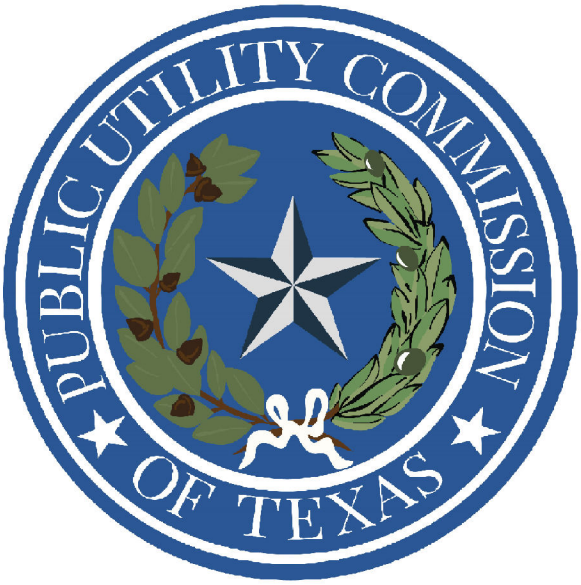

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PUC PROJECT NO. 53385

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

EXECUTIVE SUMMARY

OF

EMERGENCY OPERATIONS PLAN

TEXAS MUNICIPAL POWER AGENCY

MAY 31, 2022

TABLE OF CONTENTS

I. Contents and Policies Contained in the EOP 3
II. References to Specific Sections and Page Numbers Complying with 16 TAC § 25.53 ... 7
A. From the GP&L EOP 7
1. 16 TAC § 25.53(d)(1) Approval and Implementation 7
2. 16 TAC § 25.53(d)(2) Communications Plan 7
3. 16 TAC § 25.53(d)(3) Pre-Identified Supplies for Emergency Response 8
4. 16 TAC § 25.53(d)(4) Staffing During Emergency Response 8
5. 16 TAC § 25.53(d)(5) Weather Related Hazards 8
6. 16 TAC § 25.53(d)(5) Process for Activation of EOP 8
7. 16 TAC § 25.53(e)(1) Transmission and Distribution Annexes 8
8. 16 TAC § 25.53(e)(1)(A) Weather Emergency Annex 8
9. 16 TAC § 25.53(e)(1)(B) Load Shed Annex 8
10. 16 TAC § 25.53(e)(1)(C) Pandemic and Epidemic Annex 9
11. 16 TAC § 25.53(e)(1)(D) Wildfire Annex 9
12. 16 TAC § 25.53(e)(1)(E) Hurricane Annex 9
13. 16 TAC § 25.53(e)(1)(F) Cyber Security Annex 9
14. 16 TAC § 25.53(e)(1)(G) Physical Security Incident Annex 10
15. 16 TAC § 25.53(e)(1)(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) Section II.H. 10
16. 16 TAC § 25.53(e)(2) Generation Annexes 10
17. 16 TAC § 25.53(e)(2)(A) Weather Emergency Annex 10
18. 16 TAC § 25.53(e)(2)(B) Water Shortage Annex 10
19. 16 TAC § 25.53(e)(2)(C) Restoration of Service Annex 11
20. 16 TAC § 25.53(e)(2)(D) Pandemic and Epidemic Annex 11
21. 16 TAC § 25.53(e)(2)(E) Hurricane Annex 11
22. 16 TAC § 25.53(e)(2)(F) Cyber Security Annex 11
23. 16 TAC § 15.53(e)(2)(G) Physical Security Incident Annex 11
B. From the DME EOP 12
III. Record of Distribution 13
IV. Affidavit 19
V. Contacts 22
VI. TMPA EOP 23
VII. GP&L EOP (Redacted) 68
VIII. DME EOP (Redacted) 174

I. Contents and Policies Contained in the EOP

Texas Municipal Power Agency ("TMPA") has developed this Emergency Operations Plan ("EOP") to assist in responding to emergency conditions affecting the electric transmission system. The TMPA EOP is made up of the TMPA EOP, the GP&L EOP and the DME EOP. All of the TMPA system is operated by Garland Power & Light ("GPL") and Denton Municipal Electric ("DME"). DME operates and maintains the transmission facilities within Denton County. GP&L operated and maintains the remainder of the TMPA transmission system.

The purpose of the TMPA ("EOP") is to better enhance the preparation, management and recovery of the organization from emergency events. It has been established to coordinate continued operations during times of emergency including timely restoration of electrical service while maintaining safe, orderly working practices and minimizing customer difficulty in the event of a major outage. Available resources will be coordinated so as to maintain service, prevent damage to existing facilities and restore service to customers that have service interruptions.

The EOP designates operational responsibilities by GP&L and DME.
The objectives of this EOP are to:

1. Protect the continuity of electric service by providing an emergency plan to be implemented when there is a forecast or occurrence of events that affect system security.

2. Support the timely and orderly restoration of electric service following disruptions.

3. Protect the safety of employees and the public during and after emergency operations.

4. Support compliance during emergency conditions with all local, state, and federal regulations and policies as well as all contractual agreements.

5. Inform and coordinate actions and resources between government agencies and regulatory agencies such as the Public Utility Commission of Texas ("PUCT"), North American Electric Reliability Corporation ("NERC"), Federal Energy Regulatory Commission ("FERC"), City Public Safety agencies and the Federal Bureau of Investigation ("FBI").

6. Inform and coordinate actions and resources with the Electric Reliability Council of Texas ("ERCOT").

EOP Applicability

All employees 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.

This EOP applies to all TMPA facilities and employees.

This policy, shall apply to all Texas Municipal Power Agency (TMPA) transmission assets managed by City of Garland and the TMPA transmission assets in the Denton Area operated by Denton Municipal Utilities.

The EOP applies to the following operational situations:

a. **Major Storm** – a period of high incidence of outages from the failure of electric transmission and distribution facilities due to trees or other object coming into contact with electric facilities during periods of high winds or icy conditions

b. **Energy Emergency Alert (EEA)** - An orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an operating condition in which the safety or reliability of the ERCOT electric grid is compromised or threatened, as determined by ERCOT while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System

c. **Extreme Cold Weather** – a period of extreme cold weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

d. **Extreme Hot Weather** - a period of extreme hot weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

e. **Black Start** – restoration of electric service when all or a major portion of the ERCOT electric grid has lost service

f. **Load Shed** – the intentional removal and restoration of firm load customers at the direction of ERCOT, generally in response to a system emergency.

g. **Pandemic** – a period when resources, including personnel, may be limited due to widespread disease or other conditions where the limited physical contact between employees and between employees and the public should be maintained

h. **Sabotage / Terrorism** – response to an act or anticipated act of sabotage or terrorism directed at TMPA Transmission facilities or GP&L facilities

i. **Heightened Security** – a period of increased security due to elevated threat level

j. **Extreme Temperature Events** – Weather events that are beyond the normal anticipated climate for the GP&L or TMPA service territory

k. **Wildfire Events** – a grass or forest fire that has the ability to reduce the quality of electric service to consumers by damaging, degrading or contaminating electric utility facilities

l. **Cyber Security Events** – an intentional cyber-attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

m. **Physical Security Events** – an intentional physical attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

n. **Water Shortage Emergency for Generation** – a period when there is a shortage of water to provide cooling for generating units

o. **Restoration of Service of Generation** – the tripping or failure to start of a generating unit during a period when there is or is expected to be a shortage of generation within the ERCOT electric grid

This EOP may be used as a guideline to indicate general actions and responsibilities for various functions within GP&L. Where this EOP conflicts with other operational documents, such as City Directives, the policies and procedures developed for compliance with NERC, ERCOT or environmental regulations, those documents shall govern.

Emergency activities begin with the decision to implement the EOP and ends with the conclusion of post event activities such as storage of emergency equipment, cost accounting, post event documentation and lessons learned.

The EOP also contains the following sections:

Communications with:

- Handling Complaints
- Public
- Media
- Customers
- Public Utility Commission of Texas
- Office of Public Utility Counsel
- Local and State Governmental Entities, Officials and Emergency Operations Centers
- ERCOT
- Critical Load Customers
- Critical Fuel Suppliers

Plan to Maintain Pre-Identified Supplies for Emergency Response
Staffing During Emergency response
Weather Related Hazards
EOP Activation

- Transmission and Distribution Annexes including:
  - Weather Emergencies including Cold Weather Emergencies and Hot Weather Emergencies
  - Load Shed including:
    - Procedures for the Controlled Shedding of Load
    - Priorities for Restoring Shed Load to Service
    - Registry of Critical Load Customers
    - Procedure for Maintaining an Accurate Registry of Critical Load Customers
  - Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic
  - Wildfire Annex
  - Hurricane Annex
  - Cyber Security Incident
  - Physical Security Incident
  - Facilities Leased or Operated under PURA §39.918(b)(1) or Procured, Owned, or Operated under PURA §39.918(b)(2)

- Drills
- Reporting Requirements

II. References to Specific Sections and Page Numbers Complying with 16 TAC § 25.53

A. From the GP&L EOP

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

Section I.A. Approval and Implementation Section begins on page 10 and continues through page 21. It includes subsections on:

Introduction, 25.53(d)(1)(A), page 10
EOP Applicability, 25.53(d)(1)(A), page 11
Individuals Responsible for Maintaining and Implementing the EOP, 25.53(d)(1)(B), page 13
Revision Control Summary, 25.53(d)(1)(C), page 9 and page 14
Supersedes Previous Versions, 25.53(d)(1)(D), page 1 and page 14
Date of Approval, 25.53(d)(1)(E), page 1 and page 14
Definitions,
Filing Requirements,
How to Use This EOP and
Essential Functions of GP&L

2. 16 TAC § 25.53(d)(2) Communications Plan

Section I.B. Communications Plan begins on page 21 and goes through page 24. It includes subsections on:

Handling Complaints, 25.53(d)(2)(A), page 21
Communicating with the Public, 25.53(d)(2)(A), page 22
Communicating with the Media, 25.53(d)(2)(A) and 25.53(d)(2)(B), page 22
Communicating with the Customers, 25.53(d)(2)(A), page 22
Communicating with the Public Utility Commission of Texas, 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23
Communicating with the Office of Public Utility Counsel, 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23
Communicating with Local and State Governmental Entities, Officials and Emergency Operations Centers. 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23
Communicating with ERCOT 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23
Communicating with Critical Load Customers 25.53(d)(2)(A), page 24 and
Communicating with Critical Fuel Suppliers 25.53(d)(2)(B), page 24

3. 16 TAC § 25.53(d)(3) Pre-Identified Supplies for Emergency Response

Section I.C. Plan to Maintain Pre-Identified Supplies for Emergency Response begins on page 24 and goes through page 25. It includes subsections on:

Lists of Supplies
GP&L Transmission and Distribution
GP&L System Operations and
GP&L Communications

4. 16 TAC § 25.53(d)(4) Staffing During Emergency Response

Section I.D. Staffing During Emergency Response is on page 25.

5. 16 TAC § 25.53(d)(5) Weather Related Hazards

Section I.E. Weather Related Hazards begins on page 26 and goes through page 28. It includes subsections on:

Tornadoes, page 26
Hurricanes, page 26
Extreme Cold Weather, page 26
Extreme Hot Weather, page 26
Drought, page 27 and
Flooding, page 27

6. 16 TAC § 25.53(d)(5) Process for Activation of EOP

Section I.F. EOP Implementation is on page 28.

7. 16 TAC § 25.53(e)(1) Transmission and Distribution Annexes

Section II. Transmission and Distribution Annexes begins on page 29 and continues through page 70. It includes Section H through O below.

8. 16 TAC § 25.53(e)(1)(A)Weather Emergency Annex

Section II.A. Weather Emergency Annex begins on page 29 and goes through page 35. It includes subsections on:

Cold Weather Emergency, 25.53(e)(1)(A)(i), page 29
Cold Weather Emergency Checklist, 25.53(e)(1)(A)(ii), page 31
Hot Weather Emergency, 25.53(e)(1)(A)(i), page 33
Hot Weather Emergency Checklist, 25.53(e)(1)(A)(ii), page 33

9. 16 TAC § 25.53(e)(1)(B)Load Shed Annex

Section II.B. Load Shed Annex begins on page 36 and goes through page 45. It includes subsections on:

Procedures for Controlled Shedding of Load, 25.53(e)(1)(B)(i), page 36
Priorities for Restoring Shed Load to Service, 25.53(e)(1)(B)(ii), page 37
Registry of Critical Load Customers,

Procedure for Maintaining an Accurate Registry of Critical Load Customers, 25.53(e)(1)(A)(iii),

10. 16 TAC § 25.53(e)(1)(C)Pandemic and Epidemic Annex

Section II.C. Pandemic and Epidemic Annex begins on page 46 and goes through page 52. It includes subsections on:

Overview
Conditions to Activate the Pandemic Plan
Pandemic Preparedness Action Levels
Transmission Operations Center Implementation
Distribution
Energy Services
GP&L Accounting and Budget
Personnel – Remote / Non-Remote

11. 16 TAC § 25.53(e)(1)(D)Wildfire Annex

Section II.D. Wildfire Annex begins on page 53 and goes through page 54. It includes subsections on:

Response to Wildfire Emergencies
Mitigations of Hazards of Wildfire

12. 16 TAC § 25.53(e)(1)(E)Hurricane Annex

Section II.E.. Hurricane Annex is on page 55.

13. 16 TAC § 25.53(e)(1)(F)Cyber Security Annex

Section II.F. Cyber Security Annex begins on page 56 and goes through page 65. It includes subsections on:

Cyber Security Incident Response
Declare Incident
Determine Investigation Scope
Collect and Preserve Data
Perform Technical Analysis
Third Party Analysis Support
Adjust Tools
Containment
Eradication
Recover System(s) and Services
Post-Incident Activities
Adjust Sensors, Alerts and Log Collection and Reporting

14. 16 TAC § 25.53(e)(1)(G) Physical Security Incident Annex

Section II.G. Physical Security Incident Annex begins on page 66 and goes through page 69. It includes subsections on:

- Notification
- Assessment
- Response
- Follow up Actions
- Physical System(s) Recovery
- Post-Incident Documentation and Reporting

15. 16 TAC § 25.53(e)(1)(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) Section II.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) is on page 70.

16. 16 TAC § 25.53(e)(2) Generation Annexes

Section III. Generation Annexes begin on page 71 and continue 83. It includes Section Q through W below. They further refer back to section J (pages 46 through 52), Section M (pages 56 through 65) and Section N (pages 66 through 69) above.

17. 16 TAC § 25.53(e)(2)(A)Weather Emergency Annex

Section III.A. Weather Emergency Annex begins on page 71 and goes through page 77. It includes subsections on:

- Cold Weather Emergency Operational Plans, 25.53(e)(2)(A)(i), page 71
- Cold Weather Emergency Verification of the adequacy and operability of fuel switching equipment, if installed, 25.53(e)(2)(A)(ii), page 74
- Cold Weather Emergency Checklist for Generation Resource Personnel, 25.53(e)(2)(A)(iii), page 74
- Hot Weather Emergency Operational Plans, 25.53(e)(2)(A)(i), page 75
- Hot Weather Emergency Verification of the adequacy and operability of fuel switching equipment, if installed, 25.53(e)(2)(A)(ii), page 77
- Hot Weather Emergency Checklist for Generation Resource Personnel, 25.53(e)(2)(A)(i), page 77

18. 16 TAC § 25.53(e)(2)(B)Water Shortage Annex

Section III.B. Water Shortage Annex is on page 78. It includes subsections on:

- Low Lake Level
- Demineralized Water Storage
- Effluent make up water

19. 16 TAC § 25.53(e)(2)(C)Restoration of Service Annex

Section III.C. Restoration of Service Annex is on page 79.

