PURPOSE AND SCOPE

Purpose

Safety is the highest priority at Nacogdoches Generating Facility and overrides any other requirements. The purpose of this procedure is to establish a summer weatherization plan which provides an overview of the actions being undertaken in order to maintain the reliability of the generating facility during the summer season.

This plan is intended to meet and exceed the requirements of ERCOT Nodal Protocols Section 22, which is the declaration of summer weather preparations.

Scope

The Summer Weatherization Plan (SWP) consist of the following protocols implemented through a preventative maintenance process tool and combined with daily operations rounds to document any deficiencies.

SAFETY PRECAUTIONS / LIMITATIONS

i. All Safety and Health procedures shall always be followed.

ii. A thorough Job Safety Briefing (JSB) shall be completed before beginning work.

iii. Employees should always use the proper Personal Protection Equipment (PPE) for the task they are performing.

iv. Personnel must observe standard safety precautions when working around or with high-temperature piping systems.

v. Personnel must be aware that components of this system are maintained in an automatic mode of operation. The equipment may start at any time without warning.

vi. Personnel should remain clear of all rotating machinery, whether operating or in standby, at all times during unit operation.

vii. Rotating machinery must never be placed in service without the appropriate equipment guards in place.

viii. No attempt should be made to bypass or eliminate equipment safety interlocks. Doing so could result in equipment damage and possible injury to plant personnel.

Protocol

1. The plant generates preventative maintenance work orders to address the proper operation or non-operation (summer conditions) of the complete heat trace system.
2. The work order program also generates work orders to inspect and maintain all equipment across each system at the designated interval: weekly, monthly, semi-annual, annual, etc. as recommended by the original equipment manufacturer (OEM).
3. The plant utilizes shift rounds to visually inspect and verify the correct conditions associated with chemical and propane storage. This includes monitoring equipment conditions, both operating and non-operating, and varying storage levels affected by different ambient conditions.
4. The plant continuously monitors the age of the biomass fuel inventory in addition to other measures (ambient temperature, rainfall) turning the pile as needed to prevent the possibility of fire or safety-related issue.
5. In addition, fuel sampling is performed, sent offsite, and evaluated to ensure accurate analysis of fuel quality.

HOT WEATHER PREPAREDNESS

A planning meeting should be scheduled and conducted, well in advance of the summer operating season, to estimate and determine the requirements of the summer months approaching.

1. REVIEW Previous Summer Weather Events.
2. IDENTIFY Inventory needing replenishment.
   a. Drinking water and sports drinks.
   b. Engine coolants for rolling stock and emergency fire pump and generators.
   c. Air horns and port-a-cools.
3. CHECK the following equipment for Proper Operation and Readiness:
   a. Rolling Stock
   b. Emergency Diesel Fire Pump
   c. Emergency Diesel Generator
4. VERIFY emergency phone list is correct.
5. VERIFY 24 hour HVAC support is available.
6. INFORM personnel of special operating limitations and countermeasures.
7. CHECK that Air Conditioning Contractors have serviced all air conditioning units.
8. VERIFY proper first aid supplies are on hand.
9. PERFORM an operational function check of all transformer vent fans.
10. PERFORM an operational function check of all oil cooler fans.
11. ENSURE all plant heat exchangers are clean and in good working order.
12. COMMUNICATE Summer Weatherization Plan responsibilities to appropriate personnel.

PERSONNEL ACTIONS DURING HOT WEATHER EVENT

In the event that extreme hot weather is forecasted the following plan should be initiated.

1. Stage portable cooling equipment and air horns in accessible areas or place in known areas of need.
2. Stage water and sports drinks in coolers throughout work areas. (Elevator, etc.)
3. Personnel will discuss the weather forecast and safety implications at the beginning of each shift.
4. Communicate and implement summer weather advisories.
   a. Note in shift logs that summer weather advisory has been implemented.
   b. Note in shift logs when the summer weather advisory is released.
5. Implement operating controls during extreme summer weather advisories.
   a. Complete critical cooling equipment checklists immediately following the implementation of a summer weather advisory.
   b. Assure adequate staff for readiness implementation.
   c. Impose restriction on maintenance activities during advisories.

CRITICAL COOLING EQUIPMENT CHECKLIST

DATE:	NAME:	AMBIENT TEMP:	
LOCATION	IS UNIT OPERATING CORRECTLY? Y/N	LOCATION	IS UNIT OPERATING CORRECTLY? Y/N
[redacted]			

Emergency Contacts

Plant Contact

- [redacted] [redacted]

Dispatch

- [redacted] [redacted]

Reliability Entities (Reliability Coordinator)

- ERCOT (Control Center) [redacted]

Reliability Entities (Transmission Operator)

- Oncor (Control Center) [redacted]

Federal Bureau of Investigation (FBI) Offices

- Texas (FBI Duty Agent – Austin) [redacted]

If Plant Management cannot make positive contact with any of their first-tier contacts identified in the contact tree, they will call subsequent tiers until appropriate entities are notified.

Previous Weather Events

6.0b. *Water Shortage – PUCT 25.53.(e).(2).(B)*

This plan is designed to provide an action plan that addresses supply shortages of water used in the generation of electricity. The focus of the plan is to ensure generation capability to support grid reliability. In accordance with PUCT 25.53.(e).(2).(B), The loss of cooling tower make up is included in this section.

Approved By:		Date:	

OPERATOR EVENT RESPONSE ACTION

LOSS OF COOLING TOWER MAKE UP

Revision Log

Rev. #	Description	Date of Rev

Table of Contents

2. PURPOSE/FUNCTION

i. This procedure is intended to guide the Operations team through a cooling tower make up water loss event.

ii. This procedure details actions that must be accomplished by either the Control Room Operator or the Outside Operator to maintain the plant in a safe condition and protect equipment.

3. PRECAUTIONS/LIMITATIONS

i. Under no circumstances should operators compromise safety standards.

ii. Any alarms/trips that occur must be responded to immediately and appropriate corrective action taken quickly. Document all abnormal occurrences.

4. GENERAL

i. [redacted]

5. INITIAL CONDITIONS

i. The plant can be in any operating configuration.

6. POTENTIAL CAUSES

i. [redacted]

ii.

iii.

iv.

v.

vi.

vii.

7. AUTOMATIC PLANT RESPONSE

i. [redacted]

ii.

8. OPERATOR ACTIONS

i. [redacted]

ii.

iii.

iv.

v.

Note

[redacted]

vi. [redacted]

vii.

viii.

ix.

x.

xi.

9. PLANT RECOVERY

i. [redacted]

ii.

iii.

10. FOLLOW UP

i. Provide necessary documentation for future reference.

ii. Notify Plant Management that event has been resolved.

6.0c. *Restoration of Service– PUCT 25.53.(e).(2).(C)*

PRIORITIES FOR RECOVERY OF GENERATION CAPACITY

TABLE OF CONTENTS

1. INTRODUCTION

Recognizing that proper preparation and planning are essential to ensure reliability during recovery of electric generation capability following a system-wide outage Nacogdoches Generating Facility has established this Priorities for Recovery of Generation Capacity Plan.

