



Filing Receipt

Received - 2022-04-14 03:05:44 PM
Control Number - 53385
ItemNumber - 79



§25.53 EMERGENCY OPERATIONS PLAN

EXECUTIVE SUMMARY

Executive Summary

Overview of the EOP

Karnes Electric Cooperative, Inc. (KEC) Emergency Operations Plan (EOP) was developed to comply with the updated §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. The updated §25.53 made several significant changes to the existing rule based on issues identified after the Winter Storm Uri / ERCOT Load Shed Emergency during February-2021.

The EOP is intended to provide the Cooperative with a clear set of guidelines, policies, and procedures intended to guide preparations, responses, and actions related to all phases and types of electric system emergencies. This document satisfies the requirements of the Public Utility Commission of Texas (PUC) Emergency Operations Plan (Substantive Rule 25, §25.53) and is intended to guide the organization in the preparation for system emergencies and to provide a framework for important tasks and actions required during a system emergency.

KEC maintains the EOP in anticipation of a natural disaster or situation involving curtailment or major interruptions in electrical service. The plan sets forth organizational and personnel assignments, describes emergency communications procedures and includes emergency contacts. Overall, the primary goals for the plan include:

- Provide the structure, policies, and procedures to guide the organization during all types of emergency conditions and situations.
- Enable KEC, other utility and governmental entities, members, and stakeholders to coordinate and communicate effectively during emergency situations and events.
- Establish procedures for the restoration of electrical service in a systematic and efficient manner by effectively utilizing KEC's human and physical resources and if necessary, by securing and utilizing outside resources.
- Ensure that KEC maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes:

EOP Sections

(Section-1) Approval and Implementation Section:

This section begins on page 7 of the EOP and corresponds to §25.53(d)(1).

This Section of the EOP provides the formal plan approvals and tracks all plan revisions. This section also includes an introduction and purpose of the plan and a statement regarding the applicability of the EOP. And to emphasize the commitment of the Cooperative's senior leadership, this section includes a "Message from the General Manager/CEO" that underscores the importance of the plan and encourages all KEC personnel to learn the plan and work with their respective supervisors and teams to understand all relevant parts of the plan. This first section addresses the EOP training policy for KEC and prescribes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

(Section-2) Communications Plan:

This section begins on page 14 of the EOP and corresponds to §25.53(d)(2).

The second section of the EOP is the Communications Plan section. This section of the plan includes the

strategies, key policies, roles, and communications steps that KEC undertakes in an emergency event. Key policies include tracking and coordination of external communications, the designation of spokesperson(s) for the Cooperative, and guidance for all employees regarding media interactions. The remainder of the Communications Plan addresses all the requirements in 16 TAC §25.53 regarding communications with the public, the media, KEC members, the PUC, OPUC, local and State Governmental Entities, Officials, and (County) Emergency Operations Centers, ERCOT, and Critical Load members. The final part of this section sets forth procedures to ensure accurate and timely internal communications, which is critical to an effective emergency response.

(Section-3) Pre-Identified Supplies for Emergency Response Plan:

This section begins on page 19 of the EOP and corresponds to §25.53(d)(3).

This section of the EOP provides information on Pre-Identified Supplies for Emergency Response. This section identifies the guidelines for the management of materials, supplies and resources that KEC may need during emergency events and details regarding the internal roles and responsibilities; use of outside suppliers; advance preparation; location of materials and supplies; and other information regarding supplies, materials, and logistics.

(Section-4) Staffing During Emergency Response Plan:

This section begins on page 21 of the EOP and corresponds to §25.53(d)(4).

This section of the EOP provides information regarding Staffing During Emergency Response and the roles and assignments for KEC personnel during severe weather events and other types of potential emergency situations. This section includes policies and procedures related to the command structure that KEC will utilize and addresses work schedule for KEC personnel that KEC shall use in significant and major system emergency events.

(Section-5) Weather-Related Hazards Identification Plan and EOP Activation Procedure:

This section begins on page 23 of the EOP and corresponds to §25.53(d)(5).

