

# Filing Receipt

Received - 2022-06-24 02:55:44 PM Control Number - 53385 ItemNumber - 747



June 24, 2022

Ms. Jasmine Kirkland Central Records PUBLIC UTILITY COMMISSION OF TEXAS William B. Travis Bldg. 1701 N. Congress Avenue 7th Floor Austin, TX 78701

RE: Project No. 53385, Project to Submit Emergency Operations Plans and Related Documents under 16 TAC § 25.53

Dear Ms. Kirkland:

Enclosed for filing please find the following:

1. Oncor Electric Delivery Company LLC's Amended Public Utility Commission of Texas Emergency Operations Plan ("Oncor's PUC EOP").

2. Executive Summary of Oncor Electric Delivery Company LLC's Amended Public Utility Commission of Texas Emergency Operations Plan Pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i). Please note that Exhibit 1 to this Executive Summary has been redacted to remove the names of individuals who received access to or training on Oncor's PUC EOP. Exhibit 1 to this Executive Summary has not been revised as part of this amendment. Thus, Oncor is not resubmitting in this filing the confidential unredacted version of Exhibit 1 to the Executive Summary of Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan Pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i) that was previously submitted on April 13, 2022 in this Project.

In this Amended PUC EOP, Oncor has clarified Annex D. All other portions of Oncor's PUC EOP filed on April 13, 2022 remain unchanged. The Executive Summary of Oncor's PUC EOP has been revised to update the description of Annex D to ensure consistency with Oncor's Amended PUC EOP.

If you have any questions about this filing, please do not hesitate to contact me at 214.486.3512 or Thomas. Yamin@oncor.com.

Respectfully submitted,

Theomon J Damin

Thomas Yamin, P.E. Director of Regulatory Transmission and Planning

1616 Woodall Rodgers Freeway, Dallas, Texas 75202 214.486.3512. | Oncor.com

# PROJECT NO. 53385

§

§

§

PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53

# BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

# ONCOR ELECTRIC DELIVERY COMPANY LLC'S <u>AMENDED PUBLIC UTILITY COMMISSION OF TEXAS EMERGENCY</u> <u>OPERATIONS PLAN</u>

June 24, 2022

## **TABLE OF CONTENTS**

1.	Appro	Approval and Implementation				
	1.1	Introduction and Applicability				
	1.2	Revisions to Oncor PUC EOP				
2.	Communication Plan					
	2.1	Procedures for handling complaints during an emergency4				
	2.2	Procedures for communicating with the public during an emergency				
	2.3	Procedures for communicating with the media during an emergency6				
	2.4.	Procedures for communicating with customers during an emergency				
	2.5	Procedures for communicating with the Public Utility Commission of Texas during and emergency				
	2.6	Procedures for communicating with the Office of Public Utility Counsel during and emergency				
	2.7	Procedures for communicating with the local and state governmental entities, officials, and emergency operations centers during an emergency10				
	2.8	Procedures for communicating with ERCOT during an emergency				
	2.9	Procedures for communicating with Critical Load Customers directly served by Oncor during an emergency				
3.	Plan to Maintain Pre-Identified Supplies for Emergency Response					
4.	Plan for Staffing During Emergency Response14					
5.	Plan f	Plan for Identification of Weather-Related Hazards and Process for Activation of EOP 16				

6.	Annexes			
7.	Revisio	on Control Summary	.19	
Annex	А	Weather Emergency Annex	.20	
Annex	В	Load Shed Annex	.23	
Annex	С	Pandemic and Epidemic Annex	.37	
Annex	D	Wildfire Annex	.41	
Annex	E	Cyber Security Annex	.44	
Annex	F	Physical Security Incident Annex	.48	
Annex	G	Plan for Use of Facilities under PURA § 39.918(b)(1) or (2)	.49	

#### PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY§OPERATIONS PLANS AND RELATED§DOCUMENTS UNDER 16 TAC § 25.53§

BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

#### Oncor Electric Delivery Company LLC'S Amended Public Utility Commission of Texas Emergency Operations Plan

June 24, 2022

### **1.** Approval and Implementation

#### **1.1 Introduction and Applicability**

Through its normal course of business, Oncor Electric Delivery Company LLC ("Oncor" or "Company") monitors its transmission, substation, and distribution facilities 24 hours a day, seven days a week. Oncor's Transmission Grid Operations organization is responsible for the safe and reliable remote operation of Oncor's transmission grid in coordination with the Electric Reliability Council of Texas, Inc. ("ERCOT") and other Transmission Operators across the system. Oncor has two Distribution Operating Centers ("DOCs") that have responsibility for directing operations for Oncor's distribution system and for working directly with Oncor's Transmission organization on issues that affect both the distribution system and the transmission system. Oncor's DOCs continuously monitor the distribution system, coordinate system switching and clearances with Oncor's distribution field organizations, and manage system outages and anomalies to restore service and system normalcy in an efficient and expeditious manner.

When there is an outage on Oncor's transmission, switching station, or substation equipment, Transmission Control Room staff respond using remote capabilities or by directing field personnel to restore service, thereby reducing customer outage time and restoring system integrity. As interruptions occur on the distribution system, Oncor's DOCs direct Oncor's strategically placed workforce of service restoration specialists who are on duty and on call 24 hours a day to make any necessary repairs.

3

Oncor's three Regional Distribution Operations groups are responsible for outage response and emergency restoration, and personnel from Oncor's Distribution Engineering and Distribution Services support those Regional Distribution Operations groups in helping to restore power to customers. If any of the three Regional Distribution Operations groups determines additional support beyond their assigned Oncor workforce is needed to respond to a large storm or major event, both Distribution Engineering and Distribution Services have access to significant contractor resources to assist with restoration efforts.

This Amended Public Utility Commission of Texas ("PUC") Emergency Operations Plan ("Oncor PUC EOP") applies to Oncor, the transmission and distribution service area it serves, and the facilities it operates, including those facilities it operates on behalf of Oncor Electric Delivery Company NTU. This Oncor PUC EOP applies when there is an emergency on Oncor's transmission and distribution system, including the facilities owned by Oncor Electric Delivery Company NTU. For purposes of this Oncor PUC EOP, "emergency" has the same meaning included in 16 Tex. Admin. Code ("TAC") § 25.53(b)(3).

This Oncor PUC EOP does not apply to those facilities owned by Sharyland Utilities, L.P. ("Sharyland") and operated by Oncor pursuant to an Operation Agreement dated May 16, 2019, except that Oncor will communicate with ERCOT as specified in Section 2.8, below, during an emergency on behalf of Sharyland with respect to the operation of facilities owned by Sharyland and operated by Oncor.

Oncor's Chief Operating Officer has assigned responsibility for maintaining and implementing this Oncor PUC EOP to the manager of Oncor's Mutual Assistance and Emergency Preparedness group. Any revision to this Oncor PUC EOP must be approved by the manager of Oncor's Mutual Assistance and Emergency Preparedness group.

# **1.2 Revisions to Oncor PUC EOP**

Revisions to this Oncor PUC EOP will be tracked in the Revision Control Summary included in Section 7, below.

## 2. Communication Plan

#### 2.1 **Procedures for handling complaints during an emergency.**

During an emergency, Oncor customers may contact the Company via telephone inquiry concerning a complaint. Oncor's telephone number for general inquiries is 888-313-6862. The telephone number to report a power outage is 888-313-4747 and is staffed 24 hours a day.

A customer may also contact Oncor through its website at <u>Oncor.com</u> or via social media to engage with an Oncor representative. The Oncor.com website provides mechanisms for customers to report a power outage, downed power lines, or streetlight outages. To locate underground power lines, the customer should dial 811.

All complaints are escalated to an internal Customer Relations team to manage until resolved. The Customer Relations team reviews the complaint to determine its nature and then conducts a thorough investigation. When applicable, the Customer Relations team requests assistance from internal work groups. Customer Relations may contact the customer to complete the resolution.

To file an informal complaint, the customer should submit a complaint through the PUC's website at: <u>https://www.puc.texas.gov/Complaints/Index?utiliType=E&culture=en-US</u> or contact the PUC by calling the PUC's Assistance Hotlines: 888-782-8477 or 512-936-7120 or by emailing the PUC at <u>customer@puc.texas.gov</u>.

The customer may also contact the PUC at the following address:

Public Utility Commission of Texas 1701 N. Congress Avenue PO Box 13326 Austin, TX 78711-3326

#### **2.2** Procedures for communicating with the public during an emergency.

Providing accurate and timely communication to the public during an emergency is a critical part of Oncor's corporate objective and an integral part of Oncor's everyday business. Oncor's communications with the public are managed by Oncor's communications organization.

That organization participates in calls with Oncor's management before, during, and after emergencies. Oncor focuses on providing easily understandable safety information, restoration details, and event updates using a number of communications channels, including:

- Communicating with the News Media as described in Section 2.3 below;
- Social Media;
- Oncor's website, Oncor.com;
- "My Oncor Alerts" and "MyOncor" Mobile Applications;
- Oncor's Call Center at 888-313-4747;

- Banners and alerts posted to the Powered By Oncor portal used by commercial and industrial customers; and
- Proactive live outbound calls when applicable.

#### **2.3** Procedures for communicating with the media during an emergency.

Oncor's communications with the media during an emergency are managed by Oncor's communications organization. That organization provides storm preparation, safety, and restoration information and other event updates to the news media through news releases or notifications, and through interviews of Oncor personnel conducted by individual news outlets. If available, the communications team shares photos or videos with media that they can broadcast and share with their audiences.

The news media also makes use of Oncor's Storm Center Outage Map, which can be found on Oncor.com or at <u>stormcenter.oncor.com</u> to find information about power interruptions within the Oncor service territory and share that information on-air or in print with their audiences. The map provides overall outages, outages by zip code, outages by county, and restoration times.

Oncor's brand journalism site, The Wire, which can be found at <u>thewire.oncor.com</u>, provides access to all news releases, updates and safety communication for media as well as the public (storm, emergency and safety content is also available in Spanish). All news releases are posted on this site for easy access, use, and sharing. The Company also has established a partnership with Spanish-language radio station 107.5 FM to share and broadcast updates with their audiences during emergencies or storm events. In addition to providing general media briefings and communications, Oncor also staffs and manages a hotline specifically for the news media in order to respond promptly to any of their inquiries 24 hours a day/seven days a week.

#### 2.4 **Procedures for communicating with customers during an emergency.**

Oncor uses various channels to communicate directly with customers during an emergency. They include:

## 2.4.1 Social Media

During an emergency or storm event, the cadence of proactive communications via Oncor's social media channels increases and serves as an outlet to quickly relay vital information to customers. Safety, storm restoration progress, weather alerts and videos, forecasts, including live-streaming from Oncor's in-house meteorologist, and other event updates are shared on Oncor's social media channels, including Facebook and Twitter. Specific safety and emergency communications are also translated to Spanish and shared via these channels. In addition to the

stream of proactive messages and updates, customers can directly reach out to Oncor using these channels. Both Facebook and Twitter are monitored 24/7 and allow Oncor to respond to individual customer inquiries or concerns and escalate as needed.

#### 2.4.2 Oncor.com

The Oncor website delivers important customer messages during emergency conditions through banner messages on both the home page and the Storm Center Outage Map. Customers can view these pages using a computer or a mobile device. Safety, storm or restoration related messages can be specific to a particular area or provide general information. Customers can also find The Wire, via Oncor.com, which is Oncor's brand journalism site, and where all news releases and media and customer safety information is also shared. Oncor.com, the Storm Center Outage Map, and The Wire are also available in Spanish.

From the Oncor.com home page, customers can click to view the <u>Outages & Weather</u> page and also find ways to report an outage, view the outage map, report or check the status of an existing outage, as well as find the phone number to call Oncor about an outage, enroll in the "My Oncor Alerts" text program, or download the "MyOncor" mobile app. The page also hosts "Weather Current," a community outreach effort to keep customers informed about weather conditions. These up-to-date forecasts, severe weather alerts, and timely safety information are produced by Oncor's in-house meteorologist and shared on the website and via social media. The website also provides a "Frequently Asked Questions" ("FAQs") section for general topics as well as outages and restoration. In addition, specific FAQs can also be developed, depending on the emergency event.

Oncor.com also offers a virtual assistant that is available 24/7 to respond to customer inquiries, report outages and provide status updates.

# 2.4.3 "My Oncor Alerts" and "MyOncor" Mobile Applications

In addition to Oncor's other communications sources, Oncor communicates directly with customers who have enrolled in the Company's customer text messaging program, "My Oncor Alerts" or the "MyOncor" app via text, email, automated phone calls and mobile applications. Oncor's Customer Engagement group has responsibility for those communications during an emergency. Customers may also report outages through Oncor.com, the "MyOncor" app or through "My Oncor Alerts." Oncor then provides confirmation of the report and automatic status updates throughout the restoration process. Customers who use the text option to report outages

can also receive updates upon request. Additionally, Oncor ensures that its Area Managers and front-line employees know the Oncor PUC EOP so they can effectively communicate and coordinate with the cities, counties and customers that Oncor serves ahead of, during, and after emergency events. Oncor also utilizes the "My Oncor Alerts" platform to send ad-hoc messages to customers impacted in specific situations, such as extended outages or areas with severe damages.

#### 2.4.4 Call Center

Customers can report outages by calling Oncor's Customer Contact Center, which is staffed 24-hours every day. During normal business hours, the Customer Contact Center responds to all types of customer calls. Oncor's telecommunication system is designed in such a way that calls flow to the first available agent. An automated outage reporting system is used to handle outage calls during peak periods, and the system is designed to handle large volumes of calls simultaneously. During major emergencies, Contact Center staffing levels are increased. Oncor utilizes a surge program to expand Contact Center staffing during high volume time frames. This allows Oncor to leverage the mutual assistance of Contact Center agents from other companies to assist using a common vendor to maintain security. The Customer Contact Center has an escalation process in place at all times, which allows complaints or escalated issues to be routed to the appropriate personnel.

When weather impacts threaten Oncor's service territory, the Oncor Contact Center prepares a comprehensive staffing plan. This plan is modified based on actual conditions, and additional personnel from internal resources are utilized to assist with social media and online Chat functions. Oncor's 24/7 Contact Center is served from two different utility feeders and a backup generator for triple redundancy. Customer service personnel are geographically dispersed in various locations within Texas to ensure business continuity.

#### 2.4.5 Testing Internal Communications

To help ensure that internal communication is available during emergency situations, the Oncor internal emergency communications system is tested weekly. Testing may be postponed during system events, but will be accomplished at least once per month. The test includes testing satellite phones and radios between Oncor's Transmission Grid Operations ("TGO") and Oncor's Distribution Operations Centers ("DOCs"). In addition, the emergency generators that supply

power to communication systems located in Oncor's DOC and TGO facilities are tested on a programmed schedule.

## 2.4.6 Testing External Communications

Customer communication platforms are built with redundancy and failover capabilities and are tested on a regular schedule dependent upon the type of platform. In addition, platforms such as social media are monitored for security. To ensure critical operations are maintained, Contact Center telephony platforms offer redundant locations with 24/7 monitoring.

