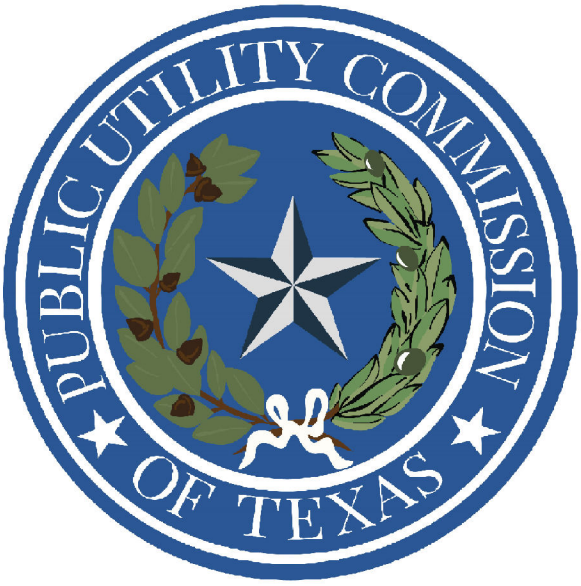

Filing Receipt

Received - 2022-07-11 02:40:36 PM
Control Number - 53385
ItemNumber - 752

WEST TEXAS SOLAR PROJECT II LLC

POLICY NAME	Emergency Operations Plan
EFFECTIVE DATE	11/23/2022 (the forecasted start of commercial operations)
VERSION NO.	1.0

1.0 Executive Summary

1.1 Facility Information

West Texas Solar Project II LLC ("West Texas Solar II" or the "Facility") is a 203.8 MWac (nameplate) solar energy generation facility located in Pecos County, TX. The Facility is interconnected to ERCOT at the Pig Creek Substation, located in TRE footprint, and is due to commence commercial operations in the 4th quarter of 2022. This Plan will become effective upon the start of commercial operations.

1.2 ERCOT and Public Utility Commission of Texas

This Plan provides guidance and direction to West Texas Solar II regarding compliance with the emergency operations requirements for power generation companies (PGC) under Chapter 25 of the Public Utility Commission of Texas (PUCT) Electric Substantive Rules and covers all in-scope Subchapter C Infrastructure and Reliability requirements as well as the EOP submission scope in ERCOT Nodal Protocol Section 3.21. West Texas Solar II will maintain separate Winter and Summer Weatherization Plans that help meet compliance with the severely hot and severely cold weather planning required by the PUCT.

This Plan does not manage nor address Emergency Preparedness and Operations (EOP) processes relating to NERC standard requirements (such as EOP-004 and EOP-005). NERC related EOP processes are addressed in separate documents.

1.3 Occupational Safety and Health Administration

This Plan additionally ensures compliance with Occupational Safety and Health Administration (OSHA) 29 CFR 1910.38 (Emergency Action Plans). West Texas Solar II acknowledges awareness that any significant changes in types or quantities of chemicals or other hazards on the site will necessitate review of this plan. Any such revisions to this plan will be communicated with appropriate agencies and organizations.

Beyond compliance with the rules noted above, West Texas Solar II recognizes that proper planning for emergency operations is critical to provide a coordinated response that protects life, property, and the environment.

1.4 Primary and Backup Emergency Contacts

As of the submission date, the below individuals are the primary and backup emergency contacts for West Texas Solar II who can immediately address urgent requests and questions from the PUCT during an emergency.

Emergency Coordinators			
Primary Emergency Coordinator	Joshua Turner	XXXXX@XXXXX	(415) XXX-XXXX
Alternate Emergency Coordinator	Clay Strickland	XXXXX@XXXXX	(720) XXX-XXXX

1.5 TAC §25.53 Requirements Reference

TAC §25.53 Reference	Requirement	Page	EOP Reference
(c)(1)(A)(i)(I)	Executive Summary – Policies and Contents	5	Section 1.0
(c)(1)(A)(i)(II)	Executive Summary – Requirements Reference	6	Section 1.5
(c)(4)(A)	Executive Summary – Record of Distribution	7	Section 1.6
(c)(4)(B)	Primary and Backup Emergency Contacts	5	Section 1.4
(c)(4)(C)	Executive Summary - Affidavit	8	Section 1.7
(d)(1)	Approval and Implementation Section	11	Section 3.0
(d)(2)	Communication Plan	12	Section 4.0
(d)(3)	Emergency Response Supplies	13	Section 5.0
(d)(4)	Emergency Staffing	13	Section 6.0
(d)(5)	Weather Hazard Identification and EOP Activation	14	Section 9.0
(e)(2)(A)(i)	Weather Emergency Annex - Operational Plan for Hot/Cold Emergency	21	Weather Emergency Annex
(e)(2)(A)(ii)	Weather Emergency Annex - Fuel Switching Equipment Verification		N/A
(e)(2)(A)(iii)	Weather Emergency Annex - Checklist for Supplies and Personnel	22	Weather Emergency Annex
(e)(2)(B)	Water Shortage Annex		N/A
(e)(2)(C)	Restoration of Service Annex	22	Restoration of Service Annex
(e)(2)(D)	Pandemic and Epidemic Annex	22	Pandemic and Epidemic Annex
(e)(2)(E)	Hurricane Annex	23	Not within a TDEM Hurricane Evacuation Study Area
(e)(2)(F)	Cybersecurity Annex	27	Cybersecurity Annex
(e)(2)(G)	Physical Security Annex	28	Physical Security Annex
(e)(2)(H)	Additional Annexes		Not required
(f)	Drill Administration	13	7.0

1.6 Record of Distribution

Below is a record of all West Texas Solar II Personnel with access to the Emergency Operations Plan. All personnel were given access on the date of the EOP filing. All personnel will be trained on this EOP when the plan is initially implemented, when any revisions are made, and by the start of each Summer Season:

