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Alisha Adams
(512) 236-2340 (Direct Dial)
(512) 691-4437 (Direct Fax)
aadams@jw.com

May 20, 2022

Via eFile

Public Utility Commission of Texas
PO Box 13326
Austin, Texas 78111-3326

Re: PUC Docket 53385, *Project to Submit Emergency Operations Plans and Related Documents Under 16 TAC § 25.53*

Dear Commission:

Branch Energy Holdings, Inc. ("Branch Energy") files this corrected Emergency Operations Plan, which marks additional authorized personnel contact information as confidential. Accordingly, please void the filing made by Branch Energy as Item #249 in the aforementioned docket. Please let me know if there is anything other information you may need.

Regards,

/s/ Alisha Adams

Alisha Adams

Attorney for Branch Energy Holdings, Inc.

Enclosures

Branch Energy Emergency Operations Plan

I. Executive Summary (16 Tex. Admin. Code (TAC) § 25.53(c)(1)(A)(i))

A. Purpose

This executive summary has been developed by Branch Energy Holdings, Inc. (Branch Energy), a retail electric provider, to ensure compliance with Chapter 25 of the Public Utility Commission of Texas (PUC), Substantive Rules Applicable to Electric Service Providers, Subchapter C, Quality of Service, 25.53 (Electric Service Emergency Operations Plans).

B. Content and Policies

Branch Energy maintains an emergency operations plan (EOP) to ensure adequate protections are available for customers in case of emergencies, including natural disasters, curtailments, or major interruptions in electrical service. This EOP sets forth the organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts. Branch Energy is a remote-first retail electric provider (REP) with staff located around the world. Accordingly, the entire infrastructure is built to allow all employees to work from home at any time, from any location, from any device, which greatly aids flexibility in times of emergencies. As described in more detail in the EOP, all of Branch Energy's communication infrastructure is built on distributed cloud platforms that would not be disrupted by any regional emergencies. As described herein, there are multiple methods for the public, customers, media, the PUC, and OPUC to contact Branch Energy in case of emergencies, which are monitored regularly. This EOP is reviewed by Branch Energy personnel on an annual basis and will be updated as needed. Drills testing the provisions included in the EOP are conducted on an annual basis.

C. Page and Rule References

Below, please find references to specific sections and page numbers of the EOP that correspond with the 16 TAC § 25.53 requirements.

Section	Rule Section	Page
Executive Summary	16 TAC § 25.53(c)(1)(A)	1
Record of Distribution	16 TAC § 25.53(c)(4)(A)	2-3
Primary Contacts	16 TAC § 25.53(c)(4)(B)	3
Affidavit	16 TAC § 25.53(c)(4)(C)	3; Attachment 1
Approval and Implementation	16 TAC § 25.53(d)(1)	4
Communication Plan	16 TAC § 25.53(d)(2)	4-7

Supplies for Emergency Response	16 TAC § 25.53(d)(3)	7
Staffing During Emergency Response	16 TAC § 25.53(d)(4)	7
Identification of Weather Related Hazards and EOP Activation	16 TAC § 25.53(d)(5)	7-8
Identification of Relevant Annexes	16 TAC § 25.53(d)(6)	8
Pandemic and Epidemic Annex	16 TAC § 25.53(e)(3)(A)	8; Attachment 2
Hurricane Annex	16 TAC § 25.53(e)(3)(B)	8; Attachment 3
Cyber Security Annex	16 TAC § 25.53(e)(3)(C)	8; Attachment 4
Physical Security Incident Annex	16 TAC § 25.53(e)(3)(D)	8; Attachment 5
Additional Annexes as appropriate	16 TAC § 25.53(e)(3)(E)	8; Not applicable
Drills	16 TAC § 25.53(f)	8-9

