Filing Receipt

LEA COUNTY ELECTRIC COOPERATIVE

EMERGENCY OPERATIONS PLAN

April 1, 2022

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1) **Approval and Implementation Section**
   a) This Emergency Operations Plan (EOP) and its applicability to facilities, employees, and contractors is intended to protect life and property and ensure continuity of adequate electric service during emergencies.
   b) The individuals listed below are responsible for maintaining and implementing this EOP and possess the requisite authority to change this EOP.
   c) EOP Revision History

Date	Individual Making Edits	Reason/Comments
02/21/2022	████████	Annual review
4/1/2022	████████	Add pertinent information for LCEC

   d) As of <u>April 1, 2022</u>, this EOP supersedes all previous EOPs and EPPs.

   e) This EOP was most recently updated and approved on <u>April 1, 2022</u>.

2) **Record of Distribution**
   a) This document has been distributed to the following individuals:

Date of Distribution	Distributed to: Name	Title
	Bobby Kimbro	Manager of Engineering and Operations
	████████	Director of Line Operations
	████████	Director of Planning and Distribution
	████████	Manager of Administrative Services/Compliance/Safety/Facilities
	████████	Manager of IT/Communications
	████████	Manager of Marketing and Member Services
	████████	Manager of Accounting and Customer Services
	████████	Safety Coordinator
	Web page	For all employees to access

3) Emergency Contacts

LCEC Emergency Contacts			
Title	**Name**	**Mobile Phone**	**Extension**
General Manager	**Bobby Ferris**	**575-361-6277**	
Manager of Engineering & Operations	**Bobby Kimbro**	**575-704-2465**	
Director of Line Operations	███████	███████	
Manager of IT/Communications	██████	██████	
Manager of Marketing and Member Services	██████	██████	
Manager of Accounting and Customer Services	████	██████	
Manager of Administrative Services/Compliance/Safety/Facilities	███████	██████	
Director of Distribution and System Planning	███████	██████	
Supervisor of Staking and GIS	███████	██████	

4) Affidavit
   a) Affidavit from Bobby Ferris, General Manager attached.

5) Communication Plan
   a) LCEC may use their web page, radio, phone message and/or text to communicate with the public, media, customers, and the commission as well as the process for handling complaints during an emergency.

6) Pre-stocking of Supplies

The following items are strongly dependent on the warehouse and pole yard for normal operating conditions and during emergency conditions.

- Storage and maintenance of equipment and vehicles such as digger derricks, aerial devices, stringing equipment, small vehicles, forklifts, etc.
- Storage and inventory of materials such as poles, cross arms, transformers, wire, etc.
- Storage and inventory of tools such as hand tools, personal protective equipment, cover-up, and other protective devices

- Safeguarding of assets including building, equipment, and inventory
- Non-interruption of utilities for both cooperative property and members, if applicable, including electric, gas, propane, water, and telephone
- General maintenance of warehouse facilities including structural integrity, sanitary facilities (restrooms, port-a-pots, washroom/showers), trash disposal (waste, scrap material, hazardous materials, etc.)
- Storage and inventory of IT/Communications related equipment

7) **Staffing During Emergencies**
   - The issue of personnel is a major variable in disaster recovery and other emergencies. Assess and evaluate number of personnel available for duty, resources available and location of operation.
   - LCEC will assess and evaluate availability, condition and needs of employees due to impact on employees' homes and families directly affected by loss of personal property and shelter or pandemic.
   - LCEC will assess and evaluate the need and process of hiring new employees to fill the spots left by injuries, fatalities, or illness.
   - LCEC will assess and evaluate the use of employees from neighboring cooperatives if needed.
   - Cross-training and job-sharing will assist in mitigating potential losses.
   - In the event of an emergency and the potential for loss of personnel, the following items are important to the continuity of service:
       - Safety of employees and their families
       - Preparation for any loss of personnel
       - Prioritize business functions
       - Action plans developed
   - Administration of Cooperative's safety program & policies, emergency preparedness plan and investigations.
   - Adhere to federal and state official's mandates and recommendations.
   - Assist Accounting Services with records access and management for payroll, benefits, workers' compensation/disability, risk management, certificates of insurance, property, organizational chart, pay rates and board policies.
   - The following items are strongly dependent to the smooth operation of the business during normal operating conditions and/or emergency conditions:
       - Job descriptions including documented, detailed procedures on how to do each job are available in hard copy format and on the network which is backed up weekly. Wage and salary benefits, carriers documented and backed up weekly.

