements will be notified and prepared to take over work assignments as needed.

Family Communication

It is important for responding employees to know that their families are safe, and for families to know the employees are safe. The Sr. Manager Renewables will call Media Relations and provide information for families. ONLY Media Relations is to discuss information with families.

6.3 Alarms

The EMOC monitors, through the SCADA system, the status of the Wind Turbine Generators. When there is unusual activity, EMOC contacts the site (e.g., Site Manager or IC) as required.

Fire alarms are activated by detectors. These alarms will be tested on an annual basis to ensure proper working order.

6.4 Media/Public Information

During or following an emergency/disaster at the site, media may call the facility or arrive at the site looking for information or a statement pertaining to the emergency/disaster. CP employees are not to communicate with the media; however, exceptions may be made with the guidance and direction of Media Relations.

If contacted by the media, employees are to **refer them to the media relations and communications manager or the CP after-hours media relations contact (see Appendix A).**

6.5 Tactical Response Procedures (TRPs)

The following provisions were not included in the TRPs as they are N/A to Buckthorn as a wind generator: Water shortage, fuel switching capability, fuel supplier. Hurricane annex also not included as Buckthorn Wind is not located in the hurricane evacuation zone according to the most recent information provided by Texas Division of Emergency Management (TDEM)

6.5.1	Evacuation TRP	14
6.5.2	Shelter-in-place TRP	15
6.5.3	Fire (Structure) TRP	16
6.5.4	Medical Emergency/Fatality TRP	18
6.5.5	Random Act of Violence or Threatening Person TRP	19
6.5.6	Bomb Threat TRP	20
6.5.7	Lightning TRP	21
6.5.8	Severe Weather (Tornado, Earthquake, Flood) TRP	22
6.5.9	Wind Turbine Rescue TRP	25
6.5.10	Spill – Oil (Containment/Internal) TRP	26
6.5.11	Prolonged Equipment Outage TRP	27
6.5.12	Sabotage TRP	28
6.5.13	Extreme Cold Weather TRP	29
6.5.14	Extreme Hot Weather TRP	30
6.5.15	Site-specific TRP (Template)	31

6.5.1 Evacuation TRP

This Evacuation TRP is to be referenced in conjunction with the TRP for the applicable emergency/disaster, where specific additional actions and notification guidelines are located.

For all evacuation decisions, the protection of human life will remain paramount above all other considerations. The decision whether to evacuate will be based upon:

- How the threat will affect (or potentially affect) the safety of personnel and/or the structural integrity and operations of the facility; and
- The areas of the facility that need to be evacuated.

All personnel (and visitors) must be aware of alarm systems, evacuation routes and muster points (e.g., via ESP Orientation, signage). The Site Manager (or Designate) will activate evacuation of the facility.

Site Manager/Incident Commander MUST

1. Establish contact with the all personnel on-site.
2. Report to the incident site, if required.
3. Assume the role of IC and integrate actions with local authority (Fire/Police/Ambulance).
4. Determine the type of emergency and if external assistance is required.
5. Ensure all notification requirements (as per the applicable TRP) are completed.
6. Alert all workers / visitors at site (e.g., via radio and/or face-to-face communication).
7. Advise workers / visitors about the nearest and safest muster point.
8. Ensure personnel and visitors use the stairs during an evacuation – **NOT** an elevator.
9. Designate personnel to meet at alternate location to assist or shutdown site, as necessary.
10. Perform a head count once everyone has evacuated.
11. Call 9-1-1 if necessary.
12. Assign an employee to meet and direct local emergency services to site of emergency.
13. Arrange for transportation of evacuated workers, if required.
14. **NOT** allow any non-emergency vehicles to the incident site. Arrange to restrict non-emergency vehicle access to site (e.g., traffic cones, hazard tape).
15. Maintain communication with the IC (or Police/Fire).
16. Complete Incident Log (See Appendix D).
17. Collect Incident Logs and facilitate post-emergency operational debriefing and report, as appropriate.

6.5.2 Shelter-in-place TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Site Manager	EMOC	Immediately	In Person/Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	As required	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	As required	Phone/Email

This Shelter-in-place TRP is to be referenced in conjunction with the TRP for the applicable emergency/disaster, where specific additional actions and notification guidelines are located.

The decision whether to shelter-in-place will be based upon:

- How the threat will affect (or potentially affect) the safety of personnel and/or the structural integrity and operations of the facility; and
- The areas of the facility that need to be sheltered-in-place.

All Personnel MUST

All personnel (and visitors) will be informed of a shelter-in-place situation (e.g., via radio, cell phone, and/or face-to-face communication), and MUST:

1. Close doors.
2. **NOT** leave the facility for any reason until they are informed by the first responder in charge or by the CP IC that it is safe to do so.

In extreme circumstances – such as an approaching tornado – Site Manager or Designate will notify staff of a pending tornado (e.g., via radio, cell phone and/or face-to-face communication). In this event all personnel MUST:

1. Take precautionary measures by moving away from windows toward the center of the building.
2. Await further instructions (e.g., via radio, cell phone and/or face-to-face communication).
3. If instructed to, move to a stairwell, or other secure inner location, if the threat is immediate.
4. Minimize talking (or using a cell phone) during shelter-in-place, as further instructions may be given, and building occupants need to listen.
5. **NOT** leave the shelter-in-place location until the “All Clear” has been provided from Fire/Police or CP IC.

Trained Personnel MUST

1. Assist those with a mobility or other hindrance.
2. Complete a head count at the secure inner location.
3. Maintain communication with first responders, if able and safe to do so.

Site Manager MUST

1. Establish contact with all personnel.
2. Report to the incident site, if required.
3. Begin roles and responsibilities of IC and integrate actions with local authority (Fire/Police).
4. Ensure all notification requirements (as per the applicable TRP) are completed.
5. Complete Incident Logs and facilitate post emergency, operational debriefing and report, as appropriate.

6.5.3 Fire (Structure) TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Person Discovering Fire	Local Fire Department	Immediately	9-1-1
Person Discovering Fire	Site Manager	Immediately	In Person/Phone
Site Manager	EMOC	Immediately	In Person/Phone
Site Manager	Senior Manager Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	As required	Phone/Email

Person Discovering the Fire MUST

1. Activate fire alarm (if sensor has not yet activated the alarm).
2. Shout "Fire" to notify others.
3. Attempt to extinguish the fire using on site resources (if trained and safe to do so).
4. For electrical fires: first isolate the fault by opening the breaker(s), if trained and safe to do so, and then attempt to extinguish fires using a fire extinguisher.
5. Leave the building by following the Evacuation TRP.

Trained Personnel MUST

In addition to ensuring the above has been done:

1. Stop and de-energize the equipment, if trained and safe to do so.
2. Contact all visitors and/or contractors on site. Advise them of the fire condition and location.
3. Coordinate evacuation, as per Evacuation TRP.
4. Once the Fire Department has arrived on site, communicate clearly with them regarding hazards unique to this site (e.g., power lines, other electrical equipment, toxic chemicals on site).

Fire (Structure) TRP cont'd

Site Manager MUST

In addition to ensuring the above has been done:

1. Establish contact with the all personnel and direct them to site muster point.
2. Report to the incident site, if required.
3. Begin roles and responsibilities of IC and integrate actions with local authority (Fire/Police).
4. Be aware of the risk to local residences/structures downwind of the fire. Smoke may travel a long distance, depending on wind conditions.
5. Ensure all notification requirements (as per the notification matrix) are completed.
6. Coordinate the clean up of all contaminants, soot, water and cleaning material if trained and safe to do so. Dispose of contaminated waste using approved procedures.
7. Collect Incident Logs and facilitate post emergency, operational debriefing and report, as appropriate.

6.5.4 Medical Emergency/Fatality TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Immediately	In Person/Phone
Site Manager	9-1-1, if required	Immediately	Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations *	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager, Loss Prevention	Immediately	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	Immediately	Phone/Email

* Additional corporate and government authority notifications will fan out from here.

Note: Police are responsible for notification of next of kin.

Witness(es) MUST

1. Alert nearest First Aid Attendant.
2. Assist with obtaining first aid and emergency medical transportation equipment, and/or AED.

First Aid Attendant MUST

1. Ensure 9-1-1 has been called.
2. Obtain first aid and emergency medical transportation equipment, and/or AED, if not already done.
3. Respond to request for emergency medical assistance, if trained and safe to do so.
4. Arrange for a specified person to meet EMS at the entrance and direct them to the scene.

Field Technician MUST

In addition to ensuring the above has been done:

1. Ensure the Site Manager has been alerted.
2. Assist in the provision of first aid, crowd control, and internal notification, as required.
3. Complete rescues (e.g., high angle or restricted space) as required.
4. Complete Initial Incident Information Form (see Appendix D).

Site Manager (or Designate) MUST

In addition to ensuring the above has been done:

1. Assume control at emergency scene, until relieved by more qualified professional.
2. Refer all Media to the refer them to the media relations & communications manager at **1-587-341-2556** or the CP after-hours media relations contact at **1-780-392-5234**.
3. Collect Incident Logs & facilitate post emergency, operational debriefing & report, as appropriate.

6.5.5 Random Act of Violence or Threatening Person TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Employee Experiencing Situation	9-1-1	Immediately	Phone
Employee Experiencing Situation	Site Manager	Immediately	In Person/Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Security Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Human Resources Labour Relations	As Required	Phone/Email
Sr. Mgr. Renewables	Legal Counsel	As Required	Phone/Email

Employee Experiencing the Situation MUST

1. Inform the individual that their behaviour or language is inappropriate and request that they discontinue.
2. Use non-physical skills to de-escalate a potentially violent confrontation.
3. Remove themselves from the confrontation at the first opportunity, if de-escalation fails.
4. **NOT** put themselves at risk by intervening in an act of workplace violence.
5. **NOT** return to the incident location and re-confront the individual involved.
6. Provide an accurate description to Security (hair colour, eye colour, beard/moustache, clothing, age, nationality, any distinguishing features).

