



Filing Receipt

Received - 2022-04-14 02:41:03 PM
Control Number - 53385
ItemNumber - 70

PROJECT NO. 53385

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

**JOINT EMERGENCY OPERATIONS PLAN
FOR NRG ENERGY, INC. POWER GENERATION COMPANIES**

EXECUTIVE SUMMARY

Contents and Policies

This Joint Emergency Operations Plan (Joint EOP) is submitted by, and is applicable to, the NRG Energy, Inc. (NRG) owned Power Generation Companies listed below and, collectively, they are referred to herein as NRG PGCs. The redacted Joint EOP is being submitted for compliance with 16 Tex. Admin. Code §25.53 for the following Power Generation Companies:

• Gregory Power Partners LLC (Certificate No. 20010)
• NRG Cedar Bayou Development Company, LLC (Certificate No. 20237)
• NRG Cottonwood Tenant LLC (Certificate No. 20537)
• NRG Texas Power LLC (Certificate No. 20184)
• Petra Nova Power I LLC (Certificate No. 20302)

A separate Electric Service Emergency Operations Plan (ESEOP) is being submitted on behalf of the NRG owned Power Generation Company NRG South Texas LP (Certificate No. 20147).

The purpose of the Joint EOP is to provide guidance to be followed by NRG PGCs in response to any potential or actual business disruption impact, or with the potential to impact, NRG's PGCs and to provide the framework for the continuation of operations.

NRG PGCs' corporate parent, NRG, takes an all-weather hazards approach to emergency and crisis management. NRG has in place numerous Business Continuity Plans and an all-hazard Corporate Crisis Management Plan.

NRG PGCs have extensive experience in preparing for and handling emergencies, and the contents of the plans used for emergencies are tried and true. NRG employs skilled personnel who help ensure that all entities have the appropriate teams, documentation, and action plans to handle emergencies. Due to the location of certain plants in and around the Houston and surrounding

counties, NRG's corporate emergency plans as well as NRG PGC's plant-wide and site-specific emergency preparedness plans, have been executed and have proven to be effective for hurricanes, along with other emergencies.

The Joint EOP meets the requirements of the rule with a compilation of relevant documents. In addition to corporate emergency procedures, the NRG PGCs have implemented all-site as well as site-specific procedures that provide guidelines for the actions necessary in the event of an emergency situation.

Summary of Joint EOP

The Joint EOP submitted on behalf of the NRG PGCs is comprised of communication, emergency and crisis management plans to address pre, mid, and post event efforts related to actual or potential crises and emergencies, including hazards and threats as well as additions to address the new requirements set forth by 16 Tex. Admin. Code § 25.53 effective March 20, 2022. The procedures outlined in the plans provide guidelines for actions necessary in the event of an emergency situation such as severe hot or cold weather, hurricane, water shortage or drought, pandemic/epidemic, cyber and physical security, and tornado. It is the responsibility of all personnel to ensure that the procedures outlined in plans that comprise the Joint EOP are maintained and carried out properly. As a whole, these plans are the Joint EOP and any activation of one is an activation of the Joint EOP. Unless otherwise indicated, the documents contained in the Joint EOP apply to all the NRG PGCs.

The following information provides high-level information on how the Joint EOP addresses rule requirements, followed by an index of where to find documentation applicable to each requirement. The compilation of emergency operations plans incorporated within the Joint EOP are summarized below and, as a whole, they comprise the Joint EOP and include the following:

Communications Plan: The *Emergency Notifications Plan* of the Joint EOP outlines a plan for communicating and reporting of emergency events to the appropriate levels of NRG Management and, when applicable, for communicating and reporting of emergency events to the public, external media, the Commission, OPUC, fuel suppliers, local and state governmental entities, officials, emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator, as appropriate, to ensure necessary outreach and availability for contact occur as appropriate at each level of an event.

Supplies Plan: The compilation of emergency operations plans that comprise the Joint EOP set forth, separately and individually, guidelines and guidance for ensuring that adequate inventories of all commodities, equipment, and other necessary supplies are available during an emergency event.

Staffing Plan: The compilation of emergency operations plans that comprise the Joint EOP include, separately and individually, guidelines and procedures for staffing during emergency events to ensure business and plant operations can continue during events, including any necessary relocations.

Weather-Related Hazards Identification and Activation Plan: The compilation of emergency operations plans that comprise the Joint EOP outline the processes for identification of an emergency situation and the actions required to ensure reliable operation through the emergency event. The Joint EOP also contains a process for activation of a plan, as necessary, based on the identification efforts.

