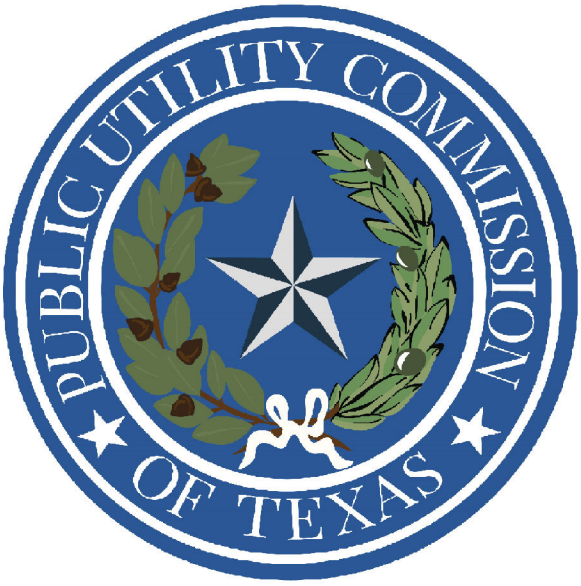


Filing Receipt

Received - 2022-05-26 12:11:34 PM
Control Number - 53385
ItemNumber - 588

May 26, 2022

VIA ONLINE SUBMISSION

Filing Clerk
Public Utility Commission of Texas
1701 North Congress Avenue
Austin, Texas 78701

Re: Project No. 53385, *Project to Submit Emergency Operations Plans and Related Documents Under 16 TAC § 25.53*

Dear Filing Clerk,

Please accept for filing in the above-referenced proceeding an updated emergency operations plan for Snyder ESS Assets, LLC ("Snyder"). Snyder is a power generation company that was acquired by GSF Americas Inc. ("GSF") on April 26, 2022. As soon as GSF acquired Snyder, it began working diligently to submit an EOP to comply with 16 Texas Administrative Code ("TAC") § 25.53. Snyder respectfully requests a good cause exception to the April 18, 2022 filing deadline given the recent transaction.

_/s/ John-Michael Cheshire_____
John-Michael Cheshire
Director
GSF Americas Inc.

PROJECT NO. 53385

PROJECT TO SUBMIT	§	**PUBLIC UTILITY COMMISSION**
EMERGENCY OPERATIONS PLANS	§	
AND RELATED DOCUMENTS	§	
UNDER 16 TAC § 25.53	§	**OF TEXAS**

SNYDER ESS ASSETS, LLC'S EMERGENCY OPERATIONS PLAN
EXECUTIVE SUMMARY

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, Snyder ESS Assets, LLC ("Snyder") files this executive summary of its emergency operations plan ("EOP"). This executive summary describes the contents and policies contained in the EOP, includes references to specific sections and page numbers of the EOP that correspond with the requirements of 16 TAC § 25.53, and includes a record of distribution. This filing also includes a redacted copy of the EOP and the required affidavit. Snyder is a registered power generation company and a wholly owned subsidiary of GSF Americas Inc. The Snyder facility is a battery energy storage system ("BESS").

A. Contents and Policies (16 TAC § 25.53(c)(1)(A)(i)(I))

Attachment A to this Executive Summary is a redacted copy of Snyder's EOP. The purpose of the EOP is to provide general guidelines for identifying and responding to emergency events at the Snyder BESS site.

The EOP contains the following sections:

Description	EOP Reference
Purpose	Section 1, page 1
Scope & Training	Section 2, page 1
Roles & Responsibilities	Section 3, page 1
Approval & Implementation	Section 4, page 2
Reporting Requirements	Section 5, page 2
Drills	Section 6, page 3
Emergency Response	Section 7, page 3
Site Specific Information	Section 7.1, page 3
Severe Weather	Section 7.2, page 3
Fire Emergencies	Section 7.3, page 4
Critical Failure Points	Section 7.4, page 4
Emergency Shortage of Water	Section 7.5, page 5