Site Manager (or Designate) MUST

In addition to ensuring the above has been done:

1. Report to the incident site, if required.
2. Begin roles and responsibilities of IC and integrate actions with local authority (Fire/Police).
3. Determine immediate risk.
4. Inform and remove other personnel from the area, if necessary.
5. Take appropriate non-physical action to de-escalate the situation.
6. Coordinate an incident investigation after the situation is resolved.
7. Facilitate post emergency, operational debriefing and report, as appropriate.

6.5.6 Bomb Threat TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Call Receiver	9-1-1	Immediately after receiving the threat	Phone
Call Receiver	Site Manager	Immediately after receiving the threat	In Person/Phone
Site Manager	Security Advisor	Immediately	Phone/Email
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	Immediately	Phone/Email

Person Receiving Bomb Threat MUST

1. **NOT** sound the fire alarm.
2. Listen, remain calm and courteous.
3. **NOT** interrupt the caller.
4. Obtain as much information as possible – keep the caller talking.
5. **NOT** hang up.
6. Complete the Bomb Threat Form (see Appendix H). Write down as much detail as possible and be prepared to discuss it with Security and the Police.

Site Manager MUST

In addition to ensuring the above has been done:

1. Inform the Security Advisor (initiate a trace on the call, if possible).
2. In consultation with Police, prepare for a coordinated search and/or possible building evacuation (see Evacuation TRP).
3. Based on advice from the Security Advisor, shut down and isolate the facility, if appropriate.
4. Ensure that any media present are NOT allowed on site without Media Relations' or Site Manager (or Designate) approval, and have media wait under Security supervision until the Site Manager (or Designate) arrives.
5. Coordinate an incident investigation after the situation is resolved.
6. Facilitate post emergency, operational debriefing and report, as appropriate.

All Personnel MUST

1. Watch for suspicious or unfamiliar packages in their work area and limit radio and cell phone use.
2. **NOT** touch or move any suspicious package.

6.5.7 Lightning TRP

This Lightning TRP is to be referenced in conjunction with the Shelter-in-place TRP.

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Any Worker	Supervisor	Immediately	In Person/Phone
Site Manager	All Staff	Immediately	In Person/Phone
Site Manager	Director US Renewables, if necessary	As needed	Phone/Email
Site Manager	Senior HSE Advisor, if necessary	As needed	Phone/Email

The following 60/30 guideline will be used when it becomes necessary to seek shelter-in-place due to an approaching lightning storm.

When lightning is within an approximate 60-mile radius, all personnel must be notified of the approaching storm. Personnel up tower must stop work activity (safely) and proceed to exit the tower.

Work activity will be suspended, and personnel will be responsible to seek shelter-in-place (O&M building, office trailers, vehicles) when lightning is approximately 30 miles or less.

All Trained Personnel MUST

1. Ensure work teams carry a cell phone or radio. Weather warnings will be programmed to send warnings via cell / text / email.
2. Suspend work activity, as per the 60/30 guideline above.
3. Shut down any mobile equipment, and isolate any gas operated equipment (e.g., welding/cutting torches).
4. Secure all loose materials, in case of strong winds/storm gusts.
5. **NOT** re-enter the work site until the "ALL CLEAR" has been announced by the Site Manager (or Designate).

Site Manager (or Designate) MUST

In addition to ensuring the above has been done:

1. Remove crews from the worksite and have them proceed to the designated shelter.
2. Ensure all personnel are accounted for (distribute head count sheets to those who will perform the count).
3. Contact emergency services for assistance (in the event of a strike resulting in injuries).
4. Provide the "ALL CLEAR" signal when appropriate.
5. Facilitate post emergency, operational debriefing and report, as appropriate.

6.5.8 Severe Weather (Tornado, Earthquake, Flood, Drought) TRP

This Severe Weather Event TRP is to be referenced in conjunction with the Evacuation (6.5.1) or Shelter-in-place (6.5.2) TRPs, as applicable.

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Site Manager	EMOC	Immediately	Phone
Any Worker	9-1-1	Immediately, to report any injuries or trapped personnel	Phone/Radio
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	Immediately	Phone/Email

NOTE: Weather warnings are programmed to send alerts to cell phones via email and text.

Tornado

All Personnel MUST

For a Tornado WATCH:

1. Watch for signs of a tornado (dark greenish skies, hail, funnel cloud).
2. Be alert to changing weather conditions
3. Listen to a battery-powered weather radio (if the power is out), regular radio, cell phone, or television for updated information.

For a Tornado WARNING:

1. Immediately comply with Shelter-in-place TRP.
2. Limit phone use to emergency calls only.

Post Tornado event:

1. Conduct hazard/damage assessments.
2. Put safeguard controls in place to protect all personnel on site.
3. Help injured or trapped personnel, if safe to do so.

4. Continue listening to radio or television for updated information

Earthquake

All Personnel MUST

During an Earthquake:

1. Stay clear of windows
2. **Drop, Cover, then Hold On.** Drop to your hands and knees. Cover your head and neck with your arms. Hold on to any sturdy furniture until the shaking stops. Crawl only if you can reach better cover without going through an area with more debris.
3. You are safe in the turbine during an earthquake. Do **NOT** use the ladder at this time.
4. If inside, stay there until the shaking stops. Do **NOT** run outside

After an Earthquake:

1. Expect aftershocks to follow the largest shock of an earthquake.
2. Check yourself for injury and assist others if you have training.
3. If in a turbine or building, go outside and quickly move away from the structure
4. Do **NOT** go underneath power lines after an earthquake.
5. Do **NOT** enter damaged structures.
6. If you are trapped, cover your mouth. Send a text, bang on a pipe or wall, or use a whistle instead of shouting so that rescuers can locate you.
7. If possible, employees shall make safe any equipment being worked on and meet at the designated muster point.
8. Once safe, monitor local news reports via battery operated radio, TV, Social media, and cell phone text alerts for emergency information and instructions.

Site Manager MUST

1. Ensure all personnel are accounted for (distribute head count sheets to those who will perform the count).
2. Contact emergency services for assistance.
3. Facilitate post emergency, operational debriefing and report, as appropriate.

Flood

All Personnel MUST

1. Contact your Site Manager.
2. Stop work immediately, alert all others present, and if time permits, place equipment in a safe position on an upper floor.
3. Turn off utilities at the main switches or valves, if instructed to do so. Start by disconnecting electrical appliances but do **NOT** touch electrical equipment if you are wet or standing in water.
4. Muster at the designated shelter and take extreme caution while travelling on flooded roads.
5. Drive at a moderate speed and monitor other vehicles around you. If your vehicle stalls in a water, abandon the vehicle and move to higher ground if safe and possible. Turn on emergency flashers and do not return to your vehicle until it is safe to do so.
6. **NOT** attempt to cross a stream where water is above your knees.

7. **NOT** try to drive over a flooded road. The water can be much deeper than it appears and you could be stranded or trapped.
8. Stay away from drains and ditches that may have the opportunity to collapse.
9. When driving into areas where flash floods are possible, inform someone of your itinerary and expected time of return. Stick with you plan, and check in when you return.

Site Manager MUST

1. Stay current with weather conditions; listen to the radio or check in via internet for current information in your area and keep site personnel informed.
2. Remove crews from the worksite and have them proceed to the designated shelter.
3. Ensure all personnel are accounted for (distribute head count sheets to those who will perform the count).
4. Contact emergency services for assistance (in the event of severe flooding).
5. Be prepared to follow evacuation TRP protocol.
6. Facilitate post emergency, operational debriefing and report, as appropriate.

Drought

Note: Buckthorn Wind Facility is on a drilled water well.

All Personnel MUST

1. Conserve water usage.
2. Wash work trucks only as needed.

Site Manager MUST

1. Encourage conservative water use on site.
2. Post signs in restrooms reminding everyone about limited use of water.
3. Make sure faucets are have a water limiter (rubber o-ring) installed.
4. If we run out of water have a plan to buy a water tank and pump for the site. Companies like nationwide tank and pipe provide external tank solutions and they are local to Texas. Nationwidetankandpipe.com

6.5.9 Wind Turbine Rescue TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification?	Who Is Notified?	When?	Form of Notification?
Technician	9-1-1, if major emergency	Immediately	Phone
Technician	Site Manager	Immediately	Phone
Site Manager	9-1-1, if necessary	Immediately	Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email

Uptower Emergency Rescue Personnel (technician) MUST

1. Locate personnel Emergency Rescue Device.
2. Ensure the scene is safe (perimeter around the base of the tower is clear, no falling objects, thru traffic has been blocked by barricades).
3. Have Operator arrange for a standby person with a radio to be present at the base of the tower.
4. Get and use PPE.
5. Attempt a non-ascending rescue, if appropriate. If person is stranded on ladder or platform due to fright, use coaching skills to help person come back down the ladder.
6. Select the exit best suited for rescue.
7. Prepare Rescue Device and connect to anchor point (painted in yellow).
8. Ensure patient and rescuer harnesses are on properly.
9. Position patient for ease of extraction near exit.
10. Attach Rescue Device to patient.
11. Make sure all rescuers are tied off.
12. Open exit hatch and ensure clear rescue path.
13. Lower patient to ground level.
14. Administer first aid to the patient, if necessary.
15. Complete an Initial Incident Information Form.

6.5.10 Spill - Oil (Containment/Internal) TRP

Any spill, release or emergency that may cause, is causing or has caused an adverse effect to the environment must be reported immediately to the environmental regulating organization. Even if it is believed that no adverse effect has occurred, the government agency needs to be consulted promptly with an information call, allowing the agency to make the decision as to whether this is a reportable or non-reportable incident.

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Person Discovering the Spill/Field Technician	Site Manager (or Designate)	Immediately	In Person/Phone
Site Manager	EMOC	Immediately	Phone
Site Manager (or Designate)	Local Cleanup Contractor	If external resources required	Phone
Site Manager	Sr. Environmental Advisor	Immediately	Phone/Email
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor, if necessary	Immediately	Phone/Email

Note: All media are to be restricted from the site, and are to contact CP Public Affairs Department for information.

