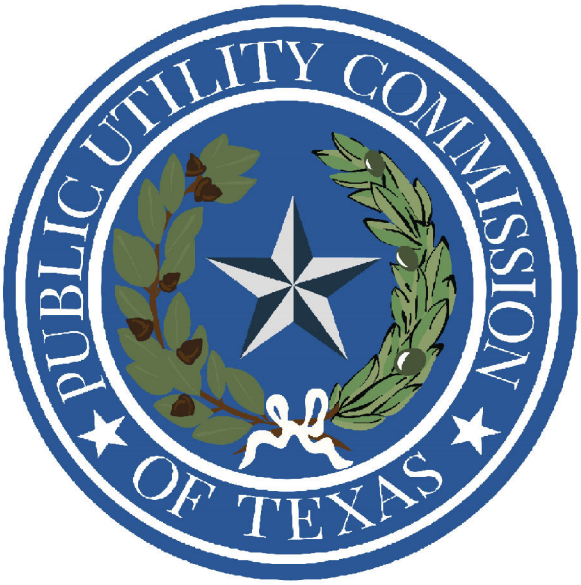

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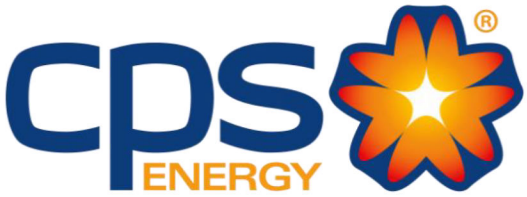

Emergency Operations Plan

Related Documents under Texas Public Utility Commission Title 16, Part 2, Chapter 25, Subchapter C, Rule § 25.53

Plan Owner	William McCarson, Business Continuity Program

Final

6/1/2022

Table of Contents

Annexes

1. Executive Summary

1.1. Contents and Policy

This CPS Energy **Emergency Operations Plan (EOP)** addresses the requirements of Public Utility Commission of Texas (PUCT) *16 TAC Chapter 25, Subchapter C, 25.53 Electric Service Emergency Operations Plans*, as applicable.

CPS Energy is a municipally-owned public utility that owns and operates electric generation, transmission and distribution infrastructure in the greater San Antonio area. CPS Energy serves approximately 880,000 electric customers in eight Texas counties, an electric retail service area covering 1,515 square miles. CPS Energy also owns and operates a natural gas transmission and distribution system that provides fuel gas to its power generation plants, as well as providing natural gas to approximately 366,000 retail customers. There are approximately 3,000 CPS Energy employees, supported by contractors. CPS Energy is governed by an independent Board of Trustees that five Trustees, including the Mayor of San Antonio. The City of San Antonio is CPS Energy's owner and regulator.

The CPS Energy electric infrastructure includes:

- 8,142 miles of overhead distribution electric lines
- 6,274 miles of underground electric lines
- 1,555 miles of transmission lines
- 100+ substations
- 4 power generation stations, with a total of 7,356 MW generation capacity

Note: *CPS Energy is a joint owner of the* ***South Texas Project Electric Generation Station (STPEGS)****. STPEGS manages and utilizes its own EOP to address emergencies for that facility. NRG, as a co-owner of the STPEGS facility, has submitted a copy of the EOPs that STPEGS have developed.*

To comply with the rule submittal requirements, CPS Energy compiled this **EOP** as a vehicle to provide the PUCT with response plan information and to satisfy all requirements. This EOP makes several references to CPS Energy's various emergency response plans. These documents are confidential and have been submitted to ERCOT. Summaries of these plans are attached hereto as Annexes A – M.

Section 3 - List of CPS Response Plans contains a description of the CPS Energy response plans related to the rule. There are generally three types of response plans in the CPS Energy response management system, including:

- **Enterprise response plans** – Applicable to all areas of the entity, including electric transmission/distribution, power generation and natural gas, and may be hazard-specific or multi-hazard.
- **Incident-specific response plans** – Applicable to specific business areas and contain response guidelines for very specific types of hazards.
- **Facility-specific response plans** – Applicable to each facility or work site and may address multiple hazards related to that facility.

The **Enterprise Incident Management Plan** is the highest planning level in the CPS Energy response management system. It is an all-risk, all hazard incident response plan that is also a guide to all other

facility-based or incident-specific plans. The **Enterprise Incident Management Plan** contains media and public affairs procedures for incident management, referred to in the rule as a "communications plan."

The **Enterprise Storm Plan** is particularly relevant to the rule, as it addresses overall response management for a broad electrical outage incident, most commonly caused by severe weather. This Plan contains electric restoration information specifically required by the rule, including weather-related emergency response, outage response management and load shed procedures.

Included in this EOP are summaries of three Plans not specifically identified in the rule, the **Substation & Transmission Emergency Response Plan**, the **Underground Integrated Operations Emergency Response Plan** and the **Fuel Supply Conservation Plan**. These Plans contain field-level emergency response procedures for operational areas to help ensure the safety of personnel, facilitate efficient emergency response management in operational areas and build transportation fuel supply resiliency. They are included in the EOP submittal under the requirement of Rule 25.35(e)(1)(I) - *Any additional annexes as needed or appropriate to the entity's particular circumstances*.

It is important to note that CPS Energy maintains **Business Continuity Recovery Plans (BCRPs)** that provide recovery strategies for potential disruptions to critical business areas. There are currently fifty-five BCRP's in effect addressing over 350 critical processes. These Plans are not required to be submitted, however their existence is affirmed in the EOP Affidavit.

This EOP is maintained by the CPS Energy **Business Continuity Program**. For questions or requests to view unredacted Plans, please contact the following:

William McCarson, MBCP
Business Continuity Program Manager
CPS Energy | 500 McCullough Ave., San Antonio, Texas 78215
wmccarson@cpsenergy.com
Office: 210.353.2260
Mobile: 210.380.2153

1.2. Cross Reference

PUC Rule 25.53	Applicability	EOP Section	Page Number
(a) Application. This section applies to an electric utility, transmission and distribution utility, power generation company (PGC), municipally owned utility, electric cooperative, and retail electric provider (REP), and to the Electric Reliability Council of Texas (ERCOT).	**Yes**		
(b) Definitions.	**Yes**		
(1) Annex -- a section of an emergency operations plan that addresses how an entity plans to respond in an emergency involving a specified type of hazard or threat.	**Yes**		
(2) Drill -- an operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP or a portion of an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.	**Yes**		
(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 ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to the entity.	**Yes**		
(4) Entity -- an electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.	**Yes**		
(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.	**Yes**		
(6) 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.	**Yes**		
(c) Filing requirements.	**Yes**		
(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. Each individual entity is responsible for compliance with the requirements of this section. An entity filing a joint EOP or other joint document under this section on behalf of one or more entities over which it has control is jointly responsible for each entity's compliance with the requirements of this section.	**Yes**	Complete EOP Document	
(A) An entity must file with the commission:	**Yes**	EOP Section 1 – Executive Summary	5
(i) an executive summary that:	**Yes**	EOP Section 1 – Executive Summary	5
(I) describes the contents and policies contained in the EOP;	**Yes**	EOP Section 1.1 – Contents and Policy	5

PUC Rule 25.53	Applicability	EOP Section	Page Number
(II) includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;	**Yes**	EOP Section 1.2 – Cross Reference	7
(III) includes the record of distribution required under paragraph (4)(A) of this subsection; and	**Yes**	EOP Section 1.3 – Record of Distribution	15
(IV) contains the affidavit required under paragraph (4)(C) of this subsection; and	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(ii) a complete copy of the EOP with all confidential portions removed.	**Yes**	EOP Document	
(B) For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.	**Yes**	See ERCOT Submittal	
(C) ERCOT must designate an unredacted EOP submitted by an entity as Protected Information under the ERCOT Protocols.	**No**		
(D) An entity must make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	**Yes**	Complete EOP Document	
(E) An entity may file a joint EOP on behalf of itself and one or more other entities over which it has control provided that:	**No**		
(i) the executive summary required under subparagraph (A)(i) of this paragraph identifies which sections of the joint EOP apply to each entity; and	**No**		
(ii) the joint EOP satisfies the requirements of this section for each entity as if each entity had filed a separate EOP.	**No**		
(F) An entity filing a joint EOP under subparagraph (E) of this paragraph may also jointly file one or more of the documents required under paragraph (4) of this subsection provided that each joint document satisfies the requirements for each entity to which the document applies.	**No**		
(G) An entity that is required to file similar annexes for different facility types under subsection (e) of this section, such as a pandemic annex for both generation facilities and transmission and distribution facilities, may file a single combined annex addressing the requirement for multiple facility types. The combined annex must conspicuously identify the facilities to which it applies.	**Yes**	EOP Annexes A-M	
(2) A person seeking registration as a PGC or certification as a REP must meet the filing requirements under paragraph (1)(A) of this subsection at the time it applies for registration or certification with the commission and must submit the EOP to ERCOT if it will operate in the ERCOT power region, no later than ten days after the commission approves the person's registration or certification.	**No**		
(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:	**Yes**	EOP Section 4.1 – Periodic Review	20
(A) 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:	**Yes**	EOP Section 4.3 – Record of Revisions	20
(i) file with the commission an executive summary that:	**Yes**	EOP Section 4.3 – Record of Revisions	20

