



## Filing Receipt

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**ELECTRIC SYSTEM**  
**§25.53 EMERGENCY OPERATIONS PLAN**  
**EXECUTIVE SUMMARY**

## **Executive Summary**

The City of Cuero (Cuero) 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 Cuero 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.

Cuero 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 Cuero, 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 Cuero's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that Cuero 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 Cuero's senior leadership, this section includes a "Message from the City Manager" that underscores the importance of the plan and encourages all Cuero personnel to learn the plan and work with their respective supervisors and management teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for Cuero 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 15 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 Cuero will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for Cuero, 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, Cuero 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 19 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 Cuero 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 20 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 Cuero 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 Cuero will utilize and addresses potential work schedules for Cuero personnel in significant and major system emergency events.

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

**This section begins on page 22 of the EOP and corresponds to §25.53(d)(5).**

Cuero 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 27 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 Cuero 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 Cuero preparations and actions for ERCOT Emergency Event Alert (EEA) levels and includes details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between Cuero and the Lower Colorado River Authority Transmission Services Corporation (LCRA TSC) which is the Designated ERCOT Transmission Operator (DTO) for Cuero, 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 Cuero procedures for coordination of system restoration with LCRA TSC following a load shed event, and key policies and procedures that Cuero utilizes for restoration from

significant system outage events. The final subsection of this Annex provides information on Cuero'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 38 of the EOP and corresponds to §25.53(e)(1)(C).**

In the Pandemic and Epidemic Annex, Cuero 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 Cuero takes regarding prevention and preparation, employee safety, working remotely, and steps Cuero takes to ensure adherence to policies implemented by state and local agencies.

#### **Wildfire Annex:**

**This section begins on page 41 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 documents Cuero'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 Cuero would take to respond to a wildfire event.

#### **Hurricane Annex:**

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

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

#### **Cyber Security Annex:**

**This section begins on page 44 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 Cuero owned substation facilities, office facilities and electric distribution system. Based on Cuero'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 47 of the EOP and corresponds to §25.53(e)(1)(G).**

The Physical Security Annex provides information regarding the policies and procedures Cuero has implemented to protect Cuero-owned substation, transmission, and distribution facilities, office complexes and other facilities that are critical to the operation of the Cuero electric distribution system. Based on Cuero's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for Cuero'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 Cuero personnel including the date the training was completed by each employee:

Cuero Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Raymond Zella	City Manager	5/16/22	5/20/22
Wayne Berger	Director of Utilities	5/16/22	5/20/22
Ken Lopez	Senior Lineman / Foreman	5/16/22	5/20/22
Brian Ladwig	Senior Lineman	5/16/22	5/20/22
Marcus Escobedo	Senior Lineman	5/16/22	5/20/22
Raul Diaz	Groundman II	5/16/22	5/20/22
Aidan Pompa	Lineman	5/16/22	5/20/22
John Aguilar	Groundman I	5/16/22	5/20/22

**PROJECT NO. 53385**

**AFFIDAVIT OF CITY MANAGER OF  
CITY OF CUERO**

**PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53**

**STATE OF TEXAS §**

**COUNTY OF DEWITT §**

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, Raymond Zella, 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 City Manager for the City of Cuero (CUER), which is an incorporated municipality in the State of Texas.

CUER 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 CUER Managers and Operations personnel;

CUER 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 CUER Operations personnel is scheduled for a date and time in CY2022 before September 30, 2022;

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

CUER has distributed the EOP to local Jurisdictions, including regional TDEM personnel and including DeWitt County Emergency Management Coordinator;

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

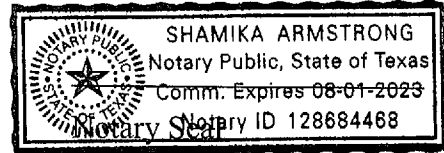
CUER’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

Raymond Zella

Raymond Zella  
City Manager  
City of Cuero

Sworn and subscribed before me on this 16 day of May, 2022.

Shamika Armstrong  
Notary Public in and for the State of Texas



(Must be notarized by a notary public in and for the State of Texas)



## PUC Primary and Backup Emergency Contact List

### Address Information

#### Contact

#### Primary Emergency

**Company:**CUERO ELECTRIC UTILITY  
**Contact:**WAYNE BERGER  
**Title:**DIRECTOR OF UTILITIES

**Main:**(361) 275-6114  
**Toll-Free:**(361) 275-6114  
**Fax:**  
**Home:**  
**Cell:**(361) 243-2041  
**Email:**wberger@cityofcuero.com

#### Contact

#### Secondary Emergency

**Company:**CUERO ELECTRIC UTILITY  
**Contact:**KEN LOPEZ  
**Title:**ELECTRIC SUPERINTENDENT

**Main:**(361) 275-6114  
**Toll-Free:**(361) 275-6114  
**Fax:**  
**Home:**  
**Cell:**(361) 799-9717  
**Email:**klopez@cityofcuero.com

#### Contact

#### Tertiary Emergency

**Company:**CUERO ELECTRIC UTILITY  
**Contact:**RAYMIE ZELLA  
**Title:**CITY MANAGER

**Main:**(361) 275-6114  
**Toll-Free:**(361) 275-6114  
**Fax:**  
**Home:**  
**Cell:**(361) 243-2011  
**Email:**rzella@cityofcuero.com