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EXECUTIVE SUMMARY ACCENT ENERGY TEXAS, LP EMERGENCY OPERATIONS PLAN

Introduction

Accent Energy Texas, LP dba IGS Energy (Accent) is a retail electric provider serving customers in Texas under certificate number 10078 issued by the Public Utility Commission of Texas (PUC). Accent's Emergency Operations Plan (EOP) is provided as required by 16 Texas Administrative Code § 25.53. Included with the Executive Summary are the record of distribution and affidavit required by 16 TAC §§ 25.53(c)(4)(A) and (C), and a list of emergency contacts for Accent, including specific individuals who can immediately address urgent requests and questions from the PUC during an emergency.

Approval and Implementation

The Approval and Implementation section of Accent's EOP describes the purpose of the EOP and outlines its applicability. Included within this section are a list of the personnel responsible for maintaining and implementing the EOP and a list of personnel with the authority to make changes to the EOP. To confirm that the EOP is current, this section also provides a revision control summary that will list of the date of any changes made to the EOP after the initial filing on or before April 18, 2022; a dated statement that the current EOP supersedes previous EOPs; and the date the EOP was most recently approved by the entity.

Reference Pages: 2

Communication

This section of Accent's EOP describes procedures for communicating during an emergency with the public, media, customers, the PUC, and OPUC. It also addresses procedures for handling customer complaints during an emergency.

Reference Pages: 14-15, 37-43

Policies Applicable Across Emergencies

The policies within the EOP applicable across emergencies are designed to identify business process interdependencies; critical applications necessary to support retail electric business processes; and priorities for business continuity activities to enable continued resiliency during a disruptive event or efficient recovery of operations as soon as possible after an event. Regardless of the specific type of threat or hazard, these policies address: (1) the loss of a facility; (2) temporary loss of access to a facility; (3) unavailability of personnel; (4) unavailability of systems; and (5) loss of core suppliers. Included in these policies are a plan to address staffing and maintain pre-identified supplies, the process for activating the EOP, and the process for identifying weather-related hazards.

Reference Pages: 5-13, 16-20

Annexes

Pandemic and Epidemic. This annex addresses human resources disruptions, including

social distancing at the office, working from home, suspension of non-essential business travel, etc. To supplement this annex, Accent relies on information from public health authorities.

Reference Pages: 35

Hurricane. This annex is not applicable to Accent because it does not have any

offices or other facilities located in a Hurricane Evacuation Zone in

Texas.

Cyber Security. This annex describes the mission and responsibilities of the Cyber

Incident Response Team. It is designed to manage and mitigate the effects of a cyber incident by establishing procedures for identifying, containing, and eliminating a threat and recovering IT

services quickly and securely.

Reference Pages: 25-26, 34, 44-84

Physical Security and Incident. This annex addresses the physical safety of Accent's

facilities and procedures for using an alternate, recovery

workspace if normal facilities are unavailable.

Reference Pages: 22, 32-33, 85-95

AFFIDAVIT

State of Ohio County of Franklin

Before me, the undersigned authority, personally appeared Matthew White, who, being by me duly sworn, deposed as follows:

- 1. My name is Matthew White. I am of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.
- 2. I am currently employed as Chief Legal Officer of Accent Energy Texas, LP (Accent). In this position, I have binding authority over Accent Energy Texas, LP (Accent).
- 3. Accent is an Option I retail electric provider operating under Public Utility Commission of Texas certificate number 10078.
- 4. This affidavit is submitted as part of the Executive Summary of the Emergency Operations Plan (EOP) for Accent filed pursuant to 16 Texas Administrative Code § 25.53.
- 5. The relevant operating personnel at Accent and its affiliates are familiar with, and have received training on, the applicable contents and execution of the EOP. The personnel who have received training have been 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.
- 6. The EOP has been reviewed and approved by the appropriate executives at Accent.
- 7. Accent has plans to conduct at least one drill to test the EOP and comply with the new requirement to provide written notice to PUC Staff at least 30 days in advance of the drill. A drill to test the EOP for Accent is scheduled to take place no later than 7/31/2022. Accent will provide notice of the date, time, and location of the drill to PUC Staff. Because Accent does not have physical assets affecting its operations in Texas, we do not understand that it would be appropriate to contact any specific TDEM District Coordinator regarding drills.
- 8. A copy of the EOP has been distributed to local jurisdictions as needed.
- 9. Accent Energy maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident.
- 10. Accent Energy has 1 emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events who have all received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training. Any additional emergency management personnel

designated in the future will complete the required training prior to interacting with any of the designated officials during an emergency.

11. I affirm that the information submitted in th	is affidavit is true and accurate.
	Affiant
SWORN TO AND SUBSCRIBED TO BEFORE M Converged to the second seco	TE on the Haday of April , 2022.