

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

Factors taken into consideration for activating the EOCC:

- Current operational situation (number of outages, resources, supplies, etc.)
- Current weather conditions
- Forecasted weather conditions
- Damage assessments
- Restoration priorities
- Forecasted resource requirements
- Other situational specific factors

Impact Classification


Level 1 Small Impact Event (Normal Operations) - System activity is normal with response coordinated with local on-call personnel. Emergency Operation Command Center is not activated.

Level 2 Moderate Impact Event (Heightened Alert/High Activity) – The severity within the service territory is such that restoration activities are generally accomplished with departmental resources within a 12 to 36-hour period. This may require assistance from contractors. Emergency Operation Command Center may or may not be activated depending on severity.

Level 3 Serious Impact Event (Enhanced Support) - The severity within the service territory is such that restoration activities are generally accomplished with departmental resources within a 24 to 48-hour period. This may require assistance from contractors or another mutual aid utility. Emergency Operation Command Center should be activated if the T&D Operations Manager and T & D Coordinator advise activation. The Distribution Services, Transmission Service, and System Operation Directors will make the final decision.

Level 4 Major Impact Event (Comprehensive Support) - The severity within the service territory is such that restoration activities are generally accomplished with assistance from other Regions within a 36 to 72-hour period. This may require mutual assistance from other utilities and/or contractors. Emergency Operation Command Center should be activated.

Level 5 Catastrophic Event (Emergency Support) - The severity within the service territory such that restoration activities are generally accomplished with assistance from contractors and/or mutual aid utilities in excess of a 72-hour period. This requires mutual assistance from other utilities and contractors, as well as other support personnel as dictated by the restoration effort. Emergency Operation Command Center shall be activated.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	32	Confidential

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

After a weather-related event has taken place, Transmission, Distribution and System Operations personnel will meet to conduct a “Lessons Learned” meeting. Any challenges that were identified during the event will be discussed, and measures to overcome these challenges will identified and implemented, if possible.

The Transmission, Distribution and System Operations personnel will generate a report from the Lessons Learned meeting for review and discussion with GP&L management.

2. Hot Weather Emergency

a. Operational Plans

[REDACTED]

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]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	33	Confidential

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

vi. Tools

[REDACTED]
[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]
[REDACTED] distribution lists that the EOCC has been activated.


Factors taken into consideration for activating the EOCC:

- Current operational situation (number of outages, resources, supplies, etc.)
- Current weather conditions
- Forecasted weather conditions
- Damage assessments
- Restoration priorities
- Forecasted resource requirements
- Other situational specific factors

Impact Classification

Level 1 Small Impact Event (Normal Operations) - System activity is normal with response coordinated with local on-call personnel. Emergency Operation Command Center is not activated.

Level 2 Moderate Impact Event (Heightened Alert/High Activity) – The severity within the service territory is such that restoration activities are generally accomplished with departmental resources within a 12 to 36-hour period. This may require assistance from contractors. Emergency Operation Command Center may or may not be activated depending on severity.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	34	Confidential

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


Level 3 Serious Impact Event (Enhanced Support) - The severity within the service territory is such that restoration activities are generally accomplished with departmental resources within a 24 to 48-hour period. This may require assistance from contractors or another mutual aid utility. Emergency Operation Command Center should be activated if the T&D Operations Manager and T & D Coordinator advise activation. The Distribution Services, Transmission Service, and System Operation Directors will make the final decision.

Level 4 Major Impact Event (Comprehensive Support) - The severity within the service territory is such that restoration activities are generally accomplished with assistance from other Regions within a 36 to 72-hour period. This may require mutual assistance from other utilities and/or contractors. Emergency Operation Command Center should be activated.

Level 5 Catastrophic Event (Emergency Support) - The severity within the service territory such that restoration activities are generally accomplished with assistance from contractors and/or mutual aid utilities in excess of a 72-hour period. This requires mutual assistance from other utilities and contractors, as well as other support personnel as dictated by the restoration effort. Emergency Operation Command Center shall be activated.

After a weather-related event has taken place, Transmission, Distribution and System Operations personnel will meet to conduct a “Lessons Learned” meeting. Any challenges that were identified during the event will be discussed, and measures to overcome these challenges will identified and implemented, if possible.

The Transmission, Distribution and System Operations personnel will generate a report from the Lessons Learned meeting for review and discussion with GP&L management.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	35	Confidential

B. Load Shed

1. Procedures for Controlled Shedding of Load

a. Procedure for Controlled Shedding Firm Load

Upon the implementation of the ERCOT EEA by ERCOT and their request to shed firm load, the GP&L shall follow the directions of ERCOT utilizing appropriate policies and procedures. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


ERCOT will instruct electric utilities to immediately implement controlled outages, or load shed, to reduce customer demand for electricity on the ERCOT grid. Load shed will continue until ERCOT determines the outages are no longer required

Depending on the severity of the event, ERCOT may require load shed for several minutes to several hours, or in extreme cases, over a period of days. When required by ERCOT to implement controlled outages, GP&L aims to minimize the disruption to customers. The GP&L procedure is to rotate through non-critical electric circuits, turning power off for a period of time, and then back on. This would continue throughout the load shed event. The length of time the power is out on a circuit depends on the load shed situation. The amount of power to be shed is determined by ERCOT and can vary throughout the event.

b. Rotating Blackouts

When Firm Load shed is expected to exist for longer than 30 minutes, the GP&L Transmission Operators (TOP) shall rotate the feeders that have been outaged with different feeders. After determining that the outage feeders should be rotated:

- i. the new feeders shall be identified that approximate the amount of load to be restored,
- ii. the new feeders shall be outaged and
- iii. after the additional load has been outaged then the original load may be restored if the system conditions allow.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	36	Confidential

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

c. Planned Interruptions See “IRO-017 Outage Coordination Procedure”

Planned interruptions include such events as outaging customers when a piece of utility equipment or cable must be maintained or replaced and the equipment requires the outage of customers to safely perform the replacement or maintenance activity.

Planned Interruptions should be done in such a manner as to minimize the possibility of uncontrolled outages and to allow for the controlled interruption of load, and in blocks and locations such that the load can be restored in a controlled manner.

d. Underfrequency Load Shedding

In accordance with ERCOT and NERC requirements, GP&L shall maintain underfrequency load shedding in three groups at frequencies as determined by ERCOT procedures.

e. High-Set Underfrequency Load Shedding

In accordance with ERCOT requirements, GP&L may allow certain customers that have voluntarily requested to be included as interruptible customers to have high-set underfrequency relays installed that trip customers automatically.

2. Priorities for Restoring Shed Load to Service

Procedures for restoring loads are detailed in the GP&L Black Start Plan provided to and approved by ERCOT.


Load will be restored as directed by ERCOT.

Coordination with ERCOT and Black Start Plan (See GP&L Black Start Plan)

Where this plan and the Black Start Plan conflict, the Black Start Plan shall prevail. In all cases the Transmission Operator shall have the authority and responsibility, in their sole judgment, to modify the implementation of this plan and the Black Start Plan, as required, in order to maintain the stability of the Bulk Electric System.


The following list may be considered by System Operators when considering the restoration priorities of various loads.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	37	Confidential

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

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	38	Confidential

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

3. Registry of Critical Load Customers


GP&L shall maintain a list of Critical Load Customers. This list shall consist of those customers that identify themselves to City's Customer Service as a Critical Load customer and meet the definition. In addition, GP&L may add to the list, at its sole discretion, City facilities or other customers known to GP&L that meet the definition of a Critical Load Customer.

- 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 reviewed and 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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	39	Confidential

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

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

a. Procedure for Adding Customers to Registry of Critical Load Customers

i. Procedure for Adding Hospitals

Commercial Accounts will provide GP&L with an initial list of customers meeting the definition of hospital.

