



## Filing Receipt

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

EXECUTIVE SUMMARY

OF

EMERGENCY OPERATIONS PLAN

CITY OF GARLAND / GARLAND POWER & LIGHT

MAY 31, 2022



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## **I. Contents and Policies Contained in the EOP**

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

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

### **PURPOSE**

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

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

The objectives of this EOP are to:

1. Protect the continuity of electric service within the service area by providing an emergency plan to be implemented when there is a forecast or occurrence of events that affect system security.
2. Support the timely and orderly restoration of electric service following disruptions.
3. Protect the safety of GP&L employees and the public during and after emergency operations.
4. Support compliance by GP&L operations during emergency conditions with all local, state, and federal regulations and policies as well as all contractual agreements.
5. Maintain communications with GP&L customers to determine service conditions, communicate expected actions and service expectations, and request actions from customers.
6. Inform and coordinate actions and resources between government agencies and regulatory agencies such as the City of Garland Emergency Operation Center, the Public Utility Commission of Texas ("PUCT"), North American Electric Reliability

Corporation (“NERC”), Federal Energy Regulatory Commission (“FERC”), City Public Safety agencies and the Federal Bureau of Investigation (“FBI”).

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

### **EOP Applicability**

**All employees are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.**

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

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

GP&L operates distribution, transmission and generation facilities within the ERCOT grid.

This policy, shall apply to all Texas Municipal Power Agency (TMPA) transmission assets managed by City of Garland. This does not include TMPA transmission assets in the Denton Area operated by Denton Municipal Utilities.

The EOP applies to the following operational situations:

- a. **Major Storm** – a period of high incidence of outages from the failure of electric transmission and distribution facilities due to trees or other object coming into contact with electric facilities during periods of high winds or icy conditions
- b. **Energy Emergency Alert (EEA)** - An orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an operating condition in which the safety or reliability of the ERCOT electric grid is compromised or threatened, as determined by ERCOT while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System
- c. **Extreme Cold Weather** – a period of extreme cold weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities
- d. **Extreme Hot Weather** - a period of extreme hot weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities

- e. **Black Start** – restoration of electric service when all or a major portion of the ERCOT electric grid has lost service
- f. **Load Shed** – the intentional removal and restoration of firm load customers at the direction of ERCOT, generally in response to a system emergency.
- g. **Pandemic** – a period when resources, including personnel, may be limited due to widespread disease or other conditions where the limited physical contact between employees and between employees and the public should be maintained
- h. **Sabotage / Terrorism** – response to an act or anticipated act of sabotage or terrorism directed at TMLPA Transmission facilities or GP&L facilities
- i. **Heightened Security** – a period of increased security due to elevated threat level
- j. **Extreme Temperature Events** – Weather events that are beyond the normal anticipated climate for the GP&L or TMLPA service territory
- k. **Wildfire Events** – a grass or forest fire that has the ability to reduce the quality of electric service to consumers by damaging, degrading or contaminating electric utility facilities
- l. **Cyber Security Events** – an intentional cyber-attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers
- m. **Physical Security Events** – an intentional physical attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers
- n. **Water Shortage Emergency for Generation** – a period when there is a shortage of water to provide cooling for generating units
- o. **Restoration of Service of Generation** – the tripping or failure to start of a generating unit during a period when there is or is expected to be a shortage of generation within the ERCOT electric grid

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

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

The EOP also contains the following sections:

Communications with:

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

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

- Transmission and Distribution Annexes including:

- Weather Emergencies including Cold Weather Emergencies and Hot Weather Emergencies

- Load Shed including:

- Procedures for the Controlled Shedding of Load

- Priorities for Restoring Shed Load to Service

- Registry of Critical Load Customers

- Procedure for Maintaining an Accurate Registry of Critical Load Customers

- Pandemic and Epidemic Plan for Continuous and Adequate Service During a Pandemic

- Wildfire Annex

- Hurricane Annex

- Cyber Security Incident

- Physical Security Incident

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

- Generation Annexes Including:

- Weather Emergencies including Cold Weather Emergencies and Hot Weather Emergencies