Name	Company	Role	Date Trained
Joshua Turner	Fundamental Renewables LLC	Primary Emergency Coordinator	
Clay Strickland	Solar CM, LLC	Alternate Emergency Coordinator	

1.7 TAC §25.53 Affidavit

The undersigned below is the entity's highest-ranking representative, official, or officer with binding authority over West Texas Solar II, and affirms the following:

1. Relevant operating personnel will be familiar with and will have received training on the applicable contents and execution of the EOP, and such personnel will be instructed to follow the applicable portions of the EOP except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency;
2. The EOP has been reviewed and approved by the appropriate executives;
3. Drills will be conducted to the extent required by subsection (f) of this section prior to the earlier of 11/23/2022 or the start of commercial operations;
4. The EOP or an appropriate summary will be distributed to local jurisdictions as needed;
5. West Texas Solar II will maintain a business continuity plan that addresses returning to normal operations after disruptions caused by an incident; and
6. West Texas Solar II's emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events will receive the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training prior to the earlier of 11/23/2022 or the start of commercial operations.

DocuSigned by:
6B73792F385D4FD...

Laurence Gottlieb

Authorized Signatory

West Texas Solar Project II LLC

2.0 ROLES AND RESPONSIBILITIES

This EOP applies to the West Texas Solar Project II LLC described in Section 1.1 of the EOP. This Section describes the responsibilities and activities required of various parties in preparation for an emergency situation. West Texas Solar II understands that corporate and facility management, with critical execution and support from the O&M Provider, will play an important role in maintaining an effective emergency operations plan at the Facility. It is the responsibility of all personnel to exercise good judgment in the performance of this plan.

2.1 WEST TEXAS SOLAR II PERSONNEL

2.1.1 Role – O&M, GO and GOP Compliance, and Asset Management personnel, which include all roles listed in this section.

2.1.2 Responsibilities

a. Participate in plan training.

b. Follow this plan and perform actions, as described in this plan.

2.2 WEST TEXAS SOLAR II GENERATOR OWNER COMPLIANCE MANAGER

2.2.1 Role – The Generator Owner Compliance Manager for the Facility.

2.2.2 Responsibilities:

a. Owner of this Plan.

b. Administer Generator Owner (GO) Compliance Program for the Facility.

c. Responsible for maintaining and implementing, in coordination with O&M and Asset Personnel, this Plan.

2.3 WEST TEXAS SOLAR II GENERATOR OPERATOR COMPLIANCE MANAGER

2.3.1 Role – The Generator Operator Compliance Manager for the Facility.

2.3.2 Responsibilities:

a. Participate in the development and review of this Plan.

b. Administer Generator Operator (GOP) Compliance Program for the Facility.

2.4 O&M OPERATIONS CONTROL CENTER MANAGER

2.4.1 Role – The Operations Control Center (OCC) Manager for the Operations and Maintenance contractor, also the Generator Operator (GOP) of the Facility.

2.4.2 Responsibilities:

a. Responsible for Emergency response and essential operations to restore Operations Control Center functionality.

b. Participate in training.

2.5 FACILITY LEAD

2.5.1 Role – The plant services manager.

2.5.2 Responsibilities:

a. Participate in the administration, execution, and update of the plan.

b. Oversee the day-to-day operation of the Facility.

c. Serves as the summer and winter readiness coordinator.

d. Ensure the requirements and processes laid out in this plan are followed by all site Personnel.

e. Provide feedback to management on this plan and any lessons learned to improve the plan.

2.6 O&M FIELD TECHNICIANS

2.6.1 Role – Administers O&M responsibilities at the Facility

2.6.2 Responsibilities:

a. Coordinate with the Facility Lead Technician to ensure that this plan is properly executed.

b. Participate in responses to emergency events at the Facility.

c. Conduct any plan readiness reviews and provide reports to management.

d. Ensure the requirements and processes laid out in this plan are followed by all site Personnel.

e. Provide feedback to the Facility Lead Technician on this plan and any lessons learned to improve the plan.

2.7 ASSET MANAGEMENT

2.7.1 Role – Asset Management subcontractor for the Facility

2.7.2 Responsibilities:

a. Participate in the administration, execution, and update of the plan.

b. Coordinate with O&M, GO, GOP contractors in compliance and operations matters.

c. Participate in training.

2.8 ASSET OWNER

2.8.1 Role – Investor with primary ownership of the Facility

2.8.2 Responsibilities:

a. Sign affidavits regarding completion of the plan.

b. Coordinate with Asset Manager on compliance and operations matters.

c. Participate in training.

3.0 APPROVAL, IMPLEMENTATION, AND CONTINUAL IMPROVEMENT

3.1 Introduction and Applicability

This Plan provides guidance and direction to West Texas Solar II regarding compliance with the emergency operations requirements for power generation companies (PGC) under Chapter 25 of the Public Utility Commission of Texas (PUCT) Electric Substantive Rules and covers all in-scope Subchapter C Infrastructure and Reliability requirements as well as the EOP submission scope in ERCOT Nodal Protocol Section 3.21. West Texas Solar II will maintain separate Winter and Summer Weatherization Plans that help meet compliance with the severely hot and severely cold weather planning required by the PUCT.

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

3.2 Revision Control

Change control for the Plan is managed and owned by the GO Compliance Manager for West Texas Solar II. A summary of revisions and individuals responsible for maintaining, implementing, and changing the plan is listed below.

VERSION HISTORY				
VERSION	**APPROVED BY**	**REVISION DATE**	**DESCRIPTION OF CHANGE**	**AUTHOR**
1.0	Joshua Turner	NA	New procedure	B. Knowles

Version 1.0 of this EOP was approved on 07/11/2022.