PUC Rule 25.53	Applicability	EOP Section	Page Number
(I) describes the changes to the contents or policies contained in the EOP;	**Yes**	EOP Section 4.3 – Record of Revisions	20
(II) includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;	**Yes**	EOP Section 1.2 – Cross Reference	7
(III) includes the record of distribution required under paragraph (4)(A) of this subsection; and	**Yes**	EOP Section 1.3 – Record of Distribution	15
(IV) contains the affidavit required under paragraph (4)(C) of this subsection;	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(ii) file with the commission a complete, revised copy of the EOP with all confidential portions removed; and	**Yes**	EOP Document	
(iii) submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.	**Yes**	See ERCOT Submittal	
(B) 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:	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(i) a pleading that documents any changes to the list of emergency contacts as provided under paragraph (4)(B) of this subsection;	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(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	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(iii) the affidavit described under paragraph (4)(C) of this subsection.	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(C) 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.	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(D) ERCOT must designate any revised unredacted EOP submitted by an entity as Protected Information under the ERCOT Protocols.	**No**		
(E) An entity must make a revised unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.	**Yes**	EOP Section 1.1 – Contents and Policy	5
(F) The requirements for joint and combined filings under paragraph (1) of this subsection apply to revised joint and revised combined filings under this paragraph.	**No**		
(4) In accordance with the deadlines prescribed by paragraphs (1) and (3) of this subsection, an entity must file with the commission the following documents:	**Yes**	EOP Document	
(A) A record of distribution that contains the following information in table format:	**Yes**	EOP Section 1.3 – Record of Distribution	15

PUC Rule 25.53	Applicability	EOP Section	Page Number
(i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and	**Yes**	EOP Section 1.3 – Record of Distribution	15
(ii) dates of access to or training on the EOP, as appropriate;	**Yes**	EOP Section 1.3 – Record of Distribution	15
(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; and	**Yes**	EOP Section 2 – Emergency Contacts	17
(C) An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(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;	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit EOP Section 1.3 – Record of Distribution	16
(ii) the EOP has been reviewed and approved by the appropriate executives;	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(iii) drills have been conducted to the extent required by subsection (f) of this section;	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed;	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(vi) the entity's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(5) Notwithstanding the other requirements of this subsection, ERCOT must maintain its own current EOP in its entirety, consistent with the requirements of this section and available for review by commission staff.	**No**		
(d) Information to be included in the emergency operations plan. 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.	**Yes**	EOP Document	

PUC Rule 25.53	Applicability	EOP Section	Page Number
(1) An approval and implementation section that:	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(A) introduces the EOP and outlines its applicability;	**Yes**	EOP Section 1.1 – Contents and Policy	5
(B) lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(C) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to subsection (c)(1) of this section;	**Yes**	EOP Section 6.4 – Record of Changes	20
(D) provides a dated statement that the current EOP supersedes previous EOPs; and	**Yes**	EOP Section 4.3 – Record of Revisions	20
(E) states the date the EOP was most recently approved by the entity.	**Yes**	EOP Section 4.2 –Plan Review & Approval	20
(2) A communication plan.	**Yes**	Section 5 – Communication Plan	21
(A) An entity with transmission or distribution service operations must describe the procedures during an emergency for handling complaints and for communicating with the public; the media; customers; the commission; the Office of Public Utility Counsel (OPUC); local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; the reliability coordinator for its power region; and critical load customers directly served by the entity.	**Yes**	Section 5 – Communication Plan	21
(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.	**Yes**	Section 5 – Communication Plan	21
(C) A REP must describe the procedures for communicating during an emergency with the public, media, customers, the commission, and OPUC, and the procedures for handling complaints during an emergency.	**No**		
(D) ERCOT must describe the procedures for communicating, in advance of and during an emergency, with the public, the media, the commission, OPUC, governmental entities and officials, the state emergency operations center, and market participants.	**No**		
(3) A plan to maintain pre-identified supplies for emergency response.	**Yes**	Section 6 – Pre-Identified Supplies	22
(4) A plan that addresses staffing during emergency response.	**Yes**	Section 7 – Staffing During Emergency Response	23
(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.	**Yes**	EOP Annex A – Weather Emergency	25
(6) Each relevant annex, as detailed in subsection (e) of this section, and other annexes applicable to an entity.	**Yes**	EOP Annexes	

PUC Rule 25.53	Applicability	EOP Section	Page Number
(e) Annexes to be included in the emergency operations plan.	**Yes**	EOP Annexes	
(1) An electric utility, a transmission and distribution utility, a municipally owned utility, and an electric cooperative a must include in its EOP for its transmission and distribution facilities the following annexes:	**Yes**	EOP Annexes	
(A) A weather emergency annex that includes:	**Yes**	Annex A – Weather Emergency	25
(i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title (relating to Weather Emergency Preparedness); and	**Yes**	EOP Annex B – Transmission & Distribution Cold or Hot Weather Emergency	27
(ii) a checklist for transmission or distribution facility personnel to use during 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;	**Yes**	EOP Annex B – Transmission & Distribution Cold or Hot Weather Emergency	27
(B) A load shed annex that must include:	**Yes**	EOP Annex E – Load Shed	35
(i) procedures for controlled shedding of load;	**Yes**	EOP Annex E – Load Shed	35
(ii) priorities for restoring shed load to service; and	**Yes**	EOP Annex E – Load Shed	35
(iii) a procedure for maintaining an accurate registry of critical load customers, as defined under 16 TAC §25.5(22) of this title (relating to Definitions), §25.52(c)(1) and (2) of this title (relating to Reliability and Continuity of Service) and §25.497 of this title (relating to Critical Load Industrial Customers, Critical Load Public Safety Customers, Critical Care Residential Customers, and Chronic Condition Residential Customers), and TWC §13.1396 (relating to Coordination of Emergency Operations), directly served, if maintained by the entity. The registry must be updated as necessary but, at a minimum, annually. The procedure must include the processes for providing assistance to critical load customers in the event of an unplanned outage, for communicating with critical load customers during an emergency, coordinating with government and service agencies as necessary during an emergency, and for training staff with respect to serving critical load customers;	**Yes**	EOP Annex E – Load Shed	35
(c) A pandemic and epidemic annex;	**Yes**	EOP Annex F – Pandemic and Epidemic	40
(D) A wildfire annex;	**Yes**	EOP Annex G – Wildfire	41
(E) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management (TDEM);	**No**	EOP Annex H – Hurricane	42
(F) A cyber security annex;	**Yes**	EOP Annex I – Cybersecurity	43
(G) A physical security incident annex;	**Yes**	EOP Annex J – Physical Security	45

PUC Rule 25.53	Applicability	EOP Section	Page Number
(H) A transmission and distribution utility that leases or operates facilities under PURA §39.918(b)(1) or procures, owns, and operates facilities under PURA §39.918(b)(2) must include an annex that details its plan for the use of those facilities; and	**No**		
(I) Any additional annexes as needed or appropriate to the entity's particular circumstances.	**Yes**	EOP Annex K – Substation & Transmission Emergency Response Plan EOP Annex L – Underground Integrated Operations Emergency Response Plan EOP Annex M – Enterprise Fuel Supply Conservation Plan	46 - 48
(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:	**Yes**	EOP Document	
(A) A weather emergency annex that includes:	**Yes**	EOP Annex A – Weather Emergency	25
(i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;	**Yes**	EOP Annex C – Power Generation - Cold or Hot Weather Emergency	29
(ii) verification of the adequacy and operability of fuel switching equipment, if installed; and	**Yes**	EOP Annex C – Power Generation - Cold or Hot Weather Emergency	29
(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;	**Yes**	EOP Annex C – Power Generation - Cold or Hot Weather Emergency	29
(B) A water shortage annex that addresses supply shortages of water used in the generation of electricity;	**Yes**	EOP Annex D – Water Shortage	33
(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;	**Yes**	EOP Annex C – Power Generation - Cold or Hot Weather Emergency	29
(D) A pandemic and epidemic annex;	**Yes**	EOP Annex F – Pandemic and Epidemic	40
(E) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	**No**	EOP Annex H – Hurricane	42
(F) A cyber security annex;	**Yes**	EOP Annex I – Cybersecurity	43

PUC Rule 25.53	Applicability	EOP Section	Page Number
(G) A physical security incident annex; and	**Yes**	EOP Annex J – Physical Security	45
(H) Any additional annexes as needed or appropriate to the entity's particular circumstances.	**Yes**	*(No additional Power Generation Annexes are included)*	
(3) A REP must include in its EOP the following annexes:	**No**		
(A) A pandemic and epidemic annex;	**No**		
(B) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	**No**		
(C) A cyber security annex;	**No**		
(D) A physical security incident annex; and	**No**		
(E) Any additional annexes as needed or appropriate to the entity's particular circumstances.	**No**		
(4) ERCOT must include the following annexes:	**No**		
(A) A pandemic and epidemic annex;	**No**		
(B) A weather emergency annex that addresses ERCOT's plans to ensure continuous market and grid management operations during weather emergencies, such as tornadoes, wildfires, extreme cold weather, extreme hot weather, and flooding;	**No**		
(C) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	**No**		
(D) A cyber security annex;	**No**		
(E) A physical security incident annex; and	**No**		
(F) Any additional annexes as needed or appropriate to ERCOT's particular circumstances.	**No**		
(f) Drills.	**Yes**		
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.	**Yes**	EOP Section 1.4 – Affidavit Attached Affidavit	16
(g) Reporting requirements.	**Yes**	Not included in EOP Document	

PUC Rule 25.53	Applicability	EOP Section	Page Number
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.	**Yes**	Not included in EOP Document	

1.3. Record of Distribution

This EOP has been distributed to the following individuals. The CPS Energy personnel listed below have received training on this EOP. CPS Energy provides various training modules to employees on responding to emergencies and hazards which are required on a continual basis.

