



## Filing Receipt

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# **§25.53 EMERGENCY OPERATIONS PLAN**

## **EXECUTIVE SUMMARY**

## **Executive Summary**

The City of Sanger (COS) 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 COS 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.

COS 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 COS, 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 COS's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that COS 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 COS's senior leadership, this section includes a "Message from the City Administrator" that underscores the importance of the plan and encourages all COS personnel to learn the plan and work with their respective supervisors and management teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for COS 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 COS will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for COS, 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, COS customers, the PUCT, OPUC, local and state governmental entities, officials, and (City/County) 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-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 COS 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 COS 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 COS will utilize and addresses potential work schedules for COS 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).**

COS 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 26 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 COS 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 30 of the EOP and corresponds to §25.53(e)(1)(B).**

The Load Shed Annex contains information regarding COS preparations and actions for ERCOT Emergency Event Alert (EEA) levels and includes details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures COS would utilize with a Designated ERCOT Transmission Operator (DTO) for COS, regarding the planning and preparation for load shed events and contains detailed information regarding other operational information for EEA events.

This Annex also contains information on COS procedures for coordination of system restoration COS will utilize following a load shed event, and key policies and procedures that COS utilizes for restoration from significant system outage events. The final subsection of this Annex provides information on COS'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 35 of the EOP and corresponds to §25.53(e)(1)(C).**

In the Pandemic and Epidemic Annex, COS 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 COS takes regarding prevention and preparation, employee safety, working remotely, and steps COS takes to ensure adherence to policies implemented by state and local agencies.

#### **Wildfire Annex:**

**This section begins on page 38 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 documents COS'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 COS would take to respond to a wildfire event.

#### **Hurricane Annex:**

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

COS's service area is not located in a Hurricane Evacuation Zone (HEZ), and therefore COS's EOP does not include this annex.

#### **Cyber Security Annex:**

**This section begins on page 41 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 the COS owned substation facilities, office facilities and electric distribution system. Based on COS'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 43 of the EOP and corresponds to §25.53(e)(1)(G).**

The Physical Security Annex provides information regarding the policies and procedures COS has implemented to protect COS substations and distribution facilities, office complexes and other facilities that are critical to the operation of the COS electric distribution system. Based on COS's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for COS'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 COS personnel including the date the training was completed by each employee:

COS Personnel		EOP Distribution Date	EOP Training Completed Date
Name / Title			
John Noblitt	City Manager	5/23/22	5/23/22
Alina Ciocan	Assistant City Manager	5/23/22	5/23/22
Clayton Gray	Finance Director	5/23/22	5/23/22
Jeriana Staton	Director of HR and Special Projects	5/23/22	5/23/22
Michael Prater	Director of Electric Utility Dpt.	5/23/22	5/23/22
Ronnie Grace	Electric Foreman	5/23/22	5/23/22
Mark Griffith	Electric Crew Lead	5/23/22	5/23/22
Zachary Clayton	Lineman Class A	5/23/22	5/23/22
Joshua Green	Lineman Class A	5/23/22	5/23/22
Brandon Metcalf	Electric Groundman	5/23/22	5/23/22
Andrew Neighbors	Lineman Class A	5/23/22	5/23/22
Ranell Wolf	Administrative Assistant III	5/23/22	5/23/22

**PROJECT NO. 53385**

**AFFIDAVIT OF CITY MANAGER OF  
CITY OF SANGER**

**PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53**

**STATE OF TEXAS §**

**COUNTY OF DENTON §**

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, John Noblitt, swear or affirm that as a Municipally Owned Utility operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region and control system, confirms the following:

"I am the City Manager for the City of Sanger (COS), which is an incorporated municipality in the State of Texas.

COS operates an electric distribution utility system in the State of Texas and the Electric Reliability Council of Texas power region.

The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, has been distributed to COS Managers and Operations personnel;

COS executives and Operations personnel have received training on the updated EOP;

In accordance with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for COS Operations personnel is scheduled for a date and time in CY2022 before September 30, 2022;

COS will notify Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

COS has distributed the EOP to local Jurisdictions, including regional TDEM personnel and including the Denton County Emergency Management Coordinator;

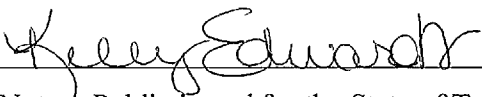
COS has a Business Continuity Plan related to returning to normal operations after an emergency event or situation;

COS'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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John Noblitt, City Manager

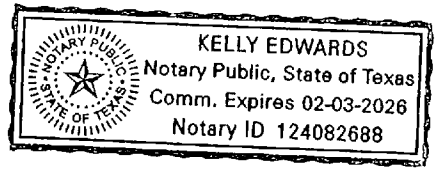
City of Sanger

Sworn and subscribed before me on this 23 day of May, 2022.

  
\_\_\_\_\_  
Notary Public in and for the State of Texas

\_\_\_\_\_  
Notary Seal

(Must be notarized by a notary public in and for the State of Texas)





## **PUC Primary and Backup Emergency Contact List**

### **Address Information**

#### **Contact**

#### **Secondary Emergency**

**Company:**SANGER ELECTRIC SYSTEM

**Contact:**MIKE PRATER

**Title:**DIRECTOR OF ELECTRIC UTILITIES

**Main:**(940) 458-2064

**Toll-Free:**

**Fax:**(940) 458-2908

**Home:**

**Cell:**(940) 391-9423

**Email:**mprater@sangertexas.org

#### **Contact**

#### **Primary Emergency**

**Company:**SANGER ELECTRIC SYSTEM

**Contact:**JOHN NOBLITT

**Title:**CITY MANAGER

**Main:**(940) 458-7930

**Toll-Free:**

**Fax:**(940) 458-4180

**Home:**

**Cell:**(940) 222-9970

**Email:**jnoblitt@sangertexas.org

#### **Contact**

#### **Tertiary Emergency**

**Company:**SANGER ELECTRIC SYSTEM

**Contact:**ALINA CIOCAN

**Title:**ASSISTANT CITY MANAGER

**Main:**(940) 458-7930

**Toll-Free:**

**Fax:**

**Home:**

**Cell:**(214) 733-7932

**Email:**asciocan@sangertexas.org