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Received - 2022-04-14 11:43:49 AM
Control Number - 53385
ItemNumber - 56

	PUCT-0001	Rev. 0	Page 1 of 46
Electric Service Emergency Operations Plan			

Electric Service Emergency Operations Plan

Revision 0

Effective Date: 4/15/2022

Prepared by: Hector Leon

Date: April 12, 2022

Approved by: Michael Schaefer

Date: April 12, 2022

	PUCT-0001	Rev. 0	Page 2 of 46
Electric Service Emergency Operations Plan			

Table of Contents

	<u>Page</u>
1.0 Executive Summary.....	3
2.0 Purpose and Scope.....	5
3.0 Definitions	5
4.0 Plan Development, Maintenance and Distribution.....	5
5.0 Access/Training and Drills	6
6.0 Staffing	7
7.0 Communications	7
8.0 Concept of Operations	7
9.0 Business Continuity	8
10.0 ESEOP Filing Requirements	9
11.0 Annexes	10
Annex 1 - Weather Emergency (Hot and Cold) - 16 TAC §25.53 (e)(2)(A).....	12
Annex 2 - Water Shortage - 16 TAC §25.53 (e)(2)(B).....	14
Annex 3 - Restoration of Service - 16 TAC §25.53 (e)(2)(C).....	16
Annex 4 - Pandemic/Epidemic - 16 TAC §25.53 (e)(2)(D).....	18
Annex 5 - Hurricane - 16 TAC §25.53 (e)(2)(E).....	20
Annex 6 - Cyber Security - 16 TAC §25.53 (e)(2)(F).....	22
Annex 7 - Physical Security Incident - 16 TAC §25.53 (e)(2)(G).....	24
Annex 8 - Additional Annex (Radiological) - 16 TAC §25.53 (e)(2)(H).....	26
Table 1 - Electric Service Emergency Operations Plan Distribution Listing.....	28
Table 2 - Approval and Summary of Changes.....	29
Table 3 - Emergency Operation Plan Contact Listing.....	30
Enclosure 1 - Affidavit Example.....	31
Enclosure 2 - Attestation Example.....	33
Enclosure 3 - Description of Content.....	34
Enclosure 4 - PUCT Requirements to STPNOC Procedures Matrix.....	35

	PUCT-0001	Rev. 0	Page 3 of 46
Electric Service Emergency Operations Plan			

1.0 Executive Summary

1.1 General

- 1.1.1 South Texas Project Electric Generating Station (STPEGS) is operated and managed by the STP Nuclear Operating Company (STPNOC), acting as project manager on behalf of NRG South Texas LP, the City Public Service Board of San Antonio (CPS) as CPS Energy, and the City of Austin (COA) doing business as (dba) Austin Energy under the South Texas Project Operations Agreement. STPEGS is located entirely in south-central Matagorda County, west of the Colorado River, approximately 89 air miles southwest of Houston, Texas, 12 air miles north-northeast of Palacios, and approximately 14 air miles north of the Gulf of Mexico.
- 1.1.2 The STPNOC Electric Service Emergency Operations Plan (ESEOP) outlines how STPNOC complies with and implements the requirements of the Public Utilities Commission of Texas (PUCT) 16 TAC §25.53. The STPNOC ESEOP is a descriptive document that outlines STPNOC's many emergency and incident response policies and procedures.
- 1.1.3 This STPNOC ESEOP prescribes emergency response procedures for STPNOC, while it reflects the structure of emergency operating plans detailed in the PUCT's 16 TAC §25.53.
- 1.1.4 The plan serves as an emergency management link between STPNOC, local municipalities and state government while incorporating the PUCT, Office of Public Utility Counsel (OPUC), TDEM (Texas Division of Emergency Management) and federal (Federal Emergency Management Agency (FEMA), etc.) organizational concepts of electric service emergency operations planning.
- 1.1.5 STPNOC's ESEOP employs a functional, all-hazards approach that manages STPNOC's needs by incorporating eight Annexes. This functional approach is basically the same at the local, state and federal levels. STPNOC implements the plan by providing specific instruction to key personnel and by providing access to supportive personnel. This process is documented using STPNOC site processes for distributing information and training to its staff. A typical form documenting distribution of the ESEOP is included as Table 1 to this document.
- 1.1.6 STPNOC maintains a Business Continuity Plan (BCP) that provides guidance for addressing disruptions to normal business functions (e.g. information technology, payroll, accounts payable, access, purchasing/contracts, etc.) due to incidents or emergencies. This plan is initiated by the STPNOC Chief Nuclear Officer or designee. The BCP does not supersede the Emergency Plan or Electric Service Emergency Operations Plan requirements.

	PUCT-0001	Rev. 0	Page 4 of 46
Electric Service Emergency Operations Plan			

1.1.7 For reference to applicable STPNOC procedure/document page numbers and sections, see Annexes 1 through 8.

1.1.8 For a description of content on various STPNOC procedures/plans that are referenced in this ESEOP, see Enclosure 3.

1.2 Organization

1.2.1 The plan (ESEOP) is divided into supporting Annexes, each of which are developed, approved, and maintained separately. Each Annex refers to other implementing procedures/processes. This allows the specific Annexes to contain the appropriate level of detail, organizational review, and implementation guidance needed to ensure a more effective response. Annexes provide a listing of supporting plans that:

1.2.1.1 Support the ESEOP for assignment of responsibilities and operational principles that implement this plan during specific emergencies;

1.2.1.2 Stand alone because of regulatory requirements or the specific nature of the hazards they address;

1.2.1.3 Are published separately and incorporated into the ESEOP by reference; and

1.2.1.4 Provide helpful additional information (e.g., definitions, explanation of terms, maps) used during emergency response.

1.3 Requirements Matrix

1.3.1 Enclosure 4 of this document provides a cross-reference of 16 TAC §25.53 requirements to ESEOP Annexes and STPNOC process and procedures (including sections and/or page numbers, where appropriate).

	PUCT-0001	Rev. 0	Page 5 of 46
Electric Service Emergency Operations Plan			

2.0 Purpose and Scope

- 2.1 Purpose: This plan outlines activities to be taken by STPNOC to manage and coordinate emergency response activities and to provide support and interface with the private sector, State of Texas Division of Emergency Management (TDEM), PUCT, Electric Reliability Council of Texas (ERCOT), and Federal government agencies (e.g., FEMA, Nuclear Regulatory Commission (NRC)) in the event of a natural or human-caused event or disaster. This plan satisfies the requirements of PUCT 16 TAC §25.53 and is designed as an "All-Hazards" plan. It is organized into Annexes to allow it to be used in response to various disasters and emergencies.
- 2.2 Scope: The plan will apply to all emergencies that require STPNOC response in accordance with PUCT 16 TAC §25.53.

