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May 31, 2022

Ms. Jasmine Kirkland
Central Records
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, TX 78701

RE: Project No. 53385, *Project to Submit Emergency Operations Plans and Related Documents under 16 TAC§ 25.53*

Dear Ms. Kirkland:

Enclosed for filing please find the following:

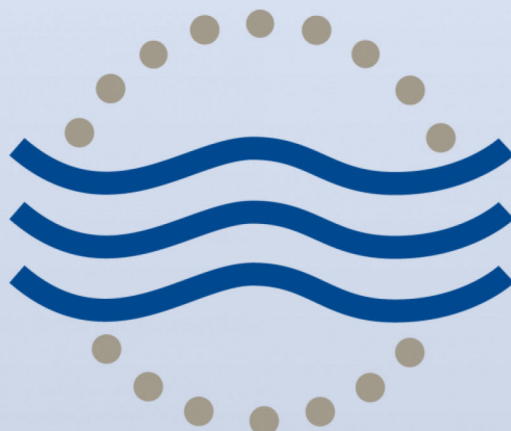
1. Brownsville Public Utilities Board's Public Utility Commission of Texas Emergency Operations Plan ("BPUB's PUC EOP") (redacted).
2. Executive Summary of BPUB's PUC EOP pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i), including the redacted List of Emergency Contacts filed pursuant to 16 Tex. Admin. Code § 25.53(c)(4)(A) and (B).
3. CONFIDENTIAL – Executive Summary of BPUB's PUC EOP pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i), including the unredacted List of Emergency Contacts filed pursuant to 16 Tex. Admin. Code § 25.53(c)(4)(A) and (B), filed separately under seal.

If you have any questions about this filing, please do not hesitate to contact me at (956) 983-6314 or gleal@brownsville-pub.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gustavo C. Leal".

Gustavo C. Leal
Brownsville Public Utilities Board
NERC Compliance Manager & CCO



B R O W N S V I L L E
PUBLIC UTILITIES BOARD

Emergency Operations Plan

May 27, 2022

P.O. Box 3270 Brownsville, TX 78523-3270

(956) 983-6100

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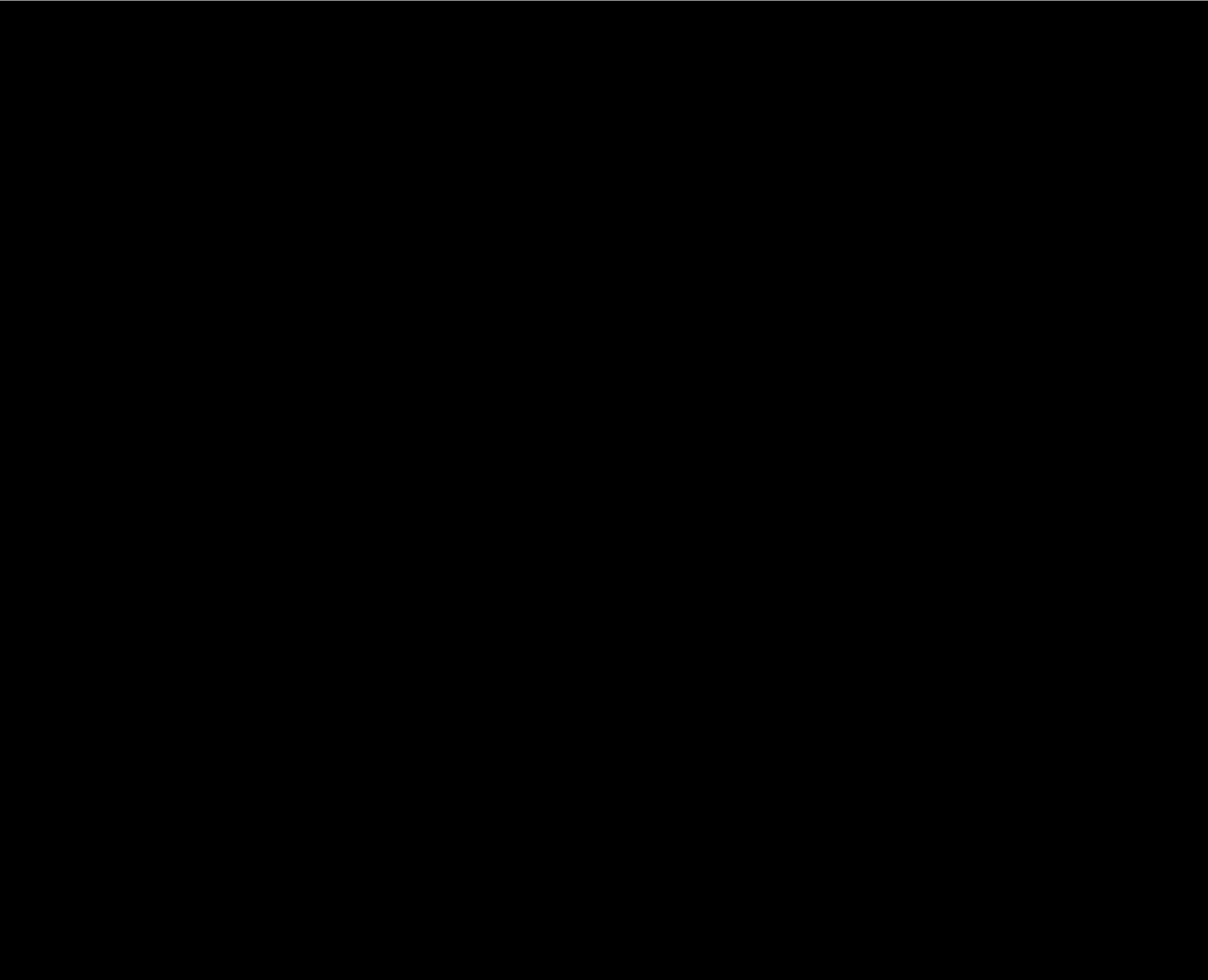
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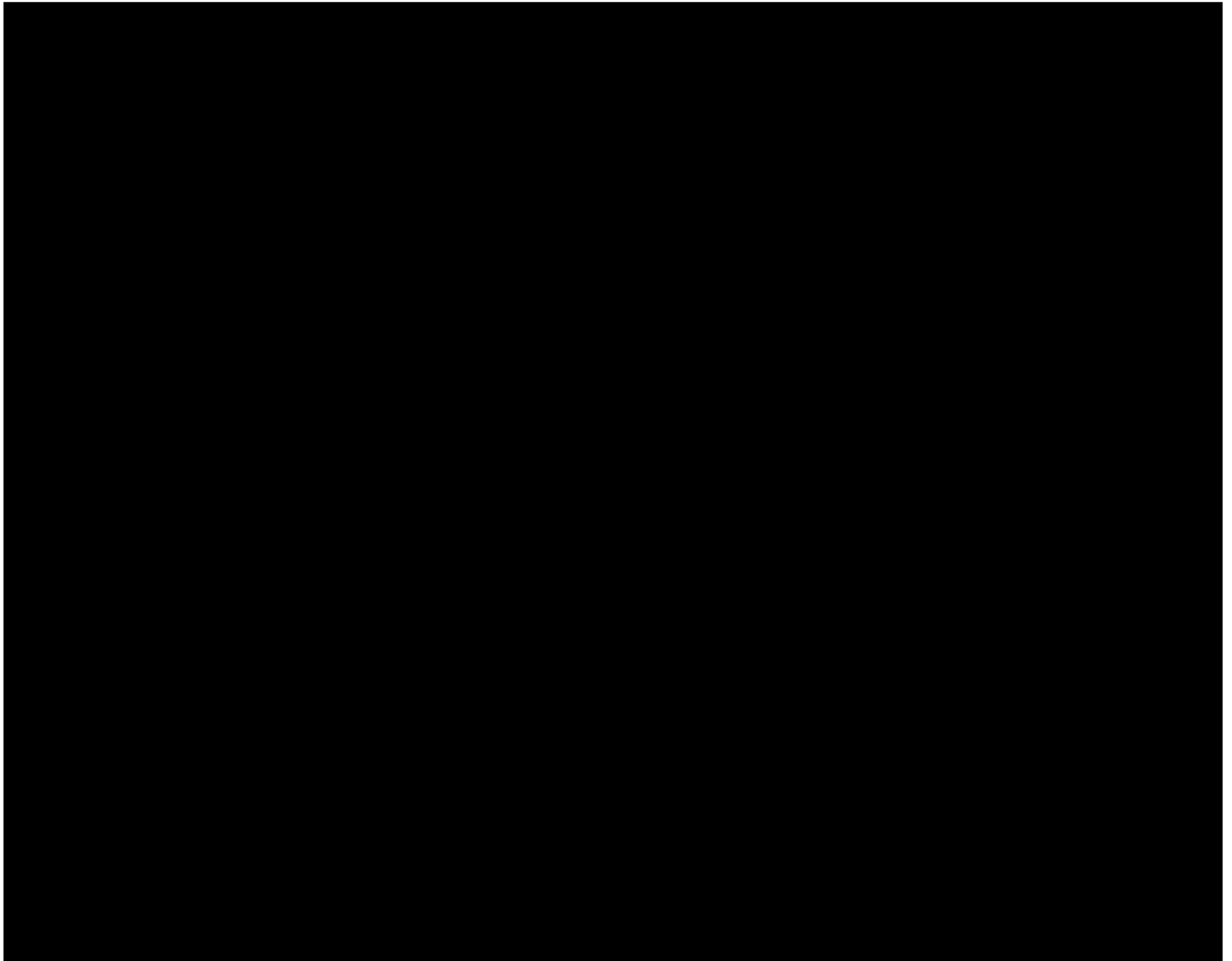
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I. CHANGE RECORD

BPUB will review the Emergency Operations Plan annually and will make changes as necessary for any updates.



IIA. RECORD OF DISTRIBUTION-INTERNAL



IIB. RECORD OF DISTRIBUTION-EXTERNAL

<u>Distribution Date</u>	<u>Number of Copies Delivered</u>	<u>Method of Delivery</u>	<u>Name, Title and Organization of Receiver</u>
<u>5/31/2022</u>	<u>1</u>	<u>PUC Interchange Filer</u>	<u>The Public Utility Commission of Texas</u>
<u>5/31/2022</u>	<u>1</u>	<u>ERCOT MIS</u>	<u>The Electric Reliability Council of Texas</u>

III. MESSAGE FROM GENERAL MANAGER AND CEO

Operating safely and effectively during emergency situations is extremely important to the BPUB Board and management. In times of emergency events, BPUB electricity customers depend on BPUB staff to restore service rapidly and to provide accurate and timely information. BPUB staff should have clear procedures to ensure safety is maintained at all times. This is particularly true during difficult and often times very fluid situations.

Our Emergency Operations Plan (EOP) is a guide and resource developed to provide structure and integrated policies and procedures to direct our Emergency Operations coordinators, managers, supervisors and frontline employees during all types of emergency conditions and situations.

The EOP is important to not just our frontline operations but to all of our staff as we are all essential workers. BPUB management's task is to work with staff to ensure they understand the EOP, are trained appropriately on the EOP, and enable avenues in which they can ask questions about the EOP. Every department and every BPUB employee has a part to play.

I am confident that each BPUB staff member is capable of performing at the highest-level during emergency events. Thank you for your commitment to safety, emergency response and serving our customers.

John S. Bruciak, PE

General Manager & CEO

IV. SAFETY & INCLEMENT WEATHER STATEMENT

BPUB has preparation plans for responding to a cold or hot weather emergency and associated checklists for generation, transmission, and distribution facility personnel to use during cold or hot weather emergency response. These checklists include lessons learned from past weather emergencies and drills to ensure necessary supplies and personnel are available through the weather emergency. Generally, these are the steps that BPUB will take 72 to 96 hours prior to an anticipated weather event. All Departments have preparations that will be made to support emergency operations ahead of a hot or cold weather event to support BPUB's transmission, distribution, and other systems.

V. BPUB ELECTRICAL SYSTEM INFORMATION

The Brownsville Public Utilities Board (BPUB) was formed in 1960 by the City of Brownsville Charter to provide electric, water, and wastewater services to its customers in the Brownsville area. Pursuant to the City's Charter, management, operation, and control of the City's combined water, wastewater, and electric utilities system is delegated to the BPUB. The electric system provides retail electric service through its electric facilities to consumers inside and outside the city limits. The existing customer service area of the electric facilities encompasses approximately 133 square miles of Cameron County, including substantially the entire City (estimated by the BPUB at over 96%). The electric system serves a growing base of approximately 53,000 customers and serves a peak load of 282.68 MW. Current resources, mainly owned by the BPUB, are sufficient to cover peak demand.

The BPUB meets its power supply obligations through a combination of resources:

- Operation of the Silas Ray Power Production Facilities owned and operated by the BPUB. The facilities are composed of one conventional steam turbine unit and a re-powered steam turbine in Combined Cycle with a Westinghouse CW-251 B12 combustion turbine and a GE LM6000 gas turbine generator for an estimated gas fired capability of 115 MW.
- Operation of the Calpine/Hidalgo combined cycle Power Plant in which the BPUB has an ownership interest entitling it to 105 MW of capacity.
- A Power Purchase Agreement with Exelon Corporation entitling the BPUB to purchase 78 MW of renewable energy.
- A Power Purchase Agreement with AEP Energy Partners Inc. entitling the BPUB to an estimated 65 MW of energy.
- Economy energy purchases through an economy power interchange arrangement.
- 14 Electrical Substations
- 47.31 miles of Transmission Lines (138kV & 69kV)
- 391.14 miles of Primary Overhead Distribution Lines
- 346.95 miles of Primary Underground Distribution Lines

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1. INTRODUCTION

§25.53(D)(L)(A) - INTRODUCTION OF EOP AND OUTLINES APPLICABILITY

§25.53(D)(L)(C) - REVISION CONTROL SUMMARY

§25.53(D)(L)(D) - SUPERSEDES PRIOR EOPS

§25.53(D)(L)(E) - PLAN APPROVALS

This Emergency Operations Plan (EOP) is a key component in the BPUB's emergency management planning process and supports the BPUB's intent to respond to any emergency situation in a safe, effective and timely manner. BPUB maintains the EOP in anticipation of natural disasters or emergency situations involving curtailment or major interruptions in electrical service. The EOP sets forth organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts and vendors. This EOP supersedes any prior BPUB EOP.

The purpose of the EOP is to provide BPUB management and personnel with the information needed to manage an emergency event or situation and addresses both common operational functions that are relevant across emergency types and annexes that outline the entity's response to specific types of emergencies.