This Emergency Plan shall be followed by Nacogdoches Generating Facility personnel to respond to a plant outage, in conjunction with a system-wide outage

2. PURPOSE

The Priorities for Recovery of Generation Capacity Plan is a plan to guide activities required to prepare for emergency conditions for generation recovery and satisfies the requirements of several outside agencies. The focus is on maintaining facility reliability and preventing prolonged outages.

3. OBJECTIVE

It is the responsibility of Nacogdoches Generating Facility personnel to develop and implement a robust Recovery of Generation Plan to maintain the readiness and reliability of this facility. This plan should be reviewed periodically to incorporate industry best practices and lessons learned for continuous improvement.

4. REFERENCE POLICIES

Substantive Rules Applicable to Electric Service Providers

Nacogdoches Generating Facility Startup Procedure
Nacogdoches Generating Facility Shutdown Procedure

5. PRIORITIES FOR RECOVERY

The Nacogdoches Generating Facility will follow the recovery plan of the local Independent System Operator {ISO) or Regional Entity (RE). The primary focus will be to return the plant to service to support recovery of the grid, according to the needs of the ISO or RE. The information in this procedure will be used to guide the facility recovery actions.

6. PLANT PREPARATORY ACTIONS AND TIMELINE

- [redacted]

In the event of an emergency requiring power plant shutdown, the facility will report immediately to Austin Energy's Qualified Scheduling Entity ("QSE") 24-hour desk, who will in turn notify all appropriate internal and external parties. After declaring an all-clear condition at the location, the facility will follow a comprehensive startup procedure that is unique to the capabilities of each specific power plant.

7. RESOURCES

- [redacted]

- Nacogdoches Generating Facility maintains additional procedures in other sections of this EOP to address operating emergencies. Additional operating procedures for System Operators are maintained in the control room.

8. RECOVERY ACTIONS

A. RESUME normal plant operations as permitted by system restoration. Ensure proper safety requirements are met when restoring operability to systems and their components.

LOSS OF STATION SERVICE

PROCEDURE

Revision Log

Rev. #	Description	Date of Rev

Table of Contents

11. PURPOSE AND SCOPE

i. This procedure is intended to guide the Operation Team in the event Station Service is lost.

ii. This procedure details actions that must be accomplished by either the Control Room Operator and/or the Outside Operator to ensure safe recovery to normal condition or ensure Emergency Generator is supplying necessary power for Critical Equipment to place Steam Turbine on Turning Gear.

12. PRECAUTIONS/LIMITATIONS

i. Under no circumstances should operators compromise safety standards.

ii. Any alarms/trips that occur must be responded to immediately and appropriate corrective action taken quickly. Document all abnormal occurrences.

13. GENERAL

i. [redacted]

ii.

14. INITIAL CONDITIONS

i. [redacted]

ii.

15. AUTOMATIC PLANT RESPONSE

i. [redacted]

16. OPERATOR ACTIONS

1.____
2.____
3.____
4.____
5.____
6.____
7.____
8.____
9.____
10.____

[redacted]

Note

If grid is available proceed to switch power from emergency diesel generator to construction transformer.

11.____
12.____
13.____
14.____
15.____
16.____

[redacted]

17.____ [redacted]

18.____

19.____

20.____

21.____

17. PLANT RECOVERY

i. Isolation of Fault

1. [redacted]
2.
3.
4.
5.

ii. Returning to Normal Operation

1. [redacted]
2.
3.

18. FOLLOW-UP

i. Verify all plant auxiliaries are running.

19. ATTACHMENTS

6.0d. *Pandemic and Epidemic– PUCT 25.53.(e).(2).(D)*

The plan identifies risk assessments for major business functions and recovery strategies for loss of key personnel. Procedures are in place which identify alternate personnel for key business functions and critical employee skills required to sustain operation. In accordance with PUCT 25.53.(e).(2).(D) the Influenza Pandemic Plan is included in this section.

NAES SAFE	SMP-20 Influenza Pandemic Response Plan		
	Rev R3	Issue Date 11 Oct 19	Last Review Date 24 May 2021

TABLE OF CONTENTS

REFERENCES

1. The information in this Pandemic Response Plan was primarily obtained from:
   Center for Infectious Disease Research and Policy, University of Minnesota
   http://www.codrap.umn.edu/
   North American Electric Reliability Council
   http://www.nerc.com
   United States Center for Disease Control
   http://www.cdc.gov/flu/avian/index.htm

2 Other websites with useful pandemic information:
   http://www.pandemicflu.gov/ - U.S. Government Public Information Site

   http://www.who.int/topics/influenza/en/ - World Health Organization Site

   http://www.pandemicflu.gove/plan/businesschecklist.html - DHS site (U.S.)

   http://www.phac-aspc.gc.ca/influenza - Public Health Agency of Canada

SUB-SECTIONS

None

DOCUMENT REVISION HISTORY

Rev	Rev Date	Description of Changes / Comments
R0	11 Oct 19	Issued R0
R1	12 Mar 20	Updated skill set and contact list with new employees
R2	9 Sep 20	Removed Mark Williamson from skill set list
R3	24 May 21	Updated I&C and Op Tech contacts, Updated Operation Supervisor & Plt Manager Contact Info

- **INTRODUCTION**

  The objective of this Safety Manual Procedure is to describe potential pandemic threats, to identify and prioritize the critical operations and business functions of this facility, and to provide appropriate response guidelines. The information in this Plan is based on generally accepted assumptions about the development, outbreak, and expected progress of an influenza pandemic. Site-specific information required for implementing this Plan (contact lists, recovery details, etc) is provided in Appendices A through G at the end of this Procedure. Control and survival of a pandemic will depend on the ability of thoughtful individuals to conduct a well-planned and well organized response. The ultimate objective of this Plan is to prepare those individuals for success.

  - PANDEMIC CHARACTERISTICS

    - Timing and severity of the outbreak of a pandemic are uncertain and may not be immediately recognized. The most feared pandemic strains (such as avian influenza or "bird flu", H5N1) exhibit the following characteristics:

      - Able to cause severe disease in humans
      - Global human population has no pre-existing immunity
      - Able to spread rapidly through human-to-human contact

    - Once human to human transmission begins, the disease will spread very rapidly around the world within three to eight weeks. It is likely that 20 to 30 percent of global population will contract influenza during the first wave and will become very ill for several weeks. Additional waves will follow over one to two weeks.

    - Absentee rates for employees may be in the range of 25 to 60 percent for the duration of the pandemic, due to employee illness and to other factors such as caring for family members. Absentee rates will normally vary across an organization based on location and isolation.

    - With the expected high percentage of ill people, the existing healthcare system will be overwhelmed. Most government and health organizations will not have sufficient stockpiles of anti-viral agents or vaccines to treat those who are exposed or who will become ill if a pandemic occurs in the next one to two years.