3.0 Definitions

- 3.1 Annex – a section of an electric service emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.
- 3.2 Drill – An operations-based exercise that is a coordinated, supervised activity employed to test an entity's ESEOP or a portion of an entity's ESEOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
- 3.3 Emergency – A situation in which the known, potential consequences of a hazard or threat are sufficiently imminent and severe that an entity should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. The term includes an emergency declared by local, state, or federal government, or the ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.
- 3.4 ESEOP – Electric Service Emergency Operations Plan (PUCT required emergency operations plan per 16 TAC §25.53)
- 3.5 Hazard – A natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.
- 3.6 TDEM – Texas Division of Emergency Management
- 3.7 Threat – the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.

4.0 Plan Development, Maintenance and Distribution

- 4.1 The ESEOP is developed and maintained consistent with the STPNOC plan development processes. All revisions to the ESEOP will be maintained within the STPNOC document control process.
- 4.2 The ESEOP is reviewed and approved by the appropriate STPNOC Executive.

	PUCT-0001	Rev. 0	Page 6 of 46
Electric Service Emergency Operations Plan			

- 4.3 Revisions to the ESEOP are to be approved by the appropriate STPNOC Executive.
- 4.4 The ESEOP contains an “Approval and Summary of Changes” that will list revisions to the ESEOP and will clearly indicate that the most recent version supersedes all others.
- 4.5 A typical ESEOP Approval and Summary of Changes page is included as Table 2.
- 4.6 The ESEOP is distributed via familiarization training and access provision as detailed in Section 5.0 of this ESEOP.
- 5.0 Access/Training and Drills
 - 5.1 STPNOC emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
 - 5.2 STPNOC provides key operating personnel with familiarization training on this ESEOP and access to the ESEOP. Key operating personnel are instructed to follow the applicable portions of the ESEOP except to the extent deviations are appropriate because of specific circumstances during an emergency.
 - 5.3 Training activities are documented within STPNOC’s training records program. An example of the information captured is provided as Table 1, “Emergency Operation Plan Distribution Listing” contained within this ESEOP.
 - 5.4 STPNOC may conduct multiple tabletops and drills in any given year. STPNOC will ensure that it conducts at least one drill each calendar year to test portions of the ESEOP.
 - 5.5 At least 30 days prior to conducting an annual ESEOP drill, STPNOC will, notify PUCT Commission staff through the Owners¹ of the date, time, and location of the drill by using the method and form prescribed by Commission staff on the Commission website; the appropriate TDEM District Coordinators will be notified by email or other written form.
 - 5.6 STPNOC conducts periodic hurricane drills/table-tops; at least one of these will be documented to meet the annual drill requirement for STPNOC. Actual hurricane response may be used to meet this requirement.
 - 5.7 Following any ESEOP drill, STPNOC will capture lessons learned to assess the effectiveness of its emergency response and will revise its ESEOP and supporting processes accordingly.

¹ Refers to NRG South Texas LP as a power generation company (PGC) and the City Public Service Board of San Antonio (CPS) - CPS Energy and the City of Austin - Austin Energy as municipally owned utilities.

	PUCT-0001	Rev. 0	Page 7 of 46
Electric Service Emergency Operations Plan			

6.0 Staffing

- 6.1 STPNOC can provide continuous (24 hour/day) operation for an extended period. Key functions will be maintained throughout an emergency by providing relief of the on-shift and augmenting positions by qualified individuals. The shift rotations for protracted periods will be designated (e.g., 8- or 12-hour shifts) during the emergency.
- 6.2 STPNOC on-shift staffing meets applicable regulatory requirements for the NRC-issued Renewed Facility Operating License.
- 6.3 In weather-related events such as a hurricane, storm crew personnel are activated when required.

7.0 Communications

- 7.1 Communications and Public Affairs Personnel from both STPNOC and its Co-Owners maintain plans and processes regarding the coordination of information with outside organizations. The methods and means used to communicate to the media and the public use joint information system (JIS) concepts, which integrate emergency information and public affairs. The mission of the JIS is to provide a structure and system for developing and delivering coordinated interagency messages and to develop, recommend, and execute public information plans and strategies.
- 7.2 STPNOC has identified specific personnel to immediately address urgent requests and questions from the PUCT as needed. Their contact information is provided as Table 3 to this ESEOP.
- 7.3 STPNOC Control Room Shift Managers, the designated QSE, the transmission system operator, and ERCOT communicate periodically during normal operations. STPNOC communication with ERCOT is made via the designated QSE. These communications are essential to continued operation and will continue during an emergency, as needed.

8.0 Concept of Operations

- 8.1 The concept of operations for event response address both common operational functions that are relevant across emergency types and Annexes that outline the response to specific types of emergencies. It is expected that the appropriate portions of this ESEOP be implemented when a situation or condition is recognized. Additionally, the STPNOC Business Continuity Plan is used to supplement this ESEOP.
- 8.2 The STPNOC concept of operations and overall expectations for event response are as follows:
 - 8.2.1 Recognize and classify the event or emergency.
 - 8.2.2 Review the ESEOP Annexes to augment or direct actions as appropriate.