Description	EOP Reference
Emergency Supply Inventory	Section 7.6, page 5
Other Emergency Events	Section 7.7, page 5
Fuel and Storage Capacity	Section 7.8, page 5
Generation Capacity Recovery	Section 7.9, page 5
Pandemic Preparedness	Section 7.10, page 5
Cybersecurity	Section 7.11, page 6
Physical Security	Section 7.12, page 6
Staffing During Emergency Response	Section 7.13, page 6
Communications	Section 8, page 6
24/7 Remote Operations Monitoring	Section 8.1, page 6
External Communications	Section 8.2, page 6
Site Emergency Contact Information	Section 8.3, page 7; Appendix C, page 10
Facility Description	Appendix A, page 8
Site Map	Appendix B, page 9
Record of Distribution	Appendix D, page 12

B. Record of Distribution (16 TAC §§ 25.53(c)(1)(A)(i)(III) and 25.53(c)(4)(A))

The record of distribution is provided for in Appendix D of the EOP.

C. Affidavit (16 TAC §§ 25.53(c)(1)(A)(i)(IV) and 25.53(c)(4)(C))

Attachment B to this Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

D. Emergency Contact List (16 TAC § 25.53(c)(4)(B))

Appendix C contains the EOP's emergency contact information required by 16 TAC § 25.53(c)(4)(B).

The primary and backup emergency contacts who can immediately address urgent requests and questions from the Commission during an emergency are identified in Section 8.2.3, page 7. Their names and contact information will be provided in the confidential filing.

E. Common Operational Functions Relevant Across Emergency Types (16 TAC § 25.53(d))

The EOP addresses common operational functions relevant across emergency types, including:

Description	EOP Reference
Scope & Training	Section 2, page 1
Roles & Responsibilities	Section 3, page 1
Critical Failure Points	Section 7.4, page 4
Emergency Supply Inventory	Section 7.6, page 5
Generation Capacity Recovery	Section 7.9, page 5
Staffing during Emergency Response	Section 7.13, page 6
Communications	Section 8, page 6
Emergency Response Contact Information Sheet	Appendix C, page 10

F. Approval and Implementation (16 TAC § 25.53(d)(1))

Description	EOP Reference	Rule Reference
Introduction of EOP and outline of its applicability	Sections 1-4, pages 1-2	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the EOP, and those who can change the EOP	Section 4, page 2	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change made to the EOP since the initial EOP filing requirement	Section 4.2, page 2	16 TAC § 25.53(d)(1)(C)
Dated statement that the current EOP supersedes previous EOPs	Section 4.3, page 2	16 TAC § 25.53(d)(1)(D)
Date the EOP was most recently approved	Approved Date in header	16 TAC § 25.53(d)(1)(E)

G. Communication Plan (16 TAC § 25.53(d)(2)(B))

Snyder's communication plan is provided in Section 8, page 6 of the EOP. Section 8.2.1 describes the procedures during an emergency for communicating with the media; the Public

Utility Commission of Texas; the Office of Public Utility Counsel; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator. Because the BESS does not consume fuels, the procedure to communicate with fuel suppliers is not applicable.

H. Emergency Supply Plan (16 TAC § 25.53(d)(3))

Section 7.6, page 5 describes emergency supply inventory for emergency response.

I. Emergency Staffing Plan (§ 25.53(d)(4))

Section 7.13, page 6 describes staffing during emergency response.

J. Weather Related Hazards (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))

Section 7.2, pages 3-4 include Snyder's plans for identifying, monitoring, and responding to weather events as outlined below:

Description	EOP Reference	Rule Reference
Identification of Weather-Related Hazards	Section 7.2.2, page 3	16 TAC § 25.53(d)(5)
Extreme Cold, including • operational plans for responding to a cold weather emergency distinct from the weather preparations required under 16 TAC § 25.55 and • checklist for generation resource personnel to use during a cold weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency	Section 7.2.6, page 4	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)
Extreme Heat, including • operational plans for responding to a hot	Section 7.2.7, page 4	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)

Description	EOP Reference	Rule Reference
weather emergency distinct from the weather preparations required under 16 TAC § 25.55 • checklist for generation resource personnel to use during a hot weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency		

As stated in Section 7.8.1, page 5, the BESS does not consume fuels and there is no fuel switching equipment installed. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply.

K. Water Shortage (16 TAC § 25.53(e)(2)(B))

As stated in Section 7.5 page 5, the BESS site does not rely on water to generate electricity. Therefore, 16 TAC § 25.53(e)(2)(B) requiring a water shortage annex does not apply to Snyder.