	Name	Title	Date of Access
1.	Rudy Garza	Interim President & CEO	6/1/2022
2.	Benjamin Ethridge	EVP Energy Supply	6/1/2022
3.	Cory Kuchinsky	Chief Financial Officer & Treasurer	6/1/2022
4.	DeAnna Hardwick	Interim EVP Customer Strategy	6/1/2022
5.	Kathleen Garcia	VP Govt. & Reg. Affairs & Public Policy	6/1/2022
6.	Lisa Lewis	Chief Administration Officer	6/1/2022
7.	Melissa Sorola	VP Corporate Communications & Marketing	6/1/2022
8.	Richard Lujan	Interim VP Gas Solutions	6/1/2022
9.	Richard Medina	Interim EVP Energy Delivery Services	6/1/2022
10.	Shanna Ramirez	Chief LEO General Counsel & Board Secretary	6/1/2022
11.	Vivian Bouet	Chief Information Officer	6/1/2022
12.	William McCarson	Business Continuity Program Manager	6/1/2022

1.4. PUCT Affidavit for Emergency Operations Plan

The Affidavit required by (16 TAC § 25.53 – Electric Service Emergency Operations Plans) is submitted as an attachment to this EOP.

The Affidavit, signed by Rudy Garza, as Interim President & CEO of the City Public Service Board of the City of San Antonio, ("CPS Energy"), states the following:

1. That he is the highest-ranking representative, official, or officer of CPS Energy with binding authority over CPS Energy;
2. That 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;
3. The EOP has been reviewed and approved by the appropriate executives;
4. That CPS Energy is in compliance with 16 TAC § 25.53(f) in conducting drills;
5. The EOP or appropriate summary has been distributed to local jurisdictions as needed;
6. That CPS Energy maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
7. That CPS Energy's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

2. Emergency Contacts

The following is a list of primary and backup emergency contacts for CPS Energy who can immediately address urgent requests and questions from the **Texas Public Utility Commission** during an emergency.

List of Primary and Secondary Contacts

Name	Title	Mobile Phone	Email
Rudy Garza	Interim President & CEO	(210) 793-5984	rdgarza@cpsenergy.com
Shanna Ramirez*	Chief Legal & Ethics Officer, General Counsel & Board Secretary	(210) 793-8700	snramirez@cpsenergy.com
Lisa Lewis	Chief Administration Officer	(210) 705-4985	LDLewis@CPSEnergy.com
DeAnna Hardwick	Interim EVP Customer Strategy	(210) 382-0210	dhardwick@cpsenergy.com
Kathleen S. Garcia*	VP Govt. & Reg. Affairs & Public Policy	(512) 461-9433	ksgarcia@cpsenergy.com
Richard Lujan	Interim VP Gas Solutions	(210) 288-0951	RLujan@CPSEnergy.com
Richard G. Medina*	Interim EVP Energy Delivery Services	(210) 275-4397	rgmedina@cpsenergy.com
Curt Brockmann	VP Compliance & Ethics	(210) 475-2083	CDBrockmann@CPSEnergy.com
Benny Ethridge*	Exec VP Energy Supply	(210) 612-6973	BLEthridge@cpsenergy.com

* Denotes Primary

3. List of CPS Energy Response Plans

The following is a list of response plans developed and maintained by CPS Energy to address emergencies, hazards and threats related to the PUC EOP Rule 25.53. As noted in the Executive Summary, these plans contain confidential information, and the unredacted versions of these plans are on file with ERCOT. CPS Energy also develops and maintains additional response plans not related to the Rule, including (but not limited to) response to natural gas pipeline emergencies, environmental spill response, black start, medical emergencies, building/site evacuation, and lake/dam emergency.

Plan Name	Purpose/Use	Plan Owner Point of Contact
Enterprise Cybersecurity Incident Response Plan	These procedures provide general guidance for responding to suspected or confirmed cybersecurity incidents or events.	Pixley, Brandon
Enterprise Fuel Supply Conservation Plan	Provides guidance to CPS Energy management personnel for response to an actual or potential shortage of transportation fuel (gasoline, diesel, E85).	McCarson, William
Enterprise Incident Management Plan	Highest level response management guidance for the Enterprise Incident Management Team. Use as a starting place for any type of incident.	McCarson, William
Enterprise Storm Plan	Guidelines for response to tropical cyclones, winter storms or other severe weather events that have potential for widespread outages.	McCarson, William
Enterprise Wildfire Plan	Provides CPS Energy management with information and guidance for response to a wildfire incident that threatens our operational areas and/or personnel.	McCarson, William
GOP-A-13 - EOP-004-3 – Event Reporting	This Operating Plan & Procedure provides direction to the Energy Controller for Event Reporting. Energy Controllers are trained in the use of this document.	Albers, Keith W.
Seasonal Preparedness Procedure A-07	The purpose of this procedure is to define the requirements that must be completed for the seasonal preparation of the Transmission, Substation, and Distribution Systems.	Lyle, Zachary
Health Event Continuity of Operations Plan	Guidelines for response to pandemic or outbreak of infectious disease.	Duarte, Cristina
Power Generation Emergency Response Operating Procedures	General power station emergency procedures. This includes Emergency Response Operating Procedures for various Power Plants.	McDonnell, Ryan R.
Substation & Transmission Emergency Response Plan	Provides information and guidance for responding to potential emergency incidents that may occur during the course of substation and transmission operations.	Lentz, David L
Underground Integrated Operations Emergency Response Plan	Provides information and guidance for crews and managers in responding to potential emergency incidents that may occur during operations.	Junkin, Janna K.

Plan Name	Purpose/Use	Plan Owner Point of Contact
Energy Supply and Market Operations Communication Plan GOP-A-15	Provides a procedure to ensure uniform communications affecting electric grid reliability, electric and gas supply.	Albers, Keith W.
Communications NERC COM-002-02	Provides Paging Guidelines related to various communications events.	Albers, Keith W.

4. Approval and Implementation

4.1. Periodic Review

This EOP must be continuously maintained, and will be reviewed annually, at minimum. The annual review and updated must be completed by March 15 each year following this year.

Review #	Date of Review	Reviewer's Name/Title	Reason for Review	Revisions Required?
1.	6/1/2022	William McCarson, Business Continuity Program Manager	Initial Publication	No
2.				

4.2. Plan Review and Approval

The following personnel are responsible for reviewing, maintaining, approving and implementing this EOP. Changes to the EOP are made by the **Business Continuity Program Manager**. This EOP was approved on June 1, 2022.

Action	Name	Title
Plan Approved	Rudy Garza	Interim President & CEO
Plan Approved	Benjamin Ethridge	EVP Energy Supply
Plan Approved	DeAnna Hardwick	Interim EVP Customer Strategy
Plan Approved	Kathleen Garcia	VP Govt. & Reg. Affairs & Public Policy
Plan Approved	Lisa Lewis	Chief Administration Officer
Plan Approved	Melissa Sorola	VP Corporate Communications & Marketing
Plan Approved	Richard Medina	Interim EVP Energy Delivery Services
Plan Approved	Shanna Ramirez	Chief LEO General Counsel & Board Secretary
Plan Approved	William McCarson	Business Continuity Program Manager

4.3. Record of Revisions

As of June 1, 2022, this EOP supersedes previous EOPs. The following table summarizes all changes made to the EOP:

Change #	Date	Description	Made by
0	05/26/2022	Original Summary EOP	RBS

5. Communications Plan

The CPS Energy **Enterprise Incident Management Plan, Section 9 Media and Public Affairs** describes how public information about an incident is disseminated to all appropriate audiences, both internally and externally.

During an incident, the information provided to employees, families, customers, communities, authorities, and the public can impact the successful resolution of the incident. In extreme cases, it is possible that the timely, useful and accurate reporting of incident information can be the difference between life and death. The information provided by the **Enterprise Incident Management Team** will impact the perception of the response and the perceived credibility of the Company.

In the first hours of an incident, media and public affairs efforts are focused on the following principles:

- Alerting company employees, nearby facilities, transient parties, and the public of the incident
- Providing awareness of public safety issues arising because of the incident, or communicating that there are no hazards
- Reporting relevant and current facts of the incident
- Conveying empathy and compassion to impacted personnel, families, and stakeholders
- Describing how the incident will be managed in coordination with public and private response organizations

The news media have a recognized role in informing the public during emergencies. It is in CPS Energy's business interests, and part of its responsibility to the public, to engage appropriately with the news media - not only during and after an incident, but also before, so the community can be prepared, and to build understanding, credibility and relationships for the company over the long term.

When an emergency occurs, the Manager, Director or VP of the affected business area will immediately notify the **VP of Corporate Communications**. The VP of Corporate Communications, or designee(s), will notify and assemble, if necessary, key members of the CPS Energy **Emergency Communications Team**. This team may activate an **Emergency Media Center** in the most safe and effective location.

This team will establish immediate contact with Operations and Customer Success leadership to ensure consistent messaging to customers (including critical load customers), fuel suppliers, governmental entities & officials, the **Public Utility Commission (PUCT)**, the **Office of Public Utility Counsel (OPUC)** and the **Electric Reliability Corporation of Texas (ERCOT)**. This two-way communication is handled through **Corporate Communication's** established direct contacts within each of these entities. A Customer Service Bulletin regarding the situation would be developed to assist CPS Energy **Customer Service Representatives** with customer concerns and complaints.