	PUCT-0001	Rev. 0	Page 8 of 46
Electric Service Emergency Operations Plan			

- 8.2.2.1 For weather-related hazards, STPNOC will invoke Annex 1, “Weather Emergency (Hot and Cold),” Annex 2, “Water Shortage,” or Annex 5, “Hurricane” to this ESEOP (as applicable).
- 8.2.3 Notify STPNOC Co-owners, appropriate STPNOC personnel, and offsite authorities.
- 8.2.4 Request additional support from County, State, Federal and private organizations (as needed).
- 8.2.5 Establish and maintain effective communications with onsite and offsite (local, state, TDEM, PUCT, ERCOT, QSE, FEMA, NRC, etc.) entities.
- 8.2.6 Continuously assess the consequences of the event or emergency, and periodically communicate response status and assessment information to the appropriate groups and authorities.
- 8.2.7 Take actions onsite and recommend protective or mitigative actions to offsite authorities.
- 8.2.8 In conjunction with State and County officials, provide information to the public.
- 8.2.9 Respond to requests from TDEM, PUCT, OPUC, ERCOT, and so on.
- 8.2.10 Upon request of PUCT Staff during an activation of the State Operations Center by TDEM, provide updates on status of operations, outages, and restoration efforts as applicable.
 - 8.2.10.1 These updates may continue until all incident related outages of customers able to take service are restored or unless notified by PUCT Staff.
 - 8.2.10.2 PUCT Staff may require follow-up actions or lessons learned reporting by a date specified by the Commission.
- 8.3 Depending on the situation, STPNOC will invoke the appropriate Annex/es to the ESEOP to govern response activities specific to the event at hand.
- 8.4 STPNOC has made provisions for necessary emergency response supplies and conducts appropriate inventories and functional checks. Only key supplies are maintained as pre-identified and thereby inventoried and controlled. Hurricanes and declared emergencies are the drivers of these equipment and supply listing (specifics included in appropriate Annex).

9.0 Business Continuity

- 9.1 STPNOC has a Business Continuity Plan.

	PUCT-0001	Rev. 0	Page 9 of 46
Electric Service Emergency Operations Plan			

- 9.1.1 The purpose of the BCP is to provide guidance to STPNOC organizations in the event of natural disasters (e.g., hurricane, flood, and tornado), man-made disasters (e.g., terrorist attack, biological attack, and cyber-attack), or epidemic/pandemic health crises.
- 9.1.2 The Chief Nuclear Officer (CNO) or designee is made aware of a condition that could warrant implementation of the BCP by the STPNOC Emergency Response Organization or the Severe Weather coordinator.
- 9.1.3 Implementation of the BCP is declared by CNO or designee.
- 9.1.4 The BCP is used to supplement the STPEGS Emergency Plan and the ESEOP.

10.0 ESEOP Filing Requirements

- 10.1 STPNOC must file an executive summary through its Owners that:
 - 10.1.1 Describes the contents and policies contained in the ESEOP;
 - 10.1.2 Includes a reference to specific sections and page numbers of the entity's ESEOP that correspond with the requirements of 16 TAC §25.53;
 - 10.1.3 Includes the record of distribution; and is
 - 10.1.4 Submitted by affidavit².
- 10.2 STPNOC must file through its master or designated Qualified Scheduling Entity (QSE) a complete copy³ to ERCOT⁴ and a redacted copy through its Owners to the PUCT⁵.
 - 10.2.1 The initial PGC filing must be completed no later than April 18, 2022.
 - 10.2.2 The initial municipally owned utility filing must be completed no later than June 1, 2022.
- 10.3 Beginning in 2023, STPNOC must annually update information included in ESEOP no later than March 15.⁶

² Contents of the affidavit is detailed in PUCT 16 TAC §25.53 (c)(4)(C).

³ Contents of the ESEOP is detailed in PUCT 16 TAC §25.53 (c).

⁴ ERCOT will protect the unredacted filing as Protected Information per ERCOT Protocols. PUCT 16 TAC §25.53 (c)(1)(B) and (c)(1)(C).

⁵ PUCT must be provided with an unredacted copy of the ESEOP upon request. PUCT 16 TAC §25.53 (c)(3)(E).

⁶ Annual updates of ESEOP information is detailed in PUCT 16 TAC §25.53 (c)(3)(A).

	PUCT-0001	Rev. 0	Page 10 of 46
Electric Service Emergency Operations Plan			

10.3.1 For a change that materially effects how STPNOC would respond to an emergency, STPNOC must:

10.3.1.1 File an executive summary through its Owners that:

- a. Describes the changes to the contents or policies contained in the ESEOP;
- b. Includes an updated reference to specific sections and page numbers of the entity's ESEOP that correspond with the requirements of 16 TAC §25.53;
- c. Includes the record of distribution; and
- d. Is submitted under affidavit.

10.3.1.2 File with the Commission through its Owners a complete, revised copy of the ESEOP with all confidential portions removed; and

10.3.1.3 Submit to ERCOT through its master or designated QSE its revised unredacted ESEOP in its entirety.

10.3.2 If no changes were made to the ESEOP that materially affects STPNOC emergency response, STPNOC must:

10.3.2.1 Document any changes made to the list of emergency contacts;

10.3.2.2 Provide an attestation from an STPNOC Executive stating that no change to the ESEOP that materially affects STPNOC's emergency response had been made; and

10.3.2.3 Submit through its Owners an affidavit documenting the submittal.

10.3.3 STPNOC will update the ESEOP as requested by the PUCT.

11.0 Annexes

11.1 STPNOC has included eight Annexes within this ESEOP. The Annexes would be used to address each specific event or emergency type or classification. The Annexes are made up of numerous procedures each with specific implementation requirements, responsibilities and review and approvals. Additionally, the ESEOP includes a STPNOC PUCT Requirements Matrix that can be used to link procedures to specific PUCT requirements. The eight Annexes are:

11.1.1 Weather Emergency (Hot and Cold) – 16 TAC §25.53(e)(2)(A)

	PUCT-0001	Rev. 0	Page 11 of 46
Electric Service Emergency Operations Plan			

- 11.1.2 Water Shortage – 16 TAC §25.53(e)(2)(B)
- 11.1.3 Restoration of Service – 16 TAC §25.53(e)(2)(C)
- 11.1.4 Pandemic/Epidemic – 16 TAC §25.53(e)(2)(D)
- 11.1.5 Hurricane – 16 TAC §25.53(e)(2)(E)
- 11.1.6 Cyber Security – 16 TAC §25.53(e)(2)(F)
- 11.1.7 Physical Security Incident – 16 TAC §25.53(e)(2)(G)
- 11.1.8 Additional Annex (Radiological) – 16 TAC §25.53(e)(2)(G)

	PUCT-0001	Rev. 0	Page 12 of 46
Electric Service Emergency Operations Plan			

ANNEX 1

WEATHER EMERGENCY (HOT AND COLD) – 16 TAC §25.53(e)(2)(A)