Person Discovering the Spill MUST

1. Identify where the oil leak or spill is (e.g., on the ground, on the tower, inside or outside, in the nacelle).
2. Estimate the quantity, if possible.
3. Review substance SDS before attempting to contain, if possible.

All Personnel MUST

In addition to ensuring the above has been done:

1. If possible, stop oil from reaching soil, waterways, field tiles etc. **Every effort must be made to minimize the amount of oil entering a river, watershed or groundwater.**
2. Remove any piece of equipment that is leaking oil from service as quickly as practicable.
3. Contain the spill using absorbent material from the emergency supply located in Spill Kit Storage Location.
4. Place oil absorbent material over and around remaining oil. Use boom type oil absorbent material to help absorb the oil and prevent any further contamination.
5. Document the time; date; location; substance spilled; estimated quantity spilled; duration of spill or rate of release; reason for spill; actions being taken to contain, clean up, and prevent further spills; and other pertinent information as required.

6.5.11 Prolonged Equipment Outage TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Immediately	In Person/Phone
Site Manager	9-1-1	Immediately	Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	Immediately	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	Immediately	Phone/Email

Field Technician MUST

1. Stop, de-energize and isolate the equipment, if trained and safe to do so.
2. Contact all visitors and/or contractors on site. Advise them of the equipment outage condition and location.

Site Manager MUST

In addition to ensuring the above has been done:

1. Ensure equipment is properly isolated
2. Apply Lock Out Tag Out procedure defined by CP policy
3. Ensure access to equipment is restricted and contact information is posted on a visible notice

6.5.12 Physical Security TRP

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Immediately	In Person/Phone
Site Manager	Director US Renewables	Immediately	Phone/Email
Site Manager	Senior HSE Advisor	Immediately	Phone/Email
Site Manager	Security & Contingency Planning	Immediately	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Immediately	Phone/Email
Sr. Mgr. Renewables	Manager Loss Prevention	Immediately	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	Immediately	Phone/Email

All Personnel MUST

1. In case of sabotage or suspicious activity, contact your Site Manager and report the location of the activity. If an immediate threat exists, contact 911 directly.
2. Do not confront trespassers or attempt to intervene with suspicious activities.
3. If suspicious individuals seem hostile or violent, employees shall leave the area and inform the Site Manager.
4. Once it is safe to do so, complete the Accident / Incident Report and submit through Maximo incident reporting system.

Site Manager MUST

In addition to ensuring the above has been done:

1. Call 9-1-1 when alerted to suspicious activity.
2. Report the occurrence to the Crisis Management Team (CMT) and HSE if sabotage occurs at generating units, transmission facilities, electric collection systems, the operational telecommunication, or control devices associated with generating units, transmission facilities, or electric collection system. Should also be reported through the Integrity Hotline if incident involves company personnel.

6.5.13 Site-specific TRP Extreme Cold Weather

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Immediately	In Person/Phone
Site Manager	9-1-1	As needed	Phone
Site Manager	Director US Renewables	As needed	Phone/Email
Site Manager	Senior HSE Advisor	As needed	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	As needed	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	As needed	Phone/Email

All Personnel MUST

1. Notify Site Manager of extreme cold weather
2. Monitor extreme weather storms throughout the entire workday.
3. Clear and consistent communication via cell phone or site radio.
4. Practice safe driving at all times during extreme weather and only drive as needed. Confirm tire tread on vehicles are adequate for extreme weather, along with the proper tire (all terrain or snow).
5. Dress in warm clothing.

Field Technician MUST

In addition to ensuring the above has been done:

1. Notify Site Manager of extreme cold weather 32 degrees Fahrenheit or below.
2. Know the symptoms of cold stress, reddening skin, tingling, pain, swelling, leg cramps, numbness, and blisters.
3. Dress properly; wear at least 2-3 layers of warm clothing; insulated gloves and boots, and cover your head.
4. Monitor your physical condition and that of your co-workers.
5. Drink warm plenty of liquids.

Site Manager MUST

In addition to ensuring the above has been done:

1. Complete extreme weather response checklist 6.6.1 as needed
2. Stay alert by monitoring weather in the area using multiple weather sources.
3. Keep in stock cold weather kits for each vehicle (hand warmers and emergency blanket)
4. Confirm all work trucks have proper tires and are in proper working condition.
5. Keep clear and consistent communication with everyone on site with updates and check-ins.

6.5.14 Site-specific TRP Extreme Hot Weather

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Immediately	In Person/Phone
Site Manager	9-1-1	As Needed	Phone
Site Manager	Director US Renewables	As Needed	Phone/Email
Site Manager	Senior HSE Advisor	As Needed	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	As Needed	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	As Needed	Phone/Email

All Personnel MUST

1. Notify Site Manager of extreme heat weather
2. Drink plenty of water and have extra water in stock.
3. Review OSHA heat stress calculator and determine if work is safe.
4. Review and understand signs and symptoms of heat stroke, heat exhaustion, heat cramps, heat rashes, and heat fatigue.

Field Technician MUST

In addition to ensuring the above has been done:

1. Drink plenty of water.
2. Dress in cooler clothing (wear FR clothing as needed).
3. Click or tap here to enter text.
4. Monitor your physical condition and that of your co-workers.
5. Take 15 min water breaks every hour

Site Manager MUST

In addition to ensuring the above has been done:

1. Encourage water breaks every hour for workers.
2. Keep in stock extra water.
3. Maintain a stock of hydration water packets and keep in a general area.
4. If applicable: change ice machine water filter annually or as needed.
5. Monitor your physical condition and that of your co-workers.

6.5.15 Site-specific TRP (Template)

Notification Matrix (See Appendix A for Contact #s)

Who Does Notification	Who Is Notified	When	Form of Notification
Field Technician	Site Manager	Click or tap here to enter text.	In Person/Phone
Site Manager	9-1-1	Click or tap here to enter text.	Phone
Site Manager	Director US Renewables	Click or tap here to enter text.	Phone/Email
Site Manager	Senior HSE Advisor	Click or tap here to enter text.	Phone/Email
Sr. Mgr. Renewables	Vice President Operations	Click or tap here to enter text.	Phone/Email
Sr. Mgr. Renewables	Public & Government Affairs	Click or tap here to enter text.	Phone/Email

All Personnel MUST

1. Click or tap here to enter text.
2. Click or tap here to enter text.
3. Click or tap here to enter text.
4. Click or tap here to enter text.
5. Click or tap here to enter text.

Field Technician MUST

In addition to ensuring the above has been done:

1. Click or tap here to enter text.
2. Click or tap here to enter text.
3. Click or tap here to enter text.
4. Click or tap here to enter text.
5. Click or tap here to enter text.

Site Manager MUST

In addition to ensuring the above has been done:

1. Click or tap here to enter text.
2. Click or tap here to enter text.
3. Click or tap here to enter text.
4. Click or tap here to enter text.
5. Click or tap here to enter text.

6.6 Extreme Weather Checklists

6.6.1 Extreme Weather Response Checklist-Cold Weather

TimelineResponsibility		Description of Task
T-24	Site Manager	Verify that all outside lights are operational at the O&M Building and substation
T-24	Site Manager	Verify that the site portable heater(s) are operational
T-24	Site Manager	Adjust heating system thermostats and verify heaters active in Substation
T-24	Site Manager	Spread Ice Melt on sidewalks and site roads
T-24	Site Manager	Fuel vehicles and fill fuel and fluid to full capacity
T-24	Site Manager	Put winter tires on the service vehicle
T-24	Site Manager	Ensure emergency supplies are available in the service vehicle
T-24	Site Manager	Ensure batteries are fully charged on all communication devices, replace non-rechargeable batteries as needed
T-24	Site Manager	Shovel snow off sidewalks
T-24	Site Manager	Check turbines for icing
T	Site Manager	Notify Regulators of operational deficiencies
T+72	Site Manager	Arrange for plow or grader to clean snow off site roads

6.6.2 Extreme Weather Response Checklist-Hot Weather

TimelineResponsibility		Description of Task
T-24	Site Manager	Check vehicle gas or fluid levels and top off as needed
T-24	Site Manager	Check for adequate levels of drinkable water
T-24	Site Manager	Inspect towers, substation and O&M building for signs of fire
T	Site Manager	Monitor for signs of heat exhaustion or heat stroke

7 Recovery

Post emergency/disaster recovery activities will be initiated as soon as possible, preferably while response operations are still underway. Actions taken during response operations need to be decided with post incident recovery in mind. Examples of recovery operations include:

- Repair of damaged property and infrastructure
- Restoration of utilities and communications
- Internal and external investigations
- Debriefing and counselling services

7.1 Debriefing (Operational)

The Site Manager (or Designate) is required to coordinate in-house debriefings as soon as practical after any exercise or actual emergency/disaster affecting operations. An action plan must be produced, indicating changes (as may be applicable) to improve emergency planning.

Debriefings are used to determine the effectiveness of the ESP, and to identify opportunities for improvement. They are to be conducted in a constructive, open-minded and confidential manner, in which blame is not affixed to any individuals or organizations. All debriefings will be conducted as outlined in the CP Emergency Management Program and will include:

- The appointment of a debriefing coordinator (e.g., Safety Consultant or designate)
- Adequate notice of a debriefing to all applicable parties
- Suitable location & equipment (e.g., flipchart/screen, laptop, comfortable, private from media)
- Confirmation of confidentiality
- Agenda of emergency planning and response objectives to be examined
- Action plan to record observations and recommendations (including specific activities that worked well) of debriefing
- Assurance that all applicable parties will be notified of the follow up action resulting from the debriefing

The primary objective of a debriefing (not pertaining to Critical Incident Stress Debriefing) is to learn from an emergency response experience, real or simulated, and make changes to emergency plans, if applicable, to improve future emergency preparedness.