Other customers who believe they meet the definition of hospital may make a request using form “Application for Critical Load Public Safety or Industrial Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a hospital. GP&L may elect to retain known hospitals on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.

ii. Procedure for Adding Police Stations


Commercial Accounts will provide GP&L an initial list of customers meeting the definition of Police Station.

Other customers who believe they meet the definition of Police Station may make a request using form “Application for Critical Load Public Safety or Industrial Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Load Public Safety or Industrial Customer. GP&L may elect to retain known Critical Load Public Safety or Industrial Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.

iii. Procedure for Adding Fire Stations

Commercial Accounts will provide GP&L an initial list of customers meeting the definition of Fire Station.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	40	Confidential

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

Other customers who believe they meet the definition of Fire Station may make a request using form “Application for Critical Load Public Safety or Industrial Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Load Public Safety or Industrial Customer. GP&L may elect to retain known Critical Load Public Safety or Industrial Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.

iv. Procedure for Adding Critical Water and Wastewater Facilities


Commercial Accounts will provide GP&L an initial list of customers meeting the definition of Critical Water and Wastewater Facilities.

Other customers who believe they meet the definition of Critical Water or Wastewater Facility may make a request using form “Application for Critical Load Public Safety or Industrial Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The customer may also request status as a Critical Water or Wastewater Facility under the procedures identified by the Texas Water Commission. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Water or Wastewater Facility. GP&L may elect to retain known Critical Water or Wastewater Facilities on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.

v. Procedure for Adding Customers with Special In-House Life-Sustaining Equipment

Customers who believe they meet the definition of a Customer with Special In-House Life-Sustaining Equipment may make a request using form “Application for Chronic Condition or Critical Care Residential Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	41	Confidential

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

The form states that it is to be renewed annually to maintain status as a Chronic Condition or Critical Care Residential Customer. GP&L will generally remove the customer from the Critical Customer list if they have not renewed their status with 24 months, GP&L may elect to retain known a Chronic Condition or Critical Care Residential Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L's discretion.

vi. Procedure for Adding Critical Natural Gas Facility designated by the Railroad Commission of Texas

Customers who believe they meet the definition of Critical Natural Gas Facility may make a request using form "Application for Critical Load Public Safety or Industrial Customer Status" to be added to the list. This form is found on the City's Utilities webpage or is available through the City's Customer Service. The customer may also request status as a Critical Natural Gas Facility under the procedures identified by the Texas Railroad Commission. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Natural Gas Facility. GP&L may elect to retain known Critical Natural Gas Facilities on the Critical Load Customer list that have not requested renewal of its status at GP&L's discretion.


vii. Procedure for Adding Critical Load Industrial Customers

Customers who believe they meet the definition of a Critical Load Industrial Customer may make a request using form "Application for Critical Load Public Safety or Industrial Customer Status" to be added to the list. This form is found on the City's Utilities webpage or is available through the City's Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Load Public Safety or Industrial Customer. GP&L may elect to retain known Critical Load Public Safety or Industrial Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L's discretion.

viii. Procedure for Adding Critical Load Public Safety Customers (a-d above)

Customers who believe they meet the definition of a Critical Load Public Safety Customer may make a request using form "Application for Critical Load Public

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	42	Confidential

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

Safety or Industrial Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if it meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Critical Load Public Safety or Industrial Customer. GP&L may elect to retain known Critical Load Public Safety or Industrial Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.

ix. Procedure for Adding Critical Care Residential Customers and Chronic Condition Residential Customers

Customers who believe they meet the definition of a Critical Care Residential Customer or Chronic Condition Residential Customer may make a request using form “Application for Chronic Condition or Critical Care Residential Customer Status” to be added to the list. This form is found on the City’s Utilities webpage or is available through the City’s Customer Service. The application will be reviewed and the customer will be added to the list if the customer meets the definition. A customer that does not meet the definition of the Critical Load category requested will be notified of the decision.

The form states that it is to be renewed annually to maintain status as a Chronic Condition or Critical Care Residential Customer. GP&L will generally remove the customer from the Critical Customer list if they have not renewed their status with 24 months, GP&L may elect to retain known a Chronic Condition or Critical Care Residential Customer on the Critical Load Customer list that have not requested renewal of its status at GP&L’s discretion.


x. Procedure for Removing Critical Load Customers from the List

Hospitals will remain on the list until notified by the customer or Commercial Accounts Department to remove them.

Police Stations will remain on the list until notified by the customer or the Commercial Accounts Department to remove them.

Critical Water and Wastewater Facilities designated by the Texas Water Commission will be removed from the list of Critical Loads if GP&L has not received an application or renewal is beyond 24 months.

Customers with Special In-House Life-Sustaining Equipment Critical Care, the “Application for Residential Customers and Chronic Condition Residential

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	43	Confidential

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

Customer Status” says they must reapply each 12 months. The customer will be removed from the list of Critical Load if the latest application or renewal is beyond 24 months.

Critical Natural Gas Facilities designated by the Railroad Commission of Texas will be removed from the list of Critical Loads if GP&L has not received an application or renewal is beyond 24 months.

Critical Load Public Safety customers will remain on the list of Critical Loads until notified by the customer or Commercial Accounts to remove them.

Critical Care Residential Customers and Chronic Condition Residential Customers application says they must reapply each 12 months. Status will be removed from the list if the latest application or renewal is beyond 24 months.

b. Annual Update of List of Critical Load Customers

The official list of Critical Load Customers shall be updated at least annually.

c. Process for Providing Assistance to Critical Load Customers in the Event of an Unplanned Outage

GP&L may receive requests for assistance to Critical Load customers through a variety of methods. These methods include calls or messages received through the GP&L Commercial Accounts group, the City’s Customer Service department, requests passed to GP&L through the City of Garland Emergency Operations Center, first responders or other methods.


Upon receiving the request, GP&L will determine whether GP&L can assist their request. Generally, the customer will be directed to a shelter, hospital, 911 or a non-government agency for assistance.

If GP&L is able to assist with their request, we will communicate back with the customer through telephone, personal contact, text message or email.

d. Communicating with Critical Load Customers During an Emergency

GP&L Commercial Account Administrator or authorized representative 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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	44	Confidential


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

e. Coordinating with Government and Service Agencies During an Emergency

During emergency events, GP&L will coordinate with Government and Service Agencies through the City's EOC. GP&L is a member of the City's EOC.

f. Training Staff with Respect to Serving Critical Load Customers

Training will be provided to GP&L staff during the annual training on the EOP.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	45	Confidential

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

C. Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic (See Appendix B: Human Resource Directive #14 Pandemic Response Directive)

1. Overview

The primary source for information regarding the Pandemic shall be through the City's Health Department, the City's Office of Emergency Management and the City's Emergency Operations Center. These departments are charged with communicating with the State of Texas Emergency Operations Center and the Centers for Disease Control ("CDC") and distributing the information to appropriate personnel within the City.

At the onset and duration of a Pandemic Event, the most probable source for reliable information will be the CDC at the Federal Level and potentially a State of Texas web site set up for more localized information. News media may also be a source but may not always prove to be accurate. It must be kept in mind that the CDC / state health organizations will take large steps (perhaps drastic steps) to contain or control the event due to the potential consequences to the population such as severe illness or even death. Unfortunately, due to the "unknowns" about a Pandemic Event, only time will tell if steps taken will prove to be "appropriate," "too little too late," or "overkill." Therefore, the following should be considered as "guidelines" as personnel may have to adapt to existing real-time conditions and follow these guidelines as appropriate to those conditions.

In the event of a City Pandemic Coordination of Operations (COOP) Activation, GP&L will implement and direct the Pandemic Preparedness Plan per City Policy HR14, Pandemic Response Directive. GP&L shall update the City's Office of Emergency Management. Determination of the appropriate Pandemic Preparedness Plan Action Levels shall be made by the CEO or his designee.