- Water Shortage Emergency Annex

- Restoration of Service Annex

- Pandemic and Endemic Annex

- Hurricane Annex

- Cyber Security Annex

- Physical Security Annex

- Drills

- Reporting Requirements

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

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

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

Introduction, 25.53(d)(1)(A), page 10

EOP Applicability, 25.53(d)(1)(A), page 11

Individuals Responsible for Maintaining and Implementing the EOP,  
25.53(d)(1)(B), page 13

Revision Control Summary, 25.53(d)(1)(C), page 9 and page 14

Supersedes Previous Versions, 25.53(d)(1)(D), page 1 and page 14

Date of Approval, 25.53(d)(1)(E), page 1 and page 14

Definitions,

Filing Requirements,

How to Use This EOP and

Essential Functions of GP&L

### **B. 16 TAC § 25.53(d)(2) Communications Plan**

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

Handling Complaints, 25.53(d)(2)(A), page 21

Communicating with the Public, 25.53(d)(2)(A), page 22

Communicating with the Media, 25.53(d)(2)(A) and 25.53(d)(2)(B), page 22

Communicating with the Customers, 25.53(d)(2)(A), page 22

Communicating with the Public Utility Commission of Texas, 25.53(d)(2)(A) and  
25.53(d)(2)(B), page 23

Communicating with the Office of Public Utility Counsel, 25.53(d)(2)(A) and  
25.53(d)(2)(B), page 23

Communicating with Local and State Governmental Entities, Officials and  
Emergency Operations Centers. 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23

Communicating with ERCOT 25.53(d)(2)(A) and 25.53(d)(2)(B), page 23

Communicating with Critical Load Customers 25.53(d)(2)(A), page 24 and

Communicating with Critical Fuel Suppliers 25.53(d)(2)(B), page 24

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

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

Lists of Supplies

GP&L Transmission and Distribution

GP&L System Operations and

GP&L Communications

- D. 16 TAC § 25.53(d)(4) Staffing During Emergency Response**  
Section I.D. Staffing During Emergency Response is on page 25.
- E. 16 TAC § 25.53(d)(5) Weather Related Hazards**  
Section I.E. Weather Related Hazards begins on page 26 and goes through page 28.  
It includes subsections on:  
Tornadoes, page 26  
Hurricanes, page 26  
Extreme Cold Weather, page 26  
Extreme Hot Weather, page 26  
Drought, page 27 and  
Flooding, page 27
- F. 16 TAC § 25.53(d)(5) Process for Activation of EOP**  
Section I.F. EOP Implementation is on page 28.
- G. 16 TAC § 25.53(e)(1) Transmission and Distribution Annexes**  
Section II. Transmission and Distribution Annexes begins on page 29 and continues through page 70. It includes Section H through O below.
- H. 16 TAC § 25.53(e)(1)(A) Weather Emergency Annex**  
Section II.A. Weather Emergency Annex begins on page 29 and goes through page 35. It includes subsections on:  
Cold Weather Emergency, 25.53(e)(1)(A)(i), page 29  
Cold Weather Emergency Checklist, 25.53(e)(1)(A)(ii), page 31  
Hot Weather Emergency, 25.53(e)(1)(A)(i), page 33  
Hot Weather Emergency Checklist, 25.53(e)(1)(A)(ii), page 33
- I. 16 TAC § 25.53(e)(1)(B) Load Shed Annex**  
Section II.B. Load Shed Annex begins on page 36 and goes through page 45. It includes subsections on:  
Procedures for Controlled Shedding of Load, 25.53(e)(1)(B)(i), page 36  
Priorities for Restoring Shed Load to Service, 25.53(e)(1)(B)(ii), page 37  
Registry of Critical Load Customers,  
Procedure for Maintaining an Accurate Registry of Critical Load Customers,  
25.53(e)(1)(A)(iii),
- J. 16 TAC § 25.53(e)(1)(C) Pandemic and Epidemic Annex**  
Section II.C. Pandemic and Epidemic Annex begins on page 46 and goes through page 52. It includes subsections on:  
Overview  
Conditions to Activate the Pandemic Plan  
Pandemic Preparedness Action Levels  
Transmission Operations Center Implementation

Distribution  
Energy Services  
GP&L Accounting and Budget  
Personnel – Remote / Non-Remote

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

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

Response to Wildfire Emergencies  
Mitigations of Hazards of Wildfire

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

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

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

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

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

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

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

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



- O. 16 TAC § 25.53(e)(1)(H) A transmission and distribution utility that leases or operates facilities under PURA §39.918(b)(1) or procures, owns, and operates facilities under PURA §39.918(b)(2)**

Section II.H. A transmission and distribution utility that leases or operates facilities under PURA §39.918(b)(1) or procures, owns, and operates facilities under PURA §39.918(b)(2) is on page 70.