Annexes: As noted above, NRG takes an all-hazards approach to emergency and crisis management. As required by 16 TAC § 25.53(e)(2) various detailed plans specific to certain events for PGCs are addressed including extreme cold and hot weather, water shortages, restoration of services, pandemics and epidemics, hurricanes, cyber security and physical security, and tornados.

Cold Weather Emergency Annex: The Joint EOP's sets forth, in the *South Region Winter Readiness Procedure*, an operational plan for responding to a cold weather emergency. Winter readiness refers to the preparation required to ensure reliable operation during winter weather emergencies, defined to be from November 1 through March 31, and applies to all NRG generating plants operating in the South Region. This procedure is used in conjunction with additional site-specific winter readiness procedures.

Hot Weather Emergency Annex: The Joint EOP includes a *South Region Operations Summer Readiness* plan that is an operational plan for responding to a hot weather emergency. Summer readiness refers to the preparation required to ensure reliable operations during extreme summer weather conditions, defined as being the period from May 1 through September 30, and applies to all NRG generating plants operating in the South Region. This procedure is used in conjunction with additional site-specific winter readiness procedures.

Water Shortage/ Drought Annex: The Joint EOP contains a *Drought Contingency Plan / Water Conservation EOP* that addresses supply shortages of water. The purpose of this water shortage / drought plan is to explain procedures for enduring a longstanding drought, and actions that must be taken to allow for maximum uses of resources available during such a time.

Restoration of Service Annexes: The Joint EOP includes individual restoration plans for generation facilities that identify steps intended to restore to service a generation resource that failed to start, that tripped offline due to a hazard or threat, or that was forced offline due to an emergency event.

Pandemic and Epidemic Annex: The Joint EOP contains an *Infectious Disease and Pandemic Response Plan* that minimizes employee exposure, maintains essential plant operations in the event of a pandemic/ epidemic and applies to all NRG personnel at NRG owned and/or operated generation facilities. This procedure may be used in conjunction with site-specific pandemic/epidemic procedures.

Hurricane Annex: The Joint EOP contains the *Gulf Coast Regional Operational Hurricane Readiness* that is a readiness plan that refers to the preparation required to ensure reliable plant operation during hurricane emergencies, defined to be from June 1 through November 30, and applies to all NRG generating plants in the South Region. This procedure is used in conjunction with additional site-specific hurricane readiness procedures.

Cyber Security and Physical Security Incidents Annex: The Joint EOP includes a *Corporate Crisis Management Plan* that provides guidance in response to any business disruption impacting, or with the potential to impact, NRG's employees, customers, suppliers, shareholders, reputation, assets, or the environment, including, but not limited to, cyber security and physical security incidents. NRG employee training and internal communications inform all employees how to identify suspicious activity such as phishing and report it to the appropriate personnel. Annual cyber security training is required of employees.

Tornado Annex: The Joint EOP contains a *Tornado Emergency Operating Procedure* that provides a general outline of identification and actions which are followed when tornado activity, or threat of activity, is expected to affect any NRG owned generation facility in the South Region. This procedure may be used in conjunction with additional site-specific tornado readiness procedures.

In addition to the above-named regional, all-site plans, each of NRG PGCs named herein has in place multiple, additional, site-specific Emergency Operations Plans that address emergency procedures and business continuity specific to the PGC's location, type of generation and any supplier fuel utilized so that, should normal operations be disrupted by an emergency such as a natural or man-made disaster, a pandemic, or a State Operations Center (SOC) declared event, including a hurricane, each of the NRG PGCs named herein will be prepared in accordance with the PUCT rule requirements.

Indexed Reference to Joint EOP Sections That Correspond to Rule Requirements

Reference is made on the attached Exhibit A to specific sections and page numbers of the Joint EOP that correspond with the requirements of Rule § 25.53 for Power Generation Companies.

Record of Distribution – Access to and Training on Joint EOP

Outlined on the attached Exhibit B is a record (in table format) containing the titles and names of persons who have received access to and training on the Joint EOP, as well as the dates of access to the relevant portions of the Joint EOP.

List of Primary/Backup Emergency Contacts

Outlined below is a list (in table format) of primary and, when possible, backup emergency contacts for the NRG PGCs, including identification of the specific individual(s) who can immediately address urgent requests and questions from the Commission during an emergency.