D. Record of Distribution

Name	Title	Training Date
Alex Ince-Cushman	CEO	April 14, 2022
Bryan Neyedli	Developer	April 14, 2022
Claire Johansen	Developer	April 14, 2022
Curtis Redgate	Data Engineer	April 14, 2022
Daniel MacDonald	President	April 14, 2022
Girish Sharma	Technical Operator	April 14, 2022
Gonzalo Martín-Roldán	Data Engineer	April 14, 2022
Gustavo Leivas	Developer	April 14, 2022
Jason Duthie	Care Manager	April 14, 2022
Kara Laudi	Technical Operator	April 14, 2022
Matthew Badger	Head of Data Science	April 14, 2022

Miguel Morris	Outsourced Care Manager	April 14, 2022
Nima Rabiee nia	Manager Operation	April 14, 2022
Pam Santos	Data Scientist	April 14, 2022
Robin Ayme	Head of Product	April 14, 2022
Todd Burgess	CTO	April 14, 2022
Tushar Narayan	Engineering Lead	April 14, 2022

E. Primary and Backup Emergency Contacts

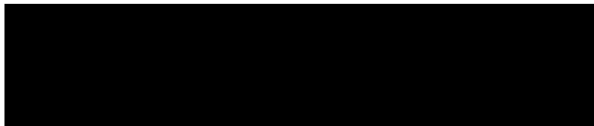
Below, please find the primary and backup contacts for Branch Energy, including specific individuals who can immediately address urgent requests from the commission during an emergency.

Primary Contacts:

Alexander Ince-Cushman, Chief Executive Officer
Office No: (832) 583-3901
Email: alex@branchenergy.com

Daniel MacDonald, President
Office No: (832) 538-3719
Email: daniel@branchenergy.com

Backup Contacts:



Todd Burgess, Chief Technology Officer
Office No: (832) 583-2794
Email: todd@branchenergy.com

F. Affidavit

Please see the affidavit provided in relation to 16 TAC § 25.53(c)(4)(C) included as Attachment 1 here to.

II. Emergency Operations Plan

A. Approval and Implementation Section (16 TAC § 24.53(d)(1))

1. Introduction of the EOP and its Applicability

[REDACTED]

2. Individuals responsible for maintaining, implementing and changing the EOP

[REDACTED]

3. Revision Control Summary

[REDACTED]

4. Superseding of previous EOPs

[REDACTED]