BPUB maintains this EOP in anticipation of natural disaster or situations involving curtailment or major interruptions in electrical service. The EOP sets forth organizational and personnel assignments, describes emergency communications procedures and lists emergency contacts. As emergencies are often sudden and without warning, these procedures, while providing guidance, are designed to be flexible in order to permit the BPUB staff to respond to any given situation.

The EOP is maintained by the NERC Compliance Manager and Acting Risk Manager. These staff are also authorized to make changes and/or revisions to the EOP.

The EOP aligns with ERCOT procedures for shedding load on a rotating schedule and identifies priorities for restoration of service. The EOP also includes sections that will ensure that BPUB personnel understand what to do in advance of a predictable emergency and how key roles and responsibilities will be assigned and performed during emergency events and situations. The EOP provides guidelines for the BPUB to follow in order to share information efficiently and provide access to critical business and operational information with neighboring utilities, BPUB members, and the community.

Specifically, this plan was developed to:

- Provide the structure and processes to guide the organization during emergency conditions and situations.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing BPUB's human and physical resources, and if necessary, by securing and utilizing outside resources.

- Enable BPUB, neighboring utilities, and the community to share information efficiently and provide access to information critical to business and operations.
- Ensure that BPUB complies with the regulatory requirements related to emergency operations and emergency response.

This is the initial EOP prepared by BPUB for submission to PUCT; therefore, it does not supersede a previously prepared EOP. It aggregates and summarizes pertinent components of existing BPUB plans and policies as cited herein. This EOP does not supersede these reference documents, but relies upon their updates during the administrative cycle of review and revision.

2. DECLARATION OF EMERGENCY EVENT/INCIDENT

This EOP provides structure, procedures, and tasks related to BPUB's response to various types of possible emergency events and incidents and gives the General Manager (GM) & CEO or the GM's Designee the responsibility and discretion to declare a situation, event, or incident as an "Emergency."

The GM is authorized to activate the EOP and the Emergency Operations Center (EOC) when they deem necessary due to an emergency or disaster event is imminent affecting operation of the BPUB facilities. The Assistant GM/COO has authority to activate the EOP/EOC in the GM's absence.

BPUB will utilize an Incident Command System (ICS) structure to manage an emergency in coordination with oversight by BPUB management. This will ensure that there are clear roles and responsibilities for each event.

The Incident Commander (IC) is responsible for completing an Emergency Declaration and Tracking Form. This form will document the time, scope, and expected duration along with other key documentation of the event. If an emergency event changes types and levels, this form will reflect these and other changes in status and relevant information regarding the Emergency.

The designation of an event or incident as an Emergency will generally fall into the following types and levels:

1. Pre-Emergency Preparation
 - a. BPUB continues to conduct normal business while individuals responsible for emergency preparation tasks initiate these preparatory tasks.
 - b. Typically lasts up to 24 to 72 hours and may escalate if forecasts or actual events unfold or if corrective measures are not timely and effective.
2. Significant Event(s)
 - a. The event is significant in a limited area. The loss or curtailment of service affects a limited area of the system and should be corrected within 24 hours (for example, a disruption of electric service in one or more districts, with power being restored to all areas within 24 hours).
3. Major Event(s)
 - a. A segment of the BPUB service area has experienced a power interruption or other significant business disruption in excess of 24 hours, or where the need for power restoration requires the suspension of normal fieldwork.

- b. Major Events are severe but not yet catastrophic. This type of Emergency needs to be monitored closely to determine if, in fact, it will escalate to a catastrophic condition.
 - c. Major Events are expensive and can include problems like loss of critical components of the electric infrastructure such as substations, transmission assets and large amounts of BPUB's distribution system. This could include loss of BPUB's ability to conduct business.
- 4. Catastrophic Event(s)
 - a. A Catastrophic Event can occur when a significant portion of the electric system is lost due to a natural or man-made disaster.
 - b. In a Catastrophic Event, the organization will experience significant economic loss if the event lasts longer than 72 hours.
- 5. Recovery
 - a. After an Emergency, the BPUB will require a time period to return to normal operations.
 - b. The IC will work with key management staff to organize the recovery tasks, reporting tasks and other related operational and business actions required for the full recovery of the system and operations.

3. MAINTENANCE AND IMPLEMENTATION OF EOP

§25.53(D)(L)(B) - MAINTENANCE AND IMPLEMENTATION OF EOP

The EOP Committee comprised of various employees and members of management from across the BPUB is responsible for coordinating systematic updates of the EOP.

Beginning in 2023, BPUB must annually update information included in the EOP no later than March 15 under the following circumstances:

1. In the previous calendar year BPUB made a change to the EOP that materially affects how BPUB would respond to an emergency must file with the commission an executive summary that:
 - a. describes the changes to the contents or policies contained in the EOP;
 - b. includes an updated reference to specific sections and page numbers of the EOP that correspond with the requirements of the 25.53 rule;
 - c. include the record of distribution that contains the following information in table format:
 - i. titles and names of persons with BPUB receiving access to and training on the EOP; and
 - ii. dates of access to or training on the EOP, as appropriate.
 - d. contains the affidavit from BPUB'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 BPUB maintains a General Emergency Plan that is used as its business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
 - vi. BPUB'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 (NIMS) training.

- e. file with the commission a complete, revised copy of the EOP with all confidential portions removed; and
- f. submit to ERCOT the revised unredacted EOP in its entirety.

4. DRILLS AND EXERCISES

§25.53(F) - DRILLS

Each year, BPUB staff participate in exercises and drills in order to better prepare for an emergency or disaster event. Prior to hurricane season, BPUB ensures that they have the required internal materials on hand, as well as commitments for external resources that may be needed following a storm. Additionally, BPUB ensures that the proper critical facilities (i.e., hospitals, water and wastewater treatment plants, and fire stations) are identified.

The drills/exercises cover the following areas:

- Procedures when there is an approaching severe weather event or hurricane.
- Review of planned and existing transmission outages to be canceled and/or restored.
- Review of emergency operating procedures, evacuation plans, and possible need to staff back-up facilities.
- Testing of TOs and QSEs prior to storm making landfall.
- Testing of communication methods.
- Review of load shedding plans and the need to shed load if instructed by ERCOT.
- Expectations that occur for BPUB facilities during a severe storm.
- ERCOT communications to report transmission outages and any other issues.
- Precautionary actions to take prior to arrival of a severe storm.
- System status conditions that are surveyed following a severe storm.
- Purpose of ground indicator lights and actions taken if recognized

Drills/Exercises that have been conducted by BPUB in the past two years are:

- Severe Weather Drill (September, 2021)
- Hurricane/Tropical Storm Drill (July, 2021)

Following each of the drills, BPUB staff developed lessons learned and incorporated those changes into updated emergency response plans.

5. LIST DIRECTORY

Lists and other readily accessible contact information are important during emergency events and situations. The BPUB EOP is designed to have all lists, contact information and other relevant reference information in the Appendix Section(s) of the EOP. The List Directory provides the name of the list (or document) along with the position / staff member in the organization that is responsible for keeping the list current, along with the timeframe for updating the lists, contact information and other relevant reference information.

The List Directory is maintained by the NERC Compliance Manager and Acting Risk Manager. The Lists will be reviewed and updated at least annually.

Lists include:

- BPUB Organization Chart
- Governmental Agencies
- Critical Load Program Contacts
- Media Contacts
- Telecommunication and IT/OT Vendors
- Line Construction
- Right-of-Way Contractors
- Service Providers
- Regional Utility Contacts
- Materials Vendors
- Emergency Contacts (First Responders)

6. MUTUAL AID ASSISTANCE

Mutual aid assistance is the provision of resources to another entity in an emergency through established agreements with the expectation of reimbursement for the costs associated with that assistance. The BPUB has entered several agreements to provide and receive mutual assistance. In both instances, the primary objective is to facilitate rapid, short-term deployment of emergency support.

The Federal Emergency Management Agency (FEMA) recognizes mutual aid agreements between requesting and providing entities, and statewide mutual aid agreements wherein the State is responsible for administering the claims for reimbursement of providing entities. In addition, FEMA recognizes the standard mutual aid agreements as a valid form for use between member states. Therefore, when a pre-event written agreement exists between a requesting entity and a providing entity, the providing entity may be reimbursed through the requesting entity. This applies to both Intra-State and Inter-State Agreements as long as both are mutual aid participants.

BPUB maintains perennial contracts with Lower Colorado River Authority, Austin Energy, Denton Utilities, South Texas Electric COOP, and the American Public Power Association (APPA). Every year before Hurricane Season or an Emergency, the Staging Area Manager contacts the Mutual Aid participants to discuss the mutual aid agreement and make sure that they are available to assist if they are not affected by the same emergency. If the Staging Area Manager determines that the BPUB needs outside assistance, they will coordinate with the IC to make any formal requests of outside utility assistance.

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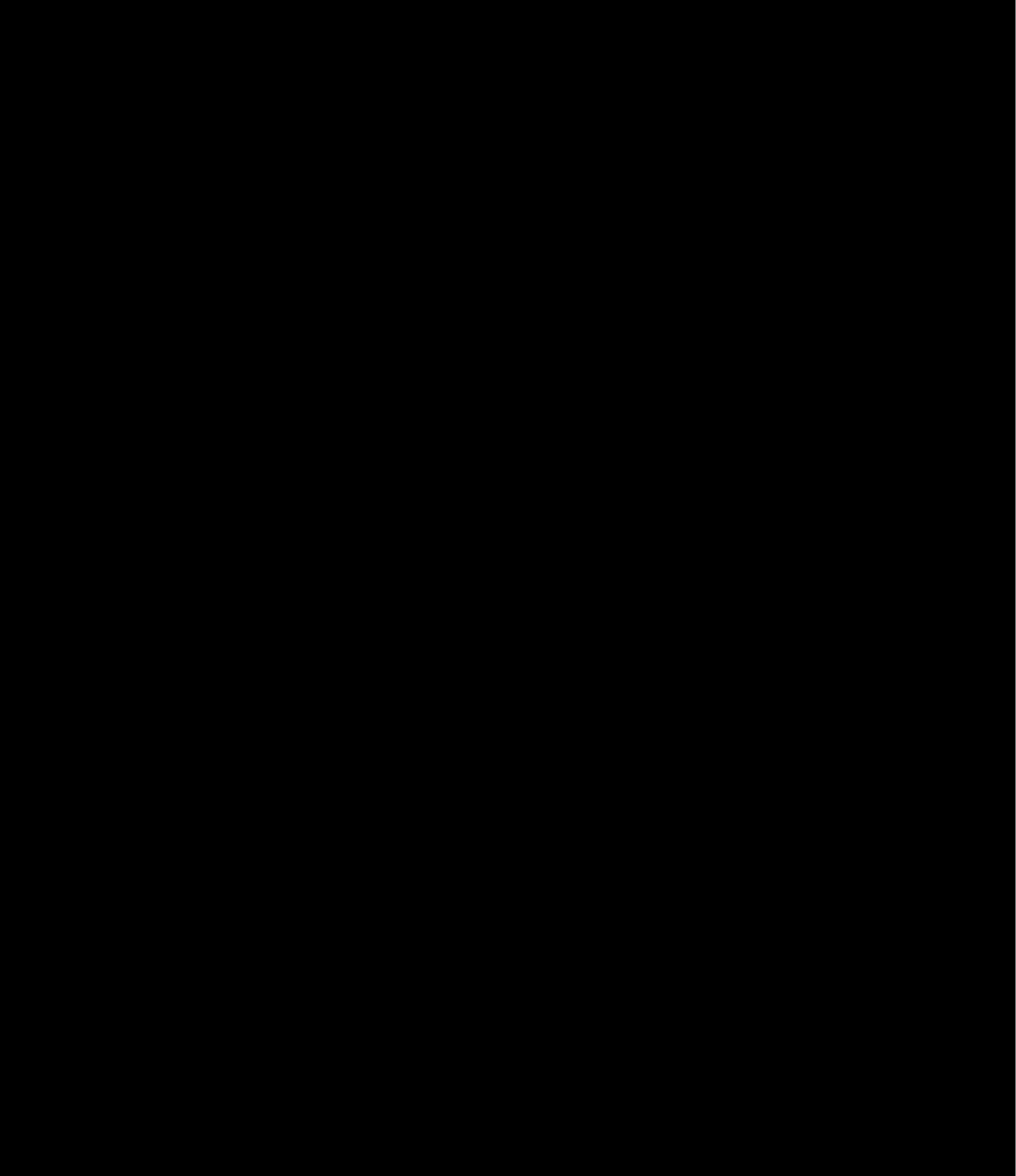
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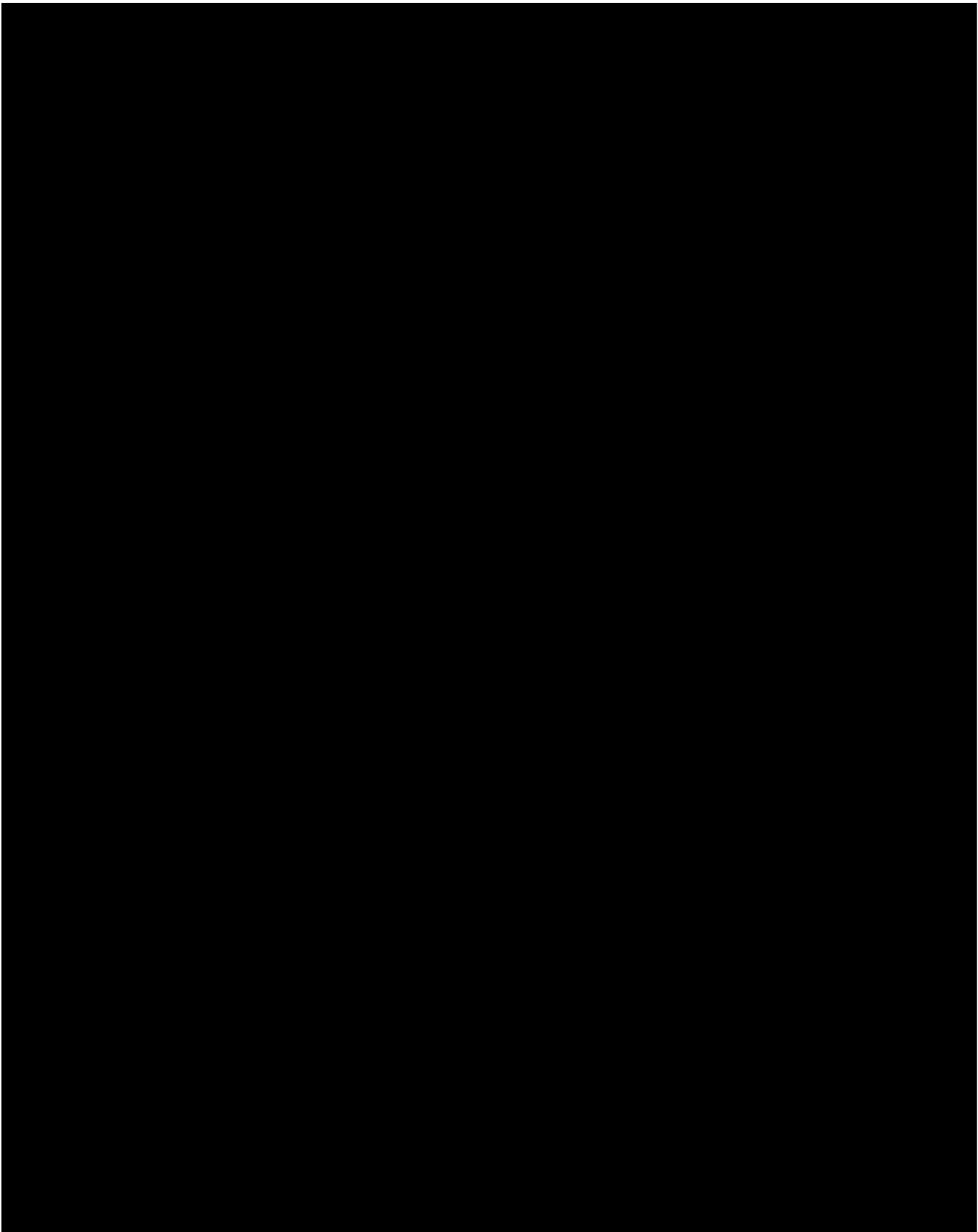
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7. EMPLOYEE ASSIGNMENTS

Upon designation of a declared emergency event, employees should continue to report for duty at their regular locations and receive their EOP work assignments from their immediate supervisors.