Version 1.0 of this EOP supersedes all previous EOPs as of 07/11/2022.

3.3 Continual Improvement

In addition to periodic training, this plan will be reviewed and revised to ensure constant improvement addressing regional and operational changes in conditions and lessons learned.

Annual Compliance Review and Report

Annually, the compliance staff will perform a detailed review and confirmation that Facility personnel are following this procedure and identify areas for improvement.

Annual Improvement Plan

As part of the Annual Compliance Review, the compliance staff will develop an Annual Improvement Plan for the following year that will address any areas of concerns as well as integrate new industry Best Practices to the procedure.

4.0 COMMUNICATION PLAN

4.1 Media

If any member of the Project is contacted by someone claiming to be a media representative, the member will state upfront that no comment can be provided. The member will request their name, phone number, and their represented publication, and will tell them their contact information will be sent to the appropriate party. The member will not provide any company or personnel contact information. Personnel contact information contained in this EOP is confidential information.

Notify Asset Management of the request for media communication. Asset Management will coordinate requests for media communication with the Asset Owner.

4.2 Public Utility Commission

The Public Utility Commission has access to the confidential contact information of the EOP, as well as any contact information publicly filed. Requests from the Public Utility Commission will depend on the context. If the Primary or Backup Emergency Coordinator is contacted by Public Utility Commission staff related to an emergency event, request their name, title, and phone number, and answer all questions to the best of your ability. Provide any additional contact information including referrals to other emergency response stakeholders.

If a member of Public Utility Commission staff wishes to discuss the content of this EOP or has other regulatory compliance related questions, direct the Public Utility Commission staff to the Asset Manager. Provide the contact information of the Asset Manager if necessary.

4.3 Office of Public Utility Counsel (OPUC)

The OPUC may have access to the confidential contacts of the EOP. If the Primary or Backup Emergency Coordinator is contacted by OPUC staff, refer the caller to the Asset Manager.

4.4 Fuel Suppliers

The Facility is not dependent on fuel suppliers to operate; accordingly, this portion of the Communications Plan required by 16 TAC Sec. 25.53 is inapplicable to West Texas Solar II.

4.5 Local and State Government Entities, Officials, and Emergency Operations Centers

The Facility Lead Technician and the O&M Field technicians should work directly with local emergency responders including fire, police, or emergency medical services to coordinate services on site.

Any contact from a local government official, such as a city manager, council member, city engineer, or mayor shall refer the communication to the West Texas Solar II Generator Operator Compliance Manager, who will coordinate with the West Texas Solar II Generator Owner Compliance Manager and the Asset Manager for responses.

Requests for coordination with any emergency operations center, such as the Texas Division of Emergency Management (TDEM), shall be referred to the West Texas Solar II Generator Operator Compliance Manager, who will coordinate with the West Texas Solar II Generator Owner Compliance Manager and the Asset Manager for responses.

4.6 Reliability Coordinator

The O&M OCC communicates with the Transmission Operator (TOP) and Qualified Scheduling Entity (QSE), as needed and in accordance with NERC and ERCOT reliability standards and procedures. The TOP is AEP Texas Inc., and the QSE is Tenaska Power Services Co. Real-time operations are coordinated between the 24/7 control centers of these three entities.

The O&M OCC represents the Facility as a Resource Entity in ERCOT, and real-time communications to ERCOT such as outage reporting, telemetry, and verbal dispatch are directed through the QSE.

5.0 PLAN TO MAINTAIN PRE-IDENTIFIED SUPPLIES

West Texas Solar II will keep the following pre-identified emergency supply inventory onsite. This inventory checklist will be confirmed annually and before each winter and summer season.

Item(s)	Quantity	Notes
Tarps	TBD	To be finalized prior to commercial operations
Blankets	TBD	To be finalized prior to commercial operations
Battery-powered radio with NOAA weather alert tone	TBD	To be finalized prior to commercial operations
Extension cords	TBD	To be finalized prior to commercial operations
First Aid Kits	TBD	To be finalized prior to commercial operations

6.0 EMERGENCY STAFFING PLAN

The O&M team will notify regional staff within a 2-hour dispatch to remain on call for response requirements as needed. This will include technicians assigned to the generator as well as other resources in the vicinity. Should conditions at the Facility require manpower beyond the capabilities of the local staff, qualified third-party resources will be engaged as well as O&M personnel beyond the local employees.

7.0 TRAINING

All personnel at the Facility will receive training on this Emergency Operations Plan whenever it is modified or on at least an annual basis, before the start of the summer season (June 1st). Personnel will also be trained when this plan is initially implemented. Contractors and visitors who enter operating areas of the Facility will be trained on plant alarms, muster locations, and evacuation procedures before they enter the Facility for the first time, and at least annually thereafter.

7.1 Annual Drill

The Facility Plant Manager will ensure that a drill of this plan occurs annually, unless a response to an actual event has occurred in the calendar year that activated this Plan. Upon completion of the drill, the Compliance Manager will provide evidence of completion. The Compliance Manager will notify PUCT staff and the applicable TDEM district coordinator at least 30 days before the drill with the date, time, and location of the drill.

7.2 Drill Requirements

The content of each drill will be based on current needs and will be determined by the Compliance Manager. The annual drill must include a documented evacuation of the substation control building (if applicable). A roster of drill attendees and the date the drill was conducted will be filed with this plan and retained in the Facility document repository.

Any gaps or action items that are a result of the drill will be identified, resolved, fully documented, and filed with the Facility documents.

8.0 FACILITY EMERGENCY CONTACTS

The West Texas Solar II Emergency Coordinator is responsible for specific actions detailed in this plan (as noted). Alternate personnel may serve as the Facility Emergency Coordinator when necessary.