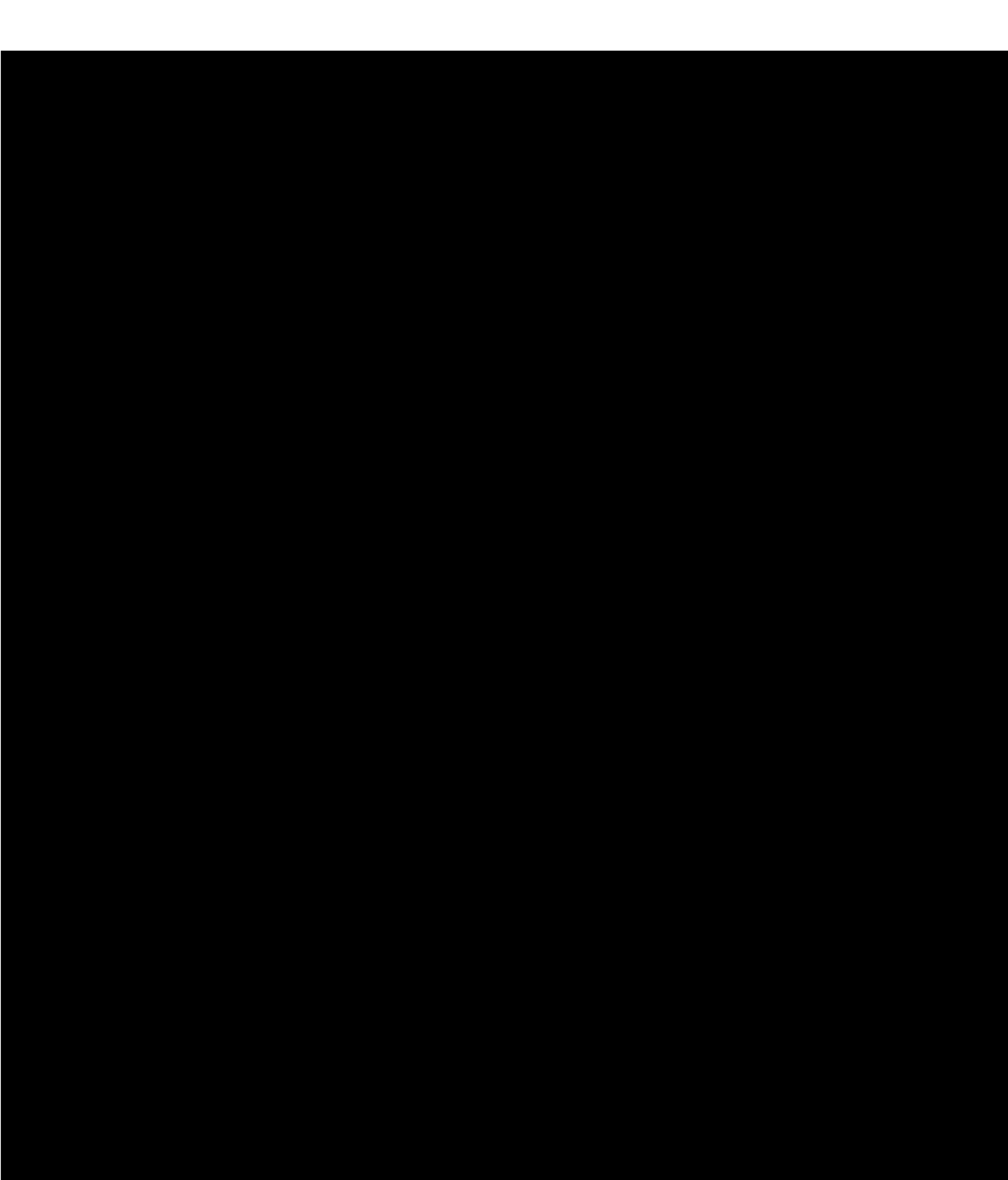
5. Date of EOP approval

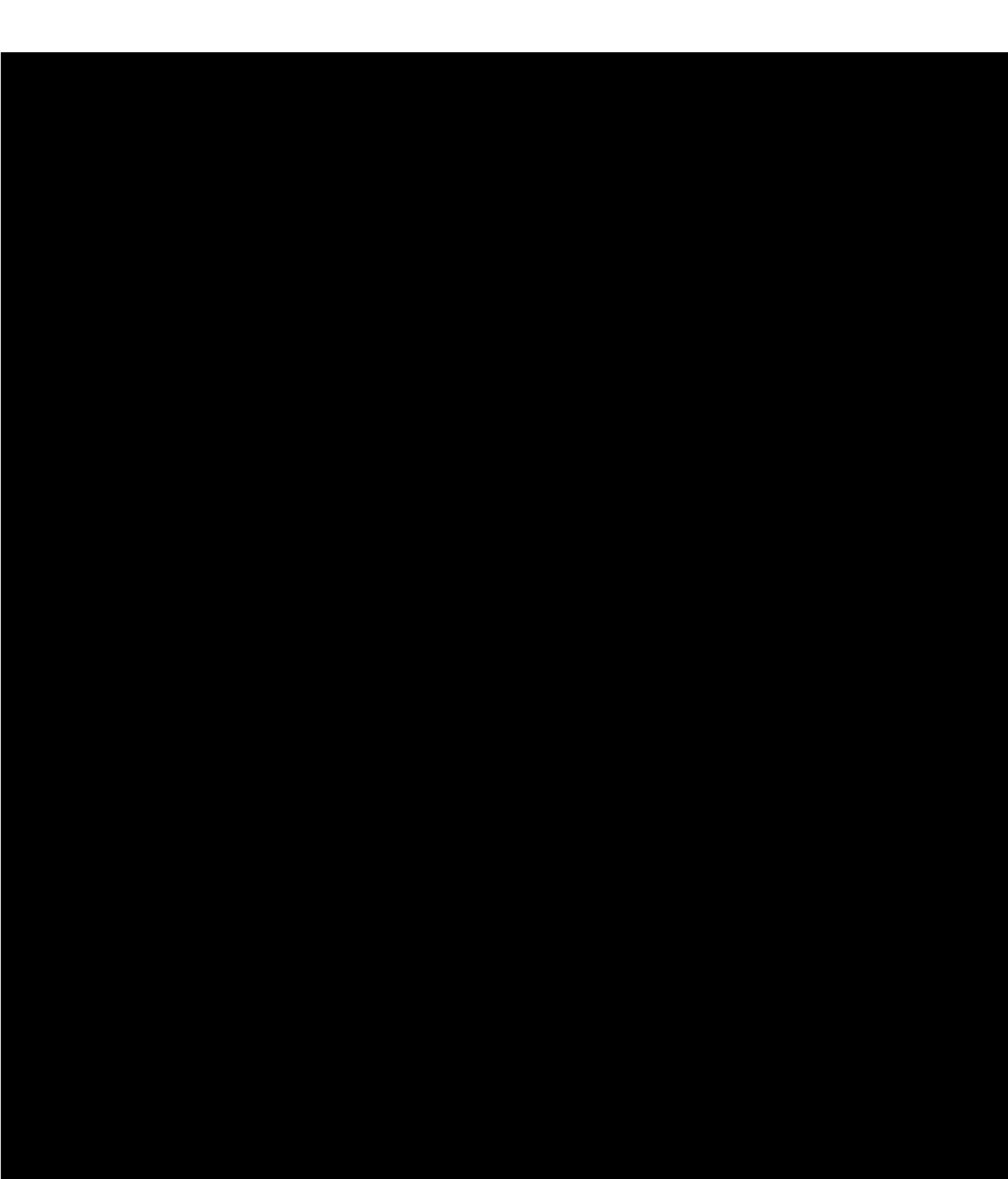
[REDACTED]