8. EMERGENCY OPERATIONS CENTER

The BPUB Emergency Operations Center (EOC) is the primary coordination body for all response and recovery efforts, and when activated, requires representation by all divisions. The EOC is organized along ICS best practices to develop and execute response and recovery objectives. Organized in this way, the EOC efficiently facilitates internal and external communication and collaborative decision making. The EOC creates response strategies, ensures continuity of the organization, and tracks data and results and disseminates information.

The EOC serves as a coordination point for staff with emergency management assignments. It serves to coordinate communication with other members of the Emergency Operation Teams, external authorities, support personnel, customers, vendors, and utilities.

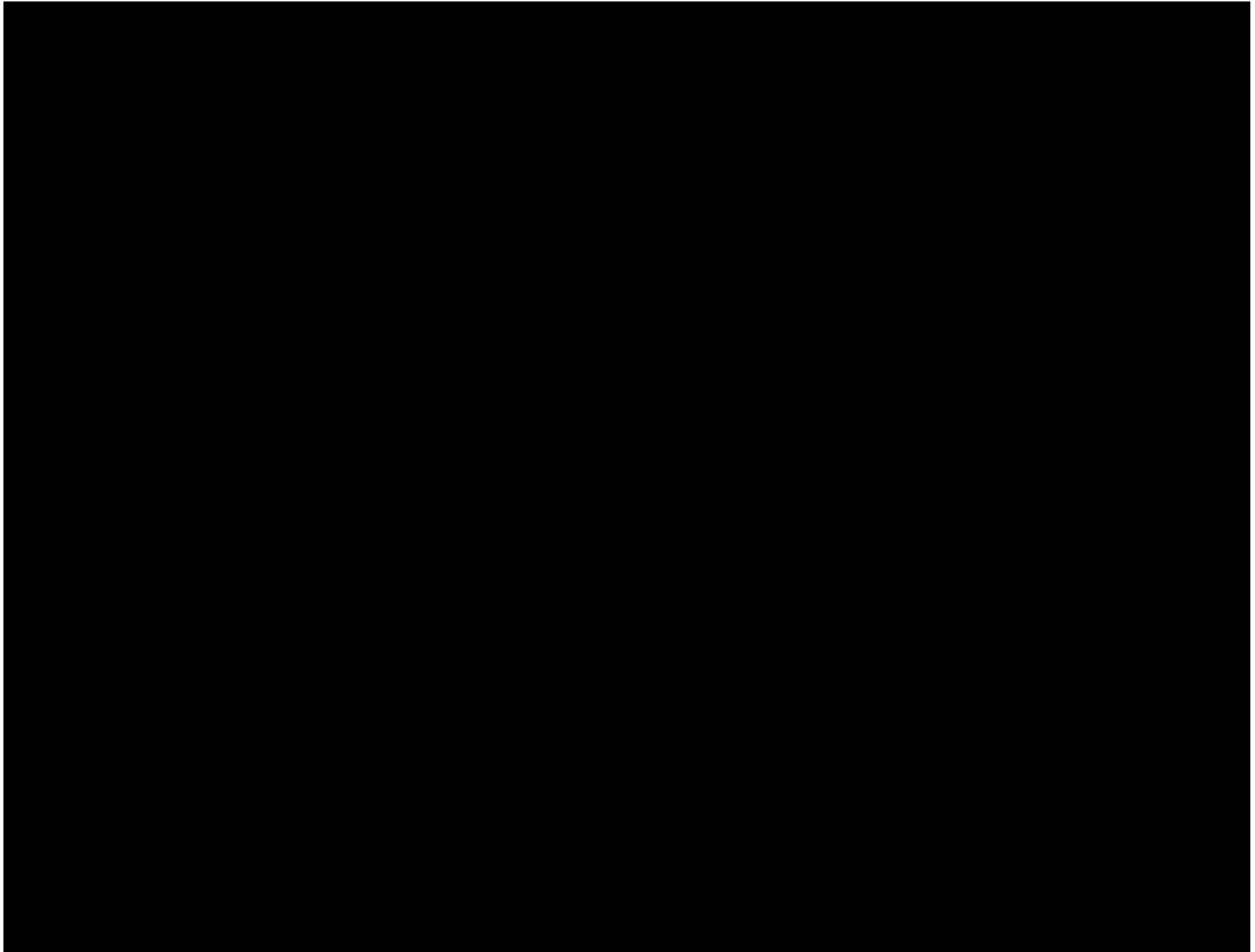
The EOC:

1. Supports the Incident Commander,
2. Provides advice and input for major decisions, and,
3. Implements action plans in a coordinated and effective way.

The location of the EOC must have the space and functionality to support an immediate full activation of the EOC with all positions staffed. It needs to be a safe, secure, and selectively accessible location with a reliable power supply and communication and internet hardware and connectivity. Supplies and equipment for the EOC should be identified in advance with appropriate checklists maintained ready. Use of the EOC will be exercised periodically.

BPUB activates an EOC depending upon the anticipated scale of the weather-related emergency, and regional impact to BPUB. The staffing includes representatives from all critical functions throughout BPUB to ensure adequate coordination and management of the event, which includes operations and support personnel. The EOC will continue to remain operational until such a time as the Incident Commander declares that the EOC can operate at a reduced capacity or be stood down for return to normalized operations. The BPUB ICS Structure is shown in Table 8.1 below.

Table 8.1 BPUB Incident Command System Structure



EOC Organization

The EOC is staffed through best practices of NIMS, which include a multi-tiered ICS emergency organization utilizing task specific emergency response functions that can be activated as needed. This model is scalable depending on the impact of the emergency. Organizing under the ICS is highly desirable in emergency response operations of all types and complexities. The ICS uses only those resources based on the incident and response level needed. It provides a common framework based on a flexible and scalable response organization. Flexibility and scalability of the ICS allows the BPUB to accommodate various staffing levels in responding to the different types and levels of emergencies.

Some general ICS guidelines and assumptions include:

- ICS is flexible and should be viewed as a response tool, not a response rule.
- ICS is scalable to any magnitude of disaster and can include multiple agencies.
- One individual can fill multiple ICS functions, particularly in the early stages of an incident.
- ICS administration should not detract from response effort.
- Command Staff should possess emergency response decision-making authority.
- Training and exercising ICS is critical to its success.
- Other responding agencies also follow NIMS and ICS.
- All levels of the ICS organization may be fully or partially activated to accommodate the requirements of the emergency.

9. COMMUNICATIONS PLAN

§25.53(D)(2)(A) - COMMUNICATIONS PLAN FOR TRANSMISSION AND DISTRIBUTION

§25.53(D)(2)(B) – COMMUNICATIONS PLAN FOR GENERATION

BPUB management recognizes the importance of effective communication during the normal course of business, as well as during an emergency. Communication affects the development of events and shapes the crisis response. Crisis communications must therefore be considered an integral part of emergency management: a core function. The public expects credible organizations to communicate before, during and after a crisis, and inadequate communication has always aggravated crises and led to lack of confidence in public authorities and long-standing companies. It is vital to determine, depending on the type of crisis and resources available, how the crisis communications plan will be organized and run.

This Communications Plan pertains to Generation, Transmission, and Distribution operations.

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10. PRE-ARRANGED SUPPLIES PLAN

§25.53(D)(3) - PRE-IDENTIFIED SUPPLIES FOR EMERGENCY RESPONSE

This section of the EOP provides guidelines for the procurement, storage, and maintenance of supplies that BPUB may need during emergency events. BPUB maintains inventories to support on-going construction and operation of the electrical systems, as well as emergency inventories, in the event of a natural disaster or disruptions of electrical service to customers. Plans are in place and monitored to assure inventory to replace transformers, circuit breakers, substations, and the various components of the transmission, distribution and generation electrical infrastructure. In addition to the inventory necessary to support construction and maintenance projects, a dedicated separate emergency storm stock is maintained in the warehouse.

Guidelines are included to provide BPUB personnel (and contractors) with sufficient supplies to support emergency operations during all types and levels of emergency events. The guidelines ensure a process to procure, store, and maintain supplies that may be needed during emergency events.

Agreements are maintained with suppliers for priority acquisition of critical inventory, if needed in a major disaster. Mutual assistance agreements are maintained to obtain both emergency personnel and equipment if local resources have been expended. See the BPUB Mutual Assistance Agreement Procedure, MAA-100.

11. EMERGENCY STAFFING PLAN

§25.53(D)(4) - STAFFING DURING EMERGENCY RESPONSE

§25.53(D)(4) - STAFFING DURING EMERGENCY RESPONSE

BPUB has a staffing plan for emergencies that addresses BPUB's Control Center, Operations, and other departments. BPUB's IC or designee is responsible for staffing all operations during an Emergency.

The GM or Assistant GM/COO may activate the EOP/EOC due to the following conditions:

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12. SEVERE WEATHER IDENTIFICATION

§25.53(D)(5) - IDENTIFICATION OF WEATHER-RELATED HAZARDS

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13. ANNEXES

13.1 Transmission and Distribution Weather Emergency Plan

§25.53(e)(l)(A) - Weather Emergency Annex

§25.53(e)(l)(A)(ii) - Checklist for Personnel for Responding to Cold/Hot Weather Emergency

In the event of approaching severe weather, including extreme hot/cold temperatures, tornados, snow/ice storms, flooding, wildfires, high wind events, etc., the following procedure pertaining to transmission and distribution operations shall be put into effect by the GM or designee:

Bar Index	Approximate Length (%)
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2	98
3	92
4	68
5	55
6	28
7	18
8	25
9	32
10	30
11	38
12	35
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15	32
16	100
17	92
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13.2 Load Shedding Plan