2. Conditions to Activate the Pandemic Plan


a. Determination

The CEO shall make the determination whether to implement the Pandemic Action Plan.

b. Implementation

The actions within the Pandemic section of the EOP shall be coordinated within GP&L divisions and with the City's Office of Emergency Management.

Any conflicts with the Pandemic section of this EOP and the City's Pandemic Plan or Directive shall be coordinated.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	46	Confidential

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


- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

c. Level 3 – Maintain Critical Business Operation Only

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

d. Level 4 – Facility Lockdown

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	48	Confidential

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

As the conditions improve, the CEO, COO and Directors will decide whether activity should change to a different level. [REDACTED]
[REDACTED]

4. Transmission Operations Center Implementation

a. Implementation

The System Operations Director or designee shall coordinate the implementation of the Pandemic Preparedness section of the EOP and shall inform the CEO of all activities. The CEO or designee shall update the City's Office of Emergency Management. Determination of the appropriate Pandemic Preparedness Plan Action Levels shall be made by the CEO.


b. Departmental Responsibilities

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

5. Distribution

a. Implementation

The Distribution Services Director, or designee, shall implement and direct the Pandemic Preparedness Plan for Distribution. The Distribution Services Director or designee shall update GP&L CEO and COO. Determination of the appropriate Pandemic Preparedness Plan Levels shall be made by the Distribution Services Director in coordination with GP&L CEO and COO.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	49	Confidential

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

■ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

■ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6. Energy Services

a. Implementation

The Energy Services Director will implement and direct the pandemic response. The Energy Services Director or designee shall update GP&L CEO and COO. Determination of the appropriate Pandemic Preparedness Plan Action Levels shall be made by the GP&L CEO or his designee.

b. Departmental Responsibilities


■ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

■ [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

7. GP&L Accounting and Budget

a. Essential Contact Information

The procedures below have been developed in the event of a pandemic or other emergency situation that reaches a level where non-essential employees are asked to work remotely. Employees working remotely will [REDACTED]
[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	50	Confidential

b. Administrative

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

c. Wires and Accounts Payable (“AP”) Payments

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


d. Wholesale Customer Billing

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	51	Confidential

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

e. Cash Management

[REDACTED]
[REDACTED]

f. Payroll

[REDACTED]
[REDACTED]

g. Budget

[REDACTED]
[REDACTED]

h. Workforce Management (“WFM”) and Geographic Information System (“GIS”)

[REDACTED]
[REDACTED]

8. Personnel – Remote / Non-Remote


During a Pandemic, GP&L will designate which positions are able to work remotely and which positions are required to work in person. These designations will be reviewed periodically.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]


[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	52	Confidential

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


- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	54	Confidential

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

E. Hurricane Annex

GP&L and TMPA do not have any facilities located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management (“TDEM”).

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	55	Confidential

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

F. Cyber Security Incident

1. Cyber Security Incident Response


[REDACTED]

[REDACTED]

[REDACTED]

2. Declare Incident

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	56	Confidential

3. Determine Investigation Scope

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

4. Collect and Preserve Data


[REDACTED]

5. Perform Technical Analysis

[REDACTED]

a. Correlate Events and Document Timeline

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	57	Confidential


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

[REDACTED]

[REDACTED]

b. Identify Anomalous Activity

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	58	Confidential

c. Identify Root Cause and Enabling Conditions

[REDACTED]

d. Gather Incident Indicators

[REDACTED]


e. Analyze for Common Adversary TTPs

[REDACTED]

f. Validate and Refine Investigation Scope

[REDACTED]

- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	59	Confidential

- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]

6. Third-Party Analysis Support (if needed):


- [REDACTED]
 - [REDACTED]
 - [REDACTED]
[REDACTED]
 - [REDACTED]
 - [REDACTED]

7. Adjust Tools:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8. Containment

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
 - [REDACTED]
[REDACTED]
 - [REDACTED]
[REDACTED]
 - [REDACTED]
[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	60	Confidential

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

- [REDACTED]


- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

[REDACTED]

9. Eradication

[REDACTED]

- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	61	Confidential

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

[REDACTED]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]


[REDACTED]

10.Recover System(s) and Services

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	62	Confidential

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

[REDACTED]

11. Post-Incident Activities

[REDACTED]

12. Adjust Sensors, Alerts, and Log Collection

[REDACTED]

13. Reporting

Reporting cyber security incidents will follow all applicable Federal, State and Local laws, Standards, Protocols and Rules.

a. Cyber Security Incident Response (Reporting)

GP&L has a responsibility to determine if an identified Cyber Security Incident is a Reportable Cyber Security Incident and notify the E-ISAC, unless prohibited by law. Initial notification to E-ISAC, which may be only a preliminary notice, shall not exceed one hour from the determination of a Reportable Cyber Security Incident, or by the end of the next calendar day if the incident was an attempt to compromise.

i. “Cyber Security Incident” is defined by NERC as:


A malicious act or suspicious event that:

- Compromises, or was an attempt to compromise, the Electronic Security Perimeter or Physical Security Perimeter or,
- Disrupts, or was an attempt to disrupt, the operation of a BES Cyber System.

ii. “Reportable Cyber Security Incident” is defined by NERC as:

A Cyber Security Incident that compromised or disrupted:

- A BES Cyber System that performs one or more reliability tasks of a functional entity;
- An Electronic Security Perimeter of a high or medium impact BES Cyber System; or
- An Electronic Access Control or Monitoring System of a high or medium impact BES Cyber System.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	63	Confidential

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

b. Reporting to DOE under OE-417

Many additional categories of attempted or successful cyber or physical attacks are reportable to DOE under form OE-417.

Most attempted or successful cyber or physical attacks on transmission, substation, generation or Control Center equipment are reportable to one or more agencies, TRE, NERC, DOE or others. Each agency has its own definitions as to which events are reportable.

c. Cyber Security Incident Determination and Reportability (Reporting)

- Event occurrences that attempted to gain unauthorized access to system services, resources, or information or attempted to circumvent or disable security controls and;
- Were determined to be from an unknown internal or external source or were determined to be from an inside source with malicious intent to cause disruption or any other harm to defined BES Cyber Systems.


c. Criteria to determine Cyber Security Incident Reportability (Reporting)

Event occurrences that:

- Event occurrences that caused a disruption to one or more reliability tasks of BES Cyber System and,
- Had clear malicious intent and;
- A BES Cyber System, ESP or PSP was the direct target of the attack.

d. Cyber Security Incident Classification (Reporting)

If the response and assessment has led to the GP&L's determination that events or conditions meet the definition of Cyber Security Incident, then additional evaluation must occur to determine if established criteria or thresholds have been met to determine if the Cyber Security Incident qualifies for one of the two reportable conditions found in the table below. Based on the results of these evaluations, Cyber Security Incidents are then classified per the table below.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	64	Confidential

[illegible]

GP&L has a team of personnel that works together to respond to cyber security incidents: Cyber Security Incident Response Team (CSIRT). The CSIRT is responsible for all planning, incident prevention, detection, containment, remediation, recovery, and post-incident analysis stages of a Cyber Security Incident. They are responsible for carrying out procedures, communicating with applicable groups, and possessing general expertise in those stages.

[REDACTED]


- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	65	Confidential

G. Physical Security Incident

1. Notification

Upon notification of a physical security incident or threat, GP&L shall assess the particular situation, [REDACTED] GP&L 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.

