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Fighting Jays Emergency Operating Plan

Version 1.1 July 10, 2022





EXECUTIVE SUMMARY

The Fighting Jays Emergency Operations Plan (EOP) is an integrated response and management plan. The EOP addresses administrative procedures necessary for optimum and coordinated response to emergencies. The EOP outlines roles, responsibilities and the working relationships throughout the four phases of Emergency management: 1) mitigation, 2) preparation, 3) response and 4) recovery.

A significant strength in the EOP is that each Emergency support function annex of the plan was developed with the key personnel who will play a major role in an Emergency specific event. The Fighting Jays EOP is reviewed, comprehensively, on an annual basis. Ongoing tabletop mock exercises / drills for Fighting Jays are all-inclusive and serve to 1) support ongoing training and preparation and 2) identify areas for improvements and/or enhancements.

There are three main sections to this comprehensive plan: the Basic Plan, Functional Annexes, and Appendices with supporting attachments and tables. The information contained within this document is confidential; nevertheless, the following is a brief description of each section:

BASIC PLAN (BP)– This section addresses, in general terms, MBS’s response organization and policies. It summarizes the local hazards, assigns responsibilities for operations and planning, describes appropriate communications with external entities, describes maintaining pre-identified supplies for Emergency responses, addresses staffing and lastly includes how MBS identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding.

FUNCTIONAL ANNEXES – This section includes plans for activating the specific functions that MBS has identified as necessary to address local hazards. Each annex focuses on one Emergency function, and includes the following:

Annex A	Weather Emergencies
Annex B	Water Shortages
Annex C	Restoration of Services
Annex D	Pandemic & Epidemics
Annex E	Hurricane Evacuations & Re-entry
Annex F	Cyber Security
Annex G	Physical Security
Annex H	Personnel Injuries or Serious Health Conditions
Annex I	Fire Response Plan
Annex J	Chemical Oil Spills and Releases
Annex K	Threats to the Facility



Appendices – These appendices provide additional, detailed information. The following Appendices are included as part of this EOP:

Appendix 1	Record of Distribution
Appendix 2	Primary & Backup Emergency Contacts
Appendix 3	Affidavit

The coordination, integration, and update of the Fighting Jays EOP is an ongoing process that is conducted through interdivisional meetings, planning workgroups, training, and exercises. All MBS divisions are responsible for developing and maintaining current internal plans and procedures for carrying out the assigned responsibilities and Emergency functions in this plan and for ensuring that Personnel are adequately trained.



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REVISION HISTORY

This document will be reviewed and updated at least Annually. Any revisions must be recorded within the Revision History. Any such revisions to this plan will be communicated with appropriate agencies and organizations.

Recommendations to modify this plan may be made by any Personnel, but actual changes are to be made by any of the following: Plant Manager, Portfolio Manager, Compliance Director or any other personnel designated by either the Director of Operations, VP of Operations, or the President of Miller Bros Solar.

Any changes will be reviewed and approved by the Director of Compliance.

Revision	Description	Date	Editor
1.0	Initial Release prior to construction completion and COD	4/15/2022	Kristina Marriott
1.1	Updated Annex E with links relating to hurricane evacuations	6/10/2022	Kristina Marriott

This Emergency Operating Plan is hereby approved and therefore immediately supersedes any previous versions, related to the Fighting Jays facility.

Signature Block			
Signature:		Approval Date:	June 10, 2022
Printed Name:	Kristina Marriott	Title:	Compliance Director



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1.0 FACILITY

Miller Bros. Solar (MBS) – Fighting Jays Solar Park (aka “Fighting Jays” or “facility”) is a 351.29 MWac (nameplate) photovoltaics (PV) solar facility located in Fort Bend County, Texas and does not require water or fuel switching for generating.

[REDACTED]

[REDACTED]

MBS will be the registered Generator Owner (GO) and Generator Operator (GOP) for the Fighting Jays facility.



2.0 PURPOSE

This EOP provides general guidance for Emergency management activities and an overview of MBS methods of preparedness, response, and recovery. This plan further describes the Fighting Jays Emergency response and assigns responsibilities for various Emergency tasks. This plan is intended to provide a framework for more specific functional annexes.

2.1.ERCOT and Public Utilities Commission of Texas

This EOP provides guidance and direction to MBS regarding compliance with the Emergency operations requirements for power generation companies (PGC) under Chapter 25 of the Public Utilities Commission of Texas (PUCT) Electric Substantive Rules.