EMERGENCY CONTACTS
9-1-1
State of Emergency Services: **Hazardous Material Spills (State): 800-832-8224** **Weather Warning Center: https://www.weather.gov/**
Poison Control: (800) 222-1222

Non-Emergency Contacts:	Phone:
County Sheriff (use Police Dept. for emergencies)	(432) 336-3521
State Environmental Agency	(210) 490-3096
National Response Center (NRC)	(800) 424-8802
Regional Water Resources Board	(512) 463-7847
OSHA	(210) 472-5040
Fish & Game, Environmental Division	(830) 317-3333
Police Department	(432) 445-4911
Fire Department	(432) 336-4600

9.0 WEATHER HAZARD IDENTIFICATION AND EOP ACTIVIATION PROCEDURE

West Texas Solar II will identify weather-related hazards such as tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought and flooding through the National Weather Service alert system. The O&M OCC will be a 24x7 staffed desk responsible for monitoring NWS alerts. The O&M OCC will activate the EOP by notifying the appropriate West Texas Solar II Personnel for the specified type of emergency. The procedures of this EOP, including the annexes, will be identified in the emergency communication.

The Facility has five meteorological sensor stations which include irradiance, temperature, air pressure, and wind speed sensors.

The Facility uses Nextracker tracking systems with automatic stow protections based on various weather conditions.[1] The O&M OCC (remotely) and O&M Field Technicians (locally) can also manually set stow conditions as needed.

Stow Trigger	Trigger Condition	Stow Condition	Notes
Wind Stow	> OR = to 30 mph	60° into the wind	Trackers resume normal operation after 30-minute wait period after wind stow is triggered
Snow Stow	> 50% of clearance height	60°	Trackers go to nearest maximum tilt and then return to normal tracking
Flood Stow	Water depth ≥ (clearance height minus 1 ft)	0°	Overwritten by hail or snow stow
Hail Stow	Hail alert from Weather Forecast Service	60°	After hail stow, trackers must be returned to Auto Tracking by user

10.0 PERSONNEL INJURIES OR SERIOUS HEALTH CONDITIONS

The following sections provide basic guidelines for response actions to be taken in the event of emergencies related to personnel health. Although Facility personnel should take the most aggressive response actions that are prudent in an emergency, the first and foremost action will be to call 911 to initiate the response of trained outside medical responders. To prepare Facility personnel for such contingencies, it will be the Facility policy that all operating personnel and as many other personnel as possible should be trained in CPR (Cardiopulmonary Resuscitation) and in the use of an AED (Automated External Defibrillator) if one is available. If present on site, the AED will be maintained at the Facility at the designated location in the O&M building.

Note: Severe weather condition-related injuries are covered in the appropriate Plan.

Basic First Response Actions

- Check for unresponsiveness. Unresponsiveness is when the person is unconscious and does not respond when you call their name or touch them.
- If the person is unresponsive, immediately call 911 for outside medical assistance and ask other personnel to bring the AED to the scene. Other personnel should assist with 911 notifications and expediting the delivery of the AED to the scene.
- Next check to see if the victim is breathing normally. If no signs of breathing are observed, the responder should initiate two rescue breaths into the victim. After the rescue breaths, a pulse should be checked for on neck. If a pulse is present, continue with recovery breathing, but do not initiate chest compressions.
- If no pulse is observed, complete CPR, with assisted breathing and chest compressions, should be commenced.
- If CPR is being performed and the AED arrives to the scene, direct an assistant to begin setting up the AED for operation on the victim. CPR should be continued during the time that the AED is being set up.

[1] PDM-0000009 Horizon Safety Stowing

- If the AED is placed into operation, remain near the victim and follow all AED instructions to ensure safety and proper victim monitoring. Maintain the victim with AED monitoring until trained medical responders arrive at the scene.
- If the victim is responsive but shows signs of shock or has an obvious severe injury, call 911 immediately and take additional actions as described in the sections below.
- If the victim has obvious broken bones or is bleeding profusely or may have neck or spine injuries, do not attempt to move the victim. Make the victim as comfortable as possible and apply pressure to mitigate areas of profuse bleeding until trained medical personnel arrive at the scene.
- Immobilize all injured parts of the victim.
- Prepare victim for transportation, if the victim can be safely moved

Physical Shock

Symptoms

- Pallid face.
- Cool and moist skin.
- Shallow and irregular breathing.
- Perspiration appearing on the victim's upper lip and forehead.
- Increased, but faint pulse rate.
- Nausea.
- Detached semi-conscious attitude towards what is occurring around him/her.

Treatment

- Request professional medical aid immediately.
- Remain with and attempt to calm the victim.

Electric Shock

Symptoms

- Pale bluish skin that is clammy and mottled in appearance.
- Unconsciousness. No indications that the victim is breathing.

Treatment

- Turn off electricity if possible.
- Call for professional medical assistance and an ambulance immediately.
- Remove electric contact from victim with non-conducting material.
- Perform CPR and call for an AED, if required.

Burns

Symptoms

- Deep red color; or
- Blisters; or
- Exposed flesh.

Treatment

- Cool immediately if possible, and
- Free of any jewelry or metal if it is safe to remove it.
- Do not pull away clothing from burned skin tissue.
- Do not apply any ointment to burn area.
- Seek professional medical assistance as soon as possible.

11.0 FIRE RESPONSE PLAN

The Facility will have a Fire Response Plan that will describe measures taken at the Facility to prevent, minimize the severity of, and proactively prepare for the event of a fire emergency. However, if a fire should occur at the Facility, this Fire Response Plan will describe the actions that should be taken by plant personnel. Safe and expedient response actions are essential to protect the health and safety of plant personnel and minimize damages to plant equipment and the surrounding environment.