[REDACTED]

[REDACTED]

[REDACTED]

2. Assessment


[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	66	Confidential

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

[REDACTED]

3. Response


Once the location and nature of the physical security incident has been determined, GP&L will respond with the appropriate resources based on the situation. However, these resources can vary based on geographical location.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

SECURITY COORDINATOR ON-CALL			
GARLAND POWER & LIGHT			
Name	Role	Office Phone	Cell Phone
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Physical Security Incidents are fluid and may require additional contacts to be made. The Security Coordinator will work with [REDACTED] to identify the next level of contacts.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	67	Confidential

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

With the assistance of GP&L and once first responders have rendered the area safe, law enforcement will take over the scene if there appears to be criminal intent. During the investigation, the impacted scene may require to be physically secured. GP&L has several options;

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

4. Follow up Actions


- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

5. Physical System(s) Recovery

- [REDACTED]
- [REDACTED]

6. Post-Incident Documentation should include:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	68	Confidential

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

7. Reporting

As the incident unfolds there may be federal and/or state laws, regulations or standards reporting requirements that need to be addressed. The designated Incident Commander shall notify one of the following;


COMPLIANCE DESIGNEE ON-CALL			
GARLAND POWER & LIGHT			
Name	Role	Office Phone	Cell Phone

Reporting physical security incidents will follow all applicable Federal, State and Local laws, Standards, Protocols and Rules.

Reporting to DOE under OE-417

Many additional categories of attempted or successful cyber or physical attacks are reportable to DOE under form OE-417.


Most attempted or successful cyber or physical attacks on transmission, substation, generation or Control Center equipment are reportable to one or more agencies, TRE, NERC, DOE or others. Each agency has its own definitions as to which events are reportable.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	69	Confidential

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

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

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	70	Confidential

III.GENERATION ANNEXES

A. Weather Emergency Annex


1. Cold Weather Emergency

a. Operational Plans

[REDACTED]

b. Procedure

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	71	Confidential

c. Verification of the Adequacy and Operability of Fuel Switching Equipment

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**d. Checklist for Generation Facility Personnel
Cold Weather Procedure**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

e. Pre- and Post-Weather Emergency Meetings


[REDACTED]


[REDACTED]

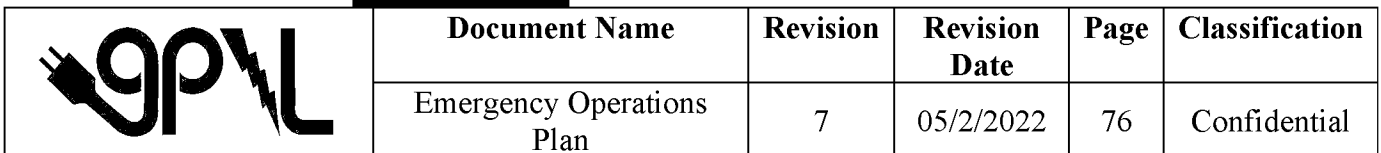
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	74	Confidential

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	75	Confidential

[illegible]

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

- [REDACTED]
- [REDACTED]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

c. Verification of the Adequacy and Operability of Fuel Switching Equipment

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. Checklist for Generation Facility Personnel


- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

e. Pre and Post-Weather Emergency Meetings

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	77	Confidential

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

B. Water Shortage Emergency Annex

Water shortage as pertains to generating electricity:

1. **Low lake level:**


[REDACTED]

2. **Demineralized water storage:**

[REDACTED]

3. **Effluent make-up water:**

[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	78	Confidential

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

C. Restoration of Service Annex

1. Purpose


To identify the appropriate response by Production to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat.

2. Scope

This section applies to all generating units operated by GP&L

3. Process


[REDACTED]

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	79	Confidential

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

D. Pandemic and Endemic Annex


See Section IV.D Pandemic and Endemic Annex within the Transmission and Distribution Annex.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	80	Confidential

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

E. Hurricane Annex




	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	81	Confidential

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

F. Cyber Security Annex


See Section II.F Cyber Security Annex within the Transmission and Distribution Annex.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	82	Confidential

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

G. Physical Security Annex

See Section II.G Physical Security Annex within the Transmission and Distribution Annex.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	83	Confidential

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


IV.DRILLS

Drills shall be conducted at least once each calendar year unless the EOP has been activated to address a real emergency.

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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	84	Confidential

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

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 Executive Summary of the EOP and a redacted copy of the EOP with the Public Utility Commission of Texas on June 1, 2022 and each March 15 beginning in 2023.


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.

Updated filings. An entity must file an updated EOP with the PUCT within 30 days under the following circumstances.

- 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.
- An entity must file an updated EOP in response to feedback provided from PUCT staff.
- 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.
- 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.


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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	85	Confidential

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

- (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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	86	Confidential


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

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, information, operations, the environment, or property, including harm to the 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:

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	87	Confidential


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

- (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 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;

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	88	Confidential


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

- (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:

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	89	Confidential

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

- (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

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	90	Confidential

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


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 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

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	91	Confidential

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

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;

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	92	Confidential

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

- (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.


	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	93	Confidential

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

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


PUBLIC UTILITY COMMISSION OF TEXAS

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

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	94	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

Appendix B – City of Garland Pandemic Response Directive

 GARLAND Directive	Subject	Number
	Human Resources	14
	Issue Date	Revision
	09/25/2009	
Title	Issue Department	
	Human Resources	
	Approved By	
Pandemic Response Directive	William E. Dollar	Page 1 of 5

DIRECTIVE

This Directive provides citywide Human Resources guidelines for management and employees in the event of a pandemic requiring activation of the City of Garland's Pandemic Continuity of Operations Plans (COOP). The intent of this directive is to protect employees' health and safety as well as limit the impact on the delivery of City services.

GENERAL ADMINISTRATION


A pandemic could disrupt the continuity of essential City services due to significant and sustained employee absenteeism and supply chain interruptions.

In order to effectively deliver essential services, the following **assumptions** will be made:

- The City Pandemic COOP will be activated by the City Manager and/or the Office of Emergency Management (OEM), and/or the City Pandemic COOP Coordinator in response to the potential disruption of operational services as the result of a pandemic emergency.
- This Pandemic Human Resources Directive becomes effective upon activation of the City Pandemic COOP and remains effective for the duration of the activation or until amended.
- City operations will be staffed in priority order based on essential City functions and departmental demands.
- To ensure continuity of operations, departments should plan for alternatives and options due to employee absenteeism and possible disruption in delivery of products and services by outside vendors.
- If the pandemic outbreak is widespread regionally or nationally, assistance from outside governmental organizations may be compromised or limited.
- Employee absenteeism may spike above normal levels due to employee and/or family members illness, as well as school and daycare closings.
- Departments will determine any specialized Personal Protective Equipment (PPE) needed to maintain emergency operations.
- Local government entities may be required to provide services not currently performed, such as supporting people in isolation/quarantine as deemed necessary by the Health Department

1. DEFINITIONS

- 1.1 **Pandemic-** disease outbreak occurring over a wide geographic area and affecting an exceptionally high percentage of the population. A pandemic may come and go in waves, each of which can last up to six to eight weeks.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	95	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

- 1.2 **Pandemic Influenza-** occurs when a novel influenza virus emerges for which there is little or no immunity in the human population and begins to cause serious illness, then spreads easily person-to-person worldwide.
- 1.3 **Seasonal (common) Influenza-** refers to the periodic outbreak of respiratory illness that can be transmitted person-to-person in the fall and winter. Most people have some immunity, and a vaccine is typically available.
- 1.4 **Social Distancing** – actions taken to limit person-to-person contact during the pandemic (i.e., placing moratoriums on hand-shaking, substituting teleconferences for face-to-face meetings, staggering breaks, etc.)

2. **COMMUNICATION**

One of the key elements in responding to any emergency situation, including a pandemic, is effective and timely communication.