This procedure does not manage nor address Emergency Preparedness and Operations (EOP) processes relating to NERC standard requirements (such as EOP-004 and EOP-005).

2.2.Occupational Safety and Health Administration

This EOP has been developed to ensure compliance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.38 (Emergency Action Plans). MBS acknowledges awareness that any significant changes in types or quantities of chemicals or other hazards on the site will necessitate review of this plan.

Beyond compliance with the rules noted above, MBS recognizes that proper planning for Emergency operations is critical to provide a coordinated response that protects life, property, and the environment.



3.0 SCOPE & ASSUMPTIONS

3.1.SCOPE

This EOP is used for the Fighting Jays facility and is applicable to all Miller Bros Solar (MBS) employees, its subsidiary and affiliated companies, its contract workers, temporary agency personnel and vendor personnel (collectively, "Personnel") and will be made readily available to all of the Personnel.



3.2.ASSUMPTIONS





4.0 DEFINITIONS

Annual or Annually – at least once every calendar year, with the calendar year beginning on January 1 and ending on December 31

Drill – an operations-based exercise that is a coordinated and supervised activity, employed to test the EOP or a portion of the EOP

Emergency – a situation in which the known, potential consequences of a Hazard or Threat are sufficiently imminent and severe that MBS should take prompt action to prepare for and reduce the impact of harm that may result from the hazard or threat. This term includes an Emergency declared by local, state, or federal government, or ERCOT or another reliability coordinator designated by the North American Electric Reliability Corporation and that is applicable to both MBS and Fighting Jays.

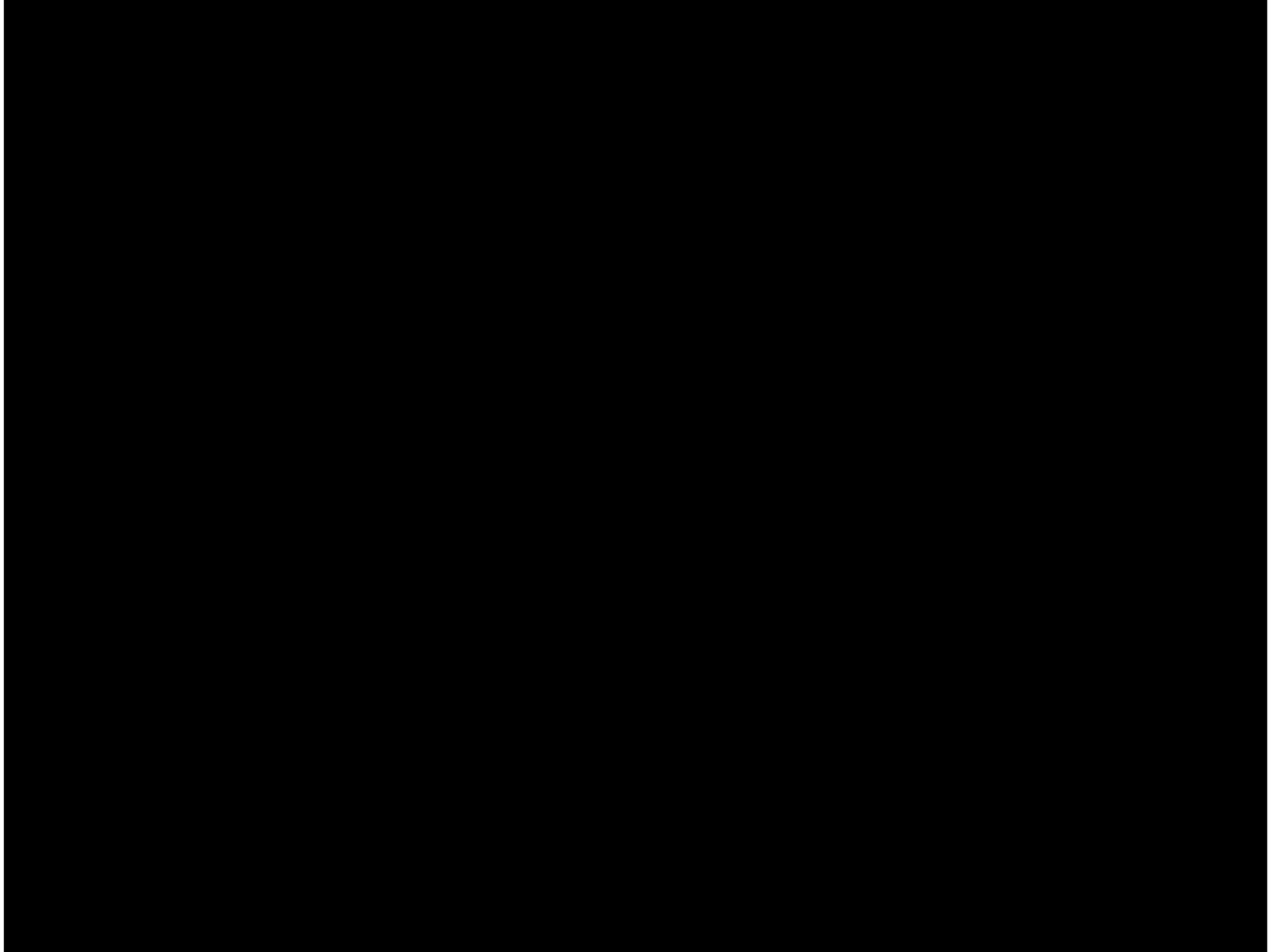
Hazard – a natural, technological, or human-caused condition that is potentially dangerous or harmful to life, information, operations, the environment, or property, including a condition that is potentially harmful to the continuity of electric service.