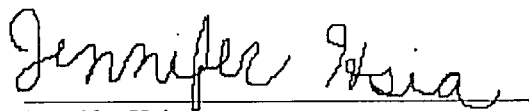
Name	Title	Telephone	Email	Contact Type
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Affidavits

Attached as Exhibit C to this Executive Summary is the Affidavit of Dudley D. Zahn, the highest-ranking representative, official or officer with binding authority over the following NRG PGCs: Gregory Power Partners, LLC, NRG Cedar Bayou Development Company, LLC, NRG Cottonwood Tenant LLC, and NRG Texas Power LLC.

Attached as Exhibit D to this Executive Summary is the Affidavit of Greg Kennedy, the highest-ranking representative, official or officer with binding authority over the NRG PGC Petra Nova Power I LLC.

Respectfully submitted,



Jennifer Hsia
Managing Senior Counsel
NRG Energy, Inc.
910 Louisiana St.
Houston, TX 77002
(713) 537-3292
jennifer.hsia@nrg.com

EXHIBIT A

Indexed References

16 TAC § 25.53 (c)(1)(A)(i)(II) – Reference to specific sections and page number of the Joint EOP that correspond with rule requirements for PGCs.

Subsection with Requirement for PGCs	Document	Section	Page Numbers*
(c)(1)(A)(i)(I)	Executive Summary	Whole	1-4
(c)(1)(A)(i)(II)	Executive Summary	Indexed References Exhibit A	4 6-7
(c)(1)(A)(i)(III)	Executive Summary	Record of Distribution Exhibit B	5 8
(c)(1)(A)(i)(IV)	Executive Summary	Affidavits Exhibit C – applies to all named PGCs except Petra Nova Power I LLC Exhibit D applies to Petra Nova Power I LLC	5 9-11 12-14
(c)(1)(A)(ii)	EOP	Whole	All
(c)(4)(A)	Executive Summary	Record of Distribution Exhibit B	5 8
(c)(4)(B)	Executive Summary	Primary and Backup Emergency Contacts	5
(c)(4)(C)	Executive Summary	Exhibit C Exhibit D	9 12
(d)(1)(A)	EOP	Introduction Applicability	3 4
(d)(1)(B)	EOP	Responsible Individuals	5
(d)(1)(C)	EOP	Date, Controlling Version, and Revision Control Summary	5
(d)(1)(D)	EOP	Date, Controlling Version, and Revision Control Summary	5
(d)(1)(E)	EOP	Date, Controlling Version, and Revision Control Summary	5
(d)(2)(B)	EOP	Communications Plan: Communication with: - external media - the PUCT, OPUC - fuel suppliers - local and state governmental entities, officials - emergency operations centers, as applicable	6 6 6 6 6 6

		- the applicable reliability coordinator Attachment A	6 9
(d)(3)	EOP	Supplies Plan	6
(d)(4)	EOP	Staffing Plan	7
(d)(5)	EOP	Weather-Related Hazards Identification Plan	7
(d)(6)	EOP	Annexes	8
(e)(2)	EOP	Annexes (A) Cold Weather Emergency Fuel Switching Equipment Emergency Checklist (B) Hot Weather Emergency Emergency Checklist (C) Water Shortage/ Drought (D) Restoration of Service (E) Pandemic and Epidemic (F) Hurricane (G) Cyber Security and Physical Security Incidents(s) (H) Tornado (I) Restoration of Service for Greens Bayou Generating Station	15 20-21 23-26 33 39-42 52 56 197 209 225 297 306

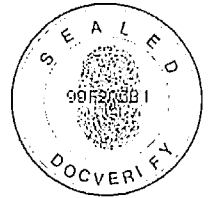
*Pages referenced in the Joint EOP may contain references to other pages within the Joint EOP, or its various parts, with the detail related to requirements.

CONFIDENTIAL

EXHIBIT B

RECORD OF DISTRIBUTION AND TRAINING

Exhibit B is being submitted confidentially.