- P. 16 TAC § 25.53(e)(2) Generation Annexes**

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

- Q. 16 TAC § 25.53(e)(2)(A) Weather Emergency Annex**

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

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

- R. 16 TAC § 25.53(e)(2)(B) Water Shortage Annex**

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

Low Lake Level  
Demineralized Water Storage  
Effluent make up water

- S. 16 TAC § 25.53(e)(2)(C) Restoration of Service Annex**

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

- T. 16 TAC § 25.53(e)(2)(D) Pandemic and Epidemic Annex**

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

- U. 16 TAC § 25.53(e)(2)(E) Hurricane Annex**

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

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

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

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

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

### III. Record of Distribution

GP&L provided training to 206 employees through its online Learning Management System. Following the training, each employee was given a written test on the contents of the EOP training. Below is a record of when each employee initially received a copy of the EOP and when each completed the training.

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

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

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

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

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

#### **IV. Affidavit**




# AFFIDAVIT

STATE OF TEXAS     §  
COUNTY OF DALLAS     §

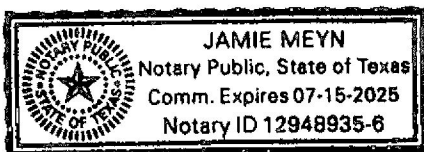
I, Darrell Cline, being duly sworn, state under oath that I am the General Manager and Chief Executive Officer of Garland Power & Light ("GP&L"), a division of the City of Garland ("Garland"), a municipally owned electric utility, and I attest that I am the highest-ranking officer within GP&L with the authority to affirm the following facts (based upon my personal knowledge or the personal knowledge of those who report to me) and opinions (to the best of my belief and based upon reasonable factual inquiry):


- relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operating Plan ("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;
- the EOP has been reviewed and approved by the appropriate executives;
- drills have yet to be conducted for the 2022 calendar year to the extent required by subsection (f) of PUCT Rule 25.53, however, it is anticipated that the drill will be completed during the 2022 calendar year and once the drill has been completed a supplemental filing will be made with the PUCT once the drill has been completed;
- the EOP or an appropriate summary has been distributed, or will be distributed, to local jurisdictions as needed;
- GP&L maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
- GP&L'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.

  
\_\_\_\_\_  
Darrell Cline  
General Manager and Chief Executive Officer  
Garland Power & Light operating as a municipally owned electrical utility of the City of Garland

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

Given under my hand and seal of office this 31<sup>st</sup> day of May, 2022.



  
\_\_\_\_\_  
Notary Public, State of Texas  
Notary ID#: 12948935-6  
Commission Expires: July 15, 2025

## **V. Primary and Backup Contacts**

### **Primary Contacts**

#### Administrative

Darrell Cline  
Electric General Manager and CEO  
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214-681-9816 cell

#### Communications and Public Relations

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972-205-2364 office

### **Backup Contacts**

#### Administrative

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Electric Deputy General Manager and Chief Operating Officer  
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972-205-2217 office  
214-708-3734 cell

## **VI. Redacted Emergency Operations Plan**

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.