External Debriefings

All employees that are requested to attend an exercise or actual emergency debriefing to be coordinated by an outside organization must obtain approval from the Site Manager. Approval will be based on an assurance that the outside debriefing will be conducted in the same manner as CP internal debriefings. Notification of attendance must also be given to Corporate Relations.

7.2 Investigation

General

In every emergency/disaster involving a fatality, serious injury and/or loss or significant damage to CP property, corporate officials will either assist with or take charge of the incident investigation. **Particular care must be exercised to ensure that all information/circumstances are preserved in their original state.** Where loss or damage to CP property or loss of revenue has occurred, material must not be disturbed until permission has been received from the corporate claims adjuster, the CP insurance adjuster and/or any government agencies involved. The CP Senior Health & Safety Advisor must be contacted prior to involving any outside agencies.

Serious Injury/Fatality

Following an emergency/disaster where a fatality or a serious injury has occurred, government agency representatives will carry out an investigation into the injury/fatality. Work at the scene of the injury/fatality will not be resumed until permission has been obtained from the coroner's service, the police or government authorities.

Insurance and Government Investigations

Insurance companies and government agencies may wish to conduct investigations of their own into an emergency/disaster. They must be accompanied on site by either the CP Senior Health & Safety Advisor or the Site Manager.

7.3 Critical Incident Stress Debriefing

Employees affected by an incident may experience delayed and/or long-term reactions including real or perceived loss of employment due to the destruction of company property, and critical incident stress. Critical Incident Stress Debriefings (CISD) will be arranged after an emergency/disaster. Capital Power's Employee and Family Assistance Plan (EFAP) allows employees and family members access to confidential and voluntary support services by phone or online chat (See Appendix A). The objectives of these services are to:

- Minimize the severity and duration of the trauma
- Normalize feelings and reactions
- Acknowledge each individual's personal experience
- Reassure that recovery is possible
- Provide support
- Provide information on crisis reactions and stress management
- Refer those needing individual counselling

7.4 Resumption of Services

The Site Manager (or Designate) will ensure site service power, communication, natural gas, and other essential services to the station are re-established to assist in the recovery from the emergency/disaster. Computer Support Services will ensure data protection and recovery procedures are in place.

7.5 Water Shortage

Not applicable as wind powered generators do not use water in the production of electricity.

7.6 Pandemic and Epidemic Response

Operations Staffing/Control Room Location Action Plan

Plant Name: US Renewables

Date of Revision: 16/Oct/2020

1. **Operation Staffing/Control Room Resources (including those with partial skillset)**

US Renewables essential workers are the:

- a. CP Facility Manager
- b. OEM Manager
- c. OEM Technicians
- d. Operating Control Center (OCC)

CP management and OEM Contractor management are separated at the facilities, with minimal to no contact with each other.

- All fence gates and building doors remain locked throughout the workday.
- Regular handwashing between each turbine visit, upon arrival and departure of the facility.
- All new individuals to complete "COVID-19 Fit-for-Duty Questionnaire"

Site Lead and technicians have been separated into designated teams. Teams are not to congregate and should be separated at all times, including at meals.

All work and eating surfaces are to be thoroughly wiped down. 30 minutes time between disinfecting and the next team using area, to allow for drytime.

Turbine operations can be controlled from OCC, the O&M building, and OEM ROC.

For BOP operations OCC and OEM buildings are the points of control.

2. **Normal Compliment**

In operations, there is one CP site manager on facility for 8hrs/day for five days a week. They are available on call as needed, depending on availability. OEM technicians are a one-shift operation during the same hours as the facility manager.

Total Operators

- 1 – CP Site manager
- 2-3 – OEM technicians

There are between 2-3 OEM technicians, per team performing wind turbine maintenance. There is 1 shift/ weekday. Shifts are typically 8hr/ day and occur on weekdays during normal business hours.

3. **Reduced Staffing Triggers**

Trigger point #1

If any of the CP Site Manager are unable to attend the facility.

- The CP Site Manager will stay home
- Designate CP Site Manager to be engaged and support as needed
- Designated CP Site Manager replacement is as outlined below:

Position & Department	Candidate 1	Candidate 2	Candidate 3
Site Manager – Bloom	Travis McDermott	Joseph Glaze	Derrick Perkins
Site Manager – New Frontier & Beaufort	William Phelan	Joseph Glaze	Derrick Perkins
Site Manager – Cardinal Pt	Travis McDermott	William Phelan	Derrick Perkins
Site Manager – Macho Springs	Aaron Loera	William Phelan	Travis McDermott
Site Manager – Buckthorn	Derrick Perkins	William Phelan	Travis McDermott

Trigger Point #2

If any of the OEM technician teams are unable to attend facility.

- The following shift set up for OEM technician team at New Frontier and Macho Springs:

Absent Crew	1st Ask	2nd Ask
Team 1	Team 2	Team 3
Team 2	Team 1	Team 3
Team 3	N/A – Emergency	N/A – Emergency
(off-site team)	Only Crew	Only Crew

- The following shift set up for OEM technician team at Bloom and Cardinal Point:

Absent Crew	1st Ask
Team 1	Team 2
Team 2	N/A – Emergency
(off-site team)	Only Crew

Appendix A—Emergency Phone #s and Resources

Emergency Phone #s

TABLE 1 - INCIDENT COMMAND POST		
Name/Title	Phone	Email
INCIDENT COMMANDERS		
Protected Information / Site Manager	Protected Information	Protected Information
FIELD TECHNICIANS		
Protected Information (Vestas Manager)	Protected Information	Protected Information
Protected Information (Tech 3)	Protected Information	Protected Information
Protected Information (Tech 3)	Protected Information	Protected Information
Protected Information (Tech 2)	Protected Information	Protected Information
Protected Information (Tech 2)	Protected Information	Protected Information

TABLE 2 - CP INTERNAL CONTACTS		
Name/Title	Phone	Email
ENERGY MANAGEMENT OPERATIONS CENTRE (EMOC)		
Protected Information	Direct: Protected Information	
CP SECURITY ADVISOR		
24 hours 1-780-292-5620		
SITE PERSONNEL		
Protected Information / Site Manager	Protected Information	Protected Information

TABLE 3		
Name/Title	Phone	Email
MANAGER OF SECURITY AND CONTINGENCY PLANNING		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
EMERGENCY MANAGEMENT COORDINATOR		
Protected Information	Office: Protected Information	Protected Information
SR. HEALTH & SAFETY ADVISOR		
Protected Information	Protected Information	Protected Information
SR. ENVIRONMENT ADVISOR		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
DIVISION VICE PRESIDENT		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
DIRECTOR RENEWABLES		
Protected Information (US)	Cell: Protected Information	Protected Information
Protected Information (Canada)	Office: Protected Information Cell: Protected Information	Protected Information
MEDIA RELATIONS & COMMUNICATIONS MANAGER		
Protected Information	Cell: Protected Information Office: Protected Information	Protected Information
EXTERNAL AFFAIRS		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
CP INSURANCE – RISK MANAGEMENT		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
VP, HEALTH, SAFETY, AND ENVIRONMENT		
Protected Information	Office: Protected Information Cell: Protected Information	Protected Information
VP, HUMAN RESOURCES		
Protected Information	Office: Protected Information	Protected Information
CP INTEGRATED HUMAN RESOURCES		
N/A	Protected Information (24 hrs)	Protected Information

TABLE 4 - CRISIS MANAGEMENT CENTRE

Name/Title	Contact	Comment
CP Security Advisor		
24 Hour Number	Cell: Protected Information	Primary contact to activate the Crisis Management Team (CMT)
CMC Facility Coordinator		
Prime – Protected Information <i>Senior Manager, Security and Contingency Planning</i>	Cell: Protected Information Office: Protected Information	Alternate contact for activating CMT when primary contact is unsuccessful
Alternate – Protected Information <i>Senior Advisor, Physical Security</i>	Cell: Protected Information Office: Protected Information	Alternate contact for activating CMT when primary contact is unsuccessful
Alternate – Protected Information Forensics and investigations specialist.	Cell: Protected Information Office: Protected Information	Second alternate contact for activating CMT when primary contact is unsuccessful
CMC Media Relations		
Protected Information <i>Media Relations Manager</i>	After Hours Contact: Protected Information Cell: Protected Information	Primary contact for incidents involving media relations
Employee and Family Assistance Program (EFAP)		
Shepell	Protected Information www.workhealthlife.com	Contact for confidential and immediate support resulting from an emergency or crisis.
Capital Power Integrity Hotline		
EthicsPoint	1-866-363-8028	Contact for confidential concerns involving personnel
CMC Conference Room Contacts		
EPCOR Tower	Protected Information	Primary CMC
Clover Bar Energy Centre	Protected Information	Alternate CMC

TABLE 5 - CONTRACTORS

Service Provider	Phone	Key Information
Vestas	Protected Information	Anything turbine related
Diamond M Land Management / Protected Information	Protected Information	Anything roads, land work, collection lines packing.
Shermco	Protected Information	Anything substation related, line locate, hv underground
Chemical Weed Control	Protected Information	Weed Control O&M, Substation, tower bases.