§25.53(e)(l)(B) - Load Shed Annex

§25.53(e)(l)(B)(i) - Procedures for Controlled Shedding of Load

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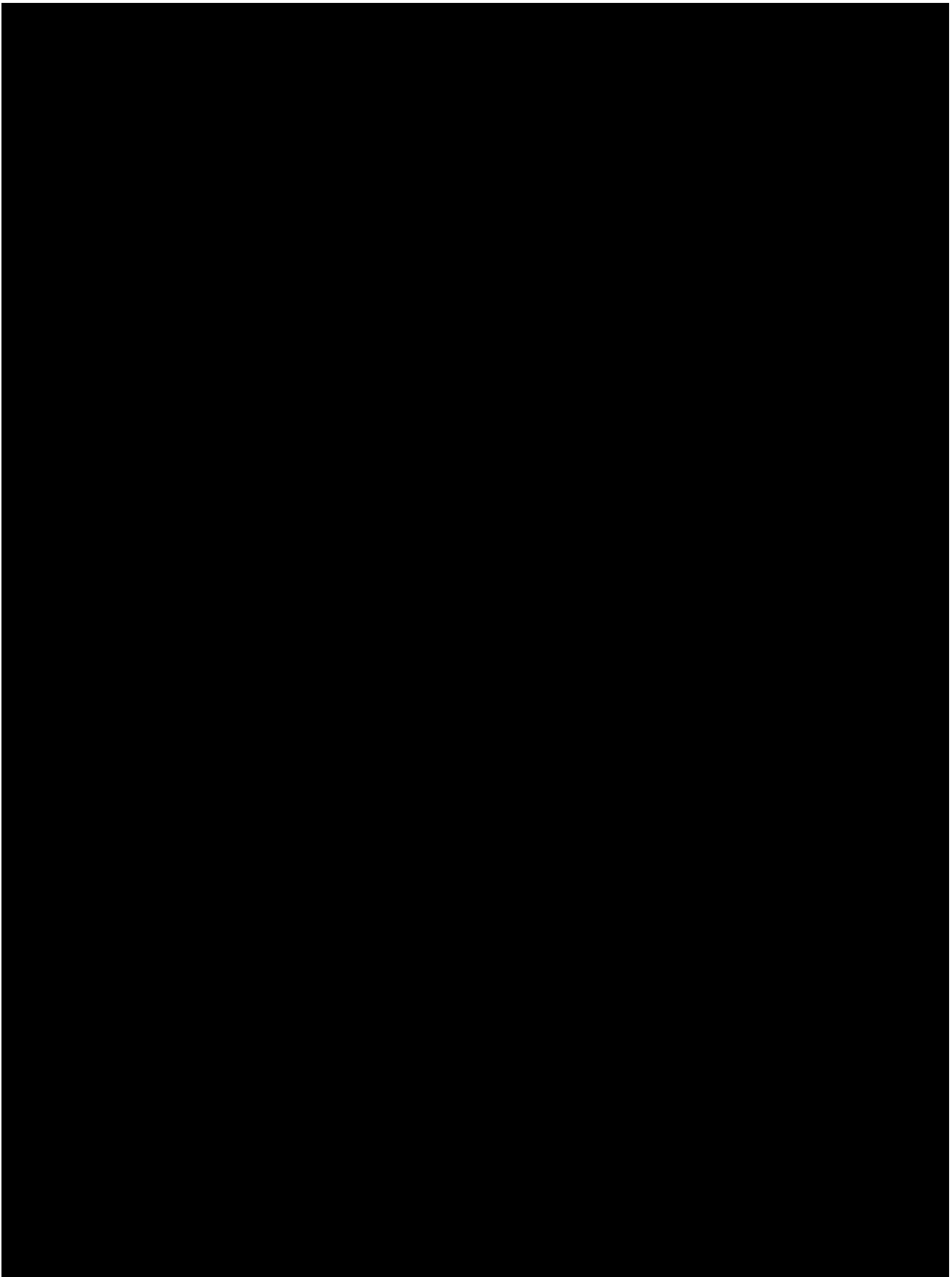
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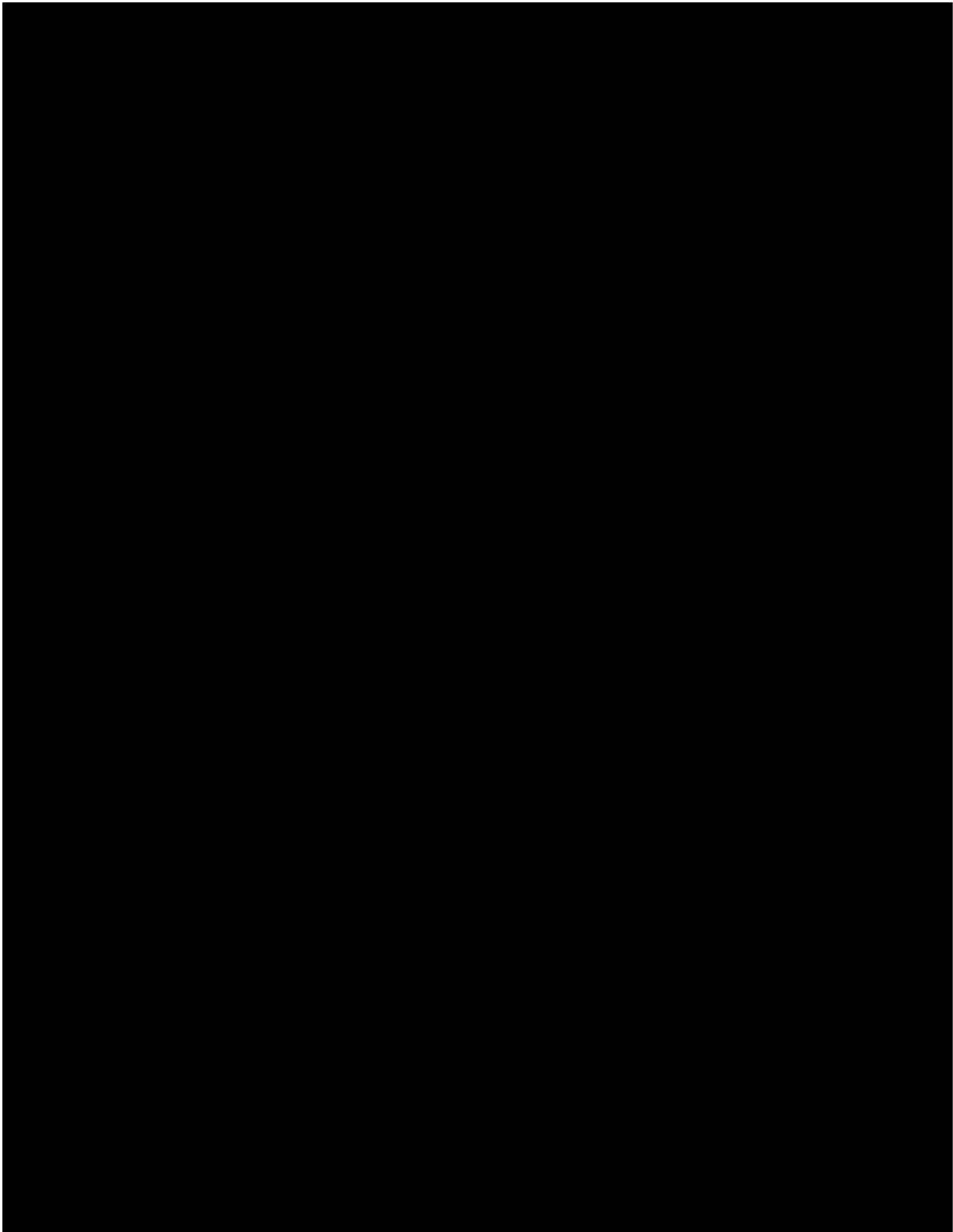
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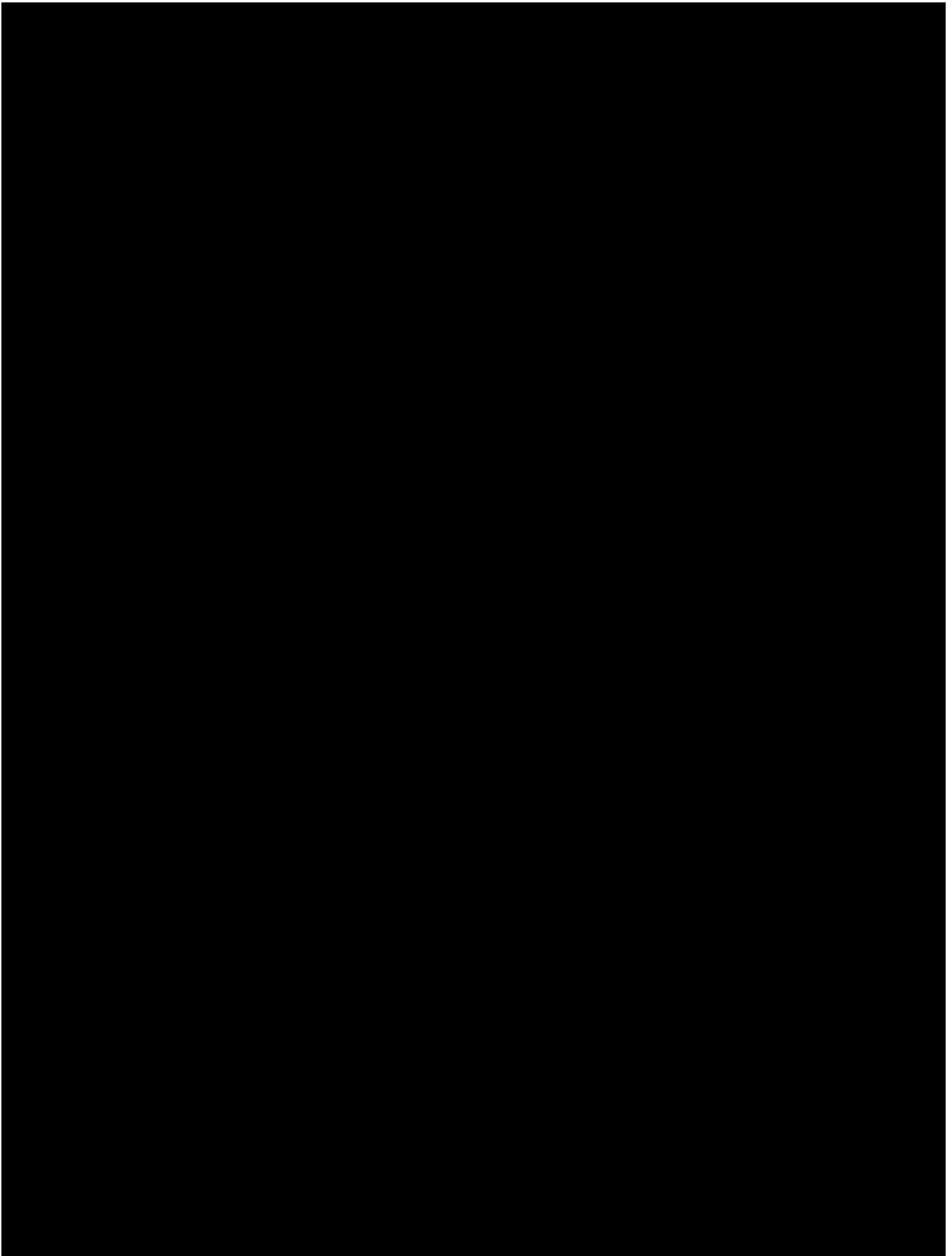
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13.3 Restoration Priorities and Procedures

§25.53(e)(l)(B)(ii) - Priorities for Restoring Shed Load to Service



13.4 Critical Load Program and Medical Necessity Program

§25.53(e)(l)(B)(iii) - Maintenance of Registry of Critical Load Customers

Communicating with all types of critical customers is part of BPUB's normal, daily business operation. BPUB's policies include a Critical Load Program and a Medical Necessity Program. BPUB's Critical Load Program includes nonresidential service locations that can be classified as public safety, industrial, or natural gas infrastructure, and have an approved Critical Load Program application with BPUB. While BPUB's Critical Load Program does not guarantee priority electric service restoration, and locations registered in the Critical Load Program are not exempt from planned service interruptions, for unplanned outages or an Emergency, BPUB will generally prioritize Critical Load Program participants for restoration as much as practicable.

BPUB's Medical Necessity Program includes chronic or critical care descriptions in the BPUB internal lists. BPUB's Medical Necessity Program does not guarantee priority electric service restoration, and locations registered in the Medical Necessity Program are not exempt from planned service interruptions.

Refer to BPUB Critical Load Program for Non-Residential Customers (May 2022) for additional detailed information.

Refer to BPUB Critical Care and Chronic Condition Residential Customers Program (May 2022) for additional detailed information.

13.5 Generation Weather Emergency Plan

§25.53(e)(2)(A)(i) Generation operational plans for responding to cold/hot weather emergency

§25.53(e)(2)(A)(ii) Verification of the adequacy and operability of fuel switching equipment

§25.53(e)(2)(A)(iii) Checklist for Personnel for Responding to Cold/Hot Weather Emergency

In the event of approaching severe weather, including extreme hot/cold temperatures, tornados, snow/ice storms, flooding, wildfires, high wind events, etc., the following procedure pertaining to generation operations shall be put into effect by the GM or designee:

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13.6 Water Shortage for Generation Facilities

§25.53(e)(2)(B) – Water Shortage Annex

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§25.53(e)(2)(C) – To restore to service a generation resource that failed to start or tripped offline
In order to address restoration of generation resources that failed to start or that tripped
offline due to a hazard or threat, BPUB will use the following checklist.

-

13.8 Pandemic and Epidemic Plan and Procedures

§25.53(e)(l)(C) - Pandemic and Epidemic Annex

Determining the existence of a pandemic condition will involve federal, state, and local health officials. BPUB will follow actions required by federal, state, and local officials to protect employee and public health.

Reports of verified infections, the severity of symptoms, location and percentage of population affected, and other information readily available from health officials or news resources will factor into BPUB response. The response to a pandemic condition will vary depending on the severity of the virus and its potential and actual effect on the company. It is very unlikely that a pandemic will originate locally, therefore, it is probable that BPUB will have the advantage of seeing the pandemic conditions originate elsewhere, providing adequate preparation time.

At all times, for generation, transmission, and distribution operations, BPUB will focus on business continuity and maintaining the ability to operate with at least 50% of the workforce working remotely to avoid contact spread. BPUB may implement alternate hours of operation, eliminate group work situations or scale work to essential functions only. BPUB will adjust operations to prevent infected employees from working while maintaining reliable service. Each department will maintain procedures to enable remote work capabilities and provide cross training for redundancy and documentation to ensure essential functions are performed.

The Communication Plan will be followed as applicable in a Pandemic situation to communicate effectively internally and externally.

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13.9 Wildfire Mitigation Plan

§25.53(e)(1)(D) - Wildfire Annex

The Brownsville service area is not at high risk for wildfire threats, but smaller grass fires could present service issues to customers. BPUB maintains guidelines and procedures related to wildfire mitigation and documents policies and practices related to fire prevention and pre-planning, threat mitigation including vegetation control, and responses to fire incidents.

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13.9.4 Restoration of Power in an Active Wildfire Zone

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13.10 Hurricane Preparedness and Response Plan

§25.53(e)(l)(E) - Hurricane Annex (If Facilities Are Located Within A Hurricane Evacuation Zone)

BPUB's Hurricane Preparedness and Response Plan for both generation and transmission operations are based on four key concepts:

1. Continuous daily communication and planning meetings.
2. Appropriate staging of material and resources to avoid system conditions and be ready for post-storm response.
3. Immediate response and deployment once conditions are safe.
4. Unrelenting drive to restore power and return to pre-storm condition.

Each year, BPUB staff participate in hurricane exercises and drills in order to better prepare for a storm event. Prior to hurricane season, BPUB ensures that they have the required internal materials on hand, as well as commitments for external resources which may be needed following a storm. Additionally, BPUB ensures that the proper critical facilities (i.e., hospitals, water and wastewater treatment plants, and fire stations) are identified.