20. 16 TAC § 25.53(e)(2)(D) Pandemic and Epidemic Annex

Section III.D. Pandemic and Epidemic Annex is on page 80. It also refers to Section J above on pages 46 through 52.

21. 16 TAC § 25.53(e)(2)(E) Hurricane Annex

Section III.E.. Hurricane Annex is on page 81.

22. 16 TAC § 25.53(e)(2)(F) Cyber Security Annex

Section III.F. Cyber Security Annex is on page 82. It also refers to Section M above on pages 56 through 65.

23. 16 TAC § 15.53(e)(2)(G) Physical Security Incident Annex

Section III.F. Physical Security Incident Annex is on page 83. It also refers to Section N above on pages 66 through 69.

B. From the DME EOP

DME Emergency Plans for General Operations and Transmission Operations:

Reference to specific sections and page numbers of the DME's EOP or associated plans that correspond with the requirements of the PUCT Rule 25.53

Annual Updates of the EOP and associated plans ..... Bates p. 8

List of primary and backup emergency contacts..... Bates pp. 26-29

Approval and Implementation section ..... Bates pp. 7,22

Introduction and applicability ..... Bates p. 10

Individuals responsible for maintaining and implementing the EOP ..... Bates pp. 11-14

Current EOP supersedes previous EOPs..... Bates p. 8

Effective date of most recent EOP approval..... Bates p. 7

Communication Plan..... Bates pp. 53-59

Complaints and public communication..... Bates pp. 57-58

Maintain pre-identified supplies ..... Bates pp. 38-43

Staffing during emergencies .....Bates pp. 11-14, 26-29

Identify weather-related hazards..... Bates pp. 15-16

Weather annex

Hot Weather.....Bates pp. 15-16, 31-38

Cold Weather.....Bates pp. 15-16, 31-38

Checklist for transmission facility personnel to use ..... Bates p. 51

Load Shed annex..... Bates pp. 60-85

Pandemic annex ..... Bates pp. 86-105

Wildfire annex ..... Bates p. 16

Hurricane annex ..... Bates p. 16

Cyber Security annex ..... Bates pp. 105-108

Physical Security annex ..... Bates p. 109-121

Additional annexes

Geomagnetic Disturbance annex ..... Bates pp. 124-126

Control Center Backup ..... Bates pp. 127-140

DME Black Start Plan..... Bates pp. 141-170

III. Record of Distribution

A. Distribution and Training on GPL EOP

Name	Title	Date Received EOP	Date of EOP Training
Cline, Darrell W	Electric General Manager	5/3/2022	5/7/2022
Hancock III, Tom J	Electric Chief Operating Officer	5/3/2022	5/3/2022
Browning, Christy J	Electric Accounting & Budget Director	5/3/2022	5/5/2022
Palani, Ananth Muruga	Electric Technology Services Director	5/3/2022	5/3/2022
Garcia, Eloy Jeff	Electric AIPS Manager	5/3/2022	5/9/2022
Kimbrough, Elizabeth A	Electric Communications Manager	5/3/2022	5/4/2022
Robertson, Tru P	Settlements Manager	5/3/2022	5/3/2022
Armstrong, Laurie W	Electric Accounting Supervisor	5/3/2022	5/3/2022
Vornberg, Lauri L.	Electric Budget & Procurement Analyst	5/3/2022	5/3/2022
Eavenson, Anne H	Sr. Electric Accountant	5/3/2022	5/4/2022
Wakharkar, Gauri S	Sr. Electric Accountant	5/3/2022	5/6/2022
Terry, Kevin L	Sr. ERCOT Settlement Specialist	5/3/2022	5/3/2022
Dean, Jeremy P	Work Order Specialist	5/3/2022	5/3/2022
Gomez Jr, Rudy	Work Order Specialist	5/3/2022	5/9/2022
McBride, Landon	Electric Communications Specialist	5/3/2022	5/3/2022
Mitchell, Joe B	Electric Application Services Manager	5/3/2022	5/3/2022
Wilson, Patrick M	Electric IT Services Manager	5/3/2022	5/10/2022
Jesudas, Andrews M	Electric Application Services Supervisor	5/3/2022	5/4/2022
Ziesk, Randall T	Server/Storage Infrastructure Supervisor	5/3/2022	5/11/2022
Miller, Daniel J	Sr. Network Administrator	5/3/2022	5/10/2022
Saucedo, Louis Estebon	Systems Engineer	5/3/2022	5/11/2022
Tobin, Jeffrey Shawn	Application Programmer	5/3/2022	5/11/2022
Tesche, Stephen C	Desktop Systems Specialist	5/3/2022	5/11/2022
McMillan, Leslie K	GIS Specialist II	5/3/2022	5/6/2022
Bowman, Trevor Scott	GIS Specialist	5/3/2022	5/4/2022
Donnell, Beckie P	GIS Specialist	5/3/2022	5/3/2022
Amaro, Christopher	PC Technician II	5/3/2022	5/5/2022
Denbow, William K	PC Technician II	5/3/2022	5/3/2022
Stanley, Shari L	PC Technician I	5/3/2022	5/3/2022
Cruz, Perla M	Management Services Coordinator	5/3/2022	5/23/2022
Whitehead, Jonas L	Distribution Director	5/3/2022	5/4/2022
York, Cliff B	Distribution Administrator	5/3/2022	5/3/2022
McFall, Dick O	Distribution Engineering Manager	5/3/2022	5/3/2022
Jo, Julio C	Distribution Staff Engineer	5/3/2022	5/11/2022
Martinez, Richard R	Distribution Superintendent	5/3/2022	5/9/2022
Moin, Mahir Al	Distribution Engineer	5/3/2022	5/3/2022
Enna, Joseph P	Lead Project Coordinator	5/3/2022	5/9/2022

Marshall, Berry A	Project Coordinator II	5/3/2022	5/9/2022
White, Bill G	Project Coordinator II	5/3/2022	5/3/2022
Carrillo, Javier	Project Coordinator I	5/3/2022	5/3/2022
Purser, John	GP&L Vehicle Specialist	5/3/2022	5/3/2022
Bryant, Donna D	Department Coordinator II	5/3/2022	5/3/2022
Flores, Ruben A	Facilities & Inventory Coordinator	5/3/2022	5/3/2022
Attocknie, Darrell J	Distribution Coordinator	5/3/2022	5/4/2022
Caston, Jimmy R	Distribution Coordinator	5/3/2022	5/5/2022
English, Jeff S	Distribution Coordinator	5/3/2022	5/3/2022
Kirk, Jeremy C	Electric Environmental Quality Technician	5/3/2022	5/3/2022
Jones, James Kyle	Journeyman Power Line Technician A	5/3/2022	5/3/2022
Jones, Tommy N	Journeyman Power Line Technician A	5/3/2022	5/4/2022
Lollar, Christopher D	Journeyman Power Line Technician A	5/3/2022	5/12/2022
Nelson, Michael D	Journeyman Power Line Technician A	5/3/2022	5/10/2022
Romadan, Kareem A	Journeyman Power Line Technician A	5/3/2022	5/3/2022
Kline, Lucas A	Journeyman Power Line Technician B	5/3/2022	5/6/2022
Smith, Roderick D	Journeyman Power Line Technician B	5/3/2022	5/4/2022
Baxter, Quade Garrett	Journeyman Power Line Technician C	5/3/2022	5/6/2022
Blevins, Jonathan R	Journeyman Power Line Technician C	5/3/2022	5/10/2022
Hartfield, Roderick D.	Journeyman Power Line Technician C	5/3/2022	5/10/2022
Kamphuis, Troy A	Journeyman Power Line Technician C	5/3/2022	5/3/2022
Leverett, Luke	Journeyman Power Line Technician C	5/3/2022	5/12/2022
Argueta, Federico	Line Crew Foreman	5/3/2022	5/4/2022
Clark, David W	Line Crew Foreman	5/3/2022	5/4/2022
DeHoyos, D. Scott	Line Crew Foreman	5/3/2022	5/11/2022
Farrington, Chris W	Line Crew Foreman	5/3/2022	5/4/2022
Jones Jr., Wallace G	Line Crew Foreman	5/3/2022	5/12/2022
McQueen, Christopher W	Line Crew Foreman	5/3/2022	5/3/2022
Walsh, Robert M	Line Crew Foreman	5/3/2022	5/4/2022
Rotan, Joshua B	Line Troubleshooter	5/3/2022	5/3/2022
Smith, Ian J.	Line Troubleshooter	5/3/2022	5/11/2022
Watson, Eric N	Line Troubleshooter	5/3/2022	5/5/2022
Willhoit, Chance K	Line Troubleshooter	5/3/2022	5/9/2022
Graham, Joshua L	Meter Technician	5/3/2022	5/3/2022
Deal, Brian David	Power Line Technician	5/3/2022	5/6/2022
Green, Kyle Wesley	Power Line Technician	5/3/2022	5/3/2022
Kerrigan, David V	Power Line Technician	5/3/2022	5/5/2022
Ketner, Dusty Lynn	Power Line Technician	5/3/2022	5/10/2022
Lepek, Nicholas Jonathan	Power Line Technician	5/3/2022	5/4/2022
Peterson, Patrick	Power Line Technician	5/3/2022	5/4/2022
Scales, Cody James	Power Line Technician	5/3/2022	5/3/2022
West, Bailey James	Power Line Technician	5/3/2022	5/8/2022
Kuykendall, David C	T&D Contract Inspector I	5/3/2022	5/9/2022
Ledbetter, Michael A	T&D Contract Inspector I	5/3/2022	5/4/2022
Shannon, Danny R	T&D Contract Inspector I	5/3/2022	5/6/2022

White, David W	T&D Contract Inspector I	5/3/2022	5/4/2022
Reese, Terry R.	T&D Contract Inspector II	5/3/2022	5/4/2022
Coburn, Mark A	Electric Plant Administrator	5/3/2022	5/12/2022
McKinney, Gregory G	Electric Plant O&M Manager	5/3/2022	5/10/2022
Richey, Kevin D	Electric Plant O&M Manager	5/3/2022	5/11/2022
Burr, Michael K	Electric Plant Support Manager	5/3/2022	5/3/2022
Stewart, Randall S	Electric Compliance Specialist	5/3/2022	5/10/2022
Asrat, Girma	Electric Plant Operations Supervisor	5/3/2022	5/9/2022
Craddock, Anthony C	Electric Plant Operations Supervisor	5/3/2022	5/8/2022
Ingalls, Michael David	Electric Plant Operations Supervisor	5/3/2022	5/3/2022
Phillis, Kenney J	Electric Plant Operations Supervisor	5/3/2022	5/12/2022
Quintanilla, Alonzo	Electric Plant Operations Supervisor	5/3/2022	5/3/2022
Whiteside, Chad	Electric Plant Operations Supervisor	5/3/2022	5/8/2022
McClain, Jeffrey RP	Electric Plant Environmental Specialist	5/3/2022	5/6/2022
Kelly, Paul D	Maintenance Planner	5/3/2022	5/3/2022
Hart, Robert Lawrence	Electric Plant I&C Technician	5/3/2022	5/3/2022
Magno, Roman Paterno	Lead E I & C Technician	5/3/2022	5/10/2022
Chandler, Bobby G	Lead Maintenance Technician	5/3/2022	5/3/2022
Bagwill, Harold G	Production Technician I	5/3/2022	5/10/2022
Olguin, Bryan	Production Technician I	5/3/2022	5/13/2022
Peeples, George Lee	Production Technician I	5/3/2022	5/4/2022
Regalado, Martha	Production Technician I	5/3/2022	5/11/2022
Reyes, Fortino	Production Technician I	5/3/2022	5/3/2022
Tetreault, Alan Wayne	Production Technician I	5/3/2022	5/7/2022
Thomas, Patrick Bryan	Production Technician I	5/3/2022	5/12/2022
Seldon, Wesley T	Water Treatment Technician	5/3/2022	5/10/2022
Corporon, Terry W.	Electric Plant Sr. Controls Systems Engineer	5/3/2022	5/3/2022
Dick, Rodney E	Electric Plant Controls Systems Engineer	5/3/2022	5/3/2022
May, Michael D	Electric Plant Controls Systems Engineer	5/3/2022	5/5/2022
Ortiz, Silvia E	Department Coordinator II	5/3/2022	5/10/2022
Bailey, Daniel W	Energy Services Director	5/3/2022	5/4/2022
Franklin, Russell F	QSE & Energy Supply Administrator	5/3/2022	5/3/2022
Lee, Billy E	Systems Operations Director	5/3/2022	5/3/2022
Brown Jr, Jack L	Electric Business Operations Manager	5/3/2022	5/3/2022
Figuly, Robert	QSE Real-Time Supervisor	5/3/2022	5/3/2022
Carter, Matthew S	T&D Operations Manager	5/3/2022	5/5/2022
Koliba, David B	Commercial Accounts Administrator	5/3/2022	5/3/2022
Campo, Curtis D	Market & Congestion Analysis Program Manager	5/3/2022	5/3/2022
Carvalho, Misty D	Electric Grid Controller	5/3/2022	5/3/2022
Dickerson, Justin T	Electric Grid Controller	5/3/2022	5/10/2022
Fortenberry, Christopher P	Electric Grid Controller	5/3/2022	5/5/2022
Gooch, Wesley M	Electric Grid Controller	5/3/2022	5/12/2022
Loftin, Michael D	Electric Grid Controller	5/3/2022	5/3/2022
Mccreary, Shawn D	Electric Grid Controller	5/3/2022	5/11/2022
Reeves, Corey G	Electric Grid Controller	5/3/2022	5/9/2022

