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eni new energy us

Eni New Energy US, Inc.
485 Madison Avenue
Floor 6,
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June 9, 2022

Public Utility Commission of Texas
PO Box 13326
Austin, TX 78711-3326

Re: Amended Executive Summary for Brazoria County Solar Project LLC EOP

To whom it may concern:

Brazoria County Solar Project LLC files this Amended Executive Summary to its Emergency Operations Plan to include the affidavit required by 16 TAC Section 25.53(c)(1)(A)(IV) at the end of the Executive Summary. The affidavit was inadvertently included as part of Brazoria County Solar Project LLC's full Emergency Operations Plan, filed on June 9, 2022. This Amended Executive Summary is unchanged from the initial filing aside from inclusion of the affidavit. Brazoria County Solar Project LLC does not submit any changes to its full Emergency Operations Plan at this time.

Enclosures:
Emergency Operations Plan - Executive Summary
Affidavit

Brazoria County Solar Project, LLC

Emergency Operations Plan – Executive Summary

Pursuant to the Public Utility Commission of Texas substantive rule 16 Texas Administrative Code (“TAC”) § 25.53, Electric Service Emergency Operations Plans, Brazoria County Solar Project, LLC (“PGC”) as a Power Generation Company (“PGC”) submits this Executive Summary.

In compliance with § 25.53(c)(1)(A), Brazoria County Solar Project, LLC additionally submits the below documents, attached hereto:

- An executed affidavit from its highest-ranking officer. § 25.53(c)(1)(A)(I)(d)
- A complete copy of its Emergency Operations Plan, with the confidential sections redacted. § 25.53(c)(1)(A)(ii)

The purpose of the Emergency Operations Plan is to detail the requirements and actions for emergency operations of the solar-powered electric generation facility in Texas, along with weather emergency preparedness measures undertaken at the facility. The Emergency Operations Plan consists of direct actions to be taken by site staff during emergency conditions as well as references to existing procedures and policies which staff should utilize during emergency conditions.

EOP Section Title/Content	EOP Section Reference & Page Number	25.53 Rule Requirement
Approval and Implementation: Purpose	Section 1, Page 3	(d)(1)(A)
Approval and Implementation: Applicability	Section 2, Page 3	(d)(1)(A), (D), & (E)
Approval and Implementation: Responsibilities	Section 4, Page 3	(d)(1)(B)
Approval and Implementation: Revision Control Summary	Section 5, Page 4	(d)(1)(C)
Weather Emergency Annex: Operations During Cold and Hot Weather Emergency	Annex 1, Page 67	(d)(2)(A)(i)
Weather Emergency Annex: Job Hazard Analysis – Inclement Weather – PPE Assessment	Appendix C, Page 31	(d)(2)(A)(iii)
Weather Emergency Preparedness	Section 6.2, Page 5	25.55
Water Shortage Annex: Emergency Shortage of Water	Annex 2, Page 68	(e)(2)(B)
Identification of Weather-Related Hazards Plan: Identification of Severe Weather Events and Weather-Related Hazards and Process for Activation of EOP	Section 6.4, Page 12	(d)(5)
Plan to Maintain Pre-Identified Emergency Supplies	Section 6.5, Page 12	(d)(3)
Plan to Address Staffing During Emergency Response	Section 6.6, Page 13	(d)(4)
Emergency Events Checklists	Section 6.7, Page 13	(e)(2)(D), (H), & 25.55
Alternative Fuels and Fuel Switching	Section 6.8, Page 13	(d)(2)(B) & (e)(2)(A)(ii)
Restoration of Service Annex	Annex 3, Page 69	(e)(2)(C)
Pandemic and Epidemic Annex: Pandemic/Epidemic Preparedness and Response	Annex 4, Page 70	(e)(2)(D)
Hurricane Plan Annex	Annex 5, Page 71	(e)(2)(E)
Cyber Security Annex: Cyber Security Incident Response	Annex 6, Page 72	(e)(2)(F)
Physical Security Annex: Physical Security Incident Response	Annex 7, Page 73	(e)(2)(G)
Winter Weatherization Readiness Report	Section 6.14, Page 16	25.55
Affidavit	Section 6.15, Page 16	(c)(4)(C)