## **CONFIDENTIAL - FOR OFFICAL USE ONLY**




**City of Garland  
Garland Power & Light**

# **EMERGENCY OPERATIONS PLAN**

**Effective Date: May 2, 2022**

**This Plan supersedes all previous versions of the  
Emergency Operations Plan.**


Approved:

  
\_\_\_\_\_  
Darrell Cline

  
\_\_\_\_\_  
Date of Approval

Title:


General Manager and Chief Executive Officer

	Document Name	Revision	Revision Date	Page	Classification
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## PREFACE

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

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

## REVISIONS

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

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# **I. EMERGENCY OPERATIONS PLAN**

## **A. Approval and Implementation**


### **1. Introduction**

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

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

The objectives of this EOP are to:

1. Protect the continuity of electric service within the service area by providing an emergency plan to be implemented when there is a forecast or occurrence of events that affect system security.
2. Support the timely and orderly restoration of electric service following disruptions.
3. Protect the safety of GP&L employees and the public during and after emergency operations.
4. Support compliance by GP&L operations during emergency conditions comply with all local, state, and federal regulations and policies as well as all contractual agreements.
5. Maintain communications with GP&L customers to determine service conditions, communicate expected actions and service expectations, and request actions from customers.
6. Inform and coordinate actions and resources between government agencies and regulatory agencies such as the City of Garland Emergency Operation Center, the Public Utility Commission of Texas (“PUC”), North American Electric Reliability Corporation (“NERC”), Federal Energy Regulatory Commission (“FERC”), City Public Safety agencies and the Federal Bureau of Investigation (“FBI”).

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

## 2. EOP Applicability

**All employees are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.**


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

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

[REDACTED]

The EOP applies to the following operational situations:


- a. **Major Storm** – a period of high incidence of outages from the failure of electric transmission and distribution facilities due to trees or other object coming into contact with electric facilities during periods of high winds or icy conditions
- b. **Energy Emergency Alert (EEA)** - An orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an operating condition in which the safety or reliability of the ERCOT electric grid is compromised or

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

- c. **Extreme Cold Weather** – a period of extreme cold weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities
- d. **Extreme Hot Weather** - a period of extreme hot weather in areas where GP&L has generation, transmission or distribution facilities or TMPA has transmission facilities
- e. **Black Start** – restoration of electric service when all or a major portion of the ERCOT electric grid has lost service
- f. **Load Shed** – the intentional removal and restoration of firm load customers at the direction of ERCOT, generally in response to a system emergency.
- g. **Pandemic** – a period when resources, including personnel, may be limited due to widespread disease or other conditions where the limited physical contact between employees and between employees and the public should be maintained
- h. **Sabotage / Terrorism** – response to an act or anticipated act of sabotage or terrorism directed at TMPA Transmission facilities or GP&L facilities
- i. **Heightened Security** – a period of increased security due to elevated threat level
- j. **Extreme Temperature Events** – Weather events that are beyond the normal anticipated climate for the GP&L or TMPA service territory
- k. **Wildfire Events** – a grass or forest fire that has the ability to reduce the quality of electric service to consumers by damaging, degrading or contaminating electric utility facilities
- l. **Cyber Security Events** – an intentional cyber-attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers
- m. **Physical Security Events** – an intentional physical attack on electric utility facilities that has the ability to reduce the quality of electric service to consumers
- n. **Water Shortage Emergency for Generation** – a period when there is a shortage of water to provide cooling for generating units

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

### **3. Individuals Responsible for Maintaining and Implementing the EOP**

#### **a. Hierarchy of Responsibility**

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

#### **b. Maintenance of the EOP**

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

#### **c. Changing the EOP**


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

#### **d. Communications Personnel**

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

#### **e. Implementation of the EOP**

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

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

#### 4. Revision Control Summary

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

#### 5. Supersedes Previous Versions

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


#### 6. Date of Approval

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

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


#### 7. Definitions

- a. **Annex** -- a section of an emergency operations plan or business continuity plan that addresses how an entity plans to respond to the incidence of a specific hazard or threat.
- b. **Black Start** - the recovery from a blackout of a complete or significant portion of the ERCOT electric grid.
- c. **Business Continuity Plan (“BCP”)** – the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in the recovery from an emergency.
- d. **Chronic Condition Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as having a serious medical condition that requires an electric-powered medical device or electric heating or cooling to prevent the impairment of a major life function through a significant deterioration or exacerbation of the person’s medical condition. If that serious medical condition is diagnosed or re-diagnosed by a physician as a life-long condition, the designation is effective under this section for the shorter of one year or until such time as the person with the medical condition no longer resides in the home. Otherwise, the designation or re-designation is effective for 90 days.