# 2.5 Procedures for communicating with the Public Utility Commission of Texas during an emergency.

Oncor's Regulatory Affairs Group is responsible for maintaining close communications with the PUC in the event of an emergency. The Group's communications with the PUC generally involve providing accurate and timely information prior to, during, and after an emergency occurs. The Regulatory Affairs Group is also responsible for timely responding to any PUC requests for information concerning an emergency.

While some emergencies occur suddenly and with little advanced warning, Oncor strives to proactively communicate with the PUC concerning an emergency to the extent possible. Prior to a forecasted emergency, the Regulatory Affairs Group participates in preparatory calls with Oncor's management and provides the PUC relevant information on preparations Oncor is making and has made for an event. Oncor's Regulatory Affairs Group also participates in external discussions with entities such as the Texas Division of Emergency Management and the Texas Energy Reliability Council, as requested.

Upon activation of the Oncor PUC EOP, the Regulatory Affairs Group notifies the PUC and provides updates in the manner and cadence prescribed by the PUC in 16 TAC § 25.52(e)(1). These updates include information such as the approximate number of customer outages, the general location of affected area(s), and the estimated time of restoration, when known. The Regulatory Affairs Group continues to provide these updates and respond to any PUC inquiries and requests throughout the emergency, including dispatching an Oncor representative to the State Operations Center when requested.

After the conclusion of an emergency event, the Oncor Regulatory Affairs Group provides a summary report, pursuant to 16 TAC § 25.52(e)(2) and responds to any post-event requests from the PUC.

# 2.6 Procedures for communicating with the Office of Public Utility Counsel during an emergency.

Oncor's Regulatory Affairs Group is responsible for maintaining close communications with the Office of Public Utility Counsel ("OPUC") in the event of an emergency. The Group's communications with OPUC generally involve providing accurate and timely information prior to, during, and after an emergency occurs. The Regulatory Affairs Group is also responsible for timely responding to any OPUC requests for information concerning an emergency.

While some emergencies occur suddenly and with little advanced warning, Oncor strives to proactively communicate with OPUC concerning an emergency to the extent possible. Prior to a forecasted emergency, the Regulatory Affairs Group participates in preparatory calls with Oncor's management and provides OPUC relevant information on preparations Oncor is making and has made for an event.

Upon activation of the Oncor PUC EOP, the Regulatory Affairs Group notifies OPUC and provides the same updates provided to the PUC in the manner and cadence prescribed by the PUC in 16 TAC § 25.52(e)(1). These updates include information such as the approximate number of customer outages, the general location of affected area(s), and the estimated time of restoration, when known. The Regulatory Affairs Group continues to provide these updates and respond to any OPUC inquiries and requests throughout the emergency.

After the conclusion of an emergency event, the Oncor Regulatory Affairs Group provides OPUC the same summary report provided to the PUC pursuant to 16 TAC § 25.52(e)(2) and responds to any post-event requests from the OPUC.

# 2.7 Procedures for communicating with the local and state governmental entities, officials, and emergency operations centers during an emergency.

Oncor's communications with local and state governmental entities, officials, and emergency operations centers during an emergency are the responsibility of Oncor's Market Relations group. Oncor's communications with the local and state governmental entities, officials, and emergency operations centers are intended to provide information as appropriate in the circumstances for the entity.

# 2.7.1 Local Governmental Entities, Officials, and Emergency Operations Centers

Oncor employees who are Community Liaisons are responsible for communications with local governmental entities. Officials, and emergency operations centers during an emergency.

The Community Liaison is responsible for facilitating the exchange of information with cities and towns regarding the status of restoration efforts, including escalations of critical city infrastructure (*i.e.*, Critical Load Public Safety/Business Awareness) customers. Their specific responsibilities include the following:

- Provide updates on Oncor's System Emergency Center ("SEC") Conference Call of significant customer or community issues;
- Participate in scheduled Information and Liaison Communication Conference calls;
- Provide approved status updates and key messages to Area Managers for use and dissemination to cities/towns as appropriate; and
- Coordinate with social services agencies, as needed.

In the event of Fire/Police escalations, the Community Liaison is responsible for receiving calls from the Customer Contact Center's emergency response line and escalating to SEC operations.

The Community Liaison also maintains log of issues addressed during each shift to assist in transition at shift change and manages resources engaged in Storefront locations. Oncor's staffing of municipal or county emergency operations centers is discussed in Section 4.2 below.

For emergency events that have a major impact on the Dallas-Fort Worth Metroplex, the Customer Operations Executives responsible for Dallas and/or Fort Worth focus on their respective cities and will not serve in the broader Community Liaison role in the SEC.

In those counties in which Oncor owns transmission facilities but does not serve end-use customers, the applicable Oncor Area Manager is responsible for communicating with local governmental entities or emergency operations centers during an emergency if necessary.

# 2.7.2 State Governmental Entities, Officials, and Emergency Operations Centers

Oncor's Governmental Affairs team is notified when the Oncor PUC EOP is activated. The Governmental Affairs team then proactively contacts appropriate state government officials (including Executive Branch officials) and members of the Legislature to (1) describe the emergency and its anticipated duration and potential impacts on customers, (2) address any issues identified by the officials, and (3) answer additional questions that surface during the emergency condition. The Governmental Affairs Team also ensures that members of the applicable Legislative Committees, including the House State Affairs Committee and the Senate Business

and Commerce Committee, are notified of the emergency and receive updates during the emergency. If the emergency is localized and not applicable to Oncor's entire system, the Governmental Affairs Team contacts those members of the Legislature who serve the affected areas.

As noted in section 2.5 above, the Oncor Regulatory Affairs Group dispatches an Oncor representative to the State Operations Center when requested.

## 2.8 **Procedures for communicating with ERCOT during an emergency.**

Oncor's communications with ERCOT during an emergency are the responsibility of Oncor's TGO organization. Oncor follows the applicable ERCOT Nodal Protocols and Operating Guides and the applicable Reliability Standards issued and enforced by the North American Electric Reliability Corporation ("NERC") when communicating with ERCOT. It also follows its own internal Standard Operating Procedures in providing notifications to, receiving notifications from, and communicating with ERCOT. In general, during an emergency, those protocols require that Oncor's Control Room personnel (1) use three-part communication when ERCOT is communicating an operating instruction; (2) promptly respond to requests or operating instructions from ERCOT during an emergency; and (3) perform any actions as instructed by ERCOT.

In accordance with the requirements identified above, Oncor's Control Room personnel follow the designated protocols for communicating with ERCOT and are trained on those requirements. Oncor also reviews the Control Room personnel's adherence to those communication protocols and the effectiveness of the communication protocols on an annual basis. To help ensure that communication channels are available during emergency situations, all communication systems used to communicate with ERCOT are tested on a weekly basis.

Annex B to this Oncor PUC EOP outlines the specific procedures for communications with ERCOT during a Load Shed Event.

# 2.9 Procedures for communicating with Critical Load Customers directly served by Oncor during an emergency.

In the event of an ERCOT Energy Emergency Alert ("EEA") level 2 or 3, Oncor sends a proactive message to critical load customers notifying them of the alert. In addition, Oncor sends a message when the alert has been canceled. Additional contact with critical load customers by Oncor personnel may be made to notify them regarding the approximate length and severity of an outage, or to confirm that service has been restored. Communicating with critical load customers

12

is considered part of Oncor's normal business operation, which will continue during emergency operations.

Oncor provides critical load customers advance notice, if reasonably possible, if Oncor must interrupt delivery service in the event of an emergency. If ERCOT makes a public statement regarding an anticipated EEA 3 event in advance of an emergency situation, Oncor will provide a voice message or text message 24 hours prior to the possible EEA 3 event. If advance notice of an EEA 2 event or EEA 3 event is not available to Oncor, Oncor will provide a voice message or text message to critical load customers as soon as possible after ERCOT issues either an EEA 2 or EEA 3.

Critical load customers may enroll in "My Oncor Alerts" or download the "MyOncor" App described in Section 2.4 of this Oncor PUC EOP for increased communication and awareness. Customers may also access Oncor's document titled, "Important Information About Electricity Load Shedding and What It Could Mean to You" on Oncor's website.

#### 3. Plan to Maintain Pre-Identified Supplies for Emergency Response

Oncor has pre-kitted emergency material stock on-hand at its central distribution center in the Dallas-Fort Worth Metroplex and West Texas ready for deployment at all times. In addition to the pre-kitted material, Oncor keeps additional storm stock in inventory at both the central distribution centers and local service center storerooms across Oncor's service territory to supplement the kits. Other on-hand materials that are generally deployed to support growth across the system can also be re-allocated to restoration work, as needed. Oncor used standardized equipment and materials across its system to facilitate this practice.

With respect to electrical equipment, Oncor has pre-identified those long-lead-time assets that may be needed in emergencies and maintains a working reserve quantity to meet unexpected failures or emergency needs. By maintaining an adequate working reserve of this equipment, Oncor is able to quickly address equipment failures sustained during storms or extreme weather.

Oncor also utilizes both vendor owned and vendor managed inventory programs to optimize the availability of emergency stock and provide the ability to quickly purchase material and equipment without incurring any shipping delays.

Oncor has identified 87 emergency material staging sites available across its service territory that can be quickly secured and prepared to serve as material and equipment laydown yards. These staging sites allow for a more expedited material and equipment deployment to

Oncor, contractor, and/or mutual assistance crews during storm restoration events. If enough prior warning is available before a storm event, staging sites will be pre-staged so that material and equipment is in place and ready for use as soon as weather conditions allow for restoration work to begin.

Oncor relies on long-term contracts and relationships with suppliers to ensure that safety stock is secured and active supplier engagement is provided for Oncor during emergency restoration events. Many of these contracts include widely utilized labor and material indices that set the commodity portion of Oncor's materials and services and protect lead times and production allocations.

In addition, Oncor's supply chain organization works very closely with engineering and other key internal stakeholders to find alternate approved suppliers and material solutions in order to pre-approve a diversified group of suppliers in critical material categories, which provides Oncor with more potential sources for material in emergency restoration events.

Oncor also participates in several mutual assistance programs with other utilities located both inside and outside of Texas. These programs are discussed in Section 4.4, below. Through these programs, Oncor is able to request emergency labor, material, and equipment assistance from other participating utilities. Not only do participating utilities provide each other with on-hand spare inventory when possible, they also share supplier contacts and other leads that contribute to more efficient acquisition of material and equipment in emergency situations.

# 4. Plan for Staffing During Emergency Response

Oncor's real-time operations are managed by two DOCs and one TGO facility that are staffed 24 hours a day, 7 days a week. During emergencies, Oncor staffs its DOCs, TGO, Customer Contact Centers, and the SEC 24 hours a day, seven days a week, all of which are prepared to address any emergency that may occur in Oncor's service area. Depending on the severity of the emergency, Oncor may initiate its Incident Command System ("ICS") as specified by the National Incident Management System ("NIMS"). ICS allows for the expansion and contraction of resources as the magnitude of the situation changes.

## 4.1. Staffing at DOCs and TGO

The operations personnel who staff the DOCs and TGO are trained annually to respond to and address different emergency conditions. Oncor's SEC is also staffed and utilized when the size of an emergency dictates centralized command and communications. The employees at the DOCs, TGO, and SEC include transmission and distribution operations personnel, supervisors, and management level employees, many of whom also have received NIMS and other emergency preparedness training.

Oncor also maintains an electronic contact listing (with ongoing updates) for staffing of the emergency centers to respond to large events or predicted major weather events (*e.g.*, ice storms). This list contains enough individuals for each position allowing for a 12-hour rotation if needed. Additionally, the individual emergency and service centers maintain call out lists (line workers, managerial, and technical), and the operation centers maintain rotational rosters due to their 24/7 operations. On a broader scale, Oncor will use its messaging system (text, voice, and email) to notify other managers and supervisors when additional personnel are needed for significant storms.

#### 4.2. Staffing at Municipal or County Emergency Operations Centers

Many of the municipalities and counties served by Oncor have their own emergency operations centers with a position reserved for an Oncor employee trained in emergency preparedness and response during an emergency. Oncor's Area Managers and the Liaison Section of the SEC also work closely with municipalities to identify critical loads and other key municipal infrastructure to be addressed during an emergency, as well as other contingency plans. Oncor's Area Managers (*i.e.*, Oncor employees that partner with federal, state, and local public officials) have received NIMS training and Oncor-specific training regarding Oncor's ICS as specified by 16 TAC § 25.53. To the extent possible, Oncor representatives will participate in emergency drills conducted by any municipalities or counties in its service area.

# 4.3. Staffing at Customer Contact Center

During emergencies, Oncor utilizes a surge program to expand Contact Center staffing during high volume time frames. This allows Oncor to leverage the mutual assistance of Contact Center agents from other companies to assist using a common vendor to maintain security. The Customer Contact Center has an escalation process in place at all times, which allows complaints or escalated issues to be routed to the appropriate personnel. Oncor's 24/7 Contact Center is served from two different utility feeders and a backup generator for triple redundancy. Customer service personnel are geographically dispersed in various locations within Texas to ensure business continuity.

#### 4.4. Staffing of Service Restoration Specialists

As interruptions occur, Oncor's strategically placed workforce of service restoration specialists who are on duty and on call 24 hours a day are utilized to make any necessary repairs. If additional support beyond the Oncor workforce is needed to respond to a large storm or major event, Oncor has access to significant contractor resources to assist with restoration efforts.

Oncor participates in and provides leadership in three major Regional Mutual Assistance Groups ("RMAGs") – the Southeastern Electric Exchange, the Texas Mutual Assistance Group, and the Midwest Mutual Assistance Group. When a storm or other disaster hits Oncor's service territory that is of such a great magnitude that Oncor alone cannot provide a quick response, Oncor has the ability through these RMAGs to receive help from many other utilities from various regions of the country. This enables Oncor to get power restored more quickly after a significant storm or disaster. Each utility receiving mutual assistance pays the utility providing the assistance for the work performed by their employees.

#### 5. Plan for Identification of Weather-related Hazards & Activation of EOP

Oncor constantly monitors the weather in its service area, including severe weather, as part of its ongoing operation. Oncor has contracted with private weather information providers and uses the National Weather Service public information and broadcast news networks to review available weather information. Oncor's DOCs, TGO, and Emergency Preparedness team monitor this weather information 24 hours a day, seven days a week, and that weather information is available to field locations through a secure web based application.

Oncor's Emergency Preparedness team checks the National Weather Forecast Offices in Texas daily for any significant unfavorable weather and shares that information with the Oncor Weather Distribution list when severe weather is predicted. Oncor also contracts with private weather information providers, and those contracts include the ability to ask related questions to private meteorologists, such as timing, strength, duration, etc. of potential severe weather. Additionally, Oncor receives severe weather forecast summaries for large scale storm outbreaks (*e.g.*, tornadoes, severe thunderstorms, wind, or ice) on an as needed basis when predicted. If there is sufficient warning prior to an anticipated storm or event, the Emergency Preparedness team will set up calls with Oncor's private weather information providers to obtain the most up to date information on what can be expected to impact Oncor's service territory. These calls include

Oncor's Transmission and Distribution Regional Directors, Oncor's Supply Chain personnel, DOCs, TGO, and other Oncor teams as the weather event approaches.

In addition to Oncor's internal research for significant weather events, Oncor receives notices from the NOAA Federal Fort Worth/Dallas office when a significant weather event is forecasted to impact the area.