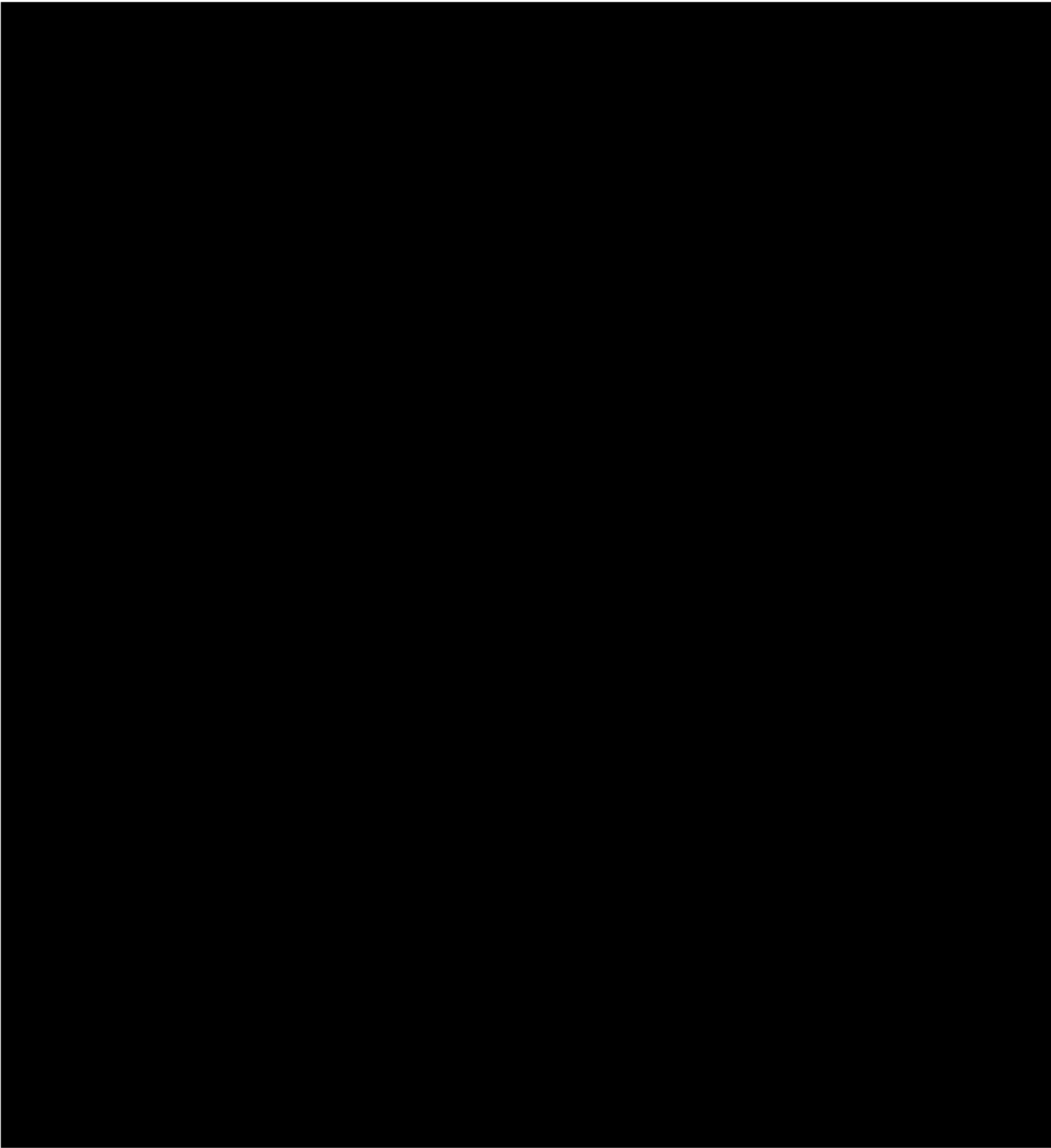
B. Communication Plan (16 TAC § 24.53(d)(2))