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- e. **Control Center** - One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.
- f. **Control Room** – A facility from which operating personnel are able to monitor and control substation or generation equipment located at a single geographic location. Control may be of more than one generating unit or substation as long as they are located at a single geographic location.
- g. **Critical Load** - load for which electric service is considered crucial for the protection or maintenance of public health and safety; including but not limited to Critical Load Public Safety Customers, Critical Load Industrial Customer, Chronic Condition Residential Customer, Critical Care Residential Customer, customers with special in-house life-sustaining equipment, Critical Natural Gas Facilities and Critical Water or Wastewater Customers.
- h. **Critical Load Public Safety Customer** - a customer for whom electric service is considered crucial for the protection or maintenance of public safety, including but not limited to hospitals, police stations, fire stations, and critical water and wastewater facilities.
- i. **Critical Load Industrial Customer** - an industrial customer for whom an interruption or suspension of electric service will create a dangerous or life-threatening condition on the retail customer's premises, is a "critical load industrial customer."
- j. **Critical Care Residential Customer** - a residential customer who has a person permanently residing in his or her home who has been diagnosed by a physician as being dependent upon an electric-powered medical device to sustain life. The designation or redesignation is effective for two years under PUCT Rule 25.53.
- k. **Critical Natural Gas Facility** - a facility designated as a critical customer by the Railroad Commission of Texas under §3.65(b) (relating to Critical Designation of Natural Gas Infrastructure) unless the facility has obtained an exception from its critical status. Designation as a critical natural gas facility does not guarantee the uninterrupted supply of electricity.
- l. **Critical Water or Wastewater Customer** – a water utility facility that has submitted an annual application for designation as a Critical Water or Wastewater customer and has been granted such by the electric utility under TWC §13.1396.

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- m. Drill** - an operations-based exercise that is a coordinated, supervised activity employed to test an entity's EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.
- n. Electronic Security Perimeter (ESP)** – the logical border surrounding a network to which Cyber Systems are connected using a routable protocol.
- o. Emergency** - any incident resulting from an imminent hazard or threat that endangers life or property or presents credible risk to the continuity of electric service. The term includes an emergency declared by local, state, or federal government; ERCOT; or a NERC Reliability Coordinator that is applicable to the entity.
- p. Emergency Operations Plan** - the plan and attached annexes, maintained on a continuous basis by an entity, intended to protect life and property and ensure continuity of adequate electric service in response to an emergency.
- q. Entity**- an electric utility, transmission and distribution utility, PGC, municipally owned utility, electric cooperative, REP, or ERCOT.
- r. ERCOT Emergency Condition** - An operating condition in which the safety or accountability of the ERCOT system is compromised or threatened, as determined by ERCOT.
- s. ERCOT Energy Emergency Alert (EEA)** - an orderly, predetermined procedure for maximizing use of available Resources and, only if necessary, curtailing load during an ERCOT Emergency Condition while providing for the maximum possible continuity of service and maintaining the integrity of the ERCOT System.
- t. Flooding Event** – an event where an overflow of water submerges dry land which is normally dry and causes roadways and bridges to become impassable.
- u. General Hospital** – under Texas Health and Safety Code §241.003(5) means an establishment that:
  - (A) offers services, facilities and beds for use for more than 24 hours for two or more unrelated individuals requiring diagnosis, treatment, or care for illness, injury, deformity, abnormality, or pregnancy, and
  - (B) regularly maintains, at a minimum, clinical laboratory services, diagnostic X-ray services, treatment facilities including surgery or obstetrical care or both, and other definitive medical or surgical treatment of similar extent.