The City core communication goals are:


- 2.1 Provide clear, consistent, and ongoing communication to employees and the public.
- 2.2 Ensure communication is being delivered by the appropriate authorized City personnel and in accordance with the City's Communicable Disease Crisis Communication Plan, as provided in the Comprehensive Emergency Management Plan (CEMP) and the City Pandemic COOP Plan.
- 2.3 All questions received from the public or outside agencies should be referred to the Managing Director or his designee, who, in turn will provide the City Manager and Public and Media Affairs Manager with a concise written or verbal report of the exchange of information.
- 2.4 Pre-plan departmental communication to include, but not be limited to:
 - 2.4.1 What, when, and how information will be communicated
 - 2.4.2 Roles and responsibilities
 - 2.4.3 Possible effect of the communication on staffing
 - 2.4.4 Provisional changes to assignments/administration

3. **DEPARTMENT PANDEMIC COOP RESPONSE PLANNING**

- 3.1 Due to the possibility that a pandemic may severely impact the Department's ability to perform mission responsibilities, Departments should develop and maintain continuity plans as directed by the Continuity Planning Directive.
- 3.2 Employees should be familiarized with specific departmental procedures that have been put into place related to essential service continuity, service suspensions, closures, and means of communication.

4. **STAFFING**

To ensure continuity of City operations during an extended pandemic, departments, including Human Resources, may simplify processes and administration in order to meet staffing and operational needs/requirements. Departments will be responsible for modifying work assignments and shift schedules to minimize interruption of critical essential services. Managing Directors and Department Heads should develop such scheduling to be prepared for emergency situations.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	96	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

4.1 Overtime

During the pandemic, employees may be required to work overtime hours. Approval of overtime work will continue to be observed.

4.2 Employee Re-Assignment and Work Schedules

During a pandemic, employees may be reassigned or transferred to a different position or shift, as deemed necessary by Management in order to maintain essential services.

The effects of the Pandemic COOP and/or this Directive will confer no new privilege, right of appeal, transfer, promotion, reclassification, compensation, or other right of position or status that is otherwise not part of the established City of Garland directives, policies and procedures.

4.3 Telecommuting

Telecommuting is an acceptable form of alternate work scheduling when deemed practical and is permitted by the City of Garland policies and directives. Managing Directors should identify those critical essential jobs that lend themselves to telecommuting during the Pandemic COOP activation.

Pre-establishing eligibility is recommended for any employee approved for telecommuting so that the time for activating/utilizing this alternative work plan can be minimized. Departments should ensure those employees identified for telecommuting meet all requirements and criteria set forth in the City Directive for Telecommuting (see IT Directive #, Telecommuting Program).

4.4 High Risk Personnel

Personnel considered at high risk for medical complications from infection may request special accommodations in work environment, duties, or locations for the duration of the Pandemic COOP activation period or until immunity is acquired through vaccination or illness. High Risk staff are those employees meeting specific medical conditions, as recognized by the Garland Health Authority. Examples of high risk conditions may include: pregnancy, immunosuppressed individuals, and asthmatics.

4.5 Temporary Agencies


Departments may need to utilize temporary employees if unable to deliver critical essential services. The City of Garland Human Resources Department has existing agreements with a number of temporary agencies from which temporary employees can be requested.

Under no circumstances will the City eliminate background checks and drug testing for any individual working at any position in the organization.

Departments should work proactively with Human Resources to anticipate temporary staffing needs during the COOP activation. Advanced emergency planning should be considered since pools of temporary agency staffs may be depleted due to increased hiring because of the pandemic. Positions requiring specialized training, certifications, and licenses should be identified as these jobs may be difficult to fill.

5. **PUBLIC HEALTH EMERGENCY POLICIES**

In the event of a pandemic COOP activation, it may be necessary to require employees to follow certain medical procedures, practices, and assessments outside the scope of their normal duties. Should this occur, the Garland Health Department will be the lead agency and employees will be expected to comply with all emergency operating procedures and recommendations deemed necessary and issued by the Health Department.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	97	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

6. **INFECTION CONTROL**

Each department should make an assessment of its work environment to determine the occupational exposure levels based on the type of work employees perform and degree of exposure to infection. Employee risk will vary depending on whether their jobs require them to come in close proximity with large numbers of people or with people known to be infected with the pandemic virus. This assessment should be included in the department's pandemic continuity plan.

6.1 **Infection Control Plan**

Departments and employees shall follow all provisions of the Garland Pandemic Infection Control Plan and Department Pandemic COOP control measures to minimize employees' and the public's potential exposure to the disease. Employees are also encouraged to follow safeguards at home.

6.2 **Controlled Access to Buildings**

In the event of a pandemic, it may be necessary to restrict and control access to public buildings to a single point of entry. Security badges/cards to City buildings may be restricted or disabled temporarily to control access in and out of City workplaces to prevent spread of disease.

6.3 **Administrative Leave for Infection Control**

To deter spread of the virus, if an employee is physically able to come to work, but instructed not to report to duty or instructed to leave early by management, he/she will be paid for time missed.

7. **COMPULSORY MEDICAL LEAVE**

In the event that an employee reports to work with symptoms of flu, or develops such symptoms while at work, the employee will be sent home to minimize the spread of infection to other staff and the public. Employees and management will follow the sanitization and return-to-work procedures as outlined in the City's Pandemic Infection Control Plan.

Employees demonstrating flu-like symptoms will be sent home, and shall not return to work until the employee is without fever for at least twenty four (24) hours without the use of fever-reducing medication. Ill employees may be sent home whether or not they have sufficient paid leave time accrued to cover the absence.


8. **STAFF REFUSAL TO WORK**

During a pandemic outbreak, some employees may become concerned about reporting to work, for fear of exposure to themselves or their families. Reasonable efforts and/or accommodations to educate employees and to minimize concerns of exposure risks on the job are encouraged.

However, with the expected high levels of sickness absence during a Pandemic, it is expected that all employees who are well, and do not have dependent care conflicts, report for work. Instances of employees refusing to report to work with no reasonable grounds will be treated as unpaid unauthorized absence and will be subject to disciplinary actions as set forth in existing Human Resources directives.

9. **LEAVE USAGE/APPROVED LEAVE CANCELLATION**

Employees are able to use sick leave, vacation, discretionary time, compensatory time, and other available paid leave such as Personal Holiday, Bonus Holiday, etc. if absent due to personal or family illness during the Pandemic COOP activation. For employees who are absent due to extended personal or family illness during a Pandemic activation, FMLA may apply.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	98	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

Employees are able to use vacation, discretionary time, compensatory time, and other paid leave such as Personal Holiday, Bonus Holiday, etc. to provide dependent care during the Pandemic COOP activation.

Modifications to the leave use policy may be developed and outlined by Human Resources as deemed necessary to insure continuity of operations during the Pandemic COOP activation period.

The City reserves the right to temporarily suspend or cancel leave of well personnel should their services be required to maintain delivery of critical essential job functions.


Scheduling issues surrounding leave usage and cancellation will be resolved by Managing Directors and Department Heads. During the Pandemic COOP activation, management decisions regarding leave usage will be considered final and not subject to appeal.

10. **BENEFITS**

As long as an employee remains in "pay status", continuation of benefits should not be affected. Employees should plan for alternate sources of medical care in the event of closure or reduced accessibility to:

- CityCARE Clinic
- Primary Care Physicians
- Urgent Care Facilities (i.e. Care Now, Prima Care)
- Hospital Emergency Rooms
- Local Pharmacies

The City's Employee Assistance Program (EAP) will be a resource to aid and assist employees and family members during the pandemic crisis.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	99	Confidential

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

Appendix C - 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:

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	100	Confidential

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


(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.

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	101	Confidential

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

Appendix D – Application for Chronic Condition or Critical Care Residential Customer Status



GARLAND

Application for Chronic Condition or Critical Care Residential Customer Status

☐ Applying for the first time

☐ Renewing existing status

PLEASE PRINT RESPONSES

Section 1: To be completed by the Patient

Patient's name: _____ Birthdate: ____ Relationship to Customer of Record

(Account holder)

☐ Self

☐ Other: _____

Home/Cell: (_____) _____

Work: (_____) _____

I hereby authorize my health care provider(s) to release the medical information included on this Application to my utility, or third parties authorized by the utility, to assist with the review, approval, and processing of this request. I understand that continuous utility service is not guaranteed and it is my responsibility to maintain a backup system or have an alternative plan in the event of a loss of utility service. I certify that the patient lives at the address listed below and that all information provided is accurate. If I meet the conditions for a Chronic Condition or Critical Care status, I also agree to notify the City of Garland in writing when this medical status is no longer necessary.