L. Restoration of Service (16 TAC § 25.53(e)(2)(C))

Section 7.9, page 5 describes the plans for generation capacity recovery.

M. Pandemic and Epidemic (16 TAC § 25.53(e)(2)(D))

Section 7.10, page 5 addresses Snyder's pandemic and epidemic emergency response plan.

N. Hurricane (16 TAC §§ 16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(E))

As stated in Section 7.2.4, page 3, the Snyder BESS site is not located in a hurricane evacuation zone. Therefore, 16 TAC § 25.53(d)(5) requiring a plan that addresses how an entity identifies hurricanes and 16 TAC § 25.53(e)(2)(E) requiring a hurricane annex does not apply to Snyder.

O. Cyber Security (16 TAC § 25.53(e)(2)(F))

Section 7.11, page 6 contains Synder's cybersecurity annex.

P. Physical Security Incident (16 TAC § 25.53(e)(2)(G))

Section 7.12, page 6 contains Snyder's physical security annex.

Q. Additional Annexes (16 TAC § 25.53(e)(2)(H))

The following table shows the additional annexes that are appropriate for Synder's BESS site:

Description	EOP Reference
Equipment Weatherization	Section 7.2.5, page 3
Fire Emergencies	Section 7.3, page 4
Critical Failure Points	Section 7.4, page 4
24/7 Remote Operations Monitoring	Section 8.1, page 6
Site Emergency Contact Information	Section 8.3, page 7; Appendix C, page 10
Facility Description	Appendix A, page 8
Site Map	Appendix B, page 9

R. Drills (16 TAC § 25.53(f))

GSF Americas/LG Energy Solutions plans to conduct a drill on the EOP by the end of 2022. Upon completion of the drill, Snyder will file a supplement in this docket providing the date, time, and location of the drill.

May 26, 2022

Respectfully Submitted,

/s/John-Michael Cheshire
John-Michael Cheshire
Director
GSF Americas Inc.

ATTACHMENT A

1. Purpose

The purpose of this Emergency Operations Plan ("EOP") is to act as a guideline in the event of an emergency at GSF Americas Inc.'s ("GSF Americas") Snyder ESS Assets, LLC ("Snyder ESS") battery energy storage system ("BESS") site.

2. Scope & Training

This EOP serves as guidance for all personnel who provide services to GSF Americas in the event of an emergency at the Snyder ESS BESS site. Training on the emergency actions contained in this EOP will be provided to all necessary personnel, and all visitors will receive a site safety orientation that includes relevant elements of this EOP. In addition, certain LG Energy Solutions personnel, who are designated to interact with local, state, and federal emergency management officials during emergency events, will be trained on the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

3. Roles & Responsibilities

3.1. Site Supervisor or Designee
The Site Supervisor or Designee is responsible for maintaining, implementing, and enforcing the EOP. The Site Supervisor or Designee is also responsible for training on the EOP, incident reporting, and serving as the first responder liaison.

3.2. Operations & Maintenance Manager ("O&M Manager")
The O&M Manager is responsible for technical content of the EOP and regulatory compliance.

3.3. Contractors and Visitors
This site is unmanned, so there will typically be no personnel present on site; however, all contractors and other site visitors will receive emergency preparedness training based on this EOP as appropriate for the level of their roles. All visitors to the site are expected to wear personal protective equipment, including safety shoes, safety glasses, and flame resistant clothing. In addition, vendor contracts require a safety kit be maintained by any personnel that will be performing work on the site.

3.4. Remote Management
Sites are entirely controlled via remote management, so in the event of an after-hours emergency, the Site Supervisor should be contacted. The Site Supervisor will contact the necessary first responders or emergency personnel.

4. Approval & Implementation

4.1. EOP-Specific Responsibilities

The EOP shall be reviewed at least annually by GSF Americas. The O&M Manager may change or update the EOP, upon approval by a Director of GSF Americas. Approved revisions to the EOP shall be documented in the Revision Control Summary below. The Site Supervisor or Designee is responsible for distributing the EOP and any approved revisions of the EOP to all necessary personnel.