    - Persons who contract the virus are not expected to contract it a second time due to a buildup of personal immunity. However, if the virus mutates, recurrences for the same individuals could be possible.

    - Personnel management will need to be modified to continue essential plant operations and business processes, while minimizing the spread of the virus.

- The organizational response will need to include the distribution of accurate and timely information to employees, families, and customers.

- Because of the percentage of affected people around the world, global trade and the global economy will be significantly impacted by the pandemic, limiting the supplies of food and manufactured goods.

- Other cross dependencies with other segments of the utility sector (generators, transmission operators, distribution providers) and other critical infrastructure (communications, nuclear, natural gas, petroleum, transportation, emergency services, etc) as well as contractors and suppliers will be severely tested during influenza pandemic.

- PANDEMIC PHASES

Information developed by the World Health Organization (WHO) defines five phases of a possible pandemic as listed below. These five phases provide a useful framework for pandemic response planning.

- Phase 1 -- Pandemic Alert

  Governments, owners, and operators are notified that a pandemic is possible and preparedness plans should be reviewed and updated.

- Phase 2 -- Pre-Pandemic

  Localized outbreaks are occurring with human-to-human transmission. Governments and electricity sector entities begin to assign resources, prepare staffing, and implement contingency plans. Begin an information distribution program to promote appropriate responses by employees.

- Phase 3 -- Pandemic Outbreak

  General outbreaks across borders and continents. Organizations implement response plans.

- Phase 4 -- Maximum Disruption

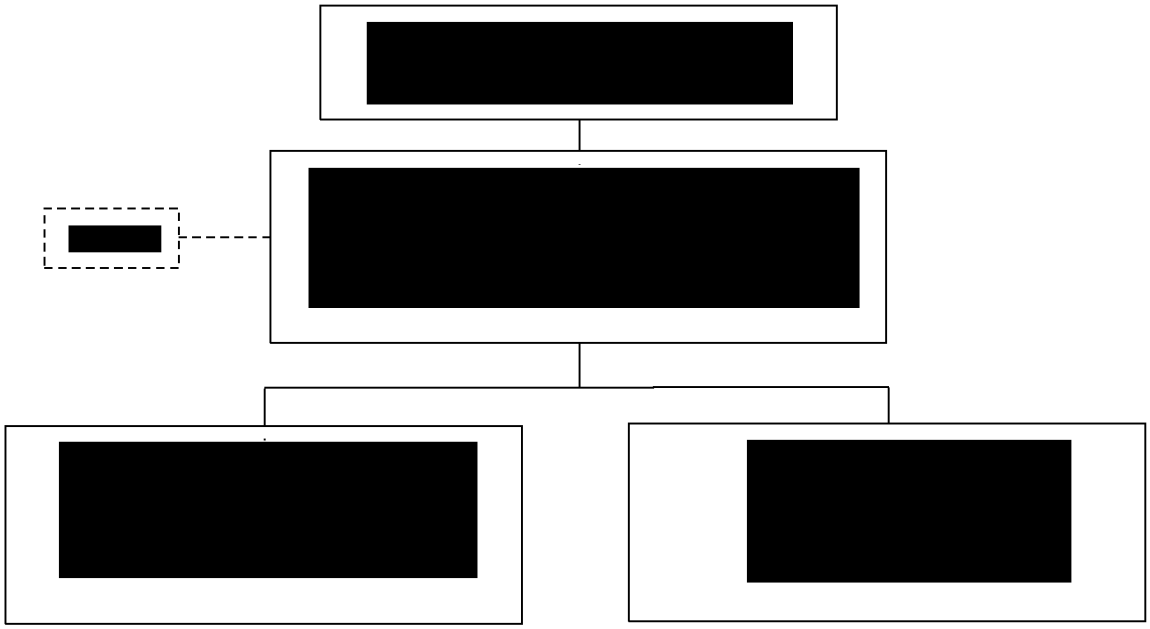
  High absentee rates occur, and fatalities begin to impact the workforce. This phase could last for several months.

- Phase 5 -- Prolonged Recovery

  Recovery will be slow, and the underlying economy will weaken. Altered business conditions will be prevalent for large and small firms. This phase will last for at least three months and possibly up to six months.

- **PLANNING RESPONSIBILITIES**

  The diagram below is the organization chart for the NAES Pandemic Management Program Team (PMPT) for this facility. The PMPT task force is responsible for the preparation, the continuing readiness, and (if needed) the implementation of this Plan.



  - CORPORATE RESPONSIBILITIES
    - Plan Development
      - Recognize threat and authorize a planning and response effort
      - Identify critical departments needing response plans
      - Require preparation of approved Pandemic Response Plans
      - Provide schedule for preparation of Plans
      - Request draft policy changes needed for pandemic management
      - Adjust strategy and response level as needed
    - PMPT Inputs
      - Pandemic threat and impact information
      - Program coordination
      - Initiation criteria
      - Threat monitoring updates

- Department pandemic management plan templates and coaching
- Coordination with support departments (Human Resources, Information Services, etc)

- NAES Headquarters Inputs
  - General pandemic information (issues, impacts, mitigation strategies, pandemic management, suggested plan outline)
  - Guidance and coaching
  - Plan templates
  - Family care outline and websites
- Plant Staff Responsibilities
  - Brainstorm critical business functions and priorities
  - Determine locally appropriate mitigations
  - Prepare and test draft Pandemic Response Plans
  - Assist employees with family care plans
  - Manage work continuation if a pandemic strikes
  - If NAES corporate management is not available, plant managers shall take control

- EMPLOYEE RESPONSIBILITIES
  - Perform critical department work if a pandemic strikes
  - If management is not available, senior personnel will provide leadership
  - Remain individually healthy by following guidelines
  - Review family care outlines and websites; prepare a family response plan and discuss with family members
  - Stockpile essential supplies

- **PANDEMIC RESPONSE PLAN DEVELOPMENT**

  This section will provide guidelines for corporate departmental planning to meet the challenges of an influenza pandemic. Various charts and tables are provided throughout this section for planners to use during these assessment processes.

- BUSINESS PROCESSES ASSESSMENT

  In planning for a potential Pandemic, it is important to identify the major business processes in the organization. It is also important to determine the critical inputs that are needed to accomplish those processes. Other departments in the company may depend on some of your organization's output to do their work. The most important outputs should also be defined.

  As you identify critical inputs and outputs, consult with upstream and downstream organizations. They may have priorities that are different from your own and negotiation with them may be necessary. Critical information should include Contact Lists, Vendor Lists, etc. To set the Priority Ranking, #1 is for most important, and #5 is for least. For example, the critical business functions needed for the business to survive should be in the #1 category.

  The following "Major Business Functions" assessment chart is recommended as a starting point for the NAES Pandemic Management process. Several follow-up assessment charts are shown on the ensuing pages.

