



## Filing Receipt

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**PROJECT NO. 53385**

<b>PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53</b>	<b>§ § § §</b>	<b>PUBLIC UTILITY COMMISSION    OF TEXAS</b>
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**MOUNTAIN CREEK POWER, LLC'S EMERGENCY OPERATIONS PLAN  
EXECUTIVE SUMMARY**

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, Mountain Creek Power, LLC ("Mountain Creek") hereby files an executive summary of its Emergency Operations Plan (the "Plan"), which describes the contents and policies contained in the Plan, includes references to specific sections and page numbers of the Plan that correspond with the requirements of 16 TAC § 25.53, includes the Plan's record of distribution, and attaches the required affidavit and a redacted copy of the Plan. Mountain Creek is registered with the Public Utility Commission of Texas as a power generation company.

**A. Contents and Policies (16 TAC § 25.53(c)(1)(A)(i)(I))**

Attachment A to this Executive Summary is a redacted copy of Mountain Creek's Emergency Operations Plan. The purpose of the Plan is to specify the recommended and/or required steps to be taken in response to various emergency conditions and incidents. The Plan addresses reasonably foreseeable emergency conditions for the Mountain Creek power generation facility and applies to facility personnel, management, and relevant contractors.

The Plan contains the following sections:

<b>Content/Policies</b>	<b>Plan Reference</b>
General Facility Information	Section 1, page 1
Emergency Response Contacts	Section 2, pages 1-2
Purpose	Section 3, page 3
Scope	Section 4, page 3
Responsibilities	Section 5, page 3
Legal Requirements	Section 6, page 3
Approval and Implementation	Section 7, pages 3-4

<b>Content/Policies</b>	<b>Plan Reference</b>
Emergency Communication Plan	Section 8, page 4
Distribution and Training	Section 9, page 5
Drills	Section 10, page 5
Supplies for an Emergency	Section 11, page 5
General Staffing During an Emergency	Section 12, pages 5-6
Identification of Weather-Related Hazards	Section 13, page 6
Weather Emergency Plan – Extreme Cold	Section 14.1.1, pages 6-8
Weather Emergency Plan – Extreme Heat	Section 14.1.2, page 8
Weather Emergency Plan – Tornado	Section 14.1.3, pages 8-9
Water Shortage Annex	Section 14.2, page 9
Restoration of Service Annex	Section 14.3, pages 9-10
Pandemic and Epidemic Annex	Section 14.4, pages 10-12
Cyber Security Annex	Section 14.6, pages 12-13
Physical Security Annex	Section 14.7, pages 13-20
Plant Hazard Annex	Section 14.8, pages 20-24
Revision History	Appendix A, page 25
Distribution List and Training Record	Appendix B, page 26
Designated Individuals	Appendix C, page 27
Emergency Contacts	Appendix D, page 28
Primary and Contingency Personnel	Appendix E, page 29
Site Map & Evacuation Areas	Appendix F, page 30
Return to Normal Operations	Appendix G, page 31

**B. Record of Distribution (16 TAC §§ 25.53(c)(1)(A)(i)(III) and 25.53(c)(4)(A))**

All on-site personnel received a copy of the updated Mountain Creek Plan on April 13, 2022. The required record of distribution is included as Appendix B to the Plan, and a non-redacted version of the record of distribution will be made available to Commission Staff upon request.

**C. Affidavit (16 TAC §§ 25.53(c)(1)(A)(i)(IV) and 25.53(c)(4)(C))**

Attachment B to this Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

**D. Emergency Contact List (16 TAC § 25.53(c)(4)(B))**

Section 2 and Appendix D of the Plan is the emergency contact list required by 16 TAC § 25.53(c)(4)(B).

The primary and backup emergency contact information for Mountain Creek who can immediately address urgent requests and questions from the Commission during an emergency has been updated in the Public Utility Commission of Texas Portal for Mountain Creek as of April 13, 2022.