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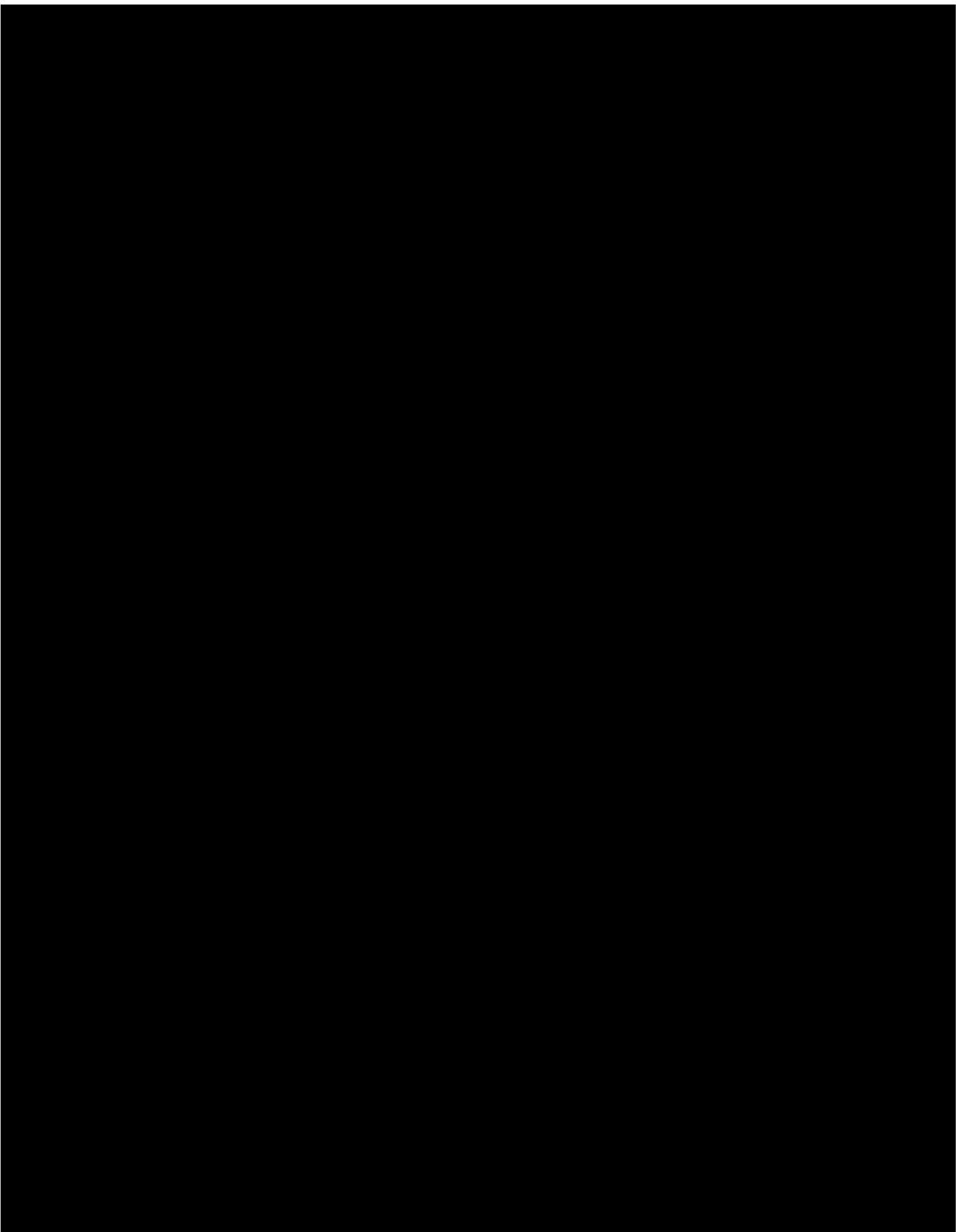
13.11 Cybersecurity Security Mitigation and Response Plan

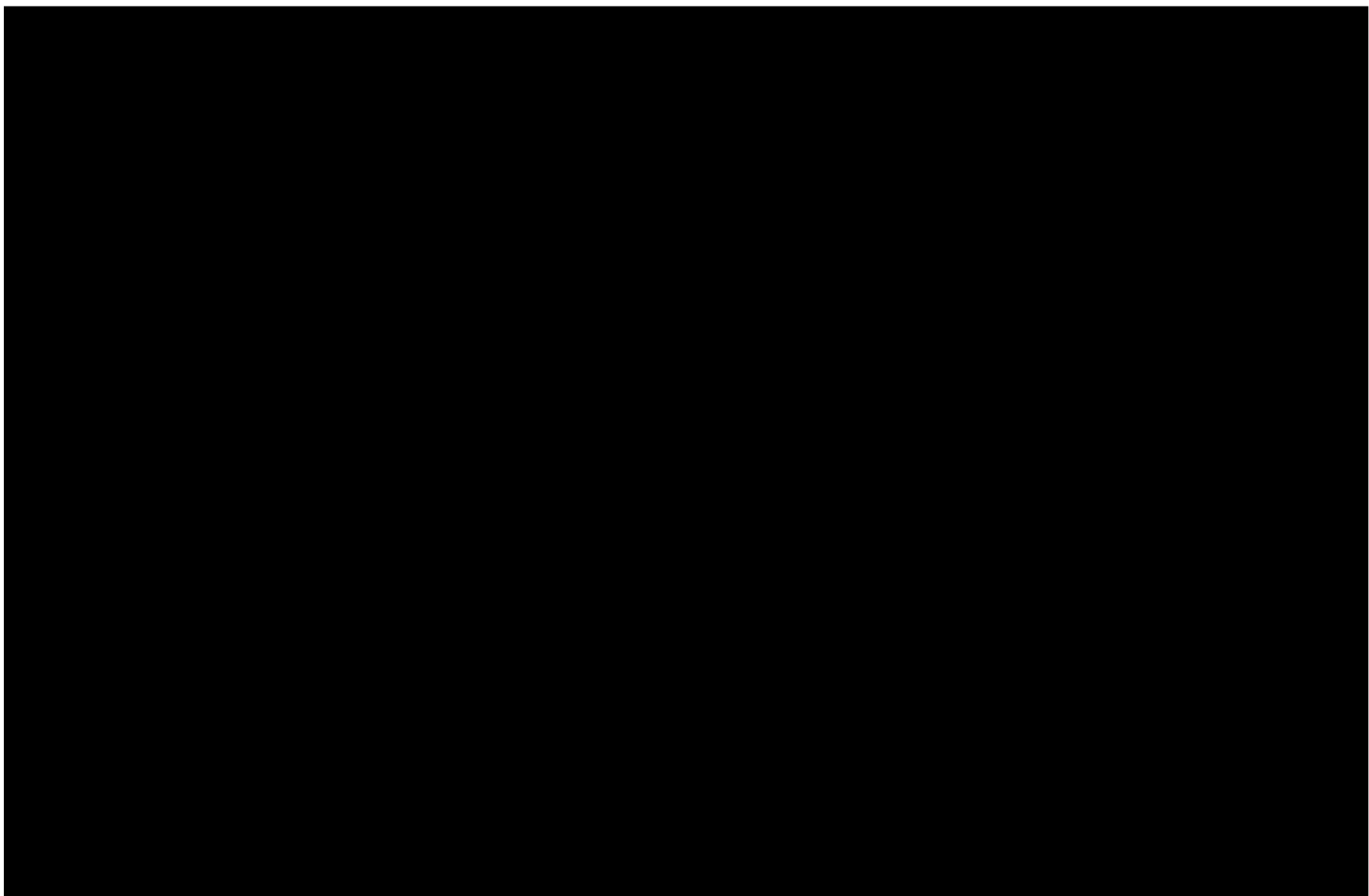
§25.53(e)(l)(F) - Cyber Security Annex

This Annex pertains to generation, transmission, and distribution operations. The BPUB maintains separate cyber security programs for Incident Response and Backup and Recovery programs. The Operational Technology (OT) systems and staff are different from the Information technology (IT) systems and staff. As required by NERC CIP regulatory compliance, operational assets that are critical to the reliability of electrical operations are segregated from BPUB's general business network into separate network environment(s), supported by separate governance, and are maintained by BPUB OT operational staff.

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13.12 Physical Security Mitigation and Response Plan

§25.53(e)(l)(G) - Physical Security Incident Annex

The BPUB maintains a comprehensive physical security program that addresses all BPUB facilities and assets including office buildings, service centers, vehicles, equipment, materials, supplies, sub-stations, generating facilities, transmission & distribution systems, as well as employees, contractors and visitors on BPUB property or while performing services on behalf of BPUB.

BPUB's physical security program applies to all BPUB employees, contractors, affiliates, and suppliers who are or become involved with any element related to physical security or operation.

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13.13 Preparedness Review

§25.53(f) - Drills

When required, BPUB intends to notify BPUB staff (using the method and form prescribed by the BPUB staff) and the appropriate Texas Department of Public Safety Emergency Management District Coordinators in BPUB's service area (in writing) of the date, time, and location when BPUB conducts an EOP drill. Notifications will be sent at least 30 days prior to the date of the drill. BPUB will conduct at least one drill each year to test its emergency procedures unless BPUB has activated its EOP in response to an actual event within the last 12 months.

13.14 Reporting Requirements

§25.53(g) - Reporting Requirements

When required, BPUB will provide reports during an activation of the State Operation Center (SOC) by the Texas Division of Emergency Management (TDEM) to the BPUB and its staff consistent with Section 25.53(g) and will provide voluntary reporting to the BPUB associated with significant outages as outlined in BPUB procedures. BPUB also recognizes additional NERC and ERCOT reporting that may be associated with major events.

13.15 Complete Copy of EOP-PUC Availability

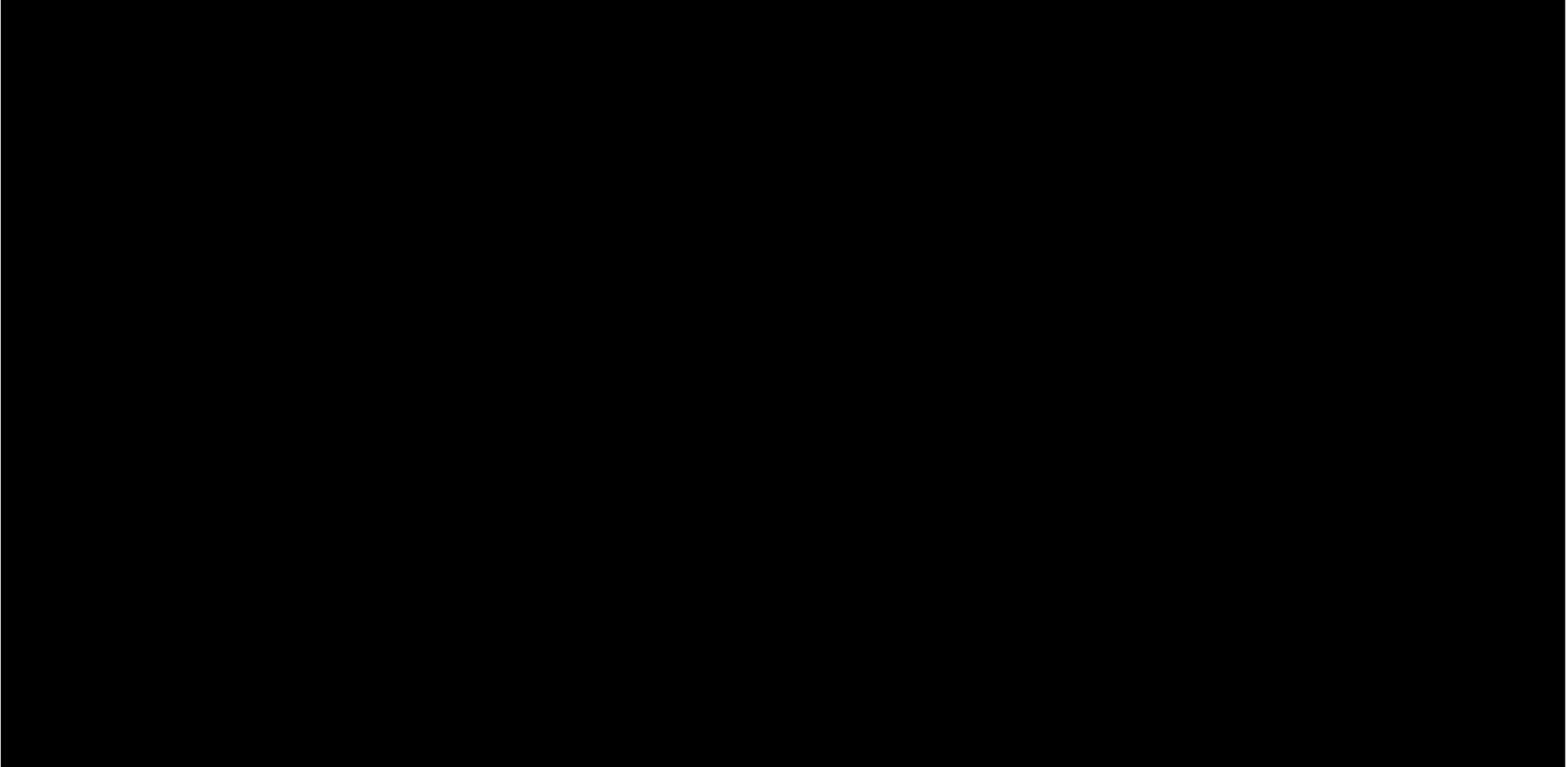
§25.53(c)(l)(B)- ERCOT; §25.53(c)(l)(D)- PUC

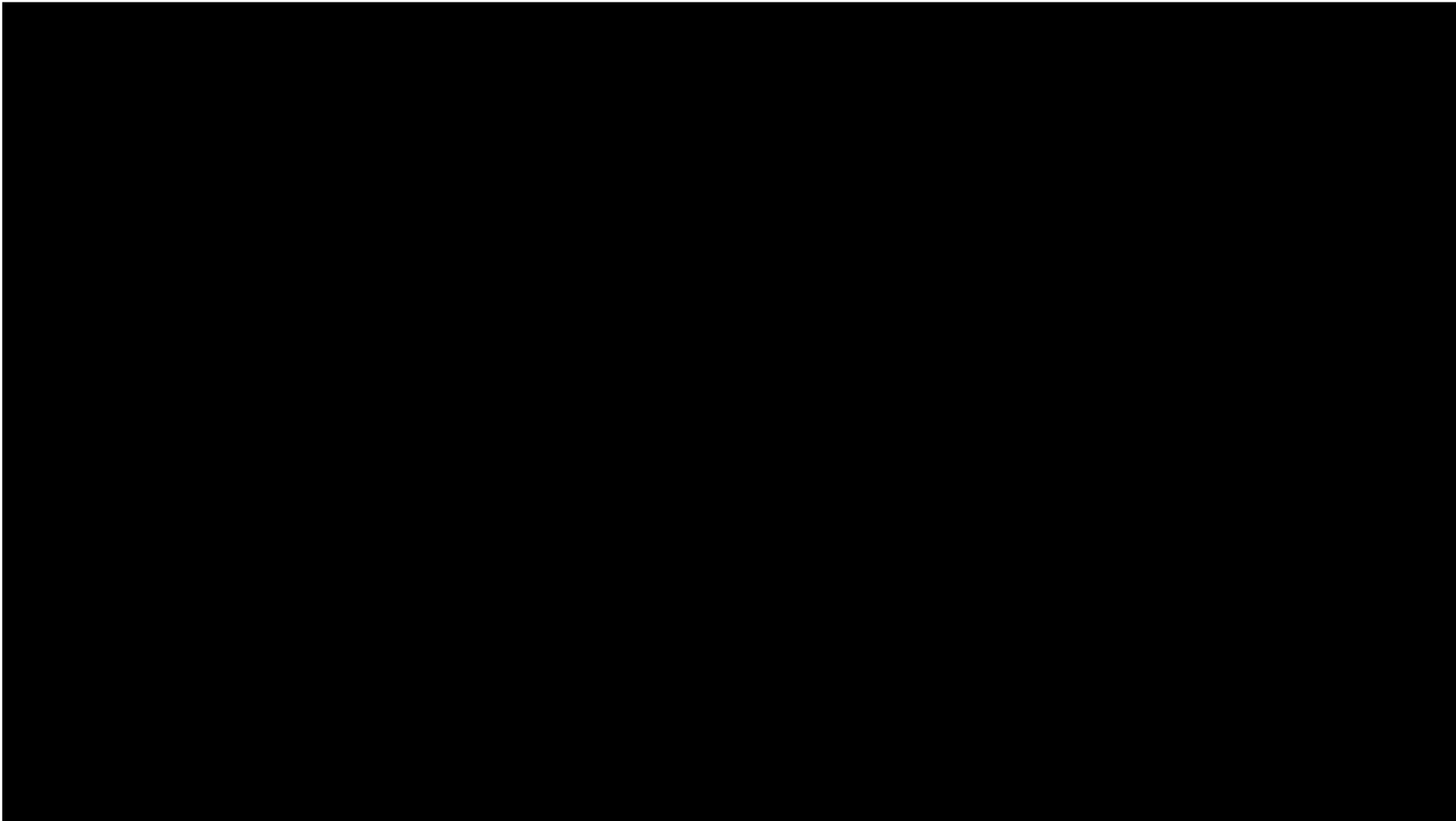
A complete unredacted copy of BPUB's EOP has been submitted or will be submitted to ERCOT. BPUB will have available in its entirety its EOP on request by the Commission at a location designated by BPUB.