Brazoria County Solar Project, LLC

Communication Plan	Section 6.16, Page 16	(d)(2)(B)
Declarations of Summer and Winter Weather Preparedness	Section 6.17, Page 18	N/A
Drills	Section 7, Page 18	(f)
Emergency Contact Information; Emergency Plan Contact Forms	Section 8, Page 19; Appendix L, Page 63	(c)(4)(B)
Drills and Record of Distribution: Reporting	Section 9, Page 19	(c)(4)(A) & (f)
Data Retention	Section 10, Page 19	(g)
Record of Distribution	Attached as part of this Executive Summary	(c)(4)(A)

Summary of EOP Components Required by 16 TAC § 25.53

Approval and Implementation

- Introduces the EOP and outlines applicability.
- Lists individuals responsible for maintaining and implementing the EOP, and those who can change the EOP.
- Provides a revision control summary that lists the dates of each changes made to the EOP since the initial EOP filing pursuant to paragraph (c)(1) of this section.
- Provides a dated statement that the current EOP supersedes previous EOPs.
- States the date the EOP was most recently approved by the entity.

Communications Plan

- Describes the procedures during an emergency for communicating with:
 - (1) the media
 - (2) the Commission
 - (3) OPUC
 - (4) Fuel suppliers - N/A for wind
 - (5) Local and state governmental entities, officials and emergency operations centers (as appropriate in the circumstances for the entity)
 - (6) the Reliability Coordinator (ERCOT)

Plan to Maintain Pre-Identified Supplies for Emergency Response

- Describes the plan to maintain pre-identified supplies for emergency response.

Plan to Address Staffing During Emergency Response

- Describes the plan to address staffing during an emergency response.

Plan to Address Identification of Weather-Related Hazards and EOP Activation

- A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to "activate" the EOP.

Brazoria County Solar Project, LLC

Summary of Annexes:

1. Weather Emergency Annex

- Operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under 25.55
- Verification of the adequacy and operability of fuel switching equipment, if installed - NOT APPLICABLE
- A checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

2. Water Shortage Annex

- Addresses supply shortages of water used in the generation of electricity

3. Restoration of Service Annex

- Identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat

4. Pandemic and Epidemic Annex

- Addresses the PGC's pandemic and epidemic response plan

5. Hurricane Annex

- Addresses the PGC's hurricane procedures, including evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM.

6. Cyber Security Annex

- Addresses the PGC's response plan to a cyber security incident.

7. Physical Security Annex

- Addresses the PGC's response plan to a physical security incident.

State of New York)
)
County of Westchester)

AFFIDAVIT

I, Claudio Piccinelli, being duly sworn, state that I am the President & Chief Executive Officer of Brazoria County Solar Project, LLC. In this position I have personal knowledge of the facts stated herein, and I affirm that to the best of my knowledge and belief (i) relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency, (ii) the EOP has been reviewed and approved by the appropriate executives (iii) drills have been conducted to the extent required by subsection (f) of this section, (iv) the EOP or an appropriate summary has been distributed to local jurisdictions as needed, (v) the entity maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident and (vi) the entity'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.

Any assertions of confidentiality regarding this filing have been made with a good faith belief that an exception to public disclosure under § 552.101 and § 552.110 of the Tex. Gov. Code applies to the information provided.



Claudio Piccinelli

Sworn and subscribed before me, a notary public, in and for the State of New York this 7 day of June 2022.



ROBERT THEODORE GAMBO
Notary Public, State of New York
No. 02GA6403881
Qualified in Westchester County
Commission Expires February 3, 2024