TABLE 6 - EMERGENCY SERVICES	
Name/Title	Phone
Ambulance	911 or (254) 965-6541
Fire Department	911 or (254) 965-3388
EMOC	Protected Information
Texas Game Warden – Michael Hummert	(254) 485-1520
Erath County Sheriff – Matt Coates	(254) 965-3338
Erath Department of Public Safety	(254) 965-7894
Dental ER (Dr. Robert Barberee DDS)	(254) 233-8142
Emergency Eye Surgery – Stephenville Medical and Surgical Clinic (Dr. Kevin Kerr)	(254) 965-2020
Fuel Supplier	Not applicable to Wind Assets

TABLE 7 - GOVERNMENT		
Office/Location	Phone	Key Information
National Weather Service / Erath County	(817) 429-2631	Weather Information
Texas Commission on Environmental Quality	(800) 832-8224	Reporting spills
Texas Parks and Wildlife	(800) 792-1112	Wildlife reporting
Public Utilities Commission of Texas	(512) 936-7000	Emergency plan activation, changes to existing plans, testing of the plan
Office of Public Utility Counsel	(877)839-0363	Emergency plan activation, changes to existing plans, testing of the plan

TABLE 8 - REGULATORY		
Office/Location	Phone	Key Information
EMOC	(780) 392-5350	Reporting operational concern
OSHA, Texas	(817) 428-2470	HSE & Accident Reporting
ERCOT	(512) 248-6800 shiftsupervisors@ercot.com	Grid Reliability Risk reporting
Brazos	(254) 750-6500	Grid Reliability Risk reporting
Texas RE	rapa@texasre.org	Physical or cybersecurity reporting

E-ISAC	(202) 790-6000 operations@eisac.com	Physical or cybersecurity reporting
NERC	(404) 446-9780 systemawareness@nerc.net	Physical or cybersecurity reporting

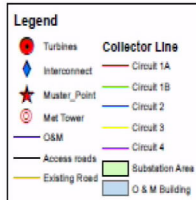
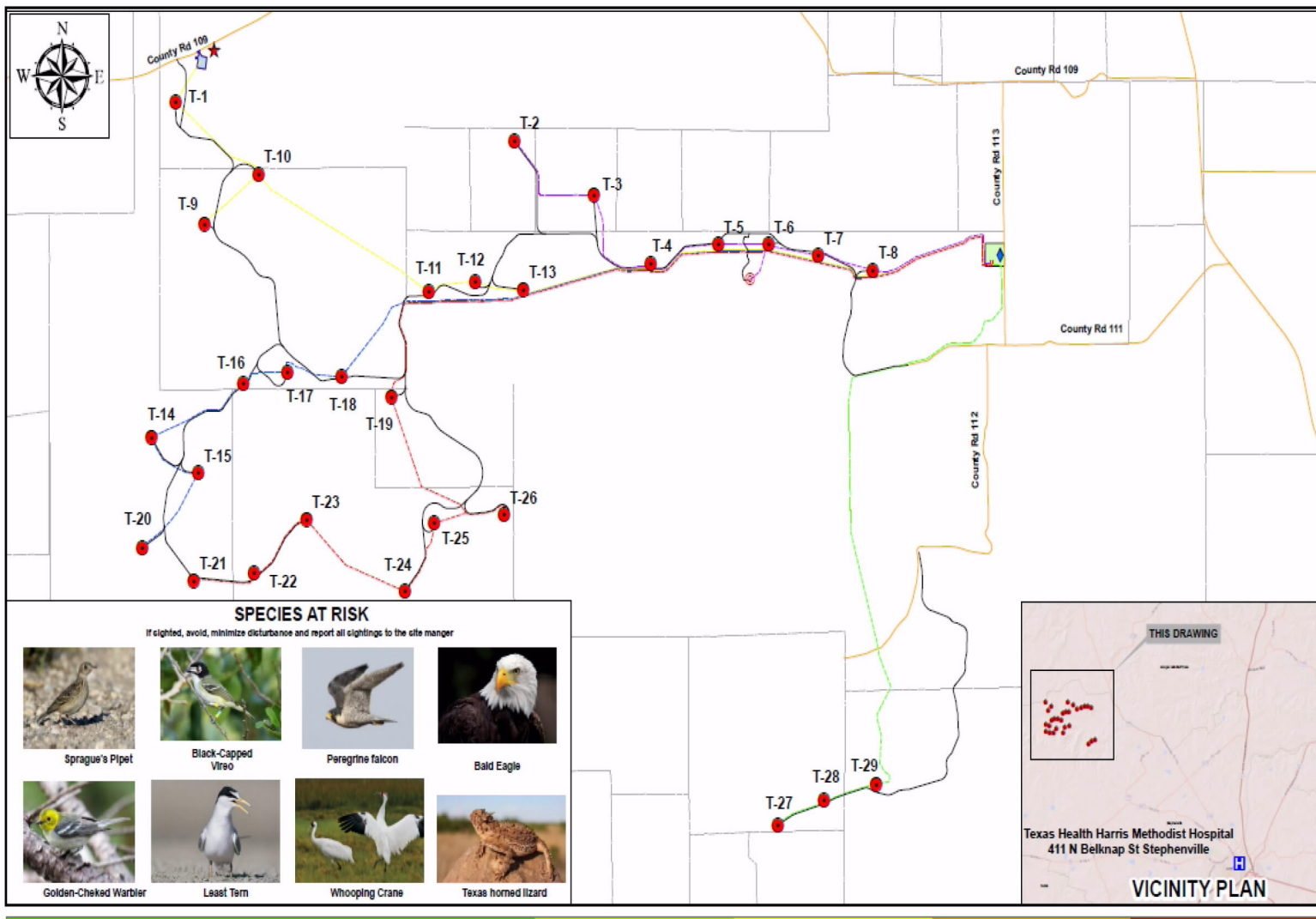
Site Emergency Equipment

The following inventories of on-site emergency equipment are based on an annual assessment of ESP requirements. Responsibilities for managing and evaluating usage, including accountability to ensure equipment return, assessment for required repair or replacement must be maintained by the accessing authorities.

Type	Description	Qty	Location	Access Authority
Fire extinguisher	Device to extinguish fire	4	Main Entry O&M / Shop door / Substation doors	All trained personnel
AED	Automated External Defibrillator	1	O&M building / Front Main Door Right Side	All AED trained personnel
C-pack	Neck and upper back support board for up-tower rescue	1	O&M building / Front Main Door Right Side	All ENSA trained personnel

Appendix B—Maps and Floor Plans

SITE MAP



T-04 Gate is Keyed (MUST REMAIN LOCKED)
T-08 Gate code is 3006 (MUST REMAIN LOCKED)
Gate to enter T27, T28, and T29 code is 19633