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- v. **Hazard** – a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property.
- w. **Heightened Security** - For the purposes of this document Heightened Security is defined as a condition in which a specific or non-specific threat has been identified against the City of Garland electric utility assets or personnel. This may be a physical threat or a cyber threat.
- x. **Hospital** - Texas Health and Safety Code §241.003(7) defines Hospital as a General Hospital or a Special Hospital.
- y. **Natural Disaster** – a major adverse event resulting from natural processes of the earth; examples include floods, tornados, earthquakes, tsunamis, and other geologic processes. A natural disaster can cause loss of life or property damage, and typically leaves some economic damage in its wake, the severity of which depends on the affected population's resilience or ability to recover.
- z. **Pandemic** – a widespread disease that has the potential to affect the health and ability of the workforce to function normally.
- aa. **Physical Security Perimeter (PSP)** – the physical barrier surrounding locations in which Cyber Assets, Cyber Systems or Electronic Access Control or Monitoring Systems reside, and for which access is controlled.
- bb. **Resource** – an energy storage resource, a generation resource or a load resource.
- cc. **Sabotage** – The GP&L procedures define Sabotage as:
  - Destruction of an employer's property (as tools or materials) or the hindering of manufacturing by discontented workers.
  - Destructive or obstructive action carried on by a civilian or enemy agent to hinder a nation's war effort.
  - An act or process tending to hamper or hurt.
  - Deliberate subversion.Acts of sabotage may be carried out in many different ways. For an incident to be considered an act of sabotage there will be an underlying intent by a person to disrupt, obstruct, hamper, destroy, or hurt people or property.
  - If a person loses control of their vehicle and runs into a utility pole, that is an accident.
  - If a person cuts down a utility pole with a chain saw, that is sabotage.
  - If an employee working mistakenly deletes a computer file that is an accident.

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


**dd. Special Hospital** - per Texas Health and Safety Code §241.003(15) means an establishment that:

- (A) offers services, facilities, and beds for use for more than 24 hours for two or more unrelated individuals who are regularly admitted, treated, and discharged and who require services more intensive than room, board, personal services, and general nursing care;
- (B) has clinical laboratory facilities, diagnostic X-ray facilities, treatment facilities, or other definitive medical treatment;
- (C) has a medical staff in regular attendance; and
- (D) maintains records of the clinical work performed for each patient.

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

## 8. Filing Requirements

- a. A municipal utility must file an EOP under PUCT Rule §25.53 by June 1, 2022. Beginning in 2023, an entity must annually file an EOP no later than March 15 in the manner prescribed by the PUCT.
  - i. An entity must file with the PUCT an Executive Summary of the EOP.
  - ii. An entity must file with the PUCT a redacted copy of the EOP.
  - iii. For an entity with operations within the ERCOT power region, the entity must submit its unredacted EOP in its entirety to ERCOT.
  - iv. Beginning in 2023, the annual EOP must include, for each incident in the prior calendar year that required the entity to activate its EOP, a summary after-action report that includes lessons learned and an outline of changes the entity made to the EOP as a result.
- b. A person seeking registration as a power generation company ("PGC") or certification as a retail electric provider ("REP") must file an EOP with the PUCT at the time it applies for registration or certification with the commission, and must submit the EOP to ERCOT if it will operate in the ERCOT power region, no later than ten days after the PUCT approves the person's certification or registration.
- c. Updated filings. An entity must file an updated EOP with the PUCT within 30 days under the following circumstances.
  - i. An entity must file an updated EOP if PUCT staff determines that the entity's EOP on file does not contain sufficient information to determine whether the entity can provide adequate electric service through an emergency.

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

## 9. How to Use This EOP

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


This EOP is divided into twelve parts:

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

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

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

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

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

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

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


## 10. Essential Functions of GP&L

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

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

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

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

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

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


## **B. Communications Plan**

### **1. Handling Complaints**

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

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

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

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## **2. Communicating with the Public**

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

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

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

## **3. Communicating with the Media**


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

## **4. Communicating with the Customers**

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

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

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

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

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

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

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

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

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


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

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

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

## **8. Communicating with ERCOT**

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

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

## 9. Communicating with Critical Load Customers

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

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

## 10. Communicating with Critical Fuel Suppliers

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

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

## 1. Lists of Supplies

[REDACTED]


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

## 2. GP&L Transmission and Distribution

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

## 3. GP&L System Operations

- [REDACTED]
- [REDACTED]

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#### 4. GP&L Communications

[REDACTED]

### D. Staffing during Emergency Response

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

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

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


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

#### 2. GP&L System Operations

- [REDACTED]

#### 3. GP&L Communications

- [REDACTED]
- [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

## 5. Drought


[REDACTED]

[REDACTED]

[REDACTED]

## 6. Flooding

[REDACTED]

