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# §25.53 EMERGENCY OPERATIONS PLAN EXECUTIVE SUMMARY

PREPARED BY  
 **SCHNEIDER**  
**ENGINEERING**  
ENERGY. FOCUS. COMMITMENT.  
FIRM # F-1594

ISSUE DATE: APRIL 14<sup>TH</sup>, 2022

## **Executive Summary**

The Tres City Power, LLC. (TCP) Emergency Operations Plan (EOP) was developed to comply with the updated 16 Texas Administrative Code (TAC) §25.53. Electric Service Emergency Operations Plan Rule, that was approved by the Texas Public Utility Commission on February 25, 2022. The updated 16 TSAC §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 TCP 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 16 TAC 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.

TCP 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 TCP operations personnel, to coordinate and communicate effectively with their QSE Desk and ERCOT during emergency situations and events.
- Establish procedures for the restoration of generator service in a systematic and efficient manner by effectively utilizing TCP's human and physical resources and if necessary, by securing and utilizing outside contracted resources.
- Ensure that TCP maintains compliance with the regulatory requirements related to emergency operations and emergency response.

The EOP is organized in the following Sections and Annexes and includes Appendices that provide additional details.

### **1. CONTENT AND POLICIES**

#### **1.1. Approval and Implementation**

The EOP is intended to provide TCP 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. To emphasize the commitment of the TCP's senior leadership, this section includes a "Message from the Chief Operating Officer, that underscores the importance of the plan and encourages all TCP personnel to learn the plan and work with their manager and respective team to understand all relevant parts of the plan. This first section addresses the EOP approval log, including implementation dates, training policy for TCP and prescribes the responsibilities of the EOP Plan Administrator assigned to ensure the plan is maintained and reviewed on a regular basis.

This Plan is a living document and shall be reviewed and updated on a regular basis. The Manager of Operations is responsible for coordinating these systematic updates.

## **1.2. Communication Plan**

TCP recognizes the importance of providing accurate and timely communications before, during and after emergency conditions. TCP focuses upon easily understandable safety information, generator restoration details and other event updates using a number of channels, including; media (non-proprietary confidential matters), PUCT, TDEM, OPUC, Natural Gas Supplier, and other Local State Governmental Entities.

## **1.3. Pre-Identified Supplies for Emergency Response**

This section identifies the guidelines for the management of materials, supplies and resources that TCP 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 logistical information.

## **1.4. Staffing During Emergency Response Plan**

This section of the EOP provides information including; 24x7 staffing, personnel roles, and assignments for TCP personnel during severe weather events and other types of potential emergency situations. This section includes references to an Incident Command Structure (ICS) that TCP shall use in significant and major system emergency events.

## **1.5. Weather-Related Hazards Identification Plan and EOP Activation**

TCP uses a series of information sources and resources to monitor all types of weather situations and forecasted emergency conditions. The Chief Operations Officer or his designee have the authority to activate the TCP EOP. Either is responsible for completing an internal “Emergency Declaration and Tracking Form” (EDT-Form). This form shall document the time, scope, and expected duration along with other key documentation of the event.

## **1.6. Weather Emergency Annex**

This Annex provides both extreme hot weather and extreme cold weather emergency operating plans and procedures for operational personnel. The information in this section provides; 1) operational plans and procedures, 2) identifies fuel switching capabilities, and 3) a checklist of necessary supplies and personnel for TCP to utilize during either type of extreme weather situations. These procedures were developed to include lessons learned from Winter Storm Uri in 2021.

## **1.7. Water Shortage Annex**

This Annex is not applicable to TCP Generator Facility.

## **1.8. Restoration of Service Annex**

This Annex contains information regarding TCP preparations, procedures, utilized for the restoration of generator service. TCP operations personnel have been trained in response to a Forced Outage, Derate or a Failed Startup Loading Failure that diminishes generation capacity, including notification to the Qualified Scheduling Entity (QSE).

### **1.9. Pandemic and Epidemic Annex**

In this Annex, TCP has provided guidelines and procedures to effectively deal with generator operations, restoration and communications circumstances presented by a widespread pandemic event and to generally prepare TCP operations personnel for the possibility of a pandemic.