Signature: _____

Patient/Legal Guardian/Power of Attorney

Date: _____

Section 2: To be completed by the Customer of Record (Account Holder)

Customer Name on the utility account: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Home/Cell: (_____) _____

Work: (_____) _____

Home Email: _____ Account Number: _____

Utility services provided by City of Garland: ☐ Electric ☐ Water

Please read and initial the following:

_____ Customer understands that he/she secures no special right to preferential service and that the City of Garland in no way guarantees uninterrupted utility service(s).

_____ Customer understands that it is important that he/she make alternative arrangements in the event of an interruption in the normal supply of utility services.

I certify the information above is accurate AND the patient is the customer of record or a household member of the customer of record residing at this address.


Customer Signature: _____

Date: _____

Customer should call 911 in the event of an emergency.

CSC5FORM0919

Page 1 of 2

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	102	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

Section 3: THE FOLLOWING INFORMATION IS TO BE COMPLETED BY THE PHYSICIAN OR PUBLIC HEALTH OFFICIAL ONLY.

Please Check the appropriate boxes to indicate the patient's status (Chronic Condition or Critical Care) and specify the needed utility service(s).

Chronic Condition Patient

Patient suffers from an existing medical condition that will be aggravated by the lack of utility service.

I certify that the patient has the following Chronic Condition condition(s) that will be aggravated by the loss of utility service.

Specify the needed utility service(s): Electric Water

Condition(s): _____

Equipment: _____

Time Period: _____

Critical Care Patient

Patient uses life-supporting medical equipment at home and lack of the utility service would be immediately life threatening.

I certify that the following life-support system(s) or medical equipment is/are used by the Critical Care patient.

Specify the needed utility service(s): Electric Water

Equipment: _____

Life support equipment requirements: _____

Other information or comments: _____

Check one: Physician Public Health Official License #: _____

Physician/Health Official name (PLEASE PRINT): _____


Name and Job title (if not a physician): _____

Business address: _____

Business phone: () Fax: ()

I certify that the patient identified on this form has been examined by me, to the best of my knowledge the information provided is true, and the patient meets the criteria of a Chronic Condition Patient or a Critical Care Patient.

Signature: _____ Date: _____
(Physician or Public Health Official)

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	103	Confidential

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

Appendix E – Application for Critical Load Public Safety or Industrial Customer Status



GARLAND

Application for Critical Load Public Safety or Industrial Customer Status


This application must be completed in order to request the designation of **non-residential** Critical Load Public Safety or Critical Load Industrial customer status.

The criteria for qualification as Critical Load Public Safety or Critical Load Industrial are provided in the Public Utility Commission of Texas Substantive Rule 25.497. Designation of critical load does not guarantee an uninterrupted supply of electricity. It is the responsibility of the customer to make arrangements for alternative sources of electric power should a localized outage or load shed event occur.

- ☐ New Application*
- ☐ Annual Renewal*

*Must select one of the above

Section 1: Submitter's Contact Information
First Name: _____ Last Name: _____
Email Address: _____
Phone: (____) _____
Section 2: Customer Contact Details
Name (if different from above): _____
Contact Title: _____
Mailing Address: _____
City: _____ State: _____ Zip Code: _____
Phone: (____) _____ Secondary Phone: (____) _____
Email Address: _____
Section 3: Service Address Information
Customer Name (As listed on utility account): _____
Street Address (1): _____ Account #: _____
Street Address (2): _____ Account #: _____
Street Address (3): _____ Account #: _____
Street Address (4): _____ Account #: _____
Street Address (5): _____ Account #: _____
<i>If you have additional service addresses, attach them on a separate page.</i>

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	104	Confidential

This Emergency Operations Plan is considered **CONFIDENTIAL** and is **FOR OFFICIAL USE ONLY** by City of Garland employees only. Any distribution to other than City of Garland personnel requires the approval of the GP&L General Manager/CEO or the GP&L Electric Regulatory Compliance Officer.

Section 4: Facility Type and Description

Please select the type of facility and/or describe the specific public safety issue that may result from an interruption of normal power service (reference [Public Utility Commission of Texas Substantive Rule 25.497](#)):

Start by selecting the applicable services group for this application from the following (select only one)

- ☐ Healthcare Services
- ☐ Public Services (Airport, Municipal, etc.)
- ☐ Critical Load Serving Electric Generation and Cogeneration (Gas/Pipeline Infrastructure)
- ☐ Critical Load Industrial

Description: _____

Describe any existing battery or backup capacity, or dual feed capability (required)

- ☐ None
- ☐ Battery Backup Battery Backup Capacity(kW) _____
- ☐ Battery Generation Backup Generation Capacity(kW) _____
- ☐ Utility dual feed capability Owner of transfer switch _____

Length of time the facility can operate without electricity from Garland Power & Light: _____

Length of time required for start-up following a power outage: _____

PLEASE NOTE: It is the responsibility of the customer to make arrangements for alternative sources of electric power should a localized outage or significant load shed event occur.

DESIGNATION OF A CRITICAL LOAD DOES NOT GUARANTEE AN UNINTERRUPTED SUPPLY OF ELECTRICITY.

If mailing, return completed form to:

Utility Customer Service
City of Garland
217 N. Fifth St.
Garland, TX 75040

To send form electronically:

Add attachments, if needed *(If using anything other than adobe Pro to complete this form you will need to attach the documentation after you select the submit button)*

Attach Documentation

Submit

Submit a completed form:


You will be contacted r

To be completed by City of Garland staff only.

Is account eligible for Critical Load Status? Yes ☐ No ☐ If no, why? _____

Reviewed for eligibility by: _____ Date: _____

Entered by: _____ Date: _____ Account Noted: _____

	Document Name	Revision	Revision Date	Page	Classification
	Emergency Operations Plan	7	05/2/2022	105	Confidential

VIII. DME EOP (Redacted)

Electric Service Emergency Operations Plans

April 1

2022

Emergency plan compilation as required by Substantive Rule §25.53 of the Public Utility Commission of Texas.



Executive Summary

Emergency Operation Plan

The Emergency Operations Plan (EOP) defines policies and procedures that Denton Municipal Electric (DME) should follow in the event of an energy emergency. The plan has been prepared to incorporate appropriate ERCOT and NERC requirements as well as changes in the DME/ERCOT system.

The EOP implements a set of plans to mitigate operating emergencies and implements disaster recovery. These plans consist of roles and responsibilities, processes to prepare for and mitigate emergencies, notification procedures to regulators and customers, resource coordination, and documents the expectations required for the reliable and continued operations of the local and bulk electric system. The plan is a compilation of multiple plans that address specific subjects. The first section is focused on general operations and transmission operations. The second section is focused on the Denton Energy Center generation operations.

The EOP addresses reliability impacts of extreme weather conditions and weather-related hazards, natural disasters, energy capacity shortages, total or partial system blackouts, and security risk to the electric grid. The EOP outlines training, planning, preparedness, coordination, response, and after-action reports to address electric system disturbances.

DME ensures all DME groups have a clear understanding of their responsibilities during emergency situations by reviewing and training on specific tasks bi-annually. Titles and names of the persons having access to and training on the EOP and dates of the access to or training on the EOP are provided in the attached file.

