



Filing Receipt

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9450 SW Gemini Drive PMB #68743, Beaverton, OR 97008-7105
www.intersectpower.com

December 23, 2022

Public Utility Commission of Texas Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP Lumina, LLC - Project No. 53385 - PROJECT TO SUBMIT EMERGENCY OPERATIONS PLANS AND RELATED DOCUMENTS UNDER 16 TAC § 25.53 - PGC # 20721

Dear Filing Clerk,

Pursuant to PUC Substantive Rule 25.53, IP Lumina, LLC is filing an emergency operations plan (EOP), executive summary, and affidavit under this section. Please note that IP Lumina, LLC is in construction with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in mid-/late 2023. Due to the project's non-operational status, many of the filing requirements are not yet applicable to an operating facility and are noted as such and/or are explained in the context of construction.

Statement of intended operational compliance: IP Lumina, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

This initial filing includes:

- One (1) copy of the Executive Summary Letter
- One (1) copy of the EOP Executive Summary Table
- One (1) copy of the signed affidavit affirming the content per Section 4(C)
- One (1) copy of Primoris Renewable Energy's *Job Site Emergency Response Plan (JSERP)*
- One (1) copy of Primoris Renewable Energy's *Job Site Safety Plan (JSSP)* Lumina 1 Project No. 55086. (Note: This Plan serves as IP Lumina, LLC's Emergency Operations Plan during the construction period).
- One (1) copy of Primoris Renewable Energy's *Pandemic Preparedness & Response Plan*. (Note: This Plan serves as IP Lumina, LLC's pandemic and epidemic annex during the construction period).
- One (1) copy of Primoris Renewable Energy's *Hurricane Preparedness Plan*
- One (1) copy of the Emergency Contact Information Form identifying the current Primary, Secondary, and Tertiary Emergency Contacts



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- One (1) copy of Primoris Renewable Energy's Orientation Records

If you have questions about this submission, please contact
energyregulatory@intersectpower.com.

Sincerely,

IP Lumina, LLC a Delaware limited
liability company

By: 

Name: Lucas Dunnington

Title: President



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Public Utility Commission of Texas
Attn: Central Records
1701 N. Congress Ave., 8-100
Austin, TX 78711-3326

Subject: IP Lumina, LLC - Emergency Operations Plan Filing for PGC Registration #20721 - Executive Summary

Pursuant to PUC Substantive Rule 25.53, IP Lumina, LLC submits an executive summary. Please note that IP Lumina, LLC is in construction with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in mid/late 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted in the table below.

Statement of intended future compliance: IP Lumina, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

Rule 25.53; Filing Requirements, Sec on 1(A)(i)	Explanation of Project Construction Status
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Describes the contents and policies I contained in the EOP

The project is currently under construction and no operating personnel are currently present. During construction the project utilizes Primoris Renewable Energy's Job Site Safety Plan (JSSP) Project No. 55086 as the EOP for the construction phase. Please see the attached table referencing the content and policies contained in the JSSP.



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<p>Includes reference to specific sections and page numbers of the entity's EOP that correspond with the requirements of this rule</p> <p>II</p>	<p>Please see attached table summarizing the content and policies contained in the JSSP with Section and Page Number references corresponding with the requirements of the rule.</p>
<p>Includes the record of distribution required under 4A</p> <p>III</p>	<p>Record of distribution is covered by the orientation and training attendance sheets, as well as a standing policy that requires verification of printed documents against the Primoris HSE Intellex-Document Control Application to ensure that the latest, most up to date version is used; see note above the Table of Contents on page 2 of 59. Training Requirements are stated in Section 7 (page 19 of 59) and Record Keeping requirements in Section 19.6 (page 52 of 59). Please refer to the orientation records identifying the individuals that have received training on the contents of the JSSP.</p>
<p>IV Contains the affidavit required under 4C</p>	<p>Please see the attached affidavit</p>

Attachments:

- EOP Executive Summary Table
- Orientation records
- Affidavit

Executive Summary Table

Please note that IP Lumina, LLC is being constructed for Intersect Power, LLC as the client/owner, with Primoris Renewable Energy, Inc. performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in mid/late 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted and the project is utilizing Primoris' Lumina Job Site Safety Plan, Emergency Response Plan, and Pandemic Response Plan as the interim EOP until operations.