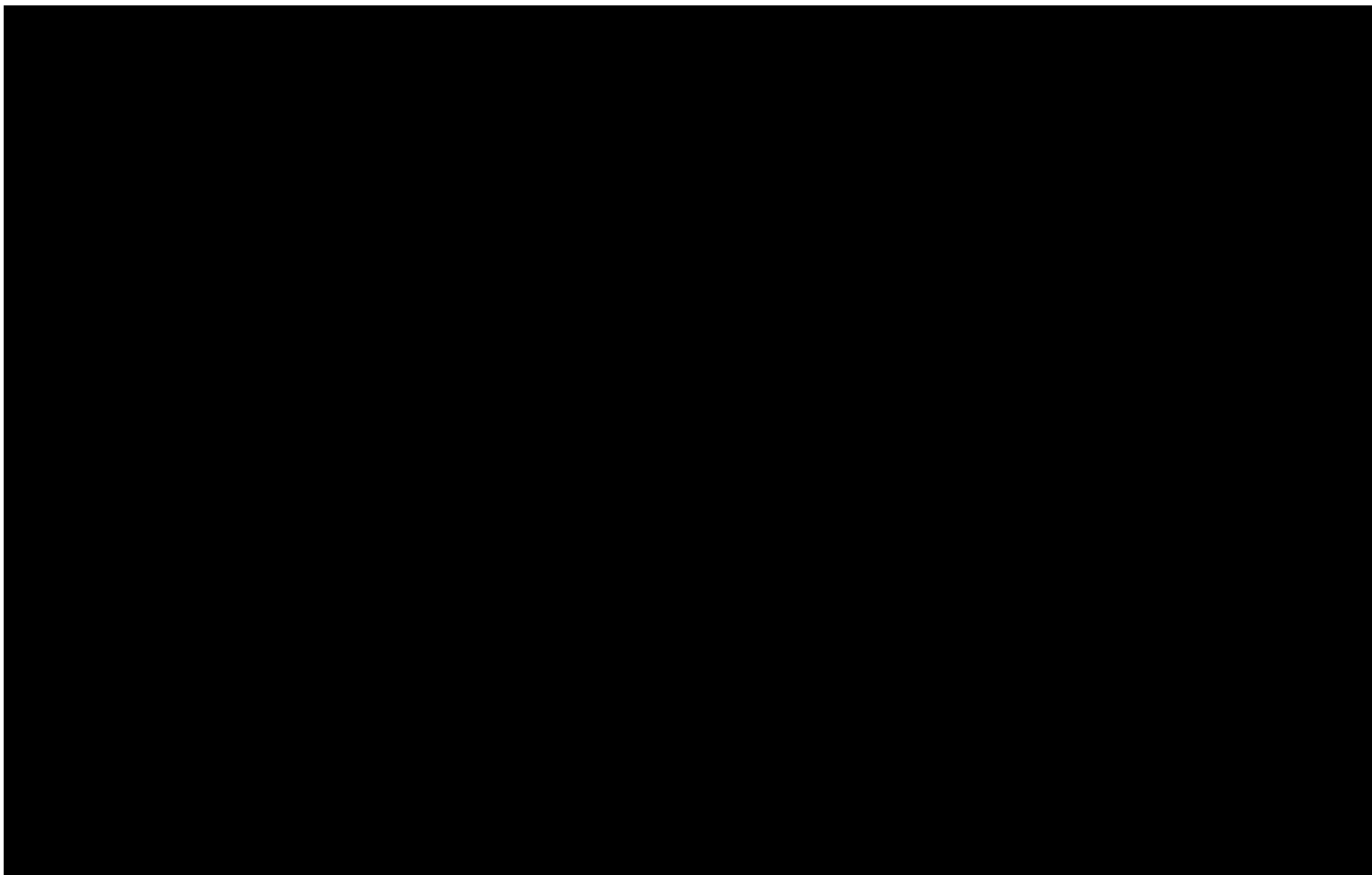
14. APPENDICES

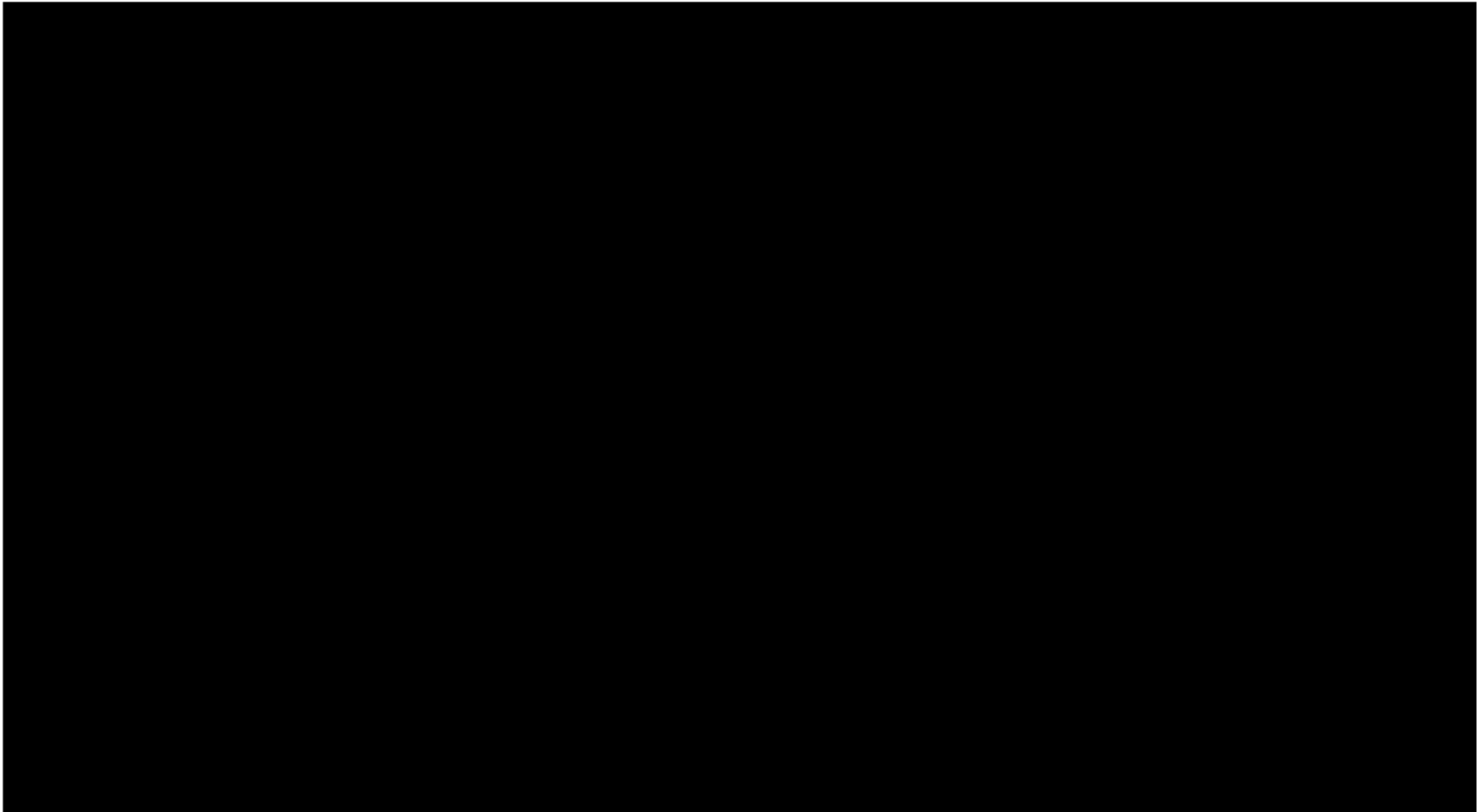
A.1 Communicating/Coordinating with other BPUB ESOs

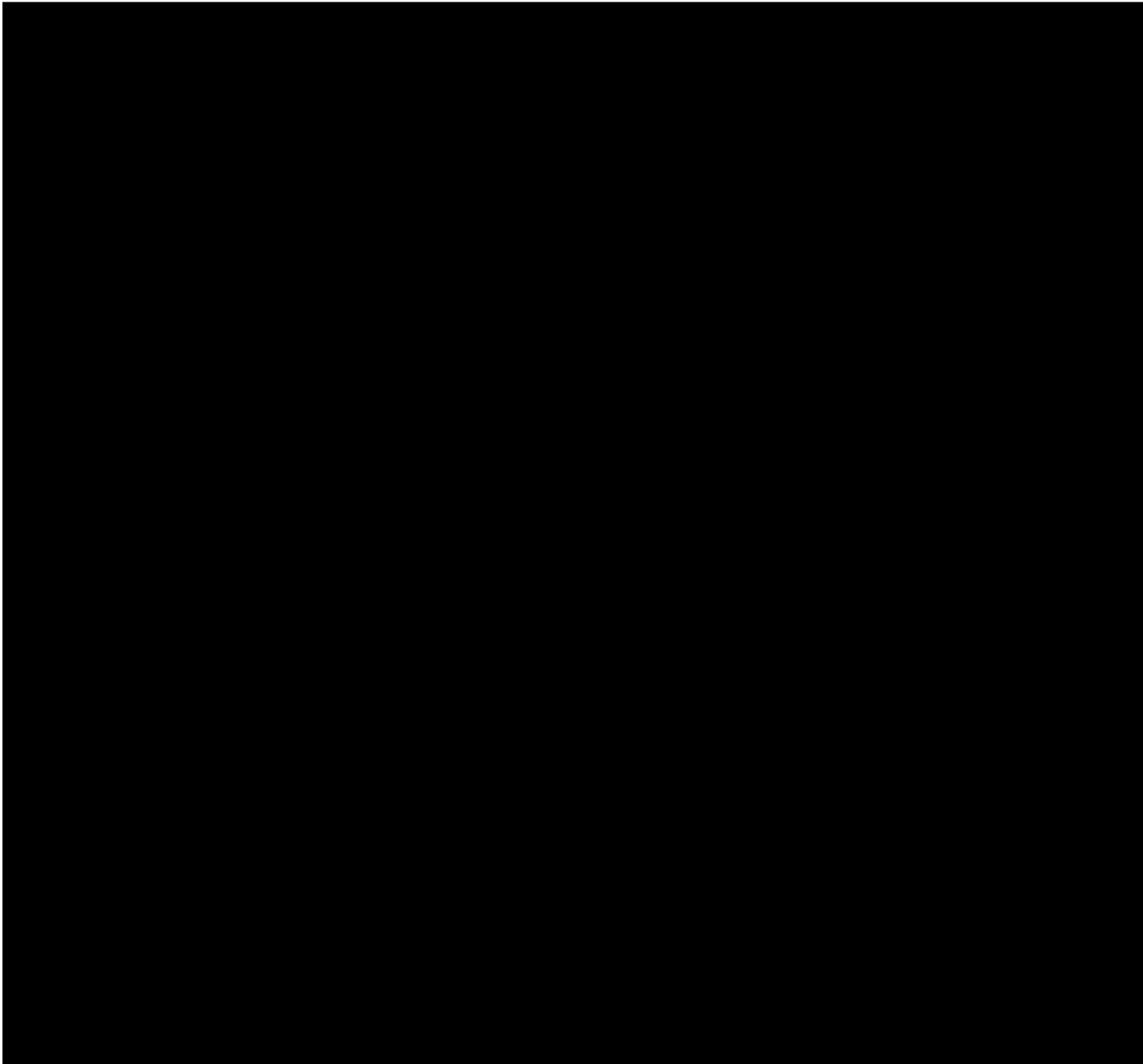
The following table contains specific contact information for the BPUB ESOs. During an anticipated weather emergency, the BPUB ESOs are put on alert/standby and advised that they may/will be called in to work as needed and vacations/requested time off, etc. may/will be cancelled. The BPUB ESOs are available on a 24-hour per day/7-day per week basis to assist in mitigating any emergency experienced on the BES system.