### **1.10. Hurricane Annex**

TCP's Generator Facility is not located in a Hurricane evacuation zone, as defined by TDEM, therefore this EOP Annex requirement is not applicable. However, TCP Management has developed a Hurricane Annex, complete with a process and procedures to support generator reliability and for the safety of TCP's operations personnel.

### **1.11. Cyber Security Annex**

TCP Management recognizes the need to protect TCP electronic assets, including but not limited to HMI computer systems, and Distributed Control Systems from ever increasing information and cybersecurity threats. This policies contained establish an Information & Cyber Security Program within TCP to ensure adequate measures are taken and controls are in place to mitigate threats and protect those company resources. Included in this annex is policies, procedures, and other requirements for all TCP operations personnel to adhere to.

### **1.12. Physical Security Incident Annex**

This Annex provides information regarding the policies and procedures TCP has implemented to protect the physical assets that are critical to the operation of the TCP Generator Facility. Established security policies, guidelines, and requirements for TCP's operations personnel, contractors, and visitors are mandatory. Included in this annex is monitoring, reporting requirements, and a policy that requires TCP operations personnel to remain vigilant while on duty.

## **Appendices**

The final portion of the EOP is an Appendices section that is intended to provide additional information related to some of the EOP Sections and Annexes to enhance the useability of the EOP for TCP employees and stakeholders.


## 2. SECTIONAL REFERENCES

Rule Reference	Section	EOP Page Number
(d)(1)(A - E)	Approval and Implementation	7
(d)(2)(A - D)	Communication Plan	15
(d)(3)	Pre-Identified Supplies	18
(d)(4)	Staffing during Emergency Response	19
(d)(5)	Weather-Related Hazards Identification and EOP Activation	20
(e)(2)(A)	Weather Emergency Annex	25
(e)(2)(B)	Water Shortage Annex	28
e)(2)(C)	Generator Restoration of Service Annex	29
e)(2)(D)	Pandemic and Epidemic Annex	30
e)(2)(E)	Hurricane Annex	33
e)(2)(F)	Cyber Security Annex	35
e)(2)(G)	Physical Security Annex	37

### 3. Plan Distribution and Training

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

TCP Personnel		EOP Distribution Date	EOP Training Completed Date
Name	Title		
Ben Frederick	Plant Manager	10/20/22	10/20/22
Ted Thomas	Lead O&M Technician	10/20/22	10/20/22
Chance Odell	O&M Technician	10/20/22	10/20/22
Ernest Cisneros	O&M Technician	10/20/22	10/20/22
Joe Marin	I&C Technician	10/20/22	10/20/22



EMERGENCY OPERATIONS PLAN TRAINING ATTENDANCE

Full Name (Please Print)	Job Title	Signature
Harrison Chance Odell	O+M	Chance Odell
Joe Marin	I+C	Joe Marin
Ben Frederick	Manager	Ben Frederick
Ted Thomas	O&M Lead	Ted Thomas
Ernest Cisneros	O&M	Ernest Cisneros

Trainer: Greg Pyka  
 October 20, 2022

PROJECT NO. 53385  
AFFIDAVIT OF CHIEF OPERATIONS OFFICER OF  
TRES CITY POWER, LLC.  
PURSUANT TO 16 TEXAS ADMINISTRATIVE CODE § 25.53

STATE OF TEXAS §  
COUNTY OF VICTORIA §

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, Randy Bird, swear or affirm that Tres City Power, LLC, Generator Facility, as a Power Generation Company (PGC) operating in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region, confirms the following:

Tres City Power, LLC (TCP) operates a Generator Facility in the State of Texas and the Electric Reliability Council of Texas (ERCOT) region;

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

TCP Operations personnel have received training on the updated EOP;

TCP executives have reviewed the EOP;

In accordance with the updated §25.53, Electric Service Emergency Operations Plan Rule, a drill (tabletop exercise) for TCP Operations personnel was conducted in CY2022;

TCP notified Commission Emergency Management Personnel and regional TDEM representative(s) prior to the drill;

TCP has distributed the EOP to local jurisdictions, including Victoria County;

TCP has a business continuity plan related to returning to normal operations after an emergency event or situation;

TCP'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.



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(Signature of Officer of the Cooperative)

Chief Operating Officer  
Tres City Power, LLC.

Sworn and subscribed before me on this 5th day of November 2022.



Notary Public in and for the State of Texas

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

Not