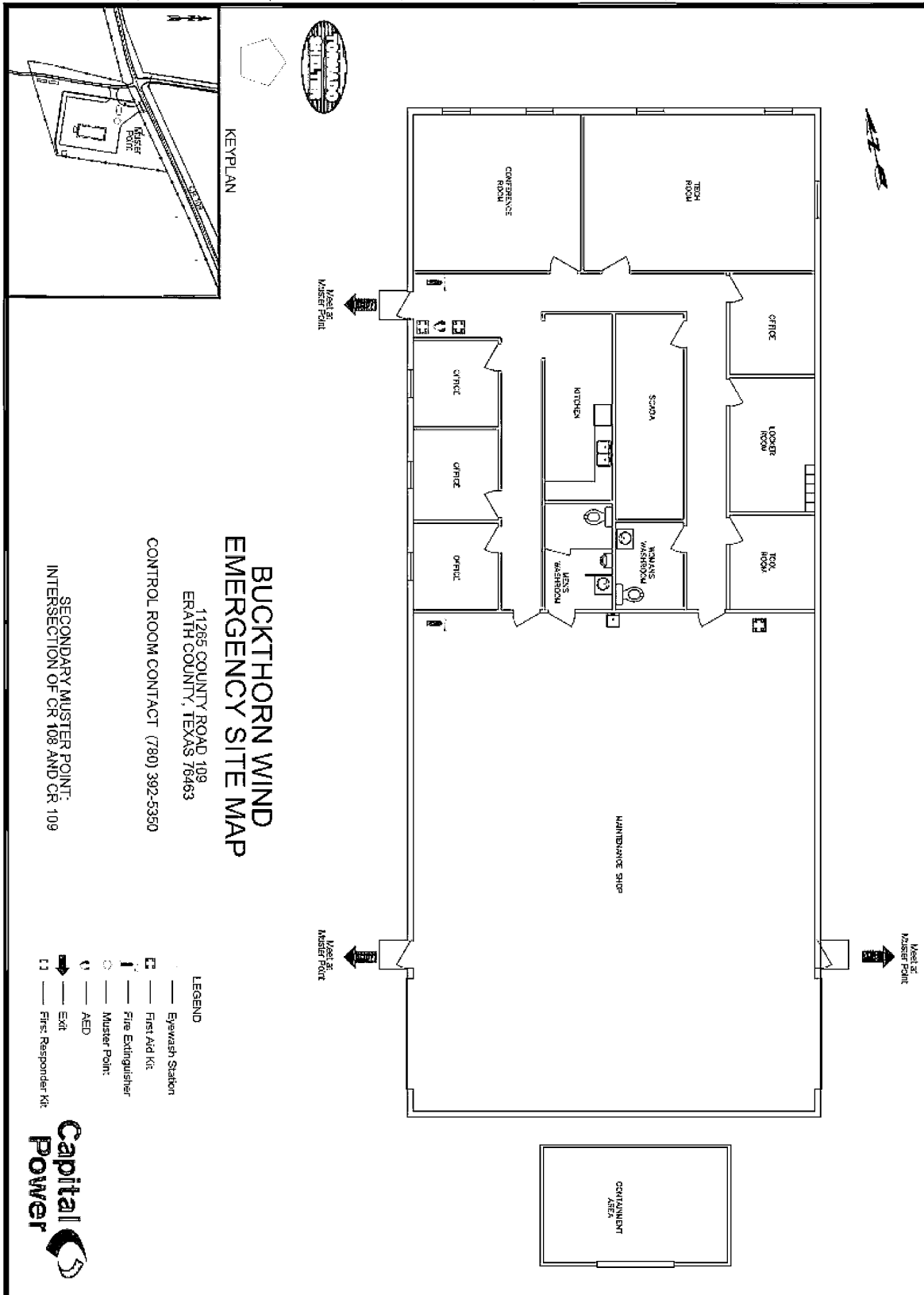
Buckthorn Wind Location Map

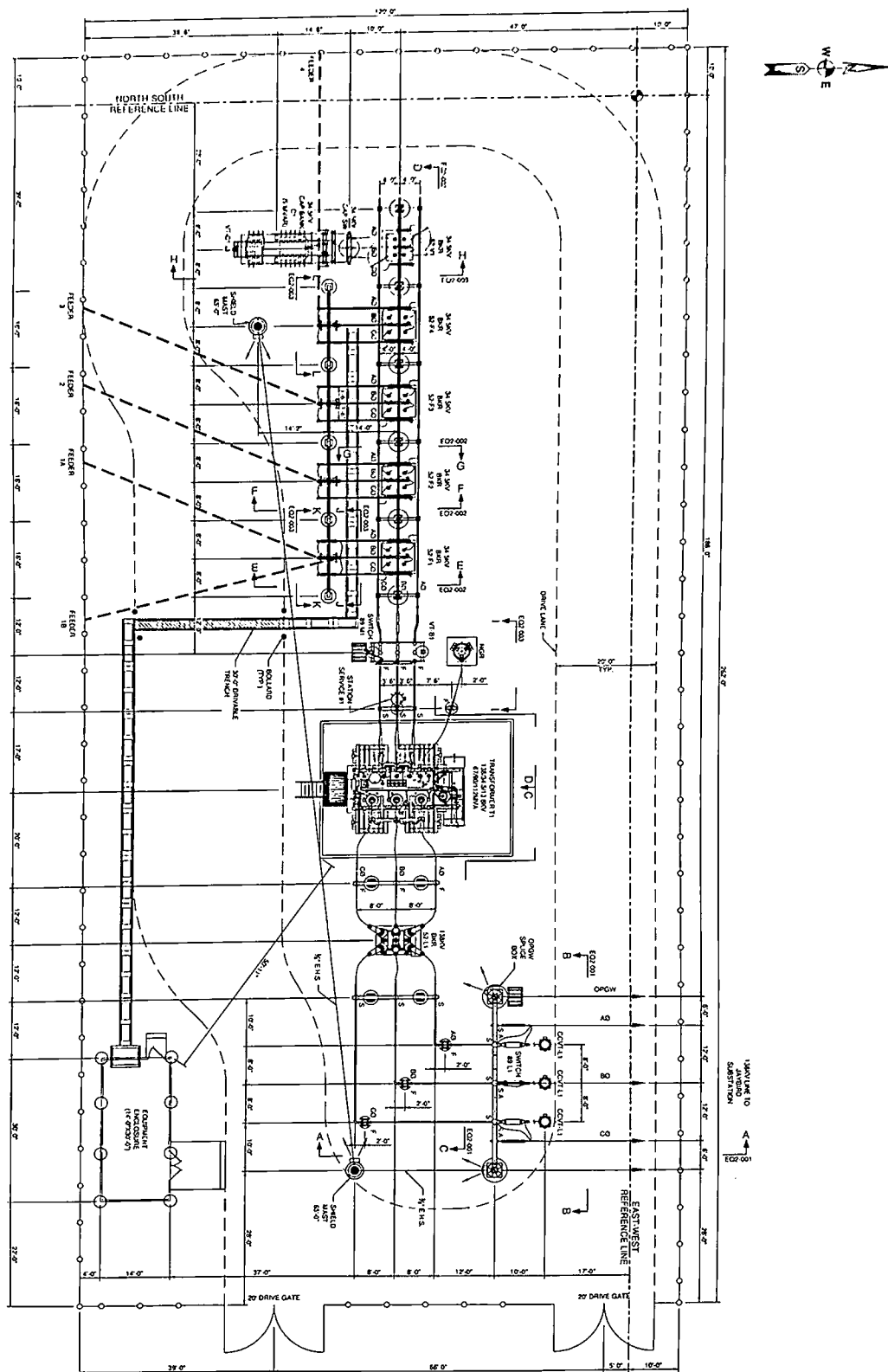
SITE ADDRESS

11265 County Road 109
Erath County, Texas
78463

Date: 11/20/2021

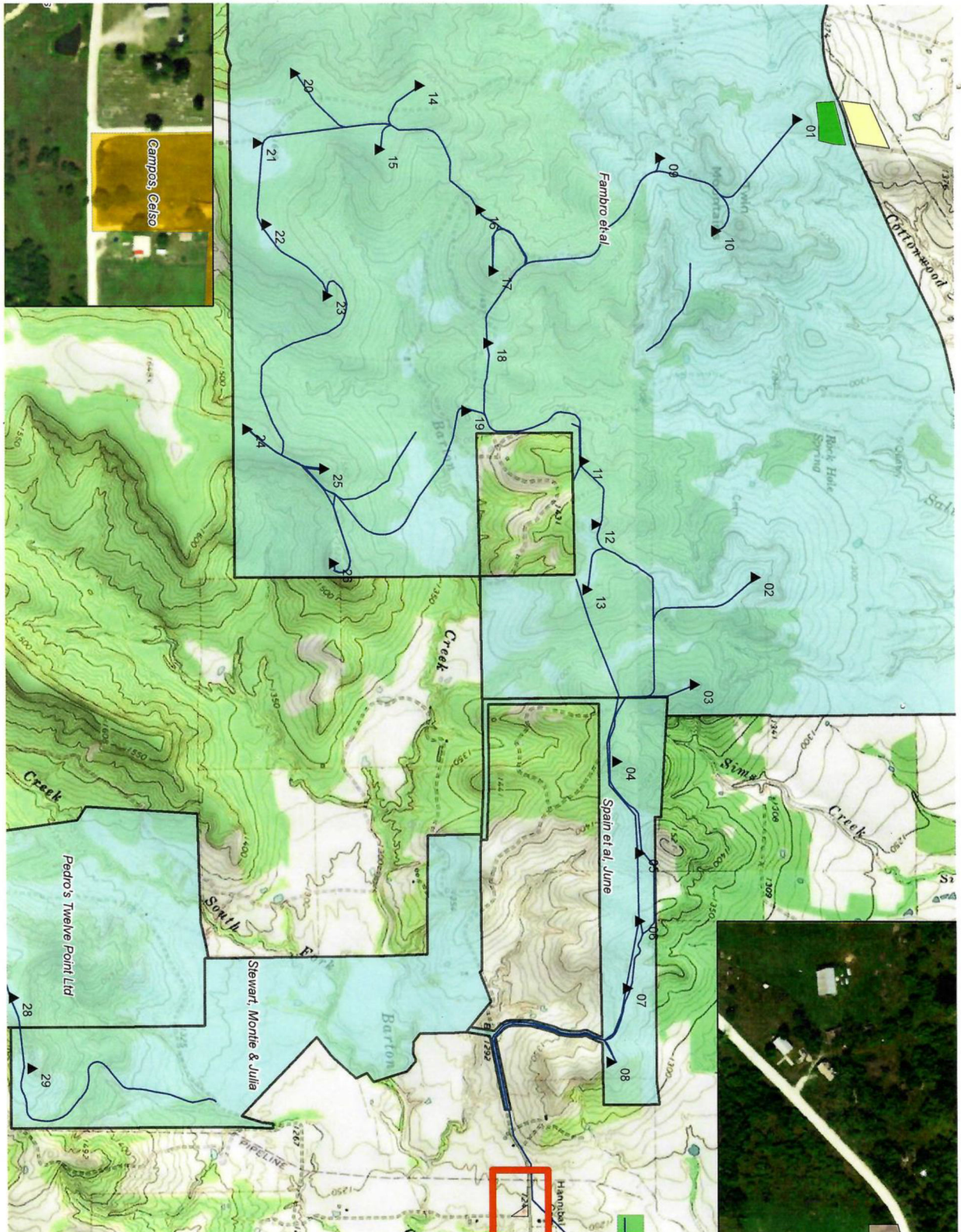
& Maintenance Building Floor Plan





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Buckthorn Stakeholders Map



Appendix C – INCIDENT ACTION PLAN DEVELOPMENT

Prepared By:	Position:	Date:	Time:
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Item #	Item																																																																																																									
1	Confirm this Operational Period: From (start time): _____ To (time): _____																																																																																																									
2	Confirm Goals and priorities: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr><td style="width: 5%; text-align: center;">1</td><td>To protect and minimize the impact to the health and safety of site personnel and the general public</td></tr> <tr><td style="text-align: center;">2</td><td>To protect and minimize the impact to the environment</td></tr> <tr><td style="text-align: center;">3</td><td>To protect equipment, infrastructure, and property</td></tr> <tr><td style="text-align: center;">4</td><td>To resume normal operations as soon as safely possible</td></tr> <tr><td style="text-align: center;">5</td><td> </td></tr> <tr><td style="text-align: center;">6</td><td> </td></tr> </table>	1	To protect and minimize the impact to the health and safety of site personnel and the general public	2	To protect and minimize the impact to the environment	3	To protect equipment, infrastructure, and property	4	To resume normal operations as soon as safely possible	5		6																																																																																														
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3	Key Objectives and Tasks for this Operational Period: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 10%;">Priority (Hi, Med, Low)</th> <th style="width: 45%;">Objectives / Associated Tasks</th> <th style="width: 15%;">Estimated time to complete by</th> <th style="width: 15%;">Assigned to (Lead)</th> <th style="width: 15%;">Completed (Time)</th> </tr> </thead> <tbody> <tr><td> </td><td><u>Objective 1:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td><u>Associated Tasks:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td><u>Objective 2:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td><u>Associated Tasks:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td><u>Objective 3:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td><u>Associated Tasks:</u></td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Priority (Hi, Med, Low)	Objectives / Associated Tasks	Estimated time to complete by	Assigned to (Lead)	Completed (Time)		<u>Objective 1:</u>					<u>Associated Tasks:</u>																														<u>Objective 2:</u>					<u>Associated Tasks:</u>																									<u>Objective 3:</u>					<u>Associated Tasks:</u>																												
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APPENDIX D – INITIAL INCIDENT INFORMATION FORM