Statement of intended future compliance: IP Lumina, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD and commencing operations.

Executive Summary Table

Ref	Item	Primoris JSSP Content	Primoris JSSP Reference
d	Information to be included in the emergency operations plan	N/A	N/A
	An EOP may consist of one or multiple documents. Each entity's EOP must include the information identified below, as applicable. If a provision in this section does not apply to an entity, the entity must include in its EOP an explanation of why the provision does not apply	N/A	N/A
d1	An approval and implementation section that:	N/A	N/A
d1A	introduces the EOP and outlines its applicability;	Section 1.1 identifies the purpose of the document.	Job Site Safety Plan Section 1.1 Purpose
d1B	lists the individuals responsible for maintaining and implementing the EOP, and those who can change the EOP;	This section identifies the name and responsibility/roles from Primoris are responsible for maintaining and implementing the Job Site Safety Plan (JSSP). The Project Manager is responsible for the execution of legally required HSE regulatory practices and the HSE Representative is responsible for administering and maintaining the JSSP.	Job Site Safety Plan Section 2.3 and 2.5: Responsibilities

d1C	provides a revision control summary that lists the dates of each change made to the EOP since the initial EOP filing pursuant to paragraph (1) of this subsection;	The Version Control Tables identify the latest revision date to the site specific JSSP and Emergency Response Plans.	Job Site Safety Plan Version Control and Current Version Approvals (Currently includes Date of change) (Pg 2) Job Site Emergency Response Plan Version Control and Current Version Approvals (Currently includes Date of change) (Pg 2)
d1D	provides a dated statement that the current EOP supersedes previous EOPs; and	The JSSP includes a statement that updated versions of the JSSP superseded previous published versions.	Job Site Safety Plan Version Control and Current Version Approvals (Currently includes Date of change) (Pg 2); JSSP Section 1.1
d1E	states the date the EOP was most recently approved by the entity.	The Job Site Safety Plan (JSSP) Original Date of Issue was May 10, 2022. The current version is dated [July 25 ,2022]. The Job Site Emergency Response Plan Current Version Approval is dated [July 25, 2022]. The current version is dated [July 25, 2022].	Job Site Safety Plan Table of Contents (Reflects Revision Date and Issued By) (Pg 2) Job Site Emergency Response Plan Version Control and Current Version Approvals (Currently includes Date of change) (Pg 2)
d2	A communication plan	Primoris' Job Site Emergency Response Plan includes an Emergency Response Plan Summary Sheet including communication/notification steps in response checklists; Emergency Contact List for local Fire, EMS, and Police departments; Warning, Notification, and Communication Systems.	Job Site Emergency Response Plan, A-1: Emergency Response Plan Employee Summary Sheet; A-3: Emergency Contact List; A-6: Warning, Notification and Communication Systems Job Site Safety Plan Section 19.8, Emergency Notification List, Section 19.9 Emergency Response Plan