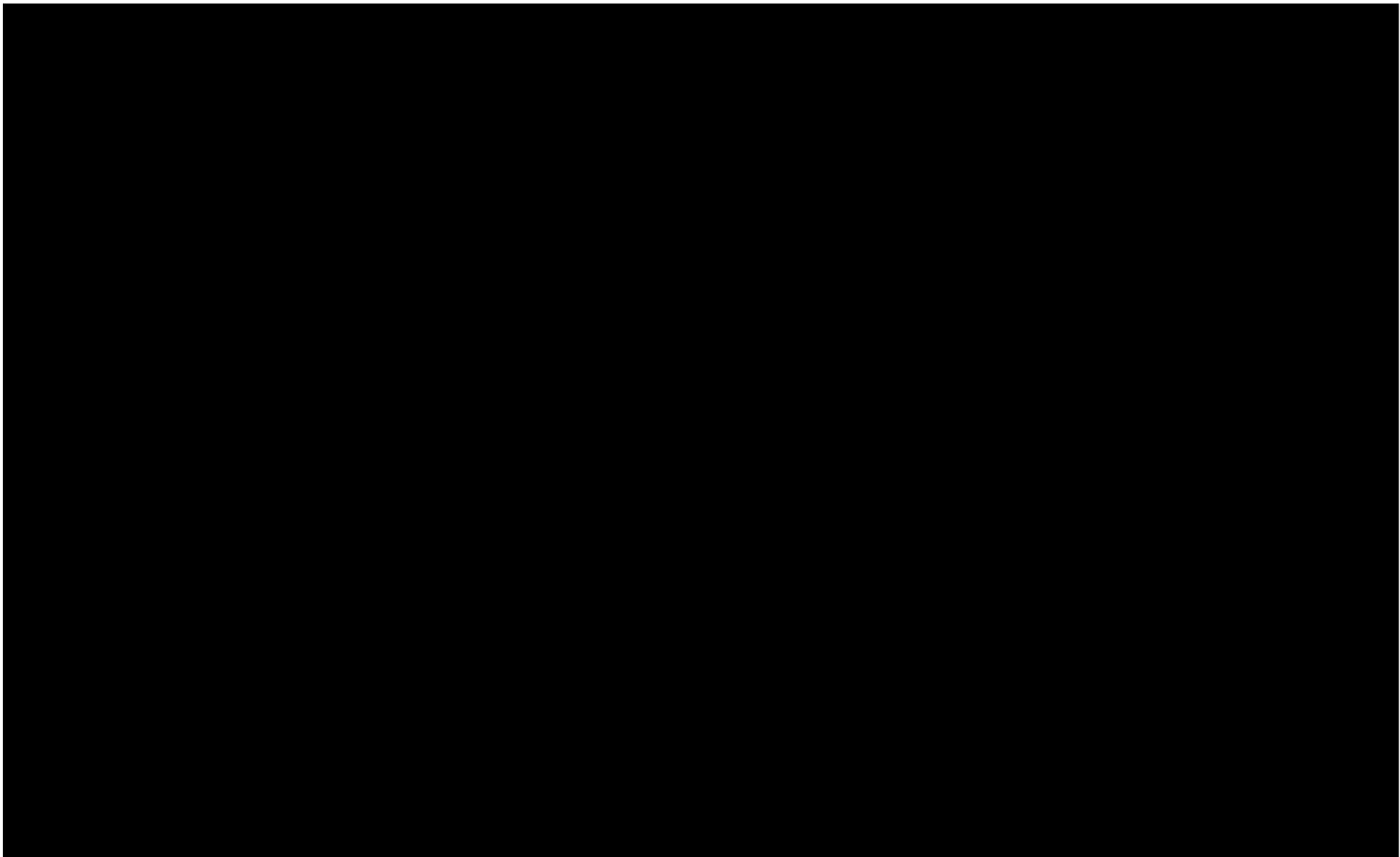




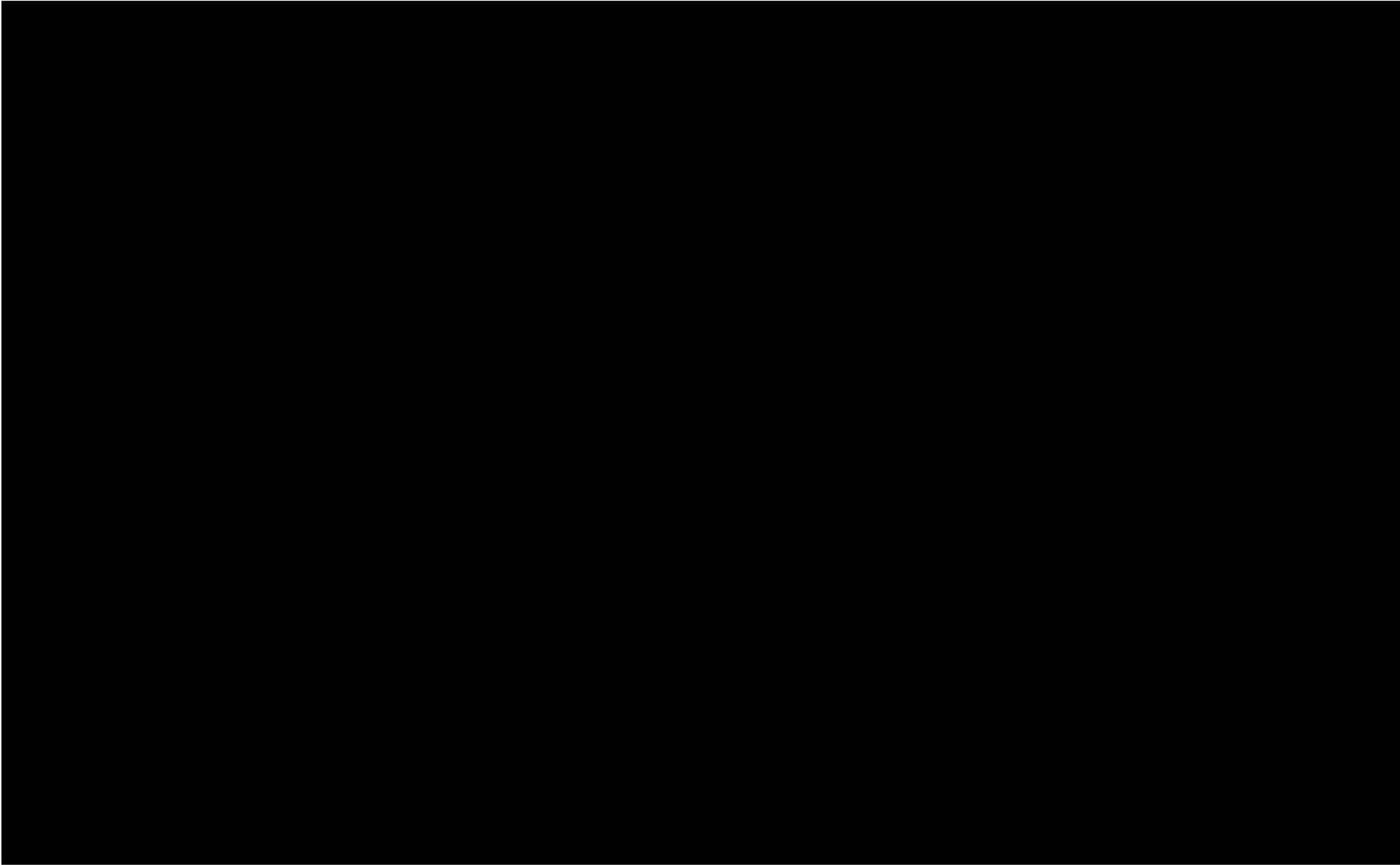


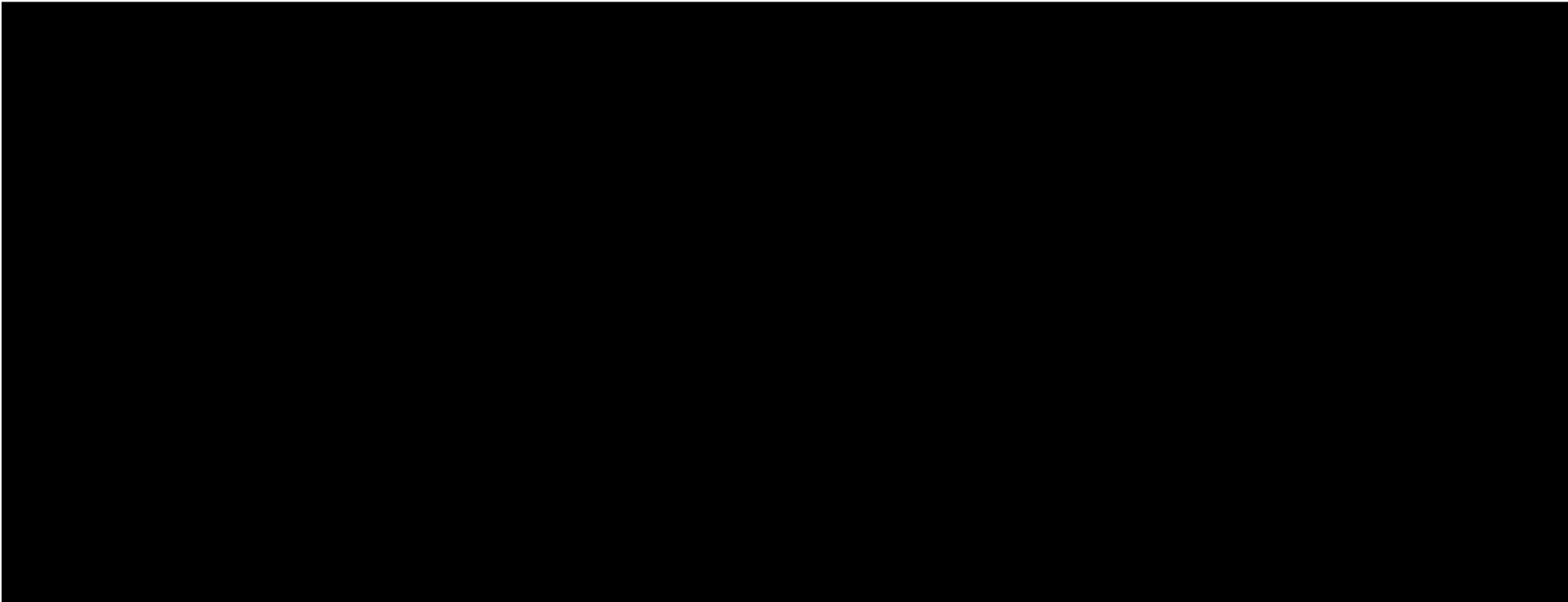




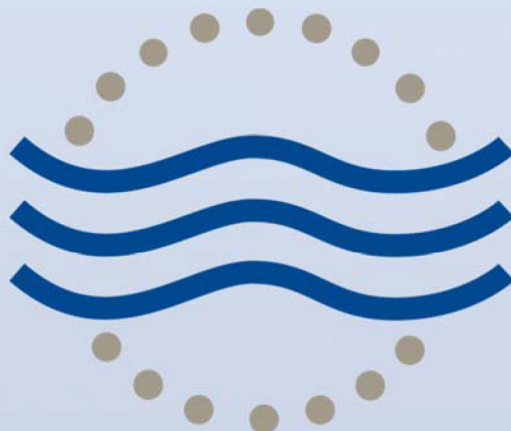








**BPUB EXECUTIVE SUMMARY
PUBLIC VERSION**



B R O W N S V I L L E
PUBLIC UTILITIES BOARD

EOP Executive Summary

May 27, 2022

P.O. Box 3270 Brownsville, TX 78523-3270

(956) 983-6100

Executive Summary

The Brownsville Public Utilities Board (BPUB) Emergency Operations Plan (EOP) was developed to comply with 16Tex. Admin. Code §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. 16 TAC §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri/ ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide the BPUB with a clear set of guidelines, policies, and procedures intended to guide preparations, responses, and actions related to all phases and types of electric system emergencies. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (16 TAC §25.53) and is intended to guide the organization in the preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

BPUB maintains the EOP in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- ▶ Provide the structure, policies, and procedures to guide the organization during all types of emergency conditions and situations.
- ▶ Enable BPUB, other utility and governmental entities, members, and stakeholders to coordinate and communicate effectively during emergency situations and events.
- ▶ Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing BPUB's human and physical resources and if necessary, by securing and utilizing outside resources.
- ▶ Ensure that BPUB maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes and includes Appendices that provide additional information related to the EOP.

- I. Change Record- Revision process in which each update or change to the plan should is tracked. The record of changes, in table format, contains, at a minimum, a change number, the date of the change, the name of the person who made the change, and a summary of the change. Other relevant information could be considered.
- II. Record of Distribution- The record of distribution, in table format, indicates the title and the name of the person receiving the plan, the agency to which the recipient belongs, the date of delivery, and the number of copies delivered. Other relevant information could be considered. The record of distribution can be used to prove that tasked individuals and organizations have acknowledged

their receipt, review, and/or acceptance of the plan. Redacted copies of the plan can be made available to the public and media without sensitive information.

- III. Message from General Manager (GM)- The message from the GM officially promulgates the EOP. It gives both the authority and the responsibility to staff to perform their tasks while affirming the GM's support for the EOP.
- IV. Safety & Inclement Weather Statement- This Statement confirms that BPUB has preparation plans for responding to a cold or hot weather emergency and associated checklists for transmission and distribution facility personnel to use during cold or hot weather emergency response. These checklists include lessons learned from past weather emergencies and drills to ensure necessary supplies and personnel are available through the weather emergency.
- V. BPUB Electrical System Information- This section describes the BPUB electrical system including descriptions of generating facilities and customers served.

(Section 1) Introduction

This section begins on page 8 of the EOP and corresponds to §25.53(d)(1)(A), §25.53(d)(1)(C), §25.53(d)(1)(D), and §25.53(d)(1)(E). It outlines BPUB's emergency management planning process and the BPUB's intent to respond to any emergency situation in a safe, effective and timely manner. It also describes the purpose of the EOP and why BPUB maintains the EOP in anticipation of natural disasters or situations involving curtailment or major interruptions in electrical service. Additionally, there is a statement on how the EOP aligns with ERCOT procedures and PUCT 25.53 rules.

(Section 2) Declaration of Emergency Event

This section begins on page 14 and details how the EOP provides structure, procedures, and tasks related to BPUB's response to various types of possible emergency events and incidents and gives the General Manager or the GM's Designee the responsibility and discretion to declare a situation, event, or incident as an "Emergency."

It also describes how BPUB will utilize an Incident Command System (ICS) structure to manage an emergency in coordination with oversight by BPUB management. This will ensure that there are clear roles and responsibilities for each event.

(Section 3) Maintenance and Implementation of EOP

This section begins on page 16 of the EOP and corresponds to §25.53(d)(1)(B). It describes how the EOP provides information on the EOP Committee which is comprised of various employees and members of management from across the BPUB is responsible for coordinating systematic updates of the EOP.

The section also details how the EOP will be reviewed and updated annually no later than March 15 to abide by the PUCT 25.53 rule.

Section 4-Drills and Exercises

This section is on page 18 and corresponds to §25.53(f). It describes how each year BPUB staff participate in exercises and drills in order to better prepare for an emergency or disaster event. Prior to hurricane season, BPUB ensures that they have the required internal materials on hand, as well as commitments for external resources which may be needed following a storm. Additionally, BPUB ensures that the proper critical facilities (i.e., hospitals, water and wastewater treatment plants, and fire stations) are identified.

