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EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

The Lubbock Power & Light (LP&L) 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 LP&L 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.

LP&L 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 LP&L, 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 LP&L's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that LP&L maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The LP&L EOP is organized based on the organizations ERCOT and NERC registration profiles, which effectively divide the organization by Transmission and Distribution Service Provider (TDSP) and Resource (RE) functions. This organizational approach is beneficial in terms of plan clarity, but also in plan usability and value to the organization. This also allows LP&L to better align with the requirements of the PUCT 16 TAC §25.53.

EOP Sections and Annexes

(Section-1) Approval and Implementation Section:

This section begins on page 9 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 LP&L's senior leadership, this section includes a "Message from the Director of Electric Utilities" that underscores the importance of the plan and encourages all LP&L personnel to learn the plan and work with their respective supervisors, department managers, and management teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for LP&L and describes the responsibilities of the EOP Plan Administrator - Transmission and Distribution Service Provider (TDSP) and the EOP Plan Administrator – Resource (RE), each assigned to ensure the plan is maintained and reviewed on a regular basis. The Director of Grid Control & Compliance is Plan Administrator for the TDSP EOP and the Chief Operating Officer is the Plan Administrator for the RE EOP.

EOP Sections 2-5 – (TDSP)

(Section-2) Communications Plan - TDSP:

This section begins on page 16 of the EOP and corresponds to §25.53(d)(2).

This section of the EOP is the Communications Plan which includes the strategies, key policies, roles, and communications steps that LP&L will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for LP&L, 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, LP&L 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 - TDSP:

This section begins on page 20 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 LP&L 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 - TDSP:

This section begins on page 21 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 LP&L 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 LP&L will utilize and addresses potential work schedules for LP&L personnel in significant and major system emergency events.

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

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

LP&L has policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. LP&L monitors and reports weather information to LP&L Electric Utility personnel. This 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 in accordance with the ERCOT Energy Emergency Alert Communications matrix.

EOP Annexes - TDSP

Weather Emergency Annex -TDSP:

This section begins on page 25 of the EOP and corresponds to §25.53(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 LP&L to develop and utilize checklists 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 before, during and after an extreme weather event. Weather will be monitored at the LP&L Transmission and Distribution Control Center by television, weather radio, and internet as necessary.

Load Shed Annex - TDSP:

This section begins on page 29 of the EOP and corresponds to §25.53(e)(1)(B).

LP&L has developed extensive planning documents to address response to emergency conditions including the requirement to shed load during and ERCOT EEA event. The three primary documents (included with the EOP as Appendices) that have been created to address these events are:

- LP&L Emergency Operations Plan – EOP-011-SOP-01
- LP&L Load Shed Plan – EOP-011-SOP-03
- LP&L Blackstart and Restoration Plan – EOP-005-SOP-01

These plans contain information regarding LP&L preparations and actions for ERCOT Emergency Event Alert (EEA) levels and includes details for the EEA Level-3 load shed events. The Designated ERCOT Transmission Operator (DTO) for LP&L participates in planning and preparation for load shed events and the Load Shed Plan contains detailed information regarding other operational information for EEA events.

This Annex also contains information on LP&L procedures for coordination of system restoration following a load shed event, and key policies and procedures that LP&L utilizes for restoration from significant system outage events. These plans also include LP&L'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 - TDSP

This section begins on page 29 of the EOP and corresponds to §25.53(e)(1)(C).

LP&L has created a Continuity of Operations Plan (see Appendices) that includes policies, procedures, and guidelines that are designed to prepare for potential threats to standard business operations including pandemic and epidemic outbreaks, and to effectively deal with ongoing operations, restoration and communications issues presented by an epidemic or pandemic event. Key elements of these policies address the steps LP&L takes regarding prevention and preparation, employee safety, working remotely, and methods to ensure adherence to policies implemented by state and local agencies.

Wildfire Annex - TDSP:

This section begins on page 29 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 LP&L'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 LP&L would take to respond to a wildfire event as well as a listing of state and national resources relating to wildfire services.

Hurricane Annex - TDSP:

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

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

Cyber Security Annex - TDSP:

This section begins on page 32 of the EOP and corresponds to §25.53(e)(1)(F).

LP&L has created a series of Cyber Security Policies (listed in the EOP) to prevent, mitigate and plan for recovery from all types of cyber-attacks on LP&L systems and facilities. These policies provide the

guidelines, procedures and best practices related to cyber security for the LP&L owned substation facilities, office facilities and electric transmission and distribution system.

The Operations Manager – CIP Senior Manager has developed and maintains an Incident Response Plan (IRP) that shall address the procedures that LP&L utilizes to protect the distribution system and respond to emergency events and situations. Based on LP&L's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security, perimeter security, and employee education.