**E. Common Operational Functions Relevant Across Emergency Types (16 TAC § 25.53(d))**

In addition to those items explicitly listed in 16 TAC § 25.53, the Plan addresses common operational functions relevant across emergency types, including:

<b>Content/Policies</b>	<b>Plan Reference</b>
General Facility Information	Section 1, page 1
Emergency Response Contacts	Section 2, pages 1-2
Purpose	Section 3, page 3
Scope	Section 4, page 3
Responsibilities	Section 5, page 3
Legal Requirements	Section 6, page 3
Distribution and Training	Section 9, page 5
Drills	Section 10, page 5
Primary and Contingency Personnel	Appendix E, page 29
Site Map & Evacuation Areas	Appendix F, page 30
Return to Normal Operations	Appendix G, page 31

**F. Approval and Implementation (16 TAC § 25.53(d)(1))**

Mountain Creek's Plan includes approval and implementation policies and procedures as outlined in the following table:

<b>Content/Policies</b>	<b>Plan Reference</b>	<b>Rule Reference</b>
Introduction of Plan and outline of its applicability	Purpose, Section 3, page 3 Scope, Section 4, page 3 Responsibilities, Section 5, page 3 Legal Requirements, Section 6, page 3 Approval and Implementation, Section 7, pages 3-4	16 TAC § 25.53(d)(1)(A)
List of individuals responsible for maintaining and implementing the Plan, and those who can change the Plan	Responsibilities, Section 5, page 3 Approval and Implementation, Section 7, pages 3-4	16 TAC § 25.53(d)(1)(B)
Revision control summary that lists the dates of each change made to the Plan since the initial Plan was adopted	Revision History, Appendix A, page 25	16 TAC § 25.53(d)(1)(C)
Dated statement that the current Plan supersedes previous plans	Approval and Implementation, Section 7, pages 3-4 Publication date in header	16 TAC § 25.53(d)(1)(D)
Date the Plan was most recently approved by Mountain Creek	Publication date in header	16 TAC § 25.53(d)(1)(E)

**G. Communication Plan (16 TAC § 25.53(d)(2)(B))**

Mountain Creek's procedures during an emergency for communicating with the media; the Public Utility Commission of Texas; Office of Public Utility Counsel; fuel suppliers; local and state governmental entities, officials, and emergency operations centers, as appropriate in the circumstances for the entity; and the applicable reliability coordinator are contained in the Emergency Communications Plan, Section 8, page 4. The following sections of the Plan also address emergency communications:

<b>Content/Policies</b>	<b>Plan Reference</b>
Emergency Response Contacts	Section 2, pages 1-2
Designated Individuals	Section 5.2, page 3 Appendix C, page 27
Emergency Contacts	Appendix D, page 28

#### **H. Emergency Supply Plan (16 TAC § 25.53(d)(3))**

Section 11, page 5 describes Mountain Creek's plan to maintain pre-identified supplies for emergency response.

#### **I. Emergency Staffing Plan (§ 25.53(d)(4))**

Section 12, pages 5-6 describes Mountain Creek's plan to address staffing during an emergency response.

#### **J. Weather Related Hazards (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(A))**

Sections 13 and 14, pages 6-12 include Mountain Creek's plans for monitoring and responding to severe weather as outlined below:

<b>Content/Policies</b>	<b>Plan Reference</b>	<b>Rule Reference</b>
Extreme Cold, including <ul style="list-style-type: none"> <li>operational plans for responding to a cold weather emergency distinct from the weather preparations required under 16 TAC § 25.55 and</li> <li>checklist for generation resource personnel to use during a cold weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency</li> </ul>	Section 13, page 6 Section 14.1.1, pages 6-8	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)

<b>Content/Policies</b>	<b>Plan Reference</b>	<b>Rule Reference</b>
Extreme Heat, including <ul style="list-style-type: none"> <li>operational plans for responding to a hot weather emergency distinct from the weather preparations required under 16 TAC § 25.55</li> <li>checklist for generation resource personnel to use during a hot weather emergency that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency</li> </ul>	Section 13, page 6 Section 14.1.2, page 8	16 TAC § 25.53(d)(5) 16 TAC § 25.53(e)(2)(A) 16 TAC § 25.53(e)(2)(A)(i) 16 TAC § 25.53(e)(2)(A)(iii)
Tornado	Section 13, page 6 Section 14.1.3, pages 8-9	16 TAC § 25.53(d)(5)

As stated in Section 14.1.1.2, the Plan does not include a verification of the adequacy and operability of fuel switching equipment because the Mountain Creek facility does not support fuel switching. Therefore, 16 TAC § 25.53(e)(2)(A)(ii) requiring verification of the adequacy and operability of fuel switching equipment does not apply to Mountain Creek.

**K. Water Shortage (16 TAC § 25.53(e)(2)(B))**

Section 14.2, page 9 contains Mountain Creek’s plan to address supply shortages of water used in the generation of electricity.