d2B	An entity with generation operations must describe the procedures during an emergency for communicating with the media; the commission; OPUC; 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.	Primoris' Job Site Emergency Response Plan includes an Emergency Response Plan Summary Sheet including communication/notification steps in response checklists; Emergency Contact List for local Fire, EMS, and Police departments; Warning, Notification, and Communication Systems. Primoris conducts meetings with external agencies including Sheriff's Office and local EMS and Fire Departments.	Job Site Emergency Response Plan, A-1: Emergency Response Plan Employee Summary Sheet; A-3: Emergency Contact List; A-6: Warning, Notification and Communication Systems Job Site Safety Plan Section 8.2 Emergency Communication
d3	A plan to maintain pre-identified supplies for emergency response.	Primoris' Job Site Safety Plan addresses weather monitoring and heat stress prevention. The Job Site Emergency Response Plan identifies maintained, stored, and accessible items related to severe weather events. Additionally, the ERP addresses Personnel Trained in First Aid, CPR, use of an Defibrillator and locations of life saving emergency response equipment.	Job Site Safety Plan, Section 11.7.1 Weather Monitoring; Section 11.2 Heat Stress Prevention Job Site Emergency Response Plan, Section 7: Severe Weather Plan; Section 9: Medical Emergency Plan
d4	A plan that addresses staffing during emergency response	Primoris' Job Site Emergency Response Plan identifies an Emergency Response Team and an Evacuation Plan asserting the evacuation team will direct and account for employees.	Job Site Emergency Response Plan, Section 5: Emergency Response Team; Section 6: Evacuation Plan

d5	A plan that addresses how an entity identifies weather-related hazards, including tornadoes, hurricanes, extreme cold weather, extreme hot weather, drought, and flooding, and the process the entity follows to activate the EOP	Primoris' Job Site Emergency Response Plan includes the monitoring of weather, informing site leadership about the conditions, and implementing severe weather procedures.	Job Site Emergency Response Plan, Section 7: Severe Weather Plan Job Site Safety Plan, Section 11.7: Severe Weather Hurricane Preparedness Plan (Pgs 1-14)
d6	Each relevant annex, as detailed in subsection (e) of this section and other annexes applicable to an entity.	N/A	N/A
e	Annexes to be included in the emergency operations plan.	N/A	N/A
e2	An electric cooperative, an electric utility, or a municipally owned utility that operate a generation resource in Texas; and a PGC must include the following annexes for its generation resources other than generation resources authorized under PURA §39.918:	N/A	N/A
e2A	A weather emergency annex that includes:	Primoris' Job Site Emergency Response Plan includes the monitoring of weather, informing site leadership about the conditions, and implementing severe weather procedures.	Job Site Emergency Response Plan, Section 7: Severe Weather Plan Job Site Safety Plan, Section 11.7: Severe Weather Hurricane Preparedness Plan (Pgs 1-14)

e2Ai	operational plans for responding to a cold or hot weather emergency, distinct from the weather preparations required under §25.55 of this title;	Primoris' Job Site Emergency Response Plan includes the monitoring of weather, informing site leadership about the conditions, and implementing severe weather procedures. Primoris' Job Site Emergency Response Plan also includes an Emergency Response Plan Employee Summary Sheet that is formatted as a checklist to guide evacuation, severe weather, fire, medical emergency, active shooter responses. IP Lumina LLC will implement an operational based EOP that will address these requirements, 30 days prior to COD.	Job Site Emergency Response Plan, Section 5: Emergency Response Team, Section 6: Evacuation Plan including identification of an Evacuation Team, Section 7: Severe Weather Plan, Section 14 A-1: Emergency Response Plan Employee Summary Sheet, Section 14 A-2 Facility Map and Diagrams Job Site Safety Plan, Section 11.7: Severe Weather
e2Aii	verification of the adequacy and operability of fuel switching equipment, if installed; and	IP Lumina, LLC is being constructed for Intersect Power, LLC as the client/owner, by Primoris Renewable Energy. The site backup power system is being designed, installed, and commissioned. Verification of operability will be completed 30 days prior to COD.	N/A