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## F. EOP Implementation

### 1. Activation of EOP


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

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

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

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

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

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## II. TRANSMISSION AND DISTRIBUTION ANNEXES

### A. Weather Emergency Annex

#### 1. Cold Weather Emergency

##### a. Operational Plans


[REDACTED]

[REDACTED]

##### i. Weather Awareness

[REDACTED]


[REDACTED]

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**ii. Weather Preparedness**

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

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**b. Checklist for Transmission and Distribution Facility Personnel**

**i. Lessons Learned from Past Weather Emergencies**

[REDACTED]  
[REDACTED]

**ii. Materials**

[REDACTED]

**iii. Fuel**

[REDACTED]  
[REDACTED]

**iv. Food and Water**

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

**v. Boarding**

[REDACTED]

**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.

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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.

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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]

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**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.

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**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.

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## 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.

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**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]

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[REDACTED]

[REDACTED]

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

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

1. [REDACTED]  
 2. [REDACTED]  
 3. [REDACTED]  
 4. [REDACTED]

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

[REDACTED]  
 [REDACTED]

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

■ [REDACTED]  
 [REDACTED]  
 [REDACTED]



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### 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.

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#### **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.

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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.

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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

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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

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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.

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**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.

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## **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.

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**c. Modifications to Sick Leave Policy**

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

**d. Telecommuting**


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

**3. Pandemic Preparedness Action Levels**

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

**b. Level 2 - Reduce exposure to critical operations personnel**

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

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- [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]

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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.

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■ [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]

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**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]


**d. Wholesale Customer Billing**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**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]


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

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## **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”).

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## **F. Cyber Security Incident**

### **1. Cyber Security Incident Response**


[REDACTED]

[REDACTED]

[REDACTED]

### **2. Declare Incident**

[REDACTED]

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### 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]

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[REDACTED]

[REDACTED]

**b. Identify Anomalous Activity**

[REDACTED]

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**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]

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

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


- [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]

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- [REDACTED]


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

[REDACTED]

## 9. Eradication

[REDACTED]

- [REDACTED]

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[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]

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[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.

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**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.

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1. *Journal of the American Medical Association*, 2000; 284: 2689-2695.

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.

Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

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## 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]
    - [REDACTED]

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[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.

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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]

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## 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.


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

[REDACTED]

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### 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]

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Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

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**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]

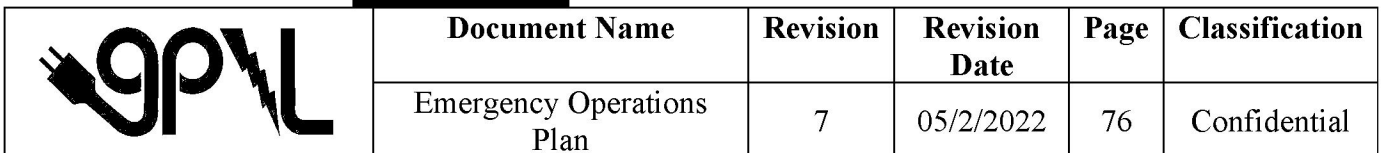
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

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[illegible]

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- [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]

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## 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]

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## **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]

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## **D. Pandemic and Endemic Annex**


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

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## E. Hurricane Annex




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## **F. Cyber Security Annex**


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

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## **G. Physical Security Annex**

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

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## 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.

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## 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.

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- (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.

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## 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:

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- (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;

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- (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:

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- (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

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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

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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;


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- (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.

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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

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## Appendix B – City of Garland Pandemic Response Directive

 <b>GARLAND</b> <b>Directive</b>	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.

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- 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.

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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.

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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.

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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.

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## 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:

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(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.

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## 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

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**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)

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## 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

<b>Section 1: Submitter's Contact Information</b>
First Name: _____ Last Name: _____
Email Address: _____
Phone: (____) _____
<b>Section 2: Customer Contact Details</b>
Name (if different from above): _____
Contact Title: _____
Mailing Address: _____
City: _____ State: _____ Zip Code: _____
Phone: (____) _____ Secondary Phone: (____) _____
Email Address: _____
<b>Section 3: Service Address Information</b>
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>

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#### 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 a completed form:

Submit


#### 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: \_\_\_\_\_

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