1. Communication Procedures (16 TAC § 24.53(d)(2)(C))

[REDACTED]







[REDACTED]

C. Relevant Annexes (16 TAC § 24.53(e)(3))

Branch Energy provides the relevant annexes for REPs described in 16 TAC § 24.53(e)(3).

1. Pandemic and Epidemic Annex

[REDACTED]

2. Hurricane Annex

[REDACTED]

3. Cyber Security Annex

[REDACTED]

4. Physical Security Incident Annex

[REDACTED]

5. Any additional annexes as needed or appropriate to Branch Energy's particular circumstances

[REDACTED]

D. Drills (16 TAC § 24.53(f))

[REDACTED]



Attachment 1

State of N/A §
§
County of N/A §

BEFORE ME, the undersigned Notary Public in and for the State of N/A, personally appeared Alexander Ince-Cushman, the affiant, whose identity is known to me. On this day, the undersigned affiant swore an oath that the following facts are true:

1. My name is Alexander Ince-Cushman. I am over 18 years of age, of sound mind, and capable of making this affidavit. I attest that the facts in this affidavit are within my personal knowledge and are true and correct.
2. My title is Chief Executive Officer. I am an officer with binding authority over Branch Energy Holdings, Inc. ("Branch Energy").
3. All relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan ("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.
4. The EOP has been reviewed and approved by the appropriate executives of Branch Energy.
5. Drills will be conducted to the extent required by 16 Tex. Admin. Code § 25.53(f) on May 19, 2022.
6. Pursuant to Branch Energy's EOP, it is not necessary to distribute the EOP or an appropriate summary of the EOP to any local jurisdictions at this time. I affirm that if deemed necessary at a later date, Branch Energy shall provide a summary of the EOP to local jurisdictions as needed.
7. Branch Energy's business continuity plan provides that employees shall return to normal operations after disruptions caused by an incident or an emergency.
8. Branch Energy's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System ("NIMS") training by May 19, 2022.

Alexander Ince-Cushman

Alexander Ince-Cushman

Subscribed and sworn before me on this 15th day of April, 2022.