	PUCT-0001	Rev. 0	Page 13 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	<p>A weather emergency annex that includes:</p> <ul style="list-style-type: none"> (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency. 	<p>WCG-0002 – Work Management Scheduling, Pages: Whole Document</p> <p>WCG-0011 – Summer Peak Period Readiness, Pages: Whole Document</p> <p>OPGP03-ZV-0004 – Winter Readiness Program, Pages Whole Document</p> <p>OPOP01-ZO-0004 – Extreme Cold Weather Guidelines, Pages: Whole Document, including checklist pages 46-49.</p> <p>OPOP02-CW-0001 – Circulating Water System Pump Operations, Page: 7.</p> <p>1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole Document.</p>	Weather Emergency annex

	PUCT-0001	Rev. 0	Page 14 of 46
Electric Service Emergency Operations Plan			

ANNEX 2

WATER SHORTAGE – 16 TAC §25.53(e)(2)(B)

	PUCT-0001	Rev. 0	Page 15 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	<p>OPOP02-EW-0001 – Essential Cooling Water Operations, Pages: Whole Document</p> <p>OPOP02-WW-0001 – Well Water System Operation, Pages: Whole Document</p> <p>OPOP04-ZO-0002 – Natural or Destructive Phenomena Guidelines, Pages: Whole Document</p> <p>OPOP02-CW-0001 – Circulating Water System Pump Operations, Pages: Whole Document</p> <p>OPOP02-LM-0001 – Reservoir Makeup Pumping Facility, Page: 60 - Addendum 3 – Main Cooling Reservoir Water Delivery Plan during Drought Conditions</p>	Water shortage annex

	PUCT-0001	Rev. 0	Page 16 of 46
Electric Service Emergency Operations Plan			

ANNEX 3

RESTORATION OF SERVICE – 16 TAC §25.53(e)(2)(C)

	PUCT-0001	Rev. 0	Page 17 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	<p>WCG-0001 - Work Screening and Processing, Pages: Whole Document</p> <p>WCG-0007 – Forced Outage Guideline Organization and Responsibilities, Pages: Whole Document</p> <p>OPOP03-ZG-0008 – Power Operations, Pages: Whole Document</p> <p>OPGP03-ZO-0022 – Post-Trip Review, Pages: Whole Document</p> <p>OPOP03-ZG-0003 – Secondary Plant Startup, Pages: Whole Document</p> <p>OPOP03-ZG-0005 – Plant Startup to 100%, Pages: Whole Document</p>	A restoration of service annex

	PUCT-0001	Rev. 0	Page 18 of 46
Electric Service Emergency Operations Plan			

ANNEX 4

PANDEMIC/EPIDEMIC – 16 TAC §25.53(e)(2)(D)

	PUCT-0001	Rev. 0	Page 19 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	1 STPNOC PANDEMIC-0001 – STPNOC Pandemic Response Guideline, Pages: Whole Document 1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole Document	Pandemic and epidemic annex

In response to an epidemic, STPNOC would utilize this pandemic response guideline (1 STPNOC PANDEMIC-0001 – STPNOC Pandemic Response Guideline), as needed.

	PUCT-0001	Rev. 0	Page 20 of 46
Electric Service Emergency Operations Plan			

ANNEX 5

HURRICANE – 16 TAC §25.53(e)(2)(E)

	PUCT-0001	Rev. 0	Page 21 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	<p>0POP04-ZO-0002 – Natural or Destructive Phenomena Guidelines, Pages: Whole Document</p> <p>0PGP03-ZA-0519 – Project Department Severe Weather Program, Pages: Whole Document</p> <p>ZV-0029 – Site Preparation for Tropical Storm or Hurricane, Pages: Whole Document</p> <p>1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole Document</p> <p>0PGP03-ZV-0003 – Hurricane Recovery Plan, Pages: Whole Document</p> <p>0PGP03-ZV-0002 – Hurricane Plan, Pages: Whole Document</p>	Hurricane annex

	PUCT-0001	Rev. 0	Page 22 of 46
Electric Service Emergency Operations Plan			

ANNEX 6

CYBER SECURITY– 16 TAC §25.53(e)(2)(F)

	PUCT-0001	Rev. 0	Page 23 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	OPGP03-ZS-0014 - Cyber Security Incident Response, Pages: Whole Document	Cyber security annex

	PUCT-0001	Rev. 0	Page 24 of 46
Electric Service Emergency Operations Plan			

ANNEX 7

PHYSICAL SECURITY INCIDENT – 16 TAC §25.53(e)(2)(G)

	PUCT-0001	Rev. 0	Page 25 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	OPGP03-ZA-0107 – Security of the South Texas Project Electric Generating Station, Pages: Whole Document	Physical security incident annex

	PUCT-0001	Rev. 0	Page 26 of 46
Electric Service Emergency Operations Plan			

ANNEX 8

ADDITIONAL ANNEX (RADIOLOGICAL) – 16 TAC §25.53(e)(2)(H)

	PUCT-0001	Rev. 0	Page 27 of 46
Electric Service Emergency Operations Plan			

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(H)	Any additional annexes as needed or appropriate to the entity's particular circumstances.	EP-0001.000, South Texas Project Electric Generating Station (STPEGS) Emergency Plan, Pages: Whole Document	Any additional annexes as needed or appropriate

	PUCT-0001	Rev. 0	Page 28 of 46
Electric Service Emergency Operations Plan			

TABLE 1

ELECTRIC SERVICE EMERGENCY OPERATIONS PLAN DISTRIBUTION LISTING

	Title	Name	Date Access Provided
1	Shift Manager	[REDACTED]	4/11/2022
2	Shift Manager	[REDACTED]	4/11/2022
3	Shift Manager Up-Relief	[REDACTED]	4/11/2022
4	Shift Manager	[REDACTED]	4/11/2022
5	Shift Manager	[REDACTED]	4/11/2022
6	Shift Manager	[REDACTED]	4/11/2022
7	Shift Manager Up-Relief	[REDACTED]	4/11/2022
8	Shift Manager	[REDACTED]	4/11/2022
9	Shift Manager	[REDACTED]	4/11/2022
10	Shift Manager	[REDACTED]	4/11/2022
11	Shift Manager Up-Relief	[REDACTED]	4/11/2022
12	Shift Manager	[REDACTED]	4/11/2022
13	Shift Manager Up-Relief	[REDACTED]	4/11/2022
14	Shift Manager	[REDACTED]	4/11/2022
15	Shift Manager	[REDACTED]	4/11/2022
16	Shift Manager	[REDACTED]	4/11/2022
17	Shift Manager Up-Relief	[REDACTED]	4/11/2022

	PUCT-0001	Rev. 0	Page 29 of 46
Electric Service Emergency Operations Plan			

TABLE 2
APPROVAL AND SUMMARY OF CHANGES

CHANGE NUMBER	PREPARED BY	DATE OF CHANGE	APPROVAL SIGNATURE ⁷	DATE APPROVED
REV. 0	Hector Leon	N/A Original Submission	DocuSigned by: <i>Mike Schaefer</i> C9691D91D6F74D4...	4/12/2022

⁷ This Signature Constitutes Approval and attests that this change supersedes previous versions of the ESEOP.