Depending on the severity of the weather forecast, Oncor will convene key members of its ICS and may preemptively enact this Oncor PUC EOP and pre-position staff at various locations. That group is authorized to enact the Oncor PUC EOP and the emergency plans identified as Annexes to this Oncor PUC EOP.

To prepare its facilities for extreme temperatures during both summer and winter weather, Oncor has developed a robust list of weather preparation measures to help ensure its facilities are ready to serve during these times. Oncor conducts semi-annual seasonal preparation checks to prepare its facilities for summer and winter peaks. The main components of these comprehensive measures are summarized below:

- Aerial or ground-based inspection of 345 kV lines for encroachments or right-ofway issues with respect to loading/sagging;
- Inspection and testing of selected protection systems;
- Infrared inspections of stations;
- Switching station and substation checks of control houses, transformers/autotransformers, circuit breakers, general station equipment, and related facilities;
- Application of special inspection scrutiny for critical facilities and those subject to potential contingency overload or near-overload conditions based on projected weather;
- Inspections of station capacitor readiness;
- Inspections of mobile substation readiness;
- Other facility checks to ensure appropriate levels of necessary items and coverage, such as antifreeze levels, exposed plumbing insulation, etc.;
- Emergency generator checks to gauge adequacy of fuel and functionality in expected weather conditions;
- Mobile equipment checks to gauge adequacy of fuel and functionality in expected weather conditions;
- Transportation/vehicular checks to gauge adequacy of fuel and functionality in expected weather conditions; and
- Personnel and personal protective equipment (PPE) checks for employee safety.

In addition to annual seasonal preparedness inspections, Oncor has engaged in numerous efforts to further enhance operational readiness during extreme weather conditions by evaluation

of operational risks and asset conditions. These efforts include capital improvement projects such as high voltage circuit breaker and switch replacements, switch gear circuit breaker retro-fits, transformer bushing and arrestor replacements, and improved monitoring capabilities by way of temperature and dissolved gas analysis monitor installations. Oncor also performs a number of on-demand preventative maintenance activities such as additional transmission line inspections in high loading and heavy vegetation-prone corridors, equipment overhauls (*e.g.*, switchgear), component replacements like transformer fans/pumps, and inspection and diagnostic testing of equipment in locations with limited to no back-stand capabilities. Facility design and siting also influence extreme weather preparedness. For example, Oncor locates certain important facilities, such as sensitive components of static synchronous compensators, "FACTS" devices, and static var compensators, inside station houses to reduce potential weather impacts.

#### 6. Annexes

The annexes required by 16 TAC § 25.53(e) that are applicable to Oncor are attached to this Oncor PUC EOP as Annexes A through G. Oncor has not included a hurricane annex as required by 16 TAC § 25.53(e)(1)(E) because no Oncor facilities are located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management.

# 7. Revision Control Summary

Revision Number	Approved Date	Description of Changes	Approval
0	4/8/22	Original	[Signature] Manager, Mutual Assistance and Emergency Preparedness As of the Approved Date, this revised Oncor
			PUC EOP supersedes previous Oncor PUC EOPs.
1	6/22/22	Clarification to wildfire annex	[Signature] Manager, Mutual Assistance and Emergency Preparedness
			As of the Approved Date, this revised Oncor PUC EOP supersedes previous Oncor PUC EOPs.
			[Signature]
			Manager, Mutual Assistance and Emergency Preparedness
			As of the Approved Date, this revised Oncor PUC EOP supersedes previous Oncor PUC EOPs.
			[Signature]
			[Signature] Manager, Mutual Assistance and Emergency Preparedness
			As of the Approved Date, this revised Oncor PUC EOP supersedes previous Oncor PUC EOPs.

# Annex A To Oncor Electric Delivery Company LLC's <u>Public Utility Commission of Texas Emergency Operations Plan</u>

# Weather Emergency Annex

Oncor's response to a cold or hot weather emergency is based on the activities described below, as well as the communications activities described in Section 2 of the Oncor PUC EOP.

# 1. Plan for Staffing During Cold or Hot Weather Emergency

Oncor's real-time operations are managed 24 hours a day, seven days a week by two Distribution Operations Centers ("DOCs") and one Transmission Grid Operations facility ("TGO"). During cold or hot weather emergencies, the 24/7 staffing of the DOCs, TGO, and Customer Contact Centers is enhanced and coordinated by the System Emergency Center ("SEC"). The operations personnel who staff the DOCs and TGO are trained annually to respond to and address different emergency conditions, including cold and hot weather emergencies. Oncor's SEC is also staffed and utilized when the size of an emergency dictates centralized command and communications. The employees at the DOCs, TGO, and SEC include transmission and distribution operations personnel, supervisors, and management-level employees, many of whom have received National Incident Management System ("NIMS") and other emergency preparedness training. Section 4 of this Oncor PUC EOP describes Oncor's plan for staffing during emergencies, including both cold and hot weather emergencies.

# 2. Plan for Monitoring the Weather

Section 5 of this Oncor PUC EOP describes Oncor's weather monitoring. The actions described in Section 5 of this Oncor PUC EOP are used throughout the year and are used for both cold and hot weather emergencies.

# 3. Checklists for Use During Cold Weather or Hot Weather Emergency

The checklist below is for use by transmission or distribution facility personnel during cold or hot weather emergency response and includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

# Personnel Protective Equipment:

- Is there sufficient personnel protective equipment available for restoration crews?
- Do restoration crews have plenty of water?
- Do restoration crews have established work plans?

- Layer clothes for warmth and wear boots.
- Consider adding extra clothes to the vehicle (e.g., double gloves, hooded jacket, extra socks, hat, sweater, etc.).

# Transportation:

- Prepare employees for driving in severe conditions and develop contingency plans for being stranded in the elements.
- Review contents of emergency car kits to ensure adequate supplies in the event of a vehicle incident during freezing or peak summer conditions.
- Clear all windshields of ice and snow to create maximum visibility before driving.

# Food and Lodging:

- Has adequate lodging been secured for work location employees or those reporting to work locations from out of town?
- Do all workers have access to meals?

# *Transmission System – General:*

- Restore on-going construction and maintenance outages as instructed by ERCOT.
- Planned construction and maintenance outages will be cancelled or delayed depending on weather conditions and ERCOT instructions.

# *Distribution System – General:*

- Ensure all feeders in the normal configuration and necessary repairs are made.
- Review planned maintenance for possible cancellation.
- Switch all URD loops to normal configuration.
- Ensure all seasonal switching is accomplished.
- Review contingency plan for any winter projects not completed.

# Equipment:

- Ensure transformer inventory is adequate.
- Ensure fuse inventory is adequate.

# Supply Chain:

- Monitor material and storm stock.
- Monitor transformer inventory in each yard.
- Contact material suppliers regarding availability if needed.
- Monitor fuel tanks at each service center and update delivery schedules.
- Monitor inventory of pole mounted jumbo step transformer.
- Monitor availability of contract haulers and crane operators.
- Monitor and update on-call employee list.

# **Business** Operations

- Alert Oncor's Relationship Management Town Managers throughout the system.
- Confirm availability of personnel—update employee contact information.

- Managers to confirm working location and make proper accommodations for a safe working/rest environment approved by Director/Upper Management.
- Shift work and safe work location to be assigned to support staff.
- If Managers are working offsite/non-Oncor facility Verify work stations are working properly and report any malfunctions to be addressed immediately.
- Managers to verify proper contact information for internal key stakeholders (information kept internally).
- Managers to receive approved media releases prior to releasing any media statements/pertinent information to the public.
- Managers to contact upper management and Oncor Communications if approached by outside media for information.
- Managers to ensure key external stakeholders have necessary contact information for relevant Oncor resources including Managers own contact information.

# Customer & Community Engagement

- Contact Center schedule additional shift staffing and monitor staffing needs throughout event.
- Outage Channels notify vendors of possible surge in text/IVR volumes and monitor volumes throughout event.
- Prepare banner messaging for outage map monitor and update banner messaging as needed throughout event.
- Social Media Channels prepare for additional monitoring support monitor monitoring support and adjust as needed throughout event.
- Corporate Communications prepare media updates and key messaging throughout event.
- Area Managers are updated and prepared to communicate key messaging throughout event.
- LCI Account Managers are updated and prepared to communicate key messaging throughout event.

## Annex B To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

## **Load Shed Annex**

#### I. Procedures for Controlled Shedding of Load

An Energy Emergency Alert ("EEA") event is a condition when there is not enough generation capacity to meet the load demand and maintain the required reserve margin. ERCOT is responsible for monitoring system conditions, initiating EEA levels, notifying Qualified Scheduling Entities ("QSEs") and Transmission Service Providers ("TSPs"), and coordinating actions to resolve the condition. Oncor's Transmission Grid Operations group ("TGO") will adhere to ERCOT's instructions as described in ERCOT Nodal Operating Guide Section 4.5.

During an EEA event, ERCOT will communicate operating instructions to TGO. TGO will then issue operating instructions to Oncor's Distribution Operations Centers ("DOCs"). DOC Operators on duty have the responsibility and the authority to carry out the necessary load shed actions as instructed by TGO.

Oncor's obligation during short supply emergencies that require the shedding of firm load is to support ERCOT in maintaining system integrity and equitably distribute the impact to customers while considering the impact to critical and emergency loads. Further, Oncor's load shedding plan is based on an understanding of the type of customers that it serves, the need to have a highly available load shedding program, and the importance of applying the Company's load shedding program consistently across its service territory.

In addition to EEA events, other situations which would typically be driven by local area voltage conditions or facility loading limitations could arise that result in the need to shed a small or localized load. In those more limited situations, not all of the steps described in this Annex may be needed or even possible. In those circumstances, Oncor will work with ERCOT to perform the load shed in a manner generally consistent with the steps described in this Annex to the extent they are applicable to the situation.

All feeders on the Oncor electric system are analyzed at least two times a year to determine the types of customers it serves. The results of this analysis are included in the twice annual update of Oncor's load shed plan and corresponding load shed feeder list (the "List"). The different types of customers on the Oncor System are Residential, Commercial, and Industrial. Further, customers may be designated as Critical or Emergency. Critical Customers are classified using the definitions in 16 Tex. Admin. Code ("TAC") § 25.497(a)(1)-(4) and § 25.52(c)(2). These designations do not equate to an exemption from load shed, as virtually all Oncor feeders serve such customers.

Certain Critical Customers whose service is critical to the public health and welfare of the citizens of the community during an emergency or those whose service provides major support to the integrity of the electric system during an emergency are prioritized during load shed events. Consistent with ERCOT guidelines, in the event of a national or local emergency, and in the public's interest, service to other customers can be interrupted to provide necessary service to these Customers. This does not guarantee uninterrupted service for Customers during an emergency but only a priority of service.

While Oncor continues to maintain separation between manual load shed feeders and under frequency load shed feeders, Oncor has modified its processes to allow operators to incorporate a portion of the under frequency feeder load into the load shed process when system conditions allow, which would distribute the burden of a significant load shed event across more customers. Oncor worked with ERCOT and other stakeholders to allow TDUs to use this process.

# A. Media Appeal

In the event that ERCOT makes a Media Appeal for voluntary energy conservation, TGO will initiate the following Media Appeal and In-house Load reduction steps:

- 1. Notifies Incident Commander that voluntary load reduction is in effect.
- 2. Notifies SEC Operations Section Chief and On-Call Media Representative that ERCOT is making Media Appeals for customers' voluntary energy conservation. Oncor's communications team will share ERCOT's conservation messages and echo their appeal across its social media channels, Oncor.com and brand journalism site, The Wire. In the event ERCOT issues an EEA level media or public alert, Oncor will share these levels and actions as referenced in Sections 2.3 and 2.4 of the PUC EOP.
- 3. Makes Emergency Mass Notification System ("EMNS") notification to designated Oncor personnel that ERCOT has issued an ERCOT-wide Media Appeal through the public news media for voluntary energy conservation.
- 4. Directs TG Controllers to notify Region Transmission Operations that voluntary load reduction is in effect.
- 5. Notifies DOCs that voluntary load reduction is in effect.

# **B.** Operating Condition Notice

When time permits, ERCOT will issue an Operating Conditions Notice before issuing an Advisory, Watch or Emergency Notice. This notice indicates that some attention to the changing conditions may be warranted. ERCOT may issue an Advance Action Notice in anticipation of a possible Emergency Condition that identifies actions ERCOT expects to take to address the possible Emergency Condition if it is not otherwise alleviated by QSE or TSP actions.

# C. Advisory

ERCOT will issue an Advisory when Physical Responsive Capability ("PRC") falls below 3000 MW. If ERCOT expects conditions to deteriorate to EEA Level 2 or 3, then ERCOT will determine if any of the identified options can be used to increase transmission capacity.

When ERCOT issues an Advisory emergency notification, the Shift Manager takes the following actions:

- 1. Makes EMNS notification to designated Oncor personnel when ERCOT is experiencing transmission problems and/or PRC less than 3000 MW; and
- 2. Reconfigures Oncor System elements as instructed by ERCOT.

# D. Watch

ERCOT will issue a Watch when PRC falls below 2500 MW. When ERCOT issues a Watch, the Shift Manager takes the following actions:

- 1. Makes EMNS notification to designated Oncor personnel when ERCOT is experiencing transmission problems and/or PRC less than 2500 MW; and
- 2. Reconfigures Oncor System elements as instructed by ERCOT.

# E. Emergency Notice

When ERCOT issues an Emergency Notice, the Shift Manager takes the following actions:

- 1. Makes EMNS notification to designated Oncor personnel when ERCOT requires immediate action due to an expected EEA event.
- 2. Notifies Region Transmission Operations.
- 3. Requests field personnel to cease maintenance, recall outages and reconfigure the transmission system as instructed by ERCOT.
- 4. Updates outage times in the ERCOT Outage Scheduler for outages returned to normal.

- 5. Calls out additional support or control room personnel as necessary.
- 6. Notifies TMS personnel to cease any activity that could jeopardize TMS reliability and prepare staffing to give immediate support.

# F. EEA Level 1

ERCOT will declare an EEA Level 1 when PRC falls below 2300 MW and is not projected

to be recovered above 2300 MW within 30 minutes without mitigating action.

When ERCOT declares an EEA Level 1, the Shift Manager takes the following actions:

- 1. Notifies DOCs using three-part communication that Level 1 is in effect.
- 2. Directs TG Controllers to notify Region Transmission Operations that Level 1 is in effect according to the Region EEA Notification List. If necessary, requests Transmission Grid Operations Support to assist in Region notification.
- 3. Requests all transmission maintenance to cease that could aggravate conditions or impair grid availability.
- 4. Sends EEA Level 1 notification to designated Oncor personnel using EMNS system.
- 5. Notifies Oncor's Incident Commander that Level 1 is in effect.
- 6. Notifies TMS group "hands off" on anything that could jeopardize TMS reliability and prepare staffing for immediate support.
- 7. As requested by ERCOT, review the risk (*e.g.*, weather, fire, recent operations and known maintenance issues) to specific double-circuit contingencies identified by ERCOT as limiting generation to determine if it is acceptable to allow ERCOT to only operate to the associated single-circuit contingencies.