INITIAL INCIDENT INFORMATION			
CALLER:		CALLER CONTACT:	
INCIDENT LOCATION: _____			
DATE / TIME OF EVENT: _____			
PERSONNEL INVOLVED: Yes _____ No _____ How Many? _____			
SEVERITY OF INJURY (IES) Minor _____ Significant _____ Serious _____ Significant _____			
INCIDENT DESCRIPTION (circle one): PRODUCT RELEASE / FIRE / EXPLOSION / ENVIRONMENTAL/SECURITY			
PRODUCT(S) INVOLVED: _____			
ESTIMATED QUANTITY: _____			
WIND SPEED: _____		WIND DIRECTION (FROM): _____	
LEVEL OF EMERGENCY: SIGNIFICANT MAJOR CRITICAL			
EMERGENCY NOTIFICATION			
TIME EMERGENCY SERVICES NOTIFIED			
FIRE: _____ POLICE: _____ AMBULANCE: _____ OTHER: _____			
ARRIVAL TIME ON-SITE:			
FIRE: _____ POLICE: _____ AMBULANCE: _____ OTHER: _____			
CALLER'S RECOMMENDED ACTIONS: _____			
ADDITIONAL COMMENTS			

Appendix E – POST INCIDENT/EXERCISE DEBRIEF FORM

Debrief Leader

- Construct incident timeline including significant events and decisions based on notes, time log and/or incident recordings
- Define meeting and structure

Process

- Introductions – Introductions of all individuals present
- Leader to review Post Incident / exercise guidelines and meeting schedule and structure with participants
- Leader to review incident timeline and significant events with participants
- Each participant has 3-5 minutes to voice their observations from the incident, negative AND positive, and raise any issues
- Summarization – Leader will summarize the comments and issues to the group and the floor opened for discussion
- Report – The leader will compile a brief report using that captures the salient issues and any recommendations documented in the Post Incident / Exercise Debrief Worksheet to capture (see Form 5). Report will be distributed to all participants

POST INCIDENT / EXERCISE DEBRIEF WORKSHEET
Date:
Site Name and Location:
☐

Emergency

☐

Exercise

List of Personnel Involved in Debrief and Organization (internal/external responders, controllers etc.)

NAME	ORGANIZATION

Discussion Points

Below is to track 'successes' AND 'areas for improvement' that have been identified by the participants of the debrief

What Worked / Went Well:
What Did Not Work Well:

Appendix F – HAZARD RISK VUNERABILITY ASSESSMENT

Date completed: _____

Reviewed By: (Site Managers, Emergency Site Plan Administrator)

Name _____ Date _____

Name _____ Date _____

This HRVA includes emergencies that take **Capital Power Renewable Operations** significantly out of normal operating functions – hazards that do not fit this definition are assessed and controlled within the CPC Health and Safety Management System

RISK CLASS is assessed after hazard controls implemented and are proven to be effective

Hazard Description	Actions & Controls	Likelihood	Consequence	Residual Risk Class	Action Assigned To	Action Due Date	Action Completion Date	Have all actions been taken to reduce risk to ALARA? (As Low As Reasonably Achievable)
	Prevention/Mitigation:							Yes
	Preparedness:							No
	Response:							Comments
	Recovery:							
	Prevention/Mitigation:							Yes
	Preparedness:							No
	Response:							Comments
	Recovery:							
	Prevention/Mitigation:							Yes
	Preparedness:							No
	Response:							Comments
	Recovery:							
	Prevention/Mitigation:							Yes
	Preparedness:							No
	Response:							Comments
	Recovery:							
	Prevention/Mitigation:							Yes
	Preparedness:							No
	Response:							Comments
	Recovery:							

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Appendix G – Site Status Report

1. Site:	
2. Hazard and Risk Vulnerability Assessment (To be completed annually)	Last Completion Date: (Attach latest HRVA to this report)
Comments:	
3. Plan Maintenance	<p>Have any changes in the HRVA been reflected in the Emergency Site Plan? (New tactical plans, deletion of unneeded tactical plans, etc.) Yes / No</p> <p>Have all phone numbers within the Emergency Site Plan been checked / updated in the last six months? Yes / No</p> <p>Have Mutual Aid or Memoranda of Understanding been review or updated in the past twelve months? Yes / No</p>
<p>Additional plan maintenance performed? ('Reviewed – no action needed' is acceptable)</p> <p>Comments:</p>	
4. Exercises	<p>Have the annual mandatory exercises been completed?</p> <ul style="list-style-type: none"> Two Orientation Exercises Yes / No One Tabletop Exercise Yes / No One Drill Yes / No <p>Have exercises been debriefed and recommendations submitted? Yes / No</p>
<p>Have any additional exercises been performed? (Include descriptions and dates.)</p> <p>Comments:</p>	
5. Actual Event Reporting	<p>Have emergency debriefings been completed? Yes / No</p>

		Has a plan been defined to implement recommendations? Yes / No
Please describe the event:		
6. Training (to be completed annually)		<p>Has the mandatory training been completed in accordance with Capital Power's Emergency Management Program?</p> <p>Yes / No</p> <p>Has Emergency Site Plan familiarization training been conducted?</p> <p>Yes / No</p> <p>Has site Emergency Coordination Centre (or Emergency Operations Centre) familiarization training been conducted?</p> <p>Yes / No</p>
Comments:		
7. ISAT Audit (to be conducted once every three years)		<p>Last completion date:</p> <p>Has a plan been identified to implement recommendations? Yes / No</p>
Additional Comments or Attachments:		
<p>8. Date:</p> <p>9. Signed:</p> <p>_____</p> <p>Emergency Site Plan Administrator Site Manager</p>		

Appendix H — BOMB THREAT INFORMATION FORM

Bomb Threat Information Form						
Date:		Time:		Call Received By:		
Exact words of caller (use back of page if needed):						
Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female						
Approx. Age: <input type="checkbox"/> Young <input type="checkbox"/> Middle-aged <input type="checkbox"/> Old						
Tone of Voice:	<input type="checkbox"/> Angry	<input type="checkbox"/> Serious	<input type="checkbox"/> Slurred	<input type="checkbox"/> Hesitating	<input type="checkbox"/> Excited	
	<input type="checkbox"/> Disgusted	<input type="checkbox"/> Nervous	<input type="checkbox"/> Crying	<input type="checkbox"/> Emotional	<input type="checkbox"/> Calm	
	<input type="checkbox"/> Loud	<input type="checkbox"/> Disguised	<input type="checkbox"/> Deep	<input type="checkbox"/> Rough	<input type="checkbox"/> Soft	
Language:	<input type="checkbox"/> Halting	<input type="checkbox"/> Slang	<input type="checkbox"/> Uneducated	<input type="checkbox"/> Fast	<input type="checkbox"/> Slow	<input type="checkbox"/> Normal
	<input type="checkbox"/> Lisp	<input type="checkbox"/> Stutter	<input type="checkbox"/> Impaired	<input type="checkbox"/> Nasal	<input type="checkbox"/> Vulgar	<input type="checkbox"/> Refined
Background Noise:	<input type="checkbox"/> Traffic		<input type="checkbox"/> Construction		<input type="checkbox"/> Airplanes	
	<input type="checkbox"/> Music		<input type="checkbox"/> Office Equip.		<input type="checkbox"/> Other:	
Questions to ask the caller:						
1. Who is this:						
2. When is the bomb set to go off?						
3. Where is the bomb located?						
4. What does the bomb look like?						
5. What kind of bomb is it? How is it constructed?						
6. Why are you doing this?						
7. Why are you warning us?						
8. Other comments:						

Bomb Threat Information Form

Appendix I – STATUS BOARD INCIDENT INFORMATION

STATUS BOARD INCIDENT INFORMATION

INCIDENT INFORMATION			RESOURCES ON SCENE			
DATE:	TIME:		TYPE:	# PEOPLE:	COMMENT:	
WIND SPEED:	FROM:	TEMP:	FIRE DEPARTMENT			
LEVEL OF EMERGENCY:			MEDICAL (EMS)			
INCIDENT COMMANDER:			HAZMAT			
INCIDENT LOCATION:			POLICE			
			SECURITY			
INCIDENT DETAILS: (Fire / Release / Explosion / Spill / Other)						
			ADDITIONAL RESOURCES			
			TYPE:	SOURCE:	EN ROUTE / ON SCENE	
PRODUCT(S) INVOLVED:						
			STAGING AREA LOCATION:			
			STAGING AREA OFFICER:			
EQUIPMENT IMPACTED:			INJURIES			
			Name:	Injury Type:	Employee / Contractor / Visitor	Transported to:
INFRASTRUCTURE IMPACTED:						
PLANT OPERATIONS IMPACTED:						
OTHER NOTES:						

Appendix J – STATUS BOARD INJURY DETAILS

Name	Injury	Family Contacted	Transported Location	Follow-up Contact

Appendix K – STATUS BOARD NOTIFICATIONS

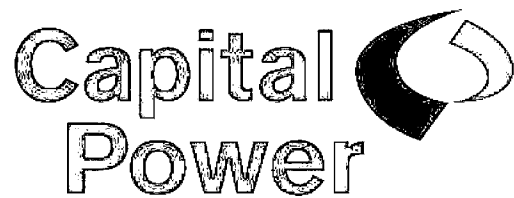
ORGANIZATION	REQ'D? (√)	PERSON RESPONSIBLE	INITIAL CALL - TIME	FOLLOW UP - TIME	COMMENTS

Appendix L – Status Board Staffing

TODAY'S DATE:			
POSITION	NAME	IN	OUT
CORE TEAM			
SUPPORT TEAM			
COMMENTS:			

INCIDENT NAME: _____ INCIDENT START DATE: _____			

[illegible]