	PUCT-0001	Rev. 0	Page 30 of 46
Electric Service Emergency Operations Plan			

TABLE 3
EMERGENCY OPERATION PLAN CONTACT LISTING

	Title	Name	PUCT Responder ⁸ (YES/NO)	Contact Type
1	Senior Director, Regulatory Affairs	Bill Barnes	YES	Primary Emergency & Single Point of Contact
2	Managing Senior Counsel	Jennifer Hsia	NO	Secondary Emergency Contact

⁸ This contact information is for the individuals who can immediately address urgent requests from the PUCT during an emergency.

	PUCT-0001	Rev. 0	Page 31 of 46
Electric Service Emergency Operations Plan			

ENCLOSURE 1

AFFIDAVIT EXAMPLE

AFFIDAVIT OF DUDLEY D ZAHN

STATE OF TEXAS §
 §
 COUNTY OF HARRIS §

1. BEFORE ME, the undersigned authority, on this day personally appeared Dudley D Zahn, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Dudley D Zahn. My business address is 910 Louisiana Street, Houston, Texas 77002. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am currently employed as Vice President, Gulf Asset Management with NRG Energy, Inc. ("NRG"). NRG South Texas LP⁹ ("NRG SO TX"), being PGC Certificate No. 20147, is a Power Generation Company (PGC) and a subsidiary of NRG. I am authorized to make this affidavit on behalf of NRG SO TX as its Vice-President.
4. Commensurate with the filing of this Affidavit, NRG SO TX is submitting its Electric Service Emergency Operations Plan ("ESEOP") by and through its operating company, South Texas Project Nuclear Operating Company ("STPNOC").
5. On behalf of NRG SO TX, in connection with the filing of its ESEOP, I swear and affirm that:
 - i. All relevant operating personnel are familiar with, and have received training on, the applicable contents and execution of the ESEOP, and are committed to following the plans and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.
 - ii. The ESEOP has been reviewed and approved by the appropriate NRG executives.
 - iii. NRG SO TX will comply with the requirements for drills of newly adopted 16 TAC § 25.53. For 2022, drills are currently planned, including a drill for May 2022, which notice was provided as required. NRG SO TX will comply with the new requirement for PGCs to provide notification of a drill 30 days prior to that drill.

⁹ NRG South Texas LP is 44% owner and is the Master Qualifying Scheduling Entity (QSE) for the South Texas Project Energy Generation Station (STPEGS) with the other two owners being CPS Energy (40%) and the City of Austin d/b/a Austin Energy (16%).

	PUCT-0001	Rev. 0	Page 32 of 46
Electric Service Emergency Operations Plan			

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

Dudley D Zahn
Vice President, Gulf Asset Management
NRG Energy, Inc.

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

Notary Public in and for the State of Texas

Printed or Stamped Name of Notary

My Commission Expires: _____

	PUCT-0001	Rev. 0	Page 33 of 46
Electric Service Emergency Operations Plan			

ENCLOSURE 2

ATTESTATION EXAMPLE

ATTESTATION OF ANNUAL REVIEW

This ESEOP has been reviewed by the South Texas Project Nuclear Operating Company Management.

In the previous calendar year of XXXX, STPNOC did not make a change to its ESEOP that materially affects how the entity would respond to an emergency.

Additionally, no changes to the list of emergency contacts have been made.

I _____ attest that the above statements are true to the best of my knowledge.

Title:

Name:

Signature:

THIS DOCUMENT AND AN AFFIDAVIT MUST BE FILED WITH THE PUCT BY MARCH 15 OF EACH YEAR COMMENCING IN 2023.

NOTE: An Affidavit is also required to be submitted to the PUCT.

	PUCT-0001	Rev. 0	Page 34 of 46
Electric Service Emergency Operations Plan			

ENCLOSURE 3

DESCRIPTION OF CONTENT

STPEGS Emergency Plan (Communications) – A plan that outlines a communication plan for communicating and reporting of emergency plant events to the appropriate levels of South Texas Project Co-Owner Management and, when applicable, for communicating and reporting of emergency events to external media, state offices, and governmental agencies.

Extreme Cold Weather Guidelines Procedure and Winter Readiness Program Procedure – Plant procedures for responding to a cold weather emergency and preparing for the cold weather season. Winter readiness refers to the preparation required to ensure reliable operation during the cold weather season and winter weather emergencies. The cold weather season is defined to be from October 31 through March 31.

Summer Peak Period Readiness Guideline – Guideline for summer readiness refers to the preparation required to ensure reliable operations during the summer peak period, defined as being the period from June 1 through September 30.

Water Shortage Procedures – Plant procedures that addresses supply shortages of water. The purpose of this Water Shortage Plan is to explain procedures for enduring a longstanding drought and actions that will be taken to allow for maximum uses of resources available during such a time.

Restoration of Service Procedures – Plant procedures that identify steps intended to restore to service a generation resource that failed to start or that tripped offline.

Pandemic Response Guideline – Guideline to minimize employee exposure and maintain essential plant operations in the event of a pandemic and applies to all facilities operated by STPNOC. In response to an epidemic, STPNOC would utilize this pandemic response guideline, as needed.

Site Preparation for Tropical Storm or Hurricane Guideline and Hurricane Plan Procedure – Plant guideline and procedures that provide a hurricane readiness plan that refers to the preparation required to ensure reliable plant operation during hurricane season, defined to be from June 1 through November 30.

Cyber Security Incident Response Procedure and Security of STPEGS Procedure – Plant procedures that provide guidance in response to a disruption impacting, or with the potential to impact, STPNOC employees or plant operations, specifically during cyber security and physical security incidents.

STPEGS Emergency Plan (Radiological Emergency) – A comprehensive emergency plan required under federal regulations that is focused on ensuring that STPNOC emergency response can provide adequate protective measures in the event of a radiological emergency.