Major Business Functions

Major Business Processes	Priority Ranking	Critical Inputs and Outputs
[redacted]		

- PANDEMIC RISKS ASSESSMENT

  Once the major business processes have been identified, it will be important to determine what the largest risks to those functions are. What problems would be caused by loss of key staff inside or outside of the company (loss of key department personnel, loss of vendors, bankruptcy of a large customer, stock market crash, late or no payments, inability to communicate with other businesses, failure of service providers, etc. Once these largest risks are determined, appropriate mitigation strategies can be established.

Largest Risks

Major Business Processes	Largest Risk (Internal & External)	Priority of Risk
[redacted]		

Major Business Processes	Largest Risk (Internal & External)	Priority of Risk
[redacted]		

- LOSS OF KEY PERSONNEL

  - For Influenza Pandemic Only

    This case differs from the normal Business Continuity case because all the supporting departments and vendors that the department might call upon in an emergency will also be having a personnel shortage. This means many more vendors will be needed, more work must be cancelled or postponed, and more drastic measures to protect the remaining employees must be taken.

Recovery Strategies

• Major Business Processes	• Recovery Strategies
[redacted]	

  - For Influenza Pandemic with Emergency Succession

    In the following table, identify key persons doing critical work for each major business function. These key people are those persons without whom, the Major Business Function could not be done. This might be a senior department employee, group leader or supervisor.

    After naming the current key personnel, enter the name(s) of the person(s) that could take over the work in an emergency where the current key person is not available. In other words, this table is an emergency succession plan for the work that is most important to the company.

Key Personnel and Critical Functions

Major Business Processes	Key Person(s) & Emergency Alternate(s) for Organizational Assignments
[redacted]	

Major Business Processes	Key Person(s) & Emergency Alternate(s) for Organizational Assignments
[redacted]	

- EMPLOYEE CRITICAL SKILLS INVENTORY

  Use the table below to list your personnel who have skills in high demand critical areas that could fill in for others in an emergency. The table lists some typical skill sets for plant operations but should be modified as needed for the skill set categories that suit your department's needs.

Critical Skills Inventory

List of Employee Names	Critical Skill Sets						
	CRO	APO	Mechanical Skills	Electrical Skills	Plant DCS	Other PLC	Warehouse
[redacted]							

Critical Skill Inventory

- INFORMATION SYSTEMS (IS) INVENTORY
  - Critical Systems

    Use the table below to list the critical Information Systems and IS Applications which are essential to the most important work done in the department. The following acronyms used in this table are defined as:

    - RTO (Recovery Time Objective) - The period of time within which systems, applications, or functions must be recovered after an outage.
    - WRT (Work Recovery Time) - The period of time needed to complete the disrupted work on a recovered/repaired resource in order to return it to normal operational status.

Work Recovery Time

Critical Business Functions	Critical Business Processes	Critical IT Systems and Applications	RTO	WRT
[redacted]				

  - Loss of Software, Hardware or Data Assets

    Use the table below to help list hardware loss strategy. In the event that your critical IT Systems and Applications are not available, what is your strategy to continue work? Would you use a simple Excel spreadsheet to record and manipulate data until the main application was restored? Would you use another application that could do some of the important functions? Is there an old or newer program that would work? Would you cease work? Are there any other relevant questions?

Information Systems (IS) Recovery Strategies

Major Business Functions	Loss of Systems	Emergency Software Recovery Strategies
[redacted]		

  - Recovery of Lost Software, Hardware, or Data Assets

Assume that the loss of Software, Hardware or Data Assets scenario has occurred and the recovery team has been activated. The general strategy from the previous sections applies but more detail is needed to describe the steps that would be taken.

In the following table, replace the example by listing the detailed tasks that must be initiated and indicating which member(s) of the recovery team (e.g., team leader, team member, or names of individuals) will perform it.

Detailed current backups of the following software and systems are maintained on file in a fireproof cabinet in an area separate from the main control area:

Detailed IS Recovery Strategies

Major Equipment	Contact
N/A	

- Pandemic Plan Validation

  Identify the known gaps, issues and problems with this Pandemic Plan that would make it difficult to succeed, contribute to its failure or make the recovery from a significant event slower and less efficient. Identify the expected time frame to eliminate these problem areas. If an economic, time related, organizational or technical issue is causing the gap, include the description of this cause. Describe the gaps in order of importance, with the most important one listed first.

- Qualified CROs

  - Long term action is to get APOs sufficiently trained and qualified to fill in as CROs.

  - Cross training of plant personnel is required for better flexibility.

- Limited Vendor Resources

  - Resources critically tied to interstate transportation. These include lime, soda ash, hydrogen, caustic, acid, and ammonia.

  - Some staff may not be from the local area. This makes alternate transportation more difficult and timely relief for ill personnel may not be readily available.

- **THREAT MITIGATION - GENERAL GUIDELINES**

The purpose of a Pandemic Management Program is to assist NAES plant management in preparing for a potential pandemic by developing plans to manage the

threat. The actions listed below could be taken by all departments to help them minimize the impact if the pandemic threat becomes real.

- Review existing emergency plans. Update these and inform essential personnel.
- Update the contact list of all employees in your department. Include after-hours contact number(s); some of these phone numbers may be out of this region, such as parents, or other family members or friends.
- Identify employees and key customers with special needs and incorporate the requirements of such persons into your preparedness plan.
- Consider the impact of community containment measures and quarantines, school and/or business closures, and public and financial institution closures.
- Expand the use of teleconferencing and videoconferencing to limit the frequency of meetings and other types of face-to-face contact.
- Implement guidelines to modify the frequency and type of face-to-face contact (e.g. handshaking, seating in meetings, shared workstations) among employees and between employees and customers.
- Train and prepare ancillary workforce (e.g. contractors, employees in other jobs or other departments, retirees, etc).
- Develop cross training programs to assure adequate staffing of essential functions; consider strategies such as developing "job sheets" that outline key activities by position.
- Consider a transportation plan in case of fuel shortages and loss of public transportation.
- Develop a plan to send home non-critical staff and shift workers to home offices or other sites or change work hours that would minimize exposure risks, address potential fuel shortages, and curtail dependence on public transportation.
- If services are contracted to outside organizations, contact vendors and find what type of contingency plans they may have in place.
- Consider the impact of a disruption of social systems and services on your organization (assume the possibility of no response or slow response from emergency first responders, other basic services not available, etc.)

- **MITIGATION STRATEGIES**

There are several possible risks and mitigations to be considered when planning your strategies. Appendix A contains a listing of the most common risks and the associated mitigations. Each specific facility or department may have more or different risks than those listed in Appendix A.