O&M Field Operations and Safety Personnel will schedule an on-site coordination meeting with local Fire and First Responders to establish expectations, cross train on safety concerns and establish expectations in preparation for a fire. They will discuss access points, personnel points of contact and contact information including O&M OCC. Electrical safety, equipment voltages, currents and arc flash information, safe working distances, electrical isolation with zones of protection as appropriate are to be covered with first responders to ensure safety and develop clear expectation prior to an event.

1. Any person who discovers a fire in the Facility should immediately make radio/phone contact with the Facility Lead Technician, and provide the following information:
    a. That a fire has been discovered.
    b. The location and source of the fire.
    c. Any injuries that have occurred
    d. The cause of the fire (if known)
    e. Actions he/she will be taking to extinguish the fire (if appropriate, in accordance with step 2 of this procedure).

    NOTE: Notifying others of the emergency and getting trained responders on the way is the most important step in minimizing injuries to personnel and damage to equipment. However, if the person discovering a fire would be significantly delayed in attempting to extinguish it in its incipient stage by first getting to a radio to report it, the priority would be to extinguish the fire in the incipient stage. Example: A fire commences in the immediate vicinity of a person who does not have immediate access to a plant radio. If the person can quickly extinguish the fire, he/she should do so first, then get to a radio to report the fire as soon as possible thereafter. If a fire progresses to or is discovered in a state beyond the incipient stage, the immediate action is to notify others over the radio and get help.
2. Any person discovering a fire in its incipient stage should act as quickly as possible to extinguish the fire. In general, a fire should be considered to be in its incipient stage if it meets two primary criteria:
    a. The fire can be extinguished or controlled with a single portable fire extinguisher; and
    b. The person discovering the fire perceives an adequate level of safety in attempting to extinguish the fire.
3. As long as the fire is in its incipient stage, as defined above, the person discovering the fire should utilize all appropriate and readily available fire extinguishing equipment to extinguish the fire. Fire-fighting efforts beyond the incipient stage will be performed by trained outside responders only. (Note: All plant personnel will be provided with initial and periodic refresher training on the types and locations of fire-fighting equipment at the Facility.

4. In response to the fire, the Facility Lead Technician/Lead Technician will need to make the following determinations:
    a. The equipment or activities that need to be shut down and/or ceased.
    b. If any automatic fire suppression systems (if applicable) were activated as a result of the fire, when to secure such systems.

12.0 CHEMICAL OR OIL SPILLS AND RELEASES

The spill or release of any chemical is a potentially serious event, and appropriate response actions must be taken to minimize health hazards to personnel, as well as potential impacts to the environment. It is the policy of the Facility that plant personnel will not respond to spills/releases but will instead call for trained outside responders to perform this function. For the purpose of clarification to plant personnel, the term "respond" in this context refers to actions taken to perform cleanup operations of spilled substances, and in some cases may even take the meaning of actually stopping the source of a spill. Taking basic response actions to a spill such as setting up barricades, placing containment media and stopping spills in situations such as the step 1 example below should not be construed to be acting in the role of a "responder", as it is defined in OSHA HAZWOPER regulations.

The basic actions to be taken in response to a chemical spill or release are the following:

1. If the spill or release is the direct result of an operational action performed on the system from which the release has originated, the person who performed the action should attempt to stop the release (if possible) **if it can be stopped without incurring additional personal exposure to the substance.** An example of this might be the following:

    Example: A person opens the drain valve on a line that results in an unexpected release. If the person can immediately stop the release by closing the valve, this action should be taken if no additional exposure to the chemical will occur by doing so.

2. The person discovering a spill/release should immediately move to a location that is a safe distance from the affected area, but still allows for observation of the affected area (if remaining within observation distance is safe under prevailing conditions; if in doubt, do not risk exposure – leave the area.).
3. The person discovering the spill should look for other personnel in the area and warn them by any means available of the event that has occurred. The Facility Lead Technician/Lead Technician should be notified immediately over the radio. Information provided should include all of the following that are known:
    a. What type of chemical has been spilled/released?
    b. The location(s) of the spill/release.
    c. If the source of the spill/release has been stopped
    d. If any injuries or chemical exposure has occurred to personnel.
    e. Boundaries describing the area of the spill.
    f. Whether or not the spill is contained.
    g. Quantity released.
    h. Environmental Impacts (water bodies, streams, ground, roadways).
4. Based upon the report from the person discovering the spill, the Facility Lead Technician/Lead Technician will evaluate whether the circumstances pose a threat to the

surrounding community or the environment. **If a threat is imposed to the community or environment, 911 should be notified immediately.**

5. The Facility Lead Technician/Lead Technician shall make a determination as to whether the spill or release is of a quantity that must be reported to agencies, and if so, which agencies to notify. To perform this step, the Facility Lead Technician/Lead Technician will use the Spill Prevention Control and Countermeasure Plan (SPCC). The Facility Lead Technician will ensure that all required notifications are made.
6. While remaining at a safe distance from the spill or release, the person discovering the spill should locate and place temporary containment around the outer boundaries of the spill, and place absorbent mats over any plant drains that are near the location of the spill. **This should be performed only if it is safe to do so without risking chemical exposure.**
7. The person discovering the spill should attempt to barricade, restrict access or otherwise mark off safe boundaries around the spill to avert others from inadvertently approaching the spill area. **This should be performed only if it is safe to do so without risking chemical exposure.**
8. The person discovering the spill should remain at a safe distance from the source of the spill/release until additional assistance or instructions are received.
9. Unless the person discovering the spill has reported unsafe conditions for approach of the area, the Facility Lead Technician/Lead Technician will immediately proceed to the spill area to evaluate the severity of the incident. **NOTE: IF ANY PERSONNEL ARE DISCOVERED TO BE UNCONSCIOUS OR OTHERWISE INCAPACITATED UPON APPROACH TO THE SPILL SCENE, ALL PERSONNEL MUST IMMEDIATELY BACK AWAY TO A SAFE DISTANCE FROM THE UNKNOWN THREAT.**
10. The Facility Lead Technician/Lead Technician will evaluate the adequacy of containment, barricades, and any other efforts that have been taken to prevent the spill from migrating to any additional areas or systems, and direct additional actions to be performed (unless it is deemed that any additional actions are unsafe to perform). The adequacy or need for PPE should also be assessed. Upon completing this assessment, the Facility Lead Technician/Lead Technician will notify/inform the Facility Emergency Coordinator of the status of the emergency.
11. Once the Facility Lead Technician/Lead Technician has determined that adequate containment and barricading of the spill area exists, he or she shall ensure that an adequately trained observer remains positioned a safe distance from the scene to observe the status of the spill. This observer shall perform radio status checks a minimum of once every three minutes until outside responders arrive for cleanup/mitigation actions.

ANNEXES

WEATHER EMERGENCY ANNEX

Severe weather can negatively impact the Facility. Events and disturbances that can occur in and around the Facility include, but are not limited to, windstorms, severe thunderstorms, flooding, tornadoes, hurricanes, excessive heat or cold, snowstorms, and ice storms. These weather events can be detrimental to the employees and/or the equipment and structures at the Facility.

Prior to any severe weather event, Personnel will utilize the plans and checklists contained in the weatherization plans to ensure the safety of both personnel and equipment. The information contained herein is supplemental and should be used in conjunction with those plans.

Temperature Design Parameters

The Facility has a design maximum ambient temperature of 100.4 degrees Fahrenheit and a design minimum temperature of 17.6 degrees Fahrenheit.

Event Identification

The West Texas Solar II team will monitor weather through multiple outlets, including National Weather Service alerts, local weather alerts, and regional entity notification distributions. When a weather emergency is identified by the West Texas Solar II team, the appropriate procedure will be put into effect, which includes pre-event and during event checklists to ensure safety and reliability.

Operational Plan for Cold Weather Emergency

The West Texas Solar II Winter Weatherization Plan will include Appendices for both seasonal readiness in accordance with §25.53, and pre-event checklists in accordance with §25.55. West Texas Solar II Personnel will use the Pre-Event Appendix when the Weather Emergency – Cold Weather Emergency is activated. Also included are Appendices related to emergency supplies and post-season lessons learned.

The Pre-event Checklist to be used upon activation of the EOP will be incorporated into the Winter Weatherization Plan and is repeated below for compliance purposes:

Pre-Event Checklist – Winter
Establish communications plan to personnel on winter weather conditions.
Monitor weather and weather alerts.
Place any severe weather protections in service where freezing weather could adversely impact operations or forced outage recovery.
Establish staffing plan (including supplemental coverage).
Note in shift logs when a winter weather advisory has been issued, and subsequently recalled or released.
Monitor room temperature so that instrumentation and equipment in enclosed spaces do not freeze.
Impose appropriate restrictions on maintenance during winter weather advisories.
Update and review emergency callout list.
The Plant Manager or Lead Solar Technician will designate an Emergency Coordinator and discuss the weather forecast at the beginning of each shift during shift turnover, to keep all personnel alerted to possible weather conditions.

Operational Plan for Hot Weather Emergency

The West Texas Solar II Summer Weatherization Plan will include Appendices for both seasonal readiness in accordance with §25.53, and pre-event checklists in accordance with §25.55. West Texas Solar II Personnel will use the Pre-Event Appendix when the Weather Emergency – Hot Weather Emergency is activated. Also included are Appendices related to emergency supplies and post-season lessons learned.

The Pre-event Checklist to be used upon activation of the EOP is incorporated into the Summer Weatherization Plan and is repeated below for compliance purposes:

Pre-Event Checklist – Summer
Request OCC confirmation of any active ERCOT Operational Condition Notices (OCN), Advisories, or Energy Emergency Alerts (EEA).
Confirm personnel awareness with the location and the conditions to activate the Emergency Operations Plan.
The Regional Lead or Lead Solar Technician will discuss the weather forecast at the beginning of each shift with all personnel on site and ensure appropriate hydration, personal cooling systems, and controls on maintenance are established to prevent heat related injuries.
Review site emergency medical procedures for treating heat related injuries.
Establish communication system for lone workers to ensure diagnosis of possible heat related injury.

Personnel Safety

If shelter-in-place is necessary, on-site personnel should seek indoor shelter in the O&M building or substation control room. Personnel should remain indoors if the severe weather is affecting the immediate area of the Facility and maintain communications with the O&M OCC.

Verification of the Adequacy and Operability of Fuel Switching Equipment

This component of the Weather Emergency Annex is not relevant to West Texas Solar Project II because it does not have fuel switching equipment installed.

WATER SHORTAGE ANNEX

Sufficient water will be kept onsite for staff consumption and housekeeping. The Facility does not require process water to operate.

RESTORATION OF SERVICE ANNEX

In the event of a loss of external site power, there is an automatic transfer switch that initiates backup battery power to maintain power to the site control systems. This allows the site to maintain visibility of the site until an O&M representative can perform a site assessment. The target response time for this scenario is two (2) hours after weather or safety conditions permit.

Restoration of service is coordinated between the OCC and ERCOT (via the QSE) using proper protocols to ensure safety and reliability. If remote capability is lost for any reason, the site can be re-energized locally after it is deemed safe to do so.

PANDEMIC AND EPIDEMIC ANNEX

Procedures related to management of a pandemic or epidemic primarily affect the West Texas Solar II Personnel present on site. Procedures to prevent the spread of illness amongst staff physically located on site are tailored to the known transmission mechanisms of the disease. The Generator Operator Compliance Manager is responsible for developing and training the personnel on site for disease-specific transmission protection procedures.

HURRICANE ANNEX

Hurricanes, tropical storms, and other severe weather will be monitored by West Texas Solar II personnel through multiple outlets. Once identified, a storm's progress will be tracked to consider the severity and path of the storm. In the event a hurricane or tropical storm impact is imminent, operational preparations may be taken based on manufacturer design, including wind stow function of modules, reinforcing structures, or site de-energization.

Evacuation

If the Facility Lead Technician determines that an evacuation of the Facility is necessary, he or she must determine which type of evacuation to direct. The following sections describe the types of evacuations that can be performed:

Immediate Site Evacuation

This type of evacuation would be used only in the event of an emergency grave enough to warrant immediate evacuation of all personnel. In this type of evacuation, operating area personnel should evacuate without regard for shutdown of plant systems or for placing plant systems in the safest mode possible. This type of evacuation should only be utilized if the safety of personnel in operating areas is in immediate and severe danger, such that any delay in evacuating could result in deaths or injuries to personnel.

Delayed Site Evacuation

This type of evacuation would be used in a serious emergency situation where non-essential personnel (those not involved in plant operations or emergency coordination) are immediately evacuated as a precaution, and essential personnel remain in operating areas to perform a controlled shutdown of the Facility prior to evacuating. It is anticipated that this would be the primary type of evacuation used in response to serious emergencies at the Facility. The Facility Lead Technician and/or Facility Emergency Coordinator must assess whether the prevailing circumstances warrant keeping essential personnel in plant operating areas to perform a controlled shutdown of the Facility. If personnel will not be exposed to unnecessary danger to perform Facility shutdown and/or place the Facility into a safe condition, then this is the preferred type of evacuation, as opposed to an Immediate Site Evacuation.

*NOTE: AIthough the Facility Lead Technician (or Facility Emergency Coordinator) may initially designate an evacuation to be a Delayed Site Evacuation, he/she should always keep in mind that conditions may change rapidly and may result in the need to call for an Immediate Site Evacuation.

The Facility Lead Technician or Lead Technician onsite will determine if an evacuation is necessary.

Evacuation will be coordinated via the company mobile phones. Teams will be alerted if an evacuation has been directed. If an evacuation has been directed, the Facility Lead

Technician will ensure that instructions for evacuation are communicated to personnel over the plant radio system or hand-held radios. These instructions should include the following items at a minimum:

- The type of evacuation to be performed, whether and Immediate Site Evacuation or a Delayed Site Evacuation
- The nature of the emergency
- The location(s) of the emergency
- Any egress routes that should not be used by evacuating personnel (if known and applicable)

If an evacuation has been ordered, personnel will follow either the Immediate Site Evacuation Procedures or Delayed Site Evacuation Procedures contained in Appendix 4, as appropriate, and based upon the direction of the Facility Lead Technician and/or the Facility Emergency Coordinator.

Immediate Site Evacuation Procedure

1. Personnel present on-site at the O&M Building shall immediately take the following actions:
    a. Locate and obtain the visitor/contractor sign-in sheet.
    b. Locate and obtain all immediately accessible hand-held radios.
    c. Gather at the front entrance gate of the Facility, and determine the safest muster area to proceed to, depending upon the known circumstances of the emergency (as indicated on Appendix 3).

        *NOTE: The primary muster area must be a predetermined location, with any alternate muster areas selected only when egress routes to the primary muster area are unsafe to proceed along.

    d. Pass the following information over the plant radio system:
        i. The muster area the employees will be proceeding to.
        ii. Any visitors or contractors known to be in the operating areas (as indicated by the visitor/contractor sign-in sheet).
    e. Once emergency personnel have completed the preceding steps, they shall immediately proceed to their designated muster area. Personnel on-site should not delay in evacuating or wait on other personnel that they anticipate may arrive.
    f. Upon arriving at the designated muster area, the group shall designate a Person-in-Charge and take a head count of all personnel who are at the muster area, including contractors and visitors.
    g. After a roll call of all personnel present at the muster area is taken, the Person-in-Charge shall identify which operating area personnel are not accounted for. The Person-in-Charge will then query by radio for personnel who are unaccounted for. The Person-in-Charge shall then establish radio communication with the Emergency Coordinator (if applicable) and relay information on personnel who are not accounted for.
    h. All personnel at the muster location shall remain at the muster location until an "ALL CLEAR" signal is sounded, or if directed by the Emergency Coordinator (if

applicable) to leave the muster location. The "ALL CLEAR" signal will be communicated by radio or cellular telephone.

i. The Person-in-Charge shall continuously monitor the plant radio system when at the muster location.

2. Personnel present in the field/substation area (other than the O&M Building) shall immediately perform the following actions:
    a. If not monitoring the plant radio system, immediately turn on hand-held radios.
    b. Proceed to the designated muster area, unless the egress route to the muster area is not safe for travel. In such a case, proceed to an alternate muster area.
    c. Instruct any personnel (including visitors and contractors) who are seen along the way to proceed to the designated muster area.
    d. Upon reaching the appropriate muster area, report to the Person-in-Charge and continue to monitor the plant radio system. If no other personnel are present at the muster area upon arrival, communicate to the Facility Lead Technician that no other personnel are present in the area.
3. Personnel not in the operating areas of the plant (to include the O&M building and parking areas) shall immediately perform the following actions:
    a. Locate and obtain all immediately accessible hand-held radios.
    b. Proceed to the designated muster area.
    c. A Person-in-Charge shall be designated for the muster area. In many cases, this will be the Emergency Coordinator. The Person-in-Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the Facility.
    d. If the Emergency Coordinator is not present at the muster area, the Person-in-Charge at the muster area will coordinate outside responding agency activities until the Emergency Coordinator arrives. In the event that the Emergency Coordinator is in plant operating areas or has proceeded to the alternate muster area, he or she may elect to designate the muster area Person-in-Charge to act in the capacity of Emergency Coordinator during the emergency