e2Aiii	a checklist for generation resource personnel to use during a cold or hot weather emergency response that includes lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency;	Primoris' Job Site Emergency Response Plan includes an Emergency Response Plan Employee Summary Sheet that is formatted as a checklist to guide evacuation, severe weather, fire, medical emergency, active shooter responses. It also identifies Facility Maps and Diagrams displaying evacuation routes, assembly areas, shelter in place locations, emergency vehicle entrances, and locations of first aid and safety equipment.	Job Site Emergency Response Plan, Section 5: Emergency Response Team, Section 6: Evacuation Plan including identification of an Evacuation Team, Section 7: Severe Weather Plan, Section 14 A-1: Emergency Response Plan Employee Summary Sheet, Section 14 A-2 Facility Map and Diagrams Hurricane Preparedness Plan (Pgs 1-14)
e2B	A water shortage annex that addresses supply shortages of water used in the generation of electricity;	This is not applicable due to the generation type (PV). Solar generation is not dependent upon water.	N/A
e2C	A restoration of service annex that identifies plans intended to restore to service a generation resource that failed to start or that tripped offline due to a hazard or threat;	IP Lumina, LLC is being constructed for Intersect Power, LLC as the client/owner, with Primoris Renewable Energy performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in June 2023. Due to the project's current non-operational status, this requirement is not yet applicable.	N/A
e2D	A pandemic and epidemic annex;	Primoris has issued and follows a <i>HSE Management System, COVID-19 Preparedness Plan</i> .	HSE Management System, COVID-19 Preparedness Plan (pg 1-10)

e2E	A hurricane annex that includes evacuation and re-entry procedures if facilities are located within a hurricane evacuation zone, as defined by TDEM;	Primoris' Job Site Emergency Response Plan includes an Emergency Response Plan Employee Summary Sheet that is formatted as a checklist to guide evacuation, severe weather, fire, medical emergency, active shooter responses. It also identifies Facility Maps and Diagrams displaying evacuation routes, assembly areas, shelter in place locations, emergency vehicle entrances, and locations of first aid and safety equipment. The Plan's policy identifies that evacuation and re-entry is to be guided by the identified Evacuation Team.	Job Site Emergency Response Plan, Section 5: Emergency Response Team, Section 6: Evacuation Plan including identification of an Evacuation Team for evacuation and re-entry, Section 7: Severe Weather Plan, Section 14 A-1: Emergency Response Plan Employee Summary Sheet, Section 14 A-2 Facility Map and DiagramsHurricane Preparedness Plan (Pgs 1-14)
e2F	A cyber security annex;	IP Lumina, LLC is being constructed for Intersect Power, LLC as the client/owner, with Primoris Renewable Energy performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in June 2023. Due to the project's current non-operational status, this requirement is not yet applicable.	N/A
e2G	A physical security incident annex; and	Primoris' Job Site Safety Plan identifies security policies in Section 20 asserting Primoris will provide site security and identifies access procedures including	Job Site Safety Plan, Section 20.1.2: Security

		affirmation that security personnel will not interfere with emergency response.	
e2H	Any additional annexes as needed or appropriate to the entity's particular circumstances	NA	NA



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Public Utility Commission of Texas

Attn: Central Records

1701 N. Congress Ave., 8-100 Austin,

TX 78711-3326

Subject: IP Lumina, LLC – Emergency Operations Plan Filing for PGC Registration #20721 – Affidavit

Pursuant to PUC Substantive Rule 25.53, IP Lumina, LLC submits an affidavit executed by the entity's highest-ranking representative, official, or officer with binding authority over the entity affirming the below. Please note that IP Lumina, LLC is being constructed for Intersect Power, LLC as the client/owner, with Primoris Renewable Energy, Inc. performing as the general contractor with an anticipated Commercial Operation Date and ERCOT Part III Commissioning Checklist Approval date in mid/late 2023. Due to the project's non-operational status, many of the requirements of the Affidavit are not yet applicable as noted and the project is utilizing Primoris Renewable Energy's *Job Site Safety Plan (JSSP)* Lumina 1 Project No. 55086 as the interim EOP until operations.

Statement of intended future compliance: IP Lumina, LLC fully intends to comply with all requirements during operations and will submit a revised EOP, Executive Summary, and Affidavit no later than 30 days prior to COD.

