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§25.53 EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

New Braunfels Utilities (NBU) Emergency Operations Plan (EOP) was developed to comply with 16 Tex. Admin. Code §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. 16 TAC §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide NBU with a clear set of guidelines, policies, and procedures to guide preparations, responses, and actions related to all phases and types of electric system emergencies. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (16 TAC §25.53) and is intended to guide the organization in its preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

NBU maintains the EOP in anticipation of a natural disaster and other situations involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- Provide the structure, policies, and procedures to guide the organization during all types of emergency conditions and situations.
- Enable NBU, other utility and governmental entities, customers, and stakeholders to coordinate and communicate effectively during emergency situations and events.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing NBU's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that NBU maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes and includes Appendices that provide additional information related to the EOP.

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 8 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes an introduction and purpose of the plan and a statement regarding the applicability of the EOP. And to emphasize the commitment of NBU's senior leadership, this section includes a "Message from the CEO" that underscores the importance of the plan and encourages all NBU personnel to learn the plan and work with their respective supervisors and teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for NBU and describes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 14 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan. This section includes the strategies, key policies, roles, and communications steps that NBU will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for NBU, and guidance for all employees regarding media interactions. The remainder of the Communications Plan

addresses the requirements in 16 TAC §25.53 regarding communications with the public, the media, NBU customers, the PUCT, OPUC, local and state governmental entities, officials, and (City/County) Emergency Operations Centers, ERCOT, and Critical Load customers. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

(Section-3) Pre-Identified Supplies for Emergency Response Plan:

This section begins on page 18 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides information on pre-Identified supplies for emergency Response and identifies the guidelines for the management of materials, supplies and resources that NBU may need during emergency events. The plan provides details regarding the internal roles and responsibilities; use of outside suppliers; advance preparation; location of materials and supplies; and other logistical information.

(Section-4) Staffing During Emergency Response Plan:

This section begins on page 19 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP provides information regarding staffing During Emergency response and the roles and assignments for NBU personnel before and during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that NBU will utilize and addresses potential work schedules for NBU personnel in significant and major system emergency events.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure:

This section begins on page 21 of the EOP and corresponds to §25.53(d)(5).

NBU has policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This final section also provides the policies and procedures related to the activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels identified in the plan.

EOP Annexes

Weather Emergency Annex:

This section begins on page 26 of the EOP and corresponds to §25.53(e)(1)(A).

The Weather Emergency Annex addresses preparation for both hot and cold weather emergencies. The key policies in this section set forth the requirement for NBU to develop and utilize a checklist for use in extreme weather situations to ensure that field personnel that are called upon to respond in emergency situations will have written guidance to organize their efforts.

Load Shed Annex:

This section begins on page 31 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding NBU preparations and actions for ERCOT Emergency Event Alerts (EEA) levels and include details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between NBU and the Lower Colorado River Authority Transmission Services Corporation (LCRA TSC) which is the Designated ERCOT Transmission Operator (DTO) for NBU, regarding the planning and preparation for load shed events and contains detailed information regarding other operational information for EEA events.

This Annex also contains information on NBU procedure for coordination of system restoration with LCRA TSC following a load shed event, and key policies and procedures that NBU utilizes for restoration from

significant system outage events. The final subsection of this Annex provides information on NBU's Critical Load Registry and information related to the maintenance of the registry, communication procedures with these customers, and other relevant information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 36 of the EOP and corresponds to §25.53(e)(1)(C).

In the Pandemic and Epidemic Annex, NBU has provided policies, procedures, and guidelines that are designed to prepare for pandemic and epidemic outbreaks, and to effectively deal with ongoing operations, restoration and communications issues presented by an epidemic or pandemic event. Key policies in this section address the steps NBU takes regarding prevention and preparation, employee safety, working remotely, and steps NBU takes to ensure adherence to policies implemented by state and local agencies.

Wildfire Annex:

This section begins on page 39 of the EOP and corresponds to §25.53(e)(1)(D).

The Wildfire Annex provides the guidelines, procedures and best practices related to wildfire mitigation and document NBU's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery. This section includes wildfire mitigation actions along with steps NBU would take to respond to a wildfire event.

Hurricane Annex:

This section begins on page 42 of the EOP and corresponds to §25.53(e)(1)(E).

NBU's service area is not located in a Hurricane Evacuation Zone (HEZ), and therefore NBU's EOP does not include this annex.

Cyber Security Annex:

This section begins on page 43 of the EOP and corresponds to §25.53(e)(1)(F).

The Cyber Security Annex provides the guidelines, procedures and best practices related to cyber security for the NBU owned substation facilities, office facilities and electric distribution system. Based on NBU's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security and employee education.