Physical Security Incident Annex - TDSP:

This section begins on page 35 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures LP&L has implemented to protect the LP&L office complex, operations center, substations, system facilities and to respond to emergency events and situations. The Chief Operating Officer is responsible for annual review and maintenance of the LP&L Physical Security Plan. Based on LP&L's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for LP&L's facilities, visitors, and surveillance.

EOP Sections 2-5 (RE)

(Section-2) Communications Plan - RE:

This section begins on page 37 of the EOP and corresponds to §25.53(d)(2).

This section of the EOP is the Communications Plan which is intended to provide the communication guidelines, policies, procedures, and pre-developed content that Lubbock Power & Light (LP&L) generator operations shall utilize in all types and levels of emergency events including the strategies, key policies, roles, and communications steps that LP&L will undertake in an emergency event. Key policies include tracking and coordination of external communications, the designation of a spokesperson(s) for LP&L, 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 media, natural gas fuel suppliers, PUCT, OPUC, local and state governmental entities, officials, and (City/County) Emergency Operations Centers, and ERCOT. The Communications Plan shall be maintained and reviewed annually (or as needed) by the Public Affairs and Government Relations Manager in coordination with the Plan Administrator.

(Section-3) Pre-Identified Supplies for Emergency Response Plan - RE:

This section begins on page 41 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides guidelines for the procurement, storage, and maintenance of supplies that LP&L Generator Facilities will need during a natural disaster or disruptions of generation operations. It includes information on pre-Identified supplies for emergency response and identifies the guidelines for the management of materials, supplies and resources that LP&L 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; use of supply inventory lists, and other logistical information.

(Section-4) Staffing During Emergency Response Plan - RE:

This section begins on page 42 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP along with Appendix E, provides information regarding staffing during emergency response and the roles and assignments for LP&L 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 LP&L will utilize and addresses potential work schedules for LP&L personnel in significant and major system emergency events.

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

This section begins on page 43 of the EOP and corresponds to §25.53(d)(5).

LP&L has created a Weather-Related Hazards Identification Plan (Weather Plan) and EOP Activation Procedure which is reviewed annually (or as needed) by the Chief Operating Officer and/or the Electric production Superintendent to ensure that the information is current and that the process is operating effectively.

LP&L has policies, procedures, and information resources to maintain real-time situational awareness of the prevailing weather and of developing weather events, including, but not limited to tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, which may have an impact on LP&L's generator reliability, and the policies and procedures related to declaring an emergency and activating the EOP. This 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 – RE

Weather Emergency Annex -RE:

This section begins on page 48 of the EOP and corresponds to §25.53(1)(A).

The EOP Weather Emergency Annex addresses preparation for weather emergencies and provides for a process that enables LP&L personnel to respond to cold or hot weather emergency situations by following procedures, including but not limited to pre-event preparation, severity, duration, and potential impacts with the generation facility equipment as it relates to severe hot and cold weather. Preparedness measures, actions, and responsible personnel are specifically detailed for emergency levels 0-4 for cold weather and 0-3 for hot weather.

These key policies set forth the requirement for LP&L 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.

Water Shortage Annex – RE:

This section begins on page 53 of the EOP and corresponds to §25.53(2)(B).

The Water Shortage Annex is intended to provide a process that enables LP&L personnel to respond to any type; cooling, demineralized, and/or potable water emergency in order to limit generator Forced Outages, Derates, or Startup Loading Failure. Operations personnel shall follow these procedures, including but not limited to establishing priorities for recovery of generation capacity as quickly, and safely as possible.

Restoration of Service Annex – RE:

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

The Restoration of Service Annex is intended to provide a process that enables LP&L personnel to respond to a generator Forced Outage, Derate, or Startup Loading Failure by following procedures, including but not limited to establishing priorities for recovery of generation capacity as quickly, and safely as possible.

Pandemic and Epidemic Annex - RE

This section begins on page 55 of the EOP and corresponds to §25.53(e)(1)(C).

LP&L has created a Continuity of Operations Plan (see Appendices) that includes policies, procedures, and guidelines that are designed to prepare for potential threats to standard business operations including pandemic and epidemic outbreaks, and to effectively deal with ongoing operations, restoration and communications issues presented by an epidemic or pandemic event. Key elements of these policies address the steps LP&L takes regarding prevention and preparation, employee safety, working remotely, and methods to ensure adherence to policies implemented by state and local agencies.

Hurricane Annex - RE:

This section begins on page 55 of the EOP and corresponds to §25.53(e)(1)(E).

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

Cyber Security Annex - RE:

This section begins on page 56 of the EOP and corresponds to §25.53(e)(1)(F).

LP&L has created a series of Cyber Security Policies (see Cyber Security TDSP) to prevent, mitigate and plan for recovery from all types of cyber-attacks on LP&L systems and facilities. These policies provide the guidelines, procedures and best practices related to cyber security for the LP&L owned substation facilities, office facilities and electric transmission and distribution system.