- Specific "key" positions are defined and cross training/job sharing for these positions is provided. ████████████████████████

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- Working relationship with contractors, municipals, IOUs, retired employees, and other cooperatives are maintained.
- Employees are insured through the Cooperative's benefit programs.
- Legal issues involving insurance, workers' compensation, etc., regarding permanent and temporary employees, will be addressed with carriers and our corporate attorney.
- Identification of a grief counselor, if necessary
- Location of lodging and food resources
- Communicate with employees and their families
- Safety contacts and resources
- Workers' Compensation contacts and resources
- Property/Risk Management insurance contacts and resources
- Coordinate environmental issues

8) Weather Related Hazards

a) Weather forecasts through weather apps

Alerts from Texas Division of Emergency Management

SCADA notifications

National Weather Service

b) Roll call initiated

One Crew always on standby

Notification to key individuals

Group text

- Cold Weather Emergency
  - Extreme cold weather can lead to higher power consumption by use of heaters by both commercial and residential members. LCEC has a 24-hour manned dispatch center where the loads are monitored. If loads increase on a particular line or substation our dispatchers can direct switching to minimize the impacts of

the higher power demands. In addition, disconnects to members are discontinued during extreme cold weather.

- System Operations maintains a list of peak loads for all our LCEC substations and transmission facilities. If loads increase on a particular line or substation our dispatchers can direct switching to minimize the impacts of the higher power demands.
- LCEC will hold both pre-weather and post-weather emergency meetings when extreme cold weather is expected to impact the LCEC service territory to identify opportunities for improvement.
- Hot Weather Emergency
  - Extreme hot weather can lead to higher power consumption by use of heaters by both commercial and residential members. LCEC has a 24-hour manned dispatch center where the loads are monitored. If loads increase on a particular line or substation our dispatchers can direct switching to minimize the impacts of the higher power demands. In addition, disconnects to members are discontinued during extreme cold weather.
  - System Operations maintains a list of peak loads for all our LCEC substations and transmission facilities. If loads increase on a particular line or substation our dispatchers can direct switching to minimize the impacts of the higher power demands.
  - LCEC will hold both pre-weather and post-weather emergency meetings when extreme hot weather is expected to impact the LCEC service territory to identify opportunities for improvement.
- Load Shedding
  - If load shedding is required and direction is provided from ████████ ████████████████████████ to LCEC then the LCEC Manager of Engineering and Operations or his designee will instruct the System Operators as to which circuits from which to shed the load.
  - If load shedding was required by ███████ and after ███████ has directed LCEC to restore power, then the LCEC Manager of Engineering and Operations or his designee will instruct the System Operators as to which circuits to restore.
  - LCEC maintains a list of critical load customers that are directly served by LCEC in our System Operations (Article A). LCEC will make efforts to not interrupt power to these members on the approved list during load shedding operations; however, LCEC does not guarantee uninterruptible power to any member including members on the approved critical load customers list.

9) Wildfire

- LCEC's established wildfire response strategies and its plans to mitigate the hazards of wildfire to its facilities are documented in the Wildfire Mitigation Plan (Article B).

LCEC makes efforts to minimize hazards of wildfire to its facilities that include portable water tanks to spray water on poles that are in the path of the fire, removal of debris from poles and crossarms. Dispatching of supervisors and crews to fires to survey and prevent damage, and report fire to both internal and external personnel and agencies.

- LCEC does not serve load in an area affected by hurricanes, therefore that requirement of 25.53(e)(1)(F) does not apply and is not addressed in this EOP.