2022.04.13 Joint PGCs Executive Summary-Affidavit signed notarized.pdf

DocVerify ID: 99F29681-10A4-4D0C-AEC1-163938999D93
Created: April 13, 2022 15:45:42 -6:00
Pages: 2
Electronic Notary: Yes / State: TX

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

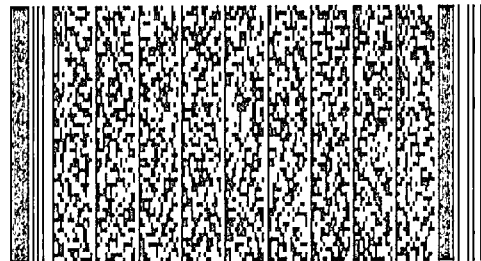
E-Signature 1: Dudley D Zahn (DDZ)

April 13, 2022 15:51:55 -6:00 [CF605F57661C] [149.19.42.26]
skip.zahn@nrg.com (Principal)

E-Signature Notary: Elizabeth Wolford (EW)

April 13, 2022 15:51:55 -6:00 [BF9AE7FBC02B] [149.19.42.26]
liz.wolford@nrg.com

I, Elizabeth Wolford, did witness the participants named above electronically sign this document.



DocVerify documents cannot be altered or tampered with in any way once they are protected by the DocVerify VeriVault System. Best viewed with Adobe Reader or Adobe Acrobat. All visible electronic signatures contained in this document are symbolic representations of the persons signature, and not intended to be an accurate depiction of the persons actual signature as defined by various Acts and/or Laws.

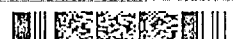


EXHIBIT C

AFFIDAVIT OF DUDLEY D. ZAHN

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

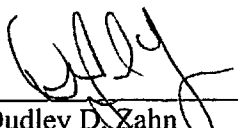
1. BEFORE ME, the undersigned authority, on this day personally appeared Dudley D. Zahn, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Dudley D. Zahn. My business address is 910 Louisiana Street, Houston, Texas 77002. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am currently employed as Vice President, Gulf Asset Management with NRG Energy, Inc. (NRG). Gregory Power Partners LLC (Certificate No. 20010), NRG Cedar Bayou Development Company, LLC (Certificate No. 20237), NRG Cottonwood Tenant LLC (Certificate No. 20537), NRG Texas Power LLC (Certificate No. 20184), are Power Generation Companies (PGCs) and are subsidiaries of NRG. I am authorized to make this affidavit on their behalf as Vice-President for each of these PGCs.
4. The above-listed PGCs, and Petra Nova Power I LLC (Certificate No. 20302), are collectively the NRG PGCs. A separate Affidavit is being provided on behalf of Petra Nova Power I LLC.
5. A separate Electric Service Emergency Operations Plan (ESEOP) is being submitted on behalf of the NRG owned Power Generation Company NRG South Texas LP (Certificate No. 20147).
6. Commensurate with the filing of this Affidavit, the PGCs are submitting a Joint Emergency Operations Plan (Joint EOP) for Power Generation Companies.
7. On behalf of the above-named PGCs in connection with the filing of the Joint EOP, I swear and affirm that:
 - i. All relevant operating personnel responsible for the critical operation of the NRG PGCs are familiar, will receive training or have received training on the applicable contents and execution of the Joint EOP and plant specific documents and are committed to following the plans and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are

99F29681-10A4-4D0C-AEC1-163938999D93 DocId:32962115 09/27/2022 15:45:47



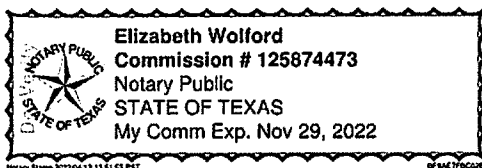
appropriate as a result of specific circumstances in the course of an emergency.

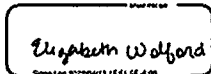
- ii. The NRG PGC's Joint EOP has been reviewed and approved by the appropriate NRG executives.
- iii. NRG PGCs will comply with the requirements for drills outlined in Rule §25.53. For 2022, drills are currently planned, or will be planned, in accordance with Rule § 25.53. NRG PGCs will comply with the new requirement for PGCs to provide notification of a drill 30 days prior to that drill.
- iv. The Joint EOP, or a summary, will be distributed to local jurisdictions, as deemed necessary.
- v. NRG maintains robust business continuity plans that cover corporate functions, plant operations, and wholesale operations. These plans clearly outline plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of the affidavit, assigned personnel have either completed the training or initiated the training process. All training will be completed within 90 days of this affidavit.



Dudley D. Zahn
Vice President, Gulf Asset Management
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 13th day of April 2022 to certify which witness my official hand and seal of office.