- Protect Work Force
    - Protect the workers that you have.
    - Provide the personal protective equipment that may be needed.
    - Minimize meetings and face to face contact.
    - Wherever possible, get priority medical treatment arranged.
    - Provide essential medical training for on-site emergencies.
    - Gather essential health and protective equipment.
    - Gather the contact phone numbers for your employees and their "out of area" contact numbers.
    - Be prepared to have an alternative way to transport essential employees to work or locations where they can work.
    - Consider the impact of civil unrest and a breakdown in social order if police, fire and other personnel are not available. How will your protect your work site and employees?
    - Should you be prepared for some employees to live on the work site for several days or weeks?
- Help Employees Protect Their Families
    - Provide information so employees can protect their families and can feel free to work.
    - Provided the personal protective equipment that may be needed.
    - Counsel employees that need help coping with illness or losses.
- Augment the Work Force
    - Broaden the vendor base in type and geographic area.
    - Gather the contact phone numbers for your vendors and their after-hours contact numbers.
    - Ask that your most critical vendors also have and carry out Pandemic Planning and Mitigation.
    - Ask to see their plans and be briefed on them.
    - Identify groups of additional workers from other departments, retirees, employment agencies, etc. The lists should be long and geographically diverse.

- Protect Work Processes
    - Be prepared to alter your work process and use alternative methods. Your normal software may become disabled due to routine failure and there may not be personnel to get it repaired. Your software or application recovery may not be on a high priority list.
    - Cross train your personnel to be more generalists rather than specialists so they can support and stand in for each other.
    - Is it possible for vendors to help with more routine work or to outsource the some of the work?
    - Buy, write or update procedure or instruction manuals so that a broader segment of the department could do the work. Train the work force on these procedures.
    - Maintain essential data on backup CD-ROMs or other sources. Make sure several people know how to access this data.
    - Move some processes away from "just in time" methods. The "just in time" processes might collapse when critical materials or data are not available. Some stockpiling or source diversification may be necessary.
    - How will you work if the city or state is broken up into quarantined areas?
    - Have a current and workable succession plan.
- Stockpile Resources
    - Stockpile critical materials (parts, supplies, protective equipment, routine but necessary supplies, fuel, etc.)
    - Consider alternative transportation methods to get workers to and from work.
    - Consider storing bottled water, canned goods, and emergency meals. Include flashlights, batteries, radios, masks, disposable gloves, soaps and disinfectants.
- Reduce Non-essential Work
    - Each department should identify its most critical business functions and the overall mitigation strategies for them. Determine what lower priority work to cut.
    - Each department should determine its essential inputs needed for its work and the critical outputs that others need for their work.

- Reduce work to the most important tasks.
- Reduce personal contact and make essential contact safer.
- Have people work from home where possible.
- Reduce or “sanitize” customer contact.
- Teach proper hand washing, use of sanitizing wipes, use of disinfectant soaps, proper use of effective masks and gloves and other personal protective measures.
- Teach people how to handle potentially contaminated material from other people.

- Develop Communication Plans
  - What are the essential information data and messages that need to reach employees, vendors, their families, customers and the public.
  - What is the structure of these messages, what is the likely content that is needed?
  - Develop specific, honest, timely and helpful messages that give the whole, unvarnished truth. Have these messages available and ready to fill in the blanks.
  - Have enough people to do the information gathering and to do the communication.
  - Test the messages on people outside of the communications department. Are the messages clear and do they give the intended information?
  - What alternative ways will the company use to communicate if normal services are not available? Can Webcasts, internet sites, phone recordings, or other sources be of help?

Matrix of Major Risks and Mitigations

Description of Major Risks/Problems	Recommended Mitigation Options
[redacted]	

Description of Major Risks/Problems	Recommended Mitigation Options
[redacted]	

Critical Equipment and Materials

Equipment & Materials	Intended Users	Needed Upgrades or Special Features	Equipment Supplier	Recovery Quantity	Rebuild Quantity
[redacted]					
COMMENTS:					

Vital Records Access and Storage

- **Media Types: E – Electronic, P – Paper, M – Microfilm/fiche**

Key Business Process	Associated Vital Records Required for Process	Media Type (E/P/M)	Vital Record Storage Locations and Access
[redacted]			
COMMENTS:			

Plant-Specific Manuals and Procedural Instructions

- **Media Types: E – Electronic, P – Paper, M – Microfilm/fiche**

Title of Manual or Procedure	Description	Storage Location	Media Type (E/P/M)	Quantity Available
[redacted]				
COMMENTS:				

Employee Contact List

Name	Radio	Position	Ext	Email	Cell
Management					
[redacted]					

Name	Radio	Position	Ext	Email	Cell
[redacted]					

Emergency Contacts List

Organization	Emergency Telephone	Business Telephone	Street Address or Website	Comments
• **PUBLIC SAFETY SERVICES**				
Local/City Fire Department	911			Available 24 x 7
Local/City Police Department	911			Available 24 x 7
County Sheriff's Office	911			Available 24 x 7
State Police Office	911			Available 24 x 7
Local Emergency Operations Center				Available 24 x 7
American Red Cross	(800) 733-2761		http://www.redcross.org/	Available 24 x 7
National Poison Control Center	(800) 222-1222			Available 24 x 7
Local Hospital Emergency Room				
Local Hospital Emergency Room				
• **EMERGENCY BUSINESS SERVICES**				
[redacted]				

Emergency Information Resources

Organization	Emergency Telephone	Business Telephone	Street Address or Website	Comment
[redacted]				

6.0e. *Hurricane– PUCT 25.53.(e).(2).(E)*

Hurricane Action Plan

Revision	Description	Revised by	Reviewed by	Approved by	Date

CONTENTS

1.0 PURPOSE AND SCOPE

1.1 Purpose

The hurricane action plan is to be used as a guideline to prepare Power facilities for hurricane or near-hurricane conditions. These guidelines are not intended to cover all possible specific problems that may arise. Although some basic procedures must be followed, it is up to the operator to familiarize him or her with the characteristics of this guideline. Because conditions may develop that will require diverging from these guidelines, plant management must use sound judgment in all phases of operation during hurricane or near-hurricane conditions.

1.2 Scope

This guideline applies at all Power facilities, employees, and supplemental staff.

2.0 DEFINITIONS AND REFERENCES

2.1 Definitions

hurricane warning – an announcement that sustained winds of 74 mph or higher are expected in a specified coastal area within 24 hours.

hurricane watch – an announcement that hurricane conditions pose a possible threat to a specified coastal area within 36 hours.

2.2 References

None.

3.0 RESPONSIBILITY

3.1 Plant Manager

The plant manager has primary responsibility for implementation and direction of the hurricane response and will coordinate communication between Power and other appropriate parties.

3.2 Management Team

When instructed by the plant manager, the management team will implement the hurricane action plan.

4.0 HURRICANE PLAN

The hurricane action plan is to be used as an operating guideline to help prepare for hurricane and near-hurricane conditions. Plant management should continuously monitor a storm's location, strength, and possible landfall location.

4.1 Hurricane Watch

Emergency authorities may issue a hurricane watch 36 to 48 hours in advance of anticipated landfall. If a hurricane watch may be declared during normal off-duty working hours such as holidays or weekends, the plant manager will review the hurricane action plan and initiate procedures that will facilitate an orderly transition to the hurricane watch status when it is declared.