INCIDENT RESPONSE PLAN

CAPITAL POWER

MARCH 22, 2021

PROPRIETARY AND CONFIDENTIAL

CONTENTS

REVISION TABLE	6
1 INTRODUCTION.....	7
1.1 BACKGROUND	7
1.2 SCOPE AND APPROACH OF DOCUMENT	7
2 GOVERNANCE.....	9
2.1 CIRT MISSION STATEMENT.....	9
2.2 CIRT CHARTER.....	9
2.3 INCIDENT RESPONSE PLAN TESTING	11
2.4 INCIDENT RESPONSE PLAN MAINTENANCE.....	11
2.5 SPONSORSHIP AND AUTHORIZATION.....	13
3 CIRT ORGANIZATION	14
3.1 BACKGROUND	14
3.2 ORGANIZATIONAL STRUCTURE	14
3.3 ROLES AND RESPONSIBILITIES	15
3.4 INCIDENT RESPONSE ROLES AND STAKEHOLDERS	16
3.4.1 Stakeholders	16
3.4.2 Incident Commander (CIRT-IC).....	17
3.4.3 Cyber Incident Response Team (CIRT)	18
3.4.3.1 Cyber Security Manager (CSM).....	18
3.4.3.2 Forensics & Investigations Specialist	18
3.4.3.3 General Managers of Technology	19
3.4.3.4 Protected Information Incident Response Retainer.....	19
3.4.4 Extended Roles.....	19
3.4.4.5 Crisis Management Team (CMT)	19
3.4.4.6 Senior Leadership Team (SLT)	19
3.4.4.7 Legal Counsel	19
3.4.4.8 Corporate Communications (Internal/External)	19
3.4.4.9 Service Desk	19
3.4.4.10 Human Resources.....	19
3.4.4.11 Corporate Compliance.....	20
3.4.4.12 Information System Owners, Support Personnel, and Users	20
4 OPERATIONS.....	21
4.1 THREAT LANDSCAPE.....	21
4.1.1 Insider Threats	21
4.1.1.13 Unintentional Insider Threats.....	21
4.1.1.14 Deliberate Insider Threats	21
4.1.2 Common Threats	21
4.1.2.15 Hactivist Threats.....	21
4.1.2.16 Cybercrime Threats.....	21
4.1.2.17 Advanced Persistent Threat Attackers	22
4.2 EVENTS & EVENTS OF INTEREST DEFINITIONS	22
4.3 INCIDENT DEFINITIONS	24
4.4 INCIDENT CATEGORIES AND TYPES - IS	25

4.5	INCIDENT CATEGORIES AND TYPES - OT	26
4.6	INCIDENT CRITICALITY LEVEL DEFINITIONS.....	27
5	INCIDENT RESPONSE PROCESS	31
5.1	INCIDENT RESPONSE WORKFLOW	32
5.2	PHASE: PREPARATION	33
5.2.1	Prevention	33
5.2.2	Identification	33
5.2.3	Establish Protocols for Secure Communication	33
5.2.4	Establish Mechanism to Track Time.....	34
5.2.5	Assemble Toolkits.....	34
5.2.6	Access Management	37
5.2.7	Ensure Time Synchronization.....	37
5.2.8	Identify Intelligence Feeds	37
5.2.9	Maintain Incident Knowledge Base.....	37
5.2.10	Maintain Network Documentation.....	38
5.2.11	Data Inventory.....	38
5.2.12	Training	38
5.3	PHASE: IDENTIFICATION	39
5.3.1	Process	39
5.3.2	Detecting Adverse Events.....	39
5.3.3	IT and OT Infrastructure.....	39
5.3.4	End Users	40
5.3.5	Escalation Process	40
5.4	PHASE: TRIAGE	40
5.4.1	Process	40
5.4.2	Collect Non-Technical & User Information (Interview).....	41
5.4.3	Collect Systems Information	41
5.4.4	Review Playbooks.....	42
5.4.5	Decision Points / Determine Next Steps.....	42
5.4.6	Legal Considerations	45
5.5	PHASE: INVESTIGATION.....	45
5.5.1	Process	45
5.6	PHASE: CONTAINMENT.....	46
5.6.1	Process	46
5.7	PHASE: REMEDIATION.....	47
5.7.1	Process	47
5.8	PHASE: POST-INCIDENT	48
5.8.1	Process	49
5.8.2	Conduct Monthly and Periodic Incident Reviews	49
5.8.3	Conduct Annual Program Review.....	50
6	REPORTING	51
6.1	INTERNAL REPORTING	51
6.2	EXTERNAL REPORTING	51
6.3	METRICS.....	52
7	APPENDIX A: GLOSSARY OF TERMS	53
8	APPENDIX B: CIRT ESCALATION MATRIX	55



9 APPENDIX C: INCIDENT CRITERIA MATRIX 58

10 APPENDIX D: FORENSIC EVIDENCE COLLECTION 59

11 APPENDIX E: CONTACT LIST 61

11.1 CIRT CONFERENCE DIAL-IN INFORMATION 61

11.2 CAPITAL POWER CIRT ROLES 61

11.3 CAPITAL POWER – OPERATIONAL TECHNOLOGY 61

11.4 CAPITAL POWER – VP AND SENIOR LEADERSHIP 62

11.5 CAPITAL POWER - EXTENDED ROLES 62

11.6 CAPITAL POWER – COMPLIANCE GROUP 62

11.7 EXTERNAL CONTACTS 63

12 APPENDIX F: LOG SHEET..... 65

13 APPENDIX G: Protected Information 66

14 APPENDIX H: ENGAGING Protected Information INCIDENT RESPONSE RETAINER 67

15 APPENDIX I: SHARING RANSOMWARE ACTIVITY WITH THE E-ISAC..... 69

16 APPENDIX J: CYBER SECURITY INCIDENT RESPONSE PLAN CHECKLIST 70



List of Tables

Table 1: Incident Response Capabilities 8

Table 2: Criteria for Determining an EOI 24

Table 3: Category Descriptions 25

Table 4: Category Reporting Timeframe 26

Table 5: Category Descriptions 27

Table 6: Category Reporting Timeframe 27

Table 7: Definition of Incident Criticality Levels 28

Table 8: Definition of Functional Impact Levels 29

Table 9: Definition of Information Impact Levels 29

Table 10: Definition of Recoverability Impact Levels 30

Table 11: Incident Remediation Considerations 44

Table 12: Criteria to guide the investigation and analysis activities 60

Table 13: Protected Information 66

List of Figures

Figure 1: Attacker Lifecycle 10

Figure 2: Capital Power Incident Response Structure Scope of Responsibilities 15

Figure 3: CIRT Working Level Organization 15

Figure 4: Incident Response Process 31

Figure 5: Incident Response Workflow 32

Revision Table

Document Revision	Date	Modified By	Comments	IS Approval	ICS Approval
1.7	2019-01-13	Protected Information	Final release from Protected Information		
1.8	2020-02-13	Protected Information	Revision based on CPC feedback		
1.85	2020-02-26	Protected Information	NERC CIP requirements validation		
1.90	2020-03-01	Protected Information	Accepted changes and included list of tables and figures		
1.95	2021-03-15	Protected Information	Added Incident Check List, minor revisions		

1 Introduction

1.1 Background

Capital Power faces a wide variety of cyber security threats that may adversely impact business operations and facility operations. **These values support Capital Power's vision for incident response:**

To prevent a serious loss of digital information assets, property, or ability to conduct business by providing a dedicated capability that quickly and effectively leads, coordinates, and advises on cyber security issues, activities, and threat intelligence, in order to proactively identify, investigate, and respond to cyber security threats faced by Capital Power.

Capital Power's Cyber Incident Response Team (CIRT) is designed to minimize business and facility impact, return computing services to normal operations, reduce risk of data loss, and enable compliance to applicable **regulations and standards. Incident response effectiveness is based on an organization's ability to develop and document operational processes and procedures to operationalize and consistently implement those procedures using skilled staff and technology and to measure the outcome or success of those procedures.**

Capital Power is implementing this revision of the *Incident Response Plan* to modernize the plan of action that is ready to execute when a cyber security breach occurs. The *Incident Response Plan* will enable Capital Power to effectively detect, respond to, and contain cyber security breaches.

1.2 Scope and Approach of Document

Cyber incident response is a critical element of Capital Power's **Cyber Security program and supports the concept of resiliency across the enterprise with a focus on containing the incident, performing technical remediation, and returning the business to normal operations as soon as possible.**

The *Incident Response Plan* is designed to focus on rapid incident response to cyber security incidents impacting Capital Power lines of business, locations, services, and regions. This is a corporate Cyber Security Incident response plan and **covers CP's response to threats on both the business network as well as the Industrial Control / Operational Technology network, including Bulk Electric System (BES) Cyber Assets and Systems.**

This *Incident Response Plan* **describes Capital Power's Cyber Security Incident Response program and includes the following phases of incident response:**

- Preparation
- Identification
- Triage
- Investigation
- Containment
- Remediation
- Post-Incident

Capital Power has aligned the *Incident Response Plan* with five capability areas important for an effective and sustainable incident response program. These capabilities are discussed in the table below and form the structure of this document. Section 5 provides more information on the incident response process.

Section	Capability	Description
2	Governance	<ul style="list-style-type: none"> • CIRT's mission statement and charter • Mechanisms and processes required for the effective maintenance of the <i>Capital Power Incident Response Plan</i> • <i>Capital Power Incident Response Plan</i> sponsorship and authorization
3	CIRT Organization	<ul style="list-style-type: none"> • Organization structure of the CIRT • Roles and responsibilities • Stakeholders and key participants in the Incident Response program • Organization of personnel for incident response activities
4	Operations	<ul style="list-style-type: none"> • Capital Power threat landscape • Terminology and concepts, including events and incidents • Incident categories and severity levels utilized to prioritize and route incidents • Incident response process flow and narratives • Typical operational activities necessary to sustain an Incident Response program
5	Incident Response Process	<ul style="list-style-type: none"> • Incident response workflow
6	Reporting	<ul style="list-style-type: none"> • Post-incident reporting requirements • Lessons Learned debriefing • Metrics

Table 1: Incident Response Capabilities

NOTE TO PUCT: Capital Power has submitted the full IRP to ERCOT, with only sensitive information related to specific systems, 3rd party partners or individual names redacted. Separately, via appropriate forms Capital Power has provided key EOP and Cyber Security contact information to ERCOT.