4.2. Revision Control Summary

Revision No.	Date	Nature of Change	Author	Title
1	May 2022	Initial Draft	[redacted]	[redacted]

4.3. Current Plan

This EOP is approved and effective as of the date in the header and supersedes all prior versions of the EOP.

4.4. Copies of EOP

GSF Americas will keep a copy of this EOP at its headquarters, at each BESS site, and with LG Energy Solutions. An unredacted copy of the EOP will be submitted to the Electric Reliability Council of Texas ("ERCOT") and will be available upon request by the Commission or Commission Staff.

5. Reporting Requirements

5.1.

GSF Americas will continuously maintain this EOP.

5.2.

If GSF Americas makes a change to its EOP that materially affects how it would respond to an emergency, it will file an updated EOP with the Public Utility Commission of Texas ("Commission") no later than March 15 of the following year, as well as the other documentation required by 16 Texas Administrative Code ("TAC") § 25.53(c)(3)(A).

If GSF Americas does not make a change to its EOP that materially affects how it would respond to an emergency, it will file with the Commission an attestation of no changes

no later than March 15 of the following year, as well as the other documentation required by 16 TAC § 25.53(c)(3)(B).

6. Drills

GSF Americas/LG Energy Solutions will conduct emergency drills for each site at least annually to test its emergency procedures. GSF Americas/LG Energy Solutions will assess the effectiveness of each drill and modify this EOP as needed. At least 30 days prior to the date of at least one drill each calendar year, GSF Americas will notify Commission Staff using the method and form prescribed by Commission Staff on the Commission's website and the appropriate Texas Division of Emergency Management District Coordinators by email or other written form of the date, time, and location of the drill. In the event GSF Americas activates its EOP in response to an emergency, it is not required to conduct a drill in the calendar year in which the EOP was activated.

7. Emergency Response

7.1. Site Specific Information
Appendix A: Facility Description
Appendix B: Site Map
Appendix C: Site Emergency Contact Information
Appendix D: Record of Distribution

7.2. Severe Weather

7.2.1. The site is unmanned during normal operations with 24/7 remote operations monitoring by the Site Supervisor and LG Energy Solutions. See Appendix C for Site Emergency Contact Information.

7.2.2. The facilities were designed to provide power to the grid during times of extreme stress. For that reason, the facilities have a sophisticated system of load predictive software that includes inputs from a weather service. Any time there is a severe weather event—including, but not limited to, tornadoes, hurricanes, severely cold weather, severely hot weather, drought, and flooding— LG Energy Solutions personnel will be alerted by the software system and notified of the event type and severity.

7.2.3. The Site Supervisor or Designee shall notify all potentially impacted contractors and visitors of severe weather conditions. Any personnel on site will be advised to stop work and exit the area if safely possible.

7.2.4. The facility is outside of the 500-year flood plain and hurricane evacuation zone.

7.2.5. The BESS equipment is designed to operate in temperatures between -13 and 45 degrees Celsius and is enclosed in weatherproof, standardized shipping containers. They have been fitted with fire suppression, lighting, communications, and HVAC. The systems have heating and cooling functionality that are capable of conditioning the containers across all American Society of Heating, Refrigerating and Air-

Conditioning Engineers (ASHRAE) Climate Zone 3 design conditions, both under full equipment load and without any equipment load. Each container has 2 HVAC units, one on each end, which eliminates the possibility of a single failure causing containers to overheat or freeze. The containers are also insulated to reduce the likelihood of temperature failure. Best efforts should be made to ensure the BESS equipment operates as designed, particularly in advance of the winter peak and summer peak load seasons.

7.2.6. In the event that temperatures exceed design conditions in severely cold weather, personnel shall use the following checklist:

- The operators will receive an early warning from the remote temperature sensors.
- If the temperature in the units continues to fall and a critical temperature is reached, the BESS will shutdown and enter "safe" mode.
- Operators will then monitor the units until operational temperatures are once again achieved.
- The system will then be returned to normal operation.

This checklist may be revised based on lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

7.2.7. In the event that temperatures exceed design conditions in severely hot weather, personnel shall use the following checklist:

- The operators will receive an early warning from the remote temperature sensors.
- If the temperature in the units continues to climb and a critical temperature is reached, the BESS will shutdown and enter "safe" mode.
- Operators will then monitor the units until operational temperatures are once again achieved.
- The system will then be returned to normal operation.