4.1.1 Initial Preparations

The following table presents detailed activities that should be completed during the hurricane watch phase. The party typically responsible for the action is also presented; however, the plant manager or designee may assign the responsibility to another party as needed.

Action	Responsible party	Completed (initials)
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	
[redacted]	[redacted]	

Action	Responsible party	Completed (initials)
[redacted]		
[redacted]	[redacted]	

Action	Responsible party	Completed (initials)
[redacted]		

Action	Responsible party	Completed (initials)
[redacted]		

4.1.2 Sustained Winds of 35 mph or Greater

During a hurricane watch, when sustained winds reach 35 mi/h or greater for a significant period of time, take the following actions:

Action	Responsible party	Completed (initials)
[redacted]		

4.2 Hurricane Warning

Although emergency authorities try to give more warning, they may issue a hurricane warning less than 24 hours prior to the hurricane's landfall.

4.2.1 Final Preparations

When authorities issue a hurricane warning, ensure the actions detailed below are completed 24 hours before the expected arrival of hurricane force winds. For storms rated category 3 or higher, see 4.3.2, Category 3 or Higher.

Action	Responsible	Completed (initials)
[redacted]		

Action	Responsible party	Completed (initials)
[redacted]		

4.2.1.1 Safe Parking

The keys shall be left in all parked company vehicles to ensure accessibility when needed. The safe parking is designated as the following:

Vehicle	Location	Responsibility
Pickup trucks	Parked at the warehouse or in shop area	Operations team leader
Small trailers	Parked in the warehouse	Operations team leader
Employee vehicles	Employees may park their vehicles in other areas of the facility as directed by plant management.	

4.3 Hurricane

See attachment B, Hurricane Categories, for wind speed and typical damage.

4.3.1 Category 1 and 2 Storms

1. During category 1 and 2 hurricanes, plant loads will be adjusted as directed by the load dispatcher. If the system sustains damage, the units may be shut down if deemed appropriate by the plant manager to ensure personnel safety and to protect the facility.

2. Operations will proceed as required to protect plant equipment from damage.

3. In the event of loss of all communications, plants will operate as previously agreed with the load dispatchers.

4. All doors should remain unlocked to allow access in an emergency.

5. The administration building is not rated for winds greater than 110 mi/h. Plant employees should be evacuated to a safe refuge area prior to 110 mi/h winds.

4.3.2 Category 3 or Higher Storms

In the event of a hurricane rated category 3 or higher, the units may be shut down if deemed appropriate by the plant manager to ensure personnel safety and to protect the facility.

4.4 Hurricane Recovery

1. After storm passage, assess damage to plant and equipment as quickly as possible, and report to Power and joint owner management. Estimates of repair requirements and assistance beyond the capabilities of plant personnel shall be a part of this report.

2. Advise the load dispatchers concerning the availability of units and estimated availability of damaged units.

3. Units will be loaded as directed as system recovery proceeds.

5.0 KEY CONTACT

EMERGENCY NOTIFICATIONS

[redacted]

Emergency Phone Numbers
911 From any Plant Phone

[redacted]

6.0 QUALITY RECORDS

None.

7.0 ATTACHMENTS

Attachment A, Hurricane Supplies.
Attachment B, Hurricane Categories.
Attachment C, Hurricane Team.

Attachment A - Hurricane Supplies

The following table presents a list of suggested supplies to be kept on site for distribution in the hurricane warning stage.

Material	Quantity
[redacted]	

The supplies should remain boxed, separated, and labeled as to contents and the area the supplies are to be issued. All materials unused should be returned after the hurricane danger has passed.

Attachment B - Hurricane Categories

Category	Wind Speed	Damage
Category 1	74 to 95 mi/h	No real damage to building structures. Damage primarily to unanchored mobile homes, shrubbery, and trees. Also, some coastal flooding and minor pier damage.
Category 2	96 to 110 mi/h	Some roofing material, door, and window damage. Considerable damage to vegetation, mobile homes, etc. Flooding damages piers, and small craft in unprotected moorings may break their moorings.
Category 3	110 to 130 mi/h	Some structural damage to small residences and utility buildings, with a minor amount of curtainwall failures. Mobile homes are destroyed. Flooding near the coast destroys smaller structures

		with larger structures damaged by floating debris. Terrain may be flooded well inland.
Category 4	131 to 155 mi/h	More extensive curtain wall failures with some complete roof structure failure on small residences. Major erosion of beach areas. Terrain may be flooded well inland.
Category 5	155+ mi/h	Complete roof failure on many residences and industrial buildings. Some complete building failures with small utility buildings blown over or away. Flooding causes major damage to lower floors of all structures near the shoreline. Massive evacuation of residential areas may be required.

Attachment C - Hurricane Team

The following table is a list of suggested plant staffing during a hurricane.

Hurricane Team	
Department	**Suggested personnel**
[redacted]	

6.0f. Cyber Security– PUCT 25.53.(e).(2).(F)

In accordance with PUCT 25.53.(e).(2).(F) the Cyber Security Policy is included in this section.

RCP-NERC-CIP-003-ATT-A
NACOGDOCHES GENERATING FACILITY - CUSHING, TX

Referencing Documents:	Revision: Rev 2
NERC-RCP-CIP-003 R1.2	Revision Date: September 11, 2021

CYBER SECURITY POLICY

1. INTRODUCTION

A. PURPOSE

The purpose of this document is to specify consistent and sustainable security policies that establish responsibility and accountability to protect [redacted]

B. SCOPE

CIP-003 R1.2 applies to Nacogdoches Generating Facility as an entity with Low Impact BES Cyber Systems which may have External Routable Connectivity and Electronic Access Point Cyber Assets. [redacted]

C. DEFINITIONS AND DEFINED TERMS

Capitalized terms included in this policy statement are defined in the NERC *Glossary of Terms Used in NERC Reliability Standards*, which is periodically updated, or are listed below in this section as Nacogdoches Generating Facility specific terms. The most current version of the Glossary can be accessed by clicking the following link:

http://www.nerc.com/pa/Stand/Glossary of Terms/Glossary_of_Terms.pdf

2. POLICY STATEMENTS

A. GENERAL

Low Impact BES Cyber Security configurations, plans, programs, processes and procedures shall comply with all existing policies and standards as well as the NERC Reliability Standards CIP-002 & CIP-003 (i.e. "the Standards"). Where there is a conflict, the NERC Reliability Standards shall prevail.

shall have a documented "CIP Senior Manager" responsible for ensuring the organization is meeting the requirements of the Standards and of this Policy. The CIP Senior Manager shall be appointed in accordance with CIP-003 R3.

Where reviews and approvals are required, the CIP Senior Manager or delegate(s) shall determine the appropriate level of management if not specified in the Standards.