CPS Energy References:

- Enterprise Incident Management Plan, Section 9 – Media and Public Affairs
- Energy Supply and Market Operations Communication Plan GOP-A-15
- Communications NERC COM-002-02

6. Pre-identified Supplies for Emergency Response

The CPS Energy **Enterprise Incident Management Plan, Section 4.6-30**, contains response guidelines for supply chain resources in an emergency. The CPS Energy **Supply Chain** Business Unit maintains a list of critical supplies for electric outage restoration.

Other pre-identified supplies for emergency response are contained in the affiliated CPS Energy plans listed in **Section 3** of this EOP, depending on the type and location of the emergency incident.

CPS Energy References:

- Enterprise Incident Management Plan, Section 4.6-30 – Supply Chain
- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*
- Emergency Response Operating Procedures – Unit B*
- Emergency Response Operating Procedures – Unit C*
- Emergency Response Operating Procedures – Unit D*
- Emergency Response Operating Procedures – Unit E*
- Emergency Response Operating Procedures – Unit F *

*Unit names withheld for security reasons

7. Staffing During Emergency Response

The CPS Energy **Enterprise Incident Management Plan, Section 4 Enterprise Incident Management Team** describes the staffing of this high-level response team.

The CPS Energy **Enterprise Incident Management Team** serves as the highest-level response team for incident management, business continuity and emergency response management for CPS Energy's organization. The **Enterprise Incident Management Team** is organized to efficiently and effectively conduct response management activities. The team is staffed by CPS Energy executives, upper management, and other functional managers as needed to conduct a major response effort. In a sustained response, additional personnel may be added to assist the team as needed.

The **Enterprise Incident Management Team** is led by an **Enterprise Incident Manager**, who has ultimate responsibility and authority over the response effort. **Enterprise Incident Manager** alternates are assigned to ensure continuous availability.

The **Enterprise Incident Management Team** is modular - meaning that team positions are activated and deactivated as needed, based on the type and magnitude of the incident. The staffing and organization of the team will be determined by the **Enterprise Incident Manager** on a case-by-case basis during the incident and will grow in complexity to meet the response requirements.

The **Enterprise Incident Management Team** organization and function follows the principles of the **Incident Command System (ICS)**. This includes the principles of safety, functional team positions, chain of command, unity of command, modular organization, formal communication, documentation, efficient use of resources, and incident planning.

In addition, the CPS Energy response plans listed in **Section 3** of this EOP contain additional staffing information for specific types of incident response.

CPS Energy References:

- Incident Management Plan, Section 4 – Enterprise Incident Management Plan
- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*
- Emergency Response Operating Procedures – Unit B*
- Emergency Response Operating Procedures – Unit C*
- Emergency Response Operating Procedures – Unit D*
- Emergency Response Operating Procedures – Unit E*
- Emergency Response Operating Procedures – Unit F *

*Unit names withheld for security reasons

8. Identifying Weather Hazards and Activating EOP

The **Enterprise Storm Plan (Plan)** is designed to guide CPS Energy personnel in responding to severe weather events that may cause threats to personnel safety, disruptions in travel routes, flooding, damage to critical energy infrastructure, environmental incidents, business disruptions and customer outages (gas and electric). This Plan may be implemented for any type of severe weather event.

Providing customers with accurate and timely information regarding their outage and executing an efficient and effective restoration effort is a primary goal of CPS Energy's storm response.

CPS Energy utilizes a private weather service for real-time monitoring. **Energy Supply & Market Operations** uses a weather impact analysis service.

The **NOAA National Weather Service (NWS)** and **National Hurricane Center** are official sources of weather information for CPS Energy. The **Storm Prediction Center (SPC)** is part of the NWS and provides timely and accurate forecasts and watches for severe thunderstorms and tornadoes over the contiguous United States. The SPC also monitors for hazardous winter weather and fire weather events and issues specific products for those hazards.

Weather forecasts are monitored daily by the following BU/Areas:

- Business Continuity Program
- Energy Supply and Market Operations (ESMO)
- Power Generation
- System Operations

The Business Continuity Program subscribes to weather alert services, including:

- ReadySouthTexas
- FEMAAlerts

Severe weather alerts are generated by **ESMO** weather monitoring personnel and are distributed to key BU/Area management. When a potential storm or severe weather event threatens the entire enterprise, the **Business Continuity Program Manager** alerts the **Enterprise Incident Management Team** via email or other more expeditious methods as necessary. The **National Weather Service** representative to the **San Antonio/Bexar County Emergency Operations Center (EOC)** provides local forecast briefings during storm events and is available for consultation as needed. The acting **Enterprise Incident Manager** shall activate the **Enterprise Incident Management Team** when a storm threatens the service area and results in a **Level 2 Electric Event** or higher, or has potential reach that threshold. Implementation of this Plan for any severe weather event, regardless of potential impact, is at the discretion of the acting **Enterprise Incident Manager**.

See the **Enterprise Incident Management Plan** for **Enterprise Incident Management Team** activation procedures and response guidance.

CPS Energy References:

- Enterprise Storm Plan
- Enterprise Incident Management Plan

Annex A - Weather Emergency

The CPS Energy **Enterprise Incident Management Plan, Section 3.13 Severe Weather,** contains response guidelines for a weather emergency.

Severe weather can threaten people, assets and operations. The health and safety of employees and the public is always the highest priority when responding to severe weather events. Protecting the environment from oil or hazardous material discharges is the next highest priority. Restoration of energy delivery and service to customers in the shortest timeframe safely possible is the goal of effective storm response strategies. This includes any type of severe weather event, including, but not limited to:

- Tropical Cyclones
- Winter Storms (freezing temperatures, snow, ice, etc.)
- Tornadoes
- Thunderstorms
- Flooding

For Sudden Threats (such as tornado):

- All personnel should take appropriate action as directed by public officials to seek shelter
- Personnel will follow the Emergency and Evacuation Plan for the building. The Emergency and Evacuation Plan contains guidelines for Shelter-in-Place
- The Power Plant Emergency Operations Procedures contain guidelines for shelter-in-place for Power Generation
- The **Emergency Coordinator** is in charge of shelter-in-place, personnel accountability, and coordinating emergency officials
- **Floor Monitors** will assist with shelter-in-place orders
- All personnel will seek safety until conditions are clear
- Report any impact to Leadership and the **Enterprise Incident Manager**

Next, the CPS Energy **Enterprise Storm Plan** is designed to guide CPS Energy personnel in responding to severe weather events that may cause threats to personnel safety, disruptions in travel routes, flooding, damage to critical energy infrastructure, environmental incidents, business disruptions and customer outages (gas and electric). This Plan may be implemented for any type of severe weather event.

Safety and continuation of energy delivery are the key drivers in storm response. Safety of both CPS Energy employees and the public is paramount to the success of all restoration efforts. The restoration effort will only be considered completely successful when all customers have been restored. Restoration of energy delivery and service to CPS Energy customers in the shortest timeframe safely possible is the goal of effective storm response strategies.

Storms represent threats to CPS Energy people, assets and operations, and can affect significant portions of the generation, transmission and distribution system, as well as gas transmission and distribution systems. These natural events include hurricane/tropical storms, winter storms, thunderstorms, tornado/microbursts, flooding and other types of severe weather. This Plan anticipates a worst-case event, where a significant percentage of customers are without electric or gas service. It is expected that CPS Energy will experience a loss in distribution poles, a significant number of distribution spans down and some damage to the transmission system. Loss of gas transmission and distribution is a possibility

due to flood water impact or reduction in the State's gas production. It is fully expected that any lesser event will use the same basic plan, although it will be scaled down to address only the affected areas of the service territory.

The health and safety of CPS Energy personnel people and the public is always the highest priority when responding to severe weather events. Protecting the environment from oil or hazardous material discharges is the next highest priority.

The forces that impact the energy infrastructure from storms may include any combination of the following:

- Flood
- Hail
- Ice
- Landslide
- Lighting
- Snow
- Tornado/microburst
- Wind

The **Enterprise Storm Plan** is intended to be used in conjunction with the **Enterprise Incident Management Plan**.

CPS Energy References:

- Incident Management Plan, Section 3.13 – Severe Weather
- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*
- Emergency Response Operating Procedures – Unit B*
- Emergency Response Operating Procedures – Unit C*
- Emergency Response Operating Procedures – Unit D*
- Emergency Response Operating Procedures – Unit E*
- Emergency Response Operating Procedures – Unit F *

*Unit names withheld for security reasons

Annex B - Transmission & Distribution - Cold or Hot Weather Emergency

Summary

The CPS Energy **Enterprise Storm Plan, Section 3.13 Appendix A - Hot/Cold Weather Emergency Procedure, A.1 Substation and Transmission** and **Seasonal Preparedness Procedure** contains response guidelines for a weather emergency.

HOT WEATHER EMERGENCY

This section will serve as the plan of actions to be taken immediately prior to and during a hot weather emergency.

System Operations, Substation & Transmission

- Review and perform hot weather safety checklists for field personnel:
  - Heat Exhaustion Aversion
  - Fire Prevention Awareness
  - Heat Acclimation Awareness
- Conduct power flow analysis to identify any post-contingency thermal overloads and voltage violations to the transmission system at hot weather peak conditions.