DME, as a department of the City of Denton, recognizes the DME General Manager as the highest-ranking representative, official, and officer with binding authority over DME through the authority granted to the City Manager under Ordinance 22-384. The DME General Manager affirms relevant operating personnel are familiar with and have received training on the applicable contents and execution of the DME EOP and related plans, as well as instruction to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of the specific circumstances during the course of an emergency. The EOP has been approved by DME Executive Team, drills have been completed, and the EOP has been distributed to local jurisdictions, as needed. DME maintains a Disaster Recovery Plan that addresses returning to normal after disruptions and emergency management personnel have received the latest IS-100, IS-200, IS-700 and IS-800 National Incident Management System training.

Section I - 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

Executive Summary	Bates p. 2
Contents and Policies contained in in the EOP.....	Bates pp. 3-4
Reference to specific sections and page numbers of the rule.....	Bates pp. 3-4
Record of Distribution/training.....	Bates p. 5
Affidavit from the highest-ranking official.....	Bates p. 6
Change Log.....	Bates p. 7
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

- Section II-- DME Generation Specific Plans for Denton Energy Center
 - (DEC):
 -

This section removed as not applicable to TMPA.

DEC EOP Table of Contents.....	Bates p. 171
Cold Weather Emergency (DME-DEC Extreme Cold Procedures).....	Bates pp. 172-190
Hot Weather Emergency (DME-DEC Extreme Heat Procedures).....	Bates pp. 191-203
Water Shortage (DME-DEC Water Shortage).....	Bates pp. 204-211
Restoration of Services (DME-DEC Plant Trip Recovery).....	Bates pp. 212-223
Pandemic & Epidemic (DME-DEC Pandemic Preparedness Proc.).....	Bates pp. 224-253
Hurricane (DME-DEC Severe Weather & Natural Disasters).....	Bates pp. 254-268
Cyber Security (DME-DEC Cyber Disruption).....	Bates pp. 269-281
Physical Security (DME-DEC Site Security).....	Bates pp. 282-293

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	

AFFIDAVIT OF ANTOINO PUENTE, JR.

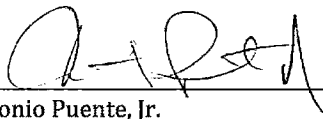
STATE OF TEXAS }
 }
COUNTY OF DENTON }

Before me, the undersigned notary public, personally came and appeared:

Antonio Puente, Jr.
1659 Spencer Rd.
Denton, TX 76205

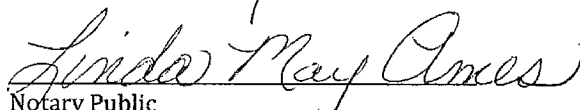
Who, after being duly sworn by me, said:

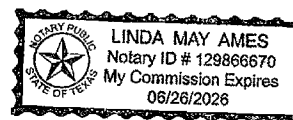
1. I am over the age of eighteen, suffer no legal disabilities, have personal knowledge of the facts set forth below, and am competent to testify.
2. I am the General Manager of Denton Municipal Electric (DME), a Texas municipally owned utility, and have personal knowledge of the operational facts and circumstances contained within DME's Emergency Operations Plan (EOP);
3. I attest that I am an officer with binding authority to execute this affidavit and authorize the filing of DME's EOP;
4. I attest that relevant operating personnel are familiar with and/or 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 that emergency circumstances dictate appropriate deviations;
5. I attest that the EOP has been reviewed and approved by the appropriate executives;
6. I attest that training/drills have been conducted as required by Public Utility Substantive Rule § 25.53, except that the PUCT's 30 day notice process in § 25.53(f) did not exist prior the drill and could not be utilized.
7. I attest that DME's EOP has been distributed to local jurisdictions as needed;
8. I attest that DME maintains a business continuity plan that addresses returning to normal operations after disruptions caused by a qualifying event;
9. I attest that DME's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events as part of the City's Emergency Operations Center have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.
10. The facts stated herein are based on information and belief and are true and correct to the best of my knowledge.


Antonio Puente, Jr.

Sworn and subscribed before me this

the 23 day of May, 2022


Notary Public
My Commission expires: 6-26-2026



Change Log

<u>Revision</u>	<u>Date</u>	<u>Prepared by</u>	<u>Reviewed by</u>	<u>Approved by</u>	<u>Change summary</u>
0	April 1, 2022 (effective)	J. Looper/J. Brown	Smith Day	Antonio Puente, Jr.	Initial



2022 Emergency Operations Plan (EOP)

**This version supersedes previous versions
of the EOP: Effective 4/1/2022**

Divisions of Electric

***Operations, Substations, System Operations,
Metering, Distribution, Engineering,
& Administration***

Table of Contents

- I. Purpose**
- II. Scope**
- III. Definitions**
- IV. Key Personnel Roles and Responsibilities**
- V. Processes to Prepare for and Mitigate Emergencies**
- VI. Communications**
- VII. Other Related Plans**
- VIII. Administrative**

In cases of emergency, Denton Municipal Electric (DME) has the responsibility and clear decision-making authority to take whatever actions are needed related to transmission and generation facilities that it operates. DME does not have authority over other Transmission Owner's facilities or the overall reliability of the ERCOT Interconnection

I. Purpose

DME's Emergency Operations Plan implements a set of plans to mitigate operating emergencies and implement disaster recovery. These plans consist of the roles and responsibilities for activating the Operating Plans and the processes to prepare for and mitigate any operating emergencies. This includes notification to ERCOT when experiencing an operating emergency, cancellation of transmission or generation outages, transmission system reconfiguration, redispatch of generation request, provisions for operator-controlled manual load shedding, and reliability impacts of extreme weather conditions. This Plan documents the expectations required for the reliable and continued operations of the (BES) Bulk Electric System by DME System Operations personnel.

II. Scope

In the event of a major system disturbance of the electrical system within ERCOT or locally within DME's system, it is necessary to have procedures in place to cope with events and to restore the system to a normal state as quickly as possible. This plan is designed to define, or where appropriate, reference those procedures located in other documents. This plan applies to all DME TDSP business functions performed by DME under applicable NERC registrations, Joint Registration Agreements, Coordinated Functional Registration Agreements, or Delegation Agreements.

This EOP and all associated plans, procedures, and processes, must be reviewed annually and provided to applicable personnel as part of the required training at DME. A record of the distribution and training that includes names and dates of the training will be retained in an attachment of the EOP and stored in the same folder as the EOP as well as provided to the training department for record retention. Major changes to the EOP or associated plans that require significant changes that warrant a resubmission to ERCOT and PUCT must be resubmitted within 30 days of the approved plans changes. A copy shall be available at the Primary and Backup Control Rooms of the most recent version of this plan for the DME System Operators.

This EOP applies to all DME personnel listed in the Role and Responsibilities section of this EOP. This EOP applies to all DME operated equipment either owned by DME or owned by TMPA within Denton County.

III. Definitions

Emergency – Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System

Operating Plan – A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.

Primary Communication – Primary method of Interpersonal Communication capability with its Reliability Coordinator, neighboring Transmission Operator, or Generator Operator within its Transmission Operator Area.

Alternate Communication – Secondary method of Interpersonal Communication capability with its Reliability Coordinator, neighboring Transmission Operator, or Generator Operator within its Transmission Operator Area.

IV. Key Personnel Roles and Responsibilities

In accordance with the NERC Standards and with ERCOT Protocols and Operating Guides, Denton Municipal Electric dictates and delegates the responsibility and authority to implement real-time actions to ensure the stable operation of the Bulk Electric System to the DME System Operator or designated NERC-certified Transmission Operator. Such actions include shedding of firm load to prevent or alleviate System Operating Limits or Interconnection Reliability Operating Limit violations. These actions shall be executed fully and promptly when determined necessary by the System Operator and/or when received by valid dispatch instructions or directives from ERCOT, unless such actions would create a threat to safety, risk of bodily harm, or damage to equipment, or are otherwise not in compliance with ERCOT Protocols or NERC standards. These actions shall be performed without obtaining approval from higher level personnel within DME.