B. VIOLATION OF POLICY

[redacted]

C. CYBER SECURITY AWARENESS (ATT 1, SECTION 1)

Cyber Security practices shall be reinforced at least once every 15 calendar months (which may include associated physical security practices). Reinforcement may occur through direct or indirect communications such as emails, system wide publications, intranet postings and at various meetings and training modules. The evidence could be documentation through one or more of the following methods:

1. Direct communications (for example, e-mails, memos, or computer-based training);

2. Indirect communications (for example, posters, intranet, or brochures); or

3. Management support and reinforcement (for example, presentations or meetings).

Nacogdoches Generating Facility shall ensure that any employee, contractor, or vendor, who has a need for physical and/or electronic access to a Low Impact BES Cyber System be subject to the Cyber Security Awareness Program.

D. PHYSICAL SECURITY CONTROLS (ATT 1, SECTION 2)

[redacted]

E. ELECTRONIC ACCESS CONTROLS (ATT 1, SECTION 3)

[redacted]

1. [redacted]

2. [redacted]

3. not used for time-sensitive protection or control functions between intelligent electronic devices (e.g., communications using protocol IEC TR-61850-90-5 R-GOOSE).

F. CYBER SECURITY INCIDENT RESPONSE (ATT 1, SECTION 4)

shall have one or more Cyber Security Incident response plan(s), either by asset or group of assets, which shall include:

1. Identification, classification, and response to Cyber Security Incidents;

2. Determination of whether an identified Cyber Security Incident is a Reportable Cyber Security Incident and subsequent notification to the Electricity Information Sharing and Analysis Center (E-ISAC), unless prohibited by law;

3. Identification of the roles and responsibilities for Cyber Security Incident response by groups or individuals;

4. Incident handling for Cyber Security Incidents;

5. Testing the Cyber Security Incident response plan(s) at least once every 36 calendar months by:

   a. responding to an actual Reportable Cyber Security Incident;

   b. using a drill or tabletop exercise of a Reportable Cyber Security Incident; or

   c. using an operational exercise of a Reportable Cyber Security Incident; and

6. Updating the Cyber Security Incident response plan(s), if needed, within 180 calendar days after completion of a Cyber Security Incident response plan(s) test or actual Reportable Cyber Security Incident. shall invoke its Cyber Security Incident Response Plan to rapidly detect incidents to minimize loss and destruction, mitigate exploited weaknesses, restore

computing services, and identify and report Cyber Security Incidents to the Electricity Information Sharing and Analysis Center (E-ISAC), unless prohibited by law.

G. TRANSIENT CYBER ASSET AND REMOVABLE MEDIA (SECTION 5)

shall maintain processes for appropriate use of Transient Cyber Assets (TCAs) and Removable Media to prevent unauthorized access or malware propagation to BCSs; and prevent unauthorized access to BCS Information.

All TCAs managed by shall require use and documentation of one or more of the following safeguards in an ongoing or on-demand manner per TCA capability:

1. Antivirus software, including manual or managed updates of signatures or patterns.

2. Application whitelisting; or

3. Other method(s) to mitigate the introduction of malicious code.

All TCAs **not** managed by shall use of one or more of the following safeguards which must be documented and reviewed by the System Administrator prior to allowing connection of the TCA to a BCS:

1. Antivirus update level.

2. Antivirus update process used.

3. Application whitelisting.

4. Use of live operating system and software executable only from read-only media.

5. System hardening used.

6. Other method(s) to mitigate the introduction of malicious code.

3.

shall require documentation and use of method(s) to detect malicious code on Removable Media using a Cyber Asset other than a BCS; and documentation and mitigation of the threat of detected malicious code on the Removable Media prior to connecting Removable Media to a BES Cyber System.

A. DECLARING AND RESPONDING TO CIP EXCEPTIONAL CIRCUMSTANCES

CIP Senior Manager or delegate shall have the authority to declare CIP Exceptional Circumstances when it cannot conform to this Policy.

shall document an explanation as to why the exception is necessary and any compensating measures authorized by the CIP Senior Manager or delegate.

4. REVIEW

This policy shall be updated as needed or when the Standards addressed by this policy are modified.

5. POLICY RESPONSIBILITY

Latest Revision Approval:

Written By: NAES Corp Date: 2/15/2019

Approved By: William White Date: September 11, 2021

REVISION HISTORY LOG RCP-NERC-CIP-003-ATT-A				
Rev.	Date	Description	By Initials	Approval Initials
0	June 17, 2019	Revised to make policy statements supportive of CIP-003-7 implementation.	MJS	JNB
1	3/1/2020	Updated for 15-Month Review and Approval	NAES	JNB
2	9/11/2021	Updated for 15-Month Review and Approval	NAES	WEW
3				

6.0g. *Physical Security Incident– PUCT 25.53.(e).(2).(G)*

In accordance with PUCT 25.53.(e).(2).(G) the Physical Security Controls is included in this section.

RCP-NERC-CIP-003-ATT-C NACOGDOCHES GENERATING FACILITY - CUSHING, TX	
Referencing Documents: **RCP-NERC-CIP-003 R2**	**Revision: Rev 0** **Revision Date: June 17, 2019**

PHYSICAL SECURITY CONTROLS

11. INTRODUCTION

A. PURPOSE

This document defines Nacogdoches Generating Facility's Physical Security Controls program. [redacted]

B. SCOPE

[redacted]

C. DEFINED TERMS

Capitalized terms included in this policy statement are defined in the NERC Glossary of Terms Used in NERC Reliability Standards, which is periodically updated, or are listed below in this section as Nacogdoches Generating Facility specific terms. The most current version of the Glossary can be accessed by clicking the following link:

http://www.nerc.com/pa/Stand/Glossary of Terms/Glossary_of_Terms.pdf

12. CONTROLLING PHYSICAL ACCESS

[redacted]

A. PHYSICAL ACCESS CONTROLS & MONITORING

[redacted]

1. [redacted]
2. [redacted]
3. [redacted]
4. [redacted]

[redacted]

1. [redacted]
2.
3.
4.

B. PROCEDURES FOR GRANTING AND REVOKING PHYSICAL ACCESS

Granting Access

[redacted]

Identified Roles Requiring Access:

1. [redacted]
2.
3.
4.
5.
6.
7.

Temporary Access

Other positions as dictated by plant needs may include:

1. [redacted]
2.

Revoking Access

[redacted]

All access shall be revoked as soon as practical when it is determined that access is no longer required. Possible methods to remove access include:

1. [redacted]
2.
3.
4.

13. INTERNAL CONTROLS/EVIDENCE

has implemented the following, additional physical security controls:

Quarterly reviews and documentation to validate business need, and employee status of:

- [redacted]
-

Other routine reviews or controls:

- [redacted]
-
-

14. REVIEWS AND UPDATES

This program shall be reviewed and updated as needed and upon the approval of any new versions of the CIP Standards.