Threat – the intention and capability of an individual or organization to harm life, information, operations, the environment, or property, including harm to the continuity of electric service.



5.0 HAZARD SUMMARY

A summary of major Hazards that could possibility impact Fighting Jays is provided in Figure 1.





6.0 EMERGENCY MANAGEMENT ACTIONS

6.1.Mitigation

[REDACTED]

6.2.Preparedness

[REDACTED]

6.3.Response

[REDACTED]

6.4.Recovery

[REDACTED]



7.0 CRITICAL FAILURE POINTS





[REDACTED]

[REDACTED]





8.0 ROLES & RESPONSIBILITIES

Most MBS Personnel have Emergency functions in addition to their normal day-to-day duties. During Emergency situations, normal organizational arrangements are modified to facilitate Emergency operations. The MBS organization for Emergencies includes an executive group, crisis response team, and support services.

8.1.Executive Group



8.2.Crisis Response Team





[REDACTED]

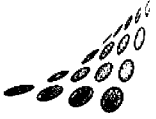
8.3.Plant Manager

[REDACTED]

[REDACTED]

8.4.Personnel

[REDACTED]



9.0 SEVERE WEATHER & IDENTIFICATION

[REDACTED]

9.1.Pre-season planning

[REDACTED]

9.2.Seasonal Events

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10.0 GENERAL PROCEDURE

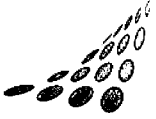
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[REDACTED]

If the event is a fire, medical, or police Emergency, contact 911 immediately.

10.1. General Emergency Protocols

[illegible]



7) [REDACTED]

a. Immediate Site Evacuation

[REDACTED]

b. Delayed Site Evacuation

[REDACTED]

c.

[REDACTED]

[REDACTED]



[REDACTED]



11.0 COMMUNICATIONS

11.1. Emergency Communication Systems

[REDACTED]

11.2. Communication Between Facility & Operation Center

[REDACTED]

11.3. Public Relations / Communications

[REDACTED]

11.4. Communications With Political Entities

[REDACTED]

11.5. Communication Infrastructure

[REDACTED]



12.0 REQUIRED EOP DRILL

12.1. Annual Drill

[REDACTED]

12.2. Drill Requirements

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



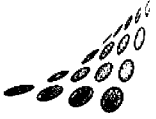
ANNEX A: WEATHER EMERGENCY





ANNEX B: WATER SHORTAGE

The facility is PV solar facility and does not require water for generating.