Trina Trinea Bailey

REGISTRATION NUMBER
7955883

COMMISSION EXPIRES
December 31, 2025

Trina Trinea Bailey
NOTARY PUBLIC IN AND FOR
THE STATE OF Virginia

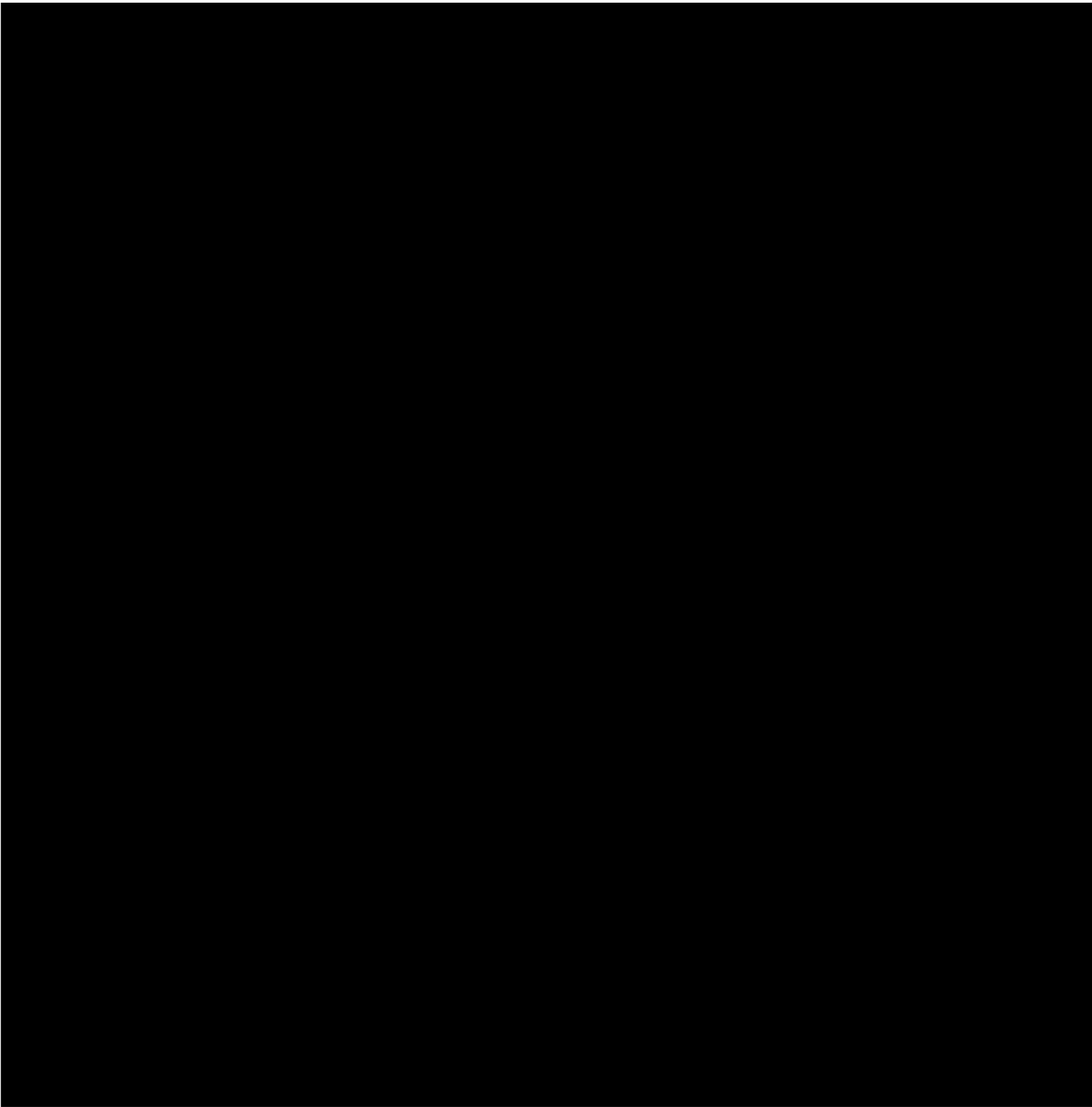
County Of Virginia

Attachment 1