Notary Public in and for the State of Texas

Elizabeth Wolford

Printed or Stamped Name of Notary

My Commission Expires: November 29th, 2022





2022.04.14 Joint PGCs Executive Summary-Affidavit signed by GJK notarized.pdf

DocVerify ID: 7549FD48-C820-4A71-865C-71538E82A6D9

Created: April 14, 2022 13:27:24 -6:00

Pages: 2

Electronic Notary: Yes / State: TX

This document is a DocVerify VeriVaulted protected version of the document named above. It was created by a notary or on the behalf of a notary, and it is also a DocVerify E-Sign document, which means this document was created for the purposes of Electronic Signatures and/or Electronic Notary. Tampered or altered documents can be easily verified and validated with the DocVerify veriCheck system.

Go to www.docverify.com at any time to verify or validate the authenticity and integrity of this or any other DocVerify VeriVaulted document.

E-Signature Summary

E-Signature 1: Greg Kennedy (GK)

April 14, 2022 13:35:43 -6:00 [E89A1EAF32CB] [163.120.80.23]
greg.kennedy@nrg.com (Principal)

E-Signature Notary: Elizabeth Wolford (EW)

April 14, 2022 13:35:43 -6:00 [F0BD5146EA35] [163.120.80.23]
liz.wolford@nrg.com

I, Elizabeth Wolford, did witness the participants named above electronically sign this document.



EXHIBIT D

AFFIDAVIT OF GREG KENNEDY

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

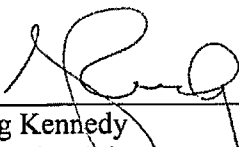
1. BEFORE ME, the undersigned authority, on this day personally appeared Greg Kennedy, who, after being duly sworn, stated on his oath that he is authorized and entitled to make this Affidavit, and that the statements contained below are true and correct.
2. My name is Greg Kennedy. My business address is 910 Louisiana Street, Houston, Texas 77002. I am over eighteen (18) years of age and I have personal knowledge of the facts contained herein, and to the best of my knowledge, they are true and correct.
3. I am currently employed as Sr. Project Director with NRG Energy, Inc. (NRG). Petra Nova Power I LLC (Certificate No. 20302), is a Power Generation Company (PGC) and a subsidiary of NRG. I am authorized to make this affidavit on behalf of Petra Nova Power I LLC as its President.
4. For Purposes of the filing of this Joint EOP, Petra Nova Power I LLC (Certificate No. 20302) plus Gregory Power Partners LLC (Certificate No. 20010), NRG Cedar Bayou Development Company, LLC (Certificate No. 20237), NRG Cottonwood Tenant LLC (Certificate No. 20537), and NRG Texas Power LLC (Certificate No. 20184), are collectively the NRG PGCs. A separate Affidavit is being provided in this submission on behalf of Gregory Power Partners LLC, NRG Cedar Bayou Development Company, LLC, NRG Cottonwood Tenant LLC, and NRG Texas Power LLC.
5. A separate Electric Service Emergency Operations Plan (ESEOP) is being submitted on behalf of the NRG owned Power Generation Company NRG South Texas LP (Certificate No. 20147).
6. Commensurate with the filing of this Affidavit, the NRG PGCs are submitting a Joint Emergency Operations Plan (Joint EOP) for NRG Power Generation Companies.
7. On behalf of the above-named NRG PGCs in connection with the filing of the Joint EOP, I swear and affirm that:
 - i. All relevant operating personnel responsible for the critical operation of the PGCs are familiar with, will receive training or have received training on the applicable contents and execution of the Joint EOP and plant specific

7 400 008 C820-4A71-865C-71538E82A6D9 171538E82A6D9 171538E82A6D9 171538E82A6D9



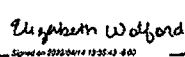
documents, and are committed to following the plan and the provisions contained therein in the event of a system-wide or local emergency that arises from natural or manmade disasters, except to the extent deviations are appropriate as a result of specific circumstances in the course of an emergency.

- ii. The Joint EOP has been reviewed and approved by the appropriate NRG executives.
- iii. NRG PGCs will comply with the requirements for drills outlined in Rule §25.53. For 2022, drills are currently planned, or will be planned, in accordance with Rule § 25.53. NRG PGCs will comply with the new requirement for PGCs to provide notification of a drill 30 days prior to that drill.
- iv. The Joint EOP, or a summary, will be distributed to local jurisdictions, as deemed necessary.
- v. NRG maintains robust business continuity plans that cover corporate functions, plant operations, and wholesale operations. These plans clearly outline plans to return to normal operations after a disruption caused by an incident.
- vi. The relevant emergency management personnel who are designated to interact with emergency management officials have been assigned to receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System Training. Due to the timing of the adoption of the rule and the due date of this affidavit, assigned personnel have either completed the training or initiated the training process. All training will be completed within 90 days of this affidavit.