10) Annexes:

- Contact property and casualty insurer
- External communications – maintain consistency through approved corporate statement
- Contact business partners for spare equipment and assistance recovering essential data (see Information Systems and Paper Records section)
- Use the media to inform the members of the temporary location, if necessary
- Implement IVR phone system messaging as required
- Use realtors as a resource to identify property that can be used as a temporary site or a new permanent site, if needed
- Lease temporary office trailers
- Set up various employees to work from home, if necessary. Have a detailed plan in place that identifies what can be done at home and how it can be done
- Consider asking for partial property use of neighboring Cooperatives, IOUs, municipals, businesses and/or schools
- Obtain essential office furniture and equipment from local and/or regional suppliers
- Provide security on site (employees, vendor, fence, guards). Local law enforcement or contracted security services
- Establish clean-up crew for site using employees or contractors
  - Pandemic and epidemic

11) PANDEMIC PREPAREDNESS PLAN

Purpose

While it is not possible to predict when or if a pandemic situation will occur, or how long it will last should it occur, this document addresses a general overview of the plan for such an incident. Pandemic planning by nature emphasizes health aspects in continuity planning, but the overall purpose of the plan is to maintain business activities and operations.

Scope

The Pandemic Preparedness Plan covers aspects of business continuity in the event of a pandemic situation. Other events that have the potential to disrupt business activities and

operations are covered in additional documents including, but not limited to, the Emergency Preparedness Plan/ the Business Continuity Plan.

Responsibilities
The Pandemic Response Team is responsible for oversight, implementation, and maintenance of this document. Should it be necessary to implement this plan, this team will work together with department managers to ensure that minimal business interruptions occur.

Pandemic Response Team members include:
- GM, Manager of Administrative Services/Compliance/Safety/Facilities, Manager of Communications/IT Services, Manager of Marketing/Member Services, Director of Line/System Operations, Manager of Accounting/Customer Service, Director of Distribution and System Planning.

PLAN PHASES

The plan consists of the following phases:
- Preparedness and Communication
- Surveillance and Detection
- Response and Containment
- Recovery and Documentation

The plan relies heavily on Federal, State, and Local health and government officials and the orders issued by those officials to determine which phase we are in and what specific actions to take. The below actions are guidelines but subject to change based on the recommendations of these federal, state, and local health and government officials and the needs of the Cooperative to maintain its business continuity or other concerns.

	Transmissibility and Risk to Humans	Pandemic Plan Activities
Phase 1	Risk to humans is low	• Employees are educated to ensure pandemic awareness. • Coordinate planning with critical infrastructure providers • Test the pandemic plan to assess readiness and strengthen as needed.
Phase 2	Risk to humans is moderate and building	• Educate key suppliers • Continue all phase 1 activities • Initiate communication plan with all members

		• Commence social distancing/remote access, telework and outposts as necessary • Develop payment plan communications to highlight the features of on-line payment, pre-payment and drop box, if applicable • Initiate specific PPE training sessions • Implement supply stockpile strategy • Increase situational awareness
Phase 3	Risk to humans is prevalent	• Communicate phase change with members • Continue all phase 2 activities • Raise level of pandemic awareness
Phase 4	Isolated clusters of less than or equal to 10 people and lasting less than or equal to 2 weeks. Risk to humans is substantial	• Communicate phase change with members • Continue all phase 3 activities • Ensure that all staff know what to do to prevent personal and family infection • Implement pandemic web site/alerts • Implement travel restrictions and quarantine if applicable • Implement close surveillance of pandemic
Phase 5	Smaller clusters of less than or equal to 5 people and lasting greater than 2 weeks. Risk to humans is extreme.	• Communicate phase change with members • Continue all phase 4 activities • Continuous situational surveillance of pandemic
Phase 6	Avoid personal contact. Risk to humans at maximum.	• Minimize impact of Pandemic • Continue all phase 5 activities • Implement full personal protective and containment measure if applicable • Assess sufficiency of plan measures daily and adjust as needed