The final section of the EOP is the Weather-Related Hazards Identification Plan and EOP Activation Procedure section. KEC has a series of policies, procedures, and information resources to monitor all types of weather situations and forecasted emergency conditions. This section also provides the policies and procedures related to the activation of the EOP, and the series of emergency levels that have been developed, with criteria for moving to the emergency levels identified in the plan.

EOP Annexes

Weather Emergency Annex:

This section begins on page 27 of the EOP and corresponds to §25.53(e)(1)(A).

The Weather Emergency Annex addresses preparation for both hot and cold weather emergencies. The key policies in this section set forth the requirement for KEC to develop and utilize a checklist for KEC to activate in extreme weather situations.

Load Shed Annex:

This section begins on page 29 of the EOP and corresponds to §25.53(e)(1)(B).

The Load Shed Annex contains information regarding KEC preparations and actions for ERCOT Emergency Event Alerts (EEA) levels and include details for the EEA Level-3 load shed events. The load shed plan contains the policies and procedures in place between South Texas Electric Cooperative (STEC) and KEC regarding the planning and preparation for load shed events and contains detailed information regarding other operational

information for EEA events. This Annex also contains information on the KEC procedure for restoration coordination with STEC following a load shed event, and key policies and procedures that KEC utilizes for restoration from significant system outage events. The final subsection of this Annex provides information on KEC's Critical Load Registry and information related to the maintenance of the registry, communication procedures to these members, and other relevant information regarding Critical Loads.

Pandemic and Epidemic Annex

This section begins on page 36 of the EOP and corresponds to §25.53(e)(1)(C).

In the Pandemic and Epidemic Annex, KEC has provided the Cooperative's policies, procedures, and guidelines that are designed to prepare for pandemic and epidemic outbreaks, and to effectively deal with operations, restoration and communications circumstances presented by a widespread pandemic event. Key policies in this section address the steps KEC takes regarding prevention and preparation, policies related to remote work for KEC personnel, and steps KEC takes to ensure KEC adheres to policies implemented by state and local agencies.

Wildfire Annex:

This section begins on page 41 of the EOP and corresponds to §25.53(e)(1)(D).

The Wildfire plan provides the guidelines, procedures and best practices related to wildfire mitigation and document KEC's policies and practices related to fire prevention and pre-planning, threat mitigation, responses to fire incidents and post incident recovery. This section includes wildfire mitigation actions along with steps KEC would take to respond to any wildfire events.

Hurricane Annex:

This section begins on page 43 of the EOP and corresponds to §25.53. (E) (1) (E)

While KEC's service area is not located in a Hurricane evacuation zone, KEC's service is in close proximity to the Texas Gulf of Mexico coastline and therefore KEC's EOP provides the guidelines, procedures and best practices related to the preparation for tropical storms and hurricanes, the measures KEC has in place to deal with the arrival of these storms, and the policies and procedures for the recovery and restoration of electric service. This section of the EOP aligns with the stages of tropical systems and hurricanes and includes detailed information for the Cooperative. Key policies in the plan correspond to the coordination and communications in advance of these storms and can be initiated up to 72 hours prior to the anticipated arrival of the storm. The plan also provides policies for KEC personnel regarding the time period when the storm makes landfall and provides significant details regarding the damage assessment, recovery and restoration phases.

Cyber Security Annex:

This section begins on page 49 of the EOP and corresponds to §25.53(e)(1)(F).

The Cyber Security Annex provides the guidelines, procedures and best practices related to cyber security for the KEC office facilities and electric distribution system. Based on KEC's facility ownership profile, cyber security policies and measures are focused on network security, anti-virus security and employee education.

Physical Security Incident Annex:

This section begins on page 52 of the EOP and corresponds to §25.53(e)(1)(G).

The Physical Security Annex provides information regarding the policies and procedures KEC has

implemented to protect the office complex and other facilities that are critical to the operation of the KEC electric distribution system. Based on KEC's facility ownership profile this Annex establishes the security policies, guidelines, and requirements for KEC's facilities, visitors, and surveillance.