Distribution

- Review and perform hot weather safety checklists for field personnel:
  - Heat Exhaustion Aversion
  - Fire Prevention Awareness
  - Heat Acclimation Awareness
- Conduct circuit analysis for hot weather peak conditions and execute load mitigation plans as needed.

COLD WEATHER EMERGENCY

This section will serve as the plan of actions to be taken immediately prior to and during a cold weather emergency.

System Operations, Substation & Transmission

- Review and perform cold weather safety checklists for field personnel:
  - Cold Stress Signs (Hypothermia)
  - Driving in Hazardous Road Conditions
  - Suitable FR compliant Clothes layering
- Conduct power flow analysis to identify any post-contingency thermal overloads and voltage violations to the transmission system at cold weather peak conditions.

Distribution

- Review and perform cold weather safety checklists for field personnel:
  - Cold Stress Signs (Hypothermia)
  - Driving in Hazardous Road Conditions
  - Suitable FR Compliant Clothes Layering

- Conduct circuit analysis for cold weather peak conditions and execute load mitigation plans as needed.

CPS Energy References:

- Seasonal Preparedness Procedure A-07
- Enterprise Storm Plan – Appendix A

Annex C - Power Generation - Cold or Hot Weather Emergency

Summary

The CPS Energy **Enterprise Storm Plan** addresses activation of the **Enterprise Incident Management Team** for response to all severe weather events. Each Power Plant maintains a **Hot & Cold Weather Emergency Plan** that is specific to each site.

Hot Weather Emergency

This procedure provides Power Generation's actions for addressing the impact of hot weather conditions on generating units. This procedure also provides detailed steps for responding to hot weather impacts on plant systems for summer operations.

Summer – for the purposes of Summer Readiness, the period is defined as May 1st through September 30th.

A Hot Weather Emergency is initiated when any of the following criteria are met:

- Temperature Threshold:
  - Forecast Region: San Antonio area (KSAT)
  - Temperature Forecast: Greater than a generating unit's highest ambient design operating temperature, and
  - Temperature Duration: More than 4 hours
- Operating Conditions:
  - ESMO issued Screwdriver Alert, and
  - Power Generation in a Condition Red Operating Mode, and
  - ERCOT issued Energy Emergency Alert Level-3, and
  - Ambient temperature forecasted to be greater than a generating unit's max ambient design for any duration.
- Procedures:
  1. Energy Supply & Market Operations (ESMO) will monitor temperature forecasts for the San Antonio, Houston, and Dallas-Fort Worth areas.
  2. ESMO will assess ERCOT market conditions for demand expectations and potential for emergent grid conditions.
  3. ESMO will communicate ERCOT Energy Emergency Alert levels via email to Genco Alerts distribution email
  4. Plant Operations will implement emergency protocols when either the Temperature Threshold or Operating Conditions for a Hot Weather Emergency are met.
  5. Plant Operations will monitor equipment identified in the plant specific hot weather emergency checklist, or thermally sensitive equipment identified in the plant specific summer readiness checklist. This equipment will be monitored at least 8 hours prior to the peak hour daily maximum temperature forecast.

6. Plant Operations will monitor DCS Alarms to increase surveillance of critical equipment's thermal health.
7. Plant Operations will immediately escalate any operational concerns to ESMO and Plant Management.
8. Plant Management will assess the need to increase critical staffing levels.

Cold Weather Emergency

This procedure provides Power Generation's actions for addressing the impact of cold weather conditions on generating units. This procedure also provides detailed steps for responding to cold weather impacts on plant systems for winter operations.

ESMO – Energy Supply & Market Operations (ESMO) is the designated organization to order Cold Weather Alerts.

Winter Readiness Coordinator(s) – Designated person(s) to coordinate Initial Winter Readiness Activities and maintain Winter Readiness Documentation.

Initial Winter Readiness Activities – Activities to be performed in preparation for winter.

Cold Weather Level 1 Alert – ESMO issues a Cold Weather Level 1 Alert when the temperature in the San Antonio area is forecasted to be less than 33°F for 4 to 8 consecutive hours within the next 96 hours.

Cold Weather Level 2 Alert - ESMO issues a Cold Weather Level 2 Alert when the temperature in the San Antonio area is forecasted to be less than 33°F for 8 to 24 consecutive hours within the next 96 hours.

Cold Weather Level 3 Alert - ESMO issues a Cold Weather Level 3 Alert when the temperature in the San Antonio area is forecasted to be less than 33°F for more than 4 hours within the next 36 hours and one or more of the following conditions is met:

1. Forecast includes precipitation (possibility of sleet, snow, ice)
2. Forecast includes sustained winds in excess of 20 mph
3. Forecasted temperature: any instance less than 20°F
4. Forecasted temperature: Less than 33°F for more than 24 hours

Cold Weather Level 1 Alert

In the event a **Cold Weather Level 1 Alert** is broadcast, the plant will complete the following tasks.

1. Review winter readiness book.
2. Check current consumables and order as necessary.
3. Reply (to all) to the ESMO alert email when complete.
4. Verify heat trace panels are in auto, circulating water equipment and transmitter cabinet heaters working every 8 hours and end of run heat trace lights EVERY 24 HOURS.
5. Complete Freeze Protection Hourly Round sheets at the following intervals:
    1. Ambient temperature less than 40 degrees – once a shift (12 hours).
    2. Ambient temperature less than 33 degrees – once every 8 hours.

Cold Weather Level 2 Alert

In the event a **Cold Weather Level 2 Alert** is broadcast, the plant will complete the following tasks in addition to ALL Level 1 tasks.

1. Check current consumables and order as necessary.
2. Reply (to all) to the ESMO alert email when complete.
3. Make rounds to check electric heaters and salamanders working/fully fueled.
4. Verify heat trace panels are on in auto, circulating water equipment and transmitter cabinet heaters working every 4 hours and end of run heat trace lights EVERY 12 HOURS.
5. Complete Freeze Protection Hourly Round sheets at the following intervals:
    1. Ambient temperature less than 40 degrees – once a shift (12 hours).
    2. Ambient temperature less than 33 degrees – once every 4 hours.
6. Place maintenance personnel on call duty.
    1. Maintenance Manager will coordinate

Cold Weather Level 3 Alert

In the event a **Cold Weather Level 3 Alert** is broadcast, the plant will complete the following tasks in addition to all level 1 & 2 Tasks.

1. Make rounds to check electric heaters and salamanders working/fueled.
2. Check current consumables and order as necessary.
3. Reply (to all) to the ESMO alert email when complete.
4. Run all auxiliary cooling water pumps on each unit.
5. Stroke any aux cooling water controllers that are closed, once every hour.
6. Verify heat trace panels are on in auto, check circulating water equipment and transmitter cabinet heaters working every hour and end of run heat trace lights EVERY 12 HOURS.
7. Complete Freeze Protection Hourly Rounds sheets at the following interval:
    1. Ambient temperature less than 40 degrees – once a shift (12 hours).
    2. Ambient temperature less than 33 degrees – once every hour.
8. Level 3 alert plant staffing establishes minimal additional operations and maintenance staffing needs for a severe winter weather event. It is the responsibility of the Senior Plant Manager to modify the staffing requirements as they see necessary to respond to unique conditions of an event and provide 24 hr coverage.

Fuel Switching

CPS Energy only has the capability of Fuel Switching at its Milton B. Lee East CT's. CPS Energy periodically tests the capabilities of this switching. Specific Operating procedures related to Fuel Switching are located with the Power Generation Emergency Response Operating Procedures – Unit A*. Specifically, the redacted procedure is **CPS-MBLE B5-8 Operations Manual OP-210**.

Checklists

Embedded within each of the Power Generation **Emergency Response Operating Procedures** are procedures utilized during the different weather events.

Restoration of Service

Within the Power Generation **Emergency Response Operating Procedures** is **Operations Manual - Hot Start**. These procedures are used to bring generation unit backs online following a trip or other event.

CPS Energy References:

- Enterprise Incident Response Plan
- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*
- Emergency Response Operating Procedures – Unit B*
- Emergency Response Operating Procedures – Unit C*
- Emergency Response Operating Procedures – Unit D*
- Emergency Response Operating Procedures – Unit E*
- Emergency Response Operating Procedures – Unit F *

*Unit names withheld for security reasons

Annex D - Water Shortage (Generation Facilities)

Summary

During 2010, the CPS Energy **Water Planning Committee** prepared a **Strategic Water Resources Plan** to secure sustainable water supplies to meet demands through 2060. One significant action cited for implementation in the plan is to prepare for droughts and develop action plans for managing water and maintaining service when drought or other water supply disruption occurs.

The CPS Energy **Drought Contingency Plan** identifies responsibilities and key actions during different drought conditions and provides a framework for action during water supply disruptions. It resides within the **Emergency Response Operating Procedures – Unit A***.

The **Drought Contingency Plan** provides a framework for CPS Energy to prepare for and respond to drought conditions. Local drought management rules and plans affect the water supplies utilized by CPS Energy at its Bexar County generating plants. Water quality or quantity in storage at Braunig and Calaveras lakes will likely be impacted during a drought, resulting in changed operational efficiencies or protocols even if not required from a regulatory perspective. The **Drought Contingency Plan** describes internal processes and actions to manage drought response that will improve resiliency during short- or longer-term droughts. Every drought and water shortage event will have unique characteristics that may require specific actions and timetables; however, pre-planning will better prepare the CPS Energy team to respond efficiently and effectively.