This checklist may be revised based on lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

7.3. Fire Emergencies

Anyone who observes or receives information regarding a fire emergency situation shall immediately notify the Site Supervisor. The Site Supervisor will call 911 and instruct any personnel present to evacuate the area.

7.4. Critical Failure Points

7.4.1. The facilities were designed to eliminate critical failure points, utilizing redundant and backup components to the largest extent possible. The network system has

three service paths: VSAT, Fiber, and LTE. The inverters utilize 10 inverters, each handling 1 MW of capacity.

7.4.2. The fire suppression system has the ability to sense and purge any off-gassing from the modules, while also utilizing a single module squelch system to douse any module that passes a temperature threshold.

7.5. Emergency Shortage of Water

The facilities do not utilize water for any of the site operations, and there is no water service at the facility.

7.6. Emergency Supply Inventory

At all times, the following safety equipment will be kept on site: first aid kit, one fire extinguisher per container, and emergency snake bite kit.

7.7. Other Emergency Events

Remote facility managers will address severe weather events and other emergencies by notifying the Site Supervisor and appropriate local emergency service.

7.8. Fuel and Storage Capacity

7.8.1. The facility does not consume fuels and no fuels are stored on-site. Therefore, there is no fuel switching equipment installed.

7.8.2. The BESS allows for 10 MW of load to be discharged continuously for 2 hours at peak capacity.

7.9. Generation Capacity Recovery

7.9.1. During an outage, the first priority for safe operations is to recover the control system for the facility. This will give visibility into container environment and various system status. Once the operators can see the controls system, they will bring back the inverters and check health.

7.9.2. The next priority will be to bring the modules back and resume normal facility operation.

7.10. Pandemic Preparedness

The BESS site is remotely operated with no full-time on-site employees. Remote personnel will ensure that third-party site operations, maintenance staff, and contractors are properly staffed to avoid pandemic-related issues or delays in maintenance activities.

7.11. Cybersecurity

7.11.1. Cybersecurity testing is an integral part of the BESS lifecycle. Systems should be secure by design and through operations by continuous monitoring, risk assessments, and patching as necessary.

7.11.2. A process should be created and put in place to ensure continuous hardening of the BESS. The principle of hardening is to ensure that the attack surface to the site and equipment is limited by:

- Keeping only necessary network service ports open; others should be closed.
- Installing only necessary software on devices; other software should be removed.
- Development environments and source code should not be installed on production devices.
- Remote access protocols that use plain text communication should not be used.
- Software that stores passwords unencrypted should not be used.

7.12. Physical Security

The facilities are secured using locked gates. Only company personnel and trusted contractors are given access to the facilities. There are also security cameras that monitor the sites 24/7.

7.13. Staffing during Emergency Response

The BESS site is remotely operated with no full-time on-site employees. In the event of an emergency, LG Energy Solutions will ensure that the BESS site is appropriately staffed to avoid or mitigate emergency-related issues.

8. Communications

8.1. 24/7 Remote Operations Monitoring

The site is unmanned during normal operations with 24/7 remote operations monitoring by the Site Supervisor and GSF Americas. LG Energy Solutions serves as the point of contact for all GSF Americas BESS site emergencies, including those that occur outside of normal operating hours.

8.2. External Communications

8.2.1. In the event of an emergency, LG Energy Solutions will be responsible for all external communications with individuals, agencies, and/or entities, including with the media; the Commission; the Office of Public Utility Counsel; local and state governmental entities, officials, and emergency operations centers as appropriate in the circumstances for GSF Americas; and ERCOT. All employees of affiliate companies of GSF Americas, other than appointed Directors, shall refrain from communicating with the media. Such communications will follow internal approval processes as defined by the fund manager of the Gore Street Energy Storage Fund Plc.

8.2.2. Because the BESS does not consume fuels, the procedure to communicate with fuel suppliers is not applicable to GSF Americas.