Snider, David L	Electric Grid Controller	5/3/2022	5/7/2022
Strickland, Matthew K	Electric Grid Controller	5/3/2022	5/5/2022
Tezeno, Todd W	Electric Grid Controller	5/3/2022	5/3/2022
White, Shea E	Electric Grid Controller	5/3/2022	5/12/2022
Ottmer, Patrick J	Senior EMS Engineer	5/3/2022	5/3/2022
Carroll, Jeffrey D	Sr. Real-time Power Trader	5/3/2022	5/7/2022
Ledbetter, Bradley C	Sr. Real-time Power Trader	5/3/2022	5/11/2022
Vaughn Jr, Victor A	T&D Operations Coordinator	5/3/2022	5/3/2022
So, Juliana W.	EMS Engineer	5/3/2022	5/5/2022
Phillips, Grant Francis	Real-time Power Trader	5/3/2022	5/9/2022
Brunson, Bryan T	Associate Real-time Power Trader	5/3/2022	5/3/2022
Pham, Long T	Associate Real-time Power Trader	5/3/2022	5/3/2022
Walsh, Thomas Daniel	Associate Real-time Power Trader	5/3/2022	5/3/2022
Hedges, Joanna Laura	Electric Compliance Analyst	5/3/2022	5/3/2022
Redic, Derwin W	SCADA Communication Supervisor	5/3/2022	5/12/2022
Jolly, Gary L	SCADA Communication Specialist	5/3/2022	5/3/2022
Shedd, Michael C	SCADA Communication Specialist	5/3/2022	5/3/2022
Crabtrey, Charles E	Operations Technical Services Manager	5/3/2022	5/3/2022
Ward, Jeffrey M	Network & Cyber Sec Supervisor	5/3/2022	5/3/2022
LaRosa, Jesus	Sr. Network Administrator	5/3/2022	5/3/2022
Nelson, Lovinsky Ruud	Sr. Network Administrator	5/3/2022	5/3/2022
Dollar, Kevin M	Application Programmer	5/3/2022	5/3/2022
Musser, Bryan	Sr. Systems Administrator	5/3/2022	5/11/2022
Pleasant, James Robert	Electric Network Administrator	5/3/2022	5/11/2022
Mansell, Cole V	System Operations Prog Coord	5/3/2022	5/3/2022
Barrera Saucedo, Elena G	Department Coordinator II	5/3/2022	5/10/2022
Dos Santos, Andrea N	Department Coordinator I	5/3/2022	5/4/2022
Connaway, Wes J	Risk Mgmt & Safety Manager	5/3/2022	5/3/2022
Albright, Mark	Risk Mgmt & Safety Specialist	5/3/2022	5/10/2022
Reece, Jessica J	Risk Mgmt & Safety Specialist	5/3/2022	5/2/2022
Baber III, George Mack	Transmission Staff Engineer	5/3/2022	5/10/2022
Huynh, Danh V.	Transmission Staff Engineer	5/3/2022	5/3/2022
Saboor, Ahmad	Transmission Staff Engineer	5/3/2022	5/4/2022
Carter, Eric L	Transmission Engineer	5/3/2022	5/5/2022
Saygi, Kevin F	Transmission Engineer	5/3/2022	5/11/2022
Thibodeaux, Jerald Wayne	Associate Substation Technician	5/3/2022	5/5/2022
Larey, Ransom S	Project Designer I	5/3/2022	5/4/2022
Vanderslice, Regina F.	Accounting Representative II	5/3/2022	5/3/2022
James, William E	Lead Relay Technician	5/3/2022	5/5/2022
Braziel, Gary H	Lead Substation Technician	5/3/2022	5/3/2022
Owens, John D	Lead Substation Technician	5/3/2022	5/9/2022
Belen, Apolinario B	Relay Technician	5/3/2022	5/5/2022
Brister, Charles J	Relay Technician	5/3/2022	5/5/2022
Gutierrez, Santiago	Relay Technician	5/3/2022	5/5/2022
Alexander, Roger E	Substation Technician	5/3/2022	5/3/2022

Brannon, Marvin Anthony	Substation Technician	5/3/2022	5/5/2022
Harder, Christopher D	Substation Technician	5/3/2022	5/5/2022
Luna, Robert	Substation Technician	5/3/2022	5/5/2022
Swagerty, Tommy R	T&D Supervisor - Substation Maintenance	5/3/2022	5/10/2022
Beck, George	T&D Supervisor Substation Electronics	5/3/2022	5/3/2022
Grubbs, David L	Electric Regulatory Compliance Officer	5/3/2022	5/3/2022
Martin, Thomas Steven	Transmission Director	5/3/2022	5/5/2022
Zaragoza, Stephen	Transmission Engineering Administrator	5/3/2022	5/3/2022
Foster, Stephen F	Transmission Manager	5/3/2022	5/3/2022
Harrelson, Jeremy B	Transmission Manager	5/3/2022	5/11/2022
Santos, Juan S	Transmission Planning Manager	5/3/2022	5/4/2022
Godfrey, David H	Critical Infrastructure Protection Manager	5/3/2022	5/3/2022
Ngo, Minh-Luan D	Electric Compliance Specialist	5/3/2022	5/3/2022
Winans, Grant	T&D Vegetation Management Coordinator	5/3/2022	5/5/2022
Hall, James C	Substation Security Coordinator	5/3/2022	5/3/2022
Donnell, Michael D	Substation Technician	5/3/2022	5/6/2022
Day, David M	Cyber Security Administrator	5/3/2022	5/12/2022
Ramirez, Maria E	Department Coordinator II	5/3/2022	5/3/2022
Price, Janice	Department Representative II	5/3/2022	5/3/2022
Ayers, John J	Journeyman Power Line Technician A	5/3/2022	5/4/2022
Mahan Jr, Fred A	Journeyman Power Line Technician A	5/3/2022	5/4/2022
Neufeld, Darren D	Journeyman Power Line Technician C	5/3/2022	5/4/2022
Cauble, Jacob Adam	Line Crew Foreman	5/3/2022	5/4/2022
Smith, Delton E.	Line Crew Foreman	5/3/2022	5/3/2022
Wilson, Gregory A	Line Crew Foreman	5/3/2022	5/10/2022
Hoffmann, Jaden Scott	Power Line Technician	5/3/2022	5/4/2022
Hooten, Jacob Stewart	Power Line Technician	5/3/2022	5/4/2022
Raduechel, Chad Mitchell	Power Line Technician	5/3/2022	5/11/2022
Rhodes, Micah Allen	Power Line Technician	5/3/2022	5/4/2022
Creed, Brian T	Relay Technician	5/3/2022	5/5/2022
Holder, Justin Heath	Substation Technician	5/3/2022	5/5/2022
Miller, Jacob Matthew	Substation Technician	5/3/2022	5/10/2022
Cobler, Stephen B	T&D Supervisor - Transmission Operations	5/3/2022	5/3/2022
Acosta, Leonel	Line Crew Foreman	5/3/2022	5/3/2022

B. Distribution and Training on DME EOP

Meeting Summary	EOP Training Record
Meeting Title	Emergency Operations Plan training
Meeting Start Time	5/13/2022, 2:50:58 PM
Meeting End Time	5/13/2022, 3:44:29 PM

Full Name
Ames, Linda M
Wilkins, Jason L
Ruiz, Elizabeth C
Walding, Brian K
Bridges, Sam E.
Delira, Melissa
Looper, Jerry D.
Puente, Antonio
Love, Jonathan
Blackburn, Cassie L
Zahn, Cameron M
Brown, Jason W.
Day, Smith L
Shepherd, Bill
Fielder, Jerry G
Hamby, Brandon S.
Watts, Bradley J.
Stastny, Stephen C.
Amyx, Lanny
Griffin, Kevin
Breon, Doug J
Johnson, Stephen C
Brown, Jeff
Lutrick, Chris P
Gaytan, Jose A
Naulty, Terrance

IV. Affidavit

AFFIDAVIT

STATE OF TEXAS §
COUNTY OF BRAZOS§

I, Bob Kahn, being duly sworn, state under oath that I am the General Manager of Texas Municipal Power Agency ("TMPA"), a municipally owned electric utility, and I attest that I am the highest-ranking officer within TMPA with the authority to affirm the following facts (based upon my personal knowledge or the personal knowledge of those who report to me) and opinions (to the best of my belief and based upon reasonable factual inquiry):

- TMPA is a transmission only municipal utility and all transmission assets are operated by Garland Power & Light ("GPL") and Denton Municipal Electric ("DME");
- the TMPA Emergency Operating Plan ("EOP") is made up of the combination of the TMPA EOP, the GP&L EOP and the DME EOP;
- relevant operating personnel are familiar with and have received training on the applicable contents and execution of the TMPA EOP, the GP&L EOP, the DME EOP, and such personnel are instructed to follow the applicable portions of the respective EOPs except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
- the EOPs have been reviewed and approved by the appropriate executives;
- the drill for the DME EOP was completed. A drill has yet to be conducted for the 2022 calendar year to the extent required by subsection (f) of PUCT Rule 25.53 for the GP&L EOP, however, it is anticipated that the drill will be completed during the 2022 calendar year and once the drill has been completed a supplemental filing will be made with the PUCT;
- the EOPs or an appropriate summary has been distributed to local jurisdictions as needed;
- GP&L and DME maintain business continuity plans that addresses returning to normal operations after disruptions caused by an incident; and
- GP&L's and DME'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.

Bob Kahn
General Manager
Texas Municipal Power Agency

Before me, a Notary Public, on this day personally appeared Bob Kahn, known to me as the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this 31 day of May, 2022.

Notary Public, State of Texas

CHRISTIAN DOMINIC ANHALT
My Notary ID # 132142652
Expires August 23, 2023

Notary ID#: 132142652

Commission Expires: August 23, 2023

V. Contacts

Primary Contact

Bob Kahn	General Manager	bkahn@texasmpa.org	512-694-9867

VI. TMPA EOP

This Emergency Operations Plan is considered CONFIDENTIAL and is FOR OFFICIAL USE ONLY by City of Garland, Fenton Municipal Electric and TMPA employees only. Any distribution to other than City of Garland, DME or TMPA personnel requires the approval of the TMPA General Manage or the GP&L Electric Regulatory Compliance Officer,

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TEXAS MUNICIPAL POWER AGENCY

EMERGENCY OPERATIONS PLAN

Effective Date: May 31, 2022
This Plan supersedes all previous versions of the Emergency Operations Plan.

Approved Bob Kahn
Bob Kahn

May 31, 2022
Date of Approval

Title General Manager

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	0	05/31/2022	1	Confidential

This Emergency Operations Plan is considered CONFIDENTIAL and is FOR OFFICIAL USE ONLY by City of Garland, Fenton Municipal Electric and TMPA employees only. Any distribution to other than City of Garland, DME or TMPA personnel requires the approval of the TMPA General Manage or the GP&L Electric Regulatory Compliance Officer,

TABLE OF CONTENTS

TABLE OF CONTENTS 2
PREFACE 6
REVISIONS 6
I. EMERGENCY OPERATIONS PLAN 7
A. Approval and Implementation 7
1. Introduction 7
2. EOP Applicability 8
a. Major Storm 8
b. Energy Emergency Alert (EEA) 8
c. Extreme Cold Weather 8
d. Extreme Hot Weather 9
e. Black Start 9
f. Pandemic 9
g. Sabotage / Terrorism 9
h. Heightened Security 9
i. Extreme Temperature Events 9
j. Wildfire Events 9
k. Cyber Security Events 9
l. Physical Security Events 9
3. Individuals Responsible for Maintaining and Implementing the EOP 9
a. Hierarchy of Responsibility 9
b. Maintenance of the EOP 9
c. Changing the EOP 9
d. Communications Personnel 10
e. Implementation of Plan 10
4. Revision Control Summary 10
5. Supersedes Previous Versions 10
6. Date of Approval 10
7. Definitions 11
a. Annex 11
b. Black Start 11
c. Business Continuity Plan (“BCP”) 11
d. Chronic Condition Residential Customer 11
e. Control Center 11
f. Control Room 11
g. Critical Care Residential Customer 11
h. Critical Load 11
i. Critical Load Public Safety Customer 12
j. Critical Load Industrial Customer 12

k. Critical Natural Gas Facility 12
l. Critical Water or Wastewater Customer 12
m. Drill 12
n. Electronic Security Perimeter (ESP) 12
o. Emergency 12
p. Emergency Operations Plan 12
q. Entity 12
r. ERCOT Emergency Condition 13
s. ERCOT Energy Emergency Alert (EEA) 13
t. Flooding Event 13
u. General Hospital 13
v. Hazard 13
w. Heightened Security 13
y. Natural Disaster 13
z. Pandemic 13
aa. Physical Security Perimeter (PSP) 14
bb. Resource 14
cc. Sabotage 14
dd. Special Hospital - 14
ee. Threat 14
8. Filing Requirements 15
9. How to Use This EOP 15
B. Communications Plan 17
1. Handling Complaints 17
2. Communicating with the Public 17
3. Communicating with the Media 17
4. Communicating with the Customers 17
5. Communicating with the Public Utility Commission of Texas (PUCT) 17
6. Communicating with the Office of Public Utility Council (OPUC) 18
7. Communicating with Local and State Governmental Entities, Officials and Emergency Operations Centers 18
8. Communicating with ERCOT 18
9. Communicating with Critical Load Customers 19
10. Communicating with Critical Fuel Suppliers 19
C. Plan to Maintain Pre-Identified Supplies for Emergency Response 19
1. Lists of Supplies 19
D. Staffing during Emergency Response 19
E. Weather Related Hazards 19
1. Tornadoes 19
2. Hurricanes 20
3. Extreme Cold Weather 20
4. Extreme Hot Weather 20

5. Drought 21
6. Flooding 21
F. EOP Implementation 21
1. Activation of EOP 21
II. TRANSMISSION AND DISTRIBUTION ANNEXES 22
A. Weather Emergency Annex 22
1. Cold Weather Emergency 22
a. Operational Plans 22
b. Checklist for Transmission and Distribution Facility Personnel 22
i. Lessons Learned from Past Weather Emergencies 22
ii. Materials 22
iii. Fuel 22
iv. Food and Water 22
v. Boarding 22
vi. Tools 22
vii. PPE 22
2. Hot Weather Emergency 23
a. Operational Plans 23
b. Checklist for Transmission and Distribution Facility Personnel 23
TMPA does not have any operations personnel. 23
i. Lessons Learned from Past Weather Emergencies 23
ii. Materials 23
iii. Fuel 23
iv. Food and Water 23
v. Boarding 23
vi. Tools 23
B. Load Shed Annex 24
1. Procedures for Controlled Shedding of Load 24
2. Priorities for Restoring Shed Load to Service 24
3. Registry of Critical Load Customers 24
a. hospitals, ... 24
b. police stations, ... 24
c. fire stations 24
d. critical water and wastewater facilities 24
e. customers with special in-house life-sustaining equipment 24
f. Critical Natural Gas Facility designated by the Railroad Commission of Texas 24
g. Critical Load Industrial Customers 24
h. Critical Load Public Safety Customers 24
i. Critical Care Residential Customers and Chronic Condition Residential Customers 24
4. Procedure to Maintaining an Accurate Registry of Critical Load Customers 25
C. Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic 26
D. Wildfire Annex 27

1. Response to Wildfire Emergencies 27
2. Mitigations of Hazards of Wildfire 27
E. Hurricane Annex 28
F. Cyber Security Incident 29
1. Cyber Security Incident Response 29
G. Physical Security Incident 30
H. Facilities Leased or Operated under PURA §39.918(b)(1) or Procured, Owned, or Operated under PURA §39.918(b)(2) 31
III. GENERATION ANNEXES 32
IV. DRILLS 33
V. REPORTING REQUIREMENTS 34
Appendix A –PUCT §25.53 Electric Service Emergency Operations Plans 35
Appendix B – Texas Water Code 43

This Emergency Operations Plan is considered CONFIDENTIAL and is FOR OFFICIAL USE ONLY by City of Garland, Fenton Municipal Electric and TMPA employees only. Any distribution to other than City of Garland, DME or TMPA personnel requires the approval of the TMPA General Manage or the GP&L Electric Regulatory Compliance Officer,

PREFACE

Texas Municipal Power Agency (TMPA) has developed this Emergency Operations Plan to assist in responding to emergency conditions affecting the electric system.

TMPA's philosophy is that employees need to retain their normal responsibilities as much as possible during an emergency. However, all employees are required to familiarize yourself with all of the contents of this plan so that you can quickly access the information you need in an emergency and to anticipate actions that will be taken by others.

REVISIONS

Revision	Date	Change
0	5/31/2022	Original in this Format (Replaces previous EOPs)

I.EMERGENCY OPERATIONS PLAN

A. Approval and Implementation

1. Introduction

The purpose of the TMPA Emergency Operations Plan ("EOP") is to better prepare the organization for the preparation, management and recovery from emergency events. It has been established to coordinate continued operations during times of emergency including timely restoration of electrical service while maintaining safe, orderly working practices and minimizing customer difficulty in the event of a major outage. Available resources will be coordinated so as to maintain service, prevent damage to existing facilities and restore service to customers that have service interruptions.

This EOP designates operational responsibilities within TMPA and its operations through Garland Power and Light ("GP&L") and Denton Municipal Electric ("DME"). It incorporates the EOPs of GP&L and DME as part of this EOP.

The objectives of this EOP are to:

1. Protect the continuity of electric service by providing an emergency plan to be implemented when there is a forecast or occurrence of events that affect system security.

2. Support the timely and orderly restoration of electric service following disruptions.

3. Protect the safety of TMPA, GP&L and DME employees and the public during and after emergency operations.

4. Ensure TMPA operations during emergency conditions comply with all local, state, and federal regulations and policies as well as all contractual agreements.

5. Maintain communications with appropriate entities to determine service conditions, communicate expected actions and service expectations, and request actions.

6. Inform and coordinate actions and resources between government agencies and regulatory agencies, the Public Utility Commission of Texas ("PUCT"), North American Electric Reliability Corporation ("NERC"), Federal Energy Regulatory Commission ("FERC"), City Public Safety agencies and the Federal Bureau of Investigation ("FBI").

7. Inform and coordinate actions and resources with the Electric Reliability Council of Texas ("ERCOT").

2. EOP Applicability

TMPA is a transmission-only, municipally-owned and operated electric utility. This EOP applies to all TMPA applicable business functions performed by Garland Power & Light and DME under NERC registrations, Joint Registration Agreements, Coordinated Functional Registration Agreements, Delegation Agreements, or Transmission Agreements.

TMPA has transferred the operations and maintenance of all electric facilities to GP&L and DME.

On March 27, 2013, the Texas Municipal Power Agency ("TMPA") and Garland entered into a Transmission Operator, Maintenance, and Construction Services Agreement ("TMPA/Garland Transmission Agreement"). The TMPA/Garland Transmission Agreement imposes Transmission Owner and Operator duties of TMPA Transmission System assets, including all regulatory compliance upon Garland. (Ref. Transmission Operator, Maintenance, and Construction Services Agreement. March 27, 2013). The TMPA/Garland Transmission Agreement was amended by Amendment No. 1 on March 29, 2016 with an effective date of April 27, 2016. This amendment modifies the Garland responsibilities for the TMPA Denton Area Transmission System, as described in Exhibit "A" of the Garland TOP Agreement.

All TMPA transmission facilities within Denton County are operated and maintained by DME.

This policy, shall apply to all Texas Municipal Power Agency (TMPA) assets managed by City of Garland and DME.

The EOP applies to the following operational situations:

a. **Major Storm** – a period of high incidence of outages from the failure of electric transmission and distribution facilities due to trees or other object coming into contact with electric facilities during periods of high winds or icy conditions

b. **Energy Emergency Alert (EEA)** - An orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an operating condition in which the safety or reliability of the ERCOT electric grid is compromised or threatened, as determined by ERCOT while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System

c. **Extreme Cold Weather** – a period of extreme cold weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

d. **Extreme Hot Weather** - a period of extreme hot weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

e. **Black Start** – restoration of electric service when all or a major portion of the ERCOT electric grid has lost service

f. **Pandemic** – a period when resources, including personnel, may be limited due to widespread disease or other conditions where the limited physical contact between employees and between employees and the public should be maintained

g. **Sabotage / Terrorism** – response to an act or anticipated act of sabotage or terrorism directed at TMPA Transmission facilities or GP&L facilities

h. **Heightened Security** – a period of increased security due to elevated threat level

i. **Extreme Temperature Events** – Weather events that are beyond the normal anticipated climate for the GP&L or TMPA service territory

j. **Wildfire Events** – a grass or forest fire that has the ability to reduce the quality of electric service to consumers by damaging, degrading or contaminating electric utility facilities

k. **Cyber Security Events** – an intentional cyber-attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

l. **Physical Security Events** – an intentional physical attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

3. Individuals Responsible for Maintaining and Implementing the EOP

a. Hierarchy of Responsibility

This section describes personnel responsibilities during an emergency. The philosophy of the EOP is to maintain the existing organizational structure and duties as much as possible during an emergency so that personnel have as little adjustment as possible in transitioning to their emergency roles. However, depending on the nature of the emergency and the availability of key personnel, some changes in the normal organizational structure may be implemented.

b. Maintenance of the EOP

The EOP shall be reviewed and updated, if needed, at least once each calendar year. The GP&L Electric Regulatory Compliance Officer shall coordinate the revision efforts and shall present any revisions to TMPA for review.

c. Changing the EOP

If there are changes that are approved, the EOP shall be signed by one or more persons to indicate approval.

d. Communications Personnel

Primary communications during the event will be made by GP&L and DME in accordance with their EOPs.

Communications from TMPA will be made by TMPA's General Manager ("General Manager") on the status of the emergency using appropriate communication channels. The information provided by personnel in the field, operations or ERCOT to the General Manager, GPL and DME will be used to create message content. To ensure consistent, accurate, coordinated and controlled reporting of information to the media, public and employees, no information should be released except through the General Manager or their designees.

e. Implementation of Plan

This EOP is a collection of actions that cover many scenarios and ranges of actions. It covers preparatory actions as well as responsive actions. The EOP may be invoked by GP&L or DME for actions or preparation of actions related to applicable situations for the assets they operate. Activation of the EOP in one division does not necessarily indicate activation of the plan for all divisions. Only the portion of the EOP required for reliable operations needs to be invoked. As an example, a wildfire emergency in one part of the state may not affect personnel in other parts of the state.

4. Revision Control Summary

All official versions of the EOP shall be documented in a Revision Control table. The table shall identify the version number, a summary of significant changes, and the effective date of the version.

5. Supersedes Previous Versions

This version of the EOP supersedes all previous version of this EOP as of the effective date of this plan.

6. Date of Approval

The date of approval of the EOP shall be the latest date of the signature on the cover page of this EOP.

The effective date of the plan shall be identified on the cover page and may be any date after the approval date of the plan or up to 30 days prior to the approval date.

7. Definitions

a. **Annex** -- a section of an emergency operations plan or business continuity plan that addresses how an entity plans to respond to the incidence of a specific hazard or threat.

b. **Black Start** - the recovery from a blackout of a complete or significant portion of the ERCOT electric grid.

c. **Business Continuity Plan ("BCP")** – the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in the recovery from an emergency.

d. **Chronic Condition Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to prevent the impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition. If that serious medical condition is diagnosed or re-diagnosed by a physician as a life-long condition, the designation is effective under this section for the shorter of one year or until such time as the person with the medical condition no longer resides in the home. Otherwise, the designation or re-designation is effective for 90 days.

e. **Control Center** - One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.

f. **Control Room** – A facility from which operating personnel are able to monitor and control substation or generation equipment located at a single geographic location. Control may be of more than one generating unit or substation as long as they are located at a single geographic location.

g. **Critical Care Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or redesignation is effective for two years under PUCT Rule 25.53.

h. **Critical Load** - load for which electric service is considered crucial for the protection or maintenance of public health and safety; including but not limited to Critical Load Public Safety Customers, Critical Load Industrial Customer, Chronic Condition Residential Customer, Critical Care Residential Customer, customers with special in-house life-

sustaining equipment, Critical Natural Gas Facilities and Critical Water or Wastewater Customers.

i. **Critical Load Public Safety Customer** - a customer for whom electric service is considered crucial for the protection or maintenance of public safety, including but not limited to hospitals, police stations, fire stations, and critical water and wastewater facilities.

j. **Critical Load Industrial Customer** - an industrial customer for whom an interruption or suspension of electric service will create a dangerous or life-threatening condition on the retail customer's premises, is a "critical load industrial customer."

k. **Critical Natural Gas Facility** - a facility designated as a critical customer by the Railroad Commission of Texas under §3.65(b) (relating to Critical Designation of Natural Gas Infrastructure) unless the facility has obtained an exception from its critical status. Designation as a critical natural gas facility does not guarantee the uninterrupted supply of electricity.

l. **Critical Water or Wastewater Customer** – a water utility facility that has submitted an annual application for designation as a Critical Water of Wastewater customer and has been granted such by the electric utility under TWC §13.1396.

m. **Drill** - an operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.

n. **Electronic Security Perimeter (ESP)** – the logical border surrounding a network to which Cyber Systems are connected using a routable protocol.

o. **Emergency** - any incident resulting from an imminent hazard or threat that endangers life or property or presents credible risk to the continuity of electric service. The term includes an emergency declared by local, state, or federal government; ERCOT; or a NERC Reliability Coordinator that is applicable to the entity.

p. **Emergency Operations Plan** - the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in response to an emergency.

q. **Entity** - an electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.

r. **ERCOT Emergency Condition** - An operating condition in which the safety or accountability of the ERCOT system is compromised or threatened, as determined by ERCOT.

s. **ERCOT Energy Emergency Alert (EEA)** - an orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an Emergency Condition while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System.

t. **Flooding Event** – an event where an overflow of water submerges dry land which is normally dry and causes roadways and bridges to become impassable.

u. **General Hospital** – under Texas Health and Safety Code §241.003(5) means an establishment that:
(A) offers services, facilities and beds for use for more than 24 hours for two or more unrelated individuals requiring diagnosis, treatment, or care for illness, injury, deformity, abnormality, or pregnancy, and
(B) regularly maintains, at a minimum, clinical laboratory services, diagnostic X-ray services, treatment facilities including surgery or obstetrical care or both, and other definitive medical or surgical treatment of similar extent.

v. **Hazard** – a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property.

w. **Heightened Security** - For the purposes of this document Heightened Security is defined as a condition in which a specific or non-specific threat has been identified against the City of Garland electric utility assets or personnel. This may be a physical threat or a cyber threat.

x. **Hospital** - Texas Health and Safety Code §241.003(7) defines Hospital as a General Hospital or a Special Hospital.

y. **Natural Disaster** – a major adverse event resulting from natural processes of the earth; examples include floods, tornados, earthquakes, tsunamis, and other geologic processes. A natural disaster can cause loss of life or property damage, and typically leaves some economic damage in its wake, the severity of which depends on the affected population's resilience or ability to recover.

z. **Pandemic** – a widespread disease that has the potential to affect the health and ability of the workforce to function normally.

aa. Physical Security Perimeter (PSP) – the physical barrier surrounding locations in which Cyber Assets, Cyber Systems or Electronic Access Control or Monitoring Systems reside, and for which access is controlled.

bb. Resource – an energy storage resource, a generation resource or a load resource.

cc. Sabotage – The GP&L procedures define Sabotage as:

- Destruction of an employer's property (as tools or materials) or the hindering of manufacturing by discontented workers.
- Destructive or obstructive action carried on by a civilian or enemy agent to hinder a nation's war effort.
- An act or process tending to hamper or hurt.
- Deliberate subversion.

Acts of sabotage may be carried out in many different ways. For an incident to be considered an act of sabotage there will be an underlying intent by a person to disrupt, obstruct, hamper, destroy, or hurt people or property.

- If a person loses control of their vehicle and runs into a utility pole, that is an accident.
- If a person cuts down a utility pole with a chain saw, that is sabotage.
- If an employee working mistakenly deletes a computer file that is an accident.
- If an employee places a Trojan horse in the City's computer system, that is sabotage.

dd. Special Hospital - per Texas Health and Safety Code §241.003(15) means an establishment that:
(A) offers services, facilities, and beds for use for more than 24 hours for two or more unrelated individuals who are regularly admitted, treated, and discharged and who require services more intensive than room, board, personal services, and
general nursing care;
(B) has clinical laboratory facilities, diagnostic X-ray facilities, treatment facilities, or other definitive medical treatment;
(C) has a medical staff in regular attendance; and
(D) maintains records of the clinical work performed for each patient.

ee. Threat - the intention and capability of an individual or organization to harm life, information, operations, the environment, or property.

8. Filing Requirements

a. A municipal utility must file an EOP under PUCT Rule §25.53 by June 1, 2022. Beginning in 2023, an entity must annually file an EOP no later than March 15 in the manner prescribed by the PUCT.
   i. An entity must file with the PUCT an Executive Summary of the EOP.
   ii. An entity must file with the PUCT a redacted copy of the EOP.
   iii. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.
   iv. Beginning in 2023, the annual EOP must include, for each incident in the prior calendar year that required the entity to activate its EOP, a summary after-action report that includes lessons learned and an outline of changes the entity made to the EOP as a result.

b. A person seeking registration as a power generation company ("PGC") or certification as a retail electric provider ("REP") must file an EOP with the PUCT 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 PUCT approves the person's certification or registration.

c. Updated filings. An entity must file an updated EOP with the PUCT within 30 days under the following circumstances.
   i. An entity must file an updated EOP if PUCT staff determines that the entity's EOP on file does not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency.
   ii. An entity must file an updated EOP in response to feedback provided from PUCT staff.
   iii. An entity must file an updated EOP if the entity makes a significant change to its EOP. A significant change to an EOP includes a change that has a material impact on how the entity would respond to an emergency. The entity must file the updated EOP with the commission no later than 30 days after the change takes effect.
   iv. An entity with operations within the ERCOT power region must submit its updated EOP under paragraphs (c)(4)(A), (c)(4)(B), and (c)(4)(C) to ERCOT within 30 days of filing the updated EOP with the PUCT.

9. How to Use This EOP

This EOP may be used as a guideline to indicate general actions and responsibilities for various functions within GP&L and DME for TMPA assets. Where this EOP conflicts with other operational documents, the policies and procedures developed for compliance with NERC, ERCOT or environmental regulations, those documents shall govern. This EOP is ONLY for general reference and to assist each division to understand the overall anticipated actions of the GP&L and DME when operating TMPA facilities.

This EOP is divided into eleven parts:

Approval and Implementation
Communications Plan
Plan to Maintain Pre-Identified Supplies for Emergency Response
Staffing During Emergency Response
Weather Related Hazards
Other Emergencies
EOP Implementation
Drills
Reporting Requirements
Transmission and Distribution Annexes
Appendices

The eleven-part structure is designed to allow easy access to needed information before and during an emergency.

Emergency Preparedness refers to all activities that occur prior to an actual emergency.

Business Continuity Plans covers those actions following the termination of the Emergency designation until all customers have been restored, all affected equipment inspected and necessary repairs made and full normal operations have resumed.

Section I – Emergency Operations Plan, provides the background information to implement the EOP quickly in an emergency.

Emergency activities begin with the decision to implement the EOP and ends with the conclusion of post event activities such as storage of emergency equipment, cost accounting, post event documentation and lessons learned.

Section II – Transmission and Distribution Annexes contains quick reference lists and procedures that can be accessed and scanned quickly during an emergency.

B. Communications Plan

1. Handling Complaints

TMPA does not provide service to any retail customers.

Any complaints shall continue to be handled by GP&L and DME according their EOP's.

Complaints received in by TMPA by email will be handled during normal business hours by TMPA's General Manger or their designee.

2. Communicating with the Public

Communications with the public shall generally be through GP&L and DME according to their EOP's.

Communications directly from TMPA will be made by the TMPA General Manager or his designee.

3. Communicating with the Media

Communications with the media shall generally be through GP&L and DME according to their EOP's.