The **Drought Contingency Plan** is designed to help CPS Energy achieve the following goals:

- Protect and preserve public health, safety, and welfare by ensuring adequate power supply
- Prepare for drought conditions that could affect the CPS Energy portfolio of water supplies
- Conserve the available water supply in times of drought and emergency
- Comply with applicable drought management or critical period rules and permit conditions
- Maintain supplies for process and cooling water for all Bexar County plants at full generating capacity
- If full capacity is not achievable during severe drought, minimize the adverse impacts of water supply shortages on the generating capacity at CPS Energy Bexar County power stations
- Understand changes in the thermal capacity of the lakes and develop plans to coordinate unit loading

Drought Response

Drought response includes those actions taken when available water supply is actually or determined to be imminently insufficient to meet system needs. Certain actions will be required to comply with **Edwards Aquifer Authority (EAA)**, **City of San Antonio**, **East Central** or **South Texas Watermaster** regulations. Other drought response actions will be triggered by conditions at Braunig and Calaveras lakes. Response actions should be consistent with the severity of the drought, as indicated by both current and forecast conditions. Response actions should prioritize the avoidance of damage to generation facilities and should mitigate negative impacts to customers. Key drought response actions should also include the continued monitoring of water supply parameters and active communication with stakeholders.

Coordinate and Implement Communication Plan

Active communication is a key component of drought response. Every effort should be made to coordinate with water supply providers to exchange information, convey needs, expectations and constraints, and to make well informed and coordinated decisions. In addition, any anticipated impacts to customers and other stakeholders should be conveyed in advance of those consequences. Stakeholders and customers may also require regular updates regarding drought severity and ongoing drought response activities. Coordination with ERCOT regarding available capacity on the grid and requirements to supply power in excess of local demand will be required. During a drought event, communication should be maintained with entities.

Potential Drought Response Strategies

Drought response action should be taken to avoid damage to generation facilities and mitigate negative impacts to customers and other stakeholders due to drought. Suggested drought response actions that may be implemented are provided in this section. It is anticipated that the first five actions in the following list would be implemented during all droughts while the others would be considered and prioritized based on the conditions of a specific drought event.

- Determine if surface water supply (lake water) and/or Edwards Aquifer water supply are impacted
- File regulatory compliance reports with **EAA** and **South Texas Watermaster**, as required
- Limit discretionary use of water for CPS Energy operations (landscape irrigation, vehicle washing, etc.)
- Increase water quality and water temperature monitoring
- Adjust operating procedures, as appropriate
- Activate supplemental water supply options/alternate treatment, etc.
- Initiate purchased power agreements, if necessary
- Implement market operation plan; reduce off-system sales from lake plants, if necessary
- Implement communications plan
- Appeal to voluntary demand reduction across customer base
- Implement customer “cogeneration” measures and remote/satellite generation
- Implement established demand response protocols to reduce overall demand for power, if necessary
- Evaluate transferring water from Braunig Lake to Calaveras Lake
- Shift more generation to simple cycle gas turbine units at Braunig, simple cycle gas turbine and gas steam units at Leon Creek and Rio Nogales combined cycle plant, if needed

CPS Energy References:

- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*

*Unit name withheld for security reasons

Annex E - Load Shed (Transmission & Distribution Facilities)

Summary

1 Procedures for Controlled Shedding of Load

CPS Energy has an established procedure to safeguard the electric grid by shedding load, if necessary, through controlled intermittent customer outages. The **Electric Reliability Council of Texas (ERCOT)** manages the flow of electric power to millions of Texas customers. Controlled outages can occur whenever the demand for electricity in the State, also called the load, is greater than the supply. At times it may be necessary to reduce electrical demand because of a temporary shortfall in the available electricity supply. The reduction in supply could be caused by emergency outages of generators, transmission equipment, or other critical facilities, by short-term unavailability of fuel or generation, or by requirements or orders of government agencies.

ERCOT may declare an **Energy Emergency Alert (EEA)** Level 3 to begin implementing controlled outages when:

- The clock-minute average system frequency falls below 59.91 Hz for 20 consecutive minutes.
- Physical Responsive Capability (PRC) cannot be maintained above 1,430 MW or when the clock-minute average system frequency falls below 59.91 Hz for 25 consecutive minutes. Upon declaration of an EEA Level 3, ERCOT will implement any measures associated with EEA Levels 1 and 2 that have not already been implemented.
- PRC falls below 1,000 MW and is not projected to be recovered above 1,000 MW within 30 minutes, or when the clock-minute average frequency falls below 59.91 Hz for 25 consecutive minutes, ERCOT shall direct all **Transmission Service Providers (TSPs)** and **Distribution Service Providers (DSPs)** or their agents to shed firm Load, in 100 MW blocks, distributed as documented in the Operating Guides in order to maintain a steady-state system frequency at a minimum of 59.91 Hz and to recover 1,000 MW of PRC within 30 minutes.

When this occurs, CPS Energy, along with all other electric utilities, is directed by ERCOT to reduce electric consumption. This is done by implementing intermittent outages to customers within each utility's service territory. The process, called load shed, prevents larger, uncontrollable outages from occurring. When ERCOT declares an EEA 3, the **Systems Operations Shift Supervisor** will ensure that the current shift is aware of the EEA level and will inform the designated **Transmission Operator** of the load shed block as requested by ERCOT. **Transmission Operators** will implement their **Load Shed Procedure** when given a directive from ERCOT to shed load. The preferred method is to shed and rotate load with the load shed application included in the **Supervisory Control and Data Acquisition (SCADA)** system. If the load shed application is not available, the alternative method is to use a manual process which involves **Transmission Operators** opening breakers one at time using the **SCADA** system. Once the requested amount of load reduction is achieved, outages will roll through the CPS Energy service area until ERCOT lifts its directive.

Some electric distribution circuits must remain energized, if possible, to maintain adequate frequency on the CPS Energy grid and prevent uncontrolled loss, these circuits are called **Under Frequency Load Shed (UFLS)**. UFLS are a separate and distinct group of circuits that shed automatically without human intervention to protect the grid when significant frequency deviations occur within the ERCOT system.

ERCOT guidelines and regulations dictate the thresholds required as part of the UFLS protection architecture. UFLS may be used to supplement firm load shed directives when necessary.

If time and conditions permit, before any controlled outages are implemented, CPS Energy and other utilities may ask high-volume electric customers to voluntarily conserve energy, reducing the amount of electrical demand statewide. This process is known as "Demand Response". Demand reduction can significantly reduce the number of customers affected by a load shed event.

2 Priorities for Restoring Shed Load to Service

To minimize the amount of time each customer is affected during a load shed event, controlled outages are equally spread across as many customers as possible. As a result, many CPS Energy customers may be impacted by a load shed event, experiencing intermittent outages until ERCOT ends the directive. CPS Energy will attempt not to impact customers known to have significant and critical impacts for the public well-being, including major hospitals, emergency response facilities, and critical infrastructure that supports national security. To the extent possible, these critical services may be excluded from the load shed process.

CPS Energy makes every effort to maintain continuous service to all customers during emergency and weather-related events and minimize the duration of any outage. CPS Energy does not guarantee any customer a continuous, uninterrupted supply of power. Electric interruptions may occur due to many causes other than emergency situations. Critical customers, thus, are responsible for developing their own contingency plans, such as installing on-site back-up generation or installing uninterruptable power supplies, in the event interruption of power threatens the continuity of service.

City of San Antonio (CoSA) Fire Department and CoSA EOC Emergency Communication Protocol Procedure A-03 establishes activities and responsibilities for communications between CPS Energy and the City of San Antonio Emergency Operations Center (CoSA EOC). The primary communications between CPS Energy and CoSA EOC will reside with the CPS Energy representative as defined in the formal procedure and the CoSA Emergency Manager. A backup CPS Energy representative is also identified in the formal procedure. The CPS Energy representative's responsibility is to communicate any areas of concern to the CoSA EOC via telephone and e-mail notifications. The CoSA Emergency Manager (or other designated representative from the CoSA EOC) will also communicate with CPS Energy anytime the EOC is activated for events that could affect any assets or large portions of the CPS Energy service territory.

During times of significant events, (i.e., weather events, CPS Energy equipment failure, large customer outages, and communications from ERCOT predicting conditions that could lead up to rolling outages that would affect large portions of San Antonio and Bexar County), the CoSA EOC may request personnel from CPS Energy to report to the CoSA EOC or to the scene of the event. When notifications are received from ERCOT, System Operations will forward those alerts, via email, to CPS Energy Management, CoSA Emergency Manager, and the CoSA Assistant Emergency Manager. The CPS Energy representative will also contact these individuals via voice communications to explain the event's content and severity. The CoSA EOC will then forward this information to other state and local authorities. Additional communications are detailed in **Section 5 - Communications** of this EOP.

3 Critical Load Customers

CPS Energy provides an application process for critical load customers, which is provided below. If a facility is eligible, the customer will be added to a Master Designation List. The Master Designation List is maintained by the Critical Load Lead and reviewed by the Critical Load Committee. Only the Critical Load Committee can authorize changes to the list and must authorize its distribution to anyone external to CPS Energy. (The Critical Load Committee consists of the Executive Vice President - Customer Strategy, the Executive Vice President – Energy Delivery Services, and the Chief Legal Executive Officer – General Counsel. It meets monthly and at any additional ad hoc times needed to review and make designation determinations.)