8.2.3. The following individuals are authorized to address urgent requests and questions from the Commission during an emergency:

Primary Contact:	Backup Contact:
[redacted]	[redacted]

8.3. Site Emergency Contact Information

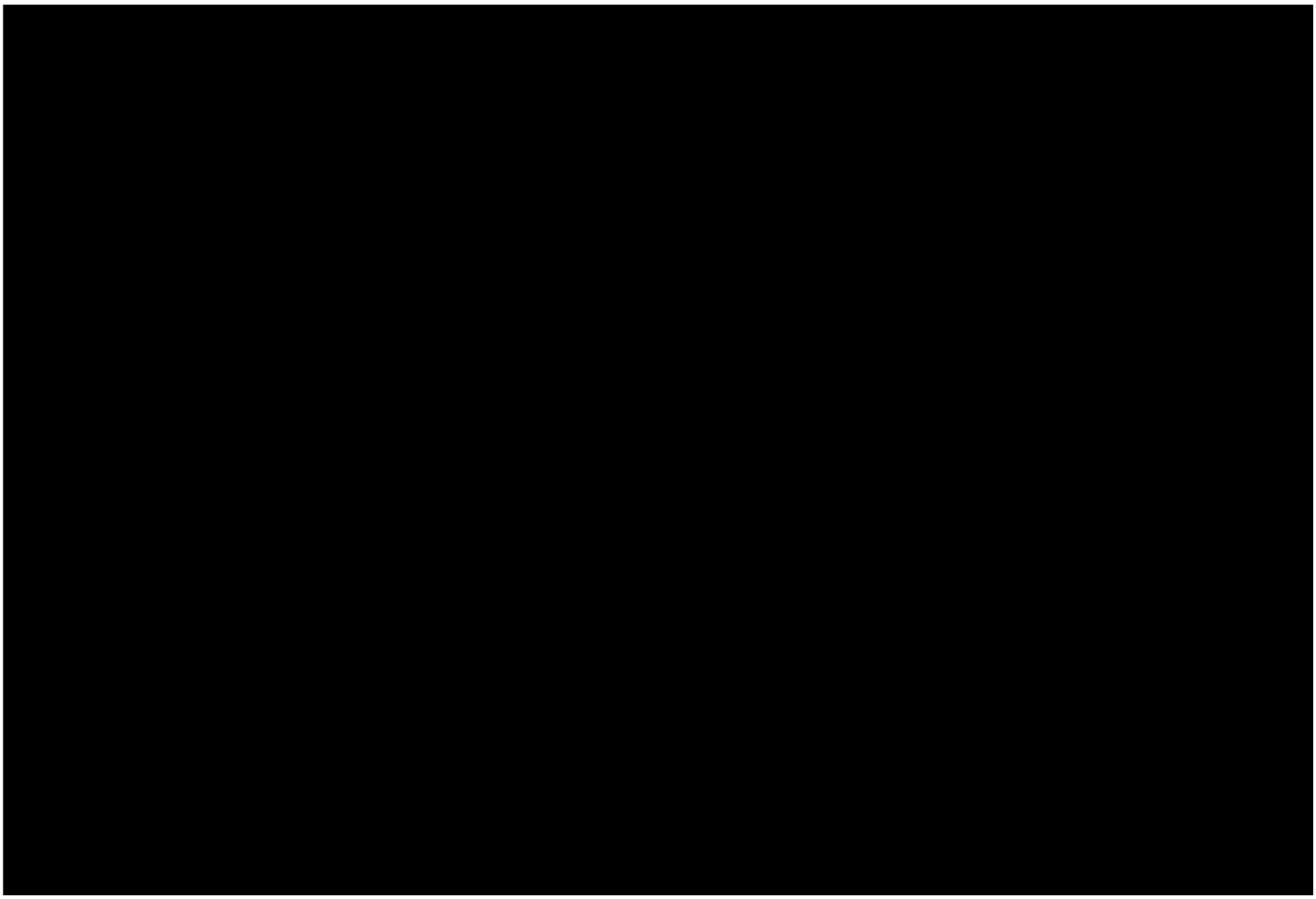
For the Site Emergency Contact Information, refer to Appendix C. This contact information will be posted on site and will be provided to LG Energy Solutions. The Primary Remote Monitoring Contact's phone number is included in Appendix C.

APPENDIX A: Facility Description

Snyder ESS is a 9.95 MW BESS facility located at [redacted].
The facility is interconnected to the distribution system of Oncor Electric Delivery Company.