Communications directly from TMPA will be made by the TMPA General Manager or his designee.

4. Communicating with the Customers

TMPA does not provide service to any retail customers.

Communications with the customers shall generally be through GP&L and DME according to their EOP's.

Communications directly from TMPA will be made by the TMPA General Manager or his designee.

5. Communicating with the Public Utility Commission of Texas (PUCT)

TMPA will communicate with the PUCT by phone or email as needed, depending on the event. TMPA's General Manager is the PUCT emergency contact.

GP&L and DME will communicate with the PUCT by phone or email as needed, depending on the event in accordance with their EOPs.

GP&L and DME Communications will notify the PUCT by email of significant outages as defined by 16 TAC §25.52(c)(5) per their EOP's.

6. Communicating with the Office of Public Utility Council (OPUC)

TMPA will communicate with the PUCT by phone or email as needed, depending on the event.

GP&L and DME will communicate with the PUCT by phone or email as needed, depending on the event in accordance with their EOPs.

GP&L and DME Communications will notify the PUCT by email of significant outages as defined by 16 TAC §25.52(c)(5) per their EOP's.

7. Communicating with Local and State Governmental Entities, Officials and Emergency Operations Centers

During emergency events GP&L and DME will communicate with local and state government entities, officials and emergency operations centers through the City of Garland Emergency Operations Center and the City of Denton Emergency Operations Center according to their EOPs.

During minor events this communication should generally be through normal channels. In more significant events which require the activation of the City's Emergency Operations Center ("EOC"), GP&L shall designate one or more representatives to represent GP&L at the City of Garland EOC. Upon appointment of the GP&L representatives, communications with the EOC should go through the appropriate EOC representatives.

Each City's Office of Emergency Management will communicate with other local and state government entities, officials and emergency operations centers.

8. Communicating with ERCOT

The GP&L Transmission Operations Center and the DME Transmission Operations Center shall continue regular communications with ERCOT as outlined in the NERC Standards and ERCOT Operating Guides and Protocols. GP&L System Operations use "Land Line and ERCOT Hotline" to communicate with ERCOT Real-Time Desk System Operators and follow ERCOT Real-Time Desk System Operators' Instructions / Operations Instructions for Real-Time Operation of the Transmission Facilities.

Other GP&L and DME staff, including Communications, Transmission Engineering, Energy Services, Transmission System Operations, or others will communicate with ERCOT by phone or email as needed, depending on the event.

9. Communicating with Critical Load Customers

Not applicable. TMPA does not have any retail customers and therefore no Critical Load Customers.

10. Communicating with Critical Fuel Suppliers

Not applicable. TMPA does not have any generation facilities nor does it provide direct electric service to any Critical Fuel Suppliers.

C. Plan to Maintain Pre-Identified Supplies for Emergency Response

1. Lists of Supplies

Supplies for Emergency response and generally identified in:

- Transmission Winter Weatherization Plan
- Transmission Summer Weatherization Plan

GP&L and DME shall Pre-Identify Supplies for Emergency Response according to their EOPs.

D. Staffing during Emergency Response

TMPA does not have any operational personnel.

Staffing shall be according to the GP&L and DME EOPs. Staffing during Emergency Response shall be as normal as the event allows, supplemented by contractors or other personnel as required.

E. Weather Related Hazards

1. Tornadoes

GP&L and DME Transmission personnel will monitor the forecasted weather and warnings leading up to an actual event.

If the system is impacted by a tornado, GP&L and/or DME personnel shall perform an initial damage assessment of the area. GP&L and DME personnel will begin the process to ensure safety is obtained by isolation and grounding devices on the system where needed. Once the area is deemed safe and secure by responding Emergency agencies, GP&L and DME personnel will begin repairing/replacing the portion(s) of the system that was damaged by the storm in a systematic manner to restore power to the largest number of customers first until all customers have been restored.

If the event appears major in scope, has significant loss of electric service, the GP&L EOP or DME EOP will be activated in accordance with their EOPs.

2. Hurricanes

TMPA does not have any assets located in a Hurricane Evacuation Zone.

3. Extreme Cold Weather

GP&L and DME personnel will monitor the forecasted weather and warnings leading up to an actual event. If the system is impacted by extreme cold weather, GP&L and DME personnel shall perform an initial damage assessment of the area. The GP&L and DME personnel will keep in constant communications with the appropriate Transmission Operators to respond to outages caused by the weather. GP&L and DME Transmission personnel will repair/replace the portion(s) of the system that was damaged by the weather in a systematic manner to restore power to the largest number of customers first until all customers have been restored.

Further responses for Extreme Cold Weather are detailed in the GP&L EOP and the DME EOP.

If the event appears major in scope, has significant loss of electric service, the GP&L EOP or DME EOP will be activated according to their plans.

4. Extreme Hot Weather

GP&L and DME personnel will monitor the forecasted weather and warnings leading up to an actual event. If the system is impacted by extreme hot weather, GP&L and DME personnel shall perform an initial damage assessment of the area. GP&L and DME will keep in constant communications with the appropriate Transmission Operators to respond to outages caused by the weather. GP&L and DME personnel will repair/replace the portion(s) of the system that was damaged by the weather in a systematic manner to restore power to the largest number of customers first until all customers have been restored.

Further responses for Extreme Hot Weather are detailed in the GP&L EOP and the DME EOP.

If the event appears major in scope, has significant loss of electric service, the GP&L EOP or DME EOP will be activated according to their plans.

5. Drought

GP&L and DME personnel will monitor the weather and the transmission systems during a drought event. Any potential risk that are identified from a drought situation will be identified and mitigation measure will be determine and implemented, if needed.

If the event appears major in scope, has significant loss of electric service, the GP&L EOP or DME EOP will be activated according to their plans.

6. Flooding

GP&L and DME personnel will monitor the forecasted weather and warnings leading up to an actual event. If the system is impacted by extreme flooding, GP&L and DME personnel shall perform an initial damage assessment of the area. GP&L and DME personnel will keep in constant communications with the appropriate Transmission Operator to respond to outages caused by the weather.

If the event appears major in scope or has significant loss of electric service, the GP&L EOP or DME EOP will be activated according to their plans.

F. EOP Implementation

1. Activation of EOP

Emergency situations are frequently discovered at the lower levels of an organization. It is anticipated that during many incidents that persons directly related to the event shall initiate a response to an event, i.e. a computer technician discovers malware on a cyber asset. Other events such as a pandemic may activate the EOP from the top down in anticipation of an impending event. As the event expands, the individuals involved shall continue to monitor the situation and request activation of the appropriate levels of the EOP.

In all events, only the portion of the EOP needed shall be activated.

The GP&L or DME EOPs will be activated if required.

II. TRANSMISSION AND DISTRIBUTION ANNEXES

A. Weather Emergency Annex

1. Cold Weather Emergency

a. Operational Plans

GP&L and/or DME personnel will monitor the forecasted weather and warnings leading up to an actual event. If the system is impacted by extreme cold weather, GP&L and/or DME Transmission personnel shall perform an initial damage assessment of the area. Transmission personnel will keep in constant communications with the appropriate Transmission Operators to respond to outages caused by the weather. Transmission personnel will repair/replace the portion(s) of the system that was damaged by the weather in a systematic manner to restore power to the largest number of customers first until all customers have been restored.

Specific operational plans are included in the GP&L and DME EOPs.

b. Checklist for Transmission and Distribution Facility Personnel

i. Lessons Learned from Past Weather Emergencies

This EOP is comprised of lessons learned from previous normal and emergency operations.

ii. Materials

Available materials at the GP&L and DME warehouses and primary/secondary vendors

iii. Fuel

Availability of fuel for transmission equipment

iv. Food and Water

- Check with local vendors for availability of food supply through the anticipated period of the event – if unavailable, ensure emergency food supply is adequate for a minimum of 72 hours
- Ensure drinking water supply is adequate for 72 hours

v. Boarding

Ensure there is adequate boarding accommodations for responding personnel

vi. Tools

Ensure tools and equipment are in proper working order and available to field personnel if/when needed

vii. PPE

Ensure PPE is readily available and within OSHA guidelines

2. Hot Weather Emergency

a. Operational Plans

GP&L and DME personnel will monitor the forecasted weather and warnings leading up to an actual event. If the system is impacted by extreme cold weather, transmission personnel shall perform an initial damage assessment of the area. GP&L and DME personnel will keep in constant communications with the applicable Transmission Operator to respond to outages caused by the weather. GP&L and DME transmission personnel will repair/replace the portion(s) of the system that was damaged by the weather in a systematic manner to restore power to the largest number of customers first until all customers have been restored.

Specific operational plans are included in the GP&L and DME EOPs.

b. Checklist for Transmission and Distribution Facility Personnel

TMPA does not have any operations personnel.

i. Lessons Learned from Past Weather Emergencies

This EOP is comprised of lessons learned from previous normal and emergency operations.

ii. Materials

Available materials at the GP&L and DME warehouses and primary/secondary vendors

iii. Fuel

Availability of fuel for transmission equipment

iv. Food and Water

- Check with local vendors for availability of food supply through the anticipated period of the event – if unavailable, ensure emergency food supply is adequate for a minimum of 72 hours
- Ensure drinking water supply is adequate for 72 hours

v. Boarding

Ensure there is adequate boarding accommodations for responding personnel

vi. Tools

Ensure tools and equipment are in proper working order and available to field personnel if/when needed

B. Load Shed Annex

1. Procedures for Controlled Shedding of Load

TMPA does not directly serve any customers and is not included in the ERCOT Load Shed plan.

2. Priorities for Restoring Shed Load to Service

TMPA does not directly serve any customers and is not included in the ERCOT Load Shed plan.

Since TMPA does not have any load to shed there are no loads to restore.

Load will be restored as directed by ERCOT.

3. Registry of Critical Load Customers

TMPA does not directly serve any retail customers and is not included in the ERCOT Load Shed plan. Therefore, the TMPA Registry of Critical Load Customers is a null list.

If TMPA had a list of Critical Load customers it would include:

a. hospitals,
b. police stations,
c. fire stations
d. critical water and wastewater facilities
e. customers with special in-house life-sustaining equipment
f. Critical Natural Gas Facility designated by the Railroad Commission of Texas
g. Critical Load Industrial Customers
h. Critical Load Public Safety Customers (a-d above)
i. Critical Care Residential Customers and Chronic Condition Residential Customers

This list shall be updated at least annually.

Residential customers dependent on electric-powered medical equipment, such as those designated as Chronic Condition or Critical Care, in accordance with PUCT rule §25.497, are encouraged to have a backup plan in the event they lose electricity should a localized outage or load shed event occur. It is important to note that these customers are not excluded from controlled outages and may lose power during a load shed event. Anyone who depends on electricity for life-sustaining equipment should have a backup plan in place.

It is the customer's responsibility to have alternative sources of electric power should a localized outage or load shed event occur.

4. Procedure to Maintaining an Accurate Registry of Critical Load Customers

TMPA does not directly serve any retail customers and is not included in the ERCOT Load Shed plan.

The TMPA list of Critical Loads is a null list. TMPA will maintain an accurate Registry of Critical Load Customers by maintaining an empty list.

C. Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic

TMPA does not have any operations or maintenance personnel.

The Pandemic section of the GP&L Emergency Operating Plan will be used for TMPA transmission assets operated by GP&L.

The Pandemic section of the DME Emergency Operating Plan will be used for TMPA transmission assets operated by DME.

D. Wildfire Annex

1. Response to Wildfire Emergencies

TMPA does not have any transmission assets operated or maintained by TMPA.

The Wildfire Annex section of the GP&L Emergency Operating Plan will be used for TMPA transmission assets operated by GP&L.

The Wildfire Annex section of the DME Emergency Operating Plan will be used for TMPA transmission assets operated by DME.

2. Mitigations of Hazards of Wildfire

TMPA does not have any transmission assets operated or maintained by TMPA.

The Wildfire Annex section of the GP&L Emergency Operating Plan will be used for TMPA transmission assets operated by GP&L.

The Wildfire Annex section of the DME Emergency Operating Plan will be used for TMPA transmission assets operated by DME.

E. Hurricane Annex

TMPA does not have any facilities located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management ("TDEM");

F. Cyber Security Incident

1. Cyber Security Incident Response

Upon confirmation of an incident, TMPA will begin its processes to investigate and assess the event data in order to classify and determine reportability of the event. The details of the investigation will be documented for historical forensic and possible reporting value.

TMPA does not have any transmission assets operated or maintained by TMPA.

The Cyber Security Incident section of the GP&L Emergency Operating Plan will be used for TMPA assets operated by GP&L.

The Cyber Security Incident section of the DME Emergency Operating Plan will be used for TMPA assets operated by DME.

G. Physical Security Incident

Upon notification of a physical security incident or threat, TMPA shall assess the particular situation, move to protect people first and then asset(s). TMPA will use a multi-step approach to assess the incident or threat and resolve the situation in a safe and expeditious manner. Response to a physical security incident depends on the nature of the situation. This is not a one solution fits all, but a guide since physical security incidents can vary significantly.

TMPA does not have any transmission assets operated or maintained by TMPA.

The Physical Security Incident section of the GP&L Emergency Operating Plan will be used for TMPA assets operated by GP&L.

The Physical Security Incident section of the DME Emergency Operating Plan will be used for TMPA assets operated by DME.

H. Facilities Leased or Operated under PURA §39.918(b)(1) or Procured, Owned, or Operated under PURA §39.918(b)(2)

TMPA does not have facilities leased or operated under PURA §39.918(b)(1) or procured, owned, or operated under PURA §39.918(b)(2).

III.GENERATION ANNEXES

TMPA does not own or operate any generation assets or facilities.

IV. DRILLS

Drills shall be conducted at least once each calendar year.

The PUCT Staff and TDEM shall be notified at least 30 days prior to the date(s) of any drills. Drills shall involve all departments that have an operational role in the Emergency Operations Plan.

Drills may be conducted in association with other drills, EOP-008 or GridEx as long as this EOP is exercised during the drill.

Drills may simulate the absence of personnel, such as simulating that a division Director is away and a lower level manager assuming their duties.

Since TMPA does not operate or maintain any transmission or generation assets, drills involving TMPA equipment will be included in the GP&L and DME drill conducted per their respective EOPs.

V.REPORTING REQUIREMENTS

GP&L and TMPA shall file an updated unredacted Emergency Operating Plans with ERCOT on June 1, 2022 and each February 15 beginning in 2023.

GP&L and TMPA shall file updated Emergency Operating Plan Summary and a redacted copy of the Emergency Operating Plan with the Public Utility Commission of Texas on June 1, 2022 and each March 15 beginning in 2023.

In accordance with the deadlines prescribed by paragraphs (1) and (3) of PUCT Rule 25.53(c), an entity must file with the commission the following documents:

(A) A record of distribution that contains the following information in table format:
  (i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and
  (ii) dates of access to or training on the EOP, as appropriate.

(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.

(C) An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:
  (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;
  (ii) the EOP has been reviewed and approved by the appropriate executives;
  (iii) drills have been conducted to the extent required by subsection (f) of this section;
  (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed;
  (v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
  (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.

Appendix A –PUCT §25.53 Electric Service Emergency Operations Plans

Public Utility Commission of Texas
§25.53 Electric Service Emergency Operations Plans.

(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).

(b) **Definitions.**

(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.

(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.

(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.

(4) **Entity** -- an electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.

(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.