Rule 25.53; Filing Requirements, Section 41(i-vi)

Relevant operating personnel are familiar with and have received training on the applicable contents and execution of the EOP, and such personnel are 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;

The EOP has been reviewed and approved by the appropriate executives;

Explanation of Project Construction Status

The project is currently under construction and no operating personnel are currently present. During construction, the project utilizes Primoris Renewable Energy's *Job Site Safety Plan (JSSP)* Lumina 1 Project No. 55086. Primoris Renewable Energy requires all project employees engaged in work at the Lumina project to receive training (Section 7) and document via the Record Keeping requirements (Section 19.6)

The project is currently in construction and Primoris Renewable Energy's JSSPP identifies Management Commitment and Assignment of responsibilities (Section 2) including a statement from Primoris Renewable Energy (Section 1.1 & 1.2) and the names and contact



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Drills have been conducted to the extent
lii required by subsection (f) of this section;

The EOP or an appropriate summary has
been distributed to local jurisdictions as
lv needed;

The entity maintains a business continuity
plan that addresses returning to normal
operations after disruptions caused by an
v incident; and

The entity's emergency management
personnel who are designated to interact
with local, state, and federal emergency
management officials during emergency
vi events have received the latest IS-100, IS-

information of Management including the
Safety Manager, Site Manager, and Project
Manager. Additionally, the JSPP identifies the
Approval by Primoris Renewable Energy and
Date of Issue information on page 1.

The project is currently under construction
and no operationally focused drills are able to
be conducted. The project will conduct drills
to the extent required by subsection (f) prior
to and closer to commencing Commercial
Operations. In the interim, Primoris
Renewable Energy conducts training on the
JSSP as described above.

Primoris Renewable Energy will conduct
meetings and correspondence as needed with
external agencies including local EMS, Fire,
Medical Clinics, and Police, to facilitate the
safe conduct of the project per their JSSP
(Section 8.2).

Primoris Renewable Energy's JSSP maintains
Plans and Procedures governing events and
incidents for the construction period. Topics
include Incident Management (Section 19)
Event Investigations (Section 19.3), Lessons
Learned (Section 19. 5) and Record Keeping
Procedures (Section 19.6); Safety Inspections
(Section 18); Primoris Renewable Energy's Job
Site Emergency Response plan covers the
Emergency Response Team (Section 5 & A-3),
Evacuation Plan (Section 6), Severe Weather
Plan (Section 7), Fire Emergency Plan (Section
8)

The project is currently in construction and no
operational emergency management
personnel have been designated to interact
with emergency officials. The appropriate
personnel will be identified and trained prior
to and closer to commencing Commercial



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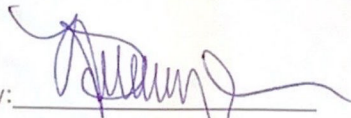
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200, IS-700, and IS-800 National Incident
Management System training

Operations. Primoris Renewable Energy will
conduct meetings and correspondence with
external agencies as needed per their Job Site
Emergency Response Plan (Section A-1 & A-3).

Reviewed and affirmed by:

By: 

Name: Lucas Dunnington

Title: President

IP Lumina, LLC

a Delaware limited liability company

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
) ss.
County of Nevada)

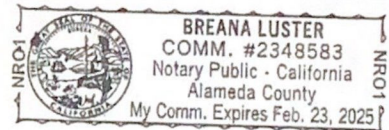
On December 24, 2022 before me, Breana Luster, Notary Public, personally appeared Lucas Dunnington, who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that they executed the same in their authorized capacity, and that by their signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

Witness my hand and official seal.

Signature [Signature]

(Seal)





Job Site Emergency Response Plan

Lumina 1

Project: 12315 FM 1142

Snyder, TX 79549



HSE Management System

Job Site Safety Plan

Lumina 1

Project Number: 55086