	PUCT-0001	Rev. 0	Page 35 of 46
Electric Service Emergency Operations Plan			

ENCLOSURE 4

PUCT REQUIREMENTS TO STPNOC PROCEDURES MATRIX

Section	Sub-Section	16 TAC §25.53 Requirement	Procedure/Page	Annex
(c) Filing Requirements	(c)(1)	An entity must file an emergency operations plan (EOP) and executive summary under this section by April 15, 2022. Notwithstanding the foregoing, a municipally owned utility must provide its EOP and executive summary in the manner prescribed by the commission in this paragraph no later than June 1, 2022.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 9, Section 10.2.	No Annex
(c) Filing Requirements	(c)(1)(A)(i)	An entity must file with the commission: an executive summary that: (a) describes the contents and policies contained in the EOP; (b) includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule; (c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and (d) contains the affidavit required under subparagraph (c)(4)(C) of this section.	PUCT-0001 - Electric Service Emergency Operations Plan: (a) Page 3, Section 1.0 (b) Page 3, Section 1.0 (c) Page 3, Section 1.0 (d) Page 31, Enclosure 1.	No Annex
(c) Filing Requirements	(c)(1)(A)(ii)	A complete copy of the EOP with all confidential portions removed.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.1.2.	No Annex
(c) Filing Requirements	(c)(1)(B)	For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.1.3.	No Annex
(c) Filing Requirements	(c)(1)(D)	An entity must make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.1.3.	No Annex

	PUCT-0001	Rev. 0	Page 36 of 46
Electric Service Emergency Operations Plan			

(c) Filing Requirements	(c)(3)	An entity must continuously maintain its EOP. Beginning in 2023, an entity must annually update information included in its EOP no later than March 15 under the following circumstances:	PUCT-0001 - Electric Service Emergency Operations Plan, Page 9, Section 10.3.	No Annex
(c) Filing Requirements	(c)(3)(A)	<p>An entity that in the previous calendar year made a change to its EOP that materially affects how the entity would respond to an emergency must:</p> <p>(i) file with the commission an executive summary that:</p> <p>(a) describes the changes to the contents or policies contained in the EOP;</p> <p>(b) includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;</p> <p>(c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and</p> <p>(d) contains the affidavit required under subparagraph (c)(4)(C) of this section.</p> <p>(ii) file with the commission a complete, revised copy of the EOP with all confidential portions removed; and</p> <p>(iii) submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.</p>	PUCT-0001 - Electric Service Emergency Operations Plan, Page 9, Section 10.3.	No Annex

	PUCT-0001	Rev. 0	Page 37 of 46
Electric Service Emergency Operations Plan			

(c) Filing Requirements	(c)(3)(B)	<p>An entity that in the previous calendar year did not make a change to its EOP that materially affects how the entity would respond to an emergency must file with the commission:</p> <p>(i) a pleading that documents any changes to the list of emergency contacts as provided under subparagraph (c)(4)(B) of this section;</p> <p>(ii) an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating the entity did not make a change to its EOP that materially affects how the entity would respond to an emergency; and</p> <p>(iii) the affidavit described under subparagraph (c)(4)(C) of this section.</p>	<p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.2</p> <p>(i) PUCT-0001 - Electric Service Emergency Operations Plan, Page 29, Table 2, Approval and Summary of Changes.</p> <p>(ii) PUCT-0001 - Electric Service Emergency Operations Plan, Page 33, Enclosure 2, Attestation Example.</p> <p>(iii) PUCT-0001 - Electric Service Emergency Operations Plan, Page 31, Enclosure 1, Affidavit Example.</p>	No Annex
(c) Filing Requirements	(c)(3)(C)	<p>An entity must update its EOP, or other documents required under this section if commission staff determines that the entity's EOP or other documents do not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency. If directed by commission staff, the entity must file its revised EOP or other documentation, or a portion thereof, with the commission and, for entities with operations in the ERCOT power region, with ERCOT.</p>	<p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.3</p> <p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.1.2 and 10.3.1.3.</p>	No Annex
(c) Filing Requirements	(c)(3)(E)	<p>An entity must make a revised unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.</p>	<p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 10.3.1.3.</p>	No Annex
(c) Filing Requirements	(c)(4)	<p>In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:</p>		No Annex

	PUCT-0001	Rev. 0	Page 38 of 46
Electric Service Emergency Operations Plan			

(c) Filing Requirements	(c)(4)(A)	A record of distribution that contains the following information in table format: (i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and (ii) dates of access to or training on the EOP, as appropriate.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 28, Table 1, Electrical Service Emergency Operations Plan Distribution Listing.	No Annex
(c) Filing Requirements	(c)(4)(B)	A list of primary and, if possible, backup emergency contacts for the entity, including identification of specific individuals who can immediately address urgent requests and questions from the commission during an emergency.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 30, Table 3, Emergency Operation Plan Contact Listing.	No Annex
(c) Filing Requirements	(c)(4)(C)	An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following: (i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency; (ii) the EOP has been reviewed and approved by the appropriate executives; (iii) drills have been conducted to the extent required by subsection (f) of this section; (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed; (v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and (vi) the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management	PUCT-0001 - Electric Service Emergency Operations Plan, Page 31, Enclosure 1, Affidavit Example.	No Annex

	PUCT-0001	Rev. 0	Page 39 of 46
Electric Service Emergency Operations Plan			

		officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.		
(d) Information to be included in the emergency operations plan	(d)	An entity's EOP must address both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies, including those listed in subsection (e) of this section. An EOP may consist of one or multiple documents. Each entity's EOP must include the information identified below, as applicable. If a provision in this section does not apply to an entity, the entity must include in its EOP an explanation of why the provision does not apply.	PUCT-0001 - Electric Service Emergency Operations Plan, Pages: Whole document	No Annex
(d) Information to be included in the emergency operations plan	(d)(1)	An approval and implementation section that: (A) introduces the EOP and outlines its applicability; (B) lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP; (C) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (c)(1) of this section; (D) provides a dated statement that the current EOP supersedes previous EOPs; and (E) states the date the EOP was most recently approved by the entity.	PUCT-0001 - Electric Service Emergency Operations Plan (A) Page 5, Section 2.0. (B) Page 5, Section 4.0 (C) Page 29, Table 2, Approval and Summary of Changes (D) Page 29, Table 2, Approval and Summary of Changes (E) Page 29, Table 2, Approval and Summary of Changes	No Annex
(d) Information to be included in the emergency operations plan	(d)(2)	A communication plan	EP-0001.000 - South Texas Project Electric Generating Station (STPEGS) Emergency Plan, Section 5, Page 23 PUCT-0001 - Electric Service Emergency Operations Plan, Page 7, Section 7.0.	No Annex