(6) **Threat** -- the intention and capability of an individual or organization to harm life, 4 information, operations, the environment, or property, including harm to the 5 continuity of electric service.

(c) **Filing requirements.**

(1) An entity must file an emergency operations plan (EOP) and executive summary 9 under this section by April 15, 2022. Notwithstanding the foregoing, a municipally 10 owned utility must provide its EOP and executive summary in the manner 11 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.

(A) An entity must file with the commission:

(i) an executive summary that:
(a) describes the contents and policies contained in the EOP;
(b) includes a reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule; (c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and
(d) contains the affidavit required under subparagraph (c)(4)(C) of this section.
(ii) A complete copy of the EOP with all confidential portions removed.

(B) For an entity with operations within the ERCOT power region, the entity 6 must submit its unredacted EOP in its entirety to ERCOT.

(C) ERCOT must designate an unredacted EOP submitted by an entity as Protected Information under the ERCOT Protocols.

(D) An entity must make its unredacted EOP available in its entirety to commission staff on request at a location designated by commission staff.

(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:
(i) the executive summary required under subparagraph (c)(1)(A)(i) of this section identifies which sections of the joint EOP apply to each entity; and
(ii) the joint EOP satisfies the requirements of this section for each entity as if each entity had filed a separate EOP.

(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.

(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.

(2) A person seeking registration as a PGC or certification as a REP must meet the filing requirements under subparagraph (c)(1)(A) of this section 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.

(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:

(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:
(i) file with the commission an executive summary that:
(a) describes the changes to the contents or policies contained in the EOP;

(b) includes an updated reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule;
(c) includes the record of distribution required under subparagraph (c)(4)(A) of this section; and
(d) contains the affidavit required under subparagraph (c)(4)(C) of this section.

(ii) file with the commission a complete, revised copy of the EOP with all confidential portions removed; and

(iii) submit to ERCOT its revised unredacted EOP in its entirety if the entity operates within the ERCOT power region.

(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:

(i) a pleading that documents any changes to the list of emergency contacts as provided under subparagraph (c)(4)(B) of this section;

(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

(iii) the affidavit described under subparagraph (c)(4)(C) of this section.

(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.

(D) ERCOT must designate any revised unredacted EOP submitted by an entity as Protected Information under the ERCOT Protocols.

(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.

(F) The requirements for joint and combined filings under paragraph (c)(1) of this section apply to revised joint and revised combined filings under this paragraph.

(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:

(A) A record of distribution that contains the following information in table format:

(i) titles and names of persons in the entity's organization receiving access to and training on the EOP; and

(ii) dates of access to or training on the EOP, as appropriate.

(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.

(C) An affidavit from the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the following:

(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;

(ii) the EOP has been reviewed and approved by the appropriate executives;

(iii) drills have been conducted to the extent required by subsection (f) of this section;

(iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed;

(v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and

(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.

(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.

(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.

(1) An approval and implementation section that:

(A) introduces the EOP and outlines its applicability;

(B) lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;

(C) provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (c)(1) of this section;

(D) provides a dated statement that the current EOP supersedes previous EOPs; and

(E) states the date the EOP was most recently approved by the entity.

(2) A communication plan.

(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.

(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.

(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.

(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.

(3) A plan to maintain pre-identified supplies for emergency response.

(4) A plan that addresses staffing during emergency response.

(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.

(6) Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.

(e) **Annexes to be included in the emergency operations plan.**

(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:

(A) A weather emergency annex that includes:

(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

(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.

(B) A load shed annex that must include:

(i) Procedures for controlled shedding of load;

(ii) Priorities for restoring shed load to service; and

(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.

(C) A pandemic and epidemic annex;
(D) A wildfire annex;
(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);
(F) A cyber security annex;
(G) A physical security incident annex;
(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
(I) Any additional annexes as needed or appropriate to the entity's particular circumstances.

(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:
(A) A weather emergency annex that includes:
(i) operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;
(ii) verification of the adequacy and operability of fuel switching equipment, if installed; and
(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.
(B) A water shortage annex that addresses supply shortages of water used in the generation of electricity;
(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;
(D) A pandemic and epidemic annex;
(E) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
(F) A cyber security annex;
(G) A physical security incident annex; and
(H) Any additional annexes as needed or appropriate to the entity's particular circumstances.

(3) A REP must include in its EOP the following annexes:
(A) A pandemic and epidemic annex;
(B) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
(C) A cyber security annex;
(D) A physical security incident annex; and
(E) Any additional annexes as needed or appropriate to the entity's particular circumstances.

(4) ERCOT must include the following annexes:
- (A) A pandemic and epidemic annex;
- (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;
- (C) A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;
- (D) A cyber security annex;
- (E) A physical security incident annex; and
- (F) Any additional annexes as needed or appropriate to ERCOT's particular circumstances.

(f) **Drills.** 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.

(g) **Reporting requirements.** 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.

This agency certifies that the adoption has been reviewed by legal counsel and found to be a valid exercise of the agency's legal authority. It is therefore ordered by the Public Utility Commission of Texas that §25.53, electric service emergency operations planning, is hereby adopted with changes to the text as proposed.

Signed at Austin, Texas the _____ day of February 2022.

PUBLIC UTILITY COMMISSION OF TEXAS

_____ PETER LAKE, CHAIRMAN
_____ WILL MCADAMS, COMMISSIONER
_____ LORI COBOS, COMMISSIONER

This Emergency Operations Plan is considered CONFIDENTIAL and is FOR OFFICIAL USE ONLY by City of Garland, Fenton Municipal Electric and TMPA employees only. Any distribution to other than City of Garland, DME or TMPA personnel requires the approval of the TMPA General Manage or the GP&L Electric Regulatory Compliance Officer,

_____ JIMMY GLOTFELTY, COMMISSIONER

Appendix B – Texas Water Code §13.1396

Texas Water Code §13.1396

(a) In this section:

(1) "Affected utility" has the meaning assigned by Section 13.1395 .

(2) Repealed by Acts 2011, 82nd Leg., ch. 539, § 2.

(3) "Electric utility" means the electric transmission and distribution utility providing electric service to the water and wastewater facilities of an affected utility.

(4) "Retail electric provider" has the meaning assigned by Section 31.002, Utilities Code .

(b) An affected utility shall submit to the office of emergency management of each county in which the utility has more than one customer, the utility commission, and the office of emergency management of the governor a copy of:

(1) the affected utility's emergency preparedness plan approved under Section 13.1395 ; and

(2) the commission's notification to the affected utility that the plan is accepted.

(c) Each affected utility shall submit to the utility commission, each electric utility that provides transmission and distribution service to the affected utility, each retail electric provider that sells electric power to the affected utility, the office of emergency management of each county in which the utility has water and wastewater facilities that qualify for critical load status under rules adopted by the utility commission, and the division of emergency management of the governor:

(1) information identifying the location and providing a general description of all water and wastewater facilities that qualify for critical load status; and

(2) emergency contact information for the affected utility, including:

(A) the person who will serve as a point of contact and the person's telephone number;

(B) the person who will serve as an alternative point of contact and the person's telephone number; and

(C) the affected utility's mailing address.

(d) An affected utility shall:

(1) annually submit the information required by Subsection (c) to each electric utility that provides transmission and distribution service to the affected utility and to each retail electric provider that sells electric power to the affected utility; and

(2) immediately update the information provided under Subsection (c) as changes to the information occur.

(e) Each affected utility shall submit annually to each electric utility that provides transmission and distribution service to the affected utility and to each retail electric provider that sells electric power to the affected utility any forms reasonably required by an electric utility or retail electric provider for determining critical load status, including a critical care eligibility determination form or similar form.

(f) Not later than May 1 of each year, each electric utility and each retail electric provider shall determine whether the facilities of the affected utility qualify for critical load status under rules adopted by the utility commission.

(g) If an electric utility determines that an affected utility's facilities do not qualify for critical load status, the electric utility and the retail electric provider, not later than the 30th day after the date the electric utility or retail electric provider receives the information required by Subsections (c) and (d), shall provide a detailed explanation of the electric utility's determination to the affected utility and the office of emergency management of each county in which the affected utility's facilities are located.

VII. GP&L EOP (Redacted)

CONFIDENTIAL - FOR OFFICAL USE ONLY

City of Garland
Garland Power & Light

EMERGENCY OPERATIONS PLAN

Effective Date: May 2, 2022
This Plan supersedes all previous versions of the Emergency Operations Plan.

Approved: _____ 5/2/2022
Darrell Cline — Date of Approval

Title: General Manager and Chief Executive Officer

TABLE OF CONTENTS

TABLE OF CONTENTS 2
PREFACE 9
REVISIONS 9
I. EMERGENCY OPERATIONS PLAN 10
A. Approval and Implementation 10
1. Introduction 10
2. EOP Applicability 11
a. Major Storm 11
b. Energy Emergency Alert (EEA) 11
c. Extreme Cold Weather 12
d. Extreme Hot Weather 12
e. Black Start 12
f. Load Shed 12
g. Pandemic 12
h. Sabotage / Terrorism 12
i. Heightened Security 12
j. Extreme Temperature Events 12
k. Wildfire Events 12
l. Cyber Security Events 12
m. Physical Security Events 12
n. Water Shortage Emergency for Generation 12
o. Restoration of Service of Generation 13
3. Individuals Responsible for Maintaining and Implementing the EOP 13
a. Hierarchy of Responsibility 13
b. Maintenance of the EOP 13
c. Changing the EOP 13
d. Communications Personnel 13
e. Implementation of the EOP 13
4. Revision Control Summary 14
5. Supersedes Previous Versions 14
6. Date of Approval 14
7. Definitions 14
a. Annex 14
b. Black Start 14
c. Business Continuity Plan (“BCP”) 14
d. Chronic Condition Residential Customer 14
e. Control Center 15
f. Control Room 15
g. Critical Load 15
h. Critical Load Public Safety Customer 15

i. Critical Load Industrial Customer 15
j. Critical Care Residential Customer 15
k. Critical Natural Gas Facility 15
l. Critical Water or Wastewater Customer 15
m. Drill 16
n. Electronic Security Perimeter (ESP) 16
o. Emergency 16
p. Emergency Operations Plan 16
q. Entity 16
r. ERCOT Emergency Condition 16
s. ERCOT Energy Emergency Alert (EEA) 16
t. Flooding Event 16
u. General Hospital 16
v. Hazard 17
w. Heightened Security 17
y. Natural Disaster 17
z. Pandemic 17
aa. Physical Security Perimeter (PSP) 17
bb. Resource 17
cc. Sabotage 17
dd. Special Hospital - 18
ee. Threat - 18
8. Filing Requirements 18
9. How to Use This EOP 19
10. Essential Functions of GP&L 20
B. Communications Plan 21
1. Handling Complaints 21
2. Communicating with the Public 22
3. Communicating with the Media 22
4. Communicating with the Customers 22
5. Communicating with the Public Utility Commission of Texas (PUCT) 23
6. Communicating with the Office of Public Utility Council (OPUC) 23
7. Communicating with Local and State Governmental Entities, Officials and Emergency Operations Centers 23
8. Communicating with ERCOT 23
9. Communicating with Critical Load Customers 24
10. Communicating with Critical Fuel Suppliers 24
C. Plan to Maintain Pre-Identified Supplies for Emergency Response 24
1. Lists of Supplies 24
2. GP&L Transmission and Distribution 24
3. GP&L System Operations 24
4. GP&L Communications 25

D. Staffing during Emergency Response 25
1. GP&L Transmission and Distribution (T&D) 25
2. GP&L System Operations 25
3. GP&L Communications 25
E. Weather Related Hazards 26
1. Tornadoes 26
2. Hurricanes 26
3. Extreme Cold Weather 26
4. Extreme Hot Weather 26
5. Drought 27
6. Flooding 27
F. EOP Implementation 28
1. Activation of EOP 28
II. TRANSMISSION AND DISTRIBUTION ANNEXES 29
A. Weather Emergency Annex 29
1. Cold Weather Emergency 29
a. Operational Plans 29
i. Weather Awareness 29
ii. Weather Preparedness 30
b. Checklist for Transmission and Distribution Facility Personnel 31
i. Lessons Learned from Past Weather Emergencies 31
ii. Materials 31
iii. Fuel 31
iv. Food and Water 31
v. Boarding 31
vi. Tools 31
vii. PPE 31
c. Pre and Post-Weather Emergency Meetings 31
2. Hot Weather Emergency 33
a. Operational Plans 33
b. Checklist for Transmission and Distribution Facility Personnel 33
i. Lessons Learned from Past Weather Emergencies 33
ii. Materials 33
iii. Fuel 33
iv. Food and Water 33
v. Boarding 33
vi. Tools 34
vii. PPE 34
c. Pre and Post-Weather Emergency Meetings 34
B. Load Shed 36
1. Procedures for Controlled Shedding of Load 36
a. Procedure for Controlled Shedding Firm Load 36

b. Rotating Blackouts 36
c. Planned Interruptions See "IRO-017 Outage Coordination Procedure" 37
d. Underfrequency Load Shedding 37
e. High-Set Underfrequency Load Shedding 37
2. Priorities for Restoring Shed Load to Service 37
a. Generation Facilities 37
b. Gas Compressor Stations 38
c. Electric Utility Facilities 38
i. Control Centers 38
ii. Substations 38
iii. City Customer Service facilities 38
iv. Other facilities 38
d. Critical Loads 38
e. Critical Load Customers not identified above 39
f. Communications Facilities 39
3. Registry of Critical Load Customers 39
a. hospitals, ... 39
b. police stations, ... 39
c. fire stations 39
d. critical water and wastewater facilities 39
e. customers with special in-house life-sustaining equipment 39
f. Critical Natural Gas Facility designated by the Railroad Commission of Texas 39
g. Critical Load Industrial Customers 39
h. Critical Load Public Safety Customers 39
i. Critical Care Residential Customers and Chronic Condition Residential Customers 39
4. Procedure to Maintaining an Accurate Registry of Critical Load Customers 40
a. Procedure for Adding Customers to Registry of Critical Load Customers 40
i. Procedure for Adding Hospitals 40
ii. Procedure for Adding Police Stations 40
iii. Procedure for Adding Fire Stations 40
iv. Procedure for Adding Critical Water and Wastewater Facilities 41
v. Procedure for Adding Customers with Special In-House Life-Sustaining Equipment 41
vi. Procedure for Adding Critical Natural Gas Facility designated by the Railroad Commission of Texas 42
vii. Procedure for Adding Critical Load Industrial Customers 42
viii. Procedure for Adding Critical Load Public Safety Customers (a-d above) 42
ix. Procedure for Adding Critical Care Residential Customers and Chronic Condition Residential Customers 43
x. Procedure for Removing Critical Load Customers from the List 43
b. Annual Update of List of Critical Load Customers 44

c. Process for Providing Assistance to Critical Load Customers in the Event of an Unplanned Outage 44
d. Communicating with Critical Load Customers During an Emergency 44
e. Coordinating with Government and Service Agencies During an Emergency 45
f. Training Staff with Respect to Serving Critical Load Customers 45
C. Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic 46
1. Overview 46
2. Conditions to Activate the Pandemic Plan 46
a. Determination 46
b. Implementation 46
c. Modifications to Sick Leave Policy 47
d. Telecommuting 47
3. Pandemic Preparedness Action Levels 47
a. Level 1 – Precautionary Measures 47
b. Level 2 - Reduce exposure to critical operations personnel 47
c. Level 3 – Maintain Critical Business Operation Only 48
d. Level 4 – Facility Lockdown 48
4. Transmission Operations Center Implementation 49
a. Implementation 49
b. Departmental Responsibilities 49
5. Distribution 49
a. Implementation 49
b. Distribution Administrative Personnel 50
c. Distribution Coordinators and Lead Personnel 50
6. Energy Services 50
a. Implementation 50
b. Departmental Responsibilities 50
7. GP&L Accounting and Budget 50
a. Essential Contact Information 50
b. Administrative 51
c. Wires and Accounts Payable ("AP") Payments 51
d. Wholesale Customer Billing 51
e. Cash Management 52
f. Payroll 52
g. Budget 52
h. Workforce Management ("WFM") and Geographic Information System ("GIS") 52
8. Personnel – Remote / Non-Remote 52
D. Wildfire Annex 53
1. Response to Wildfire Emergencies 53
2. Mitigations of Hazards of Wildfire 53
E. Hurricane Annex 55
F. Cyber Security Incident 56