# G. EEA Level 2

ERCOT may declare an EEA Level 2 when clock-minute average frequency falls below

59.91 HZ for 15 consecutive minutes. ERCOT will declare an EEA Level 2 when PRC falls below

1750 MW and it is not projected to be recovered above 1750 MW within 30 minutes.

When ERCOT declares EEA Level 2, the Shift Manager takes the following actions:

- 1. Notifies DOCs that Level 2 is in effect.
- 2. Directs TG Controllers to notify Region Transmission Operations that Level 2 is in effect according to the Region EEA Notification List. If necessary, request TGO Support to assist in Region notification.

- 3. Sends EEA Level 2 notification to designated Oncor personnel using EMNS system.
- 4. Notifies Incident Commander that Level 2 is in effect.
- 5. TGO will notify the SEC if ERCOT has made a public media appeal.
- 6. Implement Voltage Reduction and CLM and Media Appeal, as instructed by ERCOT. Voltage Reduction may already be in progress due to prior ERCOT instruction in preparation for EEA Level 1.
- 7. If a contingency is identified in ERCOT's RTCA, at their discretion, ERCOT may operate the constrained transmission circuits to their 15-Minute Ratings.
- 8. If Oncor has agreed to allow ERCOT to stop operating to specific double-circuit contingencies, TGO will monitor those double-circuit facilities and report back to ERCOT if they become high risk (*e.g.*, weather, fire, recent operations).

# H. EEA Level 3

ERCOT may declare an EEA Level 3 when clock-minute average frequency falls below

59.91 HZ for 20 consecutive minutes. ERCOT will declare an EEA Level 3 when PRC falls below

1430 MW or when clock-minute average frequency falls below 59.91 HZ for 25 consecutive

minutes. ERCOT will make a hotline call to notify Oncor that EEA3 is in effect.

When ERCOT declares EEA Level 3, the Shift Manager takes the following actions:

- 1. Notifies EDOC and WDOC that ERCOT has issued an EEA Level 3. No actions required unless further instruction received from ERCOT. Prepare for potential load shed.
- 2. Directs TG Controllers to notify Region Transmission Operations that Level 3 is in effect according to the Region EEA Notification List. If necessary, request TGO Support to assist in Region notification.
- 3. Sends EEA Level 3 notification to designated Oncor personnel using EMNS system.
- 4. Notifies Incident Commander that Level 3 is in effect. TGO Management will initiate additional notifications, as necessary.
- 5. If a contingency is identified in ERCOT's RTCA, at their discretion, ERCOT may operate the constrained transmission circuits to their 15-Minute Ratings.
- 6. If Oncor has agreed to allow ERCOT to stop operating to specific double-circuit contingencies, TGO will monitor those double-circuit facilities and report back to ERCOT if they become high risk (*e.g.*, weather, fire, recent operations).

7. DOCs will continue making preparations to implement load shed. This may include confirming that the designated feeders on the load shed lists are properly configured to ensure service to emergency customers.

# I. ERCOT Declares Load Shed

ERCOT will direct load shed when PRC falls below 1000 MW and is not projected to be recovered above 1000 MW within 30 minutes, or when clock-minute frequency falls below 59.91 HZ for 25 consecutive minutes. ERCOT will make a second hotline call to notify Oncor to shed firm load, if immediate load shed was not instructed earlier.

When ERCOT instructs load shed due to PRC falling below 1000 MW, or instructs Oncor to shed additional load during an EEA Level 3, the Shift Manager:

- 1. Initiates calls with the East DOC and the West DOC using the Emergency Phone line to instruct load shed.
  - a. Each DOC Region (shown as Control Areas in the TMS) to shed their share of requested load using the table in the Ready Reference. DOCs initiate rotational load shed.
  - b. After initiating load shed, DOCs will immediately confirm that the designated feeders on the load shed lists are configured properly to ensure service to emergency customers. Load shed will be completed without delay and in a time period not to exceed 30 minutes of ERCOT's instruction.
  - c. DOCs will immediately inform TGO when load shed has been completed and the amount.
- 2. Notifies ERCOT of total amount of load that has been shed and time it was shed.
  - a. DOCs will rotate the shed load every 15-30 minutes, as system conditions allow, assuring that the minimum requested amount of shed load is maintained.
- 3. Notifies Incident Commander that Level 3 load shed is in effect. TGO Management will initiate additional notifications, as necessary.
- 4. Directs TG Controllers to notify Region Transmission Operations that EEA Level 3 load shed is in effect. If necessary, request TGO Support to assist in Region notification.
- 5. Sends EEA Level 3 load shed notification to designated Oncor personnel using EMNS system.

# J. Sustained Load Shed and Rotation

Subsequent load shed instructions from ERCOT will be implemented without delay. While Oncor is maintaining load shed as instructed by ERCOT, in certain situations, Oncor may include UFLS feeders in outage rotations, while continuing to meet its UFLS obligation. This approach will increase the amount of load available for rotating outages, spread the burden of those outages over a larger and more diverse pool, and provide added operational flexibility.

During restoration, priority will be given to UFLS feeders that were included in the feeder rotation.

# K. EEA Returning to Normal Operations

When ERCOT issues an Operating Instruction for a partial or total restoration of load, the Shift Manager will take the following actions:

- 1. Initiates calls with the East DOC and the West DOC using the Emergency Phone line to instruct load restoration.
- 2. Notifies ERCOT of total amount that was restored and time it was restored.
- 3. Notifies Incident Commander of the partial or total restoration. TGO Management will initiate additional notifications, as necessary.
- 4. Directs TG Controllers to notify Region Transmission Operations of the partial or total restoration. If necessary, request TGO Support to assist in Region notification.
- 5. Sends the partial or total restoration notification to designated Oncor personnel using EMNS system.
- 6. When EEA Level 3 is terminated:
  - a. Send EMNS notification to designated Oncor personnel.
  - b. Notify DOCs.
  - c. Notify Incident Commander.
  - d. Notify Region Transmission Operations.
- 7. When EEA Level 2 is terminated:
  - a. Restore voltage reduction to normal operation.

- b. Verify all voltages on Voltage Reduction Displays have returned to acceptable limits.
- c. Notify CLM manager that CLM can be restored.
- d. If Media Appeal was terminated by ERCOT, notify Incident Commander.
- e. Send EMNS notification to designated Oncor personnel.
- f. Notify DOCs.
- g. Notify Incident Commander.
- h. Notify Region Transmission Operations.
- 8. When EEA Level 1 is terminated:
  - a. Send EMNS notification to designated Oncor personnel.
  - b. Notify DOCs.
  - c. Notify Incident Commander.
  - d. Notify Region Transmission Operations.

# **II.** Priorities for Restoring Shed Load to Service

The following service restoration priorities will be maintained regardless of the severity of the event: (1) public and company safety, (2) Critical Customers, and (3) largest groups of customers first (*i.e.*, transmission lines, substations, feeders, laterals, busses, and individuals). Special conditions arising from the event pertaining to service interruptions that have the potential for life-threatening or hazardous consequences will be given priority status if expedited restoration at the location is practical. If UFLS feeders are included in load shed, then they will be given appropriate restoration priority to ensure that UFLS obligations are met.

Section 6 of the ERCOT Protocols and Section 4 of the ERCOT Nodal Operating Guides require Oncor to be prepared to respond effectively to a total blackout in ERCOT. Due to the lack of interconnections between ERCOT and other control areas, ERCOT must maintain its integrity with ERCOT generation resources and the limited power available through DC ties to other systems. In the event of a total blackout of the ERCOT system, ERCOT relies on Black Start Resources that are able to startup with no external electric power source. Careful coordination is

required between ERCOT, Transmission Operators, Black Start Resources and other generation facilities that are brought online during restoration to balance load and generating capability while maintaining an acceptable system frequency. Generally, each Black Start Resource will be used to start a Next Start Resource via a pre-defined Cranking Path and then form a stable island. Islands will be tied together via pre-defined Synchronization Corridors to ultimately restore the ERCOT interconnection. Initial load restoration is primarily to stabilize the Black Start Resources, Next Start Resources and any other generators that are brought online in the island. Load will be restored along the pre-defined Synchronization Corridors as needed to maintain appropriate voltage levels and reactive reserves.

Facilities that are considered critical, and thus prioritized during restoration, are as follows: (1) provide off-site power to Comanche Peak Nuclear Power Plant, (2) provide critical power to as many power plants as possible to prevent equipment damage, (3) secure or provide startup power for generating plants that do not have black start capability, (4) provide power to critical natural gas facilities that are needed to maintain natural gas flows to power plants, and (5) supply station service to critical substations such as stations that serve control centers critical to restoration. Additional critical loads that are prioritized during restoration are as follows: (1) military facilities, (2) facilities necessary to restore the electric utility system, (3) law enforcement organizations and facilities affecting public health, and (4) public communication facilities.

# III. Procedure for maintaining an accurate registry of critical load customers, as defined under 16 TAC § 25.5(22), § 25.52(c)(1) & (2), and § 25.497, and TWC § 13.1396, directly served, if maintained by the entity.

Oncor designates critical load customers using the definitions in 16 TAC § 25.497(a)(1)-(4), which describe four types of critical load customers: Critical Load Public Safety Customer, Critical Load Industrial Customer, Chronic Condition Residential Customer, and Critical Care Residential Customer. Additionally, 16 TAC § 25.52(c)(2) defines a Critical natural gas facility. For the purposes of this document, the term "critical load customer" shall include all five customer types.

#### A. Identification of Eligible Customers

To ensure that Oncor maintains an accurate registry of critical load customers, Oncor strives to ensure that all eligible customers have been identified. Paragraphs 1 and 2 below identify the processes that customers can use to apply for critical load customer status.

#### 1. Residential Customer Identification

Oncor identifies Chronic Condition Residential Customers and Critical Care Residential Customers through a customer-initiated application process in accordance with the procedure described in 16 TAC § 25.497(e). A physician, on behalf of the residential applicant, must submit the PUC-approved application form to Oncor at the email address or fax number designated on the form.

After Oncor receives the form from a physician, Oncor's Contact Center Back Office Team evaluates the form for completeness. If the form is incomplete, no later than two business days after receiving the form, Oncor mails the form to the customer and explains in writing what information is needed to complete the form. Additionally, the customer shall be designated as a Critical Care Residential Customer or Chronic Condition Residential Customer on a 14-day temporary basis.

Oncor notifies the customer's retail electric provider ("REP") of such temporary designation using a standard market transaction. If the form is not returned by the customer within 14 days, the temporary designation expires, and the application process must start over.

Upon approval of an application, Oncor notifies the customer's REP using a standard market transaction and the customer of the final status of the application process, including whether the customer has been designated with a Critical Care Residential Customer or Chronic Condition Residential Customer status. Oncor also notifies the customer of the date a designation, if any, will expire, and whether the customer will receive a renewal notice.

Oncor mails a renewal notice to a Chronic Condition Residential Customer whose designation is for a period longer than 90 days or a Critical Care Residential Customer, at least 45 days prior to the expiration date of the customer's designation. The renewal notice is also mailed to the emergency contact included on the PUC-approved application form (if applicable). The renewal notice includes the application form and an explanation of how to reapply for Critical Care Residential Customer or Chronic Condition Residential Customer designation. The renewal notice

also informs the customer that the current designation will expire unless the application form is returned by the expiration date of the existing designation.

## 2. Non-residential Customer Identification

A non-residential customer, such as a commercial, industrial or municipal customer, may be eligible for designation as a Critical Load Public Safety Customer or Critical Load Industrial Customer. Oncor identifies Critical Load Public Safety Customers and Critical Load Industrial Customers through a customer-initiated application process. Customers may apply using Oncor's online Application for Critical Load Public Safety or Critical Load Industrial Customer (Non-Residential) Status. If customers have several premises for which to apply, they may request an application spreadsheet template from Oncor, and after completing it, submit it to the <u>CriticalLoad@oncor.com</u> mailbox.

An affected water and wastewater utility must annually submit the information required by Texas Water Code § 13.1396(c) to each electric utility that provides transmission and distribution service to the affected utility. To assist these affected utilities in fulfilling this requirement, Oncor performs an annual outreach, providing the affected utilities with the most current list of their critical facilities. As part of the outreach effort, Oncor requests that they acknowledge each facility is still critical or if the critical load designation should be removed, and if any new facilities need to be added.

In accordance with 16 TAC § 3.65, the operator of a critical natural gas facility must provide critical customer information to the utility from which the critical natural gas facility receives electric delivery service. This information is provided twice per year to the utility using RRC Form CI-D. Oncor works closely with the natural gas facility operators to facilitate these requirements.

Once a customer submits an application (which may be an online application, application spreadsheet template, water/wastewater utility outreach response or RRC Form CI-D), a member of Oncor's Market Solutions Team will review the application to determine if the application is complete and if the premise meets the definition of either a Critical Load Public Safety Customer, Critical natural gas facility, or Critical Load Industrial Customer.

After making a determination, Oncor notifies the REP of Record of the proposed decision giving them an opportunity for input. Oncor also emails the customer a letter informing them of the final determination. If Oncor approves the application, Oncor also notifies the customer's REP and ERCOT using a standard market transaction. If Oncor denies the request, the customer may appeal and Oncor's Critical Load Appeal Review Board will review the application and any supplemental information that was provided by the customer to render a final decision.

# **B.** Maintenance of Critical Load Registry

Once a customer's premise has been identified as a critical load customer as defined in 16 TAC § 25.497, that customer's account is coded with a critical load customer code that becomes part of that customer's account record within the Oncor Customer Care and Billing System ("CC&B"). CC&B serves as Oncor's registry of critical load customers. The critical load customer registry is updated on an ongoing basis in response to requests received and approved to assign or renew critical load designations for customers.

The critical load designation in the registry will be removed for Critical Care and Chronic Condition Residential Customers when the customer moves from the premise or when the designation expires without a renewal.

For Critical Load Public Safety, critical natural gas facilities or Critical Load Industrial Customers, the designation does not expire and will remain until additional information is received requiring modification or removal.

Oncor also provides REPs a convenient tool within Oncor's Competitive Retailer Information Portal that allows them to download a list of their respective critical load customers from the registry.

# C. Processes for Providing Assistance to Critical Load Customers in the Event of an Unplanned Outage

When a service interruption is reported or detected, the critical load customer identification is made from the customer account records and is associated to an outage event in the outage management system used by the Oncor DOCs to manage restoration activities. Critical load customers are prioritized for restoration of service consistent with the ERCOT Guidelines,<sup>1</sup> and the DOCs will pursue priority service restoration consistent with those Guidelines.<sup>2</sup> Section II of this Oncor PUC EOP describes Oncor's service restoration priorities.

<sup>&</sup>lt;sup>1</sup> ERCOT Nodal Operating Guides, Section 4.5.2(3).

<sup>&</sup>lt;sup>2</sup> Id.

# D. Process for Communicating with Critical Load Customers During an Emergency

In the event of an ERCOT EEA Level 2 or 3, a proactive message is sent to critical load customers notifying them of the Alert. In addition, a message is sent when the Alert has been canceled. Additional contact with critical load customers by Company personnel may be made to notify them regarding the approximate length and severity of an outage, or to confirm that service has been restored.