ANNEX C: RESTORATION / RESPONSE TIMES

[REDACTED]	
[REDACTED]	
[REDACTED]	
[REDACTED]	



ANNEX D: PANDEMIC / EPIDEMIC RESPONSE

[REDACTED]

[REDACTED]

[REDACTED]

PANDEMIC THREAT LEVELS

[REDACTED]

[REDACTED]



[REDACTED]

PANDEMIC DISEASE CONTAINMENT/CONTROL STRATEGIES

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

ESSENTIAL FUNCTIONS AND PERSONNEL

[REDACTED]



PLANNING ASSUMPTIONS

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

RESOURCES AND RELATED REFERENCES

CDC Pandemic Influenza webpage: <https://www.cdc.gov/flu/pandemic-resources/index.htm>

World Health Organization (WHO) webpage: <https://www.who.int/emergencies/diseases/en/>

World Health Organization (WHO) phases and government response stages: Taken from *Pandemic Influenza: Preparedness, Response, and Recovery; Guide for Critical Infrastructure and Key Resources* (<https://www.dhs.gov/sites/default/files/publications/cikrpandemicinfluenzaquide.pdf>)



Miller Brothers Solar (MBS)
Operations and Maintenance
Fighting Jays Emergency Operating Plan

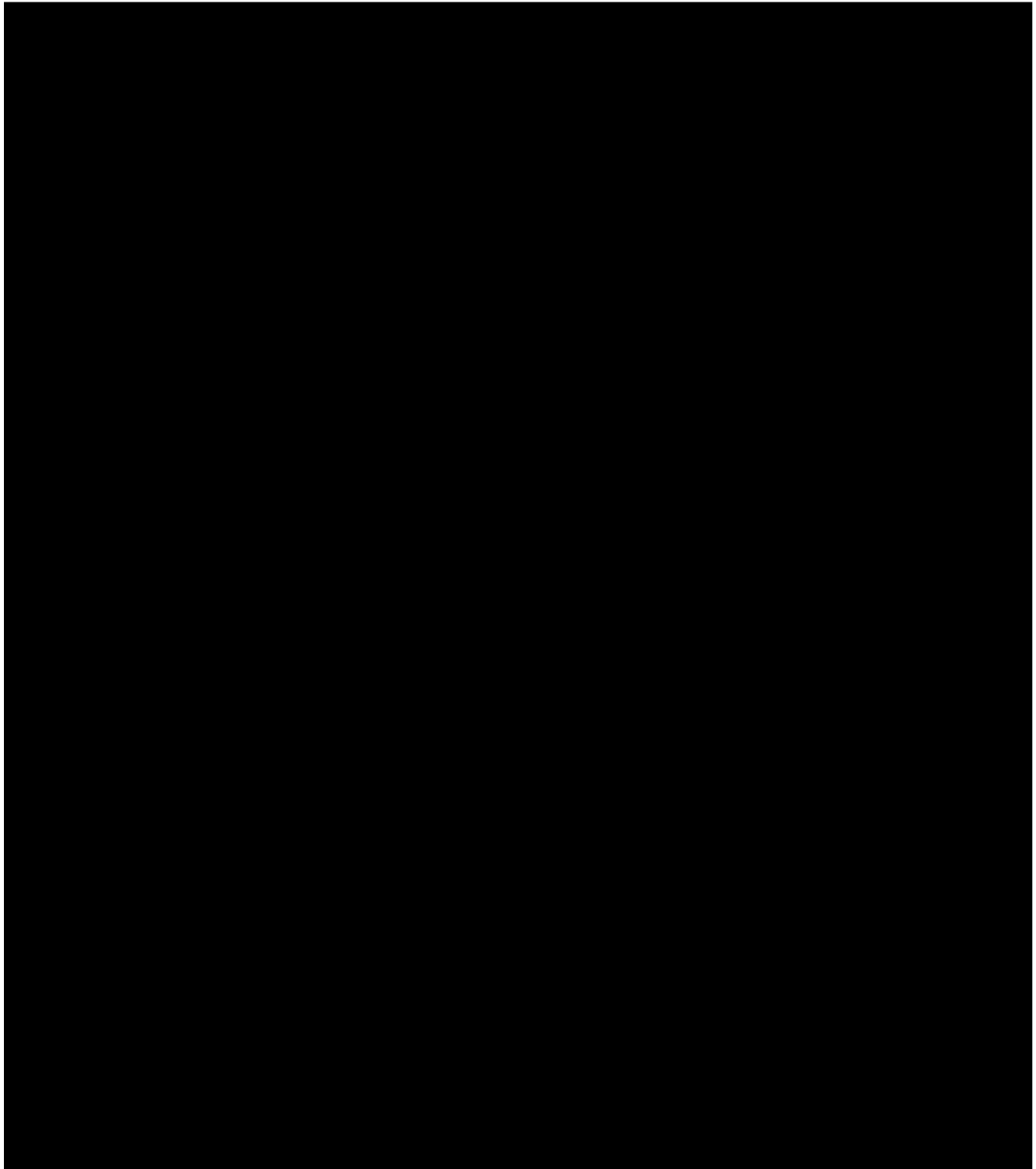
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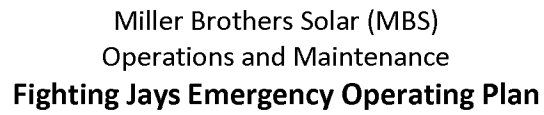
WHO Phases		Federal Government Response Stages	
INTER-PANDEMIC PERIOD			
1	No new influenza virus subtypes have been detected in humans. An influenza virus subtype that has caused a human infection may be present in animals. If present in animals, the risk of human disease is considered to be low.	0	New domestic animal outbreak in at-risk country
2	No new influenza virus subtypes have been detected in humans. However, a circulating animal influenza subtype poses a substantial risk of human disease.		
PANDEMIC ALERT PERIOD			
3	Human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.	0	New domestic animal outbreak in at-risk country
		1	Suspected human outbreak overseas
4	Small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.	2	Confirmed human outbreak overseas
5	Larger cluster(s) but human-to-human spread still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be fully transmissible (substantial pandemic risk).		
PANDEMIC PERIOD			
6	Pandemic phase: increased and sustained transmission in general population.	3	Widespread human outbreaks in multiple locations overseas
		4	First human case in North America
		5	Spread throughout United States
		6	Recovery and preparation for subsequent waves