1. Cyber Security Incident Response 56
2. Declare Incident 56
3. Determine Investigation Scope 57
4. Collect and Preserve Data 57
5. Perform Technical Analysis 57
   a. Correlate Events and Document Timeline 57
   b. Identify Anomalous Activity 58
   c. Identify Root Cause and Enabling Conditions 59
   d. Gather Incident Indicators 59
   e. Analyze for Common Adversary TTPs 59
   f. Validate and Refine Investigation Scope 59
6. Third-Party Analysis Support (if needed): 60
7. Adjust Tools: 60
8. Containment 60
   a. Considerations 60
   b. Containment Activities 61
   c. Key containment activities include: 61
9. Eradication 61
   a. Execute Eradication Plan 61
   b. Eradication Activities 62
10. Recover System(s) and Services 62
11. Post-Incident Activities 63
12. Adjust Sensors, Alerts, and Log Collection 63
13. Reporting 63
   a. Cyber Security Incident Response (Reporting) 63
      i. "Cyber Security Incident" is defined by NERC as: 63
      ii. "Reportable Cyber Security Incident" is defined by NERC as: 63
   b. Reporting to DOE under OE-417 64
   c. Cyber Security Incident Determination and Reportability (Reporting) 64
   c. Criteria to determine Cyber Security Incident Reportability (Reporting) 64
   d. Cyber Security Incident Classification (Reporting) 64
   e. Cyber Security Incident Response Team (Reporting) 65
   f. Cyber Security Incident Response Plan (Reporting) 65

G. Physical Security Incident 66
1. Notification 66
2. Assessment 66
3. Response 67
4. Follow up Actions 68
5. Physical System(s) Recovery 68
6. Post-Incident Documentation should include: 68
7. Reporting 69

H. Facilities Leased or Operated under PURA §39.918(b)(1) or Procured, Owned, or Operated under PURA §39.918(b)(2) 70
III. GENERATION ANNEXES 71
A. Weather Emergency Annex 71
1. Cold Weather Emergency 71
a. Operational Plans 71
b. Procedure 71
c. Verification of the Adequacy and Operability of Fuel Switching Equipment 74
d. Checklist for Generation Facility Personnel 74
e. Pre- and Post-Weather Emergency Meetings 74
2. Hot Weather Emergency 75
a. Operational Plans 75
b. Procedure 75
c. Verification of the Adequacy and Operability of Fuel Switching Equipment 77
d. Checklist for Generation Facility Personnel 77
e. Pre and Post-Weather Emergency Meetings 77
B. Water Shortage Emergency Annex 78
1. Low lake level 78
2. Demineralized water storage 78
3. Effluent make-up water 78
C. Restoration of Service Annex 79
1. Purpose 79
2. Scope 79
3. Process 79
D. Pandemic and Endemic Annex 80
E. Hurricane Annex 81
F. Cyber Security Annex 82
G. Physical Security Annex 83
IV. DRILLS 84
V. REPORTING REQUIREMENTS 85
Appendix A –PUCT §25.53 Electric Service Emergency Operations Plans 87
Appendix B – City of Garland Pandemic Response Directive 95
Appendix C - Texas Water Code §13.1396 100
Appendix D – Application for Chronic Condition or Critical Care Residential Customer Status 102
Appendix E – Application for Critical Load Public Safety or Industrial Customer Status 104

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PREFACE

Garland Power & Light (GP&L) has developed this Emergency Operations Plan to assist in responding to emergency conditions affecting the electric system.

GP&L's philosophy is that employees need to retain their normal responsibilities as much as possible during an emergency. However, all employees are required to familiarize yourself with all of the contents of this plan so that you can quickly access the information you need in an emergency and to anticipate actions that will be taken by others.

REVISIONS

Revision	Date	Change
0	4/2009	Original in this Format (Replaces previous EOPs)
1	3/2011	Updated with Cold Weather Actions
2	2/28/2012	Annual Update, updated Table of Contents
3	1/29/2013	Annual Update, Updated Production Weatherization Plan
4	1/7/2015	Annual Update
5	3/3/2016	Annual Update
6	3/25/2020	Update – Added Section II, expanded pandemic section
7	5/2/2022	Update – Reformatted and added new Annexes per PUCT 25.53

I. EMERGENCY OPERATIONS PLAN

A. Approval and Implementation

1. Introduction

The purpose of the Garland Power & Light Emergency Operations Plan ("EOP") is to better enhance the preparation, management and recovery of the organization from emergency events. It has been established to coordinate continued operations during times of emergency including timely restoration of electrical service to Garland Power & Light ("GP&L") customers while maintaining safe, orderly working practices and minimizing customer difficulty in the event of a major outage. Available resources will be coordinated so as to maintain service, prevent damage to existing facilities and restore service to customers that have service interruptions.

The EOP designates operational responsibilities within GP&L and complies with the City of Garland Emergency Operations Plan to safeguard the continuity of the City of Garland Government.

The objectives of this EOP are to:

1. Protect the continuity of electric service within the service area by providing an emergency plan to be implemented when there is a forecast or occurrence of events that affect system security.

2. Support the timely and orderly restoration of electric service following disruptions.

3. Protect the safety of GP&L employees and the public during and after emergency operations.

4. Support compliance by GP&L operations during emergency conditions comply with all local, state, and federal regulations and policies as well as all contractual agreements.

5. Maintain communications with GP&L customers to determine service conditions, communicate expected actions and service expectations, and request actions from customers.

6. Inform and coordinate actions and resources between government agencies and regulatory agencies such as the City of Garland Emergency Operation Center, the Public Utility Commission of Texas ("PUCT"), North American Electric Reliability Corporation ("NERC"), Federal Energy Regulatory Commission ("FERC"), City Public Safety agencies and the Federal Bureau of Investigation ("FBI").

7. Inform and coordinate actions and resources with the Electric Reliability Council of Texas ("ERCOT").

2. EOP Applicability

All employees 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.

This EOP applies to all GP&L facilities and employees, including office facilities, and the portion of TMPA operated and maintained by GP&L.

GP&L is the municipally-owned and operated electric utility of the City of Garland ("City" or "Garland"). This EOP applies to all Garland applicable business functions performed by Garland Power & Light under NERC registrations, Joint Registration Agreements, Coordinated Functional Registration Agreements, Delegation Agreements, or Transmission Agreements. The City, Garland, and GP&L are used interchangeably within this document but mean and refer to the City of Garland.

[redacted]

The EOP applies to the following operational situations:

a. **Major Storm** – a period of high incidence of outages from the failure of electric transmission and distribution facilities due to trees or other object coming into contact with electric facilities during periods of high winds or icy conditions

b. **Energy Emergency Alert (EEA)** - An orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an operating condition in which the safety or reliability of the ERCOT electric grid is compromised or

threatened, as determined by ERCOT while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System

c. **Extreme Cold Weather** – a period of extreme cold weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

d. **Extreme Hot Weather** - a period of extreme hot weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

e. **Black Start** – restoration of electric service when all or a major portion of the ERCOT electric grid has lost service

f. **Load Shed** – the intentional removal and restoration of firm load customers at the direction of ERCOT, generally in response to a system emergency.

g. **Pandemic** – a period when resources, including personnel, may be limited due to widespread disease or other conditions where the limited physical contact between employees and between employees and the public should be maintained

h. **Sabotage / Terrorism** – response to an act or anticipated act of sabotage or terrorism directed at TMPA Transmission facilities or GP&L facilities

i. **Heightened Security** – a period of increased security due to elevated threat level

j. **Extreme Temperature Events** – Weather events that are beyond the normal anticipated climate for the GP&L or TMPA service territory

k. **Wildfire Events** – a grass or forest fire that has the ability to reduce the quality of electric service to consumers by damaging, degrading or contaminating electric utility facilities

l. **Cyber Security Events** – an intentional cyber-attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

m. **Physical Security Events** – an intentional physical attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers

n. **Water Shortage Emergency for Generation** – a period when there is a shortage of water to provide cooling for generating units

o. **Restoration of Service of Generation** – the tripping or failure to start of a generating unit during a period when there is or is expected to be a shortage of generation within the ERCOT electric grid

3. Individuals Responsible for Maintaining and Implementing the EOP

a. Hierarchy of Responsibility

This section describes personnel responsibilities during an emergency. The philosophy of the EOP is to maintain the existing organizational structure and duties as much as possible during an emergency so that personnel have as little adjustment as possible in transitioning to their emergency roles. However, depending on the nature of the emergency and the availability of key personnel, some changes in the normal organizational structure may be implemented.

b. Maintenance of the EOP

The EOP shall be reviewed and updated, if needed, at least once each calendar year. The Electric Regulatory Compliance Officer shall coordinate the revision efforts and shall present any revisions to GP&L's Directors for review.

c. Changing the EOP

If there are changes that are approved, the EOP shall be signed by one or more officers of GP&L to indicate approval.

d. Communications Personnel

GP&L's General Manager/Chief Executive Officer ("CEO") or Communication Manager is responsible for issuing communications on the status of the emergency using appropriate communication channels. The information provided by personnel in the field, operations or ERCOT to the CEO and Communication Manager will be used to create message content. To ensure consistent, accurate, coordinated and controlled reporting of information to the media, public and employees, no information should be released except through the CEO or the Communications Manager or their designees.

e. Implementation of the EOP

The EOP is a collection of actions that cover many scenarios. It covers preparatory actions as well as responsive actions. The EOP may be invoked by any GP&L Director or above for actions or preparation of actions related to applicable situations within their division. Activation of the EOP in one division does not necessarily indicate activation of the plan for all divisions within GP&L. Only the portion of the EOP required for reliable operations needs to be invoked. For instance, a low water emergency at a power plant may not need to invoke special actions by the distribution division. As another example a wildfire emergency in one part of the state may not affect GP&L personnel in other parts of the state.

As multiple divisions within GP&L activate the EOP, coordination of actions between the divisions shall be through normal reporting channels.

4. Revision Control Summary

All official versions of the EOP shall be documented in a Revision Control table. The table shall identify the version number, a summary of significant changes, and the effective date of the version.

5. Supersedes Previous Versions

This version of the EOP supersedes all previous version of this EOP as of the effective date of this plan.

6. Date of Approval

The date of approval of the EOP shall be the latest date an officer of GP&L signs the cover page of this EOP.

The effective date of the plan shall be identified on the cover page and may be any date after the approval date of the plan or up to 30 days prior to the approval date.

7. Definitions

a. **Annex** -- a section of an emergency operations plan or business continuity plan that addresses how an entity plans to respond to the incidence of a specific hazard or threat.

b. **Black Start** - the recovery from a blackout of a complete or significant portion of the ERCOT electric grid.

c. **Business Continuity Plan ("BCP")** – the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in the recovery from an emergency.

d. **Chronic Condition Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to prevent the impairment of a major life function through a significant deterioration or exacerbation of the person's medical condition. If that serious medical condition is diagnosed or re-diagnosed by a physician as a life-long condition, the designation is effective under this section for the shorter of one year or until such time as the person with the medical condition no longer resides in the home. Otherwise, the designation or re-designation is effective for 90 days.

e. **Control Center** - One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.

f. **Control Room** – A facility from which operating personnel are able to monitor and control substation or generation equipment located at a single geographic location. Control may be of more than one generating unit or substation as long as they are located at a single geographic location.

g. **Critical Load** - load for which electric service is considered crucial for the protection or maintenance of public health and safety; including but not limited to Critical Load Public Safety Customers, Critical Load Industrial Customer, Chronic Condition Residential Customer, Critical Care Residential Customer, customers with special in-house life-sustaining equipment, Critical Natural Gas Facilities and Critical Water or Wastewater Customers.

h. **Critical Load Public Safety Customer** - a customer for whom electric service is considered crucial for the protection or maintenance of public safety, including but not limited to hospitals, police stations, fire stations, and critical water and wastewater facilities.

i. **Critical Load Industrial Customer** - an industrial customer for whom an interruption or suspension of electric service will create a dangerous or life-threatening condition on the retail customer's premises, is a "critical load industrial customer."

j. **Critical Care Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or redesignation is effective for two years under PUCT Rule 25.53.

k. **Critical Natural Gas Facility** - a facility designated as a critical customer by the Railroad Commission of Texas under §3.65(b) (relating to Critical Designation of Natural Gas Infrastructure) unless the facility has obtained an exception from its critical status. Designation as a critical natural gas facility does not guarantee the uninterrupted supply of electricity.

l. **Critical Water or Wastewater Customer** – a water utility facility that has submitted an annual application for designation as a Critical Water of Wastewater customer and has been granted such by the electric utility under TWC §13.1396.

m. Drill - an operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.

n. Electronic Security Perimeter (ESP) – the logical border surrounding a network to which Cyber Systems are connected using a routable protocol.

o. Emergency - any incident resulting from an imminent hazard or threat that endangers life or property or presents credible risk to the continuity of electric service. The term includes an emergency declared by local, state, or federal government; ERCOT; or a NERC Reliability Coordinator that is applicable to the entity.

p. Emergency Operations Plan - the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in response to an emergency.

q. Entity- an electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.

r. ERCOT Emergency Condition - An operating condition in which the safety or accountability of the ERCOT system is compromised or threatened, as determined by ERCOT.

s. ERCOT Energy Emergency Alert (EEA) - an orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an ERCOT Emergency Condition while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System.

t. Flooding Event – an event where an overflow of water submerges dry land which is normally dry and causes roadways and bridges to become impassable.

u. General Hospital – under Texas Health and Safety Code §241.003(5) means an establishment that:
(A) offers services, facilities and beds for use for more than 24 hours for two or more unrelated individuals requiring diagnosis, treatment, or care for illness, injury, deformity, abnormality, or pregnancy, and
(B) regularly maintains, at a minimum, clinical laboratory services, diagnostic X-ray services, treatment facilities including surgery or obstetrical care or both, and other definitive medical or surgical treatment of similar extent.

v. **Hazard** – a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property.

w. **Heightened Security** - For the purposes of this document Heightened Security is defined as a condition in which a specific or non-specific threat has been identified against the City of Garland electric utility assets or personnel. This may be a physical threat or a cyber threat.

x. **Hospital** - Texas Health and Safety Code §241.003(7) defines Hospital as a General Hospital or a Special Hospital.

y. **Natural Disaster** – a major adverse event resulting from natural processes of the earth; examples include floods, tornados, earthquakes, tsunamis, and other geologic processes. A natural disaster can cause loss of life or property damage, and typically leaves some economic damage in its wake, the severity of which depends on the affected population's resilience or ability to recover.

z. **Pandemic** – a widespread disease that has the potential to affect the health and ability of the workforce to function normally.

aa. **Physical Security Perimeter (PSP)** – the physical barrier surrounding locations in which Cyber Assets, Cyber Systems or Electronic Access Control or Monitoring Systems reside, and for which access is controlled.

bb. **Resource** – an energy storage resource, a generation resource or a load resource.

cc. **Sabotage** – The GP&L procedures define Sabotage as:

- Destruction of an employer's property (as tools or materials) or the hindering of manufacturing by discontented workers.
- Destructive or obstructive action carried on by a civilian or enemy agent to hinder a nation's war effort.
- An act or process tending to hamper or hurt.
- Deliberate subversion.