Plan Distribution and Training

The table below documents the distribution list of the EOP and the associated training document to KEC personnel and the date the training was completed by each employee:

KEC Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Brad Bierstedt	General Manager	4/13/2022	4/13/2022
Patrick Janysek	Operations Manager	4/13/2022	4/13/2022
Russell Korzekwa	Staking Superintendent	4/13/2022	4/13/2022
Susanne Ruple	Member Service Manager	4/13/2022	4/13/2022
Tammy Labus	Finance And Accounting Manager	4/13/2022	4/13/2022
Shane Knight	Distribution Services Manager	4/13/2022	4/13/2022
David Wilson	Technology Manager	4/13/2022	4/13/2022
Kimberly Sanchez	Member Communications Coordinator	4/13/2022	4/13/2022
Matthew Thiele	Business Development Coordinator	4/13/2022	4/13/2022
Pete Garcia	Operations Supervisor - Pleasanton	4/13/2022	4/13/2022
Jesse Gonzales	Operations Supervisor – Karnes City	4/13/2022	4/13/2022
Bonnie Wiatrek	HR Coordinator	4/13/2022	4/13/2022
All Employees	All Departments	4/13/2022	4/13/2022

PROJECT NO. 53385

**AFFIDAVIT OF GENERAL MANAGER OF
KARNES ELECTRIC COOPERATIVE, INC.**

PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §

COUNTY OF KARNES §

BEFORE ME, the undersigned authority, on this day personally appeared, and who, after being duly sworn, stated on his or her oath he or she is entitled to make this Affidavit, and that the statements contained below are true and correct.

I, Brad Bierstedt, swear or affirm that as an Electric Cooperative operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region and control system, confirms the following:

“I am the General Manager of Karnes Electric Cooperative, Inc. (KEC), which is a Texas electric cooperative corporation.

KEC operates an electric distribution utility system in the State of Texas and the Electric Reliability Council of Texas power region.

The Emergency Operations Plan (EOP) developed to comply with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, has been distributed to KEC Managers and Operations personnel;

KEC executives and Operations personnel have received training on the updated EOP;

In accordance with the updated 16 TAC §25.53. Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for KEC Operations personnel is scheduled for a date and time in CY2022 before July 31, 2022;

KEC will notify Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

KEC has distributed the EOP Executive Summary to local Jurisdictions, including regional TDEM personnel and all Counties in the KEC service area;

KEC has a Business Continuity Plan related to returning to normal operations after an emergency event or situation;

KEC’s emergency management personnel who are designated to interact with local, state, and federal emergency management officials during emergency events have received the latest IS-100, 20 IS-200, IS-700, and IS-800 National Incident Management System training.

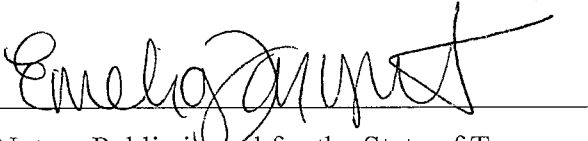


{Signature of Officer of the Cooperative}

General Manager

Karnes Electric Cooperative, Inc.

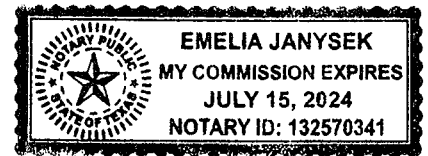
Sworn and subscribed before me on this 13th day of April, 2022.



Notary Public in and for the State of Texas

Notary Seal

(Must be notarized by a notary public in and for the State of Texas)



PUC Primary and Backup Emergency Contact List

Primary Emergency Contact:	Brad Bierstedt
Title:	General Manager
Email:	bradb@karnesec.org
Main Phone:	(830) 780-3956
Cell Phone:	(830) 623-0545

Secondary Backup Emergency Contact:	Patrick Janysek
Title:	Operations Manager
Email:	pjanysek@karnesec.org
Work Phone:	(830) 780- 3952
Cell Phone:	(830) 583-5678