	PUCT-0001	Rev. 0	Page 40 of 46
Electric Service Emergency Operations Plan			

(d) Information to be included in the emergency operations plan	(d)(2)(B)	An entity with generation operations must describe the procedures during an emergency for communicating with the media; the commission; OPUC; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator.	EP-0001.000 - South Texas Project Electric Generating Station (STPEGS) Emergency Plan, Section 5, Page 23 PUCT-0001 - Electric Service Emergency Operations Plan, Page 3, Section 1.1.4.	No Annex
(d) Information to be included in the emergency operations plan	(d)(3)	A plan to maintain pre-identified supplies for emergency response.	ZV-0029 – Site Preparation for Tropical Storm or Hurricane, Page 9 OPMP02-ZA-0004 – Maintenance Department Severe Weather Program, Page 13 OPGP03-ZA-0022 – Facilities Department Severe Weather Program, Page 14 OPGP03-ZA-0519 – Project Department Severe Weather Program, Page 12 OPOP01-ZA-0001 – Plant Operations Department Administrative Guidelines, Pages: Whole Document PUCT-0001 - Electric Service Emergency Operations Plan, Page 8, Section 8.4.	No Annex
(d) Information to be included in the emergency operations plan	(d)(4)	A plan that addresses staffing during emergency response.	OPGP03-ZV-0002 – Hurricane Plan, Pages: Whole Document. PUCT-0001 - Electric Service Emergency Operations Plan, Page 7, Section 6.0.	No Annex

	PUCT-0001	Rev. 0	Page 41 of 46
Electric Service Emergency Operations Plan			

(d) Information to be included in the emergency operations plan	(d)(5)	A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP.	<p>OPGP03-ZV-0001 – Severe Weather Plan, Pages: Whole Document</p> <p>OPGP03-ZV-0002 – Hurricane Plan, Pages: Whole Document</p> <p>OPGP03-ZV-0003 – Hurricane Recovery Plan, Pages: Whole Document</p> <p>OPMP02-ZA-0004 – Maintenance Department Severe Weather Program, Pages: Whole Document</p> <p>OPGP03-ZA-0022 – Facilities Department Severe Weather Program, Pages: Whole Document</p> <p>OPGP03-ZA-0519 – Project Department Severe Weather Program, Pages: Whole Document</p> <p>OPGP05-ZN-0001 – Preparation of Requests for Enforcement Discretion, Pages: Whole Document</p> <p>OPOP04-ZO-0002 – Natural or Destructive Phenomena Guidelines, Pages: Whole Document</p> <p>ZV-0029 – Site Preparation for Tropical Storm or Hurricane, Pages: Whole Document</p> <p>OPOP01-ZO-0004 – Extreme Cold Weather Guidelines, Pages: Whole Document</p> <p>OPGP03-ZV-0004 – Winter Readiness Program, Pages: Whole Document</p> <p>WCG-0011 – Summer Peak Period Readiness, Pages: Whole Document</p>	No Annex
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	PUCT-0001	Rev. 0	Page 42 of 46
Electric Service Emergency Operations Plan			

			<p>OPOP02-CW-0001 – Circulating Water System Pump Operations, Page 7</p> <p>WCG-0002 – Work Management Scheduling, Pages: Whole Document</p> <p>OPGP03-ZO-0045 – CenterPoint Energy Real Time Operations Emergency Operations Plan, Pages: Whole Document</p> <p>OPSP03-ZQ-0028 – Operator Logs, Pages: Whole Document</p> <p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 8, Section 8.2.2.1.</p>	
(d) Information to be included in the emergency operations plan	(d)(6)	Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 10, Section 11.0.	No Annex
(e) Annexes to be included in the emergency operations plan		(2) An electric cooperative, an electric utility, or a municipally owned utility that operate a generation resource in Texas; and a PGC must include the following annexes for its generation resources other than generation resources authorized under PURA §39.918:		No Annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(A)	A weather emergency annex that includes: (i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title; (ii) verification of the adequacy and operability of fuel switching equipment, if installed; and (iii) a checklist for generation resource personnel to use during a cold or hot weather emergency response that	<p>WCG-0002 – Work Management Scheduling, Pages: Whole Document</p> <p>WCG-0011 – Summer Peak Period Readiness, Pages: Whole Document</p> <p>OPGP03-ZV-0004 – Winter Readiness Program, Pages: Whole Document</p>	Weather Emergency annex

	PUCT-0001	Rev. 0	Page 43 of 46
Electric Service Emergency Operations Plan			

		includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.	<p>OPOP01-ZO-0004 – Extreme Cold Weather Guidelines, Pages: Whole Document, including checklist pages 46-49.</p> <p>OPOP02-CW-0001 – Circulating Water System Pump Operations, Page 7.</p> <p>1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole Document</p>	
(e) Annexes to be included in the emergency operations plan	(e)(2)(B)	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	<p>OPOP02-EW-0001 – Essential Cooling Water Operations, Pages: Whole Document</p> <p>OPOP02-WW-0001 – Well Water System Operation, Pages: Whole Document</p> <p>OPOP04-ZO-0002 – Natural or Destructive Phenomena Guidelines, Pages: Whole Document</p> <p>OPOP02-CW-0001 – Circulating Water System Pump Operations, Pages: Whole Document</p> <p>OPOP02-LM-0001 – Reservoir Makeup Pumping Facility, Page: 60 - Addendum 3 – Main Cooling Reservoir Water Delivery Plan during Drought Conditions</p>	Water shortage annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(C)	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	<p>WCG-0001 - Work Screening and Processing, Pages: Whole document</p> <p>WCG-0007 – Forced Outage Guideline Organization and Responsibilities, Pages: Whole Document</p> <p>OPOP03-ZG-0008 – Power Operations, Pages: Whole Document</p>	A restoration of service annex