Acts of sabotage may be carried out in many different ways. For an incident to be considered an act of sabotage there will be an underlying intent by a person to disrupt, obstruct, hamper, destroy, or hurt people or property.

- If a person loses control of their vehicle and runs into a utility pole, that is an accident.
- If a person cuts down a utility pole with a chain saw, that is sabotage.
- If an employee working mistakenly deletes a computer file that is an accident.

- If an employee places a Trojan horse in the City's computer system, that is sabotage.

dd. Special Hospital - per Texas Health and Safety Code §241.003(15) means an establishment that:
(A) offers services, facilities, and beds for use for more than 24 hours for two or more unrelated individuals who are regularly admitted, treated, and discharged and who require services more intensive than room, board, personal services, and general nursing care;
(B) has clinical laboratory facilities, diagnostic X-ray facilities, treatment facilities, or other definitive medical treatment;
(C) has a medical staff in regular attendance; and
(D) maintains records of the clinical work performed for each patient.

ee. Threat - the intention and capability of an individual or organization to harm life, information, operations, the environment, or property.

8. Filing Requirements

a. A municipal utility must file an EOP under PUCT Rule §25.53 by June 1, 2022. Beginning in 2023, an entity must annually file an EOP no later than March 15 in the manner prescribed by the PUCT.
   i. An entity must file with the PUCT an Executive Summary of the EOP.
   ii. An entity must file with the PUCT a redacted copy of the EOP.
   iii. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.
   iv. Beginning in 2023, the annual EOP must include, for each incident in the prior calendar year that required the entity to activate its EOP, a summary after-action report that includes lessons learned and an outline of changes the entity made to the EOP as a result.

b. A person seeking registration as a power generation company ("PGC") or certification as a retail electric provider ("REP") must file an EOP with the PUCT 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 PUCT approves the person's certification or registration.

c. Updated filings. An entity must file an updated EOP with the PUCT within 30 days under the following circumstances.
   i. An entity must file an updated EOP if PUCT staff determines that the entity's EOP on file does not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency.

ii. An entity must file an updated EOP in response to feedback provided from PUCT staff.
iii. An entity must file an updated EOP if the entity makes a significant change to its EOP. A significant change to an EOP includes a change that has a material impact on how the entity would respond to an emergency. The entity must file the updated EOP with the commission no later than 30 days after the change takes effect.
iv. An entity with operations within the ERCOT power region must submit its updated EOP under paragraphs (c)(4)(A), (c)(4)(B), and (c)(4)(C) to ERCOT within 30 days of filing the updated EOP with the PUCT.

9. How to Use This EOP

This EOP may be used as a guideline to indicate general actions and responsibilities for various functions within GP&L. Where this EOP conflicts with other operational documents, such as City Directives, the policies and procedures developed for compliance with NERC, ERCOT or environmental regulations, those documents shall govern. This EOP is ONLY for general reference and to assist each division to understand the overall anticipated actions of the various divisions within GP&L.

This EOP is divided into twelve parts:

Approval and Implementation
Communications Plan
Plan to Maintain Pre-Identified Supplies for Emergency Response
Staffing During Emergency Response
Weather Related Hazards
Other Emergencies
EOP Implementation
Drills
Reporting Requirements
Transmission and Distribution Annexes
Generation Annexes
Appendices

The twelve-part structure is designed to allow easy access to needed information before and during an emergency.

Emergency Preparedness refers to all activities that occur prior to an actual emergency.

A Business Continuity Plan covers those actions following the termination of the Emergency designation until all customers have been restored, all affected equipment inspected and necessary repairs made and full normal operations have resumed.

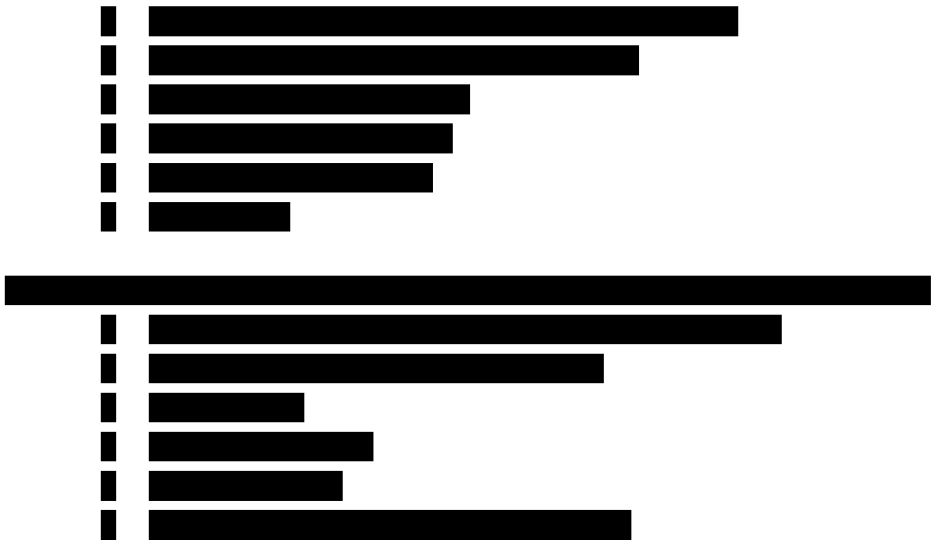
Section I – Emergency Operations Plan, provides the background information to implement the EOP quickly in an emergency.

Emergency activities begin with the decision to implement the EOP and ends with the conclusion of post event activities such as storage of emergency equipment, cost accounting, post event documentation and lessons learned.

Section II – Transmission and Distribution Annexes and Section III Generation Annexes contains quick reference lists and procedures that can be accessed and scanned quickly during an emergency.

10. Essential Functions of GP&L

The essential function of GP&L shall be to maintain reliable electric service to its retail electric customers and to its transmission interconnection points. While operating to maintain the integrity of the ERCOT Grid. This can be divided into the following required subfunctions:



Each GP&L Director shall designate the essential functions within their division of responsibility and the necessary positions to maintain those functions under the current conditions of the EOP. Particular attention should be focused on determining the minimum level of personnel required for each function under various emergency conditions. For instance, the level of staffing of the Distribution division will be significantly different during a weather emergency than during a pandemic.

Directors shall determine the personnel within their division and throughout GP&L that can perform those functions, including qualified personnel that have transferred or retired, if practical. Directors shall also consider the consolidation of functions/positions within GP&L such as the consolidation of the Transmission and Distribution Control Center with the Generation Control Center or the consolidation of the Transmission and Distribution field crews, recognizing that the transferred personnel may not be able to perform all of the functions but may free up personnel qualified for other tasks.

During a Pandemic, Directors shall determine which positions which can be performed remotely. To the extent possible non-essential work, such as preventive maintenance and new construction shall be postponed. If such activities are required to maintain reliable service, they should continue. Directors shall consider rotating shifts for Transmission, Substation and Distribution field crews to have the fewest number exposed. Such rotation should be considered on a two-week or longer rotation. To the extent possible crews should maintain social distancing.

B. Communications Plan

1. Handling Complaints

Complaints shall continue to be handled by the City's Customer Service department as in normal conditions during normal business hours and by GP&L's System Operators during hours when Customer Service is closed.

Outage calls will continue to be handled by Customer Service as in normal conditions during normal business hours and by System Operators during hours when Customer Service is closed. When the volume of calls shall exceed the capacity of available operators, the outage telephone calls shall be answered by an integrated voice response (IVR) system.

Complaints received in GP&L's general email box (info@gpltexas.org) will be handled during normal business hours by GP&L's Management Services Coordinator or their designee.

2. Communicating with the Public

GP&L Communications under the direction of the CEO and in coordination with the City's Public & Media Relations Department can conduct public communications through several channels, including, but not limited to:

- GP&L website – gpltexas.org
- City website – GarlandTx.gov
- Garland Alert System
- Social Media
- News Releases
- City e-newsletters
- Customer Service Department Call Center

Channel selection will be determined by the potential reach and effectiveness for the event. Communication messages will be tailored to the event and selected channels. Message frequency will vary, depending on the selected channels and event.

3. Communicating with the Media

GP&L's public communications as noted in the preceding Section I B.2. "Communicating with the Public" are available to media. GP&L's Communications Manager is the primary media contact and designated spokesperson. Alternate media contacts are the GP&L Communications Specialist or the City's Public Information Officer. Subject matter experts within GP&L may be designated to speak with media, depending on the topic.

4. Communicating with the Customers

Communications with GP&L's retail customers is covered in Section I.B.2. "Communicating with the Public."

GP&L's large retail customers will be contacted by GP&L Commercial Accounts Administrator by phone or email as needed, depending on the event.

GP&L's wholesale customers will be contacted by GP&L Qualified Scheduling Entity (QSE) by phone or email as needed, depending on the event.

5. Communicating with the Public Utility Commission of Texas (PUCT)

GP&L will communicate with the PUCT by phone or email as needed, depending on the event. GP&L's CEO, Deputy General Manager/Chief Operating Officer ("COO") and Transmission Services Director are the PUCT emergency contacts.

GP&L Communications will notify the PUCT by email of significant outages as defined by 16 TAC §25.52(c)(5).

6. Communicating with the Office of Public Utility Council (OPUC)

GP&L public communications as noted in section I.B.2. "Communicating with the Public" are available to the Office of Public Utility Counsel ("OPUC"). OPUC can contact GP&L Communications Manager with any inquiries.

7. Communicating with Local and State Governmental Entities, Officials and Emergency Operations Centers

During emergency operations affecting service to City facilities, a significant number of retail customers or requiring coordination with other City departments, GP&L shall coordinate and cooperate with other City departments through the City's Office of Emergency Management.

During minor events this communication should generally be through the GP&L Communications Manager or GP&L CEO or their designees. In more significant events which require the activation of the City's Emergency Operations Center ("EOC"), GP&L shall designate one or more persons to represent GP&L at the City of Garland EOC. Upon appointment of the GP&L representatives, communications with the EOC should go through the appropriate EOC representatives.

The City's Office of Emergency Management will communicate with other local and state government entities, officials and emergency operations centers.

8. Communicating with ERCOT

The GP&L Transmission Operations Center and the GP&L Energy Services Operations Center shall continue regular communications with ERCOT as outlined in the NERC Standards and ERCOT Operating Guides and Protocols. GP&L System Operations use "Land Line and ERCOT Hotline" to communicate with ERCOT Real-Time Desk System Operators and follow ERCOT Real-Time Desk System Operators' Instructions / Operations Instructions for Real-Time Operation of the Transmission Facilities.

Other GP&L staff, including Communications, Transmission Engineering, Energy Services, Transmission System Operations, or others will communicate with ERCOT by phone or email as needed, depending on the event.

9. Communicating with Critical Load Customers

GP&L's Commercial Account Administrator or their designee will communicate with Critical Load commercial customers by phone or email as needed, depending on the event.

Communication with Critical Load Residential Customers will primarily be through the website and social media. Customer Service will continue to receive calls from all customers and relay messages to GP&L.

10. Communicating with Critical Fuel Suppliers

GP&L's Energy Services Operations Center will communicate with critical fuel suppliers by phone or email as needed, depending on the event.

C. Plan to Maintain Pre-Identified Supplies for Emergency Response

1. Lists of Supplies

[redacted]

2. GP&L Transmission and Distribution

[redacted]

3. GP&L System Operations

[redacted]

4. GP&L Communications

[redacted]

D. Staffing during Emergency Response

Staffing during Emergency Response shall be as normal as the event allows, supplemented by contractors or other personnel as required.

Personnel will generally be expected to perform their duties at their normal work location. Certain conditions may require that employees operate from a remote location. Those that are able to perform their work duties remotely may be granted permission to work remotely.

1. GP&L Transmission and Distribution (T&D)

- [redacted]

2. GP&L System Operations

- [redacted]

3. GP&L Communications

- [redacted]

E. Weather Related Hazards

1. Tornadoes

[redacted]

2. Hurricanes

[redacted]

3. Extreme Cold Weather

[redacted]

4. Extreme Hot Weather

[redacted]

[redacted]

5. Drought

[redacted]

6. Flooding

[redacted]

- [redacted]

F. EOP Implementation

1. Activation of EOP

Emergency situations are frequently discovered at the lower levels of an organization. It is anticipated that during many incidents that persons directly related to the event shall initiate a response to an event, i.e. a computer technician discovers malware on a cyber asset. Other events such as a pandemic may activate the EOP from the top down in anticipation of an impending event. As the event expands, the individuals involved shall continue to monitor the situation and request activation of the appropriate levels of the EOP.

In all events, only the portion of the EOP needed shall be activated.

While it is recognized that many smaller events or conditions may activate individual portions of the EOP without affecting multiple divisions within GP&L there are events that will impact multiple divisions within GP&L or may need to be coordinated with the City and the City's Office of Emergency Management. When this occurs, GP&L will activate the appropriate portions of the EOP and coordinate the affected divisions through a Department Command Structure.

Unless modified by the City and/or the GP&L CEO or COO, reporting and authorities shall remain as before the activation of the EOP and this EOP shall supplement the existing organization

The operations of the multiple GP&L divisions will be coordinated through the Departmental Command Structure. The operations of GP&L shall reside in the GP&L COO or his designee. Each division shall continue to perform their section of the EOP and report and coordinate through the COO.

II. TRANSMISSION AND DISTRIBUTION ANNEXES

A. Weather Emergency Annex

1. Cold Weather Emergency

a. Operational Plans

[redacted]

[redacted]

i. Weather Awareness

[redacted]

[redacted]

ii. Weather Preparedness

b. Checklist for Transmission and Distribution Facility Personnel

i. Lessons Learned from Past Weather Emergencies

[redacted]

ii. Materials

[redacted]

iii. Fuel

[redacted]

iv. Food and Water

[redacted]

v. Boarding

[redacted]

vi. Tools

[redacted]

vii. PPE

[redacted]

c. Pre and Post-Weather Emergency Meetings

Transmission and Distribution personnel will meet with System Operations personnel leading up to a weather-related event to discuss the potential risk of the approaching weather event, if possible (the weather event may be instantaneous, which would not allow ample time for this meeting to take place; i.e. tornado). Actions will be discussed on how to mitigate damage to the system and what part of the system is anticipate to receive damage. In addition, available resources and scheduling may be discussed at this time.

A determination of the initial Impact Classification for the event will be made and notification will be made to the Distribution Services Director, Transmission Services Director and the Director of System Operations of their findings. The Directors will determine whether to activate the GP&L Emergency Operations Command Center ("EOCC"). If activation is determined, the System Operator will send out notification to [redacted] distribution lists that the EOCC has been activated.