Physical Security Incident Annex:

This section begins on page 46 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures NBU has implemented to protect NBU-owned substation, transmission, and distribution facilities, office complexes and other facilities that are critical to the operation of the NBU electric distribution system. Based on NBU's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for NBU's facilities, visitors, and surveillance.

Plan Distribution and Training

The table below documents the distribution list of the EOP and the associated training document to NBU personnel including the date the training was completed by each employee:

NBU Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Ian Taylor	CEO	5/20/22	5/26/22
Ryan Kelso	COO	5/20/22	5/24/22
Gretchen Reuwer	Director of Electric Services	5/20/22	5/20/22
Gregory Thomas	Chief Engineer of Electric Services	5/20/22	5/23/22
Justin Green	Electric Operations Manager	5/20/22	5/23/22
Jeffrey Morriss	Substations Manager	5/20/22	5/23/22
Coby Henk	Electric Operations Assistant Manager	5/20/22	5/23/22
Keith Marsh	Electric Ops Superintendent	5/20/22	5/23/22
Larry Boos	Electric Ops Superintendent	5/20/22	5/23/22
Justin Burkhardt	Electric Ops Superintendent	5/20/22	5/23/22
Manuel Estrada	Electric Ops Superintendent	5/20/22	5/23/22
Todd Kelley	Electric Ops Superintendent	5/20/22	5/23/22
Patrick Brawner	Electric Engineer	5/20/22	5/24/22
Nick Haughton	Substation Supervisor	5/20/22	5/23/22
Melissa Krause	Chief Strategic Communications and Security Officer	5/20/22	5/25/22
Billy Shearer	Safety and Security Manager	5/20/22	5/23/22
Pam Quidley	Communications and External Affairs Manager	5/20/22	5/24/22
Dawn Schriewer	Chief Financial Officer	5/20/22	5/21/22
Carlos Salas	Customer Service Manager	5/20/22	5/24/22
Greg Brown	Chief Technology Officer	5/20/22	5/23/22
Justin Stroupe	Systems Control Manager	5/20/22	5/25/22
Jeffrey Jones	Interim Information Technology Manager	5/20/22	5/24/22
Jennifer Cain	Director of Business Planning	5/20/22	5/24/22
Jacob Tschoepe	Fleet Facilities Manager	5/20/22	5/23/22
Tina Rocha	Interim Purchasing Manager	5/20/22	5/23/22

PROJECT NO. 53385

AFFIDAVIT OF NBU CEO
PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF COMAL §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath he or she is entitled to make this Affidavit, and that the statements contained below are true and correct.

I, Ian Taylor, swear or affirm that as a Municipally Owned Utility operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region and control system, confirms the following:

"I am the CEO for the New Braunfels Utilities (NBU), which is a incorporated municipality in the State of Texas.

NBU operates an electric distribution utility system in the State of Texas and the Electric Reliability Council of Texas power region.

The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, has been distributed to NBU Managers and Operations personnel;

NBU Executives and Operations personnel have received training on the updated EOP;

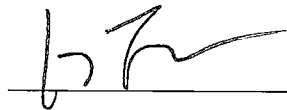
In accordance with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for NBU Operations personnel is scheduled before September 30, 2022.

NBU will notify Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

NBU has distributed the EOP to local Jurisdictions, including regional TDEM personnel and City of New Braunfels and Comal County Emergency Management Coordinators;

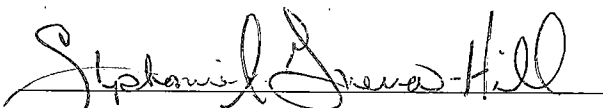
NBU has a Business Continuity Plan related to returning to normal operations after an emergency event or situation;

NBU'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."

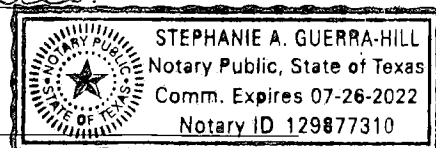


Ian Taylor
CEO
New Braunfels Utilities

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



Notary Public in and for the State of Texas



Notary Seal

PUC Primary and Backup Emergency Contact List

Primary Emergency Contact:	Ryan Kelso
Title:	COO
Email:	rkelso@nbutexas.com
Main Phone:	830.629.8416
Cell Phone:	832.561.1713

Secondary Backup Emergency Contact:	Gretchen Reuwer
Title:	Director of Electric Services and Compliance
Email:	greuwer@nbutexas.com
Main Phone:	830.608.8823
Cell Phone:	830.660.3437