**L. Restoration of Service (16 TAC § 25.53(e)(2)(C))**

Section 14.3, pages 9-10 identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat. Additionally, Appendix G to the Plan addresses return to normal operations.

**M. Pandemic and Epidemic (16 TAC § 25.53(e)(2)(D))**

Section 14.4, pages 10-12 addresses Mountain Creek's pandemic and epidemic emergency response plan.

**N. Hurricane (16 TAC §§ 25.53(d)(5) and 25.53(e)(2)(E))**

As stated in Section 14.5, page 12, to the best of Mountain Creek's knowledge its facility is not in a Texas Department of Emergency Management designated hurricane evacuation zone. Therefore, 16 TAC § 25.53(d)(5) requiring a plan that addresses how an entity identifies hurricanes and 16 TAC § 25.53(e)(2)(E) requiring a hurricane annex do not apply to Mountain Creek.

**O. Cyber Security (16 TAC § 25.53(e)(2)(F))**

Section 14.6, pages 12-13 contains Mountain Creek's cyber security annex.

**P. Physical Security Incident (16 TAC § 25.53(e)(2)(G))**

Section 14.7, pages 13-20 contains Mountain Creek's physical security annex as outlined below:

<b>Content/Policies</b>	<b>Plan Reference</b>
Sabotage	Section 14.7.1, pages 13-16
Bomb Threat	Section 14.7.2, pages 16-18
Active Shooter	Section 14.7.3, pages 18-20

**Q. Appropriate Additional Annexes (16 TAC § 25.53(e)(2)(H))**

Section 14.8, pages 20-24 contains Mountain Creek's plant hazard annex, which includes additional policies and procedures appropriate for the Mountain Creek facilities:

<b>Content/Policies</b>	<b>Plan Reference</b>
Facility Fire	Section 14.8.1, pages 20-22
Sudden Loss of Power	Section 14.8.2, page 22
Catastrophic Equipment Failure	Section 14.8.3, pages 22-23
Chemical Release	Section 14.8.4, pages 23-24
Gas Leak	Section 14.8.5, page 24



**R. Drills (16 TAC § 25.53(f))**

Mountain Creek plans to conduct a drill on the recently revised Plan by June 30, 2022. Mountain Creek will file a supplement in this docket upon completion of the 2022 drill.

April 14, 2022

Respectfully Submitted,

/s/ Daniel Booth  
Daniel Booth  
Chief Operating Officer  
Mountain Creek Power, LLC

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# **Mountain Creek Power, LLC**

## **Emergency Operations Plan**

### **Version 1.0**

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## 1 General Facility Information

FACILITY NAME: Mountain Creek Power Plant  
 FACILITY PHONE: [REDACTED]  
 FACILITY LOCATION: [REDACTED]  
 FACILITY OPERATOR: [REDACTED]  
 FACILITY MANAGER: [REDACTED]

## 2 Emergency Response Contacts

### Internal Emergency Numbers:

Control Room	[REDACTED]
Primary ERC: Facility Manager,	[REDACTED]
Backup ERC: Operations Manager,	[REDACTED]
Owner's ER Rep: [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

### Cellular Numbers:

Primary ERC: Facility Manager,	[REDACTED]
Backup ERC: Operations Manager,	[REDACTED]
Owner's ER Rep: [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

### Outside Responder Numbers:

Dallas County Sheriff (non-emergency)	(214) 749-8641
General Emergency	911
Fire/Ambulance	911
Fire Local Number	(214) 670-4610
Fire Local Fire Chief, Robert De Los Santos	(214) 653-7970
Dallas County Office of Emergency Management – Doug Bass	(214) 653-6952
Management Coordinator	(817) 501-3409
City of Dallas Emergency Management Travis Houston, Emergency Management Coord.	(214) 670-4275
Urgent Care Facility	

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Concentra (open 8am – 5pm) (214) 467-8210  
5520 S Westmoreland Road, Suite 200  
Dallas, TX 75237

After Hours Clinic  
Surepoint ER Grand Prairie (214) 518-6055  
901 W Jefferson Street  
Grand Prairie, TX 75051

Hospital Emergency Room  
Methodist Dallas Medical Center (214) 947-8181  
1441 North Beckley Avenue  
Dallas, TX 75203