Section 5-List Directory

This section is on page 19 and describes how lists and other readily accessible contact information are important during emergency events and situations. The BPUB EOP is designed to have all lists, contact information and other relevant reference information in the Appendix Section(s) of the EOP. The List Directory provides the name of the list (or document) along with the position / staff member in the organization that is responsible for keeping the list current, along with the timeframe for updating the lists, contact information and other relevant reference information.

Section 6-Mutual Aid/Mutual Assistance

This section begins on page 20 and describes BPUB's mutual aid and mutual aid assistance procedures, roles and responsibilities. BPUB maintains perennial contracts with Lower Colorado River Authority, Austin Energy, Denton Utilities, South Texas Electric Cooperative, and the American Public Power Association (APPA). Every year before Hurricane Season or an Emergency, the Staging Area Manager contacts the Mutual Aid participants to discuss the mutual aid agreement and make sure that they are available to assist if they are not affected by the same emergency.

Section 7-Employee Assignments

This section/table is on page 24 and purpose is to track upon designation of a declared emergency event, which employees should continue to report for duty at their regular locations and receive their EOP work assignments from their immediate supervisors.

Section 8-Emergency Operations Center

This section begins on page 26 and describes how the BPUB Emergency Operations Center (EOC) is the primary coordination body for all response and recovery efforts, and when activated, requires representation by all divisions. The EOC is organized along ICS best practices to develop and execute response and recovery objectives. Organized in this way, the EOC efficiently facilitates internal and external communication and collaborative decision making. The EOC creates response strategies, ensures continuity of the organization, and tracks data and results and disseminates information.

The section also includes a detailed BPUB ICS Structure chart.

Section 9- Communications Plan

This section begins on page 29 of the EOP and corresponds to §25.53(d)(2) (A-D). This section of the plan includes the strategies, key policies, roles, and communications steps that BPUB undertakes in an emergency event. Key policies include tracking and coordination of external communications, the designation of spokesperson(s) for BPUB, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses all the requirements in 16 TAC §25.53 regarding communications with the public, the media, customers, the PUC, local and State Governmental Entities, Officials, and Local/State Emergency Operations Centers, ERCOT, and Critical Load customers. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

Section 10-Pre-Arranged Supplies Plan

This section begins on page 34 of the EOP and corresponds to §25.53(d)(3). This section identifies the guidelines for the management of materials, supplies and resources that BPUB may need during emergency events. The plan provides details regarding the internal roles and responsibilities; use of outside suppliers; advance preparation; location of materials and supplies; and other logistical information.

Section 11-Emergency Staffing Plan

This section begins on page 35 of the EOP and corresponds to §25.53(d)(4). This section provides information and the roles and assignments for BPUB personnel during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that BPUB will utilize and addresses work schedule for BPUB personnel that BPUB shall use in significant and major system emergency events.

Section 12-Severe Weather Identification

This section begins on page 36 of the EOP and corresponds to §25.53(d)(5). BPUB has a series of policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This section also provides the policies and procedures related to communications under emergency conditions, activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels (Advisory, Watch, etc.) identified in the plan.

Section 13-EOP Annexes

13.1-Weather Emergency Plan Annex

This section begins on page 42 of the EOP and corresponds to §25.53(e)(1)(A).

13.2-Load Shedding Plan Annex

This section begins on page 46 of the EOP and corresponds to §25.53(e)(1)(B).

13.3-Water Shortage for Generation

This section begins on page 54 of the EOP and corresponds to §25.53(e)(2)(B).

13.4-Restoration Priorities and Procedures Annex

This annex is on page 37 of the EOP and corresponds to §25.53(e)(l)(B)(ii) and §25.53(e)(l)(B).

13.5-Critical Load Program and Medical Necessity Program Annex

This annex is on page 57 of the EOP and corresponds to §25.53(e)(l)(B)(iii).

13.6-Pandemic and Epidemic Plan and Procedures Annex

This annex begins on page 58 of the EOP and corresponds to §25.53(e)(l)(C).

13.7-Wildfire Mitigation Plan Annex

This annex begins on page 60 of the EOP and corresponds to §25.53(e)(l)(D).

13.8-Hurricane Preparedness and Response Plan Annex

This annex begins on page 62 of the EOP and corresponds to §25.53(e)(l)(E).

13.9-Cybersecurity Security Mitigation and Response Plan Annex

This annex begins on page 67 of the EOP and corresponds to §25.53(e)(l)(F).

13.10-Physical Security Mitigation and Response Plan Annex

This annex begins on page 70 of the EOP and corresponds to §25.53(e)(l)(G).

13.11-Preparedness Review

This annex is on page 74 of the EOP and corresponds to §25.53(f).

13.12-Reporting Requirements

This annex is on page 74 of the EOP and corresponds to §25.53(f).

13.13-Complete Copy of EOP-PUC Availability

This annex is on page 74 of the EOP and corresponds to §25.53(c) (1) (B)-ERCOT and §25.53(c)(1)(D)-PUC Availability.

Section 14-Appendices

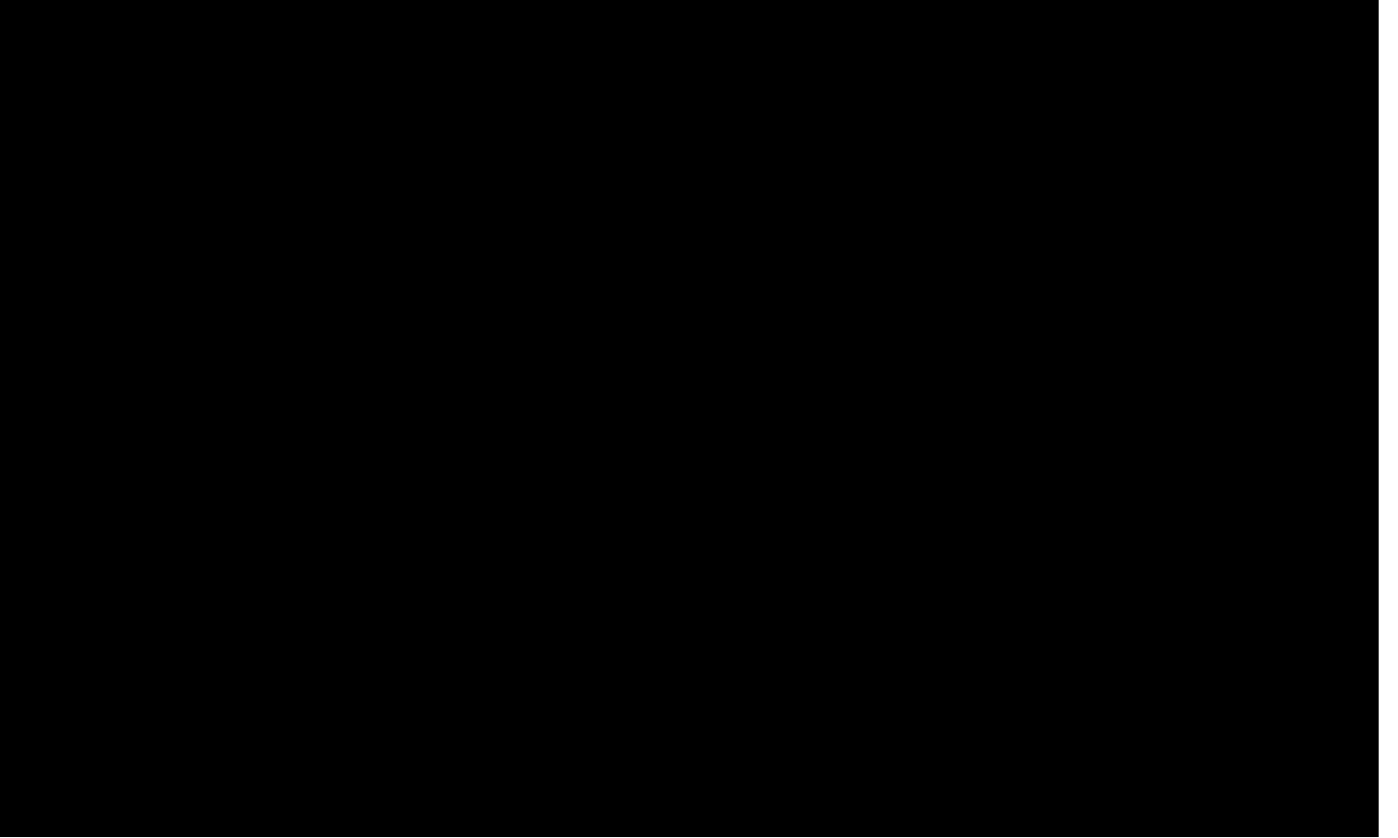
A.1 Communicating/Coordinating with Other BPUB ESOs

This appendix is on page 75.

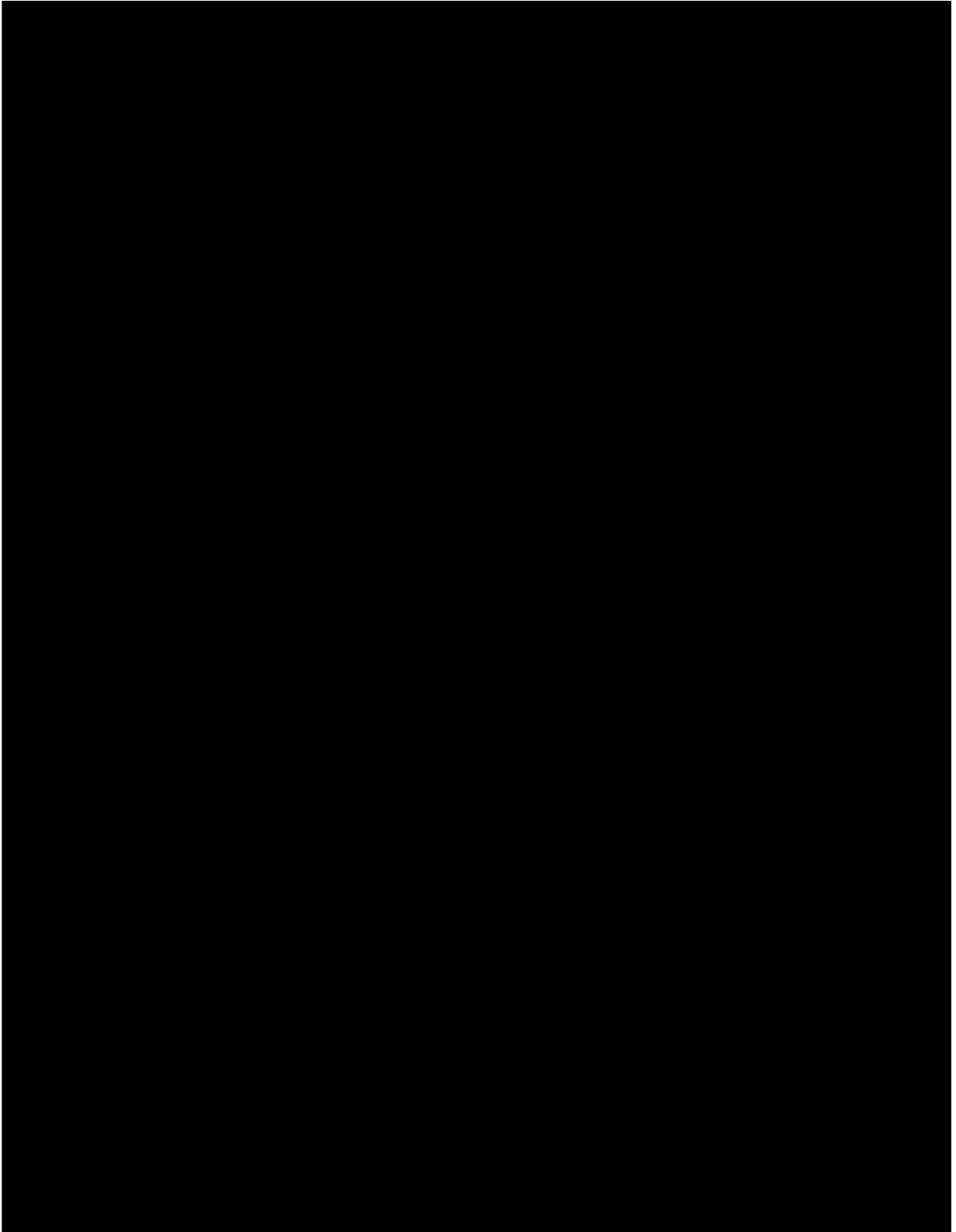
A.2 Emergency Contacts

This appendix is on page 75.

Plan Distribution and Training



Emergency Operations Plan Training



AFFIDAVIT OF BROWNSVILLE PUBLIC UTILITIES BOARD
Pursuant to 16 Tex. Admin. Code §§ 25.53(c)(4)(C) and (c)(1)(A)(i)(IV)

STATE OF TEXAS

§

COUNTY OF CAMERON

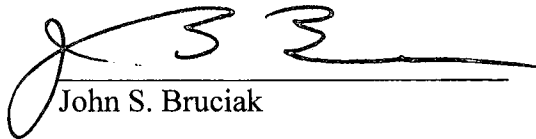
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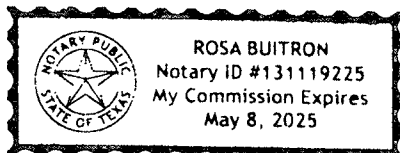
BEFORE ME, the undersigned authority, on this day personally appeared John S. Bruciak, who, having been placed under oath by me, did depose as follows:

1. My name is John S. Bruciak. I am the General Manager and Chief Executive Officer of Brownsville Public Utilities Board ("BPUB"). I am of legal age and a resident of the State of Texas.
2. BPUB's relevant operating personnel are familiar with and have received training on the applicable contents and execution of the BPUB Public Utility Commission of Texas Emergency Operations Plan ("BPUB PUC EOP"), and those personnel are instructed to follow the applicable portions of the BPUB PUC EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
3. The BPUB PUC EOP has been reviewed and approved by the appropriate BPUB executives.
4. Drills concerning the BPUB PUC EOP have been or will be conducted to the extent required by 16 Tex. Admin. Code § 25.53(f).
5. An appropriate summary of the BPUB PUC EOP has been distributed to local jurisdictions as needed.
6. BPUB maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
7. BPUB'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.

The foregoing Affidavit offered by me is true and correct.


John S. Bruciak

SUBSCRIBED AND SWORN TO BEFORE ME by the said John S. Bruciak this 31st day of May, 2022.





PUC Primary and Backup Emergency Contact List