Those facilities designated as critical load are eligible for normal load shed and are identified for prioritized restoration during non-load shed outages in accordance with established procedures. These customers may also receive additional communications during outages. The designation of critical load does not guarantee an uninterrupted supply of electricity. It is the responsibility of the customer to plan for alternative sources of electric power should a localized outage or significant load shed event occur.

APPLICATION PROCESS

1. Customer submits application via email to criticalload@cpsenergy.com.
2. The criticalload@cpsenergy.com inbox is monitored by the Critical Load Project Lead (or designee):
    a. Applications for Critical Care Customer designation should be submitted to cpsenergy.com/CriticalCare. If a Critical Care Customer application is received in the criticalload@cpseenrgy.com email, an attempt will be made to forward to the appropriate area.
3. Applications are reviewed for accuracy:
    a. The Project Lead reviews the application(s) for accuracy and determines who the appropriate CPS Energy Point of Contact (CPOC) is for customer interaction.
    b. The Project Lead then forwards the application to the CPOC along with any instructions required to assist the CPOC with understanding what information is missing or requires clarification on the application.
    c. If all information is complete and accurate, the CPOC then contacts the applicant and:
        1. Acknowledges receipt, and
        2. Provides information about the process and timeline.
    d. If there is missing or incomplete information, the CPOC contacts the applicant and:
        1. Acknowledges receipt,
        2. Requests additional information or clarifications and collaborates with applicant as needed, and
        3. Provides information about the process and timeline.

Note: Application cannot be considered until all information requested is received and is acknowledged as accurate and complete.

4. Once application is complete and accurate, the application is submitted via email to the Critical Load Lead:
    a. Applications will be reviewed.
    b. Applications are compiled and sent to the Critical Load Committee one week prior to regularly scheduled meetings.
    c. Critical Load Lead also reviews Master Designation List and provides list of pending expirations, required renewals, etc.
5. The Critical Load Committee meets regularly and makes determinations on applications.
6. The Critical Load Lead documents findings, action items and decisions from each meeting and communicates back to the CPOC.
7. CPOC communicates formal response back to customer/applicant.
8. The Critical Load Lead communicates updated lists internally.
    a. Master Designation List stored on the server are updated
    b. Critical load facilities are flagged in the system. This allows visibility of the outages so that these critical load facilities may be prioritized in accordance with established operating procedures during restoration efforts. If the situation allows, these critical load facilities may receive additional communication concerning outage events.

4 Critical Care Residential Customers

CPS Energy's **Critical Care Program** provides qualified customers additional time to pay their bills if they, or a dependent living in their home, require electric-powered medical equipment to sustain life or electric heating or cooling to prevent impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition in their home. To be eligible, the following conditions must be met:

- Applicant must provide confirmation from the patient's attending physician that medical equipment used by the patient is required at the applicant's residence through use of the CPS Energy **Critical Care Application**.
- Applicant must provide a renewed application from the attending physician every 24 months to continue participation in the Program if the patient requires electric service for a period longer than the initial 24 months.

To apply, customers can print an application from CPS Energy website at cpsenergy.com/Critical Care or call CPS Energy customer service line at (210) 353-2222 to request a mailed copy.

CRITICAL CARE PROGRAM CUSTOMERS NEED TO KNOW

- Acceptance in this Program does not guarantee uninterrupted power supply and/or guarantee service restoration times.
- Acceptance in this Program does not prevent the disconnection of service due to non-payment of Applicant's utility bill. In case of an emergency, please dial 911.

- Don't wait for an emergency or power outage, make a family emergency plan now. With medical equipment that requires electricity or medicine that needs refrigeration, verify the plan with a physician. Customers can find plan ideas at www.ready.gov/plan.

PROGRAM AWARENESS

CPS Energy maintains various avenues for all residential programs. In particular to the Critical Care Program:

- Energy Advisors support customer program education during new account establishment.
- Community Engagement Department conducts thousands of outreach events per year to which the Critical Care Program is advertised.
- The Customer Response Unit supports customers through personalized case management support and program education/enrollment support.
- Critical Care Program has a dedicated webpage.
- The Customer Response Unit conducts resource development sessions with various non-profits and community groups to enhance program awareness and create community advocators for CPS Energy residential programs to include the Critical Care Program.

PROGRAM ADMINISTRATION

Applications are approved when the customer's physician certifies on the Critical Care Application the patient seeking qualification in CPS Energy's Critical Care Program requires medical equipment and the application is faxed from the physician's medical practice to CPS Energy.

The **Community Engagement Department** is the administrator of the Critical Care Program. A **Customer Program Specialist** will determine if an application will be approved, put on hold or denied. The customer's account will receive a special CCC (Critical Care Customer) designation.

Various standard operating procedures were developed to maintain accuracy and quality control of the overall administration of the program. Additionally, only Customer Program Specialist are authorized to receive the role enabling program administration of the Critical Care Program Registry. Management will conduct periodic audits of applications processed.

-

REGISTRY ACCESS

- All individuals with access to customer accounts will have access to verify if a customer is actively enrolled in the Critical Care Program. This access is reserved to Energy Advisors, Billing Specialist, Community Engagement Department, and Customer Strategy Analytics Team
- Customer account information is considered Personal Identifying Information (PII) and is not allowed to be shared with other entities.

CPS Energy References:

- Enterprise Storm Plan – Section 7.4 Load Shedding
- City of San Antonio Fire Department and COSA EOC Emergency Communication Protocol Procedure A-03

Annex F - Pandemic and Epidemic

Summary

The CPS Energy **Health Event Continuity of Operations Plan (Health Event COOP)** is designed to ensure the continuation of CPS Energy's business activities and operations should a health event occur. For the purpose of this Plan, the term health event will be considered similar in nature to a pandemic event. A pandemic event is defined as a global disease outbreak. This occurs when a new virus or any other microbe can be transmitted between humans, for which there is little or no immunity, resulting in serious illness and death worldwide. A health event could impact a large percentage of the population and could last for several weeks to several months or years.

Having an effective **Health Event COOP** in place ensures that CPS Energy's core operations can be resumed within an acceptable period following such an incident. It allows CPS Energy Leadership to shift efficiently from its normal structure and organization to a structure and organization that facilitates rapid recovery and continuation of services. The ability to make this shift without delay is critical for CPS Energy to continue as a viable and stable utility provider during a potential health event.

BU/Area **Business Continuity Recovery Plans** provide a comprehensive, pre-identified list of all critical business and operational processes that must be continued if the organization experiences a partial or complete disruption. The **Health Event COOP** provides supplementary guidance to ensure that these core operations are continued without interruption to the extent possible.

The **Health Event COOP** applies to all operations, infrastructure, and resources necessary to continue CPS Energy's activities deemed essential. The **Health Event COOP** applies to all CPS Energy personnel, facilities, operations and business activities.

The objectives under this Plan will be consistent with the national public interest, the interests of local communities, employees, and CPS Energy general business interests. These objectives have been identified, in order, as:

- Provide for the health and safety of employees, families, contractors and visitors
- Provide continuous energy services to customers
- Ensure that all CPS Energy employees, contractors and visitors are aware of the information and educational resources before, during and after a Health Event
- Provide leadership, authority and succession during a Health Event
- Establish procedures to assure performance of critical business and operational processes
- Communicate with internal and external stakeholders
- Respond to the health event in coordination with public health authorities
- Incorporate actions and response measures to help slow the spread of infection in the community

CPS Energy also maintains a Health and Safety Policy, which provides for protective conduct and practices related to the COVID-19 pandemic. The policy provides CPS Energy with ability to adjust protocols in accordance with guidance from federal, state, and local authorities.

Annex G - Wildfire

Summary

The CPS Energy **Enterprise Wildfire Plan (Plan)** provides CPS Energy management with information and guidance for response to a wildfire incident that threatens CPS Energy personnel, infrastructure, and/or operational areas. This includes how CPS Energy would:

- Ensure the safety of personnel
- Control the source of the wildfire, and/or make the area safe for firefighting operations
- Protect the environment
- Protect property
- Continue or restore energy delivery to customers
- Minimize economic impact
- Communicate with internal and external stakeholders
- Support the overall community response effort

Should a wildfire originate from a CPS Energy source, this Plan provides information and guidance to initiate appropriate notifications and conduct initial response actions.

Periods of extended dry conditions and high winds contribute to wildfire risk in the CPS Energy operational area. Under such critical fire weather conditions, the National Weather Service will issue a Red Flag Warning, which means warm temperatures, very low humidity, and strong winds are expected to combine to produce an increased risk of fire danger. This warning is an alert to minimize potential fire sources and be more prepared for a wildfire incident. Red Flag Warnings are more frequent during the spring and fall fire weather seasons, February 15 – April 30 and October 1 - December 15. A Fire Weather Watch may be issued prior to the Red Flag Warning.

Fires can originate from CPS Energy infrastructure under the right conditions, including such sources as:

- Downed power lines (transmission and distribution)
- Transformer explosions (pole and pad mounts)
- Spontaneous pole fires (under certain dusty conditions)
- Natural gas leaks (distribution and transmission pipelines)
- Fuel leaks
- Vehicle-related incidents
- Equipment-related incidents
- Hot work

This Plan applies to all CPS Energy personnel, facilities, operations and business activities.

CPS Energy References:

- Enterprise Wildfire Plan

Annex H - Hurricane

Summary

CPS Energy does not have facilities located within a **Hurricane Evacuation Zone**, as defined by the **Texas Division of Emergency Management (TDEM)**. A **Hurricane Annex** is not being submitted for this category.