Communicating with critical load customers is considered part of Oncor's normal, daily business operation. Oncor provides critical load customers advanced notice, if reasonably possible, if Oncor must interrupt delivery service in the event of an emergency. Additionally, critical load customers may enroll in "My Oncor Alerts" or download the "MyOncor" App, which are described in Section 2.4 of this Oncor PUC EOP. Customers may also access Oncor's document titled, "Important Information About Electricity Load Shedding and What It Could Mean to You" on Oncor's website.

# E. Coordination with Government and Service Agencies as Necessary During an Emergency

# 1. Local Government and Service Agencies

Oncor's Customer Service Group is responsible for maintaining close communications with local government entities including municipalities, counties, and local divisions of the Texas Division of Emergency Management during load shed events. Area Managers within the Customer Service Group are available to participate at the emergency management centers of local jurisdictions either virtually or in-person. Area Managers are responsive to requests to maintain power at service agencies such a warming centers during these events. In the event of an ERCOT EEA level 2 or 3, a proactive message is sent to municipal contacts notifying them of the Alert. In addition, periodic updates are provided and a proactive message is sent when the Alert has been canceled. Additionally, Oncor may participate in local emergency drills as requested.

# 2. State Government and Service Agencies

Oncor's Regulatory Affairs Group is responsible for maintaining close communications with the PUC in the event of a load shed event. As described in Section 2.5 of this Oncor PUC EOP, that group's communications with the PUC generally involve providing accurate and timely information during and after a load shed occurs. The Regulatory Affairs group is also responsible

for timely responding to any PUC requests for information concerning a load shed event. Oncor's Regulatory Affairs Group also participates in external discussions with entities such as the Texas Division of Emergency Management and Texas Energy Reliability Council, as requested.

Throughout a load shed event, the Regulatory Affairs Group will respond to any PUC inquiries and requests, including dispatching an Oncor representative to the Texas Department of Emergency Management State Operations Center when requested where Oncor personnel may interact and respond to a broad array of state agencies that may include representatives of service agencies. Additionally, Oncor may participate in ERCOT, PUC, or other state emergency drills as requested.

# F. Training

The processes for maintaining an accurate registry of critical load customers are addressed in Oncor's work instructions, process flow diagrams, and training materials for employees who engage with those customers. Oncor employees who have responsibilities related to critical load customers receive training, which includes on-the-job training related to those responsibilities.

## Annex C To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

### **Pandemic and Epidemic Annex**

Oncor's response strategy for a pandemic and an epidemic is based on a two-part goal: (1) minimize disease transmission; and (2) sustain essential services. This strategy will guide the response at each Oncor site and of all Oncor employees. It begins with immediate readiness actions that should be taken before a North American outbreak occurs so Oncor will be able to take the remaining mitigation steps required in what may be days or weeks from first outbreak to widespread pandemic or epidemic conditions.

# Incident Command System

Given that Oncor operates facilities in counties throughout Texas, Oncor uses an Incident Command System that is designed to have the operational flexibility necessary to accommodate the needs of Oncor's different sites. Incident Command will provide overall direction to Oncor's various sites and will transmit site-specific pandemic or epidemic impact information through nine discrete response groups.

Members of Oncor's pandemic/epidemic response team will monitor news reports, the CDC portal, the WHO web site, and local medical resources (including the Dallas County Medical Authority) for the first sign of a threat in North America and will report any sign of emergence to the Oncor Incident Commander ("IC").

#### **Response Steps**

There are six planned steps of Oncor's response:

- Ready (outbreak hasn't started),
- Start (outbreak started/no virulence),
- Step 1 Mild (low virulence/no local outbreaks),
- Step 2 Mild (low virulence/local outbreaks),
- Step 1 Severe (high virulence/no local outbreaks), and
- Step 2 Severe (high virulence/local outbreaks.)

### **Response Groups**

When the Oncor IC decides to trigger a shift from the Ready step to Start, actions will be taken by the identified nine discrete response groups described below to position Oncor for a shift into either high virulence steps or low virulence steps based on findings released by the WHO and/or CDC. The nine response groups include: Communication, Supplies, Vendors, Redeployment, Security, Government and Stakeholders, Employee Support, Sanitizing, and Travel. The responsibilities of each response group are listed in the following table:

Response Group	Responsibilities		
Communication	• Write and communicate Oncor's responses to media queries and messaging to employees and contractors.		
Supplies	<ul> <li>Source and replenish pandemic/epidemic supplies.</li> <li>Deliver prevention supplies to all sites.</li> </ul>		
Vendors	• Work with vendors/suppliers to ensure that they are ready for a pandemic/epidemic and that they know the Oncor pandemic/epidemic plan.		
Redeployment	<ul> <li>Make sure mission critical jobs are filled.</li> <li>Move furniture to implement social distancing &amp; making other physical plant changes.</li> </ul>		
Security	• Support "No Visitor" policy and symptomatic employee entrance denial.		
Government & Stakeholders	<ul> <li>Coordinate and communicate with state and local public health agencies.</li> <li>Coordinate and communicate with states and federal regulators.</li> </ul>		
Employee Support	<ul> <li>Manage system for virus/illness reporting and for communicating benefits to employees and families.</li> <li>Operate Hotline/Fit for Duty phone line for people to call in sick.</li> </ul>		
Sanitizing	<ul> <li>Manage increase/intensified facilities cleaning</li> <li>Write facilities cleaning standards/training for all.</li> <li>Trigger increased cleaning procedures to ensure Company standard is met.</li> </ul>		
Travel	• Manage travel office so travel guidelines and restrictions are enforced.		

Once the WHO and/or the CDC announces their virulence findings for the threat and the IC has made a determination to move into Step 1 of either the Mild or the Severe pandemic/epidemic response path, pandemic/epidemic response groups will implement their

checklist of tactics accordingly. The decision to shift from Step 1 to Step 2 could happen unilaterally if the outbreak is rapid and widespread. But if, due to the Company's large geographic footprint, the number of confirmed cases varies from location to location, Oncor site managers will have the latitude to shift steps at affected sites.

To transmit and deliver electricity to millions of Texas homes and businesses, experienced and highly trained Oncor employees and contractors must be able to use very specialized equipment and/or perform essential duties in specific rooms located in several Oncor facilities. Without access to these Mission Critical Locations or enough people to perform their essential duties in these rooms, our ability to serve our customers would be significantly compromised. So, the infection prevention actions described below will be implemented earlier and with greater rigor in Oncor's Mission Critical Locations.

# **Tactics**

The tactics to be used in each step are described below:

# Ready:

- Prevention materials are replenished as needed.
- Communications procedures are reviewed and revised.
- Re-deployment data is reviewed and updated.

# Start:

- Hygiene/flu avoidance messaging is posted.
- Technology for remote work is reviewed and enhanced.
- Supplies are pre-positioned.
- Vendors are contacted regarding pandemic/epidemic readiness.

# Step 1 Mild:

- Mission critical employees are briefed on special infection precautions.
- Regular communications begin with state and local agencies.
- Inventory Sanitization Supplies.
- Virus/illness-like symptom absence tracking begins.
- Common area sanitizing 4x daily.

# Step 2 Mild:

• Engage back up suppliers as needed when primary suppliers fall short.

- Distribute wipes, hand cleaners, etc. to mission critical employees (based on CDC's recommendations).
- Determine need to implement work from home procedures for non-critical employees, as appropriate.
- Common area sanitizing 6x daily.

# Step 1 Severe:

- Advise government key contacts of extraordinary actions required by pandemic/epidemic response.
- Enforce a 'No Visitor' policy at all Oncor facilities.
- Initiate Social Distancing procedures.

# Step 2 Severe:

- Track inventory of Oncor pandemic/epidemic supplies on a daily basis.
- Begin a high visibility virus/illness prevention campaign with employees and families.
- Restrict access to mission critical rooms.

### Annex D To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

#### Wildfire Annex

Oncor addresses its response to a wildfire emergency and its mitigation of the hazards of wildfire to its facilities below. Oncor's service territory covers a highly variable range of geographic, climatic, and vegetative regions encompassing 408 cities and 98 counties across Texas. Average annual precipitation in Oncor's service territory varies from under 14 inches in the western portions of the territory to 44 inches in the eastern portions of the territory. Vegetation ranges from desert shrub in the western portions of the territory to pine forests in the eastern portions of the territory.

#### Wildfire Warnings

The National Oceanic and Atmospheric Administration via the National Weather Service ("NWS") issues red flag warnings by county when the National Fire Danger Rating System identifies a high to extreme fire danger level, an average sustained wind speed of 15 mph or greater, and a relative humidity of less than or equal to 25%.

When a red flag warning has been issued for any part of Oncor's service territory, Oncor's grid operators and other appropriate personnel are alerted of the condition to increase awareness of the fire danger and ensure proper measures are taken to mitigate the risk of igniting a wildfire. Oncor also has an automated process that utilizes NWS broadcast warnings and incorporates them with enterprise data to allow Oncor to evaluate potential responses across its service territory. This analysis updates when new NWS information is available, which allows Oncor's operational teams to make decisions based on current conditions that will minimize fire hazards and mitigate exposure to the ignition and rapid spread of wildfires.

#### **Proactive Wildfire Mitigation Approach**

Oncor has a proactive wildfire mitigation approach for its distribution system. Through the implementation of its various proactive maintenance programs and through its reactive maintenance efforts, Oncor inspects various equipment on its distribution system. During that work, Oncor may identify and address equipment issues. While the purpose of those inspections is not to identify potential wildfire hazards, Oncor proactively addresses any wildfire hazards discovered during that work. Poles and other components in need of repair or replacement are

identified, and potential hazards are remediated. Oncor also has vegetation management practices in place to prune and remove vegetation away from its distribution facilities. In areas where there is an increased risk of damage to its facilities caused by tree failures, Oncor works to remove trees (including those off right-of-way) that are identified as a hazard.

Oncor also has a proactive wildfire mitigation approach for its transmission system. Oncor performs periodic facility inspections of its transmission facilities. Oncor proactively addresses transmission structures and other components in need of repair or replacement, and potential hazards, including wildfire hazards, discovered during those inspections are remediated. Oncor uses concrete or steel structures when constructing new transmission lines and routinely inspects existing wooden transmission structures to determine the need to replace them with concrete or steel structures. Oncor is systematically replacing wooden crossarms on existing transmission structures with upgraded steel crossarms. Oncor also prunes and removes vegetation away from its transmission facilities. In areas where there is increased risk of damage to its facilities caused by tree failures, Oncor works to remove trees (including those off right-of-way) that are identified as a hazard.

#### **Reactive Wildfire Mitigation Approach**

Oncor uses the Incident Command System for during active wildfires. On an annual basis, Oncor employees attend safety and information meetings to receive briefings on wildfire mitigation procedures. When necessary, fire teams may be created consisting of at least two personnel, a vehicle, a water tank, and a sprayer. The purpose of the fire teams is to protect Oncor facilities during a wildfire. When fighting fires, teams will attempt to get ahead of the fire to clear around poles and wet the poles to at least five feet high. Oncor's employees take precautions not to leave vehicles idling or traversing through tall grass or heavy debris areas when patrolling lines. They also take precautions to protect Oncor facilities to reduce the risk of igniting grass and debris with the vehicle's exhaust system. If the fire has already passed through an area, the team will wet/rewet all poles.

# Restoration of Power in an Active Wildfire Zone

In active wildfire zones, Oncor implements transmission and distribution procedures to minimize fire hazards when reclosing breakers or performing mainline switching in red flag warning areas. After completing a formal damage evaluation due to a wildfire event, Oncor will then follow its normal storm restoration process.

During a wildfire event, Transmission Grid Operations and/or Distribution Operations Center will coordinate and designate a primary point of contact to communicate with fire, police, and other stakeholders.

### Annex E To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

#### **Cyber Security Annex**

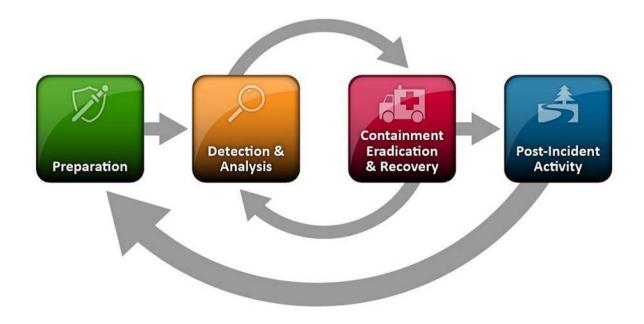
Pursuant to Oncor's policies and procedures, Oncor investigates any computer or network security event or incident within the Oncor computing environment, as well as any networks or entities that interface with the Oncor network. Oncor identifies and establishes roles and responsibilities for all parties involved, including Oncor Technology staff, other Oncor functions, and our External Partners.

Numerous teams are critical to the security of Oncor. The Oncor Digital Grid Management Security Operations Center ("DGM-SOC") is the lead for all cyber security incidents and events. Annual training and testing, of varying levels of intensity, will be conducted to ensure that the CSIRP remains relevant, specific, and viable in the protection of Oncor computing environments.

Oncor management and the Cyber Security Incident Response Team ("CSIRT") may modify incident response activities as needed to address emergency situations or respond appropriately to a particular Cyber Security Incident.

#### Incident Response Life Cycle

Shown below are the four phases of the "Incident Response Life Cycle" from the National Institute of Standards and Technology – U.S. Department of Commerce; *Computer Security Incident Handling Guide: Special Publications 800-61 Revision 2 (Draft) (Refer to Appendix H):* 



### Preparation

Although the incident response team is not typically responsible for incident prevention, it is fundamental to the success of incident response programs. Therefore, incident response methodologies typically emphasize preparation—not only establishing an incident response capability so that Oncor is ready to respond to incidents, but also preventing incidents by ensuring that systems, networks, and applications are sufficiently secure. Specific preparation activities are addressed in Enterprise Policies and are the responsibility of the Chief Information Security Officer.

# **Detection and Analysis**

For many organizations, the most challenging part of the incident response process is accurately detecting and assessing possible incidents—determining whether an incident has occurred and, if so, the type, extent, and magnitude of the problem. What makes this so challenging is a combination of three factors:

1. Incidents may be detected through many different means, with varying levels of detail and fidelity. Automated detection capabilities include network-based and host-based IPSs, antivirus software, protection applications and log correlation tools. Incidents may also be detected through manual means, such as problems reported by users. Some incidents have overt signs that can be easily detected, whereas others are almost impossible to detect.

- 2. The volume of potential signs of events is typically high—for example, it is not uncommon for an organization to receive thousands or even millions of intrusion detection sensor alerts per day.
- 3. Deep, specialized technical knowledge and experience are necessary for proper and efficient analysis of incident-related data.

# Containment, Eradication and Recovery

Containment is important before an incident overwhelms resources or increases damage. Most incidents require containment, so that is an important consideration early in the course of handling each incident. An essential part of containment is decision-making (e.g., shut down a system, disconnect it from a network, and disable certain functions). Such decisions are much easier to make if there are predetermined strategies and procedures for containing the incident. Oncor has defined acceptable risks in dealing with incidents and developed strategies accordingly.