My Commission Expires on: 12/31/2025

Attachment 2

Pandemic and Epidemic Annex



Attachment 3

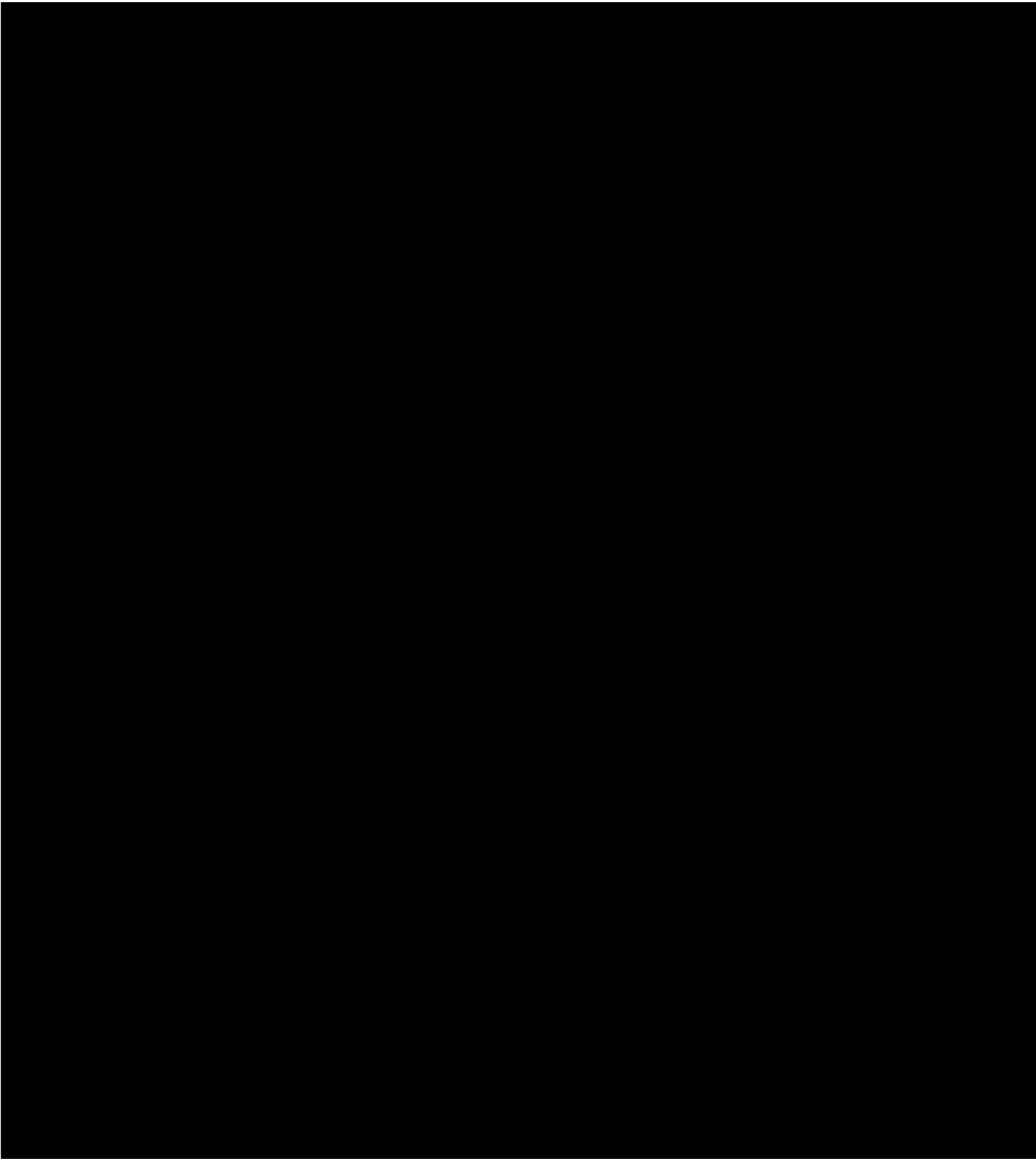
Hurricane Annex



Attachment 4

Cyber Security Annex





Attachment 5

Physical Security Incident Annex