Snyder ESS is wholly owned by GSF Americas Inc.

APPENDIX B: Site Map



APPENDIX C: Site Emergency Contact Information

Site Address and Contacts:

Site Address	[redacted]
Site Supervisor	[redacted]
O&M Manager	[redacted]
Primary Remote Monitoring Contact	[redacted]
Contact for GSF Americas	[redacted]
Contact for QSE	[redacted]

Emergency Responder Numbers:

Scurry County Sheriff (non-emergency)	(325) 573-3551
General Emergency	911
Fire/Ambulance	911
Emergency Services (Fire & Rescue) Local Number	(325) 573-6213
Fire Chief / EMC, Perry Westmoreland	(325) 573-6215
Perry Westmoreland, Emergency Management Coord.	(325) 573-6215
City of Snyder, Office of Emergency Management	(325) 573-3546
Hospital Emergency Room Cogdell Memorial Hospital	(325) 573-6374

Regulatory Agency Numbers:

TCEQ Emergency Release Hotline	(800) 832-8224
National Response Center (only if spill leaves the property)	(800) 424-8802
TCEQ Region 3	(325) 698-9674
OSHA – Lubbock Area Office	(806) 472-7681
Chemtrec (for information on hazardous materials)	(800) 424-9300
OPUC Main Number	(512) 936-7500

PUCT Main Number	(512) 936-7000
PUCT Emergency Contact #1 – [redacted]	
Office	[redacted]
Cell	[redacted]
PUCT Emergency Contact #2 – [redacted]	
Office	[redacted]
Cell	[redacted]
PUCT Emergency Contact #3 – [redacted]	
Office	[redacted]
Cell	[redacted]
ERCOT	Via QSE

Spill Response and Cleanup Contractor:

LG Energy Solutions	(317) 225-3299

APPENDIX D: Record of Distribution

The following individuals have received access to and training on the EOP:

Name	Title, Company	Date of Access	Date of Training
[redacted]	[redacted]	05/24/2022	05/24/2022
[redacted]	[redacted]	05/24/2022	05/24/2022
[redacted]	[redacted]	05/24/2022	05/24/2022
[redacted]	[redacted]	05/24/2022	05/24/2022
[redacted]	[redacted]	05/24/2022	05/24/2022

ATTACHMENT B

AFFIDAVIT

THE STATE OF TEXAS §
§
COUNTY OF HARRIS §

BEFORE ME, the undersigned authority, on this day personally appeared Sumi Arima who swore an oath that the following facts are true:

1. My name is Suminori Arima. I am a Director of GSF Americas Inc. ("GSF Americas") and the highest-ranking officer with binding authority over Snyder ESS Assets, LLC ("Snyder"). I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of Snyder. I have personal knowledge of the matters described herein.

2. Snyder is registered with the Public Utility Commission of Texas as a power generation company and is a wholly owned subsidiary of GSF Americas. The Snyder facility is a battery energy storage system.

3. Snyder prepared an emergency operations plan (the "EOP") in accordance with 16 Texas Administrative Code ("TAC") § 25.53. The EOP was approved on May 24, 2022.

4. All 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.

5. The EOP has been reviewed and approved by the appropriate executives.

6. GSF Americas/LG Energy Solutions plan to conduct a drill in accordance with 16 TAC § 25.53(f) by the end of the year.

7. The EOP or an appropriate summary has been distributed to local jurisdictions as needed.

8. The EOP constitutes a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

9. Certain LG Energy Solutions personnel, who are designated to interact with local, state, and federal emergency management officials during emergency events, will complete the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System ("NIMS") training.

10. Snyder will file a supplement in this docket upon completion of its drill and emergency management personnel NIMS training.

FURTHER AFFIANT SAYETH NOT.

Digitally signed by Suminori Arima
DN: cn=Suminori Arima, o=Gore Street Capital, ou, email=sarima@gorestreetcap.com, c=GB

Suminori Arima
Director
GSF Americas Inc.

Sworn to and subscribed before me this 26th day of May 2022.

Notary Public, State of Texas
My Commission Expires:

CATHERINE SPENCE
Notary ID #4231566
My Commission Expires
May 28, 2024