15. PROGRAM RESPONSIBILITY

[redacted]

Latest Revision Approval: (Revision History)

Written By: NAES Corp Date: 2/15/2019

Approved By: Joseph Bennett Date: June 17, 2019

REVISION HISTORY LOG RCP-NERC-CIP-003-ATT-C				
Rev.	**Date**	**Description**	**By Initials**	**Approval Initials**
0	June 17, 2019	Updated for CIP-003-7 and added Internal Controls Section	MJS	JNB
1				
2				
3				

6.0h. *Communication– PUCT 25.53.(e).(2).(H)*

In accordance with PUCT 25.53.(e).(2).(H) the Communications Policy and the Community Relations Policy is included in this section.

NAES	ADMINISTRATIVE MANUAL	
Number: **AMP-102**	Subject: **Communications**	
Approved for use by:	Current Issue: **R0**	Date: **17 Oct 19**
Page 1 of 146	**Prepared by NAES Corporation**	

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TABLES

None

EXHIBITS

None

DOCUMENT REVISION HISTORY

Rev	Rev Date	Description of Changes / Comments
D1	13 Jun 19	Issued for plant review.
R0	17 Oct 19	Issued R0

16. PURPOSE

The purpose of this procedure is to provide guidance on the proper means of communications within the plant and between the plant and outside organizations and to ensure that any release of corporate information is properly authorized and accurate.

17. COMMUNICATIONS WITH OUTSIDE ORGANIZATIONS

All written communications between the plant and outside organizations shall be routed through the Plant Manager. This is important to ensure that the Plant Manager is kept aware of all business concerning the plant and to prevent plant personnel from initiating actions independent of plant management involvement.

The Plant Manager can authorize other personnel to act as the point of contact for particular organizations.

The point of contact for official communication to the Plant Owner's Representative is the Plant Manager or designee.

Any form of publicity or statement to the media made by NAES personnel shall be approved by both the Plant Owner's Representative and the Plant Manager.

18. COMMUNICATIONS WITH HEADQUARTERS

[redacted]

19. COMPANY RECORDS/COMMUNICATION GUIDELINES

Accurate and reliable records are of critical importance in meeting legal, financial, and management obligations of the Company. Continual care is required by all employees to insure the correctness, appropriateness, and honesty of all internal and external records, reports and correspondence.

A. [redacted]

B.

C.

D.

E.

20. RELEASE OF CORPORATE INFORMATION

A.

B.

C.

D.

[redacted]

21. COMMUNICATIONS AMONG PLANT EMPLOYEES

[redacted]

22. INCOMING MAIL

All mail addressed to the site will be opened and forwarded to the appropriate personnel. This policy is in accordance with Federal Regulations. All employees are responsible for ensuring that they do not solicit mail of a personal nature. Mail received that is obviously personal in nature will not be opened.

23. TELEPHONE USAGE

The use of the phone for personal matters should be minimized. All personal calls should be made as brief as possible. Outgoing long distance personal calls may be billed to the employee placing the call. All employees must keep in mind that the priorities for use of the plant phones are as follows: 1) Emergencies, 2) Plant Business and 3) Personal Use.

24. ELECTRONIC MEDIA

This sets forth the Company's policy on access to and disclosure of electronic mail messages sent or received by Company employees who use the electronic mail systems and on the proper use of electronic media systems in general. This policy may be changed at any time.

The electronic mail and other electronic media or information systems of the Company, both internal and external (including, but not limited to, the Internet, Intranets and e-mail), are not to be used in a way that may be disruptive, offensive to others, derogatory in nature, defamatory toward any person or harmful to morale.

Display or transmission of sexually explicit images, messages, or cartoons, or any transmission or use of e-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, or religious or political beliefs is prohibited.

It is the employee's responsibility to avoid infringing on the use of copyrighted or otherwise proprietary information. Misuse of Company resources to "hack" or cause damage to other networks, including the Company's system, is strictly prohibited.

25. U.S. MAIL AND MESSENGER SERVICE

Not for personal use.

26. OFFICE EQUIPMENT USE

Business Only.

NAES	ADMINISTRATIVE MANUAL	
Number: **AMP-103**	Subject: **Community Relations**	
Approved for use by:	Current Issue: **R0**	Date: **17 Oct 19**
Page 1 of 146	**Prepared by NAES Corporation**	

TABLE OF CONTENTS

TABLES

None

EXHIBITS

None

DOCUMENT REVISION HISTORY

Rev	Rev Date	Description of Changes / Comments
D1	13 Jun 19	Issued for plant review.
R0	17 Oct 19	Issued R0

27. PURPOSE

The purpose of this procedure is to provide guidance to plant personnel regarding good community relations and appropriate media coverage.

Good community relations will benefit plant operation by virtue of minimizing time spent in a defensive or adversarial relationship with community members. It can enhance employee morale through increased company pride and community interaction. It will benefit the community because various resources associated with the plant can help the local community reduce costs, enhance local image, and provide for good labor relations.

28. PERSONNEL ACTIONS

A. The Plant Manager

1.

2.

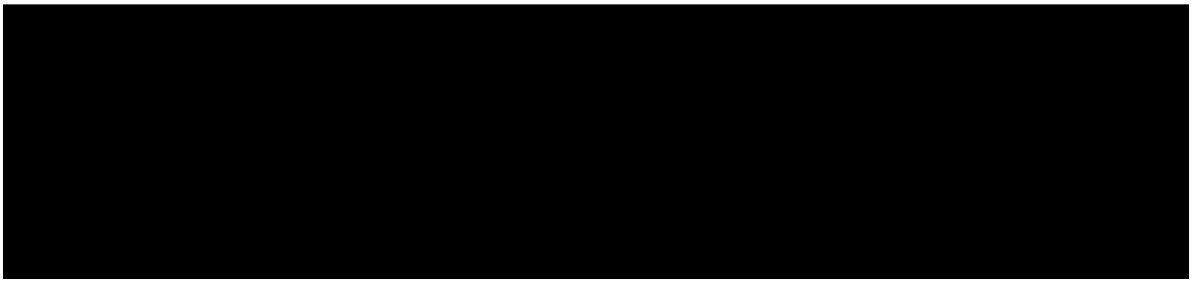
3.

B. Plant Staff

1.

2.

29. PRESS RELEASES



30. MEDIA EVENTS

The purpose of this section is to present guidelines to allow for the plant to more easily address the media. This section was designed primarily to support an emergency or crisis situation however portions can be used during other events. As with Press Releases, the Owner's Representative needs to concur with all actions for media contact.

A. Prior to the media event

1. [redacted]
2.
3.
4.
5.

B. Guidelines for the Spokesperson

The following rules of thumb are designed to assist the spokesperson more easily address the media.

1. [redacted]
2.
3.
4.
5.
6.
7.

8. [redacted]

9. [redacted]

10. [redacted]

11. [redacted]

12. [redacted]

13. [redacted]

14. [redacted]

15. [redacted]

16. [redacted]

17. [redacted]

18. [redacted]

19. [redacted]

20. [redacted]

21. [redacted]

22. [redacted]

23. [redacted]

C. Following the Media Event

1. [redacted]

2. [redacted]

3.

4.

7.0. Drills– PUCT 25.53.(f)