	PUCT-0001	Rev. 0	Page 44 of 46
Electric Service Emergency Operations Plan			

			<p>OPGP03-ZO-0022 – Post-Trip Review, Pages: Whole Document</p> <p>OPOP03-ZG-0003 – Secondary Plant Startup, Pages: Whole Document</p> <p>OPOP03-ZG-0005 – Plant Startup to 100%, Pages: Whole Document</p>	
(e) Annexes to be included in the emergency operations plan	(e)(2)(D)	A pandemic and epidemic annex;	<p>1 STPNOC PANDEMIC-0001 – STPNOC Pandemic Response Guideline, Pages: Whole Document</p> <p>1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole document</p>	Pandemic and epidemic annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(E)	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	<p>OPOP04-ZO-0002 – Natural or Destructive Phenomena Guidelines, Pages: Whole Document</p> <p>OPGP03-ZA-0519 – Project Department Severe Weather Program, Pages: Whole Document</p> <p>ZV-0029 – Site Preparation for Tropical Storm or Hurricane, Pages: Whole Document</p> <p>1 STPNOC BCP-0001 - STPNOC Business Continuation Plan (BCP) Guideline, Pages: Whole Document</p> <p>OPGP03-ZV-0003 – Hurricane Recovery Plan, Pages: Whole Document</p> <p>OPGP03-ZV-0002 – Hurricane Plan, Pages: Whole Document</p>	Hurricane annex

	PUCT-0001	Rev. 0	Page 45 of 46
Electric Service Emergency Operations Plan			

(e) Annexes to be included in the emergency operations plan	(e)(2)(F)	A cyber security annex;	OPGP03-ZS-0014 - Cyber Security Incident Response, Pages: Whole Document	Cyber security annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(G)	A physical security incident annex; and	OPGP03-ZA-0107 – Security of the South Texas Project Electric Generating Station, Pages: Whole Document	Physical security incident annex
(e) Annexes to be included in the emergency operations plan	(e)(2)(H)	Any additional annexes as needed or appropriate to the entity's particular circumstances.	EP-0001.000, South Texas Project Electric Generating Station (STPEGS) Emergency Plan, Pages: Whole Document	Any additional annexes as needed or appropriate
(f) Drills		<p>An entity must conduct or participate in at least one drill each calendar year to test its EOP. Following an annual drill, the entity must assess the effectiveness of its emergency response and revise its EOP as needed. If the entity operates in a hurricane evacuation zone as defined by TDEM, at least one of the annual drills must include a test of its hurricane annex. An entity conducting an annual drill must, at least 30 days prior to the date of at least one drill each calendar year, notify commission staff, using the method and form prescribed by commission staff on the commission's website, and the appropriate TDEM District Coordinators, by email or other written form, of the date, time, and location of the drill. An entity that has activated its EOP in response to an emergency is not required, under this subsection, to conduct or participate in a drill in the calendar year in which the EOP was activated.</p>	<p>Security Instruction 2501 – Tactical Drill and Force on Force Exercise Program, Pages: Whole Document</p> <p>OPGP03-ZV-0002 – Hurricane Plan, Pages: Whole Document</p> <p>PUCT-0001 - Electric Service Emergency Operations Plan, Page 6, Section 5.0.</p>	No Annex

	PUCT-0001	Rev. 0	Page 46 of 46
Electric Service Emergency Operations Plan			

(g) Reporting requirements		Upon request by commission staff during an activation of the State Operations Center by TDEM, an affected entity must provide updates on the status of operations, outages, and restoration efforts. Updates must continue until all incident-related outages of customers able to take service are restored or unless otherwise notified by commission staff. After an emergency, commission staff may require an affected entity to provide an after action or lessons learned report and file it with the commission by a date specified by commission staff.	PUCT-0001 - Electric Service Emergency Operations Plan, Page 8, Section 8.2.10.	No Annex
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ALL PROCEDURES CITED IN ANNEXES 1 – 8
OF THIS ELECTRIC SERVICE EMERGENCY
OPERATIONS PLAN
HAVE BEEN REMOVED DUE TO
CONFIDENTIALITY



2022.04.13 Affidavit NRG SO TX signed by SZ notarized.pdf

DocVerify ID: E0483B03-ACCB-4B65-8C47-034B5A70109B
 Created: April 13, 2022 13:10:30 -6:00
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E-Signature Summary

E-Signature 1: Dudley D Zahn (DDZ)

April 13, 2022 14:25:51 -6:00 [6EBC456626F6] [149.19.42.26]
 skip.zahn@nrg.com (Principal)

E-Signature Notary: Elizabeth Wolford (EW)

April 13, 2022 14:25:51 -6:00 [870F18A0C1EA] [149.19.42.26]
 liz.wolford@nrg.com
 I, Elizabeth Wolford, did witness the participants named above electronically sign this document.



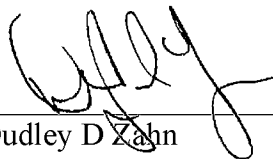
AFFIDAVIT OF DUDLEY D. ZAHN

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

1. BEFORE ME, the undersigned authority, on this day personally appeared Dudley D. Zahn, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Dudley D. Zahn. My business address is 910 Louisiana Street, Houston, Texas 77002. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am currently employed as Vice President, Gulf Asset Management with NRG Energy, Inc. ("NRG"). NRG South Texas LP¹ ("NRG SO TX"), being PGC Certificate No. 20147, is a Power Generation Company (PGC) and a subsidiary of NRG. I am authorized to make this affidavit on behalf of NRG SO TX as its Vice-President.
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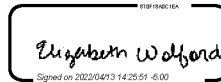
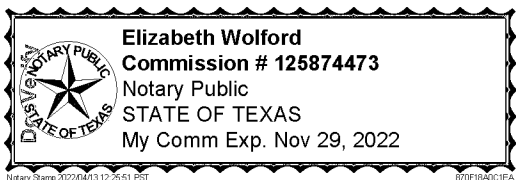
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- iv. The ESEOP, or a summary, will be distributed to local jurisdictions, as deemed necessary.
- v. NRG maintains robust business continuity plans that cover corporate functions, plant operations, and wholesale operations. These plans clearly outline plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of this affidavit, assigned personnel have initiated the training process or commenced or completed the training. All training will be completed within 90 days of this affidavit.



Dudley D Zahn
Vice President, Gulf Asset Management
NRG Energy, Inc.

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



Notary Public in and for the State of Texas

Elizabeth Wolford
Printed or Stamped Name of Notary

My Commission Expires: November 29th, 2022

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