Preparedness and Communication

LCEC will implement the following in their efforts to be prepared for a potential pandemic event and its related communication contingencies.
- Chain of command communication for getting instructions to all staff
- Each department should refer to their own business continuity/emergency preparedness plan if appropriate.
- Department Managers maintain a current roster of their employees with their contact information. They will notify their employees should there be a situation that would impact the performance of their normal job duties and provide them with necessary instructions.
- Manager of Administrative Services will maintain a centralized roster.
- Key employees may be authorized and approved to have remote access, allowing them to maintain daily operations without physically being onsite. They are to check their email, text, and voicemail regularly to ensure that important messages are retrieved, and business is conducted in a timely and appropriate manner.
- Employees working remotely will work with the IT Department to identify and correct any potential connectivity issues in advance.
  - LCEC will create a culture of infection control in the workplace. Information about recommended practices to reduce the spread of infection is documented in LCEC's Pandemic Preparedness Plan. Distribution of adequate infection control supplies including hand sanitizers, tissues, and disinfecting wipes.
  - Instructions on proper procedures for cleaning high-touch surfaces including keyboards, telephones, doorknobs, etc.
- LCEC encourages employees and their families to get annual vaccinations if availab

Surveillance and Detection
Pandemic Response Team will:
- Monitor staffing levels (including contractor/mutual aid levels) to ensure that available resources do not fall below critical levels.
- Each department should refer to their own business continuity/emergency preparedness plan.
- Monitor local health advisories to determine when the optimal time approaches to begin shifting key staff to working remotely to reduce contact with possible infected staff.
- Determine when it becomes appropriate to reduce the availability of services at a specific location, such as front desk operations, collections contact, field personnel contact with the public.
- Determine when it becomes appropriate to close specific offices
- Educate all employees as to pandemic symptoms and become proactive at directing infected staff to medical facilities for treatment at the employee's own expense/insurance.

- Any employer directed time off due to symptoms may require the employee to utilize available PTO. If PTO time is unavailable, the missed hours will be unpaid unless deemed otherwise by the General Manager.

Response and Containment

Should a potential pandemic outbreak occur, LCEC will:
- Communicate initial notification to all employees
- Activate communications through chain of command to inform staff of company guidelines and keep all employees updated on the situation
- Communicate periodic updates using mobile communications
- Each department should refer to their own business continuity/disaster recovery plan if appropriate.
- Have key staff begin working remotely to minimize contact with others, including the rerouting of phone extensions to ensure all incoming calls and messages are received in a timely manner
- Communicate any changes in services (front desk, appointment only, closure) to the customers by posting lobby and door signs and posting a notice on the website home page, as directed by Communications
- Have signage posted at all entrances to the facility advising staff and visitors not to enter if they have influenza/coronavirus symptoms
- Department managers will advise employees not to come to work when they are feeling ill, particularly if they are exhibiting any symptoms and to consult a health care provider, if necessary, at employee's own expense.
  - Any employer directed time off due to symptoms will require the employee to utilize available PTO. If PTO is unavailable the missed hours will be unpaid unless deemed otherwise by the General Manager.
- Advise staff members that have been told to stay home to stay in contact with management through regular telephone and email.

Recovery and Documentation

Once the pandemic situation subsides and the staff is healthy enough to report back to work at normal (pre-pandemic) levels:
- LCEC may resume its usual day-to-day business operations at all locations.
- Remote staff will be instructed to return to their normal workstations and job responsibilities.
- Communication through chain of command will be placed in standby status Communication will be updated to reflect "business as usual" status

Follow-up documentation will be maintained as part of LCEC's disaster recovery records, making note of significant lessons learned, actions taken, and recommended changes in procedures for future pandemic situations. In addition, the Pandemic Response Team will

document all ongoing and routine testing and preparedness planning efforts to ensure the cooperative is able to respond quickly and efficiently in the event of a pandemic disaster.

Actions Taken if an employee has symptoms or tests positive for the pandemic disease or virus:
The Cooperative will rely on Federal, State, and Local Health and Government Official guidelines to determine the course of action to take if an employee of the Cooperative has symptoms of and/or tests positive for the pandemic disease or virus but reserves the right to deviate from those guidelines based on the needs of the Cooperative to sustain its business continuity or other concerns.

Actions Taken if an employee has symptoms of or tests positive for the pandemic disease or virus that has been in contact with employees while at work location.:
If an employee tests positive for the pandemic disease or virus, the Cooperative will require any employee that may have been exposed to the virus to self-quarantine. The Cooperative will thoroughly disinfect anything that may be carrying the virus.