Greg Kennedy
Sr. Project Director
NRG Energy, Inc.

SUBSCRIBED AND SWORN TO BEFORE ME on the 14th day of April 2022 to certify which witness my official hand and seal of office.

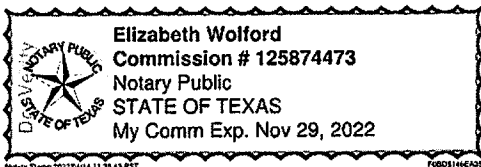


Notary Public in and for the State of Texas

Notary Public in and for the State of Texas

Elizabeth Wolford
Printed or Stamped Name of Notary

My Commission Expires: November 29th, 2022



7549FD48-C820-4A71-865C-71538E82A6D9 ... 2022/04/14 13:27:24 -0500



JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022



JOINT EMERGENCY OPERATIONS PLAN
FOR NRG ENERGY, INC.
POWER GENERATION COMPANIES

GREGORY POWER PARTNERS LLC
NRG CEDAR BAYOU DEVELOPMENT COMPANY, LLC
NRG COTTONWOOD TENANT LLC
NRG TEXAS POWER LLC
PETRA NOVA POWER I LLC

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

JOINT EMERGENCY OPERATIONS PLAN FOR NRG POWER GENERATION COMPANIES

TABLE OF CONTENTS

CONTENTS	PAGE
Introduction	3
Applicability	4
Responsible Individuals	5
EOP Date, Controlling Version, and Revision Control Summary	5
Communications Plan	6
Attachment A - Emergency Notifications	9
Annex E - Hurricane	209
Plan to Maintain Supplies	6
Plan to Address Staffing	7
Plan to Address Weather Related Hazards Identification and Activation	7
Annexes	8
Annex A – Weather Emergency Operational Plans	15, 33
Cold Weather Operational Plan	15
Adequacy of Fuel Switching Equipment	20-21
Cold Weather Checklist	23-26
Hot Weather Operational Plan	33
Hot Weather Checklist	39-42
Annex B – Water Shortage/ Drought	52
Annex C – Restoration of Service	56
Annex D – Pandemic and Epidemic	197
Annex E – Hurricane	209
Annex F – Cyber Security	225
Annex G – Physical Security Incident(s)	225
Annex H – Tornado Annex	297
Annex I – Restoration of Service (Limestone & GBY Generating Station)	306

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

Joint Emergency Operations Plan For NRG Energy, Inc. Power Generation Companies

Introduction

16 Tex. Admin. Code (TAC) § 25.53(d)(1)(A)

This Joint Emergency Operations Plan (Joint EOP) is submitted by and applicable to the NRG Energy, Inc. (NRG) owned Power Generation Companies (PGC) listed below and, collectively, they are referred to herein as NRG PGCs.

Gregory Power Partners LLC	Certificate No. 20010
NRG Cedar Bayou Development Company, LLC ¹	Certificate No. 20237
NRG Cottonwood Tenant LLC	Certificate No. 20537
NRG Texas Power LLC	Certificate No. 20184
Petra Nova Power I LLC	Certificate No. 20302

A separate Electric Service Emergency Operations Plan (ESEOP) is being submitted on behalf of the NRG owned Power Generation Company NRG South Texas LP (Certificate No. 20147).

The purpose of the Joint EOP is to provide guidance to be followed by the above-named NRG PGCs and applicable personnel in anticipation of, or in response to, any potential or actual business disruption impact, or with the potential to impact, NRG employees, customers, suppliers, shareholders, reputation, assets, or the environment, and to provide the framework for the continuation of operations.

¹ NRG Cedar Bayou Development Company, LLC is a PGC that owns 50% of Cedar Bayou unit 4. The other 50% of Cedar Bayou unit 4 is owned by the PGC named Odyssey Energy Cedar Bayou 4, LLC, a Delaware Limited Liability Company (formerly known as Optim Energy Cedar Bayou 4).

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

The Joint EOP is comprised of communication, emergency and crisis plans that address pre, mid, and post event efforts related to actual or potential crises and emergencies, including hazards and threats. The procedures outlined in the Joint EOP provide guidelines for actions necessary in the event of an emergency situation such as severe hot or cold weather, hurricane, water shortage or drought, pandemic/epidemic, cyber and physical security, and tornado. It is the responsibility of all personnel to ensure that the procedures outlined in the Joint EOP are maintained and carried out properly. As a whole, these plans are the Joint EOP and any activation of one is an activation of the Joint EOP. Unless otherwise indicated, the documents contained in this Joint EOP apply to all NRG PGCS.²

Applicability

16 Tex. Admin. Code (TAC) § 25.53(d)(1)(A)

The Joint EOP meets the requirements of 16 Tex. Admin. Code §25.53 with a compilation of relevant emergency operations documents that include all information required by the revised rule effective March 20, 2022.

NRG PGCS have extensive experience in preparing for and handling crises and emergencies. The contents of its pre-existing documents and practices for emergencies and crises have been executed and have proven effective over the years, including through multiple hurricanes.

The Joint EOP takes an all-hazards approach to emergency situations, with select additional detail for certain types of events. NRG has designed its crisis and emergency management framework to ensure teams and resources are available to respond to any crisis or emergency situation.

² The NRG PGCS also have separate, site-specific plans that address emergency operations.

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

Responsible Individual(s)
16 TAC § 25.53(d)(1)(B)

The Director, Business Continuity & Crisis Management, is responsible for maintaining and implementing NRG's Corporate Crisis Management Plan, which appears as Annexes F and G of the Joint EOP.

The name of the individual responsible for maintaining, implementing, and revising the Joint EOP, as a whole, is the VP, Regional Plant Operations for NRG Energy, Inc.

The names of the individuals responsible for maintaining, implementing, and revising the emergency operations plans that appear in Annexes A-E and H-I of the Joint EOP are named within each plan included in the annexes.

EOP Date, Controlling Version, and Revision Control Summary
16 TAC § 25.53(d)(1)(C), (D), and (E)

Each emergency plan comprising the Joint EOP was previously adopted and potentially previously revised and, therefore, each cites a specific date and controlling version, as well as a Revision Control Summary table.

This Joint EOP, as a whole, was approved April 13, 2022. It is the first submission made in compliance with the newly revised 16 Tex. Admin. Code §25.53 and supersedes any previous EOPs submitted by the above-named NRG PGCS, either individually or collectively, under any other Commission rule requirement.

The following table will include the applicable date of each change made to this Joint EOP since its original submission on this date.

Revision Number	Date	Change
1.0	April 13, 2022	Original submission

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

Communications Plan

16 TAC § 25.53(d)(2)(B)

NRG has a robust corporate communication plan to ensure that appropriate communication about an event is occurring, and that communications regarding business continue. The description of these communication procedures can be found in the Emergency Notifications Plan attached hereto as Attachment A, and also in the Hurricane Annex. Such procedures are indexed below for ease of reference.

Subject Part of Communications Plan	Document	Page Reference*
Communicating with Commission & Office of the Public Utility Counsel	EOP Attachment A	Whole, specifically 13-13
Communicating with the media	EOP Attachment A	Whole, specifically 13-14
Communicating with fuel suppliers	EOP Attachment A	Whole, specifically 13-14
Communicating with local and state governmental entities, officials, the reliability coordinator, and emergency operations centers	EOP Annex D – Pandemic & Epidemic	204
	EOP Attachment A	Whole, specifically 13-14

*Page number references are to the Joint EOP page number(s). Individual EOP documents may also have separate page numbering.

Supplies Plan

16 TAC § 25.53(d)(3)

Plant personnel are responsible for ensuring that adequate inventories of all commodities, equipment, and other necessary supplies are available during an emergency event.

The description of the supply plans can be found in the Annexes that comprise the Joint EOP and the chart below provides the location of certain information addressing supplies and supply management and maintenance during an emergency event.

	Document	Page Reference*
Plan(s) that Address Supplies	EOP Annex E – Hurricane	212-213, 215, 218
	EOP Annex A - Summer Weather	46, 48
	EOP Annex A – Winter Weather	20, 28
	EOP Annex D – Pandemic and Epidemic	202-204

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

EOP Annex B – Water Shortage/Drought	54-55
EOP Annex H – Tornado	301

Page number references are to the Joint EOP page number(s). Individual EOP documents may also have separate page numbering.

Staffing Plan

16 TAC § 25.53(d)(4)

NRG has robust staffing plans to ensure that appropriate staffing is available during an emergency event. Staffing for NRG PGCs during any emergency is carried out in accordance with detailed emergency readiness procedures. The following chart provides the location of specific information contained in the Joint EOP Annexes that address staffing during an emergency response.

	Document	Page Reference*
Plan(s) that Address Staffing	EOP Annex E – Hurricane	213, 216, 220-221, 224
	EOP Annex A – Summer Weather	37, 46
	EOP Annex A – Winter Weather	21-22, 28, 30
	EOP Annex D – Pandemic and Epidemic	202-204, 206
	EOP Annex H – Tornado	301

* Page number references are to the Joint EOP page number(s). Individual annexes may also have separate page numbering.

Weather-Related Hazards Identification and Activation Process

16 TAC § 25.53(d)(5)

NRG PGCs have developed emergency readiness procedures identifying the actions required to ensure reliable operation through the emergency event, and the process or steps that must be taken for activation of the appropriate emergency plan. Checklists are used to document completion of each task outlined.

The following chart provides the location in the Joint EOP of specific weather-related hazards identification information and the process for activation of the appropriate emergency or crisis plan:

Subject of Weather-Related Hazard Identification and Activation Process	Document	Page Reference*
Tornadoes	EOP Annex H – Tornado	300-304
Hurricanes	EOP Annex E – Hurricane	213-214

JOINT EMERGENCY OPERATIONS PLAN	PUCT DOCKET NO. 53385
FOR NRG ENERGY, INC. PGCS	Rev. 1.0 EFFECTIVE DATE: APRIL 13, 2022

Extreme cold weather	EOP Annex A – Winter Weather	21-22
Extreme hot weather	EOP Annex A-Summer Weather	37-38
Drought	EOP Annex B - Water Shortage/ Drought	54-55
Flooding	EOP Annex E – Hurricane	213-214, 220

* Page number references are to the Joint EOP page number(s). Individual annexes may also have separate page numbering.

Annexes

16 TAC § 25.53(e)(2)

Each of the named Annexes included in the Joint EOP is used to address a specific severe event or emergency situation, including a natural or man-made disaster, a pandemic, or a State Operations Center (SOC) declared event, including a hurricane. The Annexes contain emergency procedures and specific implementation requirements, responsibilities, and checklists specific to the type and scope of the emergency event, in accordance with requirements set by the PUCT. The Annexes are:

ANNEX A – Weather Emergency Operational Plans
Cold Weather Plan (including fuel switching equipment and a cold weather emergency checklist)
Hot Weather Plan (including hot weather checklist)
ANNEX B – Water Shortage/ Drought Plan
ANNEX C – Restoration of Service Plans
ANNEX D – Pandemic and Epidemic Plan
ANNEX E – Hurricane Plan
ANNEX F – Cyber Security
ANNEX G – Physical Security Incident(s) Plan
ANNEX H – Tornado Plan
ANNEX I – Restoration of Service Plans (Limestone & Greens Bayou Generating Station

**BATES NUMBERED PAGES JOINT EOP 00009- JOINT EOP 00014 – ATTACHMENT A
Communications Plan**

**BATES NUMBERED PAGES JOINT EOP 00015- JOINT EOP 00051 – ANNEX A -
Weather Related Emergency Operation Plan for Cold (Winter) Weather and Hot
Weather Plan**

**BATES NUMBERED PAGES JOINT EOP 00052- JOINT EOP 00055 – Annex B –
Water Shortage/Drought Plan**

**BATES NUMBERED PAGES JOINT EOP 00056- JOINT EOP 00196 – Annex C –
Restoration of Service Plans**

**BATES NUMBERED PAGES JOINT EOP 00197- JOINT EOP 00208 – Annex D –
Pandemic and Epidemic Plan**

**BATES NUMBERED PAGES JOINT EOP 00209- JOINT EOP 00224 – Annex E –
Hurricane Plan**

**BATES NUMBERED PAGES JOINT EOP 00225- JOINT EOP 00296 – Annex F and
Annex G – Cyber Security and Physical Security Incident(s) Plan**

**BATES NUMBERED PAGES JOINT EOP 00297- JOINT EOP 00305 – Annex H –
Tornado Plan**

**BATES NUMBERED PAGES JOINT EOP 00306- JOINT EOP 00334 – Annex I –
Restoration of Service Plans (Limestone & Greens Bayou Generating Station)**

REMOVED DUE TO CONFIDENTIALITY

CONSISTENT WITH 16 TAC § 25.53(c)(3)(A)(ii)