All Functions/Positions:

Redacted

Redacted

C. DME NIMMS certification requirements

- a. Responsible for Coordinating with COD Emergency Operations Center will be NIMMS certified in 100, 200, 700 and 800
- b. DME Management Staff that have assigned roles responsible for overseeing emergency response within the EOP, Disaster Recovery Plan will be NIMMS certified in 100, 200, 700 and 800.
- c. General worker or Administration staff (field crew members, engineering staff, financial staff, logistics support staff, and administrative assistants) that contribute to the recovery efforts after major system damage will be NIMMS certified in 100 and 700.

Redacted

is "on call", or the person design

Redacted

Redacted

Redacted

Redacted

Redacted

system via phone call and "ERCOT Outage Scheduler"

Redacted

Redacted

- c. Wildfire
 - i. DME uses industry standard construction practices to minimize faults on the transmission and distribution system thereby reducing risk of sparks or melted metal created by faults, from falling to the ground causing wildfires. DME is located in an urban area, minimizing the risk of wildfires affecting the operation or reliability of the electric system
 - d. Hurricane
 - i. DME is in such a geographical area that hurricanes do not have a major impact on the electric system. However, DME does prepare for thunderstorms created by hurricanes when applicable and as described in the Disaster Recovery Plan. TDEM has identified UNT Super Pit as a hurricane evacuation gathering facility along an evacuation corridor. DME has identified the UNT Super Pit as a critical load.
 - e. Pandemic
 - i. See DME Pandemic Response Plan
- B. DME will conduct a tabletop discussion bi-annually (winter and summer preparedness) with personnel from Operations, Construction, System Operations, Transmission and Distribution Engineering, Management, Metering, Business Services, and Substations to determine if any extreme weather conditions might affect reliability. DME will address any concerns that the group identified in the exercise before the extreme weather event has any adverse effects on the electric system. Communication of any weather-related issues by ERCOT may come in the form of (OCN's) Operating Conditions Notices, Advisories, Watches, and Emergency Notices. These notices are often given by phone or the ERCOT website.

Redacted

Redacted

- 4) Specific emergency plans may have Roles and Responsibilities sections to deal with particular incidents and should be used in those respective situations

VI. Communications

Redacted

Redacted

VII. Other Related Plans

Redacted

Redacted

Redacted

Redacted



Operations Plans

VIII. Administrative

Annual Reviews and Updates

DME annually reviews and updates emergency plans and provides a copy to ERCOT ISO as applicable.

Document Control

Created by:

Galen Gillum	Feb 2012
--------------	----------

Change History:

The change history below reflects changes to the document or its structure

Version	Description of Change	Date
V 01.00	Initial version – this document contains elements from previous versions of SOP-System Operating Procedure and the CP-Contingency Plan	Feb. 2012
V 01.01	Minor changes, typo corrections, dates	Jan 2013
V 01.02	Updated per new PER-001.02 standard	Jan-2015
V 01.03	Added DEC	Aug 2018
V 02.00	Minor Corrections and Changes; added generation, Reviewed for 2020	Jan 2020
V 03.00	Update to include PUCT regulation	April 2022

Review Log:

This document shall be reviewed each calendar year.

Reviewed By:	Title	Date
Jerry Looper	Sys Ops Superintendent	Jan 2013
Larry Helms	Sys Ops Supervisor	Jan 2014
Jerry Looper	Sys Ops Superintendent	Jan 2015
Paul Millsap	Sys Ops Supervisor	Jan 2016
Jerry Looper	Sys Ops Manager	Jan 2017
Jerry Looper	Sys Ops Manager	Jan 2018
Jerry Looper	Sys Ops Manager	Jan 2019
Cameron Zahn	Outage Coordinator	Jan 2020

Cameron Zahn	Outage Coordinator	Jan 2021
Cameron Zahn	Outage Coordinator	Jan 2022

Approved by:	Title:	Date:
Chris Lutrick	Executive Manager of Operations	
	DocuSigned by: <i>Chris Lutrick</i> AF8FF9AE1F5849F	5/17/2022
Jerry Looper	System Operations Division Manager	
	DocuSigned by: <i>Jerry Looper</i> 8DA3CF408A2B4D9...	5/17/2022
Tony Puente	General Manager of Denton Municipal Electric	
	DocuSigned by: <i>Antonio Puente, Jr.</i> E3760944C2BF4B5...	5/18/2022



Disaster Recovery Plan TDSP

***Divisions of Electric
Operations, Substations, System Operations, Metering,
Construction, Engineering, Communications &
Administration***

UPDATE

April 18th , 2022

DME 2022 Disaster Recovery Plan

Table of Contents

I.	Purpose
II.	Review and Approval
III.	Types of Events
IV.	Roles and Responsibilities
V.	Seasonal Preparedness Drills
VI.	Pre-Emergency Operations
VII.	Disaster Initiation and Return to Business Continuity
VIII.	Primary and Backup Control Room Status TDSP and EMO
IX.	Event Level
X.	System Status
XI.	Transmission and Substations Evaluation
XII.	Distribution System Evaluation
XIII.	Other Emergency Plans
XIV.	Specific Contingencies
XV.	Staging areas
XVI.	Emergency Generators
XVII.	800 MHZ Radio System
XVIII.	Ensure Safety of DME Personnel and Customer Safety
XIX.	Communication of Information and Coordination
XX.	Ensure Proper Procedures are Followed and Maintained
XXI.	Evaluate system condition and create action plan
XXII.	Resources and vendor list
XXIII.	Exhibit 1 Substation and Transmission Evaluation Sheet
XXIV.	Exhibit 2 Distribution Evaluation Sheet
XXV.	Exhibit 3 Distribution Materials List
XXVI.	Attachment 1 Mutual Aid Agreement
XXVII.	Pre-Identified Materials and Chemicals list

DME 2022 Disaster Recovery Plan

I. Purpose

This plan is a guideline only and offers help with resources to deal with a major disaster within the DME service territory. This plan does not supersede any emergency operation plan including the DME Black Start Plan, Load Shed Plan, Backup Control Room Plan, ERCOT Black Start Plan or the DME Emergency Operations Plan. This plan shall not lose sight of the safety of DME customers and employees.

II. Review and Approval

The System Operations Division Manager is responsible for the development, review, after action report, and updates of the Disaster Recovery Plan. The Disaster Recovery Team listed below is responsible for approval of the plan and recommendation of affidavit of affirmation to the City Manager. The Plan will be reviewed and/or updated annually or when major changes to the plan are needed. The revised plan must be submitted to ERCOT and PUCT within 30 days. The plan will be submitted to PUCT annually on by February 15th.

III. Types of Events

1. **Thunderstorm related event**- an event where thunderstorms impact the Denton area and cause considerable damage to transmission or distribution overhead lines including pole or tower damage.
2. **Natural Disaster** - a major adverse event resulting from natural processes of the Earth; examples include floods, tornado, 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.
 - a. **Ice Storm/Severe Cold Weather related event** - a type of winter storm that is characterized by freezing rain, which results in the accumulation of at least 0.25-inch of ice on exposed surfaces or projected temperatures for an extended period of time at or below freezing.
 - b. **Extreme Heat**- a period of excessive hot weather that be accompanied by high humidity or drought
 - c. **Flooding event** – An event where an overflow of water submerges dry land which is normally dry and caused roadways and bridges to be impassable.
 - d. **Wildfire**- a large destructive fire that spreads quickly over woodland or brush,
 - e. **Hurricane** – a tropical storm that winds have reached a constant speed of 74 miles per hour or more
3. **Pandemic/Epidemic**- infectious disease that is suddenly increasing in cases and/or has spread across a large region or continent.
4. **Cyber Security** – Protecting networks, devices, and data from unauthorized access or criminal use