PANDEMIC PLANNING CHECKLIST

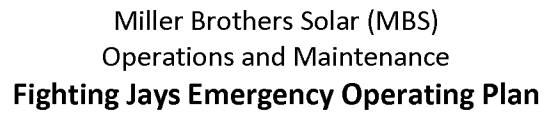
Instructions: [Emergency Operations Response Commander] Use this checklist to start the planning and response processes. Add items, as needed.

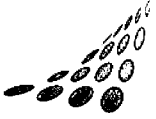




33







[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Designated Egress Routes and Muster Areas for Evacuations

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



ANNEX F: CYBER SECURITY

In the event of a cyber security Emergency, the NERC CIP Cyber Security Incident Response Plan shall be followed. All notifications and reporting to government authorities shall be performed by the Director of Compliance.



ANNEX G: PHYSICAL SECURITY / SABOTAGE REPORTING

In the event of a breach in physical security, or facility sabotage, the Plant Manager or designee shall:

- 1) Dial 911.

[REDACTED]

[REDACTED]

[REDACTED]



ANNEX H: PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

[REDACTED]

[REDACTED]

Basic First Response Actions

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



ANNEX I: FIRE RESPONSE PLAN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]



ANNEX J: CHEMICAL OR OIL SPILLS AND RELEASES

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



community or the environment. If a threat is imposed to the community or

[REDACTED]

[REDACTED]

[REDACTED]

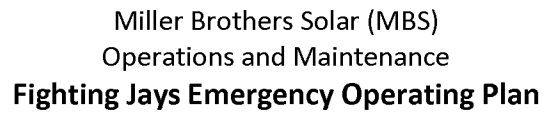
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]



APPENDIX 2: CONTACT LIST



Fighting Jays Emergency Coordinators	
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
Miller Bros. Solar Corporate Office Emergency Coordinators	
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]	[REDACTED] [REDACTED] [REDACTED]

In the event of a fire Emergency, medical Emergency, police Emergency or weather-related Emergency, ensure that the following roles are notified after Emergency responders are contacted.

Title	Name	Phone Number
Plant Manager Emergency Lead	[REDACTED]	
Portfolio Manager		
Control Center Manager		
Sr. Director Utility and Distributed Energy Services		
Sr. Director of Utility Services		
Director of Business Operations		
Chief Technology Officer		
Director of Compliance		
President		



APPENDIX 3: AFFIDAVIT

All relevant MBS Personnel are familiar with the contents of the Emergency operations plan and are committed to following the plan, except to the extent deviations are appropriate under the circumstances during the course of an Emergency.

See the signed Affidavit on the following page.