Containment strategies vary based on the type of incident. For example, the strategy for containing an email-borne malware infection is quite different from that of a network-based DDoS attack. Oncor has containment strategies for each major incident type, with criteria documented clearly to facilitate decision-making. Criteria for determining the appropriate strategy include:

- Potential damage to and theft of resources;
- Need for evidence preservation;
- Service availability (e.g., network connectivity, services provided to external parties);
- Time and resources needed to implement the strategy;
- Effectiveness of the strategy (*e.g.*, partial containment, full containment);
- Duration of the solution (*e.g.*, emergency workaround to be removed in four hours, temporary workaround to be removed in two weeks, permanent solution).

# **Post-incident** Activities

One of the most important parts of incident response is also the most often omitted: learning and improving. Each incident response team should evolve to reflect new threats, improved technology, and lessons learned. Holding a "lessons learned" meeting with all involved parties after a major incident, and optionally periodically after lesser incidents as resources permit, can be extremely helpful in improving security measures and the incident handling process itself. Multiple incidents can be covered in a single lessons learned meeting. This meeting provides a chance to achieve closure with respect to an incident by reviewing what occurred, what was done to intervene, and how well intervention worked. The lessons learned meeting should be held within several days of the end of the incident. Questions to be answered in the meeting include:

- Exactly what happened, and at what times?
- How well did staff and management perform in dealing with the incident? Were the documented procedures followed? Were they adequate?
- What information was needed sooner?
- Were any steps or actions taken that might have inhibited the recovery?
- What would the staff and management do differently the next time a similar incident occurs?
- How could information sharing with other organizations have been improved?
- What corrective actions can prevent similar incidents in the future?
- What additional tools or resources are needed to detect, analyze, and mitigate future incidents?

# **Reporting and Communications**

Oncor is committed to following all legal and regulatory requirements for incidents determined to be reportable. The CSIRT will coordinate with Oncor's Leadership Team, Communications team, and Legal team in order to define roles accountable for alerting and coordinating with the appropriate entities and agencies such as the Cybersecurity and Infrastructure Security Agency, E-ISAC, and the Federal Bureau of Investigation as required.

### Annex F To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

### **Physical Security Incident Annex**

Oncor complies with applicable requirements for reporting physical security incidents, including requirements established by the U.S. Department of Energy, the Federal Energy Regulatory Commission, the North American Electric Reliability Corporation, the Electric Reliability Council of Texas, and the Public Utility Commission of Texas. Oncor maintains relationships with various local, state, and federal level departments and agencies to ensure proper notifications are executed during security threat events and has established processes and procedures to ensure that physical security incidents are appropriately reported and resolved.

Oncor manages and maintains its access control systems, physical security monitoring systems, applicable procedures, and related processes. Oncor relies on a combination of patrols, visual monitoring, remote sensing capabilities, operational tools, and other security practices to identify and respond to potential physical security incidents.

When notified that there has been a physical security threat to an Oncor transmission facility, the Transmission Grid Operations Shift Manager would confirm what level of event it was based on the definitions contained in the applicable procedure. The Shift Manager then notifies the applicable district personnel, ERCOT, Oncor management, Oncor's corporate security, and other transmission operators as needed. The Shift Manager must also complete Oncor's Physical Threat, Cyber Event, and Vandalism Reporting Form.

When notified that there has been a physical security threat to an Oncor distribution facility, the Distribution Operations Center Shift Manager would identify what type of event it was and notify the applicable district personnel, Oncor management, and Oncor's corporate security.

Depending on the type of event and information known, in most cases, command will be delegated to Oncor's Corporate Security, Integrated Operating Center, or Transmission Grid Operations. The Incident Commander will enact the appropriate section to assist in the response by evaluating the threat risk, addressing any immediate safety or reliability concerns, determining the appropriate response to the security threat, and communicating to other organizations and entities.

### Annex G To Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

#### Plan for Use of Facilities under PURA § 39.918(b)(1) or (2)

As of September 1, 2021, based on the enactment of Texas House Bill 2483 in 2021, a transmission and distribution utility may lease or own, as well as operate, facilities that provide temporary, emergency electric energy to aid in restoration of service to its own distribution customers during a widespread outage. A widespread outage is defined in Texas House Bill 2483 as "an event that results in (1) a loss of electric power that: (A) affects a significant number of distribution customers of a transmission and distribution utility; and (B) has lasted or is expected to last for at least eight hours; and (2) a risk to public safety."

As of April 8, 2022, Oncor is leasing 15 mobile generation units with a total capacity equivalent to approximately 11 MW for use as an electrical backup in the event of a widespread outage meeting the criteria of HB 2483. Oncor has strategically positioned these mobile generation units across its service territory. The primary use cases for these mobile generation units include, but are not limited to, the following: government agencies, fire departments, police departments, 911 call centers, hospitals, emergency shelters / warming facilities, and water treatment facilities.

Operational guidelines are in place to ensure the seamless installation of mobile generation units and the safety of Oncor personnel, contractors, and the general public. Oncor personnel and local contract crews have been trained in the deployment and operational characteristics of the mobile generation units.

In addition, each unit is maintained and tested on a regular basis. Units are also inspected to ensure deployment readiness in advance of weather and other events that are forecasted to impact the Oncor system.

Finally, Oncor has made strategic arrangements with construction service contractors and fuel providers to ensure the reliable operation of mobile generation units once deployed for service restoration.

This Plan for Use of Facilities under PURA § 39.918(b)(1) or (2) may be revised to address and comply with regulatory requirements that are established after the date this Plan is filed.

# **PROJECT NO. 53385**

PROJECT TO SUBMIT EMERGENCY	§	<b>BEFORE THE</b>
<b>OPERATIONS PLANS AND RELATED</b>	§	PUBLIC UTILITY
DOCUMENTS UNDER 16 TAC § 25.53	§	COMMISSION OF TEXAS

# **Executive Summary of Oncor Electric Delivery Company LLC's** Amended Public Utility Commission of Texas Emergency Operations Plan Pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i) June 24, 2022

# **TABLE OF CONTENTS**

I.	16 TAC § 25.53(d)(1) – Approval and Implementation Section
	A. 16 TAC § 25.53(d)(1)(A)
	B. 16 TAC § 25.53(d)(1)(B)
	C. 16 TAC § 25.53(d)(1)(C)
	D. 16 TAC § 25.53(d)(1)(D)
	E. 16 TAC § 25.53(d)(1)(E)
II.	16 TAC § 25.53(d)(2)(A) – Communication Plan
	A. Section 2.1 Procedures for handling complaints during an emergency
	B. Section 2.2 Procedures for communicating with the public during an emergency4
	C. Section 2.3 Procedures for communicating with the media during an emergency4
	D. Section 2.4 Procedures for communicating with customers during an emergency4
	E. Section 2.5 Procedures for communicating with the PUCT during an emergency
	F. Section 2.6 Procedures for communicating with the Office of Public Utility Counsel during an emergency
	G. Section 2.7 Procedures for communicating with Local and State Governmental Entities, Officials, and Emergency Operations Center during an emergency
	H. Section 2.8 Procedures for communicating with the ERCOT during an emergency5
	I. Section 2.9 Procedures for communicating with Critical Load Customers directly served by Oncor
III.	16 TAC § 25.53(d)(3)–Plan to Maintain Pre-Identified Supplies for Emergency Response .6

IV.	16 TAC	§ 25.53(d)(4) – Plan to Address Staffing During an Emergency Response	6
V.		§ 25.53(d)(5) – Plan for Identification of Weather-Related Hazards and Proc EOP	
VI.	16 TAC	§ 25.53(d)(6) – Annexes	7
VII.	16 TAC	25.53(e)(1)(A) - (D) and $(F) - (H) - Annexes A through G$	7
	Annex A	- 16 TAC § 25.53(e)(1)(A) – Weather Emergency Annex	7
	Annex B	- 16 TAC § 25.53(e)(1)(B) – Load Shed Annex	7
	Annex C	c - 16 TAC § 25.53(e)(1)(C) – Pandemic and Epidemic Annex	9
	Annex D	<b>)</b> - 16 TAC § 25.53(e)(1)(D) – Wildfire Annex	9
	Annex E	- 16 TAC § 25.53(e)(1)(F) – Cyber Security Annex	10
	Annex F	- 16 TAC § 25.53(e)(1)(G) – Physical Security Incident Annex	10
		6 - 16 TAC § 25.53(e)(1)(H) – Plan for Use of Facilities under PURA (b)(1) or (2)	10
VIII.	16 TAC	§ 25.53(c)(1)(A)(i)(III) – Record of Distribution	10
IX.	16 TAC	§ 25.53(c)(1)(A)(i)(IV) – Affidavit	10
X.	16 TAC	§ 25.53(c)(4)(A), (B), & (C) – Filing Requirements	11
	A. 16 T	AC § 25.53(c)(4)(A)(i) and (ii)	11
	B. 16 T	AC § 25.53(c)(4)(B)	11
	C. 16 T	AC § 25.53(c)(4)(C)	11
Exhi	bit 1	Oncor Electric Delivery Company LLC's Record of Distribution of Public Commission of Texas Emergency Operations Plan Pursuant to 16 Tex. Adn Code § 25.53(c)(4)(A)	nin.
Exhi	bit 2	AFFIDAVIT OF ONCOR ELECTRIC DELIVERY COMPANY LLC Purs 16 Tex. Admin. Code §§ 25.53(c)(4)(C) and (c)(1)(A)(i)(IV)	

### PROJECT NO. 53385

# PROJECT TO SUBMIT EMERGENCY§BEFORE THEOPERATIONS PLANS AND RELATED§PUBLIC UTILITYDOCUMENTS UNDER 16 TAC § 25.53§COMMISSION OF TEXAS

# Executive Summary of Oncor Electric Delivery Company LLC's Amended Public Utility Commission of Texas Emergency Operations Plan <u>Pursuant to 16 Tex. Admin. Code § 25.53(c)(1)(A)(i)</u> June 24, 2022

COMES NOW Oncor Electric Delivery Company LLC ("Oncor") and files this Executive Summary pursuant to 16 Tex. Admin Code ("TAC") § 25.53(c)(1)(A)(i). This Executive Summary describes the contents and policies in Oncor's Amended Public Utility Commission of Texas ("PUC") Emergency Operations Plan ("Oncor PUC EOP") and includes references to specific sections and page numbers of Oncor's PUC EOP that correspond with the requirements of 16 Tex. Admin. Code ("TAC") § 25.53. This Executive Summary also includes the record of distribution of the Oncor PUC EOP required under 16 TAC § 25.53(c)(4)(A) and the affidavit required under 16 TAC § 25.53(c)(4)(C) as Attachments 1 and 2.

### I. 16 TAC § 25.53(d)(1) – Approval and Implementation Section

The requirements 16 TAC 25.53(d)(1) are addressed in Section 1 "Approval and Implementation" of the Oncor PUC EOP (pp. 3-4).

A. 16 TAC § 25.53(d)(1)(A) –Section 1.1 (pp. 3-4) of the Oncor PUC EOP states that it applies across Oncor's service area to Oncor-owned facilities and facilities Oncor operates on behalf of Oncor Electric Delivery Company NTU when there is an emergency on the transmission and distribution ("T&D") system.

**B.** 16 TAC § 25.53(d)(1)(B) – Section 1.1 (p. 4) of the Oncor PUC EOP provides that Oncor's manager of the Mutual Assistance and Emergency Preparedness group is responsible for maintaining and implementing the Oncor PUC EOP and is responsible for approving any revision to the Oncor PUC EOP.

C. 16 TAC § 25.53(d)(1)(C) – Section 7 (p. 19) of the Oncor PUC EOP contains a revision control summary that lists the date each change was made to the Oncor PUC EOP since its initial filing.

**D.** 16 TAC § 25.53(d)(1)(D) – Section 7 (p. 19) of the Oncor PUC EOP, which is the revision control summary, reflects that each time a revision to the Oncor PUC EOP is approved, there is a dated statement that the current Oncor PUC EOP supersedes previous Oncor PUC EOPs.

E. 16 TAC § 25.53(d)(1)(E) – Section 7 (p. 19) of the Oncor PUC EOP, which is the revision control summary, states the date the Oncor PUC EOP was most recently approved by Oncor.

# **II.** 16 TAC § 25.53(d)(2)(A) – Communication Plan

The requirements 16 TAC § 25.53(d)(2)(A) are addressed in Section 2 "Communication Plan" of the Oncor PUC EOP (pp. 4-13).

# A. Section 2.1 Procedures for handling complaints during an emergency (pp. 4-5).

During an emergency, Oncor customers may contact Oncor via telephone inquiry concerning a complaint. Oncor's telephone number for general inquiries is 888-313-6862. The telephone number to report a power outage is 888-313-4747, and that number is answered 24 hours a day. All complaints are escalated to an internal Customer Relations team to manage until resolved.

# **B.** Section 2.2 Procedures for communicating with the public during an emergency (pp. 5-6).

Oncor's communications organization provides accurate and timely communication to the public during an emergency through a number of communications channels, including Oncor's social media pages, which are monitored 24/7; Oncor's website, which provides banner messages, FAQs, Oncor's Storm Center Outage Map, and a 24/7 virtual assistant; direct alerts via text message, email, phone, or the "MyOncor" app; and Oncor's 24-hour call center.

# C. Section 2.3 Procedures for communicating with the media during an emergency (p. 6).

Oncor's communications with the media during an emergency are managed by Oncor's communications organization. That organization provides storm preparation, safety, and restoration information and other event updates to the news media through news releases or notifications, and through interviews of Oncor personnel conducted by individual news outlets.

**D.** Section 2.4 Procedures for communicating with customers during an emergency (pp. 6-9).

4

Oncor uses various channels to communicate directly with customers during an emergency, including social media, Oncor's website (Oncor.com), a text messaging program called "My Oncor Alerts," the "My Oncor" app, and the Oncor Call Center.

# E. Section 2.5 Procedures for communicating with the PUCT during an emergency (p. 9).

Oncor's Regulatory Affairs group is responsible for maintaining close communications with the PUCT in the event of an emergency and for providing accurate and timely information prior to, during, and after an emergency occurs. The group is also responsible for timely responding to any PUCT requests for information concerning an emergency.

# **F.** Section 2.6 Procedures for communicating with the Office of Public Utility Counsel ("OPUC") during an emergency (p. 10).

Oncor's Regulatory Affairs Group is responsible for maintaining close communications with OPUC in the event of an emergency and providing accurate and timely information prior to, during, and after an emergency occurs. The Group is also responsible for timely responding to any OPUC requests for information concerning an emergency.

# G. Section 2.7 Procedures for communicating with Local and State Governmental Entities, Officials, and Emergency Operations Center during an emergency (pp. 10-12).

Oncor's Market Relations group communicates with local and state governmental entities, officials, and emergency operations centers during an emergency. Oncor's Community Liaisons facilitate information exchange with local governmental entities, including coordination with social services, emergency responders, and Oncor Area Managers. Oncor's Governmental Affairs team proactively contacts appropriate state government officials to address issues and answer questions during emergencies.

# **H.** Section 2.8 Procedures for communicating with ERCOT during an emergency (p. 12).

Oncor's TGO organization communicates with ERCOT during an emergency in accordance with the applicable ERCOT Nodal Protocols and Operating Guides and North American Energy Reliability Council Reliability Standards, in addition to Oncor's Standard Operating Procedures.

# I. Section 2.9 Procedures for communicating with Critical Load Customers directly served by Oncor (pp. 12-13).

In the event of an ERCOT Energy Emergency Alert Level 2 or 3, Oncor notifies critical load customers directly. Oncor provides critical load customers with advance notice of service interruptions when reasonably possible.