12) Cyber Security Incidents
- The following items are strongly dependent on information and communications technologies for the normal operation of the cooperative during emergency conditions:

Risk Mitigation Efforts

- Crews are equipped with cell phones

- Vendor list is maintained and stored offsite and, on the network,
- Critical information is backed up and/or duplicated and stored offsite and on the network
- LCEC has a Backup Continuity Recovery Service (BCRS) contract with IT business partner, for software packages
    - LCEC notifies business partner of an Outage Emergency
        - Host client data available within 24 hours of data receipt
        - Host access for 24-hours a day, 7 days a week, for 7 business days

Backup/Restore Schedule and Methodology

LCEC's first level of backup/restore is done via ██████████ ██. Retention is dependent on the server and folder and ranges from 10 to 60 days.

VMWare Environment

LCEC currently utilizes ████████████████ solution.

LCEC's server back██████████████ is based on three priority levels. These levels are described below and are based on the frequency of change in the data that occurs on a given server.

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LCEC's server back██████████████████████ levels. The levels are described below.

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Workstations/PC

Backups are not performed on these systems. User profile ████████████████
███████████████████

Switches/Routers

LCEC utilizes a Network Configuration Manager (NCM) ██████████████████████ ██████████████████

Short-Term Recovery Efforts

Short-term actions to consider following an emergency involving loss of network hardware, data or communications include:
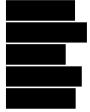
- Assess/address coverage issues and safety issues of using alternate radio or phone systems
- Forward to Call Center, another cooperative, business, employees' homes
- Use mobile phones and obtain more as needed
- Contact Phone Company – switch number routing, as needed
- Use land lines if possible (field personnel call from member phone or pay phone)
- Use company radio
- Move virtual servers by priority to alternate host located at ████████████████ ████████████████████
- See Vendor List and contact applicable vendors to acquire essential equipment
- Restore from backup all impacted software and data
- Contact business partner for Backup Continuity Recovery Services
- If necessary, assign eligible employees to work from home using virtual private network software

Long-Term Recovery Efforts

Long-term actions to consider following an emergency involving loss of network hardware, data, or communications:

- Address FCC requirements.
- Document/assess vendor response time and capabilities to improve understanding of future needs.

Potential Physical Security Incidents

13) Drills
   a) A drill shall be conducted annually to test this EOP if the EOP is not implemented in response to an incident within the last 12 months. (Records of all drills conducted are maintained)
   b) This EOP will be revised as needed after each drill.
   c) At least 30 days prior to at least one drill each year, LCEC will notify commission staff by email or other written form, of the date, time, and location of the drill.

14) Emergency Operation Plan Activation History

This section sets forth each incident in the prior calendar year that required LCEC to activate its EOP and a summary of the circumstances that required activation. This information along with a summary after-action report, including lessons learned and an outline of changes made to the EOP as a result, if any, will be filed with the annual EOP submittal to the Public Utility Commission of Texas.

AFFIDAVIT OF BOBBY FERRIS

(Affidavit of Entity's Highest-Ranking Official)

Bobby Ferris, of lawful age, being duly sworn upon oath states as follows:

1. I am the Executive Vice-President and General Manager of Lea County Electric Cooperative ("LCEC"). I have served in this position since 2017.

2. LCEC was formed in 1949, by its members as an electric cooperative under New Mexico law. LCEC provides power to members in ███████████████████████████████ ████████████████████████████

3. Relevant operating personnel are familiar with and have received training on the contents of this EOP, and such personnel are committed to following the EOP except to the extent deviations are appropriate because of specific circumstances during the course of an emergency.

4. This EOP has been reviewed and approved by the appropriate executives.

5. Required emergency activation drills will be conducted.

6. This EOP or an appropriate summary has been distributed as needed.

7. LCEC maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

8. LCEC's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will receive National Incident Management System training, specifically IS-700.a, IS-800.b, IS-100.b, and IS-200.b.

_____

Bobby Ferris

Executive Vice-President and General Manager

Lea County Electric Cooperative

Subscribed and sworn to before me this _____ day of April, 2022.

_____

Notary Public

My commission expires:

Commission No.: