



Filing Receipt

Received - 2022-06-01 08:25:20 AM
Control Number - 53385
ItemNumber - 680



§25.53 EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

The City of Liberty (COL) Emergency Operations Plan (EOP) was developed to comply with 16 Tex. 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 COL with a clear set of guidelines, policies, and procedures 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 its preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

COL maintains the EOP in anticipation of a natural disaster and other situations 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 COL, other utility and governmental entities, customers, 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 COL's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that COL 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.

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 8 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes an introduction and purpose of the plan and a statement regarding the applicability of the EOP. And to emphasize the commitment of COL's senior leadership, this section includes a "Message from the City Manager" that underscores the importance of the plan and encourages all COL personnel to learn the plan and work with their respective supervisors and teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for COL and describes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 15 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan. This section includes the strategies, key policies, roles, and communications steps that COL will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for COL, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses the

requirements in 16 TAC §25.53 regarding communications with the public, the media, COL customers, the PUCT, OPUC, local and state governmental entities, officials, and (City/County) Emergency Operations Centers, 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-3) Pre-Identified Supplies for Emergency Response Plan:

This section begins on page 19 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides information on pre-Identified supplies for emergency Response and identifies the guidelines for the management of materials, supplies and resources that COL 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-4) Staffing During Emergency Response Plan:

This section begins on page 20 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP provides information regarding staffing During Emergency response and the roles and assignments for COL personnel before and during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that COL will utilize and addresses potential work schedules for COL personnel in significant and major system emergency events.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure:

This section begins on page 22 of the EOP and corresponds to §25.53(d)(5).

COL has policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This final section also provides the policies and procedures related to the activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels identified in the plan.

EOP Annexes

Weather Emergency Annex:

This section begins on page 27 of the EOP and corresponds to §25.53(e)(1)(A).

The Weather Emergency Annex addresses preparation for both hot and cold weather emergencies. The key policies in this section set forth the requirement for COL to develop and utilize a checklist for use in extreme weather situations to ensure that field personnel that are called upon to respond in emergency situations will have written guidance to organize their efforts.

Load Shed Annex:

This section begins on page 31 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding COL preparations and actions for MISO Market Capacity Emergency levels and include details for load shed events. The load shed plan contains the policies and procedures in place between COL, Sam Rayburn Municipal Power Agency (SRMPA is the entity that owns the substations that serve COL), and Entergy LBA which is the Designated Transmission Operator (DTO) for COL, regarding the planning and preparation for load shed events and contains other operational information for Market Capacity Emergency events.

This Annex also contains information on COL procedure for coordination of system restoration with SRMPA and Entergy following a load shed event, and key policies and procedures that COL utilizes for restoration

from significant system outage events. The final subsection of this Annex provides information on COL's Critical Load Registry and information related to the maintenance of the registry, communication procedures with these customers, and other relevant information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 37 of the EOP and corresponds to §25.53(e)(1)(C).

In the Pandemic and Epidemic Annex, COL has provided policies, procedures, and guidelines that are designed to prepare for pandemic and epidemic outbreaks, and to effectively deal with ongoing operations, restoration and communications issues presented by an epidemic or pandemic event. Key policies in this section address the steps COL takes regarding prevention and preparation, employee safety, working remotely, and steps COL takes to ensure adherence to policies implemented by state and local agencies.

Wildfire Annex:

This section begins on page 40 of the EOP and corresponds to §25.53(e)(1)(D).

The Wildfire Annex provides the guidelines, procedures and best practices related to wildfire mitigation and document COL's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery. This section includes wildfire mitigation actions along with steps COL would take to respond to a wildfire event.

Hurricane Annex:

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

COL's service area is located in a Hurricane Evacuation Zone (HEZ), and therefore this annex is applicable to COL's EOP. The information in this annex addresses the steps and actions COL will take to monitor, prepare, and respond to tropical storms and hurricanes that impact the COL service area. These events may cover multiple days and various emergency levels based on the projected path of the storm and the actual landfall and characteristics of a given storm event.

Cyber Security Annex:

This section begins on page 43 of the EOP and corresponds to §25.53(e)(1)(F).

The Cyber Security Annex provides the guidelines, procedures and best practices related to cyber security for COL owned IT systems, the electric distribution system, and SRMPA substations. Based on COL's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security and employee education.

Physical Security Incident Annex:

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

The Physical Security Annex provides information regarding the policies and procedures COL has implemented to protect COL-owned distribution facilities, office complexes and other facilities that are critical to the operation of the COL electric distribution system. Based on COL's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for COL's facilities, visitors, and surveillance.

Plan Distribution and Training

The table below documents the distribution list of the EOP and the associated training document to COL personnel including the date the training was completed by each employee:

COL Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Tom Warner	City Manager	May 31, 2022	May 31, 2022
Damon Jones	Public Works Director	May 31, 2022	May 31, 2022
Naomi Herrington	Asst. City Manager/CFO	May 31, 2022	May 31, 2022
Brian Hurst	Fire Chief	May 31, 2022	May 31, 2022

PROJECT NO. 53385

**AFFIDAVIT OF CITY MANAGER OF
CITY OF LIBERTY**

PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF LIBERTY §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath he or she is entitled to make this Affidavit, and that the statements contained below are true and correct.

I, Tom Warner, am of sound mind, capable of making this affidavit, and personally equipped with the facts stated herein. As the highest-ranking representative with binding authority over a Municipally Owned Utility operating in the State of Texas, I swear or affirm the following facts are true and correct:

1. I am the City Manager for the City of Liberty (COL), which is an incorporated home-rule municipality in the State of Texas.
2. COL operates an electric distribution utility system in the State of Texas.
3. The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plans Rule, has been distributed to COL Managers and Operations personnel.
4. COL executives and Operations personnel are familiar with and have received training on the applicable contents and execution of the updated 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.
5. The EOP has been reviewed and approved by the appropriate executives.
6. In accordance with the updated 16 TAC §25.53(f), a drill (tabletop exercise) for COL Operations personnel is scheduled for a date and time in CY2022 before September 30, 2022.
7. COL will notify Commission Emergency Management Personnel and regional TDEM representative(s) at least thirty (30) days prior to the drill.
8. COL has distributed the EOP to local Jurisdictions, including regional TDEM personnel and The Liberty County Emergency Management Coordinator.
9. COL has a Business Continuity Plan related to returning to normal operations after an emergency event or situation.
10. COL'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.

Tom Warner

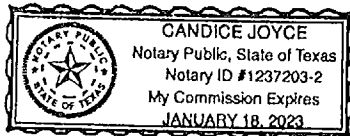
Tom Warner, City Manager
City of Liberty

Sworn and subscribed before me on this 24th day of May, 2022, to certify which witness my hand and official seal.

Candice Joyce

Notary Public in and for the State of Texas

Liberty
County



PUC Primary and Backup Emergency Contact List

Primary Emergency Contact:	Tom Warner
Title:	City Manager
Email:	twarner@cityofliberty.org
Main Phone:	936-336-3684
Cell Phone:	936-346-7607

Secondary Backup Emergency Contact:	Damon Jones
Title:	Public Works Director
Email:	djones@cityofliberty.org
Main Phone:	936-336-3684
Cell Phone:	406-659-9582