Federal Bureau of Investigation – Houston (713) 693-5000

**Regulatory Agency Numbers:**

TCEQ Emergency Release Hotline (800) 832-8224

National Response Center (only if spill leaves the property) (800) 424-8802

TCEQ Region 4 Air Upset Reporting (by fax) (817) 588-5702

OSHA – Region 6 – Dallas Office (972) 952-1330

Chemtrec (for information on hazardous materials) (800) 424-9300

OPUC Main Number (512) 936-7500

PUCT Main Number (512) 936-7000

PUCT Emergency Contact #1 – [REDACTED]  
Office [REDACTED]  
Cell [REDACTED]

PUCT Emergency Contact #2 – [REDACTED]  
Office [REDACTED]  
Cell [REDACTED]

PUCT Emergency Contact #3 – [REDACTED]  
Office [REDACTED]  
Cell [REDACTED]

ERCOT Via QSE

**Customer and Neighbor Numbers:**

Oncor Transmission Grid Operations (214) 743-6670

**Spill Response and Cleanup Contractor:**

SET Environmental, Inc. - 24-hour Hotline (877) 437-7455

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### 3 Purpose

The purpose of this Emergency Operations Plan (“EOP”) is to specify the recommended and/or required steps to be taken in response to various emergency conditions and incidents.

### 4 Scope

This EOP addresses reasonably foreseeable emergency conditions for the Colorado Bend I Power, LLC power generation facility (the “Facility”). It applies to Facility’s personnel, management, and relevant contractors.

### 5 Responsibilities

#### 5.1 General Responsibilities

The Plant Manager is the owner of this document and collection of procedures and as such is responsible for maintaining and updating this procedure.

The Plant Manager is responsible for assuring completion of actions needed to provide safety for plant personnel and equipment.

The Operations Manager shall ensure that the necessary steps to maintain site personnel safety and to protect assets are adhered to.

The Lead Operations and Maintenance Technician in charge of shift is responsible for the implementation of these procedures and may direct any qualified person to perform any task associated with such procedures.

All plant personnel, as directed by the Lead Operations and Maintenance Technician in charge of shift, are responsible for performance of steps in these procedures.

#### 5.2 Designated Individuals

The following individuals are designated to interact with local, state, and federal emergency management officials during emergency as listed in Appendix C.

### 6 Legal Requirements

All Facility personnel shall adhere to all applicable laws and regulations at all times in connection with an emergency event governed by this EOP.

### 7 Approval and Implementation

(A) This EOP governs the approved steps and actions to be taken by Facility personnel before, during, and after an emergency event. It applies to all relevant Facility personnel.

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(B) The EOP will be continuously maintained. The individuals responsible for maintaining and implementing the EOP, and those who can change the EOP, are identified above in section 5. The EOP shall be reviewed annually by the Plant Manager and may be revised based on changes to federal, state, or local regulations and requirements. Additionally, following an annual drill or event of emergency, the Plant Manager must assess the effectiveness of the emergency response and revise the EOP as needed.

(C) A revision control summary that lists the dates of each change made to the EOP is provided in Appendix A.

(D) This EOP supersedes previous EOPs associated with the Facility.

(E) The EOP was most recently reviewed and approved by the appropriate executives on the date specified in the header.

## 8 Emergency Communication Plan

Communications during an emergency shall be completed as follows:

Third Party	Plan and Procedure
Media	[REDACTED]
Fuel Suppliers	[REDACTED]
Local and state governmental entities, officials, and emergency operations centers	[REDACTED]
OPUC	[REDACTED]
Reliability Coordinator (ERCOT)	[REDACTED] [REDACTED]

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## 9 Distribution and Training

- (A) A record of distribution of and training on this EOP is provided in Appendix B.
- (B) The individuals who are designated to interact with local, state, and federal emergency management officials during an emergency are listed in Appendix C. These individuals must have taken the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

## 10 Drills

The Facility shall conduct, at least annually, a reasonably appropriate operations-based exercise that is a coordinated, supervised activity employed to test relevant portions of this EOP. A drill may be used to develop or test new policies or procedures or to practice and maintain current skills.

Because the Facility is not believed to be in a hurricane evacuation zone, the drill need not include hurricane preparedness. Such efforts will remain at the sole discretion of the Plant Manager.

At least 30 days prior to the date of at least one drill each calendar year, the Facility shall notify the Public Utility Commission of Texas (PUCT) staff, using the method and form prescribed by PUCT staff on the PUCT's website, and the appropriate Texas Division of Emergency Management District Coordinators, by email or other written form, of the date, time, and location of the drill.

If the Facility has activated its EOP in response to an emergency, it is not required to conduct or participate in a drill in the calendar year in which the EOP was activated.

## 11 Supplies for an Emergency

Facility staff should review this EOP and identify the necessary steps for procuring supplies for all relevant emergency situations. On a regular basis, staff should review emergency supplies for both appropriate size of inventory as well as fit for purpose.

Some of the emergency annexes provide a specified minimum amount of supplies needed. The Plant Manager has the authority to obtain materials above these stated minimums should they deem it preferable.

## 12 General Staffing During an Emergency

In a non-emergency situation, the facility should always be properly staffed to safely operate. When sudden emergencies present themselves, the staff on-hand should be trained to respond appropriately.

For emergencies that do not present themselves in a sudden manner and/or require longer-term emergency staffing, the individual annexes provide guidance on managing personnel during an



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event. At all times, the Plant Manager has the authority in an emergency situation to redeploy staff as necessary to maximize and/or maintain the safe operation of the plant.

### 13 Identification of Weather-Related Hazards

The Facility shall identify weather related hazards in a manner consistent with the procedures outlined in the relevant Weather Emergency Annex (section 14.1).

### 14 Emergency Event Annexes

#### 14.1 Weather Emergency Annex

This section includes procedures specific to a range of possible weather-based emergencies.

##### *14.1.1 Weather Emergency Plan – Extreme Cold*

###### *14.1.1.1 Situation-Specific Definitions*

Typical Winter Conditions – Winter conditions typical to South Texas. For the purpose of this procedure typical winter conditions presume daily high temperatures around the 40 to 50 degree Fahrenheit range with freezing temperatures overnight in the 30 to 40 degrees Fahrenheit range.

Extreme Temperature Excursions – Ambient conditions in which the overnight low temperatures will drop below 30 degrees Fahrenheit or extended period of time (8 hours or more) at or below conditions where daily high temperatures will not rise above the freezing point of water.

Temporary Freeze Protection – Any material or equipment meant for temporarily providing additional insulation or additional heat input to maintain water in a liquid state during freezing ambient conditions.

###### *14.1.1.2 Emergency Procedure – Extreme Cold*

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

- **Checklist:**



- 

- **Checklist:**



- **Checklist:**



- ☐ [REDACTED]
- ☐ [REDACTED]

#### ***14.1.2 Weather Emergency Plan – Extreme Heat***

##### ***14.1.2.1 Situation-Specific Definitions***

Extreme Heat Conditions – Ambient conditions in which the peak temperature increases above a temperature of 110 degrees Fahrenheit.

##### ***14.1.2.2 Emergency Procedure – Extreme Heat***

In the event of extreme heat, a visual facility inspection should be undertaken prior to the arrival of the heat wave to minimize the risk of equipment failure.

The following is a checklist [REDACTED]

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

[REDACTED]

#### ***14.1.3 Weather Emergency – Tornado***

##### ***14.1.3.1 Situation-Specific Definitions***

Tornado Watch – Weather conditions that could produce or have the potential of Tornadoes in your area in the next 36 hrs.

Tornado Warning – Weather conditions that have produced Tornadoes and are expected in your area in the next 24 hrs.

##### ***14.1.3.2 Identifying Tornado Hazards***

[REDACTED]

#### *14.1.3.3 Emergency Procedure – Tornado Activity*

[REDACTED]

[REDACTED]

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

#### **14.2 Water Shortage Annex**

[REDACTED]

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

#### **14.3 Restoration of Service Annex**

[REDACTED]

☐ [REDACTED]

☐ [REDACTED]

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#### **14.4 Pandemic and Epidemic Annex**

This section provides for the continuation of critical functions at the site in the event of a pandemic virus. It defines appropriate steps which the site may be required to take to safely manage site functions and personnel during any pandemic illness event that could disrupt staffing and critical functions. It provides for contingencies to avert or mitigate disasters and damage that may be caused by high levels of absenteeism and disruption of critical supply chains, and for quick recovery after the event.

##### ***14.4.1 Situation-Specific Definitions***

World Health Organization (WHO) – A specialized agency of the United Nations responsible for international public health.

Center for Disease Control (CDC) – The national public health agency of the United States.

WHO Pandemic Alert Phase 1 – An inter-pandemic period defined by no new influenza virus subtypes detected in humans. An influenza virus subtype that has caused human infection may be present in animals. If present in animals, the risk of human disease is considered to be low.

WHO Pandemic Alert Phase 2 – An inter-pandemic period defined by no new influenza virus subtypes detected in humans. However, a circulating animal influenza virus subtype poses a substantial risk of human disease.

WHO Pandemic Alert Phase 3 – A pandemic alert period defined by human infection(s) with a new subtype, but no human-to-human spread, or at most rare instances of spread to a close contact.

WHO Pandemic Alert Phase 4 – A pandemic alert period defined by small cluster(s) with limited human-to-human transmission but spread is highly localized, suggesting that the virus is not well adapted to humans.

WHO Pandemic Alert Phase 5 – A pandemic alert period defined by 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).

WHO Pandemic Alert Phase 6 – The highest level pandemic phase defined by increased and sustained transmission in general population.

##### ***14.4.2 Inter-Pandemic Phases Action Plan***

[REDACTED]

[REDACTED]

[REDACTED]

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

#### *14.4.3 Emergency Procedure – Pandemic Phase 3 and Phase 4*

[REDACTED]

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

#### *14.4.4 Emergency Procedure – Pandemic Phase 5*

[REDACTED]

- [REDACTED]
- [REDACTED]

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

#### *14.4.5 Emergency Procedure – Pandemic Phase 6*

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

### **14.5 Hurricane Annex**

The Mountain Creek facility is believed to be outside of the Texas Department of Emergency Management designated evacuation zones. As such, the plant does not keep hurricane-specific preparedness plans on file.

### **14.6 Cyber Security Annex**

#### *14.6.1 Situation-Specific Definitions*

Attempted Cyber Intrusion – A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success

[REDACTED]

Unauthorized modification – Unauthorized addition or modification of software or data associated with the proper operation of cyber assets

#### ***14.6.2 Emergency Procedure – Cyber Security Incident***

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]

### **14.7 Physical Security Annex**

This section includes procedures specific to a range of possible emergencies caused by breaches of security at the plant.

Electric generating facilities are important to local infrastructure including telecommunications, transportation, banking and finance, law enforcement, emergency services, and industry. As such, this facility will make every effort to recognize and report applicable cyber/physical threats and incidents to the appropriate authorities.

#### ***14.7.1 Sabotage***

##### ***14.7.1.1 Situation-Specific Definitions***

Sabotage – Generally considered motivated behavior intended to create disruptions in a work or social environment. It is often the work of enemy agents or disgruntled employees and can be the work of a single saboteur or a group. Sabotage generally includes destruction of property or obstruction of normal operations. Sabotage attempts are often tied to disruptive events in the work place such as possible threats to industry or region and labor unrest. Civil unrest can result in attempted sabotage where a specific group's cause may conflict with organizational, governmental or industry goals.

##### ***14.7.1.2 Recognizing Sabotage***



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[REDACTED]

[REDACTED]

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

#### 14.7.1.3 Sabotage Response

[REDACTED]

1. [REDACTED]
2. [REDACTED]
  - a. [REDACTED]
  - b. [REDACTED]
  - c. [REDACTED]
  - d. [REDACTED]
  - e. [REDACTED]
  - f. [REDACTED]
  - g. [REDACTED]
  - h. [REDACTED]
  - i. [REDACTED]
  - j. [REDACTED]

3.

a.

b.

#### ***14.7.2 Physical Security Emergency Plan – Bomb Threat***

##### ***14.7.2.1 Emergency Procedure – Handling a Bomb Threat Call***

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

##### ***14.7.2.2 Emergency Procedure – Bomb Threat Response***

[REDACTED]

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[REDACTED]

- [REDACTED]

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

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

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

[REDACTED]

- [REDACTED]

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- [REDACTED]

[REDACTED]

[REDACTED]

**14.7.3 Active Shooter**

*14.7.3.1 Emergency Procedure - Active Shooter*

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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

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

[REDACTED]

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

[REDACTED]

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

[REDACTED]

*14.7.3.2 Rooms Which Can Be Locked at the Facility*

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

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

## 14.8 Plant Hazard Annex

### 14.8.1 Facility Fire

#### 14.8.1.1 Situation-Specific Definitions

Incipient Stage Fire – A fire where the progression is in the early stage and has not developed beyond that which can be extinguished using portable fire extinguishers or a small fire hose system flowing up to 125 gpm. A fire is considered beyond the incipient stage when the use of protective clothing or self-contained breathing apparatus (SCBA) is required or an individual is required to crawl on the ground or floor to stay below smoke and heat.

Major Fire – Any fire that has progressed beyond the incipient stage.

#### 14.8.1.2 Indications of a Major Fire

[REDACTED]

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

#### 14.8.1.3 Emergency Procedure - Major Fire

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]

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6. [REDACTED]
- [REDACTED]
7. [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
- [REDACTED]
  - [REDACTED]
  - [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]
16. [REDACTED]
17. [REDACTED]



18. [REDACTED]
19. [REDACTED]

#### ***14.8.2 Sudden Loss of Power***

##### ***14.8.2.1 Emergency Procedure – Sudden Loss of Power***

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
  - a. [REDACTED]
  - b. [REDACTED]
  - c. [REDACTED]
  - d. [REDACTED]
  - e. [REDACTED]
  - f. [REDACTED]
10. [REDACTED]
  - a. [REDACTED]
  - b. [REDACTED]
  - c. [REDACTED]
11. [REDACTED]

#### ***14.8.3 Catastrophic Equipment Failure***

##### ***14.8.3.1 Emergency Procedure – Catastrophic Equipment Failure***

1. [REDACTED]

2. [REDACTED]
  - a. [REDACTED]
  - b. [REDACTED]
  - c. [REDACTED]
  - d. [REDACTED]
  - e. [REDACTED]
  - f. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]

#### ***14.8.4 Chemical Release***

##### ***14.8.4.1 Emergency Procedure – Chemical Release***

- [REDACTED]
1. [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
    - [REDACTED]
  2. [REDACTED]
  3. [REDACTED]
  4. [REDACTED]
  5. [REDACTED]

6. [REDACTED]

#### **14.8.5 Gas Leak**

##### *14.8.5.1 Emergency Procedure – Gas Leak*

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
  - a. [REDACTED]
  - b. [REDACTED]
  - c. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]

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### APPENDIX A (Revision History)

Version	Date	Summary of Changes
1.0	4/11/2022	Initial Version

## APPENDIX B (Distribution List)

[illegible]

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### **APPENDIX C (Designated Individuals)**

The following individuals are designated to interact with local, state, and federal emergency management officials during emergency

<b>Name</b>	<b>Title</b>

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## APPENDIX D (Emergency Contacts)

The following individuals are designated as Emergency Contacts with the PUCT

Name	Title	Main	Cell	Email
[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]	[REDACTED]

## APPENDIX E (Primary and Contingency Personnel)

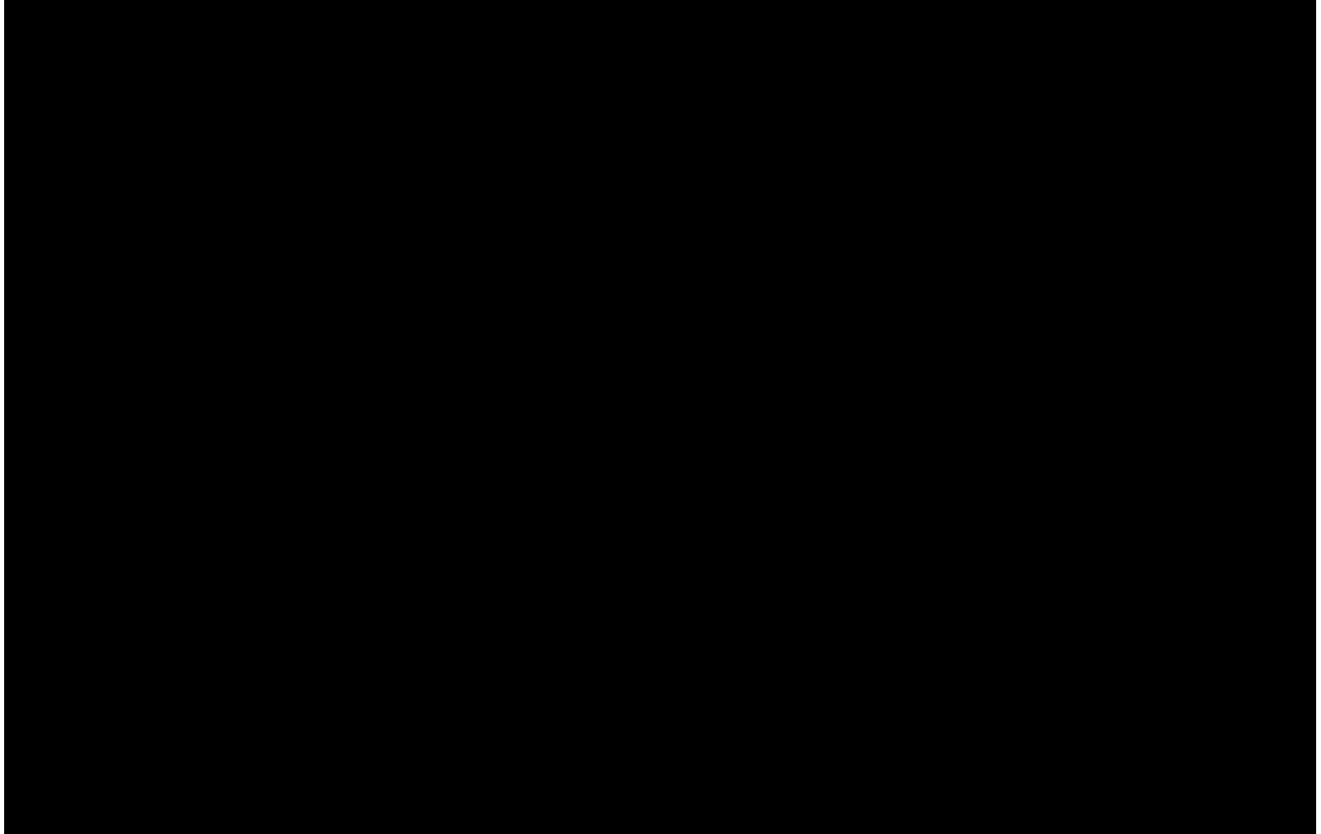
The following table identifies critical personnel, skills, and secondary personnel who have requisite knowledge and experience to fill the primary individual's critical duties.

Job Title	Primary Employee	Able to Remain onsite?	Secondary Employee	Able to Remain onsite?	Essential skills
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



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## **APPENDIX F (Site Map & Evacuation Areas)**



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**APPENDIX G (Return to Normal Operations)**

- [REDACTED]
1. [REDACTED]
  2. [REDACTED]
  3. [REDACTED]
  4. [REDACTED]
  5. [REDACTED]
  6. [REDACTED]

**AFFIDAVIT**

**THE STATE OF TEXAS**

§

§

**COUNTY OF HARRIS**

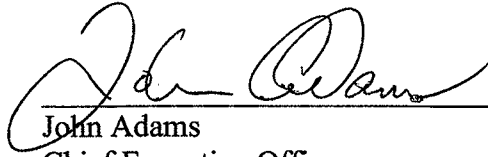
§

BEFORE ME, the undersigned authority, on this day personally appeared John Adams who swore an oath that the following facts are true:


1. My name is John Adams. I am the Chief Executive Officer of Mountain Creek Power, LLC ("Mountain Creek") and the highest-ranking officer with binding authority over Mountain Creek. I am over 18 years of age, of sound mind, and competent and authorized to make this affidavit on behalf of Mountain Creek. I have personal knowledge of the matters described herein.
2. Mountain Creek is registered with the Public Utility Commission of Texas as a power generation company.
3. Mountain Creek has in place an emergency operations plan (the "Plan") in accordance with 16 Texas Administrative Code ("TAC") § 25.53.
4. Immediately upon the new 16 TAC § 25.53 being adopted on February 25, 2022, Mountain Creek began making the necessary revisions to the Plan. The updated Plan was adopted on April 11, 2022.
5. The Plan has been distributed as indicated in Appendix B of the Plan, all relevant operating personnel are familiar with and have received training on the applicable contents and execution of the Plan, and such personnel are instructed to follow the applicable portions of the Plan except to the extent deviations are appropriate as a result of specific circumstances during the course of an emergency.
6. The Plan has been reviewed and approved by the appropriate executives.
7. The short window of time between the effective date of 16 TAC § 25.53 and the deadline for submitting this affidavit did not allow a drill to be conducted on the revised Plan consistent with 16 TAC § 25.53(f). Mountain Creek has a plan to ensure a drill is conducted by June 30, 2022 and will file a supplement in this docket upon completion of its drill.
8. The Plan or an appropriate summary has been distributed to local jurisdictions as needed.
9. Mountain Creek maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
10. The Mountain Creek emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events, as listed in Appendix C of the Plan, have received the latest

IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
John Adams  
Chief Executive Officer  
Mountain Creek Power, LLC

Sworn to and subscribed before me this 13<sup>th</sup> day of April, 2022.

  
\_\_\_\_\_  
Notary Public, State of Texas  
My Commission Expires: 10/22/23