# III. 16 TAC § 25.53(d)(3) – Plan to Maintain Pre-Identified Supplies for Emergency Response

The requirement of 16 TAC § 25.53(d)(3) is addressed in Section 3 "Plan to Maintain Pre-Identified Supplies for Emergency Response" of the Oncor PUC EOP (pp. 13-14). To maintain pre-identified supplies for emergency response, Oncor maintains pre-kitted emergency material stock at its central distribution center and additional storm stock at the central distribution center and local service center storerooms. Oncor maintains a working reserve of long-lead-time assets to quickly address equipment failures and uses vendor inventory programs to optimize the availability of emergency stock. Oncor has 87 emergency material staging sites available across its service territory to expedite material and equipment deployment, and maintains favorable contracts and relationships with a diverse group of suppliers to secure adequate safety stock. Oncor also participates in mutual assistance programs with other utilities inside and outside of Texas for emergency acquisition of labor, materials, and equipment.

### IV. 16 TAC § 25.53(d)(4) – Plan to Address Staffing During Emergency Response

The requirement of 16 TAC § 25.53(d)(4) is addressed in Section 4 "Plan for Staffing During an Emergency" of the Oncor PUC EOP (pp. 14-16). To address staffing during an emergency, Oncor's real-time operations are managed by two Distribution Operation Centers ("DOCs") and one Transmission Grid Operations ("TGO") facility, which are staffed 24/7. Depending on the severity of the emergency, Oncor may initiate its Incident Command System ("ICS") as specified by the National Incident Management System. Oncor staffs its System Emergency Center ("SEC") 24/7 when the size of an emergency dictates centralized command and communications. Oncor employees have a position reserved at many municipal and county emergency operations centers. Oncor's Contact Center uses a surge program to expand staffing during periods of high call volume and has an escalation process to properly route issues. Oncor's restoration specialists and contractors are strategically located to quickly respond to restoration

efforts. Oncor can also receive staffing assistance from utilities in other regions through one of three Regional Mutual Assistance Groups.

# <u>V. 16 TAC § 25.53(d)(5) – Plan for Identification of Weather-Related Hazards and Process</u> <u>to Activate EOP</u>

The requirements of 16 TAC § 25.53(d)(5) are addressed in Section 5 "Plan for Identification of Weather-related Hazards & Activation of EOP" of the Oncor PUC EOP (pp. 16-18). Oncor's operations include 24/7 monitoring of weather conditions, including contracts with private weather information providers. Prior to severe weather events, these providers supply Oncor's T&D Regional Directors, Supply Chain Personnel, DOCs, TGO, and other teams with up-to-date information. National weather forecasts are checked daily for unfavorable conditions, and Oncor also receives notices from the National Oceanic and Atmospheric Administration's Dallas-Fort Worth office when severe weather is forecasted.

### VI. 16 TAC § 25.53(d)(6) – Annexes

The requirements of 16 TAC § 25.53(d)(6) and (e) are addressed in the Annexes to the Oncor PUC EOP described below (pp. 20-48). Section 6 "Annexes" of the Oncor PUC EOP (p. 18) addresses the requirement of 16 TAC § 25.53(d) that an entity must include in the EOP an explanation of why a provision of section (d) does not apply to the entity. In Section 6 of the Oncor PUC EOP, Oncor explains that the requirement of 16 TAC § 25.53(e)(1)(E) to include a hurricane annex does not apply to Oncor because no Oncor facilities are located within a hurricane evacuation zone, as defined by the Texas Division of Emergency Management.

# VII. 16 TAC § 25.53(e)(1)(A) – (D) and (F) – (H) – Annexes A through G

Annex A – 16 TAC § 25.53(e)(1)(A) – Weather Emergency Annex. The Weather Emergency Annex is provided on pp. 20-22 of the Oncor PUC EOP. Oncor's 24/7 TGO and DOC personnel are trained to respond to and address cold and hot weather emergencies. Staffing for hot and cold weather emergencies and weather monitoring are conducted in accordance with sections 4 and 5 of the Oncor PUC EOP, respectively. During a cold or hot weather emergency, Oncor employs a series of checklists to ensure adequate supplies and personnel are available and that emergency procedures are observed.

Annex B – 16 TAC § 25.53(e)(1)(B) – Load Shed Annex. The Load Shed Annex is provided on pp. 23-36 of the Oncor PUC EOP. During an EEA event, Oncor executes ERCOT's

operating instructions to maintain system integrity and equitably distribute the impact of load-shed to customers while considering the impact to critical and emergency loads. The Load Shed Annex describes the stages of emergency conditions identified by ERCOT (including load shed) and the procedures Oncor follows during each stage, including load shed.

The Load Shed Annex also describes Oncor's service restoration priorities that are maintained regardless of the severity of the event: (1) public and company safety, (2) Critical Customers, and (3) largest groups of customers first (*i.e.*, transmission lines, substations, feeders, laterals, busses, and individuals). Special conditions arising from the event pertaining to service interruptions that have the potential for life-threatening or hazardous consequences will be given priority status if expedited restoration at the location is practical.

The Load Shed Annex also describes Oncor's procedure for maintaining an accurate registry of critical load customers. Once a customer's premise has been identified as a critical load customer as defined in 16 TAC § 25.497, that customer's account is coded with a critical load customer code that becomes part of that customer's account record within the Oncor Customer Care and Billing System, which serves as Oncor's registry of critical load customers. The critical load customer registry is updated on an ongoing basis in response to requests received and approved to assign or renew critical load designations for customers.

When a service interruption is reported or detected, the critical load customer identification is made from the customer account records and is associated to an outage event in the outage management system used by the Oncor DOCs to manage restoration activities. Critical load customers are prioritized for restoration of service consistent with the ERCOT Guidelines, and the DOCs will pursue priority service restoration consistent with those Guidelines.

In the event of an ERCOT EEA Level 2 or 3, a proactive message is sent to critical load customers notifying them of the Alert. In addition, a message is sent when the Alert has been canceled. Additional contact with critical load customers by Oncor personnel may be made to notify them regarding the approximate length and severity of an outage, or to confirm that service has been restored.

During load shed events, Oncor maintains close communications with local governmental entities, state governmental entities, and the PUCT, including responding to PUCT inquiries and requests and dispatching an Oncor representative to the Texas Department of Emergency Management State Operations Center upon request.

The processes for maintaining an accurate registry of critical load customers are addressed in Oncor's work instructions, process flow diagrams, and training materials for employees who engage with those customers. Oncor employees who have responsibilities related to critical load customers receive training, which includes on-the-job training related to those responsibilities

Annex C – 16 TAC § 25.53(e)(1)(C) – Pandemic and Epidemic Annex. The Pandemic and Epidemic Annex is provided on pp. 37-40 of the Oncor PUC EOP. Oncor's Plan aims to (1) minimize disease transmission; and (2) sustain essential services through monitoring of media and health resources and coordination with applicable health authorities. The Plan includes the actions of nine discrete response groups who will act according to the level of virulence. Oncor's Plan is designed to provide Oncor the flexibility to coordinate actions across Oncor's various sites. The Plan describes the: (a) events that will trigger each step in the plan; (b) types, quantities and distribution procedure for contagion/illness prevention materials; (c) command-and-control framework to guide Oncor's pandemic response; and (d) tactics that each pandemic response group will execute at each step of the plan.

Annex D – 16 TAC § 25.53(e)(1)(D) – Wildfire Annex. The Wildfire Annex is provided on pp. 41-43 of the Oncor PUC EOP. When a wildfire warning is issued for any part of Oncor's service territory, Oncor's grid operators and other appropriate personnel are alerted of the condition. Oncor also has an automated process that utilizes National Weather Service ("NWS") broadcast warnings and incorporates them with enterprise data, which allows Oncor to evaluate potential responses across its service territory. This information is updated when new NWS information is available. Oncor has a proactive wildfire mitigation approach for its distribution and transmission system. Through the implementation of its various proactive maintenance programs and through its reactive maintenance efforts, Oncor inspects various equipment on its distribution system. During that work, Oncor may identify and address equipment issues. While the purpose of those inspections is not to identify potential wildfire hazards. Oncor proactively addresses any wildfire hazards discovered during that work. Oncor also performs periodic inspections of its transmission facilities and proactively addresses transmission structures and other components in need of repair or replacement. Potential hazards, including wildfire hazards, discovered during those inspections are remediated. Oncor uses the ICS for contingency planning during active wildfires. In active wildfire zones, Oncor implements procedures to minimize fire hazards when reclosing breakers or performing mainline switching in red flag warning areas.

Annex E - 16 TAC 25.53(e)(1)(F) – Cyber Security Annex. The Cyber Security Annex is provided on pp. 43-46 of the Oncor PUC EOP. Pursuant to Oncor's policies and procedures, Oncor investigates any computer or network security event on, or interfacing with, Oncor's computing environment. Oncor's Digital Grid Management Security Operations Center is the lead for all cyber security incidents and events. Annual training and testing will be conducted to ensure continued relevance, specificity, and viability in the protection of Oncor's cyber assets. Further, Oncor alerts and coordinates with the appropriate entities and agencies as required. Oncor incorporates the Incident Response Life Cycle from the National Institute of Standards and Technology.

Annex F - 16 TAC § 25.53(e)(1)(G) – Physical Security Incident Annex. The Physical Security Incident Annex is provided on p. 47 of the Oncor PUC EOP. Oncor complies with applicable state and federal requirements for reporting physical security incidents. Oncor has established processes and procedures to ensure that the required physical security incidents are appropriately reported and resolved.

Annex G – 16 TAC § 25.53(e)(1)(H) – Plan for Use of Facilities under PURA § 39.918(b)(1) or (2). The Plan for Oncor's use of facilities under PURA § 39.918(b)(1) or (2) is provided on p. 48 of the Oncor PUC EOP. Oncor presently leases 15 mobile generation units for electrical backup in the event of a widespread outage. These units are strategically positioned across Oncor's service territory. Operational guidelines have been established to ensure safety and seamless installation of mobile generation units, and Oncor personnel and local contract crews have been trained in the deployment and operation of such units. Each unit is inspected, maintained, and tested on a regular basis, and Oncor has strategic arrangements in place with contractors and fuel providers to ensure reliable operation once the units are deployed.

# VIII. 16 TAC § 25.53(c)(1)(A)(i)(III) – Record of Distribution.

The record of distribution of the Oncor PUC EOP required under 16 TAC § 25.53(c)(4)(A) is attached here as Exhibit 1. The names of the individuals receiving access to and training on the Oncor PUC EOP have been redacted in Exhibit 1, and an unredacted version of Exhibit 1 will be filed as a confidential document.

# IX. 16 TAC § 25.53(c)(1)(A)(i)(IV) – Affidavit.

The affidavit required under 16 TAC § 25.53(c)(4)(C) is attached here as Exhibit 2.

# X. 16 TAC § 25.53(c)(4)(A), (B), & (C) – Filing Requirements

The requirements of 16 TAC 25.53(c)(4)(A), (B), and (C) are addressed as described below.

### A. 16 TAC § 25.53(c)(4)(A)(i) and (ii)

The distribution table required by 16 TAC § 25.53(c)(4)(A)(i) and (ii) is included as Exhibit 1 to this Executive Summary, which is consistent with 16 TAC § 25.53(c)(1)(A)(i)(III)and states the titles and names of persons in Oncor's organization receiving access to and training on the Oncor PUC EOP. The names of the individuals receiving access to and training on the Oncor PUC EOP have been redacted in Exhibit 1, and an unredacted version of Exhibit 1 will be filed as a confidential document.

### B. 16 TAC § 25.53(c)(4)(B)

Oncor's list of primary and backup emergency contacts, including specific individuals who can immediately address urgent requests and questions from the PUCT during an emergency, is being filed separately and simultaneously with the filing of this Executive Summary. Consistent with the Commission's statement on page 71 of its *Order Adopting New 16 TAC §25.53 As Approved at the February 25, 2022 Open Meeting* in Project No. 51841, Oncor is filing its list of primary and backup and emergency contacts as confidential material.

# C. 16 TAC § 25.53(c)(4)(C)

The affidavit required by 16 TAC § 25.53(c)(4)(C) is attached to this Executive Summary as Exhibit 2 as required by 16 TAC § 25.53(c)(1)(A)(i)(IV).

### Respectfully submitted,

By: <u>/s/ Jo Ann Biggs</u>

Jo Ann Biggs State Bar No. 02312400

Vinson & Elkins LLP Trammell Crow Center 2001 Ross Avenue, Suite 3900 Dallas, Texas 75201-2975 Telephone: 214.220.7735 Facsimile: 214.999.7735 jbiggs@velaw.com

# EXHIBIT 1 to Executive Summary of Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

# Oncor Electric Delivery Company LLC's Record of Distribution of Public Utility Commission of Texas Emergency Operations Plan <u>Pursuant to 16 Tex. Admin. Code § 25.53(c)(4)(A)</u>

The attached Record of Distribution reflects the titles and names of Oncor personnel who received access to and trained on Oncor's PUC EOP and the date of access to or training on the Oncor PUC EOP as appropriate. Pages 13 through 19 contain the record of the distribution of the Oncor PUC EOP, and pages 20 through 33 contain the record of training relevant to the Oncor PUC EOP. The names of the individuals receiving access to and training on the Oncor PUC EOP have been redacted in Exhibit 1, and an unredacted version of Exhibit 1 will be filed as a confidential document.