However, tropical storms and hurricanes can bring heavy rain, wind and other severe weather impact to the CPS Energy region. Planning and preparedness for these events, as well as other types of severe weather, is consolidated in the CPS Energy **Enterprise Storm Plan**. Additionally, within each of Power Generation Operations Procedures are a **Hurricane Response Plan**.

CPS Energy also supports the State-wide and community effort to receive and assist evacuees from the Gulf Coast region when necessary, as San Antonio is a refugee city. Such support is coordinated through liaison with the San Antonio/Bexar County Offices of Emergency Management.

CPS Energy References:

- Enterprise Storm Plan
- Emergency Response Operating Procedures – Unit A*
- Emergency Response Operating Procedures – Unit B*
- Emergency Response Operating Procedures – Unit C*
- Emergency Response Operating Procedures – Unit D*
- Emergency Response Operating Procedures – Unit E*
- Emergency Response Operating Procedures – Unit F *

*Unit names withheld for security reasons

Annex I - Cybersecurity

Summary

The CPS Energy **Enterprise Cybersecurity Incident Response Plan** provides general guidance for responding to suspected or confirmed cybersecurity incidents or events on the CPS Energy corporate environment.

The **Cybersecurity Business Unit** is the primary department responsible for handling cybersecurity incidents and events.

In the case of a suspected cybersecurity incident, each of the following points should be considered and acted upon. The principle steps in cybersecurity incident response are the following:

- Preparation
- Detection and Analysis
- Containment
- Eradication & Recovery
- Lessons Learned

A cybersecurity event is any observable occurrence in a network or system. Cybersecurity events may originate from alerts or notifications as a result from various event sources, such as Cybersecurity monitoring tools, device logs, or direct reports from employees or contractors.

A cybersecurity incident is any malicious act or suspicious event that compromises or disrupts a CPS Energy system(s) or network.

Incident includes but is not limited to:

- Harm to a computer system(s) or network
- Denial of Service Attack including:
    - Server
    - Router
    - Firewall
    - Gateway
- Unauthorized access to system(s) or network including:
    - System-level access
    - User-level access
    - Brute Force Attacks
    - SQL Attacks
- Virus or execution of malicious code that destroys data on the network or local computer
- Packet flooding within a network
- Intrusions
- Malicious code infection

The **Incident Response (IR) Commander** is ultimately accountable for the actions of the IR team and IR function. IR Commander is the person responsible for all aspects of an emergency response; including quickly developing incident objectives, managing all incident operations, application of resources as well

as responsibility for all persons involved. The IR Commander is the **VP Integrated Security Officer** or designee.

The **Incident Handler** is a member of the **Security Incident Response Team**. The Incident Handler coordinates logistics, communications, documentation, and the planning functions during an incident response. The Incident Handler is responsible for the initial incident assessment and completion of the Security Incident Response Handling Report.

The **Incident Responder** is the subject matter expert in network monitoring for unusual and potentially threatening activity. The Incident Responder assesses and responds to cybersecurity incidents and threats. The Incident Responder is part of the Security Incident Response Team. Contingent on the type of cybersecurity incident, the Incident Responder may also fill the role of Incident Handler.

CPS Energy References:

- Enterprise Cybersecurity Incident Response Plan

Annex J - Physical Security

Summary

The CPS Energy **Enterprise Incident Management Plan, Section 3.11 Security Incident Guidelines** includes response to any type of security incident. Security incidents can occur at any time or location and can potentially involve life-threatening situations. The safety of people is the highest priority. Rapid notification and coordination with law enforcement agencies is critical to the response. Security incidents include, but are not limited to:

- Active Shooter
- Assault/Workplace violence
- Bomb Threat (or any threat)
- Civil Unrest/Riot/Looting
- Robbery/Burglary
- Terrorism
- Unauthorized Access/Intruder

The Energy Market Operations, **Event Reporting Plan**, Procedure GOP-A-13 describes the specific CPS Energy Compliance management program for CPS Energy's Generator Owner and Generator Operator. The purpose of this Procedure is to provide uniform reporting processes for an event affecting reliability of the Bulk Electric System (BES). This Procedure is to be adhered to when events, impacting physical/cybersecurity, are identified. This procedure also ensures that the Energy Controller communicates these events to the appropriate internal departments and complies with external reporting standards and requirements.

CPS Energy References:

- Enterprise Incident Management Plan – Section 3.11 Security Incident Guidelines
- GOP-A-13 - EOP-004-3 – Event Reporting Plan

Annex K - Substation & Transmission Emergency Response Plan

Summary

The CPS Energy **Substation & Transmission Emergency Response Plan** provides information and guidance for responding to potential emergency incidents that may occur during the course of substation and transmission operations. This Plan establishes the **Substation & Transmission Incident Management Team** and describes how this team manages emergency incident response.

This Plan applies to the Substation & Transmission Business Unit, and other supporting BU/Areas when activated for incident response.

CPS Energy References:

- Substation & Transmission Emergency Response Plan

Annex L - Underground Integrated Operations Emergency Response Plan

Summary

The CPS Energy **Underground Integrated Operations Emergency Response Plan** provides information and guidance for crews and managers in responding to potential emergency incidents that may occur during the course of operations. This Plan establishes the **Underground Integrated Operations Incident Management Team** and describes how this team manages incident response.

This Plan applies to Underground Integrated Operations Business Unit, and other supporting Areas when activated for incident response.

CPS Energy References:

- Underground Integrated Operations Emergency Response Plan

Annex M - Enterprise Fuel Supply Conservation Plan

Summary

The **Enterprise Fuel Supply Conservation Plan** provides guidance to CPS Energy management personnel for response to an actual or potential shortage of transportation fuel (gasoline, diesel, and E85). Fuel shortages may result from political/social change, war, geo-political conflict, supply chain disruptions, natural disasters, man-made disasters, technological disasters or other unforeseen circumstances. Regardless of the cause of the shortage, this Plan provides strategies and information that CPS Energy may implement to maximize use of remaining fuel supplies, conserve fuel to the extent possible, and continue to fulfill the core mission of delivering energy (electric and gas) to CPS Energy customers.

This Plan applies to all CPS Energy areas that utilize vehicle fuel for any purpose. This Plan does not apply to power generation fuel (natural gas, coal and fuel oil) shortages. This Plan also provides strategies to address employee commuting strategies, as employees would be affected by fuel shortages for personal vehicles as well.

Should a vehicle fuel shortage occur, or threaten to occur, the CPS Energy **Enterprise Incident Manager** may activate the **Enterprise Incident Management Team** to respond to the incident. Activation of the Team will follow the procedures in the **Enterprise Incident Management Plan**. The Team will review the fuel conservation strategies in this Plan and determine their applicability and usefulness and implement such strategies as may be appropriate.

The goals of fuel shortage response will be to conserve as much fuel as possible, seek additional private or public sources of fuel, and continue delivery of electric and gas service to CPS Energy customers as safely and efficiently as possible.

Circumstances that may trigger implementation of fuel conservation strategies could include any combination of the following:

- Political or social change affecting oil or fuel availability
- Rapid drop in worldwide oil production
- Rapid increase in oil or fuel demand
- Import/export restrictions in the oil or fuel trade
- Degradations in U.S. oil refining capacity
- Oil or fuel transportation disruptions (International, National or Regional)
- Panic buying by the general public, resulting in local shortages
- Any other unforeseen events that lead to fuel shortages

If any of the above circumstances occur, or threaten to occur, the CPS Energy **Enterprise Incident Manager** will assess current fuel storage volumes, daily fuel consumption rates, and considering all relevant factors, may declare a fuel shortage incident and implement fuel conservation strategies as needed. Although it is difficult to predict the exact events that may lead to a fuel shortage, or its duration, it is generally recommended that fuel conservation strategies be implemented if CPS Energy faces uncertainty in future fuel availability at the 15-day storage consumption rate. However, this Plan may be activated at different trigger levels depending on the circumstances.

CPS Energy References:

- Enterprise Fuel Supply Conservation Plan

AFFIDAVIT

(16 TAC § 25.53 – Electric Service Emergency Operations Plans)

STATE OF TEXAS §

§

COUNTY OF BEXAR §

Before me, the undersigned Notary Public, personally appeared Rudy Garza, as Interim President & CEO of the City Public Service Board of the City of San Antonio, ("CPS Energy"), who, being by me duly sworn, stated under oath as follows:

1. That he is the highest-ranking representative, official, or officer of CPS Energy with binding authority over CPS Energy;
2. That 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;
3. The EOP has been reviewed and approved by the appropriate executives;
4. That CPS Energy is in compliance with 16 TAC § 25.53(f) in conducting drills;
5. The EOP or appropriate summary has been distributed to local jurisdictions as needed;
6. That CPS Energy maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
7. That CPS Energy's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

In witness whereof, this 26 day of May 2022.

Rudy Garza, Interim President & CEO

CPS Energy

ACKNOWLEDGEMENT

STATE OF TEXAS §

COUNTY OF BEXAR §

Before me, the undersigned authority, on this day personally appeared Rudy Garza, the Interim President and CEO of CPS Energy, a municipally-owned utility, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes of and consideration therein expressed, in the capacity therein stated that he was authorized to do so.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 26 day of May 2022.

NOTARY PUBLIC STATE OF TEXAS
BRENDA MARTINEZ
Notary ID # 1217965-2
My Commission Expires
February 26, 2025

Notary Public, State of Texas