Delayed Site Evacuation Procedures

1. Personnel present on-site at the O&M building shall immediately take the following actions:
    a. Take necessary operating actions to place the Facility in the most stable condition, based upon the type of emergency.
    b. Locate and obtain the visitor/contractor sign-in sheet
    c. Communicate the names of visitors and contractors currently in the operating areas to outside operating personnel. Instruct outside operating personnel to locate and direct all visitors and contractors to proceed to the Administrative Building for egress instructions.
    d. When all visitors, contractors and non-essential operating personnel have been accounted for and are present in the O&M building, the Facility Lead Technician or

Emergency Coordinator, as appropriate, shall designate a trained person to escort all non-essential personnel to the designated muster area along the safest egress route.

e. Notify the Emergency Coordinator of the current Facility status and evacuation details.

f. Perform a controlled shutdown in accordance with appropriate procedures and directions from the Emergency Coordinator.

g. Once the shutdown has been completed, all essential personnel shall gather in the O&M building and take roll call. When all essential operating personnel are present and accounted for, evacuation to the designated muster area shall be performed, unless the egress route is not safe for travel. In such a case, proceed to the alternate muster area.

2. Personnel present in the field or substation areas (other than the O&M building) shall immediately perform the following actions:

   a. Continuously monitor the radio system for information and instructions.

   b. Perform immediate response actions, as appropriate, to place the Facility in the most stable condition, based upon the type of emergency.

   c. Locate and direct non-essential personnel to proceed to the O&M building immediately.

   d. Perform Facility shutdown instructions as directed by the Facility Lead Technician/Lead Technician.

   e. Upon completion of shutdown, or upon direction by the Emergency Coordinator, proceed to the muster point for instructions.

3. Personnel not in the operating areas of the Facility (to include the O&M building and parking areas) shall immediately perform the following actions:

   a. Locate and obtain all immediately accessible hand-held radios.

   b. Proceed to the designated muster area (see Site Map).

   c. A Person-in-Charge shall be designated for the muster area. The Person-in- Charge shall establish radio communications with operating area personnel and compare roll call lists to determine if any personnel are unaccounted for in the Facility.

   d. The Person-in-Charge at the designated muster area will coordinate outside responding agency activities and provide assistance (to include personnel, resources, and administrative functions) to the O&M building as directed by the Emergency Coordinator and/or Facility Lead Technician/Lead Technician.

4. The Emergency Coordinator shall immediately perform the following actions:

   a. Proceed to the O&M building or to the location on the Facility most appropriate for directing response actions for the emergency.

   b. Coordinate actions related to the emergency and provide directions to the muster area.

5. Persons-in-Charge

a. If the emergency escalates in severity or presents an immediate danger to personnel, direct an immediate evacuation of all essential operating personnel involved in plant shutdown activities.

Designated Egress Routes and Muster Areas for Evacuations

- The Designated Muster Area is the primary gathering point for personnel and should be used during evacuations unless the emergency has rendered egress routes to the Designated Muster Area unsafe for travel.
- The Alternate Muster Area is the alternate gathering point for such circumstances.
- The alternate muster location will be communicated at the time of evacuation and will take into consideration the event occurring that is causing the evacuation

Primary Muster Area	Will be specified prior to the start of operations
Alternate Muster Area	Will be specified prior to the start of operations

Re-Entry Procedures

Facility personnel will review site re-entry procedures with the Facility Lead. Facility personnel should tour the site grounds to observe possible hazards including:

- Compromised O&M Building integrity
- Compromised Substation control room integrity
- Panels pulled from tracker racking from wind forces
- Foreign debris washed against the fenceline
- Water-driven erosion of site roads, substation grade, or inverter pads

CYBERSECURITY ANNEX

Cybersecurity is managed according to the NERC CIP procedures administered by the Generator Owner Compliance Manager. The Generator Owner Compliance program includes administered network security, including firewall monitoring, VPN controls, and network security. West Texas Solar II Personnel will receive separate training on the NERC procedure. Additionally, the Generator Operator Compliance Manager will provide additional training on the use of transient cyber assets.

PHYSICAL SECUIRTY ANNEX

Objectives for Physical Security Controls

West Texas Solar II has selected a set of operational, procedural and technical security controls to control physical access, based on its need, to both:

a. The asset or locations of its low impact BES Cyber Systems within the asset at the Facility; and

b. The documented electronic access controls specified in its *Electronic Access Controls Plan.*

Facility Physical Security Controls

West Texas Solar II employs the following site perimeter controls.

a. A clearly identifiable physical perimeter surrounds the Facility or Facilities.

b. The perimeter fencing has posted "Danger - High Voltage, Keep Out" signage.

c. Gates in the perimeter fencing are kept locked.

West Texas Solar II employs the following procedural controls.

a. Personnel are expected to, at a minimum:

- Notify the O&M OCC prior to entering the substation control building and receive permission to enter;
- Only enter areas they have authorization to enter;
- Close and lock gates, doors, and cabinets behind them, as appropriate; and
- Report suspicious activity.

All electronic access controls for West Texas Solar II's low impact BES Cyber Systems are contained within the substation control building or in cabinets with bolted doors within the Facility perimeter.

West Texas Solar II employs the following physical access controls.

d. The following physical access controls are employed at the substation control building:

- Door contacts that are alarmed via SCADA;
- Lock to the substation yard;
- Lock to the substation house.

e. The following access controls are employed at the O&M building:

- Lock to the O&M building