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
PROJECT MGR SR-REGULATORY		4/8/22
MANAGER MARKET ENABLEMENT		4/8/22
PROJECT MGR SR-REGULATORY		4/8/22
SVP & CHIEF DIGITAL OFFICER		4/8/22
SR DIR - ENVIRONMENT AND NERC, RELIABILITY STDS COMPLIANCE		4/8/22
VP OF STRATEGY AND EMERGING ISSUES		4/8/22
SOUTH REGION MGR CUST SERVICE		4/8/22
DIRECTOR OF CUSTOMER & MARKET		4/8/22
DIRECTOR, METRO REGION CUSTOMER OPS		4/8/22
DIRECTOR METRO WEST		4/8/22
DIRECTOR OF TECHNOLOGY & CUST		4/8/22
SR. DIRECTOR DISTR ENGRNG		4/8/22
CUST SERVICE EXEC		4/8/22
DIR CUSTOMER SERVICE III-FW RE		4/8/22
DIRECTOR T & D SERVICES		4/8/22
VP, BUSINESS & OPERATIONS SERV		4/8/22
SR DIR MEASUREMENT SVCS,		4/8/22
SENIOR VP T&D OPERATIONS		4/8/22
DIR PUBLIC ADVOCACY		4/8/22
VP FORT WORTH CUSTOMER SERVICE		4/8/22
SR DIRECTOR SMART GRID COMM		4/8/22
SR VP & CFO		4/8/22
ASSISTANT CONTROLLER II		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
DIRECTOR T&D CAPABILITY		4/8/22
DIR TRAINING & DEV		4/8/22
MGR COMMUNICATIONS		4/8/22
DIRECTOR CLAIMS		4/8/22
DIR SOUTHEAST DISTB OPS		4/8/22
CUST SERVICE EXEC		4/8/22
DIRECTOR, REVENUE MANAGEMENT		4/8/22
SR. DIRECTOR, WORKFORCE STRATEGY		4/8/22
VP & ASSOC GEN COUNSEL		4/8/22
SVP & CHIEF CUST OFFICER		4/8/22
MGR CUSTOMER SERVICE		4/8/22
CUST SERVICE EXEC		4/8/22
PROGRAM MANAGER SPECIALIST		4/8/22
CUST SERVICE EXEC		4/8/22
VP DALLAS CUSTOMER SERVICE		4/8/22
CUST SERVICE EXEC		4/8/22
DIRECTOR - TRANSMISSION OPERATIONS		4/8/22
DIRECTOR WESTERN REGION		4/8/22
REGULATORY MGR II		4/8/22
SR DIR DISTB SERVICES		4/8/22
DIRECTOR INTEGRATED PLATFORM		4/8/22
DIRECTOR SYSTEM PROTECTION		4/8/22
DIRECTOR NEW CONSTRUCTION MGMT		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
VP CUSTOMER ENGAGEMENT		4/8/22
CUST SERVICE EXEC		4/8/22
VP REG TRANS & PLANNING, CHIEF SUSTAINABILITY OFFICER		4/8/22
DIR DIST OPS CNTR		4/8/22
DIR OF ONCOR PAC AND GRASSROOT		4/8/22
EXECUTIVE VICE PRESIDENT & COO		4/8/22
DIR CENTER FOR EXCELLENCE		4/8/22
SVP HR & CORP AFFAIRS		4/8/22
DIR DIST OPS CNTR		4/8/22
DIRECTOR OF BENEFITS		4/8/22
VICE PRESIDENT OF MEASUREMENT		4/8/22
CONTRACTOR		4/8/22
SVP & GENERAL COUNSEL		4/8/22
DIR-REGULATORY AFFAIRS, REGULATORY AFFAIRS_AUSTIN		4/8/22
SR CUST SERVICE EXEC		4/8/22
DIRECTOR METRO EAST		4/8/22
DIR OF PUBLIC POLICY		4/8/22
SR CUST SERVICE EXEC		4/8/22
SR VICE PRESIDENT & CIO		4/8/22
DIR TRANSMISSION SERVICES		4/8/22
VP DISTRIBUTION OPERATIONS		4/8/22
DIRECTOR TRANSMISSION ENGINEERING		4/8/22
SR. DIRECTOR DISTR ENGRNG		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
VICE PRESIDENT, REGULATORY AFFAIRS_AUSTIN		4/8/22
DIRECTOR - ENERGY EFFICIENCY		4/8/22
VP GOVT AFFAIRS		4/8/22
SENIOR DIRECTOR- DIGITAL GRID		4/8/22
MGR COMMUNICATIONS		4/8/22
SR. MGR CONTACT CENTER OVERSIGHT		4/8/22
CONTROLLER		4/8/22
ASSOC GEN COUNSEL		4/8/22
DIR PUBLIC ADVOCACY		4/8/22
CUST SERVICE EXEC		4/8/22
SENIOR DIRECTOR - TRANSMISSION		4/8/22
SR DIR T&D SUPPLY CHAIN, STRATEGIC SOURCING PROC		4/8/22
DIRECTOR SR - TRANSMISSION GRID OPS		4/8/22
DIRECTOR - MARKET PERFORMANCE		4/8/22
DIRECTOR NERC COMPLIANCE		4/8/22
CUST SERVICE EXEC ASSOC		4/8/22
SENIOR MARKET ADVOCATE		4/8/22
STAKEHOLDERS OPERATIONS MANAGE		4/8/22
CUST SERVICE EXEC		4/8/22
DIR FINANCIAL GOVERNANCE & DIGITAL PERF		4/8/22
DIR SYSTEM PLANNING		4/8/22
CHIEF EXECUTIVE OFFICER		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
DIRECTOR TECHNOLOGY STRATEGY		4/8/22
MGR CUST OPS REGION		4/8/22
SENIOR MARKET ADVOCATE		4/8/22
CUST SERVICE EXEC		4/8/22
DIRECTOR - ECONOMIC DEVELOPMENT		4/8/22
CUST SERVICE EXEC		4/8/22
MGR CUSTOMER SERVICE		4/8/22
DIR OF COMMUNICATION AND MARKET		4/8/22
DIRECTOR OF TRANSFORMATION AND, RELATIONSHIP MGMT		4/8/22
SR DIR TRANSM ENGINEERING		4/8/22
CUST OPS EXECUTIVE SR		4/8/22
CUST OPS EXECUTIVE		4/8/22
REGULATORY MGR II		4/8/22
DIR CORP COMPLIANCE		4/8/22
CUST OPS EXECUTIVE		4/8/22
DIR ASSET INVEST STRATEGY & REAL EST		4/8/22
DIRECTOR- COMMERCIAL & INDUSTRIAL		4/8/22
DIR OF TRANSMISSION PMO		4/8/22
SR DIR INTERNAL AUDIT		4/8/22
DIRECTOR-REP & MARKET RELATION		4/8/22
DIRECTOR CUSTOMER SERVICES		4/8/22
INFORMATION SECURITY OFFICER		4/8/22
VP REGULATORY, RATES_REGULATORY		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
CUST SERVICE EXEC		4/8/22
CUSTOMER OPERATIONS EXECUTIVE		4/8/22
SUPV MARKET OPS SUPPORT		4/8/22
DIRECTOR STRATEGIC SOURCING & PROCUREMENT		4/8/22
DIR CUSTOMER RELATIONS		4/8/22
DIR GOVERNMENT POLICY		4/8/22
VP TRANSMISSION OPS		4/8/22
DIR METRO EAST DISTB OPS		4/8/22
DIR ENG STANDARDS & MAINT STR		4/8/22
VP & ASSOC GEN COUNSEL		4/8/22
DIRECTOR CORP SECURITY		4/8/22
DIR OF DISTRIBUTION PMO		4/8/22
DIRECTOR TRANSMISSION ENGINEER		4/8/22
CUST SERVICE EXEC		4/8/22
CUST SERVICE EXEC		4/8/22
DIRECTOR-CONTACT CENTER OPS		4/8/22
DIRECTOR STRATEGY AND TECHNOLOGY		4/8/22
CUST SERVICE EXEC		4/8/22
DIRECTOR RATES & LOAD RESEARCH		4/8/22
CUST SERVICE EXEC		4/8/22
CUST SERVICE EXEC		4/8/22
SR DIR TOTAL REWARDS		4/8/22
REGULATORY MGR III		4/8/22
CUST SERVICE EXEC		4/8/22

TITLE	NAMES	DATES RECEIVED ACCESS TO PUC EOP
DIR SAFETY & HEALTH, SAFETY		4/8/22
VP OF MARKET RELATIONS		4/8/22
DIRECTOR METRO METER SVCS		4/8/22
DIRECTOR TRANSMISSION CONSTRUCTION		4/8/22
DIRECTOR PMDS PROCESS IMPROVEMENT		4/8/22
CUST SERVICE EXEC		4/8/22
CUST SERVICE EXEC		4/8/22
DIR HR OPERATIONS		4/8/22
DIRECTOR - NETWORK CAPABILITY		4/8/22
DIRECTOR OF REGULATORY TRANSMISSION		4/8/22
CUST SERVICE EXEC		4/8/22
CUST SERVICE EXEC SR		4/8/22

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST.OUTAGE COORD.		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/12/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/13/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		05/20/2021	SUMMER PREPAREDNESS TRAINING
DIST.OUTAGE COORD.		05/26/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/26/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/26/2021	SUMMER PREPAREDNESS
DIST. SYST. OPERATOR		05/26/2021	TRAINING SUMMER PREPAREDNESS
DIST. SHIFT SUPERVISOR		05/26/2021	TRAINING SUMMER PREPAREDNESS
DIST. SYST. OPERATOR		05/27/2021	TRAINING SUMMER PREPAREDNESS
DIST. SHIFT SUPERVISOR		05/27/2021	TRAINING SUMMER PREPAREDNESS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		05/27/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/27/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/27/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/27/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		05/27/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST.OUTAGE COORD.		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/02/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/03/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/03/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/03/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/03/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/03/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		06/09/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/09/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/09/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/09/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		06/10/2021	SUMMER PREPAREDNESS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		06/10/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/16/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/16/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/16/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/16/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/17/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/23/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/23/2021	SUMMER PREPAREDNESS TRAINING
DIST. SHIFT SUPERVISOR		06/23/2021	SUMMER PREPAREDNESS TRAINING
DIST. SYST. OPERATOR		06/24/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO SUPPORT ENG.		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		05/11/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/11/2021	SUMMER PREPAREDNESS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO SUPPORT ENG.		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/18/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
OTS TRAINING STAFF		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		05/25/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO MANAGER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO SUPPORT ENG.		06/01/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO SUPPORT ENG.		06/08/2021	SUMMER PREPAREDNESS TRAINING
TGO SUPPORT ENG.		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO SHIFT MANAGER		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/15/2021	SUMMER PREPAREDNESS TRAINING
TG OUTAGE COORD.		06/15/2021	SUMMER PREPAREDNESS TRAINING
TGO CONTROLLER		06/15/2021	SUMMER PREPAREDNESS TRAINING
OTS TRAINING STAFF		10/14/2021	BACKUP CONTROL CENTER ACTIVATION TRAINING
TGO CONTROLLER		10/14/2021	BACKUP CONTROL CENTER
TGO SHIFT MANAGER		10/14/2021	ACTIVATION TRAINING BACKUP CONTROL CENTER ACTIVATION TRAINING
TGO CONTROLLER		10/14/2021	BACKUP CONTROL CENTER
TGO CONTROLLER		10/14/2021	ACTIVATION TRAINING BACKUP CONTROL CENTER
TGO CONTROLLER		10/14/2021	ACTIVATION TRAINING BACKUP CONTROL CENTER ACTIVATION TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO CONTROLLER		10/14/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/14/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
OTS TRAINING MGR.		10/14/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
		10/01/0001	ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
		10/21/2021	ACTIVATION TRAINING
TGO SHIFT MANAGER		10/21/2021	BACKUP CONTROL CENTER ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
I GO CONTROLLER		10/21/2021	ACTIVATION TRAINING
TGO CONTROLLER		10/21/2021	BACKUP CONTROL CENTER
I GO CONTROLLER		10/21/2021	ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
		10/20/2021	ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO SHIFT MANAGER		10/28/2021	BACKUP CONTROL CENTER
		10/00/000	ACTIVATION TRAINING
TGO CONTROLLER		10/28/2021	BACKUP CONTROL CENTER
		11/04/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER
		11/04/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER
TOO CONTROLLER		11/04/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER
		11/01/2021	ACTIVATION TRAINING
TGO SHIFT MANAGER		11/04/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/04/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO SHIFT MANAGER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/11/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO SHIFT MANAGER		11/18/2021	BACKUP CONTROL CENTER
			ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER
		/	ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER
		11/10/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER
		11/10/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER
		11/19/2021	ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER ACTIVATION TRAINING
TGO CONTROLLER		11/18/2021	BACKUP CONTROL CENTER
I GO CONTROLLER		11/10/2021	ACTIVATION TRAINING
DIST. SYST. OPERATOR		06/29/2021	DE-ENERGIZING
DIST. STST. OF ERTOR		00/25/2021	UNDERGROUND NETWORKS
			TRAINING
DIST.OUTAGE COORD.		06/29/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
DIST. SYST. OPERATOR		06/29/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
DIST. SYST. OPERATOR		06/29/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
DIST. SHIFT SUPERVISOR		06/29/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
DIST. SYST. OPERATOR		06/30/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
DICT OVET ODED ATOD		06/20/2021	TRAINING
DIST. SYST. OPERATOR		06/30/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
DIST. SYST. OPERATOR		06/30/2021	TRAINING DE-ENERGIZING
DIST. STST. OFERATOR		00/30/2021	UNDERGROUND NETWORKS
			TRAINING
L			

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		06/30/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		06/30/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		06/30/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST.OUTAGE COORD.		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/07/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/07/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/07/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/07/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST.OUTAGE COORD.		07/15/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/15/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/15/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/15/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/15/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		07/28/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SYST. OPERATOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
DIST. SHIFT SUPERVISOR		08/04/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SHIFT MANAGER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		06/29/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SUPPORT ENG.		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
OTS TRAINING STAFF		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SUPPORT ENG.		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SHIFT MANAGER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TG OUTAGE COORD.		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/06/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SHIFT MANAGER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO SUPPORT ENG.		07/14/2021	DE-ENERGIZING UNDERGROUND NETWORKS
TGO CONTROLLER		07/20/2021	TRAINING DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SHIFT MANAGER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SUPPORT ENG.		07/20/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SHIFT MANAGER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO SUPPORT ENG.		07/27/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING UNDERGROUND NETWORKS TRAINING

TITLES	NAMES	DATE OF RELEVANT TRAINING	TRAINING RELEVANT TO PUC EOP
TGO SUPPORT ENG.		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TG OUTAGE COORD.		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
			TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
		0.0.10.0.10.0.0.1	TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
		00/02/2021	TRAINING
TGO SHIFT MANAGER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
		00/02/2021	TRAINING
TGO CONTROLLER		08/03/2021	DE-ENERGIZING
			UNDERGROUND NETWORKS
TGO CONTROLLER		08/03/2021	TRAINING DE-ENERGIZING
IGUCUNIKULLEK		08/03/2021	
			UNDERGROUND NETWORKS
			TRAINING

## EXHIBIT 2 to Executive Summary of Oncor Electric Delivery Company LLC's Public Utility Commission of Texas Emergency Operations Plan

## AFFIDAVIT OF ONCOR ELECTRIC DELIVERY COMPANY LLC Pursuant to 16 Tex. Admin. Code §§ 25.53(c)(4)(C) and (c)(1)(A)(i)(IV)

STATE OF TEXAS	§
	§
COUNTY OF DALLAS	§

**BEFORE ME**, the undersigned authority, on this day personally appeared E. Allen Nye, Jr., who, having been placed under oath by me, did depose as follows:

1. My name is E. Allen Nye, Jr. I am the Chief Executive Officer of Oncor Electric Delivery Company LLC ("Oncor"). I am of legal age and a resident of the State of Texas.

2. Oncor's relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Oncor Public Utility Commission of Texas Emergency Operations Plan ("Oncor PUC EOP"), and those personnel are instructed to follow the applicable portions of the Oncor PUC EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.

3. The Oncor PUC EOP has been reviewed and approved by the appropriate Oncor executives.

4. Drills concerning the Oncor PUC EOP have been conducted to the extent required by 16 Tex. Admin. Code § 25.53(f).

5. The Oncor PUC EOP or an appropriate summary has been distributed to local jurisdictions as needed.

6. Oncor maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.

7. Oncor'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.

The foregoing Affidavit offered by me is true and correct.

E. Allen Nye, Jr.

SUBSCRIBED AND SWORN TO BEFORE ME by the said E. Allen Nye, Jr. this 5+4 day of 4 or 1, 2022.

Eloise Brunton Long

BELOISE BRUNTON LONG Notary Public, State of Texas My Comm. Expires 09-14-2024 Notary ID 2552990 Notary Public, State of Texas