The Operations Manager – CIP Senior Manager has developed and maintains an Incident Response Plan (IRP) that shall address the procedures that LP&L utilizes to protect the distribution system and respond to emergency events and situations. Based on LP&L's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security, perimeter security, and employee education.

Physical Security Incident Annex - RE:

This section begins on page 56 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures LP&L has implemented to protect the LP&L office complex, operations center, substations, system facilities and to respond to emergency events and situations. The Chief Operating Officer is responsible for annual review and maintenance of the LP&L Physical Security Plan. Based on LP&L's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for LP&L'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 LP&L executive management including the date the training was completed.

LP&L Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Joel Ivy	Director of Electric Utilities	5/19/2022	5/31/2022
Blair McGinnis	Electric Utility Chief Operating Officer	5/19/2022	5/31/2022
Chris Sims	Director of Grid Control & Compliance	5/19/2022	5/25/2022
Clint Gardner	Director of Customer Service	5/19/2022	6/1/2022
Kody Morris	Transmission and Distribution Manager	5/19/2022	5/31/2022
Luke Miller	Engineering Manager	5/19/2022	5/31/2022
Michael Winegeart	Electric Production Superintendent	5/19/2022	5/31/2022
Cody Kirk	Transmission Operator Supervisor	5/19/2022	5/31/2022
Tom Fox	Operations Manager	5/19/2022	6/1/2022
Jesse Salas	Safety/Loss Prevention Specialist	5/19/2022	6/1/2022
Harvey Hall	Chief Financial Officer	5/19/2022	6/1/2022
Jenny Smith	General Counsel	5/19/2022	6/1/2022

PROJECT NO. 53385

AFFIDAVIT OF DIRECTOR OF ELECTRIC UTILITIES

LUBBOCK POWER & LIGHT

PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF LUBBOCK §

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

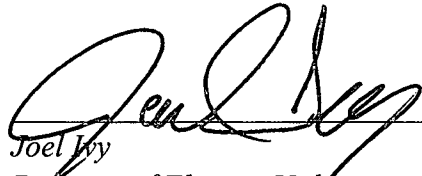
I, Joel Ivy, am of legal age, a resident of Texas, of sound mind, and capable of making this affidavit. I have personal knowledge of the facts herein, or am relying on people with personal knowledge. As the chief administrative officer of Lubbock Power & Light, and consequently, the highest-ranking representative with binding authority over Lubbock Power & Light, I swear or affirm the following facts are true and correct:

1. I am the Director of Electric Utilities for Lubbock Power & Light (LP&L), which is the municipally owned electric utility of the City of Lubbock, a home rule municipality in the State of Texas.
2. LP&L operates an electric utility system in the State of Texas and partially within the Electric Reliability Council of Texas (ERCOT) power region, and partially within the Southwest Power Pool.
3. The Emergency Operations Plan (EOP) has been distributed to relevant LP&L Managers and Operations personnel.
4. Relevant operating personnel at LP&L 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.
5. The EOP has been reviewed and approved by the appropriate executives.
6. Drills have been or will be conducted to the extent required by 16 TAC § 25.53(f). Specifically, in accordance with 16 TAC §25.53(f), a drill (tabletop exercise) for LP&L Operations personnel is scheduled for a date and time in CY2022 before September 30, 2022.
7. LP&L will notify Public Utility Commission of Texas (PUC) staff and the appropriate Texas Department of Emergency Management (TDEM) District Coordinators at least thirty (30) days prior to the drill.
8. LP&L has distributed the EOP or an appropriate summary to local jurisdictions as needed, including regional TDEM personnel and the Lubbock County Emergency Management

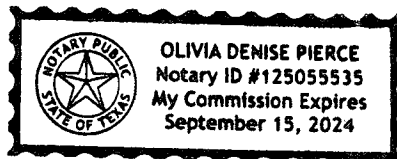
Coordinator.


9. LP&L maintains a Business Continuity Plan that addresses returning to normal operations after disruptions caused by an incident.
10. LP&L's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

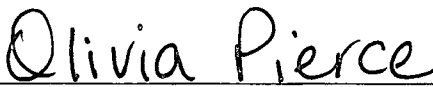
Affiant further sayeth not.


Joel Ivy
Director of Electric Utilities
City of Lubbock, acting by and through Lubbock Power & Light

SWORN to and SUBSCRIBED before me, the undersigned authority, by Mr. Joel Ivy on this the ____ day of June 1, 2022.




Notary Public in and for
The State of Texas


Printed Name of Notary
Commission Expires: Sept. 15, 2024

PUC Primary and Backup Emergency Contact List

Primary Emergency Contact:	Cody Kirk
Title:	Transmission Operator Supervisor
Email:	lpoperations@lpandl.com
Main Phone:	806-784-6049
Cell Phone:	806-577-2579

Secondary Backup Emergency Contact:	Tom Fox
Title:	Operation Manager
Email:	TFox@lpandl.com
Main Phone:	806-241-2456
Cell Phone:	806-241-2456